

The Mount Charlotte Thistle Hotels  
Retirement Benefits Scheme

**Annual Implementation  
Statement – Scheme year  
ending 30 April 2021**

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## Section 1: Introduction

This document is the Annual Implementation Statement (“the statement”) prepared by the Trustees of the Mount Charlotte Thistle Hotels Retirement Benefits Scheme (“the Scheme”) covering the scheme year (“the Year”) to 30 April 2021.

The purpose of this statement is to set out:

- How, and the extent to which, in the opinion of the Trustees, the Scheme’s engagement policy (required under regulation 23c of the Occupational Pension Schemes Investment Regulations 2005) has been followed during the Year; and
- The voting behaviour by, or on behalf of, the Trustees (including the most significant votes cast by the Trustees or on their behalf) during the Year and state any use of services of a proxy voter during that Year.

The Scheme makes use of a wide range of investments; therefore, the principles and policies in the SIP are intended to be applied in aggregate and proportionately, focussing on areas of maximum impact.

In order to ensure that investment policies set out in the SIP are undertaken only by persons or organisations with the skills, information and resources necessary to take them effectively, the Trustees have delegated some responsibilities. In particular, the Trustees have appointed a Fiduciary Manager, Towers Watson Limited, to manage the Scheme’s assets on a discretionary basis. The Fiduciary Manager’s discretion is subject to guidelines and restrictions set by the Trustees. So far as is practicable, the Fiduciary Manager considers and seeks to give effect to the policies and principles set out in the Trustees’ SIP.

A copy of this implementation statement has been made available on the following website:

<https://www.glhhotels.com/about-glh/statement-of-investment-principles>

### **Review of and changes to the SIP**

The SIP was reviewed and updated in September 2020 to reflect new regulations that came into force from 1 October 2020 which required trustees to set out their policy in relation to their arrangements with asset managers including:

- how the arrangement with the asset manager incentivises the asset manager to align its investment strategy and decisions with the trustees’ policies;
- how that arrangement incentivises the asset manager to make decisions based on assessments about medium to long-term financial and non-financial performance of an issuer of debt or equity and to engage with issuers of debt or equity in order to improve their performance in the medium to long-term;
- how the method (and time horizon) of the evaluation of the asset manager’s performance and the remuneration for asset management services are in line with the trustees’ policies;
- how the trustees monitor portfolio turnover costs incurred by the asset manager, and how they define and monitor targeted portfolio turnover or turnover range; and
- the duration of the arrangement with the asset manager.

This Statement specifically focusses on the SIP agreed in September 2020. All elements that were included in the previously agreed SIP (dated January 2020) remained in the September 2020 SIP.

## Section 2: Voting and Engagement

### Industry wide / public policy engagement:

Regarding engagement, the Trustees' SIP states that:

- “The Fiduciary Manager has appointed Hermes EOS to undertake public policy engagement on its behalf as well as company-level engagement”; and
- “The Trustees expect the Fiduciary Manager to assess the alignment of each investment manager’s approach to sustainable investment (including engagement) with its own before making an investment on the Scheme’s behalf. The Trustees expect the Fiduciary Manager to engage with the Scheme’s investment managers where the Fiduciary Manager considers this appropriate regarding their approach to stewardship with respect to relevant matters including capital structure of investee companies, actual and potential conflicts, other stakeholders and ESG impact of underlying holdings. In addition, the Trustees expect the Fiduciary Manager to review the investment managers’ approach to sustainable investment (including engagement) on a periodic basis and engage with the investment managers to encourage further alignment as appropriate”.

As noted above, the Fiduciary Manager has partnered with EOS at Federated Hermes (EOS) to undertake public policy engagement on behalf of its clients (including the Trustees). The Fiduciary Manager communicates client policies/sentiment to EOS via the Client Advisory Council (chaired by Willis Towers Watson) and EOS subsequently engages with legislators, regulators, industry bodies and other standard-setters to shape capital markets and the environment in which companies and their investors operate, a key element of which is risk related to climate change. Engagement activities by EOS on public policy over the Year included:

- 52 consultation responses or proactive equivalents (such as a letter), and 173 discussions held with relevant regulators and stakeholders;
- Climate Action 100+, an investor initiative aiming to ensure the world’s largest corporate greenhouse gas emitters take necessary action on climate change, where EOS lead or co-lead 30 engagements and support another 14;
- Working closely with the Principles for Responsible Investment (‘PRI’), including leading the engagement with Vale on tailings dam failure, and actively involved in other groups, including cyber risk, water stress, cattle deforestation, palm oil, plastics, cobalt and tax;
- Close collaboration with significant investor initiatives including Investors for Opioid & Pharmaceutical Accountability, Investor Alliance for Human Rights, Plastics Solutions Investor Alliance, 30% Club, and Investor Initiative on Mining & Tailings Safety.

The Fiduciary Manager is also engaged in a number of industry wide initiatives and collaborative engagements including:

- Being a Tier 1 signatory of the 2012 UK Stewardship Code and submitting its first annual report to the 2020 UK Stewardship Code;
- Being a signatory of the Principles for Responsible Investment (PRI) and active member of their Stewardship Advisory Committee;
- Being a member of and contributor to the Institutional Investors Group on Climate Change (IIGCC), Asian Investors Group on Climate Change (AIGCC), and Australasian Investors Group on Climate Change (IGCC);
- Founding the Coalition for Climate Resilient Investment (with the World Economic Forum);
- Co-founding the Investment Consultants Sustainability Working Group; and
- Continuing to lead collaboration through the Thinking Ahead Institute and Willis Research Network.

As set out in Section 1, the Trustees have delegated responsibility to the Fiduciary Manager to implement the Trustees' agreed investment strategy, including making certain decisions about investments (including asset allocation and manager selection/deselection) in compliance with Sections 34 and 36 of the Pensions Act.

The Fiduciary Manager is therefore responsible for managing the sustainability of the portfolio and how Environmental, Social and Governance ("ESG") factors are allowed for in the portfolio.

Consistent with the Trustees' view that ESG factors can have a significant impact on investment returns, particularly over the long-term, the Fiduciary Manager believes that sustainable investment (SI) forms the cornerstone of successful long-term investment and has fully embedded the consideration of ESG factors in its processes.

The Fiduciary Manager's process for selecting, monitoring and de-selecting managers explicitly and formally includes an assessment of a manager's approach to SI (recognising that the degree to which these factors are relevant to any given strategy is a function of time horizon, investment style, philosophy and exposures). Where ESG factors are considered to be particularly influential to outcomes, the Fiduciary Manager engages with investment managers to improve their processes.

The Fiduciary Manager produces detailed reports on the SI characteristics of the highest-rated managers (such as those included in the Scheme's portfolio) on an annual basis.

The policies and processes described above have impacted the Scheme's investments in numerous ways. An example is within the Towers Watson Investment Management ("TWIM") Core Diversified Fund (the "Fund") in which the Scheme invests, where the global equity managers integrate SI into their investment processes. Additionally, the listed real asset holdings were transitioned over the period to funds with a specialist stewardship provider (Federated Hermes EOS) to engage and provide voting advice to companies within the portfolio.

#### **Company level engagement and rights attached to investments (including voting):**

The Trustees have delegated responsibility for the selection, retention and realisation of investments to the Fiduciary Manager, and in turn to the Scheme's investment managers. The day-to-day integration of ESG considerations and stewardship activities (including voting and engagement) are delegated to the Scheme's investment managers.

Through the engagement undertaken by the Fiduciary Manager, the Trustees expect investment managers to sign up to local Stewardship Codes and to act as responsible stewards of capital as applicable to their mandates. The Fiduciary Manager considers the investment managers' policies and activities in relation to ESG and stewardship both at the appointment of a new manager and on an ongoing basis. The Fiduciary Manager engages with managers to improve their practices and may terminate a manager's appointment if they fail to demonstrate an acceptable level of practice in these areas. However, no managers were terminated on these grounds during the Year.

The Scheme is invested across a diverse range of asset classes which carry different ownership rights, for example fixed income whereby these holdings do not have voting rights attached. This document focusses on the equity holdings, which have voting rights attached.

During the Year, the Scheme's equity holdings were accessed via one pooled fund:

- Towers Watson Core Diversified Fund – which seeks to provide cost effective diversification by making extensive use of Willis Towers Watson's innovative research into passive and smart beta (i.e., ways to get cheaper and more liquid exposure to some traditionally actively managed strategies) opportunities across multiple asset classes and markets, including allocations to equity pooled funds.

The table below sets out a summary of the voting within the Towers Watson Core Diversified Fund and a summary of the most significant votes. This data represents activity over the Year. Manager voting policies are shown in the appendix.

Manager and strategy	Portfolio structure	Voting activity
Towers Watson Core Diversified Fund	Fund of funds	<p>Number of meetings at which the manager was eligible to vote: 1,519</p> <p>Number of resolutions on which manager was eligible to vote: 16,874</p> <p>Percentage of eligible votes cast: 100%</p> <p>Percentage of votes with management: 75%</p> <p>Percentage of votes against management: 25%</p> <p>Percentage of votes abstained from: 1%</p> <p>Of the meetings the manager was eligible to attend, the percentage where the manager voted at least once against management: 18%</p> <p>Of the resolutions where the manager voted, the percentage where the manager voted contrary to the recommendation of the proxy adviser: 1%</p>

In addition, the Towers Watson Core Diversified Fund reported on the most significant votes cast within the underlying pooled funds managed on behalf of the Scheme by third-party investment managers, including reasons why the votes identified were considered significant, the rationale for the voting decision and the outcome of the vote:

Most significant votes cast	Coverage in portfolio (% of Core Diversified Fund)
<p><b><u>Underlying investment manager: Active Chinese Equity</u></b></p> <p><b><u>Company: Great Wall Motor</u></b></p> <p><b>Resolution:</b> Amendments to Articles of Association to shorten notice periods for shareholders.</p> <p><b>How the manager voted:</b> Against</p> <p><b>Rationale for voting decision:</b> Shareholders should be given sufficient time to consider items before general meetings.</p> <p><b>Rationale for being considered a significant vote:</b> Vote against management</p> <p><b>Outcome of the vote:</b> For</p> <p><b>Lessons learned/ future implications (the Investment Manager's views):</b> 1) We tend to be more stringent in our recommendations vs outcome of the votes when it comes to governance matters. Small matters count – we feel there is always scope for our Chinese portfolio companies to become even better over time.</p> <p>2) We also hope to be even more proactive in the future, i.e., communicating proactively with portfolio companies on our vote against decisions afterwards.</p>	0.1%

<p><b><u>Underlying investment manager: Active Chinese Equity</u></b></p> <p><b><u>Company: China Telecom</u></b></p> <p><b>Resolution:</b> Authority to Issue Shares without preemptive rights.</p> <p><b>How the manager voted:</b> Against</p> <p><b>Rationale for voting decision:</b> Concerns about potentially excessive dilution. Company also does not need to issue new shares given a healthy balance sheet.</p> <p><b>Rationale for being considered a significant vote:</b> Voted against management</p> <p><b>Outcome of the vote:</b> For</p> <p><b>Lessons learned/ future implications:</b> As per Great Wall Motor vote</p>	0.1%
<p><b><u>Underlying investment manager: Active Chinese Equity</u></b></p> <p><b><u>Company: Lenovo Group</u></b></p> <p><b>Resolution:</b> Authority to Issue Shares without preemptive rights; Authority to issue repurchased shares.</p> <p><b>How the manager voted:</b> Against</p> <p><b>Rationale for voting decision:</b> Not supported due to potentially large dilution – rights issue for all shareholders would be preferred if large fund-raising is required.</p> <p><b>Rationale for being considered a significant vote:</b> Voted against provider recommendations</p> <p><b>Outcome of the vote:</b> For</p> <p><b>Lessons learned/ future implications:</b> As per Great Wall Motor vote</p>	0.1%
<p><b><u>Underlying investment manager: Active Chinese Equity</u></b></p> <p><b><u>Company: 51Job</u></b></p> <p><b>Resolution:</b> The election of Cheng Li-Lan</p> <p><b>How the manager voted:</b> Against</p> <p><b>Rationale for voting decision:</b> Overboarded. (Note: this relates to the need for a director to have sufficient time to devote to board roles and concerns can be raised if a director has a significant number of directorships and therefore competing time pressures).</p> <p><b>Rationale for being considered a significant vote:</b> Voted against management</p> <p><b>Outcome of the vote:</b> For</p> <p><b>Lessons learned/ future implications:</b> As per Great Wall Motor vote</p>	0.1%
<p><b><u>Underlying investment manager: Active Chinese Equity</u></b></p> <p><b><u>Company: SF Holding</u></b></p> <p><b>Resolution:</b> Authority to give guarantees for company's wholly owned subsidiary to issue debt financing instruments overseas.</p> <p><b>How the manager voted:</b> For</p> <p><b>Rationale for voting decision:</b> The proposal was supported due to the manager's belief that the strong volume growth and expansion in overseas market needs the capital support, together with the view that management's track record in capital allocation management allocation was solid.</p> <p><b>Rationale for being considered a significant vote:</b> Voted against provider</p>	0.1%

<p>recommendations</p> <p><b>Outcome of the vote:</b> For</p> <p><b>Lessons learned/ future implications:</b> As per Great Wall Motor vote</p>	
<p><b><u>Underlying investment manager: Legal &amp; General Investment Management (LGIM)</u></b></p> <p><b><u>Company: Barclays</u></b></p> <p><b>Resolution:</b> Resolution 29 - approve Barclays' Commitment in Tackling Climate Change. Resolution 30 - approve ShareAction climate change resolution.</p> <p><b>How the manager voted:</b> For</p> <p><b>Rationale for voting decision:</b> The resolution proposed by Barclays sets out its long-term plans and has the backing of ShareAction and co-filers. We are particularly grateful to the Investor Forum for the significant role it played in coordinating this resolution.</p> <p><b>Rationale for being considered a significant vote:</b> LGIM considers it imperative that boards tackle climate change issues.</p> <p><b>Outcome of the vote:</b> Resolution 29: supported by 99.9% of shareholders – For; Resolution 30: supported by 23.9% of shareholders – Against.</p> <p><b>Lessons learned/ future implications (the Investment Manager's views):</b> Our focus will now be to help Barclays on the detail of their plans and targets, more detail of which is to be published this year. We plan to continue to work closely with the Barclays board and management team in the development of their plans and will continue to liaise with ShareAction, Investor Forum, and other large investors, to ensure a consistency of messaging and to continue to drive positive change.</p>	<p>0.1%</p>
<p><b><u>Underlying investment manager: Legal &amp; General Investment Management (LGIM)</u></b></p> <p><b><u>Company: Olympus Corporation</u></b></p> <p><b>Resolution:</b> Elect Director Takeuchi, Yasuo at the company's annual shareholder meeting held on 30 July 2020.</p> <p><b>How the manager voted:</b> Against</p> <p><b>Rationale for voting decision:</b> Japanese companies in general have trailed behind European and US companies, as well as companies in other countries, in ensuring more women are appointed to their boards. The lack of women is also a concern below board level. LGIM have for many years promoted and supported an increase of women on boards, at the executive level and below. On a global level we consider that every board should have at least one female director. We deem this a de minimis standard. Globally, we aspire to all boards comprising 30% women. Last year in February we sent letters to the largest companies in the MSCI Japan which did not have any women on their boards or at executive level, indicating that we expect to see at least one woman on the board. One of the companies targeted was Olympus Corporation. In the beginning of 2020, we announced that we would commence voting against the chair of the nomination committee or the most senior board member (depending on the type of board structure in place) for those companies included in the TOPIX100. We opposed the election of this director in his capacity as a member of the nomination committee and the most senior member of the board, in order to signal that the company needed to take action on this issue.</p> <p><b>Rationale for being considered a significant vote:</b> This vote is deemed</p>	<p>0.1%</p>



<p>significant as LGIM considers it imperative that the boards of Japanese companies increase their diversity.</p> <p><b>Outcome of the vote:</b> For</p> <p><b>Lessons learned/ future implications (the Investment Manager’s views):</b> LGIM will continue to engage with and require increased diversity on all Japanese company boards.</p>	
<p><b><u>Underlying investment manager: Legal &amp; General Investment Management (LGIM)</u></b></p> <p><b><u>Company: Amazon</u></b></p> <p><b>Resolution:</b> Shareholder resolutions 5 to 16</p> <p><b>How the manager voted:</b> Of 12 shareholder proposals, we voted to support 10. We looked into the individual merits of each individual proposal, and there are two main areas which drove our decision-making: disclosure to encourage a better understanding of process and performance of material issues (resolutions 5, 6, 7, 8, 10, 13, 15 and 16) and governance structures that benefit long-term shareholders (resolutions 9 and 14).</p> <p><b>Rationale for voting decision:</b> In addition to facing a full slate of proxy proposals, in the two months leading up to the annual meeting, Amazon was on the front lines of a pandemic response. The company was already on the back-foot owing to the harsh workplace practices alleged by the author of a seminal article in the New York Times published in 2015, which depicted a bruising culture. The news of a string of workers catching COVID-19, the company’s response, and subsequent details, have all become major news and an important topic for our engagements leading up to the proxy vote. Our team has had multiple engagements with Amazon over the past 12 months. The topics of our engagements touched most aspects of ESG, with an emphasis on social topics:</p> <ul style="list-style-type: none"> <li>• Governance: Separation of CEO and board chair roles, plus the desire for directors to participate in engagement meetings</li> <li>• Environment: Details about the data transparency committed to in their 'Climate Pledge'</li> <li>• Social: Establishment of workplace culture, employee health and safety</li> </ul> <p>The allegations from current and former employees are worrying. Amazon employees have consistently reported not feeling safe at work, that paid sick leave is not adequate, and that the company only provides an incentive of \$2 per hour to work during the pandemic. Also cited is an ongoing culture of retaliation, censorship, and fear. We discussed with Amazon the lengths the company is going to in adapting their working environment, with claims of industry leading safety protocols, increased pay, and adjusted absentee policies. However, some of their responses seemed to have backfired. For example, a policy to inform all workers in a facility if COVID-19 is detected has definitely caused increased media attention.</p> <p><b>Rationale for being considered a significant vote:</b> The market attention was significant leading up to the AGM, with:</p> <ul style="list-style-type: none"> <li>• 12 shareholder proposals on the table – the largest number of any major US company this proxy season</li> <li>• Diverse investor coalitions submitting and rallying behind the proposals, including global, different types of investors and first-time co-filers/engagers</li> <li>• Substantial press coverage – with largely negative sentiment related to the company’s governance profile and its initial management of COVID-19</li> </ul>	0.1%

<ul style="list-style-type: none"> <li>Multiple state treasurers speaking out and even holding an online targeted pre-annual meeting investor forum entitled 'Workplace &amp; Investor Risks in Amazon.com, Inc.'s COVID-19 Response'</li> </ul> <p>Anecdotally, the Stewardship team received more inquires related to Amazon than any other company this season.</p> <p><b>Outcome of the vote:</b> Resolution 5 to 8, and 14 to 16 each received approx. 30% support from shareholders. Resolutions 9 and 10 received respectively 16.7% and 15.3% support.</p> <p>Resolution 11 received 6.1% support. Resolution 12 received 1.5% support. Resolution 13 received 12.2% support.</p> <p><b>Lessons learned/ future implications (the Investment Manager's views):</b> Despite shareholders not giving majority support to the raft of shareholder proposals, the sheer number and focus on these continues to dominate the landscape for the company. Our engagement with the company continues as we push it to disclose more and to ensure it is adequately managing its broader stakeholders, and most importantly, its human capital.</p>	
<p><b><u>Underlying investment manager: Legal &amp; General Investment Management (LGIM)</u></b></p> <p><b><u>Company: ExxonMobil</u></b></p> <p><b>Resolution:</b> Elect Director Darren W. Woods</p> <p><b>How the manager voted:</b> Against</p> <p><b>Rationale for voting decision:</b> In June 2019, under our annual 'Climate Impact Pledge' ranking of corporate climate leaders and laggards, we announced that we will be removing ExxonMobil from our Future World fund range and will be voting against the chair of the board. Ahead of the company's annual general meeting in May 2020, we also announced we will be supporting shareholder proposals for an independent chair and a report on the company's political lobbying. Due to recurring shareholder concerns, our voting policy also sanctioned the reappointment of the directors responsible for nominations and remuneration.</p> <p><b>Rationale for being considered a significant vote:</b> We voted against the chair of the board as part of LGIM's 'Climate Impact Pledge' escalation sanction.</p> <p><b>Outcome of the vote:</b> 93.2% of shareholders supported the re-election of the combined chair and CEO Darren Woods. Approximately 30% of shareholders supported the proposals for independence and lobbying.</p> <p><b>Lessons learned/ future implications (the Investment Manager's views):</b> We believe this sends an important signal, and will continue to engage, both individually and in collaboration with other investors, to push for change at the company. Our voting intentions were the subject of over 40 articles in major news outlets across the world, including Reuters, Bloomberg, Les Échos and Nikkei, with a number of asset owners in Europe and North America also declaring their intentions to vote against the company.</p>	0.1%
<p><b><u>Underlying investment manager: State Street Global Advisors (SSGA), accessed via the Asset Management Exchange ("AMX") platform</u></b></p> <p><b><u>Company: Goodman Group</u></b></p> <p><b>Resolution:</b> Advisory vote to ratify named Executive Officers' Compensation</p> <p><b>How the manager voted:</b> Against</p>	0.1%

**Rationale for voting decision:** This item does not merit support as SSGA has concerns with the proposed remuneration structure for senior executives at the company.

**Rationale for being considered a significant vote:** Voted against management

**Outcome of the vote:** For

**Lessons learned/ future implications (the Investment Manager's views):** Where appropriate we will contact the company to explain voting rationale and conduct further engagement.

## Section 3: Summary and conclusions

We consider that all SIP policies and principles were adhered to.

# Appendix 1: Manager voting policies

## **Towers Watson Investment Management's ("TWIM") voting policy is provided below**

As TWIM manages Fund of Funds, the voting rights for the holdings are the responsibility of the underlying managers. TWIM expects all the underlying managers who hold equities over a reasonable timeframe to vote all shares they hold.

As at the year end the Towers Watson Core Diversified Fund held the majority of its equity holdings via the AMX platform which uses EOS at Federated Hermes for voting recommendation services (via the ISS platform) to enhance engagement and achieve responsible ownership. The underlying managers must provide an explanation and note their rationale when they choose to vote differently to the recommendation.

There was also an allocation of equity holdings held with Legal and General Investment Management ("LGIM") during the Scheme Year and an active manager in a China Equity Fund. The voting policies of each of these managers are set out below.

### **LGIM's voting policy is provided below:**

#### **"Policy on consulting clients:**

LGIM's voting and engagement activities are driven by ESG professionals and their assessment of the requirements in these areas seeks to achieve the best outcome for all our clients. Our voting policies are reviewed annually and take into account feedback from our clients.

Every year, LGIM holds a stakeholder roundtable event where clients and other stakeholders (civil society, academia, the private sector and fellow investors) are invited to express their views directly to the members of the Investment Stewardship team. The views expressed by attendees during this event form a key consideration as we continue to develop our voting and engagement policies and define strategic priorities in the years ahead. We also take into account client feedback received at regular meetings and/ or ad-hoc comments or enquiries.

#### **Process for deciding how to vote:**

All decisions are made by LGIM's Investment Stewardship team and in accordance with our relevant Corporate Governance & Responsible Investment and Conflicts of Interest policy documents which are reviewed annually. Each member of the team is allocated a specific sector globally so that the voting is undertaken by the same individuals who engage with the relevant company. This ensures our stewardship approach flows smoothly throughout the engagement and voting process and that engagement is fully integrated into the vote decision process, therefore sending consistent messaging to companies.

#### **Use of proxy voting services:**

LGIM's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by LGIM and we do not outsource any part of the strategic decisions. Our use of ISS recommendations is purely to augment our own research and proprietary ESG assessment tools. The Investment Stewardship team also uses the research reports of Institutional Voting Information Services (IVIS) to supplement the research reports that we receive from ISS for UK companies when making specific voting decisions

To ensure our proxy provider votes in accordance with our position on ESG, we have put in place a custom voting policy with specific voting instructions. These instructions apply to all markets globally and seek to uphold what we consider are minimum best practice standards which we believe all companies globally should observe, irrespective of local regulation or practice.

We retain the ability in all markets to override any vote decisions, which are based on our custom voting policy. This may happen where engagement with a specific company has provided additional information (for example from direct engagement, or explanation in the annual report) that allows us to apply a qualitative overlay to our voting judgement. We have strict monitoring controls to ensure our votes are fully and effectively executed in accordance with our voting policies by our service provider. This includes a regular manual check of the votes input into the platform, and an electronic alert service to inform us of rejected votes which require further action.”

**The active manager – China equity’s voting policy is provided below**

“[We use] Glass Lewis as proxy voting service vendor to process votes on resolutions of investment companies in their shareholders’ meetings. The service platform allows us to source voting ballots from multiple custodians, provide voting research papers with detailed analysis and recommendations it also allows us to submit voting decisions in an efficient centralised manner. It also possesses a reporting function on voting data in various formats which is helpful in reporting to our clients.”