

Implementation Statement (“IS”)

Biffa Pension Scheme (the “Scheme”)

Scheme Year: 1 April 2024 to 31 March 2025

The purpose of the Implementation Statement is for us, the Trustee of the Biffa Pension Scheme, to explain what we have done during the year ending 31 March 2025 (“the Scheme Year”) to achieve certain policies and objectives set out in the Statement of Investment Principles (“SIP”).

It includes:

1. A summary of any review and changes made to the SIP over the year;
2. How our policies in the SIP have been followed during the year; and
3. How we have exercised our voting rights, including the use of any proxy voting advisory services.

Our conclusion

Based on the activity we have undertaken during the Scheme Year, we believe that the policies set out in the SIP have been implemented effectively.

As our fiduciary investment manager¹, Aon Investments Limited (“AIL”) has collated the required and relevant information on voting behaviour and engagement activity from the underlying investment managers. The details are summarised in this statement.

We conclude that the activities completed by our managers align with our stewardship priorities, and that our voting policy has been implemented effectively in practice.

Review and changes to the SIP during the Scheme Year

The SIP was reviewed and updated over the Scheme Year, with changes effective from September 2024, to include the Trustee’s policy on the use of illiquid investments within the default investment strategy. The Scheme’s latest SIP can be found here:

<https://pensioninformation.aon.com/biffa/FileViewer.aspx?FileID=14375&FileName=Biffa%20Pension%20Scheme%20DC%20SIP%20-%20September%202024.pdf>

¹ We use the term ‘fiduciary investment manager’ to indicate that AIL has the discretion to implement changes to the underlying investments, in accordance with the broad policies agreed by the Trustee.

Evidence on how the Trustee has met its SIP objectives and policies

The Trustee outlines in its latest SIP a number of key objectives and policies. These are noted below together with an explanation of how these objectives have been met and policies adhered to over the course of the year:

The Trustee's key aim is to provide a range of investments that are suitable for meeting members' needs taking into account members' circumstances, in particular the range of members' attitudes to risk and term to retirement.

The Trustee provides members with a wide range of investment options covering the main asset classes. *UKW MP members with benefits accrued before April 1997 have an underpin which applies to these benefits and as such, they are required to take their 'pre97' funds as an annuity from the Scheme. For this reason, the only investment option available for these members (for all funds) is the Aon Managed Retirement Pathway to Annuity strategy.*

Members who do not wish to take an active role in managing their investment choices, or are restricted in their choice, will be invested in a default strategy. The default strategy that a member is invested in is dependent on their term to retirement and the category they belong to (thereby aiming to meet members' likely needs).

During the growth phase, the default strategy for all members is the Aon Managed Retirement Pathway to Drawdown. The Cash and Annuity strategies are only available in the lead up to retirement, with new vintages of those Target Date Funds being launched around seven years in advance of the target retirement date window. All members are therefore invested in the Retirement Pathway to Drawdown strategy during the growth phase.

Members will remain in the Drawdown strategy in the approach to retirement, unless they are in one of the categories of membership who will be moved to the Annuity or Cash strategies, or the member has made an alternative selection of strategy or funds.

Each of the Aon Managed Retirement Pathway Fund strategies provides an asset allocation strategy which automatically changes the funds members are invested in depending on the length of time until their selected retirement date. As members get closer to retirement, their savings are gradually moved out of growth-seeking assets and into capital preservation assets in preparation for their pension investments providing pension benefits at their retirement date.

The aim of the asset allocation strategies is to provide members with the potential for higher levels of growth during the accumulation of their retirement savings and then to gradually diversify their investments in the years approaching retirement, to reduce volatility and provide a broad base of assets from which members can choose the type of benefits they wish to take.

During the Scheme Year each of the Aon Managed Retirement Pathway Fund strategies initially invested in the Aon Managed Initial Growth Phase Fund and Aon Managed Global Impact Fund until around fifteen years before a member's selected retirement age. During this 'growth' phase, the Aon Managed Retirement Pathway strategies aim to provide real growth (in excess of inflation) over the long term.

From approximately fifteen years from a member's selected retirement age, investments that are expected to have lower volatility are gradually introduced.

At a member's selected retirement date, the Aon Managed Retirement Pathway strategies invest members' assets across a range of asset classes appropriate for the relevant choice of retirement target (i.e. annuity, drawdown or cash).

Under fiduciary mandates managed by AIL, AIL sets, monitors and reviews the strategy and performance of the Aon Managed Retirement Pathway Funds on a regular basis.

	<p>In order to assess the continued appropriateness of the Aon Managed Retirement Pathway strategies, the Trustee, via their investment adviser, carries out a triennial investment strategy review. The last review was undertaken during 2023. It included membership analysis and gave an in-depth review of the Aon Managed Retirement Pathway strategies.</p>
<p>The Trustee regularly reviews the appropriateness of the three asset allocation strategies and may make changes from time to time, advising members of any changes.</p>	<p>The conclusion was that the default investment strategies remained appropriate for the majority of Scheme members and that the default investment strategies were expected to provide an adequate level of investment return, in order to meet the reasonable expectations of members of the Scheme in relation to their retirement benefits.</p> <p>There were no changes made to the available fund range. The next strategy review is due by 22 November 2026.</p>
<p>The Trustee manages risk by reviewing the range of funds offered and the suitability of the Retirement Pathway options at least triennially.</p>	<p>Investment monitoring takes place on a quarterly basis with monitoring reports provided to the Trustee by AIL. The investment reports include performance reporting on all of the investment funds relative to their respective benchmarks or targets and performance commentary which highlights key factors affecting the performance of the funds over the quarter. These reports also contain any updates on changes to the funds made by the fiduciary investment manager, AIL, over the quarter. Any issues with the underlying asset managers' investment strategy, including the ESG assessment, are flagged.</p>
<p>The Trustee considers these risks in a qualitative rather than quantitative manner as part of each formal strategy review.</p>	<p>During the Scheme Year, the Trustee discussed the risks of market fluctuations and inflation eroding members' spending power in retirement with AIL. The Aon Managed Retirement Pathway Fund series outperformed against the inflation linked objectives over the longer 'since inception' and five-year periods for members in the growth (15+ years from retirement) and pre-retirement phase (<15 years from retirement). For members at retirement, returns were broadly in line with inflation linked objectives. Although the strategy underperformed inflation linked objectives over the three-year period, it was noted this was primarily due to the historically high inflation rates witnessed over this period. Funds and the underlying investment managers continued to perform as expected in the market environment and no significant concerns were raised regarding the investment strategy over the Scheme Year.</p>
<p>The Trustee will review from time to time the underlying investment managers' principles and how these have been applied in exercising voting rights.</p>	<p>Under the Trustee's fiduciary mandate managed by AIL, AIL appoints the underlying investment managers. Prior to appointing any underlying investment manager, AIL will carry out extensive due diligence on behalf of the Trustee to ensure risks to members relating to fraud, acts of negligence and provider failure are minimised. As part of the manager selection process AIL considers the manager's stewardship policies and behaviours. Further, this is considered as part of ongoing investment governance protocols. More information on AIL's approach to the exercise of voting rights and stewardship is set out later in this statement.</p>

Voting, engagement, and stewardship

How the Trustee's expectations regarding voting and engagement have been implemented

The Scheme is invested entirely in pooled funds, and so the responsibility for voting and engagement is delegated to the Scheme's fiduciary investment manager, AIL. AIL invests the Scheme's assets in a range of funds including the default strategies and wider range of self-select funds. AIL selects the underlying investment managers to achieve the objective of each fund on behalf of the Trustee.

Each year, the Trustee review the voting and engagement policies of AIL to ensure they align with our own policies for the Scheme and help us to achieve them.

The Trustee reviewed the stewardship activity carried out over the year by the material underlying investment managers, and, in our view, all were able to disclose adequate evidence of voting and / or engagement activity. More information on the stewardship activity carried out by AIL and the underlying investment managers can be found in the following sections.

Over the Scheme Year, the Trustee monitored the performance of the Scheme's investments on a quarterly basis and received updates on important issues from our investment manager.

What is stewardship?

Stewardship is investors using their influence over current or potential investees/issuers, policy makers, service providers and other stakeholders to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society.

This includes prioritising which ESG issues to focus on, engaging with investees/issuers, and exercising voting rights.

Differing ownership structures means stewardship practices often differ between asset classes.

Source: UN PRI

AIL's engagement activity

Engagement is when an investor communicates with current (or potential) investee companies or asset managers (as owners of companies) to improve their ESG practices, sustainability outcomes or public disclosure. Good engagement identifies relevant ESG issues, sets objectives, tracks results, maps escalation strategies and incorporates findings into investment decision-making.

Over the year, AIL held several engagement meetings with many of the underlying asset managers in its strategies. AIL discussed ESG integration, stewardship, climate, biodiversity and modern slavery with the asset managers. AIL provided feedback to the managers after these meetings with the aim of improving the standard of ESG integration across its portfolios.

To support these engagements, AIL maintains a set of stewardship priorities which align with their responsible investing beliefs. These priorities focus on investment stewardship, climate change transition and nature loss, combatting modern slavery and Artificial Intelligence. A summary of these priorities is provided in appendix 1.

Over the year, AIL engaged with the industry through white papers, working groups, webinars and network events, as well as responding to multiple consultations.

AIL successfully renewed its signatory status to the 2020 UK Stewardship Code. This is a voluntary code established by the Financial Reporting Council that sets high standards on stewardship for asset owners, investment managers and service providers.

Underlying managers' voting activity – Equity, real asset and multi-asset funds

Good asset stewardship means being aware and active on voting issues, corporate actions and other responsibilities tied to owning a company's stock.

We believe that good asset stewardship is in members' best interests by promoting best practice and encouraging investee companies to access opportunities, manage risk appropriately and protect shareholders' interests.

Understanding and monitoring the stewardship that investment managers practice in relation to the Scheme's investments is an important factor in deciding whether a manager remains the right choice for the arrangement.

Voting rights are attached to listed equity shares, including equities held in multi-asset funds. We expect the Scheme's equity-owning investment managers to responsibly exercise their voting rights. Over the year, the material equity, real asset and multi-asset investments held by the Scheme within the default strategies and wider self-select fund range were as set out on the following pages:

Why is voting important?

Voting is an essential tool for listed equity investors to communicate their views to a company and input into key business decisions. Resolutions proposed by shareholders increasingly relate to social and environmental issues.

Source: UN PRI

Aon Managed Retirement Pathway Funds

Aon Managed Fund

Underlying managers (equity-owning only)

Aon Managed Global Impact Fund	Baillie Gifford, Mirova, Nordea
Aon Managed Initial Growth Phase Fund	Equities: LGIM, UBS Listed real assets: BlackRock, LGIM
Aon Managed Diversified Asset Fund	LGIM, UBS

Source: Aon Investments Limited

Self-select fund range

Aon Managed Fund

Underlying managers (equity-owning only)

Aon Managed Global Equity Fund	LGIM, UBS
Aon Managed Diversified Multi-Asset Fund	LGIM, UBS
BlackRock UK Equity Index Fund	BlackRock
LGIM FTSE4GOOD Developed Equity Index Fund	LGIM

Source: Aon Investments Limited

Voting statistics: Aon Managed Retirement Pathway Funds

The table below shows the voting statistics for each of the material funds held within the default strategies, the Aon Managed Retirement Pathway Funds, for the year to 31 March 2025. We also provide a combined view for a member 30 years from retirement and at retirement, invested in the Aon Managed Retirement Pathway Funds.

Aon Managed Retirement Pathway Funds

Aon Managed Funds	% Proposals Voted	% votes cast against management	% votes abstained
Aon Managed Initial Growth Phase Fund ^{1,2}	94.5%	12.4%	0.6%
Aon Managed Global Impact Fund	96.7%	21.3%	0.9%
Aon Managed Diversified Asset Fund ¹	95.8%	14.6%	0.7%
Aon Managed Retirement Pathway Funds			
<i>Member 30 years from retirement¹</i>	94.7%	13.3%	0.6%
<i>Member at retirement¹</i>	95.2%	13.9%	0.6%

Source: Aon Investments Limited, Underlying investment managers.

¹ Figures shown only reflect the proportion of the portfolio with equity-voting rights.

² Invests 90% in the Aon Managed Global Equity Fund and 10% in property and infrastructure.

Voting statistics: self-select funds

The table below shows the voting statistics for each of the material funds offered within the wider self-select fund range available for the year to 31 March 2025.

Self-select fund range

Aon Managed Funds	% Proposals Voted	% votes cast against management	% votes abstained
Aon Managed Global Equity Fund	94.9%	12.9%	0.6%
Aon Managed Diversified Asset Fund ¹	95.8%	14.6%	0.7%
BlackRock UK Equity Index Fund	99.4%	2.4%	0.1%
LGIM FTSE4GOOD Developed Equity Index Fund	99.6%	17.5%	0.3%

Source: Aon Investments Limited, underlying investment managers.

¹ Please note figures shown only reflect the proportion of the portfolio with equity-voting rights.

Use of proxy voting advisors

Many investment managers use proxy voting advisors to help them fulfil their stewardship duties. Proxy voting advisors provide recommendations to institutional investors on how to vote at shareholder meetings on issues such as climate change, executive pay and board composition. They can also provide voting execution, research, record keeping and other services.

Responsible investors will dedicate time and resources towards making their own informed decisions, rather than solely relying on their adviser's recommendations. The table below describes how the Scheme's underlying investment managers use proxy voting advisors.

Manager	Description of use of proxy voting
Baillie Gifford	Whilst Baillie Gifford is cognisant of proxy advisers' voting recommendations (Institutional Shareholder Services (ISS) and Glass Lewis), it does not delegate or outsource any of its stewardship activities or follow or rely upon ISS's recommendations when deciding how to vote on its clients' shares. All client voting decisions are made in-house. Baillie Gifford votes in line with its in-house policy and not with the proxy voting providers' policies. Baillie Gifford also has specialist proxy advisors in the Chinese and Indian markets to provide it with more nuanced market specific information.
BlackRock	BlackRock uses ISS's electronic platform to execute its vote instructions, manage client accounts in relation to voting and facilitate client reporting on voting. In certain markets, BlackRock works with proxy research firms who apply its proxy voting guidelines to filter out routine or non-contentious proposals and refer to BlackRock any meetings where additional research and possibly engagement might be required to inform its voting decision.
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 it does not outsource any part of the strategic decisions. To ensure LGIM's proxy provider votes in accordance with LGIM's position on ESG, LGIM has put in place a custom voting policy with specific voting instructions.
Mirova	Mirova uses ISS as a voting platform for related services such as ballot collecting, vote processing and record keeping. Mirova subscribes to the ISS research, however its recommendation is not prescriptive or determinative to Mirova's voting decisions. All voting decisions are made by Mirova in accordance with its Voting Policy.
Nordea	Nordea uses two external proxy advisors ISS and Glass Lewis. ISS is used for proxy voting, execution as well as research, while Glass Lewis is mainly used for research. Nordea evaluate Nordea's proxy advisors regularly on operational integrity, quality of research and the implementation of the custom voting policy.
UBS	UBS Asset Management retains the services of ISS for the physical exercise of voting rights and for supporting voting research. UBS retain full discretion when determining how to vote at shareholder meetings.

Source: Aon Investments Limited. Underlying managers








Significant voting activity

To illustrate the voting activity being carried out on our behalf, we asked AIL to provide a selection of what the underlying investment managers consider to be the most significant votes in relation to the Scheme's funds. A sample of these significant votes can be found in appendix 2 for the main funds used within the default strategies.

Engagement Activity - Aon Managed Retirement Pathway Funds

Below we provide examples of some of the engagement activity carried out by the underlying investment managers for the default strategies and the most material self-select funds. The managers have provided information for the most recent calendar year available (1 January 2024 to 31 December 2024). Some of the information provided is at a firm level i.e., is not necessarily specific to the underlying fund invested in by the Aon Managed Retirement Pathway Funds.

All managers engaged across all key themes. We would expect this to be the case, as all underlying managers meet AIL's required standards for consideration of ESG factors / risks. The key themes engaged on are shown in the below table:

Themes engaged on at a firm level						
Environment - Climate Risk Management	Environment - Biodiversity	Governance - Remuneration	Governance - Board Effectiveness	Governance - Corporate Strategy	Social - Human Capital	Social - Risks & Opportunities
						

Source: Aon Investment Limited, Underlying managers

Engagement Activity – Wider fund range

Below we provide examples of some of the engagement activity carried out by the underlying investment managers for the most material self-select funds. The managers have provided information for the most recent calendar year available (1 January 2024 to 31 December 2024). Some of the information provided is at a firm level i.e., is not necessarily specific to the underlying fund.

We also provide examples of specific engagement activity carried out by the most material underlying investment managers below.

UBS engagement with BHP Group

Over 2024, UBS engaged with BHP Group. They met three times in 2024, primarily focusing on the release of their new Climate Transition Action Plan (CTAP).

BHP Group are a leading producer of iron ore, copper and metallurgical coal. The company is a significant carbon emitter but a key enabler of the energy transition. In 2024, UBS met with the CFO, participated in their group investor engagement sessions and had bilateral discussions with BHP Group in the lead up to and after the release of the new CTAP.

The focus was on Scope 3 emissions, physical risk and scenario analysis use for transition planning. UBS requested further disclosure on its Scope 3 emissions, given 97% of their total emissions are Scope 3. UBS also requested an update on Paris alignment scenarios the company uses to set strategies. Due to the speed of the transition expected to influence the demand for key minerals, and be a key driver of the sector's performance, UBS believed this is important to report on.

In their new CTAP, BHP enhanced their Scope 3 strategy disclosures, including their view on steelmaking technologies and pipeline of abatement projects. BHP have also provided an initial framing of their assessment process on physical risk and further assessments are underway. UBS will continue to engage in 2025, focusing on the lack of clarity on outlook for metallurgical coal and the scale of expected use of offsets in BHP's net zero target.

LGIM engagement with Walmart Inc

Over 2024, LGIM engaged with Walmart Inc, an American multinational retail corporation that operates a chain of hypermarkets, discount department stores and grocery stores.

LGIM contacted Walmart in relation to establishing a company compensation policy of paying a living wage and have been engaging with them on the topic for several years. In 2023, LGIM launched their income inequality engagement campaign, targeting 15 of the largest global food retailers, which Walmart is a part of. LGIM voted for this policy, where they have been encouraging Walmart to establish a compensation policy that ensures employees earn a living wage, to reduce potential negative financial impacts that stem from low worker morale, poor health or high staff turnover.

Over 2024 LGIM held a series of engagement meetings with Walmart. While the company has improved on some areas, in terms of training opportunities, the company does not have a policy in place yet and still pays employees under the living wage. LGIM continue to engage with Walmart and publicly advocate their position on this issue.

Engagement Activity - Non-equities

While equity managers may have more direct influence on the companies they invest in, managers investing in asset classes such as fixed income and alternatives are also increasingly influential in their ability to encourage positive change.

The Aon Managed Retirement Pathway Funds and several of the wider self-select fund options include investment in non-equity assets. This might include fixed income, cash, direct property and alternatives such as gold, depending on the fund. Below we describe examples of engagement.

Fixed Income

The Aon Managed Retirement Pathway Funds and several of the wider self-select fund options invested in fixed income and cash over the year. The above engagement activities carried out by LGIM and UBS are also applicable for the multi asset and fixed income funds.

Direct Property

The Aon Managed Retirement Pathway Funds invested in direct property over the year.

The Trustee appreciates that engagement activities within the direct property fund may be limited in comparison to other asset classes, such as equity and fixed income. Nonetheless, the Trustee expects ESG engagement to be integrated in its managers' investment approaches.

The direct property manager, Threadneedle, is a signatory of the UN PRI and has adopted ESG policies across its investments. Threadneedle's UK direct property funds are managed in line with their UK Real Estate ESG Policy Statement. Threadneedle takes an approach to real estate whereby it strives to understand the risks posed within the asset class and focus on mitigating these during the lifecycle of the projects. This can be done through property management, refurbishment, building improvements and strategic asset management.

Key topics of engagement during the year include the energy efficiency of assets, low carbon development opportunities, tenant engagement and Net Zero initiatives. During the 12 months to 31 March 2025, Threadneedle completed a range of projects designed to improve the energy efficiency of the underlying assets.

Commodities

The Aon Managed Retirement Pathway Funds and Aon Managed Diversified Multi Asset Fund invested in commodities over the year.

The BlackRock Gold Fund provides exposure to gold via an exchange traded fund (ETF). The main ESG consideration relates to how the gold is sourced. The London Bullion Market Association (LBMA) has established standards on the trade of gold and silver; these specify the requirements that refiners, and their gold, must meet to be accepted for trading. The refiners that source the gold that backs the BlackRock fund align to those standards.

Data limitations

At the time of writing, LGIM and BlackRock did provide fund level engagement information but not in line with the best practice industry standard Investment Consultants Sustainability Working Group (“ICSWG”) reporting guide.

Appendix 1 – AIL’s Stewardship priorities

AIL has set stewardship priorities that align with its beliefs in relation to responsible investment.

These stewardship priorities focus on climate change and nature loss, modern slavery and artificial intelligence, as well as ensuring strong governance. These priorities have been identified as financially material risks that have the potential to impact the value of members’ investments.

To support these priorities, AIL has an Engagement Programme through which it engages, identifies and analyses key areas for focus. In turn, AIL also has a set of expectations for its underlying investment managers.

A summary of these priorities is set out below:

Investment Stewardship

It is important to be clear on our principles and expectations of good investment stewardship across asset classes. AIL does this through its ongoing engagements with the underlying investment managers and is looking for strong alignment between an investment manager’s responsible investment policies and its engagement activity and voting decisions. AIL believes that transparency of engagement and voting activity is key and actively engages with its investment managers to promote transparency. AIL also engages with its underlying investment managers to promote the Principles for Responsible Investment, adherence to the UK Stewardship Code as well as following industry best practice.

Climate transition and nature loss

Climate change and the progress towards net zero is a key area of focus for the Trustee and its investment manager, recognising the impact of climate-related risks on the value of members savings over the long term. AIL looks for alignment between an investment manager’s climate risk policy (or stated ambitions) and its responsible investment approach including engagement activities and voting decisions around climate. AIL engages with its underlying investment managers to monitor progress in the underlying investee companies towards setting targets and ensuring meaningful action as a result.

AIL also believes that biodiversity risk, including nature loss, is intrinsically linked to climate-change and hence the value of members savings over the long term. AIL collaborated with the Cambridge Institute of Sustainability Leadership to create a framework for assessing nature-related risks including a due diligence questionnaire to measure progress on goals. AIL engages with its underlying investment managers to understand the risks in this area and ensure appropriate action is taken as a result.

Combatting modern slavery

AIL is a signatory of the ‘Find It, Fix It, Prevent It’ initiative which aims to combat modern slavery through engagement with investee companies, participation in shaping public policy and in developing better modern slavery data. Through this initiative AIL aims to raise awareness of the role investors can play in addressing modern slavery in supply chains. AIL engages with its investment managers to understand where any potential exposure exists and ensure appropriate action is taken as a result.

Artificial Intelligence (AI)

AI is a nascent industry, and its real world applications are yet to be fully explored. AIL has made AI an important topic for its engagement programme and endeavours to be at the forefront of this fast-developing area. AIL believes in the responsible use of AI. To effect this, AIL will promote transparency and explainability and appropriate guards against bias. Where AI is adopted, AIL will endeavour to engage with its investment managers to ensure this is done in a way that incorporates responsible design, and that the energy intensive nature of AI balances appropriately with Net Zero commitments.

Appendix 2 – Significant Voting Examples

In the table below are some significant vote examples provided by the underlying investment managers appointed by AIL and used within the Aon Managed Retirement Pathway Funds.

We consider a significant vote to be one which the underlying manager deems to be significant. Managers use a wide variety of criteria to determine what they consider a significant vote, some of which are outlined in the examples below.

Aon Managed Initial Growth Phase Fund - LGIM	Company name	ConocoPhillips
	Date of vote	May 2024
	Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio of the underlying fund)	0.4%
	Summary of the resolution	Resolution 5: Revisit Pay Incentives for GHG Emission Reductions
	How the manager voted	Against management
	Did the manager communicate its intent to the company ahead of the vote?	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is LGIM's policy not to engage with its investee companies in the three weeks prior to an AGM as its engagement is not limited to shareholder meeting topics.
	Rationale for the voting decision	Shareholder Resolution - Climate change: A vote against is applied as LGIM expects companies to be taking sufficient action on the key issue of climate change.
	Outcome of the vote	Fail
	Implications of the outcome	LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.
	On which criteria is the vote considered significant?	Pre-declaration and High-Profile Meeting: This shareholder resolution is considered significant due to misleading proposals (shareholder resolutions brought with the aim of undermining positive environmental, social and governance behaviours) are a relatively recent phenomenon. Such proposals often appear to be supportive of, for example, the energy transition but, when considered in depth, are actually designed to promote anti-climate change views.

Aon Managed Initial Growth Phase Fund - UBS	Company name	Shell Plc
	Date of vote	May 2024
	Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio of the underlying fund)	Not disclosed
	Summary of the resolution	Align medium-term emissions reduction targets covering the GHG emissions of the use of its energy products (scope 3) with the goal of the Paris Climate Agreement.
	How the manager voted	Against management
	Did the manager communicate its intent to the company ahead of the vote?	No
	Rationale for the voting decision	<p>Shell has made incremental progress in this area since the previous year (when UBS supported the proposal), including introducing an absolute Scope 3 emissions target for their oil products. While the new target is not perfect, it is a sign of momentum in a positive direction, specifically in the area the proponent is focused on in this request.</p> <p>In UBS's view it would be necessary for Shell to divest a higher level of assets than is currently in investor interests in order to achieve an expanded Scope 3 target.</p> <p>With a say on climate vote on the ballot, UBS feels the best way to voice its concerns on the overall transition plan in our vote is on this resolution. This allows UBS to evaluate the entire plan and recognise where Shell may fall short of expectations, rather than in one specific component of the plan, which this proposal focuses on.</p>
	Outcome of the vote	Fail
	Implications of the outcome	UBS will continue to engage with Shell as part of its Climate Engagement Programme.

	On which criteria is the vote considered significant?	Aggregate percentage of votes in support of shareholder resolution exceeded 18% of votes cast.
Aon Managed Global Impact Fund - Nordea	Company name	ANSYS, Inc.
	Date of vote	June 2024
	Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio of the underlying fund)	1.9%
	Summary of the resolution	Provide right to call a special meeting.
	How the manager voted	Against management. For the shareholder proposal.
	Did the manager communicate its intent to the company ahead of the vote?	No.
	Rationale for the voting decision	Nordea thinks that each company should grant holders of a specific proportion of the outstanding shares of a company, no greater than ten per cent (10%), the right to convene a meeting of shareholders for the purpose of transacting the legitimate business of the company. In Nordea's view, this shareholder proposal requesting the company to take the necessary steps to afford shareholders the right to call a special meeting, would improve shareholder rights.
	Outcome of the vote	Pass
	Implications of the outcome	The protection of shareholder rights is an essential requirement for minority shareholders in a listed company. Nordea will continue to vote for such proposals in other relevant companies.
	On which criteria is the vote considered significant?	Significant votes are those that are severely against Nordea's principles, and where Nordea feels it needs to enact change in the company.
Aon Managed Global Impact Fund - Mirova	Company name	Unilever Plc
	Date of vote	May 2024

	Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio of the underlying fund)	<i>Not provided</i>
	Summary of the resolution	Say on climate
	How the manager voted	Supported management
	Did the manager communicate its intent to the company ahead of the vote?	Yes
	Rationale for the voting decision	The sector dedicated ESG analyst thoroughly reviewed the proposed transition plan. While there is room for improvement noted, on balance, Mirova was satisfied with the current proposal.
	Outcome of the vote	Pass
	Implications of the outcome	While concerns remain regarding governance of sustainability, Mirova will leverage engagement to push the company to further improve the climate transition target setting and provide meaningful progress reports.
	On which criteria is the vote considered significant?	Relevant to engagement strategy regarding governance of sustainability.

Source: Aon Investments Limited, Underlying Managers (LGIM, UBS, Mirova, Nordea).