




LEA 02	Mandatory	Page 123
Type of engagement	Reason for interaction	
Individual/ internal staff engagements	<ul style="list-style-type: none"> To support investment decisions on ESG issues To influence corporate behavior on ESG issues To ensure timely To do the company's internal staff To support investment decisions on ESG issues To ensure timely To do the company's internal staff 	
Collaborative engagements	<ul style="list-style-type: none"> To support investment decisions on ESG issues To influence corporate behavior on ESG issues To ensure timely To do the company's internal staff To support investment decisions on ESG issues To ensure timely To do the company's internal staff 	
Service provider engagements	<ul style="list-style-type: none"> To support investment decisions on ESG issues To influence corporate behavior on ESG issues To ensure timely To do the company's internal staff To support investment decisions on ESG issues To ensure timely To do the company's internal staff 	

RI TRANSPARENCY REPORT 2018

DDJ Capital Management, LLC

OO 01	Mandatory	Gateway/Peering	General
-------	-----------	-----------------	---------

OO 01.1 Select the services and funds you offer

Fund management

% of assets under management (AUM) in ranges

<10%

10-50%

>50%

Fund of funds, manager of managers, sub-advised products

Other, specify

OO 02	Mandatory	Peering	General
-------	-----------	---------	---------

OO 02.1 Select the location of your organisation's headquarters.

United States

OO 02.2 Indicate the number of countries in which you have offices (including your headquarters).

1

2-5

6-10

>10

OO 02.3 Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

57

OO 03	Mandatory	Descriptive	General
-------	-----------	-------------	---------

OO 03.1 Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

Yes

No

OO 04	Mandatory	Gateway/Peering	General
-------	-----------	-----------------	---------

OO 04.1 Indicate the year end date for your reporting year.

31/12/2017

OO 04.2 Indicate your total AUM at the end of your reporting year, Exclude subsidiaries you have chosen not to report on and any advisory/execution only assets.

Total AUM

7,831,220,701 USD

7,831,220,701 USD

OO 05	Mandatory to Report, Voluntary to Disclose	Gateway	General
-------	--	---------	---------

OO 05.1 Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes:

	Internally managed (%)	Externally managed (%)
Listed equity	0	0
Fixed income	>50%	0
Private equity	0	0
Property	0	0
Infrastructure	0	0
Commodities	0	0
Hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0

Cash	0	0
Other (1), specify	0	0
Other (2), specify	0	0

If you respond 'Other (1)', specify for Internally Managed
Not applicable

If you respond 'Other (2)', specify for Internally Managed
Not applicable

If you respond 'Other (1)', specify for Externally Managed
Not applicable

If you respond 'Other (2)', specify for Externally Managed
Not applicable

OO 05.2 Indicate whether your organisation uses fiduciary managers.
 Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.
 No, we do not use fiduciary managers.

OO 06 Mandatory Descriptive General

OO 06.1 Select how you would like to disclose your asset class mix.
 as percentage breakdown
 as broad ranges

OO 06.3 Provide contextual information on your AUM asset class split. [Optional]
Not Applicable

OO 07 Mandatory to Report, Voluntary to Disclose Gateway General

OO 07.1 Provide to the nearest 5% the percentage breakdown of your Fixed Income AUM at the end of your reporting year, using the following categories.
Private

OO 09 Mandatory to Report, Voluntary to Disclose Peering General

OO 09.1 Indicate the breakdown of your organisation's AUM by market.
Private

OO 09.2 Additional information. [Optional]
Private

OO 10 Mandatory Gateway General

OO 10.1 Select the active ownership activities your organisation implemented in the reporting year.
 Fixed income Corporate (non-financial) – engagement
 We engage with companies on ESG factors via our staff, collaborations or service providers.
 We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

OO 11 Mandatory Gateway General

OO 11.1 Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).
 Fixed income - corporate (non-financial)
 We address ESG incorporation.
 We do not do ESG incorporation.

OO 12 Mandatory Gateway General

OO 12.1 Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.
 Core modules
 Organisational Overview
 Strategy and Governance
 RI implementation directly or via service providers

	Direct - Fixed Income		
	<input checked="" type="checkbox"/> Fixed income - Corporate (non-financial)		
	Closing module		
	<input checked="" type="checkbox"/> Closing module		
OO 12.2	Additional information. [Optional]		
	Not Applicable		
OO FI 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
OO FI 01.1	Provide a breakdown of your internally managed fixed income securities by active and passive strategies		
	<i>Private</i>		
OO FI 01.2	Additional information. [Optional]		
	<i>Private</i>		
OO FI 03	Mandatory to Report, Voluntary to Disclose	Descriptive	General
OO FI 03.3	Additional information. [Optional]		
	<i>Private</i>		

SG 01.1 Indicate if you have an investment policy that covers your responsible investment approach.

✓ Yes

SG 01.2 Indicate the components/types and coverage of your policy.

Policy components/types	Coverage by AUM		
<input checked="" type="checkbox"/> Policy setting out your overall approach <input type="checkbox"/> Formalised guidelines on environmental factors <input type="checkbox"/> Formalised guidelines on social factors <input type="checkbox"/> Formalised guidelines on corporate governance factors <input checked="" type="checkbox"/> Asset class-specific RI guidelines <input type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input checked="" type="checkbox"/> Other, specify (1) Proxy Voting Policy <input checked="" type="checkbox"/> Other, specify(2)	<input checked="" type="checkbox"/> Applicable policies cover all AUM <input type="checkbox"/> Applicable policies cover a majority of AUM <input type="checkbox"/> Applicable policies cover a minority of AUM		
<table border="1"> <tr> <td>other (2) description</td> </tr> <tr> <td>Engagement Policy</td> </tr> </table>	other (2) description	Engagement Policy	
other (2) description			
Engagement Policy			

SG 01.3 Indicate if the investment policy covers any of the following

- Your organisation’s definition of ESG and/or responsible investment and it’s relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Climate change and related issues
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

SG 01.4 Describe your organisation’s investment principles and overall investment strategy, and how they consider ESG factors and real economy impact.

DDJ’s research process is designed to generate investment ideas with compelling risk/return profiles across an entire client portfolio. DDJ attempts to identify companies that have a solid core business with sufficient enterprise value coverage and generate sufficient free cash flow to service their fixed income debt obligations. DDJ’s investment approach creates a comprehensive analytical overview of a target company focused on its current and future business prospects.

DDJ integrates various ESG considerations, such as transparency in corporate governance, existence of an independent and experienced board of directors, a commitment to environmental protection and a track record of product safety, into its investment research process. DDJ endeavors to identify material ESG factors that may contribute to financial downside (in particular, significant event risks that can affect an issuer’s creditworthiness), as well as to assess whether or not market pricing adequately reflects those risks with respect to any proposed investment. If DDJ believes that an identified ESG-related risk will have a material negative impact on the business that may disproportionately change the risk/reward profile of such investment, DDJ will factor that assessment into its investment decision-making process (and, accordingly, may not make such investment on behalf of its clients)

SG 01.5 Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

To further enhance the quality of its ESG-related research, DDJ licenses third-party ESG data from a leading provider of such data for many of the companies within DDJ client portfolios as well as its investable universe more broadly. Such information includes both industry-wide and company specific research reports. In addition, the vendor provides ESG ratings for a broad list of corporate credit issuers, including many portfolio holdings of DDJ’s clients. DDJ’s research team can access such ESG ratings within DDJ’s trade order and portfolio management system. Although DDJ does not use these ratings to strictly include or exclude an investment from client accounts, DDJ does instruct its analysts to incorporate such information in their fundamental research process in an effort to better understand the topical ESG-related risks as well as the relative value among existing and prospective investment opportunities.

DDJ, which pursues fixed income investment strategies, believes that issuer engagement as a debt holder tends to be more indirect when compared to that of an equity owner. In the high yield market, DDJ would like to see more robust ESG disclosures and increased transparency, and to further this objective, seeks to influence new issue bond indentures when possible (e.g., increased reporting obligations by issuers). DDJ also identifies inconsistencies between its third party ESG vendor research on certain companies and DDJ’s evaluation of those companies. In such cases, DDJ has begun to initiate discussions with both the issuers and with its third party ESG vendor in an effort to improve the quality of the ESG research produced.

DDJ’s active approach to fixed income investing oftentimes includes frequent interaction with company management, as DDJ seeks to keep an open line of communication with respect to actions that could negatively impact the investment made by DDJ on behalf of its clients. In the event that DDJ does not believe that it can advocate for practical change to mitigate a material ESG risk factor, divestment may be warranted. In addition, DDJ implements exclusionary screens on behalf of certain of DDJ’s clients and works with new clients to tailor products that meet their internal requirements (e.g., investment restrictions on issuers associated with the production of Cluster Munitions, Tobacco, etc).

SG 02.1 Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.

Policy setting out your overall approach

URL/Attachment

URL

<http://www.ddjcap.com/ddjcapital-template/documents/pdfs/ddj-responsible-investment-policy-20171231.pdf>

Attachment (will be made public)

Asset class-specific RI guidelines

URL/Attachment

URL

<http://www.ddjcap.com/ddjcapital-template/documents/pdfs/ddj-responsible-investment-policy-20171231.pdf>

Attachment (will be made public)

Screening / exclusions policy

URL/Attachment

URL

<http://www.ddjcap.com/ddjcapital-template/documents/pdfs/ddj-responsible-investment-policy-20171231.pdf>

Attachment (will be made public)

Other, specify (1)

Other, specify (2)

We do not publicly disclose our investment policy documents

SG 02.2 Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.

Your organisation's definition of ESG and/or responsible investment and it's relation to investments

URL/Attachment

URL

<http://www.ddjcap.com/ddjcapital-template/documents/pdfs/ddj-responsible-investment-policy-20171231.pdf>

Attachment

Your investment objectives that take ESG factors/real economy influence into account

URL/Attachment

URL

<http://www.ddjcap.com/ddjcapital-template/documents/pdfs/ddj-responsible-investment-policy-20171231.pdf>

Attachment

Governance structure of organisational ESG responsibilities

URL/Attachment

URL

<http://www.ddjcap.com/ddjcapital-template/documents/pdfs/ddj-responsible-investment-policy-20171231.pdf>

Attachment

ESG incorporation approaches

URL/Attachment

URL

<http://www.ddjcap.com/ddjcapital-template/documents/pdfs/ddj-responsible-investment-policy-20171231.pdf>

Attachment

Active ownership approaches

URL/Attachment

URL

<http://www.ddjcap.com/ddjcapital-template/documents/pdfs/ddj-responsible-investment-policy-20171231.pdf>

Attachment

Reporting

URL/Attachment

URL

<http://www.ddjcap.com/ddjcapital-template/documents/pdfs/ddj-unpri-transparency-report-20170720.pdf>

Attachment

Climate-related issues

We do not publicly disclose any investment policy components

SG 02.3 Indicate if your organisation's investment principles, and overall investment strategy is publicly available

Yes

<http://www.ddjcap.com/ddjcapital-template/documents/pdfs/ddj-responsible-investment-policy-20171231.pdf>

No

SG 02.4 Additional information [Optional].

Not Applicable

SG 03 **Mandatory** **Core Assessed** **General**

SG 03.1 Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

Yes

SG 03.2 Describe your policy on managing potential conflicts of interest in the investment process.

DDJ generally considers a conflict of interest to arise when there exists a set of circumstances that creates a risk that professional judgment or actions regarding a primary interest (e.g., client interest) will be unduly influenced by a secondary interest (e.g., DDJ or personal interest). Such potential conflicts of interest include valuing illiquid or otherwise hard-to-price assets; regulating personal trading by DDJ employees; achieving best execution of trades; and allocating of investment opportunities amongst client accounts. DDJ believes that the compliance policies and procedures within its compliance manual are designed to address these potential conflicts of interests that may arise in the ordinary course of DDJ's investment management activities. The effectiveness of such policies and procedures is also reviewed periodically by DDJ's compliance personnel in connection with the firm's annual compliance review conducted pursuant to rules promulgated by the Securities and Exchange Commission under the Investment Advisers Act of 1940, as amended. Although numerous DDJ personnel share responsibility for managing these potential conflicts of interest, the firm's chief compliance officer is responsible for overseeing the compliance policies and procedures contained within the compliance manual.

No

SG 03.3 Additional information. [Optional]

Not Applicable

SG 04 **Voluntary** **Descriptive** **General**

SG 04.1 Indicate if your organisation has a process for identifying and managing incidents that occur within portfolio companies.

Private

SG 04.2 Describe your process on managing incidents

Private

SG 05 **Mandatory** **Gateway/Core Assessed** **General**

SG 05.1 Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.

Quarterly or more frequently

Biannually

Annually

Less frequently than annually

Ad-hoc basis

It is not set/reviewed

SG 05.2 Additional information. [Optional]

Not Applicable

SG 06 **Voluntary** **Descriptive** **General**

SG 06.1 List the main responsible investment objectives that your organisation set for the reporting year.

Private

SG 06.2 Additional information.

Private

SG 07 **Mandatory** **Core Assessed** **General**

SG 07.1 Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment.

Roles present in your organisation

Board members or trustees

Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee

- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
 - Chief Compliance Officer
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Portfolio managers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- ESG portfolio manager
- Investment analysts
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Dedicated responsible investment staff
- External managers or service providers
- Investor relations
- Other role, specify (1)

Other description (1)

Director of Analytics

- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment
- Other role, specify (2)

Other description (2)

Senior Compliance Analyst

- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment

SG 07.2 For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.

DDJ's management operating committee, which is the committee responsible for overseeing the firm's operations, has tasked the DDJ investment review committee, with input from cross-functional groups, as the internal body responsible for monitoring and reviewing ESG processes, ESG exposures and the scoring of portfolio investments. Such committee comprises six senior members of DDJ's investment team, including the firm's dedicated in-house transactional attorney, and provides a structured forum to discuss existing holdings, industry news, trends, new investment ideas, and portfolio level risk exposures.

On a monthly basis, DDJ's analytics team provides various risk and exposure measurements on an absolute, benchmark relative and strategy relative basis to the investment review committee for review. Such reporting also periodically includes a review of ESG exposures across client portfolios on a firm-wide basis.

Finally, DDJ has established an internal ESG working group, which is a cross-functional group tasked with formulating ESG policies, procedures and goals, and with working with the third party ESG research provider and monitoring the quality of data and analysis of the third party data provided by the third party ESG vendor.

SG 07.3 Indicate the number of dedicated responsible investment staff your organisation has.

0

SG 07.4 Additional information. [Optional]

Not Applicable

SG 08	Voluntary	Additional Assessed	General
-------	-----------	---------------------	---------

SG 08.1 Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.

Private

SG 08.3 Provide any additional information on your organisation's performance management, reward and/or personal development processes in relation to responsible investment.

Private

SG 09	Mandatory	Core Assessed	PRI 4,5
-------	-----------	---------------	---------

SG 09.1 Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.

Principles for Responsible Investment

Your organisation's role in the initiative during the reporting period (see definitions)

Basic

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Not Applicable

- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AFIC – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change
- CDP Forests
- CDP Water
- CFA Institute Centre for Financial Market Integrity
- Code for Responsible Investment in SA (CRISA)
- Code for Responsible Finance in the 21st Century
- Council of Institutional Investors (CII)
- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- ESG Research Australia
- EVCA – Responsible Investment Roundtable
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- Institutional Investors Group on Climate Change (IIGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify

SG 10 **Mandatory** **Core Assessed** **PRI 4**

SG 10.1 Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

Yes

SG 10.2 Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.

- Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)
- Provided financial support for academic or industry research on responsible investment
- Provided input and/or collaborated with academia on RI related work
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- Spoke publicly at events and conferences to promote responsible investment

Description

MBA Women in Investing Conference in November 2017.

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI
- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)
- Wrote and published articles on responsible investment in the media
- A member of PRI advisory committees/ working groups, specify
- On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
- Other, specify

specify description

Sponsoring the MBA Women in Investing Conference in November 2017.

Description

Not Applicable

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

No

SG 10.3 Describe any additional actions and initiatives that your organisation has taken part in during the reporting year to promote responsible investment [Optional]

DDJ sponsored the MBA Women in Investing Conference in November 2017, which is a conference designed to educate MBA women about career opportunities within the investment management field. Several DDJ investment professionals participated in the event, which we believe promotes equality and diversity in a field that is still largely dominated by men. In addition, at this conference, DDJ's CEO and a research analyst spoke publicly about responsible investing, as well as how our firm both examines ESG risk factors in the context of fundamental analysis of investments and generates new investment ideas.

SG 11	Voluntary	Additional Assessed	PRI 4,5,6
-------	-----------	---------------------	-----------

SG 11.1 Indicate if your organisation - individually or in collaboration with others - conducted dialogue with public policy makers or regulators in support of responsible investment in the reporting year.

Private

SG 11.4 Provide a brief description of the main topics your organisation has engaged with public policy-makers or regulators on.

Private

SG 12	Mandatory	Core Assessed	PRI 4
-------	-----------	---------------	-------

SG 12.1 Indicate whether your organisation uses investment consultants.

- Yes, we use investment consultants
- No, we do not use investment consultants.

SG 12.7 Additional information [Optional].

Not Applicable

SG 13	Mandatory	Descriptive	PRI 1
-------	-----------	-------------	-------

SG 13.1 Indicate if your organisation executes scenario analysis and/or modelling in which the risk profile of future ESG trends at portfolio level is calculated.

- We execute scenario analysis which includes factors representing the investment impacts of future environmental trends
- We execute scenario analysis which includes factors representing the investment impacts of future social trends
- We execute scenario analysis which includes factors representing the investment impacts of future governance trends
- We consider scenario analysis that includes factors representing the investment impacts of future climate-related risks and opportunities
- We execute other scenario analysis, specify
- We do not execute such scenario analysis and/or modelling

SG 13.3	Additional information. [OPTIONAL]												
	Not Applicable												
SG 14	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1										
SG 14.1	Describe the process used to identify short, medium and long-term risks and opportunities that could have a material impact on your organisation and its activities.												
	Private												
SG 14.2	Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following you act on.												
	Private												
SG 14.6	Additional information [Optional]												
	Private												
SG 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1										
SG 15.1	Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.												
	Private												
SG 18	Voluntary	Descriptive	General										
SG 18.1	Indicate whether any specific features of your approach to responsible investment are particularly innovative.												
	Private												
SG 18.3	Additional information.												
	Private												
SG 19	Mandatory	Core Assessed	PRI 6										
SG 19.1	Indicate whether your organisation proactively discloses asset class specific information. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.												
	Fixed income												
	Do you disclose?												
	<input type="radio"/> We do not disclose to either clients/beneficiaries or the public. <input type="radio"/> We disclose to clients/beneficiaries only. <input checked="" type="radio"/> We disclose to the public												
	The information disclosed to clients/beneficiaries is the same												
	<input checked="" type="radio"/> Yes <input type="radio"/> No												
	<table border="1"> <thead> <tr> <th colspan="2">Disclosure to public and URL</th> </tr> </thead> <tbody> <tr> <td colspan="2">Disclosure to public and URL</td> </tr> <tr> <td colspan="2"> <input type="radio"/> Broad approach to RI incorporation <input checked="" type="radio"/> Detailed explanation of RI incorporation strategy used </td> </tr> <tr> <td colspan="2">Annually</td> </tr> <tr> <td colspan="2">http://www.ddjcap.com/ddjcapital-template/documents/pdfs/ddj-responsible-investment-policy-20171231.pdf</td> </tr> </tbody> </table>			Disclosure to public and URL		Disclosure to public and URL		<input type="radio"/> Broad approach to RI incorporation <input checked="" type="radio"/> Detailed explanation of RI incorporation strategy used		Annually		http://www.ddjcap.com/ddjcapital-template/documents/pdfs/ddj-responsible-investment-policy-20171231.pdf	
Disclosure to public and URL													
Disclosure to public and URL													
<input type="radio"/> Broad approach to RI incorporation <input checked="" type="radio"/> Detailed explanation of RI incorporation strategy used													
Annually													
http://www.ddjcap.com/ddjcapital-template/documents/pdfs/ddj-responsible-investment-policy-20171231.pdf													
SG 19.2	Additional information [Optional]												
	Not Applicable												

FI 01	Mandatory	Gateway	PRI 1
FI 01.1	Indicate 1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and 2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to.		
Corporate (non-financial)	Screening alone	0	
	Thematic alone	0	
	Integration alone	100	
	Screening + integration strategies	0	
	Thematic + integration strategies	0	
	Screening + thematic strategies	0	
	All three strategies combined	0	
	No incorporation strategies applied	0	
FI 01.2	Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.		
<p>DDJ employs the integration approach, whereby ESG considerations and risk factors are incorporated into DDJ's fundamental, bottom-up investment process. DDJ endeavors to identify material ESG factors that may contribute to financial downside, as well as to assess whether or not market pricing adequately reflects those risks with respect to any proposed investment. If the DDJ investment team believes that an identified ESG-related risk will have a material negative impact on the business that may disproportionately change the risk/reward profile of such investment, DDJ will factor that assessment into its investment decision-making process (and, accordingly, may not make such investment on behalf of its clients). DDJ believes that integrating ESG factors into its investment process in this manner allows for deeper insight into critical risk factors, including exogenous risks that may not be typically exposed in a traditional business analysis model, ultimately resulting in sounder investment decisions on behalf of its clients. Upon request for selected client mandates, DDJ also employs exclusionary screening with respect to certain investments in particular issuers or industries.</p>			
FI 01.3	Additional information [Optional].		
Not Applicable			

FI 02	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 1
FI 02.1	Indicate which ESG factors you systematically research as part of your analysis on issuers.		
Private			
FI 02.2	Indicate what format your ESG information comes in and where you typically source it		
Private			
FI 02.3	Provide a brief description of the ESG information used, highlighting any differences in sources of information across your ESG incorporation strategies.		
Private			
FI 02.4	Additional information. [Optional]		
Private			

FI 03	Mandatory	Additional Assessed	PRI 1
FI 03.1	Indicate how you ensure that your ESG research process is robust:		
<input checked="" type="checkbox"/> Issuers are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies <input checked="" type="checkbox"/> Issuer information and/or ESG ratings are updated regularly to ensure ESG research is accurate <input type="checkbox"/> Internal audits of ESG research are undertaken in a systematic way <input checked="" type="checkbox"/> ESG analysis is benchmarked for quality against other providers <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above			
FI 03.2	Describe how your ESG information or analysis is shared among your investment team.		
<input checked="" type="checkbox"/> ESG information is held within a centralised database and is accessible to all investment staff <input checked="" type="checkbox"/> ESG information is a standard item on all individual issuer summaries, 'tear sheets', 'dashboards' or similar documents <input type="checkbox"/> Investment staff are required to discuss ESG information on issuers as a standard item during investment committee meetings <input checked="" type="checkbox"/> Records capture how ESG information and research was incorporated into investment decisions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above			

FI 03.3	Additional information. [Optional]
Not Applicable	

FI 11	Mandatory	Descriptive	PRI 1
-------	-----------	-------------	-------

FI 11.1	Describe your approach to integrating ESG into traditional financial analysis.
---------	--

ESG considerations, such as transparency in corporate governance, existence of an independent and experienced board of directors, a commitment to environmental protection and a track record of product safety, are integrated into DDJ's fundamental, bottom-up investment process. More specifically, within its bottom-up fundamental analysis of each fixed income investment opportunity, DDJ endeavors to identify material ESG factors that may contribute to financial downside (in particular, significant event risks that can affect an issuer's creditworthiness and therefore its ability to meet its ongoing fixed income principal and interest obligations), as well as to assess whether or not market pricing adequately reflects those risks with respect to any proposed investment. If the DDJ research analyst, in consultation with the portfolio manager, believes that an identified ESG-related factor will have a material positive or negative impact on the business that may disproportionately change the risk/reward profile of such investment, DDJ will factor that assessment into its investment decision-making process (and, accordingly, may not make such investment on behalf of its clients). DDJ believes that integrating ESG considerations into its investment process in this manner allows for deeper insight into critical risk factors, including exogenous factors not typically exposed in a traditional business analysis model, ultimately resulting in sounder investment decisions on behalf of its clients.

To further enhance the quality of its ESG-related research, DDJ licenses third-party ESG data from a leading provider of such data for thousands of companies worldwide. Such information includes both industry-wide and company-specific research reports. In addition, the vendor provides ESG ratings for a broad list of corporate credit issuers, including many portfolio holdings of DDJ's clients. DDJ's research team can access such ESG ratings within DDJ's trade order and portfolio management system. Although DDJ does not use these ratings to strictly include or exclude an investment from client accounts, DDJ does instruct its analysts to incorporate such information in their fundamental research process in an effort to better understand the topical ESG-related factors as well as the relative value among existing and prospective investment opportunities.

DDJ believes that issuer engagement as a debt-holder tends to be more indirect when compared to that of an equity owner. While an equity owner can ultimately vote (and replace) the members of an issuer's board of directors, the opportunities to actively engage as a fixed income investor tend to occur around events such as new debt issuances and corporate restructurings. In such cases, depending on the size of the DDJ position relative to the total class of debt, DDJ may be able to exert some degree of influence over an issuer, particularly with respect to governance and reporting issues. DDJ believes that adherence to strong governance principles is an important feature of the companies in which its clients invest. DDJ's active approach to fixed income investing generally includes frequent interaction with company management, as DDJ seeks to keep an open line of communication with respect to actions that could negatively impact the investment made by DDJ on behalf of its clients. While DDJ does not always agree with the policies implemented by an issuer's management, DDJ believes that remaining active and engaged will typically result in more constructive, long-term relationships surrounding topical issues, including governance concerns, and that such an approach ultimately benefit its clients. In the event that issuer engagement is not successful, and DDJ does not believe that it can advocate for practical change, divestment may be warranted, depending on the nature of the ESG factor and the corresponding effect on the investment's risk/reward profile. DDJ has actively engaged with management of its portfolio companies since the inception of the firm, and expects that it will make an effort to increase ESG engagement over time.

FI 11.2	Describe how your ESG integration approach is adapted to each of the different types of fixed income you invest in.
---------	---

Corporate (non-financial)
DDJ focuses on the Corporate (non-financial) sector only, and as such, responses provided in 11.1 apply to this section as well.

FI 11.3	Additional information [OPTIONAL]
Not Applicable	

FI 12	Mandatory	Core Assessed	PRI 1
-------	-----------	---------------	-------

FI 12.1	Indicate how ESG information is typically used as part of your investment process.
---------	--

	Corporate (non-financial)
ESG analysis is integrated into fundamental analysis	<input checked="" type="checkbox"/>
ESG analysis is integrated into security weighting decisions	<input checked="" type="checkbox"/>
ESG analysis is integrated into portfolio construction decisions	<input checked="" type="checkbox"/>
ESG analysis is a standard part of internal credit ratings or assessment	<input type="checkbox"/>
ESG analysis for issuers is a standard agenda item at investment committee meetings	<input checked="" type="checkbox"/>
ESG analysis is regularly featured in internal research notes or similar	<input type="checkbox"/>
ESG analysis is a standard feature of ongoing portfolio monitoring	<input type="checkbox"/>
ESG analysis features in all internal issuer summaries or similar documents	<input type="checkbox"/>
Other, specify	<input type="checkbox"/>

FI 12.2	Additional information [OPTIONAL]
Not Applicable	

FI 13	Mandatory	Additional Assessed	PRI 1
-------	-----------	---------------------	-------

FI 13.1	Indicate the extent to which ESG issues are reviewed in your integration process.
---------	---

	Environment	Social	Governance
--	-------------	--------	------------

Corporate (non-financial)	Environmental	Social	Governance
	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all

FI 13.2 Please provide more detail on how you review E, S and G factors in your integration process.

Corporate (non-financial)

Environmental, Social and/or Governance ("ESG") issues are integrated in DDJ's fundamental, bottom-up investment process. DDJ believes that governance in particular is a significant ESG risk that applies to all high yield investments, and accordingly DDJ attempts to mitigate this risk on an issuer-by-issuer basis throughout all of its high yield portfolios. DDJ believes that the continuous monitoring of existing positions allows DDJ to incorporate governance risk into its ongoing investment analysis and that this approach is the best way for DDJ to mitigate such risk (e.g., by divesting to the extent an ESG-related risk becomes too severe to justify the potential reward).

When examining environmental and social risks, DDJ believes that the magnitude and source of risks can vary from one sector to another; however, certain risk themes oftentimes emerge in issuers within one sector or across several sectors. For example, in the Basic Materials and Energy sectors, DDJ is focused on environmental factors affecting all issuers; including (where applicable) the consequences of the switch from coal to natural gas. In addition, the increased viability of renewable energy sources has caused DDJ to conduct a careful review of fossil fuel dependent companies in these sectors. Meanwhile, in the Healthcare industry, DDJ is focused on social issues. In particular, DDJ evaluates the risk of high-cost service providers and of pharmaceuticals companies dependent on high-cost drugs. DDJ has found industry and thematic research provided by a third-party ESG research provider to be helpful in identifying themes that could affect the long-term value of investments.

FI 13.3 Additional information.[OPTIONAL]

Not Applicable

FI 15 Mandatory to Report, Voluntary to Disclose Core Assessed PRI 2

FI 15.1 Indicate the proportion of your fixed income assets on which you engage. Please exclude any engagements carried out solely in your capacity as a shareholder.

Private

FI 15.3 Additional information.[OPTIONAL]

Private

FI 16 Mandatory to Report, Voluntary to Disclose Additional Assessed PRI 1,2

FI 16.1 Indicate how you typically engage with issuers as a fixed income investor, or as both a fixed income and listed equity investor. (Please do not include engagements where you are both a bondholder and shareholder but engage as a listed equity investor only.)

Private

FI 16.2 Indicate how your organisation prioritises engagements with issuers

Private

FI 16.3 Indicate when your organisation conducts engagements with issuers.

Private

FI 16.4 Indicate how your organisation conducts engagements with issuers.

Private

FI 16.5 Indicate what your organisation conducts engagements with issuers on.

Private

FI 16.6 Indicate how your organisation shares the outcomes of the engagements internally.

Private

FI 16.7 Additional information.[OPTIONAL]

Private

FI 17 Mandatory to Report, Voluntary to Disclose Additional Assessed PRI 1,2

FI 17.1 Indicate if your publicly available policy documents explicitly refer to fixed income engagement separately from engagements in relation to other asset classes.

Private

FI 17.3 Additional information [OPTIONAL]

Private

FI 18 Mandatory to Report, Voluntary to Disclose Additional Assessed General

FI 18.1 Indicate whether your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance.

Private

FI 18.2 Describe how your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance. [OPTIONAL]

Private

FI 18.3 Additional information.[OPTIONAL]

Private

FI 19	Voluntary	Descriptive	PRI 1,2
FI 19.1	Provide examples of how your incorporation of ESG analysis and/or your engagement of issuers has affected your fixed income investment outcomes during the reporting year.		
<i>Private</i>			
FI 19.2	Additional information.		
<i>Private</i>			

CM1 01.1	Mandatory	Core Assessed	General												
CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:														
	<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit conducted by internal auditors of the implementation of RI processes and/or RI data that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Whole PRI Transparency Report has been internally verified <input type="checkbox"/> Selected data has been internally verified <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above														
CM1 01.2 & 01.8	Mandatory	Descriptive	Planned assurance of this year's PRI Transparency Report												
CM1 01.2	Do you plan to conduct third party assurance of this year's PRI Transparency report?														
	<input type="radio"/> Whole PRI Transparency Report will be assured <input type="radio"/> Selected data will be assured <input checked="" type="radio"/> We do not plan to assure this year's PRI Transparency report														
CM1 01.3 & 01.9	Mandatory	Descriptive	General												
CM1 01.3	We undertook third party assurance on last year's PRI Transparency Report														
	<input type="radio"/> Whole PRI Transparency Report was assured last year <input type="radio"/> Selected data was assured in last year's PRI Transparency Report <input checked="" type="radio"/> We did not assure last year's PRI Transparency report, or we did not have such a report last year.														
CM1 01.4, 10-12	Mandatory	Descriptive	General												
CM1 01.4	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:														
	<input type="checkbox"/> We adhere to an RI certification or labelling scheme <input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above														
CM1 01.7	Mandatory	Descriptive	General												
CM1 01.7	Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed														
	<input checked="" type="checkbox"/> CEO or other Chief-Level staff <table border="1" style="width: 100%; margin-top: 5px;"> <tr> <td style="width: 20%;"></td> <td>Sign-off or review of responses</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Sign-off</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Review of responses</td> </tr> </table> <input type="checkbox"/> The Board <input checked="" type="checkbox"/> Investment Committee <table border="1" style="width: 100%; margin-top: 5px;"> <tr> <td style="width: 20%;"></td> <td>Sign-off or review of responses</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Sign-off</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Review of responses</td> </tr> </table> <input checked="" type="checkbox"/> Compliance Function <input checked="" type="checkbox"/> RI/ESG Team <input type="checkbox"/> Investment Teams <input type="checkbox"/> Legal Department <input type="checkbox"/> Other (specify)				Sign-off or review of responses	<input type="checkbox"/>	Sign-off	<input checked="" type="checkbox"/>	Review of responses		Sign-off or review of responses	<input checked="" type="checkbox"/>	Sign-off	<input checked="" type="checkbox"/>	Review of responses
	Sign-off or review of responses														
<input type="checkbox"/>	Sign-off														
<input checked="" type="checkbox"/>	Review of responses														
	Sign-off or review of responses														
<input checked="" type="checkbox"/>	Sign-off														
<input checked="" type="checkbox"/>	Review of responses														
CM1 01.13	Additional information for all confidence building measures [OPTIONAL]														
	Not Applicable														

