


Mandatory LEA 02		Discretionary Mandatory	
Type of engagement	Individual/ internal staff engagements	Reason for interaction	<input checked="" type="checkbox"/> To support investment decisionmaking in & company relevant ESG areas <input checked="" type="checkbox"/> To enhance corporate practice or identify the need for additional or <input type="checkbox"/> Other: specify
Type of engagement	Collaborative engagements	Reason for interaction	<input type="checkbox"/> To support investment decisionmaking in & company relevant ESG areas <input type="checkbox"/> To enhance corporate practice or identify the need for additional or <input type="checkbox"/> Other: specify
Type of engagement	Service provider engagements	Reason for interaction	<input type="checkbox"/> To support investment decisionmaking in & company relevant ESG areas <input type="checkbox"/> To enhance corporate practice or identify the need for additional or <input type="checkbox"/> Other: specify

# PRIVATE RI REPORT

## 2017

BlueBay Asset Management LLP

## About this report

This report is an export of the individual Signatory organisation responses to the PRI Reporting Framework during the 2017 reporting period. It shows your responses to all completed indicators, even those you chose to keep private. It is designed for your internal review or – if you wish - to share with your stakeholders. The PRI will **not publish** this report on its website. Instead, you will be able to access the public RI Transparency report of your organisation and that of other signatories on the [PRI website](#).

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. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

## Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and how these relate to the six [Principles for Responsible Investment](#). It can be used by stakeholders as an 'at a glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
☑	The signatory has completed some parts of this indicator
🔒	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator.
🔍	The signatory has flagged this indicator for internal review

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.

# Principles Index

Organisational Overview				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OO 01	Signatory category and services	✓	Public							✓
OO 02	Headquarters and operational countries	✓	Public							✓
OO 03	Subsidiaries that are separate PRI signatories	✓	Public							✓
OO 04	Reporting year and AUM	✓	Public							✓
OO 05	Breakdown of AUM by asset class	✓	Asset mix disclosed in OO 06							✓
OO 06	How would you like to disclose your asset class mix	✓	Public							✓
OO 07	Fixed income AUM breakdown	✓	Public							✓
OO 08	Segregated mandates or pooled funds	🔒	n/a							✓
OO 09	Breakdown of AUM by market	✓	Public							✓
OO 10	RI activities for listed equities	🔒	n/a							✓
OO 11	RI activities in other asset classes	✓	Public							✓
OO 12	Modules and sections required to complete	✓	n/a							✓
OO End	Module confirmation page	✓	-							

Strategy and Governance				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SG 01	RI policy and coverage	✓	Public							✓
SG 02	Publicly available RI policy or guidance documents	✓	Public							✓
SG 03	Conflicts of interest	✓	Public							✓
SG 04		✓	Public							✓
SG 05	RI goals and objectives	✓	Public							✓
SG 06	Main goals/objectives this year	✓	Public							✓
SG 07	RI roles and responsibilities	✓	Public							✓
SG 08	RI in performance management, reward and/or personal development	✓	Public							✓
SG 09	Collaborative organisations / initiatives	✓	Public				✓	✓		
SG 10	Promoting RI independently	✓	Public				✓			
SG 11	Dialogue with public policy makers or standard setters	✓	Public				✓	✓	✓	
SG 12	ESG issues in strategic asset allocation	✓	Public	✓						
SG 13	Long term investment risks and opportunity	✓	Public	✓						
SG 14	Allocation of assets to environmental and social themed areas	✓	Public	✓						
SG 15	ESG issues for internally managed assets not reported in framework	✓	Public							✓
SG 16	ESG issues for externally managed assets not reported in framework	🔒	n/a							✓
SG 17	Innovative features of approach to RI	✓	Public							✓
SG End	Module confirmation page	✓	-							

Direct - Fixed Income				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
FI 01	Breakdown by passive,active strategies	✓	Public							✓
FI 02	Option to report on <10% assets	🔒	n/a							✓
FI 03	Breakdown by market and credit quality	✓	Public							✓
FI 04	Incorporation strategies applied	✓	Public	✓						
FI 05	ESG issues and issuer research	✓	Public	✓						
FI 06	Processes to ensure analysis is robust	✓	Public	✓						
FI 07	Types of screening applied	✓	Public	✓						
FI 08	Negative screening - overview and rationale	✓	Public	✓						
FI 09	Examples of ESG factors in screening process	✓	Public	✓						
FI 10	Screening - ensuring criteria are met	✓	Public	✓						
FI 11	Thematic investing - overview	🔒	n/a	✓						
FI 12	Thematic investing - themed bond processes	🔒	n/a	✓						
FI 13	Thematic investing - assessing impact	🔒	n/a	✓						
FI 14	Integration overview	✓	Public	✓						
FI 15	Integration - ESG information in investment processes	✓	Public	✓						
FI 16	Integration - E,S and G issues reviewed	✓	Public	✓						
FI 17	ESG incorporation in passive funds	🔒	n/a	✓						
FI 18	Engagement overview and coverage	✓	Public		✓					
FI 19	Engagement method	✓	Public	✓	✓					
FI 20	Engagement policy disclosure	✓	Public	✓	✓					
FI 21	Financial/ESG performance	✓	Public							✓
FI 22	Examples - ESG incorporation or engagement	✓	Public	✓	✓					
FI 23	Communications	✓	Public		✓					✓
FI End	Module confirmation page	✓	-							

Closing Module				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
CM 01	Assurance, verification, or review	✓	n/a							✓
CM 02	To what extent has the Reporting Framework captured your implementation of the Principles.	✓	n/a							✓
CM 03	Suggestions or comments on the Reporting and Assessment process	✓	n/a							✓
CM 04	Reporting & Assessment contact	✓	n/a							✓
CM 05	Final review before submission	✓	n/a							✓
CM 06	Submit your responses	✓	n/a							✓
CM Fin		-	n/a							

# BlueBay Asset Management LLP

## Reported Information

## Private version

## Organisational Overview

## PRI disclaimer

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## Basic Information

OO 01	Mandatory	Public	Gateway/Peering	General
-------	-----------	--------	-----------------	---------

### OO 01.1 Select the services you offer.

Fund management

% of assets under management (AUM) in ranges

<10%

10-50%

>50%

Fund of funds, manager of managers, sub-advised products

Other, specify

Execution and advisory services

### OO 01.2 Additional information. [Optional]

Founded in 2001, BlueBay Asset Management LLP (BlueBay) is a specialist fixed income manager offering solutions to institutions, consultants and financial intermediaries. We invest across the fixed income spectrum, from active long-only 'benchmark aware' portfolios to hedge funds/private debt. We are active in the following investment strategies: investment grade debt, emerging market debt, high yield/distressed debt& loans, convertible bonds, private lending and multi-credit.

Based in London, with offices in the US, Japan, Hong Kong, Switzerland, Ireland, Luxembourg and Germany, we employ approx. 376 full time employees and manage over USD 50.2 billion (as of 31 December 2016) for institutional investors, distribution networks and high net worth individuals.

BlueBay is a wholly-owned subsidiary of Royal Bank of Canada (RBC) and part of the RBC asset management division, RBC Global Asset Management group of companies.

OO 02	Mandatory	Public	Peering	General
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### OO 02.1 Select the location of your organisation's headquarters.

United Kingdom

### 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).

FTE
-----

376

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

NOTE OO 02.3: The headcount as of December 31st 2016 was 387 employees including 11 part-time equivalent (PTE) employees. FTE is 376 employees.

OO 03	Mandatory	Public	Descriptive	General
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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]
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NOTE: Our parent company, RBC, owns another asset management company, RBC Global Asset Management, which in August 2015, joined as a member of the PRI.

OO 04	Mandatory	Public	Gateway/Peering	General
-------	-----------	--------	-----------------	---------

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

31/12/2016

OO 04.2	Indicate your total AUM at the end of your reporting year, excluding subsidiaries you have chosen not to report on.
---------	---------------------------------------------------------------------------------------------------------------------

	trillions	billions	millions	thousands	hundreds
Total AUM		50	204	827	000
Currency	USD				
Assets in USD		50	204	827	000

OO 04.4	Additional information. [Optional]
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NOTE OO 04.2: AUM excludes uncalled capital commitments in private lending funds.

OO 06	Mandatory	Public	Descriptive	General
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**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

as percentage breakdown

	Internally managed (%)	Externally managed (%)
Listed equity	0	0
Fixed income	95	0
Private equity	0	0
Property	0	0
Infrastructure	0	0
Commodities	0	0
Hedge funds	1.5	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Other (1), specify	3.5	0
Other (2), specify	0	0

'Other (1)' specified

Private Debt

as broad ranges

OO 06.2

Publish our asset class mix as per attached image [Optional].

As of 31<sup>st</sup> December 2016

Global strategies	Active long only	Unconstrained	Absolute return	AuM (US\$m)
Convertibles	○			2,267
Emerging Markets	○	○	○	13,128
Investment Grade	○	○	○	21,479
Leveraged Finance <sup>1</sup>	○	○	○	8,462
Multi-Asset Credit	○	○		4,869
<b>Total Company AuM</b>				<b>50,205</b>

OO 07

Mandatory to Report Voluntary to Disclose

Public

Gateway

General

OO 07.1

Provide to the nearest 5% the percentage breakdown of your Fixed Income AUM at the end of your reporting year, using the following categories.

<b>Internally managed</b>	SSA	30
	Corporate (financial)	18
	Corporate (non-financial)	52
	Securitised	0
	<b>Total</b>	<b>100%</b>

<b>OO 09</b>	<b>Mandatory to Report Voluntary to Disclose</b>	<b>Public</b>	<b>Peering</b>	<b>General</b>
--------------	--------------------------------------------------	---------------	----------------	----------------

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

Developed Markets	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50 %
Emerging, Frontier and Other Markets	<input type="radio"/> 0% <input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> >50 %
<i>Total</i>	<i>100%</i>

**Gateway asset class implementation indicators**

<b>OO 11</b>	<b>Mandatory</b>	<b>Public</b>	<b>Gateway</b>	<b>General</b>
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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).

- Fixed income – SSA
- Fixed income – corporate (financial)
- Fixed income – corporate (non-financial)
- Hedge funds
- Other (1)
- None of the above

'Other (1)' [as defined in OO 05]

Private Debt

**OO 12****Mandatory****Public****Gateway****General**

**You will need to make a selection in OO 12.1 only if you have any voluntary modules that you can choose to report on.**

**OO 12.1**

Select from below any additional applicable modules or sections you would like to report on voluntarily. You are only required to report on asset classes that represent 10% or more of your AUM.

Core modules

- Organisational Overview
- Strategy and Governance

RI implementation directly or via service providers

Direct - Fixed Income

- Fixed income - SSA
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)

Closing module

- Closing module

# BlueBay Asset Management LLP

## Reported Information

### Private version

### Strategy and Governance

## PRI disclaimer

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## Investment policy

SG 01

Mandatory

Public

Core Assessed

General

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

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.

Select all that apply

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 checked="" type="checkbox"/> Formalised guidelines on corporate governance factors <input type="checkbox"/> Asset class-specific RI guidelines <input checked="" type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input checked="" type="checkbox"/> Other, specify (1) Statement on UK Stewardship Code <input checked="" type="checkbox"/> Other, specify(2)	<input checked="" type="radio"/> Applicable policies cover all AUM <input type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM
<div style="background-color: #0070c0; color: white; padding: 2px;">other (2) description</div> Statement on UK MSA	

<b>SG 01.4</b>	Indicate what norms you have used to develop your investment policy that covers your responsible investment approach.
----------------	-----------------------------------------------------------------------------------------------------------------------

- UN Global Compact Principles
- UN Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights
- International Bill of Human Rights
- International Labour Organization Conventions
- United Nations Convention Against Corruption
- OECD Guidelines for Multinational Enterprises
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

No

<b>SG 01.6</b>	Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]
----------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------

Our core approach recognises the potential value add of ESG analysis to credit analysis and the importance of having efficient and effective capital markets to reduce systematic risks which may impact our investments.

We adopted our first ESG investment risk policy in July 2013, with the latest version approved in December 2014. It has been developed by our ESG function with input and approval internally from key individuals, and is reviewed and updated as deemed appropriate to reflect material developments/changes. Whilst our ESG investment risk framework applies for all managed assets, the scope to which different ESG investment strategies are applied varies in terms of pooled and segregated assets, as well as between public and private debt assets.

NOTE SG 01.4 - we have not ticked these as BlueBay does not formally/explicitly link the development of its ESG investment risk policy to specific norms. However, in practice, the policy has been informed by consideration of ESG related good/best practices, and norms may be one input into this. Furthermore in the actual incorporation of ESG risk factors in our credit analysis, we may take these into account in terms of expectations we may place on issuers in terms of their ESG practices.

<b>SG 02</b>	<b>Mandatory</b>	<b>Public</b>	<b>Core Assessed</b>	<b>PRI 6</b>
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**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

<b>SG 02.1</b>	Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.
----------------	--------------------------------------------------------------------------------------------------------------------------------------

- Policy setting out your overall approach

	URL/Attachment
--	----------------

- URL

URL

<http://www.bluebay.com/globalassets/documents/esg-investment-risk-policy.pdf>

Attachment (will be made public)

Attachment

[BlueBay ESG Investment Risk Policy Dec 2014.pdf](#)

Formalised guidelines on corporate governance factors

URL/Attachment

URL

URL

<http://www.bluebay.com/globalassets/documents/proxy-voting-policy.pdf>

Attachment (will be made public)

Attachment

[BlueBay CG CR proxy voting Policy December 2014.pdf](#)

Sector specific RI guidelines

Screening / exclusions policy

URL/Attachment

URL

URL

<http://www.bluebay.com/globalassets/documents/controversial-weapons-investment-policy.pdf>

Attachment (will be made public)

Attachment

[BlueBay Controversial Weapons Investment Policy December 2014.pdf](#)

Other, specify (1)

Other, specify (1) description

Statement on UK Stewardship Code

URL/Attachment

URL

URL

<http://www.bluebay.com/globalassets/documents/statement-uk-stewardship-code.pdf>

Attachment (will be made public)

Attachment

[BlueBay Statement on UK Stewardship Code December 2014.pdf](#)

Other, specify (2)

Other, specify (2) description

Statement on UK MSA

URL/Attachment

URL

URL

<http://www.bluebay.com/en/environmental-social-and-governance/bluebay-transparency-statement-on-the-uk-modern-slavery-act-2015/>

Attachment (will be made public)

Attachment

[BlueBay Modern Slavery Act Transparency Statement Sept 2016.pdf](#)

We do not publicly disclose our investment policy documents

**SG 02.4**

Additional information [Optional].

While we do have Sector Specific RI Guidelines in place and share these externally on an ad-hoc basis with stakeholders such as clients, we have yet to publish them on our website (although this is something we are considering for the future).

We have a dedicated microsite on the BlueBay corporate website which focuses on our ESG investment risk management approach (<http://www.bluebay.com/en/environmental-social-and-governance/approach-performance/#AaPlink>)

Furthermore on the corporate website, we provide information on BlueBay's corporate responsibility efforts i.e. ESG issues as they relate to BlueBay as a company, rather than its investment activities (<http://www.bluebay.com/en/corporate-responsibility/overview/>)

NOTE SG 02.1:

- Proxy Voting: We adopted a proxy voting policy on corporate governance and corporate responsibility in December 2014. We set out that whilst we have this, given BlueBay's specialist focus on fixed income assets, our involvement in proxy voting activities is limited and not material, and confined mainly to response to corporate action. As such, we have not set guidelines on voting position on specific issues e.g. remuneration, board structure etc. Rather we have general principles in place, which focus on promoting action to ensure the long-term viability of the business, and constructive stakeholder relations. Our decisions are informed by taking into consideration local, regional and global standards of practice.
- Engagement: This is included in our ESG Investment Risk policy.
- ESG Sector Briefings: We have started to develop sector specific ESG briefing documents which outline key ESG credit issues and questions to consider and discuss with companies' management. These have yet to be publicly disclosed on our website, although we do share what has been produced to date upon request.

SG 03	Mandatory	Public	Core Assessed	General
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SG 03.1	Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.
---------	-------------------------------------------------------------------------------------------------------------------

Yes

SG 03.2	Describe your policy on managing potential conflicts of interest in the investment process.
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BlueBay has put in place policies to manage conflicts that may arise when trading for multiple clients, including its order execution, order allocation and cross-trade policies.

We believe the risk of potential conflicts of interest at BlueBay is mitigated to some extent by the fact that BlueBay does not:

- provide any services other than discretionary investment management for institutional clients
- undertake own account trading or run a proprietary book
- publish investment research
- participate in commission sharing or soft dollar arrangements
- hold client monies

RBC Capital Markets, an affiliate of BlueBay, has been included on BlueBay's Approved Counterparty List since before the acquisition. BlueBay is entitled to use RBC Capital Markets for brokerage services, as long as trades are executed at arm's length and in compliance with BlueBay's best execution policies and procedures. We do not have any minimum trading threshold to transact with RBC Capital Markets.

BlueBay maintains a register of potential conflicts within the firm which are monitored and controlled on an on-going basis.

BlueBay's arrangements for managing potential conflicts are reviewed at least annually as well as whenever a material change occurs that may affect BlueBay's ability to manage its conflicts.

No

SG 04	Voluntary	Public	Descriptive	General
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<b>SG 04.1</b>	Indicate if your organisation has a process for identifying and managing incidents that occur within portfolio companies.
----------------	---------------------------------------------------------------------------------------------------------------------------

- Yes
- No

<b>SG 04.2</b>	Describe your process on managing incidents
----------------	---------------------------------------------

Identification of material ESG related incidents that occur within portfolio companies primarily resides with our ESG investment risk function, although it can also be identified directly by our investment teams and brought to the attention of our ESG team. Our cross-desk sector analyst forum is another key channel for identification of ESG related incidents which the ESG team may not have been aware of.

Our ESG function proactively monitors investment exposure on a regular basis, tracking new and ongoing investments against ESG performance data sourced from our third party specialist ESG providers, as well as in response to news flow and/or issuer contact which may yield new information. We also consider the extent to which BlueBay has exposure to the issuer across desks and the nature of the positioning (e.g. long, short etc.). Our focus is on issuers with weak absolute performance on key ESG metrics and/or a deteriorating ESG performance over time. Whilst currently the majority of efforts focus on post investment ESG risk monitoring, we also seek to look at this pre-investment.

In terms of responding to material ESG incidents where this has been identified, this is a collaborative effort between our ESG function and the investment teams, primarily with the credit analyst covering the sector/region. In most instances, may require issuer engagement to better understand the situation, the management response and any actions resulting from this. In other cases, engagement may require BlueBay suggesting changes to existing issuer practices to mitigate further risks.

During 2016, some examples where BlueBay was engaged in either identifying and/or responding to ESG related incidents included: Volkswagen (misleading on vehicle emissions in the USA), Valeant Pharmaceuticals (financial accounting irregularities), Vale/BHP Billiton/Samacro (ongoing impact of the dam rupturing at a Samacro mine in Brazil), and Petrobras (ongoing impact of the 'car wash' corruption/bribery scandal). In such instances, we assessed the facts, dialogued with management on any corrective action being taken and communicated our view, and continued to monitor developments.

## Objectives and strategies

<b>SG 05</b>	<b>Mandatory</b>	<b>Public</b>	<b>Gateway/Core Assessed</b>	<b>General</b>
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<b>SG 05.1</b>	Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.
----------------	-------------------------------------------------------------------------------------------------------------------------

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc basis
- It is not reviewed

<b>SG 06</b>	<b>Voluntary</b>	<b>Public</b>	<b>Descriptive</b>	<b>General</b>
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<b>SG 06.1</b>	List the main responsible investment objectives that your organisation set for the reporting year.
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Responsible investment processes

- Provide training on ESG incorporation

Key performance indicator

Training on use and interpretation of issuer ESG data by third party providers

Progress achieved

Refresher/new training provider on ongoing basis for existing/new credit analysts

- Provide training on ESG engagement

Key performance indicator

'Live' training working in conjunction with sector analysts on issuer engagement

Progress achieved

Instances where the ESG team has worked with sector analysts and this has helped inform on investment views

- Improved communication of ESG activities within the organisation

Key performance indicator

Teach-ins with different functions on ESG

Ad-hoc updates within the firm on material internal ESG developments

Circulation of regular ESG investment newsletter

Progress achieved

Numerous teach-ins within different functions, e-communications, which have improved awareness and understanding

- Improved engagement to encourage change with regards to management of ESG issues

Key performance indicator

Case study examples of ESG working with investment teams

Progress achieved

Examples where ESG provided credit relevant insights and/or worked with credit analysts to identify corrective action/emerging ESG risk e.g. banks and climate change

- Improved ESG incorporation into investment decision making processes

Key performance indicator

ESG active participation in sector analyst forums

Case study examples of ESG working with investment teams

Progress achieved

Active involvement of ESG in sector analyst forums, examples where ESG considerations being factored into investment thinking e.g. methane gas regulation in US energy sector, carbon risk in thermal coal sector

Other, specify (1)

Establish an efficient and effective IT process for monitoring investment positions against key ESG performance metrics to identify high risk investments

Key performance indicator

Identifying investment exposures which may represent credit risks due to their ESG performance profile

Progress achieved

Created a more automated process thereby freeing up time for the ESG team to focus on other value add work

Other, specify (2)

other description (2)

Improved ESG incorporation into other investment related functions

Key performance indicator

Integrating ESG within Investment Risk function's review of counterparties

Progress achieved

Systematic analysis of Tier 1 counterparties on ESG grounds; establishment of a systematic process which can be repeated; identification of counterparties of higher ESG risk to monitor

Other, specify (3)

Financial performance of investments

Increase portfolio performance by consideration of ESG factors

Other, specify (1)

other description (1)

Review and evaluate the correlation between financial and ESG performance

Key performance indicator

Monitor issuer/fund ESG performance, and review how this has impacted financials

Explore scope to conduct back-testing analysis

Progress achieved

Tracking fund ESG performance, issuer ESG/financial performance

Held discussions with other stakeholder groups e.g. academia on scope for back-testing analysis on ESG and fixed income

Other, specify (2)

other description (2)

Document where ESG has highlighted risks which have subsequently negatively impacted performance

Key performance indicator

Case study examples where ESG has identify potential credit risks and where risks have subsequently materialised

Progress achieved

Some instances where this has happened e.g. Valeant Pharmaceuticals, The GEO Group

Other, specify (3)

ESG characteristics of investments

- Over or underweight companies based on ESG characteristics
- Improve ESG ratings of portfolio
- Setting carbon reduction targets for portfolio
- Other, specify (1)

Other description (1)

Exploring potential to conduct portfolio carbon footprinting

Key performance indicator

Initiate research into feasibility of conducting analysis in-house on sovereigns

Progress achieved

Development of a credible methodology to conduct analysis in-house using publicly available information for sovereigns which will be piloted

Other, specify (2)

Other description (2)

Taking account of ESG performance

Key performance indicator

All other credit parameters being equal, consider selecting issuer with superior ESG performance

Progress achieved

Generally finding ESG factors are a contributing factor, although not necessarily the deciding factor; governance metrics most frequently considered

Other, specify (3)

Other description (3)

Formalise ESG within private debt investment process

Key performance indicator

Establish a formal and systematic process to embed ESG

Progress achieved

Process implemented in late 2016, covering pre and post investment stage, as well as client reporting

Other activities

Joining and/or participation in RI initiatives

Key performance indicator

Participating in PRI fixed income related working groups (2x)

Review and consider appropriate and relevant initiatives

Progress achieved

Active participation in PRI's ESG FI related working groups - resulted in invitation to co-chair one group

New membership of the CDP as an investor signatory in Dec 2016

- Encouraging others to join a RI initiative

Key performance indicator

Sharing experiences and view of benefits of membership

Spreading awareness and educating others about ESG/RI

Progress achieved

Encouraged other investors to sign up to initiatives such as the PRI co-ordinated Statement on ESG and credit ratings

Improved perception and engagement on ESG/RI related matters

- Documentation of best practice case studies

Key performance indicator

Development of internal case studies on ESG analysis and/or engagement (processes and/or issuer focused), some used for external communications

Progress achieved

Ongoing documentation of case studies

- Using case studies to demonstrate engagement and ESG incorporation to clients

Key performance indicator

Develop presentations to use externally with clients on instances of ESG integration and/or engagement

Progress achieved

Conducted numerous client ESG meetings where this was discussed

- Other, specify (1)

other description (1)

Increase and improve awareness and understanding of ESG in fixed income

Key performance indicator

Publish external articles, participate in media opportunities to promote ESG/RI efforts

Progress achieved

Publication of external media articles sharing our learning on how to address ESG in fixed income investing

Other, specify (2)

other description (2)

Public ESG transparency

Key performance indicator

Continued development of ESG content on corporate website

Progress achieved

Ongoing updates to the website to reflect developments/progress

Other, specify (3)

**SG 06.2** Additional information.

Our formal annual ESG objectives tend to be quite high level, and categorised into terms of areas of ESG investment risk related policies & process; ESG investment process development; ESG data, communications & capacity building, and ESG integration, each with their own further underlying strategic objectives, and specific tasks.

## Governance and human resources

SG 07	Mandatory	Public	Core Assessed	General
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**SG 07.1** Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment.

Roles present in your organisation

- Board members or trustees
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Chief Executive Officer (CEO), Chief Investment Officer (CIO), 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  
COO, Head of Risk & Performance

- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment
- Portfolio managers
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- 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
- External managers or service providers
  - 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)

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

Our CEO is kept updated on ESG investment efforts via direct or e-communication channels on ad-hoc basis as considered necessary.

Our CIO and COO is represented on the Market Risk Committee which meets regularly to receive updates on ESG, as well as participating in ad-hoc discussions as appropriate and necessary.

Our Head of Risk & Performance meets weekly with our ESG specialist.

<b>SG 07.3</b>	Indicate the number of dedicated responsible investment staff your organisation has.
----------------	--------------------------------------------------------------------------------------

Number
--------

2

<b>SG 07.4</b>	Additional information. [Optional]
----------------	------------------------------------

We employed two dedicated ESG staff in 2016.

<b>SG 08</b>	Voluntary	Public	Additional Assessed	General
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**Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee**

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above

**Other C-level staff or head of department****COO, Head of Risk & Performance**

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above

**Portfolio managers**

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above

**Investment analysts**

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above

**Dedicated responsible investment staff**

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- 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.

NOTE SG 08.1: Setting of ESG related goals/objectives and linking of ESG achievement with remuneration is most explicit and formalised at the dedicated ESG staff level. Outside of this, these are set at a more informal basis at the CEO/CIO level.

General

Given where we are in our phase of rolling out ESG investment risk management, our focus has been on development of investment related frameworks and processes, rather than the governance aspects which promote integration. However, this is an area we will review in future.

## Promoting responsible investment

**SG 09**

**Mandatory**

**Public**

**Core Assessed**

**PRI 4,5**

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

**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.

**Select all that apply**

Principles for Responsible Investment

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

- Basic
- Moderate
- Advanced

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

Active participation in two FI and ESG working groups - co-chairing of one of them; wider input into PRI governance and operations.

- AFIC – La Commission ESG
- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change

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

- Basic
- Moderate
- Advanced

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

We only joined in December 2016 as investor signatories.

CDP Forests

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

- Basic
- Moderate
- Advanced

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

We only joined in December 2016 as investor signatories.

CDP Water

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

- Basic
- Moderate
- Advanced

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

We only joined in December 2016 as investor signatories.

- CFA Institute Centre for Financial Market Integrity
- Code for Responsible Investment in SA (CRISA)
- Code for Responsible Finance in the 21st Century
- Council of Institutional Investors (CII)
- ESG Research Australia
- Eumedion
- EVCA – Responsible Investment Roundtable
- Extractive Industries Transparency Initiative (EITI)
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- 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 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  
e.g. CERES coordinated WFE ESG guidance consultation, FSB phase 1 consultation on climate change disclosure, feedback on the Access to Medicines Index 2016

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

- Basic
- Moderate
- Advanced

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

Provided feedback on outputs from the WFE on ESG disclosure by listing companies, shared views on climate change disclosure to FSB, provided comments on the ATM index and ways to make it more relevant to investors.

- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify

SG 10	Mandatory	Public	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 which of the following actions your organisation has taken to promote responsible investment, independently of collaborative initiatives.

- Provided or supported education or training programmes for clients, investment managers, broker/dealers, investment consultants, legal advisers or other investment organisations
- Provided financial support for academic or industry research on responsible investment
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- 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
- Wrote articles on responsible investment in the media.
- Other, specify

specify description

Supported academic/industry research on ESG/RI by participating in interviews; provided investor feedback on ESG to issuers.

No

**SG 10.3** Describe any additional actions and initiatives that your organisation has taken part in during the reporting year to promote responsible investment [Optional]

We have been more public during 2016 in our external communications with clients and other stakeholders via the media in our learning on ESG in fixed income.

SG 11	Voluntary	Public	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
  - Yes, individually
  - Yes, in collaboration with others

**SG 11.2** Select the methods you have used.

- Endorsed written submissions to governments, regulators or public policy-makers developed by others
- Drafted your own written submissions to governments, regulators or public-policy markers
- Participated in face-to-face meetings with government members or officials to discuss policy
- Other, specify

**SG 11.3** Where you have made written submissions (individually or collaboratively) to governments and regulatory authorities, indicate if these are publicly available.

- Yes, publicly available
  - No
- No

**SG 11.4** Provide a brief description of the main topics your organisation has engaged with public policy-makers or regulators on.

e.g.  
 Feedback to the WFE on their proposed ESG guidance for listing companies  
 FSB Taskforce's phase 1 consultation on climate related financial disclosure - provided feedback to the consultation  
 Provided feedback to representatives of UK treasury on development of green bond market, and factors to consider from an investor perspective

**Implementation not in other modules**

SG 12	Mandatory	Public	Descriptive	PRI 1
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**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

<b>SG 12.1</b>	Indicate if your organisation executes scenario analysis and/or modelling in which the risk profile of future ESG trends at portfolio level is calculated.
----------------	------------------------------------------------------------------------------------------------------------------------------------------------------------

- We execute scenario analysis which includes factors representing the investment impacts of future environmental trends
- We execute scenario analysis which includes factors representing the investment impacts of future social trends
- We execute scenario analysis which includes factors representing the investment impacts of future governance trends
- We execute other scenario analysis, specify
- We do not execute such scenario analysis and/or modelling

<b>SG 12.2</b>	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
- We do not consider ESG issues in strategic asset allocation

<b>SG 12.3</b>	Additional information. [OPTIONAL]
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NOTE 12.1:

Scenario analysis/modelling: We are not currently at the stage in our ESG investment risk management where we are able to conduct scenario analysis and/or modelling.

NOTE 12.2:

Strategic asset allocation: We are not currently at the stage in our ESG investment risk management where we are formally/systematically influencing strategic asset allocation.

<b>SG 13</b>	<b>Mandatory to Report Voluntary to Disclose</b>	<b>Public</b>	<b>Additional Assessed</b>	<b>PRI 1</b>
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<b>SG 13.1</b>	Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following you act on.
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- Changing demographics
- Climate change

<b>SG 13.2</b>	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
- 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

other description

Identified and prioritised monitoring of issuers/sectors where climate change represents a material credit risk

None of the above

**SG 13.3**

Indicate which of the following tools you use to manage emissions risks and opportunities

- Carbon footprinting
- Scenario testing
- Disclosure on emissions risk to clients/trustees/management/beneficiaries
- Target setting for emissions risk reduction
- Encourage internal and/or external portfolio managers to monitor emissions risk
- Emissions risk monitoring and reporting are formalised into contracts when appointing managers
- Other, specify

other description

Climate change risk is an input into issuer/sector credit analysis. Data sourced from companies directly/ based on analysis from external organisations (CDP, CTI etc.)

None of the above

- Resource scarcity
- Technology developments
- Other, specify(1)

other description (1)

Governance/Corruption Trends

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

**SG 13.5**

Additional information [Optional]

NOTE SG 13.3: We have initiated efforts into portfolio carbon footprinting and started on sovereigns - the outputs of these are envisaged to be to provide baseline information at this stage.

<b>SG 14</b>	<b>Mandatory to Report Voluntary to Disclose</b>	<b>Public</b>	<b>Descriptive</b>	<b>PRI 1</b>
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**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

**SG 14.1** Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.

Yes

No

<b>SG 15</b>	<b>Mandatory</b>	<b>Public</b>	<b>Descriptive</b>	<b>General</b>
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**SG 15.1** Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.

Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Hedge funds	Similar ESG approach as for long-only managed funds
Other (1) [as defined in Organisational Overview module]	<p>Direct lending: • ESG risk factors are particularly pertinent to private lending strategies given the illiquid nature of the loans and the fact that we are taking a longer-term credit view on our borrowers • Of all the ESG factors, governance-related ones are the most significant per se in terms of having trust and confidence in the management to successfully executive the business strategy • Our investment strategy of having a strong loan position and partnership approach means we engage with borrowers much more closely than lenders in the broader syndicated leveraged loan market, for instance.</p> <p>We apply our Controversial Weapons investment policy. Companies we review for lending do not tend to be covered in terms of their ESG performance, by our third party providers, however our standard due diligence process include consideration of ESG related risk factors. We also leverage of the ESG sector insights generated from our public debt market work. During late 2016 we finalised a formal process to incorporate ESG pre and post investment and it was operational during Q4 2016.</p>

## Innovation

<b>SG 17</b>	<b>Voluntary</b>	<b>Public</b>	<b>Descriptive</b>	<b>General</b>
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**SG 17.1** Indicate whether any specific features of your approach to responsible investment are particularly innovative.

Yes

**SG 17.2** Describe any specific features of your approach to responsible investment that you believe are particularly innovative.

At BlueBay, given we primarily view ESG as an investment risk factor, we have accordingly structured our management of this within our Risk and Performance function, and specifically the Investment Risk team. This explicitly illustrates and reinforces to others internally/externally that we view ESG as an investment risk issue which impacts performance.

With our ESG specialist working closely with the Investment Risk team, we have also established an ESG reporting/monitoring framework for internal team and client reporting, which incorporates conventional quantitative risk reporting, e.g., generation of portfolio-level ESG scores, analysis of

the top 5 issuers in terms of worst/best ESG scores and worst/best contributions to portfolio scores, and highlighting the most ESG-controversial issuers. We complement this with the more narrative ESG reporting we began in late 2014 on the wider ESG efforts within BlueBay.

No

# BlueBay Asset Management LLP

## Reported Information

Private version

Direct - Fixed Income

## 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.

## Overview

FI 01	Mandatory to Report Voluntary to Disclose	Public	Gateway	General
FI 01.1	Provide a breakdown of your internally managed fixed income securities by active and passive strategies			

<p><b>SSA</b></p>	<p>Passive 0</p> <p>Active - quantitative (quant) 0</p> <p>Active - fundamental and active - other 100</p> <p>Total 100%</p>
<p><b>Corporate (financial)</b></p>	<p>Passive 0</p> <p>Active - quantitative (quant) 0</p> <p>Active - fundamental and active - other 100</p> <p>Total 100%</p>
<p><b>Corporate (non-financial)</b></p>	<p>Passive 0</p> <p>Active - quantitative (quant) 0</p> <p>Active - fundamental and active - other 100</p> <p>Total 100%</p>

<b>FI 01.2</b>	Additional information. [Optional]
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BlueBay is an active specialist fixed income manager.

<b>FI 03</b>	<b>Mandatory to Report Voluntary to Disclose</b>	<b>Public</b>	<b>Descriptive</b>	<b>General</b>
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<b>FI 03.1</b>	Indicate the approximate (+/- 5%) breakdown of your SSA investments, by developed markets and emerging markets.
----------------	-----------------------------------------------------------------------------------------------------------------

<b>SSA</b>	Developed markets	35
	Emerging markets	65
	Total	100%

<b>FI 03.2</b>	Indicate the approximate (+/- 5%) breakdown of your corporate and securitised investments by investment grade or high-yield securities.
----------------	-----------------------------------------------------------------------------------------------------------------------------------------

<b>Corporate (financial)</b>		High-yield	33
		Investment grade	67
		Total	100%
<b>Corporate (non-financial)</b>		High-yield	40
		Investment grade	60
		Total	100%

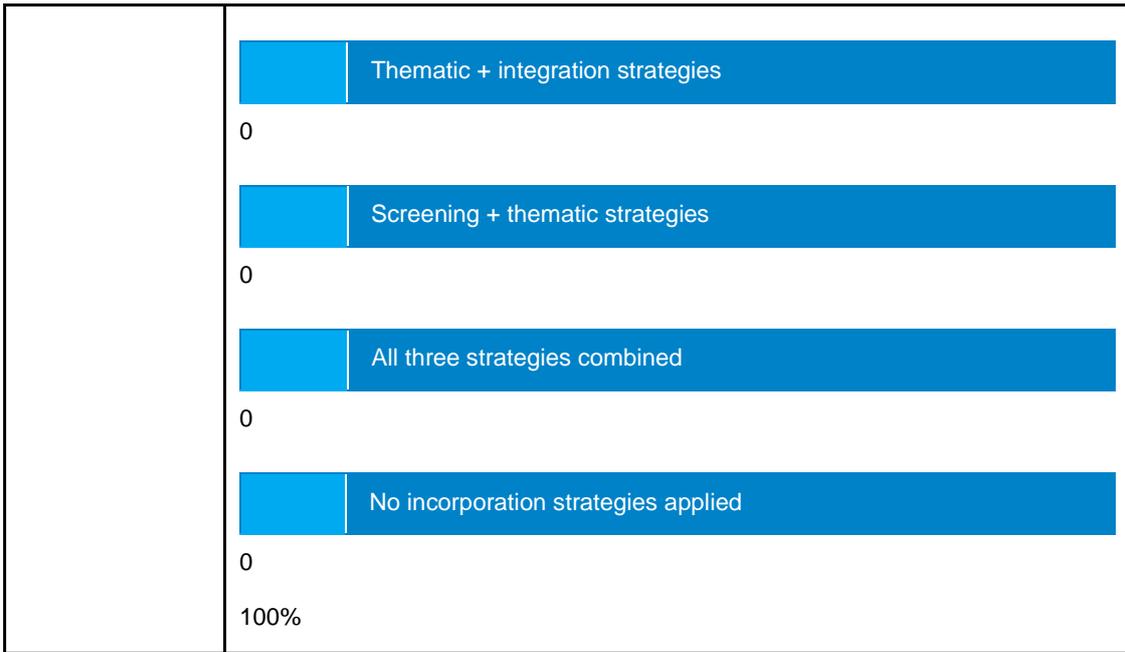
**ESG incorporation in actively managed fixed income**

**Implementation processes**

<b>FI 04</b>	<b>Mandatory</b>	<b>Public</b>	<b>Gateway</b>	<b>PRI 1</b>
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<b>FI 04.1</b>	Indicate 1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and 2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to.
----------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

SSA	<table border="1"> <thead> <tr> <th>Strategy</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Screening alone</td> <td>0</td> </tr> <tr> <td>Thematic alone</td> <td>0</td> </tr> <tr> <td>Integration alone</td> <td>0</td> </tr> <tr> <td>Screening + integration strategies</td> <td>100</td> </tr> <tr> <td>Thematic + integration strategies</td> <td>0</td> </tr> <tr> <td>Screening + thematic strategies</td> <td>0</td> </tr> <tr> <td>All three strategies combined</td> <td>0</td> </tr> <tr> <td>No incorporation strategies applied</td> <td>0</td> </tr> <tr> <td><b>Total</b></td> <td><b>100%</b></td> </tr> </tbody> </table>	Strategy	Percentage	Screening alone	0	Thematic alone	0	Integration alone	0	Screening + integration strategies	100	Thematic + integration strategies	0	Screening + thematic strategies	0	All three strategies combined	0	No incorporation strategies applied	0	<b>Total</b>	<b>100%</b>
Strategy	Percentage																				
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Strategy	Percentage																				
Screening alone	0																				
Thematic alone	0																				
Integration alone	0																				
Screening + integration strategies	100																				



Corporate (non-financial)	Screening alone	0
	Thematic alone	0
	Integration alone	0
	Screening + integration strategies	100
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	0
	No incorporation strategies applied	0
	100%	

**FI 04.2** Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.

The predominant ESG investment strategy we apply (across all assets) is integration as we believe this is best suited to fixed income investing given the technical characteristics of the asset class, and resulting differing investment risk profiles of bonds from a single issuer as it enables more nuanced credit analysis.

We use engagement (in combination with integration) where this is appropriate to do so (such as to mitigate potential credit/ESG risk), but recognise that we have less leverage than equity investors given we are not owners.

Proxy voting is applicable only in some instances such as for our convertibles and high yield (specifically the distressed debt) mandates. This mainly relates to proxy voting in corporate actions, rather than the traditional equity investor context.

We apply a limited level of non-legal ESG exclusion screening (product-based) to our pooled funds as these are the accounts where we control the investment strategy. However, our clients may provide us with bespoke screens (which may also encompass conduct based/norms based) to implement for segregated accounts.

<b>FI 04.3</b>	Additional information [Optional].
----------------	------------------------------------

NOTE FI 04.1: We have deviated from how we have responded to this question in the past. Having sought clarification from the PRI during 2016, we have now interpreted 'screening' approach to include both legal and non-legal screening. In this way, legal economic sanctions screening is included (these generally relate to governance and social issues) as well as non-legal ESG screening (such as on arms, tobacco etc.) - we have been consistent with this interpretation in answering questions FI 07, 08 and 09. Given all BlueBay assets must apply legal screening and we proactively apply ESG integration across all assets, our answer becomes 100% for 'screening + integration'.

But some things to note are:

- Our Controversial Weapons Investment policy only applies to corporates (non-financial) in our flagship/pooled funds
- One flagship fund additionally applies non-legal ESG screening
- Some clients in segregated accounts may also apply their own non-legal ESG screening

<b>FI 05</b>	<b>Mandatory to Report Voluntary to Disclose</b>	<b>Public</b>	<b>Core Assessed</b>	<b>PRI 1</b>
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<b>FI 05.1</b>	Indicate which ESG factors you systematically research as part of your analysis on issuers.
----------------	---------------------------------------------------------------------------------------------

Select all that apply

	SSA	Corporate (financial)	Corporate (non-financial)
Environmental data	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Social data	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Governance data	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

<b>FI 05.2</b>	Indicate what format your ESG information comes in and where you typically source it
----------------	--------------------------------------------------------------------------------------

- Raw ESG company data

**Indicate who provides this information**

- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – FI analyst, PM or risk team
- Other, specify

specify description

Company itself, other stakeholders (e.g. NGOs, academia, regulators)

- ESG factor specific analysis

**Indicate who provides this information**

- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – FI analyst, PM or risk team
- Other, specify

specify description

Other stakeholders e.g. NGOs, regulators, academia, media

- Issuer-level ESG analysis

**Indicate who provides this information**

- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – FI analyst, PM or risk team
- Other, specify

specify description

Company itself, other stakeholders (e.g. NGOs, academia, regulators)

- Sector-level ESG analysis

**Indicate who provides this information**

- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – FI analyst, PM or risk team
- Other, specify

specific description

Company itself, other stakeholders (e.g. NGOs, academia, regulators)

- Country-level ESG analysis

**Indicate who provides this information**

- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – FI analyst, PM or risk team
- Other, specify

specify description

e.g. country itself, stakeholders such as NGOs, academia

**FI 05.3** Provide a brief description of the ESG information used, highlighting any differences in sources of information across your ESG incorporation strategies.

We use a combination of internal and external resources for ESG-related data, which comes from a range of stakeholders. Some of the data we subscribe to and pay for (e.g., ESG research providers - we source sovereign and corporate data from different parties), others are publicly available. We access the data in written form (e.g., reports, PRs) or in person (e.g. meetings).

**FI 05.4** Additional information. [Optional]

NOTE FI 05.2: We have selected 'in-house - FI analyst, PM or risk team' for 'raw ESG co data' information type as our ESG function resides within the risk team, and it provides such data.

<b>FI 06</b>	<b>Mandatory</b>	<b>Public</b>	<b>Additional Assessed</b>	<b>PRI 1</b>
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**FI 06.1** Indicate how you ensure that your ESG research process is robust:

- Issuers are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Issuer information and/or ESG ratings are updated regularly to ensure ESG research is accurate
- Internal audits of ESG research are undertaken in a systematic way
- ESG analysis is benchmarked for quality against other providers
- Other, specify

specify description

Interactions with peers in the industry to gain learning about good/best practice to inform on internal efforts.

- None of the above

**FI 06.2** Describe how your ESG information or analysis is shared among your investment team.

- ESG information is held within a centralised database and is accessible to all investment staff
- ESG information is a standard item on all individual issuer summaries, 'tear sheets', 'dashboards' or similar documents
- Investment staff are required to discuss ESG information on issuers as a standard item during investment committee meetings
- Records capture how ESG information and research was incorporated into investment decisions
- Other, specify  
Our ESG function actively participate in the cross-desk sector analyst forums sharing insights and views, and have ad-hoc interaction with analysts/portfolio managers.
- None of the above

**FI 06.3** Additional information. [Optional]

NOTE F1 06.2: For our private debt business during Q4 2016, we have started to have ESG info as a standard item in issuer investment related documentation. Such practices are currently not yet routine in our public debt activities.

More generally we have a framework to assess ESG investment risk which looks at four levels: issuer, sector, portfolio/desk, and firm-wide.

**(A) Implementation: Screening**

<b>FI 07</b>	<b>Mandatory</b>	<b>Public</b>	<b>Gateway</b>	<b>PRI 1</b>
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**FI 07.1** Indicate the type of screening you conduct.

Select all that apply

	SSA	Corporate (financial)	Corporate (non-financial)	
Negative/exclusionary screening	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Positive/best-in-class screening	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Norms-based screening	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

**FI 07.2** Describe your approach to screening for internally managed active fixed income

Legal reasons

- Economic/financial sanctions: BlueBay must comply with applicable financial/economic sanctions in every jurisdiction where it operates. To ensure compliance, BlueBay restricts business (whether in terms of clients and/or investments) globally with entities and persons subject to embargo/sanctions laws. There are two broad types of sanctions related investment restrictions: comprehensive restrictions (outright ban on investments in these countries), and targeted

restrictions (investments permitted on case by case basis, as sanctions targeted individuals/organisations/sectors as opposed to a blanket ban). Most of these commonly relate to governance and social issues.

- ESG related legal screening: in some jurisdictions, there is a legal reason for funds to exclude investments in some Controversial weapons such as cluster munitions, in such instances, we will ensure compliance.

#### Non-legal reasons

- BlueBay determined: proactively applied to BlueBay pooled funds where we control the investment policy for the funds (beyond those legally mandated). e.g. All apply the Controversial Weapons Investment policy, one also applies the exclusions of the Norwegian Government Pension Fund global/Norges Bank Investment Management.
- Client determined: for segregated account clients, we can tailor screening to those required by the client. If the client wishes, they can adopt BlueBay's Controversial Weapons Investment policy for their own fund.

FI 07.3	Additional information. [Optional]
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#### NOTE FI 07.1

We have included both screening for legal reasons (e.g. sanctions) as well as non-legal screening as this is what we have interpreted this Q to mean.

Some clients with segregated accounts apply ESG screening which encompass negative screening (product-based) and/or to a more limited extent norms based screening (conduct-based).

FI 08	Mandatory	Public	Descriptive	PRI 1
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#### Corporate (financial)

Corporate (fin)
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- For legal reasons
- For non-legal reasons

#### Corporate (non-financial)

Corporate (non-fin)
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- For legal reasons
- For non-legal reasons

FI 08.2	Describe your approach to ESG-based negative screening of issuers from your investable universe.
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#### Legal reasons

- Economic/financial sanctions: BlueBay must comply with applicable financial/economic sanctions in every jurisdiction where it operates. To ensure compliance, BlueBay restricts business (whether in terms of clients and/or investments) globally with entities and persons subject to

embargo/sanctions laws. There are two broad types of sanctions related investment restrictions: comprehensive restrictions (outright ban on investments in these countries), and targeted restrictions (investments permitted on case by case basis, as sanctions targeted individuals/organisations/sectors as opposed to a blanket ban). Most of these commonly relate to governance and social issues.

- ESG related legal screening: in some jurisdictions, there is a legal reason for funds to exclude investments in some Controversial weapons such as cluster munitions, in such instances, we will ensure compliance.

#### Non-legal reasons

- BlueBay determined: proactively applied to BlueBay pooled funds where we control the investment policy for the funds (beyond those legally mandated). e.g. All apply the Controversial Weapons Investment policy, one also applies the exclusions of the Norwegian Government Pension Fund global/Norges Bank Investment Management.
- Client determined: for segregated account clients, we can tailor screening to those required by the client. If the client wishes, they can adopt BlueBay's Controversial Weapons Investment policy for their own fund.

<b>FI 08.3</b>	Additional information. [Optional]
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#### BlueBay's Controversial Weapons Investment policy

In adopting this policy, BlueBay took into account a number of factors such as client and societal expectations as to what is least socially acceptable business activities to have investment exposure to, as well as investment implications in terms of ensuring we meet client investment objectives. In this instance, we felt there was a clear rationale for adopting this policy.

<b>FI 09</b>	<b>Voluntary</b>	<b>Public</b>	<b>Additional Assessed</b>	<b>PRI 1</b>
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<b>FI 09.1</b>	Provide examples of how ESG factors are included in your screening criteria.
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- Example 1

Type of fixed income
<input type="checkbox"/> SSA <input type="checkbox"/> Corporate (financial) <input checked="" type="checkbox"/> Corporate (non-financial)
ESG factors
<input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Social <input type="checkbox"/> Governance
Screening
<input checked="" type="checkbox"/> Negative/ exclusionary <input type="checkbox"/> Norms-based
Description of how ESG factors are used as the screening criteria
<p>Non-legal reasons:</p> <p>Corporate manufacturers of cluster munitions and landlines are excluded under our Controversial Weapons Investment policy. Applicable to all our pooled funds.</p> <p>The data on which issuers to exclude is sourced from a third party, updated on a monthly basis.</p> <p>NOTE: A copy of the BlueBay Controversial Weapons Investment policy is publicly available: <a href="http://www.bluebay.com/globalassets/documents/controversial-weapons-investment-policy.pdf">http://www.bluebay.com/globalassets/documents/controversial-weapons-investment-policy.pdf</a></p>

Example 2

Type of fixed income
<input type="checkbox"/> SSA <input checked="" type="checkbox"/> Corporate (financial) <input checked="" type="checkbox"/> Corporate (non-financial)
ESG factors
<input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Social <input checked="" type="checkbox"/> Governance
Screening
<input checked="" type="checkbox"/> Negative/ exclusionary <input checked="" type="checkbox"/> Norms-based
Description of how ESG factors are used as the screening criteria
<p>Non-legal reasons</p> <p>Applicable to one of our retail funds, which has additional restrictions which are based on the Norwegian Government Pension Fund global/Norges Bank Investment Management exclusions list. The SRI guidelines on which this list is based on includes product-based exclusions (which include coal/coal-based energy, nuclear weapons, tobacco) as well as conduct based exclusions (e.g. human rights, environmental damage, gross corruption, and other serious violations of fundamental ethical norms). The conduct-based exclusions could potentially apply to any corporate issuer irrespective of their sector.</p>

Example 3

Type of fixed income
<input type="checkbox"/> SSA <input checked="" type="checkbox"/> Corporate (financial) <input checked="" type="checkbox"/> Corporate (non-financial)
ESG factors
<input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Social <input checked="" type="checkbox"/> Governance
Screening
<input checked="" type="checkbox"/> Negative/ exclusionary <input type="checkbox"/> Norms-based
Description of how ESG factors are used as the screening criteria
<p><b>Legal reasons</b></p> <p>BlueBay must comply with applicable financial/economic sanctions in every jurisdiction where it operates. To ensure compliance, BlueBay restricts business (whether in terms of clients and/or investments) globally with entities and persons subject to embargo/sanctions laws. There are two broad types of sanctions related investment restrictions: comprehensive restrictions (outright ban on investments in these countries), and targeted restrictions (investments permitted on case by case basis, as sanctions targeted individuals/organisations/sectors as opposed to a blanket ban).</p>

Example 4

Type of fixed income
<input type="checkbox"/> SSA <input checked="" type="checkbox"/> Corporate (financial) <input checked="" type="checkbox"/> Corporate (non-financial)
ESG factors
<input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Social <input checked="" type="checkbox"/> Governance
Screening
<input checked="" type="checkbox"/> Negative/ exclusionary <input checked="" type="checkbox"/> Norms-based
Description of how ESG factors are used as the screening criteria
<p><b>Legal and non-legal reasons</b></p> <p>Some of our segregated account clients may also require us to apply legal and/or non-legal screenings (product and conduct based) which are applicable to them in the countries in which they are domiciled. In such instances, they supply us with the restrictions list.</p>

Example 5

FI 10	Mandatory	Public	Core Assessed	PRI 1
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FI 10.1	Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.
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Type of screening	Checks
<b>Negative/exclusionary screening?</b>	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> Data used for the screening criteria is updated at least every 2 years <input checked="" type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input checked="" type="checkbox"/> Other, specify <div style="background-color: #0070C0; color: white; padding: 2px; margin-top: 5px;">other description</div> Checks made upon requests by clients which may be ad-hoc or at regular intervals. <input type="checkbox"/> None of the above
<b>Norms-based screening</b>	<input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> Data used for the screening criteria is updated at least every 2 years <input checked="" type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above

**FI 10.2** Additional information. [Optional]

BlueBay monitors compliance with exclusion lists and other investment guidelines using our portfolio management system, Charles River Investment Management System (Charles River). Automated Charles River compliance rules are independently managed by the BlueBay Compliance Team. Investment restrictions are programmed into Charles River using system-enforced 4-eyes review and validation functionality. Investment guidelines that cannot be programmed into Charles River are monitored using alternative techniques that are implemented and reviewed by the Compliance Team.

The data associated with our Controversial Weapons Investment policy is sourced from a third party provider (MSCI ESG Research), with data updated on a regular basis (e.g. monthly). Segregated accounts provide their bespoke restrictions lists either on a regular basis or on an ad-hoc basis.

In a limited (but growing) number of instances, we perform checks to ensure issuers meet screening for clients with specific exclusions/concerns lists. This is performed at different frequencies.

NOTE FI 10.1: Norms based criteria applies to the one pooled fund applying the Norwegian Government Pension Fund global/Norges Bank Investment Management exclusions list, and to a select few of segregated account mandates which may include this in their restrictions list.

**(C) Implementation: Integration**

FI 14	Mandatory	Public	Descriptive	PRI 1
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**FI 14.1**

Describe your approach to integrating ESG into traditional financial analysis.

This occurs at four levels:

- Issuer level: our investment teams are provided with access to the IT platforms of our ESG research providers for issuer/industry ESG data which they can review as part of their issuer research analysis. They can then determine whether these would be material considerations in terms of the risk-reward/valuation consideration. They may also receive issuer/sector/issue ESG-related insights from the ESG specialist when this is considered useful to share. We use the issuer ESG data from external third parties (which provide individual E, S and G scores ranging from 0 to 10 with 10 representing the best ESG-scoring issuer) to generate an issuer overall ESG score. As we believe Governance is more critical than Social and Environment for fixed income investments, we have established our own weighting methodology to arrive at the overall issuer ESG score (50% of overall ESG score is derived from the G score, 25% each from the E and S scores).
- Sector level: mainly via the cross desk sector analyst forums as previously discussed
- Portfolio level: investment teams receive ESG data for their funds on a regular basis in terms of overall portfolio ESG scores (detailing top 5 long positions in low ESG-scoring issuers, short positions in high scoring issuers, best and worst contributors to fund ESG performance, and whether there are holdings in companies highlighted as being involved in severe ESG controversies, as defined by our external research provider). Such data can then be incorporated into portfolio construction as appropriate. Portfolio-level ESG scores are generated by taking individual issuer scores and weighting these in terms of percentage exposure of portfolio to the issuer. Where an issuer is not covered by MSCI ESG Research, we generate an internally-calculated score using industry averages.
- Group level: oversight of the ESG performance of funds across the desks is provided by the Market Risk Committee which reviews ESG risks and trends on a regular basis.

Given our primary ESG investment strategy being ESG integration, the role of our internal RI resource is to provide an input into the investment decision making by highlighting potential credit relevant ESG risks to investment teams. It is then for the investment team to consider the extent to which this is relevant to their investment decision in terms of potential valuation implications, as well as nature of the investment positioning. As the risk takers, the investment teams make the ultimate investment decision, which will be a balance of conventional financial and ESG factors. This means that our funds may still invest in issuers with low ESG performance scores as well as those with high ESG performance scores.

Currently the majority of our ESG efforts focus on post-investment (e.g. existing investment exposure), although we are also looking to complement this with pre-investment (new positions) ESG analysis.

**FI 14.2**

Describe how your ESG integration approach is adapted to each of the different types of fixed income you invest in.

**SSA**

For sovereign bond investments, geo-political and social factors ( e.g. civil conflict, terrorism, issues of corruption etc.) are particularly credit relevant, as these factors can be dynamic and alter rates and currency parameters and so the credit attractiveness of countries.

Environmental factors are generally considered the least credit relevant as the timescale over which the dynamics change does not overlap that much with investment time horizons for sovereigns. However, some environmental risks such as droughts/floods associated with changing climate can be more immediately credit relevant, particularly where the economies of those countries are materially reliant on agriculture, mining or hydropower for instance.

Corporate (financial)

Governance aspects of financial corporates are particularly credit relevant given the need to have confidence in the quality and integrity of the business. Public transparency of governance structures, mechanisms and approaches to managing lending/investment risk are key. Understanding of lending/investment exposures is important.

Corporate (non-financial)

Whilst Governance is a basic area of analysis (particularly in the case of distressed debt/private lending), the extent to which Environment or Social issues are credit relevant will depend on factors such as the business activities, geographical footprint, size of the company and so on.

FI 14.3 Additional information [OPTIONAL]

For all bond investments we consider 'Governance' as the most critical ESG risk factor. Generally speaking, different aspects/dimensions of an E, S and G issue may be more or less credit relevant for different debt instruments. In addition to adapting our approach for different debt instruments, we also modify our expectations of issuers in terms of their sector and geographic exposure - given ESG factors may be more credit relevant in the former, and also to reflect the state of ESG standards and awareness. We also adapt the ESG screening we apply for our pooled funds, such that our Controversial Weapons Investment policy only applies to corporates (manufacturer of landmines and cluster munitions), and not sovereigns, as they cannot be considered in the same way. We do not currently adopt any ESG screening for sovereigns.

FI 15	Mandatory	Public	Core Assessed	PRI 1
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FI 15.1 Indicate how ESG information is typically used as part of your investment process.

Select all that apply

	SSA	Corporate (financial)	Corporate (non-financial)	
ESG analysis is integrated into fundamental analysis	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
ESG analysis is integrated into security weighting decisions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ESG analysis is integrated into portfolio construction decisions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ESG analysis is a standard part of internal credit ratings or assessment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ESG analysis for issuers is a standard agenda item at investment committee meetings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ESG analysis is regularly featured in internal research notes or similar	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
ESG analysis is a standard feature of ongoing portfolio monitoring	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
ESG analysis features in all internal issuer summaries or similar documents	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other, specify	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

**FI 15.2**

Additional information [OPTIONAL]

NOTE FI 15.1:

- ESG is a standing agenda item in our regular sector analyst forum meetings, and meetings (as well as the meeting minutes) will reference ESG discussions as appropriate. Furthermore, we share email communications on the latest ESG sov/sector insights. In that sense, we have selected 'ESG analysis is regularly featured in internal research notes or similar'
- We have not selected 'ESG analysis features in all internal issuer summaries or similar documents' as whilst it became standard for our private debt business during Q4 in 2016, we have yet to roll this out across our public debt business, which is representative of the majority of our assets (although this has been prioritised for action for 2017)
- 'Other, specify': Sector ESG briefings; ESG discussed on regular basis at the Market Risk Committee; ESG metrics added to standard credit metrics to inform on analysis of relative sovereign risks (e.g. political risk and comparison with fair value analysis)

General comments

BlueBay's formal ESG framework/process was introduced relatively recently (2013) and as such the focus has been on building internal capability and processes, which have occurred on an ad hoc rather than systematic basis.

The emphasis has been on post-investment (existing holdings) ESG risk management, although we have initiated efforts on the pre-investment front in terms of making ESG assessment a standard part of internal credit analysts issuer research notes - this is operational for our private debt team as of late 2016.

The framework we have developed seeks to share ESG insights among our investment teams on 4 levels: issuer, sector, portfolio/desk and firm wide level.

FI 16	Mandatory	Public	Additional Assessed	PRI 1
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FI 16.1	Indicate the extent to which ESG issues are reviewed in your integration process.
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	Environment	Social	Governance
SSA	<div style="background-color: #0070c0; color: white; padding: 2px;">Environmental</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<div style="background-color: #0070c0; color: white; padding: 2px;">Social</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<div style="background-color: #0070c0; color: white; padding: 2px;">Governance</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all
Corporate (financial)	<div style="background-color: #0070c0; color: white; padding: 2px;">Environmental</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<div style="background-color: #0070c0; color: white; padding: 2px;">Social</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<div style="background-color: #0070c0; color: white; padding: 2px;">Governance</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all
Corporate (non-financial)	<div style="background-color: #0070c0; color: white; padding: 2px;">Environmental</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<div style="background-color: #0070c0; color: white; padding: 2px;">Social</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<div style="background-color: #0070c0; color: white; padding: 2px;">Governance</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all

FI 16.2	Please provide more detail on how you review E, S and G factors in your integration process.
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SSA

We source sovereign issuer ESG data from third party providers like Verisk Maplecroft (as well as Eurasia Group although the focus in this instance is on commentary rather than production of ESG ratings for sovereigns), which provides overall scores for each sovereign, as well as company profiles which break down performance in different areas. They also produce annual reviews and ad hoc analysis. The scores are available to the investment teams via an online platform and our investment risk IT system. The ESG function leads on monitoring and sharing ESG performance with the desks from the provider.

We may also participate in webinars or request meetings from Verisk Maplecroft and Eurasia on issue of interest. For instance, during 2016, we organised a meeting to discuss ESG concerns in countries such as Turkey with Verisk Maplecroft.

Corporate (financial)

We source corporate issuer ESG data from a third party provider, MSCI ESG Research, which provides overall ESG ratings and scores (including for individual E, S and G pillars) for each issuer, as well as company profiles which break down performance in different areas. They also produce annual sector reviews and ad hoc analysis. The scores are available to the investment teams via an online platform and our investment risk IT system.

The ESG function leads on monitoring and sharing data on ESG performance with the desks from the provider.

Via the cross team sector analyst forum initiative the ESG team shares ESG insights formally on a regular (mostly monthly) basis. This network has also initiated efforts to develop sector ESG briefing documents, which set out our view of the most credit relevant ESG risk for the sector, how we believe this impacts valuation, and the key questions for consideration/engagement. To date, we have produced such a note for the Energy& Mining sector, and are in the process of finalising the remaining sector briefings.

Corporate (non-financial)

We source corporate issuer ESG data from a third party provider, MSCI ESG Research, which provides overall ESG ratings and scores (including for individual E, S and G pillars) for each issuer, as well as company profiles which break down performance in different areas. They also produce annual sector reviews and ad hoc analysis. The scores are available to the investment teams via an online platform and our investment risk IT system.

The ESG function leads on monitoring and sharing data on ESG performance with the desks from the provider.

Via the cross team sector analyst forum initiative the ESG team shares ESG insights formally on a regular (mostly monthly) basis. This network has also initiated efforts to develop sector ESG briefing documents, which set out our view of the most credit relevant ESG risk for the sector, how we believe this impacts valuation, and the key questions for consideration/engagement. To date, we have produced such a note for the Energy& Mining sector, and are in the process of finalising the remaining sector briefings.

Fixed income - Engagement

FI 18	Mandatory to Report Voluntary to Disclose	Public	Core Assessed	PRI 2
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**FI 18.1**

Indicate if you engage on your fixed income assets. Please exclude any engagements carried out solely in your capacity as a shareholder.

Category	Proportion of assets
<p><b>SSA</b></p>	<p> <input type="radio"/> &gt;50%  <input type="radio"/> 26-50%  <input checked="" type="radio"/> 5-25%         </p> <p><b>FI 18.2</b>   Indicate your motivations for conducting engagement.</p> <p> <input checked="" type="checkbox"/> To gain insights into ESG (i.e. enhance disclosure)  <input checked="" type="checkbox"/> To effect change (i.e. ask an issuer to manage ESG risk and/or opportunity)  <input type="checkbox"/> Other, specify  <input type="radio"/> More than 0%, less than 5%  <input type="radio"/> We do not engage         </p>
<p><b>Corporate (financial)</b></p>	<p> <input type="radio"/> &gt;50%  <input type="radio"/> 26-50%  <input checked="" type="radio"/> 5-25%         </p> <p><b>FI 18.2</b>   Indicate your motivations for conducting engagement.</p> <p> <input checked="" type="checkbox"/> To gain insights into ESG (i.e. enhance disclosure)  <input checked="" type="checkbox"/> To effect change (i.e. ask an issuer to manage ESG risk and/or opportunity)  <input type="checkbox"/> Other, specify  <input type="radio"/> More than 0%, less than 5%  <input type="radio"/> We do not engage         </p>
<p><b>Corporate (non-financial)</b></p>	<p> <input type="radio"/> &gt;50%  <input type="radio"/> 26-50%  <input checked="" type="radio"/> 5-25%         </p> <p><b>FI 18.2</b>   Indicate your motivations for conducting engagement.</p> <p> <input checked="" type="checkbox"/> To gain insights into ESG (i.e. enhance disclosure)  <input checked="" type="checkbox"/> To effect change (i.e. ask an issuer to manage ESG risk and/or opportunity)  <input type="checkbox"/> Other, specify  <input type="radio"/> More than 0%, less than 5%  <input type="radio"/> We do not engage         </p>

**FI 18.3**

Additional information.[OPTIONAL]

BlueBay believes that providers of debt do have a role in engaging with issuers on matters with the potential to impact investment returns. As part of the routine investment research process, our investment teams do meet issuers (particularly with primary issuances) and are therefore able to raise questions, including on ESG related matters. Given BlueBay's approach of not automatically excluding issuers from investment based on their ESG performance, actions to mitigate such risks are raised with investments teams where appropriate. Our focus is on the most investment relevant ESG risk factors, with engagement conducted to inform on our investment decisions.

However client expectations of the scale and effectiveness of such engagement should be made in recognition of the fact that as debt investors, we are not owners and as such have more limited legal mechanisms to influence issuers. Furthermore, trying to engage a non-corporate issuer such as a sovereign is potentially more challenging than influencing a company.

The aim of engagement will to generate:

- Additional insights into the issuer's ESG practices which may have investment implications and/or,
- To facilitate change by setting out a request for change/improvement in specific ESG areas e.g. climate change or human rights supply chain management.

The majority of engagement conducted is for purposes of improving insight and most are focused on improving conventional credit insight as compared with a more ESG explicit focus.

FI 19	Mandatory to Report Voluntary to Disclose	Public	Additional Assessed	PRI 1,2
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**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

**FI 19.1** Indicate how you typically engage with issuers as a fixed income investor, or as both a fixed income and listed equity investor. (Please do not include engagements where you are both a bondholder and shareholder but engage as a listed equity investor only.)

Select all that apply

Type of engagement	SSA	Corporate (financial)	Corporate (non-financial)
Individual/Internal staff engagements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Collaborative engagements	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Service provider engagements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We do not engage with issuers as a fixed income investor or as both a fixed income and listed equity investor	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**FI 19.2** Indicate how your organisation prioritises engagements with issuers

Select all that apply

	SSA	Corporate (financial)	Corporate (non-financial)
Based on potential materiality of ESG factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Based on systemic risks to global portfolios	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Based on our exposure (holdings) to ESG risks	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We do not prioritise engagements with issuers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If 'other' has been selected, please give a description

Other: Whether this is likely to be a long-term/core holding, whether this is likely to be investable, reactive to an event/development, part of pre-determined ESG work programme etc.

**FI 19.3**

Indicate when your organisation conducts engagements with issuers.

Select all that apply

	SSA	Corporate (financial)	Corporate (non-financial)
Engagements are conducted pre-investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Engagements are conducted post-investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, describe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We do not conduct engagements with issuers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**FI 19.4**

Indicate how your organisation conducts engagements with issuers.

Select all that apply

	SSA	Corporate (financial)	Corporate (non-financial)
We systematically engage prior to ESG-related divestments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We engage proactively in anticipation of specific ESG risks and/or opportunities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We engage in reaction to ESG issues which have already affected the issuer	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Investment and ESG analysts systematically conduct ESG-related engagements together	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, describe	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We do not conduct engagements with issuers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If 'other' has been selected, please give a description

Opportunistically e.g. may engage on a standing ESG theme we prioritise as important, or when there is an opportunity (e.g. issuer ESG roadshow/meeting) where we may potentially invest in the future.

**FI 19.5**

Indicate what your organisation conducts engagements with issuers on.

Select all that apply

	SSA	Corporate (financial)	Corporate (non-financial)
We conduct engagements with individual issuers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We conduct engagements across sectors and industries	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
We conduct engagements on specific ESG themes (e.g. human rights)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, describe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We do not conduct engagements with issuers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**FI 19.6**

Indicate how your organisation shares the outcomes of the engagements internally.

Select all that apply

	SSA	Corporate (financial)	Corporate (non-financial)
We have a systematic process to ensure the outcomes of engagements are made available	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We occasionally make the outcomes of engagements available	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, describe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We do not make this information available	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We do not share the outcomes of the engagements internally	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**FI 19.7**

Additional information.[OPTIONAL]

ESG engagement overview

The engagement maybe:

- Investor led, this can be as part of a proactive or reactive engagement programme involving a single or group of investors looking to address a specific issue/theme within a certain sector or more generally e.g. extractives industry and human rights management
- Company led, this is often as part of a proactive effort by the company to engage with investors on its ESG practices e.g. annual ESG investor road show, or a stakeholder consultation exercise covering its ESG strategy or a specific ESG issue (e.g. access to medicines in the pharma sector)

The engagement may take the form of face-to-face meetings with management or through conference calls and e-communications. The discussions may be solely between issuer and investor, or involve other investor and stakeholder groups.

Where ESG engagement is deemed necessary, this will be prioritised using a risk-based approach. This means taking account of the following:

- Focusing on issuers considered to have the most exposure to significant ESG controversies (e.g. for corporates, our third party provider assigns a 'red' flag status to such companies)
- The absolute/relative size of our exposure to the issuer (fund level/firm wide level)
- Our investment thesis e.g. do we have strong conviction in the issuer and is this a long-term holding or is it a short term trade idea based solely on valuations
- The ESG ratings and scores of the company overall, and/or on specific E, S and G areas where we may have a proactive engagement programme centred around a specific issue/theme

Communication of engagement outcomes

We provide quarterly ESG reports to segregated account clients, which provide some illustration of engagement activities and their outcomes. Our investment teams/ESG specialist may also meet with clients in meetings to brief them on our effort.

Some of our engagement efforts are reported on our corporate website, although the current focus has been on detailing the activities rather than the outcomes.

Internally we also share the results of our engagement efforts. Where this is with our analysts, we may do this on ad-hoc basis either in person or by electronic communications with the most relevant individuals, or via the relevant cross-desk sector analyst forum where wider discussions make sense. We may also share examples with other individuals in the investment team or other functions on an ad-hoc basis via electronic communication and/or in person discussions via case study examples.

FI 20	Mandatory to Report Voluntary to Disclose	Public	Additional Assessed	PRI 1,2
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FI 20.1	Indicate if your publicly available policy documents explicitly refer to fixed income engagement separately from engagements in relation to other asset classes.
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Yes

FI 20.2	Please attach or provide a URL to your fixed income engagement policy document. [Optional]
---------	--------------------------------------------------------------------------------------------

URL
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<http://www.bluebay.com/globalassets/documents/esg-investment-risk-policy.pdf>

Attach document
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[BlueBay ESG Investment Risk Policy Dec 2014.pdf](#)

No

FI 20.3	Additional information [OPTIONAL]
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We do not have a stand-alone ESG engagement policy, as this is covered within our overall ESG investment risk policy.

## Outputs and outcomes

FI 21	Mandatory to Report Voluntary to Disclose	Public	Additional Assessed	General
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FI 21.1	Indicate whether your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance.
---------	-------------------------------------------------------------------------------------------------------------------------------------------------------------

Select all that apply

	SSA	Corporate (financial)	Corporate (non-financial)	
We measure whether incorporating ESG impacts funds' reputation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
We measure whether incorporating ESG impacts financial returns	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
We measure whether incorporating ESG impacts risk	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
We measure whether incorporating ESG impacts funds' ESG performance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
None of the above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**FI 21.2**

Describe how your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance. [OPTIONAL]

Our efforts to date have been on an ad-hoc rather than systematic basis. They have also involves a combination of approaches such as:

- Quantitative: overall fund ESG/E/S/G performance scores; top 5 best/worst contributor (issuer) to fund ESG score, top 5 long/short positions in low/high ESG scoring issuers, exposure to corporate issuers with the highest ESG controversy status. EXAMPLE: our EM Sovereign team continue to use political/governance scores from our sovereign ESG research provider, which they plot against the spreads of their fair value scores for the hard currency universe. This has continued to help inform insight into the degree to which the political/governance scores for certain issuers are impacting spreads.
- Qualitative: we monitor, the impact of the ESG analysis we do with our investment teams in terms of impact on investment views and outcomes for specific issuers or sectors. In such instances, in the majority of cases we have observed that whilst there has not been a change in the investment allocation, the credit analysts have gained increased awareness and appreciation of the potential risk of the ESG issue to the credit risk, and this has been incorporated the overall view of the issuer.

**FI 21.3**

Additional information.[OPTIONAL]

As we have yet to systematically track outcomes of ESG analysis and engagement, we tend to find this out on an ad-hoc basis from dialogue with the investment teams, such as through the cross-desk sector analyst forum meetings, and/or one-to-one dialogue.

As stated in FI 21.2, in the majority of instances we have not necessarily observed a change in the investment view/allocation decision but they have informed on our understanding and thinking.

**FI 22**
**Voluntary**
**Public**
**Descriptive**
**PRI 1,2**

FI 22.1

Provide examples of how your incorporation of ESG analysis and/or your engagement of issuers has affected your fixed income investment outcomes during the reporting year.

Example 1

Type of fixed income	
<input checked="" type="checkbox"/> SSA	
<input type="checkbox"/> Corporate (financial)	
<input type="checkbox"/> Corporate (non-financial)	
ESG issue and explanation	
<p>Turkey - the re-election of the ruling party raised concerns following evidence of growing intolerance of political opposition, public protest and critical media. July 2016 failed coup resulted in reintroduction of death penalty for those found to be involved. The ESG team shared ESG related insights sourced from our third party provider as well as facilitated discussions between them and our investment team to gain a better understanding of the ESG risks.</p>	
RI strategy applied	
<input type="checkbox"/> Screening	
<input checked="" type="checkbox"/> Integration	
<input type="checkbox"/> Engagement	
Impact on investment decision or performance	
<p>Limited - whilst it has not changed the nature of the investment decision short-term, there has been greater recognition of the wider medium/long-term social and governance dynamics in the country.</p>	

Example 2

Type of fixed income
<input type="checkbox"/> SSA <input checked="" type="checkbox"/> Corporate (financial) <input type="checkbox"/> Corporate (non-financial)
ESG issue and explanation
<p>Banks - as part of our ongoing monitoring of banks following the financial crisis which revealed poor business conduct and insufficient risk management oversight, we prioritised sharing insights and information gained from attending external events. Some of these activities focussed on better understanding outstanding litigation risk as a result of poor business practices and regulatory non-compliance, whilst others were directed towards better understanding governance and management quality by exploring how to establish an effective and responsible culture which promotes ethical conduct to rebuild trust and reputation. Some of our efforts also highlighted ongoing carbon financing risk in the sector, linked to falling oil prices as well as increasing carbon regulatory risk which could impair assets.</p>
RI strategy applied
<input type="checkbox"/> Screening <input checked="" type="checkbox"/> Integration <input type="checkbox"/> Engagement
Impact on investment decision or performance
<p>Not necessarily changed investment positions but informed on views in terms of how to think about culture and monitor litigation risk, improved awareness of issuer reputational risk from carbon financing activities (although actual financial impact unlikely to be material short-term).</p>

Example 3

Type of fixed income
<input type="checkbox"/> SSA <input type="checkbox"/> Corporate (financial) <input checked="" type="checkbox"/> Corporate (non-financial)
ESG issue and explanation
<p>Volkswagen - post the diesel emissions scandal, our ESG team dialogued with our analyst covering the issuer to better understand the company's wider ESG practices, as well as more specific ones in relation to governance and business conduct. We discussed the potential size of the litigation risk, as well as scope for governance reforms, and identified potential milestones to consider going forward.</p>
RI strategy applied
<input type="checkbox"/> Screening <input type="checkbox"/> Integration <input checked="" type="checkbox"/> Engagement
Impact on investment decision or performance
<p>Whilst this scandal did not changed our investment thesis for VW, it is a credit-relevant issue which has informed on our view of its governance quality, since it indicates that critical questions were probably not asked at the right stage of engine/product development and an accumulation of failures went unchecked.</p>

Example 4

Type of fixed income
<input type="checkbox"/> SSA <input type="checkbox"/> Corporate (financial) <input checked="" type="checkbox"/> Corporate (non-financial)
ESG issue and explanation
<p>Mining - during the year our ESG team met with a representative of the ICMM, the leading industry trade body promoting sustainable social and environmental practices in the mining sector, to discuss views on how the industry could improve its ESG management practices.</p>
RI strategy applied
<input type="checkbox"/> Screening <input type="checkbox"/> Integration <input checked="" type="checkbox"/> Engagement
Impact on investment decision or performance
<p>Not necessarily expected to impact investment views given the discussion was high level on industry as a well and more focused on medium to longer term timeframe.</p>

Example 5

Type of fixed income
<input type="checkbox"/> SSA <input type="checkbox"/> Corporate (financial) <input checked="" type="checkbox"/> Corporate (non-financial)
ESG issue and explanation
<p>GNL Quintero - this is a Chilean company involved in LNG. We participated in a stakeholder consultation initiative on ESG as an investor stakeholder following an invitation from the company. The survey topics included soliciting our views on what we felt were the critical ESG issues for the company.</p>
RI strategy applied
<input type="checkbox"/> Screening <input type="checkbox"/> Integration <input checked="" type="checkbox"/> Engagement
Impact on investment decision or performance
<p>No change in investment decision but improved investment view as shown issuer was being proactive in managing ESG.</p>

FI 22.2	Additional information.
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NOTE: We have opted to provide examples to illustrate the range of instances in terms of issuer type, geographic region, stakeholder type and ESG topic etc.

## Communication

FI 23	Mandatory	Public	Core Assessed	PRI 2,6
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FI 23.1	Indicate if your organisation proactively discloses information on your approach to RI across all of your fixed income investments.
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We disclose it publicly

Provide URL
-------------

<http://www.bluebay.com/en/environmental-social-and-governance/overview/#Olink>

**FI 23.2**

Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.

- Yes
- No

**FI 23.3**

Indicate the information your organisation proactively discloses to the public regarding your approach to RI incorporation.

- Broad approach to RI incorporation
- Detailed explanation of RI incorporation strategy used

**FI 23.4**

Indicate how frequently you typically report this information to the public.

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc/when requested

**FI 23.5**

Indicate the information your organisation proactively discloses to clients/beneficiaries regarding your approach to RI.

- Broad approach to RI incorporation
- Detailed explanation of RI incorporation strategy used

**FI 23.6**

Indicate how frequently you typically report this information to clients/beneficiaries.

- Quarterly or more frequently
  - Biannually
  - Annually
  - Less frequently than annually
  - Ad-hoc/when requested
- We disclose it to clients and/or beneficiaries only
  - We do not proactively disclose it to the public and/or clients/beneficiaries

**FI 23.7**

Additional information. [Optional]

The intention of the reporting on our website is to provide a broad overview of our policies, systems and performance, where possible, and to fill this in with greater detail over time. As such, our ESG presentation material which we share with clients and other key stakeholders will tend to provide more in-depth information on specific processes, and case studies. However over time, we hope to be able to narrow the difference in disclosure of publicly vs. privately where it is appropriate to do so (in line with compliance/legal requirements). We seek to update our website as appropriate and necessary. During 2016, this was done quarterly or more frequently.

In terms of client reporting, for some we have regular reporting cycles e.g. quarterly, annual, and for others, this is on an ad-hoc basis.

NOTE FI 23.6: BlueBay produces quarterly ESG reporting for clients with segregated accounts, but we may also produce this on an ad-hoc basis upon client requests.



# BlueBay Asset Management LLP

## Reported Information

### Private version

### Closing Module

## 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.

## Assurance

CM 01

Mandatory

Public

Core Assessed

General

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

CM 01.1

Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:

- Independent assurance by a third party over selected responses from this year's PRI Transparency Report
- Independent assurance by a third party over data points from other sources that have subsequently been used in your PRI responses this year
- Independent process assurance by a third party (specific to assurance of RI processes that have been reported to the PRI this year)
- Internal process assurance conducted by internal auditors (specific to assurance of RI processes that have been reported to the PRI this year)
- Internal verification/review of responses before submission to the PRI (e.g. by the CEO or the board)
  - Whole PRI Transparency Report has been internally verified

CM 01.9

Whole PRI Transparency Report has been internally verified Who has conducted the verification

- CEO or other Chief-Level staff
- The Board
- Investment Committee
- Compliance Function
- RI/ESG Team
- Investment Teams
- Legal Department
- Other (specify)
  - Head of Global Business Development
- Selected data has been internally verified
- Other, specify
- None of the above

CM 01.2

We plan to assure this year's PRI Transparency report

- Whole PRI Transparency Report will be assured
- Selected data will be assured
- We do not plan to assure this year's PRI Transparency report

**CM 01.3** We undertook independent assurance by a third party on last year's PRI Transparency Report

- Whole PRI Transparency Report was assured last year
- Selected data was assured in last year's PRI Transparency Report
- We did not assure last year's PRI Transparency report, or we did not have such a report last year.

**CM 01.4** We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:

- We adhere to an RI certification or labelling scheme
- 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
- ESG audit of holdings
- Other, specify
- None of the above

**CM 01.18** Additional Information [OPTIONAL]

The basis of some of the content in the report have previously been reporting during 2016 externally to clients and other stakeholders. We review documents which record activities mentioned such as issuer ESG engagement.

NOTE CM 01.1: We have selected this as appears from the notes and single reference in the section that it applies where there has been an internal review (but not a verification in the technical sense) of the responses. In our case, the draft responses to the PRI Transparency report have been reviewed internally by individuals including our CEO, CIO, COO, Head of Global Business Development, Head of Risk & Performance and a representative from our Compliance team.

**Feedback**

**Contact details**

<b>CM 04</b>	<b>Mandatory</b>	<b>Public</b>	<b>Descriptive</b>	<b>General</b>
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**CM 04.1** Provide a primary and secondary contact person.

Primary contact for this submission

First name	My-Linh
Last name	Ngo
Email address	Mngo@BlueBay.com

Secondary contact for this submission [optional]

First name	ESG
Last name	
Email address	ESG@BlueBay.com

Contact for Data Portal

First name	My-Linh
Last name	Ngo
Email address	Mngo@BlueBay.com

Final review and submission

CM 05	Mandatory	Public	Descriptive	General
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**CM 05.1** Thank you for completing the PRI reporting framework. Click the links below to review how your reported information will be presented in two separate reports: the public RI Transparency Report (to be published on the PRI website) and the Private RI report (confidential, for internal review and use). If you have responded incorrectly to any indicators, please return to these indicators in the Online Reporting Tool and adjust accordingly

Download your reports:

Your private RI report (confidential)			
Your public RI Transparency report (to be published on the PRI website)			

**CM 05.2** Indicate if you give PRI permission to publish your RI Transparency Report. Once your report is submitted, you will not be able to modify your responses and information you have marked as public will automatically be published on the PRI website

I give the PRI permission to publish any information I have marked as public.

CM 06	Mandatory		Descriptive	General
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You can submit your responses to the PRI reporting framework by clicking "I hereby submit my response" and the "Confirm" button.

I hereby submit my response