Implementation Statement for the H + H Celcon Pension Fund
6 April 2020 – 5 April 2021

1. Background

The Trustee of the H+H Celcon Pension Fund ("the Fund") is required to produce a yearly statement to set out how, and the extent to which, the Trustee has followed the Fund's Statement of Investment Principles ("SIP") during the previous Fund year. This statement also includes the details of any reviews of the SIP during the year, any changes that were made and reasons for the changes. This is the first implementation statement produced by the Trustee.

A description of the voting behaviour during the year, either by or on behalf of the Trustee, or if a proxy voter was used, also needs to be included within this statement.

This statement should be read in conjunction with the SIP and has been produced in accordance with **The Pension Protection Fund (Pensionable Service) and Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018** and the subsequent amendment in **The Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019**.

A copy of the most recent SIP can be found online at:

https://www.hhcelcon.co.uk/sites/default/files/attachments/H%2BH%20-%20SIP%20-%20September%202020%20Final_.pdf

2. Investment Objectives and activity

The Trustees are required to invest the Fund's assets in the best interest of members, and their main objectives with regard to investment policy are:

- To achieve, over the long term, a return on the Fund's assets which is sufficient (in conjunction with the plan's existing contributions) to pay all members' benefits in full.
- Consistent with the assumptions made by the Scheme Actuary in determining the funding of the Fund.
- To ensure that sufficiently liquid assets are available to meet benefit payments as they fall due.
- To consider the interests of the Employer in relation to the size and volatility of the Employer's contribution requirements.

No formal manager selection or strategy decisions were made during the last Fund year.

The SIP was fully reviewed and updated during the period (September 2020) to incorporate the Trustee's policy on Environmental, Social and Governance ("ESG") factors, stewardship and climate change, as required under new regulations.

3. ESG, Stewardship and Climate Change

The Fund's SIP includes the Trustee's policy on Environmental, Social and Governance ("ESG") factors, stewardship and climate change. This policy sets out the Trustee's beliefs on ESG and climate change, and the processes followed by the Trustee in relation to voting rights and stewardship.

The Trustee will review these further in the next Fund year and provide information in the next implementation statement. The Trustee also intends to review the investment managers' ESG policies including the application of voting rights in the next Fund year.

4. Voting and Engagement

The Trustee is keen that its managers are signatories to the UK Stewardship Code, which they are.

All of the Trustee's holdings are within pooled funds and the Trustee has delegated to their investment managers the exercise of voting rights. Therefore, the Trustee is not able to direct how votes are exercised and the Trustee has not used proxy voting services over the year.

The Fund is invested in the following funds:

- L&G Matching Core Fixed Long Fund
- L&G Matching Core Real Fund
- L&G Dynamic Diversified Fund
- BlackRock Dynamic Diversified Fund
- Newton Real Return Fund

The Trustee was unable to include voting data for some of the pooled funds (L&G Matching Core Fixed Long Fund, L&G Matching Core Real Fund) due to the funds not holding physical equities, however they will continue to work with their advisers and investment managers with the aim of providing more information in future statements.

a. Description of investment manager's voting processes

LGIM

LGIM describe their voting process as follows:

"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.

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.

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.

It is vital that 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 our expectations, an analysis of any issues we 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.”

BlackRock

BlackRock votes annually at approximately 16,000 shareholder meetings, taking a case-by-case approach to the items put to a shareholder vote. BlackRock’s analysis is informed by BlackRock’s internally developed proxy voting guidelines, BlackRock’s pre-vote engagements, research, and the situational factors at a particular company. BlackRock aims to vote at all shareholder meetings of companies in which BlackRock’s clients are invested. In cases where there are significant obstacles to voting, such as share blocking or requirements for a power of attorney, BlackRock will review the resolutions to assess the extent of the restrictions on voting against the potential benefits. BlackRock generally prefer to engage with the company in the first instance where BlackRock have concerns and give management time to address the issue. BlackRock will vote in favour of proposals where BlackRock support the approach taken by a company’s management or where BlackRock have engaged on matters of concern and anticipate management will address them. BlackRock will vote against management proposals where BlackRock believe the board or management may not have adequately acted to and advance the interests of long-term investors. BlackRock ordinarily refrain from abstaining from both management and shareholder proposals, unless abstaining is the valid vote option (in accordance with company by-laws) for voting against management, there is a lack of disclosure regarding the proposal to be voted, or an abstention is the only way to implement BlackRock's voting intention. In all situations the economic interests of BlackRock's clients will be paramount. BlackRock's voting guidelines are intended to help clients and companies understand BlackRock's thinking on key governance matters. They are the benchmark against which BlackRock assess a company's approach to corporate governance and the items on the agenda to be voted on at the shareholder meeting. BlackRock apply BlackRock's guidelines pragmatically, taking into account a company's unique circumstances where relevant. BlackRock inform BlackRock's vote decisions through research and engage as necessary. BlackRock review BlackRock's voting guidelines annually and update them as necessary to reflect changes in market standards, evolving governance practice and insights gained from engagement over the prior year.

Newton

Newton (also known as BNY Mellon) describe their voting process as follows:

"Our head of responsible investment (RI) is responsible for the decision-making process of the RI team when reviewing meeting resolutions for contentious issues. We do not maintain a strict proxy voting policy. Instead, we prefer to take into account a company's individual circumstances, our investment rationale and any engagement activities together with relevant governing laws, guidelines and best practices.

Contentious issues may be referred to the appropriate industry analyst for comment and, where relevant, we may confer with the company or other interested parties for further clarification or to reach a compromise or to achieve a commitment from the company.

Voting decisions are approved by either the deputy chief investment officer or a senior investment team member (such as the head of global research). For the avoidance of doubt, all voting decisions are made by Newton.

It is only in the event of a material potential conflict of interest between Newton, the investee company and/or a client that the recommendations of the voting service used (Institutional Shareholder Services, or the ISS) will take precedence.

It is also only in these circumstances when we may register an abstention given our stance of either voting in favour or against any proposed resolutions. The discipline of having to reach a position of voting in favour or against management ensures we do not provide confusing messages to companies.

Research ahead of voting decisions; regional distinction
We employ a variety of research providers that aid us in the vote decision-making process, including proxy advisors such as ISS. We utilise ISS for the purpose of administering proxy voting, as well as its research reports on individual company meetings.

Voting decisions take into account local market best practice, rules and regulations while also supporting our investment rationale. For example, when voting on the election of directors in Japan, we are unlikely to vote against a board chair should the board not be majority independent given that only recently the corporate governance code has recommended boards appoint independent directors. However, in the UK, where majority independent boards are well established and expected by investors, we are likely to vote against the chair and non-independent directors. This being said, we frequently vote against executive pay at US companies despite it being accepted US market practice of granting significant awards of free shares as we believe executive pay should be aligned with performance."

b. Summary of voting behaviour over the year

LGIM

A summary of the investment managers' voting behaviour over the period is provided in the tables below:

	Summary Info
Manager name	Legal & General
Fund name	Dynamic Diversified Fund
Approximate value of trustee's assets	£20.4m
Number of equity holdings in the fund	3951
Number of meetings eligible to vote	7,887
Number of resolutions eligible to vote	83,262
% of resolutions voted	99.9%
% of resolutions voted with management	84.09%
% of resolutions voted against management	15.24%
% of resolutions abstained	0.68%
% of meetings with at least one vote against managements	5.41%
% of resolutions voted contrary to the proxy adviser recommendation	0.25%

BlackRock

	Summary Info
Manager name	BlackRock
Fund name	Dynamic Diversified Growth Fund
Approximate value of trustee's assets	£20.7m
Number of equity holdings in the fund	unavailable
Number of meetings eligible to vote	948
Number of resolutions eligible to vote	11,908
% of resolutions voted	99%
% of resolutions voted with management	94%
% of resolutions voted against management	5%
% of resolutions abstained	0%
% of meetings with at least one vote against managements	30%
% of resolutions voted contrary to the proxy adviser recommendation	0%

Newton

	Summary Info
Manager name	Newton Investment Management Limited
Fund name	BNY Mellon Real Return Fund
Approximate value of trustee's assets	£20.8m
Number of equity holdings in the fund	91
Number of meetings eligible to vote	98
Number of resolutions eligible to vote	1,307
% of resolutions voted	99.2%
% of resolutions voted with management	85.4%
% of resolutions voted against management	14.6%
% of resolutions abstained	0%
% of resolutions withheld	0%
% of meetings with at least one vote against managements	38%
% of resolutions voted contrary to the proxy adviser recommendation	9.9%

Please note that the voting data for Newton is as at 31 March 2021

c. Most significant votes over the year

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. LGIM also believe public transparency of their vote activity is critical for their clients and interested parties to hold LGIM 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'. LGIM 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 consultation (PLSA). 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 LGIM 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 5-year ESG priority engagement themes.

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

Given the similar holdings within each of the funds with their respective currency hedged version of the funds, significant votes cast in each fund were the same for both unhedged and hedged fund versions.

BlackRock

BlackRock Investment Stewardship prioritizes its work around themes that BlackRock believe will encourage sound governance practices and deliver sustainable long-term financial performance at the companies in which BlackRock invest on behalf of BlackRock's 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 BlackRock have identified are reflected in BlackRock's global principles, market-specific voting guidelines and engagement priorities, which underpin BlackRock's stewardship activities and form the benchmark against which BlackRock look at the sustainable long-term financial performance of investee companies.

BlackRock periodically publish "vote bulletins" on key votes at shareholder meetings to provide insight into certain vote decisions BlackRock expect will 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 BlackRock consider, based on BlackRock's global principles and engagement priorities, material to a company's sustainable long-term financial performance. Other factors BlackRock may consider in deciding to publish a vote bulletin include the profile of the issue in question, the level of interest BlackRock expect in the vote decision and the extent of engagement BlackRock have had with the company. The bulletins include relevant company-specific background, sector or local market context, and engagement history when applicable. BlackRock publish vote bulletins after the shareholder meeting to provide transparency for clients and other stakeholders on BlackRock's approach to the votes that BlackRock consider to be most significant and thus require more detailed explanation. BlackRock publish details of other significant votes (including vote rationales, where applicable) quarterly on the BlackRock website.

BlackRock's vote bulletins can be found here https://www.blackrock.com/corporate/about-us/investment-stewardship#engagement-and-voting-history

Newton

Newton (also known as BNY Mellon) define their process for determining the "most significant" votes as follows:

"We regard material issues as all votes against management, including where we support shareholder resolutions that the company's management are recommending voting against. As active managers, we invest in companies that we believe will support the long-term performance objectives of our clients. By doing so, we are making a positive statement about the business, the management of risks and the quality of management. Voting against management, therefore, is a strong statement that we think there are areas for improvement. As such, by not supporting management, we think that this is material, which is different to a passive investor where there is no automatic assumption of a positive intent in ownership. As such, we report publicly our rationale for each instance where we have voted against the recommendation of the underlying company's management. At the fund level, we consider each instance of voting against management to be significant but if required to prioritise these instances, we take an objective approach that includes the fund’s weighting in each security. This reflects our investment process and ensures the prioritised list includes those instances that could be most impactful to the long-term value to the fund as well as those that may have an immediate impact to the fund.”

LGIM

Company name	Amazon	Walgreens Boots Alliance, Inc.
Date of vote	27-May-20	28-Jan-21
Summary of the resolution	Shareholder resolutions 5 to 16	Resolution 3: Advisory vote to ratify named executive officer's compensation.
How you voted	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).	We voted against the resolution.
Where you voted against management, did you communicate your intent to the company ahead of the vote?	LGIM publicly communicates its vote instructions in monthly regional vote reports 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.	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.
Rationale for the voting decision	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: • Governance: Separation of CEO and board chair roles, plus the desire for directors to participate in engagement meetings • Environment: Details about the data transparency committed to in their 'Climate Pledge' • Social: Establishment of workplace culture, employee health and safety 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.	The company's compensation committee applied discretion to allow a long-term incentive plan award to vest when the company had not even achieved a threshold level of performance. This is an issue because investors expect pay and performance to be aligned. Exercising discretion in such a way during a year in which the company's earnings per share (EPS) declined by 88% caused a significant misalignment between pay and performance. LGIM had a constructive engagement with the company in November 2020; however, it failed to mention the application of discretion during that call. We found this surprising given the significant impact it had on compensation, which was discussed, giving the company an opportunity to raise this. LGIM does not generally support the application of retrospective changes to performance conditions. Although the company was impacted by COVID, many of its shops remained open as they were considered an essential retailer. The company did not provide sufficient justification for the level of discretion applied which resulted in the payment of 94,539 shares or approximately $3.5m to the CEO in respect of the 2018-2020 award, which would otherwise have resulted in zero shares vesting.
Outcome of the vote	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. Resolution 11 received 6.1% support. Resolution 12 received 1.5 % support. Resolution 13 received 12.2% support. (Source: ISS data)	The resolution failed to get a majority support as 52% of shareholders voted against.
Implications of the outcome eg were there any lessons learned and what likely future steps will you take in response to the outcome?	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.	LGIM will continue to monitor the company.
On which criteria (as explained in the cover email) have you assessed this vote to be "significant"?	The market attention was significant leading up to the AGM, with: •12 shareholder proposals on the table – the largest number of any major US company this proxy season •Diverse investor coalitions submitting and rallying behind the proposals, including global, different types of investors and first time co-filers/engagers •Substantial press coverage – with largely negative sentiment related to the company's governance profile and its initial management of COVID-19 •Multiple state treasurers speaking out and even holding an online targeted pre-annual meeting investor forum entitled 'Workplace & Investor Risks in Amazon.com, Inc.'s COVID-19 Response' Anecdotally, the Stewardship team received more inquires related to Amazon than any other company this season.	It was high-profile and controversial.

BlackRock

Company name	Barclays Plc	Woodside Petroleum Ltd.
Date of vote	7-May-20	30th April 2020
Summary of the resolution	Resolution 29: Approve Barclays' Commitment toTackling Climate Change Resolution 30: Approve ShareAction Requisitioned Resolution	Item 4a: Special Resolution to Amend the company Constitution Item 4b (1-3):Ordinary Resolution on Paris Goals and Targets Item 4c: Ordinary Resolution on Climate-Related Lobbying Item 4d: Ordinary Resolution on Reputation Advertising Activities
How you voted	BlackRock, through an independent fiduciary, voted FOR all management resolutions and AGAINST shareholder Resolution 30.	BIS voted with management and withheld support for the relevant proposals.
Where you voted against management, did you communicate your intent to the company ahead of the vote?	Information not provided	Information not provided
Rationale for the voting decision	Based on BlackRock's proxy voting guidelines, the independent fiduciary voted as follows: Resolution 29: Approve Barclays' Commitment to tackling Climate Change (FOR) Resolution 30:Approve ShareAction Requisitioned Resolution (AGAINST) The independent fiduciary reported that it took into consideration several factors when voting to support the company's own climate change resolution (Resolution 29) and against the shareholder resolution (Resolution 30). Support for both resolutions would have been problematic as they are both binding. The independent fiduciary determined that, as outlined in Resolution 29, the company sets a clear ambition to become net-zero and align to the goals of the Paris Agreement, addressing shareholders' concerns for the time being	Based on our evaluation, Woodside provides adequate transparency on their advertising activities and the community groups that they support. We recognize that there are a range of strongly held and differing views in the energy transition debate and maintain that all parties, including the company, are within their rights to state their views/engage in the discussion within OECD guidelines. Furthermore, based on our research, there is no indication that Woodside's sponsorships and community partnerships do not comply with relevant laws and the underlying principles of the OECD Guidelines for Multinational Enterprises.
Outcome of the vote	Resolution 29 - supported by 99.9% of shareholders Resolution30 - supported by 23.9% of shareholders (source: Company website)	
Implications of the outcome eg were there any lessons learned and what likely future steps will you take in response to the outcome?	Information not provided	We will continue to engage with the board and management of Woodside on a range of governance and material sustainability issues, including its long-term ambition for carbon neutrality. We will also monitor and provide feedback on the relevant disclosures and targets once published.
On which criteria (as explained in the cover email) have you assessed this vote to be "significant"?	Information not provided	Information not provided

Newton Real Return Fund

Company name	Mastercard Incorporated	NIKE, Inc.
Date of vote	16/06/2020	17/09/2020
Summary of the resolution	Advisory Vote to Ratify Named Executive Officers' Compensation, Elect Board Directors (members of the compensation committee), Ratify PricewaterhouseCoopers LLP as Auditors	Advisory Vote to Ratify Named Executive Officers'Compensation, Ratify PricewaterhouseCoopers LLP as Auditors and Report on Political Contributions Disclosure.
How you voted	AGAINST	AGAINST management proposals and FOR shareholder proposal
Where you voted against management, did you communicate your intent to the company ahead of the vote?	No	No
Rationale for the voting decision	Votes were instructed against the executive compensation structure and the members of the the compensation committee. We were concerned that a significant proportion of the long-term pay awards are subject only to time served and not performance. We also voted against the appointment of the auditor as it had been in place for 30 years which raised concerns surrounding independence.	We voted against management on a number of resolutions. We voted against the appointment of the external audit firm owing to it serving the company for 46 consecutive years. We believe this compromises independence and objectivity. Votes were also instructed against the ratification of the executive compensation arrangements. Our chief concern was that fewer than 50% of long-term pay awards were subject to the achievement of performance conditions. Finally, we supported a shareholder resolution requesting enhanced disclosures on political contributions. While the company's disclosures offer some insight into the contributions made and the governance framework surrounding this risk, we felt that the proposal would offer increased transparency of the company's relationships with trade associations and would bring its disclosures in line with better-performing peers.
Outcome of the vote	2.0%, 3.3%, 1.1%, 1.1%, 0.3% and 0.2% AGAINST compensation committee members; 3.7% AGAINST ratification of PwC; 4.5% AGAINST executive compensation	46% AGAINST Advisory Vote to Ratify Named Executive Officers' Compensation 3.6% AGAINST Ratify PricewaterhouseCoopers LLP as Auditors 34.4% FOR Report on Political Contributions Disclosure
Implications of the outcome eg were there any lessons learned and what likely future steps will you take in response to the outcome?	We did not consider the vote outcome on the pay resolutions to be material and of a level where the company is expected to address concerns. However, we expect domestic investors voting policies to change over time on this topic.	With close to a majority of shareholders voting against the executive pay practices, the company will need to conduct a fundamental review of its pay practices. In addition, the significant level of support for the company to improve its reporting of political contributions suggests that the company will also need to review its approach to this matter. We expect to encourage improvements through our voting decisions.
On which criteria (as explained in the cover email) have you assessed this vote to be "significant"?	The company's approach was a breach of the UK's corporate governance code, including the absence of an explanation justifying the move.	Only a few companies, globally, receive such a high level of shareholder dissent in relation to pay practices.