

Quadron Services Limited Pension & Life Assurance Scheme

Engagement policy implementation statement for the year ended 5 April 2025

During the year ended 5 April 2025, the Scheme's investment policies were implemented in line with the principles set out in the Scheme's Statement of Investment Principles.

Compliance with the Statement of Investment Principles (SIP) over the year

The most recent SIP in place during the year was adopted in December 2024. There have been no other significant changes in investment policy during the Scheme Year.

Governance

Investment Objectives

Defined benefit (DB) section

The investment objectives for the DB section of the Scheme are:

- (a) The acquisition of suitable assets which will generate income and capital growth to meet, together with contributions from the Employer, the cost of benefits which the Scheme provides as set out in the Trust Deed and Rules;
- (b) So far as reasonably possible, to avoid the risk of the assets failing to meet the liabilities on an ongoing basis; and
- (c) To minimise the long-term costs of the Scheme by maximising the return on the assets so far as is both prudent and consistent with the above objectives.

Defined contribution (DC) section

The investment objectives for the DC section of the Scheme are:

- (a) To provide a default investment strategy that is suitable for meeting members', and their beneficiaries', investment objectives;
- (b) To avoid unnecessary risk; and
- (c) To minimise the costs and charges of the underlying funds where possible.

The Trustee has agreed to appoint a number of investment managers, utilising a variety of assets.

Strategic Asset Allocation

DB Section

The Trustee has agreed to allocate the Scheme's DB assets in the following proportions:

Fund	Allocation
Legal & General All World Equity Index Fund - GBP Currency Hedged	10.25%
Legal & General All World Equity Index Fund	10.25%
Legal & General Multi-Asset Fund	21.50%
Legal & General Diversified Fund	13.75%
BNY Mellon Newton Real Return Fund	13.75%
Legal & General Absolute Return Bond Plus Fund	12.00%
Legal & General Fixed Short & Long Matching Core Funds (LDI)	4.00%
Legal & General Real Short & Long Matching Core Funds (LDI)	14.50%

The Trustee aims to achieve a 90% inflation risk hedge and 90% interest rate hedge on the Scheme's liabilities through investment in Liability Driven Investment ("LDI") funds. The final asset allocations may need adjustment to achieve the desired hedge.

After investing in the Legal and General Matching Core LDI funds, the remaining assets will be invested in the Legal & General All World Equity Index Fund - GBP Currency Hedged, Legal & General All World Equity Index Fund, Legal & General Multi-Asset Fund, Legal & General Diversified Fund, BNY Mellon Newton Real Return Fund and the Legal & General Absolute Return Bond Plus Fund with a target ratio of: 10.25 : 10.25 : 21.50 : 13.75 : 13.75 : 12.00.

The funds are to be held on an investment platform provided by Mobius Life Limited.

The Trustee believes that the assets are invested in a manner appropriate to the nature and duration of the expected future retirement benefits payable under the Scheme.

The Scheme's investments will be kept under regular review.

The Trustee considers that the distribution of the funds represents a suitable asset allocation benchmark for the Scheme. The Trustee considers that this policy represents investment in suitable assets, is appropriately diversified, and provides a reasonable expectation of meeting the above objectives.

DC Section

The default investment strategy for the DC section of the Scheme is to invest the members' money purchase funds in proportion to the asset allocation of the DB section.

Expected Return on Investments

The investment strategy was developed by considering the Trustee's appetite for risk, in consultation with the Employer. The investment strategy was chosen to achieve a required return over gilts, based on the expected return on asset classes, within the appetite for risk as measured by the likely range of potential outcomes. In the Trustee's opinion, the chosen strategy offers an acceptable trade-off between risk and return.

Over the long-term, it is expected that the Scheme's investment returns will exceed the return required to fund the Scheme's Technical Provisions.

Realisation of Investments

The Trustee's policy is to hold investments that are sufficiently liquid so as to ensure that all benefit payments and other outgoings can be paid on time. The Trustee acknowledges that not every single investment needs to be highly liquid, so long as the portfolio as a whole has a sufficient level of liquidity. The liquidity of the Scheme's investments shall be reviewed regularly.

Environmental, Social and Corporate Governance ("ESG") Matters

The Trustee's overarching responsibility is to deliver financially sustainable returns for an acceptable level of risk to meet the future pension benefits of the members and in a way that Employer contributions paid into the Scheme are as stable and affordable as possible.

The Trustee has a duty to act in the financial interests of the Scheme's beneficiaries as a long-term investor. This includes considering ESG risks and opportunities that may be financially material to the Scheme.

The Trustee invests in pooled funds and the underlying assets are subject to the investment manager's own policies on ESG considerations, including climate change. The Trustee undertakes due diligence when appointing investment managers and review each of those managers' policies on ESG considerations. The Trustee appreciates that those investment managers which integrate ESG considerations can help mitigate risks and have the potential to lead to better, long-term financial outcomes.

The appointed investment managers have opted to sign the United Nations-supported Principles for Responsible Investment ("PRI"). As signatories to the PRI, the investment managers have made the

following commitments:

As institutional investors, we have a duty to act in the best long-term interests of our beneficiaries. In this fiduciary role, we believe that environmental, social, and corporate governance (ESG) issues can affect the performance of investment portfolios (to varying degrees across companies, sectors, regions, asset classes and through time).

We also recognise that applying these Principles may better align investors with broader objectives of society. Therefore, where consistent with our fiduciary responsibilities, we commit to the following:

Principle 1: We will incorporate ESG issues into investment analysis and decision-making processes.

Principle 2: We will be active owners and incorporate ESG issues into our ownership policies and practices.

Principle 3: We will seek appropriate disclosure on ESG issues by the entities in which we invest.

Principle 4: We will promote acceptance and implementation of the Principles within the investment industry.

Principle 5: We will work together to enhance our effectiveness in implementing the Principles.

Principle 6: We will each report on our activities and progress towards implementing the Principles.

The investment managers' reports related to PRI and their statements on compliance with the Financial Reporting Council (FRC) Stewardship Code, which is seen as the UK standard for good stewardship, are reviewed by the Trustee at least once every three years.

Additional Voluntary Contribution arrangements

The Scheme has provided a facility for members to pay additional voluntary contributions (AVCs) to enhance their benefits at retirement. The Trustee's objective was to provide vehicles that enabled members to generate suitable long-term returns, consistent with their reasonable expectations.

In the past AVCs were paid to Prudential Assurance Company Limited (Prudential) to enhance benefits at retirement. The Trustee selected these vehicles as they were believed to meet the Trustee's objective of providing investment options that enabled AVC members to generate suitable long-term returns.

The Trustee keeps the suitability and performance of these investments under review.

Voting behaviour

(i) LGIM

LGIM's Investment Stewardship team uses ISS's 'Proxy Exchange' electronic voting platform to electronically vote on clients' shares. All voting decisions are made by LGIM and they do not outsource any part of the strategic decisions. To ensure their proxy provider votes in accordance with their position on ESG, they have put in place a custom voting policy with specific voting instructions. These instructions apply to all markets globally and seek to uphold what they consider are minimum best practice standards which they believe all companies globally should observe, irrespective of local regulation or practice.

Their use of ISS recommendations is purely to augment their own research and proprietary ESG assessment tools. The Investment Stewardship team also uses the research reports of Institutional Voting Information Services (IVIS) to supplement the research reports that they receive from ISS for UK companies when making specific voting decisions.

LGIM's voting and engagement activities are driven by ESG professionals and their assessment of the requirements in these areas seeks to achieve the best outcome for all their clients. Their voting policies are reviewed annually and take into account feedback from their clients.

Every year, LGIM holds a stakeholder roundtable event where clients and other stakeholders (civil society, academia, the private sector and fellow investors) are invited to express their views directly to the members of the Investment Stewardship team. The views expressed by attendees during this event form a key consideration as they continue to develop their voting and engagement policies and define strategic priorities in the years ahead. They also take into account client feedback received at regular meetings and/or ad-hoc comments or enquiries.

All decisions are made by LGIM's Investment Stewardship team and in accordance with their relevant Corporate Governance & Responsible Investment and Conflicts of Interest policy documents which are reviewed annually. Each member of the team is allocated a specific sector globally so that the voting is undertaken by the same individuals who engage with the relevant company. This ensures their stewardship approach flows smoothly throughout the engagement and voting process and that engagement is fully integrated into the vote decision process, therefore sending consistent messaging to companies.

They retain the ability in all markets to override any vote decisions, which are based on their custom voting policy. This may happen where engagement with a specific company has provided additional information (for example from direct engagement, or explanation in the annual report) that allows them to apply a qualitative overlay to their voting judgement. They have strict monitoring controls to ensure their votes are fully and effectively executed in accordance with their voting policies by their service provider. This includes a regular manual check of the votes input into the platform, and an electronic alert service to inform them of rejected votes which require further action.

It is vital that the proxy voting service are regularly monitored and LGIM do this through quarterly due diligence meetings with ISS. Representatives from a range of departments attend these meetings, including the client relationship manager, research manager and custom voting manager. The meetings have a standing agenda, which includes setting out their expectations, an analysis of any issues they have experienced when voting during the previous quarter, the quality of the ISS research delivered, general service level, personnel changes, the management of any potential conflicts of interest and a review of the effectiveness of the monitoring process and voting statistics. The meetings will also review any action points arising from the previous quarterly meeting.

LGIM has its own internal Risk Management System (RMS) to provide effective oversight of key processes. This includes LGIM's voting activities and related client reporting. If an item is not confirmed as completed on RMS, the issue is escalated to line managers and senior directors within the organisation. On a weekly basis, senior members of the Investment Stewardship team confirm on LGIM's internal RMS that votes have been cast correctly on the voting platform and record any issues experienced. This is then reviewed by the Director of Investment Stewardship who confirms the votes have been cast correctly on a monthly basis. Annually, as part of the formal RMS processes the Director of Investment Stewardship confirms that a formal review of LGIM's proxy provider has been conducted and that they have the capacity and competency to analyse proxy issues and make impartial recommendations.

(ii) BNY Mellon Fund

As an active manager, they are keen to ensure that the decisions surrounding the exercise of ownership rights are aligned with their investment thesis as well as with their clients' expectations.

Stewardship activities are fundamental to the investment solutions they provide to their clients. They believe the value of their clients' portfolios can be enhanced by the application of good stewardship. This is achieved by engagement with investee companies and through the considered exercise of voting rights. They consider the activities to be an integral and important part of their investment process. For this reason, they prefer to retain discretion in relation to exercising their clients' voting rights and have established policies and procedures to ensure the exercise of global voting rights. Their approach has been designed as an investment-led approach that is aligned with their wider investment activities. Their long-term approach to investing aligns well with their stewardship intentions by seeking to understand and influence the long-term sustainability of the investments and investment landscape and, ultimately, the long-term investment requirements for which their clients are seeking solutions and which are a key reason why they entrust the Newton Investment Management Group (Newton)* to manage their assets.

Identifying their clients' requirements and expectations is achieved at the outset of their relationship by way of initial discussions and formal provisions within investment management agreements. Regular meetings and ad-hoc requests from clients and their advisors provide them with additional insights. In addition, they often deliver presentations and training to clients on a variety of aspects of stewardship, which they believe helps support their expectations of their investment managers and also helps them to evolve their own position in relation to stewardship matters.

In a practical sense, their understanding of clients' stewardship expectations allows them to articulate clearly and explicitly in engagement meetings with companies the importance that the ultimate beneficiaries place on particular issues.

* The 'Newton Investment Management Group' (Newton) is used to collectively describe a group of affiliated companies that provide investment advisory services under the brand name 'Newton Investment Management'. Newton Investment Management Limited (NIM) is domiciled in the UK, and Newton Investment Management North America, LLC (NIMNA) is domiciled in the US. Both firms are indirect subsidiaries of The Bank of New York Mellon Corporation (BNY Mellon).

Newton has established overarching stewardship principles which guide their ultimate voting decision, based on guidance established by internationally recognized governance principles including the OECD Corporate Governance Principles, the ICGN Global Governance Principles, the UK Investment Association's Principles of Remuneration and the UK Corporate Governance Code, in addition to other local governance codes. All voting decisions are taken on a case-by-case basis, reflecting their

investment rationale, engagement activity and the company's approach to relevant codes, market practices and regulations. These are applied to the company's unique situation, while also taking into account any explanations offered for why the company has adopted a certain position or policy. It is only in the event that they recognise a material conflict of interest that they apply the vote recommendations of their third-party voting administrator.

Newton seeks to make proxy voting decisions that are in the best long-term financial interests of its clients and which seek to support investor value by promoting sound economic, environmental, social and governance policies, procedures and practices through the support of proposals that are consistent with the following four key objectives:

- To support the alignment of the interests of a company's management and board of directors with those of the company's investors;
- To promote the accountability of a company's management to its board of directors, as well as the accountability of the board of directors to the company's investors;
- To uphold the rights of a company's investors to effect change by voting on those matters submitted for approval; and
- To promote adequate disclosure about a company's business operations and financial performance in a timely manner.

In general, voting decisions are taken consistently across all Newton's clients that are invested in the same underlying company. This is in line with Newton's investment process that focuses on the long-term success of the investee company. Further, it is Newton's intention to exercise voting rights in all circumstances where it retains voting authority.

All voting opportunities are communicated to Newton by way of an electronic voting platform.

The Responsible Investment team reviews all resolutions for matters of concern. Any such contentious issues identified may be referred to the appropriate global fundamental equity analyst or portfolio manager for comment. Where an issue remains contentious, Newton may also decide to confer or engage with the company or other relevant stakeholders.

An electronic voting service is employed to submit voting decisions. Each voting decision is submitted via the electronic voting service by a member of the Responsible Investment team but can only be executed by way of an alternate member of the team approving the vote within the same system.

Members of certain BNY Mellon operations teams are responsible for administrative elements surrounding the exercise of voting rights by ensuring the right to exercise clients' votes is available and that these votes are exercised.

Where they plan to vote against management on an issue, they may seek to engage with the company on a best-effort basis and depending on the significance of their holding, to share their concerns and to provide an opportunity for their concerns to be allayed. In such situations, they only communicate their voting intentions ahead of the meeting direct to the company and not to third parties. In some cases, depending on the materiality of their holding and the issue of concern, they alert a company via email regarding an action they have taken at its annual general meeting (AGM) to explain their thought process. They may then hold a call with the board/investor relations teams to gain a better understanding of the situation and communicate further. This can often be in tandem with the global equity analyst.

Where Newton acts as a proxy for its clients, a conflict could arise between Newton (including BNY Mellon funds or affiliate funds), the investee company and/or a client when exercising voting rights. Newton has in place procedures for ensuring potential material conflicts of interests are mitigated, while its clients' voting rights are exercised in their best interests. Newton seeks to avoid potential material conflicts of interest through:

- I. the establishment of these proxy voting guidelines;
- II. the Responsible Investment team;
- III. internal oversight groups; and
- IV. the application of the proxy voting guidelines in an objective and consistent manner across client accounts, based on, as applicable, internal and external research and recommendations provided by third party proxy advisory services and without consideration of any Newton or BNY Mellon client relationship factors.

Where a potential material conflict of interest exists between Newton, BNY Mellon, the underlying

company and/or a client, the voting recommendations of an independent third-party proxy service provider will be applied.

A potential material conflict of interest could exist in the following situations, among others:

1. Where a shareholder meeting is convened by Newton's parent company, BNY Mellon;
2. Where a shareholder meeting is convened by a company for which the CEO of BNY Mellon serves as a Board Member;
3. Where a shareholder meeting is convened by a company that is a current client of BNY Mellon and contributed more than 5% of BNY Mellon's revenue as of the end of the last fiscal quarter;
4. Where a shareholder meeting involves an issue that is being publicly challenged or promoted (e.g., a proxy contest) by (i) a BNY Mellon Board member or (ii) a company for which a BNY Mellon Board member serves as Chairman of the Board of Directors, CEO, President, CFO or COO (or functional equivalent); and
5. Where a shareholder meeting is convened by a pooled vehicle with agenda items relating to services provided by (or fees paid to) a BNY Mellon affiliate (e.g., Investment Management Agreement, Custody Agreement, etc);
6. Where an employee, office or director of BNYM or one of its affiliated companies has a personal interest in the outcome of a particular proxy proposal); and
7. Where the proxy relates to a security where Newton has invested in two or more companies that are subject to the same merger or acquisition.

All instances where a potential material conflict of interest has been recognised and Newton engages its proxy voting service provider are reported separately in Newton's publicly available Responsible Investment Quarterly Reports.

Newton employees are required to identify any potential or actual conflicts of interest and take appropriate action to avoid or manage these and report them to Newton's Conflicts of Interest Committee for review, further information can be found in Newton's Conflicts of Interest Policy.

Significant votes for the Scheme during the year

Criteria of the investment managers

(i) LGIM

As regulation on vote reporting has recently evolved with the introduction of the concept of 'significant vote' by the EU Shareholder Rights Directive II, LGIM wants to ensure they continue to help their clients in fulfilling their reporting obligations. They also believe public transparency of their vote activity is critical for their clients and interested parties to hold them to account.

For many years, LGIM has regularly produced case studies and/ or summaries of LGIM's vote positions to clients for what they deemed were 'material votes'. They are evolving their approach in line with the new regulation and are committed to provide their clients access to 'significant vote' information.

In determining significant votes, LGIM's Investment Stewardship team takes into account the criteria provided by the Pensions & Lifetime Savings Association (PLSA) guidance. This includes but is not limited to:

- High profile vote which has such a degree of controversy that there is high client and/ or public scrutiny;
- Significant client interest for a vote: directly communicated by clients to the Investment Stewardship team at LGIM's annual Stakeholder roundtable event, or where they note a significant increase in requests from clients on a particular vote;
- Sanction vote as a result of a direct or collaborative engagement;
- Vote linked to an LGIM engagement campaign, in line with LGIM Investment Stewardship's 5-year ESG priority engagement themes.

They provide information on significant votes in the format of detailed case studies in their quarterly ESG impact report and annual active ownership publications.

The vote information is updated on a daily basis and with a lag of one day after a shareholder meeting is held. The rationale for all votes cast against management, including votes of support to shareholder resolutions is also provided.

(iii) BNY Mellon Fund

Newton's significant holdings universe is determined based on the proportion of shares of investee companies held, as well as the size of the investment based on its value above certain thresholds.

The significant votes will be drawn from this universe and are defined as votes that are likely to generate significant scrutiny from end clients or other stakeholders. They may relate to resolutions that receive a particularly high proportion of dissent from investors or involve a corporate transaction or resolutions raised by shareholders.

Voting statistics

The table below sets out the key statistics on the investment managers' voting eligibility and action over the Scheme year. This only covers the funds that invest in equities.

Statistic	Legal & General All World Equity Index Fund	Legal & General Absolute Return Bond Plus Fund	Legal & General Diversified Fund	Legal & General Multi-Asset Fund	BNY Mellon Real Return Fund
Number of equity holdings as at 31 March 2025	4163	1	7203	7087	64
Meetings eligible to vote at	6611	1	10796	10635	75
Resolutions eligible to vote on	63689	41	107020	105710	1075
Percentage of eligible resolutions voted on	99.82%	100%	99.77%	99.77%	99.3%
Votes with management	79.48%	100%	76.53%	76.61%	94.6%
Votes against management	18.99%	0%	22.37%	22.29%	5.4%
Votes abstained from	1.52%	0%	1.10%	1.10%	0%
Meetings where at least one vote was against	59.87%	0%	69.33%	69.25%	35%
Votes contrary to the recommendation of the proxy adviser (if applicable)	10.36%	0%	13.71%	13.82%	4.9%

The most significant votes for the Scheme during the year have been summarised in the tables on the following pages.

Legal & General All World Equity Index Fund – Most significant votes

Set out below are three responses selected from the above fund manager when asked: “Which 10 votes (as a minimum) during the reporting period do you consider to be most significant for the Scheme?”

	VOTE 1	VOTE 2	VOTE 3
Company name	Microsoft Corporation	Amazon.com, Inc.	Chevron Corporation
Date of vote	10/12/2024	22/05/2024	29/05/2024
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	3.891824	2.202585	0.387787
Summary of the resolution	Resolution 9: Report on AI Data Sourcing Accountability	Resolution 6: Report on Customer Due Diligence	Resolution 4: Report on Analyzing the Risks Arising from Voluntary Carbon-Reduction Commitments
How you voted	For	For	Against
Where you voted against management, did you communicate your intent to the company ahead of the vote?	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.

Rationale for the voting decision	Shareholder Resolution - Governance: A vote FOR this resolution is warranted as the company is facing increased legal and reputational risks related to copyright infringement associated with its data sourcing practices. While the company has strong disclosures on its approach to responsible AI and related risks, shareholders would benefit from greater attention to risks related to how the company uses third-party information to train its large language models	Shareholder Resolution Human Rights: A vote in favour is applied as enhanced transparency over material risks to human rights is key to understanding the company's functions and organisation. While the company has disclosed that they internally review these for some products and has utilised appropriate third parties to strengthen their policies in related areas, there remains a need for increased, especially publicly available, transparency on this topic.	Shareholder Resolution - Climate change: A vote against is applied as LGIM expects companies to be taking sufficient action on the key issue of climate change.
Outcome of the vote	Fail	N/A	N/A
Implications of the outcome eg were there any lessons learned and what likely future steps will you take in response to the outcome?	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.
On which criteria have you assessed this vote to be "most significant"?	High Profile meeting: This shareholder resolution is considered significant due to the relatively high level of support received.	Pre-declaration and High-Profile Meeting: This shareholder resolution is considered significant as one of the largest companies and employers not only within its sector but in the world, we believe that Amazon's approach to human capital management issues has the potential to drive improvements across both its industry and supply chain. LGIM voted in favour of this proposal last year and continue to support this request, as enhanced transparency over material risks to human rights is key to understanding the company's functions and organisation. While the company has disclosed that they internally review these for their products (RING doorbells and	Pre-declaration and High-Profile Meeting: This shareholder resolution is considered significant due to misleading proposals (shareholder resolutions brought with the aim of undermining positive environmental, social and governance behaviours) are a relatively recent phenomenon. Such proposals often appear to be supportive of, for example, the energy transition but, when considered in depth, are actually designed to promote anti-climate change views.

		Recognition) and has utilised appropriate third parties to strengthen their policies in related areas, there remains a need for increased, especially publicly available, transparency on this topic. Despite this, Amazon's coverage and reporting of risks falls short of our baseline expectations surrounding AI. In particular, we would welcome additional information on the internal education of AI and AI-related risks.	
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Legal & General All World Equity Index Fund – GBP Currency Hedged – Most significant votes

Set out below are three responses selected from the above fund manager when asked: “Which 10 votes (as a minimum) during the reporting period do you consider to be most significant for the Scheme?”

	VOTE 1	VOTE 2	VOTE 3
Company name	Exxon Mobil Corporation	Walmart Inc.	Nestle SA
Date of vote	09/05/2024	05/06/2024	18/04/2024
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	0.621033	0.351701	0.344320
Summary of the resolution	Resolution 4: Revisit Executive Pay Incentives for GHG Emission Reductions	Resolution 7: Establish a Company Compensation Policy of Paying a Living Wage.	Resolution 7: Report on Non-Financial Matters Regarding Sales of Healthier and Less Healthy Foods
How you voted	Against	For	For
Where you voted against management, did you communicate your intent to the company ahead of the vote?	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.

Rationale for the voting decision	Shareholder Resolution - Climate change: A vote against is applied as LGIM expects companies to be taking sufficient action on the key issue of climate change.	Shareholder resolution - Income Inequality: A vote in favour is applied as LGIM would encourage the company to establish a compensation policy that ensures employees earn a living wage. This is because paying a living wage may reduce the potential negative financial impacts that stem from low worker morale/poor health/absenteeism/presenteeism, high staff turnover etc.	Shareholder proposal "Health Nutrition: A vote FOR is applied. LGIM is one of the co-filers of this resolution. We call for more effective targets to increase the availability of healthier food choices for consumers. There is a clear link between poor diets and chronic health conditions such as obesity, heart disease and diabetes. These in turn may lead to increased healthcare costs and decreased productivity, both of which we believe will have negative impacts on the economy. As the largest food company in the world we believe Nestle sets an example for the rest of the industry in terms of driving positive change and raising market standards.
Outcome of the vote	N/A	N/A	N/A
Implications of the outcome eg were there any lessons learned and what likely future steps will you take in response to the outcome?	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.
On which criteria have you assessed this vote to be "most significant"?	Pre-declaration and High-Profile Meeting: This shareholder resolution is considered significant due to misleading proposals (shareholder resolutions brought with the aim of undermining positive environmental, social and governance behaviours) are a relatively recent phenomenon. Such proposals often appear to be supportive of, for example, the energy transition but, when considered in depth, are actually designed to promote anti-climate change views.	Pre-declaration and High-Profile Meeting: This shareholder resolution is considered significant as LGIM has been engaging with Walmart on the topic of living wages for several years, and in 2023 we launched our income inequality engagement campaign which targeted 15 of the largest global food retailers asking them to set out their policy on living wages for workers within their own operations and their supply chain. Walmart, as the largest food retailer in the world, is part of this campaign. While the company	Pre-declaration and High-Profile Meeting: This shareholder resolution is considered significant due to nutrition being an important topic for investors because it has a significant impact on the health and well-being of individuals, communities and societies. The interconnected challenges of obesity, undernutrition and micronutrient deficiencies is estimated to be 5% of global income, or \$3.5 trillion, per annum. Nutrition is therefore one of our global stewardship sub-themes, under the umbrella of Health.

		has improved on some areas of our requests in terms of training opportunities, the company does not have a policy on the living wage, and its minimum wage of \$14 per hour for store employees is much less than the living wage, which is around \$25 per hour.	
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Legal & General Diversified Fund – Most significant votes

Set out below are three responses selected from the above fund manager when asked: “Which 10 votes (as a minimum) during the reporting period do you consider to be most significant for the Scheme?”

	VOTE 1	VOTE 2	VOTE 3
Company name	Shell Plc	National Grid Plc	Unilever Plc
Date of vote	21/05/2024	10/07/2024	01/05/2024
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	0.325008	0.226130	0.180756
Summary of the resolution	Resolution 22: Approve the Shell Energy Transition Strategy	Resolution 17: Approve Climate Transition Plan	Resolution 4: Approve Climate Transition Action Plan
How you voted	Against	For	For

Where you voted against management, did you communicate your intent to the company ahead of the vote?	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.
Rationale for the voting decision	Climate change: A vote against is applied. We acknowledge the substantive progress the company has made in respect of climate related disclosure over recent years, and we view positively the commitments made to reduce emissions from operated assets and oil products, the strong position taken on tackling methane emissions, as well as the pledge of not pursuing frontier exploration activities beyond 2025. Nevertheless, in light of the revisions made to the Net Carbon Intensity (NCI) targets, coupled with the ambition to grow its gas and LNG business this decade, we expect the company to better demonstrate how these plans are consistent with an orderly transition to net-zero emissions by 2050. In essence, we seek more clarity regarding the expected lifespan of the assets Shell is looking to further develop, the level of flexibility in revising production levels against a range of scenarios and tangible actions taken across the value chain to deliver customer decarbonisation. Additionally, we would benefit from further transparency regarding lobbying activities in regions where hydrocarbon production is expected to play a significant role, guidance on capex allocated to low carbon beyond 2025 and the application of responsible divestment principles involved in asset sales, given	Climate Change: LGIM is voting in favour of the National Grid Climate Transition plan. We commend the company's efforts in committing to net-zero emissions across all scopes by 2050 and setting 1.5C-aligned near term science based targets. We also appreciate the clarity provided in the 'Delivering for 2035 report' and look forward to seeing the results of National Grid's engagement with SBTi regarding the decarbonisation of heating.	Climate change: A vote FOR the CTAP is applied as we understand it to meet LGIM's minimum expectations. This includes the disclosure of scope 1, 2 and material scope 3 GHG emissions and short, medium and long-term GHG emissions reduction targets consistent with a 1.5°C Paris goal. Despite the SBTi recently removing their approval of the company long-term scope 3 target, we note that the company has recently submitted near term 1.5 degree aligned scope 3 targets to the SBTi for validation and therefore at this stage believe the company's ambition level to be adequate. We therefore remain supportive of the net zero trajectory of the company at this stage.

	portfolio changes form a material lever in Shell's decarbonization strategy.		
Outcome of the vote	Pass	Pass	Pass
Implications of the outcome eg were there any lessons learned and what likely future steps will you take in response to the outcome?	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.
On which criteria have you assessed this vote to be "most significant"?	Thematic - Climate: LGIM is publicly supportive of so called "Say on Climate" votes. We expect transition plans put forward by companies to be both ambitious and credibly aligned to a 1.5C scenario. Given the high-profile nature of such votes, LGIM deem such votes to be significant, particularly when LGIM votes against the transition plan.	Thematic - Climate: LGIM is publicly supportive of so called "Say on Climate" votes. We expect transition plans put forward by companies to be both ambitious and credibly aligned to a 1.5C scenario. Given the high-profile nature of such votes, LGIM deem such votes to be significant, particularly when LGIM votes against the transition plan.	Thematic - Climate: LGIM is publicly supportive of so called "Say on Climate" votes. We expect transition plans put forward by companies to be both ambitious and credibly aligned to a 1.5C scenario. Given the high-profile nature of such votes, LGIM deem such votes to be significant, particularly when LGIM votes against the transition plan.

Legal & General Multi-Asset Fund – Most significant votes

Set out below are three responses selected from the above fund manager when asked: "Which 10 votes (as a minimum) during the reporting period do you consider to be most significant for the Scheme?"

	VOTE 1	VOTE 2	VOTE 3
Company name	Nestle SA	Glencore Plc	Canadian Pacific Kansas City Limited

Date of vote	18/04/2024	29/05/2024	24/04/2024
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	0.219054	0.142062	0.140641
Summary of the resolution	Resolution 7: Report on Non-Financial Matters Regarding Sales of Healthier and Less Healthy Foods	Resolution 12: Approve 2024-2026 Climate Action Transition Plan	Resolution 3: Management Advisory Vote on Climate Change
How you voted	For	Against	For
Where you voted against management, did you communicate your intent to the company ahead of the vote?	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.
Rationale for the voting decision	Shareholder proposal “ Health Nutrition: A vote FOR is applied. LGIM is one of the co-filers of this resolution. We call for more effective targets to increase the availability of healthier food choices for consumers. There is a clear link between poor diets and chronic health conditions such as obesity, heart disease and diabetes. These in turn may lead to increased healthcare costs and decreased productivity, both of which we believe will have negative impacts on the economy. As the largest food company in the world we believe Nestle sets an example for the rest of the industry in terms of driving positive change and raising market	Climate Change: A vote against is applied as LGIM expects companies to introduce credible transition plans, consistent with the Paris goals of limiting the global average temperature increase to 1.5Å°C. While we note the progress the company has made in terms of disclosure, we remain concerned over the company's thermal coal activities, as it remains unclear how the planned thermal coal production aligns with global demand for thermal coal under a 1.5Å°C scenario.	Climate change: A vote FOR is applied as LGIM expects companies to introduce credible transition plans, consistent with the Paris goals of limiting the global average temperature increase to 1.5Å°C. This includes the disclosure of scope 1, 2 and material scope 3 GHG emissions and short-, medium- and long-term GHG emissions reduction targets consistent with the 1.5Å°C goal. As CPKC set targets validated by Science Based Target initiative, we welcome the company's efforts to reduce its GHG emissions and expects to see a clear transition plan.

	standards.		
Outcome of the vote	N/A	Pass	Pass
Implications of the outcome eg were there any lessons learned and what likely future steps will you take in response to the outcome?	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.
On which criteria have you assessed this vote to be "most significant"?	Pre-declaration and High-Profile Meeting: This shareholder resolution is considered significant due to nutrition being an important topic for investors because it has a significant impact on the health and well-being of individuals, communities and societies. The interconnected challenges of obesity, undernutrition and micronutrient deficiencies is estimated to be 5% of global income, or \$3.5 trillion, per annum. Nutrition is therefore one of our global stewardship sub-themes, under the umbrella of Health.	Thematic - Climate: LGIM is publicly supportive of so called "Say on Climate" votes. We expect transition plans put forward by companies to be both ambitious and credibly aligned to a 1.5C scenario. Given the high-profile nature of such votes, LGIM deem such votes to be significant, particularly when LGIM votes against the transition plan.	Thematic - Climate: LGIM is publicly supportive of so called "Say on Climate" votes. We expect transition plans put forward by companies to be both ambitious and credibly aligned to a 1.5C scenario. Given the high-profile nature of such votes, LGIM deem such votes to be significant, particularly when LGIM votes against the transition plan.

Legal & General Absolute Return Bond Plus Fund – Most significant votes

Set out below the only one response provided by the above fund manager when asked: "Which 10 votes (as a minimum) during the reporting period do you consider to be most significant for the Scheme?"

	VOTE 1
Company name	Atos SE
Date of vote	31/01/2025
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	0.007094
Summary of the resolution	Resolution 9: Ratify Appointment of Philippe Salle as Director
How you voted	Against
Where you voted against management, did you communicate your intent to the company ahead of the vote?	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.
Rationale for the voting decision	Joint Chair/CEO: A vote against is applied as LGIM expects the roles of Board Chair and CEO to be separate and not to be recombined once separated. These two roles are substantially different and a division of responsibilities ensures there is a proper balance of authority and responsibility on the board.
Outcome of the vote	N/A

Implications of the outcome eg were there any lessons learned and what likely future steps will you take in response to the outcome?	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.
On which criteria have you assessed this vote to be "most significant"?	Thematic - Board Leadership: LGIM considers this vote to be significant as it is in application of an escalation of our vote policy on the topic of the combination of the board chair and CEO.

BNY Mellon Real Return Fund – Most significant votes

Set out below are three responses selected from the above fund manager when asked: “Which 10 votes (as a minimum) during the reporting period do you consider to be most significant for the Scheme?”

	VOTE 1	VOTE 2	VOTE 3
Company name	AstraZeneca PLC	Amazon.com, Inc.	The Goldman Sachs Group, Inc.
Date of vote	11/04/2024	22/05/2024	24/04/2024
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	1.01%	1.39%	0.90%
Summary of the resolution	Approve Remuneration Report	Commission a Third Party Audit on Working Conditions	Report on Pay Equity
How you voted	FOR	FOR	FOR
Where you voted against management, did you communicate your intent to the company ahead of the vote?	N/A	N/A	No
Rationale for the voting decision	We decided to support the CEO pay package based on the CEO's proven track record of creating significant value for shareholders and turning around a company once considered beyond recovery. For many years, he has been	We voted for the shareholder proposal requesting a third-party audit on working conditions as we do consider it to add value for shareholders at this stage.	We supported a shareholder proposal asking for a report on pay equity as the requested adjusted and unadjusted median pay gap statistics may allow shareholders to evaluate and measure the company's progress towards reducing pay inequities

	compensated below global peers in the industry, despite his accomplishments, and has also hinted at possibly leaving previously. At this juncture, where execution is critical, we want to avoid any potential disruptions that a change in leadership might bring. Our decision to support CEO pay aligns with our broader investment case for AZ, as we believe under Pascal's leadership, the company is well-positioned to continue executing on its strategic initiatives and delivering value to shareholders.		more fully.
Outcome of the vote	95.3% For	31% FOR	29.8% FOR
Implications of the outcome eg were there any lessons learned and what likely future steps will you take in response to the outcome?	The level of support behind this vote signifies shareholder confidence in executive leadership at this juncture. It also brings the company closer to global peers regarding executive pay. We will continue to monitor performance to ensure it aligns with our interests as shareholders.	We consider the issue of working conditions material to the company, and the conclusion of an audit would help the board understand potential shortcomings and respond adequately to shareholder concerns. Moreover, this will support our engagement efforts with the company.	We deemed this vote to be significant as, in our view, the requested adjusted and unadjusted median pay gap statistics should help us measure the company's progress towards reducing pay inequities in detail. This proposal should also help us assess if pay inequity on top of unequal access to opportunity, might be one of the reasons that we have seen recent departures of senior women leaders from the bank. We will continue to highlight our stance on this issue through our voting action.

On which criteria have you assessed this vote to be "most significant"?	We deem this vote as significant due to its strategic importance, impact on shareholder value, risk of leadership disruption, industry benchmarking, and strong shareholder support. It aligns with our investment case, emphasizing the need to retain and compensate effective leadership.	The issue of working conditions is a material risk to understand and reign in for the company. It is also an engagement topic.	We determined this vote as significant owing to the rarity of a shareholder proposal receiving significant support.
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