

The Russell Hobbs Pension and Life Assurance Plan - IS0008355

ESG REPORT – 05-Apr-2023



Summary

Scheme: The Russell Hobbs Pension and Life Assurance Plan - IS0008355

Statement Date: 05-Apr-2023

Fund	Value (£)	% Holding
Insight LDI Enhanced Selection Longer Real Fund	1,670,476.25	5.33%
Ninety One Global Total Return Credit	1,606,925.01	5.12%
CT LDI Nominal Dynamic LDI Fund	3,795,869.13	12.11%
L&G Life AF Over 15 Years Gilt Index Fund	4,096,242.25	13.06%
M&G Total Return Credit Investment Fund	1,883,538.13	6.01%
Barings European Loan Fund	1,600,413.39	5.10%
TwentyFour Absolute Return Credit Fund	6,407,513.61	20.43%
Insight LDI Enhanced Selection Shorter Real Fund	2,172,112.93	6.93%
Payden Absolute Return Bond Fund	6,688,132.21	21.33%
Insight LDI Enhanced Selection Longer Nominal Fund	1,435,594.80	4.58%

Fund	Fund Manager ESG Credentials	Fund ESG Credentials	
	Data Provided by FM as at	% Qs answered	Data Provided by FM as at
Insight LDI Enhanced Selection Shorter Real Fund	31/03/2023	97	31/03/2023
Insight LDI Enhanced Selection Longer Nominal Fund	31/03/2023	97	31/03/2023
M&G Total Return Credit Investment Fund	31/03/2023	83	31/03/2023
L&G Life AF Over 15 Years Gilt Index Fund	31/03/2023	97	31/03/2023
Insight LDI Enhanced Selection Longer Real Fund	31/03/2023	97	31/03/2023
Ninety One Global Total Return Credit	31/03/2023	87	31/03/2023
CT LDI Nominal Dynamic LDI Fund	31/03/2023	88	31/03/2023
Barings European Loan Fund	31/03/2023	99	31/03/2023
TwentyFour Absolute Return Credit Fund	31/03/2023	100	31/03/2023
Payden Absolute Return Bond Fund	31/03/2023	99	31/03/2023

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.

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

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

Fund Manager Business Response

Questions	Insight Investment		
			revised submission. We provided the FRC with an updated submission which we are confident addresses all the areas that were highlighted as inadequate by the FRC. We expect a response from FRC in due course.

Questions	M&G Investments		
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 plc'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>	Are Senior Management accountable for ESG or Climate Change risks?	<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>	Do you have a dedicated team that considers ESG and Climate Change related factors?	<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 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.</p>
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:	Do you rely on any third parties to provide ESG and Climate Change related analysis/research?	<p>Yes</p> <p>Yes, MSCI, ISS, Eikon & RepRisk</p>

Fund Manager Business Response

Questions	M&G Investments		
	Transparency Report		
Do you have a Climate Change policy that is integrated into the investment process?	<p>Yes</p> <p>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:</p> <ol style="list-style-type: none"> 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	<p>Yes</p> <p>Yes, we have proprietary ESG scorecards to capture our ESG analysis.</p>
Does your company have a policy on equality and diversity in the workplace?	<p>Yes</p> <p>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.</p>	Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?	<p>Yes</p> <p>Yes, we publish firm-wide periodic reports and we also publish fund-related information on our website such as Fund 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 annual sustainability report and stewardship report: M&G plc Sustainability Report 2022/23 (mandg.com) https://www.mandg.com/~media/Files/M/MandG-Plc/documents/responsible-investing/stewardship/mg-investments-annual-stewardship-report-2022.pdf</p>
Do ESG related factors get considered with respect to performance management of investment companies and funds?	<p>Yes</p> <p>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 returns for our clients, taking into account all factors that influence investment performance. Consequently, ESG issues are integrated into investment 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</p>	Are you signatories of the FRC UK Stewardship Code or equivalent?	<p>Yes</p> <p>The UK Stewardship Code 2020 sets high stewardship standards for both asset owners and asset managers. We were among the first tranche of signatories to the new 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 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>

Fund Manager Business Response

Questions	M&G Investments		
	use within the investment decision-making and portfolio construction processes.		

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</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>

Questions	Legal and General (LGIM)		
	engagement and stewardship processes and are proud to have been nominated by industry bodies like the ICGN, ICSCA 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.		
Please provide your UNPRI survey scores		Do you rely on any third parties to provide ESG and Climate Change related analysis/research?	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 sell-side broker reports.
Do you have a Climate Change policy that is integrated into the investment process?	Yes 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.	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?	Yes 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.	Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?	Yes Quarterly
Do ESG related factors get considered with respect to performance management of investment companies and funds?	Yes 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	Are you signatories of the FRC UK Stewardship Code or equivalent?	Yes 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.

Fund Manager Business Response

Questions	Legal and General (LGIM)		
	<p>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-larger amounts of capital.</p>		

Questions	Ninety One		
Do you have an ESG policy that is integrated into the investment process?	<p>Yes</p> <p>Our commitment and approach to stewardship is underpinned by our robust Stewardship Policy and Proxy voting guidelines. Ninety One applies its stewardship approach and principles across all the asset classes in which it invests, tailoring its stewardship efforts at the different stages of the investment cycle, depending on the opportunities and constraints of each asset class and the particular nature of the investment strategy.</p> <p>As an asset manager, Ninety One has carefully considered all global principles and we focus on the following core principles to guide our stewardship role in representing our client's ownership rights.</p> <p>Ninety One will support a long-term investment perspective by integrating, engaging, escalating and monitoring material ESG issues. Ninety One will exercise its ownership rights responsibly including engagement and voting rights. Ninety One will address internal governance of effective stewardship including conflicts of interest and potential obstacles. Ninety One will disclose how it discharges its stewardship duties through publicly available policies and reporting. Ninety One is, where appropriate, willing to act alongside other investors.</p> <p>Each investment team are responsible for managing their exposure to sustainability risks and opportunities within the</p>	Are Senior Management accountable for ESG or Climate Change risks?	<p>Yes</p> <p>Ninety One's management team is responsible for developing and implementing business strategy, under the direction of the Chief Executive Officer (CEO). This will include assessing and mitigating Ninety One's exposure to ESG and climate risks. One of Ninety One's strategic objectives is to ensure that sustainability is at the core of the business. Progress is reviewed against objectives identified by the Board under the firm's Invest, Advocate, Inhabit sustainability framework. Responsible objectives are formally set at the executive level annually with clear Key Performance Indicators (KPIs) for our Chief Executive Officer, Hendrik Du Toit.</p>

Questions	Ninety One		
	portfolios they manage. Investment capabilities have developed and continue to develop high-quality integration approaches to identify and value sustainability risks. 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.		
Do you have a firm ESG rating?	<p>Ninety One has been a signatory to the PRI since 2008. As a signatory, it is mandatory to report annually on our responsible investment practices through the PRI Transparency report.</p> <p>Our latest PRI scores from the assessment report are shown in the table below and the full report is available on our website at this link.</p> <p>PRI Assessment Module 2021 Investment & Stewardship Policy 4 stars Listed Equity - Incorporation 4 stars Listed Equity - Voting 4 stars Fixed Income - SSA 5 stars Fixed Income - Corporate 5 stars Infrastructure 5 stars</p> <p>Source: PRI Assessment report.</p> <p>Past performance is not a guide to future performance.</p> <p>We are pleased that our commitment to responsible investing and our continual efforts in deepening our integration processes have been reflected by our scores.</p> <p>The PRI Assessment scores are based on our response within the PRI Transparency report, which is available via the following link: https://ninetyone.com/-/media/documents/stewardship/91-pri-public-transparency-report-en.pdf</p> <p>Please see the following link which provides further information around the scoring methodology: https://www.unpri.org/signatories/about-pri-assessment/3066.article</p>	Do you have a dedicated team that considers ESG and Climate Change related factors?	<p>Yes</p> <p>ESG knowledge and expertise is held across a number of areas of the business.</p> <p>Ultimately, the investment teams have responsibility for managing sustainability risks and opportunities within their investment process through their integration frameworks. We place a big emphasis on ensuring that the investment teams have the appropriate knowledge, insights, data and tools so that the expertise is a truly integrated part of the investment process.</p> <p>The investment teams are supported by dedicated ESG specialists across our Sustainability team and Investment Risk team. We also have further expertise that we can draw upon from the portfolio managers managing our dedicated sustainability strategies and other sustainability specialists that are dedicated individual investment teams.</p> <p>The Sustainability Committee oversees the wider sustainability ecosystem in the business. Ninety One's firm-wide sustainability initiatives are overseen by the Chief Sustainability Officer, Nazmeera Moola. This includes investment integration, advocacy, corporate transition to net zero and developing and implementing efforts to mobilise dedicated funding for an inclusive net zero transition.</p>

Fund Manager Business Response

Questions	Ninety One		
Please provide your UNPRI survey scores	<p>2021 scores:</p> <ul style="list-style-type: none"> Investment & Stewardship Policy - 4 stars Listed Equity - Incorporation - 4 stars Listed Equity - Voting - 4 stars Fixed Income - SSA - 5 stars Fixed Income - Corporate - 5 stars Infrastructure - 5 stars 	Do you rely on any third parties to provide ESG and Climate Change related analysis/research?	<p>Yes</p> <p>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. 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. 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>Our climate change statement sits within our sustainability policy. 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. 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. We wholeheartedly support the objectives of the Paris 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. 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. In general, as an asset manager we will: 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. 	Do you create your own ESG or Climate Change related scores	<p>No</p> <p>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>
Does your company have a policy on equality and diversity in the	Yes	Do you provide any reporting publicly or to clients with regard to ESG and	Yes

Questions	Ninety One		
workplace?	<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 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. 	Climate Change related issues? How often?	<p>Transparent reporting and communication with clients and stakeholders 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-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> <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-tcf-report-2021-en.pdf</p> <p>Online voting disclosure</p> <p>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</p> <p>Annual Impact Reports</p> <p>With regard to our sustainability-focused products, our Annual</p>

Questions	Ninety One
	<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> <p>1. Commitment and accountability of our senior leadership team.</p> <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. 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</p> <p>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 for examples:</p> <p>Global Environment Impact Report: https://ninetyone.com/-/media/documents/impact-report/91-global-environment-impact-report-2022-en.pdf</p> <p>UK Sustainable Equity Impact Report: https://ninetyone.com/-/media/documents/sustainability-report/91-uk-sustainable-equity-fund-sustainability-report-en.pdf</p> <p>Quarterly Sustainability Reports</p> <p>For our non sustainability-focused products, 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.</p> <p>Other sustainability disclosures</p> <p>We publish various sustainability disclosures on our website as per regulatory requirements i.e. SFDR disclosures.</p>

Questions	Ninety One		
	<p>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> <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>		
<p>Do ESG related factors get considered with respect to performance management of investment companies and funds?</p>	<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>	<p>Are you signatories of the FRC UK Stewardship Code or equivalent?</p>	<p>Yes</p> <p>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>

Fund Manager Business Response

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

Fund Manager Business Response

Questions	Barings		
Do you have an ESG policy that is integrated into the investment process?	<p>Yes</p> <p>Barings has adopted a firmwide ESG framework and Sustainability Policy which applies across all of our asset classes. As we invest in multiple asset classes, and appropriate approaches to and degrees of integration may differ, we give our various asset class teams the flexibility to choose how they integrate ESG into their investment process. This is supplemented with general top-down guidance.</p>	Are Senior Management accountable for ESG or Climate Change risks?	<p>Yes</p> <p>Barings maintains a Board of Managers responsible for corporate governance, which is made up of Barings employees or employees of affiliated entities. In conjunction with Barings' leadership team, they are regularly updated on sustainability and ESG concerns. Barings' Director of Sustainability reports directly to Barings' President. Barings has established a robust corporate governance structure including various committees such as a Governance Committee, Products and Services Committee, Trading Practices and Counterparty Risk Committee, Pricing Committee, and Risk Committees whose mandates and charters include conflict identification and resolution. Barings investment professionals are responsible for incorporating ESG factors into their investment processes. The Investment Committees or other governing bodies for the individual asset classes provide oversight for this. Once invested, our investment professionals continue to monitor each issuer to ensure that our thesis remains intact and that an investment's risk and return profile remains attractive relative to other opportunities available in the market. Barings' Sustainability Committee meets regularly, attended by stakeholders from across the investment teams and business units, to share best practices and ideas for improvements. This committee is chaired by our Director of Sustainability and comprises senior business leaders. The Sustainability Committee is also supported by Sustainability Working Groups focused on long-term, strategic projects, made up of internal ESG champions. These groups supported our Sustainability Policy updates, led by the Sustainability team, in March 2020 and March 2021. Please refer to Question 1.12 for further insight into Barings' internal ESG oversight structure.</p>
Do you have a firm ESG rating?	<p>Reflecting our commitment to responsible investing, Barings LLC (Barings) has been a signatory to the Principles for Responsible Investment (PRI) initiative since January 2014. Our parent company Massachusetts Mutual Life Insurance Company has been a signatory of the PRI since February 2021. Barings, and its subsidiaries, have worked continuously to improve our responsible investment practices, and we are proud of our progress. Through its reporting and assessment process, the PRI policy requires accountability and transparency on the part of its signatories. We report to the PRI's Reporting framework on an annual basis on the development and implementation of our ESG integration and stewardship activities. We use this framework as the primary external benchmark to measure our progress on incorporating ESG information and stewardship into our investment processes and throughout our business. Scores and feedback from the PRI are used to inform and improve our responsible investment processes and Sustainability Policy (which includes our Stewardship Policy), which is reviewed and approved annually by our Sustainability Committee. Management utilises the Assessment Report scores in identifying the areas in which we are successfully outperforming our peers in terms of sustainable investment incorporation, as well as potential areas for improvement. As the PRI framework evolves, Barings will continue to adapt and update our policies and processes. A summary of our latest PRI scores has been provided in Question 1.5.</p>	Do you have a dedicated team that considers ESG and Climate Change related factors?	<p>Yes</p> <p>Barings has a dedicated Sustainability Team that is responsible for developing the firm's sustainability and ESG strategy, policies and partnerships—focusing on ESG integration, stewardship, and corporate responsibility. The team are supported in the delivery of the sustainability strategy by dedicated professionals in the Portfolio Solutions & Analytics Team, who support investment teams with their ESG integration as well as providing ESG research, analysis and reporting. All sustainability-dedicated professionals are tasked with helping to integrate ESG consistently across asset classes, manage commitments to industry organisations, educate colleagues on best practices, and contribute to internal sustainability initiatives. There are currently 11 professionals dedicated to sustainability at a firm level, and 20+ ESG-related resources embedded with investment teams across asset classes, as of 31 March 2023. However, as previously noted, Barings' investment professionals are ultimately responsible for incorporating ESG factors into their investment processes. The Investment Committees or other governing bodies for the individual asset classes provide oversight for this. Once invested, investment professionals continue to monitor each entity to ensure that our thesis remains intact and that an investment's risk and return profile remains attractive relative to other opportunities available in the market. Barings also uses the following internal resources in the delivery of our Sustainability and ESG initiatives: Governance Oversight The Barings Board and leadership team are regularly updated on sustainability and ESG concerns. Barings' Head of Sustainability and ESG reports directly to Barings' President. Sustainability Committee A formal committee tasked with supporting sustainability strategy execution across work streams, making recommendations to senior management, and providing governance and resources. Sustainability Working Groups Our six sustainability-focused working groups consist of representatives from across the business and focus on delivering long-term sustainability projects. This cross-business collaboration improves communication and consistency, enabling stakeholders from across the business to support our constant evolution. Our ESG Investment Integration working group consists of representatives from each asset class alongside our dedicated sustainability professionals to share best practices,</p>

Questions	Barings		
			enhance our processes and policies, and continually develop systems and tools for investment professionals to integrate ESG factors across the investment process. This shared forum enables consistency, where possible, across systems, tools, data and other resources and provides insight into necessary nuances between asset classes, where teams are able to learn from one another. Global High Yield Investment Group (the Group) Barings Global High Yield Investment Group is supported by two dedicated High Yield ESG resources, Gareth Hall and Adam Schauer, who help to facilitate ESG integration. This involves working closely with our Sustainability Team and representatives from other teams across Barings that participate in our Sustainability Working Groups and Sustainability Committee. Although the Group has dedicated ESG resources, all research analysts within the group are responsible for conducting ESG analysis.
Please provide your UNPRI survey scores	A summary of Barings' latest PRI Assessment scores has been provided below. Module Sub-Module Barings' Star Score (1-5) Barings' Score (0-100) Signatory Median Score Investment & Stewardship Policy - 4 82 60 Fixed Income SSA 4 79 50 Corporate 5 99 62 Securitised 4 89 55 Private Debt 4 83 67 Real Estate - 4 80 69 Listed Equity Incorporation 5 93 71 Voting 4 83 54 Source: PRI/Barings, 2021 (based on FY 2020). Barings exited quantitative equities in 2020, and for most of the year the strategy was in wind down. Barings chose not to incorporate ESG factors into the investment process or make other fundamental changes during the period of wind down, when the orderly transition and return of client funds was given priority. As such, the Listed Equity: Active Quantitative Voting score was 83/100 and 4 stars and Incorporation score was 0/100. Please refer to the following links for our latest PRI Assessment and Transparency reports: Assessment Report Transparency Report	Do you rely on any third parties to provide ESG and Climate Change related analysis/research?	No In addition to rigorous in-house work done by Barings research analysts and portfolio managers to evaluate ESG risks, our team also has access to third-party resources that provide institutional investors with issuer-specific ESG data and research such as MSCI and Sustainalytics. Additionally, our analysts have been trained to use Bloomberg's ESG functionality, which aggregates ESG data from leading sustainable research providers as well as filters for company-specific ESG news. Bloomberg's ESG functionality also provides issuer and sector ESG analysis alongside Bloomberg's research intelligence unit, featuring daily analysis on factors that drive long-term value and performance. Although we subscribe to third-party providers' ratings and support materials, and reference their findings in our analysis, they lack depth so we do not solely rely on them. The lower level of ESG data provision by issuers in the high yield and leveraged loan markets means we are heavily reliant on our internal ESG due diligence. We believe that the long-term knowledge of portfolio companies and sectors, as well as access to management and financial sponsors, provides a superior level of analysis and a more robust methodology.
Do you have a Climate Change policy that is integrated into the investment process?	Yes Barings' Climate Change Policy is outlined on page 15 of Attachment 1 - Barings' Global Sustainability Policy. A brief overview of how we assess climate impacts, risks, and opportunities, has been provided below. We consider environmental and climate risks as part of the incorporation of ESG factors in our fundamental analysis. We supplement our rigorous investment and decision-making processes with third-party systems. These systems include data on carbon usage and other issuer-specific environmental risks and opportunities. Moreover, as stated within our climate change policy, Barings wants to protect its clients from any emerging risks. In assessing the risks to our business, as well as the opportunities from working to help mitigate this temperature rise, we make efforts to analyse parameters of potential impact. This should help us to protect our clients, communities, and the world from adverse impacts through taking actions to avoid the physical, regulatory, and transition risks of climate change, and capitalising on the investment potential of a future net zero carbon world. As signatories to the UN's PRI, we support the PRI's ambition to keep the global temperature increase below 1.5 degrees Celsius by the end of this century in order to prevent widespread adverse consequences.	Do you create your own ESG or Climate Change related scores	Yes We integrate ESG analysis into our investment process across all asset classes, including assigning qualitative and/or quantitative ratings for specific asset classes. These ratings are intended to capture both the current ESG profile of an investment, as well as the trajectory going forward. More specifically to Barings' Global High Yield Investment Platform, for every investment, an ESG review is included in the investment paper. The analyst will also conduct proprietary research drawing on: third-party data sources, company CSR policies, audited accounts (checking for audit qualifications, off balance sheet liabilities, aggressive accounting policies), due diligence provided as part of the transaction, and discussions with company management teams. All such analysis then ultimately feeds into the analysts' view of the credit, and allows us to conduct the broadest possible analysis of each underlying credit. We calculate a proprietary Barings Credit Grade that allows us to give all companies held in any portfolio, an internal quantitative rating. An ESG score between 1 (Excellent) to 5 (Unfavourable) is assigned in our credit analysis and portfolio management system to the issuers that captures both the current ESG performance relative to peers as well as the outlook, which rates the momentum of the entity's ESG efforts. These ratings are then weighted by sector to get an overall ESG rating for each company. A credit grade is produced by analysts scoring a company on five credit fundamental areas on an alphabetical scale (i.e., BB, B, CCC). This is then adjusted based on the ESG rating of the company. The overall credit grades feed into our portfolio management system and relative value analysis materials. This allows portfolio managers to see the best and worst contributors to the portfolio and make relative value active management decisions including ESG factors, e.g., reduce exposure to investments with poor ESG ratings. The analyst teams use the credit grade

Questions	Barings		
			process to highlight ESG-linked relative value recommendations that are incorporated into weekly relative value meetings.
Does your company have a policy on equality and diversity in the workplace?	<p>Yes</p> <p>At Barings, we know cultivating and maintaining pipelines for diverse talent will lead to more diversity at our firm, as well as in the industry at large. As such, we have a number of practices to help hire and promote diverse talent. When beginning a candidate search, Barings' talent acquisition team holds a kick-off meeting to help identify the objective criteria that will make an individual successful in the open role. The recruiter and acquisition team then works to assemble a diverse candidate slate for every open position, partnering with external organisations to ensure access to diverse talent as a supplement to our internal sourcing efforts. Next, the recruiter will utilise a blind resume process to help hiring managers determine which candidates should receive an opportunity to interview for the position. Additionally, we offer voluntary micro-learnings about inclusive hiring for all hiring team members. Moreover, Barings partners with a number of organisations to expose individuals from historically underrepresented communities to opportunities in financial services and at Barings. Please refer to Attachment 2 for a copy of Barings' Global Statement on Diversity, for further information. Additionally, Barings maintains a written policy of equal employment opportunity and practices it, as well. In summary, all decisions regarding recruitment, selection, placement, salary administration, training, promotion, transfer, discipline, and termination, are based on qualifications and business needs, and not on the basis of race, colour, religion, age, sex, marital status, sexual orientation, gender identity, nationality, citizenship, veteran status, or disability. All other company benefits and conditions of employment will be administered without discrimination in conformance with existing law.</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>Barings' Global High Yield Investment Platform For the majority of Barings' fixed income funds, we produce a quarterly ESG report. This report includes the top 10 holdings of the Fund with the relevant Barings ESG score and weight of the fund with positive or improving ESG profile. In addition, the report also provides fund carbon emissions data and summarises the engagements across the Fixed Income platform. For copies of the latest reports for each of the Funds, please refer to Attachment 3 - Barings European Loan Fund ESG Report, and Attachment 4 - Barings Global High Yield Credit Strategies Fund ESG Report. Separately, we produce an annual Global High Yield ESG Report, which includes examples of deals that have been declined due to ESG concerns, and examples of engagements with portfolio companies where we have had material concerns on ESG issues. Please refer to Attachment 5 for the latest copy. We are always looking to develop our approach to ESG as this is a constantly evolving field in terms of best practice standards and data availability, and we will be continuing to look to improve our ESG related reporting and transparency to investors over time. Firm Level At firm level, we continue to focus on providing transparency to our clients and other stakeholders with regard to our ESG and sustainability practices. We regularly publish key information on our website for all stakeholders, including sustainability policies, engagement records, proxy voting records, and firm-level reports such as our UK Stewardship report, UN Global Compact report, PRI Assessment and Transparency reports, and Sustainability report which have been included in the links below. As previously mentioned, reflecting our commitment to responsible investing, Barings has been a signatory to the United Nations' (UN) Principles for Responsible Investment (PRI) initiative since January 2014. Our parent company Massachusetts Mutual Life Insurance Company has been a signatory of the PRI since February 2021. Through its reporting and assessment process, the PRI policy requires accountability and transparency on the part of its signatories. Barings reports to the PRI Transparency Reporting framework on an annual basis. This annual report provides detailed information on the firm's ESG processes and initiatives. We use the report as our primary external benchmark to measure our progress in incorporating ESG factors into our investment processes. The PRI provides an Assessment Report of our Transparency Report, typically three months after our initial submission. This assessment breaks down each portion of the framework we have reported on, and grades our reporting relative to our peers. Management uses these Assessment Report scores to determine areas where we are successfully outperforming our peers in terms of sustainable investment incorporation, as well as potential areas for improvement. Additionally, we are public supporters of the Task Force on Climate-Related Financial Disclosures (TCFD) and are working towards implementing their recommendations (e.g., metrics, targets, governance, strategy, risk management practices) as well as enhanced reporting. In 2020, we provided private TCFD disclosures in our PRI reporting as per our signatory requirements, but we are also working toward providing the disclosures suggested by the TCFD. We also submit an annual Communication on Progress to the UN Global Compact. Lastly, we published our first annual Sustainability Report in June 2022, outlining initiatives and progress across three key areas; Corporate Responsibility, Stewardship, and ESG Investment Integration. The report features case studies and highlights achievements across a number of fronts - from Employee Resource Groups, to investment process improvements, and operational carbon footprint reduction efforts.</p>
Do ESG related factors get considered with respect to performance management of investment companies	<p>No</p> <p>We do not currently quantify the results of our ESG analysis at</p>	Are you signatories of the FRC UK Stewardship Code or equivalent?	<p>Yes</p> <p>We are pleased to confirm that Barings is a signatory to the UK Stewardship Code.</p>



Fund Manager Business Response

Questions	Barings		
and funds?	the portfolio level, but there are ongoing projects to improve our reporting process. It is our belief that over time, the trading performance of credits with higher ESG related risks may be negatively impacted. That said, we believe that it is important for the investment community to be actively involved in supporting companies following more sustainable practices. Ultimately, our performance will be evaluated based on our total return, but we believe that ESG integration will have a positive impact. As described previously, ESG considerations are incorporated in our underwriting process and internal credit grade. We would expect credits with higher exposure to ESG risks to provide a higher level of compensation to investors for those additional risks and factor that into our decision making when determining whether we are comfortable with investing the credit in general as well as the relative value proposition based on current trading levels and these risks.		Our latest stewardship report can be found here. We continue to take steps to strengthen and improve our stewardship practices. Further information on our Stewardship approach can be found on our website.

Questions	TwentyFour Asset Management		
Do you have an ESG policy that is integrated into the investment process?	<p>Yes</p> <p>At TwentyFour, we believe that ESG considerations can have a positive influence on the value of our investments. As such, we have a formal ESG integration framework which incorporates all ESG factors into our investment process. As fixed income investors our first priority is to ensure we are paid coupons and principal, and we see ESG as a risk to this goal like any other. While TwentyFour's approach to risk has always been concurrent with ESG principles, we have now formalised this by integrating a robust firmwide ESG Integration framework throughout our investment process, with portfolio managers directly responsible for the analysis. We consider integration to be the right choice for our Firm, and while it differs from other approaches to ESG within asset management, we believe its application can result in better outcomes for our clients.</p> <p>Our Firm-wide ESG integration framework ensures ESG risks are factored into every investment decision our Portfolio Managers make, across every one of the Firm's strategies. This is supplemented through the utilisation of the ESG module within our proprietary Observatory system where we have developed a robust ESG scoring system with scores sourced from the Asset4's ESG database from Refinitiv and the portfolio managers themselves (please see below on how we score companies for maximum effectiveness). Our dynamic scoring through Observatory can allow us to positively grade a company's score through our momentum and controversies principle ahead of the more static scoring provided by ESG data providers. This provides the portfolio management team with a real-time view on the actual ESG risk contained within a</p>	Are Senior Management accountable for ESG or Climate Change risks?	<p>Yes</p> <p>Our ESG Committee is run by founding partner and Chairman, Graeme Anderson.</p>

Questions	TwentyFour Asset Management
	<p>security.</p> <p>Whilst our system enables the portfolio management team to develop a true understanding of positive or negative changes and facilitates the assessment of individual bonds on a relative value basis given ESG factors, it does not solely dictate buy or sell recommendations – it is purely a part of the overall assessment on the validity of an investment decision. Our integration approach states that ESG factors are considered in all investment decisions but we are not prohibited from an investment due to ESG reasons; rather we would expect to be appropriately compensated in yield for the additional risks.</p> <p>Within this integration framework, we place a high significance on engagement. Engagement is an investor's willingness to actively interact with companies, regulators or government bodies on behalf of their clients. We engage with all existing and potential issuers when we feel it is necessary and appropriate. We measure the success of engagements by formally recording what we want the outcome of any engagement to be prior to engaging, then comparing that to the actual outcome after engagement.</p> <p>In addition to this, we also place high significance on the incorporation of controversies and momentum. Momentum is actively monitored within our framework. In our opinion 'momentum' is probably the most underestimated and overlooked concept in the world of ESG investing. Momentum is an assessment of a company's plan and demonstrable execution towards improving its ESG credentials. Sometimes this will be a general focus on improving all aspects of ESG, and will be reported in the CSR, with measurable targets being preferable. We actively monitor controversies when analysing ESG performance. Controversies are visible signals and can be an important risk indicator. For instance, an oil exploration and production company experiencing a major oil leak owing to poor maintenance would likely create negative consequences such as litigation or regulation. We believe that controversies indicate the risk management and ethical practices of a company.</p> <p>Given our ESG Integration framework, we also offer 'sustainable' labelled funds for investors who wish to go further. We define 'sustainable' funds as focusing on both the sustainability of the investment and ensuring that the investment is not detrimental to the broader ecosystem that it occupies. For many investors, such funds can allow them to reflect their ethical and societal values. These funds makes use of an ESG overlay through applying a positive and negative screen within the portfolio construction process. The positive screen ensures that issuers meet the minimum threshold ESG score within our proprietary scoring system, meaning companies are purposely rewarded for doing the right things based on our ESG practices. In addition to this, the</p>

Questions	TwentyFour Asset Management		
	negative screen systematically excludes companies with material production in certain sectors such as alcohol, tobacco, gambling, and many more. Our research has shown that this careful mix of positive and negative screens, which we have tailored to the specific challenges of sustainable investing in fixed income, enables us to optimise the funds risk adjusted returns.		
Do you have a firm ESG rating?	<p>ESG Rating Comments</p> <p>We do not have a firm ESG rating as of yet.</p>	Do you have a dedicated team that considers ESG and Climate Change related factors?	<p>No</p> <p>We do not outsource Stewardship and RI to a separate team; instead they are fully integrated and analysis is the responsibility of all Portfolio Managers. We believe that every member of the investment team is required to 'own' the process and do not believe that sub-contracting out RI to an individual (or separate team) can be truly effective in an integrated investment process.</p> <p>In order to further develop our ESG process, we have created an ESG Committee.</p> <p>The Committee which implements our ESG process, comprises of sixteen professionals in the Firm (including six Partners) and is headed up by Graeme Anderson (ExCo Chairman). The Group is made up of senior members of each business division within the Firm to ensure fair representation and uptake of the initiatives proposed and ultimately implemented. The Group reports to the Firm's Executive Committee on a monthly basis.</p> <p>The ESG Committee is responsible for integrating ESG across the business. Our ESG Policy, both at a Firm and Investment level, is governed by TwentyFour's Executive Committee, who request monthly updates on the progress.</p> <p>Members of the ESG Committee:</p> <p>Graeme Anderson (Partner / PM / ExCo Chairman) Chris Bowie (Partner / PM) Nick Knight-Evans (Partner / COO) Alistair Wilson (Partner / Head of Institutional Business) Sujan Nadarajah (Partner / Chief Compliance Officer) Helen Howell (Deputy COO) Nicholas Towell (Risk) Chloe Doyle (Head of Marketing) David Norris (Partner, Head of US Credit) Sophia Papi (Business Development – Wholesale) Nicola Pearson (Business Development – Institutional) Gordon Shannon (Partner / PM) Elena Rinaldi (Portfolio Assistant) Charlene Malik (Portfolio Assistant) Johnathan Owen (Portfolio Assistant) Shannon Love (Product Analyst)</p> <p>Further, our TwentyFour Corporate Social Responsibilities group meets to ratify ESG Integration or Sustainable investment policy decisions as well as any matters of interest generated from the Steering Group. This group is also chaired by Graeme Anderson (ExCo Chairman).</p> <p>TwentyFour hosts regular RI/ESG lunch and learns which are attended by the whole company.</p>

Questions	TwentyFour Asset Management		
			<p>We believe that in order to be truly effective the PMs must be responsible for the implementation of our RI process and thus by definition understanding is a necessity. As such we educate and develop this knowledge in a number of ways. Firstly we have conducted multiple training sessions as part of our lunch and Learn, education seminars. We have also enlisted ESG 'champions' in each strategy who take on extra duties to ensure adherence and real-time training. Finally, the inclusion of our integration methodology within our Observatory portfolio management system facilitates the process into the daily task of portfolio management and full training on the ESG elements of this system has been provided to all members of the investment team.</p>
Please provide your UNPRI survey scores	<p>In regards to the UNPRI, TwentyFour became a signatory as of 26th February 2020. The UNPRI are having difficulty due to the increased number of submissions. As such, they have requested that we submit our first report to be scored in Spring 2023 rather than Spring of this year which we were expecting to do. When we receive our scores depends on how quick the UNPRI are able to assess our responses – we envisage autumn 2023.</p>	Do you rely on any third parties to provide ESG and Climate Change related analysis/research?	<p>Yes</p> <ul style="list-style-type: none"> - Asset4 - MSCI
Do you have a Climate Change policy that is integrated into the investment process?	<p>Yes</p> <p>Please see 1.6</p>	Do you create your own ESG or Climate Change related scores	<p>Yes</p> <p>TwentyFour has purchased the Asset4 ESG database from Refinitiv. The database covers approximately two-thirds of the holdings within the Firm (excluding our ABS holdings) and the information gathered scores companies on a total of ten different parameters; Emissions, Resource Use, Innovation, Workforce, Human Rights, Community, Product Responsibility, Management Score, Shareholders Score, and CSR Strategy Score. This information goes directly into our Observatory database and supplements our own due diligence that also addresses ESG factors. Within the database, the Portfolio Managers are easily able to challenge and overwrite the score given by Refinitiv and reward companies with improving ESG metrics. For those holdings that do not have a score from Asset4, our Portfolio Managers will independently review the holdings and provide their own score. Our ABS team have created their own system based on the same metrics.</p> <p>Overview of our ESG Module in the Observatory system:</p> <p>The picture above (1) shows how the ESG scores from Asset4 are combined with, or overridden by the team's own assessment of the underlying company's ESG capabilities, garnered from our due diligence and engagement with the management. For each company, peer group sector scores are shown, breaking each score into lowest, highest, median, 3rd quartile and 1st quartile. This allows you to see instantly if this company is stacking up positively or badly against its peers. The light system (green = good, white = indifferent, red = bad) shows this visually.</p>

Fund Manager Business Response

Questions	TwentyFour Asset Management		
			<p>The next two pictures above (2 and 3) shows how the system shows the ratings (the company vs. peers and sector vs. other sectors). The peer group can be amended within the 'peers' tab.</p> <p>The final picture (4) shows how we record engagement within the system. We can detail this on bonds we own, have bought or decided not to buy based on ESG metrics. In addition to the score, we can also detail further information on specific ESG risks including current controversies and momentum (if the company is on an improving ESG trend).</p>
Does your company have a policy on equality and diversity in the workplace?	Yes N/A	Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?	Yes We can provide engagement and ESG reports for each business line upon request
Do ESG related factors get considered with respect to performance management of investment companies and funds?	Yes N/A	Are you signatories of the FRC UK Stewardship Code or equivalent?	Yes TwentyFour is signatory to the Financial Reporting Council (FRC) UK Stewardship code. Our latest report can be found here.

Questions	PAYDEN & RYDEL		
Do you have an ESG policy that is integrated into the investment process?	Yes N/A	Are Senior Management accountable for ESG or Climate Change risks?	Yes Please refer to the ESG Integration policy (available upon request).
Do you have a firm ESG rating?	N/A	Do you have a dedicated team that considers ESG and Climate Change related factors?	Yes Payden's integration of ESG considerations into its investment processes involves collaborative efforts by multiple groups. The Managing Committee, is the most senior governance committee, created the ESG Committee, selects its membership and determines its duties. The committee is comprised of members of our Research, Strategy and Client Portfolio Management teams and members of the Compliance Group. Please refer to the attached ESG Investment Integration Policy for more details. The ESG Committee acts as the center of excellence within the firm for the coordination of our ESG investment integration and for the dissemination of ESG-related information and best practices. This structure enables each team to integrate ESG factors into their process as applicable and in the context of their specific market expertise. Therefore, it is not our primary practice to have investment experts that spend 100% of their time on ESG. However, we do have individuals dedicated to coordinating analytics and ESG best practices across the organization: Laura Lake, CFA, Katy Smith and Rachel Nieland.
Please provide your UNPRI survey scores	4 stars	Do you rely on any third parties to provide ESG and Climate Change related	Yes We use both 3rd party and in-house resources to collect and integrate

Fund Manager Business Response

Questions				PAYDEN & RYGEL			
			analysis/research?				ESG, climate data and metrics. The following is a sample list of data providers: Metrics MSCI ESG Research Environmental, social and governance indicators for sovereign and corporate issuers. MSCI Climate Solutions Climate Value at Risk (VaR) and other climate related industry and security level indicators. MSCI Screening Business & product involvement screens along climate risk indicators in investment portfolios. MSCI Regulation EU Taxonomy and adverse impact metrics for SFDR regulation. risQ Analytics Physical risk and Value at Risk (VaR) indicators for local government and public enterprise issuers. Level 11 Physical risk and Value at Risk (VaR) indicators for securitized structures and issuers. CDP Subscription level greenhouse gas emissions dataset. Bloomberg New Energy Finance (BNEF) Full reference of Green, Social & Sustainability labelled bond issuance.
Do you have a Climate Change policy that is integrated into the investment process?	N/A		Do you create your own ESG or Climate Change related scores	Please refer to the ESG Integration policy (available upon request).		No	N/A
Does your company have a policy on equality and diversity in the workplace?	Yes		Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?	Our diversity & Inclusion statement is available on our website: https://www.payden.com/img/sliders/about/Payden%20D&I%20Mission%20Statement%207-2021.pdf		Yes	Payden & Rygel makes available to our clients MSCI ESG Research field level information which includes numerous ESG-related data fields on substantial portions of the fixed income universe. For example, we can report on environmental indicators such as carbon emissions and intensity, energy supply and generation mix, and resource use and intensity; governance factors like board size and independence, percentage of women on the board, female CEO or equivalent, percentage of independent directors, board average age, and climate transparency. In addition, we use MSCI data for social factors such as supply chain integrity, employee relations, adherence to international norms for human rights and labour practices, etc. Reporting frequency is tailored to client requirements.
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?	We evaluate numerous factors, including ESG, when evaluating the potential performance of a holding. Unless mandated by clients, ESG considerations do not take precedence over performance considerations. ESG factors are incorporated into the overall decision-making process and in context of the portfolio and markets. Just as the deterioration fundamental factor may lead to a positioning change, the deterioration of ESG characteristics may lead to altering positioning when taken in context of financial metrics and technical analysis.		Yes	Please find our latest UK Stewardship Code report here: https://www.frc.org.uk/getattachment/2d71d492-4049-438e-81e5-1414064c82f6/UKSC-2021-30th-April-2022-Payden-Rygel.pdf

Fund Manager Product Response

Activity	Insight LDI Enhanced Selection Shorter Real Fund		
Do you undertake Engagements for this fund?	Yes,	How many engagements have you had with companies in the past 12 months?	37
How many engagements were made regarding climate change?	22	How many engagements were made regarding board diversity?	
How many engagements were made regarding waste reduction?		How many engagements were made regarding financials?	102
How many engagements were made regarding other issues?	41	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 engagements and outcomes from the last 12 months.	<p>UBS - Counterparty engagement Topic: Governance - Board effectiveness - Other Rationale: We held a dedicated ESG meeting with Investor Relations, Business Strategy, Global Head of Funding to address UBS' weak governance scores in our Prime ESG ratings and understand how they are working to improve their performance. What have you done: UBS has experienced various governance-related controversies. We discussed these and asked about the controls in place to avoid a repeat of these in the future, and received a satisfactory response. For example, there was a complete overhaul on the controls framework in relation to tax. We also challenged them on their diversity performance, as only 25% of management are female. They have since released a target of 30%. Outcomes and next steps: We continue to engage regularly. We would like to see specific net zero target for the loan book (although UBS is tightening lending criteria, squeezing out any new coal and with nuclear highlighted as an area of concern).</p>		
Do you engage in voting for this fund?	No, LDI Fund	Do you conduct your own votes?	Not applicable for this fund
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 votes were proposed across the underlying companies in the fund?	

Page 27 of 63

Fund Manager Product Response

Activity	Insight LDI Enhanced Selection Shorter Real Fund		
company ahead of the vote?		of the vote?	
<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? 	No, 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? 	No, 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'? • 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? 	No, 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'? • 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? 	No, LDI Fund
<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 	No, LDI Fund	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	<p>Yes Rationale: As a response to this, Insight became a signatory of the Net Zero Asset Managers initiative in April 2021, where we have committed to reach net zero emissions by 2050 at the latest. To support our journey towards net zero, we will either actively engage with our highest emitters, or ensure they are on a net zero pathway. Therefore, we are developing bespoke strategies to engage with the highest emitters within our portfolio on climate-related issues, such as coal exposure and carbon intensity performance. We use our Net Zero Model to identify companies to engage with, as we look to ensure that at least 50% of financed emissions are either net zero, aligned to a net-zero pathway, aligning to a net-zero pathway or subject of engagement with a view to moving into alignment by net zero, by 2023. This target increases to cover 70% by of financed emissions by 2025. We</p>

Fund Manager Product Response

Activity	Insight LDI Enhanced Selection Shorter Real Fund		
company ahead of the vote?			identify objectives for engagement using tools such as the Net Zero Benchmark from Climate Action 100. Success will be measured on improvement across the criteria of our Net Zero model and will be assessed on a case-by-case basis.
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	

Activity	Insight LDI Enhanced Selection Longer Nominal Fund		
Do you undertake Engagements for this fund?	Yes,	How many engagements have you had with companies in the past 12 months?	37
How many engagements were made regarding climate change?	22	How many engagements were made regarding board diversity?	
How many engagements were made regarding waste reduction?		How many engagements were made regarding financials?	102
How many engagements were made regarding other issues?	41	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 engagements and outcomes from the last 12 months.	<p>UBS - Counterparty engagement Topic: Governance - Board effectiveness - Other Rationale: We held a dedicated ESG meeting with Investor Relations, Business Strategy, Global Head of Funding to address UBS' weak governance scores in our Prime ESG ratings and understand how they are working to improve their performance. What have you done: UBS has experienced various governance-related controversies. We discussed these and asked about the controls in place to avoid a repeat of these in the future, and received a satisfactory response. For example, there was a complete overhaul on the controls framework in relation to tax. We also challenged them on their diversity performance, as only 25% of management are female. They have since released a target of 30%. Outcomes and next steps: We continue to engage regularly. We would like to see specific net zero target for the loan book (although UBS is tightening lending criteria, squeezing out any new coal and with nuclear highlighted as an area of concern).</p>		
Do you engage in voting for this fund?	No, LDI Fund	Do you conduct your own votes?	Not applicable for this fund

Fund Manager Product Response

Activity	Insight LDI Enhanced Selection Longer Nominal Fund		
<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 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?	
How many votes did you abstain from?		<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? 	No, LDI Fund
<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>No, LDI Fund</p> <p>No</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? 	No, LDI Fund

Fund Manager Product Response

Activity				Insight LDI Enhanced Selection Longer Nominal Fund			
Do you have a vote you consider the fourth most significant for this fund?:		No, LDI Fund		Do you have a vote you consider the fifth most significant for this fund?:		No, LDI 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 Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 				<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? 			
Do you have a vote you consider the sixth most significant for this fund?:		No, LDI Fund		Do you have a vote you consider the seventh most significant for this fund?:		No, LDI 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 '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? 				<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? 			
Do you have a vote you consider the eighth most significant for this fund?:		No, LDI Fund		Do you have a vote you consider the ninth most significant for this fund?:		No, LDI 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 '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? 				<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? 			
Do you have a vote you consider the tenth most significant for this fund?:		No, LDI Fund		Do you monitor the carbon emission levels or similar of the underlying companies in the fund?		Yes Rationale: As a response to this, Insight became a signatory of the Net Zero Asset Managers initiative in April 2021, where we have committed to reach net zero emissions by 2050 at the latest. To support our journey towards net zero, we will either actively engage with our highest emitters, or ensure they are on a net zero pathway. Therefore, we are developing bespoke strategies to engage with the highest emitters within our portfolio on climate-related issues, such as	
<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'? 							

Fund Manager Product Response

Activity	Insight LDI Enhanced Selection Longer Nominal Fund		
<ul style="list-style-type: none"> 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? 			coal exposure and carbon intensity performance. We use our Net Zero Model to identify companies to engage with, as we look to ensure that at least 50% of financed emissions are either net zero, aligned to a net-zero pathway, aligning to a net-zero pathway or subject of engagement with a view to moving into alignment by net zero, by 2023. This target increases to cover 70% by of financed emissions by 2025. We identify objectives for engagement using tools such as the Net Zero Benchmark from Climate Action 100. Success will be measured on improvement across the criteria of our Net Zero model and will be assessed on a case-by-case basis.
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	

Activity	M&G Total Return Credit Investment Fund		
Do you undertake Engagements for this fund?	Yes,	How many engagements have you had with companies in the past 12 months?	3
How many engagements were made regarding climate change?		How many engagements were made regarding board diversity?	
How many engagements were made regarding waste reduction?		How many engagements were made regarding financials?	
How many engagements were made regarding other issues?	3	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 engagements and outcomes from the last 12 months.	<p>INFORMA PLC Engagement Objective: To ensure that there is appropriate succession planning for Informa, British publishing, business intelligence, and exhibitions group</p> <p>Action Taken: M&G met with the Chairman and Head of IR</p> <p>Engagement Outcome: The board have regular and formal discussions on succession planning for the CEO and executives. There are no current plans for the CEO leaving, he is expected to stay in the business for the foreseeable future. Informa don't specifically use an external head-hunter to search for potential talent, if the CEO were to leave on a planned or unplanned basis they would have someone step into the role in the interim and they have someone in mind for the moment. Then, from here they would specifically evaluate the situation to see whether they needed to recruit externally for the role. They have had good stability in the leadership team for long time and the company reassured us that the team is not likely to change in the short term and that they have controls and measures in place to replace him if necessary.</p>		

Fund Manager Product Response

Activity	M&G Total Return Credit Investment Fund		
Do you engage in voting for this fund?	No,	Do you conduct your own votes?	N/A
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 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?	
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• Outcome of the vote• Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A,
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• Outcome of the vote• Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, N/A	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• Outcome of the vote• Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A,

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 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? 			monitor and visualise climate data and enables them to track progress against relevant benchmarks. In 2022, the PAT was updated to reflect the latest climate science and bring the NZIF in line with relevant IIGCC guidelines. 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	L&G Life AF Over 15 Years Gilt Index Fund		
Do you undertake Engagements for this fund?	No,	How many engagements have you had with companies in the past 12 months?	
How many engagements were made regarding climate change?		How many engagements were made regarding board diversity?	
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 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, Gilts Index Fund	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
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?	

Fund Manager Product Response

Activity		L&G Life AF Over 15 Years Gilt Index Fund	
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?		<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? 	N/A, Gilts Fund
<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>N/A, Gilts 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 • Outcome of the vote • Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A, Gilts 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, Gilts 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, Gilts Fund

Fund Manager Product Response

Activity	L&G Life AF Over 15 Years Gilt Index Fund		
company ahead of the vote?		of the vote?	
<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, Gilts 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, Gilts 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? 	N/A, Gilts 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? 	N/A, Gilts Fund
<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 	N/A, Gilts Fund	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	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

Fund Manager Product Response

Activity	L&G Life AF Over 15 Years Gilt Index Fund		
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?	-0.11

Activity	Insight LDI Enhanced Selection Longer Real Fund		
Do you undertake Engagements for this fund?	Yes,	How many engagements have you had with companies in the past 12 months?	37
How many engagements were made regarding climate change?	22	How many engagements were made regarding board diversity?	
How many engagements were made regarding waste reduction?		How many engagements were made regarding financials?	102
How many engagements were made regarding other issues?	41	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 engagements and outcomes from the last 12 months.	<p>UBS - Counterparty engagement Topic: Governance - Board effectiveness - Other Rationale: We held a dedicated ESG meeting with Investor Relations, Business Strategy, Global Head of Funding to address UBS' weak governance scores in our Prime ESG ratings and understand how they are working to improve their performance. What have you done: UBS has experienced various governance-related controversies. We discussed these and asked about the controls in place to avoid a repeat of these in the future, and received a satisfactory response. For example, there was a complete overhaul on the controls framework in relation to tax. We also challenged them on their diversity performance, as only 25% of management are female. They have since released a target of 30%. Outcomes and next steps: We continue to engage regularly. We would like to see specific net zero target for the loan book (although UBS is tightening lending criteria, squeezing out any new coal and with nuclear highlighted as an area of concern).</p>		
Do you engage in voting for this fund?	No, LDI Fund	Do you conduct your own votes?	Not applicable for this fund

Fund Manager Product Response

Activity	Insight LDI Enhanced Selection Longer Real Fund		
<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 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?	
How many votes did you abstain from?		<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? 	No, LDI Fund
<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>No, LDI Fund</p> <p>No</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? 	No, LDI Fund

Activity		Insight LDI Enhanced Selection Longer Real 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? 	No, 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? 	No, 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? 	No, 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? 	No, 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'? 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? 	No, 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'? 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? 	No, LDI Fund
<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'? 	No, LDI Fund	<p>Do you monitor the carbon emission levels or similar of the underlying companies in the fund?</p>	<p>Yes Rationale: As a response to this, Insight became a signatory of the Net Zero Asset Managers initiative in April 2021, where we have committed to reach net zero emissions by 2050 at the latest. To support our journey towards net zero, we will either actively engage with our highest emitters, or ensure they are on a net zero pathway. Therefore, we are developing bespoke strategies to engage with the highest emitters within our portfolio on climate-related issues, such as</p>

Fund Manager Product Response

Activity	Insight LDI Enhanced Selection Longer Real Fund		
<ul style="list-style-type: none"> 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? 			coal exposure and carbon intensity performance. We use our Net Zero Model to identify companies to engage with, as we look to ensure that at least 50% of financed emissions are either net zero, aligned to a net-zero pathway, aligning to a net-zero pathway or subject of engagement with a view to moving into alignment by net zero, by 2023. This target increases to cover 70% by of financed emissions by 2025. We identify objectives for engagement using tools such as the Net Zero Benchmark from Climate Action 100. Success will be measured on improvement across the criteria of our Net Zero model and will be assessed on a case-by-case basis.
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	

Activity	Ninety One Global Total Return Credit		
Do you undertake Engagements for this fund?	Yes,	How many engagements have you had with companies in the past 12 months?	18
How many engagements were made regarding climate change?	8	How many engagements were made regarding board diversity?	
How many engagements were made regarding waste reduction?		How many engagements were made regarding financials?	25
How many engagements were made regarding other issues?	18	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 engagements and outcomes from the last 12 months.	<p>Company: LBBW Type of engagement: Environmental (predominantly) Sector: Financials Issue: ESG integration and disclosure Date: November 2022 Status: Monitoring</p> <p>Privately owned LBBW is one of Germany's largest Landesbanks and plays a key role in the State of Baden Wurttemberg as a financial services provider for large corporates, SMEs and the public sector. The group has significant exposure to higher emitting sectors, including manufacturing, autos, and the energy industry. We engaged with LBBW Investor Relations in the quarter after the recent publication of the updated emissions reduction targets for some of the subsectors within the lending portfolio. The purpose of this, and future engagements, is to support the bank transition to best in class sustainability disclosure practices, given they currently lag a number of their larger listed peers. We also wanted to get a better understanding of their planned disclosure of emission reduction targets for other sectors. The group has published interim targets for 2030 for four sectors, including energy producers, oil & gas</p>		

Fund Manager Product Response

Activity	Ninety One Global Total Return Credit		
	<p>and auto's (both original equipment manufacturers and auto suppliers). The targets were based on emissions intensity, which is a good start, but we feel that absolute targets are also required in order to demonstrate willingness to reduce overall emission levels coming from these sectors. Setting both intensity and absolute targets is considered best in class, and we feel that LBBW needs to be moving in this direction. Furthermore, the bank intends to publish targets on other sectors including cement, commercial real estate and further sectors in their annual update, where we highlighted that absolute targets would also be welcomed. The engagement with LBBW also highlighted that they are working on a sustainable finance framework on the lending side, focused on steering lending to taxonomy aligned assets. This would be welcomed and would improve their overall sustainability strategy and credibility.</p>		
Do you engage in voting for this fund?	Yes,	Do you conduct your own votes?	Yes
<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>	<p>No 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.</p> <p>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.</p> <p>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</p>	How many votes were proposed across the underlying companies in the fund?	

Fund Manager Product Response

Activity	Ninety One Global Total Return Credit		
	<p>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.</p>		
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?		<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? 	N/A, Not applicable for proxy voting
<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 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? 	,

Fund Manager Product Response

Activity	Ninety One Global Total Return Credit		
<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>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>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>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>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'? 	,	<p>Do you monitor the carbon emission levels or similar of the underlying companies in the fund?</p>	<p>Yes we measure contribution to carbon intensity</p>

Fund Manager Product Response

Activity	Ninety One Global Total Return Credit		
<ul style="list-style-type: none"> 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? 			
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	17.71

Activity	CT LDI Nominal Dynamic LDI Fund		
Do you undertake Engagements for this fund?	Yes,	How many engagements have you had with companies in the past 12 months?	23
How many engagements were made regarding climate change?		How many engagements were made regarding board diversity?	
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 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.	<p>Barclays PLC At the Q3 investor update, the company announced that it was accelerating its timeline to phase out the financing of thermal coal power in the US from 2035 to 2030, in line with its approach in the UK and EU. The decision was taken as a result of engagement with shareholders and the introduction of the Inflation Reduction Act in the US. HSBC Holdings PLC HSBC has updated its energy policy to include the ending of funding for new oil and gas projects. In particular it states: HSBC will not provide new finance, or new advisory services, to any client for the specific purposes of O&G exploration, appraisal, development, and production pertaining to: • ultra-deepwater offshore O&G projects; • shale oil projects; extra heavy oil projects; • projects in environmentally and socially critical areas; • infrastructure whose primary use is in conjunction with the above activities.</p>		
Do you engage in voting for this fund?	No, LDI Fund	Do you conduct your own votes?	Not applicable for this fund

Fund Manager Product Response

Activity	CT LDI Nominal Dynamic LDI Fund		
<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 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?	
How many votes did you abstain from?		<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? 	N/A, LDI Fund
<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>N/A, LDI 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 • 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

Fund Manager Product Response

Activity		CT LDI Nominal Dynamic 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'? 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 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>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, LDI Fund	<p>Do you monitor the carbon emission levels or similar of the underlying companies in the fund?</p>	Not Provided

Fund Manager Product Response

Activity	CT LDI Nominal Dynamic LDI Fund		
<ul style="list-style-type: none"> 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? 			
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	

Activity	Barings European Loan Fund		
Do you undertake Engagements for this fund?	Yes,	How many engagements have you had with companies in the past 12 months?	457
How many engagements were made regarding climate change?	132	How many engagements were made regarding board diversity?	15
How many engagements were made regarding waste reduction?	4	How many engagements were made regarding financials?	126
How many engagements were made regarding other issues?	180	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 engagements and outcomes from the last 12 months.	Barings' Global High Yield Investment Group engages with portfolio companies with a focus on changing behaviour in key risk areas and improving disclosure on key ESG topics in a part of the market, which generally lags equities and investment grade. The Group's research analysts are best placed to undertake this engagement process given their detailed knowledge of the companies and strong relationships with management and financial sponsors. Through engagement, we aim to enhance the performance of our investments, for the benefit of our clients, in line with our fiduciary duties. However, we do not attempt to impose an inflexible approach that ignores local norms and contexts. We believe that value is derived from transparent communication with the entities in which we invest, coupled with the expertise and discretion of our experienced analysts and portfolio managers. Below, we have set out some examples of key engagements initiated by Barings' Global High Yield Investment Platform over the last year to 31 May 2023. European Enterprise Resource Planning Software Provider Barings holds an existing investment in a UK-based provider of enterprise resource planning software. The company recently suffered from a cyberattack that was		

Activity	Barings European Loan Fund		
	<p>detected by internal systems. Immediate action was taken to mitigate the risk and isolate the affected infrastructure which resulted in certain systems being temporarily taken offline. Barings engaged with the company to obtain additional disclosure on the impact of the attack from a financial and operational perspective as well as actions being taken to reduce the threat of future attacks. Senior management offered Barings a call, where it was disclosed that it was a ransomware attack that affected one vertical within the business. Contingency plans were in place for the largest affected customers and the majority of affected systems were back online. Barings asked for further information around remediation progress on a subsequent all-lender call and senior management disclosed that external consultants had been hired to strengthen and accelerate the company's cybersecurity programme that would result in a leading system once complete. It was also disclosed that the UK Information Commissioner's Office (ICO) was investigating the incident, which could result in a fine for the Company. Barings maintained its investment but downgraded its social ESG rating to 4/Improving, reflecting the incident and ICO investigation but also the actions taken to strengthen internal controls. Barings continues to engage with management on this matter and will follow up on completion of the ICO investigation to better understand the outcome. Global Provider of Temporary Power Equipment Barings is an established lender to a global company that specialises in renting temporary power equipment. The business has a substantial fleet of generators and other temporary power products that are regularly maintained and replenished through capital expenditure as part of standard operations. During discussions with senior management and investor relations, Barings actively encouraged the company to prioritise reducing carbon emissions from their fleet and non-fleet operations. Regular disclosure of progress on this topic to investors was also requested - a practice that the company had not previously implemented. The company has now began incorporating ESG reporting slides into their regular quarterly reporting materials. Slides showcased updates on ESG initiatives, including investments in the fleet, green upgrades to incentivise customers to choose cleaner energy solutions, and the appointment of a new Director of ESG. These updates provide evidence of the company's initial progress in improving their sustainability profile, particularly in areas such as decarbonisation and governance reporting. Barings continues to hold the company's debt as a core investment and has an ongoing engagement to improve quantification of disclosed information regarding environmental plans. For further examples, please refer to Attachment 5 - Barings Global High Yield ESG Report 2022. We would be happy to discuss these further with you.</p>		
Do you engage in voting for this fund?	No, Proxy voting is not applicable to the Barings European Loan Fund. Where the Fund holds equity, this is as a result of restructurings, often this equity will be private and usual proxy voting mechanisms are not applicable.	Do you conduct your own votes?	Not applicable to the Barings European Loan Fund.

Fund Manager Product Response

Activity	Barings European Loan Fund		
<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>	<p>Not applicable to the Barings European Loan Fund.</p> <p>Not applicable.</p> <p>Not applicable.</p>	<p>How many votes were proposed across the underlying companies in the fund?</p>	
<p>How many times did you vote in favour of management?</p>		<p>How many times did you vote against management?</p>	
<p>How many votes did you abstain from?</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 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, Proxy voting is not applicable to the Barings European Loan Fund. Where the Fund holds equity, this is as a result of restructurings, often this equity will be private and usual proxy voting mechanisms are not applicable.</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>N/A, Proxy voting is not applicable to the Barings European Loan Fund. Where the Fund holds equity, this is as a result of restructurings, often this equity will be private and usual proxy voting mechanisms are not applicable.</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 • Outcome of the vote • Where you voted against management, did you communicate your intent to the company ahead of the vote? 	<p>N/A, Proxy voting is not applicable to the Barings European Loan Fund. Where the Fund holds equity, this is as a result of restructurings, often this equity will be private and usual proxy voting mechanisms are not applicable.</p>

Activity	Barings European Loan 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? 	<p>N/A, Proxy voting is not applicable to the Barings European Loan Fund. Where the Fund holds equity, this is as a result of restructurings, often this equity will be private and usual proxy voting mechanisms are not applicable.</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>N/A, Proxy voting is not applicable to the Barings European Loan Fund. Where the Fund holds equity, this is as a result of restructurings, often this equity will be private and usual proxy voting mechanisms are not applicable.</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, Proxy voting is not applicable to the Barings European Loan Fund. Where the Fund holds equity, this is as a result of restructurings, often this equity will be private and usual proxy voting mechanisms are not applicable.</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>N/A, Proxy voting is not applicable to the Barings European Loan Fund. Where the Fund holds equity, this is as a result of restructurings, often this equity will be private and usual proxy voting mechanisms are not applicable.</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>N/A, Proxy voting is not applicable to the Barings European Loan Fund. Where the Fund holds equity, this is as a result of restructurings, often this equity will be private and usual proxy voting mechanisms are not applicable.</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>N/A, Proxy voting is not applicable to the Barings European Loan Fund. Where the Fund holds equity, this is as a result of restructurings, often this equity will be private and usual proxy voting mechanisms are not applicable.</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>N/A, Proxy voting is not applicable to the Barings European Loan Fund. Where the Fund holds equity, this is as a result of restructurings, often this equity will be private and usual proxy voting mechanisms are not applicable.</p>	<p>Do you monitor the carbon emission levels or similar of the underlying companies in the fund?</p>	<p>Yes. We routinely consider climate-related risks and opportunities when analysing investments. Please note that while we do not currently disclose the exposure to fossil fuel assets at the strategy level, we are able to provide the exposure to these assets for any high yield fund upon request. As part of designing a portfolio that enable us to understand how each position contributes to climate change, we have developed a carbon methodology which reports carbon</p>

Fund Manager Product Response

Activity	Barings European Loan Fund		
<ul style="list-style-type: none"> 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? 			emissions for portfolios by using actual emissions if data is available, and to interpolate estimated emissions data using sector and country peers where data is unavailable. Our carbon reports generally show that Barings' funds have a lower carbon emissions exposure than relevant indices which supports our investors in their targets on climate change. We combined emissions from Scope 1 and Scope 2 into this calculation, which allows us to identify companies with a likely high level of carbon emissions. We believe this helps our credit analyst teams to focus on engagement activity with our portfolio companies where we need improved disclosures or changes in behaviour. In addition, this analysis enables our portfolio managers to view key contributors to portfolio emissions and to evaluate decisions to potentially reduce climate-related risks in our portfolios. In addition to carbon footprint metrics, we also review carbon intensity data at an asset level based on data compiled from MSCI and Sustainalytics. This is then weighted by asset size in order to calculate the weighted average carbon intensity of the portfolio. We review a combination of intensity metrics, including emissions scaled by company revenue and enterprise value. Currently, we focus on Scope 1 and 2 emissions due to the lack of availability and reliability of Scope 3 emissions data, but we will continue to monitor Scope 3 data going forward. Please see Attachment 3 for the Barings European Loan Fund's quarterly ESG report.
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	21.81

Activity	TwentyFour Absolute Return Credit Fund		
Do you undertake Engagements for this fund?	Yes,	How many engagements have you had with companies in the past 12 months?	77
How many engagements were made regarding climate change?	25	How many engagements were made regarding board diversity?	3
How many engagements were made regarding waste reduction?	0	How many engagements were made regarding financials?	39
How many engagements were made regarding other issues?	10	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 engagements and outcomes from the last 12 months.	The portfolio management teams identify and select issues to engage with – TwentyFour currently conducts direct engagement only and does not engage the services of third parties for any aspect of our engagement. Criteria considered when selecting issuers include, but are not		

Activity	TwentyFour Absolute Return Credit Fund
	<p>limited to, which issuers TwentyFour has the most influence over and what will have the greatest impact for our clients while ensuring we can maintain the quality of the engagements and monitoring. TwentyFour may also decide to engage if a company is taking action that we believe is detrimental to the interests of investors or the market as a whole even if we ourselves are not necessarily current bond holders</p> <p>A number of our engagements are still focussed on getting data as some companies, particularly ABS sponsors, have lagged in providing CO2 and other ESG metrics. Our main themes for engagements are climate risk and diversity within boards and a number of our more detailed engagements have been on those topics, including our carbon emissions engagement policy which encourages us to identify issuers with elevated emissions with whom we have an influencing relationship.</p> <p>Below we gave a couple of example engagements with their outcomes.</p> <p>Yorkshire Building Society – UK building society – environmental engagement</p> <p>Issue This engagement was conducted in relation to YBS's new 'Brass 10' Residential Mortgage Backed Securities transaction and came under our Carbon Emissions Engagement Policy, since YBS is lagging peers with respect to its ESG disclosures. Following the government's proposal for all UK homes to have a minimum EPC rating of C from 2035 (2025 for private landlords), we wanted to understand: the issuer's plans to reach this target, what green products it offers to incentivise homeowner upgrades, when it plans to disclose Scope 3 financed emissions, and any plans to reinforce its net zero commitments through signing up to the Science Based Targets initiative (STBi) or the Net Zero Banking Alliance.</p> <p>Response We discussed the reporting of Scope 3 emissions; we learned that YBS doesn't currently have a plan in place to report these but will consider it in the future, and we reiterated it was very important to us to obtain this data. YBS doesn't have any green products, but it is are looking at offering some in the near term, and we highlighted it is lagging peers in this regard. There are now plans to improve the average EPC rating to C on owner occupied mortgages (we asked the issuer to focus on this given it intends to be in line with net zero for Scope 1 & 2 emissions by 2025 and the minimum EPC of C is to be in line with net zero). On the social side, we challenged YBS on its social-labelled securitisation and if it was doing anything differently; the lender has not changed its lending criteria and believe in its social label on the grounds that it targets underserved borrowers (i.e. self-employed borrowers who wouldn't be accepted by high street banks) and provides affordable housing. YBS doesn't</p>

Activity	TwentyFour Absolute Return Credit Fund		
	<p>have specific targets to increase social lending as a proportion of its total origination, since this is already part of what it does and all the proceeds of Brass 10 have already been allocated for social lending. YBS has significantly grown its ESG team, so we do expect progress on the concerns we highlighted in the near future.</p> <p>Outcome There is plenty of scope for improvement, especially regarding net zero and green products. We will continue to monitor progress and follow up in six months.</p> <p>BHP Group Ltd – social engagement</p> <p>Issue We reached out to the multinational miner, BHP regarding the collapse of the Fundão tailings dam in Brazil in 2015 and their lack of action since.</p> <p>Action In their response only 96 of the 553 households displaced have been rebuilt and all 42 of the programs identified by the Renova Foundation are behind schedule. They provided insufficient detail on mitigation of future incidents nor actions taken to clean up and compensate for the disaster. Lack of action since the disaster highlights intrinsic social and governance concerns despite a strong raw ESG score.</p> <p>Outcome Do not invest.</p> <p>Akelius – Swedish residential property company – governance engagement</p> <p>Issue Akelius' purchase of a 12% stake in Castellum, a Swedish real estate company, raised some governance concerns for a number of reasons; it did not align with the company's investment plans, it came at a time when Castellum's owner was said to be in financial trouble, and it occurred when Castellum was in a blackout period, which tends to prohibit this kind of activity. We arranged a call with management to get further clarity on these issues and to determine whether there are material governance concerns.</p> <p>Response Overall response wasn't great and management really struggled to defend our claims. The relationship between the two CEOs remains suspicious, they are good friends and their rational for the purchases didn't go any further than 'it was cheap' which didn't fill us with confidence and we also have concerns Akelius could increase their stake further – increasing the divergence with the current investment plan. Overall there is reason to have governance concerns, we should continue to monitor this but not invest currently.</p> <p>Outcome Unsatisfactory rationale around governance concerns, remain</p>		

Fund Manager Product Response

Activity	TwentyFour Absolute Return Credit Fund		
	uninvested.		
Do you engage in voting for this fund?	No, Fixed Income Fund	Do you conduct your own votes?	N/A - As fixed income investors, our voting opportunities are limited.
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 N/A	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?	
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 • Outcome of the vote • Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A, Fixed Income 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 • Outcome of the vote • Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A, Fixed Income Fund N/A	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 • Outcome of the vote • Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A, Fixed Income Fund

Fund Manager Product Response

Activity		TwentyFour Absolute Return Credit Fund	
Do you have a vote you consider the fourth most significant for this fund?:	N/A, Fixed Income Fund	Do you have a vote you consider the fifth most significant for this fund?:	N/A, Fixed Income 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 Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote? 		<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? 	
Do you have a vote you consider the sixth most significant for this fund?:	N/A, Fixed Income Fund	Do you have a vote you consider the seventh most significant for this fund?:	N/A, Fixed Income 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 '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? 		<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? 	
Do you have a vote you consider the eighth most significant for this fund?:	N/A, Fixed Income Fund	Do you have a vote you consider the ninth most significant for this fund?:	N/A, Fixed Income 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 '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? 		<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? 	
Do you have a vote you consider the tenth most significant for this fund?:	N/A, Fixed Income Fund	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Yes, we monitor CO2 emissions for each company we invest in via our Observatory system. The metric we have chosen is Tonnes of CO2 / \$m of revenue. As mentioned, we utilise data obtained from Refinitiv's Asset4 database. We recognise that there are limitations in regards to the availability of carbon data provided by third party data providers. Therefore, we take an active approach in completing missing datasets. In cases where data is missing, the portfolio management team
<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'? 			

Fund Manager Product Response

Activity	TwentyFour Absolute Return Credit Fund		
<ul style="list-style-type: none"> 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? 			approach the issuer to develop a true understanding of their environmental and climate change practices.
What is the target turnover rate for the portfolio?	50	What was the actual turnover rate over the last 12 months?	35.9

Activity	Payden Absolute Return Bond Fund		
Do you undertake Engagements for this fund?	Yes,	How many engagements have you had with companies in the past 12 months?	234
How many engagements were made regarding climate change?	31	How many engagements were made regarding board diversity?	10
How many engagements were made regarding waste reduction?		How many engagements were made regarding financials?	
How many engagements were made regarding other issues?	151	Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> Sending standardised letters to companies Sending bespoke letters to companies Standard period engagement with companies Active private engagement on specific issues Active public engagement on specific issues 	Sending standardised letters to companies,Active private engagement on specific issues
Please discuss some of the key engagements and outcomes from the last 12 months.	Engagement Case Study 1 Engagement Case Study 2 - US Treasury (Sovereign) Engagement Case Study 3 - Acre Net Zero Environment: Climate Change Governance: Sponsor and borrower relationships Our Net Zero target was approved in November 2022. We intend to reach our net zero target through the implementation of an engagement strategy with issuers across holdings which factored in to our decision to launch our targeted engagement approach last year. Whilst the Absolute Return Bond does not have a Net Zero target, our NZAM approach will impact corporate allocations held in the Fund and was one of the drivers for GHG emissions and climate change topics to be included in engagement themes for the period. Our approach will use engagement with issuers as our primary lever to educate for progress toward decarbonization goals. Our centralised research function across all strategies enables us to scale our engagement approach to impact the maximum number of investee companies as well as impacting portfolios across our strategies. As a predominately fixed income manager we will participate in collective engagements to greater influence issuers. We selected this example as it reflects our targeted engagement approach which seeks specific outcomes related		

Activity	Payden Absolute Return Bond Fund
	<p>to ESG objectives. The objective of the engagement was to gain a greater understanding of the issuers plan to address climate change, particularly in light of an increasingly divergent climate view in the US population relative to a pro-climate stance by the current administration. The engagement aligned with our commitment under NZAM as well as climate mitigation initiatives as part of our SFDR Article 8 and SFDR Principal Adverse Impacts. We selected this example as it shows our integrated engagement approach across asset classes including securitised. CRE CLOs are balance sheet financing tools for commercial mortgage lenders. Bond investors lend against "bridge" loans collateralized by properties which are not stabilized. In many instances, the loans provide funds for property improvements, lease ups, etc. As a result, we must carefully understand the nature of CRE CLO sponsor's relationship with their borrowers. In 2023, given the upheaval in commercial real estate wrought by higher interest rates, it is particularly important to understand governance around the CRE CLO sponsor's lending practices. As part of our targeted engagement strategy, we launched an email campaign engaging with issuers to inquire about their progress on climate related disclosures and whether they have or are planning to sign up to a reduction target. The campaign was launched in Q2 2022. Our definition of aligned/aligning is based on data from legitimate third-party evaluators, for example, SBTi and Climate Action 100+, which we use to evaluate companies adhering to science-based standards. Of AUM in-scope, our target for engagement with issuers is: 60% by 2025, 90% by 2030, 100% by 2040. Payden has committed to an initial target of 30% AUM for our in-scope assets, which includes corporate debt and equity issuers. We believe there are existing and credible methodologies associated with these asset classes. Our definition of aligned/aligning is based on data from legitimate third-party evaluators, for example, SBTi and Climate Action 100+, which we use to evaluate companies adhering to science-based standards. The discussion with the Treasury Debt Management Office (DMO) involved a variety of representatives from Payden, including members of the economics, strategy, portfolio management and ESG teams. The DMO was transparent about their view of their role in the debt markets. They take a longer term perspective in issuance, not looking issue tactically, whether that be from a coupon or ESG related perspective. They are cognizant of their impact on market liquidity and converse with primary dealer to gauge feedback on new programs and expected demand. The Treasury's focus is on providing market stability and partners frequently with the Federal Reserve and FDIC to ensure smooth functioning markets. The engagement was an in-person meeting between Payden and members of the Treasury's DMO. Our team engaged ACRE (the CRE CLO sponsor) on a call with management to better understand the governance controls and provisions they have in place with respect to their borrowers. In particular, we sought to understand how often this sponsor works with their underlying borrowers. We also wanted to develop an understanding the tools and process ACRE would make use</p>

Activity	Payden Absolute Return Bond Fund
	<p>of in the event a borrower defaulted. We will continue to engage with issuers and look to increase our engagements on the topic during 2023. Our net zero commitment assumes that governments will follow through on their own commitments to ensure the objectives of the Paris Agreement are met. Our business model is comprised mostly of customized, institutional, separately managed accounts where clients determine their investment objectives and parameters. Our ability to adjust client guidelines is dependent on client consent which includes adjusting portfolio positioning to meet climate objectives. Therefore, using engagement with in-scope issuers provides the ability to make a real-world impact without changing client IMA's. The DMO has increased it's focus on climate under the current administration with the establishment of a Climate Hub, which is a new office and demonstrates their focus on climate as risk. They have considered green bond issuance, but have to date refrained given their concern that they may crowd out other sovereign issuers globally given their issuance size. In addition, they tend to issue into new programs only if there will be sufficient demand, flow, and potentially the ability to maintain a curve. They have also considered sustainably linked issuance given the direct link to climate metrics, but have not issued given the potential difficulty in valuing variable coupons and less liquidity. Despite this, climate related issuance is on the table. However they are uncertain on a potential method as the DMO realizes that they are not structured to find-fence and track use the of proceeds, which could open the government to greenwashing accusations. The Treasury's primary role in the market it to provide stability through steady and predictable issuance. Given that, their preference is to provide financing to government initiatives focused on climate through traditional Treasury issuance as it remains the most efficient channel to raise capital. We view recent developments and conversations on climate and the establishment of a climate office as important steps in the DMO's recognition that climate is a risk to be assessed. Our engagement uncovered a few important points. First we learned that 40% of the underlying borrowers were repeat customers of ACRE. This is a healthy share of repeat business, indicating to us that ACRE had a reasonably high familiarity with their borrower base, relative to a pool with 0% repeat borrowers. This is a credit positive governance observation. Additionally, we learned that their loans provide for effective recourse in the event a borrower defaults and ACRE elects to foreclose on the property collateral. In particular, our concern was that ineffective governance with respect to foreclosure would lead to a) longer resolution times b) potentially fraught litigation. Both of these would be credit negatives. However, ACRE communicated their practice of securing stock pledges against borrower equity (via UCC liens) which allow them to pursue foreclosure out of court via UCC foreclosures. This decision raises the probability that any potential issues at the property collateral level can be resolved quickly and cost effectively. We will continue to monitor their practices on this front to ensure there are no abuses and that any potential issues resolve as</p>

Fund Manager Product Response

Activity	Payden Absolute Return Bond Fund		
	indicated.		
Do you engage in voting for this fund?	No, Not applicable for this fund.	Do you conduct your own votes?	Not applicable for this fund.
Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	Not applicable for this fund. Not applicable for this fund. Not applicable for this fund.	How many 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?	
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 • Outcome of the vote • Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A, Not applicable for this 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 • Outcome of the vote • Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A, Not applicable for this fund. N/A	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 • Outcome of the vote • Where you voted against management, did you communicate your intent to the company ahead of the vote? 	N/A, Not applicable for this fund.

Fund Manager Product Response

Activity	Payden Absolute Return Bond 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, Not applicable for this 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, Not applicable for this 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, Not applicable for this 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, Not applicable for this 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? 	N/A, Not applicable for this 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? 	N/A, Not applicable for this fund.
<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, Not applicable for this fund.	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Yes, please see attached our ESG reports for the Payden Absolute Return Bond fund

Fund Manager Product Response

Activity	Payden Absolute Return Bond Fund		
<ul style="list-style-type: none">• 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?			
What is the target turnover rate for the portfolio?	80	What was the actual turnover rate over the last 12 months?	94

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.

