

ACCOLADE WINES GROUP PENSION PLAN

IMPLEMENTATION STATEMENT

The Trustee of the Accolade Wines Group Pension Plan has prepared this implementation statement in compliance with the governance standards introduced under the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 (as amended). Its purpose is to demonstrate how, and the extent to which, the Plan's Statement of Investment Principles (SIP) dated 30 September 2019 has been followed, if there has been any review of the SIP and how the policies on voting, stewardship and engagement have been followed. This statement covers the period 31 December 2021 to 31 December 2022.

A. Voting and Engagement Policy

The policy as set out in the SIP in respect of voting, stewardship and engagement is in summary as follows:

- i. The Plan only invests via pooled investment funds, meaning that the Plan's investments pooled with those of other investors. It can be harder for those invested in pooled funds to exert their influence, given the other investors with a stake, but the Trustees still monitor and engage as much as possible.
- ii. Voting decisions on stocks are delegated to the investment manager of the pooled funds held by the Plan.
- iii. SEI, the Plan's Fiduciary Manager, or the investment manager of a third party pooled fund, has full discretion for undertaking engagement activities in respect of the investments.
- iv. Where the investment manager is SEI, they have pooled their holdings in their funds with other investors and employed a specialist ESG provider for voting and engagement services.
- v. SEI will report on voting and engagement activity to the Trustees on a periodic basis together with its adherence to the UK Stewardship Code. The Trustees will consider whether the approach taken was appropriate or whether an alternative approach is necessary. The Fiduciary Manager is a signatory to the UK Stewardship Code 2020.
- vi. Trustees will assess the Fiduciary Manager's performance against objectives annually including how well the Fiduciary Manager is aligned with the SIP in terms of ESG factors.

The Trustees are of the opinion that this policy has been followed during the year. In particular:

- The Trustees have received and reviewed quarterly reports from SEI that set out:
 - How SEI has voted on all the shares where SEI has voting rights including number of votes for, against and abstentions. For votes against, details of the issue to which the vote relate is provided.
- SEI's engagement priorities which for 2022 included priorities in each of the following categories:
 - Climate change
 - Sustainable Agriculture
 - Modern Slavery
 - Future of Work
 - Board Governance
- The number of companies engaged and the number of milestones achieved by engagement issue and a rating of its significance.
- The Trustees reviewed the above quarterly reports throughout the Plan year and monitored performance. The Trustees were satisfied with the content of the report and that SEI's performance was in line with the SIP and the Trustees' expectations.
- The Trustees have considered SEI's voting practices and stewardship policies noting that they are a signatory to the UN Principles for Responsible Investment.
- The Trustees have a process in place to review SEI's performance against objectives, including ESG factors.

ACCOLADE WINES GROUP PENSION PLAN

- SEI's engagement efforts are primarily focused on public equities; however, many companies represented in our engagement efforts are also held in fixed income strategies. SEI believes that these fixed income funds also benefit from the positive progress that results from productive shareholder engagement. The engagement on climate change through SEI's collaboration with their engagement partner spans both equity and fixed income.

In light of the above and otherwise, the Trustees have considered their policy in regard to voting and stewardship and concluded that:

- SEI's voting and stewardship policies and implementation on behalf of the Trustees remain aligned with the Trustees' views on these matters.
- The current policy is appropriate and no further action is required at this stage, albeit the Trustees will continue to monitor the performance of this policy and SEI's performance in the future.

B. Voting Record

All underlying securities in pooled funds that have voting rights are managed by SEI with SEI having the legal right to the underlying votes. SEI in turn use a Specialist ESG Provider, namely Glass Lewis as a proxy for all voting. SEI provide the Specialist provider with the holdings across all SEI's pooled funds and the proxy votes are cast according to a policy set out by SEI. During the period from 31 December 2021 to 31 December 2022, across the Plan's holdings¹ SEI voted as follows, including the percentage of overall votable items voted on:

Fund Name	Factor Allocation Global Equity	Dynamic Asset Allocation	UK Fundamental Equity
ISIN	IE00BDD7WJ18	IE00B5NNKL10	IE00B3KF4Q98
Number of Votable Meetings	748	745	51
Number of Votable Items	12518	14797	931
% of Items Voted	97%	94%	97%
For	89%	93%	98%
Against	9%	6%	2%
Abstain/ Withheld/ Other	2%	1%	0%
% of votes with management	89%	94%	98%
% of votes against management	9%	6%	2%
% of votes other	2%	0%	0%
Voting Against/Abstain by Category			
Capital Related	14%	3%	0%
Board/Directors/Governance	47%	37%	35%
Remuneration Related	14%	21%	29%
Shareholder Proposals	17%	26%	24%
Other	8%	13%	12%

¹ SEI has shown voting data for the relevant quarters the fund was invested in.

ACCOLADE WINES GROUP PENSION PLAN

Fund Name	Emerging Markets Equity	UK Quantitative Equity
ISIN	IE0000629257	IE00B3KF5229
Number of Votable Meetings	754	212
Number of Votable Items	6962	3617
% of Items Voted	99%	99%
For	83%	98%
Against	13%	2%
Abstain/ Withheld/ Other	4%	0%
% of votes with management	82%	98%
% of votes against management	14%	2%
% of votes other	5%	0%
Voting Against/Abstain by Category		
Capital Related	17%	1%
Board/Directors/Governance	52%	27%
Remuneration Related	11%	43%
Shareholder Proposals	1%	7%
Other	19%	21%

C. Significant Votes

A highlight of some of the significant votes during the period are shown in the table below. These votes are considered to be significant as they have a material impact on the company or the wider community. SEI's selects votes based on one or more of the following criteria's:

- Votes SEI consider to be high profile which have such a degree of controversy that there is high client and/ or public scrutiny.
- Votes relating to companies with a high or severe ESG risk rating.
- Votes relating to companies on one of SEI's watch lists. Watch lists cover ESG topics such as climate and diversity as well as initiatives including Climate Action 100 + and the United Nations Global Compact.
- Votes relating to our 2022 thematic priorities as described in Section D.

To date the Trustees have accepted SEI's position on what constitutes a significant vote but this will be kept under consideration.

ACCOLADE WINES GROUP PENSION PLAN

Company Name	Held in Fund(s) (% size of holding) ²	Theme	Date of Vote and Outcome	Vote Decision and Significance of vote
Amazon	Dynamic Allocation Fund (0.08%)	Corporate Governance	Date: 25/5/2022 Outcome: Against	Voted Against the proposal 'advisory vote on executive compensation'. In association with the new CEO transition, Mr Jassy is set to receive \$212 million as a time based promotion award, which will become fully vested in ten years. Large awards like this can undermine the integrity of a company's regular incentive plans and the link between pay and performance. Although the long vesting period may help lessen concerns around the lack of performance based conditions, an award of this size without performance – based vesting conditions is concerning. This vote is deemed significant because the lack of clarity of future grants to Mr Jassy and lack of transparency to the shareholders through performance-based conditions for a grant this size warrant shareholder opposition. In addition, Amazon has a high ESG risk rating.
Bezeq	Factor Allocation Global Equity (0.1%)	Corporate Governance	Date: 28/4/2022	Voted Against the proposal 'amend employment terms of executive chair'. SEI believes that the shareholders should be concerned that management would keep the right to grant an annual bonus to the chair on a discretionary basis, without the need of any quantitative measure of performance. SEI believes this is not in the shareholders' best interests and the company has also failed to disclose a clear description of their performance hurdles. This vote is deemed significant because without this disclosure it makes it hard to evaluate the extent to which the company aligns annual executive compensation with short-term performance and Bezeq has a high ESG risk rating.
Rami Levi Chain Stores Hashikma Marketing Ltd	Factor Allocation Global Equity (<0.01%)	Corporate Governance	Date: 29/6/2022 Outcome: For	Voted Against the proposal 'elect Mordechai Berkovitch'. In 2021 Rami Levi acknowledged that their long-serving board chair Mordechai Berkovitch had criminal charges brought to him by the Jerusalem District Attorney's Office. There has been a very slow response from the company in making the shareholders aware of the allegations and

² % holding as at last day of the quarter in which vote occurred.

ACCOLADE WINES GROUP PENSION PLAN

				these charges were in connection to activities that allegedly occurred during his time as an external legal consultant of Beit Shemesh municipality. This vote is deemed significant because Mordechai Berkovitch is a long-standing board member and SEI believes that Rami Levi's shareholders should be concerned with the criminal investigations he is involved in as matters may worsen and it may dampen shareholder value. Rami Levi has a high ESG risk rating.
Sime Darby Plantation Berhad	Emerging Markets (0.04%)	Corporate Governance Employee Health & Safety	Date: 16/6/2022 Outcome: For	Voted Against the proposal 'elect Tan Ting Min' to the board. Sime Darby Plantation has been involved in allegations of forced labour and child labour on plantations and estates which they own and run. In January 2022 CBP issued a finding stating that there was enough information to indicate the existence of forced or indentured labour. This vote is deemed significant because SEI believe the risk committee should have oversight of the company's main functions and it is their responsibility of ensuring adequate risk management mechanisms are in place. Since the risk committee did not adequately address the company's labour practices no past and present member of the risk committee should be up for re-election like Tan Ting Min. Sime Darby Plantation Berhad has a high ESG risk rating.
Tesla Inc.	Dynamic Asset Allocation (0.26%) Factor Allocation Global Equity (<0.01%)	Corporate Governance Social	Date: 08/04/2022 Outcome: Against	Voted For the 'Shareholder Proposal Regarding Report on Effectiveness of Workplace Sexual Harassment and Discrimination Policies'. In the last five years, Tesla has faced more than 40 lawsuits from former and current employees alleging that it fosters a sexist and racist work culture. In the lawsuits, Tesla is depicted as having a workplace where slurs, groping, and threats are commonplace, and where the human resources function has repeatedly failed to address workers' concerns. These allegations made by employees are mainly claims of harassment, discrimination and poor working conditions. This vote is considered significant because a failure to adequately address matters related to sexual harassment and discrimination could result in significant difficulties attracting and retaining employees, fines or additional lawsuits, and, ultimately, the erosion of shareholder value. By reporting on the effectiveness and outcomes of its efforts to

ACCOLADE WINES GROUP PENSION PLAN

				prevent harassment and discrimination, it will allow shareholders to better understand the efficacy of the Company's policies and initiatives. The report will also help to identify Tesla's progress on relevant metrics and targets and mitigate potential risks.
Eutelsat Communications	Factor Allocation Global Equity (0.06%)	Corporate Governance Social	Date: 10/11/2022 Outcome: Against	Voted Against the 'Ratification of the Co-Option of Eva Merete Søfelde Berneke'. Eutelsat Communications provides satellite TV services to Russia, among which Tri kolor and NTV, which are considered to be the spearheads of Russian war propaganda and a major source of news and information for 25% to 30% of the Russian population. Since the Russian invasion of Ukraine, Eutelsat has received public opposition for deciding to maintain its operations in Russia, which represented 6.7% of its revenue in the past fiscal year. This vote is deemed significant because the level of disclosure provided by the Company on its decision to maintain operations in Russia constitutes a substantial failure to properly inform shareholders on material risks. As CEO of the Company, shareholders could reasonably hold Eva Merete Søfelde Berneke accountable for this issue.
REA Group Limited	Dynamic Asset Allocation (<0.01%)	Corporate Governance Social	Date: 10/11/2022 Outcome: For	Voted Against the proposal to 'Elect Kelly Bayer Rosmarin'. Ms Bayer Rosmarin is also the CEO of Optus and Consumer Australia, a wholly-owned subsidiary of Singaporean telecommunications company Singtel. On September 22, 2022, Optus notified the public about a significant cyberattack that resulted in a major data breach of both current and former customers' personal information. Up to 9.8 million customer records were leaked, which included customers' names, dates of birth, phone numbers, and email addresses, as well as, in some cases, street addresses, driving licence details and passport numbers. On October 11, 2022, the Office of the Australian Information Commissioner launched an investigation into whether Optus took reasonable steps to protect the personal data of its customers. This vote is deemed significant as the gravity of the matter and the significant reputational damage Optus has experienced under Ms Bayer Rosmarin's watch is questionable. In addition the demands of her CEO position at Optus will significantly increase for the foreseeable

ACCOLADE WINES GROUP PENSION PLAN

				future when the company deals with the backlash from this crisis. This will likely preclude Ms Bayer Rosmarin from devoting the required attention, priority and time to REA's needs.
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D. Engagement Activity

A highlight of some of the engagements during the period are shown in the table below. SEI conducts shareholder engagement collaboratively through third party specialists Sustainalytics and Columbia Threadneedle Investment reo. Each case study describes a milestone achieved relating to our engagement priorities as described in Section D.

Company Name	Held in Fund(s)	Theme	Objective	Description
Archer-Daniels-Midland (ADM)	Dynamic Asset Allocation	Sustainable Agriculture	Progress on ESG governance, land use, biodiversity and carbon management activities	<p>Through our collaborative engagement with Sustainalytics, we have engaged with ADM to encourage a transition to more sustainable agricultural practices, a holistic response to environmental challenges, and to contribute to a more sustainable food system.</p> <p>During a call in May 2022, ADM discussed its approach to carbon and land management risks. The company explained recent updates to their executive share plan, outlining the integration of ESG metrics (carbon emissions and employee diversity criteria) to replace total shareholder return, which are more reflective of stakeholder materiality and desired behaviour change.</p> <p>Archer-Daniels-Midland also mentioned their attention to deforestation and carbon sequestration exposures, and has put a stakeholder materiality assessment in place to monitor these exposures and impacts. This includes a goal to mitigate deforestation in all supply chains by 2030, which is already in progress.</p> <p>ADM has set a robust target to reduce 25% of its scope 3 greenhouse gas emissions by 2035 from a 2019 baseline, outlined by a clear strategy focused on the company's supply chain activities. Through various approaches to supply chain management, ADM is taking steps to reduce its ecological impacts and risks.</p>
Siemens AG	Dynamic Asset Allocation	Future of Work	Develop a proactive human capital management approach in hiring, developing	<p>Through our collaborative engagement with Sustainalytics, we have engaged with Siemens to encourage continued development of human capital management approaches that address workplace transformations such as technology and remote work and enhanced focus on diversity,</p>

ACCOLADE WINES GROUP PENSION PLAN

			<p>and retaining talent to address the transformation caused by emerging trends.</p>	<p>equity and inclusion. Siemens is a global technology firm with 380,000 employees.</p> <p>Siemens has set a goal to achieve 30% female representation in top management by 2025. It has acknowledged challenges collecting diversity data beyond gender given the company's global footprint, differences in local diversity expectations, and the need to maintain employee privacy.</p> <p>In March 2022, Siemens invited Sustainalytics to participate in an internal event focused on the future of work, with a focus on measuring the effectiveness of upskilling and reskilling programs as part of a company initiative to help employees build their skills to stay ahead in a changing workplace.</p> <p>Ongoing dialogue with Siemens is focused on diversity in leadership, pay equity, and efforts to make the company more inclusive.</p>
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