

PRI Reporting and Assessment survey 2011
Responses for ALL questions - not for publication

Your organisation:

Ilmarinen Mutual Pension Insurance Company

Organisational overview

This section determines which questions in the survey are relevant to your organisation. Your organisation's characteristics also play a role in determining your peer group for benchmarking. Therefore, please ensure you provide accurate answers.

You will be provided with an *Other* category in some questions, but please only use this option if the alternatives listed do not represent you in any way, as this may prevent you from having results comparable with peers.

You will not be able to continue the online survey until you have completed fully both this section and the 'Governance, policy and strategy' section. However, you can prepare your answers for the following sections by reviewing the full list of questions and explanatory notes on the [PRI extranet](#).

This section may require you to collect information from multiple sources. We strongly recommend you begin collecting this information as soon as possible and before commencing the survey.

This section of the survey is not scored.

Q 1 Please provide the name and email address for your primary and secondary PRI Reporting and Assessment contacts.

Primary contact

name: Anna Hyske

e-mail: anna.hyske@ilmarinen.fi

Secondary contact (optional)

name:

e-mail:

Q 2 What category best describes your organisation?

Please select **one category** which best represents your **primary activity**.

Asset owners (AOs)
Insurance company

Q 6 Please indicate the number of staff your organisation employs and select the level of complexity that best describes your organisation?

Approximate number of staff: 70

Level of complexity of organisation: Simple

Q 7 What were your organisation's total assets under management as of 31 December 2010, including the assets of all your consolidated subsidiaries?

	billions	millions	thousands	units
Total AUM:	28	121	700	000
Currency:	Euro (EUR)			

Date of assets under management figure

	year	month	day
Date:	2010	December	31

The amount you indicated above is roughly equal to the amount calculated below in United States Dollars. Please confirm that this figure is approximately correct before proceeding. Exchange rates are from the International Monetary Fund.

Source: [IMF Exchange Rate archive, December 2010](#)

	billions	millions	thousands	units
Total AUM in USD:	37	345	654	467

**Q 10 What percentage of your externally managed assets are managed by PRI signatories?
(+/- 5% is sufficient)**

Percentage: 65 %

Governance, policy and strategy

This section is focused on the governance, policies and strategies guiding your organisation's approach to responsible investment (RI). 'Policy' in this section may refer to one overall RI policy or multiple policies that address various elements of RI or ESG issues. Some questions in this section are scored, while other questions are not scored but do determine the applicability of subsequent questions.

Please make sure you provide accurate answers. You will not be able to enter this section unless you have completed the "Organisational overview" section. **You will not be able to continue the survey until you have finalised this section.** However, if you wish to begin preparing your answers for the following sections, you may do so by reviewing the full list of questions and explanatory notes in the manual provided on the [PRI extranet](#). This section will be scored separately from the six Principles.

Q 11 Please provide a description of how your governance, policies and strategies address RI and ESG issues.

Note that this text - in addition to being part of the full survey - will also be part of the *Executive Summary* of the survey. The *Executive Summary* is a separate document that will collate the text you provide for each of the introductory sections of the survey (GPS and the six Principles).

In order to achieve the objectives set for investment activities, Ilmarinen invests its pension fund assets in equity, real estate and interest-bearing instruments, as well as investment loans. Ilmarinen is a relatively large player in the financial market. Our investments are long-term in nature. We aim to maximise long-term ownership value. This means that the companies we invest in must be managed for the long-term benefit. Companies that operate in this way usually give due consideration to other stakeholders, such as employees, subcontractors, lenders and customers. In addition, the company must operate in a responsible and socially acceptable manner and is committed to sustainable development with respect to the environment.

Ilmarinen expects these companies to also strive towards transparency. Comprehensive reporting on company activities is the most important transparency indicator. The reported information includes, for example, the independence of the members of the Board of Directors, incentive plans, accounting principles and information on major shareholders, as well as environmental and social responsibility reporting.

Ilmarinen exercises its ownership rights in the following ways:

- By participating in the Annual General Meetings
- By maintaining active contact with the management of the companies in which it invests
- By cooperating with other shareholders
- By participating in the work of the Nomination Committee

For example, it is important to Ilmarinen that:

- The shareholders receive information on all the topics that will be addressed at the Annual General Meeting well in advance
- Any extraordinary motions will be explained in detail in the notice of meeting
- The executive and non-executive directors' remuneration and pension plan principles will be presented to shareholders .

In addition to complying with current legislation and regulations, Ilmarinen and its investment activities must also be socially acceptable. To Ilmarinen, social acceptability means compliance with international norms and agreements. Ilmarinen requires that in addition to domestic legislation, companies comply, for example, with the following norms and agreements:

- UN Global Compact
- e.g. respect for human rights, including equal treatment regardless of race, religion, social origin or gender
- ILO Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises
- guidelines on, for example, rules for working life, sustainable development, issues concerning the responsibility of financiers of investment projects, and environmental issues
- UN Declaration of the Rights of the Child

Ilmarinen evaluates social acceptability using the principle of positive valuation, which means that as a starting point the investment targets are assumed to respect the abovementioned agreements and norms so that, for example, no company or industry is automatically excluded as a potential investment target. To Ilmarinen, negative values are represented by indifference towards the abovementioned norms and agreements. If a company included in Ilmarinen's investment portfolio is found to have operated in violation of Ilmarinen's principles for responsible investment, Ilmarinen, through its own actions, will attempt to influence the company so that the undesirable operations cease. If the measures do not result in the desired outcome or their success is highly uncertain, the company in question is removed from Ilmarinen's investment universe.

Q 12 Do you have a policy or a set of policies that make specific reference to responsible investment, and if so, do they cover environmental, social, and governance issues?

Please select "Yes" or "No": Yes

If "Yes", which issue(s) does it cover? Environmental
Social
Governance

Q 13 For the following asset classes, to what extent has your policy or approach to responsible investment been incorporated into internal management processes (e.g. business planning, strategic planning, or similar)?

Extent that your approach has been incorporated into internal management processes

Please select:

"Large", "Moderate", "Small" or "Not at all"

Asset class

Listed equity (developed markets)	Large
Listed equity (emerging markets)	Moderate
Fixed income - sovereign and other non-corporate issuers	Large
Fixed income - corporate issuers	Large
Private equity	Moderate
Non-listed real estate or property	Moderate
Hedge funds	Moderate

Q 14 Within your organisation:

- What roles are present?
- Who has a clear responsibility related to responsible investment implementation? and
- Are there incentives and/or training on RI/ESG issues?

	Roles present in your organisation	Responsibilities on RI/ESG	Incentives	Training
	Please check all that apply		Please choose among "Yes, for all", "Yes, for some" or "No"	
Board of trustees or board of directors and their committees	Yes	Yes	N/A	Yes, for all
Chief Executive Officer or Chief Investment Officer or equivalent	Yes	Yes	No	Yes, for all
Other senior management	Yes	Yes	No	Yes, for all
Portfolio managers	Yes	Yes	No	Yes, for all
Analysts				
Researchers				
RI or ESG specialist	Yes	Yes	Yes, for all	Yes, for all
Other - please specify:				

Q 15 Select any of the following RI, ESG and/or SRI approaches that you or your external investment managers currently apply in the investment decision making process.

Please note that this question helps determine which questions you will be asked in subsequent sections, so please carefully review the definition of each possible answer.

Please select all those that are relevant
(columns are visible based on your answer
to Q8 on asset classes breakdown)

	Internally managed	Externally managed
Exclusion based on ethical criteria		
Screening as a way to avoid the potential negative publicity surrounding the companies/sectors in question as it may adversely reflect on you or your manager's brand/license to operate	✓	
Screening based on a belief that exclusion or inclusion of certain investments from your investment universe can have a material effect on portfolio performance	✓	✓
ESG analysis within individual investment decisions, possibly including these factors into valuation and investment performance models	✓	✓
Themed investing		✓
None of the above (this reply excludes any of the above)		

Q 16 Please indicate which of the following thematic investment strategies your organisation employs?

Please select all that apply

Cleantech	✓
Microfinance	
Sustainable forestry	✓
Global health	✓
Water	✓
Other (1) - please specify: Demographics	✓
Other (2) - please specify:	
Other (3) - please specify:	
Other (4) - please specify:	
Other (5) - please specify:	

Q 17 Please select any of the following active ownership activities that you, your external service providers or your external investment managers have undertaken in 2010 on behalf of your organisation?

Please note that this question helps determine which questions you will be asked in subsequent sections, so please carefully review the definition of each possible answer.

You may select any approach you or your external managers, service providers or partner entities adopt on your behalf

(Proxy) voting related to listed equity investments in the following asset classes: Listed equity (developed markets), listed equity (emerging markets), or listed real estate/property (including the votes on listed securities held in hedge funds).



File and/or co-file shareholder resolutions on listed companies.



Engagement on ESG issues with listed equity or fixed income issuers in the following asset classes: listed equity (developed markets), listed equity (emerging markets), listed real estate/property, listed securities held in hedge funds, or fixed income - corporate issuers.



Ownership and engagement activities focused on ESG issues related to investments in the following asset classes: Listed equities which permit a significant control, sovereign and other non-corporate fixed income, private equity, non listed real estate/property, hedge funds, infrastructure, or other.



None of the above (this reply excludes any of the above).

Q 18 Please add any overall comments and clarifications related to governance, policy and strategy here.

Our RI policy describes the minimum all companies should be able to achieve and if a company is unable to achieve this then as an investor one should ask: 'Are we willing to accept this situation? If the answer is yes, are we prepared for the consequences (eg. negligence on human rights and the environment, distorted competition, financial risks, immaterial rights' risks, image risks.....). We are not prepared for that and hence we have the policy for restricting investments in companies unable to adhere these norms. A company failing to pass our expectations may prove to be an absolute star during one year but we are confident that willingness to 'sacrifice' POTENTIAL one year's extra returns for the benefit of long term value creation is worthwhile even if we don't have extensive research to back our beliefs. There are examples that on single names this might be true but on the portfolio level, we are not yet convinced on the studies. And therefore we haven't put a lot of resources into assessing the link.

Principle 1 - We will incorporate ESG issues into investment analysis and decision-making processes.

This section focuses on the integration of ESG considerations into the investment process. The questions are split into three sections. Only questions relevant to your organisation will be displayed, based on your responses to Q 8 (your investment management structure and asset class breakdown).

The three sections are:

- I. Internally and actively managed investments;
- II. Externally and actively managed investments; and
- III. Passively (both internally and externally) managed investments.

Some questions in this section are scored. Any question that is scored, but is not relevant to your organisation, based on your investment management structure and asset class breakdown or other responses, will not affect your overall score for Principle 1.

You do not need to complete Principle 1 questions before completing questions for other Principles. While completing this section you are free to navigate to any of the other sections of the survey without losing answers already completed.

Definitions

Please note that this section of the survey focuses on investment decision-making processes and how ESG issues are integrated in these processes. It does not address the integration of ESG issues in other parts of your organisation and/or activities, such as the running of offices (e.g. how you manage your own organisation's waste) or your organisation's collaboration with other investors on ESG issues.

ESG Integration, as addressed in this section of the survey, relates to the consideration of ESG issues alongside traditional financial measures, based on the belief that ESG issues can affect the performance (risk and/or return) of investment portfolios (to varying degrees across companies, sectors, regions, and asset classes and through time).

Integration is considered to be:

- screening based on the belief that exclusion or inclusion of certain investments in the investable universe can effect materially on the portfolio's financial performance; and/or
- ESG analysis within individual investment decisions based on the belief that such analysis can effect materially on the investment's financial performance.

Please note the view that ESG issues can influence investment returns based either on:

1. The premise that performance on these issues will eventually be reflected in financial and operational outcomes and that externalised costs in the future will be priced and have an impact on revenue growth, margins, etc.; or,
2. The premise that the way in which the market rates or prices the stock will be affected even in the absence of an impact on financial or operational performance.

Exclusion of stocks or sectors from portfolios or down-weighting them based on the possibility that an association with the stocks may adversely affect the owners profile or brand amongst stakeholders is **not** regarded as integration. Also, exclusion based on ethical considerations of sectors is not considered ESG integration. However, screening based on norms that are believed to be material in the investment process are included in the above definition of integration.

Q 19 Please provide a description of your organisation's approach to this Principle. For example, how do your organisation's investment analysis and decision-making processes incorporate ESG issues?

If your assets are managed both internally and externally, please describe how you address this in both portions of your assets. In addition, please describe any activities you may be doing to integrate ESG issues into the management of those investments that passively track indices (if you use this approach).

Note that this text - in addition to being part of the full survey - will also be part of the *Executive Summary* of the survey. The *Executive Summary* is a separate document that will collate the text you provide for each of the introductory sections of the survey (GPS and the six Principles).

Ilmarinen has a public ownership policy. Our main three principles within our ownership policy are: active ownership, esg-integration and international norms as the minimum requirement. These three principles have esg-issues at the core albeit at different levels and with different weightings and approaches.

Integration

We have an integrated approach to ESG with regards to in-house managed assets. Our portfolio managers are responsible for implementing all necessary ESG steps in investment decision making. To help them with specific questions/ issues they have a full time RI specialist sitting in our dealing room. We believe that our portfolio managers are the most knowledgeable people regarding their own specific companies and therefore it makes sense that they make the judgement on what ESG issues are material to their companies. The materiality question is very important as it varies between different industries and even companies within an industry. Our RI specialist is there to provide information and help with any research needs that may arise but she does not produce separate ESG-analysis on every company in our portfolios. Our approach is such that we feel that ESG issues are often very much financial by nature (directly or indirectly) and therefore they need to be assessed in conjunction with traditional financial analysis.

International norms as a minimum requirement

We have a formal ownership policy which state our minimum requirement and preferred approaches in integrated investment decision making. In our ownership policy we state that we require companies we invest in to follow legislation and international norms. In case a company fails to adhere to these requirements, it is either excluded from our investment universe (least preferred option) or we will start an engagement process (the preferred option) irrespective if we have current holdings in that company or not.

Active ownership

This issue is discussed at length within UN PRI Principle 2

Q 20 What percentage, by asset class, of your organisation's assets under active management internally integrate the consideration of RI/ESG issues in investment decision making processes - such as researching ESG information and/or constructing/managing portfolios - and to what extent?

Please note that the percentages requested here are different from the data in Q8.

Asset class	What percentage of assets under active management internally (see example in notes) (+/- 5 per cent is sufficient)	Research (gathering and analysing)	Portfolio construction and management
Listed equity (developed markets)	100 %	Large	Large
Fixed income - sovereign and other non-corporate issuers	100 %	Large	Large
Fixed income - corporate issuers	100 %	Large	Large
Non-listed real estate or property	100 %	Large	Moderate
Hedge funds	100 %	Moderate	Small

Q 21 For the assets under active management internally that integrate the consideration of RI/ESG issues, to what extent do you have a process for monitoring the capability of investment analysts, portfolio managers and other relevant investment professionals on how they integrate the consideration of RI/ESG issues into investment analysis and decision-making processes?

Applies only to investments that include integration of RI/ESG issues as indicated in Q20.

Monitoring	
Please select:	
Asset class	"Large", "Moderate", "Small" or "Not at all"
Listed equity (developed markets)	Large
Fixed income - sovereign and other non-corporate issuers	Moderate
Fixed income - corporate issuers	Large
Non-listed real estate or property	Moderate
Hedge funds	Moderate

Q 22 What percentage, by asset class, of your organisation's assets under active management externally did you specify - contractually or via other agreement - that the consideration of RI/ESG issues be integrated into the investment decision-making processes of your external investment managers?

For these assets, what is the extent of integration you agreed upon and to what extent do you monitor such integration?

Please note that the percentages requested here are different from the data in Q8.

Asset class	Assets under active management externally (see example in notes)	Agreed RI/ESG integration	Monitor
	(+/- 5 per cent is sufficient)	Please select: "Large", "Moderate" or "Small"	Please select: "Large", "Moderate", "Small" or "Not at all"
Listed equity (developed markets)	65 %	Moderate	Moderate
Listed equity (emerging markets)	50 %	Moderate	Moderate
Fixed income - corporate issuers	40 %	Moderate	Moderate
Private equity	30 %	Moderate	Moderate
Non-listed real estate or property	100 %	Moderate	Moderate
Hedge funds	0 %		

Q 23 When searching for and selecting external investment managers for your current portfolio, to what extent did your organisation consider the capabilities of external investment managers to consider RI/ESG issues?

Please select:	
"Large", "Moderate", "Small" or "Not at all"	
Please select:	Large

Q 24 Has your organisation directly, or via a mandate with an external manager, requested that any passive index tracking investments be managed relative to indexes that are constructed using relevant ESG issues?

Please select: "Yes" or "No"

Please select:

No

Please add any other comments regarding how you are, or are not, addressing ESG issues in your passively managed investments.

We are focusing our ESG-efforts on any new external asset managers. We are gathering information on our existing managers as well (have been doing it for quite some time now) to get a very good picture of the asset manager field. We are requesting information on PRI signatory position, ESG knowledge, the competence and training issues as a normal part of our RfP's. We are still lacking in gathering the information on our old and on-going relationships. Also the ESG issue in Finland is fairly new so that many asset managers are still unaware of these issues. We are trying to improve the situation by teaming up with other Finnish PRI signatories. We are a founding member of Finsif -Finland's Sustainable Investment Forum. Within Finsif we have approach Finnish equity brokers and asked them to incorporate ESG-issues in their corporate research. This information has spread across the Finnish market very well and asset managers are well aware of this increasing demand from investors on ESG-issues.

Q 25 Please add any overall comments and clarifications related to Principle 1 here. Please also describe any significant activities relating to Principle 1 not already captured by your answers above.

Due to organisational changes internally the Private Equity and Hedge fund activities were for some time with limited resources allocated to RI. Last year we have increased the collaboration between PE/hedge fund portfolio managers and our RI specialist to further improve the current situation. New and more in depth questions on ESG have been added to our PE and hedge fund RfP's.

A large share of our external hedge fund investments are done to fund of funds and therefore our influence in the final investment decision is limited. We are active towards the fund of funds but not to the funds the fund of funds invests in.

Principle 2 - We will be active owners and incorporate ESG issues into our ownership policies and practices.

This section is focused on active ownership and is divided into three parts. You will see only those questions relevant to your organisation.

The first part addresses voting related to listed investments. The second part addresses non-voting engagement activities undertaken by your organisation or on your behalf by third parties with listed equity and corporate fixed income issuers. For the purpose of this survey, the term 'engagement' refers to non-voting contact with companies to discuss concerns regarding ESG issues. The third part addresses ownership and engagement practices for other asset classes such as sovereign and other non-corporate fixed income issuers, private equity, non-listed real estate/property, hedge funds, and infrastructure. This third section also covers any listed equities where investors have significant control (as defined in Q9, explanatory note [B]).

The third section is necessary to account for the differing levels of influence that investors may acquire when investing in other asset classes versus those of listed equities.

The contents and parts for this section of the survey are therefore:

1. Voting and engagement activities related to listed equity investments undertaken by:
 - A. internal staff;
 - B. external parties (e.g., service providers and external managers).
2. Engagement activities related to corporate fixed income issuers;
3. Ownership and engagement activities for sovereign and other non-corporate fixed income, private equity, non-listed real estate and property, hedge funds, and infrastructure, as well as listed equities when they represent significant control.

While completing this section you are free to move to any of the other sections of the survey without losing work already done.

Please note that for this survey, proxy voting activities entail any casting of votes at AGMs and the filing or co-filing of resolutions. Engagement activities refer to all interactions with investee companies that are not related to voting activities. Engagement activities should seek to achieve relevant information and promote better ESG performance by companies. Such activities involve usually written communications, phone calls and meetings with management. For indirect investors in certain asset classes, such as private equity, infrastructure, and non-listed real estate, active ownership may not be possible with the underlying asset. Active ownership in this case should be viewed as engaging with third party managers to consider and interact on ESG issues with underlying holdings. Working with governments to modify laws, rules and regulations in favour of ESG issues should not be counted as engagement in this part of the survey and it will be addressed separately in Principle 4 and 5.

Q 26 Please provide a description of your organisation's approach to this Principle. For example, how is your organisation an active owner and how does it incorporate ESG issues in its ownership policies and practices?

Describe both your voting activities and any other engagement activities you undertake across the different asset classes you hold.

Note that this text - in addition to being part of the full survey - will also be part of the *Executive Summary* of the survey. The *Executive Summary* is a separate document that will collate the text you provide for each of the introductory sections of the survey (GPS and the six Principles).

Active ownership within domestic holdings

We have adopted a very active ownership strategy regarding our domestic holdings. Our domestic equity holdings account for approx. 42% of our equity portfolio. With Finnish equities we vote at over 90% of all ballots and if the comparison is made on the monetary value of our investments, we will reach approx. 99% of all ballots.

Besides voting we regularly meet with senior managements, chairmen of the boards and other board members. In these meetings we will raise ESG issues if needed. We prefer to do private and confidential engagement as our experience has shown that in these types of discussions we are in a better position to give feedback and achieve more than in public discussions.

Active ownership within foreign equities

On foreign equities we only vote on a case by case basis where there are significant, material issues and we have a significant holding. We meet with company executives but on a less regular basis compared to the Finnish companies. We have been very active with regards to engagement with BP for example and also our Nordic Engagement Co-operation with Folksam and KLP has proven to be an effective tool to do collaborative engagements with foreign companies.

Engagement

With incident driven engagement we do not differ between domestic and foreign companies the same way we do with proxy voting. As we have a very good relationship with Finnish companies we, however prefer to do engagements on our own.

Therefore collaborative and/or public engagement is less frequent with domestic issues compared to foreign ones. With foreign company engagements we prefer collaborative engagements as they have proven quite successful.

Q 27 Do you have a (proxy) voting policy, and, if so, does it address environmental, social and governance (ESG) issues?

Do you have a voting policy? Yes

If Yes, please select all that apply: Environmental
Social
Governance

Q 28 For listed equities, please indicate the ratio of (proxy) votes cast, either directly or via third parties (such as an external service providers or external investment manager), against those you could have cast in 2010 for at least one of the following measures:

- by ballots item or resolution;
- by meetings (e.g. AGMs, EGMs, special);
- by listed assets under management.

Please answer for at least one of these measures, if available please provide others as well

We do not track our listed equity voting activities

	Ballot items	Meetings	Listed assets	
Actually cast vs. all you could have cast	%	%	66 %	

Q 29 For listed equities, who makes voting decisions on behalf of your (or your client's) organisation? Please rank the importance of the different groups listed below based on the proportion of decisions made by that group.

Please note that subsequent questions will be asked specifically on the group that you list as most important and - if specified - of the second and third most important. Only the activities of the most important will be scored.

Please select from:
"Internal investment manager or other internal staff"
"Internal voting or governance group"
"External investment manager"
"External proxy voting service"
"External service provider" or
"Other third party voting support entity"

Most important: Internal voting or governance group
Second most important: External investment manager
Third most important:

Q 30 For those listed equity votes you cast:

- a. to what extent is information related to voting items gathered and analysed before voting decisions are made; and
- b. do you monitor whether voting is done in accordance with your voting instructions?

a. Information gathered and analysed

b. Monitor voting

Please select
"Large", "Moderate", "Small" or "Not at all"

Please select
"Yes, for all", "Yes, for some" or
"No, we make no effort to ensure"

Large

Yes, for all

Q 31 Do you pro-actively inform your listed equity companies of your rationale when you abstain or vote against management recommendations?

Please select one: Yes, for all

If "Yes", please indicate how this disclosure is communicated to companies.

If answering "No", please explain why.

We will contact them directly usually via telephone. We inform before the AGM/EGM either the company's legal counsel who acts as the board's secretary or the chairman of the board/ supervisory board and in some cases the CEO. We prefer this direct contact so we can explain our voting behaviour and provide the company the possibility to ask for any clarifications.

Q 33 For listed equity votes that your external manager or service provider casts on your behalf, to what extent did you monitor that voting decisions were analysed and made in accordance with your (proxy) voting policy?

Please select
"Large", "Moderate", "Small" or "Not at all"

Please select one:

Small

Q 34 How does your listed equity securities lending programme address voting?

Please select one: We do not have a securities lending programme

Q 35 To what extent do you and/or your agents review shareholder resolutions put forward by other shareholders to determine whether or not to support the resolution?

Please select
 "Large", "Moderate", "Small", "Not at all" or
 "We do not vote on shareholder resolutions"

Voting - managed internally	Large
Voting - managed externally	Small

Q 36 How many shareholder resolutions related to ESG issues did you file or co-file during 2010 and, of these, what percentage were:

- voted on by shareholders?
- withdrawn due to changes at and/or negotiations with the company?
- withdrawn with no changes at the company in 2010?

	As Lead filer	As Co-filer
Number of ESG shareholder resolutions filed	0	9
Of these:	Of these led shareholder resolutions	Of these co-filed shareholder resolutions
<i>Voted on</i>	%	100 %
<i>Withdrawn due to changes at and/or negotiations with the company</i>	%	0 %
Withdrawn for other reasons, please specify:	%	0 %
Total percentage (must be 100%)	0 %	100 %

Please explain why you filed or co-filed any shareholder resolutions related to RI/ESG issues during 2010.

We co-filed shareholder resolutions on governance issues in 2010. Either the resolutions were put forward by an outside nomination committee on board composition or we publicly supported some shareholder resolutions on governance issues. We didn't file or co-file any environmental or social resolutions during 2010. We feel that filing resolutions is very important part of active ownership but even more so is the dialogue between board, senior management and major shareholders. Therefore we influenced many resolutions put forward by the management even if technically they were not shareholder resolutions.

Q 37 Do you have a written engagement policy or other documents that direct engagement with listed equity and fixed income issuers; if so, do these policies address environmental, social and governance (ESG) issues?

Asset class	Engagement policy or other documents	Do they address E, S or G
	Please select "Yes" or "No"	Please select all that apply
Listed equities	Yes	Environmental Social Governance
Fixed income - corporate issuers	Yes	Environmental Social Governance

Q 38 Who engages with listed equity or fixed income issuers on behalf of your (or your client's) organisation? Please rank the importance of the different groups listed below based on the engagements undertaken by that group.

Please note that subsequent questions will be asked specifically on the groups that you list here. Only the activities of the most important will be scored (except for question 39 where all will be scored).

Please select from:
 "Internal staff"
 "External engagement service provider(s)"
 "External investment manager(s) "
 "Other external entity"

Most important:	External engagement service provider(s)
Second most important:	Internal staff
Third most important:	Other external entity (specify below)
Fourth most important:	External investment manager(s)

If "Other external entity" is selected, please list it here.

Of other external entities we would like to name Nordic Engagement Co-operation (NEC), a collaborative engagement group founded by KLP (Norway), Folksam (Sweden) and ourselves.

Q 39 In total, how many listed equity and fixed income issuers did your organisation engage with or were engaged with on your organisation's behalf on ESG issues in 2010, by level of engagement?

Please do not double count. Engagements that are listed in one column should not be repeated in another. Choose to list them where the highest level of effort is being applied. Consider both individual and collaborative engagements carried out during the year.

	Internal staff	External engagement service provider(s)	External investment manager(s)	Other external entity
Extensive engagement	3	48	99	13
Moderate engagement	6	123	177	2
Basic engagement	35	24	139	0

We do not track these engagement activities

Q 40 Approximately what proportion of the engagements with listed equity or fixed income issuers undertaken by your organisation or on your organisation's behalf addressed environmental, social or governance (ESG) issues?

(+/- 5% rounding is sufficient)

	Internal staff	External engagement service provider(s)	External investment manager(s)	Other external entity
Environmental	20 %	21 %	37 %	46 %
Social	10 %	74 %	14 %	54 %
Governance	70 %	5 %	49 %	0 %

We do not track these engagement activities

Q 41 To what extent do you assess and monitor the ESG engagement competency and capabilities of the following groups?

Please select:
"Large", "Moderate", "Small" or "Not at all"

Internal staff	Large
External engagement service provider(s)	Large
External investment manager(s)	Moderate
Other external entity	Large

Q 42 Given your (or your client's) engagement policy and/or approach to engagement, to what extent do you or do the third parties acting on your behalf, have a process for identifying and prioritising ESG related engagement opportunities?

Please select:
"Large", "Moderate", "Small" or "Not at all"

Internal staff	Large
External engagement service provider(s)	Large
External investment manager(s)	Large
Other external entity	Large

Q 43 To what extent do you or your third party engagement providers or investment managers set ESG engagement objectives and evaluate engagement successes?

Please select:
"Large", "Moderate", "Small" or "Not at all"

Internal staff	Large
External engagement service provider(s)	Large
External investment manager(s)	Large
Other external entity	Large

Q 44 To what extent do you or your external investment manager integrate the information gained from ESG engagements into the investment decision-making process?

Please select:
"Large", "Moderate", "Small" or "Not at all"

Internal staff	Large
External investment manager(s)	Large

Q 45 When searching for and selecting investment managers for your current portfolio, did you consider the capabilities of external investment managers to engage with companies on ESG issues on your behalf?

Please select one: Yes, for all of our external investment managers

Q 46 What percentage of engagements with listed equity and fixed income issuers that ended in 2010 were deemed successful?

	Internal staff	External engagement service provider(s)	External investment manager(s)	Other external entity
Engagement success	20 %	3 %	%	7 %

What measures does your organisation or its external service provider(s) and or external manager use to assess the impact and success of engagement with listed equity and fixed income issuers, and how did you perform in 2010 based on those measures?

We have a goal in mind when we set out to do engagement. If the goal is achieved we consider the engagement a successful. In cases where the company does not change its behaviour but has been willing to have a dialogue with us over the issue is not considered as a success but neither it is a complete failure. Failures are cases where the company has not been willing to negotiate nor discuss the issues at hand.

Our service provider and other external entity have written, pre-determined goals and the impact and success of engagement is continuously monitored.

For example our external engagement service provider defines success the following way:
 For each engagement case there is a set of revision criteria that a company needs to fulfil before the case will be revised.
 During 2010, two companies fulfilled all the revision criteria which is outlined below.

1. The violation has ceased;
2. The company has adopted a responsible course of action;
3. The company has taken a proactive and precautionary approach to improve routines and prevent future violations;
4. The company's action is verifiable.

Investment managers

Most of our external investment managers have written goals but their assessment over success is not comparable and thus it is impossible to give an exact percentage figure on successes (e.g. some of them provide written statements on successes and do not attach a numerical value to successes).

Q 47 Do you have an active ownership policy and/or strategy that addresses environmental, social and governance (ESG) issues for each of the following asset classes?

Asset class	Policy and/or strategies address
Fixed income - sovereign and other non-corporate issuers	Environmental Social Governance
Private equity	Governance
Non-listed real estate and property	Environmental Social Governance
Hedge funds	Governance

Q 48 Per asset class, which role is most important in bringing forth active ownership activities on your behalf and, to what extent are ESG issues addressed by this role in these ownership activities?

Asset class	Select the most important: "Internal staff", "External engagement service provider(s)", "External investment manager(s)", "Other external entity" or "Nobody"	Please select the extent of active ownership activities: "Large", "Moderate" or "Small" for each of the categories selected
Fixed income - sovereign and other non-corporate issuers	Internal staff	Large
Private equity	Internal staff	Moderate
Non-listed real estate/property	Internal staff	Moderate
Hedge funds	Internal staff	Moderate

Q 49 To what extent do you assess and monitor ESG active ownership competency and capabilities undertaken by the groups listed below in the following asset classes: Listed equities with significant control, fixed income, sovereign and other non-corporate issuers, private equity, non-listed real estate/property, hedge funds and infrastructure?

	Please select: "Large", "Moderate", "Small", "Not at all" or "Not applicable"
Internal staff	Moderate
External engagement service provider(s)	Large
External investment manager(s)	Small
Other external entity	Large

Q 50 Please describe your organisation's , your external service providers or your external investment manager's approach to addressing ESG issues in active ownership in the following asset classes. Please include a description of the processes used to ensure ESG issues are addressed, any metrics used to gauge success, the sources of your expertise and specific examples.

Asset class	Please add your remarks
Fixed income - sovereign and other non-corporate issuers	We have meetings with senior execs, we do plant/ office visits. In these instances ESG-issues are brought forward as/ when needed or deemed important. Meetings can also be arranged on very specific ESG issues with a very detailed agenda on ESG only. Sometimes production site visits are planned solely around some specific E, S or G issue. We use external service providers and our external investment managers as well as specialised research to increase our knowledge and understanding, thus making engagements even more effective.
Private equity	The manager selection plays a key role and in our RfP's we continuously update the questionnaire to add relevant ESG questions. Before any investments we go through their answers and have discussions with potential managers on our own ownership policies. Once we have made the investment we monitor the managers by frequent meetings where ESG issues are discussed. We do not have a special monitoring tool as we feel that it is such an integral part of our portfolio management and it is built in in our investment practices and strategies.
Non-listed real estate and property	We have extensive policies that take ESG-issues into consideration. In our contracts with builders we include items on environmental and governance issues such as energy efficiency, building site maintenance and bribery to name a few. We have ordered all of our buildings to be inspected and classified based on energy efficiency in order to plan modifications and help tenants to achieve energy savings together with our buildings' service providers. We have also signed an energy efficiency agreement where we will decrease the energy usage of all of our buildings by 9% from 2009 to 2015.
Hedge funds	The manager selection plays a key role and in our RfP's we continuously update the questionnaire to add relevant ESG questions. Before any investments we go through their answers and have discussions with potential managers on our own ownership policies. Once we have made the investment we monitor the managers by frequent meetings where ESG issues are discussed. We do not have a special monitoring tool as we feel that it is such an integral part of our portfolio management and it is built in in our investment practices and strategies.

Q 51 Please add any overall comments and clarifications related to Principle 2 here. Please also describe any significant activities relating to Principle 2 not already captured by your answers above.

With our voting policy we feel that we have a good base with our direct holdings. We have tracked the voting of our investment managers and this area is definitely one where we are putting some effort during 2011 as with 65% of our investment managers are PRI signatories but only 8% are reporting their actual votes.

Principle 3 - We will seek appropriate disclosure on ESG issues by the entities in which we invest.

Principle 3 is about ensuring that information related to ESG issues is disclosed by companies and other entities in your organisation's investment universe. It is closely related to your activities on Principle 1 and Principle 2.

This section lists questions regarding:

- Who seeks ESG disclosure information for your organisation;
- The level of detail and content that is sought;
- The information you may be seeking regarding norms, standards, codes of conduct or international initiatives related to RI/ESG.

While completing this section you are free to move to other sections of the survey without losing work you have already done.

Q 52 Please provide a description of your organisation's approach to this Principle. For example, how does your organisation seek appropriate disclosure on ESG issues by the entities in which it invests?

Note that this text - in addition to being part of the full survey - will also be part of the survey's *Executive Summary*. The *Executive Summary* is a separate document that will collate the text you provide for each of the introductory sections of the survey (GPS and the six Principles).

Integrated approach to investment decision-making

As we have an integrated approach, we seek information from various sources: the company itself, research providers, product specialists... Only a few are dedicated ESG-researches/ analysis as we strongly believe in a more modern, integrated approach. Each portfolio managers chooses which research houses they will follow, who will cater best for their particular needs and only some niche issues are coming from ESG-specialists.

We actively encourage companies to respond to Carbon Disclosure Project and Water Disclosure Project. We also discuss in public seminars and in one-on-one meetings with companies, the need for integrated reporting. We also help companies to develop their reporting by participating in any surveys or interviews they carry out with their investor base.

Q 53 Who asked for and/or collected from your organisation's investee companies (or other investment entities) information about their ESG policies, practices or performance in 2010?

Please select all that apply

Internal staff	<input checked="" type="checkbox"/>
External investment manager(s)	<input checked="" type="checkbox"/>
External engagement service provider(s)	<input checked="" type="checkbox"/>
External research providers	<input checked="" type="checkbox"/>
Brokers / dealers	<input checked="" type="checkbox"/>

Other - please specify:

None of the above: Investee companies, or other investment entities, were not asked to provide information about their ESG policies, practices or performance in 2010 (please specify below why not)

If investee companies were not asked, please specify why.

Q 54 To what extent did you or your external agent(s) seek appropriate disclosure on ESG issues by the investees and, where necessary, encourage investee companies to produce standardised and/or systematic reporting about their ESG policies, practices or performance in 2010?

Please select:
"Large", "Moderate", "Small" or "Not at all"

Asset class

Listed equity (developed markets)	Large
Listed equity (emerging markets)	Moderate
Fixed income - sovereign and other non-corporate issuers	Moderate
Fixed income - corporate issuers	Large
Private equity	Small
Non-listed real estate or property	Large
Hedge funds	Small

Q 55 In which format or mechanism have you or your third party agents requested reporting on ESG policies, practices or performance?

Reporting formats

Please select all that apply

Integrated with regular financial reports	<input checked="" type="checkbox"/>
Standalone corporate (social) responsibility or sustainability reports	<input type="checkbox"/>
Global Reporting Initiative (GRI)	<input type="checkbox"/>
Carbon Disclosure Project (CDP)	<input checked="" type="checkbox"/>
Global Framework for Climate Risk Disclosure	<input type="checkbox"/>
Communication on Progress (COP) by the United Nations Global Compact	<input type="checkbox"/>
Country-level company form of the Extractive Industries Transparency Initiative (EITI)	<input type="checkbox"/>
Submission of a tailored survey	<input type="checkbox"/>
Other reporting framework by an industry or association - please specify: Water Disclosure Project	<input checked="" type="checkbox"/>
None of the above	<input type="checkbox"/>

Q 56 To what extent did you or your third party agents seek information from companies regarding their practices related to norms, standards, codes of conduct or international initiatives/ declarations/ conventions related to ESG issues in 2010?

Please select:
"Large", "Moderate", "Small" or "Not at all"

Please select: Large

Q 57 Please add any overall comments and clarifications related to Principle 3 here. Please also describe any significant activities relating to Principle 3 that are not already captured by your answers above.

We are a very active member of Finsif and Finsif together with Swesif sent out a letter to Nordic brokers on incorporating ESG-issues into their analysis. Although this letter was sent in 2011 and will be discussed in detail in next year's survey, we feel that it is worth mentioning here. The letter has resulted in our RI specialist being asked to speak at broker houses on what ESG-issues should be included and what kind of reporting it should be.

Principle 4 - We will promote acceptance and implementation of the Principles within the investment industry.

Principle 4 is about promoting the acceptance and implementation of the Principles for Responsible Investment (PRI) among your clients, service providers, partners, brokers/dealers and other investment industry players. In addition, it is about working with governments, regulators and international bodies to address and define approaches relating to ESG issues.

While completing this section you are free to move to any of the other sections of the survey without losing work already done.

Q 58 Please provide a description of your organisation's approach to this Principle. For example, how does your organisation promote the acceptance and implementation of the Principles within the investment industry?

Please describe how you support the incorporation of ESG factors in the investment industry via mandates, incentives, Request for Proposals (RfPs), policy discussions etc. Please, indicate how your organisation does this in relation to clients and/or beneficiaries, peers or other entities.

Note that this text - in addition to being part of the full survey - will also be part of the *Executive Summary* of the survey. The *Executive Summary* is a separate document that will collate the text you provide for each of the introductory sections of the survey (GPS and the six Principles).

Ilmarinen

We have for years now asked potential service providers if they are PRI signatories and if not, why not. We also promote our signatory position in public discussions (seminars, conferences, our web site, annual report...) and internal stakeholder discussions. We have been advocating many industry standards, have encouraged academics to do studies on responsible investment by providing them with data and connections and we have been involved in working groups and discussion groups to further enhance esg-issues, notably governance issues through working groups and E/S through discussions.

We have also been very open on our signatory position and have held talks, "workshops" and "pep talks" to potential signatories usually when asked to do so. We have also been one of the driving forces in setting up Finsif. This work started during 2009 and Finsif was officially established In June 2010 together with the big Responsible Investment 2010 -seminar.

Finsif

The Responsible Investment 2010 -seminar attracted more than 400 investors, academics and other interested parties. After the seminar there has been a huge buzz within the Finnish investor base around responsible investment. The number of Finnish PRI signatories has grown rapidly making Finland one of the largest growing markets world wide. Ilmarinen has been a very active member since the planning stages.

Q 59 Did you include RI/ESG considerations when working with service providers and/or external investment managers in 2010 (where applicable)?

Specifically when:

- a. searching for service providers or external managers;
- b. agreeing on service requirements;
- c. structuring incentive schemes.

Service providers or external managers	a. Searches	b. Agreements	c. Incentives	We do not work with this type of provider
	If you work with this type of service provider, please select "Yes, for all", "Yes, for some" or "No"			
Brokers / dealers	Yes, for all	Yes, for some	Yes, for some	
External engagement service provider	Yes, for all	Yes, for all	Yes, for all	
Investment consultant				✓
Investment research provider	Yes, for all	Yes, for some	Yes, for some	
Proxy voting service provider				✓
External investment manager	Yes, for all	Yes, for some	Yes, for some	

Other - please specify:

Q 60 To what extent did you encourage peer organisations and/or your institutional clients and/or other investment industry players to consider RI/ESG issues in 2010?

Please select:
"Large", "Moderate", "Small" or "Not at all"

Please select: Large

Q 61 Does your broker evaluation process (which determines how you allocate commissions to brokers) include an ESG component, and/or do you have a budget to pay for broker research on ESG issues?

Please select:
"Yes" or "No"

Please select: Yes

Q 62 To what extent do you identify ESG issues and suggest them to brokers or other investment research providers for research?

Please select:
"Large", "Moderate", "Small" or "Not at all"

Please select: Moderate

Q 63 To what extent did you engage in dialogue, lobbying or initiatives pertaining to government policy and/or industry regulations related to RI/ESG issues in 2010?

Please select:
"Large", "Moderate", "Small" or "Not at all"

Please select: Moderate

Q 64 Please add any overall comments and clarifications related to Principle 4 here. Please also describe any significant activities relating to Principle 4 not already captured by your answers above.

Principle 5 - We will work together to enhance our effectiveness in implementing the Principles.

Principle 5 is about collaborating with others in your implementation of responsible investment. The questions in this section are designed to capture the many ways in which signatories collaborate (for example by using the PRI Clearinghouse), and thus may overlap with areas discussed previously in the survey. However, the focus here is only those activities that involve working with others to implement the Principles.

While completing this section you are free to move to any of the other sections of the survey without losing work already done.

Q 65 Please provide a description of your organisation's approach to this Principle. For example, how does your organisation work with other parties to enhance its implementation of the Principles?

Note that this text - in addition to being part of the full survey - will also be part of the *Executive Summary* of the survey. The *Executive Summary* is a separate document that will collate the text you provide for each of the introductory sections of the survey (GPS and the six Principles).

Active member

We are a member of several groups, initiatives, working groups. Some of these initiatives are still growing and informal but others such as CDP are more established and formal. Due to the different stages the initiatives are in, our work within these groups is different too:

With CDP, we contact non-responding companies to encourage them to respond, we describe our membership position in public and private discussions, participate in CDP working groups to provide the investor side to the companies asked to participate.

With NEC, the initiative is now maturing but we still need to establish ourselves to the companies and the investment community. We do collaborative engagement, discuss strategies with each other and describe the initiative to companies and other investors. Our work is more systematic with written, pre-determined engagement goals, meeting minutes and overall a more formal approach. Compared to CDP, NEC is much more hands on throughout the year whereas with CDP we can best help the initiative when the CDP secretariat identifies situations where they need investor support.

Finsif was formally launched in 2010 and it took us some time to get ourselves more organised. But towards the end of the year, we had a few members only meetings relating to GRI reporting and problems arising from palm oil industries. As the initiative is still at the beginning, we are still looking at different ways to work together with other investors. The idea behind Finsif, however, is to provide a forum for investors, investment managers, service providers, media and other stakeholders interested in responsible investment and also to educate the ones who are not familiar with these issues. We will organise seminars, conferences and work shops.

With some other well known initiatives we have taken more of a back seat approach: we are a member, attend seminars, conferences and on an ad-hoc basis can take a more active approach.

Q 66 To what extent did you collaborate with other investors in regard to the Principles, and what Principle did you collaborate most on?

Extent of Collaboration	Principle you collaborated most in
Please select: "Large", "Moderate", "Small" or "Not at all"	Please select: Principle 1, 2, 3, 4 or 6
Large	Principle 2

Q 67 Did you log in to the PRI Engagement Clearinghouse in 2010 and if so, how did you use it?

Logged in?	If Yes, please select all that apply
Yes	<p>Led a collaborative engagement and posted it to the Clearinghouse</p> <p>Joined a collaborative engagement led by another signatory that was posted on the Clearinghouse</p> <p>Used it as a learning tool or keep up to date with current engagements</p>

Q 68 Did your organisation participate in any RI/ESG-issue related associations?

Among those you did participate in, please select:

- the first, second and third most important to your organisation, and
- for the three most important, to what extent your organisation participated.

For those not listed, please use the 'Other' field.

Associations	Please select all that apply	Please select only one "Most important", one "Second most important" and one "Third most important"	Only for these three most important, please select to what extent: "Large", "Moderate" or "Small"
Carbon Disclosure Project (CDP)	✓		
International Corporate Governance Network (ICGN)	✓	Third most important	Moderate
Regional Social Investment Forums	✓	Second most important	Large
Other (1) - please specify: NEC (Nordic Engagement Co-operation)	✓	Most important	Large
Other (2) - please specify: Water Disclosure Project	✓		

Q 69 Please add any overall comments and clarifications related to Principle 5 here. Please also describe any significant activities relating to Principle 5 not already captured by your answers above.

Principle 6 - We will each report on our activities and progress towards implementing the Principles.

Principle 6 is about your organisation's reporting of responsible investment activities (as opposed to Principle 3 which relates to the reporting of your investees or potential investees). The questions in this section focus on how you disclose your activities regarding the implementation of the Principles and where that disclosed information can be found.

While completing this section you are free to move to any of the other sections of the survey without losing work already done.

Q 70 Please provide a description of your organisation's approach to this Principle. For example, in what ways does your organisation report your implementation of the Principles? Please include any sort of disclosure and transparency practices you have adopted.

Note that this text - in addition to being part of the full survey - will also be part of the *Executive Summary* of the survey. The *Executive Summary* is a separate document that will collate the text you provide for each of the introductory sections of the survey (GPS and the six Principles).

Increased Disclosure

We have increased our reporting in recent years. In 2010 we published the majority of our responses to the PRI survey on our website like we did in 2009. (http://www.ilmarinen.fi/Production/en/ilmarinen/06_investments/06_1_liiteet/unpri2010.pdf). The sections that we didn't publish included sensitive, competitive material e.g. asset allocation figures that differ from official reporting. We published our survey results but as the secretariat made a statement encouraging investors not to publish their results, we removed them from our website.

In our annual report we have a section on our investments where we include our responsible investment policies and some facts and figures. During 2010 we highlighted some engagement processes and collaborative efforts together with our PRI signatory position. In the annual report we also published our corporate KPI's with regards to Corporate Responsibility items. One of the KPI's is the UN PRI and the requirement is to report on on-going and successful engagement processes.

We also discuss our signatory position and the ways we implement the principles both in public and private discussions. We participate in surveys (academic and non academic) and give interviews to journalists. Although our printed reporting may not be as extensive as with some other signatories', we are very open and willing to discuss these issues with other investors and other stakeholders. We have added each year material on our website on responsible investing as we feel that it is financially and ecologically a better solution than to extend our annual report by several pages.

Q 71 To what extent did you disclose, either to clients/beneficiaries or publicly, your policy and/or approach to incorporating ESG issues into investment analysis and decision-making processes in 2010?

Please select:
"Large", "Moderate", "Small" or "Not at all"

Moderate

If you disclosed, please indicate how this disclosure can be obtained - a web address (URL) would be sufficient. If answering *not at all*, please explain why not.

*Yes, you did disclose:
how can it be obtained*

The 2010 Survey Responses
http://www.ilmarinen.fi/Production/en/ilmarinen/06_investments/06_1_liiteet/unpri2010.pdf

Ilmarinen's Ownership Policy
http://www.ilmarinen.fi/Production/en/ilmarinen/06_investments/06_1_liiteet/omistajapol_0907_en.pdf

Ilmarinen's Annual Report
https://www.ilmarinen.fi/Production/fi/x_pdf_liitteet_julkaisut/Ilmarinen_in_2010.pdf

*Did not disclose publicly:
please explain why not*

Q 72 Did you disclose your voting policy in 2010?

Please select one: Yes - disclosed publicly

If 'Yes, disclosed publicly', please indicate how it can be obtained - a URL would be sufficient. If not, please explain why not.

*Yes, disclosed publicly:
how can it be obtained* We have disclosed our voting policy partly in our ownership policy and when asked we will disclose actual votings. We have not added our votings on our website as they have not been requested by clients, beneficiaries or other stakeholders. We have been discussing our votings related to specific companies prior to meetings with other investors (discussions were initiated by us). Some individual votes have been asked in previous years but they have been in relation to our clearinghouse postings.

*Did not disclose publicly:
please explain why not*

Q 73 Did you disclose your (proxy) voting record in 2010, and if so:

- How much of your voting record did you disclose?
- Did you disclose the explanations/reasons for voting as you did?
- How frequently did you disclose?

Did you disclose? (please select one)	How much of your voting (please select one)	How much explanation? (please select one)	How frequently? (please select any applicable)
Yes - disclosed publicly	All votes	Explained all votes	Disclosed annually

If 'Yes, disclosed publicly', please indicate how it can be obtained - a URL would be sufficient. If not, please explain why not.

*Yes, disclosed publicly:
how can it be obtained* We have disclosed when asked (in person, telephone, e-mails). We haven't produced a report on our votings. We have disclosed in our annual report the actual number of agm's attended but not the votes. We have provided explanations when we have initiated conversations on our votings (we will be ready to explain if some asks us too). If we vote against company management we will explain our voting to the company in person/ over the telephone prior to the meeting.

*Did not disclose publicly:
please explain why not*

Q 74 Did you disclose your non-proxy voting active ownership and engagement policies or other documents that direct these activities?

Please select one: Yes - disclosed publicly

If 'Yes, disclosed publicly', please indicate how it can be obtained - a URL would be sufficient. If not, please explain why not.

*Yes, disclosed publicly:
how can it be obtained* A section on engagement is in our ownership policy. Also we have explained the idea of engagements in our annual reports. We have sometimes published examples of engagements in our annual report and our customer magazine. We will not disclose actual, on-going engagements unless there is a specific need to do so (improve the engagement). We have also mentioned some of our active ownership strategies in our public ownership policy.

Ilmarinen's Ownership Policy

http://www.ilmarinen.fi/Production/en/ilmarinen/06_investments/06_1_liiteet/omistajapol_0907_en.pdf

Ilmarinen's Annual Report

https://www.ilmarinen.fi/Production/fi/x_pdf_liitteet_julkaisut/Ilmarinen_in_2010.pdf

Ilmarinen's Responses

http://www.ilmarinen.fi/Production/en/ilmarinen/06_investments/06_1_liiteet/unpri2010.pdf

*Did not disclose publicly:
please explain why not*

Q 75 To what extent did you disclose (either to clients/beneficiaries or publicly) your non-proxy voting RI/ESG issue-related active ownership and engagement activities, results and progress in 2010?

Please select:

"Large", "Moderate", "Small" or "Not at all"

Please select:

Moderate

If you disclosed, please indicate how this disclosure can be obtained - a web address (URL) would be sufficient. If answering not at all, please explain why not.

*Yes, you did disclose:
how can it be obtained* A section on proxy voting is in our ownership policy. Also we have described our agm attendance in our annual reports. We have sometimes published examples of votings in our annual report and our customer magazine. Ilmarinen's Ownership Policy
http://www.ilmarinen.fi/Production/en/ilmarinen/06_investments/06_1_liiteet/omistajapol_0907_en.pdf

Ilmarinen's Annual Report

https://www.ilmarinen.fi/Production/fi/x_pdf_liitteet_julkaisut/Ilmarinen_in_2010.pdf

Ilmarinen's Responses

http://www.ilmarinen.fi/Production/en/ilmarinen/06_investments/06_1_liiteet/unpri2010.pdf

*Did not disclose publicly:
please explain why not*

Q 76 Did you disclose (either to clients/beneficiaries or publicly) RI/ESG activities, results and progress related to Principle 3, Principle 4 or Principle 5 in 2010?

Please select "Yes, disclosed publicly", "Yes - disclosed to clients or beneficiaries only" or "Not at all"

Principle 3 Yes - disclosed publicly

If 'Yes, disclosed publicly', please indicate how it can be obtained - a URL would be sufficient. If not, please explain why not.

*Yes, disclosed publicly:
how can it be obtained* We will publish and we have published the majority of our survey answers on our website (2009 and 2010). Mainly the sections left out have been asset allocation figures.

We have also written on these issues in our customer magazine (only in Finnish).

http://www.ilmarinen.fi/Production/en/ilmarinen/06_investments/06_1_liiteet/unpri2010.pdf

*Did not disclose publicly:
please explain why not*

Please select "Yes, disclosed publicly", "Yes - disclosed to clients or beneficiaries only" or "Not at all"

Principle 4 Yes - disclosed publicly

If 'Yes, disclosed publicly', please indicate how it can be obtained - a URL would be sufficient. If not, please explain why not.

*Yes, disclosed publicly:
how can it be obtained* We will publish and we have published the majority of our survey answers on our website (2009 and 2010). Mainly the sections left out have been asset allocation figures.

We have also written on these issues in our customer magazine (only in Finnish).

http://www.ilmarinen.fi/Production/en/ilmarinen/06_investments/06_1_liiteet/unpri2010.pdf

*Did not disclose publicly:
please explain why not*

Please select "Yes, disclosed publicly", "Yes - disclosed to clients or beneficiaries only" or "Not at all"

Principle 5 Yes - disclosed publicly

If 'Yes, disclosed publicly', please indicate how it can be obtained - a URL would be sufficient. If not, please explain why not.

*Yes, disclosed publicly:
how can it be obtained* We will publish and we have published the majority of our survey answers on our website (2009 and 2010). Mainly the sections left out have been asset allocation figures.

We have also written on these issues in our customer magazine (only in Finnish).

http://www.ilmarinen.fi/Production/en/ilmarinen/06_investments/06_1_liiteet/unpri2010.pdf

*Did not disclose publicly:
please explain why not*

Q 77 Please add any overall comments and clarifications related to Principle 6 here. Please also describe any significant activities relating to Principle 6 not already captured by your answers above.

Feedback on the PRI

This section asks about how being part of the PRI Initiative affects your organisation. Questions in this section are all optional and mostly text-based. This is the place where your organisation can inform the PRI Secretariat of its achievements, and its challenges in implementing RI/ESG. The Secretariat will keep this information confidential and use it to:

- a. Further develop services and tools that can support your organisation in implementing the PRI and;
- b. Identify best practices that can be developed, with signatories' consent, into case studies and/or guidance tools to be shared with other signatories via the annual [Report on Progress](#), the [PRI extranet](#) and other tools.

Please note this section is not designed for feedback on the Assessment survey itself. You will have the opportunity to give your feedback on the process in a separate section upon completion of the survey.

While completing this section you are free to move to any of the other sections of the survey without losing work already done.

Q 78 Please describe the main benefits your organisation has enjoyed as a result of adopting the PRI.

The questionnaire provides us with a 'benchmark' tool to see how we are doing with regards to ESG issues. We don't feel pressurised to benchmark ourselves against our peers but the questionnaire provides us a road map to see what issues may need to be improved the most. We feel that due to the nature of our business (statutory pension insurance) sometimes our needs/ desires may be slightly different from asset managers' needs for example. Therefore there is no need to compete against other signatories on who is at the top of each principle but to use this survey as a road map and innovation source on how things might be improved if needed. Being a PRI signatory also shows the level of our commitment to these issues to our stakeholders.

Q 79 What has your organisation changed as a direct result of becoming a PRI signatory?

We have a more systematic approach to responsible investment and we strive to do improvements more focused and concisely. We have improved our reporting and become more transparent. When we first started on this path in 2002, we didn't even disclose the name of our screening partner. Today we disclose the majority of our responses to the PRI questionnaire. We feel that that is a huge improvement and hopefully this will prompt other signatories to increasingly publish their responses.

Q 80 What are the top three activities the PRI Secretariat could undertake to support and encourage further implementation of the Principles by current and prospective signatories?

Please add the first activity

1. Organise face to face meetings, discussions, work shops and debates

Please add the second activity

2. Make sure that even as the PRI community grows, there remains the feeling that we are all part of the family, working together towards a common goal (although there may be several goals, that might be slightly different for individual signatories, but they are not contradicting by nature).

Please add the third activity

Q 81 What are your top three PRI-related goals/priorities for 2011?

Please add the first goal/priority

Still improve internal training on ESG issues.

Please add the second goal/priority

Still continue on the path to improve reporting and disclosure

Please add the third goal/priority

Improve further the level of knowledge on ESG issues within the industry and stakeholders.

Q 82 What were the most significant achievements in 2010 in terms of your implementation of the Principles?

Please provide at least three.

Principle 1: the most significant achievements in 2010 in terms of your implementation

Improved collaboration between asset classes on ESG-issues

Principle 2: the most significant achievements in 2010 in terms of your implementation

We have maintained our good level of AGM attendance and managed to put forward a few changes in some ballots. We have succeeded in establishing the NEC and this work will continue in 2011. We had several extremely good engagement contacts within NEC during 2010.

Principle 3: the most significant achievements in 2010 in terms of your implementation

We continued to contact CDP non respondent companies and hopefully the response rate will rise in 2011.

Principle 4: the most significant achievements in 2010 in terms of your implementation

Being a founding member of Finsif and being an active organiser of the Responsible Investment 2010 -seminar in Helsinki.

Principle 5: the most significant achievements in 2010 in terms of your implementation

Being a founding member of Finsif and being an active organiser of the Responsible Investment 2010 -seminar in Helsinki.

Principle 6: the most significant achievements in 2010 in terms of your implementation

We published our survey results in a very extensive way. Added items on our website and continued to discuss our signatory position wherever possible.