



The Metropolitan Thames Valley 2019 Pension Scheme

28 February 2023

Background and Implementation Statement

Background

The regulatory landscape continues to evolve as ESG becomes increasingly important to regulators and society. The Department for Work and Pensions ("DWP") has increased the focus around environmental, social and governance ("ESG") policies and stewardship activities by issuing further regulatory guidance relating to voting and engagement policies and activities. These regulatory changes recognise the importance of managing ESG factors as part of a trustee's fiduciary duty.

Implementation Statement

This Implementation Statement is to provide evidence that the Metropolitan Thames Valley 2019 Pension Scheme (the "Scheme") continues to follow and act on the principles outlined in the Statement of Investment Principles (the "SIP"). The Scheme's current SIP is dated May 2023.

The Implementation Statement details:

- actions the Scheme has taken to manage financially material risks and implement the key policies in its SIP;
- the current policy and approach with regards to ESG and the actions taken with managers on managing ESG risks;
- the extent to which the Scheme has followed policies on engagement covering engagement actions with its fund managers and in turn the engagement activity of the fund managers with the companies in the investment mandate; and
- voting behaviour covering the reporting year up to 28 February 2023 for and on behalf of the Scheme including the most significant votes cast by the Scheme or on its behalf.

Summary of key actions undertaken over the Scheme reporting year

In August 2022 a new investment strategy for the Scheme was agreed. This new strategy targeted a return of 2.6% per annum above the return on UK Government bonds, down from a margin of 2.9%. The new strategy increased the Scheme's strategic interest rate and inflation hedge from 95% to 100%. This strategy reduced the allocation to Equity-Linked Liability Driven Investment ("LDI") and Low Risk Multi Asset Credit but increased the allocation to Diversified Alternatives.

Post reporting year end, the Trustee agreed to implement a new investment strategy. The newly agreed strategy lowers the Scheme's hedge to 80% and the Scheme's return to 2.4% per annum above the return on UK Government bonds. The strategy removes the allocation to Equity-Linked LDI Funds and introduces a new Infrastructure holding, diversifying the range of asset classes the Scheme invests in. A new SIP and Investment Implementation Document ("IID") were signed to reflect these changes and to account for new regulations.

Implementation Statement

This report demonstrates that the Scheme has adhered to its investment principles and its policies for managing financially material consideration including ESG factors and climate change.

Managing risks and policy actions

Risk / Policy	Definition	Policy	Actions and details on changes to policy
Investment	The risk that the Scheme's position deteriorates due to the assets underperforming.	To select an achievable investment objective and investing in a diversified portfolio of assets.	The Scheme has an achievable expected return and aims to achieve this by investing across a range of asset classes.
Funding	The extent to which there are insufficient Scheme assets available to cover ongoing and future liability cashflows.	The Trustee will agree an appropriate basis in conjunction with the investment strategy to ensure an appropriate journey plan is agreed to manage funding risk over time.	The long-term objective and journey plan is discussed when reviewing and refreshing the Scheme's investment strategy.
Covenant	The risk that the sponsoring company becomes unable to continue providing the required financial support to the Scheme.	The Trustee to consider the covenant strength ensuring the Scheme is exposed to an appropriate level of risk for the covenant to support.	The covenant strength is discussed when reviewing and refreshing the Scheme's investment strategy.
Interest rates and inflation	The risk of mismatch between the value of the Scheme assets and present value of liabilities from changes in interest rates and inflation expectations.	<p>To invest in matching assets that move in line with the present value of the scheme liabilities.</p> <p>During the reporting period, the Scheme targeted a hedge of 100% of these risks.</p> <p>Under the current SIP, the Scheme hedges 80% of these risks.</p>	<p>Over the reporting period, the Scheme had allocations to both Equity-Linked LDI and LDI funds, which aim to hedge part of the Scheme's inflation and interest rate risk.</p> <p>Post year end, the Trustee agreed to disinvest from the Scheme's Equity-Linked LDI Funds following the advice from the Scheme's investment advisers.</p>
Liquidity	Difficulties in raising sufficient cash when required without adversely impacting the fair market value of the investment.	To maintain a sufficient allocation to liquid assets so that there is a prudent buffer to pay members benefits as they fall due (including transfer values) and to provide collateral to the LDI manager.	The Scheme's assets are traded on a daily frequency, providing sufficient liquidity.

Market	Experiencing losses due to factors that affect the overall performance of the financial markets.	To remain appropriately diversified and hedge away any unrewarded risks, where practicable.	The Scheme invests in a range of pooled funds which comprise of underlying holdings across several asset classes. The Trustee is satisfied that the Scheme's exposure to market risk is reasonably reduced through asset diversification.
Credit	Default on payments due as part of a financial security contract.	To diversify this risk by investing in a range of credit markets across different geographies and sectors where possible.	The Scheme invests in pooled credit funds which invest across a variety of geographies and sectors, diversifying the underlying credit risk.
Environmental, Social and Governance	Exposure to ESG factors, including but not limited to climate change, which can impact the performance of the Scheme's investments.	<p>To appoint managers who satisfy the following criteria, unless there is a good reason why the manager does not satisfy each criteria:</p> <ol style="list-style-type: none"> 1. Has a Responsible Investment ('RI') Policy / Framework 2. Implemented via the Investment Process 3. A track record of using engagement and any voting rights to manage ESG factors 4. UN PRI Signatory. 	<p>As part of the investment management of the Scheme's assets, the Trustee expects the investment managers to make decisions on:</p> <ul style="list-style-type: none"> • The selection, retention and realisation of investments taking into account all financially material considerations. • The exercise of rights (including voting rights) attached to these investments. • Undertaking engagement activities with investee companies and other stakeholders where appropriate.
Currency	The potential for adverse currency movements to have an impact on the Scheme's investments.	To invest in GBP denominated share classes where possible.	All the Scheme's investments are in GBP denominated share classes.
Non-financial	Any factor that is not expected to have a financial impact on the Scheme's investments.	Non-financial matters are not taken into account in the selection, retention or realisation of investments.	

Changes to the SIP

In August 2022 a new SIP was signed to implement an updated investment strategy for the Scheme. The new SIP decreased the expected return from 2.9% per annum above the return on UK Government Bonds to 2.6% per annum and set a specific target to hedge 100% of interest rate and inflation risks, which was previously 95%.

Following the Scheme year end an investment strategy review was undertaken, with an alternative strategy being agreed to by the Trustee and the Scheme's principal employer. The alternative strategy takes into account the need for schemes to have sufficient collateral and liquidity to back any LDI assets following the market volatility and Gilt crisis over Q3 and Q4 2022. The new strategy removes the Scheme's exposure to Equity-Linked LDI Funds and introduces an allocation to the Infrastructure Investment Fund. A new SIP was signed in May 2023 to reflect the agreed strategy changes and changes to regulatory requirements.

Policies added to the SIP post reporting period

Voting Policy - How the Trustee expects investment managers to vote on their behalf.

- The Trustee has acknowledged responsibility for the voting policies that are implemented by the Scheme's investment managers on its behalf.

Engagement Policy - How the Trustee will engage with investment managers, direct assets and others about 'relevant matters'.

- The Trustee has acknowledged responsibility for the engagement policies that are implemented by the Scheme's investment managers on its behalf.
- The Trustee, via its investment advisers, will engage with managers about 'relevant matters' at least annually.

Implementing the current ESG policy and approach

ESG as a financially material risk

The SIP describes the Scheme's policy with regards to ESG as a risk as it potentially could have a material impact on investment risk and return outcomes. The Trustee also recognises that long-term sustainability issues, particularly climate change, present risks and opportunities that increasingly may require explicit consideration. This section details how the Scheme's ESG policy is implemented.

The assets of the Scheme are invested in pooled vehicles and the Trustee accepts that pooled investments will be governed by the individual policies of the investment manager. These policies are reviewed as part of the consideration of pooled investments. As such, the Trustee has given its investment managers full discretion in evaluating ESG factors, including climate change considerations, exercising voting rights and stewardship obligations attached to the investments, in accordance with their own corporate governance policies and current best practice, including the UK Corporate Governance Code and UK Stewardship Code.

The Trustee is increasingly considering how ESG, climate change and stewardship is integrated within investment processes in appointing new investment managers and monitoring the existing investment managers. The Trustee will consider the ESG ratings provided by their Investment Advisor and/or platform provider on how the investment manager embeds ESG factors into its investment process. A change in ESG rating (or lack of ESG rating) does not mean that the fund will be removed or replaced automatically.

Implementing the current ESG policy

The following table outlines the areas by which the Scheme's investment managers are assessed on when evaluating their ESG policies. The Trustee will review the Scheme's ESG policies and engagements periodically to ensure they remain fit for purpose.

Areas for monitoring and engagement	Method for monitoring and engagement	Circumstances for additional monitoring and engagement
Environmental, Social, Corporate Governance factors and the exercising of rights.	The Trustee receives information from its investment advisors/platform provider on the investment managers' approaches to engagement.	<p>The manager has not acted in accordance with their policies and frameworks.</p> <p>The manager's policies are not in line with the Trustee's policies in this area.</p>

Through the engagement described above, the Trustee will work with its investment advisors and/or managers to improve its alignment with the above policies. Where sufficient improvement is not observed, the Trustee will review the relevant investment manager's appointment and will consider terminating the arrangement.

Engagement and Voting

The Trustee has appointed Mobius Life as the platform provider which implements policies on its behalf. Mobius Life has adopted the managers' definition of significant votes and has not set stewardship priorities. The managers have provided examples of votes they deem to be significant, and Mobius Life has shown the votes relating to the greatest exposure within the Scheme's investment. When requesting data annually, Mobius Life informs the managers what they deem most significant.

Please see attached document from Mobius Life for details on engagement and voting actions including a summary of the activity, covering the 12-month period ending 28 February 2023.

The Metropolitan Valley 2019 Pension Scheme

ESG REPORT – 28-Feb-2023



Scheme: The Metropolitan Valley 2019 Pension Scheme

Statement Date: 28-Feb-2023

Fund	Value (£)	% Holding
Schroder Life Intermediated Diversified Growth Fund	14,154,431.11	10.48%
M&G Total Return Credit Investment Fund	2,173,843.57	1.61%
Apollo Total Return Fund	27,810,462.68	18.41%
Insight LDI Enhanced Selection Longer Real Fund	24,876,435.22	18.41%
Insight LDI Enhanced Selection Shorter Real Fund	9,112,850.09	6.74%
CT LDI Equity-linked Real Dynamic LDI Sub-Fund	29,502,548.13	21.83%
CT Sterling Liquidity Fund	3,707,597.47	2.74%
CT LDI Equity-linked Nominal Dynamic LDI Sub-Fund	5,410,901.85	4.00%
Partners Group Generations Fund	10,509,513.94	7.78%
JPM Unconstrained Bond Fund	7,864,555.57	5.82%

Fund	Fund Manager ESG Credentials	Fund ESG Credentials	
	Data Provided by FM as at	% Qs answered	Data Provided by FM as at
CT LDI Equity-linked Real Dynamic LDI Sub-Fund	31/12/2022	75	31/12/2022
Insight LDI Enhanced Selection Shorter Real Fund	31/12/2022	75	31/12/2022
CT LDI Equity-linked Nominal Dynamic LDI Sub-Fund	31/12/2022	75	31/12/2022
JPM Unconstrained Bond Fund	31/12/2022	90	31/12/2022
Apollo Total Return Fund	31/12/2022	85	31/12/2022
M&G Total Return Credit Investment Fund	31/12/2022	90	31/12/2022
Partners Group Generations Fund	31/12/2022	100	31/12/2022
Insight LDI Enhanced Selection Longer Real Fund	31/12/2022	75	31/12/2022
Schroder Life Intermediated Diversified Growth Fund	31/12/2022	84	31/12/2022
CT Sterling Liquidity Fund	31/12/2022	75	31/12/2022

Disclaimer:

This report has been designed by Mobius Life to support Pension Schemes. Mobius Life understand the information produced in this report may be used as an input for an implementation statement but is not responsible for producing the implementation statement. When compiling this report, Mobius Life has shared all the information provided by the external fund manager. Where a response field is blank this means the question is not applicable or a response was not provided by the fund manager.

Mobius Life accepts no responsibility or liability for the accuracy or content of the data provided by the external fund managers.

Fund Manager Business Response

Questions	Columbia Threadneedle Investments		
Do you have an ESG policy that is integrated into the investment process?	Yes Yes	Are Senior Management accountable for ESG or Climate Change risks?	Yes Yes
Do you have a firm ESG rating?	Yes	Do you have a dedicated team that considers ESG and Climate Change related factors?	Yes Yes
Please provide your UNPRI survey scores	Strategy & Governance: A+ Listed Equity - Incorporation: A+ Listed Equity - Active Ownership: A+ Fixed Income - SSA: A Fixed Income - Corporate Non-Financial (New): A Fixed Income - Corporate Non-Financial: A Private Equity (New): A Property (New): B	Do you rely on any third parties to provide ESG and Climate Change related analysis/research?	Yes MSCI ESG: Our primary source for ESG data. MSCI ESG data and analysis is used to systematically screen client portfolios for ESG risks, identify priority companies for engagement and to inform company analysis. ISS: ISS supplies us with custom research based on our own in-house corporate governance guidelines (which are updated annually based on country-specific best practice standards). Research provided by ISS is used to inform our vote execution as well as company engagement. Broker Research: All members of the Responsible Investment team have access to broker research. The team uses this content to stay on top of market trends, identify companies for engagement and to inform company, market or topic specific research. Examples of Brokers with solid ESG offerings include Kepler Cheuvreux, Natixis, Societe Generale, HSBC and Morgan Stanley. Sustainalytics: Used for landmine and cluster munition screening. Bloomberg: Bloomberg terminals are used to perform qualitative as well as quantitative analysis on a multitude of topics. In particular, Bloomberg has proven useful for linking ESG with financial data to determine the materiality of particular ESG issues. Non-Governmental Organisations(NGO's): Examples include Transparency International (anti-corruption), Oxfam, CERES and Human Rights Watch. Research provided by NGO's is used to identify priority companies and identify priority companies for engagement. Other: Our research is also informed by our networks that may provide briefings and publications, including the UN PRI, International Corporate Governance Network and Asian Corporate Governance Association.
Do you have a Climate Change policy that is integrated into the investment process?	Yes Yes	Do you create your own ESG or Climate Change related scores	Yes Yes
Does your company have a policy on equality and diversity in the workplace?	Yes Yes	Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?	Yes Yes - Quarterly and annually
Do ESG related factors get considered with respect to performance management of investment companies and funds?	Yes	Are you signatories of the FRC UK Stewardship Code or equivalent?	Yes Yes

Fund Manager Business Response

Questions	Insight Investment		
Do you have an ESG policy that is integrated into the investment process?	Yes Yes	Are Senior Management accountable for ESG or Climate Change risks?	Yes Yes, the Insight Responsible Oversight Committee (IROC) is the principle governance group with oversight and accountability for responsible investment across investment, commercial development and communications activities, and corporate and social responsibility (CSR) programmes. The purpose of the Committee is to set the strategic priorities and apply appropriate oversight to ensure responsible investment and CSR performance aligns with Insight's organisational objectives. The Committee's focus includes climate change including oversight and accountability for climate strategy and policy, as well as overseeing investment and operational activities. Additionally, the IROC oversees a range of sub-governance groups focused on different aspects of our commitment to responsible investment on behalf of our clients. These governance groups include representation from investment, client, commercial, operations, product, legal, risk and marketing divisions. Joshua Kendall, Head of Responsible Investment Research and Stewardship, has responsibility, along with our Corporate Risk Team, for managing the scope, procedures and documentation for each group, which is described in full within the terms of reference documentation reviewed and approved by the IROC.
Do you have a firm ESG rating?	No	Do you have a dedicated team that considers ESG and Climate Change related factors?	Yes Yes, Insight's approach to responsible investment is the responsibility of the relevant investment teams and decision-makers, supported by our dedicated Responsible Investment Team. The Responsible Investment Team is co-led by Robert Sawbridge (Head of Responsible Investment Solutions) and Joshua Kendall (Head of Responsible Investment Research and Stewardship). Rob and Josh are supported by Nimisha Sodha (ESG Analyst), Tudor Thomas (ESG Quantitative Researcher) and Alex Verissimo (ESG Analyst).
Please provide your UNPRI survey scores	2020 Scores: Strategy & Governance: A+ Fixed Income - SSA: A+ Fixed Income - Corporate Financial: A+ Fixed Income - Corporate Non-Financial: A+ Fixed Income - Securitised: A+	Do you rely on any third parties to provide ESG and Climate Change related analysis/research?	No To assist with our governance assessment and how a company's management team responds to environmental and social issues, we use our proprietary risk-centric, corporate Insight ESG score, Prime. This quantitative framework effectively integrates our analysts' research, and supplemented with data from multiple third-party data providers, generates an ESG rating and momentum signal for a wide range of entities. We incorporate raw ESG data from four full ESG datasets; MSCI, Sustainalytics, VigeoEiris, and CDP climate change and water metrics. We also use the Bloomberg legal entities for credit risk datasets to map the ESG records to all issuers within a credit risk tree. Raw data from these data providers is mapped and assigned global company identifiers and ultimate parent identifiers before being added to our ESG database. ESG data can provide evidence that management has adopted and implemented appropriate policies, systems and controls to manage risks and comply with relevant codes, laws and regulations, and go beyond them to meet the expectations of key stakeholders.
Do you have a Climate Change policy that is integrated into the investment process?	Yes Yes. Our purpose is to create investment solutions that give clients financial certainty. This cannot come at the expense of a deteriorating natural environment or unmanageable climate-related events. We believe Insight has a responsibility to manage environment-related risks and outcomes for our clients. It is important to examine broader environmental issues than	Do you create your own ESG or Climate Change related scores	No

Questions	Insight Investment		
	<p>climate change alone because we identify broader impacts from climate issues, such as on water, biodiversity, land, waste, marine life and health. Delivering on our commitment is a holistic responsibility, affecting our corporate actions, the investments we make, and interactions with the wider financial community.</p> <p>The Insight Environment Policy</p> <ol style="list-style-type: none"> 1. Minimise the environmental impact of our corporate activities 2. Deliver clients investment solutions aligned with their environmental objectives 3. Strive to hold issuers accountable for their environmental responsibilities 4. Manage investment environment risks and support environmental transition activities 5. Operate internal processes to manage environmental risk issues and deliver transparency 		
Does your company have a policy on equality and diversity in the workplace?	<p>Yes</p> <p>Yes, it is the policy of Insight and all its entities, to provide equal employment opportunity to all applicants and employees by establishing employment practices that provide for non-discriminatory treatment in accordance with all applicable laws, regulations and orders. Insight is committed to providing equal employment opportunities to all employees and applicants by establishing employment practices and terms, conditions and privileges of employment regardless of race, disability, religion or belief or creed, colour, gender or sex, gender re-assignment, national origin, age, marriage or civil partnership, ancestry, citizenship, ethnic origin, sexual orientation, pregnancy or maternity or other factors prohibited by law. This policy has the full support and commitment of the Chief Executive Officer and senior management of the company.</p>	<p>Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?</p>	<p>Yes</p> <p>The sixth point of our Responsible Investment Policy states that we aim to deliver on our commitments and our beliefs by exercising transparency and disclosing our activities. We believe we should be held accountable for the actions that we take and for the outcomes that we achieve. We report annually on our approach to responsible investment. We discuss our actions and their impact to reflect on our successes and failures, to highlight the lessons we have learned and to set out our priorities for action.</p> <p>Clients invested in corporate credit are able to receive ESG reporting as part of their monthly, quarterly or annual reporting requirements, regardless of whether their mandate includes specific ESG exclusions, constraints or targets. This includes Insight's proprietary risk-centric, corporate Insight ESG score, Prime, and carbon footprint data.</p> <p>For mandates that are managed with bespoke ESG criteria, we have vast experience in providing clear and transparent reporting that is highly customised, to reflect the specific guidelines, restrictions, customised exclusion lists, impact themes and ESG filters.</p> <p>Additionally, we work with clients to create bespoke ESG reporting, including themes such as engagement, positive impact and Paris alignment.</p>
Do ESG related factors get considered with respect to performance management of investment companies and funds?	<p>Yes</p>	<p>Are you signatories of the FRC UK Stewardship Code or equivalent?</p>	<p>No</p> <p>We submitted responses to the FRC on 16 March 2021 and received feedback on 1 September 2021 that our submission was unsuccessful. Whilst our Stewardship Report had not met the standard to become a signatory on this occasion, we are confident that addressing the areas identified in FRC's feedback will make our next application more likely to be successful. For example, our report referred to other documents to evidence our stewardship activity. However, our Stewardship Report needed to demonstrate our application of the principles and reporting expectations in a single document. FRC did not review these other documents in their assessment, and we believe that by including some of this information within our revised report it will lead to a successful re-application. To support our re-application to be recognised as a signatory to the Code, we have fully addressed this and other feedback in the redraft, including sourcing an external review of the revised submission. We provided the FRC with an updated submission which we are confident addresses all the areas that were highlighted as inadequate by the</p>

Fund Manager Business Response

Questions	Insight Investment		
			FRC. We expect a response from FRC in due course.

Questions	JP Morgan Asset Management (JPMorgan)		
Do you have an ESG policy that is integrated into the investment process?	Yes Yes	Are Senior Management accountable for ESG or Climate Change risks?	Yes Yes
Do you have a firm ESG rating?	Yes Yes	Do you have a dedicated team that considers ESG and Climate Change related factors?	Yes Yes
Please provide your UNPRI survey scores	2020 scores: Strategy & Governance: A+ Private Equity: A Listed Equity - Incorporation: A Listed Equity - Active Ownership: B Fixed Income - SSA: A Fixed Income - Corporate Financial: B Fixed Income - Corporate Non-Financial: B Fixed Income - Securitised: B Private Equity: A Property: A Infrastructure: A	Do you rely on any third parties to provide ESG and Climate Change related analysis/research?	No No
Do you have a Climate Change policy that is integrated into the investment process?	Yes Yes	Do you create your own ESG or Climate Change related scores	Yes Yes
Does your company have a policy on equality and diversity in the workplace?	Yes Yes	Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?	Yes Yes. More often than quarterly.
Do ESG related factors get considered with respect to performance management of investment companies and funds?	Yes Yes	Are you signatories of the FRC UK Stewardship Code or equivalent?	Yes Yes

Questions	Apollo Global Management, LP		
Do you have an ESG policy that is integrated into the investment process?	Yes Yes. In 2020, Apollo revised its Responsible Investing and ESG Policy with specific sub-policies for each asset class and for Apollo as a firm.	Are Senior Management accountable for ESG or Climate Change risks?	Yes Yes. Sustainability and ESG are discussed weekly in Apollo's Management Committee. Firm-wide decisions on ESG issues are made at the most senior level, led by the firm's ESG Steering Committee, which is chaired by Apollo's Global Head of ESG and includes Apollo's Chief Sustainability Officer and certain members of the Executive and Management Committees.

Fund Manager Business Response

Questions	Apollo Global Management, LP		
			Apollo's Chief Sustainability Officer, together with Apollo's Sustainability and Corporate Responsibility Committee and the relevant dedicated responsible investment professionals, are responsible for internal oversight and reporting of ESG and Responsible Investing policy implementation.
Do you have a firm ESG rating?	No	Do you have a dedicated team that considers ESG and Climate Change related factors?	<p>Yes</p> <p>Yes. Apollo has made recent investments in leadership and expertise roles in areas of ESG and sustainability. These recent investments build upon Apollo's long-standing ESG program. The firm's broader sustainability strategy will be overseen by the firm's Chief Sustainability Officer.</p> <p>The ESG Steering Committee, which is comprised of certain members of the firm's Executive and Management Committees and numerous investment professionals with respect to both general and specific ESG issues, draws on recommendations from Apollo's cross-functional Green Teams from the Credit, Private Equity, and Real Assets businesses. Also, Dave Stangis, a Senior Partner and Chief Sustainability Officer, leads Apollo's sustainability strategy and reports to Mr. Kleinman and Mr. Zelter. Mr. Stangis also partners with Ms. Medley to build upon Apollo's long-standing ESG program.</p> <p>Apollo's ESG efforts are supported by an ESG team at Apollo including ESG counsel and associates, as well as a dedicated ESG team at Paul, Weiss, Rifkind, Wharton & Garrison LLP.</p>
Please provide your UNPRI survey scores	Apollo became a signatory in October 2020 and Apollo's Transparency Report and Assessment Reports are not yet available.	Do you rely on any third parties to provide ESG and Climate Change related analysis/research?	<p>Yes</p> <p>Our investment teams will leverage publicly disclosed information directly from the issuers as well as access to ESG data services such as Bloomberg for raw ESG data KPIs and SESAMm for natural language processing data and analytics associated with ESG risks and opportunities. We are currently evaluating multiple other data providers to assist but not replace our evaluation of ESG credit risks within our investment process. We are currently evaluating the potential for undertaking physical climate risk assessment for this fund. As it pertains to climate, we are currently evaluating both internal and external material data that is relevant for a specific issuer based on widely accepted ESG materiality frameworks.</p>
Do you have a Climate Change policy that is integrated into the investment process?	<p>Yes</p> <p>Climate is integrated within the environmental aspect of Apollo's Responsible Investing and ESG policy.</p>	Do you create your own ESG or Climate Change related scores	<p>Yes</p> <p>In Apollo's credit business, analysts prepare proprietary ESG risk scores for the majority of corporate credit issuers. The risk management of the fund's exposure to sustainability risk is based on our internal ESG credit rating process and oversight. While fundamental oversight of all credit risks (including ESG risks) are the responsibility of each individual investment team, our highest risk ESG ratings across the E, S and G pillars of a particular issuer require additional review. Investors are required to present a detailed analysis of the sustainability risks as well as risk mitigants that may support continued exposure. Outcomes from this ESG credit risk assessment may include divestment, reduction in exposure and/or engagement on material ESG issues. Additionally, our ESG credit ratings leverage our technology platform with the highest risk ESG credit ratings distributed for review to investment teams on a daily basis.</p> <p>ESG Corporate Credit Rating Sample Template In Apollo's sector-based ESG credit overall score and momentum:</p> <ol style="list-style-type: none"> 1) analysts consider identified qualitative and quantitative ESG factors; 2) ESG credit risk ratings are assigned to applicable subthemes; 3) momentum scores are assigned to pillars, enabling reflection of a forward-

Fund Manager Business Response

Questions	Apollo Global Management, LP		
			looking trajectory; 4) overall and pillar ESG credit risk ratings are automatically generated by weight; and 5) explanation for E, S, G, and overall ratings are provided.
Does your company have a policy on equality and diversity in the workplace?	Yes Yes	Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?	Yes At a firm level, Apollo provides regular updates about its ESG program to limited partners through its ESG Annual Report.
Do ESG related factors get considered with respect to performance management of investment companies and funds?	Yes	Are you signatories of the FRC UK Stewardship Code or equivalent?	No While Apollo is not currently a signatory to the UK Stewardship Code, we are currently in the process of evaluating joining it. However, as of October 2020, Apollo is a signatory to UNPRI and the Operating Principles for Impact Management. Apollo is also a member of the SASB Alliance, the Ceres Investor Network on Climate Risk and Sustainability, the ESG Data Convergence Project, Impact Capital Managers, the ILPA Diversity in Action Initiative, the Board Diversity Action Alliance, CEO Action Coalition for Diversity & Inclusion, and the Thirty Percent Coalition. Apollo has aligned its ESG Report Volume 12 with the UN Sustainable Development Goals ("SDGs") and the Global Reporting Initiative ("GRI") Standards.

Questions	M&G Investments		
Do you have an ESG policy that is integrated into the investment process?	Yes On 1 January 2022, M&G published its ESG Investment Policy. This further sets out our principles-based approach to addressing ESG matters in investing, and policies for specific ESG matters that must be applied by the asset manager across all asset classes. The Policy is owned by the Chief Investment Officer (CIO) or their delegated deputy, and will be refreshed at least annually. Updates to the new policy can be summarised by the below bullet points: - M&G's new ESG priorities for the year (Climate Change and Diversity and Inclusion) - Inclusion of M&G's Climate change objectives (becoming Net Zero as an organisation by 2030, and achieve Net Zero investment portfolios by 2050 across the group's total assets under management, to align with the Paris Agreement. - Addition of the ESG Governance structure of the group - Details of M&G's ESG Investment principles, which we use to inform and guide all investments made as an asset manager. These principles are consistent with M&G plc's ESG principles and reflect the firm's purpose and corporate values	Are Senior Management accountable for ESG or Climate Change risks?	Yes Yes

Fund Manager Business Response

Questions	M&G Investments		
	<p>of Care and Integrity.</p> <ul style="list-style-type: none"> - Details of M&G's ESG integration approach across all asset classes. - Further information on M&G's Engagement and Exclusion approaches. 		
Do you have a firm ESG rating?	Yes	Do you have a dedicated team that considers ESG and Climate Change related factors?	<p>Yes</p> <p>Yes</p>
Please provide your UNPRI survey scores	<p>We are advised not to report individual scores. Please see our 2021 UNPRI Assessment report attached to be read in conjunction with following Transparency link and UNPRI Assessment Method:</p> <p>Transparency Report</p> <p>2021 Assessment Methodology</p>	Do you rely on any third parties to provide ESG and Climate Change related analysis/research?	<p>Yes</p> <p>Yes, MSCI, ISS, Eikon & RepRisk</p>
Do you have a Climate Change policy that is integrated into the investment process?	<p>Yes</p> <p>Yes</p>	Do you create your own ESG or Climate Change related scores	<p>Yes</p> <p>Yes, we have proprietary ESG scorecards to capture our ESG analysis.</p>
Does your company have a policy on equality and diversity in the workplace?	<p>Yes</p> <p>Yes</p>	Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?	<p>Yes</p> <p>Yes, we publish firm wide periodic reports and we also publish fund related information on our website.</p>
Do ESG related factors get considered with respect to performance management of investment companies and funds?	<p>Yes</p> <p>Yes</p>	Are you signatories of the FRC UK Stewardship Code or equivalent?	<p>Yes</p> <p>Yes, we are signatories to UK stewardship code.</p>

Questions	Partners Group AG		
Do you have an ESG policy that is integrated into the investment process?	<p>Yes</p> <p>Yes. Partners Group aims to realize potential in private markets and create sustainable returns with a lasting, positive impact for all of its stakeholders, in line with its fiduciary duty and return-generating goals.</p>	Are Senior Management accountable for ESG or Climate Change risks?	<p>Yes</p> <p>André Frei, former Co-CEO and now Chairman of Sustainability of Partners Group, is responsible for the firm's overall sustainability strategy. In this role he prioritizes and coordinates portfolio and corporate sustainability efforts, in interaction with the Partners Group's Executive Committee.</p>
Do you have a firm ESG rating?	<p>Yes</p> <p>Partners Group has become the only global private markets firm to be included in the Dow Jones Sustainability Indices (DJSI), reflecting the firm's position as a corporate sustainability leader in private markets.</p>	Do you have a dedicated team that considers ESG and Climate Change related factors?	<p>No</p> <p>The ESG team is embedded within the wider investment team and has responsibility for the framework that guides investment DD and monitoring. The team also engages with the portfolio businesses</p>

Fund Manager Business Response

Questions	Partners Group AG		
Please provide your UNPRI survey scores	5 stars: Private Equity; 4 stars: Investment & Stewardship Policy, Infrastructure, Debt; 3 stars: Real estate	Do you rely on any third parties to provide ESG and Climate Change related analysis/research?	Yes As a private markets firm, we conduct the most part of our ESG & Sustainability research ourselves. Prior to investing Partners Group engages external service providers including: EY, PwC, KPMG, ERM, Ramboll. During ownership Partners Group uses the services of ESG providers including: Sancroft and Gallup
Do you have a Climate Change policy that is integrated into the investment process?	Yes Yes. While addressing climate change will require action from governments and society, we believe that private market investment managers and investors are uniquely positioned to support the transition to a low-carbon economy through systematic assessment and management of climate risks and opportunities.	Do you create your own ESG or Climate Change related scores	No Not provided
Does your company have a policy on equality and diversity in the workplace?	Yes Yes. The Diversity and Inclusion Policy ("Policy") sets forth Partners Group's commitment to promoting a diverse and inclusive workplace, articulates guiding principles and ambitions towards diversity and inclusion, and specifies the organization and responsibilities of the groups charged with advancing Partners Group's diversity and inclusion initiatives. In addition to affirming Partners Group's values, the Policy constitutes the basis for effective diversity and inclusion management at Partners Group, and what the company believes best supports its business, clients, and people.	Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?	Yes Depending on the product Partners Group includes ESG related topics in monthly/quarterly reports. Partners Group also produces an annual CSR report with key ESG updates, including the publication of the ESG dashboards for each asset class - within these dashboards each asset is tracked and measured across key KPIs
Do ESG related factors get considered with respect to performance management of investment companies and funds?	Yes Yes	Are you signatories of the FRC UK Stewardship Code or equivalent?	No Partners Group is not a signatory to the code. Note that given the UK Stewardship Code only applies to UK funds, only our Generations Fund would fall under direct scope (our other programs are domiciled in Luxembourg, Guernsey etc.)

Questions	Schroders Investment Management Limited		
Do you have an ESG policy that is integrated into the investment process?	Yes Our Environmental, Social and Governance (ESG) Policy is available on our website at: https://prod.schroders.com/en/sysglobalassets/global-assets/english/campaign/sustainability/integrity-documents/schroders-esg-policy.pdf Our ESG policy applies across our managed assets and outlines our commitments to ESG integration, our approach to active ownership (including voting) and our policy around exclusions. At Schroders, we invest in a wide range of asset classes and therefore our policy contains specific comments on company investments, sovereigns and other asset classes such as convertible bonds, structured credit and insurance linked securities. Our policy also contains a section on our corporate	Are Senior Management accountable for ESG or Climate Change risks?	Yes Schroders' Group Chief Executive leads our ESG executive committee and retains overall responsibility for the firm's sustainability strategy. We operate a top-down governance structure with executive and Group Management Committee (GMC) members sitting across ESG and corporate responsibility committees. Our Global Head of Sustainable Investment is also a member of the GMC. Members of the GMC have specific objectives relating to sustainability, with a proportion of their variable remuneration dependent on progress against these objectives. We have clear and effective governance structures in place for decision-making and oversight of our ESG Policy and strategy. The Board of Schroders plc (the Board) has collective responsibility for the management, direction and performance of the Group, and is accountable for our business strategy.

Questions	Schroders Investment Management Limited		
	<p>governance principles and what we expect of our investee companies in this regard.</p> <p>Our policy should be viewed alongside our Climate Transition Action Plan (https://prod.schroders.com/en/sysglobalassets/digital/global/corporate-responsibility/climate-transition-action-plan.pdf), which lays out our firm-wide climate commitments, and our Engagement Blueprint (https://prod.schroders.com/en/sysglobalassets/about-us/schroders-engagement-blueprint-2022.pdf), which explains our principles around active ownership.</p>		<p>The Group has a well-defined governance framework based on delegated authority. The Board has reserved certain matters to itself and has also delegated specific responsibilities to Board committees, notably the Nominations Committee, the Audit and Risk Committee and the Remuneration Committee and to the Group Chief Executive. The Group Chief Executive is responsible for proposing the strategy for the Group and for its execution.</p> <p>For a number of years, our executive Directors have had sustainability-related metrics included within their annual bonus scorecard. The specific targets and measures are chosen each year to align to our key priorities.</p> <p>Below the Board and GMC, there are three main sustainability governance committees:</p> <p>The Corporate Responsibility Committee (CR Committee) provides advice to the Group Chief Executive to assist him in discharging his responsibilities regarding corporate responsibility. The Committee considers, reviews and recommends the overall global corporate responsibility strategy, including key initiatives, new commitments and policies to the Group Chief Executive for approval. The Head of Corporate Sustainability, a member of the Committee, reports annually to the GMC and the Board.</p> <p>The ESG Executive Committee (ESG ExCo) considers the Group's sustainability strategy and advises the Global Head of Investment on the Investment Management sustainability strategy and how we aim to achieve our net zero asset management business model. Any updates to our ESG policy are approved by the ESG ExCo and Global Head of Investment.</p> <p>The ESG Regulatory Steering Committee (ESG Reg SteerCo) monitors emergent ESG regulations and determines their high-level impact on our ESG strategy and supporting operations. The committee receives input on forthcoming sustainability-related regulation from our in-house Public Policy team, which actively engages with relevant regulators, industry trade associations and other climate initiative bodies, in addition to our in-house ongoing monitoring of the regulatory horizon, including climate regulations.</p>
Do you have a firm ESG rating?	Schroders plc's overall ESG rating from Sustainalytics is 19, from Refinitiv is 76 and from MSCI is AAA (Source: Sustainalytics, Refinitiv and MSCI, as at February 2023.)	Do you have a dedicated team that considers ESG and Climate Change related factors?	<p>Yes</p> <p>Sustainability is fundamental to our investment principles at Schroders and we have an experienced and well-resourced Sustainable Investment team, who are embedded within our Investment function. As at January 2023, the team comprises over 50+ dedicated ESG professionals with over 400 years' combined investment experience. We are a global team, spread across four regional hubs in London, Paris, Singapore and New York, aiming to ensure that sustainability is embedded through our global investment teams and client functions.</p> <p>The team is led by Andrew Howard, Global Head of Sustainable Investment who is also a member of our Group Management Committee. As team head, he oversees our approach to ESG integration, active ownership, our sustainability research and tools, and our reporting and product strategy.</p> <p>Our Sustainable Investment team sits alongside investment teams rather than operating in a silo, which facilitates regular dialogue with our analysts and portfolio managers. It is organised into three pillars: 1) Sustainable Investment Management, incorporating integration, thematic research and models and data, 2) Active Ownership, encompassing engagement and voting and 3) Product, which entails our client, product and solutions activities. We also have regional sustainability specialists in Europe, Asia and North America, who work closely</p>

Questions	Schroders Investment Management Limited		
			<p>with our regional investment desks and clients globally. We outline their key responsibilities and areas of focus below.</p> <ol style="list-style-type: none"> 1. Sustainable investment management Our Integration team works with our investment teams to integrate our proprietary ESG tools and research into their investment processes. They are also responsible for the annual review and integration accreditation of all our investment desks. Our Research team is responsible for conducting research into our key thematic areas and working in collaboration with investors to help them understand how these themes impact their portfolios. Our Models and Data team is responsible for the maintenance and evolution of our suite of proprietary tools. They are also responsible for ESG data, ensuring we harness sustainability data effectively from both conventional and unconventional sources. 2. Active ownership Our Engagement team partners with investors to have dialogue with the companies in which we invest, seeking to understand how prepared they are for a changing world and pushing them towards more sustainable practices. The team track the progress of these engagements and hold companies to account. Our Corporate Governance team is responsible for voting in line with our Voting Policy and Principles. 3. Product Our Product team is responsible for all the externally-facing aspects of our sustainability strategy. This includes our suite of products and solutions, client engagement and our engagement with regulators and industry bodies. We also have regional specialists who help our clients around the globe to achieve their sustainability objectives.
Please provide your UNPRI survey scores	<p>We became a signatory to the UNPRI on 29 October 2007, however we have been considering ESG and sustainable investment since 2000. After a delay in the UNPRI reporting cycle, we have now received our 2021 scores, reflecting our activity during 2020.</p> <p>The 2021 reporting cycle introduced a new reporting and assessment framework. We have received scores of 4 and 5 stars across all of the modules in the new reporting structure; which ranges from 1-5 stars (5 being the top score).</p> <p>A summary of our scores for the 2021 reporting cycle are available below. Our public transparency report is also available here: https://ctp.unpri.org/dataportalv2/transparency.</p> <p>Module</p> <p>Investment & Stewardship Policy: Rating 4 stars</p> <p>Direct – Listed Equity (Active quantitative – incorporation): Rating 5 stars</p> <p>Direct – Listed Equity (Active fundamental – incorporation): Rating 5 stars</p> <p>Direct – Listed Equity (Investment trusts – incorporation): Rating 5 stars</p> <p>Direct – Listed Equity (Active quantitative – voting): Rating 5 stars</p> <p>Direct – Listed Equity (Active fundamental – voting): Rating 5 stars</p> <p>Direct – Listed Equity (Investment trusts – voting): Rating 5 stars</p> <p>Direct – Fixed Income – SSA: Rating 5 stars</p> <p>Direct – Fixed Income – Corporate: Rating 5 stars</p> <p>Direct – Fixed Income – Securitised: Rating 5 stars</p> <p>Direct – Real Estate: Rating 4 stars</p> <p>Indirect – Listed Equity – Passive: Rating 4 stars</p> <p>Indirect – Listed Equity – Active: Rating 4 stars</p>	Do you rely on any third parties to provide ESG and Climate Change related analysis/research?	<p>Yes</p> <p>We use information from several external ESG research firms, but only ever as one input into our own company assessments to be questioned, examined and built on. Third party research may be used by the Sustainable Investment team, however our analysts form a proprietary view on each of the companies we analyse.</p> <p>We currently subscribe to the following external ESG research providers: MSCI ESG research, Bloomberg, EIRIS, Refinitiv and Sustainalytics. In addition, we subscribe to Institutional Shareholder Services and the Investment Association's Institutional Voting Information Service for our proxy voting research.</p> <p>Aiming to move away from the use of third party ESG scores, we developed CONTEXT. The tool goes beyond a simple tick box approach – it is interactive and customisable, enabling analysts to select the most material ESG factors for each sector, weight their importance and apply relevant metrics. Analysts are then able to compare companies based on the metrics selected, their own company assessment scores or adjusted rankings (by size, sector or region). The unique features of the tool give analysts the flexibility to make company specific adjustments to reflect their specialist knowledge.</p>

Questions	Schroders Investment Management Limited		
	Indirect – Fixed Income – Passive: Rating 4 stars Indirect – Fixed Income – Active: Rating 4 stars Indirect – Private Equity: Rating 5 stars		
Do you have a Climate Change policy that is integrated into the investment process?	<p>Yes</p> <p>We believe it is important to hold ourself to the same high standards we set for our investee companies and our Climate Transition Action Plan (CTAP) outlines how we will manage our business toward net zero emissions across both our own operations and value chain. The latter makes up the majority of our emissions and relates primarily to the investments we make on behalf of our clients. We will deliver that transition to protect and create value for our clients.</p>	Do you create your own ESG or Climate Change related scores	<p>Yes</p> <p>At Schroders we do not take a “one size fits all” approach to ESG integration. We understand that different asset classes require different methods to integrate ESG into their investment processes effectively. We have therefore developed a suite of research-based and quantitative ESG investment tools which provide insights to empower our investors to make decisions. We have outlined our key tools below:</p> <p>SustainEx™ SustainEx™ provides our investment teams with an estimate of positive and negative “externalities” that companies and countries may create for society. It does this by using metrics chosen by Schroders and quantifying positive (for example, paying ‘fair wages’) and negative (for example, the level of carbon an issuer emits) metrics to produce an aggregate measure, expressed as a notional percentage of sales (of a company) or GDP (of a country). If a company was handed a bill or a credit note at the end of the year, for the net costs or benefits they created for society, SustainEx™ estimates what that would be.</p> <p>Like companies, we believe that sovereigns may also be assessed in terms of the externalities they may create for society. SustainEx™ estimates global costs and benefits arising from government activities – such as spending on education and infrastructure, predatory taxation, treatment of refugees and biodiversity loss – and how countries may contribute positively or negatively to these. In respect of sovereigns, SustainEx™ uses 29 metrics and covers 150 countries (as at June 2022). The net score of each such country – or its “social value” – is normalised as a percentage of GDP so we can compare country scores in our investment analysis.</p> <p>CONTEXT™ Our flagship ESG research tool, provides a systematic framework for analysing a company’s relationship with its stakeholders and the sustainability of its business model. Comprising over 260 metrics across over 13,000 companies, it is designed to support our investors’ understanding of the sustainability of companies’ business models and profitability, and provides structured, logical and wide-ranging data to support our analysts’ views. This consistent structure makes information sharing easier and allows us to identify market wide trends and insights.</p> <p>The tool goes beyond a simple tick box approach – it is interactive and customisable, enabling analysts to select the most material ESG factors for each sector, weight their importance and apply relevant metrics. Analysts are then able to compare companies based on the metrics selected, their own company assessment scores or adjusted rankings (size, sector or region), with the flexibility to make company specific adjustments to reflect their detailed knowledge. The tool is fully integrated within Schroders’ global research platform, which is readily accessible across investment desks and geographies.</p> <p>We have also developed a number of proprietary quantitative metrics that can be used to demonstrate and measure a portfolio’s sustainability characteristics.</p> <p>Country CONTEXT™ We recognise that the importance of ESG risks to nations is likely to increase as social and environmental challenges, such as social unrest or climate change – intensify and the world becomes increasingly connected. While many investors</p>

Questions	Schroders Investment Management Limited		
			<p>consider country risk when allocating capital, there have been few attempts to date that consider the long-term sustainability of countries' growth and whether risks or opportunities are reflected in asset valuations.</p> <p>Country CONTEXT™ aims to provide a structured lens through which to analyse the sustainability of sovereign GDP growth. By assessing the ESG risks and opportunities that have historically driven growth, as well as those that may be influential in the future, it aims to provide investors with a long-term view of countries' GDP growth as well as an indication as to whether the market is pricing in country sustainability factors across various asset classes.</p> <p>We also have a suite of climate tools, recognising that this complex challenge is multi-faceted and we need multiple lenses to build an understand of climate risk across our investments.</p> <p>Carbon value at risk (VaR) Carbon footprints remain the dominant measure of carbon exposure, but are an incomplete and sometimes misleading measure of investment risk. We have developed a way of looking at carbon risk, whereby we focus on the ways value will be lost or created as policies strengthen, through financial analysis rather than environmental research. Our carbon value at risk (VaR) model assesses the effect of a significant rise in carbon prices on a company's cost structure, industry prices, volumes and cash flows.</p> <p>Climate Progress Dashboard The dashboard monitors change indicators across the four categories that we consider have the most influence on limiting global temperature rises: political change, business and finance, technology solutions and entrenched industry (i.e. fossil fuel use). It provides us and our clients with an objective, transparent and comprehensive view of the pace and scale of global climate action (https://www.schroders.com/en/sustainability/corporate-responsibility/sustainability/climate-progress-dashboard)</p> <p>Net Zero Dashboard This recently, developed tool enables our investment teams and central risk function to monitor the temperature alignment of portfolios. This an important component of meeting our net zero targets. For more information please see our Climate Transition Action Plan: https://www.schroders.com/en/sysglobalassets/digital/global/corporate-responsibility/climate-transition-action-plan.pdf</p> <p>Physical risk model Our physical risk framework – which we have applied to over 10,000 companies globally – estimates what businesses would have to pay to insure their physical assets against hazards caused by rising global temperatures and weather disruption. Comparing that implied cost to companies' market values provides a systematic way to help measure, monitor and manage the risks companies face.</p>
Does your company have a policy on equality and diversity in the workplace?	<p>Yes</p> <p>Schroders is committed to providing equal opportunities in employment and to preventing discrimination. Our Equal Opportunities, Bullying, Harassment, Respect and Dignity at Work policy is intended to assist Schroders to put this commitment into practice. Compliance with this policy will ensure that employees do not commit unlawful acts of discrimination and treat one another with dignity and respect.</p> <p>The policy applies to all employees regardless of their seniority together with applicants, consultants and contractors working for us and other</p>	Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?	<p>Yes</p> <p>At Schroders, we believe that clear and ongoing communication to clients and other stakeholders on our ESG and stewardship activities is important. Over the past few years, we have been working to increase the transparency and usefulness of our reporting.</p> <p>Through the publication of our annual and quarterly Sustainable Investment reports, we demonstrate our engagement activity and progress. We share our research and thought leadership, and provide insights into innovations aimed at maintaining our status as a market leader. We also publicly disclose our global</p>

Questions	Schroders Investment Management Limited		
	<p>individuals such as external suppliers, not directly employed by us but with whom we have dealings during the course of our business.</p> <p>More information is available here: https://www.schroders.com/en/about-us/people-and-culture/inclusion/</p>		<p>voting activity. More in depth reporting on engagement and voting is supplied to clients.</p> <p>We have a dedicated Sustainability webpage (https://www.schroders.com/en/sustainability/active-ownership/) which contains a number of reporting including the following:</p> <ul style="list-style-type: none"> – Quarterly Sustainable Investment Report (https://www.schroders.com/en/sustainability/active-ownership/sustainability-analysis-in-practice/) – Current ESG related topics and thematic research, engagements details, voting details. – Annual Sustainable Investment Report (https://www.schroders.com/en/sustainability/active-ownership/sustainability-analysis-in-practice/) – Our approach to ESG Integration, policy details, current ESG related topics and thematic research, engagements details, voting and governance details, general statistics and AUMs, details of industry involvement . – Sustainability insights (https://www.schroders.com/en/insights/topic-landing-page/?categoryId=499) on a range of environmental, social and governance factors. – Historical voting reports (https://www.schroders.com/en/sustainability/active-ownership/voting/). – Engagement Blueprint (https://www.schroders.com/en/sysglobalassets/about-us/schroders-engagement-blueprint-2022-1.pdf). – Climate Transition Action Plan (https://www.schroders.com/en/sysglobalassets/digital/global/corporate-responsibility/climate-transition-action-plan.pdf).
Do ESG related factors get considered with respect to performance management of investment companies and funds?	<p>Yes</p> <p>Schroders has integrated the assessment of sustainability factors and risk across our managed assets*. This means that when we assess the performance of our investment teams we do so having regard to investment performance that is in part derived from ESG-integrated investment processes. ESG integration, coupled with investment performance measured over at least a five-year period, means that the consideration and management of sustainability factors and risks are a component of our remuneration decisions for our investment teams.</p> <p>Schroders has a proud history of investing sustainably. Our long-term approach leads us to the belief that generating returns for our clients will be intrinsically linked to our ability to identify, measure and engage on the impacts of social and environmental change attributable to the assets in which we invest.</p> <p>In our experience successful investment is intrinsically linked to identifying, understanding and incorporating the effects of ESG trends in our idea generation, analysis, portfolio construction and ownership. While ESG issues are sometimes difficult to quantify, these factors can have a material impact on an investment's performance both in the short and long term, as well as the inherent risk of investing in that asset. Therefore we firmly believe analysing a company's exposure to, and management of, ESG factors, in addition to traditional financial analysis, will enhance our understanding of an investment's fair value and ability to deliver sustainable returns.</p> <p>Active Ownership is an important part of our sustainability strategy. Through active ownership, we aim to drive change that will protect and enhance the value of our investments and we are committed to leveraging the weight of our firm to change how a company is operating</p>	Are you signatories of the FRC UK Stewardship Code or equivalent?	<p>Yes</p> <p>Schroders fully supports the UK Stewardship Code and complies with all its principles. Although the Code is focused on the UK, it is a globally recognised standard and signatories must report on their active ownership activities across their entire asset base. Hence, in our report we outline how we apply the Stewardship Code principles globally, taking into account local practice and law. We are mindful of similar stewardship codes in other jurisdictions in which we invest. We keep these under review and look to our statement of compliance with the UK Stewardship Code to be our response to them.</p> <p>Our 2021 Stewardship Code report explaining how we apply the Code's principles in practice can be found at https://www.frc.org.uk/getattachment/c40289db-0361-4a21-8061-f5eb40e90611/NEW-Schroders-Stewardship-Code-Report-rev-2021.pdf</p>

Fund Manager Business Response

Questions	Schroders Investment Management Limited		
	<p>for the better. We believe this is an important aspect of our role as stewards of our clients' capital and how we help clients meet their long-term financial goals in line with our fiduciary responsibilities.</p> <p>*For certain businesses acquired during the course of 2020, 2021 and 2022 we have not yet integrated ESG factors into investment decision-making. There are also a small number of strategies for which ESG integration is not practicable or now possible, for example passive index tracking or legacy businesses or investments in the process of or soon to be liquidated, and certain joint venture businesses are excluded.</p>		

Fund Manager Product Response

Activity	CT LDI Equity-linked Real Dynamic LDI Sub-Fund		
How many engagements have you had with companies in the past 12 months?		Do you conduct your own votes?	Not applicable for this fund
How many engagements were made regarding climate change?		Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	Not applicable for this fund
How many engagements were made regarding board diversity?		How many votes were proposed across the underlying companies in the fund?	
How many engagements were made regarding waste reduction?		How many times did you vote in favour of management?	
How many engagements were made regarding financials?		How many times did you vote against management?	
How many engagements were made regarding other issues?		How many votes did you abstain from?	
Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> • Sending standardised letters to companies • Sending bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues 		Please discuss some of the key votes and outcomes from the last 12 months.	Not applicable for this fund
Please discuss some of the key engagements and outcomes from the last 12 months.	<p>Barclays PLC At the Q3 investor update, the company announced that it was accelerating its timeline to phase out the financing of thermal coal power in the US from 2035 to 2030, in line with its approach in the UK and EU. The decision was taken as a result of engagement with shareholders and the introduction of the Inflation Reduction Act in the US.</p> <p>HSBC Holdings PLC HSBC has updated its energy policy to include the ending of funding for new oil and gas projects. In particular it states: HSBC will not provide new finance, or new advisory services, to any client for the specific purposes of O&G exploration, appraisal, development, and production pertaining to: <ul style="list-style-type: none"> • ultra-deepwater offshore O&G projects; • shale oil projects; extra heavy oil projects; • projects in environmentally and socially critical areas; • infrastructure whose primary use is in conjunction with the above activities. </p>	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Not Provided
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	

Fund Manager Product Response

Activity	Insight LDI Enhanced Selection Shorter Real Fund		
How many engagements have you had with companies in the past 12 months?	31	Do you conduct your own votes?	Not applicable for this fund
How many engagements were made regarding climate change?		Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	Not applicable for this fund
How many engagements were made regarding board diversity?		How many votes were proposed across the underlying companies in the fund?	
How many engagements were made regarding waste reduction?		How many times did you vote in favour of management?	
How many engagements were made regarding financials?		How many times did you vote against management?	
How many engagements were made regarding other issues?		How many votes did you abstain from?	
Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> • Sending standardised letters to companies • Sending bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues 		Please discuss some of the key votes and outcomes from the last 12 months.	Not applicable for this fund
Please discuss some of the key engagements and outcomes from the last 12 months.	<p>UK DMO - Q2 2022 Insight engages regularly with the Debt Management Office (DMO) given Insight's large client base of UK pension schemes, who invest heavily in UK government bonds (gilts). Prime sovereign ESG risk rating: 2.</p> <p>Insight engaged with the DMO to raise several issues related to green gilt issuance and other sustainability topics, including the following. We encouraged the DMO to increase the frequency of impact reporting on green gilts from every two years to once a year. Their response made clear this is unlikely in the near term. We explained the requirement for UK pension funds to report in line with TCFD recommendations. Gilts attract a high figure for associated emissions, and we highlighted the risk of investors turning away from gilts as a result, with the caveat that we are not observing such behaviour and stakeholders are working extensively on the articulation of mandate objectives to avoid poor investment decision-making. We highlighted that more relevant data on emissions from the government may help. We explained that uncertainty over institutional investors'</p>	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	

Activity	Insight LDI Enhanced Selection Shorter Real Fund		
	<p>fiduciary duty presented challenges for allocations to green gilts. The DMO said it was aware of this before the issuance of green gilts, but given the success of the issuance they did not view this uncertainty as a problem. We reiterated that it remained a problem, with strong views being expressed in the market. We explained that it would be helpful if the government could clarify how trustees' fiduciary duties apply to increase comfort in allocating to green and other impact bonds.</p> <p>We asked about the DMO's intentions regarding sustainability-linked bonds. They set out obstacles, and given the focus on liquidity, we expect green gilts to remain the focus for the time being</p> <p>Insight will continue its ongoing engagement with the DMO on a wide range of issues, and will keep engaging on relevant ESG topics</p>		
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	

Activity	CT LDI Equity-linked Nominal Dynamic LDI Sub-Fund		
How many engagements have you had with companies in the past 12 months?		Do you conduct your own votes?	Not applicable for this fund
How many engagements were made regarding climate change?		<p>Do you use a third party to vote on your behalf?</p> <p>If Yes, please provide the details of your provider and any comments</p>	Not applicable for this fund
How many engagements were made regarding board diversity?		How many votes were proposed across the underlying companies in the fund?	
How many engagements were made regarding waste reduction?		How many times did you vote in favour of management?	
How many engagements were made regarding financials?		How many times did you vote against management?	
How many engagements were made regarding other issues?		How many votes did you abstain from?	
<p>Which form of engagement is most representative of the approach taken for this fund over the last 12 months:</p> <ul style="list-style-type: none"> • Sending standardised letters to companies • Sending bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues 		Please discuss some of the key votes and outcomes from the last 12 months.	Not applicable for this fund

Fund Manager Product Response

Activity	CT LDI Equity-linked Nominal Dynamic LDI Sub-Fund		
Please discuss some of the key engagements and outcomes from the last 12 months.	<p>Barclays PLC At the Q3 investor update, the company announced that it was accelerating its timeline to phase out the financing of thermal coal power in the US from 2035 to 2030, in line with its approach in the UK and EU. The decision was taken as a result of engagement with shareholders and the introduction of the Inflation Reduction Act in the US.</p> <p>HSBC Holdings PLC HSBC has updated its energy policy to include the ending of funding for new oil and gas projects. In particular it states: HSBC will not provide new finance, or new advisory services, to any client for the specific purposes of O&G exploration, appraisal, development, and production pertaining to:</p> <ul style="list-style-type: none"> • ultra-deepwater offshore O&G projects; • shale oil projects; extra heavy oil projects; • projects in environmentally and socially critical areas; • infrastructure whose primary use is in conjunction with the above activities. 	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Not Provided
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	

Activity	JPM Unconstrained Bond Fund		
How many engagements have you had with companies in the past 12 months?	300	Do you conduct your own votes?	Not applicable for this fund
How many engagements were made regarding climate change?		Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	Not applicable for this fund
How many engagements were made regarding board diversity?		How many votes were proposed across the underlying companies in the fund?	
How many engagements were made regarding waste reduction?		How many times did you vote in favour of management?	
How many engagements were made regarding financials?		How many times did you vote against management?	
How many engagements were made regarding other issues?		How many votes did you abstain from?	

Fund Manager Product Response

Activity	JPM Unconstrained Bond Fund		
Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> Sending standardised letters to companies Sending bespoke letters to companies Standard period engagement with companies Active private engagement on specific issues Active public engagement on specific issues 	Sending bespoke letters to companies,Active private engagement on specific issues,Standard period engagement with companies	Please discuss some of the key votes and outcomes from the last 12 months.	
Please discuss some of the key engagements and outcomes from the last 12 months.		Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Yes
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	51

Activity	Apollo Total Return Fund		
How many engagements have you had with companies in the past 12 months?	54	Do you conduct your own votes?	
How many engagements were made regarding climate change?		Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	
How many engagements were made regarding board diversity?		How many votes were proposed across the underlying companies in the fund?	
How many engagements were made regarding waste reduction?		How many times did you vote in favour of management?	
How many engagements were made regarding financials?		How many times did you vote against management?	
How many engagements were made regarding other issues?		How many votes did you abstain from?	
Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> Sending standardised letters to companies Sending bespoke letters to companies Standard period engagement with companies Active private engagement on specific issues Active public engagement on specific issues 	Standard period engagement with companies	Please discuss some of the key votes and outcomes from the last 12 months.	
Please discuss some of the key engagements and outcomes from the last 12 months.	Environmental - 47 Social - 33 Governance - 25 Moss Creek is an independent oil and gas company focused on exploration. The company has a high ESG Credit Risk Rating of 3.05 which falls in the bottom half of the high ESG risk	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Yes

Activity	Apollo Total Return Fund		
	category. We assess the company's environmental risk as high given the inherent GHG and pollution risks associated with the company's oil and gas exploration and production operations. Moss also faces elevated governance risks. It is ultimately owned and controlled by a Chinese entity called Shandong Xinchao that is listed on the Shanghai Stock Exchange. The Company's credit agreements and indentures allow for equity distributions to the parent entity. In November 2022, we engaged with Moss Creek to understand how it is mitigating these risks. To mitigate its environmental impact, Moss Creek shared with us that the company has prioritized reducing emissions in its operations, primarily by reducing flaring and through the build out of an extensive water infrastructure and recycling system (which reduces the need for thousands of miles of truck driving and for freshwater extraction). Moss Creek's US assets are ringfenced from the parent entity, mitigating governance risks. Management has taken strides to improve its governance structure (most notably via the creation of a Corporate Responsibility Team and the engagement of a third-party consultant to gather stakeholder feedback).		
What is the target turnover rate for the portfolio?	40	What was the actual turnover rate over the last 12 months?	27

Activity	M&G Total Return Credit Investment Fund		
How many engagements have you had with companies in the past 12 months?	11	Do you conduct your own votes?	N/A
How many engagements were made regarding climate change?	5	Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	N/A
How many engagements were made regarding board diversity?	1	How many votes were proposed across the underlying companies in the fund?	
How many engagements were made regarding waste reduction?		How many times did you vote in favour of management?	
How many engagements were made regarding financials?		How many times did you vote against management?	
How many engagements were made regarding other issues?	5	How many votes did you abstain from?	

Activity	M&G Total Return Credit Investment Fund		
<p>Which form of engagement is most representative of the approach taken for this fund over the last 12 months:</p> <ul style="list-style-type: none"> • Sending standardised letters to companies • Sending bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues 	Active private engagement on specific issues	Please discuss some of the key votes and outcomes from the last 12 months.	N/A
Please discuss some of the key engagements and outcomes from the last 12 months.	<p>Engagement with MARKS AND SPENCER PLC: Objective: To explore the potential of M&S, British multinational retailer, becoming Real Living Wage accredited. Action Taken: M&G sent a letter to the company to make our expectations known. Engagement result: Their aim is to maintain pay levels for all M&S colleagues which are competitive in the relevant market. For frontline colleagues in stores, their national and London rates are above the real living wage. As they pay above the Living Wage to their own employees, there is no additional cost of doing so, or impact on pay differentials. Currently their position is that they are not seeking accreditation as a Living Wage Employer. This is because they prefer to set rates independently and do not wish to impose pay arrangements on third-party contractors. The main complexity here would be amending contracts with third-party suppliers. They are, however, committed to paying colleagues fairly and take a range of external factors into consideration when setting our hourly rates, including the real Living Wage rates. They also consider internal factors, such as business performance and the wider reward package, which includes a generous pension and a discount on M&S products. M&S also have one of the lowest turnover rates in the retail sector and colleagues who stay with the business for many years. They informed us that they work hard to stay engaged with all employees, including a Reward and Wellbeing Survey for last year which provided rich information about what really matters to them. M&G noted the concerns that the company had in regard to becoming accredited, and were happy with the overall work that the company was doing to ensure that employees are fairly paid.</p> <p>Engagement with THERMO FISHER: Objective: To ensure that US medical technology and analytical equipment business Thermo Fisher Scientific had effective policies and procedures in place to help avoid the misuse of its equipment. By way of background, following public reports regarding human rights violations against the Uyghur people in China's Xinjiang region, coupled with speculation that Thermo Fisher's STR (Short Tandem Repeat) DNA products were being potentially used in a manner inconsistent with human rights principles, the company ceased any new sales of human identification (HID) products to Xinjiang Public Security Bureaus in March of 2019. This equipment is usually used in, for example, forensics - to match DNA to an established database - and cannot, in and of itself, be used to identify or profile ethnic minority populations. Action: M&G met with the company's investor relations and the senior director of corporate social responsibility to discuss the issue. Outcome: We were satisfied that Thermo Fisher had taken the issue seriously, and responded by improving its policies</p>	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	As an asset manager we use a range of information, including portfolio alignment data and scenario modelling, to identify exposure to climate risk across our clients' portfolios. We have a range of tools used to identify and assess risks including our Portfolio Analytics Tool (PAT) and Coal Tool, which provide a quantitative assessment of investees' exposure to climate risks and opportunities. Our portfolio analytics tool (PAT), which incorporates NZIF metrics, allows our investment teams to monitor and visualise climate data and enables them to track progress against relevant benchmarks. In 2022, the PAT was updated to reflect the latest climate science and bring the NZIF in line with relevant IIGCC guidelines.

Fund Manager Product Response

Activity	M&G Total Return Credit Investment Fund		
	and procedures. It has adopted and implemented a Code of Business Conduct and Ethics, applicable to all directors, officers, and employees, who receive annual training on the code. In order to help ensure that no products or services are sold that could potentially be used in unintended ways to violate human rights, the company implemented a multi-level purchasing process designed to prevent the ordering and resale of HID products to public security bureaus in the region (and has produced a broader list of countries it will not sell to, based on country risk assessment). The company has an approved network of authorised distributors that agree to comply with this purchasing process under the terms of their contract. Thermo Fisher also has in place a cross-functional Bioethics Committee, consisting of the Chief Operating Officer, the Chief Science Officer, and leaders representing its life sciences and diagnostics businesses and legal and communications functions. The Bioethics Committee regularly assesses the ethical and social implications of scientific developments in biotechnology, and has regularly reviewed Thermo Fisher's existing policies and provided updates to the company's Science and Technology Committee of its board of directors. We will further engage with the company on matters of bioethics in due course.		
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	

Activity	Partners Group Generations Fund		
How many engagements have you had with companies in the past 12 months?		Do you conduct your own votes?	As a private markets firm, we have very limited exposure to voting activity. Partners Group uses a proxy advisor for its limited listed investments, working with one of the major proxy advising companies in the world - Glass Lewis. Glass Lewis does in-depth research on each ballot item and recommends voting in line with the list of guidelines best practice and considering local market standards. Glass Lewis also votes primarily according to Partners Group's Proxy Voting Policy.
How many engagements were made regarding climate change?		Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	Yes Glass Lewis Partners Group uses a proxy advisor for its limited listed investments, working with one of the major proxy advising companies in the world - Glass Lewis. Glass Lewis does in-depth research on each ballot item and recommends voting in line with the list of guidelines best practice and considering local market standards. Glass Lewis also votes primarily according to Partners Group's Proxy Voting Policy.
How many engagements were made regarding board diversity?		How many votes were proposed across the underlying companies in the fund?	959

Fund Manager Product Response

Activity	Partners Group Generations Fund		
How many engagements were made regarding waste reduction?		How many times did you vote in favour of management?	915
How many engagements were made regarding financials?		How many times did you vote against management?	22
How many engagements were made regarding other issues?		How many votes did you abstain from?	15
Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> Sending standardised letters to companies Sending bespoke letters to companies Standard period engagement with companies Active private engagement on specific issues Active public engagement on specific issues 	Active private engagement on specific issues, Standard period engagement with companies	Please discuss some of the key votes and outcomes from the last 12 months.	While we track our limited voting activity and ensure it falls in line with our approach to ESG & Sustainability, we do not see it as key engagements.
Please discuss some of the key engagements and outcomes from the last 12 months.	As a private markets firm, we hold controlling stakes in our investment companies. Consequently, our engagement is of an ongoing nature and we do not track individual exchanges.	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Yes, for the direct investments in the strategy we collect carbon data on a best effort basis.
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	9.1

Activity	Insight LDI Enhanced Selection Longer Real Fund		
How many engagements have you had with companies in the past 12 months?	31	Do you conduct your own votes?	Not applicable for this fund
How many engagements were made regarding climate change?		Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	Not applicable for this fund
How many engagements were made regarding board diversity?		How many votes were proposed across the underlying companies in the fund?	
How many engagements were made regarding waste reduction?		How many times did you vote in favour of management?	
How many engagements were made regarding financials?		How many times did you vote against management?	
How many engagements were made regarding other issues?		How many votes did you abstain from?	

Fund Manager Product Response

Insight LDI Enhanced Selection Longer Real Fund			
Activity			
Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> Sending standardised letters to companies Sending bespoke letters to companies Standard period engagement with companies Active private engagement on specific issues Active public engagement on specific issues 		Please discuss some of the key votes and outcomes from the last 12 months.	Not applicable for this fund
Please discuss some of the key engagements and outcomes from the last 12 months.	<p>UK DMO - Q2 2022</p> <p>Insight engages regularly with the Debt Management Office (DMO) given Insight's large client base of UK pension schemes, who invest heavily in UK government bonds (gilts).</p> <p>Prime sovereign ESG risk rating: 2.</p> <p>Insight engaged with the DMO to raise several issues related to green gilt issuance and other sustainability topics, including the following.</p> <p>We encouraged the DMO to increase the frequency of impact reporting on green gilts from every two years to once a year. Their response made clear this is unlikely in the near term. We explained the requirement for UK pension funds to report in line with TCFD recommendations. Gilts attract a high figure for associated emissions, and we highlighted the risk of investors turning away from gilts as a result, with the caveat that we are not observing such behaviour and stakeholders are working extensively on the articulation of mandate objectives to avoid poor investment decision-making. We highlighted that more relevant data on emissions from the government may help.</p> <p>We explained that uncertainty over institutional investors' fiduciary duty presented challenges for allocations to green gilts. The DMO said it was aware of this before the issuance of green gilts, but given the success of the issuance they did not view this uncertainty as a problem. We reiterated that it remained a problem, with strong views being expressed in the market. We explained that it would be helpful if the government could clarify how trustees' fiduciary duties apply to increase comfort in allocating to green and other impact bonds.</p> <p>We asked about the DMO's intentions regarding sustainability-linked bonds. They set out obstacles, and given the focus on liquidity, we expect green gilts to remain the focus for the time being.</p> <p>Insight will continue its ongoing engagement with the DMO on a wide range of issues, and will keep engaging on relevant ESG topics</p>	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	

Activity	Schroder Life Intermediated Diversified Growth Fund
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Fund Manager Product Response

Activity	Schroder Life Intermediated Diversified Growth Fund		
How many engagements have you had with companies in the past 12 months?	1193	Do you conduct your own votes?	As active owners, we recognise our responsibility to make considered use of voting rights. We therefore vote on all resolutions at all AGMs/EGMs globally unless we are restricted from doing so (e.g. as a result of share blocking).
How many engagements were made regarding climate change?	611	Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	yes Institutional Shareholder Services (ISS) Institutional Shareholder Services (ISS) act as our one service provider for the processing of all proxy votes in all markets. ISS delivers vote processing through its Internet-based platform Proxy Exchange. Schroders receives recommendations from ISS in line with our own bespoke guidelines, in addition, we receive ISS's Benchmark research. This is complemented with analysis by our in house ESG specialists and where appropriate with reference to financial analysts and portfolio managers. Voted For
How many engagements were made regarding board diversity?	272	How many votes were proposed across the underlying companies in the fund?	5374
How many engagements were made regarding waste reduction?	54	How many times did you vote in favour of management?	4555
How many engagements were made regarding financials?	272	How many times did you vote against management?	481
How many engagements were made regarding other issues?		How many votes did you abstain from?	47
Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> • Sending standardised letters to companies • Sending bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues 		Please discuss some of the key votes and outcomes from the last 12 months.	Mastercard Incorporated 21/6/23 Report on Risks Associated with Sale and Purchase of Ghost Guns We believe shareholders would benefit from additional information on if and how the company intends to reduce the risks associated with the use of its payment systems for the sale and purchase of "ghost guns." Outcome: Fail
Please discuss some of the key engagements and outcomes from the last 12 months.		Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	15.97

Activity	CT Sterling Liquidity Fund		
How many engagements have you had with companies in the past 12 months?		Do you conduct your own votes?	Not applicable for this fund

Fund Manager Product Response

Activity	CT Sterling Liquidity Fund		
How many engagements were made regarding climate change?		Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	Not applicable for this fund Not applicable for this fund Not applicable for this fund
How many engagements were made regarding board diversity?		How many votes were proposed across the underlying companies in the fund?	
How many engagements were made regarding waste reduction?		How many times did you vote in favour of management?	
How many engagements were made regarding financials?		How many times did you vote against management?	
How many engagements were made regarding other issues?		How many votes did you abstain from?	
Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> • Sending standardised letters to companies • Sending bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues 		Please discuss some of the key votes and outcomes from the last 12 months.	N/A
Please discuss some of the key engagements and outcomes from the last 12 months.	Barclays PLC At the Q3 investor update, the company announced that it was accelerating its timeline to phase out the financing of thermal coal power in the US from 2035 to 2030, in line with its approach in the UK and EU. The decision was taken as a result of engagement with shareholders and the introduction of the Inflation Reduction Act in the US. HSBC Holdings PLC HSBC has updated its energy policy to include the ending of funding for new oil and gas projects. In particular it states: HSBC will not provide new finance, or new advisory services, to any client for the specific purposes of O&G exploration, appraisal, development, and production pertaining to: • ultra-deepwater offshore O&G projects; • shale oil projects; extra heavy oil projects; • projects in environmentally and socially critical areas; • infrastructure whose primary use is in conjunction with the above activities.	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Yes
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	

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