

Mencap Pension Trustee Limited Implementation Statement

31 March 2026



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1. Background

In 2019, the Government published the Occupational Pension Schemes (Investment and Disclosure Amendment) Regulations 2019.

These regulations introduced new requirements for pension schemes, setting out the policies they need to include in the Statement of Investment Principles (SIP), which is the document that governs the way the Plan's assets are invested. The expanded legislation required the SIP to include the Trustee's policies on how it takes account of Environmental, Social and Corporate Governance (ESG) considerations when setting investment strategy, and how it exercises voting rights, and undertakes engagement activities with, those they invest in.

ESG criteria are a set of non-financial indicators relating to a company's operations that are used by investors to evaluate corporate behaviour and to determine how it may influence the future financial performance of companies. Environmental criteria consider how a company performs as a steward of nature. Social criteria examine how it manages relationships with employees, suppliers, customers, and the communities where it operates. Governance deals with a company's leadership, executive pay, audits, internal controls, and shareholder rights.

In addition, the regulations introduced a requirement for Trustees to produce a statement setting out (amongst other things) how the Trustee has followed the SIP over the year, and in particular how it has implemented its policies on the exercise of voting rights attaching to its investments and engagement activities. This document, referred to as the Implementation Statement, provides information on how, and the extent to which, Mencap Pension Trustee Limited (the "Trustee"), acting as trustee of the Mencap Pension Plan (the "Plan"), has followed good stewardship practices during the 12 months to 31 March 2026.

This statement covers the period from 1 April 2025 to 31 March 2026 (the "Plan" year).

Up to 31 March 2025, the Plan had both a Defined Benefit (DB) section and a Defined Contribution (DC) section.

The DC Section of the Plan closed to new contributions at the end of the previous Plan year, on 31 March 2025. The majority of the Plan's DC assets were transferred into the Aegon Master Trust on 4 September 2025, including all member accounts. At that time, residual DC Plan assets remained in respect of four death cases that were still in progress. Two of these cases were completed shortly after the transfer. For the remaining two cases, the Trustee was unable to contact the next of kin and, having taken legal advice, obtained death certificates for the two members. The value of their pots, totalling £10,911.64, was transferred to the Trustee bank account on 27 March 2026. This amount will be held until the next of kin can be established and payment can be made.

As at 31 March 2026, there were no members remaining in the DC Section of the Plan and no residual DC assets held within the Plan. As such, during the period covered by this statement, responsibility of the governance of the Plan's DC investments had already passed to the Trustees of the Aegon Master Trust.

As at 31 March 2026, the value of DB assets was £88m.

2. Defined Benefit (DB) Section

Introduction

The Directors of the Mencap Pension Trustee Limited (the 'Trustees') are obliged, acting in their capacity as trustee of the Mencap Pension Plan (the 'Plan'), to prepare a yearly statement setting out how they have complied with the Statement of Investment Principles (the 'SIP'), including:

- a description of any amendments to the SIP during the period covered by the statement.
- how and the extent to which, in the opinion of the Trustees, compliance with the SIP has been achieved.
- how the Trustees have demonstrated good stewardship over investments, which includes:
 - o a demonstration of compliance with policies on investment rights (including voting) and engagement described within the SIP.
 - o a description of voting behaviors made by or on behalf of the Trustees.
 - o a statement on any use of the services of a proxy voter.

This statement relates to the period from 1 April 2025 to 31 March 2026 (the 'reporting period') and has been prepared in accordance with regulatory requirements and guidance published by the Pensions Regulator. This statement is based on the SIP that applied during the reporting period, the latest of which is available at the following link: <https://www.mencap.org.uk/about-us/mencap-pension-plan>

Governance

The Trustee meets formally every quarter (and more often if required) to consider the progression of the funding position and investment performance. This will include a review of the performance of the assets relative to objectives and underlying risks, the economic outlook, and the manner in which the assets are invested. To aid this review, the Trustee will primarily rely on reports and advice received from its fiduciary manager, Van Lanschot Kempen UK Investment Management (VLK).

Amendments to the SIP

There were no material changes to the governance arrangements of the Plan during the reporting period, nor to the investment policy, nature of risks, or stewardship practices. As a result, the SIP was not amended during this reporting period.

Compliance with the SIP

The Trustees monitor compliance with the SIP annually. In particular, the Trustees obtain confirmation from VLK and other advisors that they have complied with the relevant SIP (insofar as is reasonably practicable) in accordance with Occupational Pension Schemes Regulations.

In particular, the Trustees have received periodic investment reports and investment updates from VLK that provide:

- details of the asset allocation and compliance of these allocations with the investment policies specified in the SIP.
- details of the value of the Plan's investments, and the estimated value of the liabilities from which an estimated funding position can be determined.
- progress of the funding position with respect to funding targets.

- details of the performance of the individual investments, including relative to a benchmark.
- details of the performance of the total investments, including relative to the target return and investment objectives.
- details of the hedging of the interest rate and inflation risks associated with the liabilities, and whether the hedging is working as expected, and compliance with the bandwidths specified in the SIP.
- details of the investment risk of the underlying investments, and the change in the total investment risk over time.
- details of the underlying investment managers used in the Plan's portfolio.
- details of the engagement behaviour of both VLK and the underlying investment managers, including their voting behaviour.
- the responsible investment characteristics of the underlying investments.

The Trustees have reviewed the information provided by VLK and its other advisors, and are satisfied that the policies set out in the SIP have been followed, including:

- investing the assets according to the investment policy and the investment strategy advised and implemented by VLK.
- choosing suitable investments to achieve the right balance between risk and return, with a focus on security, quality, liquidity, and profitability of the Plan's assets.
- managing the key investment risks of the Plan appropriately.
- monitoring the underlying managers of the investments, and the performance of those managers relative to the objectives.
- managing Environmental, Social, and Governance ('ESG') risks where financially material (note that non-financial factors, such as member views, are not taken into consideration).
- exercising of the rights (including voting rights) attaching to investments.

A summary of the stewardship behaviour of both VLK and a selection of the underlying investment managers they appoint on the Trustees' behalf is provided in the sections below. This includes information on voting behaviour, and votes considered significant by each of the investment managers. The Trustees have no influence on the managers' definitions of significant votes but have noted these and are satisfied that they are all reasonable and appropriate. It also includes information on the engagements undertaken by investment managers with the companies/issuers in which they invest.

3. Stewardship – VLK monitoring and engagement behaviour

Background

The Trustees do not monitor or engage directly with issuers or managers of debt or equity investments but instead delegate this activity to VLK and to the underlying investment managers appointed by VLK. The Trustees expect VLK to undertake regular monitoring and engagement in line with its own corporate governance policies, taking account of current best practice, including the UK Corporate Governance Code and the UK Stewardship Code. The remainder of this section provides insights into VLK's responsible investment and engagement activities which have directly and indirectly helped the Trustees with their stewardship responsibilities.

VLK expects the underlying investment managers they select to exercise rights attached to their investments, including voting rights, and to engage with issuers of debt and equity (and other relevant persons) about matters such as performance, strategy, management of actual or potential conflicts of interest, and ESG considerations. ESG criteria are defined as a set of non-financial indicators relating to a company's operations that are used by investors to evaluate corporate behaviour and to determine how it may impact the future financial performance of companies. Environmental criteria consider how a company's interaction with the natural environment may affect its performance. Social criteria examine how it manages relationships with its stakeholders (employees, suppliers, customers, local communities etc.). Governance deals with a company's leadership, executive pay, audits, internal controls, and shareholder rights.

There are several levels of engagement at VLK: they engage with the investment managers they appoint, with companies in which they invest directly (e.g., within VLK-managed investment products), and via collaborative engagement with industry stakeholders, such as regulators, industry initiatives, benchmark providers, and peers.

VLK monitoring of investment managers

VLK has limited influence over external investment managers' investment practices (particularly where assets are held in pooled mutual funds). However, throughout the last 12 months, VLK has encouraged its appointed managers to improve their own stewardship and engagement practices and consider ESG (risk) factors when making investment decisions.

When assessing investment managers, VLK bases its ESG criteria on international conventions and initiatives, such as the UN Global Compact and the UN Principles for Responsible Investment (PRI).

VLK has created a proprietary scoring framework ('the Sustainability Spectrum') to help them understand and evaluate how investment managers integrate various ESG factors into their investment processes. This framework assesses investment managers on six core pillars:

1. **Commitment to Responsible Investment:** policies and objectives relating to responsible investment.
2. **ESG Integration:** incorporation of ESG factors into investment processes and decision making.
3. **Active Ownership:** voting and engagement with underlying companies/issuers.
4. **Evidence & Transparency:** reporting and disclosure on ESG issues.
5. **Exclusion:** policy on avoidance of controversial sectors and companies with high ESG risk.
6. **Impact:** framework for measuring and managing environmental and social impacts.

Framework for assessing investment managers on ESG factors

Within this framework, investment managers and their products are classified into one of five different levels: Compliant (level 1), Basic (level 2), Avoid harm (level 3), Do better (level 4), Do good (level 5).

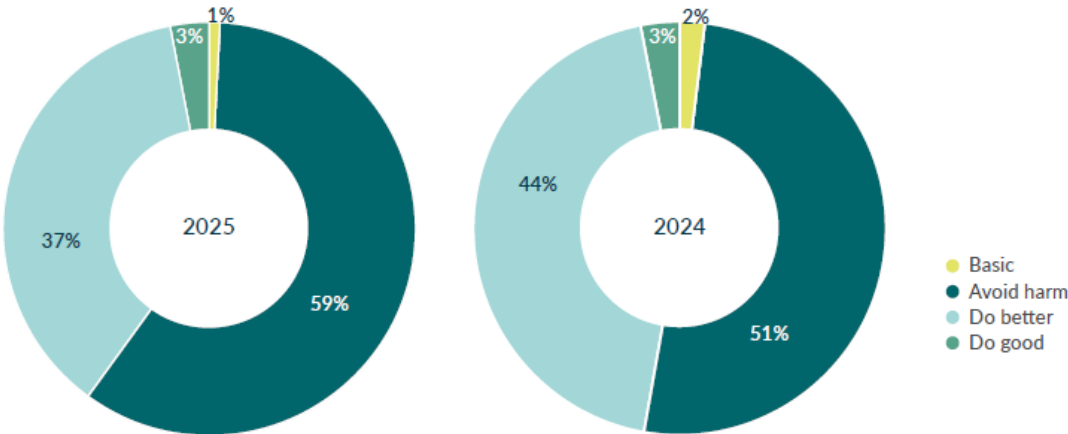
Five flavours of the Sustainability Spectrum



VLK’s scoring of investment funds

In 2024, VLK assessed 394 mutual funds. Each fund was assigned a score on the Sustainability Spectrum. These assessments are conducted by their Manager Research Solutions team, with research and conclusions shared across the organisation.

Sustainability Spectrum scores of investment managers



VLK highlights in 2025

The Trustee notes VLK's commitment to integrating ESG into their investment offering, both directly relating to the Plan and across their wider business. For example, during 2025, across their wider business, VLK:

- Assessed 352 mutual funds on ESG criteria (see above). This included assessments across six key ESG areas: Responsible Investment, ESG Integration, Active Ownership, Transparency, Exclusion, and Impact.
- Proactively engaged with 15 different external investment managers across 21 different engagements (covering 43 mutual funds), with 19 of these 21 engagements focused on environmental or social issues.
- Proactively engaged directly with 90 companies across 97 separate engagements, with 71 of the 97 engagements focused on environmental and social issues.
- Voted at 533 company shareholder meetings, with 16% of votes cast against management recommendation where VLK believed a dissenting vote was warranted.
- Reviewed the Exclusion Policy, which applies across the entirety of the assets VLK manage (including its fiduciary management mandates). As the end of 2025, over 200 companies were excluded (primarily due to involvement in controversial weapons, tobacco, and international sanctions).
- Enhanced its biodiversity framework via increased integration of MSCI data input, specifically including metrics on ecosystem degradation intensity and wildlife impact.
- Expanded its Social Impact & Philanthropic Services team, which offers guidance on matters including gifts, bequests, and charitable donations.
- Improved its impact investment offering, including launching (i) a new infrastructure debt solution (funding sustainable energy sources) and (ii) a new real estate solution (funding construction of affordable senior housing).
- Reduced the Weighted Average Carbon Intensity (WACI) of its discretionary portfolios by 14%, considerably ahead of its 7% annual target.
- Increased collaboration with Climate AI, which leverages advanced machine learning and over 100 global climate models to assess risk posed from a changing climate.
- Increased the scope of ESG data points available to UK clients via VLK's Investment Management Portal, allowing the trustees of UK pension schemes to view real-time ESG information on their portfolios.
- Remained signatories to the UK and Dutch Stewardship Codes, Net Zero Asset Managers Initiative, Climate Action 100+, UN Global Compact, UN Principles for Responsible Investment, and dozens of other industry-wide sustainability initiatives.

VLK highlights in 2025

VLK appoints a number of investment managers to manage assets in the Plan's portfolio. Below are some specific engagement examples to demonstrate how VLK are monitoring and engaging with some of the Plan's underlying managers on stewardship and ESG issues.

Manager engagement example – Insight

Insight – Fixed income engagement framework	
Investment manager	Insight
Fund/Mandate	Maturing Buy and Maintain Credit Funds (investment grade fixed income)
Rationale for engagement	VLK requested an update on Insight's engagement framework, its outcomes, and implications for their portfolios.
Summary	VLK wanted to better understand Insight's engagement framework, particularly whether their engagements impacted portfolio construction. VLK were pleased to note that, generally speaking, Insight had engaged with a broad range of companies across a range of topics. Last year, in two cases, the lack of progress on engagements with the companies had resulted in Insight not adding to their existing position on ESG grounds. Insight explained that they have divided their engagement activities into three main categories. (1) Issuer-specific engagements that are led by the credit analysts and are driven by materiality as a key criterium. (2) Thematic engagements that are led by Insight's Responsible Investment team (RI team) and focus on long-term sustainability risks. (3) Macro engagements that are also led by the RI team with a focus on industry cooperation and broad market initiatives. On the thematic engagement side, the key themes are (a) climate change, (b) natural capital, and (c) labour management (which is expected to be replaced by "responsible artificial intelligence" in 2026). Engagements with issuers actively feed into their views on companies. In particular, climate considerations play a large role.
Conclusion	VLK notes that Insight has a well-developed sustainability approach, especially that they conduct internal analysis on companies themselves using both external and internal inputs. In particular, VLK views their climate transition framework as strong.
Next steps	No immediate steps, but VLK will continue their ongoing dialogues on the sustainability elements of their buy-and-maintain strategies.

Manager engagement example – Insight

Insight – counterparty engagement	
Investment manager	Insight
Fund	Insight Liquidity Funds (money market fund)
Rationale	VLK wanted to investigate how Insight engages with the counterparties used in its liquidity funds (mainly banks and other financial institutions).
Summary	VLK wanted to better understand the Counterparty Engagement Monitoring Exercise to ensure that ESG considerations were adequately considered in investment processes. In particular, VLK wanted to ensure that climate considerations were being actively integrated into investment analysis. Insight first started their biannual Counterparty Engagement Monitoring Exercise in 2022 and are going into their third iteration of the process in 2026. This is a tailored framework specifically for money market counterparties. In the latest questionnaire, they received responses from 22 of the 26 questionnaires they distributed, representing c.95% of investments. Insight explained that their Counterparty Engagement Monitoring Exercise follows a 7-step process, including encouragement from the Insight CEO to complete the assessment. Insight's Responsible Investment team (RI Team) reviews the answers and ranks the counterparties; it also writes a feedback report to all counterparties to identify strengths and weaknesses. Weaker scoring counterparties are targeted for a follow-up with an ESG analyst and detailed engagements are carried out with relevant counterparties to discuss areas of underperformance. In the past couple of years, the process has resulted in 12 objectives being achieved based on Insight's feedback. Most of these are related to climate objectives. For example, Insight lobbied a major UK bank to integrate some of their recommendations into the bank's Sustainable Bond Framework, while they successfully lobbied a Canadian bank to strengthen the ties between ESG performance and executive remuneration. VLK were pleased to note the tangible outcomes that had resulted from the Counterparty Engagement Monitoring Exercise.
Conclusion	VLK appreciates Insight employing a tailored approach to stewardship for their money market strategies.
Next steps	Continue to monitor Insight, including their engagement activities.

Manager engagement example – Coolabah

Coolabah – ESG Review	
Investment manager	Coolabah
Fund	Pacific Coolabah Global Active Credit (investment grade bonds)
Rationale	VLK engaged with Coolabah to improve its ESG reporting and disclosures.
Summary	Coolabah is rated as '3' on VLK's Sustainability Spectrum, with its lower rating on 'Evidence and Transparency' reducing its overall score. VLK engaged directly with Coolabah to better understand how ESG considerations are integrated in its investment processes. During the engagement, VLK were pleasantly surprised by the quality and scope of Coolabah's ESG practices (the scope of exceeded VLK's original assessment during initial manager research and due diligence). In particular, their engagement activities were impressive. Coolabah's extensive network with issuers, brokers, and large financial institutions (especially global banks) allows them to leverage a deep network. Over the last 12 months, Coolabah has engaged with dozens of issuers and counterparties; in particular, VLK notes its engagements with global banks (which have tended to focus on climate frameworks and green bonds). During its discussions with VLK, Coolabah were able to provide analysis of their engagement activities. They were also willing to discuss their engagement activities in detail. VLK have since asked Coolabah to share (non-public) quarterly ESG disclosures so that they may better monitor Coolabah's ESG activities, especially their engagements.
Conclusion	Overall, Coolabah lags some of its peers in providing publicly-available reporting and transparency but demonstrates an appropriate level of ESG integration and implementation. They are also able to provide non-public reporting upon request.
Next steps	VLK will continue to monitor Coolabah's progress in formalising ESG reporting and evidence provision, while maintaining an active dialogue with Coolabah on engagement activities to ensure ongoing alignment with expectations.

4. Stewardship – Voting & engagement of the Plan's appointed managers

The Shareholder Rights Directive (SRD II) and The UK Stewardship Code 2020 both emphasise the importance of institutional investors and asset managers engaging with the companies in which they invest and stress the importance of exercising shareholder voting rights effectively.

Via VLK's monitoring and engagement activities, the Trustees encourages all underlying investment managers to be engaged investors. Furthermore, the Trustees encourage the managers to report on these activities and to disclose information about responsible investing on their website and in their reporting.

The assets are invested in a diverse range of asset classes. The intention of this section is to provide specific details of the voting and engagement behaviour overview and examples of the Plan's equity managers who manage equity investments which have voting rights attached, as well as the engagement behaviour of the Plan's fixed income credit/bond managers. Government bonds are excluded from this analysis.

While investment managers may have used proxy voting services, the Trustees have not used proxy voting services themselves during the reporting period.

Fund Information	
Fund manager	State Street Investment Management (SSIM)
Fund name	World TPI Climate Transition Index Equity Fund
Fund description	Developed Market Equity
Number of holdings	959
Voting Policy	
Please provide an overview of your process for deciding how to vote.	The State Street's (SSIM) Sustainability Policy establishes clear client-led viewpoints on the Sustainability Stewardship Service's four Sustainability Priorities: Climate Change; Nature; Human Rights; and Diversity. The Sustainability Service applies the following principles when considering shareholder proposals: • Every shareholder proposal voted by the Sustainability Stewardship team is reviewed on a case-by-case basis. • Shareholder proposals are considered in the context of how they align to long-term value creation for the specific company in question. • The Sustainability Service does not support shareholder proposals because they are aligned to one of the four sustainability priorities alone.
How, if at all, have you made use of proxy voting services?	SSIM uses ISS as a proxy voting service provider to implement SSIM's bespoke voting instructions The Sustainability Service partners with proxy advisory firms (including ISS) to: • Act as the proxy voting agent, including vote execution/administration. • Provide research/analysis relating to specific proxy voting ballot items. • Provide the service of splitting a ballot for the Sustainability Policy, which allows eligible investors to select this policy that will be applied to the eligible investor's pro rata shares of relevant funds.
What process did you follow for determining the "most significant" votes?	In compliance with the UK SRD II, SSIM have developed a framework that identifies our most significant votes for their UK clients. These include: • Votes on environmental- and social-related proposals. • Management proposals related to the Sustainability Policy (e.g., say-on-climate). Votes against the re-election of board members related to the Sustainability Policy. • Votes against management on compensation proposals. • Votes against management that relate to governance and reorganisation. • Votes against approving the auditors' actions for the financial year.

Significant Votes: **State Street World TPI Climate Transition Index Equity Fund**

	VOTE 1	VOTE 2	VOTE 3	VOTE 4	VOTE 5
Company Name	ENGIE SA	Holcim Ltd.	SSE Plc	Anheuser-Busch	Prosus NV
Summary of the resolution	Climate-Related Proposal (Opinion on the climate transition strategy)	Climate-Related Proposal (advisory vote on climate report)	Climate-Related Proposal (Receive the Net Zero Transition Report 2025 and reset frequency of voting)	Elect Director	Elect Director
How you voted	For	For	For	Against	Against
Rationale for the voting decision	Vote for as the company's disclosures and proposals were assessed for alignment with the Climate Transition Plan Disclosure Expectations outlined in SSIM's Sustainability Policy, which includes a framework for assessing decarbonisation strategies, climate risk, and climate governance.	Vote for as the company's disclosures and proposals were assessed for alignment with the Climate Transition Plan Disclosure Expectations outlined in SSIM's Sustainability Policy, which includes a framework for assessing decarbonisation strategies, climate risk, and climate governance.	Vote for as the company's disclosures and proposals were assessed for alignment with the Climate Transition Plan Disclosure Expectations outlined in SSIM's Sustainability Policy, which includes a framework for assessing decarbonisation strategies, climate risk, and climate governance.	Vote against the nominee as the board has failed to properly respond to SSIM's dissent against the last two consecutive pay proposals. Additionally, the nominee is a senior board member and the company does not meet minimum corporate governance standards for the market.	Vote against as the director nominee does not merit support as the company maintains the classified/staggered board structure. Additionally, there are potential concerns with disclosure on board demographics.
Outcome of the vote	Pass	Pass	Pass	Pass	Pass
On which criteria have you assessed this vote to be 'most significant'?	Environment	Environment	Environment	Governance	Governance

Fund Information		Response		
Fund manager	State Street Investment Management (SSIM)			
Name of the fund/strategy	World TPI Climate Transition Index Equity Fund			
Number of holdings in the fund/strategy	959			
Fund description	Global Developed Market Equity			
Engagement with portfolio companies				
How many total engagements were initiated (with entities held in the fund/strategy's portfolio)?				640
How many different entities did you engage with (that were held in the fund/strategy's portfolio)?				463
What % of entities did you engage with (as a % of total fund/strategy portfolio)?				74%
ESG Engagements				
Please provide the number of engagements by ESG topic:	Topic	Number of engagements	% of total engagements	
	Environmental	163	17%	
	Social	208	22%	
	Governance	577	61%	
	Other	-	-	
	Total	948	100%	
If you answered "Other", please describe	State Street (SSIM) classifies its engagements under multiple sub-topics. For example, an individual engagement may be classified as both "Environment" and "Governance", in which case this is counted twice in the table above.			
Engagement process				
Please describe your engagement process.	Based on feedback received from clients, the State Street's (SSIM) Sustainability Policy focuses on five sustainability priorities: Climate Change; Nature; Human Rights; Diversity and Human Capital Management (HCM). The Sustainability Stewardship Team participates in engagements with companies to obtain information that may help inform voting on items, articulate the viewpoints of the Sustainability Policy, and understand best practices with respect to the Sustainability Priorities and other sustainability topics. The Sustainability Stewardship Team endeavours to provide portfolio companies with useful information about the views of the Sustainability Policy.			

Engagement Case Study	
Fund manager	State Street Investment Management (SSIM)
Name of fund/strategy	World TPI Climate Transition Index Equity Fund
Name of entity you engaged with	The Hershey Company
Date of engagement	Q3 2025
Theme / topic of the engagement	Environmental – deforestation and other land use
Please describe your engagement process for this case study.	SSIM engaged The Hershey Company, an American confectionery company, to discuss their strategies and disclosures related to deforestation. During this engagement, SSIM aimed to understand how the company identifies and manages risks and opportunities related to these topics as well as gain insights into best practices, challenges, and industry trends. Hershey had disclosed that it is unlikely to achieve its goal to achieve a deforestation- and conversion-free supply chain for the forest-risk commodities it sources by the end of 2025; it highlighted key challenges and ongoing efforts to continue monitoring and managing deforestation-related risks. SSIM wanted to engage with Hershey to better understand this.
Please comment on the outcomes from this case study.	During the engagement, Hershey discussed that, while it is on track to be compliant with the EU Deforestation Regulation (EUDR), it continues to face challenges regarding the availability of data to certify its supply chain as deforestation-free. For example, while the company has achieved its goal to have 100% of its palm oil Roundtable for Sustainable Palm Oil (RSPO)-certified, only 69% of its palm oil supply chain is verified as fully deforestation-free. Hershey expressed that it faces challenges regarding the cost associated with data collection and tracing ingredients to the farm-level. The company expects this process to become more seamless and automated over time as technologies and satellite monitoring evolve to support enhanced traceability and verification. In the meantime, the company seeks to focus on forest restoration efforts, such as the Hershey Income Accelerator (which rewards farmers for implementing sustainable agronomic practices and supports efforts to ensure that children in the farming communities attend school). Hershey explained that it believed such programmes foster stronger long-term relationships and build supply chain resilience. SSIM will continue to monitor Hershey's progress on its biodiversity strategy and disclosures.

Fund Information	
Fund manager	Northern Trust (NT)
Fund name	NTCM Emerging Markets Low Carbon Plus Equity Index Fund
Fund description	Emerging Market Equity
Number of holdings	399
Voting Policy	
Provide an overview of your process for deciding how to vote.	Northern Trust (NT) views its voting at shareholder meetings as one of the best ways it can communicate its views to companies on behalf of clients. NT usually vote all our proposals. NT's Proxy Voting Policies, Procedures and Guidelines (the "Proxy Voting Policy") has a thoughtful approach to sustainability issues. The fundamental precept followed by NT in voting proxies is to ensure that the way shares are voted is in the best interest of clients / beneficiaries and will aim to maximise shareholder value. NT's Proxy Voting Policy, for example, stipulates that it generally encourages reporting that is not unduly costly or burdensome and which does not place the company at a competitive disadvantage, but which provides meaningful information to enable shareholders to evaluate the impact of the company's sustainability policies and practices on its financial performance. NT believes that it is important that its guidelines provide clarity regarding whether it supports certain proposals, in line with their understanding of best practices and factors material for shareholder value. Still, for some items it reserves the right to make discretionary, case-by-case decisions, driven by their knowledge of the company specific circumstances, analysis of its performance and our engagement success. It votes on a case-by-case basis for many environmental and social issues, where the company's sustainability performance would be the key consideration. Regarding shareholder sponsored resolutions as a long-term investment manager, it prioritises proposals with a clear, demonstrable material financial impact, ensuring that support is directed towards initiatives that provide tangible benefits and disclosure requests that are useful. It believes that each shareholder resolution requires careful analysis on a case-by-case basis to make informed decisions that align with clients' best interests.
Proxy voting provider	ISS. NT has delegated to an independent third-party proxy voting service (ISS) the responsibility to review proxy proposals and to make voting recommendations to the Proxy Committee in a manner consistent with NT's Proxy Voting Policy.
What process did you follow for determining most significant votes?	NT identifies as significant votes: (i) Shareholder proposals related to environmental and social issues where it voted against management and received significant levels of shareholder dissent ($\geq 30\%$ in developed markets and $\geq 20\%$ in EMs); (ii) Management proposals on executive compensation where NT voted against and received significant levels of shareholder dissent ($\geq 30\%$ in developed markets and $\geq 20\%$ in EMs).

Significant Votes: **NTCM Emerging Markets Low Carbon Plus Equity Index Fund**

	VOTE 1	VOTE 2	VOTE 3	VOTE 4	VOTE 5
Company Name	B3 SA-Brasil, Bolsa, Balcão	Equatorial SA	TOTVS SA	KGHM Polska Miedź SA	Suzlon Energy Limited
Summary of the resolution	Amend Restricted Stock Plan	Approve Remuneration of Company's Management and Fiscal Council	Approve Restricted Stock Plan	Amend Remuneration Policy	Approve Reappointment and Remuneration of Girish R. Tanti as Executive Director
How you voted	Against	Against	Against	Against	Against
Management recommendation	For	For	For	For	For
Rationale for the voting decision	Although there are no concerns with the proposed amendments, the plan grants full-value shares to executives and key employees in the absence of clearly-stated performance conditions, which may not adequately align the interests of its beneficiaries and those of the shareholders. A vote AGAINST this request is recommended.	Although Equatorial SA has provided reasonable disclosure regarding the remuneration paid directly by the company in 2024, such disclosure refers to only 2.75 of the 9.75 statutory executives reported by the company in the most recent fiscal year, raising concerns. As such, an AGAINST vote recommendation is warranted for this request.	A vote AGAINST this item is warranted because the proposed plan allows for the granting of full-value shares in the absence of publicly-stated performance conditions and, therefore, does not appear to adequately align the interests of its beneficiaries and those of the shareholders.	A vote AGAINST is warranted because a significant portion of performance indicators used in variable remuneration setting lack clear and measurable definitions. In addition, the company does not disclose weights of performance indicators as well as corresponding floor and cap values.	A vote AGAINST these resolutions is warranted in view of concerns in executive's remuneration because there are no disclosures on the performance metrics and (threshold and target) performance that he needs to achieve to determine the outcome under variable pay.
Outcome of the vote	Pass	Pass	Pass	Pass	Pass
On which criteria have you assessed this vote to be 'most significant'?	Dissent level: 49.6%	Dissent level: 42.3%	Dissent level: 40.5%	Dissent level: 37.2%	Dissent level: 31.5%

Fund Information		Response		
Fund manager	Northern Trust (NT)			
Name of the fund/strategy	NTCM Emerging Markets Low Carbon Plus Equity Index Fund			
Number of holdings in the fund/strategy	399			
Fund description	Emerging Market Equity			
Engagement with portfolio companies				
How many total engagements were initiated (with entities held in the fund/strategy’s portfolio)?				33
How many different entities did you engage with (that were held in the fund/strategy’s portfolio)?				29
What % of entities did you engage with (as a % of total fund/strategy portfolio)?				34%
ESG Engagements				
Please provide the number of engagements by ESG topic:	Topic	Number of engagements	% of total engagements	
	Environmental	23	16%	
	Social	38	26%	
	Governance	51	35%	
	Other	34	23%	
	Total	146	100%	
If you answered “Other”, please describe	‘Other’ topic captures engagements on Risk/Business Strategy. The ‘Total’ ESG engagements figure represents the number of topics covered across the engagements with 33 portfolio companies. Northern Trust (NT) may engage with an issuer on multiple ESG topics, so the number of ESG Engagements and the total engagements with portfolio companies will be greater.			
Engagement process				
Please describe your engagement process. (250 words max.)		NT’s engagement strategy, which is set out in its Engagement Policy, is implemented by a team of dedicated Stewardship professionals. It focuses on purposeful dialogue and covers the key risks and opportunities that we believe may impact a company’s returns. Engagement activities generally fall into three categories: 1. Engagement for information: Regular dialogue to build understanding of a company’s strategy, operations, and risks. 2. Engagement for accountability: Dialogue to hold management and boards accountable for oversight, decisions and performance. 3. Engagement for alignment and change: Targeted dialogue to drive changes that support long-term value creation.		

Engagement Case Study	
Fund manager	Northern Trust (NT)
Name of fund/strategy	NTCM Emerging Markets Low Carbon Plus Equity Index Fund
Name of entity you engaged with	China Mengniu Dairy Co., Ltd
Date of engagement	Q2 2025
Theme / topic of the engagement	Board Composition and Effectiveness – Gender Balance
Please describe your engagement process for this case study.	China Mengniu Dairy (“Mengniu”) is a leading dairy producer in China. As a fast-moving consumer goods company (FMCG), effective board oversight of talent and stakeholder expectations is crucial for long-term value creation. In 2023/24, the board had only one female director out of nine (~11%), falling short of NT’s minimum policy expectation of at least 20% female representation. The company cited challenges in identifying suitable female candidates within the FMCG sector. NT advocated for a targeted search and succession plan to improve gender balance. Consistent with its policy, NT voted against relevant director elections in 2023 and 2024; it also communicated its desire for better gender balance.
Please comment on the outcomes from this case study.	At the 2025 AGM, Mengniu appointed an additional female director, Lillie Li Valeur, increasing female representation to two out of nine (~22%), meeting the minimum threshold. Her appointment brings valuable expertise in brand management, digital transformation, and international FMCG markets, strengthening Mengniu’s global growth and innovation agenda. This progress is significant for both internal and external stakeholders, as it enhances board diversity, governance quality, and investor confidence in the company’s leadership.

Fund Information	
Fund manager	Man Group
Fund name	Man Alternative Risk Style Premia
Fund description	Hedge fund (quantitative; multi-asset)
Number of holdings	1,400
Voting Policy	
Provide an overview of your process for deciding how to vote.	Man Group's aim is to vote at all meetings for our holdings where there is the legal right to do so. Man Group generally votes on every holding in client portfolios unless otherwise restricted within separately-managed client accounts, or the client retains voting rights, or because of exposure to synthetic instruments. Man Group generally votes in accordance with the recommendations of its proxy voting service provider (Glass Lewis), based on the application of Man Group's custom policy. However, Man Group retains the right to determine the final voting decision. On occasion, an investment team may wish to vote in contradiction to the Man Group custom voting policy, which is then considered and actioned by the Stewardship Team, leveraging a conflict management framework for vote overrides. Investment teams are expected to be aware of the corporate structure and governance of portfolio holdings, both for material financial and material non-financial ESG issues. Man Group believes that a 'comply or explain' approach is the foundation of good corporate governance. While the proxy voting service provider operates a policy-based approach, it is recognised that there may be a good reason why non-standard corporate governance arrangements fit a company's particular circumstances. Should a company not sufficiently comply or effectively explain a failure to abide by best practices, Mn Group would expect the proxy voting service provider to recommend a vote against management recommendation.
Proxy voting provider	Glass Lewis
What process did you follow for determining most significant votes?	Man Group's voting framework uses screening to identify high-value meetings. This screening considers companies where Man Group holds meaningful stakes, alongside the ESG rating from a third-party provider (Sustainalytics). It also includes watch lists of sensitive securities, such as issuers Man Group is engaging with and high-profile events. Finally, all shareholder resolutions are reviewed and voted in house. • % of Shares Outstanding: Man Group holds a significant ownership stake • % of Fund AUM: total notional position of Fund assets is meaningful • ESG Rating: Poor ESG rating or severe controversy level • Watch lists: 'Issuers of interest' watch lists • Shareholder Resolutions: All shareholder resolutions.

Significant Votes: Man Alternative Risk Style Premia					
	VOTE 1	VOTE 2	VOTE 3	VOTE 4	VOTE 5
Company Name	Intuit Inc	Apple Inc	Align Technology, Inc.	Align Technology, Inc.	Citigroup Inc
Summary of the resolution	Shareholder Proposal Regarding Report on ROI of Diversity and Inclusion Programs	Shareholder Proposal Regarding Report on Risks and Costs Associated With China	Elect Joseph Lacob	Shareholder Proposal Regarding Right to Call Special Meetings	Shareholder Proposal Regarding Audited Report on Financial Statement Assumptions Regarding Climate Change
How you voted	Against	Against	Against	For	Against
Management recommendation	Against	Against	For	Against	Against
Rationale for the voting decision	Voted against as the proponent is a confirmed anti-ESG actor whose proposal, rather than improving transparency, is designed to negatively challenge Intuit's D&I programmes on ideological rather than investor grounds.	Vote against as the proponent has not detailed why the existing disclosures on supply chain risk are insufficient.	Vote against due to policy of generally voting against the ESG committee if the company does not have a human rights policy that is aligned with international standards, such as the Universal Declaration of Human Rights.	Vote for as a 10% threshold for calling a special meeting is appropriate	Voted against as the proponent is a confirmed anti-ESG actor whose proposal, rather than improving disclosure, is designed to undermine Citi's net zero commitments on an ideological basis rather than investor grounds.
Outcome of the vote	Failed	Failed	Passed	Failed	Failed
On which criteria have you assessed this vote to be 'most significant'?	Vote related to key stewardship theme (Equality); Shareholder resolution	Significant long equity holding within the fund; Shareholder resolution;	Vote related to key stewardship theme (Equality)	Vote related to key stewardship theme (Governance); Shareholder resolution	Vote related to key stewardship theme (Climate); Shareholder proposal

Fund Information		Response		
Fund manager		Aegon		
Name of the fund/strategy		Aegon European ABS Fund		
Number of holdings in the fund/strategy		692		
Fund description		European Asset-Backed Securities (Structured Credit)		
Engagement with portfolio companies				
How many total engagements were initiated (with entities held in the fund/strategy’s portfolio)?				114
How many different entities did you engage with (that were held in the fund/strategy’s portfolio)?				98
What % of entities did you engage with (as a % of total fund/strategy portfolio)?				41%
ESG Engagements				
Please provide the number of engagements by ESG topic:	Topic	Number of engagements	% of total engagements	
	Environmental	4	3%	
	Social	2	2%	
	Governance	29	25%	
	Other	79	70%	
	Total	114	100%	
If you answered “Other”, please describe.		Other = General disclosure (where Aegon are seeking additional information from the relevant transaction parties on practices or products to make their own proprietary ESG assessment of a certain issuer).		
Engagement process				
Please describe your engagement process.		Before investing in an ABS transaction, Aegon’s investment team actively engages with relevant transaction parties. Relevant transaction parties may be the seller, sponsor, originator, investment manager, etc. Generally speaking, Aegon’s engagement focus is on seeking positive change / impact with individual parties (with a view to influencing the wider market as a whole). Aegon tracks its engagements as follows: Milestone 1: Aegon starts a dialogue with the relevant transaction parties, including an ESG sector-specific questionnaire. Milestone 2: Aegon receives responses on its questions and assesses the responses. Milestone 3: If needed, it engages in further dialogue on specific concerns. Milestone 4: The relevant transaction party addresses the concerns and takes relevant actions. No further action required if Aegon obtains satisfactory responses from the transaction parties. At this point, the engagement is concluded.		

Engagement Case Study	
Fund manager	Aegon
Name of fund/strategy	Aegon European ABS Fund
Name of entity you engaged with	LGT Group
Date of engagement	Q3 2025
Theme / topic of the engagement	Engagement on Social factors with New CLO Manager
Please describe your engagement process for this case study.	In 2025, LGT (a newly-established Collateralised Loan Obligation [CLO] manager based in Switzerland) entered the market. Aegon's ABS investment team initiated the engagement by scheduling a call to discuss their ESG approach and requested the completion of Aegon's CLO ESG questionnaire. Key social factors under consideration included: • Whether the firm is a signatory to the United Nations Principles for Responsible Investment (UN PRI) or similar responsible investment initiatives. • Scope of its Diversity & Inclusion policies • Commitment to paying living wages.
Please comment on the outcomes from this case study.	In Q3 2025, when LGT's first CLO went to market, it had not sufficiently addressed Aegon's ESG-related inquiries. Consequently, Aegon chose not to participate in the inaugural CLO transaction. Given their early stage, Aegon recognise the need for time to establish a robust ESG framework. Aegon's approach remains constructive and pragmatic: they will aim to re-engage ahead of the CLO manager's next issuance to assess progress and support alignment with their ESG standards.

Fund Information		Response		
Fund Manager	Coolabah			
Name of the fund/strategy	Pacific Coolabah Global Active Credit Fund			
Number of holdings in the fund/strategy	58			
Fund description	Actively-managed Global Investment Grade Bonds			
Engagement with portfolio companies				
How many total engagements were initiated (with entities held in the fund/strategy’s portfolio)?				141
How many different entities did you engage with (that were held in the fund/strategy’s portfolio)?				42
What % of entities did you engage with (as a % of total fund/strategy portfolio)?				72%
ESG Engagements				
Please provide the number of engagements by ESG topic:	Topic	Number of engagements	% of total engagements	
	Environmental	20	14%	
	Social	0	0%	
	Governance	0	0%	
	Other	121	86%	
	Total	141	100%	
If you answered “Other”, please describe	“Other” refers to engagements with issuers on financial topics, which can be on ESG topics specific to issuers, such as recent controversies or ESG ratings.			
Engagement process				
Please describe your engagement process. (250 words max.)		Engagement candidates are identified through Coolabah’s Credit Research Team’s ESG analysis, which surfaces issuer-specific questions, ESG-related deficiencies, or material risks. Engagements are conducted by Coolabah’s ESG analyst and/or credit analysts, who engage directly with issuers’ investor relations representatives, ESG specialists, or relevant department heads. Priority topics are predominantly determined on an individual issuer basis, driven by issues arising in our ESG analysis. Several material topics are engaged on across the majority of investees, including: (i) labelled bond issuance, covering how issuers build their eligible green/social asset base; (ii) climate risk, particularly transition risk, including issuer progress against greenhouse gas targets and sustainable lending activities; and (iii) ESG ratings, including which agencies issuers track or target and the importance placed on component pillar scores (for example, MSCI’s E, S, and G pillars).		

Engagement Case Study	
Fund manager	Coolabah
Name of fund/strategy	Pacific Coolabah Global Active Credit Fund
Name of entity you engaged with	Bank of Montreal
Date of engagement	Q1 2026
Theme / topic of the engagement	Climate strategy
Please describe your engagement process for this case study.	Coolabah identified Bank of Montreal (BMO) for engagement to gain a deeper understanding of its climate strategy. BMO was one of the first Canadian banks to withdraw from the Net Zero Banking Alliance (NZBA) in 2025, raising questions about the durability of its climate commitments. The engagement was conducted by Coolabah's ESG and credit analysts, who engaged directly with BMO's investor relations and ESG specialists. Discussion centred on BMO's climate strategy post-NZBA, including its retention of NZBA-aligned financed-emissions targets for high-emitting segments (oil and gas, power generation, agriculture, commercial and residential real estate); its sustainable finance product suite, including 'BMO Retrofits' financing (lower cost of capital plus decarbonisation expertise for real estate energy-efficiency-enhancing retrofits), and sustainability-linked loans for agricultural customers tied to KPI-based decarbonisation commitments; and 'BMO Radicle', the bank's carbon credit and trading platform).
Please comment on the outcomes from this case study.	The engagement materially deepened Coolabah's understanding of BMO's post-NZBA climate strategy, and the insights gained were incorporated into the ESG section of BMO's Credit Report. The engagement demonstrated that BMO's climate strategy remains business-driven and embedded in its product suite (BMO Retrofits, sustainability-linked agricultural lending, BMO Radicle) and that financed-emissions targets remain aligned with the NZBA framework despite the bank's formal withdrawal. This supported Coolabah's decision to retain investment approval for BMO's bonds. The engagement is considered formally completed for this reporting period, with findings documented in Coolabah's Credit Report. However, BMO remains an active engagement candidate on an ongoing basis given the materiality of its climate exposures.

Fund Information		Response		
Fund manager	Fermat			
Name of the fund/strategy	Fermat UCITS Cat Bond Fund			
Number of holdings in the fund/strategy	350			
Fund description	Insurance-linked Securities (transfer of insurance event risk)			
Engagement with portfolio companies				
How many total engagements were initiated (with entities held in the fund/strategy’s portfolio)?				66
How many different entities did you engage with (that were held in the fund/strategy’s portfolio)?				23
What % of entities did you engage with (as a % of total fund/strategy portfolio)?				35%
ESG Engagements				
Please provide the number of engagements by ESG topic:	Topic	Number of engagements	% of total engagements	
	Environmental	23	100%	
	Social	23	100%	
	Governance	23	100%	
	Other	-	-	
	Total	23	100%	
If you answered “Other”, please describe				
Engagement process				
Please describe your engagement process.		When engaging on ESG issues, Fermat’s focuses on two main themes: 1) Strengthen the market. Fermat regularly engages with Insurance-linked Securities (ILS) sponsors to raise material ESG-related questions regarding a particular sponsor/issuance. Such dialogue is also an opportunity to continue longer-term thematic sustainability dialogues with sponsors aimed at gradually improving transparency and ESG risk transfer disclosure standards in the asset class. 2) To broaden the roles and applications of ILS. This has a particular focus on the potential public policy applications of ILS, especially addressing disaster/protection gap issues. Fermat also engages with other market actors such as model vendors, trustees, broker-dealers, and legislators and policymakers. Identification of candidates is not about selective engagement. It is a routine part of the underwriting process with <i>all</i> counterparties across the cycle. Tracking effectiveness is not driven by KPIs but is rather driven by continuous engagement with counterparties.		

Engagement Case Study	
Fund manager	Fermat
Name of fund/strategy	Fermat UCITS Cat Bond Fund
Name of entity you engaged with	International Monetary Fund (IMF)
Date of engagement	Q4 2025
Theme / topic of the engagement	Sovereign Use of Insurance-linked Securities
Please describe your engagement process for this case study.	Fermat engaged with the International Monetary Fund (IMF) following the aftermath of Hurricane Melissa, with a focus on the role of Insurance-linked Securities (ILS) for sovereign governments in protecting against the economic impacts of natural disaster risk. Hurricane Melissa was strongest tropical cyclone in Jamaican history when it made landfall in October 2025 as a Category 5 storm (highest possible danger level), with sustained winds of 185mph. The cost of the physical damage from the storm alone was estimated to be USD 8.8 billion—equivalent to 40% of the country's GDP. Hurricane Melissa triggered a 100% payout from the parametric IBRD CAR 136 Sustainable Development Bond 2024 Jamaica notes (which was held in the fund's portfolio), sponsored by the World Bank on behalf of the Government of Jamaica in 2024, with Jamaica receiving the full USD 150m payout from the notes in December 2025. In total, the Jamaican government benefited from USD 650m from various contingent disaster financing strategies put in place, including ILS. Fermat has long been a supporter of the World Bank's Capital-At-Risk (CAR) notes programme. In the aftermath of Hurricane Melissa, the IMF contacted Fermat to invite it to present on ILS to senior executives at the IMF.
Please comment on the outcomes from this case study.	Fermat's Dr Joanna Syroka travelled to Washington DC to deliver a presentation on ILS to the IMF in December 2025. The audience included over 30 senior IMF staff. The presentation, which included a recommendation that the IMF consider adding ILS into the IMF financial assistance policies for sovereign governments, was well received and led to a constructive discussion. While this is the only the start of Fermat's engagement with the IMF, this meeting builds on the long-standing relationship that Fermat with the World Bank on ILS. Fermat does not expect immediate results from such engagements; rather, it hopes that collaborating with leading ILS investment manager (like Fermat) will give multilateral organisations like the IMF confidence to consider tools such as ILS when it considers the risks that natural disasters pose to the economic development of countries.

Fund Information		Response		
Fund manager	Fund-of-funds, with Van Lanschot Kempen (VLK) as fund selector			
Name of the fund/strategy	Kempen European Direct Lending Solution (EDLS)			
Number of holdings in the fund/strategy	7 underlying funds			
Fund description	Private Credit (fund-of-funds)			
Engagement with portfolio companies				
How many total engagements were initiated (with entities held in the fund/strategy’s portfolio)?				1
How many different entities did you engage with (that were held in the fund/strategy’s portfolio)?				1
What % of entities did you engage with (as a % of total fund/strategy portfolio)?				27%
ESG Engagements				
Please provide the number of engagements by ESG topic:	Topic	Number of engagements	% of total engagements	
	Environmental	1	50%	
	Social	1	50%	
	Governance	-	-	
	Other	-	-	
	Total	2	100%	
If you answered “Other”, please describe		One notable engagement on ESG data availability and transparency of an underlying fund manager, covering both E and S data.		
Engagement process				
Please describe your engagement process.		Van Lanschot Kempen’s (VLK) engagement with external fund managers is executed by the Manager Research teams (including for EDLS). The focus of this engagement approach is on the fund managers’ responsible investment policy, implementation and disclosure, but also covers issues like climate action and labour conditions in the value chain. The aim of engagement is to encourage best practices and encourage fund managers to engage in their own dialogue with portfolio companies. In particular, for EDLS, engagement focus is often on enhancing ESG reporting and transparency. In 2021, VLK shared with the underlying fund managers a template covering the ESG data metrics that they wanted the underlying fund managers to report on (e.g. carbon emissions, sustainability-based margin ratchets, Sustainable Development Goal [SDG] contribution, and other ESG metrics). EDLS in turn now reports on these metrics annually to track the progress of the fund managers.		

Engagement Case Study	
Fund manager	Fund-of-funds, with Van Lanschot Kempen (VLK) as fund selector
Name of fund/strategy	Kempen European Direct Lending Solution (EDLS)
Name of entity you engaged with	Barings
Date of engagement	Q1 2026
Theme / topic of the engagement	Sustainability management and measurement
Please describe your engagement process for this case study.	Van Lanschot Kempen (VLK) have engaged with Barings (underlying fund manager) since 2024 on their ability to assess and report on the sustainability profiles of their loan deals (especially the provision of ESG data); VLK has generally been pleased with the receptiveness of Barings to engage in constructive dialogue on these issues. Conversations have been ongoing with their client service, investment, and sustainability teams who have all shown willingness to improve in this area. For example, VLK have worked with Barings in selecting an external party to assist with this sustainability analysis, including involvement in the screening process and attending interviews with candidates; Barings even sought VLK's approval before proceeding with their preferred candidate.
Please comment on the outcomes from this case study.	As mentioned above, VLK was heavily involved in Barings' selection of a third-party to conduct sustainability assessments on Barings' portfolio. In 2026, VLK continued to work with Barings on this topic. The external party will now provide reporting/data directly to EDLS; VLK deem this reporting to be of high quality and believes this adds considerable value for clients. VLK have scheduled meetings later in 2026 with the external party to discuss their work and expectations, in conjunction with Barings.

5. DC Section

Introduction

Until 4th September 2025, the Trustee had overall responsibility for how the Plan's investments in the DC Section are governed and managed in accordance with the Plan's Trust Deed and Rules, as well as Trust Law, Pensions law and Pension Regulations. From that date onwards the assets of the DC section were transferred to the Aegon Master Trust and consequently responsibility of the governance of these assets passed to the trustee of the Aegon Master Trust.

The Plan used standard pooled funds offered by Aegon UK and the underlying managers, until the transfer of assets to the Aegon Master Trust on 4th September 2025. The following sections covers the period to 4th September 2025.

Based on the final order of the Competition and Markets Authority (CMA) the Trustee has set a number of objectives for Hymans Robertson, their DC investment consultant, which are monitored annually. These are:

- Optimise value of retirement benefits for members based on level of contributions and DC regulatory and market constraints
- Provide means for members to protect value of members' benefits in the years approaching their selected retirement age against significant market falls (and against their expected retirement patterns) to protect their income in retirement
- Offer a range of investments so that members can select to best match their own personal objectives
- Ensure cost efficient implementation of the Plan's investment strategy and of any changes to investment strategy
- Delivery of the Plan's investment objectives, supported by an effective governance framework
- Comply with relevant pensions regulation, legislation and supporting guidance
- Ensure the funds are meeting their investment objectives
- Implementation of strategic fund changes to be carried out effectively
- Ensure the Platform Provider is appropriate for the Plan

In 2020, the Trustee developed investment beliefs in relation to ESG factors, which they use as a guide when making investment decisions. There have been no changes to these beliefs in the last Plan year. In early 2022, the Trustee surveyed the membership to get views on ESG funds and, as there was real interest, the fund review was brought forward to June 2022. As part of this review, three new ESG funds were added to the self-select fund range which means members have since had access to four ESG funds to choose from on a freestyle basis. In addition, the underlying funds within the Global Equity and Diversified Growth Funds were changed to 100% ESG funds. These two funds are part of the Default Fund on a lifestyle basis during the growth and consolidation phases. These changes came into effect from 1 November 2022. The next review was due to be completed by June 2025. However, the employer decided to close the DC Section for new contributions on 31 March 2025

and a complete transfer of existing DC funds was completed to a Master Trust in September 2025. Therefore, a review was not necessary.

Governance

The Trustee monitors the investment performance of each of the funds on a quarterly basis. This will include a review of the performance of the assets relative to objectives and underlying risks, the economic outlook, and the manner in which the assets are invested. To aid this review, the Trustee will primarily rely on reports and advice received from the Aegon, the individual managers and Hymans Robertson.

The Trustee is satisfied that during the period, up to 4 September 2025:

- The Plan's DC governance structure was appropriate;
- The Trustee has maintained their understanding of investment matters through ongoing training; and
- Their investment advisers met the agreed objectives.

Review of SIP

There were no material changes to the governance arrangements of the Plan to 4th September 2025, nor to the investment policy, nature of risks, or stewardship practices. As a result, the SIP was not amended during this period.

Adherence to the SIP

Until 4th September 2025, the Trustee monitored compliance with the SIP annually. In particular, they obtained confirmation from the underlying managers via Aegon that they have complied with the SIP insofar as is reasonably practicable and that in exercising any discretion they have done so in accordance with Section 4 of the Occupational Pension Plan (Investment) Regulations 2005.

The Trustee is of the opinion that their investment objectives set out in their SIP have been followed during the period ending 4th September 2025. In particular:

An in-depth three-yearly review of the default arrangement and other investment options was completed in June 2022 to ensure they remain suitable for most members. The result of this has been described above. The next in-depth review, due in June 2025, did not take place as the Employer decided to move to a Master Trust during 2025. The objectives and rationale are set out in the SIP for the default arrangement and for the other investment options. The Trustee reviews the performance of all of the funds and reviews any changes in the membership on a quarterly basis. The Trustee is satisfied that (prior to the transfer to the Master Trust) the default arrangement and other investment options remained suitable for most members because:

- There were no material changes to the demographic of the membership;
- The default arrangement continued to perform ahead of target; and
- Members looking to self-select were given a good selection of funds with differing risk and return profiles to choose from.

The following comments relate to the period prior to the transfer to the Master Trust arrangement which took place during 2025.

Expected risk and return

- The Trustee is satisfied that the main investment risks members' face are described in the SIP. The Trustee is satisfied that the expected rates of investment return for the types of funds described in the SIP are reasonable relative to the risks that members face.
- The Trustee believes that the main investment risks members face described in the SIP have not changed materially over the last year.
- The Trustee is satisfied that the current expected rates of investment return for the types of funds described in the SIP are still reasonable relative to the risks that members face.
- The Trustee's views on the expected levels of investment risks and returns inform decisions on the strategic asset allocation (i.e. what types of assets and areas of the world the Plan invests in over the longer-term) for the Plan's Target Date Fund option (which gradually change the funds in which your savings are invested as you approach retirement).
- The Trustee's views on the long-term mix of investments for the Plan's default arrangement did not change during the last year.

Platform provider and fund managers

- The Trustee monitors the service of the platform provider and the funds used by the DC section of the Plan by:
 - Receiving six monthly investment monitoring reports from their investment consultant which reviews performance of the default arrangement and self-select options and reviews the value for money based on the fund charges;
 - Reviewing reports received from Aegon and the individual managers on a quarterly basis and
 - Inviting the Plan's managers to Trustee meetings in order to raise any questions about performance and to hear about any changes to the funds.
- The Trustee is satisfied that the platform provider used by the Plan remains appropriate.

Ability to invest/ disinvest promptly

- It is important that contributions can be invested promptly in the default arrangement or the investment options that have been chosen and that investments can be sold promptly when members want to change where they are invested, transfer their pension pot to another Plan or benefits are due to be paid out when they retire.
- As set out in the SIP, the Trustee is satisfied that money can be invested and taken out of the Plan's funds without delay.
- The Trustee is satisfied that money can be invested in and taken out of the Plan's funds as appropriate as set out in the SIP.

Security of your savings

In addition to the normal investment risks faced investing in the funds used by the Plan, the security of your savings in the Plan depend upon:

- The financial strength of the investment platform provider used by the Plan;
- The financial strength of the fund managers used by the investment platform; and
- The legal structure of the funds the Plan invests in.

The Trustee is not aware of any material changes in the financial strength of the investment platform provider, or the fund managers used by the platform in the last year.

Changes in where funds are invested

- Turnover is one aspect which the Trustee's investment adviser considers when reviewing the ongoing suitability of the funds used by the platform.
- Short-term changes in the level of turnover of the assets in which a fund is invested may be expected when a fund manager alters its investment strategy in response to changing market conditions. However, a change in the level of portfolio turnover might indicate a shift in the amount of risk the fund manager is taking, which could mean that a fund is less likely to meet the objectives for which it was chosen by the Trustee.
- The Trustee has reviewed transaction cost information for the year and is satisfied that based on this information, the level of trading of the funds' assets carried out by the fund managers has been appropriate.

Conflicts of Interest

- As described in the SIP, the Trustee considers potential conflicts of interest:
 - When choosing fund managers;
 - When monitoring the fund managers' investment performance and the fund managers' approaches to investment stewardship and responsible investing; and
 - When the fund manager is making decisions on where each fund is invested.
- The Trustee expects the fund managers to invest the Plan's assets in the members' best interests. As the funds used by the Plan are held at arms-length from the Trustee via a platform, the Trustee liaises with the platform provider to receive reports on its own investment governance of funds including conflicts of interest policy. The Trustee is satisfied that there have been no material conflicts of interest during the year, which might affect members' benefit expectations.

- As described in the SIP, the Trustee seeks transparency of all costs and charges borne by members and when selecting new funds, will consider manager remuneration strategies.

Manager incentives

- As described in the SIP, the Trustee seeks to ensure that the fund managers are suitably incentivised to deliver investment performance in keeping with the funds' objectives.
- The funds used by the Plan are held at arms-length from the Trustee via a platform and the Trustee recognises that no fund the Plan invests in is managed on a performance related basis. Therefore, the Trustee believes that the remuneration structure of managers is appropriate.
- The Trustee is satisfied that the fund managers are suitably incentivised to deliver good outcomes for the Plan's members.

Responsible Investment

- The Trustee believes that responsible investing covers both sustainable investment and effective stewardship of the assets the Plan invests in.
- The Trustee recognises that some members will have strong views on where their pension savings should be invested. The Plan offers members a choice of funds which:
 - Have a sustainable tilt (e.g., the Schroders Sustainable Global Multi Factor Equity Fund);
 - Have different risk profiles; and
 - Give members an ethical option (e.g., four funds available to invest on a freestyle basis)

Nevertheless, the Trustee recognises that it is not possible to cater for everyone's views on non-financial/ethical matters. The Trustee is satisfied that the Plan offers suitable ethical investment options for members in accordance with the SIP.

- The platform provider has not been able to provide portfolio turnover costs to be added to this statement. The Trustee is liaising with them to obtain portfolio turnover for future reports.

6. Voting and engagement – DC Section

The Trustee encourages all their asset managers to be engaged investors and furthermore encourages the managers to report on these activities and to disclose information about Responsible Investing on their website and in their client reports.

As the Plan's investments are held at arms-length from the Trustee and members through a platform operated by Aegon, the Trustee is not able to instruct the fund managers how they should vote on shareholder issues. The Trustee nevertheless:

- Chooses fund managers whose voting policy are consistent with the Plan's objectives;
- Expects fund managers to vote in a way which enhances the value of the funds in which the Plan invests;
- Monitors how the fund managers exercise their voting rights.

How do the Trustees monitor this?

As described in the SIP, the Trustees believed it was important that the Plan's fund managers as shareholders or bond holders took an active role in the supervision of the companies in which they invested, both by voting at shareholder meetings and engaging with the management on major issues which affect a company's financial performance (and in turn the value of the Plan's investments).

As the assets were transferred to the Master Trust during the period covered by this Statement, the Trustees have determined that there is no benefit in collecting and reporting on voting data for the period as responsibility for the stewardship of assets has been passed to the Trustee of the Master Trust.