



July 2020

Responsible Investing

How best to measure asset managers' credentials when it comes to ESG

A transparent approach is required particularly when it comes to measuring ESG AuM, assessing proxy voting track record and understanding ESG datasets

Overview

If one were to name key industry-wide buzzwords in asset management over the past few years, 'ESG' would easily be at or close to the top of the list. In the United States, new money inflows into ESG mutual funds and exchange-traded-funds hit a record high of US\$20 billion last year, almost quadruple the number in 2018¹; in Europe, new inflows of €120 billion into European ESG funds has increased the total assets in European sustainable funds to €688 billion in 2019, 56% higher than that in 2018².

The evidence so far this year has been that this trend has continued with ESG funds and indices outperforming their parent benchmarks and ESG ETF equity flows proving to be considerably more resilient that their non-ESG ETF equity counterparts³.

When it comes to public policy, regulators and supervisors are also playing a more forceful role in pushing the ESG agenda. For example, European Central Bank President Lagarde has emphasised that the ongoing review of the ECB's monetary policy strategy creates an opportunity to reflect on how to address sustainability considerations within the central bank's monetary policy framework⁴.

In addition, the increasing interest among asset owners when it comes to ESG has also been driving investments in this area. In fact as of 2019, 96% of UN PRI signatory asset owners' asset under management (AuM) have been covered with missions, strategies or investment policies in responsible investments⁵.

In what has become a more active regulatory ESG environment, and to cater to the booming demand from asset owners, asset managers have entered a new battlefield, competing on areas from ESG product offering to dedicated green campaigns. In a world where rankings have become one of the most important factors driving decision-making, from choosing a restaurant to applying to university, it is unsurprising to witness how asset managers are now trying to top one another in ESG metrics, such as green AuM, proxy voting and press coverage.

However, league tables in ESG capabilities are not as straightforward as one might imagine. Addressed in a previous DWS white paper *Slaying ESG Dragons*⁶, data inconsistency has long been a difficult problem in this universe. In this paper, we reveal three major data pitfalls to watch for when assessing firms' credentials in respect of ESG KPIs.

We focus on discerning ESG capabilities from a myriad of data metrics at a firm level, rather than at a fund level. According to the Responsible Investment Framework, introduced by the Investment Association UK, firm-level components comprise ESG integration, stewardship and exclusions, usually interconnected and used in combination⁷. Our analysis concentrates on ESG integration and stewardship components, since exclusion involves more subjective, value-based judgements. We hope shedding light on the various approaches deployed will help to deliver more transparency is this muddy space.

FIGURE 1. REPORTED ASSET MANAGERS RANKINGS IN ESG/SRI AUM (€BN) BY TOTAL EXTERNAL CLIENT (YE 2018)

Ranking	Total	Negative Screening/Exclusion	Impact Investing
1	Legal & General Investment Management	Ares Management	Swisscanto Invest by Zürcher Kantonalbank
	993.7	111.9	48.0
2	NN Investment Partners	Merian Global Investors	
2	414.5	103.3	6.5
3	PIMCO	Robeco	Aquila Capital
3	278.7	90.9	4.4
4	Dodge & Cox	Northern Trust Asset Management	Putnam Investments
	249.6	70.2	4.3
5	BNP Paribas Asset Management	Union Investment	Sycomore Asset Management
	222.0	41.4	2.9
6	UBS Asset Management	Kempen Capital Management	Impax Asset Management
•	193.4	34.2	2.9
7	Neuberger Berman	Heitman	Northern Trust Asset Management
	158.3	33.8	2.0
8	State Street Global Advisors	Union Bancaire Privee, UBP SA	Muzinich & Co
	157.0	25.4	1.9
9	Legg Mason	Eurizon Asset Management	SCOR Investment Partners
y	154.2	24.3	1.7
10	Amundi Asset Management	Comgest	Candriam Investors Group
10	150.8	24.2	1.3

Source: IPE (June 2019). IPE ESG/SRI Survey.

Green AuM: ESG integration counted or not?

Let's first consider ESG AuM, which can differ for the same company depending on the agency reporting the statistics. We have chosen IPE's approach to ESG AuM reporting across the market place. Its approach benefits from covering more categories, as well as a wider range of individual asset managers. In its 2019 survey, illustrated in Figure 1, Investment & Pensions Europe (IPE) reported the 2018 total ESG / SRI AuM for more than 150 asset managers globally. It also assigned dedicated AuM rankings according to the different ESG strategies deployed, for example, negative screening, best-in-class, thematic and impact investing8. While the latest data only references 2018 data, as we await an update to their analysis, we believe it provides a good snapshot of the marketplace when it comes to ESG AuM.

Confusingly, what appears to be substantial total ESG/SRI AuM for most managers (second column in Figure 1), is not matched by correspondingly large ESG / SRI AuM assigned to dedicated ESG strategies, represented in columns three and four of Figure 1. The inconsistency is explained by what asset managers are doing behind the scenes when it comes to ESG integration.

ESG integration, as defined by the Principles for Responsible Investment, is the explicit and systematic inclusion of ESG issues in investment analysis and investment decisions9. In ESG integration, ESG quality factors do not overrule financial factors and any financially immaterial ESG factors do not affect investment decisions¹⁰. Compared to the above-mentioned specific ESG strategies, such as negative screening or impact investing, ESG integration only acts as a starting point and can sometimes use techniques that are difficult to verify. This is why at DWS, it is important to have our ESG AuM

put into the scope of the third party assurance by our statutory auditor. At DWS, ESG integration is strictlydefined and underpinned by our ESG Integration Policy across the Active investment platform. This requires that all investment specialists in equity and fixed income include ESG aspects into earnings estimates, valuation models and investment recommendations in a detailed manner.

DWS also only labels strategies as ESG integration when the following criteria are met: first, the strategy is actively managed and second we have coverage of ESG data (the overall SynRatingi) of more than 90% of the portfolio. As of 31 December 2019, €413.6 billion of AuM has been identified in ESG integration for 1,573 actively managed strategies.

As for dedicated ESG strategies, DWS has selected dedicated ESG AuM as one of its Sustainability Key Performance Indicators. This, as well as the other KPIs, will be tracked and monitored quarterly from 2020 onwards. Our objective is to measure and manage progress in a transparent and consistent fashion. With a continuously increasing number of dedicated ESG strategies, DWS reported €69.7 billion of dedicated ESG and sustainable AuM at the end of last year, which includes €16.5 billion of real estate investments in certified green-labelled buildings and €862 million of infrastructure investments in renewable assets. Combining integrated and dedicated ESG strategies translates into ESG AuM equivalent to 68% of total AuM, illustrated in Figure 2.

FIGURE 2. DWS ESG/SRI AUM (AS OF 31 DEC 2019)

	Assets (€bn)	Percentage
ESG Integration Strategies*	451.0	59%
Dedicated ESG Strategies**	69.7	9%
Total ESG AuM	520.7	68%
Total AuM	767.4	100%

^{* €451} billion includes € 27 billion in Direct Real Estate and € 10 billion in Infrastructure, on top of the €413.6 billion in Active & Liquid Real Assets. ** Real estate and infrastructure consist of € 16.5 billion and € 0.86 billion respectively. Source: DWS Investment GmbH (March 2020). DWS Sustainability Report 2019.

Proxy votes against management: it is all about the denominator

Signalling the 'rebellious' gene within an asset manager, proxy votes against management is widely-used as an essential criterion in corporate governance, to quantify the

i SynRating is the overall ESG score given by the proprietary DWS ESG Engine, which is outlined on page 4

level of scrutiny and the will to drive change. However, a deeper examination into various corporate governance reports shows that asset managers have been employing a number of different calculations around this metric. A simplified and hypothetical example for asset manager X is illustrated in Figure 3.

FIGURE 3. ASSET MANAGER X PROXY VOTING METRICS

# of votes against	# of companies voted	# of meetings voted	# of resolutions voted
1,500	1,500	2,000	10,000
Proxy votes against management	100%	75%	15%

Source: DWS Investment GmbH (May 2020) For illustrative purposes only

As shown, this "rebellious" measure can range from 15% to 75%, or even 100%, by applying smaller denominators such as the number of meetings held or companies voted, instead of number of resolution items, provided that there are usually multiple resolutions raised in one shareholders' meeting and one company can have more than one shareholders' meeting per year¹¹. It might seem cynical to regard such calculations as intentionally misleading, nevertheless, it is fair to say such examples perfectly demonstrate how primary school maths can shape reader perception.

In its annual Proxy Voting and Engagement Report, DWS calculates and discloses the more conservative metric proxy votes against management divided by number of resolutions / items voted. For DWS funds in Europe and Japan, 21% were voted with an "Against" / "Withhold" out of all the voted resolutions / items. If another denominator (# of meetings voted) is used, the figure would be 72%, indicating 1,477 meetings out of 2,045 meetings were voted with at least an "Against" / "Withhold" 12.

Figure 4 serves as another example. When evaluating asset managers' support for ESG resolutions, Morningstar has adopted the average number of resolutions voted across the five-year period from 2015 and 2019, as the assessment measure of managers' proxy voting behaviour¹³. We expect this will become an even more important metric particularly for those managers close to the bottom of the Figure 4 league table.

FIGURE 4. THE 10 MOST SUPPORTIVE AND LEAST SUPPORTIVE ASSET MANAGERS FOR ESG-SHAREHOLDER **PROPOSALS (2015 – 2019)**

Fund Group	# of Resolutions Voted	Support (%)		
Top 10 - Most Supportive				
DWS	998	87%		
Allianz Global Investors	794	78%		
Blackstone	360	73%		
TIAA (Nuveen)	977	67%		
AQR	882	67%		
AllianceBernstein	942	65%		
PIMCO	646	65%		
Guggenheim	929	65%		
Wells Fargo	1003	64%		
Mainstay (incl. IndexIQ)	976	63%		
Bottom 10 - Least Supportive				
Federated	970	8%		
Hartford (Wellington)	795	7%		
JP Morgan	1002	6%		
Amundi (Pioneer Funds)	554	6%		
American Funds Capital Group	737	4%		
Vanguard	1033	4%		
BlackRock (Incl. iShares)	1033	3%		
Lord Abbett	706	3%		
Voya	1027	3%		
DFA (Dimensional)	1004	1%		

Source: Morningstar (February 2020)

ESG data sources: scope of inclusion not consistent

Asset managers also boast about the wide ESG dataset and information they consume as testimony to the rigour with which they integrate ESG. This has been used as evidence that an increasing number of asset managers are building up an in-house ESG methodology and scoring system for corporate and sovereign issuers. This is happening at a time when professional ESG data providers are growing in both size and significance highlighted by the

fervent level of merger and acquisition activity in the sector, such as ISS-Oekom14.

We have also seen traditional data providers join this trend either by developing ESG data sets in-house or by acquisitions of other dedicated ESG data providers. S&P Dow Jones Indices acquired over 98% stake in Trucost, a carbon and risk analysis provider, in 2016. More recently, S&P Global acquired SAM (RobecoSAM ESG rating business) from Robeco in January 2020¹⁵. Fitch launched an integrated scoring system, ESG Relevance Scores, to substantiate how ESG factors influence credit rating actions in 2019¹⁶. Morningstar announced it would acquire the remaining approximate 60% of Sustainalytics in April 2020, after owning a close to 40% stake, which it had acquired in 2017¹⁷.

All this M&A activity adds additional difficulty when it comes to disclosing the number of ESG data providers used by asset managers. For example, is it necessary to discern Oekom from ISS? Therefore, when asset managers disclose third-party ESG data providers in their PRI annual Transparency Report or Sustainability Report, the scope is not entirely consistent. Some only identify dedicated external ESG providers, such as Sustainalytics, MSCI or Trucost, while some others include existing financial data sources which provide additional ESG information, such as the three traditional credit agencies and Bloomberg. Thus the number of external ESG data providers presents only a limited level of evidence on the data capabilities one asset manager possesses.

At DWS, our proprietary ESG Engine collects data from five dedicated ESG data vendors, including ISS (Ethix and Oekom), MSCI, Morningstar (including Sustainalytics), S&P TruCost and Arabesque S-Ray, a high-tech ESG data provider, of which DWS bought a minor stake in 2019 to leverage its machine learning capabilities and has recently been integrated onto our platform. The ESG Engine covers 13,000 issuers and helps DWS professionals systematically integrate ESG factors into the investment process. This structured database is embedded within our portfolio management tool and is available for all liquid asset classes18.

Behind quantitative measures: more qualitative aspects need to be considered

In addition to the three quantitative metrics mentioned above, a number of other metrics are also being closely watched by asset owners and investment consultants -

ESG AuM growth, inflows and number of ESG products among others. We believe only by incorporating the qualitative contexts can one really make sensible judgements on asset managers' ESG capabilities.

For instance, due to limited availability of clean data around ESG and historically fluid categorisation, greater AuM growth and inflows can be achieved by ESG fund reclassification¹⁹. Similarly a larger number of ESG-related products does not testify for better approaches, underlying assets nor investment processes. Indeed when it comes to ESG fund classification more levels of scrutiny are required. Thankfully, the EU Action Plan on Sustainable Finance is a good example of increased oversight and regulation in this area.

To push this to the next step, robust ESG approaches, funds, assets and processes should be equipped with good ESG reporting. However, companies are faced with another layer of complexity, given the myriad of different reporting frameworks developed globally, ranging from the PRI, GRI, SASB, CDP to TCFD, all of which are aiming to provide guidance on measuring, assessing and reporting ESG initiatives, risks and opportunities.

In spite of the efforts underway which are trying to address concerns on reporting incoherence, such as the collaborative Better Alignment Project, the existing standards and frameworks are still individually important with distinct aims, fulfilling information needs of various audiences and serving different purposes²⁰. Unsurprisingly this can be another challenging area for both asset managers and asset owners.

Not surprisingly asset managers are increasingly being ranked according to these various metrics to assess their ESG credentials. In a recent Credit Suisse equity research recommendation, DWS is acknowledged by its ESGbranded assets, flows and performance and is CS's top pick along with Amundi²¹. In its 2020 Sustainable Investments awards, Environmental Finance has recently announced DWS winning the award for the Best Sustainability Reporting by an Asset Manager²².

Conclusion

Our aim in this paper is to show some of the metrics and their associated pitfalls in assessing ESG KPIs among asset managers. For example, classifying ESG AuM according to ESG integration rather than sustainable investment objective can inflate ESG AuM significantly. Or when assessing the performance of asset managers by proxy voting, votes against management in percentage

terms can be artificially increased if a smaller denominator, such as number of companies voted, is applied. Lastly, asset managers often reveal the number of ESG data providers as an indication of their ESG commitment. However, this may not lead to more or superior data or even deeper ESG integration.

More rigorous questions therefore need to be asked on specific ESG strategies, on engagement activities with investee companies, and on data coverage and analysis methodologies. And more qualitative factors need to be taken into account when evaluating ESG credentials in a broader context.

Since becoming a newly listed company in 2018, DWS has recently published its second annual Sustainability Report. In this report, we have developed our own set of Sustainability KPIs to track and measure our own progress when it comes to ESG. These include dedicated ESG AuM, proxy voting by number of meetings attended, number of corporate engagements and gender diversity among others23.

We believe with greater transparency and third party auditing we will not only help to stamp out greenwashing, but, improve the trust and integrity of the rapidly growing ESG marketplace. Indeed, faced with inconsistencies in quantifying methodology, scope of disclosure, use of metrics and so on, industry bodies, regulators, asset managers and asset owners need to continue their collaboration in establishing a dependable framework for ESG KPIs. Behind the noisy self-promotion stage, more due diligence, comprehensive disclosure and joint efforts are necessary to make this change happen.

The Authors



Wan Huang **Investment Specialist** wan.huang@dws.com



Michael Lewis Head of ESG Thematic Research michael.lewis@dws.com

References

- ¹ Morningstar (January 2020). Sustainable Fund Flows in 2019 Smash Previous Records
- ² ESG Clarity (February 2020). European ESG funds pulled in record inflows in Q4 according to Morningstar
- ³ DWS Investment GmbH (June 2020). We monitor the performance and fund flows of the Xtrackers Equity ESG UCITS ETFs for the World, USA, Europe, Japan and Emerging Markets universe
- ⁴ European Central Bank (February 2020). Christine Lagarde: Climate change and the financial sector
- ⁵ PRI. Annual Report 2019
- ⁶ DWS Research Institute (February 2018). Slaying ESG Dragons
- ⁷The Investment Association (November 2019). IA Responsible Investment Framework Final Report
- ⁸ Investment & Pensions Europe (June 2020). ESG/SRI 2019
- ⁹ PRI (April 2018). What is ESG integration
- ¹⁰ DWS (March 2020). Sustainability Report 2019
- ¹¹ Volkswagen AG (March 2019). Abridged agenda for the Annual General Meeting on May 14, 2019
- ¹² DWS Corporate Governance Center (May 2020). Proxy Voting and Engagement Report 2019
- ¹³ Morningstar Manager Research (13 February 2020). ESG Proxy Voting Trends: More support for ESG issues, but the largest firms lag
- ¹⁴ Institutional Shareholder Services Inc. (March 2018). Deal Furthers ISS' Responsible Investment Business Expansion
- ¹⁵ S&P Global (March 2020). The Rising Importance of ESG Data
- ¹⁶ Fitch Ratings (January 2020). Fitch Ratings Named Best ESG, Investment Grade, Public Finance and Sovereigns Agency
- ¹⁷ Morningstar (April 2020). Morningstar to Acquire Sustainalytics and Expand Access to ESG Research, Data, and Analytics for Investors Worldwide
- ¹⁸ DWS (March 2020). Sustainability Report 2019
- ¹⁹ Exane BNP Paribas (April 2020). ESG: Savior of Active Management?
- ²⁰ Corporate Reporting Dialogue (September 2019). Driving Alignment in Climate-related Reporting: Year One of the Better Alignment Project
- ²¹ Citywire (May 2020). Credit Suisse names AM brands with winning ESG approaches
- ²² DWS (30 June 2020). Environmental Finance, Sustainable Investment Awards 2020. The 2020 Sustainable Investment Awards seek to recognise asset managers, analysts and data providers incorporating ESG across all asset classes -- fixed income, listed and private equity, debt funds, multi asset funds, infrastructure funds and fund of funds.
- ²³ DWS (March 2020). Sustainability Report 2019

Important information

DWS is the brand name of DWS Group GmbH & Co. KGaA and its subsidiaries under which they operate their business activities. The respective legal entities offering products or services under the DWS brand are specified in the respective contracts, sales materials and other product information documents. DWS, through DWS Group GmbH & Co. KGaA, its affiliated companies and its officers and employees (collectively "DWS") are communicating this document in good faith and on the following basis.

This document has been prepared without consideration of the investment needs, objectives or financial circumstances of any investor. Before making an investment decision, investors need to consider, with or without the assistance of an investment adviser, whether the investments and strategies described or provided by DWS Group, are appropriate, in light of their particular investment needs, objectives and financial circumstances. Furthermore, this document is for information/discussion purposes only and does not constitute an offer, recommendation or solicitation to conclude a transaction and should not be treated as giving investment advice.

The document was not produced, reviewed or edited by any research department within DWS and is not investment research. Therefore, laws and regulations relating to investment research do not apply to it. Any opinions expressed herein may differ from the opinions expressed by other legal entities of DWS or their departments including research departments.

The information contained in this document does not constitute a financial analysis but qualifies as marketing communication. This marketing communication is neither subject to all legal provisions ensuring the impartiality of financial analysis nor to any prohibition on trading prior to the publication of financial analyses.

This document contains forward looking statements. Forward looking statements include, but are not limited to assumptions, estimates, projections, opinions, models and hypothetical performance analysis. The forward looking statements expressed constitute the author's judgment as of the date of this document. Forward looking statements involve significant elements of subjective judgments and analyses and changes thereto and/ or consideration of different or additional factors could have a material impact on the results indicated. Therefore, actual results may vary, perhaps materially, from the results contained herein. No representation or warranty is made by DWS as to the reasonableness or completeness of such forward looking statements or to any other financial information contained in this document. Past performance is not guarantee of future results.

We have gathered the information contained in this document from sources we believe to be reliable; but we do not guarantee the accuracy, completeness or fairness of such information. All third party data are copyrighted by and proprietary to the provider. DWS has no obligation to update, modify or amend this document or to otherwise notify the recipient in the event that any matter stated herein, or any opinion, projection, forecast or estimate set forth herein, changes or subsequently becomes inaccurate.

Investments are subject to various risks, including market fluctuations, regulatory change, possible delays in repayment and loss of income and principal invested. The value of investments can fall as well as rise and you might not get back the amount originally invested at any point in time. Furthermore, substantial fluctuations of the value of any investment are possible even over short periods of time. The terms of any investment will be exclusively subject to the detailed provisions, including risk considerations, contained in the offering documents. When making an investment decision, you should rely on the final documentation relating to any transaction.

No liability for any error or omission is accepted by DWS. Opinions and estimates may be changed without notice and involve a number of assumptions which may not prove valid. DWS or persons associated with it may (i) maintain a long or short position in securities referred to herein, or in related futures or options, and (ii) purchase or sell, make a market in, or engage in any other transaction involving such securities, and earn brokerage or other compensation.

DWS does not give taxation or legal advice. Prospective investors should seek advice from their own taxation agents and lawyers regarding the tax consequences on the purchase, ownership, disposal, redemption or transfer of the investments

and strategies suggested by DWS. The relevant tax laws or regulations of the tax authorities may change at any time. DWS is not responsible for and has no obligation with respect to any tax implications on the investment suggested.

This document may not be reproduced or circulated without DWS written authority. The manner of circulation and distribution of this document may be restricted by law or regulation in certain countries, including the United States.

This document is not directed to, or intended for distribution to or use by, any person or entity who is a citizen or resident of or located in any locality, state, country or other jurisdiction, including the United States, where such distribution, publication, availability or use would be contrary to law or regulation or which would subject DWS to any registration or licensing requirement within such jurisdiction not currently met within such jurisdiction. Persons into whose possession this document may come are required to inform themselves of, and to observe, such restrictions.

Issued in the UK by DWS Investments UK Limited which is authorised and regulated by the Financial Conduct Authority (Reference number 429806).

© 2020 DWS Investments UK Limited

© 2020 DWS Investment GmbH

In Hong Kong, this document is issued by DWS Investments Hong Kong Limited and the content of this document has not been reviewed by the Securities and Futures Commission.

© 2020 DWS Investments Hong Kong Limited

In Singapore, this document is issued by DWS Investments Singapore Limited and the content of this document has not been reviewed by the Monetary Authority of Singapore.

© 2020 DWS Investments Singapore Limited

In Australia, this document is issued by DWS Investments Australia Limited (ABN: 52 074 599 401) (AFSL 499640) and the content of this document has not been reviewed by the Australian Securities Investment Commission.

© 2020 DWS Investments Australia Limited

Global Compliance Code CRC: 076843_1.0 (29 June 2020)

Important information - United States

For institutional client and registered representative use only. Not for public viewing or distribution.

The opinions and forecasts expressed herein are as of April 2020, are subject to change and may not cometo pass.

The brand DWS represents DWS Group GmbH & Co. KGaA and any of its subsidiaries such as DWS Distributors, Inc. which offers investment products or DWS Investment Management Americas, Inc. and RREEF America L.L.C. which offer advisory services.

DWS Distributors, Inc. 222 South Riverside Plaza Chicago, IL 60606-5808 www.dws.com rep@dws.com Tel (800) 621-1148

© 2020 DWS Group GmbH & Co. KGaA. All rights reserved. U.S. Compliance code: I- 076869-1 (6/20)