

## WPP Annual progress update against policy commitments

The Wales Pension Partnership's (WPP) Joint Governance Committee (JGC) has formally approved both the WPP Responsible Investment (RI) Policy and Climate Policy. These policies are representative of the broad range of investment beliefs within the Pool, are ambitious in nature and reflective of WPP's desire to be a leader in RI. During the year, the WPP and Constituent Authorities (CAs) have worked to implement and deliver the various policy commitments.

The WPP has undertaken its annual review of progress against the commitments in the RI and Climate Policies for the year to 31 March 2025. This review forms an element of the WPP's governance processes and will be formally reflected in the WPP's Stewardship Code report for 2024/25. This review was undertaken by Hymans Robertson on behalf of the WPP and has been discussed by the WPP's RI Sub-Group and Officers Working Group, before being formally reported to and discussed by the JGC.

Appendix 1 provides an assessment of the progress the WPP has made towards delivering on the commitments in its RI Policy. Appendix 2 covers a similar assessment for commitments under the Climate Policy. In almost all areas, progress has continued to be made against the policy commitments.

### Highlights of the year

- The WPP progressed a number of recommendations from the all-Wales Climate Report (AWCR) during the year, including the Climate Framework and climate-focus list. Progress was also made in the evolution of WPP's investments, including the passive allocations and the fixed-income Sub-Funds, with work expected to be finalised during 2025.
- The WPP submitted its fourth annual Stewardship Report, continuing to be a signatory to the 2020 UK Stewardship Code. The WPP also completed its first Pool-level annual climate report, as well as updated analysis of deforestation exposure within its listed-equity Sub-Funds.
- The real estate investment programme was launched during the year, which includes a specific allocation to impact and local investments.
- On stewardship, WPP embedded its Escalation Principles, which were developed in conjunction with its service providers. WPP played an active role in both of Robeco's client panels during the year, with a number of engagement areas actively discussed, including engagement in conflict-affected and high-risk areas (CAHRAs), biodiversity (including the interlink between climate and nature), sovereign engagement (including policy engagement) and climate change.

## Areas for future focus

In completing this assessment, we note the following potential areas for activity/improvement for 2025/26:

- 1 **Climate and nature:** continue discussions around a common climate goal during 2025/26; continue to evolve reporting by incorporating information around nature and develop climate reporting to include scenario analysis.
- 2 **Impact and local:** continue to identify investment opportunities in local and impact investments, including in natural capital.
- 3 **Stewardship:** further embedding of the escalation principles, in collaboration with service providers, as well as in the evolution of policy more generally.
- 4 **Collaboration:** formalise processes for collaborative stewardship (including around voting).

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For and on behalf of Hymans Robertson LLP

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## Risk warning

Please note the value of investments, and income from them, may fall as well as rise. This includes equities, government or corporate bonds, and Real Estate, whether held directly or in a pooled or collective investment vehicle. Further, investments in developing or emerging markets may be more volatile and less marketable than in mature markets. Exchange rates may also affect the value of an overseas investment. As a result, an investor may not get back the amount originally invested. Past performance is not necessarily a guide to future performance.

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## Appendix 1: Progress against RI Policy commitments

RAG key:

Policy expectations have been met

Policy expectations have been partially met; steps to green are outlined

Policy expectations have not been met

Ref	Commitment/ Policy Statement	Update/ Comment	RAG
<b>Investment Strategy</b>			
3.3	WPP will consult with Constituent Authorities on at least an annual basis to determine their individual investment requirements and longer-term aspirations. WPP will use this information to prioritise the development and launch of future investment offerings within the WPP.	During 2024/25, WPP appointed managers to launch three real estate buckets, with the programmes due to launch in 2025.  Further progress was also made on: <ul style="list-style-type: none"> <li>• Sustainable fixed income</li> <li>• Evolution of the passive mandates</li> <li>• Natural capital</li> </ul>	●
3.4	The WPP will consider opportunities arising from a greater understanding of ESG factors. These opportunities could include impact and/or sustainability-themed strategies, as well as social-beneficial investments. WPP may propose such opportunities directly for consideration by Constituent Authorities, including strategies that either meet the RI requirements of Constituent Authorities or have the potential to deliver benefit within the regions covered by the Constituent Authorities.	A number of local and sustainability-themed opportunities were presented to Officers during the year for consideration. Further development of local and impact opportunities is expected during 2025 and 2026.	●
<b>Climate change</b>			
4.3	WPP will engage with its service providers to ensure that a common mechanism for monitoring and understanding climate-related exposures, including risks and solutions, can be developed in respect of all WPP assets.	The WPP continues to monitor climate exposure through quarterly climate & ESG risk deep-dives into WPP's active Sub-Funds. Each fund is considered at least on an annual basis. Russell currently also reports on climate risks within Russell-managed Sub-Funds on a quarterly basis and has started including its Net Zero Dashboard as part of these reports.  WPP also receives reporting on climate (and other metrics) from the private-markets managers.	●

		At the end of 2024, the climate & ESG risk reports began incorporating greater climate data (including scope 3, Transition Pathway Initiative scoring, Net Zero Investment Framework alignment and engagement information from Climate Action 100+). WPP also launched its climate-focus list and accompanying reporting.	
4.4	WPP will encourage, through its service providers and delegates, all investee companies to disclose in line with the requirements of the TCFD.	<p>Engagement activity is carried out via Robeco and Russell. WPP has highlighted this requirement to Robeco through its stewardship themes.</p> <p>Robeco incorporate expectations around TCFD disclosures within several of their climate-related engagement themes, including: Net Zero Carbon Emissions theme (an 'evergreen' theme, with new companies being engaged on a rolling basis); Climate and Nature Transition of Financial Institutions; Acceleration to Paris (an enhanced engagement theme); Just Transition in Emerging Markets.</p>	●
<b>Nature</b>			
5.2	WPP will endeavour to monitor and report on nature risk, as far as it is able, and will work with its service providers and delegates to ensure adequate stewardship on this issue.	WPP conducted its first report covering nature risk (including deforestation) within the active-equity Sub-Funds. The report was also shared and discussed with Size of Wales and will now be an annual exercise.	●
<b>Human rights</b>			
6.3	WPP will endeavour to identify and engage organisations on human rights issues both through WPP's membership of LAPFF and via the engagement activity undertaken by WPP's V&E Provider.	<p>Robeco has engaged with companies specifically on human rights under its Human Rights Due Diligence for CAHRAs. Among other objectives, this engagement expects companies operating in CAHRAs to conduct a thorough context analysis, taking the best-practice three-step model of the UN into account.</p> <p>WPP has also been supportive of the expansion in the stewardship work of LAPFF around CAHRAs, including with specific regard to the Occupied Palestinian Territories. This includes the Public Statement on LAPFF's expectations of companies operating in CAHRAs, as well as</p>	●

		<p>additional stewardship and reporting work to be undertaken on members' behalf.</p> <p>In specific regard to the OPT, WPP has been actively monitoring our potential exposures, including those companies identified on the list from the UN High Commissioner for Human Rights, as well as those identified in other relevant sources. WPP has also engaged Waystone and Russell IM to understand exposure and stewardship activity by the underlying investment managers in the OPT.</p> <p>To note, other human rights engagements from Robeco include: Just Transition in Emerging Markets; Modern Slavery in Supply Chains; Fashion Transition; Sound Social Management; Good Governance; Global Controversy Engagement.</p>	
6.4	The WPP will report on how engagement activity undertaken by its service providers and delegates has addressed human rights issues on an annual basis.	<p>Reporting on human rights engagements is carried out on a quarterly basis, via Robeco reporting. Annually, human rights engagement is reported through the Stewardship Code Report.</p> <p>Any relevant human rights engagements are also reported on a quarterly basis via the quarterly RI reports.</p>	●
<b>Implementation of strategy</b>			
8.1, 8.3	<p>WPP expects that the Investment Managers employed to manage WPP assets will take account of ESG risks as part of their investment analysis and decision-making process. WPP further expects its Investment Managers to be able to demonstrate and evidence high standards with regards to their integration of RI considerations. Where necessary, WPP or its service providers, will engage with Investment Managers who fail to meet WPP's expectations to agree a plan to address any shortcomings.</p> <p>WPP will engage with its Investment Managers on an ongoing basis to ensure that ESG factors are transparently reflected in decision-making processes and that the approach taken to the management of ESG factors can be properly evidenced. WPP expects that such processes extend beyond</p>	<p>Waystone/ Russell, as part of their manager selection process already evaluate how managers integrate climate-related and other ESG risks into their decision-making.</p> <p>The RIWG is responsible for monitoring Russell and, where appropriate, the underlying Investment Managers on the extent to which they have integrated climate risk &amp; ESG consideration into the portfolios.</p> <p>The RIWG receives climate risk and ESG reports from their advisors, which monitor the activity of WPP's Investment Managers.</p>	●

	reliance purely on third-party ratings/data.		
8.2	WPP expects that, in all relevant circumstances, its Investment Managers will be signatories to the Principles for Responsible Investment and the Financial Reporting Council (FRC) UK Stewardship Code.	WPP receives an annual update from Russell on compliance of its underlying managers with market standards alongside Russell's own assessment of these managers. Details from this assessment are included in the Stewardship Code report.	●
<b>Stewardship, voting &amp; shareholder engagement</b>			
9.3	WPP will review the voting policy in conjunction with its V&E Provider, advisers, and Investment Managers on an annual basis.	<p>The WPP follows Robeco's Proxy Voting Policy, which is applied across all WPP's Active Equity Sub-Funds. WPP reviewed the Robeco House voting policy during the year and determined that this remains aligned with the WPP's objectives.</p> <p>WPP has now integrated a set of Escalation Principles into its approach, in conjunction with its investment managers and V&amp;E Provider.</p>	●
9.4	WPP will engage with its passive Investment Manager and V&E Provider to consider how WPP's Voting Policy can be extended to assets managed by its passive Investment Manager.	<p>The launch of a new passive fund is expected in 2025. Part of the review of the passive funds has been the incorporation of the Robeco infrastructure in applying WPP's Stewardship Policy.</p> <p><b><i>Path to green: incorporate WPP's voting infrastructure on the passive funds, where available</i></b></p>	●
9.5	WPP will receive reporting on all voting activity, including details of any votes that have not been cast and explanations where votes have not been cast, in accordance with the agreed principles on a quarterly basis. WPP will discuss any issues of concern with its V&E Provider, Investment Managers or other delegates as necessary.	<p>Quarterly voting reports are received from Robeco. A review of the voting reports is undertaken and matters of interest discussed by the RIWG.</p> <p>The WPP has regular dialogue with Robeco on voting matters and Robeco regularly present to WPP Committees.</p> <p>WPP also actively engages with Robeco prior to</p>	●

		any significant votes and considers how these are taken in line with LAPFF recommendations. Robeco sends information on any significant votes, including the voting rationale, ahead of general meetings.	
9.6	All the Constituent Authorities, as well as WPP itself, are members of the Local Authority Pension Fund Forum (LAPFF). As members, the Constituent Authorities receive LAPFF voting alerts, directed at particular issues or issuers, on an ongoing basis. WPP has instructed its V&E Provider to consider the substance of the voting alert before casting votes on behalf of the WPP. While the V&E Provider retains responsibility for the final decision on any vote. Where a vote cast is out of line with the LAPFF voting alert, the WPP requires its V&E Provider to provide an explanation of the difference.	WPP sends all voting alerts to Robeco as standard. Any divergence between LAPFF voting alerts and Robeco voting intention is explained in WPP's quarterly RI reports. Any significant divergence is discussed at the RIWG, whose Terms of Reference is currently under review to enable voting-instruction decisions to be made by the Sub-Group.	●
9.7, 9.8	<p>WPP will receive a report on all engagement activity undertaken by the V&amp;E Provider on a quarterly basis. WPP will discuss any issues of concern with the V&amp;E Provider.</p> <p>WPP will receive reporting on any engagement undertaken by its Investment Managers on an annual basis. This includes within the private-market investment programmes.</p>	<p>WPP receives reporting on engagement activity on a quarterly basis.</p> <p>WPP raises any issues of concern with other managers as necessary, including passive funds.</p> <p>WPP expects to receive stewardship reports on at least an annual basis from its private-markets Investment Managers.</p> <p>Case studies are included in WPP's annual Stewardship Code report.</p>	●
<b>Collaboration</b>			
10.1	In conjunction with its V&E Provider, WPP will continually assess potential collaboration opportunities, and will inform and seek input from the CAs on any such opportunity that it deems to be relevant.	<p>Work on collaboration opportunities is generally undertaken through Robeco, Russell and LAPFF.</p> <p>There is currently no formal mechanism for identifying collaboration opportunities. Instead, these are discussed when relevant at the RIWG.</p> <p>WPP may wish to consider whether a formal process is needed.</p> <p><b><i>Path to green: provide a forum at the RIWG to consider collaboration opportunities</i></b></p>	●

10.3	In conjunction with its V&E Provider, WPP will seek to identify investor-led RI initiatives and collaborations that can be actively supported.	While there is no formal mechanism for identifying collaboration opportunities, during the year, WPP signed up to the Investor Statement to Governments on the Climate Crisis. WPP also participated in an institutional investor letter to bp ahead of its capital-markets day and general meeting.	●
10.4	WPP will encourage underlying Investment Managers to participate in or support collaborative engagements where it is deemed to be in the best overall financial interests of Constituent Authorities.	<p>WPP has actively discussed their participation in collaborative engagements during the year with both BlackRock and Russell IM.</p> <p>However, there is currently no formal mechanism for identifying collaboration opportunities that Investment Managers should participate in. Instead, these are discussed when relevant at the RIWG.</p> <p>WPP may wish to consider whether a formal process is needed.</p> <p><b><i>Path to green: provide a forum at the RIWG to consider collaboration opportunities, with relevant opportunities raised with Investment Managers</i></b></p>	●
<b>Securities lending</b>			
11.2	To ensure the full application of its voting rights, as far as is practicable, WPP will recall all stocks on loan prior to any meeting at which voting rights may be exercised across the active equity Sub-Funds in scope.	The stock-recall service has been in place since end-2023, meaning that stock will be automatically recalled on all the equity Sub-Funds in scope – noting stock-lending is not applied to the Sustainable Active Equity Sub-Fund (SAE) – to allow WPP to vote all its positions at A general meetings.	●
<b>Monitoring, Reporting and Measurement</b>			
12.1	In consultation with Constituent Authorities, service providers and Investment Managers, WPP has developed appropriate monitoring metrics for existing investments and will continue to agree appropriate metrics in respect of all new investments. Such metrics include climate-related exposures. WPP will require Investment Managers to include such metrics in their quarterly reporting to Constituent Authorities.	<p>The RI Sub-Group has established a process for receiving Sub-Fund ‘deep dive’ ESG and climate risk reports, provided by its adviser. These reports have been updated to include scope 3 climate data, as well as more forward-looking data (as noted in 4.3, above).</p> <p>WPP receives quarterly reporting from Russell on a quarterly basis, which includes climate and ESG risk metrics, for all Russell-managed Sub-Funds; Fidelity also provides ESG monitoring for the Sterling Credit Sub-Fund (the only non-Russell-managed listed Sub-Fund). The SAE incorporates additional reporting, including on</p>	●



		<p>net-zero alignment, engagement on financed emissions and on UN SDG alignment.</p> <p>A quarterly RI report (by Sub-Fund) is produced, accessible for pension committees, and includes a number of monitoring metrics.</p> <p>The climate-focus list reports give additional metrics, including around nature.</p> <p><b>WPP should consider future reporting around scenario analysis.</b></p>	
12.3	WPP requires that the RI credentials of all appointed Investment Managers are subject to annual review. In conjunction with the relevant parties, the WPP will develop an appropriate reporting framework for its Investment Managers.	<p>Waystone/ Russell, as part of their manager selection process, evaluate how managers integrate RI considerations into their decision making.</p> <p>WPP receives regular updates from its investment managers on performance and RI issues. This is reported on within the Stewardship Code Report.</p> <p>The private-markets framework looks at the RI credentials of the underlying managers for each of those programmes.</p>	●
12.4	On an annual basis, the WPP will prepare and publish a report detailing the actions undertaken in fulfilment of this policy and the results achieved, following the principles of the 2020 FRC UK Stewardship Code.	<p>WPP completed a stewardship report for the year to 31 March 2024, which was submitted to the FRC in October 2024 and published in February 2025.</p> <p>WPP has retained its UK Stewardship Code signatory status.</p>	●
<b>Other</b>			
13.1	WPP will ensure there is at least one formal training session directly focused on RI.	<p>During 2024/25, WPP received the following RI training:</p> <ul style="list-style-type: none"> <li>• Impact &amp; levelling up</li> <li>• RI Policies</li> <li>• Net-zero journey-planning and climate metrics</li> <li>• What RI means for the WPP</li> <li>• Stock lending</li> <li>• JGC Members training: engagement and escalation</li> </ul> <p>WPP has produced a 25/26 training plan that includes the following RI subjects:</p> <ul style="list-style-type: none"> <li>• Local and impact investment within private markets</li> </ul>	●

		<ul style="list-style-type: none"> <li>• Voting &amp; engagement</li> <li>• Stewardship Code and reporting requirements</li> <li>• Biodiversity and natural capital</li> <li>• Climate scenarios and fiduciary duty</li> </ul>	
11.4	WPP will review the adherence of all parties to this policy on an annual basis. WPP will publish the results of their assessment in a public report.	<p>The WPP's annual Stewardship Code report acts as the WPP's RI stewardship and governance report.</p> <p>The annual climate report also considers this from a climate perspective specifically.</p> <p>This review also meets the requirements of this commitment.</p>	●

## Appendix 2: Progress against Climate Policy commitments

RAG key:

Policy expectations have been met

Policy expectations have been partially met; steps to green are outlined

Policy expectations have not been met

Ref	Commitment/ Policy Statement	Update/ Comment	RAG Status
<b>Oversight</b>			
7	This policy will be reviewed by WPP on an annual basis and, if necessary, changes to the policy will be proposed to and agreed by the JGC and OWG. As part of the annual review process, WPP will take account of the evolving risk to and requirements of the Constituent Authorities.	The RIWG, OWG and JGC members have had a number of discussions during the year on how to best meet the climate objectives of the CAs. This includes in terms of investment offerings, climate beliefs and objectives, and reporting.	●
<b>Objectives</b>			
13	The WPP's role is to consult with each CA in relation to their climate objectives, on at least an annual basis, and to fully understand what implementation solutions they require to meet their objectives and commitments.	CAs are consulted regularly through the RIWG around their climate ambitions. WPP has had individual meetings with each CA to understand their RI objectives during the year, including as this relates to climate.  Impact and natural capital have been highlighted as potential areas of focus during 2025/26.	●
14	Following its consultation with each CA, the WPP will endeavour to develop and facilitate investment solutions that enable each and every CA to achieve their climate objectives and commitments.	During 2024/25, WPP appointed managers to launch three real estate buckets, including an impact programme, which are due to launch in 2025.  Further progress was also made on: <ul style="list-style-type: none"> <li>• Sustainable fixed income</li> <li>• Evolution of the passive mandates</li> <li>• Natural capital</li> </ul> Areas of focus for 2025/26: <ul style="list-style-type: none"> <li>• Impact and local investment</li> </ul>	●
15	Where possible, the WPP, and its CAs, will seek to collaborate to develop investment solutions that meet the climate objectives and commitments of all the CAs.		

16	If unified and collaborative investment solutions that simultaneously meet the objectives and requirement of all CAs cannot be developed, the WPP will work with any CA to develop tailored investment solutions that will enable them to achieve their own local objectives and requirements.		
18	On an annual basis, WPP will assess whether its consultation exercise with the Constituent Authorities has identified a common climate-related objective that all Constituent Authorities are willing to support. If unanimous support can be obtained, from all eight Welsh Constituent Authorities, WPP will seek to adopt this climate-related objective as WPP's 'Climate Goal' and incorporate it across all WPP investments, as far as is practicable, acknowledging the potential difficulty in doing so on the passive mandates and within illiquid markets.	While WPP has not yet agreed a collective climate goal, the RIWG has discussed collective climate ambition and has agreed to report on an annual basis in line with the Task Force on Climate-related Financial Disclosures (TCFD). WPP has had individual meetings with each CA to understand climate ambition more generally.  <b><i>Path to green: continue to discuss climate ambition with CAs and how this can be implemented (in collaboration with Investment Managers)</i></b>	●
19	WPP's Climate Goal will be regularly reviewed, following consultation with the Constituent Authorities, and will always be driven by the collective requirements and objectives of the Constituent Authorities. If WPP's consultation exercise with the Constituent Authorities fails to identify a common climate-related objective that all Constituent Authorities are willing to unanimously support, then no WPP Climate Goal will be formulated until there is unanimous support for a given Climate Goal.		
20	To facilitate future discussion and consensus-building on climate generally, including on a common Climate Goal, WPP will develop a Climate Framework. The Climate Framework will include a common taxonomy and common basis for setting climate targets. This will support future product development, policy evolution and reporting to be addressed in a consistent manner. This will also allow WPP to assess its existing funds (active and passive, listed and private) against the Climate Framework to facilitate evolution where appropriate.	The Climate Framework has been shared with the RIWG and OWG, and has been used to guide updated reporting (including in terms of asset alignment). The Framework will evolve with best practice and inform discussions around climate with WPP's service providers.	●

Investment strategy			
22	<p>Recognising its current investment arrangements and offerings, WPP's immediate focus will be on climate-related-risk exposure within its equity and fixed-income holdings. WPP will consider climate-related risks in other asset classes when circumstances allow or require them to do so. WPP will endeavour to provide climate solutions across investment products, including private-market assets and passive mandates.</p>	<p>Climate-risk exposure is monitored and considered across all WPP's Sub-Funds, with Russell tracking climate risk across the Sub-Funds it manages for WPP. Net-zero alignment is specifically tracked within the SAE. The climate &amp; ESG risk reports highlight both forward- and backward-looking climate metrics across Sub-Funds, including alignment.</p> <p>In its private-market appointments, sustainability considerations were also integrated, including an expectation for providers to facilitate investment in climate solutions, and a specific fund dedicated to impact and local investments in real estate.</p>	●
23	<p>WPP recognises the importance of monitoring exposure to climate-related risks in different ways. Understanding exposure to climate solutions is also beneficial in understanding investment needs to meet climate goals. One way WPP facilitates this is by monitoring exposure to a number of climate-related attributes for each Sub-Fund to ensure that the Constituent Authorities have all available information at their disposal.</p>	<p>Climate and ESG risk reports are provided by WPP's advisor for all WPP Sub-Funds on at least an annual basis. WPP reports on climate exposures (risk, solutions and alignment) for each of the listed Sub-Funds (except the Global Government Bond Fund) on a quarterly basis.</p> <p>Russell tracks the carbon-risk exposure of each Sub-Fund within the quarterly reports it provides WPP.</p> <p>Climate reporting is also provided by the private-markets managers.</p> <p>Climate exposures at the Wales-wide level were reported on through the AWCR. This exercise will be carried out triennially, with a Pool-level report (in line with potential TCFD reporting requirements for the LGPS) being made available in the interim years. The first Pool-level report was finalised during the year.</p>	●
24	<p>WPP will endeavour to facilitate climate-scenario analysis across assets held within WPP to ensure that the Constituent Authorities are aware of the potential climate exposures within WPP's investments.</p>	<p>The AWCR considered transition alignment across all assets held within Wales. The quarterly climate &amp; ESG risk reports also consider asset alignment (using the Net Zero Investment Framework, as well as alignment metrics such as implied temperature rise). Russell IM conducts climate scenario</p>	●

		analysis across the Sub-Funds it manages for WPP. The SAE specifically reports on the portfolio's net-zero alignment.  <b><i>Path to green: consider incorporating scenario analysis into annual climate reporting</i></b>	
25	WPP has committed to hosting at least one annual climate-related training session for its stakeholders. WPP carries out an annual training-needs identification exercise, in conjunction with the Constituent Authorities; this is the mechanism by which WPP gauges the climate-related-training requirements of its stakeholders.	There were multiple training sessions on RI held during the year. This included training on TCFD for the LGPS.  A training needs assessment was undertaken for the 2024/25 year, with training on Climate Risk Policy to take place in Q3 24, as well as a session on net-zero journey planning and climate metrics, to take place in TCFD reporting due to take place in Q4 24.	●
<b>Implementation</b>			
27	WPP expects its Investment Managers to ensure that all underlying active managers integrate the consideration of climate-related risks into their investment process and to regularly challenge underlying managers to evidence their approach.	WPP has engaged with Russell during the year to understand its approach to the management of climate risk, including the metrics and tools it uses to do so.  Russell has delegated responsibility for the oversight of the underlying investment managers employed and their approach to climate risk management.	●
28	WPP will work with its Investment Managers to ensure that they account for and integrate climate-related risks into their investment processes.	WPP has engaged with Russell during the year to understand its approach to the management of climate risk, highlighting the metrics and tools it uses to do so (including a demo). Russell has advised that a client version of its in-house PARIS tool – which aggregates data from such external providers as MSCI and Sustainalytics – will be available shortly.  Russell has delegated responsibility for the oversight of the underlying investment managers employed and their approach to climate-risk management.	●
29	WPP's stewardship strategy is set out in its Responsible Investment and Stewardship Policies. WPP will emphasise the	WPP's stewardship theme 'Focusing on Net Zero' is integrated across a number of Robeco's engagement themes implemented	●

	importance of engagement on climate-related risks and opportunities primarily through its V&E Provider. In particular, WPP will encourage its V&E Provider to engage with investee companies in listed markets on climate-related issues, including disclosures on climate-related risks by companies to investors, and on the formulation and implementation of transition plans aligned with the goals of the Paris Agreement.	during the year (including on Net Zero Emissions; Climate and Natural Transition of Financial Institutions; Acceleration to Paris; and Just Transition).	
<b>Monitoring and reporting</b>			
31	WPP monitors exposure to climate-related risks and opportunities within its Sub-Funds on a quarterly basis. The metrics monitored include, but are not limited to, holdings with exposure to fossil-fuel reserves, carbon emissions carbon intensity, and exposure to climate solutions. WPP will monitor changes in market practice to ensure that WPP is fully aware of changing best practice. WPP will develop further monitoring of asset transition alignment.	The climate & ESG risk reports include a wide range of climate metrics, across both the equity and fixed-income Sub-Funds. The quarterly RI reports also monitor climate exposures across Sub-Funds. WPP completed its first Pool-level climate report, in line with the TCFD during the year, which will now be an annual output. A sub-set of issuers, which form part of WPP's climate-focus list, are reported on a quarterly basis, including backward- and forward-looking metrics, metrics on nature, and stewardship highlights.	●
32	In addition to its own reporting, WPP will require its Investment Managers to provide monitoring on climate-related exposures in their quarterly reports to WPP and the Constituent Authorities. As noted above, WPP expects its equity and fixed-income Investment Managers to provide this monitoring on a regular basis. WPP expects reporting on climate on at least an annual basis from its private-market managers, though recognises the data constraints that exist outwith listed markets. The expectation is that WPP's non-equity Investment Managers will provide any relevant information as soon as data/market developments allow.	Russell provides reporting on climate risk within its quarterly reports to WPP. The climate & ESG risk reports provided by WPP's adviser also monitors climate risk (and opportunity) across the Sub-Funds. Waystone also provides an annual TCFD report for the active Sub-Funds under the Waystone ACS.	●
34	WPP will assess and report progress on climate for all WPP-held assets on an annual basis, with a wider 'all-of-Wales' report to be conducted on a triennial basis. As far as is practicable, and as part of any regulatory	Currently, WPP is not required to report in line with the TCFD, though this is expected to commence in 2025. However, WPP completed its first Pool-level climate report	●

	obligations, such reporting should be in line with the requirements of the Task Force on Climate-related Financial Disclosures (TCFD). WPP will support the Constituent Authorities in their own TCFD reporting.	during the year, with an all-Wales version expected for 2025.	
<b>Stewardship</b>			
35	To facilitate stewardship around climate specifically, WPP will maintain a list of 'climate-focus' companies (across active and passive equity holdings) where stewardship activity will be explicitly scrutinised. Such a list will be comprised of those stocks within those materially impacted sectors (or those financing such) where there is the greatest climate risk or potential for change. This will help WPP: support oversight of voting practices on those issuers; further scrutinise engagement activity undertaken with those issuers; and assess (on an ongoing basis) the outcomes achieved.	The quarterly climate-focus report is shared with RIWG and OWG. Monitoring and reporting will continue to evolve as necessary.	●