BARNETT WADDINGHAM

Part of HOWDEN

Implementation Statement

The First Bus Retirement Savings Plan ("the Plan")

Purpose of this statement

This implementation statement has been produced by the Trustee ("The Trustee") of the **First Bus Retirement Savings Plan ("the Plan")** to set out the following information over the year to **5 April 2025**:

	how the Trustee's policies on exercising rights (including voting rights) and engagement activities have been followed over the year;
	the voting activity undertaken by the Plan's investment managers on behalf of the Trustee over the year, including information regarding the most significant votes;
	A summary of any changes to the Statement of Investment Principles (SIP) over the period;
	A description of how the Trustee's policies, included in their SIP, have been followed over the year.

The voting behaviour is not given over the Plan year end to 5 April 2025 because investment managers only report on this data quarterly, we have therefore given the information over the year to 31 March 2025.

Conclusions

In reviewing the activities of the past year, the Trustee believes that the policies set out in the Statement of Investment Principles ("SIP") have been effectively implemented. A significant proportion of the Plan's investment managers have demonstrated transparency in their voting and engagement activities, and the Trustee believes that these activities reasonably align with the with the stewardship priorities of the Plan.

However, not all managers were able to provide all the voting and engagement information at the requested dates. We will continue to engage with the managers to encourage them to improve the availability and quality of data.

Stewardship policy

The Trustee's Statement of Investment Principles ('SIP') in force at 5 April 2025 describes the Trustee's stewardship policy on the exercise of rights (including voting rights) and engagement activities. It was last reviewed in January 2024 and has been made available online here:
https://firstbuspensionschemetrustee.co.uk/wp-content/uploads/2024/10/2023-12-First-Bus-Retirement-Savings-Plan-SIP-v2.0.pdf

The Trustee has set stewardship priorities in order to concentrate their stewardship efforts in areas that are most relevant to the Plan. The current stewardship priorities are:

- **Climate change:** For example, companies should put in place clear plans to achieve Net Zero, including meaningful interim targets ideally with independent verification. Each company's targets should reflect the nature of their business activities, as well as the country and sector in which they operate.
- **Diversity, Equity & Inclusion**: For example, companies should strive to promote the representation and participation of different groups, reflecting academic evidence that diverse teams tend to make better decisions.

The Trustee expects managers to be able to evidence their stewardship activity in these areas.

The Trustee's stewardship policy is set out in the Plan's policies on voting and engagement, which forms part of the SIP. To enable the Trustee to make high quality decisions, the fact-finding and analysis is delegated to the Trustee's independent investment advisor.

The Trustee has communicated these stewardship priorities to Aegon. Managers are expected to be able to evidence their stewardship activity in these areas. The Trustee will also consider alignment with these priorities in the selection, retention, monitoring, and realisation of funds held, alongside other relevant factors. However, the Trustee acknowledges that continued pressure needs to be placed across the industry to improve disclosures. Therefore, to the extent concerns are identified, they will engage with their managers in the first instance, often via their investment consultant.

The Trustee otherwise delegates responsibility for stewardship activities attaching to the Plan's investments to its investment manager. Managers are also expected to exercise voting powers with the objective of preserving and enhancing long-term shareholder value. In addition to the exercise of voting rights, the manager is expected to engage with key stakeholders (which may include issuers of debt or equity, corporate management, regulators and governance bodies) relating to its investments in order to improve corporate behaviours and governance, improve performance and social and environmental impact and to mitigate financial risks.

The Trustee periodically reviews engagement activity undertaken by its investment manager to ensure that the policies outlined above are being met and may explore these issues with its investment manager as part of the ongoing monitoring of the ESG integration and stewardship activities of its investment managers.

The Trustee is supportive of the UK Stewardship Code published by the Financial Reporting Council and expects the Plan's investment manager to have corporate governance policies in place which comply with these principles.

How voting and engagement/stewardship policies have been followed

The Trustee's policy on voting and engagement is set out in the Plan's ESG and Stewardship Policy, which forms part of the SIP. Based on the information provided by the Plan's investment managers, the Trustee believes that its policies on voting and engagement have been met in the following ways:

To ensure that the investment policies set out in the SIP are taken by persons or organisations with the skills, information and resources necessary to take them effectively, the Trustee delegates certain responsibilities to its bundled pension provider, Aegon – the Plan's default investment option is structured as a 'governed' investment solution, which is designed and implemented by Aegon. Aegon is responsible for the selection and deselection of the underlying investment managers used through the default investment option as well as the ongoing relationships with the investment managers. The Plan invests entirely in pooled funds, and as such delegates responsibility for carrying out voting and engagement activities to the Plan's fund managers.

The Trustee undertook an initial review of the stewardship and engagement activities of the current managers when the Plan inherited the investment strategy, and were satisfied that their policies were reasonable, and no immediate remedial action was required at that time. The Trustee carries out a strategy review at least every three years where it assesses the continuing relevance of the strategy in the context of the Plan's membership and its aims, beliefs and constraints.

Annually the Trustee receives and reviews voting information and engagement policies from the asset managers, which it reviews to ensure alignment with its own policies and priorities. The Trustee plans to complete this annual review later in 2025, and will consider ESG, engagement and voting as part of this review.

The Trustee has asked its investment advisor to assist with providing climate emissions monitoring of the investments. This annual review will help the Trustee to understand the impact of the investments for an average member and the improvements Aegon are able to make year on year to the scale of emissions. The Trustee had not received this review prior to the date of this Implementation Statement.

The Trustee takes time to ensure it has obtained training on ESG considerations in order to understand fully how ESG factors including climate change could impact the Plan and its investments. The Trustee has previously arranged for a training session on stewardship priorities and subsequently implemented a set of stewardship policies for the Plan detailed above. On an ad hoc basis, the Trustee uses ESG ratings information provided by its investment consultant, to assess how the Plan's investment managers take account of ESG issues. The Trustee intends to review it's ESG, engagement and voting policies in the coming year.

Over the year, the Trustee reviewed the appropriateness of the self-select fund range offered to the Plan's membership. The Trustee concluded that a change was needed and implemented a new wider range of funds in March 2025. The new funds include a wider range of ESG integrated funds, offering individual members the opportunity to invest in a more (or less) ESG focussed way than the Trustee deems suitable via the default. In selecting the new fund range, the Trustee, Aegon and its investment advisor considered the ESG and engagement credentials of the funds. The Trustee was satisfied that the new funds engage with underlying companies in line with its own policies.

Last year, the Trustee observed that a notable proportion of significant climate votes made did not completely align with their communicated priorities, the Trustee noted that the responsibility to engage further with BlackRock lies with Aegon in the first instance. The Trustee communicated this observation to Aegon who provided the following statement:

"Alignment of BlackRock's voting with our own expectations and for the best interests of our members has been, and still is, one of our key engagement objectives with BlackRock. In 2023 we engaged with Blackrock's senior management on multiple occasions to understand their low level of alignment with our Expression of Wish (EoW) voting approach. Key discussions points have been their views on the impact of the quality and prescriptiveness of several shareholder resolutions and concerns on negative impacts on financial returns, which impacted their support on these, and providing us with alternative evidence of their engagement and voting to support climate change issues as well as our social priority engagement themes of DEI and Human Rights.

Whilst we are encouraged by this alternative evidence, we continue to closely monitor BlackRock's voting activity through our expanded EoW approach for 2024, with a wider subset of companies and monitoring alignment against our detailed voting guidelines). More recently, we welcome the publication of BlackRock's new decarbonisation stewardship policy, of which we have contributed to its development, which has the potential to further align BlackRock's voting in line with our own climate expectations from Q4 2024."

Following this, the Trustee, at a meeting on 3 October 2024, received a presentation from Aegon's Stewardship Lead on their expression of wishes, decarbonisation and influence over BlackRock. The Trustee was satisfied that Aegon's stewardship priorities were broadly aligned with their own stewardship priorities. The Trustee observed some misalignment with Aegon and BlackRock voting but was reassured to see progress had been made on this to date, and reassurances that further progress was expected in the coming year.

This year, BlackRock (the underlying fund manager used by Aegon) provided 70 significant votes on the default fund over the accounting year. The Trustee has reviewed these votes (some of which are detailed below) against their stewardship priorities. While the Trustee observes that a notable proportion of significant climate votes made do not completely align with their communicated priorities, the Trustee notes that the responsibility to engage further with BlackRock lies with Aegon in the first instance. The Trustee has communicated this observation to Aegon who provided the following statement:

"Unfortunately, as the 2025 proxy season has only recently 'closed' we (Aegon) have not yet completed the necessary EoW analysis of all the underlying fund manager activity. However, once we have this information, we would be happy to share. Alongside the results of our annual fund manager RI questionnaire, it will be used to inform our ongoing engagement strategy with BlackRock (and our other managers).

As you are aware, BlackRock's alignment to our voting policy was poor during the 2024 proxy season, although it improved from the previous year. We therefore continue to engage with BlackRock on its alignment with our key engagement themes, but with the implementation of the company's decarbonisation stewardship guidelines (which we contributed to) and the continued participation (through its international arm) of Climate Action 100+ (the world's largest climate investor collaborative engagement initiative), we expect alignment to continue to improve

Our Expression of Wish (EoW) approach was expanded to 100 priority companies in 2024 (compared to fewer than 10 in 2023) targeting our biggest 500 holdings within our default funds and those we deem as most exposed to ESG risks relevant to our engagement themes (Climate, Nature, DEI and Human Rights)."

The Trustee is satisfied that Aegon continues to align with their stewardship priorities and will consider the EoW analysis further in due course. The Trustee expects to see an improvement in alignment year on year, and should this not be the case, will consider taking further action. The Trustee therefore has reservations that the fund manager has acted entirely in accordance with the Plan's voting and engagement/stewardship policies over the period, but remains comfortable with the actions of the managers to date. The Trustee will, however, continue to monitor progress and alignment with their own stewardship priorities.

How the SIP has been followed over the year

There were no amendments made to the SIP during the reporting period. Over the year to 5 April 2025, the Trustee reviewed the self-select fund range offered to members to ensure that the range of funds remained appropriate for the membership and continued to offer good value for money. Details of the changes to the self-select fund range can be found in the "Policies on investment strategy" section below. The Trustee will update the Statement of Investment Principles to reflect these changes in due course. In the Trustee's opinion, the Statement of Investment Principles has been followed over the year in the following ways:

Investment Strategy and Implementation

Policy 1

The Plan offers a suitable default investment option for members, that targets returns ahead if inflation in the accumulation phase, de-risks as members approach retirement and acknowledges the membership profile and membership experience.

The Plan was setup during the reporting period to 5 April 2024, and the default strategy was imported from another Scheme. The Trustee undertook suitable due diligence, and took 'day-one' advice, on the default investment strategy during the setup period and remains comfortable with the strategy and delegation of responsibility to Aegon. The Trustee, supported by the Trustee's professional advisers, will review the strategy suitability later in 2025. The Trustee reviews the strategy at least every three years, and takes into consideration the membership profile, as well as experience of how members are accessing their benefits. The Trustee has made no new manager appointments over the year.

The accumulation phase of the default has provided returns in excess of inflation (as measured by the Consumer Price Index) over a 5-year period at 31 March 2025 and is therefore deemed by the Trustee to achieve the policy. The LifePath strategy currently de-risks over a 35-year period, helping to ensure members pots de-risk over time.

Over the year to 5 April 2025, the Trustee was made aware of changes Aegon plan to make to the LifePath default in which members invest. These changes include a shortening of the glidepath (period of time in which members de-risk prior to targeted retirement age) and a change to the structure of the default to provide greater flexibility for changes in the future. The changes will be made in during 2025, after the accounting period end, and the Trustee will update the Statement of Investment Principles to reflect these changes in due course.

Policy 2

An appropriate range of self-select options is made available.

The Plan was setup during the reporting period to 5 April 2024 and the self-select strategy was imported from another Scheme. The Trustee undertook suitable due diligence, and took 'day-one' advice, on the self-select investment and alternative lifestyle options during the setup period and remains comfortable with the strategy and delegation of responsibility to Aegon.

Over the year to 5 April 2025, the Trustee reviewed the self-select fund range offered to members to ensure that the range of funds remained appropriate for the membership and continued to offer good value for money. The Trustee concluded that changes should be made to the fund range. All funds within the existing self-select range offered by Aegon and the Trustee (except for the UK Bus Shariah Global Equity Fund and the LifePath range of funds) were closed and the money in which members had invested in these funds (and the future contributions to them) were moved.

Any members that were impacted by the outlined self-select fund changes were provided with communication on the planned changes and given the option to continue to self-select where my pension savings are invested.

The new wider range of self-select funds, with fund names that more clearly reflect the underlying fund in which members' money is invested, was instated. Please note that as at 5 April 2025, there are no members invested in the previous self-select fund range. Given these changes were implemented close to the accounting year end, the Statement of Investment Principles is in the process of being updated and will made available online once complete.

Policy 3

To take advice on the strategy from their advisors and consult with the employer before making any changes.

The Trustee' advisors and an employer representative attend Trustee meetings, so that advice is provided as required and the employer is consulted on any changes.

Advice was received in respect of the changes to the self-select fund range. The employer was also consulted on this change. No other strategic changes were made during the period.

Policy 4

To review the investment strategy's suitability on an ongoing basis, including the objectives of the Plan

As above, the Trustee has reviewed the self-select options available via the investment strategy. The Trustee intends to review the investment strategy later in 2025. This review will consider the existing membership demographic and alternative Providers.

The Trustee also has plans to consider options available to members post-retirement. The Trustee monitors the investments quarterly, taking ongoing advice from the investment advisors on the suitability of the strategy.

The Trustee considers objectives of the Plan and performance versus their objectives as part of the triennial strategy review.

Policy 5

To consider various risks when designing and providing suitable investment choices to members

The Trustee takes into account of inflation, conversion, retirement income, investment manager, concentration/market, currency and loss of investment and ESG risks as part of the strategy review. These risks are reviewed ad-hoc as part of ongoing monitoring and Trustee meetings.

The Trustee offers members alternative target end points for retirement and engages with Aegon around the furtherment of their offerings in this space.

Custodian risk is monitored by the Trustee on an ad hoc basis but is delegated to Aegon who directly appoint the managers and associated custodians. The Trustee accounts for the custodians of the funds in its annual accounts.

Policies on monitoring manager and advisor performance and manager arrangements

Policy 1

To review manager performance

The Trustee monitors the performance of the manager funds annually to ensure that the funds are meeting their stated objectives. The Plan produces an investment monitoring report quarterly which is discussed at Trustee meetings and provides context of return versus peers. Aegon attend the quarterly Trustee meetings, helping to provide performance context for the Trustee to review. The Trustee considers the risk and return balance, as well as returns versus their Plan objectives as part of the triennial strategy review.

Policy 2

To review manager conflicts of interest policies

The Plan invests in pooled funds with Aegon with set investment objectives and fixed pricing. The Trustee expects the investment manager to have a conflict-of-interest policy in relation to their engagement and ongoing operations. As such the Trustee considers manager conflicts to be low risk for the Plan.

Policy 3

Monitor portfolio turnover costs

The Trustee considers total costs of the investments as part of the Value for Member assessment annually. The Trustee considered the costs of investments offered as part of the self-select fund option review and was satisfied no funds offered materially poor value for money.

Policies on ESG

Policy 1

Ongoing review of the investment managers' policies on ESG, stewardship and engagement.

The Plan invests entirely in pooled funds via the Aegon platform, and as such, the responsibility for carrying out voting and engagement activities has been delegated to the Plan's fund managers. The Trustee, completed suitable due diligence, and took 'day-one' advice, during the setup period and remains comfortable with the Environmental, Social and Governance (ESG) and stewardship policies of Aegon and the Plan's pooled fund managers. As such, no immediate action has been taken. The

Trustee will further assess the ESG and stewardship policies of Aegon and the Plan's pooled fund managers as part of any updates to the investment strategy.

The Trustee, supported by its professional advisers, monitor ESG characteristics of the Plan's default investment option quarterly. The default has seen a number of positive changes enacted which reflect the Trustee's beliefs regarding ESG considerations. Aegon also provides quarterly investment performance reporting to support the Trustee with this review.

The Trustee has asked it's investment advisor to assist with providing climate emissions monitoring of the investments. This annual review will help the Trustee to understand the impact of the investments for an average member and the improvements Aegon are able to make year on year to the scale of emissions. The Trustee had not received this review prior to the date of this Implementation Statement.

The Trustee considers it's investment advisors ESG ratings as part of its triennial strategic review, and when making fund changes.

Policy 2 *Non-financial matters did not influence the investment strategy over the Plan year.*

The Trustee did not make any allowance for non-financial matters and did not consider any member views for incorporation into its ESG policy over the Plan year.

The Trustee does offer a Shariah compliant self-select member option. As part of the self-select fund review, the Trustee took care to ensure this option remained available, and that no members would see they investments in these funds moved to a non-compliant fund against their will. The Trustee has also engaged with Aegon around the availability of alternative, lower risk, Shariah fund options it could make available.

Policy 3 *Communicating ESG and stewardship with Plan members.*

The Trustee expects that the annual communication to members regarding ESG and stewardship will be addressed in this annual Implementation Statement. This document is a statutory report and will continue to be produced on an annual basis alongside the Plan's Annual Report and Accounts.

Policy 4 *The Trustee will obtain regular training on ESG considerations*

The Trustee receives training in order to understand fully how ESG factors including climate change could impact the Plan and its investments. The Trsutee has invited Aegon, the arrangement provider to all Trustee meetings to provide training on changes to the default where needed.

The Trustee plans to undertake a review of their ESG policies post reporting period end, and as part of this, will receive training on ESG. Likewise, the Trustee receives ESG training from its advisors as part of its triennial review and quarterly monitoring.

Policies on voting and engagement

Policy 1

To monitor and engage with managers on stewardship by requesting ESG reports and asking managers to cover ESG when at meetings

The Trustee reviews the voting data provided by the investment managers (Blackrock, HSBC & Dimensional) as part of this Implementation Statement process. The Trustee's advisors requested voting and engagement data from each manager using the template provided by the PLSA. The managers have provided data as shown further in this Statement. Having reviewed the voting and engagement data provided by the managers, the Trustee is comfortable with the actions of the fund managers. The Trustee will, however, continue to monitor progress and alignment with their own stewardship priorities.

Policy 2

Managers are expected to be able to evidence their stewardship activity in the areas that the Trustee has communicated as a priority

The Trustee has set climate change and diversity, equity and inclusion as their stewardship priorities. These priorities have been communicated to Aegon, for Aegon to engage with underlying managers. The Trustee monitors voting alignment with these priorities as part of their annual implementation statement. During the year to date, the Trustee received a presentation from Aegon on their voting alignment with BlackRock (the primary underlying investment manager). The Trustee has requested statements from Aegon on their progress towards further alignment with BlackRock voting, particularly in the areas the Trustee has set as a priority.

Prepared by the Trustee of the First Bus Retirement Savings Plan
June 2025

Voting Data

Investment managers report voting data on a quarterly basis. As a result, the information included in this section covers the year to 31 March 2025.

The equity allocation for the LifePath Flexi, LifePath Capital and LifePath Retirement lifestyle funds is the same in terms of the underlying funds used. As such the voting data and significant votes will be identical for these lifestyle funds. Fund's underlying the LifePath default target date funds (such as the iShares Global Property Securities Equity Fund (UK)) that include voting rights are included within the LifePath voting data. The underlying funds with no voting rights (held in commodity swap, corporate bonds, government bonds, emerging market debt and cash asset classes) are not included here.

The funds that underlie the Aegon self-select property fund (held with BlackRock, Columbia Threadneedle, LGIM and Standard Life), the BlackRock cash and government bond funds, and the Aberdeen Standard Life Corporate Bond Fund have no voting rights and limited ability to engage with key stakeholders given the nature of the mandate.

The new self-select fund range was held for a matter of days during the accounting period, and as a result, relevant voting and engagement on these funds was not available. These funds are not reported on below.

Manager	BlackRock	BlackRock	BlackRock	BlackRock	BlackRock	HSBC	Dimensional
Fund name	LifePath	ACS UK Equity Tracker	ACS World ex UK Equity Tracker	ACS World ESG Screened and Optimised Equity Tracker	Dynamic Diversified Growth Fund	CCF Islamic Global Equity Index	Emerging Markets Core Equity Fund
Structure	Pooled						
Ability to influence voting behaviour of manager	The pooled fund structure means that there is limited scope for the Trustee to influence the manager's voting behaviour. The Trustee has however set and communicated stewardship priorities.						
No. of eligible meetings	7,585	684	1,891	434	477	105	915

Manager	BlackRock	BlackRock	BlackRock	BlackRock	BlackRock	HSBC	Dimensional
No. of eligible votes	76,316	9,642	24,298	6,679	6,515	1,719	5,141
% of resolutions voted	96%	99%	94%	92%	93%	96%	100%
% of resolutions abstained[1]	1%	0%	0%	0%	0%	0%	0%
% of resolutions voted with management[1]	91%	97%	94%	97%	95%	78%	84%
% of resolutions voted against management[1]	8%	2%	5%	2%	4%	21%	16%
% of meetings, where they voted and voted at least once against management	33%	13%	26%	16%	25%	78%	45%
Proxy voting advisor employed	Institutional Shareholder Services ("ISS")						
% of resolutions voted against proxy voter recommendation[1]	0%	0%	0%	0%	0%	1%	n/a

[1] As a percentage of the total number of resolutions voted on. Totals may not add up to 100%. Numbers are subject to rounding. Sum's may not total 100% due to rounding.

Significant votes

The change in Investment and Disclosure Regulations that came into force from October 2020 requires information on significant votes carried out on behalf of the Trustee over the year to be set out. The guidance does not currently define what constitutes a "significant" vote. However, recent guidance states that a significant vote is likely to be one that is linked to one or more of a Plan's stewardship priorities. Over the period the Trustee set the following stewardship priorities for the Plan:

- Climate change;
- Diversify, Equity & Inclusion.

BlackRock, HSBC and Dimensional have provided a selection of votes which they believe to be significant. The Trustee selected 3 of the most significant votes for each fund which relate to the stewardship priorities of the Plan, where possible. Despite continued work with managers to improve reporting standards, BlackRock have failed to provide all details requested on these votes. The manager does however, provide additional detail on engagements and votes made at a firm level. If you would like to review these detailed significant votes then these can be found online: BlackRock 'vote bulletins' - https://www.blackrock.com/corporate/about-us/investment-stewardship. A summary of the significant votes provided is set out below.

BlackRock, LifePath Flexi

	Vote 1	Vote 2	Vote 3
Company name	Berkshire Hathaway Inc.	Phillips 66	Denny's Corporation
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	Data not provided		
Summary of the resolution	Disclose Berkshire Hathway Energy's emissions and progress towards goals	Report on impacts of a significant reduction in virgin plastic demand	Disclose Greenhouse Gas emissions reductions targets
How the manager voted	For	Against	For
Rationale for the voting decision	BlackRock believe additional information regarding the company's plan to manage their strategy in the context of a transition to a low-carbon economy will help investors assess long-term risks and opportunities on this economically material issue	BlackRock believe the company already provides sufficient disclosure and/or reporting regarding this issue, or is already enhancing its relevant disclosures	BlackRock believe it is in the best interests of shareholders to have access to greater disclosure on this issue
Outcome of the vote	Fail	Fail	Fail
Implications of the outcome	Data not provided		
Criteria on which the vote is considered "significant" (by the manager)	Data not provided		

BlackRock, ACS UK Equity Tracker

BlackRock only provided votes from two company meetings.

	Vote 1	Vote 2	Vote 3
Company name	Shell Plc	Shell Plc	Diageo Plc
Approximate size of fund's holding as at the date of the vote (as % of portfolio)		Data not provided	
Summary of the resolution	Advise Shell to align its medium-term emissions reduction targets covering the Greenhouse Gas Emissions of the use of its energy products (Scope 3) with the goal of the Paris Climate Agreement	Approve the Shell Energy Transition Strategy	Re-elect Ireena Vittal as Director
How the manager voted	Against	For	For
Rationale for the voting decision	BlackRock believe the request is either not clearly defined, too prescriptive, not in the purview of shareholders, or unduly constraining on the company	Rationale not provided	BlackRock believe the nominee serves on an excessive number of public company boards, which they believe raises substantial concerns about the director's ability to exercise sufficient oversight on this board.
Outcome of the vote	Fail	Pass	Pass
Implications of the outcome		Data not provided	
Criteria on which the vote is considered "significant" (by the manager)		Data not provided	

BlackRock, ACS World ex UK Equity Tracker

	Vote 1	Vote 2	Vote 3
Company name	The Walt Disney Company	Nestle SA	PACCAR Inc
Approximate size of fund's holding as at the date of the vote (as % of portfolio)		Data not provided	
Summary of the resolution	Report on gender-based compensation and benefits inequities	Report on non-financial matters regarding sales of healthier and less healthy foods	Report on climate lobbying
How the manager voted	Against	Did Not Vote	Against

	Vote 1	Vote 2	Vote 3
Rationale for the voting decision	BlackRock believe the company already provides sufficient disclosure and/or reporting regarding this issue, or is already enhancing its relevant disclosures	Rationale not provided	BlackRock believe the company already has policies in place to address the request being made by the proposal, or is already enhancing its relevant policies
Outcome of the vote	Fail	Fail	Fail
Implications of the outcome		Data not provided	
Criteria on which the vote is considered "significant" (by the manager)		Data not provided	

BlackRock, ACS World ESG Screened and Optimised Equity Tracker

	Vote 1	Vote 2	Vote 3
Company name	Exxon Mobil Corporation	PepsiCo, Inc.	Amazon.com, Inc.
Approximate size of fund's holding as at the date of the vote (as % of portfolio)		Data not provided	
Summary of the resolution	Report on reduced plastics demand impact on financial assumptions	Report on risks related to biodiversity and nature loss	Report on efforts to reduce plastic use
How the manager voted	Against	Against	Against
Rationale for the voting decision	BlackRock believe the company already provides sufficient disclosure and/or reporting regarding this issue, or is already enhancing its relevant disclosures	BlackRock believe the company already provides sufficient disclosure and/or reporting regarding this issue, or is already enhancing its relevant disclosures	BlackRock believe the company already provides sufficient disclosure and/or reporting regarding this issue or is already enhancing its relevant disclosures
Outcome of the vote	Fail	Fail	Fail
Implications of the outcome		Data not provided	
Criteria on which the vote is considered "significant" (by the manager)		Data not provided	

BlackRock, Dynamic Diversified Growth

BlackRock only provided three votes for this fund, all from the same company.

	Vote 1	Vote 2	Vote 3
Company name	UniCredit SpA	UniCredit SpA	UniCredit SpA
Approximate size of fund's holding as at the date of the vote (as % of portfolio)		Data not provided	
Summary of the resolution	Approve Remuneration Policy	Authorize Board to Increase Capital to Service the 2024 Group Incentive System	Authorize Issuance of Shares to Be Subscribed Through a Contribution in Kind of Shares of Banco BPM SpA
How the manager voted	For	For	For
Rationale for the voting decision	Poor use of remuneration committee discretion regarding increases.	Poor use of remuneration committee discretion regarding the grant of a one-off award. Disclosure does not provide sufficient understanding of the company's remuneration policies and the	Rationale not provided
Outcome of the vote	Pass	Pass	Pass
Implications of the outcome		Data not provided	
Criteria on which the vote is considered "significant" (by the manager)		Data not provided	

HSBC, CCF Islamic Global Equity Index

	Vote 1	Vote 2	Vote 3
Company name	Meta Platforms, Inc.	Tesla, Inc.	Eli Lilly and Company
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	4.41%	2.53%	2.27%
Summary of the resolution	Report on framework to assess company lobbying alignment with climate goals	Commit to a moratorium on sourcing minerals from deep sea mining	Report on effectiveness of Diversity, Equity, and Inclusion efforts
How the manager voted	For	For	For
Rationale for the voting decision	HSBC believe that the proposal would contribute to the better management of climate issues, particularly relating to lobbying	HSBC believe that the proposal would contribute to the better management of nature-related risk	HSBC believe that the proposal would improve transparency on equality issues

	Vote 1	Vote 2	Vote 3
Outcome of the vote	Fail	Fail	Fail
Implications of the outcome	HSBC will likely vote in a similar way on a similar proposal should they see insufficient improvements		
Criteria on which the vote is considered "significant" (by the manager)	The company has a significant weight in the portfolio and HSBC voted against management		

Dimensional, Emerging Markets Core Equity Fund

	Vote 1	Vote 2	Vote 3
Company name	RCL Foods Limited	Bharat Heavy Electricals Limited	African Rainbow Minerals Ltd.
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	0.0016%	0.0689%	0.0431%
Summary of the resolution	Elect Members of Audit Committee	Elect Directors	Elect Directors
How the manager voted	Against	Against	Against
Rationale for the voting decision	Dimensional voted against non-independent members of the Audit Committee because they believe market best practice is for members of the Audit Committee to be independent.	Dimensional voted against non-independent directors because they believe the level of board independence was below the market requirement.	
Outcome of the vote	Pass	Pass	Pass
Implications of the outcome	Dimensional will continue to monitor the independence of the Audit Committee and may continue to vote against directors if the members of the committee remain non-independent.	Dimensional will continue to monitor the independence of the board and may continue to vote against directors if the board fails to comply with market best practice.	
Criteria on which the vote is considered "significant" (by the manager)	Dimensional believes these votes are key to protecting shareholder interests. Director elections are one of the key areas of focus for Dimensional globally. Shareholders elect the board of a Portfolio Company to represent their interests and oversee management and expect boards to adopt policies and practices that align the interests of the board and management with those of shareholders and limit the potential for conflicts of interest.		

Engagement

The investment managers may engage with investee companies on behalf of the Trustee. The table below provides a summary of the engagement activities undertaken by each manager during the year for the relevant funds.

BlackRock have not provided engagement reports for funds with little scope for engagement. As such, the BlackRock Over 15 Years Gilts Index, BlackRock Index Linked Gilt Index and BlackRock cash fund are not included in the table below.

Manager	BlackRock	BlackRock	BlackRock	BlackRock	BlackRock	Blackrock	HSBC
Fund name	LifePath	ACS UK Equity Tracker	ACS World Ex UK Equity Tracker	ACS World ESG Equity Tracker	Dynamic Diversified Growth Fund	ACS World ESG Screened and Optimised Equity Tracker	CCF Islamic Global Equity Index
Number of engagements undertaken on behalf of the holdings in this fund in the year	530	180	1,320	527	427	527	70
Number of entities engaged on behalf of the holdings in this fund in the year	349	118	850	305	262	305	40
Number of engagements undertaken at a firm level in the year	2,994	2,994	2,994	2,994	2,994	2,994	1.640

Manager	Dimensional	Aberdeen*	Columbia Threadneedle*	LGIM	Standard Life	Blackrock
Fund name	Emerging Markets Core Equity Fund	Standard Life Corporate Bond Fund	Threadneedle Pensions Property	LGIM Property	Standard Life Pooled Property	BlackRock iShares UK Property
Number of engagements undertaken on behalf of the holdings in this fund in the year	3	n/a	n/a	n/a	n/a	n/a
Number of entities engaged on behalf of the holdings in this fund in the year	3	n/a	n/a	n/a	n/a	n/a
Number of engagements undertaken at a firm level in the year	111	1,868	942	4,459	n/a	2,994

* Due to availability of data, engagements have been provided of the year to 31 December 2024.

Examples of engagement activity undertaken over the year to 5 April 2025

Aberdeen

Anglian Water Services

In April 2024, Aberdeen followed up on their previous engagements with Anglian Water, a leading UK water company providing water supply, sewerage, and sewage treatment services. Aberdeen had previously emphasised the importance of Anglian publishing a live sewage discharge map, similar to those provided by their industry peers, to offer customers and investors greater transparency into the environmental impacts of their operations. During this engagement, Aberdeen wanted to review their progress and the outcomes of their efforts to address this issue.

Aberdeen 's engagement began in 2023 when they met with Anglian Water as part of their UK water utilities thematic engagement programme. Anglian is a strong performer in many environmental areas but experienced a decline in performance in certain aspects. Aberdeen sought to identify the root cause of their drop in performance, particularly in areas such as serious pollution incidents, and to understand the plans in place to address these issues. Anglian's recent increase in serious pollution incidents was largely attributed to extreme weather storm overflows, and they shared details of accelerated monitoring efforts to prevent further occurrences. However, Aberdeen discussed potential areas for improvement in their disclosure, including the need for a publicly available live sewage discharge map. In April 2024, Aberdeen followed up on this milestone to review Anglian's progress. While Anglian is viewed as middle of the pack in terms of environmental performance compared to other UK water utilities, they continue to lag behind peers in serious pollution incident metrics. Therefore, improving both performance and disclosure in this area remained a focal point of their engagement with Anglian.

Aberdeen were pleased to hear in their 2024 engagement with the company that Anglian had recently released a live sewage discharge map, providing detailed information on their drainage and wastewater management plans. This outcome enabled us to close this milestone with the company and highlights how their active engagement helped to drive meaningful improvements in transparency and accountability at Anglian Water.

Blackrock

The Walt Disney Company (Disney)

BlackRock has had multiyear engagements with the company to discuss how its governance and long-term strategy align with long-term financial performance. The company's performance in recent years has attracted shareholder activist campaigns.

In advance of the AGM, BlackRock engaged with Disney's board and leadership, as well as dissident investors to better understand how the proposed strategies will add long term financial value to Disney. Ultimately, BlackRock voted in support of the management's recommended directors, a proposal which received majority shareholder support.

In BlackRock's opinion, Disney's board and management have taken steps to restore investor confidence, have been responsive to shareholders and have demonstrated progress in implementing the company's revised strategy.

Dimensional

Impala Platinum Holdings

In November 2023, Impala Platinum Holdings ("Implats") reported a serious safety incident involving an elevator shaft, resulting in 13 employee deaths and 73 injured employees. The news resulted in a sharp decline in share price, which Dimensional's Investment Stewardship group identified through its ongoing news monitoring processes.

Dimensional contacted Implats to better understand the company's current risk management and internal safety control systems and to seek to understand if there was sufficient risk oversight by the board. The company informed Dimensional of board-approved operational policies, which includes routine checks by technicians. The company's board will seek to enhance operational safety based on observations and findings from the regulated investigations. The company also noted the recent disclosures they had made surrounding the incident, including information about the internal investigation, overseen by the board, being conducted in parallel with a formal investigation by South Africa's Department of Mineral Resources and Energy. The company expects the internal investigation to draw on observations and findings from the regulatory investigation but will also explore potential interventions to further enhance the safe operation of all conveyance systems across the company.

It appeared to Dimensional that the board had adequate oversight of this issue, promptly disclosed relevant information to the public, and that the company was taking actions toward risk oversight. Dimensional will review the board's approach to labour safety and their remedial actions as they publish updated documents. Dimensional's Investment Stewardship Group conveyed the engagement outcome with Implats to Dimensional's Portfolio Management team for further monitoring.

HSBC

UK Energy Company

The company is one of the largest energy companies globally, engaged in exploration and trading of oil and gas. HSBC Asset Management has engaged with the company for a number of years, both through the Climate Action 100+ initiative and on a one-to-one basis. In 2021, the company made a commitment to becoming a net-zero emissions business by 2050. It also committed to reducing carbon intensity of the energy products it sells (scope 3) by 20% by 2030, 45% by 2035 and 100% by 2050 compared to 2016. Later in the year, the company set a target to achieve its scope 1 and 2 absolute emissions by 50% by 2030. The company did not have a medium-term target to reduce absolute scope 3 emissions, which made it difficult us to assess the company's alignment with the goals of the Paris Agreement, in particular the1.5 degree pathway.

After the 2022 AGM, HSBC explained to the company reasons why they supported a climate shareholder proposal. The company disagreed with the proposal, arguing that a reduction in scope 3 emissions would mean the company would need to sell marketing business and that energy transition needs to be driven by the demand side. HSBC discussed the matter with the chair in a meeting in Q3. He argued that setting such a target would not be in the interest of shareholders as any reduction in oil and gas products would be replaced by those produced by others with a higher carbon footprint and likely to mean a return to coal. HSBC continued the discussion in Q1 2024 and again with the chair in a 1:1 meeting ahead of the AGM where they questioned the recent updates to its decarbonisation targets.

HSBC have engaged with the remuneration committee chair and suggested increasing the link between absolute emissions reduction and LTIP, and more recently improvements to the score card on health and safety.

In March 2024, the company published a target to reduce emissions from the use of its oil products by 15-20% by 2030 compared with 2021. While this in small part meets HBSC's request for absolute scope 3 emissions, HSBC do not believe this is sufficiently stretching or meaningful as the company has not set a similar target for gas products, while its growth strategy is focused on expansion of LNG. At the same time, the company removed the 2035 target to reduce the carbon intensity of its products, whilst also weakening the 2030 target to 15-20% compared with 2016.

Columbia Threadneedle

Reliance Industries Ltd

Reliance Industries is an Indian conglomerate with businesses ranging from the exploration and production of oil and gas to the manufacture of petroleum products, polyester products, polyester intermediates, plastics, polymer intermediates, chemicals, synthetic textiles and fabrics. The company faces concerns from investors regarding its corporate governance practices and climate change strategy. Ahead of the AGM, Columbia Threadneedle engaged with the company to address these issues, focusing on board independence and its approach to achieving net zero emissions.

Columbia Threadneedle highlighted concerns about the independence of two directors who have material equity interests in Reliance's subsidiaries and a professional legal consultant relationship with the company. Columbia Threadneedle expressed their expectation that the company should consider improving board independence during board refreshment and succession planning. Additionally, Columbia Threadneedle discussed Reliance's net zero strategy, which centres around a 2035 net zero target for scope 1 and 2 emissions. While its target is ambitious, Reliance's disclosures around the underlying strategy are opaque, lacking visibility over the relative contribution of identified decarbonization levers and roadmaps for execution. Columbia Threadneedle were encouraged to learn that Reliance does have bottom-up assessments internally covering the short term, which are critical for investment and execution. However, Columbia Threadneedle raised concerns over expectations of a near-term increase in emissions combined with a lack of certainty over plans in the medium term. Columbia Threadneedle also raised concerns about the lack of progress in measuring and disclosing scope 3 emissions, with only one subsidiary currently disclosing this. Management confirmed their desire to increase scope 3 coverage to other subsidiaries but plans still appear slow and lacking in ambition in Columbia Threadneedle's view.

Reliance acknowledged Columbia Threadneedle's concerns and provided some clarifications. The company stated that it is confident in meeting its 2035 net zero target but acknowledged the need for improved disclosure on its decarbonization roadmap. Management also fielded Columbia Threadneedle's concerns over governance practices and board independence. On this basis, Columbia Threadneedle will continue to monitor Reliance's progress for evidence of improvements and look to engage with the company further should progress be lacking.