

PENSIONS COMMITTEE

22 MARCH 2023

INVESTMENT STRATEGY STATEMENT (ISS) AND CLIMATE RISK STRATEGY UPDATE

Recommendation

1. The Chief Financial Officer recommends that:

- a) The Fund's 2023 Investment Strategy Statement (ISS) set out at Appendix 1 be approved;**
- b) The updated LGPS Central Voting Principles Appendix 2 be approved;**
- c) The Climate Risk Strategy set out at Appendix 3 be approved;**
- d) The Fund's ESG Workshop Review on the 8 February 2023 and the recommended outcomes be noted;**
- e) The Fund's 3rd Annual Climate Risk Report (Appendix 4) be noted; and**
- f) The 'Task Force on Climate related Financial Disclosures' (TCFD) Report (Appendix 5) be approved.**

Background

2. The LGPS Investment Regulations that came into effect from 1 November 2016 required all funds to publish a new ISS by 1 April 2017. The Fund's 2017 ISS was designed in collaboration with the seven other funds within LGPS Central to ensure a consistent approach to investment beliefs and responsible investment beliefs.

3. Under Regulation 7(6) and (7); the ISS must then be kept under review and revised from time to time and at least every three years. The Department for Levelling Up, Housing & Communities (DLUHC) outlines guidance on preparing and maintaining an Investment Strategy Statement.

4. The current 2022 ISS was approved by the Committee on 3 March 2022 and a key focus was to continue to enhance and strengthen the 'Stewardship and Responsible Investment (RI) areas. This was after taking into account the Funds Environmental, Social & Governance (ESG) Audit, Sustainable Development Goals (SDG) mapping, the Funds second 2021 Climate Risk report provided by LGPS Central and the first annual ESG review that the Fund conducted on 2 February 2022.

Investment Strategy Statement Guidance Requirements

5. Regulation 7(1) requires an Administering Authority to formulate an investment strategy which must be in accordance with guidance issued by the Secretary of State. The ISS must include:

- a) A requirement to invest money in a wide variety of investments;
- b) The authority's assessment of the suitability of particular investments and types of investments;
- c) The authority's approach to risk, including the ways in which risks are to be measured and managed;
- d) The authority's approach to pooling investments, including the use of collective investment vehicles and shared services;
- e) The authority's policy on how social, environmental, or corporate governance considerations are taken into account in the selection, non-selection, retention, and realisation of investments; and
- f) The authority's policy on the exercise of rights (including voting rights) attaching to investments.

2023 Draft Investment Strategy Statement (Appendix 1) proposed amendments

6. The key amendments are highlighted via tracked changes and shaded areas. These mainly relate to:

- a) Updating the cashflow management risks;
- b) Updating information around the Funds surplus as at the 2022 Triennial Valuation.
- c) Updating the Voting Principles provided by LGPSC.(Appendix 2);
- d) The Funds commitment to the enhanced UK Stewardship code;
- e) Taking out the compliance with the Myners principles (was section 12 of the ISS) as this has been superseded by compliance to the UK Stewardship Code;
- f) Update to the Funds Strategic Allocation Investment Benchmark(SAIB) increase the Funds US Passive equity investment and reducing its UK passive equity investment by 5%; and
- g) Noting the allocation within the SAIB to Private Equity by using the flexibility within the strategic asset allocation ranges that are available to build up to the 5% over time and then make this more formal in the next Strategic Asset Allocation review in 2025.
- h) Maintain Equity Protection as a tool to be used within the Funds Strategic Asset Allocation. This is part of the Funds risk management strategy that acknowledges that the Fund continues to have a high exposure to equities, which can be quite volatile in performance terms in the short and medium term.
- i) Alongside this approach the Fund will also consider 'Re Upping' with existing Fund Managers should these investments meet the Funds key objectives.

Funds ESG Review 8 February 2023

7. The Fund had an ESG Review workshop with Committee members on the 8 February 2023 which was to review progress against the Pension Committee ESG recommendations in March 2022 and ascertain what further changes may be required when looking ahead. The workshop was led by Karen Shackleton from Pensions for Purpose who has provided valuable support for the Fund in this area since January 2020, and supported by officers and the Funds independent Investment Advisor The objectives of the review were as follows:-

- Refresh – the Fund's investment beliefs, priorities and how you can align to these.
- Review - strategic actions agreed at the last review and progress made.
- Review - Stewardship Code 2020 and TCFD reporting.
- Update on key outcomes of the Funds 3rd Climate risk report and 2nd Climate scenario analysis presented by LGPS Central.

- Consider – ESG progress in private markets (presentations from two Fund managers, Bridgepoint (Corporate Private Debt) and Stonepeak (Infrastructure)).
- Explore - case studies of LGPS funds exhibiting best practice.
- Review - key insights from the ESG pensioner members questionnaire.
- Consider - net zero goals – mapping the journey to net zero.
- Discuss – priorities for the next 12 months

8. **The workshop finished with a consideration of the next steps to consider for the next 12 months** with the issues below raised by Pensions for Purpose. General views expressed are shown by each item:

- Enhance engagement activity?** *The fund was already doing a lot on engagement activity and the Fund would target its engagement activity in line with the stewardship plan within LGPSC Climate Risk report;*
- Further member engagement?** *The current level of proposed engagement was satisfactory and the ESG questionnaire would be rolled out in 2023 to employees contributing to the Fund (around 23,000) and the following year to Deferred pension members (around 23,000);*
- More action from investment managers/pool?** *To continue to monitor the Fund managers progress in this area and work with LGPSC to enhance reporting and information on the effectiveness of engagement outcomes over time;*
- More climate solutions/more de-risking?** *Agree a decarbonisation goal for the next five years with 2020 as the baseline (an action for the committee to consider);*
- Commit to impact-driven investing?** *This may be a way to align to some of the other SDG priorities that the fund has agreed, subject to the opportunities delivering strong market-rate, risk-adjusted financial returns;*
- Training on impact investing?** *This was felt to be a good suggestion;*
- Training on Science Based Targets vs Implied Temperature Rise?** *This was felt to be a good suggestion.*

Climate Risk Strategy

9. The Fund has a separate Climate Risk Strategy (Appendix 3) for the Fund which sets out the Funds approach to addressing the risks and opportunities related to climate change. This also reflects the potential material effect of climate change, and the response to climate change, on the assets and liabilities of the Fund.

10. This has been updated to take on Committee the outcome of the ESG workshop that was conducted informally with the Pensions Committee members on the 8 February 2023. The strategy highlights the following

Allocation & Targets

- Reduce further the carbon footprint (Scope 1 & 2) of the Fund's listed equity portfolio compared to its weighted benchmark in 2022 by the end of 2023; and set an internal decarbonisation reduction target up to 2025 at which point it will be further reviewed.
- Continue to invest a proportion of the Fund's portfolio in low carbon & sustainable investments by the end of 2023.
- Use the Climate Scenario Analysis to track and better understand the portfolio's capacity to transition into a low carbon economy

Transparency & Disclosure

The Fund will:

- Prepare a TCFD Report annually
- Report on the progression against the Fund's carbon footprint and low carbon & sustainable investment targets annually
- Report on a suite of carbon metrics in the Fund's annual report.
- Disclose the stewardship reports of the Fund's key investment managers on a quarterly basis.
- Report on progress against the RI Stewardship Plan engagement goals annually.
- Set an internal carbon reduction target up to 2025 and then review thereafter

Funds 2022 Climate Risk Report

11. The Fund has received its 3rd Climate Risk Report – January 2023 report from LGPSC (Appendix 4) covering the Funds listed equity portfolio. Its purpose is to:

- a) assesses the Fund's exposure to climate-related risks and opportunities;
- b) allows the Fund to identify further means to manage its material climate risks;
- c) To highlight the report's key findings; and
- d) To provide an overview of the Fund's progress in managing climate risk.

12. The executive summary key highlights were:-

- a) The carbon intensity of the Fund's Total Equities decreased by 13% between 2020 and 2022;
- b) This overall decrease was driven by a 24% decrease in the intensity of Passive Equities, but mitigated by a 22% increase in intensity of Active Equities;
- c) The Fund's carbon intensity has remained consistently lower than the benchmark and is currently 30.1% lower;
- d) Four of the Top 5 contributors to the portfolio's Carbon Footprint are currently in the Climate Stewardship Plan meaning dedicated engagement activities;
- e) Seven out of eight of climate stewardship plan companies have been awarded a management quality of 4 (top mark) by the Transition Pathway initiative; and
- f) Seen a marginal increase in its weight in fossil fuels.

13. The key recommendations by LGPSC for the Fund were:-

- a) Continue updating the Climate Stewardship Plan following changes to the portfolio;
- b) Consider formalising a Net Zero Climate Strategy;
- c) Continue to report against the TCFD recommendations

- d) Work with fund managers to continue understanding how they identify, monitor, and mitigate climate risk; and
- e) Repeat the Carbon Risk Metrics annually and the CSA every 2-3 years.

Funds 2022 Climate Risk Report Scenario Report

14. LGPSC provided the Fund with a Climate Scenario Analysis for which Mercers complete the analysis and is to be produced every 3 years. The analysis provides three climate scenarios based on an average temperature increase of 1.5, 1.6 and 4 degrees by 2100 and demonstrates the potential impact on the Fund's Investment Strategy. The key findings of this report were presented as part of the Funds informal ESG review for members on the 8th February 2023. This will assist the Fund in its future strategic asset allocation.

Task Force on Climate related Financial Disclosures' (TCFD)

15. The Taskforce on Climate-related Financial Disclosures (TCFD) was commissioned in 2015 by Mark Carney in his remit as Chair of the Financial Stability Committee. In 2017 the TCFD released its recommendations for improved transparency by companies, asset managers, asset owners, banks, and insurance companies with respect to how climate-related risks and opportunities are being managed. Official supporters of the TCFD total 930 organisations representing a market capitalisation of over \$11 trillion. Disclosure that aligns with the TCFD recommendations currently represents best practice.

16. LGPSC have provided the fund with an updated draft TCFD report and the Fund has added areas of additional activity and outcomes that have occurred during the year and is attached as Appendix 5.

Contact Points

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Supporting Information

- Investment Strategy Statement - Appendix 1
- Updated Voting Principles – Appendix 2
- Climate Risk Strategy - Appendix 3
- Climate Risk Report March 2023 – Appendix 4
- Task Force on Climate related Financial Disclosures' (TCFD) - Appendix 5

Background Papers

In the opinion of the proper officer (in this case the Chief Financial Officer) there are no background papers relating to the subject matter of this report.