



Capital Gearing Portfolio Fund

Responsible Investment Report

Q4 2023

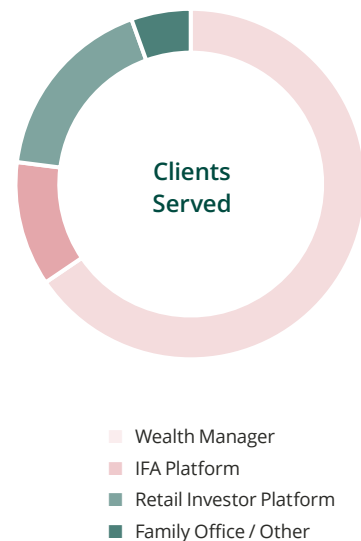
cgam

CG Asset Management

CGAM manages £4bn of investments on behalf of a wide range of clients, including wealth managers, independent financial advisors, private investors, family offices and charities. Wealth protection sits at the heart of everything we do.

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

For more information:
www.cgasset.com

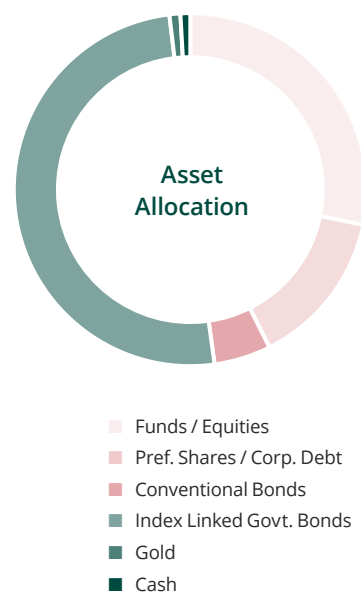


Capital Gearing Portfolio Fund

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







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

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



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

Responsible Investing Approach

	Questions our stakeholders ask	Page
Principles	 What are the guiding principles that underpin CGAM's approach to responsible investing?	4
Policies	 How are these principles interpreted in policy to steer firm activity?	5
Capabilities	 How does CGAM ensure it has the resources, skills and systems to implement its policies?	7
Integration	 How are CGAM's policies reflected in investment decision making?	9
Engagement	 How does CGAM engage with its portfolio investments?	12
Collaboration	 How does CGAM collaborate with third parties to amplify its impact?	14
Reporting	 How does CGAM ensure transparency and stakeholder confidence in our RI process?	15



Be honest

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

Ethics, not mathematics

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

Targeted

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

Integration, not separation

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

One firm, one rule

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

Engagement over disinvestment

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

Driven by governance

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

Act, with humility

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



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

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

Policy formation process

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

Stakeholder input into policy formation

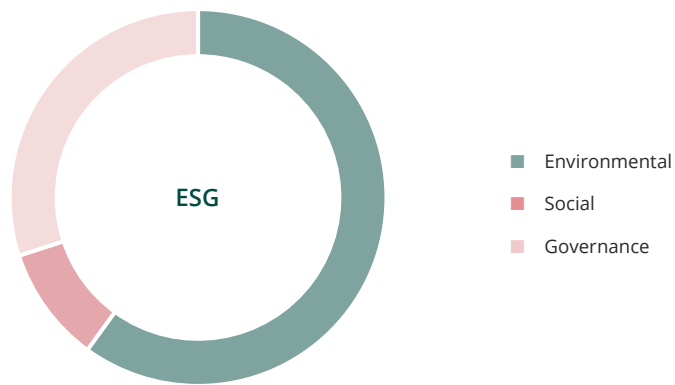
Stakeholder feedback is a central plank to our policy formation process. We use a variety of different channels to achieve stakeholder input.

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



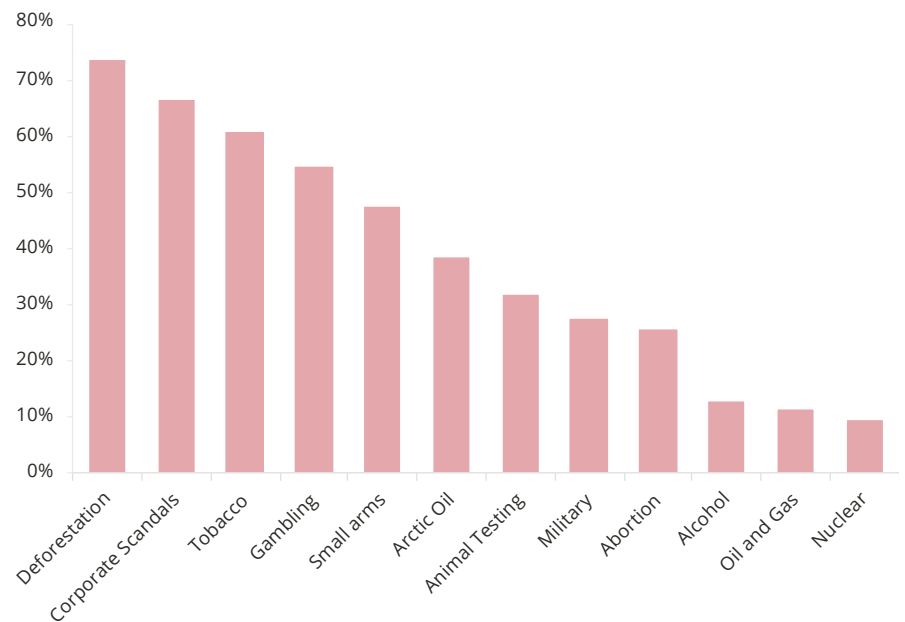
To understand the preferences of our self-directed private clients we primarily draw on investor surveys conducted by the platforms that those shareholders use. Anecdotal feedback from wealth managers suggests that the preferences of their own client base generally aligns with the self-directed private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

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



Source: Interactive Investor Survey

Share of investors unwilling to invest in:



Source: Hargreaves Lansdown ESG survey

Capabilities



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

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

Role	Participant	Team within CGAM
Chair	Alastair Laing	Chief Executive
Member	Emma Moriarty	Investment Team
Member	Richard Goody	Compliance
Secretary	Sindy Somanader	Finance & Reporting

Third parties

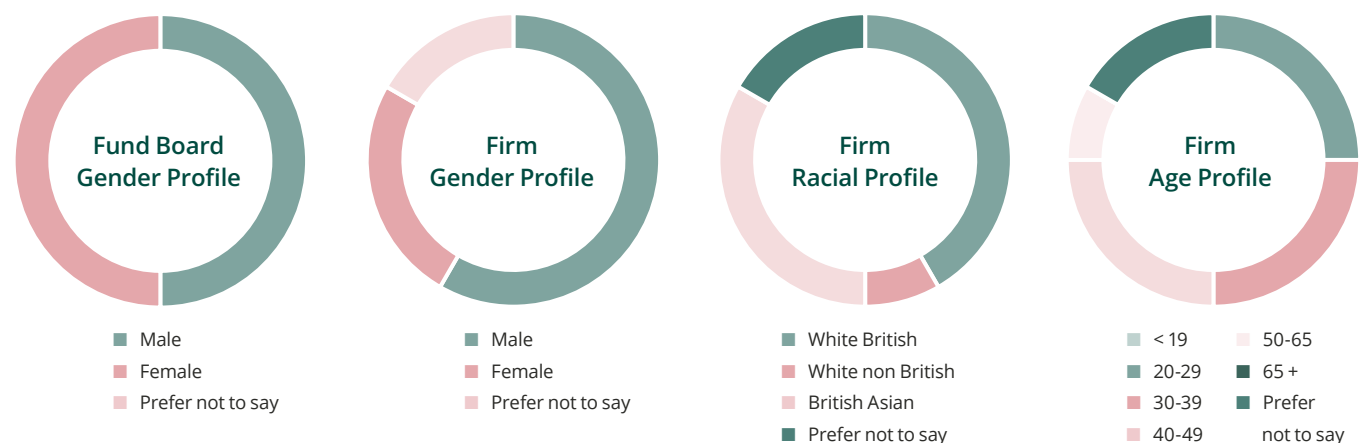
CGAM works with a variety of third parties to augment our inhouse RI work, including consultants and specialist data providers. For investment integration we have access to ESG data from Bloomberg, Morningstar (Sustainalytics), MSCI Ratings and S&P Global ESG.



We also work with a sustainability consultant, Sancroft, who provide advisory input into our RI processes.

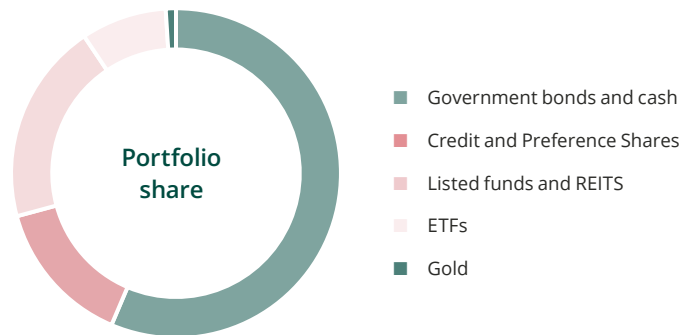
Diversity

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





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








Integration approach by asset class

Direct Government Securities

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

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

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



Direct Corporate Credit and Preference Shares

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

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

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

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

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

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

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



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

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

Exchange Traded Funds (“ETFs”)

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

Case study:

iShares MSCI Japan ESG screened ETF

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

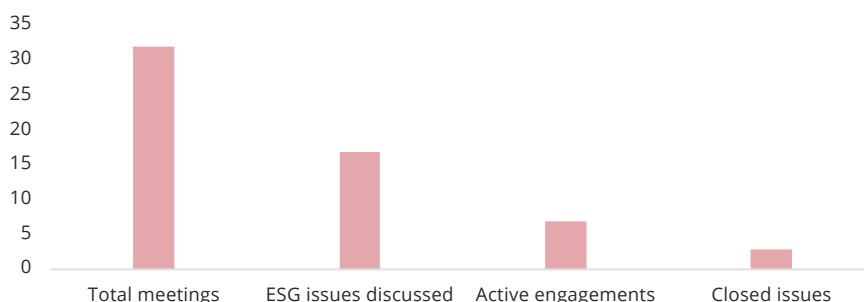


Engagement

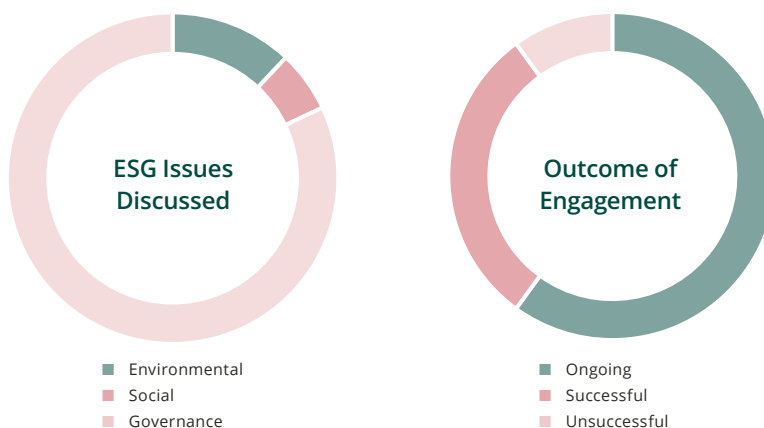
CGAM carried out a significant number of engagements in the quarter relating to securities held by Capital Gearing Portfolio Fund. Every meeting we hold with an investee company is an opportunity to raise ESG related points as part of our ongoing stewardship activities. We track all these interactions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

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

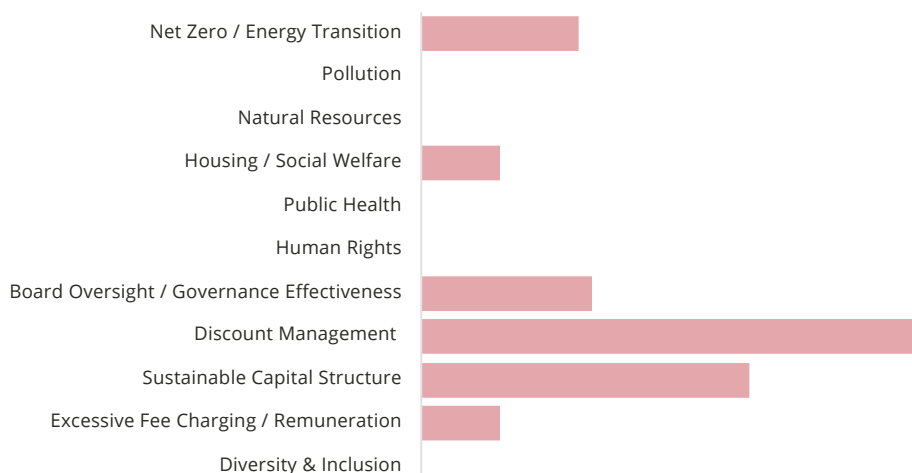
ESG Interactions Summary



ESG Issues Discussed



ESG Areas Raised (Detail)





Some examples of active engagements from the last quarter include

Company	Category	Summary
RM Infrastructure Income plc	Governance	RM Infrastructure Income plc is a London listed investment company which invests into debt securities mostly issued by property and infrastructure projects in the UK. The Company has not achieved sufficient scale to ensure it is sustainable and was considering a range of strategic options including merging with other companies. We engaged with the board to put forward our view that the best route for the company was to go into managed wind-down, returning capital to investors. The board ultimately agreed with our approach and shareholders voted to wind down the company in October 2024.
Digital 9 Infrastructure plc	Governance	Digital 9 Infrastructure plc is a London listed investment company with a portfolio of equity holdings of communications infrastructure companies. After raising excessive amounts of debt the company's financial position has deteriorated significantly over the last 18 months. We engaged extensively in the period holding seven meetings with other shareholders, the board and prospective new director candidates. One of the director candidates we promoted to the board is now a director and after a strategic review the whole company has been put into managed wind down with the intention of return capital to investors.
ICG-Longbow plc	Social / Governance	ICG-Longbow plc is a London listed investment company which invests into debt securities issued by property companies. After engaging with third parties who conducted a forensic investigation we became concerned about the conduct of the management team of one of the underlying investee companies to whom ICG-Longbow has lent money. After engaging with the manager and the board, ICG-Longbow has taken action including engaging a new management team for the troubled asset, taking steps to protect shareholder value and putting the asset up for sale.
Fidelity Japan Trust plc	Governance	Fidelity Japan Trust plc (FJV) is a London listed investment company that holds a portfolio of listed Japanese equities. The directors have made public commitments to keep the discount to NAV in single digits. We identified the directors were not keeping to this commitment, so we purchased shares in FJV and engaged with the board, manager and broker to encourage an increase in share buy-backs. FJV did increase the volume of buy backs resulting in a reduced discount level, at which point we materially exited our position.

Collaboration








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

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

	No. of examples in quarter
Direct collaborations	2
Indirect collaborations	0

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

We are signatories to or members of:

Network / Association	Summary
	<p>PRI is a United Nations supported international network of financial institutions working together to implement aspirational sustainability principles.</p>
	<p>The UN Global compact is a network of businesses that have adopted sustainable and social responsible policies, and report on their implementation.</p>
	<p>The AIC supports and promotes the long-term benefits of investment companies by engaging with members, investors and the wider financial community.</p>
	<p>The IA champions UK investment management to support savers, investors and businesses.</p>
	<p>Advance is a stewardship initiative where institutional investors work together to take action on human rights and social issues.</p>



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

Quarterly responsible investment reporting	By fund
Quarterly proxy voting record	By fund
Annual stewardship code reporting	Firmwide
Annual PRI reporting	Firmwide
Annual proxy voting record	Firmwide
Annual TCFD reporting	Firmwide

Voting

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

Total meetings voted	24
Meetings with at least one vote against	3
Meetings with at least one vote against management recommendations (%)	13%
Total votes cast in quarter	176

Co2 metrics

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

CGAM Scope 1 and 2 emissions quarterly	4.89 tCO ₂ e
CGAM scope 1 and 2 emissions annualised	19.57 tCO ₂ e

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

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