

**Submission ID**

E08009

**Region**

Hong Kong

**Category**

Corporate Responsibility and Strength

**Name of firm**

CSOP Asset Management

**1. Firm-level Commitment to active engagement/stewardship. Please select the statement(s) that describe your approach to stewardship[i].**

\* We do NOT yet have an explicit, clearly spelled out stewardship policy/framework/principle, but we are in the process of finalizing one within the next 12 months

**2. Which ESG materiality framework are you currently using for benchmarking and/or using for reporting?**

\* SDG indicators

**3. Are you a Signatory/Member of the following sustainable programs?**

Yes

**Selected: Yes - Please select relevant sustainable programs.**

\* Principle Responsible Investment (PRI)

**4. Firm-level Responsible Investment Policy: Our firm has a clear responsible investment policy set out to govern our organization's stewardship policy [iv]:**

\* Key stewardship objectives

\* Prioritization approach of ESG factors and their link to engagement issues and targets

\* Prioritization approach depending on entity (e.g., company or government)

\* Stewardship tool usage across the organization, including tools that are out of scope and when and how different tools are used and by whom (e.g., specialist teams, investment teams, service providers, external investment managers, or similar)

\* Stewardship tool usage for specific internal teams (e.g., specialist teams, investment teams, or similar)

\* Approach to collaboration on stewardship

\* Escalation strategies

\* Conflicts of interest

\* Details on how the stewardship policy is implemented and which elements are mandatory, including how and when the policy can be overruled

\* How stewardship efforts and results should be communicated across the organization to feed into investment decision-making and vice versa

## (A) Listed equity

41.64

## (B) Fixed income

18.9

### 6. Firm-level Responsible Investment Policy Disclosure [iv]: Indicate which of your responsible investment policy elements are publicly available and provide links:

- \*  The overall approach to responsible investment
- \*  Guidelines on governance factors
- \*  Approach to stewardship
- \*  Approach to sustainability outcomes
- \*  Approach to exclusions
- \*  Asset class-specific guidelines that describe how ESG incorporation is implemented
- \*  Definition of responsible investment and how it relates to our fiduciary duty
- \*  Definition of responsible investment and how it relates to our investment objectives
- \*  Responsible investment governance structure
- \*  Internal reporting and verification related to responsible investment
- \*  External reporting related to responsible investment
- \*  Managing conflicts of interest related to responsible investment

### 7. Governance Oversight [iv]: Who, in your organization's board, chief-level staff, investment committee, and/or head of a department have formal oversight and accountability for responsible investment?

- \*  Chief-level staff (e.g., Chief Executive Officer (CEO), Chief Investment Officer (CIO), or Chief Operating Officer (COO))
- \*  Investment committee
- \*  Other chief-level staff
- \*  Head of a department

### 8. Governance Implementation [iv]: In your organization, which internal or external roles have responsibility for implementing responsible investment?

- \*  Chief-level staff (e.g., Chief Executive Officer (CEO), Chief Investment Officer (CIO), or Chief Operating Officer (COO))
- \*  Investment committee
- \*  Other chief-level staff
- \*  Head of a department
- \*  Portfolio managers
- \*  Dedicated responsible investment staff

### 9. Corporate Risk Management: Please select all statements that apply to your firm:

\*The annual bonus, both for investment and non-investment staff, is based partly on meeting investors' needs. Factors such as defending investors' interests, refraining from taking risks that are out of line with target investors' profiles, product innovation to meet investors' unmet needs, and other actions aligned with investors weight 30% or more in determining bonuses

\*The annual bonus may be clawed back if a staff member has acted out of alignment with investors' interests during any year. Examples include, but are not limited to, taking risks exceeding target investors' risk profile, trading for personal benefit over investors', making representations to distributors/investors/the public/regulators/other parties that obscure the actual situation of a fund or the firm, among other possible infringements of fiduciary or moral responsibility to investors

\*We have clear, unambiguous procedures AND protections for whistleblowing

\*Members of our board of directors include the Chief Compliance Officer (who is NOT also concurrently playing the role/s of CEO, Chairman, or another individual who is already on the board)

#### **Additional remarks, if any (maximum 250 words)**

Not Applicable

#### **11. Transparency about material redemptions[i]: This question relates to your firm's duty of care**

We inform investors/intermediaries within 1 business day

#### **12. Transparency about key man events: When the key manager/s responsible for a Fund have resigned, are retiring, will be transferred to a different responsibility, are indisposed, seriously ill, going on maternity leave, or are otherwise incapacitated, when do you inform investors[ii]?**

We do not inform investors/intermediaries

#### **13. Skin in the game: Does your firm have a policy requiring the key portfolio managers to invest their personal wealth into the funds they manage, as external investors, with no special concessions on the SAME terms?**

No, and we have no plans to have such a policy

#### **14. AUM change, 3Y: How has your firm's total assets under management (AUM)[iii] changed in the last 3 years?**

Inception period less than 3 years

#### **15. Distribution channel mix: This question applies to ALL of your firm's COMINGLED fund products distributed in Asia ex-Japan, including funds not participating in this exercise; please exclude segregated mandates. What channels are the products distributed through currently?**

\*Private banks

\*Retail banks

\*Direct distribution to institutional asset owners (family offices, pension funds, insurance companies' general assets, corporates, sovereign wealth funds, official institutions, foundations, endowments, and other institutions). Please note this relates to comingled funds, NOT segregated mandates.

**16. Distribution channel growth, 3Y: This question relates to ALL your firm's commingled funds distributed in Asia ex-Japan, including funds not participating in this exercise; please exclude segregated mandates. How many new distribution channels were gained or lost in the last 3 years?**

Gained more than 10 distribution channels

**17. Compliance: Has your firm, or its officers, breached any regulatory, legal or other compliance thresholds in the last 5 years?**

No, we have not made any breaches