Appendix 1: Implementation Statement

This Statement provides information which is required to be disclosed in line with the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013, as subsequently amended, including amendments to transpose the EU Shareholder Rights Directive (SRD II) into UK law. It confirms how the investment principles, objectives and policies of the Trustee's Statement of Investment Principles (**SIP**) dated March 2023 and September 2025 have been implemented over the Scheme year.

It also includes the Trustee's voting and engagement policies, as well as details of any review of the SIP during the year, subsequent changes made with the reasons for the changes (if any). A description of the voting behaviour during the year, either by or on behalf of the Trustee, or if a proxy voter was used, is also included within this Implementation Statement.

This Implementation Statement covers the period 1 January 2025 to 31 December 2025.

Investment objectives of the Scheme

Funding objective

The primary funding objective of the Scheme is to ensure, as far as possible, that there are sufficient assets to provide benefits to the Scheme members as and when these fall due.

Investment objectives

The Trustee's high-level objectives with regard to investing the Scheme's assets are to:

- achieve a return which is sufficient, over the longer term, to meet the funding objective; and
- adopt an approach that recognises the need to balance risk with the achievement of a satisfactory investment return.

Performance objectives

The investment managers have each been set performance objectives to achieve returns in line with, or in excess of, a benchmark.

Stewardship policy

The Trustee's stewardship policy, as set out in the SIP is as follows.

> The Trustee believes that in order to protect and enhance the value of the investments, over the time horizon over which the benefits are paid, it must act as a responsible asset owner. The Trustee's voting and engagement policy is to use their investments to improve the Environmental, Social and Governance (**ESG**) behaviours of the underlying investee companies. These ESG topics encompass a range of priorities, which may over time include climate change, biodiversity, the remuneration and composition of company boards, as well as poor working practices. The Trustee believes that having this policy and aiming to improve how companies behave in the medium and long term are in the members' best interests. The Trustee will aim to monitor the actions taken by the investment managers on their behalf and if there are significant differences from the policy detailed above, they will escalate their concerns which could ultimately lead to disinvesting their assets from the manager.

Review of the SIP

The Scheme reviewed the investment strategy and chose to redeem the Aberdeen Global Private Markets Fund holding in November 2025 and to reinvest the proceeds into the L&G Diversified Fund. However, the proceeds of the redemption were received during quarter 1 2026, after the Scheme year end, meaning the Scheme was still invested in the Aberdeen Global Private Markets Fund at year end.

The Trustee most recently reviewed the SIP in September 2025. It was updated following a review of the Scheme's investment strategy and to reflect the changes made to the Scheme's ESG and engagement and voting rights policies.

Appendix 1: Implementation Statement (continued)

Investment managers and funds in use

To align with the Scheme's investment objectives, the Trustee has implemented the strategic asset allocation outlined in the table below:

Asset Class	Investment Manager	Fund	Target Asset Allocation
Global Equities	L&G	Future World Global Equity Index Fund (GBP Hedged)	62.0%
Private Markets	Aberdeen	Global Private Markets Fund*	
Multi-Asset	L&G	Diversified Fund	
Corporate Bonds	L&G	Future World GBP Corporate Bond Index Fund	
Liability Driven Investment	L&G	Matching Core Real Long Fund	38.0%
Liquidity	L&G	Sterling Liquidity Fund	
Total			**100.0%**

*Zero strategic allocation, although assets remained at Scheme year-end.

Investment governance

The Trustee is responsible for making investment decisions and seeking advice as appropriate from Broadstone Corporate Benefits Limited (**Broadstone**), as the Trustee's investment consultant.

The Trustee does not actively obtain views of the membership of the Scheme to help form their policies set out in the SIP as the Scheme is comprised of a diverse membership, which the Trustee expect to hold a broad range of views on ethical, political, social, environmental, and quality of life issues.

The Trustee has put in place strategic objectives for Broadstone, as the Trustee's investment consultant, as required by the Investment Consultancy and Fiduciary Management Market Investigation Order 2019 and now the Pensions Regulator.

There were no changes to these objectives when they were reviewed in September 2024. The Trustee is due to formally review these objectives by September 2027 or earlier.

In addition, the Trustee regularly reviews the performance of their investment adviser. The last review was undertaken in January 2026.

The investment arrangements of the Scheme are reviewed by the Trustee on a regular basis, with the assistance of Broadstone.

Appendix 1: Implementation Statement (continued)

Requirement	Policy	Implementation of Policy
Financially and Non-Financially Material Considerations	The Trustee recognises that Environmental, Social and Governance (ESG) issues can and will have a material impact on the companies, governments and other organisations that issue or otherwise support the assets in which the Scheme invests. In turn, ESG issues can be expected to have a material financial impact on the returns provided by those assets. The Trustee delegates day-to-day decisions on the selection of investments to the Investment Managers. The ESG policies remain with the Trustee. The Trustee has an expectation that the Investment Managers will consider ESG issues in selecting investments or will otherwise engage with the issuers of the Scheme's underlying holdings on such matters in a way that is expected to improve the long-term return on the associated assets. The Trustee does not currently impose any specific restrictions on the Investment Managers regarding ESG issues but will review this position from time to time. The Trustee receives information on request from the Investment Managers on their approach to selecting investments and engaging with issuers with reference to ESG issues. Regarding the specific risk to the performance of the Scheme's investments associated with the impact of climate change, the Trustee takes the view that this falls within their general approach to ESG issues. The Trustee regards the potential impact of climate change on the Scheme's assets as a longer-term risk. The Trustee will continue to monitor market developments in this area with their Investment Consultant. Where ESG factors are non-financial (i.e. they do not pose a risk to the prospect of the financial success of the investment) the Trustee believes these should not drive investment decisions. The Trustee expects the Investment Managers, when exercising discretion in investment decision making, to consider non-financial factors only when all other financial factors have been considered and in such a circumstance the consideration of non-financial factors should not lead to a reduction in the efficiency of the investment.	No deviation from this policy since inception in September 2025. No deviation from the previous policy up to September 2025.
Voting Rights and Engagement	The Trustee's voting and engagement policy is to use their investments to improve the Environmental, Social and Governance behaviours of the underlying investee companies. These ESG topics encompass a range of priorities, which may over time include climate change, biodiversity, the remuneration and composition of company boards, as well as poor working practices. The Trustee believes that having this policy and aiming to improve how companies behave in the medium and long term are in the members' best interests. The Trustee will aim to monitor the actions taken by the Investment Managers on their behalf and if there are significant differences from the policy detailed above, they will escalate their concerns which could ultimately lead to disinvesting their assets from the Manager.	No deviation from this policy since inception in September 2025. No deviation from the previous policy up to September 2025.
Capital Structure of Underlying Companies	Responsibility for monitoring the capital structure of investee companies is delegated to the Investment Managers. The Trustee expects the extent to which the Investment Managers monitor capital structure to be appropriate to the nature of the mandate.	No deviation from this policy since inception in September 2025. No deviation from the previous policy up to September 2025.

Appendix 1: Implementation Statement (continued)

Financially and non-financially material considerations

The Trustee notes that the way financially material ESG factors will be taken into account in an investment strategy or pooled fund offering will depend on the underlying asset classes within the pooled fund offering and the management style (e.g. active or passive).

The Trustee is satisfied that the funds which the Scheme currently invests in are managed in line with their views on financially material considerations, as set out below, and in particular with regards to the selection, retention, and realisation of the underlying investments held.

This position is monitored periodically. As part of the monitoring process, the Trustee has access to updates on governance and engagement activities by their investment managers, and input from their investment advisors on ESG matters. These views are also taken into account when appointing and reviewing an investment manager.

The Trustee acknowledges that they are delegating the consideration of financially material factors in relation to determining the underlying holdings to their investment managers, given they are investing in pooled funds.

The Trustee invests across a range of asset classes and styles. The Trustee expects the investment managers to take into account ESG considerations by engaging with the underlying companies and where relevant, by exercising voting rights on these companies.

A summary of the Trustee's views for each of the Scheme's asset classes is outlined below:

Asset Class	Actively or Passively Managed?	Comments
Global Equities	Passive	The Trustee acknowledges that the investment manager must invest in line with specified indices and, therefore, may not be able to disinvest from a particular security if they have concerns relating to ESG. The Trustee does expect the investment manager to take into account ESG considerations by engaging with companies that form the index, and by exercising voting rights on these companies.
Private Markets	Active	The Trustee expects the investment manager to take financially material ESG factors into account, given the unconstrained and active management style of the fund and the ability of the manager to use its discretion to generate higher risk adjusted returns. Given the nature of the asset class, the Trustee also expects its investment manager to engage heavily with the underlying investee companies.
Multi-Asset	Active	The Trustees expect the investment manager to take financially material ESG factors into account, given the active management style of the fund and the ability of the investment manager to use its discretion to generate higher risk adjusted returns. The Trustees also expect the investment manager, to engage with the underlying investee companies, where possible, although they appreciate that fixed income assets within the portfolio do not typically attract voting rights.
Corporate Bonds	Passive	The Trustee acknowledges that the investment manager must invest in line with specified indices and, therefore, may not be able to disinvest from a particular security if they have concerns relating to ESG. The Trustee does expect its investment manager to engage with investee companies, where possible, although they appreciate that fixed income assets do not typically attract voting rights.
Liability Driven Investments (LDI)	Active	The underlying assets of the LDI solution consist of government bond funds and derivative contracts, with no underlying investee companies as such. Therefore, the Trustee believes there is less scope for the consideration of ESG issues to improve risk-adjusted returns in this asset class because of the nature of the securities.
Cash	Active	The Trustees believe there is less scope for the consideration of ESG issues to improve risk-adjusted returns in this asset class because of the nature of the securities.

Appendix 1: Implementation Statement (continued)

Voting rights and engagement activities

The Trustee currently invests in pooled investment funds with the investment managers, and they acknowledge that this limits their ability to directly influence the investment managers. All voting activities have been delegated to the investment managers, as the Trustee does not have any administrative mechanism to cast a vote in line with their views on the underlying holdings, given the pooled nature of the Scheme's investments. The Trustee's stewardship policy is detailed at the start of this document although this has not been shared with the investment managers to influence what they believe to be the most significant votes.

A summary of the votes made by the investment managers during the Scheme year on behalf of the Trustee (where the investment owns equities) is provided in the table below. The analysis is based on information available from L&G.

			Total Resolutions Voted:		
Manager	Fund	Resolutions voted on	For	Against	Abstained
L&G	Future World Global Equity Index Fund (GBP Hedged)	59,824	79%	20%	1%
L&G	Diversified Fund*	100,619	76%	23%	1%

*Scheme inception date for this fund was 24 November 2025.

L&G uses ISS's 'ProxyExchange' electronic voting platform for proxy voting services.

Significant votes

The Trustee has requested details of the significant votes made on its behalf by the investment manager. In determining significant votes, the investment manager will take 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 annual Stakeholder roundtable event, or where we 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 engagement campaign, in line with Investment Stewardship's 5-year ESG priority engagement themes.

The Trustee believes that the most significant vote detailed above aligns with the Scheme's stewardship priorities detailed at the start of this document.

SIGNIFICANT VOTE – L&G	
Company	**Mastercard Incorporated**
Date	24 June 2025
% of portfolio invested in firm	0.78% of the L&G Future World Global Equity Index Fund (GBP Hedged)
Resolution	Resolution 7: Oversee and Report on a Racial Equity Audit
Why significant	Thematic - Diversity: L&G's Asset Management business views diversity as a financially material issue for our clients, with implications for the assets we manage on their behalf.
How voted	**VOTED FOR (against management recommendation)**
Manager Comments	*"Shareholder Resolution Diversity: A vote in favour is applied as we support such information and risk management approach to Diversity. L&G's Asset Management business will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress."*
Vote outcome	Fail

Appendix 1: Implementation Statement (continued)

Significant votes (continued)

SIGNIFICANT VOTE – L&G	
Company	Dyno Label Limited
Date	17 December 2025
% of portfolio invested in firm	0.004% of the L&G Diversified Fund
Resolution	Resolution 7: Approve Progress on Climate Change Transition
Why significant	Thematic - Climate: L&G 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, L&G deem such votes to be significant, particularly when L&G votes against the transition plan.
How voted	**VOTED AGAINST (against management recommendation)**
Manager Comments	*"Climate change: We recognise the progress that the company has made in its transition plan, including improved disclosure of its operational GHG transition pathway and the introduction of scope 3 targets. However, L&G Asset Management requires short-, medium- and long-term targets aligned to a 1.5C trajectory and covering all scopes of emissions. Dyno Nobel does not currently meet this criteria, nor does it disclose capex linked to its climate transition plan. As a result, we will be voting against this resolution. L&G will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress."*
Vote outcome	Pass

The Trustee believes that the most significant vote detailed above aligns with the Scheme's stewardship priorities detailed at the start of this document.

Engagement activities

The notable engagement activities of the Investment Managers over the last 12 months is provided below:

- **L&G** met with Xcel Energy, amongst other US utilities, on a number of occasions to discuss the topics US utilities are facing pressure on. These include changes to coal retirement legislation, tax credit changes, customer affordability, and increasing wildfire frequency. L&G met with Xcel Energy's CEO and Head of IR for their most recent meeting in May 2025. The topics discussed included the company's recent results, changes to their tax credits, affordability, the coal executive order, and wildfires. On affordability, L&G see it as crucial that the US utilities keep bill rises under control in order to reduce regulatory pressure on allowed returns. L&G believe maintaining affordability will permit companies to satisfy their capital expenditure plans for the future and enable them to decarbonise the grid. L&G will be continuing engagement with the US utilities, including Xcel Energy.
- **Aberdeen** engaged with Iberdrola in March 2025 on a group conference call to discuss various topics including biodiversity, human rights in solar supply chain and network investments. Aberdeen has been engaging with the company since 2020 establishing milestones to strengthen climate ambition, biodiversity strategy, and supply-chain protections. Over the 2020-2025 cycle, the company delivered several key commitments, including publishing a biodiversity policy and strategy in 2021 and setting a target in 2022 to be net positive for biodiversity by 2030. Aberdeen were also pleased to hear during the March 2025 engagement the progress being made against milestones Aberdeen had set in this area. The company also showed how they are making considerable efforts to ensure its solar supply chain is protected against the risk of forced labour. Aberdeen believe the engagement objectives are being achieved and that their most recent analysis of the company reaffirmed their view that Iberdrola is an international leader in the utilities sector.

Appendix 1: Implementation Statement (continued)

Engagement activities (continued)

Signatories to the UNPRI (United Nations Principles for Responsible Investment) will receive an overall score which represents how well ESG metrics are incorporated into managers' investment processes. The investment managers submit a transparency report on their processes across different categories which is then assessed by the UNPRI and graded in a formal report.

UNPRI Assessment Report scores are presented as a 'star' rating ranging from ★ to ★★★★★, with more stars representing a higher score.

The latest available UNPRI scores of the Investment Managers are outlined in the table below:

Manager	UNPRI Score
L&G	★★★★★
Aberdeen	★★★★★
Median	★★★

The Trustee also considers the investment manager's policies on stewardship and engagement when selecting and reviewing an investment manager.

Monitoring of investment arrangements

In addition to any reviews of the investment managers or approaches, and direct engagement with the investment managers (as detailed above), the Trustee receives performance reports on a quarterly basis from Broadstone to ensure the investment objectives set out in their SIP are being met.

Signed: Jonathan Hazlett **Date:** 22/07/2026

For and on behalf of Open Trustees Limited independent trustee of the CWU 2000 Pension Scheme