

**HARLAN UK LIMITED OCCUPATIONAL PENSION SCHEME
ANNUAL REPORT FOR THE YEAR ENDED 31 AUGUST 2020**

APPENDICES – IMPLEMENTATION STATEMENT

IMPLEMENTATION STATEMENT FOR THE YEAR ENDED 31 AUGUST 2020

In endeavouring to invest in the best financial interests of the beneficiaries, the Trustees have elected to invest in pooled funds and cannot therefore directly influence the environmental, social, and governance policies and practices of the companies in which the pooled funds invest. The Trustees exclude non-financial matters in the selection, retention and realisation of investments. The Trustees have no formal policy on either Environmental, Social and Governance (ESG) or delegation of voting rights. Instead, they have delegated the responsibility for these matters to their investment manager. The manager reports quarterly on ESG matters, including their voting activity, although not always at the level of the specific funds held. The only investment where voting rights can be applicable for this Scheme is for any equity-based sub funds used within a diversified fund. The bonds held within the bond fund used do not generally involve voting rights. There have been no changes to the Trustees' policies, nor any departures from their policies, during the year.

As the Trustees use pooled funds, their asset manager is not incentivised to align their investment strategy and decisions with the Trustees' policies, nor are they incentivised to make decisions based on assessments about medium to long-term performance of an issuer of debt or equity, nor to engage with those issuers in order to improve their performance. However, the manager may make such decisions and/or engage of their own accord. As the Trustees use pooled funds, there is no targeted portfolio turnover or turnover range. As the Trustees use pooled funds, they do not need to have an engagement policy in relation to monitoring the capital structure of companies they invest in, or any associated potential conflicts of interest.

For and of behalf of the Trustee, Harlan UK Pension Scheme Trustees Limited

Date : ...23rd March 2021.....