

IMPLEMENTATION STATEMENT

The purpose of this statement is to provide information on how, and the extent to which, the Trustee's policies in relation to the exercising of rights (including voting rights), attached to the Scheme's investments, and engagement activities have been followed during the year ended 31st March 2021 ("the reporting year"). In addition, the statement provides a summary of the voting behaviour and the most significant votes cast during the reporting year.

The Trustees' policy is to encourage the exercising of rights (including voting rights) attaching to investments, but responsibility for exercising such rights is delegated to those managing the investments and as the investments are in pooled funds, the Trustees are only able to view rather than influence the voting rights invoked by Royal London.

The Trustees accept that the assets invested in pooled funds are subject to the underlying Investment Managers' policies on corporate governance. The Trustees are satisfied that this corresponds with their responsibility to invest the assets in the best interests of members and beneficiaries and, in the case of a potential conflict of interest, in the sole interest of their members and beneficiaries. Following the 31 March 2021 year end, the Trustees have instigated a full review of investment options noting that there are some areas which need to be addressed regarding Royal London's investment strategy, particularly in light of the current global pandemic.

As part of the September 2019, and September 2020 updates to the Statement of Investment Principles (SIP), the Trustees have reviewed the effectiveness of their Investment Manager's stewardship in relation to this policy.

The Trustees have updated the SIP in order to provide clarity in relation to their approach in managing their voting rights, stewardship and review of their investment manager, and details regarding engagement activities.