The Ian Williams Pension Fund - IS0009007

ESG REPORT – 31-Mar-2023



Summary



Scheme: The Ian Williams Pension Fund - IS0009007

Statement Date: 31-Mar-2023

Fund	Value (£)	% Holding
BLK IJF Dynamic Diversified Growth Fund	4,929,607.30	11.32%
L&G Life KY World Equity Index Fund GBP Currency Hedged	4,399,359.75	10.10%
L&G Life TA Sterling Liquidity Fund	887.90	0.00%
L&G Life FABT Real Long Duration Fund	4,978,725.35	11.44%
L&G Life FABS Real Short Duration Fund	1,961,906.91	4.51%
M&G Total Return Credit Investment Fund	10,259,965.55	23.57%
L&G Life FABP Fixed Short Duration Fund	859,808.18	1.97%
Aegon European ABS Fund	11,520,998.30	26.46%
Ninety One Global Multi-Asset Sustainable Growth Fund	4,079,179.66	9.37%
L&G Life FABR Fixed Long Duration Fund	546,896.80	1.26%

Summary



Fund	Fund Manager ESG Credentials	Fund ESG Credentials	
runu	Data Provided by FM as at	% Qs answered	Data Provided by FM as at
L&G Life FABP Fixed Short Duration Fund	31/03/2023	97	31/03/2023
Ninety One Global Multi-Asset Sustainable Growth Fund	31/03/2023	87	31/03/2023
BLK IJF Dynamic Diversified Growth Fund	31/03/2023	96	31/03/2023
L&G Life FABT Real Long Duration Fund	31/03/2023	97	31/03/2023
Aegon European ABS Fund	31/03/2023	99	31/03/2023
L&G Life FABS Real Short Duration Fund	31/03/2023	97	31/03/2023
L&G Life FABR Fixed Long Duration Fund	31/03/2023	97	31/03/2023
M&G Total Return Credit Investment Fund	31/03/2023	83	31/03/2023
L&G Life KY World Equity Index Fund GBP Currency Hedged	31/03/2023	97	31/03/2023
L&G Life TA Sterling Liquidity Fund	31/03/2023	97	31/03/2023

Summary



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	Legal and General (LGIM)		
Do you have an ESG policy that is integrated into the investment process?	Yes 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.	Are Senior Management accountable for ESG or Climate Change risks?	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 Integration, 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 credi
Do you have a firm ESG rating?	Yes LGIM has an award-winning Investment Stewardship team, with a track record of over 20 years. External validation and oversight keep us on our toes and propels us forward to keep improving. We participate in industry-wide assessments of our engagement and stewardship processes and are proud to have been nominated by industry bodies like the ICGN, ICSA and UN PRI for our: • Engagement activities disclosure • Marketwide involvement in lobbying activities • Strong implementation of ESG and corporate governance matters into our stewardship activities.	Do you have a dedicated team that considers ESG and Climate Change related factors?	Yes 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.



Questions	Legal and General (LGIM)		
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?	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	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 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	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.

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

Questions	Ninety One		
Do you have an ESG policy that is integrated into the investment process?	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. 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. 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.	Are Senior Management accountable for ESG or Climate Change risks?	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.
	Each investment team are responsible for managing their exposure to sustainability risks and opportunities within the portfolios they manage. Investment capabilities have developed and continue to develop high-quality integration approaches to identify and value sustainability risks. 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.		



Questions	Ninety One		
Do you have a firm ESG rating?	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.	Do you have a dedicated team that considers ESG and Climate Change related factors?	Yes ESG knowledge and expertise is held across a number of areas of the business.
	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.		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.
	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		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.
	Source: PRI Assessment report.		
	Past performance is not a guide to future performance.		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.
	We are pleased that our commitment to responsible investing and our continual efforts in deepening our integration processes have been reflected by our scores.		
	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		
	Please see the following link which provides further information around the scoring methodology: https://www.unpri.org/signatories/about-priassessment/3066.article		
Please provide your UNPRI survey scores	2021 scores: 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?	Yes The ESG research and data that we have access to is integrated with the investment research process, and is used to support our understanding of material information. Data is integrated in various ways depending on the strategy, including scorecards, research dashboard, and use of vendor research reports. 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



Questions	Ninety One		
			sources that we make use of are: MSCI ESG, Carbon Disclosure Project, ISS, RepRisk, Bloomberg, Clarity Al and our in-house investment data platform Jasmine.
Do you have a Climate Change policy that is integrated into the investment process?	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: - 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 Parisaligned, 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	Do you create your own ESG or Climate Change related scores	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.
Does your company have a policy on equality and diversity in the workplace?	Yes 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. Equality policy At the core of our values is the respect for the dignity and	Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?	Yes 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:



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. 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. Our Diversity Principles year, engagement details, adv trends and is published annual can access the report via the f/media/documents/sustainabil PRI Transparency and Assessn PRI Transparency and Assessn As a signatory, it is mandatory	on integration across the investment teams over the vocacy work, voting data, case studies and market illy covering the period from 1 April to 31 March. You following link: https://ninetyone.com/-lity/91-sustainability-and-stewardship-report-en.pdf
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. 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. Our Diversity Principles 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	on integration across the investment teams over the vocacy work, voting data, case studies and market lily covering the period from 1 April to 31 March. You following link: https://ninetyone.com/-lity/91-sustainability-and-stewardship-report-en.pdf ment reports y to report annually on our responsible investment
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and inclusion. These principles apply across the global	
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locally-based diversity and inclusion initiatives.	
Task Force on Climate-related	Financial Disclosures (TCFD)
1. In terms of diversity, we commit to zero variance in	,
compensation on a like-for-like basis.	
We will work proactively to rebalance our firm in line with	
	ts support for the TCFD in September 2018 and this
	se our exposure to and management of climate risk, ou can access the report via the following link:
	ia/documents/reports/91-tcfd-report-2021-en.pd
are held accountable and responsible for ensuring change.	ay accuments/reports/91 tera report 2021 empa
5. We believe in the importance and benefits of diversity and	
foster a culture that is supportive and inclusive of different	
perspectives and experiences. Online voting disclosure	
6. As an active investment manager, diversity of thought and	
perspective is an essential component in developing our investment views.	
	publicly on a monthly basis on the Ninety One
represent the diversity of our global client base.	
	ted-states/how-we-think/investing-for-a-world-of-
within the context of our culture. In that sense, our change/sustainable-investing/	'invest/proxy-voting-results
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 Annual Impact Reports	
flexible work arrangements where feasible.	
10. We will work towards achieving our targets through	
concrete actions rather than employing quotas.	
	ity-focused products, our Annual
	icant developments throughout the year, including all
	portfolios and underlying holdings as well as
We have created a D&I framework to enable change by engagement goals and progress considering diversity in all our people decisions. We apply our examples:	ss towards those goals. See the following links for
diversity principles practically through this framework using	
	eport: https://ninetyone.com/-
	port/91-global-environment-impact-report-2022-
1. Commitment and accountability of our senior leadership en.pdf	, ,
team. UK Sustainable Equity Impact	Report: https://ninetyone.com/-



Questions	Ninety One	
	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.	/media/documents/sustainability-report/91-uk-sustainable-equity-fund- sustainability-report-en.pdf Quarterly Sustainability Reports
	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	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.
	report we now have 33% women in our global senior leadership.	Other sustainability disclosures
	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.	We publish various sustainability disclosures on our website as per regulatory requirements i.e. SFDR disclosures.
	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.	
	Enabling change by embedding diversity in all our people decisions	
	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.	
	We work with universities and support the following cross- industry initiatives to promote and attract diverse talent, including:	
	'Investment 2020', which focuses on bringing diverse talent into all aspects of the asset management industry, including different socio-economic backgrounds. We work with 'Women Returners', whose mission is removing 'the career break penalty' for women who have taken an extended career break. By targeting this population we have the opportunity to increase gender diversity by providing opportunities for experienced and talented women to return to the industry. 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.	
	We place a greater emphasis on productivity than presenteeism and actively encourage flexible working where appropriate.	



Questions	Ninety One		
	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. 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. To help build a diverse talent pipeline, diversity is a key consideration in all our leadership development training opportunities. 3. Measuring our progress so we can challenge and change 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. 4. Promoting an inclusive work environment Our employee networks are essential for creating an environment where everyone can be themselves.		
Do ESG related factors get considered with respect to performance management of investment companies and funds?	Yes 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.	Are you signatories of the FRC UK Stewardship Code or equivalent?	Ninety One is a signatory to the updated 2020 UK Stewardship Code. 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.

Questions	BlackRock		
Do you have an ESG policy that is integrated into the investment process?		ESG or Climate Change risks?	Yes Yes, BlackRock has a dedicated Sustainable Investing team which oversees the firm's global efforts on sustainable investing. The BlackRock Sustainable Investing team partners with investment professionals to deliver innovative products and solutions, integrate sustainability considerations across investment processes, and drive sustainable investing research efforts. The BlackRock Sustainable Investing team works closely with the BlackRock Risk and Quantitative Analysis Group to ensure high-quality ESG integration across investment teams as well as



Questions	BlackRock		
	a framework for ESG integration that permits a diversity of approaches across different investment teams and strategies and is part of both our active investment process and index investment processes. As the materiality of ESG considerations varies by client objectives, investment style, sector, and macro considerations, our ESG integration framework needs to allow for flexibility across investment teams. BlackRock's active investors are responsible for integrating material ESG-related insights, consistent with their existing investment process, with the objective of improving long-term risk-adjusted returns. Depending on the investment approach, ESG measures may help inform the due diligence, portfolio construction, and/or monitoring processes of our active and alternatives platforms, as well as our approach to risk management. Our ESG integration framework is built upon our history as a firm founded on the principle of thorough and thoughtful risk management. Aladdin™, our core risk management and investment teams to effectively identify investment opportunities and investment risks. Our heritage in risk management combined with the strength of the Aladdin platform enables BlackRock's approach to ESG integration. BlackRock's ESG Integration Statement is available at: https://www.blackrock.com/corporate/literature/publication/blk-esg-investment-statement-web.pdf		with the BlackRock Investment Stewardship team and the Corporate Sustainability team to ensure a holistic approach to sustainability at BlackRock. All investment professionals are responsible for ensuring that ESG considerations are considered within BlackRock's investment practices. Senior representatives from each investment team across the firm lead in this effort, with support given by one or more representatives from investment groups across the firm, who work together to advance ESG research and integration, support active ownership, and develop sustainable investment strategies and solutions. The Risk and Quantitative Analysis Group, which is responsible for evaluating all investment, counterparty, and operational risk at the firm, evaluates ESG risk during its regular reviews with portfolio managers to ensure that investment teams have sufficiently considered ESG risk in their investment decisions, and that investments in highest ESG risk categories are deliberate, diversified and scaled.
Do you have a firm ESG rating?	Pyes BlackRock has been a signatory to the United Nations supported Principles for Responsible Investment (PRI) since 2008. The PRI is an independent nonprofit that encourages investors to use responsible investment to enhance returns and better manage risks. 2021 Assessment Report Results BlackRock's 2021 Assessment Report reflects the 2020 reporting period. Across almost all modules, BlackRock scored either 5 or 4 stars. Although the firm performed the least well across Hedge Funds modules (2-4 stars), which are notably the newest modules within the Pilot Reporting Framework, the achieved scores were well above the median. BlackRock received 4 stars with a score of 88% in the Investment and Stewardship Policy module with 22 out of 30 sub-indicators in this module receiving a top score. The firm scored very well (5 stars) across the Active Equity modules (Active Quantitative, Active Fundamental) and the Private Markets modules (Private Debt, Private Equity, Real Estate, Infrastructure) with a notable 100% score on Infrastructure. The firm also performed well across the fixed income modules (4 stars).	Do you have a dedicated team that considers ESG and Climate Change related factors?	BlackRock's dedicated Sustainable and Transition Solutions ('STS') team consists of over 31 professionals (as at 31 October 2022) across 12 offices who lead BlackRock's sustainability and transition strategy, drive cross-functional change, support client and external engagement, power product ideation, and embed expertise across the firm. STS works in close partnership with the BII Sustainable Investment Research & Analytics Team, which leads the firm's research on investment risks and opportunities of sustainability and the transition.
Please provide your UNPRI survey scores	2021 scores: Investment & Stewardship Policy - 4 stars (88/100) Direct - Listed equity - Active Quantitative - incorporation - 5 stars (96/100) Direct - Listed equity - Active Fundamental - incorporation - 5 stars (96/100) Direct - Listed equity - Investment Trusts - incorporation - 5 stars (96/100) Direct - Listed equity - Other - incorporation - N/A Direct - Listed equity - Passive - incorporation - 4 stars (67/100) Direct - Listed equity - Active Quantitative - voting - 4 stars (83/100) Direct - Listed equity - Active Fundamental - voting - 4 stars (83/100) Direct - Listed equity - Investment Trust - voting - 4	Do you rely on any third parties to provide ESG and Climate Change related analysis/research?	Yes Currently, BlackRock leverages third-party ESG data in addition to in-house research in order to gather company-level information on key ESG indicators. BlackRock has sourced ESG data from third-party providers since 2012. Our third-party sources include MSCI, ISS-Ethix, RepRisk, Sustainalytics, Refinitiv, Bloomberg, and others listed below. We routinely engage with investment research providers about our views on emerging issues and the type of research we would find useful. Provider* - Type MSCI - ESG Ratings, Research Sustainalytics - ESG Ratings Refinitiv - ESG Ratings, Research Bloomberg - ESG



Questions	BlackRock		
	stars (83/100) Direct - Listed equity - Other - voting - 4 stars (83/100) Direct - Listed equity - Passive - voting - 4 stars (83/100) Direct - Fixed Income - SSA - 4 stars (79/100) Direct - Fixed Income - Corporate - 4 stars (88/100) Direct - Fixed Income - Securitised - 4 stars (76/100) Direct - Fixed Income - Securitised - 4 stars (76/100) Direct - Fixed Income - Private debt - 5 stars (96/100) Direct - Private debt - 5 stars (93/100) Direct - Stars (93/100) Direct - Stars (93/100) Direct - Fixed Income - Private debt - 5 stars (93/100) Direct - Hedge funds - Long/short equity - incorporation - 4 stars (66/100) Direct - Hedge funds - Long/short credit - 3 stars (77/100) Direct - Hedge funds - Long/short credit - 3 stars (59/100) Direct - Hedge funds - Distress, special situations, and event-driven fundamental - 3 stars (59/100) Direct - Hedge funds - Structured credit - N/A Direct - Hedge funds - Global macro - N/A Direct - Hedge funds - Commodity trading advisor - N/A Direct - Hedge funds - Other - 2 stars (35/100) Indirect - Listed equity - Passive - 4 stars (69/100) Indirect - Fixed Income - Passive - 4 stars (69/100) Indirect - Fixed Income - Passive - 4 stars (84/100) Indirect - Fixed Income - Active - 4 stars (84/100) Indirect - Fixed Income - Active - 5 stars (91/100) Indirect - Fixed Stars (91/100) Indirect - Fixed Stars (91/100) Indirect - Stars (91/100) Indirect - Hedge Funds - 4 stars (81/100) Indirect - Fixed Income - Active - 5 stars (91/100) Indirect - Hedge Funds - 4 stars (81/100) Indirect - Fixed Income - Active - 5 stars (91/100) Indirect - Hedge Funds - 4 stars (81/100) Indirect - Fixed Income - Active - 5 stars (91/100) Indirect - Hedge Funds - 4 stars (81/100) Indirect - Fixed Income - Active - 5 stars (91/100) Indirect - Hedge Funds - 4 stars (81/100) Indirect - Fixed Income - Active - 5 stars (91/100) Indirect - Hedge Funds - 4 stars (81/100) Indirect - Fixed Fu		Ratings RepRisk - ESG Ratings Verisk Maplecroft - Climate Data ISS-Ethix - ESG Research SASB - Sustainability Accounting Framework CDP - Climate Data Rhodium - Climate Data Clarity AI - ESG Ratings, Research Baringa - Climate Data Climate Central - Climate Data Entis - ESG Research Field Gibson Media (Environmental Finance) - ESG Research Vivid Economics - ESG Research S&P Global - ESG Ratings, Research * While BlackRock leverages the above third-party sources to conduct ESG research, not all data sources are currently available within Aladdin tools.
Do you have a Climate Change policy that is integrated into the investment process?	Our sustainability strategy is focused on long-term value creation. As a fiduciary asset manager, we believe that our clients should consider how climate change, policy and economic shifts will affect returns in their portfolios. We believe that climate risk is investment risk: the net zero transition will reshape the real economy and financial portfolios, presenting risks and opportunities for investors. BlackRock's sustainability strategy focuses on two structural themes driving this change. • Climate Transition: Commitments to achieve net zero by governments, investors, and companies will fundamentally reshape the global economy and create a historic investment opportunity. We are committed to supporting the goal of net zero greenhouse gas emissions by 2050 or sooner. • Stakeholder Capitalism: It is clear that being connected to stakeholders enables a company to understand and respond to the changes happening in the world. In 2020, we saw how purposeful companies with better Environmental, Social, and Governance (ESG) profiles outperformed their peers during a global crisis. We create solutions to help clients towards their financial objectives and other goals by relating ESG characteristics to financial returns.	Do you create your own ESG or Climate Change related scores	Yes—The complex risks and opportunities associated with sustainability macro trends are materializing and will continue to accelerate in the medium term. We believe that there are resulting winners and losers, and with that in mind, we have developed a proprietary ESG scoring framework to capture companies' likelihood of mitigating risks and capturing opportunities associated with sustainability factors. Investors can now sift through hundreds, sometimes thousands of ESG-related datapoints on a given company, many of which were not available a few years ago. Crucially, only a fraction of these materially affect financial performance. We view disparities among measurement methodologies as market inefficiencies that enhance the opportunity to capture outperformance. BlackPEARL is a framework for measuring the sustainable attributes of companies with an investment materiality lens. BlackPEARL is a research-driven framework that combines quantitative and qualitative research using a systematic data driven approach to deliver unique ESG investment insights. It leverages multiple sources of data, including proprietary BlackRock information, and takes over 250 individual KPIs that capture the sustainable characteristics of companies across environmental, social and governance themes. The materiality matrix of BlackPEARL was built through a combination of insights. The starting point is the SASB framework which defines a list of material ESG indicators across 77 industries. We then overlay our own insights around issues that we fundamentally believe will have a higher impact on companies' financial performance going forward.
Does your company have a policy on equality and diversity in the workplace?	As part of its long-term commitment, BlackRock has instituted a multi-year DEI strategy that we believe is actionable, measurable, and designed to be relevant and applicable in different parts of the world. We review our DEI strategy at least annually, along with the corporate policies and programs that support it, so that the strategy remains aligned with the firm's business priorities and long-term objectives. BlackRock's DEI strategy centers on three key pillars: 1. BlackRock's Talent and	Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?	Pres BlackRock continually seeks to increase the flexibility and scope of our reporting capabilities to meet the demands of our clients and the evolving nature of the ESG data landscape. In 2022 this includes establishing an internal metric approval and usage process for client reporting whilst also enhancing our ability to produce variations of reports for varied client segments. This reporting template development is overseen by a governance process to aid consistency and appropriacy of metrics across our varied investment teams.





Questions	BlackRock		
	Culture across the Globe – by attracting, hiring, developing and retaining a diverse talent pipeline, cultivating an inclusive, equitable work environment in which employees feel connected to the culture and supported in pursuit of their goals, and fostering a connected culture among the firm's approximately 17,000 employees 2. BlackRock's Role as a Fiduciary on Behalf of Clients – leveraging ESG focused financial products as competitive differentiators and strengthening client relationships by engaging them on DEI 3. Policy and Social Impact in Underserved Communities – continuing to increase transparency on diversity disclosures and contributing to and investing in the long-term success and sustainability of underserved communities BlackRock embraces the responsibility it has to its employees and to the communities in which it operates, but also recognizes the scale and depth of realizing success and the sustained focus and efforts required to advance DEI at BlackRock and beyond.		
Do ESG related factors get considered with respect to performance management of investment companies and funds?	At BlackRock, we have always focused on helping our clients try to reach their long-term investment goals through resilient and well-constructed portfolios. Our investment conviction is that ESG-integrated portfolios can provide better risk-adjusted returns to investors over the long-term, and that ESG-related data provides an increasingly important set of tools to identify unpriced risks and opportunities within portfolios. BlackRock has a framework for ESG integration that permits a diversity of approaches across different investment teams and strategies and is part of both our active investment process and index investment processes. As the materiality of ESG considerations varies by client objectives, investment style, sector, and macro considerations, our ESG integration framework needs to allow for flexibility across investment teams. BlackRock's active investors are responsible for integrating material ESG-related insights, consistent with their existing investment process, with the objective of improving long-term risk-adjusted returns. Depending on the investment approach, ESG measures may help inform the due diligence, portfolio construction, and/or monitoring processes of our active and alternatives platforms, as well as our approach to risk management. Our ESG integration framework is built upon our history as a firm founded on the principle of thorough and thoughtful risk management. Aladdin TM , our core risk management and investment technology platform, allows investors to leverage material ESG data as well as the combined experience of our investment teams to effectively identify investment opportunities and investment risks. Our heritage in risk management combined with the strength of the Aladdin platform enables BlackRock's approach to ESG integration.	Are you signatories of the FRC UK Stewardship Code or equivalent?	BlackRock is a Tier 1 signatory to the UK Stewardship Code and has been a signatory since April 2010. We are aware of the expectations inherent in the 2020 revision of the Code and have submitted our 2020 required reporting in line with those expectations to the FRC's ahead of the 31 March 2021 deadline. We are awaiting response now from the FRC. As a fiduciary investor, BlackRock undertakes all investment stewardship engagements and proxy voting to understand and hold company leadership accountable for their actions that impact the value of our clients' assets. Our program applies to companies in all sectors and geographies, and irrespective of whether a holding is index only or index and active. BlackRock's stewardship activities are carried out by BlackRock Investment Stewardship, which is positioned as an investment function.



Questions	Aegon AM		
Do you have an ESG policy that is integrated into the investment process?	Responsible Investment Framework The Aegon AM Management Board (Aegon AM MB) oversees the implementation of the Responsible Investment (RI) Framework and associated policies. The Board is advised by an internal working group consisting of a broad representation of experts from investment, distribution and risk teams. The Aegon AM Sustainability Board (AMSB) serves as an advisory body to the Aegon AM MB for best practices concerning the company's sustainability related activities and aspirations, including RI activities. The AMSB reports directly to the Aegon AM MB. Within the wider Aegon Group, the AMSB acts as a local Sustainability Board and supports Aegon Group's sustainability initiatives and programs. In addition, performance against the firm's framework and policies is subject to regular policy attestation procedures, compliance reviews, internal audits and a semi-annual self-assessment procedure to create an internal KPI dashboard reported to both Boards. Responsible Investment Program oversight Aegon AM's RI team acts as a resource and central point of contact for all RI matters. Using the RI Framework, the team is responsible for maintaining an overview of all RI activities. In addition to providing sustainability research and guiding the company on best practices, the RI team manages the majority of the firm's engagement activities. With a focus on innovation and continuous improvement, the RI team also partners with the investment teams to enhance ESG integration efforts and help ensure consistency in dedicated RI strategies.	Are Senior Management accountable for ESG or Climate Change risks?	The Aegon AM Management Board oversees the implementation of the Responsible Investment Framework and associated policies. Aligning sustainability risks and stewardship activities to remuneration policies is an important component of Aegon AM's compensation programmes. Aegon AM maintains a remuneration policy that incorporates our global focus on integrating ESG factors into multiple components of the variable compensation structure.
Do you have a firm ESG rating?	ESG Rating Comments Each year various organizations assess our firm's RI strategy, program and policy. Aegon AM receives various ratings and rankings throughout the year. Please refer to the below table for examples of these independent ratings and rankings. Sustainalytics, 100/100 score for Aegon NV from the RI policy and program1 PRI signatory since 2011 1 As of February 2020. Based in whole or in part on Aegon NV's global RI policy and program. Sustainalytics does not require a fee for providing this ranking.	Do you have a dedicated team that considers ESG and Climate Change related factors?	A dedicated global RI team serves as a company-wide resource for RI practices. Team members lend their expertise to ESG integration initiatives, contribute to RI product development and lead active ownership and sustainability research activities to promote understanding of ESG issues. Furthermore, the RI specialists serve a central resource for RI education and best practices. As of December 31, 2022, the RI team consists of 19 professionals1. Primary duties of the RI team include: RI solutions and ESG integration Conduct sustainability research underpinning sustainability-themed solutions Support development of new RI solutions Support research analysts with ESG integration Advise on industry best practices Evaluate ESG training opportunities Evaluate external ESG research Engagement and voting Engage with issuers on behalf of most of our investment platforms Encourage change in an effort to generate long-term economic value and reduce risk



Questions	Aegon AM			
Please provide your UNPRI survey scores	Please refer to Exhibit 4 – 2021 PRI Assessment Report for Aegon AM UK and NL w Cover (summary scorecard p 4-6).	Do you rely on any third parties to provide ESG and Climate Change related analysis/research?	Seek compliance with client ESG requirements and demands Partner with other investors where appropriate Advisory and reporting Help develop, enhance and implement clients' RI policies Monitor ESG/RI policy and regulatory developments Produce RI reports and advise on client ESG reporting Coordinate and complete relevant external assessments of Aegon AM's RI capabilities IPersonnel may be employed by any of the Aegon AM affiliates. No At Aegon AM, we rely on our internal ESG assessments. This proprietary process combines internal insights with external ESG data. Although we rely on our internal ESG views, external sources of information are also important considerations in developing a well-informed opinion. In general, we view third-party ESG research as an input to our proprietary ESG research. That is, third-party ESG data provides a helpful assessment of an issuer's ESG characteristics, but it does not replace our own proprietary view on these matters. While we utilize this data, there are limitations, including varied and complex scoring methodologies, scores that are inconsistent and not easily comparable and the omission of important financial considerations. Ultimately, we combine external data and internal insights to address information gaps and form a holistic, independent view of an issuer's ESG profile. In addition, we believe relying solely on third-party data can be problematic. External ESG research is an input to our process as this data provides a helpful assessment of an issuer's ESG profile. The firm uses third party ESG data. External sources for ESG analysis may include: Specialized external vendors – Where available, the research teams use external ESG research providers for ESG-related data. Third-party ESG resources: Bloomberg – Bottom-up company research MSCI ESG ratings – Bottom-up company research Sustainalytics – Bottom-up company research Traditional rating agencies – Bottom-up company research Traditional rating agencies – Bottom-up company research Traditional rating agen	
Do you have a Climate Change policy that is integrated into the investment	Yes	Do you create your own ESG or Climate Change related scores	Platform that analysts monitor. Yes	



Questions	Aegon AM		
process?	We welcome open and constructive dialogues with our clients on the possibilities of how to reduce the carbon footprint or carbon intensity of investment portfolios. Over the past few years, Aegon AM has made significant steps in refining our climate change strategy, governance and approach to risk and opportunity measurement and implementation. In 2019, Aegon AM NL signed a commitment in support of the Dutch Government's National Climate Agreement, geared to meet the carbon emissions reduction targets under the Paris Climate Agreement. We also developed carbon measurement reporting and conducted targeted engagement to advocate for climate action and disclosure by investees and support climate action-oriented shareholder resolutions. In addition, in November 2021, Aegon AM signed the Net-Zero Asset Managers initiative, joining other asset management groups in committing support to the goal of net-zero greenhouse gas emissions by 2050 or sooner, in line with global efforts to limit global warming to 1.5 degrees Celsius. Aegon AM is committed to supporting investments aligned with this net-zero emissions target and collaborating with our clients on decarbonization, helping them achieve their own climate ambitions. As part of this initiative, we will continue to collaborate with clients on their decarbonization objectives and continue to engage with companies to encourage greenhouse gas measurement, targets and reduction. Climate change continues to be a key focal area for engagement initiatives. By supporting Climate Action 100+, we aim to encourage the world's largest corporate GHG emitters—including intensive sectors such as oil and gas, utilities and steel—take necessary action. We are also working with ShareAction on the Investor Decarbonization Initiative and with the PRI on engagements to reduce methane emissions with energy and utility companies and on moving companies to 100% renewables. Further, we conduct bilateral engagements on GHG emission reduction and water usage. Lastly, our commitment to net		Yes, the firm maintains its own ESG categories. Aegon AM has a proprietary ESG research framework that assigns issuers into one of five ESG categories. The process incorporates qualitative and quantitative factors as well as external and internal insights. ESG factors are systematically integrated into our bottom-up research process with a focus on financially material factors and the impact on fundamentals and/or valuations. By conducting our own assessment of the issuer's ESG profile and integrating financially material ESG criteria into the traditional financial analysis framework, we can form a comprehensive view of the investment and better evaluate future performance potential. Research analysts and portfolio managers evaluate data from various available third-party sources in combination with proprietary ESG research to assign investment opportunities into a proprietary ESG category. Through our ESG integration approach, we may uncover ESG-related risks or opportunities and identify potential investment opportunities. The proprietary analysis incorporates qualitative and quantitative factors to assess the potential materiality of the ESG issues and the effect on fundamentals. Although ESG factors are identified and assessed individually, we take a holistic approach to integrating ESG-specific factors along with more traditional fundamental analysis to understand the overall credit profile and how it affects the investment opportunity as a whole. After determining the potential economic impact, we consider various outcomes to help understand the potential effect on the investment. Materiality of an ESG factor is assessed by the impact it is anticipated to have on the issuer's fundamentals. Where deemed practical, an ESG category is assigned to public corporate, sovereign and structured issuers or securities, each with increasing magnitude of potential adverse impact. ESG categories 1. Leader – The fundamentals are positively affected by effective ESG practices. 2. Minimal risk – Fundamentally low e
Does your company have a policy on equality and diversity in the workplace?	As a global company, Aegon AM values the range of perspectives and skills a diverse, equitable and inclusive workforce brings to our business. Acknowledging, understanding and appreciating different backgrounds and perspectives can help us to evaluate investment opportunities from various angles and ultimately position us to better serve our clients. For our employees, we aim to create a truly safe and inclusive work environment. Our commitment to diversity equity and inclusion is demonstrated through our actions and	Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?	ESG reports are currently produced for certain portfolios on a semi-annual basis. ESG reports can also be created for other strategies and clients upon request. Aegon AM can collaborate with the client to evaluate ESG reporting requirements. Aegon AM has a standard ESG report that includes four primary components: ESG characteristics: Overview of the firm's approach to ESG integration and summary of the portfolio's ESG profile based on the firm's proprietary ESG view. ESG external view: Summary of the portfolio's ESG profile based on external ESG





Questions	Aegon AM		
	inclusive policies. Our Diversity, Equity & Inclusion Charter demonstrates our commitment to building a diverse workforce and creating an inclusive environment where everyone can thrive and be their authentic selves. Please refer to Exhibit 5 – Aegon AM DEI Charter.		categories or scores. Active ownership activities: Overview of engagement and voting within the portfolio, where applicable. Carbon footprint: Summary of the portfolio's carbon footprint including common carbon impact metrics such as weighted average carbon intensity and carbon risk. Please note that ESG reporting is subject to appropriate or meaningful data coverage. Depending on the portfolio's holdings, ESG data may or may not have sufficient coverage or provide relevant information.
Do ESG related factors get considered with respect to performance management of investment companies and funds?	Yes We measure our progress against the firm's three primary sustainability goals as follows:	Are you signatories of the FRC UK Stewardship Code or equivalent?	Yes Our approach to RI is consistent with the Financial Reporting Council's UK Stewardship Code which sets out good practice Principles on engagement with investee companies which UK-based institutional investors should aspire to. A statement outlining our compliance with The Code's Principles is provided on our website. Aegon AM is a signatory to the 2021 Stewardship Code. Please refer to Exhibit 6 – The Aegon UK Stewardship Code 2022 Compliance Statement.
	ESG integration: ultimately the objective of quality ESG integration as we define it is financial performance, this being a key metric to evidence our efforts. Furthermore, we review the processes we employ for ESG integration in monthly meetings among investment, risk and RI teams, with a view to continuous improvement and knowledge sharing.		
	Active ownership: we track progress on engagements with a milestone-based system and escalate our activities in consultation with key clients. We aim to vote all stocks we hold and regularly report progress on these activities.		
	Solutions: we regularly review the research underpinning portfolio construction for our RI solutions and track the assets under management for each of those strategies. In certain cases, we also track key performance indicators for issuers we deem to be 'improvers', where we are looking for specific improvements in their practices.		
	Furthermore, our targets will meet the target setting protocols of the Net Zero Asset Managers initiative and will be tracked accordingly.		



Questions	M&G Investments		
Do you have an ESG policy that is integrated into the investment process?	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.	Are Senior Management accountable for ESG or Climate Change risks?	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.
Do you have a firm ESG rating?	Yes	Do you have a dedicated team that considers ESG and Climate Change related factors?	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.
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 theTransparency link and UNPRI Assessment Method: Transparency Report	Do you rely on any third parties to provide ESG and Climate Change related analysis/research?	Yes Yes, MSCI, ISS, Eikon & RepRisk
Do you have a Climate Change policy that is integrated into the investment process?	At M&G, we recognise the urgency of near-term action and are committed to using the levers at our disposal to support real-world emissions reductions and economy-wide change. Collaboration with our clients is critical to support our climate objectives and address related issues through our investments and stewardship. We have set the following climate objectives: 1. Reach net zero emissions by 2050, following Paris-aligned decarbonisation pathways for our investments. This is supported by our interim targets set across our asset manager and asset owner businesses. 2. Contribute to real-world	Do you create your own ESG or Climate Change related scores	Yes, we have proprietary ESG scorecards to capture our ESG analysis.





Questions	M&G Investments		
	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 responsAbility. 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		
Does your company have a policy on equality and diversity in the workplace?	Yes Diversity and Inclusion (D&I) drives inspirational performance and innovation. Our clients are all diverse, so having a team that reflects this diversity helps us better serve their needs and deliver results. Our Diversity and Inclusion policy applies to all UK M&G plc employees and the ethos should be followed by anyone who works with us.	Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?	Yes Yes, we publish firm-wide periodic reports and we also publish fund-related information on our website such as 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
Do ESG related factors get considered with respect to performance management of investment companies and funds?	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 use within the investment decision-making and portfolio construction processes.	Are you signatories of the FRC UK Stewardship Code or equivalent?	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)



Activity	L&G Life FABP Fixed Short Duration Fund		
Do you undertake Engagements for this fund?	Yes, LDI Fund	How many engagements have you had with companies in the past 12 months?	33
How many engagements were made regarding climate change?	27	How many engagements were made regarding board diversity?	2
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: • 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, LDI 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?	
How many times did you vote in favour of management?		How many times did you vote against management?	



Activity	L&G Life FABP Fixed Short Duration Fund		
How many votes did you abstain from?		Do you have a vote you consider the most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be '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
Do you have a vote you consider the second most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'second most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you company ahead of the vote?	N/A, LDI Fund	Do you have a vote you consider the third most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'third most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund
Do you have a vote you consider the fourth most significant for this fund?:	N/A, LDI Fund	Do you have a vote you consider the fifth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fifth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund



Activity	L&G Life FABP Fixed Short Duration Fund		
Do you have a vote you consider the sixth most significant for this fund?:	N/A, LDI Fund	Do you have a vote you consider the seventh most significant for this fund?:	N/A, LDI Fund
Do you have a vote you consider the eighth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be '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	Do you have a vote you consider the nineth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'nineth 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
Do you have a vote you consider the tenth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'tenth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	-0.24

Activity	Ninety One Global Multi-Asset Sustainable Growth Fund
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Activity	Ninety One Global Multi-Asset Sustainable Growth Fund	d	
Do you undertake Engagements for this fund?	Yes,	How many engagements have you had with companies in the past 12 months?	30
How many engagements were made regarding climate change?	14	How many engagements were made regarding board diversity?	4
How many engagements were made regarding waste reduction?	1	How many engagements were made regarding financials?	4
How many engagements were made regarding other issues?	22	Which form of engagement is most representative of the approach taken for this fund over the last 12 months: • 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.	Note that total engagements across categories does not equal number of engagements because multiple topics are often covered in the same engagement meeting. Croda is a leading bio-based chemical producer that uses more than half bio-based inputs in its production processes. The company's output, which mainly serves as ingredients for products such as skin creams, vaccines, and biological pesticides, replaces carbon-intensive, fossil-fuel-based alternatives. Croda is an enabler of decarbonisation in industries such as personal care and crop protection. In addition, some of its products offer efficacy advantages, for instance, its adjuvants decrease the amount of active ingredients required in a pharmaceutical product to deliver the same health outcome. In the second quarter of 2022, we had an onsite meeting with Croda, visiting one of their manufacturing plants in Spain. This site visit was used to better understand the contribution of the company's new flavours and fragrances business which is made up of acquisitions from 2020 and 2021 – Iberchem and Parfex. Parfex, as a fine fragrance business, has developed a deep expertise in natural ingredients that has not yet been transferred to Iberchem, but this is a clear priority for Iberchem management and Croda more broadly. Notably, Iberchem has already established its "green future" label and we expect products that minimise environmental impact to grow. In the fourth quarter, we also visited the company's manufacturing site in the UK, in which we were exposed to the chemical production process and research & development facilities. Both site visits enhanced our understanding of the significant know-how required to use bio-based feedstocks both in manufacturing and research & development (95% of Croda's research & development pipeline is bio-based). The company's target is to increase feedstock from 52% bio-based (it used to be 69% prior to the Performance Technologies and Industrial Chemicals divestment) to 75% by 2030. Meeting this target is essential to both av		



Activity	Ninety One Global Multi-Asset Sustainable Growth Fund	1	
	decarbonising the chemical sector, and, subsequently, we have gained confidence in the Croda's ability to meet its ambitious goals. Relatedly, during our scope 3 discussions with the company, they highlighted the continuing work to better understand its emission baseline, with the company undertaking lifecycle analysis for all its key raw materials. Given the complexity in scope 3 calculations, we believe this is a key piece of work to ensure the company has the best possible understanding of its supply chain emissions and where it needs to target its decarbonisation efforts. Additionally, we engaged with Croda on its land/biodiversity targets and reporting. More specifically, we met with Dave Cherry, Managing Director of their Crop Protection business, who leads on Croda's Land Positive Commitment. We spent time discussing Croda's methodology for calculating land savings as a result of use of their bio-stimulants, adjuvants, and seed coatings. We asked Croda to provide more information around these calculations in follow up disclosures. We also discussed Croda's goal to develop a scientific-based target for the company's impact on nature with a desire to become "nature positive", although this remains very early stage. We also had a separate discussion relating to the company's exposure to biologically sensitive areas. Croda has so far not identified any operating areas within biologically sensitive areas, but some operate close by, so the company's mitigating efforts will be area specific. This is an area we will be continuing to monitor in 2023.		
Do you engage in voting for this fund?	Yes,	Do you conduct your own votes?	Yes
Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	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. 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	How many votes were proposed across the underlying companies in the fund?	976



Activity	Ninety One Global Multi-Asset Sustainable Growth Fun	d	
How many times did you vote in favour of management?	process, we can be certain the voting done is in the best interest of our clients. 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.		73
How many votes did you abstain from?	5	Do you have a vote you consider the most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be '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?	Yes, Schneider Electric SE 2022-05-05 Approve Merger by Absorption of IGE+XAO by Schneider Significant corporate transaction For The absorption of this already controlled subsidiary would simplify the company's capital structure. For N/A
Do you have a vote you consider the second most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'second most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did	,	Do you have a vote you consider the third most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'third most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you	,



Activity	Ninety One Global Multi-Asset Sustainable Growth Fun	d	
you communicate your intent to the company ahead of the vote?		communicate your intent to the company ahead of the vote?	
Do you have a vote you consider the fourth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fourth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	,	Do you have a vote you consider the fifth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fifth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	,
Do you have a vote you consider the sixth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'sixth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	,	Do you have a vote you consider the seventh most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'seventh most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	
Do you have a vote you consider the eighth most significant for this fund?:	,	Do you have a vote you consider the nineth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'nineth 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	,



Activity	Ninety One Global Multi-Asset Sustainable Growth Fund		
company ahead of the vote?		of the vote?	
Do you have a vote you consider the tenth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'tenth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	,	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Yes we measure contribution to carbon intensity
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	1.02

Activity	BLK IJF Dynamic Diversified Growth Fund		
Do you undertake Engagements for this fund?	Yes,	How many engagements have you had with companies in the past 12 months?	383
How many engagements were made regarding climate change?	234	How many engagements were made regarding board diversity?	30
How many engagements were made regarding waste reduction?	31	How many engagements were made regarding financials?	
How many engagements were made regarding other issues?	873	Which form of engagement is most representative of the approach taken for this fund over the last 12 months: • 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?	Yes,	Do you conduct your own votes?	BlackRock's proxy voting process is led by the BlackRock Investment Stewardship team (BIS), which consists of three regional teams – Americas ("AMRS"), Asia-Pacific ("APAC"), and Europe, Middle East and Africa ("EMEA") - located in seven offices around the world. The analysts with each team will generally determine how to vote at the meetings of the companies they cover. Voting decisions are made by members



Activity	BLK IJF Dynamic Diversified Growth Fund		
			of the BlackRock Investment Stewardship team with input from investment colleagues as required, in each case, in accordance with BlackRock's Global Principles and custom market-specific voting guidelines.
			While we subscribe to research from the proxy advisory firms Institutional Shareholder Services (ISS) and Glass Lewis, it is just one among many inputs into our vote analysis process, and we do not blindly follow their recommendations on how to vote. We primarily use proxy research firms to synthesise corporate governance information and analysis into a concise, easily reviewable format so that our investment stewardship analysts can readily identify and prioritise those companies where our own additional research and engagement would be beneficial. Other sources of information we use include the company's own reporting (such as the proxy statement and the website), our engagement and voting history with the company, and the views of our active investors, public information and ESG research.
			In summary, proxy research firms help us deploy our resources to greatest effect in meeting client expectations • BlackRock sees its investment stewardship program, including proxy voting, as part of its fiduciary duty to and enhance the value of clients' assets, using our voice as a shareholder on their behalf to ensure that companies are well led and well managed • We use proxy research firms in our voting process, primarily to synthesise information and analysis into a concise, easily reviewable format so that our analysts can readily identify and prioritise those companies where our own additional research and engagement would be beneficial • We do not follow any single proxy research firm's voting recommendations and in most markets, we subscribe to two research providers and use several other inputs, including a company's own disclosures, in our voting and engagement analysis • We also work with proxy research firms, which apply our proxy voting guidelines to filter out routine or non-contentious proposals and refer to us any meetings where additional research and possibly engagement might be required to inform our voting decision • The proxy voting operating environment is complex and we work with proxy research firms to execute vote instructions, manage client accounts in relation to voting and facilitate client reporting on voting
Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	We use Institutional Shareholder Services' (ISS) electronic platform to execute our vote instructions, manage client accounts in relation to voting and facilitate client reporting on voting. In certain markets, we work with proxy research firms who apply our proxy voting guidelines to filter out routine or non-contentious proposals and refer to us any meetings where additional research and possibly engagement might be required to inform our voting decision.	How many votes were proposed across the underlying companies in the fund?	11775



Activity	BLK IJF Dynamic Diversified Growth Fund		
	The BlackRock Stewardship team publishes statements on our analysis, engagements and votes in relation to certain high-profile proposals at company shareholder meetings. We publish these bulletins to highlight several of our key voting rationales as informed by our global voting guidelines, including when we vote against directors due to: insufficient progress on climate-related disclosures (particularly with regard to TCFD/SASB-aligned reporting); concerns about remuneration and/or overboarding; concerns about board oversight; and risk management in high profile situations, among others. We do not disclose our vote intentions in advance of shareholder meetings as we do not see it as our role to influence other investors. Our role is to send a signal to the company about how well we believe the board and management has done in delivering long-term shareholder value. Our vote bulletins can be found here: https://www.blackrock.com/corporate/about-us/investment-stewardship#engagement-and-voting-history		
How many times did you vote in favour of management?	10378	How many times did you vote against management?	570
How many votes did you abstain from?	155	Do you have a vote you consider the most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be '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?	Pes, Rio Tinto Plc 2022-04-08 Approve Climate Action Plan Voting decision expected to be of particular interest to clients. For Pass We endeavor to communicate to companies when we intend to vote against management, either before or just after casting votes in advance of the shareholder meeting. We publish our voting guidelines to help clients and companies understand our thinking on key governance matters that are commonly put to a shareholder vote. They are the benchmark against which we assess a company's approach to corporate governance and the items on the agenda to be voted on at the shareholder meeting. We apply our guidelines pragmatically, taking into account a company's unique circumstances where relevant. Our voting decisions reflect our analysis of company disclosures, third party research and, where relevant, insights from recent and past company engagement and our active investment colleagues.



Activity	BLK IJF Dynamic Diversified Growth Fund		
Do you have a vote you consider the second most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'second most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	Yes, Petroleo Brasileiro SA 2022-04-13 Percentage of Votes to Be Assigned - Elect Marcio Andrade Weber as Independent Director Yes Abstain [RU-M0000-004] Abstain due to lack of sufficient information at the time of voting. Pass We endeavor to communicate to companies when we intend to vote against management, either before or just after casting votes in advance of the shareholder meeting. We publish our voting guidelines to help clients and companies understand our thinking on key governance matters that are commonly put to a shareholder vote. They are the benchmark against which we assess a company's approach to corporate governance and the items on the agenda to be voted on at the shareholder meeting. We apply our guidelines pragmatically, taking into account a company's unique circumstances where relevant. Our voting decisions reflect our analysis of company disclosures, third party research and, where relevant, insights from recent and past company engagement and our active investment colleagues.	Do you have a vote you consider the third most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'third most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	Grupo Financiero Banorte SAB de CV 2022-04-22 Elect Adrian Sada Cueva as Director Voting decision expected to be of particular interest to clients. For Pass We endeavor to communicate to companies when we intend to vote against management, either before or just after casting votes in advance of the shareholder meeting. We publish our voting guidelines to help clients and companies understand our thinking on key governance matters that are commonly put to a shareholder vote. They are the benchmark against which we assess a company's approach to corporate governance and the items on the agenda to be voted on at the shareholder meeting. We apply our guidelines pragmatically, taking into account a company's unique circumstances where relevant. Our voting decisions reflect our analysis of company disclosures, third party research and, where relevant, insights from recent and past company engagement and our active investment colleagues.
Do you have a vote you consider the fourth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fourth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	Yes, Santos Limited 2022-05-03 Approve Capital Protection Voting decision expected to be of particular interest to clients. Against [SF-S0000-020] The request is either not clearly defined, too prescriptive, not in the purview of shareholders, or unduly constraining on the company Withdrawn We endeavor to communicate to companies when we intend to vote against management, either before or just after casting votes in advance of the shareholder meeting. We publish our voting guidelines to help clients and companies understand our thinking on key governance matters that are commonly put to a shareholder vote. They are the benchmark against which we assess a company's approach to corporate governance and the items on the agenda to be voted on at the shareholder meeting. We apply our guidelines pragmatically, taking into account a company's unique circumstances where relevant. Our voting decisions reflect our analysis of company disclosures, third party research and, where relevant, insights from recent and past company engagement and our active investment colleagues.	Do you have a vote you consider the fifth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fifth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	Yes, Equinor ASA 2022-05-11 Action Plan For Quality Assurance and Anti-Corruption Voting decision expected to be of particular interest to clients. Do Not Vote [HK-S0000-001] We consider this to be in the best interests of shareholders. Fail We endeavor to communicate to companies when we intend to vote against management, either before or just after casting votes in advance of the shareholder meeting. We publish our voting guidelines to help clients and companies understand our thinking on key governance matters that are commonly put to a shareholder vote. They are the benchmark against which we assess a company's approach to corporate governance and the items on the agenda to be voted on at the shareholder meeting. We apply our guidelines pragmatically, taking into account a company's unique circumstances where relevant. Our voting decisions reflect our analysis of company disclosures, third party research and, where relevant, insights from recent and past company engagement and our active investment colleagues.



Activity	BLK IJF Dynamic Diversified Growth Fund		
Do you have a vote you consider the sixth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'sixth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	Yes, Intel Corporation 2022-05-12 Advisory Vote to Ratify Named Executive Officers' Compensation Voting decision expected to be of particular interest to clients. Against [SF-M0500-010] Pay is not aligned with performance and peers. Fail We endeavor to communicate to companies when we intend to vote against management, either before or just after casting votes in advance of the shareholder meeting. We publish our voting guidelines to help clients and companies understand our thinking on key governance matters that are commonly put to a shareholder vote. They are the benchmark against which we assess a company's approach to corporate governance and the items on the agenda to be voted on at the shareholder meeting. We apply our guidelines pragmatically, taking into account a company's unique circumstances where relevant. Our voting decisions reflect our analysis of company disclosures, third party research and, where relevant, insights from recent and past company engagement and our active investment colleagues.	Do you have a vote you consider the seventh most significant for this fund?: • Company name • Date of the Vote • Summary of the resolution • On which criteria have you assessed this vote to be 'seventh most significant'? • Approximate size of the fund's/ mandate's holding as a the date of the vote • How did you vote? • Rationale of the voting decision • Outcome of the vote • Where you voted against management, did you communicate your intent to the company ahead of the vote?	Anthem, Inc. 2022-05-18 Adopt a Policy Prohibiting Direct and Indirect Political Contributions to Candidates Voting decision expected to be of particular interest to clients. Against [SF-S0000-020] The request is either not clearly defined, too prescriptive, not in the purview of shareholders, or unduly constraining on the company Fail We endeavor to communicate to companies when we intend to vote against management, either before or just after casting votes in advance of the shareholder meeting. We publish our voting guidelines to help clients and companies understand our thinking on key governance matters that are commonly put to a shareholder vote. They are the benchmark against which we assess a company's approach to corporate governance and the items on the agenda to be voted on at the shareholder meeting. We apply our guidelines pragmatically, taking into account a company's unique circumstances where relevant. Our voting decisions reflect our analysis of company disclosures, third party research and, where relevant, insights from recent and past company engagement and our active investment colleagues.
Do you have a vote you consider the eighth most significant for this fund?:	Yes, SCHRODER UK PUBLIC PRIVATE TRUST PLC 2022-05-18 Reappoint Grant Thornton UK LLP as Auditors Voting decision expected to be of particular interest to clients. For Pass We endeavor to communicate to companies when we intend to vote against management, either before or just after casting votes in advance of the shareholder meeting. We publish our voting guidelines to help clients and companies understand our thinking on key governance matters that are commonly put to a shareholder vote. They are the benchmark against which we assess a company's approach to corporate governance and the items on the agenda to be voted on at the shareholder meeting. We apply our guidelines pragmatically, taking into account a company's unique circumstances where relevant. Our voting decisions reflect our analysis of company disclosures, third party research and, where relevant, insights from recent and past company engagement and our active investment colleagues.	Do you have a vote you consider the nineth most significant for this fund?: • Company name • Date of the Vote • Summary of the resolution • On which criteria have you assessed this vote to be 'nineth 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?	Yes, The Home Depot, Inc. 2022-05-19 Elect Director Albert P. Carey Voting decision expected to be of particular interest to clients. Against [SF-M0201-019] Nominee serves on an excessive number of public company boards, which we believe raises substantial concerns about the director's ability to exercise sufficient oversight on this board. Pass We endeavor to communicate to companies when we intend to vote against management, either before or just after casting votes in advance of the shareholder meeting. We publish our voting guidelines to help clients and companies understand our thinking on key governance matters that are commonly put to a shareholder vote. They are the benchmark against which we assess a company's approach to corporate governance and the items on the agenda to be voted on at the shareholder meeting. We apply our guidelines pragmatically, taking into account a company's unique circumstances where relevant. Our voting decisions reflect our analysis of company disclosures, third party



Activity	BLK IJF Dynamic Diversified Growth Fund		
			research and, where relevant, insights from recent and past company engagement and our active investment colleagues.
Do you have a vote you consider the tenth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'tenth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	Yes, Woodside Petroleum Ltd. 2022-05-19 Approve BHP Petroleum Merger Voting decision expected to be of particular interest to clients. For Pass We endeavor to communicate to companies when we intend to vote against management, either before or just after casting votes in advance of the shareholder meeting. We publish our voting guidelines to help clients and companies understand our thinking on key governance matters that are commonly put to a shareholder vote. They are the benchmark against which we assess a company's approach to corporate governance and the items on the agenda to be voted on at the shareholder meeting. We apply our guidelines pragmatically, taking into account a company's unique circumstances where relevant. Our voting decisions reflect our analysis of company disclosures, third party research and, where relevant, insights from recent and past company engagement and our active investment colleagues.	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	

Activity	L&G Life FABT Real Long Duration Fund		
Do you undertake Engagements for this fund?	Yes, LDI Fund	How many engagements have you had with companies in the past 12 months?	33
How many engagements were made regarding climate change?	27	How many engagements were made regarding board diversity?	2
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: • 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	



Activity	L&G Life FABT Real Long Duration Fund		
Please discuss some of the key engagements and outcomes from the last 12 months.			
Do you engage in voting for this fund?	No, LDI Fund	Do you 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?	
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?: 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
Do you have a vote you consider the second most significant for this fund?:	N/A, LDI Fund	Do you have a vote you consider the third most significant for this fund?:	N/A, LDI Fund



Activity	L&G Life FABT Real Long Duration Fund		
Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?		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 fourth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fourth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund	Do you have a vote you consider the fifth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fifth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund
Do you have a vote you consider the sixth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'sixth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund	Do you have a vote you consider the seventh most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'seventh most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund
Do you have a vote you consider the eighth most significant for this fund?:	N/A, LDI Fund	Do you have a vote you consider the nineth most significant for this fund?:	N/A, LDI Fund



Activity	L&G Life FABT Real Long Duration Fund		
company ahead of the vote?		of the vote?	
Do you have a vote you consider the tenth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'tenth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A,	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	-0.47

Activity	Aegon European ABS Fund		
Do you undertake Engagements for this fund?	Yes,	How many engagements have you had with companies in the past 12 months?	132
How many engagements were made regarding climate change?	9	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: • Sending standardised letters to companies Sending bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues Active public engagement on specific issues	Sending bespoke letters to companies,Active private engagement on specific issues
Please discuss some of the key engagements and outcomes from the last 12 months.	Before investing in an ABS transaction, the investment team actively engages with relevant transaction parties in ABS, CLOs, CMBS and RMBS. Relevant transaction parties are the seller, sponsors, originator, CLO manager, the servicer and other transaction parties. Generally speaking, our engagement focus is on seeking positive change / impact with individual parties. However, this should eventually impact the market as a whole. We have created customized ESG questionnaires for each ABS sector, used in our engagement process. The results of the questionnaires are		



Activity	Aegon European ABS Fund		
	an important input for our ESG analysis of the originator, collateral, and structure risk. The ESG categorization of the specific transaction is again based on this ESG analysis. Furthermore, the dialogue with the relevant transaction parties can provide opportunities to highlight ESG risks, inform the relevant parties on sustainability concerns, promote growth in sustainable business lines or advocate for changes in transaction structures that align with responsible investment standards. Through engagement we are also able to influence ABS transactions during the 'sounding phase'. An important objective of our engagement efforts for European ABS is to increase availability of ESG-related (loan level) data. For us to make a proper and meaningful ESG analysis of the collateral, it is essential to have access to specific ESG-related data, like energy performance certificates of houses in case of mortgages, CO2 emission data about cars in case of auto loans. This is often not available and we urge parties to make this specific data available. As is our common practice, we start with sending the ABS issuer our ESG questionnaire specific for RMBS and consumer loan ABS. Then we have several meetings with the C-suite to discuss the answers to the questionnaire and express our recommendations. A very common recommendation to the originator is to increase the availability of ESG-related data. These engagements are led by the portfolio managers. Over the last year the availability of ESG-related data across European RMBS/ABS originators has grown, but is still limited. The availability of EPC data (Energy Performance Certificates) remains the main challenge to investors incorporating ESG factors in their RMBS assessments. This is also one of our most important engagement topics. Dutch and UK originators typically perform better, whereas Southern-European originators tend to lag. French originators are showing an improvement in data availability. For other examples please refer to the		
Do you engage in voting for this fund?	No,	Do you conduct your own votes?	Not applicable. Our fixed income funds do not have voting rights.
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.	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?	





Activity	Aegon European ABS Fund		
How many votes did you abstain from?		Do you have a vote you consider the most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be '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 - Fixed Income
Do you have a vote you consider the second most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'second most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you company ahead of the vote?	N/A, N/A - Fixed Income N/A	Do you have a vote you consider the third most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'third most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, N/A - Fixed Income
Do you have a vote you consider the fourth most significant for this fund?:	N/A, N/A - Fixed Income	Do you have a vote you consider the fifth most significant for this fund?:	N/A, N/A - Fixed Income



Activity	Aegon European ABS Fund		
Do you have a vote you consider the sixth most significant for this fund?: • Company name • Date of the Vote • Summary of the resolution • On which criteria have you assessed this vote to be 'sixth most significant'? • Approximate size of the fund's/ mandate's holding as a the date of the vote • How did you vote? • Rationale of the voting decision • Outcome of the vote • Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, N/A - Fixed Income	Do you have a vote you consider the seventh most significant for this fund?:	N/A, N/A - Fixed Income
Do you have a vote you consider the eighth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be '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, N/A - Fixed Income	Do you have a vote you consider the nineth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'nineth 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 - Fixed Income
Do you have a vote you consider the tenth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'tenth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, N/A - Fixed Income	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Yes. Please refer to the Exhibit 7 - ESG Report for the Aegon European ABS Fund, for carbon footprint metrics of the fund's ABS holdings. We estimate and report the carbon footprint and other climate metrics of portfolios in order to help our clients understand the climate impact of their investments.
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	25



Activity	L&G Life FABS Real Short Duration Fund		
Do you undertake Engagements for this fund?	Yes, LDI Fund	How many engagements have you had with companies in the past 12 months?	33
How many engagements were made regarding climate change?	27	How many engagements were made regarding board diversity?	2
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: • 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, LDI 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?	
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?: - 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	N/A, LDI Fund



Activity	L&G Life FABS Real Short Duration Fund		
		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 second most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'second most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund	Do you have a vote you consider the third most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'third most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund
Do you have a vote you consider the fourth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fourth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund	Do you have a vote you consider the fifth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fifth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund
Do you have a vote you consider the sixth most significant for this fund?:	N/A, LDI Fund	Do you have a vote you consider the seventh most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'seventh most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead	N/A, LDI Fund



Activity	L&G Life FABS Real Short Duration Fund		
company ahead of the vote?		of the vote?	
Do you have a vote you consider the eighth most significant for this fund?:	N/A, LDI Fund	Do you have a vote you consider the nineth most significant for this fund?:	N/A, LDI Fund
Do you have a vote you consider the tenth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'tenth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	-0.32

Activity	L&G Life FABR Fixed Long Duration Fund		
Do you undertake Engagements for this fund?		How many engagements have you had with companies in the past 12 months?	33
How many engagements were made regarding climate change?	27	How many engagements were made regarding board diversity?	2



Activity	L&G Life FABR Fixed Long Duration Fund		
How many engagements were made regarding waste reduction?	Eac the Paper Face Long Datation Faile	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: • 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, LDI 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?	
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?: 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



Activity	L&G Life FABR Fixed Long Duration Fund		
Do you have a vote you consider the second most significant for this fund?:	N/A, LDI Fund	Do you have a vote you consider the third most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'third most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund
Do you have a vote you consider the fourth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fourth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund	Do you have a vote you consider the fifth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fifth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund
Do you have a vote you consider the sixth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'sixth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund	Do you have a vote you consider the seventh most significant for this fund?: • Company name • Date of the Vote • Summary of the resolution • On which criteria have you assessed this vote to be 'seventh most significant'? • Approximate size of the fund's/ mandate's holding as a the date of the vote • How did you vote? • Rationale of the voting decision • Outcome of the vote • Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund
Do you have a vote you consider the eighth most significant for this fund?:	N/A, LDI Fund	Do you have a vote you consider the nineth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be `nineth most significant'?	N/A, LDI Fund



Activity	L&G Life FABR Fixed Long Duration Fund		
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?		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?: • Company name • Date of the Vote • Summary of the resolution • On which criteria have you assessed this vote to be 'tenth most significant'? • Approximate size of the fund's/ mandate's holding as a the date of the vote • How did you vote? • Rationale of the voting decision • Outcome of the vote • Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A, LDI Fund	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	-0.04

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: • 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.	INFORMA PLC Engagement Objective: To ensure that there is appropriate succession planning for INforma, British publishing, business intelligence, and exhibitions group Action Taken: M&G met with the Chairman and Head of IR Engagement Outcome: The board have regular and formal		



Activity	M&G Total Return Credit Investment Fund		
	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.		
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?: 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,



Activity	M&G Total Return Credit Investment Fund		
Do you have a vote you consider the second most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'second most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A,	Do you have a vote you consider the third most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'third most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A,
Do you have a vote you consider the fourth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fourth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A,	Do you have a vote you consider the fifth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fifth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A,
Do you have a vote you consider the sixth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'sixth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A,	Do you have a vote you consider the seventh most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'seventh most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A,
Do you have a vote you consider the eighth most significant for this fund?:	N/A,	Do you have a vote you consider the nineth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'nineth most significant'?	N/A,



Activity	M&G Total Return Credit Investment Fund		
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?		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?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'tenth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A,	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	As an asset manager, we use a range of information, including portfolio alignment data and scenario modelling, to identify exposure to climate risk across our clients' portfolios. We have a range of tools used to identify and assess risks including our Portfolio Analytics Tool (PAT) and Coal Tool, which provide a quantitative assessment of investees' exposure to climate risks and opportunities. Our portfolio analytics tool (PAT), which incorporates NZIF metrics, allows our investment teams to monitor and visualise climate data and enables them to track progress against relevant benchmarks. In 2022, the PAT was updated to reflect the latest climate science and bring the NZIF in line with relevant IIGCC guidelines. 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 KY World Equity Index Fund GBP Currency Hedged		
Do you undertake Engagements for this fund?	Yes,	How many engagements have you had with companies in the past 12 months?	595
How many engagements were made regarding climate change?	111	How many engagements were made regarding board diversity?	70
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: • 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?	Yes,	Do you conduct your own votes?	LGIM's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically



Activity	L&G Life KY World Equity Index Fund GBP Currency Hedged		
			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?	38823
How many times did you vote in favour of management?	30036	How many times did you vote against management?	7908
How many votes did you abstain from?	271	Do you have a vote you consider the most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be '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?	Yes, Amazon.com, Inc. 2022-05-25 Resolution 1f - Elect Director Daniel P. Huttenlocher LGIM pre-declared its vote intention for this resolution, demonstrating its significance. 1.829406 Against Human rights: A vote against is applied as the director is a long-standing member of the Leadership Development & Compensation Committee which is accountable for human capital management failings. 0.933 LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.
Do you have a vote you consider the second most significant for this fund?: • Company name • Date of the Vote • Summary of the resolution • On which criteria have you assessed this vote to be 'second most significant'? • Approximate size of the fund's/ mandate's holding as a the date of the vote • How did you vote? • Rationale of the voting decision	Yes, Alphabet Inc. 2022-06-11 Resolution 7 - Report on Physical Risks of Climate Change Yes 1.184012 For Shareholder Resolution - Climate change: A vote in favour is applied as LGIM expects companies to be taking sufficient action on the key issue of climate	Do you have a vote you consider the third most significant for this fund?: • Company name • Date of the Vote • Summary of the resolution • On which criteria have you assessed this vote to be 'third most significant'? • Approximate size of the fund's/ mandate's holding as a the date of the vote • How did you vote? • Rationale of the voting decision	Yes, Meta Platforms, Inc. 2022-05-25 Resolution 5 - Require Independent Board Chair LGIM considers this vote to be significant as it is in application of an escalation of our vote policy on the topic of the combination of the board chair and CEO (escalation of engagement by vote). 0.783661 LGIM voted in favour of the shareholder resolution (management recommendation: against).



Activity	L&G Life KY World Equity Index Fund GBP Currency He	edged	
Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	change. 0.177 LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.	Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	Shareholder Resolution - Joint Chair/CEO: A vote in favour is applied as LGIM expects companies to establish the role of independent Board Chair. 0.167 LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.
Do you have a vote you consider the fourth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fourth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	Yes, NVIDIA Corporation 2022-06-02 Resolution 1g - Elect Director Harvey C. Jones LGIM views diversity as a financially material issue for our clients, with implications for the assets we manage on their behalf. 0.77083 Against Diversity: A vote against is applied as LGIM expects a company to have at least 25% women on the board with the expectation of reaching a minimum of 30% of women on the board by 2023. We are targeting the largest companies as we believe that these should demonstrate leadership on this critical issue. Independence: A vote against is applied as LGIM expects a board to be regularly refreshed in order to maintain an appropriate mix of independence, relevant skills, experience, tenure, and background. 0.838 LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.	Do you have a vote you consider the fifth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fifth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	Yes, Berkshire Hathaway Inc. 2022-04-30 Resolution 1.9 - Elect Director Susan L. Decker LGIM considers this vote significant as it is an escalation of our climate-related engagement activity and our public call for high quality and credible transition plans to be subject to a shareholder vote. 0.716099 Withhold Climate Change: A WITHHOLD vote is warranted for lead independent director Susan Decker as the company does not adequately disclose climate change-related risks and opportunities. Independence: A WITHHOLD vote is applied as LGIM expects a board to be regularly refreshed in order to maintain an appropriate mix of independence, relevant skills, experience, tenure, and background. 0.866 LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.
Do you have a vote you consider the sixth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'sixth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	Yes, Exxon Mobil Corporation 2022-05-25 Resolution 6 - Set GHG Emissions Reduction targets Consistent With Paris Agreement Goal LGIM considers this vote significant as it is an escalation of our climate-related engagement activity and our public call for high quality and credible transition plans to be subject to a shareholder vote. FOR A vote FOR is applied in the absence of reductions targets for emissions associated with the company's sold products and insufficiently ambitious interim operational targets. LGIM expects companies to introduce credible transition plans, consistent with the Paris goals of limiting the global average temperature increase to 1.5 C. This includes the disclosure of scope 1, 2 and material scope 3 GHG emissions and short-,	Do you have a vote you consider the seventh most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'seventh most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	Yes, JPMorgan Chase & Co. 2022-05-17 Resolution 1c - Elect Director Todd A. Combs LGIM considers this vote to be significant and predeclared our vote intention as an esclation of our concerns regarding remuneration. LGIM also considers this vote to be significant as it is in application of an escalation of our vote policy on the topic of the combination of the board chair and CEO (escalation of engagement by vote). LGIM has a longstanding policy advocating for the separation of the roles of CEO and board chair. These two roles are substantially different, requiring distinct skills and experiences. Since 2015 we have supported shareholder proposals seeking the appointment of independent board chairs, and since 2020 we have voted against all combined board chair/CEO roles. 0.593892



Activity	L&G Life KY World Equity Index Fund GBP Currency He	edged	
	medium- and long-term GHG emissions reduction targets consistent with the 1.5 C goal. 0.271 LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.		Against Accountability: Joint Chair/CEO: A vote AGAINST the relevant director is applied as LGIM expects companies to respond to a meaningful level of shareholder support requesting the company to implement an independent Board Chair.Remuneration: Escalation: A vote AGAINST the re-election of Stephen Burke (Committee Chair), Linda Bammann, Todd Combs and Virginia Rometty is applied in light of the one-off time-based award and our persistent concerns about pay structures at the Company. As members of the Compensation Committee, these directors are deemed accountable for the Company's pay practices. 0.953 LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.
Do you have a vote you consider the eighth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be '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?	Yes, The Home Depot, Inc. 2022-05-19 Resolution 6 - Require Independent Board Chair LGIM considers this vote to be significant as it is in application of an escalation of our vote policy on the topic of the combination of the board chair and CEO (escalation of engagement by vote). 0.531669 LGIM voted in favour of the shareholder resolution (management recommendation: against). Shareholder Resolution - Joint Chair/CEO: A vote in favour is applied as LGIM expects companies to establish the role of independent Board Chair. 0.239 LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.	Do you have a vote you consider the nineth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'nineth 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?	Yes, Chevron Corporation 2022-05-25 Resolution 1I - Elect Director Michael K. Wirth LGIM considers this vote to be significant as it is in application of an escalation of our vote policy on the topic of the combination of the board chair and CEO (escalation of engagement by vote). LGIM has a longstanding policy advocating for the separation of the roles of CEO and board chair. These two roles are substantially different, requiring distinct skills and experiences. Since 2015 we have supported shareholder proposals seeking the appointment of independent board chairs, and since 2020 we have voted against all combined board chair/CEO roles. 0.513524 Against Joint Chair/CEO: A vote against is applied as LGIM expects companies to separate the roles of Chair and CEO due to risk management and oversight. 0.924 LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.
Do you have a vote you consider the tenth most significant for this fund?: • Company name • Date of the Vote • Summary of the resolution • On which criteria have you assessed this vote to be 'tenth most significant'? • Approximate size of the fund's/ mandate's	Yes, Bank of America Corporation 2022-04-26 Resolution 1g - Elect Director Brian T. Moynihan LGIM considers this vote to be significant as it is in application of an escalation of our vote policy on the topic of the combination of the board chair and CEO (escalation of engagement by vote). LGIM has a	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Yes - the fund produces approximately 181.3 Weighted Average Carbon Emissions Scope 1 + Scope 2 (Tonnes CO2e per 1 million USD Invested) as of 31 March 2023



Activity	L&G Life KY World Equity Index Fund GBP Currency He	dged	
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?	longstanding policy advocating for the separation of the roles of CEO and board chair. These two roles are substantially different, requiring distinct skills and experiences. Since 2015 we have supported shareholder proposals seeking the appointment of independent board chairs, and since 2020 we have voted against all combined board chair/CEO roles. 0.46036 Against Joint Chair/CEO: A vote against is applied as LGIM expects companies to separate the roles of Chair and CEO due to risk management and oversight. 0.951 LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.		
What is the target turnover rate for the portfolio?		What was the actual turnover rate over the last 12 months?	-0.03

Activity	L&G Life TA Sterling Liquidity Fund		
Do you undertake Engagements for this fund?	Yes,	How many engagements have you had with companies in the past 12 months?	33
How many engagements were made regarding climate change?	27	How many engagements were made regarding board diversity?	2
How many engagements were made regarding waste reduction?		How many engagements were made regarding financials?	
How many engagements were made regarding other issues?	2	Which form of engagement is most representative of the approach taken for this fund over the last 12 months: 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,	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



Activity	L&G Life TA Sterling Liquidity Fund		
Do you use a third party to vote on your behalf? If Yes, please provide the details of your provider and any comments	LGIM's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by LGIM and we do not outsource any part of the strategic decisions. To ensure our proxy provider votes in accordance with our position on ESG, we have put in place a custom voting policy with specific voting instructions.	How many 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?: 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?:	N/A,	Do you have a vote you consider the third most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'third most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A,



Activity	L&G Life TA Sterling Liquidity Fund		
Do you have a vote you consider the fourth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fourth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A,	Do you have a vote you consider the fifth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'fifth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A,
Do you have a vote you consider the sixth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'sixth most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A,	Do you have a vote you consider the seventh most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'seventh most significant'? Approximate size of the fund's/ mandate's holding as a the date of the vote How did you vote? Rationale of the voting decision Outcome of the vote Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A,
Do you have a vote you consider the eighth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be '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,	Do you have a vote you consider the nineth most significant for this fund?: Company name Date of the Vote Summary of the resolution On which criteria have you assessed this vote to be 'nineth 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 tenth most significant for this fund?:	N/A,	Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Yes - the fund produces approximately 2.8 Weighted Average Carbon Emissions Scope 1 + Scope 2 (Tonnes CO2e per 1 million USD Invested) as of 31 March 2023



Activity	L&G Life TA Sterling Liquidity Fund		
 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?	-5.9

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 it 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 affects 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.

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of the Year







