St James's Place

Sustainability Report

St. James's Place Unit Trust Group - 1 July 2024 to 30 June 2025

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01 Our introduction

Welcome to our very first sustainability report, which sets how we implement responsible investing within our unit trust business, and outlines the priorities we have identified to further develop our approach. We believe that integrating environmental, social and governance (ESG) considerations can meaningfully improve investment outcomes for our clients. Understanding future ESG risks and opportunities helps us ensure our clients' investments perform resiliently in changing market conditions.

At St. James's Place, we operate as a group of companies. St. James's Place plc is the Group's parent company. This report has been prepared to fulfil the FCA's Sustainability Disclosure Requirements for authorised fund managers. Therefore, it covers the Unit Trust Group (UTG) subsidiary only. You can find more information about our Group's offering here.

St. James's Place plc
London Stock Exchange listed entity

St. James's Place Unit Trust Group Ltd
Authorised fund manager responsible for our unit trust funds

The directors of the SJPUTG are known as 'the SJPUTG Board' which oversees all aspects of our investment process. This includes how ESG factors are being managed to ensure we deliver good outcomes for clients through:

Our responsible investment approach

We expect our investment managers to integrate ESG risks and opportunities when they invest our clients' assets, and when they engage with the companies in which they invest. This ESG integration is standard across our funds. The SJPUTG Board oversees our approach and formally adopts our responsible investment policy. More information on how we implement responsible investment in practice can be found on pages 14 - 15.

Our investment proposition and the range of funds we offer clients

Our product framework covers the initial design, monitoring and review of our funds. This includes ensuring funds are well positioned for their target market and clients' preferences, including those related to ESG.

Environmental

Climate | Fossil fuels | Water management | Nature and biodiversity | Pollution and waste

Social

Human rights | Modern slavery | Social media | AI and big data | Cyber security

Governance

Inclusion and diversity | Remuneration | Systemic issues | Legal and regulatory standards | Anti-corruption and anti-bribery

The value of an investment with St. James's Place will be directly linked to the performance of the funds selected and may fall as well as rise. You may get back less than the amount invested.

Where we are

We are committed to investing responsibly and are proud of the progress we have made so far. Over the past five years, we have developed our responsible investment approach which we believe is robust, and well placed, to deliver good financial outcomes for our clients.

Key milestones

2020

Joined Net Zero Asset Owners Alliance and set our target of achieving net zero across our investments by 2050.

100% of our investment managers are signatories to the Principles of Responsible Investing (PRI) which set a minimum standard of responsible investment across our managers.

2021

Increased the coverage of our engagement activities by appointing Robeco as our ESG engagement partner.

2022

Implemented our exclusions policy.

Became a signatory to the revised UK Stewardship Code.

2024

Released our first TCFD Product Report which includes climate scenario modelling and climate metrics for our funds.

2025

Made changes to our Sustainable & Responsible Equity fund which adopted a UK 'Sustainability Focus' label.

Set our second interim target to achieve a 50% carbon reduction across our investments by 2030 (versus 2019 baseline).*

**Commitment is inclusive of listed equity, publicly available corporate debt, and real estate. This is approximately 85% of our unit trust funds under management (FuM) as at 30 June 2025. Carbon reduction targets are based on weighted average carbon intensity and are measured against a 31 December 2019 baseline year.*

Looking ahead

Our approach to climate change is more developed than other areas of ESG. This reflects our stance that it is a priority area of focus within our wider responsible investment approach. In 2025, we set our second interim target to achieve a 50% carbon reduction across our investments by 2030 (versus 2019 baseline).* We achieved our initial interim target of a 25% carbon reduction by 2025, ahead of schedule.

Going forward, stewardship will be a key lever to help us achieve this goal. We already monitor our investment managers' approach to climate change within their investment processes and their engagements with investee companies. More recently, we have started monitoring their macro stewardship processes. How are they trying to influence the wider industry and policy makers to push for more movement around climate policy?

In 2025, we will continue deepening our oversight of our investment managers' engagement activities. The climate transition will be the priority focus of these discussions.

Our risk management approach around human rights and labour issues will also be a focus going forward. Given our exposure to a high number of companies in our funds, investments have been identified as a potential high risk for modern slavery by the Group. We already monitor our managers to ensure that they have policies in place. If a manager does not have a policy, or we are not satisfied with their policy, we will escalate and discuss this further with them to ensure that their stance is appropriate and acceptable to us.

Alongside these developments, we will continue to hold our investment managers to account. We will ensure they meet our expectations around ESG integration and stewardship through our ongoing investment manager assessment and monitoring processes. We are committed to continuous development and transparently disclosing our activities and outcomes as they evolve over time.

More information and reporting can be found on our responsible investment webpage.

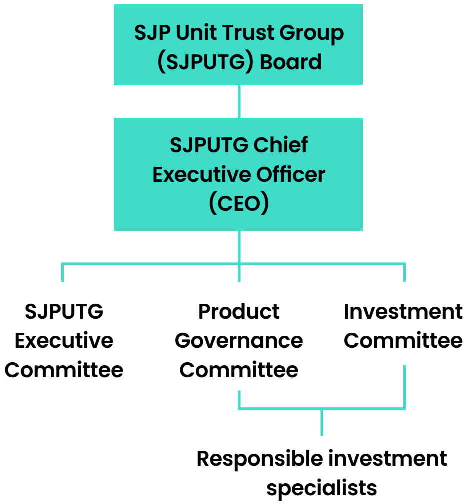
*Commitment is inclusive of listed equity, publicly available corporate debt, and real estate. This is approximately 85% of our unit trust funds under management (FuM) as at 30 June 2025. Carbon reduction targets are based on weighted average carbon intensity and are measured against a 31 December 2019 baseline year.

02 Our governance

We have a robust system of governance with accountability at all levels. This allows our executive leaders, senior leaders, and managers to integrate ESG risks and opportunities into our investment processes.

SJP Unit Trust Group Board ('the Board')

SJPUTG is the authorised investment manager of our unit trust fund range which consists of 45 funds spanning regions, asset classes, investment styles and outcomes.



Who is on the SJPUTG Board?

It is a Financial Conduct Authority (FCA) requirement to have at least two independent directors overseeing the management of our funds. Our three non-executive directors provide constructive challenge to the Board and to the executive team. Tom Beal is the Board's executive director with responsibility for managing our funds.

The Board met six times during the year to 30 June 2025, and received updates throughout the year from our investment professionals on key issues. Regulation, including the FCA's Sustainability Disclosure Requirements, and TCFD reporting were reviewed and discussed by the Board on multiple occasions.

Its members are subject to SJP Group policies such as Inclusion and Diversity, Human Rights and Conflicts of Interest. Our corporate policies can be found on our ESG reporting hub.

What is the SJPUTG Board responsible for?

The Board oversees all aspects of our investment process. This includes how our investment managers consider ESG risks and opportunities when they invest our clients' assets. The Board formally adopts SJP's responsible investment policy after any material change and at least every two years. Our Approach to Responsible Investment Guide summarises this policy.

It also oversees other key reporting for our funds including our TCFD Product report and disclosures required under the FCA's Sustainability Disclosure Requirements.

SJPUTG Chief Executive Officer (CEO)

The SJPUTG CEO is responsible for the day-to-day management of the SJPUTG and is the accountable leader responsible for all decisions made by the committees outlined below. The scope of their responsibilities spans our investment teams including product, strategy, risk and operations. ESG considerations will feed into each of these areas with any decisions being made at the committee level and escalated to the CEO for approval where required.

SJPUTG Executive Committee

The Executive Committee is an advisory body which supports, advises and assists the SJPUTG CEO and the SJPUTG Board. It meets at least four times a year and includes representation from across investments, operations, risk and compliance. The Executive Committee provides feedback and challenge, drawing on its members' subject matter expertise to refine proposals and ensure their robustness ahead of presentation to the SJPUTG Board.

Product Governance Committee

Our Product Governance Committee oversees the end-to-end lifecycle (design, manufacture, and review) of our investment products and services.

For any product change, proposals discussed by the Committee will consider aspects of the product design such as target market, the fund's objective and Consumer Duty. Enhanced ESG considerations are embedded into fund proposals and ongoing reviews of sustainability products e.g. sustainability label oversight or additional supporting communication required to explain ESG concepts to clients.

The Committee receives regular updates on thematic and governance-related topics including responsible investment and regulatory developments. It is also responsible for product reporting such as our TCFD Product report, ahead of approval at the SJPUTG Board.

Over the year, the Committee oversaw the redesign of our Sustainable & Responsible Equity fund, which has adopted a UK 'Sustainability Focus' label under the FCA's Sustainability Disclosure Requirements. This is our flagship sustainable fund for clients that wish to go further than the ESG integration that is standard in our responsible investment approach.

Our governance continued...

Investment Committee

Our Investment Committee is responsible for overseeing the investment strategies, risks, and performance of our funds.

This includes investment activity outsourced to external investment managers and the construction of funds and portfolios. It is responsible for validating the responsible investment considerations embedded into our investment processes, including:

- advising on proposed changes to our exclusion policy
- reviewing the results of investment manager assessments and overseeing remedial action
- ensuring that responsible investment principles have been embedded into investment manager due diligence and analysis

The Investment Committee reviews and approves our responsible investment policy after any change and at least every two years. Over the year, it received updates on our annual responsible investment manager assessment, exclusions policy and stewardship oversight programme.

Responsible investment specialists

Our responsible investment specialists are subject matter experts within our investment research team. They set the strategic direction for, and implement, our responsible investment policy. Working with our asset class specialists, their investment manager research feeds into manager selection and monitoring decisions. Throughout the year, they report on developments and progress to various committees and the SJPUTG Board.

Our governance continued...

We may delegate certain activities, and rely on third-party services, to help us integrate ESG factors and stewardship into our investment processes. When we do this, our responsible investment specialists are accountable for the oversight and monitoring of providers.

Key delegations include:

Investment managers

We delegate the management of our funds to external investment managers who are subject to our responsible investment minimum standards (see page 14).

We expect them to integrate financially material ESG risks and opportunities into their investment processes. These factors can impact a company's future profitability and investment returns.

When selecting a new investment manager, an assessment of their approach to ESG integration is one of the criteria for their appointment. Investment managers are then monitored on an ongoing basis through:

- an annual responsible investment assessment
- meetings with our responsible investment specialists
- further engagement as and when required

These controls ensure we can deliver our strategy of investing our clients' money responsibly.

Third party engagement provider – Robeco

Engagement is a key part of our responsible investment approach. It is how we, and our investment managers, can encourage investee companies to address and capitalise on financially material ESG risks and opportunities, respectively.

Robeco engages directly with investee companies on a range of ~20 ESG themes on our behalf. We monitor the progress of its engagements through quarterly reporting and review its performance at least every three years. This monitoring ensures Robeco's work remains aligned with our responsible investment approach.

Data providers

We use third-party ESG data providers, primarily MSCI and BlackRock Aladdin, to measure the level of climate-related risks within our funds. This data also enables us to fulfil our reporting responsibilities in our annual TCFD Product report. It is also used for scenario analysis in our Group Climate Report.

As the landscape evolves, with data quality improving, better estimation models and increasing data coverage, it is important that our data sources remain robust and credible. Our responsible investment specialists review our data providers periodically to ensure they remain fit for purpose and in line with peers and the wider industry in their approach and offering.

Other service providers

We may also use other third-party services such as consultants, market researchers and data providers to provide additional support and subject matter expertise. We use these resources on an ad-hoc basis where we believe they can add value in developing our responsible investment approach.

03 Our strategy

We believe ESG integration and stewardship can enhance investment performance. As such, we prioritise the ESG-related risks and opportunities we believe are the most material to deliver good outcomes for our clients. These drive the development of our responsible investment approach.

Key ESG-related risks and opportunities we've identified:

Risks

Climate change

Climate change is an environmental concern globally. Our investment proposition is by far the largest contributor to our carbon emissions. We are committed to our investments becoming net zero by 2050.

In 2025, we set our second carbon emissions reduction interim target. By 2030, we aim to have reduced the weighted average carbon intensity of our investments by 50% relative to 2019. This follows successfully achieving our first interim target of a 25% reduction by 2025.

See pages 10-13 for more details on our climate strategy.

Human and labour rights

We understand that through investment decisions, financial institutions can have a significant impact on preventing human rights abuses. Through our exclusions policy and engagement themes, we integrate controversial behaviour considerations, including human rights breaches, into our responsible investing approach.

Given our exposure to a high number of companies in our funds, investments have been identified as a potential high risk for modern slavery by the Group. To gain a deeper understanding of how our investment managers approach modern slavery and human trafficking risks, we included an additional question in our investment manager assessment. We asked managers whether they have a policy or statement in place that sets out their approach to these considerations.

Responses were returned for the first time in 2024 and were assessed considering the extent to which their approach or policies consider related risks, colleague education, wider business risks and impact investment decisions. In 2025, plans are in place to directly engage with investment managers on their responses.

Opportunity

Stewardship

We believe stewardship can enhance financial returns by encouraging companies to address key ESG risks and capitalise on opportunities. When we meet with managers, we discuss their priorities. We have identified our 'top 20 emitters' i.e. the 20 companies that emit the highest carbon emissions across our fund range. These companies are a key focus of our stewardship activity given we have identified climate change as priority ESG risk.

See page 15 for more information on how we approach stewardship

Over the year, we:

- continued to develop our annual responsible investment manager assessment process. We created new assessments tailored to passive equities, money markets and tax advantaged mandates. New questions on natural capital and macro stewardship were also added to gather new insights into these areas.
- deepened our oversight of our investment managers' stewardship activities.
- created new consumer-facing disclosures for some of our funds to help clients understand our ESG integration approach.
- implemented material changes to the objective and strategy of our Sustainable & Responsible Equity fund such that it meets the criteria to use a UK 'Sustainability Focus' label. These changes were implemented in February 2025.
- developed a coal policy statement setting out our stance on this key area of the energy transition.

Our climate strategy

The following are key climate-related risks and opportunities related to the investement decisions we make on behalf of our clients.

Timeframes

When we believe the risk/opportunity is most likely to materialise. S **Short Term** - 0-5 years M **Medium Term** - 6-9 years L **Long Term** - 10+ years

Transition risks

Principal risk amplified	Underlying climate-related risk	Timeframes	Definition	SJPUTG contribution
Strategy and change	Reputation risk – greenwashing	S M	Financial risk from loss of prospective or existing clients due to negative publicity caused by greenwashing or accusations of greenwashing.	SJPUTG can contribute by ensuring that references to sustainability credentials of funds are clearly explained and evidenced through transparent fund factsheets. In addition, as SJPUTG is subject to Sustainability Disclosure Requirements, we have produced consumer-facing disclosure documents in line with this.
	Reputation risk – action failure	M	Financial risk from loss of prospective or existing clients due to negative publicity caused by failure to positively contribute to tackling the challenges of climate change.	SJPUTG contributes by ensuring that our investment product offering evolves to meet client expectations, including in relation to responsible investing. Failure to do so may threaten the ability to attract and retain climate-conscious clients. SJPUTG's portfolio-based emissions are tracked and have already achieved reported reductions in intensity-based emissions. New net zero interim emissions targets have been developed in 2025.
Client proposition	Market risk – client offering	M	Financial risk from failure to adapt product and service offering resulting in fewer sales to a sustainability conscious client base.	Decreasing client retention directly impacts the business of SJPUTG, as it does the wider Group. SJPUTG helps mitigate this risk through the development of products and strategies to meet our clients' climate-related requirements and expectations, should they continue to grow. To help identify these expectations, we collect customers' responsible investment preferences through customer/adviser surveys.
Regulatory and legislative	Policy & legal – regulatory compliance	M	Financial risk of increased costs for continued compliance given enhanced climate-related disclosure, governance, and risk management obligations. Risk of regulatory fines if we fail to comply with these requirements.	As the Group's unit trust manager, SJPUTG and the responsible investment team are responsible for ensuring SJP's funds comply with regulations. This includes requirements related to fund management from a climate perspective. SJPUTG is subject to additional environmental and sustainability-related disclosure requirements introduced by the FCA in 2024. A significant piece of work has been undertaken by the Responsible Investment and Compliance teams to ensure the Group does not breach regulatory requirements. Failure to do so may result in both entity-specific or Group-level fines or regulatory action.

Our climate strategy continued...

Transition risks

Principal risk amplified	Underlying climate-related risk	Timeframes	Definition	SJPUTG contribution
Financial	Market risk – investments value	M	Financial risk of losses on investments caused by climate-driven physical and transition-related risks adversely affecting investment values.	SJPUTG is exposed to market risk as its income, though also a large proportion of the expense base, will also separately rise and fall in line with fund performance. This is because the majority of income is derived from ongoing product charges, which are levied as a percentage of funds under management. Our investment approach draws upon a diversified, global pool of investment opportunities. This aims to reduce concentration risk, meaning our clients are less likely to suffer a significant financial loss via sudden market changes. Furthermore, our investment managers consider climate transition risk as part of their investment decision-making. This involves greater use of climate transition risk (and physical risk) modelling. Through our investment manager governance and oversight processes we also monitor investment manager performance and take appropriate action in an aim to ensure good outcomes for clients.

Opportunities

Principal risk amplified	Timeframes	Definition	SJPUTG contribution
Market – client proposition	S M L	The client attraction and retention opportunity for SJP arising from developing new sustainable investment solutions, demonstrating our commitment to managing climate impact throughout our clients' financial journeys.	SJPUTG helps with maximising this opportunity via the investment solutions offered to current and potential clients through its product offerings. The impact of realising this opportunity could include greater client satisfaction, retention, and increased market share.
Reputational benefits	M	The potential benefits of building a strong reputation of transparency, including around ESG activities.	We'll be more likely to be able to protect and grow our market share by being recognised as an authentic responsible business, which helps clients to achieve their goals, including to protect and grow their wealth in a responsible way.

Our climate strategy continued...

Below we have highlighted broader risks we believe may impact our investment decision making and/or investment returns.

Climate-related risks

Our fund range is diverse to cater to the different needs and preferences of our clients. As such, clients' exposures to climate-related risks will be influenced by the investment products they invest in.

Exposure to climate-related risks will also differ based on asset class. For example, as equities are longer-term investments, they tend to have slightly higher exposures to long-term climate impacts compared to funds that mainly invest in bonds.

To help clients understand how these risks impact their investments, our TCFD Product report includes carbon data and analysis on a fund by fund basis.

Data availability and quality

We use data provided by MSCI to analyse and report on carbon emissions and other climate-related metrics. MSCI collate data from individual companies and use proxies where data is not available.

As the landscape evolves, data quality and coverage is improving, as are estimation models. It is important that our data sources remain robust for our investment analysis, and to ensure the data in our client reporting remains credible. Our responsible investment specialists review our data providers periodically to ensure they remain fit for purpose and in line with peers and the wider industry in their approach and offering.

Conflicts of interest

We identify actual or potential conflicts of interest that may impact the investment decisions we make on behalf of our clients. For example, a fund's objective may be influenced by corporate strategy or targets such as achieving net zero. These are recorded, monitored and risk controls are put in place to prevent or manage the conflict. In this case, our Group Investment Director sits on our Group Executive Committee and represents the investment implications of any targets set at Group level.

Looking ahead – scenario analysis

We use scenario analysis to analyse the exposure of our investment holdings to physical and transition climate-related risks. Our analysis is based on the following three climate scenarios constructed by the Network for Greening the Financial System (NGFS):

+1.5°C

Orderly – Net Zero 2050

Approximate global warming by 2100: +1.5°C

A scenario that limits global warming to 1.5°C, reaching net zero CO_2 emissions around 2050. The scenario assumes climate policies are introduced immediately with a 'smooth' implementation globally. There are also significant advancements in climate technological innovation.

+1.5°C to +2°C

Disorderly – Delayed Transition

Approximate global warming by 2100: +1.5°C to 2°C

The delayed transition scenario assumes global emissions do not decrease until 2030 and an ambitious policy response is subsequently needed to limit global warming to below 2°C. This scenario assumes disorderly policy action across regions, with a rapid rate of change driving more specific sector risks.

+3°C

Hot House World

Approximate global warming by 2100: +3°C

A Hot House World scenario assumes only current policies are preserved, resulting in continued emissions increases and a 3°C warming.

Our most recent scenario analysis can be found on pages 24 – 29 of our Group Climate report.

For more information on our climate strategy, see pages 12-30 of our Group Climate report.

Our strategic resilience

Our strategic resilience to ESG-related risks is bolstered by the ongoing implementation of our responsible investment approach. Key areas that help strengthen our strategic approach include, but are not limited to:

Minimum standards

Our minimum standards ensure investment managers are integrating financially material ESG risks and opportunities into their investment decision making.

- Our managers must be signed up to the Principles for Responsible Investment (PRI). Signatories are required to commit to six principles of responsible investing. To become, and remain a signatory, investment managers need to develop their own responsible investing policy and have at least one person whose role includes implementing responsible investment.

  Signatories submit a regular assessment which is scored by the PRI. The assessment is a detailed questionnaire covering a range of indicators and modules. It delves deeply into how signatories implement their responsible investment policy in practice. Areas such as: governance, strategy, stewardship, capital allocation, and climate change are covered as well as separate asset class specific modules.

- We also require our investment managers to follow our exclusions policy, where possible. For example, the policy doesn't apply where our investment managers hold third-party strategies and/or index replication strategies.

Our exclusions policy

The policy covers producers of controversial weapons and companies with unaddressed breaches of the United Nations Global Compact Principles.
Read the full policy here.

Controversial weapons

The production and use of certain weapons have been deemed unacceptable under international conventions and illegal within certain jurisdictions. This is because they may cause severe harm to civilians during and after conflicts.

We deem the following to be controversial weapons:

- anti-personnel mines
- cluster munitions
- chemical and biological weapons
- depleted uranium weapons
- nuclear weapons

We avoid investing in companies that produce, or produce essential components of, these weapons.

Unaddressed United Nations Global Compact Principles (UNGCP) breaches

The UNGCP are a set of minimum standards for companies in four areas: human rights, labour, the environment, and corruption.

If a company breaches a principle, our engagement partner, Robeco, will begin an engagement process. This may last several years and is aimed at addressing the company's breach.

If this engagement process does not lead to the desired change, we can exclude the company from our investments.

Our strategic resilience continued...

Annual responsible investment assessment

We conduct an assessment of our investment managers annually to monitor their approach to responsible investing. It includes in-depth questions on areas such as investment philosophy, ESG integration, and stewardship. We tailor the assessment to the types of assets invested in by the investment manager.

We expect investment managers to support their responses with descriptions of their processes and evidence. We assess and score their responses to each question which then feeds into an overall result. This process identifies investment managers who have room for improvement and forms the basis for our follow up discussions during the year.

Stewardship oversight

We believe engagement can be a means of enhancing investment returns. We approach it in the following ways:

We engage with our investment managers

Our responsible investment specialists meet with our investment managers following the annual assessment. These meetings provide the opportunity to delve deeper on areas of interest or concern highlighted in the review.

In 2025, we have deepened our oversight of our investment managers' stewardship activities through:

- meeting with stewardship experts and other investment staff responsible for conducting engagement activity on our behalf.
- exploring the feasibility and value in engaging directly with investee companies ourselves. We have identified climate transition planning as a priority topic for this work.

Voting

We believe our investment managers are best placed to make voting decisions, as they are closest to the companies they invest in. Our priority is to ensure they are voting in the best interests of our clients. As part of our stewardship oversight, we review their quarterly voting data.

Our engagement partner, Robeco, engages with companies on our behalf.

Robeco engages directly with investee companies on a range of ~20 ESG themes, such as climate change, biodiversity, labour rights and corporate governance. Its work strengthens the engagement undertaken by our investment managers.

Collaborative engagement

We collaborate with industry initiatives to encourage better practices and disclosure.

We are members of the PRI, the Net Zero Asset Owners' Alliance, Climate Action 100+, Financial Advisers Sustainability Group and are a signatory to the UK Stewardship Code. We also engage with other industry initiatives including the Investment Association and the UK Wealth Managers on Climate group.

Read the UTG Stewardship, Engagement and Voting policy for more information about our approach

Our investment proposition and product range

ESG integration is applied across all funds. However, some clients have stronger sustainability preferences and wish to go further. We are committed to developing products that meet our clients' requirements and expectations.

We engage with our clients to understand their preferences through customer/adviser surveys and use consumer testing to gather their views on potential changes to a fund. As part of our relaunch of the Sustainable & Responsible Equity fund, we significantly increased our supporting material for financial advisers via our distributor SJP Wealth Management (SJPWM). This included key client communication material, training and an increase in our advice controls & guidance around sustainability.

Our Sustainable & Responsible Equity fund invests in companies which address environmental and societal issues for clients that wish to invest sustainably.

See pages 21 - 23 for more information.

The value of an investment with St. James's Place will be directly linked to the performance of the funds selected and may fall as well as rise. You may get back less than the amount invested.

04

Our risk management

The actions and decisions of our investment managers could restrict our ability to meet client expectations and manage material risks to their portfolios, including ESG-related risks.

We adopt a 'three lines of defence' risk management model to divide risk management across business areas.

First line
Business areas own risks and implement controls to mitigate them.

Second line
Our risk and compliance function provide oversight and assistance to ensure risk management is effective.

Third line
Assurance is provided by the 'third line' Group internal audit function on the effectiveness of governance, risk management and internal controls.

This model applies to the implementation of our responsible investment policy and approach in the following way:

First line

Our investment team is our first line of defence with responsibilities assigned to stakeholders across different levels of the division:

Group Investment Director	Chief Investment Officer	Director of Investment Research	Head of Responsible Investment
Sets the overall strategic direction of our investment offering, including responsible investment. Our Group Investment Director is also the CEO of SJPUTG.	Oversees the integration of responsible investment across our investment process, ensuring activities align with our policy and investment principles.	Oversees the effectiveness of our responsible investment function and provides constructive challenge to decisions and actions.	Responsible for the implementation of our responsible investment approach and works closely with asset class specialists to ensure new fund managers meet our minimum standards.

Second line

Our Group risk and compliance function is an independent division that provides oversight to first line activities. It reports to relevant individuals and committees as to the effectiveness of risk management activities. There is representation from risk and compliance on both our Investment Committee and Product Governance Committee.

Risks are monitored to ensure the group risk appetite isn't being compromised. This is done in many ways, such as through key risk indicators, risk assessments and control self-assessments. These methods provide oversight through the risk management framework. The framework includes our approach to responsible investment.

Our compliance team conducts regular monitoring to ensure that key controls and activities are being undertaken.

Third line

Our internal audit division provides independent and objective assurance on our internal control model. It undertakes a programme of audit reviews and reports its findings to the Group Executive Committee and the Audit Committee.

In 2024, the audit function reviewed our approach to implementing the FCA's Sustainability Disclosure Requirements and provided recommendations to help us strengthen our approach.

Climate-related risks

Our risk management process outlines how we identify, assess, monitor, and manage our material climate-related risks.

Identifying & assessing

In 2024, the Group conducted a double materiality assessment. This included hotspot analysis to identify key ESG-related risks.

Climate change was identified as an area of potential high impact within our investments. Therefore, it's a priority focus for our responsible investment specialists.

In November, we held a workshop with key subject matter experts, including representatives from the investment team, to assess and score our most material climate-related risks and opportunities. These are outlined in the table on pages 10-11.

Our annual assessment of investment managers helps to identify any areas for further engagement or escalation where we believe an investment manager's approach does not align with our expectations.

Managing

We expect our investment managers to integrate climate-related risks and opportunities in their investment decision making and engagement activities.

Our responsible investment approach outlines the controls we have in place, such as our minimum standards, to ensure our expectations are being met. See pages 14 - 15 for more detail.

Monitoring

We monitor our investment managers through our responsible investment annual assessment and engage with each of them every year.

Our responsible investment policy is reviewed and approved periodically by the Investment Committee and the SJPUTG Board. These reviews ensure our policy remains fit for purpose and aligned with our investment principles and overall strategic direction.

Our second and third line functions are a mechanism for ad-hoc internal monitoring of our activities. They provide internal assurance of our approach and recommend areas for improvement.

For more information how we manage climate-related risks, see pages 34-35 of our Group Climate report.

05 Our metrics and targets

We measure and monitor ESG-related metrics to assess and benchmark our responsible investment approach, and that of our investment managers. Metrics keep us accountable, inform areas for engagement and escalation, and help us track our progress.

Principles of Responsible Investment

Signatory of:

PRI Principles for Responsible Investment

Investment managers' PRI signatory status

Our minimum standards ensure all of our appointed investment managers are members of the PRI. We check their signatory status at least annually. As of the 30th June 2025, all bar one of our investment managers was a signatory. This manager has completed its PRI submission and is awaiting confirmation of its signatory status.

Our own PRI assessment

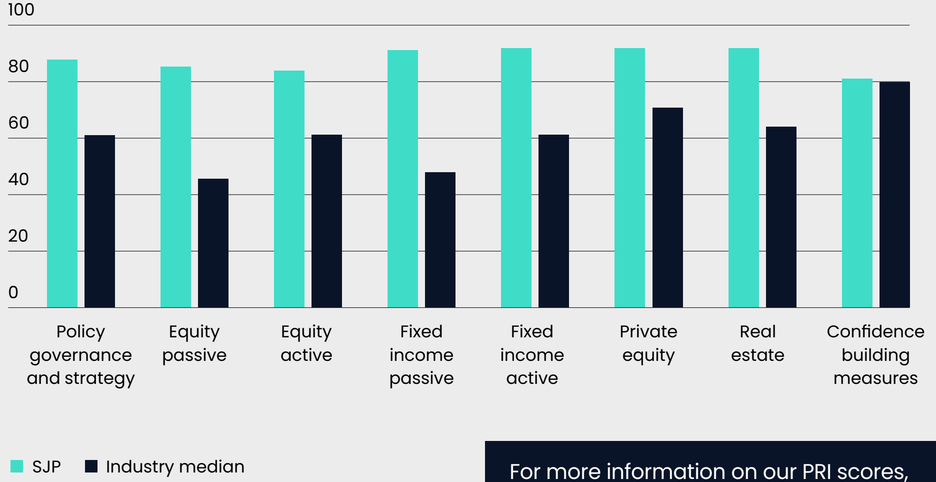
We have been a PRI signatory since 2018 and are assessed annually. The assessment includes a number of sections which cover:

- our responsible investment policy, governance, and strategy
- how we select and monitor our investment managers
- our responsible investment reporting

We also complete asset class specific modules to demonstrate how we tailor our ESG integration based on investment style. Our responses are independently assessed which provides external assurance of our approach.

In our latest review, we outperformed the industry median score across all modules.

2024 PRI assessment scores



For more information on our PRI scores, read our public transparency report and our full assessment report.

Progress against our climate targets

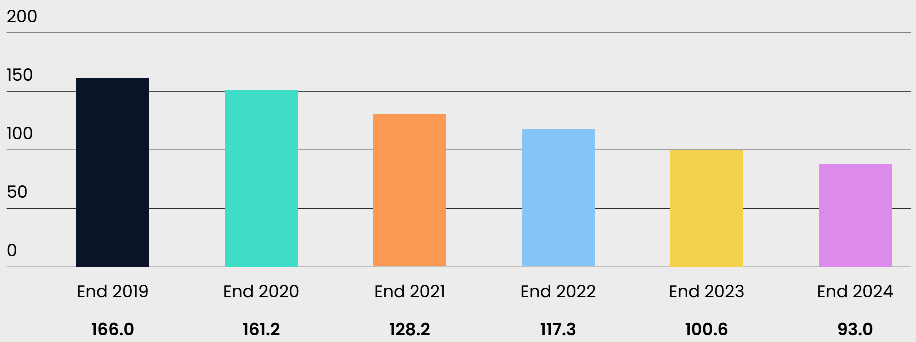
Climate change is an environmental concern globally. At SJP, our investment proposition is by far our largest contributor to carbon emissions. We are committed to our investments becoming net zero of carbon emissions by 2050* and set interim targets to keep us accountable. In 2020, we set a target to reduce carbon emissions of our investments by 25% by 2025 (versus 2019 baseline). By the end of 2024, we had exceeded this target.

In June 2025, we set an extension to this target. By 2030, we are aiming to have reduced the emissions of our investments by 50% (versus 2019 baseline). We will continue to transparently report our progress against our interim targets in our reporting and disclosures.

St. James's Place weighted average carbon intensity

(overall WACI)

Measured in tonnes of CO^2e/$million of revenue



The scope of the data represented in this graph is limited to our equity and debt for listed companies. It does not include real estate.

Climate-related metrics for our funds

We also monitor the following metrics for each of our funds:

- Scope 1 and Scope 2 Greenhouse Gas Emissions
- Scope 3 Greenhouse Gas Emissions
- Total Carbon Emissions
- Total Carbon Footprint
- Weighted Average Carbon Intensity
- Climate Value at Risk
- Implied Temperature Rise

Our TCFD Product report includes these metrics for our funds as well as information around how climate-related risks may impact each fund. It also includes a glossary with definitions of each metric and explanations of how they are calculated.

Read more on our progress against our climate targets on pages 41 -42 of our Group Climate report

Commitment is inclusive of listed equity, publicly available corporate debt, and real estate. This is approximately 85% of our unit trust funds under management (FuM) as at 30 June 2025. Carbon reduction targets are based on weighted average carbon intensity and are measured against a 31 December 2019 baseline year.

06

Sustainable and Responsible Equity fund

In February 2025, we made material changes to our Sustainable & Responsible Equity unit trust. The fund has adopted a UK 'Sustainability Focus' label. It is subject to the policy and approaches set out in this report with some additional controls and oversight. This section outlines the fund's governance, strategy, and metrics, which materially deviate from that of the rest of our funds.

Governance of the fund

The governance and oversight of the fund is covered by the approach set out for all our funds in section 1 of this report. However, there are additional controls and oversight measures applied to ensure the fund meets the criteria for its 'Sustainability Focus' label and its sustainability objective.

Stakeholder	Responsibility
SJPUTG Board	◆ Annually assessing the value of the fund which includes consideration of how the fund has progressed against its sustainability objective.
Product Governance Committee	◆ Responsible for the annual product review including: fund structure, name, sustainability label and target market. ◆ Facilitating any changes to the fund's core sustainability characteristics that impact the product's design.
Investment Committee	◆ Initial manager selection of Schroders. ◆ Oversight of the investment strategy, risk, and performance, ensuring the fund aligns with SJP's investment view.
Responsible investment specialists	◆ Monitoring Schroders through an annual sustainable investment manager assessment, regular meetings and ensuring their approach meets our standards. ◆ Reviewing the fund's performance against its KPIs on a monthly basis. ◆ Escalating any concerns via the following process: - Should the requirement that 70% of fund is held in sustainable investments level be breached, our responsible investment specialists will immediately escalate this to the Director of Research and Chief Investment Officer. - Schroders will be asked for comment and proposed remedial action. - The breach will then be discussed at the closest Investment Management weekly meeting.
Schroders	◆ The selection and day-to-day management of the fund's assets according to its objective.

The value of an investment with St. James's Place will be directly linked to the performance of the funds selected and may fall as well as rise. You may get back less than the amount invested.

Strategy

The fund aims to achieve capital growth over five years by investing in companies that provide a positive contribution to the environment and society through what they sell and/or how they are managed.

Sustainability Focus

The fund has a 'Sustainability Focus' label. This means it mainly invests in assets that are environmentally and/or socially sustainable.

The environmental and social characteristics promoted by the fund include:

- reducing greenhouse gas emissions which helps to slow down climate change
- employee wellbeing such as paying more than living wage or providing training to employees which supports their professional development and prosperity
- customer wellbeing, such as developing new products and services that improve customers' quality of life
- healthy, inclusive, and connected communities, such as providing access to clean water and sanitation which promotes good health
- effective and accountable institutions such as promoting financial stability, which supports people's prosperity and financial security

What the fund will not invest in

The fund has a robust exclusions list. It will not invest in companies that are directly and materially exposed to activities that are significantly damaging to the environment. There are also restrictions on investing in companies that make money from specific harmful activities or products.

A company will be excluded if its revenue from one of the excluded industries meets a certain level. For example, if a company makes 5% or more of its revenue from gambling, the fund will not invest in it.

Excluded industry	Revenue level
Alcohol producers	≥5%
Alcohol (other revenue)	≥10%
Tobacco	≥5%
Gambling	≥5%
Adult entertainment	≥5%
Conventional weapons	≥10%
Civilian firearms	≥10%
Controversial weapons (biological weapons, chemical weapons, cluster munitions, depleted uranium and landmines)	No revenue allowed >0%
Nuclear weapons	No revenue allowed >0%
Fossil fuels extraction and production	≥5%
Utilities (thermal coal and oil power generation)	≥10%

The fund also excludes companies that have demonstrated material ESG misconduct. This is measured by breaches of relevant principles such as:

- UN Global Compact Principles
- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights

UN: United Nations
OECD: Organisation for Economic Co-operation and Development

Metrics and targets

The fund has a set of KPIs which help us assess whether it is meeting its sustainability objective. Our responsible investment specialists review them on a monthly basis.

Key performance indicator (KPI)	as at 30 June 2025
Overall sustainability score	3.9
Environment/planet score	0.5
Social/people score	4.4
Investments classified as sustainable	81%
Investments classified as sustainable by Investment Panel	5.1%

✓ The fund's sustainability scores are above zero. Positive scores reflect the positive contribution companies in the fund make to the environment and/or society.

✓ 81% of the fund was invested in companies classified as sustainable, which is above the 70% minimum requirement.

Therefore, the fund is meeting its sustainability objective.

How scores are calculated

Schroders uses a model to calculate a sustainability score based on a company's environmental and societal benefits and costs. Companies need a positive score to be considered sustainable which demonstrates that the company operates sustainably, making a positive contribution in at least one of the following areas:

- the environment (environment/planet score)
- employee wellbeing, customer wellbeing, healthy, inclusive and connected communities, and/or effective and accountable institutions (social/people score)

A positive score indicates a good or excellent contribution in at least one of these areas while also not producing significant costs to the environment or society (based on the model's metrics).

If Schroders has reason to believe the model does not provide a fair reflection of a company, it can refer to its Sustainable Investment Panel. The Panel will review additional evidence and assess whether the company would achieve a positive score, if the evidence were available in the model.

The individual company scores are then aggregated to calculate the KPIs which are monitored by our responsible investment specialists to determine whether the fund is meeting its sustainability objective.

More information about these metrics can be found in the fund's prospectus.

07 Our conclusion

We believe the consideration of ESG risks and opportunities can help deliver good outcomes for our clients and are proud of the work we have done to develop a robust responsible investment approach.

Looking forward, we have identified priority areas which will be the focus of our attention. These include:

Committing to our second interim carbon reduction target. Stewardship will be a key lever to achieve our net zero goal. Over 2025, we will continue to build out our stewardship oversight programme through:

1. Working more closely with our investment managers to understand the engagement activity they undertake on our behalf and exploring the possibility of engaging with investee companies ourselves.
2. Continuing to raise awareness of the importance of macro stewardship. We will be looking at how our investment managers are engaging with governments and policymakers to drive climate policy forward.

Engaging with our investment managers on their human rights policies to explicitly manage material societal risks within our investments.

Additionally, we will continue to meet the FCA's Sustainability Disclosure Requirements and will publish sustainability product reports for some select funds in 2026.

Compliance statement

At SJP we are committed to promoting transparency and accountability in our approach to sustainability. This report includes information on the ESG performance of the SJPUTG which is the authorised fund manager for all SJP unit trusts (also referred to as funds). It is compliant with the Sustainable Disclosure Requirements as outlined by the FCA in the ESG sourcebook.

It covers the period 1 July 2024 to 30 June 2025 and will be updated at least annually.

Tom Beal, Group Investment Director and Chief Executive Officer of SJPUTG
2nd September 2025

www.sjp.co.uk

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