Quadron Services Limited Pension & Life Assurance Scheme

Engagement policy implementation statement for the year ended 5 April 2023

During the year ended 5 April 2023, the Scheme's investment policies were implemented in line with the principles set out in the Scheme's Statement of Investment Principles.

Compliance with the Statement of Investment Principles (SIP) over the year

The SIP in place during the year was adopted in July 2022. The SIP has not been otherwise reviewed during the Scheme year and there have been no significant changes in investment policy during the Scheme year.

Governance

The investment objectives of the Scheme are:

- a. The acquisition of suitable assets of appropriate liquidity which will generate income and capital growth to meet, together with contributions from the Employer, the cost of benefits which the Scheme provides as set out in the Trust Deed and Rules;
- b. So far as reasonably possible, to avoid the risk of the assets failing to meet the liabilities on an ongoing basis; and
- c. To minimise the long term costs of the Scheme by maximising the return on the assets so far as is both prudent and consistent with the above objectives.

The Trustee has agreed to appoint a number of investment managers, utilising a variety of assets, in the following proportions:

Fund	Allocation
Baillie Gifford Global Alpha Growth Fund	20.5%
Baillie Gifford Diversified Growth Fund	21.5%
Legal & General Multi-Asset Fund	21.5%
Legal & General Absolute Return Bond Plus Fund	12%
Partners Generations Fund	6%
Legal & General Fixed Short & Long Matching Core Funds	4%
Legal & General Real Short & Long Matching Core Funds	14.5%

The Trustee aims to achieve a 90% inflation risk hedge and 90% interest rate hedge on the Scheme's liabilities through investment in Legal and General Matching Core LDI funds. Consequently, in order to achieve the desired hedge, the final asset allocations may need adjustment.

Once the investments in the Legal and General Matching Core LDI funds has been settled, the remaining assets will be invested in the Baillie Gifford Global Alpha Growth Fund, the Baillie Gifford Diversified Growth Fund, the Legal & General Multi-Asset Fund, the Legal & General Absolute Return Bond Plus Fund and the Partners Generations Fund in the proportions of 20.5:21.5:21.5:12:6.

The funds are to be held on an investment platform provided by Mobius Life Limited.

The Trustee believes that the assets are invested in a manner appropriate to the nature and duration of the expected future retirement benefits payable under the Scheme.

The Scheme's investments will be kept under regular review.

The Trustee considers that the distribution of the funds represents a suitable asset allocation benchmark for the Scheme. The Trustee considers that this policy represents investment in suitable assets, is appropriately diversified, and provides a reasonable expectation of meeting the above objectives.

Expected Return on Investments

The investment strategy was developed by considering the Trustee's appetite for risk, in consultation with the Employer. The investment strategy was chosen to achieve a required return over gilts, based on the expected return on asset classes, within the appetite for risk as measured by the likely range of potential outcomes. In the Trustee's opinion, the chosen strategy offers an acceptable trade-off between risk and return.

Over the long-term, it is expected that the Scheme's investment returns will exceed the return required to fund the Scheme's Technical Provisions in the medium to long term.

Realisation of Investments

The Trustee will hold sufficient cash to meet the likely expenditure on benefits and expenses from time to time. The Trustee will also hold sufficient assets in liquid investments to meet unexpected cashflow requirements in the majority of circumstances so that, where possible, the realisation of assets will not disrupt the Scheme's overall investment policy.

Environmental, Social and Corporate Governance ("ESG") Matters

The Trustee's overarching responsibility is to deliver financially sustainable returns for an acceptable level of risk to meet the future pension benefits of the members and in a way that Employer contributions paid into the Scheme are as stable and affordable as possible.

The Trustee has a duty to act in the financial interests of the Scheme's beneficiaries as a long-term investor. This includes considering ESG risks and opportunities that may be financially material to the Scheme.

The Trustee invests in pooled funds and the underlying assets are subject to the investment manager's own policies on ESG considerations, including climate change. The Trustee undertakes due diligence when appointing investment managers and review each of those managers' policies on ESG considerations. The Trustee appreciates that those investment managers which integrate ESG considerations can help mitigate risks and have the potential to lead to better, long-term financial outcomes.

The appointed investment managers have opted to sign the United Nations-supported Principles for Responsible Investment ("PRI"). As signatories to the PRI, the investment managers have made the following commitments:

As institutional investors, we have a duty to act in the best long-term interests of our beneficiaries. In this fiduciary role, we believe that environmental, social, and corporate governance (ESG) issues can affect the performance of investment portfolios (to varying degrees across companies, sectors, regions, asset classes and through time).

We also recognise that applying these Principles may better align investors with broader objectives of society. Therefore, where consistent with our fiduciary responsibilities, we commit to the following:

Principle 1: We will incorporate ESG issues into investment analysis and decision-making processes.

Principle 2: We will be active owners and incorporate ESG issues into our ownership policies and practices.

Principle 3: We will seek appropriate disclosure on ESG issues by the entities in which we invest.

Principle 4: We will promote acceptance and implementation of the Principles within the investment industry.

Principle 5: We will work together to enhance our effectiveness in implementing the Principles.

Principle 6: We will each report on our activities and progress towards implementing the Principles.

The investment managers' reports related to PRI and their statements on compliance with the Financial Reporting Council (FRC) Stewardship Code, which is seen as the UK standard for good stewardship, are reviewed by the Trustee at least once every three years.

Additional Voluntary Contribution arrangements

The Scheme has provided a facility for members to pay additional voluntary contributions (AVCs) to enhance their benefits at retirement. The Trustee's objective was to provide vehicles that enabled members to generate suitable long-term returns, consistent with their reasonable expectations.

In the past AVCs were paid to Prudential Assurance Company Limited (Prudential) to enhance benefits at retirement. The Trustee selected these vehicles as they were believed to meet the Trustee's objective of providing investment options that enabled AVC members to generate suitable long-term returns.

Voting behaviour

(i) Baillie Gifford

All voting decisions are made by Baillie Gifford's ESG team in conjunction with investment managers. Baillie Gifford do not regularly engage with clients prior to submitting votes, however if a segregated client has a specific view on a vote then Baillie Gifford's will engage with them on this. If a vote is particularly contentious, Baillie Gifford may reach out to clients prior to voting to advise them of this or request them to recall any stock on loan.

Thoughtful voting of Baillie Gifford clients' holdings is an integral part of their commitment to stewardship. They believe that voting should be investment led, because how they vote is an important part of the long-term investment process, which is why their strong preference is to be given this responsibility by their clients.

The ability to vote their clients' shares also strengthens their position when engaging with investee companies.

Baillie Gifford's ESG team oversees the voting analysis and execution in conjunction with their investment managers.

Baillie Gifford do not outsource any part of the responsibility for voting to third party suppliers. Baillie Gifford utilise research from proxy advisers for information only. Baillie Gifford analyses all meetings in-house in line with their ESG Principles and Guidelines and endeavour to vote every one of their clients' holdings in all markets.

Whilst they are cognisant of proxy advisers' voting recommendations (ISS and Glass Lewis), they do not delegate or outsource any of their stewardship activities or follow or rely upon their recommendations when deciding how to vote on their clients shares. All client voting decisions are made in-house. Baillie Gifford vote in line with their in-house policy and not with the proxy voting providers' policies. They also have specialist proxy advisors in the Chinese and Indian markets to provide more nuanced market specific information.

(ii) LGIM

LGIM's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote on clients' shares. All voting decisions are made by LGIM and they do not outsource any part of the strategic decisions. To ensure their proxy provider votes in accordance with their position on ESG, they have put in place a custom voting policy with specific voting instructions. These instructions apply to all markets globally and seek to uphold what they consider are minimum best practice standards which they believe all companies globally should observe, irrespective of local regulation or practice.

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 their clients. Their voting policies are reviewed annually and take into account feedback from their 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 they continue to develop their voting and engagement policies and define strategic priorities in the years ahead. They also take into account client feedback received at regular meetings and/ or ad-hoc comments or enquiries.

All decisions are made by LGIM's Investment Stewardship team and in accordance with their 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 their 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.

Their use of ISS recommendations is purely to augment their 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 they receive from ISS for UK companies when making specific voting decisions.

They retain the ability in all markets to override any vote decisions, which are based on their 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 them to apply a qualitative overlay to their voting judgement. They have strict monitoring controls to ensure their votes are fully and effectively executed in accordance with their voting policies by their service provider. This includes a regular manual check of the votes input into the platform, and an electronic alert service to inform them of rejected votes which require further action.

The proxy voting service are regularly monitored and LGIM do this through quarterly due diligence meetings with ISS. Representatives from a range of departments attend these meetings, including the client relationship manager, research manager and custom voting manager. The meetings have a standing agenda, which includes setting out their expectations, an analysis of any issues they have experienced when voting during the previous quarter, the quality of the ISS research delivered, general service level, personnel changes, the management of any potential conflicts of interest and a review of the effectiveness of the monitoring process and voting statistics. The meetings will also review any action points arising from the previous quarterly meeting.

LGIM has its own internal Risk Management System (RMS) to provide effective oversight of key processes. This includes LGIM's voting activities and related client reporting. If an item is not confirmed as completed on RMS, the issue is escalated to line managers and senior directors within the organisation. On a weekly basis, senior members of the Investment Stewardship team confirm on LGIM's internal RMS that votes have been cast correctly on the voting platform and record any issues experienced. This is then reviewed by the Director of Investment Stewardship who confirms the votes have been cast correctly on a monthly basis. Annually, as part of our formal RMS processes the Director of Investment Stewardship confirms that a formal review of LGIM's proxy provider has been conducted and that they have the capacity and competency to analyse proxy issues and make impartial recommendations.

(iii) Partners Group

Partners Group do not consult with clients before voting. Their voting is based on the internal Proxy Voting Directive.

Partners Group hire the services of Glass Lewis & Co, which is one of the leading global proxy voting service providers, and they have been instructed to vote in-line with their Proxy Voting Directive.

Wherever the recommendations for Glass Lewis, their proxy voting directive, and the company's management differ, Partners Group vote manually on those proposals.

Significant votes for the Scheme during the year

Criteria of the investment managers

(i) Baillie Gifford

Baillie Gifford have identified the following list of criteria, which is not exhaustive, that they have used to determine their most significant votes.

- Baillie Gifford's holding had a material impact on the outcome of the meeting.
- The resolution received 20% or more opposition and Baillie Gifford opposed.
- Egregious remuneration.
- Controversial equity issuance.
- Shareholder resolutions that Baillie Gifford supported and received 20% or more support from shareholders.
- Where there has been a significant audit failing.
- Where Baillie Gifford have opposed mergers and acquisitions.
- Where Baillie Gifford have opposed the financial statements/annual report.
- Where Baillie Gifford have opposed the election of directors and executives.

(ii) LGIM

As regulation on vote reporting has recently evolved with the introduction of the concept of 'significant vote' by the EU Shareholder Rights Directive II, LGIM wants to ensure they continue to help their clients in fulfilling their reporting obligations. They also believe public transparency of their vote activity is critical for their clients and interested parties to hold them to account.

For many years, LGIM has regularly produced case studies and/ or summaries of LGIM's vote positions to clients for what they deemed were 'material votes'. They are evolving their approach in line with the new regulation and are committed to provide their clients access to 'significant vote' information.

In determining significant votes, LGIM's Investment Stewardship team takes into account the criteria provided by the Pensions & Lifetime Savings Association (PLSA) guidance. This includes but is not limited to:

- High profile vote which has such a degree of controversy that there is high client and/ or public scrutiny;
- Significant client interest for a vote: directly communicated by clients to the Investment Stewardship team at LGIM's annual Stakeholder roundtable event, or where they note a significant increase in requests from clients on a particular vote;
- Sanction vote as a result of a direct or collaborative engagement;
- Vote linked to an LGIM engagement campaign, in line with LGIM Investment Stewardship's 5year ESG priority engagement themes.

They provide information on significant votes in the format of detailed case studies in their quarterly ESG impact report and annual active ownership publications.

The vote information is updated on a daily basis and with a lag of one day after a shareholder meeting is held. The rationale for all votes cast against management, including votes of support to shareholder resolutions is also provided.

(iii) Partners Group

Partners Group use the size of the holding in the fund to determine their most significant votes.

Voting statistics

The table below sets out the key statistics on the investment managers' voting eligibility and action over the Scheme year. This only covers the funds that invest in equities.

Statistic	Baillie Gifford Diversified Growth Fund	Baillie Gifford Global Alpha Growth Fund	LGIM Multi- Asset Fund	LGIM Absolute Return Bond Plus Fund	Partners Group
Number of equity holdings as at 31 March 2023	54	92	6288	0	63
Meetings eligible to vote at	97	94	9818	2	69
Resolutions eligible to vote on	1061	1173	100094	12	959
Percentage of eligible resolutions voted on	97.93%	98.29%	99.83%	100%	100%
Votes with management	95.77%	97.22%	77.55%	83.33%	95%
Votes against management	3.27%	2.52%	21.73%	16.67%	2%
Votes abstained from	0.96%	0.26%	0.72%	0%	2%
Meetings where at least one vote was against	22.68%	21.28%	71.06%	50%	20%
Votes contrary to the recommendation of the proxy adviser (if applicable)	N/A	N/A	12.43%	16.67%	1%

The most significant votes for the Scheme during the year have been summarised in the tables on the following pages.

Baillie Gifford Diversified Growth Fund – Most significant votes

	VOTE 1	VOTE 2	VOTE 3
Company name	CBRE GROUP, INC.	LEG IMMOBILIEN SE	DUKE REALTY CORPORATION
Date of vote	18/05/2022	19/05/2022	28/09/2022
Approximate size of fund's holding as at the date of the vote (as % of portfolio)		2.01	14.95
Summary of the resolution	Shareholder Resolution - Governance	Remuneration	Say on Pay Frequency
How you voted	Against	Against	Against
Where you voted against management, did you communicate your intent to the company ahead of the vote?	No	No	Yes
Rationale for the voting decision	We opposed a shareholder resolution to lower the threshold for shareholders to call a special meeting as we consider that the existing threshold is appropriate.	We opposed the executive compensation policy as we do not believe the performance conditions are sufficiently stretching.	We opposed the advisory proposal to approve executive compensation to be paid in connection with the company merger due to concerns regarding single trigger provisions and the introduction of excise tax gross-ups in connection with severance payments.

Outcome of the vote	Fail	Pass	Fail
Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	We opposed the shareholder resolution to lower the ownership threshold to call a special meeting as we were comfortable with the current 25% threshold in place and do not believe that lowering it would be reasonable. Ahead of voting, we had an engagement call with the company to discuss the proposed agenda. We were satisfied to learn about the company's efforts to engage with their holders, including the proponent, who according to the company, did not have any particular concerns over CBRE but backs a lower threshold out of principle. We intend to follow up with the company later in a year to speak about governance developments.	Following our vote decision, we have reached out to the company to let them know about our dissent on remuneration and set out our expectation on pay.	While we were supportive of the proposed merger with Prologis, we were uncomfortable with the compensation arrangements planned for Duke Realty NEOs in connection with the merger and therefore opposed this resolution, which ultimately received 91.64% dissent from shareholders. We unsuccessfully attempted to engage the company on its approach to compensation at this year's AGM and will continue our efforts to do so going forward.
On which criteria have you assessed this vote to be "most significant"?	This resolution is significant because it received greater than 20% opposition.	This resolution is significant because we opposed remuneration.	This resolution is significant because it received greater than 20% opposition.

Baillie Gifford Global Alpha Growth Fund – Most significant votes

	VOTE 1	VOTE 2	VOTE 3
Company name	THE CHARLES SCHWAB CORPORATION	THE TRADE DESK, INC.	TESLA, INC.
Date of vote	17/05/2022	26/05/2022	04/08/2022
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	1.07	1.42	1.78
Summary of the resolution	Shareholder Resolution - Governance	Remuneration	Shareholder Resolution - Social
How you voted	Against	Against	For
Where you voted against management, did you communicate your intent to the company ahead of the vote?	No	No	No

Rationale for the voting decision	We opposed the shareholder resolution for provision of proxy access rights as we believe that the absence of aggregation limits may result in misuse of the shareholder right. We acknowledge managements willingness to progress their governance practices and we	We opposed the executive compensation due to concerns over the quantum and performance conditions attached to the large off-cycle grant made during the year.	We supported the resolution requesting a report on the impact of using mandatory arbitration in line with our voting approach in 2020 and 2021. We believe increased transparency would help us better understand the company's use of the practice and any implications for

Outcome of the vote	Fail	Pass	Fail
Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	We acknowledge managements willingness to progress their governance practices and we supported the management resolution.	We did not feel that the executive compensations large quantum and poor performance aligned with shareholders interests.	We continued to support this proposal after supporting at the 2020 and 2021 AGMs. Our discussions with Tesla have clarified that the company does not require mandatory arbitration nor does it require outcomes of arbitration or litigation to remain confidential, however it does encourage employees to arbitrate. While a standalone report may not be necessary we continue to think increased transparency would help us better understand the company's use of the practice and any implications for workplace practices and culture. Following the submission of our votes we reiterated our position and encouraged improved transparency on these issues.
On which criteria have you assessed this vote to be "most significant"?	This resolution is significant because it received greater than 20% opposition.	This resolution is significant because it received greater than 20% opposition.	This resolution is significant because it was submitted by shareholders and received greater than 20% support.

LGIM Multi-Asset Fund – Most significant votes

	VOTE 1	VOTE 2	VOTE 3
Company name	Royal Dutch Shell Plc	BP Plc	Rio Tinto Plc
Date of vote	24/05/2022	12/05/2022	08/04/2022
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	0.55	0.26	0.22
Summary of the resolution	Resolution 20 - Approve the Shell Energy Transition Progress Update	Resolution 3 - Approve Net Zero - From Ambition to Action Report	Resolution 17 - Approve Climate Action Plan
How you voted	Against	For	Against
Where you voted against management, did you communicate your intent to the company ahead of the vote?	Voted in line with management	Voted in line with management	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.

decision though not with acknowledge the made by the control of though not with acknowledge the made by the control of though not with acknowledge the made by the control of though not with acknowledge.	: A vote against is applied, out reservations. We e substantial progress mpany in strengthening its ssions reduction targets by	note the inherent challenges in the	Climate change: We recognise the considerable progress the company has made in strengthening its operational emissions reduction targets by 2030, together with the commitment for
--	---	-------------------------------------	--

	2030, as well as the additional clarity around the level of investments in low carbon products, demonstrating a strong commitment towards a low carbon pathway. However, we remain concerned of the disclosed plans for oil and gas production, and would benefit from further disclosure of targets associated with the upstream and downstream businesses.	credible transition strategy, consistent with the Paris goals of limiting the global average temperature increase to 1.5 C. It is our view that the company has taken significant steps to progress towards a net zero pathway, as demonstrated by its most recent strategic update where key outstanding elements were strengthened. Nevertheless, we remain committed to continuing our constructive engagements with the company on its net zero strategy and implementation, with particular focus on its downstream ambition and approach to exploration.	substantial capital allocation linked to the company's decarbonisation efforts. However, while we acknowledge the challenges around the accountability of scope 3 emissions and respective target setting process for this sector, we remain concerned with the absence of quantifiable targets for such a material component of the company's overall emissions profile, as well as the lack of commitment to an annual vote which would allow shareholders to monitor progress in a timely manner.
Outcome of the vote	0.799	0.885	0.843
Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.
On which criteria have you assessed this vote to be "most significant"?	LGIM considers this vote significant as it is an escalation of our climate-related engagement activity and our public call for high quality and credible transition plans to be subject to a shareholder vote.	LGIM considers this vote significant as it is an escalation of our climate-related engagement activity and our public call for high quality and credible transition plans to be subject to a shareholder vote.	LGIM considers this vote significant as it is an escalation of our climate-related engagement activity and our public call for high quality and credible transition plans to be subject to a shareholder vote.

LGIM Absolute Return Bond Plus Fund- Most significant votes

There were no significant votes made in relation to the securities held by this fund during the reporting period.

Partners Group - Most significant votes

	VOTE 1	VOTE 2	VOTE 3
Company name	Axia Women's Health	EyeCare Partners	Pharmathen
Date of vote	N/A	N/A	N/A
Summary of the resolution	As we control the Board, please see below the ESG efforts of the portfolio company	As we control the Board, please see below the ESG efforts of the portfolio company	As we control the Board, please see below the ESG efforts of the portfolio company.
How you voted	Control of board	Control of board	Control of board
Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A	N/A	N/A

Rationale for the voting decision	Axia Women's Health has improved its quality of care and clinical outcomes, providing a superior and convenient patient experience, exhibiting a reduction in hospital days per patient to 2.1 days, alongside a 10.9% reduction in c-section rates, and a 67.8 net promoter score.	In 2022, the number of patients served by EyeCare Partners (ECP) rose to 3 million, with the company exceeding its targets for average net promoter score (NPS) for its ECP clinics and Medicare/Medicaid patients served. In 2021, ECP clinics had an NPS score of 89 compared to the target score of 87, and had served 37% of Medicare/Medicaid patients.	In May 2022, Pharmathen launched a sustainability assessment with EcoVadis. The results will be incorporated into Pharmathen's ESG Strategy.
-----------------------------------	---	---	--

Outcome of the vote	N/A	N/A	N/A
Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	The company has launched its first sophisticated employee engagement survey with 73% participation and will use the results to craft specific employee engagement initiatives. Furthermore, Axia Women's Health has established a Risk & Audit committee (including cybersecurity), while ensuring ownership and accountability at executive and board level, and establishing a cyber baseline with regular reporting.	Meanwhile, several initiatives were implemented to improve stakeholder benefits. For instance, significant investment in benefits were made in 2021 and 2022. In addition, the company increased communication around its ECP Cares Foundation, a non-profit organization dedicated to giving back to ECP team members in need. Meanwhile, Incident Frequency Rate (IFR) measures were established and are being captured to drive root-cause analysis and drive prevention strategies. This has engaged employees and helped to increase employee retention to 31% (exceeding the target of 27%). Lastly, baselines and specific initiatives were established based on the doctor and employee engagement surveys conducted during the first half of 2022.	The company has a strong ESG culture as reflected in its core mission of making a positive impact on the lives of people by ensuring that they enjoy better health.
On which criteria have you assessed this vote to be "most significant"?	Size of holding in fund	Size of holding in fund	Size of holding in fund