

SAS Pension Scheme

ESG Report

31/12/2020

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Scheme Summary

Policy Number:
Statement Date:

IS0008697
31/12/2020

Funds	Holdings	Unit Price	Value	%	Fund Manager ESG Credentials	Engagement & Voting Records
BMO Overseas Equity-Linked UK Gilt Fund	8,758	142.971196	1,252,180	9.37%	Yes	Engagement Only
BMO Overseas Equity-Linked UK Inflation Fund	14,755	133.169051	1,964,943	14.70%	Yes	Engagement Only
BMO UK Equity-Linked Gilt Fund	979	115.571887	113,163	0.85%	Yes	Engagement Only
BMO UK Equity-Linked Inflation Fund	1,513	108.099217	163,550	1.22%	Yes	Engagement Only
Invesco Global Targeted Returns Fund	26,558	97.713295	2,595,088	19.41%	Yes	Voting Only
L&G Life AR Cash Fund	0	100.096322	0	0.00%	Yes	No
L&G Life FABP Fixed Short Duration Fund	2,589	170.645729	441,788	3.30%	Yes	No
L&G Life FABR Fixed Long Duration Fund	1,779	194.127443	345,361	2.58%	Yes	No
L&G Life FABS Real Short Duration Fund	2,958	144.352313	427,054	3.19%	Yes	No
L&G Life FABT Real Long Duration Fund	8,532	171.008023	1,458,996	10.91%	Yes	No
M&G Total Return Credit Investment Fund	15,928	111.653300	1,778,449	13.30%	Yes	Engagement Only
Ninety One Diversified Growth Fund	27,165	104.137499	2,828,892	21.16%	Yes	Yes
Total			13,369,464	100.00%		

Disclaimer:

This report has been designed by Mobius Life to support Pension Schemes with some of the information required to complete their Implementation Statement. This report is not the Scheme's Implementation Statement. The information contained herein is not financial advice or a recommendation to invest. The value of any investment can rise or fall and capital is at risk. The information contained in this report has been provided to Mobius Life by third party Investment Managers regarding their products and Mobius Life Limited accepts no responsibility or liability for its accuracy.

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Fund Manager ESG Credentials

Questions	BMO	Invesco	Legal & General
Do you have an ESG policy that is integrated into the investment process?	Yes	Yes	<p>Yes, across both public and private assets, LGIM has established a fully integrated framework for responsible investing to strengthen long-term returns. This is based on stewardship with impact and collaborative, active research across asset classes. Together, these activities enable LGIM to conduct corporate engagement that drives positive change and to deliver ESG-integrated solutions to clients.</p> <p>We integrate ESG agnostic to asset class or management style (active and index), we aim to benefit the widest set of stakeholders through an end-to-end integrated ESG process and an independent investment stewardship function. All of our investment professionals are empowered to enact positive change.</p>
Do you have a firm ESG rating?	<p>Bank of Montreal (aka BMO Financial Group), our parent company, is rated as follows: MSCI ESG – AA Sustainalytics – 85.9 (out of 100) Robeco SAM – 77 ISS Quality score – 1 (1 being best, 10 being worst) CDP Climate Score – 7</p>	<p>Yes, Invesco has the following ratings (all for 2020): MSCI: A Sustainalytics: 26.3 VigeoEiris: 39</p>	<p>Legal & General is recognised as a leader by influential ESG rating agencies. Legal & General is currently rated as follows:</p> <ul style="list-style-type: none"> • AA (leader) by MSCI ESG Ratings • Low Risk (3rd percentile of global insurers) by Sustainalytics • Leader (top 10%) by State Street Investor Stewardship Group <ul style="list-style-type: none"> • Included in FTSE4Good • Listed in World Benchmarking Alliance • Green Star Status for GRESB (Real Estate and Infrastructure Investments) <ul style="list-style-type: none"> • Bloomberg Gender Equality. <p>In addition, Legal & General has formed a long term partnership with the University of Edinburgh to establish the Advanced Care Research Centre which aims to improve the understanding of care in later life and revolutionise how it is delivered.</p>
Please provide your UNPRI survey scores	<p>2020 scores: Strategy & Governance: A+ Listed Equity - Incorporation: A+ Listed Equity - Active Ownership: A+ Fixed Income - SSA: A Fixed Income - Corporate Financial: A Fixed Income - Corporate Non-Financial: A Private Equity: A Property: B</p>	<p>2020 scores: Strategy & Governance: A+ Listed Equity - Incorporation: A+ Listed Equity - Active Ownership: A Fixed Income - SSA: A+ Fixed Income - Corporate Financial: A Fixed Income - Corporate Non-Financial: A+ Fixed Income - Securitised: A Property: A</p>	<p>2020 scores: Strategy & Governance: A+ Listed Equity - Incorporation: A+ Listed Equity - Active Ownership: A+ Fixed Income - SSA: A+ Fixed Income - Corporate Financial: A Fixed Income - Corporate Non-Financial: A Property: A</p>
Do you have a Climate Change policy that is integrated into the investment process?	Yes	Yes	<p>Yes, climate change risks are manifold and vary across asset classes and investment horizons. To tackle this issue in even more depth, we have entered into a strategic partnership with a leading energy consultancy, with which we jointly created a bespoke, investor-focused model – 'Destination'. This is designed to analyse different scenarios for how the energy system is likely to evolve over the next 35 years, and the implications long-term investors.</p> <p>Destination is designed to inform our long-term investment decisions, by enabling us to model the risks of the transition to a low-carbon world under different scenarios, making choices in the lowest-cost and most efficient way.</p>

<p>Are Senior Management accountable for ESG or Climate Change risks?</p>	<p>Yes, for example, senior management will have workplace diversity targets incorporated in their objectives</p>	<p>Yes, at investment level, the importance we place on ESG has led us to launch structural governance oversight, comprising a Corporate Responsibility Committee (CRC), the Corporate Responsibility Committee Working Group, and ESG Regional Working Groups. The ESG Regional working groups consist of: EMEA ESG working group, NA ESG working group and AP ESG working group.</p> <p>Our Corporate Responsibility Committee (CRC) is comprised of members of the executive leadership team. The committee drives the strategy, oversight and governance of our internal programs, which will include progress against climate change, demonstrating Invesco's broad executive leadership commitment to responsible investment. The CRC provides direction to Invesco's investment and corporate stewardship leaders on core ESG and CSR topics, participation in industry advocacy and policy efforts, charitable and community organisations to enhance our impact in sustainable global efforts. Local and Global management teams, including regional managing directors, report into the Global Corporate Responsibility Committee for matters related to ESG and CSR.</p>	<p>The Investment Stewardship team is responsible for developing and carrying out LGIM's investment stewardship and responsible investment activities, including the management of climate-based initiatives such as the Climate Impact Pledge.</p> <p>ESG integration, however, means that every investment decision is taken, challenged and managed using the additional lens of scrutiny of ESG, agnostic to asset class or management style. It is a clearly held view across LGIM that the only way to genuinely achieve full ESG integration is for every investment professional to be considered an ESG expert.</p>
<p>Do you have a dedicated team that considers ESG and Climate Change related factors?</p>	<p>Yes</p>	<p>Yes</p>	<p>Yes, when building the Investment Stewardship team, we deliberately hired members with diverse experience and expertise across the spheres of investment stewardship and responsible investment. The result is a strong and cohesive group of professionals who possess complementary skills and experience including stewardship, fund management, responsible investment, financial analysis, corporate governance, ESG, sustainability, public policy and regulation. This ensures that from the outset the team is well-positioned to understand and keep abreast of the latest regulatory and industry developments.</p>
<p>Do you rely on any third parties to provide ESG and Climate Change related analysis/research?</p>	<p>We utilise a wide range of service providers across our business, including MSCI ESG, Institutional Shareholder Services (ISS), Investment Association's Institutional Voting Information Service (IVIS), broker research, proxy insight, Sustainalytics, Bloomberg and Non-Governmental Organisations (NGOs). Our research is also informed by our networks that may provide briefings and publications, including the UN PRI, International Corporate Governance Network (ICGN) and Asian Corporate Governance Association (ACGA).</p> <p>We are currently in the process of selecting a new, additional data provider that will specifically enable us to deepen our analysis of climate change risks. In addition, we are in the process of selecting a partner to enable rolling out our SDG income stream mapping to client portfolios.</p>	<p>Yes - Sustainalytics, MSCI ESG Research, Truvalue Labs, ISS Climate Solutions, Vivid Economics and sell side research.</p> <p>For proxy voting analysis, the company uses ISS, Glass Lewis and IVIS (the latter for UK equities). For business involvement screening, Invesco uses ISS Ethix, Sustainalytics and MSCI ESG Research.</p>	<p>Yes - Bloomberg, Boardex, CDP, HSBC, InfluenceMap, ISS, IVIS, Maplecroft, MSCI, Refinitiv (formerly Thomson Reuters), RepRisk, Sustainalytics, Trucost</p>
<p>Do you create your own ESG or Climate Change related scores?</p>	<p>Yes, we apply our own in-house ESG scoring system, often using market ESG data inputs.</p>	<p>Yes</p>	<p>Yes</p>

<p>Does your company have a policy on equality and diversity in the workplace?</p>	<p>We have a global diversity and inclusion working group focusing on race, gender, orientation, age and social background. We have set up targets for a gender-balanced population in which 40-60% of our employees are female and 40-60% are male. We also participate in a number of industry initiatives such as Girls Who Invest, The Diversity Project and we are a signatory to the 30% Club.</p>	<p>Yes</p>	<p>LGIM is an award winning company, we are committed to delivering the right products and solutions to our clients and we believe the key to our success is our people.</p> <p>Steered by the Executive team, diversity and inclusion is embedded in our culture from the way we recruit, develop and connect with employees, to how we steward responsible investing through ESG. To show our commitment to making diversity and inclusion part of everything we do, the role of Head of Inclusion & Culture was created in 2018. Colette Comerford was appointed to the role with responsibility for driving the evolution and continuous improvement of LGIM's culture, diversity and inclusion objectives, working closely with the executive team, our Senior HR team, LEGIT (Legal & General Inclusion team) and L&G's Group Diversity and Inclusion team.</p>
<p>Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?</p>	<p>Yes, we provide an annual review of our Responsible Investment practice, annual impact reports for our responsible funds, quarterly updates and ad hoc (c. monthly) investment viewpoints.</p>	<p>Yes, Invesco publishes an annual Climate Change report, and a quarterly ESG report for some funds. Moreover, Invesco can provide its clients, upon request, a standard ESG report based on third party ESG scores. Typically, it takes two to three weeks to turn a portfolio level ESG report around.</p>	<p>Yes, monthly, quarterly and annually</p>
<p>Do ESG related factors get considered with respect to performance management of investment companies and funds?</p>	<p>Yes, the Global Equities team considers ESG factors directly in the analysis of the business model and in the assessment of management quality and flex assumptions and discount rates based on these factors where appropriate. To flag key ESG risks and opportunities, the Global Equities team works with the RI team and an important data source that we use MSCI ESG Research ratings and analysis. The MSCI ESG approach identifies key issues by industry for each company and rates companies on social, environmental and governance performance both in absolute terms and relative to their specific industry.</p>	<p>ESG issues are deemed as an essential component of a fund manager's overall investment responsibilities. At Invesco's Henley investment centre, there are two formalised processes that monitor and challenge fund managers on their ESG approach:</p> <p>Formalised ESG portfolio monitoring, 'ESG reviews', are conducted by Invesco's ESG team. This is a rigorous semi-annual process and includes meeting with the fund managers and analysts to review the portfolio from an ESG perspective. This ensures a circular process for identifying flags and monitoring of improvements over time.</p> <p>The investment centre's Chief Investment Officer (CIO) challenge process is a formal review meeting (minimum annual) held between its CIO and each fund manager. Prior to the meeting, the Henley-based Investment Oversight team prepares a detailed review of a portfolio managed by the fund manager. This includes a full breakdown of the ESG performance using Sustainalytics and ISS data, such as the absolute ESG performance of the fund, relative performance to benchmarks, stock exposed to severe controversies, top and bottom ESG performers, carbon intensity and trends. The Henley ESG team review the ESG data and develop stock specific ESG questions. The ESG performance of the fund is reviewed in this meeting, with the CIO using data and the stock specific questions to analyse the fund manager's level of ESG integration.</p>	<p>Yes, we continue to invest and extend ESG data analytics and internal modelling processes. We have enhanced how we provide ESG information across Global Fixed Income, and how analysts form an assessment of an issuer's ESG profile. Our ESG tools now capture an extensive range of key metrics, of those specifically related to climate we use metrics ranging from carbon emissions, water and waste management, supply chain and environmental policies and controls which enable us to evaluate how issuers are responding to environmental challenges. In addition, our tool incorporates data on 'green revenues' to highlight the percentage of revenues that relate to intrinsically 'green' activities.</p>
<p>Are you signatories of the FRC UK Stewardship Code or equivalent?</p>	<p>Yes</p>	<p>Yes, Invesco's Henley Investment Centre is a signatory and supporter of the FRC's Stewardship Code, achieving Tier 1 status for its approach to stewardship</p>	<p>Yes</p>

Fund Manager ESG Credentials

Questions	M&G	Ninety One
Do you have an ESG policy that is integrated into the investment process?	Yes	Yes
Do you have a firm ESG rating?	Yes	Yes
Please provide your UNPRI survey scores	2020 scores: Strategy & Governance: A+ Listed Equity - Incorporation: A+ Listed Equity - Active Ownership: A+ Fixed Income - SSA: A+ Fixed Income - Corporate Financial: A+ Fixed Income - Corporate Non-Financial: A+ Fixed Income - Securitised: A Property: A Infrastructure: A+	2020 scores: Strategy & Governance: A+ Listed Equity - Incorporation: A+ Listed Equity - Active Ownership: A+ Fixed Income - SSA: A+ Fixed Income - Corporate Financial: A+ Fixed Income - Corporate Non-Financial: A+ Private Equity: A Infrastructure: A+
Do you have a Climate Change policy that is integrated into the investment process?	Yes	Yes, we have firm wide initiatives as to how we approach climate change, and we also integrate ESG factors into all of our investment processes - these differ by investment team/capability.

<p>Are Senior Management accountable for ESG or Climate Change risks?</p>	<p>Yes</p>	<p>Yes</p>
<p>Do you have a dedicated team that considers ESG and Climate Change related factors?</p>	<p>Yes</p>	<p>Yes</p>
<p>Do you rely on any third parties to provide ESG and Climate Change related analysis/research?</p>	<p>Yes, we have built on the existing ESG support available to investment teams through the following third party providers:</p> <ul style="list-style-type: none"> • MSCI ESG Research • ISS • ISS Proxy Exchange <p>Other data sources include:</p> <ul style="list-style-type: none"> • Sustainalytics: ESG Research • Eikon: ESG Research • RepRisk: ESG Research <p>With regards to carbon intensity, we currently use:</p> <ol style="list-style-type: none"> 1. The MSCI Carbon Portfolio Analytics tool, which allows us to analyse the carbon-related risks and characteristics within a chosen portfolio, in comparison to the carbon-related risks and characteristics of its benchmark. 2. Once portfolio carbon exposures have been assessed, the next step is to stress test portfolios for different climate change scenarios. For part of this analysis, we participated, alongside other leading investors, in a pilot scheme convened by the UN Environment Programme – Finance Initiative (UNEP FI) to develop a tool to conduct these stress tests in portfolios across Equities, Fixed Income and Real Estate. 3. We have also been examining other scenario analysis tools to understand their methodologies and identify which is most useful when analysing M&G's holdings, including offerings from providers such as 427, CarbonWise and PACTA. 	<p>Yes - CDP, Urgentum, MSCI, RepRisk, Sustainalytics, etc.</p>
<p>Do you create your own ESG or Climate Change related scores?</p>	<p>Yes</p>	<p>Yes</p>

<p>Does your company have a policy on equality and diversity in the workplace?</p>	<p>Yes</p>	<p>Yes</p>
<p>Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?</p>	<p>Yes, quarterly commentary is provided in QFRs</p>	<p>Yes, annually within our Stewardship report and various investment strategy reports</p>
<p>Do ESG related factors get considered with respect to performance management of investment companies and funds?</p>	<p>Yes</p>	<p>Yes</p>
<p>Are you signatories of the FRC UK Stewardship Code or equivalent?</p>	<p>Yes</p>	<p>Yes</p>

Engagement

Activity	BMO Overseas Equity-Linked UK Gilt Fund	BMO Overseas Equity-Linked UK Inflation Fund	BMO UK Equity-Linked Gilt Fund
How many engagements have you had with companies in the past 12 months?	2262 (BMO have provided this information at firm wide level.)	2262 (BMO have provided this information at firm wide level.)	2262 (BMO have provided this information at firm wide level.)
How many engagements were made regarding climate change?	H1 2020 Climate Change: 16.59% Environmental Stewardship: 4.61%	H1 2020 Climate Change: 16.59% Environmental Stewardship: 4.61%	H1 2020 Climate Change: 16.59% Environmental Stewardship: 4.61%
How many engagements were made regarding board diversity?	Business Ethics: 1.38% Human Rights: 0.46%	Business Ethics: 1.38% Human Rights: 0.46%	Business Ethics: 1.38% Human Rights: 0.46%
How many engagements were made regarding waste reduction?	Labour Standards: 7.37% Public Health: 1.38%	Labour Standards: 7.37% Public Health: 1.38%	Labour Standards: 7.37% Public Health: 1.38%
How many engagements were made regarding financials?	Corporate Governance: 68.20%	Corporate Governance: 68.20%	Corporate Governance: 68.20%
How many engagements were made regarding other issues?	H2 2020 Climate Change: 28.00% Environmental Stewardship: 10.40% Business Conduct: 3.20% Human Rights: 2.40% Labour Standards: 18.40% Public Health: 4.00% Corporate Governance: 33.60%	H2 2020 Climate Change: 28.00% Environmental Stewardship: 10.40% Business Conduct: 3.20% Human Rights: 2.40% Labour Standards: 18.40% Public Health: 4.00% Corporate Governance: 33.60%	H2 2020 Climate Change: 28.00% Environmental Stewardship: 10.40% Business Conduct: 3.20% Human Rights: 2.40% Labour Standards: 18.40% Public Health: 4.00% Corporate Governance: 33.60%
	Please note that figures have been rounded to the nearest percentage and therefore may not add up to exactly 100%. Statistics reflect engagement conducted for our global universe.	Please note that figures have been rounded to the nearest percentage and therefore may not add up to exactly 100%. Statistics reflect engagement conducted for our global universe.	Please note that figures have been rounded to the nearest percentage and therefore may not add up to exactly 100%. Statistics reflect engagement conducted for our global universe.
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 (BMO have provided this information at firm wide level.)	Active private engagement on specific issues (BMO have provided this information at firm wide level.)	Active private engagement on specific issues (BMO have provided this information at firm wide level.)
Please discuss some of the key engagements and outcomes from the last 12 months.	<p>Barclays PLC Committed to align the entire financing portfolio to the goals of the Paris Agreement, and to regularly report on progress. As the first international bank with such a bold commitment, along with a rather large fossil fuel financing book, this commitment shows clear climate leadership. We have engaged the company on their environmental and climate risk management practices for their lending portfolio in the past.</p> <p>Credit Suisse Group AG Published the bank's results for the climate-alignment test, an initiative facilitated by the Swiss Federal Office for the Environment. This is a major step for the bank that has been lagging its Swiss and international peers in climate risk reporting. This is also relevant for the bank's TCFD reporting, which we have been engaging on for a while.</p> <p>HSBC Holdings PLC Replied to the Workforce Disclosure Initiative's (WDI) annual survey. The WDI is a multi-stakeholder initiative calling for enhanced workforce data that allows investors to better assess companies' workforce initiatives and engage on specific topics. The WDI has been sending out an annual survey since 2017. The participation is an important step to overall enhance management of workforce-related issues.</p> <p>(BMO have provided this information at firm wide level.)</p>	<p>Barclays PLC Committed to align the entire financing portfolio to the goals of the Paris Agreement, and to regularly report on progress. As the first international bank with such a bold commitment, along with a rather large fossil fuel financing book, this commitment shows clear climate leadership. We have engaged the company on their environmental and climate risk management practices for their lending portfolio in the past.</p> <p>Credit Suisse Group AG Published the bank's results for the climate-alignment test, an initiative facilitated by the Swiss Federal Office for the Environment. This is a major step for the bank that has been lagging its Swiss and international peers in climate risk reporting. This is also relevant for the bank's TCFD reporting, which we have been engaging on for a while.</p> <p>HSBC Holdings PLC Replied to the Workforce Disclosure Initiative's (WDI) annual survey. The WDI is a multi-stakeholder initiative calling for enhanced workforce data that allows investors to better assess companies' workforce initiatives and engage on specific topics. The WDI has been sending out an annual survey since 2017. The participation is an important step to overall enhance management of workforce-related issues.</p> <p>(BMO have provided this information at firm wide level.)</p>	<p>Barclays PLC Committed to align the entire financing portfolio to the goals of the Paris Agreement, and to regularly report on progress. As the first international bank with such a bold commitment, along with a rather large fossil fuel financing book, this commitment shows clear climate leadership. We have engaged the company on their environmental and climate risk management practices for their lending portfolio in the past.</p> <p>Credit Suisse Group AG Published the bank's results for the climate-alignment test, an initiative facilitated by the Swiss Federal Office for the Environment. This is a major step for the bank that has been lagging its Swiss and international peers in climate risk reporting. This is also relevant for the bank's TCFD reporting, which we have been engaging on for a while.</p> <p>HSBC Holdings PLC Replied to the Workforce Disclosure Initiative's (WDI) annual survey. The WDI is a multi-stakeholder initiative calling for enhanced workforce data that allows investors to better assess companies' workforce initiatives and engage on specific topics. The WDI has been sending out an annual survey since 2017. The participation is an important step to overall enhance management of workforce-related issues.</p> <p>(BMO have provided this information at firm wide level.)</p>

Voting

Activity	BMO Overseas Equity-Linked UK Gilt Fund	BMO Overseas Equity-Linked UK Inflation Fund	BMO UK Equity-Linked Gilt Fund
Do you conduct your own votes?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
Do you use a third party to vote on your behalf?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
How many votes were proposed across the underlying companies in the fund?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
How many times did you vote in favour of management?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
How many times did you vote against management?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
How many votes did you abstain from?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
Please discuss some of the key votes and outcomes from the last 12 months.	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund

Other	BMO Overseas Equity-Linked UK Gilt Fund	BMO Overseas Equity-Linked UK Inflation Fund	BMO UK Equity-Linked Gilt Fund
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Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Not available	Not available	Not available
What is the target turnover rate for the portfolio?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
What was the actual turnover rate over the last 12 months?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund

Engagement

Activity	BMO UK Equity-Linked Inflation Fund	Invesco Global Targeted Returns Fund	L&G Life AR Cash Fund
How many engagements have you had with companies in the past 12 months?	2262 (BMO have provided this information at firm wide level.)	Invesco does not currently track engagements at a fund level	Not applicable for this fund
How many engagements were made regarding climate change?	<p>H1 2020 Climate Change: 16.59% Environmental Stewardship: 4.61% Business Ethics: 1.38% Human Rights: 0.46% Labour Standards: 7.37% Public Health: 1.38% Corporate Governance: 68.20%</p> <p>H2 2020 Climate Change: 28.00% Environmental Stewardship: 10.40% Business Conduct: 3.20% Human Rights: 2.40% Labour Standards: 18.40% Public Health: 4.00% Corporate Governance: 33.60%</p> <p>Please note that figures have been rounded to the nearest percentage and therefore may not add up to exactly 100%. Statistics reflect engagement conducted for our global universe.</p>	Invesco does not currently track engagements at a fund level	Not applicable for this fund
How many engagements were made regarding board diversity?		Invesco does not currently track engagements at a fund level	Not applicable for this fund
How many engagements were made regarding waste reduction?		Invesco does not currently track engagements at a fund level	Not applicable for this fund
How many engagements were made regarding financials?		Invesco does not currently track engagements at a fund level	Not applicable for this fund
How many engagements were made regarding other issues?		Invesco does not currently track engagements at a fund level	Not applicable for this fund
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 (BMO have provided this information at firm wide level.)	Standard period engagement with companies Active public engagement on specific issues	Not applicable for this fund
Please discuss some of the key engagements and outcomes from the last 12 months.	<p>Barclays PLC Committed to align the entire financing portfolio to the goals of the Paris Agreement, and to regularly report on progress. As the first international bank with such a bold commitment, along with a rather large fossil fuel financing book, this commitment shows clear climate leadership. We have engaged the company on their environmental and climate risk management practices for their lending portfolio in the past.</p> <p>Credit Suisse Group AG Published the bank's results for the climate-alignment test, an initiative facilitated by the Swiss Federal Office for the Environment. This is a major step for the bank that has been lagging its Swiss and international peers in climate risk reporting. This is also relevant for the bank's TCFD reporting, which we have been engaging on for a while.</p> <p>HSBC Holdings PLC Replied to the Workforce Disclosure Initiative's (WDI) annual survey. The WDI is a multi-stakeholder initiative calling for enhanced workforce data that allows investors to better assess companies' workforce initiatives and engage on specific topics. The WDI has been sending out an annual survey since 2017. The participation is an important step to overall enhance management of workforce-related issues.</p> <p>(BMO have provided this information at firm wide level.)</p>	<p>Total SA Climate Action 100+ company Climate strategy and related shareholder proposals at AGM</p> <p>This call was focused on Total's new climate commitment (announced May 5th 2020). This was the result of months of discussions with Climate Action 100+ investors and 1-1 engagements with shareholders, including Invesco. The new commitment demonstrates that the board and management are now 'on board' with having long term and more ambitious climate commitments; it also signals the importance the company places with working with and listening to its shareholders (25% of shareholders base as part of CA100+). As a result of the above the ESG team recommended voting against the alternative shareholder climate change proposal (which was filed before Total made its new commitment). We will continue to engage and hold the company accountable for the commitments it has made, and over time to encourage a more ambitious and demanding approach.</p>	Not applicable for this fund

Voting

Activity	BMO UK Equity-Linked Inflation Fund	Invesco Global Targeted Returns Fund	L&G Life AR Cash Fund
Do you conduct your own votes?	Not applicable for this fund	Yes, Invesco views proxy voting as an integral part of its investment management responsibilities. The proxy voting process at Invesco focuses on protecting clients' rights and promoting governance structures and practices that reinforce the accountability of corporate management and boards of directors to shareholders. Voting matters are assessed on a case-by-case basis by Invesco's respective investment professionals considering the unique circumstances affecting companies, regional best practices and our goal of maximizing long-term value creation for our clients. The voting decision lies with our asset managers with input and support from our Global ESG team and Proxy Operations functions. Our portfolio managers review voting items based on their individual merits and retain full discretion on vote execution conducted through our proprietary proxy voting platform. Our proprietary voting platform facilitates implementation of voting decisions and rationales across global investment teams. Our proxy voting philosophy, governance structure and process are designed to ensure that proxy votes are cast in accordance with clients' best interests.	Not applicable for this fund
Do you use a third party to vote on your behalf?	Not applicable for this fund	No, Invesco may supplement its internal research with information from third-parties, such as proxy advisory firms. Globally Invesco leverages research from Institutional Shareholder Services Inc. ("ISS") and Glass Lewis ("GL") and we use the Investment Association IVIS in the UK for research for UK securities. Invesco generally retains full and independent discretion with respect to proxy voting decisions. ISS and GL both provide research reports, including vote recommendations, to Invesco and its asset managers. Invesco also retains ISS to assist with receipt of proxy ballots and vote execution for use through our proprietary voting platform as well as ISS vote disclosure services in Canada, the UK and Europe.	Not applicable for this fund
How many votes were proposed across the underlying companies in the fund?	Not applicable for this fund	347	Not applicable for this fund
How many times did you vote in favour of management?	Not applicable for this fund	94.42%	Not applicable for this fund
How many times did you vote against management?	Not applicable for this fund	5.58%	Not applicable for this fund
How many votes did you abstain from?	Not applicable for this fund	0.57%	Not applicable for this fund
Please discuss some of the key votes and outcomes from the last 12 months.	Not applicable for this fund	<p>British American Tobacco PLC 30/04/2020 Management Proposal: Approve remuneration report Management recommendation: For ISS recommendation: Against, as this proposal because CEO Jack Bowles was granted a 9.5% salary increase for FY2020, from FY2020, the new CFO's LTIP award has been increased to 400% of salary, up from 250% of salary previously (albeit on a lower salary rate than his predecessor). IVZ vote: For Summary: The ESG team met BAT to better understand the company's new 'reduced harm' product commitments and get updates on the related regulatory environment. The meeting also covered the remuneration changes for the CFO and CEO (covered in upcoming AGM items) as well as the company's COVID-19 actions. The investment team supported the remuneration policy having received this additional context on the reasons for the changes.</p>	Not applicable for this fund

Other	BMO UK Equity-Linked Inflation Fund	Invesco Global Targeted Returns Fund	L&G Life AR Cash Fund
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<p>Do you monitor the carbon emission levels or similar of the underlying companies in the fund?</p>	<p>Not available</p>	<p>Climate change is topic that we have been actively engaging on with many companies for several years and we have examples of progress being made. ESGintel is a proprietary tool built by Invesco's Global ESG research team in collaboration with our Technology, Strategy, Innovation and Planning (SIP) team providing ESG insights, metrics, data points and direction of change. ESGintel provides users with an internal rating, a rating trend, and a rank in sector using the GICS sectors. The approach takes a sector materiality focus to select indicators to ensure a targeted focus on the issues that matter most for sustainable value creation and risk management. This provides a holistic view on how a company's value chain is impacted in different ways by various ESG topics, which each individually have around 3-4 supporting data points. ESGintel has carbon emission data at investee company level built into the platform.</p> <p>These data points are then classified by sector or regional relative performance at the indicator level. In addition, machine learning algorithms and extrapolations are used to ensure broad coverage, in the absence of coverage data, using a process by which statistical proxies are created in place of missing data and an estimate ESG score is assigned to an indicator. Ratings on a scale of 1-5 are calculated at the overall company, topic and indicator levels to facilitate a focus on higher risk company-specific issues. In addition to the individual rating the momentum (trend) highlights changes to the rating over time. ESGintel is housed in a proprietary Invesco ESGintel platform which is available to all Invesco employees.</p>	<p>Not applicable for this fund</p>
<p>What is the target turnover rate for the portfolio?</p>	<p>Not applicable for this fund</p>	<p>In keeping with the Multi Asset team's two to three year investment horizon, over the long term, the turnover of investment ideas is expected to be approximately in a range of 30%-40% per annum. However, please note that the investment team does not target any specific turnover level for a portfolio. Consequently, the level of turnover in any one year will be a function of a number of factors, including the volatility of the market, the performance of portfolio holdings and the frequency of the generation of new investment ideas. This may mean that turnover may vary considerably from one year to the next. However, the investment team accepts that it is good investment practice to try and keep the level of turnover to the minimum, whilst at the same time recognising that this should not at any time act as a deterrent to efficient management.</p>	<p>Not applicable for this fund</p>
<p>What was the actual turnover rate over the last 12 months?</p>	<p>Not applicable for this fund</p>	<p>The turnover rate is not meaningful for this strategy under an unconstrained, macro-driven investment approach. The portfolio invests in a diverse type of financial instruments, including extensive use of derivative contracts, whose positions may be rolled over upon contract expiry. As such, the investment team does not target nor monitor any specific turnover rate of financial instruments in the portfolio. The average turnover of investment ideas within the portfolio is estimated to be approximately in a range of 30%-40% per annum.</p>	<p>Not applicable for this fund</p>

Engagement

Activity	L&G Life FABP Fixed Short Duration Fund	L&G Life FABR Fixed Long Duration Fund	L&G Life FABS Real Short Duration Fund
How many engagements have you had with companies in the past 12 months?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
How many engagements were made regarding climate change?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
How many engagements were made regarding board diversity?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
How many engagements were made regarding waste reduction?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
How many engagements were made regarding financials?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
How many engagements were made regarding other issues?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
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	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
Please discuss some of the key engagements and outcomes from the last 12 months.	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund

Voting

Activity	L&G Life FABP Fixed Short Duration Fund	L&G Life FABR Fixed Long Duration Fund	L&G Life FABS Real Short Duration Fund
Do you conduct your own votes?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
Do you use a third party to vote on your behalf?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
How many votes were proposed across the underlying companies in the fund?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
How many times did you vote in favour of management?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
How many times did you vote against management?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
How many votes did you abstain from?	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund
Please discuss some of the key votes and outcomes from the last 12 months.	Not applicable for this fund	Not applicable for this fund	Not applicable for this fund

Other	L&G Life FABP Fixed Short Duration Fund	L&G Life FABR Fixed Long Duration Fund	L&G Life FABS Real Short Duration Fund
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Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Not provided	Not provided	Not provided
What is the target turnover rate for the portfolio?	Not provided	Not provided	Not provided
What was the actual turnover rate over the last 12 months?	Not provided	Not provided	Not provided

Engagement

Activity	L&G Life FABT Real Long Duration Fund	M&G Total Return Credit Investment Fund	Ninety One Diversified Growth Fund
How many engagements have you had with companies in the past 12 months?	Not applicable for this fund	4	16
How many engagements were made regarding climate change?	Not applicable for this fund	1 (25%)	40%
How many engagements were made regarding board diversity?	Not applicable for this fund	0 (0%)	20%
How many engagements were made regarding waste reduction?	Not applicable for this fund	2 (50%)	5%
How many engagements were made regarding financials?	Not applicable for this fund	0 (0%)	20%
How many engagements were made regarding other issues?	Not applicable for this fund	1 (25%)	15%
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	Not applicable for this fund	Active private engagement with clients on specific issues	Sending bespoke letters to companies
Please discuss some of the key engagements and outcomes from the last 12 months.	Not applicable for this fund	<p>BASF</p> <p>Aim: encourage BASF to agree to a net zero target by 2050 for scope 3 and a reduction in scope 1 and 2 emissions by 2030.</p> <p>Main challenges: the company explained that all the easy efficiencies in emissions had already been achieved and from here any future gains would require capital expenditure rather than operating expenditure. Using hydrogen is one option to create heat which could save up to 10% of emissions and buying electricity from renewable sources of power would reduce emissions by a further 7%. However, net zero is not currently achievable and the company is reluctant to commit to a target for which it cannot see a pathway to achieving. Our message to the company is that it needs to be more ambitious in its thinking for emission reductions, otherwise there may be consequences for the Board.</p> <p>ABInBev</p> <p>Aim: ABInBev to set Scope 1-3 medium term reduction targets, post 2025; and set a Net Zero target for 2050 or sooner.</p> <p>Main challenges: the heat required in the brewing process (currently using up two thirds of energy requirements) and the packaging which represents 40% of scope 3 emissions. Increased use of returnable glass bottles and recycling plastic would significant reduce emissions. The company is clearly aware of its challenges and is working on the solutions. We await their next ESG report to be published in February to see if any new targets are published, then we will decide whether to re-engage with the company.</p>	<p>Moncler</p> <p>Moncler is a global luxury apparel and lifestyle brand. Earlier this year, we engaged with Moncler in collaboration with Ninety One's 4Factor equity team. We voted against two aspects of their proxy vote. Firstly, the proposal to create a mechanism for increased voting rights and secondly, for outgoing board members to present a list of replacement candidates. We felt these two proposals were not for the benefit of minority shareholders and minority members of the board. We acknowledge the excellent work CEO Remo Ruffini has achieved in building Moncler into the company that it is today, and we view his significant stake in the business as a positive factor which largely aligns his interest with other shareholders. However, differential voting rights is out of line with industry best practice and creating a mechanism that gives large holders disproportionate voting shares enables Mr Ruffini to increase his control without contributing more capital to the business. With the company talking more about the potential for M&A we want to ensure that the ability for minority shareholders to vote on strategically important decisions is retained in the future. While the March meeting was cancelled as a result of the COVID-19 pandemic, the proposed amendment did not feature in the June meeting agenda, so it would appear that collective shareholder resistance has been effective so far, but we will continue to monitor for future proposed amendments or a resurfacing of this proposal from the board.</p> <p>(Ninety One have provided this information at firm wide level.)</p>

Voting

Activity	L&G Life FABT Real Long Duration Fund	M&G Total Return Credit Investment Fund	Ninety One Diversified Growth Fund
Do you conduct your own votes?	Not applicable for this fund	Not applicable for this fund	Yes
Do you use a third party to vote on your behalf?	Not applicable for this fund	Not applicable for this fund	No
How many votes were proposed across the underlying companies in the fund?	Not applicable for this fund	Not applicable for this fund	1794
How many times did you vote in favour of management?	Not applicable for this fund	Not applicable for this fund	1513 (92.88%)
How many times did you vote against management?	Not applicable for this fund	Not applicable for this fund	65 (3.99%)
How many votes did you abstain from?	Not applicable for this fund	Not applicable for this fund	38 (2.33%)
Please discuss some of the key votes and outcomes from the last 12 months.	Not applicable for this fund	Not applicable for this fund	Not provided

Other	L&G Life FABT Real Long Duration Fund	M&G Total Return Credit Investment Fund	Ninety One Diversified Growth Fund
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<p>Do you monitor the carbon emission levels or similar of the underlying companies in the fund?</p>	<p>Not provided</p>	<p>Yes, carbon intensity exposures are monitored on a quarterly basis, however the measure is fairly limited for securitised assets</p>	<p>Yes</p>
<p>What is the target turnover rate for the portfolio?</p>	<p>Not provided</p>	<p>No target</p>	<p>No target</p>
<p>What was the actual turnover rate over the last 12 months?</p>	<p>Not provided</p>	<p>-6.61%</p>	<p>10.58% Turnover calculation: ((Purchases of securities + sales of securities) - (issue of units + cancellation of units) x 100)/Average TNA for month</p>