



Capital Gearing Portfolio Fund

Responsible Investment Report

H2 2024

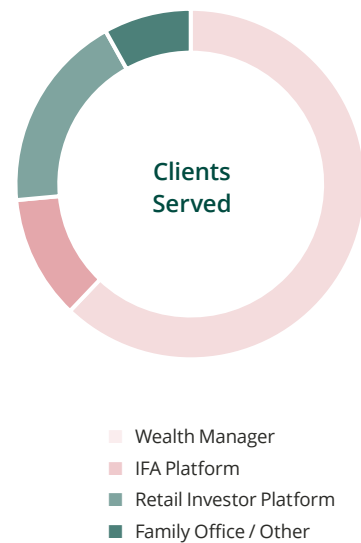
cgam

CG Asset Management

CGAM manages £2.6bn of investments on behalf of a wide range of clients, including wealth managers, independent financial advisors, private investors, family offices and charities. Wealth protection sits at the heart of everything we do.

CGAM was founded in 2000 and is majority owned by an employee ownership trust, a model pioneered by the John Lewis Partnership. Firm culture is the foundation on which all stewardship activities are built. It is our belief that our ownership structure powerfully reinforces a responsible culture and encourages alignment with our clients.

For more information, please visit:
www.cgasset.com

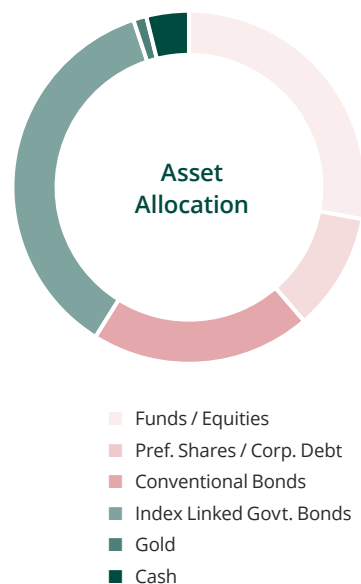


Capital Gearing Portfolio Fund

The Portfolio Fund seeks to preserve and over time to grow its shareholders' real wealth. It does so by investing into a diverse range of asset classes including government bonds, corporate bonds, preference shares, REITs and investment funds.

The investment strategy emphasises long-only asset allocation as a powerful tool to preserve capital and deliver superior investment performance over the longer term. The fund is designed for investors with a long-term time horizon, a conservative risk appetite and a preference for capital gains over income. The fund is managed without reference to a benchmark.

For more information:
www.cgasset.com/fund/capital-gearing-portfolio-fund



If you have any comments on our policies or you have input we should be considering please contact us at info@cgasset.com

Responsible Investing Approach

	Questions our stakeholders ask	Page
Principles	 What are the guiding principles that underpin CGAM's approach to responsible investing?	4
Policies	 How are these principles interpreted in policy to steer firm activity?	5
Capabilities	 How does CGAM ensure it has the resources, skills and systems to implement its policies?	7
Integration	 How are CGAM's policies reflected in investment decision making?	9
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Collaboration	 How does CGAM collaborate with third parties to amplify its impact?	14
Reporting	 How does CGAM ensure transparency and stakeholder confidence in our RI process?	15



Be honest

No greenwashing, no PR-lead initiatives, no jargon. We believe our stakeholders are best served by an accurate presentation of our activities rather than a marketing campaign dressed up in the language of stewardship.

Ethics, not mathematics

Securing appropriate data is essential to all aspects of investment decision making, including judgements around sustainability. However data has to be interpreted within a specific context. There is no formula that can be applied in a uniform way to every situation; we emphasise **judgement over simplistic third party quantitative scoring**.

Targeted

Whilst supporting positive transition might be the optimal strategy, effective engagement is time consuming. As a small firm we must focus our efforts where they will have the **most impact** rather than taking a generalist approach.

Integration, not separation

We are a small firm, and the entire team is **collectively responsible** for our stewardship activities with the ultimate responsibility lying with the chief executive. We do not have a standalone responsible investment team or ESG analysts as this does not seem to us to represent true integration.

One firm, one rule

We do not have an ethical fund range (and by implication an unethical fund range). Our **standards apply to all the funds we advise**.

Engagement over disinvestment

When investors have the influence to effect change it is most valuable to encourage **positive transition** rather than pursuing disinvestment.

Driven by governance

Improved governance leads to improved social, environmental and financial outcomes. **Investors have multiple direct mechanisms to influence governance**, so our engagement activities invariably focus on governance, even when the ultimate objective is positive social or environmental change.

Act, with humility

Every action results in both intended and **unintended consequences**. Reflect deeply on the risk that good intentions can lead to bad outcomes.



The principal document guiding CGAM's RI activities is our responsible investment policy. This policy sits alongside a number of other relevant policy documents which collectively govern our internal RI practice. All these documents are publicly available on our website and via the links below.

Policy Document	Description	
Responsible Investment Policy	Describes our overarching philosophy, practice and approach to responsible investing	↗
Climate Change Policy	Details our approach and aspiration towards climate change in more depth	↗
Engagement Policy	Summarises how we approach engagements with our investee companies and other stakeholders	↗
Voting Policy	Outlines our approach to proxy voting	↗
Equity, Diversity and Inclusion Policy	Describes how we seek to promote participation within our firm	↗
Anti-Bribery Policy	Details our firm's approach to bribery, gifts and inducements	↗

Policy formation process

Our policy documents are informed by input from a number of different parties. The policies seek to incorporate our institutional principles, client feedback and best practice as defined by industry and regulatory bodies. In addition, we take expert third party advice.

Stakeholder input into policy formation

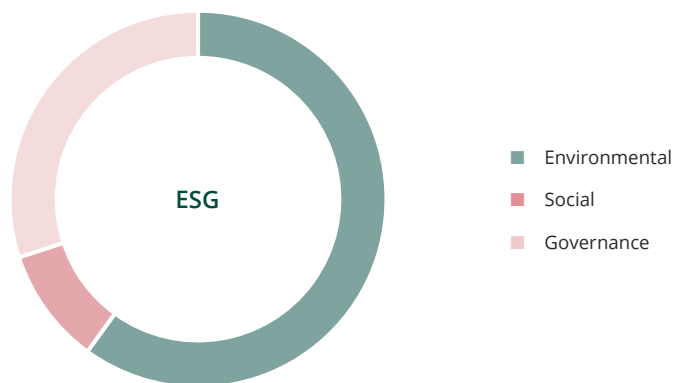
Stakeholder feedback is a central plank to our policy formation process. We use a variety of different channels to achieve stakeholder input.

Feedback type	Typical client type
Face to face feedback	Wealth manager, institutional, family offices and charities
ESG questionnaires	Wealth manager, institutional, family offices and charities
Investor surveys	Self-directed private investors



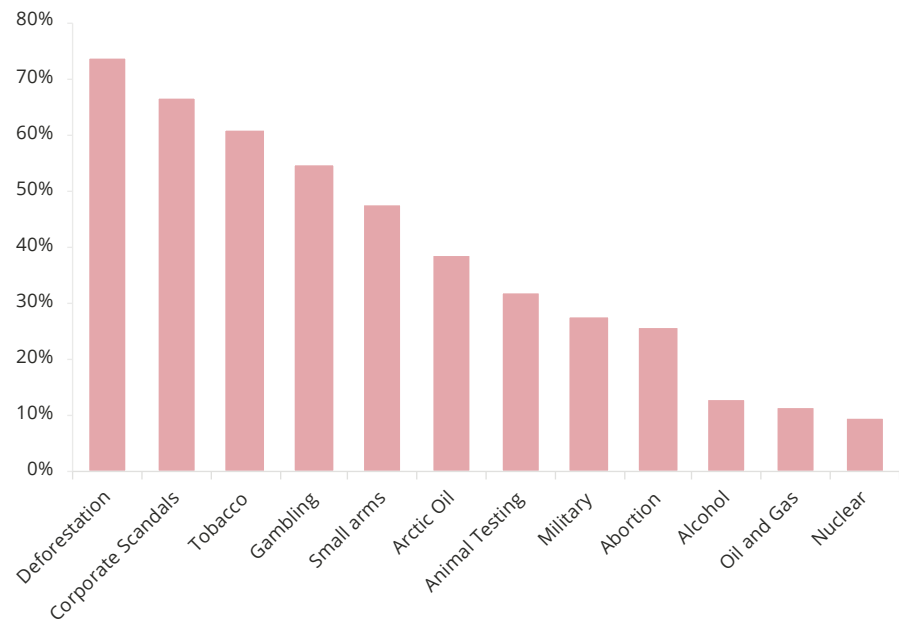
To understand the preferences of our self-directed private clients we primarily draw on investor surveys conducted by the platforms that those shareholder use. Anecdotal feedback from wealth managers suggests that the preferences of their own client base generally align with the self-directed private investors, making these broad investor surveys particularly useful.

Which area of ESG is most important to you when making investment decisions?



Source: Interactive Investor Survey

Share of investors unwilling to invest in:



Source: Hargreaves Lansdown ESG survey

If you have any comments on our policies, or you have input we should be considering, please contact us at info@cgasset.com.

Capabilities



CGAM's capacity to implement our responsible investment policies rests on having sufficient human resource available, appropriately trained and with access to the right operational systems. The body with principal responsibility for ensuring these capabilities are in place, and for the implementation of the responsible investment policy is the Responsible Investment Committee.

The RI committee is a four member body that meets quarterly. It includes members from all teams within the firm and is chaired by the Chief Executive.

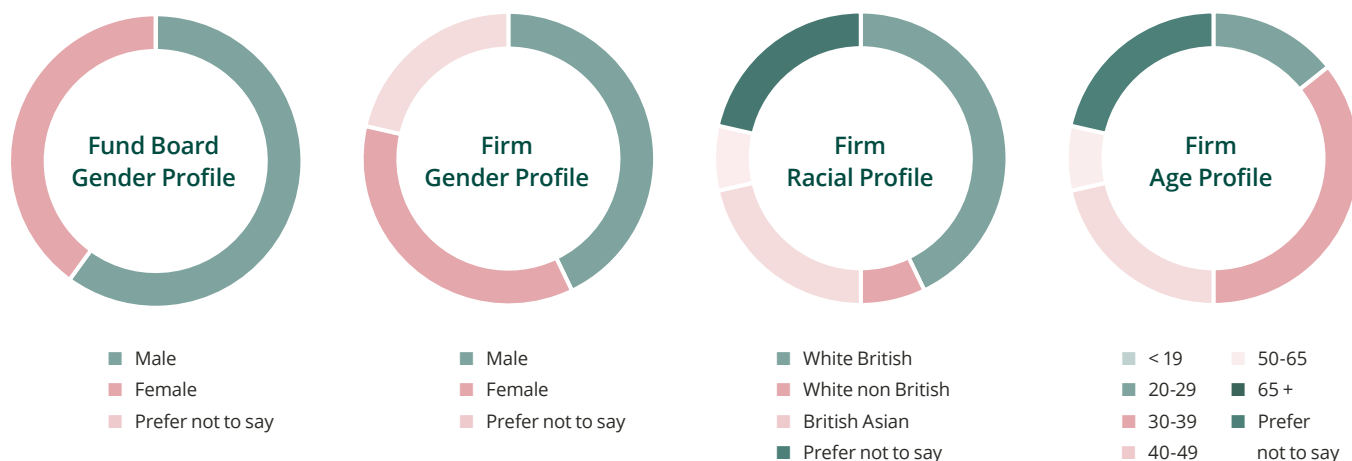
Role	Participant	Team within CGAM
Chair	Alastair Laing	Chief Executive
Member	Emma Moriarty	Investment Team
Member	Sophia Sednaoui	Investor Relations
Secretary	Amber Williams	Compliance

Third parties

CGAM works with a variety of third parties to augment our inhouse RI work, including consultants and specialist data providers. For investment integration we have access to ESG data from Bloomberg, Morningstar (Sustainalytics), MSCI Ratings and S&P Global ESG.

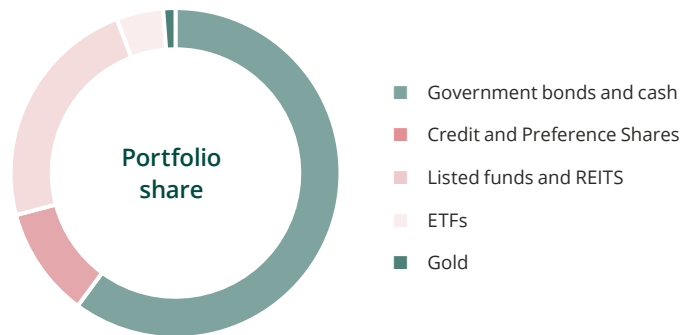
Diversity

Research suggests diverse teams that incorporate a variety of viewpoints can deliver better outcomes. As a small firm with low levels of staff turnover CGAM does not have specific diversity targets, however we are conscious of team make up and background.





The Portfolio Fund invests in diverse portfolios which incorporate a wide range of asset classes. Different asset classes lend themselves to different stewardship approaches based on data quality and the potential for CGAM to influence the issuer. Where we have less influence, we are more likely to pursue exclusions. In our assessment exclusions are a less effective and productive form of stewardship but it makes no sense to expend significant resources on engaging in areas we are less likely to impact.








Integration approach by asset class

Direct Government Securities

A majority of the assets held by the Portfolio Fund are invested in direct holdings of securities issued by governments including bonds, bills and cash. As our capacity to influence governments is extremely limited, our primary approach is to exclude sovereigns that do not maintain the very highest ESG standards.

In order to help assess these criteria we consider indices compiled by a range of NGOs and require sovereigns, at a minimum, to achieve strong rankings in at least four out of five of these criteria. In addition to using third party indices, we also overlay our own subjective assessments which typically leads to material additional exclusions.

Data Compiler	Index	Criteria
	World Bank Governance Effectiveness Index	Top quartile
	World Press Freedom Index	Good or satisfactory
	Global Freedom Score	Free rating
	UN Human Development Index	Very high human development rank
	Net Zero by 2050 Statement	Statement of intent by 2050 or earlier

¹The World Bank – Governance Effectiveness index, Reporters without Borders – World Press Freedom Index, Freedom House – Global Freedom Score, UN – Human Development Index, Net Zero by 2050 statement.



Direct Corporate Credit and Preference Shares

Capital Gearing Portfolio Fund holds relatively small quantities of direct credit and preference share holdings issued by corporate issuers. Given our small participation in the market and therefore limited influence, our primary approach is to exclude corporate issuers who are primarily engaged in the following activities:

Exclusion Area	Exclusion sub Area	Threshold
Controversial Weapons	Anti-personnel mines, cluster munitions, chemical weapons	0%
Tobacco	Manufacture or marketing	< 5%
Thermal Coal	Coal mining or coal based energy production	< 5%
Oil Sands or Arctic Drilling	Production	< 5%
Gambling	Services	< 5%
Adult Entertainment	Production or broadcasting	< 5%
Firearms	Manufacture	< 5%
Predatory Lending	Services	< 5%

Listed Closed-Ended Funds, Investment Trust, REITs, and Property Companies

CGAM has a long history of investing in the London market for listed closed ended funds and other collective investment companies including REITs. Listed investment companies are fundamentally different to operating companies and typically have the following features:

- They hold a broad portfolio of securities on behalf of their shareholders;
- They employ investment managers, who make the stock selection and proxy voting decisions relating to portfolio securities;
- They have no employees or customers; and
- They have a Board of Directors to represent shareholder interests and concerns.

From an integration perspective listed funds are effectively external managers. Hence our due diligence focuses on the board and investment manager's commitment to responsible investing as expressed in their responsible investment policy, the quality of RI reporting and their organisational culture.

Given the prominent role that directors play in investment companies there is considerable scope for engagement activities. CGAM frequently undertakes activities that aim to influence boards and ultimately improve governance. The techniques employed vary based on the specific scenario but those listed on the next page.

²We do not invest directly in companies with primary activities in these areas, although we cannot always identify immaterial non-core activities. As a result, we employ a revenue threshold in certain areas.



Activist Engagement Technique	Frequency of Employment
Management engagement	Continuous
Board engagement	Continuous
Shareholder coordination	Frequent
Voting against significant resolutions	Frequent
Raising ESG matters in fund reporting	Frequent
Amplification through press engagement	Periodic
Replacing directors to improve governance	Periodic
Publishing open letters	Periodic
Publishing research incorporating ESG views	Periodic
Threatening to requisition meetings	Periodic

As well as engagement in the sector, CGAM places particular weight on providing primary capital to high impact investment companies with an environmental or social focus. In our assessment by providing primary capital, via IPO sponsorship or follow on fund raisings, investors have a greater impact than by simply trading securities in the secondary market.

Exchange Traded Funds (“ETFs”)

Funds advised by CGAM hold relatively small quantities of exchange traded funds. ETFs are listed collective funds which typically track an index and provide low cost, efficient access to a broad portfolio of securities. CGAM does engage directly with our approved panel of ETF providers to encourage improved stewardship standards. However, our capacity for effective engagement is limited, therefore we consider exclusions where there are suitable ETFs available. Typically, this is via ESG screened ETFs which is a dynamic and growing sector. The programme of identifying and conducting due diligence on these products is ongoing and currently a little more than a third of our ESG exposure is in explicitly ESG screened ETFs. Our non ESG screened ETFs are managed by providers who have active stewardship programmes and provide regular stewardship reporting.

Case study:

iShares MSCI Japan ESG screened ETF

This ETF is the largest equity holding in the absolute return fund. The fund tracks the Japanese stock market with the exception of exposure to controversial weapons, tobacco, civilian firearms, fossil fuel extraction, palm oil, arctic oil and gas, UN Global Compact violators and severe controversies. The ETF costs are the same as non ESG screened version of the ETF.

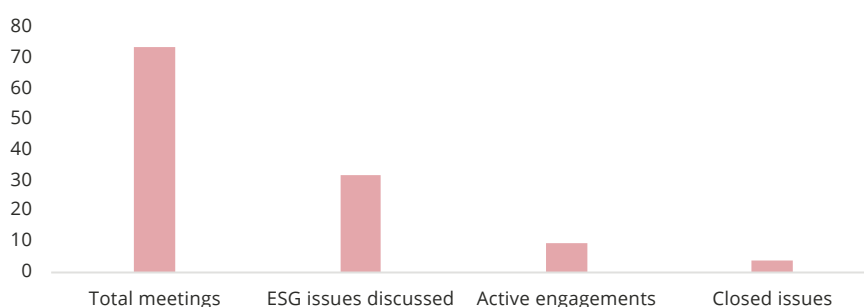


Engagement

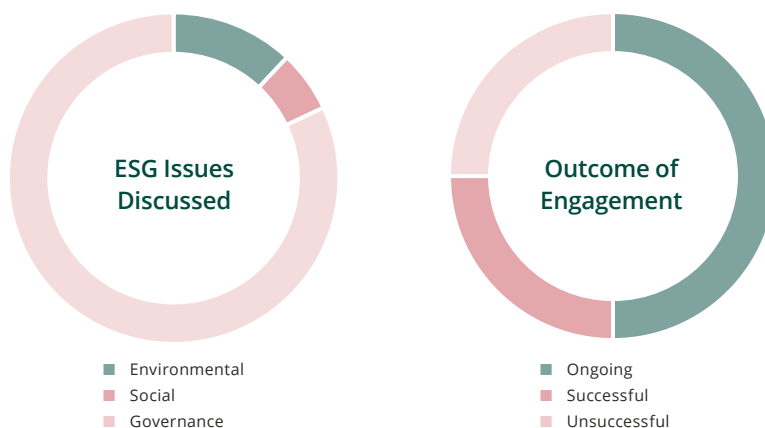
CGAM carried out a significant number of engagements in the quarter relating to securities held by the Absolute Return Fund. Every meeting we hold with an investee company is an opportunity to raise ESG related points as part of our ongoing stewardship activities. We track all these interactions as part of our engagement activity, but we do not consider every meeting to constitute an Active Engagement. For CGAM, an Active Engagement has an ongoing project with a clear objective that could realistically be achieved over a short- or medium-term time frame and almost certainly includes some form of escalation beyond talking to management.

The following charts summarise the full range of our engagement activity in the half year.

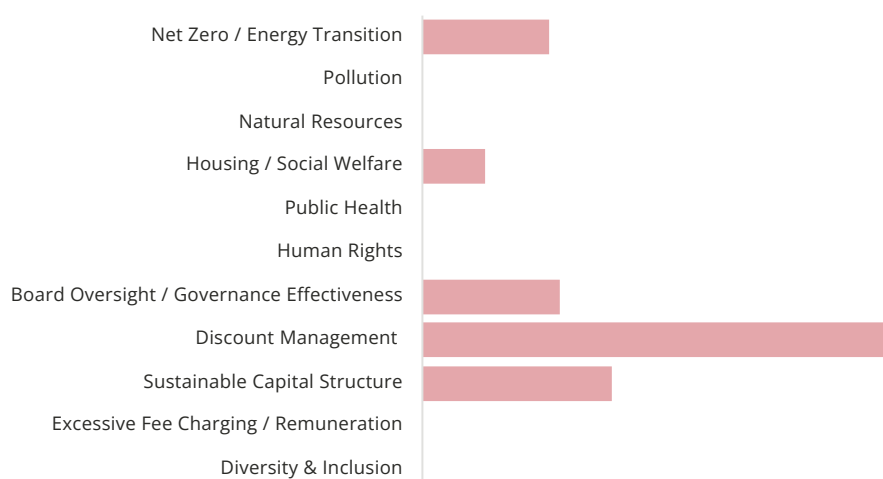
ESG Interactions Summary



ESG Issues Discussed



ESG Areas Raised (Detail)





Some examples of active engagements from the last half year include

Company	Category	Summary
PRS REIT PLC	Governance	PRS REIT plc is a quoted real estate investment trust focused on high-quality new build family homes for the private rental market. We invested in the company since its IPO in 2017 and believe it has played an important social role in increasing the supply of properties for the rental market. However we had concerns around certain governance arrangements of the company. In August 2024, alongside other shareholders, we requisitioned a general meeting to change certain directors and wrote an open letter to shareholders laying out our concerns. The board subsequently addressed a number of those concerns including appointing new directors and we withdrew the requisition. The subsequent performance of the company has been exceptional.
Foresight Solar Fund PLC	Governance / Environmental	Foresight Solar Fund plc invests into solar power plants in the UK, Spain and Australia. It has played an important role in financing the energy transition. However due to relatively poor governance practices its shareprice has fallen to a large discount to NAV in recent years, which means it cannot fund any further projects. Ahead of a continuation vote we engaged extensively with the board and fellow shareholders to improve governance standards. In particular we requested sale of non core assets, reduced fee arrangements and improved capital allocation in order to support the company to continue. The board engaged constructively with us ultimately we supported the company based on improved announced policies.
Residential Secured Income REIT PLC	Social / Governance	Residential Secured Income REIT plc is a real estate investment trust that raised money to finance regulated tenancy retirement apartments, homeless accommodation and share ownership residential properties. It plays an important role in the provision of social and subsidised housing. Through a combination of change of market circumstances and excessive leverage the vehicle had become unsustainable. After extensive engagement with the board we concluded these assets could be more effectively managed by alternative parties. The company went into managed wind down in October 2024 with the assets passing to landlords better able to service their tenants and capital being returned to investors.
Blackrock Energy and Resources Income Trust PLC	Governance	Blackrock Energy and Resources Income Trust plc is a conventional investment trust that invests into renewable and conventional energy companies as well as mining companies. We have significant concerns as to the sustainability of the company given its poor liquidity and large discount which is exacerbated by the small scale of the company. We have engaged with the board including attending the AGM and clearly representing a number of routes forward address these issues. This engagement is ongoing.

Collaboration





There are two main forms of collaboration that CGAM undertakes. Direct collaboration is a targeted form of intra-shareholder engagement initiated by us (or other shareholders) after identifying specific issues at an investee company. It is a highly effective way of engaging around non-systemic issues we identify in our portfolios.

A secondary form of collaboration, more suited to systemic issues, are indirect collaborative engagements intermediated by third party institutions or industry bodies. In complex areas of systemic risk we recognise that the impact of individual engagement is likely to be limited, so it makes sense to pool our influence with larger investor groups. We acknowledge there are many areas we can benefit from the insights of larger and more experience collaborators in the field of systemic risk.

	No. of examples in half year
Direct collaborations	3
Indirect collaborations	0

CGAM has been increasing its support to and knowledge of a number of third-party networks and associations as a first step in increasing our indirect collaboration activities.

We are signatories to or members of:

Network / Association	Summary
	PRI is a United Nations supported international network of financial institutions working together to implement aspirational sustainability principles.
	The Independent Investment Management Initiative is a member led industry group that represents investment boutiques.



CGAM is committed to regular reporting to allow our stakeholders to access timely information and for reasons of transparency. Our RI reporting schedule includes the following publications:

Half year responsible investment reporting	By fund
Half year proxy voting record	By fund
Annual PRI reporting	Firmwide
Annual proxy voting record	Firmwide

Voting

The full half year proxy voting record for the Portfolio Fund is available at www.cgasset.com/governance-and-policies. The voting summary for Capital Gearing Portfolio Fund for the half year is:

Total meetings voted	10
Meetings with at least one vote against	3
Meetings with at least one vote against management recommendations (%)	30%
Total votes cast in half year	92

Co2 metrics

Under our climate change policy CGAM has committed to publishing quarterly emissions data for our firm and our portfolios.

CGAM Scope 1 and 2 emissions half year	5.27 tCO ₂ e
CGAM scope 1 and 2 emissions annualised	21.10 tCO ₂ e
Capital Gearing Trust emissions per \$ M invested – TCFD methodology	59 tCO ₂ e / \$M
Absolute Return Fund emissions per \$ M invested – PCAF methodology	95 tCO ₂ e / \$M

CGAM co-owns of a range of renewable energy projects across the UK and Europe. The power output from these renewable projects, pro-rated for our investment, is many multiples of the power consumed by the company.



Portfolio carbon emissions

We have published two figures for the portfolio carbon emissions attributable to the Portfolio Fund. The aim of this is to communicate, on a best endeavours basis, a set of figures which are representative of the emissions attributable to all securities held by the portfolio.

The first is calculated using the Task Force on Climate-related Financial Disclosures (TCFD) methodology³. The TCFD methodology calculates a carbon footprint based on the reported emissions of eligible securities within the portfolio. Eligible securities are those which have a corporate issuer: equities and corporate bonds. This methodology is used widely in the asset management industry, but has two material shortcomings in respect of this fund. The first is that government bonds, which represent more than half of the fund's asset allocation, are not eligible securities and so are not included in the calculation. The second is that the fund's risk assets allocation is largely in UK investment trusts, where disclosure of carbon emissions is still in its nascent stages. As a consequence, the TCFD carbon footprint figure for this fund reflects the disclosed emissions of a relatively small proportion of its overall holdings.

We have published a second figure which attempts to cover the carbon emissions from all the fund's investments – equities, corporate bonds, and government bonds – using a blended methodology. To capture the emissions attributable to government bonds held by the fund, we have used the Partnership for Carbon Accounting Financials (PCAF) methodology⁴. This methodology considers the absolute emissions from the relevant country, and attributes a share to the fund's holdings by taking the US dollar value of the fund's holding in the government bond as a share of the US dollar value of the country's Purchasing Power Parity (PPP)-adjusted GDP. We then created a blended figure which apportions the PCAF attributable emissions to the share of the fund's asset allocation which is held in government bonds, and apportions the TCFD emissions figure to the remaining share of the fund's asset allocation. This figure is the higher of the two, and while it risks double counting emissions across the corporate and government issuer for a particular country, we believe it provides a more complete assessment of the emissions attributable to the portfolio.

Emissions per \$ M invested (TCFD methodology)	59 tCO ₂ / \$ M invested
Emissions per \$ M invested (PCAF methodology – government bonds only)	122 tCO ₂ / \$ M invested
Share of portfolio in government bonds	57%
Emissions per \$ M invested (blended methodology)	95 tCO ₂ / \$ M invested

³ *Implementing the Recommendations of the Task Force on Climate-related Financial Disclosures (2021). See 2021-TCFD-Implementing_Guidance.pdf.*

⁴ *The Global GHG Accounting and Reporting Standard for the Financial Industry. See <https://carbonaccountingfinancials.com/files/downloads/PCAF-Global-GHG-Standard.pdf>, Part A – Financed Emissions 2nd Edition (2022).*

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