



PUBLIC TRANSPARENCY REPORT

2023

Royal London Group

Generated 15-12-2023

About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2023 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

Disclaimers

Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

Data accuracy

This document presents information reported directly by signatories in the 2023 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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SENIOR LEADERSHIP STATEMENT (SLS)

SENIOR LEADERSHIP STATEMENT

SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

Royal London is a purpose-driven mutual. We believe that investing is about more than generating financial returns. As an investor entrusted with managing £147bn of customers' assets (as at 31 December 2022), we are committed to helping build financial resilience while also acting and investing responsibly in the interests of our members, customers and society at large.

Responsible investment is integrated into all aspects of our investment processes, from our investment beliefs to selecting and monitoring our asset managers, setting strategic asset allocations and managing investments across different asset classes.

Our Investment Beliefs

We believe:

- That our customers want to know where their money is invested and the impact that it has on the world around them.
- That the best future for our customers is one where we collectively achieve the goals of the Paris Agreement.

- That actions taken up to 2030 will determine the shape of the century to come.
- That we should act as a responsible steward of the assets we invest in on behalf of our customers who rely on us to adopt a responsible investment approach.
- That change is best driven by being an active owner and engaging with companies where there are issues to be addressed.

- That allocating capital based solely on market weight is not a responsible investment strategy for a responsible investor committed to ESG integration.

We invest our customers' money for the long term and we take the same approach with the companies we invest in. Central to our stewardship approach, through our asset managers, is engaging with investee companies on a broad range of issues supporting our aims of enhancing returns for our customers while delivering benefits for society as a whole.

Engagement is a fundamental part of our strategy. As well as engaging with the companies we invest in, we also actively engage with asset managers, policymakers, regulators and other stakeholders to influence positive outcomes. We support this through collaboration with industry bodies, including the Association of British Insurers and the Investment Association, as well as through groups focused on key stewardship issues such as Institutional Investors Group on Climate Change and Financing a Just Transition Alliance, among others.

The Royal London Group comprises the Royal London Mutual Insurance Society Limited (RLMIS) and its subsidiary undertakings. RLAM, our internal asset manager, manages over 95% of our assets. Although RLMIS and RLAM are both part of the Royal London Group, RLAM is managed separately and is overseen by its own Board. RLAM undertakes stewardship and engagement activity on our behalf as well as on behalf of its own external customers and clients, and has provided an update on its responsible investment activities through its own PRI report.

We have committed to reduce the emissions from our investment portfolio by 50% by 2030 (tCO₂e/\$m invested) as part of the transition to net zero by 2050.

These commitments are based on the expectation that governments and policymakers will deliver on the commitments to achieve the goal of the Paris Agreement and that the required actions do not contravene our fiduciary duty to our members and customers. Our commitment includes assets that are controlled by RLMIS and are managed on its behalf by RLAM and excludes segregated mandates managed by RLAM on behalf of its external clients.

Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
 - refinement of ESG analysis and incorporation
 - stewardship activities with investees and/or with policymakers
 - collaborative engagements
 - attainment of responsible investment certifications and/or awards

Engagement:

For our listed equity and corporate fixed income assets, our strategy is focused on engagement as a primary tool to reaching real-world carbon emission reductions. We believe engagement, particularly with our highest-emitting investee companies, will have a more significant real-world impact than divestment. Because of this, we accept that our financed emissions may rise in the short term, but believe that this is the best course of action to achieve our climate commitments and reduce emissions in the long term. During 2022, Royal London Asset Management (RLAM), our internal asset manager who manage over 95% of our assets, engaged with 393 investee companies on 604 separate occasions, through which 22 ESG topics were addressed and 45% was climate-related engagement. As well as engagement through our asset managers, we collaborate with other institutional investors, both as an asset owner and through our asset manager subsidiary, RLAM. By actively collaborating with industry bodies on key climate-related issues and using our position to influence others, we are able to further Royal London's positive impact. Over 2022, we led and participated in a number of industry forums and initiatives focused on minimising and mitigating the effects of the climate crisis.

Developing climate solutions:

In 2022, Royal London Mutual Insurance Society Limited (RLMIS) seeded the RLAM Sustainable Growth Fund which aims to invest in companies with strong ESG credentials and provide attractive investment returns for customers.

These companies will be assessed and selected by RLAM based on their ESG and financial analysis, with minimum thresholds to ensure investments score highly on both. The fund has been specifically built around sustainability so that ESG considerations are fully integrated at the outset. RLAM also launched a Global Equity Transition Fund in October 2022 that aims to support companies to move to a more sustainable world, which, again, RLMIS seeded. The Fund seeks to invest in corporates that can make a material contribution to the sustainability transition by either transitioning their business to a more sustainable path or enabling other businesses to transition, or both.

Building internal capabilities:

In order to achieve our Purpose and play our part in moving fairly to a sustainable world, sustainability must be embedded across our entire business.

Over 2022, building internal capabilities has been a key focus. Our Group Sustainability and Stewardship (GSS) team was established in January 2022 and is staffed by eight full-time colleagues. This function is led by the CEO Office Director and is accountable for:

- providing insight and expertise for teams across the Group on sustainability issues and solutions;
- challenging the status quo, to help ensure sustainability is embedded in everything we do;
- building capability across the Group so that all colleagues understand how their roles can support the Group's sustainability ambitions;
- supporting effective stewardship of our products, creating long-term value for customers and members;
- strengthening our external voice to effect greater positive real-world change, in collaboration with relevant business areas; and
- supporting industry-wide change through collaboration with initiatives targeting a Just Transition to a low-carbon economy.

Our Sustainability Learning Programme, developed in collaboration with the University of Edinburgh Business School, was agreed and approved in 2021 and delivered over 2022.

Over 140 colleagues across six learning cohorts attended this eight week programme. We have also continued to develop our internal Eco Champions colleague network which, by the end of 2022, had grown to over 400 members. This voluntary network helps to build a culture of sustainability across Royal London by educating, engaging and inspiring colleagues.

We held a Sustainability Summit at the end of November 2022 with a weeklong focus on how everyone in the business can play their part in moving fairly to a sustainable world.

Achievements:

In 2022 RLMIS achieved signatory status of the UK Stewardship Code 2020 for the first time. We also achieved 'A-' for our climate change disclosure awarded by CDP, an independent body, up from a 'C' in 2021.

Section 3. Next steps

- What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

We recognise there is a lot of work to do and that we, as a business and industry, have more to do. Building the trust and confidence of our customers remains a priority. We want to be clear about our purpose-driven ambition and the choices we make on their behalf, but also clear on the progress we have made and the challenges we face. To sustain and deepen this engagement with customers, we will seek and listen to their feedback, adapting our strategy and areas of focus so that we remain relevant and responsive to their needs and aspirations.

- We will stay focused on embedding sustainability across our entire business by building colleague capabilities through formal education and supporting our Eco Champions network.
- We will continue to review our approach to asset allocation and portfolio construction, seeking opportunities to increase real-world positive impact through our allocations and investment decisions, while continuing to support customer outcomes with prudent management of investment risk.
- We will actively engage with the largest contributors to our carbon footprint and work with our peers, policymakers and the companies we invest in to play our part in enabling the transition to a low-carbon economy.
- We will continue to work collaboratively with industry bodies to support and influence policymakers to address the systemic change needed to decarbonise the economy sustainably.

- We will continue to be a strong advocate for a Just Transition to help ensure social issues are considered and addressed as society transitions to net zero.
 - We will demonstrate our commitment by reporting our activities and progress transparently, including against our climate commitments.
 - We are currently developing our Climate Transition Plan, which will provide detail on our journey to achieving our climate commitments and the associated timeframes.
- We will continue to refine our approach to risk management through aggregating climate risk reporting from across the business into a biannual Climate Risk Report and expanding our climate scenario analysis to assess the impact climate-related risks will have on our longer-term business strategy.
 - Our data strategy will be developed further as we consider our methodology for calculating and assessing forward-looking metrics as well as our portfolio emissions in line with best practice.

Progress will not be linear, but we will not lose sight of the destination. Royal London will remain dedicated to building financial resilience and moving fairly to a sustainable world, advocating for progressive policies and aspiring to effect change that aligns with the best available climate science and the needs of our customers.

Section 4. Endorsement

'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.

Name

Daniel Cazeaux

Position

Group Chief Financial Officer

Organisation's Name

Royal London Group

● A

'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.

○ B

ORGANISATIONAL OVERVIEW (OO)

ORGANISATIONAL INFORMATION

REPORTING YEAR

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2022

SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries?

- (A) Yes
- (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2.1	CORE	OO 2	OO 2.2	PUBLIC	Subsidiary information	GENERAL

Are any of your organisation's subsidiaries PRI signatories in their own right?

- (A) Yes
- (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2.2	CORE	OO 2.1	N/A	PUBLIC	Subsidiary information	GENERAL

How many subsidiaries of your organisation are PRI signatories in their own rights?

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10

List any subsidiaries of your organisation that are PRI signatories in their own right and indicate if the responsible investment activities of the listed subsidiaries will be reported in this submission.

(1) Yes, the responsible investment activities of this subsidiary will be included in this report

(2) No, the responsible investment activities of this subsidiary will be included in their separate report

(A) Signatory name: Royal London Asset Management

ASSETS UNDER MANAGEMENT

ALL ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 3	N/A	PUBLIC	All asset classes	GENERAL

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 176,826,300,000.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 171,052,380,000.00

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 0.00

ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	>10-50%	>0-10%
(B) Fixed income	>10-50%	>0-10%
(C) Private equity	0%	0%
(D) Real estate	>0-10%	0%
(E) Infrastructure	0%	0%
(F) Hedge funds	0%	0%
(G) Forestry	0%	0%

(H) Farmland	0%	0%
(I) Other	>10-50%	>0-10%
(J) Off-balance sheet	0%	0%

(I) Other - (1) Percentage of Internally managed AUM - Specify:

Absolute Return (inc Cash)
Multi Asset
specialist

(I) Other - (2) Percentage of Externally managed AUM - Specify:

Absolute Return (inc Cash)
Multi Asset
specialist

ASSET BREAKDOWN: EXTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.1	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Externally managed assets	GENERAL

Provide a further breakdown of your organisation's externally managed listed equity and/or fixed income AUM.

	(1) Listed equity	(2) Fixed income - SSA	(3) Fixed income - corporate	(4) Fixed income - securitised	(5) Fixed income - private debt
(A) Active	>75%	0%	>50-75%	0%	0%
(B) Passive	>10-50%	>10-50%	>10-50%		

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2	CORE	OO 5, OO 5.1	SAM 3, SAM 8	PUBLIC	Asset breakdown: Externally managed assets	GENERAL

Provide a breakdown of your organisation's externally managed AUM between segregated mandates and pooled funds or investments.

	(1) Segregated mandate(s)	(2) Pooled fund(s) or pooled investment(s)
(A) Listed equity - active	0%	>75%
(B) Listed equity - passive	0%	>75%
(C) Fixed income - active	0%	>75%
(D) Fixed income - passive	0%	>75%

ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 LE	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed listed equity	GENERAL

Provide a further breakdown of your internally managed listed equity AUM.

(A) Passive equity	>10-50%
(B) Active – quantitative	0%
(C) Active – fundamental	>75%
(D) Other strategies	0%

ASSET BREAKDOWN: INTERNALLY MANAGED FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 FI	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed fixed income	GENERAL

Provide a further breakdown of your internally managed fixed income AUM.

(A) Passive – SSA >50-75%

(B) Passive – corporate 0%

(C) Active – SSA 0%

(D) Active – corporate >10-50%

(E) Securitised 0%

(F) Private debt 0%

ASSET BREAKDOWN: INTERNALLY MANAGED REAL ESTATE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 RE	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed real estate	GENERAL

Provide a further breakdown of your internally managed real estate AUM.

(A) Retail >10-50%

(B) Office >10-50%

(C) Industrial >10-50%

(D) Residential >0-10%

(E) Hotel	>0-10%
(F) Lodging, leisure and recreation	>0-10%
(G) Education	0%
(H) Technology or science	0%
(I) Healthcare	>0-10%
(J) Mixed use	0%
(K) Other	>0-10%

(K) Other - Specify:

This includes car show rooms and garages

MANAGEMENT BY PRI SIGNATORIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 6	CORE	OO 5	N/A	PUBLIC	Management by PRI signatories	GENERAL

What percentage of your organisation’s externally managed assets are managed by PRI signatories?

>75%

GEOGRAPHICAL BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

AUM in Emerging Markets and Developing Economies

(A) Listed equity	(2) >0 to 10%
(B) Fixed income – SSA	(1) 0%
(C) Fixed income – corporate	(2) >0 to 10%
(G) Real estate	(1) 0%

STEWARDSHIP

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

	(1) Listed equity - active	(2) Listed equity - passive	(3) Fixed income - active	(4) Fixed income - passive	(6) Real estate	(11) Other
(A) Yes, through internal staff	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(B) Yes, through service providers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(C) Yes, through external managers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) We do not conduct stewardship	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?

	(1) Listed equity - active	(2) Listed equity - passive
(A) Yes, through internal staff	<input type="checkbox"/>	<input type="checkbox"/>
(B) Yes, through service providers	<input type="checkbox"/>	<input type="checkbox"/>
(C) Yes, through external managers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) We do not conduct (proxy) voting	<input type="checkbox"/>	<input type="checkbox"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9.1	CORE	OO 9	PGS 10.1, PGS 31	PUBLIC	Stewardship: (Proxy) voting	GENERAL

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

Percentage of your listed equity holdings over which you have the discretion to vote

(A) Listed equity – active	(1) 0%
(B) Listed equity - passive	(1) 0%

ESG INCORPORATION

INTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

For each internally managed asset class, does your organisation incorporate ESG factors into your investment decisions?

	(1) Yes, we incorporate ESG factors into our investment decisions	(2) No, we do not incorporate ESG factors into our investment decisions
(A) Listed equity - passive	<input checked="" type="radio"/>	<input type="radio"/>
(C) Listed equity - active - fundamental	<input checked="" type="radio"/>	<input type="radio"/>
(E) Fixed income - SSA	<input checked="" type="radio"/>	<input type="radio"/>
(F) Fixed income - corporate	<input checked="" type="radio"/>	<input type="radio"/>
(J) Real estate	<input checked="" type="radio"/>	<input type="radio"/>
(V) Other: Absolute Return (inc Cash) Multi Asset specialist	<input checked="" type="radio"/>	<input type="radio"/>

EXTERNAL MANAGER SELECTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 12	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager selection	1

For each externally managed asset class, does your organisation incorporate ESG factors when selecting external investment managers?

	(1) Yes, we incorporate ESG factors when selecting external investment managers	(2) No, we do not incorporate ESG factors when selecting external investment managers
(A) Listed equity - active	<input checked="" type="radio"/>	<input type="radio"/>
(B) Listed equity - passive	<input checked="" type="radio"/>	<input type="radio"/>
(C) Fixed income - active	<input checked="" type="radio"/>	<input type="radio"/>
(D) Fixed income - passive	<input checked="" type="radio"/>	<input type="radio"/>
(K) Other: Absolute Return (inc Cash) Multi Asset specialist	<input checked="" type="radio"/>	<input type="radio"/>

EXTERNAL MANAGER APPOINTMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 13	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager appointment	1

For each externally managed asset class, does your organisation incorporate ESG factors when appointing external investment managers?

	(1) Yes, we incorporate ESG factors when appointing external investment managers	(2) No, we do not incorporate ESG factors when appointing external investment managers
(A) Listed equity - active	<input checked="" type="radio"/>	<input type="radio"/>
(B) Listed equity - passive	<input checked="" type="radio"/>	<input type="radio"/>
(C) Fixed income - active	<input checked="" type="radio"/>	<input type="radio"/>
(D) Fixed income - passive	<input checked="" type="radio"/>	<input type="radio"/>
(K) Other: Absolute Return (inc Cash) Multi Asset specialist	<input checked="" type="radio"/>	<input type="radio"/>

EXTERNAL MANAGER MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 14	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager monitoring	1

For each externally managed asset class, does your organisation incorporate ESG factors when monitoring external investment managers?

	(1) Yes, we incorporate ESG factors when monitoring external investment managers	(2) No, we do not incorporate ESG factors when monitoring external investment managers
(A) Listed equity - active	<input checked="" type="radio"/>	<input type="radio"/>
(B) Listed equity - passive	<input checked="" type="radio"/>	<input type="radio"/>
(C) Fixed income - active	<input checked="" type="radio"/>	<input type="radio"/>
(D) Fixed income - passive	<input checked="" type="radio"/>	<input type="radio"/>
(K) Other: Absolute Return (inc Cash) Multi Asset specialist	<input checked="" type="radio"/>	<input type="radio"/>

ESG IN OTHER ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 15	CORE	OO 11, OO 12–14	N/A	PUBLIC	ESG in other asset classes	1

Describe how your organisation incorporates ESG factors into the following asset classes.

Internally managed
(C) Other

ESG factors are incorporated through our Investment Philosophy and Beliefs and our Strategic Asset Allocation frameworks. Ongoing monitoring is undertaken through our Asset Manager Oversight Framework and Stewardship meetings with our internal manager.

Externally managed
(F) Other

External managers are requested to answer ESG questions as part of our selection and mandate process. Ongoing monitoring is undertaken through our Asset Manager Oversight framework and Stewardship meetings with external managers.

ESG STRATEGIES

LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 LE	CORE	OO 11	OO 17.1 LE, LE 12	PUBLIC	Listed equity	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active listed equity?

Percentage out of total internally managed active listed equity

(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	>10-50%

(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	>50-75%
(H) None	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 LE	CORE	OO 17 LE	LE 9	PUBLIC	Listed equity	1

What type of screening does your organisation use for your internally managed active listed equity assets where a screening approach is applied?

Percentage coverage out of your total listed equity assets where a screening approach is applied

(A) Positive/best-in-class screening only	0%
(B) Negative screening only	>75%
(C) A combination of screening approaches	>10-50%

FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 FI	CORE	OO 5.3 FI, OO 11	Multiple, see guidance	PUBLIC	Fixed income	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active fixed income?

(2) Fixed income - corporate

(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	>75%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	>10-50%
(H) None	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 FI	CORE	OO 17 FI	N/A	PUBLIC	Fixed income	1

What type of screening does your organisation use for your internally managed active fixed income where a screening approach is applied?

(2) Fixed income - corporate

(A) Positive/best-in-class screening only	0%
(B) Negative screening only	>75%
(C) A combination of screening approaches	>0-10%

ESG/SUSTAINABILITY FUNDS AND PRODUCTS

LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

(A) Yes, we market products and/or funds as ESG and/or sustainable

Provide the percentage of AUM that your ESG and/or sustainability-marketed products or funds represent:

>10-50%

- (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- (C) Not applicable; we do not offer products or funds

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	OO 18	OO 18.2	PUBLIC	Labelling and marketing	1

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

(A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications

Provide the percentage of AUM that your labelled and/or certified products and/or funds represent:

>10-50%

- (B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.2	CORE	OO 18.1	N/A	PUBLIC	Labelling and marketing	1

Which ESG/RI certifications or labels do you hold?

- (A) Commodity type label (e.g. BCI)
- (B) GRESB
- (C) Austrian Ecolabel (UZ49)
- (D) B Corporation
- (E) BREEAM
- (F) CBI Climate Bonds Standard
- (G) DDV-Nachhaltigkeitskodex-ESG-Strategie
- (H) DDV-Nachhaltigkeitskodex-ESG-Impact

- (I) EU Ecolabel
- (J) EU Green Bond Standard
- (K) Febelfin label (Belgium)
- (L) Finansol
- (M) FNG-Siegel Ecolabel (Germany, Austria and Switzerland)
- (N) Greenfin label (France)
- (O) Grüner Pfandbrief
- (P) ICMA Green Bond Principles
- (Q) ICMA Social Bonds Principles
- (R) ICMA Sustainability Bonds Principles
- (S) ICMA Sustainability-linked Bonds Principles
- (T) Kein Verstoß gegen Atomwaffensperrvertrag
- (U) Le label ISR (French government SRI label)
- (V) Luxflag Climate Finance
- (W) Luxflag Environment
- (X) Luxflag ESG
- (Y) Luxflag Green Bond
- (Z) Luxflag Microfinance
- (AA) Luxflag Sustainable Insurance Products
- (AB) National stewardship code**
Specify:

UK Stewardship Code 2020

- (AC) Nordic Swan Ecolabel
- (AD) Other SRI label based on EUROSIF SRI Transparency Code (e.g. Novethic)
- (AE) People's Bank of China green bond guidelines
- (AF) RIAA (Australia)
- (AG) Towards Sustainability label (Belgium)
- (AH) Other**
Specify:

RSM Responsible fund

PASSIVE INVESTMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 19	CORE	OO 5.3 FI, OO 11	LE 8, FI 10	PUBLIC	Passive investments	1

What percentage of your total internally managed passive listed equity and/or fixed income passive AUM utilise an ESG index or benchmark?

Percentage of AUM that utilise an ESG index or benchmark

(A) Listed equity - passive	>0-10%
(B) Fixed income - passive	0%

THEMATIC BONDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 20	CORE	OO 17 FI	FI 15, FI 17	PUBLIC	Thematic bonds	1

What percentage of your total environmental and/or social thematic bonds are labelled by the issuers in accordance with industry-recognised standards?

Percentage of your total environmental and/or social thematic bonds labelled by the issuers

(A) Green or climate bonds	>50-75%
(B) Social bonds	>0-10%
(C) Sustainability bonds	>0-10%
(D) Sustainability-linked bonds	>10-50%
(E) SDG or SDG-linked bonds	0%
(F) Other	0%
(G) Bonds not labelled by the issuer	0%

SUMMARY OF REPORTING REQUIREMENTS

SUMMARY OF REPORTING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Confidence Building Measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(T) External manager selection, appointment and monitoring (SAM) – listed equity - active	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(U) External manager selection, appointment and monitoring (SAM) – listed equity - passive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(V) External manager selection, appointment and monitoring (SAM) – fixed income - active	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(W) External manager selection, appointment and monitoring (SAM) – fixed income - passive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

SUBMISSION INFORMATION

REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- (A) Publish as absolute numbers
- (B) Publish as ranges

POLICY, GOVERNANCE AND STRATEGY (PGS)

POLICY

RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

- (A) Overall approach to responsible investment
- (B) Guidelines on environmental factors
- (C) Guidelines on social factors
- (D) Guidelines on governance factors
- (E) Guidelines on sustainability outcomes
- (F) Guidelines tailored to the specific asset class(es) we hold
- (G) Guidelines on exclusions
- (H) Guidelines on managing conflicts of interest related to responsible investment
- (I) Stewardship: Guidelines on engagement with investees
- (J) Stewardship: Guidelines on overall political engagement
- (K) Stewardship: Guidelines on engagement with other key stakeholders
- (L) Stewardship: Guidelines on (proxy) voting
- (M) Other responsible investment elements not listed here
- (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- (A) **Specific guidelines on climate change (may be part of guidelines on environmental factors)**
- (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- (C) Specific guidelines on other systematic sustainability issues
- (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

Which elements of your formal responsible investment policy(ies) are publicly available?

- (A) **Overall approach to responsible investment**

Add link:

<https://www.royallondon.com/siteassets/site-docs/about-us/stewardship/rlmis-stewardship-report-2022.pdf>

- (B) Guidelines on environmental factors
- (C) Guidelines on social factors
- (D) Guidelines on governance factors

- (E) **Guidelines on sustainability outcomes**

Add link:

<https://www.royallondon.com/globalassets/docs/shared/investment/rlmis-entity-level-tcf-d-report-2022.pdf>

- (F) **Specific guidelines on climate change (may be part of guidelines on environmental factors)**

Add link:

<https://www.royallondon.com/globalassets/docs/shared/investment/rlmis-entity-level-tcf-d-report-2022.pdf>

- (J) **Guidelines on exclusions**

Add link:

<https://www.royallondon.com/siteassets/site-docs/about-us/stewardship/rlmis-stewardship-report-2022.pdf>

- (L) **Stewardship: Guidelines on engagement with investees**

Add link:

<https://www.royallondon.com/siteassets/site-docs/about-us/stewardship/rlmis-stewardship-report-2022.pdf>

- (O) **Stewardship: Guidelines on (proxy) voting**

Add link:

<https://adviser.royallondon.com/globalassets/docs/shared/investment/pdf5on0020-our-voting-principles.pdf>

- (Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Which elements are covered in your organisation’s policy(ies) or guidelines on stewardship?

- (A) Overall stewardship objectives
- (B) Prioritisation of specific ESG factors to be advanced via stewardship activities
- (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- (D) How different stewardship tools and activities are used across the organisation
- (E) Approach to escalation in stewardship
- (F) Approach to collaboration in stewardship
- (G) Conflicts of interest related to stewardship
- (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- (I) Other
- (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 6	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Does your policy on (proxy) voting include voting principles and/or guidelines on specific ESG factors?

- (A) Yes, it includes voting principles and/or guidelines on specific environmental factors
- (B) Yes, it includes voting principles and/or guidelines on specific social factors
- (C) Yes, it includes voting principles and/or guidelines on specific governance factors
- (D) Our policy on (proxy) voting does not include voting principles or guidelines on specific ESG factors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 7	CORE	OO 9	N/A	PUBLIC	Responsible investment policy elements	2

Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

- (A) We have a publicly available policy to address (proxy) voting in our securities lending programme
- (B) We have a policy to address (proxy) voting in our securities lending programme, but it is not publicly available
- (C) We rely on the policy of our external service provider(s)
- (D) We do not have a policy to address (proxy) voting in our securities lending programme
- (E) Not applicable; we do not have a securities lending programme

RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

Combined AUM coverage of all policy elements

- (A) Overall approach to responsible investment
 - (B) Guidelines on environmental factors
 - (C) Guidelines on social factors
 - (D) Guidelines on governance factors
- (7) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 9	CORE	PGS 2	N/A	PUBLIC	Responsible investment policy coverage	1

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

AUM coverage

(A) Specific guidelines on climate change

(1) for all of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

(A) Listed equity

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%

(11) 100%

(B) Fixed income

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%

(11) 100%

(D) Real estate

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%

(11) 100%

(I) Other

GOVERNANCE

ROLES AND RESPONSIBILITIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

- (A) Board members, trustees, or equivalent
- (B) Senior executive-level staff, or equivalent

Specify:

The Group Chief Executive Officer (Group CEO), is responsible for the day-to-day management of the Group, achieving our Purpose and implementing our strategy and objectives in line with our culture, values and ethical and regulatory standards. The Group Chief Financial Officer (Group CFO) has regulatory responsibility for managing the financial risks arising from climate change.

- (C) Investment committee, or equivalent

Specify:

The Board Investment Committee supports the Board in discharging its responsibilities regarding investment matters, in a manner consistent with our Investment Philosophy and Beliefs.

- (D) Head of department, or equivalent

Specify department:

The Head of Group Stewardship and Sustainability is the business owner of our stewardship and engagement, voting, and exclusions policies.

- (E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

	(1) Board members, trustees, or equivalent	(2) Senior executive-level staff, investment committee, head of department, or equivalent
(A) Overall approach to responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Guidelines on environmental, social and/or governance factors	<input type="checkbox"/>	<input type="checkbox"/>
(C) Guidelines on sustainability outcomes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(H) Guidelines on exclusions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Stewardship: Guidelines on engagement with investees	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(M) Stewardship: Guidelines on (proxy) voting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)	<input type="radio"/>	<input type="radio"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1 – 6

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

(A) Yes

Describe how you do this:

Over 2022 we led and participated in a number of industry forums and initiatives focused on minimising and mitigating the effects of the climate crisis. For example:

Association of British Insurers (ABI)

- Participant in Climate Change Steering and Working Groups
- Financial and Corporate Reporting Committee
- Response to the call for evidence on the independent review of the Government's approach to delivering net zero

The Institutional Investors Group on Climate Change (IIGCC)

- Utilities Sector Working Group (Co-chair)
- Contributed to a letter for European utilities on energy security and affordability considerations and proactive lobbying for climate policies
- Provided feedback to sector methodologies (banks, oil and gas)

Climate Financial Risk Forum(CFRF)

- Data, Disclosures and Metrics Working Group participant
- Chaired and contributed to various workstreams from the working groups resulting in publications including the guidelines on climate solutions, managing legal risks of disclosures and a carbon primer for financial institutions

Institute and Faculty of Actuaries (IFoA)

- Net Zero Portfolio Alignment Working Group participant
- Life Climate Change Working Party
- 'Net Zero Investing – A Beginner's Guide' published
- Co-presented at the annual IFoA Life Conference on 'Practical Insights into the Implementation of Climate Risk Management'

To provide greater structure around our engagement activity, we are currently developing our Policy & Industry Engagement Strategy alongside and in alignment with our Climate Transition Plan.

- (B) No
- (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

- (A) Internal role(s)

Specify:

Group Sustainability and Stewardship focus on embedding best practice sustainability and stewardship activity throughout the business. The Investment Solutions team support delivery of responsible investment and climate change outcomes through the investment proposition. The Investment Office undertakes ongoing monitoring of responsible investment factors across RLAM and external asset managers.

- (B) External investment managers, service providers, or other external partners or suppliers
- (C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?

- (A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent
- (B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Explain why: (Voluntary)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?

- (A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicate whether these responsible investment KPIs are linked to compensation

- (1) KPIs are linked to compensation
- (2) KPIs are not linked to compensation as these roles do not have variable compensation
- (3) KPIs are not linked to compensation even though these roles have variable compensation

Describe: (Voluntary)

The Group's performance management and reward incentive framework focuses activities on delivery of key strategic objectives. The framework includes a Short-Term Incentive Plan (STIP), which applies to most colleagues, and a Long-Term Incentive Plan (LTIP), which applies to certain members of the Group Executive. Both are based on a set of targets and metrics approved and monitored by the Remuneration Committee. These targets and metrics are based on 'scorecards' that track the delivery of key outcomes, including our climate commitments. Details can be found in the Directors' remuneration report: (hyperlink to annual reports).

The STIP and LTIP are grounded in our Purpose and help instil behaviours that contribute to delivering sustainable value for our members and other stakeholders. Performance with regards to Royal London's Climate Change Strategy and Diversity & Inclusion Strategy accounted for 10% and 5% of the 2021 LTIP scorecard respectively. In 2022, 'Sustainability' was added to the LTIP scorecard with the following measures and an overall impact on the scorecard of 10%:

- Reduce portfolio CO2e emissions in line with the timeframe outlined by our climate commitments;
- Progress in securing a Just Transition plan from our top investee companies by the end of 2024; and
- Implement agreed Diversity and Inclusion Strategy Progressing against our climate ambitions was included in our 2022 STIP scorecard as one of the "Major projects".

Major projects has an overall 15% weight. Sustainability is also integrated into a number of other measures within the STIP scorecard, such as assessment of risk and risk culture.

- (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

- (A) Any changes in policies related to responsible investment
- (B) Any changes in governance or oversight related to responsible investment
- (C) Stewardship-related commitments
- (D) Progress towards stewardship-related commitments
- (E) Climate-related commitments
- (F) Progress towards climate-related commitments
- (G) Human rights-related commitments
- (H) Progress towards human rights-related commitments
- (I) Commitments to other systematic sustainability issues
- (J) Progress towards commitments on other systematic sustainability issues
- (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

- (A) Yes, including all governance-related recommended disclosures
 - (B) Yes, including all strategy-related recommended disclosures
 - (C) Yes, including all risk management-related recommended disclosures
 - (D) Yes, including all applicable metrics and targets-related recommended disclosures
 - (E) None of the above
- Add link(s):

<https://www.royallondon.com/siteassets/site-docs/investments/investing-for-a-sustainable-future-2021.pdf>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

- (A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- Add link(s):

<https://www.royallondon.com/siteassets/site-docs/about-us/annual-reports/annual-report-and-accounts-2022-rl.pdf>

- (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- (C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

STRATEGY

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

Which elements do your organisation-level exclusions cover?

- (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services
- (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- (D) Exclusions based on our organisation's climate change commitments
- (E) Other elements
- (F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

How does your responsible investment approach influence your strategic asset allocation process?

(A) We incorporate ESG factors into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

(B) We incorporate climate change–related risks and opportunities into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

(C) We incorporate human rights–related risks and opportunities into our assessment of expected asset class risks and returns

(D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns

- (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- (F) Not applicable; we do not have a strategic asset allocation process

STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

(1) Listed equity

(2) Fixed income

(4) Real estate

(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.



(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

- (A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible
- (B) We collaborate on a case-by-case basis
- (C) Other
- (D) We do not join collaborative stewardship efforts

STEWARDSHIP: ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 36	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Escalation	2

For your listed equity holdings, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

(1) Listed equity

(A) Joining or broadening an existing collaborative engagement or creating a new one

(B) Filing, co-filing, and/or submitting a shareholder resolution or proposal

(C) Publicly engaging the entity, e.g. signing an open letter

(D) Voting against the re-election of one or more board directors

(E) Voting against the chair of the board of directors, or equivalent, e.g. lead independent director

(F) Divesting

(G) Litigation

(H) Other

(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings

o

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 37	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship: Escalation	2

For your corporate fixed income assets, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

- (A) **Joining or broadening an existing collaborative engagement or creating a new one**
- (B) Publicly engaging the entity, e.g. signing an open letter
- (C) **Not investing**
- (D) **Reducing exposure to the investee entity**
- (E) **Divesting**
- (F) **Litigation**
- (G) Other
- o (H) In the past three years, we did not use any of the above escalation measures for our corporate fixed income assets

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

- (A) Yes, we engaged with policy makers directly
- (B) **Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI**
- (C) **Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI**
- o (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

- (A) We participated in 'sign-on' letters
- (B) We responded to policy consultations
- (C) We provided technical input via government- or regulator-backed working groups

Describe:

In 2022, as part of the Association of British Insurers (ABI), we responded to the call for evidence on the independent review of the Government's approach to delivering net zero. We also reviewed a draft of the Sustainable Disclosures Regulation and provided feedback to discussions on consultation papers, including defining sustainable and impact investing in public and private markets via the Investment Association. We are a main forum member of the Climate Financial Risk Forum (CFRF), Co-chair of the Institutional Investors Group on Climate Change (IIGCC) Utilities Sector Working Group and a participant the Institute and Faculty of Actuaries (IFoA) Net Zero Portfolio Alignment Working Group.

- (D) We engaged policy makers on our own initiative
- (E) Other methods

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

- (A) We publicly disclosed all our policy positions
- (B) We publicly disclosed details of our engagements with policy makers

Add link(s):

<https://www.royallondon.com/siteassets/site-docs/about-us/annual-reports/annual-report-and-accounts-2022-rl.pdf>

- (C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

CLIMATE CHANGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

Has your organisation identified climate-related risks and opportunities affecting your investments?

(A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

We have determined the most material climate-related risks and opportunities to our business using the identification and assessment processes outlined in the Risk Management section of our TCFD report. These quantitative and qualitative risks are then used to inform our risk management processes.

(B) Yes, beyond our standard planning horizon

(C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

(A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

Climate -related risks are owned by, and integrated into, individual business units across the Group, in our long -term savings, protection and asset management businesses in the UK and Ireland. With support from our Risk function, the management of each business unit and function is accountable for identifying, measuring, reporting, managing, and mitigating all risks relevant to its area of business. This includes the design and operation of suitable internal controls and the allocation of risk and control responsibilities.

This collaborative and decentralised approach helps us to drive consistent climate risk management activities across the business, within agreed risk appetites.

It supports all areas of our business to integrate key climate -related issues into their day-to-day and strategic planning activities. By integrating climate -related financial risks into the Group's overarching risk framework, we are building the appropriate tools and capabilities to understand, monitor and mitigate the impact of these risks.

One of our largest exposures to climate-related risks is the impact these risks may have on the assets we manage for our customers and members.

To help manage these risks, we have embedded climate risk evaluation into our strategic asset allocation process.

Climate-related risks and opportunities are considered across this process by:

- considering our emission reduction targets when setting strategic asset allocation objectives, in addition to optimising investment returns;
- considering climate-related risks when setting risk limits and constraints;
- embedding climate-related risks and opportunities into the approved asset policy and Group's Investment Philosophy, both of which are used when determining the assets which can be part of the strategic asset allocation;
- reviewing the strategic asset allocation against at least two climate change scenarios to understand our exposure to the associated risks; and
- assessing the carbon emissions of the existing and shortlisted strategic asset allocation proposals to determine the impact any change might have on meeting our emission reduction targets.

In 2022 we built on the Climate Biennial Exploratory Scenario (CBES) analysis we voluntarily undertook during 2021, we engaged a third party to build our climate scenario models.

Our analysis sought to identify the systemic impacts of climate change on the real economy and financial markets through interrogating three possible climate pathways:

- Paris orderly – where governments take early policy action to achieve net-zero carbon emissions by 2050.
- Paris disorderly – where governments take late policy action to achieve net-zero carbon emissions by 2050.
- Failed transition – where governments take no action to achieve net-zero carbon emissions.

The results from interrogating our climate pathways suggested that greater temperature rises and/or a disorderly transition could lead to worse economic and social impacts on our business. The model showed the impacts on our capital projections for the Paris orderly and Paris disorderly transitions to be relatively small, with our cover ratio remaining within an acceptable range up to 2027. The Failed Transition showed a more significant adverse impact, but projected capital coverage ratio remained within the target range level. Our scenario analysis provided us with a projection of the change in value across asset classes under different scenarios up to 2060, under our three climate scenarios. This was used to monitor the risk to our capital position over the period to 2027, in line with our medium-term business planning model. The results implied a negative year-on-year impact to the value of all our asset classes, with the most significant effects being observed in the Failed transition scenario.

Ultimately, climate scenario models do not currently capture the full range of impacts that climate change may have on our business. It is for this reason that we use the outputs of our climate scenario modelling in conjunction with our qualitative risk assessment process: to try to capture those risks which may be missed by climate scenario modelling alone.

- (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?

- (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- (B) Yes, using the One Earth Climate Model scenario
- (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
- (D) Yes, using other scenarios**

Specify:

Our 2022 climate scenario analysis built on the Climate Biennial Exploratory Scenario (CBES) analysis we voluntarily undertook during 2021, in which we modelled outcomes from three possible climate pathways based on those developed by the Network for Greening the Financial System (NGFS), as recommended by the Bank of England. We engaged a third party to build our climate scenario models.

Our analysis sought to identify the systemic impacts of climate change on the real economy and financial markets through interrogating three possible climate pathways:

- Paris orderly – where governments take early policy action to achieve net-zero carbon emissions by 2050. Average global warming stabilises at 1.5°C
- Paris disorderly – where governments take late policy action to achieve net-zero carbon emissions by 2050. Average global warming stabilises at 1.5°C
- Failed transition – where governments take no action to achieve net-zero carbon emissions. Average global warming stabilises at 4°C

To understand how investment portfolios might be impacted under each scenario, these scenarios were translated into possible business model impacts using top-down scenario analysis. This was done by:

- determining the level of GHG emissions associated with certain temperature increases;
- mapping this to a set of policy and technology assumptions;
- estimating the financial costs of physical warming;
- using these assumptions and estimated costs to estimate the impact on GDP at a regional level; and
- assessing the likely impact of the GDP change on asset class returns.

- (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

- (A) Yes, we have a process to identify and assess climate-related risks**
- (1) Describe your process

We use different methods to identify and assess the physical and transition risks arising from climate change, including:

- Horizon scanning – we have a range of processes for identifying upcoming and existing climate-related risks, regulations and trends. These include:
 - quarterly regulatory radar – a report on emerging themes (short-, medium- and long-term), in-flight consultations and changes in these themes in the previous quarter. This is owned by the Group Risk and Compliance (GR&C) team.
 - regulatory update newsletter – a regular newsletter compiled by the GR&C team and distributed through our business, which highlights significant regulatory changes, including climate-related regulatory changes.
- emerging and strategic risk forum – a bi-annual gathering of key individuals involved in the management of emerging risks, strategic risks and stress and scenario testing. The output report details the risks identified, an indication of when they might impact our business and who the appointed business owner is.
- technical support team daily scan – a daily scan for any changes in legislation or regulation that could affect any of our UK products, including ESG-related changes. Changes are summarised and directed to the appropriate teams to address. The technical support team tracks items to completion.
- competitors and markets scan – a weekly newsletter that summarises key activity among our competitors and in the market. The newsletter includes a section on 'climate, nature and sustainability'.
- legal and regulatory horizon scanning roles and responsibilities forum – a quarterly gathering to review and, where required, update roles and responsibilities for horizon scanning.
- Climate risk assessments are used to identify physical and transition climate-related risks across the short, medium and long term. This includes:
 - climate scenario modelling – we perform climate change scenario modelling to identify and assess the possible impacts of physical and transition climate-related risks to our business, over a range of potential transition pathways and time horizons. This gives us a quantitative and qualitative assessment of how climate-related risks might impact our business.
 - qualitative risk assessment – we perform further qualitative climate-risk assessment to capture a more holistic view of the risks associated with climate change and how these might materialise and impact our business over different time horizons. This is in part informed by the outputs from our horizon scanning activity and climate scenario modelling.

(2) Describe how this process is integrated into your overall risk management

As climate risk can manifest itself across any of our risk categories, the reporting of climate considerations has been integrated into our Group Risk Management System (RMS). Climate-related risks are owned by, and integrated into, individual business units across the Group, in our long-term savings, protection and asset management businesses in the UK and Ireland using the processes outline above. With support from our Risk function, the management of each business unit and function is accountable for identifying, measuring, reporting, managing, and mitigating all risks relevant to its area of business. This includes the design and operation of suitable internal controls and the allocation of risk and control responsibilities.

This collaborative and decentralised approach helps us to drive consistent climate risk management activities across the business, within agreed risk appetites. It supports all areas of our business to integrate key climate-related issues into their day-to-day and strategic planning activities. By integrating climate-related financial risks into the Group's overarching risk framework, we are building the appropriate tools and capabilities to understand, monitor and mitigate the impact of these risks.

(B) Yes, we have a process to manage climate-related risks

(1) Describe your process

We seek to manage and mitigate our exposure, undertaking risk management actions to reduce both the impact and likelihood of occurrence. We do this

by embedding climate risk management across all of our risk management disciplines. Some examples of how these risks are managed include:

- taking actions towards meeting our portfolio climate commitments in order to manage the transition and physical risks associated with our investments. This includes embedding climate considerations in our investment process, engaging with our asset managers and top-emitting investee companies and using our position in the market to influence real change.
- setting clear strategies and taking actions to reduce our operation and value chain emissions; and

- performing customer sentiment research to understand our customers' top climate-related priorities and ensure that our products and business aligns with these where possible, helping us to meet our customer needs and reduce our reputational risk.

Across all risk categories, our risk management primarily focuses on building capabilities by raising awareness of climate-related risks and sharing best practice for managing these across all business areas.

Some of the initiatives that helped grow our internal capabilities and manage climate-related risks to our business throughout 2022 included:

- the collaborative Group Sustainability and Stewardship Forum;
- climate risk education for key stakeholders; • subject matter support from the Group Sustainability and Stewardship team;
- oversight from Group Risk and Compliance; and • the development of our climate risk reporting strategy, which seeks to aggregate climate risk reporting across our business from 2023.

(2) Describe how this process is integrated into your overall risk management

As climate risk can manifest itself across any of our risk categories, the reporting of climate considerations has been integrated into our Group Risk Management System (RMS). Climate-related risks are owned by, and integrated into, individual business units across the Group, in our long-term savings, protection and asset management businesses in the UK and Ireland using the processes outline above. With support from our Risk function, the management of each business unit and function is accountable for identifying, measuring, reporting, managing, and mitigating all risks relevant to its area of business. This includes the design and operation of suitable internal controls and the allocation of risk and control responsibilities.

The Group Sustainability Oversight Committee (GSOC) supports the GEC in the management of climate risks and opportunities. It supports, oversees and challenges the delivery of the product, investment and operational sustainability goals of the Group, considering both the impact of climate change on Royal London and the impact of Royal London on climate change. Also, the Emerging and Strategic Risk Forum acts as a means to identify, monitor, assess and report emerging and strategic risks, including related climate risks, to the Group Executive Risk Committee. It also supports the Group's stress and scenario testing processes. Consideration of climate risks and opportunities are also integrated into all aspects of our investment processes, from our investment beliefs to selecting and monitoring our asset managers, setting strategic asset allocations and managing investments across different asset classes.

- (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and disclose?

(A) Exposure to physical risk

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used

(2) Metric or variable used and disclosed

- (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.royallondon.com/globalassets/docs/shared/investment/rlmis-entity-level-tcf-report-2022.pdf>

(B) Exposure to transition risk

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used
 - **(2) Metric or variable used and disclosed**
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.royallondon.com/globalassets/docs/shared/investment/rlmis-entity-level-tcf-report-2022.pdf>

(C) Internal carbon price

(D) Total carbon emissions

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - **(3) Metric or variable used and disclosed, including methodology**
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.royallondon.com/globalassets/docs/shared/investment/rlmis-entity-level-tcf-report-2022.pdf>

(E) Weighted average carbon intensity

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - **(3) Metric or variable used and disclosed, including methodology**
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.royallondon.com/globalassets/docs/shared/investment/rlmis-entity-level-tcf-report-2022.pdf>

(F) Avoided emissions

(G) Implied Temperature Rise (ITR)

(H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals

(I) Proportion of assets or other business activities aligned with climate-related opportunities

(J) Other metrics or variables

○ (K) Our organisation did not use or disclose any climate risk metrics or variables affecting our investments during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, did your organisation disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

(A) Scope 1 emissions

- (1) Indicate whether this metric was disclosed, including the methodology
 - (1) Metric disclosed
 - **(2) Metric and methodology disclosed**
- (2) Provide links to the disclosed metric and methodology, as applicable

<https://www.royallondon.com/globalassets/docs/shared/investment/rlmis-entity-level-tcf-report-2022.pdf>

<https://www.royallondon.com/siteassets/site-docs/about-us/annual-reports/annual-report-and-accounts-2022-rl.pdf>

(B) Scope 2 emissions

- (1) Indicate whether this metric was disclosed, including the methodology
 - (1) Metric disclosed
 - **(2) Metric and methodology disclosed**
- (2) Provide links to the disclosed metric and methodology, as applicable

<https://www.royallondon.com/globalassets/docs/shared/investment/rlmis-entity-level-tcf-report-2022.pdf>
<https://www.royallondon.com/siteassets/site-docs/about-us/annual-reports/annual-report-and-accounts-2022-rl.pdf>

(C) Scope 3 emissions (including financed emissions)

- (1) Indicate whether this metric was disclosed, including the methodology
 - (1) Metric disclosed
 - **(2) Metric and methodology disclosed**
- (2) Provide links to the disclosed metric and methodology, as applicable

<https://www.royallondon.com/globalassets/docs/shared/investment/rlmis-entity-level-tcf-report-2022.pdf>
<https://www.royallondon.com/siteassets/site-docs/about-us/annual-reports/annual-report-and-accounts-2022-rl.pdf>

- (D) Our organisation did not disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

- **(A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities**
- (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

- (A) The UN Sustainable Development Goals (SDGs) and targets
- (B) The UNFCCC Paris Agreement**
- (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (E) The EU Taxonomy
- (F) Other relevant taxonomies
- (G) The International Bill of Human Rights

- (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (I) The Convention on Biological Diversity
- (J) Other international framework(s)
- (K) Other regional framework(s)
- (L) Other sectoral/issue-specific framework(s)
- (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2

What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

- (A) Identify sustainability outcomes that are closely linked to our core investment activities
- (B) Consult with key clients and/or beneficiaries to align with their priorities
- (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character
- (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues
- (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
- (F) Understand the geographical relevance of specific sustainability outcome objectives
- (G) Other method
- (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

- (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

CONFIDENCE-BUILDING MEASURES (CBM)

CONFIDENCE-BUILDING MEASURES

APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

How did your organisation verify the information submitted in your PRI report this reporting year?

- (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy
- (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- (G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI
 - (H) We did not verify the information submitted in our PRI report this reporting year

INTERNAL AUDIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 4	CORE	OO 21, CBM 1	N/A	PUBLIC	Internal audit	6

What responsible investment processes and/or data were audited through your internal audit function?

- (A) Policy, governance and strategy
 - Select from dropdown list:
 - (1) Data internally audited
 - (2) Processes internally audited
 - (3) Processes and data internally audited

INTERNAL REVIEW

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

Who in your organisation reviewed the responses submitted in your PRI report this year?

- (A) Board, trustees, or equivalent
- (B) Senior executive-level staff, investment committee, head of department, or equivalent**
 - Sections of PRI report reviewed
 - (1) the entire report**
 - (2) selected sections of the report
 - (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year