



Greenbank

Engagement policy 2024



Greenbank Engagement Policy

This policy document outlines our approach to engagement, including how we select priority topics, how we identify the most effective methods to employ, and the governance of our engagement strategy.



Our approach

Our vision is to empower our clients to invest their money as a force for good, together championing the transition to a healthier planet and a more equitable society.

Taking an active approach to engagement is a core part of our service and complements our investment analysis, as we aim to create and preserve long-term value for our clients. It is a vital expression of our role as stewards of our clients' assets to advocate whenever possible for positive and lasting change within the companies that we invest in on their behalf.

For over 20 years, we have engaged in open and constructive dialogue with companies to address company-specific and systemic risks, encourage best practice, and improve social and environmental wellbeing.

We engage on issues that are important financially, but we will also act where we feel an issue presents long-term systemic risks or we identify a moral imperative to address social or environmental concerns – in line with the expectations of our clients.

We engage at both a company-specific and thematic level and our activity is set in the context of long-term dialogue and ownership. We also engage with policymakers and data providers.

To create long-term value for our clients and promote sustainable development, we use our engagement activities to:

- support the aims and objectives of Greenbank's eight sustainable development themes, which map closely to the United Nations Sustainable Development Goals
- highlight and address direct concerns about a specific company issue or area of performance and improve our understanding of their sustainability performance
- signal to the market that ethical, sustainable and impact issues are important to investors
- overcome barriers to progress on sustainable development such as unreliable data, or a lack of consistent standards or frameworks
- engage with governments, regulators and supranational bodies to highlight sustainability failures in the wider market and work towards correcting them.

Our sustainable development themes

There are specific overarching environmental and social changes we are working towards through our thematic engagement activity and the investments we make. These are long-term and are linked to our eight sustainable development themes. We know that our investments or engagement cannot solve these challenges alone, but they are an important anchor in guiding our work.

These themes also map closely to the UN's Sustainable Development Goals (SDGs).

Long-term ambition	
	Habitats and ecosystems Preserve and enhance natural systems by encouraging companies to have a net positive impact on biodiversity.
	Resource efficiency Promote a circular economy that supports sustainable levels of consumption.
	Decent work Ensure proper emphasis on the quality of jobs being created and maintained alongside their quantity.
	Inclusive economies Promote an equitable economy in which there is expanded opportunity for shared prosperity.
	Energy and climate Support decarbonisation aligned to the goals of the Paris Agreement on climate change.
	Health and wellbeing Ensure companies do not undermine the health of their beneficiaries and encourage improved health outcomes.
	Innovation and infrastructure Support infrastructure that is fit to achieve broader planetary and societal goals.
	Resilient institutions Strengthen well-functioning institutions that protect the rule of law and fundamental rights.

Selecting engagement projects

Each year, we select a number of priority engagement themes where Greenbank plays a leading role in shaping the direction and strategy of the underlying project. Alongside these, we continue to play an active role in a further set of longstanding thematic initiatives, but do not lead these projects.

We also engage throughout the year on a tactical basis with the companies we invest in - for example, where we identify specific risks and work in partnership with those companies to mitigate them.

We do not believe in engagement for its own sake. The projects we choose must present a clear strategy for achieving positive outcomes and are considered against factors such as:

- alignment to our eight sustainable development themes and the long-term changes we aim for in each
- the level of exposure across Greenbank client portfolios and the extent to which individual issues are important to clients
- the prospect for deeper engagement on a more focused range of issues where positive outcomes are identifiable
- opportunities to prime the market and act as a catalyst for further investor engagement by drawing attention to overlooked issues and building consensus on how to best address them

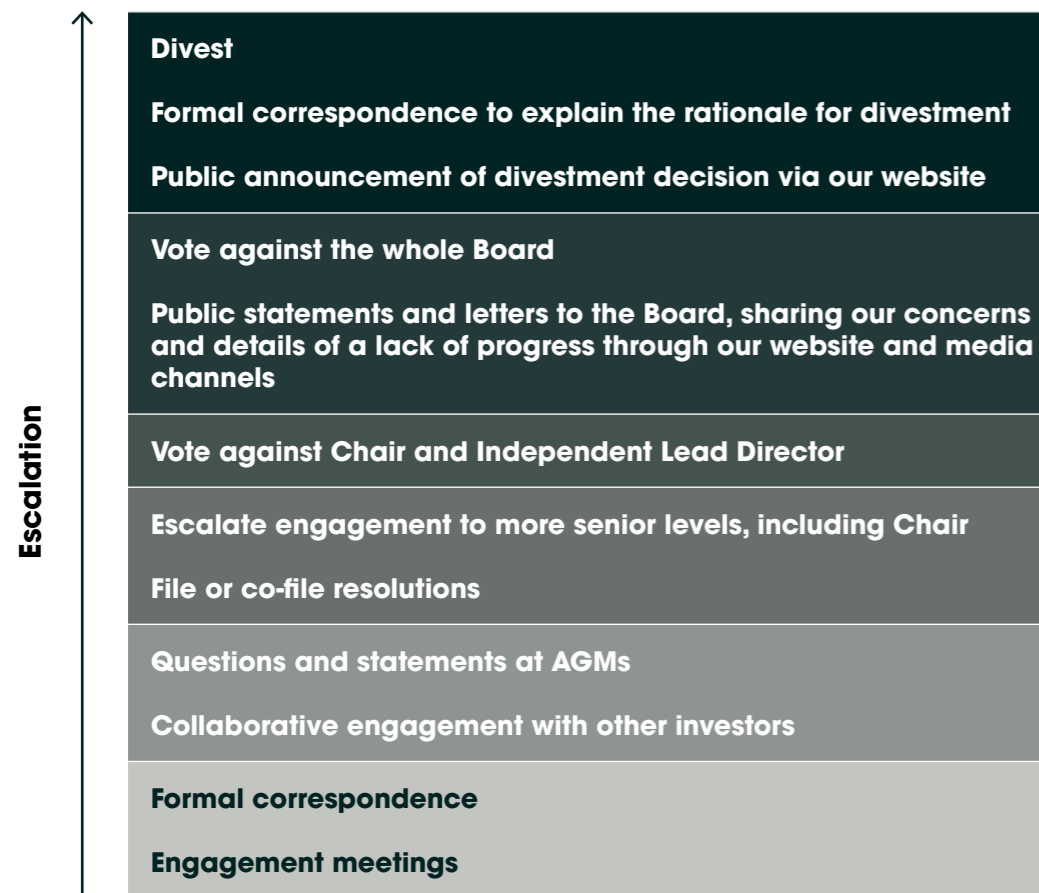
For tactical engagements, we prioritise engagement based on the magnitude of the risk to our investee companies and / or the potential social or environmental impact of the issue.

Most thematic engagements are long-term in nature given that they address long-term sustainability risks and opportunities. This means that they often require our commitment over a multi-year time frame to achieve the desired objectives.

Engagement methods

In each engagement project we aim for open and constructive dialogue, in a spirit of longer-term partnership and support — but we are never reticent in asking searching questions.

To create the conditions for lasting and meaningful change we choose the most effective engagement method from our escalation framework (see diagram below).



The most appropriate methods for each project will be decided as part of the initial project proposal. Progress is reviewed quarterly by the ethical sustainable and impact (ESI) research team, when we can opt to escalate our discussions and activities if necessary.

While we aim to stay invested and make effective use of our shareholder voice and voting rights, divestment is always an option should we feel that legitimate stakeholder concerns are not being addressed or material ESG risks are not being appropriately managed.

Collaboration

We recognise the power of collaborative engagement and partnerships and so, where appropriate, we collaborate with NGOs and other members of the responsible investment community to increase the reach and impact of our engagement activities. This enables us to create change on a deeper or more widespread scale than we may be able to achieve individually.

We work closely with Rathbones Investment Management’s stewardship team to coordinate effective interventions on issues of shared concern. All voting activities are also coordinated at the Group level by the stewardship team and Greenbank can issue tailored voting instructions on specific resolutions, as required. See Rathbones Engagement Policy [here](#).

Governance of our engagement activity

It is essential that engagements are delivered in an effective manner. A procedure has been adopted whereby our annual thematic engagement action plan is presented for review and approval at the ESI Committee which oversees and reviews Greenbank's ethical, sustainable and impact investment framework, policies and engagement activities. It receives final approval on an annual basis at the Greenbank Strategic Leadership Committee (SLC).

The strategy is also communicated to Rathbones' Engagement and Responsible Investment Committees to enable review and oversight of engagement activities that intersect with Rathbones Group's stewardship work and/or widely held investments.

Where potential engagement opportunities arise over the course of the year, the ESI research team will complete a strategy brief and seek relevant internal approvals.

The ESI research team also holds quarterly and annual engagement meetings, to review progress against engagement objectives. Quarterly and rolling 12-month engagement reviews are also shared with clients and include some examples of engagement during the previous quarter and year.

On an annual basis we also publish an Engagement Review which looks back at the milestones achieved and activity undertaken in the previous year and looks ahead to the plan for the following year.

Review

Greenbank's ESI Committee will review this policy annually.



Greenbank

For further information on the services we provide, or to arrange a meeting, please contact us.

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