

Energizer UK Pension Plan

Engagement Policy Implementation Statement for the year ending 5 April 2021

Introduction

The Trustee of the Energizer UK Pension Plan (the 'Plan') has a fiduciary duty to consider its approach to the stewardship of the investments, to maximise financial returns for the benefit of members and beneficiaries over the long term. The Trustee can promote an investment's long-term success through monitoring, engagement and/or voting, either directly or through the Plan's investment managers.

This statement sets out how, and the extent to which, in the opinion of the Trustee, the policies set out in the Statement of Investment Principles on the exercise of rights (including voting rights) attaching to the investments, and engagement activities have been followed during the year ending 5 April 2021. This statement also describes the voting behaviour by, or on behalf of, the Trustee.

The Trustee, in conjunction with its investment consultant, appoints the Plan's investment managers and chooses the specific pooled funds to use in order to meet specific policies. The Trustee expects that the investment managers make decisions based on their assessment about the financial performance of underlying investments (including environmental, social and governance (ESG) factors, and that they engage with issuers of debt or equity to improve their performance (and thereby the Plan's performance) over an appropriate time horizon. The Trustee has decided not to take non-financial matters into account when considering its policy objectives.

During the year, the Trustee received training from their investment consultant on ESG issues, including stewardship and engagement.

Stewardship - monitoring and engagement

The Trustee recognises that investment managers' ability to influence the companies in which they invest will depend on the nature of the investment.

The Trustee's policy is to delegate responsibility for the exercising of rights (including voting rights) attaching to investments to the investment managers and to encourage the managers to exercise those rights. The investment managers are expected to provide regular reports for the Trustee detailing their voting activity.

The Trustee's policy is to delegate responsibility for engaging and monitoring investee companies to the investment managers and the Trustee expects the investment managers to use their discretion to maximise financial returns for members and others over the long term. As all of the investments are held in pooled vehicles, the Trustee does not envisage being directly involved with peer to peer engagement in investee companies.

Investment manager engagement policies

The Plan's investment managers are expected to have developed and publicly disclosed an engagement policy. This policy, amongst other things, provides the Trustee with information on how the investment managers engage in dialogue with the companies they invest in and how they exercise voting rights. It also provides details on the investment approach taken by the investment manager when considering relevant factors of the investee companies, such as strategy, financial and non-financial performance and risk, and applicable social, environmental and corporate governance aspects.

Links to each investment manager's engagement policy or suitable alternative is provided in the Appendix. These policies are publicly available on each investment manager's websites.

Exercising rights and responsibilities

The Trustee recognises that different investment managers should not be expected to exercise stewardship in an identical way, or to the same intensity.

The investment managers are expected to disclose annually a general description of their voting behaviour, an explanation of the most significant votes cast and report on the use of proxy voting advisers. BlackRock may use proxy advisers for the purposes of providing research, advice or voting recommendations that relate to the exercise of voting rights.

The Trustee does not carry out a detailed review of the votes cast by or on behalf of their investment managers but relies on the requirement for the investment managers to provide a high-level analysis of their voting behaviour.

The Trustee considers the proportion of votes cast, and the proportion of votes against management to be an important (but not the only) consideration of investor behaviour.

The latest available information provided by the investment managers is as follows:

Voting behaviour			
Investment manager	Period	Proportion of votes cast	Proportion of votes against management
BlackRock Investment Management	12 months to 31 Mar 2021	94.8%	5.9%

The voting data is fund-specific; it relates to the Plan's investment in the BlackRock Aquila Life Currency Hedged Global Equity Index Fund.

Examples of significant votes cast:

888 Holdings Plc – Voted against proposal to re-elect the Chairman of the Board as they were not deemed independent and a lead independent director had not been identified.

AAC Technologies Holdings, Inc.- Voted against proposal approving the issuance of Equity or Equity-Linked Securities without Pre-emptive Rights as this authority was not in shareholders' best economic interests as it would give the board excessive discretion on terms of issuance.

Aalberts NV – Voted against proposal to re-elect a director to the Board as they serve on an excessive number of public company boards which BlackRock believe raises substantial concerns about the director's ability to exercise sufficient oversight on the Board.

Trustee's assessment

The Trustee has considered the environmental, social and governance rating for each fund/investment manager provided by the investment consultant, which includes consideration of voting and/or engagement activities. This also includes those funds that do not hold listed equities.

The Trustee has reviewed the investment managers' policies relating to engagement and voting and how they have been implemented and have found them to be acceptable at the current time.

The Trustee recognises that engagement and voting policies, practices and reporting, will continue to evolve over time and are supportive of their investment managers being signatories to the United Nations' Principles for Responsible Investment and the Financial Reporting Council's UK Stewardship Code 2020.

Appendix

Links to the engagement policies for each of the investment managers can be found here:

Investment manager	Engagement policy
BlackRock Investment Management	https://www.blackrock.com/corporate/literature/fact-sheet/blk-responsible-investment-engprinciples-global.pdf
Aegon	https://www.aegon.com/about/governance/compliance/general-governance/Compliance/engagement-policy/

The Implementation Statement for the Energizer UK Pension Plan was approved by the Trustee, PTL Governance Ltd, on 21 September 2021. (Updated for additional voting disclosure 12 October 2021).