Engagement Policy Implementation Statement (“EPIS”)

The Sodexo Pension Fund (the “Fund”)

Fund Year End – 5 April 2025

The purpose of the EPIS is for us, the Trustee of the Sodexo Pension Fund, to explain what we have done during the year ending 5 April 2025 to achieve certain policies and objectives set out in the Statement of Investment Principles (“SIP”). It includes:

1. How our policies in the SIP about asset stewardship (including both voting and engagement activity) in relation to the Fund’s investments have been followed during the year; and

2. How we have exercised our voting rights or how these rights have been exercised on our behalf, including the use of any proxy voting advisory services, and the ‘most significant’ votes cast over the reporting year.

Our conclusion

Based on the activity we have undertaken during the year, we believe that the policies set out in the SIP have been implemented effectively.

In our view, most of the Fund’s material investment managers were able to disclose good evidence of voting and/or engagement activity. We believe that the activities the managers have completed align with our stewardship expectations, and that our voting policy has been implemented effectively.

How voting and engagement policies have been followed

The Fund is invested across a range of pooled funds, and so the responsibility for voting and engagement is delegated to the Fund's investment managers, which is in line with the policies set out in our SIP. We reviewed the stewardship activity of the material investment managers carried out over the Fund year and in our view, most of the investment managers were able to disclose good evidence of voting and engagement activity. More information on the stewardship activity carried out by the Fund's investment managers can be found in the following sections of this report.

Over the reporting year, we monitored the performance of the Fund's investments on a quarterly basis and received updates on important issues from our investment adviser, Aon Investments Limited ("AIL"). In particular, we received quarterly Environmental Social Governance ("ESG") ratings from AIL for the funds invested in where available.

During the year, we received training on ESG and stewardship topics, including those in relation to General Code of Practice, where we received a training session and completed an initial self-assessment. . AIL also provided the Trustee with a session on Carbon Emissions, the purpose of which was to provide the Trustee with a summary of the carbon intensity/emissions associated with the Fund's investments.

Each year, we review the voting and engagement policies of the Fund's investment managers to ensure they align with our own policies for the Fund and help us to achieve them.

The Fund's stewardship policy can be found in the SIP: https://www.isio.com/app/uploads/2025/02/SIP-February-2025-Website-Version.pdf

What is stewardship?

Stewardship is investors using their influence over current or potential investees/issuers, policy makers, service providers and other stakeholders to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society.

This includes prioritising which Environmental Social Governance ("ESG") issues to focus on, engaging with investees/issuers, and exercising voting rights.

Differing ownership structures means stewardship practices often differ between asset classes.

Source: UN PRI

Our managers' voting activity

Good asset stewardship means being aware and active on voting issues, corporate actions and other responsibilities tied to owning a company's stock. We believe that good stewardship is in the members' best interests to promote best practice and encourage investee companies to access opportunities, manage risk appropriately, and protect shareholders' interests. Understanding and monitoring the stewardship that investment managers practice in relation to the Fund's investments is an important factor in deciding whether a manager remains the right choice for the Fund.

Voting rights are attached to listed equity shares, including equities held in multi-asset funds. We expect the Fund's equity-owning investment managers to responsibly exercise their voting rights.

Why is voting important?

Voting is an essential tool for listed equity investors to communicate their views to a company and input into key business decisions. Resolutions proposed by shareholders increasingly relate to social and environmental issues.

Source: UN PRI

Voting statistics

The table below shows the voting statistics for each of the Fund's material funds with voting rights for the period 1 April 2024 to 31 March 2025 (as managers report to quarter ends). Managers collate voting information on a quarterly basis.

Funds	Number of resolutions eligible to vote on	% of resolutions voted	% of votes against management	% of votes abstained from
BlackRock - Aquila Life World (ex-UK) Currency Hedged Equity Index Fund	26,424	98.0%	5.0%	1.0%
BlackRock - Aquila Life World Fund	36,255	98.0%	4.0%	1.0%

Source: BlackRock. Please note that the 'abstain' votes noted above are a specific category of vote that has been cast and are distinct from a non-vote.

Use of proxy voting advisers

Many investment managers use proxy voting advisers to help them fulfil their stewardship duties. Proxy voting advisers provide recommendations to institutional investors on how to vote at shareholder meetings on issues such as climate change, executive pay and board composition. They can also provide voting execution, research, record keeping and other services.

Responsible investors will dedicate time and resources towards making their own informed decisions, rather than solely relying on their adviser's recommendations.

The table below describes how the Fund's equity-owning manager uses proxy voting advisers.

Why use a proxy voting adviser?

Outsourcing voting activities to proxy advisers enables managers that invest in thousands of companies to participate in many more votes than they would without their support.

Manager	Description of use of proxy voting adviser *(In the managers' own words)*
BlackRock	BlackRock Investment Stewardship leverages Institutional Shareholder Services (ISS) as an external proxy services vendor. ISS' electronic voting platform allows BlackRock Investment Stewardship to monitor voting activity, execute proxy vote instructions, record keep, and generate client and regulatory voting reports. BlackRock Investment Stewardship also uses Glass Lewis' services to support research and analysis. In addition to the global research provided by Institutional Shareholder Services (ISS) and Glass Lewis, BlackRock Investment Stewardship subscribes to market-specific research providers including Institutional Voting Information Service in the UK, Ownership Matters in Australia, Stakeholder Empowerment Services in India, and ZD Proxy in China.

Source: BlackRock

Significant voting examples

To illustrate the voting activity being carried out on our behalf, we asked the Fund's investment manager to provide a selection of what it considers to be the most significant votes in relation to the Fund's funds. A sample of these significant votes can be found in the appendix.

Our managers' engagement activity

Engagement is when an investor communicates with current (or potential) investee companies (or issuers) to improve their ESG practices, sustainability outcomes or public disclosure. Good engagement identifies relevant ESG issues, sets objectives, tracks results, maps escalation strategies and incorporates findings into investment decision-making.

The table below shows some of the engagement activity carried out by the Fund's material managers. The managers have provided information for the most recent calendar year available. Some of the information provided is at a firm-level i.e. is not necessarily specific to the funds invested in by the Fund.

Funds	**Number of engagements**		**Themes engaged on at a fund/firm level**
	Fund level	**Firm level**	
Apollo Global Management ("Apollo") - Credit Opportunities Fund III	116	*Not provided*	*Not provided*
BlackRock - Aquila Life World (ex-UK) Currency Hedged Equity Index Fund	1,575	3,384	Environment - Climate Risk Management; Other company impacts on the environment Social - Human Capital Management; Social Risks and Opportunities Governance - Corporate Strategy; Board Composition and Effectiveness; Remuneration
BlackRock - Aquila Life World Fund	3,254	3,384	Environment - Climate Risk Management; Water and Waste Social - Human and Labour Rights; Health and Safety Governance - Corporate Strategy; Board Composition and Effectiveness; Remuneration
Canyon Partners ("Canyon") - Distressed Opportunities Fund III	*Not provided*	10	Governance[1] - Remuneration; Shareholder Rights Strategy, Financial & Reporting* - Reporting; Financial Performance
Europa Capital - Fund VI & V	*Not provided* [2]	5[3]	*Not provided*
HSBC - Global Investment Grade Credit	*Not provided*	1,890	Environment[1] - Climate change; Pollution, Waste Social[1] - Conduct, culture and ethics; Human capital management Governance[1] - Board effectiveness; Leadership - Chair/CEO Strategy, Financial & Reporting* - Financial Performance; Capital Allocation
HarbourVest Partners ("HarbourVest") - HVP VIII, HVP XI & HIPEP VI Fund	*Not provided*		
Nuveen - Real Estate Debt	1	612	Environment[1] - Climate Change; Natural resources Social[1] - Diversity, equity & inclusion; Talent management Governance[1] - Business ethics; Executive compensation; Board quality
Oak Hill – Diversified Credit Fund	38	120	Environment – General environmental themes; GHG Emissions Social – General social themes, Diversity, equity & inclusion Governance – General governance themes Other - Promoting Disclosures

Source: Managers.

[1]*Canyon, HSBC and Nuveen did not provide fund level themes; themes provided are at a firm-level.*

[2]*Europa Capital did not provide fund level engagement numbers and themes in the expected format. Europa engages with all tenants of the Funds through its Annual Tenant Engagement Survey which reaches a broad tenant base. The survey focuses on sustainability, including energy reduction and air quality, and tenant desire for amenities.*

[3]*Europa Capital, at a firm-level, engaged with the Investors in Non-listed Real Estate Vehicles ("INREV") Research Committee, Sheffield Hallam University, Uptree Limited, Supporting Habit for Humanity, and the Urban Land Institute ("ULI") Sustainability Committee over the year.*

Data limitations

At the time of writing, the following managers did not provide all the information we requested:

- Apollo Global Management did not provide firm level number of engagements and themes engaged on at firm/fund level as they do not track this information for the credit platform.
- BlackRock did provide fund-level engagement information but not in the industry standard ICSWG template.
- Canyon and HSBC did not provide fund level engagement information.
- HarbourVest and Europa Capital did not provide the engagement information that we requested.

This report does not include commentary on the Fund’s investment in gilts or cash/liquidity funds because of the limited materiality of stewardship to these asset classes.

Appendix – Significant Voting Examples

In the table below are some significant vote examples provided by the Fund's equity-owning manager, BlackRock. We consider a significant vote to be one which the manager considers significant. Managers use a wide variety of criteria to determine what they consider a significant vote, some of which are outlined in the examples below, in the manager's own words:

BlackRock - Aquila Life World (ex-UK) Currency Hedged Equity Index Fund	**Company name**	Tesla, Inc.
	Date of vote	13 June 2024
	Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	Not provided
	Summary of the resolution	Adopt Simple Majority Vote
	How you voted?	Votes supporting resolution
	Where you voted against management, did you communicate your intent to the company ahead of the vote?	Not provided
	Rationale for the voting decision	Supermajority vote requirement serves as an entrenchment device for management.
	Outcome of the vote	Pass
	Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	Not provided
	On which criteria have you assessed this vote to be most significant?	Consistent with our historical support of both management and shareholder proposals related to these governance provisions, BlackRock Investment Stewardship (BIS) determined that support for this proposal was in our clients' financial interests as long-term shareholders.
BlackRock - Aquila Life World Fund	**Company name**	Amplifon SpA
	Date of vote	30 April 2024
	Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	Not provided
	Summary of the resolution	Amend Company Bylaws Re: Article 13
	How you voted?	Votes against resolution
	Where you voted against management, did you communicate your intent to the company ahead of the vote?	Not provided
	Rationale for the voting decision	On balance, we find that shareholders' rights are likely to be diminished in material ways under the new Charter/Articles/Bylaws.
	Outcome of the vote	Pass
	Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	Not provided
	On which criteria have you assessed this vote to be most significant?	BIS determined that support for this proposal would not protect our clients' fundamental rights as minority shareholders and was counter to their financial interests

Source: BlackRock