



PUBLIC TRANSPARENCY REPORT

2023

Lindsell Train Limited

Generated 15-12-2023

About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2023 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

Disclaimers

Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

Data accuracy

This document presents information reported directly by signatories in the 2023 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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SENIOR LEADERSHIP STATEMENT (SLS)

SENIOR LEADERSHIP STATEMENT

SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

Lindsell Train's rationale for engaging in responsible investment stems from our truly strategic investment time horizon. When we commit to an investment we intend to hold it for the very long term, which for us means several economic cycles. The resultant long-term partnerships that we build with investee companies form the cornerstone of our approach to responsible investment. This long-term investment horizon means we must be continually alert to all relevant long-term issues - including those related to environmental, social and governance factors (ESG) - with the objective of pre-empting risk and enhancing returns. So, although we will always invest to the top priority of protecting the real value of the capital entrusted to us, we are clear that there is no contradiction between this priority and the good behaviour of the companies we invest in.

Lindsell Train focuses on a small number of equity strategies using a single investment approach, implemented by one investment team. We believe we can best serve clients through the application of an integrated approach, where our investment team incorporate ESG considerations to make better decisions. Embedded in our approach is a belief that companies which observe such standards, and that are serious in their intention of addressing ESG factors, will not only become more durable, but will likely prove to be superior investments over time.

As a product of our investment philosophy, we do not invest in capital intensive industries (e.g. energy, commodities or mining) or any companies involved in the extraction and production of coal, oil or natural gas; or industries that we judge to be sufficiently detrimental to society that they may be exposed to burdensome regulation or litigation that could impinge on financial returns (e.g. tobacco, gambling or arms manufacturers). Similarly, our approach has steered us to invest in a number of companies that play an important positive societal role.

From a research perspective, our initial analysis of a company and ongoing engagement seek to incorporate all sustainability factors that we believe will affect the company's ability to deliver long-term value to shareholders. If we believe that an ESG factor is likely to impact a company's long-term business prospects (either positively or negatively) then we can reflect this in the long-term growth rate that we apply in our valuation of that company, which alongside our more qualitative research will influence any final portfolio decisions. Additionally, where we identify significant negative impacts we are willing to use engagement and our voting rights to encourage and influence companies to adapt their business strategies.

We own fewer companies and hold them for longer than most other investors so are able to give more consideration to all the factors that make up our assessment of sustainability.

We come to our own judgements on sustainability rather than outsourcing the responsibility to third party ratings agencies.

In terms of responsible investment commitments, Lindsell Train is:

- a signatory of the PRI
- a signatory of the 2020 UK Stewardship Code
- a signatory of the Japan Stewardship Code
- a public supporter of TCFD
- a User Member of IFRS Sustainability Alliance
- a signatory of NZAM
- a signatory of Find It, Fix It, Prevent It.

Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
 - refinement of ESG analysis and incorporation
 - stewardship activities with investees and/or with policymakers
 - collaborative engagements
 - attainment of responsible investment certifications and/or awards

There was much activity in the area of ESG during 2022 and it was yet another year of solid progress in our ESG endeavours. The ESG Committee is now firmly embedded in our governance structure and has been instrumental in ensuring that we remain abreast of regulation, continue to meet our clients' expectations and that we propel discussions to influence the work and ambitions of our portfolio companies. In particular, we would note the following key milestones:

- Reflecting the increased importance we place on the investment team's ESG research and engagement activities, Madeline Wright, in addition to her Deputy Portfolio Manager role, was appointed as Head of Investment ESG, responsible for coordinating the investment team's ESG work.

This is an important additional role given that we have deliberately chosen not to set up a separate ESG function, reflecting our view that ESG is integral to the research process and that all members of the investment team are therefore responsible for its inclusion in their work.

- We pledged our net zero targets under the leadership of the Net Zero Asset Managers initiative (NZAM). We believe that the risks associated with climate change and the transition to a low-carbon economy will affect all businesses, irrespective of their size, sector or geographic location.

Therefore, no company's revenues are immune and the assessment of such risks must be considered within any effective investment approach, particularly one like ours that seeks to protect our clients' capital for decades to come. In accordance with NZAM, in 2022 we established and disclosed our 2030 interim target, in line with the Paris Aligned Investment Initiative (PAII) Net Zero Investment Framework. In recognition of Lindsell Train's investment approach we believe it most appropriate to adopt a portfolio coverage target which seeks to increase the proportion of a manager's AUM aligning to a Net Zero pathway, driven mainly by targeted engagement with management, as opposed to divestment.

- Demonstrating our public support of TCFD and its efforts to encourage companies to report their climate-related disclosures and data in a uniform and consistent way, Lindsell Train published its inaugural TCFD report in March 2022.

We believe the TCFD framework offers a practical way of outlining our approach to integrating climate-related risk and opportunities. Furthermore, if we are exploring the behaviours of our portfolio companies in relation to climate change then we must also think about ours.

- The investment team concluded a large-scale project to hold an ESG specific discussion with every company in our portfolios (70 in total) in order to establish a baseline for our ongoing engagement work.

- We confirmed our support of CCLA-founded initiative Find It, Fix It, Prevent It, which is exclusively focussed on the abolition of modern slavery. As investors in several consumer goods companies, we are particularly alert to modern slavery in the supply chain and the business risks it poses. Working with CCLA and other signatories, we will continue to collaborate for change, by encouraging all our companies to proactively identify and address any incidences of modern slavery in their supply chains.

More generally, whilst we believe that our commitment to Responsible Investing through the long-term partnerships with our portfolio companies is well understood and endorsed by our clients, we have continued to dedicate significant time and resource to establishing a more robust approach to active ownership, including enhanced ESG integration, engagement and proxy voting. As a result of these efforts, we have improved existing policies, reviewed and responded to upcoming regulation, reflected on the appropriateness of our governance structures and worked with our clients and consultant partners to understand how we can serve their best interests.

Though we have made substantial progress, there are still areas for improvement. For example our ongoing project to further formalise our engagement framework, including our escalation process.

Section 3. Next steps

- What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

The ESG committee has identified the following initiatives as priorities for 2022/2023:

1. As signatories of the Net Zero Asset Managers initiative (NZAM) we have set a target to be net zero across the assets under our management by 2050. We have also published an interim (2030) target and in recognition of Lindsell Train's investment approach we believe it most appropriate to adopt a portfolio coverage target, which seeks to increase the proportion of a manager's AUM aligning to a Net Zero pathway. The portfolio coverage target Lindsell Train has set has an objective of increasing the percentage of our AUM achieving aligned status from 36% in August 2022 (baseline) to 55% in 2030.
To achieve this, we will continue to engage proactively with the management of companies we hold across our portfolios, our aim being to understand their individual goals and, where appropriate, to provide our thoughts on their road maps, with the overall ambition of reaching an absolute reduction in global carbon emissions.
2. Having completed a large-scale project to hold an ESG specific discussion with every company in our portfolios (70 companies) to establish a baseline for our ongoing engagement, the ESG Committee is now agreeing a formal engagement framework to guide our future engagement activities. The framework will identify priority topics, as well as enable more structured monitoring and reporting on our objectives and outcomes.

Section 4. Endorsement

'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.

Name

Nick Train

Position

Chairman

Organisation's Name

A

'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.

B

ORGANISATIONAL OVERVIEW (OO)

ORGANISATIONAL INFORMATION

REPORTING YEAR

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2022

SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries?

(A) Yes

(B) No

ASSETS UNDER MANAGEMENT

ALL ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 3	CORE	Provisional signatory	OO 4, OO 5, OO 32	PUBLIC	All asset classes	GENERAL

During the reporting year, was your organisation exclusively in the fundraising process and unable to report an assets under management (AUM) figure?

- (A) Yes, we were in the fundraising process and unable to report an AUM figure for the reporting year
- (B) No, we completed our fundraising and are able to report an AUM figure for the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 3	N/A	PUBLIC	All asset classes	GENERAL

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 21,956,866,235.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 0.00

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 0.00

ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	100%	0%
(B) Fixed income	0%	0%
(C) Private equity	0%	0%
(D) Real estate	0%	0%
(E) Infrastructure	0%	0%
(F) Hedge funds	0%	0%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	0%	0%
(J) Off-balance sheet	0%	0%

ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 LE	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed listed equity	GENERAL

Provide a further breakdown of your internally managed listed equity AUM.

(A) Passive equity 0%

(B) Active – quantitative 0%

(C) Active – fundamental 100%

(D) Other strategies 0%

GEOGRAPHICAL BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

AUM in Emerging Markets and Developing Economies

(A) Listed equity (1) 0%

STEWARDSHIP

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

(1) Listed equity - active

(A) Yes, through internal staff	<input checked="" type="checkbox"/>
(B) Yes, through service providers	<input type="checkbox"/>
(C) Yes, through external managers	<input type="checkbox"/>
(D) We do not conduct stewardship	<input type="radio"/>

STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?

(1) Listed equity - active

(A) Yes, through internal staff	<input checked="" type="checkbox"/>
(B) Yes, through service providers	<input type="checkbox"/>
(C) Yes, through external managers	<input type="checkbox"/>
(D) We do not conduct (proxy) voting	<input type="radio"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9.1	CORE	OO 9	PGS 10.1, PGS 31	PUBLIC	Stewardship: (Proxy) voting	GENERAL

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

Percentage of your listed equity holdings over which you have the discretion to vote

(A) Listed equity – active (11) >90 to <100%

ESG INCORPORATION

INTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

For each internally managed asset class, does your organisation incorporate ESG factors into your investment decisions?

(1) Yes, we incorporate ESG factors into our investment decisions

(2) No, we do not incorporate ESG factors into our investment decisions

(C) Listed equity - active - fundamental



ESG STRATEGIES

LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 LE	CORE	OO 11	OO 17.1 LE, LE 12	PUBLIC	Listed equity	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active listed equity?

Percentage out of total internally managed active listed equity

(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	100%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	0%
(H) None	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 LE	CORE	OO 17 LE	LE 9	PUBLIC	Listed equity	1

What type of screening does your organisation use for your internally managed active listed equity assets where a screening approach is applied?

Percentage coverage out of your total listed equity assets where a screening approach is applied

(A) Positive/best-in-class screening only	0%
(B) Negative screening only	0%
(C) A combination of screening approaches	100%

ESG/SUSTAINABILITY FUNDS AND PRODUCTS

LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

- (A) Yes, we market products and/or funds as ESG and/or sustainable
- (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- (C) Not applicable; we do not offer products or funds

Additional information: (Voluntary)

To date we have not marketed our products or funds as ESG/sustainable as we continue to evaluate the expectations of clients and regulators regarding the investment characteristics that define such labels, particularly in light of the accusations of greenwashing within the industry.

SUMMARY OF REPORTING REQUIREMENTS

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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Confidence Building Measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(C) Listed equity – active – fundamental	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

SUBMISSION INFORMATION

REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- (A) Publish as absolute numbers
- (B) Publish as ranges

POLICY, GOVERNANCE AND STRATEGY (PGS)

POLICY

RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

- (A) Overall approach to responsible investment
- (B) Guidelines on environmental factors
- (C) Guidelines on social factors
- (D) Guidelines on governance factors
- (E) Guidelines on sustainability outcomes
- (F) Guidelines tailored to the specific asset class(es) we hold
- (G) Guidelines on exclusions
- (H) Guidelines on managing conflicts of interest related to responsible investment
- (I) Stewardship: Guidelines on engagement with investees
- (J) Stewardship: Guidelines on overall political engagement
- (K) Stewardship: Guidelines on engagement with other key stakeholders
- (L) Stewardship: Guidelines on (proxy) voting
- (M) Other responsible investment elements not listed here
 - (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- (C) Specific guidelines on other systematic sustainability issues
- (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

Which elements of your formal responsible investment policy(ies) are publicly available?

(A) Overall approach to responsible investment

Add link:

https://www.lindselltrain.com/application/files/2416/4362/2655/Lindsell_Train_Responsible_Investment_Engagement_Policy_-_September_2021.pdf

(B) Guidelines on environmental factors

Add link:

https://www.lindselltrain.com/application/files/2416/4362/2655/Lindsell_Train_Responsible_Investment_Engagement_Policy_-_September_2021.pdf

(C) Guidelines on social factors

Add link:

https://www.lindselltrain.com/application/files/2416/4362/2655/Lindsell_Train_Responsible_Investment_Engagement_Policy_-_September_2021.pdf

(D) Guidelines on governance factors

Add link:

https://www.lindselltrain.com/application/files/2416/4362/2655/Lindsell_Train_Responsible_Investment_Engagement_Policy_-_September_2021.pdf

(E) Guidelines on sustainability outcomes

Add link:

https://www.lindselltrain.com/application/files/2416/4362/2655/Lindsell_Train_Responsible_Investment_Engagement_Policy_-_September_2021.pdf

(F) Specific guidelines on climate change (may be part of guidelines on environmental factors)

Add link:

https://www.lindselltrain.com/application/files/2416/4362/2655/Lindsell_Train_Responsible_Investment_Engagement_Policy_-_September_2021.pdf

(J) Guidelines on exclusions

Add link:

https://www.lindselltrain.com/application/files/2416/4362/2655/Lindsell_Train_Responsible_Investment_Engagement_Policy_-_September_2021.pdf

(K) Guidelines on managing conflicts of interest related to responsible investment

Add link:

https://www.lindselltrain.com/application/files/2416/4362/2655/Lindsell_Train_Responsible_Investment_Engagement_Policy_-_September_2021.pdf

(L) Stewardship: Guidelines on engagement with investees

Add link:

https://www.lindselltrain.com/application/files/2416/4362/2655/Lindsell_Train_Responsible_Investment_Engagement_Policy_-_September_2021.pdf

(O) Stewardship: Guidelines on (proxy) voting

Add link:

https://www.lindselltrain.com/application/files/2416/4362/2655/Lindsell_Train_Responsible_Investment_Engagement_Policy_-_September_2021.pdf

- (Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 4	PLUS	PGS 1	N/A	PUBLIC	Responsible investment policy elements	1 – 6

Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?

(A) Yes

Elaborate:

We will always endeavour to act in the best interests of our clients as stewards of their capital and our primary aim is to protect and grow the real value of our clients' capital over the long term. To achieve this aim, Lindsell Train invests in what we have determined to be "exceptional" companies with the expectation of holding them for the very long term. Our truly strategic time horizon means we must be continually alert to all relevant long-term issues, with the objective of pre-empting risk and enhancing returns. Considering all ESG factors which might affect our companies has therefore always been central to our investment approach.

- (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Which elements are covered in your organisation’s policy(ies) or guidelines on stewardship?

- (A) Overall stewardship objectives
- (B) Prioritisation of specific ESG factors to be advanced via stewardship activities
- (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- (D) How different stewardship tools and activities are used across the organisation
- (E) Approach to escalation in stewardship
- (F) Approach to collaboration in stewardship
- (G) Conflicts of interest related to stewardship
- (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- (I) Other
- (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 6	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Does your policy on (proxy) voting include voting principles and/or guidelines on specific ESG factors?

- (A) Yes, it includes voting principles and/or guidelines on specific environmental factors
- (B) Yes, it includes voting principles and/or guidelines on specific social factors
- (C) Yes, it includes voting principles and/or guidelines on specific governance factors
- (D) Our policy on (proxy) voting does not include voting principles or guidelines on specific ESG factors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 7	CORE	OO 9	N/A	PUBLIC	Responsible investment policy elements	2

Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

- (A) We have a publicly available policy to address (proxy) voting in our securities lending programme
- (B) We have a policy to address (proxy) voting in our securities lending programme, but it is not publicly available
- (C) We rely on the policy of our external service provider(s)
- (D) We do not have a policy to address (proxy) voting in our securities lending programme
- (E) Not applicable; we do not have a securities lending programme

RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

Combined AUM coverage of all policy elements

(A) Overall approach to responsible investment

(B) Guidelines on environmental factors

(C) Guidelines on social factors

(D) Guidelines on governance factors

(7) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 9	CORE	PGS 2	N/A	PUBLIC	Responsible investment policy coverage	1

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

AUM coverage

(A) Specific guidelines on climate change

(1) for all of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

(A) Listed equity

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10.1	CORE	OO 9.1, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

What percentage of your listed equity holdings is covered by your guidelines on (proxy) voting?

(A) Actively managed listed equity

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

GOVERNANCE

ROLES AND RESPONSIBILITIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

- (A) Board members, trustees, or equivalent
- (B) Senior executive-level staff, or equivalent

Specify:

Lindsell Train's board of directors has delegated accountability for responsible investment to the ESG Committee, whose Terms of Reference are approved by the board. The Chair of the Lindsell Train board is also Chair of the ESG Committee. Further oversight of all risk and compliance matters including those relating to ESG is provided by our Risk and Compliance Committee, which is chaired by one of our independent non-executive directors, and includes our CCO and COO in membership.

- (C) Investment committee, or equivalent
- (D) Head of department, or equivalent
- (E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

(1) Board members, trustees, or equivalent

(2) Senior executive-level staff, investment committee, head of department, or equivalent

(A) Overall approach to responsible investment

(B) Guidelines on environmental, social and/or governance factors

(C) Guidelines on sustainability outcomes	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(H) Guidelines on exclusions	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(I) Guidelines on managing conflicts of interest related to responsible investment	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Stewardship: Guidelines on engagement with investees	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(M) Stewardship: Guidelines on (proxy) voting	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)	<input type="radio"/>	<input type="radio"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1 – 6

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

- (A) Yes
- (B) No
- (C) **Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

(A) Internal role(s)

Specify:

Investment Team, ESG Committee members, Chief Compliance Officer, Marketing & Client Service Team

(B) External investment managers, service providers, or other external partners or suppliers

(C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?

(A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

(B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Explain why: (Voluntary)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?

(A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

● (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Explain why: (Voluntary)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 15	PLUS	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?

	(1) Board members, trustees or equivalent	(2) Senior executive-level staff, investment committee, head of department or equivalent
(A) Specific competence in climate change mitigation and adaptation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Specific competence in investors' responsibility to respect human rights	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Specific competence in other systematic sustainability issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies	<input type="checkbox"/>	<input type="checkbox"/>

EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

- (A) Any changes in policies related to responsible investment
- (B) Any changes in governance or oversight related to responsible investment
- (C) Stewardship-related commitments
- (D) Progress towards stewardship-related commitments
- (E) Climate-related commitments
- (F) Progress towards climate-related commitments
- (G) Human rights-related commitments
- (H) Progress towards human rights-related commitments
- (I) Commitments to other systematic sustainability issues
- (J) Progress towards commitments on other systematic sustainability issues
- (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

- (A) Yes, including all governance-related recommended disclosures
- (B) Yes, including all strategy-related recommended disclosures
- (C) Yes, including all risk management-related recommended disclosures
- (D) Yes, including all applicable metrics and targets-related recommended disclosures
- (E) None of the above

Add link(s):

https://www.lindselltrain.com/application/files/5816/8069/2997/LindsellTrain_TCFD_Report_2023_Final.pdf

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 18	PLUS	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, to which international responsible investment standards, frameworks, or regulations did your organisation report?

(A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR)

Link to example of public disclosures

https://www.lindselltrain.com/protected_file/MjM3LTc1Ng%3D%3D

(B) Disclosures against the European Union's Taxonomy

(C) Disclosures against the CFA's ESG Disclosures Standard

(D) Disclosures against other international standards, frameworks or regulations

Specify:

Lindsell Train is a signatory of the UK Stewardship Code 2020 and we produce an Annual Stewardship Report each year that is published to our website.

Link to example of public disclosures

https://www.lindselltrain.com/application/files/2916/8563/5412/LindsellTrain_Annual-Stewardship_Report_2023.pdf

(E) Disclosures against other international standards, frameworks or regulations

Specify:

TCFD report

Link to example of public disclosures

https://www.lindselltrain.com/application/files/5816/8069/2997/LindsellTrain_TCFD_Report_2023_Final.pdf

(F) Disclosures against other international standards, frameworks or regulations

(G) Disclosures against other international standards, frameworks or regulations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

(A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

Add link(s):

- (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- (C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

STRATEGY

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

Which elements do your organisation-level exclusions cover?

- (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services
- (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- (D) Exclusions based on our organisation's climate change commitments
- (E) Other elements
- (F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

How does your responsible investment approach influence your strategic asset allocation process?

- (A) We incorporate ESG factors into our assessment of expected asset class risks and returns
- (B) We incorporate climate change–related risks and opportunities into our assessment of expected asset class risks and returns
- (C) We incorporate human rights–related risks and opportunities into our assessment of expected asset class risks and returns
- (D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns
- (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- (F) Not applicable; we do not have a strategic asset allocation process

STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

(1) Listed equity

(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.

(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 23	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?

Given the concentrated nature of our portfolios (20-30 stocks) and the fact that all positions are sizeable and meaningful, all engagement activities are considered a priority. The investment team see it as a critical part of their company research to dedicate appropriate attention to any engagement activity and during 2022 we addressed with each portfolio company's management all ESG concerns that we viewed as most relevant to that holding. These conversations enabled us to establish a baseline for each company for our ongoing engagement work.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

- (A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible
- (B) We collaborate on a case-by-case basis
- (C) Other
- (D) We do not join collaborative stewardship efforts

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24.1	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Elaborate on your organisation's default position on collaborative stewardship, or the position of the external service providers or external investment managers acting on your behalf, including any other details on your overall approach to collaboration.

Whilst it is our preference to engage with management privately, as this enables us to build a more effective relationship with boards and management, we recognise that collaboration and unified influence quicken progress. As such, we will consider bilateral conversations with other likeminded investors, or in some cases our clients, to confirm alignment of shareholder interest, or better understand why and where this isn't the case. Outside of specific company engagement, we attend relevant conferences and also engage with policymakers where appropriate.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 25	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Rank the channels that are most important for your organisation in achieving its stewardship objectives.

(A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff

Select from the list:

- 1
- 4
- 5

(B) External investment managers, third-party operators and/or external property managers, if applicable

(C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers

Select from the list:

- 2
- 4
- 5

(D) Informal or unstructured collaborations with investors or other entities

Select from the list:

- 3
- 4
- 5

(E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar

(F) We do not use any of these channels

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 27	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How are your organisation’s stewardship activities linked to your investment decision making, and vice versa?

Lindsell Train has a single investment approach which is implemented across all our strategies (and hence funds and geographies) by one investment team. All seven members contribute to the research process. We do not separate out research from portfolio management. Moreover, we think it is important that all members of the team are generalists to encourage as broad a range of market, industry and company knowledge as possible. The process is iterative in nature and all research is reviewed and debated as a team. Embedded in this approach is our evaluation of ESG factors, including climate change, as it is our view that we can best serve clients through the application of an integrated approach, where our investment team leverage ESG considerations to make better decisions.

Our investment philosophy is not driven by ESG but in our search for ‘exceptional’ companies (that is durable, cash generative businesses that achieve higher than average returns on capital) we take into account a wide range of factors, including ESG. The ‘exceptional’ companies that Lindsell Train seeks to invest in are rare.

Furthermore, we expect to hold these companies for the very long term, which for us means several stock market or economic cycles. As such, our investment process places significant emphasis on heritage and sustainability, and our evaluation of ESG factors is a natural part of our investment process and is incorporated into our framework at the earliest stage of idea generation and continues throughout the ongoing research/monitoring of companies, including company engagement.

Engaging with and monitoring portfolio companies is an essential element of our investment strategy. The investment team's ongoing monitoring includes reviewing annual reports and accounts, together with other publicly available information, and meeting with company management, when appropriate, on an ongoing basis.

The team evaluate the effectiveness of a company's management and poor business practices would be reflected in our overall assessment of the company. Given the concentrated nature of our portfolios (20-30 stocks) and the fact that all positions are sizeable and meaningful, all engagement activities are considered a priority. The investment team see it as a critical part of their company research to dedicate appropriate attention to any engagement activity and during 2022 we addressed with each portfolio company's management all ESG concerns that we viewed as most relevant to that holding.

Our long-term approach generally leads us to be supportive of company management; however, where required and if in the best interests of our clients, we will try to influence management on specific matters or policies.

Our intention is to have open and constructive dialogue with management and board members, in order to broaden our knowledge of the company's strategy and operations and to ensure any concerns we might have are assuaged. Given we often build up large, long-term, stakes in the businesses in which we invest we find that management are open to (and very often encourage) engaging with Lindsell Train. Constructive dialogue has more often than not resulted in satisfactory outcomes, thus limiting the need for escalation. However, where this is not the case, we will consider escalating our engagement and stewardship activities.

STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 29	CORE	OO 9, PGS 1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

When you use external service providers to give recommendations, how do you ensure those recommendations are consistent with your organisation's (proxy) voting policy?

- (A) Before voting is executed, we review external service providers' voting recommendations for controversial and high-profile votes
- (B) Before voting is executed, we review external service providers' voting recommendations where the application of our voting policy is unclear
- (C) We ensure consistency with our voting policy by reviewing external service providers' voting recommendations only after voting has been executed
- (D) We do not review external service providers' voting recommendations
- (E) Not applicable; we do not use external service providers to give voting recommendations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 30	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How is voting addressed in your securities lending programme?

- (A) We recall all securities for voting on all ballot items
- (B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our securities for voting
- (C) Other
- (D) We do not recall our securities for voting purposes
- (E) Not applicable; we do not have a securities lending programme

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 31	CORE	OO 9.1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

For the majority of votes cast over which you have discretion to vote, which of the following best describes your decision making approach regarding shareholder resolutions (or that of your external service provider(s) if decision making is delegated to them)?

- (A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment
- (B) We vote in favour of resolutions expected to advance progress on our stewardship priorities, but only if the investee company has not already publicly committed to the action(s) requested in the proposal
- (C) We vote in favour of shareholder resolutions only as an escalation measure
- (D) We vote in favour of the investee company management's recommendations by default
- (E) Not applicable; we do not vote on shareholder resolutions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 32	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

During the reporting year, how did your organisation, or your external service provider(s), pre-declare voting intentions prior to voting in annual general meetings (AGMs) or extraordinary general meetings (EGMs)?

- (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database
- (B) We pre-declared our voting intentions publicly by other means, e.g. through our website
- (C) We privately communicated our voting decision to investee companies prior to the AGM/EGM
- (D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM
- (E) Not applicable; we did not cast any (proxy) votes during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33	CORE	OO 9	PGS 33.1	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, do you publicly disclose your (proxy) voting decisions or those made on your behalf by your external service provider(s), company by company and in a central source?

(A) Yes, for all (proxy) votes

Add link(s):

https://www.lindselltrain.com/application/files/1816/7406/1046/Proxy_Voting_Report_2022_-_FINAL.pdf

- (B) Yes, for the majority of (proxy) votes
- (C) Yes, for a minority of (proxy) votes
- (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33.1	CORE	PGS 33	N/A	PUBLIC	Stewardship: (Proxy) voting	2

In the majority of cases, how soon after an investee's annual general meeting (AGM) or extraordinary general meeting (EGM) do you publish your voting decisions?

- (A) Within one month of the AGM/EGM
- (B) Within three months of the AGM/EGM
- (C) Within six months of the AGM/EGM
- (D) Within one year of the AGM/EGM
- (E) More than one year after the AGM/EGM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 34	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, did your organisation, and/or the external service provider(s) acting on your behalf, communicate the rationale for your voting decisions during the reporting year?

(1) In cases where we abstained or voted against management recommendations

(2) In cases where we voted against an ESG-related shareholder resolution

(A) Yes, we publicly disclosed the rationale	(1) for all votes	
(B) Yes, we privately communicated the rationale to the company	(1) for all votes	
(C) We did not publicly or privately communicate the rationale, or we did not track this information	<input type="radio"/>	<input checked="" type="radio"/>
(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year	<input type="radio"/>	<input type="radio"/>

(A) Yes, we publicly disclosed the rationale - Add link(s):

https://www.lindselltrain.com/application/files/1816/7406/1046/Proxy_Voting_Report_2022_-_FINAL.pdf

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 35	PLUS	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How does your organisation ensure vote confirmation, i.e. that your votes have been cast and counted correctly?

Lindsell Train's Portfolio Managers are responsible for proxy voting decisions and it is our policy to exercise all voting rights which have been delegated to us by our clients. Proxy voting decisions are the result of careful judgement in order to ensure the best possible outcome to generate long-term shareholder value. The manager will vote against any agenda that threatens this position, in particular concerns over inappropriate management incentives, changes in capital structure and mergers or acquisitions which are seen as detrimental to the investment held. Where we plan to abstain or to vote against a company backed resolution, our intentions will be communicated to the company management in advance of voting.

Bureaucracy is mitigated by virtue of the small number of companies in which we invest (around 70 in total across all portfolios), the clear lines of responsibility for each part of the voting process and the use of a voting platform as described below.

Lindsell Train has appointed Glass Lewis to aid in the administration of proxy voting and to ensure the integrity of our voting process. The Glass Lewis Viewpoint platform has streamlined and digitalised the overall voting and confirmation process.

The Viewpoint platform enables Lindsell Train to monitor what shares and voting rights we have and also provides the necessary alerts ahead of voting deadlines. The investment team accesses the platform to review all votes, taking into consideration any ongoing or past engagement activity. On the rare occasion that a vote is missed, late or rejected, we have policies and procedures in place to ensure each incident is investigated and the appropriate remedial action is taken.

STEWARDSHIP: ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 36	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Escalation	2

For your listed equity holdings, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

(1) Listed equity

- | | |
|---|-------------------------------------|
| (A) Joining or broadening an existing collaborative engagement or creating a new one | <input checked="" type="checkbox"/> |
| (B) Filing, co-filing, and/or submitting a shareholder resolution or proposal | <input type="checkbox"/> |
| (C) Publicly engaging the entity, e.g. signing an open letter | <input type="checkbox"/> |
| (D) Voting against the re-election of one or more board directors | <input type="checkbox"/> |
| (E) Voting against the chair of the board of directors, or equivalent, e.g. lead independent director | <input type="checkbox"/> |

(F) Divesting

(G) Litigation

(H) Other

(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings

(H) Other - (1) Listed equity - Specify:

Written to the company's executive management to express our views and concerns

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

- (A) Yes, we engaged with policy makers directly
- (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI
- (C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI**
- (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

- (A) We participated in 'sign-on' letters
- (B) We responded to policy consultations
- (C) We provided technical input via government- or regulator-backed working groups
- (D) We engaged policy makers on our own initiative
- (E) Other methods**

Describe:

Lindsell Train became signatories to the Find it, Fix it, Prevent it initiative in 2022. Developed by CCLA and supported by a partnership of investor bodies, academics and non-governmental organisations, it is designed to harness the power of the investment community. The overarching aim is to make the corporate response to modern slavery more effective. The programme has three complementary workstreams; 1) Public Policy - to promote a meaningful regulatory environment through work with the government and home office; 2) Corporate engagement, and 3) Developing better data.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

- (A) We publicly disclosed all our policy positions
- (B) We publicly disclosed details of our engagements with policy makers**

Add link(s):

https://www.lindselltrain.com/application/files/9416/7336/2913/2022_ESG__Engagement_report_-_FINAL.pdf

- (C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

STEWARDSHIP: EXAMPLES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 40	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Examples	2

Provide examples of stewardship activities that you conducted individually or collaboratively during the reporting year that contributed to desired changes in the investees, policy makers or other entities with which you interacted.

(A) Example 1:
Title of stewardship activity:

Social - Human and Labour Rights
Burberry and Youngs

(1) Led by

- (1) Internally led**
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) **Social factors**
- (3) Governance factors

(3) Asset class(es)

- (1) **Listed equity**
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

LTL became signatories of Find It, Fix It, Prevent It, in Q2 2022. This initiative convened and resourced by CCLA and overseen by an Advisory Committee, brings together investors, academics and non-governmental organisations to share knowledge, set targets and monitor the progress of its initiative to eradicate modern slavery.

We had already engaged with a number of our portfolio companies on this topic, particularly, in the aftermath of the 2020 Boohoo scandal involving slave labour in its supply chain.

At that time we engaged with the chairman of Burberry and we were assured that the prevention of such issues is a priority, and that Burberry maintains tight control on its supply chain both from an ethical and a quality standpoint. Later in 2020, we also engaged with Burberry investor relations with regards to the Xinjiang cotton scandal. We were assured that Burberry sources no cotton whatsoever from this region, and indeed is a signatory to the Better Cotton Initiative.

In Q3 2022 we engaged with both Young's and Burberry, putting what we felt to be illuminating questions about modern slavery from Find it, Fix it, Prevent it to both companies.

Both Young's and Burberry already have formal Modern Slavery policies in place.

Burberry acknowledged that modern slavery has been found in its supply chain but expects this would be the case for any company should it delve deep enough. The company was understandably discreet about the details of detection and remediation but reassured us that its policies are robust and always supported by NGO input, and that it is indeed incumbent on Burberry to report that slavery was found and describe how it was fixed.

So far Young's has not found modern slavery in its supply chain, but revealed that the areas of greatest risk are the use of agencies to supply workers (although these comprise <5% of all staff), and employees working without the correct documentation. The former issue will hopefully be phased out as Young's turns away from contracted staff and the latter is being addressed with a well established checking process and a full yearly HR audit.

In response to the Modern Slavery Act's recommendations becoming mandatory, the company is beefing up its due diligence, e.g. requiring suppliers to register on the Sedex platform which allows for supply chain transparency and the identification of risk areas. Most big suppliers are already on Sedex, and overall the aim is to get 100% of suppliers and agencies onto the platform.

Following our engagement we came away reassured by the emphasis both companies place on the issue and the resources they continue to devote to the challenge.

(B) Example 2:

Title of stewardship activity:

Social - Human and Labour Rights
Kirin

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Lindsell Train had been engaging with the management and advisory board of Kirin Holdings since the beginning of 2020 regarding their brewery venture in Myanmar (Myanmar Brewery) arranged as a joint venture with the Myanmar Economic Holdings Public Company Limited (MEH). MEH has been accused by Amnesty International and the UN of using the proceeds of this joint venture to finance a military that has been associated with human rights abuses, particularly against the Rohingya people.

We proactively engaged with Kirin management on the joint venture over two years to encourage the finding of a solution.

Earlier in 2022, Kirin announced that it would be exiting completely from Myanmar and the joint venture with MEH.

Prior to this decision, Kirin had engaged in multiple discussions with MEH (via an arbitration process in Singapore) in an attempt to persuade them to exit the JV and leave Kirin as the sole operator in Myanmar, but this proved fruitless and was taking too long. Kirin had also sought an outside buyer for its stake in Myanmar Brewery, but this too failed to come to fruition. Kirin will instead sell its entire 51% stake in the joint venture back to Myanmar Brewery, structured as a share buyback.

From a financial perspective, by engineering a sale rather than a straight liquidation, Kirin has recovered some of its initial investment.

Additionally, with the reversal of some of the initial impairment losses the company had already recognised, the impact on profitability is somewhat better than we had initially expected, although this does not account for the opportunity loss of the potential future growth from this geography.

From a human rights perspective there was no perfect solution, however it is clear that Kirin has considered the impact on local staff and business partners, as well as its commitment to shareholders. We believe the company reacted responsibly from the point it became aware of its implicit involvement in human rights atrocities, in particular that Myanmar Brewery dividends might have been used by the military in contravention of the joint venture agreement. Suspending all dividends from the joint venture and then seeking to dissolve it were the correct actions in the circumstances.

(C) Example 3:

Title of stewardship activity:

Governance - remuneration

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

With regards to remuneration, WWE confirmed that they have taken our thoughts over the years on board and will be setting out a new compensation structure. Although not finalised for 2022, we learnt that a number of our concerns are being addressed. In particular, they are moving to a 3 year measurement period, so that their short and long term incentive plans no longer overlap. However, when we reiterated our reasons for not liking the use of stock as an incentive, they responded that this approach is fairly typical in the US and is not an issue for the large majority of their shareholders. We were pleased to see that the indications of forthcoming change last year have been confirmed and finalised in the first half of 2023.

(D) Example 4:

Title of stewardship activity:

Governance - Remuneration
Mondelez

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Lindsell Train pays careful consideration to the compensation policies of the companies in which we invest. In assessing their compensation policies we focus more on how incentives are structured rather than the actual quantum of compensation. In other words we can be comfortable with large rewards provided that the incentives are aligned with shareholders' interests and our principles. In the case of Mondelez we do not believe that the company's compensation policy is aligned with the long-term best interests of the shareholders and have been engaging with the company on this matter over a number of years.

Prior to 2020 we had voted against Mondelez compensation resolutions, however over the past three years Mondelez management have made a significant effort to explain to our investment team the rationale for their policies during our various engagements with them.

Whilst their policy has not responded to our feedback, our abstention indicates our intent to support Mondelez management in the event that they do amend their policy to align more closely with our views on compensation, and also rewards management's active engagement with Lindsell Train.

We continue to engage with Mondelez on this matter and we engaged with Mondelez's compensation committee before the vote to signal our intention to Abstain.

(E) Example 5:

Title of stewardship activity:

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

CLIMATE CHANGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

Has your organisation identified climate-related risks and opportunities affecting your investments?

(A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

As a product of our investment philosophy (long term, low turnover and focussed on finding durable and cash generative businesses), we have a structural preference for capital-light companies. This means that we do not invest in capital intensive industries (such as car manufacturers and telecommunications) or any companies involved in the extraction and production of coal, oil or natural gas.

In the context of the transition to a low-carbon economy, the omission of these sectors, by their nature, means we are starting from a relatively good place (we also acknowledge that it means that climate-related transitional opportunities may be more limited). That said, all companies are affected to a greater or lesser extent by climate change and we must ensure that we are able to identify and monitor the risks (and opportunities) faced by companies, both when we are researching them at the outset and then on an ongoing basis for the companies in which we are invested.

Since our inception, one of the features ingrained in Lindsell Train's philosophy is the search for truly sustainable brands - those which have survived the challenges of the past and have the potential to continue to grow, adapt and appeal to consumers worldwide.

Often these are owners of unique and valuable intellectual property. We find the large majority of our candidate investments in three broad industry categories (consumer & healthcare franchises, media/software, and financials & networks).

Consequently, the key risks presented to our businesses from a climate perspective are primarily transition risks, including but not limited to the following: reputational risk, litigation risk, increased operating costs, rising R&D costs and reduced demand for products and services because of shifts in consumer preferences.

Our investment time horizons are very strategic and so when we commit to an investment we intend to hold it for the very long term, which for us means 20+ years, covering several economic and stock market cycles, and so we must be continually alert to all relevant long-term issues - including those related to climate change - with the objective of pre-empting risk and enhancing returns.

At present, climate reporting is not yet mandatory across the board within the asset management industry; however, initiatives and industry-led groups (such as TCFD) are mounting pressure and so it is only a matter of time.

Similarly, we expect our investee companies to be more exposed to climate regulation and therefore the financial materiality of the risks associated with our portfolio companies not meeting the required objectives must not be underestimated over the longer term.

We are also acutely aware of the risks associated with the demands of a discerning consumer (with younger people in particular more educated about climate risk and increasingly unnerved about the prospects for their future) and the associated changes in their investment preferences. As owners of global brands, it is imperative that we monitor and manage this risk.

In anticipation of regulatory reform and to ensure accountability surrounding our net zero aspirations, Lindsell Train became a signatory of the Net Zero Asset Managers (NZAM) initiative in December 2021 and, in accordance, during 2022 established and disclosed our interim target, in line with the Paris Aligned Investment Initiative (PAII) Net Zero Investment Framework.

- (B) Yes, beyond our standard planning horizon
- (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

● (A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

Given our climate exposure comes predominantly from the investment portfolios we manage for our clients, this is our key focus. So, whilst we have not made any changes to the fundamentals of our investment philosophy or process in response to the increased attention given to ESG (and specifically climate change), enhancements have been introduced along the way in order to respond to the evolving material risks and opportunities posed to our companies.

The key initiatives we have taken are:

- the introduction of our ESG database (Sentinel)
- the establishment of our ESG Committee
- measurement and monitoring of carbon metrics for our investee companies and portfolios
- the publishing of our TCFD report
- and becoming a signatory of NZAM

In addition, as ESG has moved up the agenda of Lindsell Train's Board (and specifically under the responsibility of the Board's sub-committee, the ESG Committee), senior management understand the need both to ensure that we continue to meet our clients' escalating climate integration and reporting demands and also that we assess the risks and opportunities to our business strategy in terms of our product offering.

- (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?

- (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- (B) Yes, using the One Earth Climate Model scenario
- (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
- (D) Yes, using other scenarios
- (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

- (A) Yes, we have a process to identify and assess climate-related risks
 - (1) Describe your process

From an investment risk perspective, climate risks are identified and assessed through stock level research conducted by the investment team. All ESG research is catalogued via our proprietary database, Sentinel. Like all our company analysis, this research is bottom-up and sourced from published reports and accounts, together with other publicly available information and meetings with management. Sentinel helps us to centralise and codify our team's views, as well as to prioritise our ongoing research and engagement work.

We cross-reference this work with the SASB Materiality Map®, which identifies likely material sustainability issues on an industry-by-industry basis, allowing us to coordinate research along (increasingly standardised) industry reporting methods, and to mitigate against potential blind-spots.

Importantly, however, the extensive research conducted to identify the ESG risks posed at a stock-specific level is our own. The majority of this work is qualitative in nature, however there is a quantitative element to the database to the extent that we score the ESG risks posed to each business based on a proprietary scale of materiality.

We have gathered net zero alignment information for each of the 70 or so companies we invest in across our firm. We also collate Scope 1, 2 and 3 (where available) emissions data, which is stored within Sentinel and then used to measure the carbon footprint/intensity of our portfolios. We do not typically make use of more complex quantitative analytics or proprietary technologies although we are open to reviewing the tools currently available to test and support our transition conclusions and also ensure that our investment portfolios are decarbonizing in a way that is consistent with achieving net zero greenhouse gas emissions by 2050. Ultimately, we expect the improvement to be driven mainly by targeted engagement with management (together with overall industry pressure). It is imperative therefore that we have an effective engagement framework in place.

(2) Describe how this process is integrated into your overall risk management

ESG, including climate change, is a standing agenda item at quarterly meetings of the Lindsell Train Board (comprising six executive directors and two non-executive directors, as at the end of the reporting year) or Management Committee (comprising the six executive directors), who are together responsible for Lindsell Train's responsible investment strategy and for ensuring that all appropriate processes and policies are in place. In addition, an ESG Committee was established by the Board in March 2021 to ensure the clear definition of the Company's ESG strategy and to provide a formal forum to discuss ESG risks and opportunities to our business, with the objective of identifying, monitoring and mitigating ESG risks and effecting change. Our ESG Committee is chaired by one of our founders, Nick Train. The committee draws on the expertise of all departments at Lindsell Train and makes recommendations to the Board.

A key element of the ESG Committee's remit is to work in conjunction with the Risk and Compliance Committee to oversee the identification and mitigation of risk relating to ESG, including climate change. The ESG Committee is also responsible for establishing policies and procedures and ensuring their effective implementation.

(B) Yes, we have a process to manage climate-related risks

(1) Describe your process

When considering climate risk at portfolio level, what we do not own is arguably more important than what we do own. This is because as a consequence of our long-term investment approach, focused on identifying durable companies, we do not invest in capital intensive industries (energy, commodities or mining) or any companies involved in the extraction and production of coal, oil or natural gas. As a result, our portfolios are at the lower end of the climate risk scale (confirmed through metrics such as carbon emissions).

That said, all companies are affected to a greater or lesser extent by climate change and we must ensure that we are able to identify and manage the risks (and opportunities) within our research process.

Our primary process to manage climate risk in relation to our portfolio holdings is through effective, targeted company engagement on such topics. We have two advantages that make us confident of effective engagement; the fact that our portfolios are highly concentrated (20-30 companies) so the ongoing workload is entirely manageable; and our long-term investment horizon, which leads to well-established strategic partnerships built with company management over time. Indeed, the role that company engagement plays in our process has never been more critical.

During 2022, Madeline Wright (Head of Investment ESG) concluded a large-scale project to hold an ESG specific discussion with every company in our portfolios in order to establish a baseline for our ongoing engagement.

With regards to climate change, the objective was to better understand the specific risk areas and also to assess the preparedness of our companies to transition to net zero.

We will now use this information to track each company's progress. Whilst our long-term approach generally leads us to be supportive of company management, where required and if in the best interests of our clients, we will lean more heavily on management to influence specific matters or policies. Given we often build up large, long-term stakes in the businesses in which we invest we find that management are open to (and very often encourage) engaging with Lindsell Train.

Constructive dialogue has more often than not resulted in satisfactory outcomes, thus limiting the need for escalation. However, where this is not the case, we will consider escalating our engagement and stewardship activities.

(2) Describe how this process is integrated into your overall risk management

Lindsell Train's Board of Directors has overall responsibility for ensuring that all appropriate processes and policies are in place and for assessing the effectiveness of the firm's activities. ESG, including climate change, is a standing agenda item at quarterly meetings of the Board or Management Committee, who are together responsible for Lindsell Train's responsible investment strategy. In addition, an ESG Committee was established by the Board in March 2021 to ensure the clear definition of the Company's ESG strategy and to provide a formal forum to discuss ESG risks and opportunities to our business, with the objective of identifying, monitoring and mitigating ESG risks and effecting change. Our ESG Committee is chaired by one of our founders, Nick Train. The committee draws on the expertise of all departments at Lindsell Train and makes recommendations to the Board.

A key element of the ESG Committee's remit is to work in conjunction with the Risk and Compliance Committee to oversee the identification and mitigation of risk relating to ESG, including climate change. The ESG Committee is also responsible for establishing policies and procedures and ensuring their effective implementation.

- (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and disclose?

(A) Exposure to physical risk

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used
 - (2) Metric or variable used and disclosed**
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.lindselltrain.com/application/files/5816/8069/2997/LindsellTrain_TCFD_Report_2023_Final.pdf

(B) Exposure to transition risk

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used
 - (2) Metric or variable used and disclosed**
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.lindselltrain.com/application/files/5816/8069/2997/LindsellTrain_TCFD_Report_2023_Final.pdf

(C) Internal carbon price

(D) Total carbon emissions

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used**
 - (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology

(E) Weighted average carbon intensity

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used
 - (2) Metric or variable used and disclosed**
 - (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.lindselltrain.com/application/files/5816/8069/2997/LindsellTrain_TCFD_Report_2023_Final.pdf

- (F) Avoided emissions
- (G) Implied Temperature Rise (ITR)
- (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals
- (I) Proportion of assets or other business activities aligned with climate-related opportunities
- (J) Other metrics or variables
- (K) Our organisation did not use or disclose any climate risk metrics or variables affecting our investments during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, did your organisation disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

(A) Scope 1 emissions

(1) Indicate whether this metric was disclosed, including the methodology

(1) Metric disclosed

(2) Metric and methodology disclosed

(2) Provide links to the disclosed metric and methodology, as applicable

https://www.lindselltrain.com/application/files/5816/8069/2997/LindsellTrain_TCFD_Report_2023_Final.pdf

(B) Scope 2 emissions

(1) Indicate whether this metric was disclosed, including the methodology

(1) Metric disclosed

(2) Metric and methodology disclosed

(2) Provide links to the disclosed metric and methodology, as applicable

https://www.lindselltrain.com/application/files/5816/8069/2997/LindsellTrain_TCFD_Report_2023_Final.pdf

(C) Scope 3 emissions (including financed emissions)

(1) Indicate whether this metric was disclosed, including the methodology

(1) Metric disclosed

(2) Metric and methodology disclosed

(2) Provide links to the disclosed metric and methodology, as applicable

https://www.lindselltrain.com/application/files/5816/8069/2997/LindsellTrain_TCFD_Report_2023_Final.pdf

(D) Our organisation did not disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

- (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

- (A) The UN Sustainable Development Goals (SDGs) and targets
- (B) The UNFCCC Paris Agreement
- (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (E) The EU Taxonomy
- (F) Other relevant taxonomies
- (G) The International Bill of Human Rights
- (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (I) The Convention on Biological Diversity
- (J) Other international framework(s)
- (K) Other regional framework(s)
- (L) Other sectoral/issue-specific framework(s)
- (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2

What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

- (A) Identify sustainability outcomes that are closely linked to our core investment activities
- (B) Consult with key clients and/or beneficiaries to align with their priorities
- (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character
- (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues
- (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
- (F) Understand the geographical relevance of specific sustainability outcome objectives
- (G) Other method
- (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

- (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2

Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

- (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons
- (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- (C) We have been requested to do so by our clients and/or beneficiaries
- (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes
- (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)
- (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- (H) Other

HUMAN RIGHTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49	PLUS	PGS 47	PGS 49.1	PUBLIC	Human rights	1, 2

During the reporting year, what steps did your organisation take to identify and take action on the actual and potentially negative outcomes for people connected to your investment activities?

(A) We assessed the human rights context of our potential and/or existing investments and projected how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

In 2022, Lindsell Train was pleased to confirm its support of CCLA-founded initiative Find It, Fix It, Prevent It, which is exclusively focussed on the abolition of modern slavery. As investors in several FMCG companies, we are particularly alert to modern slavery in the supply chain and the business risks it poses. Working with CCLA and other signatories, we will collaborate for change, by encouraging all our companies to proactively identify and address any incidences of modern slavery in their supply chains.

In November 2022, Madeline Wright, Deputy Portfolio Manager & Head of Investment ESG at Lindsell Train, was invited by consulting firm, Aon to speak on a panel addressing how pension fund investors and asset managers can support better outcomes regarding modern slavery.

This drew upon our practical experience of analysing modern slavery risks within the supply chains of our investee companies. Madeline shared how, as a signatory of Find It, Fix It, Prevent It, we have implemented their framework to support our engagement activities.

Examples of the types of engagement with our companies on Modern Slavery have been provided earlier in the Assessment (Burberry, Young's). A further example of our engagement on human rights is the Japanese brewery company Kirin regarding its joint venture in Myanmar - a detailed account of this multi-year engagement has been provided earlier in the Assessment.

- (B) We assessed whether individuals at risk or already affected might be at heightened risk of harm
- (C) We consulted with individuals and groups who were at risk or already affected, their representatives and/or other relevant stakeholders such as human rights experts
- (D) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities
 - (E) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.1	PLUS	PGS 49	N/A	PUBLIC	Human rights	1, 2

During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potentially negative outcomes for people connected to your investment activities?

(A) Workers

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

(B) Communities

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) Industrials
- (4) Consumer discretionary
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology
- (9) Communication services
- (10) Utilities
- (11) Real estate

(C) Customers and end-users

(D) Other stakeholder groups

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.2	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, what information sources did your organisation use to identify the actual and potentially negative outcomes for people connected to its investment activities?

(A) Corporate disclosures

Provide further detail on how your organisation used these information sources:

We read all investee company publications thoroughly including checking for information about human rights.

(B) Media reports

Provide further detail on how your organisation used these information sources:

We pay close attention to media reports about any of our portfolio companies and if need be follow up with the company directly for clarification.

(C) Reports and other information from NGOs and human rights institutions

Provide further detail on how your organisation used these information sources:

We receive information from Find, Fix it, Prevent it.

(D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank

(E) Data provider scores or benchmarks

(F) Human rights violation alerts

(G) Sell-side research

Provide further detail on how your organisation used these information sources:

We use sell-side research exclusively to inform us, not to influence our decisions.

- (H) Investor networks or other investors
- (I) Information provided directly by affected stakeholders or their representatives
- (J) Social media analysis
- (K) Other

LISTED EQUITY (LE)

OVERALL APPROACH

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your listed equity strategies?

(3) Active - fundamental

(A) Yes, our investment process incorporates material governance factors	(1) for all of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	(1) for all of our AUM
(C) Yes, our investment process incorporates material ESG factors beyond our organisation's average investment holding period	(1) for all of our AUM
(D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their discretion	o

(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors

MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 2	CORE	OO 21	N/A	PUBLIC	Monitoring ESG trends	1

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your listed equity strategies?

(3) Active - fundamental

(A) Yes, we have a formal process that includes scenario analyses

(B) Yes, we have a formal process, but it does not include scenario analyses

(C) We do not have a formal process for our listed equity strategies; our investment professionals monitor how ESG trends vary over time at their discretion

(D) We do not monitor and review the implications of changing ESG trends on our listed equity strategies

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How does your financial analysis and equity valuation or security rating process incorporate material ESG risks?

(2) Active - fundamental

(A) We incorporate material governance-related risks into our financial analysis and equity valuation or security rating process

(1) in all cases

(B) We incorporate material environmental and social risks into our financial analysis and equity valuation or security rating process

(1) in all cases

(C) We incorporate material environmental and social risks related to companies' supply chains into our financial analysis and equity valuation or security rating process

(1) in all cases

(D) We do not incorporate material ESG risks into our financial analysis, equity valuation or security rating processes

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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 4	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

What information do you incorporate when you assess the ESG performance of companies in your financial analysis, benchmark selection and/or portfolio construction process?

(3) Active - fundamental

(A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors

(1) in all cases

(B) We incorporate qualitative and/or quantitative information on historical performance across a range of material ESG factors

(1) in all cases

(C) We incorporate qualitative and/or quantitative information on material ESG factors that may impact or influence future corporate revenues and/or profitability

(1) in all cases

(D) We incorporate qualitative and/or quantitative information enabling current, historical and/or future performance comparison within a selected peer group across a range of material ESG factors

(E) We do not incorporate qualitative or quantitative information on material ESG factors when assessing the ESG performance of companies in our financial analysis, equity investment or portfolio construction process

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ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 5	PLUS	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

Provide an example of how you incorporated ESG factors into your equity selection and research process during the reporting year.

Unilever and Shiseido

Effective 1st May 2021, China removed mandatory animal testing requirements for imported cosmetics. This was welcome news for a number of our portfolio holdings, as animal testing of health and personal care products, cosmetics and fragrances was not only unnecessary but also acted as a significant barrier to the growing numbers of cruelty-conscious consumers globally. Given the potential implications for several of our companies, we have been monitoring these developments closely and seeking to both understand the nuances of the Chinese regulatory changes and gain a picture of the possible future opportunity for our portfolio companies. Through our engagement in early 2022, we have established that the scope of animal testing in China has been significantly narrowed, however it has not entirely lifted. For example, products with ‘active ingredients’ or ‘special functions’ (e.g., sunscreens) still require animal testing. And for those products that no longer require testing, there are still regulatory hoops to jump through – and of course new protocols often come with teething problems! Nonetheless, notable progress has been made and clearly this has huge positive implications for many of our portfolio companies.

From a regulatory perspective, these developments recognise the regulators’ awareness of the rising consumer demand for cruelty-free products and the continuing global alignment of ethical standards and expectations, which should be commended. Of course, for our portfolio companies there are also significant positive implications: being able to serve the Chinese market whilst retaining – or indeed gaining – a company-wide “cruelty free” marque is hugely valuable (and hitherto impossible). In the case of Unilever, the removal of mandatory testing concludes 10 years of hard work to ban this practice and significantly broadens the cross-border ecommerce opportunities for several of their brands. This is particularly relevant as an opportunity for Unilever’s Prestige brands, for which China is a key market for the category globally. Shiseido and Estee Lauder alluded to similar tailwinds when we engaged with them on the matter, but did alert us to the fact that there is still much to be done in order to operate in compliance with the laws and regulations applicable to each product category and the country of production. We will continue to monitor the implications of these changes where relevant.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

How do material ESG factors contribute to your stock selection, portfolio construction and/or benchmark selection process?

(3) Active - fundamental

(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process

(1) for all of our AUM

(B) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process

(C) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process

(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process

(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors

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POST-INVESTMENT

ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 9	CORE	OO 17.1 LE, OO 21	N/A	PUBLIC	ESG risk management	1

What compliance processes do you have in place to ensure that your listed equity assets subject to negative exclusionary screens meet the screening criteria?

- (A) We have internal compliance procedures that ensure all funds or portfolios that are subject to negative exclusionary screening have pre-trade checks
- (B) We have an external committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- (C) We have an independent internal committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- (D) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 10	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

For the majority of your listed equity assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

(2) Active - fundamental

(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual listed equity holdings

(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other listed equity holdings exposed to similar risks and/or incidents

(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities

(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents

(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their discretion

(F) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process

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PERFORMANCE MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 11	PLUS	OO 21	N/A	PUBLIC	Performance monitoring	1

Provide an example of how the incorporation of ESG factors in your listed equity valuation or portfolio construction affected the realised returns of those assets.

Our portfolio construction process is entirely bottom-up. In terms of stock selection, we find the large majority of our candidate investments in four broad industry categories (consumer franchises, internet/media/software, financials and marketplaces), all of which typically score well on ESG metrics. Furthermore, we do not invest in mining or commodity companies, nor do we invest in tobacco companies, weapons manufacturers or gambling companies since we do not believe these companies will deliver sustainable returns over the very long term.

When we are considering whether to start a new position or sell out of a holding we will of course conduct extensive research to support that decision and if we believed that an ESG factor was likely to impact the long-term durability of a company then that could influence our decision – in particular, the long-term growth rate that we apply in a valuation.

From an opportunity perspective, whilst we can't directly attribute the company's share price performance to any single factor, ESG or other, we would note the positivity associated with social and environmental awareness demanded by today's consumer.

Consumers are increasingly aware of the carbon footprint of the products they consume, and increasingly inclined to make choices based on that knowledge; we believe that brands which fail to address this shift are likely to be disadvantaged in future versus those which have done so.

Far from viewing efforts to reduce their carbon footprint as a risk, we see these changes as necessary investments in our portfolio companies' future returns and closely monitor their progress in doing so.

In the short term, we would anticipate increased costs for companies making changes to the way they do business - for example, Heineken shifting its breweries to become "carbon neutral" incurs costs (such as the spend to install solar panels and connect the brewery up to local heat sources, or switch to biomass heating) until the transformation is complete. Nevertheless, we agree with our portfolio companies' view that these costs are necessary investments for the future, not just protecting the company against potential financial hits (e.g.

stranded assets or a newly imposed carbon tax burden), but also shoring up the brand's reputation and resonance.

Additionally, the management of these companies are increasingly recognising and responding to the potential rewards from anticipating consumer demands, which in today's world are increasingly focussed on living a healthier and more socially conscious lifestyle. Indeed, many alcoholic beverage companies have successfully launched low or zero alcohol offerings to meet this demand. One such example is Heineken 0.0 (their non-alcoholic lager beer) which is now available in over 60 countries, making it the fastest scaling of a brand in the history of the company. The brand continues to see double digit growth overall, and growth in every region in which it operates.

DISCLOSURE OF ESG SCREENS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 12	CORE	OO 17 LE, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

For all your listed equity assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

- (A) We share a list of ESG screens
- (B) We share any changes in ESG screens
- (C) We explain any implications of ESG screens, such as their deviation from a benchmark or impact on sector weightings
- (D) We do not share the above information for all our listed equity assets subject to ESG screens

SUSTAINABILITY OUTCOMES (SO)

SETTING TARGETS AND TRACKING PROGRESS

SETTING TARGETS ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 1	PLUS	PGS 48	SO 2, SO 2.1, SO 3	PUBLIC	Setting targets on sustainability outcomes	1, 2

What specific sustainability outcomes connected to its investment activities has your organisation taken action on?

- (A) Sustainability outcome #1
 - (1) Widely recognised frameworks used to guide action on this sustainability outcome
 - (1) The UN Sustainable Development Goals (SDGs) and targets
 - (2) The UNFCCC Paris Agreement
 - (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
 - (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
 - (5) The EU Taxonomy
 - (6) Other relevant taxonomies
 - (7) The International Bill of Human Rights

- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) **Environmental**
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

NZAM Portfolio Coverage Commitment

(4) Number of targets set for this outcome

- (1) No target
- (2) **One target**
- (3) Two or more targets

(B) **Sustainability outcome #2**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) **The UNFCCC Paris Agreement**
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) **Environmental**
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

NZAM AUM commitment

(4) Number of targets set for this outcome

- (1) No target
- (2) **One target**
- (3) Two or more targets

- (C) Sustainability outcome #3
- (D) Sustainability outcome #4
- (E) Sustainability outcome #5
- (F) Sustainability outcome #6
- (G) Sustainability outcome #7
- (H) Sustainability outcome #8
- (I) Sustainability outcome #9
- (J) Sustainability outcome #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2	PLUS	SO 1	SO 2.1, SO 4, SO 5	PUBLIC	Setting targets on sustainability outcomes	1

For each sustainability outcome, provide details of up to two of your nearest-term targets.

(A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1:	NZAM Portfolio Coverage Commitment	
(1) Target name	NZAM Portfolio Coverage Target	
(2) Baseline year	2022	
(3) Target to be met by	2030	
(4) Methodology	Portfolio Coverage Target in line with the Paris Aligned Investment Initiative (PAII) Net Zero Investment Framework. Using the prescribed criteria in the framework, the Portfolio Coverage Target enables us to categorise our portfolio companies' progress along their net zero pathways and measure the overall progress in alignment of our exposure.	
(5) Metric used (if relevant)	Percentage of AUM categorised as Aligned according to the PAII Net Zero Investment Framework. Please see the Appendix of our TCFD Report for greater details on categorisation criteria; https://www.lindselltrain.com/application/files/5816/8069/2997/LindsellTrain_TCFD_Report_2023_Final.pdf	
(6) Absolute or intensity-based (if relevant)		
(7) Baseline level or amount (if relevant):	36%	
(8) Target level or amount (if relevant)	55%	

(9) Percentage of total AUM covered in your baseline year for target setting 94%

(10) Do you also have a longer-term target for this? (1) Yes

(B1) Sustainability Outcome #2: Target details

(B1) Sustainability Outcome #2: NZAM AUM commitment

(1) Target name Net Zero Asset Management AUM commitment

(2) Baseline year 2022

(3) Target to be met by 2050

(4) Methodology Percentage of discretionary AUM managed that is included within NZAM net zero commitment

(5) Metric used (if relevant)

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant): 94%

(8) Target level or amount (if relevant) 100%

(9) Percentage of total AUM covered in your baseline year for target setting 100%

(10) Do you also have a longer-term target for this? (2) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2.1	PLUS	SO 1, SO 2	N/A	PUBLIC	Setting targets on sustainability outcomes	1

For each sustainability outcome, provide details of up to two of your long-term targets.

	(1) Target name	(2) Long-term target to be met by	(3) Long-term target level or amount (if relevant)
(A1) Sustainability Outcome #1: NZAM Portfolio Coverage Commitment	NZAM Portfolio Coverage Target	2050	100%

TRACKING PROGRESS AGAINST TARGETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4	PLUS	SO 2	SO 4.1	PUBLIC	Tracking progress against targets	1

Does your organisation track progress against your nearest-term sustainability outcomes targets?

(A1) Sustainability outcome #1:

(A1) Sustainability outcome #1:	NZAM Portfolio Coverage Commitment
Target name:	NZAM Portfolio Coverage Target
Does your organisation track progress against your nearest-term sustainability outcome targets?	(1) Yes

(B1) Sustainability outcome #2:

(B1) Sustainability outcome #2: NZAM AUM commitment

Target name: Net Zero Asset Management AUM commitment

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4.1	PLUS	SO 4	N/A	PUBLIC	Tracking progress against targets	1

During the reporting year, what qualitative or quantitative progress did your organisation achieve against your nearest-term sustainability outcome targets?

(A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1: NZAM Portfolio Coverage Commitment

(1) Target name: NZAM Portfolio Coverage Target

(2) Target to be met by: 2030

(3) Metric used (if relevant): Percentage of AUM categorised as Aligned according to the PAII Net Zero Investment Framework. Please see the Appendix of our TCFD Report for greater details on categorisation criteria; https://www.lindselltrain.com/application/files/5816/8069/2997/LindsellTrain_TCFD_Report_2023_Final.pdf

(4) Current level or amount (if relevant)

(5) Other qualitative or quantitative progress The target was set (and approved by the IIGCC) in December 2022 and therefore progress is yet to be evaluated.

Progress will be measured on an annual basis.

(6) Methodology for tracking progress Our Portfolio Coverage Target looks at the percentage of our committed assets that can be categorised as Aligned to Net Zero pathways, as defined by the Paris Aligned Investment Initiative (PAII) Net Zero Investment Framework. At each assessment point we will re-assess the categorisation of each of our holdings to aggregate our exposure into the different framework categorisations.

(B1) Sustainability Outcome #2: Target details

(B1) Sustainability Outcome #2: NZAM AUM commitment

(1) Target name Net Zero Asset Management AUM commitment

(2) Target to be met by 2050

(3) Metric used (if relevant)

(4) Current level or amount (if relevant)

(5) Other qualitative or quantitative progress The baseline of 94% was set during the Reporting Year (2022) and therefore progress has yet to be evaluated.

(6) Methodology for tracking progress The assets that were omitted from the commitment related to segregated accounts where the clients did not provide confirmed alignment preferences with Net Zero. We will continue to engage with the clients that were not included within the base line commitment to understand if their position has changed. This will be conducted every three years, where the total AUM commitment will be recalculated.

CONFIDENCE-BUILDING MEASURES (CBM)

CONFIDENCE-BUILDING MEASURES

APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

How did your organisation verify the information submitted in your PRI report this reporting year?

- (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy
- (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- (G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI
 - (H) We did not verify the information submitted in our PRI report this reporting year

INTERNAL REVIEW

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

Who in your organisation reviewed the responses submitted in your PRI report this year?

- (A) Board, trustees, or equivalent
 - Sections of PRI report reviewed
 - (1) the entire report
 - (2) selected sections of the report
- (B) Senior executive-level staff, investment committee, head of department, or equivalent
 - Sections of PRI report reviewed
 - (1) the entire report
 - (2) selected sections of the report

- (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year