EsopCentre

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it's our business

newspad of the Employee Share Ownership Centre

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In this issue

From the life president

Congratulations to Michael Mainelli on his official election as Lord Mayor. He takes on a world role vital for the future of the UK and of the values which drive the Centre.

Meanwhile the world is not standing still. France has a different and arguably more successful approach to employee financial participation than we do in the UK. Several stories in this edition are worth reading from that perspective. French companies are certainly more likely to reach a level of ten percent employee ownership as opposed to the fractions of a percent normal in the largest UK companies.

High payouts to employees feature in the news from KKR as a result of buying companies, rewarding employees with options and then selling the deal on to a third party. In this way employees both remain invested and cash in substantial interim funds. From the US also comes further news of support for employee ownership at state level, in addition to the national effect of the main parties working together. David Binns of Esop Services is an old friend of the Centre now re-emerging as an ally in bringing more of the American approach to Europe.

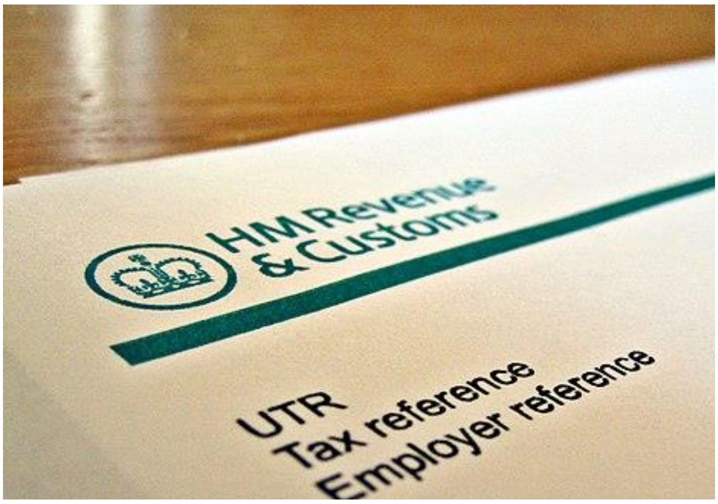
The Centre wants to see employees' lives not merely enhanced but transformed by financial participation. This in turn will help usher in a better world in Michael's Lord Mayoral year, while his colleagues Mike Wardle, Robert Pay and Juliet Wigzell step forward to maintain the momentum.

Malcolm Hurlston CBE

Centre responds to taxation of EOTs and EBTs consultation

The Centre submitted a detailed response to the government's open consultation on the taxation of employee ownership trusts and employee benefit trusts in September. The submission closely followed that of Centre steering committee member and Esop barrister David Pett, with additional input from the committee.

Our chief call was for the underlying policy objective to be amended to "enable employees to share in the growth in value of the business to which they contribute by their labour". The current tax regime for EOTs does not achieve that. Follow the link to read in full.



Michael Mainelli becomes Lord Mayor Elect

Alderman Professor Michael Mainelli, Lord Mayor Elect

In a press release on September 29, Z/Yen Group announced that its chairman, Professor Michael Mainelli, had been elected as the 695th Lord Mayor of London.

The team at Z/Yen is looking forward to Professor Mainelli's time as Lord Mayor, which is the highlight of Z/Yen's ongoing commitment to the City.

Alongside providing a sabbatical year, Z/Yen is giving logistical and infrastructure support for the Lord Mayor's Knowledge Miles webinar series, which will run throughout the year with support from the Gresham Society.

Mike Wardle, ceo of Z/Yen said:

"Michael Mainelli's election as Lord Mayor is a proud moment for Z/Yen. We have been planning for this possibility for some time, with his earlier release from Z/Yen to undertake the role of Sheriff of London for two years. We wish Michael every success in his Mayoral year and with the development of the Knowledge Mile, and we continue to support the City of London in its work."

TOP STORIES

How Eso can aid social mobility and levelling-up

In the latest article for Z/Yen Group's Pamphleteers Blog, David Craddock writes about the contribution of direct employee share ownership to social mobility and levelling-up. The article demonstrates that direct employee share ownership (operating alongside the sister policies) represents the internal engine within the company for corporate economic growth, wealth creation for employees, and the potential for positive change within the wider community.

AWARDS

Newspad awards 2023

Submissions are now open for the 2023 *newspad* All-Employee Share Plan Awards. The *newspad* awards recognise the achievements of companies which offer employee share plans and hold up best practice models for other companies to follow. Companies can nominate themselves or advisers can make submissions on behalf of their clients. The deadline for all nominations is 5:00pm on Friday January 12 2024.

The award categories this year are:

1. Best all-employee share plan

All-employee share plans help spread the wages of capital and boost company productivity and can be a particularly effective way for a large, or multinational, company to bring together a diverse workforce to help achieve key corporate goals. Employee engagement can be vital too to small or fledgling businesses: employee share plans give employees a stake in the company. Applications to this award category will be judged on how successfully the share plan meets the company's objectives, for example: in inclusivity within the company's workforce as a whole; or in the light of the complexities of cross-border arrangements; or in how the share scheme has been used to benefit employee and business alike.

newspad

2. Best share plan communications

Communication is key to the success or failure of an all-employee share scheme. This award category highlights the need for communications programmes that are sensitive to the circumstances of the company and the make up of its workforce.

3. Best use of technology, AI or behavioural science

Without effective technological solutions, all-employee share plans would be prohibitively expensive and time consuming for many companies. This award category recognises innovative uses of technology to manage, communicate and administer share schemes.

4. Best share plan response to significant changes or challenging situations

Since 2020, the pandemic, global crises, rising inflation and the cost of living has brought many challenges to business, not least of which is the change to working life and finances. All-employee share plans can play a key part in rising to such challenges by contributing to employees' savings, morale and engagement. This award is designed to recognise ingenuity in either adapting a share plan or in creating a special plan to fit the shifting landscape or alleviate some of the pressures that arise from extraordinary situations.

The awards present a great opportunity to celebrate your achievements. Clarity matters more than length.

Rules of entry can be viewed on the Awards 2023 webpage: https://esopcentre.com/metapages/awards/.

To submit an application for the *newspad* all-employee share plan awards, please complete both stages:

- ★ Online application form - complete all sections of the online form, providing as much detail as possible. (Alternatively, entries can be made by one or two explanatory documents)
- ★ Supporting documentation - where appropriate, back up your application with supporting documentation. Either upload the files at the end of the form, or email them to esop@esopcentre.com.

Please read the rules and terms of entry. The winners will be decided by two impartial judges, experts in the use of employee equities, plus Malcolm Hurlston CBE, founder of the Esop Centre. The finalists will be announced in *newspad*. Award certificates will be presented during the Centre's British Isles Symposium 2024. For queries, please contact esop@esopcentre.com or call +44 (0)20 7562 0586.

EVENTS

British Isles Share Plans Symposium – April 25 2024

The *newspad* awards presentation will close the next British Isles Employee Share Plan Symposium, on the afternoon of Thursday April 25 2024, at the central London offices of White & Case.

The programme will include interactive panel sessions based on content accessible in advance online. Please contact the team at esop@esopcentre.com if you are interested in taking part.

Online round-table – October 25

Come and join us for an online round-table discussion at 11:00am on Wednesday October 25. The event will be chaired by Centre chairman Robert Pay and the conversation will be kicked off by Equiniti's Jennifer Rudman.

Topics covered include:

⇒ Further drop in the annual dividend allowance: should Dividend Shares be offered (if not already), where there is a choice of cash/Dividend Shares?

⇒ SAYE bonus rate – how's it going, what's happening in practice

⇒ What happens next with the Call for Evidence on SAYE and SIP and the consultation on taxation of EOTs and EBTs.

Plus a pick of articles featured in recent editions of *newspad*. Registration is open.

MOVERS & SHAKERS

Computershare to buy share plan business from Solium Capital

Centre member, Computershare announced that, subject to customary closing conditions, it has agreed to acquire the European public equity employee share plan business from Solium Capital UK (trading as Shareworks by Morgan Stanley, which is too a Centre member).

In a press release, Francis Catterall, ceo of Computershare Employee Share Plans, said: "The clients and team from Solium Capital UK are a natural fit for Computershare and will help us further enhance our ability to provide market-leading share plans to clients in the UK and Europe.

"Computershare has invested heavily in its employee share plans business in recent years, including upgrading clients to our EquatePlus platform and ensuring we continue to have the most robust regulatory frameworks.

"As such we are best placed to provide continuity of services through our experienced team, leading technology systems and ability to help clients meet the growing complexity of UK and European regulation.

"The acquisition is a key development in our strategy of focusing on employee share plans as a key pillar of Computershare and this latest investment further demonstrates our commitment to the employee share plan industry."

UK recovery from pandemic faster than thought

The *Guardian* reported that the UK economy's recovery from the Covid-19 pandemic has been faster than previously thought, according to updated GDP data.

UK GDP is now estimated to be 1.8 percent above pre-pandemic levels by the second quarter of this year, according to the Office for National Statistics.

That is a stronger recovery than Germany's (whose economy is 0.2 percent larger than in Q4 2019) and France (1.7 percent larger). But, it still leaves the UK behind the US, Canada, Italy and Japan.

In August, the ONS had thought the UK economy was still 0.2 percent smaller than its pre-pandemic levels.

UK facing permanent higher taxes, IFS think tank says

The Institute for Fiscal Studies (IFS) forecasts taxes will amount to about 37 percent of national income by the next general election, due in 2024.

The IFS report - on the eve of the Conservative conference - has reignited calls for tax cuts from Tory MPs. The government says taming price rises is its priority.

Next year, the government will collect upwards of £100bn more in tax compared to pre-2019 levels, the IFS says. This is not a direct consequence of the coronavirus pandemic, when government spending surged to keep the economy afloat, the think tank argues. Instead, it reflects decisions to increase government spending, the UK's ageing population and pressures on the health service.

Request for action on tax simplification

In April this year, the Institute of Chartered Accountants in England and Wales (ICAEW) together with the Chartered Institute of Taxation, Institute of Chartered Accountants of Scotland, Association of Taxation Technicians and Low Incomes Tax Reform Group, wrote to the Financial Secretary to the Treasury (FST), outlining the processes needed to enable the Treasury and HMRC to focus on simplicity in tax policy and administration.

The professional bodies sent a further joint letter to the Financial Secretary on September 15. That letter set out next steps, including:

⇒ formation of a regular discussion group (HMRC is working on the terms of reference for the group);

⇒ a request for publication of a plan or roadmap to signal government intention and commitment to tax simplification;

⇒ requesting thoughts on each of the nine recommendations set out in the original letter.

The letter also expressed concern that without a clear plan, focused resource, accountability and investment, it will be difficult to deliver meaningful simplification and build trust that simplification is genuinely being embedded in the policy making process and given adequate weighting.

Is everybody happy? I was until I read about the Happiness Index

In a piece on the recently published Happiness Index for the *Times*, consumer journalist Harry Wallop asked "Being able to measure workers' happiness is all well and good. But how do we actually improve it?"

Commenting, Centre president Malcolm Hurlston said: "It is clear from companies which use employee share schemes well that happiness is a by-product of work, given genuine commitment by employers."

EXEC REWARD

European shareholders contest more executive pay reports

European shareholders are increasingly contesting corporate executive pay reports, data showed on September 6, as investors unhappy with companies' approach to environmental and social issues vote against director remuneration.

The percentage of remuneration reports disputed by investors across seven countries reached 42.9 percent during the 2023 annual general meeting season, the highest in at least five years, according to an annual review by shareholder engagement firm Georgeson.

Opposition to executive pay looks likely to increase too, as big asset managers including BlackRock and State Street adopt so-called devolved proxy voting rights to end investors, who may vote differently from institutional shareholders.

European shareholders remain reluctant to vote against directors because it is considered more confrontational, though that is likely to change as investors' environmental and social concerns grow.

Damian Carnell of Centre member CORPGRO commented: "*Directors' remuneration is a highly sensitive corporate matter.*

"First is the delicate issue of setting the directors' total earnings opportunity. This must be fully competitive, but also seen as fair by shareholders and others.

"Secondly, the selection of performance metrics, the performance targets and linked pay-out amounts, signal strongly the intended future direction, and performance expectation defined by the company itself.

"In recent years, investors have increasingly asked for ESG factors to be within directors' incentives. Across most advanced economies this is now commonly seen in listed companies alongside financial metrics to judge and reward success."

GameStop jumps as ceo takes zero salary

Shares of Gamestop climbed as much as seven percent on September 28 after the company announced billionaire activist Ryan Cohen would take the helm as chief executive officer for zero salary.

Cohen, who also has roles as chairman and president of Gamestop, is the largest investor in the brand that became a meme-stock phenomenon during the pandemic. He has a net-worth of about $3.2 billion, and owns a 12.1 percent stake in the retailer.

In the press release, Gamestop said Cohen "will not receive compensation" for the role.

Three months ago, the company fired then-ceo Matthew Furlong, a former Amazon executive. In the most recent quarter, Gamestop saw larger than expected losses and missed Wall Street estimates.

Workers strike in protest at huge exec pay rise

West Norfolk's largest housing association has denied handing out 36 percent pay rises to its executives – saying it "could not and would not" dish out those wages.

This came after staff at Freebridge Community Housing started a five-day strike as they protested against their own wage offer, claiming it paled in contrast to the company's "robust financial health".

This follows industrial action in August, with cleaning and maintenance staff arguing that they are struggling to pay bills while being paid "little more" than minimum wage.

"The total remuneration package for executives increased from £504,000 in 2021 to £686,000 in 2022, an increase of more than 36 percent," a Unite spokesperson said.

However, a Freebridge spokesman said: "Our published accounts show an increase of £182,000 in executive salaries between 2021 and 2022. This is true and is information in the public domain; however, that this is not what the executive received in pay rises.

"The increase in the main relates to the changing shape and number of our senior team as we have sought to navigate some very difficult challenges over the last few years."

Australia

How 120 workers made millions in KKR's Australian carbon play

KKR's Pete Stavros has announced the sale of GreenCollar, which represents its first broad-based ownership exit in Australia, and also a first for KKR's Impact fund. New employees made $35,000 and more tenured employees made 3-5x their annual salary.

Three years ago, global buyout giant KKR made an unusually small bet in Australia.

The firm, fresh from paying a few billion dollars for both Australian biscuitmaker Arnott's and software provider MYOB, spent about $100 million to buy into Sydney-based carbon and water projects developer and adviser GreenCollar.

KKR has invested in GreenCollar, as part of KKR's Global Impact strategy and marked the Global Impact Fund's first investment in Australia.

GreenCollar is a natural resource project development and environmental markets platform that specialises in using environmental markets, such as carbon markets, to enable landholders to implement projects that generate revenue and reduce greenhouse gas emissions. Since its establishment, GreenCollar has secured contracts to supply approximately 65 million Australian Carbon Credit Units (ACCUs) to be issued and delivered to the Emissions Reduction Fund, making it the largest player under the Scheme. The company is also pioneering the development of a Reef Credit Scheme, which enables a market-based solution for land managers to undertake projects to improve the water quality of the Great Barrier Reef in Australia.

Cayman

Centre key-note speaker, Dr Tasha Ebanks-Garcia, Representative of the Cayman Islands to the UK meets James Cleverly, UK Foreign Secretary at the 2023 Conservative Party conference.

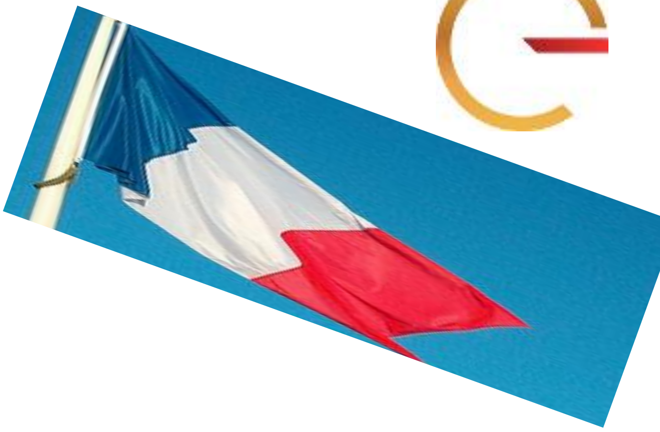
Panton seeks change to government borrowing limits set by UK

Premier Wayne Panton has approached the United Kingdom to request changes to the borrowing limits set out in the Framework for Fiscal Responsibility to assist Cayman with challenges related to climate change.

Panton, who is also finance minister, confirmed this to *the Cayman Compass* following queries on the status of the FFR, which he said remains "unchanged" at this time.

Cayman likely to come off money-laundering grey list, but new challenges await

The Cayman Islands should come off the global 'grey list' of countries not doing enough to fight money laundering and terror financing by the end of October, industry leaders have been told.



France

Renaulution Shareplan 2023

In a press release on September 5, Renault Group announced the implementation of its employee share ownership plan Renaulution Shareplan for the second consecutive year. This offer is open in 29 countries and will involve nearly 98,000 employees in the creation and sharing of value.

Compared to 2022, Renault Group has increased the contributions offered under the 2023 plan by 30 percent to benefit eligible employees from the success of the implementation of the stages of the Revolution. This significant increase will allow eligible employees to receive up to 16 shares free of charge, compared to the 12 shares awarded free of charge in 2022.

Luca de Meo, ceo commented: “By continuing the implementation of one of the most ambitious employee share ownership plans, all sectors considered, we are strengthening the unity of the Group. Renaulution Shareplan establishes the conditions for a better sharing of value, so that the Revolution benefits everyone within the company.”

The offer is open to employees of Renault Group and its consolidated subsidiaries that are members of the PEG of either Renault SAS, DIAC or Retail Renault Group (RRG), in 29 countries, subject to local authorisations required. To subscribe to the offer, the employee must have at least three months of continuous or discontinuous seniority between January 1 2022 and October 2 2023 and an employment contract (with a consolidated company and member of the PEG) in force on October 2 2023.

“Elis for All” 2023 employee share ownership plan

On August 31 industrial laundry service supplier Elis announced the launch of a new “Elis for All” 2023 employee share ownership plan.

This operation is part of the development of employee share ownership, which is an objective of the Elis Group and strengthen the sense of belonging of Elis Group employees by offering them the opportunity to be more closely involved in the future development and performance of the group.

The offering only comprises a “classic” formula with discount and employer matching contribution (abondement), under which the subscriber is fully exposed to fluctuations of the Elis share.

A common ceiling of two million (2,000,000) euros, representing 2,000,000 shares, applies to these two capital increases, i.e., 0.86 percent of the share capital at the date of the Management Board’s decision.

The “Elis for All” offer includes a 30 percent discount on the reference price and a matching contribution equal to one share offered for 10 shares subscribed.

France

Veolia offers new Esop to nearly 190,000 Group employees

On September 8, Veolia Environnement announced the launch of a new employee shareholding operation. This operation, offered to approximately 190,000 Group employees, aims to involve them in Veolia's development and performance. The settlement and delivery of the new shares to be issued is expected to take place on December 13 2023.

Capgemini launches its tenth employee share ownership plan

Capgemini's new employee share ownership plan is being offered to approximately 97 percent of employees and is part of its policy to link all employees with its development and performance. This Esop will be implemented through a capital increase reserved for its employees up to a maximum of 3,200,000 shares (i.e. 1.84 percent of outstanding shares), with settlement-delivery no later than December 19 2023. As the 2018 Esop reaches its term at the end of the year, this tenth plan will help maintain employee shareholding at around **eight percent** of Capgemini SE's share capital.

Employees will be able to subscribe to Capgemini shares within the framework of subscription leveraged and guaranteed formulas. These formulas will allow employees, until the shares become available, to benefit from a guarantee on the amount invested into this plan. The voting rights will be exercised by the holders who – depending on the formula and the context – will be an FCPE (Fonds Commun de Placement d'Entreprise), the employees via direct shareholding and/or the financial institution structuring the offer or its counterparties.

Success for Technip Energies first worldwide employee shareholding

On April 18 Technip Energies launched "ESOP 2023", an employee share operation offered to circa 12,000 eligible employees in 19 countries, with the aim of sharing with employees the co'pany's long-term value creation.

The operation was based on two offers: "ESOP Classic" and "ESOP Leverage", which were proposed as part of Technip Energies' Group Savings Plan and International Group Savings Plan.

On September 19 this year, 1,756,434 new shares were issued as part of the capital increase, representing 0.98 percent of issued share capital, with total proceeds from the capital increase of €29,999,892.72.

This first operation was a resounding success, with the volume of applications significantly exceeding the allocated envelope. More than 4,500 employees chose to subscribe to the ESOP 2023 offer, bringing the overall subscription rate to 33 percent.

The press release stated that this success is testament to the confidence and support of the teams for Technip Energies' strategy, as well as a strong sign of their commitment to the creation of long-term value that Technip Energies and its people are collectively building for the future.

India

Tax on Esops - How NRIs can navigate the rule book

According to *Moneycontrol.com*, Indian multinationals such as Infosys and Wipro are known for granting employee stock ownership plans to their employees. If you work at any of their overseas offices, the taxation of your Esops will depend on the tax rules of India, the country where these companies are based, and of the country where you reside.

Taxation matters can be complex and more so when they involve more than one country. If you are an Indian resident participating in an Esop of an Indian company as part of your compensation package, the taxation of such is clearly laid out under Indian tax laws. You get taxed at two stages – one, when you exercise your right under the Esop to buy the shares and two, when you sell these shares. At the first stage, you get taxed on the perquisite value at your income tax slab rate. At the second stage, you get taxed on the capital gains, if any.

The taxation of Esops, however, gets complex if you are an NRI (non-resident Indian). Do you, then, get taxed based on the taxation rules of India or of the other country?

USA

IRS's Esop warning shouldn't signal an enforcement sea change

The IRS issued a notice in August warning plan sponsors to be alert to compliance issues associated with employee stock ownership plans. The notice used broad and vague language cautioning "higher-income taxpayers and businesses" against implementing "aggressive schemes involving complex or questionable transactions, including those involving Esop" to avoid paying the "taxes they [rightfully] owe."

Unfortunately, in doing so, the IRS didn't provide specifics on what it thought could be questionable or impermissibly structured to avoid the proper taxation of income.

As a result of the imprecise language, this notice has created a wave of concern in the Esop community, with questions focused on IRS scrutiny in an area where enforcement has historically and primarily been driven by the Department of Labor. Among other concerns, plan sponsors question whether the IRS's bulletin sets in motion new and perhaps contradictory rules concerning Esop enforcement and the retroactivity of such enforcement on Esops that have recently been a party to one or more stock sale transactions.

USA

Department of Labor recovers $22.5M for Esop

The Department of Labor has recovered $22.5 million from an employee stock plan's former trustee, Reliance Trust Co, for its overpayment for a recreational rental company's stock after a federal judge in Arizona approved a consent judgment.

Senior US District Judge Roslyn O Silver, who presided over the lawsuit in US District Court for the District of Arizona, compelled Reliance to pay the settlement to the RVR Employee Stock Ownership Plan, according to the consent judgment filed last week. The consent judgment directed Reliance to distribute recovered monies to the accounts of individuals who were participants in the plan as of May 28, 2014, or to individuals who were participants but have since closed their plan accounts.

Silver directed Reliance or its insurers to pay $20,454,545—the settlement amount, within 30 days of the court's August 30 entry of the consent judgment, the DOL stated in the press release. Charges against individual defendants in the case remain ongoing.

Deadline coming for clawback provisions in executive pay policies

Public companies have until December 1 to update or add new clawback provisions to their executive pay policies in order to comply with regulations the US Securities and Exchange Commission (SEC) finalised last year.

Clawback provisions are an increasingly common feature of executive compensation packages, according to Anne Tyler Hall, an attorney with Hall Benefits Law in Atlanta. Their purpose is to enable companies to recover incentive pay if an executive's decisions turn out to be ethically and legally questionable, thus imposing financial and reputational liabilities on the company.

In 2002, the federal Sarbanes-Oxley Act required public companies to have a clawback rule that applies only when misconduct by ceos or cfos results in a financial restatement to federal authorities.

USA

Missouri governor signs bill reauthorising Esop tax deduction

Jefferson City Governor Mike Parson signed legislation last month that will help ensure Missouri businesses remain in Missouri. At a ceremonial signing event at the state capitol, Gov Parson signed SB 20, sponsored by Sen Mike Bernskoetter (R-Jefferson City), which reauthorises the employee stock ownership plan tax deduction.

The Missouri Chamber of Commerce and Industry strongly supported the extension of this valuable tool that promotes employee ownership and fosters a positive business environment in the state.

“We believe Esops are incredibly important, especially when we’re in a global competition for jobs and talent,” said Dan Mehan, president and ceo of the Missouri Chamber. “Employee-owned businesses often exhibit higher levels of employee satisfaction, increased productivity and greater long-term stability. In turn, these companies contribute to the local economy, driving growth and job creation. This Esop tax deduction plays a crucial role in facilitating the transition to employee ownership, making it more financially viable for businesses.”

In 2016, Missouri lawmakers created a 50 percent income tax deduction on the proceeds business owners receive when they sell their companies to their employees. The incentive was intended to encourage businesses to go the Esop route versus selling to a competitor or passing the business to out-of-state ownership.

MO Gov. Michael "Mike" Parson Courtesy of Missouri State Archives

Senate Bill 20 repeals the 2022 sunset of the legislation and extends this successful incentive programme.

“We have witnessed firsthand the positive impact of employee ownership in Missouri,” Mehan said. “It is our firm belief that extending the Esop tax deduction found in SB 20 will further encourage and support locally-owned businesses, leading to a stronger and more prosperous economy.”

The Missouri Chamber of Commerce and Industry is the largest business association in Missouri. Together with the Missouri Chamber Federation, the Missouri Chamber represents more than 75,000 employers.

USA

Esop exploration: Can the 'new' ownership model age well?

Most CPA firms are steeped in the partner model of ownership, but one of the country's largest firms recently opted to break with that model by establishing an employee stock ownership plan (Esop).

No firm the size of BDO USA has previously gone the Esop route, but it's a road that has long been travelled by a midsize firm in Minnesota that opened the door for more firms to consider the Esop model.

Redpath and Company, based in St Paul and employing about 200 people, has been an Esop for about 20 years. The S corporation began offering an Esop to all employees in 2003 — a few years after founder Jim Redpath successfully lobbied Congress to allow S corporations to offer Esops.

Jim Redpath retired last year, cashing out his share of the Esop trust just like every other departing employee with at least one year of service has done over the past two decades.

"I would say it's been a success because it allowed us to grow. When we became an Esop in 2003, I think we were a $5 million firm. We're a $42 million firm now," said Mark Gibbs, CPA, CGMA, managing partner at Redpath.

When Redpath made the transition in 2003 — for the sake of its employees, its commitment to independence, and for the tax benefits — Gibbs was the newest of the company's seven partners. The number of partners has tripled since, but their ownership doesn't work the same way it did before 2003. They have a salary-based stake in a trust comprising Redpath stock.

But, unlike the traditional model, neither the partners — nor co-workers who are beneficial owners through the trust — have to invest a penny of their own money to be invested in the Esop.