



WILLIAM JACKSON PENSION PLAN (“THE PLAN”)

– ANNUAL ENGAGEMENT POLICY IMPLEMENTATION STATEMENT

Introduction

This statement sets out how, and the extent to which, the Engagement Policy in the Statement of Investment Principles (‘SIP’) produced by the Trustee has been followed during the year to 5 April 2021. 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 subsequent amendment in **The Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019**.

Investment Objectives of the Scheme

The Trustee believe it is important to consider the policies in place in the context of the investment objectives it has set. The objectives of the Plan included in the SIP are as follows:

- To achieve over time a return on the Plan assets which is consistent with achieving the Plan’s funding objectives.
- To achieve this return while limiting the level of uncertainty in the Plan’s funding level to which it is exposed, as a result of the various investment risks to which the Plan is exposed.

Policy on ESG, Stewardship and Climate Change

The Plan’s SIP includes the Trustees’ policy on Environmental, Social and Governance (‘ESG’) factors, stewardship and climate change. This policy sets out the Trustees’ beliefs on ESG and climate change and the processes followed by the Trustees in relation to voting rights and stewardship. This was previously reviewed in August 2019 and again in September 2020.

In order to establish these beliefs and produce this policy, the Trustees undertook investment training provided by their investment consultant, Mercer Limited (Mercer), on responsible investment which covered ESG factors, stewardship, climate change, in September 2018 and further

Engagement Policy Implementation Statement

training was received in June 2020 in relation to ongoing disclosure requirements. During the year the Trustees set up an investment subcommittee to facilitate comprehensive ongoing review of all investment matters including ESG and climate change.

The Trustees keep their policies under regular review with the SIP subject to review at least triennially.

The following work was undertaken during the year relating to the Trustees' policy on ESG factors, stewardship and climate change, and sets out how the Trustees' engagement and voting policies were followed and implemented during the year.

- The Trustees have retained Mercer to act as discretionary investment manager in respect of the Plan's assets and such assets are invested in a range of Mercer Funds managed by MGIE. The Plan also has holdings in an external Property Fund, managed by Aviva (noting that this makes up c.10% of total Plan assets as at 5 April 2021).
- Investment managers appointed by MGIE to manage the Mercer Funds, as well as Aviva, are expected to evaluate ESG factors, including climate change considerations, and exercise voting rights and stewardship obligations attached to the investments, in accordance with their own corporate governance policies and current best practice, including the UK Corporate Governance Code and UK Stewardship Code, regardless of where they are domiciled. In addition, investment managers appointed by MGIE are expected to monitor investee companies and to report on stewardship activities and outcomes on an annual basis, as set out in a publicly available Sustainable Investment Policy.
- The Trustees considers how ESG, climate change and stewardship is integrated within Mercer's, MGIE's, the Mercer Fund underlying managers' and Aviva's investment processes in the monitoring process. Mercer, and MGIE is expected to provide reporting to the Trustees on a regular basis, at least annually, on ESG integration progress, stewardship monitoring results, and climate-related metrics. The investment subcommittee received a report in April 2021 accordingly.
- The Trustees consider how ESG, including climate change, is integrated within Mercer's, MGIE's and Aviva's investment processes by reviewing the ESG ratings assigned by Mercer (and its affiliates') global manager research team, which are included in the investment performance report produced by Mercer on a quarterly basis. ESG ratings for Mercer manager funds are reviewed by MGIE during quarterly monitoring processes, with a more comprehensive review performed annually — which seeks evidence of positive momentum on ESG integration. MGI expectations are set as ESG3 or above, where practicable and relevant to the strategy (with ESG1 being the highest rating and ESG4 being the lowest). Comparisons are also made with the appropriate universe of strategies in Mercer's global

Engagement Policy Implementation Statement

investment manager database.

- ESG ratings for Aviva's LIME property fund are reviewed by Mercer periodically with the most recent review taking place in the first quarter of 2021.

Stewardship monitoring

The majority (c.90%) of the Trustees' investments take the form of shares or units in the Mercer Funds. Any voting rights that do apply with respect to the underlying investments attached to the Mercer Funds are, ultimately, delegated to the third party investment managers appointed by MGIE. MGIE accepts that managers may have detailed knowledge of both the governance and the operations of the investee companies and has therefore enabled managers to vote based on their own proxy-voting execution policy, and taking account of current best practice including the UK Corporate Governance Code and the UK Stewardship Code. As such the Trustees do not use the direct services of a proxy voter. The MGIE Engagement Policy outlines this framework.

However, the nature of the Fund's investment strategy assets (fixed income-orientated investment strategy) means that there are no voting rights to exercise.

C.10% of the Trustees investments are via the Aviva LIME Property Fund. Aviva have prepared their Real Assets responsible Investment policy and have provided the Trustees with engagement statistics at a firm level covering the 12 month period to 31 March 2021. The Trustees note that Aviva are building out their reporting processes and Aviva Investors Real Assets are planning to begin reporting on engagement later in 2021.

Conclusion

Engagement Policy Implementation Statement

The Trustees believe that, through the actions taken, they have adhered to the Engagement Policy outlined in the Statement of Investment Principles ('SIP') over the course of the year to 5 April 2021. The work undertaken relating to the Trustees' policy on ESG factors, stewardship, and climate change, has increased the level of integration within the Plan's portfolio and overall consideration of ESG factors within the investment process.

Going forward, the Trustees will continue to review the suitability of their Engagement Policy and will work with their advisers and managers on monitoring and integrating ESG factors within their portfolio as appropriate, taking into account the risks and opportunities presented by these factors.