

St Andrew's Healthcare Pension Scheme

Engagement Policy Implementation Statement

31 March 2024

1. Introduction

Under the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019, the Trustee is required to produce an annual Engagement Policy Implementation Statement (“EPIS”). This statement outlines how, and the extent to which, the policies relating to stewardship, voting and engagement as outlined in the Statement of Investment Principles (“SIP”) have been followed.

This statement covers the Scheme’s accounting year to 31 March 2024. It is intended to meet the updated regulations and will be included in the Scheme’s Report & Accounts. In preparing this statement, the Trustee has taken advice from their professional advisers.

This statement details some of the activities taken by the Trustee, the Manager and the investment managers during the period, including voting statistics, and provides the Trustee’s opinion on the stewardship activities over the period.

2. Policies

The Trustee’s relevant policies regarding stewardship, voting and engagement are outlined in the SIP. The most recent version of the SIP is publicly available being published online and will be updated from time-to-time. The SIP can be found online <https://www.stah.org/assets/Uploads/St-Andrews-Healthcare-Pension-Scheme-Statement-of-Investment-Principles-March-2023.pdf>.

The Trustee has appointed BlackRock as the adviser and Fiduciary Manager (“the Manager”) for the Scheme. The Trustee delegates the day-to-day investment decisions and asset allocation to the Manager. The Trustee retains responsibility for the strategic investment objective and oversight of the Manager, with support from Isio as the Trustee’s strategic oversight advisor (“the Oversight Advisor”).

During the year to 31 March 2024, the Trustee did not update the SIP. As such, the policies contained in the March 2023 SIP are those which are relevant to this Statement, which can be found online <https://www.stah.org/assets/Uploads/St-Andrews-Healthcare-Pension-Scheme-Statement-of-Investment-Principles-March-2023.pdf>.

The Trustee notes the “Guidance issued by the DWP relating to Reporting on Stewardship and Other Topics through the Statement of Investment Principles and the Implementation Statement” in July 2022. The Trustee plans to develop its policies and build more elements of this guidance into future iterations of this statement.

3. Scope of this statement

The Trustee acknowledges that the extent to which the policies in relation to stewardship, voting and engagement can be applied varies across the portfolio. For example, in general, voting rights are not attached to fixed income securities, while the applicability to the LDI (liability-driven investment) portfolio is limited. Nonetheless, the Trustee and the Manager expect all investment managers to take an active role in the stewardship of investments where relevant.

This statement demonstrates that the Scheme has adhered to its investment principles and its policies for managing financially material consideration including ESG factors and climate change.

4. Scheme activity

The SIP includes the Trustee’s policy on Environmental, Social and Governance (“ESG”) factors and stewardship. This policy sets out the Trustee’s beliefs on ESG and the processes followed by the Trustee in relation to voting rights and stewardship.

The Trustee recognises that the Manager is engaging with the underlying managers to ensure they work to further improve their ESG policies and actions over time. As part of the Trustee’s ESG policy, the Manager is required to request the underlying managers’ policies and their adherence to them. The Manager reviews the policies of each underlying manager to ensure that these are appropriate.

The Trustee expects the Manager to continue to work with underlying managers in order to ensure those on the weaker side of voting and engagement take action to make improvements. The Manager has acknowledged that all managers have been taking steps to improve both their voting and engagement and “best in class” continues to evolve. The Trustee will be closely monitoring developments over the coming years.

The Trustee receives additional support and advice from their Oversight Advisor in matters related to ESG, including monitoring of the Manager’s approach to implementing the policies within the SIP and approach to engagement.

5. Voting and Engagement

The Trustee has delegated to the Manager the responsibility of collecting the stewardship and engagement reports of the underlying managers and assessing the suitability. The Trustee also expects the Manager to monitor the underlying manager’s activity to ensure compliance and confirm that it remains a suitable investment for the Scheme. The Trustee is comfortable that under the governance structure the responsibility sits with the Manager to communicate with the underlying managers and on a regular basis collect information as required.

The Manager has noted that there is variability between managers in the extent of their engagement and voting policies, with equity managers generally having made more progress than fixed income. This Implementation Statement focuses on the Scheme’s equities managers. It is intended that in future years there will be greater focus on other asset classes, in particular the fixed income managers.

The section below details the investment managers’ approach to voting and engagement as well as some examples of most significant engagements these managers have made over the 12 months in respect to the funds in which the Scheme is invested.

At this stage the Trustee has not identified stewardship priorities or themes and has elected for the investment managers, including the Manager, to exercise votes in line with their stewardship policies. The Trustee is content that these policies are aligned with the Trustee’s policy. In line with this decision, the Trustee has not provided an expression of wish on how it would like investment managers to invest on any individual vote.

What constitutes a most significant vote is somewhat subjective and is determined in conjunction with the investment managers. The criteria which are likely to be considered when determining a most significant vote include the size of the allocation, the potential impact of the vote (including the potential to substantially impact financial or stewardship outcomes), the nature of the vote and engagement with the company (a vote where the investment manager has engaged more with a company on an issue is more likely to be considered significant) and whether this aligns to a theme, such as corporate governance or climate change. The Trustee has not communicated to managers what it considers to be the most significant votes in advance of those votes being taken. In addition, summary voting statistics in respect of the Scheme’s equities funds over the year to 31 March 2024 have been included. Voting statistics have been reported over the one-year period to 31 March as this likely to result in greater coverage across investment managers and therefore also provide greater comparability and consistency going forwards.

BlackRock:

The Scheme has a portion of its Growth assets invested in funds managed by the Manager. Given the Manager’s appointment as both the fiduciary manager as well one of the investment managers, the Trustee recognises the importance of ensuring that the Manager’s own policies and actions are appropriate for the Scheme. The Manager publicises its own policies as well as quarterly updates online (which can be accessed [here](#)) which the Trustee has visibility of. This includes details of any changes to policies and also reports at an aggregate level the impact of its voting and engagement. The Trustee is comfortable that the transparency of the Manager in publicising reports and developments online ensures alignment with the interests of the Scheme.

Whilst it is important to monitor the activities of the Manager at a high level through this publicly available information, it is also important to monitor the voting and engagement activities undertaken on behalf of the Trustee by the Manager on a more granular level.

With the exception of the BlackRock European Equities fund, BlackRock Factor Equities and BlackRock Thematic Equities, the Scheme's BlackRock equities funds are passive (i.e. index) strategies. In respect of passive strategies, there is a wide universe of underlying companies which may number in the hundreds if not thousands. Where strategies are actively managed, investments are typically more concentrated. As such, ownership is more concentrated for actively managed strategies and therefore there will be fewer resolutions in which to vote. In addition, actively managed strategies have the option to sell holdings in companies at its discretion. For these reasons, in the context of passive strategies, it is important that voting and engagement rights are exercised and that this is monitored. Examples of significant votes across the BlackRock strategies are included below. The summary voting statistics below illustrate that the voting rights attached to the underlying investments in these instances have been exercised to a large extent.

The Manager's approach to voting is described in the table below, along with summary voting statistics for the Manager's equities funds.

Approach to voting

BlackRock sees its investment stewardship program, including proxy voting, as part of its fiduciary duty and as a way to enhance the value of clients' assets, using their voice as a shareholder on their behalf to ensure that companies are well led and well managed.

The BlackRock Investment Stewardship team does this through engagement with management teams and/or board members on material business issues including environmental, social, and governance matters and, for those clients who have given BlackRock authority, through voting proxies in the best long-term economic interests of its clients.

BlackRock's proxy voting process is led by the BlackRock Investment Stewardship team ("BIS"), which consists of three regional teams – Americas ("AMRS"), Asia-Pacific ("APAC"), and Europe, Middle East and Africa ("EMEA") - located in seven offices around the world. The analysts within each team will generally determine how to vote at the meetings of the companies they cover. Voting decisions are made by members of the BlackRock Investment Stewardship team with input from investment colleagues as required, in each case, in accordance with BlackRock's Global Principles and custom market-specific voting guidelines.

Whilst BlackRock subscribes to research from the proxy advisory firms Institutional Shareholder Services (ISS) and Glass Lewis, it is just one among many inputs into its vote analysis process, and it does not blindly follow their recommendations on how to vote. BlackRock does not follow any single proxy research firm's voting recommendations. It subscribes to two research providers and uses several other inputs in its voting and engagement analysis, including a company's own disclosures, public information and ESG research.

BlackRock uses Institutional Shareholder Services' (ISS) electronic platform to execute vote instructions, manage client accounts in relation to voting and facilitate client reporting on voting. In certain markets, BlackRock works with proxy research firms who apply their proxy voting guidelines to filter out routine or non-contentious proposals and refer to us any meetings where additional research and possibly engagement might be required to inform their voting decision.

YUM! Brands, Inc. (Yum!)
(US restaurant company)

Issue(s): Environmental, Governance

YUM! Brands, Inc. (Yum!) is a restaurant company that owns and operates the KFC, Pizza Hut, Taco Bell, and The Habit Burger Grill restaurant franchises.

At the May 2023 AGM there were five shareholder proposals. Ahead of the May 2023 AGM, BIS engaged with members of Yum!'s management team to help inform their voting and sought to further their understanding of the matters on which shareholders requested additional disclosure and assess the business relevance and financial implications of each proposal. BIS did not believe it was in the financial interests of their clients to support these shareholder proposals and as such BIS voted against all 5 of the shareholder proposals, which was in line with management's recommendation. Of the 5 shareholder proposals, 2 of these were withdrawn and the remaining 3 were not passed.

One shareholder proposal addressed the company's plans to reduce single-use plastic packaging. This shareholder proposal requested that Yum!'s board issue a report "...describing how the Company will reduce its plastics use by shifting away from single-use packaging..." in response to recent regulatory trends in certain jurisdictions which have levied taxes on and/or banned the use of single-use plastic products. The proposal further clarified that such a report should explicitly "evaluate dramatically reducing the amount of plastic" used in the company's packaging.

BIS did not support this proposal, which requested Yum! to issue a report detailing the company's efforts to reduce plastics use. In their analysis, Yum!'s existing disclosures on plastics use – particularly their new packaging policy and reduction goals – are comprehensive and provide sufficient information to allow investors to understand the company's approach to managing the risks of plastics use.

In July 2022, Yum! updated their sustainable packaging policy, outlining the actions they have taken and those that they plan to take to address the issue of plastic-based packaging. Among other things, the company set goals to eliminate unnecessary plastics use, reduce virgin plastic content by 10%, and move consumer-facing plastic packaging to be reusable, recyclable, or compostable by 2025 across all brands. BIS notes that there are areas where, in their assessment, Yum! could improve their disclosure, particularly in setting targets for reusable packaging. However, Yum!'s existing disclosures and commitments are sufficiently comprehensive for investors to understand their approach. BIS did not consider it necessary for shareholders to direct management to undertake a review of Yum!'s sustainable packaging policy and targets less than a year after these were introduced as they believed it was not in the financial interest of their clients to support the shareholder proposal.

Issue(s): Environmental, Governance

ExxonMobil Corporation (Exxon) is a globally integrated energy company headquartered in the U.S.

At Exxon's May 2023 annual general meeting (AGM), BIS supported the election of Exxon's directors and all management proposals. BIS did not support any shareholder proposals. Based on their assessment, the financial cost to the company to respond to the proposals outweighed any incremental informational benefit to investors. On balance, the proposals were overly prescriptive in nature, unduly constraining on management, or addressed business risks that the company's existing practices and disclosures adequately cover.

One of the proposals was for the company to adopt a medium-term scope 3 GHG reduction target. BIS did not support this shareholder proposal because, in their view, the methodology for setting scope 3 targets in carbon intensive industries is still under development. Until there is a common framework for managing the related uncertainty and complexity, BIS can look to company management to determine the appropriate disclosures to help investors understand their approach. Further, complying with the specific ask of the shareholder proposal may be unduly constraining on management and the board's ability to set the company's long-term business strategy.

**ExxonMobil
Corporation
(Exxon)**
(Global energy
company)

In January 2022, Exxon announced updated scope 1 and 2 GHG emissions reduction targets through 2030 relative to 2016 levels, including a 20-30% reduction in corporate-wide GHG intensity by 2030, a 40-50% reduction in upstream GHG intensity by 2030, and a 70-80% reduction in corporate-wide methane intensity by 2030. Exxon also plans to achieve net-zero emissions in the Permian basin by 2030 and has a broader target to achieve net-zero scope 1 and 2 GHG emissions by 2050.

Exxon has continued to enhance their disclosure and action around managing climate-related risks and opportunities. In December 2022, the company released a 2023 Advancing Climate Solutions Report which outlines their approach to "strengthening energy supply security and reducing emissions to support a net-zero future while growing value for our shareholders and stakeholders." In it, the company highlights several of their achievements and initiatives such as a target to increase the amount invested in lower-emission initiatives by 15% to approximately \$17 billion through 2027. From 2021, Exxon has grown their Low Carbon Solutions business by focusing on opportunities such as carbon capture and storage (CCS), hydrogen and biofuels. This has included signing a significant commercial CCS agreement in October 2022.

Based on these efforts and BIS' engagements with the company, BIS believes that Exxon's management and board have demonstrated a more defined commitment to capturing opportunities relating to a transition to a low carbon economy, as well as minimizing attendant risks. Therefore, BIS did not believe it was in the financial interests of their clients to support this shareholder proposal.

Issue(s): Governance

Besi is a Dutch multinational company that designs and manufacturers semiconductor equipment. BIS has regularly engaged with Besi due to poor remuneration practices.

At Besi's 2020, 2021, and 2022 annual general meetings (AGMs), BIS did not support the company's remuneration policy or remuneration report. This is because in BIS' assessment, the remuneration practices led to excessive payouts.

BE
Semiconductor
Industries N.V
(Besi)
(Dutch
manufacturer)

At Besi's 2023 AGM, BIS did not support the 2022 remuneration report given they continue to observe areas for improvement. For example, the metrics introduced were not challenging – the long-term incentive plan still vests for underperformance against peers on a total shareholder return basis. BIS also noted that the company used the same metrics in both the short- and long-term incentive plans, resulting in the rewarding of executives for the same performance twice.

However, contrary to the past years, at the 2023 AGM, BIS voted in favour of the 2024 remuneration policy. BIS note that Besi eliminated the ability of the remuneration committee to use discretion, introduced more stretching performance conditions, and limited the award potential to a percentage base salary to reduce the likelihood of excessive payouts. Furthermore, the company introduced share ownership guidelines for executives to reinforce their alignment with shareholders' interests and established a more robust peer company selection process. Overall, BIS are highly encouraged by the company's responsiveness to shareholder feedback and supported the 2024 remuneration policy proposal.

BlackRock US		Year to 31 March 2024
Equities (Index)	Votable proposals	7,467
	% of resolutions voted	100%
	% of resolutions voted against management	2%
	% of resolutions abstained	0%
BlackRock UK		Year to 31 March 2024
Equities (Index)	Votable proposals	14,770
	% of resolutions voted	96%
	% of resolutions voted against management	3%
	% of resolutions abstained	1%
BlackRock Asia		Year to 31 March 2024
Pacific Equities (Index)	Votable proposals	3,119
	% of resolutions voted	100%
	% of resolutions voted against management	10%
	% of resolutions abstained	0%
BlackRock		Year to 31 March 2024
Japan Equities (Index)	Votable proposals	6,075
	% of resolutions voted	100%
	% of resolutions voted against management	4%
	% of resolutions abstained	0%

iShares S&P 500 ETF		Year to 31 March 2024
	Votable proposals	7,217
	% of resolutions voted	100%
	% of resolutions voted against management	1%
	% of resolutions abstained	0%
iShares Edge MSCI USA Value Factor ETF		Year to 31 March 2024
	Votable proposals	2,078
	% of resolutions voted	100%
	% of resolutions voted against management	1%
	% of resolutions abstained	0%
iShares MSCI EMU ETF (Index) (Bought in December 2023)		Year to 31 March 2024
	Votable proposals	3,903
	% of resolutions voted	99%
	% of resolutions voted against management	9%
	% of resolutions abstained	1%
BlackRock Europe Equities (Active)		Year to 31 March 2024
	Votable proposals	843
	% of resolutions voted	82%
	% of resolutions voted against management	6%
	% of resolutions abstained	1%
BlackRock Thematic Equities (Active)		Year to 31 March 2024
	Votable proposals	22,012
	% of resolutions voted	96%
	% of resolutions voted against management	7%
	% of resolutions abstained	2%
BlackRock Factor Equities (Active)		Year to 31 March 2024
	Votable proposals	2,935
	% of resolutions voted	94%
	% of resolutions voted against management	2%
	% of resolutions abstained	0%

Other investment managers

The approach to voting and engagement of the Scheme's other equities managers, Schroders, Wellington, American Century, are detailed below. JP Morgan is also included; however, JPM China Equities was sold in October 2023. These managers are appointed in relation to the Scheme's equity holdings.

Schroders:

Approach

The overriding principle governing Schroders' approach to voting is to act in the best interests of its clients. Schroders' voting policy and guidelines are outlined in its publicly available Environmental, Social and Governance Policy. Schroders evaluates voting issues arising and, where it has the authority to do so, votes on them in line with its fiduciary responsibilities in what it deems to be the interests of its clients. In applying the policy, Schroders considers a range of factors, including the circumstances of each company, performance, governance, strategy and personnel.

It is Schroders' policy to vote all shares at all meetings globally, except where there are onerous restrictions – for example, shareblocking. Schroders utilises the services of ISS and the Investment Association's Institutional Voting Information Services ('IVIS') in conjunction with its own research and policies when formulating voting decisions. With regards to abstaining from votes, Schroders' preference is to support or oppose management and only use an abstention sparingly. Schroders may abstain where mitigating circumstances apply, for example where a company has taken some steps to address shareholder issues.

For certain holdings of less than 0.5% of share capital in the USA, Australia, New Zealand, Japan, and Hong Kong, Schroders has implemented a custom policy that reflects the views of its ESG policy and is administered by Schroders' proxy voting provider, ISS. Schroders votes on both shareholder and management resolutions.

Further details on Schroders' approach to voting can be found [here](#).

Issue(s): Environmental, Social, Governance

Terna Energy is a Greek renewable energy company that plays a leading role in clean energy production while carrying out innovative projects for the environment, which contribute to sustainable development.

Throughout 2023, the Schroders investment team engaged with Terna Energy on the follow issues:

- Supply chain management – how much ESG focus is given to their suppliers?
- Biodiversity management – how does Terna ensure that environmental risks and depletion are managed across operations?

Terna Energy
(Greek renewable energy company)

In terms of the supply chain management, Terna adopted a procurement policy in 2022 and suppliers/partners are selected in line with these policy provisions. Terna have been applying the Code of Ethics, GDPR, human rights and purchasing policies to suppliers and as such, suppliers must provide policy statements regarding forced labour and evidence of control and monitoring facilities. Terna has the right to conduct inspections on suppliers and can terminate contracts should a supplier fail to abide by their principles and values.

On biodiversity management, Terna is in full compliance with legislation and environmental requirements, whilst climate risks are formulated into the company's strategy. The following impact management initiatives are applied: investigation of project areas and whether they are governed by specific regulatory restrictions (including protected areas); preparation of environmental impact studies and implementation of an environmental management system; and installations of bird protection systems, approved by the

environmental terms. For every project that is completed within forest areas, reforestation is performed equal to the project size.

		Year to 31 March 2024
Schroders EM Equities	Votable proposals	2,085
	% of resolutions voted	95%
	% of resolutions voted against management	8%
	% of resolutions abstained	5%

Wellington:

Approach

Wellington votes according to its Global Proxy Voting Guidelines and employs a third-party vendor, Glass Lewis, to perform administrative tasks related to proxy voting. Wellington does not automatically vote proxies either with management or in accordance with the recommendations of third-party proxy providers, ISS and Glass Lewis. Wellington has its own ESG Research Team, which provides voting recommendations. Based on these resources and in conjunction with Wellington's Global Proxy Voting Guidelines, individual portfolio managers have authority to make final decisions on voting. There is no "house vote". Wellington's proxy voting system allows different votes to be submitted for the same security. Various portfolio managers holding the same securities may arrive at different voting conclusions for their clients' proxies.

Wellington's policies can be found [here](#).

Issue(s): Social, Governance

China Resources Gas Group Ltd
(Chinese utility group)

China Resources Gas Group Ltd is a leading utilities group in China. The company engages in downstream city gas distribution including piped natural gas distribution and natural gas fillings stations operations. In May 2023, there was a vote at the annual general meeting to re-elect the independent non-executive director, Mr WONG Tak Shing. Wellington voted against this proposal because of concerns of board independence and gender diversity concerns.

In addition, there was a vote to allow the company to issue shares without pre-emptive rights. An issue of shares with pre-emptive rights ensures that existing shareholders can purchase shares before they are offered to third parties. Meaning that existing shareholders could maintain their proportion of ownership in the company, despite there being a new issuance of shares. An issuance without pre-emptive rights removes this opportunity for existing shareholders. The company was offering a discount price for the issuance that Wellington believed exceeded the reasonable limits. Wellington voted against the proposal as the vote for would have been against the best interests of the shareholders.

		Year to 31 March 2024
Wellington Small Cap Equities	Votable proposals	1,415
	% of resolutions voted	97%
	% of resolutions voted against management	6%
	% of resolutions abstained	0%

American Century:

Approach

American Century's (ACI) Guiding ESG Principle are outlined in its ESG Policy and are as follows:

ACI's primary mission is to deliver superior, long-term, risk-adjusted returns for clients. ACI focuses on material ESG issues, which are financially material. ACI seeks to integrate the analysis of potential risks and opportunities associated with ESG issues into its fundamental research process. ACI's goal is to mitigate downside risks and capture upside potential without compromising its fiduciary duty to act in the best interest of clients.

ACI states that *"in addition to conducting business with the highest ethical standards and complying with all applicable laws and regulations, our ESG approach is regularly reviewed against industry investment stewardship and governance standards and other ESG methodologies to ensure alignment with our processes."*

American Century subscribes to the proxy voting services of Institutional Shareholder Services ("ISS"), including their proxy voting platform, voting advisory services, and vote disclosure services. While American Century reviews and considers ISS's research, analysis, and recommendations, it votes proxy using the ISS voting platform in accordance with the ACI's proxy voting policies, which can differ from those of ISS.

Further information on American Century's voting policies can be found [here](#).

Issue(s): Governance

e.l.f. Beauty, Inc
(American cosmetics brand)

e.l.f is an American cosmetics brand that operates worldwide. In August 2023, a vote was proposed to ratify the names Executive Officers' compensation. American Century voted against this proposal. The reason being because the company has not disclosed any short- and long- term Environmental and Social performance incentives and the company maintains an auto-accelerated equity vesting change-in-control provision. The vote was passed, however American Century will continue to monitor the company's disclosures and equity provisions.

	Year to 31 March 2024	
American Century Small Cap Equities	Votable proposals	1,616
	% of resolutions voted	99%
	% of resolutions voted against management	10%
	% of resolutions abstained	0%

J P Morgan

JP Morgan has an explicitly stated investment stewardship philosophy, believing that the companies they engage with will produce better long-term financial results, while simultaneously contributing to an improved society. JP Morgan's stewardship activities are based on proprietary environmental, social and governance research, driven by both their broad investment teams in addition to a dedicated Sustainable Investing team.

JP Morgan subscribes to research from the proxy advisory firms Institutional Shareholder Services (ISS), GES International (Sustainalytics) and Glass Lewis.

Approach

JP Morgan's Sustainable Investing Oversight Committee is made up of chief investment officers and leaders from its sustainable investing and control functions, and serves as a single point of strategic oversight, decision-making, review and assurance. The business employs regional heads of stewardship to work with local teams, while the Global Head of Sustainable Investing, Jennifer Wu, oversees the global stewardship effort. With regards to engagement, JP Morgan conducts approximately 500 dedicated ESG engagement meetings per year.

Further details on JP Morgan's voting policies can be found [here](#).

**China
Merchants
Bank Co., Ltd**
(Chinese Bank)

Issue(s): Governance

China Merchants Bank operates as a commercial bank in China. JP Morgan believe that a strong independent element to a board is essential to the effective running of a company and they expect that majority of the board should be comprised of independent directors with clear steps being taken to improve board independence over time. At the same time, non-executive directors should have sufficient time to meet their board responsibilities. In order to be able to devote sufficient time to his or her duties, JP Morgan would not normally expect a non-executive to hold more than three significant directorships at any one time.

In June 2023, there was a vote to elect a director. The director candidate is a newly proposed non-independent non-executive director who serves five public boards currently, and the company's board independence is at 38%, below JP Morgan's expectation of at least majority independence. As such, JP Morgan voted against his election.

		Year to 31 March 2024
JPM China Equities <i>(Sold in October 2023)</i>	Votable proposals	567
	% of resolutions voted	100%
	% of resolutions voted against management	11%
	% of resolutions abstained	0%

6. Concluding remarks

The Trustee is comfortable that the policies in the SIP have been followed over the year to 31 March 2024.

The Trustee recognises the responsibility that institutional investors have or promote high standards of investment stewardship and will continue to use the influence associated with the Scheme's assets in order to positively influence the Scheme's investment managers.