

# The Cronite Pension Scheme (the “Scheme”)

## Implementation Statement 6 April 2020 – 5 April 2021

The 2019 Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations (“the Regulations”) require that the Trustees outline how they have ensured compliance with the policies and objectives set out in their Statement of Investment Principles (SIP) over the course of the year under review.

The Trustees Stewardship and Engagement policies are included in the Scheme’s SIP.

### ***Changes to the SIP during the year regarding Stewardship and Engagement***

The SIP has been reviewed and revised over the period. The revised SIP includes the Trustee’s policies regarding asset manager incentives, evaluation and monitoring as required by the updated legislation for SIPs. The current SIP dated September 2020 be accessed here:

<https://www.schemedocs.co.uk/cronite-pension-scheme/>

### ***Meetings with fund managers***

During the course of the year, the Trustees have not received presentations from any of the investment managers with whom they are invested, although they did regularly review the performance of the Scheme’s investments.

### ***Reviews of fund managers***

The Trustees monitor the performance of their investment managers and review their appointments regularly. As part of the review of fund managers, the Trustees also aim to monitor investment manager remuneration, philosophy and engagement policies on a regular basis as described in the SIP.

### ***Compliance with SIP for BL units***

The Trustees are required to monitor the extent to which the SIP has been followed for the BL units. Given that the SIP requires these units to be held in the Scheme bank account, the Trustees are satisfied that the SIP has been entirely followed in respect of the BL units over the period.

### ***Stewardship***

The UK Stewardship Code is a voluntary code for asset managers, asset owners and service providers, aimed to improve stewardship standards and encourage active and engaged monitoring of corporate governance in the interests of beneficiaries.

Over the period the Scheme’s investments were managed by M&G Investment Management Limited (M&G) and Legal and General Investment Management (LGIM), both of which are tier 1 signatories to the UK Stewardship code.

Both M&G and LGIM are signatories to the UN Principles for Responsible Investment (UN PRI), achieving A+ or A in all categories on their UN PRI scorecards. The UN PRI are a set of global best practices that provide a framework for integrating ESG issues into financial analysis, investment decision-making and ownership practices.

### ***Voting behaviour***

Appendix A summarises the voting behaviour of each fund in which the Trustees invest.

The Trustees’ policy is to delegate the exercise of voting rights to their managers, but to review the voting behaviour of the managers annually to check that they are comfortable with the decisions taken

by the managers and their approach generally. Having reviewed the information summarised in Appendix A, the Trustees are satisfied with the way in which the managers are exercising voting rights.

### ***The Trustee's policies on ESG considerations***

The Trustees believe that good stewardship and Environmental, Social and Governance (ESG) issues may have a material financial impact on investment returns.

The Trustees have elected to invest in pooled funds, and therefore, have little or no influence on their managers' ESG and Stewardship behaviour, including the exercise of voting rights. The Trustees have given each individual fund manager their full discretion when evaluating ESG issues and in exercising rights, engagement activities, and stewardship obligations attached to the Scheme's investments. However, the Trustees review their existing manager's policies at least annually and will consider such policies in all future selections of investment managers.

The Trustees are aware that stewardship and ESG consideration involve an ongoing process of education for themselves and engagement with their investment managers. To that end they dedicate time regularly to the discussion of this topic and intent to review and renew their approach periodically with the help of their investment consultants, where required.

### ***Statement of compliance with Regulations***

Over the course of the accounting year, the Trustees are pleased to report that they have in their opinion adhered to the policies set out in their SIP and have complied with the Regulations.

## Appendix A – voting behaviour of managers

### M&G Investment Management Limited

The Scheme was invested in the following M&G funds:

- All Stocks Corporate Bond
- Prudential Absolute Return

The manager has confirmed that the All Stocks Corporate Bond fund does not hold listed equities and there are no votes associated with this fund.

M&G have provided the following information regarding voting behaviour and policies for the Prudential Absolute Return fund over the period:

VOTING QUESTIONNAIRE		Cronite Castings Limited	
<b>Scheme Name</b>	The Cronite Pension Scheme		
<b>Employer name</b>	Cronite Castings Limited		
<b>Investment Manager name</b>	M&G Investment Management Limited		
<b>Fund name</b>	M&G PP Absolute Return Fund		
<b>Amended Fund Name (if different to the above)</b>			
<b>Scheme year end date</b>			
<b>Start of Reporting Period</b>	01-Apr-20		
<b>End of Reporting Period</b>	31-Mar-21		
FUND/MANDATE INFORMATION	RESPONSE	ADDITIONAL COMMENTS	
<b>What is the Fund's Legal Entity Identifier (LEI) (if applicable)</b>	n/a		
<b>What is the Fund's International Securities Identification Number (ISIN) (if applicable)</b>	GB00B06BS468		
<b>What was the total size of the fund/mandate as at the end of the Reporting Period?</b>	£14.99m		
<b>Total size of Scheme assets invested in the fund/mandate as at the end of the Reporting Period (if known)?</b>	n/a		
<b>What was the number of equity holdings in the fund/mandate as at the end of the Reporting period?</b>	23 underlying sector funds	The fund invests, primarily via other M&G PP funds, in a diversified mix of UK and overseas shares, bonds, property, cash and alternative assets. Active asset allocation decisions are based on the fund manager's view of the attractiveness of current market valuations compared to expected long-run returns for each asset class.	

VOTING STATISTICS (APPLICABLE TO THE SCHEME'S REPORTING PERIOD)	RESPONSE	ADDITIONAL COMMENTS
<b>How many meetings were you eligible to vote at?</b>	1126	
<b>How many resolutions were you eligible to vote on?</b>	12988	
<b>What % of resolutions did you vote on for which you were eligible?</b>	76.73	
<b>Of the resolutions on which you voted, what % did you vote with management?</b>	95.33	
<b>Of the resolutions on which you voted, what % did you vote against management?</b>	4.67	Against includes any vote not in line with the board's vote recommendation
<b>Of the resolutions on which you voted, what % did you abstain from voting?</b>	1.22	
<b>In what % of meetings, for which you did vote, did you vote at least once against management?</b>	31.78	
<b>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?</b>	<p>We use the research services of ISS and IVIS. Our voting is instructed through the ISS voting platform, ProxyExchange.</p> <p>We use the ISS custom service to flag resolutions that may not meet our policy guidelines. Voting decisions are taken by the Sustainability and Stewardship at M&amp;G often in consultation with Fund Managers. Some routine resolutions are voted by ISS on our behalf when clear criteria have not been met.</p>	
<b>What % of resolutions, on which you did vote, did you vote contrary to the recommendation of your proxy adviser? (if applicable)</b>	4.1	

IN RELATION TO THE FUND NAMED ABOVE, WHICH VOTES DURING THE REPORTING PERIOD DO YOU CONSIDER TO BE MOST SIGNIFICANT FOR THE SCHEME?

	VOTE 1	VOTE 2	VOTE 3	VOTE 4	VOTE 5
<b>Company name</b>	Samsung Electronics Co., Ltd.	Shinhan Financial Group Co., Ltd.	Pandora AS	BHP PLC	Volkswagen AG
<b>Date of vote</b>	17/03/2021	25/03/2021	11/03/2021	15/10/2020	30/09/2020
<b>Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)</b>	Not in a position to provide	Not in a position to provide	Not in a position to provide	Not in a position to provide	Not in a position to provide
<b>Summary of the resolution</b>	Elect directors	Elect Directors	Reelect Christian Frigast (Vice Chair) as Director	Approve Suspension of Memberships of Industry Associations where COVID-19 Related Advocacy is Inconsistent with Paris Agreement Goals	Approve Discharge of Management Board
<b>How you voted</b>	Against	Against	Abstain	For	Against
<b>Where you voted against management, did you communicate your intent to the company ahead of the vote?</b>	No	No	Not recorded	Yes	No
<b>Rationale for the voting decision</b>	Concerns over corporate behaviour and insufficient shareholder engagement: Incumbent directors Byung-gook Park, Jeong Kim and Sun-uk Kim have collectively failed to remove criminally convicted directors from the board. The inaction is indicative of a material failure of governance and oversight at the company.	Opposed several directors over CEO retaining board seat despite hiring malpractice. Also fraud uncovered at subsidiary.	Concern over performance in the role	Shareholder resolution support	Concerns over corporate governance
<b>Outcome of the vote</b>	Not in a position to provide	Not in a position to provide	Not in a position to provide	Not in a position to provide	Not in a position to provide
<b>Implications of the outcome eg were there any lessons learned and what likely future steps will you take in response to the outcome?</b>	Not in a position to provide	Not in a position to provide	Not in a position to provide	Not in a position to provide	Not in a position to provide
<b>On which criteria have you assessed this vote to be "most significant"?</b>	Shareholder rights and Governance	Shareholder rights and Governance	Shareholder rights and Governance	Environmental and social	Executive directors or chairperson

VOTING POLICIES	RESPONSE
<p><b>What is your policy on consulting with clients before voting?</b></p>	<p>Voting decisions are taken in the best interests of clients and decision-making takes into account a wide range of factors. Whilst we do not solicit clients' views will would take them into account should they be known to us.</p>
<p><b>Please provide an overview of your process for deciding how to vote.</b></p>	<p>An active and informed voting policy is an integral part of our investment philosophy. In our view, voting should never be divorced from the underlying investment management activity. By exercising our votes, we seek both to add value to our clients and to protect our interests as shareholders. We consider the issues, meet the management if necessary, and vote accordingly.</p>
<p><b>How, if at all, have you made use of proxy voting services?</b></p>	<p>We use research provided by ISS and the Investment Association; and we use the ProxyEdge platform from ISS voting platform for managing our proxy activity.</p>
<p><b>What process did you follow for determining the “most significant” votes?</b></p>	<p>Under the Shareholder Rights Directive II, M&amp;G is required to report on its stewardship activities, including proxy voting and the identification of significant votes. We have therefore determined our own definition of significant votes following internal discussion and consideration of external guidance. For the purposes of reporting to clients under the requirements of pensions regulations we have typically disregarded our 3% shareholding criterion.</p>
<p><b>Did any of your “most significant” votes breach the client’s voting policy (where relevant)?</b></p>	<p>n/a</p>
<p><b>If ‘Y’ to the above. Please explain where this happened and the rationale for the action taken.</b></p>	<p>n/a</p>
<p><b>Are you currently affected by any of the following five conflicts, or any other conflicts, across any of your holdings?</b></p> <ol style="list-style-type: none"> <li><b>1) The asset management firm overall has an apparent client-relationship conflict e.g. the manager provides significant products or services to a company in which they also have an equity or bond holding;</b></li> <li><b>2) Senior staff at the asset management firm hold roles (e.g. as a member of the Board) at a company in which the asset management firm has equity or bond holdings</b></li> <li><b>3) The asset management firm’s stewardship staff have a personal relationship with relevant individuals (e.g. on the Board or the company secretariat) at a company in which the firm has an equity or bond holding</b></li> <li><b>4) There is a situation where the interests of different clients diverge. An example of this could be a takeover, where one set of clients is exposed to the target and another set is exposed to the acquirer</b></li> <li><b>5) There are differences between the stewardship policies of managers and their clients</b></li> </ol>	<p>No</p>
<p><b>Please include here any additional comments which you believe are relevant to your voting activities or processes</b></p>	<p>Our voting policy and our voting records are published on our website. The policy is regularly reviewed as it continues to evolve.</p>

## Legal & General Investment Management

The Scheme was invested in the following LGIM funds:

- FABP: Matching Core Fix Short Ser 1
- FABR: Matching Core Fix Long Ser 1
- FABS: Matching Core Real Short Ser 1
- MAAC: Dynamic Diversified Fund

The manager has confirmed that, with the exception of the MAAC: Dynamic Diversified Fund, the above funds do not hold listed equities and carry not voting rights.

LGIM have provided the following information regarding voting behaviour and policies for the MAAC: Dynamic Diversified Fund over the period:

### Voting Questionnaire

Investment Manager Name	Legal and General Investment Management
Fund Name	Dynamic Diversified Fund
Fund Code	MAAC
Quasar Code	2820
Fund of Fund Structure	Yes
Scheme Year End Date	31/03/2021
Start of Reporting Period	01/04/2020
End of Reporting Period	31/03/2021

### Fund Information

Question	Response	Additional Comments
What was the total size of the fund as at 31/03/2021?	£ 2,517,513,123	Weekly close price series
What was the number of equity holdings in the fund as at 31/03/2021?	3951	

### Voting Statistics

Please answer the following questions in relation to the Fund named above.

Question	Response	Additional Comments
How many meetings were you eligible to vote at over the year to 31/03/2021?	7887	
How many resolutions were you eligible to vote on over the year to 31/03/2021?	83262	
What % of resolutions did you vote on for which you were eligible?	99.90%	
Of the resolutions on which you voted, what % did you vote with management?	84.09%	
Of the resolutions on which you voted, what % did you vote against management?	15.24%	
Of the resolutions on which you voted, what % did you abstain from?	0.68%	
In what % of meetings, for which you did vote, did you vote at least once against management?	5.41%	
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. For more details, please refer to the Voting Policies section of this document.	
What % of resolutions, on which you did vote, did you vote contrary to the recommendation of your proxy adviser? (if applicable)	0.25%	

## Significant Votes

In relation to the Fund named above and selected period, which votes over the last 12 months, does LGIM consider to be most significant for the Plan?

	Vote 1	Vote 2	Vote 3	Vote 4
Company name	Qantas Airways Limited	Lagardère	Imperial Brands plc	Medtronic plc
Date of vote	23-Oct-20	05-May-20	03-Feb-21	11-Dec-20
Approximate size of fund's holding as at the date of the vote (as % of portfolio)				
Summary of the resolution	Resolution 3 Approve participation of Alan Joyce in the Long-Term Incentive Plan Resolution 4 Approve Remuneration Report.	Shareholder resolutions A to P. Activist Amber Capital, which owned 16% of the share capital at the time of engagement, proposed 8 new directors to the Supervisory Board (SB) of Lagardère, as well as to remove all the incumbent directors (apart from two 2019 appointments).	Resolutions 2 and 3, respectively, Approve Remuneration Report and Approve Remuneration Policy.	Resolution 3 Advisory Vote to Ratify Named Executive Officers' Compensation.
How you voted	LGIM voted against resolution 3 and supported resolution 4.	LGIM voted in favour of five of the Amber-proposed candidates (resolutions H,J,K,L,M) and voted off five of the incumbent Lagardère SB directors (resolutions A-G).	LGIM voted against both resolutions.	LGIM voted against the resolution.
Where you voted against management, did you communicate your intent to the company ahead of the vote?	Given our engagement, LGIM's Investment Stewardship team communicated the voting decision directly to the company before the AGM and provided feedback to the remuneration committee.	LGIM publicly communicates its vote instructions in monthly regional vote reports on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.
Rationale for the voting decision	The COVID crisis has had an impact on the Australian airline company's financials. In light of this, the company raised significant capital to be able to execute its recovery plan. It also cancelled dividends, terminated employees and accepted government assistance. The circumstances triggered extra scrutiny from LGIM as we wanted to ensure the impact of the COVID crisis on the company's stakeholders was appropriately reflected in the executive pay package. In collaboration with our Active Equities team, LGIM's Investment Stewardship team engaged with the Head of Investor Relations of the company to express our concerns and understand the company's views. The voting decision ultimately sat with the Investment Stewardship team. We supported the remuneration report (resolution 4) given the executive salary cuts, short-term incentive cancellations and the CEO's voluntary decision to defer the vesting of the long-term incentive plan (LTIP), in light of the pandemic. However, our concerns as to the quantum of the 2021 LTIP grant remained, especially given the share price at the date of the grant and the remuneration committee not being able to exercise discretion on LTIPs, which is against best practice. We voted against resolution 3 to signal our concerns.	Proposals by Amber were due to the opinion that the company strategy was not creating value for shareholders, that the board members were not sufficiently challenging management on strategic decisions, and for various governance failures. The company continues to have a commandite structure; a limited partnership, which means that the managing partner has a tight grip on the company, despite only having 7 % share capital and 11% voting rights. LGIM engages with companies on their strategies, any lack of challenge to these, and with governance concerns. The company strategy had not been value-enhancing and the governance structure of the company was not allowing the SB to challenge management on this. Where there is a proxy contest, LGIM engages with both the activist and the company to understand both perspectives. LGIM engaged with both Amber Capital, where we were able to speak to the proposed new SB Chair, and also Lagardère, where we spoke to the incumbent SB Chair. This allowed us to gain direct perspectives from the individual charged with ensuring their board includes the right individuals to challenge management.	The company appointed a new CEO during 2020, who was granted a significantly higher base salary than his predecessor. A higher base salary has a consequential ripple effect on short- and long-term incentives, as well as pension contributions. Further, the company did not apply best practice in relation to post-exit shareholding guidelines as outlined by both LGIM and the Investment Association. An incoming CEO with no previous experience in the specific sector, or CEO experience at a FTSE100 company, should have to prove her or himself beforehand to be set a base salary at the level, or higher, of an outgoing CEO with multiple years of such experience. Further, we would expect companies to adopt general best practice standards. Prior to the AGM, we engaged with the company outlining what our concerns over the remuneration structure were. We also indicated that we publish specific remuneration guidelines for UK-listed companies and keep remuneration consultants up to date with our thinking.	Following the end of the financial year, executive directors were granted a special, one-off award of stock options to compensate for no bonus being paid out during the financial year. LGIM voted against the one-off payment as we are not supportive of one-off awards in general and in particular when these are awarded to compensate for a payment for which the performance criterion/criteria were not met. Prior to the AGM we engaged with the company and clearly communicated our concerns over one-off payments.
Outcome of the vote	About 90% of shareholders supported resolution 3 and 91% supported resolution 4. The meeting results highlight LGIM's stronger stance on the topic of executive remuneration, in our view.	Even though shareholders did not give majority support to Amber's candidates, its proposed resolutions received approx. between 30-40% support, a clear indication that many shareholders have concerns with the board. (Source: ISS data)	Resolution 2 (Approve Remuneration Report) received 40.26% votes against, and 59.73% votes of support. Resolution 3 (Approve Remuneration Policy) received 4.71% of votes against, and 95.28% support.	The voting outcome was as follows: For: 91.73%; against: 8.23%.
Implications of the outcome eg were there any lessons learned and what likely future steps will you take in response to the outcome?	We will continue our engagement with the company.	LGIM will continue to engage with the company to understand its future strategy and how it will add value to shareholders over the long term, as well as to keep the structure of SB under review.	LGIM continues to engage with companies on remuneration both directly and via IVIS, the corporate governance research arm of The Investment Association. LGIM annually publishes remuneration guidelines for UK listed companies.	LGIM will continue to monitor this company.
On which criteria (as explained in the cover email) have you assessed this vote to be "most significant"?	It highlights the challenges of factoring in the impact of the COVID situation into the executive remuneration package.	LGIM noted significant media and public interest on this vote given the proposed revocation of the company's board.	We are concerned over the ratcheting up of executive pay; and we believe executive directors must take a long-term view of the company in their decision-making process, hence the request for executives' post-exit shareholding guidelines to be set.	We believe it is contrary to best practice in general and our pay principles in particular to award one-off awards, especially if they are to compensate for a forgone payment.

## Voting policies

Please answer the following questions in relation to the Fund named above.

Question	Response
What is your policy on consulting with clients before voting?	<p>LGIM's voting and engagement activities are driven by ESG professionals and their assessment of the requirements in these areas seeks to achieve the best outcome for all our clients. Our voting policies are reviewed annually and take into account feedback from our clients.</p> <p>Every year, LGIM holds a stakeholder roundtable event where clients and other stakeholders (civil society, academia, the private sector and fellow investors) are invited to express their views directly to the members of the Investment Stewardship team. The views expressed by attendees during this event form a key consideration as we continue to develop our voting and engagement policies and define strategic priorities in the years ahead. We also take into account client feedback received at regular meetings and/ or ad-hoc comments or enquiries.</p>
Please provide an overview of your process for deciding how to vote.	<p>All decisions are made by LGIM's Investment Stewardship team and in accordance with our relevant Corporate Governance &amp; Responsible Investment and Conflicts of Interest policy documents which are reviewed annually. Each member of the team is allocated a specific sector globally so that the voting is undertaken by the same individuals who engage with the relevant company. This ensures our stewardship approach flows smoothly throughout the engagement and voting process and that engagement is fully integrated into the vote decision process, therefore sending consistent messaging to companies.</p>
How, if at all, have you made use of proxy voting services over the year to 31/03/2021?	<p>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. Our use of ISS recommendations is purely to augment our own research and proprietary ESG assessment tools. The Investment Stewardship team also uses the research reports of Institutional Voting Information Services (IVIS) to supplement the research reports that we receive from ISS for UK companies when making specific voting decisions.</p> <p>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. These instructions apply to all markets globally and seek to uphold what we consider are minimum best practice standards which we believe all companies globally should observe, irrespective of local regulation or practice.</p> <p>We retain the ability in all markets to override any vote decisions, which are based on our custom voting policy. This may happen where engagement with a specific company has provided additional information (for example from direct engagement, or explanation in the annual report) that allows us to apply a qualitative overlay to our voting judgement. We have strict monitoring controls to ensure our votes are fully and effectively executed in accordance with our voting policies by our service provider. This includes a regular manual check of the votes input into the platform, and an electronic alert service to inform us of rejected votes which require further action.</p> <p><a href="https://www.lgim.com/landq-assets/lgim/_document-library/capabilities/how-lgim-uses-proxy-voting-services.pdf">For more information on how we use the services of proxy providers, please refer to the following document available on our website: https://www.lgim.com/landq-assets/lgim/_document-library/capabilities/how-lgim-uses-proxy-voting-services.pdf</a></p>
What process did you follow for determining the "most significant" votes?	<p>As regulation on vote reporting has recently evolved with the introduction of the concept of 'significant vote' by the EU Shareholder Rights Directive II, LGIM wants to ensure we continue to help our clients in fulfilling their reporting obligations. We also believe public transparency of our vote activity is critical for our clients and interested parties to hold us to account.</p> <p>For many years, LGIM has regularly produced case studies and/ or summaries of LGIM's vote positions to clients for what we deemed were 'material votes'. We are evolving our approach in line with the new regulation and are committed to provide our clients access to 'significant vote' information.</p> <p>In determining significant votes, LGIM's Investment Stewardship team takes into account the criteria provided by the Pensions &amp; Lifetime Savings Association (PLSA) guidance. This includes but is not limited to:</p> <ul style="list-style-type: none"> <li>• High profile vote which has such a degree of controversy that there is high client and/ or public scrutiny;</li> <li>• 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;</li> <li>• Sanction vote as a result of a direct or collaborative engagement;</li> <li>• Vote linked to an LGIM engagement campaign, in line with LGIM Investment Stewardship's 5-year ESG priority engagement themes.</li> </ul> <p>We provide information on significant votes in the format of detailed case studies in our quarterly ESG impact report and annual active ownership publications.</p> <p>The vote information is updated on a daily basis and with a lag of one day after a shareholder meeting is held. We also provide the rationale for all votes cast against management, including votes of support to shareholder resolutions.</p> <p>If you have any additional questions on specific votes, please note that LGIM publicly discloses its vote instructions on our website at:</p> <p><a href="https://vds.issgovernance.com/vds/#/MjU2NQ==/">https://vds.issgovernance.com/vds/#/MjU2NQ==/</a></p>
Are you currently affected by any conflicts, across any of your holdings?	<p><a href="https://www.lgim.com/api/epi/documentlibrary/view?id=1116980ea5bf43fa9801c212be73f487&amp;id=literature.html?cid=">Please refer to the LGIM investment stewardship conflict of interest document at the following link: https://www.lgim.com/api/epi/documentlibrary/view?id=1116980ea5bf43fa9801c212be73f487&amp;id=literature.html?cid=</a></p>

<p>Please include here any additional comments which you believe are relevant to your voting activities or processes</p>	<p>It is vital that the proxy voting service are regularly monitored and LGIM do this through quarterly due diligence meetings with ISS. Representatives from a range of departments attend these meetings, including the client relationship manager, research manager and custom voting manager. The meetings have a standing agenda, which includes setting out our expectations, an analysis of any issues we have experienced when voting during the previous quarter, the quality of the ISS research delivered, general service level, personnel changes, the management of any potential conflicts of interest and a review of the effectiveness of the monitoring process and voting statistics. The meetings will also review any action points arising from the previous quarterly meeting.</p> <p>LGIM has its own internal Risk Management System (RMS) to provide effective oversight of key processes. This includes LGIM's voting activities and related client reporting. If an item is not confirmed as completed on RMS, the issue is escalated to line managers and senior directors within the organisation. On a weekly basis, senior members of the Investment Stewardship team confirm on LGIM's internal RMS that votes have been cast correctly on the voting platform and record any issues experienced. This is then reviewed by the Director of Investment Stewardship who confirms the votes have been cast correctly on a monthly basis. Annually, as part of our formal RMS processes the Director of Investment Stewardship confirms that a formal review of LGIM's proxy provider has been conducted and that they have the capacity and competency to analyse proxy issues and make impartial recommendations.</p>
<p>Disclaimer</p>	<p>All voting data provided in this report is produced by LGIM using data extracted from our third-party proxy-voting provider Institutional Shareholder Services' (ISS) ProxyExchange platform, an electronic voting platform used by LGIM's Investment Stewardship team to vote its clients' shares. Data relates to all votes cast in the 12-month period to [dd/mm/yyyy] by LGIM in each fund in line with our Corporate Governance &amp; Responsible Investment Policy.  <a href="https://www.lgim.com/uk/en/capabilities/corporate-governance/policies-and-voting-disclosures-uk-en/">https://www.lgim.com/uk/en/capabilities/corporate-governance/policies-and-voting-disclosures-uk-en/</a></p> <p>It does not include any voting directed by policyholders.</p> <p>Please note that this data is provided at fund-level only and can include, in the case of feeder fund structures, multiple underlying fund information.</p> <p>Please note that for the purposes of voting reporting, a proxy fund - UK Index Trust (9028) is used to report voting data relating to UK Equity Index Fund (2240) and not the fund/scheme specific points mentioned in the PLSA template. The UK Index Trust has the same constituents as UK Equity Index apart from constituents equal to &lt; 1% in other equity holdings.</p> <p>This report is based on the exporting the Fund Hierarchies and Valuations rather than the entire Lookthrough to the underlying data sets weighting during the reporting period. It does not take into account whether the fund directly or indirectly through an underlying fund held such securities at a point in time which made it eligible to vote i.e. the Record Date.</p> <p>Any statements made by a party other than LGIM based on the data provided are not endorsed by LGIM. Therefore, we cannot guarantee the accuracy, completeness or reliability of this report and accept no responsibility or liability whatsoever in respect of the contents of this report. We do not endorse your use of any information from this report and disclaim, to the fullest extent permissible under law, any liability which we incur as a result of such use.</p> <p>Voted proposals as a percentage of voteable proposals' may be less than 100% due to operational considerations, legal restrictions and/or the specific nature of some resolutions. For example, in instances where a shareholder nominates a slate of directors in competition to the directors nominated by the company, we may only be able to cast a vote for one slate of directors. As a result, those director related resolutions that did not receive a vote may be recorded as 'Did Not Vote'.</p>