

Task Force on Climate-Related Financial Disclosures (TCFD) Entity Report 2024



Contents

1. Introduction 2

2. Strategy..... 3

 MS AIML 3

 MS&AD Group 3

 Clients 3

 External Managers 3

 Investment Structure Chart 4

3. Governance..... 4

 Oversight of climate-related risks and opportunities 4

 MS AIML Climate-related Committees 5

 Relationship Structure Chart 7

 External Parties 7

4. Risk Management 9

 Risk Register 9

 Emerging Risk 9

 Investment Risk 10

5. Monitoring and Metrics 10

 Weighted Average Carbon Intensity (WACI) 10

 Network for Greening the Financial System (NGFS)..... 12

 ESG Score..... 15

 MS AIML Scope 1, 2 and 3 Emissions Data 16

6. Compliance Statement..... 16

1. Introduction

MS Amlin Investment Management Limited (MS AIML) is a wholly owned subsidiary of Mitsui Sumitomo Insurance Japan (MSIJ), which is a part of the MS&AD Group. MS AIML is regulated by the Financial Conduct Authority (FCA).

MS AIML's key to success is the delivery of competitive investment management services to MS&AD Group companies. As part of the product offering MS AIML is the headline portfolio manager for the Toro Prism Trust (TP) which was set-up by MS AIML to improve the flexibility and scalability of its investment structure. MS AIML's portfolio management responsibilities are delegated by Carne Global Fund Managers (Ireland) Limited (Carne), TP's fund manager. In carrying out its portfolio management activities, MS AIML delegates portfolio management responsibilities to carefully selected sub-investment managers (external managers).

MS AIML seeks to support the strategies being developed by its clients and parent to facilitate the transition to a low carbon economy and mitigate climate change risks through the implementation of medium and long-term initiatives.

MS AIML recognises that decisive action is required from businesses to limit the impact of climate change. As an asset manager on behalf of our clients, MS AIML aims to support our clients, as requested, in developing and implementing effective investment strategies to reflect this.

Over the last year, MS AIML has aimed to embed our use of monitoring metrics and analysis performed, as well as partnering with external data providers to further our understanding of portfolio exposures.

This information is regularly provided to clients as well as to internal MS AIML committees to provide oversight of climate related activity and to assist clients and the Board in their oversight of the business. This is an area which we continue to develop with ongoing discussions with external providers being carried out as we look to enhance our capabilities.

From a governance perspective, MS AIML has also sought to enhance the frequency and quality of climate related discussions within the business over 2024 and into 2025. The topic of climate change has been formally incorporated into the company's governance structure through the establishment of committees with a specific climate related remit, as well as updating terms of references and standing agendas to reflect requirements for climate reporting to the necessary committees and Board.

These activities have been enhanced and formalised to reflect the increased focus on climate change risks and opportunities facing MS AIML, its clients and its parent and to support all relevant parties in developing and achieving their strategies in this area. We will continue to make climate change a key area of focus during 2025.

We are committed to sharing our progress in these areas through preparing and publishing this TCFD report. This report details our approach to climate related governance, strategy, risk management and monitoring over the previous year.

Signed by:


Chris Place

Interim Chief Executive Officer, MS AIML

2. Strategy

MS AIML

MS AIML's strategy is to work with clients to support the development and implementation of their climate related investment plan requirements. We seek to achieve this through regular and proactive engagement with clients, parent, external managers and third parties to establish the mechanisms to implement these requirements. Further details are provided below and in the following sections as to how MS AIML interacts with clients and other parties and develops a suite of monitoring activities to support strategy development.

We also note that MS AIML is currently seeking to improve processes across the business as part of a firm-wide transformation project to help support better service delivery to our clients. Climate-related activity is being considered as part of this project and is incorporated into key workstreams. Future TCFD updates will seek to provide further details on this area.

MS&AD Group

MS AIML's parent has established specific investment exclusions and goals with regards to climate change – primarily with an aim to achieve net zero greenhouse gas emissions by 2050. These are available in further detail as part of MS&AD disclosures. As subsidiaries of the parent, MS AIML via our clients is required to consider these goals as part of the broader group targets. Currently MS AIML and other MS&AD companies are working with our parent to develop implementation initiatives which incorporate these group targets.

Clients

Our clients are ultimately responsible for any climate-related mandate of the portfolio which includes regulatory requirements. Clients have the final authority over any climate-related exclusions which may be implemented by MS AIML, in addition to any exclusions required by MS&AD group as above. Investment limits and tolerances are detailed in Client Investment Guidelines issued to MS AIML (and subsequently to external managers) for adherence by MS AIML. Where relevant these include climate related mandates.

When requested, we collaborate with our clients to help develop their climate investment strategy, however these strategies remain the responsibility of our clients.

To support strategy development we currently provide our clients with metrics to aid their oversight of climate exposures within their investment portfolios. Further details of these metrics are provided in section 5 of this document.

External Managers

Key to our business model is the use of external investment managers who are required to act in line with investment guidelines set by MS AIML's clients and within their own investment strategy as identified through manager selection by MS AIML.

At an external manager level, climate risks and opportunities are integrated into the wider investment process as part of research performed on all asset issuers as part of the asset selection process. This is alongside traditional factors such as financial stability and outlook to determine areas of potential risk and opportunity. These factors are also considered when performing any delegated functions, such as proxy voting.

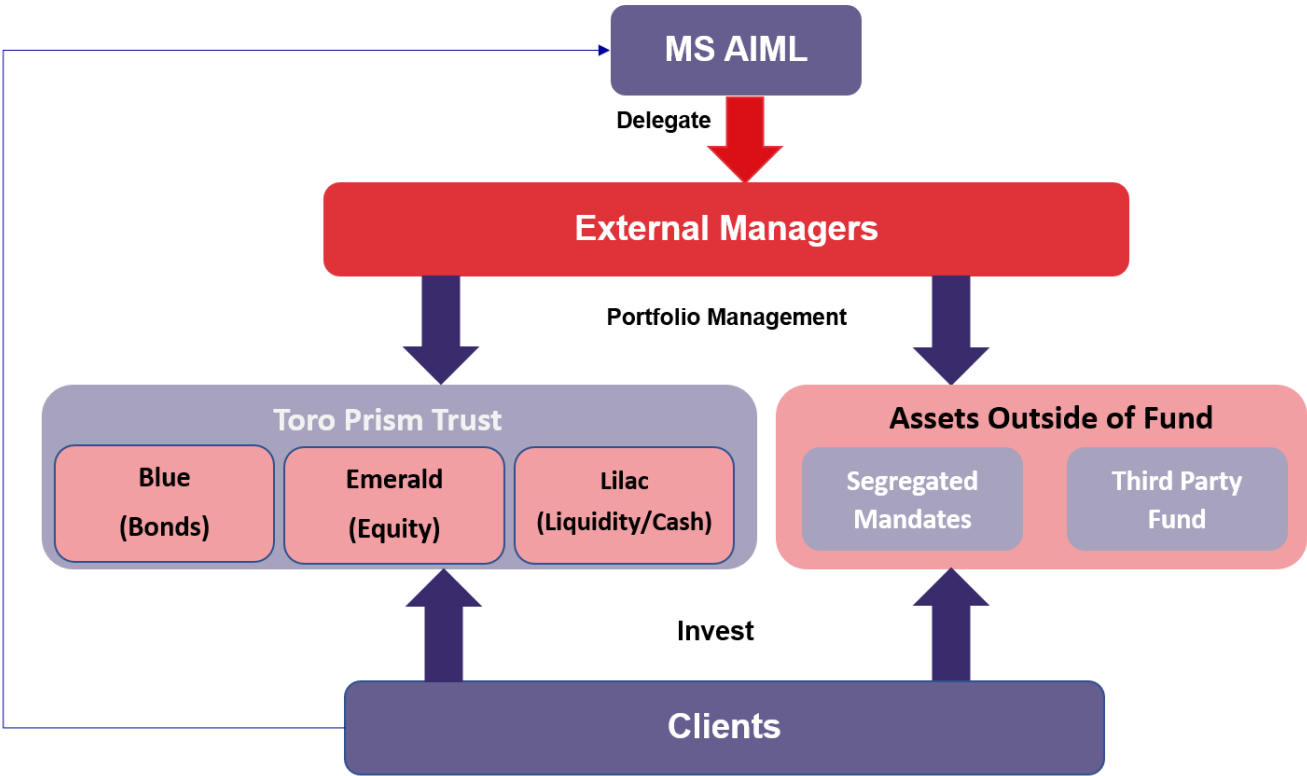
Investment Structure Chart

Below shows the investment process from MS AIML for assets within the Toro Prism Trust and assets held outside of the fund (AOF) through to our external managers and to our clients.

3. Governance

Oversight of climate-related risks and opportunities

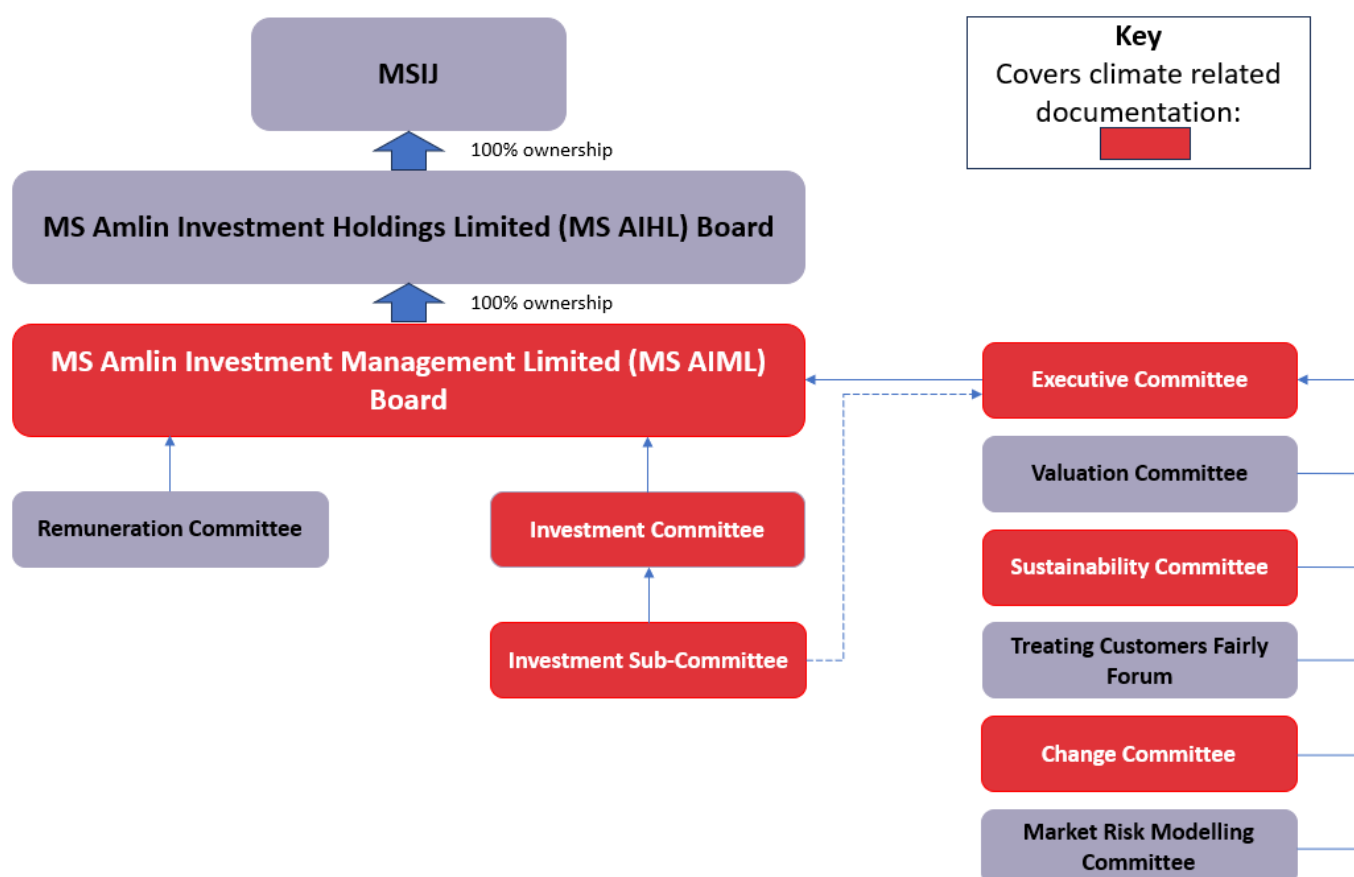
Climate related information is reported to and considered by MS AIML committees as detailed below. This information includes both qualitative and quantitative reporting to support governance and oversight of this area. This reporting supports the MS AIML Board in its responsibilities for overseeing



the risks and opportunities facing the business.

Governance Structure Chart

On the following page, the structure chart shows the ownership from MSI Japan ((MSIJ) (MS AIML’s Head Office)) to MS AIML committees.



MS AIML Climate-related Committees

MS AIML Sustainability Committee

- This is a sub-committee of the MS AIML Executive Committee. The committee meets at least quarterly.
- To recommend and initiate measures to ensure MS AIML is in alignment with the Task Force on Climate-related Financial Disclosures ('TCFD') requirements which set out how the company should report on the impact of climate change on the business.
- To review business specific metrics selected to provide information across a range of climate related areas in order to effectively monitor climate risk to MS AIML and to escalate any issues as appropriate.
- The committee has representation across all business areas through either membership or attendance.
- Standing agenda includes governance, risk management, client reporting and monitoring metrics all relating to climate (as part of a broader sustainability agenda).
- Climate risk is considered in the terms of reference in this committee.

MS AIML Executive Committee

- This is a sub-committee of the MS AIML Board. The committee meets at least quarterly.

- In addition to a broad agenda across all business areas, the Committee receives a summary paper on the matters covered by the Sustainability Committee. This covers key topics discussed at the meeting and any topics for escalation. See above.
- The Committee receives an ESG paper which includes climate-specific metrics.
- To approve the measures to be taken to ensure MS AIML is in alignment with the Task Force on Climate-related Financial Disclosures ('TCFD') requirements which set out how the company should report on the impact of climate change on the business.
- Climate risk is considered in the terms of reference in this committee.

MS AIML Remuneration Committee

- This is a sub-committee of the MS AIML Board. The committee meets at least quarterly.
- A broad range of factors are considered as part of remuneration setting. These implicitly include environmental, social and governance related topics.

MS AIML Board

- The Board meets at least quarterly and discusses topics across a range of area impacting MS AIML.
- The Board receives a summary paper on the matters covered by the Sustainability Committee. This covers key topics discussed at the meeting and any topics for escalation including climate-specific updates. See above.
- Relevant climate topics are referenced as part of this consolidated paper.
- Climate risk is considered in the terms of reference in this committee.

MS AIML Investment Committee

- This is a sub-committee of the MS AIML Board. The committee meets at least quarterly.
- Committee reviews information relating to MS AIML's investment strategy, approach and asset allocation decisions relating to client investment portfolios.
- Matters escalated from the Investment Sub-Committee are provided as necessary as well as a periodic ESG update.

MS AIML Investment Sub-Committee

- Sub-committee of the MS AIML Investment Committee. This committee meets at least quarterly.
- Committee reviews information relating to MS AIML's investment strategy, approach and asset allocation decisions relating to client investment portfolios.
- Review metrics selected to provide information across a range of climate related areas in order to effectively monitor climate risk to client and Toro Prism investments and to escalate any issues as appropriate.

MS AIML Change Committee

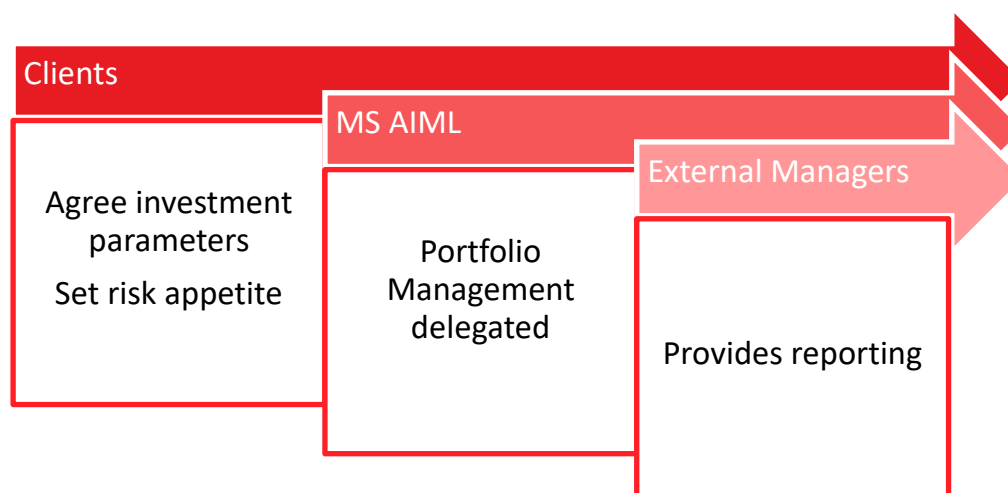
- This is a sub-committee of the MS AIML Executive Committee. The committee meets at least quarterly.
- Oversight of the delivery of the business change portfolio. Projects may include to Climate-related activity.

Note: Climate related investment information is also provided to MS AIML's clients' investment

committees to support their business strategies. MS AIML's client governance structures differ according to their internal models and are outside of the scope of this document.

Relationship Structure Chart

Below shows the relationship and reporting lines between MS AIML, our external managers and our clients.



External Parties

MS AIML is responsible for managing investment portfolios on behalf of clients and acting in accordance with client investment guidelines. Clients are responsible for setting their own strategy and this is then implemented by MS AIML via the use of external managers.

External Investment Managers

MS AIML is responsible for the oversight of external managers. This is performed through onboarding due diligence and ongoing monitoring and meetings. If an external manager is not fulfilling the requirements set out by MS AIML, this would be escalated to their relationship manager in the first instance.

External manager onboarding includes due diligence and screening interviews. This process has a broad sustainability focus, including a review of relevant climate related factors as appropriate to the manager and strategy MS AIML has set an expectation for all new external managers to be signatories to the UN-supported Principles for Responsible Investing (PRI). Signatories to the PRI attest on a regular basis to demonstrate their commitment to incorporating environmental, social and governance (ESG) factors into their investment decision making and ownership practices.

Ongoing oversight of the portfolio by MS AIML includes reviewing and discussing the external managers' climate related exposures. Monthly independent analysis and oversight of external manager climate risks such as Weighted Average Carbon Intensity (WACI) is completed, as well as reviewing and discussing the external managers' climate related exposures on at least a quarterly basis, through both ESG reporting received from the managers and bi-annual update meetings. Metrics used by MS AIML form ongoing oversight discussions with managers.

MS AIML controls allocation to all external managers and has the authority to reallocate assets to another external manager if required.

Clients

Our clients are ultimately responsible for any climate related mandate of their portfolios. This includes both client preference and regulatory required climate positioning.

Clients have ultimate authority over any climate related exclusions or targets which may be implemented by MS AIML, in addition to any exclusions required by MS&AD group. Any climate related mandate, limit or instruction is to be incorporated into the Client's Investment Guidelines and subsequently adhered to by MS AIML.

Clients are responsible for maintaining their own risk management policies and governance structures to support their oversight of investment activity as well as in relation to business activities such as financial planning.

Third Parties

MS AIML incorporates compliance monitoring via its third party administrator to provide monitoring against investment management limits set by clients.

MS AIML also engages with a number of external data suppliers to support our monitoring and reporting. Further details are provided in the Metrics section of this document.

4. Risk Management

MS AIML has established a firm-wide Risk Management Framework which consists of a suite of policies, standards, appetites, governance processes and procedures that provide the infrastructure to put risk management into practice. The framework is built into the core operating model of the business and forms part of the overall approach to internal control. It provides the infrastructure within risk governance and also sets out the processes required to sustain risk management across the business.

As part of the Risk Management Framework, risk is considered across multiple timeframes and impact types. Current risks to MS AIML are listed in the company's Risk Register, with risks which may manifest in the longer term included as part of Emerging Risk analysis. Risks to MS AIML's assets under management are considered as Investment Risks and managed separately in relation to their potential impact to clients as asset owners.

Risk Register

Climate risk to MS AIML is incorporated into the Risk Management Framework through its inclusion in the MS AIML Risk Register as a documented driver of key risks impacting the business. This relates to both physical and transition risk as appropriate.

MS AIML's risk register is the central repository of risks, and each risk is assigned a risk owner. The Risk Function regularly reviews the risk register to ensure that it adequately captures the risks that the company faces.

With consideration of their drivers, all risks are reviewed periodically by risk owners and the MS AIML Risk team on a five point impact vs likelihood scale which incorporates potential impacts such as financial, regulatory and strategic. The results of this are reported to the Board and considered as part of broader business discussions and planning.

Regulatory Risk

MS AIML considers climate related regulatory risks as part of a driver of Regulation Risk within our risk register.

Regulatory Risk is managed internally by MS AIML's Legal and Compliance team as well as external legal support to assist us in our readiness with regulations which include any climate regulation consideration.

Emerging Risk

Specific aspects of climate risk (such as physical or transition impacts) forms part of emerging risk analysis. An emerging risk is defined as an evolving potential hazard that MS AIML does not currently manage as a risk. These are seen as material risks that could significantly impact the company's future.

The emerging risk process considers risks that may materialise over a longer time horizon, in excess of the risks identified on the risk register. This longer time horizon is also considered as part of climate scenario analysis which is provided in more detail in the following section. Impacted timelines are also incorporated implicitly as part of asset research performed at the discretion of external managers as part of the asset selection process.

All emerging risks are reviewed and assessed periodically. Key emerging risks are reported to the Board with further analysis or actions established as required.

Investment Risk

Climate risk to MS AIML’s asset portfolio is monitored through a range of metrics and discussions with external managers. Further detail relating to monitoring and metrics is provided in the following section.

5. Monitoring and Metrics

MS AIML has developed several metrics internally and partnered with external data providers to support the monitoring of the investment portfolio.

These metrics have been selected to provide information across a range of climate related areas in order to effectively monitor climate risk to client investments. Data for the below metrics is received from both publicly available sources as well as by specialist providers that MS AIML has partnered with.

The metrics (on the following page) are regularly reported to clients and MS AIML committees and Board to support oversight of climate risk. We note that additional metrics were included in last year’s TCFD report however these have been omitted from this version as the below metrics are given greater consideration as part of portfolio and external manager oversight.

MS AIML continues to review the following metrics and seeks areas of improvement. Over the coming year, we aim to develop our infrastructure with the support of our external data providers and through the transformation project noted in the Strategy update to enhance our climate metrics which will support our oversight of this area.

Weighted Average Carbon Intensity (WACI)

The Carbon Intensity of each security is calculated by dividing the total carbon emissions (combining Scope 1, Scope 2 and Scope 3) of the issuer by its revenue (for equities and corporates) or GDP (for sovereigns and FX). Data for WACI calculations is sourced from Bloomberg (corporate bonds), MSCI, and the World Bank (sovereign bonds). Fund-level WACI scores for the Toro Prism Trust and external manager portfolios and the latest data for each security has been taken for our assessment.

WACI has been chosen as our primary climate risk metric as it provides 100% coverage across our assets under management and is underpinned by the Partnership for Carbon Accounting Financials (PCAF) Framework.

MSCI provides an approximate scale for the relative severity of the carbon intensity scores:

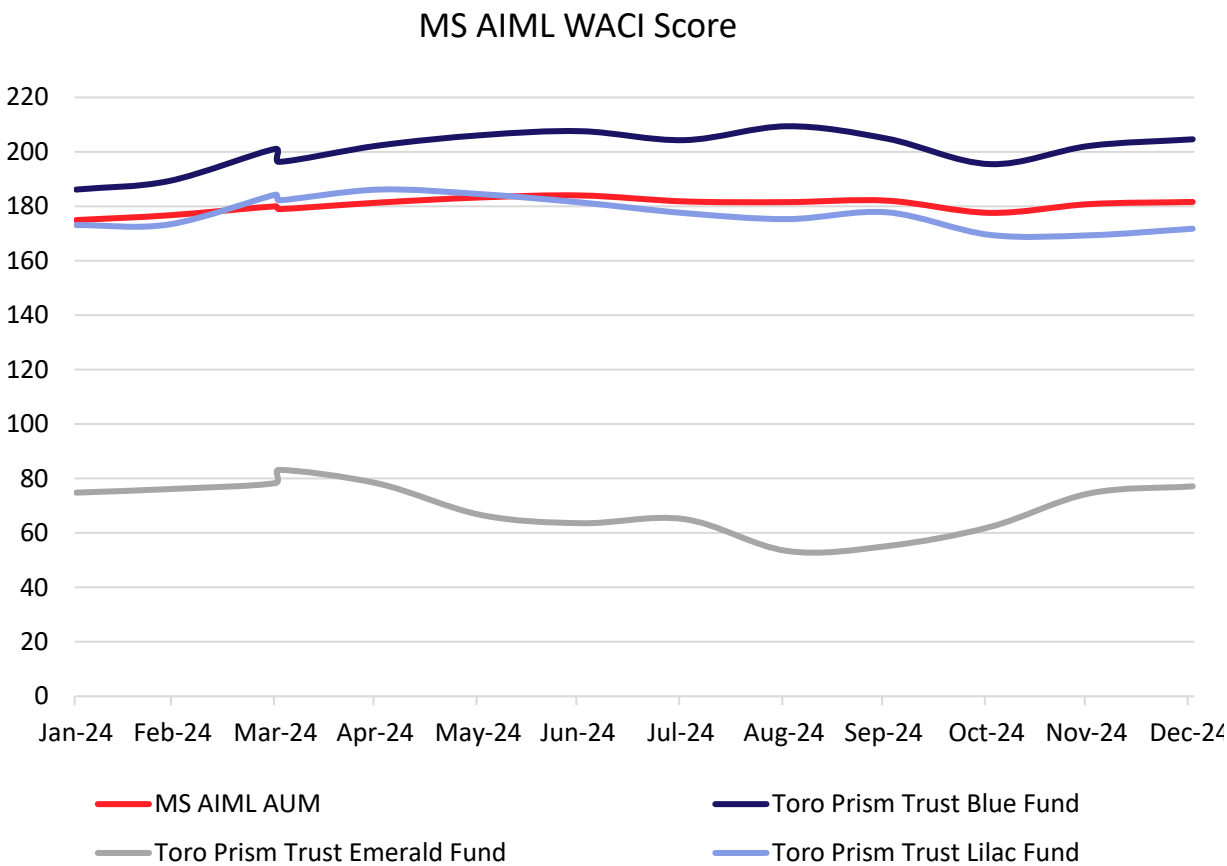
Rating	WACI Score
Very Low	<50
Low	50-100
Medium	100-250
High	250-500
Very High	500<



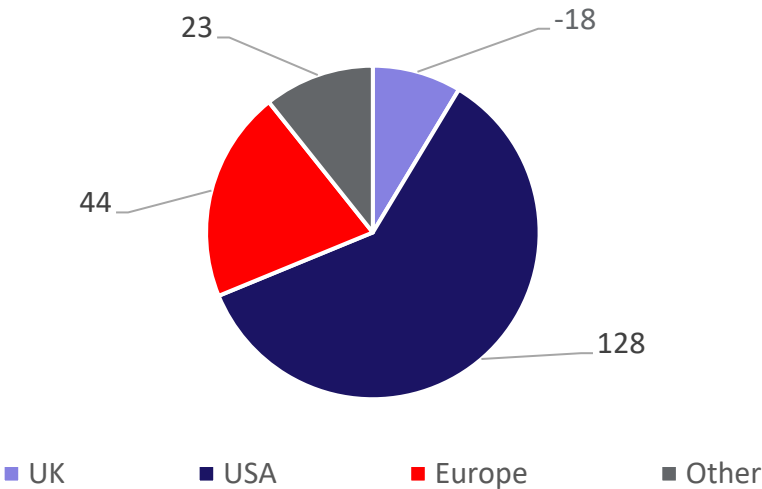
The figures below provide details of MS AIML and Toro Prism Trust’s WACI scores as well as a more detailed breakdown of contributors to those scores. WACI scores are a function of both carbon emissions and size of holdings within the portfolio.

In comparison to the previous figures reported in the 2023 TCFD report, we note that there has been minimal change in the overall score with fund ratings remaining stable and no change to rating categories.

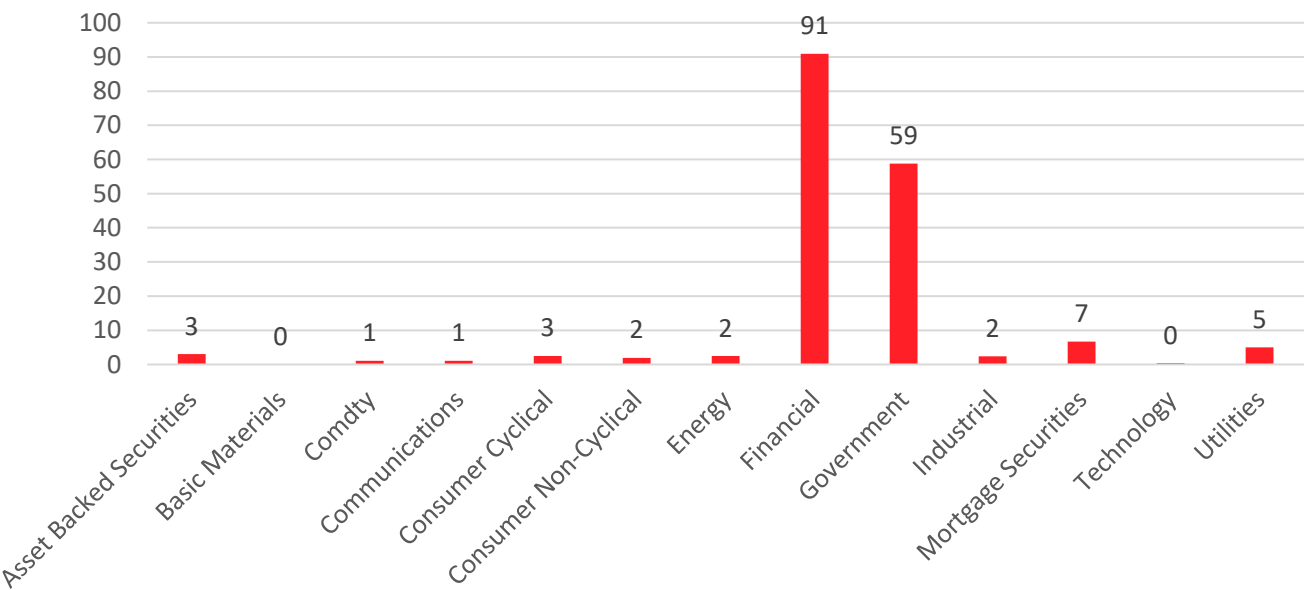
Further charts do highlight that some underlying exposure factors have shifted over the year, however these have not driven a significant change to overall scores. Notably there has been an increase in the contribution from US assets and a reduction for UK assets, this is predominantly a function of the weighting changes to those countries from asset allocation decisions. There have been no significant changes to sector contribution.



Geographic contribution to total MS AIML WACI score



Sector contribution to total MS AIML WACI score



Network for Greening the Financial System (NGFS)

The NGFS seeks to share best practice around climate risk management in the financial sector. The NGFS has designed a set of hypothetical scenarios to provide a reference for understanding the physical and transition risk from climate change. These scenarios have been used as the primary climate scenario analysis for MS AIML’s investments as they aim to provide an industry standard outlook.

- **Orderly Transition / Early action** - Early and decisive action by governments, companies and consumers is targeted at gradually reducing global emissions. These measures prove adequate in restraining global average temperature increases to below 2°C.

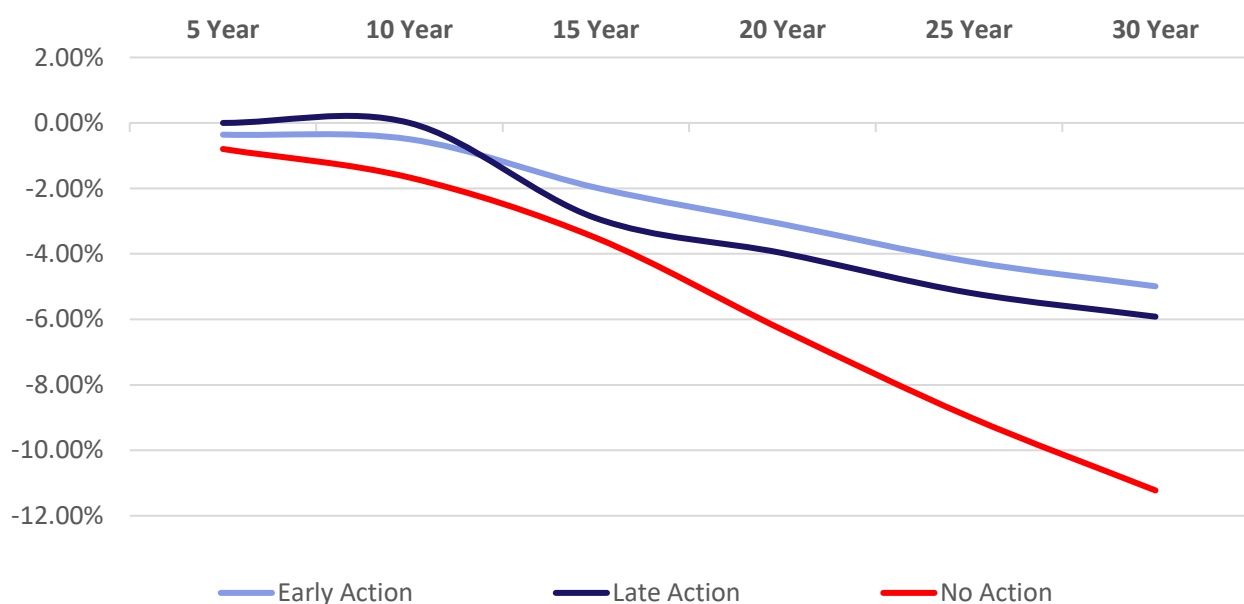
- **Disorderly Transition / Late action** - Action on climate change is delayed by a decade and companies and consumers adapt their behaviour in response to these substantial shifts. This brings about substantial disruption to the economy. Under this scenario, physical risks escalate more rapidly than in the early policy action scenario, and transition risks become severe.
- **Hot House World / No action** – Governments, companies and consumers do not implement any new policies addressing climate change beyond those already announced.

MS AIML has applied these scenarios as of the end of 2024 to show projected impacts. The results provided below are relative to an NGFS counterfactual scenario which does not include any specific damage from climate change.

A key change to the methodology was made for the 2024 TCFD report as the below figures are provided on a Toro Prism fund-only basis. This is in comparison to the previous year's report which included all assets held by clients including those outside of Toro Prism funds. As MS AIML is the lead portfolio manager for Toro Prism funds, unlike assets outside of funds, this was considered to be a more appropriate basis for this disclosure.

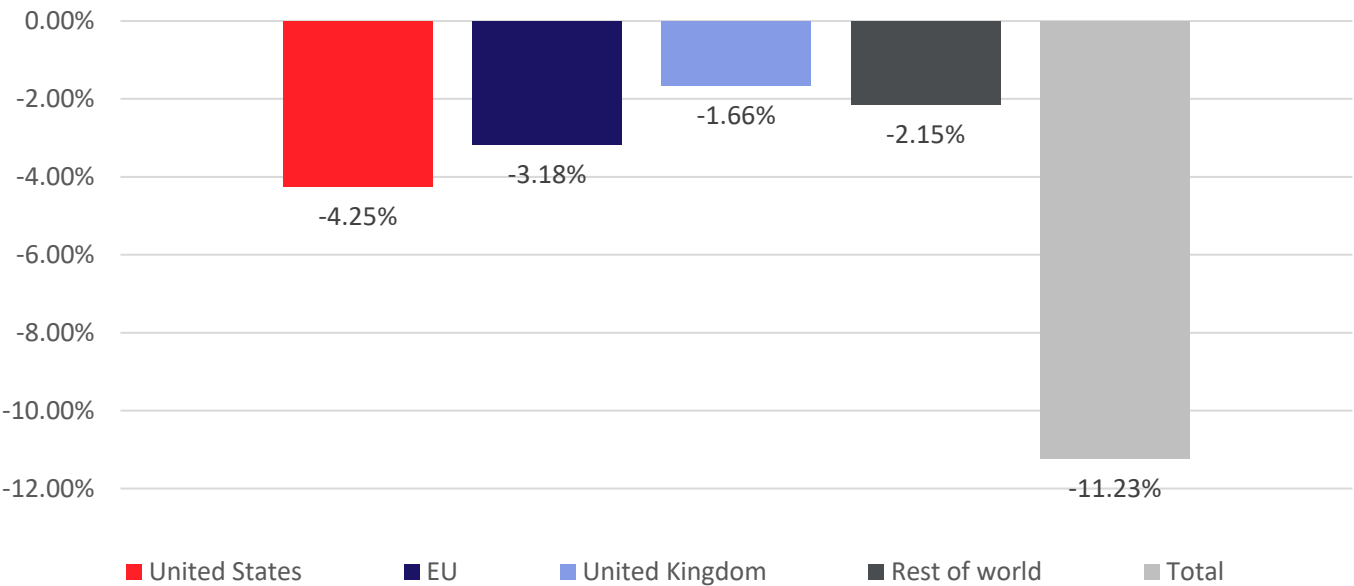
As a result, in comparison to the 2023 reported figures, we note a lower impact from the scenarios in 2024. This is primarily driven by assets held separately by clients outside of Toro Prism, notably Property. Underlying exposures as shown by the following charts are broadly in line with those identified through the WACI scores above.

Diverse trajectories across scenarios

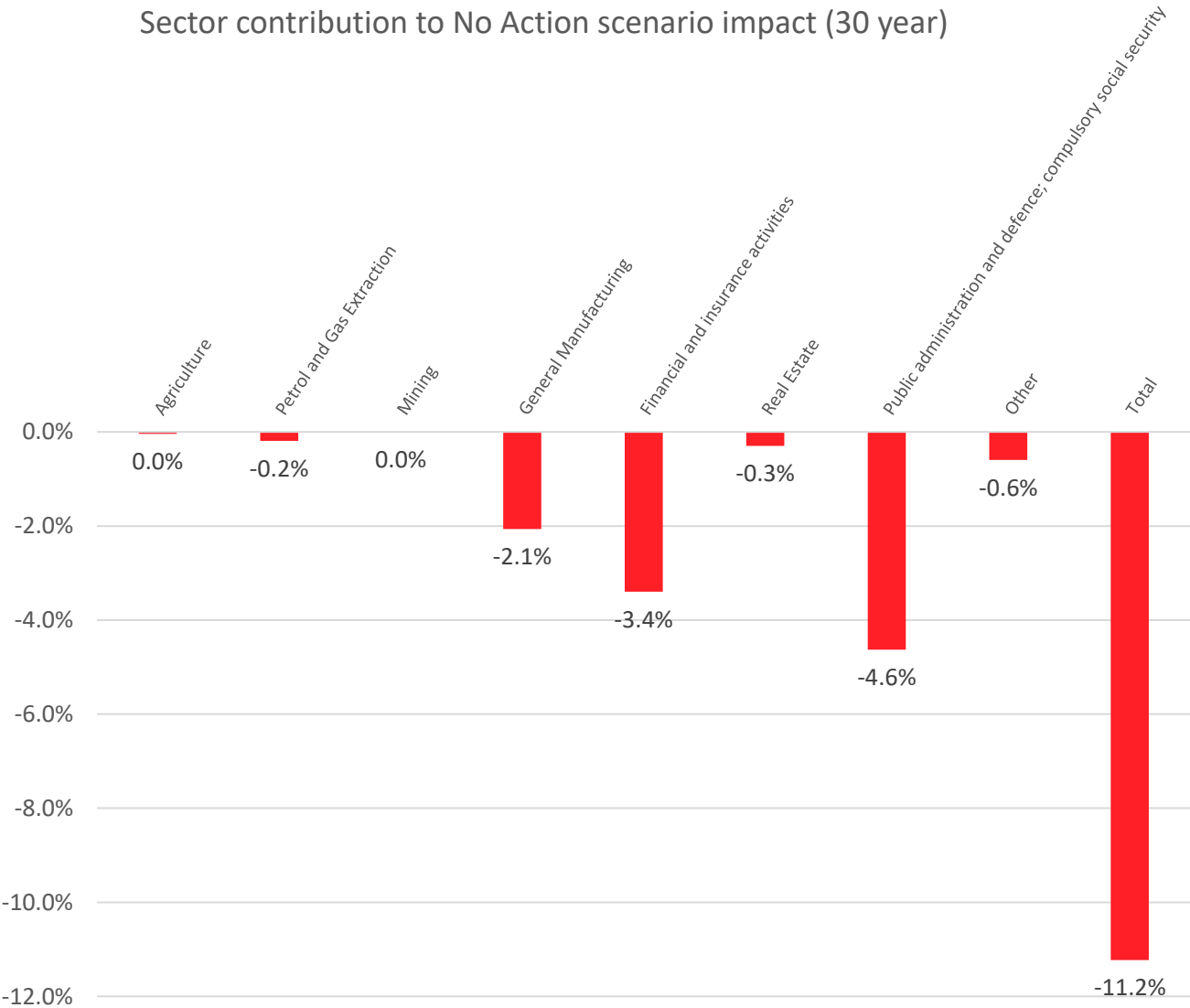




Geographic contribution to No Action scenario impact (30 year)



Sector contribution to No Action scenario impact (30 year)



ESG Score

Using Environmental Social and Governance (ESG) data from an external provider (Sustainalytics), MS AIML calculate a composite ESG score for each underlying asset. Sustainalytics' ESG Risk Ratings measure a company's susceptibility to industry-specific material ESG risks and its effectiveness in mitigating them.

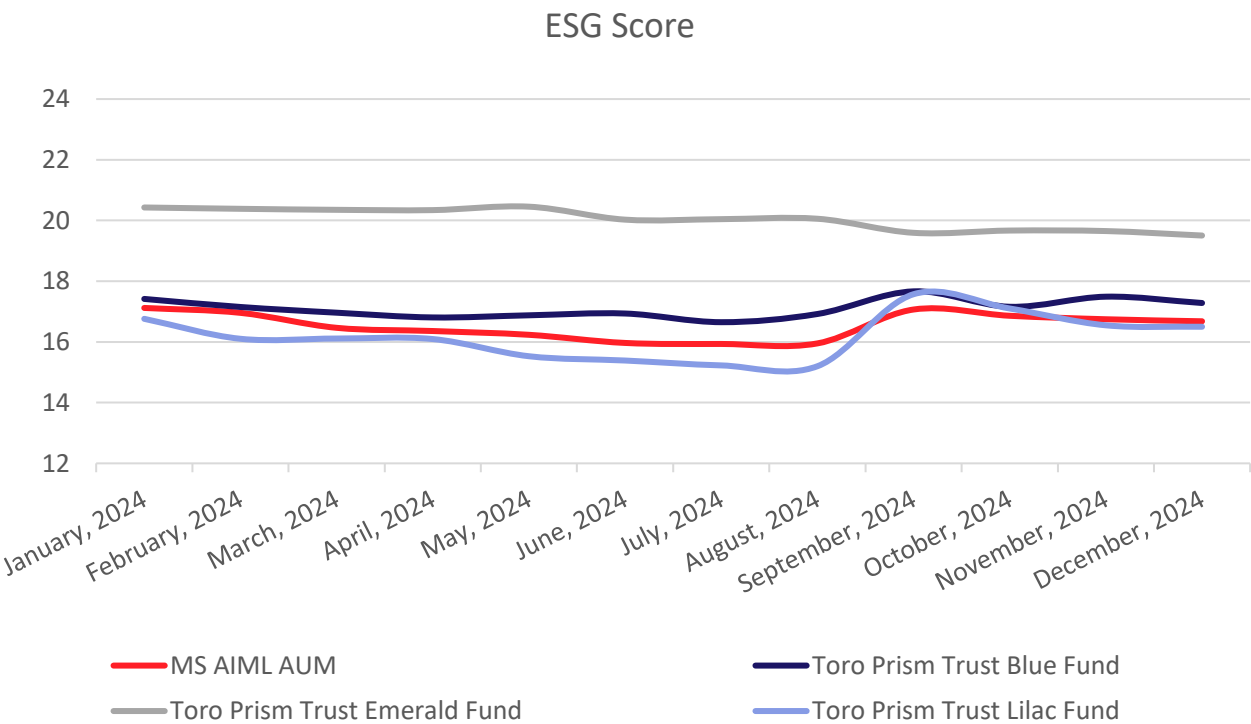
This figure is only available as a combined ESG score with climate factors incorporated into the Environmental aspect of this rating. MS AIML does not separate each underlying component of ESG but reports this score to clients and MS AIML committees.

MS AIML considers this score as an effective method of considering broader risk areas that may impact the portfolio, supplementing the more detailed climate related analysis performed as part of the other metrics referenced above.

We categorise ESG risk severity into five distinct levels that could influence a company's overall enterprise value.

Rating	ESG Score
Negligible	0-10
Low	10-20
Medium	20-30
High	30-40
Severe	40+

We note that at the start of 2024 the Emerald fund was rated Medium (20-30). There has since been an improved trajectory and as at Q4 2024 the fund is now rated as Low (10-20). Other funds have seen some movement in scores over the year but ultimately have remained relatively stable with no change in rating.



MS AIML Scope 1, 2 and 3 Emissions Data

In addition to the above metrics to track climate risks across MS AIML's assets under management, the company is also monitoring internal emissions from its operations.

This is calculated as a function of the overall scope emissions for the broader MS Amlin entities based on headcount. MS AIML operates from a shared building and as such, emissions calculations are subject to the managing agent's methodology.

The below table provides data on MS AIML's scope 1, 2 and 3 emissions for 2024.

Scope	MT CO ₂ e
1	9.24
2	11.27
3	19.34

6. Compliance Statement

TCFD Recommendation		Summary of MS AIML's Disclosure
Governance	a) Describe the board's oversight of climate-related risks and opportunities.	MS AIML's Board is informed of climate related matters through regular direct reporting and via sub-committees. Please refer to pages 5-7 for additional detail.
	b) Describe management's role in assessing and managing climate-related risks and opportunities.	Climate risk and opportunity information includes both qualitative and quantitative reporting. This is provided to Management for oversight and to clients to support strategy development. Please refer to pages 3-7 for additional detail.
Strategy	a) Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	Climate risks and opportunities are identified at a portfolio level through monitoring metrics. At the security level these are identified by external managers through asset due diligence. Please refer to pages 3, 11-15 for additional detail.
	b) Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.	As asset owners, MS AIML's clients are responsible for determining their own climate related investment strategy. MS AIML supports strategy development through providing regular monitoring information which includes climate risk and opportunity exposures. Please refer to page 3 for additional detail.
	c) Describe the resilience of the organization's strategy, taking	Scenario analysis is performed for the overall MS AIML assets under management and for

TCFD Recommendation		Summary of MS AIML's Disclosure
	into consideration different climate-related scenarios, including a 2°C or lower scenario.	client specific portfolios to support client investment strategy development. Please refer to pages 13-14 for additional detail.
Risk Management	a) Describe the organization's processes for identifying and assessing climate-related risks.	Climate risk is incorporated into MS AIML's risk framework as a driver of existing risks to the business as well as being considered as part of separate analysis of emerging and investment risks. Please refer to pages 9-10 for additional detail.
	b) Describe the organization's processes for managing climate-related risks.	Risks to MS AIML are reviewed for materiality of impact and likelihood of occurrence with mitigating actions developed as required. Management plans for risks to client investment portfolios are developed by clients with support from MS AIML. Please refer to pages 8-10 for additional detail.
	c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	MS AIML risk management framework in place which includes details of risk identification, assessment and management processes. Climate risk is considered in line with other risks impacting the business. Please refer to pages 9-10 for additional detail.
Metrics & Targets	a) Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	Metrics include carbon intensity, climate scenarios, temperature alignment and water stress. Please refer to pages 11-16 for additional detail.
	b) Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related risks.	Emissions data provided. Please refer to page 16 for additional detail.
	c) Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets	Targets set by MS&AD Head Office for the MS&AD group and also in development by MS AIML's clients. Please refer to pages 3 for additional detail.

The table above is meant to provide a summary of how MS AIML has approached the TCFD recommendations. The disclosures in the report comply with the requirements under the FCA Sourcebook chapter ESG 2.2 *TCFD Entity Report*.

DocuSigned by:

Grace Suleyman

7D1EB31CA6CB4FD...

Grace Suleyman
Compliance Oversight Officer
MS Amlin Investment Management Limited
Date: 24/06/2025