

PRI REPORTING FRAMEWORK 2020

Direct — Hedge Funds

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Understanding this document

In addition to the detailed indicator text and selection options, in each module of the PRI Reporting Framework you can find information that will help you identify which indicators are relevant to your organisation.

Top bar

Key information about each indicator is highlighted in the top bar, including the indicator status (mandatory or voluntary), the purpose of the indicator and the PRI Principle to which it relates.

	Indicator status	Purpose	Principle
xxx 01	MANDATORY	CORE ASSESSED	PRI 2

Indicator status

MANDATORY Mandatory indicators reflect core practices. These responses will be made public and must be completed to submit the framework. Some indicators are mandatory to complete, but voluntary to disclose. These indicators may determine which subsequent indicators are applicable or are used for peering, but they may also contain commercially sensitive information. Voluntary indicators reflect alternative or advanced practices. These indicators are voluntary to report and disclose.

Purpose

Purpose		
Gateway	ο,	The responses to this indicator 'unlock' other indicators within a module if they are relevant to your organisation. Please refer to the logic box for more information.
Peering		These indicators are used to determine your peer groups for assessment purposes.
Core assessed	*	These indicators form the core of the assessment and represent the majority of your final assessment score.
Additional assessed	* *	These indicators represent more advanced or alternative practices and contribute to a smaller part of your score.
Descriptive		These are open-ended narrative indicators, allowing you to describe your activities.

Underneath the indicator

Underneath the indicator, you can find explanatory notes and definitions which include important information on interpreting and completing the indicators. Read the logic box to make sure an indicator is applicable to you.

xxx 01	EXPLANATORY NOTES
xxx 01.1 xxx 01.2 LOGIC	This provides guidance on how to interpret the sub- indicators, including examples of what can be reported.
xxx 01	This explains when this indicator is applicable and/or if it has an impact on subsequent indicators. If there is no logic box, the indicator is always applicable and does not affect other indicators.

xxx 01	DEFINITIONS
xxx 01	Specific terms that are used in the indicator are defined here.

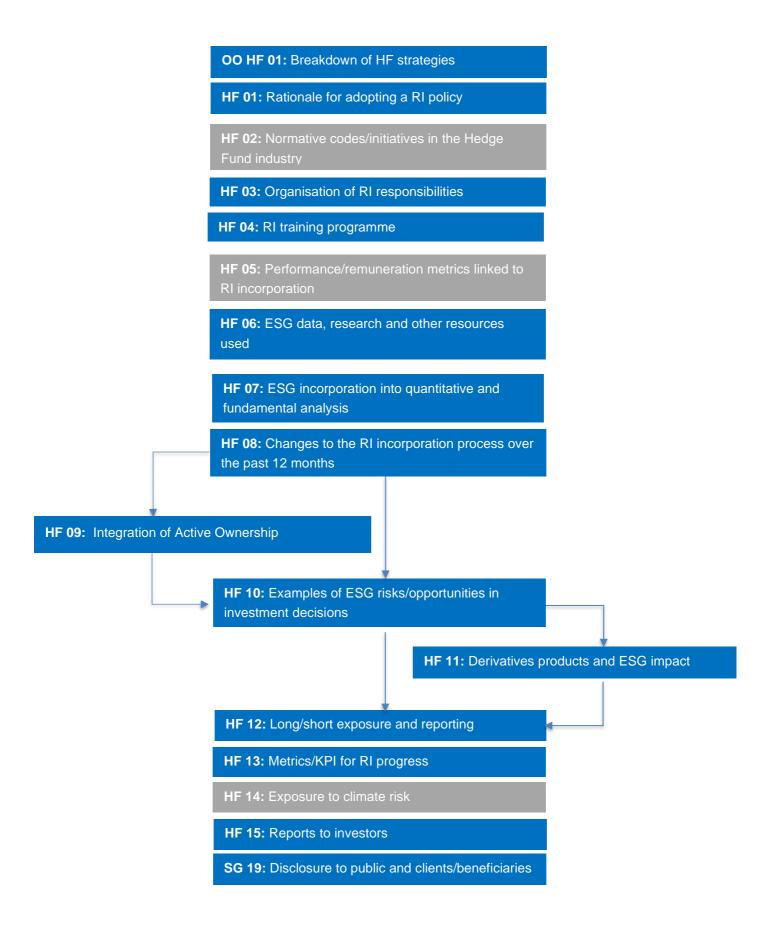


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Pathways through the module



Preface

The information reported in this module will enable your stakeholders to understand your organisation's overall approach to responsible investment (e.g., governance, responsible investment policy, objectives and targets, resources allocated to responsible investment, and your approach to collaborations on responsible investment and public policy-related issues), and the incorporation of ESG issues into asset allocation.

It is mandatory for all PRI signatories to complete this module if more than 10% of their assets under management (AUM) are directly invested in hedge funds. This does not include cash and only concerns investments made directly by your organisation without engaging an external investment manager.

If your hedge fund investments are constrained in any way that limits your ability to apply a RI approach, you should explain this in the relevant free text indicators.

Contact the PRI if you require further clarification.

Background

The Hedge Funds module has been developed to provide a comprehensive and forward-looking set of indicators. In places, the indicators concern fairly advanced practices, including practices which the PRI expects will become more common as signatories make progress as responsible investors in this investment strategy.

Summary of updates

The module has not been changed between 2019 and 2020.

To view a detailed summary of the changes to the module, please click <u>here</u>.



Policy

HF 01	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle GENERAL
HF 01	INDICATOR		
	What is your rationale for adopting making process?	g a policy to incorporate RI into the in	vestment decision-
	Please select all options that appl	y to your organisation.	
	☐ To provide a framework and ESG applicability to security selections (the strategy) and decision making in Hedge Funds (e.g., breaking the strategy into different components and focusing on risk/return)		
HF 01.1	☐ To provide a framework for the fund governance structure		
	☐ Because ESG incorporation is perceived as a competitive advantage in the industry		
	☐ Growing momentum of sustainable investing in Hedge Funds in the financial community		
	☐ Other (specify)		
	O None of the above (we don't have a policy addressing RI incorporation into Hedge Funds)		
Additional information			
HF 01.2	[OPTIONAL]		

HF 01	EXPLANATORY NOTES	
	This indicator is applicable to all signatories. Adopting a responsible investment policy is covered at a high-level in the module Strategy and Governance within indicator SG 01. This indicator HF 01 refers specifically to your hedge fund investments and the main reasons your organisation considers when addressing RI in hedge funds.	
	For example, a responsible investment policy addressing hedge funds investments may include the following:	
	 A statement of the hedge fund managers to behave with the highest legal, ethical and professional standards. 	
HF 01	The managers will act as a responsible owner when holdings are made in an investee company.	
111 01	3. The managers will not borrow shares with the purpose of voting those shares	
	 The governance structure will be used to provide appropriate levels of oversight in the following activities: valuation, audit, risk management and conflict of interests. 	
	 Compliance will be supported at investee companies compliant with applicable local laws in the country invested. 	
	We will track the potential impacts of our activities on the markets and we will act consequently for the best interests of the community.	
	For further guidance on how to design and implement a responsible investment policy, please refers to the Strategy and Governance module SG 01 guidance.	

HF 01	DEFINITIONS	
Responsible Investment policy	A responsible investment policy refers to an overall statement that actualises the approach on how your organisation will achieve its identified mission in incorporating RI or ESG issues, and will build on your investment strategy, outline your investment objectives, and give guidance to investment processes as well as your standards for measuring success/performance.	
Fund governance	The fund governance relates to the work conducted by the governing body of an investment fund to ensure that the best interests of the fund and its investors are respected and in line with the regulation applicable in the jurisdiction where the fund is operated. When the fund is operated offshore, a company is generally set up and the governing body is the board of directors. This board of director will have full oversight and	
responsibility of the management of the fund.		
	A hedge fund strategy follows a specific risk/return objective and can be classified in distinct categories. Throughout this module, we will refer to the HFR classification to emphasize a specific strategy.	
	A given strategy includes generally the following elements:	
Hedge fund	- Market conditions: level of interest rates, volatility, etc.	
strategy	 One or several different financial instruments: equity, fixed income, derivatives, etc. 	
	- A sector: healthcare, utilities, etc.	
	- One method or more of asset selection: quantitative, fundamental approach, etc.	
	 Diversification approach: risk management, sector or regional diversification, etc. 	

	Indicator status	Purpose	Principle
HF 02	VOLUNTARY	DESCRPTIVE	4,5

HF 02	INDICATOR		
	To which normative codes and initiatives are you a signatory or voluntary adherent?		
	☐ AOI Hedge Funds Principles 2014		
	☐ Standard Board for Alternative Investments (SBAI)		
HF 02.1	☐ Alternative Investment Management Association (AIMA)		
111 02.1	☐ International Organisation of Securities Commissions (IOSCO)		
	☐ CFA's Asset Manager Code of Professional Conduct		
	☐ Other, specify		
	O None of the above		
	Additional information		
HF 02.2			

HF 02	EXPLANATORY NOTES
HF 02.1	This question is also covered on the SG module (SG 07) at a high level. For clarity purpose and in order to differentiate hedge funds investments from other categories of investments, HF 02.1 mainly lists on a non-exhaustive basis normative codes and initiatives that mainly pertain to the hedge funds industry but not exclusively.

HF 02	DEFINITIONS
AOI	Alignment Of Interests Association (AOI): a non-profit, investor-driven organisation focused on strengthening the alignment between hedge fund industry participants. Its mission is to foster investor collaboration, provide an independent forum for the exchange of ideas and contribute to the sharing of educational resources among investors.
Standards Board for Alternative Investments (SBAI)	Formerly known as the Hedge Fund Standards Board (HFSB), the SBAI is an international standard-setting body for the alternative investment industry, acting as a custodian of the Alternative Investment Standards designed to provide a framework of transparency, integrity and good governance for the hedge fund industry.
Alternative Investment Management Association (AIMA)	A professional association standing for the alternative investment industry with more than 1,900 corporate members in 60 countries. The AIIMA showcases leadership in industry initiatives such as advocacy, policy and regulatory management, educational programmes and sound practice guides. The association is also a co-founder of the Chartered Alternative Investment Analyst designation (CAIA).
International Organisation of Securities Commissions (IOSCO)	An association of organisations that is in charge of regulating almost 95% of the securities and futures markets in the world. Members include securities/futures market regulators such as a stock exchange or the Commodity Future Trading Commission (CFTC).
CFA's Asset Manager Code of Professional	As stated by the CFA Institute, "by adopting the Code, asset management firms signal their commitment to commonly held ethical principles and allow plan sponsors and other investors to easily identify which asset managers uphold the principles that resolve conflicts of interest in favour of investors."
Conduct	For further guidance and information on other initiatives/codes, please refer to the SG module.



SECTION

Governance

HF 03	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle GENERAL
HF 03	INDICATOR		
HF 03.1	Indicate whether and how your organisation has organised RI implementation and/or oversight responsibilities.		
	 □ We have dedicated internal staff with RI oversight responsibility for Hedge Funds. Please specify (CEO, CIO, PM, etc.) □ We have dedicated internal staff with RI implementation responsibility for Hedge Funds. Please specify (CEO, CIO, PM, etc.) 		
	 □ We use external consultants who have oversight and/or RI implementation responsibilities □ Other, specify ○ We do not have staff dedicated to RI oversight and implementation 		
HF 03.2	Additional information [OPTIONAL]		

HF 03	DEFINITIONS
Oversight responsibility	We refer specifically to roles for which the management or governance responsibility is in place so that the organisation effectively implements its policies and reaches its objectives and targets in relation to responsible investment performance.
responsibility	The role holders are accountable for embedding ESG consideration in investment processes.
Implementation responsibility	This responsibility covers individuals in charge of implementing specific aspects of the organisation's responsible investment practices. The implementation responsibility applies not only to dedicated staff but also to any other roles in the organisation
External	Here we refer to individuals/organisations who have been legally mandated to take any of the two categories of responsibilities above.
consultants	These external consultants can be used as a substitute to or in conjunction with internal staff.
	For further guidance, please refer organisational-level notes in SG module (SG 07)



HF 04	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle GENERAL
HF 04	INDICATOR		
	Please indicate whether you implemented any RI training programmes regarding hedge fund investments for your staff during the reporting year.		
	☐ Yes, we have a formal RI training/educational programme covering hedge funds		
HF 04.1	☐ Yes, we have a RI training programme to educate staff regarding our hedge fund policies		
	☐ Yes, we regularly train our staff on code of ethics/compliance manuals covering hedge fund investments		

If yes, please explain how the RI training programme is conducted?

HF 04	DEFINITIONS
Responsible	Educating the organisation staff about Responsible Investment on a regular basis should be perceived as a key target in order to stay abreast with the development in the industry. The format of the training can be either formal or informal.
Investment training program	Formal training stands for attendance to courses offered by universities or relevant certifications.
	Informal training relates to attendance at conferences or mentoring schemes.
Hedge Funds	A Hedge Fund policy is generally a written document outlining the purpose of the fund, the division of responsibilities (the composition of the Board, Investment Committee), the strategies followed, the asset allocation, the return objectives, the limitations in place and any other information relevant to the trustees such as potential conflict of interests or restrictions on any particular investments.
policies	A Hedge Fund policy is different from a Responsible Investment (RI) policy, the latter specifying how ESG considerations are incorporated in investment decisions.
	For further information about a RI policy, what it entails and how it should be designed, please refer to the module SG (indicator SG 01) and the PRI website here.
Code of Ethics/Compliance	A bespoke guide of principles designed to help professionals to conduct business honestly and with integrity. It generally includes behavioural rules applicable to the organisation along with sanctions and penalties in case of violations.
manuals	Because the financial industry involves increasingly tougher regulation, several leading organisations such as the CFA institute or the FCA in the UK developed their own code of ethics widely accepted and recognised as paragons in the industry.



☐ Other, specify_

HF 04.2

O No, we don't have a RI training programme

HF 05	INDICATOR			
	In incorporating RI into Hedge Funds, what are the main consideration(s) influencing your organisation? Please select the options that apply to your organisation.			
HF 05.1	□ To achieve a robust governance structure for our Hedge Fund investments □ To attain relevant/existing ESG data □ To clearly identify/manage the ESG opportunities associated with each strategy □ To clearly identify each strategy and the associated financial risks □ Other, specify ○ None of the above			
	Do the annual employee(s) performance reviews or remuneration metrics reflect any component of the KPI used for the incorporation of RI into Hedge Funds?			
	O Yes	○ No		O No
	If yes, please select and describe the KPIs that are used in your organisation (at least one KPI should be linked to variable pay).			
HF 05.2	KPI	Variable pay	linked	Explanation
HF 03.2	☐ Risk management	O Yes O No		
	☐ Financial performance	O Yes O No		
	☐ Other (specify)	O Yes O No		
	If you responded "No" in HF 05.2, please explain the reasons.			
HF 05.3				

HF 05	EXPLANATORY NOTES
	RI considerations
	This indicator asks specifically about the most essential reasons your organisation follows to implement responsible investment into hedge funds, set up KPIs and link these KPI to any variable pay.
	Example of such reasons could be:
HF 05	Establishing a strong governance structure: identifying key managers, roles, etc.
	Identify strategies and manage ESG opportunities: each strategy is different in terms of risks/returns and ESG opportunities. Being able to identify the strategies followed could provide a clearer direction towards specific ESG opportunities.
	Attain relevant data: using existing ESG data could be perceived as a strong incentive to integrate RI into Hedge Funds and to foster competition on the market.



KPI and variable pay

The sub-indicator HF 05.2 is designed to assess whether your organisation incentivises the staff in charge to reach specific responsible investment KPI through a variable pay scheme (bonus, share-option schemes, etc.).

Risk management

Risk management is the process resulting from an investment decision and follows different steps: identification of the risks, analysis, and acceptance or mitigation of these risks.

Assessing these risks generally involves defining or following key statistical metrics such as the Tracking-error (hedge funds or ETF) or the Value at Risk to name few but not necessarily. Recent developments in behavioural finance show that investors tend to grant higher attention to metrics other than numerical such as a herd behaviour or anchoring (investing in a specific product perceive to be better).

Within the framework of this indicator and the module overall, the PRI do not promote any specific approach of risk management but rather the signatory should be able to identify and report on these risks.

Financial performance

Financial performance, also known as financial return, is the amount lost (negative return) or realised (positive return) on an investment.

The simplest measure of the financial performance of an investment is the variation rate (expressed in percentages) across 2 periods.

Other measures of this kind include ratios such as the Return on Equity (ROE), Return on Assets (ROA) or the Price-Earnings ratio (P/E ratio).

Financial performance can also be expressed in nominal value, in such case it merely reflects all changes in value that occurred over a stated period of time.

The NAV (net asset value) of the fund used as a measure of the fund's performance.

LOGIC	
HF 05	Sub-indicator HF 05.2 will be applicable if "Yes" is selected.



SECTION

Investment process

	Indicator status	Purpose	Principle
HF 06	MANDATORY	DESCRIPTIVE	GENERAL
HF 06	INDICATOR		
	Please describe the ESG resources and process.	tools used in your investment	decision-making
	Category of ESG	Reason for use	
	☐ ESG data (proprietary, 3 rd party, etc.)		
HF 06.1	☐ ESG research (broker, etc.)		
	□ Consultants		
	☐ Other resources/tools/practices		
	Select and explain how these resources are incorporated into the investmanagement process?		tment and risk
HF 06.2	Category of ESG	Investment/risk management process	Additional text [OPTIONAL]
	ESG data (proprietary, 3 rd party, etc.)	☐ Investment origination ☐ Investment analysis ☐ Portfolio construction ☐ Trade management	
	ESG research (broker, etc.)	☐ Risk management Same as above	
	Consultants	Same as above	

Same as above



Other resources/tools/practices

HF 06	EXPLANATORY NOTES
	ESG resources
HF 06.1	Identifying and relying on key ESG resources is perceived as an important step in any pre-investment process.
	We identified here 4 broad categories of ESG resources that could be used as an essential source of information to incorporate responsible investment into Hedge Funds.
	How the resources are used
HF 06.2	ESG resources can be used at different levels of the investment process: origination, analysis, portfolio construction, trade management or monitoring risks.
	Any hedge fund manager should be able to identify one or several steps of the investment process in which ESG factors have been incorporated.
LOGIC	
HF 06.2	The selection options within HF 06.2 are applicable only if they have been selected in HF 06.1.



	Indicator status	Purpose	Principle
HF 07	MANDATORY	DESCRIPTIVE	1,2

HF 07	INDICATOR			
HF 07.1	If your organisation uses quantitative analysis , please indicate at which level ESG is incorporated into this analysis.			
	Quantitative modelling	ESG incorporation	Outcomes and assessment/review	
	 □ Multi-factors models □ Fractal Market Hypothesis (FMH) modelling □ Models Yield □ Technical analysis (Fibonacci retracements, Bollinger bands, etc.) □ Univariate models (Box-Jenkins) □ Monte-Carlo simulations □ Multiple regression analysis □ Correlation analysis □ Other, specify 	□ Pre-defined ESG parameters are added to our quantitative models. □ We conduct scenario analysis to define ESG parameters separately. □ Variance/Value at Risk analysis with embedded ESG risks. □ Other, specify		
	O We don't use quantitative an	alysis		
	If your organisation uses fundamental analysis , please indicate at which level ESG is incorporated into this analysis.			
	Fundamental approach	ESG incorporation	Outcomes and assessment/review	
HF 07.2	☐ Top-down ☐ Bottom-up	☐ At a micro level – ESG factors are integrated into financial models (DCF, multiples, etc.) ☐ Financial ratios with embedded ESG factors. ☐ At a macro level – ESG factors are embedded with economic indicators (GDP, inflation, etc.) ☐ Other, specify ()		
	○ We don't use fundamental analysis			
HF 07.3	Additional information [OPTIONAL]			



HF 07	EXPLANATORY NOTES
	Quantitative analysis
	Different quantitative approaches can be used alone or in conjunction to incorporate ESG factors. A non-restricted list of such approaches is disclosed below
	Multi factor models
	A financial model using multiple factors to explain prices of a security/portfolio of securities. Well-known models include the CAPM and the Fama-French Three Factor Model.
	Fractal Market Hypothesis (FMH)
	FMH-based models explain market prices using the concept of fractals. Prices are viewed as geometric shapes broken down in smaller parts replicating the shape on the whole. Investors using fractal models generally admit that prices are not log-normally distributed as in other models such as the multi-factor ones.
	Model yields
	These models are used to determine the yield of a specific security (such as fixed-income or stocks) or a fund. The yield of an investment is positively correlated to the level of its risk but negatively correlated to the price: the higher the risk, the higher the yield and the lower the price.
	Technical analysis
HF 07.1	Originally developed and used by traders, this category of analysis evaluates investments by analysing statistical trends such as price movements or volumes. Prices are assumed not to be randomly distributed and follow indeed specific patterns. A discipline on itself, technical analysis involves many statistical tools such as Bollinger Bands, Fibonacci retracements, Elliott Waves, etc.
	Monte-Carlo simulations
	A probability simulation that project possible prices trajectories by evaluating the associated risks for a given investment. Contrary to other quantitative closed-form solution models (such as those derived from the Black & Scholes model), Monte-Carlo simulations provide a range of possible trajectories.
	Univariate models
	These models are generally used to forecast data such as prices from a specified time series, they involve generally 1 variable. The Box-Jenkins model is one of the most well-known forecasting model using autoregression, moving averages and seasonal differencing.
	Value at Risk (VaR)
	A statistic measure of the level of financial risk within a firm, portfolio or a position. It determines
	the potential losses, the probability of occurrence for the amount of loss and a specific time frame.
	Fundamental analysis
	Fundamental analysis is an investment approach of evaluating a security in order to assess its intrinsic value by taking into account quantitative and qualitative factors. This approach is divided into two main and opposite approaches, bottom-up and top-down.
HF 07.2	Bottom-up
HF UI.Z	This investment approach focusses on the analysis of individual securities (and to such extent on underlying companies) with lesser importance granted to macroeconomic factors.
	Top-down
	In this approach, the investor prioritises macroeconomic factors over the microeconomic ones.



	Indicator status	Purpose	Principle
HF 08	MANDATORY	DESCRIPTIVE	1,6

HF 08	INDICATOR		
HF 08.1	Please indicate whether there have been any changes to your RI incorporation process over the past 12 months (e.g., additional resources, information sources)?		
	O Yes	O No	
HF 08.2	If yes, please describe them.		
111 00.2			
HF 08.3	If not, please explain why.		
111 00.0			

HF 08	EXPLANATORY NOTES	
	RI incorporation process	
	This indicator measures your progress or changes in the incorporation of ESG factors in your investment process according to the different RI methodologies.	
	Specifically, you can report whether some initial RI decisions have been changed or not and what these changes entail.	
	A couple of typical examples are listed below:	
HF 08	You may developed a RI policy but you haven't adopted or implemented	
	You have developed a new product under ESG considerations	
	You might have relied on a specific ESG data provider and decided in the course of the year to change for another one.	
	Your organisation decided to modify how ESG risks are assessed and monitored: for example, setting up new KPI or integrating new constraints.	
	Your investment decisions overall gradually incorporated new approaches: for instance, your organisation might have regularly followed a fundamental approach and decided to supplement/integrate quantitative analysis.	
LOGIC		
HF 08	[HF 08.2] and [HF 08.3] are applicable depending on the selection in [HF 08.1].	



	Indicator status	Purpose	Principle
HF 09	MANDATORY	DESCRIPTIVE	1,2

HF 09	INDICATOR	
	Please select and explain how active ownership practices are integrated into investment decisions.	
	☐ (Proxy) Voting	
HF 09	□ Engagement	
	□ Shareholder resolutions	
	O None of the above	
	○ Not applicable (N/A)	

HF 09	EXPLANATORY NOTES	
	Active Ownership practices	
	Active ownership is a post investment methodology; and it's a function of the holding period of the security.	
HF 09	Asset owners or fiduciaries use their shareholder rights (or other legal or contractual rights) to influence companies (or other invested entities) to improve the ESG-risk management of companies or stimulate more sustainable business practises, products and services. Shareholder rights include voting rights, individual or collaborative engagement and (if necessary) litigation. ESG-issues can be incorporated in voting policies and voting decisions. Engagement can be done individually and /or collaboratively to try to influence companies (and other invest entities) to improve their ESG-performance or sustainability.	
	For some hedge funds strategies, active ownership is not applicable as a result of the holding period of the security.	



	Indicator status	Purpose	Principle
HF 10	MANDATORY	DESCRIPTIVE	1,2

HF 10	INDICATOR					
HF 10.1	Please provide examples of ESG risks and opportunities being incorporated into your investment decisions over the past 12 months.					
	Hedge Fund strategy	ESG factors	ESG risks / opportunities	Financial risks	Scope and process	Outcomes
	[drop down -several selections] Global macro Equity hedge Event driven Relative value Risk parity Blockchain Fund of Hedge Funds	[drop down – 1 selection per example] □ Environmental □ Social □ Governance				
	[same as above]	[same as above]				
	[same as above]	[same as above]				
	[same as above]	[same as above]				
	[same as above]	[same as above]				
O We are not able to provide examples						

	Based on your example(s) provided above, please specify whether the incorporation of ESG factors affected the risk-adjusted returns of your Hedge Funds.
	O The incorporation of ESG risks <u>positively</u> affected the risk-adjusted returns of our Hedge Funds
HF 10.2	O The incorporation of ESG risks <u>negatively</u> affected the risk-adjusted returns of our Hedge Funds
	O The incorporation of ESG risks had an overall neutral effect on the risk adjusted returns of the hedge funds
	O No impact or we do not track this information.

HF 10	EXPLANATORY NOTES	
	Identification of ESG risks and opportunities	
	In this sub-indicator, you can report for one 1 or several strategies which E, S or G factor you identified, what were the ESG risks and/or opportunities and the outcomes of your investment decisions.	
	A valid example would have for a given E,S or G factor all columns filled.	
	Financial risks	
	The risks associated with any investment in a company or security associated to the company.	
HF 10.1	Key risks would include credit risk, liquidity risk, currency risk, equity risks.	
	Scope and process	
	This section would provide room for the following questions:	
	What is the chosen investment approach (fundamental, quantitative, etc.) of the managers?	
	How the risks are monitored and/or mitigated?	
	Outcomes	
	This section would for instance address the following concerns:	
	What were the results of the investment process, any opportunity or hindrances encountered? How these have been addressed? Have they been communicated to key stakeholders?	
	Risk-adjusted return	
	A measure determining an investment's return by assessing the level of risk involved in producing that level of return.	
	Most common measures used in the industry are: Alpha, Beta, Standard deviation, Treynor ratio.	
	Neutral impact (or risk neutral)	
HF 10.2	Risk neutral defines an investor approach indifferent to the level of potential risk generated by an investment. In such configuration, the risks can be higher than expected but eventually ignored to focus on the potential additional gains.	
	This definition <u>excludes</u> de facto a "no impact" situation in which ESG risks have not affected the risk-adjusted returns of the funds.	
	"No impact or we do not track this information"	
	Your organisation can select this choice to indicate one of the following 3 situations:	
	This information is not monitored,	
	This information is known but for particular reason your organisation refuses to reveal it, or	
	This information is known but there isn't any impact.	





HF 11	INDICATOR			
HF 11.1	Do you use derivatives instruments as part of your Hedge Fund strategies and/or Funds of Hedge Funds?			
	O Yes	○ No		
	Please select all the applicable categories of derivatives used.			
	Listed/OTC	Category of derivatives		
	O Listed derivatives	□ Futures□ Options (Equity, Index, ETF, FX, IR, etc.)□ Other (please specify)○ None of the above		
HF 11.2	○ OTC derivatives	□ Swaps □ FRA □ Exotic derivatives □ CDS □ Other (please specify) ○ None of the above		
	Please explain whether and how these derivatives impacted the risk-adjusted returns of your Hedge Fund investments?			
	Impact	Outcomes		
	O Positive impact			
HF 11.3	O Negative impact			
	O Neutral impact			
	O No impact or we do not track this information			
HF 11.4	Please indicate whether the use of derivative level?	es triggered ESG risks/opportunities at the fund		
NF 11.4	○ Yes	O No, or undetermined		
HF 11.5	Additional information [OPTIONAL]			



HF 11	DEFINITIONS
Derivatives	A financial security between two or more parties and whose the value derives from an underlying asset or basket of assets.
	Also known as exchange traded derivatives, these financial instruments are traded on regulated derivatives exchanges or other exchanges such as CME or Eurex.
	Most common derivatives products traded on these markets are <i>futures</i> and <i>listed options</i> .
	Futures
Listed derivatives	A financial contract obliging the investor to buy or sell an asset on a future date at a specified price.
	Options
	A financial contract giving the investor the right <u>but not the obligation</u> to buy (a call option) or sell (a put option) an asset.
	These financial instruments are directly and privately traded between two parties without going to an exchange.
	Most common OTC derivatives contracts are swaps, Forward Rate Agreements (FRA) and exotic derivatives.
	Swap
Over-the-Counter (OTC) derivatives	A financial contract to exchange cash on/before a specified future date based on the underlying value of exchange rates, interest rates, equity or other assets.
(OTC) derivatives	Forward Rate Agreements (FRA)
	Similar to futures contract, a forward is a bespoke financial contract between two parties engaged in buying or selling an asset on a future date at a specified price.
	Exotic derivatives
	Contrary to traditional derivatives, these financial products involve much more complexity in calculating the payoff and the price. Typical instruments of this kind would encompass swaptions, exotic options and other specific contracts such as weather derivatives.
Neutral impact	Also defined as "risk neutral", this is an investor approach indifferent to the level of potential risk generated by an investment. In such configuration, the risks can be higher than expected but eventually ignored to focus on the potential additional gains.
nodii di Impaot	This definition <u>excludes</u> de facto a "no impact" situation in which ESG risks have not affected the risk-adjusted returns of the funds.
	Your organisation can select this choice to indicate the following 3 situations:
No impact or we do not track this	This information is <u>not monitored</u> ,
information	This information is known but for particular reason your organisation cannot reveal it, or
	This information is known but there the impact is null.
Derivatives and ESG risk/opportunities	Your organisation is provided with the opportunity to report whether derivatives instruments triggered ESG risks and/or ESG opportunities.



	In other words, would your organisation track the ESG impact of derivatives at the fund level and is able to identify and measure that impact.
No/undetermined Please select this choice if your organisation: Does not track this information, or Is unable to determine this information	
LOGIC	
HF 11	Sub-indicators HF 11.2, 11.3, 11.4 and 11.5 will be available if " yes " is selected in HF 11.1.



SECTION

Monitoring and reporting

HF 12	Indicator status MANDATORY	Purpose DESCRIPTIVE	Principle 1,2

HF 12	INDICATOR			
HF 12.1	Please indicate whether you report separately on your funds' long/short/net exposures?			
	O Yes		O No or Not applicable , please explain	
HF 12.2	Please explain your reporting p	roces	S.	
	Exposure	ESG data/reporting process		KPI and assessment
	☐ Long exposure			
	☐ Short exposure			
	☐ Net exposure			
	Additional information			
HF 12.3	[OPTIONAL]			

HF 12	EXPLANATORY NOTES	
HF 12.2	For each category of exposures, your organisation is invited to indicate how the reporting process is conducted, which KPI is set or used and how this approach is assessed overall	
LOGIC		
HF 12	HF 12.2 and HF 12.3 will not be applicable if L/S is not used as a strategy, OR if the reporting cannot be differentiated in terms of exposures.	

HF 12	DEFINITIONS	
	A measure expressed in percentage of the difference between long and short exposures. At the fund level, three situations can be identified:	
Net exposure	Long exposures exceed short exposure: net long exposure.	
	Short exposures exceed long exposures: net short exposure.	
	Long and short exposures are equals: market neutral (net exposure is 0).	
Not applicable	Please select this choice if Long or Short exposures are not used in your strategies or you are not conducting any differentiation between the two exposures.	

HF 13	INDICATOR						
	Please describe what metrics/initiatives (internal and/or external) your organisation uses to measure its progress in incorporating RI into the investment process.						
	Hedge Fund strategy	Metrics/Initiatives	Internal/ext ernal	Metrics/ Initiatives definition	Assessment/ outcomes		
HF 13.1	[drop down - one selection] Global macro Equity hedge Event driven Relative value Fund of Hedge Funds Risk parity Blockchain	[drop down - several selections] Metrics RI policy implementation RI Recommendation changes ESG Alpha ESG Beta GHG emissions Initiatives Transparency Integration of ESG data Education Other (specify)	[drop down] O Internal O External				
	[same as above]	[same as above]	[same as above]				
	[same as above]	[same as above]	[same as above]				
	[same as above]	[same as above]	[same as above]				
	[same as above]	[same as above]	[same as above]				
	O We are not able to provide examples.						
HF 13.2	Additional information [OPTIONAL]						

HF 13	DEFINITIONS
ESG Alpha	This metric refers to excess return of an investment relative to the return of a benchmark index when ESG factors are incorporated into the investment process as a source of return
ESG Beta	This metric refers to the volatility of an asset or portfolio in relation to the overall market when ESG factors are incorporated into the investment process as a source of risk.



HF 14	INDICATOR				
HF 14.1	Does your organisation assess its funds' exposure to climate-related risks, and does it measure and monitor the carbon footprint of its investment portfolio?				
	O Ye		O No		
	If yes, explain the metho	dology used and the	assessment pr	ocess.	
	Hedge Fund Strategy	KPI		Methodology	Assessment
	[drop down -one selection]	[drop down - sever	al selections]		
HF 14.2	☐ Global macro ☐ Equity hedge ☐ Event driven ☐ Relative value ☐ Funds of Hedge Funds ☐ Risk parity	☐ Climate-related to ☐ Weighted average intensity ☐ Carbon footprint and 2) ☐ Portfolio carbon ☐ Total carbon em ☐ Carbon intensity	ge carbon (scope 1 footprint		
	□ Blockchain □ Exposure assets □ Other emis		oon-related		
	[same as above]	[same as above]			
	[same as above]	[same as above]			
	[same as above]	[same as above]			
	[same as above] [same as above]				
UE 44.2	If your answer is "No" in HF 14.1, please explain why.				
HF 14.3					



HF 14	EXPLANATORY NOTES
	Climate risks
HF 14.1	Here we refer to all risks resulting from the climate change and affect natural and human systems.
	Climate change presents both risks and opportunities. This indicator covers how climate change impacts your investment decision making, active ownership practices and if relevant, engagement with fund managers, as well as engagement with governments to encourage a climate-supportive policy environment for investors.
	Your organisation is invited to report whether climate-related risks, when applicable, are taken into account in the hedge fund strategy followed.
	For each applicable strategy, please identify whether you incorporated one or several KPIs as listed, the methodology followed and the assessment in place.
	A valid example would include all of the elements above.
	Activities to measure and reduce your organisation's own carbon footprint should not be captured here, unless they are undertaken for buildings that you occupy and report on as part of a directly managed property portfolio.
	Weighted Average Carbon Intensity
HF 14.2	Portfolio's exposure to carbon-intensive companies, expressed in tons CO2e / \$M revenue. Metric recommended by the FSB Task Force.
	Carbon Intensity
	Volume of carbon emissions per million dollars of revenue (carbon efficiency of a portfolio), expressed in tons CO2e / \$M revenue.
	Total Carbon Emissions
	The absolute greenhouse gas emissions associated with a portfolio, expressed in tons CO2e.
	Carbon Footprint
	Total carbon emissions for a portfolio normalized by the market value of the portfolio, expressed in tons CO2e / \$M invested.
	Further information and guidance on this topic are available in the SG module (SG 14) and the Climate Change reporting.
LOGIC	
HF 14	If "No" is selected in HF 14.1, HF 14.2 is not applicable.



HF 15	INDICATOR				
HF 15.1	How often and in what format (e.g., meetings, written reports) does your organisation report to its investors on ESG risk assessments? Please provide reporting examples.				
	Frequency of reporting	Format	ESG activities	Portfolio ESG risk assessment	Outcomes
	[drop down - one selection]	[drop down - several selections]	[drop down - several selections]	[drop down - several selections]	
	O Annually O More frequently than annually O Other	☐ Minutes of meetings ☐ Written reports ☐ Side letters/emails ☐ Other (specify)	□ Environmental□ Social□ Governance	☐ Fund governance ☐ Linear constraints ☐ Quadratic constraints ☐ Other (specify)	
	[same as above]	[same as above]	[same as above]	[same as above]	
	[same as above]	[same as above]	[same as above]	[same as above]	
	[same as above]	[same as above]	[same as above]	[same as above]	
	[same as above]	[same as above]	[same as above]	[same as above]	
	O We are not	able to provide ex	amples.		
HF 15.2	Additional info	rmation			



HF 15	EXPLANATORY NOTES	
	A sound reporting on ESG risks assessments to investors is not only considered good practice but also demonstrates a resilient governance.	
	A valid reporting example would include at least one element for each column in a given row.	
	Linear constraints	
HF 15.1	Assessing the level of ESG risks might be evaluated through a linear optimization: the objective function (e.g. minimising the level of ESG risk) is subject to constraint functions that are linear .	
	Quadratic constraints	
	Assessing the level of ESG risks could involve quadratic optimization: the objective function (e.g. minimising the level of risk) is subject to constraint functions that are quadratic.	
LOGIC		
HF 15	HF 15.2 is applicable irrespective of whether your organisation provides examples in HF 15.1 or not.	

