

Implementation Statement



Hayes & Finch Limited Pension Scheme

5 April 2023

isio.

Document classification: Public

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 Hayes and Finch Limited 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 July 2021.

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 5 April 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

Over the reporting year, the Trustee did not make any changes to the Scheme's investment strategy. However, the Scheme's SIP was updated post year end to account for new DWP regulations and the Trustee is expecting to review the Scheme's investment strategy immediately following completion of the actuarial valuation of the Scheme as at 5 April 2022.

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 agreed 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 cash flows.	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 agreed investment strategy.
Covenant	The risk that the sponsoring company becomes unable to continue providing the required financial support to the Scheme.	The Trustee is to consider the covenant strength of the sponsor, 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 agreed investment strategy.
Interest rates and inflation	The risk of mismatch between the value of the Scheme's assets and present value of liabilities from changes in interest rates and inflation expectations.	To hedge 100% of interest rate and inflation risks.	Over the reporting period, the Scheme had allocations in LDI and Gilt based funds, which aim to hedge part of the Scheme's inflation and interest rate risk.
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.	To appoint managers who satisfy the following criteria, unless there is a good reason why the manager does not satisfy each criteria: 1. Responsible Investment ('RI') Policy / Framework 2. Implemented via Investment Process 3. A track record of using engagement and any voting rights to manage ESG factors 4. UN PRI Signatory.	As part of the investment management of the Scheme's assets, the Trustee expects the investment managers to make decisions on: • 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 (with the exception of ESG factors) are not taken into account in the selection, retention or realisation of investments.	The Scheme does not take non-financial matters into account in the selection, retention or realisation of investments.

Changes to the SIP

There have been no changes to the SIP over the 12-month reporting period. However the SIP has been updated since to reflect recent regulatory requirements as set out below.

Additionally, following the Scheme year end an investment strategy review is expected to be undertaken by the Trustee and the Scheme's principal employer.

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 their behalf. Mobius Life has adopted the managers' definitions 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 31 March 2023. Please note that Mobius can only provide month-end data, so for the 12 months ending 5 April 2023, data was not available and data to 31 March 2023 has been used as an alternative. The platform provider also provides examples of any significant votes where possible.

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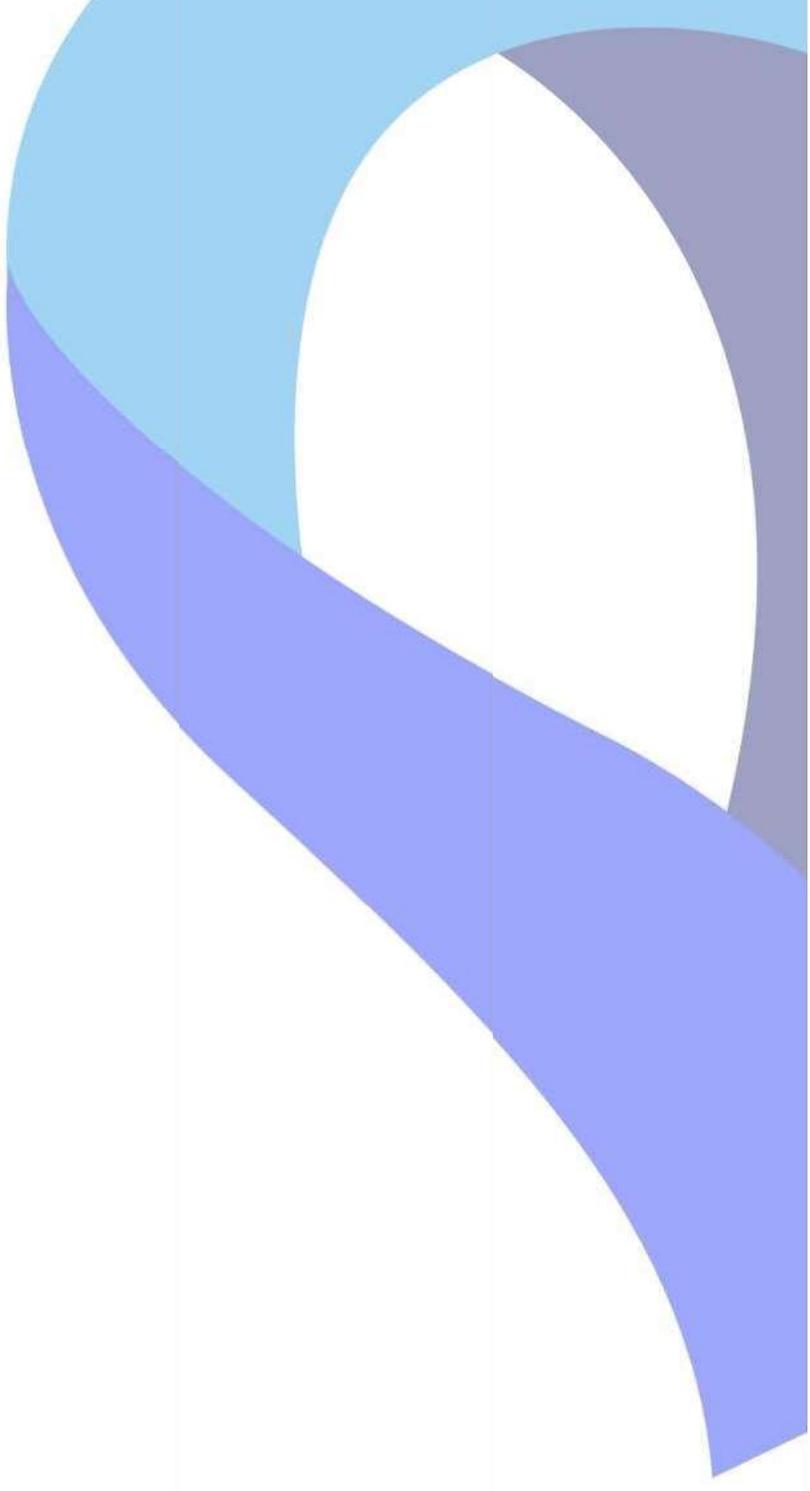
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Document classification: Public

Hayes & Finch Limited Pension Scheme - IS0008597

ESG REPORT – 31-Mar-2023





Summary

Scheme: Hayes & Finch Limited Pension Scheme - IS0008597

Statement Date: 31-Mar-2023

Fund	Value (£)	% Holding
L&G Life LUAD 5 15 Year Index Linked Gilt Fund	2,168,338.88	26.61%
Schroder Life Intermediated Diversified Growth Fund	138,556.43	1.70%
L&G Life AA All Stocks Gilt Index Fund	685,671.47	8.41%
L&G Life EB Investment Grade Corporate Bond All Stocks Index Fund	2,791,629.69	34.26%
L&G Life FABS Real Short Duration Fund	382,168.30	4.69%
L&G Life FABT Real Long Duration Fund	157,212.11	1.93%
M&G Total Return Credit Investment Fund	1,500,035.12	18.41%
L&G Life FABR Fixed Long Duration Fund	325,326.57	3.99%



Summary

Fund	Fund Manager ESG Credentials		Fund ESG Credentials	
	Data Provided by FM as at	% Qs answered	Data Provided by FM as at	Data Provided by FM as at
L&G Life AA All Stocks Gilt Index Fund	31/03/2023	97		31/03/2023
L&G Life LUAD 5-15 Year Index Linked Gilt Fund	31/03/2023	98		31/03/2023
L&G Life FABT Real Long Duration Fund	31/03/2023	97		31/03/2023
L&G Life EB Investment Grade Corporate Bond All Stocks Index Fund	31/03/2023	97		31/03/2023
L&G Life FABS Real Short Duration Fund	31/03/2023	97		31/03/2023
L&G Life FABR Fixed Long Duration Fund	31/03/2023	97		31/03/2023
M&G Total Return Credit Investment Fund	31/03/2023	83		31/03/2023
Schroder Life Intermediated Diversified Growth Fund	31/03/2023	97		31/03/2023



Summary

Disclaimer:

This report has been designed by Mobius Life to support Pension Schemes. Mobius Life understands 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	Legal and General (LGIM)	Yes
Do you have an ESG policy that is integrated into the investment process?	<p>Yes</p> <p>Our policies are implemented consistently at a firm-wide level. LGIM's purpose is to create a better future through responsible investing. Aligned to this purpose, ESG is a central underpinning to all of LGIM's activities and especially within strategic initiatives. LGIM has developed and publicly disclosed its policies for stewardship activities. Our policies are reviewed annually and updated where necessary to ensure they remain aligned with the various evolving regulations, best practice and client feedback.</p>	<p>Yes</p> <p>We have many people across the business contributing to our ESG insights and research. They sit across various teams with different levels of responsibility relating to ESG but all feed into our responsible investing capabilities. As at the end of June 2022, there are a total of 47 LGIM employees with roles dedicated to ESG, some of which are outlined in more detail below. • There are 20 people in our global Investment Stewardship team, led by Kurt Mortensen. The team is responsible for developing and carrying out LGIM's investment stewardship and responsible investment activities as well as the oversight, implementation and integration of ESG across the firm. • Nick Stansbury, Head of Climate Solutions, leads our energy transition approach and is one of our most prominent spokespeople on this topic. He leads our Climate Solutions team which has a total of four team members. • As Global Head of Responsible Investment Integration, Michael Marks' role spans all functions within LGIM from investment stewardship, distribution and investment teams to operational functions such as data and technology; embedding ESG across the firm in all areas and ensuring that focus is maintained on delivering the capabilities required by all stakeholders. • Amella Tan has recently joined LGIM as the Head of Responsible Investing Strategy for Investments (January 2022). This role ensures that LGIM stays at the cutting edge of innovation within responsible investing and creates a coordinated approach across asset classes, which is embedded throughout our funds and portfolios. • Caroline Ramsaar, Head of Sustainable Solutions, is responsible for engaging with clients on sustainability and the development of responsible investment solutions. This is a role which was created to develop LGIM's sustainable strategy. Two further colleagues are dedicated to supporting clients' journeys to adopt more responsible investing strategies. • LGIM's Real Assets team has a team of seven dedicated ESG experts working across the range of private credit and real estate strategies that we manage. As at the end of June 2022, we also have a further 62 colleagues across Investments whose roles have very substantial contribution to our responsible investing capabilities and whose objectives reflect this although their responsibilities are broader than solely ESG. Our Global Research and Engagement Groups (GREGs) bring together colleagues from across LGIM to identify the challenges and opportunities that will determine the resiliency of sectors and the companies within them. The output from the group strengthens and streamlines the firm's engagement activities across investments and stewardship, to enable us to collectively set goals and targets at a company level with one voice, whilst supporting and guiding our investment decisions across the capital structure. As at the end of June 2022, there are over 70 participants which includes members of our investment teams primarily along with representation from Investment Stewardship, who overlap on these groups.</p>
Do you have a firm ESG rating?	<p>Yes</p> <p>LGIM has an award-winning Investment Stewardship team, with a track record of over 20 years. External validation and oversight keep us on our toes and propels us forward to keep improving. We participate in industry-wide assessments of our engagement and stewardship processes and are proud to have been nominated by industry bodies like the ICGN, ICSSA and UN PRI for our: • Engagement activities disclosure • Market-wide involvement in lobbying activities • Strong implementation of ESG and corporate governance matters into our stewardship activities.</p>	<p>Yes</p> <p>There are a total of 37 LGIM employees with roles dedicated to ESG. In addition, we have a further 58 colleagues whose roles have very substantial contribution to our responsible investing capabilities and whose objectives reflect this although their responsibilities are broader than solely ESG.</p>
Are Senior Management accountable for ESG or Climate Change risk?	<p>Do you have a dedicated team that considers ESG and Climate Change related factors?</p>	<p>Yes</p> <p>There are a total of 37 LGIM employees with roles dedicated to ESG. In addition, we have a further 58 colleagues whose roles have very substantial contribution to our responsible investing capabilities and whose objectives reflect this although their responsibilities are broader than solely ESG.</p>



Fund Manager Business Response

Legal and General (LGI)	
Questions	Answers
Please provide your UNPRI survey scores.	Do you rely on any third parties to provide ESG and Climate Change related analysis/research? Yes Bloomberg, CDP, Diligent, HSBC, InfluenceMap, ISS, IVIS, Maplecroft, Refinitiv, RePRisk, Sustainalytics. We obtain a large ESG raw data set from a wide range of data and analysis providers which can be used for voting, engagement, research, index/portfolio construction and management. We typically licence raw data from such providers, as opposed to off-the-shelf ESG scores/rating, as we believe our knowledge and expertise of investing and engaging with companies are best placed to identify material and relevant ESG factors. This quantitative data is supplemented by qualitative research from academic and NGO research as well as self-side broker reports.
Do you have a Climate Change policy that is integrated into the investment process?	Do you create your own ESG or Climate Change related scores? Yes We have developed a rules-based methodology by which to score companies against ESG metrics; this generates the LGIM ESG Score. The LGIM ESG Score aligns with how we engage with, and vote on, the companies in which we invest. To facilitate this process, we publish the scores and explain the metrics on which they are based. In addition, the ESG score is used by our index teams in the creation of ESG aligned Index-products. We have identified 30 ESG indicators based on our expertise and experience in corporate reporting, corporate disclosures and transparency. We developed the scores with the aim of improving market standards globally, while monitoring ESG developments across our entire investment universe. The scores help drive our engagement process and are aligned with LGIM's voting policy and principles – we are more likely to vote against companies with poor scores at their annual general meetings (AGMs).
Does your company have a policy on equality and diversity in the workplace?	Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often? Yes Quarterly LGI is an award winning company, we are committed to delivering the right products and solutions to our clients and we believe the key to our success is our people. Steered by the Executive team, diversity and inclusion is embedded in our culture from the way we recruit, develop and connect with employees, to how we steward responsible investing through ESG. To show our commitment to making diversity and inclusion part of everything we do, the role of Head of Inclusion & Culture was created in 2018. Colette Comerford was appointed to the role with responsibility for driving the evolution and continuous improvement of LGIM's culture, diversity and inclusion objectives, working closely with the executive team, our Senior HR team, LEGIT (Legal & General Inclusion team) and LG's Group Diversity and Inclusion team.
Do ESG related factors get considered with respect to performance management of investment companies and funds?	Are you signatories of the FRC UK Stewardship Code or equivalent? Yes LGI has been a signatory to the UK Stewardship Code every year since its inception and we provide copies of our responses on our website.

Fund Manager Business Response

Questions	Legal and General (LGIM)
	ESG factors, meanwhile, as posing potential risks and opportunities, which can have a material impact on the performance of investments • Identifying the winners of the future, the companies to which investors will allocate ever-larger amounts of capital.

Questions	M&G Investments	Are Senior Management accountable for ESG or Climate Change risks?	Yes
Do you have an ESG policy that is integrated into the investment process?	<p>Yes</p> <p>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's ESG principles and reflect the firm's purpose and corporate values of Care and Integrity. - Details of M&G's ESG integration approach across all asset classes. - Further information on M&G's Engagement and Exclusion approaches.</p>	<p>Yes</p> <p>The Board is ultimately responsible for setting M&G's sustainability strategy and ESG values and principles. The Board delegates specific duties to sub-committees as follows: Reporting in the Annual Report and Accounts and any other material public documents in respect of climate change and ESG matters (for compliance with relevant regulations, legislation and standards) is included in the Audit Committee's terms of reference, available on our website. Assessment of ESG risk within the Group Risk Management Framework, including climate-related stress and scenario testing, the reporting of climate-related risk disclosures and provision of advice to the Board in setting M&G's ESG strategy, is included in the Risk Committee's terms of reference, available on our website. Responsibility for sustainability at an individual level is assigned to our Chief Financial Officer, who has previous experience in climate stress testing and sustainable impact investing.</p>	
Do you have a firm ESG rating?	<p>Yes</p>	<p>Yes</p> <p>The central ESG team at M&G Investments is the Stewardship & Sustainability (S&S) team, which currently comprises of 32 M&G employees. Additionally, there are numerous ESG specialists across the floor, embedded in investment teams. At M&G we believe that ESG integration should occur in all parts of our investment business and to reflect this everyone has an objective to this end. We look to continuously monitor S&S team resourcing levels to ensure the best quality of</p>	



Fund Manager Business Response

Questions	M&G Investments		
Please provide your UNPRI survey scores	We are advised not to report individual scores. Please see our 2021 UNPRI Assessment report to be read in conjunction with the Transparency link and UNPRI Assessment Method: Transparency Report	Do you rely on any third parties to provide ESG and Climate Change related analysis/research?	service is provided to clients. M&G will also ensure and make it the responsibility of all team members to keep up to date with the rapidly changing landscape of ESG to leverage resources effectively. The S&S team works collaboratively, both directly and via the analysts, to equip managers to make better-informed decisions, knowing the full spectrum of ESG risks that could impact their portfolios, as well as where these risks may be concentrated within certain issuers or holdings. By working in conjunction with the credit and equity analysts on ESG, the S&S team is able to ensure that ESG risks and opportunities are considered throughout the full investment process, as well as in the monitoring of companies.
Do you have a Climate Change policy that is integrated into the investment process?	Yes At M&G, we recognise the urgency of near-term action and are committed to using the levers at our disposal to support real-world emissions reductions and economy-wide change. Collaboration with our clients is critical to support our climate objectives and address related issues through our investments and stewardship. We have set the following climate objectives: 1. Reach net zero emissions by 2050, following Paris-aligned decarbonisation pathways for our investments. This is supported by our interim targets set across our asset manager and asset owner businesses. 2. Contribute to real-world positive impact by scaling investment in climate solutions. 3. Support a just transition and advocate for economy-wide change. We progressed well last year through multiple initiatives such as publishing our first progress report as part of the Net Zero Asset Managers initiative (NZAMI), disclosing our position and policy on thermal coal, and acquiring impact investing specialist responsibility. Our transition implementation strategy has four key actions: 1. Engage with investees to set and track progress against their net zero targets, ideally validated by the Science Based Targets Initiative (SBTI). 2. Engage with clients to encourage a move towards Paris-alignment of mandates and fund objectives 3. Increase capital directed to climate solutions, companies and projects 4. Transition portfolios, or if unsuccessful, divest	Do you create your own ESG or Climate Change related scores	Yes Yes, we have proprietary ESG scorecards to capture our ESG analysis.
Does your company have a policy on equality and diversity in the workplace?	Yes Diversity and Inclusion (D&I) drives inspirational performance and innovation. Our clients are all diverse, so having a team that reflects this diversity helps us better serve their needs and deliver results. Our Diversity and Inclusion policy applies to all UK M&G plc employees and the ethos should be followed by anyone who works with us.	Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?	Yes Yes, we publish firm-wide periodic reports and we also publish fund-related information on our website such as Eford Monthly Reviews, annually updated product information in the prospectus, Annual ESG Criteria report for our SICAV funds classified as SFDR Articles 8 & 9. Please see the following links for our latest sustainability report and stewardship report: M&G plc Sustainability Report 2022/23 (mandg.com) https://www.mandg.com/~media/Plcs/Plc/Mandg-Plc/documents/responsible-investing/stewardship/mg-investments-annual-stewardship-report-2022.pdf
Do ESG related factors get considered with respect to performance management of investment companies and funds?	Yes M&G believes that ESG factors can have a material impact on long-term investment outcomes. Our goal is to achieve the best possible risk-adjusted return for our clients, taking into account all factors that influence investment performance. Consequently, ESG issues are integrated into investment	Are you signatories of the FRC UK Stewardship Code or equivalent?	Yes The UK Stewardship Code 2020 sets high stewardship standards for both asset owners and asset managers. We were among the first tranches of signatories to the code in 2021, having reported in line with the code in both 2020 and 2021. In both these years we have demonstrated that our stewardship activities are in line with the code. We've done this in two ways: 1. Through this annual stewardship



Fund Manager Business Response

Questions	M&G Investments
	<p>decisions wherever they have a meaningful impact on risk or return. We apply this approach to ESG analysis across all of the asset classes and sectors in which we invest. Research and investment teams have access to internal proprietary ESG thematic research, as well as relevant data from other sources. They evaluate the impact and materiality of these ESG themes within the context of the industries and companies that they cover, with assistance from the Stewardship & Sustainability team. Together, these teams deliver actionable investment research that includes ESG issues, insights and recommendations to fund managers for use within the investment decision-making and portfolio construction processes.</p>
	<p>report, which highlights key activities from the previous year across equities, fixed income, property and infrastructure. 2. Through a static document, reviewed annually, that provides an overview of our stewardship approach, and specifically outlines how we adhere to the code. This can be found in the appendix of this report. Please see our latest Annual Stewardship Report for more context: mg-investments-annual-stewardship-report-2022.pdf (mandg.com)</p>

Questions	Schroders Investment Management Limited
<p>Do you have an ESG policy that is integrated into the investment process?</p>	<p>Yes</p> <p>Our Environmental, Social and Governance (ESG) Policy is available on our website at: https://prod.schroders.com/en/syglobalassets/global-assets/english/campaign/sustainability/integrity-documents/schroders-esg-policy.pdf</p> <p>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 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/syglobalassets/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/syglobalassets/about-us/schroders-engagement-blueprint-2022.pdf), which explains our principles around active ownership.</p>
	<p>Are Senior Management accountable for ESG or Climate Change risks?</p>
	<p>Yes</p> <p>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.</p> <p>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.</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>



Fund Manager Business Response

Questions	Schroders Investment Management Limited		
<p>Do you have a firm ESG rating?</p>	<p>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.)</p>	<p>Do you have a dedicated team that considers ESG and Climate Change related factors?</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> <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 with our regional investment desks and clients globally. We outline their key responsibilities and areas of focus below.</p> <p>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.</p> <p>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.</p> <p>3. Product</p>



Fund Manager Business Response

Schroders Investment Management Limited	
Questions	
<p>Please provide your UNPRI survey scores</p>	<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://ctf.unpri.org/dataportalv2/transparency.</p> <p>Module Investment & Stewardship Policy: Rating 4 stars Direct – Listed Equity (Active quantitative – incorporation): Rating 5 stars Direct – Listed Equity (Active fundamental – incorporation): Rating 5 stars Direct – Listed Equity (Investment trusts – incorporation): Rating 5 stars Direct – Listed Equity (Active quantitative – voting): Rating 5 stars Direct – Listed Equity (Active fundamental – voting): Rating 5 stars Direct – Listed Equity (Investment trusts – voting): Rating 5 stars Direct – Fixed Income – SSA: Rating 5 stars Direct – Fixed Income – Corporate: Rating 5 stars Direct – Fixed Income – Securitized: Rating 5 stars Direct – Real Estate: Rating 4 stars Indirect – Listed Equity – Passive: Rating 4 stars Indirect – Listed Equity – Active: Rating 4 stars Indirect – Fixed Income – Passive: Rating 4 stars Indirect – Fixed Income – Active: Rating 4 stars Indirect – Private Equity: Rating 5 stars</p>
<p>Do you have a Climate Change policy that is integrated into the investment process?</p>	<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>
<p>Do you rely on any third parties to provide ESG and Climate Change related analysis/research?</p>	<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>
<p>Do you create your own ESG or Climate Change related scores</p>	<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™ 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>



Fund Manager Business Response

Questions	Schroders Investment Management Limited
	<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 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>



Fund Manager Business Response

Schroders Investment Management Limited		
Questions		
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 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>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/syglobalassets/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>
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 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=495) 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/syglobalassets/about-us/schroders-engagement-blueprint-2022-1.pdf).



Fund Manager Business Response

Schroders Investment Management Limited	
Questions	Answers
<p>Do ESG related factors get considered with respect to performance management of investment companies and funds?</p>	<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 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>
<p>Are you signatories of the FRC UK Stewardship Code or equivalent?</p>	<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>
<p>Climate Transition Action Plan (https://www.schroders.com/en/sysglobalassets/digital/global/corporate-responsibility/climate-transition-action-plan.pdf).</p>	<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 Product Response

Activity	L&G Life AA All Stocks Gilt Index Fund	
Do you undertake Engagements for this fund?	Yes,	33
How many engagements were made regarding climate change?	27	3
How many engagements were made regarding waste reduction?		
How many engagements were made regarding other issues?	2	<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 • 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 engagements and outcomes from the last 12 months.		
Do you engage in voting for this fund?	No, Gilt Index Fund	LGIM's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by LGIM and we do not outsource any part of the strategic decisions. To ensure our proxy provider votes in
Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	LGIM's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by LGIM and we do not outsource any part of the strategic decisions. To ensure our proxy provider votes in accordance with our position on ESG, we have put in place a custom voting policy with specific voting instructions.	How many votes were proposed across the underlying companies in the fund?
How many times did you vote in favour of management?		How many times did you vote against management?



Fund Manager Product Response

Activity	L&G Life AA All Stocks Gilts Index Fund	N/A, Gilts Index Fund	N/A, Gilts Index Fund
<p>How many votes did you abstain from?</p>			
<p>Do you have a vote you consider the second most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'second most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, Gilts Index Fund</p> <p>N/A</p>	<p>Do you have a vote you consider the third most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'third most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, Gilts Index Fund</p>
<p>Do you have a vote you consider the fourth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fourth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, Gilts Index Fund</p>	<p>Do you have a vote you consider the fifth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fifth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, Gilts Index Fund</p>



Fund Manager Product Response

Activity	L&G Life AA All Stocks Gilt Index Fund	L&G Life LUAD 5 15 Year Index Linked Gilt Fund	N/A, Gilts Index Fund
<p>Do you have a vote you consider the sixth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'sixth most significant'? Approximate size of the fund's/ mandate's holding as at the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, Gilts Index Fund</p>	<p>Do you have a vote you consider the seventh most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'seventh most significant'? Approximate size of the fund's/ mandate's holding as at the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, Gilts Index Fund</p>
<p>Do you have a vote you consider the eighth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'eighth most significant'? Approximate size of the fund's/ mandate's holding as at the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, Gilts Index Fund</p>	<p>Do you have a vote you consider the ninth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'ninth most significant'? Approximate size of the fund's/ mandate's holding as at the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, Gilts Index Fund</p>
<p>Do you have a vote you consider the tenth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'tenth most significant'? Approximate size of the fund's/ mandate's holding as at the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, Gilts Index Fund</p>	<p>Do you monitor the carbon emission levels or similar of the underlying companies in the fund?</p>	<p>Yes - the fund produces approximately 183.6 Weighted Average Carbon Emissions Scope 1 + Scope 2 (Tonnes CO2e per 1 million USD Invested) as of 31 March 2023</p>
<p>What is the target turnover rate for the portfolio?</p>		<p>What was the actual turnover rate over the last 12 months?</p>	<p>0.05</p>



Fund Manager Product Response

Activity	L&G Life LUAD 5 15 Year Index Linked Gilts Fund
Do you undertake Engagements for this fund?	No, Gilts Index Fund
How many engagements were made regarding climate change?	
How many engagements were made regarding waste reduction?	
How many engagements were made regarding other issues?	
Please discuss some of the key engagements and outcomes from the last 12 months.	
Do you engage in voting for this fund?	No, Gilts Index Fund
Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	<p>LGIM's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by LGIM and we do not outsource any part of the strategic decisions. To ensure our proxy provider votes in accordance with our position on ESG, we have put in place a custom voting policy with specific voting instructions.</p>
How many times did you vote in favour of management?	
How many votes did you abstain from?	
	<p>How many engagements have you had with companies in the past 12 months?</p> <p>How many engagements were made regarding board diversity?</p> <p>How many engagements were made regarding financials?</p> <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 • Bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues <p>Do you conduct your own votes?</p> <p>How many votes were proposed across the underlying companies in the fund?</p> <p>How many times did you vote against management?</p> <p>Do you have a vote you consider the most significant for this fund?:</p> <ul style="list-style-type: none"> • Company name • Date of the Vote • Summary of the resolution • On which criteria have you assessed this vote to be 'most significant'? • Approximate size of the fund's/ mandate's holding as a title date of the vote
	N/A, Gilts Index Fund



Fund Manager Product Response

L&G Life LUAD 5 15 Year Index Linked Gilt Fund	
Activity	
<ul style="list-style-type: none"> Do you have a vote you consider the second most significant for this fund? Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be "second most significant"? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, Gilt Index Fund</p> <p>N/A</p>
<ul style="list-style-type: none"> Do you have a vote you consider the third most significant for this fund? Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be "third most significant"? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, Gilt Index Fund</p>
<ul style="list-style-type: none"> Do you have a vote you consider the fourth most significant for this fund? Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be "fourth most significant"? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, Gilt Index Fund</p>
<ul style="list-style-type: none"> Do you have a vote you consider the fifth most significant for this fund? Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be "fifth most significant"? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, Gilt Index Fund</p>
<ul style="list-style-type: none"> Do you have a vote you consider the sixth most significant for this fund? Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be "sixth most significant"? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, Gilt Index Fund</p>
<ul style="list-style-type: none"> Do you have a vote you consider the seventh most significant for this fund? Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be "seventh most significant"? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, Gilt Index Fund</p>



Fund Manager Product Response

Activity	L&G Life LUAD 5 15 Year Index Linked Gilt Fund	L&G Life FABT Real Long Duration Fund
company ahead of the vote?		
<p>Do you have a vote you consider the eighth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'eighth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A, Gilts Index Fund	<p>Do you have a vote you consider the ninth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'ninth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?
<p>Do you have a vote you consider the tenth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'tenth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A, Gilts Index Fund	
What is the target turnover rate for the portfolio?		0.05

Activity	L&G Life FABT Real Long Duration Fund
Do you undertake Engagements for this fund?	Yes, 33
How many engagements were made regarding climate change?	27 2



Fund Manager Product Response

Activity	L&G Life FABT Real Long Duration Fund
How many engagements were made regarding waste reduction?	How many engagements were made regarding financials?
How many engagements were made regarding other issues?	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 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 engagements and outcomes from the last 12 months.	
Do you engage in voting for this fund?	No, LDI Fund
Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	LGIM's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by LGIM and we do not outsource any part of the strategic decisions. To ensure our proxy provider votes in accordance with our position on ESG, we have put in place a custom voting policy with specific voting instructions.
How many times did you vote in favour of management?	How many times did you vote against management?
How many votes did you abstain from?	Do you have a vote you consider the most significant for this fund?: <ul style="list-style-type: none"> • Company name • Date of the Vote • Summary of the resolution • On which criteria have you assessed this vote to be 'most significant'? • Approximate size of the fund's/ mandate's holding as at the date of the vote • How did you vote? • Rationale of the voting decision • Outcome of the vote • Where you voted against management, did you communicate your intent to the company ahead of the vote?



Fund Manager Product Response

L&G Life FABT Real Long Duration Fund		N/A, LDI Fund	N/A, LDI Fund
<p>Activity</p> <p>Do you have a vote you consider the second most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'second most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A	<p>Do you have a vote you consider the third most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'third most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A, LDI Fund
<p>Do you have a vote you consider the fourth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fourth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A, LDI Fund	<p>Do you have a vote you consider the fifth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fifth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A, LDI Fund
<p>Do you have a vote you consider the sixth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'sixth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A, LDI Fund	<p>Do you have a vote you consider the seventh most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'seventh most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A, LDI Fund
<p>Do you have a vote you consider the eighth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'eighth most significant'? 	N/A, LDI Fund	<p>Do you have a vote you consider the ninth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'ninth most significant'? 	N/A, LDI Fund



Fund Manager Product Response

L&G Life FABT Real Long Duration Fund	
<p>Activity</p> <ul style="list-style-type: none"> Approximate size of the fund's/ mandate's holding as at the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? <p>Do you have a vote you consider the tenth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'tenth most significant'? Approximate size of the fund's/ mandate's holding as at the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? <p>What is the target turnover rate for the portfolio?</p>	<ul style="list-style-type: none"> Approximate size of the fund's/ mandate's holding as at the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? <p>Do you monitor the carbon emission levels or similar of the underlying companies in the fund?</p> <p>N/A,</p> <p>What was the actual turnover rate over the last 12 months? -0.47</p>
L&G Life EB Investment Grade Corporate Bond All Stocks Index Fund	
<p>Activity</p> <p>Do you undertake Engagements for this fund?</p> <p>How many engagements were made regarding climate change?</p> <p>How many engagements were made regarding waste reduction?</p> <p>How many engagements were made regarding other issues?</p> <p>Please discuss some of the key engagements and outcomes from the last 12 months.</p> <p>Do you engage in voting for this fund?</p>	<p>Yes,</p> <p>195</p> <p>61</p> <p>38</p> <p>17</p> <p>How many engagements were made regarding financials?</p> <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 <p>Do you conduct your own votes?</p> <p>LGM's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically</p>



Fund Manager Product Response

L&G Life EB Investment Grade Corporate Bond All Stocks Index Fund	
Activity	
Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	<p>LGIM's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by LGIM and we do not outsource any part of the strategic decisions. To ensure our proxy provider votes in accordance with our position on ESG, we have put in place a custom voting policy with specific voting instructions.</p> <p>4</p>
How many times did you vote in favour of management?	4
How many votes did you abstain from?	
Do you have a vote you consider the second most significant for this fund?	<p>No, There were no significant votes made in relation to the securities held by this fund during the reporting period.</p>
Do you have a vote you consider the most significant for this fund?	<p>How many votes were proposed across the underlying companies in the fund?</p> <p>4</p> <p>vote clients' shares. All voting decisions are made by LGIM and we do not outsource any part of the strategic decisions. To ensure our proxy provider votes in</p>
How many times did you vote against management?	
Do you have a vote you consider the third most significant for this fund?	<p>No, There were no significant votes made in relation to the securities held by this fund during the reporting period.</p>
Do you have a vote you consider the second most significant for this fund?	<p>No, There were no significant votes made in relation to the securities held by this fund during the reporting period.</p>



Fund Manager Product Response

L&G Life EB Investment Grade Corporate Bond All Stocks Index Fund	
<p>Activity</p> <p>Do you have a vote you consider the fourth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fourth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>No. There were no significant votes made in relation to the securities held by this fund during the reporting period.</p>
<p>Do you have a vote you consider the fifth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fifth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>No. There were no significant votes made in relation to the securities held by this fund during the reporting period.</p>
<p>Do you have a vote you consider the sixth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'sixth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>No. There were no significant votes made in relation to the securities held by this fund during the reporting period.</p>
<p>Do you have a vote you consider the seventh most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'seventh most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>No. There were no significant votes made in relation to the securities held by this fund during the reporting period.</p>
<p>Do you have a vote you consider the eighth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'eighth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>No. There were no significant votes made in relation to the securities held by this fund during the reporting period.</p>
<p>Do you have a vote you consider the ninth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'ninth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>No. There were no significant votes made in relation to the securities held by this fund during the reporting period.</p>
<p>Do you have a vote you consider the tenth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'tenth most significant'? 	<p>Yes - the fund produces approximately 125.2 Weighted Average Carbon Emissions Scope 1 + Scope 2, (Tonnes CO2e per 1 million USD Invested) as of 31 March 2023.</p>



Fund Manager Product Response

Activity	L&G Life EB Investment Grade Corporate Bond All Stocks Index Fund	L&G Life FABS Real Short Duration Fund
<ul style="list-style-type: none"> Approximate size of the fund's/ mandate's holding as at the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 		
What is the target turnover rate for the portfolio?	What was the actual turnover rate over the last 12 months?	
	-0.08	
Activity	L&G Life FABS Real Short Duration Fund	L&G Life FABS Real Short Duration Fund
Do you undertake Engagements for this fund?	Yes,	33
How many engagements were made regarding climate change?	27	2
How many engagements were made regarding waste reduction?		
How many engagements were made regarding other issues?		
Please discuss some of the key engagements and outcomes from the last 12 months.		
Do you engage in voting for this fund?	No, LDI Fund	
Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	LGIM's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by LGIM and we do not outsource any part of the strategic decisions. To ensure our proxy provider votes in accordance with our position on ESG, we have put in place a custom voting policy with specific voting instructions.	LGIM's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by LGIM and we do not outsource any part of the strategic decisions. To ensure our proxy provider votes in



Fund Manager Product Response

Activity		L&G Life FABS Real Short Duration Fund
How many times did you vote in favour of management?		
How many votes did you abstain from?		N/A, LDI Fund
Do you have a vote you consider the second most significant for this fund?:	<ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'second most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, LDI Fund</p> <p>N/A</p>
Do you have a vote you consider the fourth most significant for this fund?:	<ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fourth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, LDI Fund</p> <p>N/A, LDI Fund</p>
Do you have a vote you consider the third most significant for this fund?:	<ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'third most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, LDI Fund</p> <p>N/A, LDI Fund</p>
Do you have a vote you consider the fifth most significant for this fund?:	<ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fifth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, LDI Fund</p> <p>N/A, LDI Fund</p>



Fund Manager Product Response

Activity		L&G Life FABS Real Short Duration Fund
<p>company ahead of the vote?</p> <p>Do you have a vote you consider the sixth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'sixth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 		N/A, LDI Fund
<p>company ahead of the vote?</p> <p>Do you have a vote you consider the seventh most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'seventh most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 		N/A, LDI Fund
<p>company ahead of the vote?</p> <p>Do you have a vote you consider the eighth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'eighth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 		N/A, LDI Fund
<p>company ahead of the vote?</p> <p>Do you have a vote you consider the ninth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'ninth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 		N/A, LDI Fund
<p>company ahead of the vote?</p> <p>Do you have a vote you consider the tenth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'tenth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 		N/A, LDI Fund
<p>Do you monitor the carbon emission levels or similar of the underlying companies in the fund?</p>		



Fund Manager Product Response

L&G Life FABS Real Short Duration Fund	
Activity company ahead of the vote?	
What is the target turnover rate for the portfolio?	-0.32
L&G Life FABR Fixed Long Duration Fund	
Activity Do you undertake Engagements for this fund?	Yes, 33
How many engagements were made regarding climate change?	27
How many engagements were made regarding waste reduction?	2
How many engagements were made regarding other issues?	
Please discuss some of the key engagements and outcomes from the last 12 months.	<p>How many engagements have you had with companies in the past 12 months?</p> <p>How many engagements were made regarding board diversity?</p> <p>How many engagements were made regarding financials?</p> <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
Do you engage in voting for this fund?	No, LDI Fund
Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	<p>LGIM's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by LGIM and we do not outsource any part of the strategic decisions. To ensure our proxy provider votes in accordance with our position on ESG, we have put in place a custom voting policy with specific voting instructions.</p> <p>LGIM's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by LGIM and we do not outsource any part of the strategic decisions. To ensure our proxy provider votes in</p>



Fund Manager Product Response

L&G Life FABR Fixed Long Duration Fund	
Activity	
How many times did you vote in favour of management?	How many times did you vote against management?
How many votes did you abstain from?	Do you have a vote you consider the most significant for this fund? <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be "most significant"? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote?
Do you have a vote you consider the second most significant for this fund? <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be "second most significant"? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	Do you have a vote you consider the third most significant for this fund? <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be "third most significant"? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote?
Do you have a vote you consider the fourth most significant for this fund? <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be "fourth most significant"? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	Do you have a vote you consider the fifth most significant for this fund? <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be "fifth most significant"? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote?



Fund Manager Product Response

L&G Life FABR Fixed Long Duration Fund	
<p>company ahead of the vote?</p>	<p>of the vote?</p>
<p>Do you have a vote you consider the sixth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'sixth most significant'? Approximate size of the fund/s/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, LDI Fund</p> <p>Do you have a vote you consider the seventh most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'seventh most significant'? Approximate size of the fund/s/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?
<p>Do you have a vote you consider the eighth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'eighth most significant'? Approximate size of the fund/s/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, LDI Fund</p> <p>Do you have a vote you consider the ninth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'ninth most significant'? Approximate size of the fund/s/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?
<p>Do you have a vote you consider the tenth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'tenth most significant'? Approximate size of the fund/s/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the 	<p>N/A, LDI Fund</p> <p>Do you monitor the carbon emission levels or similar of the underlying companies in the fund?</p>



Fund Manager Product Response

L&G Life FABR Fixed Long Duration Fund	
Activity	
company ahead of the vote?	
What is the target turnover rate for the portfolio?	-0.04
What was the actual turnover rate over the last 12 months?	
M&G Total Return Credit Investment Fund	
Activity	
Do you undertake Engagements for this fund?	Yes, 3
How many engagements were made regarding climate change?	How many engagements have you had with companies in the past 12 months?
How many engagements were made regarding waste reduction?	How many engagements were made regarding board diversity?
How many engagements were made regarding other issues?	How many engagements were made regarding financials?
Please discuss some of the key engagements and outcomes from the last 12 months.	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 • Bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues
Do you engage in voting for this fund?	Do you conduct your own votes?
No,	N/A



Fund Manager Product Response

M&G Total Return Credit Investment Fund	
<p>Activity</p> <p>Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments.</p>	<p>N/A</p>
<p>How many times did you vote in favour of management?</p>	<p>How many votes were proposed across the underlying companies in the fund?</p>
<p>How many times did you abstain from?</p>	<p>How many times did you vote against management?</p>
<p>Do you have a vote, you consider the second most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'second most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote. How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>Do you have a vote you consider the most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote. How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?
<p>Do you have a vote, you consider the third most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'third most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote. How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A.</p>



Fund Manager Product Response

Activity	M&G Total Return Credit Investment Fund		
<p>Do you have a vote you consider the fourth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fourth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A.	<p>Do you have a vote you consider the fifth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fifth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A.
<p>Do you have a vote you consider the sixth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'sixth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A.	<p>Do you have a vote you consider the seventh most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'seventh most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A.
<p>Do you have a vote you consider the eighth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'eighth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A.	<p>Do you have a vote you consider the ninth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'ninth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A.
<p>Do you have a vote you consider the tenth most significant for this fund?:</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'tenth most significant'? 	N/A.	<p>Do you monitor the carbon emission levels or similar of the underlying companies in the fund?</p>	<p>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</p>



Fund Manager Product Response

Activity	M&G Total Return Credit Investment Fund	
<ul style="list-style-type: none"> Approximate size of the fund's/ mandate's holding as at the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 		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 IROCC guidelines. A separate TCFD product report is not available for this 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	
Do you undertake Engagements for this fund?	Yes,	How many engagements have you had with companies in the past 12 months?
How many engagements were made regarding climate change?	611	How many engagements were made regarding board diversity?
How many engagements were made regarding waste reduction?	54	How many engagements were made regarding financials?
How many engagements were made regarding other issues?	126	Which form of engagement is most representative of the approach taken for this fund over the last 12 months?
Please discuss some of the key engagements and outcomes from the last 12 months.	Please note our engagement questionnaires are based on the 1 year to the end of December 2022. Attached is the industry standard template which is used for reporting on engagements	<ul style="list-style-type: none"> Standardised letters to companies Bespoke letters to companies Active private engagement on specific issues Active public engagement on specific issues
Do you engage in voting for this fund?	Yes,	Do you conduct your own votes?
Do you use a third party to vote on your behalf?	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.	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).
If Yes, please provide the details of your provider and any comments	Institutional Shareholder Services (ISS)	How many votes were proposed across the underlying companies in the fund?



Fund Manager Product Response

Activity	Schröder Life Intermediated Diversified Growth Fund		
How many times did you vote in favour of management?	<p>Institutional Shareholder Services (ISS) act as our one service provider for the processing of all proxy votes in all markets. ISS delivers votes 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.</p>	How many times did you vote against management?	1514
How many votes did you abstain from?	93	<p>Do you have a vote you consider the most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be "most significant"? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>Yes, See attached PLSA for Information on our significant votes</p> <p>Broadcom Inc. 2022-04-04 Elect Director Harry L. You Significant Vote - MGT Governance Proposals ; ; Votes against mgmt</p> <p>Against Nominee sits on a number of external boards which may impact their role. Pass We may tell the company of our intention to vote against the recommendations of the board before voting, in particular if we are large shareholders or if we have an active engagement on the issue. We always inform companies after voting against any of the board's recommendations.</p>
Do you have a vote you consider the second most significant for this fund?	<p>Yes, See attached PLSA for Information on our significant votes</p> <p>Hewlett Packard Enterprise Company 2022-04-05 Advisory Vote to Ratify Named Executive Officers' Compensation Yes Against Insufficient vesting period for long-term incentive scheme and certain other concerns Pass We may tell the company of our intention to vote against the recommendations of the board before voting, in particular if we are large shareholders or if we have an active engagement on the issue. We always inform companies after voting against any of the board's recommendations.</p>	<p>Do you have a vote you consider the third most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be "third most significant"? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>Yes, See attached PLSA for Information on our significant votes</p> <p>Yatesa Wind Systems A/S 2022-04-05 Ratify PricewaterhouseCoopers as Auditors Significant Vote - MGT Governance Proposals ; ; Votes against mgmt</p> <p>Abstain No auditor rotation or tender process for over 10 years. Pass We may tell the company of our intention to vote against the recommendations of the board before voting, in particular if we are large shareholders or if we have an active engagement on the issue. We always inform companies after voting against any of the board's recommendations.</p>



Fund Manager Product Response

Schroder Life Intermediated Diversified Growth Fund			
<p>Activity</p> <p>Do you have a vote you consider the fourth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fourth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>Yes, See attached PLSA for Information on our significant votes</p> <p>UBS Group AG 2022-04-06 Batify PricewaterhouseCoopers as Auditors Significant Vote - Say on Climate, Significant Vote - MGT Governance Proposals; ; Votes against mgmt</p> <p>Against</p> <p>Lack of disclosure of bonus targets. Pass</p> <p>We may tell the company of our intention to vote against the recommendations of the board before voting, in particular if we are large shareholders or if we have an active engagement on the issue. We always inform companies after voting against any of the board's recommendations.</p>	<p>Do you have a vote you consider the fifth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fifth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>Yes, See attached PLSA for Information on our significant votes</p> <p>Silber AG 2022-04-06 Approve Remuneration Report (Non-Blinding) Significant Vote - MGT Governance Proposals; ; Votes against mgmt</p> <p>Against</p> <p>Lack of disclosure of bonus targets. A cautionary vote FOR the remuneration report is warranted, though not without concerns: - Only limited ex-post disclosure is provided to explain the evolution of variable payouts versus company performance. - Total CEO pay appears high relative to peers and in the context of TSR performance in the previous three-year period. The main reasons for supporting this item are: - The overall compensation framework is broadly in line with market practice. - Increased CEO pay partly results from the vesting of half of an extraordinary PSU grant, awarded as a retention instrument in response to US sanctions in 2018. We note that base pay has remained unchanged over the past three years.</p> <p>We may tell the company of our intention to vote against the recommendations of the board before voting, in particular if we are large shareholders or if we have an active engagement on the issue. We always inform companies after voting against any of the board's recommendations.</p>
<p>Do you have a vote you consider the sixth most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'sixth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>Yes, See attached PLSA for Information on our significant votes</p> <p>Husqvarna AB 2022-04-07 Approve Performance Share Incentive Program LTI 2022</p> <p>Significant Vote - MGT Governance Proposals; ; Votes against mgmt</p> <p>Lack of disclosure around the performance targets so unable to assess the stringency of the award. Pass</p> <p>We may tell the company of our intention to vote against the recommendations of the board before voting, in particular if we are large shareholders or if we have an active engagement on the issue. We always inform companies after voting against any of the board's recommendations.</p>	<p>Do you have a vote you consider the seventh most significant for this fund?</p> <ul style="list-style-type: none"> Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'seventh most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>Yes, See attached PLSA for Information on our significant votes</p> <p>AFC Energy Plc 2022-04-07 Accept Financial Statements and Statutory Reports Significant Vote - MGT Governance Proposals; ; Votes against mgmt</p> <p>Against</p> <p>A vote AGAINST this resolution is warranted because of the following reasons: - The Key Committees includes a non-independent member; - The performance conditions for the options granted to the Executive Directors relate to share price targets, a measure considered to have a number of drawbacks; - The options granted to the Executive Directors under the Transitional Award Plan vest in less than three years; and - Some of the outstanding awards of the Executive Director were repriced during the year under review. The board is less than 20% female.</p> <p>Pass</p> <p>We may tell the company of our intention to vote against the recommendations of the board before voting, in particular if we are large shareholders or if we have an active engagement on the issue. We always inform</p>



Fund Manager Product Response

Activity	S Schroder Life Intermediated Diversified Growth Fund		
<p>Do you have a vote you consider the eighth most significant for this fund?:</p> <ul style="list-style-type: none"> • Company name • Date of the Vote • Summary of the resolution • On which criteria have you assessed this vote to be 'eighth most significant'? • Approximate size of the fund's/ mandate's holding as a the date of the vote • How did you vote? • Rationale of the voting decision • Outcome of the vote • Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>Yes, See attached PLISA for Information on our significant votes</p> <p>Royal Bank of Canada 2022-04-07 Elect Director Kathleen Taylor Significant Vote - SH EKS Proposal; Significant Vote - MGT Governance Proposals; Significant Vote - SH Governance Proposal; ; Votes against mgmt</p> <p>Withhold The nominee is chair of the board, and we are not satisfied with the company's progress on climate transition. Pass We may tell the company of our intention to vote against the recommendations of the board before voting, in particular, if we are large shareholders or if we have an active engagement on the issue. We always inform companies after voting against any of the board's recommendations.</p>	<p>Do you have a vote you consider the ninth most significant for this fund?:</p> <ul style="list-style-type: none"> • Company name • Date of the Vote • Summary of the resolution • On which criteria have you assessed this vote to be 'ninth most significant'? • Approximate size of the fund's/ mandate's holding as a the date of the vote • How did you vote? • Rationale of the voting decision • Outcome of the vote • Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>Yes, See attached PLISA for Information on our significant votes</p> <p>CaixaBank SA 2022-04-07 Advisory Vote on Remuneration Report Significant Vote - MGT Governance Proposals; ; Votes against mgmt</p> <p>Against Less than 50% of STI targets are financial. Pass We may tell the company of our intention to vote against the recommendations of the board before voting, in particular if we are large shareholders or if we have an active engagement on the issue. We always inform companies after voting against any of the board's recommendations.</p>
<p>Do you have a vote you consider the tenth most significant for this fund?:</p> <ul style="list-style-type: none"> • Company name • Date of the Vote • Summary of the resolution • On which criteria have you assessed this vote to be 'tenth most significant'? • Approximate size of the fund's/ mandate's holding as a the date of the vote • How did you vote? • Rationale of the voting decision • Outcome of the vote • Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>Yes, See attached PLISA for Information on our significant votes</p> <p>Nestle SA 2022-04-07 Approve Remuneration Report Significant Vote - MGT Governance Proposals; ; Votes against mgmt</p> <p>Against Lack of disclosure around performance targets so unable to assess pay for performance alignment. Pass We may tell the company of our intention to vote against the recommendations of the board before voting, in particular, if we are large shareholders or if we have an active engagement on the issue. We always inform companies after voting against any of the board's recommendations.</p>	<p>Do you monitor the carbon emission levels or similar of the underlying companies in the fund?</p>	<p>104</p>
<p>What is the target turnover rate for the portfolio?</p>	<p>What was the actual turnover rate over the last 12 months?</p>		