

## Implementation statement – Covering 1 April 2021 to 30 September 2022

The Trustees of The Federated Pension Scheme for British Association of Occupational Therapists Limited (the “Scheme”) are required to produce a yearly statement to set out how, and the extent to which, the Trustees have followed the Scheme’s Statement of Investment Principles (“SIP”) during the previous Scheme year. This statement also includes the details of any reviews of the SIP during the year, any changes that were made together with the reasons for any changes. This is the first implementation statement produced by the Trustees.

A description of the voting behaviour during the year, either by or on behalf of the Trustees, or if a proxy voter was used, also needs to be included within this statement.

This statement should be read in conjunction with the SIP and has been produced in accordance with The Pension Protection Fund (Pensionable Service) and Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018 and the subsequent amendment in The Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019.

A copy of the most recent SIP can be found at:

<https://www.apexgroup.com/statement-of-investment-principles/the-federated-pension-scheme-for-baot-limited/>

The Trustees confirm that a new SIP was produced on 18 September 2020 to cover:

- the Trustees’ policy on financially material considerations, including how those considerations are taken into account in the selection, retention and realisation of investments
- the extent (if at all) that non-financial matters are taken into account in the selection, retention and realisation of investments; and
- the Trustees’ stewardship activities (for example, how they exercise voting rights and what engagement activities they undertake).
- the expanded range of persons to be consulted and matters to be consulted upon when the Trustees and their agents undertake stewardship activities;
- the Trustees’ policy on how they arrange matters with the asset managers they use, either setting out their position on key matters or explaining the reasons why such detail is absent.

In addition, the Trustees will also not be producing an Investment Report which would have covered the following items below. This is because the Scheme is in the buy-in phase of winding up and, as such, has no say, or even underlying voting rights, on the investments backing the annuity policies:

- sets out how, and the extent to which, the stewardship policy in the new SIP has been followed during the year reported upon
- describes the voting behaviour by the Trustees (or on their behalf by asset managers / custodians) during that year, including the most significant votes cast
- states whether there has been any use of the services of a proxy voter during that year.

There have been no changes to the ESG Policy.