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Investment Management



Responsible Investment Framework

Introduction

TPT Investment Management (TPTIM) Responsible Investment (RI) Framework reflects our commitment to integrating environmental, social and governance (ESG) considerations across investment activities and our focus on a strong active ownership approach. As stewards of our clients’ assets, we recognise that RI is essential for long-term value creation, effective risk management and meaningful contributions to a sustainable global economy.

Our framework establishes clear guidelines and policies on key RI areas, including climate change, deforestation, human rights and stewardship.

We recognise that best practices in RI evolve and are dedicated to maintaining and enhancing this framework to reflect industry advancements, regulatory changes, and feedback from our clients and stakeholders. The framework is reviewed annually to ensure it continues to support our strategic objectives and provides a robust foundation for RI and stewardship.

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Climate Change

TPTIM is committed to addressing climate change as a core element of our RI approach. We recognise that climate change presents significant risks and opportunities for long-term asset performance and that a global transition to a low-carbon economy is necessary to protect the value of our investments. Our climate change strategy is aligned with the goals of the Paris Agreement and we are committed to supporting a pathway to net-zero greenhouse gas emissions by 2050.

By integrating climate considerations into our investment process, monitoring portfolio emissions and actively engaging with investment managers, companies, industry bodies and regulators, we aim to manage climate-related risks and capitalise on opportunities within a transitioning global economy. Our approach seeks not only to safeguard portfolio value for our clients but also to contribute positively to the urgent and necessary climate transition.

Integration of Climate Change into the Investment Process

We integrate climate-related risks and opportunities into our investment process. This involves:

- **Manager Selection and Monitoring:** When appointing investment managers, we assess the extent to which climate change risks are integrated into their investment processes. We prioritise managers who can demonstrate robust integration of climate factors and alignment with our RI approach, including the provision of regular reporting on climate-related activities. All external managers undergo rigorous RI assessments and are monitored on an ongoing basis to ensure alignment with our objectives.
- **Portfolio-Level Climate Risk Analysis:** We assess climate-related risks, including transition and physical risks, across our portfolio and use tools such as scenario analysis to evaluate how different climate pathways may impact our investments.
- **Active Ownership:** As a long-term investor, TPTIM prioritises engagement over divestment. We believe that active ownership is essential for driving meaningful change. Our engagement with investment managers and investee companies on climate-related issues focuses on:
 - **Setting Climate Targets:** We encourage companies to adopt science-based targets for greenhouse gas emissions reductions aligned with net-zero by 2050.
 - **Climate Governance and Risk Management:** We advocate for robust climate governance frameworks, asking companies to assign board-level responsibility for climate-related risks and regularly disclose climate risk assessments and management strategies.
 - **Transparent Reporting:** We ask investee companies to provide transparent and consistent disclosures on climate-related activities and impacts in line with the Task Force on Climate-related Financial Disclosures (TCFD).

Investment in Climate Solutions

The transition to clean energy is critical for mitigating climate change and achieving global carbon reduction targets. TPTIM actively supports the shift to a low-carbon economy through strategic investments in climate risk mitigation opportunities, with a particular emphasis on renewable energy strategies.

Since 2016, we have allocated dedicated capital to renewable energy generation and supporting technologies, underscoring our long-term commitment to sustainability and the climate transition.

We are committed to identifying additional opportunities across the climate and natural capital sectors to further diversify our portfolio while delivering measurable real-world impact.

Collaborative Initiatives and Policy Advocacy

TPTIM is dedicated to driving climate action across the investment community and the broader economy. We actively engage in industry initiatives that promote alignment with a low-carbon future, leveraging memberships in key industry groups and collaborations to accelerate progress on climate change. In addition, we advocate for policies that support a just transition and encourages investee companies to align their lobbying activities with their climate commitments.

For more details on our memberships and collaborations, please visit our [RI page](#).

Our Approach to Fossil Fuel-Related Investments

The energy transition requires a significant reduction in fossil fuel consumption. We acknowledge that certain activities in particular, such as thermal coal mining, oil sands extraction and Arctic drilling, are fundamentally misaligned with the ambition to achieve net-zero emissions. While fossil fuel investments represent a minimal portion of our portfolio, we are committed to phasing out these activities strategically and equitably, in line with our net-zero objectives.

Our preference is to allocate clients' capital to asset managers who actively contribute to net-zero goals and participate in collaborative efforts, such as the Net Zero Asset Managers initiative. While some of our investment managers implement exclusion policies for fossil fuels, we do not mandate exclusions across all managers. Instead, we require managers to establish clear policies for managing fossil fuel-related investments. These policies should include robust engagement strategies to assess company progress against global climate commitments and to ensure that fossil fuel companies develop credible, 1.5°C-aligned transition plans, as defined by the International Energy Agency's Net Zero Scenario.

Our approach focuses on driving real-world impact, emphasising engagement over exclusion. However, we recognise that effective stewardship necessitates a well-defined escalation framework, including divestment where engagement fails to yield meaningful progress.

Further details on our escalation process can be found later in this Framework.

Climate-Related Reporting and Accountability

Transparency is a key element of TPTIM's Climate Change Policy. We report on our progress regularly detailing portfolio emissions, climate exposure, and engagement outcomes. We are dedicated to providing stakeholders with clear insights into our climate strategy and the results of our efforts to mitigate climate risks and support the transition to a sustainable, low-carbon economy.

Conflicts of Interest in Relation to Stewardship

TPTIM is committed to maintaining the highest standards of integrity, transparency and accountability across its activities. We acknowledge that conflicts of interest may arise, including in areas involving RI and stewardship. Our publicly available Conflicts of Interest Policy outlines the overarching framework for identifying and managing conflicts of interest. This policy complements it by detailing TPTIM's specific approach to identifying, managing and mitigating potential conflicts related to stewardship, ensuring all decisions align with the best interests of our clients.

Scope

This policy applies to all TPTIM employees, contractors, board members and any third-party service providers engaged in RI and stewardship activities on behalf of TPTIM. It specifically addresses conflicts that may arise in the course of voting, engagement and other stewardship responsibilities.

Identifying Conflicts of Interest

Conflicts of interest may arise in various forms, including:

- **Corporate Relationships:** TPTIM's relationships with external investment managers, service providers or investee companies may lead to conflicts, particularly where TPTIM has existing or potential commercial interests.
- **Personal Interests:** Employees or board members of TPTIM may have personal investments or relationships with companies that are part of TPTIM's portfolio or that TPTIM engages with on RI issues.
- **Policy and Advocacy:** TPTIM's public policy engagement activities may present conflicts if our advocacy positions could affect the commercial interests of TPTIM or its investee companies.

Managing and Mitigating Conflicts of Interest

TPTIM is committed to managing conflicts in a fair and transparent manner. The following measures are implemented to identify, manage and mitigate conflicts:

- **Consistent Guidelines:** Decisions related to voting, engagement and stewardship activities are made in line with an agreed stewardship plan. TPTIM has established voting guidelines to guide decisions in a way that aligns with our RI principles. TPTIM's approach to engagement with investee companies is rooted in our commitment to RI, focusing on sustainability and stewardship goals. Engagement is conducted based on a consistent set of principles.

- **Disclosure and Transparency:** TPTIM publicly discloses its voting and engagement activities and any relevant affiliations or memberships that could lead to conflicts of interest. When participating in collaborative engagement initiatives, TPTIM evaluates any potential conflicts that could arise from partnerships or affiliations and makes adjustments to its level of participation or communication as necessary.
- **Third-Party Oversight:** TPTIM requires all third-party investment managers to disclose any conflicts that could impact their RI or stewardship activities.

Reporting and Accountability

TPTIM is committed to transparency and accountability in the management of conflicts of interest. We report annually on our RI and stewardship activities, including how conflicts of interest have been identified and managed via our Annual Stewardship Report.

Controversial Weapons

TPTIM recognises that investments in the defence sector pose particular risks, particularly concerning the development, production and trade of controversial weapons that are restricted under international conventions. We are committed to avoiding investments that are misaligned with international standards of responsible conduct. We do not invest in companies involved in the production, sale or maintenance of specific controversial weapons prohibited by these conventions.

Background on International Standards and Restrictions

International Humanitarian Law aims to protect non-combatants and limit the use of warfare methods that cause indiscriminate harm or disproportionate suffering. In alignment with these principles, TPTIM adheres to the following international legal instruments ratified by the UK and other governments:

- **Biological and Toxin Weapons Convention (BTWC):** Prohibits the development, production, and stockpiling of biological and toxin weapons.
- **Chemical Weapons Convention (CWC):** Bans chemical weapons and requires the destruction of existing stockpiles.
- **Convention on Certain Conventional Weapons (CCW):** Seeks to limit or ban certain conventional weapons that cause excessive injury or have indiscriminate effects.
- **Convention on Cluster Munitions (CCM):** Prohibits all use, stockpiling, production and transfer of cluster munitions.
- **Mine Ban Treaty (MBT):** Prohibits anti-personnel mines and requires the clearance of mined areas.
- **Nuclear Non-Proliferation Treaty (NPT):** Limits the possession and development of nuclear weapons to specific nuclear-weapon states.

Exclusion Policy

TPTIM excludes investments in companies that engage in the following activities, as these are inconsistent with our values and international humanitarian norms:

1. Anti-Personnel Mines
2. Biological Weapons
3. Chemical Weapons
4. Cluster Munitions
5. Nuclear Weapons in countries not party to the Non-Proliferation Treaty

We define corporate involvement in controversial weapons as the development, production, stockpiling, sale, or maintenance of controversial weapons or their key components.

Implementation Approach

Our policy on controversial weapons is designed to avoid investments in companies whose activities are deemed unacceptable by international conventions. However, due to the complexity of TPTIM's portfolio, total avoidance may not always be practicable across all asset classes and investment strategies, particularly with regard to derivatives and indirect investments where TPTIM lacks control over the specific assets held. The exclusion of companies involved in controversial weapons applies to physical equities and corporate bonds where TPTIM has direct control over the investment guidelines that determine what assets can be held. Where TPTIM lacks control over the specific assets held, we adopt a "comply or explain" approach. Investment managers are expected to either comply with our exclusion criteria or provide an explanation if compliance is not feasible.

Quarterly Review

To ensure adherence to this policy, TPTIM conducts quarterly monitoring and auditing of holdings, updating its exclusion list of publicly listed companies involved in controversial weapons. Our process includes:

- **Exclusion List Update:** TPTIM reviews and updates the exclusion list quarterly based on the latest data and research regarding companies' involvement in controversial weapons.
- **Audits of Portfolio Holdings:** We perform an audit of portfolio holdings to verify compliance with our exclusion criteria.

Escalation

We have a clear escalation approach when external managers and / or investee companies fall short of our RI and stewardship expectations. Further details of our escalation policies are described later in this Framework.

Deforestation

TPTIM acknowledges that deforestation poses severe environmental, social and economic risks, contributing significantly to climate change, biodiversity loss and the degradation of vital ecosystem services. As a responsible investor, we are committed to advancing sustainable practices and supporting global efforts to protect and restore forests. We believe that addressing deforestation aligns with our objective of generating sustainable, long-term returns while supporting a more resilient planet.

Our Approach

Our deforestation strategy targets high-risk sectors and companies with a history of deforestation practices, with a focus on driving impactful change through engagement. We prioritise dialogue with companies most exposed to deforestation risks, including those involved in the production and supply of commodities like palm oil, soy, beef and timber, as well as investments in infrastructure projects with potential deforestation impacts.

We actively encourage companies in high-risk sectors to adopt robust zero-deforestation policies and practices. This includes:

- **Commitment to Zero Deforestation:** Companies must commit to a zero-deforestation supply chain, ensuring that their products do not contribute to the clearing of primary or secondary forests.
- **Transparent Supply Chains:** We expect companies to map and disclose their supply chains for commodities associated with deforestation, providing transparency about sourcing origins and potential risks.
- **Certification and Standards Compliance:** TPTIM encourages adherence to credible, deforestation-free certification standards, such as the Roundtable on Sustainable Palm Oil (RSPO), Forest Stewardship Council (FSC) and the Accountability Framework initiative. Compliance with these standards demonstrates a commitment to responsible sourcing practices.

Collaborative Action and Policy Advocacy

TPTIM is committed to industry collaboration and policy engagement to drive systemic change. We participate in initiatives aimed at eliminating deforestation from global financial portfolios, advocating for industry-wide standards and policies that promote zero-deforestation supply chains. We also encourage companies within our portfolio to align their lobbying activities with deforestation-free goals, supporting a sustainable and resilient global economy.

Collaboration with Investment Managers

TPTIM works closely with its investment managers to integrate deforestation risk management into investment selection, monitoring and engagement practices. Investment managers are expected to actively engage with

investee companies on deforestation risks and report on the outcomes of these engagements to ensure alignment with our RI goals.

Monitoring and Reporting

To deepen our understanding of our portfolio's impact on nature, particularly on deforestation, we have partnered with an external ESG provider to obtain biodiversity and deforestation data. We aim to report annually on our deforestation-related activities, progress and outcomes, including the effectiveness of our engagements with high-risk companies and the deforestation risk profile of our portfolio. We use frameworks like the Accountability Framework initiative and guidance from Global Canopy to benchmark and assess our progress against industry standards, ensuring that our approach remains effective and relevant.

Diversity, Equity and Inclusion

At TPTIM, we are committed to fostering Diversity, Equity and Inclusion (DEI) within our investment processes. TPTIM's commitment to DEI in investment reflects the broader organisational values articulated in the TPT Group Equality and Diversity Policy. As a group, we strive to operate inclusively, ensuring equitable opportunities in recruitment, development and workplace culture. By embedding these principles into our investment approach, we aim to reinforce their importance both internally and externally, as well as enhance decision-making, governance and long-term outcomes for our clients.

Key Principles

- 1. Promote DEI in Investment Practices:** Encourage external managers and investee companies to demonstrate best practices in DEI.
- 2. Enhance Due Diligence:** Assess DEI metrics as part of the selection and monitoring processes for external managers.
- 3. Drive Progress through Engagement:** Engage with investee companies to promote diverse leadership, equitable practices and inclusive corporate cultures.
- 4. Align with Standards and Initiatives:** Support global DEI frameworks and collaborate with other investors and organisations.

Our Approach

1. External Investment Manager Due Diligence

- **Selection Criteria:** Incorporate DEI as a factor in the assessment of potential managers, evaluating policies, practices and outcomes.
- **Ongoing Monitoring:** Conduct regular reviews of managers' DEI performance, including metrics such as workforce diversity, gender pay gaps and board representation.
- **Engagement Expectations:** Encourage managers to embed DEI into their own investment processes and active ownership strategies (voting and engagement).

2. Engagement with Investee Companies

- **Leadership Diversity:** Engage with companies to promote diversity within boards and executive teams, emphasising the value of diverse perspectives.
- **Inclusive Practices:** Advocate for equitable hiring, retention and promotion practices, with a focus on underrepresented groups.

- **Transparency and Reporting:** Encourage companies to enhance disclosures on DEI policies, targets and progress, leveraging frameworks such as the Global Reporting Initiative (GRI).

3. Advocacy and Collaboration

- **Partnerships with Industry Groups:** Collaborate with organisations such as industry bodies, professional networks and think tanks to promote the adoption of DEI best practices.
- **Engagement in Policy Advocacy:** Advocate for regulatory and policy frameworks that promote DEI.
- **Collaborative Engagements with Co-Investors:** Work with other investors to collectively engage with investee companies, leveraging our shared influence.

Engagement

As a responsible investment manager, TPTIM is dedicated to active ownership, aiming to drive long-term value, enhance risk management and support positive real-world outcomes. We recognise our duty to act as responsible stewards of the assets we manage for our clients. This includes leveraging our rights to influence corporate behaviour through voting and engagement, as well as contributing to policy and regulatory development by working with governments, regulators and industry bodies.

Engagement Approach

Engagement by Investment Managers

We delegate the primary responsibility for corporate engagement to our selected investment managers. We believe these managers are well-positioned to engage effectively with portfolio companies on ESG issues, given their expertise and close access to corporate management. With the diversity and volume of holdings in our portfolio, this approach ensures practical and impactful engagement.

We expect our managers to focus on material ESG factors that influence the investment case and to address specific ESG concerns raised by us. We monitor our managers' engagement responsiveness, ensuring alignment with our principles and values. When TPTIM's engagement themes align with those of our investment managers, we may collaborate in joint engagement activities, presenting a unified stance to amplify our impact.

Collaborative Engagement

TPTIM participates in collaborative engagement initiatives with other investors and stakeholders, reinforcing our RI Framework and stewardship priorities. We actively assess and pursue collaborative opportunities that expand our stewardship reach and impact. We also work to promote a well-functioning financial system by participating in industry initiatives. This includes engaging with industry bodies, responding to consultations, joining working groups and participating in collaborative initiatives that support market development and strengthen financial markets.

Direct Engagement

Each year, we define stewardship priorities that guide our direct engagement activities. These priorities are shared with our investment managers, fostering an alignment of goals and ensuring focus on key themes. Our annual engagement plan, implemented by the Investment Management Team, centers on targeted engagement with select priority companies, aiming for measurable outcomes that enhance ESG performance and contribute to sustainable value creation.

Engagement Activities and Reporting

We request regular reporting from our investment managers on their engagement activities, providing insight into how they address ESG risks and opportunities within our holdings. Where possible, we share engagement highlights through website updates and our Annual Stewardship Report. The report summarises our engagement activities, key themes, progress and outcomes aligned with our stewardship priorities. We include case studies to illustrate the impact of our engagement with investee companies and external managers.

Escalation Policy

TPTIM is dedicated to advancing RI through active engagement and stewardship. We collaborate closely with both external managers and investee companies to promote strong ESG practices. This policy outlines our escalation approach when either external managers or investee companies fall short of our RI and stewardship expectations.

Escalation Strategy for Engagement with External Managers

We rely on external managers to implement investment strategies in alignment with our objectives and RI strategy. Where an external manager does not meet our ESG expectations, this escalation strategy guides our response to encourage compliance and support alignment with our standards.

Triggers for Escalation with External Managers

Escalation may be initiated if an external manager:

- Fails to integrate ESG considerations in a manner consistent with TPTIM's RI Framework.
- Does not meet agreed-upon standards or milestones for RI or ESG reporting.
- Lacks transparency in stewardship practices, such as voting and engagement activities.
- Engages in practices that contradict TPTIM's core ESG priorities, including those related to climate change, human rights and governance.

Escalation Process and Stages

The escalation process with external managers follows a structured approach, with increasing intensity based on the manager's responsiveness and commitment to improvement.

Stage 1: Initial Discussion and Feedback

- **Objective:** Raise initial concerns and encourage adjustments.
- **Actions:** The Investment Management Team communicates specific concerns to the external manager, requesting clarity on ESG policies, recent actions, or plans for improvement plans.

Stage 2: Formal Request for Remediation

- **Objective:** Address unresolved issues through a formalised response.
- **Actions:** TPTIM issues a formal letter to the manager's senior leadership, setting out detailed concerns, expected standards and timelines for remediation. Additional reporting or monitoring may also be requested.

Stage 3: Enhanced Monitoring and Conditional Relationship

- **Objective:** Monitor progress closely and implement conditions to ensure alignment with TPTIM's standards.
- **Actions:** TPTIM may impose conditions on the manager relationship, such as additional reporting or regular progress updates.

Stage 4: Termination of Relationship

- **Objective:** End the relationship if the manager consistently fails to meet TPTIM's RI expectations.
- **Actions:** As a last resort, TPTIM may terminate the mandate with the external manager if previous escalation steps fail to drive necessary changes and if continuing the relationship presents a material risk to TPTIM's RI goals.

Escalation Strategy for Engagement with Investee Companies

As an investment manager without direct stock-picking discretion, TPTIM's array of escalation tactics relies heavily on collaboration with external managers. We seek to understand our managers' policies on engagement escalation and what actions they consider when there is a persistent lack of response to engagement, adverse behaviour, or violation of policies and best practice. We also request examples of escalation in quarterly reporting.

Triggers for Escalation with Investee Companies

Escalation with investee companies may be triggered when:

- A company fails to meet expectations related to material ESG issues.
- The company shows limited responsiveness or progress on engagement topics.
- Significant ESG controversies or incidents arise, posing reputational, operational, or financial risks that may impact TPTIM's investments.

Escalation Process and Stages

TPTIM escalates with investee companies primarily through coordinated efforts with external managers and collaborative engagements.

Stage 1: Direct Engagement

- **Objective:** Inform the company of our concerns and actions we would like to see implemented.
- **Actions:** TPTIM contacts the company, outlines the issue and requests a response.

Stage 2: Collaborative Engagement and Industry Initiatives

- **Objective:** Raise concerns with external managers to encourage coordinated engagement with the investee company. Leverage collective influence to address ESG issues through collaborative efforts.
- **Actions:** TPTIM communicates concerns to the relevant external managers, requesting that they engage with the company on specific issues. TPTIM provides guidance on engagement objectives and timelines, where appropriate. Alternatively, TPTIM joins collaborative initiatives and industry alliances that seek to improve company practices on key ESG topics.

Stage 3: Public Statements and Voting Coordination

- **Objective:** Apply additional pressure on the company by coordinating shareholder voting and making public statements.

- **Actions:** Where feasible, TPTIM works with external managers to direct voting practices on resolutions related to ESG concerns at the company's AGM. In select cases, TPTIM may also issue public statements to communicate its position on significant issues or support shareholder proposals that promote responsible practices.

Stage 4: Disinvestment

- **Objective:** Signal TPTIM's final course of action when engagement efforts have not led to a satisfactory outcome
- **Actions:** In the case of segregated mandates, and as a last resort when meaningful progress has not been achieved, TPTIM may force disinvestment by amending the mandate's guidelines.

Documentation and Reporting

We document all escalation activities with external managers and investee companies, including correspondence, progress assessments and outcomes. Examples are provided in the Annual Stewardship Report.

Fund Manager Selection and Monitoring

TPTIM's RI Framework is applied across all investments, with expectations adapted to suit the distinct characteristics of various asset classes and investment styles. By tailoring our approach, we ensure that our RI objectives are embedded at every level, regardless of investment type.

In selecting and monitoring fund managers, we prioritise partnerships with those whose policies and practices align with our RI commitments. Our selection process rigorously evaluates each manager's approach to ESG integration within their investment philosophy and decision-making. This evaluation also considers the extent to which each manager's strategy supports TPTIM's goals for sustainable financial growth and long-term ESG risk mitigation.

While we do not require investment managers to be signatories to the PRI or the UK Stewardship Code, we engage with managers to understand how they embody the principles' spirit. We also review their memberships in industry bodies and their interactions with regulators and stakeholders to assess alignment with our expectations.

To formalise these expectations, we incorporate specific ESG and climate-related requirements into our due diligence process and, where possible, into the legal documents governing how the assets are managed. These agreements are tailored to mandate-specific objectives and define the level of ESG capability and transparency we expect from each manager. Mandates include provisions on how rights attached to segregated investments are exercised, such as active voting participation and a requirement to consider ESG factors in investment decisions. While we have less direct influence over investments within multi-client pooled vehicles, we still review managers' policies and compliance statements to ensure they meet our expectations and seek to codify these expectations where possible.

Ongoing Monitoring and Engagement

Manager appointments are not for fixed terms and are subject to regular review through structured monitoring processes. Each manager's approach to stewardship, climate action and ESG risk management is assessed and discussed in review meetings. Managers are also expected to report regularly on their RI and stewardship activities.

To assess performance, we employ a proprietary RI Rating System, which evaluates managers across four key areas: values, stewardship, ESG integration, and transparency. Each manager is assigned an RI Rating and quarterly reports of these ratings are agreed by TPTIM's Investment Committee as part of its ongoing oversight responsibilities.

RI Manager Rating System

Managers receive a rating from A to D, with A representing the highest level of RI integration and D the lowest. Managers are reviewed at least annually and TPTIM engages continuously to ensure alignment with our RI expectations, employing escalation strategies if necessary.

The rating guide is as follows:

- A.** Leading approach to integration of RI at investment level, with the manager being able to clearly articulate the relevance and value of RI as part of the investment philosophy. RI considerations should influence portfolio positioning. There are dedicated RI professionals or ESG champions as well as frequent and suitable RI

reporting. The manager can evidence that RI systems and processes are in place and the manager is a good 'steward' of the assets.

- B.** The firm has a satisfactory approach and is reasonably well aligned with TPTIM's expectations on RI. There is sufficient evidence of ESG integration, stewardship and reporting to demonstrate that the manager is committed to embedding its own policies.
- C.** The manager employs a 'light-touch', compliance-based approach and is not willing/intending to move beyond this. Managers in this category may also be 'new' to ESG and in the process of implementing policies and processes.
- D.** The manager has not given consideration to RI at the organisational or strategy level and/or does not see ESG as being relevant. TPTIM should seek improvements from the manager over an agreed time period.

Human Rights

TPTIM is committed to upholding human rights across all its investments. We support the principles outlined in the International Bill of Human Rights and the UN Guiding Principles on Business and Human Rights (UNGPs).

Guiding Principles for Human Rights in Investment

Alignment with International Standards

We encourage the companies in which we invest to follow the UNGPs, which provide guidelines for preventing, addressing and remedying human rights abuses in business. We believe that a commitment to human rights enhances long-term value and supports sustainable financial outcomes, benefiting both our clients and the broader communities in which our investments operate.

Human Rights Considerations in Investment and Stewardship

We integrate human rights considerations throughout our investment and stewardship processes. This is especially pertinent when appointing third-party investment managers who make security selection decisions for our portfolio. As part of our commitment to RI, we expect investment managers to incorporate human rights considerations into their decision-making processes and actively monitor human rights risks in their portfolios. We ask that our managers provide transparent reporting on their RI practices, including with respect to human rights. Managers are also expected to demonstrate clear policies, processes and ongoing improvement in addressing human rights concerns.

Risk Assessment and Monitoring

We periodically review our investment portfolio to assess risks related to ESG factors, including potential human rights impacts. Where risks to human rights are identified, we seek to understand their potential effect on the value of our investments and actively monitor company responses and improvements.

Advocacy and Collaboration

We actively engage with the wider investment community, policymakers and advocacy groups to advance respect for human rights. We are a member of organisations dedicated to the promotion and protection of human rights, and we collaborate with like-minded stakeholders to strengthen human rights standards in the investment industry. Through our partnerships and industry participation, we aim to drive positive change and contribute to the development of best practices for respecting human rights in business.

Proxy Voting

TPTIM believes that proxy voting is a crucial tool for shareholder advocacy and stewardship. We work closely with external managers to ensure that votes cast are aligned with our ESG principles.

As a substantial investor in both UK and non-UK listed companies, we are committed to being a responsible steward of assets within our portfolios. We recognise our fiduciary duty to act in the best long-term interests of our clients, ensuring that investee companies are governed responsibly and that executive management operates with sustainable, shareholder-oriented oversight. This Voting Policy outlines our approach to exercising voting rights, setting expectations for investment managers and providing oversight to ensure alignment with our RI Framework.

Voting Principles

- **Voting in All Markets**

We aim to exercise our voting rights across all markets where practicable. Voting activity is typically delegated to our appointed investment managers. However, we maintain oversight of proxy voting activity, working with external managers to align their voting practices with TPTIM's Voting Guidelines.

- **Collaboration on Key Votes**

For critical issues or high-stakes resolutions, we may issue guidance to external managers on preferred voting outcomes or, where applicable, support shareholder resolutions that promote ESG improvements.

- **Voting Guidelines**

TPTIM expects its investment managers to exercise voting rights in alignment with:

- The **Corporate Governance Policy and Voting Guidelines** issued by the Pension and Lifetime Savings Association (PLSA).
- For non-UK markets, TPTIM encourages managers to refer to local governance codes while following PLSA-aligned practices as a baseline.

Securities Lending and Voting

TPTIM maintains an active securities lending programme, which may occasionally limit voting capabilities. Where a contentious vote or a resolution relating to TPTIM's engagement activities arises, we may selectively ask to recall or restrict lending on specific securities to ensure voting rights can be exercised. This decision will be evaluated on a case-by-case basis, with input from the relevant investment manager(s) to align with TPTIM's responsible stewardship commitments.

Reporting and Monitoring

Regular Voting Data Submission

Investment managers are required to submit data on their voting activities quarterly. This reporting allows us to monitor voting alignment, review key voting decisions and assess adherence to our RI Framework.

Commitment to Transparency and Accountability

As part of TPTIM's commitment to transparency:

- We will publish annual summaries of our voting activity, including significant votes.
- Detailed case studies on pivotal voting decisions will be provided to demonstrate how voting aligns with TPTIM's RI Framework.



Get in touch

If you would like to learn more about our Responsible Investment Framework, please feel free to contact us:



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[TPTIM Responsible Investing](#)



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