



# RITRANSPARENCY REPORT 2020

## Landsbankinn hf.





#### About this report

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

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

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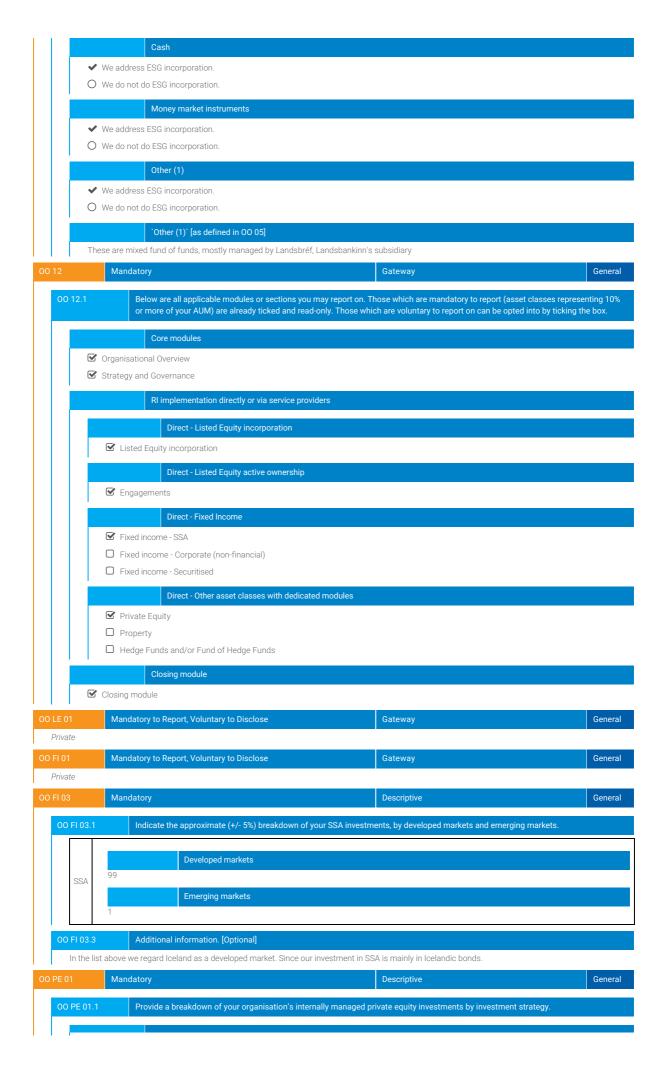


0 01.1	Select the ser	vices and funds you offer	
Select the services and funds you offer	% of asset under management (AUM) in ranges		
Fund management	<ul><li>○ 0%</li><li>○ &lt;10%</li><li>○ 10-</li><li>50%</li><li>✓ &gt;50%</li></ul>		
Fund of funds, manager of managers, sub-advised products	○ 0%  ✓ <10%  ○ 10-  50%  ○ >50%		
Other	<ul><li>○ 0%</li><li>✓ &lt;10%</li><li>○ 10-50%</li><li>○ &gt;50%</li></ul>	Please specify Discretionary asset management	
Total 100%			
Ma	indatory	Peering	Ge
0 02.1		ation of your organisation's headquarters.  number of countries in which you have offices (including your headquarters).	
o 02.2 ✓ 1			
0 02.2  ✓ 1  ○ 2-5  ○ 6-10  ○ >10  0 02.3	Indicate the n		
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Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes and investment strategies: Externally managed (%) Internally managed (%) Listed equity 10-50% 0 Fixed income 10-50% 0 0 Private equity 10-50% <10% 0 Property Infrastructure 0 0 Commodities 0 0 Hedge funds <10% 0 Fund of hedge funds 0 0 Forestry 0 0 Farmland 0 0 Inclusive finance 0 0 Cash 10-50% 0 Money market instruments <10% 0 Other (1), specify <10% 0 Other (2), specify 0 0 Internally managed `Other (1)` description Mixed funds managed by Landsbréf, Landsbankinn's subsidiary. Select how you would like to disclose your asset class mix. O as percentage breakdown ✓ as broad ranges O Yes **✓** No Indicate whether your organisation uses fiduciary managers. O Yes, we use a fiduciary manager and our response to 00 5.1 is reflective of their management of our assets.  $\checkmark$  No, we do not use fiduciary managers. Mandatory to Report, Voluntary to Disclose Private Indicate the breakdown of your organisation's AUM by market. 99 Developed Markets **Emerging Markets** Other Markets Additional information. [Optional] Iceland is not listed in the MSCI breakdown. Iceland, our home market, is part of EEA and uses the same regulation framwork as EU's single market, as such

we categorize it as a Developed Market. AUM in Iceland is about 85% of total AUM.

00 10	Mandatory	Gateway	General
00 10.1	Select the active ownership activities your organisation implement	ed in the reporting year.	
	Listed equity – engagement		
✓	We engage with companies on ESG factors via our staff, collaborations or s	ervice providers.	
	We do not engage directly and do not require external managers to engage		
	Listed equity – voting		
	We cast our (proxy) votes directly or via dedicated voting providers		
✓	We do not cast our (proxy) votes directly and do not require external manage	ers to vote on our behalf	
	00 10.3 Indicate why you do not cast your votes		
	✓ Indicate why you do not cast your votes		
	As an asset management we always invest on behalf of our cust	omers and serve as a third party.	
	O We do not cast our votes but provide substantive research and votin	ng recommendations to our clients.	
	Fixed income SSA – engagement		
	<ul> <li>We engage with SSA bond issuers on ESG factors via our staff, collabora</li> </ul>	tions or service providers.	
	☐ We do not engage directly and do not require external managers to engage		hy you do
	not.		
	Fixed income Corporate (non-financial) – engagement		
	<ul> <li>We engage with companies on ESG factors via our staff, collaborations of the companies of the c</li></ul>		ı do not
		ge with companies on ESG factors. Please explain why you	Tuo not.
	Fixed income Corporate (securitised) – engagement  We engage with companies on ESG factors via our staff, collaborations of	or conjuga providera	
	<ul> <li>We engage with companies on ESG factors via our starr, conaborations of</li> <li>We do not engage directly and do not require external managers to engage</li> </ul>		ı do not.
00 11	Mandatory	Gateway	General
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00 11.1	Select the internally managed asset classes in which you addresse active ownership practices (during the reporting year).	to ESG incorporation into your investment decisions and/o	r your
	Listed equity		
	We address ESG incorporation.		
	We do not do ESG incorporation.		•
	Fixed income - SSA		
	We address ESG incorporation.  We do not do ESG incorporation.		
	Fixed income - corporate (non-financial)		
~	We address ESG incorporation.		
	We do not do ESG incorporation.		
	Fixed income - securitised		
~	We address ESG incorporation.		
0	We do not do ESG incorporation.		
	Private equity		
~	We address ESG incorporation.		
0	We do not do ESG incorporation.		
	Property		
	We address ESG incorporation.		
	We do not do ESG incorporation.		
	Hedge funds		
	We do not do ESG incorporation.  We do not do ESG incorporation.		
	35 31 do E55 moorpordion.		



Investment strategy	Percentage of your internally managed private equity holdings (in terms of AUM)
Venture capital	<ul><li>&gt;50%</li><li>10-50%</li><li>✓ &lt;10%</li><li>0%</li></ul>
Growth capital	<ul><li>✓ &gt;50%</li><li>○ 10-50%</li><li>○ &lt;10%</li><li>○ 0%</li></ul>
(Leveraged) buy-out	<ul><li>&gt;50%</li><li>✓ 10-50%</li><li>&lt;10%</li><li>0%</li></ul>
Distressed/Turnaround/Special Situations	>50% 10-50% ✓ <10% 0%
Secondaries	>50% 10-50% <10% ✓ 0%
Other investment strategy, specify (1)	>50% 10-50% <10% ✓ 0%
Other investment strategy, specify (2)	>50% 10-50% <10% ✓ 0%
Total 100%	

00 PE 02	Mandatory to Report, Voluntary to Disclose	Descriptive	General
Private			'
00 PR 01	Mandatory to Report, Voluntary to Disclose	Descriptive	General
Private			
00 PR 02	Mandatory to Report, Voluntary to Disclose	Gateway	General
Private			
00 PR 03	Mandatory to Report, Voluntary to Disclose	Descriptive	General
Private			
00 HF 01	Mandatory to Report, Voluntary to Disclose	Descriptive	General
Private			
00 Checks			Checks
<b>☑</b> If there	are any messages below, please review them before continuing. If there are	no messages below, please save this page and continue.	

		datory	Core Assessed	Gene
		Indicate if you have an investment policy that cov	rers your responsible investment approach.	
Yes				
SG	01.2	Indicate the components/types and covera	age of your policy.	
	Policy o	components/types	Coverage by AUM	
		Policy setting out your overall approach Formalised guidelines on environmental factors Formalised guidelines on social factors Formalised guidelines on corporate governance factoriation (or equivalent) duties Asset class-specific RI guidelines Sector specific RI guidelines Screening / exclusions policy Other, specify (1)	ctors  O Applicable policies cover all AUM  ✓ Applicable policies cover a majority of AUM O Applicable policies cover a minority of AUM	
	_	Other, specify(2)		
SG	01.3	Indicate if the investment policy covers any	y of the following	
		organisation's definition of ESG and/or responsible		
	Time Gove ESG Activ Repc Clim. Unde	e investment objectives that take ESG factors/real electorizon of your investment ernance structure of organisational ESG responsibilincorporation approaches we ownership approaches orting attechange erstanding and incorporating client / beneficiary surier RI considerations, specify (1) er RI considerations, specify (2)	lities	
SG	01.4		rinciples and overall investment strategy, interpretation of and real economy impact.	fiduciary (or equivalent
		Describe your organisation's investment p	and real economy impact.	fiduciary (or equivalent
	Assessm	Describe your organisation's investment p duties, and how they consider ESG factors	and real economy impact.	fiduciary (or equivalent
	Assessm » Landsb	Describe your organisation's investment p duties, and how they consider ESG factors nent of investments shall take the following into acc	and real economy impact.	fiduciary (or equivalent
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	Council of Institutional Investors (CII)
	Eumedion
	Extractive Industries Transparency Initiative (EITI)
	ESG Research Australia
	Invest Europe Responsible Investment Roundtable
	Global Investors Governance Network (GIGN)
	Global Impact Investing Network (GIIN)
	Global Real Estate Sustainability Benchmark (GRESB)
_	Green Bond Principles
¥	Green Bond Principles
	Your organisation's role in the initiative during the reporting period (see definitions)
	Moderate
	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
	Landsbankinn has systematically built up knowledge and developed expertise in green bonds issuance and is of course adhering to the Green bond principles.
	Landsbankinn has played a leading role in educating the domestic investment community, has held many educational meetings and as well as private consultations.
_	HKVCA: ESG Committee
	Interfaith Center on Corporate Responsibility (ICCR)
	International Corporate Governance Network (ICGN)
	Investor Group on Climate Change, Australia/New Zealand (IGCC)
	International Integrated Reporting Council (IIRC)
	Investor Network on Climate Risk (INCR)/CERES
	Local Authority Pension Fund Forum
	Principles for Financial Action in the 21st Century
	Principles for Sustainable Insurance
$\checkmark$	Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
	IcelandSIF
	Vary appropriation and in the initiative during the constitue using definitions.
	Your organisation's role in the initiative during the reporting period (see definitions)
	Advanced
	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
	Landsbankinn plays a key role in the ongoing operations of the IcelandSIF organisation. One employee of Landsbankinn serves as director of the
	board and another employee plays a leading role in IcelandSIF's education committee. Landsbankinn will be leading the SIF meeting to be held in Harpa Conference Hall in the May 2021 and preperation is already under way.
	Landsbankinn employees participated in 6 educational events held in the IcelandSIF forum and the Bank was also actively involved in organisation of the events.
	Responsible Finance Principles in Inclusive Finance
_	
1.1	
	Shareholder Association for Research and Education (Share)
	Shareholder Association for Research and Education (Share)
	Shareholder Association for Research and Education (Share) United Nations Environmental Program Finance Initiative (UNEP FI)
	Shareholder Association for Research and Education (Share)  United Nations Environmental Program Finance Initiative (UNEP FI)  Your organisation's role in the initiative during the reporting period (see definitions)  Moderate
	Shareholder Association for Research and Education (Share)  United Nations Environmental Program Finance Initiative (UNEP FI)  Your organisation's role in the initiative during the reporting period (see definitions)
	Shareholder Association for Research and Education (Share) United Nations Environmental Program Finance Initiative (UNEP FI)  Your organisation's role in the initiative during the reporting period (see definitions)  Moderate  Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]  Landsbankinn was a founding member in 1992. In 2019, Landsbankinn became a founding signatory of the PRBs and attended the signing and
	Shareholder Association for Research and Education (Share)  United Nations Environmental Program Finance Initiative (UNEP FI)  Your organisation's role in the initiative during the reporting period (see definitions)  Moderate  Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
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✓	Shareholder Association for Research and Education (Share)  United Nations Environmental Program Finance Initiative (UNEP FI)  Your organisation's role in the initiative during the reporting period (see definitions)  Moderate  Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]  Landsbankinn was a founding member in 1992. In 2019, Landsbankinn became a founding signatory of the PRBs and attended the signing and launch of the initiative at the UN General Assembly in New York, joining a coalition of 130 banks from around the world. The Principles are intended to strategically align financial activity with the UN's Sustainable Development Goals and the Paris Climate Agreement.  United Nations Global Compact  Your organisation's role in the initiative during the reporting period (see definitions)  Moderate  Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
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✓	United Nations Environmental Program Finance Initiative (UNEP FI)  Your organisation's role in the initiative during the reporting period (see definitions)  Moderate  Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]  Landsbankinn was a founding member in 1992. In 2019, Landsbankinn became a founding signatory of the PRBs and attended the signing and launch of the initiative at the UN General Assembly in New York, joining a coalition of 130 banks from around the world. The Principles are intended to strategically align financial activity with the UN's Sustainable Development Goals and the Paris Climate Agreement.  United Nations Global Compact  Your organisation's role in the initiative during the reporting period (see definitions)  Moderate  Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]  Landsbankinn publishes an annual ESG Report based on the principles of the Global Reporting Initiative. The report also serves as the annual communication on progress report to the UN Global Compact. The Report contains detailed information about the Bank's sustainability platform and its impact on the environment and society.

N	Anndatory Core Assessed Pl
10.1	Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.
✔ Yes	
SG 10.2	Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiati Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.
	Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for ostment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)
	Description
	All portfolio managers completed RI training from the PRI Academy. After signing the PRBs, the Bank presented benchmarks for rebanking internally for the Bank's staff.
	Frequency of contribution
	O Quarterly or more frequently
	O Biannually
	O Annually
	O Less frequently than annually
	✓ Ad hoc
	O Other
✓	Provided financial support for academic or industry research on responsible investment
	Description
[	Played an important role in the IcelandSIF organisation
	Frequency of contribution
	O Quarterly or more frequently
	O Biannually
	O Annually
	O Less frequently than annually
	✓ Ad hoc
	O Other
✓ :	Provided input and/or collaborated with academia on RI related work
	Description
	Landsbankinn collaborates with the University of Iceland to develop case studies and training about ESG metrics and criteria settir Bank also provides other support and sponsors the courses. Landsbankinn participated in a MS degree class at the University of Ichow to generate Responsible reporting. Landsbankinn has had University Students in training in the investment team, students the studying RI. Landsbankinn has also invited University student's to visit our Investment team to learn about our investment process RI.
	Frequency of contribution
	O Quarterly or more frequently
	O Biannually
	O Annually
	O Less frequently than annually
	✓ Ad hoc
	O Other
☑ :	Encouraged better transparency and disclosure of responsible investment practices across the investment industry
	Description
	Distributed questionnaires and collected information about ESG issues within the Icelandic equity market. Collaborated with Nasdatranslate and promote the ESG questionnaire that Icelandic issuers will have opportunity to respond to in coming months.
	Frequency of contribution

	O Ad hoc
	O Other
☑	Spoke publicly at events and conferences to promote responsible investment
	Description
	Landsbankinn has participated in many public events and conferences: - Speech about Responsible Investment with a special focus on green bond issues delivered to employees of Reykjavik City - Speech about Responsible Investment delivered to the Association of Internal
	Auditors - Speech about the Global Compact delivered to the Business Associations - Speech about Responsible Investment delivered to the
	Young Investor Associations - Speech about future sustainability delivered to Rannís, Nýsköpunarmiðstöð Íslands, Íslandsstofu and Nýsköpunarsjóð
	Frequency of contribution
	O Quarterly or more frequently
	O Biannually
	O Annually
	O Less frequently than annually
	✓ Ad hoc
	O Other
_	Wrote and published in-house research papers on responsible investment
	Encouraged the adoption of the PRI
_	Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)
₩	Wrote and published articles on responsible investment in the media
	Description
	Articles published officially and in-house about RI and Green bonds. https://www.landsbankinn.is/frettir/2019/07/04/Landsbankinn-og-
	Landsbref-taka-innleidingu-abyrgra-fjarfestinga-a-naesta-skref/
	Frequency of contribution
	O Quarterly or more frequently
	O Biannually
	O Annually
	O Less frequently than annually
	✓ Ad hoc
	O Other
	A member of PRI advisory committees/ working groups, specify
<b></b>	On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
	Description
	A Landsbankinn fund manager is on the board of directors of IcelandSIF; another employee is a member of an IcelandSIF advisory group.  One Landsbankinn employee is a member of the Environmental group of the Iceland Chamber of Commerce. One Landsbankinn employee is
	organizing the 2021 meeting for Nordic SIF's to be held in May 2021.
	Frequency of contribution
	✓ Quarterly or more frequently
	O Biannually
	O Annually
	O Less frequently than annually
	O Ad hoc
	O Other
	Other, specify
O No	
3 10.3	Describe any additional actions and initiatives that your organisation has taken part in during the reporting year to promote responsible
	investment [Optional]
incorperate	nkinn is working with a third party provider to set up ESG metrics and criteria for Icelandic issuers. We are updating our valuation models to e ESG ratings. An agreement providing for ESG risk ratings was signed in June 2019. Link to an article about the venture: ww.landsbankinn.com/news-and-notifications/2019/07/04/Landsbankinn-and-Landsbref-Take-the-Next-Step-in-their-Introduction-of-Reponsible- ?p=14
_	rkinn signed an agreement with MorningStar to get support on foreign ESG ratings for equities, bonds and funds.
> Landsbar	nkinn published an article about how ESG factors influence the company valuation:  oraedan.landsbankinn.is/umraedan/samfelagid/fyrirtaeki-metin-ut-fra-samfelagsabyrgd/
	nkinn published an article about our goals under the UN Global Compact: oraedan.landsbankinn.is/umraedan/samfelagid/heimsmarkmid/
> Landsba	nkinn signed the PRBs of UNEP FI in October 2019: https://corporate.landsbankinn.com/media/news-and-

notifications/2019/09/23/Landsbank in n-becomes-a-founding-signatory-of-the-UNs-Principles-for-Responsible-Banking/?p=8

- > Landsbankinn's client achieved certification of a green bond framework: https://www.landsbankinn.com/news-and-notifications/2019/10/31/Green-bond-framework-of-Municipality-Credit-Iceland/?p=9
- > Participation in events with IcelandSIF about the presentation, revision and monitoring of non-financial information (ESG): https://www.icelandsif.is/vidburdir/morgunfundur-um-framsetningu-endursko%C3%B0un-og-eftirlit-me%C3%B0-%C3%B3fj%C3%A1rhagslegum-uppl%C3%BDsingum-21-n%C3%B3vember/
- > Landsbankinn published an article and media interview about the increase in demand of green bond issuance: https://www.ruv.is/frett/heildarverdmaeti-graenna-skuldabrefa-firmmfaldast-fra-2015
- > Published newspaper articler about green financing for green community project: https://www.vb.is/skodun/graen-fjarmognun-graenum-verkefnum-sveitarfelaganna/159104/
- > Landsbankinn recieved a very good ESG rating from Sustainalytics: https://www.landsbankinn.com/news-and-notifications/2019/11/18/Landsbankinn-receives-positive-review-in-CSR-from-Sustainalytics/?p=8
- > Landsbankinn held a speech about GRI reporting at a GRI Masterclass training held by Festa, Centre for Corporate Social Responsibility.

SG	11 Private	Volu	ntary	Additional Assessed	PRI 4,5,6
SG	12	Man	datory	Core Assessed	PRI 4
	_		Indicate whether your organisation uses investment of investment consultants by use investment consultants.	onsultants.	
SG	13	Man	datory	Descriptive	PRI 1
	SG 13.1		Indicate whether the organisation carries out scenario analysis (by asset class, sector, strategic asset alloca	analysis and/or modelling, and if it does, provide a description, etc.).	tion of the scenario
	☐ Yes, i	n order	to assess future ESG factors to assess future climate-related risks and opportunities nisation does not currently carry out scenario analysis a	ind/or modelling	
	SG 13.3	nkinn is	Additional information. [OPTIONAL] working with a third party provider to develope metrics:	and criteria for ESG factors for Icelandic issuers	
SG			datory to Report, Voluntary to Disclose	Additional Assessed	PRI 1
	Private				
SG	14 CC	Volu	ntary		General
	Private				
SG	15 Private	Man	datory to Report, Voluntary to Disclose	Descriptive	PRI 1
SG		Man	datory	Descriptive	General
	Private				
SG	18	Volu	ntary	Descriptive	General
1	Private				
SG	19	Man	datory	Core Assessed	PRI 2, 6
	SG 19.1		Indicate whether your organisation typically discloses to clients/beneficiaries and the public, and provide a U	asset class specific information proactively. Select the freq RL to the public information.	uency of the disclosure
			Listed equity - Incorporation		
			Do you disclose?		
		O w	e do not proactively disclose it to the public and/or client e disclose to clients/beneficiaries only. e disclose it publicly	s/beneficiaries	
			Listed equity - Engagement		
			Do you disclose?		
		O W	e do not disclose to either clients/beneficiaries or the put e disclose to clients/beneficiaries only. e disclose to the public	olic.	
			Fixed income		
			Do you disclose?		

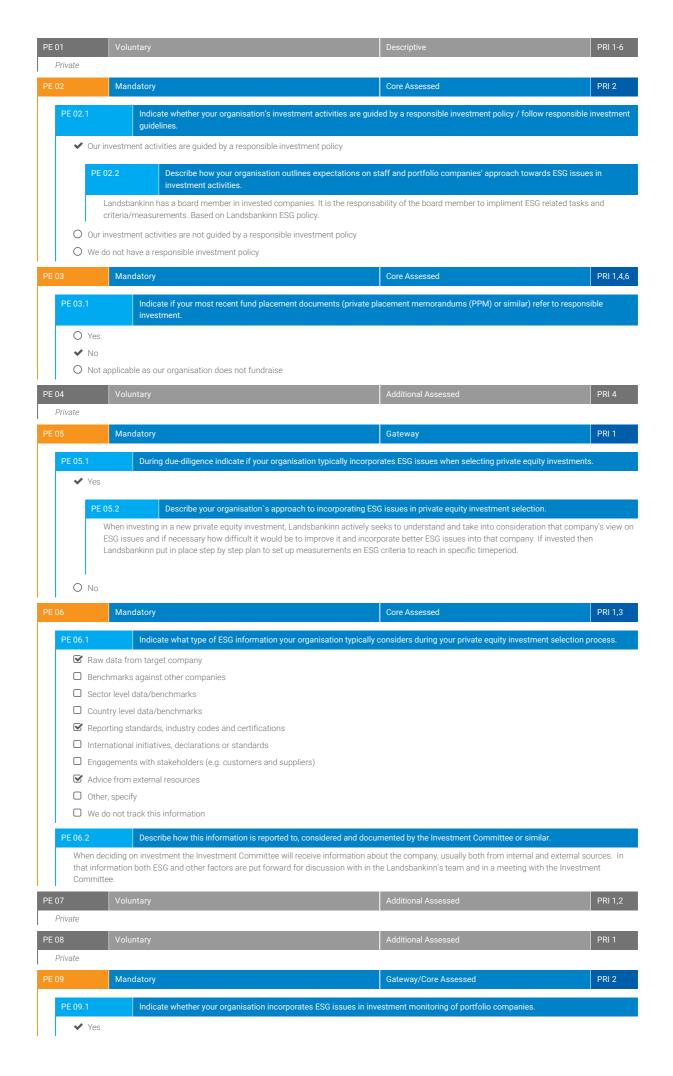
	✓ We do not disclose to either clients/beneficiaries or the public.	
	O We disclose to clients/beneficiaries only.	
	O We disclose to the public	
	Private equity	
	Do you disclose?	
	✓ We do not disclose to either clients/beneficiaries or the public.	
	O We disclose to clients/beneficiaries only.	
	O We disclose to the public	
	Hedge Funds	
	Do you disclose?	
	✓ We do not disclose to either clients/beneficiaries or the public.	
	O We disclose to clients/beneficiaries only.	
	O We disclose to the public	
SG Checks		С

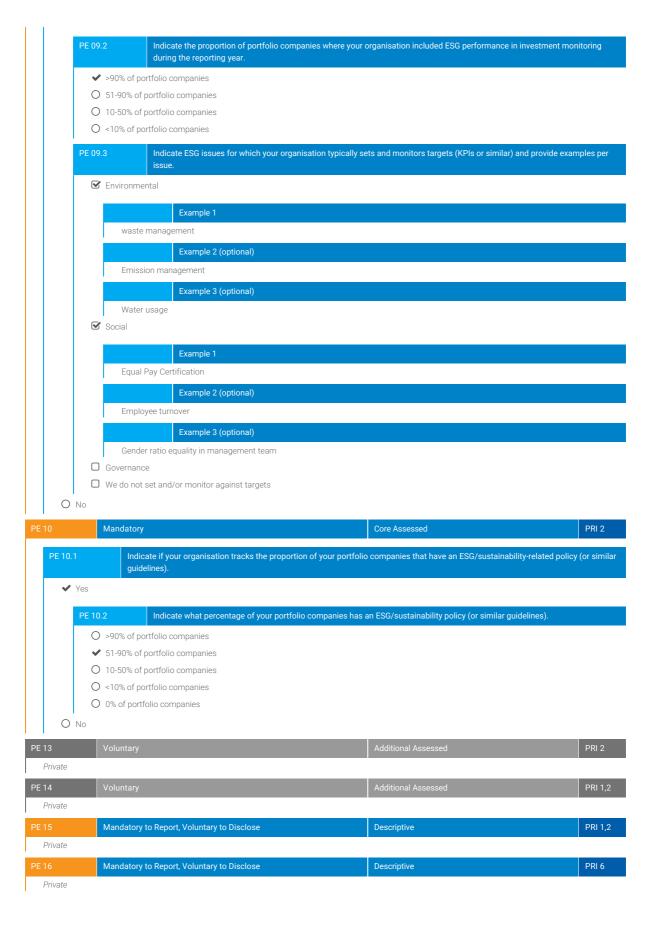
LEI	01	Man	datory	Gateway	PRI 1	
	LEI 01.1		Indicate which ESG incorporation strategy and/or combination of s breakdown of your actively managed listed equities by strategy or		es; and the	
		Scree	ning alone (i.e., not combined with any other strategies)			
		Them	atic alone (i.e., not combined with any other strategies)			
		Integr	ration alone (i.e., not combined with any other strategies)			
		Scree	ning and integration strategies			
		Them	atic and integration strategies			
		☐ Screening and thematic strategies				
		☐ All three strategies combined				
	<b>∀</b>	We do	o not apply incorporation strategies			
		Pe	ercentage of active listed equity to which the strategy is applied — you	may estimate +/- 5% 100%		
LEI		Man	datory to Report, Voluntary to Disclose	Descriptive	PRI 1	
	Private					
LEI	Checks				Checks	
	☑ If there	are an	y messages below, please review them before continuing. If there are	no messages below, please save this page and continue.		

A 01	Mandatory	Core Assessed			
LEA 01.1	Indicate whether your o	organisation has an active ownership policy (includes engagement and/or voting).			
O Yes					
✔ No	✔ No				
LEA 01.4	Do you outsource any o	of your active ownership activities to service providers?			
O Yes					
✓ No					
A 02	Mandatory	Core Assessed	PR		
LEA 02.1	LEA 02.1 Indicate the method of engagement, giving reasons for the interaction.				
Type of engagement		Reason for interaction			
Individu	ual / Internal staff engagements	<ul> <li>□ To influence corporate practice (or identify the need to influence it) on ESG issues</li> <li>☑ To encourage improved/increased ESG disclosure</li> <li>☑ To gain an understanding of ESG strategy and/or management</li> <li>□ We do not engage via internal staff</li> </ul>			
Collabo	orative engagements	<ul> <li>✓ To influence corporate practice (or identify the need to influence it) on ESG issues</li> <li>✓ To encourage improved/increased ESG disclosure</li> <li>✓ To gain an understanding of ESG strategy and/or management</li> <li>□ We do not engage via collaborative engagements</li> </ul>			
	.,	☐ To influence corporate practice (or identify the need to influence it) on ESG issues☐ To encourage improved/increased ESG disclosure			
Service	provider engagements	☐ To gain an understanding of ESG strategy and/or management  ☑ We do not engage via service providers			
Service A 03	e provider engagements  Mandatory		PR		
A 03	Mandatory	✓ We do not engage via service providers Core Assessed	PR		
	Mandatory	☑ We do not engage via service providers	PR		
A 03	Mandatory	✓ We do not engage via service providers Core Assessed	PR		
LEA 03.1  ○ Yes  ✔ No	Mandatory	✓ We do not engage via service providers Core Assessed			
A 03  LEA 03.1  ○ Yes  ✓ No	Mandatory  Indicate whether your of the second of the seco	We do not engage via service providers  Core Assessed  organisation has a formal process for identifying and prioritising engagements.  Core Assessed	PR PR		
LEA 03.1  O Yes	Mandatory  Indicate whether your of the second of the seco	We do not engage via service providers  Core Assessed  organisation has a formal process for identifying and prioritising engagements.			
A 03  LEA 03.1  ○ Yes  ✓ No  A 04  LEA 04.1	Mandatory  Indicate whether your of the second of the seco	We do not engage via service providers  Core Assessed  organisation has a formal process for identifying and prioritising engagements.  Core Assessed	PR		
A 03  LEA 03.1  ○ Yes  ✓ No  A 04  LEA 04.1	Mandatory  Indicate whether your of the state of the stat	Core Assessed  Core Assessed  Core Assessed  Core Assessed  Core Assessed  Core Assessed  All engagement activities  Majority of engagement activities  Minority of engagement activities	PR al staff		
A 03  LEA 03.1  ○ Yes  ✓ No  A 04  LEA 04.1	Mandatory  Indicate whether your of the state of the stat	Core Assessed  All engagement activities  Majority of engagement activities  Minority of engagement activities  Minority of engagement activities  All engagement activities  Minority of engagement activities	PR al staff		
LEA 03.1  O Yes  No  A 04  LEA 04.1  Individu	Mandatory  Indicate whether your of the state of the stat	Core Assessed  Core A	al staff		

		Collabor	ative engagements	<ul> <li>✓ Yes, in all cases</li> <li>✓ Yes, in a majority of cases</li> <li>✓ Yes, in a minority of cases</li> <li>✓ We do not monitor, or review engage collaboration.</li> </ul>	ement outcomes when the engagen	nent is carried out throug	gh
LEA	06		Mandatory		Additional Assessed		PRI 2,4
	LEA 06.1 Indicate whether your o		Indicate whether your o	organisation has an escalation strategy whe	en engagements are unsuccessful.		
		O Yes ✔ No					
LEA	.07		Voluntary		Additional Assessed		PRI 1,2
H	Private						
LEA	.08		Mandatory		Gateway		PRI 2
	LEA 08.1 Indicate whether you track the number of your engagement activities.						
		Type of	engagement	Tracking engagements			
			engagement al/Internal staff engagements	Tracking engagements  O Yes, we track the number of our endown of Yes, we partially track the number of Yes, we do not track			
		Individu		O Yes, we track the number of our en	of our engagements		
LEA	. 10	Individu	al/Internal staff engagements	O Yes, we track the number of our endorse.  O Yes, we partially track the number of the work with the number of the contrack.  O Yes, we track the number of collaboration.  O Yes, we partially track the number of the number o	of our engagements		PRI 2
LEA	Priva 11	Individu  Collaborate	al/Internal staff engagements	O Yes, we track the number of our endorse.  O Yes, we partially track the number of the work with the number of the contrack.  O Yes, we track the number of collaboration.  O Yes, we partially track the number of the number o	of our engagements  orative engagements in full  of our collaborative engagements		PRI 2
LEA	Priva	Individu  Collabor  te	al/Internal staff engagements rative engagements  Voluntary	O Yes, we track the number of our endorse.  O Yes, we partially track the number of the work with the number of the contrack.  O Yes, we track the number of collaboration.  O Yes, we partially track the number of the number o	of our engagements  orative engagements in full  of our collaborative engagements  Additional Assessed		

01	Mandatory	Gateway	PRI 1			
FI 01.1	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.					
	Screening alone					
	Thematic alone					
	Integration alone					
	Screening + integration strategies					
SSA	Thematic + integration strategies					
	Screening + thematic strategies					
	All three strategies combined					
	No incorporation strategies applied					
FI 01.2	Describe your reasons for choosing a particular E	Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.				
No officia	rements we address in regards to ESG factors. We are also	f our bond holdings are in Icelandic government bonds and a o actively supporting the new Green bonds market in Iceland				
14	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2			
Private 15	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1,2			
Private						
16 Private	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1,2			
17	Mandatory to Report, Voluntary to Disclose	Additional Assessed	General			
Private						





CM	1 01	Mandatory	Additional Assessed	General			
	CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:					
	☐ Third	☐ Third party assurance over selected responses from this year's PRI Transparency Report					
	☐ Third	party assurance over data points from other sources that have subseque	ntly been used in your PRI responses this year				
	☐ Third	party assurance or audit of the correct implementation of RI processes (	ssurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year)				
	☐ Intern	al audit of the correct implementation of RI processes and/or accuracy of	f RI data (that have been reported to the PRI this year)				
	☐ Intern	al verification of responses before submission to the PRI (e.g. by the CEO	or the board)				
	<b>☑</b> Other,	specify	pify				
	Ver	Verified by Managing Director of Markets					
	☐ None	of the above					
CM	1 02	Mandatory	Descriptive	General			
	CM1 02.1	We undertook third party assurance on last year's PRI Transpare	ency Report				
	O Whole	Transparency Report was assured last year					
	O Select	ta was assured in last year's PRI Transparency Report					
	✓ We did not assure last year's PRI Transparency report						
	O None	of the above, we were in our preparation year and did not report last year					
CM	1 03	Mandatory	Descriptive	General			
	CM1 03.1	We undertake confidence building measures that are unspecific	to the data contained in our PRI Transparency Report:				
	☐ We ad	here 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 a	udit of holdings					
	Other,	specify					
	<b>☑</b> None	of the above					
CM	1 04	Mandatory	Descriptive	General			
	CM1 04.1	Do you plan to conduct third party assurance of this year's PRI	Fransparency report?				
	O Whole	PRI Transparency Report will be assured					
	O Select	O Selected data will be assured					
	<b>✓</b> We do	✓ We do not plan to assure this year`s PRI Transparency report					