

*Updated March 2022*

As part of Pzena Investment Management's statement of self-evaluation and adherence to Japan's Stewardship code, we regularly review our commitments as reflected in our statement of adherence. During the period of July 2021 – March 2022, the following actions were implemented:

- All stewardship-related policies and procedures are reviewed at least once annually. We recently documented our approach to climate change stewardship in the following document [Managing Climate Risk as a Value Manager](#).
- We maintain a relationship with the management teams of all Japanese companies through regular meetings, in-person site visits, and telephone calls. Our approach to these engagements is consistent across all our holdings i.e. collaborative and tailored to the specific issues for a given company.
- In the reporting period, engagements were conducted with approximately 30 Japanese management teams about various topics including: board structure and composition; capital allocation; and capex plans for environment-related projects and pathways to net zero.
- As part of our focus on ESG improvement through engagement, we have developed an 'ESG Opportunity List'. This is a portfolio-specific list, determined by the research team, of companies that are considered 'laggards' and/or face particularly controversial material ESG issues. Currently, there are 9 Japanese names on the list. Like all other names, they require a formal engagement plan and set of milestones, both of which are monitored and updated over time.
- We have made various enhancements to the way in which we aggregate and track stewardship-related information. We have a new research management system for documenting and storing stewardship updates for our holdings. We continue to publicly disclose our votes for Japanese securities and have enhanced our internal tracking of voting rationales. We have voted at 119 meetings of Japanese portfolio companies on behalf of Pzena funds and client accounts. The link to our Proxy Voting Dashboard can be found [here](#).
- We added an ESG Associate to the team to focus on current and future ESG reporting requirements.



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