

**THE BARRY WEHMILLER INTERNATIONAL RETIREMENT
BENEFITS SCHEME**

IMPLEMENTATION STATEMENT

YEAR ENDED 30 SEPTEMBER 2021

The Trustee confirms that a new SIP was produced in September 2019 to cover:

- the **Trustee's** policy on financially material considerations, including how those considerations are taken into account in the selection, retention and realisation of investments
- the extent (if at all) that non-financial matters are taken into account in the selection, retention and realisation of investments; and
- the **Trustee's** stewardship activities (for example, how they exercise voting rights and what engagement activities they undertake).
- the expanded range of persons to be consulted and matters to be consulted upon when the Trustee and its agents undertake stewardship activities;
- the **Trustee's** policy on how it arranges matters with the asset managers it uses, either setting out their position on key matters or explaining the reasons why such detail is absent.

The Trustee is now required to produce an implementation statement which:

- sets out how, and the extent to which, the stewardship policy in the new SIP has been followed during the year reported upon
- describes the voting behaviour by the Trustee (or on their behalf by asset managers / custodians) during that year, including the most significant votes cast
- states whether there has been any use of the services of a proxy voter during that year.

The Trustee confirms that the stewardship policy in the SIP has been followed. ESG matters are not taken into consideration in the selection, retention and realisation of investments as the Scheme is in the buy-in phase of winding up and has no say in the investments backing the annuity policy. The investments held do not include underlying voting rights and therefore the Trustee cannot report on voting behaviour.