



RI TRANSPARENCY REPORT 2017

CCOO, FP





An investor initiative in partnership with UNEP Finance Initiative and UN Global Compact

About this report

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

This report is an export of the individual Signatory organisation's response to the PRI during the 2016 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. 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 shows how these relate to the six <u>Principles for Responsible Investment</u>. 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
Ø	The signatory has completed some parts of this indicator
6	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator
Ю	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.

1



Principles Index

Organisa	Organisational Overview								Principle			
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6			
OO 01	Signatory category and services	1	Public							✓		
OO 02	Headquarters and operational countries	1	Public							✓		
OO 03	Subsidiaries that are separate PRI signatories	~	Public							✓		
OO 04	Reporting year and AUM	1	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	1	Public							✓		
OO 07	Fixed income AUM breakdown	1	Public							✓		
OO 08	Segregated mandates or pooled funds	1	Public							✓		
OO 09	Breakdown of AUM by market	1	Private							✓		
OO 10	RI activities for listed equities	1	Public							✓		
00 11	RI activities in other asset classes	1	Public							✓		
00 12	Modules and sections required to complete	1	Public							✓		
OO End	Module confirmation page	1	-									



Strategy	Strategy and Governance							Principle				
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	1	Public							✓		
SG 04		1	Public							✓		
SG 05	RI goals and objectives	✓	Public							✓		
SG 06	Main goals/objectives this year	1	Public							✓		
SG 07	RI roles and responsibilities	✓	Public							✓		
SG 08	RI in performance management, reward and/or personal development	~	Private							\checkmark		
SG 09	Collaborative organisations / initiatives	✓	Public				✓	✓				
SG 10	Promoting RI independently	1	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	~	Private	~								
SG 14	Allocation of assets to environmental and social themed areas	✓	Private	~								
SG 15	ESG issues for internally managed assets not reported in framework	₿	n/a							~		
SG 16	ESG issues for externally managed assets not reported in framework	✓	Public							\checkmark		
SG 17	Innovative features of approach to RI	1	Private							✓		
SG End	Module confirmation page	✓	-									



Indirect -	Indirect – Manager Selection, Appointment and Monitoring							le		General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SAM 01	Role of investment consultants/fiduciary managers	4	Public				~			
SAM 02	RI factors in selection, appointment and monitoring across asset classes	✓	Public	~						
SAM 03	Breakdown by passive, quantitative, fundamental and other active strategies		Private							✓
SAM 04	ESG incorporation strategies	✓	Public	✓	✓					
SAM 05	Selection processes (LE and FI)	1	Public	 ✓ 						
SAM 06	Evaluating engagement and voting practices in manager selection (listed equity/fixed income)	~	Public		~					
SAM 07.1	Appointment processes (listed equity/fixed income)	₿	n/a	~						
SAM 07.2-5	Appointment processes (listed equity/fixed income)	₿	n/a	~						
SAM 08	Monitoring processes (listed equity/fixed income)	1	Public	~						
SAM 09	Monitoring on active ownership (listed equity/fixed income)	•	Public	~						
SAM 10	Percentage of (proxy) votes	₿	n/a		✓					
SAM 11	Percentage of externally managed assets managed by PRI signatories	1	Private	~						
SAM 12	Examples of ESG issues in selection, appointment and monitoring processes	✓	Public	~					~	
SAM 13	Disclosure of RI considerations	1	Public						 ✓ 	
SAM End	Module confirmation page	✓	-							



Direct -	Listed Equity Active Ownership				Principle			General		
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEA 01	Description of approach to engagement	✓	Public		✓					
EA 02	Reasoning for interaction on ESG issues	1	Public	 ✓ 	~	~				
LEA 03	Process for identifying and prioritising engagement activities	~	Public		~					
EA 04	Objectives for engagement activities	✓	Public		~					
EA 05	Process for identifying and prioritising collaborative engagement	✓	Public		~					
EA 06	Objectives for engagement activities	✓	Public		~					
EA 07	Role in engagement process	1	Public		~		✓			
EA 08	Monitor / discuss service provider information	~	Public		~				~	
EA 09	Share insights from engagements with internal/external managers	✓	Public	~	~					
EA 10	Tracking number of engagements	✓	Public		~					
EA 11	Number of companies engaged with, intensity of engagement and effort	~	Public		~					
.EA 12	Engagement methods	✓	Public		~					
EA 13	Engagements on E, S and/or G issues	₿	n/a		~					
EA 14	Companies changing practices / behaviour following engagement	~	Public		~					
EA 15	Examples of ESG engagements	1	Public		~					
.EA 16	Disclosure of approach to ESG engagements	~	Public		~				~	
EA 17	Voting policy & approach	✓	Public	✓	~	✓				
EA 18	Typical approach to (proxy) voting decisions	~	Public		~					
.EA 19	Percentage of voting recommendations reviewed	8	n/a		~					
.EA 20	Confirmation of votes	1	Public		✓					
EA 21	Securities lending programme	✓	Private		✓					
EA 22	Informing companies of the rationale of abstaining/voting against management	1	Public		~					
EA 23	Percentage of (proxy) votes cast	✓	Public		~					
EA 24	Proportion of ballot items that were for/against/abstentions	1	Public		~					
EA 25	Shareholder resolutions	✓	Public		~					
EA 26	Examples of (proxy) voting activities	1	Public		~					
EA 27	Disclosing voting activities	1	Public		~				~	
EA End	Module confirmation page	✓	-							



CCOO, FP

Reported Information

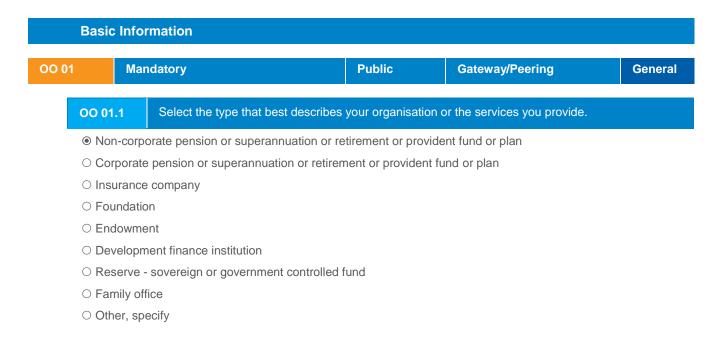
Public version

Organisational Overview

PRI disclaimer

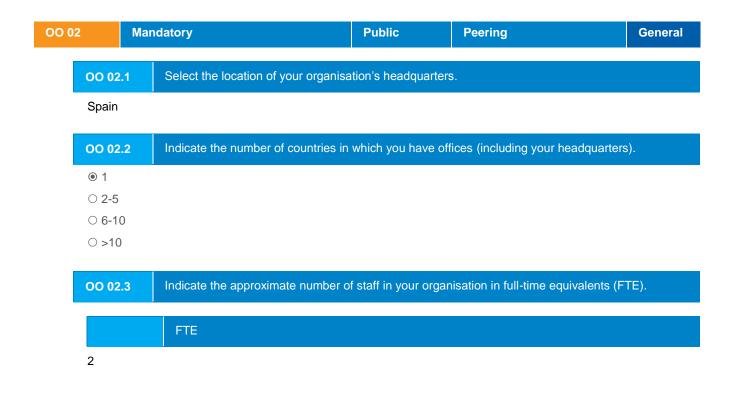
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OO 01.2 Additional information. [Optional]

CCOO, FP is a pension fund for members of the trade union CCOO.







2 people attend the requests of the members of the trade union, who are members of the pension fund or would like to become members of the pension fund (primarily administrative and information issues).

00 0	3	Man	datory			Public		Descriptive			General
	OO 03	.1	Indicate whether y their own right.	vou have su	ıbsidiarie	es within yo	ur organ	nisation that	are also F	PRI signat	ories in
	⊖ Yes ● No										
00 0	4	Man	datory			Public		Gateway/Pe	ering		General
	00 04	.1	Indicate the year e	end date for	· your re	porting yea	r.				
I	31/12/	2016									
	OO 04.2 Indicate your total AUM at the end of the report on.				e end of	your report	ing year	, excluding s	subsidiarie	es you ha	ve chosen
				trillions	billions	millions	thousa	nds hundr	eds		
			Total AUM			11	579	112			
			Currency	EUR							
			Assets in USD			12	392	006			
00 0	6	Man	datory			Public		Descriptive			General

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

-		06	
	JU		
	~		

.1

How you would like to disclose your asset class mix.

as percentage breakdown

	Internally managed (%)	Externally managed (%)
Listed equity	0	25.75
Fixed income	0	64.3
Private equity	0	0.05
Property	0	1.29



Infrastructure	0	0
Commodities	0	0
Hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Other (1), specify	0	8.56
Other (2), specify	0	0

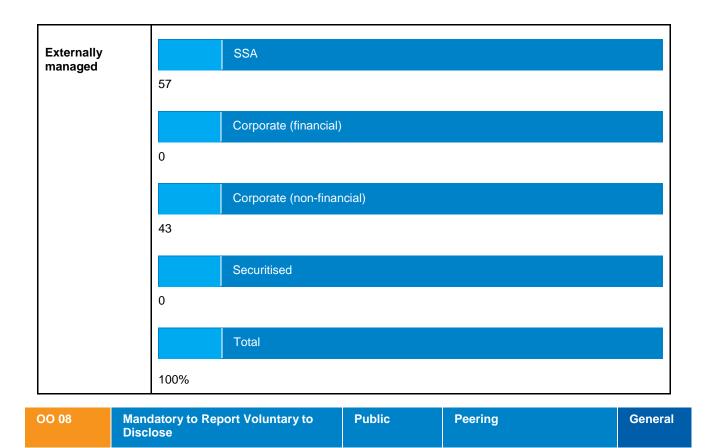
'Other (1)' specified

Current account.

 \odot as broad ranges

	00 06	.2	Publish our asset class mix as per	attached image		
000)7		ndatory to Report Voluntary to close	Public	Gateway	General
	00 07	.1	Provide to the nearest 5% the perc reporting year, using the following	<u> </u>	own of your Fixed Income A	UM at the end of your





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

OO 08.1Provide a breakdown of your organisation's externally managed assets between segregated
mandates and pooled funds.



Asset class breakdown	Segregated mandate(s)	Pooled fund(s)
[a] Listed equity	0 0%	0 0%
	● <10%	○ <10%
	○ 10-50%	● 10-50%
	○ >50 %	○ >50 %
[b] Fixed income - SSA	0%	● 0%
	○ <10%	○ <10%
	● 10-50%	○ 10-50%
	○ >50 %	○ >50 %
[c] Fixed income – Corporate (financial)	● 0%	● 0%
	○ <10%	○ <10%
	○ 10-50%	○ 10-50%
	○ >50 %	○ >50 %
[d] Fixed income – Corporate (non-financial)	● 0%	0 %
	○ <10%	○ <10%
	○ 10-50%	10-50%
	○ >50 %	○ >50 %
[e] Fixed income – Securitised	● 0%	● 0%
	○ <10%	○ <10%
	○ 10-50%	○ 10-50%
	○ >50 %	○ >50 %
[f] Private equity		0 %
	○ <10%	● <10%
	○ 10-50%	○ 10-50%
	○ >50 %	○ >50 %
[g] Property	• 0%	0 %
	○ <10%	© <10%
	○ 10-50%	○ 10-50%
	○ >50 %	○ >50 %
[o] Other (1), specify	0%	● 0%
··· · ·	○ 0%◎ <10%	© 0 % ○ <10%
	○ 10-50% ○ >50 %	○ 10-50% ○ >50 %
Total externally managed assets		
	Please ensure the entire table (both columns combined)	



	totals to 100%	

OO 08.2 Additional information. [Optional]

Our investment in corporate debt is mainly through investment funds. The majority of assets are of non-financial corporates, but there can also be assets of financial corporates.

Gateway asset class implementation indicators 00 10 Mandatory Public Gateway General Select the direct or indirect ESG incorporation activities your organisation implemented for listed 00 10.1 equities in the reporting year. I We address ESG incorporation in our external manager selection, appointment and/or monitoring processes □ We do not incorporate ESG in our directly managed listed equity and/or we do not address ESG incorporation in our external manager selection, appointment and/or monitoring processes. Select the direct or indirect engagement activities your organisation implemented for listed equity in 00 10.2 the reporting year. I We engage with companies on ESG factors via our staff, collaborations or service providers U We require our external managers to engage with companies on ESG issues on our behalf □ We do not engage directly and do not require external managers to engage with companies on ESG factors. Select the direct or indirect voting activities your organisation implemented for listed equity in the 00 10.3 reporting year We cast our (proxy) votes directly or via dedicated voting providers □ We require our external managers to vote on our behalf □ We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf 0011 Public Mandatory Gateway General Select the externally managed assets classes where you addressed ESG incorporation and/or 00 11.2 active ownership in your external manager selection, appointment and/or monitoring processes (during the reporting year) ☑ Fixed income – SSA ☑ Fixed income – corporate (non-financial) ☑ Private equity ☑ Property ☑ Other (1) □ None of the above

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

Current account.



12 M	andatory	Public	Gateway	General
You will nee report on.	ed to make a selection in OO 12.1or	nlyif you have a	iny voluntary modules tha	t you can choose to
00 12.1	Select from below any additional voluntarily. You are only required AUM.			
	Core modules			
⊡ Orga	nisational Overview			
☑ Strat	egy and Governance			
	RI implementation directly or vi	a service provic	ore	
	RT implementation directly of vi	a service provid	615	
	Direct - Listed Equity active of	ownership		
⊠ Er	gagements			
☑ (P	roxy) voting			
	RI implementation via external	managers		
	Indirect - Selection, Appointn	nent and Monito	ring of External Managers	
	sted Equities			
	ked income - SSA			
☑ Fix	ked income - Corporate (non-financial)		
🗆 Pr	ivate Equity			
⊠ Pr	operty			
	Closing module			
⊠ Closi	ng module			
00 12.2	Additional information. [Optional]			

Sheltered housing for rent, mainly for people below 35 years old.



CCOO, FP

Reported Information

Public version

Strategy and Governance

PRI disclaimer

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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
☑ Policy setting out your overall approach	Applicable policies cover all AUM
□ Formalised guidelines on environmental factors	\bigcirc Applicable policies cover a majority of AUM
□ Formalised guidelines on social factors	\bigcirc Applicable policies cover a minority of AUM
$\hfill\square$ Formalised guidelines on corporate governance factors	
□ Asset class-specific RI guidelines	
□ Sector specific RI guidelines	
☑ Screening / exclusions policy	
☑ Engagement policy	
☑ (Proxy) voting policy	
□ Other, specify (1)	
\Box Other, specify(2)	

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

I Your organisation's definition of ESG and/or responsible investment and it's relation to investments

- ☑ Your investment objectives that take ESG factors/real economy influence into account
- Processes / approaches to incorporating ESG
- ☑ Time horizon of your investment
- $\hfill\square$ Governance structure of organisational ESG responsibilities
- \Box ESG incorporation approaches
- ☑ Active ownership approaches
- ☑ Reporting
- □ Other RI considerations, specify (1)
- □ Other RI considerations, specify (2)



SG 01.4 Indicate what norms you have used to develop your investment policy that covers your responsible investment approach.

- ☑ UN Global Compact Principles
- I 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 (1) description

Corporate Governance Code of the Spanish Supervisor of Financial Markets.

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

SG 01.5 Describe your organisation's investment principles, and overall investment strategy, and how they consider ESG factors and real economy impact.

Our investments beliefs: we consider that the long term horizon is totally linked to the sustainability of our investments. We think that we must exercise our social responsability with the members and beneficiaries of our pension fund and with the society as a whole. We are also active investors and participate in the Shareholder General Meetings of the Spanish companies in our portfolio.

We include our beliefs in our investment strategy through the the consideration and the measure of extrafinancial risks. We think that the inclusion of the ASG criteria in our investment decisions help us to avoid risks and also find opportunities of investment.

We think that the inclusion of those items in our strategy has a positive impact on the value of our portfolio.

 \bigcirc No

SG 01.6

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

We have included references to social responsible investment in all the different sections of our investment policy (objectives: our beliefs mentioned above; asset allocation: where we mention the norms considered in our policy and that the analysis should cover, whenever it is possible, all the assets of the portfolio; measurement of risks: consideration of extra-financial risks: the asset manager should inform of all the external and internal resources used in order to implement the SRI policy, the percentage of assets that have been covered with an SRI analysis, also in disaggregated terms -of each asset class-). The asset manager must also inform on the participation in the Shareholders General Meetings, in case that the supervisory board of the pension fund delegates the political rights to the asset manager.

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





☑ Policy setting out your overall approach



http://www.ccoo.es/cms/g/public/o/0/o24074.pdf

□ Attachment (will be made public)

Screening / exclusions policy



http://www.ccoo.es/cms/g/public/o/0/o24074.pdf

URL

□ Attachment (will be made public)

☑ Engagement policy



URL

http://www.ccoo.es/cms/g/public/o/0/o24074.pdf

□ Attachment (will be made public)

☑ (Proxy) voting policy

URL/Attachment

☑ URL



□ Attachment (will be made public)

 $\hfill\square$ We do not publicly disclose our investment policy documents



SG 02.2 Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.

If Your organisation's definition of ESG and/or responsible investment and it's relation to investments

URL/Attachment

🗹 URL

URL

http://www.ccoo.es/cms/g/public/o/0/o24074.pdf

□ Attachment

I Your investment objectives that take ESG factors/real economy influence into account

	URL/Attachment
☑ URL	

URL

http://www.ccoo.es/cms/g/public/o/0/o24074.pdf

□ Attachment

Processes / approaches to incorporating ESG

	URL/Attachment
⊠ URL	

URL

http://www.ccoo.es/cms/g/public/o/0/o24074.pdf

□ Attachment

☑ Time horizon of your investment

URL/Attachment

☑ URL



http://www.ccoo.es/cms/g/public/o/0/o24074.pdf

Attachment

☑ Active ownership approaches



	URL/Attachment	
⊠ URL		
	URL	
http://ww	vw.ccoo.es/cms/g/public/o/0/o24074.pdf	

□ Attachment

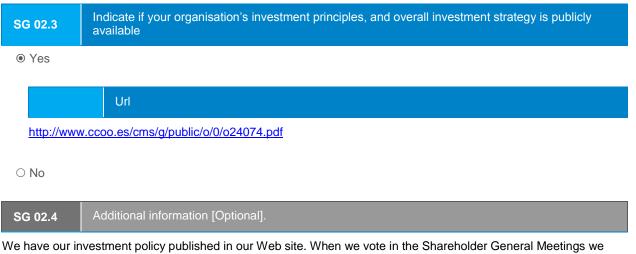
☑ Reporting

	URL/Attachment
⊠ URL	
	URL

http://www.ccoo.es/cms/g/public/o/0/o24074.pdf

□ Attachment

 $\hfill\square$ We do not publicly disclose any investment policy components



We have our investment policy published in our Web site. When we vote in the Shareholder General Meetings we followed the recommendations of CCOO that are also published in our Website (we vote in all Spanish companies). We inform twice a year to our pension fund members of financial and extra-financial issues, including all the developments of our SRI policy (specially our participation in collaborative engagement campaigns). Once a year, we report on the votes cast in the Spanish Shareholder General Meetings.



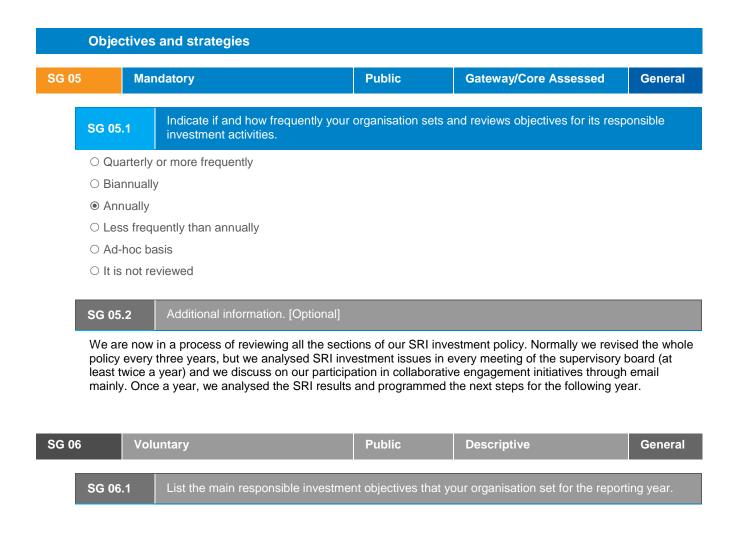


SG 03.3 Additional information. [Optional]

We will analyse possible conflicts of interest that may arise and we will consider developing a policy in the next years.



ASG valuation of the company presents some extra-financial risks, the investment of the company will be reduced (underweight of the investment) and the exposure to the sector or index will be covered through an ETF in order the hold the expected exposure to the index or sector.



RI Principles for Responsible Investment



Responsible investment processes

- □ Provide training on ESG incorporation
- □ Provide training on ESG engagement
- Improved communication of ESG activities within the organisation

Key performance indicator

We have sent two letters to our pension fund members in order to inform them on financial and extrafinancial issues.

Progress achieved

We have reported of our participation in two collaborative engagement initiatives (one with the PRI -ESG criteria in rating companies- and the other with the Committee on Workers Capital (CWC) -in order to elevate the social issues in the PRI-). We are now planning to send an specific report once a year exclusively on SRI and voting issues based on our annual report on the SRI issues that we include in our annual accounts.

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

Key performance indicator

We try to participate in engagement initiatives of the PRI and CWC that are aligned with the interest of our participants and beneficiaries.

Progress achieved

We have participated in two initiatives in 2016 (see above).

Improved ESG incorporation into investment decision making processes

Key performance indicator

We have revised our SRI policy in 2016. We will implement changes of the whole policy in 2017.

Progress achieved

We have discuss on changes on the SRI policy and we will approve them in April 2017 when we approve the annual accounts.

- □ Other, specify (1)
- □ Other, specify (2)
- \Box Other, specify (3)

Financial performance of investments

☑ Increase portfolio performance by consideration of ESG factors

1.4				
KOV	nortorr	nance	indic	nator
IVEN	perforr	nance	IIIUIU	alur

The asset manager considers ESG criteria in all assets in which they invest. We will try to include more indicators in the next years.

Progress achieved

The asset manager has considered ESG criteria in 100% of assets. We will try to influence in their analysis and indicators in the next years in order to improve the SRI results of our pension fund.

- \Box Other, specify (1)
- \Box Other, specify (2)
- \Box Other, specify (3)

ESG characteristics of investments

Over or underweight companies based on ESG characteristics

Key performance indicator

The asset manager underweights companies that have ESG risks and maintains the same exposure to the sector or index with an ETF.

Progress achieved

In 2016, the asset manager has implemented this policy whenever they have found extra-financial risks.

☑ Improve ESG ratings of portfolio

Key performance indicator

Actuarial and financial review. Coverage of portfolio: 52%. Tool used by the consultancy company: Sustainalytics.

Progress achieved

Rating ASG: 72 (as the average of the universe of Sustainalytics). Rating Corporate Governance: 77 (above average of the universe of Sustainalytics). Rating Social: 84 (above average of the universe of Sustainalytics). Environmental rating: 57 (below average of the universe of Sustainalytics).

□ Setting carbon reduction targets for portfolio

- \Box Other, specify (1)
- \Box Other, specify (2)
- \Box Other, specify (3)

Other activities

☑ Joining and/or participation in RI initiatives



In two collaborative engagement initiatives (see above).

Progress achieved

We participate in the two initiatives mentioned above. The initiatives began last year. We follow the reports of the leaders of the initiatives. In both initiatives there has been some improvements, though both of them are in an early state.

I Encouraging others to join a RI initiative

Key performance indicator

The promoter, CCOO, promotes among the occupational pension funds, the participation in the initiatives mentioned above.

Progress achieved

An occupational pension fund decided to participate in the CWC Initiative.

- □ Documentation of best practice case studies
- □ Using case studies to demonstrate engagement and ESG incorporation to clients
- □ Other, specify (1)
- \Box Other, specify (2)
- \Box Other, specify (3)

Governance and human resources						
SG ()7	Mar	ndatory	Public	Core Assessed	General
	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.				ve oversight	





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
- □ Other Chief-level staff or head of department, specify
- □ Portfolio managers
- □ Investment analysts
- □ Dedicated responsible investment staff
- I 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
- \Box Other role, specify (1)
- □ Other role, specify (2)



The supervisory board exercises the voting rights in the Spanish Shareholder Meetings. Also debates and decides the participation of the pension fund in the SRI Initiatives (CWC, PRI) and analyses the results of the SRI investment in order to decide if it is needed to implement changes to strengthen the policy.



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]

We have signed the ESG Initiative on Rating Companies of PRI. We are not leaders of the initiative, though we follow the reports of the leaders and will participate when it is required.

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

Committee on Workers' Capital (CWC), network supporter of the initiative PRI.

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

- Basic
- \Box Moderate
- ☑ Advanced

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

The promoter of the pension fund, CCOO participates very actively in all the initiatives of the CWC. In 2016, one of the most important initiatives was "Elevating the S in the PRI". CCOO FP participated in the initiative.

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

0	Man	datory	Public	Core Assessed	PRI 4
SG 1).1	Indicate if your organisation promo initiatives.	tes responsible inve	estment, independently of colla	borative
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				
	□ Pro	ovided financial support for academ	ic or industry resea	rch on responsible investment	
Image 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					
	⊠ Wı	ote articles on responsible investme	nt in the media.		
	□ Ot	her, specify			
○ No					
SG 10).3	Describe any additional actions an reporting year to promote responsi			during the

actively. CCOO also elaborates proxy voting recommendations that are published in the Website of CCOO and send them to all CCOO members in the supervisory boards of the occupational pension funds in Spain. CCOO also organizes an Annual Event for the members of CCOO in the supervisory boards of the occupational pension funds. This event always includes a panel dedicated to SRI (PRI, proxy voting, campaigns, etc.). We also have courses and material, which included financial and extra-financial issues.

SG	3 11	Voluntary	Public	Additional Assessed	PRI 4,5,6



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

I 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

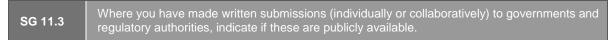
Drafted your own written submissions to governments, regulators or public-policy markers

I Participated in face-to-face meetings with government members or officials to discuss policy

☑ Other, specify

specify description

CCOO, the promoter, participated in a working group in SpainSIF to improve the SRI information included by the occupational pension funds in the annual report.



• Yes, publicly available

provide URL

http://www.spainsif.es/plan-de-educacion-financiera/

 \odot No

 \bigcirc No

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

The standardisation of the information on SRI issues for the occupational pension funds in Spain. CCOO, the promoter of the pension fund CCOO FP, participated actively in the elaboration of that document.

Implementation not in other modules						
SG 12	Mandatory	Public	Descriptive	PRI 1		

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



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

 \Box We execute scenario analysis which includes factors representing the investment impacts of future environmental trends

 \Box We execute scenario analysis which includes factors representing the investment impacts of future social trends

 \Box We execute scenario analysis which includes factors representing the investment impacts of future governance trends

 \Box We execute other scenario analysis, specify

If We do not execute such scenario analysis and/or modelling

SG 12.2 Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.

• We do the following

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

The asset manager implements a due diligence process, which includes ESG issues, when they invest in investment funds or in alternative investment.

O We do not consider ESG issues in strategic asset allocation

SG 12.3 Additional information. [OPTIONAL]

The asset manager has integrated ESG criteria in their analysis of the portfolio. In the next years, we will try to develop with them more indicators in order to improve and strengthen the SRI policy.

SG 16	Mandato	ry	Public Descriptive Gener					
SG 16.1 Describe how you address ESG issues for externally managed assets for which a specific PR asset class module has yet to be developed or for which you are not required to report becaus your assets are below the minimum threshold.								
Asset Class Private equity		The supervisory board must a private equity. We analyse th issues considered and also the second sec	authorise the inves e prior behaviour o ne ESG issues incl	e outputs or outcomes achieve tment in all alternative assets, inc of the asset manager in terms of E uded in the proposal of investmer al decision (of invest or not in the	luding SG nt. We			
Other (1) [a Organisatio Overview m	nal	The current account is alloca	ted in our deposita	ry entity, BBVA.				



CCOO, FP

Reported Information

Public version

Indirect – Manager Selection, Appointment and Monitoring

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.





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

SAM 01.1	Indicate whether your organisation uses investment consultants and/or fiduciary managers.

□ Yes, we use investment consultants

☑ Yes, we use a fiduciary manager that delegates management of some or all of our assets to third-party managers.

SAM 01.4	Indicate if your organisation considers responsible investment in the monitoring processes for fiduciary managers.
● Responsi	ble investment is considered when monitoring our fiduciary manager
SAM 0	1.5 Indicate whether your organisation considers any of the following responsible investment factors in the monitoring of fiduciary managers
⊠ Inclu	iding responsible investment as a standard agenda item at performance review meetings
	ussing whether the manager has acted in accordance with your overall investment beliefs on sible investment and ESG factors
	cussing whether the manager has acted in accordance with your organisation's overall strategy consible investment and ESG factors
	cussing whether the manager has acted in accordance with your organisation's overall policy on sible investment and ESG factors
□ Rev	iewing the manager's PRI Transparency or Assessment reports
⊠ Rev	iewing the manager's responsible investment reporting (excluding PRI generated reports)
⊠ Rev	iewing ESG characteristics of the portfolio
□ Rev	iewing the impact of ESG factors on financial performance
	ouraging your managers to consider joining responsible investment initiatives/organisations or bate in collaborative projects with other investors
□ Inclu evalua	iding responsible investment criteria as a formal component of overall manager performance tion
□ Othe	er general aspects of your monitoring; specify
SAM 0	1.6 Describe the approach you take to monitoring your fiduciary managers and the reason(s) for this approach [Optional].
This year	, we will analyse the PRI report of our asset manager.

O We do not consider responsible investment in the monitoring processes for fiduciary managers

 $\hfill\square$ No, we do not use investment consultants or fiduciary managers.

SAM 02 Mandatory Public Gateway PR	RI 1
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SAM 02.1

Indicate for which of the following externally managed asset classes your organisation, and/or your investment consultants, consider responsible investment factors in investment manager: (a) Selection, (b) Appointment (investment management agreements/contracts), and (c) Monitoring

Select all that apply

Asset classes	(a) Selection	(b) Appointment	(c) Monitoring
Listed equity			\checkmark
Fixed income - SSA			
Fixed income - Corporate (non-financial)			
Property			

SAM 02.2

Provide a brief description of how your organisation includes responsible investment considerations in your investment manager selection, appointment and monitoring processes.

The most developed SRI process is in listed equity (direct investment), where there is a permanent evaluation of most companies in all monthly reports. If extra-financial risks arise, there is an underweight of the investment in that company and the exposure to the sector/index maintains the same weight through the buy of an ETF.

Government fixed income is mainly invested in European Administrations (more than 30% of assets under management), which comply with the SRI policy. There is a due diligence process, which considers SRI criteria, in the selection of investment funds, though we have to develop more the monitoring of the SRI indicators of the investment in those funds (fixed income and listed equity funds).

Listed Equity and Fixed Income Strategies SAM 04 Mandatory Public Gateway PRI 1,2 SAM 04.1 Indicate which of the following ESG incorporation strategies you require your external manager(s) to implement on your behalf: Active investment strategies



Active investment strategies	Listed Equity	FI - SSA	FI - Corporate (non-financial)	
Screening				
Thematic				
Integration	\checkmark	\checkmark	V	
None of the above				

Passive investment strategies

Passive investment strategies	Listed Equity	FI - SSA	FI -Corporate (non-financial)	
Screening				
Thematic				
Integration	\checkmark		V	
None of the above				

SAM 04.2

Explain how you integrate ESG factors in the selection, appointment and monitoring of your passive funds

Passive investment is mainly through derivatives or ETFs. There can be many reasons for passive investment: to protect the pension fund of possible losses, to access to concrete financial markets and to implement the SRI policy through the underweight of companies with extrafinancial risks and maintain the same weight of the sector or index.

Selection							
SAM	05	Mar	ndatory	Public	Core Assessed	PRI 1	
	SAM 0)5.1	Indicate what RI-related information documentation for your external ma		typically covers in the majority of	selection	



	LE	FI - SSA	FI - Corporate (non- financial)		
Investment strategy and how ESG objectives relate to it					
ESG incorporation requirements					
ESG reporting requirements					
Other	\checkmark	\checkmark	V		
No RI information covered in the RFPs					

If you select any 'Other' option(s), specify

We only have one external asset manager. The supervisory board of the pension fund defines and monitors the investment policy, which will be implemented by the asset manager. The asset manager invests directly in equities and fixed income and in investment funds of equities and fixed income. In the direct investment, the SRI analysis is done by the asset manager and its internal and external resources (staff and ESG rating agencies). By the indirect investment, there is a due diligence process done by the asset manager, which includes a SRI questionnaire and meetings with the asset managers of the funds selected.

SAM 05.2

Explain how your organisation evaluates the investment manager's ability to align between your investment strategy and their investment approach

Strategy

	LE	FI - SSA	FI - Corporate (non-financial)
Assess the time horizon of the investment manager's investment strategy			
Assess the quality of investment policy and its reference to ESG			
Assess the investment approach and how ESG objectives are implemented in the investment process (asset class specific)			
Assess the ESG definitions to be used			
Other	\checkmark	\checkmark	
None of the above			



ESG people/oversight

	LE	FI - SSA	FI - Corporate (non- financial)	
Assess ESG expertise of investment teams				
Review the ownership of the ESG implementation				
Review how is ESG implementation enforced /ensured				
Other	\checkmark	V		
None of the above				

Process/portfolio construction/investment valuation



	LE	FI - SSA	FI - Corporate (non-financial)
Review the process ensuring the quality of the ESG data used			
Review and agree the investment decision making process (and ESG data use in it)			
Review and agree the ESG incorporation strategy impact of ESG analysis on investment decisions			
Review and agree how the manager is targeting returns and ESG objectives			
Review and agree how the manager identifies, measures and manages ESG risk			
Review and agree return and risk in combination at a portfolio level (portfolio construction) and ESG objectives			
Review how ESG materiality is evaluated by the manager in the monitored period			
Review process for defining and communicating on ESG incidents			
Other, specify	\checkmark	\checkmark	
None of the above			

If you select any 'Other' option(s), specify

As was described above, the supervisory board is responsible for elaborating the investment policy and monitor its implementation by the asset manager. The supervisory board has defined the investment policy and analyzes if the asset manager implements it. The asset manager is also responsible for selecting other asset managers. We have knowledge of the SRI questionnaire sent to other asset managers and the process of selection of other asset managers, which includes meetings with them and demands of information. Nevertheless, we have to develop more relevant indicators in order to better evaluate the indirect investment done by the asset manager.



SAM 05.3 Describe the selection process

□ Review responses to RfP, Rfl, DDQ etc.

□ Review Limited Partners' Responsible Investment Due Diligence Questionnaire (PE DDQ)

□ Review publicly available information

- $\hfill\square$ Review assurance process
- □ Review PRI Transparency Reports
- $\hfill\square$ Request and discuss PRI Assessment Reports
- $\hfill\square$ Meetings with the potential shortlisted managers
- □ Site visits to potential managers offices
- ☑ Other, specify

See response above.

SAM 05.4 When selecting external managers does your organisation set any of the following:

	LE	FI - SSA	FI - Corporate (non-financial)		
ESG score					
ESG weight					
Real world economy targets					
Other RI considerations	\checkmark		V		
None of the above					

If you select any 'Other' option(s), specify

See response above.



	FI - SSA	FI - Corporate (non- financial)	
Review the manager's engagement policy			
Review the manager's engagement process (with examples and outcomes)			
Ensure that engagement outcomes feed back into the investment decision-making process			
Other engagement issues in your selection process specify	\checkmark		
None of the above			

If you select any 'Other' option(s), specify

The supervisory board of the pension funds decides to participate or not in engagement initiatives. In 2016, we have participated in 2 initiatives. That was decided by the supervisory board, not by the asset manager.

SAM 06.2

2 Describe how you assess if the manager's engagement approach is effective.

□ Impact on investment decisions

 $\hfill\square$ Impact on company / asset level

- □ Impact on ESG profile or the portfolio
- $\hfill\square$ Evidence of changes in corporate practices
- ☑ Other, specify

The supervisory boards decides and implements the engagement policy. The supervisory board is also responsible for evaluating the process. We follow the process because we receive directly the information of the leaders of the initiatives in which we participate.

 $\hfill\square$ None of the above

Monitoring								
SAM	08	Man	datory	Public	Core Assessed	PRI 1		
	SAM 0	8.1	When monitoring managers, indicat information your organisation typica meetings/calls	te which of the follo ally reviews and eva	wing types of responsible inv aluates from the investment n	estment nanager in		



	LE	FI - SSA			
ESG objectives linked to investment strategy					
Investment restrictions and any controversial investment decisions					
ESG incorporation objectives (with examples)					
ESG portfolio characteristics					
How ESG materiality has been evaluated by the manager in the monitored period				T	
Information on any ESG incidents					
Metrics on the real economy influence of the investments					
PRI Transparency Reports					
PRI Assessment Reports					
Other general RI considerations in investment management agreements; specify	\checkmark				
None of the above					

f you select any 'Other' option(s), specify

We analyzed if the asset manager has comply with the investment policy of the pension fund that was defined by the supervisory board. We receive relevant information every month. And every year we review the overall policy. There is also an actuarial and financial review every three years, which includes extra financial issues done by a third party. The last review was in 2016. In extra financial issues we were above the average in corporate governance and social issues and below the average in environmental issues. We have to improve in that area.

<u> </u>	A N A	00	
- 3	AN 177	08	. 2

When monitoring external managers, does your organisation set any of the following to measure compliance/progress



	LE	FI - SSA			
ESG score					
ESG weight					
Real world economy targets					
Other RI considerations					
None of the above					

SAM 09	9 Mandatory		Public	Additional Assessed	PRI 1	

SAM 09.1

When monitoring managers, indicate which of the following active ownership information your organisation typically reviews and evaluates from the investment manager in meetings/calls

Engagement

	FI - SSA		
Report on engagements undertaken (outcomes and examples)			
Account on engagement ESG impacts			
Other RI considerations relating to engagement in investment management agreements; specify			
None of the above			

f you select any 'Other' option(s), specify

The supervisory board of the pension fund decides and implements the engagement policy, not the asset manager.

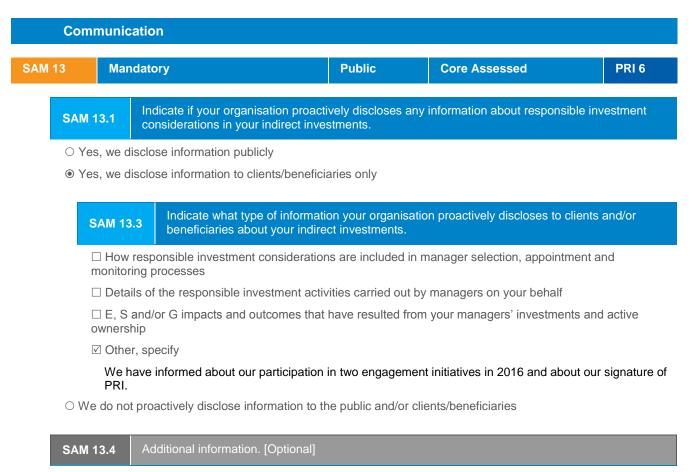
Outputs and outcomes SAM 12 Mandatory Public Additional Assessed PRI 1,6



SAM 12.1 Provide examples of how ESG issues have been addressed in the manager selection and/or monitoring process for your organisation during the reporting year.								
□ Add Exam	nple 1							
🗆 Add Exam	nple 2							
🗆 Add Exam	nple 3							
□ Add Example 4								
□ Add Example 5								
☑ We are not able to provide examples								

SAM 12.2 Additional information.

This function is delegated to our asset manager, which includes SRI criteria in its selection of other asset managers. We have knowledge of the questionnaire sent to the asset managers of the pension funds selected and of the process of selection, which includes meetings with the asset managers and demands of information.



We will send specific SRI information based on our SRI report included in the annual accounts. We also would like to publish it in the Website of the promoter of the pension fund (CCOO).



CCOO, FP

Reported Information

Public version

Direct - Listed Equity Active Ownership

PRI disclaimer

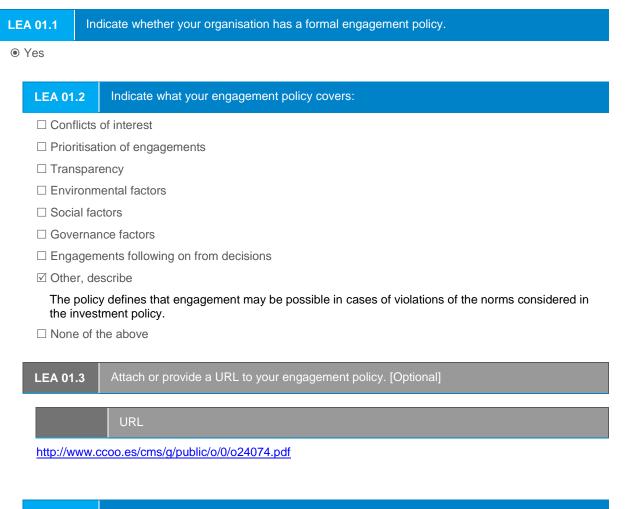
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Engagement

Overview Core Assessed LEA 01 Mandatory **Public** PRI 2

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



LEA 01.4 Provide a brief overview of your organization's approach to engagement

The supervisory board of the pension fund decides whether to participate or not in a process of engagement. There are two possibilities. The first one would be in cases of violations of the norms considered in the policy by a company included in our portfolio. The second case would be to participate in the campaigns proposed by the Networks in which we participate (PRI, CWC).

 \bigcirc No

LEA 02	Mandatory	Public	Gateway	PRI 1,2,3



LEA 02.1

Indicate the method of engagement, giving reasons for the interaction.

Type of engagement	Reason for interaction
Individual/Internal staff	$\ensuremath{\boxdot}$ To influence corporate practice (or identify the need to influence) on ESG issues
engagements	☑ To encourage improved/increased ESG disclosure
	□ Other, specify
	\Box We do not engage via internal staff
Collaborative engagements	$\ensuremath{\boxdot}$ To influence corporate practice (or identify the need to influence) on ESG issues
	☑ To encourage improved/inreased ESG disclosure
	□ Other, specify
	\Box We do not engage via collaborative engagements
Service provider engagements	$\ensuremath{\boxdot}$ To influence corporate practice (or identify the need to influence) on ESG issues
	☑ To encourage improved/increased ESG disclosure
	□ Other, specify
	□ We do not engage via service providers

LEA 02.2

Additional information. [Optional]

Due to the small size of our fund, we prefer to participate in collaborative engagements, though it would be possible to make individual interaction (for instance with our asset manager). In 2016, we participate in two collaborative engagements.

Process

Pro	ocess for en	gagements run internally			
LEA 03	Mandato	pry	Public	Core Assessed	PRI 2
	New selectior carefully.	n options have been added to t	his indicator. Plea	ise review your prefilled respor	ISES
	LEA 03.1	Indicate whether your organisa engagement activities carried o		process for identifying and prioritis	sing
	⊖ Yes				
	No				



Due to our small size, we prefer to participate in collaborative engagement. In the next years, we will consider to develop a formal process.

LEA 04	Mandatory	Public	Core Assessed	PRI 2

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

LEA 04.1	Indicate if you define specific objectives for your engagement activities.
\odot Yes	
● We do	not define specific objectives for engagement activities carried out by internal staff.

LEA 04.2 Indicate if you monitor the actions that companies take following your engagements. O Yes

 ${\ensuremath{\, \odot}}$ We do not monitor the actions that companies take following engagement activities carried out by internal staff.

LEA 04.3	Indicate whether your organisation defines milestones and goals for engagement activities carried out by internal staff.
⊖ Yes	

No

LEA 04.5	Additional information. [Optional]	
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As was mentioned in the other indicators of this section, due to our small size, we focused our engagement policy on collaborative engagements.

Process for engagements conducted via collaborations

LEA 05 Mandatory	Public	Core Assessed	PRI 2
------------------	--------	---------------	-------

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

LEA 05.1 Indicate whether your organisation has a formal process for identifying and prioritising collaborative engagements
--

Yes



LEA 05.2 Describe the criteria used to identify and prioritise collaborative engagements

- \Box Potential to learn from other investors
- □ Ability to add value to the collaboration
- Geography / market of the companies targeted
- $\hfill\square$ Materiality of ESG factors
- □ Systemic risks to global portfolios
- □ Exposure (holdings)
- $\hfill\square$ In response to ESG impacts which has already taken place
- $\hfill\square$ In response to divestment pressure
- \Box Client requests
- ☑ Other, describe

other description

We participate very actively in the CWC. CCOO, the promoter of the fund, as a trade union, is very interested in improving the "S" indicators.

 \bigcirc No

LEA 05.3	Additional information [Optional]

In the next years, we will develop criteria in order to identify and prioritise collaborative engagements in the PRI.

LEA 06 Mandatory	Public	Core Assessed	PRI 2
------------------	--------	---------------	-------

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

LEA 06.1	Indicate if you define specific objectives for your engagement activities carried out collaboratively.
\bigcirc Yes	
@ Wa da	not define an existing the for an approximate activities corried out collaboratively

• We do not define specific objectives for engagement activities carried out collaboratively.

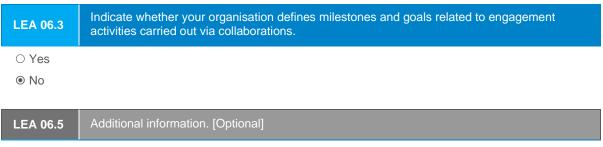
LEA 06.2 Indicate if you monitor the actions companies take following your collaborative engagements.

Yes

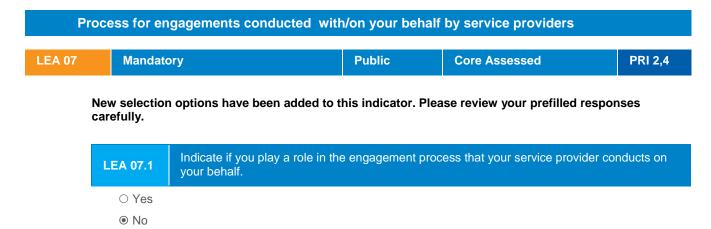
- Yes, in all cases
- \odot Yes, in the majority of cases
- \odot Yes, in the minority of cases

 \odot We do not monitor the actions that companies take following engagement activities carried out collaboratively





We monitor all the information that we received for the leaders of the initiatives in which we participate.



LEA 07.3	Additional information. [Optional]

We do not participate in engagement processes through service providers.

LEA 08	Mandato	ory	Public	Core Assessed	PRI 2,6	
	LEA 08.1	Indicate whether you monitor a service provider	and/or discuss the f	ollowing information provided to y	ou by your	
	Please select all that apply					
	🗆 The subje	ect (or ESG issue(s)) of engagem	ient			
	🗆 The object	ctives of the engagement				
	□ The ratio	nale for engagement				
	🗆 The frequ	ency/intensity of interactions with	n companies			
	 Progress towards achieving engagement goals Outcomes that have been achieved from the engagement 					
	Next step	s for engagement activity				
	☑ Other, sp	ecify				
	The engagement is decided directly by the supervisory board.					
	□ None of t	he above				
			47			



We discuss the three first items mentioned above (LEA 08.1).

Ge	General processes for all three groups of engagers					
LEA 09	Voluntary	y	Public	Additional As	sessed	PRI 1,2
	LEA 09.1	Indicate if insights gained from your engagements are shared with y investment managers.		your internal or	external	
		Type of engagement		Insights shared		
		Individual/Internal staff enga	gements	 Yes, systematically Yes, occasionally No 		
		Collaborative engagements		 Yes, systematically Yes, occasionally No 		
		Service provider engagemen	its	 Yes, systematically Yes, occasionally No 		
	LEA 09.2	Additional information. [Optiona	al]		J	

It depends on the initiative, but in many cases we have different views in terms of engagement.

LEA 10	Mandate	ory	Public	Gateway	PRI 2
	LEA 10.1	Indicate if you track the numbe	er of engagements	your organisation participates in.	



Type of engagement	Tracking engagements
Individual / Internal staff engagements	 Yes, we track the number of our engagements in full Yes, we partially track the number of our engagements We do not track
Collaborative engagements	 Yes, we track the number of our engagements in full Yes, we partially track the number of our engagements We do not track and cannot estimate our engagements
Service provider engagements	 Yes, we track the number of our engagements in full Yes, we partially track the number of our engagements We do not track and cannot estimate our engagements

LEA 10.2 Additional information. [OPTIONAL]

We track the number of engagements, though as we said in the other indicators, we only did collaborative engagements in 2016.

Outputs and outcomes LEA 11 Mandatory to Report Voluntary to Disclose Public Core Assessed PRI 2 LEA 11.1 Indicate the amount of your listed equities portfolio with which your organisation engaged during the reporting year. Indicate the amount of your listed equities portfolio with which your organisation engaged during the reporting year.



	Number of companies engaged (avoid double counting, see explanatory notes)	Proportion (to the nearest 5%)	Specify the basis on which this percentage is calculated
Individual / Internal staff engagements	Number of companies engaged 0	Proportion (to the nearest 5%) 0	Specify the basis on which this percentage is calculated • of the total number of companies you hold • of the total value of your listed equity holdings
Collaborative engagements	0	Proportion (to the nearest 5%) 0	Specify the basis on which this percentage is calculated • of the total number of companies you hold • of the total value of your listed equity holdings
Service provider engagements	0	Proportion (to the nearest 5%)	Specify the basis on which this percentage is calculated of the total number of companies you hold of the total value of your listed equity holdings

LEA 11.2

Indicate the proportion of engagements that involved multiple, substantive and detailed discussions or interactions with a company during the reporting year relating to ESG issue.



Type of engagement	% Comprehensive engagements
	○ > 50%
	○ 10-50%
la di sida al / la tama la ta tt angana ang sa sa sa sa	○ <10%
Individual / Internal staff engagements	● None
	○ >50%
	○ 10-50%
	○ <10%
Collaborative engagements	● None
	○ >50%
	○ 10-50%
	○ <10%
Service provider engagements	None

LEA 11.3

Indicate the percentage of your collaborative engagements for which you were a leading organisation during the reporting year.

Type of engagement	% Leading role
	○ >50%
	○ 10-50%
	○ <10%
Collaborative engagements	None

LEA 11.4

Indicate the percentage of your service provider engagements that you were highly involved in during the reporting year.

Type of engagement	% High involvement
	○ >50%
	○ 10-50%
•	○ <10%
Service provider engagements	None

LEA 11.5 Additional information. [Optional

We have participated in two collaborative engagements in 2016. CWC proposal to PRI: Elevating the S in PRI. ESG criteria in credit rating companies. There was no engagement with companies in 2016.

LEA 12	Voluntary	Public	Additional Assessed	PRI 2





I Letters to outline the engagement and the objectives

- \odot In some cases
- \bigcirc In majority cases

In all cases

- $\hfill\square$ Meetings and/or calls with the appropriate team
- □ Visits to operations
- □ Roadshows
- \square ESG research
- \Box Other, specify

LEA 12.2 Additional information. [Optional]

during the reporting year.

We sign the PRI Initiative with credit rating agencies and we have sent the CWC letter to PRI: "Elevating the S" in the PRI Strategy.



☑ Add Example 1

LEA 15.1

Topic or ESG issue	Elevating the S in PRI Strategy
Conducted by	 □ Individual / Internal ☑ Collaborative □ Service provider
Objectives	The Committee on Workers´ Capital and its members demands the PRI to improve the "S" indicators in the overall strategy of the company.
Scope and Process	We have endorsed the CWC letter, after a debate at the pension board. We have attached the letter to our fund response to the PRI consultation (consultation on the design of a sustainable financial system) and referred to it explicitly in our fund's response to the PRI consultation.
Outcomes	The PRI answered on the 19th September 2016 to the CWC: Following our general discussions on the CWC submission the Board proposed four actions. The Board has asked the PRI Executive to: 1. use the CWC correspondence as input for the PRI's forthcoming Responsible Investment Blueprint, scheduled for launch in April 2017; 2. contact CWC to discuss a potential collaborative project with ACTU and ITUC on a 'Social' themed issue; 3. explore a possible joint meeting between the CWC Board and PRI Board at the same time as the annual PRI in Person conference in September 2017 in Berlin; and 4. ensure that there is an appropriate balance of Social issues for discussion at our next PRI in Person conference.

☑ Add Example 2



Topic or ESG issue	ESG in credit rating companies
Conducted by	 □ Individual / Internal ☑ Collaborative □ Service provider
Objectives	The ultimate goal of this initiative is for the key stakeholders to work towards more systematic and transparent incorporation of ESG factors into credit ratings and assessment.
Scope and Process	The scope of this initiative includes major categories of fixed income including bonds issued by sovereigns, sub-sovereigns, financial institutions and corporates. Although still relevant, less attention will be given to supranational and structured finance instruments in this project. The PRI has suggested criteria as measures of progress for this initiative. These will be refined by the advisory committee (once established).
Outcomes	Seven credit rating agencies have signed the Statement (China Chengxin International Credit Rating Co., Ltd., Dagong Global Credit Ratings Group, Liberum Ratings, Moody's Corporation, RAM Ratings, S&P Global Ratings, Scope Ratings). 111 fixed income investors representing over US\$17.5 trillion in assets under management have also signed the Statement.

- □ Add Example 3
- □ Add Example 4
- \Box Add Example 5
- \Box Add Example 6
- \Box Add Example 7
- □ Add Example 8
- \Box Add Example 9
- □ Add Example 10

Communication LEA 16 Mandatory Public Core Assessed PRI 2,6 LEA 16.1 Indicate whether your organisation proactively discloses information on its engagements. O We disclose it publicly

 $\ensuremath{\textcircled{}}$ We disclose it to clients and/or beneficiaries only





Engagement information disclosed

- Details of the selections, priorities and specific goals of engagement
- □ Number of engagements
- □ Breakdown of engagements by type/topic
- $\hfill\square$ Breakdown of engagements by region
- □ An assessment of the current status of the engagement
- □ Outcomes that have been achieved from the engagement
- ☑ Other information

We have informed about the collaborative engagements in which we have participated. In the next communications, we will report on the evolution of the processes.

LEA 16.6 Indicate how frequently you typically report engagements information

- Disclosed continuously (prior to and post engagements)
- \odot Disclosed quarterly or more frequently
- Disclosed biannually
- \odot Disclosed annually
- \odot Disclosed less frequently than annually
- Ad hoc/when requested

 \odot We do not proactively disclose it to the public and/or clients/beneficiaries.

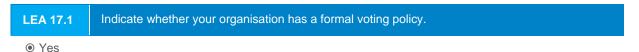
LEA 16.8 Additional information. [Optional]

We normally send two letters every year to the members of the pension fund.

(Proxy) voting and shareholder resolutions

Over	view			
LEA 17	Mandatory	Public	Gateway	PRI 1,2,3

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



55



LEA 17.2 Indicate what your voting policy covers:

- □ Conflicts of interest
- □ Prioritisation of voting activities
- ☑ Transparency
- \Box Decision making processes
- Environmental factors
- ☑ Social factors
- $\ensuremath{\boxdot}\xspace$ Governance factors
- □ Filing/co-filing resolutions
- □ Extraordinary meetings
- □ Share blocking
- □ Regional voting practices
- □ Record keeping
- □ Company dialogue pre/post vote
- □ Securities lending process
- ☑ Other, describe

other description

CCOO, the promoter of the pension fund, elaborates proxy voting recommendations on the Shareholder Meetings. We follow those recommendations.

 $\hfill\square$ None of the above



URL

http://www.ccoo.es/cms/g/public/o/0/o24074.pdf

LEA 17.4 Provide a brief overview of your organization's approach to (proxy) voting.

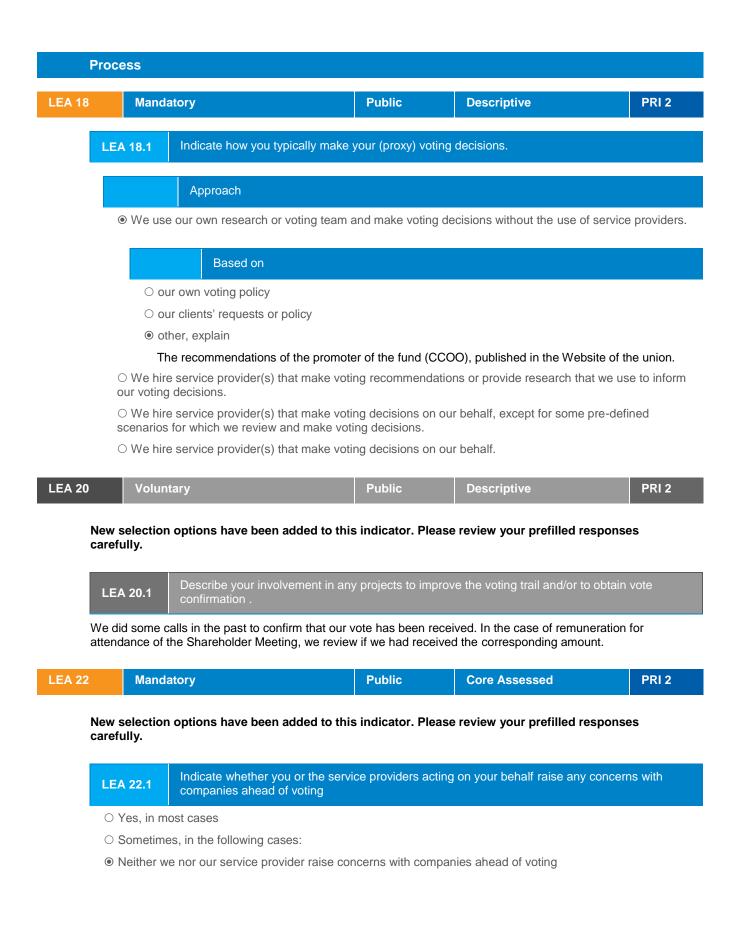
CCOO, the promoter of the pension fund, elaborates proxy voting recommendations on the Shareholder Meetings. We follow those recommendations. We consider ESG issues and a balanced remuneration among shareholders, workers, directors and executives. We also demand a "responsible dividend" (a balanced distribution between dividends and reinvestment of benefits).

LEA 17.5 Provide an overview of how you ensure your voting policy is adhered to, giving details of your approach when exceptions to the policy are made (if applicable).

In almost all cases there are no exceptions. In any case, those exceptions will be debated and the conclusion will be included in the rationale, which will be published in the Website of the trade union.

 \bigcirc No



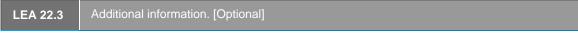




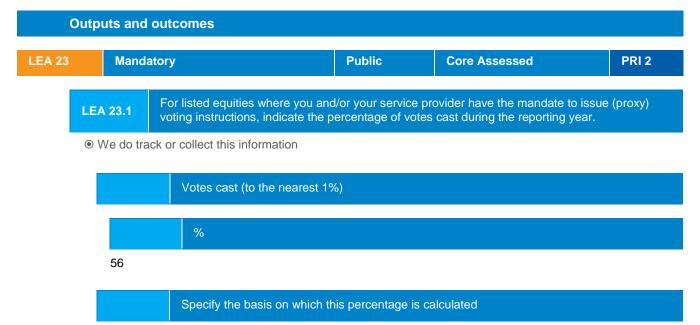
LEA 22.2 Indicate whether you and/or the service provider(s) acting on your behalf, communicate the rationale to companies, when , you abstain or vote against management recommendations.

- \odot Yes, in most cases
- \odot Sometimes, in the following cases.
- We do not communicate the rationale to companies

 \odot Not applicable because we and/or our service providers do not abstain or vote against management recommendations



CCOO, the promoter of the initiative publish the rationale and the voting recommendations in its Website.



 \odot of the total number of ballot items on which you could have issued instructions

- \odot of the total number of company meetings at which you could have voted
- ${\ensuremath{\textcircled{}}}$ of the total value of your listed equity holdings on which you could have voted



LEA 23.2 Explain your reason(s) for not voting certain holdings

- □ Shares were blocked
- $\hfill\square$ Notice, ballots or materials not received in time
- $\hfill\square$ Missed deadline
- Geographical restrictions (non-home market)
- \Box Cost
- $\hfill\square$ Conflicts of interest
- $\hfill\square$ Holdings deemed too small

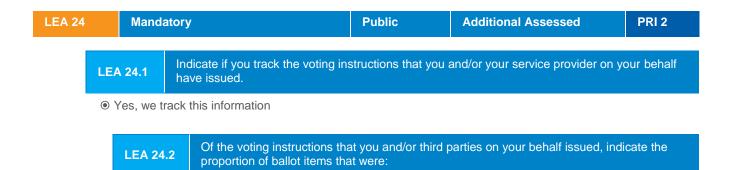
 \Box Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement)

- $\hfill\square$ We do not vote on environmental resolutions
- \Box We do not vote on social resolutions
- □ On request by clients
- □ Other

 \bigcirc We do not track or collect this information



We vote in all Spanish companies. In the future, we would like to vote abroad (firstly in Europe).





Voting instructions	Breakdown as percentage of votes cast
For (supporting) management recommendations	% 62
Against (opposing) management recommendations	% 25
Abstentions	% 13

100%

LEA 24.3 Describe the actions you take after voting against management recommendations.

We have voted against all remuneration policies.

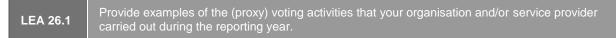
 \bigcirc No, we do not track this information

LEA 25	Voluntary	Public	Descriptive	PRI 2

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

	LEA	25.1	Indicate if your organisation direc shareholder resolutions during th		provider filed or co-filed any ESC	
	○ Yes					
	No					
		Volum	tom	Dublic	Descriptive	
LEA 26		Volun	tary	Public	Descriptive	PRI 2

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



☑ Add Example 1



Topic or ESG issue	Proxy Voting Season	
Decision made by	 ✓ Internal staff □ Collaborative □ Service provider 	
Objectives	Participate in the Shareholders Meeting of the Spanish companies in our portfolio.	
Scope and Process	Scope: Spanish companies in our portfolio. Process: we follow the proxy voting recommendations of our promoter (CCOO). The rationale of the recommendations is published in the Website of CCOO.	
Outcomes	The votes cast against the proposals of the board of directors have increased the last years in Spain. The participation of many international institutional investors has been important in recent years.	
□ Add Ex	ample 2	
□ Add Example 3		
□ Add Example 4		
□ Add Example 5		
Add Example 6		
Add Example 7		
□ Add Example 8		

We disclose it publicly

Mandatory

Add Example 9Add Example 10

Communication

LEA 27.1

LEA 27

provide URL

http://www.ccoo.es/cms.php?cd_cms_pag=12874&opc_id=5a79a386f3adccbadf8881115e85fa7c&opc_id_pr_ in=1ab811726abd2c270a515a200a07d23b

Indicate if your organisation proactively discloses information on your voting activities.

Public

Core Assessed



PRI 2,6

LEA 27.2

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

⊖ Yes

No

LEA 27.3 Indicate the voting information your organisation proactively discloses to the public.

Indicate how much of your voting record you disclose

- All voting decisions
- \odot Some voting decisions
- O Only abstentions and opposing vote decisions
- \odot Summary of votes only

Indicate what level of explanation you provide

- Explain all voting decisions
- Explain some voting decisions
- O Only explain abstentions and votes against management
- \bigcirc No explanations provided

LEA 27.4 Indicate how frequently you typically report voting information to the public.

- Continuously (primarily before meetings)
- Continuously (soon after votes are cast)
- \bigcirc Quarterly or more frequently
- \bigcirc Biannually
- Annually
- Less frequently than annually
- Ad hoc/as requested

LEA 27.5	Indicate the voting information your organisation proactively discloses to clients/beneficiaries.		
	Indicate how much of your voting record you disclose		
○ All voting decisions			
○ Some voting decisions			
\odot Only abstentions and opposing vote decisions			
Summary of votes only			



Indicate what level of explanation you provide

- \odot Explain all voting decisions
- Explain some voting decisions
- \odot Only explain abstentions and votes against management
- \bigcirc No explanations provided

LEA 27.6 Indicate how frequently you report voting information to clients/beneficiaries.

- \odot Continuously (primarily before meetings)
- \odot Continuously (soon after votes are cast)
- \bigcirc Quarterly or more frequently
- Between quarterly and annually
- \odot Less frequently than annually
- Other

LEA 27.7 Describe any other differences in the information being disclosed. [Optional]

The rationale of the proxy voting recommendations is published in the Website of CCOO, the promoter of the pension fund. We will improve the information that we send to our participants in the next years (maybe including a link to the CCOO Website).

- We disclose it to clients/beneficiaries only
- O We do not proactively disclose our voting activities to the public and/or to clients/beneficiaries

