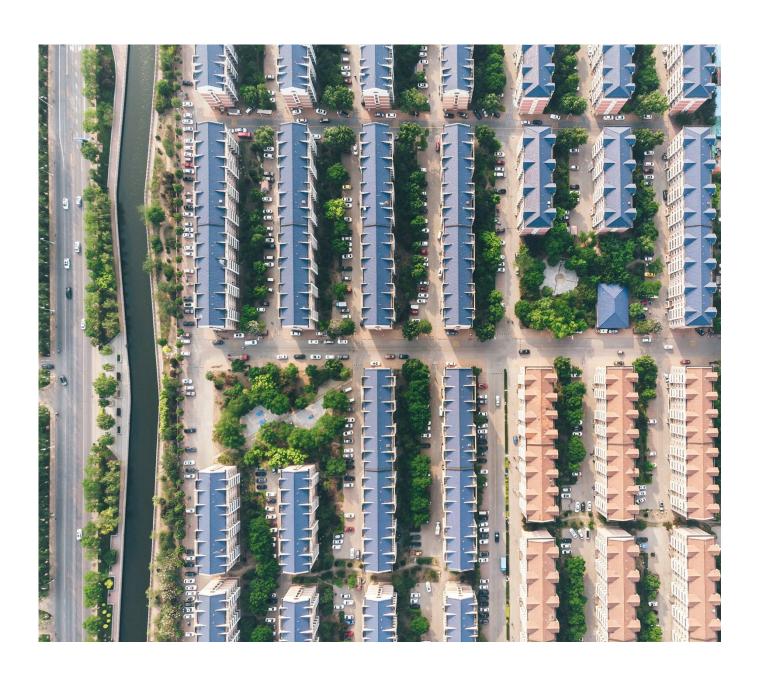
Baillie Gifford

Baillie Gifford UK Growth Trust plc

TCFD Climate Report for the year ending 31 December 2023

Prepared using the Task Force on Climate-related Financial Disclosures (TCFD) recommendations.



Introduction

Baillie Gifford UK Growth Trust plc (the 'Trust') is a high-conviction UK equity investment trust, managed by Baillie Gifford, that invests in companies that we believe have enduring competitive advantages and which will grow their earnings faster than the market average. Our goal as Managers is to identify these companies through 'bottom-up' stock selection and invest in them for periods of at least five years.

This report explains the portfolio managers' approach to addressing climate-related risks and opportunities through the investment process and describes how they may impact the portfolio. It also includes data and metrics to provide useful additional information. It is expected the content, format and data will evolve in future versions. The report excludes data on private companies.

Governance and management of climate-related risks and opportunities

Details of Baillie Gifford's approach to governing and managing climate-related risks and opportunities across the firm can be found in the entity level <u>TCFD Climate Report</u> on the Baillie Gifford website. This includes descriptions of the roles and responsibilities of relevant Boards and Committees and integration into overall risk management.

For the Trust, the management of climate-related risks and opportunities is the responsibility of the investment team. They undertake tailored research and engagement with specific holdings where they feel that climate-related risks and opportunities could be particularly material to investment outcomes. They also aim to assess all holdings at least annually using the Baillie Gifford 'Climate Audit' process. The results of this are reported in the metrics section of this report and further detail on the process can be found in Baillie Gifford's entity level <u>TCFD Climate Report</u>.

Implications of climate change for strategy

Climate change and global efforts to address it pose potential 'physical' and 'transitional' risks and opportunities for holdings in the portfolio. Physical factors can arise from changes to the climate and weather patterns, while transitional factors can arise because of new policies, technologies or consumer behaviours.

Assessing the potential influence of these risks and opportunities on investment returns is part of the portfolio managers' long-term investment style. However, this is a complex task and they expect their views to continue to change over time. To help them, they assess different versions of the future using a technique called qualitative scenario analysis. At present, they believe this is more useful than quantitative scenario analysis (which is dependent on numerical data and modelling) because it allows them to explore the complexities and knock-on effects of future pathways.

Baillie Gifford has developed three qualitative climate scenarios in partnership with two external organisations: The Deep Transitions project (a collaboration between the universities of Utrecht and Sussex) and Independent Economics (a macroeconomics consultancy). The scenarios are based on NGFS (Network for Greening the Financial System) 'orderly', 'disorderly' and 'hothouse' world scenarios. More detail has been added in areas such as human behaviour, technology adoption and societal change. This is explained further in articles on the Baillie Gifford website. The qualitative scenarios describe three different versions of the future:

	Smooth, orderly transition	Volatile, disorderly transition	'Hothouse' world
	(1.5C by 2100)	(<2C by 2100)	(>2.5C by 2100)
Climate	Significant but managed	Worsening impacts	Major challenge to resilience;
	change; resilience retained		regional collapses in
			food/water systems
Politics	Coordination and trade	Initially divided, then more	Fractured; protectionism rises
	supports transition	united	
Policies	Well-signalled and proactive;	Initially diverse, then higher-	Fragmented; supporting
	early action	cost and sometimes disruptive	incumbents then biased to
			adaptation
Society	Rapid shifts in behaviour;	Uneven development; self-	Individualistic; higher levels of
	circular and 'just transition'	reliance; inequality	inequality, migration and
			conflict
Energy technologies	Technology tipping points	Fragmented energy system	Fossil fuel dependency
	reached early, influencing	limits cost reductions;	extended, costs higher, late-
	many sectors	innovation comes later	stage radical solutions
Adaptation responses	Varied and successful;	Unequal; significant fiscal drain	Critical: agriculture, water,
	managed across the global	in some countries	healthcare, climate defences
	economy		
Finance	Multi-lateral financial reform	Contradictory investments;	Greater variability; insurance
	supports investment flows to	market shocks from abrupt	contracts; adaptation costs pull
	transition	policy change	investment from elsewhere

The portfolio managers are able to use these scenarios to explore possible implications for holdings in the portfolio over the short, medium and long term, which are described below. These timeframes have been chosen because they are relevant to the portfolio's investment timeframes, though it is recognised that changes to the climate happen over much longer timeframes.

Short-term risks and opportunities (0-3 years)

Over the next few years, climate-related risks for most portfolio holdings are more likely to be transitional than physical. Although evidence shows that climate change is already making weather events more severe, this is unlikely to significantly impact the whole portfolio within a three-year timeframe, even under a hothouse world scenario. However, physical impacts could be significant for some companies.

Trends in technology, policy and markets are likely to have more of an impact on the portfolio over this timeframe. Under both orderly and disorderly transition scenarios, there may be significant opportunities for holdings that are directly helping to drive the decarbonisation of the economy. However, in the disorderly scenario this is likely to be more volatile across different regions and sectors. Key enablers of decarbonisation in the portfolio including Volution Group and companies showing other forms of strategic leadership such as Auto Trader and Burberry should benefit. They may avoid regulatory penalties, gain access to technology and reinforce their brands.

Conversely, both orderly and disorderly scenarios may increase transitional risks for companies with more highly carbon intensive products, processes or supply chains. Although the timing will vary in different markets, such companies may face higher costs or risk customer loss as emissions regulations tighten and social perspectives shift. In 2023 we engaged with holdings such as Rio Tinto and Ashtead to understand more about their plans to address these risks.

Under the hothouse world scenario, the risks and opportunities described above are less likely to accrue over the short term. For high emitters there may even be financial advantages to delaying plans to reduce emissions or diversify business models. However, the portfolio has limited exposure to companies in this position.

Medium-term risks and opportunities (3-10 years)

Over the medium term, the impacts of orderly and disorderly transitions may diverge. Under an orderly transition, there are likely to be significant opportunities at a global scale for companies providing climate solutions and those that can reduce their emissions substantially this decade. Under a disorderly transition, these opportunities may be reduced as regional diversity in climate policy introduces additional complexities for companies to navigate.

Meanwhile, the physical impacts of climate change could become more widespread, especially under the hothouse world scenario. For the portfolio as a whole, the geographical and sectoral mix of holdings may help to provide some resilience. However, the portfolio holds some companies that are reliant on complex international supply chains such as Renishaw and Ashtead.

Long-term risks and opportunities (10+ years)

Assessing risks and opportunities to the portfolio over the long term is challenging due to the uncertainties involved. However, under a hothouse world scenario it is anticipated that physical climate impacts become the main climate-related risk to returns. Under this scenario, the impacts on people and economic activity are likely to affect most holdings in the portfolio. There may, however, be some opportunities for companies whose products and services assist with climate adaptation.

Under orderly or disorderly transition scenarios, the impacts on the portfolio in the long term may become even more significant. Risks and opportunities associated with new technologies and markets may become even more material as the 'winners' of the transition emerge, causing the old to fall away. Under a disorderly scenario, regions of the world that were delayed in their transition might need to catch up, offering new opportunities for transition-aligned companies. However, the rushed nature of this process may pose risks due to abrupt policy changes and asset retirement.

Key Metrics (as at end December 2023)

Emissions scopes and units

The global standard for measuring entities' greenhouse gas emissions is the Greenhouse Gas Protocol. It contains different 'scopes' of emissions, which are used in this report:

- Scope 1: Emissions produced directly by the entity, typically through the combustion of fossil fuels on site.
- Scope 2: Emissions that occur due to energy used by the entity, often through the off-site generation of electricity in a power station.
- Scope 3: Emissions that occur somewhere in the entity's 'value chain' as a result of its activities. There are 15
 different categories including those associated with the raw materials an entity uses and the use of its sold
 products. Emissions from transport, distribution and business travel are also included.
- Material Scope 3: An additional category of 'material' scope 3 emissions is also added to this report in line with
 the recommendations of the Partnership for Carbon Accounting Financials (PCAF). Material scope 3 emissions are
 the scope 3 emissions from entities operating in certain sectors where such emissions are particularly significant.
 In the 2022 reporting year this covered the oil and gas and mining sectors, however for the 2023 reporting year it
 also includes the transportation, construction, buildings, materials and industrial activities sectors, per PCAF
 guidance.

All emissions metrics use CO_2e as the unit of greenhouse gases. Carbon dioxide (CO_2) is the most prevalent greenhouse gas but there are others such as methane which have different levels of warming impact per tonne of emissions. Because of this, it is common for CO_2e to be used as a common unit to refer to all greenhouse gases emitted by an entity. Its value is equivalent to the total amount of CO_2 that would need to be emitted to achieve the same level of warming impact as the CO_2 plus other greenhouse gases emitted.

Core emissions metrics

The metrics in this section include the Total Emissions, Carbon Footprint and Weighted Average Carbon Intensity (WACI) of the portfolio as required by the UK Financial Conduct Authority's (FCA) product-level climate disclosure rules. More explanation of all the metrics used can be found in the tables themselves and footnotes.

Data availability

Data for some holdings is currently unavailable from the data suppliers. The metrics presented in this section may therefore not relate to the entire portfolio, particularly where holdings are not listed on a stock exchange. Cash and derivatives are presently excluded. For emissions data, details are provided on whether data is reported, estimated or unavailable in the 'Emissions data coverage' table. The disclosure of metrics associated with the portfolio managers' own assessments of holdings' targets and transition role is intended to help address gaps in data from external data suppliers, and Baillie Gifford will continue to explore additional solutions in future.

Additional metrics

Baillie Gifford has included additional metrics that may be useful in assessing potential climate-related risks and opportunities to the portfolio. These include their assessment of holdings' net zero targets and their transition role, which is based on their own research and analysis. In addition, they provide metrics on exposure to material sectors, fossil fuels and alignment with the Science Based Targets initiative.

FCA rules also require Baillie Gifford to determine if a portfolio has concentrated or high exposures to carbon intensive sectors and if so to include quantitative scenario analysis metrics. Such portfolios are defined by Baillie Gifford as those with either: 1) a WACI (on a Scope 1, 2 & material Scope 3 basis) above that of its respective financial performance benchmark or the MSCI ACWI index, or 2) a higher level of exposure to holdings generating more than 5% revenues from fossil fuels than its respective financial performance benchmark index or the MSCI ACWI index.

For such portfolios, they also include Climate Value-at-Risk metrics in this section, provided they can obtain data for more than 70% of the portfolio by AUM) from the data suppliers. However, unless specifically required, Baillie Gifford has chosen not to provide Climate Value-at-Risk metrics for all portfolios as they believe data and methodology constraints mean they are not practicable for widespread use and potentially could be inaccurate or misleading. They also do not provide Implied Temperature Rise metrics for the same reasons. They continue to engage with data providers as these metrics evolve.

Year-on-year changes

In line with the requirements of the UK FCA, Baillie Gifford has included values for previous years alongside the most recent values for most metrics. It is important to be aware that any changes in year-on-year metric values may happen for several different reasons including changes to the portfolio composition, data re-adjustments by the data suppliers, new data being available to the data suppliers, as well as underlying changes within the holdings themselves.

Benchmarks

Where applicable, Baillie Gifford has provided metrics for the financial benchmark used by the portfolio for comparison purposes. The benchmark used for this portfolio is the FTSE All-Share.

Emissions metrics

2022	2023
Portfolio	Portfolio
5,135	5,266
69,076	47,660
105,148	75,443
110,283	80,709
	Portfolio 5,135 69,076 105,148

Source: Baillie Gifford, MSCI, FactSet

Carbon footprint of the portfolio

The carbon footprint of the portfolio represents the aggregated GHG emissions per million £/\$ invested and allows for comparisons of the	2022 2023			
carbon intensity of different portfolios.	Portfolio	Benchmark	Portfolio	Benchmark
Scope 1&2 emissions (tCO ₂ e) per \$m invested	14	81	14	67
Scope 1,2 & material Scope 3 emissions (tCO ₂ e) per \$m invested	194	759	124	736
Scope 1,2&3 emissions (tCO₂e) per \$m invested	309	877	210	814

Source: Baillie Gifford, MSCI, FactSet

Weighted average carbon intensity (WACI) of the portfolio

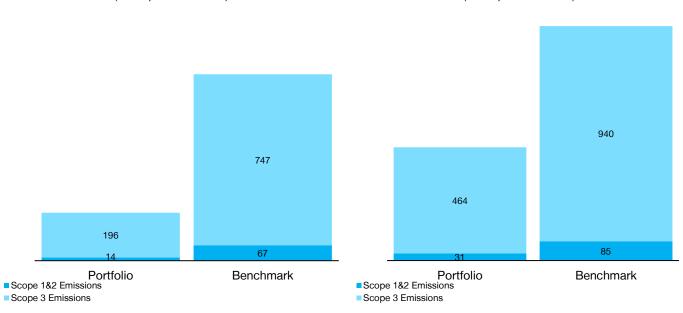
The WACI of the portfolio represents the aggregated carbon intensities per \$m revenue of the companies in a portfolio, scaled by size of holding. The WACI metric therefore helps measure a portfolio's exposure to high carbon intensity companies and can be used for comparisons with other portfolios.

WACI metric therefore helps measure a portfolio's exposure to high carbon	2022		2023	
intensity companies and can be used for comparisons with other portfolios.	Portfolio	Benchmark	Portfolio	Benchmark
Scope 1&2 emissions (tCO₂e) per \$m revenue	35	119	31	85
Scope 1,2 & material Scope 3 emissions (tCO₂e) per \$m revenue	401	1,004	296	821
Scope 1,2&3 emissions (tCO ₂ e) per \$m revenue	681	1,811	495	1,024

Source: Baillie Gifford, MSCI, FactSet

Carbon Footprint of the portfolio (tCO₂e per \$m invested)

Weighted Average Carbon Intensity (WACI) of the portfolio (tCO₂e per \$m revenue)



All figures are rounded, so any totals may not sum.

Emissions data coverage for the portfolio

These metrics are intended to provide a guide to the level of data coverage for portfolio emissions metrics. For reasons of consistency, Baillie Gifford sources all emissions data from its data provider. The metrics show the level of reported vs. estimated vs. unavailable data for different emissions scopes for the portfolio.

It is important to note that the data used for Scope 3 emissions is all estimated. This is because whilst some holdings do report Scope 3 emissions, this typically does not cover all emissions categories within Scope 3, meaning that reported data is not consistent across companies. Estimated Scope 3 data covers all relevant Scope 3 categories and is therefore more consistent.

For additional context, Baillie Gifford also includes the percentage of total

Portfolio	Benchmark		
	Denominark	Portfolio	Benchmark
77	89	88	92
14	4	10	2
10	7	2	6
90	93	95	94
10	7	5	6
69	85	74	86
	77 14 10 90 10	77 89 14 4 10 7 90 93 10 7	77 89 88 14 4 10 10 7 2 90 93 95 10 7 5

Source: Baillie Gifford, MSCI, CDP, FactSet

Additional insight metrics

Exposure to 'climate material' sectors

This metric is intended to show the proportion of the portfolio invested in companies operating in sectors that are materially relevant to addressing climate change. These sectors may be exposed to higher levels of climaterelated risks and opportunities. The definition uses the TCFD 'carbon related assets' definition, ie any company operating in the Energy, Transportation, Buildings and Materials, Agriculture, or Food and Forests sectors, mapped by GICS sub-industry.

% of total AUM invested in companies in 'climate material' sectors

20	022	20	023
Portfolio	Benchmark	Portfolio	Benchmark
12	39	12	38

Source: Baillie Gifford, FactSet

Exposure	to	fossil	fuel	activities

These metrics show the exposure of the portfolio to any companies generating at least 5% of their revenues from fossil fuel activities. This is broad metric which can include companies in fossil fuel sectors and thos operating mainly in other sectors.

generating at least 5% of their revenues from fossil fuel activities. This is a broad metric which can include companies in fossil fuel sectors and those	20	2022		2023	
operating mainly in other sectors.	Portfolio	Benchmark	Portfolio	Benchmark	
% of total AUM invested in companies with > 5% revenues from oil and/or gas activities ¹	0	14	0	15	
% of total AUM invested in companies with > 5% revenues from thermal coal mining and sale ²	0	0	0	3	
% of total AUM invested in companies with > 5% revenues from thermal	0	0	0	0	

Source: Baillie Gifford, MSCI, FactSet

coal power generation

Transition alignment metrics

Assessment	of holdings'	net zero	targets	through the	'Climate Au	dit' process
/ 1000001110111						

These metrics provide insight into Baillie Gifford's own assessment of holdings' emissions reduction targets, strategy and progress towards achieving them. The metric is based on their 'Climate Audit' and the state of the stat	2022	2023
assessment, which is explained in more detail in Baillie Gifford's entity level TCFD Climate Report.	Portfolio	Portfolio
% of total AUM with targets assessed as 'leading' (ie holdings with targets, strategy and progress in line with an appropriate 1.5C-aligned pathway)	43	55
% of total AUM with targets assessed as 'preparing' (ie holdings preparing targets and strategy in line with an appropriate 1.5C-aligned pathway)	35	39
% of total AUM with targets assessed as 'lagging'3 (ie holdings with little evidence of preparing targets and strategy in line with an appropriate 1.5C-aligned pathway)	23	6
% of total AUM with targets not assessed	0	0

Source: Assessed according to Baillie Gifford's internal assessment framework.

Assessment of holdings' transition role through the 'Climate Audit' process

These metrics provide insight into Baillie Gifford's own assessment of holdings' role in a successful transition to net zero. The metric is based on their 'Climate Audit' assessment, which is explained in more detail in Baillie Gifford's entity level TCFD Climate Report.		2023
		Portfolio
% of total AUM assessed as 'solutions innovators' (ie holdings whose core business involves developing solutions to climate change)	0	5
% of total AUM assessed as 'potential influencers' (ie holdings with relatively low emissions who are supporting the transition to net zero)	76	62
% of total AUM assessed as 'potential evolvers' (ie holdings with relatively high emissions who have potential to support the transition to net zero)	24	33
% of total AUM assessed as 'materially challenged' (ie holdings whose core business is likely to decline in a transition to net zero, with limited options to evolve)	0	0
% of total AUM not assessed	0	0

Source: Assessed according to Baillie Gifford's internal assessment framework.

¹ Includes oil and/or gas extraction and production, distribution, retail, equipment and services, petrochemicals, pipelines and transportation and refining. Excludes biofuel production and sales, and trading activities.

² Includes the mining of thermal coal (including lignite, bituminous, anthracite and steam coal) and its sale to external parties. Excludes metallurgical coal, coal mined for internal power generation, intra-company sales of mined thermal coal and revenue from coal trading.

³ In some cases, portfolios with higher proportions of unlisted or smaller companies may contain more holdings assessed as 'lagging'. This may be due to the relative immaturity of these companies' disclosure and net zero alignment strategies, when compared to larger and more established companies.

Science-Based Targets alignment among holdings

process of setting targets or awaiting their validation)

These metrics provide a view of portfolio holdings' net zero alignment targets, in addition to Baillie Gifford's own assessment in the tables above. The SBTi (Science Based Targets initiative) is the world's foremost certification body for corporate net zero targets. Companies with 'approved' targets are those whose net zero targets have been validated by the SBTi. Companies who have 'committed' are those who have submitted a commitment letter to SBTi and are in the process of setting targets or awaiting their validation.

% of total AUM invested in companies with targets approved by Science-

% of total AUM invested in companies who have committed to set targets approved by the Science-Based Targets initiative (ie those who are in the

<i>)</i> _	2022		20)23
	Portfolio	Benchmark	Portfolio	Benchmark
	22	43	30	46
	16	16	16	8

Source: SBTi

Based Targets initiative

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Baillie Gifford uses a combination of internal research and analysis and third-party data sources when preparing ESG-related disclosures.

Prior to using data sourced from a third-party provider, Baillie Gifford conducts appropriate due diligence on the third-party provider including validation of their methodology and assessment of their coverage and then carries out spot checks of the data periodically, escalating issues to the third-party provider where necessary.

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The figures in this report are aggregations and calculations which draw upon data from external data providers, principally MSCI.

MSCI ESG Research

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