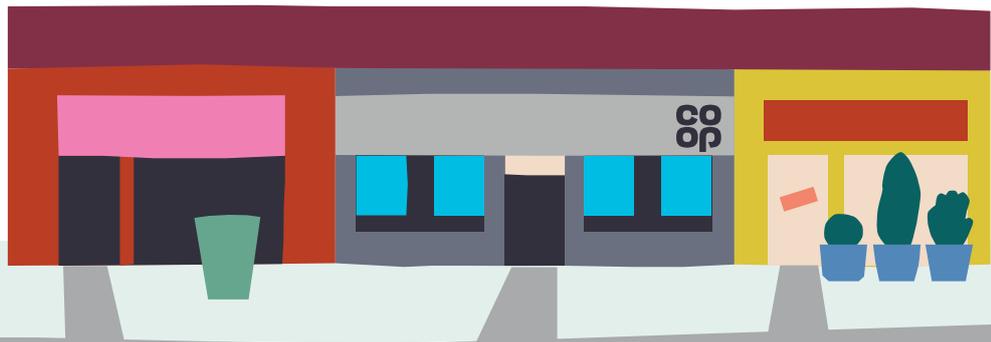




Responsible Investment Policy



This policy has been prepared by the Trustee of Pace to set out our views on responsible investment and how we address this within the Scheme.

How does Pace work and who decides how its assets are invested?

In August 2018 Pace separated into two sections – the Co-op Section and the Bank Section, covering current and former employees of the Co-op and of the Co-operative Bank respectively. Both the Co-op Section and Bank Section have defined benefit and defined contribution sections. Collectively, we refer to the defined benefit sections as ‘Pace DB’ and the defined contribution section as ‘Pace DC’. Pace’s Responsible Investment Policy covers both the Co-op and Bank Sections, and both DB and DC investments.

- **The Pace DB section** aims to pay benefits to its members and their dependants as set out in the Trust Deed and Rules. These benefits are paid out of investments selected by the Pace Trustee.
- **Pace DC** allows its members to build their own retirement pots. In the defined contribution section, members choose how they want to invest their money from a selection of investment options offered by the Trustee.

The Trustee’s investment objectives and our approach to risk management and measurement are explained in the Statement of Investment Principles for each Section. The way we invest reflects the long-term nature of Pace – we don’t pursue short-term, speculative gains.

What are the Trustee’s views on responsible investment?

As the Trustee we’re required by law to act in the best interests of our members. This means that our main responsibility is to choose investments which:

- In **Pace DB** are expected to give the best possible chance of the benefits being paid in full.
- In **Pace DC** are expected to provide the best outcome for members.

However, we’re committed to achieving these goals in a way that takes into account broader social and environmental concerns.

Responsible investment (RI) is therefore a key aim for the Trustee.

Are there any responsible investment issues that are of particular importance to the Trustee?

We would like our approach to responsible investment to reflect the views of Pace members as far as reasonably possible. We therefore welcome members' views on these issues. We also believe that our approach to responsible investment should be consistent with the values of our sponsors, and their members and colleagues, again as far as reasonably possible. Finally, we believe that our Responsible Investment Policy should reflect the extent to which environmental, social and corporate governance (ESG) issues might represent a risk to the Scheme.

Having worked with the Co-op and the Co-operative Bank, we've identified three broad issues which we feel reflect the views of the relevant stakeholders, represent particular risk to the Scheme and which we believe can be well addressed by our Responsible Investment Policy. These issues are:

- Climate change and the protection of the environment.
- Labour conditions and equal pay.
- Corporate governance.

We've also listened to Pace's members and, as a result, the Trustee supports the RE100 initiative, which encourages companies around the world to commit publicly to source all of their electricity consumption from renewable sources over time.

What is the Trustee doing to ensure that Pace invests in a responsible way?

Our main responsibility is to deliver the best possible outcomes for members. Without compromising this duty, we implement responsible investment in a number of ways:

- We consider the risk associated with ESG issues as part of our investment activities.
- Through active ownership, we use our influence as a major institutional investor to promote good ESG practices.
- In **Pace DB** we avoid, as far as reasonably possible, investing in companies that are involved in activities which we believe may conflict with the values of relevant stakeholders.
- In **Pace DC** the Pace Growth (Mixed) Fund, which is used in the default and other lifestyle strategies, takes into account the environmental and social behaviours of businesses it invests in, as well as how well they are governed and run, when deciding how much to invest in different companies. In addition, we offer an ethical equity fund, the Pace Growth (Ethical Shares) fund, and will continue to consider how the Responsible Investment Policy can be reflected in the DC section's default strategy.

We need to do this in a balanced way so that we avoid incurring high costs for Pace, for the Scheme's sponsors, or for members of the DC section.

Our approach to responsible investment applies to all markets and asset classes.

How does the Trustee allow for ESG issues when making investment decisions?

Many decisions are needed about how the Pace assets should be invested. These range from high-level decisions about asset allocation, which the Trustee makes, to decisions on the particular companies we invest in, which are made by our investment managers.

When the Trustee makes investment decisions, one of the factors we consider is the impact on our level of ESG risk, where this risk could impact the investments of the Scheme. As part of this, we have considered Pace DB's exposure to climate change risk and will use this to inform our strategy. Responsible investment is also now incorporated as one of the key strategic items for consideration in the Investment Committee's Business Plan.

Tell me more about active ownership

Being an active owner means that Pace engages with the companies it invests in, to try to improve practices, which is largely done through our investment managers. Our managers use a variety of active ownership methods, including direct discussions with senior management, and may choose not to invest in, or to disinvest from, companies if they don't feel their management are responding appropriately to concerns raised.

We believe that this engagement is an effective way of implementing positive change in the companies we invest in. We also feel that it's an important part of protecting value for Pace's members - when companies are governed properly they are more likely to be sustainable in the long term.

We're also happy to collaborate with other investors and networks such as UKSIF (the UK Sustainable Investment & Finance Forum) and ShareAction. We will also review periodically whether Pace should join the United Nations-backed Principles for Responsible Investment (PRI) initiative.

We comply with the Financial Reporting Council UK Stewardship Code, as we believe its principles to be in the interest of society at large, as well as in the Scheme's long-term financial interest.

Tell me more about the investments you are avoiding in Pace DB

We've decided that, where possible, the Scheme will avoid investing in:

- Companies involved in the manufacture or transfer of indiscriminate weapons or the manufacture or transfer of armaments to oppressive regimes.
- Government bonds issued by states which deny their citizens basic human rights.
- Companies involved in extractive industries with poor environmental standards.

We've taken steps to assess companies and screen out those which don't adhere to these standards before investing, working with MSCI, the Scheme's custodian and our investment managers. At the time of writing, these restrictions cover approximately 75% of the Co-op Section's DB assets (excluding the pensioner annuity policies purchased in early 2020) and 96% of the Bank Section's DB assets. The proportions differ between the two sections as they have distinct asset allocations, but both sections apply the Policy consistently. We recognise that we may be limited in applying restrictions in certain circumstances, for example where we are invested in 'pooled assets'. These types of funds are held collectively with other investors, normally in order to reduce costs or ensure that we can invest in a wide range of companies.

We also recognise that ethics are not always clear-cut and that difficult judgements need to be made. In deciding on which investments to avoid, we take into account the degree to which a company is involved in the activities identified above, together with any evidence that it is improving its practices and other positive aspects of its business.



How do you work with the fund managers in relation to responsible investment?

We recognise the growing expertise on responsible investment within the pensions industry and feel that the most effective way to align our investments with our values is to engage fund managers who take a responsible and sustainable approach to investment.

We appoint investment managers who will act as conscientious and capable stewards for Pace's investments. As part of the selection process we look at their expertise and track record in responsible investment, particularly when we're choosing a manager for an asset class which might be particularly exposed to ESG risks.

All of Pace's investment managers are signatories to the UN-backed Principles for Responsible Investment and adhere to the Financial Reporting Council's UK Stewardship Code, where it applies to them. These are also factors that we consider when we select investment managers.

We receive regular reports from our investment managers about their responsible investment activity and monitor this in our quarterly Manager Monitoring and Implementation Committee meetings. In addition, Pace DB's independent investment adviser, Mercer, assesses the responsible investment capabilities of our investment managers and provides a rating for each.

What information is available to members about Pace's responsible investment activity?

As responsible investors, we believe that details of our responsible investment activities should be visible and easily accessible. Our investment performance is included in the Scheme's annual report and accounts, which is published on the Scheme's website. The following information on our responsible investment activities is available on the website:

- The Scheme's Statement of Investment Principles.
- The Responsible Investment Policy.
- Our statement of compliance with the Financial Reporting Council's UK Stewardship Code.
- Our annual Responsible Investment Report, detailing our engagement activities over the past year.
- Summary report on climate change risk in Pace DB.

How often will you review the Responsible Investment Policy?

We see the development of our policy as an evolving process and intend to review our approach to responsible investment at least annually. In carrying out reviews we will take into account significant developments in market practice and any changes in the views of our stakeholders, including the sponsors' values.

We also welcome members' feedback and will consider this as we continue to develop our policy for responsible investment. If you have feedback on the Responsible Investment Policy, please let us know by email: staffpensions@coop.co.uk