Implementation Statement for the year to 31 March 2026

Halstead Group Pension Scheme (the "Scheme")

1. Introduction

The Trustees of the Scheme (the "**Trustees**") are required to make publicly available online a statement (the "Implementation Statement") covering the extent to which the Trustees have followed the Scheme's Statement of Investment Principles (the "**SIP**"). The SIP was last amended in March 2024, in compliance with the regulation which requires the Trustees to review the SIP every 3 years and after any significant change in investment policy as a minimum.

This SIP came into force from 04 March 2024.

A copy of the current SIP can be found here Microsoft Word - The Statement of Investment Principles_Halstead Group Pension scheme - 4 March 2024 - print version.

This Implementation Statement covers the period from 1 April 2025 to 31 March 2026 (the "**Scheme Year**"). It sets out:

– How the Trustees' policies on stewardship have been followed over the Scheme Year; and

– The voting by or on behalf of the Trustees during the Scheme Year, including the most significant votes cast and any use of a proxy voter during the Scheme Year.

This Implementation Statement has been drafted by the Trustees to provide details on how the Trustees complied with the statutory guidance from the Department for Work and Pensions ("**DWP**") on exercising its stewardship policy stated in the SIP. A copy of this Implementation Statement is available on the following website: https://jameshalstead.com/investor/governance-leadership

2. Trustees' Stewardship policy and how it followed this policy over the Scheme Year

As described in the SIP, the Trustees have instructed Schroders Investment Management Limited (the "**fiduciary manager**") to exercise its voting and other rights as shareholder in a manner the fiduciary manager believes to be consistent with best practice in relation to Corporate Governance and in accordance with the Institutional Shareholders' Committee's ("ISC") Statement of Principles on the Responsibilities of Institutional Shareholders and Agents. The Trustees take responsibility for regularly reviewing the approach and stewardship policy of the fiduciary manager to ensure they are aligned with the Trustees' stewardship priorities and objectives.

The Trustees have set six thematic engagement priorities in line with their fiduciary manager's, to ensure alignment on voting and engagement. The priorities include **Climate Change; Corporate Governance; Human Capital Management; Human Rights; Diversity and Inclusion**, and **Natural Capital and Biodiversity**. The Trustees believe that these themes are material to the long-term value of the investments, and that companies which address these issues meaningfully will drive improved financial performance for the Scheme and ultimately benefit the Scheme's members and beneficiaries.

The Trustees therefore require their fiduciary manager, who is also the investment manager, in its stewardship of the Scheme's assets, to prioritise these six engagement themes, alongside the investee companies’ performance, strategy, capital structure, management of actual or potential conflicts of interest, risks, social, ethical and environmental impact and corporate governance when considering the purchase, retention or sale of investments.

The Trustees oversee their fiduciary manager’s voting and engagement activities to ensure compliance with this requirement. Reporting on the fiduciary manager’s voting and engagement activities and how these activities have had a bearing on the purchase, retention and sale of investments is included in the quarterly investment monitoring reports.

The Trustees have considered the voting and engagement activities that took place on their behalf by the fiduciary manager during the Scheme Year, with voting activities described in the next section. **The Trustees are satisfied that their fiduciary manager has carried out stewardship activities on the trustees’ behalf in line with the stewardship policy described in the Scheme’s SIP.** In particular, the Trustees noted the following:

- The fiduciary manager demonstrated very high levels of voting rights being exercised on the Trustees’ behalf where voting is relevant to the mandate.
- Challenge to investee company management was demonstrated through the proportion of votes against management led resolutions.
- The fiduciary manager also voted based on its own voting policies, taking into considerations of the engagement priorities of the Trustees, rather than blankly followed the recommendations of the proxy adviser, demonstrated by the percentage of votes voted in contrary to the recommendation of proxy adviser. This demonstrates a good implementation of the Trustees’ stewardship policy via voting.
- The fiduciary manager also carried out a high level of engagement activities with the management of investee companies across the Trustees’ six engagement themes, including progress on some issues. The engagement activities were provided to the Trustees in the regulator reporting provided by the fiduciary manager throughout the year for the Trustees to provide their oversight on the fiduciary manager’s stewardship activities.

3. Voting statistics over the Scheme Year

The Trustees have delegated the responsibility for voting on their behalf to the fiduciary manager. Most voting rights associated with the Scheme's investments pertain to the underlying securities within the pooled funds managed by the fiduciary manager. In a general meeting of a company issuing these securities, the fiduciary manager exercises its voting rights on behalf of the Trustees according to its own voting policy.

Summary of voting

Only the Scheme's Diversified Growth Fund holdings invest in assets with voting rights attached. The table below summarises the fiduciary manager's voting behaviour over the 12 months period to 31 March 2026. The fiduciary manager's voting policies can be found in the appendix.

Funds where voting is relevant	Schroders Diversified Growth Fund
Total meetings eligible to vote	1,324
Total resolutions eligible to vote	17,412
Of resolutions eligible to vote, % of resolutions voted on	95.7%
Of voted resolutions, % vote with management	89.6%
Of voted resolutions, % vote against management	10.4%
Of voted resolutions, % abstained	<1.0%
Of voted resolutions, % vote contrary to the recommendation of proxy adviser (if applicable)	8.5 %

Note:

- Data is sourced from the investment manager, Schroders Investment Management.
- Schroders Investment Management use Glass Lewis ("GL") for proxy voting services and receive Institutional Shareholder Services ("ISS")' Benchmark research. Alongside ISS's research, Schroders receives recommendations from GL in line with its own bespoke guidelines which can be found in the appendix. This is complemented with analysis by their in-house ESG specialists and where appropriate with reference to financial analysts and portfolio managers.

Most significant votes

The following criteria must be met for a vote to be considered 'significant':

- Must be defined as significant by the fiduciary manager; and
- Must relate to the Trustees' stewardship priority themes

Of the votes that satisfy the above criteria, the Trustees have selected one vote relating to each of the priority themes that they deem material to the long-term value of the investments. These votes are hereby defined as 'most significant votes', and as per DWP guidance, the Trustees have communicated this definition of 'most significant votes' to the fiduciary manager.

All of the most significant votes over this Scheme Year have been reported below.

CLIMATE CHANGE

At the Shell annual general meeting (AGM) on 20 May 2025, Schroders voted for a Shareholder proposal requesting that the company disclose whether and how its demand forecast, its production targets and new capital expenditures in liquefied natural gas (LNG) are consistent with its climate commitments, including its net zero target by 2050. Schroders supported this shareholder resolution as it believes the additional disclosure requests are clear, focused and relate to a material aspect of the company's climate transition plan. Although Shell already provides robust transparency and publishes valuable energy outlooks, Schroders believe the resolution identified specific areas for improvement. Enhanced disclosure in these areas would strengthen the quality of information available to investors.

Schroders believe how they have voted is in the best financial interests of their clients' investments. This was a vote against management, and the shareholder proposal was not successful. Schroders have engaged with Shell several times on climate since the failed proposal, including on LNG disclosures.

NATURAL CAPITAL AND BIODIVERSITY

At the Amazon.com Inc. annual general meeting (AGM) on 21 May 2025 Schroders voted for a proposal regarding reporting on plastic packaging. The proposal called for Amazon to produce a detailed report on its use of unrecyclable flexible plastic packaging, a material widely criticized for its environmental impact, especially on marine ecosystems. Amazon is believed to be one of the largest users of flexible plastic packaging globally, yet it does not disclose the tonnage used. The proposal aimed to increase transparency and encourage reduction strategies. Schroders view is that the current scope of reporting on plastics can be expanded and that this would be additive to current company efforts.

Schroders believe that how they have voted is in the best financial interest of their clients' investments. This vote was against management who believe that their existing sustainability reporting is sufficient. This proposal was not approved, however despite the rejection, Amazon has made notable progress on improving its sustainability practices in relation to plastic packaging, namely in 2024, when it cut plastic packaging by over 25%.

HUMAN RIGHTS

At the Johnson & Johnson annual general meeting (AGM) on 24 May 2025 Schroders voted to support a shareholder proposal asking for the company to "produce a human rights impact assessment ("HRIA") covering Johnson&Johnson's operations, activities, business relationships, and products related to access to medicines." This proposal was filed by Mercy Investment Services, Inc., a socially responsible investor, and is grounded in international human rights frameworks. The proponent's request is focused on human rights due diligence in Johnson &

Johnson's operations, specifically related to pricing and access of its products. Although the company has a due diligence process in place across its business, the proponent raised concerns that its lobbying activities could undermine its commitments related to access.

This was a vote against the management recommendation, and Schroders voted to support this proposal because they believe the company could benefit from an impact assessment of its activities in its own operations related to access to medicine, where it is exposed to regulatory and reputational risks. Schroders believe that how they have voted is in the best financial interest of their clients' investments. This vote against management was unsuccessful.

CORPORATE GOVERNANCE

At the Meta Platforms Inc. annual general meeting (AGM) on 29 May 2025, Schroders voted for a shareholder proposal regarding disclosure of voting results based on class of shares. Given the dual-share class structure and unequal voting rights, the concerns of all shareholders are often not clearly reflected in current disclosures of voting results. Meta's dual-class structure gives Class B shares 10x the voting power of Class A shares. Mark Zuckerberg holds nearly all Class B shares, giving him a majority of total voting power, despite owning a much smaller percentage of the economic interest.

Schroders voted against the management recommendation as they believe that separating the voting results by share class would enable shareholders to better understand where their concerns are aligned to other shareholders and to better monitor the responsiveness of the company in addressing issues raised. Schroders believe how they have voted is in the best financial interests of their clients' investments. This vote against management was unsuccessful.

HUMAN CAPITAL MANAGEMENT

At the Amazon.com Inc. annual general meeting (AGM) on 21 May 2025, Schroders voted for a shareholder proposal requesting a report on warehouse working conditions. Schroders appreciate Amazon's ongoing engagement with them on this topic and investments in their workforce, however, they believe third party oversight on working conditions would be beneficial given the scrutiny and reputational risk the company faces around this topic. The resolution was driven by mounting concerns over Amazon's labour practices, including allegations of excessive surveillance, unsafe quotas, and high injury rates.

This was a vote against management, who believe that additional audits would be redundant and costly. This vote against the management recommendation was unsuccessful.

DIVERSITY AND INCLUSION

At the Wells Fargo annual general meeting (AGM) on 29 April 2025, Schroders voted for a shareholder proposal requesting that the company publish an annual report on the prevention of workplace harassment and discrimination. Schroders supported this proposal given the ongoing litigation the company faces related to its hiring practices, and their view that shareholders would benefit from greater disclosure of the company's efforts in this area. Schroders believe enhanced transparency would help demonstrate how the company is managing material human capital risks.

This vote against management was unsuccessful, and the resolution was not approved. Schroders have engaged with Wells Fargo multiple times since the failed proposal. As a priority engagement company, Schroders will continue to engage with Wells Fargo on both diversity and inclusion and fair and decent treatment of workers.

The Trustees are satisfied that the voting and engagement activities undertaken by the fiduciary manager align with the stewardship priorities of the Trustees over the Scheme Year, hence the Trustees believe that they did satisfactorily implement the Stewardship Policy stated in the Scheme's SIP over the Scheme Year.

Dated: 03/07/2026

Signed for and on behalf of the Trustees of the Scheme:

.... Name (Print)

.... Signature

.... Date

.... Name (Print)

.... Signature

.... Date

Appendix 1 – ESG, Voting and Engagement Policies

The links to the voting and engagement policies of the fiduciary manager can be found below:

Fiduciary Manager	Voting & Engagement Policy
Schroders Investment Management Limited	Voting: https://mybrand.schroders.com/m/6197143c263420f5/original/Schroders-Group-Sustainable-Investment-Policy.pdf Engagement: https://mybrand.schroders.com/m/1d7b11399a5fa4b9/original/613798_SC_Listed-Assets-Blueprint-2025.pdf