Sleepeezee Retirement Benefits Plan 1975

Implementation Statement

This Implementation Statement has been prepared by Sleepeezee Pension Trustee Limited as the Trustee of the Sleepeezee Retirement Benefits Plan 1975 ("the Plan") and sets out:

- How the Trustee's policies on exercising rights (including voting rights) and engagement have been followed over the year to 31 March 2024; and,
- The voting behaviour of the Trustee, or that undertaken on its behalf, over the year.

Stewardship policy

On 11 February 2023 the Plan entered into a buy-in policy with Legal and General Assurance Society (LGAS). As such, the vast majority of the Plan's assets are now invested in the buy-in policy with LGAS, with a small residual allocation to gilts remaining. Therefore, the Trustees have decided not to set stewardship priorities for the Plan as, unless there is a significant change to the Plan's investment strategy in the future, there will be limited scope for stewardship on the Plan's investments. This also means that the Trustee has not submitted any expression of wishes to its fund managers in relation to their stewardship activities.

The Trustee's Statement of Investment Principles ("SIP") in force at 31 March 2024 describes the Trustee's stewardship policy on the exercise of rights (including voting rights) and engagement activities. It was last reviewed in March 2023 and has been made available online here:

sleepeezee.com/wp-content/uploads/2023/02/DOC160223-16022023180033.pdf

How voting and engagement policies have been followed

The Trustee delegates responsibility for carrying out voting and engagement activities to the Plan's investment managers. As at the period end, The Plan holds small investments in pooled gilt funds with Legal and General Investment Management (LGIM), outside of the bulk-annuity purchase.

Rights (including voting rights) have been exercised by the investment managers in line with the investment managers' general policies on corporate governance, which reflect the recommendations of the UK Stewardship Code, and which are provided to the Trustee from time to time. The Trustee expects the investment managers to engage with companies in relation inter alia to ESG matters and to take these into account in the selection, retention, and realisation of investments where appropriate.

The Trustee is comfortable with the investment managers' strategies and processes for exercising rights and conducting engagement activities, and specifically that they attempt to maximise shareholder value as a long-term investor.

Annually the Trustee receives and reviews voting information and engagement policies from the asset managers. The managers' prevailing documentation has been reviewed alongside the preparation of this statement.

Having reviewed the above in accordance with their policies, the Trustee is comfortable that the actions of the investment managers are in alignment with the Plan's stewardship policies.

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

The Trustee of the Sleepeezee Retirement Benefits Plan 1975
June 2024

Voting Data

Voting only applies to equities held by the Plan. As the Plan was only invested in pooled gilt funds over the reporting period, voting data is not applicable here.

Firm level engagement

Direct engagement is not undertaken for the holdings in the pooled gilt funds that were held by the Plan over the course of the year due to the nature of the assets. Therefore, engagement summary data is shown at a firm-level instead:

Manager	LGIM
Does the manager perform engagement activities?	Yes
Has the manager engaged with companies to influence them in relation to ESG factors in the year?	Yes
Number of engagements undertaken on behalf of the holdings in the Plan's funds in the year	n/a
Number of engagements undertaken at a firm level in the year	2,144
Examples of engagements undertaken by LGIM at a firm level	**Volkswagen** LGIM engaged with Volkswagen following MSCI assigning a red controversy flag to the firm due to allegations of forced labour in their plant in Xinjiang, China. As a consequence, LGIM increased their dialogue with the company and have engaged on human rights with the company's senior management including investor relations, the CFO, and the head of treasury. The engagement with Volkswagen has been well-received and Volkswagen obtained an independent audit of the Xingjiang plant in December 2023. The completion of the audit resulted in the removal of MSCI's red controversy flag. LGIM will continue to engage with Volkswagen on the subject of human rights and other governance topics, including the long-term future of the plant in Xinjiang and retain an open dialogue with the company and its management.