

IMPLEMENTATION STATEMENT
THE DAVIES LOSS ADJUSTERS LIMITED LIABILITY PARTNERSHIP LIFE ASSURANCE AND
PENSION SCHEME

1. Introduction

This is the Implementation Statement for The Davies Loss Adjusters Limited Liability Partnership Life Assurance and Pension Scheme ('the Scheme') and reflects the position as of 5th April 2023. The Implementation Statement (Statement) sets out the extent to which the Trustee has followed the voting and engagement policies in the Statement of Investment Principles (SIP). This Statement includes a description of the voting behaviour by and behalf of the Trustee. This Statement should be read in conjunction with the SIP.

The SIP was last updated in September 2019 and reflects the Trustee policies relating to responsible investment, including both financial and non-financial matters that the Trustee considered. This included Environmental, Social and Governance (ESG) considerations. Stewardship was also considered, i.e. voting and engagement, together with the ability of the Trustee to influence the actions of their investment managers. The SIP was reviewed in November 2022 following the latest Scheme Funding Report.

The selection of investment managers was considered including their objectives, fees, basis of charging and how that aligns with the interests of the Scheme to ensure there are no conflicts of interest. The duration of each manager appointment, the ability to terminate their appointment and any conditions of that termination were considered.

As a part of the investment review the sponsoring Employer was consulted on the content of the 2019 SIP and the investment strategy.

2. Investment Objective

This is effectively outlined in the SIP.

3. Investment Strategy

The Trustee continues to implement the strategy as outlined in the SIP.

4. Setting the Investment Arrangements

In managing the assets of the Scheme, the Trustee owns a policy of assurance. As the Grantee of the policy the Trustee has the benefit of the protection offered under the Financial Services Compensation Scheme (FSCS) and the terms of the specific policy of assurance.

Mobius Life

The Trustee holds a long term insurance policy with Mobius Life as a part of the Mobius Life long term business fund. As Grantee under the policy the Trustee may pay a premium to Mobius Life who will allocate units to the policy. The allocation of units is notional and references to both units and funds are solely for the purpose of calculating benefits under the policy. Neither the Grantee (which is the Trustee) nor any other person has any right or interest in the units, the funds or any other specific assets or income of Mobius Life by virtue of the policy.

The wide range of asset classes available to the Trustee was considered and the ease of access to institutional style investment management funds at an acceptable annual management charge. During the past 12 months the Trustee received information and advice on how to achieve their objectives and how to access appropriate investment funds in a secure way.

5. Implementation of the Investment Arrangements

The arrangements are assessed on an ongoing basis at Trustee meetings and by the Trustee's Investment Adviser. This may in part be by face to face meetings where it is practical to do so.

The Trustee is aware of the need to consider the impact of costs and value for money on the long-term performance of the investments in the pooled funds. To reduce cost and the risks associated with 'active' fund management, the Trustee has invested some of the Scheme's assets in passive or index funds.

The funds are accessed via the Mobius Life investment platform using a Trustee Investment Plan. This is technically a policy of assurance and can benefit from aggregation discounts on annual management charges. Reporting is coordinated and this represents a significant benefit to the Scheme.

6. Realisation of Investments

Investments are reviewed on a regular basis in the light of net cash flow requirements. The pooled funds may be accessed daily and the Trustee believes that this supplies adequate liquidity for the Scheme.

7. Investment Governance and Financially Material Considerations

The matter of investment and investment governance is taken seriously by those who manage the Scheme (the Trustee). To this end the Scheme has a Statement of Investment Principles (SIP). This is considered and reviewed periodically as appropriate.

The current SIP was agreed in 2019. The SIP follows an in depth consideration of the environmental, social and governance requirements, considering both financial and non-financial aspects, in respect to the asset types as required in the long term for the Scheme as it matures. The Scheme is investing appropriately against this background and there has not been a need to make further amendments although the Trustee has kept this position under review.

Those that manage the Scheme collectively have the necessary qualifications and appropriate experience for the size of the Scheme. The Trustee meets regularly as required by the business of the Scheme, including investment business. Investment matters are on the agenda for all Trustee regular meetings. The Scheme has access to professional advisers including, but not limited, to an Investment Adviser, Actuary, and Lawyer.

8. Approach to Non-Financial Matters

The Scheme invests in a policy of assurance that accesses pooled pension funds. This is appropriate to a Scheme of this size and brings added security in that the assets are covered by the Financial Services Compensation Scheme.

The Scheme will always prefer an investment that is beneficial to society and the environment over one that is not. In making such a statement the managers of the Scheme are noting that by using pooled investment vehicles they are not the direct owners of the underlying assets. They do however have access (sometimes limited by availability of information) to a copy of the content of the underlying portfolios of the pooled investment managers.

9. Strategic Asset Allocation

During the reporting year the Scheme has followed the asset allocation as outlined in the SIP. Where there has been any variation this has been intentional. Those that manage the Scheme continue to consider that the asset allocation is appropriate and have considered this at their meetings during the year.

10. Mandate Parameters

The Scheme has selected pooled pension funds with specific objectives. Each of the pooled funds that the Scheme is invested in has its own specific objective and in selecting these funds the manager of the Scheme received investment advice from a financial adviser of appropriate standing and experience and working for an organisation registered with the Financial Conduct Authority.

When reviewing the investments during the year it was noted that the pooled funds were being managed to their objectives and that the results were as the Scheme expected. The financial standing of the managers of the pooled funds has been considered and noted that it continues to be appropriate. The managers of the pooled funds that the Scheme participates in are required to report to the Prudential Regulatory Authority who in turn supervise the solvency of these managers on behalf of the Bank of England.

The Scheme has considered this position during the year and remains comfortable with the approach in place, including the capital structure and financial standing of the investment managers that the Scheme invests with. Specifically, the Trustee takes considerable comfort by investing in a policy of assurance and the protections that brings.

11. Voting Rights and Description of Voting Behaviour During the Year

Participants in pooled investment funds do not generally acquire rights over the underlying holdings of the pool. There is no direct relationship between the Scheme and the companies whose shares are held within the pooled investment funds. In effect this means that the manager of the pool exercises voting rights on the Trustee's behalf (as a participant in the pool) but without any obligation to consult with the Trustee. The Scheme does not use a proxy voting service, in practice it does not have the right to exercise votes at the general meetings of companies held within the pooled investment funds. Generally, other than for matters of financial reconstruction, holders of gilts, bonds, physical property and other alternative investments may not have voting rights.

Where the Scheme holds units of investment in pooled equity funds the Scheme can see how the manager has voted in the summary stewardship reports that the manager may produce for information. These matters are currently only reported at overall manager level and not in a specific way in respect to the funds that we invest in. This may change in the future and the Scheme is aware that there are many initiatives in the investment markets generally to improve access information and reporting in this area.

Other than via our investment consultant, it is challenging for the Scheme to influence the manager of a pooled fund on matters of voting for individual companies. The Trustee does however take their responsibilities seriously and note it always has the option to divest from the manager if, in the view of the Scheme and expressed by those who manage it, this is deemed appropriate. Set against this is, an overall fiduciary responsibility of the Trustee is the management of the Scheme assets.

In future years, the Trustee expects managers to provide further summary stewardship reports that highlight key voting issues, particularly around matters of diversity and the environment as regards the underlying holdings in the relevant pooled fund portfolio. Such reports are available for example from Legal and General at a high level by accessing:

https://www.lgim.com/landg-assets/lgim/_document-library/capabilities/lgim-uk-corporate-governance-and-responsible-investment-policy.pdf

Other managers that the Trustee may access have similar information published on the world wide web. The Trustee considers such information in making their decisions under the policy of assurance that they own.

12. The Trustee

At each trustee meeting the Trustee receives an investment presentation from the Investment Adviser on the strategy that they are pursuing and the pooled funds that they participate in. This has included some comment on ESG and where available the wider voting record of their investment manager.

The Trustee group includes experienced individuals with relevant qualifications and practical working experience of investment matters and governance. This method of operation facilitates an excellent understanding at Scheme level of the requirements when exercising 'good governance'.

13. Trustee Knowledge and Understanding

Winterbourne Trustee Services is a specialist professional Independent Trustee and is the sole trustee of the Scheme. As a firm of professional trustees, Winterbourne brings its long experience and specialist pensions knowledge to what is now a very complex and increasingly legislated area.

14. Processes around Managing Scheme Investments

Having set a strategic asset allocation this process has revolved mainly around managing the cash flow during the year. In this respect, where funds have been required for additional cashflow, retirements or member transfers, the Trustee has taken appropriate advice and sold investments to provide the necessary liquidity.

15. Holding Advisers and Managers to Account

The Scheme is managed by the Trustee and in turn take advice where required. Those that act as advisers to the Scheme have objectives to deliver a service and the Trustee group considers the success of this on an ongoing basis. The Investment Adviser has objectives in place that were reviewed in 2022.

No action has been necessary during this year in respect of shortcomings of advisers or service providers to the Scheme. The Trustee notes that the management of a Scheme such as this can be a challenging matter and that in particular budgets must be appropriate. These matters are regularly considered with assistance from the principal employer and the Trustee considers that overall the Scheme functions well, achieving good value from its service providers.

16. Manager Selection, Review and Monitoring

The Scheme has made no change in its holding of pooled funds during the year. This is intentional. Change can be relatively expensive due to implicit dealing costs in the underlying assets and although not fully transparent such costs are apparent in wholesale rearrangement of assets. The Trustee seeks to avoid such costs.

17. Transparency

The assets held by the Scheme are transparent and it is anticipated that in future years all transaction costs on the underlying assets of the pooled funds that the Scheme owns assets in will be available for general publication. For monetary instruments such as gilts and fixed interest holdings such costs are implicit in the purchase price of the underlying asset and so are unlikely to be available. The Trustee is aware that the investment industry is considering how to report on such matters and watch for more information in this area. Under the policy of assurance that the Trustee owns there is presently no right to require such information and the investment managers are not yet supplying such information.

18. Conclusion

The Scheme has managed its assets successfully throughout the period under review. This Implementation Statement should be read in conjunction with the SIP and is supported by ESG and voting information as supplied to the Investment Adviser for the Scheme by the managers of the pooled funds that the Scheme participates in.

19. Further Information

If further information is required on any of the matters covered in the Implementation Statement please contact the Trustee, Winterbourne Trustee Services or the Principal Employer.

September 2023

Appendix

LGIM Examples of significant votes

Set out below are some example governance stances taken by this fund manager

	VOTE 1	VOTE 2
Company name	Ninety One PLC	Twitter Inc
Date of vote	26-07-2022	13-09-2022
Summary of the resolution	Resolution 11: Approve Climate Strategy	Resolution 2: Advisory Vote on Golden Parachutes, lucrative settlement payments to top executives in the event that their employment is terminated
How you voted	Against	Against
Rationale for the voting decision	A vote against was applied as LGIM expects companies to introduce credible transition plans, consistent with the Paris goals of limiting the global average temperature increase to 1.5°C	As a long-term and engaged investor, LGIM entrusts the board to ensure executive directors' pay is fair, balanced and aligned with the strategy and long-term growth and performance of the business. It is also worth noting that in Twitter's 2022 AGM, we voted against their 'say on pay' proposal, as did 42% of shareholders, which is significant
Outcome of the vote	97.6% shareholder voted in favour of the resolution	4.8% shareholders voted against
Implications of the outcome e.g. were there any lessons learned and what future steps will you take in response to the outcome?	LGIM will continue to engage with our investee companies, publicly advocate their position on this issue and monitor company and market-level approach	It is also worth noting that in Twitter's 2022 AGM, LGIM voted against their 'say on pay' proposal, as did 42% of shareholders, which is significant
On which criteria have you assessed this vote to be "most significant"?	LGIM considers this vote significant as it is an escalation of climate related engagement	A vote against is applied as LGIM does not support the use of 'golden parachutes'