

APPENDIX 1 - IMPLEMENTATION STATEMENT AS AT 5TH APRIL 2024

The Trustees of the Jelson Limited Pension & Life Assurance Scheme (“the Scheme”) have prepared this implementation statement in compliance with the governance standards introduced under The Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019. This statement covers the period 6th April 2023 to 5th April 2024.

The Trustees are required to produce a yearly statement to set out how, and the extent to which, they have followed the policies on voting, stewardship and engagement as set out in the Scheme’s Statement of Investment Principles (“SoIP”), dated July 2023, during the scheme year.

The statement is also required to include a description of the voting behaviour during the scheme year by, and on behalf of, the Trustees (including the most significant votes cast by the Trustees or on their behalf and state any use of the services of a proxy voter during the scheme year).

A. Voting and Engagement Policy

The policy as set out in the SoIP in respect of voting, stewardship and engagement is in summary as follows:

- i) Voting decisions on stocks are delegated to the investment managers of the pooled funds held by the Scheme. Throughout the year, the Scheme held investments with a single investment manager, Legal and General Investment Management (“the Investment Manager”).
- ii) The Investment Manager has full discretion for undertaking engagement activities in respect of the investments.
- iii) The Investment Manager will report on voting and engagement activity to the Trustees on a periodic basis together with its adherence to the UK Stewardship Code. The Trustees will consider whether the approach taken was appropriate or whether an alternative approach is necessary.
- iv) The Trustees consider the long-term financial interests of the Scheme to be paramount but, where appropriate and practical, expect the Investment Manager to consider financially material Environmental, Social and Governance (“ESG”) issues in investment decision-making and to practice good stewardship.

The Investment Manager is expected to undertake good stewardship and positive engagement in relation to the Scheme’s investments. The Trustees consider that the long-term financial risks to the Scheme and ESG factors, including climate risk, are potentially material.

The Trustees have implemented this policy as described and in particular:

- Have received reports from the investment manager regarding voting and engagement.
- In light of such reports and otherwise, considered their policy in regard to voting and stewardship and concluded that the current policy is appropriate.

No changes were made to the voting and engagement policies in the SoIP during the scheme year. The Trustees have not set stewardship priorities for the Scheme because the time to buy-out is expected to be relatively short and because the investment strategy has been de-risked.

B. Voting Record

As the Scheme invests in pooled funds, the Trustees do not have the option of applying their own voting policy. All underlying securities in pooled funds which have voting rights are managed by the investment managers having the legal right to the underlying votes. The Scheme invests with LGIM, in the Sterling Liquidity Fund, gilt and index-linked gilt funds plus single date gilts and index-linked gilts, none of which confer voting rights. Therefore, there were no voting opportunities during the year.

The assets which the Scheme held throughout the year had no equity exposure and no voting information was disclosed by the Investment Manager in relation to the Scheme's investments. However, in terms of its general approach to these matters LGIM responded as follows.

	Legal & General
Voting policies	
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	All decisions are made by LGIM's Investment Stewardship team and in accordance with our relevant Corporate Governance & 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.
How, if at all, have you made use of proxy voting services?	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 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 & Lifetime Savings Association (PLSA) guidance. This includes but is not limited to:</p> <ul style="list-style-type: none"> • 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.

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	<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: LGIM Vote Disclosures (issgovernance.com)</p>
<p>Did any of your “most significant” votes breach the client’s voting policy (where relevant)?</p>	<p>No response to this question.</p>
<p>If “Y” to the above, please explain where this happened and the rationale for the action taken.</p>	
<p>Are you currently affected by any of the following five conflicts, or any other conflicts, across any of your holdings?</p> <p>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;</p> <p>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;</p> <p>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;</p> <p>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;</p> <p>5) There are differences between the stewardship policies of managers and their clients.</p>	<p>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&old=literature.html?cid=</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>
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C. Conclusion

The Trustees have followed the Scheme's voting and engagement policies during the scheme year by continuing to delegate to the Investment Manager the exercise of rights and engagement activities in relation to the Scheme's investments.