

Asahi Glass Fluoropolymers Pension Scheme (“the Scheme”) – DC Section

Annual Implementation Statement for the Year Ended 30 November 2024

1. Introduction

This statement sets out how, and the extent to which, the Statement of Investment Principles (“SIP”) produced by the Trustees has been followed during the year to 30 November 2024 (the “**Scheme Year**”). This statement has been produced in accordance with the Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018, 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.

The statement is based on, and should be read in conjunction with, the relevant versions of the SIP that were in place for the Scheme Year, which were the SIPs approved in 14 November 2023 (covering the period between 30 November 2023 to 7 January 2024) and the SIP approved in 8 January 2024 (covering the period between 8 January to 30 November 2024).

Sections 2.1 and 2.2 of this statement set out the investment objectives of the Scheme and changes which have been made to the SIP during the Scheme Year, respectively.

Section 2.3 of this statement sets out how, and the extent to which, the Defined Contribution (“DC”) Section of the SIPs has been followed. **The Trustees can confirm that all policies in the SIPs have been followed in the Scheme Year.**

A copy of the latest SIP is available at: <https://agcce.com/wp-content/uploads/2024/11/Asahi-Group-Fluoropolymers-Pension-Scheme-DC-Scheme-Statement-of-Investment-Principles-December-2023-illiquids-policy.pdf>

Section 3 includes information on the engagement and key voting activities of the underlying investment managers within the DC Section of the Scheme.

2. Statement of Investment Principles

2.1. Investment Objectives of the Scheme

The Trustees believe it is important to consider the policies in place in the context of the objectives they have set.

The objectives of the Scheme included in the SIP are as follows:

- The Trustees aim to provide suitable investment options that align to the needs of their members. They also aim for these options to enable members to achieve good outcomes at retirement as well as ensuring that members receive value for money.
- Make lifestyle strategies available as default solutions, which transition members’ investments from higher risk investment to lower risk investments as members approach retirement.
- Make self-select lifestyle strategies available for members.
- Offer an appropriate range of self-select funds across various asset classes.

2.2. Review of the SIP

During the Scheme Year, the Trustees reviewed the SIP and made amendments to ensure consistency with the Regulations implemented during 2024. These include adding the Trustees’ policy in relation to illiquid assets in adherence with new regulatory requirements. The revised SIP was approved in January 2024, following formal advice from the Trustees’ Investment Adviser, Mercer.

2.3. Assessment of how the policies in the SIP have been followed for the Scheme Year

The information provided in this section highlights the work undertaken by the Trustees during the Scheme Year and how it has driven long term value for beneficiaries where relevant. It sets out how this work followed the Trustees' policies in the relevant SIPs dated 14 November 2023 and 8 January 2024, relating to the DC Section of the Scheme.

In summary, it is the Trustees' view that the policies in the SIPs have been followed during the Scheme Year.



Investment Mandates

Securing compliance with the legal requirements about choosing investments

Policy

In considering the appropriate investments for the Scheme, the Trustees have obtained and considered the written advice of an Investment Adviser, whom the Trustees believe to be suitably qualified to provide such advice. The advice received and arrangements implemented are, in the Trustees' opinion, consistent with the requirements of Section 36 of the Pensions Act 1995 (as amended).

How has this policy been met over the Scheme Year?

During the 24 July 2024 meeting, the Trustees confirmed their intention to move the DC Section to a Master Trust arrangement. The new Master Trust arrangement will also serve as the Company's sole pension arrangement for all new hires in accordance with the Automatic Enrolment Regulations. The Trustees expect this transition to be concluded in H1 2025.

During the Scheme Year, the Trustees conducted a default investment strategy review in September 2024 with the assistance of the Scheme's Investment Adviser. The main conclusions of the review were:

- The Trustees remain comfortable with the current default investment strategies targeting drawdown for DC Only members and Cash for the DB Transferee members.
- The My Future Focus Growth fund has delivered returns that align with the objectives for both DC Only members and DB Transferee members. There were no recommended changes to the growth phase at this stage, and the current strategies remain fit for purpose.
- The de-risking period is adequate and the end asset allocation fits the objectives of the Scheme for both default options.
- Responsible investment is integrated across the actively managed and passive funds in the My Future Focus default investment strategies.
- The Scheme offers a well-diversified self-select fund range. No changes were recommended at this stage.

Realisation of Investments

Policy

The Scheme's administrator, Aviva, will realise assets following the receipt of member requests at retirement or earlier where required.

The Trustees consider the liquidity of the investments in the context of the likely needs of members.

How has this policy been met over the Scheme Year?

The Trustees received an administration report on a semi-annual basis to confirm that core financial transactions were processed within agreed SLAs and regulatory timelines. As confirmed in the Chair's Statement, the Trustees are satisfied that, on balance, the requirements were met during the year, with an overall SLA achievement of 99.5% for both financial & non-financial demands. For core financial transactions, 100% were completed within 5 days of receipt and for non-core demands, 94.4% were completed within this same period. The Trustees consider that the requirements for processing core financial transactions specified in the Administration Regulations (The Occupational Pension Schemes (Scheme Administration) Regulations 1996) have been met.

All funds in which the Scheme invests are pooled and unitised and there were no liquidity concerns arising in respect of the Scheme's investment fund holdings over the Scheme Year to 30 November 2024.



Environmental, Social and Governance (“ESG”)

Financial and non-financial considerations and how those considerations are taken into account in the selection, retention and realisation of investments

Policy

The Trustees believe that Environmental, Social, and Governance (ESG) factors can create both a risk and an opportunity, each of which should be reviewed. In the Trustees' view, ESG and Stewardship can materially impact the best financial interests of the Scheme beneficiaries, as such, it is essential to take into consideration ESG factors in long-term investment decisions.

The Trustees believe 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.

The Trustees are aware of the investment managers' approaches to social, environmental and ethical factors with respect to the selection of investments and are satisfied that a responsible approach is being taken which is consistent with the long-term financial interests of the Scheme and its members.

When interacting with the Scheme's investment managers and advisers, the Trustees will work with the Investment Adviser in choosing managers that take into account ESG factors, and ensure that the Scheme's managers are signatories of United Nations Principles for Responsible Investment (UNPRI).

How has this policy been met over the Scheme Year?

Investment monitoring reports were reviewed by the Trustees on a six-monthly basis (as at Q1 and Q3). They included manager ratings, ESG ratings, performance over 3, 6 and 12 months, 3 and 5 years, as well as more detailed analysis of default fund performance from the Trustees' investment adviser, Mercer.

The Scheme's SIP includes the Trustees' policy on ESG, Stewardship and Climate Change. This policy sets out the Trustees' beliefs on ESG and climate change and the processes followed by the Trustees in relation to voting rights and stewardship.

Where managers may not be highly rated from an ESG perspective, the Trustees monitor the suitability of these funds on an ongoing basis. When implementing a new manager, the Trustees consider the ESG rating of the manager. The ESG policies of each fund manager are reviewed on an ongoing basis by the Investment Adviser's Global Manager Research Team. The Trustees' ongoing reviews did not flag any ESG-related concerns and no changes were made to the investments over the Scheme Year.

The Trustees have previously worked with the Investment Consultant in choosing managers who take into account ESG factors and ensure that the Scheme's managers are signatories of the UK Stewardship Code. The code aims to enhancing the quality of engagement between institutional investors and the companies in which they invest, advocating for transparency and accountability, mandating that investors report on their stewardship activities and outcomes. All investment managers that the Scheme invests in continued to be signatories of the UK Stewardship Code.

During the year, no additional ESG funds were made available to members, as the Trustees had previously introduced an ESG-focused option and agreed to move the Scheme to a Master Trust arrangement.



Monitoring the Investment Managers

Incentivising asset managers to align their investment strategies and decisions with the Trustees' policies

Policy

The underlying investment managers are appointed based on their capabilities and, therefore, their perceived likelihood of achieving the expected return and risk characteristics required for the asset class being selected.

Mercer, on behalf of the Trustees, monitors the underlying investment managers to ensure their continuing appropriateness for the mandates given. If any manager is downgraded by Mercer's Manager Research Team, the Trustees will review the suitability and appointment of the manager and replace them if necessary. None of the underlying managers with whom the members' assets are invested have performance-based fees which could encourage the manager to make short-term investment decisions to hit their profit targets. The Trustees therefore consider that the method of remunerating fund managers is consistent with incentivising them to make decisions based on assessments of medium to long-term financial and non-financial performance of an issuer of debt or equity. By encouraging a medium to long-term view, it will in turn encourage the investment managers to engage with the issuers of debt or equity in order to improve their performance in the medium to long-term.

How has this policy been met over the Scheme Year?

The Trustees' focus is on longer-term performance, but shorter-term performance is also monitored to ensure any concerns can be identified in a timely manner. Over the Scheme Year, the Trustees reviewed both absolute and relative performance of the investment managers' products (or funds) on a semi-annual basis.

During the Scheme Year, no changes were implemented to the fund range available.

Evaluation of asset managers' performance and remuneration for asset management services

Policy

The Trustees are long-term investors and do not look to change the investment arrangements on a frequent basis. All funds are open-ended with no set duration for the arrangement.

The Trustees therefore consider that the method of remunerating fund managers is consistent with incentivising them to make decisions based on assessments of medium to long-term financial and non-financial performance of an issuer of debt or equity. By encouraging a medium to long-term view, it will in turn encourage the investment managers to engage with the issuers of debt or equity in order to improve their performance in the medium to long-term.

The Trustees accept that they cannot influence the charging structure of the pooled funds in which the Scheme invests but are satisfied that the ad-valorem charges for the different underlying funds are clear and are consistent with each fund's stated characteristics. The Trustees are therefore satisfied that this is the most appropriate basis for remunerating the underlying investment managers and is consistent with the Trustees' policies as set out in this SIP.

How has this policy been met over the Scheme Year?

Over the Scheme Year, the Trustees received investment manager performance reports on a semi-annual basis. The Trustees reviewed the investment performance in meetings which included its Investment Adviser's forward-looking assessment of the funds' ongoing ability to achieve their respective return objectives. The Trustees remained comfortable with the investment options they had chosen for the Scheme on this basis. Performance of the funds was also considered during the triennial investment strategy review. The conclusion from this review was that the funds

used for both DC Only and DB Transferee members offer returns in line with the Scheme objectives. Whilst the Trustees' focus has been on long-term performance, they also take shorter-term performance into account.

As part of the "Small Scheme" Value for Members Assessment carried out after the Scheme year end, Regulations require the Trustees to compare costs & charges, and net performance, of the Scheme against three alternative DC arrangements. As part of this assessment, the Trustees have assessed the fees disclosed. The Trustees concluded that they were satisfied that the stated explicit charges for the Scheme's funds represent reasonable value from a costs and charges perspective and also, following the transition to Aviva's Master Trust in 2025, this should increase the value for members from a cost perspective.

During the Scheme Year, no changes were implemented to the fund range available.

Monitoring portfolio turnover costs

Policy

The Trustees consider portfolio turnover costs as part of the annual Value for Members assessment. Portfolio turnover costs mean the costs incurred as a result of the buying, selling, lending or borrowing of investments.

How has this policy been met over the Scheme Year?

The Trustees consider the DC Section's portfolio turnover costs as part of the annual Small Scheme Value for Members assessment.

While the transaction costs provided appear to be reflective of costs expected of the various asset classes and markets that the Scheme invests in, there is not yet any "industry standard" or universe to compare these to. It is worth noting that transaction costs can be negative, thus contributing positively to performance. However, negative transaction costs are not expected to exist over the long-run.

The Trustees are also aware of the requirement to define and monitor targeted portfolio turnover and turnover range.

Given that the members invest in a range of pooled funds, some of which invest across a wide range of asset classes, the Trustees do not have an overall portfolio turnover target for the Scheme. The Trustees continued to work with Mercer to determine the most appropriate way to obtain and monitor the information required in relation to the pooled funds in which the Scheme's members invest. Following the DC Section move to Master Trust in 2025, this will then be delegated to the Master Trust provider.

The duration of the arrangements with asset managers

Policy

The Trustees are long-term investors and do not look to change the investment arrangements on a frequent basis. All the funds are open-ended with no set end date for the arrangement. The self-select fund range and default investment strategy are reviewed on at least a triennial basis. A manager's appointment may be terminated if it is no longer considered to be optimal nor have a place in the default investment strategy or general fund range.

How has this policy been met over the Scheme Year?

All the funds are open-ended and have no set end date for the arrangement, however, duration is considered as part of the regular reviews. The DC Section's self-select fund range and default investment strategies are reviewed on at least a triennial basis. An underlying manager's appointment may be terminated if it is no longer considered to be optimal nor have a place in the default

investment strategies or self-select fund range. The latest review was undertaken during the Scheme year in September 2024. As a result of this review, no changes were made to the fund range available, as funds have performed in line with the objectives and members are provided with a well-diversified fund range.

Kinds of investments to be held, the balance between different kinds of investments and expected return on investments

Policy

The Trustees are permitted to invest across a wide range of asset classes. All of the funds in which the Scheme invests are pooled and unitised.

The Trustees will monitor the suitability of the funds utilised in the Lifestyle investment programmes and in the self-select range available to members on the Aviva MyMoney Platform and make changes as they consider appropriate.

The Trustees have assumed responsibility for setting an investment strategy that provides a broad level of protection against the key risks identified in Section 6 of the SIP.

How has this policy been met over the Scheme Year?

On a bi-annual basis, the Trustees review investment performance – this includes the risk and return characteristics of the default investment strategies and additional fund options, as well as evaluating how investment managers are meeting their specific mandates.

No changes to the default investment strategies or in the self-select range have been made during the Scheme Year. The Scheme's default investment strategies are in line with the Trustees' long-term strategy, and the Trustees have no major concerns with the lifestyle component funds and strategies. Following the investment strategy review started in July 2024 and presented in September 2024, the Trustees concluded that the funds used in the Scheme offered a well-diversified range covering most of the asset classes. Overall, the Trustees remained comfortable with the appropriateness of the funds. Responsible investment is also integrated across the actively managed and passive funds used within the default investment strategies.

Risks, including the ways in which risks are to be measured and managed

Policy

The Trustees are aware and seek to take account of a number of risks in relation to the Scheme's investments.

The Trustees recognise that in a defined contribution arrangement, members assume the investment risks themselves. The Trustees further recognise that members are exposed to different types of risk at different stages of their working lifetimes.

How has this policy been met over the Scheme Year?

As detailed in the risk table in the SIP, the Trustees consider both quantitative and qualitative measures for these risks when deciding investment policies, strategic asset allocation, the choice of fund managers / funds / asset classes. Furthermore, a quantitative risk analysis is done on an annual basis as part of the Trustee Report and Accounts, with the latest completed for the Scheme Year to 30 November 2024 during Q1 2025. As part of completing the triennial investment strategy review, the Trustees considered how the Scheme's growth phase risk and return compares against peers. Analysis of risk and return over 1, 3 and 5 year periods shows that the Aviva My Future Focus strategy is positioned within the lower risk takers among its peers while underperforming other peers with similar volatility over the 3 and 5 years period and outperforming most peers over the 1 year period to 31 March 2024.

The Trustees have also maintained a risk register detailing the key risks, including market risks, ESG, pension conversion, manager and liquidity risks. This rates the impact and likelihood of the risks and summarises existing mitigations and additional actions. The Risk Register was not reviewed during the Scheme Year, but the Trustees are currently considering a revision of this document in accordance with the requirements of the new General Code of Practice.

3. Voting and Engagement Disclosures

The exercise of the rights (including voting rights) attaching to the investments and undertaking engagement activities in respect of the investments (including the methods by which, and the circumstances under which, the Trustees would monitor and engage with relevant persons about relevant matters).

Policy

Investment managers are expected to evaluate these factors, including climate change considerations, and exercise voting rights and stewardship obligations attached to the investments in line with their own corporate governance policies and current best practice.

How has this policy been met over the Scheme Year?

The Trustees have delegated their voting rights to their investment managers. Investment managers are expected to provide voting summary reporting on a regular basis, at least annually.

Following the DWP's consultation effective for all scheme year ends on or after 1 October 2022, the Trustees have discussed and agreed that votes classified as most significant are the ones relating to the following priority areas:

- **Environmental** - Climate change: low-carbon transition and physical damages resilience; pollution & natural resource degradation: air, water, land (forests, soils and biodiversity);
- **Social** - Human rights: modern slavery, pay & safety in workforce and supply chains and abuses in conflict zones;
- **Governance** - Board Structure and Remuneration

The priority areas were selected by the Trustees based on their knowledge of the membership and a belief that a focus on these areas could lead to improved member outcomes.

Once appointed, the Trustees give investment managers, full discretion in evaluating ESG factors, including climate change considerations, and exercising voting rights and stewardship obligations attached to the investments, in accordance with their own corporate governance policies and current best practice, including the UK Corporate Governance Code and UK Stewardship Code.

Self-Select Range	Default Investment Funds
<ul style="list-style-type: none">- The following funds contain an allocation to equities:- Av MyM BlackRock (30:70) Currency Hedged Global Equity Tracker- Av MyM BlackRock Emerging Markets Equity (Aquila C)- Av MyM BlackRock European Equity Index Tracker- Av MyM BlackRock Japanese Equity Index Tracker- Av MyM BlackRock Pacific Rim Equity Index Tracker- Av MyM BlackRock UK Equity Index Tracker- Av MyM BlackRock World ex UK Equity Index Tracker- Av MyM BlackRock US Equity Index Tracker- Av MyM BNY Mellon Real Return- Av MyM HSBC Islamic Global Equity Index- Av MyM JPM Emerging Markets Equity- Av MyM Legal & General (PMC) Ethical UK Equity Index	<ul style="list-style-type: none">- The following funds contain an allocation to equities:- Av MyM My Future Focus Growth- Av MyM My Future Focus Drawdown- Av MyM My Future Focus Consolidation <p>The underlying equity components for the My Future Focus Funds are as follows:</p> <ul style="list-style-type: none">- Aviva Pensions US Passive Equity Index- Aviva Pensions UK Passive Equity Index- Aviva Pensions Euro Passive Equity Index- Aviva Pensions Japan Index Equities- Aviva Pensions Asia Pacific Passive Equity Index

<ul style="list-style-type: none"> - Av MyM Schroder Life Intermediated Diversified Growth - Av MyM Legal & General Future World Global Equity Index 	<ul style="list-style-type: none"> - AI SICAV Equity Global Emerging Markets Index Fund
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Overview of Managers Approach to Voting and Engagement

LGIM

LGIM's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by LGIM and LGIM do not outsource any part of the strategic decisions. To ensure LGIM proxy provider votes in accordance with LGIM position on ESG, LGIM have put in place a custom voting policy with specific voting instructions.

All decisions are made by LGIM's Investment Stewardship team and in accordance with LGIM relevant 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. This ensures LGIM's stewardship approach flows smoothly throughout the engagement and voting process and that engagement is fully integrated into the vote decision process, therefore sending consistent messaging to companies.

BlackRock

BlackRock's team and its voting and engagement work continuously evolves in response to changing governance related developments and expectations. BlackRock's voting guidelines are market-specific to ensure BlackRock take into account a company's unique circumstances by market, where relevant. BlackRock provides information on vote decisions through research and engage as necessary. BlackRock engagement priorities are global in nature and are informed by BlackRock's observations of governance related and market developments, as well as through dialogue with multiple stakeholders, including clients. BlackRock may also update its regional engagement priorities based on issues that BlackRock believes could impact the long-term sustainable financial performance of companies in those markets. BlackRock welcomes discussions with clients on engagement and voting topics and priorities to get their perspective and better understand which issues are important to them. As outlined in BlackRock Global Principles, BlackRock determines which companies to engage directly based on BlackRock's assessment of the materiality of the issue for sustainable long-term financial returns and the likelihood of BlackRock engagement being productive. BlackRock's voting guidelines are intended to help clients and companies understand BlackRock's thinking on key governance matters. They are the benchmark against which BlackRock assesses a company's approach to corporate governance and the items on the agenda to be voted on at the shareholder meeting. BlackRock applies guidelines pragmatically, taking into account a company's unique circumstances where relevant. BlackRock provides information on vote decisions through research and engage as necessary. If a client wants to implement their own voting policy, they will need to be in a segregated account. BlackRock's Investment Stewardship team would not implement the policy themselves, but the client would engage a third-party voting execution platform to cast the votes.

Aviva

Aviva subscribed to Glass Lewis research and receive both their benchmark reports (which we use for data analysis only and do not automatically follow their voting recommendations) and custom research based on our own policy, which Aviva can override in consideration of other factors, including internal views, additional context provided in external research, and company explanations. Aviva considers this the most efficient approach to voting thousands of meetings a year.

HSBC

HSBC uses the leading voting research and platform provider Institutional Shareholder Services (ISS) to assist with the global application of our voting guidelines. ISS reviews company meeting resolutions and provides recommendations highlighting resolutions which contravene our guidelines. HSBC reviews voting policy recommendations according to the scale of our overall holdings. The bulk of holdings are voted in line with the recommendation based on our guidelines.

Examples of Engagement Activity by the Scheme's Equity and Diversified Growth Investment Managers

Aviva engages on Tesco's promising climate strategy

Aviva Investors engaged with Lonza to discuss the company's climate transition strategy, emphasizing various critical aspects such as disclosures, targets, climate-related risk assessment and management, decarbonization of operations and the value chain, facility and energy management, research and development, product manufacturing processes, and circularity in operations.

Following the engagement, Lonza has made significant advancements. The company has implemented a site-related physical risk assessment utilizing a credible database to evaluate localized climate risks, which encompasses over 80% of its sales. This approach enables Lonza to gain a more nuanced understanding of its risk mitigation strategies. Furthermore, Lonza, in collaboration with five other major pharmaceutical companies, has entered into a substantial agreement with Envision Energy to secure access to renewable power in China. This initiative is expected to provide 200 GWh of renewable electricity annually, resulting in an estimated reduction of 120,000 tonnes of CO2 emissions. Additionally, Lonza is placing increased emphasis on enhancing the use-life of solvents in its production processes and is actively pursuing innovative methods to repurpose end-of-life equipment, as demonstrated by a case study involving the use of old equipment to produce PVC flooring in the United States.

BlackRock engages with Fubon Financial Holding Company Ltd.'s on board diversity

At the June 2023 Annual General Meeting (AGM) of Fubon Financial Holding Company Ltd., BlackRock did not support the election of the chair of the nomination committee due to concerns regarding the levels of gender diversity on the board. Following the 2023 AGM, a female director was appointed to the board as a representative of the Taipei City Government, a shareholder in the company. BlackRock was encouraged to observe the company nominate a second, qualified independent female director to the board at the June 2024 AGM. This director's professional experience was deemed additive, and BlackRock voted in support of her election.

LGIM engages with Volvo Car AB in cutting emissions

LGIM engaged with Volvo Car recognising the company as a technology leader within the European automotive sector. LGIM seeks to understand the capacity of Volvo and other automotive companies to enhance transparency regarding plug-in hybrid emissions, which is essential for achieving the goal of reducing vehicle emissions in Europe.

The initial phase of engagement has commenced, with LGIM contacting Volvo to arrange a comprehensive discussion on the regulations pertaining to plug-in hybrid technology. Questions have been submitted to the company, and LGIM is currently awaiting a response.

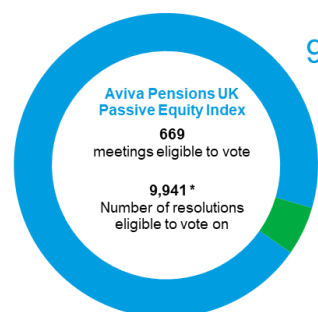
As this engagement is in its early stages, the forthcoming steps will involve reviewing Volvo's responses to the submitted questions. The objectives of this engagement include:

- Gaining a clear understanding of the current regulatory framework as perceived by the industry.
- Identifying the limitations surrounding the disclosure of plug-in hybrid electric vehicle (PHEV) emissions data held by Volvo and other original equipment manufacturers (OEMs).
- Depending on the responses received, discussing a framework for more proactive disclosure of real-world PHEV emissions to enhance transparency for stakeholders.

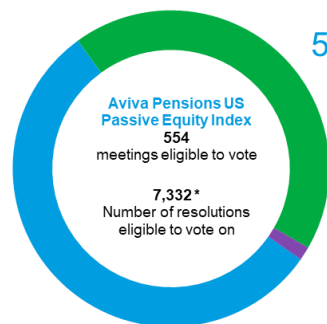
Voting Activity during the Scheme Year

Set out below is a summary of voting activity for this reporting period relating to the relevant strategies in the DC Section of the Scheme. **Votes “for / against management”** assess how active managers are in voting for and against management. **Purple** represents abstention.

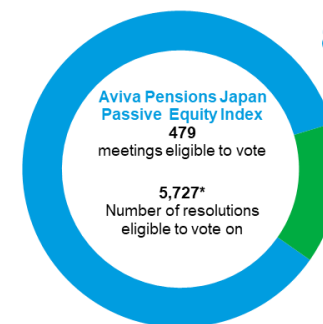
My Future Focus Funds and underlying Funds



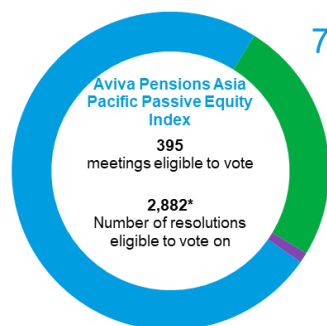
*99.4% of resolutions voted on



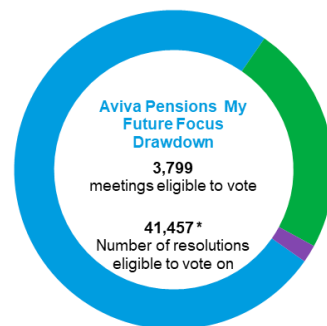
*98.8% of resolutions voted on



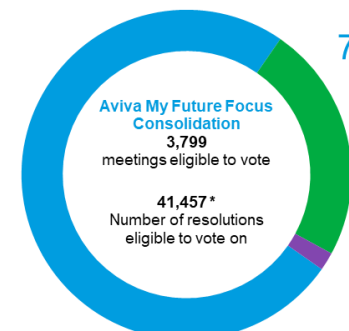
*100.0% of resolutions voted on



*98.2% of resolutions voted on

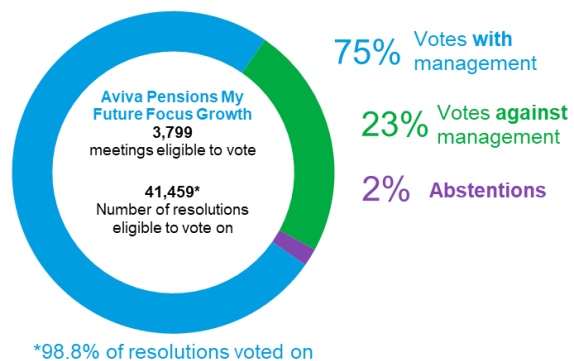


*98.9% of resolutions voted on

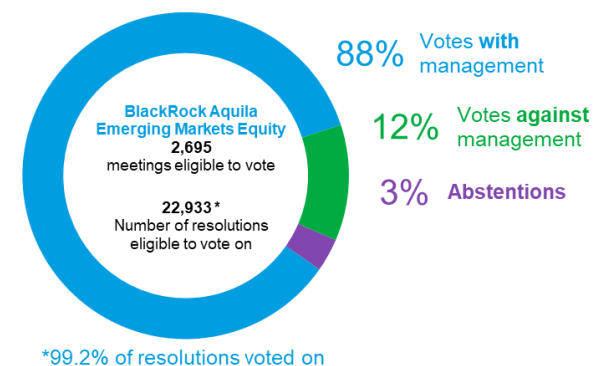
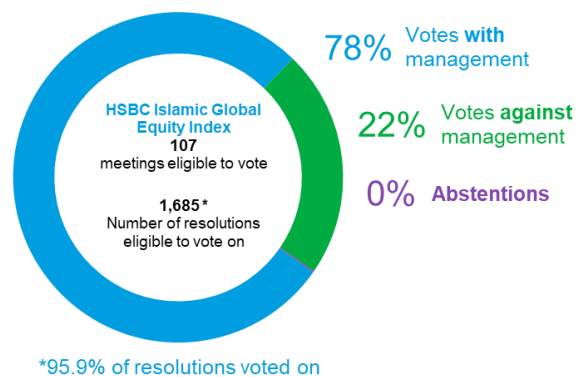
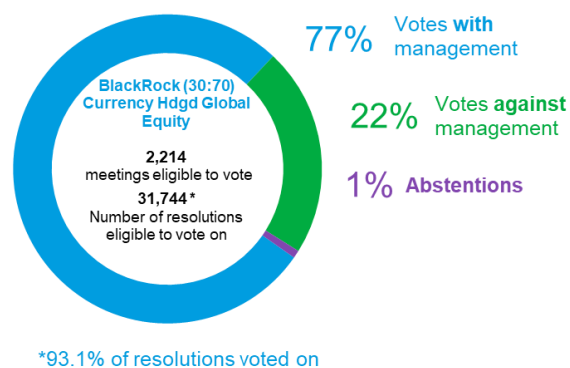


*98.9% of resolutions voted on

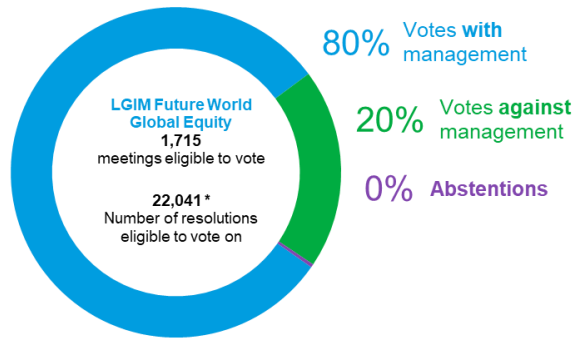
Source: Aviva. Data is for the 12 months to 31 December 2024.



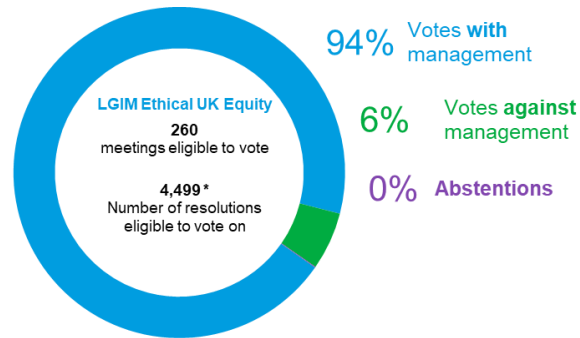
Self-Select Funds



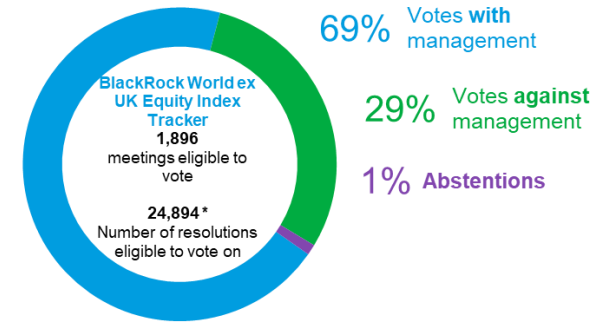
Source: Aviva. Data is for the 12 months to 31 December 2024.



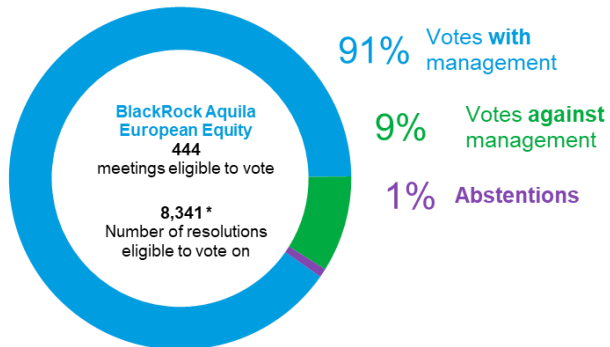
*99.5% of resolutions voted on



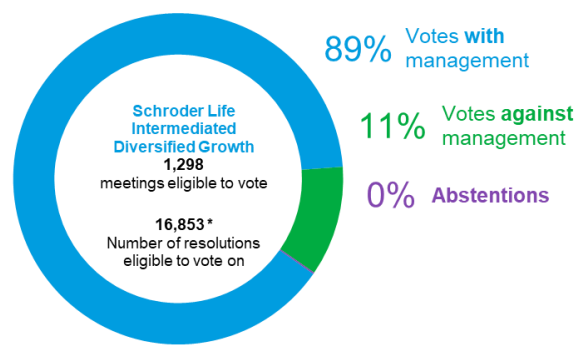
*100.0% of resolutions voted on



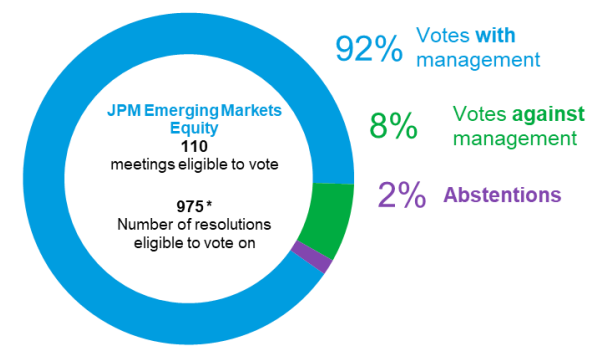
*91.1% of resolutions voted on



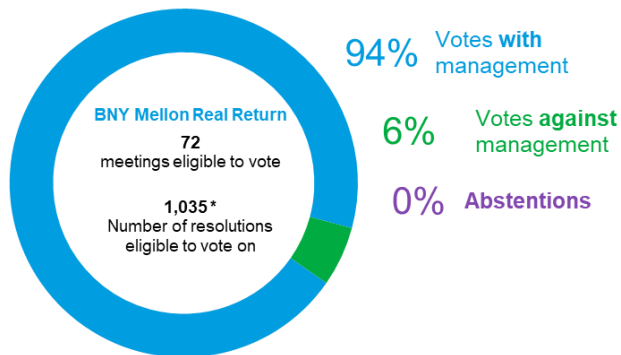
*83.5% of resolutions voted on



*96.0% of resolutions voted on



*99.5% of resolutions voted on



*99.2% of resolutions voted on

Source: Aviva. Data is for the 12 months to 31 December 2024.



Sample of the most significant votes

A sample of the most significant votes for underlying funds of the My Future Focus Growth, Drawdown and Consolidation is described below.




Following the updated guidance, the Trustees have discussed and agreed that votes classified as most significant are the ones relating to the following priority areas:



- Environmental - Climate change: low-carbon transition and physical damages resilience;
- Environmental - Pollution & natural resource degradation: air, water, land (forests, soils and biodiversity);
- Social - Human rights: modern slavery, pay & safety in workforce and supply chains and abuses in conflict zones
- Governance - Board Structure and Remuneration


The final outcome column below represents the result of the Resolution after all voting: Passed (✓) or Not-Passed (✗).


Approximate size of fund's holding as at the date of the vote (as % of portfolio of the Fund noted in the first column) is included on column **Size** on the table below.

Votes were selected by choosing one vote per fund that relates to one of the Trustees' Engagement Priority Themes and by selecting the ones with the largest size of fund holding.

Fund	Company	Size of fund holding (%)	Date	How the manager voted	Trustees' Engagement Priority	Summary of the Resolution	Rationale for the Manager vote	Final outcome	Relevant next steps
Aviva My Future Focus Growth	ASML Holdings NV	0.32%	24/04/2024	Against	Governance (Remuneration)	Elect Annet P. Aris to the Supervisory Board	Aviva voted against this resolution, as the nominee is the longest-serving member of the remuneration committee, due to the Company's poor history of remuneration practices. Aviva has engaged with the company and escalated its concerns regarding ongoing issues related to remuneration practices by voting against the longest-serving member of the Remuneration Committee for the first time.		Aviva has engaged with the company and escalated its concerns over ongoing concerns over remuneration practices by voting for the first time against the longest serving member of the Remuneration Committee.
Aviva My Future Focus Drawdown	Broadcom Inc	0.21%	22/04/2024	Against	Governance (Remuneration)	Advisory Vote on Executive Compensation	Aviva voted against this resolution following the failed Say on Pay resolution in 2023, which saw a dissent of 67.39%, primarily due to a \$10 million equity grant to the CEO and a \$160 million equity award on the first day of fiscal year 2023. Aviva believes the company should have provided a clearer and more robust response to address shareholder concerns. Notably, less than two-thirds of Long-Term Incentive Plan (LTIP) awards are performance-based (50.00%), indicating that pay arrangements are not adequately aligned with performance. The CEO-to-employee pay ratio stands at 510:1, considered excessive, representing an increase of 125:1 compared to the previous year. Additionally, there are concerns regarding the lack of established performance criteria for both long- and short-term programs, unchallenging performance metrics, misalignment of pay for performance—including instances of above-median benchmarking and the use of outsized peers—along with insufficient rigor in performance metrics and a lack of risk-mitigating policies.		If Aviva acknowledge that the resolution received a majority support this year, they still believe that the company should have provided a more clear and robust response to address shareholder concerns and that there is still a strong misalignment between pay arrangements and performance. As such, Aviva have escalated their concerns by voting against the Remuneration Report but also not supporting the re-election of the Chair, as communicated to the company.
Aviva My Future Focus Consolidation	Ashtead Group Plc	0.04%	04/09/2024	For	Governance (Remuneration)	Approve the Remuneration Policy	Under normal circumstances Aviva would have voted against the new pay policy to reflect material increases to long term incentive (LTI) opportunity. However, Aviva		The outcome of the vote will have a bearing on whether the company retains its UK listing. Aviva



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							have exceptionally supported as they were consulted over the increases and understand that Ashtead, is struggling to compete on executive pay with its US peers because pay there is so much higher, and this competitive disadvantage is a key retention risk, particularly given Ashtead has been a strong performer. Aviva is satisfied with the stretch in performance targets, many of which have been increased to reflect the additional award opportunity.		followed up with the company detailing the issues that they will be keeping under close review / be part of their considerations going forward.
Aviva Pensions US Passive Equity Index	Amazon	3.70%	22/05/2024	For	Environmental (Climate Change)	Shareholder Proposal Regarding Report on Plastic Packaging	Aviva supports the proposal, which is in line with the expectations outlined in the VBDO Investor Statement on Plastic AI signed in May 2023. This statement calls for FMCG and grocery retail companies to establish a clear plan to reduce material consumption, prioritising the elimination of single-use packaging and promoting reusable packaging systems, with defined timelines and external verification. Aviva believes that issuing a report and setting this goal would be significant steps in advancing these objectives.		Following the filing of a similar proposal last year, Amazon took a positive step by releasing certain plastic use data for packaging used in its owned and operated fulfilment centres. It did not include packaging related to products generated by its Whole Foods subsidiary or more than 100 of its private label brands. As a result, the Company lags competitors who have disclosed this data and made commitments to reduce virgin plastic use by a specific amount and to make plastic packaging recyclable by a specific date.
Aviva Pensions Passive UK Equity Index	Shell Plc	7.58%	21/05/2024	Against	Environmental (Climate Change)	Approval of Energy Transition Update and Energy	Aviva accept that while Shell cannot move significantly ahead of policy, a company of its size and role should be at the forefront of the transition, which is not reflected in its capital expenditure plans. Aviva lacks conviction that Shell's existing strategy and capital expenditure plans align to its		In view of the aforementioned points and Shell's proven track record of responsiveness to engagement with us and other shareholders on this





Fund	Company	Size of fund holding (%)	Date	How the manager voted	Trustees' Engagement Priority	Summary of the Resolution	Rationale for the Manager vote	Final outcome	Relevant next steps
						Transition Strategy 2024	overarching commitment to the goals of the Paris Agreement.		matter, Aviva believe that continued, regular and constructive engagement over FY24 will be more effective in refining its strategy for success. Aviva have outlined their key focus areas for the company in their rationale for not supporting this resolution.
Aviva Pensions Japanese Equity Index	Toyota Motor Corporation	5.39%	18/06/2024	For	Environmental (Climate Change)	Shareholder Proposal Regarding Lobbying Activity Alignment with the Paris Agreement	Aviva supports the proposal requesting that Toyota conduct an annual review and issue a report describing if, and how, its climate-related lobbying activities, serve to reduce risks for the Company from climate change and how they align with the goals of the Paris Agreement and the Company's goal of carbon neutrality by 2050. While it is positive that Toyota has published a climate lobbying report, Aviva believes the report falls short of expectations. As per previous year, Aviva is supportive of this proposal and believe investors would benefit from greater disclosures in this area which would enable us to better evaluate the company's risk related to its lobbying activities.		As of May 2024, the Company is the only Japanese company to issue a report on its lobbying activities related to climate public policies, and it is continuing to dialogue with the proponent and other shareholders. A report could provide shareholders with more transparency on how the company's lobbying activities support this, which will help investors better evaluate any reputational and financial risks to their business model. Further details to their existing disclosures requested by the shareholder resolution could include how the company reviews its trade association memberships


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									and mitigates reputational and financial risks associated with misalignment of the lobbying activities conducted by its trade associations with Toyota Motor's own strategy and with the Paris Agreement goals.
Aviva Pensions Asia Pacific Equity Index	Woodside Energy Group Limited	1.23%	24/04/2024	Against	Environmental (Climate Change)	Approval of Climate Transition Action Plan and 2023 Progress Report	Aviva has significant concerns regarding the Company's responsiveness to its shareholders, a long-standing issue that it believes has not been adequately addressed in recent years. These concerns have been heightened by the Company's previous responses to shareholder dissent dating back to 2020. At the AGM that year, the Company received four shareholder proposals, including one that specifically requested alignment of its greenhouse gas emissions with the goals of the Paris Agreement. Despite this proposal receiving majority support (52%), Aviva noted a lack of disclosure on how the Company engaged with shareholders regarding this matter. Further, the proposal certainly was not implemented, as it, in part, requested the Company adopt Paris-aligned Scope 3 targets, which still has not been done. Four years after this vote, the Company only maintains a Scope 3 investment target and a Scope 3 emissions abatement target.		The company's responsiveness to its shareholders on climate concerns has been a long-running concern at the Company and they also voted against the Chair of the Board to reflect this. Aviva will be engaging with the company on this issue. It is now inconceivable for the Board to continue its trend of dismissing shareholder concerns following this overwhelming rejection of Woodside's climate plan.



Source: Aviva, managers as at 31 December 2024.


A sample of the most significant votes for the **self-select** funds is described below. At the time of writing this report, voting activity was not received for all self-select funds included within the fund range for which the Trustees will continue to work with the investment managers to try and obtain this information.

Fund	Company	Size of fund holding (%)	Date	How the manager voted	Trustees' Engagement Priority Theme	Summary of the Resolution	Rationale for the Manager vote	Final outcome	Relevant next steps
BlackRock (30:70) Currency Hedged Global Equity Tracker	Shell Plc	2.24%	21/05 /2024	Against	Environmental (Climate Change)	Regarding Scope 3 GHG Target and Alignment with Paris Agreement	Aviva voted against the shareholder resolution aimed at increasing the ambition of Shell's emission reduction targets, as it believed that moving materially ahead of policy would not enhance shareholder value for the company and could unduly constrain the board's decision-making. In Aviva's view, the adoption of the resolution would not lead to the desired reduction in greenhouse gas emissions.		In view of the aforementioned points and Shell's proven track record of responsiveness to engagement with Aviva and other shareholders on this matter, they believe that continued, regular and constructive engagement over FY24 will be more effective in refining its strategy for success. Aviva have outlined their key focus areas for the company in their rationale for not supporting this resolution.
BlackRock Aquila Emerging Markets	CSPC Pharmaceutical Group Limited	0.06	28/05 /2024	Against	Governance (Board Structure)	Elect Cai Dongchen as Director	Chair of the Nomination Committee is not independent.		BlackRock does not perceive engagement as one conversation. BlackRock have ongoing direct dialogue with companies to explain their views and how they evaluate their actions on relevant ESG issues over time. Where BlackRock have concerns that are not addressed by these conversations, they may vote against management for their action or inaction. Where concerns are raised either through voting or during engagement, BlackRock monitor developments and assess whether the company has addressed their concerns.

Fund	Company	Size of fund holding (%)	Date	How the manager voted	Trustees' Engagement Priority Theme	Summary of the Resolution	Rationale for the Manager vote	Final outcome	Relevant next steps
BlackRock Aquila European	Temenos AG	0.05%	07/05 /2024	Abstain	Governance (Remuneration)	Approve Remuneration Report	BlackRock did not support this resolution because, in their view, the proposed remuneration disclosures does not provide sufficient understanding of the company's remuneration policies and the link between performance-based pay and company performance.		The proposal did not pass at the May 2024 AGM, receiving approximately 33% shareholder support. In response, Temenos released a statement re-affirming the board's awareness of shareholder concerns while attributing remuneration issues to "exceptional circumstances around the transition to a new CEO." The company also stated that it will continue to reflect on the vote result and provide a more detailed rationale in its remuneration disclosures. BlackRock will continue to engage with the company to discuss its approach to future remuneration structures.
HSBC Islamic Global Equity Index	Apple Inc.	8.62%	28/02 /2024	For	Social (Gender Equality)	Report on Median Gender/Racial Pay Gap	Aviva believe that the proposal would contribute to improving gender inequality.		Aviva will likely vote for a similar proposal.
JPM Emerging Markets	Shoprite Holdings Ltd.	0.48%	11/11 /2024	Against	Governance (Remuneration)	Approve Remuneration Policy	Remuneration committees should use the discretion to ensure that the remuneration policy properly reflects business priorities, however JPMAM do not expect companies to seek overarching discretion to amend the remuneration policy.		JPMAM will continue to engage with the company, publicly advocate for their position on this issue and monitor company and market-level progress.
BlackRock World ex UK Equity Index Tracker	Nestle SA	0.45%	18/04 /2024	Against	Social (Human Rights)	Shareholder Proposal Regarding	Given their structural concerns with this proposal, as well as the Company's robust disclosures, policies, and actions with regard to		Aviva consider it essential that Nestlé improve the health and nutrition of their products.

Fund	Company	Size of fund holding (%)	Date	How the manager voted	Trustees' Engagement Priority Theme	Summary of the Resolution	Rationale for the Manager vote	Final outcome	Relevant next steps
						Sales of Healthier and Less Healthy Foods	the nutritional content of its products, Aviva do not believe that support for this proposal would benefit shareholders at this time.		However, they do not believe the resolution as framed is the most effective way of working with Nestlé management to improve the health of their products. Aviva are particularly concerned about the resolution's aim to enforce a binding change to the company's Articles of Association. They consider it important that Nestlé is given the flexibility to set an appropriate strategy in line with its ambitions that can accommodate new and emerging evidence on best practice. They also think it is important that any such target and reference point concerning proportional sales figures is benchmarked appropriately. Aviva consider that amending the company's Articles of Association would be micromanaging the approach that Nestlé takes to achieve this. They will reach out to Nestlé to let them know about their reservations and to ask for further details on this matter.
LGIM Future World Global Equity Index	Apple Inc.	4.63%	28/02 /2024	Against	Social and Governance (DE&I)	Report on Risks of Omitting Viewpoint and Ideological Diversity from EEO Policy	A vote against this proposal is warranted, as the company appears to be providing shareholders with sufficient disclosure around its diversity and inclusion efforts and non-discrimination policies, and		LGIM will continue to engage with the company, publicly advocate for their position on this issue and monitor company and market-level progress.

Fund	Company	Size of fund holding (%)	Date	How the manager voted	Trustees' Engagement Priority Theme	Summary of the Resolution	Rationale for the Manager vote	Final outcome	Relevant next steps
							including viewpoint and ideology in EEO policies does not appear to be a standard industry practice.		
LGIM Ethical UK Equity Index	Unilever Plc	5.64%	01/05 /2024	For	Environmental (Climate Change)	Approve Climate Transition Action Plan	A vote for the CTAP is applied as Aviva understand it to meet LGIM's minimum expectations. This includes the disclosure of scope 1, 2 and material scope 3 GHG emissions and short, medium and long-term GHG emissions reduction targets consistent with a 1.5°C Paris goal. Despite the SBTi recently removing their approval of the company long-term scope 3 target, Aviva note that the company has recently submitted near term 1.5 degree aligned scope 3 targets to the SBTi for validation and therefore at this stage believe the company's ambition level to be adequate. They therefore remain supportive of the net zero trajectory of the company at this stage.		LGIM will continue to engage with the company, publicly advocate for their position on this issue and monitor company and market-level progress.
BNY Mellon Real Return	Shell Plc	1.76%	21/05 /2024	Against	Environmental (Climate Change)	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	BNY Mellon did not support a shareholder proposal for a report on GHG (greenhouse gas) emission-reduction targets aligned with the Paris Agreement as BNY believed the company has disclosed enough information for shareholders to assess the related risks. Moreover, the company has disclosed a partial Scope 3 target which is considered an appropriate response to the proponent's asks.		While BNY Mellon do find some merits to the proponent's asks and legitimate concerns, aligning Scope 3 targets at Shell to a 1.5 degree scenario would mean a significant loss of customers to competitors. Such a decision is best in the hands of management, and the disclosure of a partial Scope 3 target shows some responsiveness from the company to our concerns, tackling mainly the emissions it directly has control

Fund	Company	Size of fund holding (%)	Date	How the manager voted	Trustees' Engagement Priority Theme	Summary of the Resolution	Rationale for the Manager vote	Final outcome	Relevant next steps
						the Goal of the Paris Climate Agreement			of. Shareholders have signalled a significant buy-in to management's strategy.
Schroders Intermediate Diversified Growth	Alphabet Inc	1.00%	07/06 /2024	Against	Social (Human Rights)	Shareholder Proposal Regarding Human Rights Impact Assessment of AI-Driven Targeted Advertising	Given the global influence of the company Schroders believe that the company should be held to the highest standards in regard to how it manages human rights across all parts of its business. A third-party assessment of this issue would help the company to identify gaps in its policies and processes which could be leaving the company open to financial and reputational risks. Schroders believe that how they have voted is in the best financial interest of their clients' investments.		Schroders will continue to engage with the company, publicly advocate for their position on this matter and monitor the company.

Source: Aviva, managers as at 31 December 2024.