

PENSIONS COMMITTEE

23 MARCH 2022

UK STEWARDSHIP CODE UPDATED 2021 DRAFT SUBMISSION

Recommendation

1. The Chief Financial Officer recommends that:

- a) The draft Stewardship Code for the Fund be noted;**
- b) He be granted delegated authority in consultation with the Chairman and Vice Chairman of the Pensions Committee to approve the final version of the Code for submission to the Financial Reporting Council (FRC) by the closing date on the 30 April 2022; and**
- c) An update report be presented to the meeting of the Pensions Committee on 28 June 2022.**

Background and update

2. The introduction of the Stewardship Code in July 2010 by the FRC strongly encouraged best practice in respect of investor engagement. The expectation was that institutional investors should publish a statement in respect of their adherence to the code. Compliance with the Code was on a voluntary basis.

3. The Fund previously agreed its Stewardship Compliance Statement at the Committee meeting on the 28 November 2018 and became a signatory to the Code. The Committee were informed at its March 2021 meeting that the UK Stewardship Code 2020 had been revised and had twelve principles.

4. The Fund submitted its application which was presented to the June 2021 Committee and received notification from the FRC (reported to the October 2021 Committee) that we (along with several LGPS funds) had been successful in becoming a signatory to the 2020 Stewardship Code, something which 64 organisations out of 189 organisations (including 147 asset managers, 28 asset owners including pension funds and insurers, and 14 service providers including data and information providers and investment consultants) applying to the FRC did not achieve. LGPS Central and West Midlands Pension Fund were also successful code signatories from the Pool.

5. FRC provided feedback on our submission on a number of areas under each of the 12 principles where the FRC require improvement for future submissions to remain a code signatory and the next submission is due on the 30 April 2022.

Purpose and Principles of the Code

6. The UK Stewardship Code 2020 ('the Code') sets high expectations for how investors, and those that support them, invest, and manage money on behalf of UK savers and pensioners, and how this leads to sustainable benefits for the economy, the environment and society. It is a set of 12 Principles for asset owners and asset managers, and a separate set of six Principles for service providers – investment consultants, proxy advisors, data providers and others.

7. The Fund's draft submission for Stewardship Code for the period 1 January – 31 December 2021 is attached as Appendix 1 which looks to take on board the improvement areas identified by the FRC in our last submission. Applicants that effectively evidence how they apply the Principles and meet the reporting expectations will be listed as signatories to the Code in the Summer 2022.

8. LGPS Central have offered support again to all partner funds in the submission particularly in providing evidence of engagement.

9. This report is seeking the Committee to note the draft application and grant delegated authority to Fund officers in consultation with the Chairman and Vice Chairman of the Pensions Committee to approve the final application and that an update is provided to the June 2022 Pension Committee.

Supporting information

- Appendix 1 – Draft Stewardship Code submission relating to period 2021

Contact Points

Specific Contact Points for this report

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Background Papers

In the opinion of the proper officer (in this case the Chief Financial Officer), there are no background papers relating to the subject matter of this report.