

Engagement Policy Implementation Statement

Date: 29 March 2021

Prepared for: The Trustee of the Hilger Analytical Limited Retirement Benefits Scheme

Prepared by: PSGS

Background to new disclosure requirements

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New regulations that apply from 1 October 2020 have set out the following requirements for trustees of defined benefit pension scheme regarding the production of an Engagement Policy Implementation Statement ("EPIS"):

- The EPIS must set out information on how the stewardship policy within the statement of investment principles ("SIP") has been implemented in practice.
- Trustees must publish their EPIS online (by 1 October 2021) and in the Trustee's annual report and accounts where they are produced after 1 October 2020

Purpose and data

This document sets out the proposed content for the EPIS for the Scheme for the year ending 5 April 2021. The EPIS is expected to be included in the Scheme's annual report and accounts.

Requirements for the EPIS for a Defined Benefit ("DB") scheme

This section highlights the key requirements:

Items	Covered in the EPIS?
The EPIS must set out the extent to which the Trustee has <ul style="list-style-type: none">▪ Exercised their rights, including voting rights, attaching to the investments, and▪ Undertaken engagement activities in respect of the investments	Not explicitly applicable to the Scheme
The EPIS must describe the voting behaviour by, or on behalf of, the Trustee including the most significant votes cast during the year and state any use of the service of a proxy voter.	Not explicitly applicable to the Scheme

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The Trustee recognise that they have a responsibility to be stewards of the Scheme beneficiaries' capital and believe that Aviva should use their influence and purchasing power where possible to ensure that ESG factors (including climate change) are appropriately considered by underlying investment managers and financial counterparties.

However, the Trustee recognise that they cannot directly influence the ESG integration nor stewardship policies and practices of Aviva and, given the nature of the Scheme's arrangements, do not have a formal policy on stewardship matters. Instead, the Trustee has delegated the responsibility for these matters to the insurance company from whom the Trustee has purchased Annuity Policies and who may from time to time report on their current and future actions in these areas.

C Teagle
HR Trustees Ltd Chair of Trustees
September 2021