

Implementation Statement – Jewish Care Pension Scheme

Purpose of this 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 2024:

- 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 fund managers on behalf of the Trustee over the year, including information regarding the most significant votes.

Stewardship policy

At this time, the Trustee has not set stewardship priorities / themes for the Scheme but will be considering the extent to which it wishes to do this in due course, in line with other Scheme risks.

How voting and engagement/stewardship 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. State Street, the Scheme’s equity manager, does now offer the ability for pension scheme investors to choose a third party voting policy from a certain range – at present the Trustee has not chosen to do this but may consider this in the future.

The Trustee requires that its fund managers take into account ESG considerations by engaging with companies and by exercising voting rights. However, the exercise of rights and engagement activities should be consistent with, and proportionate to, the rest of the investment process. The Trustee will also consider the fund managers’ policies on stewardship and engagement when selecting and reviewing fund managers.

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 (and the information in this Statement) in accordance with its policies, the Trustee is comfortable that the actions of the fund managers are in alignment with the Scheme’s stewardship policies. However, the Trustee will engage with the investment managers to the extent that any issues or questions are identified in future. There were no changes in the fund managers the Scheme employed over the year.

The Trustee expects all its fund managers to have a conflict of interest policy in relation to their engagement and ongoing operations. In doing so the Trustee believes that it has managed the potential for conflicts of interest in the appointment of the fund managers and conflicts of interest between the Trustee/fund manager and the investee companies. Additional information on the voting and engagement activities carried out for the Scheme’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 fund manager. The Trustee’s investment consultants are in discussion with the fund manager on how this data can be improved for future statements.

**Prepared by the Trustee of the Jewish Care Pension Scheme
August 2024**

Voting Data

This section provides a summary of the voting activity undertaken by the fund managers within the Scheme's Growth Portfolio on behalf of the Trustee over the year to **31 March 2024**. The **assets held with Insight Investment Management** have no voting rights attached to them.

Manager	State Street
Fund name	All World Screened Index Equity Sub-Fund
Structure	Pooled
Ability to influence voting behaviour of fund manager	The pooled fund structure means that there is limited scope for the Trustee to influence the fund manager's voting behaviour.
No. of eligible meetings	6,675
No. of eligible votes	66,827
% of resolutions voted	95.2%
% of resolutions abstained	1.1%
% of resolutions voted with management ¹	84.5%
% of resolutions voted against management ¹	15.5%
Proxy voting advisor employed ¹	ISS
% of resolutions voted against proxy voter recommendation	7.1%

SSGA contract Institutional Shareholder Services' (ISS) to administer proxy voting, assist in applying SSGA's voting guidelines, provide research and analysis relating to general corporate governance issues and specific proxy items, and provide proxy voting guidelines in limited circumstances. SSGA also has access to Glass Lewis and region-specific meeting analysis provided by the Institutional Voting Information Service. All final voting decisions are based on their proxy voting policies and in-house operational guidelines.

¹ As a percentage of the total number of resolutions voted on

Significant votes

The change in Investment and Disclosure Regulations that came into force from October 2020 requires information on significant votes carried out on behalf of the Trustee over the year to be set out. The guidance does not currently define what constitutes a “significant” vote. However, further guidance states that a significant vote is likely to be one that is linked to one or more of a scheme’s stewardship priorities / themes.

At this time, the Trustee has not set stewardship priorities / themes for the Scheme, but will be considering the extent to which it wishes to do this in due course, in line with other Scheme risks. Therefore, for this Implementation Statement, the Trustee has asked the fund managers to determine what they believe to be a “significant vote”. The Trustee has not communicated voting preferences to their fund managers over the period, as the Trustee is yet to develop a specific voting policy. In future, the Trustee will consider the most significant votes in conjunction with any agreed stewardship priorities / themes.

State Street have provided a selection of votes which they believe to be significant. 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.

In the absence of agreed stewardship priorities / themes, the Trustee has selected 4 votes from their equity manager that cover a range of themes to represent what it considers the most significant votes cast on behalf of the Scheme. To represent the most significant votes, the votes of the largest holdings relating to each topic are shown below.

There are no voting rights attached to funds held with **Insight Investment Management**.

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

	Vote 1	Vote 2	Vote 3	Vote 4
Company name	Microsoft Corporation	Amazon.com, Inc.	Meta Platforms, Inc.	Alphabet Inc.
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	4.53%	2.35%	1.56%	1.30%
Summary of the resolution	Report on climate Risk in Retirement Plan Options	Advisory Vote to Ratify Named Executive Officers' Compensation	Report on Executive Pay Calibration to Externalized Costs	Commission Independent Assessment of Effectiveness of Audit and Compliance Committee
How the manager voted	Against	Against	Against	Against
Rationale for the voting decision	The shareholder proposal is overly prescriptive	In the absence of significant concerns, this proposal merits support	This proposal does not merit support due to pay concerns	This proposal does not merit support as the company's disclosures pertaining to the item are not in line with SSGA's policy
Outcome of the vote	Fail	Pass	Fail	Fail

	Vote 1	Vote 2	Vote 3	Vote 4
Implications of the outcome	Where appropriate State Street will contact the company to explain their voting rationale and conduct further engagement.			
Criteria on which the vote is considered "significant"	State Street considers votes on environmental related proposals to be significant.	State Street considers votes on compensation to be significant.	State Street considers votes on environmental and social related proposals to be significant	State Street considers votes on environmental and social related proposals to be significant

Fund level engagement

The fund managers may engage with investee companies on behalf of the Trustee. The table below provides a summary of the engagement activities undertaken by each fund manager during the year for the relevant funds.

State Street carry out engagement activities at a firm-wide level. Engagement activities are limited for the Scheme's LDI and liquidity funds due to the nature of the underlying holdings, so engagement information for these assets have not been shown.

Manager	State Street	Insight
Fund name	All World Screened Index Equity Sub-Fund	High Grade ABS Fund
Number of engagements undertaken on behalf of the holdings in this fund in the year	570	60-70
Number of engagements undertaken on behalf of the holdings on environmental topics in this fund in the year*	189	Not split out of total
Number of engagements undertaken on behalf of the holdings on social topics in this fund in the year*	160	Not split out of total
Number of engagements undertaken on behalf of the holdings on governance topics in this fund in the year*	460	Not split out of total
Number of entities engaged on behalf of the holdings in this fund in the year	440	c.55
Number of engagements undertaken at a firm level in the year	948	2,521

*There may be some double counting over topics, meaning the sum of the three is larger than the total engagements

Examples of engagement activity undertaken over the year to 31 March 2024

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

Rio Tinto Plc .

SSgA first engaged with Rio Tinto at the firm's 2022 AGM, where they voted against the chair of the nominating and governance committee, as the company did not disclose the gender, racial, and ethnic composition of their boards. SSgA engaged with management to communicate their disclosure expectations, Rio Tinto committed to updating this in their 2022 annual report, due to this commitment SSgA waived their vote against re-election of the chair of Rio Tinto's nominating committee in 2022.

In 2023, SSgA reviewed the relevant materials including the firm's annual report and found that Rio Tinto had implemented the disclosures that SSgA had requested. As such, the firm supported the chair of the nominating committee at their 2023 AGM.

Pepper

Insight engaged with Pepper over ESG considerations in their loan origination and underwriting process. ESG had not previously formed part of their loan origination, so Insight identified Pepper as an issuer to engage with in this area of concern.

The first engagement occurred in Q4 2022 in a meeting between Insight and the Deputy Head of Treasury at Pepper. Subsequent engagements occurred in Q2 2023 relating to their new product range and EPC data analysis. Pepper is now showing borrowers the potential EPC improvements they can make to their properties and linking into new business. They have also made cash back opportunities for an EPC focussed 2nd lien loan.

The outcome of the engagements were positive in terms of disclosure, however, loan level disclosures and loan practices outcomes were less positive and Insight will continue to engage on these aspects.