

LGIM's Climate Impact Pledge: the 2021 results

Engaging for positive change on
an era-defining challenge





Iancu Daramus
Senior Sustainability Analyst



Yasmine Svan
Senior Sustainability Analyst



Cristy Rodriguez
ESG Analyst

Executive summary

- In 2020, we strengthened and expanded our Climate Impact Pledge – our dedicated engagement program on climate issues – to focus on around 1,000 global companies in 15 climate-critical sectors.
- In our first report under our new approach, we announce that:



We will divest across select portfolios from four companies for failing to respond satisfactorily to our engagement efforts;



A further nine companies remain on our existing exclusion list;



We will vote against 13 additional companies as a sanction;



Successful engagement has led us to reinstate one previously divested company into a range of sustainability-focused strategies;



During the 2021 proxy season, 130 companies are currently subject to voting sanctions for not meeting our minimum climate change standards.

The full list of the companies divested, sanctioned, and reinstated – along with our rationale – is included in this report, together with case studies of our engagements with companies on our priority list in each sector.

We also present a data-driven overview of how our climate ratings have evolved across different sectors and regions.



Introduction

Michelle Scrimgeour

CEO, Legal & General Investment Management, and co-chair of COP26 Business Leaders

The 2021 United Nations Climate Change Conference (COP26) takes place in November, and I am delighted that I will have the opportunity to participate through the COP26 Business Leaders Group.

As I write this in June, I do not yet know whether we will be able to attend the meeting in person. I do know, however, that whether the event is virtual or not, we collectively must deliver real action.

The questions, of course, are what actions to take and how to persuade those who have reservations about the actions required – those who feel the time is too early or too late, the costs too high, the status quo acceptable.

To them, I believe we can make a positive case for action – one of innovation and the growth potential of a greener economy, but just as importantly one that does not leave anyone behind. It is in this context that I am excited to share the latest update from our longstanding engagement program, the Climate Impact Pledge.

You will see in the following pages that progress is being made across many of the most climate-critical areas of the global economy, although much remains to be done. You will also find a case study of a company from which we had previously divested for falling short of our minimum climate standards, but which has demonstrated sufficient improvement following our engagement efforts to be reinstated to select strategies. Equally, the report details the decisive sanctions we have imposed where companies have not met our expectations.

In clearly setting out these expectations for climate-critical companies, I believe furthermore that this report provides some answers to that first question of what action can and should be taken. Within our own business areas, for example, we call for an investment transition from ‘brown’ to ‘green’ projects and assets.

I am proud that LGIM is a founding signatory of the Net Zero Asset Managers Initiative, while our default funds – representing over four million members across the L&G Workplace Pensions and L&G Mastertrust* – have set interim targets to support their 2050 net-zero ambitions and our parent group L&G is aligning its balance sheet to net-zero emissions.

Each of the companies in which we invest on our clients’ behalf has many stakeholders beyond us as asset managers, including its employees and suppliers. Climate change will affect every single one of these stakeholders, not least given its growing financial materiality, so we must use our influence as shareholders to raise standards across the entire market for the benefit of all.

In so doing, we can deliver upon the promise of inclusive capitalism and create a better future through responsible investing.

*Reference to L&G products is not a recommendation to buy or sell securities or pursue a particular investment strategy.

Why and how are we assessing companies on climate issues?

Our ambition has always been to raise standards across and within sectors.

When we launched our Climate Impact Pledge in 2016, we focused our engagement on the largest, more influential companies in the sector. In 2020, aided by improvements in data availability, we expanded the coverage tenfold to cover substantially more sectors, with clear voting sanctions for the companies not meeting all our minimum standards.

From apparel and airlines to technology companies and utilities, we have identified approximately 1,000 companies in 15 climate-critical sectors that are responsible for more than half of greenhouse gas emissions from listed companies.

Drawing on around 40 datapoints leveraging LGIM’s own climate modeling as well as third-party data, our company assessments are focused on five key pillars:



1

Governance

How is the oversight of climate issues exercised at the board level and communicated to investors?

Climate governance

Disclosure - TCFD reporting and Scope 3 emissions

2

Strategy

What policies do companies have in place, and what policies are they lobbying governments for?

Company policies

Climate lobbying

3

Risks and opportunities

How much of companies’ current earnings comes from ‘green’ activities, and how much of potential future earnings is at risk in the low-carbon transition?

Climate Value-at-Risk

Green opportunities

4

Scenario analysis

What level of global warming are companies’ plans aligned to?

Paris alignment

5

Metrics and targets

How ambitious are companies’ emission targets, and how do they compare to past performance?

Net Zero ambition

Emissions intensity and trajectory



In the spirit of transparency, we have made our climate ratings publicly available under a ‘traffic light’ system, alongside details of our key expectations and ‘red lines’ in each sector.

Illustrative company ratings under our dashboard

Orsted A/S

Sector: Utilities
Region: Europe ex UK
ISIN: DK0060094928

LGIM Climate Impact Pledge dashboard

The company's performance against key indicators is shown in a 'traffic light' system below. LGIM encourages companies to address any highlighted gaps in their disclosure and strategies, and will sanction companies falling short of its minimum standards. Aggregate ratings against 5 categories are shown for comparability only.

Scores are updated bi-annually. This rating was last updated 31/07/2020.

[Have questions about the data? >](#)

87 / 100

Governance

See scoring metrics >

50 / 100

Scenario Analysis

See scoring metrics >

100 / 100

Metrics & Targets

See scoring metrics >

67 / 100

Risks & Opportunities

See scoring metrics >

87 / 100

Strategy

See scoring metrics >

Illustrative sector guides available on our dashboard



Legal & General's commitment to decarbonisation

In line with our longstanding commitment to sustainability and inclusive capitalism, in 2020 Legal & General formally added addressing climate change as one of our six strategic priorities. It is now embedded in how we run our business, from how we invest our proprietary assets to how we exert our influence as one of Europe's largest asset managers. The breadth of our businesses, from insurance to investment management to housebuilding, gives us multiple levers to improve environmental outcomes; our scale enables us to deliver meaningful change.



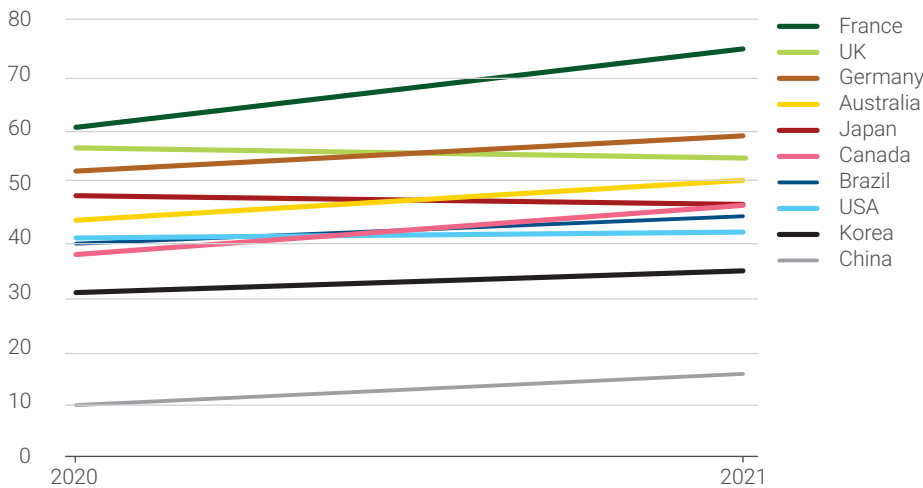
How are our ratings evolving

We are encouraged to see a positive trend across a majority of regions and sectors.

Average ratings (out of 100) in key regions and select countries

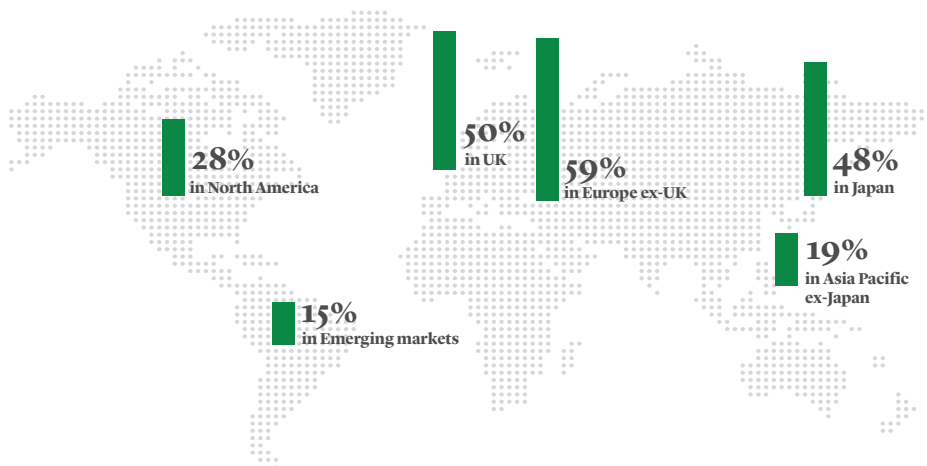
	Europe (ex UK)	UK & Ireland	North America	Emerging markets	Japan	Asia Pacific (ex Japan)
April 2021 rating (avg.)	61	61	43	27	46	44
Change since 2020 (%)	15%	5%	8%	21%	-3%	11%

Europe continues to lead in our climate analysis, but Asia is fast catching up



Source: LGIM, as at April 2021

Companies meeting minimum standards by region

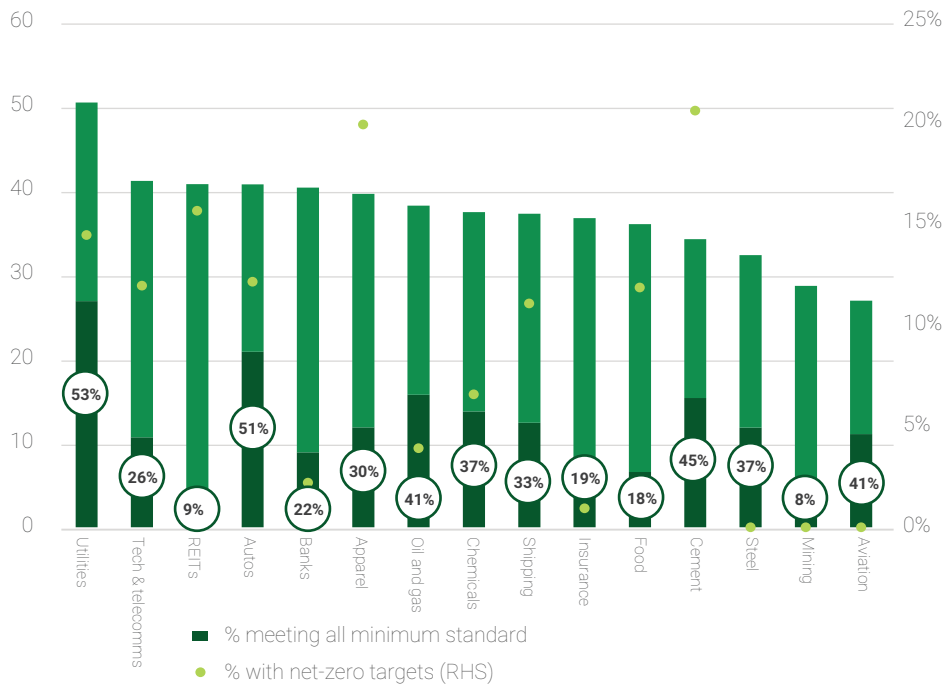


Source: LGIM, as at April 2021

In terms of average ratings, Asian companies have now overtaken North America, with the largest relative increase since 2020 coming from emerging markets.

However, less than a fifth of Asia Pacific companies and a third of North American companies meet all our minimum standards.

Average climate ratings, minimum standards and net-zero ambitions across sectors



Looking at different sectors, utilities lead our current rankings, while steel, mining and aviation lag.

Source: LGIM, as at April 2021. The height of the bar represents the average climate rating within each sector (LHS). The numbers in circles denote the percentage of each sector meeting all of our minimum standards.

Despite progress across most sectors, the gap between leaders and laggards remains. Full compliance with our minimum climate standards is rare, even in the sectors which are most advanced along the low-carbon transition...

...but the net-zero momentum is unmistakable: **the overall number of companies setting net-zero targets has almost doubled since October 2020.**

Engagement in detail

The following pages explain how we translate these dynamics into voting sanctions.

To help improve climate accountability across sectors, under our expanded policy in 2020 we announced that we would be voting against all companies globally not meeting at least one – or, for companies in North America and Europe, three – of the minimum standards outlined below. The stringency of both our requirements and the sanctions will increase over time.

Minimum voting standards under the Climate Impact Pledge



Does the company...

Sectors

Data provider

Have board member(s) with responsibility for climate-related issues?	All	CDP
Have comprehensive climate disclosures?	All	Sustainalytics
Have an environmental policy?	All except financials and apparel	
Have a greenhouse-gases reduction programme?		
Have a (no) deforestation programme?	Food	
Have sustainability-linked underwriting standards?	Insurance	
Have a responsible investment programme?		
Have sustainability-linked credit & loan standards?	Banks	
Consider environmental impact in product design?	Apparel	
Disclose life-cycle assessment (LCA) of emissions?	REITs	
Demonstrate a reduction in emissions intensity?	All	ISS



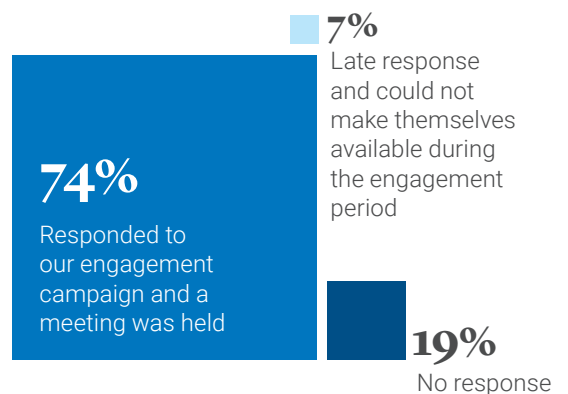
During the 2021 proxy season, 130 companies are currently subject to voting sanctions for not meeting our minimum climate-change standards.



By linking the votes to specific data points aligned with our principles-based approach, our aim was to exert our influence more consistently and widely across markets, with automatic alerts to companies at risk of being voted against by us.³

However, we also recognize the importance of deeper individual engagements. That is why, across the sectors under our Climate Impact Pledge, we have selected 58 companies for in-depth engagement, in which sector experts from across LGIM's investment teams participate alongside our stewardship team. These 58 companies are influential in their sectors, but in our view are not yet leaders on sustainability; we believe they can and should embrace the transition to net-zero carbon emissions in the next few years.

Overall, we were encouraged by the positive response rate:



Source: LGIM, as at April 2021

3. Subject to the availability of contact details for companies, particularly in emerging markets.

The following table provides some details on our key areas of focus, with newly engaged sectors highlighted in red.



Sector	Our expectations	Recent engagements*
Oil and gas	Setting targets for their own operations, and providing information on the alignment of capital expenditure and production plans with climate outcomes.	Following commitments to substantial production cuts this decade, BP has now strengthened its criteria around capital expenditures, with higher hurdle rates and carbon prices, as part of its strategy towards net zero. As investors co-leading engagements with the company under the Climate Action 100+ programme, we will continue the dialogue around the strength and comprehensiveness of BP's targets and the direction of its strategy.
Mining	Accelerating the transition towards transition-enabling metals and minerals and the shift away from fossil fuels.	Glencore raised the bar in the industry by setting a 2050 net-zero target that includes all the emissions associated with its products, but we will continue to press the company on the strength of its interim emissions targets and the speed at which it plans to 'run off' its coal mines, given the need to rapidly phase out coal globally for the world to meet its climate goals.
Electric utilities	Scaling up renewables and phasing out thermal coal.	We are encouraged that Korean utility KEPCO has made a commitment not to pursue any new opportunities to construct thermal coal plants, but we remain very concerned that two existing plants in the company's pipeline will still go ahead.
Steel and Cement	Growing rates of recycling and decarbonizing industrial processes.	For steelmakers using electrical furnaces, decarbonizing their energy supply is critical. We were pleased to note that Nucor recently announced a deal to build a large solar park in Texas, but remain concerned that the company has not yet set an operational emissions reduction target. Our engagement with the cement sector purposely targets only Chinese companies as China is the world's largest cement maker. We have been alarmed by the companies' lack of response to investor engagement, given how critical this sector and market is to global decarbonization efforts.
Chemicals	Investing in alternative feedstocks and decarbonizing industrial processes.	We are pleased to note that Norwegian company Yara set a net-zero target and invested in green ammonia, which may be a critical technology to decarbonize shipping and other industrial processes. Other companies in the sector will need to step up their efforts to avoid future sanctions.
Autos	Building alternative powertrains, scaling up charging infrastructure, and improving the range of electric vehicles	We are pleased to note several engagement successes in this sector. Ford and Honda have announced net-zero by 2050 targets, while General Motors has committed to carbon neutrality by 2040; all three automakers also set timebound targets for phasing out petrol and diesel vehicle sales, in at least some markets. Improvement remains to be seen in some practices, but we have noted a significant improvement in the disclosure of climate-related lobbying, which we have been pushing for since 2017.
Airlines	Identifying the fuel of the future.	The aviation sector is further behind on decarbonization than others, due to some extent to a lack of alternative fuels and the challenges brought by the pandemic. We were pleased to note that following our engagement, Southwest Airlines announced a net-zero by 2050 target.

*For illustrative purposes only. Reference to a particular security is on a historical basis and does not mean that the security is currently held or will be held within an LGIM portfolio. The above information does not constitute a recommendation to buy or sell any security.



Sector



Our expectations



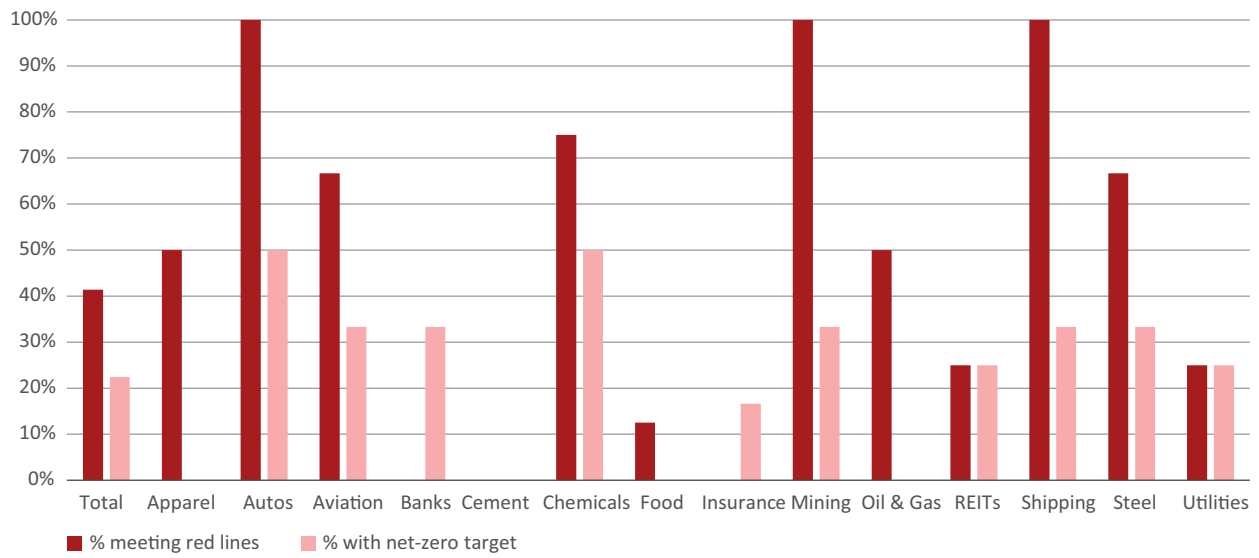
Recent engagements*

Sector	Our expectations	Recent engagements*
Apparel	Improving circularity of materials and rooting out deforestation from supply chains.	We note a polarised level of ambition on climate management, with large gaps between the leaders and the laggards. There also appears to be a geographical split, with European and Japanese companies further ahead than their American peers among the group targeted for engagement.
Food	Shifting away from high-impact products and decarbonizing agricultural supply chains.	While several food companies are not meeting our expectations around minimum standards, we were pleased to note that Kroger has made significant improvements on its deforestation policies and disclosure. The company is also making efforts on promoting plant-based products which have a lower climate impact. We have therefore decided to reinstate the company into the funds which apply the Climate Impact Pledge.
Banks	Shifting financing away from 'brown' to 'green'.	In 2020, following more than three years of dedicated engagement by LGIM, JPMorgan announced plans to align its financing of three sectors with the goals of the Paris Agreement. We will continue to follow developments closely, particularly how these targets are reflected in the bank's financing mix going forward, and continue to encourage the bank to expand the sectors covered by its commitment.
REITs	Adopting operational emissions reductions.	Real-estate companies' approach to climate risk, and net zero in particular, shows tremendous variation across subsectors (companies focused on office buildings performing better than other specialty REITs) and regions (European companies leading). The varied data points and responses to our 'red line' on emissions reductions reflect an industry quickly moving up the climate curve.
Shipping	Operational innovations to increase fuel efficiency, low-carbon fuel switching, and investment and uptake of low-emission technologies.	We were pleased to see NYK's strategic focus on climate change, the setting of science-based targets and the way in which it is engaging its value chain on low-emission solutions. Misc BHD is demonstrating its commitment to developing zero-emission vessels by 2030, in particular through its membership of the Getting to Zero Coalition. Regulatory forces are driving the shipping sector to focus on reducing emissions, with the IMO 2030 and 2050 targets widely adopted by companies. However, decarbonizing the sector is complex and will require technological innovation and significant investment; we'll continue to engage companies on their strategy and action to deliver on their targets.
Insurance	Shifting investments and underwriting activities from 'brown' to 'green'.	We were pleased to see AIA Group set out its commitment and take action to address its investment exposure to mining and coal-fired power businesses. Following its accession to the Net Zero Asset Owner Alliance in early 2020, MunichRe announced its commitment to a GHG-neutral investment portfolio by 2050 – a step we need more companies in the sector to take. However, momentum on net zero across the sector must be matched by more widespread disclosure of Scope 3 emissions reporting for investment portfolios.

*For illustrative purposes only. Reference to a particular security is on a historical basis and does not mean that the security is currently held or will be held within an LGIM portfolio. The above information does not constitute a recommendation to buy or sell any security.

13 out of the 58 companies we engaged in depth now have a net-zero target in place, but significant variation remains, not least in terms of meeting our minimum ‘red lines’ illustrated below.

Minimum expectations and net zero ambitions for companies on LGIM's engagement priority list



Source: LGIM, as at April 2021. Note the above chart refers to the 58 companies selected for deeper engagement, not the entire universe of companies under our pledge.

‘Red lines’ for LGIM’s priority engagement companies	Sectors
No operational emissions target	Cement, Airlines, Shipping, Steel, REITs, Tech and telecoms
No disclosure of Scope 3 emissions	Banks, Insurance, Mining, Oil and gas, Apparel, Autos
No restrictions around coal underwriting/investing	Banks, Insurance
Plans to increase thermal coal capacity	Mining
No plans for coal phase-out	Utilities
Plans to increase ‘extreme’ oil (bitumen extraction, Arctic oil)	Oil & gas
Lack of a comprehensive deforestation policy	Apparel, Food

Where companies have fallen short due to a lack of response to our engagement requests and/or crossing one of our ‘red lines’, this has led to sanctions, as detailed below.

Sanction list

We are keeping nine companies on our sanction list from previous years, and adding four more companies this year. We have removed one company from our sanction list, and reinstated it in select funds.

Sector	Companies*	Rationale	Action
Apparel	Ross Stores	No Scope 3 disclosure or deforestation policy in place.	Vote against
	TJX	No Scope 3 disclosure or deforestation policy in place.	
Aviation	China Air	No operational emissions reduction target in place, no response to investor engagement.	Vote against
Banks	HCFC	No thermal coal policy in place and disclosure of Scope 3 emissions associated with investments.	
	China Construction Bank (CCB)	No thermal coal policy in place and disclosure of Scope 3 emissions associated with investments.	
	Industrial and Commercial Bank of China (ICBC)	No thermal coal policy in place and disclosure of Scope 3 emissions associated with investments.	
Insurance	MetLife	Some restrictions on thermal coal have been introduced, but not yet disclosing Scope 3 emissions associated with investments.	Remain divested
	Japan Post	No thermal coal policy in place and disclosure of Scope 3 emissions associated with investments.	Remain divested
	AIG	No thermal coal policy in place and disclosure of Scope 3 emissions associated with investments.	Divest
Chemicals	Corteva	No operational emissions reduction target in place.	Vote against
Cement	Anhui Conch		
	China Resources Cement		
REITS	Invitation Homes		
	Equity Residential		
Steel	Nucor		
Utilities	KEPCO	No timebound target to phase out coal power generation. Pressing ahead with plans to build two new thermal coal plants.	Remain divested
	PPL	No timebound target to phase out coal power generation.	Divest

Oil and Gas	Canadian Natural Resources	No disclosure of Scope 3 emissions associated with sold products.	Vote against
	ExxonMobil	Reporting Scope 3 emissions, but operational emissions reduction target remains unambitious and misaligned with Paris.	Remain divested
	Rosneft	Reporting Scope 3 emissions and has operational targets out to 2035, but these fall short in terms of ambition.	Remain divested
Food	Sysco	The company does not have comprehensive deforestation policy in place and its emissions reduction targets fall short in terms of ambition.	Remain divested
	Hormel	The company has made improvements with regards to its deforestation policy and disclosure. However, it does not have a regenerative agriculture policy, is not disclosing agricultural Scope 3 emissions, and has not yet set a target for these types of emissions.	Remain divested
	Loblaw	The company's deforestation policy does not cover key commodities such as beef and soy. It has not yet disclosed Scope 3 emissions for own-brand products and does not evidence regenerative agriculture policies.	Remain divested
	Kroger	The company has introduced a comprehensive deforestation policy and is evidencing compliance with this policy via CDP Forests. Company also has a 2C-aligned operational emissions reduction target and is evidencing a merchandising strategy for products with a smaller climate impact.	Reinstate
	China Mengniu Dairy	The company does not have a zero-deforestation policy, is not disclosing agricultural Scope 3 emissions, and has no targets in place for these emissions.	Divest
	Domino's Pizza	No deforestation policy in place and no emissions reduction targets.	Vote against

*For illustrative purposes only. Reference to a particular security is on a historical basis and does not mean that the security is currently held or will be held within an LGIM portfolio. The above information does not constitute a recommendation to buy or sell any security.

LGIM and net zero

In December 2020, LGIM was a founding signatory to the Net Zero Asset Managers Initiative, which is committed to supporting the goal of net-zero greenhouse-gas emissions by 2050 or sooner and to supporting investing aligned with net-zero emissions by 2050 or sooner.

By signing up to the Net Zero Asset Managers Initiative, LGIM is committing – in partnership with and on behalf of our clients – to invest in alignment with the net-zero emissions framework by 2050 or sooner.

Delivering on this ambition requires substantial change across the global economy and LGIM will be at the heart of these efforts.

”

Michelle Scrimgeour

LGIM's chief executive officer and a member of UK Government's COP26 Business Leaders Group

Our Climate Impact Pledge began as a program focused on 80 companies, with divestment sanctions associated with a single fund. It has now expanded to over 1,000 companies, with potential exclusions applied over £58 billion* of our assets, including all auto-enrollment default funds in L&G Workplace Pensions and the L&G Mastertrust.**

The rapid growth in available data and analytics has allowed us to increase our coverage and to enforce our minimum standards through automatic voting sanctions, supplemented by our in-depth engagement with pivotal sectors.

At the same time as investors step up their scrutiny of companies, so too are companies raising their ambitions. We are pleased to be able to add to the number of companies reinstated in our funds following progress and will continue our engagement and collaboration to help increase standards across markets.

Stronger regulation of climate risks and a truly global approach can take us some of the way towards averting a climate disaster, and we hope to see progress on these fronts at COP26 later this year. But much of the heavy lifting will ultimately need to be carried out by the private sector, in our view, and so we will remain committed on this issue as a truly responsible investor seeking to create a better future.



* Source: as at March 2021.

**Reference to L&G products is not a recommendation to buy or sell securities or pursue a particular investment strategy.

A proven record of climate stewardship and engagement

In 2020, LGIM was ranked highest among asset managers for our approach to climate change in a review by NGO ShareAction, with the UN-backed Principles for Responsible Investment (PRI) also selecting us as part of its 'leaders group' on climate change. In early 2021, Corporate Adviser found LGIM the highest-ranking asset manager in a meta-study of industry metrics of actions taken by institutional investors on ESG and climate change.

“
Legal & General Investment Management continue to exhibit best practice [... they] are fully transparent in their stewardship processes and show specific evidence of engagement with companies on the transition of the business model and lobbying practices.

”
 InfluenceMap¹⁰

For the second year running, LGIM was ranked top among the world's largest asset managers for engagement on climate change by NGO InfluenceMap.

Engagement scores

	2020	2019
LGIM	A+	A+
Manager 1	B+/A-	B+/NA
Manager 2	A-	B+
Manager 3	B	C+
Manager 4	B-	B-
Manager 5	C	C-
Manager 6	C	C
Manager 7	C	C
Manager 8	C-	D
Manager 9	D	D-

Source: Asset Managers and Climate Change 2021, InfluenceMap, January 2021.

Contact us

For further information about LGIM America, please visit lgima.com or contact your usual LGIM America representative

Important information

Unless otherwise stated, references herein to "LGIM", "we" and "us" are meant to capture the global conglomerate that includes Legal & General Investment Management Ltd. (a U.K. FCA authorized adviser), LGIM International Limited (a U.S. SEC registered investment adviser and U.K. FCA authorized adviser), Legal & General Investment Management America, Inc. (a U.S. SEC registered investment adviser) and Legal & General Investment Management Asia Limited (a Hong Kong SFC registered adviser). The LGIM Stewardship Team acts on behalf of all such locally authorized entities. © 2021 Legal & General Investment Management Limited. All rights reserved. No part of this publication may be reproduced or transmitted in any form or by any means, including photocopying and recording, without the written permission of the publishers.

The information contained in this document (the 'Information') has been prepared by LGIM Managers Europe Limited ('LGIM Europe'), or by its affiliates ('Legal & General', 'we' or 'us'). Such Information is the property and/or confidential information of Legal & General and may not be disclosed by you to any other person without the prior written consent of Legal & General.

No party shall have any right of action against Legal & General in relation to the accuracy or completeness of the Information, or any other written or oral information made available in connection with this publication. Any investment advice that we provide to you is based solely on the limited initial information which you have provided to us. No part of this or any other document or presentation provided by us shall be deemed to constitute 'proper advice' for the purposes of the Investment Intermediaries Act 1995 (as amended). Any limited initial advice given relating to professional services will be further discussed and negotiated in order to agree formal investment guidelines which will form part of written contractual terms between the parties.

Past performance is no guarantee of future results. The value of an investment and any income taken from it is not guaranteed and can go down as well as up; you may not get back the amount you originally invested.

The Information has been produced for use by a professional investor and their advisors only. It should not be distributed without our permission.

The risks associated with each fund or investment strategy are set out in this publication, its KIID, the relevant prospectus or investment management agreement (as applicable) and these should be read and understood before making any investment decisions. A copy of the relevant documentation can be obtained from your Client Relationship Manager.

Confidentiality and limitations:

Unless otherwise agreed by Legal & General in writing, the Information in this document (a) is for information purposes only and we are not soliciting any action based on it, and (b) is not a recommendation to buy or sell securities or pursue a particular investment strategy; and (c) is not investment, legal, regulatory or tax advice. Any trading or investment decisions taken by you should be based on your own analysis and judgment (and/or that of your professional advisors) and not in reliance on us or the Information. To the fullest extent permitted by law, we exclude all representations, warranties, conditions, undertakings and all other terms of any kind, implied by statute or common law, with respect to the Information including (without limitation) any representations as to the quality, suitability, accuracy or completeness of the Information.

Any projections, estimates or forecasts included in the Information (a) shall not constitute a guarantee of future events, (b) may not consider or reflect all possible future events or conditions relevant to you (for example, market disruption events); and (c) may be based on assumptions or simplifications that may not be relevant to you.

The Information is provided 'as is' and 'as available'. To the fullest extent permitted by law, Legal & General accepts no liability to you or any other recipient of the Information for any loss, damage or cost arising from, or in connection with, any use or reliance on the Information. Without limiting the generality of the foregoing, Legal & General does not accept any liability for any indirect, special or consequential loss howsoever

caused and, on any theory, or liability, whether in contract or tort (including negligence) or otherwise, even if Legal & General has been advised of the possibility of such loss.

Third party data:

Where this document contains third party data ('Third Party Data'), we cannot guarantee the accuracy, completeness or reliability of such Third-Party Data and accept no responsibility or liability whatsoever in respect of such Third-Party Data.

Publication, amendments and updates:

We are under no obligation to update or amend the Information or correct any errors in the Information following the date it was delivered to you. Legal & General reserves the right to update this document and/or the Information at any time and without notice.

Although the Information contained in this document is believed to be correct as at the time of printing or publication, no assurance can be given to you that this document is complete or accurate in the light of information that may become available after its publication. The Information may not take into account any relevant events, facts or conditions that have occurred after the publication or printing of this document.

Telephone recording:

As required under applicable laws Legal & General will record all telephone and electronic communications and conversations with you that result or may result in the undertaking of transactions in financial instruments on your behalf. Such records will be kept for a period of five years (or up to seven years upon request from the Central Bank of Ireland (or such successor from time to time)) and will be provided to you upon request.

In the United Kingdom and outside the European Economic Area, it is issued by Legal & General Investment Management Limited, authorised and regulated by the Financial Conduct Authority, No. 119272. Registered in England and Wales No. 02091894 with registered office at One Coleman Street, London, EC2R 5AA.

In the European Economic Area, it is issued by LGIM Managers (Europe) Limited, authorised by the Central Bank of Ireland as a UCITS management company (pursuant to European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations, 2011 (S.I. No. 352 of 2011), as amended) and as an alternative investment fund manager with "top up" permissions which enable the firm to carry out certain additional MiFID investment services (pursuant to the European Union (Alternative Investment Fund Managers) Regulations 2013 (S.I. No. 257 of 2013), as amended). Registered in Ireland with the Companies Registration Office (No. 609677). Registered Office: 70 Sir John Rogerson's Quay, Dublin, 2, Ireland. Regulated by the Central Bank of Ireland (No. C173733).

LGIM Managers (Europe) Limited operates a branch network in the European Economic Area, which is subject to supervision by the Central Bank of Ireland. In Italy, the branch office of LGIM Managers (Europe) Limited is subject to limited supervision by the Commissione Nazionale per le società e la Borsa ("CONSOB") and is registered with Banca d'Italia (no. 23978.0) with registered office at Via Uberto Visconti di Modrone, 15, 20122 Milan, (Companies' Register no. MI - 2557936). In Germany, the branch office of LGIM Managers (Europe) Limited is subject to limited supervision by the German Federal Financial Supervisory Authority ("BaFin"). In the Netherlands, the branch office of LGIM Managers (Europe) Limited is subject to limited supervision by the Dutch Authority for the Financial Markets ("AFM") and it is included in the register held by the AFM and registered with the trade register of the Chamber of Commerce under number 74481231. Details about the full extent of our relevant authorisations and permissions are available from us upon request. For further information on our products (including the product prospectuses), please visit our website.

© 2021 Legal & General Investment Management Limited. All rights reserved. No part of this publication may be reproduced or transmitted in any form or by any means, including photocopying and recording, without the written permission of the publishers.