

W & J Leigh Staff Pension Scheme

Implementation Statement for year ended 5 April 2026

August 2026

Introduction

This statement has been prepared by the Trustee (the "Trustee") of the W & J Leigh Staff Pension Scheme (the "Scheme") with input from its Investment Consultants. The statement demonstrates how the Trustee has acted on certain policies within their Statement of Investment Principles (SIP).

Each year the Trustee must produce an Implementation Statement that demonstrates how they have followed certain policies within their SIP over the Scheme year. This Implementation Statement covers the year from 6 April 2025 to 5 April 2026.

This Implementation Statement has been prepared in accordance with the Occupational Pension Schemes (Investment and Disclosure) Regulations 2005 Amendments and is in respect of the Defined Benefit (DB) investments held by the Scheme. Note that this excludes any Additional Voluntary Contribution investments held by the Scheme.

Trustees of DB pension schemes are required to provide details of how, and the extent to which, their SIP policies on engagement with investee companies have been followed over the year, including a description of their voting behaviour, the most significant votes cast and any use of a proxy voter on their behalf over the year.

SIP policies

This Implementation Statement should be read in conjunction with the Scheme's SIP covering the year under review, which gives details of the Scheme's investment policies along with details of the Scheme's governance structure and objectives.

The Scheme's SIP in place during the Scheme year states the following policies on the exercise of voting rights and engagement activities related to their investments:

- "The Trustees' policy towards financially material considerations (including, but not limited to, environmental, social and governance considerations, including climate change) is to monitor the Investment Manager to whom they delegate this function through investment in pooled funds. The Investment Manager produces regular reports on their engagement with companies on environmental, social and governance considerations."
- "In addition to performance measures, the Trustees will review the engagement activity of the Investment Manager to ensure that active engagement is taking place where possible to influence positive change in relation to ESG factors within investee companies. The Trustees will also monitor the voting activity of the Investment Manager to check alignment with their views on ESG. "
- "If the Trustees believe that the Scheme's Investment Manager is no longer acting in accordance with the Trustees' policies, including those regarding ESG and stewardship, the Trustees will take the following steps:
    - engage with the Investment Manager in the first instance, in an attempt to influence its policies on ESG and stewardship; and
    - if necessary, look to appoint a replacement Investment Manager or managers which are more closely aligned with the Trustees' policies and views."

This Implementation Statement reviews the voting and engagement activities, as well as the extent to which the Trustee believes its policies have been followed, over the 12-month period to the year ended 5 April 2026.

Description of voting behaviour

The Trustee reviews and monitors the voting and engagement activity taken by the investment manager, L&G Asset Management Limited ("L&G") on their behalf. Information published by L&G provides the Trustee with comfort that its voting and engagement policies have been followed during the year.

Over the year to 5 April 2026, the Scheme had no direct or indirect equity holdings, thus there is no voting data to report.

Proxy voting

The Trustee did not employ a proxy-voting service during the year under review.

L&G votes by proxy as, given the scale of its holdings, the manager cannot be present at all shareholder meetings to cast votes. L&G votes by proxy through the Institutional Shareholder Services' (ISS) electronic voting platform. It should be noted that all voting decisions are made by L&G using its individual market specific voting policies, with L&G's own

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research only supplemented by ISS recommendations and research reports produced by the Institutional Voting Information Service (IVIS). To ensure L&G's proxy provider votes in accordance with their position on ESG, L&G has put in place a custom voting policy with specific voting instructions. L&G publicly communicates its vote instructions on its website with the rationale for all votes against management.

How engagement policies have been followed

The Trustee reviews and monitors the voting and engagement activity taken on their behalf on an annual basis. The information published by the Investment Manager on their engagement policies has provided the Trustee with comfort that their voting and engagement policies have been followed during the Scheme year.

As set out in the SIP, the Trustee expects L&G to engage with investee companies on aspects such as performance, strategy, capital structure, management of actual or potential conflicts of interest, risks, corporate governance, social and environmental issues concerning the Trustee's investments.

Details of specific voting and engagement topics are shown in the following table:

Voting and Engagement topic	Policy followed in the opinion of the Trustee?	Comments
Performance of debt or equity issuer	✓	L&G voting and engagement policies do not cover the past financial performance of investee companies. However, the voting and engagement which has been undertaken aims to improve the long-term future performance of the investee companies.
Strategy	✓	L&G believes that board independence, diversity and remuneration can have a financially material impact on the assets it invests within, with the Board ultimately responsible for the strategy for any company that L&G invests in or holds as a counterparty. L&G has clear voting policies covering each of these topics and has acted on them throughout the Scheme year on behalf of the Trustee.
Risks	✓	L&G has clear voting policies on ensuring that companies manage risk effectively and have robust internal controls. As an example of reducing risk, L&G encourages all audit committee chairs globally to have a financial background and be entirely comprised of independent non-executive directors.
Social and environmental impact	✓	L&G has stated that it will vote against the chair of the board if it believes insufficient action is being taken on the issue of climate change. L&G has engaged with companies that have poor climate scores relative to their size and for those that don't meet minimum standards; if these minimum standards are not met over time, L&G may look to divest until progress is shown.
Corporate governance	✓	L&G's policy from 2020 is to vote against all elections which combine the roles of CEO and Chair. L&G has reinforced its position on leadership structures across its stewardship activities such as via individual corporate engagements and director conferences. In 2024, L&G further enhanced its global policy expectations that at least 40% of company boards and executive leadership teams are women.

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Conflicts of interest	✓	Remuneration of personnel can lead to conflicts of interest between the principal (shareholder) and agent (management). Over the period under review, L&G voted against incentive awards which did not have performance conditions, as these awards would not fully align remuneration with company performance.
Capital structure	✓	L&G has policies on voting in respect of resolutions regarding changes to company capital structure such as share repurchase proposals and new share issuance. For example, L&G has a policy that newly issued shares should not expose minority shareholders to excessive dilution.

Engagement with investee companies

Exercising voting rights is not the only method of influencing behaviours of investee companies. Non-equity investments such as the Scheme's corporate bond holdings can include engagement activities but these investments do not carry voting rights.

The Trustee expects the investment manager to engage with investee companies on aspects such as performance, strategy, capital structure, management of actual or potential conflicts of interest, risks, corporate governance, social and environmental issues concerning the Trustee's investments.

L&G actively engages with the investee companies via direct messages and meetings with management and engagements via email to influence positive ESG practice. It is also noted that there is substantial overlap between the companies in which L&G holds debt and equity and so, while the corporate bond mandate does not hold voting rights, L&G's position as the equity holder elsewhere will likely result in it having voting rights to compound the impact and influence that L&G has on each company's practices.

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

Over the 12 months to 31 March 2026, L&G undertook 2,911 engagements with 2,801 companies. Some engagements cover multiple topics and L&G has provided the following summary:

- 2,679 on environmental topics;
- 68 on social topics;
- 392 on governance issues; and
- 122 on other topics including finance and strategy.

The top five engagement topics included climate change, deforestation, remuneration, climate mitigation and strategy.

The engagement statistics for each of the funds invested in, where available, are shown below. The engagement statistics are for the 12-month period to 31 March 2026, as L&G only provide data on a quarterly basis.

	Total engagements	No. unique companies engaged	Environmental topics	Social topics	Governance topics	Other topics
L&G Buy & Maintain Credit Fund	269	151	192	16	71	47
L&G Cash Fund	7	4	5	2	3	-

The remainder of the Scheme's assets are invested in fixed-interest and index-linked government bonds with the purpose of reducing risk by hedging the exposure to interest rate and inflation inherent in the Scheme's liabilities. L&G has governance practices in place to capture key regulatory developments which might influence the future management and performance of these assets.

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Extent to which the Trustee's policies have been followed during the year

Having reviewed the actions taken by L&G, the Trustee believes that their policies on engagement and voting rights (where applicable) have been implemented appropriately and in line with the Investment Manager's policies over the year. The Trustee will continue to monitor the actions taken on their behalf each year whilst pressing for improved information from L&G, particularly with respect to ESG factors.

If the Investment Manager deviates substantially from the Trustee's stated policies, the Trustee will initially engage with L&G in an attempt to influence its policies on ESG and stewardship. If it is concluded that the difference between the policies and L&G's actions is material, the Trustee will consider terminating the mandate and appointing a replacement manager more closely aligned with the Trustee's policies and views.

For and on behalf of the Trustee of the W & J Leigh Staff Pension Scheme

August 2026

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