

Jewish Care Pension Scheme

Implementation Statement

This Implementation Statement has been prepared by the Trustee of the Jewish Care Pension Scheme (“the Scheme”) to set out the following information over the year to 31 March 2022:

- How the Trustee’s policies on exercising rights (including voting rights) and engagement activities have been followed over the year.
- The voting activity undertaken by the Scheme’s investment managers on behalf of the Trustee over the year, including information regarding the most significant votes.

How voting and engagement policies have been followed

The Scheme invests entirely in pooled funds and, as such, delegates responsibility for carrying out voting and engagement activities to the Scheme’s fund managers. The Trustee cannot usually directly influence the managers’ policies on the exercise of investment rights where the Trustee holds assets in pooled funds. This is due to the pooled nature of these investments.

The Trustee reviewed the fund managers’ strategies and processes for exercising rights and conducting engagement activities as part of the preparation of this annual Implementation Statement. Having reviewed the above in accordance with their policies, the Trustee is comfortable that the actions of the fund managers are in alignment with the Plan’s stewardship policies. However, they will engage with the investment managers to the extent that any issues or questions are identified in future.

The Trustee expects all investment managers to have a conflict of interest policy in relation to their engagement and ongoing operations. In doing so the Trustee believes they have managed the potential for conflicts of interest in the appointment of the investment manager and conflicts of interest between the Trustee/investment manager and the investee companies.

More generally, the Trustee believes that ESG factors are financially material – that is, they have the potential to impact the value of the investments from time to time. The Trustee considers it to be part of their managers’ roles to assess and monitor how the companies in which they are investing are managing developments in ESG-related issues, and in particular climate risk, across the relevant parts of the capital structure. The Trustee recognises that this will depend on the assets classes being managed, along with the mandate that they have provided the manager.

Additional information on the voting and engagement activities carried out for the Plan’s investments are provided on the following pages.

Data limitations

Where information is not included in this statement, it has been requested but has not been provided in a useable format (or at all) by the investment manager. The Trustee’s investment consultants are in discussion with the managers around how this data can be improved for future statements.

**Prepared by the Trustee of the Jewish Care Pension Scheme
July 2022**

Voting Data

Voting only applies to funds that hold equities. The Scheme's equity investments are all held in a pooled fund and as such the investment manager for the fund votes on behalf of the Trustee.

The Scheme's equity investments are managed by State Street Global Advisors ("State Street"). The table below provides a summary of the voting activity undertaken by State Street over the year to 31 March 2022.

Manager	State Street
Fund name	All World ESG Screened Index Equity Sub-Fund
Structure	Pooled
Ability to influence voting behaviour of manager	The pooled fund structure means that there is limited scope for the Trustee to influence the manager's voting behaviour.
Number of company meetings the manager was eligible to vote at over the year	5,917
Number of resolutions the manager was eligible to vote on over the year	59,527
% of resolutions the manager voted on	99.0%
% of resolutions the manager abstained from	1.8%
% of resolutions voted <i>with</i> management	87.4%
% of resolutions voted <i>against</i> management	12.6%
% of resolutions voted <i>contrary to the recommendation of the proxy advisor</i>	6.9%
Proxy voting advisor	ISS

Some voting percentages quoted above may not sum to 100%. This is due to classification of votes and abstentions both internally and across different jurisdictions.

There are no voting rights attached to the other assets held by the Scheme with Insight Investment Management ("Insight"). Therefore, no voting information is shown for these assets in the table above or in the significant votes section below.

Significant votes

The Trustee has delegated to the investment manager to define what a “significant vote” is. A summary of the data they have provided is set out below. State Street consider the following topics to be most significant when it comes to their voting policies and therefore classify them as “significant votes”:

- All votes on environmental related shareholder proposals.
- All votes on compensation proposals where they voted against the company management’s recommendation.
- All votes against the re-election of board members due to: poor ESG performance of their companies; poor compliance with the local corporate governance score of their companies; and, due to the lack of gender diversity on board.

State Street Global Advisors, All World ESG Screened Index Equity Sub-Fund

State Street provided a list of what they believed to be the most significant votes over the year. We have chosen the below three examples to demonstrate the range of issues on which the manager voted during the year.

	Vote 1	Vote 2	Vote 3
Company name	Apple Inc.	Facebook Inc.	Exxon Mobil Corporation
Date of vote	4 March 2022	26 May 2021	26 May 2021
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	4.21%	1.30%	0.42%
Summary of the resolution	Ratify Named Executive Officers' Compensation	Shareholder led proposal to require Environmental/Social Issue Qualifications for Director Nominees	Improve Climate Change reporting
How the manager voted	Against the resolution (<i>against</i> management)	Against the resolution (<i>with</i> management)	For the resolution (<i>with</i> management)
If the vote was against management, did the manager communicate their intent to the company ahead of the vote?	No	Note applicable – voted with management	Note applicable – voted with management
Rationale for the voting decision	SSGA has concerns with the proposed remuneration structure for senior executives at the company.	The manager has concerns with the terms of the proposal.	SSGA supports the proposal as the company's disclosure and/or practices related to climate change can be improved.
Outcome of the vote	Pass (64% for)	Fail (96% against)	Pass (64% for)
Implications of the outcome	State Street will contact the company to explain their voting rationale and conduct further engagement.		
Criteria on which the vote is considered “significant”	Compensation-related resolution	Environmental/Social resolution	Environmental resolution

Fund level engagement

The investment managers may engage with their investee companies on behalf of the Trustee. Whilst the Scheme's credit holdings do not attach any voting rights, other engagement activities are still possible and the Trustee focuses on how their managers' investment processes are aligned with the Scheme's ESG policies.

The table below provides a summary of the engagement activity undertaken by State Street and Insight during the year.

Manager	State Street	Insight		
Fund name	All World ESG Screened Index Equity Sub-Fund	High Grade ABS Fund Liquid ABS Fund	Liquidity Fund	Partially Funded Gilt Funds
Does the manager perform engagement on behalf of the holdings of the fund	Yes	Yes	No	No
Has the manager engaged with companies to influence them in relation to ESG factors in the year?	Yes	Yes	Yes	Yes
Number of engagements undertaken on behalf of the holdings in this fund in the year	Information not provided	c.50 across Insight's ABS team	n/a	n/a
Number of engagements undertaken at a firm level in the year	938		861	
Examples of engagements undertaken with holdings in the fund	<p><i>No explicit fund level engagements were disclosed. The following engagements were at a firm level.</i></p> <p>Box, Inc.: encouraged stronger governance practices and culture of regular shareholder engagement.</p> <p>CRH Plc: urged the company to bring racial and ethnic diversity to its board.</p> <p>Mizuho Financial Group, Inc.: engaged with members of the company's board to discuss setting climate-related targets and improving disclosure efforts.</p>	<p>CVC - Cordatus: engaged on governance concerns and ESG constraints resulting in tighter investment restrictions.</p> <p>Together Financial Services: conducted one-to-one meeting to discuss areas of concern such as the provision of information in areas such as climate risk and carbon footprint.</p> <p>Pepper: identified environmental risk management as an area of weakness, raising concerns in discussions with the company.</p>	n/a	n/a