

M&G Investments Shareholder Rights Directive II



Disclosures for Pooled Pension Funds

June 2022

The revised Shareholder Rights Directive is intended to promote better shareholder engagement and improve transparency in the ownership of companies by requiring asset managers, like M&G, to make certain disclosures to institutional investors like life assurance companies and occupational pension schemes as defined in the Directive.

Below, we have signposted where you can find details on how M&G meets its Shareholder Rights Directive transparency requirements and implements its [Engagement Policy](#).

Requirement	M&G Pooled Pension Funds
How does the fund's investment strategy, and implementation thereof, comply with the fund's objective and contribute to medium- to long-term performance of the assets of the fund	The relevant information is detailed in the Fund Description, Performance Objective, Investment Approach and Investment Review sections of the relevant fund's Fund Profile and Fund Factsheet
Report on the key material medium- to long-term risks associated with the fund's investments	The relevant information is detailed in the Risk Rating section of the relevant fund's Fund Profile
Report on the portfolio composition of the fund	The relevant information is detailed in the relevant Fund's Factsheet
Report on the turnover and turnover costs of the fund	M&G publish DCPT figures on our website
Report on the use of proxy advisors for the purpose of engagement activities	Active voting is an integral part of our investment approach. M&G's Voting Policy is regularly reviewed. Our voting instructions are processed through the ISS voting platform and we have access to ISS benchmark and custom research. We disclose our full voting history quarterly on our website . M&G provides a narrative of our engagement and voting activities in the ESG Engagement and Voting section of our Annual Corporate Finance and Stewardship Report
Report on the firm's policy on securities lending and how it is applied to support the firm's engagement activities	M&G does not carry out securities lending for M&G Pooled Pension funds
Report on how the fund makes investment decisions based on evaluation of the expected medium- to long-term performance of investee companies, including non-financial performance	The relevant information is detailed in M&G Investments ESG Investment Policy . M&G provides a narrative of our engagement and voting activities in the ESG Engagement and Voting sections of our Annual Corporate Finance and Stewardship Report Additionally, relevant information is detailed in the Fund Description, Performance Objective, Investment Approach and Investment Review sections of the relevant fund's Fund Profile and Factsheet
Report on whether conflicts of interests have arisen in connection with engagement activities and how the firm has dealt with such conflicts	Conflicts do not regularly arise in the context of engagement activities, but where they do, we will disclose how they were dealt within our Annual Corporate Finance and Stewardship Report Additionally, conflicts are reported in line with the wider M&G Conflict of Interest Disclosure Statement and, where appropriate, a plan for mitigating the conflict will be agreed

Requirement	M&G Pooled Pension Funds
Report on the firm's remuneration policy for fund managers	<p>Remuneration is made up of fixed pay (salary and benefits) and performance-related pay. Performance-related pay aligns the interests of fund managers with the investment objectives of clients. Short-term incentives for fund managers are determined on a discretionary basis taking into consideration a range of factors including but not limited to adherence to risk management and compliance policies, adherence to company culture, values and behaviours, fund/financial performance (including investment performance measured over three years). Moreover, a portion of the short term incentive is deferred for three years (cliff vesting) into a combination of notional fund units and M&G plc shares</p> <p>M&G's full Remuneration Policy</p>

Additional Links

Engagement Policy	Voting Policy	ESG Investment Policy
Annual Corporate Finance and Stewardship Report	Voting History	Remuneration Policy