

Presspart Retirement Benefits Scheme

Implementation Statement – 2022/23

April 2023

1 Introduction

- 1.1 The purpose of the Implementation statement is to help ensure that the actions of Trustees of the Presspart Retirement Benefits Scheme (the Scheme) have followed the intent of the Statement of Investment Principles prepared by the Trustees.
- 1.2 In preparing this statement the Trustees have consulted Presspart Manufacturing Limited, the Principal Employer, and obtained input from Rathbone Investment Management Limited, the Scheme's fund manager.
- 1.3 The statement has been prepared with regard to the 2018 regulatory changes to the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013. The 2019 changes were made in order to implement the European Union's amended Shareholder Rights Directive II (SRD II), requiring further detail on trustees' stewardship policies to be added to pension scheme SIPs by 1 October 2020.

2 Areas of Focus

- 2.1 Under the new legislation, the Trustees are required – in addition to those requirements under the 2018 changes, to prepare an annual implementation statement setting out, how the SIP has been followed over the year, also to be published on a publicly available website
- 2.2 From 1 October 2021, Trustees of the Scheme will be required to produce an annual Implementation Statement on their engagement and voting practices and to publish these on a publicly available website by 1 October 2021. This statement will cover the implementation of their policies pertaining to the exercise of rights (including voting rights) attaching to the investments and undertaking engagement activities in respect of these investments.
- 2.3 Description of voting behaviour (including "most significant" votes by, or on behalf of, the trustee) and any use of a proxy voter during the year.
- 2.4 The SIP states that the fund managers will present an annual stewardship engagement report, detailing proxy voting record, ESG engagement and indicators of responsible non-financial performance. The IPS demonstrates how the Trustees have monitored and engaged with the investment managers approach to voting.
- 2.5 The investments of the portfolio will be managed within parameters focussed on Socially Responsible Investment, Corporate Governance and Voting Rights

2.6 The Trustees are comfortable that the investment manager is managing the relevant funds with ESG considered in a reasonable way for each particular asset class and within particular guidelines and restrictions. The Scheme's fund manager is expected to ultimately act in the best interests of the Scheme's assets to maximise returns for a given level of risk, subject to certain constraints.

3 Implementation of voting rights

3.1 The Scheme assets equity holdings are structured in two ways: direct equity holdings and pooled equity investment vehicles.

3.2 The trustees have followed the SIP closely over the years and Rathbones has presented the annual stewardship engagement report, detailing proxy voting record, ESG engagement and indicators of responsible non-financial performance for all the direct equity holdings, please see appendix 1

3.3 As per the SIP voting has been delegated to the investment manager and is in line with the Rathbones policy of investing responsibly, please see appendix 2.

3.4 The voting carried out on behalf of the Scheme is monitored yearly with a full break down of the number of opportunities the Scheme had to vote, how many times the Scheme voted and why the decision to vote in specific ways was made, see appendix 1.

3.5 The investment manager provided a case by case breakdown of 10 significant votes over the year. These were on company issues or that were significant to the Scheme because of the subject-matter, see appendix 1.

3.6 The investment manager has used Proxy voting services over the year. They have used a combination of ISS and

3.7 In the pooled funds, voting entitlements (where they arise) generally lie with the asset manager, as the legal owner of the securities in the fund. However, the Trustees have discussed with the investment manager how stewardship, including votes will be exercised on their behalf in support of their investment and stewardship beliefs and objectives when choosing to appoint and retain managers.

Appendix 1.

Vote reporting

As At the 05.04.23	
Voting Questionnaire	Response
Scheme Name	The Presspart Retirement Benefits Scheme
Employer Name	H&T Presspart
Investment Manager Name	Rathbones
Scheme year end date	5th April
Start of reporting period	6th April 2022
End of reporting period	5th April 2023

Fund Mandate Informaion	Response
What is the Fund's Legal Entity Identifier (LEI) (if applicable)	
What was the total size of the fund/mandate as at the end of the Reporting Period?	£19,185,210
Total size of Scheme assets invested in the fund/mandate as at the end of the Reporting Period (if known)?	£19,185,210
What was the number of equity holdings in the fund/mandate as at the end of the Reporting period?	28

Voting Policies	Response
What is your policy on consulting with clients before voting?	<p>We are a discretionary fund manager, clients give delegated authority for all aspects of their portfolio management to Rathbones. We set voting policy centrally based on recognised best practice. As such we do not actively seek out the views of clients before voting.</p> <p>However, we are open to hearing from clients where they have views on specific voting items and are prepared to issues split votes to reflect those instructions.</p>

<p>Please provide an overview of your process for deciding how to vote.</p>	<p>Our Responsible Investment Policy commits us to voting on 95% of our assets by value. Our active voting lists comprises our top holdings in UK and international equity, collectives and a subset of smaller companies where we account for greater than 2.5% of shares in issue.</p>
<p>How, if at all, have you made use of proxy voting services?</p>	<p>We use a proxy voting provider to implement our bespoke voting policy. We also use their proxy voting platform.</p>
<p>What process did you follow for determining the “most significant” votes?</p>	<p>Largest votes against management that took place at a company's AGM</p>
<p>Did any of your “most significant” votes breach the client’s voting policy (where relevant)?</p>	<p>N</p>
<p>If ‘Y’ to the above. Please explain where this happened and the rationale for the action taken.</p>	

Voting Policies	Response
<p>Are you currently affected by any of the following five conflicts, or any other conflicts, across any of your holdings?</p> <p>1) The asset management firm overall has an apparent client-relationship conflict e.g. the manager provides significant products or services to a company in which they also have an equity or bond holding;</p> <p>2) Senior staff at the asset management firm hold roles (e.g. as a member of the Board) at a company in which the asset management firm has equity or bond holdings</p> <p>3) The asset management firm’s stewardship staff have a personal relationship with relevant individuals (e.g. on the Board or the company secretariat) at a company in which the firm has an equity or bond holding</p> <p>4) There is a situation where the interests of different clients diverge. An example of this could be a takeover, where one set of clients is exposed to the target and another set is exposed to</p>	<p>We are potentially affected by all 5, but our major conflict of interest is where a private client plays a role on the board of a company where we have an ESG issue. In such circumstances, the affected party can vote as they wish, but their instructions do not affect the group view, say, on executive remuneration. All other conflicts are managed</p>

<p>the acquirer</p> <p>5) There are differences between the stewardship policies of managers and their clients Please include here any additional comments which you believe are relevant to your voting activities or processes</p>	<p>under Rathbones' standard conflicts of interest policy.</p>
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Voting statistics (applicable to the scheme's reporting period)	Response
How many meetings were you eligible to vote at?	2028
How many resolutions were you eligible to vote on?	24944
What % of resolutions did you vote on for which you were eligible?	40.68%
Of the resolutions on which you voted, what % did you vote with management?	89.76%
Of the resolutions on which you voted, what % did you vote against management?*	3.20%
Of the resolutions on which you voted, what % did you abstain from voting?	1.60%
In what % of meetings, for which you did vote, did you vote at least once against management?	N/A
Which proxy advisory services does your firm use, and do you use their standard voting policy or created your own bespoke policy which they then implemented on your behalf?	ISS - we subscribe to their sustainability voting policy. We also have our own bespoke voting policy.
What % of resolutions, on which you did vote, did you vote contrary to the recommendation of your proxy adviser? (if applicable)	5.03% of votes made against our policy recommendations

*Please note that Rathbones managers retain the ability to enter voting instructions which differ from the house view. It is therefore possible for us to enter a split vote in each situation — meaning that for each votable item on a company agenda, we might enter a combination of votes. This means that the numbers expressed as a percentage would not be expected to add up to 100%. We state the percentage to provide some sense of relative scale.

	Vote 1	Vote 2	Vote 3	Vote 4	Vote 5	Vote 6	Vote 7	Vote 8	Vote 9	Vote 10
Company Name	ALPHABET INC USD0.001 Cls A Common Stock	AMAZON COM INC USD0.01 Common Stock	ASTRAZENECA PLC USD0.25 Ordinary Shares	BP PLC USD0.25 Shares	BUNZL PLC 32 1/7p Ordinary Shares	COCA-COLA CO USD0.25 Common Stock	JP MORGAN CHASE & CO USD1 Common Stock	LOCKHEED MARTIN CO USD1 Common Stock	MICROSOFT CORP USD 0.00000625 Common Stock	RECKITT BENCKISER GROUP PLC 10p Ordinary Shares
Date of Vote	01-Jun-22	25-May-22	22-Apr-22	12-May-22	20-Apr-22	26-Apr-22	17-May-22	21-Apr-22	13-Dec-22	20-May-22
Approximate £ size of the holding	£134,242	£194,868	£289,800	£384,192	£242,767	£176,525	£143,480	£275,463	£285,448	£272,362
Summary of Resolution	Report on Metrics and Efforts to Reduce Water Related Risk	Advisory Vote to Ratify Named Executive Officers' Compensation	Re-elect Marcus Wallenberg as Director	Approve Net Zero - From Ambition to Action Report	Re-elect Peter Ventress as Director	Advisory Vote to Ratify Named Executive Officers' Compensation	Advisory Vote to Ratify Named Executive Officers' Compensation	Reduce Ownership Threshold for Shareholders to Call Special Meeting	Report on tax transparency	Elect Alan Stewart
How you voted	FOR	AGAINST	FOR	AGAINST	ABSTAIN	ABSTAIN	AGAINST	FOR	FOR	ABSTAIN
Where you voted against management, did you communicate your intent to the company ahead of the vote?	Yes - we wrote to the Chair of the board ahead of the AGM	Yes - we wrote to the Chair of the board ahead of the AGM	Yes - we wrote to the Chair of the board ahead of the AGM	Yes - we wrote to the Chair of the board ahead of the AGM	Yes - we wrote to the Chair of the board ahead of the AGM	Yes - we wrote to the Chair of the board ahead of the AGM	Yes - we wrote to the Chair of the board ahead of the AGM	Yes - we wrote to the Chair of the board ahead of the AGM	Yes - we wrote to the Chair of the board ahead of the AGM	Yes - we wrote to the Chair of the board ahead of the AGM
Outcome of the vote	23% For	44% Against	19% Against	11.5% Against	10% Against	49.5% Against	68.5% Against	44% For	47% For	0.3% Against

Appendix 2.





Rathbones approach to responsible investing

Responsible investment at Rathbones

We see it as our responsibility to invest for everyone's tomorrow. That means doing the right thing for our clients and for others too.

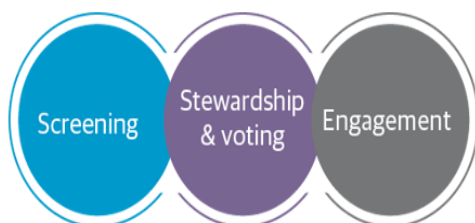
Our ambition is that our responsible investment (RI) proposition will cater to the needs of all clients – whether your interest in environmental, social and governance (ESG) factors is driven by your values or simply by the desire for the best risk-adjusted returns.

We continue to develop our approach to RI through four core principles:

<p>ESG integration 1</p> <p>Where possible, we consider environmental, social and governance (ESG) factors in the evaluation of investments we hold directly for you, to help identify ESG opportunities and risks.</p> <ul style="list-style-type: none"> Our research team and investment committees are actively working to integrate ESG factors into the investment process across all asset classes Material ESG considerations, where identified, are incorporated into investment decisions on a case-by-case basis We review data from a range of sources to inform our analysis 	<p>Voting with purpose 2</p> <p>We actively vote across all votable holdings, unless these are very small. This may involve voting against management to help drive positive change.</p> <ul style="list-style-type: none"> In 2021, we voted on 11,934 resolutions on behalf of clients Voting is undertaken on our most widely held holdings and on any company if requested by a client who is a shareholder of that company Where we have voted against management, most attention has been paid to the independence of group directors, followed by executive remuneration 
<p>Engagement with consequences 3</p> <p>We prioritise engagement where we can make a difference in addressing systemic environmental and social challenges. We are prepared to reduce our holdings in companies that present an ongoing ESG risk.</p> <ul style="list-style-type: none"> Topics include climate change, employment practices, inequality, the composition of boards of directors and remuneration In 2021, we engaged with 705 companies For example, we convened an investor collaboration with £7.8 trillion in assets under management to challenge FTSE 350 companies on their transparency in supply chains in line with the UK Modern Slavery Act 	<p>Transparency 4</p> <p>As a prominent participant in the financial markets, we are committed to being transparent about our approach to RI. We actively report on the progress of our RI activities to our clients, shareholders and other stakeholders.</p> <ul style="list-style-type: none"> We have achieved an A+ rating from the United Nations-backed Principles for Responsible Investment for strategy and governance Our annual report and accounts and responsible investment report reflect our efforts in this area We regularly publish thought leadership and host events about RI themes 

Integrating responsible investing

Our approach to responsible and ethical investing



Understanding not just what a company does, but how a company does it.

- A blend of quantitative tools such as MSCI, with in-depth qualitative research into the company's activities and policies
- Corporate social responsibility report
- Academic studies
- Face-to-face meetings

Capitalise on specialist, ESG capability within Rathbone Greenbank

All research notes fully accessible to all investment managers via our in-house Research Hub

Responsible investment: materiality



CCC	B	BB	BBB	A	AA	AAA
Laggard		Average			Leader	

