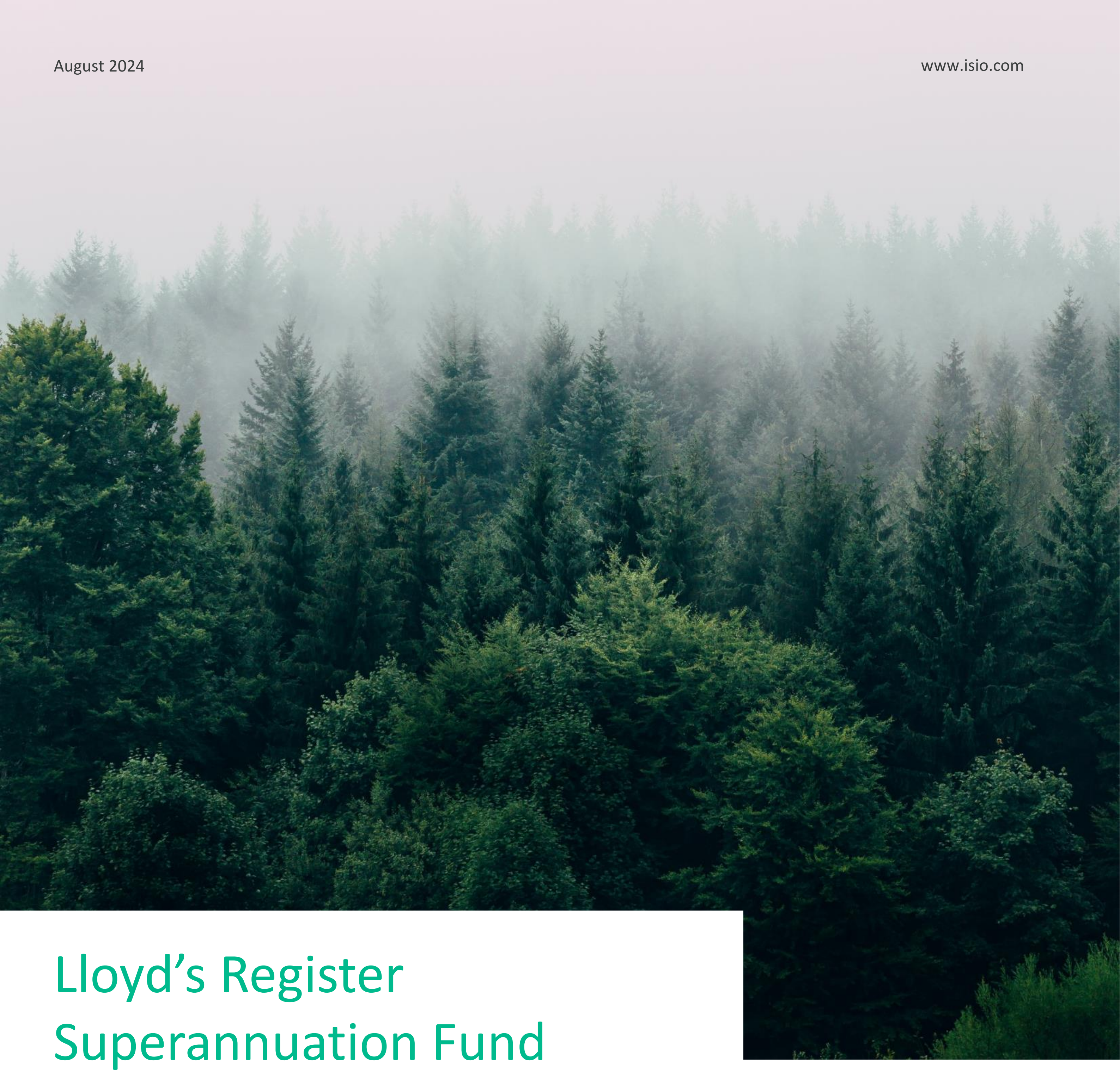

Lloyd's Register Superannuation Fund Association ("the Fund")

August 2024

Background and Implementation Statement

Background

The Department for Work and Pensions ('DWP') is increasing regulation to improve disclosure of financially material risks. This regulatory change recognises Environmental, Social and Governance ('ESG') factors as financially material and pension schemes need to consider how these factors are managed as part of their fiduciary duty. The regulatory changes require that pension schemes detail their policies in their Statement of Investment Principles ('SIP') and demonstrate adherence to these policies in an Implementation Statement.

Implementation Statement

This Implementation Statement is produced to provide evidence that the Fund continues to follow and act on the principles outlined in the Statement of Investment Principles (SIP).

The SIP can be found online at the web address here and changes to the SIP are detailed on the following page.

The Implementation Statement details:

- actions the Fund has taken to manage financially material risks and implement the key policies in its SIP.
- the current policy and approach with regards to ESG and the actions taken with managers on managing ESG risks.
- the extent to which the Fund has followed policies on engagement covering engagement actions with its fund managers and in turn the engagement activity of the fund managers with the companies in the investment mandate.
- voting behaviour covering the reporting year up to 31 March 2024 for and on behalf of the Fund including the most significant votes cast by the Fund or on its behalf.
- the policies in place to ensure the default strategy remains in the best interest of its members.

Summary of key actions undertaken over the Fund reporting year

There were no changes made to the DB's Fund's investments over the reporting year to 31 March 2024.

There were no changes made to the DC Section but the Trustees did initiate a triennial review of the default investment strategy.

Implementation Statement

This report demonstrates that Lloyd's Register Superannuation Fund Association has adhered to its investment principles and its policies for managing financially material consideration including ESG factors and climate change.

Signed [redacted]

Position [redacted]

Date [redacted]

Managing risks and policy actions DB and DC

Risk / Policy	Definition	Policy	Actions and details on changes to policy
DB and DC			
Interest rates and inflation	The risk of mismatch between the value of the Fund assets and present value of liabilities from changes in interest rates and inflation expectations.	To hedge 100% of these risks on a Gilts + 0.5% basis.	DB: There have been no changes to this policy over the reporting year.
Liquidity	Difficulties in raising sufficient cash when required without adversely impacting the fair market value of the investment.	To maintain a sufficient allocation to liquid assets within the DB section so that there is a prudent buffer to pay members benefits as the fall due (including transfer values), and to provide collateral to the LDI manager. Liquidity within the DB section is monitored by the Fund's administrators assessing the level of cash held on a quarterly basis in order to impact cash flow requirements on the policy. Within the DC Section, liquidity risk is managed by typically offering members pooled funds that are readily redeemable in normal circumstances at reasonable prices.	DB: There have been no changes to the policy. The liquidity of the DB assets is monitored on a quarterly basis. DC: There have been no changes to the policy and no liquidity concerns were raised over the reporting period.
Market	Experiencing losses due to factors that affect the overall performance of the financial markets.	To remain appropriately diversified and hedge away any unrewarded risks, where practicable.	DB: The Trustee reduces market risk by diversifying the Fund's holdings across a range of asset classes and investment managers. The Trustee is satisfied that the Fund's assets remain sufficiently diversified to appropriately address market risk. The Trustee evaluates performance of the DB Section in each quarterly period. The Fund's allocations are monitored on a regular basis relative to the Strategic Asset Allocation (set out in the SIP) in the Investment Performance Report.

			There have been no changes to this policy over the reporting year. DC: The Trustee reviews the performance of the DC Section on a quarterly basis.
Credit	Default on payments due as part of a financial security contract.	To diversify this risk by investing in a range of credit markets across different geographies and sectors.	DB/DC: The Trustee continues to review the performance of the Sections on a quarterly basis. There have been no other changes to this policy over the reporting year.
Diversification	The risk that investments are too concentrated in terms of sector, industry, sub-asset class.	This is measured by observing the relative and absolute volatility of the investment options. Within the DC Section, it is also managed through the selection of broad-based funds that show internal diversification, as well as by offering the membership a fund range which provides for reasonable diversification.	DB/DC: There have been no changes to this policy over the reporting year.
Custodian	The risk that the custodian misplaces Fund investments that it is receiving, delivering or safekeeping.	To be measured by assessing the quality of the custodian bank: its ability to settle trades on time and to keep safe custody of assets; and its financial strength (both to stay in business and to pay any claims due to the Fund). The Investment Committee monitors the custodian's activities within the DB Section and discusses the performance of the custodian with the investment managers where appropriate.	DB/DC: There have been no changes to this policy over the reporting year.
Environmental, Social and Governance	Exposure to Environmental, Social and Governance factors, including but not limited to climate change, which can impact the performance of the Fund's investments and member outcomes.	To appoint managers who satisfy the following criteria, unless there is a good reason why the manager does not satisfy each criteria: 1. Responsible Investment ('RI') Policy / Framework 2. Implemented via Investment Process 3. A track record of using engagement and any voting rights to manage ESG factors 4. ESG specific reporting 5. UN PRI Signatory 6. UK Stewardship Code signatory The Trustees monitor the mangers on an ongoing basis.	DB/DC: The Trustee have elected to complete a sustainability integration assessment of the Funds managers biennially. .

Currency	The potential for adverse currency movements to have an impact on the Fund's investments.	To largely invest in GBP share classes where possible to eliminate direct currency risk. Within the DC section this is managed by providing the membership with a number of GBP based investment options and communicating those funds which invest overseas.	DB/DC: There have been no changes to this policy over the reporting year.
Non-financial	Any factor that is not expected to have a financial impact on the Fund's investments.	Non-financial matters are not taken into account in the selection, retention or realisation of investments.	DB/DC: There have been no changes to this policy over the reporting year.
DB only			
Investment	The risk that the Fund's position deteriorates due to the assets underperforming.	Selecting an investment objective that is achievable and is consistent with the Fund's funding basis and the sponsoring company's covenant strength. Investing in a diversified portfolio of assets.	There have been no changes to this policy over the reporting year.
Funding	The extent to which there are insufficient Fund assets available to cover ongoing and future liability cash flows.	Funding risk is considered as part of the investment strategy review and the actuarial valuation. The Trustee will agree an appropriate basis in conjunction with the investment strategy to ensure an appropriate journey plan is agreed to manage funding risk over time.	There have been no changes to this policy over the reporting year. The Trustee reviews the funding position of the DB section on a quarterly basis.
Covenant	The risk that the sponsoring company becomes unable to continue providing the required financial support to the Fund.	When developing the Fund's investment and funding objectives, the Trustee takes account of the strength of the covenant ensuring the level of risk the Fund is exposed to is at an appropriate level for the covenant to support. The Trustee has also managed this risk by ensuring that the Fund has recourse to assets held separately in an escrow account. These assets will be paid into the Fund if the funding level falls below certain triggers at future valuation dates.	There have been no changes to this policy over the reporting year. The Trustee reviews the covenant position of the Sections on a triennial basis in conjunction with the Actuarial Valuation, and more frequently if any significant events occur
DC Only			

Default Design	The default strategy is in the best interest of members.	The default is regularly reviewed to check it matches the risk/reward requirements of the Fund members and preserves the value of capital at retirement.	There have been no changes to the default design over this reporting year however the Trustees initiated a Triennial review of the default investment strategy in Q1 2024.
Alternative lifestyles	Offering members an appropriate selection of alternative lifestyles	With pension freedoms members can choose a number of options at retirement, Funds should look to offer alternative lifestyles to target retirement outcomes. An ESG lifestyle could also be offered.	There have been no changes to the alternative lifestyles over this reporting year. However, these are included in the scope of the investment strategy review.
Self-Select Funds	Offering members an appropriate selection of self select funds.	Members who wish to self select their investments should have a good variety of funds, offering alternative asset classes with rated fund managers. Could also offer an ESG fund to members.	There have been no changes to the self-select range over this reporting year. However, the self-select range is included in the scope of the investment strategy review.

Changes to the SIP

Over the period, there were no changes to the Fund's SIP.

Current ESG policy and approach

ESG as a financially material risk

The SIP describes the Fund's policy with regards to ESG as a financially material risk. The Trustee updated the Fund's ESG policy in the 2022/2023 reporting year, which includes details of monitoring and engaging with the Fund's investment managers regarding the ESG polices.

The Fund's ESG policy can be found on page 5/6 of this document.

The table below outlines the areas which the Fund's investment managers are assessed on when evaluating their ESG policies and engagements. The Trustee intends to review the Fund's ESG policies and engagements periodically to ensure they remain fit for purpose.

Risk Management	1. Integrating ESG factors, including climate change risk, represents an opportunity to increase the effectiveness of the overall risk management of the Fund. 2. ESG factors can be financially material and managing these risks forms part of the fiduciary duty of the Trustee.
Approach / Framework	3. The Trustee should understand how asset managers make ESG decisions and will seek to understand how ESG is integrated by each asset manager. 4. ESG factors are relevant to investment decisions in all asset classes. 5. Managers investing in companies' debt, as well as equity, have a responsibility to engage with management on ESG factors.
Reporting & Monitoring	6. Ongoing monitoring and reporting of how asset managers manage ESG factors is important. 7. ESG factors are dynamic and continually evolving; therefore the Trustee will receive training as required to develop their knowledge. 8. The role of the Fund's asset managers is prevalent in integrating ESG factors; the Trustee will, alongside the investment advisor, monitor ESG in relation to the asset managers' investment decisions.
Voting & Engagement	9. The Trustee will seek to understand each asset managers' approach to voting and engagement when reviewing the asset managers' approach. 10. Engaging is more effective in seeking to initiate change than disinvesting.
Collaboration	11. Asset managers should sign up and comply with common codes and practices such as the UNPRI & Stewardship code. If they do not sign up, they should have a valid reason why. 12. Asset managers should engage with other stakeholders and market participants to encourage best practice on various issues such as board structure, remuneration, sustainability, risk management and debtholder rights.

ESG summary and actions with the investment managers

The Trustee has adopted a biennial ESG monitoring service. Therefore, the following commentary reflects Isio findings from the Fund's 2022 ESG monitoring. The next ESG manager monitoring will take place in 2025.

Manager and Fund	ESG Summary	Actions identified
DB Section		
Alcentra Direct Lending Fund II ("EDL II")	Alcentra have a Responsible Investment Team who reviews the output of the quantitative ESG Scorecard and help integrate ESG into the Funds. ESG metrics are incorporated into Alcentra's quarterly reports and over the previous 12 months they have introduced dedicated ESG reports. As the existing EDL funds are fully invested, any future ESG improvements are most likely to be focused on enhanced engagements and stewardship priorities.	- Alcentra should set fund-level ESG priorities and introduce fund-level ESG policies - Alcentra to introduce engagement / stewardship objectives and milestones for portfolio companies and provide fund-level engagement data. - Alcentra should consider adopting a firm-wide net zero commitment and climate policy.
LGIM Buy and Maintain Credit	LGIM has a well-defined and robust firm wide ESG policy, which is strongly integrated within the due diligence process used to assess the ESG credentials within the Fund. However, there remains a lack of explicit fund-level ESG objectives. At an overall level, and guided by the central stewardship team, LGIM leverages its scale and influence to engage with companies and policymakers globally, with the aim of improving market ESG standards and best practices.	- LGIM to finalise specific ESG / Climate objectives for the Fund, with quantifiable and tangible targets. - LGIM to provide more detail of their plans to support the reduction in its carbon weighted temperature alignment and set specific KPIs. - LGIM to include fund-specific engagement activity and coverage of greenhouse gas ("GHG") emissions data. - LGIM should look to push towards "Impact" attributes and accreditation if practicably viable.

Partners Group PMCS 15 & 18	The Isio ESG rating for Partners Group ('PG') has been downgraded from 'Meets Criteria' to 'Partially Meets Criteria'. While PG have demonstrated growth within their ESG team and practices, they are lagging compared to peers across a number of areas, primarily reporting. PG should consider the proposed actions identified in order to improve their ESG score.	- Partners Group should identify Fund Level ESG targets. - Partners Group to provide a Diversity Report and improve diversity reporting metrics. - Partners Group to adopt engagement targets and include engagement information in quarterly reporting. - Partners Group should report on TFCD Climate Change Metrics and incorporate ESG metrics into quarterly reports.
Schroders Segregated LDI Fund	Schroders integrate ESG consideration in their counterparty selection process and have a well- established method to screen counterparties. Schroders have made some improvements to their reporting capabilities by starting to report sustainability metrics on UK gilts in Q4 2021.	- Schroders to provide ESG scores and metrics for counterparties in clients' reports. - Schroders should produce user-friendly engagement reports.
DC Section		
abrdn Sustainable Index World Equity Fund (LR Adventurous)	The Fund implements a number of ESG layers into its investment process which includes exclusionary screens and quantified ESG targets against the parent index. The fund targets percentage improvements in ESG scores as well as climate related outcomes such as carbon intensity and exposure to green revenue. The strategy benefits from input from ASI's dedicated ESG team of 20 individuals who are responsible for stewardship activities and sustainability driven research.	- abrdn to consider setting fund level social objectives. - abrdn should align the strategy with a temperature pathway. - abrdn could consider setting clear fund level engagement priorities.
Vanguard Emerging Markets Index Fund (LR Adventurous)	There is evidence of an overarching approach to ESG through the Investment Stewardship policy. However, Vanguard have limited scope incorporating ESG considerations into passive strategies.	- Vanguard to implement a structured ESG training programme for investment analysis. - Vanguard to generate metrics to calculate engagement effectiveness. - Vanguard to provide details of engagements and voting data in regular reporting.

BlackRock Market Advantage Fund (LR Adventurous & LR Diversified Growth)	The fund has aligned itself with the Paris Agreement and has set targets such as the 1.5°C temperature target and an annual average of a 7% reduction in carbon emissions intensity score. ESG considerations are also integrated into the security selection process. BlackRock have a publicly available Global Stewardship Policy and a central stewardship team.	- BlackRock to provide evidence of action taken to mitigate ESG risk of assets. - BlackRock to develop a scorecard to use as part of investment process. - BlackRock to create fund level stewardship priorities and demonstrate how engagement aligns with the priorities of the fund. - BlackRock to report ESG metrics in quarterly reports and produce data to satisfy implementation statements.
iShares Index Linked Gilt Index Fund (LR SL iShares Index Linked Gilt Index)	There are no specific policies for this fund however the BlackRock wider firm level policies still apply.	

Engagement

As the Fund invests via fund managers, the managers provided details on their engagement actions including a summary of the engagements by category for the 12-month period to 31 March 2024.

For the DC section, we are reporting on the funds which make up the default strategy and which captures c.87% of the DC Section's assets. Given the SL iShares Index Linked Gilt Index only invests in government bonds, there are no engagement actions to report.

Fund name	Engagement summary	Commentary
DB Section		
Alcentra - Direct Lending Fund II ("EDL II")	Total Engagements: 91 Environmental: 32 Of which relating to Climate Change: 15 Pollution and Waste: 9 Social: 22 Of which relating to Conduct, Culture and Ethics: 6 Human Capital Management: 9 Governance: 6 Of which relating to Board Effectiveness – Diversity: 3 Board Effectiveness – Independence: 1 Strategy, Financial and Reporting: 31 Of which relating to Risk management: 10 Strategy/Purpose: 9	Alcentra defines engagement as the direct communication logged from management meetings, sponsor meetings and diligence reviews on environmental, social and governance matters. The manager engages with portfolio companies on ESG matters to promote their expectations as they believe their stewardship activities directly support their objective of strong, long-term investment returns for clients. An example of significant engagement includes: Motorcycle accessories manufacturer: Alcentra is looking to shift lending from ESG-Linked Loans to Sustainability-Linked Loans (SLLs), as per Loan Market Association (LMA) guidelines. They collaborated with a portfolio company to structure ESG-based key performance indicators (KPI's) for their loan facility, initially focusing on general Corporate Social Responsibility initiatives. After guidance from Alcentra, the company established three substantial, data-driven KPIs. The KPIs, signed off in October 2023, included carrying out an emissions assessment and making a submission to the Science Based Targets initiative (SBTI), linking CEO and C-suite remuneration to ESG criteria, and assessing eco-design practices with the aim of setting future quantitative goals. Alcentra believe the intended objective was fulfilled as their legal counsel was engaged to use the LMA-approved SLL language ensuring compliance with market best-practice.
Partners Group - PMCS 15 and 18	PMCS 15 Total Engagements: 2 Of which relating to Corporate/Strategy: 2 PMCS 18 Total Engagements: 5 Of which relating to Corporate/Strategy: 3 ESG: 2	Partners Group implements their firm wide ESG objectives through their Sustainability and ESG teams. A 'firm-level' example of significant engagements include: Cote Bistro: Partners Group continue to engage with Cote Bistro and their ongoing restructuring process. Performance in recent months is in line with budget, however they are still behind plan. Partners Group were involved in executing a new 5-year plan to further drive value creation activities.

		KinderCare Education: KinderCare Education, the largest for-profit early education provider in the US and part of Partners Group's portfolio, operates via KinderCare, KCE @ Work and Champions. They have undertaken environmental initiatives, such as baseline GHG emissions assessment, and energy efficiency improvements, which have cut CO2 emissions and saved over USD 1.8 million. Socially, they've established a living wage programme, employee resource groups, and conducted employee surveys; their efforts led to them achieving the WELL Health-Safety Rating and exceeding teacher retention targets by 20%. Governance-wise, they've assigned ESG responsibilities at board, executive and leadership levels, carried out ESG materiality assessments, and launched an ESG Steering Committee. They also carry out annual risk assessments and successfully executed the 2022 audit plan.
LGIM Buy and Maintain Bond Mandate	Total Engagements: 587 Environmental: 174 Of which relating to Climate Change: 138 Natural Resource Use/Impact: 27 Social: 110 Of which relating to Human Capital Management: 37 Public Health: 24 Governance: 216 Of which relating to Renumeration: 85 Board Effectiveness – Independence: 38 Strategy, Financial and Reporting: 84 Of which relating to Strategy/Purpose: 26 Financial Performance: 24	LGIM have considered engagement on a fund-by-fund basis this year and also actively approach ESG at a firm level. Examples of significant engagements include: United Utilities: LGIM engaged with United Utilities to address the broader environmental and financial challenges affecting the water sector, such as significant pollution contributions. Members of LGIM's investment stewardship and investment teams have been working on advanced policies and have joined a cooperative working group led by the Investor Forum focussing on short-, medium- and long-term term challenges linked with the UK's water infrastructure at the company, enhancing the focus on broader environmental and financial factors. The results of their engagements will set the expectations for the sector, striving for solutions and improvements with industry stakeholders. The water sector in England and Wales faces significant environmental and governance challenges. As an investor, they are collaborating with key stakeholders to make the global water system more robust. The detailed discussion with United Utilities offered the investment and stewardship teams an understanding of the sector's challenges and their resolution plans. They plan to maintain this dialogue to monitor their actions in the future.
Schroders - Segregated LDI Fund	Over 30 meetings with public bodies/ market participants related to the LDI market.	Over the past year, Schroders' key focus on engagements has been on Climate Change. Schroders believe that banks having financial relations with the fossil fuel industry are at considerable financial, regulatory, and reputational risk due to the shift towards a low-carbon economy. This leads Schroders to put particular emphasis on climate risk, oversight, and alignment when interacting with these banks and other market participants.

		Schroders also use engagement to discuss with banks how they plan to realign their investments or loans towards fast-growing technologies in the transition towards net zero emissions as these technologies will require increased financial support. They believe it's crucial that banks move away from activities emitting high levels of carbon dioxide, which will face extreme challenges. Schroders also use active engagements on industry initiatives and regulation within the LDI sphere to represent views of clients to key public bodies and effectively deliver better outcomes for clients. An example of a significant engagement is: Credit Suisse: Following continued engagement and monitoring of Credit Suisse governance and future stability, Schroders judged Credit Suisse to no longer be a suitable counterparty for swap exposures. In Q3 2022, Schroders began to reduce all LDI exposure with Credit Suisse and, by Q1 2023, Schroders had removed all LDI exposure to Credit Suisse by novating 200+ swaps across clients' portfolios from Credit Suisse at zero cost to the clients.
DC Section – Default Funds		
abrdn Sustainable Index World Equity Fund (LR Adventurous)	Total engagements: 399 Number of entities engaged: 195 Environmental: 129 Social: 92 Governance: 144 Other: 180	Abrdn provided a firmwide policy document which sets out their engagement priorities. These are environmental responsibility, employee relations, human rights and international operations and business ethics. Abrdn Engagement Policy Engagement example (Social – Public Health): Abrdn engaged with **Verizon Communications Inc**, a U.S. telecommunications company. They face social dismay as Wall Street Journal (WSJ) published an article stating that Verizon's lead cable across the US was from their predecessor, Bell Systems from the late 1800s to the 1960s. Abrdn expressed how WSJ's social and environmental allegations could damage the reputation of Verizon. Following the discussions with abrdn, Verizon displayed independent audit results and testing done by the US Environmental Protection Agency which concluded the lead levels are no higher than naturally occurring lead levels, posing no heighted risk to human health. Abrdn's engagement with Verizon is set to offer financial, environmental, and societal benefits. It increased abrdn's investment security because of Verizon's solid procedures and resilience. Their effort to mitigate legacy lead cable exposure is consistent with abrdn's sustainability objectives. Abrdn have pushed Verizon to provide a public map of probable lead cable locations, and will continue to communicate with them to monitor their reactions to complaints and potential dangers.

Vanguard Emerging Markets Index Fund (LR Adventurous)	At the time of writing Vanguard were unable to provide the specific fund level details of engagement for this fund.	Vanguard’s investment stewardship principles cover 4 distinct topics; board composition and effectiveness, oversight of strategy and risk, executive compensation and shareholder rights. Vanguard Q1 2024 Engagement Report Engagement example (Board oversight of strategy and risk): Vanguard engaged with **Hyundai Motor Co.**, a multinational South Korean automotive manufacturer. Hyundai had been linked to supply chain issues, with suspected child labour usage by their US suppliers. During their internal investigation, Hyundai found no evidence of breaches of labour rights. Hyundai proceeded to introduce stricter workforce standards and cut ties with third-party agencies found to be supplying deceptive documentation. Hyundai planned to bolster their risk management, focusing particularly on human rights issues. They acknowledged difficulties in monitoring beyond first-tier suppliers, but intend to extend supplier inspections at both local and global levels. These efforts will be managed by Hyundai's new procurement department and supported by an anonymous whistleblowing system. Hyundai has addressed key allegations and now aim to strengthen supply chain risk management. To ensure transparency, Vanguard urge Hyundai to improve disclosures regarding their planned actions and their impacts, emphasising the role of independent directors in addressing material risks. Vanguard plan to continue monitoring Hyundai's progress and hope to engage with independent directors.
BlackRock Market Advantage Fund (LR Adventurous & LR Diversified Growth)	Total engagements: 1.042 Number of entities engaged: 669 Environmental: 379 Social: 447 Governance: 986 Other: 0	BlackRock provided a firmwide policy document which sets out their engagement priorities. These are board quality and effectiveness, strategy, purpose and financial resilience, incentives aligned with financial value creation, climate and natural capital and company impacts on people. BlackRock Engagement Priorities Summary Engagement example (Environmental): BlackRock engaged with **ASM International NV (ASMI)**, a major supplier of water processing equipment to semiconductor manufacturers in Netherlands. They face material water-related risks given that its water withdrawal operations are in regions exposed to high water stress. BlackRock discussed with ASMI their approach to managing natural capital-related risks and their efforts to re-use water. The company's growing demand for its products has led to increased water use, making this more significant. When analysing the physical risks within the TCFD framework, the company recognised water risk as one of the five most "relevant hazards". BlackRock acknowledges the company's disclosure efforts and welcomes continuous engagement to better understand its water management method for maintaining operational efficiency in high-water stress areas.

Voting (for equity/multi asset funds only)

The Trustee has acknowledged responsibility for the voting policies that are implemented by the Fund's investment managers on their behalf.

There were no voting rights attached to the DB Fund's investment over the 12-month period to 31 March 2024. The majority of the assets are credit based, where there are no voting rights attached.

For the DC section, we are reporting on the funds which make up the default strategy and which captures c.87% of the DC Section's assets. Given the SL iShares Index Linked Gilt Index fund does not have any equity investments, there are no voting actions to report.

As the Fund invests in pooled funds managed by various fund managers, where applicable each manager has provided details on their voting actions, including a summary of the activity covering the reporting year up to 31 March 2024. The managers were also asked for examples of any significant votes. The Trustee has adopted the managers definition of significant votes.

Fund name	Voting summary	Examples of most significant votes	Commentary
DC Section			
abrdn Sustainable Index World Equity Fund (LR Adventurous)	Votable Proposals: 5,081 Proposals Voted: 4,532 For 'management' votes: 4,177 Against 'management' votes: 326 Abstain votes: 29 Withhold votes: n/a Non-proxy agent votes: n/a Proxy agent votes: n/a Use of proxy voter: Yes (ISS's ProxyExchange)	**SSE Plc.** • *Date of vote:* 20 July 2023 • *Reasoning for significant vote:* Abrdn see the vote for reporting on the Climate Transition Plan as significant as they believe votes on environmental issues are important. • *Approx. holding size:* 0.13% • *Summary of resolution:* Reporting on Climate Transition Plan • *Manager vote:* Against management (abstain) • *Vote against management, was intent communicated ahead of the vote:* abrdn do not record instances where they've outlined voting intent beforehand. abrdn may not always be able to communicate the vote due to the high frequency of AGMs. • *Voting rationale:* Abrdn abstained from voting for	Abrdn's company votes and engagement align with their stewardship policy. Their process of using proxy votes and information on voting and engagement policies can be found in their annual stewardship report. Abrdn Stewardship Report

		this resolution due to concerns about the impact on climate votes. Abrdn believe this approach could marginalise climate considerations in overall strategy and dilute board accountability. Abrdn view engagement and conventional resolution voting, particularly with high-emitting companies and climate underperformers, as the best route to promoting climate disclosure. • *Outcome of vote:* n/a • *Next steps:* n/a	
Vanguard Emerging Markets Index (LR Adventurous)	Votable Proposals: 25,497 Proposals Voted: 25,184 For 'management' votes: 22,995 Against 'management' votes: 2,189 Abstain votes: 385 Withhold votes: n/a Non-proxy agent votes: n/a Proxy agent votes: n/a Use of proxy voter: Yes (ISS's ProxyExchange)	**Al Rahji Bank** • *Date of vote :* 08 Nov 2023 • *Reasoning for significant vote :* n/a • *Approx. holding size :* n/a • *Summary of resolution :* Elect members of audit committee and approve its responsibilities, work procedures, and remuneration of its members • *Manager vote :* Against • *Vote against management, was intent communicated ahead of the vote :* n/a • *Voting rationale :* Support not warranted • *Outcome of vote :* n/a • *Next steps :* n/a	For further information on Vanguard's stewardship including their related reports and policies, please click here. Vanguard's Engagement Policy
BlackRock Market Advantage Fund (LR Adventurous & LR Diversified Growth)	Votable Proposals: 16,064 Proposals Voted: 15,047 For 'management' votes: 13,882 Against 'management' votes: 1,165 Abstain votes: 272 Withhold votes: n/a	**Techtronic Industries Co. Ltd.** • *Date of vote :* 12 May 2023 • *Reasoning for significant vote :* BlackRock looks to boards to establish robust and effective corporate governance practices. The board nomination process is key to ensuring the company nominates non-executive directors with relevant skills and experience who can bring	Through BlackRock's internal policies, they ensure their vote aligns with their stewardship policy. BlackRock Investment Stewardship Global Principles For more information on BlackRock's stewardship, please refer to the following webpage which contains more detail (including their voting and engagement policies) here.

	Non-proxy agent votes: n/a Proxy agent votes: n/a Use of proxy voter: Yes (ISS's ProxyExchange)	independent views as well as ensure objectivity in the decision-making of the board and their ability to oversee management. • *Approx. holding size :* n/a • *Summary of resolution :* Elect Horst Julius Pudwill as Director • *Manager vote :* Against management • *Vote against management, was intent communicated ahead of the vote :* BlackRock do not disclose vote intentions in advance of shareholder meetings as they do not want the vote to influence other investors. • *Voting rationale :* Blackrock did not support the election of Horst Julius Pudwill as Director as he also chairs the Nomination Committee, which BlackRock believe should be chaired by an independent director to ensure objectivity, transparency and independence in the board recruiting process. • *Outcome of vote :* Pass • *Next steps :* BlackRock continues to engage with Techtronic Industries as they believe they would benefit from enhancing their board nomination procedures to support an effective board which takes into consideration the interests of all shareholders and supports the company in delivering durable, long-term financial value creation.

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