

Engagement Policy Implementation Statement (“EPIS”)

Pitney Bowes Pension Fund (the “Fund”)

Fund Year End – 31 March 2025

The purpose of the EPIS is for us, the Trustee of the Pitney Bowes Pension Fund, to explain what we have done during the year ending 31 March 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 engagement activity, and the activities completed by our managers align with our stewardship expectations.

Over the year, we delegated the management of most of the Fund’s assets to Aon Investments Limited (“AIL”). We believe the activities completed by AIL to review the underlying managers’ voting and engagement policies, and activities align with our stewardship expectations. We believe our voting rights have been implemented effectively on our behalf.

How voting and engagement policies have been followed

The Fund is invested entirely in 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. In particular, we received quarterly ESG ratings from Aon for the funds the Fund is invested in where available.

The Fund's stewardship policy can be found in the SIP:

https://pensioninformation.aon.com/pitneybowespensionfund/fileviewer.aspx?FileID=14266&FileName=PB%20SIP_June%202024%20v3%20-%20clean.pdf

Our Engagement Action Plan

Based on the work we have done for the EPIS, we have decided to take the following steps:

1. Arrowstreet, Man Group, Threadneedle Asset Management ("Threadneedle AM"), Schroders and Marshall Wace did not provide fund level engagement information. AIL will continue to engage with these managers on our behalf.
2. We will continue to monitor the environmental, social and governance ("ESG") practices of our investment managers and AIL, as our delegated portfolio manager. We will also make changes where necessary following consultation from our investment adviser, Aon.

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 delegated manager's engagement activity

Over the year, we delegated the management of most of the Fund's assets to AIL. AIL manages the Fund's assets in a range of funds which can include multi-asset, multi-manager and liability matching funds. AIL selects the underlying investment managers on our behalf.

For this portion of the Fund's portfolio, we delegated monitoring of ESG integration and stewardship of the underlying managers to AIL. We have reviewed AIL's latest annual Stewardship Report and we believe it shows that AIL is using its resources to effectively influence positive outcomes in the funds in which it invests.

Over the year, AIL held several engagement meetings with many of the underlying managers in its strategies. AIL discussed ESG integration, stewardship, climate, biodiversity and modern slavery with the investment managers. AIL provided feedback to the managers after these meetings with the aim of improving the standard of ESG integration across its portfolios.

Over the year, AIL engaged with the industry through white papers, working groups, webinars and network events, as well as responding to multiple consultations.

AIL has a net zero commitment to deliver UK delegated investment portfolios and default strategies which have a net zero carbon emissions profile by 2050.

AIL also successfully renewed its signatory status to the 2020 UK Stewardship Code, which is a voluntary code established by the Financial Reporting Council that sets high standards on stewardship for asset owners, investment managers and service providers.

What is delegated management?

Delegated management is the delegation of some, or all, of the day-to-day investment decisions and implementation to a fiduciary manager. But the trustees still retain responsibility for setting the high-level investment strategy.

In fiduciary management arrangements, the trustees will often delegate monitoring ESG integration and asset stewardship to its fiduciary manager.

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.

Voting statistics

The table below shows the voting statistics for each of the Fund's material funds with voting rights for the year to 31 March 2025.

Funds	Number of resolutions eligible to vote on	% of resolutions voted	% of votes against management	% of votes abstained from
Legal & General Asset Management ("L&G") - Multi-Factor Equity Fund (Hedged)	11,446	99.8%	20.8%	0.4%
UBS Global Asset Management ("UBS") - Global Equity Climate Transition Fund	12,234	93.0%	8.1%	0.1%

Source: Managers. 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 managers use proxy voting advisers.

Managers	Description of use of proxy voting advisers (in the managers' own words)
L&G	L&G's Investment Stewardship team uses Institutional Shareholder Services' ("ISS") 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by L&G and we do not outsource any part of the strategic decisions. To ensure our proxy provider votes in accordance with our position on ESG, we have put in place a custom voting policy with specific voting instructions.
UBS	UBS AM retains the services of Institutional Shareholder Services (ISS) for the physical exercise of voting rights and for supporting voting research. UBS retains full discretion when determining how to vote at shareholder meetings.

Source: Managers

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

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.

Significant voting examples

To illustrate the voting activity being carried out on our behalf, we asked the Fund's investment managers to provide a selection of what they consider to be the most 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 (this includes investment managers appointed by AIL as part of their delegated responsibilities). 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	
Aberdeen – Climate Transition Bond Fund	104	1,868	Environment - Climate; Other Environment Related Social - Human Rights & Stakeholders; Labour Management Governance - Corporate Governance; Corporate Behaviour
L&G - Diversified Credit Fund	326	4,399	Environment - Climate Change; Antimicrobial Resistance; Natural Resource Use/Impact Social - Human and Labour Rights; Human Capital Management; Inequality Governance – Remuneration; Board Effectiveness – Diversity; Board Effectiveness – Independence/Oversight Strategy, Financial & Reporting – Strategy/Purpose; Financial Performance; Reporting
Aegon Asset Management (“Aegon”) - European Asset Backed Securities (“ABS”) Fund	115	422	Environment - Climate Change Social - Human and Labour Rights; Public Health Governance - Financial and Reporting - Reporting (e.g. audit, accounting, sustainability reporting) Other - General Disclosure
M&G - Sustainable Total Return Credit Investment Fund	12	406	Environment - Net Zero/Decarbonisation; Climate Action 100+ Engagements; Climate Change; Nature & Biodiversity Social - Diversity & Inclusion
Ardea - Global Alpha Fund**	40	40	Environment - Climate Change Other - Market Development of Green Government Bonds
Arrowstreet - ESG Global Equity Long/Short Fund	<i>Not provided</i>	159	Environment* - Water Quality; Water Security Social* - Human and Labour Rights; Community Relations Governance* - Business Ethics; Accounting and Taxation
Caius Capital - International Fund	>30	>30	Governance - Board Effectiveness - Other; Leadership - Chair/CEO Strategy, Financial & Reporting - Strategy/Purpose; Financial Performance
Man Group - Alternative Risk Premia Fund	<i>Not provided</i>	66	Environment* - Climate Change; Natural Resource Use/Impact Social* - Human and Labour Rights; Human Capital Management Governance* - Remuneration
Marshall Wace - Market Neutral ESG TOPS Fund	<i>Not provided</i>	<i>Not provided</i>	Environment* - Climate Change; Natural Resource Use/Impact

L&G - Multi-Factor Equity Fund (Hedged)	682	4,399	Environment - Climate Change; Natural Resource Use/Impact; Pollution, Waste Social - Human and Labour Rights; Human Capital Management; Inequality Governance – Remuneration; Board Effectiveness – Diversity; Board Effectiveness – Independence/Oversight Strategy, Financial & Reporting – Strategy/Purpose; Financial Performance; Risk Management
Threadneedle Asset Management – Property Unit Trust	<i>Not provided</i>	942	Environment* - Climate Change; Natural Resource Use/Impact; Pollution, Waste Social* - Human Capital Management; Human and Labour Rights; Inequality Governance* - Leadership - Chair/CEO; Board Effectiveness - Other; Remuneration Strategy, Financial & Reporting - Capital Allocation; Financial Performance; Strategy/Purpose
UBS - Global Equity Climate Transition Fund	174	425	Environment - Climate Change; Natural Resource Use/Impact Social - Human and Labour Rights Governance - Remuneration; Board Effectiveness - Other; Leadership - Chair/CEO Strategy, Financial & Reporting - Capital Allocation
Schroders - UK Property Fund	<i>Not provided</i>	4,713	Environment* - Climate Alignment - Decarbonising and Minimising Emissions; Climate Risk and Oversight; Nature-Related Risk and Management Social* - Customers and Consumers; Workers; Overarching Approach to Human rights Governance* - Boards and Management; Executive Remuneration; Board Diversity and Inclusion

Source: Managers.

*Arrowstreet, Man Group, Marshall Wace and Threadneedle and Schroders did not provide fund level themes; themes provided are at a firm-level.

**Ardea engagement activities are conducted centrally, and no additional strategy-specific engagements occurred during the reporting period, thus responses at both the firm and strategy level reflect the same data.

Data limitations

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

- L&G has provided complete engagement information. We note that the total number of engagements above refers specifically to the total number of interactions L&G held with individual companies as opposed to the number of engagements on specific engagement themes. Each interaction may cover multiple themes.
- Threadneedle did not provide fund level engagement data as engagement is conducted at the firm level.
- Schroders did not provide fund level engagement data stating that property managers are responsible for the day-to-day relationship with tenants. It is therefore difficult for them to quantify the level of engagement.
- Marshall Wace, Arrowstreet and Man Group did not provide all of the engagement information requested. This is because the assets managed by these managers are held tactically over a short period of time and/or indirectly through derivative exposures, meaning that engagement is less applicable to these assets given the long-term nature of engagements.
 - Marshall Wace provided limited engagement information but did provide detailed illustrative examples of its engagement activity at a firm level and stated that the manager undertakes

- engagement initiatives at the firm level rather than strategy level.
- Arrowstreet and Man Group provided detailed engagement information at a firm level only.

This report does not include commentary on certain asset classes such as liability driven investments, gilts or cash because of the limited materiality of stewardship to these asset classes. Further, this report does not include the additional voluntary contributions (“AVCs”) due to the relatively small proportion of the Fund’s assets that are held as AVCs.

Appendix – Significant Voting Examples

In the table below are some significant vote examples provided by the Fund’s managers. 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:

L&G - Multi-Factor Equity Fund (Hedged)	Company name	Wells Fargo & Company
	Date of vote	30 April 2024
	Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	0.5
	Summary of the resolution	Resolution 7: Commission Third Party Assessment on Company's Commitment to Freedom of Association and Collective Bargaining Rights
	How you voted?	Voted supporting resolution
	Where you voted against management, did you communicate your intent to the company ahead of the vote?	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.
	Rationale for the voting decision	Shareholder Resolution - Labour rights: A vote in favour is applied as L&G supports proposals that are set to improve human rights standards and employee policies because we consider this issue to be a material risk to companies.
	Outcome of the vote	Fail
	Implications of the outcome eg were there any lessons learned and what likely future steps will you take in response to the outcome?	L&G will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.
	On which criteria have you assessed this vote to be most significant?	High Profile meeting: This shareholder resolution is considered significant due to the relatively high level of support received.
UBS - Global Equity Climate Transition Fund	Company name	TotalEnergies SE
	Date of vote	24 May 2024
	Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	<i>Not provided</i>
	Summary of the resolution	Approve Report on Progress of Company's Sustainability and Climate Transition Plan (Advisory)
	How you voted?	Voted supporting resolution
	Where you voted against management, did you communicate your intent to the company ahead of the vote?	No
	Rationale for the voting decision	We have concerns around the growth plans for the LNG business.
	Outcome of the vote	Pass
	Implications of the outcome eg were there any lessons learned and what likely future steps will you take in response to the outcome?	The proposal was passed. We will continue to monitor ahead of the next AGM.
	On which criteria have you assessed this vote to be most significant?	Over 79% of shareholders voted for the proposal.

Source: Managers