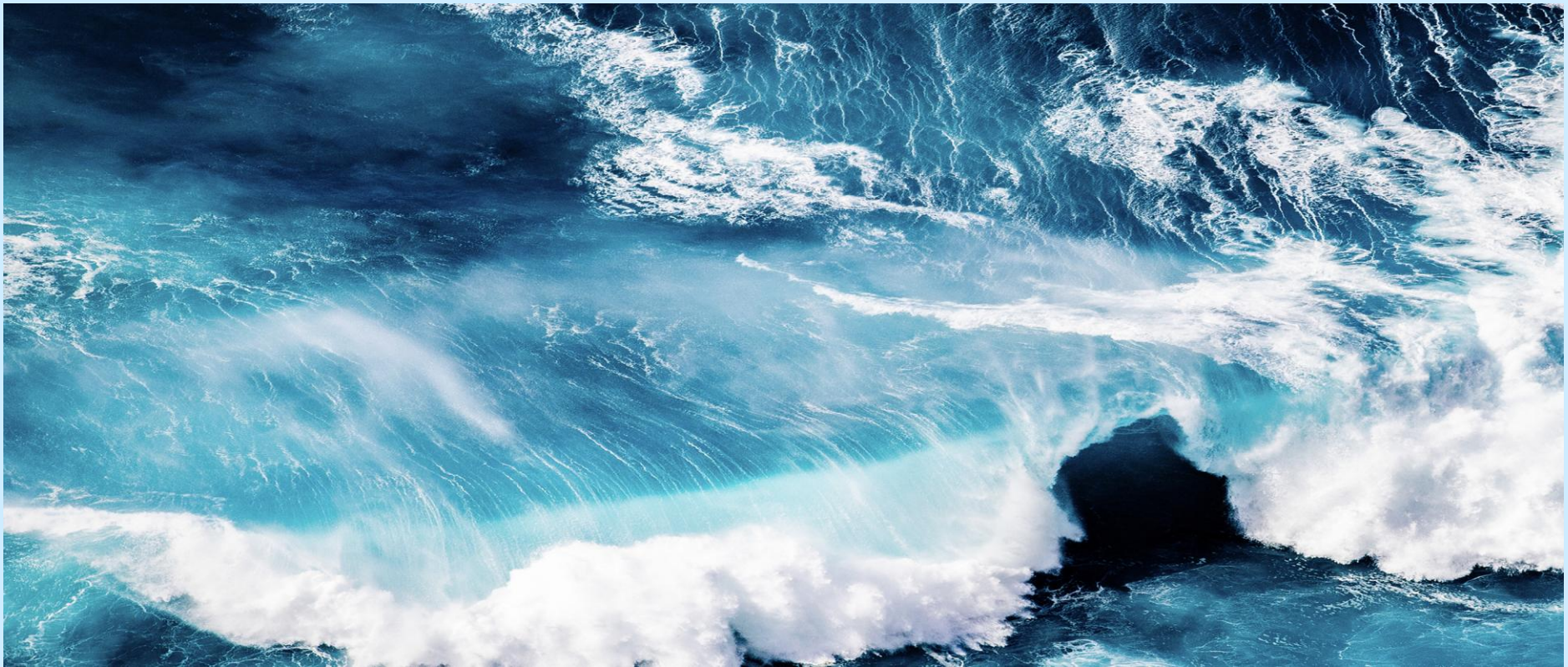


Princes Pension Scheme (the ‘Scheme’)

SIP Implementation Statement for the Year Ended 31 March 2026



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Section 1

Introduction

This Implementation Statement (the “Statement”) sets out the Trustees’ assessment of how, and the extent to which, the Statement of Investment Principles (“SIP”), their engagement policy and their policy with regard to the exercise of rights (including voting rights) attaching to the Scheme’s investments during the one-year period to 31 March 2026 (the “Scheme Year”) have been followed.

The statement is based on, and should be read in conjunction with, the relevant version of the SIP that was in place for the Scheme Year, which was the SIP dated June 2024. A copy of the SIP is available at <https://www.princesgroup.com/princes-pension-scheme>.

This statement has been produced in accordance with the 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 statutory guidance on reporting on stewardship in the implementation statement dated 17 June 2022.

During Q1 2024, the Trustees undertook a “buy-in” by using the majority of the Scheme’s assets to purchase a bulk annuity insurance policy with Aviva Life & Pensions UK Limited (Aviva), a UK insurance company authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority. Under this policy Aviva undertake, via the Scheme, to pay the Scheme’s benefit obligations as they fall due. The Trustees purchased the policy with Aviva having considered appropriate advice from their advisors.

As a result of this transaction, Mercer Limited (“Mercer”) no longer has discretion over the Scheme assets. However, the Trustees retained the appointment of Mercer as the investment manager of the Scheme’s residual assets that are invested in a range of specialised pooled funds (known as the Mercer Funds). The management of each of the Mercer Fund’s assets is carried out by Mercer affiliates, namely Mercer Global Investments Europe Limited (MGIE) and Mercer Risk Management Limited (MRML). Specifically, the Trustees invest in a combination of cash and gilt funds with Mercer. The Trustees have implicitly delegated consideration of ESG issues, engagement and stewardship obligations to Aviva in relation to the majority of the Scheme’s DB assets via a bulk annuity contract, and to Mercer in relation to remaining invested DB assets. The annuity contract makes contractual payments to the Scheme dependent only on the benefits payable under the contract. As a result, the Trustees have minimal direct exposure to risks arising from long-term sustainability issues, including climate change. They are however satisfied that Aviva apply due consideration to ESG issues in the investment of assets underlying the contract.

In June 2024, as noted above, the Trustees agreed to invest the residual Scheme assets across pooled unlevered Gilt funds and a UK Cash fund. The relevant Mercer affiliate is responsible for the appointment and monitoring of a suitably diversified portfolio of specialist sub-investment managers for the assets of each Mercer Fund.

Under these arrangements, the Trustees acknowledge that they do not possess direct authority over the engagement or voting policies and arrangements of the Mercer Funds' managers. However, the Trustees have made Mercer aware that they expect MGIE and MRML to manage assets in a manner, as far as is practicably possible, that is consistent with the Trustees' engagement policy and their policy with regard to the exercise of rights attaching to the Scheme's investments. The Trustees have regularly reviewed reports from Mercer with regard to the engagement and voting undertaken on their behalf in order to consider whether their policies are being properly implemented. For the Scheme's DC assets responsibility is delegated to Legal & General Investment Management (L&G). For the Scheme's DC assets, the responsibility is delegated to Legal & General Investment Management (L&G).

Section 2.1 and 2.2 of this Statement sets out the investment objectives of the Scheme and, if applicable, changes which have been made to the SIP during the Scheme Year, respectively.

Section 2.3 of this statement sets out how, and the extent to which, the policies in the Defined Benefit ("DB") Section and Defined Contribution ("DC") Section of the SIP have been followed. The Trustees can confirm that all policies in the SIP have been followed during the Scheme Year, while the Scheme had invested assets and before the completion of the "buy-in" transaction.

Section 3 and 4 sets out the Trustees' policy with regard to the exercising of rights (including voting rights) attaching to the Scheme's investments and considers how, and the extent to which this policy has been followed during the Scheme Year, while the Scheme had invested assets and before the completion of the "buy-in" transaction. This Section also provides detail on voting activity undertaken by the Scheme's third-party investment managers during the Scheme Year.

Section 2

Statement of Investment Principles

2.1 Investment Objectives of the Scheme

The Trustees believe it is important to consider the policies in place in the context of the objectives it has set.

DB Section

During Q1 2024, the Trustees undertook a “buy-in” by using the majority of the Scheme’s assets to purchase a bulk annuity insurance policy with Aviva, a UK insurance company authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority. Under this policy Aviva undertake, via the Scheme, to pay the Scheme’s benefit obligations as they fall due. The Trustees purchased the policy with Aviva having considered appropriate advice from their advisors. As such, following the transaction with Aviva, the Trustees’ primary objective continues to be to invest the Scheme’s assets in the best interest of the members and beneficiaries, and in the case of a potential conflict of interest in the sole interest of the members and beneficiaries.

DC section

For the DC section of the Scheme, the Trustees’ principal mission is to help members to maximise the value of the members’ retirement benefits subject to acceptable levels of investment risk, management and administration costs, taking into account guidance from the Pensions Regulator and other appropriate industry and regulatory bodies.

2.2 Review of the SIP

No changes were made to the Statement of Investment Principles (SIP) during the Scheme Year. The Trustees last updated the Statement of Investment Principles in June 2024 to reflect the following objectives to help guide them in their strategic management of the assets and control of the various risks to which the Scheme is exposed, i.e. to provide protection for members’ accrued benefits; and to ensure that the Scheme can meet its obligations to the beneficiaries. The Trustees believe the best way of achieving this is by securing all members’ benefits with an insurance company. A copy of the Trustees’ SIP is available at <https://www.princesgroup.com/princes-pension-scheme>.

The objectives set out above and the risks and other factors referenced in this Statement are those that the Trustees determine to be financially material considerations. Non-financial considerations relevant for the Scheme’s accounting year are discussed in the aforementioned June 2024 SIP.

2.3 Assessment of how the policies in the SIP have been followed for the Scheme Year

The information provided in this section highlights the work undertaken by the Trustees during the year, and longer term where relevant, and sets out how this work followed the Trustees' policies in the SIP, dated June 2024, relating to the DC Section of the Scheme only.

In summary, it is the Trustees' view that the policies in the SIP have been followed during the Scheme Year.

Investment Mandates

Securing compliance with the legal requirements about choosing investments

Policy

As required by legislation, the Trustees consult a suitably qualified person when making investment selections by obtaining written advice from its Investment Consultant. The policy is detailed in Section 1 (Introduction) of the SIP, which applies to the DB and DC Sections of the Scheme.

DC

How has this policy been met over the Scheme Year?

The Trustees, under advice from Mercer, invested its residual assets following the completion of the “buy-in” transaction into unlevered Gilts funds and a UK Cash fund. By investing the Scheme’s assets in such a manner, the intention was to create a liquid portfolio with a very high degree of capital preservation while broadly matching the Scheme’s continued exposure to interest rate and inflation risk relating the balancing payment(s) that may be due to Aviva in due course as a result of the completed “buy-in” transaction.

How has this policy been met over the Scheme Year?

The Trustees receive quarterly performance reports from L&G on the DC investment funds. These reports are reviewed by the Trustees to monitor performance against agreed benchmarks and mandates. No investment changes were made during the Scheme Year.

Within the DC Section, the investment performance report is reviewed by the Trustees on a quarterly basis. The Scheme’s investment manager remained highly rated during the year. The investment performance report also includes how each investment manager is delivering against their specific mandates.

Over the year to 31 March 2026, no changes were made to the Scheme’s investment arrangements.

Realisation of Investments

Policy

The Trustees' policy is that there should be sufficient liquidity within the Scheme's assets to meet short term cash-flow requirements in the majority of foreseeable circumstances, so that realisation of assets will not disrupt the Scheme's overall investment policy.

	DC
Policy	Policy
Further details are set out in the following sections of the SIP:	Further details are set out in the following sections of the SIP:
— Realisation of Investments (SIP Section 2.6) — Assets outside of the Bulk Annuity Policy (SIP Section 2.5.1 & 2.5.2)	— Risk Management and Measurement (SIP Section 2.3.) — Policies in relation to the default investment option (SIP Section 3.4.2.) — Realisation of Investments (SIP Section 3.7.)

How has this policy been met over the Scheme Year?

The Scheme's invested residual assets were in daily-dealt pooled fund investment arrangements. These pooled investment arrangements themselves are regulated and underlying investments are mainly invested in regulated markets. Where pooled investment arrangements do not invest assets in regulated markets, these are not expected to account for a material proportion of assets. Therefore, assets should be realisable at short notice, based on member and Trustees' demand.

Where disinvestments were arranged during the year, the policies stipulated within the relevant appointment documentation have been followed.

How has this policy been met over the Scheme Year?

The Trustees are not aware of any liquidity issues over the year in respect of the funds used by the Scheme. All assets are daily-dealt pooled investment arrangements, with assets mainly invested in regulated markets, and were realisable at short notice based on member demand. Where disinvestments or member-directed switches were carried out during the year, these were processed in line with the fund managers' dealing terms and the policies set out in the SIP.

Environmental, Social and Governance (“ESG”)

Financial and non-financial considerations and how those considerations are taken into account in the selection, retention and realisation of investments

Policy

The Scheme’s SIP outlines the Trustees’ beliefs on ESG factors (including climate change). Further details are included in Section 6 of the SIP, which applies to the DB and DC Sections of the Scheme. The Trustees keep the policy under regular review.

DB

The Trustees believe that good stewardship and environmental, social and governance (“ESG”) issues may have a material impact on investment risk and return outcomes. The Trustees also recognise that long-term sustainability issues, particularly climate change, present risks and opportunities that may increasingly require explicit consideration.

The Trustees have implicitly delegated consideration of ESG issues, engagement and stewardship obligations to Aviva in relation to the majority of Scheme’s assets via a bulk annuity contract, and to Mercer in relation to ‘residual’ invested assets. The annuity contract makes contractual payment to the Scheme dependent only on the benefits payable under the contract. As a result, the Trustees have minimal direct exposure to risks arising from long-term sustainability issues, including climate change. They are however satisfied that Aviva apply due consideration to ESG issues in the investment of assets underlying the contract.

Given the nature of the Scheme’s investment policy, member views and non-financially material considerations are not taken into account in the selection, retention and realisation of investments.

DC

For the DC investments, the Trustees have delegated full discretion to L&G for evaluating ESG issues and in exercising stewardship obligations in relation to the DC assets.

Voting and Engagement Disclosures

The exercise of the rights (including voting rights) attaching to the investments and undertaking engagement activities in respect of the investments (including the methods by which, and the circumstances under which, the Trustees would monitor and engage with relevant persons about relevant matters).

Policy

The Trustees' policy is to delegate responsibility for the exercising of rights (including voting rights) attaching to the Scheme's investments to the investment managers. Further details are set out in Section 6. ESG, Stewardship and Climate Change Section. This section of the SIP applies to the DB and DC Sections of the Scheme. In addition, it is the Trustees' policy to obtain reporting on voting and engagement and to periodically review the reports to ensure the policies are being met.

How has this policy been met over the Scheme Year?

The Scheme's investments take the form of shares or units in the Mercer Funds (for the DB Section) and L&G funds (for the DC Section).

Information on the DB Section is largely limited as the invested residual assets consist of unlevered pooled Gilt funds and a UK Cash fund where these funds do not lend themselves to ESG considerations. As the Scheme now also invests in the bulk annuity policy with Aviva, the Trustees recognise that Aviva has full discretion when evaluating ESG issues, exercising rights and stewardship obligations attached to the Scheme's investments, including engagement with issuers of debt and equity and other relevant persons about relevant matters such as performance, strategy, capital structure and management of actual or potential conflicts of interest and risks. In addition, Aviva has full discretion when deciding on the degree to which the above is integrated into their investment processes. The Trustees are satisfied this corresponds with their responsibilities to the beneficiaries.

The DWP 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 provides an update on what constitutes a "most significant vote".

This is applicable to those funds with equity holdings, however, due to the assets of the Scheme being in a bulk purchase annuity policy with Aviva there are currently no voting rights assigned to the Scheme. During the Scheme Year, the control of corporate governance issues have been ceded by the Scheme to Aviva.

Within the residual invested assets there were no voting rights due to the nature of assets held within the funds (unlevered Gilts funds and UK Cash Fund).

Within the DC Section, the Trustees have given L&G full discretion when evaluating ESG issues and in exercising rights and stewardship obligations relating to the Scheme's DC investments.

Section 3 and 4 of this Statement discloses the DC Section's voting and engagement activity to the year ending 31 March 2026.

Monitoring the Investment Managers

Incentivising asset managers to align their investment strategies and decisions with the Trustees' policies

Policy

The Trustees' policy is set out in Section 2.5.2 of the SIP which applies to the DB Section, and Section 3.8 of the SIP which applies to the DC Section of the Scheme.

		DC
How has this policy been met over the Scheme Year?		How has this policy been met over the Scheme Year?
Aviva has been appointed with the aim of ensuring the Scheme's liabilities and reducing the Scheme's funding volatility. The Trustees sought expert advice in relation to this appointment. This included an assessment of Aviva's capabilities, knowledge and experience. The annuity policy is managed in line with the Scheme's specific liabilities and investment requirements. Therefore, the policy is aligned with the Trustees' objectives, and the terms of the policy incentivise Aviva to meet the Trustees' objectives. The Trustees understand that they have no ability to determine or influence the assets in which Aviva invests. The Trustees recognise that the annuity investment is illiquid and cannot be traded. The objective for the passive gilt funds is to track the total return of the relevant market index, within specified tolerances (see below).		As the Trustees invest in pooled investment vehicles it accepts that it has no ability to influence the investment managers to align their decisions with the Trustees' policies set out in this Statement. However, appropriate mandates are selected to align with the overall investment strategy. The Trustees receive investment manager performance reports on a quarterly basis and review the absolute and relative performance against a suitable index used as the benchmark and against the underlying manager's stated target performance.
Fund	Expected Tracking Error $\pm\%$ p.a. over 5 year rolling periods	The Trustees remain comfortable with the investment manager in place.
MGIE UK Long Gilt Fund	Less than 0.25	
MGIE UK Inflation Linked Bond Fund	Less than 0.25	
MGIE UK Cash Fund	0.5	

In the year to 31 March 2025 the Trustees reviewed the investment objectives against which they assess Mercer's performance. These objectives have not been updated since as they remain appropriate for the Scheme's current circumstances. The latest annual assessment was carried out during the Scheme Year in September 2025.

Evaluation of asset managers' performance and remuneration for asset management services

Policy

The Trustees' policy is set out in Section 2.5.2 of the SIP which applies to the DB Section, and Section 3.8 of the SIP which applies to the DC Section of the Scheme.

	DC
How has this policy been met over the Scheme Year? The insurer does not receive on-going remuneration from the Scheme. The premium paid for the annuity policy covers the insurer's implicit fees with the Trustees' choice of insurer taking the size of the premium into account. The Trustees are satisfied that this is the most appropriate basis for remunerating the insurer. Mercer receive income on the Mercer Funds as a percentage of the amount invested. Performance is assessed against the applicable benchmark indices.	How has this policy been met over the Scheme Year? The Trustees monitor the performance of each of the Scheme's funds, including those used in the Lifestyle arrangements, upon receipt of L&G's quarterly reports. This included fund performance against their benchmarks over both quarter, 1 year, 3 year and 5 year time periods. The Trustees' focus is on long-term performance; however, it also takes shorter-term performance into account in reviewing fund performance in light of prevailing market conditions. The funds remained highly rated by the Mercer research team throughout the year. No manager changes were made during the Scheme Year. During the Scheme Year, the charges paid to the Investment Manager for their services were analysed as part of the annual Value for Member (VfM) assessment for the DC Section, which was conducted by the Scheme's Investment Consultant. The VfM assessment concluded that members were receiving good value for the services received.

Monitoring portfolio turnover costs

Policy

The Trustees' policy is set out in Section 2.5.2 of the SIP which applies to the DB Section, and Section 3.8 of the SIP which applies to the DC Section of the Scheme.

DB	DC
How has this policy been met over the Scheme Year? The obligation of the insurer to make payments is not impacted by on-going turnover costs and is not considered by the Trustees. The gilts and cash funds' trading costs are minimal. As such the Trustees do not intend to monitor turnover costs explicitly in relation to these holdings.	How has this policy been met over the Scheme Year? Transaction costs were reviewed during the Scheme Year upon analysis of the Scheme's VfM Assessment. The results were also disclosed in the annual Chair's Statement (the latest Statement is available at: https://www.princesgroup.com/princes-pension-scheme. The transaction costs for each fund covers the buying, selling, lending and borrowing of the underlying securities in the fund by the investment manager. While the transaction costs provided appear to be reasonably reflective of costs expected for the various asset classes and markets that the Scheme invests in, there is not as yet any industry standard or universe to compare these to. The Trustees will continue to monitor transaction costs on an ongoing basis and, where costs are assessed to be disproportionate relative to expectations, will seek an explanation from the relevant investment manager and challenge costs where appropriate.

The duration of the arrangements with asset managers

Policy

The Trustees are a long-term investor and does not seek to change the investment arrangements on a frequent basis. Further details of the Trustees' policy are set out in Section 3.8 of the SIP which applies to the DC Section of the Scheme.

DB and DC

How has this policy been met over the Scheme Year?

The Trustees are a long-term investor; all funds are open-ended and therefore there is no set duration for manager appointments.

Within the DC section, the Trustees may also choose to remove a fund from the strategy if it is no longer considered appropriate. The suitability of the Scheme's DC funds is kept under review by the Trustees on an ongoing basis as part of their quarterly investment monitoring.

The Trustees reviewed the performance of the Scheme's DC funds quarterly. No manager appointments were terminated during the Scheme Year, and the Trustees' policy remained unchanged.

Strategic Asset Allocation

Kinds of investments to be held, the balance between different kinds of investments and expected return on investments

DB	DC
Policy The Trustees' policy on the kinds of investments to be held and the balance between different kinds of investments can be found under the following sections of the SIP: — Investment and Funding Objectives (SIP Section 2.1) — Process for Choosing Investments (SIP Section 2.2) — Investment Strategy (SIP Section 2.4)	Policy The Trustees' policy on the kind of investments to be held and the balance between different kinds of investments can be found under the following sections of the SIP. Further details are set out in the following sections of the SIP: — Investment Objectives (SIP Section 3.1.) — Risk (SIP Section 3.2.) — Investment Strategy (SIP Section 3.3.) — Overall Aims (SIP Section 3.4.1.) — Realisation of Investments (SIP Section 3.7.)

DB	DC
How has this policy been met over the Scheme Year?	How has this policy been met over the Scheme Year?
The Trustees had previously appointed Mercer Limited (Mercer) as the discretionary investment manager and the Scheme's assets were invested in a range of specialised pooled funds (known as the Mercer Funds). In Q1 2024, the Trustees undertook a "buy-in" by using the majority of the Scheme's assets to purchase a bulk annuity insurance policy with Aviva Life & Pensions UK Limited (Aviva), a UK insurance company authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority. Under this policy Aviva undertake, via the Scheme, to pay the Scheme's benefit obligations as they fall due. The Trustees purchased the policy with Aviva having considered appropriate advice from their advisors. As a result of this transaction, Mercer did not have discretion over the Scheme assets as at 31 March 2024. The annuity contract makes contractual payments to the Scheme dependent only on the benefits payable under the contract. In June 2024, the Trustees agreed to invest the residual Scheme assets across pooled unlevered Gilt funds and a UK Cash fund following advice from Mercer. This included advice surrounding the suitability of these funds and the broader investment strategy of the residual assets that was implemented and remained in place at the Scheme year end.	No changes were made to the investment strategy during the Scheme Year. The Trustees remain comfortable with the balance of investments within both the default strategy and the self-select fund range available to members. Throughout the Scheme Year, the Trustees received quarterly performance reports covering all Lifestyle arrangement funds, including performance against benchmarks over short and long-term periods. Fund performance was satisfactory throughout the Scheme Year, consistent with underlying aims and objectives, and the Trustees had no concerns.

Risks, including the ways in which risk are to be measured and managed

DB	DC
Policy The Trustees recognise a number of risks involved in the investment of the assets of the DB Section and that the choice and allocation of investments can help to mitigate these risks. Details of these risks and how they are measured and managed can be found under the following section of the SIP: — Risk Management and Measurement (SIP Section 2.3) How has this policy been met over the Scheme Year? As detailed in Section 2.3 of the SIP, the Trustees considered both the risks associated with the residual invested assets as well as the associated with the bulk annuity contract: 1) Counterparty risk – the risk that Aviva may default on its obligations under the bulk annuity policy. Before entering into the bulk annuity contract, the Trustees obtained and carefully considered professional advice regarding the financial strength of Aviva. The Trustees accepted the advice, namely that Aviva was financially strong and had sufficient capital resources to support the proposed transaction and that, correspondingly, there was no reason in relation to financial strength why the transaction should not proceed. In addition, the Trustees are aware that there is a level of protection offered to members by the Financial Services Compensation Scheme (“FSCS”).	Policy The Trustees recognise a number of risks involved in the investment of the assets of the DC Section and that the choice and allocation of investments can help to mitigate these risks. Details of these risks and how they are measured and managed can be found under the following section of the SIP: — Risk (SIP Section 3.2.) In determining which investment options to make available the Trustees consider the investment risk associated with DC pension investment. The risk can be defined as the uncertainty over the ultimate amount of savings available on retirement. How has this policy been met over the Scheme Year? There were no material changes to this policy during the Scheme Year for the DC Section. As detailed in the risk table in the SIP, the Trustees consider both quantitative and qualitative measures for risks when deciding investment policies, strategic asset allocation, and the choice of delegated investment manager. The Trustees are comfortable with the manager’s ratings applied by its Investment Consultant and continue to closely monitor the ratings and any significant developments at L&G.

DB	DC
2) Liquidity risk – the risk that the Scheme’s assets are not sufficiently liquid to meet the Scheme’s cashflow requirements. The Trustees do not expect to be able to obtain cash from the bulk annuity policy other than in respect of benefits insured with Aviva. Prior to purchasing the policy, the Trustees were satisfied that all known members’ benefits would be insured in full. 3) Lack of diversification – The Trustees recognise that entering into an annuity contract with a single provider represents a concentration of risk. However, the Trustees are satisfied that this risk is acceptable after due diligence on the provider.	

Section 3

Engagement Activity by the Scheme's Investment Managers

DB	DC
The Scheme has not made any allocation to equities for four years. Specifically, following the 2021 strategy review, it was agreed to remove the target allocation to growth assets and adopt a 100% liability hedged position in order to reflect the material funding level improvements that had been experienced. Since then, as noted in this statement, the Scheme has entered into a bulk annuity contract with Aviva and invests residual Scheme assets in a combination of cash and government bonds. As a result, the Scheme does not hold any assets with voting rights.	The Trustees recognise the importance of responsible capital stewardship and believe engagement in ESG matters with DC member investments is important. The Trustees would usually expect its appointed investment managers to carry out this engagement on their behalf and will seek to appoint investment managers whose approach to engagement is consistent with the Trustees' beliefs. The Scheme's investment managers use proxy voting services, with more detail present below. <i>L&G's engagement for change on climate with Fortum Oyj</i> L&G engaged with Finnish energy company Fortum Oyj after it committed in early 2022 to become carbon neutral by 2050, as L&G believed the company needed a more resilient strategy to support sustainable value creation. As part of the Climate Action 100+ initiative, L&G co-led the engagement and, following constructive discussions, Fortum strengthened its climate ambition in March 2023 by bringing forward its carbon neutrality target across scopes 1, 2 and 3 to 2030, committing to exit coal generation by the end of 2027, and agreeing to set an SBTi-validated 1.5°C-aligned emissions target. L&G continued engaging with Fortum in 2025 to better understand how it would achieve its reduction targets, phase out coal, and support a policy environment aligned with its decarbonisation goals. In 2025, Fortum's near- and long-term science-based targets were approved by the SBTi, and the company also published a transition plan with detailed asset-by-asset coal exit plans. Fortum additionally released its latest Climate Lobbying Review. L&G believes the company has taken its feedback into account and that supportive policy

DB	DC
	is essential for an orderly transition to net zero by 2050, helping to protect long-term client value. Aviva subscribes to proxy advisory services for independent research and recommendations including recommendations based on their own policy. These providers include the IVIS service, Glass Lewis and MSCI. Aviva uses research for data analysis only as they have their own robust voting policy, which is applied to all holdings. Aviva also takes into consideration the views of the fund manager and the conversations with the company through our voting specific engagement.

Section 4

Voting Activity during the Scheme Year

DB

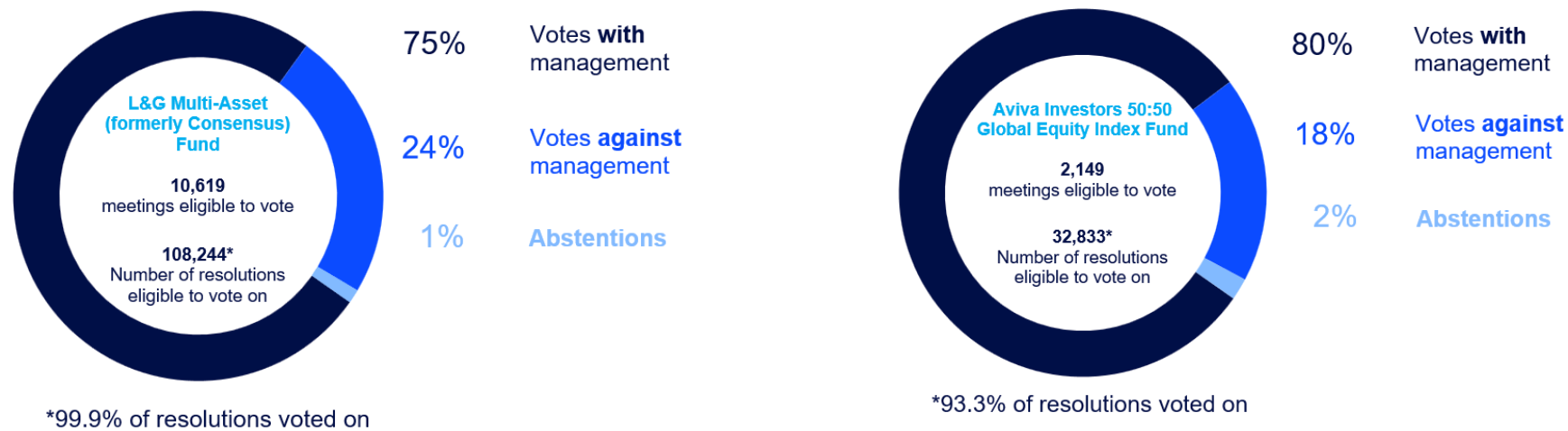
During Q1 2024, the Trustees undertook a “buy-in” by using the majority of the Scheme’s assets to purchase a bulk annuity insurance policy with Aviva, a UK insurance company authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority. Under this policy Aviva undertake, via the Scheme, to pay the Scheme’s benefit obligations as they fall due. The Trustees purchased the policy with Aviva having considered appropriate advice from their advisors. As a result, the Scheme does not hold any assets with voting rights.

DC

The DC Section of the Scheme had no direct relationship with the pooled funds in which it was invested, and therefore no voting rights. The Trustees delegated voting responsibility to the investment managers of those funds.

Although the Trustees were not asked to vote directly, this Statement discloses the voting activity of L&G's equity funds in which DC assets were invested.

Below is a summary of voting activity for L&G-managed DC equity funds for the year ended 31 March 2026. (Non-equity funds and AVC investments are not included, as voting activity is not applicable to these holdings)



Source: Aviva and L&G as at 31 March 2026.

Most significant votes

From October 2022, Trustees are required to identify their key stewardship themes and priorities and report on significant votes linked to these themes/priorities. Significant votes are defined as those that are linked to these key stewardship themes and priorities or are significant for another reason. The Trustees have classified significant votes as:

- **Environmental** – climate change, low carbon transition & physical damage resilience
- **Governance** – inclusive, diverse decision making etc.

The Trustees have reviewed voting records from L&G against these priorities.

The information in this section has been provided directly by L&G, including voting records, rationale and outcomes. The Trustees have considered this information and disclosed the votes that they deem to be most significant. A "significant vote" is defined as one that is linked to the Scheme's stewardship priorities and themes, which are set out above. The Trustees have weighted their selection towards the top three largest holdings within each fund, on the basis that these represent the greatest financial materiality for the Scheme's members. Applying these criteria, the Trustees have selected three votes for disclosure below, which they consider to be the most representative and significant votes cast on their behalf during the Scheme Year.

L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with their investee companies in the three weeks prior to an Annual General Meeting ("AGM") as their engagement is not limited to shareholder meeting topics. Where Aviva was the investment manager, for all the votes displayed in the table, the intent of the vote was communicated by the company if the vote was against management decision.

✗ Resolution not passed ✓ Resolution passed

Fund	Portion of the fund (%)	Company	Date of vote	Resolution	How the Manager voted	Rationale of Manager vote	Final outcome following the vote	Why Vote is Significant	Next Steps
L&G Multi-Asset Fund	0.47	Microsoft Corporation	05/12/2025	Elect Director Satya Nadella	Against	A vote against is applied as L&G expects companies to separate the roles of Chair and CEO due to risk management and oversight concerns.	✓	The Trustee has deemed votes related to governance to be a significant vote.	L&G will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.

Fund	Portion of the fund (%)	Company	Date of vote	Resolution	How the Manager voted	Rationale of Manager vote	Final outcome following the vote	Why Vote is Significant	Next Steps
	0.42	Shell Plc	20/05/2025	Request Company Disclose Whether and How Its: Demand Forecast For LNG; LNG Production And Sales Targets; And New Capital Expenditure In Natural Gas Assets; Are Consistent With Climate Commitments, Including Target To Reach Net Zero Emissions By 2025	Against	A vote against is warranted as while L&G recognises the intent behind the resolution, they have decided to vote against it following careful consideration. This decision follows a series of constructive engagements with Shell's leadership, during which the company committed to improving disclosures on stranded asset risks and financial resilience related to its LNG operations. L&G acknowledges meaningful progress in Shell's reporting, which now provides a clearer basis for assessing climate-related risks. In light of these developments, L&G believes the resolution's key objectives are being addressed through ongoing company actions.	×	The Trustee has deemed votes related to climate to be a significant vote.	L&G Asset Management business will continue to engage with their investee companies, publicly advocate their position on this issue and monitor company and market-level progress.
	0.28	Prologis, Inc.	08/05/2025	Elect Director Hamid R. Moghadam	Against	A vote against is applied as L&G expects companies to separate the roles of Chair and CEO due to risk management and oversight concerns.	N/A*	The Trustee has deemed votes related to governance to be a significant vote.	L&G Asset Management business will continue to engage with their investee companies, publicly advocate their position on this issue and monitor company and market-level progress.

Source: L&G as at 31 March 2026.

*At the time of writing, the final outcome of the vote was not disclosed by L&G.

MARSH

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