



Environmental, Social & Governance Statement

Voting and engagement report

Q3 2025

1 July – 30 September 2025

Executive summary

Responsible Investment (“RI”) is a subject that the East Sussex Pension Fund’s (ESPF or the Fund) Pension Committee (“the Committee”) take seriously. Environmental, social and governance factors are considered throughout the Committee’s decision-making process.

This report sets out voting and engagement activity carried out during the last quarter.

Investment strategy

Generating sustainable long term investment returns is the Fund’s primary objective and it does so by investing across a range of asset classes such as equities, bonds, property, and infrastructure using both active and passive management styles. Asset allocation is expected to be the Fund’s main driver of returns and risk over the long term. The Fund’s [Investment Strategy Statement](#) describes the high-level principles governing the investment decision-making and management of the Fund.

The Fund believe that Responsible Investment (RI) supports the purpose of the Scheme – the provision of retirement income for individuals. RI is an approach to investing that aims to incorporate environmental, social and governance (ESG) factors into investment decisions, to better manage risk and to generate sustainable, long-term returns.

Investment managers

The Fund uses mostly active managed strategies, with the Committee seeking to achieve a balance between cost and return. Active and passive managers have a duty to act as responsible investors and are expected to act as good stewards for the companies they invest in or lend to.

All the Funds’ managers are required to report their engagement activity on a regular basis and exercise the voting rights in relation to the Funds’ investments as far as practical. This report summarises those activities.

Policies and approach

The Fund has policies detailing our Investment Strategy and approach to Responsible Investment. These policies are [available on the Fund’s website](#).

Collaboration

The Fund believes a philosophy of engagement is the most effective approach in addressing ESG concerns and driving long lasting change. To be effective, it is best done in conjunction with other parties. Participation in collaborative engagements enables the Fund to increase its ability to influence positive action among the companies it invests in. By utilizing combined size of investors’ assets makes it harder for companies to dismiss our concerns and does accelerate those companies targeted with making meaningful change to their business practices such as their transition to a sustainable pathway.

East Sussex Pension Fund Engagement

East Sussex Pension Fund Commitments

As an advocate of responsible investment, the Fund is a member of the following organisations:

- Institutional Investors Group on Climate Change (IIGCC)
- Local authority Pension Fund Forum (LAPFF)
- Principles for Responsible Investment (PRI)
- Pensions for Purpose
- UK Sustainable Investment and Finance Association (UKSIF)

In addition, the Fund has committed to reporting under the following initiatives:

- Financial Reporting Council (FRC) Stewardship Code 2020
- Taskforce on Climate Related Financial Disclosure (TCFD).

In addition to being members of these groups the Fund demonstrates its commitment to RI by actively participating via representation in:

- Membership of the IIGCC Corporate Programme Advisory Group

The Funds' Investment Managers will also have a number of memberships which are shown in the report below.

LAPFF Engagement Activity

All [engagement activities completed in Q3 2025 through LAPFF are available here](#)

Sample engagement updates

Coca-Cola - Water

Objective: LAPFF engaged with The Coca-Cola Company in Q3 to understand the basis for recent changes to its 2035 Water Strategy. These changes include the removal of its 100% sustainable sourcing goal for key agricultural ingredients; the extension of its 2023 pledge to improve 60 critical watersheds by 2030 to a less ambitious 2035 deadline with a narrower location-based focus; and the omission of water quality, WASH (Water, Sanitation, and Hygiene), and ecosystem protection from its 2024 environmental goals. This engagement served as an opportunity to continue the dialogue started through the Valuing Water Finance Initiative (VWFI) investor letter sent to Coca-Cola in January 2025. The letter emphasised growing investor focus on water risk management and the urgent need to address supply chain-related water risks.

Achieved: In LAPFF's investor meeting, The Coca Cola Company reiterated that water remains its top priority, citing that since 2015, it has replenished more than 100% of the water it uses in finished products globally, on an aggregate level, to nature and communities. reaching 148% in 2023. However, this headline figure does not address mounting concerns about weaker ESG commitments. LAPFF pressed the point that Coca Cola appears to have rolled back several water-related goals, including the removal of time-bound targets for sustainable agriculture and dropping its commitment to certify all concentrate sites (where the company manufactures the concentrated syrup or beverage base) under the Alliance for Water Stewardship (AWS) Standard by 2025, while also extending other goals, such as watershed restoration and emissions reductions, to 2035. Although the company presented this change as a simplification and refinement of targets and commitments, focusing on areas it can directly control, LAPFF raised concerns that this represents a dilution of ambition, credibility, and accountability from an investor perspective. The Coca-Cola Company highlighted its Foundation's \$40m commitment to WASH (water, sanitation, and hygiene) projects in high-stress areas. While LAPFF recognises this as a positive step, the initiative is limited in scale when set against the company's global water footprint and the significant financial risks posed by the fact that one-third of its facilities are located in high water-stress regions. LAPFF also raised governance concerns, including the combined Chair/ CEO role and the extended tenure of several independent non-executive directors, which risk undermining board independence.

In Progress: While Coca Cola said it would take on board LAPFF's concerns, the company's reliance on "voluntary goals" and its tendency to frame reduced commitments as "evolving" strategies continues to raise concern for the Forum. LAPFF emphasised that water risk is a material financial issue and the need for measurable targets and stronger accountability. The company maintains it has a handle on this through reliance on local assessments, partnerships, and replenishment programmes. In response to LAPFF's question on governance, Coca Cola acknowledged LAPFF's position and committed to consider LAPFF's feedback. The company stated willingness to engage in ongoing dialogue with LAPFF on water strategy, supply chain management, and governance.

[Further information on the Funds activities and polices can be found on our investment page.](#)

Engagement with policy Makers

IIGCC

As a member of IIGCC, policy engagement undertaken in the quarter includes:

How Europe plans to cut 90% emissions by 2040 and what it means for investors

July 2025

In July the European Commission proposed a 2040 EU-wide greenhouse gas (GHG) emission reduction target of 90% against a 1990 baseline: a key milestone between the EU's 2030 emission reduction target of 55% and its goal of net zero by 2050. We take a closer look at the implications of this target for European investors and industry.

Unlike previous climate targets for 2030 and 2050, the proposed 2040 climate target includes several flexibilities to ease the load on European businesses and investors.

The Commission says these are intended to reflect a more pragmatic approach to implementation, and are fundamentally about making a strong business case for investments in the clean transition. They also serve to make the proposal more politically palatable at a time when Brussels is increasingly focused on Europe's industrial competitiveness.

[Read the full article here.](#)

How can the investor appetite be leveraged for an effective Baku to Belem Roadmap?

September 2025

The Baku to Belem Roadmap – promised by COP30 in Brazil this November – is considered vital to scale up the initial USD 300 billion public finance goal agreed at COP29. Our response to the UNFCCC consultation stresses a clear investor appetite to invest in emerging markets and developing economies (EMDE).

After difficult negotiations in Azerbaijan, the “Baku to Belem Roadmap to USD 1.3 trillion” aimed to alleviate concerns from developing countries that the USD 300 billion per year agreed at COP29 is well short of the funding required. It is a welcome step towards delivering finance at scale and a significant opportunity for public and private collaboration.

[Read more in the article here](#)

LAPFF

LAPFF sent a response to the Exposure draft of UK Sustainability Reporting Standards: UK SRS S1 and UK SRS S2. There were concerns with the basis of the framework as it proposed using the model of the International Accounting Standards Board.

LAPFF felt the department was only concerned with the effect of disclosure on vague “users”, when disclosure is also relevant to how the company behaves in first instance as a result of transparency. “Pulling own socks up effect”. Workplace casualties and diversity are good examples.

United Nations Principles of Responsible Investment (UNPRI)

As a member of UNPRI, policy engagement undertaken in the quarter includes:

Global

477 organisations are calling on EU policymakers to preserve the core of the EU sustainability framework. This joint statement has been backed by 132 investors and financial institutions, 87 real-economy companies and 92 other organisations.

The statement emphasises that preserving the key elements of both the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD) is essential to redirect capital flows toward forward-looking technologies and sectors, in alignment with the objectives of the Clean Industrial Deal.

The statement was coordinated by PRI, the European Sustainable Investment Forum (EUROSIF), the Institutional Investors Group on Climate Change (IIGCC), the Corporate Leaders Group (CLG Europe), the Global Reporting Initiative (GRI) and E3G.

Global Investor Statement

To tackle the climate crisis, seven major groups have collaborated to pull together and elevate the best investor guidance on tackling the climate crisis. Together, these groups have formed the Investor Agenda, a common leadership agenda on the climate crisis that is focused on accelerating investor action for a net-zero emissions economy. Since creation, the Fund and half of its fund managers have signed the statement.



[More details around the Global Investor Statement can be found here](#)

Activities and training undertaken directly by the Fund.

The Fund has undertaken the following activities during Quarter 3 of 2025.

Fund manager meetings

During the quarter, the fund met with the below fund managers to discuss areas of concern. Priority areas that are discussed at these meetings are:

- Fund Performance (including risks to the fund and inflationary pressures)
- ESG (including management overview and follow ups to prior period engagements)
- Voting (what happens where votes contradict LAPFF guidelines, and challenge around votes taken)
- Others if applicable (e.g., fossil fuels, carbon intensity, portfolio emissions, and biodiversity)

1. Ruffer	Absolute Return
2. Longview	Equity
3. CBRE	Real Estate
4. Newton	Real Return

Industry meetings, events, and training

- LGC Conference (9th – 11th July)
- Investment Strategy Day (24th July)
- LGC Investment Summit (10th – 12th September)
- Border to Coast Conference (25th – 26th September)

Third party supplier commitments

Along with its investment managers, the Fund also encourages its third-party providers to part take in the industry relevant responsible investments activities and groups, to promote and consider these items. An example of the supplier commitments and activities is provided below

Barnett Waddingham (Fund Actuary)

As our fund actuary, Barnett Waddingham is responsible for performing high level calculations on our behalf, covering areas such as our valuation or IAS19 reports, and analysing the financial costs of risk and uncertainty.

[Barnett Waddingham – Sustainability page available here](#)

Barnett Waddingham is a founding signatory of the Net Zero Investment Consultants Initiative and is a member of the Pensions Climate Risk Industry Group (PCRIG). They also have a net zero pledge, with details on all the above being found under the attached link. BW have been net zero on scope 1 and 2 emissions since 2021.

Hymans (investment advisory service)

Isio is responsible with providing us with investment advice, as well as reporting on our current investment and strategy. They took over from our previous investment advisors (ISIO) at the start of the year.

Responsible Investment Updates can be found here: [Hymans News & Views](#)

Northern Trust (Custodian)

Northern trust is responsible for taking care of the funds cash, alongside the money it has invested.

[Northern Trust - Social Responsibility page - available here](#)

[Northern Trust - Latest Corporate Social responsibility report – available here](#)

Northern trust have made the commitment to be net-zero carbon by 2050

See “Selected memberships and initiatives” page for external engagement.

Eversheds (Lawyers)

Eversheds provide us with legal advice around all matters of the fund.

[Evershed's - sustainability page – available here](#)

Eversheds has committed to reducing its scope 1,2 and 3 emissions by 50% by 2030. In addition, they recently became a founding member of the Net Zero Lawyers Alliance, alongside being the first global law firm to be accredited by the good business charter. This charter is formed of ten commitments including Environmental Responsibility and Diversity & Inclusion

LGPS Pooling

East Sussex are part of the ACCESS pool and all investment managers the fund invests in through the ACCESS pool need to comply with the ACCESS voting guidelines. [Link to Access website here.](#)

[Link to Access Responsible Investment guidelines and summary report here.](#)

Examples of what should be voted for and against below:

Vote for:

- Adoption of Report and Accounts unless Auditors Report is qualified.
- The annual report should include a separate section that describes the work of the Audit Committee.
- All directors should be subject to regular re-election, at least every three years.
- Long term incentive schemes should be based on challenging performance targets over a consecutive period of at least three years. Therefore, performance targets for minimum rewards should be based on at least producing median performance for the industry or average market returns.
- All political donations should be fully disclosed and justified. Any political donations should be subject to a separate vote.

- The company should publish a formal statement setting out its approach to dealing with environmental issues.

Vote against:

- The Report and Accounts are not considered to present a true and fair view of the company's financial position.
- The re-appointment of the auditors where the fees for non-audit work are material and exceed the fee for audit work.
- The election of an executive director, who is not subject to re-election by rotation at least every three years.
- Election of a chairman where the candidate combines the roles of Chairman and Chief Executive, unless there are exceptional circumstances e.g., a temporary arrangement, pending separation of the posts.
- Proposed dividend and special dividends which are not covered by earnings and the company offers no explanation of policy.
- Annual report, where significant environmental risks in relation to the company's activities are not disclosed or reported on or reporting is considered poor or inadequate.

Manager Engagement and Voting Activity

Longview (Active listed equity) Part of Access Pool

Fund Manager collaborate engagement groups - links on page 42

- FRC Stewardship Code 2020
- Institutional Investors Group on Climate Change (IIGCC)
- UK Stewardship Code
- United Nations Principles for Responsible Investment (UNPRI)
- Global Investor Statement

Voting

Number of Voteable meetings	Resolutions voted	Votes for	Votes against	Abstained/ Withheld/ Did not vote	With management	Against management
1	6	3	2	1	3	3

Note: All data displayed is fund specific, not at fund manager level

Engagement

[Longview Partners - Responsible Investment & Engagement Policy](#)

Longview currently send tailored ESG reports to ESPF each Quarter. Anonymised Q3 25 engagement examples provided to us are below:

Company A

In September 2025, Longview held a conference call with Company A’s Associate General Counsel and Head of Investor Relations to follow up on the company’s inclusion in the UN High Commissioner for Human Rights Report. We have engaged with Company A multiple times since December 2023 regarding human rights and reputational risks linked to listings in Israeli settlements in the Occupied Palestinian Territories (OPTs).

Our previous discussions focused on Company A’s enhanced due diligence in conflict zones and the company’s human rights risk assessment. In the call, the company confirmed that there have been no changes to this process. While Company A’s approach is guided by UN principles, the company’s actions are primarily shaped by compliance with local laws, particularly US state laws prohibiting boycotts or divestment from Israel and its occupied territories. The company emphasised that customer choice remains central to its mission.

The company provided further information on the classification of listings, noting that they are officially designated as located in “Palestinian Territory, Israeli Settlement” on the website. Longview asked whether the recent recognition of the State of Palestine by some European countries might affect Company A’s assessment of legal and reputational risks associated with these listings. Company A responded that, given its tiered framework for evaluating such risks, the outcome of its assessment would likely remain unchanged.

The company also confirmed that it continues to consult external experts and stakeholders, including civil society organisations in affected areas, as part of its assessment process. During the call, Company A noted that the number of listings in Israeli settlements has fallen below 100 over the past two years.

We will continue to engage with the company on this issue and monitor its approach to listings in Israeli settlements.

Newton (Diversified Growth Fund /Absolute Return) Part of Access Pool

Fund Manager collaborate engagement groups - links on page 42.

- Climate action 100+
- FRC Stewardship Code 2020
- Institutional Investors Group on Climate Change (IIGCC)
- Net Zero Asset Managers Initiative
- Taskforce on Climate Related Financial Disclosure
- UN Global Compact
- United Nations Principles for Responsible Investment (UNPRI)
- Global Investor Statement

Voting

Number of Voteable meetings	Resolutions voted	Votes for	Votes against	Abstained/ Withheld/ Did not vote	With management	Against management
3	52	50	2	0	50	2

Note: All data displayed is fund specific, not at fund manager level

Engagement

[Newton – Responsible investment page - available here](#)

[Newton – Quarterly Reports - available here](#)

Example ESG Engagement

Clarios Global Lp

Relevance

E - Climate transition risk and net zero strategy = Clarios is present in an industry that is a key enabler for the energy transition, but is also subject to numerous material risks through its supply chain, which can have a material impact on the share price and balance sheet quality, notably in the context of a non-linear transition and trade wars.

Key Takeaways

E - Climate transition risk and net zero strategy = Company is steady on its decarbonisation journey, tackling the usual challenges for an entity operating in its sector. However, supply chain and geopolitical constraints are forcing the company to be focused on the local supply chain, obtaining decarbonisation results and showing plenty of evidence of local decarbonisation.

Engagement Outcome

E - Climate transition risk and net zero strategy = Scaling Circularity & Scope 3

- Management highlighted that they've broadened their technology portfolio to include lithium—and are now evaluating sodium—for next-generation battery materials.
- They lean heavily on their engineering talent to embed “circular” mechanics from the ground up. Lithium-ion has already become a standout success, and they're actively developing end-of-life recycling and recovery solutions—a critical area I'll be watching closely.

Operational Decarbonization & Resource Efficiency

- The company is driving plant-level efficiency through circular-process installations, targeted energy-use optimizations.
- To address water-stress risk, they've partnered with a specialist sustainability consultancy to benchmark and reduce water intensity across all facilities.

Regional Ownership

- Local teams are empowered to own decarbonization outcomes. In Spain, tailored power-purchase agreements have already driven Scope 2 emissions to zero. In Germany, long-term renewable PPAs back manufacturing baseload; in Mexico, they're leveraging nuclear for the same purpose.
- Each year they seed a dedicated innovation fund to finance decarbonization projects across geographies, ensuring there's capital lined up for pilot programs and scalable roll-outs.

Next Steps

E - Climate transition risk and net zero strategy = Monitor latest disclosures in early 2026 and conclude the engagement as evidencing of decarbonisation is sufficient for the moment to gain comfort in the company's actions.

Ruffer (Diversified Growth Fund /Absolute Return) Part of Access Pool

Fund Manager collaborate engagement groups - links on page 42.

- Climate action 100+
- FRC Stewardship Code 2020
- Institutional Investors Group on Climate Change (IIGCC)
- Net Zero Asset Managers Initiative
- Sustainability Accounting Standards Board (SASB)
- Transition Pathway Initiative
- United Nations Principles for Responsible Investment (UNPRI)

Voting

Number of Voteable meetings	Resolutions voted	Votes for	Votes against	Abstained/ Withheld/ Did not vote	With management	Against management
12	199	175	24	0	176	23

Note: All data displayed is fund specific, not at fund manager level

[Ruffer – Quarterly Reports available here](#)

Engagement – from Quarterly Responsible Investment Report

Jet2

OBJECTIVE: to gain comfort on Jet2’s plan to secure economic supply of sustainable aviation fuel (SAF) to meet the UK SAF Mandate

In 2023, Jet2 announced an investment in the proposed UK-based Fulcrum Northpoint bioenergy facility. Bioenergy is fuels derived from vegetable oils or other non-fossil fuel feedstocks. Jet2 expected to secure more than 200 million litres of SAF over a 15-year period. SAF is a critical drop-in solution enabling aviation to lower its ‘in the air’ greenhouse gas (GHG) emissions, as it can be blended with jet fuel to power existing engines. Jet2’s partner in the project, US-based Fulcrum BioEnergy, entered Chapter 11 bankruptcy protection in 2024, leaving the development of Northpoint uncertain.

Jet2 entered this project to meet the UK SAF mandate, which took effect on 1 January 2025, and to actively manage the cost of supplies. The mandate requires 2% of total UK jet fuel demand to be accounted for by SAF, increasing linearly to 10% in 2030 and 22% in 2040. This provides a demand signal to the market, allowing biofuel production to scale over time. Jet2 said the local team is attempting to revive the Northpoint plant through a management buy-out. Meanwhile, its management is engaging with the UK government through working groups to develop the policy framework necessary to support domestic production of SAF.

We also asked if there was any recourse on Jet2 if it failed to meet the mandated volume. Its response suggested the burden falls on the refiners, not the airlines. In the interim, Jet2 assured us it had secured sufficient volume to meet the 2025 mandate level through commercial arrangements with suppliers including Shell Aviation and Q8Aviation. However, Jet2 also remarked that the cost differential to jet fuel and secure supply of the required volume remain challenges.

OBJECTIVE: to ask Jet2 to increase quantitative ESG disclosures in its annual reporting

In January 2025, Jet2 appointed a senior-level Head of Sustainability to drive and further refine its sustainability strategy. One area we identified for potential improvement related to quantitative disclosure of relevant and financially material ESG metrics, going beyond disclosing its carbon footprint and industry standard metrics such as grams of carbon dioxide equivalent per revenue passenger kilometre (gCO₂e/RPK). Jet2 acknowledged shareholders and other stakeholders' increasing interest in and demand for extra-financial data and information. Jet2 confirmed it intends to provide additional data in its next sustainability report. The company also expressed its openness to feedback on new metrics once they are published.

FOLLOW-UP ENGAGEMENT

In this meeting, we probed Jet2 on whether it saw evidence of changing weather and climate patterns influencing the timing and destination of travel destinations. The travel and tourism sector is deeply dependent on nature, with more than 80% of the value of its goods and services reliant on natural capital and ecosystem services. While Jet2 addresses nature and biodiversity through its certified sustainable hotels programme and is seeking ways to increase energy efficiency (such as using two rather than six coats of paint, to lower the weight of aircraft), we would like to engage more deeply with the company on how it considers and quantifies its impact and dependencies on nature and biodiversity.

Baillie Gifford Global Alpha Paris Aligned (Active listed equity) Part of the Access Pool

Fund Manager collaborate engagement groups - links on page 42.

- FRC Stewardship Code 2020
- Climate Action 100+
- Institutional Investors Group on Climate Change (IIGCC)
- Net Zero Asset Managers Initiative
- Taskforce on Climate Related Financial Disclosure
- United Nations Principles for Responsible Investment (UNPRI)

Voting

Number of Voteable meetings	Resolutions voted	Votes for	Votes against	Abstained/ Withheld/ Did not vote	With management	Against management
8	107	96	10	1	89	18

Note: All data displayed is fund specific, not at fund manager level

Resolutions voted on in quarter.

[Baillie Gifford – Governance and sustainability \(LGPS\) – available here](#)

Baillie Gifford voting policies and guidelines

[Baillie Gifford - Stewardship & Climate Documents – available here](#)

Engagement

[Baillie Gifford - ESG information available here](#)

[Baillie Gifford - Quarterly reports available here](#)

Examples of engagement in quarter (as per Quarterly report)

Spotify Technology S.A.

Objective: Our engagement with Spotify's leadership aimed to understand how the company intends to grow sustainably while balancing user experience, fair creator compensation, and responsible adoption of new technologies.

Discussion: Chief executive officer (CEO) Daniel Ek underlined Spotify's ambition to expand well beyond its current 700 million users, with growth driven by higher premium conversion rates, expansion in emerging markets, and more flexible pricing. Importantly, Spotify remains committed to being a subscription-led

platform, prioritising user value over time-spent metrics common in social media.

The company is also exploring new verticals such as audiobooks and education, with the latter potentially offering certified learning credentials. Ek noted that record labels could outsource more services to Spotify, positioning the company to play a larger role in supporting creators. Operationally, Spotify has streamlined its workforce to prepare for AI integration, which management believes will drive efficiency while reshaping how both employees and creators engage with the platform.

Outcome: The meeting informed our conviction in Spotify's ability to deliver sustainable growth while maintaining a consumer-first culture. The company's emphasis on sensible monetisation, creator support, and healthier digital engagement aligns with our expectations.

Microsoft Corporation

Objective: We welcomed Microsoft's investor relations team to our Edinburgh office to discuss Microsoft's AI strategy, including its partnership with OpenAI and the implications for long-term resilience and sustainability.

Discussion: Microsoft stressed its emphasis on resilience, highlighting fungible data centre infrastructure that can flex between training, inference and enterprise applications. This reduces stranded asset risk and supports margins in the long term. Turning to OpenAI, Microsoft acknowledged competitive tensions but underscored the long-term benefits of the partnership, including perpetual IP rights to 2030, exclusive Azure hosting and revenue-sharing. The relationship was presented as a balance of collaboration and competition, reinforced by strong contractual protections.

Finally, the Microsoft team reaffirmed its 2030 goal to be carbon negative and water positive, despite AI accelerating energy demand. The company framed this as both a challenge and an opportunity: Scope 1 progress has been driven by renewable contracts, while scope 3 remains more difficult. Supplier requirements and efficiency measures are being introduced to mitigate environmental impact while supporting growth.

Outcome: The meeting offered useful insight into how Microsoft is balancing innovation with responsibility. Its flexible infrastructure should provide long-term resilience given the uncertainty of AI adoption. We were glad to hear the team continue to emphasise sustained climate commitments as the business grows rapidly, though we will need to continue monitoring progress closely.

Storebrand Global ESG Plus (Passive listed equity)

Fund Manager collaborate engagement groups - links on page 42.

- Carbon Disclosure Project
- Climate action 100+
- Institutional Investors Group on Climate Change (IIGCC)
- Net Zero Asset Managers Initiative
- Taskforce on Climate Related Financial Disclosure
- United Nations Principles for Responsible Investment (UNPRI)
- Global Investor Statement

Voting

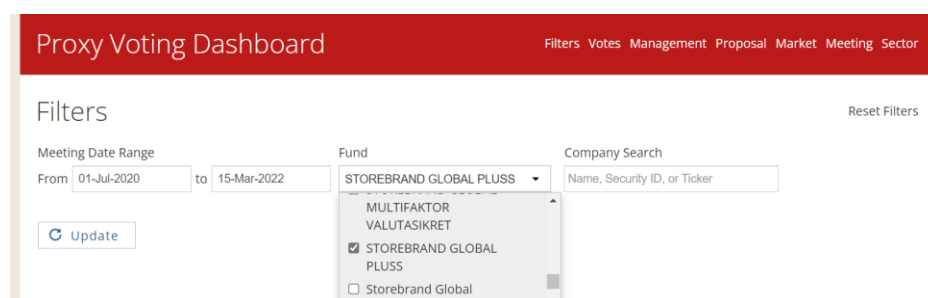
Number of Voteable meetings	Resolutions voted	Votes for	Votes against	Abstained/ Withheld/ Did not vote	With management	Against management
51	477	454	16	7	452	25

Note: All data displayed is fund specific, not at fund manager level

Resolutions voted on in the quarter:

[Storebrand – Proxy voting dashboard – available here](#)

Note: Please select 'Storebrand Global Plus' in the 'Fund' dropdown box



The screenshot shows the 'Proxy Voting Dashboard' interface. At the top, there are navigation tabs: 'Filters', 'Votes', 'Management', 'Proposal', 'Market', 'Meeting', and 'Sector'. The 'Filters' section is active and contains the following fields:

- Meeting Date Range:** From 01-Jul-2020 to 15-Mar-2022. An 'Update' button is located below this field.
- Fund:** A dropdown menu is open, showing 'STOREBRAND GLOBAL PLUS' as the selected option. Other visible options include 'MULTIFAKTOR VALUTASIKRET', 'STOREBRAND GLOBAL PLUS', and 'Storebrand Global'.
- Company Search:** A text input field with the placeholder 'Name, Security ID, or Ticker'.

A 'Reset Filters' button is located in the top right corner of the filter section.

Storebrand voting guidelines and policies:

[Storebrand – Proxy voting policy – available here](#)

Engagement

[Storebrand – Sustainability page available here](#)

[Storebrand – Quarterly Reports available here](#)

Engagement Example: Bunge

Bunge Global SA and Archer Daniels Midlands (ADM) are among the world's largest traders of agricultural commodities like soy and palm oil globally. Because production of these commodities is among the most important drivers of tropical deforestation, and because both companies have high exposure to deforestation risk in their supply chains, we placed Bunge and ADM on our Observation list in 2021.

Our portfolio managers are not allowed to increase investments in companies on our Observation list. In order to be removed from the list, companies must show tangible progress towards a set of expectations defined by Storebrand Asset Management. In the case of Bunge and ADM, in 2021, we set and communicated the following expectations to them:

- Full traceability, transparency and monitoring of direct and indirect suppliers across all commodity supply chains.
- A commitment to not source commodities from suppliers that have deforested or converted native vegetation after the year 2020 (Aligned with the EU Deforestation Regulation).
- Require suppliers to restore all areas deforested or converted after January 1st 2020, and all areas illegally deforested or converted prior to 2020.

We have maintained dialogue with the companies on these issues. In the case of Bunge, we also co-filed a shareholder proposal in 2024, which we withdrew after successful negotiation with the company.

In Q3 this year, we undertook a new assessment of Bunge and ADM. While the assessment indicates that neither company has fully met our expectations, we made the decision that Bunge has made sufficient progress to be removed from the Observation list. This means that we have lifted the investment restrictions described above that were linked to the company's previous status of being named on our Observation list.

We will continue monitoring and conducting dialogue with Bunge, as part of our regular engagement on deforestation risk. In the case of ADM, we decided to maintain the company on our Observation list for the time being.

[Read more in the quarterly report available here](#)

Wellington (Active listed equity – impact fund)

Fund Manager collaborate engagement groups - links on page 42.

- FRC Stewardship Code 2020
- Climate Action 100+
- Institutional Investors Group on Climate Change (IIGCC)
- Net Zero Asset Managers Initiative
- Taskforce on Climate Related Financial Disclosure
- United Nations Principles for Responsible Investment (UNPRI)

Voting

Number of Voteable meetings	Resolutions voted	Votes for	Votes against	Abstained/ Withheld/ Did not vote	With management	Against management
9	87	85	2	0	85	2

Note: All data displayed is fund specific, not at fund manager level

Resolutions voted on in the quarter:

[Wellington – Global proxy voting disclosure – available here](#)

Wellington voting guidelines and policies:

[Wellington – Global proxy voting policy – available here](#)

[Wellington Sustainability related investment Disclosures – available here](#)

Fund Overview

Actively managed equity fund which seeks to understand the world’s social and environmental problems. The fund looks to identify and invest primarily in the equities of companies that Wellington believe are addressing these needs in a differentiated way through their core products and services. Through the investments, the fund seeks to improve access to, and the quality of, basic life essentials, reduce inequality and mitigate the effects of climate change. The Wellington fund focuses on investing in the world you want to live in: focusing on investments that aim to achieve a positive social or environmental impact.

Engagement

During the quarter, Wellington visited Grocery Outlet’s (sustainable Agriculture and Nutrition, US) headquarters in California and toured two stores with CEO Jason Potter, who was newly appointed in February, and several members of the company’s management team. The company is focused on improving store-level execution to drive sales increases in the two pilot locations, which they intend to rollout to the other stores through 2026. We experienced a simplified store layout and flow improvements that provided the experience of a “treasure hunt” for great value within a very efficient shopping experience. We believe there is low hanging fruit in store layout and merchandising that has potential to drive increased traffic and basket sizes. The new CEO impressed us operationally with a skillset directly applicable to the business’s current needs. This engagement strengthened our understanding of the operational changes taking place and reinforced our conviction of the position.

WHEB (Active listed Equity – Impact fund)

Fund Manager collaborate engagement groups - links on page 42.

- Access to Medicines Foundation
- B Corps
- British Standards Institute
- Carbon Disclosure Project
- Chemical Footprint Project
- Climate action 100+
- EUROSIF
- FRC Stewardship Code 2020
- Future Fit Business
- Global Impact Investing Network
- Impact Management Project
- Institutional Investors Group on Climate Change (IIGCC)
- Net Zero Asset Managers Initiative
- Net Zero Carbon 10
- The Big Exchange
- UKSIF
- United Nations Principles for Responsible Investment (UNPRI)
- Global Investor Statement

Additional Information

WHEB were awarded Best ESG Global Equity Fund 2023 by MainStreet Partners, an ESG advisory and portfolio analytics firm

WHEB utilizes analysis tools to inform investors of the beneficial aspects of their investments. As of 30th September 2025, East Sussex has £213.6m invested in WHEB, which has resulted in:

103,361 MWh of renewable energy generated (equivalent to 8,969 European households)
 153,120 tons of CO2 emissions avoided (equivalent to the average yearly electricity use of 76,453 houses)
 256.3m litres of water use avoided (equivalent to the water used by 4.1m showers)

Voting

Number of Vote-able meetings	Resolutions voted	Votes for	Votes against	Abstained/ Withheld/ Did not vote	With management	Against management
8	75	56	16	2	56	19

1 vote made was date related

Note: All data displayed is fund specific, not at fund manager level

Resolutions voted on in the quarter:

[WHEB – detailed voting record – available here](#)

WHEB voting guidelines and policies:

[WHEB – Stewardship and Engagement policy – available here](#)

[WHEB – RI policy – available here](#)

Engagement

[WHEB – Quarterly Reports available here](#)

[WHEB – Impact report available here](#)

Engagement example: First Solar

First Solar is a US-based manufacturer of solar photovoltaic (PV) panels. Headquartered in Arizona, the company is the leading global supplier of thin-film modules that are used primarily in utility-scale and commercial power plants. The company has manufacturing facilities in India, Malaysia and Vietnam as well as the US and operates a sector-leading approach to the manufacturing and recycling of its solar modules.

Investor objective: Delivery, acceleration and enhancement of the company's positive impact

Engagement objectives:

Achieve net zero emissions by 2050, with substantive reductions across all scopes, in the near-term by accelerating progress on Scope 1 and 2 emissions, particularly through renewable energy sourcing.

Improve transparency on hazardous chemical management.

Enhance disclosure on recycling effectiveness.

Background

Despite its critical role in global decarbonisation, First Solar ranks among the WHEB fund's highest financed emitters. A key frustration has been its failure to leverage its own solar technology to reduce Scope 2 emissions.

To address this, we have engaged the company through the Investors for Sustainable Solar initiative. The company has recently made good progress however, with SBTi validation of near and long-term targets, and publication of a carbon reduction roadmap. First Solar also targets 100% renewable energy by 2028, delayed by two years due to rapid production growth.

Actions

We took part, along with collaborating investors, in a group call with First Solar's Head of ESG and Sustainability and its Investor Relations team, in which we outlined the following asks:

Replacement of fossil-based energy with renewables.

Increased energy efficiency.

Greater disclosure on hazardous chemicals and recycling.

Outcome

Milestone 4 - Company provided evidence that the issue is being managed in line with the policy or strategy, demonstrating concerns have been addressed.

First Solar has made meaningful progress though some challenges remain.

Scope 1 and 2 emissions continue to rise as a result of the company's rapid growth, with production expected to quadruple by 2026. To manage this, First Solar is focusing on reducing emissions intensity through improvements in energy efficiency. Achieving absolute reductions will require greater procurement of renewable energy, which the company is exploring through power purchase agreements, such as one recently established in India, alongside renewable energy credits and partnerships with customers.

On hazardous chemicals, the company confirmed that its internal chemical policy is under review and agreed to consider the group's invitation to join the Toward Zero Exposure initiative, which aims to mitigate worker risks. Recycling performance was also discussed. First Solar's solar modules are 95% recyclable, but the company has not disclosed what proportion of its modules are actually recycled. The company clarified that volumes are still very low. Most recycled material comes from their own manufacturing processes as most modules have not reached the end of their operating life. The company expects volumes to begin to pick up by 2030 and is keen to understand how best to report on this as the process matures.

Beyond environmental concerns, First Solar also highlighted its commitment to community engagement, citing its partnership with Vitro in Pennsylvania as an example of supporting high-quality, long-term jobs and training. The company also continues to advocate actively on public policy, working to counter misinformation about solar energy and address local resistance.

As the global economy moves towards decarbonisation, First Solar is well positioned to benefit from growing solar demand. Its decarbonisation targets are now aligned with the Paris Agreement, and it has implemented robust systems and processes to reduce emissions intensity. While short-term emissions will rise due to expansion, we expect meaningful reductions over the next five years. We will continue to monitor progress on absolute emissions, recycling transparency, and chemical safety as part of our commitment to achieving net zero across our portfolio by 2050.

Atlas (Infrastructure listed equity)

Fund Manager collaborate engagement groups - links on page 42.

- FRC Stewardship Code 2020
- Climate Action 100+
- Institutional Investors Group on Climate Change (IIGCC)
- Net Zero Asset Managers Initiative
- Taskforce on Climate Related Financial Disclosure
- United Nations Principles for Responsible Investment (UNPRI)
- Global Investor Statement

Voting

Number of Voteable meetings	Resolutions voted	Votes for	Votes against	Abstained/ Withheld/ Did not vote	With management	Against management
4	94	94	0	0	94	0

Note: All data displayed is fund specific, not at fund manager level

Resolutions voted on in the quarter:

Atlas does not provide underlying quarterly voting information or their voting policy on their website. If required, this information should be requested directly from the fund manager.

[Atlas – Environmental, social and governance – available here](#)

Atlas voting guidelines and policies:

[Atlas – Responsible investment policy – available here](#)

Engagement

[Atlas - ESG Page available here](#)

Engagement Example taken from annual report:

RWE

Opened and Closed August 2024

Background:

During 2024, RWE was a holding in the Global Strategy portfolio. RWE is a German renewable generation business and has historically been the largest coal-fired power generator in Europe but has moved into renewable energy in recent years. In August RWE was rumoured to be looking to acquire gas-fired generation assets in the US owned by Calpine, the largest owner of GFG in the country. Our analysis suggested that this acquisition would make RWE's emissions trajectory misaligned with the Paris Agreement goals (Tier 4 – Misaligned) and contradict our investment thesis by increasing merchant power price

exposure.

Engagement objectives:

To deter RWE management from increasing RWE's exposure through the acquisition of Calpine to fossil fuel and merchant power price electricity generation assets

Engagement outcomes:

After an initial meeting with the CFO, we updated our financial model to reflect greater merchant risk and higher forecast emissions. This increased the risk of loss signals and worsened the Paris Alignment outlook in our Decision Support.

- In combination with changes in the ranking of other prospective investments the investment committee decided to reduce the position in RWE, which was communicated to company management.
- Following ATLAS' engagement with management and broader market criticism of the rumoured deal, RWE CEO Markus Krebber announced in late September that RWE was now unlikely to acquire US gas assets.

Investment impact / next steps:

ATLAS continues to monitor the Science Based Targets of RWE and the alignment of the business with Paris Agreement targets

UBS Osmosis Resource Efficient Core Equity (ex- Fossil Fuels) (Passive listed Equity) Part of the Access Pool

Fund Manager collaborate engagement groups - links on page 42.

- Carbon Disclosure Project
- Climate action 100+
- FRC Stewardship Code 2020
- Institutional Investors Group on Climate Change (IIGCC)
- Net Zero Asset Managers Initiative
- United Nations Principles for Responsible Investment (UNPRI)
- Global Investor Statement

Voting

Number of Voteable meetings	Resolutions voted	Votes for	Votes against	Abstained/ Withheld/ Did not vote	With management	Against management
28	298	264	27	7	269	29

Note: All data displayed is fund specific, not at fund manager level

Resolutions voted on in the quarter:

[UBS – voting record – available here](#)

UBS Osmosis Achieved Environmental fund of the year 2021 for their listed equity portfolio.



Engagement

[UBS Sustainability page available here](#)

[UBS Annual Report available here](#)

Antofagasta

Topic: CEO Succession Planning, Decarbonisation strategy

Context

Antofagasta is a UK-listed, pure-play copper mining company with operations concentrated in Chile. Our engagement spans three years and has covered water risk, board effectiveness, and climate strategy.

Recently, we prioritized two high-impact areas:

– Electrification of mine haulage trucks, which account for up to 80% of Scope 1 emissions.

– Leadership continuity, given the strategic importance of succession planning in a capital-intensive, operationally complex sector.

Actions taken

Decarbonization: We met with the chief decarbonization officer for a deep dive into mining-sector technologies. We emphasized the need for a clear roadmap, interim targets, and mine-specific design constraints that affect feasibility.

Governance: We met with the senior independent director to review progress on CEO succession planning and discussed workforce composition.

Outcomes

Decarbonization: Antofagasta conducted pre-feasibility studies across multiple mines to assess the viability of battery electric vehicle (BEV) haulage trucks.

Findings:

- Smaller trucks are economically feasible; larger trucks face challenges due to battery weight and charging speed.
- Mine depth significantly affects BEV suitability—shallow pits are more adaptable.
- Electrification could double Chile’s mining energy demand, prompting collaboration with government and industry peers (e.g., Codelco, BHP) to expand grid infrastructure.
- Interim solutions such as hybrid and trolleyassist systems are being trialed.

These findings directly impact capital planning, operational efficiency, and long-term cost structure. Electrification investments will require significant infrastructure upgrades and coordination with external stakeholders, affecting both timelines and returns.

Governance:

- Antofagasta completed a CEO succession planning exercise, identifying internal candidates and implementing a longer notice period and interim leadership protocols.
- The board also reviewed its skill matrix to align with strategic priorities.

Robust succession planning mitigates leadership transition risk, supports strategic continuity, and enhances investor confidence – particularly important in a sector where operational disruptions can materially affect performance.

Next steps

We will continue to engage with Antofagasta to:

- Encourage enhanced disclosure of decarbonization-related capital expenditure and investment timelines.
- Monitor implementation of succession planning and board refreshment.
- Assess progress on workforce diversity and governance modernization.

UBS Infrastructure Fund

Fund Manager collaborate engagement groups - links on page 42.

- Carbon Disclosure Project
- Climate action 100+
- FRC Stewardship Code 2020
- Institutional Investors Group on Climate Change (IIGCC)
- Net Zero Asset Managers Initiative
- United Nations Principles for Responsible Investment (UNPRI)
- Global Investor Statement

Engagement

[UBS Sustainability page available here](#)

[UBS Annual Report available here](#)

Glencore (taken from latest annual sustainability report)

Case study results: In early-2024, Glencore published an updated climate action transition plan with expanded discussion on the strategy for its coal business, and a data provider upgraded its assessment of the management of community relations at Cerrejon Coal.

Next step: Continued engagement on the climate action transition plant and further improvement of community relations in Colombia.

Purpose of engagement: In recent years, our engagement with Glencore has covered a range of topics and we have seen a number of positive changes at the company. These have included board and senior management changes, the introduction of a new internal compliance system in response to bribery and corruption charges, and an overall enhancement in sustainability performance. One key operational improvement has been the reduction in fatalities in the company's mining operations. As a result of these changes, our engagement focus has steadily shifted to two additional topics. First, climate: Glencore published a transition action plan nearly three years ago and we are engaging to gain clarity into the company's strategy, with a particular focus on the managed decline of its thermal coal mining business. Second, community relations: Glencore's acquisition of full ownership of Cerrejon Coal in Colombia has brought longstanding community relations issues within the direct scope of the group. Here, our engagement is focused on ensuring good management of community relations in a complex social situation.

Action: We have been engaging with Glencore on climate change issues for more than three years. This has included discussions with the board chair, the head of sustainability and investor relations. In 2021 we supported Glencore's Say on Climate reflecting the overall depth and detail of its first climate transition action plan which incorporated targets for a significant reduction in scope 1, 2 and 3 emissions. Since then, we have continued to engage with a focus on the strategy for the coal division, and especially for greater transparency into Glencore's plans to manage a reduction in overall thermal coal production. During this period, discussion has been against the backdrop of Glencore's purchase of a full interest in Cerrejon Coal,

the proposed merger with Teck Resources and the recent announced acquisition of Teck's metallurgical coal assets.

With regards to community relations at Cerrejon Coal, we engaged with the chair and head of sustainability and have met with the Cerrejon Coal CEO and her team. In November 2023, alongside UBS-AM colleagues, we also met with community representatives and civil society organizations to discuss the situation.

Outcomes: Glencore will present its revised climate transition action plan for shareholder approval at its AGM in the first half of 2024. In our engagements the company has highlighted actions it has been taking to review its plan, and we expect that greater detail on implementation, just transition and policy advocacy will be provided. Glencore verbally confirmed its intention to wind down its thermal coal assets while the pace of the reduction will be determined by global policy, the stability of the global energy system and pricing.

Our meetings with Glencore and community representatives, as well as our broader research, confirm the complexity of the social situation in the La Guajira province which is the location of Cerrejon Coal. It is clear that community relations reached a nadir around six years ago and that action has been spurred by the intervention of the Constitutional Court. More recently, our research indicates an improvement in the approach to community relations, although legacy grievances remain and frustrations are ongoing.

Status and next steps: Engagement on both the group climate change plans and the community relations in Colombia are ongoing. Glencore's openness to receiving feedback from investors and its dialogue on both topics provides a constructive backdrop to our engagement.

We will engage further with Glencore on the details of the climate transition plan. The extent to which the plan contains further information, especially on the direction of the coal business, will be a factor in determining our position on the upcoming Say on Climate vote.

Since late-2022, we have taken the view that Glencore was making sufficient progress in managing the community issues in Colombia to allow us to assess the company as demonstrating credible corrective action in line with our SI Exclusion Policy. In March 2024, one of the major ESG rating agencies upgraded its view, removing its indication of a violation of the United Nations Global Compact principles, following a reassessment of Glencore's role and actions.

We are continuing to engage with Glencore on community relations in Colombia. This includes incorporating the insights from our recent contact with communities into our engagement dialogue with the company. We are especially interested in how Glencore progresses with Cerrejon's community consultation and agreements, and how the subsidiary implements the recent update of the human rights impact assessment.

CBRE (Property)

Fund Manager collaborate engagement groups - links on page 42.

- United Nations Principles for Responsible Investment (UNPRI)
- Institutional Investors Group on Climate Change (IIGCC)
- Sustainability Accounting Standards Board (SASB)

Engagement

[CBRE - Sustainability page available here](#)

No engagements undertaken this quarter.

CBRE Investment Management increased its average score for Direct Real Estate in the 2025 GRESB Real Estate Benchmark Assessment by more than 2% on a gross asset value (GAV)-weighted basis compared to 2024 and exceeded the GRESB average by seven points.

CBRE IM submitted 62 Direct Real Estate portfolios to the real estate assessment this year—the most of any commercial real estate fund manager for the sixth year in a row. GRESB, a leading global sustainability benchmark for real assets, provides a framework to assess, compare and discuss sustainability governance and performance. We received a score of 30 out of 30 for the sixth consecutive year on the management component of the assessment demonstrating our integration of sustainability and climate risk into our governance processes and procedures. The results point to the depth and breadth of our commitment to sustainability performance, continual improvement and transparency. Our portfolios achieved high marks from GRESB, including:

- A more than five-point increase from 2022 (80.45) in our average weighted score to 85.94 for Direct Real Estate, which exceeds the 2025 GRESB real estate average of 79 by nearly seven points or 8.9%
- Seven real estate peer group leaders:
 - o Our Dutch office fund
 - o Our Spanish retail fund
 - o Two U.K. separate account portfolios
 - o A U.S. separate account portfolio
 - o A European shopping centre fund joint venture
 - o A European value-add fund
- 5-star ratings for 15 funds and 4-star ratings for 15 funds, indicating strong sustainability portfolio performance
- An average score of 96.06, weighted by GAV, for development, which is 9% higher than the GRESB average of 88.

We also submitted our global core infrastructure fund to the GRESB Infrastructure Assessment and increased our score by six points compared to 2024.

Infracapital (Infrastructure unlisted equity)

Fund Manager collaborate engagement groups - links on page 42.

- Carbon Disclosure Project
- Climate action 100+
- Climate-wise Disclosures
- Financial Reporting Council
- ILPA Diversity in Action Initiative
- Institutional Investors Group on Climate Change (IIGCC)
- Investors Forum
- UK Sustainable Finance and Investment Association

Engagement

[Infracapital - Responsible Investment approach including ESG engagement available here](#)

Responsible Investment Update taken from Q3 2025 Management Report

During the quarter, Infracapital strengthened its long-standing partnership with Rock Rail, an independent developer, owner, and asset manager of transport infrastructure, through its fourth investment in the German rolling stock market. This latest project, delivered via Infracapital Greenfield Partners II's Marble Platform, will finance the construction of a new electric multiple unit (EMU) fleet for the Magdeburg region's public transport network under the Electronetz Nord-Magdeburg ('ENORM') concession. The ENORM fleet will represent approximately 21% of regional rail travel, replacing an ageing, fragmented fleet to enhance passenger experience, improve connectivity to key cities, and support the decarbonisation of Europe's rail networks, delivering tangible benefits to local communities.

Following the announcement of proposed changes to the EU's Sustainable Finance Disclosure Regulation (SFDR), we continue to closely monitor regulatory developments to ensure compliance and proactively future-proof our investment strategies. Our approach focuses on aligning with evolving sustainability standards while maintaining flexibility to adapt to new requirements, safeguarding both ESG integrity and long-term commercial performance.

Pantheon (Infrastructure unlisted equity)

Fund Manager collaborate engagement groups - links on page 42.

- Initiative Climate International (iCI)
- RepRisk
- Sustainability Accounting Standards Board (SASB)
- Taskforce on Climate Related Financial Disclosure
- United Nations Principles for Responsible Investment (UNPRI)
- Global Investor Statement

Engagement

[Pantheon - ESG Page available here](#)

[Pantheon - ESG Reports available here](#)

Pantheon do not produce quarterly engagement reports; however, they do have a strict ESG Monitoring process both in securing investments and afterwards, including maintaining a log of ESG issues that are not dependent on themselves finding the issue, Customized monitoring on portfolio companies to track adverse ESG publicity, and utilization and provision of ESG metrics.

Engagement update form pantheon:

There are no engagement examples to share for this quarter, as we are preparing to start this year's engagement cycle with our Infrastructure GPs shortly (Q1 2026). Following our 2025 GP Sustainability Survey, which saw participation from 270+ GPs globally, including all Infrastructure managers in the East Sussex portfolio. As in prior years, each participating manager will receive their Fund Manager Sustainability Scorecard, which includes an overall Sustainability Maturity Rating (1–5*+), alongside category-level scores (A–E) covering Oversight & Implementation, Climate Maturity, Reputational Risk, Reporting & Transparency, and Biodiversity Essentials. The Scorecards will also include peer group benchmarking to provide additional context and support more targeted engagement and, as with last year, we will request mandatory follow-up calls with managers that are lagging peers.

IFM Infrastructure Fund

Fund Manager collaborate engagement groups - links on page 42.

- United Nations Principles for Responsible Investment (UNPRI)
- Institutional Investors Group on Climate Change (IIGCC)
- Climate action 100+
- Global Real Estate Sustainability Benchmark (GRESB)
- Financial Reporting Council
- Net Zero Asset Managers Initiative

Engagement

[Sustainability Reports available here](#)

Engagement Example: Naturgy

Topic: Environment – Climate change

Rationale: IFM is targeting Net Zero across all asset classes, including GIF by 2050.

IFM engages with Naturgy through our active management approach, either at the Board level where we have one seat, or through frequent direct interactions with Naturgy management.

What have IFM done: Naturgy has set targets so that by 2025, Naturgy is targeting to reduce its Scope 1 and 2 emissions by 48% compared to a 2017 baseline and transition to a 60% renewable energy generation mix.

As part of its long-term climate strategy, the company is seeking to increase the installed capacity of renewable generation, supporting the development of biomethane and green hydrogen as new products, developing storage systems and improving value chain energy efficiency.

Outcomes & Next Steps: During Q3 2025, Naturgy achieved a total operational renewable capacity of 1.2 GW in Spain. Naturgy also initiated a major upgrade of its wind energy infrastructure in Spain to reduce visual impacts, the €67 million investment is being financed through the European Union's NextGenerationEU program.

M&G (Fixed Income) Part of the Access Pool

Fund Manager collaborate engagement groups - links on page 42.

- Carbon Disclosure Project
- Climate action 100+
- Climate-wise Disclosures
- Diversity in Action Initiative
- Financial Reporting Council
- Institutional Investors Group on Climate Change
- Investors Forum
- UK Sustainable Finance and Investment Association
- Net Zero Asset Managers Initiative

Engagement

[M&G - Sustainability page](#) available here

[M&G - Responsible Investment & Reports](#) available here

Engagement Example –Electricite De France SA

Objective Description – Ambition: Encourage the company to consider rewording the ambition to commit specifically to minimising key drivers of nature loss rather than mitigation, which would be more in-line with the language used in the NA100 benchmark.

Meeting Outcome – Ambition: EDF’s current ambition is to “mitigate our negative impacts. We encouraged EDF to consider rephrasing this to reflect a commitment to minimising key drivers of nature loss, aligning more closely with the Nature Action 100 (NA100) benchmark.

Assessment

EDF conducts detailed site-level assessments as part of planning and legal obligations.

We discussed the challenge of communicating these assessments at the Group level.

We encouraged EDF to disclose nature-related assessments (dependencies, impacts, risks, and opportunities) with greater granularity and broader coverage.

Targets

EDF has set targets under the Act4Nature initiative, with a 2025 deadline.

We requested an update on progress toward these targets and clarification on future targets and ambitions post-2025.

Implementation

We discussed the complexity of implementing a cohesive nature strategy across EDF’s large operations.

EDF provided an overview of its roadmap implementation and challenges including:

Planned actions

Capital allocation requirements

Development of the current approach, particularly regarding the selection of high-risk areas and the three-year biodiversity project budgeting process.

Governance

We understand that Claire Pedini holds executive accountability for EDF’s nature-related strategy and performance.

We inquired whether she possesses the necessary technical expertise or is supported by relevant experts to effectively oversee the strategy.

We noted her prior experience at Saint-Gobain Group as potentially relevant.

BlueBay (Total Return Credit) Part of the Access Pool

Fund Manager collaborate engagement groups - links on page 42.

- Climate action 100+
- Global Impact Investing Network
- IFRS Sustainability Alliance
- Responsible Investment Association
- UK Stewardship Code
- United Nations Principles for Responsible Investment (UNPRI)

Engagement

[BlueBay Responsible Investment and Climate Change policies available here](#)

BlueBay views and engagement: Morocco

Morocco continues to outperform its peers, strengthening its institutional framework and is serious about addressing some key environmental challenges, in particular tackling water stress. Country remains firmly on the credit rating upgrade trajectory with IG status likely to be achieved this year.

Golub (Private Credit)

Fund Manager collaborate engagement groups - links on page 42.

- ILPA “Driving inclusion in alternatives” Initiative
- United Nations Principles for Responsible Investment (UNPRI)

Engagement

[Golub Responsible Investment available here](#)

Golub produce an annual responsibility report, which is published in the second half of the year. In the interim, their improvements to responsible investment practices include:

Developed new underwriting procedures and templates, customized by industry vertical and subsector, to standardize and enhance our analysis and documentation of material ESG-related risk factors in the investment process

Incorporated ongoing monitoring of ESG-related incidents across our portfolio by leveraging the RepRisk ESG Risk Platform

Created training for investment professionals in Direct Lending, Broadly Syndicated Loans and Credit Opportunities

Formed a Responsibility Committee to champion initiatives, gather data and monitor progress⁴

Established a process to collect specific environmental, social and governance (ESG) data from borrowers in select funds

Became a signatory to the ILPA “Diversity in Action” initiative in March 2021 and a signatory to the UN Principles for Responsible Investment (UN PRI) in January 2022

Adams Street (Private Equity)

Fund Manager collaborate engagement groups - links on page 42.

- Initiative Climate International (iCI)
- RepRisk
- Science based targets Initiative
- Taskforce on Climate Related Financial Disclosure
- United Nations Principles for Responsible Investment (UNPRI)

Engagement

[Adams Street - Responsibility page available here](#)

[2025 ESG Report available here](#)

Every investment decision Adams Street make is based on a careful analysis of both risk and opportunity. By integrating ESG considerations at every stage of the investment life cycle — from deal sourcing, through investment due diligence, to portfolio construction, and reporting and monitoring — they can better identify opportunities for risk mitigation and long-term value creation in their investments.

We can confirm that over the course of Q3 2025, Adams Street engaged with 132 GPs to which East Sussex currently has exposure through their Adams Street portfolio. The nature of these interactions were as follows:

- 14 due diligence meetings
- 5 operational due diligence calls
- 13 advisory board meetings
- 11 LPAC meetings

Harbourvest (Private Equity)

Fund Manager collaborate engagement groups - links on page 42.

- Diverse Alternative Investment Industry Statement
- Diversity in Action Initiative
- Initiative Climate International (iCI)
- Taskforce on Climate Related Financial Disclosure
- United Nations Principles for Responsible Investment (UNPRI)

Engagement

[Harbourvest – Annual ESG report available here](#)

[Harbourvest – TCFD progress report available here](#)

Engagement Update (from 2025 ESG Report)

Verdantas

In 2024, approximately 78% of Verdantas' projects supported the environment, energy transition, and water markets working toward developing a positive environmental impact. Verdantas also experienced rapid growth with the acquisition of 16 new entities in 2024, resulting in a unified team of over 1,750 employees spread across 80 offices nationwide.

Some examples of Verdantas projects that intersect sustainability, community resiliency, and climate change adaptation:

Designing fast-track stabilization repairs for train routes through the Del Mar Bluffs in California, including shear pins and drainage, ensuring safe train passage for 20 more years.

As part of the I-35 Capital Expressway Project in Austin, in a region that has been subject to devastating flash flooding, Verdantas is supporting the design of a stormwater drainage system by conducting Computational Fluid Dynamics (CFD) and physical modelling to ensure performance, compliance, and scour prevention in the Colorado River.

Assisting fish passage restoration on the St. Croix River, bordering Maine and New Brunswick, advancing fish passage designs that will open up 600 miles for migratory fish through studies, modelling, and engineering in collaboration with agencies and tribes.

Verdantas has a goal to incorporate a sustainability outcome in 80% of its projects; to support this they have developed a Sustainability Advisory Practice Group and launched a company-wide training program in 2025 to educate leaders and project teams on how to integrate sustainability principles from planning through execution.

Verdantas is also focused on decarbonization and sustainability in its own operations, finding efficiencies and bolstering employee engagement and corporate identity:

Verdantas was able to significantly reduce Scope 3 emissions between 2023 and 2024 by reviewing its account practices.

In 2024, Verdantas introduced fleet management software that will allow it to manage one of its main

emissions sources.

Verdantas initiated a rebrand in 2024 with an emphasis on circularity principles: all marketing materials were digitized, including digital business cards; a clothing recycling program was implemented for donating old logo apparel; iron-on patches of its new logo were provided for those who wanted to reuse old logo apparel. These efforts strengthened Verdantas' brand identity and reinforced its commitment to sustainability and community engagement.

Fossil Fuel Exposure by Fund Manager

The fund actively monitors the fossil fuel exposure of its fund managers to allow for engagement when we feel that these values are of concern. The below table lists fossil fuel exposure as of 30th September 2025

Fund	Mandate	Exclusion	% Fund Assets	% Fossil fuel exposure of total fund value
UBS Osmosis	Equity - Passive - Resource Efficient	Fossil Fuel free	9%	0.0%
Longview	Equity - Global		10%	0.0%
WHEB	Equity - Sustainable Global	Fossil Fuel free	4%	0.0%
Baillie Gifford	Equity - Global	Fossil Fuel free	5%	0.0%
Wellington	Equity - Sustainable Global	Fossil Fuel free	5%	0.0%
Storebrand	Equity - Passive - ESG Plus	Fossil Fuel free	10%	0.0%
Harbourvest	Private Equity		3%	0.0%
Adams Street	Private Equity		3%	0.0%
Ruffer	Absolute Return		9%	0.3%
Newton	Absolute Return		6%	0.0%
CBRE	Property		6%	0.0%
ATLAS	Infrastructure Equity		2%	0.1%
Pantheon	Infrastructure		1%	0.0%
UBS	Infrastructure		1%	0.1%
M&G	Infrastructure		1%	0.0%
M&G	Fixed Income - Private Debt		0%	0.0%
M&G	Fixed Income - Multi Asset Credit		4%	0.1%
M&G	Fixed Income - Corporate Bonds		2%	0.0%
BlueBay	Total Return Credit		3%	0.0%
Golub	Private Credit		1%	0.0%
UBS - Over 5 Year IL Gilt	Fixed Income - Passive Index Linked Gilts		7%	0.0%
IFM	Infrastructure		5%	0.3%
Cash	Cash		2%	0.0%
Total Assets			100%	0.9%

Engagement Group Links

[Access to Medicines Foundation](#)

[B Corps](#)

[British Standards Institute \(BSI\)](#)

[Chemical Footprint Project](#)

[Climate Action 100+ \(CA100+\)](#)

[European Sustainable Investment & Finance Association \(EUROSIF\)](#)

[Financial Reporting Council Stewardship Code \(FRC\)](#)

[Future Fit Business](#)

[Global Impact Investing Network](#)

[Global Real Estate Sustainability Benchmark \(GRESB\)](#)

[ILPA Diversity in Action Initiative](#)

[Impact Management Project](#)

[Initiative Climate International \(iCI\)](#)

[Investors Forum](#)

[Local Authority Pension Fund Forum \(LAPFF\)](#)

[Net Zero Carbon 10](#)

[Net Zero Asset Managers Initiative](#)

[RepRisk](#)

[The Big Exchange](#)

[Transition Pathway Initiative \(TPI\)](#)

[Sustainable Accounting Standards Board](#)

[UK Sustainable Investment & Finance Association \(SIFA\)](#)

[UN Global Compact](#)

[United Nation Principals for Responsible Investment \(UNPRI\)](#)