

Engagement Policy Implementation Statement (“EPIS”)

Goodyear Dunlop Tyres UK Limited Pension Plan (the “Plan”)

Plan Year End – 5 April 2025

The purpose of the EPIS is for us, the Trustee of the Goodyear Dunlop Tyres UK Limited Pension Plan, to explain what we have done during the year ending 5 April 2025 to achieve certain policies and objectives set out in the Statement of Investment Principles (“SIP”). It includes:

1. How our policies in the SIP about asset stewardship (including both voting and engagement activity) in relation to the Plan’s investments have been followed during the year; and
2. How we have exercised our voting rights or how these rights have been exercised on our behalf, including the use of any proxy voting advisory services, and the ‘most significant’ votes cast over the reporting year.

Our conclusion

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

In our view, the Plan’s material investment managers were able to disclose good evidence of engagement activity, and the activities completed by our managers align with our stewardship expectations.

We delegate the management of the Plan’s return-seeking assets to Aon Investments Limited (“Aon”). In turn, Aon invests in a range of “best in class” underlying managers. We believe the activities completed by Aon to review the underlying managers’ voting and engagement policies, and activities align with our stewardship expectations. The Plan does not invest in equities and so does not have any voting responsibilities.

How engagement policies have been followed

The Plan return-seeking assets are invested in pooled funds, and so the responsibility for engagement is delegated to the Plan's investment managers, which is in line with the policies set out in our SIP. We reviewed the stewardship activity of the material investment managers carried out over the Plan year and in our view, the investment managers were able to disclose good evidence of engagement activity. More information on the stewardship activity carried out by the Plan's investment managers can be found in the following sections of this report.

Over the reporting year, we monitored the performance of the Plan's investments on a quarterly basis and received updates on important issues from our investment adviser, Aon. In particular, we received quarterly ESG ratings from Aon for the underlying funds the Plan is invested in, where available. All the Plan's funds which have been rated are rated 'Integrated' or 'Advanced'. An integrated rating means that the fund management team has taken appropriate steps to identify, evaluate and mitigate potential financially material ESG risks within the fund's investment portfolio. An Advanced rating means that the fund management team has demonstrated that it has more advanced processes in place. Ratings are reviewed quarterly to reflect any changes in the level of ESG integration or broader responsible investment developments.

Our climate change report for the year ended 5 April 2024 was published during the year, in line with the TCFD recommendations.

The report can be found here:

[Goodyear Dunlop Tyres UK Ltd Pension Plan – TCFD Disclosure](#)

The Plan's stewardship policy can be found in the SIP:

[Goodyear Dunlop Tyres UK Ltd Pension Plan \(aon.com\)](#)

The SIP demonstrates that,

- We recognise the importance of our role as a steward of capital and the need to encourage the highest standards of governance and promotion of corporate responsibility in the underlying companies and assets in which the Plan invests, as this ultimately creates long-term financial value for the Plan and its beneficiaries.
- We annually review the stewardship activity of our managers to ensure our stewardship policy is being appropriately implemented in practice.
- We will engage with our investment managers as necessary for more information, to ensure that robust active ownership behaviours, reflective of our active ownership policies, is being actioned.

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 Environmental, Social, Governance ("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

Our managers' engagement activity

We invest the Plan's return-seeking assets in Aon's Active Global Fixed Income Strategy (Adept Strategy 2 Fund). This is a fund of funds arrangement, where Aon selects the underlying investment managers on our behalf.

We delegate monitoring of ESG integration and stewardship of the underlying managers to Aon. We have reviewed Aon's latest annual Stewardship Report and we believe it shows that Aon is using its resources to effectively influence positive outcomes in the funds in which it invests.

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

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

Aon has a net zero commitment to deliver UK delegated investment portfolios and default strategies which have a net zero carbon emissions profile by 2050.

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

Our managers' engagement activity

Engagement is when an investor communicates with current (or potential) investee companies (or issuers) 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.

The table below shows some of the engagement activity carried out by the Plan's material investment managers. The managers have provided information for the most recent calendar year available.

Funds	Number of engagements		Themes engaged on at a fund level
	Fund level	Firm level	
Aegon Asset Management (“Aegon”) – European Asset Backed Securities (“ABS”) Fund	115	422	Environment – Climate Change Social – Human and Labour Rights; Public Health Governance – Financial and Reporting - Reporting (e.g. audit, accounting, sustainability reporting) Other – General Disclosure
M&G Investments (“M&G”) – Sustainable Total Return Credit Investment Fund	12	406	Environment – Net Zero/Decarbonisation; Nature and Biodiversity; Climate Change; Climate Action 100+ Specific Engagements Social – Diversity & Inclusion

Source: *Investment managers*

Data limitations

This report does not include commentary on certain asset classes such as liability driven investments (via UK government bonds, also known as “gilts”) or cash because of the limited materiality of stewardship to these asset classes. Further, this report does not include the additional voluntary contributions (“AVCs”) due to the relatively small proportion of the Plan’s assets that are held as AVCs.