

Implementation Statement, covering the Fund Year from 1 April 2024 to 31 March 2025 (the “Fund Year”)

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 its 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.

In preparing the Statement, the Trustees have had regard to the [guidance](#) on Reporting on Stewardship and Other Topics through the Statement of Investment Principles and the Implementation Statement, issued by the Department for Work and Pensions (“DWP’s guidance”) in June 2022.

1. Introduction

The voting and engagement policies in the SIP were reviewed and updated during the Fund Year in May 2024. The main changes were to reflect:

- the Fund’s amended ‘de-risked’ strategy, implemented over 2022/23;
- further clarification on the leverage management plan with respect of the Fund’s LDI arrangements;
- the selected priority themes for voting and engagement activities.

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.

2. Voting and engagement

The Trustees have delegated to the investment managers the exercise of rights attaching to investments, including voting rights, 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.

The stewardship priorities selected in the 2022/2023 Fund Year remain in place and are listed below:

- Climate change and biodiversity loss; and
- Corporate governance and business ethics.

The Trustees are conscious that responsible investment, including voting and engagement, is rapidly evolving and therefore expects most managers will have areas where they could improve.

The Trustees primarily rely on their investment consultant, LCP, to provide updates on voting and engagement and wider stewardship and ESG issues, through regular reporting and LCP’s Responsible Investment Survey. We note that given none of the Fund’s investments are in equities, there is limited / no scope for managers to vote on issues at underlying investment companies.

3. Description of voting behaviour during the Fund Year

All of the Trustees’ holdings are within pooled funds and the Trustees have therefore delegated to their investment managers the exercise of voting rights. Therefore, the Trustees are not able to direct how votes are exercised and the Trustees 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's stewardship and voting policies are available publicly online at <https://www.mandg.com/who-we-are/mandg-investments/responsible-investing-at-mandg-investments>.