

The Atos UK 2019 Pension Scheme - SIP Implementation Statement

Introduction

This SIP Implementation Statement ("the Statement") has been prepared by Atos Pension Schemes Limited ("the Trustee") in relation to the Atos UK 2019 Pension Scheme ("the Scheme"). The Statement is required by the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 (as amended). The regulations state that the Statement must (amongst other matters):

- set out how, and the extent to which, in the opinion of the Trustee, the statement of investment principles ("SIP") has been followed during the year;
- describe any review of, and explain any changes made to, the SIP during the year; and
- describe the voting behaviour by, or on behalf of, the Trustee (including the most significant votes cast by the Trustee or on their behalf) during the year and state any use of the services of a proxy voter during that year.

Based on regulatory requirements, the Statement will cover the period from 1st January 2022 to the end of the Scheme's financial year on 31st December 2022. There were separate sections within the SIP for both the DB and DC elements of the Scheme. The Statement is therefore split accordingly, to reflect the differing content and relevance to different members.

The Statement is split into three sections:

1. an overview of the Trustee's actions and highlights during the period covered;
2. the policies set out in the SIP for both the DB and DC sections and the extent to which they have been followed in the reporting period; and
3. the voting behaviour and significant votes undertaken by the fund managers on behalf of the Scheme.

From 1 October 2022, further Department of Work and Pensions ('DWP') guidance on the reporting of stewardship activities through Implementation Statements came into effect. This statement aims to consider this guidance as the Trustee moves towards meeting the DWP's updated stewardship expectations.

SIP Updates

There were no amendments made to the SIP during the reporting period. The SIP was last updated in June 2021.

Overview of Trustee's Actions - DB

Investment Objectives and Strategy

During the reporting period, there were no changes to the Scheme's investment objectives.

The Trustee has made informed strategic investment decisions in accordance with its rights and responsibilities to enable the achievement of the Trustee's long-term investment objectives as set out in the SIP.

The Scheme's investment strategy was not materially amended over the year, however there were some notable developments.

- In May 2022, a full redemption from the Mercer Multi-Asset Credit (MAC) Fund was instructed, based on its fund-of-funds structure leading to relatively higher fees and lower liquidity compared to alternatives. The liquidity point was made more important by the environment of rising interest rates, which was increasing the likelihood of needing cash at short notice to meet capital calls to top up collateral in the Schroders LDI portfolio.
- In light of rising interest rates over 2022, including unprecedented volatility in gilt markets experienced in September and October, actions were taken to sell return-seeking assets to reinvest in the LDI portfolio. This was done to reduce leverage, thus increasing the magnitude of interest rate stress that could be withstood without exhausting the collateral backing the LDI strategy.

Overall, the Scheme's agreed strategic asset allocation reflects the Trustee's view of the most appropriate investments, balancing risk/reward characteristics of the funds the Scheme is invested in, to support the Scheme's full funding objective.

Trustee's policies for investment managers

The Trustee relies on investment managers for the day-to-day management of the Scheme's assets, but retains control over the Scheme's investment strategy.

The Investment Managers are responsible for the day-to-day management of the Scheme's assets in accordance with guidelines agreed with the Trustee, as set out in the Investment Management Agreements ("IMAs") or pooled fund prospectuses. The Investment Managers have discretion to buy, sell or retain individual securities in accordance with these guidelines. The Investment Managers report to the IFC regularly regarding their performance, which in turn reports back to the Trustee. Each of the Investment Managers' fees are related to the amount of assets managed within their portfolios. Minimum fees may also apply in some cases.

Each of the Scheme's managers have also received a copy of the Responsible Investment Belief Statement and have been asked to adhere to this where possible. The Investment Managers are being monitored against the carbon net-zero objective.

Final Remarks

As demonstrated in the following sections of this Statement, the actions the Trustee has undertaken during the relevant reporting period reflect the policies within the Scheme's SIP. Any changes to the investment strategy agreed during the period but implemented after the period had ended will be reported against in the next implementation statement.

The responsibility for managing the Scheme's holdings is delegated to its Investment Managers. The Trustee believes that the Scheme's Investment Managers are well placed to engage with invested companies on environmental, social and governance ("ESG") matters, given their knowledge of the company and the level of access they have to company management. This is also a pragmatic approach because of the number of stocks owned by the Scheme, and the amount of time corporate entities have available for single investors. However, the Scheme sets out its expectations to its asset managers in terms of Corporate Governance via the 'Responsible Investment and Corporate Governance' and 'Stewardship Policy' sections within the SIP.

The Trustee believes that it should act as a responsible steward of the assets in which the Scheme invests as this can improve the longer-term returns of its investments. The Trustee notes that sustainable financial outcomes are better leveraged when supported by good governing practices, such as board accountability.

It is the Trustee’s belief that the policies set out in the SIP regarding the exercise of rights attaching to investments and the undertaking of engagement activities in respect of the investments has been followed over 2022.

Over 2023, the Trustee plans to consider how best to meet the DWP’s new expectations on stewardship and move to take more ownership of stewardship, as the new guidance expects. Changes to the Trustee’s approach will be taken with regard to the Scheme’s governance constraints and in the best interest of the Scheme’s members..

Overview of Trustee’s Actions - DC

Investment Arrangements

The Trustee has reviewed the design of the DC investment strategy and performance of each fund against its stated performance objective and in the context of a potential transfer of the DC arrangements to the Aegon Master Trust. Prior to the transfer, the Trustee continues to monitor all managers on a regular basis, considering both the performance of the funds and other prevailing circumstances.

Review of DB SIP Policies

Policy	Has the policy been followed?	Evidence
Investment Objectives		
<p>The Trustee has worked collaboratively with the Principal Employer to adopt a Pension Risk Management Framework (“PRMF”) to guide the strategic asset allocation (“SAA”) and risk management strategy of the Scheme.</p> <p>The PRMF sets out the key investment objectives of the Scheme, the metrics used to measure these objectives and the constraints within which the objectives will be targeted.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>The PRMF is reviewed on a quarterly basis by the Trustee, with clear written advice provided by the Investment Consultant if any of the metrics used to measure the objectives fall outside the pre-agreed constraints.</p>

Policy	Has the policy been followed?	Evidence
Risk		
<p>The risks, as per stated in the SIP are assessed and monitored regularly.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>The SIP lists a number of risk factors that the Trustee believes may result in a failure to meet the agreed objectives. The Trustee monitors and manages these risk factors through measures specific to each risk on a quarterly basis. It seeks guidance and written advice from its Investment Consultant as appropriate.</p>

Policy	Has the policy been followed?	Evidence
Expected Return		
<p>The Trustee recognises that, depending on the prevailing level of funding, the Scheme requires a strategy to be implemented which is intended to produce a return consistent with that assumed in the actuarial valuation for funding purposes.</p> <p>There is also a dual objective of ensuring an expected return that allows the Scheme to meet its primary investment objective of being 100% fully funded by 2034 on a Gilts+0.5% basis.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>The required return for full funding by 2034 on the Gilts+0.5% basis is monitored within the PRMF. The expected return of the Scheme was consistently in line with or exceeding the required return over the first three quarters of the year, however market movements over September and October 2022 and the consequential need to sell return-seeking assets to increase collateral levels within the LDI portfolio led to the expected return being behind the required return over Q4 2022.</p> <p>The Trustee's Investment Consultant provided formal written advice on steps to increase the expected return in Q4 2022, which included reinvesting some excess LDI collateral into liquid credit. Given that the funding objective (and therefore required return) is subject to change as part of the ongoing 31 December 2022 actuarial valuation, which will be impacted by the ongoing Company transformation plans, the decision has been taken to limit the extent to which further actions are taken to bring the expected return in line with the required return until these actions are progressed.</p>

Policy	Has the policy been followed?	Evidence
Investment Policy		
<p>An investment policy has been established for the Scheme's DB assets to ensure that the portfolio meets the agreed risk and return objectives.</p> <p>This includes a benchmark Strategic Asset Allocation for the Scheme which operates within tolerance ranges, as to ensure that the risk of deviating from the strategic allocations is balanced against the cost of rebalancing.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>The Scheme has adhered to the investment policy set out in the SIP. Although the asset allocation has diverged to an extent from the strategic asset allocation set out in the SIP, the Trustee is comfortable that the Scheme has operated broadly within tolerance ranges, apart from where extreme market volatility has driven larger divergence.</p> <p>The investment policy, including the strategic asset allocation, will be reviewed and updated once the investment strategy has been fully reviewed in light of the ongoing 31 December 2022 actuarial valuation.</p> <p>The Investment Consultant reviews the relative asset weightings against their benchmark weighting on a quarterly basis. This is to help provide the Trustee with written advice on which mandates should be invested / divested from when considering how to meet the Scheme's required cashflow needs.</p>

Policy	Has the policy been followed?	Evidence
Investment Manager Policy		
<p>The Scheme holds investments in both segregated and pooled arrangements. For the segregated arrangements, the long-term relationships between the Trustee and its managers are set out in separate Investment Manager Agreements (“IMAs”). These document the Trustee’s expectations of their managers, alongside the investment guidelines they are required to operate under.</p> <p>For pooled arrangements, the Scheme’s investments are managed according to standardised fund terms, which are reviewed by the Scheme’s legal and investment advisors at the point of investment to ensure that they are aligned with the Scheme’s long-term investment strategy and market best practice.</p> <p>The Trustee shares both its SIP and Responsible Investment Belief Statement with the managers periodically, with the aim of ensuring managers invest in line with the Trustee’s policies.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>Meetings have been held between the Trustee and manager for the Scheme’s non-hedging asset segregated mandates to explore how the investments could better match the Scheme’s expectations of their managers. This has also been done at the point of investment.</p> <p>Examples of the tailoring of the IMAs include:</p> <ul style="list-style-type: none"> • Specific decarbonisation targets • Exclude investments associated with tobacco producers • Commitment to incorporate relevant ESG factors into decision making and provide ESG reporting <p>The pooled-fund investments with both Stonepeak and Mirova (Renewables) were only approved following approval from both the Investment Consultant and the Scheme lawyers on the standardised fund terms.</p> <p>The Responsible Investment statement has been circulated with each of the Scheme’s new and existing managers over the course of the Scheme year.</p>

Policy	Has the policy been followed?	Evidence
Day-to-day management of the assets		
<p>The Trustee employs Investment Managers, with whom day-to-day responsibility for the investment of the Scheme’s assets rest.</p> <p>Details of the mandates set for the Investment Managers by the Trustee are set out in the DB Investment Policy Implementation Document (“IPID”).</p> <p>Where assets are managed on a segregated basis, the Trustee is able to tailor the nature of the investment mandate and restrictions on how assets are managed to meet the Scheme’s specific requirements.</p> <p>The Trustee accepts that it is not possible to specify investment restrictions where assets are managed via pooled funds as the Investment Manager has discretion over the timing and realisation of investments.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>The Trustee has met with the Scheme’s segregated managers who manage non-hedging assets to determine how the IMA can be tailored to better meet the Scheme’s specific requirements.</p> <p>The Scheme’s Investment Consultant has consulted each of the Scheme’s managers on the expectations of the Trustee for the day-to-day management of assets. Despite the inability to specify investment restrictions for assets managed via pooled funds, the Investment Consultant has provided each manager with a copy of the Responsible Investment Belief Statement and confirmed that a significant divergence from this would result in the Scheme disinvesting where possible.</p>
Additional Voluntary Contribution Assets (“AVCs”)		
<p>With the assistance of the Scheme’s consultants, the AVC arrangements will be reviewed periodically to ensure that the investment profile of the funds available remains consistent with the objectives of the Trustee and the needs of the members.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>The Trustee has not made any changes to the AVC fund or manager arrangements during the period covered by this document.</p>

Review of DC SIP Policies

Policy	Has the policy been followed?	Evidence
Investment Policy		
<p>The Trustee regards its prime DC duty as providing a default investment strategy to meet the requirements of members who do not or are unable to make an investment decision. In addition its duty is also to make available a range of investment options sufficient to enable members to tailor their investment strategy to their own needs, recognising these may change during the course of the members’ working lives.</p> <p>Members are able to choose the balance between the different kinds of investments. The balance will determine the expected return on member’s assets and should be related to the member’s own risk appetite and tolerances.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>An annuity focused lifestyle option was selected as the default investment at the last review, based on an analysis of the membership, including its risk tolerance, members’ projected account values and wider industry experience.</p> <p>In line with the Trustee’s objective to provide a range of investment options, the Trustee also makes available a range of self-select funds, which include ethical and shariah options.</p> <p>Members who prefer to make their own investment choices can therefore choose from a range of individual funds, which have been selected by the Trustee after taking professional investment advice.</p>

Policy	Has the policy been followed?	Evidence
Lifestyle Strategy and Default Investment Option		
<p>Lifestyle strategies are designed to meet the conflicting objectives of maximising the value of the member’s assets at retirement and protecting the member’s accumulated assets in the years approaching retirement.</p> <p>The Trustee will periodically review the investment arrangements to ensure the fund range remains suitable.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>Changes to the investment strategy have been deferred, pending the potential further transfer of ex-SEMA section members out of the Scheme to the Aegon Master Trust. This proposed transfer is expected during 2023.</p>
Risk		
<p>The risks, as stated in the SIP are assessed and monitored regularly.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>Risk is not considered in isolation, but in conjunction with expected investment returns and outcomes for members.</p> <p>The default lifestyle strategy balances the trade-off between the different risks that DC members face and the expected returns, both through the de-risking strategy and the selection of investment funds, moving members into lower risk funds as they get closer to retirement. The Trustee also makes available a range of funds expected to manage the different risks, across various asset classes for members wishing to self-select their investments.</p>

Review of Policies applying to All Sections

Policy	Has the policy been followed?	Evidence
Responsible Investment and Corporate Governance		
<p>The Trustee has developed a Sustainable Investment Policy. The Trustee believes that Environmental (including Climate Change risks), Social and Governance issues are complex, multifaceted and may impact the value of the Scheme’s investments. The Trustee considers these risks to be of concern over the short, medium and long term.</p> <p>When selecting new investment managers, the Trustee must be comfortable that they can adequately manage ESG-related risks and invest in line with its beliefs. Managers should be periodically reviewed and held to account. If the Trustee is not satisfied that the Scheme’s managers are investing responsibly, it will engage with them to try to improve, but ultimately will terminate the mandate if improvements are not made.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>Over the Scheme year, Impact Cubed, an ESG portfolio analytics company, undertook line-by-line analysis of the buy and maintain corporate bond portfolios managed by Amundi and Insight to conduct an assessment of their sustainability profiles. Both managers then presented to the Trustee on their most recent engagement with the most out-sized negatively contributing companies within their portfolios in terms of emissions. As a result of these meetings, the managers were asked to increase engagement where possible.</p> <p>The DC Section of the Atos 2019 Scheme accesses funds through Aegon’s investment platform. The investments are a mixture of both actively and passively managed funds. The Trustee’s strategic review has identified that no specific ESG or climate change funds are currently included in the DC Section fund range. Consideration of ESG and climate change-related funds will continue as part of the potential move to the Aegon Master Trust. The Scheme’s current approach is as set out in the following paragraph.</p> <p>The Trustee has delegated to the investment managers full discretion in evaluating ESG factors, including climate change considerations, exercising voting rights and stewardship obligations.</p>

Policy	Has the policy been followed?	Evidence
Stewardship Policy		
<p>Direct engagement with underlying companies (as well as other relevant persons) in respect of shares and debt is carried out by the Scheme's Investment Managers.</p> <p>This includes monitoring and engaging with issuers of debt or equity on financially material issues concerning strategy, capital structure, management of actual or potential conflicts of interest, risks, environmental impact, social considerations and corporate governance.</p> <p>The Trustee expects all its Investment Managers to practice good stewardship. When selecting new managers, the Trustee's investment adviser assesses the ability of each Investment Manager to engage with underlying companies to promote the long-term success of the investments.</p> <p>When selecting, monitoring and de-selecting Investment Managers, engagement is factored into the decision-making process to the appropriate level for the specific asset class in question. The Trustee requires its investment adviser to report annually on how the managers have acted in accordance with the Trustee's policy on stewardship and engagement.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>The Trustee has communicated to each of its Investment Managers the importance of good stewardship, via the circulation of its Sustainable Investment Policy.</p> <p>The Investment Consultant assesses the ability of a manager to adequately engage with their underlying holdings on financially material issues.</p> <p>The ability of a manager to practice good stewardship has been assessed in each manager selection process.</p> <p>It has also been made clear to each manager that the Trustee has a preference for 'engagement' rather than 'exclusion' as a method of incorporating climate change risks into an effective risk management framework.</p>

Voting behaviour in DB Section

Legal and General Investment Management (“LGIM”)

Voting

The Trustee invests in pooled fund arrangements, and as such, it is not necessary for managers to consult with the Trustee before voting, however, they are to vote in line with the Scheme’s voting and engagement policy. As part of its wider due diligence of the implementation of investment strategies, the Trustee requests the managers to produce information that demonstrate the manager is exercising good stewardship (see table below).

	FTSE TPI Global (ex Fossil Fuels) Equity Index Fund OFC
How many meetings were you eligible to vote at over the year to 31/12/2022?	1,684
How many resolutions were you eligible to vote on over the year to 31/12/2022?	22,245
What % of resolutions did you vote on for which you were eligible?	99.7%
Of the resolutions on which you voted, what % did you vote with management?	79.7%
Of the resolutions on which you voted, what % did you vote against management?	19.7%
Of the resolutions on which you voted, what % did you abstain from?	0.6%
In what % of meetings, for which you did vote, did you vote at least once against management?	74.6%
Which proxy advisory services does your firm use, and do you use their standard voting policy or created your own bespoke policy which they then implemented on your behalf?	LGIM’s Investment Stewardship team uses ISS’s ‘ProxyExchange’ electronic voting platform to electronically vote clients’ shares. All voting decisions are made by LGIM and we do not outsource any part of the strategic decisions. To ensure our proxy provider votes in accordance with our position on ESG, we have put in place a custom voting policy with specific voting instructions.
What % of resolutions, on which you did vote, did you vote contrary to the recommendation of your proxy adviser? (if applicable)	14.5%

Most significant votes

In determining significant votes, LGIM’s Investment Stewardship team considers the criteria provided by the Pensions & Lifetime Savings Association consultation (“PLSA”). This includes but is not limited to:

- High profile vote which has such a degree of controversy that there is high client and/or public scrutiny.
- Significant client interest for a vote: directly communicated by clients to the Investment Stewardship team at LGIM’s annual Stakeholder roundtable event, or where we note a significant increase in requests from clients on a particular vote.

- Sanction vote as a result of a direct or collaborative engagement.
- Vote linked to an LGIM engagement campaign, in line with LGIM Investment Stewardship’s 5-year ESG priority engagement themes.

Some of LGIM’s most significant votes on behalf of the Trustee are as follows:

	Vote 1	Vote 2	Vote 3	Vote 4
Company name	Apple Inc.	Amazon Inc.	Alphabet Inc.	Nvidia Corporation
Date of vote	04/03/2022	25/05/2022	01/06/2022	02/06/2022
Approximate size of % holding as at the date of the vote	5.82%	3.25%	1.56%	1.01%
Summary of the resolution	Report on Civil Rights Audit	Votes for election of Director Daniel P. Huttenlocher	Report on Physical Risks of Climate Change	Votes for election of Director Harvey C. Jones
LGIM’s vote	For	Against	For	Against
Rationale	Diversity. A vote in favour is applied as LGIM supports proposals related to diversity and inclusion policies as we consider these issues to be a material risk to companies.	Human rights. A vote against is applied as the director is a long-standing member of the Leadership Development & Compensation Committee which is accountable for human capital management failings.	Shareholder Resolution - Climate change: A vote in favour is applied as LGIM expects companies to be taking sufficient action on the key issue of climate change.	Diversity. LGIM expects a company to have at least 25% women on the board with the expectation of reaching a minimum of 30% of women on the board by 2023. Independence. A vote against is applied as LGIM expects a board to be regularly refreshed in order to maintain an appropriate mix of independence, relevant skills, experience, tenure, and background.

	Vote 5	Vote 6	Vote 7	Vote 8
Company name	The Home Depot, Inc.	JPMorgan Chase & Co.	Pfizer, Inc.	Bank of America Corporation

	Vote 5	Vote 6	Vote 7	Vote 8
Date of vote	19/05/2022	17/05/2022	28/04/2022	26/04/2022
Approximate size of % holding as at the date of the vote	0.84%	0.78%	0.62%	0.61%
Summary of the resolution	Require Independent Board Chair	Votes for election of Director Todd A. Combs	Votes for election of Director Albert Bourla	Votes for election of Director Brian T. Moynihan
LGIM's vote	For	Against	Against	Against
Rationale	Shareholder Resolution - Joint Chair/CEO. A vote in favour is applied as LGIM expects companies to establish the role of independent Board Chair.	A vote AGAINST the relevant director is applied as LGIM expects companies to respond to a meaningful level of shareholder support requesting the company to implement an independent Board Chair.	Joint Chair/CEO: A vote against is applied as LGIM expects companies to separate the roles of Chair and CEO due to risk management and oversight.	Joint Chair/CEO: A vote against is applied as LGIM expects companies to separate the roles of Chair and CEO due to risk management and oversight.

Voting behaviour in DC Section

BlackRock

Voting

BlackRock's Investment Stewardship team periodically published detailed explanations of specific key votes in "vote bulletins". BlackRock consider these vote bulletins to contain explanations of the most significant votes for the purpose of the Shareholder Rights Directive II.

The Trustee invests in a mixture of actively and passively managed pooled fund arrangements..

Although for passive investment portfolios the aim is to replicate the index, the Investment Managers are able to take ESG guidelines into considerations via two key approaches:

- 1) Firstly, by selecting an index that incorporates ESG guidelines at the outset. As a valued partner to the major index providers, we provide input into their methodology and product offering.
- 2) Secondly, where clients are invested across an index and in cases are unable to sell underperforming companies, engagement with companies, including proxy voting, is a key means to integrate ESG factors into investing.

The corporate governance programme led by the Investment Stewardship team is integrated within all portfolios investing in public companies, whether clients invest in branded sustainable investing funds or in our core index-tracked and active investment strategies. The Investment Stewardship team acts as a central clearinghouse of BlackRock’s views across the various portfolios with holdings in individual companies and aims to present a consistent message. BlackRock determine their engagement priorities based on their observation of market developments and emerging governance themes and evolve them year over year, as necessary. The team’s key engagement priorities include:

- Board quality
- Environmental risks and opportunities
- Corporate strategy and capital allocation
- Compensation that promotes long-termism
- Human capital management

Most significant votes

Company:	Amazon.com Inc
Date:	25 May 2022
Resolutions:	<ul style="list-style-type: none"> • Commission a Third-Party Audit on working conditions (Shareholder proposal)
BlackRock Vote:	BlackRock voted against the resolution.
Rationale:	<p>The shareholder proposal requested that the Board “commission an independent audit and report of the working conditions and treatment that Amazon warehouse workers face, including the impact of its policies, management, performance metrics, and targets.”</p> <p>BlackRock’s Investment Stewardship team did not support this shareholder proposal because they believe that the company’s existing disclosure and policies already meet the proponent’s request.</p>

Company:	Rio Tinto Group (Rio Tinto plc and Rio Tinto Limited)
Date:	8 April 2022 (Rio Tinto plc); 5 May 2022 (Rio Tinto Limited)
Resolutions:	<ul style="list-style-type: none"> • Approve Climate Action Plan
BlackRock Vote:	BlackRock voted for the proposal

Rationale:	<p>Management proposed an advisory, non-binding shareholder vote on the Rio Tinto Group’s Climate Action Plan as set out in the special report “Our Approach to Climate Change 2021.”</p> <p>BlackRock’s Investment Stewardship team voted for the proposal. The group’s climate action plan, targets, and disclosures are consistent with what BlackRock look for and, in their assessment, demonstrate management and board responsiveness to shareholder feedback. Accordingly, they determined that it is in the best interests of clients as long-term shareholders to support the proposal to approve the Climate Action Plan.</p>
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Final Remarks:

Overall, the Trustee has demonstrated key actions for the Scheme during the relevant reporting period that show how it continues to make investment decisions in line with the policies set out in the SIP.

The reporting period for this Statement covers 1st January 2022 to 31st December 2022. Any actions undertaken by the Trustee after this date will be covered in the next Statement. The Trustee considers Stewardship and effective engagement important tools to achieving more sustainable outcomes and where applicable, the Trustee does seek to incorporate its voting and engagement policies into its appointment terms with managers.