

Implementation Statement

The Free Church of Scotland Pension Scheme

This statement sets out the Trustee's approach to and implementation of the investment policies set out in the Statement of Investment Principles over the year.

How voting and engagement policies have been followed

The Scheme invests entirely in assets managed externally by Brewin Dolphin. The Trustee delegates responsibility for carrying out voting and engagement activities to the Scheme's fund manager and in turn any underlying pooled fund investment managers they choose to utilise.

Annually the Trustee undertakes a more thorough review of the stewardship and engagement activities of Brewin Dolphin to be satisfied their policies are reasonable. The Trustee also receives and reviews voting information and engagement policies from the asset manager to ensure alignment with the Scheme's own policies. This exercise is undertaken at the May meeting.

Having reviewed the above in accordance with the Scheme policies, the Trustee is comfortable the actions of the fund manager are in alignment with the Scheme's stewardship policies.

Voting Data

The Trustee's ESG policy leaves determining the key votes to their asset managers. Brewin Dolphin publish on their website details of their policies and how they have exercised voting rights. These are available at the links below:

www.brewin.co.uk/stewardship-policy

www.brewin.co.uk/sites/brewin-corp-v2/files/brewin-library/documents/uk-main/footer/uk/annual-engagement-report.pdf

How the SIP has been followed over the year

In the Trustee's opinion, the Statement of Investment Principles has been followed over the year in the following ways:

- The Investment Committee monitors Brewin Dolphin's performance on behalf of the Trustee to ensure that the funds are meeting their stated objectives. Brewin Dolphin provide quarterly reports for review. The underlying reasons for any deviation in performance from the stated objectives are highlighted and considered as part of the monitoring process. Where necessary, the Investment Committee will identify issues for the Trustee to consider further.
- The Trustee will regularly monitor any change in the ESG capabilities of the managers as part of their monitoring process.
- The Trustee has made no new asset manager appointments over the year that affect voting or engagement.