Crane Pension Scheme

Engagement Policy Implementation Statement for the year ending 5 April 2024

Introduction

The Trustee of the Crane Pension Scheme (the ‘Scheme’) has a fiduciary duty to consider its approach to the stewardship of the investments, to maximise financial returns for the benefit of members and beneficiaries over the long term. The Trustee can promote an investment’s long-term success through monitoring, engagement and/or voting, either directly or through their investment managers.

This statement sets out how, and the extent to which, in the opinion of the Trustee, the policies (set out in the Statement of Investment Principles) on the exercise of rights (including voting rights) attaching to the investments, and engagement activities have been followed during the year ending 5 April 2024. This statement also describes the voting behaviour by, or on behalf of, the Trustee.

The Trustee, in conjunction with its investment consultant, appoints its investment managers to meet specific Scheme policies. It expects that its investment managers make decisions based on assessments about the financial and non-financial performance of underlying investments (including environmental, social and governance (ESG) factors, and that they engage with issuers of debt or equity to improve their performance (and thereby the Scheme’s performance) over an appropriate time horizon.

The Trustee also expects its investment managers to take non-financial matters into account as long as the decision does not involve a risk of significant detriment to members’ financial interests.

Stewardship - monitoring and engagement

The Trustee recognises that investment managers’ ability to influence the companies in which they invest will depend on the nature of the investment.

The Trustee’s policy is to delegate responsibility for the exercising of rights (including voting rights) attaching to investments to the investment managers and to encourage the managers to exercise those rights. The investment managers are expected to provide regular reports for the Trustee detailing their voting activity.

The Trustee also delegates responsibility for engaging and monitoring investee companies to the investment managers and expects the investment managers to use their discretion to maximise financial returns for members and others over the long term.

As all of the investments are held in pooled vehicles, the Trustee does not envisage being directly involved with peer-to-peer engagement in investee companies.

Investment manager engagement policies

The Scheme's investment managers are expected to have developed and publicly disclosed an engagement policy. This policy, amongst other things, provides the Trustee with information on how the investment managers engage in dialogue with the companies it invests in and how it exercises voting rights. It also provides details on the investment approach taken by the investment manager when considering relevant factors of the investee companies, such as strategy, financial and non-financial performance and risk, and applicable social, environmental and corporate governance aspects.

Links to each investment manager's engagement policy or suitable alternative is provided in the Appendix.

The latest available information provided by the investment managers (for mandates that contain public equities or bonds) is as follows:

Engagement	LGIM World Equity Index Fund	LGIM Maturing B&M Credit 2020-2024	LGIM Maturing B&M Credit 2025-2029	LGIM Maturing B&M Credit 2030-2034	LGIM Maturing B&M Credit 2035-2039	Janus Henderson Multi-Asset Credit
Period	01/04/2023–31/03/2024	01/04/2023-31/03/2024	01/04/2023-31/03/2024	01/04/2023-31/03/2024	01/04/2023-31/03/2024	01/04/2023-31/03/2024
Engagement definition	Purposeful, targeted communication with an entity (e.g. company, government, industry body, regulator) on particular matters of concern with the goal of encouraging change at an individual issuer and/or the goal of addressing a market-wide or system risk (such as climate). Regular communication to gain information as part of ongoing research should not be counted as engagement.					
Number of companies engaged with over the year	426	28	72	66	43	35
Number of engagements over the year	676	62	152	118	82	49

Exercising rights and responsibilities

The Trustee recognises that different investment managers should not be expected to exercise stewardship in an identical way, or to the same intensity.

The investment managers are expected to disclose annually a general description of their voting behaviour, an explanation of the most significant votes cast and report on the use of proxy voting advisers.

The investment managers publish online the overall voting records of the firm on a regular basis.

All investment managers use proxy advisers for the purposes of providing research, advice or voting recommendations that relate to the exercise of voting rights.

The Trustee does not carry out a detailed review of the votes cast by or on behalf of their investment managers but relies on the requirement for its investment managers to provide a high-level analysis of their voting behaviour.

The Trustee considers the proportion of votes cast and the proportion of votes against management to be important (but not the only) considerations of investor behaviour.

The latest available information provided by the investment manager (for mandates that contain public equities) is as follows:

	LGIM World Equity Index Fund
Period	01/04/2023 – 31/03/2024
Number of meetings eligible to vote at	2,982
Number of resolutions eligible to vote on	37,017
Proportion of votes cast	99.9%
Proportion of votes for management	79.1%
Proportion of votes against management	20.8%
Proportion of resolutions abstained from voting on	0.1%

Trustee's assessment

The Trustee has undertaken a review of each investment manager's engagement policy including its policies in relation to financially material considerations.

The Trustee has considered the environmental, social and governance rating for each fund/investment manager provided by the investment consultant, which includes consideration of voting and/or engagement activities. This also includes those funds that do not hold listed equities.

The Trustee may also consider reports provided by other external ratings providers.

Where an investment manager has received a relatively low rating from the investment consultant or from other external rating providers, the Trustee will consider whether to engage with the investment manager.

The Trustee has reviewed the investment managers' policies relating to engagement and voting and how they have been implemented and have found them to be acceptable at the current time.

The Trustee recognises that engagement and voting policies, practices and reporting, will continue to evolve over time and are supportive of its investment managers being signatories to the United Nations' Principles for Responsible Investment and the Financial Reporting Council's UK Stewardship Code 2020.

Appendix

Links to the engagement policies for each of the investment managers can be found here:

Investment manager	Engagement policy
Legal & General Investment Management	https://www.lgim.com/landg-assets/lgim/_document-library/capabilities/lgim-engagement-policy.pdf
Janus Henderson	https://www.janushenderson.com/en-us/investor/about-us/esg-environmental-social-governance/
M&G	https://www.mandgplc.com/~/media/Files/M/MandG-Plc/documents/mandg-investments-policies/15-06-20-MandG-Shareholder-Rights-Directive-Engagement-Policy.pdf

Information on the most significant votes for each of the funds containing public equities is shown below.

LGIM World Equity Index Fund	Vote 1	Vote 2	Vote 3
Company name	Microsoft Corporation	Apple Inc.	Amazon.com, Inc.
Date of vote	7 December 2023	28 February 2024	24 May 2023
Approximate size of fund's holding (% of portfolio)	4.7%	4.2%	1.6%
Summary of the resolution	Resolution 1.06 - Elect Director Satya Nadella	Report on Risks of Omitting Viewpoint and Ideological Diversity from EEO Policy	Resolution 13 – Report on Median and Adjusted Gender/Racial Pay Gaps

How the fund manager voted	Against	Against Management	For (Against Management Recommendation)
Where the fund manager voted against management, did they communicate their intent to the company ahead of the vote	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is their policy not to engage with their investee companies in the three weeks prior to an AGM as their 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 their policy not to engage with their investee companies in the three weeks prior to an AGM as their engagement is not limited to shareholder meeting topics.	LGIM pre-declared its vote intention for this meeting on the LGIM Blog. As part of this process, a communication was set to the company ahead of the meeting.
Rationale for the voting decision	Joint Chair/CEO: A vote against is applied as LGIM expects companies to separate the roles of Chair and CEO due to risk management and oversight concerns.	Shareholder Resolution - Environmental and Social: A vote AGAINST this proposal is warranted, as the company appears to be providing shareholders with sufficient disclosure around its diversity and inclusion efforts and nondiscrimination policies, and including viewpoint and ideology in EEO policies does not appear to be a standard industry practice.	A vote in favour is applied as LGIM expects companies to disclose meaningful information on its gender pay gap and the initiatives it is applying to close any stated gap. This is an important disclosure so that investors can assess the progress of the company's diversity and inclusion initiatives. Board diversity is an engagement and voting issue, as LGIM believe cognitive diversity in business – the bringing together of people of different ages, experiences, genders, ethnicities, sexual orientations, and social and economic backgrounds – is a crucial step towards building a better company, economy and society.
Outcome of the vote	N/A	Fail	29% (Fail)

Implications of the outcome	LGIM will continue to engage with their investee companies, publicly advocate their position on this issue and monitor company and market-level progress.	LGIM will continue to engage with their investee companies, publicly advocate their position on this issue and monitor company and market-level progress.	LGIM will continue to engage with the company and monitor progress.
Criteria on which the vote is assessed to be "most significant"	Thematic - Board Leadership: LGIM considers this vote to be significant as it is in application of an escalation of their vote policy on the topic of the combination of the board chair and CEO.	Thematic - Diversity: LGIM views diversity as a financially material issue for their clients, with implications for the assets LGIM manage on their behalf.	Pre-declaration and Thematic – Diversity: LGIM views gender diversity as a financially material issue for their clients, with implications for the assets LGIM manage on their behalf.

Information on the most significant engagement case studies for each of the managers investing in public equities or bonds on the Scheme's behalf is shown below.

LGIM - Firm-level	**Case Study 1**	**Case Study 2**	**Case Study 3**
Name of entity engaged with	Aegon Ltd	Sainsbury's	Exxon Mobil
Topic	Governance	Social: Income inequality - living wage (diversity, equity and inclusion)	Environment: Climate change (Climate Impact Pledge)
Rationale	Following the disposal of Aegon Netherlands to ASR, Aegon no longer had insurance activities in the Netherlands. This transaction had transformed Aegon into an international insurance and asset management company. Since now over 99.5% of	With over 600 supermarkets, more than 800 convenience stores, and nearly 190,000 employees, Sainsbury's is the second largest supermarket in the UK. Although Sainsbury's is currently paying higher wages than many other listed	As one of the world's largest public oil and gas companies, LGIM believe that Exxon Mobil's climate policies, actions, disclosures and net zero transition plans have the potential for significant influence across the industry as a whole, and particularly in the US.

	Aegon's insurance businesses are not located in jurisdictions where Solvency II is the governing capital framework, Aegon made the decision to redomicile in Bermuda under the supervision of the Bermuda Supervision Authority (BMA). This required a vote by shareholders at an Extraordinary General Meeting on 30 September. While the business rationale was sound, the main concerns with this proposal for LGIM were that the new regulatory framework would adversely impacted shareholders rights, and potentially its capital position. The key issues included: 1) No pre-emptive rights for existing shareholders on the issuance of common shares; (2) No shareholder approval would be required for share buybacks; and (3) No shareholder approval would be required for annual final dividend payments, amongst other issues. Consequently, we decided to engage with Aegon management team	supermarkets, the company has been selected because it is more likely than many of its peers to be able to meet the requirements to become living-wage accredited. Ensuring companies take account of the 'employee voice' and that they are treating employees fairly in terms of pay and diversity and inclusion is an important aspect of our stewardship activities. As the cost of living ratchets up in the wake of the pandemic and amid soaring inflation in many parts of the world, our work on income inequality and our expectations of companies regarding the living wage have acquired a new level of urgency. As a responsible investor, LGIM advocates that all companies should ensure that they are paying their employees a living wage and that this requirement should also be extended to all firms with whom they do business across their Tier 1 and ideally Tier 2, supply chains.	At LGIM, they believe that company engagement is a crucial part of transitioning to a net zero economy by 2050. Under their Climate Impact Pledge, LGIM publish their minimum expectations for companies in 20 climate-critical sectors. LGIM select roughly 100 companies for 'in-depth' engagement - these companies are influential in their sectors, but in our view are not yet leaders on sustainability; by virtue of their influence, their improvements would be likely to have a knock-on effect on other companies within the sector, and in supply chains. Their in-depth engagement is focused on helping companies meet these minimum expectations, and understanding the hurdles they must overcome. For in-depth engagement companies, those which continue to lag our minimum expectations may be subject to voting sanctions and/ or divestment (from

	ahead of the EGM in order to highlight our concerns on the weakening of shareholder rights under the proposed redomicile and amendments to the Company's Articles of Incorporation. Given concerns amongst investors and third-party service providers, such as ISS, we sought to lend our voice to influence the proposals and push for enhanced shareholders rights ahead of the vote. Additionally, we wanted to better understand the impact of the new supervisory environment on the business to ensure that it would not adversely impact both creditors and shareholders.	LGIM expect the company board to challenge decisions to pay employees less than the living wage. LGIM ask the remuneration committee, when considering remuneration for executive directors, to consider the remuneration policy adopted for all employees. During the pandemic, LGIM went a step further by tightening our criteria of bonus payments to executives at companies where COVID-19 had resulted in mass employee lay-offs and the company had claimed financial assistance (such as participating in government-supported furlough schemes) in order to remain a going concern. UN SDG 1: No poverty and SDG 8: Decent work and economic growth	LGIM funds which apply the Climate Impact Pledge exclusions). Their Climate Impact Pledge 'red lines' for the oil & gas sector are: - Has the company committed to net-zero operational emissions? - Does the company have time-bound methane reduction/zero flaring targets? - Does the company disclose its climate-related lobbying activities, including trade association memberships, and explain the action it will take if these are not aligned with a 1.5°C scenario? UN SDG 13: Climate action
What the investment manager has done	LGIM were in touch with Aegon's Investor Relations team in early September ahead of a planned meeting with the CEO	LGIM engaged initially with the company's [then] CEO in 2016 about this issue and by 2021, Sainsbury's was paying a real	LGIM have been engaging with Exxon Mobil since 2016 and they have, over time, participated willingly in their discussions

	and management team at a roadshow in the US. LGIM noted their initial concerns with some of the proposed changes to the Company's Articles of Incorporation following the redomicile to a lower shareholder rights jurisdiction. This concern was also picked up by the main proxy advisory firms, ISS and Glass Lewis, who recommended negatively in respect of the proposed move. Following engagement on 14 September, Aegon announced amended proposals on 15 September, that now provided for enhanced shareholder rights to more closely align with provisions previously in place, especially around capital management authorities. LGIM also met with Aegon's CEO on 18 September. Given the importance of the vote on the Company's business performance, but potential negative effects on shareholder and creditor rights, the meeting was attended by the investment	living wage to all employees, except those in outer London. LGIM joined forces with ShareAction to try to encourage the company to change its policy for outer London workers. As these engagements failed to deliver change, LGIM then joined ShareAction in co-filing a shareholder resolution in Q1 2022, asking the company to becoming a living wage accredited employer. This escalation succeeded insofar as, in April 2022, Sainsbury’s moved all its London-based employees to the real living wage. We welcomed this development as it demonstrates Sainsbury’s values as a responsible employer. However, the shareholder resolution was not withdrawn and remained on the 2022 AGM agenda because, despite this expansion of the real living wage to more employees, contractors, i.e. cleaners and security guards, operating within Sainsbury's operations were	and meetings. Under our Climate Impact Pledge, LGIM identified a number of initial areas for concern, namely: lack of Scope 3 emissions disclosures (embedded in sold products); lack if integration or a comprehensive net zero commitment; lack of ambition in operational reductions targets and; lack of disclosure of climate lobbying activities. Levels of individual typically engaged with include the Head of Sustainability, Lead Independent Director, the Company Secretary and Investors Relations. LGIM’s regular engagements with Exxon Mobil have focused on their expectations under the Climate Impact Pledge, as well as several other material issues for the company, including capital allocation and business resiliency. The improvements made have not so far been sufficient in their opinion, which has resulted in escalations. The first escalation was to vote against the re-election of the Chair, from 2019, in line with their

	stewardship team as well as credit analysts both in London and the US. There was another follow-up meeting with the CEO only two days later, where changes to the proposals were discussed.	excluded from the uplift. In the previous four years LGIM have held eight company meetings with Sainsburys, with the continued focus on social inequality, whilst also covering broader topics such as capital management and biodiversity. They met with the CEO as well as the Chairman. In 2023, LGIM led its own campaign on income inequality where we targeted the largest global food retailers. Sainsbury's is one of the 15 companies we are targeting. The campaign has as a consequence, a vote against the Chairman if our minimum requirements are not met by the time of their AGM in 2025.	Climate Impact Pledge sanctions. Subsequently, in the absence of further improvements, LGIM placed Exxon Mobil on our Climate Impact Pledge divestment list (for applicable LGIM funds) in 2021, as they considered the steps taken by the company so far to be insufficient for a firm of its scale and stature. Nevertheless, our engagement with the company continues. In terms of further voting activity, in 2022 LGIM supported two climate-related shareholder resolutions (i.e. voted against management recommendation) at Exxon's AGM, reflecting their continued wish for the company to take sufficient action on climate change in line with our minimum expectations. Further escalating our engagement, LGIMA and CBIS co-filed a shareholder resolution at Exxon’s 2023 AGM, requesting the company to disclose the quantitative impact of the IEA NZ scenario on all asset retirement obligations (AROs). The proposal was centred around

			disclosure and seeking greater insight into the potential costs associated with the decommissioning of Exxon's assets in the event of an accelerated energy transition. LGIM believe this is a fundamental level of information for the company's shareholders, in light of growing investor concerns about asset retirement obligations (AROs) in a carbon constrained future, and that it is financially material information. The proposal received over 16% support from shareholders which, although lower than LGIM would have liked, demonstrates an increasing recognition of the importance of this issue for investors.
Outcomes and next steps	With pressure applied on the Company by both investors and proxy advisers, LGIM were able to push for improved shareholder rights and amended terms ahead of the	Since LGIM co-filed the shareholder resolution in 2022, Sainsbury's has made three further pay increases to its directly employed workers, harmonising inner and outer London pay and is	Since 2021, LGIM have seen notable improvements from Exxon Mobil regarding their key engagement requests, including disclosure of Scope 3 emissions, a 'net zero by 2050' commitment

	vote taking place at the EGM. Both ISS and Glass Lewis changed their vote recommendations on the proposal upon the announcement on 15 September by the Company of changed terms and commitments, and LGIM felt comfortable to support all resolutions at the EGM. The redomicile of Aegon was overwhelmingly approved by shareholders with 98.7% of shares voted in favour.	now paying the real living wage to its employees, as well as extending free food to workers well into 2023. LGIM welcome these actions which demonstrate the value the board places on its workforce. LGIM continue to engage with Sainsburys and have asked the board to collaborate with other key industry stakeholders to bring about a living wage for contracted staff. While the company may have been in the process of raising salaries, our campaigned engagement and shareholder resolution would have fast tracked the result. It has also made the company aware of how important this topic is to their investors.	(for Scopes 1 and 2 emissions), the setting of interim operational emissions reduction targets, improved disclosure of lobbying activities and more recently, the commitment made by the company to join the leading global partnership on methane, OGMP 2.0. However, there are still key areas where we require further improvements, including inclusion of Scope 3 emissions targets, further quantifiable disclosure of business resiliency and asset retirement obligations across relevant scenarios, capital allocation , and improving the level of ambition regarding interim targets. We are also seeking further transparency on their lobbying activities. The company remains on our divestment list (for relevant funds), but our engagement with them continues. In terms of our next steps, LGIM will continue their direct engagements with the company under their Climate Impact Pledge and separately, to better understand challenge Exxon on their

approach to the energy transition, where financial material issues such as disclosure the potential costs to retire their long-lived assets and decarbonisation levers being some of the key discussion points. LGIM will also be engaging with proxy advisors and fellow investors to better understand their voting rationale.

We were pleased to see progress from the company in terms of joining the Oil and Gas Methane Partnership ('OGMP') 2.0 – the flagship oil and gas reporting and mitigation programme on methane, of which many global oil and gas companies, including BP and Shell, are already members. We have been working closely and collaboratively with EDF to raise awareness of the issue (letters, meetings, public statements) and applying pressure on oil and gas companies to join the OGMP initiative since 2021 – Exxon being one of them, through our direct engagements with the company under our

Climate Impact Pledge. Exxon had demonstrated reluctance, previously, to sign up to the OGMP and LGIM voted in favour of a shareholder resolution tabled at its 2023 AGM, requesting that the company produce a report on methane emission disclosure reliability, which received 36.4% support from shareholders. Public and shareholder pressure, growing membership of the OGMP and Exxon’s recent acquisition of OGMP member Pioneer Natural Resources appear to have swayed the company towards greater transparency.

Greater transparency is crucial in terms of enabling markets and investors to accurately price climate-related risks and opportunities which, in turn, is an incentive for companies to make the changes we are seeking.

Janus Henderson	**Case Study 1**	**Case Study 2**	**Case Study 3**
Name of entity engaged with	Ashmore	Home Depot	Glencore
Topic	Climate Change	Deforestation	Sustainability goals
Rationale	JH have engaged with a range of holdings to gain a better understanding of progress on setting carbon emission targets and improving carbon reporting transparency. JH believe that companies should set science-based targets where appropriate to show that they are managing climate risks in alignment with the Paris Agreement. Furthermore, alignment with CDP can help companies identify climate risks and opportunities, track progress and improve transparency.	Last year JH engaged with Home Depot regarding a shareholder proposal on deforestation. JH encouraged Home Depot to disclose to CDP Forests, however this is seen as a good 'first step' and we encouraged further disclosure and transparency to shareholders specifically on the 'how' and operationalization of their no-deforestation and wood sourcing policy. Home Depot say they favour Forest Stewardship Council (FSC) certified wood products but do not require FSC certification. The company committed that regardless of whether the proposal passed they would subscribe to CDP forests and disclose the relevant data. JH encouraged the company to use this opportunity to be a leader, and work with shareholders to make	JH engaged with Glencore on a range of sustainability concerns particularly, 1) corporate culture and legacy bribery/corruption allegations, 2) environmental litigation risk particularly pertaining to methane pollution, 3) Energy transition commitments and timeframes. JH chose Glencore as a specific engagement target as the company has been flagged as a laggard regarding energy transition commitments.

		progress in this space. This proposal subsequently passed, with 65% of shareholders voting for Home Depot to produce a report disclosing the company's impact on primary forests. JH will have a follow up conversation with the company to understand what progress has been made.	
What the investment manager has done	JH had a call with Ashmore, a specialist emerging market asset manager in order to better understand how they are thinking about decarbonisation and associated risks in their portfolio. Ashmore reviews all reporting initiatives annually and currently uses the Net Zero Asset Owner Alliance (NZAOA) Target Setting Protocol to inform its target setting rather than the SBTi Finance Framework. Although it was encouraging to hear this, only 6% of Ashmore's AUM is currently aligned to net zero goals and demand for net zero	The objectives of the call were as follows: •Understand progress made since shareholder proposal passed last year. •Review progress on adopting no-deforestation policy, disclosure, and targets/action plans for improving sustainable sourcing •Ultimate objective is to mitigate associated ESG risk (reputational as well as potential regulatory risk). The team spent considerable time discussing this proposal, not only because it's complicated but also because JH feel deforestation could	Engagement call with Glencore's head of Sustainability. Regarding Glencore's climate transition strategy (allocating capex to transition metals and supporting depletion of upstream energy; reduce emissions from coal; not progressing in greenfield thermal coal projects and closing of 12 mines; invest in CCUS), JH wanted to understand if there were any targets or timeframes to help investors understand where the short term focus is to decarbonise vs longer term goals. Also, in light of Glencore's potential acquisition strategy whether this aligned with the

	funds from its client base remains muted. This led to a broader discussion about how ESG is integrated across Ashmore's portfolios and how portfolio managers carry out impactful engagements as part of their investment process. JH also covered the company's approach to corporate decarbonisation and how it seeks to offset its operational carbon footprint. Both IR and the Head of Responsible Investment were on the call and came across very well. Their answers were well articulated and provided insights beyond those given by the sustainability report. They were transparent about difficulties that they face, including being realistic about client demand for net zero funds and the leverage they can have with sovereigns in their engagements. Whilst being an emerging market manager invested predominately in debt has its own nuances, it was very interesting to have this discussion with another asset	present asymmetric risk to the company. As a highly visible purchaser of lumber, HD is susceptible to substantial PR risk if it comes to be viewed as negligent in its disclosure practices on this important global topic. This was a follow up engagement to understand what progress had been made since the shareholder vote. The company confirmed they had just completed a deep dive supplier survey and are in the process of finalising a full report which will be published later this year. HD have also disclosed to CDP Forests, however only reported on private label wood products, which are very small as a % of what HD sells. JH ended the call with a commitment to speak again when the full reporting is out later this year.	company climate strategy to reduce coal output. Also wanted to understand from a governance perspective, who on the board is providing the oversight/expertise regarding Glencore's transition. On the topic of methane, Glencore operate 13 open-cut coal mines and 4 underground mines across Australia. Glencore previously highlighted how unlike underground mines, "methane from 'gassy' open-cut coal mines cannot be captured" as no technologies are available. JH encouraged further management of methane emissions from coal mines especially in light of increased regulations in this space.

	manager who share similar challenges surrounding issues such as data.		
Outcomes and next steps	JH were pleased with the discussion and Ashmore's approach to integration. JH plan to continue to engage with Ashmore on disclosing to CDP and increasing the use of the NZAOA protocol.	JH encouraged HD to be on the front foot on improving traceability – potential to be part of collaborative coalition to work with suppliers to address these issues. As shareholders, JH appreciate the importance of the issue and a bit more of a risk factor if caught out on deforestation. Appreciate long-term balanced decisions on how to responsibly allocate capex to this issue. It is great to see improvement in disclosure, however, believe there is more HD can do. JH also flagged the emerging EU deforestation law and increased societal/regulatory focus on this topic alongside biodiversity. We encouraged expanding beyond FSC certifications, potentially leveraging geo-spatial/satellite data which is improving and seen as a more forward-	Off the back of this engagement a research note was circulated to all shareholders who hold the stock. One Fund manager decided to divest his shares from Glencore due to a range of sustainability concerns and lack of progress being made towards sustainability goals.

		thinking approach to manage the risk around traceability. JH will continue to engage once more information has been published later this year.	