

ROCC Computers Pension Scheme

Implementation Statement

30 September 2022

Glossary

| | |
|-------------|--|
| ESG | Environmental, Social and Governance |
| Scheme | ROCC Computers Pension Scheme |
| Scheme Year | 1 April 2021 to 31 March 2022 |
| SIP | Statement of Investment Principles |
| UNPRI | United Nations Principles for Responsible Investment |

Introduction

An investment in equities (shares) brings with it an entitlement to vote at general meetings of the company whose shares are held. Some of the Scheme's assets are invested in equities and the Trustees' SIP includes wording relating to the Trustees' voting and engagement policies.

This Implementation Statement provides an assessment of how, and the extent to which, the voting and engagement policies described in the SIP were followed.

In addition, it summarises the voting record of the Scheme's investment manager and provides information on the significant votes cast in respect of the Trustees' equity holdings. Information is also provided on the how the Scheme's investment manager makes use of the services of proxy voting advisers.**relevant Investments**

The Scheme's assets are invested in pooled funds and some of those funds include an allocation to equities. Where equities are held, the investment manager has the entitlement to vote.

At the end of the Scheme Year, the Scheme invested in the FP Mattioli Woods Balanced Fund which included an allocation to equities.

Voting and Engagement Policies in the SIP

The key points in this SIP relating to voting and engagement were:

- The Trustees recognise that they need to take account of financially material considerations over the appropriate time horizon of the investments, including (but not limited to) ESG considerations, including climate change.

- The Trustees leave the extent to which social, environmental (including climate risk/opportunities) and governance are taken into account in investment decisions to the discretion of the underlying managers of the pooled funds in which the Scheme is invested.
- The Trustees take into account ESG issues when considering any new holding recommended (noting that the Trustees could request an alternative recommendation on ESG grounds).
- The Trustees have obtained from the investment manager confirmation of its approach to the stewardship of investments. Accordingly, the Trustees intend to continue to monitor the investment manager's approach (annually) to ensure that it remains aligned with their own.

Assessment of Whether These Policies Were Followed

A review was undertaken in the preparation of this implementation statement and reference made to that produced in October 2021.

The Investment Manager's Voting Record

A summary of the investment manager's voting record in respect of the Scheme's investment in the FP Mattioli Woods Balanced Fund is:

| Investment Manager | Mattioli Woods |
|---------------------------|--------------------------------|
| Period | 31 March 2021 to 31 March 2022 |
| Number of votes | 210 |
| Split of votes: | |
| For | 100% |
| Against | 0% |

Use of Proxy Investment Advisers

We understand that Mattioli Woods are responsible for determining how to vote in respect of the shares held directly in the FP Mattioli Woods Balanced Fund. To assist in this task, they use a specialist engagement company, ISS. This Fund also invests in shares via other investment vehicles managed by a range of third-party fund managers. In each case the third-party fund manager is responsible for voting at shareholder meetings but they in turn may take advice on voting from a broad range of proxy voting advisers.

Mattioli Woods do not invest in direct equities, with most of the votable resolutions being in Investment Trust vehicles, which will have their own voting policy when it comes to underlying holdings. The assessment of shareholder engagement and voting policies forms part of the ESG integration analysis of investments. Where any underlying fund does not have a sufficiently robust policy, this will be a key part of Mattioli Wood's engagement with the underlying managers.

Our fund manager's voting behaviour

We have reviewed the voting behaviour of our fund manager by considering the following:

- broad statistics of their voting record such as the percentage of votes cast for and against the recommendations of boards of directors (i.e. "with management" or "against management")
- the votes they cast in the year to 31 March 2022 on the most contested proposals in eight categories across the UK, the US and Europe

Our key observations are below along with actions we have taken as a result of our review of the fund manager's voting behaviour.

Voting in Significant Votes

Based on information provided by Mattioli Woods, the Trustees have identified that, in respect of the 210 resolutions that Mattioli Woods were eligible to vote on, none were deemed 'significant'. The Trustees consider votes to be more 'significant' if they are closely contested. i.e. close to a 50:50 split for and against. A closely contested vote indicates that shareholders considered the matter to be significant enough that it should not be simply "waved through". In addition, in such a situation, the vote of an individual investment manager is likely to be more important in the context of the overall result.

The voting information provided by Mattioli Woods did not identify any vote that was deemed to be 'significant'.

Description of Voting Behaviour

On the 210 occasions in which Mattioli Woods had rights to cast a vote on our behalf, the voted for the resolution on every occasion.

We are not satisfied with the voting behaviour of Mattioli Woods over the year.

We expect our fund managers to give the votes they cast on our behalf due consideration and to therefore have voted against at least some proposals made by corporate management during the year.

We are in the process of replacing Mattioli Woods and looking to appoint a Fiduciary Manager. The new manager's stewardship credentials formed part of the selection process.



..... Date: 24 Oct 2022

Signed on behalf of the Trustee of the ROCC Computers Pension Scheme