

LEE BEESLEY DERITEND PENSION SCHEME

ENGAGEMENT POLICY IMPLEMENTATION STATEMENT

Financial Year Ending 5 April 2025

Introduction

This statement sets out how, and the extent to which, the stewardship policy and related policies on environmental, social and governance (“ESG”) factors and climate change set out in the Statement of Investment Principles (‘SIP’) have been followed during the year to 5 April 2025. This statement has been produced in accordance with The Pension Protection Plan (Pensionable Service) and Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2018, as amended, the subsequent amendment in The Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019 and the statutory guidance on reporting on stewardship in the implementation statement dated 17 June 2022.

Trustee Investment Objective

The Trustee believes it is important to consider the policies in place in the context of the investment objectives it has set.

As set out in the SIP, the Trustee’s primary investment objective is to achieve an overall rate of return that is sufficient to ensure that assets are available to meet all liabilities as and when they fall due.

In doing so, the Trustee also aims to maximise returns at an acceptable level of risk, taking into consideration the circumstances of the Scheme.

The Trustee also ensures that their investment objectives and the resultant investment strategy are consistent with the actuarial valuation methodology and assumptions used in the Statutory Funding Objective.

Investment Strategy

There was some material changes during the Scheme year to 5 April 2025, these changes are illustrated below:

- The Columbia Threadneedle Overseas Equity-Linked UK Inflation Fund changed to Columbia Threadneedle Global Equity-Linked UK Inflation Fund;
- The Columbia Threadneedle UK Equity-Linked Inflation Fund closed, the proceeds were invested in the Columbia Threadneedle Global Equity-Linked UK Inflation Fund;
- The Ninety One Global Multi-Asset Sustainable Growth Fund was replaced by the Ninety One Global Macro Allocation Fund;
- The StoneHarbor Multi Asset Credit Portfolio closed, and the Trustee agreed to invest the proceeds into the M&G Total Return Credit Investment Fund;
- The Pictet Multi Asset Portfolio Fund has closed, the Trustee agreed to invest the proceeds into the Pictet Dynamic Asset Allocation Fund;
- Later in the Scheme year, the Trustee agreed to de-risk the investment strategy, and this resulted to the termination of the Ninety One Global Macro Allocation Fund and the Columbia Threadneedle Global Equity-Linked UK Inflation Fund.

The investment strategy of the Scheme as at 5 April 2025 was split 30% Diversified Growth, 15% Equity, 30% Multi Asset Credit, 5% Freehold Property, 7.5% Real LDI and 12.5% Nominal LDI. The Trustee also agreed to disinvest from the BlackRock UK Property Fund, with the proceeds earmarked for the Columbia Threadneedle Multi Asset Fund. However, there is currently a queue on redemptions on this fund.

Statement of Investment Principles

The Scheme's SIP was last updated in September 2020. The Scheme's SIP is in the process of being finalised following the implementation of the new investment strategy noted above. The changes made to the Statement reflected the regulatory requirements that were introduced aimed at strengthening Trustee's investment duties in relation to ESG and stewardship and arrangements with their investment Managers.

Policy on ESG, Stewardship and Climate Change

The Trustee understands that they must consider all factors that have the potential to impact upon the financial performance of the Scheme's investments over the appropriate time horizon. This includes, but is not limited to, environmental, social and governance (ESG) factors.

The Scheme's SIP is currently being updated to reflect the new investment strategy for the year ending 5 April 2025. Once finalised and signed by the Trustee, the updated SIP will be published online. Until then, the existing SIP, dated September 2020, will remain in effect. The Scheme's SIP includes the Trustee's policies on ESG factors, stewardship and Climate Change.

The policies were last reviewed in September 2020 and are currently in the process of being reviewed as part of the review of the Scheme's investment strategy. The Trustee keeps its policies under regular review with the SIP subject to review at least triennially.

Scheme's Investment Structure

The Scheme's only investment (excluding the Freehold Property) is a Trustee Investment Policy (TIP) with Mobius Life Limited (Mobius). Mobius provides an investment platform and enables the Scheme to invest in pooled funds managed by third party investment managers.

As such, the Trustee has no direct relationship with the Scheme's underlying investments managers, but have the responsibility of monitoring the pooled funds, in conjunction with advice received from their investment advisor, Mercer.

Trustee Engagement

In the relevant year, the Trustee has not engaged with Mobius or the underlying pooled investment managers on matters pertaining to ESG, stewardship or climate change.

Investment performance reports are provided to the Trustee from Mercer on a quarterly basis and include ESG specific ratings (derived by Mercer). This enables the Trustee to determine whether further action should be taken in respect of specific funds. The Trustee is satisfied that Mercer's ESG scores for the Fund's managers are satisfactory.

The Trustee continues to work with Mercer, to consider actions that can be taken to engage with their investment managers going forward.

Information on the investment managers' approach to responsible investment, voting (including significant votes) and engagement with the investee companies is available at the following websites:

BlackRock:

<https://www.blackrock.com/corporate/sustainability>

Columbia Threadneedle:

<https://www.columbiathreadneedle.com/en/gb/institutional/about-us/responsible-investment/>

Pictet:

<https://www.pictet.com/us/en/responsible-vision>

Ninety One:

<https://ninetyone.com/en/united-kingdom/sustainability>

Legal & General:

<https://www.lgim.com/uk/en/responsible-investing/>

M&G:

<https://www.mandg.com/who-we-are/mandg-investments/responsible-investing-at-mandg-investments>

All the Scheme's investment managers are signatories of the UK Stewardship Code as follows:

Manager	Signatory since
BlackRock	2021
Columbia Threadneedle	2022
Pictet	2022
Ninety One	2021

Legal & General	2021
M&G	2021

Source: FRC website

Taking all the above into consideration, the Trustee is satisfied that Responsible Investment is central to the investment managers' approaches to investing.

Voting Activity

The Scheme has no direct relationship with the pooled funds it is ultimately invested in, and therefore no voting rights in relation to the Scheme's investments. The Trustee has therefore effectively delegated its voting rights to the managers of the funds the Scheme's investments are ultimately invested in.

Over the Scheme year, the Trustee has not been asked to vote on any specific matters and have therefore not cast any votes.

The DWP released a set of Engagement Policy Implementation Statement requirements on 17 June 2022, "Reporting on Stewardship and Other Topics through the Statement of Investment Principles and the Implementation Statement: Statutory and Non-Statutory Guidance" to be adopted in all Engagement Policy Implementation Statements for schemes with years on or after 1 October 2022. The most material change was that the Statutory Guidance provides an update on what constitutes a "significant vote".

- A significant vote is defined as one that is linked to the Scheme's stewardship priorities/themes;
- A vote could also be significant for other reasons, e.g. due to the size of holding;
- Trustee is to include details on why a vote is considered significant and rationale for voting decision.

The Trustee has identified that climate change, human rights and diversity, equity and inclusion are their most important stewardship priorities. The significant votes shown in this statement relate to this.

Appendix 1 sets out a summary of the key voting activity over the financial year of the pooled funds in which the Scheme's assets are ultimately invested for which voting is possible (i.e., those funds which include equity holdings).

This includes information on what the fund managers consider to be a significant vote. The Trustee has no influence on the managers' definitions of significant votes but have noted these and are satisfied that they are reasonable and appropriate.

The Appendix shows those significant votes supplied by the investment manager which the Trustee determines to be a significant vote – ie those that are in relation to climate change, human rights and diversity, equity and inclusion. Given the number of significant votes supplied, the Trustee has applied a size filter on grounds of materiality and only considered votes to be significant if in relation to a company that constitutes 1.00% or more of the diversified growth funds and 1.50% or more for the L&G Life KY World Equity Index Fund – GBP Currency Hedged.

The Trustee notes that best practice in developing a statement on voting and engagement activity is evolving and will continue to take on board industry activity in this area before the production of next year's' statement.

Assessment of how the Engagement Policies in the SIP have been followed for the year to 5 April 2025

The Trustee is satisfied that the Engagement Policies set out in the SIP, which have been in place over the year has been followed.

Appendix 1 – Voting Activity

The table below sets out a summary of the key voting activity over the financial year:

Manager / Fund	Proxy voter used?	Votes cast			Most significant votes (description)	Significant votes
		Votes in total	Votes against management endorsement	Abstentions		
Columbia Threadneedle Multi Asset Fund	ISS – to take recommendations and vote via ISS.	5,818 resolutions eligible for (99.1% cast)	7.6% of votes cast	1.2% of votes cast	Columbia Threadneedle consider a significant vote to be any dissenting vote i.e. where a vote is cast against (or where they abstain/withhold from voting) a management-tabled proposal, or where they support a shareholder-tabled proposal not endorsed by management.	Amazon.com, Inc.
	Glass Lewis & Co. – recommendations only. IVIS – recommendations only.					Shareholder Resolution - Report on Median and Adjusted Gender/Racial Pay Gaps Date of vote: 22 May 2024 Size of holding: 1.30% of portfolio Voting: For Resolution Manager Rationale: “The proposed enhanced disclosure would help the board and shareholders better assess existing and potential future risks related to human capital management.” Was this communicated to company ahead of vote: No Vote Outcome: Resolution failed Next steps: Active stewardship (engagement and voting) continues to form an integral part of CT’s research and investment process. Significance: The nature of this resolution is aligned with the Trustee’s key stewardship priority of “Diversity, Equity, and Inclusion”. Amazon.com, Inc.

Shareholder Resolution - Report on Customer Due Diligence
Date of vote: 22 May 2024
Size of holding: 1.30% of portfolio
Voting: For Resolution
Manager Rationale: “Shareholders would benefit from increased disclosure on the company’s approach to customer due diligence. The company faces risks related to human rights in its global operation. Good practices include developing a clear process and narrative on how impacts are monitored and effectively mitigated.”
Was this communicated to company ahead of vote: No
Vote Outcome: Resolution failed
Next steps: Active stewardship (engagement and voting) continues to form an integral part of CT’s research and investment process.
Significance: The nature of this resolution is aligned with the Trustee’s key stewardship priority of “Human Rights”.
Amazon.com, Inc.
Shareholder Resolution - Commission Third Party Study and Report on Risks Associated with Use of Rekognition
Date of vote: 22 May 2024
Size of holding: 1.30% of portfolio
Voting: For Resolution
Manager Rationale: “Shareholders would benefit from increased disclosure on the company’s approach to customer due

diligence. The company faces risks related to human rights in its global operation. Good practices include developing a clear process and narrative on how impacts are monitored and effectively mitigated.”

Was this communicated to company ahead of vote: No

Vote Outcome: Resolution failed

Next steps: Active stewardship (engagement and voting) continues to form an integral part of CT’s research and investment process.

Significance: The nature of this resolution is aligned with the Trustee’s key stewardship priority of “Human Rights”.

Alphabet, Inc.

Shareholder Resolution - Publish Human Rights Risk Assessment on the AI-Driven Targeted Ad Policies

Date of vote: 07 June 2024

Size of holding: 1.0% of portfolio

Voting: For Resolution

Manager Rationale: “Shareholders would benefit from increased disclosure through a third-party assessment of the company’s commitment to its freedom of association policies and practices to provide assurance regarding the company’s claims.”

Was this communicated to company ahead of vote: No

Vote Outcome: N/A

Next steps: Active stewardship (engagement and voting) continues to form

						<p>an integral part of CT’s research and investment process.</p> <p>Significance: The nature of this resolution is aligned with the Trustee’s key stewardship priority of “Human Rights”.</p> <p>Meta Platforms, Inc.</p> <p>Shareholder Resolution - Report on Human Rights Impact Assessment of Targeted Advertising</p> <p>Date of vote: 29 May 2024</p> <p>Size of holding: 1.0% of portfolio</p> <p>Voting: For Resolution</p> <p>Manager Rationale: “The proposed enhanced disclosure would help the board and shareholders better assess existing and potential future risks related to human capital management.”</p> <p>Was this communicated to company ahead of vote: No</p> <p>Vote Outcome: N/A</p> <p>Next steps: Active stewardship (engagement and voting) continues to form an integral part of CT’s research and investment process.</p> <p>Significance: The nature of this resolution is aligned with the Trustee’s key stewardship priority of “Human Rights”.</p>
Pictet Dynamic Asset Portfolio	ISS - for voting execution and recommendations	8,160 resolutions eligible for (100.0% cast)	7.4% of votes cast	0.0% of votes cast	A vote is significant due to the subject matter of the vote, for example a vote against management, if the company is one of the	<p>Apple, Inc</p> <p>Shareholder Resolution - Report on Ethical AI Data Acquisition and Usage</p>

	<p>largest holdings in the portfolio, and/or they hold an important stake in the company.</p>	<p>Date of vote: May 2024</p> <p>Size of holding: 1.57% of portfolio</p> <p>Voting: For Resolution</p> <p>Manager Rationale: “A vote FOR this proposal is warranted, as improved transparency would provide shareholders the ability to evaluate the benefits and risks associated with the company's use of external data in the development of its artificial intelligence (AI) projects.”</p> <p>Was this communicated to company ahead of vote: No</p> <p>Vote Outcome: Resolution failed</p> <p>Next steps: Pictet noted the outcome of the vote. Where they believe the subject of the vote could present a material concern from an ESG perspective, they will continue to monitor and engage with the company, and are doing so in this case. If warranted, they will consider actions as part of their escalation strategy, including future voting decisions.</p> <p>Significance: The nature of this resolution is aligned with the Trustee’s key stewardship priority of “Human Rights”.</p> <p>Amazon Inc.</p> <p>Shareholder Resolution - Commission Third Party Assessment on Company's Commitment to Freedom of Association and Collective Bargaining</p> <p>Date of vote: 22 May 2024</p> <p>Size of holding: 1.18% of portfolio</p> <p>Voting: For Resolution</p> <p>Manager Rationale: “A vote FOR this proposal is warranted. Shareholders would benefit from increased transparency and</p>
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disclosure on how the company is managing human rights-related risks, particularly regarding freedom of association and collective bargaining rights.”

Was this communicated to company ahead of vote: No

Vote Outcome: Resolution failed

Next steps: Pictet noted the outcome of the vote. Where they believe the subject of the vote could present a material concern from an ESG perspective, they will continue to monitor and engage with the company, and are doing so in this case. If warranted, they will consider actions as part of our escalation strategy, including future voting decisions.

Significance: The nature of this resolution is aligned with the Trustee’s key stewardship priority of “Human Rights”.

Amazon.com, Inc.

Shareholder Resolution - Report on Impact of Climate Change Strategy Consistent With Just Transition Guidelines

Date of vote: 22 May 2024

Size of holding: 1.18% of portfolio

Voting: For Resolution

Manager Rationale: “A vote FOR this proposal is warranted, as shareholders would benefit from more disclosure on whether and how the company considers human capital management and community relations issues related to the transition to a low-carbon economy as part of its climate strategy.”

						<p>Was this communicated to company ahead of vote: No</p> <p>Vote Outcome: Resolution failed</p> <p>Next steps: Pictet noted the outcome of the vote. Where they believe the subject of the vote could present a material concern from an ESG perspective, they will continue to monitor and engage with the company, and are doing so in this case. If warranted, they will consider actions as part of their escalation strategy, including future voting decisions.</p> <p>Significance: The nature of this resolution is aligned with the Trustee's key stewardship priority of "Climate Change".</p>
Ninety One Global Macro Allocation	ISS – to produce custom research reports. Reports include vote recommendations (not instructions).	846 resolutions eligible for (92.9% cast)	5.1% of votes cast	2.0% of votes cast	These are considered to be those where there is a significant holding (>5% of the shares or 5% of a fund) and is a dissenting vote against management, or those where there is a significant qualitative factor in that the vote relates to: an ESG issue, a shareholder resolution with a dissenting vote against management, or a significant corporate transaction.	<p>Alphabet Inc.</p> <p>Shareholder Resolution - Report on Climate Risk in Retirement Plan Options</p> <p>Date of vote: 7 June 2024</p> <p>Size of holding: 1.54% of portfolio</p> <p>Voting: Against</p> <p>Manager Rationale: "Agree with ISS this is unnecessary".</p> <p>Was this communicated to company ahead of vote: Aligned to management</p> <p>Vote Outcome: Resolution failed</p> <p>Next steps: Not provided by the manager.</p> <p>Significance: The nature of this resolution is aligned with the Trustee's key stewardship priority of "Climate Change".</p>

Alphabet Inc.
Shareholder Resolution - Publish Human Rights Risk Assessment on the AI-Driven Targeted Ad Policies
Date of vote: 7 June 2024
Size of holding: 1.54% of portfolio
Voting: Against
Manager Rationale: “This proposal appears unnecessary and too onerous for a complex issue such as AI driven ad targeting”.
Was this communicated to company ahead of vote: Aligned to management
Vote Outcome: Resolution failed
Next steps: Not provided by the manager.
Significance: The nature of this resolution is aligned with the Trustee’s key stewardship priority of “Human Rights”.
NextEra Energy, Inc.
Shareholder Resolution - Disclose Board Skills and Diversity Matrix
Date of vote: 23 May 2024
Size of holding: 1.26% of portfolio
Voting: For
Manager Rationale: “Consistent with our voting last year we think it would be good for NextEra to provide additional disclosures at a more granular level beyond what they already provide in the proxy material”.
Was this communicated to company ahead of vote: No

Vote Outcome: Resolution failed

Next steps: Not provided by the manager.

Significance: The nature of this resolution is aligned with the Trustee’s key stewardship priority of “Diversity, Equity, and Inclusion”.

NextEra Energy, Inc.

Shareholder Resolution - Report on Climate Lobbying

Date of vote: 23 May 2024

Size of holding: 1.26% of portfolio

Voting: For

Manager Rationale: “Additional disclosure around the company’s framework for identifying alignments and its approach to addressing misalignments would allow shareholders to better evaluate the company’s lobbying efforts and align it with best practices that have been undertaken by some of its peers and is unlikely to be unduly burdensome for the company”.

Was this communicated to company ahead of vote: No

Vote Outcome: Resolution failed

Next steps: Not provided by the manager.

Significance: The nature of this resolution is aligned with the Trustee’s key stewardship priority of “Climate Change”.

Johnson & Johnson

						<p>Shareholder Resolution - Report on Gender-Based Compensation and Benefits Inequities</p> <p>Date of vote: 25 April 2024</p> <p>Size of holding: 1.01% of portfolio</p> <p>Voting: Against</p> <p>Manager Rationale: “Additional disclosure around the company’s framework for identifying alignments and its approach to addressing misalignments would allow shareholders to better evaluate the company’s lobbying efforts and align it with best practices that have been undertaken by some of its peers and is unlikely to be unduly burdensome for the company”.</p> <p>Was this communicated to company ahead of vote: Aligned to management</p> <p>Vote Outcome: Resolution failed</p> <p>Next steps: Not provided by the manager.</p> <p>Significance: The nature of this resolution is aligned with the Trustee’s key stewardship priority of “Diversity, Equity, and Inclusion”.</p>
<p>L&G Life KY World Equity Index Fund — GBP Currency Hedged</p>	<p>IVIS – for research purposes.</p> <p>ISS – for research purposes.</p>	<p>35,761 resolutions eligible for (99.7% cast)</p>	<p>20.6% of votes cast</p>	<p>0.3% of votes cast</p>	<p>Significant votes are determined using the PLSA criteria, these include but is not limited to votes of high profile where there is a degree of controversy, there is significant client interest or the vote is linked to an LGIM engagement campaign.</p>	<p>Amazon.com, Inc.</p> <p>Shareholder Resolution - Report on Customer Due Diligence</p> <p>Date of vote: 22 May 2024</p> <p>Size of holding: 2.21% of portfolio</p> <p>Voting: For</p> <p>Manager Rationale: “A vote in favour is applied as enhanced transparency over material risks to human rights is key to understanding the company is functions and organisation. While the company has</p>

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.”

Was this communicated to company ahead of vote: No

Vote Outcome: N/A

Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.

Significance: The nature of this resolution is aligned with the Trustee’s key stewardship priority of “Human Rights”.

Notes: ISS = Institutional Shareholder Services Inc.
IVIS = Institutional Voting Information Service
The information in the table has been provided by the investment managers for the year ending 31 March 2025.