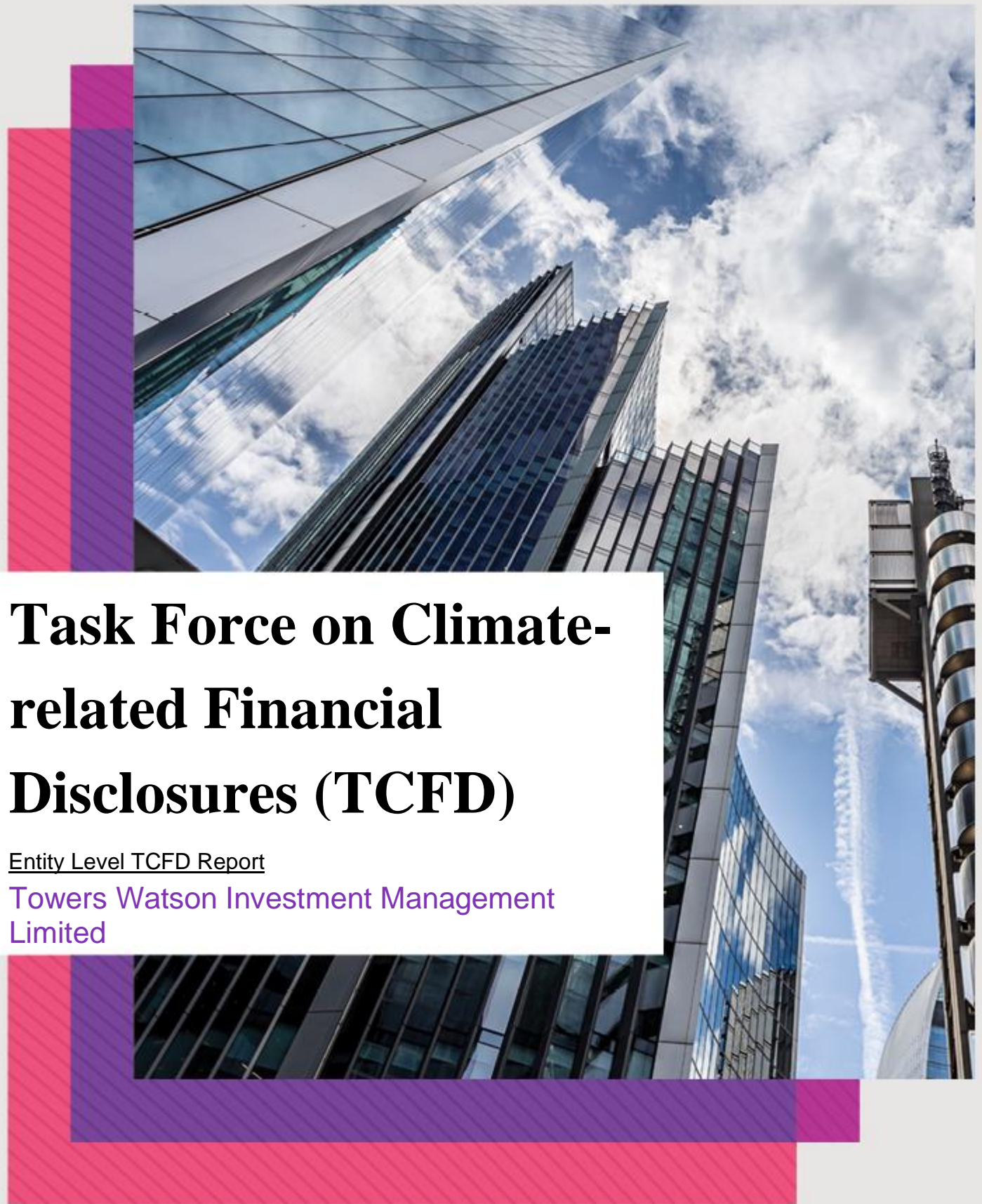




Disclaimer

Effective as of 10 October 2024, all references to 'Alliance Trust PLC' in this report shall now refer to the recently formed 'Alliance Witan PLC', reflecting the combination between Alliance Trust PLC and Witan Investment Trust PLC as of that date. Notwithstanding this change, any prior references to 'Alliance Trust PLC' in this report and the context within which it has been referenced remain true and accurate as at the date on which the report was issued.



Task Force on Climate-related Financial Disclosures (TCFD)

Entity Level TCFD Report

Towers Watson Investment Management Limited

Towers Watson Investment Management
Limited

Task Force on Climate- Related Financial Disclosures (TCFD)

2023 Entity Level TCFD Report

[wtwco.com](https://www.wtwco.com)

Table of Contents

- Section 1 : Introduction1**
 - 1.1 *Structure of the report*2
- Section 2 : Governance5**
 - 2.1 *TWIM Board Oversight of climate-related risks and opportunities*.....5
 - 2.2 *Management’s role in assessing and managing climate-related risks and opportunities approach*.....6
- Section 3 : Strategy.....8**
 - 3.1 *Our own emissions*.....8
 - 3.2 *Risk and opportunities*.....9
 - 3.2.1 *Risks*10
 - 3.2.1.2. *Opportunities*13
 - 3.3 *Investment management strategy and stewardship*15
 - 3.3.1 *Stewardship*.....17
 - 3.3.2 *Engagement*17
 - 3.3.3 *Voting*.....17
 - 3.3.4 *Data*17
- Section 4 : Risk Management19**
 - 4.1 *Risk management within our operations*19
 - 4.2 *How climate-related risks are integrated*.....22
 - 4.2.1 *Asset selection*22
 - 4.2.2 *Manager research*.....22
 - 4.2.3 *Portfolio management*.....22
 - 4.2.4 *Stewardship*.....22
 - 4.2.5 *Monitoring and reporting*23
- Section 5 : Metrics and targets.....24**
 - 5.1 *Metric calculation methodology and data sources*.....25
 - 5.1.1 *Data limitations*26
- Section 6 : Scenario analysis27**
- Section 7 : Statement of compliance32**
- Section 8 : Disclaimers33**
- Section 9 : Glossary.....36**



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Section 1 : Introduction

Willis Towers Watson Public Limited Company and its subsidiaries (“WTW”), including Towers Watson Investment Management Limited¹ (‘TWIM’ or the ‘Company’), focuses on sustainability matters as part of its internal operations including environmental, social and governance (‘ESG’) programs. It is also an area where we support our clients through ESG services and solutions to further our purpose to ‘transform tomorrows’. References to “we”, “our” or “us” are to TWIM.

TWIM is aligned to those internal programs and operations and is also able to access the full suite of services and solutions for its clients.

This report is published by TWIM in compliance with the Entity Level disclosure requirements set out in Chapter 2 of the Financial Conduct Authority’s Environmental, Social and Governance Sourcebook (the ‘ESG Sourcebook’) and consistent with the recommendations of Task Force on Climate-Related Disclosures (‘TCFD’) for the reporting period 1 January 2023 to 31 December 2023. All the data in this report is provided as of 31 December 2023. This is TWIM’s first TCFD Report.

This report should be read together with the [Alliance Trust PLC 2023 Product Level TCFD Report](#) and the wider [WTW 2023 Task Force on Climate-related Financial Disclosure Statement](#). This document is not incorporated by reference into this report. This TCFD report is focused on the “Company” however certain initiatives in this area are WTW-led and the Company contributes to the group initiatives as appropriate.

TWIM is authorised by the FCA as a UK Alternative Investment Fund Manager (‘AIFM’) and provides investment management services to selected clients for which it receives investment management fees. TWIM also acts as the AIFM to Alliance Trust PLC (‘AT’), a publicly traded investment company, with investment trust status, listed on the London Stock Exchange that trades as ATST². TWIM provides investment management services for several funds across a range of asset classes including credit, secure income and multi-asset strategies. In addition, TWIM has a distribution agreement with another WTW member, Towers Watson Limited³ (‘TWL’) for the distribution of Irish-domiciled WTW funds. While both TWIM and TWL are part of WTW, and work closely together, they are separate legal entities with their own Boards, management and governance structures.

In order to be diligent long-term stewards of our clients’ capital, across our portfolio management services, climate risks and opportunities are managed. These activities are captured in the details of this report.

This 2023 Towers Watson Investment Management Ltd Entity Level TCFD Report, although broadly aligned with the wider WTW approach regarding climate risks and opportunities, sets out the climate-related financial disclosures regarding the specific assets managed by TWIM as well as in relation to TWIM’s own operations.

More information on WTW’s sustainability approach is available on its [website](#), along with other WTW ESG related reports.

¹ Company number: **05534464**. Registered office address: **Watson House, London Road, Reigate, Surrey, RH2 9PQ**.

² ISIN GB00B11V7W98, more information on the Company can be found on its [website](#). Company number: **SC001731**. Registered office address: **River Court, 5 West Victoria Dock Road, Dundee, Scotland, DD1 3JT**.

³ Company number: **05379716**. Registered office address: **Watson House, London Road, Reigate, Surrey, RH2 9PQ**.

This 2023 Entity Level TCFD report includes disclosures as required by the FCA's ESG Sourcebook where it is fair, clear and not misleading for us to do so. Climate reporting in the asset management industry is still in its infancy, and there are significant data challenges and methodological challenges associated with climate reporting.

1.1 Structure of the report

The TCFD developed four recommendations on climate-related financial disclosures that are applicable to organisations across sectors and jurisdictions. In line with these recommendations, this report is structured in four sections (see **Table 1** below):

Table 1 – Report Structure

Section / Recommendation	Recommended disclosure	Page
Governance <i>Discloses TWIM's governance around climate-related risks and opportunities</i>	a) Description on the Board's oversight of climate-related risks and opportunities	5
	b) Description on management's role in assessing and managing climate-related risks and opportunities	6
Strategy <i>Discloses the actual and potential impacts of climate-related risks and opportunities on TWIM's businesses, strategy, and financial planning</i>	a) Description on the climate-related risks and opportunities the organisation has identified over the short, medium, and long term	9
	b) Description on the impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning	9
	c) Supplemental guidance for asset managers: How climate-related risks and opportunities are factored into relevant products or investment strategies; how each product or investment strategy might be affected by the transition to a low-carbon economy	10
	d) Description on the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario	27

Section / Recommendation	Recommended disclosure	Page
<p>Risk management</p> <p><i>Discloses how TWIM identifies, assesses, and manages climate-related risks</i></p>	a) Description on the organisation's processes for identifying and assessing climate-related risks	19
	b) Supplemental guidance for asset managers: Description of our engagement activity with investee companies to encourage better disclosure and practices related to climate-related risks in order to improve data availability and asset managers' ability to assess climate-related risks. Description on how material climate-related risks are identified and assessed for each product or investment strategy	20
	c) Description on the organisation's processes for managing climate-related risks	20
	d) Supplemental guidance for asset managers: Description on how we manage material climate-related risks for each product or investment strategy	21
	e) Description on how processes for identifying, assessing, and managing climate-related risks are integrated into our overall risk management	21
<p>Metrics and targets</p> <p><i>Discloses the metrics and targets used by TWIM to assess and manage relevant climate-related risks and opportunities</i></p>	a) Disclosure of the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process	24
	b) Supplemental guidance for asset managers: Description of metrics used to assess climate-related risks and opportunities in each product or investment strategy, including, where relevant, how these metrics have changed over time	24

Section / Recommendation	Recommended disclosure	Page
	c) Disclosure of Scope 1, Scope 2, and Scope 3 greenhouse gas (GHG) emissions, and the related risks	24
	d) Supplemental guidance for asset managers: Disclosure of GHG emissions for assets under management and the weighted average carbon intensity (WACI) for each product or investment strategy. These emissions have been calculated in line with the Global GHG Accounting and Reporting Standard for the Financial Industry developed by the Partnership for Carbon Accounting Financials (PCAF Standard)	25
	e) Description of the targets used to manage climate-related risks and opportunities and performance against targets	25

Section 2 : Governance

This section of the report discloses TWIM's governance around climate-related risks and opportunities.

2.1 TWIM Board Oversight of climate-related risks and opportunities.

Given WTW's responsibility to its shareholders, TWIM, as a subsidiary of WTW, via TWIM's board of directors (the 'Board') sets its strategic priorities and monitoring investment performance against the stated objectives. Until 30 June 2023, the Board consisted¹ of 4 directors led by the Head of Investments Europe. The Board is responsible for oversight of risks, including climate risks within TWIM, delegating certain²('RPC') as detailed below. The Board meets at least on a quarterly basis; investment and risk management are standing agenda items, including updates from RPC. TWIM is subject to oversight by, and leverages and benefits from, the wider governance structure of WTW. The operations and business activities of TWIM are also overseen and governed by the WTW Investments Global Leadership Team ('GLT').

The Board sets TWIM's strategic direction and risk appetite which is cascaded to its committees (see [Figure 1 – TWIM's Committees' Structure](#)) and oversees the company's senior management who are responsible for day-to-day operations and management of business matters, including climate-related matters.

With respect to Board oversight of ESG matters in general, the Board takes an approach that the most appropriate committee should maintain oversight over a particular issue rather than concentrating all initiatives into any one committee. The Board has 3 committees, see below a description of these committees (also, see below [Figure 1](#)):

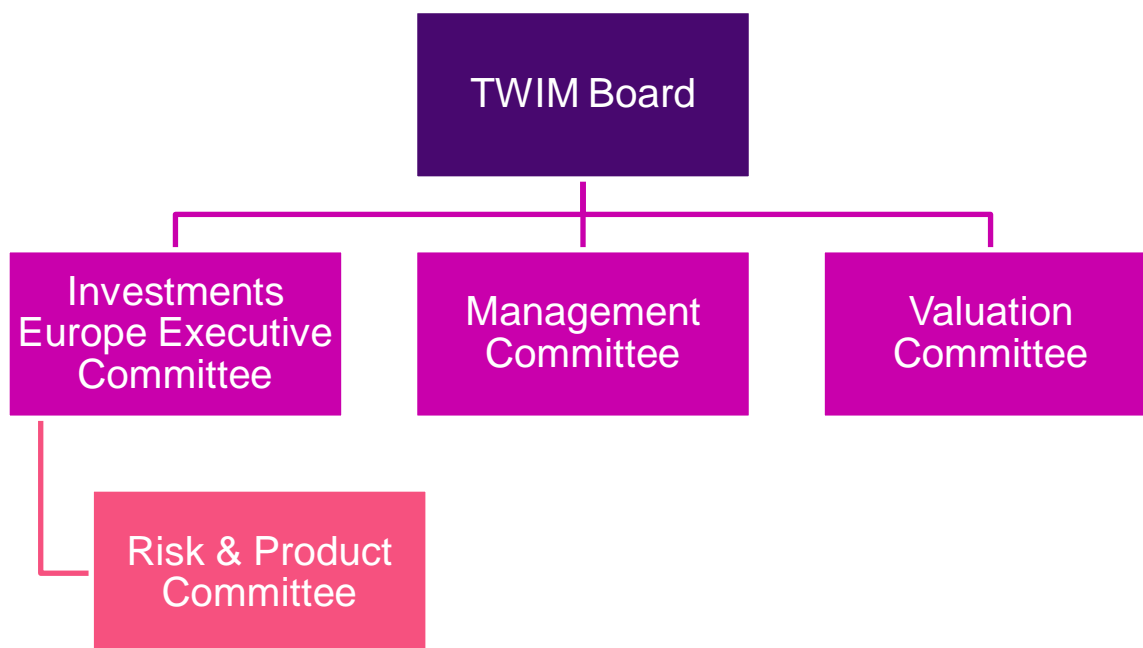
- The Management Committee is the delegated authority from the Board to oversee TWIM's business and support the Chief Executive Officer ('CEO') (who is also the Head of Europe for the Investments Division) in the day-to-day management.
- The Valuation Committee is empowered by the Board to govern the process by which the Net Asset Value ('NAV') per unit/share of WTW's funds is calculated, published, and applied to subscriptions and redemptions.
- The Investments Europe, Middle East, Africa ('EMEA') Executive Committee is responsible for the oversight of the Investments Division with delegated authority from the Board.

The Committees report to the Board on a regular basis.

The Board recognises the importance of climate risk related training both at Board level and for all WTW employees involved in TWIM related activities. Senior management and investment professionals complete training as part of WTW's wider training and development programmes. This includes specific training on climate risks and opportunities, as well as Net Zero commitments, regulatory developments, and topics such as [greenwashing](#).

¹ The Chief Operations Officer ('COO') resigned on this date.

² The RPC is a subcommittee of the European, Middle East, Africa ('EMEA') Investments Executive Committee and the Investments Global Leadership Team ('GLT') and has multiple reporting lines.

Figure 1 – TWIM’s Committees’ Structure

2.2 Management’s role in assessing and managing climate-related risks and opportunities approach

The operations and business activities of TWIM are overseen and governed by the WTW Investments Global Leadership Team (‘GLT’). The WTW Investments GLT comprises 10 senior leaders including the Heads of three geographies (Europe and UK, International and North America).

The WTW Investments GLT Sustainability sub-committee, which also reports into the WTW Investments GLT, is comprised of senior members, including the Global Chief Investments Officer (‘CIO’), Chief Operations Officer (‘COO’), Head of Sustainable Investing (‘SI’), Global Head of Strategic Projects and Global Head of Sustainability Solutions. This sub-committee sets business-level objectives to achieve our sustainability strategy, including climate-change related strategy and objectives and oversees the implementation, governance and resourcing to achieve those objectives.

Our Sustainable Investments Standards Committee (‘SISC’) reports into the Sustainability Regulations and Monitoring Committee (‘SRMC’), who consider, assess the impact, and allocate the necessary resources to all current and future regulations pertaining to sustainability. Membership of the SISC includes employees from various teams across sustainability within WTW, including, but not limited to, the Head of SI. The SISC is responsible for providing guidance on the processes within the WTW Investments Content team so that they are able to meet all SI content related requirements. It owns the key SI policies as they relate to investment content and in particular the processes required to meet our portfolio Net Zero goals with respect to assets managed on behalf of our fiduciary investment management clients.

The governance of our SI processes (of which climate change is a key part) is one of the priorities across our business and it is constantly being enhanced to respond to fast changing regulation and best practice.

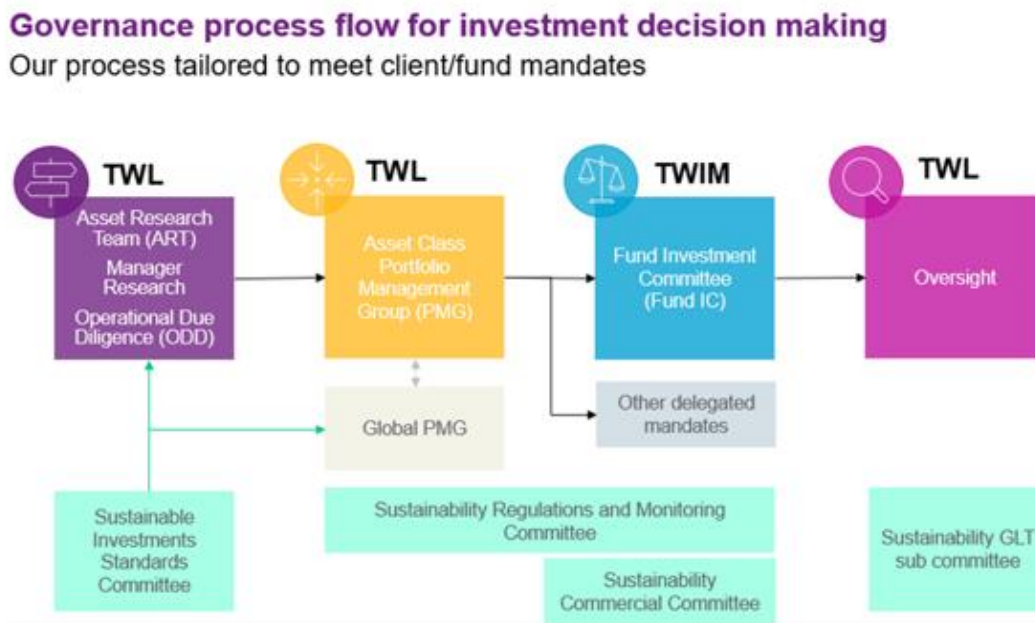
The Portfolio Management Group ('PMG') determines our overall investment views for managing portfolios. PMG comprises a number of portfolio managers, assistant portfolio managers and analysts. In order to fulfil its role, PMG also draws on the specialist investment knowledge available within WTW, including Portfolio Management, Manager Research, Asset Research Team, the Thinking Ahead Institute, Operational Due Diligence, sustainability expertise and other specialist teams. (Figure 2). The PMG adheres to the Sustainable Investing ('SI') Policy.

The Investment Committee ('IC') of each TWIM fund is then responsible for day-to-day management and monitoring of fund portfolios including controls and risk levels, including climate-change related risk. The IC is able to evaluate the Net Zero alignment of each strategy/fund and how this is evolving over time. The IC for each fund adheres to the SI Policy. The tools the ICs use incorporate internal and external ESG data sources and stewardship level data from the stewardship service provider (see further details in [Stewardship section](#) below) and managers.

Sustainability specialists are also invited to IC meetings where climate-related risk is specifically considered, which occur on an ad-hoc basis. In addition, the CIO of Delegated Investment services reviews the performance and risk of the TWIM funds, including overseeing the sustainability characteristics, through the receipt of the monthly Fund IC meeting reports and reviews of quarterly risk and portfolio activity reports. These are then discussed in quarterly meetings with the Board.

In addition to the work undertaken by the IC, the TWIM Risk Team reviews the portfolio's exposure to climate-change risks and other ESG factors on a regular basis and challenge the IC if concerns arise (see the [Risk Management section](#) of this to see how risks are rated/assessed).

Figure 2 – Governance process flow



Section 3 : Strategy

This section of the report discloses the actual and potential impacts of climate-related risks and opportunities on TWIM's businesses, strategy, and financial planning in respect of its products and services where such information is material.

We recognise that climate change presents a broad spectrum of risk and opportunity, for our business, impacting both, our direct operations and those of the portfolios we manage on behalf of our clients. An asset class breakdown of the total assets under management can be found below. (Figure 3)

Figure 3 – Total Assets Under Management By Asset Class (% AUM)

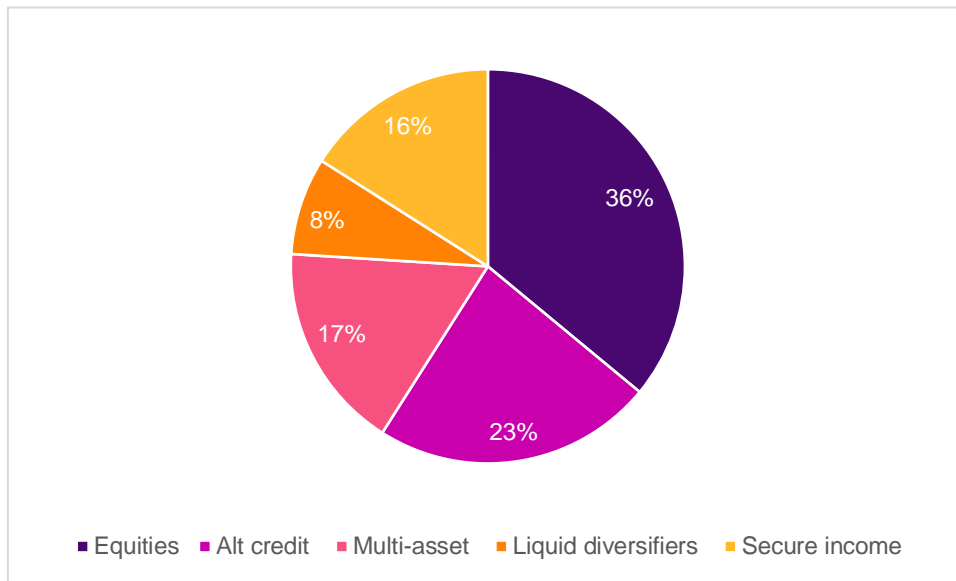


Figure 3 - above data is as at 31 December 2023.

3.1 Our own emissions

WTW recognises the importance of its environmental responsibilities and focus on improving and tracking emissions globally. WTW has clear targets and specific actions to reduce its own carbon footprint including reducing waste, energy use & business travel from its operations.

Target: WTW is committed to delivering Net Zero greenhouse gas emissions by 2050 at the latest, with at least a 50% reduction by 2030 across its business operations. This includes a commitment to achieving 100% renewable energy supplies across WTW's real estate portfolio by 2050.

WTW manages its contribution to global emissions across its own operations, its suppliers and its value chain through:

- Improving energy efficiency in its operations
- Reducing its need for business travel by using virtual meeting technologies and more flexible workstyles
- Promoting recycling in WTW offices

- Minimising the waste sent to landfill
- Purchasing environmentally responsible supplies
- Encouraging all colleagues to adopt environmentally responsible habits at work and in their communities

Separately, in the fully discretionary delegated investment portfolios we manage for clients, we set a goal of Net Zero greenhouse gas emissions by 2050 at the latest, with at least a 50% reduction by 2030, consistent with the goals of the Paris Agreement.

3.2 Risk and opportunities

This section highlights the material climate-related risks and opportunities for our own operations identified. Due to the limited availability of public data and assumptions involved, we have not quantified the financial impact of these risks and opportunities at this time. Instead, a qualitative impact assessment using the adapted Enterprise Risk Management ('ERM') scales has been performed. Quantification of the financial impact (e.g. costs and revenues) on all climate-related risks and opportunities will be further developed in future reporting.

Certain non-financial data and information which is subject to measurement uncertainties resulting from limitations inherent in the nature and the methods used for determining such data is set out below.

Our underlying assessments vary depending on the timeframes and risk profiles of our clients and the business line. Recognising the longer time horizon of many climate-related risks, the following timescales are applied:

Table 2 – Risk timeframes

<i>Scale</i>	<i>Criteria</i>
<i>Short term</i>	0-3 years (based on our clients' needs for quick, accurate and timely deliverables based on the latest technology and sector developments).
<i>Medium term</i>	3-7 years (covers potential risks and opportunities that are identified now but may not be experienced until later. This is in line with WTW's environmental commitment to at least a 50% reduction in greenhouse gas emissions).
<i>Long term</i>	7-20 years (aligned to our Net Zero target and encompassing long term policy and industry trends).

3.2.1 Risks

This section outlines how we identify and manage climate-related risks and opportunities pertaining to our own operations, across various timeframes and the steps we are taking to mitigate them. Given the prioritisation of climate change as a critical and systemic issue, this is a key focus of our portfolio construction process – understanding our risk exposures and reducing them through time, as well as identifying and investing effectively in the opportunities. This occurs both through top-down identification and analysis of climate-impacted sectors for investment, as well as the bottom-up contribution of each manager or investment.

Climate-related risks are assessed and prioritised as part of our overall risk management framework, in a similar way to all other risks on WTW's risk register. Risks are assessed on two different scales:

- 1) **A Non-Financial Impact Rating Scale** which ranks the risk over 4 levels (low, medium, high or critical) based on the actual or potential damage it could cause to reputational, regulation, legal, client or service delivery levels.
- 2) **The Financial Impact Rating Scale** is also scored based on the potential impact on revenues and assigned a "level". These risks are combined to generate an overall impact rating of 1 (low) to 4 (critical).

The likelihood of the risk is also assessed. We assess likelihood as the likelihood of a potential risk occurring within the next 12 months and based on this percentage, a rating of "unlikely" to "highly likely" is assigned.

These two factors are then combined to generate a 4x4 risk assessment matrix used to determine the overall risk assessment rating for TWIM.

We have sub-divided climate-related risks into transition risks (i.e., risks associated with the transition to a low-carbon economy) and physical risks (i.e., risks related to the physical impacts of climate change). Our overall risk rating for each of the risks has been integrated and scored within our ERM framework and is shown below (including [Table 3](#)), along with a more detailed description of the specific types of risks found:

1. **Reputation (Transition Risk/Regulatory/short term)** – The regulatory landscape is rapidly evolving and increasing in complexity with different regimes across geographies. In addition, our clients' expectations are also developing to match this. There is a risk of reputational damage which may result in additional expenditure or litigation costs if we do not remain at the forefront of this change and continue to address this challenge and that of quality data to make our investment decisions.
2. **Policy and legal (Transition/Regulatory & Market/short & medium term)** – Changing government regulations may need asset managers to invest in new products and introduce costly new measures to comply. In the extreme, this could require us to dis-invest certain assets to meet new regulatory guidelines. Regulatory change could lead to stranded assets or asset impairments in our investment portfolios. In addition, we may need to put in place investment restrictions and limitations on carbon intensive companies in our portfolio. We also consider restrictions on companies not taking appropriate action towards Net Zero, or holdings where countries are exposed to the transition to a low carbon economy (medium- to long-term).

- 3. **Market & Economic (Transition/Market/short & medium term)** - The related issues may have an adverse effect on the valuation of our investment assets through asset impairment, the viability of business models or credit ratings.
- 4. **Operational (Transition/Market/short & medium term)** – Risk in being able to recruit & retain the right personnel with appropriate skills & experience. We will also need to invest in new technology and data sources to enable us to maintain robust processes which could increase operational costs. We need to continue to reduce our operational emissions in line with the parent company Net Zero target (WTW) or our own Net Zero target.
- 5. **Extreme weather-related events (Physical/ Acute/short & medium term)** - There is a risk of disruption both at an operational level and with investments as result of extreme weather conditions. This could reduce revenues and increase costs.

WTW has 4 offices in England and Scotland. A physical risk assessment of risk exposure of these sites was completed using Munich Re’s Location Risk Intelligence tool.

All sites were analysed using geospatial modelling software to establish current physical risk along with how these vary across different time horizons under various scenarios. One site was identified as ‘low’ risk, two were ‘medium’ risk and the other ‘extreme’ risk, however these were all due to singular potential hazards rather than numerous risks at each site.

Two sites in England were identified, including the London office, as having heightened present risk to extratropical storms and tornados; however, the exposure to this risk is not projected to increase under any of the scenarios or across any of the studied time horizons and so is not considered to be climate-related. These sites were also identified as being in areas with annual water stress, however given the nature of operations, this is not considered a risk.

One site had an ‘extreme’ exposure to flooding due to its proximity to the nearby river.

Key for **Table 3** and **Table 4** below:



The key above sets out our overall risk rating scale based on the likelihood of the specific risk occurring within the next twelve months and the subsequent financial and non-financial impacts.

Table 3 – Qualitative risk assessment

	Risks				
	Reputational	Regulation	Market & Economic	Operational	Flood
<i>Type</i>	Transition (Regulatory)	Transition (Regulatory & Market)	Transition (Market)	Transition (Market)	Physical (Acute)
<i>Area</i>	Own Operations	Upstream and Downstream	Upstream	Own Operations	Own Operations
<i>Primary potential financial impact</i>	Increased expenditure or litigation costs	Increased costs of compliance from supplier or marketing, or loss of potential income from having to divest from assets	Lower valuation of our investment assets	Increased costs of training and compliance and lower productivity in the interim if technology or working practices change	Higher costs / disruption of operations
<i>Time horizon</i>	Short term	Short & Medium term	Short & Medium term	Short & Medium term	Short & Medium term
<i>Mitigation</i>	Our parent company WTW has set a Net Zero target for 2050 and we have committed to meet this target through our operations and investments. We continue to develop our climate	We regularly monitor regulatory frameworks and climate developments and consider how this may impact any litigation risks. We also update our metrics & data to ensure we have a high	We regularly assess climate risks by asset class/sector and geography, with updated data and enhancing modelling capabilities and tools. We pursue a policy of engagement	We have a robust business continuity and operational resilience programme to cover all staff, locations and processes. Continue to implement energy efficiency and carbon reduction	We have a robust business continuity and operational resilience programme to cover all staff, locations and processes, with insurance policies in place. Established working from home

Risks

	Reputational	Regulation	Market & Economic	Operational	Flood
	disclosures in line with regulatory requirements and best practice. We work closely with all our stakeholders, peers and climate bodies to remain current with climate regulation. Continued development of the range of ESG and sustainable customer solutions. Regular assessment of investment strategies and to ensure they meet customer demand.	quality of information.	and stewardship with all stakeholders and maintain an up-to-date exclusions policy.	measures and engage with key suppliers to enable alignment with our emission targets.	practices for employees alongside TWIM only leasing offices minimised any potential physical risks that may affect our operations, as does the location of the “extreme” exposure site, in a leased office not located on the ground floor.
<i>Overall Risk Rating</i> (Low / Medium / High / Critical)	Medium	Medium	High	Medium	Low

2.1.1.2. Opportunities

This section outlines how we identify and manage climate-related opportunities pertaining to our own operations, across various timeframes. The overall rating for each of the opportunities has been

integrated and scored within our ERM framework and is shown in the table below, with a more detailed description of the specific types of opportunities found further below. (Table 4)

1. **Products and services (strategic)** - In order to meet client requirements on ESG & Net Zero, there may be a growing demand from clients for ESG investing. This could open opportunities for new products and services for example by creating Net Zero aligned products and funds, and also providing data and analytical tools. Our EU Sustainable Finance Disclosure Regulation ('SFDR') Article 8 Funds have climate-related objectives and WTW has also helped create the Climate Transition Index (CTI) – a family of indices – in partnership with STOXX, an index provider.
2. **Enhance investment returns** - Through investing in companies that benefit from the energy transition and/or those that have high levels of climate resilience and have good environmental disclosure.
3. **Invest in data, technology & infrastructure** - That enables us to achieve our operational emission reduction targets (like EV charging points, renewable energy sources, low carbon properties/leases). WTW also supports sustainable sourcing with suppliers and our processes for evaluating our key suppliers includes sustainability criteria and compliance with environmental and climate laws and regulations. This supports WTW's goal to reduce Scope 3 emissions in line with our 2030 and 2050 goals. As more companies within WTW's supply chain set targets with SBTi and reduce emissions, WTW anticipates a reduction of Scope 3 emissions from purchased goods and services.

We ensure we have up to date data and technology to analyse our emissions and our portfolio emissions.

Table 4 – Qualitative opportunities assessment

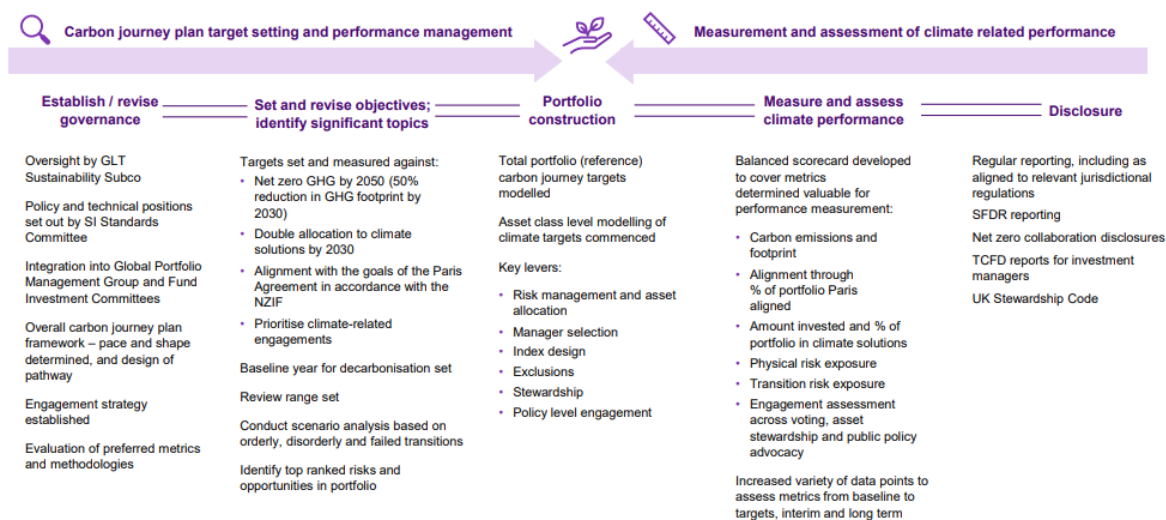
Products and services (strategic)	Enhanced investments returns	Investment in data, technology and infrastructure
Growing demand from clients for ESG investing	Investing in companies that benefit from the energy transition and/or those that have high levels of climate resilience and have good environmental disclosure, may lead to outperformance over the medium term	Enabling the monitoring and achievement of emission reductions
Opportunity for new products and services		The processes for evaluating the key suppliers includes sustainability criteria and compliance with environmental

Products and services (strategic)	Enhanced investments returns	Investment in data, technology and infrastructure
		and climate laws and regulations
EU SFDR Article 8 Funds have climate-related objectives and WTW has also helped create the Climate Transition Index (CTI) – a family of indices – in partnership with STOXX, an index provider		As more companies within WTW’s supply chain set targets with SBTi and reduce emissions, WTW anticipates a reduction of Scope 3 emissions from purchased goods and services, helping WTW to achieve its own Net Zero targets
Medium	Medium	Medium

3.3 Investment management strategy and stewardship

Addressing climate risk forms an integral part of our business strategy in investment management. We work with our clients, investment professionals and operational teams to embed a better understanding of the impact of climate-related risks and opportunities within our business and to enhance our organisation’s resilience to climate-related risks. We look to integrate climate throughout our investment processes, including portfolio construction and manager selection to monitoring & reporting, with additional focus on climate-related research, resources, and data.

Figure 4 – Sustainable investing process



Across the TWIM fund range, we have certain funds with climate change related characteristics as pertains to their SFDR Article 8 classification. These funds make up 89.86% of TWIM's AUM and are:

1. Towers Watson Alternative Credit Master Fund
2. Towers Watson Core Diversified Master Fund
3. Towers Watson Euro Secure Income Master Fund
4. Towers Watson Global Equity Focus Fund
5. Towers Watson Partners Master Fund
6. Towers Watson Secure Income Fund

Details on the credentials that are used across the six funds can be found in the table below. (Table 5)

Table 5 – SFDR Article 8 Criteria

Fund credentials

<i>Good governance process</i>	<ul style="list-style-type: none"> • Sound management structures, and Staff remuneration – covered by an overall governance assessment (UNGC and OECD) • Employee relations – covered by assessing labour rights controversies • Tax Compliance - covered by assessing Taxes and Subsidies disputes
<i>Environmental characteristics</i>	Net Zero by 2050, half emissions by 2030
<i>Sustainability credentials</i>	<ol style="list-style-type: none"> 1. Achievement against the Fund's Carbon Journey Plan's "absolute emissions index" by monitoring the portfolio emissions / \$ invested in accordance with Institutional Investors Group on Climate Change ("IIGCC") Net Zero Investment Framework ("NZIF"); 2. Percentage of the Fund's portfolio that is Paris Agreement (1.5°C) aligned in accordance with the NZIF; 3. Percentage of the Fund's portfolio in climate solutions using the IIGCC framework; 4. The number of engagements with Sub-Investment Managers and investee companies on Net Zero/climate-related matters 5. Exclusions - Towers Watson Global Equity Focus Fund only

3.3.1 Stewardship

Effective stewardship is a critical aspect of our SI and sustainability risk management and is important to a well-functioning investment industry. We seek to exercise our stewardship responsibilities, either directly or via third parties, across relevant areas to mitigate risks, including sustainability risks, identified across our investment process through:

- Asset manager engagement
- Security-level engagement
- Voting
- Public policy and engaging wider industry groups.

We also engage with our clients, and with asset owners, regulators and other stakeholders to ensure that we manage climate-change related risks now and into the future.

Please refer to our latest [WTW UK Stewardship Code Report](#) for more details.

3.3.2 Engagement

Our main topic of engagement with external asset managers during 2023 was climate risk management. External asset managers have a responsibility to undertake engagement with underlying issuers on their plans to reduce emissions over time. We look to external asset managers to evidence and track, via quality reporting, underlying climate engagement with issuers.

To supplement corporate engagement carried out by individual asset managers, we partner with a stewardship service provider for many of our delegated solutions. Climate is a key pillar of the stewardship service provider's engagement plan. We track the progress made by this group in engaging the most material emitters in relation to climate. We have worked closely with this stewardship service provider for many years, input into their engagement planning and prioritisation, and currently our Head of SI chairs their Client Advisory Board.

3.3.3 Voting

We expect appointed managers to consider climate-related resolutions on a case-by-case basis given the context and nuance of each proposal and to give due care to the voting decision made. For example, in relation to the voting conducted in respect of Alliance Trust PLC, during 2023 approximately 54% of environmental themed shareholder resolutions (the majority of which were climate-related) votes were supported¹.

3.3.4 Data

An important aspect of this process is enhancing the quality of our proprietary climate analytical tools like our Climate Transition Value at Risk ('CTVaR') tool) and our climate metrics and data. We recognise that climate risk data still has gaps and challenges associated with it and we work closely with managers and third-party data providers to improve coverage and quality of the data and our associated analytical tools. As a result of this and our continued investment in a Climate Practice,

¹ Source: ISS, EOS at Federated Hermes, WTW, data as of 31st December 2023.

TWIM is well positioned to provide data and analytical tools to enable us to assess and monitor the impact of climate-related risks & opportunities of our investments as we construct and manage our investment portfolios.

These tools are embedded within our SI strategy which integrates ESG factors, and effective stewardship into our investment management activities. SI is embedded throughout our investment process, from setting a mission and belief framework, through risk management, portfolio construction and manager selection, to implementation and monitoring. An important aspect of our SI strategy is embedding climate considerations into our investment decisions to ensure alignment with our own Net Zero target.

Section 4 : Risk Management

4.1 Risk management within our operations

This section of the report discloses how TWIM identifies, assesses and manages climate-related risks.

As part of the management of business risks, climate change has been identified by the business as an emerging risk. TWIM's approach to managing climate-change related risks is embedded within its ERM framework and processes. As such, climate-change related risks are managed consistently with the other risks faced by TWIM.

The ERM process assesses climate-change risks to ensure they are managed within acceptable levels by implementing appropriate controls and limits.

Risk oversight is carried out by senior management regularly, including through relevant committees, and management actions are agreed to address identified control weaknesses, as appropriate.

For our portfolio management operations, we believe that the principles underlying SI form the cornerstone of a successful long-term investment strategy and that SI considerations can materially improve risk and/or return for our portfolios. This reflects, in our view, good risk management and supports a responsible investment industry.

We aim to embed SI throughout our investment process, from setting a mission and belief framework, portfolio construction and manager selection, to implementation, risk management and monitoring. We view SI as an integral input to the decisions we make, not a separate or disconnected consideration.

Within the broad remit of sustainable investing and notwithstanding other significant topics, we have identified climate-related risk as a critical and systemic priority, given the risk it presents to our clients' investments, the ongoing resilience of the savings space, and the planet as a whole.

Identifying climate-related risks are key factors in identifying investments, themes and asset classes we pursue, avoid, overweight or underweight in the portfolios. Determining these views is an exercise of ongoing collaboration across all our research teams and portfolio management teams.

Data, tools and technology (in our portfolio management process)

At present, our principal external provider of data to help assess climate-change risks is MSCI ESG Research LLC ('MSCI'). We supplement the extensive data we receive from MSCI, with our proprietary CTVaR data and in-house analytics for assessing physical risk data, [including the following]:

- **Climate Transition Index:** In 2021, we created the Climate Transition Index ('CTI') family of indices in partnership with STOXX, an index provider. It offers a systematic and transparent way for investors to manage the financial risk from the climate transition that investment portfolios are exposed to.
- **CTVaR:** Our proprietary CTVaR methodology quantifies climate transition risk by integrating forward-looking company assessments with traditional risk and return models. Using this methodology, we are able to determine the climate transition risk that investee companies face, helping identify risks and potential opportunities for investors.

- **Climate Quantified:** Our proprietary Climate Quantified physical and transition risk analytics enable us to get a much better understanding of the true exposure to climate-related risks in our portfolios.

These tools and data are combined within our overall portfolio construction tool which assesses all the lenses of portfolio quality that we consider allowing us to build portfolios that weigh these lenses according to our investment beliefs, market conditions and client contexts.

How we manage climate-related risks (in our portfolio management process)

In order to assist our portfolio construction and management processes, we draw on a number of portfolio tools. The majority of which have been developed and tailored in-house to best align with our approach to building portfolios and our investment beliefs. Examples of some of these tools are outlined below:

1. **Portfolio resilience scoring** – Aggregating security-level sustainability data to indicate the total exposure of a portfolio (or parts of a portfolio) to a wide range of sustainability risks and issues.
2. **Scenario analysis** – Stress-testing our portfolios, including for example on realistic global emissions pathways to assess portfolio quality in the face of various climate change scenarios.
3. **Exclusions** - There are instances when investee company activities and involvements meet our exclusion criteria in certain portfolios. Thermal coal and tar sands are examples of climate-related exclusions in place for some of our portfolios based on certain revenue thresholds.
4. **Manager selection** – An assessment of how well climate-related factors, as well as wider sustainability factor, are incorporated into an asset manager's investment process is a significant part of our manager research and selection process.
5. **Index design** – We actively assess the characteristics of market indices and make a deliberate choice of which to use – climate risk is one of the factors we use in this decision. We provide this assessment as advice to clients or as part of our discretionary investment process.

We currently use a variety of third-party and proprietary data sources as input to our proprietary tools (as listed above). At both a security and portfolio level, this allows us to challenge bottom-up security selection decisions with managers and apply top-down portfolio management, on absolute and relative bases. These sustainability-focused tools are combined within our overall portfolio construction tool which assesses all the lenses of portfolio quality that we consider allowing us to build portfolios that weigh these lenses according to our investment beliefs, market conditions and client contexts.

The assessment of sustainability risks is complex, often requires subjective judgements, and may be based on data which is difficult to obtain, incomplete or estimated. Sustainability risk data is a continuously improving space and there are still data gaps and challenges for certain companies, particularly within debt and outside of developed markets. We have identified areas where risk data is limited, and we are engaging with managers and third-party data providers to improve coverage and quality. We expect data coverage and quality to improve over time.

Example of risk management process: focused equity solution - the TWIM Global Equity Focus Fund, which has a similar investment strategy to that followed by Alliance Trust plc. The levers to manage climate risk differ by investment solution. In order to illustrate some specifics, below we set out the process in place in respect of a key focused equity solution we manage.

1. **Mandate design:** Managers are all given segregated mandates and the mandates are designed to focus on long-term (5-10+ year time horizon). With a long-term time horizon, managers are more focused on risk as the permanent loss of capital rather than short-term risk relative to a benchmark. As such, the long-term risks associated with climate and other ESG risks are inherently more embedded in the mandate.

Secondly, the fund complies with the WTW Exclusions Policy. From a climate perspective, we exclude investment in securities issued by companies that:

- derive more than 25% of revenues from thermal coal mining or sales to third parties;
 - derive more than 50% of revenues from thermal coal power generation; or
 - derive more than 25% of revenue from oil sands extraction
2. **Research/Integration:** TWIM integrates the assessment of sustainability risks, including climate risks, into investment management processes alongside other financial metrics. “Sustainability risk” means an environmental, social (including labour standards) or governance (‘ESG’) event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment. Also, it integrates the assessment of sustainability risks into investment management processes through conducting due diligence over current and potential managers and scoring each to assess capability in managing sustainability risks.

3. **Stewardship:**

Engagement

TWIM believes that engagement, with a view to making incremental improvements in management of sustainability risks, should reduce risk and potentially increase expected returns over the long-term.

As such, TWIM engages with the managers on sustainability risk and climate risk management. The managers will engage with the companies in which they invest. The managers typically meet with or write to investee company management teams to express their views and opinions on sustainability risks or to seek further clarity from the company on their approach in this regard. In addition, the stewardship services provider will engage with companies on sustainability issues in order to effect change and report on progress vs their engagement plans over time. Finally, TWIM and/or the manager is able to engage with the stewardship services provider on engagement priorities.

Proxy Voting

TWIM’s intention is for managers to vote on every eligible ballot for shares held by the Company. There can, on occasion, be technical or operational limitations which prevent voting on certain matters, but TWIM strives to eliminate them where possible. Additionally, the

managers may choose to not vote on eligible ballots if such voting restricts the ability to sell the shares to be voted for a period of time (a situation known as share blocking).

The managers have accountability for voting and do so with the aim of positively influencing their climate risk strategy and seeking to create attractive returns.

4.2 How climate-related risks are integrated

4.2.1 Asset selection

Sustainability risks and sustainability-related considerations are key factors in identifying investments, themes and asset classes we pursue, avoid, overweight or underweight in the portfolios. Determining these views is an exercise of ongoing collaboration across all our research teams and portfolio management teams.

4.2.2 Manager research

We have a formal process for integrating sustainability risks into our manager research decisions, which is tailored to be most relevant and appropriate for the asset class and strategy in question.

Our assessment of an asset manager's SI practices and implementation, in the context of individual strategies and products, feeds into our overall view of their ability to sustain a competitive advantage. Consequently, the overall rating we place on a strategy will reflect our view of the SI credentials and capabilities of the strategy under review.

In addition, part of our manager research process is based on assessing the culture of the asset manager. SI plays a significant part in this culture assessment, including with regards to inclusion and diversity principles.

4.2.3 Portfolio management

Our portfolio construction process focuses on maximising portfolio quality, as evaluated through a number of 'lenses', including sustainability. This helps us build robust, diversified portfolios to seek to achieve our funds' and clients' risk and return objectives, as well as help to ensure our portfolios are resilient to a range of sustainability-related risks.

Sustainability risks are incorporated into our portfolio management process through a number of avenues. An important part of our framework for doing this is to assess sustainability through two dimensions:

1. **Portfolio resilience** – exposure of the portfolio to sustainability risks.
2. **Manager SI integration** – the extent to which, and success with which, sustainability is incorporated into the decisions made by managers appointed to manage a portion of the portfolio.

4.2.4 Stewardship

We also partner with the stewardship service provider to undertake public policy engagement and engagement with wider industry groups. It works with policy makers and institutions around the world to better ensure policies and standards are aligned with the interests of investors and best meet the needs of end savers.

During 2023, our stewardship service provider:

- Engaged on over 3000 issues and objectives
- Achieved at least one engagement milestone for 51% of objectives
- Made most progress in engagements within climate change, human capital and human/labour rights

We also engage with our clients, and with asset owners in general to ensure that we manage sustainability risks now and into the future, with a close understanding of their beliefs and needs.

For further information please refer to [Stewardship, Engagement and Voting sections](#) above.

4.2.5 Monitoring and reporting

In respect of monitoring and reporting, we undertake a wide range of activities as part of our research, portfolio management, risk management and client services. Our monitoring and reporting of sustainability risks is consistent with the principles and activities outlined above. We look to monitor and report against sustainability risks that are financially material in the given investment context, and we also look to align our report with regulatory standards and recognised good practices.

Our monitoring and reporting draw on both internal research and external third-party data. We view our monitoring and reporting as an important tool to help with the effective oversight of a client's investments, aligned to their ultimate investment objectives. WTW has developed a 'Climate Dashboard', that displays a multidimensional set of climate data and metrics. The dashboard is used as a portfolio management monitoring tool and the metrics include carbon footprint, alignment, climate solutions, transition risks and physical risks.

Section 5 : Metrics and targets

This section of the report discloses the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material to TWIM. This is the first year of disclosure and the metrics have been selected in accordance with the FCA's ESG Sourcebook and the TCFD's supplemental guidance on metrics. We will look to evolve our disclosures as industry reporting standards converge and data quality improves.

TWIM uses climate-related metrics to monitor climate-related risks and opportunities, consistent with those used for WTW. Targets are described under [Section 3, Strategy](#).

To measure the impact of our operations on climate change, we measure metrics across decarbonisation, alignment and mobilising transition finance. These are monitored on a quarterly basis through executive-level performance reporting. We are actively working to improve coverage of climate metrics and associated methodologies.

In relation to our underlying investment management portfolios, we continue to increase coverage of our emissions data, and strive to move towards full coverage whilst acknowledging the industry wide challenges with this. Emissions for the investment portfolios TWIM manages for clients are not included in this report. Scope 3 Category 15: Investments and other Scope 3 Category emissions, to the extent relevant, are addressed as part of a separate effort, for consideration in future disclosures as industry reporting standards converge.

We have calculated a range of metrics that allows us to manage and measure climate risk on our business operations shown below.

Table 6 – TWIM's operational carbon emissions

Measure	Metric	Unit	Year: 2023
<i>TWIM's operational carbon profile</i>	Scope 1 and Scope 2 emissions	tCO ₂ e	15.96
	Scope 3 emissions*	tCO ₂ e	2.51
	Total emissions	tCO ₂ e	18.47
	Weighted Average Carbon Intensity ('WACI') (Scope 1 and Scope 2)	tCO ₂ e/£m revenue	0.26
<i>Underlying investment portfolios' metrics</i>			
<i>Transition risk</i>	Climate Transition Value at Risk ('CTVaR')	%	-2.36%

**Employee-Owned Cars: Emissions from business travel in employee-owned vehicles where the company is responsible for purchasing the fuel (mandatory).*

The reporting period of Table 6 is as at 31st December 2023. These metrics have been used as they are common business metrics for our industry sector. Data timeframe alignment is as close as is reasonably practical. For example, emissions data covers the calendar year reporting period, but revenue figures related to the WACI cover the financial year best aligned to the reporting period.

5.1 Metric calculation methodology and data sources

WTW has taken guidance from the UK Government Environmental Reporting Guidelines (March 2019), the GHG Reporting Protocol - Corporate Standard, and from the UK Government conversion factors for company reporting database from the Department for Business, Energy and Industrial Strategy (BEIS) for calculating carbon emissions. We consider this energy and emissions accounting has been completed in accordance with reasonable methodology. Utility data was obtained to measure Scope 1 and 2 emissions, and where unavailable, proxy data for floor area was used to estimate energy usage and emissions. The TWIM emissions data was based on the WTW Scope 1 and 2 emissions only - a proportional approach based on headcount was applied to allocate emissions. The TWIM emissions were proportionately allocated based on AUM in relation to TWL Investments Division

For ground transport (both Scope 1 and 3), data was obtained from expense claims and converted to fuel volume using global fuel price averages for 2023.

Weighted average carbon intensity ('WACI') is defined as the tonnes of CO₂e per million pounds revenue.

CTVaR quantifies climate transition risk exposure by integrating forward-looking company assessments with traditional risk and return models. CTVaR analyses the impact on projected company cashflows of moving from a 'business as usual' scenario – reflecting current policies – to a world where emissions pathways are fully aligned to the goals of the Paris Agreement. This is based on a granular understanding of the plausible/likely changes to policy, regulation, technologies, and consumer preferences that would occur in a transition to a low carbon world.

In relation to the investment portfolio metrics: Issuer-level climate and fundamental data is sourced from MSCI and applied to the investment portfolios. For unlisted or non-transparent strategies, strategy-level climate metrics provided by underlying managers are used in the first instance. In cases where underlying managers have not provided the requested climate metrics, proxy portfolios are developed using country/sector exposures sourced from a combination of Risk Metrics and underlying manager data. Sovereign debt strategies are excluded from the calculation of all metrics.

GHG footprint scope, calculation information and emissions factors:

Certain information used to calculate emissions is assumptions-based. WTW uses actual data when it is available and when WTW concludes it is practical and appropriate for the company to gather and use, with total emissions reflecting WTW's possible emissions in alignment with the GHG Protocol.

More generally, GHG emissions quantification is subject to significant inherent measurement uncertainty because of such things as GHG emissions factors that are used in mathematical models to calculate GHG emissions and the inability of these models, due to incomplete scientific knowledge and other factors, to accurately measure under all circumstances the relationship between various inputs and the resultant GHG emissions. Environmental and energy use data used in GHG emissions calculations are subject to inherent limitations, given the nature and the methods used for measuring

such data. The selection by management of different but acceptable measurement techniques could have resulted in materially different amounts or metrics being reported.

WTW applies a consistent approach and methodology for our GHG calculations and net zero target for our business operations, including but not limited to, calculating scope 2 emissions with the market-based approach and including both owned and leased real estate facilities. Offsets are not included in WTW's GHG emissions totals.

5.1.1 Data limitations

Reported business operations emissions include Scope 1 and 2. Limited Scope 3 emissions are also included which takes in account emissions from business travel in employee-owned vehicles where the company is responsible for purchasing the fuel (mandatory).

Proxy portfolios of listed securities are derived based on country/sector exposures for strategies where holdings-level or manager-provided data are not available. These proxy portfolios are used, where necessary, for calculating carbon emissions and footprint metrics calculations but not for climate solutions.

To derive the investment portfolios' figures that have been reported, metrics are calculated at the individual strategy level and then aggregated to the total portfolios' level. Where we have limited coverage, we report the information for the portion of the portfolio for which there is data.

Section 6 : Scenario analysis

In addition to the scenarios set out in [Section 3: Strategy](#) identifying TWIM's operational risk and opportunities, this scenario analysis sets out portfolio level climate risk considerations.

Scenario analysis is a process for identifying and assessing the potential implications of a range of plausible future states under conditions of uncertainty. Scenarios are hypothetical constructs and not designed to deliver exact outcomes or predictions. Instead, scenario analysis provides a way to consider how the future might look if certain trends continue or diverge and if certain conditions are met. In the case of climate change, for example, scenarios allow an investment manager to explore and develop an understanding of how various combinations of climate-related risks, both transition and physical risks, may affect investee companies within their portfolio in terms of their businesses, strategies, and financial performance over time.

Scenario analysis can be qualitative (relying on descriptive, written narratives) or quantitative (relying on numerical data and models) or some combination of both. Qualitative scenario analysis explores relationships and trends for which little or no numerical data is available, while quantitative scenario analysis can be used to assess measurable trends and relationships using models and other analytical techniques. Both rely on scenarios that are internally consistent, logical, and based on explicit assumptions and constraints that result in plausible future development paths.

The key building blocks used to design a climate scenario are:

- A transition narrative, describing the socioeconomic pathway followed globally/regionally, the climate policies implemented and the resulting technological and societal shifts that occur.
- The emissions pathway (typically communicated using the Representative Concentration Pathways developed by the [Intergovernmental Panel on Climate Change](#) ('IPCC')) resulting from the implementation of the policies and technologies described in the narrative and the resulting level of peak global temperature increase.
- The economic costs/benefits resulting from physical risk (derived from the level of temperature increase) and transition risks/opportunities (derived from the climate policies and technologies implemented).
- The resulting impact on financial returns of the above at the asset class, sector and potentially security level.

The key climate scenarios that we have considered for TWIM's portfolios, which are proprietary and aligned with those published by the [Network for Greening the Financial System](#) ('NGFS'), are:

Table 7 - Scenarios

	Orderly scenario	Disorderly scenario	
	Below 2°C	Delayed Transition Below 2°C	<u>Hot House World</u>
Description	Globally co-ordinated climate policies are introduced immediately, becoming gradually more stringent over time. Companies and consumers take most actions available to capture opportunities to reduce emissions, and the use of Carbon Dioxide Removal ('CDR') technologies is relatively low.	Delays in taking meaningful policy action result in a rapid policy shift around 2030. Policies are implemented in a somewhat but not completely co-ordinated manner resulting in a more disorderly transition to a low carbon economy, with availability of CDR technologies limited. Emissions exceed the carbon budget temporarily but decline more rapidly than in Below 2oC.	The world follows a Net Zero 2050 pathway; however the resultant temperature outcome exceeds 2oC due to a lower than expected remaining carbon budget and/or the impact of climate tipping points. Use of CDR technologies is relatively low.
Temperature increase	1.8°C	1.8°C	2.5-3.0°C
Physical risk level	Medium	Medium	High – Very high
Transition risk level	Low – Medium	High	High

Source: NGFS, WTW

The scenarios were created to reflect the differing paths that could be taken to meet, or fail to meet, the temperature rise target agreed as part of the [Paris Agreement](#). The target set out in the Paris Agreement is to limit global temperature rises to well below 2 degrees Celsius ('WB2C') above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. The scenarios differ in the size of the physical risks, based on the resulting temperature impacts, but also in the size of the transition risks.

The Hot House World scenario considers the uncertainty associated with the carbon budgets assumed in mainstream scenarios and in particular, the possibility that these are overestimated. In this scenario

the world attempts to transition in line with a WB2C pathway but because real world carbon budgets are lower than estimated a high level of temperature increase still occurs resulting in the realisation of material transition risks and physical risks concurrently.

The three scenarios selected reflect an appropriate range of plausible decarbonisation pathways and are relevant in the context of TWIM's portfolios and objectives. There is the potential for more extreme outcomes than reflected in the chosen scenarios. Although consideration has been given to the possibility that carbon budgets are lower than anticipated in existing scenarios, our scenarios do not currently include climate "tipping points" which, if crossed, would potentially result in future temperatures being higher than predicted for a given level of future emissions and/or the impact of physical risks at a given temperature level being significantly greater than is currently predicted by most economic models for climate change.

We view tipping points as a longer-term risk, with transition risks dominating in the shorter term and physical risks/tipping points then becoming increasingly material as the time horizon for analysis increases. This said, we recognise that longer-term risks may be priced in by markets over the nearer term and the timing of this is highly uncertain. The significant potential downside risks associated with physical climate risks mean that, similar to how other investment downside/tail risks are managed, it is rational for both medium and long-term investors to take actions now to understand/quantify and manage climate-related financial risks to their portfolios.

Some other considerations that are applied when considering tipping points in the context of climate scenario analysis:

- Existing climate scenarios are simplified and stylised (as with any set of scenarios). The real world is a complex adaptive system which is very hard to capture using any quantitative model, no matter how sophisticated.
- There is a limit to model tractability and the precision of scenario analysis. It is tempting to try to build ever more sophisticated models in the pursuit of precision, but it is not a given that a more sophisticated model will derive a more accurate outcome.
- Given the likely magnitude of the impacts of tipping points we believe that a high-level approach to quantitative analysis supported by qualitative analysis/narrative is likely to be the most fit-for-purpose approach.
- Due to the points above, when applying climate scenarios and identifying possible actions to take as a result of the analysis, it is often reasonable to further overweight risk management actions to mitigate model risk.

Climate Value at Risk ('CVaR')

CVaR is a forward-looking measure of the exposure of a portfolio to climate risks and is based on bottom-up analysis of the impact of climate physical and transition risks on individual companies, by considering a wide range of underlying climate-related issues that are expected to influence the drivers of investee company cashflows. This includes:

- The range of natural hazards/physical perils that are expected to manifest under various temperature increase scenarios as well as the long-term chronic impacts of climate change; and;

- The impact of the various policy, technology and socioeconomic changes associated with the various transition narratives considered. In applying the scenarios to derive a CVaR figure it is assumed that the future transition outcomes under a BAU/continuation of current policies scenario are broadly reflective of what is likely priced into markets in aggregate.

The resulting CVaR figures for the TWIM portfolio under each of the scenarios considered is set out in the table below. This can be thought of as the potential impact on the portfolio if markets were to immediately price in the expected impact of physical and transition risks under each of the scenarios immediately. We also recognise the uncertainty in the underlying assumptions and that, in reality, the shocks experienced could be larger.

Table 8 – CVaR under climate scenarios (%)

Scenario	CVaR (% of portfolio)		
	Physical risk	Transition risk	Total
Orderly	-4.21%	-2.35%	-6.56%
Disorderly	-4.21%	-5.10%	-9.31%
Hot House World	-14.54%	-3.30%	-17.84%

Source: MSCI, NGFS, WTW

Table 9 – CVaR under climate scenarios (\$m)

Scenario	CVaR (\$m)		
	Physical risk	Transition risk	Total
Orderly	-830.68	-463.83	-1,294.51
Disorderly	-830.68	-1,006.22	-1,836.90
Hot House World	-2,870.31	-650.69	-3,521.00

Source: MSCI, NGFS, WTW

The figures above are based on a portfolio size of \$19,740m as at 31 December 2023.

What does the CVaR analysis show?

The CVaR analysis shows that the impact across scenarios mirrors the broad trends in the wider market however asset class diversification is of a lot of benefit. The most substantial effects manifest under scenarios associated with the highest temperature outcomes and heightened exposure to physical risks.

Within this context, the selection of managers and active engagement emerge as the critical determinant for influencing outcomes. A bottom-up evaluation of transition risk exposures informs ongoing monitoring and engagement initiatives with managers. Moreover, the relative magnitude of physical risks compared to transition risks serves as a guiding factor in decision-making, guiding the adoption of net-zero pledges and investment strategies conducive to facilitating a transition to a low-carbon economy.

Section 7 : Statement of compliance

In accordance with 'ESG 2.2 TCFD entity report' of the FCA Handbook, this report sets out our disclosures in line with the recommendations of the Taskforce on Climate-related Financial Disclosures ('TCFD') for Towers Watson Investment Management Limited ('TWIM').

The disclosures in this report, are consistent with the TCFD Recommendations and Recommended Disclosures. Reasonable steps have been taken to ensure that disclosures, to the extent they are relevant and/or possible, also reflect sections C and D of the TCFD Annex entitled 'Guidance for All Sectors' and 'Asset Managers', respectively. We view climate-related disclosures as evolutionary and endeavor to continue to improve on our disclosures.

The Sustainability Regulations and Monitoring Committee will continue to oversee compliance with TCFD requirements and recommendations as the reports is moved into business as usual ('BAU') reporting.

This statement is made in accordance with TCFD disclosures for the year ending 31 December 2023 and has been sent to the TWIM Board for approval and was approved by the Board of Directors of TWIM on 25 June 2024, as reflected by the Director's signature below.



Mark Calnan

Towers Watson Investment Management Limited
25 June 2024

Section 8 : Disclaimers

Legal Notices

MSCI ESG Research

This disclosure was developed using information from MSCI ESG Research LLC or its affiliates or information providers. Although TOWERS WATSON INVESTMENT MANAGEMENT LIMITED’S (“TWIM’s) information providers, including without limitation, MSCI ESG Research LLC and its affiliates (the “ESG Parties”), obtain information (the “Information”) from sources they consider reliable, none of the ESG Parties warrants or guarantees the originality, accuracy and/or completeness, of any data herein and expressly disclaim all express or implied warranties, including those of merchantability and fitness for a particular purpose. The Information may only be used for your internal use, may not be reproduced or disseminated in any form and may not be used as a basis for, or a component of, any financial instruments or products or indices. Furthermore, none the of Information can in and of itself be used to determine which securities to buy or sell or when to buy or sell them. None of the ESG Parties shall have any liability for any errors or omissions in connection with any data herein, or any liability for any direct, indirect, special, punitive, consequential or any other damages (including lost profits) even if notified of the possibility of such damages.

WTW

Scenarios are hypothetical constructs and not designed to deliver exact outcomes or predictions. Instead, scenarios provide a way to consider how the future might look if certain trends continue or diverge and if certain conditions are met.

Metrics selected have been used as they are common business metrics for our industry sector. Data timeframe alignment is as close as is reasonably practical. For example, emissions data covers the calendar year reporting period, but revenue figures related to the WACI cover the financial year best aligned to the reporting period.

Different approaches are followed to arrive at strategy level climate characteristics depending on the situation. These are described below.

Situation 1: Underlying issuer-specific climate data related to holdings in a strategy is available (this is the case for strategies investing in listed securities)

- Strategy-level holdings data is obtained from the relevant underlying external asset managers, custodians or index providers as appropriate.

- Issuer-level climate and fundamental data is sourced from MSCI and applied to the actual holdings data.

Situation 2: Issuer-specific climate data related to holdings in a strategy is not available, but the underlying external manager, who undergoes a thorough due diligence process, is able to provide emission and climate information related to the strategy as a whole

- Strategy level climate and fundamentals data is sourced from the external asset manager (this is requested via a survey sent out on an annual basis)

In situation 2, the accuracy of the metrics is contingent upon each underlying external manager's individual interpretation of the data request, including their understanding of the definitions of each metric provided.

Situation 3: Issuer-specific climate data related to holdings in a strategy is not available and the external asset manager is not able to provide emission and climate information related to the strategy as a whole.

- Proxy portfolios of listed securities are derived based on the strategy's country/sector exposures.

These proxy portfolios are used for calculating carbon emissions and footprint metrics calculations but are not to be used for or are an indication of potential climate solutions.

- Issuer-level climate and fundamental data is sourced from MSCI and applied to the proxy portfolios.

In situation 3, the accuracy of the metrics is contingent upon the extent to which the country/sector exposures provided, and the resulting proxy portfolio is representative of the actual exposures in the strategy.

Scenario analysis is a process for identifying and assessing the potential implications of a range of plausible future states under conditions of uncertainty. Scenarios are hypothetical constructs and not designed to deliver exact outcomes or predictions. Instead, scenarios provide a way to consider how the future might look if certain trends continue or diverge and if certain conditions are met.

Some of the goals, targets, commitments, impacts, policies, and programmes described in this disclosure are also dependent on future actions, collaboration and/or commitments taken by governments, private and public sector firms and wider systems.

A number of risks and uncertainties could cause actual results to differ materially from the results reflected in the forward-looking metrics and statements that are identified within this disclosure. These statements

are based on assumptions that may not come true and are subject to significant risks and uncertainties.

Although we believe that the assumptions underlying our forward-looking metrics and statements are reasonable as of today's date, any of these assumptions, and therefore also the forward-looking metrics and statements based on these assumptions, could themselves prove to be inaccurate. Given the significant uncertainties inherent in the forward-looking metrics and statements included in this disclosure, our inclusion of this information is not a representation or guarantee by us that these outcomes will occur.

This disclosure and the forward-looking metrics and statements contained herein (together with other company documents) speak only as of the date made and we will not update this disclosure or these forward-looking statements or other documents. With regard to these risks, uncertainties and assumptions, the forward-looking events discussed in this document, and others, may not occur, and we caution you against unduly relying on these forward-looking statements.

Any assumptions, scenario analysis and metrics used in this disclosure have been derived using a blend of economic theory, historical analysis and opinions provided by external asset managers, and/or advisers. They inevitably contain an element of subjective judgement. Any opinions or return forecasts on asset classes contained in this disclosure are not intended to imply, nor should they be interpreted as conveying, any form of guarantee or assurance regarding the future performance of the asset classes in question. No economic model can be expected to capture perfectly future uncertainty, particularly the risk of extreme events.

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Section 9 : Glossary

C

Carbon Dioxide Removal: Refers to technologies, practices, and approaches that remove and durably store carbon dioxide (CO₂) from the atmosphere¹.

Climate Action 100+: Climate Action 100+ is an investor-led initiative to ensure the world's largest corporate greenhouse gas emitters take necessary action on climate change².

D

Disorderly scenario: Delays in taking meaningful policy action result in a rapid policy shift around 2030. Policies are implemented in a somewhat but not completely co-ordinated manner resulting in a more disorderly transition to a low carbon economy, with availability of CDR technologies limited. Emissions exceed the carbon budget temporarily but decline more rapidly than in Below 2°C³.

G

Greenwashing: Behaviour or activities that make people believe that a company is doing more to protect the environment than it really is⁴.

H

Hot House World scenario: The world follows a Net Zero 2050 pathway; however the resultant temperature outcome exceeds 2°C due to a lower than expected remaining carbon budget and/or the impact of climate tipping points. Use of CDR technologies is relatively low⁵.

O

Orderly scenario: Globally co-ordinated climate policies are introduced immediately, becoming gradually more stringent over time. Companies and consumers take most actions available to capture opportunities to reduce emissions, and the use of Carbon Dioxide Removal ('CDR') technologies is relatively low⁶.

N

¹ Source: The intergovernmental Panel on Climate Change

² Source: Climate Action 100+.

³ Source: NGFS, WTW

⁴ Source: Cambridge Dictionary

⁵ Source: NGFS, WTW

⁶ Source: NGFS, WTW

Net Asset Value: Is the total value of the assets of a company after its total debt has been subtracted¹.

Network for Greening the Financial System: It was launched at the Paris One Planet Summit on 12th December 2017. It is a group of Central Banks and Supervisors willing, on a voluntary basis, to share best practices and contribute to the development of environment and climate risk management in the financial sector and to mobilise mainstream finance to support the transition toward a sustainable economy².

S

SBTi: The SBTi defines and promotes best practice in science-based target setting. Offering a range of target-setting resources and guidance, the SBTi independently assesses and approves companies' targets in line with its strict criteria³.

Scope 1: Scope 1 GHG emissions are “direct” emissions – those that a company causes by operating the things that it owns or controls. These can be a result of running machinery to make products, driving vehicles, or just heating buildings and powering computers⁴.

Scope 2: Scope 2 GHG are “indirect” emissions created by the production of the energy that an organisation buys. Installing solar panels or sourcing renewable energy rather than using electricity generated using fossil fuels would cut a company's Scope 2 emissions⁵.

Scope 3: Scope 3 emissions are also indirect emissions – meaning those not produced by the company itself – but they differ from Scope 2 as they cover those produced by customers using the company's products (downstream emissions) or those produced by suppliers making products that the company uses (upstream emissions)⁶.

¹ Source: Cambridge Dictionary

² Source: Network for Greening the Financial System.

³ Source: Science Based Targets initiative

⁴ Source: World Economic Forum, WTW

⁵ Source: World Economic Forum, WTW

⁶ Source: World Economic Forum, WTW

About WTW

At WTW (NASDAQ: WTW), we provide data-driven, insight-led solutions in the areas of people, risk and capital. Leveraging the global view and local expertise of our colleagues serving 140 countries and markets, we help you sharpen your strategy, enhance organisational resilience, motivate your workforce and maximise performance. Working shoulder to shoulder with you, we uncover opportunities for sustainable success — and provide perspective that moves you. Learn more at [wtwco.com](https://www.wtwco.com).