

Implementation Statement, covering the Fund Year from 1 April 2021 to 31 March 2022

The Trustees of the Marubeni UK Pension and Life Assurance Fund (the “Fund”) are required to produce a yearly statement to set out how, and the extent to which, the Trustees have followed the voting and engagement policies in their Statement of Investment Principles (“SIP”) during the Fund Year. This is provided in Section 1 below.

The Statement is also required to include a description of the voting behaviour during the Fund Year by, and on behalf of, trustees (including the most significant votes cast by trustees or on their behalf) and state any use of the services of a proxy voter during that year. This is provided in Section 3 below.

1. Introduction

The voting and engagement policies in the SIP were reviewed and updated during the Fund Year in September 2021 to reflect the expectation that the Fund’s managers have strong stewardship policies and processes, reflecting the principles of the UK Stewardship Code 2020 issued by the Financial Reporting Council, and from time to time we review how these are implemented in practice.

As part of this SIP update, the employer was consulted and confirmed it was comfortable with the changes.

The Trustees have, in their opinion, followed the Fund’s voting and engagement policies during the Fund Year, by continuing to delegate to their investment managers the exercise of rights and engagement activities in relation to investments, as well as seeking to appoint managers that have strong stewardship policies and processes, reflecting the principles of the UK Stewardship Code 2020 issued by the Financial Reporting Council.

2. Voting and engagement

As part of its advice on the selection and ongoing review of the investment managers, the Fund’s investment adviser, LCP, incorporates its assessment of the nature and effectiveness of managers’ approaches to voting and engagement.

In February 2022, the Trustees reviewed the results of LCP’s Responsible Investment Survey in order to understand the extent which Stewardship practices (including voting & engagement) in the industry are evolving. Additionally, the Trustees receive periodic updates on ESG and Stewardship related issues from their investment advisers.

3. Description of voting behaviour during the Fund Year

All of the Trustees’ holdings are within pooled funds and the Trustees have delegated to its investment managers the exercise of voting rights. Therefore, the Trustees are not able to direct how votes are exercised and the Trustees themselves have not used proxy voting services over the Fund Year.

Given the Fund did not invest in any funds that held listed equities over the period, there is no relevant information on managers’ voting process, voting behaviour or information on significant votes to include in this section.

The Trustees have contacted the Fund’s other asset managers that don’t hold listed equities, to ask if any of the assets held by the Fund had voting opportunities over the Fund Year. Commentary provided from these managers is set out in Section 3.1 below.

3.1 Votes in relation to assets other than listed equity

The following comments were provided by the Fund’s asset managers who don’t hold listed equities, but invest in assets that may have had voting opportunities during the Fund Year:

- **BlackRock** has confirmed that the funds invested in over the period; the Sustainable Sterling Short Duration Credit Fund, Institutional Sterling Liquidity Fund, LMF Long Nominal LDI Fund and LMF Long Real LDI Fund, were not eligible for voting data during this period.
- **M&G Total Return Credit Investment Fund:** M&G confirmed that the PLSA template was not applicable for this fund as it only invests in fixed income products. M&G was able to provide details of a number of votes of consent that it deemed as significant over the period. M&G’s stewardship and voting policies are available publicly online.