

MARTIN CURRIE RETIRMENT AND DEATH BENEFITS PLAN

ACCOUNTING YEAR TO 31 MAY 2025

IMPLEMENTATION STATEMENT

Background

The Department for Work and Pensions (DWP) implements regulation which aim to improve disclosure of financially material risks.

The regulatory requirements recognise Environmental, Social and Governance (ESG) factors as financially material, and UK pension plan trustees are required to consider how these factors are managed as part of their fiduciary duty.

The regulations require the Trustee to detail policies in the Plan's Statement of Investment Principles ("SIP") and demonstrate adherence to these policies in an implementation report on an annual basis.

Statement of investment principles

There were no changes to the Plan's SIP over the reporting year. However, to account for strategic changes implemented in March 2025 (detailed within this report), the SIP was updated in July 2025, after the accounting year-end.

The current SIP can be found online at the web address:

https://www.clearbridgeinvestments.co.uk/_data/assets/pdf_file/0020/64028/Martin-Currie-Retirement-and-Death-Benefits-Plan-SIP.pdf

Implementation Report

This implementation report is to provide evidence that the Trustee continues to follow and act on the principles outlined in the Plan's SIP, including:

Actions the Trustee has taken to manage financially material risks and implement the key policies in their SIP;

The current policy and approach with regards to ESG and the actions taken with managers on managing ESG risks;

The extent to which the Trustee has followed policies on engagement covering engagement actions with the Plan's fund managers and, in turn, the engagement activity of the fund managers with the companies in the investment mandate;

The voting behaviour by investment managers (noting the Trustee's delegation of Plan voting rights to the investment managers through its investment via pooled fund arrangements), covering the reporting year up to 31 May 2025 for and on behalf of the Plan, including the most significant votes cast on the Plan's behalf;

Summary of key actions undertaken over the Plan's reporting year

Following Company consultation, the Trustee revised the Plan's investment strategy to better reflect the strength of the Plan's funding position, as well as the Trustee and Company's agreed direction of travel.

The agreed changes acted to reduce the Plan's Global Equity exposure from 40% to 32% (as a % of Plan assets), with the strategic allocation to Multi-Asset Credit (MAC) increasing from 10% to 18% (as a % of Plan assets).

This activity was completed in March 2025.

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This report demonstrates that the Trustee of the Martin Currie Retirement and Death Benefits Plan has adhered to their investment principles and policies for managing financially material considerations including ESG factors and climate change.

Signed



Position Trustee Director

Date 17-Dec-2025

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IMPLEMENTATION STATEMENT (CONTINUED)

MANAGING RISKS AND POLICY ACTIONS – As set out in current SIP.

Risk	Definition	How it is managed	Actions over reporting period
Interest rates and inflation	The risk of mismatch between the value of the Plan assets and present value of liabilities from changes in interest rates and inflation expectations.	To hedge a fixed proportion, as agreed by the Trustee, of these risks on the Plan's Technical Provisions basis via a leveraged Liability Driven Investment (LDI) portfolio.	No action, change or material deviation from stated policy over accounting period.
Liquidity	Difficulties in raising sufficient cash when required without adversely impacting the fair market value of the investment.	To maintain a sufficient allocation to liquid assets so that there is a prudent buffer to pay members benefits as they fall due (including transfer values) and to provide collateral to the LDI manager. The Plan's assets are invested in pooled funds which are readily realisable.	No actions or change to policy or level of interest rate and inflation hedging over the accounting year period.
Market	Experiencing losses due to factors that affect the overall performance of the financial markets.	To remain appropriately diversified and hedge away any unrewarded risks, where practicable.	The Trustee partially de-risked the Plan's investment strategy acknowledging the Plan's improved funding position. This involved partially disinvesting from Global Equity, with proceeds invested in the MAC allocation – a lower-risk mandate.
Credit	Default on payments due as part of a financial security contract.	To diversify this risk by investing in credit markets across different geographies and sectors. To appoint investment managers who actively manage this risk by seeking to invest only in debt securities where the yield available sufficiently compensates the Plan for the risk of default.	No actions or change to policy or level of interest rate and inflation hedging over the accounting year period.
Environmental, Social and Governance ("ESG")	Exposure to ESG factors, including but not limited to climate change, which can impact the performance of the Plan's investments.	To appoint managers who satisfy the following criteria, unless there is a good reason why the manager does not satisfy each criterion: 1. Responsible Investment ('RI') Policy / Framework	

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		2. Implemented via Investment Process 3. A track record of using engagement and any voting rights to manage ESG factors 4. ESG specific reporting 5. Signatory to the UN Principles for Responsible Investment ('UN PRI') The Trustee monitors the managers on an ongoing basis.	
Currency	The potential for adverse currency movements to have an impact on the Plan's investments.	Allow the Plan's active managers who invest in overseas securities the flexibility to hedge overseas currency exposure to manage risk.	
Non-financial	Any factor that is not expected to have a financial impact on the Plan's investments.	Non-financial matters are not taken into account in the selection, retention or realisation of investments.	

CHANGES TO THE SIP

No change to SIP over accounting year period. However, to account for strategic changes implemented in March 2025 (detailed within this report), the SIP was updated shortly after the accounting year-end in July 2025.

Date last updated: July 2025

IMPLEMENTING THE CURRENT ESG POLICY AND APPROACH

ESG as a financially material risk

The SIP describes the Trustee's policies with regards to ESG as a financially material risk.

The below table outlines the key areas on which the Plan's investment managers are assessed on when evaluating their ESG policies and engagements. The Trustee reviews the Plan's ESG policies and engagements periodically to ensure they remain fit for purpose.

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Key areas of assessment and ESG beliefs

Area of assessment	Trustee's beliefs
1. Risk	- The Trustee recognises that ESG factors, including climate change, can all influence the investment performance of the Plan's portfolio. - The Trustee believes it is in members' and the Plan's best interests that these factors are taken into account within the investment process and that ESG risks are identified and avoided or mitigated as best as possible. - The Trustee believes that investing with a manager who approaches investments in a responsible way and takes account of ESG-related risks will lead to better risk adjusted performance results as omitting these risks in investment analysis could skew the results and underestimate the level of overall risk being taken.
2. Appointment of investment managers	- The Trustee will work with the Investment Consultant to help select the investment managers that have passed the initial ESG screening. ESG screening will involve some of the following activities but is not limited to ensuring the managers are signatories to UNPRI, reviewing the managers' own ESG policies, investigating the extent to which these policies are integrated into their standard procedures of investment research and analysis. - The Trustee will take into consideration the investment managers' approaches to ESG factors, including climate change considerations, with respect to their selection of investments and is satisfied that a responsible approach, which is consistent with the long-term financial interests of the Plan and its members, is undertaken.
3. Monitoring of investment managers	- The Trustee will monitor the performance, strategy, risks, ESG policies, including climate change considerations, and corporate governance of the investment managers. If the Trustee has any concerns, they will raise them with the respective managers, verbally or in writing. - The Trustee will also refer to output from Isio's Sustainable Investment research team's appraisal process, whereby investment managers are rated on a number of quantitative and qualitative factors, ESG considerations are taken into account in this process. This process is also applied to existing investment managers.
4. Engagement	- As the Trustee invests the Plan's assets in pooled funds, the Trustee acknowledges that the influence it can have on the ESG policies and practices, including climate change considerations, of the companies in which its managers invest, is potentially limited. - The Trustee will continue to review the available products and approaches in this space and strive for the Plan to continue to deliver strong risk-adjusted returns, incorporating responsible investments principles into the process, where possible.

Trustee's approach to investment managers' voting and engagement policies.

The Trustee has concluded that the decision on how to exercise voting rights should be left with their investment managers, who will exercise these rights in accordance with their respective published proxy voting policies.

These policies, which are provided to the Trustee from time to time, take into account the financial interests of shareholders and should be for the Plan's benefit. Where this primary consideration is not prejudiced, the investment manager should engage with companies to take account of ESG factors, including climate change considerations, in the exercise of such rights.

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The Trustee notes that the investment managers' proxy voting policies are available on request and on their respective websites.

The investment managers are aware that their continued appointment is based on their success in delivering the mandate for which they have been appointed to manage. If the Trustee is dissatisfied, then they will look to replace the manager.

Investment managers' engagement activity over reporting year

As the Plan invests via investment managers, the managers provided details on their engagement actions for the 12-month period to 31 May 2025, including a breakdown where available of engagements by ESG themes. Note, some engagements may cover more than one ESG theme.

Due to reporting constraints, the managers were only able to provide engagement data to the nearest available quarter-end date, 31 March 2025.

Fund name	Engagement summary	Commentary
Various MCIM Equity Funds	Total engagements: 33 Of which: - Environmental: 9 - Social: 5 - Governance: 15 - Other: 4	MCIM provide Shareholder reports for each underlying fund which provide information on engagement activity. Example of significant engagement(s) include: Unilever MCIM continue to engage with Unilever on their target to reduce the use of virgin plastic in their production line by 50% by the end of 2025. Unilever scaled back their target to 30% and extended the timeframe to the end of 2026. MCIM re-engaged the company to understand the changes to the company's sustainability targets under the Growth Action Plan. MCIM continue to engage with the company noting their concern on Unilever's inability to meet their initial target and whether they will be able to achieve this, now reduced, target.
M&G Total Return Credit Investment Fund	Total engagements: 21 Of which: - Environmental: 19 - Social: 5 - Governance: 1 - Other: 2	M&G have a systematic approach to engagements whereby specific objectives are outlined in advance and results measured based on the outcomes from the engagements. M&G Analysts are expected to have a more granular awareness of key ESG risks which impact the individual issues they monitor. Where engagement is deemed to be necessary, analysts engage with issuers supported by M&G's Corporate Finance & Stewardship ("CF&S") Team, allowing them to leverage their expertise and sustainability themes. Example of significant engagement(s) include: London Stock Exchange Group M&G initiated discussions on improving disclosure around the Group's ethnicity pay gap data as part of its annual reporting, in line with the FCA-proposed methodology for ethnicity pay gap reporting. LSEG confirmed they already

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		voluntarily report ethnicity pay-gap data; however, they are slightly diverged from the method used by the FCA. In their view, the FCA-proposed methodology is only relevant in the context of the UK. Instead, the company took the decision to follow global “best practice”, as although they are UK-listed, they also operate in 60 countries globally. While the company is keen to be as transparent as they can, there are no immediate plans to disclose this data externally. M&G were comfortable with the rationale but continue to monitor any issues from the divergence in methodology, lack of disclosure, and continue to engage with LSEG on an ongoing basis on this topic. Capital One As Capital One plan to acquire Discover Financial Services, M&G engaged with the company to align its sustainability practices with Discover’s standards. M&G urged Capital One to establish a Scope 2 emissions reduction target and to disclose / publish Scope 3 Category 15 emissions data. While Capital One initially deemed a Scope 2 target unnecessary, as they currently report 100% renewable energy usage, M&G proposed a “maintenance target” to sustain renewable commitments, which they agreed to review. On Scope 3, the company is refining its Category 15 calculations and plans to disclose once confident in the methodology. Target-setting challenges include consumer-driven credit card usage and electric vehicle (“EV”) adoption rates for auto loans, with commercial clients posing data hurdles due to varying disclosures. M&G will revisit post-acquisition, following discussions with Capital One’s climate lead and Investor Relations (“IR”) team, to track progress on these priorities.
Insight Liquid ABS Fund	No. of entities engaged: c.55 Total engagements: 55 - 60 Insight were unable to provide a breakdown of the Fund’s engagement by ESG theme.	Insight engage with underlying portfolio constituents across all funds on a range of ESG issues, mainly related to corporate governance within portfolio companies and share issuance, including within the securitised credit space. Insight engage with regulators, governments, and other industry participants to address long-term structural issues. However, due to the nature of securitised assets (thousands of underlying loans, direct investment removed via a Special Purpose Vehicle), engagements can be difficult. However, Insight continue to assess securitised issuers and counterparties.
Insight LDI Funds	Total engagements: 126 No. of entities engaged: 75	Insight continued to engage with a number of industry participants on long-term strategic issues relating to LDI, including:

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	Of which: - Environmental: 64 - Social: 38 - Governance: 26 - Other: 16 (Note: some engagements will classify under multiple ESG topics)	• Green gilt issuance • Liaising with the FCA and TCFD in relation to climate change reporting disclosures • Working with derivative counterparty banks on the integration of ESG factors into the assessment of credit risk. The team regularly engages with regulators, governments and other industry participants to address long-term structural issues and aim to stay ahead of regulatory changes and adopt best practice.
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Investment managers' voting activity over reporting year (applicable for the Plan's equity funds only)

The Trustee has acknowledged responsibility for the voting policies that are implemented by the Plan's investment managers on their behalf.

The Plan's fund managers have provided details on their voting actions covering the reporting year up to 31 May 2025, as well as examples of "significant" votes. Due to reporting constraints, the managers were only able to provide voting data to the nearest available quarter-end date, 31 March 2025.

Fund name	Voting summary	Example of a significant vote(s)	Commentary
Various MCIM Equity Funds	Votable Proposals: 1,980 Proposals Voted: 100.0% Of which: - For: 94.4% - Against: 5.0% - Abstain/Withheld: 0.6%	AstraZeneca Topic: Governance Proposal: Increase long-term variable CEO pay to 850% of base salary (from 650%). Remuneration - Size of CEO pay package vs FTSE 100 CEOs. Vote: Against, as not in line with MCIM values. Outcome: The proposal passed with 64% of the vote. This was in conflict with MCIM's voting, given their expectation that CEO's remuneration should reasonably align performance with shareholder value and should not be deemed excessive. MCIM continue to monitor future proposals that may arise on this topic.	Martin Currie uses ISS as their proxy voting advisor. ISS provides voting recommendations for Martin Currie, in accordance with their own policy, which is closely aligned with the Martin Currie internal policy. Martin Currie's voting decisions are informed by their own internal work, ISS, and a specialist governance advisor. They assess voting matters on a case-by-case basis but are guided by their over-arching principles on good corporate governance.

Notes: Values are the % of total votable proposals. Totals may not sum due to rounding.