Avon Rubber Retirement and Death Benefits Plan

Implementation Statement – DB Section (for inclusion in the 2026 Trustee Report & Accounts)

Introduction

This statement sets out how, and the extent to which, the Statement of Investment Principles ('SIP') produced by the Trustee of the Avon Rubber Retirement and Death Benefits Plan ("the Plan") has been followed during the year to 31 March 2026 (the "Plan Year"). This statement has been produced in accordance with The Pension Protection Fund (Pensionable Service) and Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018, the subsequent amendment in The Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019 and the guidance published by the Pensions Regulator.

This statement covers the Defined Benefit ("DB") section of the Plan.

The statement is based on, and should be read in conjunction with, the relevant versions of the SIP that were in place for the Plan Year, which were the SIP dated April 2025 (covering the period between 1 April 2025 and 31 August 2025) and the SIP dated September 2025 (covering the period between 1 September 2025 and 31 March 2026).

Investment Objectives

The Trustee believes it is important to consider the policies in place in the context of the investment objectives they have set. The objectives of the Plan with respect to the DB Section included in the SIP are set out below.

The aim of the Trustee is to invest the assets of the Plan to ensure that the benefits promised to members are provided. In setting the investment strategy, the Trustee first considered the lowest risk asset allocation that could be adopted in relation to the Plan's liabilities. An asset allocation strategy was then selected, designed to achieve a higher return than this lowest risk strategy, which at the same time still represented a prudent approach to meeting the Plan's liabilities.

The objectives were unchanged over the Plan Year.

Review of the SIP

The Trustee reviewed the Plan's SIP in March and October of 2025. Updated SIPs were signed on 1 April and 27 November 2025, reflecting the following key changes:

Date	Changes
April 2025	- Updates to the investment strategy and fund manager structure, including the termination of the Insight Broad Opportunities Fund and Ares Secured Income Fund, as well as the introduction of an allocation to the Aegon European Asset Backed Securities ("ABS") Fund, all of which took place prior to the start of the Plan Year; - The Trustee's stewardship priorities/themes; and - The roles and responsibilities of Trustee and Investment Sub-Committee.
November 2025	- Updates to the investment strategy and fund manager structure, including the termination of BlackRock as the Plan's liability driven investment ("LDI") manager and the appointment of Schroders to manage a Bespoke LDI Fund on the Plan's behalf.

Ruffer's appointment as investment manager to the Plan was terminated in January 2026. Proceeds were transferred to the Schroders LDI portfolio pending completion of the Trustee's review of the Plan's

investment strategy, which was ongoing at the end of the Plan Year. The Trustee intends to update the SIP to reflect the termination of Ruffer and the adoption of the agreed strategy during the year to 31 March 2027.

Assessment of how the policies in the SIP have been followed for the year to 31 March 2026

The Plan's SIP includes the Trustee's policy on Environmental, Social and Governance ('ESG') factors, stewardship and climate change. This policy sets out the Trustee's beliefs on ESG and climate change and the processes followed by the Trustee in relation to voting rights and stewardship.

The Plan's SIP can be found at: https://www.avon-protection-plc.com/pensions/defined-benefit-scheme/.

In order to establish these beliefs and produce this policy, the Trustee undertook investment training provided by their Investment Consultant on responsible investment, which covered ESG factors, stewardship, climate change and ethical investing. The Trustee and Company undertook a review to assist the Trustee with establishing the policy in this area. The Trustee keeps the policy under regular review with the SIP subject to review at least triennially.

The information provided in this section highlights the work undertaken by the Trustee during the Plan Year, and longer term where relevant, and sets out how this work followed the Trustee's policies in the SIP, relating to the Plan as a whole.

	Requirement	Summary of Relevant Policy	In the year to 31 March 2026
1	**Securing compliance with the legal requirements about choosing investments**	*The Trustee obtains advice from its investment advisor, who can provide expert advice enabling the Trustee to choose investment vehicles that can fulfil the Plan's investment objectives. In the Trustee's opinion this is consistent with the requirements of Section 36 of the Pensions Act 1995, the Occupational Pension Schemes (Investment) Regulations 2005 and any subsequent regulation.*	The transfer of the Plan's LDI arrangements from BlackRock to Schroders was implemented in November 2025. The Trustee received written advice from its investment advisor in relation to the suitability of the investment in the Schroders Bespoke LDI Fund prior to investing.
2	**Kinds of investments to be held and balance between different kinds of risks**	*The Trustee regards the choice of asset allocation as the decision which has most influence on the likelihood that it will achieve its investment objectives. In deciding the asset allocation, the Trustee has taken advice from Mercer and made its decisions in consultation with the Company. The Trustee is satisfied that the spread of assets provides adequate diversification of investment for risk purposes.* *The strategic asset allocation is set to achieve the expected return required within an acceptable level of risk.*	The Trustee regards the basic distribution of the assets to be appropriate for the Plan's objectives and liability profile. Over the Plan Year, and based on advice from its investment advisor, the Trustee began to consider how the risk/return efficiency of the current investment strategy could be improved. The Trustee has also set a low dependency investment allocation ("LDIA") in accordance with the requirements of the DB Funding Code. Further discussions in relation to the current investment strategy and how this is expected to evolve towards the LDIA over time are anticipated over the year to 31 March 2027.

	Requirement	Summary of Relevant Policy	In the year to 31 March 2026
3	**Risks, including the ways in which risks are to be measured and managed**	*The Trustee recognises risk (including investment, operational and funding) from a number of perspectives in relation to the DB section of the Plan.* *Should there be a material change in the Plan's circumstances, the Trustee will review whether and to what extent the investment arrangements should be altered, in particular whether the current risk profile remains appropriate.*	As detailed under the "Risk Measurement and Management" section of the SIP, the Trustee considers risks in a qualitative manner when deciding investment policies, strategic asset allocation, and the choice of fund managers / funds / assets classes. The Trustee monitored the Plan's risk exposures during its quarterly meetings, through reporting provided by its advisors.
4	**Expected return on investments**	*The Plan's investment strategy has been structured so that the investments aim to generate a level of return required to meet the overall objectives. In the case of active managers, a target has been agreed to exceed the relevant benchmark by a specific amount.*	The investment performance report has been reviewed by the Trustee on a quarterly basis. The investment performance report includes how each investment manager is delivering against their specific mandates. The Trustee may invite managers to present to the Trustee if there are any performance concerns or if there are any changes to the team responsible for managing the assets. Over the Plan Year, the Plan has returned 3.6% relative to a benchmark return of 5.6%, net of fees. The Trustee has given particular consideration to the continued underperformance of the mandate managed by Europa over the year, noting that this has been driven by the underperformance of one of the underlying assets. The Trustee terminated Ruffer's appointment as investment manager to the Plan in January 2026. This was partly driven by the strategy's lacklustre performance, amongst other things.
5	**Realisation of investments**	*The Trustee's administrators will realise assets following member requests on retirement or earlier where required.* *The Trustee considers the liquidity of the investments in the context of the likely needs of members.*	The Plan's assets are mostly pooled investment vehicles that offer daily to quarterly liquidity. The assets held in the Real Estate Debt portfolio managed by Europa are illiquid.
6	**Financially material considerations over the appropriate time horizon of the investments, including how those considerations are taken into account in the selection, retention and**	*The Trustee believes that environmental, social and governance ("ESG") factors may have a material impact on investment risk and return outcomes.* *The Plan's investment managers are expected to evaluate these factors, including climate change considerations, and exercise voting rights and stewardship obligations attached to the investments in line with their own corporate governance policies and current best practice, including the UK Corporate*	The investment performance report was reviewed by the Trustee on a quarterly basis. This incorporates a summary of the ratings and indicators (both general and ESG-specific) assigned to the appointed investment managers by the investment advisor, as well as information on how each investment manager is delivering against their specific mandates. The SIP includes the Trustee's policy on ESG factors, stewardship and climate change. This policy sets out the Trustee's beliefs on ESG matters (including climate change) and the processes followed by the Trustee in relation to voting rights and stewardship.

	Requirement	Summary of Relevant Policy	In the year to 31 March 2026
	realisation of investments	*Governance Code and UK Stewardship Code* *The Trustee considers how ESG, Climate change and Stewardship is integrated within investment process in appointing new investment managers and monitoring existing investment managers.*	The Trustee has not set any investment restrictions on the appointed investment managers in relation to particular products or activities but may consider this in future. However, the Trustee has agreed that for future investment manager selections, a robust approach to incorporating ESG considerations into the investment decision making process will be a pre-requisite where ESG considerations are considered to have a material impact on investment performance.
7	**The extent (if at all) to which non-financial matters are taken into account in the selection, retention and realisation of investments**	*Member views on non-financially material issues are not currently explicitly taken into account in the selection, retention and realisation of investments.*	Whilst members' views on non-financial issues are not currently explicitly considered, the Trustee will continue to review its position on this policy.
8	**The exercise of the rights (including voting rights) attaching to the investments**	*Investment managers are expected to evaluate these factors, including climate change considerations, and exercise voting rights and stewardship obligations attached to the investments in line with their own corporate governance policies and current best practice.*	The Trustee has delegated its voting rights to the investment managers. As a result, the Trustee does not use the direct services of a proxy voter, although the investment managers may employ the services of proxy voters in exercising their voting rights on behalf of the Trustee. Investment managers are expected to provide voting summary reporting on a regular basis (at least annually). The voting policies of the funds that can invest in equities have been considered by the Trustee and the Trustee has determined them to be consistent with their investment beliefs. Over the prior 12 months, the Trustee has not actively challenged the managers on their voting activities, however it may do so in future where it feels this is appropriate. Information on the significant votes undertaken by Ruffer over the Plan Year has been provided in the voting activity section below.
9	**Undertaking engagement activities in respect of the investments (including the methods by which, and the circumstances under which, the Trustee would monitor and engage with relevant persons**	*Investment managers are expected to evaluate these factors, including climate change considerations, and exercise voting rights and stewardship obligations attached to the investments in line with their own corporate governance policies and current best practice.* *Outside of those exercised by investment managers on behalf of the Trustee, no other engagement activities are undertaken.*	The Trustee requested that the investment managers confirm compliance with the principles of the UK Stewardship Code. CQS, JP Morgan, Aegon and Schroders have confirmed that they are signatories of the current UK Stewardship Code. The group of signatory investment managers corresponds to the majority of the Plan's investment managers (c.93% of total assets as at 31 March 2026). Europa has chosen not to become signatories of the 2020 UK Stewardship Code at this stage, as they provide investment and asset management on behalf of global clients and invest in assets both in the UK and overseas. Europa actively seeks to

	Requirement	Summary of Relevant Policy	In the year to 31 March 2026
	about relevant matters)		support the UK Stewardship Code principles of responsible allocation, management and oversight of capital to create long-term value for clients and will continue to review the Code's applicability and eligibility. The Trustee has received details of relevant engagement activity by each of the Plan's investment managers over the year, including examples of instances where they have engaged with companies they were invested in/about to invest in that resulted in a positive outcome. These engagement initiatives, which related to various ESG issues, were driven mainly through regular engagement meetings with the companies in which the managers invest, or by voting on resolutions at companies' Annual General Meetings ("AGMs"). More information around each of the Plan's investment managers engagement activities can be found under the "Engagement" section below.
10	**How the arrangement with the asset managers incentivise the asset managers to align their investment strategies and decisions with the Trustee's policies in the SIP**	*In line with the SIP, managers are chosen based on their capabilities and, therefore, their perceived likelihood of achieving the expected return and risk characteristics required for the asset class being selected.* *As the Trustee invests in pooled investment vehicles it accepts that there is no ability to specify the risk profile and return targets of the manager, but appropriate mandates can be selected to align with the overall investment strategy.*	Over the year under review, BlackRock's appointment as the Plan's LDI manager was terminated, with the Plan investing in a Bespoke LDI Fund managed by Schroders. This followed the BlackRock's announcement that it was closing the pooled liability matching funds in which the Plan previously invested. The Trustee also reviewed Ruffer's role within the portfolio over the course of the year. This led to the termination of Ruffer's appointment as investment manager to the Plan in January 2026. Proceeds were transferred to the Schroders LDI portfolio pending completion of the Trustee's review of the Plan's investment strategy, which was ongoing at the end of the Plan Year. The Trustee has continued to review the appropriateness of the funds in which the Plan invests to ensure that they remain aligned with the investment strategy being targeted.
11	**How the arrangement incentivises the asset managers to make decisions based on assessments about medium to long-term financial and non-financial performance of an issuer of debt or equity and to engage with**	*The Trustee meets the Plan's investment managers from time to time to review their actions together with the reasons for and background behind the investment performance. The Investment Consultant supports the Trustee in fulfilling its responsibility for monitoring the investment manager.* *Managers are aware that their continued appointment is based on their success in delivering the mandate for which they have been appointed to manage. If the Trustee*	Over the year under review, the Trustee was happy that the contractual arrangements in place continued to incentivise the managers to make decisions based on medium to long-term financial and non-financial performance.

	Requirement	Summary of Relevant Policy	In the year to 31 March 2026
	issuers of debt or equity in order to improve their performance in the medium to long-term	*is dissatisfied, then they will look to replace the manager.*	
12	**How the method (and time horizon) of the evaluation of asset managers' performance and the remuneration for asset management services are in line with the Trustee's policies mentioned in the SIP**	*The Trustee is a long-term investor and is not looking to change investment arrangements on a frequent basis.* *Managers' performance is reviewed over both short and long-time horizons.* *Remuneration is agreed upon prior to manager appointment, based on assets under management and is reviewed on a regular basis.*	The Trustee has received investment performance reports on a quarterly basis. The reports presented performance information and commentary in respect of the Plan's investments over a range of time periods. The Trustee has reviewed the absolute performance, relative performance against a suitable index used as the benchmark, and/or against the manager's stated target performance on a net of fees basis. The Trustee's focus is on long-term performance, but it will engage with investment managers if there are short-term performance concerns. The Plan's appointed investment managers are compensated via a fee based on the total assets under management, which incentivises long-term capital growth.
13	**How the Trustee monitor portfolio turnover costs incurred by the asset managers and how they define and monitor targeted portfolio turnover or turnover range**	*The Trustee does not explicitly monitor portfolio turnover costs. However, the Trustee will continue to monitor industry improvements concerning the reporting of portfolio turnover costs.*	Investment manager performance was reported and evaluated net of all fees and costs (including those incurred because of buying and/or selling underlying assets). In addition, where possible, performance objectives for investment managers have been set on a net basis. In this way, the investment managers were incentivised to keep portfolio turnover costs to the minimum required to meet or exceed their objectives. Portfolio turnover costs are also considered by Mercer as part of their manager research process. The Mercer ratings assigned to the Plan's investment managers as part of this process have been reviewed by the Trustee on a quarterly basis.
14	**The duration of the arrangement with the asset managers**	*There is no set duration for the manager appointment. However, appointments are regularly reviewed as to the continued suitability and could be terminated either because the Trustee is dissatisfied with the managers' ongoing ability to deliver the mandate promised or because of a change of investment strategy by the Trustee.*	During the Plan Year, the Trustee invested in the Schroders Bespoke LDI Fund and terminated the LDI mandate with BlackRock. The Trustee also terminated the appointment of Ruffer as investment manager to the Plan in January 2026. There were no other changes to the appointed asset managers.

Assessment of voting, stewardship and engagement activity for the year to 31 March 2026

The following section summarises the information reported by the Plan's investment managers to the Trustee in respect of voting, stewardship and engagement activities during the Plan Year. Engagement activity is provided at a firm-wide level, whilst voting activity is for the specific mandates in which the Plan was invested over the Plan Year.

Engagement

We have summarised the engagement policies and activities undertaken by the investment managers in which the Plan was invested as at 31 March 2026. This does not include BlackRock or Ruffer, whose appointment as investment manager to the Plan was terminated over the Plan Year.

Aegon

- Stewardship forms an integral part of Aegon's responsible investment approach and is governed through its Active Ownership Policy and broader Responsible Investment Framework.

- Aegon has provided examples of engagement activity relevant to the strategy in which the Plan invests. These included engagement with various residential mortgage-backed securities ("RMBS") and consumer ABS issuers to improve the availability of ESG-related loan-level data, such as Energy Performance Certificate data for mortgage collateral and emissions data for auto loans. Aegon confirmed that data availability across European RMBS and ABS originators has improved over time, although coverage remains uneven across markets.

- Aegon also engaged with a newly established Swiss collateralised loan obligation ("CLO") manager on ESG and social factors, including responsible investment commitments, diversity and inclusion policies and living wage practices. Following direct dialogue and follow-up correspondence, Aegon concluded that the manager had not sufficiently addressed its ESG-related inquiries by the time of the manager's inaugural CLO issuance and therefore chose not to participate in that transaction. Aegon intends to re-engage ahead of any future issuance to assess progress.

- In engagements with ABS originators, Aegon has expressed a preference for financing products that support improved environmental or social outcomes, such as mortgages for energy-efficient properties or loans linked to environmental improvements. Aegon reported that the number of originators offering such products has grown over the last year.

- Aegon confirmed that it did not conduct engagement activity for the Fund that differed from its firm-wide engagement policy during the year to 31 March 2026. Furthermore, it did not undertake divestments due to stewardship activities carried out during the year.

- Environmental and social risks are integrated into Aegon's investment process through its proprietary ABS ESG framework. Prior to investment, the ABS team assesses ESG risks relating to the underlying collateral, the originator and servicing practices, and the country and regulatory environment associated with the collateral. This includes analysis of lending practices, data privacy, customer treatment, energy efficiency characteristics of underlying assets where relevant, regulatory standards and broader sustainability risks. Aegon also uses sector-specific ESG questionnaires in its due diligence, noting that transactions assessed as having poor ESG characteristics are not eligible for investment under the strategy's ESG framework.

- Aegon consider climate change to be a financially material risk and opportunity, which is managed through its Climate Action Plan and Responsible Investment Framework. Climate considerations are embedded across investment processes through ESG integration, climate research, risk management, stewardship and reporting. To the best of Aegon's knowledge, there were no engagement activities or investment decisions during the reporting period that were inconsistent with its climate-related policies, Climate Action Plan or broader Responsible Investment Framework.

Schroders

Schroders manages a Bespoke LDI Fund on the Plan's behalf, which predominantly invests in UK government bonds and over liability hedging instruments. Engagement activity is therefore less relevant to the mandate the Trustee has appointed Schroders to manage. The information below relates to Schroders' broader engagement activity over the Plan Year.

- Schroders describes active ownership as a two-way dialogue with investee companies, focused on financially material sustainability and governance issues, with clear objectives and a structured "milestone" approach to monitor progress and measure impact.

- In 2025, Schroders carried out 950+ engagements with 580+ companies (956 total public markets engagements), split between investment desk-led (441), Sustainable Investment team-led (449) and collaborative (66) engagements. The highest proportion of engagements related to climate change, followed by corporate governance.

- Schroders conducted 550 climate-related engagements with 381 companies in 2025, mainly in higher carbon-exposed sectors (including basic materials, utilities, energy, industrials and financials). These engagements were primarily one-to-one, supplemented by 33 collaborative climate engagements.

- In 2025, 50% of its climate-related engagements focused on climate mitigation, 16% on climate oversight, and 14% on climate adaptation, reflecting an emphasis on both transition planning and resilience.

- Schroders prioritises engagement over divestment in public markets and uses a defined Climate Engagement and Escalation framework (including escalation tools such as voting and AGM participation) to drive change where companies are unresponsive or lagging on material climate risk management.

- Schroders also undertakes engagement through major investor collaborations, including being a founding signatory to Climate Action 100+ ("CA100+"). The firm led two CA100+ company engagements in 2025 and supported other collaborative engagements (alongside other climate collaboration groups).

CQS

- During the year to 31 March 2026, engagement activity in respect of the Fund did not differ from CQS's firm-wide engagement policy.

- Engagement case studies relevant to the period are included in CQS's Q1 2026 Investment Consultants Sustainability Working Group reporting, including examples across the shipping, food retail, semiconductor and aviation sectors, with further examples expected in its forthcoming stewardship report covering 2025 activity.

- CQS does not calculate or disclose the impact on transaction costs arising from engagement, ESG due diligence or other stewardship activities.

- CQS manages ESG-related risks and opportunities across portfolios primarily through research, stewardship activities, investment decisions and risk monitoring. As a credit investor, CQS uses a range of data tools to manage ESG risks, including climate scenario analysis, carbon footprint analysis, emissions reduction targets and forward-looking Implied Temperature Rise analysis.

- CQS's investment process integrates ESG factor assessment through a sector-focused research process, including modelling and internal ratings, with ESG methodologies applied across both public and private debt. Research analysts undertake bottom-up fundamental research on individual issuers using external research, third-party data providers, company reporting and information gathered through engagement. These considerations are incorporated into risk, return and outlook assessments and actively influence investment decisions and portfolio positioning.

- CQS considers climate change to be a credit risk over all time horizons. It uses a range of methods to assess both physical and transition climate risks across portfolios and monitors significant contributors to climate risk and ESG laggards through its portfolio management and research processes. CQS seeks to address climate-related investment risks by integrating climate risk into its risk framework, incorporating material ESG factors into investment decision-making, and using engagement to highlight environmental risks and influence company behaviour.

- CQS confirmed that no engagement or investment activity in the Fund during the period contradicted its policy on climate-related risk.

Europa

- Europa's real estate debt investments are supported by a structured rhythm of quarterly engagements with borrowers, anchored in performance and financial reporting. In addition to these formal touchpoints, ongoing dialogue is used to monitor progress against key milestones and strategic initiatives, supporting the delivery of appropriate financial outcomes for the Fund.

- Europa noted that the Fund's obtains exposure to a loan investment in an open retail scheme where all new leases incorporate green lease provisions and all Energy Performance Certificates ("EPCs") meet the latest Minimum Energy Efficiency Standards. Europa also reported that the onsite management team supports a range of local charities and foundations, demonstrating a broader approach to community stewardship.

- Europa confirmed that engagement activity in respect of the Fund over the year to 31 March 2026 was consistent with its firm-wide engagement policy.

- Europa does not separately quantify transaction costs attributable to stewardship, ESG due diligence or engagement activity. These activities form part of the Fund's standard investment and asset management processes and are not expected to have resulted in a material increase in transaction costs over the period. In addition, for individual loan investments, ESG due diligence costs are met by borrowers.

- In relation to environmental and social risk management, Europa has engaged environmental consultant Evora to develop an ESG questionnaire, which all borrowers are required to complete. This is used both to assess ESG credentials at the outset and to monitor improvements in the underlying assets and borrowers' wider ESG approach over time. in addition, due diligence and ongoing monitoring of loan investments includes review of key environmental and social risks, supported by third-party environmental reports, building condition reports (where appropriate), and an annual review of EPC ratings as part of the valuation process.

- Climate-related risks are identified and managed through Europa's existing ESG and investment processes. Climate risks, including physical climate risks, are assessed at acquisition through the Building Sustainability Assessment Toolkit due diligence process and are considered as part of investment decision-making. Actions identified through due diligence are then progressed through asset-level sustainability objectives and ongoing asset management. Europa has a net zero carbon policy addressing its long-term emissions reduction goals.

- Europa confirmed that no engagement or investment activity in the Fund contradicted its policy on climate-related risk during the year.

JP Morgan

- JP Morgan recognise that financially material ESG issues can affect the risk-adjusted long-term performance of the companies and assets in which it invests. ESG risks and opportunities are considered both during acquisition and throughout the life of an investment through active asset management and the Fund's ESG in Action framework.

- During the year, JP Morgan provided examples of engagement activity and outcomes within the portfolio, including:

    - GETEC / Park Stein: Following the resumption of operations at the Life Science Park Rhine Valley site in Stein, GETEC implemented a range of energy efficiency and sustainability initiatives, including rooftop photovoltaic installations expected to produce c.2,100 MWh of electricity per year, use of renewable heat sources and a flexible heat pump system. JP Morgan reported that these measures contributed to operating efficiencies, improved tenant appeal and progress toward climate-neutral objectives.

    - IIF portfolio – Scope 3 measurement: The Fund completed a third-party Scope 3 proxy exercise and also undertook Scope 3 pilot work with selected portfolio companies to improve understanding of materiality, methodology and measurement, with a view to aligning future reporting with investor requirements.

    - North Queensland Airports: Engagement supported continued progress on renewable energy and decarbonisation initiatives, including transition of fleet vehicles to electric and hybrid models, development of charging infrastructure, LED lighting upgrades, smart electricity and water metering, and support for Sustainable Aviation Fuel initiatives. JP Morgan noted that Mackay Airport achieved carbon-neutral status for Scope 1 and 2 emissions in 2025, with 100% renewable electricity supplied to the airport and its tenants through CleanCo Queensland.

- Engagement activity for the Fund was aligned with the JP Morgan's firm-wide engagement policy during the year and there was no material impact due to transaction costs arising from stewardship or ESG-related activity. Furthermore, no engagement or investment activity in the Fund contradicted JP Morgan's policy on climate risk.

Voting activity

The Department for Work and Pension released a set of Implementation Statement requirements on 17 June 2022, "Reporting on Stewardship and Other Topics through the Statement of Investment Principles and the Implementation Statement: Statutory and Non-Statutory Guidance" to be adopted in all Implementation Statements for schemes with years on or after 1 October 2022. The most material change was that the Statutory Guidance provided an update on what constitutes a "significant vote":

- A significant vote is defined as one that is linked to the pension scheme's stewardship priorities/themes.
- A vote could also be significant for other reasons, e.g. due to the size of holding.
- Trustees are to include details on why a vote is considered significant and rationale for voting decision.

The Trustee defines a significant vote as one that relates to the Plan's stewardship priorities/themes, which are Climate Change, Pollution & Natural Resource Degradation, Human Rights, and Diversity, Equity and Inclusion, assuming that the vote relates to an underlying holding that represent at least 0.5% of the fund at the date of the vote.

During the Plan Year, no votes were deemed to be significant for the Plan based on the Trustee's definition of a significant vote.

Only one fund in which the Plan was invested over the course of the year included equity holdings that had voting rights, the Ruffer Absolute Return Fund. The Trustee terminated Ruffer's appointment as investment manager to the Plan in January 2026. However, for completeness, a summary of the key voting activity undertaken by Ruffer over the Plan Year is provided below (noting that the Plan was not invested in the strategy over the entire period).

Ruffer

Ruffer appoints Institutional Shareholder Services ("ISS") as its proxy voting advisor. Ruffer has developed its own internal voting guidelines, however it considers issues raised by ISS to assist in the assessment of resolutions and the identification of contentious issues. Although Ruffer is cognisant of ISS's voting recommendations, it does not delegate or outsource its stewardship activities when deciding how to vote on clients' shares.

Key votes undertaken over the Plan Year are summarised below:

- There were 176 meetings, 2,546 resolutions for which Ruffer were eligible to vote, and Ruffer voted on 99.1% of these.
- Ruffer voted with management on 96.7% of the resolutions, against management on 2.4% and abstained on 0.3%.