

The background of the image is a photograph of a large baobab tree in a dry, rocky landscape. The tree has a thick, textured trunk and a dense canopy of green and yellowish leaves. The ground is covered with dark, rounded rocks and some dry grass. In the distance, there are more trees and a clear sky. A large, semi-transparent teal circle is overlaid on the right side of the image, containing the text.

Just Share

**Asset Manager
Responsible
Investment
Benchmark
2025**

ABOUT JUST SHARE

Just Share is a South African non-profit organisation using shareholder activism and responsible investment as mechanisms to advance social and environmental justice. Our research, advocacy and activism are aimed at changing corporate behaviour to accelerate climate action and build a more inclusive, resilient economy.

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Executive Summary

This report assesses the performance of 20 of South Africa's largest asset managers against key standards that reflect best practice for responsible investment across four areas: governance and stewardship, climate change, biodiversity, and social impacts. The report provides overall rankings and presents key findings across the different areas.

This report was researched and produced by Just Share using a survey methodology developed by United Kingdom-based non-profit organisation ShareAction.¹ ShareAction used this methodology to assess the responsible investment performance of 76 of the world's largest asset managers in the fifth edition of ShareAction's *Point of No Returns* report (the ShareAction Report).² These 76 asset managers control over US\$80 trillion of assets.

By using ShareAction's methodology, this report is able to benchmark South Africa's largest asset managers against global best practices for responsible investment. The key standards against which asset managers are assessed are ambitious, but achievable. ShareAction demonstrated that every one of the 20 key standards was met by at least one asset manager assessed in its report.

The ShareAction Report found that the world's largest asset managers are failing to respond effectively to the climate, biodiversity and social crises, while continuing to invest in activities that ensure fossil fuel expansion, environmental degradation and ignore affected communities.

This is also true with respect to South Africa's largest asset managers, many of which have asserted their commitment to responsible investment practices for over 15 years. South Africa is often regarded as a leader in responsible investment practices in emerging markets. However, this report finds that South African asset managers are now lagging in meeting global best practice.

1 <https://shareaction.org/>

2 ShareAction, *Point of No Returns*, 2025.

Our key findings are that:

- Inadequate public disclosure by South African asset managers undermines their responsible investment claims and limits meaningful assessment of their performance.
- South African managers lag behind their global peers in addressing climate change and biodiversity risks. The majority of South African managers have not set science aligned decarbonisation targets, nor have they assessed the biodiversity risk of their portfolios.
- There is a stark disconnect between South African asset managers' claimed intentions on social development and the just transition and their capital allocations. Despite half of the surveyed managers emphasising the importance of a just transition, evidence of this translating into capital allocation shifts remains minimal.
- South African asset managers claim to favour engagement with investee companies over exclusions and divestment, but reported engagements fail to set clear objectives over stipulated timeframes with steps for when engagements fail.

The data in this report is updated to end June 2025. As a result, it is possible that some asset managers may have addressed some of the gaps noted in the interim. Several firms did indicate that they were working on updated policies and processes, but these had not been finalised for the purposes of assessment for this report. The benchmarking process afforded all asset managers the opportunity to provide their own data for review and inclusion. The full benchmark survey methodology is available in [Appendix 2](#).



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How to use this report

This report assesses the performance of 20 of the largest asset managers in South Africa against key standards for responsible investment. The report concentrates on asset managers' policies and practices regarding their investments, and not on their internal operations.

The overall performance of the South African asset managers is summarised in [Table 1](#). For comparison, global manager performance as assessed in the ShareAction Report, is summarised in [Appendix 1](#). Each firm has been awarded a grade depending on how many of the 20 key standards it met. These standards cover the most important pillars of responsible investment across the themes of governance and stewardship, climate, biodiversity, and social impacts. Firms are ranked by grade and then by overall score, which provides an additional level of detail.

The standards provide a concrete overview of how individual firms are performing, and a priority set of recommendations for asset managers to improve their performance. Standards relating to investment policies require that these policies apply to most or all of an asset manager's funds, not only ESG-labelled funds (or similar).

The report methodology, including the process for selecting asset managers, is provided in [Appendix 2](#). Examples are provided in this report of current leading practice which goes beyond the key standards and demonstrates what is possible.

In summary:

- **Asset managers** are encouraged to use this report, and its recommendations, to benchmark their own performance and inform areas for improvement. The key standards should be considered as a minimum set of expectations; leaders should go beyond these.
- **Asset owners and asset consultants** can use the information to assess the performance of asset managers on responsible investment issues and challenge them to improve their approach, using the examples of leading practice as a guide. The findings and key standards can be used to set clear expectations and inform the selection of asset managers.
- **Policy makers** can use the report to identify areas of sector-wide strength and weakness and to determine appropriate policy action to set higher standards for investors and protect the wider public interest. They can also use the examples of leading practice as evidence of what is possible, and to refute arguments that no one in the market is doing this, or that certain measures would be too burdensome.

Table 1: Ranking of South African asset managers

Rank	Asset manager	Grade	Number of key standards achieved	Overall score	Climate Change	Biodiversity	Social Impacts	Governance & Stewardship	Responded to benchmarking survey?
1	Ninety One	D	5	30%					Yes
2	Allan Gray	D	5	25%					Yes
3	Old Mutual Investment Group	D	4	22%					Yes
4	Coronation Fund Managers	E	3	23%					Yes
5	Sanlam Investment Management	E	3	17%					Yes
6	Truffle Asset Management	E	3	16%					Yes
6	Futuregrowth Asset Management	E	2	16%					Yes
7	Prescient Investment Management	E	2	15%					Yes
8	M&G Investments	E	2	14%					Yes
9	STANLIB Asset Management	E	2	13%					Yes
10	Momentum Asset Management	E	1	11%					Yes
10	PSG Asset Management	E	2	11%					Yes
11	Abax Investments	E	1	9%					Yes
11	Camissa Asset Management	E	1	9%					No
11	Foord Asset Management	E	1	9%					Yes
12	Public Investment Corporation	E	1	8%					No
13	Taquanta Asset Managers	F	0	4%					Yes
13	Aluwani Capital Partners	F	0	4%					No
13	Ashburton Investments	F	0	4%					No
14	Fairtree Asset Management	F	0	3%					No

Heatmap key

0%  100%

Numbers rounded up

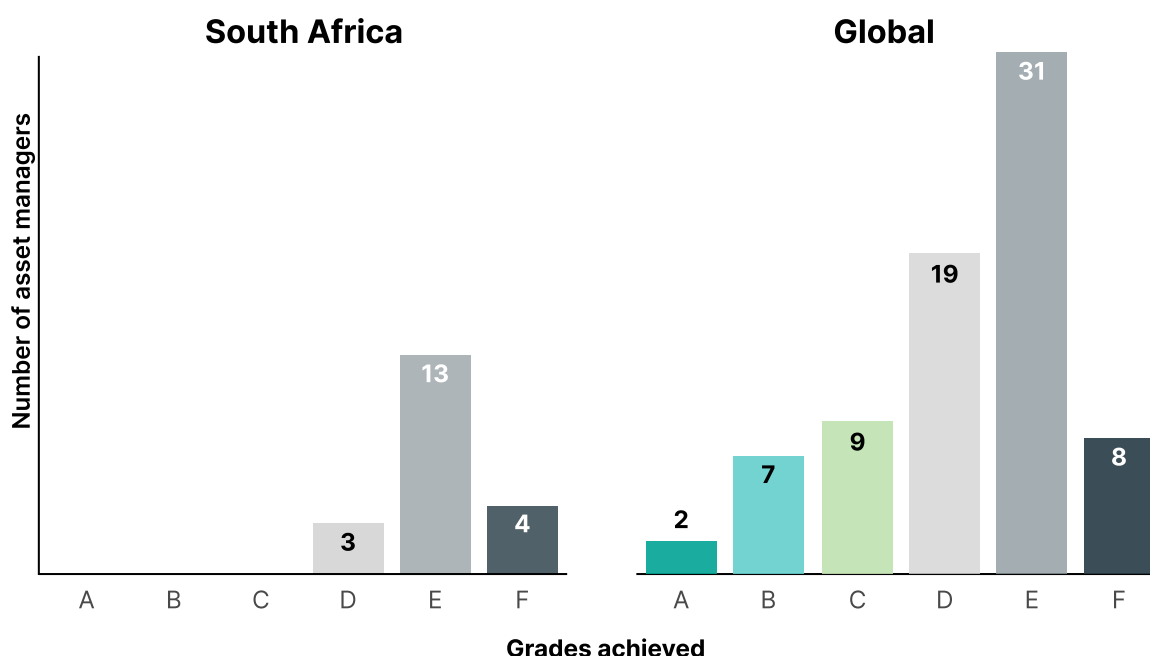


Overall Findings

Finding 1

South African asset managers lag global counterparts

Figure 1: South African asset managers' performance compared with global asset managers, graded from A to F and ranked from best to worst



Responsible investment has formed part of the South African asset manager lexicon for over 15 years. While South Africa is often regarded as a leader in responsible investment practices in emerging markets, this report finds that South African asset managers are lagging behind global best practice.

The ShareAction methodology is designed to be consistent with best practice but set at a level that is achievable and realistic. At least one asset manager in ShareAction's benchmark met each of the 20 standards. The top performers in the ShareAction Report were Robeco and APG Asset Management, which both met 16 of the 20 key standards. They were the only two managers to achieve "A" Grades, with scores of 76% and 75% respectively.

European managers outperformed other regions in the ShareAction Report: the three highest performing asset managers were European. The highest performing non-European asset manager was Japan's Nomura, which received a "C" grade. The largest asset managers in the world, BlackRock, Fidelity Investments, State Street Global Advisors and Vanguard, received "D", "E" or "F" grades.³

³ ShareAction, [Point of No Returns](#), 2025.

The top performing asset manager in the Just Share survey is Ninety One, which received a “D” Grade and a score of 30%. This would have placed Ninety One tied 24th of the 76 global asset managers covered in the global ShareAction Report. Ninety One met only a quarter of the key standards. Comparatively, 10 of the 76 asset managers assessed by ShareAction achieved more than half of the key standards.⁴

The majority (65%) of the assessed South African asset managers received an “E” Grade, for meeting between one and three key standards, while four received an “F” Grade, for failing to meet any of the key standards. Only three asset managers met four or five of the key standards to achieve a “D” grade.

The vast majority (85%) of the South African asset managers surveyed received an “E” or “F” grade, with scores below 25%. By comparison, 51% scored “E” or “F” grades in the global ShareAction Report. These results show that across the sector, South African asset managers are underperforming in comparison to international peers when it comes to responsible investment practices.

Finding 2

Insufficient public disclosure undermines responsible investment claims

A common refrain among South African asset managers is that repeated requests for information about their responsible investment approaches and performance duplicates effort and leads to “questionnaire fatigue”. However, it is clear from this analysis that asset managers are failing to provide sufficient **public disclosure** on critical aspects of responsible investment. This makes it difficult for clients, regulators and other stakeholders to assess performance. It also is likely to contribute to the “questionnaire fatigue” that some asset managers complain about.

If public disclosures were improved, multiple requests for information by different stakeholders could be avoided. Challenges relating to disclosure include asset managers issuing multiple reports covering different aspects of responsible investment; failing to provide sufficient details on critical issues such as engagement objectives, investment restrictions, and voting results; and only presenting limited evidence of their responsible investment approach in their policies. This is in contrast to the many marketing campaigns and website pages claiming that these managers comprehensively integrate responsible investment practices into their investment decision-making.

In some cases, the Principles for Responsible Investment (PRI) Transparency Reports⁵ provide information that is not presented in other public reports, or is inconsistent with other public documents. In others, the examples of company engagements provided in reports did not change or were not updated from year to year.

⁴ ShareAction, *Point of No Returns*, 2025.

⁵ <https://www.unpri.org/signatories/reporting-and-assessment/investor-reporting-framework>

Some asset managers implement responsible investment principles in one asset class, such as alternatives, while failing to apply the same principles across other asset classes, such as equities and fixed income.⁶

Furthermore, none of the top 20 South African asset managers publicly disclose sustainability or responsible investment metrics to clients or potential clients across all portfolios in fact sheets or similar disclosures. This makes it impossible for investors, especially retail investors, to assess and compare the sustainability performance of all portfolios.

While some asset managers provide this information for specific impact or development funds, others do not, despite them doing so for funds in other jurisdictions. For example, Ninety One publicly discloses metrics for certain European domiciled funds (e.g. the Global Environment Fund), but does not provide similar disclosure for its South African feeder funds.

Finding 3

Performance was poor across themes, but worst on biodiversity and social impacts

The survey considered performance across four themes:

- Governance and stewardship;
- Climate change;
- Biodiversity; and
- Social impacts.

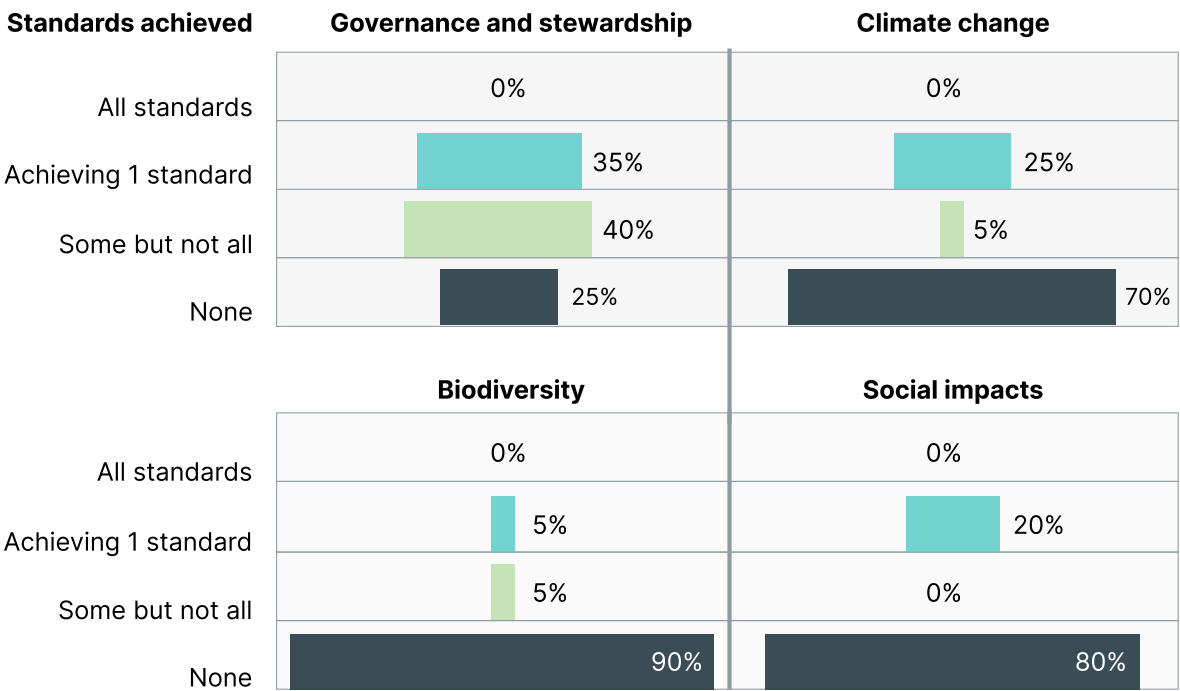
None of the South African asset managers surveyed met all of the key standards across the four themes. Performance for biodiversity was especially poor, followed by performance on the social impacts theme. Of the 20 surveyed asset managers, 90% did not meet any of the key standards for biodiversity and 80% did not meet any of the key standards for social impacts.

Social impact and environmental action – addressing climate change and nature loss – are fundamentally interconnected, rather than competing, priorities. Climate change and biodiversity degradation disproportionately affect the country's most vulnerable communities, exacerbating existing inequalities through impacts on food security, water availability, and economic opportunities.

South African asset managers should adopt strategies that recognise how environmental sustainability and social equity reinforce each other, ultimately delivering stronger long-term risk-adjusted returns while addressing the country's most pressing systemic risks.

⁶ This report considers performance in listed equities and fixed income and, as a result, disclosure relating to other asset classes has not been considered.

Figure 2: Percentage of South African asset managers that met each of the standards across four responsible investment themes



Finding 4

South African portfolios continue to invest in fossil fuels despite climate risks

South African asset managers frequently cite the country’s “small investment universe” and the need for diversification as reasons why they do not have exclusionary investment policies. This is despite the reality that continued investment in fossil fuels is an untenable risk to the economy.

Investments in coal are notably problematic. Coal remains the world’s most polluting fuel, with the highest stranded asset risk. Allocating capital away from fossil fuel resources towards low-carbon alternatives is an existential necessity. Accelerating the phase-out of coal and other fossil fuels is an important part of this process and a significant transitional investment opportunity.⁷

Only seven (35%) of the 20 largest South African asset managers have introduced some form of restriction on investments in fossil fuels. The majority of these restrictions only relate to thermal coal – either in terms of mining or power generation. In several cases, the restrictions only apply to some funds rather than the majority or all of assets under management (AUM). South African capital allocators must review and update their restriction policies and mandates on fossil fuels to support a just transition to a low-carbon, sustainable economy.

7 See: [Civil society response to FutureCoal's false claims about coal](#)

Finding 5

Engagement is weak despite lack of investment restrictions

South African asset managers assert that their commitment to engagement with investee companies compensates for weak or absent investment restrictions. However, the engagement approaches by South Africa's largest asset managers are not sufficiently robust to tackle the structural challenges presented by issues such as climate change and inequality.

Under half (45%) of the asset managers surveyed disclose an example of an escalated engagement on climate, biodiversity or social impacts, with only three demonstrating escalated engagements for more than one theme.

This may be a matter of insufficient disclosure (see [Finding 2](#)). South African asset manager stewardship reports rarely outline clear engagement objectives or timeframes, nor do they often provide full lists of engagements or report on quantitative outcomes or frequency of escalation.

However, lack of robustness is further reflected by the fact that while the majority of the 20 asset managers have an engagement policy, none of these policies meets the key standard, which requires a defined escalation process with timebound escalation triggers and consequences of unsuccessful engagement.

The asset managers in the survey are also failing to set clear public expectations for investee companies with respect to climate change, biodiversity or human rights. This undermines the potential influence that asset managers have and means that engagement strategies are ad hoc rather than systematic in nature.

Finding 6

Responsible investment performance inadequate to address systemic challenges

Overall, the survey showed insufficient action by the country's largest asset managers to address critical structural issues such as climate change, biodiversity loss and inequality. These issues pose significant financial risks, in addition to the obvious environmental and social risks.

In general, the larger asset managers (in terms of assets under management) performed better than the smaller firms. A notable exception was the Public Investment Corporation (PIC) (see [Box 1](#)). However, Truffle's ranking at number six shows that smaller managers are able to perform as well as larger managers.

Without asset managers taking a more ambitious approach, systemic risks will grow. Asset owners and regulators need to take stronger actions in mandating and overseeing asset managers to ensure alignment with regulatory requirements and responsible investment principles.



BOX 1

PIC's inadequate response to systemic risks

With R2.69 trillion in assets under management, the Public Investment Corporation (PIC), South Africa's largest asset manager, occupies a critical position in addressing climate change, biodiversity loss, and inequality through its investment decisions. The PIC is one of the largest and most influential asset managers in Africa and the biggest single investor on the Johannesburg Stock Exchange.⁸

Despite this potential, the PIC achieved an E-grade with a score of only 8% overall, and underperformed across all the responsible investment themes evaluated in this report.⁹ The PIC public disclosures are limited and it continues to invest in fossil fuels with no restrictions or transition plan for its portfolio. It is similarly weak on biodiversity with no policies, commitments or restrictions to reduce negative biodiversity impacts.

The PIC's ability to influence entire sectors through its investment decisions, combined with its developmental mandate, positions it as potentially South Africa's most powerful tool for systemic risk mitigation. It should be acting more decisively to leverage its ownership rights and ensure capital is stewarded towards a just transition.

⁸ PIC, *Integrated Annual Report*, 2024.

⁹ The PIC did not respond to Just Share's invitation to contribute data and insights for this report.



Governance and Stewardship

This chapter considers asset managers' governance with respect to implementing responsible investment practices, and their approach to stewardship.

In the context of responsible investment, stewardship involves asset managers and owners engaging constructively with investee companies to promote sustainable business practices, and safeguard long-term value creation. Stewardship incorporates exercising voting rights at shareholder meetings, engaging in dialogue with company management on material issues, monitoring corporate conduct, and advocating for transparency and accountability. Active stewardship recognises that investors have the power and the responsibility to shape corporate outcomes in ways that benefit not only their clients and beneficiaries, but also society and the environment.

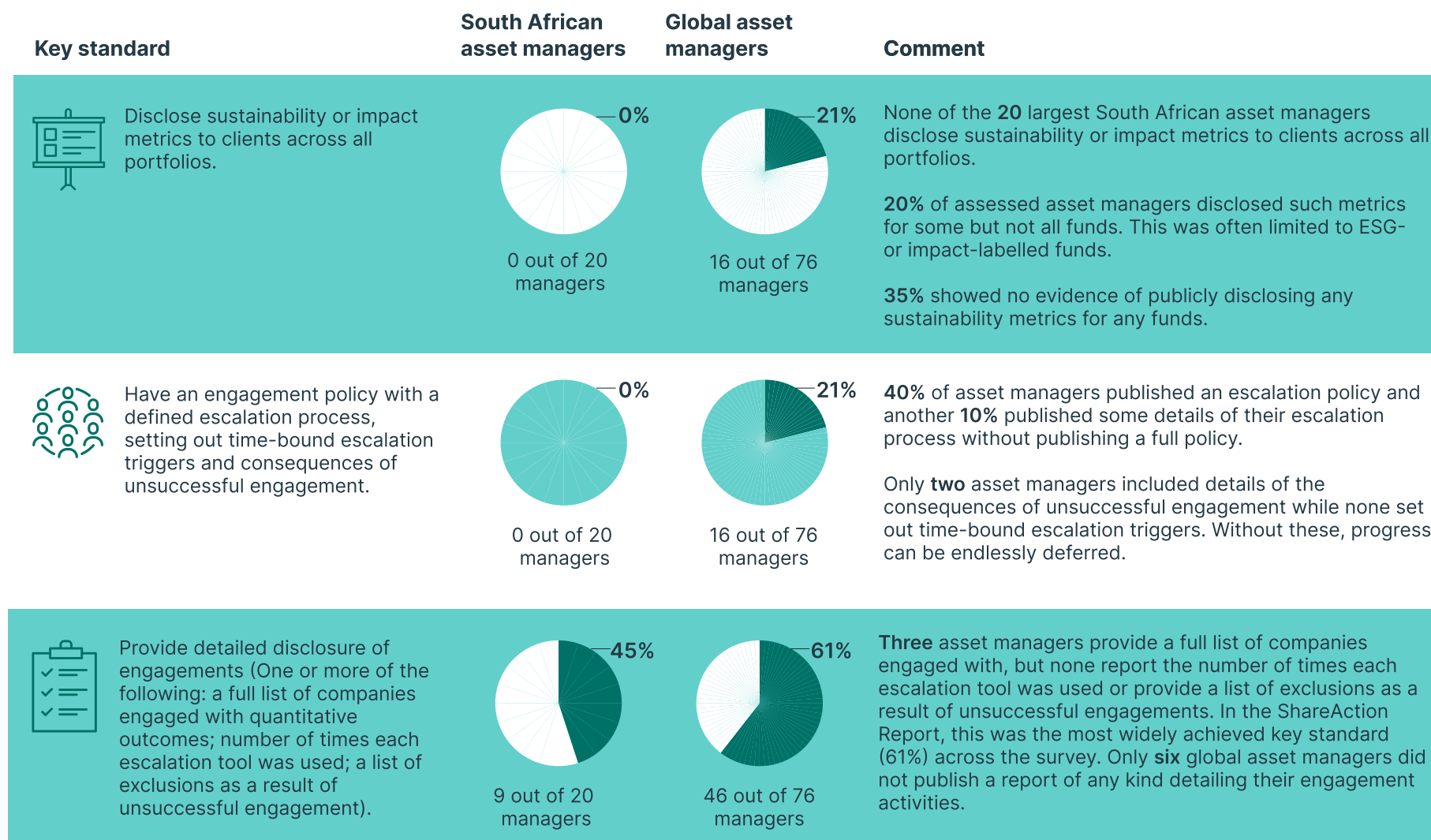
In South Africa, where inequality and environmental issues remain interconnected and urgent concerns, robust stewardship practices are essential to ensuring that investment decisions contribute meaningfully to a just transition to a low-carbon economy.

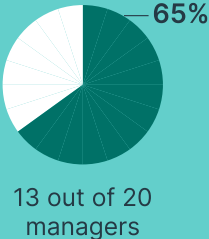
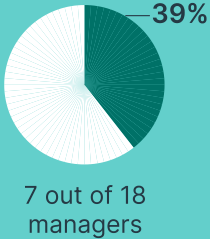




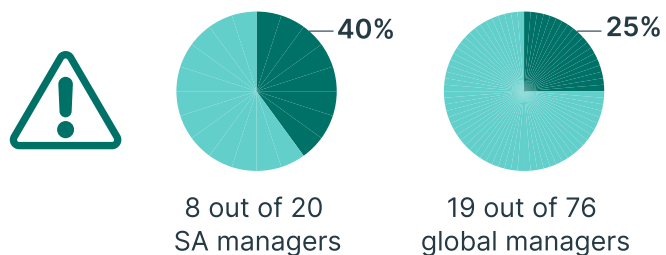
Key Standards

Figure 3: Most funds fail to provide meaningful disclosure on sustainability metrics and engagement

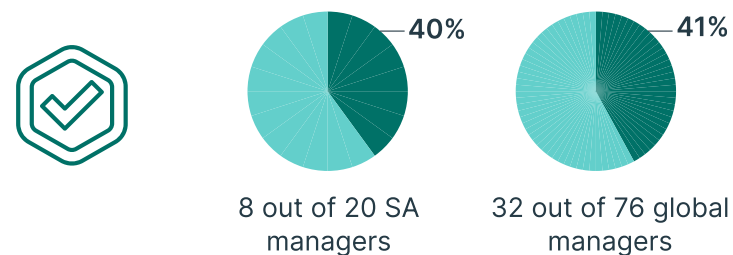


Key standard	South African asset managers	Global asset managers	Comment
 Demonstrated engagement on equities, corporate or sovereign debt since 1 January 2022 regarding responsible investment issues using at least one of the following tactics: making a public-facing statement; filing a shareholder resolution; imposing responsible investment-related conditions on purchasing new issues; refusing to purchase new issues; divesting.	 65% 13 out of 20 managers	 39% 7 out of 18 managers	13 (65%) of the 20 managers reported using specific engagement or escalation tactics in either their Stewardship Reports or PRI Transparency Reports, but these were not possible to verify in several instances. Note: ShareAction compiles an annual proxy voting report that evaluates voting engagement across asset managers. This was not undertaken in the South African study. The ShareAction results for this key standard relate to the 18 asset managers not included in the proxy voting report due to insufficient holdings.

Do NONE of these



Do more than one of these



Finding 7

Disclosure of responsible investment metrics inadequate

Disclosure of sustainability or impact metrics¹⁰ for a portfolio is critical for investors to understand and assess what they are investing in, and to allow for comparison against other portfolios. Greenwashing, where funds claim to be more sustainable than they actually are, has led several jurisdictions to impose rules for sustainability disclosures, especially for ESG- or sustainability-labelled funds. For example, in the European Union, funds classified under Article 8 and Article 9 of the Sustainable Finance Disclosure Regulation (SFDR) must provide specific sustainability indicators. In South Africa, the Financial Sector Conduct Authority (FSCA) has not yet imposed any similar requirements, although it has suggested that it may consider doing so.¹¹

Internationally, according to the ShareAction Report, 21% of asset managers disclosed such metrics for all funds and 57% did so for some funds, although this was often limited to ESG-labelled funds.

None of the 20 South African asset managers publicly disclose to clients the sustainability or impact metrics associated with their investments for all their portfolios via fund fact sheets or similar documents. Only four firms (20%) disclose some sustainability or impact metrics for specific portfolios or strategies.

These are:

- Allan Gray, which discloses high-level carbon accounting metrics for combined local portfolios;
- Futuregrowth, which discloses impact metrics for certain developmental funds;¹²
- Old Mutual Investment Group (OMIG), which discloses relative carbon intensities for its ESG-focused products; and
- Prescient, which discloses metrics such as jobs created and electricity generated for its Clean Energy and Infrastructure Debt Fund.

Nine firms (45%) indicated that they only provide sustainability and/or impact metrics on request. Ninety One discloses sustainability metrics for certain funds, such as the Global Environment Fund, in the UK but not in South Africa. Eight (40%) asset managers do not provide this information at all.

¹⁰ Sustainability and impact metrics include: Aggregate exposure to fossil fuel companies; scope 1 & 2 emissions (intensity or absolute); scope 3 emissions (intensity or absolute); fund coverage in renewable energy; fund coverage with carbon reduction targets; fund coverage or no. of companies identified or found to be in violation of human or labour rights standards (ILO standards, UNGP, UNGC, OECD guidelines for multinational enterprises); number of work-related accidents; ; board diversity; biodiversity footprint/loss ; metrics related to water use/water risk; third-party ESG ratings of investee companies; aggregate portfolio SDG impact; portfolio impact on individual SDGs.

¹¹ P 10, FSCA, *Sustainable Finance Update Report*, 2025.

¹² A development fund finances economic or social development goals.

Finding 8

Wide variation in quality of engagement policies

In South Africa, many asset managers argue that they prioritise engagement and stewardship over imposing restrictions or exclusions on investments. Although all surveyed asset managers publish a stewardship or engagement policy, the quality and comprehensiveness of these policies vary considerably.

The policies primarily cover listed equity, which is to be expected given the rights that are accorded to shareholders compared to investors in other asset classes. However, best practice recommends that engagement or stewardship policies cover the full range of asset classes that an asset manager is invested in. This includes fixed income, where asset managers do have levers to influence ESG performance, even though these are more limited than for listed equity.¹³

Only five (25%) of the 20 surveyed asset managers set detailed expectations for companies on sustainability topics for engagement purposes. Without detailed expectations, it is difficult to build effective engagement strategies and establish clear engagement objectives.

Four of the five managers that set detailed expectations did so in relation to governance, climate change and biodiversity. The fifth only set detailed expectations for governance.

Finding 9

Engagement policies lack escalation actions

The lack of clear escalation policies at the majority of managers is also concerning. An escalation policy sets out the actions that will be taken when an engagement is failing to achieve the desired outcomes within the required timeframes. The actions could include steps such as voting against shareholder resolutions, tabling or supporting shareholder resolutions, pre-declaring voting intentions or making a public statement.

Only eight (40%) of the 20 asset managers provide an escalation policy with clarity on the steps that will be taken when regular engagement is failing to achieve the desired result. Another two (10%) managers have brief statements relating to escalation actions.

¹³ P 21, ShareAction, [Responsible Investment Standards & Expectations \(RISE\) – Guidance Paper #2](#), 2023.

However, none of the firms assessed sets out the deadlines that trigger actions that must be taken before escalation is initiated. These triggers may be, for example, a three month period of private engagement before moving onto the next step if there is a lack of response, or a two-year deadline before divestment. Two firms outline consequences such as divestment or reduced shareholding that will stem from an unsuccessful engagement, but they do not have timebound triggers for that escalation.

This absence of timebound triggers or defined consequences undermines the potential for engagement resulting in improved ESG performance, and reflects the indulgent approach that many asset managers have towards investee companies.

The survey also found that few asset managers have used the available escalation tactics since 2022. Eight (40%) of the asset managers reported having written a private letter, reflecting the South African preference for “closed-door” engagement, while only five (25%) had issued a public-facing statement and one had asked a question at an AGM (5%).

Six firms report filing or co-filing shareholder resolutions, (Abax, Camissa, Coronation, M&G, OMIG, PSG) but only one of these (Abax) is named on a publicly available shareholder resolution in South Africa, in 2021.

Many of these actions lag international peers. The ShareAction Report found that 40% of asset managers have issued a public-facing statement, 20% have asked questions at AGMs and 30% have filed or co-filed a shareholder resolution. ShareAction has however noted that the number of asset managers using divestment or making public-facing statements has fallen since 2022.¹⁴ Although many asset managers will only divest as a last resort, nine South African firms report that they have either partially or totally divested from equity or corporate debt holdings as part of an escalation strategy. Five asset managers report refusing to purchase new shares, while four report resorting to litigation (no details are provided).

¹⁴ P 34, ShareAction, Point of No Returns, 2025.

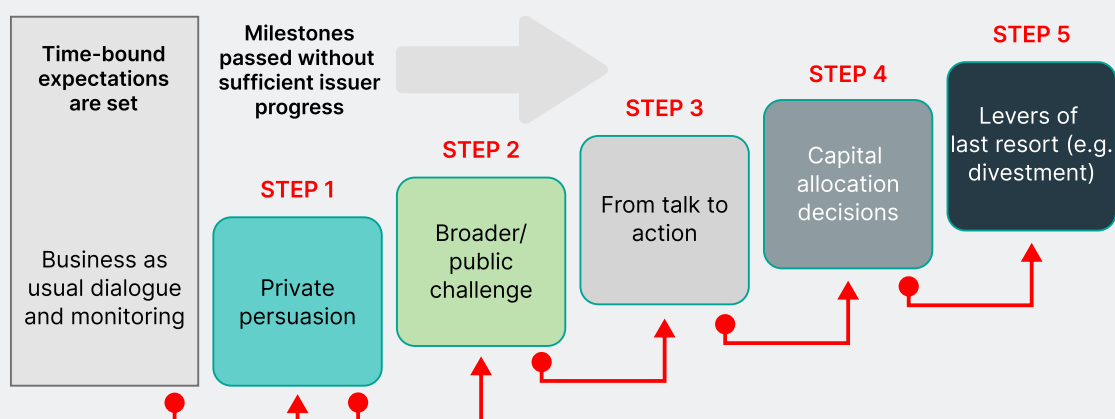


BOX 2 Escalating engagement

Escalating engagement means using additional, more forceful actions if there is an insufficient response to concerns raised by investors during engagement with investee companies. Actions can include: public statements; voting against management; filing shareholder proposals; reducing holdings; and, ultimately, full divestment.

Capital allocation cannot be used as a lever for assets that are managed passively as easily as for active funds (except when creating new funds or changing a fund's mandate); this makes other stewardship actions even more critical. Setting timebound expectations for progress helps ensure that the process doesn't stall, so that the engaged company can expect consequences if it fails to make progress.

Figure 4: Engagement should escalate if insufficient progress is seen



For further information about the importance of escalation frameworks and how they can be robustly implemented, see ShareAction's December 2023 RISE report, *Introducing a Standardised Framework for Escalating Engagement with Companies*.¹⁵

*Reproduced from ShareAction, Point of No Returns 2025*¹⁶

¹⁵ ShareAction, *Introducing a Standardised Framework for Escalating Engagement with Companies*, 2023.

¹⁶ P 31, ShareAction, *Point of No Returns*, 2025.

Finding 10

Reporting on engagement is poor

70% of the assessed asset managers publish a stewardship report describing their engagement activities, but the quality of disclosure is largely poor. Many firms report selectively, with some engagement activities only reported in their PRI Transparency Reports and not in their stewardship reports.

Overall, the level of detail provided is insufficient to enable a meaningful evaluation of engagement efforts. Eight of the 20 firms provide a quantitative assessment of engagement outcomes, and just three present a full list of the companies with which they have engaged. While 12 firms provide case studies of successful engagements, only two of the 12 also provide case studies of unsuccessful engagements, which are equally important to understanding engagement efforts.

No asset managers disclose metrics such as the number of times escalation tools were used or the number of companies at different steps in an escalation timeline. Given that many of the asset managers promote their use of engagement, rather than divestment or screening, in their responsible investment approaches, better disclosure is necessary to enable stakeholders to evaluate the impact of engagement.

Globally, ShareAction finds that the quality of disclosure was better in markets such as the EU and UK, and suggests that this is due to the positive impact of stronger legislation and codes such as the Shareholder Rights Directive in the EU and the UK Stewardship code.¹⁷

Finding 11

Unclear use of third party firms

An emerging trend in South Africa is the use of third-party firms to lead engagement or stewardship activities on behalf of a local asset manager, especially in international markets.

Sanlam Investment Management established a partnership with Robeco in 2020 that appears to cover offshore stewardship activities.

Similarly, Russell Investments is OMIG's stewardship partner for its offshore listed equity portfolios.¹⁸ OMIG states that it assesses Russell Investments' stewardship approach to ensure alignment with OMIG's Listed Equity Stewardship Guidelines.

However, there is a general lack of transparency over how these partnerships work, how objectives are set, and who has oversight of activities and outcomes. This makes it difficult to fully assess the extent to which asset managers are fulfilling their stewardship duties.

¹⁷ P 32, ShareAction, *Point of No Returns*, 2025.

¹⁸ P 68, OMIG, *Responsible Investment Report*, 2024.

Finding 12

Voting policies are focused on governance

Publicly available voting policies are among the basic elements of responsible investment and are recommended in frameworks such as the Code for Responsible Investing in South Africa (CRISA) and the PRI. Only three of 20 asset managers (15%) do not disclose a formal voting policy. However, the majority of voting policies only focus on governance issues, such as those related to director appointments and remuneration.

Of the 17 managers that do disclose a formal voting policy, only six address voting on issues relating to climate change and three address human rights. No asset managers address biodiversity in their voting policies.

Given that there have been very few ESG-related resolutions proposed in South Africa, mainly due to listed companies' unwarranted refusal to table resolutions filed by shareholders, this absence of policy positions on "E" and "S" issues is relatively unsurprising. However, the fact that "say on climate" votes tabled by companies themselves are increasingly common, and given that many managers are also involved in offshore markets where such shareholder resolutions are more common, voting policies should be updated to deal with these.



Climate Change

Southern Africa is widely recognised as a climate hotspot. Climate modeling and studies on extreme weather impacts indicate that South Africa faces an imminent increase in heatwaves, droughts, and heavy rainfall. These will create cascading systemic effects that will undermine efforts to address poverty, unemployment, and food insecurity, making these challenges increasingly intractable.¹⁹ Given this heightened exposure to both physical and transition risks, it is reasonable to expect asset managers operating in the region to demonstrate strong ambition and proactive measures in addressing climate-related risks.

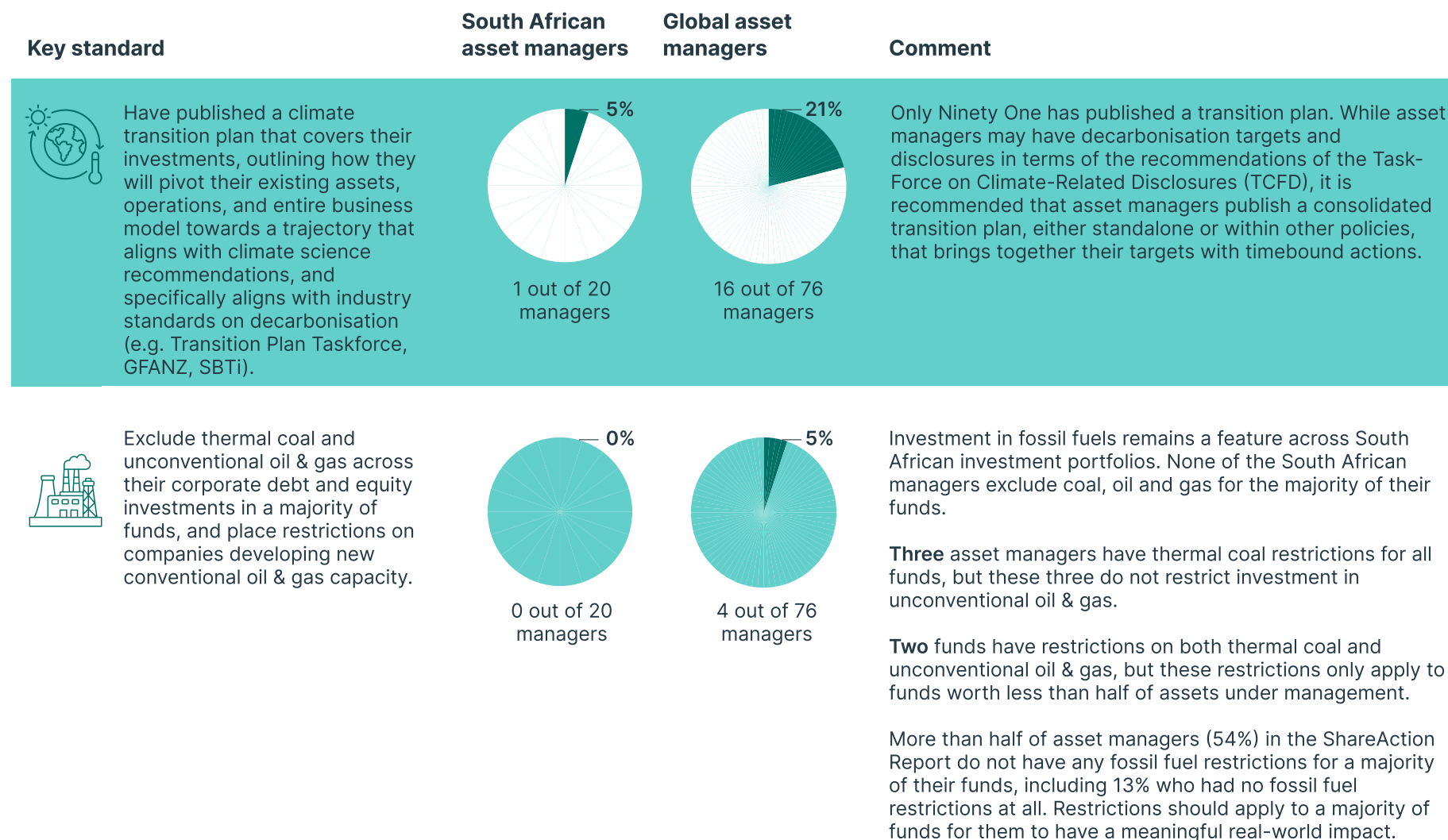
This section considers the extent to which the 20 surveyed South African asset managers have set long-term commitments to reduce greenhouse gas (GHG) emissions, used climate scenarios to inform their investment approach, published climate transition plans, and developed policies that address climate change.

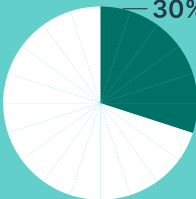
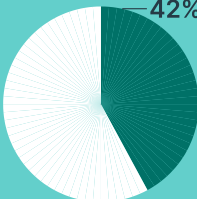
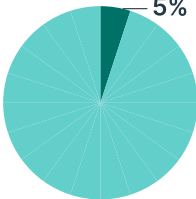
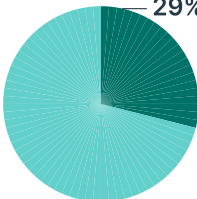
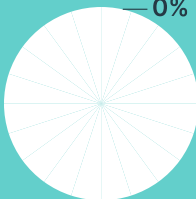
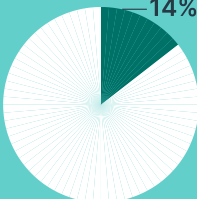
¹⁹ Johnston, P. et al. *Climate Change Impacts in South Africa: What Climate Change Means for a Country and its People*, 2024.

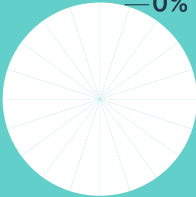
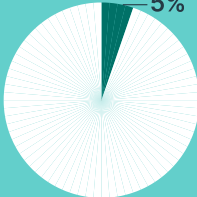


Key Standards

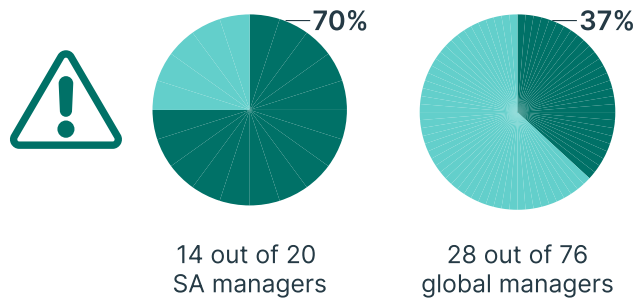
Figure 5: Most asset managers fail to set long-term net-zero targets for investments, undertake scenario analysis or publish a transition plan



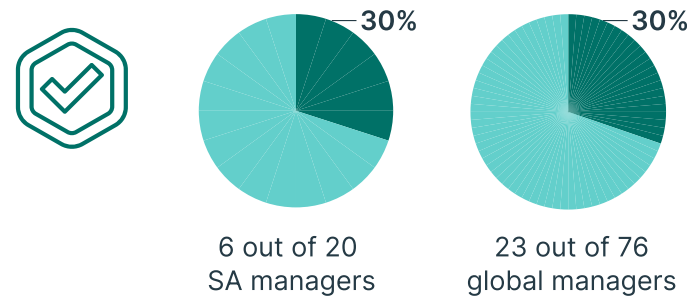
Key standard	South African asset managers	Global asset managers	Comment
 Have demonstrated escalated engagement with investee companies on at least one climate issue since 1 January 2022.	 30% 6 out of 20 managers	 42% 32 out of 76 managers	30% of assessed South African asset managers demonstrated engagement across various climate change issues, including disclosure, transition planning and climate opportunities. Only one asset manager did not provide any examples of engagement on climate. While the other managers publicly disclose evidence of corporate engagement on climate, they do not provide evidence of escalation actions such as divestment; litigation; filing a shareholder resolution; or asking a question at a company AGM.
 Have conducted scenario analysis and demonstrated how this has been used to inform their investment approach, covering transition and physical risks and using at least three varied scenarios, for a substantial proportion of their investment portfolios.	 5% 1 out of 20 managers	 29% 22 out of 76 managers	25% have conducted scenario analysis including both physical and transition risks. Of these: • Two (10%) do not provide evidence of using a wide range of scenarios or the proportion of assets covered by the scenarios. • One (5%) has not used the scenarios to inform its investment approach. • Two (10%) do not show that scenarios cover a substantial proportion of their investment portfolios.
 Have set a specific, measurable, and timebound target for the proportion of their investments to be invested in the climate transition, using a clear classification system.	 0% 0 out of 20 managers	 14% 11 out of 76 managers	No asset managers have publicly set any such target, and none reported private targets.

Key standard	South African asset managers	Global asset managers	Comment
 Have set an interim target to reduce carbon dioxide equivalent (CO₂e) emissions that meets all the following: 1. reduction by at least 50% by 2030; 2. covering at least 50% of AUM; 3. covering all listed equity and corporate bonds; and 4. using either absolute emissions or inflation-adjusted intensity-based metrics.	0%  0 out of 20 managers	5%  4 out of 76 managers	90% of assessed asset managers have not set any public interim emissions reduction target. The two (10%) asset managers that have set an interim target do not meet the standard as their targets are based on portfolio coverage, rather than absolute or intensity-based metrics. One firm's targets also only cover listed equity.

Do NONE of these



Do more than one of these



Finding 13

Net zero targets lacking

Only three (15%) of the 20 assessed South African asset managers have set a net zero target. These are Ninety One and OMIG, which are both members of the Net Zero Asset Managers Initiative (NZAM), as well as the PIC, which, according to its climate change position statement “envisages achieving net-zero by 2050”. The NZAM was launched in 2020 with the aim to support the asset management industry to commit to a goal of net zero emissions by 2050 or sooner. Five (25%) others are in the process of developing climate strategies or are considering introducing a net zero target.

This is compared to the 80% of global asset managers assessed in the ShareAction Report that, as of December 2024, were either committed to achieving net zero by 2050 or sooner, or had set some other form of commitment. Almost all of the global asset managers have also set an interim target, which is commonly related to partial emission reduction by 2030.²⁰

One of the challenges with the South African asset managers that do set a net zero target is the lack of clarity over what the targets actually represent in terms of alignment to specific pathways. Best practice is for targets to be aligned to a specific 1.5°C target by 2050 with low or no overshoot, and with a 2030 interim emission target that demands an absolute reduction in emission levels.

Of those South African asset managers that have set a net zero target, none met the key standard. This requires that the interim target must aim to reduce CO₂ emissions by at least 50% by 2030, cover at least 50% of AUM and all listed equity and corporate bonds, and use either absolute or inflation-adjusted intensity-based metrics. Just four of the 76 asset managers in the ShareAction Report met this standard.

The PIC provides minimal additional information other than its public commitment in its climate change position statement, which “envisages achieving net zero by 2050”. It talks about aligning with South Africa’s Nationally Determined Contribution (NDC) in terms of the Paris Agreement. No interim targets are disclosed.

OMIG and Ninety One have set targets for 2030, but they rely on portfolio coverage rather than an absolute or intensity target. As highlighted in [Box 3](#), portfolio coverage targets have a number of pitfalls as the link to emissions is indirect. OMIG’s target also does not meet the standard as it only covers listed equity.

²⁰ P 39, ShareAction, [Point of No Returns](#), 2025.



BOX 3

NZAM and the role of voluntary coalitions

Launched in 2020, the Net Zero Asset Managers initiative sought to harness the collective power of the asset management industry in committing to net-zero emissions by 2050 or sooner.²¹ Voluntary coalitions like NZAM represent a mechanism for mobilising capital allocators at scale and translating climate commitments into tangible investment decisions that can accelerate the transition to a low-carbon economy.

However, amid intensifying anti-ESG sentiment, the coalition has faced significant strain. Following the departure of major global asset managers including BlackRock, NZAM suspended activities and removed its public commitments, entering a review period to “ensure NZAM remains fit for purpose in the new global context.”²²

This disruption underscores a pivotal challenge for voluntary climate alliances. To fulfill the potential of driving decarbonisation, NZAM must maintain credible, substantive commitments even amid political headwinds. Without steadfast adherence to climate goals, voluntary initiatives risk becoming symbolic gestures rather than effective vehicles for systemic change. NZAM announced in September 2025, that an updated commitment statement will be released before year-end, giving signatories the option to endorse or withdraw from the revised framework.²³ The substance of this new commitment – and the response from asset managers – will serve as a litmus test for the sector’s genuine commitment to addressing climate risk.



BOX 4

Net zero targets fall into three main categories

Asset managers’ net zero targets usually follow one of three methods:

1. **Absolute targets**, which aim to reduce the overall emissions of a portfolio.
2. **Intensity-based targets**, where emissions are reduced relative to value (in terms of company revenue or the security held). For example, targeting a 50% reduction in CO₂e per dollar of revenue by 2030, relative to 2019.

Possible pitfalls of intensity-based targets

- These targets may incentivise the acquisition of more green investments to bring down average intensity, without necessarily guaranteeing existing assets become any less emissions intensive.
- Changes in revenues or share price can distort the progress made, as emissions intensity will not necessarily track absolute emissions.
- Over time, values are likely to trend upwards, so intensity targets could be met with smaller real emissions reductions than would be needed for absolute targets. Targets which **adjust for inflation** can correct for this.

... continued

21 <https://www.netzeroassetmanagers.org/>

22 <https://www.netzeroassetmanagers.org/update-from-the-net-zero-asset-managers-initiative/>

23 <https://www.responsible-investor.com/nzam-to-share-updated-commitment-statement-with-signatories/>



BOX 4

Net zero targets fall into three main categories

3. **Portfolio coverage targets**, where instead of focusing on overall portfolio emissions, asset managers assess whether individual companies within the portfolio are aligned to a credible pathway towards net-zero.²⁴

Possible pitfalls of portfolio coverage targets

- The link to emissions is indirect, and it can lead to a disproportionate focus on engagement (which may not be carried out) relative to capital allocation.
- Some targets only identify companies that already plan to be aligned, rather than actively seeking to encourage change.
- Some targets conflate companies that are aligned to a net-zero pathway (or have already achieved net-zero) with those that are in the process of aligning, or even weaker, those which have committed to align.

Regardless of methodology, asset managers must rigorously evaluate high-emitting companies when determining portfolio composition. Clear engagement expectations and escalation protocols are essential for holding investee companies accountable and achieving meaningful progress toward net-zero targets. Without such mechanisms, net-zero commitments risk becoming accounting exercises rather than catalysts for real-world emissions reductions.

Reproduced from ShareAction, Point of No Returns 2025²⁵

Finding 14

Minimal restrictions on fossil fuel investments

Seven (35%) of the 20 assessed asset managers have introduced some form of restriction on investments in fossil fuels, but the majority of these restrictions only relate to thermal coal – either in terms of mining or power generation – and are not applied to other fossil fuels. Futuregrowth excludes greenfield and brownfield upstream oil, gas and coal activities. Ninety One has restrictions on unconventional oil and gas for certain funds; Coronation has restrictions on oil sand exploration for certain funds, and Allan Gray does not invest in greenfields coal or oil.

Furthermore, the majority of the restrictions are limited to the **expansion** of thermal coal activities. None of the South African funds have introduced absolute restrictions for thermal coal, or restrictions based on a production threshold or a commitment to end financing to the sector by a set date. Only one asset manager, Coronation, has a restriction based on a revenue threshold, i.e., the restriction is imposed where the share of revenue exceeds a certain percentage or an absolute amount.

²⁴ CFD, *Measuring Portfolio Alignment: Technical Considerations*, 2021.

²⁵ P 42, ShareAction, *Point of No Returns*, 2025.

Of the 20 surveyed asset managers, 13 (65%) do not have any restrictions on fossil fuel investments. Some asset managers explain their lack of investment restrictions as being due to the structure of the South African investment landscape with its relatively small number of investable stocks. Others argue that divestment or calling on companies to sell certain fossil fuel assets may actually make the situation worse if the assets are sold to an irresponsible owner.

Another argument put forward is that restrictions on a company based on environmental impacts might ignore the even greater social impacts that make the company a net positive ESG contributor.

However, a number of firms now offer global funds and yet have still not developed an approach towards investment restrictions for fossil fuels (or other ESG factors) that addresses these issues in other jurisdictions which do not suffer from the claimed South African constraints.

Globally, restrictions on fossil fuels are far more prevalent, but, as ShareAction argues, these are still insufficient to incentivise the energy transition, manage risks and align portfolios with policy changes.²⁶ Just nine of the 76 (12%) globally surveyed asset managers reported no public fossil fuel restrictions, while 46% restricted at least one type of fossil fuel for the majority of their funds and another 24% had at least one restriction on fossil fuel investments that applied to most funds.

Finding 15

Asset managers fail to demonstrate adequate analysis of the risks and opportunities relating to climate change

Scenario analysis is a valuable tool to assess potential impacts from climate-related risks and opportunities. These risks include the physical risks that arise from changes in the global climate, and transition risks that result from the shift towards a low carbon economy. However, asset manager responses suggest a lack of ambition and urgency towards assessing climate risks. While challenges relating to data consistency and technical capabilities of experts were highlighted, climate scenario analysis remains a valuable tool for assessing the risk exposure of investments.

Only five (25%) of the 20 asset managers report using scenario analysis that considers both transition and physical risks. Another manager indicates that it uses scenarios in some form, but it is unclear whether they cover both transition and physical risks. This is compared to the 84% of global asset managers in the ShareAction Report that have used some form of scenario analysis²⁷ and 76% that cover both physical and transition risks.²⁸

26 P 43, ShareAction, [Point of No Returns](#), 2025.

27 P 48, ShareAction, [Point of No Returns](#), 2025.

28 P 38, ShareAction, [Point of No Returns](#), 2025.

Only three (4%) asset managers in the ShareAction Report did not provide evidence of using a wide range of scenarios.²⁹ By comparison, disclosure on the use of climate scenarios in South Africa is relatively poor. Two firms indicate their use of scenarios only in their PRI Transparency Reports, but do not disclose this elsewhere. Given the importance of scenarios and their implications for investment planning they should feature in mainstream reports, such as the stewardship report or annual report.

While six South African asset managers report using a 1.5°C scenario such as the International Energy Agency (IEA) Net Zero or Network for Greening the Financial System (NGFS) Net Zero 2025 scenarios, only four of these disclose other scenarios, such as a 2°C to 3°C scenario or over 3°C scenario, that they use in their assessments. Only one firm discloses the proportion of the assets included in its scenario analysis in its annual reports.

Four of the six asset managers have used climate scenario analysis to inform their investment approach in a number of ways. These include applying transition and physical risks to portfolio assessments, using probability weighted evaluations and reducing exposure to climate exposed companies. However, no systematic approach appears to have been applied.

None of the asset managers have considered biodiversity-related risks in their climate scenario analysis. Given that climate risks are interconnected with other systemic challenges such as biodiversity loss, this is a major shortcoming. Only three asset managers in the ShareAction Report included biodiversity in their climate scenario analysis.

Finding 16

Asset managers are not adopting transition plans

Of the 20 surveyed asset managers, only Ninety One has a transition plan, which is a time-bound action plan that clearly outlines how an organisation will pivot its existing assets, operations, and business model to a trajectory that aligns with climate science recommendations. Ninety One provides clear indications of board-level responsibility and oversight for the implementation of the plan, and uses the Science Based Targets initiative (SBTi) framework, which supports emission reduction targets that are aligned with the Paris Agreement goals. However, it fails to incorporate any biodiversity plans or actions to mitigate potential negative impacts on workers or affected communities.

Five other asset managers indicate that work on transition plans is under way. Futuregrowth is currently working on its climate strategy, but it is unclear whether this will include a transition plan in addition to climate-related targets. Momentum Metropolitan has also indicated that it is developing a transition plan, but has not indicated how this will affect its subsidiary Momentum Investments, which is the entity assessed in this report.

29 P 38, ShareAction, [Point of No Returns](#), 2025.

OMIG has indicated that its climate scenarios will be used to identify risks and opportunities that will be integrated into transition planning.³⁰ Stanlib and Truffle have also indicated that transition plans may be in development.

The ShareAction Report found that 21% of surveyed asset managers published a transition plan in some form, but that the quality varied significantly, with few going beyond merely setting targets.

Finding 17

Escalation steps insufficient to support engagement efforts

The majority of assessed asset managers have engaged with investee companies on climate change, with only two (10%) not providing examples of climate change engagement. These engagements have concentrated on emission reduction targets (65%), disclosure (50%) and transition plan credibility (45%), with some focusing on investment in climate opportunities (30%) and climate adaptation and resilience (20%).

However, only six asset managers (30%) demonstrate successful engagements and only one reports escalation steps that have been taken where an engagement has not been successful. This may be a matter of reporting, with most South African managers only presenting basic details of engagement rather than setting out the objectives of an engagement, whether the objectives were reached, and the steps taken if and when the engagement failed.

By comparison, 83% of asset managers in the ShareAction Report could demonstrate at least one example of successful engagement on climate, and 42% showed escalation actions.

30 P 30, OMIG, Responsible Investment Report, 2024.



Biodiversity

The World Economic Forum's 2020 report *Nature Risk Rising* estimated that more than 50% of the world's GDP is either moderately or highly dependent on nature and the services, such as pollination and water purification, that ecosystems provide.³¹ The degradation of ecosystems poses a risk to numerous supply chains, water resources, and important raw materials, with certain sectors, including agriculture, pharmaceuticals and fashion, heavily reliant on well-functioning ecosystems. Biodiversity loss is also interconnected with climate change, as nature-based solutions are critical to climate change adaptation plans.

The systemic risks from biodiversity loss are increasingly recognised, and biodiversity has risen up the responsible investment agenda in recent years through initiatives such as the Taskforce on Nature Related Financial Disclosures (TNFD), which supports increased disclosure of nature-related risks and dependencies.³² However, while certain South African asset managers have reported interest and raised concerns regarding biodiversity loss, there is little sign of action from a capital allocation and portfolio structuring perspective.

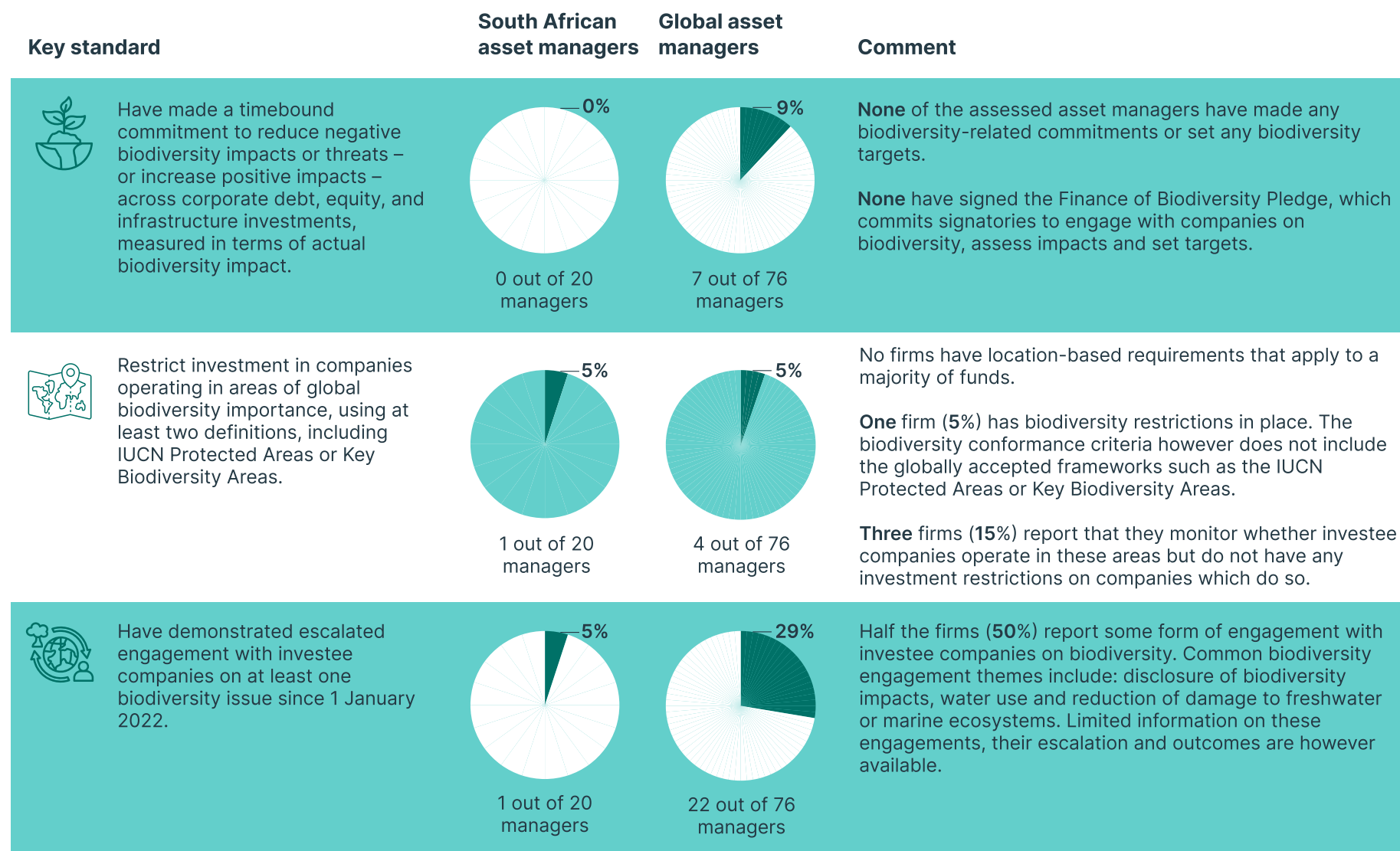
31 https://es.weforum.org/publications/nature-risk-rising-why-the-crisis-engulfing-nature-matters-for-business-and-the-economy/?utm_source=chatgpt.com

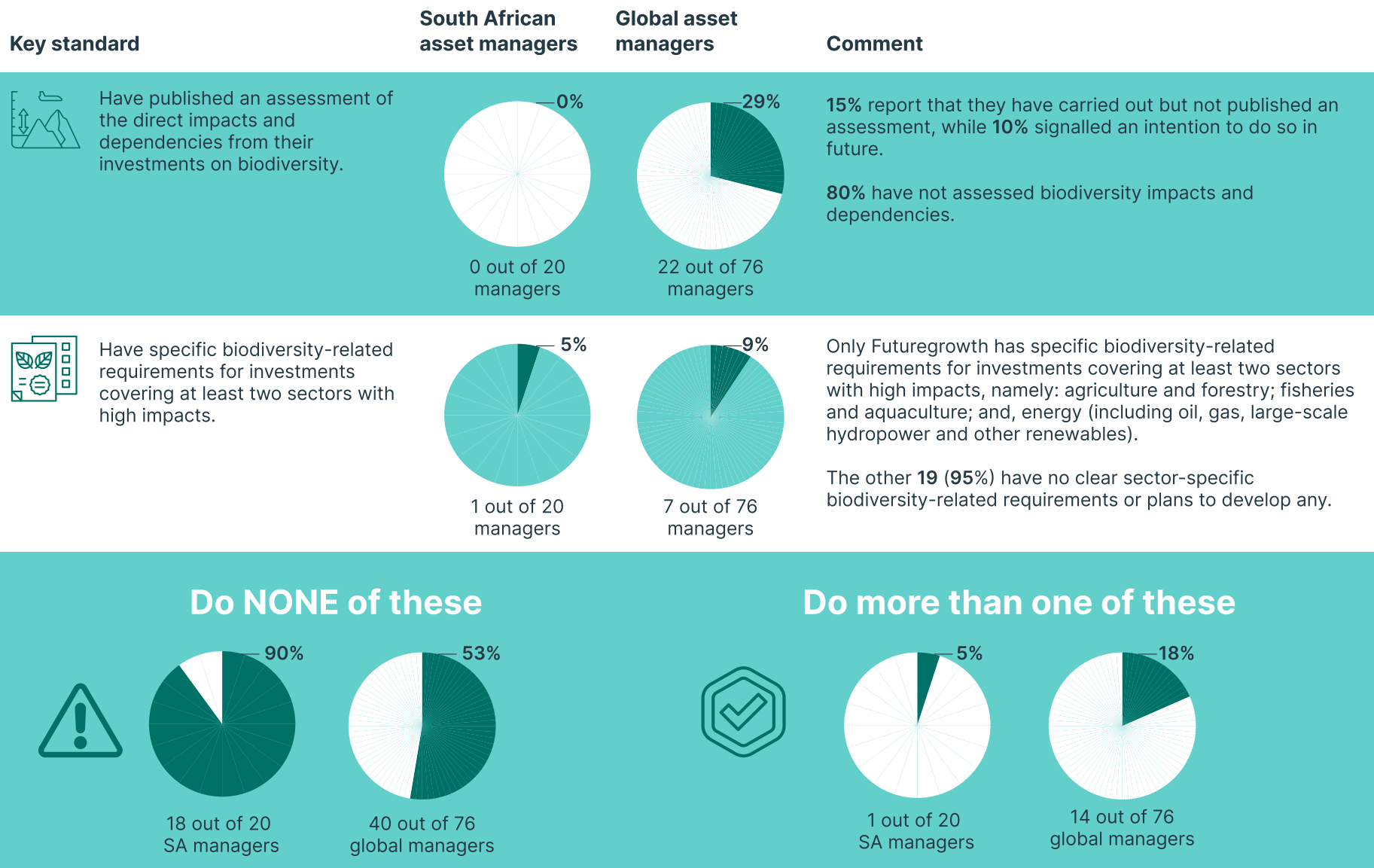
32 Biodiversity-related impacts and dependencies are defined as the ways in which businesses affect (both positively and negatively) and also rely on natural ecosystems. Impacts and dependencies can arise directly from business operations or indirectly from the use of products and services (either upstream or downstream).



Key Standards

Figure 6: The biodiversity-related key standards showed particularly poor attainment levels





Finding 18

Negligible analysis of biodiversity-related impacts and dependencies

While a number of the assessed South African asset managers list biodiversity as one of the ESG issues that they consider in their investment decisions, there is little evidence that firms are using any systematic approach in assessing biodiversity impacts and dependencies. As ShareAction notes in its report:

“Investee companies can have significant impacts on nature (negative and/or positive) and also depend on nature in many ways (for example for water or raw materials). These impacts and dependencies occur both directly and indirectly through the value chain. Both impacts and dependencies on nature vary between sectors and can be financially material, particularly as a result of reputational, legal and physical risk, as well as through the emergence of new business opportunities.”³³

None of the 20 assessed South African asset managers have published an assessment of biodiversity-related impacts and dependencies of their investments. Just three firms (15%) have indicated that they have conducted an assessment but have not published the results, while another does so on a case-by-case basis. Two more have signalled their intention to carry out an assessment.

The three asset managers that have conducted assessments have done them at a high level. As a result, they do not cover the full range of risks to a portfolio across different asset classes. They also do not provide a detailed assessment of the biodiversity-related risks and opportunities across different sectors.

Only one firm disclosed which data tools it has used to identify and assess biodiversity-related impacts and dependencies in its investments, such as Exploring Natural Capital Opportunities, Risks and Exposure (ENCORE) and the World Benchmarking Alliance benchmarks (see [Box 4: Tools for assessing biodiversity impacts and dependencies](#)).

Globally, ShareAction found that 34% of surveyed asset managers had undertaken and disclosed some results of a biodiversity impact and dependencies assessment, while a further 24% had carried out an assessment but not published the results.

³³ P 52, ShareAction, [Point of No Returns](#), 2025.



BOX 5

Tools for assessing biodiversity impacts and dependencies

A number of tools exist which asset managers can use to assess biodiversity impacts and dependencies. The TNFD tool catalogue³⁴ provides a hub for access to data on nature. The Finance for Biodiversity Foundation's guide details the specific features of a range of biodiversity data tools and is updated annually.³⁵

The ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure) tool was most frequently used by asset managers in the ShareAction Report (31 of 76).³⁶ ENCORE offers a materiality rating for the biodiversity impacts and dependencies associated with business activities. The tool was updated in 2024, and now includes value chain links and uses the International Standard Industrial Classification for all Economic Activities (ISIC) to align with more widely used classifications.³⁷

The other tools most commonly reported in the ShareAction Report include Forest 500,³⁸ the Collier FAIRR Protein Producer Index,³⁹ the SPOTT tool,⁴⁰ the World Benchmarking Alliance datasets⁴¹ and the self-reported CDP data, particularly on forests.

It is anticipated that better location data will increasingly become available through disclosures following the TNFD recommendations. The Integrated Biodiversity Assessment tool (IBAT)⁴² and "biodiversity data systems" that use location data should then be used more widely by financial institutions to increase the spatial precision of company-level assessments. Importantly, IBAT offers the facility to enter locations and check against maps of threatened species, protected areas, and other key spatial data layers.

Asset managers should increase their internal capacity to process biodiversity data, and engage with investee companies to disclose location data or site specific assessments, in preparation for increasingly standardised reporting on biodiversity impacts and dependencies. The Nature Positive Initiative has recently released the first draft State of Nature Metrics for piloting, including measures of ecosystem extent, ecosystem condition and species extinction risk.⁴³ Familiarity with tools that provide insights is therefore likely to be highly beneficial in future.

Reproduced from ShareAction, Point of No Returns 2025⁴⁴

34 Taskforce on Nature-related Financial Disclosures, Tools Catalogue.

35 Finance for Biodiversity Foundation, Biodiversity Measurement Approaches Guide (4th edition), 2024."

36 ENCORE, Exploring Natural Capital Opportunities, Risks and Exposure.

37 UNEP-WCMC, Explanatory note on the updated ENCORE knowledge base outlining business dependencies and impacts on nature, 2024.

38 Global Canopy, Companies – Forest 500.

39 FAIRR, Collier FAIRR Protein Producer Index.

40 SPOTT.

41 World Benchmarking Alliance, Nature Benchmark, 2024.

42 IBAT, Integrated Biodiversity Assessment Tool.

43 Nature Positive Initiative, State of Nature Metrics.

44 P 54, ShareAction, Point of No Returns, 2025.

Finding 19

Weak biodiversity-related requirements or restrictions

There are numerous ways to identify areas of global biodiversity importance that can form the basis of potential restrictions. (see [Box 6: Important locations for biodiversity](#)).

These include:

- Key Biodiversity Areas (KBAs), which are scientifically identified as the most important places in the world for biodiversity;
- World Heritage Sites; and
- Ramsar sites.



BOX 6

Important locations for biodiversity

Key Biodiversity Areas (KBAs) are areas identified scientifically as the most important places in the world for biodiversity. KBAs include both areas where biodiversity is under threat, and areas with special ecological value, for example because of their ecological integrity, geographical isolation, or uniqueness. They are designated based on criteria that consider populations of species as well as their habitats or ecosystems.⁴⁵

Protected areas are designated or recognised – normally by legislation – and managed for conservation, but may allow variable amounts of human activity. They include areas such as nature reserves, national parks, wilderness areas, community conserved areas, and protected land and seascapes.

There is some overlap between KBAs and protected areas, as the criteria for establishing a KBA are similar to the reasons why an area would be designated as protected. However, on average, 43% of the area of each KBA is covered by protected and conserved areas,⁴⁶ and analysis from 2017 found that just 20% of KBAs were completely covered by protected areas, 45% were partially covered, and 35% weren't covered at all.⁴⁷

The definition of Critical Habitats using IFC performance standard 6⁴⁸ is similar to that for KBAs, but is not commonly used by asset managers. Spatial data for Critical Habitats are now available via the UN Environment Programme World Conservation Monitoring Centre (UNEP-WCMC).⁴⁹

... continued

45 International Union for the Conservation of Nature (IUCN), A Global Standard for the Identification of Key Biodiversity Areas, 2016.

46 International Union for the Conservation of Nature (IUCN), Key Biodiversity Areas, 2025.

47 Key Biodiversity Areas Partnership, The Relationship between Key Biodiversity Areas (KBAs) and Protected Areas, 2017.

48 International Finance Corporation, Performance Standard 6, 2012.

49 UNEP-WCMC, Global Critical Habitat Screening Layer – Basic, 2024.



BOX 6

Important locations for biodiversity

Other common location-based restrictions apply to much more specific types of area:

- World Heritage Sites are the most common type of area considered (24% of asset managers in the Share Action Report have some policy on World Heritage Sites for at least some of their funds) and are particularly significant protected areas. However, the 266 natural World Heritage Sites cover only about 8% of the total area covered by the almost 300,000 protected areas.⁵⁰
- Ramsar sites are wetlands of international importance that are designated under the Ramsar Convention on Wetlands.⁵¹ They are a subset of protected areas.
- Indigenous and community conserved areas (ICCAs) are territories and areas managed by Indigenous People or local communities in a way that positively contributes to the conservation of nature. There is some overlap with protected areas but not all ICCAs meet that definition, and many are not recognised by governments. UNEP-WCMC maintains a database but information is provided voluntarily, so these data are not definitive.⁵²

Reproduced from ShareAction, Point of No Returns 2025⁵³

None of the assessed South African asset managers restrict investment according to location-based requirements. Concerningly, 16 (80%) of the 20 asset managers do not report or demonstrate that they monitor whether investee companies operate in any areas of global biodiversity importance or have plans to develop this.

This weak performance is compared with 42% of global asset managers in the ShareAction Report that had location-based requirements that either applied to a majority of funds (29%) or some funds (13%).⁵⁴ Out of the 29% with location-based requirements for a majority of funds, only six asset managers restrict investment in companies operating in the most sensitive locations for biodiversity, using at least two definitions, including IUCN protected areas or Key Biodiversity Areas.

In addition to falling short in terms of location-based restrictions, 19 (95%) of the 20 assessed South African asset managers do not have specific biodiversity-related requirements for investments in sectors with high impacts. Sectors with high biodiversity impacts include agriculture and forestry, fisheries and aquaculture, mining and energy, including oil and gas.

Futuregrowth, which has developed sector-specific biodiversity-related requirements for several sectors across different asset classes, is the only South African asset manager that met this standard. Other firms pointed to their engagements with investee companies on biodiversity-related topics, but this does not amount to a requirement or restriction.

⁵⁰ International Union for the Conservation of Nature (IUCN), [Discover Natural World Heritage Sites](#).

⁵¹ Ramsar, [The Convention on Wetlands](#).

⁵² UNEP-WCMC, [ICCA Registry](#).

⁵³ P 58, ShareAction, [Point of No Returns](#), 2025.

⁵⁴ P 50, ShareAction, [Point of No Returns](#), 2025.

Only one South African asset manager, also Futuregrowth, provided an example of a region, project or company it has refused to invest in, or divested from, because of its pressures on ecosystems and biodiversity (e.g. land, freshwater or marine use change, deforestation, pollution, natural resource use or invasive species).

Globally, 47% of asset managers in the ShareAction Report had no clear sector-specific biodiversity-related requirements.⁵⁵ Only 9% of the asset managers had specific biodiversity-related requirements for investments covering at least two sectors with high impacts. The majority of the rest either had policies for certain funds or for single commodities, rather than whole sectors.

Finding 20

Lack of structured approach to biodiversity engagement

Half of the assessed South African asset managers report some form of engagement with investee companies on biodiversity, but there was only one reported instance of a successful engagement and no escalated engagements.

While four asset managers reported engaging on biodiversity disclosures, reduction of damage to freshwater or marine ecosystems and water use, only a single firm engaged on biodiversity targets and commitments. Three firms reported engagements on the assessment of biodiversity impacts and or/dependencies. Two of the asset managers reported engaging on reduction of deforestation and two on reduction of damage through habitat conversion. Only Sanlam Investment Management reports any effort to systematically engage with investee companies in material sectors to disclose location-level data on biodiversity.

No assessed South African asset managers have developed a structured approach to engaging with investee companies on biodiversity issues. Many of the reported engagements are post-fact engagements to reduce harm from pollution, rather than forward-looking efforts to address the systemic crisis facing nature.

By comparison, 61% of global asset managers in the ShareAction Report could demonstrate at least one example of successful engagement on biodiversity, and only seven companies (9%) gave no examples of engagement on biodiversity.⁵⁶

⁵⁵ P 51, ShareAction, [Point of No Returns](#), 2025

⁵⁶ P 51, ShareAction, [Point of No Returns](#), 2025



BOX 7

Leading practice: company specific location data

Several asset managers show clear leadership, demonstrating that action can be taken on this issue.

Aviva Investors' Nature Engagement Programme focuses on biodiversity loss linked to deforestation and ecosystem conversion and includes sector-specific asks to the mining, oil & gas, consumer staples, and banking sectors. As part of the programme, Aviva Investors requests that some companies disclose location-level data as part of their biodiversity impact and ecosystem dependency assessment.⁵⁷ Additionally, Aviva Investors (on behalf of Aviva Plc) is part of the Finance Sector Deforestation Action (FSDA) investor group and has publicly shared its expectations that companies commit to and disclose the traceability of forest-risk commodities to all tiers of suppliers, to a point which is sufficient to know and control deforestation. The FSDA's newly developed investor expectations for commercial and investment banks reiterate the expectation that banks' clients establish full traceability and compliance systems that monitor and control deforestation across value chains.⁵⁸

Legal & General Investment Management (LGIM) sets clear expectations of companies, through engagement, to develop how they understand and address their nature-related impacts, dependencies, risks and opportunities. In line with the TNFD's LEAP (Locate, Evaluate, Assess and Prepare) due diligence process, LGIM expects companies to evaluate location-specific interfaces with nature and priority impacts, dependencies, risks and opportunities across direct operations and value chains; and promotes the reporting of the TNFD's core global indicators that are relevant to a company's business model, sector(s), biome(s) and priority locations, as well as their adoption of the LEAP assessment processes.⁵⁹

Robeco encourages companies to disclose location-level data when they operate or source in high-risk areas and incorporates this information in its proprietary biodiversity assessment of companies. Robeco's 2023 Stewardship Report states: "This process will include looking for sector-specific biodiversity data and information specific to particular biological communities (such as forests and oceans), where there are big knowledge gaps. We will continue our research combining the location of company assets and biodiversity data and intend to explore conducting scenario analysis."⁶⁰ In a separate white paper, Robeco highlights that by focusing "on a limited number of sectors, where biodiversity data coverage is generally better, investors can address a large part of their biodiversity footprint, and also leverage their existing work in the same sectors around climate change [...] This includes, for instance, an inquiry into how we might use geospatial data to inform the localised impact of mining companies within our portfolios."⁶¹

Robeco recently conducted a study jointly with Climate Engine which explored the opportunities and challenges of integrating geospatial data and analysis into financial decision-making in order to protect biodiversity.⁶²

Reproduced from ShareAction, Point of No Returns 2025⁶³

⁵⁷ Aviva Investors, *Navigating Nature*, 2024.

⁵⁸ IIGCC, *Finance Sector Deforestation Action (FSDA) Expectations for Commercial and Investment Banks*, 2024.

⁵⁹ Legal & General Investment Management, *LGIM's Natural Capital Management Policy*, 2024.

⁶⁰ Robeco, *Stewardship Report 2023: Accelerating Positive Change in Companies for Economy, Environment and Society*, 2024.

⁶¹ Robeco, *Navigating the Biodiversity Landscape*, 2024.

⁶² Climate Engine and Robeco, *Leveraging Geospatial & AI For Biodiversity Finance: A Case Study of Mining*, 2024.

⁶³ P55–56, ShareAction, *Point of No Returns*, 2025.



Social Impacts

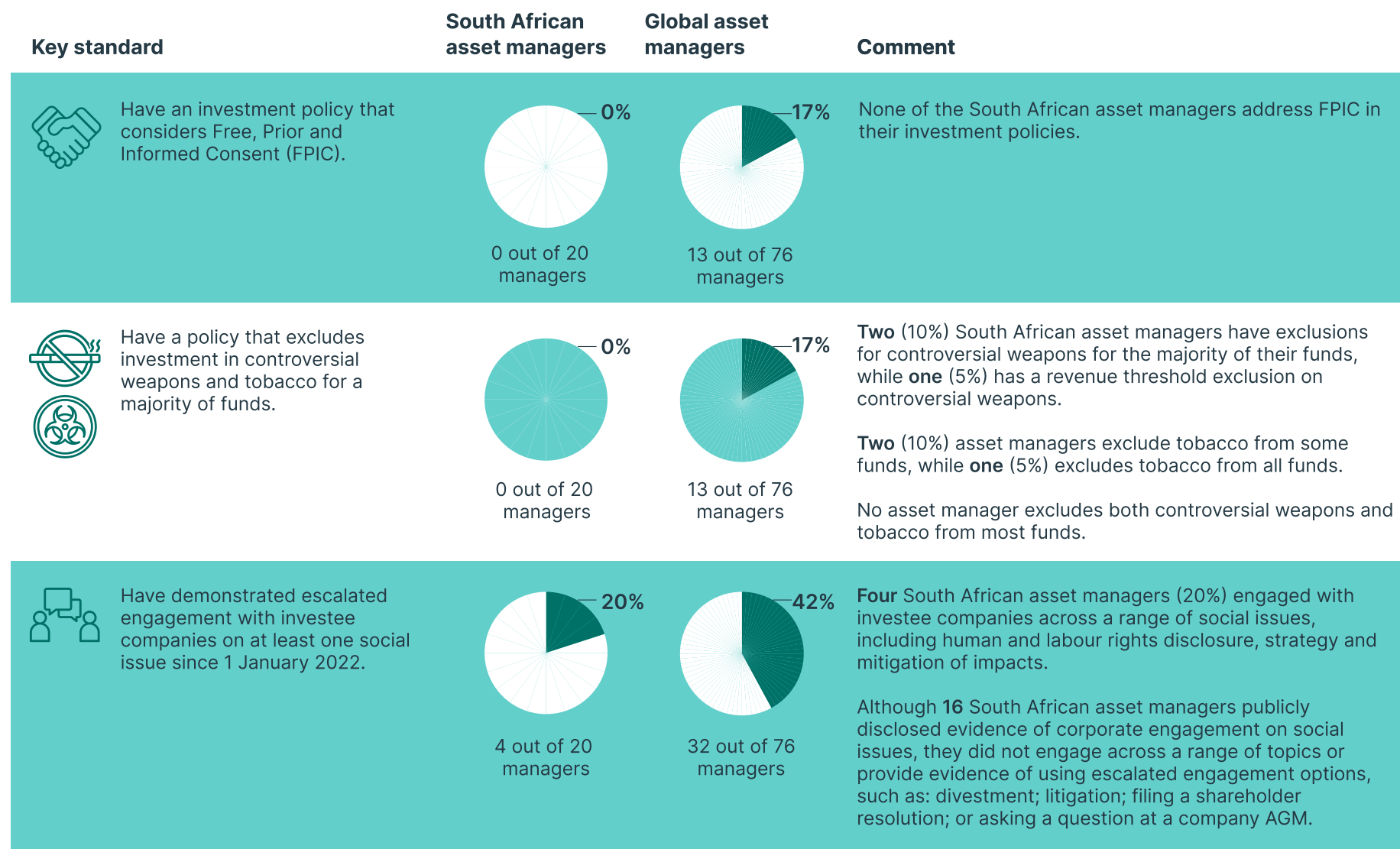
Social impacts span both human and labour rights, and wider issues such as pay gaps and tax behaviour. Despite the considerable social impacts facing investors in South Africa, asset managers surveyed do not demonstrate sufficient actions to address the risks to investee companies and society in general through their investment processes and stewardship activities.

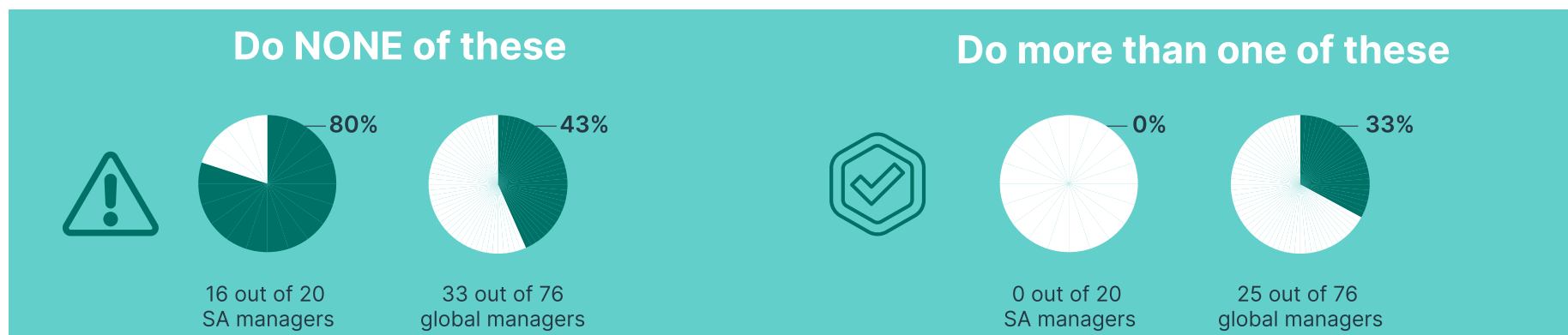
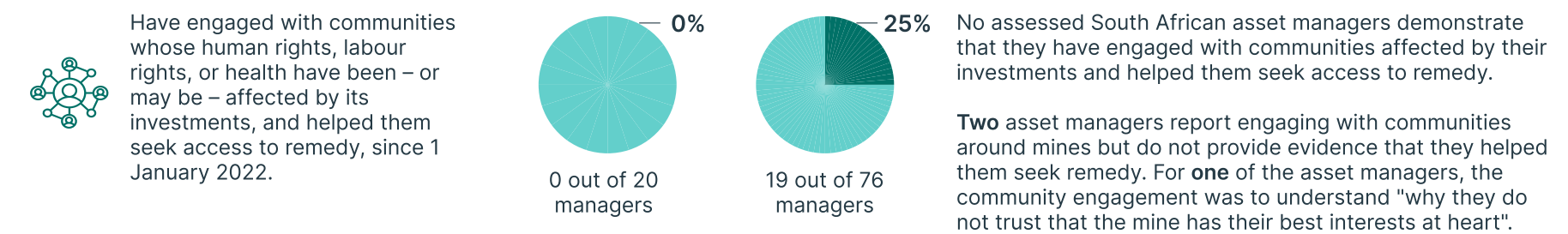
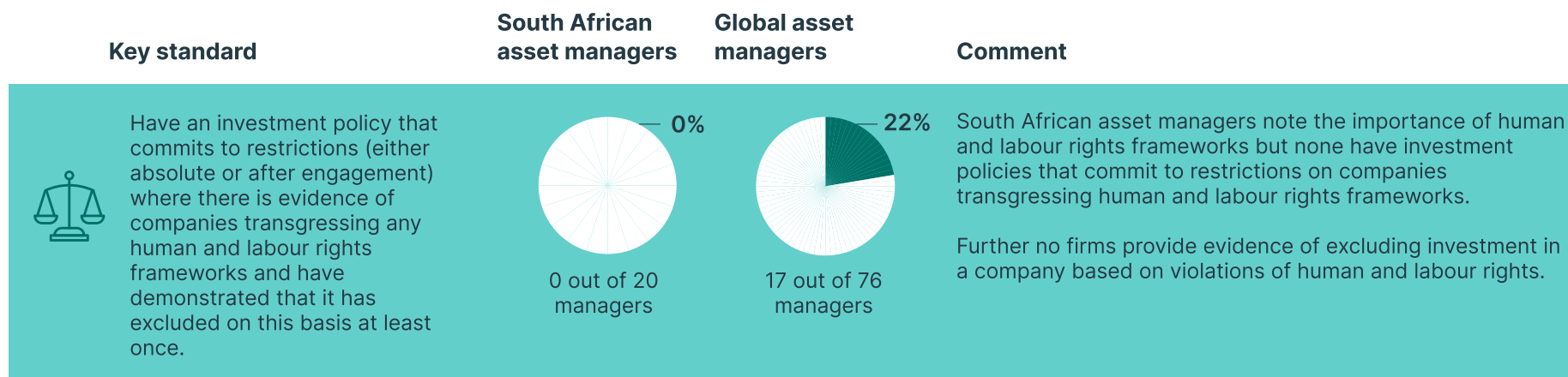




Key Standards

Figure 7: The social key standards also showed poor attainment levels





Finding 21

Assessment of human rights undeveloped

Asset managers can take various steps to address risks related to human rights. These include due diligence to identify actual and potential negative impacts on workers and communities arising from the operations of investee companies, providing access to a complaints procedure or remedy for those affected by human rights violations, and actions to prevent or mitigate negative human rights impacts.

Of the 20 asset managers assessed, eight (40%) report undertaking human rights due diligence, of which one also takes action to prevent or mitigate human rights impacts. None of the asset managers report providing access to a complaints procedure or remedy for those affected by human rights violations while only Coronation, Foord and M&G indicate that they evaluate the effectiveness of actions taken. In general, responses suggest that South African asset managers are not implementing a systematic approach towards human rights.

The quality of reporting is highly variable. The majority of firms do not provide any disclosures based on metrics such as workforce diversity, pay gaps, workplace injuries or reports of possible human rights violations across their portfolios.

Finding 22

Investment policies fail to sufficiently address human rights

None of the managers evaluated met the key standard for adopting investment policies that commit to restrictions for companies transgressing human and labour rights frameworks. While many social impacts are complex and do not necessarily fall into simple exclusions, human rights are universal and entrenched in international law. By avoiding any formal commitment to restrict investments in companies that violate human rights, asset managers are failing to set clear expectations for investee companies.

Coronation's Stewardship and Sustainability Policy includes "conduct-based exclusions" of companies that "engage in practices that cause or could result in material harm to the environment and/or have a negative social impact". It is guided by the UN Global Compact in making these exclusions. Futuregrowth's policy restricts investments on the basis of modern slavery in line with the UN Guiding Principles on Business and Human Rights. However, neither Coronation nor Futuregrowth provides any evidence of having implemented any such exclusions and therefore do not meet the key standard.

Other asset managers such as M&G, which says in its Responsible Investment Policy that it is guided by the Universal Declaration of Human Rights and the International Labour Organisation's core labour standards, and OMIG, which emphasises the role and importance of human rights, do not go as far as committing to restrict investments based on human rights issues.

Compared to other regions, restrictions related to common social factors – such as tobacco and controversial weapons (which include chemical weapons, biological weapons, landmines and cluster munitions) – remain limited.

There has been an emerging debate, particularly in Europe, over the ESG credentials of the defence sector.⁶⁴ Those in support argue that the defence sector is critical to national and global security, while arguments against include the ethics of weapon use. However, there is widespread agreement against weapons that cause indiscriminate or long-lasting harm. Three (15%) South African asset managers have exclusions for controversial weapons in their responsible investment policies, but only two of these impose these restrictions across the majority of their funds. Two of the three also exclude nuclear weapons.

In terms of other restrictions on factors such as pollution, technology, tax behaviour, tobacco and food speculation,⁶⁵ only three asset managers (15%) have set out exclusions. Three of the four are focussed on tobacco but the restrictions also include conduct-based exclusions based on the UN Global Compact and conventional weapons.

The ShareAction Report shows that, while socially-related investment restrictions among global asset managers are also relatively uncommon,⁶⁶ they are far more prevalent than in South Africa. A majority of the asset managers in the ShareAction Report have some form of restriction on controversial weapons across most or all their funds, while 25% exclude tobacco production from most of their funds.

No assessed South African firms have investment policies that include Free, Prior and Informed Consent, which is a right that is recognised in the UN Declaration on the Rights of Indigenous Peoples, and which allows indigenous groups to give or withhold consent to a project that may affect them or their territories (see [Box 8: Free, Prior and Informed Consent and Indigenous Rights](#)). This is compared to 17% of asset managers in the ShareAction Report.

The importance of a commitment on FPIC is best reflected by one asset manager (Camissa) that reports engaging with communities around a mine to understand “why they do not trust that the mine has their best interests at heart”. This reflects a lack of understanding of the nature of the impacts of mining on affected communities.

⁶⁴ See, for example, *Why Europe must not allow defence investments to be labelled sustainable*, Reuters, 27 August 2025; and *Defending defence is the hot new strategy in ESG investing*, Financial Times, 26 September 2025.

⁶⁵ Food speculation refers to the practice of trading commodity derivatives (such as futures and options) linked to agricultural products and food commodities, with the primary intent of profiting from price fluctuations. Speculation by financial investors can amplify price volatility, potentially contributing to food price spikes that disproportionately harm vulnerable populations who spend a large portion of their income on food. Responsible investors should ensure financial participation in food commodity markets does not conflict with fiduciary duties to consider broader societal impacts, particularly regarding food security and access to affordable nutrition.

⁶⁶ P 67, ShareAction, *Point of No Returns*, 2025.



BOX 8

Free, prior and informed consent and indigenous rights

The principle of Free, Prior, and Informed Consent (FPIC) is recognised in the UN Declaration on the Rights of Indigenous Peoples. Indigenous Peoples have the right to give or withhold consent to a project that may affect them or their territories. This right extends to the conditions under which the project will be designed, implemented, monitored and evaluated. If FPIC is not respected, and explicit consent not given, then a project cannot go ahead without violating the Indigenous Peoples' rights. Simply consulting with potentially affected Indigenous Peoples, or complying with local laws, are not sufficient to justify a project.

While FPIC originally was applied only to Indigenous Peoples, in the last decade, development experts have recognised that it is also good practice to undertake with other local communities, to protect "everyone's right to self-determination".⁶⁷

For FPIC to be more than a tickbox exercise, asset managers must clearly define how they expect investee companies to ensure all three elements (free, prior, and informed) are met, with clear reference to international agreements (such as the UN Declaration on the Rights of Indigenous Peoples) and Indigenous Peoples' own laws, protocols, and processes.^{68,69}

Consent itself must be explicit, take a form that reflects the laws and practices of the potentially affected Indigenous Peoples, and detail both the process underlying the agreement and commitments the parties will uphold. FPIC is iterative, meaning consent must be reaffirmed throughout the development of the project as circumstances change and new information becomes available.

Full respect for FPIC should be complemented by fair and accessible grievance mechanisms, robust due diligence frameworks, and disclosures on both ongoing FPIC processes and the implementation of agreements with Indigenous Peoples. The asset manager should seek expert third-party verification of investee companies' respect for FPIC, and identify conditions under which it will seek direct engagement with potentially affected Indigenous Peoples. Where investee companies fall short of FPIC standards, asset managers should follow an engagement and escalation process (see [Finding 9](#)), culminating in divestment if concrete progress is not made.⁷⁰

Respecting FPIC and the rights of Indigenous Peoples is not only a moral imperative, but also a strategic necessity for asset managers that want to mitigate risk. Ignoring or neglecting these rights may lead to conflicts and resistance from local communities – causing disrupted operations, delayed projects, financial losses, legal challenges, and reputational damage.

Reproduced from ShareAction, Point of No Returns 2025⁷¹

67 [FAO, Free Prior and Informed Consent: An Indigenous Peoples' Right and a Good Practice for Local Communities: Manual for Project Practitioners, 2016.](#)

68 [Ibid.](#)

69 [Amazon Watch, Respecting Indigenous Rights: An Actionable Due Diligence Toolkit for Institutional Investors, 2023.](#)

70 [Friends of the Earth, Forests and Human Rights: Principles for Asset Managers, 2020.](#)

71 [P 73, ShareAction, Point of No Returns, 2025.](#)

Finding 23

Inadequate action on social impacts including the “just transition”

A fairly common refrain from South African asset managers is that social impacts are overlooked in favour of environmental issues, or that social impacts need to be “balanced” against environmental factors. This argument is often made to justify pushback against ambitious climate action. This approach fails to recognise that climate change is as much a social issue as an environmental issue, but even so, the assessed managers display little evidence of engaging holistically with social impacts.

Just four (20%) of the surveyed asset managers demonstrate a successful engagement on social impacts in their reports. None of the assessed asset managers provides evidence of excluding investment in a company or a project based on social issues.

Half (50%) of the 20 assessed asset managers noted that they embed “just transition” considerations into their investment approach. A just transition is one that ensures that the shift to a sustainable economy distributes benefits equally and does not come at the expense of certain groups or communities. Six of these asset managers demonstrate this by engaging with investee companies on the just transition, while five reported changes in capital allocation. Three asset managers have advocated for investee companies to adopt policies on the just transition.

As noted above, the apparent lack of action may be due to poor disclosure. However, given that South African asset managers largely rely on engagement, as opposed to exclusionary policies, one could expect greater evidence of successful engagements and, in light of the ongoing social challenges, more transparency in terms of engagement objectives, timelines and escalation steps.



BOX 9

Leading practice: Escalating on human and labour rights

Amazon Web Services provides services to government customers with a history of human rights abuses, and Amazon’s collection of user data is associated with a risk of mass surveillance. However, the company’s disclosures are unclear on how the company aims to prevent customer misuse.

After engaging with Amazon on human rights topics for several years, **Robeco** co-filed a shareholder proposal in 2023. This requested the board of directors to commission an independent third-party report assessing Amazon’s customer due diligence process. This is necessary to determine whether customers’ use of its products and services that have surveillance, computer vision or cloud storage capabilities contributes to human rights violations. This shareholder resolution received 34% support.⁷²

Reproduced from ShareAction, Point of No Returns 2025⁷³

⁷² Robeco, *RobecoSAM Global SDG Engagement Equities Fund Report Q2 2023*, 2023.

⁷³ P 77, ShareAction, *Point of No Returns*, 2025.



Recommendations

The following recommendations are reproduced from the ShareAction *Point of No Returns* 2025 report.⁷⁴ While South Africa has its own regulatory environment, the ShareAction recommendations for global stakeholders are based on principles that can equally be applied in South Africa.

Recommendations for asset managers

Asset managers should use the [full list of key standards](#) as a focused but not exhaustive set of recommendations to improve their responsible investment approach.

Recommendations for asset owners

Asset owners and their beneficiaries have the most to lose from inaction on the themes covered by this report. The wide-reaching and systemic nature of the associated risks mean that it is not possible to avoid them simply through diversification or divestment. Asset owners should use their influence to hold asset managers to account on these risks. We recommend that asset owners:

1. Use this research to inform selection, monitoring and review of asset managers.
2. Firmly embed clear and specific expectations on the integration and reporting of climate, biodiversity and social impacts into investment mandates.
3. Require asset managers to regularly report on how responsible investment issues are being managed at all stages of the investment process, and include case studies.
4. Engage asset managers where the above expectations are not met.
5. Consider engaging collaboratively with other asset owners who share their asset manager. When multiple clients engage an asset manager on a specific topic, it can enhance their effectiveness by demonstrating the strength of feeling among their clients.
6. End relationships with asset managers who do not live up to set expectations on managing responsible investment issues.

Recommendations for policy makers

Regulation is a powerful way to raise minimum standards across an industry. The development of sustainable finance legislation across Europe has correlated with higher ratings attained by European asset managers in the ShareAction Report. Just Share recommends that policymakers:

1. Ensure that regulation requires asset managers to be transparent in reporting on how their investments impact climate, biodiversity, public health and human and labour rights.
2. Ensure that regulation requires transparency on engagement and escalation policies and activities.
3. Provide clarity that market abuse rules and anti-trust rules will not apply to institutional investors when they conduct collaborative engagement activities relating to sustainability issues like climate change.

⁷⁴ ShareAction, *Point of No Returns*, 2025., p42–44

Full list of Key Standards

Theme	Standard
Governance & Stewardship	Discloses impact metrics to clients across all portfolios.
	Has an engagement policy with a defined escalation process, setting out timebound escalation triggers and consequences of unsuccessful engagement.
	Provides detailed disclosure of engagements (full list of companies/quantitative outcomes/frequency of escalation/exclusion list).
	Has demonstrated engagement on either equity, corporate or sovereign debt since 1st January 2022 regarding responsible investment issues using at least one of the following tactics: made a public-facing statement; imposed responsible investment-related conditions on new share or bond issue purchases; refused to purchase new share or bond issues; divested equities or bonds.
Climate Change	Has published a climate transition plan that covers its investments, outlining how it will pivot its existing assets, operations, and entire business model towards a trajectory that aligns with climate science recommendations, and specifically aligns with industry standards on decarbonisation (e.g. Transition Plan Taskforce, GFANZ, SBTi). ⁷⁵
	Excludes thermal coal and unconventional oil & gas across its corporate debt and equity investments in a majority of funds, and places restrictions on companies developing new conventional oil & gas capacity. ⁷⁶
	Has demonstrated escalated engagement with investee companies on at least one climate issue since 1 January 2022.
	Has conducted scenario analysis and demonstrated how this has been used to inform its investment approach, covering transition and physical risks and using at least three varied scenarios, for a substantial proportion of its investment portfolios.
	Has set a specific, measurable and timebound public target for the proportion of its investments to be invested in the climate transition, using a clear classification system. ⁷⁷
	Has set an interim target to reduce CO ₂ e emissions that meets ALL of the following: 1. by at least 50% by 2030; 2. covering at least 50% of AUM; 3. covering all listed equity and corporate bonds; and 4. using either absolute or inflation-adjusted intensity-based metrics.

⁷⁵ Targets alone should not be considered a plan.

⁷⁶ We include in this definition oil sands, Arctic oil & gas, ultra-deepwater oil & gas, and fracked oil & gas.

⁷⁷ For example, low-carbon and climate-resilient technologies, assets, or projects.

Theme	Standard
Biodiversity	Has made a timebound commitment to reduce negative biodiversity impacts or threats – or increase positive impacts – across corporate debt, equity, and infrastructure investments, measured in terms of actual biodiversity impact.
	Restricts investment in companies operating in the most sensitive locations for biodiversity, using at least two definitions, including IUCN protected areas or Key Biodiversity Areas.
	Has demonstrated escalated engagement with investee companies on at least one biodiversity issue since 1 January 2022.
	Assesses direct impacts and dependencies from its investments on biodiversity. ⁷⁸
	Has specific biodiversity-related requirements for investments covering at least two critical sectors, covering at least equities and fixed interest.
Social Impacts	Has an investment policy that considers Free, Prior and Informed Consent (FPIC). ⁷⁹
	Has a policy that excludes investment in controversial weapons and tobacco.
	Has demonstrated escalated engagement with investee companies on at least one social issue since 1 January 2022.
	Has an investment policy that commits to restrictions (either absolute or after engagement) where there is evidence of companies transgressing any human and labour rights frameworks and has demonstrated that it has excluded on this basis at least once.
	Has engaged with communities whose human rights, labour rights, or health have been – or may be – affected by its investments, and helped them seek access to remedy, since 1 January 2022.

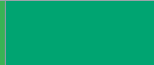
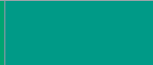
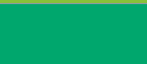
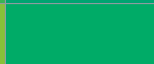
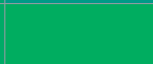
⁷⁸ We define biodiversity-related impacts and dependencies as the ways in which businesses affect (both positively and negatively) and also rely on natural ecosystems. Impacts and dependencies can arise directly from business operations or indirectly from the use of products and services (either upstream or downstream).

⁷⁹ FPIC is a right that is recognised in the UN Declaration on the Rights of Indigenous Peoples. It allows Indigenous People to give or withhold consent to a project that may affect them or their territories. It also enables them to negotiate the conditions under which the project will be designed, implemented, monitored and evaluated.

Appendix 1

ShareAction ranking of global asset managers

Heatmap key
0%  100%

Rank	Asset manager	Region	Country	Grade	Overall score	Climate Change	Biodiversity	Social	Governance & Stewardship
1	Robeco	Europe	Netherlands	A	76%				
2	APG Asset Management	Europe	Netherlands	A	75%				
3	AXA Investment Managers	Europe	France	B	73%				
4	BNP Paribas Asset Management	Europe	France	B	69%				
5	Aviva Investors	Europe	United Kingdom	B	64%				
6	Nordea Asset Management	Europe	Finland	B	64%				
7	Allianz Global Investors	Europe	Germany	B	61%				
8	SEB Investment Management	Europe	Sweden	B	60%				
9	Achmea Investment Management	Europe	Netherlands	B	55%				
10	Legal & General Investment Management	Europe	United Kingdom	C	57%				
11	Schroders Investment Management Limited	Europe	United Kingdom	C	52%				

Rank	Asset manager	Region	Country	Grade	Overall score	Climate Change	Biodiversity	Social	Governance & Stewardship
12	Amundi Asset Management	Europe	France	C	50%				
13	Eurizon Capital	Europe	Italy	C	47%				
14	PGGM	Europe	Netherlands	C	46%				
15	Nomura Asset Management	Asia	Japan	C	45%				
16	Ofi Invest Asset Management	Europe	France	C	42%				
17	M&G Investment Management	Europe	United Kingdom	C	42%				
18	DWS Group	Europe	Germany	C	40%				
19	Union Investment	Europe	Germany	D	36%				
20	UBS Asset Management	Europe	Switzerland	D	36%				
21	Generali Asset Management	Europe	Italy	D	33%				
22	MEAG	Europe	Germany	D	31%				
23	T. Rowe Price Associates	North America	United States	D	31%				
24	HSBC Asset Management	Europe	United Kingdom	D	30%				
25	Fidelity International	Europe	United Kingdom	D	29%				
26	Aegon Asset Management	Europe	Netherlands	D	29%				
27	Royal London Asset Management (RLAM)	Europe	United Kingdom	D	29%				

Rank	Asset manager	Region	Country	Grade	Overall score	Climate Change	Biodiversity	Social	Governance & Stewardship
28	Nuveen	North America	United States	D	29%				
29	aberddeen	Europe	United Kingdom	D	28%				
30	Pictet Asset Management	Europe	Switzerland	D	28%				
31	Columbia Threadneedle Investments	North America	United States	D	27%				
32	Ostrum Asset Management	Europe	France	D	26%				
33	Wellington Management International	North America	United States	D	25%				
34	Deka Investment	Europe	Germany	D	25%				
35	Goldman Sachs Asset Management	North America	United States	D	25%				
36	PGIM Fixed Income	North America	United States	D	24%				
37	Manulife investment Management	North America	Canada	D	20%				
38	PIMCO	North America	United States	E	25%				
39	Baillie Gifford & Co	Europe	United Kingdom	E	24%				
40	Vontobel Asset Management	Europe	Switzerland	E	22%				
41	Morgan Stanley Investment Management	North America	United States	E	22%				
42	Eastspring Investments	Asia	Singapore	E	21%				
43	Northern Trust Asset Management	North America	United States	E	20%				

Rank	Asset manager	Region	Country	Grade	Overall score	Climate Change	Biodiversity	Social	Governance & Stewardship
44	J. P. Morgan Asset Management	North America	United States	E	19%				
45	Asset ManagementOne Co., Ltd.	Asia	Japan	E	18%				
46	Santander Asset Management	Europe	Spain	E	18%				
47	Macquarie Asset Management	Asia	Australia	E	17%				
48	MFS Investment Management	North America	United States	E	17%				
49	Nikko Asset Management	Asia	Japan	E	17%				
50	Sumitomo Mitsui Trust Asset Management	Asia	Japan	E	17%				
51	Capital Group	North America	United States	E	16%				
52	Insight Investment	Europe	United Kingdom	E	15%				
53	BlackRock	North America	United States	E	15%				
54	Swisscanto Asset Managment	Europe	Switzerland	E	15%				
55	Swiss Life Asset Managers	Europe	Switzerland	E	14%				
56	RBC Global Asset Management	North America	Canada	E	14%				
57	Janus Henderson Investors UK Ltd.	Europe	United Kingdom	E	14%				
58	AllianceBernstein	North America	United States	E	14%				
59	Ping An Asset Management Co., Ltd.	Asia	China	E	14%				

Rank	Asset manager	Region	Country	Grade	Overall score	Climate Change	Biodiversity	Social	Governance & Stewardship
60	E Fund Management Co., Ltd.	Asia	China	E	13%				
61	State Street Global Advisors	North America	United States	E	13%				
62	Franklin Templeton	North America	United States	E	13%				
63	Anima	Europe	Italy	E	12%				
64	Invesco Ltd.	North America	United States	E	12%				
65	Mitsubishi UFJ Trust and Banking Corporation	Asia	Japan	E	10%				
66	Nissay Asset Management	Asia	Japan	E	8%				
67	Dimensional Fund Advisors	North America	United States	E	8%				
68	Vanguard	North America	United States	E	6%				
69	KBC Asset Management NV	Europe	Belgium	F	7%				
70	Principal Global Investors	North America	United States	F	7%				
71	TD Asset Management	North America	United States	F	5%				
72	MetLife Investment Management	North America	United States	F	5%				
73	Mirae Asset Global Investors	Asia	South Korea	F	5%				
74	Fidelity Investments	North America	United States	F	3%				
75	China Life Asset Management Company Ltd.	Asia	China	F	1%				
76	Samsung Asset Management	Asia	South Korea	F	0%				

Appendix 2

Methodology

Asset manager selection

This report covers 20 of South Africa's largest asset management firms using the Alexforbes 2024 Manager Watch Survey of Retirement Fund Investment Managers.⁸⁰ The Alexforbes survey offered a comprehensive review of the South African asset manager landscape and was used as the primary sampling and firm size source. This report excluded firms that are deemed ineligible because they are:

- Umbrella organisations which don't set policies at group level (in which case we consider their subsidiaries).
- Private equity or alternative asset specialists.
- Other types of firms; e.g. consultants, administrators, brokers, etc.

Survey process

The methodology used in this report is identical to ShareAction's 2025 *Point of No Returns* report. The full survey included 87 questions and can be found [here](#).

For this report, the survey was first completed in full for each asset manager by Just Share's research team, based on publicly available information. Every answer option was populated with supporting text and references to any source documents or web pages.

All asset managers in the scope of the survey were then sent the prefilled survey submission in February 2025 and provided with one month to reply. Asset managers were invited to check the submission and to provide additional publicly available evidence to support their answers. We accepted evidence related to any policies that were due to be made public before the end of June 2025. The asset managers also had the option to provide further clarification privately, should there be additional relevant information not yet released or commercially sensitive. 15 of the 20 (75%) asset managers participated in this review.

The Just Share research team then reviewed all submissions in full. Scoring was based on publicly available information, however our researchers used information supplied privately to inform our commentary in the report and the development of future surveys. For each thematic topic in the survey (governance and stewardship, climate, biodiversity, social impacts), the data review was divided between at least two team members. Any unclear answers or borderline cases were discussed by all researchers focusing on that thematic topic to ensure consistency in scoring across all answers from all asset managers. Any further queries or outliers that arose during the data analysis stage were double-checked against source material where appropriate.

⁸⁰ Alexforbes, [Manager Watch Survey of Retirement Fund Investment Managers](#), published April 2024.

Grades and ranking

Each institution has been assigned a grade as a measure of its performance. This report links these grades to meeting specific 'key standards' rather than overall scores. Asset managers are ranked first by grade and then by overall score within each grade.

Key Standards

The key standards are intended to give a clear and simple overall summary of each asset manager's performance across the themes covered in this report. They focus on specific topics, while the overall score measures supporting details and answers across all questions in the survey.

A total of 20 key standards have been identified across the themes in the survey: six in the climate section; five each in biodiversity and social impacts; and four in governance and stewardship. These are based on indicators which we considered to be the most important and fundamental in each section. Asset managers' collective performance against these standards is summarised at the start of each theme in this report. The [full list of the 20 key standards](#) is set out in the recommendations section.

The key standards are designed to be consistent with best practice but have been set at a level that is achievable and realistic given the current state of the sector: all the 20 standards were achieved by at least one asset manager in the ShareAction Report. To ensure the key standards are judged in as fair a way as possible, the thresholds to achieve the standards have been set in a way that seeks to avoid being overly prescriptive.

To provide the greatest clarity of meaning and simplicity, the standards are assessed and reported on a simple binary yes/no basis. An asset manager that meets a standard may, for example, be doing just enough to do so, or may be exceeding the standard by some distance. Conversely, an asset manager that does not meet a standard may be falling a long way short, or only just missing the threshold. This extra level of detail is captured in the overall score (which is used for the ranking). Examples of asset managers demonstrating leading practice above and beyond the key standards have been highlighted throughout the report.

Assigning grades

Grades have been assigned based on the number of key standards achieved, according to the table below ([Figure 8](#)). For higher grades, we also required key standards to be achieved across each section. Asset managers could essentially 'miss' (at most) one theme and still achieve a B grade, but needed to score in every section to receive an A.

Figure 8: Key standards summary

Grade	Required proportion of standards	Number of standards required	Additional requirements
A	≥ 80%	16	At least one standard in each section
B	≥ 60%	12	–
C	≥ 40%	8	–
D	≥ 20%	4	–
E	At least 1	1	–
F	None	0	–
Total number of standards available		20	–

Scoring

A maximum number of available points was assigned to each question, and each answer option within it. Higher numbers of points were available where the question covered more content or was of greater significance for responsible investment. Some questions were included in the survey to enhance our understanding of the results and/or overall trends in responsible finance and were not scored.

Available points were distributed across the thematic topics according to the weightings below (Figure 9). The distribution of points is in line with the distribution of key standards across the sections:

Figure 9: Overall score weightings by theme

Governance and stewardship	Climate	Biodiversity	Social
20%	30%	25%	25%

The asset manager's overall score is the sum of all the points it scored across all questions for which it was eligible, plus a bonus for each key standard achieved.

Approach for specialist asset managers

All asset managers were asked the same set of questions. However, the survey includes both managers which invest across a broad spectrum of different asset classes, and others who specialise. A small number of questions in the survey were not applicable to all asset managers. For example, some ask about actions that are only relevant to specific asset classes, such as voting in relation to equities, while others relate to policies for passively managed assets. In both cases, the scores for the affected questions were small in the overall context, and the number of managers affected was small. Nevertheless, to ensure fairness, the research team categorised asset managers and reviewed each manager's asset holdings and approach in detail to ensure that affected asset managers were not unfairly penalised.

Fixed interest specialists

Some asset managers prioritise bond investments over equities. We categorised asset managers to ensure that they were equitably treated when scoring certain questions – for example, on the scope of investment restrictions. Asset managers with less than 10% of holdings in listed equity have been categorised as debt specialists. Asset managers with less than 10% of holdings in corporate debt have been categorised as equity specialists.

Similarly, active-only fund managers, with less than 10% of holdings in passive funds, were not penalised in cases where other managers were penalised for not extending investment policies to new passive offerings.



Appendix 3

International human and labour rights frameworks

Asset managers can integrate the following standards, guidelines, and principles into their policies and their due diligence processes, while engaging with companies and clients to ensure they are meeting these expectations and reporting in line with them.

International Labour Organization (ILO) standards

International labour standards are legal instruments that set out basic principles and rights at work. There are 11 fundamental instruments – 10 Conventions (legally binding international treaties that may be ratified by member states) and a Protocol.⁸¹ The initial Conventions covered subjects such as freedom of association and the right to collective bargaining; the elimination of forced labour and child labour; and the elimination of discrimination in respect of employment. The right to a safe and healthy working environment was added to the ILO's framework of rights at work in June 2022.

OECD Guidelines for Multinational Enterprises and Responsible Business Conduct for Institutional Investors

The OECD Guidelines for Multinational Enterprises provide non-binding principles and standards for responsible business conduct for multinational corporations, including investors, which operate in or from countries adhering to the OECD Declaration on International Investment and Multinational Enterprises.⁸²

United Nations Global Compact (UNGC)

The UNGC is a non-binding initiative to get businesses to adopt sustainable and socially responsible policies, based on 10 social and environmental principles (six of which refer specifically to human and labour rights) and to report on their progress on these.⁸³

United Nations Guiding Principles on Business and Human Rights (UNGPs)

The UNGPs are a set of guidelines for states and companies to prevent, address and remedy human rights abuses committed in business operations. They rest on three pillars: the duty of the state to protect human rights; the responsibility of corporations to respect human rights; and access to remedy for victims of business-related abuses.⁸⁴

⁸¹ See: <https://libguides.ilo.org/c.php?g=714313&p=5168767>

⁸² See: OECD, *Guidelines for Multinational Enterprises*, 2011; OECD, *Declaration on International Investment and Multinational Enterprises*, 2011; OECD, *Responsible business conduct for institutional investors: Key considerations for due diligence under the OECD Guidelines for Multinational Enterprises*, 2017.

⁸³ UN Global Compact, *The Ten Principles*, 2023.

⁸⁴ UN, *Guiding Principles on Business and Human Rights*, 2011.

Appendix 4

Controversial and conventional weapons

Controversial weapons include weapons of mass destruction and weapons that cause indiscriminate harm, and are covered by several international agreements:

- The 1968 Treaty on Non-Proliferation of Nuclear Weapons
- The 1972 Biological and 1997 Chemical Weapons Conventions
- The 1997 Ottawa Treaty (covers anti-personnel landmines)
- The 2008 Convention on Cluster Munitions
- The 2014 Arms Trade Treaty
- The 2017 Treaty on the Prohibition of Nuclear Weapons

The UN Charter does not forbid its member states to own and use **conventional weapons** when this is done in conformity with international law. However, the 1981 Convention on Certain Conventional Weapons seeks to ban or restrict the use of specific types of weapons that have indiscriminate effects on civilians or cause unnecessary suffering for combatants: incendiary weapons; weapons that produce non-detectable fragments; mines, booby-traps and other devices; blinding laser weapons; and explosive remnants of war.



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