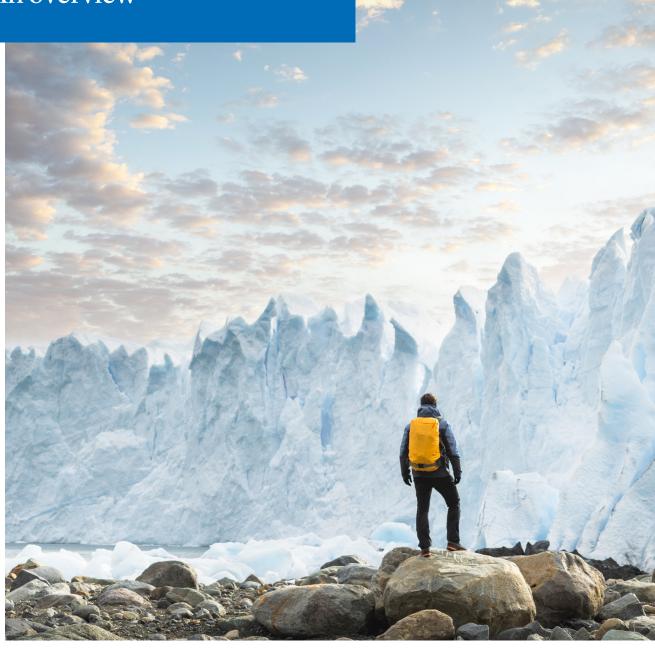
Climate Impact Pledge

An overview









A vital way to address climate change is to reach net zero carbon emissions by 2050 globally. Carbon emissions is one of the key greenhouse gases (GHGs) that, when emitted into the atmosphere, are responsible for the greenhouse effect on the planet.

What this means is that globally we need to emit no more carbon emissions into the atmosphere than the earth can absorb. Therefore, to reach net zero, the things that emit carbon (industry, agriculture, energy extraction and use) need to match the things that absorb carbon in our natural world (trees, soil, oceans) and via new technologies, for example for carbon capture.

This is all part of the mission to prevent global warming going above a dangerous temperature.

An international climate change treaty, called the Paris Agreement, aims to stop the world's average temperature rise to well-below 2°C, or ideally 1.5°C. Today, we are at approximately 1.1°C and already witnessing the devastating effects of global warming.

To help address this critical threat, in 2016, Legal & General Investment Management (LGIM) launched our targeted climate engagement programme. LGIM's Climate Impact Pledge assesses approximately 1,000 companies worldwide – across 15 climatecritical sectors – on their climate governance, strategies, policies, metrics and targets.

From oil and gas, clothing and airlines to technology, food manufacturing and utilities, we have selected the companies that are responsible for more than half of greenhouse gas emissions from the world's largest listed companies.

In addition to a data-driven assessment of climate commitments and efforts of these companies to limit carbon emissions to net zero by 2050, we engage with a subset of these to influence and support them to reach this objective.

We act as shareholders on behalf of our members and clients. As a result, if companies fall short of minimum expectations and fail to address their climate responsibilities over time, we act by using our granted investor voting rights – such as voting against the re-election of a company director/chair in annual general meetings. Ultimately, we may exclude them (dependent on guidelines of the relevant investment agreement) from those fund and pension ranges that adopt the Climate Impact Pledge.

In this kind of environment, companies need to show they can change and adapt. Through the Climate Impact Pledge, the aim is to influence the direction of companies to evolve into better versions of themselves, to avoid exacerbating global warming.

"

LGIM's Climate Impact Pledge assesses approximately 1,000 companies worldwide – across 15 climate-critical sectors.

How we measure

Our assessment draws upon around 65 data points, including our own climate modelling tool (called Destination@Risk), which involves robust measurement of the climate risk embedded in investments and their climate alignment as well as several reputable third-party data providers.

Companies are scored out of a 100 across five key areas:

1.

Governance

How is the oversight of climate issues managed at the board level and communicated to investors?

2.

Strategy

What policies do companies have in place, and what policies are they lobbying governments for?

3.

Risks and opportunities

How much of companies' current earnings comes from 'green' activities and how much of potential future earnings is at risk in the low-carbon transition (shift from an economy that depends heavily on fossil fuels to a sustainable, low carbon economy)?

4.

Scenario analysis

What level of global warming are companies' plans aligned to?

5.

Metrics and targets

How ambitious are companies' emission targets, and how do they compare to past performance?

Compliance with individual indicators within these five areas is assessed through a traffic light system.

To be transparent and to help raise best practice standards across global markets, we make these climate ratings publicly available.

- Red Companies falling below our global minimum standards in this area.
- Yellow Companies that have met our global minimum standards but room for improvement remains.
 - **Green** Companies that have exceeded our global minimum standards in this area.





There are several minimum standards or minimum expectations we look for when assessing companies. These include sector-specific questions such as:

Does the company...

- Have board member(s) with responsibility for climate-related issues?
- · Have comprehensive climate disclosures?
- Have an environmental policy?
- Have a GHG (greenhouse gases) reduction programme?
- Have a (no) deforestation programme?
- Have a responsible investment programme?
- Consider environmental impact in product design?
- · Disclose life-cycle assessment of emissions?
- Demonstrate a year-on-year reduction in emissions intensity?

Through data sources, we measure companies globally against these minimum standards. We vote against companies that do not meet at least one – or, for companies in North America, Europe and Australasia, three – of the minimum standards.



Over the past year, there has been significant progress across all sectors, as more companies set net zero ambitions. In 2022, the number of those voted against for not meeting minimum expectations **decreased by over 35%** since 2021 – highlighting the impact of the approach and the increased global focus on climate change.

In-depth priority engagements and exclusion

We select approximately 60 companies each year (from the existing list of approximately 1,000 companies) for a priority 'in-depth engagement'.

Sector experts from across LGIM's stewardship and investment teams work more closely with these companies to actively progress climate-related strategies and processes.

These companies are chosen because they are influential in their sectors, but in our view are not yet 'leaders' on climate change.

Further measurement is in place for those that are selected, under a sector-specific 'red line' method.

Examples of red lines:

- · No operational emissions target
- No disclosure of Scope 3 emissions (indirect emissions that occur in a company's value chain)
- · No restrictions around coal investing
- Plans to increase thermal coal capacity
- · No plans for coal phase-out
- Lack of a comprehensive deforestation (clearing of forested land) policy
- Lack of comprehensive regenerative agriculture policy

Where companies do not perform well in the data assessment, are unresponsive to engagement recommendations, and/or cross one of the sector-specific red lines listed previously, we can ultimately make the decision to reduce holdings or exclude investment in them in certain funds. See the examples below.

If a company fails to meet our minimum expectations and red lines, a decision will be taken whether to reduce investment holdings in it or exclude the company altogether. The decision is considered and finalised through a robust internal governance process. Resulting actions are then implemented by the relevant investment manager as part of the annual update of the Pledge.

We continue to monitor companies after they have taken the decision to exclude/reduce them from relevant funds. Companies can be reinstated back into funds (that adopt the Climate Impact Pledge) if we believe that they have made satisfactory improvements.

Examples of where we have decided to reduce holdings or exclude a company



Company in the cement sector

Reason: Breach of red lines including no operational emissions reduction target in place. Unsatisfactory responses to engagement and no improvements made since voting against the company Chair, due to the same concerns.



Company in the food sector

Reason: Progress on lower-impact products but no deforestation policy published and no targets or disclosure for Scope 3 emissions (includes all indirect emissions that occur in the value chain of a company) from agricultural products.



Company in the real estate sector

Reason: Breach of red lines including no disclosure of emissions from property portfolio or emissions target covering property portfolio's operational emissions. No improvements made following engagement and an earlier vote against the company Chair for the same reason.



Company in the utilities sector

Reason: Increased ambition for emissions reduction targets. However, pathway to action is seemingly misaligned as company plans to have coal running until 2050.





Important information This document is not a financial promotion nor a marketing communication.

It has been produced by Legal & General Investment Management Limited as thought leadership which represents our intellectual property and may include our views on significant governance issues which can affect listed companies and issuers of securities generally. It intentionally refrains from describing any products or services provided by any of the regulated entities within our group of companies, this is so the document can be distributed to the widest possible audience without geographic limitation.

Legal & General Investment Management LGIM Disclaimer and important legal notice.

The information contained in this document (the 'Information') has been prepared by Legal & General Investment Management Limited, and/or its affiliates ('Legal & General', 'we' or 'us'). Such Information is the property and/or confidential information of Legal & General and may not be disclosed by you to any other person without the prior written consent of Legal & General. No party shall have any right of action against Legal & General in relation to the accuracy or completeness of the Information, or any other written or oral information made available in connection with this publication. Any investment advice that we provide to you is based solely on the limited initial information which you have provided to us. No part of this or any other document or presentation provided by us shall be deemed to constitute 'proper advice' for the purposes of the Pensions Act 1995 (as amended). Any limited initial advice given relating to professional services will be further discussed and negotiated in order to agree formal not accept any liability for any indirect, special or consequential loss howsoever caused and on any theory or liability, whether in contract or tort (including negligence) or otherwise, even if Legal & General has been advised of the possibility of such loss.

Third Party Data: Where this document contains third party data ('Third Party Data'), we cannot guarantee the accuracy, completeness or reliability of such Third Party Data and accept no responsibility or liability whatsoever in respect of such Third Party Data.

Publication, Amendments and Updates: We are under no obligation to update or amend the Information or correct any errors in the Information following the date it was delivered to you. Legal & General reserves the right to update this document and/or the Information at any time and without notice. Although the Information contained in this document is believed to be correct as at the time of printing or publication, no assurance can be given to you that this document is complete or accurate in the light of information that may become available after its publication. The Information may not take into account any relevant events, facts or conditions that have occurred after the publication or printing of this document. © 2022 Legal & General Investment Management Limited, authorised and regulated by the Financial Conduct Authority, No. 119272. Registered in England and Wales No. 02091894 with registered office at One Coleman Street, London, EC2R 5AAinvestment guidelines which will form part of written contractual terms between the parties.

Confidentiality and Limitations: Unless otherwise agreed by Legal & General in writing, the Information in this document (a) is for information purposes only and we are not soliciting any action based on it, and (b) is not a recommendation to buy or sell securities or pursue a particular investment strategy; and (c) is not investment, legal, regulatory or tax advice. To the fullest extent permitted by law, we exclude all representations, warranties, conditions, undertakings and all other terms of any kind, implied by statute or common law, with respect to the Information including (without limitation) any representations as to the quality, suitability, accuracy or completeness of the Information. The Information is provided 'as is' and 'as available'. To the fullest extent permitted by law, Legal & General accepts no liability to you or any other recipient of the Information for any loss, damage or cost arising from, or in connection with, any use or reliance on the Information. Without limiting the generality of the foregoing, Legal & General does not accept any liability for any indirect, special or consequential loss howsoever caused and on any theory or liability, whether in contract or tort (including negligence) or otherwise, even if Legal & General has been advised of the possibility of such loss.