



# **Legal & General Investment Management Limited Legal Entity TCFD Aligned Report**

# Purpose

This is L&G Asset Management's third annual TCFD-aligned entity-level report setting out how Legal & General Investment Management Limited (LGIM Limited) takes climate-related risks and opportunities into account when administering investments on behalf of clients and consumers.

Legal & General Group Plc's TCFD aligned report, referenced as the [L&G – Climate and Nature Report 2024](#) throughout this document, sets out our group-wide strategy and approach regarding climate-related risks and opportunities. This LGIM(L) TCFD aligned entity report should be read in conjunction with the L&G – Climate and Nature Report 2024, which also includes aggregated group metrics that are relevant to LGIM Limited and the assets it administers.

This report is designed to describe how TCFD in-scope assets are governed, how strategy is set, how climate risks are managed and where there are differences in approach as outlined in the L&G – Climate and Nature Report 2024.

LGIM Limited is one of L&G Asset Management's Investment Managers. It is a Markets in Financial Instruments Directive ("MiFID") firm and responsible for investment management of internal and external clients' funds.

## Compliance statement

The disclosures in this report, including the product reports cross-referenced, comply with the TCFD recommendations, entity reporting requirements and product-level reporting requirements set out in Chapter 2 of the FCA's Environmental, Social and Governance sourcebook.

Signed: 

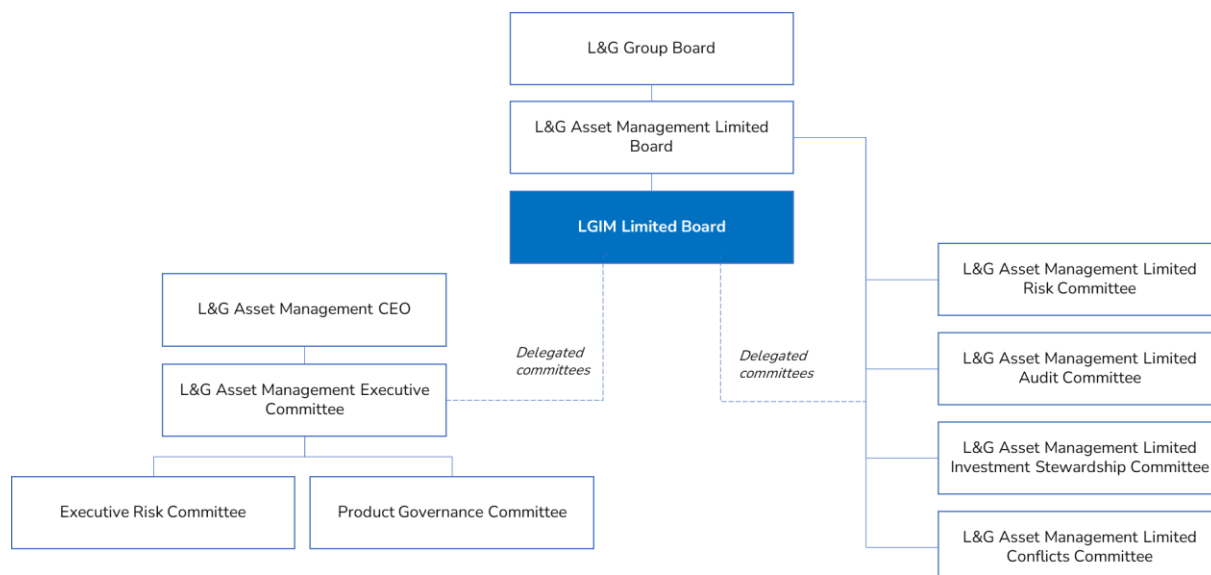
## Reporting period

This report is prepared as of 31 December 2024 and covers the period from 1 January 2024 to the reporting date.

## Delegations

L&G Asset Management Limited is the holding company for L&G Asset Management and is a wholly owned subsidiary of Legal & General Group Plc (L&G). It acts as the controller of the L&G Asset Management Limited group of companies, monitoring and overseeing the performance of L&G Asset Management. The L&G Asset Management Limited Board is responsible to its shareholder, L&G, for promoting the long-term success of L&G Asset Management Limited and in particular, for outlining L&G Asset Management's strategic priorities, monitoring management's performance against those strategic aims, setting risk appetite, and ensuring that effective controls are in place and the division is adequately resourced.

As a direct subsidiary of L&G Asset Management Limited, LGIM(L) leverages and benefits from the wider governance structure of L&G Asset Management. Formal delegations are in place to support the framework and enable committees of L&G Asset Management to focus on matters on behalf of LGIM(L). This includes matters relating to climate-related risks and opportunities and forums such as the L&G Asset Management Limited Risk Committee, the L&G Asset Management Limited Investment Stewardship Committee, the L&G Asset Management Limited Executive Committee, the Executive Risk Committee and the Product Governance Committee, all of which undertake duties on behalf of LGIM Limited as illustrated in the abbreviated chart below.



All committees oversee climate-related risks and opportunities

## Governance

*Disclose the organisation's governance around climate-related risks and opportunities.*

**Governance:** These recommendations are addressed in the Governance section of the L&G – Climate and Nature Report 2024. Specific references and examples are provided below with relevant sources on where additional information is published.

### Recommended Disclosure a)

Describe the Board's oversight of climate-related risks and opportunities.

Please see the 'Delegations' section above, which highlights how L&G Asset Management's Board/Committees are structured and how they oversee climate-related risks and opportunities.

LGIM Limited is a direct subsidiary of L&G Asset Management Limited, and, as such, the governance arrangements of LGIM Limited sit within the wider governance framework of the L&G Asset Management division.

L&G Asset Management has a robust corporate governance framework in place that brings authority and accountability, enables effective decision-making, and allows oversight of the implementation of L&G Asset Management's strategic objectives and climate-related risks and opportunities.

*For examples of how we manage oversight of climate-related risks and opportunities specifically, please see references below:*

[L&G – Climate and Nature Report 2024:](#)

(page 31) *Board Oversight* – This section outlines L&G's Board oversight of climate-related risks and opportunities.

[L&G Asset Management – Active Ownership Report 2024:](#)

(page 14) *Rigorous governance and resourcing* – This section details L&G Asset Management's governance structure and how responsible investment strategy is fully integrated and overseen across our formal

	<p>governance committees.</p> <p><a href="#">L&amp;G Asset Management – Real Estate Equity Climate Report 2024</a> (page 17) <i>Board oversight</i> – This section outlines the governance structure and responsibilities for overseeing and escalating climate-related risks across L&amp;G Private Markets.</p>
<p><b>Recommended Disclosure b)</b></p> <p>Describe management's role in assessing and managing climate-related risks and opportunities</p>	<p><a href="#">L&amp;G – Climate and Nature Report 2024:</a> (page 31-32) <i>Board Oversight / Group Environment Committee</i> - These sections describe the L&amp;G management team's role in assessing and managing climate-related risks and opportunities.</p> <p><a href="#">L&amp;G Asset Management – Active Ownership Report 2024:</a> (page 14) <i>Rigorous governance and resourcing</i> – This section details L&amp;G Asset Management's governance structure and how responsible investment strategy is fully integrated and overseen across our formal governance committees.</p> <p><a href="#">L&amp;G Asset Management – Real Estate Equity Climate Report 2024</a> (page 18) <i>L&amp;G Private Markets Responsible Investment and Sustainability Team</i> - This section outlines management's role in assessing, managing, and integrating climate-related risks across L&amp;G Private Markets.</p>

## Strategy

*Disclose the actual and potential impacts of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning where such information is material.*

**Strategy:** These recommendations are addressed in the Strategy section of the L&G – Climate and Nature Report 2024. Specific references and examples are provided below with relevant sources on where additional information is published. Fund-level strategies are disclosed in the product level TCFD disclosures listed further below.

<p><b>Recommended Disclosure a)</b></p> <p>Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.</p>	<p><a href="#">L&amp;G – Climate and Nature Report 2024:</a> (page 11) <i>Climate and nature-related opportunities and risks</i> – This section highlights L&amp;G's material climate and nature-related opportunities and risks that have been identified over the short, medium and long term.</p> <p><a href="#">L&amp;G Asset Management – Climate Impact Pledge 2024</a> (page 3) <i>Executive summary</i> - This section explains why and how we assess company climate risks and opportunities. Further detail on the role of our Climate Impact Pledge (CIP) processes can be found throughout the report. Sector-specific risk and opportunity considerations can be found in greater detail in our <a href="#">CIP sector guides</a>.</p> <p><a href="#">L&amp;G Asset Management – Real Estate Equity Climate Report 2024</a> (page 7) <i>Climate-related risks and opportunities: Summary</i> - Describes the climate-related risks and opportunities across L&amp;G Private Markets' real estate equity assets, and the time horizons and climate scenarios they are expected to be most material in. (page 8-10) <i>Climate-related risks and opportunities: Physical climate modelling results</i> – Provides detail on the physical climate risk exposure to L&amp;G Private Markets' real estate equity across time horizons and climate scenarios.</p>
<p><b>Recommended Disclosure b)</b></p> <p>Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning.</p>	<p><a href="#">L&amp;G Climate and Nature Report 2024</a> (pages 15 - 17) <i>Our strategy</i> - This section describes how Asset Management uses our influence as an asset manager, through the products we offer and our Investment Stewardship team, leveraging our influence to address the financially material issue of climate change.</p> <p><a href="#">L&amp;G – Climate Transition Plan 2023:</a> (page 7) This page provides detail on L&amp;G's strategy on climate-related risk including how climate-related risks and opportunities are factored into relevant products and investment strategies; see also the 'Invest' and 'Influence' sections.</p> <p><a href="#">L&amp;G Asset Management – Climate Impact Pledge 2024</a> (pages 3 – 6) <i>Executive Summary</i> - This section outlines LGIM's targeted engagement programme aimed at addressing the systemic issue of climate change.</p> <p><a href="#">L&amp;G Asset Management – Real Estate Equity Climate Report 2024</a> (page 11-13) <i>Climate Strategy</i> – This section describes L&amp;G Private Markets' net zero carbon strategy and climate resilience strategy for managing transition and physical climate-related risks.</p>

	<p>(page 14-16) <i>Integrating climate risk throughout the investment lifecycle</i> – This section details how climate risk is integrated into strategic intervention points throughout the investment life cycle.</p> <p><a href="#">2023 Update - Real estate equity: Net-zero carbon roadmap</a> Details L&amp;G Private Markets' real estate equity's strategy to transition the real estate portfolio to net-zero carbon by 2050, including progress made against the strategy.</p>
<p><b>Recommended Disclosure c)</b></p> <p>Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.</p>	<p><a href="#">L&amp;G – Climate and Nature Report 2024:</a> (pages 44 – 47) <i>Group portfolio scenario impacts</i> – This section details how the Destination@Risk toolkit allows L&amp;G to evaluate climate risk and alignment at a company, sector and portfolio level.</p> <p><a href="#">L&amp;G Asset Management – Active Ownership Report 2024:</a> (page 12) <i>Considered risk management: Climate solutions – Destination @Risk</i> – This section provides an update on the L&amp;G Asset Management Destination@Risk model, which enables the building of bespoke, bottom-up climate scenarios to explore a range of possible future climate pathways and their potential impacts.</p> <p><a href="#">L&amp;G – Climate Transition Plan 2023:</a> (page 7) – This page provides detail on L&amp;G's strategy on climate-related risk; specifically, through the decisions L&amp;G Asset Management makes on its investments and the influence it has with its stewardship activity as detailed throughout the remainder of the transition plan.</p> <p><a href="#">L&amp;G Asset Management – Real Estate Equity Climate Report 2024</a> (page 5-6) <i>Strategy</i> – These pages demonstrate L&amp;G Private Markets' commitment and approach to climate resilience across time horizons and climate scenarios.</p>

## Risk Management

*Disclose how the organisation identifies, assesses, and manages climate-related risks.*

**Risk management:** These recommendations are addressed in the Governance and Risk Management section of the L&G – Climate and Nature Report 2024. Specific references and examples are provided below with relevant sources on where additional information is published.

<p><b>Recommended Disclosure a)</b></p> <p>Describe the organisation's processes for <i>identifying</i> and assessing climate-related risks.</p>	<p><a href="#">L&amp;G – Climate and Nature Report 2024:</a> (page 34) <i>Our approach to risk identification</i> – This section provides an overview of how L&amp;G identifies and assesses climate-related risks. Through integrating climate risk management into our existing risk and governance framework, we have carried out a detailed assessment of how we could expect climate and nature risks to emerge across our business model.</p> <p><a href="#">L&amp;G Asset Management – Active Ownership Report 2024:</a> (page 12) <i>Considered risk management: Climate solutions – Destination @Risk</i> – This section provides an overview of L&amp;G Asset Management's toolkit that assesses climate-related risk for our investments. (pages 24 – 42) <i>E: Climate</i> – This section provides detail on our climate engagement activities and how we identify company and sector risks we are exposed to through our investees.</p> <p><a href="#">L&amp;G Asset Management – Real Estate Equity Climate Report 2024</a> (page 21-23) <i>Approach to identifying climate risks and opportunities</i> – This section provides an overview of L&amp;G Private Markets' approach to identifying physical and transition climate-related risks for real estate equity assets.</p>
<p><b>Recommended Disclosure b)</b></p> <p>Describe the organisation's processes for <i>managing</i> climate-related risks.</p>	<p><a href="#">L&amp;G – Climate and Nature Report 2024:</a> (page 35 – 38) <i>Risk management approach</i> – This section provides an overview of L&amp;G's process to identify and manage climate-related risks. It details the management actions we deploy to control our exposure to climate-related risks associated with our investments and operations, to meet our risk management objectives.</p> <p><a href="#">L&amp;G Asset Management – Active Ownership Report 2024</a> (pages 24 – 42) <i>E: Climate</i> – This section provides detail on our climate engagement activities that encourage better practices and disclosure, improving our ability to assess climate-related risks.</p> <p><a href="#">L&amp;G Asset Management – Climate Impact Pledge 2024</a> (pages 8 – 13) <i>How it works: our two-fold approach</i> - This section outlines LGIM's flagship engagement programme on climate change, which is structured around the TCFD framework. It details each stream (quantitative and qualitative) and the different engagement approaches, expectations and potential escalations.</p> <p><a href="#">L&amp;G – Climate Transition Plan 2023:</a> (page 26-28) – This section details L&amp;G's key climate risks and uncertainties and includes details of how they will be managed or mitigated.</p>

	<p><a href="#">L&amp;G Asset Management – Real Estate Equity Climate Report 2024</a> (page 24) <i>Risk management approach</i> – This section details L&amp;G Private Markets' process for managing and monitoring climate-related risks of real estate equity assets on an ongoing basis.</p> <p><a href="#">2023 Update – Real estate equity: Net-zero carbon roadmap</a> (page 18-23) <i>Delivering on our net-zero strategy</i> – Details L&amp;G Private Markets real estate equity's strategy to transition the real estate portfolio to net-zero carbon by 2050, as a key component for managing transition climate-related risks.</p>
<p><b>Recommended Disclosure c)</b></p> <p>Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management.</p>	<p><a href="#">L&amp;G – Climate and Nature Report 2024:</a> (page 33) <i>Risk management framework</i> – This page provides an overview of our risk management framework and risk landscape. It explains how climate risks are embedded into our risk management process, and alongside scenario analysis, it informs the assessment of how we could expect climate risks to emerge across our business model.</p> <p><a href="#">L&amp;G Asset Management – Active Ownership Report 2024:</a> (pages 7 – 16) <i>Responsible Investment</i> – This section outlines L&amp;G Asset Management's responsible investment process and the incorporation of climate-related risks and considerations into our activities.</p> <p><a href="#">L&amp;G Asset Management – Real Estate Equity Climate Report 2024</a> (page 20) <i>Risk management framework</i> – This section provides an overview of the risk management framework used for identifying, assessing, monitoring, and controlling climate-related risks and how it is integrated into overall risk management procedures.</p>



## Metrics and Targets

*Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material.*

**Metrics and targets:** Our overarching metrics and targets are provided in the Metrics and Targets section of the L&G – Climate and Nature Report 2024. Specific references and examples are provided below, with relevant sources on where additional information is published. Fund level metrics and targets are disclosed in the product level TCFD disclosure report listed further below.

### Recommended Disclosure a)

Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.

#### [L&G – Climate and Nature Report 2024:](#)

(pages 23 - 29) *Metrics and targets* – This section focuses on the key metrics L&G uses to measure progress against decarbonising our business and meeting our climate commitments. These are integral to our business strategy and risk management framework.

#### [L&G – Climate Transition Plan 2023:](#)

(page 31) *How we monitor our progress* – This section covers L&G's primary metrics for measuring progress against climate commitments.

#### [L&G Asset Management – Climate Impact Pledge 2024](#)

(pages 9-11) This section provides an overview of the quantitative metrics LGIM leverages in the Climate Impact Pledge assessment and engagement process. Further information on the climate metrics used is contained within the [CIP methodology document](#).

#### [L&G Asset Management – Real Estate Equity Climate Report 2024](#)

(page 25-28) *Metrics and targets* – This section focuses on key metrics L&G Private Markets uses to monitor and assess climate-related risks and opportunities across its operational activities and track performance against its decarbonisation targets and commitments.

#### [2023 Update – Real estate equity: Net-zero carbon roadmap](#)

(page 5) *Setting new science-based targets* - Details L&G Private Markets real estate equity's metrics for measuring progress against its 2030 SBTi pathway and its 2050 net zero carbon target.

### Recommended Disclosure b)

Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.

#### [L&G – Climate and Nature Report 2024:](#)

(pages 24 – 27) *Emissions breakdown* - These sections illustrate L&G's carbon footprint across Scope 1, 2 and 3 including, for L&G Asset Management's financed emissions.

#### [L&G – Climate Transition Plan 2023:](#)

(page 32-33) *Science-based targets* – This section details emissions disclosure aligned with L&G's SBTi disclosure.

#### [L&G Asset Management – Climate Impact Pledge Scoring Methodology](#)

This document details how, drawing on 80+ data points, leveraging L&G Asset Management's proprietary climate modelling as well as third-party data (including Scope 1, 2 and 3 emissions), our company assessments (climate ratings) are focused on five key pillars. These are in alignment with recommendations from the TCFD and we publish

	<p>company ratings, information on our ‘minimum standards’ for each sector, data providers, indicators and methodology on our dedicated <a href="#">website</a>.</p> <p><a href="#">L&amp;G Asset Management – Real Estate Equity Climate Report 2024</a> (page 25-27) <i>Metrics and targets</i> - This section details L&amp;G Private Markets' real estate equity assets' Scope 1, 2 and 3 GHG emissions and carbon footprint, and progress made against 2030 science-based targets.</p> <p><a href="#">2023 Update - Real estate equity: Net-zero carbon roadmap</a> (page 16-17) <i>Carbon emissions boundary</i> &amp; (page 18-19) <i>Delivery strategy update</i> – These sections provide more detail on L&amp;G Private Markets real estate equity's carbon footprint across Scope 1, 2 and 3 emissions, including emissions disclosure aligned with its SBTi disclosure and its performance against its 2050 NZC target.</p>
<p><b>Recommended Disclosure c)</b></p> <p>Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.</p>	<p><a href="#">L&amp;G – Climate and Nature Report 2024:</a> (page 23) <i>Key metrics and targets summary</i> – This page outlines the key metrics and targets we use to measure our progress in decarbonising our business and meeting our climate commitments. (page 29) <i>Operational targets and commitments</i> - This page outlines L&amp;G's strategic commitments and targets to support our long-term approach to managing climate and nature risks. (page 39) <i>Engagement and remuneration</i> – This page describes the remuneration incentives that are linked to climate commitments.</p> <p><a href="#">L&amp;G Asset Management – Active Ownership Report 2024:</a> (page 7) <i>Targeting long-term goals</i> – This section details L&amp;G Asset Management's climate-related targets and external commitments.</p> <p><a href="#">L&amp;G Asset Management – Real Estate Equity Climate Report 2024</a> (page 11) <i>Climate strategy: Our net zero strategy</i> - This section illustrates L&amp;G Private Markets' real estate equity assets' 2030 and 2050 decarbonisation targets for managing transition climate-related risks. (page 25) <i>Metrics and targets</i> – This section details the operational decarbonisation targets and commitments that L&amp;G Private Markets has set for its real estate equity assets. (page 28) <i>Performance-linked objectives</i> – This section details the remuneration incentives that are linked to climate-related targets.</p> <p><a href="#">2023 Update - Real estate equity: Net-zero carbon roadmap</a> (page 13-14) <i>Our Commitments</i> &amp; (page 18-19) <i>Delivery strategy update</i> – These sections provide more detail on L&amp;G Private Markets' real estate equity's climate-related targets and external commitments, including its 2030 SBTi target and 2050 NZC target.</p> <p><a href="#">2024 PRI Disclosure Report:</a> L&amp;G Asset Management reported progress against Net Zero Asset Manager initiative (NZAM) commitments through our PRI submission. PRI questions are mapped to the NZAM commitments as follows:</p>

NZAM Commitment	Reference in L&G Asset Management's 2024 PRI disclosure report
<b>Commitment 1</b>	Pages 113 – 119: Indicator SO 2
<b>Commitment 2</b>	Pages 113 – 124: Indicators SO 2, 3, 3.1, 3.2 and 4 Pages 64 – 65: Indicator PGS 46
<b>Commitment 3</b>	Pages 56 - 57: Indicator PGS 41 & 41.1
<b>Commitment 4</b>	Pages 56 – 57: Indicator PGS 41 & 41.1
<b>Commitment 5</b>	Pages 56 – 57: Indicator PGS 41 & 41.1
<b>Commitment 6</b>	Pages 56 – 57: Indicator PGS 41 & 41.1 Pages 61 – 63: Indicator PGS 44
<b>Commitment 7</b>	Page 132 – 133: Indicator SO 5 Pages 136 – 148: Indicator SO 8, 9 and 10 Pages 158 – 160: Indicator SO 13
<b>Commitment 8</b>	Pages 154 – 158: Indicator SO 12
<b>Commitment 9</b>	Pages 149 – 153: Indicator SO 11

**In scope business/products/funds:**

Relevant product and portfolio level data will be provided at client request.

**Key Risks**

The value of an investment and any income taken from it is not guaranteed and can go down as well as up, and the investor may get back less than the original amount invested.

**Important Information**

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