

Responsible Investment Policy

This appendix outlines the proposed amendments to Border to Coast's Responsible Investment Policy, scheduled for release in January 2026. It highlights only the sections where changes have been made. For the current version of the Responsible Investment Policy, please refer to our website: [Publications - Border To Coast - Reports](#).

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5. Integrating RI into investment decisions

5.1 Human Rights

When considering human rights issues, ~~we believe that all~~ companies should abide by the UN Global Compact Principles and the OECD Guidelines for Multinational Enterprises. Companies should have processes in place to both identify and manage human rights risks across their business and supply chain. We engage with companies on human rights as part of our social priority engagement theme, engaging on modern slavery and labour practices and human rights due diligence where companies operate in high-risk areas. We have incorporated considerations into how we exercise our votes at company meetings.

5.2 Nature

Nature and bBiodiversity loss is increasingly seen as posing a risk to financial markets. Over half of global GDP is dependent on nature-based services¹, and looking ten years out, six of the top ten global risks identified by the World Economic Forum are climate and environmental related. We address nature risks through engagement on issues like deforestation, resource management, and climate change. We also integrate nature related risks into voting decisions, using benchmarks to identify priority companies, assess their governance, strategy and measures to address nature related risks, and vote accordingly where risks are poorly managed. Further detail on our voting approach is set out in our Corporate Governance & Voting Guidelines.~~We currently address biodiversity issues through engagement with companies and governments on issues including deforestation, natural resource management and climate change.~~

~~Further detail on our voting approach is included in the Corporate Governance & Voting Guidelines~~

5.3 Climate change (no change to narrative -but reordered after thematic issues)

5.4 Asset Class Considerations

¹ World Economic Forum

Whilst the specific aspects and form of ESG integration and stewardship vary across asset classes, the overarching principles outlined in this policy are applied to all assets of Border to Coast. More information on specific approaches is outlined below.

5.5 Listed equities (Internally managed) (no change)

5.6 Fixed income (no change)

5.7 Private Markets (no change)

5.7 Real Estate (no change)

5.7 Externally Managed Assets~~External Manager Selection~~

RI is incorporated into the external manager appointment process including the request for proposal (RFP) criteria and scoring and the investment management agreements. The RFP includes specific requirements relating to the integration of ESG by managers into the investment process which includes assessing and mitigating climate risk, and their approach to engagement. We expect to see evidence of how material ESG issues are considered in research analysis and investment decisions. Engagement needs to be structured with clear aims, objectives and milestones.

Voting is carried out by Border to Coast for both internally and externally managed equities where possible and we expect external managers to engage with companies in alignment with the Border to Coast RI Policy and to support our Net Zero commitment.

The monitoring of appointed managers also includes assessing stewardship and ESG integration in accordance with our policies. All external fund managers are expected to be signatories or comply with international standards applicable to their geographical location. We encourage managers to become signatories to the UN-supported Principles for Responsible Investment² ('PRI') and will consider the PRI assessment results in the selection and monitoring of managers. We also encourage managers to make a firm wide net zero commitment and to join initiatives that drive industry wide collaboration on systemic issues~~the Net Zero Asset Manager initiative (NZAM) or an equivalent initiative~~. Managers are required to report to Border to Coast on their RI activities quarterly.

6.2 Engagement

We define company engagement as actively using our influence for business change or better disclosure. We believe there should be a point of difference with company management, with examples including letters or meetings to request changes to business strategy, governance, or capital expenditure, or requesting disclosure of metrics or policy not currently in the public domain.

~~The best way to influence companies is through engagement; therefore, Border to Coast will not divest from companies principally on social, ethical or environmental reasons. As responsible investors, the approach taken is to influence companies' governance standards,~~

² The UN-supported Principles for Responsible Investment (PRI) is the world's leading advocate for responsible investment enabling investors to publicly demonstrate commitment to responsible investment with signatories committing to supporting the six principles for incorporating ESG issues into investment practice.

~~environmental, human rights and other policies by constructive shareholder engagement and the use of voting rights.~~

The services of specialist providers may be used when necessary to identify issues of concern. Meeting and engaging with companies are an integral part of the investment process. As part of our stewardship duties, we monitor investee companies on an ongoing basis and take appropriate action if investment returns are at risk. Engagement takes place between portfolio managers and investee companies across all markets where possible.

Border to Coast has several approaches to engaging with investee holdings:

- Border to Coast ~~and all eleven Partner Funds are~~ is a members of the Local Authority Pension Fund Forum ('LAPFF'). Engagement takes place with companies on behalf of members of the Forum across a broad range of ESG themes.
- We seek to work collaboratively with other like-minded investors and bodies in order to maximise Border to Coast's influence on behalf of Partner Funds, particularly when deemed likely to be more effective than acting alone. This is achieved through actively supporting investor RI initiatives and collaborating with various other external groups e.g. LAPFF, the Institutional Investors Group on Climate Change, other LGPS pools and other investor coalitions.
- Due to the proportion of assets held in overseas markets it is imperative that Border to Coast is able to engage meaningfully with global companies. To enable this and complement other engagement approaches, Border to Coast use an external Voting and Engagement service provider. We provide input into new engagement themes which are considered to be materially financial, selected by the external engagement provider on an annual basis, and also participate in some of the engagements undertaken on our behalf.
- Engagement takes place with companies in the internally managed portfolios with portfolio managers and the Responsible Investment team engaging directly across various engagement streams; these cover environmental, social, and governance issues as well as UN Global Compact³ breaches or OECD Guidelines⁴ for Multinational Enterprises breaches.
- We expect external managers to engage with investee companies and bond issuers as part of their mandate on our behalf and in alignment with our RI policies. We recognise the importance of engaging directly with our external managers to support the development and improvement of their own stewardship practices. This includes encouraging stronger ESG integration, more effective engagement strategies, and transparent reporting on stewardship outcomes.

³ UN Global Compact is a shared framework covering 10 principles, recognised worldwide and applicable to all industry sectors, based on the international conventions in the areas of human rights, labour standards, environmental stewardship and anti-corruption.

⁴ OECD Guidelines for Multinational Enterprises are recommendations providing principles and standards for responsible business conduct for multinational corporations operating in or from countries adhering to the OECD Declaration on International and Multinational Enterprises.

Engagement conducted with investee holdings can be broadly split into two categories: engagement based on financially material ESG issues, or engagement based on (potential) violations of global standards such as the UN Global Compact or OECD Guidelines for Multinational Enterprises.

When engagement is based on financially material ESG issues, engagement themes and companies are selected in cooperation with our engagement service provider based on an analysis of financial materiality. Such companies are selected based on their exposure to the engagement topic, the size and relevance in terms of portfolio positions and related risk.

For engagement based on potential company misconduct, cases are selected through the screening of news flows to identify breaches of the UN Global Compact Principles or OECD Guidelines for Multinational Enterprises. Both sets of principles cover a broad variety of basic corporate behaviour norms around ESG topics. Portfolio holdings are screened on the validation of a potential breach, the severity of the breach and the degree to which management can be held accountable for the issue. For all engagements, SMART⁵ engagement objectives are defined.

In addition, internal portfolio managers and the Responsible Investment team monitor holdings which may lead to selecting companies where engagement may improve the investment case or can mitigate investment risk related to ESG issues. Members of the Investment Team have access to our engagement provider's thematic research and engagement records. This additional information feeds into the investment analysis and decision making process.

We encourage companies to improve disclosure in relation to ESG and to report and disclose in line with the TCFD recommendations.

As a responsible investor we also engage with regulators, public policy makers, and other financial market participants on systemic risks to help create a stable environment to enhance long-term returns.

6.2.2. Escalation

Border to Coast believes that engagement and constructive dialogue with the companies in which we invest is more effective than excluding companies. If engagement does not lead to the desired result, Border to Coast will escalate engagement when required, including holding the board of directors and individual directors to account, which we believe to be the most effective consequence of an inadequate response.

The board is responsible for setting the company's strategy, overseeing risk, and for exercising accountability to shareholders. Companies whose boards are not responsive to shareholders may struggle to protect long-term value effectively. Votes against directors can demonstrate that a board is out of step with shareholders and may have tangible consequences for individuals, which can include potential removal from the board, reduced compensation, limited committee assignments, and fewer directorships at other firms.

- A lack of responsiveness to engagement by a company can result in:

⁵ SMART objectives are: specific, measurable, achievable, relevant and time bound.

- conducting collaborative engagement with other institutional shareholders.
- writing to the chair of the board or director with oversight responsibility for the issue under engagement.
- registering concern by voting on related agenda items at shareholder meetings.
- registering concern by voting against the re-election of the chair of the board, or the chair or members of the committee with the closest oversight responsibilities.
- attending a shareholder meeting in person.
- making public statements.
- publicly pre-declaring our voting intentions ahead of AGMs.
- filing/co-filing shareholder resolutions.

If the investment case has been fundamentally weakened, which may be the result of a company failing to address the risk or concern under engagement, the portfolio manager may decide to reduce or exit the position. This decision rests solely with the portfolio manager.

Border to Coast will also escalate engagement on a sector basis, particularly where systemic and portfolio risks are concentrated, and the sector has been subject to significant collaborative engagement over a prolonged period. Sector engagement escalation includes strengthening the voting policy specifically for that sector and public pre-declaration of votes against management for companies in that sector.

~~Border to Coast believe that engagement and constructive dialogue with the companies in which it invests is more effective than excluding companies from the investment universe. However, if engagement does not lead to the desired result escalation may be necessary. A lack of responsiveness by the company can be addressed by conducting collaborative engagement with other institutional shareholders, registering concern by voting on related agenda items at shareholder meetings, attending a shareholder meeting in person, making a public statement, publicly pre-declaring our voting intention, and filing/co-filing a shareholder resolution. If the investment case has been fundamentally weakened, the decision may be taken to sell the company's shares.~~

6.2.3 Exclusions

~~We believe that using our influence through ongoing engagement with companies, rather than divestment, drives positive outcomes. This is fundamental to our responsible investment approach. Our investment approach is not to divest or exclude entire sectors, however there may be specific instances when we will look to sell or not invest in some industries based on investment criteria and, the investment time horizon, and the likelihood for success in influencing company strategy and behaviour.~~

When considering whether a company is a candidate for exclusion, we do so based on the associated material financial risk of a company's business operations and whether we have concerns about its long-term viability. We initially assess the following key financial risks:

- regulatory risk
- litigation risk

- reputational risk
- social risk
- environmental risk

Thermal coal and oil sands:

Using these criteria, due to the potential for stranded assets and the significant carbon emissions of certain fossil fuels, we will not invest in public or private market companies ~~or illiquid assets~~ with more than 25% of revenues derived from the extraction of thermal coal and oil sands, unless there are exceptional circumstances. We will continue to monitor companies with such revenues for increased potential for stranded assets and the associated investment risk which may lead to the revenue threshold decreasing over time.

We will exclude public market companies in developed markets with ~~>25~~⁵⁰% revenue derived from thermal coal power generation. For public market companies in emerging markets the revenue threshold is ~~>50~~⁷⁰%, this is to reflect our support of a just transition towards a low-carbon economy which should be inclusive and acknowledge existing global disparities. We recognise that not all countries are at the same stage in their decarbonisation journey and need to consider the different transition timelines for emerging market economies. We will assess the implications of the exclusion policy and where we consider it appropriate, may operate exceptions.

Any public market companies excluded will be reviewed with business strategies and transition plans assessed for potential reinstatement.

Controversial weapons:

Certain weapons are considered to be unacceptable as they may have an indiscriminate and disproportional impact on civilians during and after military conflicts. Several International Conventions and Treaties have been developed intended to prohibit or limit their use. We will therefore not invest in companies contravening the Anti-Personnel Landmines Treaty (1997), Chemical Weapons Convention (1997), the Biological Weapons Convention (1975), and the Convention on Cluster Munitions (2008). It is illegal to use these weapons in many jurisdictions,

and in some countries legislation also prohibits the direct and indirect financing of these weapons. Therefore, as a responsible investor we will not invest in the following, where public and private market companies are contravening the above treaties and conventions:

- Companies where there is evidence of manufacturing such whole weapons systems.
- Companies manufacturing components that were developed or are significantly modified for exclusive use of such weapons.

~~Companies that manufacture "dual-use" components, such as those that were not developed or modified for exclusive use in cluster munitions, will be assessed and excluded on a case-by-case basis.~~

Dual-use components, in the context of controversial weapons, refer to goods or technologies that have the potential for both civilian and military applications. Where our screening identifies companies potentially involved in the manufacture of such components used in controversial weapons, we will endeavour to assess whether credible evidence supports such a link

We seek to apply our screening approach in private markets where practicable. However, we recognise that, due to limited disclosure and less accessible information on business involvement, de minimis exposure may occur.

Restrictions relate to the corporate entity only and not any affiliated companies. Any companies excluded will be monitored and assessed for progress and potential reinstatement at least annually. We aim to implement our exclusion list promptly and efficiently. However, short-term holdings may arise due to timing gaps between list updates and application, fund transitions, or legacy positions. These holdings are not intentional and are managed to ensure alignment as soon as is practicable with our exclusion policies.

9. Training and ~~Assistance~~Support

Border to Coast offers the Partner Funds training on RI and ESG issues. Where requested, ~~assistance~~support is given on identifying ESG risks and opportunities in order to help develop individual fund policies and investment principles for inclusion in the Investment Strategy Statements.

The Investment Team receive training on RI and ESG issues with ~~assistance and~~ input from ~~our Voting & Engagement Partner~~the RI team and other experts where required. Training is also provided to Border to Coast colleagues, the Board and the Joint Committee as and when required.