



The Gowrings 1975 Pension Scheme

31 December 2022

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 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 Gowrings 1975 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 15 May 2023.

The SIP can be found online at the web address:

<https://gateleyplc.com/resources/statement-investment-principle-gowrings-1975-pension-scheme>

The Implementation Report 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
- voting behaviour covering the reporting year up to 31 December 2022 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 period to 31 December 2022 the Trustee reviewed the Scheme's investment strategy, with the intention of reducing the strategy's risk, by increasing the Scheme's interest rate and inflation hedging from 80% to 100% of Technical Provisions liabilities through a restructure of the Scheme's LDI allocations. Due to volatility in the Gilt market over Q3 and Q4 2022, the Scheme's transition to a new investment strategy was paused.

Post reporting year end, the Trustee agreed to implement a new investment strategy. The newly agreed strategy maintains the Scheme's 80% hedge, removes the allocation to Equity-Linked LDI Funds and introduces a new Infrastructure holding, diversifying the range of asset classes the Scheme invests in. A new SIP and IID were signed to reflect these changes and to account for new regulations.

Implementation Statement

This report demonstrates that the Gowrings 1975 Pension 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 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 assets and present value of liabilities from changes in interest rates and inflation expectations. | <p>To invest in matching assets that move in line with the present value of the scheme liabilities.</p> <p>Under the current SIP, the Scheme hedges 80% of these risks.</p> | <p>Over the reporting period, the Scheme was invested in Equity-Linked LDI and LDI investments, which aim to provide a degree of protection against adverse movements in interest rates and inflation expectations.</p> <p>Post year end, the Trustee agreed to disinvest from the Scheme's Equity-Linked LDI Funds following the advice from the Scheme's investment advisers.</p> |
| Liquidity | Difficulties in raising sufficient cash when required without adversely impacting the fair market value of the investment. | To maintain a sufficient allocation to liquid assets so that there is a prudent buffer to pay members benefits as they fall due (including transfer values), and to provide collateral to the LDI manager. | The Scheme's assets are held on the Mobius Life investment platform. Scheme assets are daily traded, and so liquidity risk is minimised. |

| | | | |
|--------------------------------------|--|--|---|
| 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. | <p>The Scheme invests in a range of pooled funds which comprise of underlying holdings across several asset classes.</p> <p>The Trustee is satisfied that the Scheme's exposure to market risk is reasonably reduced through asset diversification.</p> |
| 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 a credit-based fund which comprises of a range of underlying bond holdings to somewhat diversify underlying credit risk. |
| Environmental, Social and Governance | Exposure to Environmental, Social and Governance factors, including but not limited to climate change, which can impact the performance of the Scheme's investments. | The Trustee has formulated a set of ESG beliefs to help underpin overall investment decision making. The Trustee's ESG beliefs have been summarised in the Appendix A below. | <p>The Trustee will monitor the Scheme's assets against this Policy on an ongoing basis, with the assistance of their investment advisors. The Trustee views development of the Policy as an ongoing process as approaches to integrating ESG factors continue to evolve over time.</p> <p>When reviewing the Policy, the Trustee will take account of any significant developments in the market to ensure they are taking a best practice approach.</p> |
| 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. | The Scheme's investment holdings are all GBP denominated, avoiding any direct currency risk. |
| Non-financial | Any factor that is not expected to have a financial impact on the Scheme's investments. | Non-financial matters are not taken into account in the selection, retention or realisation of investments. | |

Changes to the SIP

There have been no changes to the SIP over the 12-month reporting period. However, following the Scheme year end an investment strategy review was undertaken, with an alternative strategy being agreed to by the Trustee and the Scheme's principal employer. The alternative strategy takes into account the need for schemes to have sufficient collateral and liquidity to back any LDI assets following the market volatility and Gilt crisis over Q3 and Q4 2022. The new strategy removes the Scheme's exposure to Equity-Linked LDI Funds and introduces an allocation to the Infrastructure Investment Fund.

A new SIP was signed in May 2023 to reflect the agreed strategy changes and changes to regulatory requirements.

Policies added to the SIP post reporting period

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

- The Trustee has acknowledged responsibility for the voting policies that are implemented by the Scheme's investment managers on their 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 their behalf.
- The Trustee, via their 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 their 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> |

The Trustee will also implement the more detailed policy through the following steps:

- i. The Trustee will continue to develop their understanding of ESG factors through training and engagement with their investment advisors.
- ii. The Trustee's ESG beliefs will be formally reviewed triennially or more frequently if required by the Trustee.
- iii. The Trustee will consider ESG criteria when selecting new funds for the Scheme to invest in.
- iv. The Trustee, with support from its investment advisors, will undertake an annual review of the asset managers' approach to integrating ESG factors.

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' definition of significant votes and has not set stewardship priorities. The managers have provided examples of votes they deem to be significant, and Mobius Life has shown the votes relating to the greatest exposure within the Scheme's investment. When requesting data annually, Mobius Life informs the managers what they deem most significant.

Please see attached document from Mobius Life for details on engagement and voting actions including a summary of the activity, covering the 12-month period ending 31 December 2022.

Appendix A

Risk Management

- i. Integrating ESG factors, including climate change risk, represents an opportunity to increase the effectiveness of the overall risk management of the Scheme.
- ii. ESG factors can be financially material and managing these risks forms part of the duty of the Trustee.
- iii. The Trustee will seek to ensure foreign currency exposure is hedged where appropriate when selecting the Scheme's strategy.

Investment Approach/Framework

- i. The Trustee will seek to integrate ESG considerations where appropriate when selecting the Scheme's strategy.
- ii. ESG factors are relevant to investment decisions in all asset classes.
- iii. Asset managers investing in companies' debt, as well as equity, have a responsibility to engage with management on ESG factors.

Voting & Engagement

- i. The Trustee will delegate the approach to voting and engagement to its underlying fund managers.
- ii. Engaging is more effective in seeking to initiate change than disinvesting.

Reporting

- i. Ongoing monitoring and reporting of how asset managers manage ESG factors is important. This will be delegated to the Scheme's investment advisors and reviewed annually.
- ii. ESG factors are dynamic and continually evolving; therefore, the Trustee will receive training as required to develop their knowledge.
- iii. The role of the Scheme's asset managers is prevalent in integrating ESG factors; the Trustee will, alongside the investment advisor, monitor ESG in relation to the asset managers' investment decisions.

Collaboration

- i. Asset managers should sign up and comply with common codes and practices such as the UNPRI and Stewardship code. If they do not sign up, they should have a valid reason why.
- ii. Asset managers should engage with other stakeholders and market participants to encourage best practice on various issues such as board structure, remuneration, sustainability, risk management and debtholder rights.

Gowrings 1975 Pension Scheme - IS0008873

ESG REPORT – 31-Dec-2022



Summary

Scheme: Gowrings 1975 Pension Scheme - IS0008873

Statement Date: 31-Dec-2022

| Fund | Value (£) | % Holding |
|---|--------------|-----------|
| L&G Life FABS Real Short Duration Fund | 380,042.80 | 4.37% |
| CT LDI Equity-linked Real Dynamic LDI Sub-Fund | 1,073,134.88 | 12.35% |
| Ninety One Global Multi-Asset Sustainable Growth Fund | 419,298.26 | 4.82% |
| CT LDI Equity-linked Nominal Dynamic LDI Sub-Fund | 1,173,773.56 | 13.50% |
| L&G Life FABP Fixed Short Duration Fund | 695,106.69 | 3.34% |
| Apollo Total Return Fund | 1,310,700.06 | 15.08% |
| Partners Group Generations Fund | 1,339,878.57 | 15.42% |
| L&G Life APBA Future World Fund GBP Currency Hedged | 944,394.70 | 10.87% |
| L&G Life FABR Fixed Long Duration Fund | 479,725.62 | 5.52% |
| L&G Life TA Sterling Liquidity Fund | 585,789.86 | 6.74% |

Summary

| Fund | Fund Manager ESG Credentials | Fund ESG Credentials | |
|---|------------------------------|----------------------|---------------------------|
| | Data Provided by FM as at | % Qs answered | Data Provided by FM as at |
| CT LDI Equity-linked Real Dynamic LDI Sub-Fund | 31/12/2022 | 75 | 31/12/2022 |
| L&G Life FABP Fixed Short Duration Fund | 31/12/2022 | 75 | 31/12/2022 |
| Ninety One Global Multi-Asset Sustainable Growth Fund | 31/12/2022 | 97 | 31/12/2022 |
| CT LDI Equity-linked Nominal Dynamic LDI Sub-Fund | 31/12/2022 | 75 | 31/12/2022 |
| L&G Life FABS Real Short Duration Fund | 31/12/2022 | 75 | 31/12/2022 |
| L&G Life APBA Future World Fund GBP Currency Hedged | 31/12/2022 | 75 | 31/12/2022 |
| L&G Life FABR Fixed Long Duration Fund | 31/12/2022 | 75 | 31/12/2022 |
| Apollo Total Return Fund | 31/12/2022 | 85 | 31/12/2022 |
| Partners Group Generations Fund | 31/12/2022 | 100 | 31/12/2022 |
| L&G Life TA Sterling Liquidity Fund | 31/12/2022 | 75 | 31/12/2022 |

Disclaimer:

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

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

Fund Manager Business Response

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

| Questions | Legal and General (LGIM) | | |
|---|---|---|---|
| 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> | Are Senior Management accountable for ESG or Climate Change risks? | <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 Morriesen. 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. • Amelia 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 Ramscar, 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, ICSA 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> | Do you have a dedicated team that considers ESG and Climate Change related factors? | <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> |
| Please provide your UNPRI survey scores | | Do you rely on any third parties to provide ESG and Climate Change related analysis/research? | <p>Bloomberg, CDP, Diligent, HSBC, InfluenceMap, ISS, IVIS, Maplecroft, Refinitiv, RepRisk, Sustainalytics We obtain a large ESG raw data set from a wide range of</p> |

| Questions | Legal and General (LGIM) | | |
|---|--|--|---|
| | | | 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 sell-side broker reports. |
| Do you have a Climate Change policy that is integrated into the investment process? | <p>Yes</p> <p>We have developed proprietary ESG tools, used across different asset classes and investment strategies, which incorporate climate change metrics such as carbon emissions, fossil fuel exposure or 'green' revenues. These tools are used to support fund managers, develop new investment solutions, assist the investment stewardship team in its engagements with companies, and help clients understand more about the climate risks and opportunities in their portfolios. LGIM has developed a bespoke climate solutions framework, Destination@Risk, which allows us to quantify the implications of different climate change scenarios across the global economy, key sectors, and individual securities, including a forward-looking assessment of 'temperature alignment'. The outputs of the framework are used to inform our climate-related engagements, to support our investment process, and to develop climate reporting for clients.</p> | Do you create your own ESG or Climate Change related scores | <p>Yes</p> <p>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).</p> |
| Does your company have a policy on equality and diversity in the workplace? | <p>Yes</p> <p>LGIM 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 L&G's Group Diversity and Inclusion team.</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>Quarterly</p> |
| Do ESG related factors get considered with respect to performance management of investment companies and funds? | <p>Yes</p> <p>ESG factors are embedded into our evaluation of investment opportunities across many investment strategies to identify unrewarded risk, and protect and enhance the long-term value of all our clients' investments. Our investment framework is designed with several objectives in mind: • Encouraging companies to improve their behaviour, and the quality of their ESG disclosures, we can raise the standards of entire markets, and help generate sustainable, long-term returns for our clients • Assessing a company's ESG risks: we see unmanaged 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-</p> | Are you signatories of the FRC UK Stewardship Code or equivalent? | <p>Yes</p> <p>LGIM has been a signatory to the UK Stewardship Code every year since its inception and we provide copies of our responses on our website.</p> |

Fund Manager Business Response

| Questions | Legal and General (LGIM) | | |
|-----------|----------------------------|--|--|
| | larger amounts of capital. | | |

| Questions | Ninety One | | |
|---|--|---|--|
| Do you have an ESG policy that is integrated into the investment process? | <p>Yes</p> <p>Yes - Each investment team are responsible for managing their exposure to sustainability risks and opportunities within the portfolios they manage. Investment capabilities have developed and continue to develop high-quality integration approaches to identify and value sustainability risks.</p> <p>Due to inherent differences in investment philosophies, styles, asset classes and data, ESG integration requires different approaches. However, we seek high quality ESG integration standards across all of our strategies, ensuring the range of ESG risks and opportunities are assessed and priced for.</p> | Are Senior Management accountable for ESG or Climate Change risks? | <p>Yes</p> <p>Yes</p> |
| Do you have a firm ESG rating? | No | Do you have a dedicated team that considers ESG and Climate Change related factors? | <p>Yes</p> <p>Yes</p> |
| Please provide your UNPRI survey scores | <p>2021 scores:</p> <p>Investment & Stewardship Policy - 4 stars Listed Equity - Incorporation - 4 stars</p> <p>Listed Equity - Voting - 4 stars</p> <p>Fixed Income - SSA - 5 stars</p> <p>Fixed Income - Corporate - 5 stars</p> <p>Infrastructure - 5 stars</p> | Do you rely on any third parties to provide ESG and Climate Change related analysis/research? | <p>Yes</p> <p>Yes. The ESG research and data that we have access to is integrated with the investment research process, and is used to support our understanding of material information. Data is integrated in various ways depending on the strategy, including scorecards, research dashboard, and use of vendor research reports.</p> <p>The Sustainability team and investment risk team look to ensure that the business has appropriate access to data and research. We use several internal and external sources, utilising both proprietary and market research.</p> <p>The primary ESG data sources that we make use of are: MSCI ESG, Carbon Disclosure Project, ISS, RepRisk, Bloomberg, Clarity AI and our in-house investment data platform Jasmine.</p> |
| Do you have a Climate Change policy that is integrated into the investment process? | <p>Yes</p> <p>Yes. Our climate change statement sits within our sustainability policy.</p> <p>We consider climate change as the biggest challenge confronting humanity in the current century. We therefore aim to put sustainability, with a focus on climate risk and transition, at the core of our business strategy.</p> <p>In our pursuit of net-zero global emissions to address climate change, we recognise that a range of critical ecological and human-related sustainability challenges require urgent action, and that participants in capital markets have an important role to play in addressing them.</p> <p>We wholeheartedly support the objectives of the Paris</p> | Do you create your own ESG or Climate Change related scores | <p>No</p> <p>No. We do not create our own ESG related scores. However, we use third party ESG/IVA ratings, ESG Controversy Flags and Governance Ratings as appropriate to help with our analysis. Our assessment of these factors is reflected in the valuation we ascribe to a stock, and the risk/reward trade-off of a stock that determines inclusion in the portfolio and position sizing.</p> |

| Questions | Ninety One | | |
|---|--|--|---|
| | <p>Agreement and investing that is aligned with the goal of net-zero emissions by 2050 or sooner. As a signatory to the Net Zero Asset Managers Initiative, we intend to decarbonise our operations (Scope 1, 2 & 3) over time and align our investment strategies with our pledge to net zero. We have sought to design net-zero targets for our investment teams aimed at driving real-world carbon reduction and allowing emerging markets to transition in a fair and inclusive manner.</p> <p>We have set the following targets for our investments:</p> <ul style="list-style-type: none"> - At least 50% of the financed emissions for corporate assets under management at Ninety One will be generated by companies with Paris-aligned science-based transition pathways by 2030, including science-based targets. - The proportion of our corporate AUM covered by Paris-aligned, science-based targets to exceed the SBTi verification standards for Ninety One. We calculate this requirement to be 56% of our corporate assets under management with transition pathways, including science-based targets, by 2030. - We will also undertake direct engagement with companies responsible for at least 80% of our financed emissions, prioritising engagements with our highest emitting companies⁴ to maximise the proportion of our corporate AUM and financed emissions with science-based transition pathways. <p>In general, as an asset manager we will:</p> <ol style="list-style-type: none"> 1. Develop ways to assess and measure the carbon exposure of companies in our portfolios. 2. Consider the impact of climate change when valuing companies through ESG integration strategies. 3. Engage with the largest corporate contributors to Ninety One's financed emissions to encourage them to address climate change by measuring, managing and reducing their real-world carbon footprints. | | |
| Does your company have a policy on equality and diversity in the workplace? | <p>Yes</p> <p>Doing the right thing' is part of our cultural identity and underpins everything we do at Ninety One. We know that diversity and inclusion make great business sense. It is also about doing the right thing for our clients, shareholders, our people and the communities in which we operate.</p> <p>Equality policy</p> <p>At the core of our values is the respect for the dignity and worth of the individual. Our imperative is to attract and retain the best talent by providing a corporate environment where people from varying backgrounds can develop professionally and build a rewarding career. While there may be minor nuances between the laws of the different countries in which the Company operates, the concepts outlined in our Equality policy enshrine our global approach to the principles of equality, embracing diversity and doing the right thing.</p> <p>We want everyone to have the opportunity to build a successful career and to thrive in a collaborative work environment. In addition to our Equality policy, we have established our own set of diversity principles and created a</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>Transparent reporting and communication with clients are key features of our "sustainability with substance" approach. We believe that being transparent about our stewardship approach is important, and this is reflected in our reporting to clients. We publish several regular and bespoke reports, which include:</p> <p>Sustainability and Stewardship report</p> <p>This report includes progress on integration across the investment teams over the year, engagement details, advocacy work, voting data, case studies and market trends and is published annually covering the period from 1 April to 31 March. You can access the report via the following link: https://ninetyone.com/-/media/documents/sustainability/91-sustainability-and-stewardship-report-2022-en.pdf</p> <p>PRI Transparency and Assessment reports</p> <p>As a signatory, it is mandatory to report annually on our responsible investment practices through the PRI Transparency report. Our latest PRI reports can be found on our website via the following link: https://ninetyone.com/-/media/documents/stewardship/91-pri-public-transparency-report-en.pdf</p> <p>Task Force on Climate-related Financial Disclosures (TCFD)</p> |

| Questions | Ninety One |
|-----------|--|
| | <p>framework for our ongoing journey that translates into four key areas of focus described below.</p> <p>Our Diversity Principles</p> <p>Our set of diversity principles, created in 2017, help define the framework for our on-going journey with regards to diversity and inclusion. These principles apply across the global business and incorporate key aspects of a number of more locally-based diversity and inclusion initiatives.</p> <ol style="list-style-type: none"> 1. In terms of diversity, we commit to zero variance in compensation on a like-for-like basis. 2. We will work proactively to rebalance our firm in line with the societies in which we operate. 3. We will measure and track progress annually. 4. Diversity forms part of the formal appraisal process (including a financial component) of all senior leaders and they are held accountable and responsible for ensuring change. 5. We believe in the importance and benefits of diversity and foster a culture that is supportive and inclusive of different perspectives and experiences. 6. As an active investment manager, diversity of thought and perspective is an essential component in developing our investment views. 7. As a global investment manager, diversity ensures that we represent the diversity of our global client base. 8. We are proud of our culture and our Diversity Principles sit within the context of our culture. In that sense, our commitment to diversity is fundamentally about 'doing the right thing'. 9. We foster a 'work ecosystem' that is flexible and responsive to the needs of all individuals and to that effect, we support flexible work arrangements where feasible. 10. We will work towards achieving our targets through concrete actions rather than employing quotas. <p>Our diversity and inclusion (D&I) framework</p> <p>We have created a D&I framework to enable change by considering diversity in all our people decisions. We apply our diversity principles practically through this framework using the following four key areas of focus.</p> <ol style="list-style-type: none"> 1. Commitment and accountability of our senior leadership team. <p>The leaders of our business are committed to creating a more balanced organisation and are held accountable for making progress. This includes our executive management, and our CEO Hendrik du Toit.</p> <p>Ninety One became a signatory of the Women in Finance Charter in 2018 and committed to achieving a target of 30% women in senior leadership by 2023. When we signed up to the Charter we had 26% female representation in our global senior leadership. In 2021 we met our target and we are now committed to proactively working towards a new target of 35% female representation in our senior leadership by 2024.</p> |

Ninety One formally pledged its support for the TCFD in September 2018 and this report sets out how we disclose our exposure to and management of climate risk, using the TCFD framework. You can access the report via the following link: <https://ninetyone.com/-/media/documents/reports/91-tcfd-report-2021-en.pdf>

Online voting disclosure

Voting decisions are disclosed publicly on a monthly basis on the Ninety One website and can be found on our website via the following link: <https://ninetyone.com/en/united-states/how-we-think/investing-for-a-world-of-change/sustainable-investing/invest/proxy-voting-results>

Annual Impact Reports

With regard to our Sustainability-focused products, our Annual Impact Reports present significant developments throughout the year, including all environmental metrics for the portfolios and underlying holdings as well as engagement goals and progress towards those goals. See the following links:
Global Environment Impact Report: <https://ninetyone.com/-/media/documents/impact-report/91-global-environment-impact-report-2022-en.pdf>

UK Sustainable Equity Impact Report: <https://ninetyone.com/-/media/documents/sustainability-report/91-uk-sustainable-equity-fund-sustainability-report-en.pdf>

Quarterly Sustainability Reports

Our quarterly sustainability reports provide an outline of the key sustainability risks and opportunities and cover the investment team's approach to sustainability integration; key engagements; proxy voting activity; portfolio climate risk analysis and portfolio characteristics.

Other sustainability disclosures

On our website we publish various sustainability disclosures as per regulatory requirements i.e. SFDR disclosures.

| Questions | Ninety One |
|-----------|---|
| | <p>Our senior executives pay is linked to the delivery of this target. For our 2022 reporting period we were pleased to report we now have 33% women in our global senior leadership.</p> <p>Alongside our senior leadership target, we strive for diverse representation on our boards. Our board of directors for Ninety One is comprised of 50% women and our global executive management team is 33% female.</p> <p>In our annual talent review process leaders are held accountable for managing diversity in their teams and building a diverse pipeline of talent. The data collected during this process is then analysed and presented to our business leaders, with a particular focus on diversity.</p> <p>2. Enabling change by embedding diversity in all our people decisions</p> <p>We have made diversity and inclusion a central consideration in all our decision making, especially when it comes to our people. We take a proactive approach to hiring, ensuring balanced and diversified shortlists and interview panels, and that our entry level recruitment creates a diverse pipeline of talent.</p> <p>We work with universities and support the following cross-industry initiatives to promote and attract diverse talent, including:</p> <p>'Investment 2020', which focuses on bringing diverse talent into all aspects of the asset management industry, including different socio-economic backgrounds.</p> <p>We work with 'Women Returners', whose mission is removing 'the career break penalty' for women who have taken an extended career break. By targeting this population we have the opportunity to increase gender diversity by providing opportunities for experienced and talented women to return to the industry.</p> <p>Ninety One has a generous family leave policy offering all expectant parents (including adoptive parents) six months full pay. This is available to all employees globally.</p> <p>We place a greater emphasis on productivity than presenteeism and actively encourage flexible working where appropriate.</p> <p>We are partnered with the 30% Club and Women Ahead to offer women across our global business an opportunity to be mentored by an external, seasoned business leader.</p> <p>We invested in diversity training that was designed to help all our employees become aware of their conscious and unconscious biases. The training was compulsory for all our employees because we believe that everyone shares a responsibility to recognise and remove barriers to inclusion. In this coming year we plan to build on this work, by working closely with our leaders to further explore this topic.</p> |

Fund Manager Business Response

| Questions | Ninety One | | |
|---|--|---|---|
| | <p>To help build a diverse talent pipeline, diversity is a key consideration in all our leadership development training opportunities.</p> <p>3. Measuring our progress so we can challenge and change</p> <p>We monitor key diversity statistics, so we can measure our progress, and use this data to inform our ongoing diversity and inclusion efforts. We share this data with business leaders, including the heads of our investment capabilities, to empower them to effect change.</p> <p>4. Promoting an inclusive work environment</p> <p>Our employee networks are essential for creating an environment where everyone can be themselves.</p> | | |
| Do ESG related factors get considered with respect to performance management of investment companies and funds? | <p>Yes</p> <p>ESG risk reporting forms part of the monthly Investment Risk Committee (IRC), which oversees the governance of all aspects of investment risk. ESG risk reporting also forms part of the reporting to the Sustainability Committee which oversees the overall response by the business to its commitment to ESG integration, including the effectiveness of the risk component.</p> | Are you signatories of the FRC UK Stewardship Code or equivalent? | <p>Yes</p> <p>Yes, Ninety One is a signatory to the updated 2020 UK Stewardship Code.</p> <p>The UK Stewardship Code 2020 is a substantial and ambitious revision to the 2012 edition of the Code. The new Code consists of 12 principles for asset managers and asset owners and sets high expectations of those investing money on behalf of UK savers and pensioners. Please refer to our latest Sustainability and Stewardship report for our response to the reporting requirements of the code.</p> |

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

Fund Manager Business Response

| Questions | Apollo Global Management, L.P. | | |
|---|---|---|--|
| Do you have a firm ESG rating? | No | Do you have a dedicated team that considers ESG and Climate Change related factors? | <p>Yes</p> <p>Yes. Apollo has made recent investments in leadership and expertise roles in areas of ESG and sustainability. These recent investments build upon Apollo's long-standing ESG program. The firm's broader sustainability strategy will be overseen by the firm's Chief Sustainability Officer.</p> <p>The ESG Steering Committee, which is comprised of certain members of the firm's Executive and Management Committees and numerous investment professionals with respect to both general and specific ESG issues, draws on recommendations from Apollo's cross-functional Green Teams from the Credit, Private Equity, and Real Assets businesses. Also, Dave Stangis, a Senior Partner and Chief Sustainability Officer, leads Apollo's sustainability strategy and reports to Mr. Kleinman and Mr. Zelter. Mr. Stangis also partners with Ms. Medley to build upon Apollo's long-standing ESG program.</p> <p>Apollo's ESG efforts are supported by an ESG team at Apollo including ESG counsel and associates, as well as a dedicated ESG team at Paul, Weiss, Rifkind, Wharton & Garrison LLP.</p> |
| Please provide your UNPRI survey scores | Apollo became a signatory in October 2020 and Apollo's Transparency Report and Assessment Reports are not yet available. | Do you rely on any third parties to provide ESG and Climate Change related analysis/research? | <p>Yes</p> <p>Our investment teams will leverage publicly disclosed information directly from the issuers as well as access to ESG data services such as Bloomberg for raw ESG data KPIs and SESAMm for natural language processing data and analytics associated with ESG risks and opportunities. We are currently evaluating multiple other data providers to assist but not replace our evaluation of ESG credit risks within our investment process. We are currently evaluating the potential for undertaking physical climate risk assessment for this fund. As it pertains to climate, we are currently evaluating both internal and external material data that is relevant for a specific issuer based on widely accepted ESG materiality frameworks.</p> |
| Do you have a Climate Change policy that is integrated into the investment process? | <p>Yes</p> <p>Climate is integrated within the environmental aspect of Apollo's Responsible Investing and ESG policy.</p> | Do you create your own ESG or Climate Change related scores | <p>Yes</p> <p>In Apollo's credit business, analysts prepare proprietary ESG risk scores for the majority of corporate credit issuers. The risk management of the fund's exposure to sustainability risk is based on our internal ESG credit rating process and oversight. While fundamental oversight of all credit risks (including ESG risks) are the responsibility of each individual investment team, our highest risk ESG ratings across the E, S and G pillars of a particular issuer require additional review. Investors are required to present a detailed analysis of the sustainability risks as well as risk mitigants that may support continued exposure. Outcomes from this ESG credit risk assessment may include divestment, reduction in exposure and/or engagement on material ESG issues. Additionally, our ESG credit ratings leverage our technology platform with the highest risk ESG credit ratings distributed for review to investment teams on a daily basis.</p> <p>ESG Corporate Credit Rating Sample Template In Apollo's sector-based ESG credit overall score and momentum:</p> <ol style="list-style-type: none"> 1) analysts consider identified qualitative and quantitative ESG factors; 2) ESG credit risk ratings are assigned to applicable subthemes; 3) momentum scores are assigned to pillars, enabling reflection of a forward-looking trajectory; 4) overall and pillar ESG credit risk ratings are automatically generated by weight; and 5) explanation for E, S, G, and overall ratings are provided. |
| Does your company have a policy on | Yes | Do you provide any reporting publicly or | Yes |



Fund Manager Business Response

| Questions | Apollo Global Management, L.P. | | |
|---|--------------------------------|---|---|
| equality and diversity in the workplace? | Yes | to clients with regard to ESG and Climate Change related issues? How often? | At a firm level, Apollo provides regular updates about its ESG program to limited partners through its ESG Annual Report. |
| Do ESG related factors get considered with respect to performance management of investment companies and funds? | Yes | Are you signatories of the FRC UK Stewardship Code or equivalent? | <p>No</p> <p>While Apollo is not currently a signatory to the UK Stewardship Code, we are currently in the process of evaluating joining it.</p> <p>However, as of October 2020, Apollo is a signatory to UNPRI and the Operating Principles for Impact Management. Apollo is also a member of the SASB Alliance, the Ceres Investor Network on Climate Risk and Sustainability, the ESG Data Convergence Project, Impact Capital Managers, the ILPA Diversity in Action Initiative, the Board Diversity Action Alliance, CEO Action Coalition for Diversity & Inclusion, and the Thirty Percent Coalition. Apollo has aligned its ESG Report Volume 12 with the UN Sustainable Development Goals ("SDGs") and the Global Reporting Initiative ("GRI") Standards.</p> |

| Questions | Partners Group AG | | |
|---|--|--|--|
| Do you have an ESG policy that is integrated into the investment process? | <p>Yes</p> <p>Yes. Partners Group aims to realize potential in private markets and create sustainable returns with a lasting, positive impact for all of its stakeholders, in line with its fiduciary duty and return-generating goals.</p> | Are Senior Management accountable for ESG or Climate Change risks? | <p>Yes</p> <p>André Frei, former Co-CEO and now Chairman of Sustainability of Partners Group, is responsible for the firm's overall sustainability strategy. In this role he prioritizes and coordinates portfolio and corporate sustainability efforts, in interaction with the Partners Group's Executive Committee.</p> |
| Do you have a firm ESG rating? | <p>Yes</p> <p>Partners Group has become the only global private markets firm to be included in the Dow Jones Sustainability Indices (DJSI), reflecting the firm's position as a corporate sustainability leader in private markets.</p> | Do you have a dedicated team that considers ESG and Climate Change related factors? | <p>No</p> <p>The ESG team is embedded within the wider investment team and has responsibility for the framework that guides investment DD and monitoring. The team also engages with the portfolio businesses</p> |
| Please provide your UNPRI survey scores | 5 stars: Private Equity; 4 stars: Investment & Stewardship Policy, Infrastructure, Debt; 3 stars: Real estate | Do you rely on any third parties to provide ESG and Climate Change related analysis/research? | <p>Yes</p> <p>As a private markets firm, we conduct the most part of our ESG & Sustainability research ourselves. Prior to investing Partners Group engages external service providers including: EY, PwC, KPMG, ERM, Ramboll. During ownership Partners Group uses the services of ESG providers including: Sancroft and Gallup</p> |
| Do you have a Climate Change policy that is integrated into the investment process? | <p>Yes</p> <p>Yes. While addressing climate change will require action from governments and society, we believe that private market investment managers and investors are uniquely positioned to support the transition to a low-carbon economy through systematic assessment and management of climate risks and opportunities.</p> | Do you create your own ESG or Climate Change related scores | <p>No</p> <p>Not provided</p> |
| Does your company have a policy on equality and diversity in the workplace? | <p>Yes</p> <p>Yes. The Diversity and Inclusion Policy ("Policy") sets forth Partners Group's commitment to promoting a diverse and</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>Depending on the product Partners Group includes ESG related topics in monthly/quarterly reports. Partners Group also produces an annual CSR report</p> |



Fund Manager Business Response

| Questions | Partners Group AG | | |
|---|---|---|--|
| | inclusive workplace, articulates guiding principles and ambitions towards diversity and inclusion, and specifies the organization and responsibilities of the groups charged with advancing Partners Group's diversity and inclusion initiatives. In addition to affirming Partners Group's values, the Policy constitutes the basis for effective diversity and inclusion management at Partners Group, and what the company believes best supports its business, clients, and people. | | with key ESG updates, including the publication of the ESG dashboards for each asset class - within these dashboards each asset is tracked and measured across key KPIs |
| Do ESG related factors get considered with respect to performance management of investment companies and funds? | Yes Yes | Are you signatories of the FRC UK Stewardship Code or equivalent? | No Partners Group is not a signatory to the code. Note that given the UK Stewardship Code only applies to UK funds, only our Generations Fund would fall under direct scope (our other programs are domiciled in Luxembourg, Guernsey etc.) |

Fund Manager Product Response

| Activity | CT LDI Equity-linked Real Dynamic LDI Sub-Fund | | |
|---|--|--|------------------------------|
| How many engagements have you had with companies in the past 12 months? | | Do you conduct your own votes? | Not applicable for this fund |
| How many engagements were made regarding climate change? | | Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments | Not applicable for this fund |
| How many engagements were made regarding board diversity? | | How many votes were proposed across the underlying companies in the fund? | 32 |
| How many engagements were made regarding waste reduction? | | How many times did you vote in favour of management? | |
| How many engagements were made regarding financials? | | How many times did you vote against management? | |
| How many engagements were made regarding other issues? | | How many votes did you abstain from? | |
| Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> • Sending standardised letters to companies • Sending bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues | | Please discuss some of the key votes and outcomes from the last 12 months. | Not applicable for this fund |
| Please discuss some of the key engagements and outcomes from the last 12 months. | <p>Barclays PLC</p> <p>At the Q3 investor update, the company announced that it was accelerating its timeline to phase out the financing of thermal coal power in the US from 2035 to 2030, in line with its approach in the UK and EU. The decision was taken as a result of engagement with shareholders and the introduction of the Inflation Reduction Act in the US.</p> <p>HSBC Holdings PLC</p> <p>HSBC has updated its energy policy to include the ending of funding for new oil and gas projects. In particular it states: HSBC will not provide new finance, or new advisory services, to any client for the specific purposes of O&G exploration, appraisal, development, and production pertaining to:</p> <ul style="list-style-type: none"> • ultra-deepwater offshore O&G projects; • shale oil projects; extra heavy oil projects; • projects in environmentally and socially critical areas; • infrastructure whose primary use is in conjunction with the above activities. | Do you monitor the carbon emission levels or similar of the underlying companies in the fund? | Not Provided |
| What is the target turnover rate for the portfolio? | | What was the actual turnover rate over the last 12 months? | |

Fund Manager Product Response

| Activity | L&G Life FABP Fixed Short Duration Fund | | |
|---|---|--|---|
| How many engagements have you had with companies in the past 12 months? | | Do you conduct your own votes? | 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 |
| How many engagements were made regarding climate change? | | Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments | 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 engagements were made regarding board diversity? | | How many votes were proposed across the underlying companies in the fund? | |
| How many engagements were made regarding waste reduction? | | How many times did you vote in favour of management? | |
| How many engagements were made regarding financials? | | How many times did you vote against management? | |
| How many engagements were made regarding other issues? | | How many votes did you abstain from? | |
| Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> • Sending standardised letters to companies • Sending bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues | | Please discuss some of the key votes and outcomes from the last 12 months. | |
| Please discuss some of the key engagements and outcomes from the last 12 months. | | Do you monitor the carbon emission levels or similar of the underlying companies in the fund? | |
| What is the target turnover rate for the portfolio? | | What was the actual turnover rate over the last 12 months? | |

| Activity | Ninety One Global Multi-Asset Sustainable Growth Fund | | |
|----------|---|--|--|
|----------|---|--|--|

Fund Manager Product Response

| Activity | Ninety One Global Multi-Asset Sustainable Growth Fund | | |
|---|--|--|--|
| How many engagements have you had with companies in the past 12 months? | 37 | Do you conduct your own votes? | Yes |
| How many engagements were made regarding climate change? | 11 | Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments | Ninety One does not outsource the voting decision, as we carry out the decision and execution of the vote in house. We use an external proxy research and vote execution service provided by Institutional Shareholder Services (ISS) to produce tailored reports. We use ISS to provide us with a service through which they deliver both their benchmark research and Ninety One's custom policy research. These reports include vote recommendations (not instructions) that arise from applying Ninety One's voting guidelines. The vote decision is then reached by the relevant investment teams in accordance with the investment philosophy, supported by an Operational voting team. Through this rigorous voting process, we can be certain the voting done is in the best interest of our clients. |
| How many engagements were made regarding board diversity? | 2 | How many votes were proposed across the underlying companies in the fund? | 1003 |
| How many engagements were made regarding waste reduction? | 1 | How many times did you vote in favour of management? | 928 |
| How many engagements were made regarding financials? | 2 | How many times did you vote against management? | 61 |
| How many engagements were made regarding other issues? | 21 | How many votes did you abstain from? | 4 |
| Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> • Sending standardised letters to companies • Sending bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues | Active private engagement on specific issues | Please discuss some of the key votes and outcomes from the last 12 months. | Please refer to tab |
| Please discuss some of the key engagements and outcomes from the last 12 months. | <p>Ansys "Governance - Board effectiveness - Diversity Environment - Climate change" "We wanted to provide you with an example of engagement with one of our decarbonisation impact equity holdings within the portfolio."</p> <p>Ansys develops simulation software for computer-aided engineering, which is used to predict how products will behave in the real world. Its software allows customers to reduce material inputs, increase energy efficiency and stimulate innovation within low-carbon technologies across</p> | Do you monitor the carbon emission levels or similar of the underlying companies in the fund? | Yes |

Fund Manager Product Response

| Activity | Ninety One Global Multi-Asset Sustainable Growth Fund | | |
|---|--|--|--------|
| | <p>renewable technologies, electrification solutions, and building and industrial processes. Our main engagement goals for the company this year includes board gender diversity and carbon avoided reporting. "</p> <p>Over the quarter, we met the Chair of Nominating and Corporate Governance Committee as well as the Head of Sustainability.</p> <p>"We discussed with them how they plan to improve board gender diversity. We communicated our desire to see board gender diversity move higher and the company confirmed that they are looking to improve board gender diversity with any new additions to the board as well as focusing on improving diversity in the broader organisation. The company have also developed partnerships with universities to expand the diversity of their pool of applicants. They have also conducted unconscious-bias training for senior leadership. They have now achieved 50% gender diversity for all direct reports to the CEO.</p> <p>In relation to carbon avoided reported, we were please to see the company has expanded its product handprint use cases which detail how Ansys products are supporting the development of more sustainable products. This includes use cases for Aerospace and Semiconductor applications.</p> <p>On the topic of Net-Zero, we encouraged the company to go through the Science-Based Target (SBT) process to ensure their carbon emissions reduction target was rigorous and sufficiently ambitious. "</p> | | |
| What is the target turnover rate for the portfolio? | | What was the actual turnover rate over the last 12 months? | 0.6896 |

| Activity | CT LDI Equity-linked Nominal Dynamic LDI Sub-Fund | | |
|---|---|---|------------------------------|
| How many engagements have you had with companies in the past 12 months? | | Do you conduct your own votes? | Not applicable for this fund |
| How many engagements were made regarding climate change? | | <p>Do you use a third party to vote on your behalf?</p> <p>If Yes, please provide the details of your provider and any comments</p> | Not applicable for this fund |
| How many engagements were made regarding board diversity? | | How many votes were proposed across the underlying companies in the fund? | 32 |
| How many engagements were made regarding waste reduction? | | How many times did you vote in favour of management? | |
| How many engagements were made regarding financials? | | How many times did you vote against management? | |

Fund Manager Product Response

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

| Activity | L&G Life FABS Real Short Duration Fund | | |
|---|--|---|---|
| How many engagements have you had with companies in the past 12 months? | | Do you conduct your own votes? | 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 |
| How many engagements were made regarding climate change? | | <p>Do you use a third party to vote on your behalf?</p> <p>If Yes, please provide the details of your provider and any comments</p> | 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. |

Fund Manager Product Response

| Activity | L&G Life FABS Real Short Duration Fund | | |
|--|--|---|--|
| | | | |
| How many engagements were made regarding board diversity? | | How many votes were proposed across the underlying companies in the fund? | |
| How many engagements were made regarding waste reduction? | | How many times did you vote in favour of management? | |
| How many engagements were made regarding financials? | | How many times did you vote against management? | |
| How many engagements were made regarding other issues? | | How many votes did you abstain from? | |
| Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> • Sending standardised letters to companies • Sending bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues | | Please discuss some of the key votes and outcomes from the last 12 months. | |
| Please discuss some of the key engagements and outcomes from the last 12 months. | | Do you monitor the carbon emission levels or similar of the underlying companies in the fund? | |
| What is the target turnover rate for the portfolio? | | What was the actual turnover rate over the last 12 months? | |

| Activity | L&G Life APBA Future World Fund GBP Currency Hedged | | |
|---|---|--|---|
| How many engagements have you had with companies in the past 12 months? | 528 | Do you conduct your own votes? | 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 |
| How many engagements were made regarding climate change? | 113 | 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. |

Fund Manager Product Response

| Activity | L&G Life APBA Future World Fund GBP Currency Hedged | | |
|---|---|---|---|
| How many engagements were made regarding board diversity? | 62 | How many votes were proposed across the underlying companies in the fund? | 25193 |
| How many engagements were made regarding waste reduction? | | How many times did you vote in favour of management? | 20149 |
| How many engagements were made regarding financials? | | How many times did you vote against management? | 4586 |
| How many engagements were made regarding other issues? | 74 | How many votes did you abstain from? | 144 |
| Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> • Sending standardised letters to companies • Sending bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues | | Please discuss some of the key votes and outcomes from the last 12 months. | |
| Please discuss some of the key engagements and outcomes from the last 12 months. | | Do you monitor the carbon emission levels or similar of the underlying companies in the fund? | Yes - the fund produces approximately 172.9 Weighted Average Carbon Emissions Scope 1 + Scope 2 (Tonnes CO2e per 1 million USD Invested) as of 31 December 2022 |
| What is the target turnover rate for the portfolio? | | What was the actual turnover rate over the last 12 months? | 0.02 |

| Activity | L&G Life FABR Fixed Long Duration Fund | | |
|---|--|--|---|
| How many engagements have you had with companies in the past 12 months? | | Do you conduct your own votes? | 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 |
| How many engagements were made regarding climate change? | | Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments | 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 engagements were made regarding board diversity? | | How many votes were proposed across the underlying companies in the fund? | |

Fund Manager Product Response

| Activity | L&G Life FABR Fixed Long Duration Fund | | |
|--|--|---|--|
| How many engagements were made regarding waste reduction? | | How many times did you vote in favour of management? | |
| How many engagements were made regarding financials? | | How many times did you vote against management? | |
| How many engagements were made regarding other issues? | | How many votes did you abstain from? | |
| Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> • Sending standardised letters to companies • Sending bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues | | Please discuss some of the key votes and outcomes from the last 12 months. | |
| Please discuss some of the key engagements and outcomes from the last 12 months. | | Do you monitor the carbon emission levels or similar of the underlying companies in the fund? | |
| What is the target turnover rate for the portfolio? | | What was the actual turnover rate over the last 12 months? | |

| Activity | Apollo Total Return Fund | | |
|---|--------------------------|--|-----|
| How many engagements have you had with companies in the past 12 months? | 54 | Do you conduct your own votes? | N/A |
| How many engagements were made regarding climate change? | | Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments | N/A |
| How many engagements were made regarding board diversity? | | How many votes were proposed across the underlying companies in the fund? | |
| How many engagements were made regarding waste reduction? | | How many times did you vote in favour of management? | |
| How many engagements were made regarding financials? | | How many times did you vote against management? | |
| How many engagements were made regarding other issues? | | How many votes did you abstain from? | |

Fund Manager Product Response

| Activity | Apollo Total Return Fund | | |
|---|--|---|-----|
| Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> Sending standardised letters to companies Sending bespoke letters to companies Standard period engagement with companies Active private engagement on specific issues Active public engagement on specific issues | Standard period engagement with companies | Please discuss some of the key votes and outcomes from the last 12 months. | N/A |
| Please discuss some of the key engagements and outcomes from the last 12 months. | Environmental - 47 Social - 33 Governance - 25 Moss Creek is an independent oil and gas company focused on exploration. The company has a high ESG Credit Risk Rating of 3.05 which falls in the bottom half of the high ESG risk category. We assess the company's environmental risk as high given the inherent GHG and pollution risks associated with the company's oil and gas exploration and production operations. Moss also faces elevated governance risks. It is ultimately owned and controlled by a Chinese entity called Shandong Xinchao that is listed on the Shanghai Stock Exchange. The Company's credit agreements and indentures allow for equity distributions to the parent entity. In November 2022, we engaged with Moss Creek to understand how it is mitigating these risks. To mitigate its environmental impact, Moss Creek shared with us that the company has prioritized reducing emissions in its operations, primarily by reducing flaring and through the build out of an extensive water infrastructure and recycling system (which reduces the need for thousands of miles of truck driving and for freshwater extraction). Moss Creek's US assets are ringfenced from the parent entity, mitigating governance risks. Management has taken strides to improve its governance structure (most notably via the creation of a Corporate Responsibility Team and the engagement of a third-party consultant to gather stakeholder feedback). | Do you monitor the carbon emission levels or similar of the underlying companies in the fund? | Yes |
| What is the target turnover rate for the portfolio? | 40 | What was the actual turnover rate over the last 12 months? | 27 |

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

Fund Manager Product Response

| Activity | Partners Group Generations Fund | | |
|---|--|---|--|
| | | | investments, working with one of the major proxy advising companies in the world - Glass Lewis. Glass Lewis does in-depth research on each ballot item and recommends voting in line with the list of guidelines best practice and considering local market standards. Glass Lewis also votes primarily according to Partners Group's Proxy Voting Policy. |
| How many engagements were made regarding board diversity? | | How many votes were proposed across the underlying companies in the fund? | 959 |
| How many engagements were made regarding waste reduction? | | How many times did you vote in favour of management? | 915 |
| How many engagements were made regarding financials? | | How many times did you vote against management? | 22 |
| How many engagements were made regarding other issues? | | How many votes did you abstain from? | 15 |
| Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> • Sending standardised letters to companies • Sending bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues | Active private engagement on specific issues, Standard period engagement with companies | Please discuss some of the key votes and outcomes from the last 12 months. | While we track our limited voting activity and ensure it falls in line with our approach to ESG & Sustainability, we do not see it as key engagements. |
| Please discuss some of the key engagements and outcomes from the last 12 months. | As a private markets firm, we hold controlling stakes in our investment companies. Consequentially, our engagement is of an ongoing nature and we do not track individual exchanges. | Do you monitor the carbon emission levels or similar of the underlying companies in the fund? | Yes, for the direct investments in the strategy we collect carbon data on a best effort basis. |
| What is the target turnover rate for the portfolio? | | What was the actual turnover rate over the last 12 months? | 9.1 |

| Activity | L&G Life TA Sterling Liquidity Fund | | |
|---|-------------------------------------|--|---|
| How many engagements have you had with companies in the past 12 months? | 34 | Do you conduct your own votes? | 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 |
| How many engagements were made regarding climate change? | 21 | 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. |

Fund Manager Product Response

| Activity | L&G Life TA Sterling Liquidity Fund | | |
|--|-------------------------------------|---|--|
| | | | |
| How many engagements were made regarding board diversity? | 3 | How many votes were proposed across the underlying companies in the fund? | |
| How many engagements were made regarding waste reduction? | | How many times did you vote in favour of management? | |
| How many engagements were made regarding financials? | | How many times did you vote against management? | |
| How many engagements were made regarding other issues? | 2 | How many votes did you abstain from? | |
| Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> • Sending standardised letters to companies • Sending bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues | | Please discuss some of the key votes and outcomes from the last 12 months. | |
| Please discuss some of the key engagements and outcomes from the last 12 months. | | Do you monitor the carbon emission levels or similar of the underlying companies in the fund? | Yes - the fund produces approximately 22.5 Weighted Average Carbon Emissions Scope 1 + Scope 2 (Tonnes CO2e per 1 million USD Invested) as of 31 December 2022 |
| What is the target turnover rate for the portfolio? | | What was the actual turnover rate over the last 12 months? | -6.22 |

Important Information

Mobius Life Limited (Mobius Life) has prepared this report for professional advisers and institutional investors only. The purpose of this report is to provide information on Mobius Life's own products and services and nothing in this presentation, or any supporting material, should be regarded as a personal recommendation. This report is not intended for onward transmission.

The value of investments, and the income from them, may go down as well as up and investors may not get back the amount originally invested. Where an investment is denominated in a currency other than sterling, changes in exchange rates between currencies may cause investment values or income to rise or fall. Past performance should not be seen as a reliable indicator of future results. Any past performance quoted is based on dealing valuations.

Within a fund, the asset allocations and choice of asset managers are at the discretion of Mobius Life and may change without notification to the investor.

Where a fund is invested with another Life Company by means of a reinsurance arrangement, Mobius Life monitors the way the reinsurer manages its business, but does not guarantee the solvency of the reinsurer, so the risk of default by the reinsurer is borne by policyholders who invest in the relevant fund(s).

A Liability Driven Investment (LDI) is a specialist fund that uses sophisticated techniques to meet its objective. An LDI fund may invest in a range of assets such as derivatives, swaps and bonds which individually may have a high degree of risk, be difficult to sell in stressed markets and/or be unregulated by the Financial Conduct Authority. Leverage is used as part of the management of an LDI fund, this can increase the overall volatility of the fund and any events that adversely affect the value of an investment would be magnified to the extent that leverage is employed.

All information is sourced to Mobius Life unless otherwise stated.

Mobius Life Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Mobius Life Administration Services is not authorised or regulated.

Mobius Life Limited (Registered No. 3104978) and Mobius Life Administration Services (Registered No. 5754821) are registered in England and Wales at: 3rd Floor, 20 Gresham Street, London EC2V 7JE.

