

Engagement Policy Implementation Statement (“EPIS”)

Stanplan F – Brighton College (the “Scheme”)

The purpose of this document is for Entrust Pension Limited, as Trustee of Stanplan F - Brighton College, to demonstrate the actions taken during the Scheme year to achieve certain policies and objectives set out in the Scheme’s Statement of Investment Principles (“SIP”).

The contents of this EPIS includes:

1. How the Trustee’s policies in the Scheme’s SIP covering asset stewardship (including both voting and engagement activity) in relation to the Scheme’s investments have been followed during the year; and
2. How the Trustee has exercised its voting rights or how these rights have been exercised on the Trustee’s behalf, including the use of any proxy voting advisory services and the ‘most significant’ votes cast over the Scheme year.

In preparing this EPIS, the Trustee has used data from its fiduciary investment manager, Aon Investments Limited (AIL).

Our conclusion

Based on the activity undertaken during the year, the Trustee is of the view that the policies set out in the SIP have been implemented effectively.

In our view, most of the Scheme’s material investment managers were able to disclose adequate evidence of voting and engagement activity, and this activity was in line with our expectations.

LGIM and BlackRock provided data in a non-standard template. AIL intends to write to these managers and communicate the Trustee’s expectations of improved disclosure going forwards.

Summary of Our Engagement Action Plan

Not all underlying investment managers were able to provide all the engagement information requested by AIL and AIL will continue to engage with these managers to encourage improvements in their reporting. These issues are set out in the Trustee’s Engagement Action Plan.

How voting and engagement policies have been followed

The Scheme is invested entirely in pooled funds and so the responsibility for voting and engagement is delegated to the Scheme's underlying investment managers.

The Trustee has reviewed the stewardship activity of the material underlying investment managers over the Scheme year and in our view, most of the investment managers were able to disclose adequate evidence of voting and/or engagement activity. More information on the stewardship activity carried out by the Scheme's investment managers is set out in the following sections.

Responsible Investment (RI) policy development

The Trustee's RI policy was created following an exercise to collate the individual views of the Trustee's team with respect to different RI issues. The Trustee reviewed the conclusions from this exercise alongside the features of the Scheme and its investment arrangements to help it formally establish its RI views, beliefs and objectives. This exercise resulted in the establishment of a stand-alone RI policy by the Trustee. Throughout the year, the Trustee ensured the RI policy remained relevant and up to date.

Ongoing monitoring

The Trustee receives in depth portfolio updates from AIL at quarterly Trustee meetings, covering investment performance, portfolio positioning and topical updates, including ESG-related updates.

Each year, usually at one of its quarterly Trustee meetings, the Trustee reviews the annual stewardship report provided by AIL. This sets out detailed voting and engagement commentary for each underlying investment manager within the fiduciary investment portfolio and, alongside this EPIS, allows the Trustee to assess the actions taken by the AIL-appointed investment managers over the year.

Sponsor consultation

The Trustee believes that the views of the sponsor, where applicable, should be aligned to the Scheme's RI policy and objectives. The sponsor is consulted with any amendments to the SIP.

The Scheme's SIP, including the Trustee's stewardship policy, is also publicly available and can be found here: [Statement of Investment Principle Stanplan F – Brighton College - Gateley \(gateleyplc.com\)](#)

What is stewardship?

Stewardship is investors using their influence over current or potential investees/issuers, policy makers, service providers and other stakeholders to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society.

This includes prioritising which ESG issues to focus on, engaging with investees/issuers, and exercising voting rights.

Differing ownership structures means stewardship practices often differ between asset classes.

Source: UN PRI

Trustee's Engagement Action Plan

Based on the work we have done for the EPIS, the Trustee noted the following and will take the outlined steps where appropriate, with AIL's support, over the next 12 months:

1. While Legal and General Investment Management Limited ("LGIM") and BlackRock did provide a comprehensive list on fund level engagements, which we find encouraging, they did not provide detailed engagement examples specific to the fund in which the Scheme is invested, as per the Investment Consulting Sustainability Working Group ("ICSWG") industry standard engagement reporting template. AIL will continue to engage with these managers to encourage improvements in their respective engagement reporting.
2. We will invite our fiduciary manager to a meeting to get a better understanding of how it is monitoring voting practices and engaging with underlying managers on our behalf, and how these help us fulfil our Stewardship policies.
3. The Trustee will look for opportunities to develop ESG monitoring of the underlying investment managers.
4. The Trustee will continue to undertake an annual review of the AIL stewardship report and evaluate how the underlying investment managers' Responsible Investment policies align with those of the Trustee.

What is the Engagement Action Plan?

In preparing the Engagement Policy Implementation Statement, AIL and the Trustee have discovered specific areas where they would like to see improvement over time.

The Engagement Action Plan sets out specific issues that AIL and the Trustee will look to address over the forthcoming year, as well ongoing commitments around ESG monitoring and reporting.

Our fiduciary manager's engagement activity

As set out in the Scheme's SIP, the Trustee invests the Scheme's assets in AIL's fiduciary management platform. Under this arrangement, the implementation of the Scheme's investment strategy is delegated to AIL, acting within parameters set by the Trustee.

The Scheme's assets may be invested in a combination of return-seeking strategies including the Managed Growth Strategy, the Diversified Liquid Credit Strategy and four "Fruition" strategies which contain growth assets and liability matching assets. The strategic allocation to each strategy is determined by the target level of return, and target hedging of interest rates and inflation.

The underlying investment managers within each selected fund are appointed by AIL, based on AIL's best ideas and due diligence processes.

The Trustee delegates the monitoring of ESG integration and stewardship of the underlying managers to AIL. Over the year, AIL held several engagement meetings with the underlying managers in its funds. At these meetings, AIL discussed ESG integration, stewardship, climate, biodiversity and modern slavery with the investment managers, and provided feedback to the managers after these meetings with the aim of improving the standard of ESG integration across its portfolios.

Over the year, AIL also engaged with the wider asset management industry through white papers, working groups, webinars and network events, as well as responding to multiple consultations.

In 2021, AIL committed to achieve net zero emissions by 2050, with a 50% reduction by 2030 for its fully delegated clients' portfolios and defined contribution default strategies (relative to baseline year of 2019).

Aon is also a signatory to the 2020 UK Stewardship Code.

What is fiduciary management?

Fiduciary management is the delegation of some, or all, of the day-to-day investment decisions and implementation to a fiduciary manager. However, the Trustee still retains responsibility for setting the high-level investment strategy.

In fiduciary management arrangements, the Trustee will often delegate monitoring ESG integration and asset stewardship to its fiduciary manager.

Our investment managers' voting activity

Good asset stewardship means being aware and active on voting issues, corporate actions and other responsibilities tied to owning a company's stock. We believe that good stewardship is in the members' best interests to promote best practice and encourage investee companies to access opportunities, manage risk appropriately, and protect shareholders' interests. Understanding and monitoring the stewardship that investment managers practice in relation to the Scheme's investments is an important factor in deciding whether a manager remains the right choice for the Scheme.

Voting rights are attached to listed equity shares, including equities held in multi-asset funds. We expect the Scheme's equity-owning investment managers to responsibly exercise their voting rights.

Voting statistics

The table below shows the voting statistics for each of the Scheme's material funds with voting rights for the year to 30 September 2023. Managers collate voting information on a quarterly basis.

	Number of resolutions eligible to vote on	% of resolutions voted	% of votes against management	% of votes abstained from
LGIM – Multi Factor Equity Fund	11,891	99.9%	21.2%	0.1%
BlackRock – Emerging Markets Equity Fund	30,811	97.0%	11.0%	2.0%

Source: Investment managers.

Use of proxy voting advisers

Many investment managers use proxy voting advisers to help them fulfil their stewardship duties. Proxy voting advisers provide recommendations to institutional investors on how to vote at shareholder meetings on issues such as climate change, executive pay and board composition. They can also provide voting execution, research, record keeping and other services.

Responsible investors dedicate time and resources towards making their own informed decisions, rather than solely relying on their adviser's recommendations. The table below describes how the Scheme's managers use proxy voting advisers.

Manager	Description of use of proxy voting advisers (in manager's own words)
LGIM	LGIM's Investment Stewardship team uses Institutional Shareholder Services' (ISS) 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by LGIM and we do not outsource any part of the strategic decisions. To ensure our proxy provider votes in accordance with our position on ESG, we have put in place a custom voting policy with specific voting instructions. For more details, please refer to the Voting Policies section of this document.
BlackRock	BlackRock's proxy voting process is led by the BlackRock Investment Stewardship team (BIS) - located in seven offices around the world. 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 BIS with input from investment colleagues as required, in each case, in accordance with BlackRock's Global Principles and custom market-specific voting guidelines.

While we subscribe to research from the proxy advisory firms ISS and Glass Lewis, it is just one among many inputs into our vote analysis process, and we do not blindly follow their recommendations on how to vote. We primarily use proxy research firms to synthesise corporate governance information and analysis into a concise, easily reviewable format so that our investment stewardship analysts can readily identify and prioritise those companies where our own additional research and engagement would be beneficial. Other sources of information we use include the company's own reporting (such as the proxy statement and the website), our engagement and voting history with the company, and the views of our active investors, public information and ESG research.

Source: Investment managers.

Why is voting important?

Voting is an essential tool for listed equity investors to communicate their views to a company and input into key business decisions. Resolutions proposed by shareholders increasingly relate to social and environmental issues.

Source: UN PRI

Why use a proxy voting adviser?

Outsourcing voting activities to proxy advisers enables managers that invest in thousands of companies to participate in many more votes than they would without their support.

Significant voting examples

To illustrate the voting activity being carried out on our behalf, we asked the Scheme's material equity managers to provide a selection of what they consider to be the most significant votes in relation to the Scheme's funds. A sample of these significant votes can be found in the appendix.

Our investment managers' engagement activity

Engagement is when an investor communicates with current (or potential) investee companies (or issuers) to improve their ESG practices, sustainability outcomes or public disclosure. Good engagement identifies relevant ESG issues, sets objectives, tracks results, maps escalation strategies and incorporates findings into investment decision-making.

The table below shows some of the engagement activity carried out by the Scheme's material managers. The managers have provided information for the most recent calendar year available. Some of the information provided is at a firm level i.e., is not necessarily specific to the fund invested in by the Scheme.

Funds	Number of engagements		Themes engaged on at a fund-level
	Fund specific	Firm level	
LGIM – Multi Factor Equity Fund	279	1,224	Environment – Climate change, Natural resource use/impact (e.g. water, biodiversity), Social – Human and labour rights (e.g. supply chain rights, community relations), Human capital management (e.g. inclusion & diversity, employee terms, safety), Inequality, Public health. Governance – Board effectiveness - Diversity, Board effectiveness - Other, Remuneration, Reporting (e.g. audit, accounting, sustainability reporting), Strategy/purpose, and others.
BlackRock – Emerging Markets Equity Fund	450	3,886	Environment - Climate Risk Management, Land Use/Deforestation, Biodiversity. Social - Community Relations, Diversity and Inclusion, Health and Safety. Governance - Board Composition and Effectiveness, Business Oversight/Risk Management.
Robeco - Sustainable Development Goals (“SDG”) Credit Income Fund	23	252	Environment - Climate change, Natural resource use/impact (e.g. water, biodiversity). Social - Human and labour rights, Human capital management, Remuneration. Governance - Board effectiveness – Other, Remuneration.
Schroders plc – International Selection Fund (“ISF”) Securitised Credit Fund	Not provided	>2,800	Environment – Waste, Sustainable Development, Collaboration & Community, Environment (Communications). Social - (Community Relations and Culture). Governance - Sustainable Development.
Aegon Asset Management (“Aegon”) - European ABS Fund	132	441	Environment - Climate change, Social - Human and labour rights, Governance - Board effectiveness - Independence or Oversight, Remuneration, Reporting (e.g. audit, accounting, sustainability reporting)
Abrdn - Climate Transition Bond Fund	44	2,484	Strategy, Financial and Reporting – Capital allocation, Reporting (e.g. audit, accounting, sustainability reporting), Financial performance, Strategy/purpose, Risk management (e.g. operational risks, cyber/information security, product risks)
Barings – Short Dated Credit	476	760	Environment - Climate change, Natural resource use/impact. Governance - Board effectiveness - Independence or Oversight, Remuneration Social - Human capital management (e.g. inclusion & diversity, employee terms, safety)

Source: Investment managers.

Data limitations

At the time of writing, the following managers did not provide all the information we requested:

- Schroder Investment Management (“Schroders”) did not provide the engagement information requested for the Scheme’s investment in its Securitised Fund, however it did provide a detailed breakdown of its policy for engaging on securitised products, with some examples of engagement at a firm level. The manager noted that evaluating a securitized product differs from assessing a going-concern corporation. Additionally, the manager highlighted that engagement in terms of, e.g., labour rights, board diversity, and shareholder rights do not apply to its securitized products. Given the nature of the investment mandates within the fund managed by Schroders, the Trustee, supported by AIL, is of the view that this does not require further engagement.
- LGIM and BlackRock did provide fund level engagement information but not in the industry standard template.

The Trustee will work with Aon to engage with the managers to encourage improvements in their reporting.

This report does not include commentary on the Scheme’s investments in cash and gilts because of the limited materiality of stewardship to these asset classes. Furthermore, this report does not cover any additional voluntary contributions (“AVCs”).

Appendix – significant voting examples

In the table below are some significant vote examples provided by the Scheme’s managers. The Trustee considers a significant vote to be one which the relevant investment manager deems significant, based on its own criteria. Investment managers use a wide variety of criteria to determine what they consider a significant vote, some of which are outlined in the examples below.

LGIM – Multi Factor Equity Fund	Company name	Alphabet Inc.
	Date of vote	2 June 2023
	How the manager voted	For (against management recommendation)
	Did the manager communicate its intent to the company ahead of the vote?	LGIM publicly communicates its vote instructions on its website the day after the company meeting, with a rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.
	Summary of the resolution	Approve Recapitalization Plan for all stock to have one vote per share
	Approximate size of fund's holding as at the date of the vote (as % of portfolio)	0.71%
	Outcome of the vote	Fail
	Rationale for the voting decision	Shareholder Resolution - Shareholder rights: A vote in favour is applied as LGIM expects companies to apply a one-share-one-vote standard.
	Implications of the outcome	LGIM will continue to monitor the board's response to the relatively high level of support received for this resolution.
	Criteria on which the vote is considered significant?	High Profile meeting: This shareholder resolution is considered significant due to the relatively high level of support received.
BlackRock – Emerging Markets Equity Fund	Company name	PT Astra Agro Lestari Tbk
	Date of vote	3 April 2023
	How the manager voted	Against
	Did the manager communicate its intent to the company ahead of the vote?	We endeavour to communicate to companies when we intend to vote against management, either before or just after casting votes in advance of the shareholder meeting. We publish our voting guidelines to help clients and companies understand our thinking on key governance matters that are commonly put to a shareholder vote. They are the benchmark against which we assess a company's approach to corporate governance and the items on the agenda to be voted on at the shareholder meeting. We apply our guidelines pragmatically, taking into account a company's unique circumstances where relevant. Our voting decisions reflect our analysis of company disclosures, third party research and, where relevant, insights from recent and past company engagement and our active investment colleagues.
	Summary of the resolution	Elect Directors and Commissioners and Approve Their Remuneration
	Approximate size of fund's holding as at the date of the vote (as % of portfolio)	<i>Not provided</i>
	Outcome of the vote	Pass
	Rationale for the voting decision	Vote against, as shareholders would benefit from greater disclosure/evidence on how the company is mitigating adverse impacts and/or managing related risks.

Implications of the outcome	BlackRock's approach to corporate governance and stewardship is explained in our Global Principles. Our Global Principles describe our philosophy on stewardship, including how we monitor and engage with companies. These high-level principles are the framework for our more detailed, market-specific voting guidelines. We do not see engagement as one conversation. We have ongoing direct dialogue with companies to explain our views and how we evaluate their actions on relevant ESG issues over time. Where we have concerns that are not addressed by these conversations, we may vote against management for their action or inaction. Where concerns are raised either through voting or during engagement, we monitor developments and assess whether the company has addressed our concerns.
Criteria on which the vote is considered significant?	<i>Not provided</i>

Source: Investment managers.