

The Pension Scheme for the British Home and Hospital for Incurables

Implementation Statement

Year Ending 31 March 2021

Glossary

Aviva	Aviva Investors
ESG	Environmental, Social and Governance
Investment Adviser	First Actuarial LLP
LV	Liverpool Victoria Asset Management
Scheme	The Pension Scheme for the British Home and Hospital for Incurables
Scheme Year	1 April 2020 to 31 March 2021
SIP	Statement of Investment Principles
UNPRI	United Nations Principles for Responsible Investment

Introduction

The Trustee has reviewed the extent to which their 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 a series of immediate and deferred annuities, none of which included an allocation to equities. As such no relevant investments were held and the Scheme's Investment Managers (Aviva and LV) did not have any rights to vote on the Trustee's behalf. Therefore, the Trustee has not analysed the voting records (including significant votes) of Aviva and LV.

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. The SIP was updated during the Scheme Year to comply with new legislation which required additional information to be stated about the nature of the arrangements in place with investment managers. Part of the new wording provided a more detailed explanation of the Trustee's policy relating to the exercise of rights.

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

- The Trustee believes that good stewardship can help create, and preserve, value for companies and markets as a whole and the Trustee wishes to encourage best practice in terms of stewardship.
- The Trustee invests in pooled investment vehicles and therefore accept that ongoing engagement with the underlying companies (including the exercise of voting rights) will be determined by the investment managers' own policies on such matters.
- When selecting a pooled fund, the Trustee considers, amongst other things, the investment manager's policy in relation to the exercise of the rights (including voting rights) attaching to the investments held within the pooled fund.
- When considering the ongoing suitability of an investment manager, the Trustee (in conjunction with their investment adviser) will take account of any particular characteristics of that manager's engagement policy that are deemed to be financially material.
- If it is identified that a fund's investment manager is not engaging with companies the Trustee may look to replace that fund. However, in the first instance, the Trustee would normally expect their investment adviser to raise the Trustee's concerns with the investment manager.

Has the Policy Been Followed During the Scheme Year?

The Trustee's opinion is that their 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:

- There has been no change to the Trustee's belief regarding the importance of good stewardship.
- The Scheme's invested assets remained invested in pooled funds over the period.
- The Trustee did not select any new funds during the period.
- The Scheme did not hold any relevant investments during the Scheme Year.

Rosemary Kennell

Date: 9 September 2021

Signed on behalf of the Trustee of the Pension Scheme for the British Home and Hospital for Incurables