

## Implementation Statement

# The Association of Chartered Certified Accountants Pension Scheme

### Purpose of this statement

This implementation statement has been produced by the Trustees of The Association of Chartered Certified Accountants Pension Scheme ("the Scheme") to set out the following information over the year to 31 December 2024:

- the voting activity undertaken by the Scheme's investment managers on behalf of the Trustees over the year, including information regarding the most significant votes; and
- how the Trustee's policies on exercising rights (including voting rights) and engagement activities have been followed over the year.

### Stewardship policy

The Trustee's Statement of Investment Principles (SIP) in force at 31 December 2024 describes the Trustee's stewardship policy on the exercise of rights (including voting rights) and engagement activities. It was last reviewed in June 2024 and has been made available online here:

[https://www.accaglobal.com/content/dam/ACCA\\_Global/about-us/ACCA-scheme-SIP.pdf](https://www.accaglobal.com/content/dam/ACCA_Global/about-us/ACCA-scheme-SIP.pdf).

The Trustees decided not to set stewardship priorities for the Scheme because the Scheme solely invests through pooled investment vehicles where the Scheme's assets only represent a small proportion of the capital invested in the funds. The Trustees understand that they are constrained by the policies of the managers. Additionally, only c.7% (£6.5m as at 31 December 2024) of the Scheme assets were invested in assets with voting rights attached.

However, the Trustees take the stewardship priorities, climate risk, and ESG factors into account at manager selection. The Trustees also review the stewardship and engagement activities of the investment managers annually.

### How voting and engagement/stewardship policies have been followed

Based on the information provided by the Scheme's investment managers, the Trustees believes that its policies on voting and engagement have been met in the following ways:

- The Scheme invests entirely in pooled funds, and as such delegates responsibility for carrying out voting and engagement activities to the Scheme's fund managers.
- Annually, the Trustees receive and review voting information and engagement policies from both the asset managers and our investment advisors, which we review to ensure alignment with our own policies. This exercise was undertaken both as part of the annual implementation statement and ESG monitoring report.

- As part of ongoing monitoring of the Scheme's investment managers, the Trustees use ESG rating information available within the pensions industry or provided by their investment consultant, to assess how the Scheme's investment managers take account of ESG issues.
- Having reviewed the above in accordance with their policies, the Trustees are comfortable the actions of the fund manager is in alignment with the Scheme's stewardship policies.

Additional information on the voting and engagement activities carried out for the Scheme's investments are provided on the following pages.

**Prepared by the Trustees of The Association of Chartered Certified Accountants Pension Scheme**

**April 2025**

## Voting Data

This section provides a summary of the voting activity undertaken by the investment managers within the Scheme's Growth Portfolio on behalf of the Trustees over the year to 31 December 2024. The holdings in the LDI portfolio (including cash holdings) and credit assets, with Legal & General (LGIM), CVC Capital Partners (CVC) and M&G Investments (M&G) have no voting rights and limited ability to engage with key stakeholders given the nature of the mandate.

CBRE (the investment manager for the property holdings) have not disclosed voting data and have noted in the past:

*"With regard to voting, CBRE Investment Management Indirect ("CBRE IM Indirect") manages indirect private real estate portfolios on behalf of separate accounts and pooled vehicles, such as Global Alpha, and will exercise voting on any relevant issues that may arise."*

*"The nature of the voting undertaken for the investments targeted differs from listed equities, being typically of an administrative nature or can relate to governance matters. As voting forms only a limited part of our overall engagement approach, which includes regular interaction with our operating partners and underlying fund managers through control rights or advisory board representation, alongside meetings with management, we therefore determine it more suitable to document our engagement efforts through the examples and responses provided in the engagement questionnaire and we also provide CBRE IM Indirect's engagement policy (attached), which sets out how stewardship is integrated within our investment process."*

Manager	LGIM
<b>Fund name</b>	Future World Global Equity Index Fund and Future World Global Equity Index GBP Hedged
<b>Structure</b>	Pooled
<b>Ability to influence voting behaviour of manager</b>	The pooled fund structure means that there is limited scope for the Trustees to influence the manager's voting behaviour.
<b>Number of company meetings the manager was eligible to vote at over the year</b>	5,516
<b>Number of resolutions the manager was eligible to vote on over the year</b>	55,469
<b>Percentage of resolutions the manager voted on</b>	99.8%
<b>Percentage of resolutions the manager abstained from</b>	0.9%
<b>Percentage of resolutions voted <i>with</i> management, as a percentage of the total number of resolutions voted on</b>	81.%
<b>Percentage of resolutions voted <i>against</i> management, as a percentage of the total number of resolutions voted on</b>	18.2%

Manager	LGIM
<b>Proxy voting advisor employed</b>	Institutional Shareholder Services (ISS)
<b>Percentage of resolutions voted contrary to the recommendation of the proxy advisor</b>	10.0%

*The proportion of resolutions that were voted on or abstained from may not sum to 100.0%. This can be due to how managers or local jurisdictions define abstentions or classify formal voting or abstentions as opposed to not returning a voting form or nominating a proxy.*

## Significant votes

The change in Investment and Disclosure Regulations that came into force from October 2020 requires information on significant votes carried out on behalf of the Trustees over the year to be set out. The guidance does not currently define what constitutes a “significant” vote. However, recent guidance states that a significant vote is likely to be one that is linked to one or more of a scheme’s stewardship priorities/themes. At this time, the Trustees have not set stewardship priorities/themes for the Scheme.

For this Implementation Statement, the Trustees have asked the investment managers to determine what they believe to be a “significant vote”. The Trustees have not communicated voting preferences to their investment managers over the period, as the Trustees are yet to develop a specific voting policy. In the future, the Trustees will consider the most significant votes in conjunction with any agreed stewardship priorities / themes.

LGIM have provided a selection of votes which they believe to be significant. The Trustees have selected three votes from the manager, these cover a range of themes to represent what it considers the most significant votes cast on behalf of the Scheme, which are shown in **Appendix 1**.

## Fund level engagement

The investment managers may engage with investee companies on behalf of the Trustees. The table below provides a summary of the engagement activities undertaken by each manager during the year for the relevant funds. Information relating to fund level engagement policies was requested from all fund managers.

LGIM and CBRE provided engagement data at firm level, rather than at fund level.

CVC are unable to provide this data for the Global Yield Fund. CVC informed the Trustees’ investment advisers that, as a credit strategy, engagement is not really something that they can actively influence or monitor. The composition of Global Yield is a pool of ‘large cap’ liquid loans and whilst CVC do engage in ESG screening for the investments they make, they have stated that they cannot engage or vote on the actions any of their investee companies choose to take. As such, CVC have not been included in the table below.

Engagement activities are limited for the Scheme’s LDI and cash funds due to the nature of the underlying holdings, so engagement information for these assets have not been shown.

Manager	LGIM	CBRE
<b>Fund name</b>	Future World Global Equity Index Fund and Future World Global Equity Index GBP Hedged	Global Alpha Fund
<b>Number of engagements undertaken on behalf of the holdings in this fund in the year</b>	2027	Data not provided
<b>Number of engagements undertaken at a firm level in the year</b>	4060	Data not provided
<b>Examples of engagements undertaken with holdings in the fund*</b>	<p><b>GREGs FOCUS: Anglo American:</b> LGIM first presented ideas around portfolio restructuring to Anglo American in April 2024. However, days later, and before the proposal could be circulated to the management team more broadly, BHP made an offer to buy Anglo American. LGIM determined that the offer did not constitute good value for money for shareholders and threatened to slow down the pace of copper growth globally. This view was communicated publicly through several newspaper articles, as well as by senior executives from BHP and Anglo American. LGIM was subsequently consulted by Anglo American on its defence strategy multiple times, with five meetings with senior management and board members during what is known as the "put up or shut up" period.</p> <p>On 14 May 2024, Anglo American announced its intention to significantly restructure its portfolio by exiting its platinum, diamond, metallurgical, coal and nickel businesses and pausing investment in its Woodsmith mine. Later that month, the board announced it had refused BHP's offer. The portfolio restructuring is expected to take between 18 and 24 months to complete.</p>	
	<p><b>Remedy US Medical Office Programmatic Venture:</b> CBRE engaged with the manager to review the portfolio's 2024 GRESB results and recommendations. CBRE and the manager discussed the drivers of the venture's 2024 GRESB results and identified improvement opportunities and potential next steps. These include an increase to building certifications and data coverage through further tenant engagement, utility tracking, and green lease language. The venture is progressing on its tenant engagement program and has received interest from tenants regarding EV charging.</p>	

Manager	M&G
<b>Fund name</b>	Total Return Credit Fund
<b>Number of engagements undertaken on behalf of the holdings in this fund in the year</b>	11
<b>Number of engagements undertaken at a firm level in the year</b>	406
<b>Examples of engagements undertaken with holdings in the fund*</b>	<p><b>Ørsted:</b> M&amp;G engaged Ørsted to ensure they were advancing their approach to biodiversity, given Ørsted's mature positive by 2030 target. M&amp;G met with the company's global sustainability team climate lead and global sustainability team biodiversity lead to run through the Nature Action 100 benchmark, which involves ambition, assessment, targets, implementation, governance and engagement to ascertain Ørsted's progress in each of these areas. Ørsted demonstrated to M&amp;G how they have worked on this issue for the past two and a half years. M&amp;G was very satisfied that Ørsted was taking biodiversity extremely seriously and plans to follow up after the initial framework and metrics have been published next year.</p>

Source: Fund managers

## Appendix 1 – Significant Votes

### LGIM Future World Global Equity Index Funds

	Vote 1	Vote 2	Vote 3
<b>Company name</b>	Microsoft Corporation	Apple Inc.	Alphabet Inc.
<b>Date of vote</b>	10/12/2024	28/02/2024	07/06/2024
<b>Summary of the resolution</b>	Report on AI Data Sourcing Accountability	Report on Risks of Omitting Viewpoint and Ideological Diversity from EEO Policy	Elect Director John L. Hennessy
<b>How the manager voted</b>	For	Against	Against
<b>If the vote was against management, did the manager communicate their intent to the company ahead of the vote?</b>	LGIM publicly communicates their voting instructions on their 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.		
<b>Rationale for the voting decision</b>	Governance: A vote for this resolution is applied as the company is facing increased legal and reputational risks related to copyright infringement associated with its data sourcing practices. While the company has strong disclosures on its approach to responsible AI and related risks, shareholders would benefit from greater attention to risks related to how the company uses third-party information to train its large language models.	Environmental and Social: A vote against this proposal is applied, as the company appears to be providing shareholders with insufficient disclosure around its diversity and inclusion efforts and non-discrimination policies. Including viewpoint and ideology in EEO policies does not appear to be a standard industry practice.	Diversity: A vote against is applied as LGIM expects a company to have at least one-third women on the board. Independence: A vote against is applied as LGIM expects the Chair of the Committee to have served on the board for no more than 15 years to maintain independence and a balance of relevant skills, experience, tenure, and background. Shareholder rights: A vote against is applied because LGIM supports the equitable structure of one-share-one-vote. LGIM expects companies to move to a one-share-one-vote structure or provide shareholders a regular vote on the continuation of an unequal capital structure.
<b>Outcome of the vote</b>	Fail	Fail	Pass
<b>Implications of the outcome</b>	LGIM will continue to engage with their investee companies, publicly advocate their position on this issue and monitor company and market-level progress.		
<b>Criteria on which the vote is considered “significant”</b>	High Profile meeting: This shareholder resolution is considered significant due to the relatively high level of support received.	Thematic - Diversity: LGIM views diversity as a financially material issue for their clients, with implications for the assets LGIM manage on their behalf.	Thematic - Diversity: LGIM views gender diversity as a financially material issue for their clients, with implications for the assets LGIM manages on their behalf. Thematic - One Share One Vote: LGIM considers

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**Vote 1****Vote 2****Vote 3**

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this vote to be significant as LGIM supports the principle of one share one vote.