

The Crown Estate Pension Scheme – Implementation Statement 2025

1. Purpose

This Implementation Statement reports on how, and the extent to which, the policies as set out in the Scheme's Statement of Investment Principles ("SIP") have been complied with during the year ended 31 March 2025. In preparing this statement, the DB section has been reviewed with respect to voting and stewardship policies, conflicts of interest and engagement. The DC section has been reviewed with respect to the whole SIP and the relevant procedures.

Both sections include the exercise of rights (including voting) and other engagement activities undertaken in respect of the Scheme's investments. The Statement also provides a summary of the voting behaviour and most significant votes cast during the reporting year.

2. Background

Under the regulation now in force, Trustees of Occupational Pension Schemes are required to state their policy on the exercise of the rights attaching to investments, and on undertaking engagement activities in respect of investments. Trustees are also required to report on how and the extent to which they have followed this policy and on significant votes.

This Statement has been produced in accordance with: the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013; the Pension Protection Fund (Pensionable Service) and Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018; and the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019, as amended; and guidance published by the UK government and the UK Pensions Regulator.

This Statement has been prepared by the Trustees, with the assistance of their Investment Adviser (Quantum Advisory).

References herein to the actions, review work or determinations of the Trustees refer to activity that has been carried out by either the Trustees or the Investment Adviser on the Trustees' behalf.

3. Executive summary

Over the Scheme year, the Trustees:

Through their investment Adviser, reviewed the voting and engagement activity of the funds that invest in equities. The Trustees are generally content that the Scheme's investment managers have appropriately carried out their stewardship duties.

Are of the opinion that they have complied with the relevant policies and procedures as identified in the SIP.

Have remained aware of the relevant policies and procedures as identified in the SIP and received input from their Investment Adviser to aid ongoing compliance.

Reviewed the Scheme's investment strategy and, as a result, the allocation to matching assets was increased, and an allocation to cashflow matching assets was introduced. Additionally, the Trustees will be implementing an allocation to hedge funds in order to provide further returns diversification.

The voting activities for funds that do not hold equities have not been reviewed as part of this exercise, as the Trustees believe there is less scope to influence the practices within such arrangements. However, the general stewardship practices of non-equity managers have been reviewed to ensure that they engage with their investments.

4. Reviews of the SIP over the Scheme year

The SIP was last reviewed in September 2024. During the year the Trustees instigated a review of the Scheme's investment strategy. This review will be completed post the reporting period, and the SIP is to be updated as part of this process.

The Trustees confirm that the review will ensure that the SIP is in line with regulation and that any amendments to investment policy resulting from the review of investment strategy are reflected. The Trustees will seek written advice from the Investment Adviser on the SIP and the suitability of the investments and will also consult with the Sponsoring Employer.

5. Investment Manager's voting policies, stewardship policies and activity

Trustees' voting and stewardship policies

The Trustees consider how stewardship factors are integrated into the investment processes when: (i) appointing new investment managers and funds; and (ii) monitoring existing investment managers and funds.

The Trustees are unable to direct how votes are exercised and have not used a proxy voting services provider over the year. The Trustees have given the investment managers full discretion concerning voting and engagement decisions. As part of this exercise, the Trustees have reviewed the voting activities and stewardship policies of the funds.

The Trustees have not specified any stewardship priorities beyond those implicit in the investment mandates of the funds selected. The Trustees will monitor the investment managers' stewardship policies and assess whether they have appropriately carried out their duties. Should the voting activities and stewardship policies of an invested fund not be deemed appropriate, the Trustees will escalate these concerns with the relevant investment manager and if necessary, review the Scheme's position within the fund.

In the meantime, the Trustees will consider implementing revised measures as part of a review of stewardship responsibilities, among other stewardship monitoring methods under consideration.

Over the Scheme year, the voting activities of the following funds have been reviewed:

- BlackRock Aquila Life Balanced Fund
- Schroder Life Sustainable Future Multi-Asset Fund
- Legal & General Asset Management ("L&G") Dynamic Diversified Fund
- L&G FTSE4Good UK Equity Index Fund

- L&G Future World Global Equity Index Fund
- L&G Future World Fund
- L&G Global Equity Fixed Weights (50:50) Index Fund
- L&G Retirement Income Multi-Asset Fund
- L&G UK Equity Index Fund
- L&G World (Ex. UK) Equity Index Fund
- HSBC Islamic Global Equity Index Fund
- Partners Generations Fund

In addition to this, the general stewardship policies of the above funds and the funds listed below have also been reviewed:

- L&G AAA-AA-A Corporate Bond All Stocks Index Fund
- L&G Global Unconstrained Bond Fund
- L&G All Stocks Gilts Index Fund
- L&G Cash
- L&G Future World Annuity Aware Fund
- L&G Managed Property
- L&G Matching Core Funds
- L&G Maturing Buy & Maintain Credit 2025-2029
- L&G Single Stock Gilt (incl. Green Gilt) and Index Linked Gilt Funds
- L&G Sterling Liquidity & Sterling Liquidity Plus

Manager's voting and stewardship policies and procedures

Details of the managers voting and stewardship policies can be found in Appendix 1. The extent to which the investment managers make use of any proxy advisory and voting services was reviewed. The Trustees are satisfied with the voting and policies/procedures of the investment managers.

Voting statistics

The table below sets out the key statistics on voting eligibility and action over the year.

	BlackRock Aquila Life Balanced Fund	HSBC Islamic Global Equity Index Fund	L&G Dynamic Diversified Fund	L&G FTSE4Good UK Equity Index	L&G Future World Global Equity Index Fund	L&G Future World Fund
Number of equity holdings	12,651	99	7,027	216	3,197	1,280
Meetings eligible to vote at	2,648	105	10,106	257	5,515	1,696
Resolutions eligible to vote on	34,894	1,719	102,057	4,434	55,096	21,789
Proportion of eligible resolutions voted on (%)	98.5	96.2	99.8	100.0	99.8	99.6
Votes with management (%)	95.3	78.5	76.7	94.4	81.0	80.4
Votes against management (%)	4.7	21.5	22.5	5.6	17.9	19.3
Votes abstained from (%)	0.3	<0.1	0.8	0.0	1.1	0.3
Meetings where at least one vote was against management (%)	24.2	78.1	70.9	39.3	58.6	70.6
Votes contrary to the recommendation of the proxy adviser (%)	0.2	1.8	14.0	4.9	9.7	14.9

Source: Investment managers

	L&G Global Equity Fixed Weights (50:50) Index Fund	L&G Retirement Income Multi Asset Fund	L&G UK Equity Index	L&G World (ex. UK) Equity Index Fund	Partners Generations Fund ¹	Schroder Life Sustainable Future Multi-Asset Fund
Number of equity holdings	2,885	7,217	501	2,703	>50	N/A ²
Meetings eligible to vote at	2,981	10,425	717	2,810	68	727
Resolutions eligible to vote on	37,792	105,590	10,134	33,434	905	8,959
Proportion of eligible resolutions voted on (%)	99.8	99.8	100.0	99.7	100.0	95.9
Votes with managemen t (%)	81.8	77.2	93.8	77.9	91.0	88.7
Votes against managemen t (%)	18.0	22.0	6.2	21.8	5.0	11.3
Votes abstained from (%)	0.3	0.8	0.0	0.3	4.0	0.3
Meetings where at least one vote was against managemen t (%)	69.0	70.1	42.5	76.0	18.0	55.6
Votes contrary to the recommend ation of the proxy adviser (%)	13.0	13.7	5.3	15.4	3.0	10.3

Source: : Investment managers. ¹Produces PLSA data biannually, therefore the data shown is to December 2024. ²At the date of this report, this information is unavailable .

The Trustees are generally satisfied with the voting activity that has been undertaken within the funds during the Scheme year .

Significant votes over the reporting year

The Trustees have, through their Investment Adviser, reviewed the significant votes cast by the Investment Managers and are generally satisfied with their voting behaviour. The Trustees are mindful of the link between the Scheme's stewardship priorities and voting behaviour. A cross section of the most significant votes cast is contained in Appendix 2.

6. Conflicts of interest

This section considers whether the Investment Managers are affected by the following conflicts of interest, and how these are managed .

1. The asset management firm overall having an apparent client-relationship conflict e.g. the manager provides significant products or services to a company in which they also have an equity or bond holding;
2. Senior staff at the asset management firm holding roles (e.g. as a member of the Board) at a company in which the asset management firm has equity or bond holdings;
3. The asset management firm's stewardship staff having a personal relationship with relevant individuals (e.g. on the Board or the company secretariat) at a company in which the firm has an equity or bond holding;
4. A situation where the interests of different clients diverge. An example of this could be a takeover, where one set of clients is exposed to the target and another set is exposed to the acquirer; and
5. Differences between the stewardship policies of managers and their clients.

L&G

L&G have refrained from directly commenting on which of the conflicts of interest, detailed above, they are impacted by within the selected funds. In place of providing a direct response, L&G refer the Trustees to their conflicts of interest policy, which includes several examples and how these might be managed.

This is available here: https://www.L&G.com/landg-assets/L&G/_document-library/capabilities/L&G-conflicts-of-interest.pdf

The Investment Adviser, on behalf of the Trustees, has also received a copy of the conflicts of interest policy.

Partners Group

With regards to Partners' listed exposure, to the best of their knowledge, they are not affected by points 1, 3, 4 and 5. With regards to point 3, Partners Group's role as a private markets investor, with the primary approach of taking ownership stakes in various assets, it is common practice for senior members of the relevant investment teams to hold positions such as board seats. Partners group see this as extending their stewardship activities, where investment teams represent Partners Group and their clients who have entrusted them with managing their assets, playing a key role as an active owner. Quantum Advisory deemed that this is appropriate for this asset class and the Trustees are satisfied with their conclusion.

Schroders

Schroders accepts that conflicts of interest arise in the normal course of business. They have a documented Group wide policy, covering such occasions, to which all employees are expected to adhere, on which they receive training and which is reviewed annually. There are also supplementary local policies that apply the Group policy in a local context. More specifically, conflicts or perceived conflicts of interest can arise when voting on motions at company meetings which require further guidance on how they are handled. Schroders' Corporate Governance specialists are responsible for monitoring and identifying situations that could give rise to a conflict of interest when voting in company meetings. They are guided by Schroders' conflicts of interest policy and processes. Where Schroders itself has a conflict of interest with the fund, the client, or the company being voted on, they will follow the voting recommendations of a third party (which will be the supplier of their proxy voting processing and research service). Examples of conflicts of interest include (but are not limited to):

- Where the company being voted on is a client of Schroders,
- Where the Schroders employee making the voting decision is a director of, significant shareholder of or has a position of influence at the company being voted on;
- Where Schroders or an affiliate is a shareholder of the company being voted on;
- Where there is a conflict of interest between one client and another;
- Where the director of a company being voted on is also a director of Schroders plc;
- Where Schroders plc is the company being voted on

Separation of processes and management between Schroder Investment Management and Wealth Management divisions helps to ensure that individuals who are clients or have a business relationship with the latter are not able to influence corporate governance decisions made by the former.

If Schroders believes it should override the recommendations of the third party in the interests of the fund/client and vote in a way that may also benefit, or be perceived to benefit, its own interests, then Schroders will obtain the approval of the decision from the Schroders' Global Head of Equities with the rationale of such vote being recorded in writing. If the third-party recommendation is unavailable, they will vote as they see is in the interests of the client. If however, this vote is in a way that might benefit, or be perceived to benefit, Schroders' interests, they will obtain approval and record the rationale in the same way as described above.

In the situation where a fund holds investments on more than one side of the transaction being voted on, Schroders will always act in the interests of the specific fund. There may also be instances where different funds, managed by the same or different fund managers, hold securities on either side of a transaction. In these cases, the fund managers will vote in the best interest of their specific funds.

Where Schroders has a conflict of interest that is identified, it is recorded in writing, whether or not it results in an override by the CIO of Equities.

BlackRock

BlackRock did not confirm whether they were affected by any of the conflicts at the time of producing this statement, but referred to the BlackRock Investment Stewardship policies and procedures:

<https://www.blackrock.com/corporate/literature/publication/blk-statement-conflicts-of-interest.pdf>

HSBC

HSBC Funds and client mandates may hold shares in their parent HSBC Holdings PLC. They have a special procedure for voting these shares to manage this conflict. HSBC also have procedures for managing other conflicts that may arise. However, they do not believe they have exposure to the conflicts listed.

7. Implementation of policies contained within the Scheme's SIP – DC sections

This part of the statement sets out the various policies within the Scheme's SIP and the actions that the Trustees have undertaken in respect of them over the Scheme year .

SIP policy	Comments
1. Investment processes and governance	
<u>Investment Strategy</u> The Trustees, in consultation with their Investment Adviser, set the investment strategy for the Scheme's DC section. The primary objective of the DC section is to provide, on a DC basis, benefits for members on their retirement or benefits for their dependants on death before retirement. The Trustees have sought to provide members with appropriate investment choices. The Trustees select investment funds which are appropriate to implement the investment strategy. The Trustees have also selected a range of funds from which members may self-select. This range is intentionally diverse but not considered by the Trustees to be unduly so. It is the policy of the Trustees, after taking appropriate written advice from their Investment Adviser, and in consultation with the Sponsoring Employer, to set the investment strategy for the Scheme, following a consideration of their objectives and other related matters. The Trustees review their objectives and investments at regular intervals and amend them accordingly. The Trustees have signed the appropriate policy documents, agreements and application forms with Mobius Life Limited.	<u>Investment Strategy</u> The Trustees considered each investment manager and fund prior to appointment and have received advice from their Investment Adviser on their appropriateness as part of such considerations. There were no changes to the investment strategy over the Scheme year.

SIP policy	Comments
<u>Performance monitoring</u> The Trustees monitor the performance of the Scheme’s DC investments on a frequent basis. They also review the continued appropriateness of the targeted retirement outcome at appropriate frequencies. Written advice is received as required from the Investment Adviser. The Trustees have agreed the appropriateness of the benchmarks, performance objectives and the various controls adopted by the incumbent investment managers in managing each fund in which members can invest. <u>Conflict of Interest</u> The Trustees consider any potential and actual conflicts of interest (subject to reasonable levels of materiality) at the start of each Trustees' meeting and document these in the minutes. <u>Charges</u> The Trustees consider the fees and charges associated with each investment before investing. The Trustees will compare the annual turnover and associated costs for each fund with previous years to ensure each investment manager’s process and philosophy remain consistent. <u>Statement of Investment Principles</u> The Trustees review the SIP periodically for good governance and to ensure their policies remain appropriate and are being adhered to. The Trustees may also review the SIP following specific events, so as to ensure its ongoing appropriateness. Reviews of the SIP will occur no less frequently than every three years, and without delay after any significant change in investment policy.	<u>Performance monitoring</u> The Trustees review the performance of the Scheme’s DC investments on a quarterly basis through the investment monitoring reports provided to them by the Investment Adviser. The Trustees keep the appointment of all investment managers under review and will seek to replace any managers, or funds, which no longer remain appropriate to implement the Scheme’s investment strategy. <u>Conflicts of interest</u> The Trustees continued to document any known material conflicts of interest at each Trustees’ meeting. <u>Charges</u> The Trustees receive an annual Chairs’ Statement which contains information on charges and other costs the Scheme has incurred over the year. <u>Statement of Investment Principles</u> The Trustees review and update the SIP on a periodic basis. The SIP was last reviewed, and subsequently updated, during September 2024 to comply with requirements for the SIP to contain a policy on illiquid investments.

SIP policy	Comments
2. Responsible Investment	
<u>Financially material considerations</u> The Trustees acknowledge the potential impact upon the Scheme’s investments and members arising from financially material matters. The Trustees define these as including, but not limited to ESG matters. With specific regard to ESG factors, the Trustees consider how these are integrated into the investment processes when: (i) appointing new investment managers and funds; and (ii) monitoring existing investment managers and funds. The Trustees have provided the appointed investment managers with full discretion concerning the evaluation of ESG factors when making investment decisions. Representatives of the investment managers may attend Trustees’ meetings, at a frequency determined by the Trustees, to present on various matters including their ESG policies. The Trustees also periodically consider publicly available ESG related publications pertaining to the incumbent investment managers. The Trustees consider ESG factors when determining future strategy decisions. <u>Stewardship</u> The Trustees consider how stewardship factors are integrated into the investment processes when: (i) appointing new investment managers and funds; and (ii) reviewing existing investment managers and funds. The Trustees have provided the appointed investment managers with full discretion concerning the stewardship of their investments. <u>Non-financial matters</u> The Trustees do not consider non-financial factors and do not employ a formal policy in relation to this when selecting, retaining and realising investments. However, where members have been forthcoming with their views, the Trustees may consider these when setting investment strategy.	<u>Financially material considerations</u> L&G, Partners Group, HSBC, Schroders and Blackrock are all signatories to the United Nations Principles for Responsible Investment (“UNPRI”). ESG factors were considered as part of the DC investment review. The Trustees did not formally review the investment managers’ publicly available ESG reporting over the year, however they did receive updates on the investment managers’ stewardship activities as part of the preparation of this Statement. The voting activity of the Scheme’s investment managers is discussed in section 5 of this statement. <u>Stewardship</u> The Trustees, with help from its Investment Adviser, have reviewed the stewardship reports prepared by the investment managers. The Trustees did not have any immediate concerns around the votes cast. Further details are provided in the section 5 and Appendix 2 of this statement. <u>Non-financial matters</u> The Trustees are not aware of any specific requests/views expressed by member over the year.

SIP policy	Comments
3. Risk management	
The Trustees have identified a range of risks and documented these within the SIP. The Trustees seek to minimise them as far as possible and inform this process by regularly monitoring the investment funds.	The Trustees reviewed the performance of the Scheme’s investments during the course of their formal meetings, through quarterly investment monitoring reports and advice provided by the Investment Adviser. The Trustees are generally content with the performance delivered.

Appendix 1 – investment manager voting policies and procedures

L&G

L&G have a proven track-record of being active owners; striving to use their scale to ensure that the companies in which they invest are acting responsibly and markets / regulators create an environment in which good management of ESG factors are valued and supported.

L&G's Investment Stewardship team make all voting decisions, in accordance with L&G's 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.

L&G's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by L&G and strategic decisions are not outsourced. The use of ISS recommendations is purely to augment L&G's own research and proprietary ESG assessment tools. The Investment Stewardship team also uses the research reports of IVIS to supplement the research reports that are received from ISS for UK companies when making specific voting decisions.

To ensure the proxy provider votes in accordance with L&G's position on ESG, L&G have put in place a custom voting policy with specific voting instructions. These instructions apply to all markets globally and seek to uphold what L&G consider are minimum best practice standards which L&G believe all companies globally should observe, irrespective of local regulation or practice. L&G retain the ability in all markets to override any voting decisions, which are based on their custom voting policy. This may happen where engagement with a specific company has provided additional information that allows L&G to apply a qualitative overlay to their voting judgement. L&G 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.

Partners Group voting policies and process

Where Partners Group's client accounts contain listed equity securities in dedicated programs/allocation buckets ("Liquid Private Markets investments") and Partners Group has discretion to vote on a proxy stemming from such securities (a "Proxy Request"), Partners Group will make a decision on such Proxy Requests to protect and promote the economic value of the securities held in such client accounts.

Proxy Requests related to Liquid Private Markets investments may be administered by third party service providers (currently, Glass Lewis). These service providers will follow Partners Group's Proxy Voting Directive in all instances. Should a voting recommendation by a service provider be against the recommendation by the respective company's management, Partners Group will vote manually on those proposals.

In certain circumstances, Partners Group receives Proxy Requests for publicly traded securities. When such Proxy Requests arise, the recipient, typically the respective investment team or Partners Group Guernsey serving as administrator, will forward it to be reviewed and evaluated by Transactions Services together with the relevant investment team and/or the relevant Investment Committee. Partners Group have a group form which seeks to ensure that all Proxy Requests, included in the broader term 'corporate actions', are reviewed and processed in a timely manner.

Schroders' voting policies and process

As active owners, Schroders recognise their responsibility to make considered use of voting rights. They therefore vote on all resolutions at all AGMs/EGMs globally unless restricted from doing so (e.g. as a result of share blocking).

Schroders aim to take a consistent approach to voting globally, subject to regulatory restrictions that is in line with their Proxy Voting Policy.

The overriding principle governing voting is to act in the best interests of clients. Where proposals are not consistent with the interests of shareholders and clients, Schroders will vote against resolutions. They may abstain where mitigating circumstances apply, for example where a company has taken steps to address shareholder issues.

Schroders evaluate voting resolutions arising at investee companies and, where they have the authority to do so, vote on them in line with fiduciary responsibilities in what are deemed to be the interests of clients. Corporate Governance specialists assess each proposal and consider a range of factors, including the circumstances of each company, long-term performance, governance, strategy and the local corporate governance code. Specialists will draw on external research, such as that provided by Glass Lewis, the Investment Association's Institutional Voting Information Services and public reporting. Schroders' own research is also integral to their process; this will be conducted by both financial and Sustainable Investment analysts. For contentious issues, Corporate Governance specialists consult with the relevant analysts and portfolio managers to seek their view and better understand the corporate context.

Schroders also engage with companies throughout the year via regular face-to-face meetings, written correspondence, emails, phone calls and discussions with company advisors and stakeholders.

BlackRock's voting policies and process

BlackRock have developed high-level principles ("BlackRock's Global Corporate Governance and Engagement Principles") which set the framework for their voting. These are publicly accessible on the BlackRock website.

Their voting guidelines are market specific, and consider a company's unique circumstances, where relevant. BlackRock inform their voting decision through research and engage as necessary. BlackRock determines which companies to engage directly based on their assessment of the materiality of the issue for sustainable long-term financial returns and the likelihood of their engagement being productive.

BlackRock's proxy voting process is led by the BlackRock Investment Stewardship team ("BIS"), which consists of three regional teams – Americas ("AMRS"), Asia-Pacific ("APAC"), and Europe, Middle East and Africa ("EMEA") – located in seven offices around the world. The analysts with each team will generally determine how to vote at the meetings of the companies they cover. Voting decisions are made by members of the BIS with input from investment colleagues as required, in each case, in accordance with BlackRock's Global Corporate Governance and Engagement Principles and market-specific guidelines.

While BlackRock subscribe to research from the proxy advisory firms ISS and Glass Lewis (also a voting proxy advisory firm), they do not follow any single proxy research firm's voting recommendations. BlackRock use several other inputs, including a company's own disclosures, and their record of past engagements, in their voting and engagement analysis.

Blackrock use ISS's electronic platform to execute their vote instructions, manage client accounts in relation to voting and facilitate client reporting on voting. In certain markets, they work with proxy research firms who apply their proxy voting guidelines to filter out routine or non-contentious proposals and refer to us any meetings where additional research and possibly engagement might be required to inform their voting decision.

HSBC voting policies and process

HSBC exercise their voting rights as an expression of stewardship for client assets. HSBC have global voting guidelines which protect investor interests and foster good practice, highlighting independent directors, remuneration linked to performance, limits on dilution of existing shareholders and opposition to poison pills.

HSBC use the leading voting research and platform provider Institutional Shareholder Services to assist with the global application of their voting guidelines. ISS reviews company meeting resolutions and provides recommendations highlighting resolutions which contravene their guidelines. HSBC review voting policy recommendations according to the scale of their overall holdings. The bulk of the holdings are voted in line with the recommendation based on their guidelines. These global voting guidelines inform the custom voting recommendations HSBC receive from their external proxy voting research and platform provider. The voting recommendations for active holdings are reviewed by the relevant fund managers, whilst their corporate governance specialists oversee voting for all holdings.

Appendix 2 – Most significant votes

The tables below set out a cross section of significant votes undertaken by the investment managers of the funds held by the Scheme. Information on further significant votes undertaken by the Scheme's investment managers has been reviewed.

Please note that, due to the 'common building block' structure of L&G's passive equity funds (including the L&G DDF which gains its equity exposure by investing in other L&G equity funds) there is a degree of overlap between the most significant votes cast within each fund. We have therefore sought to provide different examples within each fund that are of relevance.

Schroder Sustainable Future Multi-Asset Fund

Schroder does not currently have a process for identifying the most significant votes within the Fund. Instead, Schroder has provided a number of examples of votes that it deems to be significant. This has been challenged by the Trustees and Schroder has confirmed that it is working with various internal stakeholders to develop a process of best-practice and will update the Trustees in due course.

Generally, the most significant votes cast by Schroder tend to involve some form of material misalignment in relation to governance, ethics, ESG/Climate Change, or alignment of interest.

Company Name	Astrazeneca plc	General Motors Company
Date of Vote	April 2024	June 2024
Summary of the resolution	Elect Marcus Wallenberg as a director	Shareholder Proposal Regarding Additional Disclosure on Sustainability Risks Within the Supply Chain
Size of the holding (% of portfolio)	N/A1	N/A1
How the firm voted	Against	For
Was the vote against management and was this communicated beforehand?	Schroders may tell the company of their intention to vote against the recommendations of the board before voting, in particular if they are large shareholders or if they have an active engagement on the issue. Schroders always inform companies after voting against any of the board's recommendations.	Schroders may tell the company of their intention to vote against the recommendations of the board before voting, in particular if they are large shareholders or if they have an active engagement on the issue. Schroders always inform companies after voting against any of the board's recommendations.
On which criteria has the vote been deemed as 'significant'?	Schroder believe that all resolutions where they vote against the board's recommendations should be classified as a significant vote, for example, votes against the re-election of directors, on executive remuneration, on material changes to the business (such as capital structure or M&A), on climate matters and on other environmental or social issues may all be more or less significant to different client stakeholders	Schroder believe that all resolutions where they vote against the board's recommendations should be classified as a significant vote, for example, votes against the re-election of directors, on executive remuneration, on material changes to the business (such as capital structure or M&A), on climate matters and on other environmental or social issues may all be more or less significant to different client stakeholders

Outcome of the vote	N/A ¹	N/A ¹
Do the Trustees/ asset manager intend to escalate stewardship efforts?	N/A ¹	N/A ¹

Source: Investment Manager. Please note, information on the outcome of the votes was pending at the time of writing. ¹Schroders did not provide the size of the holding; nor the outcome or efforts to escalate the stewardship offers.

BlackRock Aquila Life Balanced Fund

BlackRock Investment Stewardship prioritises its work around themes that they believe will encourage sound governance practices and deliver sustainable long-term financial performance. These themes in turn shape their Global Principles, market-specific Voting Guidelines and Engagement Priorities, which form the benchmark against which they look at the sustainable long-term financial performance of investee companies.

BlackRock periodically publish “vote bulletins” setting out detailed explanations of key votes relating to governance, strategic and sustainability issues that it considers, based on its Global Principles and Engagement Priorities, material to a company’s sustainable long-term financial performance.

Company Name	Tesla, Inc.	Shell Plc
Date of Vote	June 2024	May 2024
Summary of the resolution	Elect Director James Murdoch	Advise Shell to Align its Medium-Term Emissions Reduction Targets Covering the Greenhouse Gas (GHG) Emissions of the Use of its Energy Products (Scope 3) with the Goal of the Paris Climate Agreement
Size of the holding (% of portfolio)	N/A1	N/A1
How the firm voted	Against	Against
Was the vote against management and was this communicated beforehand?	BlackRock endeavour to communicate to companies when intending to vote against management, either before or just after casting votes in advance of the shareholder meeting.	
On which criteria has the vote been deemed as ‘significant’?	This vote is significant given the notoriety of the company and BlackRock’s decision to vote against due to concerns regarding the board’s decision-making process, independence, and ability to oversee management.	This vote is significant as it relates to environmental risk, which could be significant with such a high-profile asset. It pertains to the Scheme’s headline risk, which Trustees have raised concerns over.
Outcome of the vote	Pass	Fail
Do the Trustees/ asset manager intend to escalate stewardship efforts?	Where concerns are raised either through voting or during engagement, BlackRock monitor developments and assess whether the company has addressed their concerns	

Source: Investment Manager. ¹BlackRock did not provide the size of the holding.

Partners Group Generations Fund

Partners Group did not provide details of votes undertaken as a result of the listed equity holdings not constituting a large enough size of the fund. Private markets investments are the largest exposure within the fund and these are typically held directly, where Partners Group controls the board and therefore direction/strategy of the business. Therefore, Partners were able to provide examples of portfolio company's ESG efforts. Two examples are provided below.

Company Name	Ammega	International Schools Partnership
Summary of the company's efforts	Partners have guided AMMEGA in advancing its carbon reduction strategy, including major solar energy installations in Spain and China, which collectively generated over 1.5 million kWh of renewable energy in 2023. The company's Energy Conservation Task Force achieved a 10% reduction in energy use, reinforcing AMMEGA's commitment to operational efficiency and emission reductions. Additionally, efforts to expand ISO 14001 certification now cover 80% of locations, with a target of full certification by 2025. Future focus: Partners will continue to support AMMEGA in scaling its sustainability initiatives, further reducing carbon intensity, optimizing energy and water use, and deepening ESG integration to drive long-term value creation.	ISP's key achievements include the introduction of environmental education initiatives, allowing students to engage in sustainability-focused projects. Additionally, ISP has expanded its teacher development programs, ensuring the highest educational standards while promoting diversity, equity, and inclusion within its workforce. Future focus: Partners will continue supporting ISP in sustainability-focused facility improvements, decarbonization strategies for school operations, and enhancing digital learning platforms to provide greater educational access
Does the Trustee/ asset manager intend to escalate stewardship efforts?	Partners Group will continue to engage proactively with invested companies in relation to ESG factors.	Partners Group will continue to engage proactively with invested companies in relation to ESG factors.

Source: Partners Group

L&G

In determining significant votes, L&G's Investment Stewardship team considers 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 L&G's 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 L&G engagement campaign, in line with L&G Investment Stewardship's 5-year ESG priority engagement themes.

L&G Dynamic Diversified Fund

Company Name	Toyota Motor Corp	Unilever Plc
Date of Vote	June 2024	May 2024
Summary of the resolution	Elect Director Toyoda, Akio	Approve Climate Transition Action Plan
Size of the holding (% of portfolio)	0.2	0.3
How the firm voted	Against	For
Was the vote against management and was this communicated beforehand?	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is LGIM's policy not to engage with investee companies in the three weeks prior to an AGM as the 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 LGIM's policy not to engage with investee companies in the three weeks prior to an AGM as the engagement is not limited to shareholder meeting topics.
On which criteria has the vote been deemed as 'significant'?	L&G views gender diversity as a financially material issue for clients, with implications for the assets managed on their behalf. L&G also considers this vote to be significant as it is applied under the Climate Impact Pledge, their flagship engagement programme targeting companies in climate-critical sectors.	LGIM is publicly supportive of so called "Say on Climate" votes. They 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.
Outcome of the vote	N/A	Pass
Do the Trustees/ asset manager intend to escalate stewardship efforts?	LGIM will continue to engage with investee companies, publicly advocate their position on this issue, and monitor company and market-level progress.	LGIM will continue to engage with investee companies, publicly advocate their position on this issue, and monitor company and market-level progress.

Source: Investment Manager

L&G FTSE4Good UK Equity Index Fund

Company Name	SSE Plc	Rentokil Initial Plc
Date of Vote	July 2024	May 2024
Summary of the resolution	Approve Net Zero Transition Report	Re-elect Richard Solomons as Director
Size of the holding (% of portfolio)	1.1	0.6
How the firm voted	For	Against
Was the vote against management and was this communicated beforehand?	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to an AGM as the engagement is not limited to shareholder meeting topics.	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to an AGM as the engagement is not limited to shareholder meeting topics.
On which criteria has the vote been deemed as 'significant'?	L&G is publicly supportive of so called "Say on Climate" votes. They 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.	L&G views gender diversity as a financially material issue for clients, with implications for the assets managed on their behalf.
Outcome of the vote	Pass	Pass
Do the Trustees/ asset manager intend to escalate stewardship efforts?	L&G will continue to engage with investee companies, publicly advocate their position on this issue, and monitor company and market-level progress.	L&G will continue to engage with investee companies, publicly advocate their position on this issue, and monitor company and market-level progress.

Source: Investment Manager

L&G Future World Global Equity Index

Company Name	JPMorgan Chase & Co.	Broadcom Inc.
Date of Vote	May 2024	April 2024
Summary of the resolution	Elect Director Todd A. Combs	Elect Director Henry Samueli
Size of the holding (% of portfolio)	0.9	1.0
How the firm voted	Against	Against
Was the vote against management and was this communicated beforehand?	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to an AGM as the engagement is not limited to shareholder meeting topics.	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to an AGM as the engagement is not limited to shareholder meeting topics.
On which criteria has the vote been deemed as 'significant'?	L&G considers this vote to be significant as it is in application of an escalation of their vote policy on the topic of the combination of the board chair and CEO.	L&G considers this vote to be significant as it is applied under the Climate Impact Pledge, their flagship engagement programme targeting companies in climate-critical sectors.
Outcome of the vote	Pass	Pass
Does the trustee/ asset manager intend to escalate stewardship efforts?	L&G will continue to engage with investee companies, publicly advocate their position on this issue, and monitor company and market-level progress.	L&G will continue to engage with investee companies, publicly advocate their position on this issue, and monitor company and market-level progress.

Source: Investment Manager

L&G Future World Fund

Company Name	Cisco Systems, Inc.	Moody's Corporation
Date of Vote	December 2024	April 2024
Summary of the resolution	Elect Director Charles H. Robbins	Elect Director Leslie F. Seidman
Size of the holding (% of portfolio)	1.1	1.1
How the firm voted	Against	Against
Was the vote against management and was this communicated beforehand?	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to an AGM as the	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to an AGM as the

	engagement is not limited to shareholder meeting topics.	engagement is not limited to shareholder meeting topics.
On which criteria has the vote been deemed as 'significant'?	L&G considers this vote to be significant as it is in application of an escalation of their vote policy on the topic of the combination of the board chair and CEO.	L&G views gender diversity as a financially material issue for their clients, with implications for the assets managed on their behalf.
Outcome of the vote	Pass	N/A
Do the Trustees/ asset manager intend to escalate stewardship efforts?	L&G will continue to engage with investee companies, publicly advocate their position on this issue and monitor company and market-level progress.	L&G will continue to engage with investee companies, publicly advocate their position on this issue and monitor company and market-level progress.

Source: Investment Manager

L&G Global Equity Fixed Weights (50:50) Index Fund

Company Name	Glencore Plc	Nestle SA
Date of Vote	May 2024	April 2024
Summary of the resolution	Approve 2024-2026 Climate Action Transition Plan	Report on Non-Financial Matters Regarding Sales of Healthier and Less Healthy Foods
Size of the holding (% of portfolio)	1.2	0.5
How the firm voted	Against	For
Was the vote against management and was this communicated beforehand?	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to an AGM as the engagement is not limited to shareholder meeting topics.	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to an AGM as the engagement is not limited to shareholder meeting topics.
On which criteria has the vote been deemed as 'significant'?	L&G is publicly supportive of so called "Say on Climate" votes. They 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.	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 L&G's global stewardship sub-

		themes, under the umbrella of Health.
Outcome of the vote	Pass	N/A
Do the Trustees/ asset manager intend to escalate stewardship efforts?	L&G will continue to engage with investee companies, publicly advocate their position on this issue and monitor company and market-level progress.	L&G will continue to engage with investee companies, publicly advocate their position on this issue and monitor company and market-level progress.

Source: Investment Manager

L&G Retirement Income Multi-Asset Fund

Company Name	National Grid Plc	NextEra Energy, Inc.
Date of Vote	July 2024	May 2024
Summary of the resolution	Approve Climate Transition Plan	Elect Director John W. Ketchum
Size of the holding (% of portfolio)	0.2	0.2
How the firm voted	For	Against
Was the vote against management and was this communicated beforehand?	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to an AGM as the engagement is not limited to shareholder meeting topics.	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to an AGM as the engagement is not limited to shareholder meeting topics.
On which criteria has the vote been deemed as 'significant'?	L&G is publicly supportive of so called "Say on Climate" votes. They 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.	L&G considers this vote to be significant as it is in application of an escalation of their vote policy on the topic of the combination of the board chair and CEO.
Outcome of the vote	Pass	N/A
Do the Trustees/ asset manager intend to escalate stewardship efforts?	L&G will continue to engage with investee companies, publicly advocate their position on this issue, and monitor company and market-level progress.	L&G will continue to engage with investee companies, publicly advocate their position on this issue, and monitor company and market-level progress.

Source: Investment Manager

L&G UK Equity Index Fund

Company Name	Intertek Group Plc	London Stock Exchange Group plc
Date of Vote	May 2024	April 2024
Summary of the resolution	Re-elect Andrew Martin as Director	Approve Remuneration Policy
Size of the holding (% of portfolio)	0.3	1.9
How the firm voted	Against	For
Was the vote against management and was this communicated beforehand?	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to an AGM as the engagement is not limited to shareholder meeting topics.	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to an AGM as the engagement is not limited to shareholder meeting topics.
On which criteria has the vote been deemed as 'significant'?	L&G views gender diversity as a financially material issue for their clients, with implications for the assets managed on their behalf.	This resolution is considered significant as L&G overrode their custom vote policy on the basis of the engagement that they had with the company.
Outcome of the vote	Pass	Pass
Do the Trustees/ asset manager intend to escalate stewardship efforts?	L&G will continue to engage with investee companies, publicly advocate their position on this issue, and monitor company and market-level progress.	L&G will continue to engage with investee companies, publicly advocate their position on this issue, and monitor company and market-level progress.

Source: Investment Manager

L&G World (ex. UK) Equity Index Fund

Company Name	Eli Lilly and Company	Berkshire Hathaway Inc.
Date of Vote	May 2024	May 2024
Summary of the resolution	Elect Director Jamere Jackson	Elect Director Warren E. Buffett
Size of the holding (% of portfolio)	1.0	0.8
How the firm voted	Against	Against
Was the vote against management and was this communicated beforehand?	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to an AGM as the engagement is not limited to shareholder meeting topics.	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to an AGM as the engagement is not limited to shareholder meeting topics.
On which criteria has the vote been deemed as 'significant'?	L&G considers this vote to be significant as it is in application	L&G considers this vote to be significant as it is in application

	of an escalation of their vote policy on the topic of the combination of the board chair and CEO.	of an escalation of their vote policy on the topic of the combination of the board chair and CEO.
Outcome of the vote	Pass	Pass
Do the Trustees/ asset manager intend to escalate stewardship efforts?	L&G will continue to engage with investee companies, publicly advocate their position on this issue, and monitor company and market-level progress.	L&G will continue to engage with investee companies, publicly advocate their position on this issue, and monitor company and market-level progress.

Source: Investment Manager

HSBC Islamic Global Equity Index Fund

HSBC regard the votes against management recommendation as the most significant. With regards to climate, in their engagement they encourage companies to disclose their carbon emissions and climate-related risks in line with the recommendations of the Task Force on Climate-related Financial Disclosure (TCFD). Where companies in energy intensive sectors have persistently failed to disclose their carbon emissions and climate risk governance, HSBC generally vote against the re-election of the Chairman. HSBC also generally support shareholder resolutions calling for increased disclosure on climate-related issues.

Company Name	Apple Inc.	NVIDIA Corporation
Date of Vote	February 2025	June 2024
Summary of the resolution	Advisory Vote to Ratify Named Executive Officers' Compensation	Elect Director Stephen C. Neal
Size of the holding (% of portfolio)	8.4	7.7
How the firm voted	Against	Against
Was the vote against management and was this communicated beforehand?	Voted against management. This was not communicated beforehand.	Voted against management. This was not communicated beforehand.
On which criteria has the vote been deemed as 'significant'?	The company has a significant weight in the portfolio and HSBC voted against management.	The company has a significant weight in the portfolio and HSBC voted against management.
Outcome of the vote	Pass	Pass
Do the Trustees/asset manager intend to escalate stewardship efforts?	HSBC will likely vote against a similar proposal should they see insufficient improvements.	HSBC will likely vote against a similar proposal should they see insufficient improvements.

Source: Investment Manager.