## **ENGAGEMENT POLICY IMPLEMENTATION STATEMENT**For the year ended 5 April 2022

#### Introduction

The Trustees of the Syfer Technology Pension Plan (the 'Plan') have a fiduciary duty to consider their approach to the stewardship of the investments, to maximise financial returns for the benefit of members and beneficiaries over the long term. The Trustees can promote an investment's long-term success through monitoring, engagement and/or voting, either directly or through their investment managers.

This statement sets out how, and the extent to which, in the opinion of the Trustees, the policies (set out in the Statement of Investment Principles) on the exercise of rights (including voting rights) attaching to the investments, and engagement activities have been followed during the year ending 5 April 2022. This statement also describes the voting behaviour by, or on behalf of, the Trustees.

The Trustees, in conjunction with their investment consultant, appoint their investment managers and choose the specific pooled funds to use in order to meet specific policies. They expect that their investment managers make decisions based on assessments about the financial performance of underlying investments (including environmental, social and governance (ESG) factors, and that they engage with issuers of debt or equity to improve their performance (and thereby the Plan's performance) over an appropriate time horizon.

The Trustees also expect their investment managers to take non-financial matters into account as long as the decision does not involve a risk of significant detriment to members' financial interests.

### Stewardship - monitoring and engagement

The Trustees recognise that investment managers' ability to influence the companies in which they invest will depend on the nature of the investment.

The Trustees' policy is to delegate responsibility for the exercising of rights (including voting rights) attaching to investments to the investment managers and to encourage the managers to exercise those rights. The investment managers are expected to provide regular reports for the Trustees detailing their voting activity.

The Trustees also delegate responsibility for engaging and monitoring investee companies to the investment managers and expect the investment managers to use their discretion to maximise financial returns for members and others over the long term.

As all of the investments are held in pooled vehicles, the Trustees do not envisage being directly involved with peer-to-peer engagement in investee companies.

### Investment manager engagement policies

The Plan's investment managers are expected to have developed and publicly disclosed an engagement policy. This policy, amongst other things, provides the Trustees with information on how the investment managers engage in dialogue with the companies they invest in and how they exercise voting rights. They also provide details on the investment approach taken by the investment managers when considering relevant factors of the investee companies, such as strategy, financial and non-financial performance and risk, and applicable social, environmental and corporate governance aspects.

Links to each investment manager's engagement policy or suitable alternative is provided in the Appendix.

These policies are publicly available on each investment manager's website.

## **ENGAGEMENT POLICY IMPLEMENTATION STATEMENT (continued)**For the year ended 5 April 2022

The latest available information provided by the investment managers (with mandates that contain public equities or bonds) is as follows:

Engagement	LGIM UK Equity Index	LGIM World (ex-UK) Equity Index and LGIM World (ex-UK) Equity Index - GBP Hdgd	LGIM Active Corporate Bonds - Over 10 Year
Period	01/04/2021- 31/03/2022	01/04/2021- 31/03/2022	01/10/2020-31/09/2021
Engagement definition	Purposeful, targeted government, industry bothe goal of encouraging addressing a market-w	communication with an ody, regulator) on particula g change at an individual vide or system risk (su nformation as part of ongo	entity (e.g. company, ar matters of concern with issuer and/or the goal of ich as climate). Regular ing research should not be
Number of companies engaged with over the year	147	275	Not provided
Number of engagements over the year	244	386	168

Engagement	Schroders Diversified Growth	
Period	01/04/2021-31/03/2022	
Engagement definition	Purposeful, targeted communication with an entity (e.g. company, government, industry body, regulator) on particular matters of concern with the goal of encouraging change at an individual issuer and/or the goal of addressing a market-wide or system risk (such as climate). Regular communication to gain information as part of ongoing research should not be counted as engagement.	
Number of companies engaged with over the year	>600	
Number of engagements	>1000	
over the year		

### **Exercising rights and responsibilities**

The Trustees recognise that different investment managers should not be expected to exercise stewardship in an identical way, or to the same intensity.

The investment managers are expected to disclose annually a general description of their voting behaviour, an explanation of the most significant votes cast and report on the use of proxy voting advisers.

The investment managers publish online the overall voting records of the firm on a regular basis.

The investment managers use proxy advisers for the purposes of providing research, advice or voting recommendations that relate to the exercise of voting rights.

The Trustees do not carry out a detailed review of the votes cast by or on behalf of their investment managers but rely on the requirement for their investment managers to provide a high-level analysis of their voting behaviour.

The Trustees consider the proportion of votes cast, and the proportion of votes against management to be an important (but not the only) consideration of investor behaviour.

## **ENGAGEMENT POLICY IMPLEMENTATION STATEMENT (continued)**For the year ended 5 April 2022

The latest available information provided by the investment managers (for mandates that contain public equities) is as follows:

Voting behaviour	LGIM UK Equity Index	LGIM World (ex-UK) Equity Index and LGIM World (ex-UK) Equity Index - GBP Hdgd	LGIM Active Corporate Bonds - Over 10 Year
Period	01/04/2021-31/03/2022	01/04/2021-31/03/2022	01/10/2020-31/09/2021
Number of meetings eligible to vote at	772	2,931	5
Number of resolutions eligible to vote on	10,813	34,024	6
Proportion of votes cast	99.98%	99.79%	100.00%
Proportion of votes for management	93.07%	78.98%	100.00%
Proportion of votes against management	6.93%	20.10%	0.00%
Proportion of resolutions abstained from voting on	0.00%	0.92%	0.00%

Voting behaviour	Schroders Diversified Growth
Period	01/04/2021-31/03/2022
Number of meetings eligible to vote at	123
Number of resolutions eligible to vote on	1680
Proportion of votes cast	95.77%
Proportion of votes for management	89.52%
Proportion of votes against management	5.42%
Proportion of resolutions abstained from voting on	0.06%

### Trustees' assessment

The Trustees have undertaken a review of each investment manager's engagement policy including their policies in relation to financially material considerations.

The Trustees may also consider reports provided by other external ratings providers.

Where an investment manager has received a relatively low rating from the investment consultant or from other external rating providers, the Trustees may consider whether to engage with the investment manager.

The Trustees have reviewed the investment managers' policies relating to engagement and voting and how they have been implemented and have found them to be acceptable at the current time.

The Trustees recognise that engagement and voting policies, practices and reporting, will continue to evolve over time and are supportive of their investment managers being signatories to the United Nations' Principles for Responsible Investment and the Financial Reporting Council's UK Stewardship Code 2020.

# **ENGAGEMENT POLICY IMPLEMENTATION STATEMENT (continued)**For the year ended 5 April 2022

### **Appendix**

Links to the engagement policies for each of the investment managers can be found here:

Investment manager	Engagement policy (or suitable alternative)
Legal & General Investment	https://www.lgim.com/landg-assets/lgim/ document-
Management	library/capabilities/lgim-engagement-policy.pdf
Schroders	https://www.schroders.com/en/insights/economics/sustainable-
	investment-report-q1-2022/
Insight Investments	https://www.insightinvestment.com/globalassets/documents/responsible-
	investment/stewardship-code/uk-stewardship-code-report-2021.pdf
M&G Investments	https://global.mandg.com/~/media/Files/M/MandG-
	Plc/documents/mandg-investments-policies/15-06-20-MandG-
	Shareholder-Rights-Directive-Engagement-Policy.pdf

Information on the most significant votes for each of the funds containing public equities as at 31 March 2022(latest available) is shown below:

LGIM UK Equity Index	Vote 1	Vote 2	Vote 3
Company name	Informa Plc	The Sage Group Plc	JD Sports Fashion Plc
Date of Vote	2021-06-03	2022-02-03	2021-07-01
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	0.34	0.30	0.18
Summary of the resolution	Resolution 3 - Re-elect Stephen Davidson as Director Resolution 5 - Re-elect Mary McDowell as Director Resolution 7 - Re-elect Helen Owers as Director Resolution 11 - Approve Remuneration Report	Resolution 11 - Re-elect Drummond Hall as Director	
How the fund manager voted	Against Resolutions 3, 5, 7, and 11 (against management recommendation).	Against	Against
Where the fund manager voted against management, did they communicate their intent to the company ahead of the vote	rationale for all votes aga our investee companies	cates its vote instructions inst management. It is our in the three weeks produced to shareholder meeting to	policy not to engage with ior to an AGM as our

### **ENGAGEMENT POLICY IMPLEMENTATION STATEMENT (continued)** For the year ended 5 April 2022

Rationale for the voting decision

The company's prior Remuneration three Policy votes - in 2018, June 2020, and at a General Meeting that was called in December 2020 - each received high levels of dissent, with 35% or more of votes cast against. At the December 2020 meeting, the Policy Remuneration Equity and the Revitalisation Plan (EVP) received over 40% of votes against. The EVP structured to award the CEO restricted shares to a value of 600% of salary. LGIM has noted our concerns with the company's remuneration practices for many years. Due to continued dissatisfaction, again voted against the proposed Policy at the December 2020 meeting. However, despite significant shareholder dissent at the 2018 and 2020 meetings, the company implemented the awards under the plan, a few weeks after the December meetina. Additionally. the Remuneration Committee has adjusted the performance conditions for the FY2018 longterm incentive plan (LTIP) awards while the plan is running, resulting in awards vesting where they would otherwise have lapsed. Due to consistent problems with the implementation of the company's Policy

Remuneration

Diversity: A vote against is applied because of a lack of progress on gender diversity on the board. LGIM expects boards to have at least one-third female representation on the board.

LGIM has а longstanding policy advocating the for separation of the roles of CEO and board chair. These two roles are substantially different, requiring distinct skills and experiences. Since 2015 we have supported shareholder proposals seeking the appointment of independent board chairs, and since 2020 we have voted against all combined board chair/CEO Furthermore, we have published a guide for boards on the separation of the roles of chair and CEO (available on our website), and we have reinforced our position on leadership structures across our stewardship activities - e.g. via individual corporate engagements and director conferences.

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Outcome of the vote	and the most recent events as described above, LGIM has voted against the Chair of the Remuneration Committee for the past three years. Given the company has implemented plans that received significant dissent from shareholders without addressing persistent concerns, LGIM has taken the decision to escalate our vote further to all incumbent Remuneration Committee members, namely Stephen Davidson (Remuneration Committee Chair), Mary McDowell and Helen Owers.  Resolution 3 - 53.4% of shareholders supported	94.4% of shareholders supported the	84.8% of shareholders supported the
	the resolution. Resolution 5 - 80% of shareholders supported the resolution. Resolution 7 - 78.1% of shareholders supported the resolution. Resolution 11 - 38.3% of shareholders supported the	resolution.	resolution.
Implications of the outcome	seek to engage with the company and monitor progress.	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.	engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.
Criteria on which the vote is assessed to be "most significant"	We consider this vote to be significant as LGIM took the rare step of publicly pre-declaring it before the shareholder meeting. Publicly pre-declaring our vote intention is an important tool for our engagement activities. We decide to pre-declare our vote	LGIM views gender diversity as a financially material issue for our clients, with implications for the assets we manage on their behalf.	LGIM considers this vote to be significant as it is in application of an escalation of our vote policy on the topic of the combination of the board chair and CEO (escalation of engagement by vote).

	intention for a number of reasons, including as part of our escalation strategy, where we consider the vote to be contentious, or as part of a specific engagement programme.		
LGIM World (ex-UK)	Vote 1	Vote 2	Vote 3
Equity Index and LGIM World (ex-UK) Equity Index - GBP Hedged			
Company name	Apple Inc.	Microsoft Corporation	Amazon.com, Inc.
Date of Vote	2022-03-04	2021-11-30	2021-05-26
Approximate size of LGIM World (ex-UK) Equity Index fund's holding as at the date of the vote (as % of portfolio)	4.31	4.00	2.55
Approximate size of LGIM World (ex-UK) Equity Index - GBP Hedged fund's holding as at the date of the vote (as % of portfolio)	4.13	4.03	2.49
Summary of the resolution	Resolution 9 - Report on Civil Rights Audit	Elect Director Satya Nadella	Resolution 1a Elect Director Jeffrey P. Bezos
How the fund manager voted	For	Against	Against
Where the fund manager voted against management, did they communicate their intent to the company ahead of the vote	rationale for all votes aga our investee companies engagement is not limited	cates its vote instructions inst management. It is our in the three weeks produced to shareholder meeting to	policy not to engage with ior to an AGM as our opics.
Rationale for the voting decision	Diversity: A vote in favour is applied as LGIM supports proposals related to diversity and inclusion policies as we consider these issues to be a material risk to companies.	LGIM expects companies to separate the roles of Chair and CEO due to risk management and oversight	LGIM has a longstanding policy advocating for the separation of the roles of CEO and board chair. These two roles are substantially different, requiring distinct skills and experiences. Since 2015 we have supported shareholder proposals seeking the appointment of independent board chairs, and since 2020 we are voting against all combined

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Outcome of the vote  Implications of the	53.6% of shareholders supported the resolution.  LGIM will continue to	94.7% of shareholders supported the resolution.  LGIM will continue to	Furthermore, we have published a guide for boards on the separation of the roles of chair and CEO (available on our website), and we have reinforced our position on leadership structures across our stewardship activities — e.g. via individual corporate engagements and director conferences.  95.1% of shareholders supported the resolution.  LGIM will continue to
outcome	engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.	vote against combined Chairs and CEOs and will consider whether vote pre-declaration would be an appropriate escalation tool.	engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.
Criteria on which the vote is assessed to be "most significant"	LGIM views gender diversity as a financially material issue for our clients, with implications for the assets we manage on their behalf.	A vote linked to an LGIM engagement campaign, in line with the Investment Stewardship team's five-year ESG priority engagement themes	LGIM considers this vote to be significant as it is in application of an escalation of our vote policy on the topic of the combination of the board chair and CEO (escalation of engagement by vote).
Schroders Diversified Growth	Vote 1	Vote 2	Vote 3
Company name	BHP Group Plc	Berkshire Hathaway Inc.	Royal Dutch Shell Plc
Date of Vote	2021-10-14	2021-01-05	2021-05-18
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	0.00	0.00	0.38
Summary of the resolution	Approve the Climate Transition Action Plan	S/H resolution: Report on Climate-Related Risks and Opportunities	S/H resolution: Request Shell to Set and Publish Targets for Greenhouse Gas (GHG) Emissions
How the fund manager	Against	For (Against	For (Against
voted	04	Management)	Management)
Where the fund manager voted against management, did they communicate their intent to the company	Often, we vote against management to escalate a failed engagement. This means that our intention will have already been communicated with management. However, in some cases, depending on materiality and size of holding, we do not communicate the vote against management prior to voting. We send an email to each company after voting against a resolution to tell		
ahead of the vote	them how we voted and the rationale behind our decision.		

Rationale for the voting	The company is	The company is being	The company is being
decision	seeking approval of its	asked to publish a	asked to set and publish
	Climate Transition	report on climate-	targets aligned with the
	Action Plan. We	related risks and	goal of Paris Climate
	commend the company	opportunities. We	Agreement. The
	for its net zero ambition	support this proposal as	resolution asks for
	and for publishing a	there is currently limited	short, medium and long
		ı -	,
	detailed transition plan.	information on the steps	term targets on scope
	We also welcome the	the company is taking to	1,2 and 3 emissions.
	opportunity to express	assess, monitor and	We acknowledge
	our views on the	manage climate-related	elements of overlap
	transition plan. While	risks and opportunities,	between this resolution
	recognising that most of	and we would value	and that of the advisory
	the company's	greater transparency on	vote on Company's
	greenhouse gas	this issue.	Climate Transition
	emissions relate to a		Strategy. A vote for this
	"hard-to-abate" sector		resolution is given as
	(steelmaking), we have		whilst we praise the
	decided to vote against		progress made by the
	the plan on the basis		company and the
	that the company's		climate transition
	current emissions		strategy reported, on
	targets relate to only a		climate targets
	very small proportion of		specifically we support
	the company's total		the ambition of this
	emissions, and we feel		resolution with regards
	it could be more		to Paris alignment and
	stretching overall. We		evolving best practice
	also note that the		for the industry in terms
	company's ambition to		of setting ambitious,
	meet net zero relies on		absolute emissions
	(as yet unspecified) use		reduction targets.
	of offsets and the sale /		
	divestment of certain		
	fossil fuel assets. There		
	is therefore a risk that		
	the plan may not		
	translate into its desired		
	real world climate		
	impact.		
Outcome of the vote	TBD	TBD	TBD
Implications of the	A significant vote is defin	ed as a vote against mana	gement which signals we
outcome	· ·	the company's manageme	· ·
		escalation method to an	
	,	e may kickstart start an en	0 0
		er every vote against ma	
		how we voted and our rat	•
Criteria on which the		s against management s	
vote is assessed to be		er, we believe resolutions	
"most significant"		ice. We therefore rank the	
	against management, firstly by management say on climate votes, secondly		
	environmental and social shareholder resolutions, thirdly any shareholder		
	resolutions and finally by	the size of our holding.	
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# ENGAGEMENT POLICY IMPLEMENTATION STATEMENT (continued) For the year ended 5 April 2022

Information on the most significant engagement case studies for LGIM as a company for the funds containing public equities or bonds as at 31 December 2021(latest available) is shown below:

Name of entity engaged BF with	Case Study 1	Case Study 2	
with	)r	McDonalds	Case Study 3 Experian
			•
	Climate Transition	Antimicrobial resistance	Financial Inclusion
Rationale Outling Gr Cr cr ap en for ste me Ac a en wir sig rep in sp to the pla su sit gr Eu ac vo als co pr at 27 (E	Our work with the institutional Investor Group on Climate Change (IIGCC) is a rucial part of our pproach to climate ingagement. IIGCC is a bounding partner and teering committee member of Climate action 100+ (CA100+),	Antimicrobial resistance The overuse of antimicrobials (including antibiotics) in human and veterinary medicine, animal agriculture and aquaculture, as well as discharges from pharmaceutical production facilities, is often associated with an uncontrolled release and disposal of antimicrobial agents. Put simply, antibiotics end up in our water systems, including our clean water, wastewater, rivers and seas.38 This in turn potentially increases the prevalence of antibiotic-resistant bacteria and genes, leading to higher instances of difficult-to-treat infections. In autumn 2021, LGIM worked again with Investor Action on AMR and wrote to the G7 finance ministers, in response to their Statement on Actions to Support Antibiotic Development. The letter highlighted investors' views on AMR as a financial stability risk.  • A member of our team was on the expert committee for the 2021 AMR Benchmark methodology. The benchmark, which was launched in November 2021, evaluates 17 of the world's largest pharmaceutical companies on their progress in the fight against AMR. We	Pay equality and fairness has been a priority for LGIM for several years. We ask all companies to help reduce global poverty by paying at least the living wage, or the real living wage for UK based employees. Income inequality is a material ESG theme for LGIM because we believe there is a real opportunity for companies to help employees feel more valued and lead healthier lives if they are paid fairly. These are important steps to help lift lower-paid employees out of inwork poverty. This should ultimately lead to better health, higher levels of productivity and result in a positive effect on communities. Global credit bureau Experian† (ESG score: 69; +9) has an important role to play as a responsible business for the delivery of greater social and

What the investment manager has done  Outcomes and next steps	We engaged with BP's senior executives on six occasions in 2021 as they develop their climate transition strategy to ensure alignment with Paris goals.  Following constructive engagements with the	participated in a panel discussion on governance and stewardship around AMR.  UN SDG 3 - Good Health & Wellbeing  During 2021, we voted on the issue of AMR. A shareholder proposal was filed at McDonald's† (ESG score: 62; +8) seeking a report on antibiotics and public health costs at the company. We supported the proposal as we believe the proposed study, with its particular focus on systemic implications, will inform shareholders and other stakeholders on the negative implications of sustained use of antibiotics by the company.  The hard work is just beginning. LGIM	LGIM has engaged with the company on several occasions in 2021 and are pleased to see improvements made to its ESG strategy, encompassing new targets, greater reporting disclosure around societal and community investment, and an increasing allocation of capital aligned to transforming financial livelihoods.  The latter includes the roll-out of Experian
	strengthening of BP's climate targets, announced in a press release on 8 February 2022, together with the commitment to become a net-zero company by 2050 – an ambition we expect to be shared across the oil and gas sector as we aim to progress towards a low-carbon economy. More broadly, our detailed research on the EU coal phase-out earlier this year reinforced our view that investors should support utility companies in seeking to dispose of difficult-to-close coal operations, but only where the	be the next global health event and the financial impact could be significant.	their credit score, and Experian Go, which is hoped to enable access for more people. The company also launched the United for Financial Health project as part of its social innovation fund to help educate and drive action for those most vulnerable.
	disposal is to socially responsible, well-		

# **ENGAGEMENT POLICY IMPLEMENTATION STATEMENT (continued)**For the year ended 5 April 2022

capitalised buyers, supported and closely supervised by the state. In our engagement with multinational energy provider RWE's senior management, for example, we have called for the company to investigate such a transfer. We think transfers like this could make the remaining transition focused companies more investable for many of our funds and for the	
our funds and for the market more generally.	

Information on the most significant engagement case studies for the Schroders Diversified Growth Fund containing public equities and bonds as at 31 March 2022(latest available) is shown below:

Schroders Diversified Growth	Case Study 1	Case Study 2	Case Study 3
Name of entity engaged with	Amazon	Bank of America	Ubisoft Entertainment
Topic	Worker's Rights	Climate Data Metrics	Board Gender Diversity
Rationale	n/a	n/a	n/a
What the investment		Asked the bank to	Expect to see improving
manager has done	health and safety	develop interim	trends in percentage of
I manager has done	statistics, beyond	milestones and	women in workforce,
	Amazon's own safety	science-based targets	management and board
	leadership index.	relating to their Paris	in line with company
	readererilp index.	commitment, plus	targets.
		transparency over	ugete.
		methodology.	
		Asked the bank to	
		provide supplementary	
		metrics that would	
		support our analysis of	
		the banking sector - in	
		this case Scope 3	
		Category 15 emissions	
		relating to its financing	
		activities.	
		Asked them to disclose	
		further information on	
		the engagements they	
		are having with highest- risk clients on the	
		climate transition in the	
		banking side of the	
		business e.g. numbers	
		or % engaged, success	
		rates, case studies, and	
		consider setting climate	
		related targets / goals	
		for banking clients.	

Outcomes	and	next	Amazon increased	The company published	Percentage of females
steps			disclosure on their	2030 interim	in the workforce,
			health and safety	operational targets. The	management, top
			statistics. Additionally,	company does not	management all
			the company have	appear to have SBTI	increased from March
			introduced a few	targets or specific	
			comparable safety	targets for high-risk	
			statistics. We would like	sectors, however it	also increased. Marked
			to see more metrics	plans to develop these	as "almost" as we want
			beyond the safety	in the future.	to see sustained
			leadership index to	The company has	improvement.
				committed to disclosing	
			as achieved.	its financed emissions	
				no later than 2023.	
				The company has said	
				that they engage with	
				clients in high-risk	
				sectors on net zero. We	
				would like to see	
				increased detail	
				surrounding this topic	
				before we can class the	
				objective as achieved.	