Home Group Pension & Life Assurance Scheme – DB Section (“the Scheme”)

Annual Implementation Statement – 31 March 2021

1. Introduction

This statement, prepared by the Trustees of the Scheme (“the Trustees”), sets out how, and the extent to which, the Statement of Investment Principles (“SIP”) has been followed during the year to 31 March 2021 (“the Scheme year”). This statement should be read in conjunction with the Scheme’s SIP. This statement also includes a summary of the voting activity that was carried out on behalf of the Trustees over the Scheme year by the investment managers.

This statement has been produced in accordance with the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019 and the guidance published by the Pensions Regulator.

The Scheme has both a Defined Benefit (“DB”) Section and a Defined Contribution (“DC”) Section. This statement covers the DB Section only; a separate statement has been prepared for the DC Section.

2. Statement of Investment Principles

2.1. Investment objectives of the Scheme

The Trustees believe it is important to consider the policies in place in the context of the investment objectives they have set. To guide them in their strategic management of the assets and control of the various risks to which the Scheme is exposed, the Trustees have adopted the following objectives:

- To achieve, a suitable balance between return expectation and risk taken. In deciding what is a suitable balance for the Defined Benefit (DB) Section, the Trustees will consider both their duty to act in the best interests of the members and beneficiaries, and the interests of the sponsoring Employer in relation to the size and volatility of the contribution requirements.

- To ensure that sufficient liquid assets are available to meet benefit payments as they fall due.

- To restore and then maintain the Scheme’s funding position, on an ongoing basis, to at least 100%, accepting short-term fluctuations.
- To ensure the investment strategy is consistent with the funding strategy taking into consideration the assessed strength of the sponsoring Employer covenant.

2.2. Review of the SIP

During the year, the Trustees reviewed the Scheme's SIP. The revision related to the new requirements for the SIP to include the Trustees' policy in relation to their arrangements with their investment managers, including:

- How the arrangement incentivises the investment manager to align its investment strategy and decisions with the Trustees' policies in SIP.
- How that arrangement incentivises the investment 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 evaluation of the investment manager's performance and the remuneration for asset management services are in line with the Trustees' policies mentioned in the SIP.
- How the Trustees monitor portfolio turnover costs incurred by the investment managers and how they define and monitor targeted portfolio turnover or turnover range.
- The duration of the arrangement with the investment managers.

The SIP was approved and adopted at the Trustee meeting on 17 September 2020. The Trustees consulted with the sponsoring company in finalising the SIP.

The latest SIP is publically available and can be accessed by this link:
https://www.homegroup.org.uk/media/mc1hbmer/hgplas-statement-of-investment-principles-2020.pdf

2.3. Assessment of how the policies in the SIP have been followed for the year to 31 March 2021

The information provided in the following section highlights the work undertaken by the Trustees during the Scheme year to 31 March 2021 and sets out how this work followed the Trustees' policies in the SIP.

In summary, it is the Trustees' view that the policies in the SIP have been followed during the Scheme year to 31 March 2021.

Strategic Asset Allocation

	Policy	Relevant section / policy in the SIP	How the policy has been met over the year to 31 March 2021
1	**Kind of investments to be held and the balance between different kinds of investments**	4.2. The Trustees have adopted the following control framework in structuring the Scheme's investments: • There is a role for active management. • At the total DB Section level and within individual manager appointments, investments should be broadly diversified to ensure there is not a concentration of investment with any one issuer. This restriction does not apply to investment in UK Government debt. • Investment in derivatives is permitted within pooled funds as long as they contribute to a reduction in risk or facilitate efficient portfolio management. • Investment may be made in securities that are not traded on regulated markets within pooled funds. Recognising the risks (in particular liquidity and counterparty exposure) such investments will normally only be made with the purpose of reducing the Scheme's mismatch risk relative to its liabilities or to facilitate efficient portfolio management. In any event the Trustees will ensure that the assets of the Scheme are predominantly invested on regulated markets. • Borrowing is not permitted except to cover short-term liquidity requirements. 4.3. The Trustees have agreed to the following benchmark strategy of 75% growth assets and 25% risk-reducing assets. Growth assets are split into Equities (45.0%), Diversified Growth (17.5%), Multi-Asset Credit (7.5%) and Property (5.0%), while risk-reducing assets include Corporate Bonds (25%). Further details of the investment strategy are set out in the Summary of Investment Arrangements.	No new investments were implemented during the course of the Scheme year, and the Trustees continue to hold investments within the Scheme that are consistent with the policies in the SIP. The Trustees monitored their investment strategy over the Scheme year, with support from their investment consultant, Mercer, who provided quarterly monitoring reports presented at the regular Trustees' meetings. Over the year, the Trustees agreed to switch from accumulation share classes to distributing share classes across all assets held with BlackRock and Janus Henderson ("Henderson"). No charges were applied for the stock transfers, and there was no impact on performance or on how the funds are managed from an investment perspective. A review of the investment arrangements in the Scheme was undertaken during the year. More recently, the Trustees undertook an investment strategy training session, provided by the investment consultant. A portion of the training covered climate-aware investing, stewardship and wider climate change investment considerations. Following discussions at a Trustee meeting in March 2021, the Trustees tasked their investment consultant to provide a shortlist of equity funds managed according to a climate-aware investment philosophy. This paper was discussed by the Trustees at their June 2021 meeting, with a decision made to conduct a manager selection exercise with a view to appointing a climate-aware equity manager.

	Policy	Relevant section / policy in the SIP	How the policy has been met over the year to 31 March 2021
2	**Risks, including the ways in which risks are to be measured and managed**	4.1. There are various risks to which any pension scheme is exposed which are considered to be financially material to the Scheme over its anticipated lifetime. The Trustees' policy on risk management is detailed in the SIP (Section 4.1.) Should there be a material change in the Scheme's circumstances, the Trustees will review whether and to what extent the investment arrangements should be altered and, in particular, whether the current risk profile remains appropriate.	The Trustees considered both quantitative and qualitative measures for risks when deciding investment policies, strategic asset allocation and the choice of investment managers, funds and asset classes. During the year, the Trustees considered the majority of these risks by regularly monitoring performance delivered by the investment arrangements by way of quarterly performance reporting. No changes were made to the investments during the year. A strategic assessment of these risks formed part of the investment review the Trustees undertook during the year. This review included consideration of the impact of investment risk on the chance of meeting benefits, as well as the possible structure of a low-dependency long-term investment strategy. As noted above, the outcome of this review is still being discussed.
3	**Expected return on investments**	4.5. The Trustees expect to generate a return, over the long term, in excess of that taken into account in the actuarial assumptions under which the Scheme's funding target has been agreed. It is recognised that, over the short term, performance may deviate significantly from the long-term target. It is further recognised that, by definition, investment performance does not affect DB members' benefit entitlements.	The Trustees review the investment performance on a quarterly basis, based on analysis provided in quarterly monitoring reports by the investment consultant. These reports included a comparison of each manager's performance against their stated performance benchmark and targets, where applicable. In addition, the Trustees also receive and review the quarterly performance reports produced by each investment manager. For the year to 31 March 2021, the Scheme's total portfolio return was 27.1% (net of fees), outperforming the benchmark of 22.1% over the same period.

Investment Mandates

	Policy	Relevant section / policy in the SIP	How the policy has been met over the year to 31 March 2021
4	**Securing compliance with the legal requirements about choosing investments**	In considering the appropriate investments for the Scheme, the Trustees have obtained and considered the written advice of Mercer Limited, whom the Trustees believe to be suitably qualified to provide such advice. The advice received and the arrangements implemented are, in the Trustees' opinion, consistent with the requirements of Section 36 of the Pensions Act 1995 (as amended).	There were no investment changes during the Scheme year. Any concerns on fund performance were discussed with the Scheme's investment consultant. The Trustees sought advice from Mercer in drafting the revised SIP that was agreed in September 2020.
5	**Realisation of Investments**	7.0. The Trustees decide (with advice from their investment managers and/or Investment Consultant) on how investments should be realised for cash to meet Scheme benefits and expenses. Disinvestments may also be made in order to bring the Scheme's asset allocation towards the benchmark allocation and the appropriate source of disinvestments is reviewed quarterly. Investments into the Scheme are considered on a case-by-case basis. 9.0. The selection, retention and realisation of assets is carried out in a way consistent with maintaining the Scheme's overall strategic allocation and consistent with the overall principles set out in this Statement. In general, the investment managers have discretion in the timing of realisations of investments and in considerations relating to the liquidity of those investments held within each fund.	The Trustees are comfortable that all of the DB assets held at the end of the reporting period, which are invested in pooled funds, are readily realisable under normal market conditions. During the year to 31 March 2021, there were three disinvestment actions to meet cash flow requirements, as follows: • In April 2020, the Trustees disinvested £350,000 from Janus Henderson's Corporate Bonds fund, in order to meet cash outgo, while bringing the Scheme's allocation closer to its strategic allocation. • In January 2021, the Trustees disinvested £300,000 from the UBS European Equity Fund. • In February 2021, the Trustees disinvested £400,000 from the UBS North America Equity Hedged Fund. The Trustees received an administration report on a quarterly basis to confirm that core financial transactions are processed within SLAs and regulatory timelines.

	Policy	Relevant section / policy in the SIP	How the policy has been met over the year to 31 March 2021
6	**Financial and non-financial considerations and how those considerations are taken into account in the selection, retention and realisation of investments**	The risks listed in section 5.1 of the SIP are considered by the Trustees to be ‘financially material considerations’. The Trustees believe that good stewardship and environmental, social and governance (“ESG”) issues may have a material impact on investment returns and that good stewardship can create and preserve value for companies and markets as a whole. The Trustees also recognise that long-term sustainability issues, particularly climate change, present risks and opportunities that increasingly may require explicit consideration. Non-financial matters are not taken into account when determining investment policy. Member views are not actively sought. The Trustees would expect to review this policy if there were significant member demand.	The Trustees have identified key investment risks in the SIP. The majority of these risks have been monitored on a quarterly basis by the Trustees through the quarterly reporting from the investment consultant. A strategic assessment of these risks formed part of the investment review the Trustees have undertaken during the year. As noted above, the outcome of this review is still being discussed.

Monitoring the Investment Managers

	Policy	Relevant section / policy in the SIP	How the policy has been met over the year to 31 March 2021
7	**Incentivising investment managers to align their investment strategies and decisions with the Trustees' policies**	9.1. A. Investment managers are appointed based on their capabilities and, therefore, their perceived likelihood of achieving the expected return and risk characteristics required for the asset class being selected. The Trustees look to the investment consultant for their forward-looking assessment of a manager's ability to outperform over a full market cycle. This view will be based on the consultant's assessment of the manager's idea generation, portfolio construction, implementation and business management, in relation to the particular investment fund that the Scheme invests in. The consultant's manager research ratings assist with due diligence and questioning managers during presentations to the Trustees and are used in decisions around selection, retention and realisation of manager appointments. If the investment objective of a particular fund changes, the Trustees will review the fund appointment to ensure it remains appropriate and consistent with the Trustees' wider investment objectives. The Scheme's investment mandates are reviewed following periods of sustained tracking error from their respective benchmarks. The Trustees will review the appropriateness of using active and passive managed funds (on an asset class basis) on an ad-hoc basis. As the Trustees invest in pooled investment vehicles, they accept that they have no ability to specify the risk profile and return targets of the manager, but appropriate funds can be selected to align with the overall investment strategy.	The Trustees' policy on investment manager incentivisation was added in September 2020 to reflect the new requirements. The arrangements in place were reviewed regularly in 2020 through the quarterly monitoring of investment performance. No investment changes were made during the Scheme year. There were also no changes to any of the investment managers' fee schedules over the year. All of the DB Section investments are made through pooled investment vehicles, and as such the Trustee accepts that it has no ability to specify the risk profile and return targets of the investment manager. However, these funds are selected to align with the overall investment strategy.

	Policy	Relevant section / policy in the SIP	How the policy has been met over the year to 31 March 2021
8	**Incentivising the investment managers to make decisions based on assessments about medium to long-term financial and non-financial performance of an issuer of debt or equity**	9.1. B. The Trustees expect investment managers to incorporate the consideration of longer-term factors, such as ESG factors, into their decision-making process where appropriate. Voting and engagement activity should be used by investment managers to discuss the performance of an issuer of debt or equity. The Trustees also consider the Investment Consultant's assessment of how each investment manager embeds ESG into its investment process and how the manager's responsible investment philosophy aligns with the Trustees' responsible investment policy. The Trustees will use this assessment in decisions around selection, retention and realisation of manager appointments.	The Trustees' policy on investment manager incentivisation was added in September 2020 to reflect the new requirements. During the year, the investment consultant kept the Trustees abreast of any changes to the investment manager ratings (both on the management of the strategy and the ESG ratings).
9	**Evaluation of the investment manager's performance and the remuneration for asset management services**	9.1. C. The Trustees receive investment manager performance reports on a quarterly basis, which present performance information over various periods. The Trustees review the absolute performance, relative performance against a suitable index used as the benchmark and against the manager's stated tracking error (over the relevant period) on a net of fees basis. If the manager is not meeting their investment objectives for the mandate or the investment objectives have changed, the Trustees may review the fund and consider whether to terminate the mandate, along with reviewing the annual management charge levied by the manager. The remuneration for investment managers used by the Scheme is based on assets under management.	The Trustees' policy on performance evaluation and investment manager remuneration was added during the year to reflect the new requirements. To evaluate performance in respect of the investment managers, the Trustees received and discussed investment reports from the investment consultant on a quarterly basis. The investment managers are remunerated by way of a fee, calculated as a percentage of assets under management.
10	**Monitoring portfolio turnover costs**	9.1. D. The Trustees receive MiFID II reporting from their investment managers but do not analyse the information. The Trustees do not currently monitor portfolio turnover costs in the DB section but may look to do so in the future.	The Trustees' policy on monitoring portfolio turnover costs was added during the year to reflect the new requirements. The Trustees do not currently monitor portfolio turnover costs across all asset classes but may look to do this in future.
11	**The duration of the arrangement with the investment manager**	9.1. E. The Trustees are long-term investors and are not looking to change the investment arrangements on a frequent basis. The funds invested in are open-ended funds and therefore there is no set duration for the manager appointments. In the	The Trustees' policy on the duration of an investment manager's appointment was added during the year to reflect the new requirements. Investment managers are aware that their continued appointment is based on their success in delivering the mandate for which they have been appointed to manage.

Policy	Relevant section / policy in the SIP	How the policy has been met over the year to 31 March 2021
	DB section, the Trustees will retain an investment manager unless: • There is a strategic change to the overall strategy that no longer requires exposure to that asset class or manager; • The manager appointment has been reviewed and the trustees have decided to terminate it.	There have been no changes in managers over the last 12 months. There remains no set duration for the funds used by the Scheme.

ESG Stewardship and Climate Change

	Policy	Relevant section / policy in the SIP	How the policy has been met over the year to 31 March 2021
12	**Undertaking engagement activities in respect of the investments** (including the methods by which, and the circumstances under which, the trustees would monitor and engage with relevant persons about relevant matters)	8.0. As part of the Trustees' ongoing review of their investment managers, they will review how ESG, climate change and stewardship are integrated within the investment managers' investment processes and in the monitoring process. The managers are expected to provide reporting on a regular basis, at least annually, on ESG integration progress, stewardship monitoring results, and climate-related metrics. The Trustees will consider the ESG policies of any potential new manager as part of any selection process.	During the year, the investment consultant kept the Trustees abreast of any changes to the investment manager ratings (both on the management of the strategy and the ESG ratings, which represent the extent to which ESG considerations and stewardship are embedded in the managers' investment process). The Trustees reviewed the quarterly investment performance reports, produced by the Scheme's investment consultant, which included manager ratings (both general investment capabilities and ESG specific). The majority of the funds employed by the Scheme remained highly rated during the year, although the Trustees recognise there are other managers in each of the underlying strategies' universes which may have a higher rating. Where managers may not be highly rated from an ESG perspective, the Trustees have noted the reasons with the investment consultant. As at the end of the reporting period, the Scheme's strategies were assigned the following ESG ratings by the investment consultant (with ESG4 and ESG1 being the lowest and highest possible scores, respectively): • UBS Overseas Equities (passive): ESG2 • UBS Fundamental Indexation (passive): no rating assigned by Mercer. • BlackRock Diversified Growth: ESG3 • Janus Henderson Multi Asset Credit: ESG2 • Nuveen UK Property: no rating assigned by Mercer. • Janus Henderson Bonds: ESG3 • BlackRock Buy and Maintain: ESG2 The Trustees also requested details of relevant engagement and voting activity for the year. Overall, based on this information, the Trustees believe that the investment managers are voting responsibly on their behalf and in line with the Trustees' investment beliefs.

Voting Disclosures

	Policy	Relevant section / policy in the SIP	How the policy has been met over the year to 31 March 2021
13	**The exercise of the rights (including voting rights) attaching to the investments**	8.0. The Trustees have given the investment managers full discretion when evaluating ESG issues and in exercising rights and stewardship obligations attached to the Scheme's investments. These investment managers are expected to evaluate ESG factors, including climate change considerations, and exercise voting rights and stewardship obligations attached to the investments, in accordance with their own corporate governance policies and current best practice, including the UK Corporate Governance Code and UK Stewardship Code.	The Trustees have delegated their voting rights to the investment managers and expect their investment managers to engage with investee companies on their behalf. There was no change in this policy during the year and the policy reflects current practice. The Trustees have requested information about key voting activities from their managers during the Scheme year. The information received is summarised in the voting section that follows. Additionally, the Scheme's investment managers engaged with companies over the period under review on a wide range of different issues, including ESG matters. This included engaging with companies on climate change to ensure that investee companies are making progress in this area and better aligning themselves with the wider objectives on climate change in the economy (e.g. those linked to the Paris agreement). The investment managers provided examples of instances where they had engaged with companies they were invested in or about to invest in which resulted in a positive outcome. These engagement initiatives are driven mainly through regular engagement meetings with the companies that the investment managers invest in or by voting on key climate-related resolutions at companies' Annual General Meetings.

Engagement Policy Statement

Establishing beliefs and policies

Section 8 of the SIP sets out the Trustees' policy on ESG factors, stewardship and climate change. This includes the Trustees' beliefs on ESG and climate change and the processes followed by the Trustees in relation to voting rights and stewardship.

Following the DWP's requirements, which came into force on 1 October 2019, the Trustees reviewed and updated the SIP setting out how they take account of financially material considerations, including Environmental, Social and Governance (ESG) considerations, and explicitly climate change. In addition, in line with the requirements, the SIP also includes the approach to the stewardship of the investments and how the Trustees take account (if at all) of member views on 'non-financial matters'.

Ultimately, the Trustees have delegated their voting rights to the investment managers. The SIP states *"The Trustees have given the investment managers full discretion when evaluating ESG issues and in exercising rights and stewardship obligations attached to the Scheme's investments. These investment managers are expected to evaluate ESG factors, including climate change considerations, and exercise voting rights and stewardship obligations attached to the investments, in accordance with their own corporate governance policies and current best practice, including the UK Corporate Governance Code and UK Stewardship Code".*

There were no material changes to the beliefs or the policies during the Scheme year covered by this statement. It is the Trustees' view that the policy has been followed during the Scheme year.

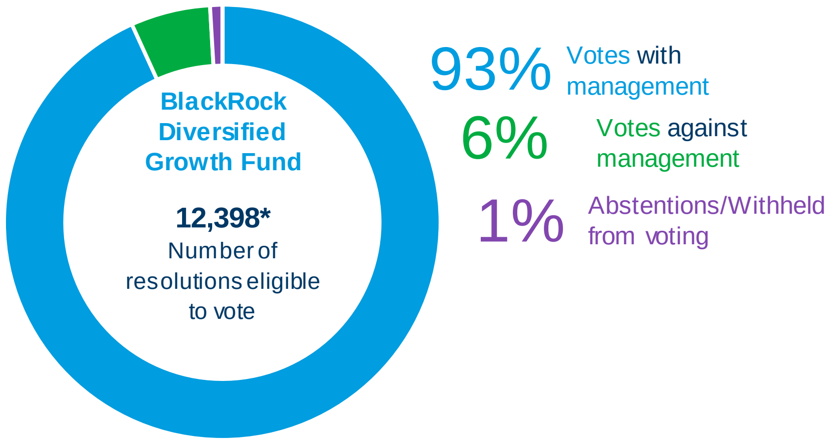
Over the prior 12 months, the Trustees have not actively challenged the manager on its voting activity. The Trustees do not use the direct services of a proxy voter. The underlying managers' use of proxy voting is detailed later in this statement.

Voting activity during the year

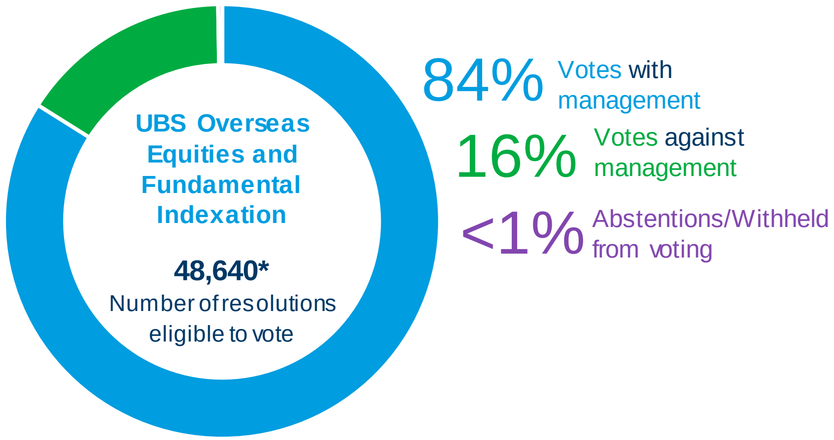
The majority of voting activity will arise in public equity funds. However, voting opportunities may arise in other asset classes such as certain bonds, property, private equity and multi-asset funds. The Trustees have received information relating to public equity funds and equities held within the BlackRock diversified growth fund during the period.

Voting activity information from each of the underlying investment managers (where provided) over the prior 12 months to 31 March 2021 is summarised in the pages that follow. Where fund managers have not been included this is due to information not being available at the time of finalising this report.

We have been supplied with the following voting activity for the funds used by the Scheme.



*97% of resolutions voted on



*97% of resolutions voted on

Source: Investment Managers.

Use of proxy voting by the manager

The table below sets out the use of proxy voting by investment managers.

Manager	Use of proxy voting
BlackRock	BlackRock's proxy voting process is led by the BlackRock Investment Stewardship team, which consists of three regional teams – Americas, Asia-Pacific, and Europe, Middle East and Africa. The analysts within each team will generally determine how to vote at the meetings of the companies they cover. Voting decisions are made by members of the BlackRock Investment Stewardship team with input from investment colleagues as required, in each case, in accordance with BlackRock's Global Corporate Governance and Engagement Principles and custom market-specific voting guidelines. BlackRock subscribes to research from the proxy advisory firms Institutional Shareholder Services (ISS) and Glass Lewis, as one among many inputs into their vote analysis process, and BlackRock state they do not blindly follow their recommendations on how to vote. BlackRock primarily use proxy research firms to synthesise corporate governance information and analysis into a concise, easily reviewable format so that their investment stewardship analysts can readily identify and prioritise those companies where their own additional research and engagement would be beneficial, to manage client accounts in relation to voting and facilitate client reporting on voting. Other sources of information include the company's own reporting, engagement and voting history with the company, and the views of its active investors, public information and ESG research.
UBS	UBS's proxy voting process is supported by a third-party proxy advisor, Institutional Shareholder Services ('ISS'). ISS is responsible for issuing voting recommendations to UBS based on the investment manager internal proxy voting policy. UBS uses the research and recommendations provided to supplement the assessments undertaken by their stewardship team; UBS does not delegate the voting responsibilities to ISS and retains full discretion when determining how to vote for shares held for clients and funds.

Source: Investment Managers.

Sample of signficant votes

The Trustees have been provided with the ‘most significant votes’ for the BlackRock and UBS funds with exposure to equities. There is no official definition of what constitutes a significant vote; managers have adopted a variety of interpretations such as:

- There is a particular interest in a specific vote relating to an issue,
- The potential impact on the financial outcome,
- Size of the holding in the fund / mandate, and
- Whether the vote was high-profile or controversial.

Below we present each manager’s interpretation of a ‘significant vote’ and a selection of examples for each.

BlackRock (Diversified Growth Fund)

Process for determining the most-significant votes

The BlackRock Investment Stewardship (“BIS”) team prioritises its work around themes that they believe will encourage sound governance practices and deliver sustainable long-term financial performance at the companies in which BlackRock invests on behalf of their clients. BlackRock’s year-round engagements with clients, to understand their focus areas and expectations, as well as BlackRock’s active participation in market-wide policy debates, help inform these priorities. The themes identified are reflected in the global principles, market-specific voting guidelines and engagement priorities, which underpin their stewardship activities and form the benchmark against which the sustainable long-term financial performance of investee companies is looked at.

Significant votes undertaken by BlackRock in relation to the equity holdings for the 12 months to 31 March 2021

BlackRock publishes “vote bulletins” on key votes at shareholder meetings to provide insight into certain vote decisions that expect to be of particular interest to clients. These bulletins are intended to explain BlackRock’s vote decisions relating to a range of business issues including environmental, social, and governance matters that it considered, based on BlackRock’s global principles and engagement priorities, material to a company’s sustainable long-term financial performance.

BlackRock has provided a list of the 10 most significant votes over the period. The summary of these and other resolutions are publicly shared in the manager’s website. The most significant included votes on resolutions for the following companies.

Company	Date of Vote	How BlackRock voted
Woodside Petroleum Ltd.	30 April 2020	Voted against a special resolution to amend the company constitution and against ordinary resolutions on Paris goals and targets, climate-related lobbying, and on reputation advertising activities.
Air Liquide SA	5 May 2020	Voted against the re-election of one Director due to the company's lack of progress on climate-related reporting in alignment with the TCFD recommendations.
Barclays plc	7 May 2020	Voted for the approval of Barclay's commitment to tackling climate change (proposed by management).
Cheniere Energy, Inc.	14 May 2020	Voted against the re-election of a couple of Directors for insufficient progress on climate reporting, and over-boarding. Also voted against the shareholder proposal (to report on plans to address stranded carbon asset risks) as BlackRock viewed it as too prescriptive.
Amazon.com, Inc.	27 May 2020	Voted for all management proposals and against all 12 shareholder proposals. After review of the company's existing disclosures, along with insights gleaned from multiple engagements, BlackRock determined that Amazon is actively addressing the material issues raised by the various shareholder proposals. Some of the proposals were too prescriptive in their request for additional information, such as requesting an alternative report on gender/racial pay in addition to the one the company already publishes and a specific supply chain report format beyond the report currently available on the company's website specifically addressing human rights. For a subset of the proposals, including the request for a report on customer use of certain technologies, such are Rekognition, and an additional report on lobbying, the company is already meeting the best practices guidelines.
Chevron Corporation	27 May 2020	Voted for the report on Climate Lobbying Aligned with Paris Agreement Goals.
Facebook, Inc.	27 May 2020	Voted against the election of one Director as he served on the Audit Committee and was not considered independent by the manager. In the same meeting, BlackRock voted for the shareholder proposal asking for a recapitalisation plan as the manager generally support one-share one-vote capital structures.
Alphabet, Inc.	3 June 2020	Voted against the election of one Director due to excessive board commitments. Voted for the shareholder proposal asking for the recapitalisation plan as BlackRock generally supports one-share one-vote capital structures.
Daimler AG	8 July 2020	Voted against all key resolutions outlined for the meeting given concerns related to the progress on climate-related risk reporting, the external mandates held by the proposed Supervisory Board member, and the reduction in shareholder rights from the proposed article amendment.
The Procter & Gamble Company	13 October 2020	Voted for the shareholder proposal on deforestation (report on efforts to eliminate deforestation) and against the shareholder proposal requesting the publication of a report assessing the company's diversity and inclusion efforts. In BlackRock's assessment, the longstanding, multi-pronged initiatives, along with robust disclosures, place P&G at the forefront of DEI efforts in the market. As a result, BlackRock determined that the requested report would be redundant and therefore did not support it.

Source: BlackRock

UBS (Overseas Equities and Fundamental Indexation)

Process for determining the most-significant votes

For the purposes of reporting in accordance with guidelines issued by the Pensions and Lifetime Savings Association (PLSA), UBS regarded a significant vote as one where a company received a large vote against a management proposal from all shareholders in aggregate, and where UBS has chosen not to support management.

Significant votes undertaken by UBS in relation to the equity holdings for the 12 months to 31 March 2021

UBS has provided a list of the 7 most significant votes over the period. The summary of these and other resolutions are publicly shared in the manager's website. The most significant included votes in resolutions with the following companies.

Company	Date of Vote	How BlackRock voted
Pearson Plc	24 April 2020	Voted against the re-election of Michael Lynton as Director as the nominee held significant number of positions on the boards of listed companies, raising concerns over his ability to commit sufficient time to the role.
Barclays Plc	7 May 2020	Voted with management to approve Barclays' commitment in tackling climate change as the company has made specific commitments in order to meet the requirements outlined in a separate shareholder proposal.
AMP Ltd.	8 May 2020	Voted against management on the remuneration report, as the executive pay vested during the year was not aligned with performance.
Exxon Mobil Corporation	27 May 2020	Voted against electing board chair and director, Darren W. Woods, as the company has not shown sufficient progress against UBS's defined climate related engagement objectives.
Amazon.com, Inc.	27 May 2020	Voted against management on the human rights risk assessment, as UBS is supportive of resolutions seeking reporting on such issues, subject to the condition these are not overly demanding or beyond the remit of the company's reporting.
Chevron Corporation	27 May 2020	Voted against management on climate lobbying aligned with Paris Agreement goals. UBS requires the issuer to report information concerning the company's potential liability from operations that contribute to global warming, the company goals in reducing these emissions and the company policy on climate risks with specific reduction targets.
Tesco Plc	26 June 2020	Voted against management on the retrospective amendments of the vesting conditions of executive incentive plans.

Source: UBS