

Engagement Policy Implementation Statement

Date: 29 March 2021

Prepared for: The Trustees of the Wyevale Garden Centres Limited 1993 Group Pension & Life Assurance Scheme

Prepared by: Aon

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 31 December 2020. 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 Trustees recognise that they have a responsibility to be stewards of the Scheme beneficiaries' capital and believe that Just and 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 Trustees recognise that they cannot directly influence the ESG integration nor stewardship policies and practices of Just and Aviva and, given the nature of the Scheme's arrangements, do not have a formal policy on stewardship matters. Instead, the Trustees have delegated the responsibility for these matters to the insurance companies from whom the Trustees have 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
28 July 2021