

OVERVIEW - HOW TO USE THIS FRAMEWORK

ILPA released this ESG Assessment Framework as a resource for limited partners looking to build a tool to evaluate and understand the various stages of ESG integration that peers are observing among general partners in the market today. It is designed to help LPs evaluate and benchmark GP responses to due diligence efforts, inform goal-setting conversations with GPs and measure ESG integration progress over time. The Framework categorizes activities and processes across four buckets: Not Present, Developing, Intermediate and Advanced. As ESG conversations continue to evolve, many best practices are still being developed. We expect LPs will adapt this Framework as appropriate. This Framework is meant to be representative but not exhaustive and should not be considered a comprehensive guide to best practice in the market.

The Framework and [FAQ document](#) will be updated on a periodic basis as practices evolve and to address feedback and questions received. We invite all participants in the private equity community to send any feedback or questions to esg@ilpa.org.

KEY CONSIDERATIONS

- ILPA developed this Framework using mid/large cap buyout managers and strategies as its reference point. While the Framework may serve as a useful starting point for evaluating managers in other private markets asset classes (venture capital, real estate, infrastructure, private credit, etc.), it was not designed with these asset classes in mind.
- Smaller managers may not have the resources to land in the Intermediate or Advanced buckets but may take actions which put them at the forefront of their peer group. For this reason, it is important to consider manager size and resources and adjust expectations accordingly.
- Category/component descriptions are meant to be directional and are not intended to replace or encompass adherence to specific local requirements or regulatory frameworks. The Framework may not include or reference every Advanced practice, as these can be subjective and will continue to evolve over time. The Framework is not meant to suggest a “one-size-fits-all” approach but provide a starting point for analysis and dialogues with GPs.
- Other considerations and frequently asked questions are addressed in our [FAQ document](#), which will be updated on a periodic basis to include and address questions ILPA receives. If your question has not been answered in our FAQ, please contact ILPA at esg@ilpa.org.

ESG ASSESSMENT FRAMEWORK

COMPONENT	NOT PRESENT	DEVELOPING	INTERMEDIATE	ADVANCED
Status of Current Policy	<p>No ESG policy or lacking/ limited policy; no mention of governance and ESG ownership considerations or a description of the process to integrate ESG considerations in the investment lifecycle which illustrate a policy in action</p> <p><i>*Note, pertaining to ESG policies - LPs should keep in mind that firm level policies may not always apply to specific funds and should ask for clarification where needed</i></p>	<p>Policy looks “off the shelf,” but provides a basic description of the GP’s approach to identifying and managing ESG factors and references basic governance and ownership considerations</p>	<p>Policy is tailored to the GP’s strategy and investable sectors; there is a clear governance structure detailing ESG oversight responsibilities and processes and an approach to identifying material risks and discussing them with portfolio companies</p> <p>GP is able to provide examples illustrating policy integration efforts in prior fund investments</p>	<p>Building upon “Intermediate,” policy references materiality and how ESG considerations drive value creation and are integrated throughout the investment lifecycle, including look-forward assessments and commentary tailored to industry segments in which the GP invests</p>
Approach to Policy Review	<p>No policy implemented; no plans to develop an approach towards the management of ESG considerations</p>	<p>GP may reference plans to periodically review or further develop its ESG policy, but detail regarding frequency and timing is lacking</p>	<p>GP conducts a periodic review (i.e., every 2-3 years) of its ESG policy and can share recent findings and updates</p>	<p>GP reviews its ESG policy regularly (i.e., every 1-2 years) and can describe how its policy has evolved over time; staff at various levels of the organization demonstrate an understanding of recent updates to the policy</p>
Industry Standards and Best Practices	<p>No commitments to industry standards (e.g., PRI signatory) or plans to adopt any standards in the next few years</p>	<p>GP has identified a set of standards towards which it is aligning or working towards formally adopting</p>	<p>GP is a PRI signatory and may have formally adopted other industry standards</p>	<p>GP may have multiple, formal commitments to industry standards or best practices and can demonstrate these commitments are integrated into processes, documentation, training and reporting</p> <p>GP actively participates in driving best practice or standard adoption in the industry</p>
Contractual Commitments	<p>No contractual commitments related to ESG made or referenced in fund formation contracts, LPAs or side letters when requested by investors</p>	<p>Contractual commitments to ESG appear in side letters and may vary from LP to LP</p>	<p>References and commitments to ESG are included in private placement memorandums (PPMs) and side letters</p>	<p>Commitments to ESG are referenced in LPAs and include a commitment to annual ESG reporting</p>

ESG ASSESSMENT FRAMEWORK: CONTINUED

GOVERNANCE

COMPONENT	NOT PRESENT	DEVELOPING	INTERMEDIATE	ADVANCED
ESG Ownership	No governance/ownership in place for ESG considerations	ESG oversight is represented via steering committee or exec-level ownership as a shared responsibility (e.g., part of legal, compliance or investor relations) ESG considerations do not factor prominently in investment committee dialogue or investment decisions	Senior leadership is more actively involved with ESG issues, augmented by full-time staff that help guide the process (it is common for larger GPs to have one or more full-time ESG staff supporting the organization) and third-party experts to provide subject matter expertise Individual(s) charged with ESG oversight sit(s) on investment committees and ESG considerations are factored into committee decision making	Building upon "Intermediate," leadership-driven accountability for ESG ownership extends throughout the organization; including investment, deal team, and portfolio operations professionals, to ensure ESG considerations are integrated into decision-making and operating processes
Capacity Building and Training	No training programs focused on ESG	Ad-hoc ESG training provided for some staff, including new hires responsible for executing some part of the ESG policy	There are more systematic, regular efforts to provide training internally to inform investment teams of ESG best practices Training may focus on ESG integration and capacity building, but also should generate awareness around how and when to work with consultants, service providers and field experts	Systematic, regular efforts to provide training for all staff; training includes recognizing ESG-related risks and opportunities specific to the sectors staff cover Training programs also extend to portfolio operations professionals and to leaders at portfolio companies, providing boards and leadership teams with industry/sector materiality-based topical training, including relevant emerging ESG topics

COMMUNICATIONS & REPORTING

COMPONENT	NOT PRESENT	DEVELOPING	INTERMEDIATE	ADVANCED
Approach to Communication	Little or no coverage of ESG topics at AGMs, LPAC meetings and periodic communications with investors	GP periodically references ESG at AGMs, LPAC meetings and in its annual report	Coverage of ESG topics appears systematically at AGMs, LPAC meetings, in regular communications with investors and in an annual report which includes case studies and KPIs Communication/discussion of ESG risks should be proactive and not limited to incident reporting or problematic situations	Building upon "Intermediate," communications and discussion of ESG extends beyond risk mitigation to focus prominently on value creation in the portfolio GP can comment on recent learnings and progress towards ESG-related portfolio goals or targets; commentary around these topics is integrated into regular communications with LPs, including AGMs and LPAC meetings

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ESG ASSESSMENT FRAMEWORK: CONTINUED

COMPONENT	NOT PRESENT	DEVELOPING	INTERMEDIATE	ADVANCED
Incident Reporting	<p>No policy detailing GP's approach to ESG-related incident reporting or evidence-exemplifying treatment of prior reported incidents</p> <p><i>*Note, for all four categories - LPs may have differing definitions for what constitutes an "incident;" ILPA suggests LPs share and discuss that definition with their GPs</i></p>	<p>GP has a basic approach to ESG-related incident reporting; able to provide limited examples of prior incident communications</p>	<p>Clearly detailed approach to ESG-related incident reporting, GP is able to provide examples of prior communications detailing incidents, resolutions and plans that ensure future incidents are avoided</p>	<p>Building upon "Intermediate" and its ESG-related incident reporting, GP demonstrates a strategic approach to incident remediation and prevention as an organization and can speak to how prior incidents (across funds) have informed its strategy</p> <p>When incidents have or may create headline risk, GP takes a coordinated communications approach that keeps LPs informed on recent developments and media strategy</p>
KPIs and Reporting	<p>No ESG KPIs or reporting in place, plans and procedures for collecting future KPIs and managing reporting are not present</p>	<p>KPIs may be basic in nature (or a work in progress) and may include yes/no answers to a binary set of questions</p> <p>Reporting is often ad-hoc or focused on future capacity building objectives and less on material risks and opportunities</p>	<p>GP is able to collect and report pertinent ESG Data Convergence Initiative metrics or is leveraging a materiality-based process (e.g., SASB/ISSB Standards) to determine investment or strategy specific KPI's for more recent vintages and funds*</p> <p>Annual reporting often includes both quantitative and qualitative updates, including examples and case studies at the portfolio company level</p> <p><i>*Note: for EU managers, reporting would also satisfy any SFDR and EU Taxonomy requirements, specifically, mandatory PAIs and relevant voluntary ones, and taxonomy alignment</i></p>	<p>Building upon "Intermediate," materiality-based KPIs remain in constant view as part of an integrated process that includes benchmarking against targets</p> <p>Annual reporting includes both qualitative and quantitative updates on ESG considerations, including examples and case studies at the portfolio company level with clear linkages to value creation, and broader, stewardship-based objectives and sustainability models</p>

ESG ASSESSMENT FRAMEWORK: CONTINUED

COMPONENT	NOT PRESENT	DEVELOPING	INTERMEDIATE	ADVANCED
Due Diligence	ESG factors are not a consideration in the investment due diligence process	ESG diligence is focused on compliance and/or reputation-driven risks, and included in investment committee processes on an ad-hoc basis, may be entirely outsourced with little evidence of consideration in the investment committee's decision-making processes	ESG diligence is typically a GP-led process which may be augmented by third-party experts, focused on material risks based on clearly articulated materiality standards Risks identified during diligence are discussed and factored into investment committee decision making and may impact how a deal is ultimately structured or managed post-investment; GP is able to provide evidence (reference documents, case studies, etc.) supporting their approach	Building upon "Intermediate," ESG diligence is discussed at investment committees as an integrated component of prospective value creation opportunities, leveraging a materiality-based assessment framework and encouraging significant input from investment, legal and compliance, HR teams, and third-party experts
Post-Investment Management	No monitoring or management of ESG considerations take place after an acquisition occurs	Monitoring and management of ESG considerations is limited and tends to be ad-hoc or reactive	Monitoring and management of ESG considerations occur as part of a structured process that includes portfolio company onboarding, selective KPIs, and annual reviews where risks identified during diligence are examined and actions taken to address any findings are discussed	Monitoring and management of ESG considerations and KPIs are featured as an ongoing part of the GP's management and value creation process; GP is able to speak to the financial impact of ESG considerations across the portfolio and how companies quantify and capture top and bottom-line value creation potential ESG assessments are conducted for all portfolio companies on an annual basis, KPIs are reviewed for year-over-year trends, and board members are trained and accountable for material ESG considerations
Exit and After Sale	No ESG considerations are incorporated into the exit planning process	GP provides ESG-related information to buyers upon request or on an ad-hoc basis	ESG-focused value creation and enhanced risk management considerations feature into investment marketing materials and the data rooms shared with investment bankers and potential buyers GP supports buyers by providing required information and processes to continue ongoing sustainable investment initiatives at time of sale	Building upon "Intermediate," GP formally measures and analyzes the impact of ESG on investment performance and reports on progress at time of exit and is able to provide examples of tangible ESG-linked value creation in prior portfolio company investments GP views the success of asset-level ESG initiatives through a long-term lens that extends past the holding period (e.g., decarbonization over a 25 year horizon) and can discuss processes put in place that enhance the attractiveness of the asset to future buyers

ESG ASSESSMENT FRAMEWORK: DE&I SUPPLEMENT

RESPONSIVENESS TO DE&I

COMPONENT	NOT PRESENT	DEVELOPING	INTERMEDIATE	ADVANCED
Policies and Governance	<p>GP does not have a stated DE&I Policy, Code of Conduct and Family Leave Policy</p> <p>GP does not have a governance process in place addressing ownership of DE&I considerations</p>	<p>GP has written policies that include a stated DE&I Policy*, Code of Conduct (addressing sexual harassment and discrimination) and Family Leave Policy (in jurisdictions without mandated leave)</p> <p>Processes addressing DE&I priorities have clear ownership, commonly with human resources (and HR alone, or a DE&I/ ESG specialist); policy compliance can be illustrated with evidence and examples</p> <p><i>*Note: an Equal Employment Opportunity (EEO) or other basic anti-discrimination policy in and of itself would not constitute a DE&I Policy</i></p>	<p>Building upon “Developing,” GP is able to discuss and provide context re: policy updates and improvements made over the past three years, and can detail any claims of sexual or general harassment, misconduct or discrimination made against current and/or former employees</p> <p>Clear ownership of DE&I processes and priorities at the senior executive level; organization leads regular, ongoing conversations about DE&I priorities and objectives and management is able to articulate meaningful DE&I goals and the steps being taken to address them</p> <p>GP participates in industry initiatives and/or community engagement to advance DE&I (e.g., ILPA’s Diversity in Action initiative)</p>	<p>Building upon “Intermediate,” GP is able to demonstrate recent progress towards stated DE&I priorities and discuss potential evolution of policies; staff at all levels demonstrate an awareness and understanding of the DE&I processes and priorities in place, advanced GPs often leverage independent third parties to review DE&I practices with deliverables that include actionable feedback</p>
Recruiting	<p>No recruitment policy/process exists or existing policy/process does not reference or address DE&I considerations</p>	<p>Recruiting policy/process references DE&I considerations but lacks specific objectives or policies which address those objectives</p>	<p>Recruiting policy/process includes formal considerations that foster a more inclusive process (e.g., interviewing a diverse shortlist of candidates, actively casting a net beyond traditional recruiting pipelines, and working with candidate fellowships & recruiting organizations that serve diverse and historically underrepresented groups)</p> <p>Recruiters, hiring managers and staff participating in the hiring process have undergone training discussing systemic racism and unconscious bias</p>	<p>Building upon “Intermediate,” GP recruitment policy/process includes steps taken to address systemic racism, unconscious bias and advancement of diverse staff and underrepresented groups</p> <p>Staff in recruitment roles may see incentive compensation tied to achievement of these considerations</p>
Employee Engagement	<p>No formal employee engagement programs (e.g., mentorship/ sponsorship programs, employee resource networks) in place to improve and encourage retention</p>	<p>GP has employee engagement and retention programs (e.g., mentorship/ sponsorship programs, employee resource networks) in place but lacks measurable goals and/or objectives</p>	<p>Building upon “Developing,” formal employee engagement programs are in place with training and specific objectives to promote inclusion and retention of diverse staff and underrepresented groups</p>	<p>Building upon “Intermediate,” GP also regularly conducts employee engagement/ feedback surveys (ideally, administered anonymously via third party) to assess culture firmwide, with attention to inclusion</p> <p>GPs should be able to share high level findings of these surveys and discuss forward looking engagement objectives</p>

ESG ASSESSMENT FRAMEWORK: DE&I SUPPLEMENT

COMPONENT	NOT PRESENT	DEVELOPING	INTERMEDIATE	ADVANCED
Diversity Metrics at GP Level	GP does not track or provide diversity metrics at the management company level	GP can provide diversity metrics (upon request and where legally permissible) at the management company level consistent with the ILPA Diversity Metrics Template on an annual basis	Building upon "Developing," GP proactively reports to all LPs diversity metrics (where legally permissible) consistent with the ILPA Diversity Metrics Template and also reports diversity metrics on hiring, promotions and employee turnover	Building upon "Intermediate," GP provides the aforementioned diversity metrics and has begun providing commentary and qualitative analysis focused on pay equity and carry distribution
GP Engagement and Disclosure at the Portfolio Company Level	GP does not engage with portfolio companies on DE&I-related priorities and does not track or provide diversity metrics at the portfolio company level	<p>GP engagement with portfolio companies on DE&I-related priorities may be ad-hoc</p> <p>GP reports diversity metrics (where legally permissible) for portfolio company boards consistent with the ILPA Diversity Metrics Template on an annual basis</p>	<p>GP leadership actively discusses DE&I priorities and future planning with portfolio company leadership and boards</p> <p>Building upon "Developing," reporting also includes portfolio company c-suite/executive management team metrics</p>	<p>DE&I conversations with portfolio company leadership and boards are systematic and results oriented, with indicators of progress evident in the data that is shared</p> <p>Building upon "Intermediate," reporting on diversity metrics also includes qualitative management commentary; GP supports and provides resources to portfolio company boards that facilitate setting and managing diversity priorities</p>

ESG ASSESSMENT FRAMEWORK: CLIMATE SUPPLEMENT

RESPONSIVENESS TO CLIMATE RISKS & OPPORTUNITIES

COMPONENT	NOT PRESENT	DEVELOPING	INTERMEDIATE	ADVANCED
Governance	<p>No governance structure is in place to ensure climate-related risks and opportunities are assessed and managed*</p> <p><i>*Note: throughout this section, climate-related risks references both physical and transition risks; LP expectations around sophistication and maturity across this section may be greater in industries/sectors with greater exposure to climate-related risks (for example: industrial vs software)</i></p>	<p>Climate considerations mandated by regulators are reviewed and managed by GP's internal risk/compliance function</p>	<p>GP has a defined process for conducting climate assessments with ownership and accountability for these responsibilities at the management level; climate due diligence features as an integrated component in investment committee meetings</p> <p>GP invests in capacity building (training, resourcing, participation in industry groups, etc.) for investment professionals to promote awareness of climate considerations across the organization</p>	<p>Building upon "Intermediate," GP leverages a framework/process for both training/capacity building at portfolio companies and monitors how portfolio companies implement and follow through as a result</p>
Strategy	<p>No strategic or guiding principles detailing how climate-related risks and opportunities are considered across funds and portfolio companies</p>	<p>Process for assessing and managing climate risks is nearly or completely outsourced and is focused on compliance-based risks and included in investment committee processes on an ad-hoc basis</p> <p>Assessments may be done at the fund level, i.e., the risks climate change poses broadly to the sectors in which the GP invests</p>	<p>Process for managing and assessing climate risks is typically a GP-led process which may be augmented by third-party experts, focused on material risks</p> <p>Assessments are often done on a deal-by-deal basis and may occasionally feature opportunities for value creation, in addition to risk analysis</p>	<p>Building upon intermediate, GP assesses and manages material climate risks and value creation opportunities across its entire portfolio at both a macro (i.e., systemic risk) and deal-by-deal level</p> <p>In addition to assessing risks and opportunities, GP is able to produce a clear strategy and implementation plan referencing climate-related metrics and long-term goal setting; the strategy is informed by GHG emissions data measured with robust methodology at the portfolio company level</p>
Risk Management	<p>No framework or process identified for tracking and managing climate-related risks</p>	<p>Ad-hoc consideration and responsiveness to major influences such as current regulations and extreme weather events with decisions based on historical data</p>	<p>GP includes climate risk as a factor in pre-acquisition due diligence (inclusive of investment committee deliberation) and identifies portfolio holdings with the highest exposure</p> <p>GP monitors climate risks that may affect valuations based on material climate indicators and scenario analysis</p>	<p>There is a formal process for assessing and managing climate risks and opportunities led by a dedicated team of experts</p> <p>Climate considerations are a core part of portfolio company management strategy</p>

ESG ASSESSMENT FRAMEWORK: CLIMATE SUPPLEMENT

COMPONENT	NOT PRESENT	DEVELOPING	INTERMEDIATE	ADVANCED
Metrics and Targets	No process for identifying or collecting targeted, climate-related KPIs and no climate-based reporting	Ad-hoc (often anecdotal) reporting on one or more climate-related metrics	<p>GP is able to provide emissions reporting, though portfolio coverage and data may be incomplete (for example, scopes 1 & 2 only) or rely on a combination of estimates and actuals, while making directional progress towards more robust collection year over year</p> <p>GP also conducts materiality-based assessments to identify and report on additional material KPIs on an annual basis and sets objectives to manage these KPIs</p>	<p>Building upon "Intermediate," GP sets emissions reduction targets (validated by a third party such as SBTi) aligned with climate science for its portfolio companies, supports/works with portfolio companies to help them integrate decarbonization strategies into their business plans, and reports annually on progress towards these targets</p> <p>Through these targets, the GP shows ambition for the portfolio to become net zero by or before 2050, with a capability for capacity building across portfolio companies</p> <p>Metrics collected and reported to LPs are more complete (for example: reporting on all scopes), accurate (for example: audited or verified by a third-party), and include most, if not all portfolio companies for more recent vintages</p>

Note: The Private Markets Decarbonization Roadmap, developed by Initiative Climat International (iCI) and the Sustainable Markets Initiative's Private Equity Task Force, provides a framework by which a GP can communicate decarbonization progress to LPs at the portfolio company level. The ESG Data Convergence Initiative (EDCI) provides a template for reporting scopes 1, 2, and 3 at the portfolio company level.

WORKSHEET: ESG ASSESSMENT FRAMEWORK

The ESG Assessment Framework can help LPs evaluate GP responses to due diligence questionnaires and was created with the understanding that many LPs are already using ILPA's DDQ as a point of reference.

This worksheet was created for use in tandem with the Framework to help LPs map GP responses to corresponding sections of the ILPA DDQ. It may also be used to take notes and/or assign scores to the quality of a GP's response. ILPA has intentionally forgone assigning numerical scores to each category because the relative weighting and score assigned can vary greatly by organization.

POLICIES AND COMMITMENTS TO STANDARDS

COMPONENT	DDQ LOCATION	NOTES
Status of Current Policy	ESG Policy - 1.29, 19.1.1	
Approach to Policy Review	Policy Review - 19.1.1	
Industry Standards and Best Practices	Formal Commitments - 19.1.2	
Contractual Commitments	Contractual Commitments - 19.2.1	

GOVERNANCE

COMPONENT	DDQ LOCATION	NOTES
ESG Ownership	ESG Ownership/Oversight - 1.4, 1.5, 19.1.3 Investment Committee - 2.13, 19.3.3	
Capacity Building and Training	Training - 9.8, 9.8.1, 19.1.5, 19.4.2	

WORKSHEET: ESG ASSESSMENT FRAMEWORK, CONTINUED

COMMUNICATIONS AND REPORTING

COMPONENT	DDQ LOCATION	NOTES
Approach to Communication	Communication - 2.11, 19.5.1, 19.5.2, 19.5.3	
Incident Reporting	Incident Disclosure - 19.5.3	
KPIs and Reporting	Materiality - 19.3.1 KPIs and Reporting - 19.4.5, 19.4.6, 19.5.1, 19.5.2, 19.5.3	

INVESTMENT PROCESS

COMPONENT	DDQ LOCATION	NOTES
Due Diligence	Due Diligence - 19.3.1, 19.3.2, 19.3.3	
Post-Investment Management	Post-Investment - 19.4.1, 19.4.2, 19.4.3, 19.4.4, 19.4.5, 19.4.6, 19.4.7, 19.4.8, 19.4.9	
Exit & After Sale	Exit - 19.4.7, 19.4.8	

WORKSHEET: DE&I SUPPLEMENT

RESPONSIVENESS TO DE&I	COMPONENT	DDQ LOCATION	NOTES
	Policies and Governance	<p>Policies - 1.29, 20.4, 20.5, 20.6, 20.7, 20.12, 20.12.1, 20.13, 20.15</p> <p>DE&I Ownership/Oversight - 1.4, 1.5, 1.24, 1.24.1, 1.26, 1.26.1, 2.13, 20.14, 20.17</p>	
	Recruiting	Recruiting - 20.4, 20.7, 20.8, 20.9, 20.21	
	Employee Engagement	Employee Engagement - 20.4, 20.10, 20.11, 20.14, 20.15, 20.16, 20.21	
	Diversity Metrics at GP Level	<p>GP Level Diversity Metrics - 20.2, 20.2.1</p> <p>ILPA Diversity Metrics Template is provided in DDQ Appendix A</p>	
	GP Engagement and Disclosure at the Portfolio Company Level	<p>Portfolio Company Diversity Metrics - 20.3, 20.3.1</p> <p>ILPA Diversity Metrics Template is provided in DDQ Appendix A</p>	

WORKSHEET: CLIMATE SUPPLEMENT

RESPONSIVENESS TO CLIMATE RISKS & OPPORTUNITIES

COMPONENT	DDQ LOCATION	NOTES
Governance	Climate Ownership/Oversight - 1.4, 1.5, 2.13, 19.1.2, 19.1.3, 19.3.3 Training - 9.8, 9.8.1, 19.1.5, 19.4.2 Monitoring - 19.4.1, 19.4.2, 19.4.3, 19.4.4, 19.4.5, 19.4.6	
Strategy	Strategy - 19.1.2, 19.3.1, 19.3.2, 19.4.3	
Risk Management	Risk Management - 19.1.3, 19.3.1, 19.3.2, 19.4.2, 19.4.3, 19.4.4, 19.6.2	
Metrics and Targets	Materiality - 19.3.1 KPIs and Reporting - 19.4.5, 19.4.6, 19.5.1, 19.5.2, 19.5.3, 19.6.1, 19.6.2, 19.6.3	



ACKNOWLEDGEMENTS

ILPA would like to thank its ESG Assessment Framework Working Groups, whose expertise, input and time make this initiative possible. ILPA would also like to thank all who submitted feedback, recommendations and questions to improve the Framework and ensure its continued relevance to the market.

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