



The information in this letter is only for the person or entity to which it is addressed.
The contents may not be made public by the recipient before the FRC publishes the
UK Stewardship Code signatory list on Wednesday, 7 September 2022.

Mr Robert Wilson
Worcestershire County Council Pension Fund
Worcestershire County Council, Council Offices
Spetchley Road
Worcester
WR5 2NP

Friday, 2 September 2022

Application Outcome: Renewal Successful

Dear Mr Wilson

Thank you for submitting your Stewardship Code application.

We are pleased that Worcestershire County Council Pension Fund continues to meet the expected standard of reporting and will remain a signatory to the UK Stewardship Code ('the Code').

We will update the list of signatories and reports on our website on **7 September 2022**. We have updated the UK Stewardship Code logo and it is included in the folder with this letter. Please note that your use of the logo is subject to the terms and conditions and the *UK Stewardship Code logo user guide*. Please use the new version in any materials you create after this date.

Please treat this letter as confidential until the FRC has updated the list. Once the FRC has updated the list of signatories, please publish your report on your website.

We reviewed your report and assessed it against the Code in a way that is proportionate to your organisation's size and type. This assessment was then reviewed to ensure it was fair and appropriate. A sample of reports reflecting a range of applicants was also reviewed by our panel of independent advisors to ensure consistency. From 2023, our assessment will place greater emphasis on reporting the activities and outcomes of stewardship undertaken directly or by others on your behalf, during the reporting period.

Below is a summary of some areas we identified where improvement is needed when you submit your next report.

Your report

We have reviewed your new Stewardship Report and are pleased to see improvements in your reporting that addressed our feedback. Please address the areas identified below to remain a signatory in future.

For Principle 5, your report should explain why your approach to review and assurance is appropriate. For example, your report explains the use of an ESG Audit, however, better reporting would articulate why you have chosen this method of assurance. Your report should also explain how you have ensured your reporting is fair, balanced and understandable. For instance, your report could provide details about which individuals, teams or groups are responsible for ensuring your stewardship reporting is fair, balanced and understandable, and how this is considered.

For Principle 12, your report explains the expectations you have set your asset managers when exercising rights and responsibilities in listed equity and fixed income. However, your reporting could be improved by explaining the expectations you have set your asset managers to exercising rights and responsibilities in asset classes such as property and infrastructure.

Next steps

In November, the FRC will publish its *Effective Stewardship Review* of reports submitted in Spring 2022. This will give more detail about our expectations, include examples of effective reporting, and identify where we will expect reporting to improve in 2023. We will email you when this is published.

This letter sets out our final decision for this assessment period and we do not discuss individual assessments. To remain a signatory, you will need to submit a report by **30 April 2023**. Details about reporting periods and application deadlines are on the FRC's website.

Yours sincerely



David Styles
Director, Corporate Governance and Stewardship