John Lewis Partnership Pensions Trust ("the Trust") – Defined Contribution ("DC") Section

Annual Implementation Statement – Year ending 31 March 2022

1. Introduction

This statement sets out how, and the extent to which, the Statement of Investment Principles ("SIP") produced by the Trustee has been followed during the year to 31 March 2022. This statement 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 guidance published by The Pensions Regulator.

The Trust has both a Defined Benefit ("DB") Section and DC Section. This statement covers only the DC Section; a separate statement has been prepared for the DB section.

The table later in the document sets out how, and the extent to which, the policies in the DC Section of the SIP have been followed.

2. Trust Governance

2.1. The Trustee Board

During the course of the year, there were some changes to the membership of the Trustee Board. Andrew Ingram, one of the elected Trustee Directors, ended his trusteeship on 30 September 2021. Matthew Day and George Sergent were the newly elected Trustee Directors with terms of office from 1 October 2021, replacing Andrew Ingram and also Hollie Culham, who had left the Partnership on 20 November 2020. Rebecca Law was appointed by the Partnership as a Trustee Director from 3 June 2021, to replace Stephen Hider who left the Partnership on 31 January 2021.

The Trustee Board has Sub-Committees in place with each Sub-Committee given a particular area of focus (for example Defined Benefit or Defined Contribution matters). Terms of reference are in place for each Sub-Committee.

The Trustee Board is supported in its activities by the in-house Trustee Services team at John Lewis.

2.2. Trustee knowledge and understanding

The Trustee has received training on a number of areas during the year covering climate risk and the upcoming requirements associated with the Taskforce for Climate Related Financial Disclosures ("TCFD").

2.3. Holding advisers and managers to account

The Trustee recognises the need to hold investment managers and advisers to account.

In December 2019, the Trustee put in place investment objectives for its Investment Consultant, Mercer, and its performance will be reviewed on a regular basis. The objectives may be revised at any time but will be reviewed at least every three years, and after any significant change to the Trust's investment strategy and objectives.

The intention of these objectives is to ensure the Trustee is receiving the support and advice it needs to meet its investment objectives. The objectives set covered both short and long term objectives across strategy, monitoring, compliance and regulation, client servicing and relationship management and member engagement and communications.

3. Statement of Investment Principles

3.1. Investment Objectives of the Trust

The Trustee believes it is important to consider the policies in place in the context of the investment objectives it has set. The objectives of the Trust included in the latest DC Section SIP are as follows:

- *The Trustee's aim is to design a default investment strategy that will be suitable for the majority of members with the objective of enabling them to maximise the return of their DC pension savings while carefully managing the costs and investment risks.*
- *The Trustee also aims to provide a range of other self-select investment options for members who wish to have a higher level of*

control over their savings and/or feel the default strategy does not meet their requirements and/or appetite for risk.

3.2 Review of the SIP

The Trustee last formally reviewed the SIP in September 2020. Over the past 12 months, no changes were made to the SIP nor as part of the annual review. The Trustee consulted with the sponsoring company in finalising the SIP.

The latest SIP is publicly available and can be accessed via this link: https://www.johnlewispartnership.co.uk/meta/jlp-trust-for-pensions.html.

3.3 Assessment of how the policies in the SIP have been followed for the year to 31 March 2022

The information provided in the following section highlights the work undertaken by the Trustee during the Trust year to 31 March 2022 and sets out how this work followed the Trustee's policies in the SIP.

In summary, it is the Trustee's view that the policies in the SIP have been followed during the Trust year to 31 March 2022.

Strategic Asset Allocation

	Policy	Location in SIP	How the policy has been met over the year to 31 March 2022
1	**Kind of investments to be held**		During the last Trust year, a decision was taken to add some new underlying funds to the JLP Global Equity Fund and JLP Diversified Growth Fund. These were implemented on 1 May 2021.
2	**The balance between different kinds of investments**	Section 17-19	The default investment option was also subject to its formal triennial review in March/April 2021. The investments (fund type, management style, fund range, at retirement target and asset allocations) used in the default investment option were reviewed as part of the exercise. Based on the current profile of the membership some changes were made to the current strategy to ensure it remains suitable and appropriate for the members. Discussions are ongoing on appropriate implementation of the changes and this will be reflected in an updated SIP once the discussions are complete.
3	**Risks, including the ways in which risks are to be measured and managed**	Section 29-32	As detailed in the risk section of the SIP, the Trustee considers both quantitative and qualitative measures for risks when deciding investment policies, strategic asset allocation, the choice of investment managers, their funds and respective asset classes. The Trustee reviewed the measurement of a number of these risks on a quarterly basis during the year as part of its regular investment performance monitoring. The Trustee also received ad hoc updates from both its Investment Consultant and the Pensions Investment Manager as and when required over the course of the year
4	**Expected Return on Investments**	Section 17-19	The investment performance was reviewed by the Trustee on a quarterly basis – this included the risk and return characteristics of the investment manager strategies used by the Trust. Individual funds were specifically monitored against their respective aims and objectives as well as being compared to peer group risk and return metrics.

Investment Mandates

	Policy	Location in SIP	How the policy has been met over the year to 31 March 2022
5	**Securing compliance with the legal requirements about choosing investments**	Section 3	The Trust's Investment Consultant attended all DC Committee ("DCC") meetings during the year and provided updates on fund performance and, where required, appropriateness of the investments used by the Trust. When new investments were implemented during the course of the Trust year the Trustee obtained and considered written advice from a suitably qualified person.
6	**Realisation of Investments**	Section 16	Assets are invested in daily priced and daily traded pooled funds which hold liquid assets. The pooled funds are commingled investment vehicles which are managed by various investment managers. The selection, retention and realisation of assets within the pooled funds are managed by the respective investment managers. The funds are accessed via an Investment Platform and are held through a long-term insurance policy issued by Legal & General Assurance Society ("LGAS").
7	**Financial and non-financial considerations and how those considerations are taken into account in the selection, retention and realisation of investments**	Section 22 and 30	The Trustee considers that the key investment risks identified in Paragraph 30 of the SIP to be financially material. The Trustee believes the appropriate time horizon within which to assess these considerations should be viewed by the Trustee at a member level. This will be dependent on the member's age and their selected retirement age. The majority of these risks are monitored on a quarterly basis by the DCC through the quarterly performance reporting - this includes the risk and return characteristics of the investment managers' funds invested in by the Trust. All of the risks identified are also considered as part of the formal strategic review process undertaken by the Trustee at least every 3 years with the latest review being undertaken in March/April 2021. Section 22 of the SIP sets out the Trustee's belief that ESG and climate change can affect the long-term performance and sustainability of the Trust's investments and therefore, that the management of ESG risks can assist the Trustee in fulfilling its investment duties. The Trustee, in conjunction with the Pensions Investment Manager, carries out an annual assessment of how its investment managers consider ESG risks and opportunities and whether they are being managed effectively by the manager(s). This is carried out via an assessment of the responses to a questionnaire sent to the investment managers. The Trustee also considers the ESG ratings provided by Mercer for each of the Trust's investment managers when making this assessment along with ratings from the United Nations supported Principles for Responsible Investment ("PRI"). The latest review was tabled and considered at the September 2021 DB Committee ("DBC") meeting. The Trustee noted positive progress in the Trust's investment managers' adoption and implementation of ESG policies and will continue to engage with the investment managers in this space.

			The Trustee proposes to increase the scope of their ESG assessments of the investment managers and will also consider detailed analysis of climate-related risks and metrics in the future. The Trustee formed a Climate Change Working group and established appropriate TCFD governance arrangements ahead of 31 March 2022. The Trustee believes that active ownership can enhance the value of the Trust’s underlying portfolio and help manage risks. In September 2018, the Trustee became a signatory to the PRI. The Trustee reviews its stewardship policy to ensure that it continues to hold its investment managers to account on voting and engagement. The latest review was carried out in September 2021, with the Trustee and Pensions Investment Manager assessing the corporate engagement and voting policies of the Trust’s managers. The Trustee uses the results of the review to engage with the Trust’s managers. Non-financial matters have not been taken into consideration during the Trust year in respect of the default strategy although are relevant to the self-select fund range and in particular the JLP Ethical Equity Fund, which takes certain non-financial matters into account in its investments.

Monitoring the Investment Managers

	Policy	Location in SIP	How the policy has been met over the year to 31 March 2022
8	**Incentivising investment managers to align their investment strategies and decisions with the Trustees’ policies**	Section 24	In the year to 31 March 2022, the Trustee discussed the continued appointment of the Trust’s investment managers. The Trustee has selected appropriate investment mandates to align with its overall investment strategy. When reviewing and monitoring the Trust’s investment managers, the Trustee takes into consideration the Investment Consultant’s research ratings. The Trustee is also assisted by the Pensions Investment Manager, via their quantitative analysis and interactions with the Trust’s investment managers, in the assessment of the continued appointment of the Trust’s investment managers.
9	**Incentivising the asset manager to make decisions based on assessments about medium to long-term financial and non-financial performance of an issuer of debt or equity**	Section 25	The Trustee monitors the performance of the Trust’s investments throughout the year. The work the Trustee has undertaken during the year on assessing how their investment managers consider ESG risks and opportunities is set out under item 7. The funds in which the DC section invests are largely passive.
10	**Evaluation of the investment manager’s performance and the remuneration for asset management services**	Section 26	When considering investment performance, the Trustee focuses on long-term performance. Shorter-term performance will however also be taken into consideration. During the year, the Trustee reviewed the measurement of a number of these risks on a quarterly basis as part of its regular investment performance monitoring.

			As part of the annual Value for Members ("VfM") assessment, the Trustee reviews member borne fees, which include investment manager fees. A VfM assessment was produced in September 2022 (for year to 31 March 2022) and the Trustee concluded that, overall, the Trust provides good value for members.
11	**Monitoring portfolio turnover costs**	Section 27	Over the year covered by this statement, the Trustee considered the levels of transaction costs as part of its annual VfM assessment and published this information as part of the costs and charges disclosures mandated by regulations governing the DC Chair's Statement. While the transaction costs provided appear to be reflective of costs expected of various asset classes and markets that the Trust invests in, there is not as yet any "industry standard" benchmark or universe to compare these to. The Trustee will continue to monitor both transaction costs on an annual basis and developments in assessing these costs for value.
12	**The duration of the arrangement with the investment manager**	Section 28	There remain no set durations for investment arrangements used by the Trust. Investment managers are aware that their continued appointment is based on their success in delivering the mandate they have been appointed to manage.

ESG Stewardship and Climate Change

	Policy	Location in SIP	How the policy has been met over the year to 31 March 2022
13	**Undertaking engagement activities in respect of the investments** (including the methods by which, and the circumstances under which, trustee would monitor and engage with relevant persons about relevant matters)	Section 22	The Trustee incorporates into the SIP details on responsible investment, which cover ESG factors, stewardship, climate change and sustainable investing. The Trustee keeps the policies under regular review. In order to establish these beliefs and produce a formal policy, the Trustee undertook investment training from Legal & General Investment Management (LGIM) on ESG and Climate Risk and also undertook an investment beliefs session provided by its Investment Consultant on responsible investment, which covers ESG factors, stewardship, climate change and sustainable investing. The Trustee also received further training from their Investment Consultant on upcoming climate reporting requirements the Trust will be subject to. The Trustee recognises that where the Trust invests in pooled funds, the Trustee requires investment fund managers to engage with the investee companies on its behalf. Managers are expected to provide a summary of their ESG and stewardship policies and to comment on these issues as part of any meeting with Trustee, its in house team or advisers. Over the year, the Trustee asked its investment managers the following, which was reviewed by the Trustee in September 2021: - Whether the managers are PRI signatories and if they publicly demonstrate their commitment to responsible investment - How they incorporate ESG into their investment processes and whether there is any evidence of implementation for the Trust's mandates - Whether they have corporate engagement and voting policies - How climate-related risks are managed within the Trust's investment portfolios - If they produce carbon analytics reports for the Trust's mandates

Voting Disclosures

	Policy	Location in SIP	How the policy has been met over the year to 31 March 2022
14	**The exercise of the rights (including voting rights) attaching to the investments**	Section 25	The Trustee has delegated its voting rights to the investment fund managers. Where applicable, the Trustee expects the Trust's investment managers, unless impracticable, to exercise all voting rights attaching to shares or securities and take account of current best practice including the UK Corporate Governance Code and the UK Stewardship Code. The managers are authorised to exercise discretion to vote to reflect the best interests of the Trust. The Trustee does not use the direct services of a proxy voter, although the investment managers may employ the services of proxy voters in exercising their voting rights on behalf of the Trustee. Voting activity information from each fund and manager (where provided) is summarised on pages 16 to 20.

Voting and Engagement Activity

Sections 22 and 25 of the SIP set out the Trustee’s policies on ESG factors, stewardship and climate change. These policies set out the Trustee’s beliefs on ESG and climate change and the processes followed by the Trustee in relation to voting rights and stewardship.

Voting Activity during the Trust year

The Trustee has delegated its voting rights to the investment managers. The SIP states “The Trustee will consider the investment advisers’ assessment of how the investment managers embed ESG into their investment process. In addition, the Trustee will request information about an investment manager’s ESG policies and how the manager’s responsible investment philosophy aligns with the Trustee’s responsible investment policy. This includes the investment manager’s policy on voting and engagement”.

It is the Trustee’s view that the policy has been followed during the Trust year.

The majority of voting activity will arise in public equity funds. However, voting opportunities may arise in other asset classes such as certain bonds, property, private equity and multi-asset funds. However, the Trustee has only received information relating to public equity funds this year. The Voting and Engagement policies and activities are therefore included for the Trust’s following managers: Legal & General Investment Management (‘LGIM’) and the underlying managers Macquarie, BlackRock and HSBC.

Engagement Processes

The table below sets out the engagement process for each of the managers holding public equity.

Manager	Engagement Processes and Engagement Examples
LGIM	**Engagement Processes:** LGIM engagement strategy is focused on both the ESG scores and long-term themes: health, income inequality, climate change, privacy, data security and transparency. Within this strategy, LGIM priorities for engagement are chosen mainly to reflect LGIM overall exposures, in terms of country, sector and companies. The companies where LGIM have the biggest holdings pose the greatest risks and opportunities to market performance. At the same time, where LGIM hold large stakes have a stronger influence. LGIM focus on larger companies can have a cascading impact on other companies within the countries and sectors by helping to establish best practices. LGIM set clear timeframes for the engagement activity and consider in advance any escalation which may be required if key requests are not met. LGIM prefer to set a measurable outcome, either at market or company level. In addition to this, LGIM carry out regular engagement with investee companies on other important investment issues such as M&A, capital allocation and market-wide issues that LGIM believe threaten the long- term health of the companies that we are invested in. LGIM also engage with regulators and other policy makers to improve market standards. **Engagement Examples:** After the expansion of LGIM Climate Impact Pledge, a targeted engagement programme launched in 2016 that combines in-depth analysis of companies' climate strategies alongside voting and investment sanctions, over the year, LGIM has seen the number of companies subject to its voting sanctions for not meeting minimum climate change standards, decrease by over 35%, from 130 companies last year, to 80 this year, reflecting the positive impact of LGIM's approach and the global momentum behind climate action. Of the 80 companies subjected to voting sanctions throughout the 2022 proxy season, the oil & gas, REITs, banking, and mining sectors are amongst those most sanctioned. LGIM also identified 59 companies for deeper individual engagement. These companies, which are particularly influential within their sectors, are yet to fully embrace the transition to net-zero emissions but have the potential to have a significant positive effect across their sectors and value chains by doing so. 31 of the 59 companies identified have now set a net-zero target, a more than doubling since 2021. LGIM is also pleased to announce that Japan Post Holdings has been reinstated following progress on a number of areas of engagement – in particular the disclosure of scope 3 emissions associated with investments and the publication of interim and 2050 net-zero targets. During 2022, LGIM will further expand the reach of the programme and raise the expectations of companies' management of climate risks and opportunities.

Manager	Engagement Processes and Engagement Examples
BlackRock	**Engagement Processes:** BlackRock's main forms of engagement are in-person meetings and/or conference calls directly with the company. The BlackRock Investment Stewardship (BIS) team works closely and in conjunction with BlackRock's portfolio managers in discussions of significant governance issues. Additionally, BlackRock's investment teams leverage qualitative and quantitative company ESG information, as well as sector and industry research, from various external service providers which can be used in our analysis of and conversations with companies and with clients **Engagement Examples:** BlackRock Investment Stewardship has engaged with the General Electric Company for several years to discuss corporate governance and sustainability issues that we believe drive long-term shareholder value, including the management and board oversight of climate-related risks, sustainability disclosures, board quality and effectiveness, and executive compensation.
Macquarie	**Engagement Processes:** Engagement on ESG-related issues for global portfolios is primarily undertaken through a combination of proxy voting and direct engagement with companies. The team does not seek to be an activist investor or to make its positions publicly available, unless it takes the view this is warranted to achieve a better outcome for investors. It believes that sound corporate governance principles contribute to superior financial performance which translates to long term prosperity. Macquarie is able to potentially influence the corporate governance of companies via discussion with management or the board of directors and through exercising proxy votes. **Engagement Examples:** In March 2022, the Macquarie Investment Team engaged with Cleanaway (CWY), a waste management company. The engagement focused on CWY's plans and processes to improve on unmet environmental and social targets and areas that need improvement. The company stressed that significant progress had been made in the last two years despite there still being a way to go. Emissions targets are coming out in the next sustainability report (August 2022). Safety and environment are the largest priorities they mentioned. They have had several learnings following a fire in 2019 and environmental incidents. The company also see culture and engagement of improving quality considering how low it used to be, and the new CEO is looking to develop this from a bottom-up approach. Several projects and research are also going into gas capture at landfills. The Macquarie Investment Team is pleased with this progress so far and will continue to monitor the company's efforts.
HSBC	**Engagement Processes:** HSBC meet the management of companies and other issuers regularly as part of our active investment process. This engagement is a key element in HSBC stewardship oversight of client assets. It may form part of our monitoring of companies and issuers or represent an escalation of concerns we have identified. HSBC challenge companies and issuers on their delivery of corporate strategy, financial and non-financial performance and risk, allocation of capital and management of environmental, social and governance issues. HSBC engage

Manager	Engagement Processes and Engagement Examples
	to understand the approach management is taking and test how far they are being good stewards. HSBC also encourage companies and other issuers held in client portfolios to establish and maintain high levels of transparency, particularly in their management of ESG issues and risks. HSBC raise ESG or other concerns with companies and other issuers where HSBC believe that to be in the interest of investors, identifying company specific or systemic risks. HSBC prioritise their engagement on the basis of scale of client holdings, salience of the issues concerned, and their overall exposure to these issues. In addition to executive directors and investor relations, HSBC engage with other executives as available, including divisional and regional heads, as well as ESG and strategy specialists. HSBC also engage with non-executive directors, either as part of our regular dialogue or to raise and escalate issues of concern. Engagement is undertaken through meetings, conference calls and correspondence. HSBC occasionally co-file shareholder resolutions and support or deliver statements at shareholder meetings to communicate publicly with companies and escalate our engagement. **Engagement Examples:** Ping An was downgraded from A to BBB by MSCI in 2021 due to a methodology upgrade that increased weighting in corporate governance. HSBC shared their views of good practices for board governance and executive remuneration with the recently appointed Head of International PR. Key objectives were: To improve board disclosure over the board evaluation processes, diversity policies and corporate purpose & culture, and how these are activated; To improve the board structure, identifying board skill gaps, task and goals; To improve remuneration disclosure particularly on stock ownership in senior management and its KPIs

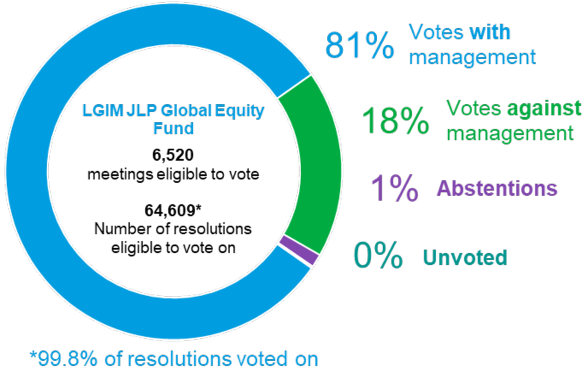
Source: Managers

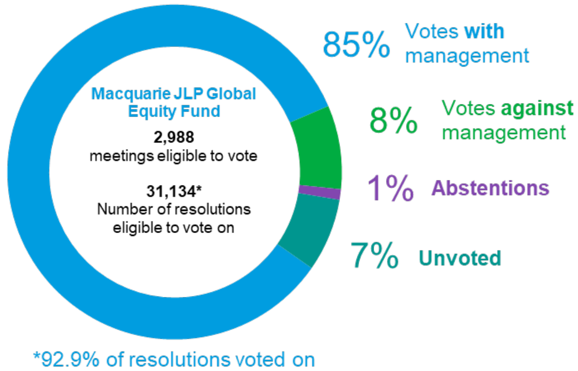
Overview of voting activity, on behalf of the Trustee, for the funds containing equity for the 12 months to 31 March 2022

Please note Votes of Abstain can be counted both as a vote of abstain but also as a Vote Against Management and hence Vote with management, vote against management and abstain from voting may add up to more than 100%.

JLP Global Equity Fund

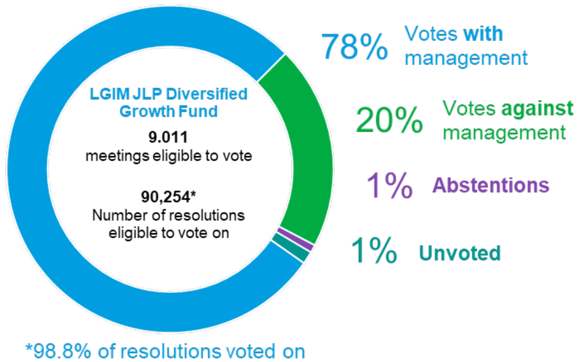
The JLP Global Equity Fund has underlying exposure to funds managed by LGIM and Macquarie. Below is a summary of the voting information provided by each manager in relation to their underlying fund.

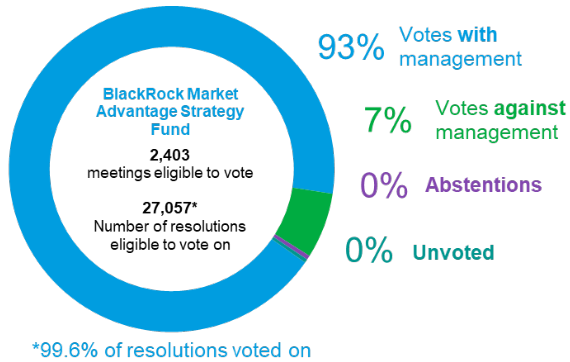




JLP Diversified Growth Fund

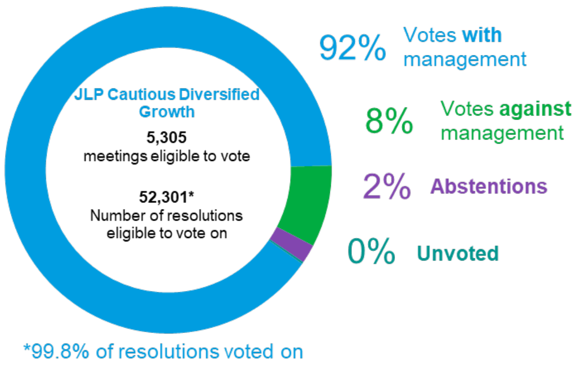
The JLP Diversified Growth Fund has underlying exposure to funds managed by LGIM and BlackRock. Below is a summary of the voting information provided by each manager in relation to their underlying fund.





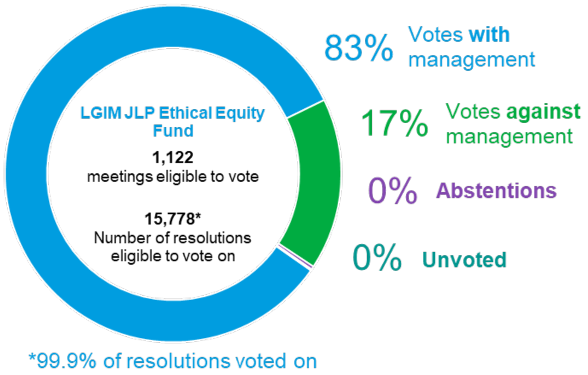
JLP Cautious Diversified Growth Fund

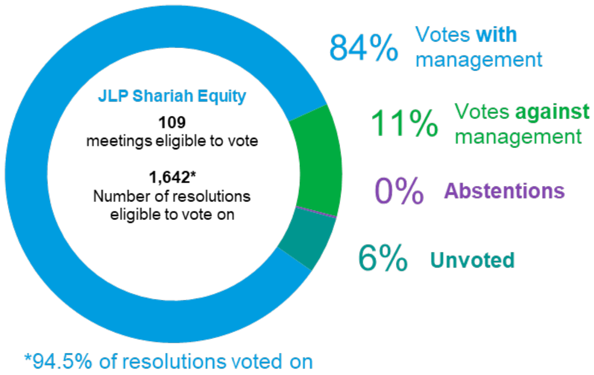
The underlying fund of the JLP Cautious Diversified Growth Fund is managed by BlackRock. Below is a summary of the voting information provided by BlackRock for the underlying fund.



Self-select funds

In addition to the funds already presented, two additional self-select funds have exposure to public equity, the JLP Ethical Equity Fund (managed by LGIM) and the JLP Shariah Equity Fund (managed by HSBC). Below is a summary of the voting information provided by each manager in relation to their underlying funds.





Use of Proxy Voting Services by the managers

The table below sets out the use of proxy voting for each of the managers holding public equity.

Manager	Use of proxy voting
LGIM	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 they do not outsource any part of the strategic decisions. LGIM's use of ISS recommendations is purely to augment their own research and proprietary ESG assessment tools. The Investment Stewardship team also uses the research reports of Institutional Voting Information Services to supplement the research reports that LGIM receive from ISS for UK companies when making specific voting decisions To ensure their proxy provider votes in accordance with their position on ESG, LGIM have put in place a custom voting policy with specific voting instructions. These instructions apply to all markets globally and seek to uphold what LGIM consider are minimum best practice standards which LGIM believe all companies globally should observe, irrespective of local regulation or practice. LGIM retain the ability in all markets to override any vote decisions, which are based on their custom voting policy. This may happen where engagement with a specific company has provided additional information (for example from direct engagement, or explanation in the annual report) that allows them to apply a qualitative overlay to their voting judgement. LGIM have strict monitoring controls to ensure their votes are fully and effectively executed in accordance with their voting policies by their service provider. This includes a regular manual check of the votes input into the platform, and an electronic alert service to inform them of rejected votes which require further action.
BlackRock	BlackRock's proxy voting process is led by the BlackRock Investment Stewardship team, which consists of three regional teams – Americas, Asia-Pacific, and Europe, Middle East and Africa. The analysts with each team will generally determine how to vote at the meetings of the companies they cover. Voting decisions are made by members of the BlackRock Investment Stewardship team with input from investment colleagues as required, in each case, in accordance with BlackRock's Global Corporate Governance and Engagement Principles and custom market-specific voting guidelines. BlackRock subscribes to research from the proxy advisory firms Institutional Shareholder Services (ISS) and Glass Lewis, as one among many inputs into their vote analysis process, and BlackRock state they do not blindly follow their recommendations on how to vote. BlackRock primarily use proxy research firms to synthesize corporate governance information and analysis into a concise, easily reviewable format so that their investment stewardship analysts can readily identify and prioritise those companies where their own additional research and engagement would be beneficial; to manage client accounts in relation to voting and facilitate client reporting on voting. Other sources of information include the company's own reporting, engagement and voting history with the company, and the views of its active investors, public information and ESG research.

Manager	Use of proxy voting
Macquarie	All voting decisions are exercised in accordance with Macquarie's voting policy. The Macquarie Systematic Investment team utilises third party researchers ISS and Ownership Matters for recommendations on proxy voting. Key considerations in the appointment and use of Ownership Matters and ISS as proxy service providers is the quality of their service and the alignment of their voting advice with the principles of Macquarie's voting policy. Due to the vast number of securities in the portfolio, all votes are lodged via proxy and Macquarie do not attend Annual General Meetings.
HSBC	HSBC use the voting research and platform provider ISS to assist with the global application of their voting guidelines. ISS reviews company meeting resolutions and provides recommendations highlighting resolutions which contravene their guidelines. HSBC review voting policy recommendations according to the scale of their overall holdings. The bulk of holdings are voted in line with the recommendation based on their guidelines.

Source: Managers

Sample of signficant votes

The Trustee has been provided with the 'most significant votes' for a number of funds within the Trust. It is not possible to disclose all the information received in this statement.

There is no official definition of what constitutes a significant vote; managers have adopted a variety of interpretations such as:

- There is a particular interest in a specific vote relating to an issue
- The potential impact on the financial outcome
- Size of the holding in the fund / mandate, and
- Whether the vote was high-profile or controversial

Therefore, the table below highlights examples of voting activity in relation to areas such as climate change/carbon emissions, separation of the role of CEO/Board Chairman and board diversity.

Fund	Company	Date	How the manager voted	Summary of the Resolution	Rationale for the Manager vote
LGIM JLP Ethical Equity Fund	Wells Fargo & Company	2021-04-27	For	Report on Racial Equity Audit	Diversity: A vote in favour is applied as LGIM supports proposals related to diversity and inclusion policies as they consider these issues to be a material risk to companies.
LGIM JLP Global Equity Fund & LGIM JLP Diversified Growth Fund	Intel Corporation	2021-05-13	For	Report on Global Median Gender/Racial Pay Gap	A vote in favour is applied as LGIM expects companies to disclose meaningful information on its gender pay gap and the initiatives it is applying to close any stated gap. LGIM views gender diversity as a financially material issue for their clients, with implications for the assets they manage on their behalf. For 10 years, they have been using their position to engage with companies on this issue. As part of their efforts to influence their investee companies on having greater gender balance, they expect all companies in which they invest globally to have at least one female on their board. Please note they have stronger requirements in the UK, North American, European and Japanese markets, in line with their engagement in these markets.

Fund	Company	Date	How the manager voted	Summary of the Resolution	Rationale for the Manager vote
LGIM JLP Global Equity Fund & LGIM JLP Diversified Growth Fund	Cigna Corporation	2021-04-28	For	Report on Gender Pay Gap	A vote in favour is applied as LGIM expects companies to disclose meaningful information on its gender pay gap and the initiatives it is applying to close any stated gap. LGIM views gender diversity as a financially material issue for their clients, with implications for the assets they manage on their behalf. For 10 years, they have been using their position to engage with companies on this issue. As part of their efforts to influence their investee companies on having greater gender balance, they expect all companies in which they invest globally to have at least one female on their board. Please note they have stronger requirements in the UK, North American, European and Japanese markets, in line with their engagement in these markets.
	Mitsubishi UFJ Financial Group, Inc.	2021-06-29	For	Amend Articles to Disclose Plan Outlining Company's Business Strategy to Align Investments with Goals of Paris Agreement	A vote in favour of this shareholder proposal is warranted as LGIM expects companies to be taking sufficient action on the key issue of climate change. While they positively note the company's recent announcements around net-zero targets and exclusion policies, they think that these commitments could be further strengthened and they believe the shareholder proposal provides a good directional push.

Fund	Company	Date	How the manager voted	Summary of the Resolution	Rationale for the Manager vote
HSBC Shariah Equity	Chevron Corporation	2021-05-26	For	Reduce Scope 3 Emissions.	HSBC support the principle of adopting quantitative GHG emission reduction targets. The company had fallen short of investors' expectations and was lagging its peers in commitments to action on climate transition.
JLP Cautious Diversified Growth	Moody's Corporation	2021-04-20	For	Approve 2020 Decarbonization Plan	Not provided
	Johnson & Johnson	2021-04-22	For	Report on Civil Rights Audit	Supportive of company's efforts to date on these issues. Proposal support based on nature of the proposal.
	Berkshire Hathaway Inc.	2021-05-01	For	Report on Climate-Related Risks and Opportunities	The company does not meet BlackRock expectations for disclosing a plan for how their business model will be compatible with a low-carbon economy. The company does not meet their expectations for disclosure of natural capital policies and/or risk.

Fund	Company	Date	How the manager voted	Summary of the Resolution	Rationale for the Manager vote
Macquarie JLP Global Equity Fund	Incitec Pivot Limited	2021-12-17	For	Approve Paris-aligned Targets	The company has set short- and medium-term targets (Scope 1 and 2) targets and has a net zero by 2050 ambition. However, these are not sufficiently robust and significantly rely on carbon-offset technologies. The company has not provided any Scope 3 targets, for which it could be taking action. Additional information regarding the company's efforts to reduce its carbon footprint and align its operations with Paris Agreement goals would allow investors to better understand how the company is managing its transition to a low carbon economy and climate change related risks.
	Gestamp Automocion SA	2021-05-06	For	Approve Annual Advisory Vote on Company's Compliance with ESG Objectives	Not provided
BlackRock Market Advantage Strategy Fund	Berkshire Hathaway Inc.	2021-05-01	For	Publish Annually a Report Assessing Diversity and Inclusion Efforts	The Company does not meet BlackRock expectations for disclosure of material diversity, equity, and inclusion policies and/or risks
	General Electric Company	2021-05-04	For	Report on Meeting the Criteria of the Net Zero Indicator	BlackRock recognizes the company's efforts to date and believe that supporting the proposal may accelerate the company's progress on climate risk management and/or oversight.

Source: Investment Managers

Looking forward

The Trustee recognises the importance of issues relating to ESG factors, stewardship and climate change, and will continue to consider these issues alongside the other risks that it monitors as part of its fiduciary duties to the Trust.

This is an evolving area and the Trustee will continue to work with its Investment Consultant and investment managers to monitor developments and consider further ways of integrating ESG factors, stewardship and climate change.

The Trustee also expects all of its investment managers to continue to provide regular reporting on their stewardship activities and their engagement efforts on behalf of the Trustee.