WPP Annual progress update against policy commitments 2025/26

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. Over 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 2026. This review forms an element of the WPP's governance processes and will be formally reflected in the WPP's Stewardship Code report for 2026/27. This review was undertaken by Hymans Robertson on behalf of the WPP, for discussion with 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 all areas, progress has continued to be made against the policy commitments. In no areas has no progress been made over the year.

Highlights of the year

- Over 2025/26, WPP undertook considerable work in terms of its investments (details of which can be found in the Appendices), including:

    - finalising a new bespoke ESG strategy with its passive provider, the Aquila Life WPP World ESG Insights Fund, which launched at the end of 2025
    - supporting its first natural-capital (forestry) allocation, including an asset within Wales
    - progressing work with Russell IM on sustainably evolving the Global Credit Sub-Fund (the first such evolution within the fixed-income suite)
- WPP undertook a detailed review of its approach to exclusions, in close collaboration with its Partner Funds and service providers. The changes will see exclusions applied to investment in companies involved in:

    - the extraction/generation of power from thermal coal
    - the extraction of unconventional oil & gas reserves
    - involvement in the production of controversial weapons
    - companies in persistent breach of global norms

- The WPP submitted its fifth annual Stewardship Report, continuing to be a signatory to the 2020 UK Stewardship Code. The WPP also completed its second all-Wales Climate Report and work began on WPP's first nature report.

- On stewardship, WPP played an active role in both of Robeco's client panels over the year, with a number of engagement areas actively discussed. Robeco will launch three new themes in 2026, all three (out of a proposed five) of which WPP supported on the short list at the Active Ownership panel in November; two of which WPP actively put forward following stakeholder feedback: Responsible AI; Physical (climate) Resilience. The third theme to be launched is on EU Sovereign Climate Policy Engagement.

- For the first time, WPP co-filed a shareholder proposal (SHP), in conjunction with a number of other likeminded investors and led by the Australasian Centre for Corporate Responsibility. The SHP was presented to bp at the start of the year and focused specifically on the oil major’s plans to increase upstream capex, which appears out of line with the 2019 resolution and represents poor capital discipline. WPP felt that supporting the SHP was a natural escalation following the Pool’s support of the investor letter ahead of the capital-markets day last year.

Areas for future focus

In completing this assessment, we note the following potential areas for activity/improvement over 2026/27:

1 Climate & nature: WPP’s climate beliefs and ambitions are set out within its Climate and RI Policies, which have informed the considerable amount of work that has already been done in this area. Consideration should be given to how such ambitions will continue to be progressed through the WPP IMCo. While WPP’s climate reporting has evolved over this year, one area for further development will be in scenario analysis. WPP’s first nature report will be published in 2026, and it would be beneficial to understand how climate and nature reporting can be streamlined.

2 Stewardship: monitoring the implementation of the exclusions policy and continuing to embed the escalation principles, in collaboration with service providers.

3 Collaboration: while these have taken place organically over the year (including the first SHP co-file), given the policy commitment, WPP may wish to consider formalising the process for collaborative stewardship.

4 Working with IMCo: we believe one of WPP’s unique strengths is the level of collaboration that exists between all of the Pool’s underlying partner funds, without which we would not have seen such progress in our RI journey to date. Recognising the forthcoming changes in governance arrangements, this strength will continue in working together with the new WPP IMCo.

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For and on behalf of Hymans Robertson LLP

June 2026

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
Investment Strategy			
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.	Over 2025/26, WPP finalised work on a new bespoke ESG strategy with its passive provider, which launched at the end of 2025. WPP also supported its first natural-capital allocation (see below) and work progressed with Russell IM on sustainably evolving the Global Credit Sub-Fund (the first such evolution within the fixed-income suite).	●
3.4	In conjunction with its advisers, the WPP will also consider opportunities arising from a greater understanding of ESG factors. These opportunities could include local (Wales) opportunities, 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.	WPP supported allocations by a number of its partner funds to a natural-capital (forestry) fund managed by Gresham House. While the majority of the portfolio's assets are located within Scotland, there are also assets local to Wales, including Brycheiniog. In addition, within the private-credit programme, managed by Russell IM, WPP made specific allocations to Pluto Finance, focusing on affordable housing, including with specific projects within Wales.	●
Climate change			
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. Through this, WPP aims to provide support to Constituent Authorities in developing and implementing their own climate-management policies.	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 its private-markets	●

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		managers. WPP published its second all-Wales Climate Report in 2025. This provided both an update on progress made since the previous report and expanded the criteria against which activity has been assessed and reported.	
4.4	WPP will encourage, through its service providers and delegates, all investee companies to disclose in line with the requirements of the Task Force on Climate-related Financial Disclosures (TCFD).	Engagement activity is carried out via Robeco and Russell. WPP has highlighted this requirement to Robeco through its stewardship themes. Russell-specific (direct or co-lead with Sub-Advisors) engagement theme: Climate Change Resilience. Russell collaborative engagements via Sustainalytics: Net-Zero Transition 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; Ocean Health; Transition Minerals.	Green
Nature			
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.	Green
Human rights			
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.	As its Voting & Engagement Provider, WPP’s engagement is carried out mainly via Robeco. Over the year, Robeco engaged in a number of human rights-focused themes: • Sound social management • Human rights due diligence in conflict-affected and high-risk areas (CAHRAs) • Just transition in emerging markets • Modern slavery in supply chains • Global controversy engagement • SDG engagement	Green

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		To note, the theme specifically focusing on CAHRAs was due to close last year; however, Robeco has chosen to extend, given client (including WPP) feedback at the active-ownership event and also given escalation in the number of conflicts globally. On the investment side, as part of the exclusions policy developed over the year, WPP will exclude companies in persistent breach of global norms (which includes breaches of international humanitarian law). WPP will work with its providers to develop its methodology in this area. Further, as part of the escalation policy, we note that issues with individual companies may be escalated if there are areas of concern. Escalation measures include writing to the company, engagement, voting sanctions, proposing shareholder resolutions. All of these would be considered ahead of any decision to divest, although divestment is an option within the Stewardship Policy (though only where this is in the best fiduciary interests of investors).	
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.	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. Any relevant human rights engagements are also reported on a quarterly basis via the quarterly RI reports.	●
Exclusions			
7.3	WPP will delegate the implementation of its exclusions policy to its Investment Managers and will monitor compliance with the implementation rules on an ongoing basis.	Over the last 12 months, the WPP has undertaken a detailed review of its approach to exclusions, recognising the goals of its Partner Funds. The changes will see exclusions applied to investment in companies involved in: • the extraction/generation of power from thermal coal; • the extraction of unconventional oil & gas reserves; • involvement in the production of controversial weapons; and • companies in persistent breach of	●

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		global norms. WPP has worked with its Investment Managers and other providers to develop internal processes and rules to govern the scope and application of this exclusions policy. And we are currently working with WPP's Investment Managers to agree an appropriate window (expected to be approx. three months) over which the policy should be implemented thereafter. The RI Policy was updated to reflect such changes in March 2026, and we are now awaiting implementation.	
7.4	WPP will report on its compliance with this policy to Constituent Authorities on a quarterly basis.	Awaiting implementation.	N/A
7.5	WPP will consult with its Investment Managers and other stakeholders with a view to extending the scope of this policy.	Awaiting implementation.	N/A
Implementation of strategy			
8.1, 8.3	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. 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 reliance purely on third-party ratings/data.	Waystone/ Russell, as part of their manager selection process already evaluate how managers integrate climate-related and other ESG risks into their decision-making. The RIWG is responsible for monitoring Russell and, where appropriate, the underlying Investment Managers on the extent to which they have integrated climate risk & ESG consideration into the portfolios. The RIWG receives climate risk and ESG reports from their advisors, which monitor the activity of WPP's Investment Managers. In addition, within the escalation policy, where there are concerns about individual issuers, particularly around the breach of global norms, WPP will escalate such concerns to its Investment Managers for input.	

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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.	●
Stewardship, voting & shareholder engagement			
9.3	WPP will review the voting policy in conjunction with its V&E Provider, advisers and Investment Managers on an annual basis.	The WPP follows Robeco's Proxy Voting Policy, which is applied across all WPP's Active Equity Sub-Funds (and the Aquila Life WPP World ESG Insights Equity Fund). WPP reviewed the Robeco House voting policy during the year and determined that this remains aligned with the WPP's objectives. WPP has now integrated a set of Escalation Principles into its approach, in conjunction with its investment managers and V&E Provider.	●
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.	The Aquila Life WPP World ESG Insights Equity Fund launched at the end of 2025, with the WPP Stewardship Policy directly applied (including voting).	●
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.	Quarterly voting reports are received from Robeco. A review of the voting reports is undertaken and matters of interest discussed by the RIWG. The WPP has regular dialogue with Robeco on voting matters and Robeco regularly presents to WPP Committees. WPP also actively engages with Robeco prior to 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	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 and may be escalated to the OWG.	●

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	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.		
9.7, 9.8	WPP will receive a report on all engagement activity undertaken by the V&E Provider on a quarterly basis. WPP will discuss any issues of concern with the V&E Provider. WPP will receive reporting on any engagement undertaken by its Investment Managers on an annual basis. This includes within the private-market investment programmes.	WPP receives reporting on engagement activity on a quarterly basis. WPP raises any issues of concern with other managers as necessary, including passive funds. WPP expects to receive stewardship reports on at least an annual basis from its private-markets Investment Managers. Case studies are included in WPP's annual Stewardship Code report.	
Collaboration			
10.1 10.3	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. In conjunction with its V&E Provider, WPP will seek to identify investor-led RI initiatives and collaborations that can be actively supported.	Work on collaboration opportunities is generally undertaken through Robeco, Russell and LAPFF. There is currently no formal mechanism for identifying collaboration opportunities. Instead, these are discussed when relevant at the RIWG. While the AGM took place following year-end, WPP was part of a group of investors that co-filed a shareholder proposal (SHP) at bp. The SHP focused specifically on bp's plans to increase upstream capex, which appears out of line with the 2019 resolution and represents poor capital discipline. We felt supporting the SHP to be a natural escalation following WPP's support of the investor letter ahead of bp's capital-markets day last year; and WPP worked with the Australasian Centre for Corporate Responsibility on the co-file. WPP also participated in the Public Investor Statement on Methane to the EU, in collaboration with Robeco and other investors, has signed the Public Investor Statement on Methane to the EU Commission. WPP also maintains dialogue with third-sector organisations specific to Wales, including Friends of the Earth Cymru and Size of Wales.	

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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.	WPP has actively discussed collaborative engagements over the year with Russell IM. 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 and OWG. **WPP may wish to consider whether a formal process is needed.**	
Securities lending			
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 general meetings.	
Monitoring, reporting and measurement			
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.	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. 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 net-zero alignment, engagement on financed emissions and on UN SDG alignment. A quarterly RI report (by Sub-Fund) is produced, accessible for pension committees, and includes a number of monitoring metrics. WPP conducts an annual climate report and nature report.	
12.2	WPP will assist Constituent Authorities with the gathering of data and preparation of reporting in line with the requirements of the TCFD framework.	To date, only one CA has requested data to aid in its TCFD reporting. However, WPP provides climate data on an annual basis as part of its own annual climate reporting.	

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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.	Waystone/ Russell, as part of their manager selection process, evaluate how managers integrate RI considerations into their decision making. WPP receives regular updates from its investment managers on performance and RI issues. This is reported on within the Stewardship Code Report. The private-markets framework looks at the RI credentials of the underlying managers for each of those programmes.	
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.	WPP completed a stewardship report for the year to 31 March 2025, which was submitted to the FRC in October 2025 and published in January 2026. WPP has retained its UK Stewardship Code signatory status.	
Other			
13.1	WPP will ensure there is at least one formal training session directly focused on RI.	During 2025/24, WPP received the following RI training: • Local & impact investment within private markets • Stewardship Code and reporting requirements • Biodiversity and natural capital • Climate scenarios and fiduciary duty	
13.3	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.	The WPP's annual Stewardship Code report acts as the WPP's RI stewardship and governance report. The annual climate report also considers this from a climate perspective specifically. Upcoming annual nature and impact reporting will further support such assessment. This review also meets the requirements of this commitment.	

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
Oversight			
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 over 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. For example, approved from April 2025, a new climate objective was added, acknowledging the part nature resilience plays in climate mitigation and adaptation. We also extended our commitment to identifying climate risks in the development of new WPP investment products, by acknowledging the need to also identify climate opportunities; with both lenses then applied to both new and existing investment products.	●
9	In maintaining and acting on this policy, WPP will have an ongoing dialogue with its Operator, Investment Managers, Voting and Engagement Provider (V&E Provider) and Oversight Advisor, as well as WPP's Constituent Authorities, in whose interest investments are made. The WPP will also seek input from third parties where appropriate.	Two major pieces of work were completed in regard to climate over the year: 1. The development of the Aquila Life WPP World ESG Insight Fund, which has specific climate characteristics; including around green-revenue targets, carbon emissions reductions and temperate-rise targets; exclusions are also applied, around thermal coal and unconventional oil & gas.	

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		2. A WPP-wide exclusions policy, which excludes investment in companies involved in: • the extraction/generation of power from thermal coal • the extraction of unconventional oil & gas reserves In addition, WPP worked with its Investment Manager Russell IM in the sustainable evolution of the (Russell-managed) fixed-income Sub-Funds.	
Beliefs			
10.5	It is incumbent on WPP to identify potential sources of climate-related risks (and opportunities) in the development of and continued investment in any WPP investment solution, as well as in the procurement of any service provider. WPP will seek to ensure that such risks and opportunities are appropriately managed and communicated to Constituent Authorities.	As indicated in 9 above, climate (risk and opportunity) was a key consideration in the work done within the new passives solution, as well as the exclusions policy. Generally, in the procurement of any provider, including within the private-markets asset classes, WPP's climate aspirations are communicated.	
Objectives			
13	WPP's role is to consult with each Constituent Authority 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. The Gresham House forest fund was initially discussed among CAs at the RIWG and progressed within the individual pension committees.	
14	Following its consultation with each Constituent Authority, WPP will endeavour to develop and facilitate investment solutions that enable each and every Constituent Authority to achieve their climate objectives and commitments.	As reported above, specific work carried out over the year included: • Aquila Life WPP World ESG Insights Fund • Gresham House forest fund	

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15	Where possible, WPP and its Constituent Authorities will seek to collaborate to develop investment solutions that meet the climate objectives and commitments of all the Constituent Authorities.	• Exclusions policy • Sustainable fixed income	
16	If unified and collaborative investment solutions that simultaneously meet the objectives and requirements of all the Constituent Authorities cannot be developed, WPP will work with any Constituent Authority 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.	WPP has not yet agreed a collective climate goal. However, as evidenced above, this has not diminished the work generally carried out within individual investment arrangements, and overall oversight and reporting. All of which align with the ambitions and beliefs of the Climate Policy. **WPP continues to undertake work on the climate transition, and this is reflected in both its investments and its stewardship. As part of the transition to the WPP IMCo, WPP should outline its climate beliefs and objectives, so that this shared objective continues.**	
19	WPP's Climate Goal, including any intermediate or related targets, will be regularly reviewed, following consultation with the Constituent Authorities. Such a goal 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	The Climate Framework has been used to guide both quarterly and annual reporting (including the all-Wales Climate Report and	

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	has developed a Climate Framework. The Climate Framework includes a common taxonomy and 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.	Nature Report). The Framework was also used as part of the development of the new passives fund and in the work on exclusions.	
Investment strategy			
22	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.	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. The climate & ESG risk reports highlight both forward- and backward-looking climate metrics across Sub-Funds, including alignment. Last year's annual climate report also included three of the BlackRock passive-equity funds. We collect climate data on the private-markets programmes, where this is available. To note, this is received on an annual basis and is generally more limited than in the listed space.	●
23	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. WPP receives regular Climate and ESG Risk Reports for its Equity and Fixed-Income Sub-Funds. WPP will continue to explore and investigate market developments that enhance its ability to assess climate exposures within its	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. Russell tracks the carbon-risk exposure of each Sub-Fund within the quarterly reports it provides WPP. Climate reporting is also provided by the private-markets managers. Climate exposures at the Wales-wide level are reporting through the annual climate report (either the all-Wales Climate Report,	●

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	investment products, including private-market assets.	which was completed in 2025, or a Pool-level-only report).	
24	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.	WPP's reporting considers forward-looking climate analysis, including transition alignment, implied temperature rise, and includes NZIF alignment; however, WPP has not yet carried out any climate-scenario analysis. **WPP should consider future reporting around climate-scenario analysis, which incorporates qualitative models and real-world scenarios, and tipping points.**	Amber
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 climate scenarios. Case studies on how climate is integrated into two of the private-markets assets classes were also discussed as part of wider local & impact training. An annual training-needs assessment is carried out with the CAs to determine areas of focus.	Green
Implementation			
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.	Green
28	WPP will work with its Investment Managers to ensure that they account for and integrate climate-related risks into their investment processes.	WPP's Oversight Advisor engages with Russell on at least a quarterly basis. As part of those dialogues, we have specifically discussed how they are resourcing their approach to climate (personnel; tools; data; research; net-zero modelling. As above, WPP also worked directly with Russell IM on WPP's exclusions policy.	Green

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		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 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.	WPP's stewardship theme 'Focusing on Net Zero' is integrated across a number of Robeco's engagement themes: • Net Zero Carbon Emissions (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 • Ocean Health • Transition Minerals Russell IM also engages with investee companies on WPP's behalf (as a firm directly or in collaboration with its Sub-Advisors, or via Sustainalytics): • Russell-specific (direct or co-lead with Sub-Advisors) engagement theme: Climate Change Resilience. • Russell collaborative engagements via Sustainalytics: Net-Zero Transition	●
Monitoring and reporting			
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 and 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 also undertakes an annual climate report in line with the TCFD. A sub-set of issuers, which form part of WPP's climate-focus list, are reported on, including backward- and forward-looking metrics, metrics on nature, and stewardship highlights.	●

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32	In addition to its own reporting, WPP will require its Investment Managers to provide monitoring on climate-related exposures in their regular 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 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 climate (including TCFD) reporting.	Currently, WPP is not required to report in line with the TCFD. However, WPP now produces an annual climate report; this year was the triennial all-Wales Climate Report.	
Stewardship			
35	WPP's approach to stewardship generally (including climate stewardship) is outlined in its Stewardship Policy. To facilitate stewardship around climate specifically, WPP will maintain a list of 'climate-focus' companies (initially 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	The climate-focus report is shared with the RIWG. Monitoring and reporting will continue to evolve as necessary.	

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	issuers; and assess (on an ongoing basis) the outcomes achieved.		