

CARL ZEISS LIMITED PENSION & ASSURANCE SCHEME FINANCIAL STATEMENTS

Year ended 30 September 2020

ENGAGEMENT POLICY IMPLEMENTATION STATEMENT FOR THE YEAR ENDING 30 SEPTEMBER 2020

Introduction

The Trustee of the Carl Zeiss Limited Pension & Assurance Scheme (the 'Scheme') has a fiduciary duty to consider their approach to the stewardship of the investments, to maximise financial returns for the benefit of members and beneficiaries over the long term. The Trustee can promote an investment's long-term success through monitoring, engagement and/or voting, either directly or through their investment managers.

This statement sets out how, and the extent to which, in the opinion of the Trustee, the policies (set out in the Statement of Investment Principles) on the exercise of rights (including voting rights) attaching to the investments, and engagement activities have been followed during the year ending 30 September 2020. This statement also describes the voting behaviour by, or on behalf of, the Trustee.

The Trustee, in conjunction with the investment consultant, appoints the investment managers and chooses the specific pooled funds to use in order to meet specific Scheme policies. The Trustee expects that the investment managers make decisions based on assessments about the financial and non-financial performance of underlying investments including environmental, social and governance (ESG) factors, and that they engage with issuers of debt or equity to improve their performance (and thereby the Scheme's performance) over an appropriate time horizon.

The Trustee also expects its investment managers to take non-financial matters into account as long as the decision does not involve a risk of significant detriment to members' financial interests.

During the year, the Trustee received training from its investment consultant on ESG issues, including stewardship and engagement.

Stewardship - monitoring and engagement

The Trustee recognises that investment managers' ability to influence the companies in which they invest will depend on the nature of the investment.

The Trustee's policy is to delegate responsibility for the exercising of rights (including voting rights) attaching to investments to the investment managers and to encourage the managers to exercise those rights. The investment managers are expected to provide regular reports for the Trustee detailing their voting activity.

The Trustee also delegates responsibility for engaging and monitoring investee companies to the investment managers and expects the investment managers to use their discretion to maximise financial returns for members and others over the long term.

Investment manager engagement policies

The Scheme's investment managers are expected to have developed and publicly disclosed an engagement policy. This policy, amongst other things, provides the Trustee with information on how the investment managers engage in dialogue with the companies it invests in and how it exercises voting rights. It also provides details on the investment approach taken by the investment manager when considering relevant factors of the investee companies, such as strategy, financial and non-financial performance and risk, and applicable social, environmental and corporate governance aspects.

CARL ZEISS LIMITED PENSION & ASSURANCE SCHEME FINANCIAL STATEMENTS

Year ended 30 September 2020

ENGAGEMENT POLICY IMPLEMENTATION STATEMENT FOR THE YEAR ENDING 30 SEPTEMBER 2020 (continued)

Links to each investment manager's engagement policy or suitable alternative is provided in the Appendix.

These policies are publicly available on each investment manager's website.

Exercising rights and responsibilities

The Trustee recognises that different investment managers should not be expected to exercise stewardship in an identical way, or to the same intensity.

The investment managers are expected to disclose annually a general description of their voting behaviour, an explanation of the most significant votes cast and report on the use of proxy voting advisers.

The investment managers publish online the overall voting records of the firm on a regular basis.

The Trustee does not carry out a detailed review of the votes cast by or on behalf of its investment managers but relies on the requirement for their investment managers to provide a high-level analysis of their voting behaviour.

The Trustee considers the proportion of votes cast, and the proportion of votes against management to be an important (but not the only) consideration of investor behaviour.

The latest available information provided by the investment managers is as follows:

| Voting behaviour | | | |
|---------------------------------------|-----------------------|---------------------------------|---|
| Investment manager | Period | Proportion of votes cast | Proportion of votes against management |
| Legal & General Investment Management | 31/12/2018-31/12/2019 | 96% | 17% |
| Partners Group | 31/03/2019-31/03/2020 | 100% | 6% |

Trustee's assessment

The Trustee will be undertaking a review of each manager's environmental, social and governance policies or their voting and engagement activities and accepts that the way in which investment managers exercise their rights and engagement activities may differ from the Trustee's policies as set out in the Statement of Investment Principles.

The Trustee recognises that engagement and voting policies, practices and reporting, will continue to evolve over time and intends to review the way in which they monitor and engage with their investment managers over the next year.

The Trustee is supportive of their investment managers being signatories to the United Nations' Principles for Responsible Investment and the Financial Reporting Council's UK Stewardship Code 2020.

**CARL ZEISS LIMITED PENSION & ASSURANCE SCHEME
FINANCIAL STATEMENTS**

Year ended 30 September 2020

**ENGAGEMENT POLICY IMPLEMENTATION STATEMENT FOR THE YEAR ENDING 30
SEPTEMBER 2020 (continued)**

Appendix

Links to the engagement policies for each of the investment managers can be found here:

| Investment manager | Engagement policy | Annual disclosure statement |
|---------------------------------------|---|---|
| Legal & General Investment Management | https://www.lgim.com/landg-assets/lgim/document-library/capabilities/lgim-engagement-policy.pdf | https://www.lgim.com/landg-assets/lgim/document-library/capabilities/lgim-approach-to-corporate-governance-and-responsible-investment.pdf |
| Partners Group | https://www.partnersgroup.com/en/sustainability/we-are-responsible-investors/our-policy-and-methodology/ | - |
| | | |