

Pension and Life Assurance Plan of Penspen Limited

Implementation Statement

Year Ending 31 December 2020

Glossary

CMIG	Clerical Medical Investment Management Limited
ESG	Environmental, Social and Governance
Scheme	Pension and Life Assurance Plan of Penspen Limited
Scheme Year	1 January 2020 to 31 December 2020
SIP	Statement of Investment Principles

Introduction

The Trustee has reviewed the extent to which its policy from the SIP relating to the exercise of rights (including voting rights) attaching to the investments was followed over the Scheme Year and this statement confirms the outcome of that review.

Relevant Investments

The Scheme's assets are invested in pooled funds and some of those funds include an allocation to equities. Where equities are held, the investment manager has the entitlement to vote.

At the end of the Scheme Year, the Scheme invested entirely in the CMIG With Profits Fund.

The Trustee's Policy Relating to the Exercise of Rights

Summary of the Policy

The Trustee's policy in relation to the exercise of the rights (including voting rights) attaching to the investments is set out in the SIP.

A summary of the Trustee's policy is as follows:

- The insurance policy with Clerical Medical does not permit any investment outside of the With-Profits Fund.
- All decisions about the day-to-day management of the assets have therefore been delegated to the investment manager via a written agreement. The delegation includes decisions about the exercise of rights (including voting rights) attaching to the investments.
- The Trustee's investment manager is expected to provide reports on how they have engaged with issuers regarding social, environmental and corporate governance issues.

Has the Policy Been Followed During the Scheme Year?

The Trustee's opinion is that its policy relating to the exercise of rights (including voting rights) attaching to the investments has been followed during the Scheme Year. In reaching this conclusion, the following points were taken into consideration:

- The Trustee's investment manager has exercised the rights attached to investments on behalf of the Trustees over 2020 and further reported that they "significantly increased activity relating to responsible investment".

The Investment Manager's Voting Records

CMIG have confirmed that specific information on 'significant votes' in relation to the Clerical Medical With Profits Fund required for implementation statements is not yet currently available and there is no current timescale for when this will be available.

As such the Trustees have been unable to provide information on significant votes cast by CMIG on our behalf or the voting record of CMIG.

Approved by the Trustee of the Pension and Life Assurance Plan of Penspen Limited on 30 July 2021.