Halcyon Business Solutions Pension Scheme Implementation Statement for the year ended 31st January 2025

Purpose

This Implementation Statement provides information on how, and the extent to which, the Trustee of the Halcyon Business Solutions Pension Scheme ("the Scheme") has followed its policy in relation to the exercising of rights (including voting rights) attached to the Scheme's investments, and engagement activities during the year ended 31st January 2025 ("the reporting year"). In addition, the statement provides a summary of the voting behaviour and most significant votes cast by the underlying investment managers during the reporting year.

Background

The Trustee's policy on Environmental, Social and Governance ("ESG") and voting issues is documented in the Statement of Investment Principles dated May 2025. As at the date of the accounts, the Statement of Investment Principles in places was dated July 2023, and the Trustee's policy on the above was documented in this.

The Trustee's policy

The Trustee believes that there can be financially material risks relating to ESG.

The Trustee will take its views on ESG factors into account in any future Investment Manager Selection exercises for the underlying investments that the Scheme makes. The Trustee recognises that the extent to which ESG factors can be material may depend on the asset class being invested in.

The Trustee will monitor the ESG integration practices of the managers they are invested in using the research capability of its Investment Consultant. The Trustee receives regular reporting on its Investment Managers which considers ESG factors. The Trustee will take ESG factors into account when deciding whether to retain or remove an individual manager.

Recognising that the Trustee uses pooled funds, it has delegated the ongoing monitoring and management of ESG risks in individual stocks to the Scheme's Investment Managers. The Trustee recognises that how, and the extent that, the Investment Managers do this will be dependent on the asset class characteristics.

It has also delegated responsibility for the exercise of rights (including voting rights) attached to the Scheme's investments to the Investment Managers.

Manager selection exercises

During the reporting year, there were no manager selection exercises.

Ongoing governance

The Trustee has appointed XPS Investment Limited ("XPS IL") as its Investment Consultant. XPS IL's research department have regular and extensive interaction with the Scheme's investment managers including monitoring the processes and operational behaviour of the investment managers. This information is collated, and any developments are reported to the Trustee in the quarterly investment reports, if they arise.

As at the Scheme year end, the Scheme invested with five underlying investment managers:

- BlackRock - The Dynamic Diversified Growth Fund invests in a range of asset classes, including, equities, bonds and property. BlackRock regularly engage in voting activity in regard to the underlying equity holdings (further information below).
- Legal and General Investment Management Limited ("LGIM") - The LDI and gilt funds invest in UK government bonds and as such there is limited engagement given the bonds are issued by the UK government.
- The Allianz Global Multi Sector Credit Fund, Payden & Rygel Absolute Return Bond Fund and Insight High Grade ABS Fund invest in a variety of credit-based assets. There is no equity exposure in these funds and therefore the managers do not engage in voting activity, given the underlying bonds do not carry voting rights. However, all funds incorporate ESG considerations into their investment decision making to varying degrees (see below).

Post Scheme year end, the Scheme disinvested from the BlackRock Dynamic Diversified Growth Fund, the Allianz Global Multi Sector Credit Fund and the Payden & Rygel Absolute Return Bond Fund. These changes were implemented to move the Scheme towards a lower-risk investment strategy, aligning the portfolio with a typical insurer style strategy.

XPS engage with, and frequently monitor, all investment managers on an ongoing basis. During the period, no developments were noted.

The Trustee believes that its approach to, and policy on, ESG matters will evolve over time based on factors including developments within the industry. In particular, whilst the Trustee has not, to date, introduced specific stewardship priorities, it will monitor the results of those votes deemed by the managers to be most significant in order to determine whether specific priorities should be introduced and communicated to the managers.

Adherence to the Statement of Investment Principles

During the reporting year, the Trustee is satisfied that it followed its policy on the exercise of rights (including voting rights) and engagement activities to an acceptable degree. The Trustee observes that it would have had queries for BlackRock on its engagement and voting over the period regarding climate change matters but notes that as this aspect of the portfolio has already been disinvested, these queries are no longer relevant to the Scheme.

Voting activity

The main asset class where the investment managers will have voting rights is equities. Investments in equities will form part of the strategy through the BlackRock Dynamic Diversified Growth Fund in which the Scheme was invested in during the reporting year. Therefore, a summary of the voting behaviour and most significant votes cast by BlackRock is shown in the table below. This voting information has been provided by the investment managers.

The Trustee's view is that strong stewardship of the underlying companies in which the Scheme invests is important and the Trustee expects the Scheme's managers to exert influence to improve this through their voting activity and other measures. As the Scheme invests in pooled funds, the Trustee can therefore only influence the Scheme's managers rather than the underlying companies directly. The Trustee has selected significant votes on the basis they are linked to the Trustee's Policy which has a focus on matters including climate change and board stewardship, these being significant and material topics that are relevant to the Trustee's policy.

Where the manager has provided a selection of significant votes, the Trustee has reviewed the rationale for significant votes provided by the managers and are comfortable with the rationale provided, and that this is consistent with its policy. The Trustee, with the help of its Investment Consultant, has considered the information the Investment Managers have been able to provide on significant voting, and have deemed the below information as most relevant.

During the reporting year, the Scheme also held a proportion of its portfolio in fixed income funds managed by Allianz, LGIM, Payden & Rygel and Insight. These funds invest in various bond holdings which do not carry voting rights.

Based on this summary, the Trustee concludes that Blackrock have exercised their delegated voting rights on behalf of the Trustee in a way that aligns with the Trustee's relevant policies in this regard.

BlackRock Dynamic Diversified Growth Fund

Firm Level Voting Information Provided by BlackRock

Voting Information
BlackRock Dynamic Diversified Growth Fund
The manager voted on 94% of resolutions of which they were eligible out of 6,705 eligible votes.
Investment Manager Client Consultation Policy on Voting
BlackRock believes that companies are responsible for ensuring they have appropriate governance structures to serve the interests of shareholders and other key stakeholders. BlackRock believe that there are certain fundamental rights attached to shareholding. Companies and their boards should be accountable to shareholders and structured with appropriate checks and balances to ensure that they operate in shareholders' best interests to create sustainable value. Shareholders should have the right to vote to elect, remove, and nominate directors, approve the appointment of the auditor, and amend the corporate charter or by-laws. Consistent with these shareholder rights, BlackRock has a responsibility to monitor and provide feedback to companies, in their role as stewards of their clients' investments. BlackRock Investment Stewardship ("BIS") does this through engagement with management teams and/or board members on material business issues including environmental, social, and governance ("ESG") matters and, for those clients who have given BlackRock authority, through voting proxies in the best long-term economic interests of BlackRock's clients. BlackRock also participate in the public debate to shape global norms and industry standards with the goal of a policy framework consistent with BlackRock's clients' interests as long-term shareholders. BlackRock looks to companies to provide timely, accurate, and comprehensive reporting on all material governance and business matters, including ESG issues. This allows shareholders to appropriately understand and assess how relevant risks and opportunities are being effectively identified and managed. Where company reporting and disclosure is inadequate or the approach taken is inconsistent with BlackRock's view of what supports sustainable long-term value creation, BlackRock will engage with a company and/or use BlackRock's vote to encourage a change in practice. BlackRock views engagement as an important activity; engagement provides BlackRock with the opportunity to improve their understanding of the business and ESG risks and opportunities that are material to the companies in which BlackRock's clients invest. As long-term investors on behalf of clients, BlackRock seek to have regular and continuing dialogue with executives and board directors to advance sound governance and sustainable business practices, as well as to understand the effectiveness of the company's management and oversight of material issues. Engagement is an important mechanism for providing feedback on company practices and disclosures, particularly where BlackRock believe they could be enhanced. BlackRock primarily engage through direct dialogue but may use other tools such as written correspondence to share BlackRock's perspectives. Engagement also informs BlackRock's voting decisions.

BlackRock’s approach to corporate governance and stewardship is explained in BlackRock’s Global Principles. These high-level Principles are the framework for BlackRock’s more detailed, market-specific voting guidelines, all of which are published on the BlackRock website. The Principles describe BlackRock’s philosophy on stewardship (including how BlackRock monitor and engage with companies), BlackRock’s policy on voting, BlackRock’s integrated approach to stewardship matters and how BlackRock deal with conflicts of interest. These apply across relevant asset classes and products as permitted by investment strategies. BlackRock reviews their Global Principles annually and updates them as necessary to reflect market standards, evolving governance practice and insights gained from engagement over the prior year.

BlackRock’s Global Principles are available on their website at https://www.blackrock.com/corporate/literature/fact-sheet/blk-responsible-investment-engprinciples-global.pdf

Investment Manager Process to determine how to Vote

The 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 inform their vote decisions through research and engage as necessary. BlackRock’s 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 their regional engagement priorities based on issues that BlackRock believe could impact the long-term sustainable financial performance of companies in those markets. BlackRock welcome discussions with BlackRock’s 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’s 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’s 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 assess a company’s approach to corporate governance and the items on the agenda to be voted on at the shareholder meeting. BlackRock apply their guidelines pragmatically, taking into account a company’s unique circumstances where relevant. BlackRock inform their 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.

How does this manager determine what constitutes a 'Significant' Vote?

BlackRock Investment Stewardship prioritizes its work around themes that BlackRock believe will encourage sound governance practices and deliver sustainable long-term financial performance. BlackRock has year-round engagement with clients to understand their priorities and expectations, as well as BlackRock’s active participation in market-wide policy debates, which help inform these themes. The themes BlackRock have identified in turn shape BlackRock’s Global Principles, market-specific Voting Guidelines and Engagement Priorities, which form the benchmark against which BlackRock look at the sustainable long-term financial performance of investee companies.

BlackRock periodically publish "vote bulletins" setting out detailed explanations of key votes relating to governance, strategic and sustainability issues that BlackRock consider, based on their Global Principles and Engagement Priorities, material to a company's sustainable long-term financial performance. These bulletins are intended to explain BlackRock's vote decision, including the analysis underpinning it and relevant engagement history when applicable, where the issues involved are likely to be high-profile and therefore of interest to BlackRock's clients and other stakeholders, and potentially represent a material risk to the investment BlackRock undertake on behalf of clients. BlackRock make this information public shortly after the shareholder meeting, so clients and others can be aware of BlackRock's vote determination when it is most relevant to them. BlackRock consider these vote bulletins to contain explanations of the most significant votes for the purposes of evolving regulatory requirements.

Does the manager utilise a Proxy Voting System? If so, please detail

BlackRock's proxy voting process is led by the BlackRock Investment Stewardship team (BIS), which consists of three regional teams – Americas ("AMRS"), Asia-Pacific ("APAC"), and Europe, Middle East and Africa ("EMEA") - located in seven offices around the world. The analysts within each team will generally determine how to vote at the meetings of the companies they cover. Voting decisions are made by members of the BlackRock Investment Stewardship team with input from investment colleagues as required, in each case, in accordance with BlackRock's Global Principles and custom market-specific voting guidelines.

While BlackRock subscribe to research from the proxy advisory firms Institutional Shareholder Services (ISS) and Glass Lewis, it is just one among many inputs into BlackRock's vote analysis process, and BlackRock do not blindly follow their recommendations on how to vote. BlackRock primarily use proxy research firms to synthesise corporate governance information and analysis into a concise, easily reviewable format so that BlackRock's investment stewardship analysts can readily identify and prioritise those companies where BlackRock's own additional research and engagement would be beneficial. Other sources of information BlackRock use include the company's own reporting (such as the proxy statement and the website), BlackRock's engagement and voting history with the company, and the views of BlackRock's active investors, public information and ESG research.

In summary, proxy research firms help BlackRock deploy their resources to greatest effect in meeting client expectations.
• BlackRock sees its investment stewardship program, including proxy voting, as part of its fiduciary duty to and enhance the value of clients' assets, using BlackRock's voice as a shareholder on their behalf to ensure that companies are well led and well managed.

• BlackRock use proxy research firms in their voting process, primarily to synthesise information and analysis into a concise, easily reviewable format so that analysts can readily identify and prioritise those companies where BlackRock's own additional research and engagement would be beneficial.

• BlackRock do not follow any single proxy research firm's voting recommendations and in most markets, BlackRock subscribe to two research providers and use several other inputs, including a company's own disclosures, in their voting and engagement analysis.

• BlackRock also work with proxy research firms, which apply BlackRock's 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 their voting decision.

• The proxy voting operating environment is complex and BlackRock work with proxy research firms to execute vote instructions, manage client accounts in relation to voting and facilitate client reporting on voting.

Top 5 Significant Votes during the Period				
Company	Date of Vote	Voting Subject	How did the Investment Manager vote	Result
Amplifon SpA	30 April 2024	Amend Company Bylaws	Against	Pass
BIS did not support management's recommendation on amending Amplifon's AOA to further increase voting rights for certain shareholders. In BlackRock's view, the proposed share structure would significantly impact the fundamental rights of minority shareholders, including BlackRock's clients, to signal support for or concerns about a company's approach to delivering long-term financial returns.				
The Walt Disney Company	3 April 2024	Vote on Board Size and Related Vacancies	Against	Fail
BIS voted in support of management's recommended slate of directors. BlackRock recognise that many of the issues they have discussed with the company over the past few years will take time to address and translate into financial results. In BlackRock's assessment, the Disney board and management have taken steps to restore investor confidence, have been responsive to shareholders and have demonstrated progress in implementing the company's revised strategy. As a result, BlackRock determined that the directors proposed by management are best placed to oversee the implementation of the revised strategy and make any necessary governance changes.				
The Boeing Company	17-May-24	Ratify Named Executive Officers' Compensation	For	Pass
BIS supported the advisory vote on executive compensation given the Compensation Committee made significant changes to reduce payouts and restructure the compensation program following the Alaska Airlines incident and in response to shareholder feedback. As outlined in their approach to engagement on incentives aligned with financial value creation, executive compensation is an important tool used by companies to drive long-term financial value creation by motivating and rewarding the successful delivery of strategic goals and financial outperformance against peers. In their view, it is important for companies to make clear in their disclosures the connection between compensation policies and outcomes and the financial interests of long-term shareholders.				
Temenos AG	07-May-24	Approve Remuneration Report	Against	Fail
BIS did not support Temenos' executive remuneration policy, because, in their view, the proposed remuneration structure and disclosures lacked sufficient detail as to how it aligns with the long-term financial of interests of minority shareholders, including BlackRock's clients. As discussed in BIS' Global Principles, they find it helpful when companies disclose a clear link between variable pay and operational and financial performance in executive remuneration practices, with performance metrics aligned with a company's strategy and business model. Moreover, in their view, Long Term Incentive Programs (LTIPs) should encompass				

timeframes that are distinct from annual executive compensation structures and metrics and encourage the delivery of strong financial results over a period of at least three, and preferably five years. Given the poor structure of the remuneration policy, Temenos' continued unresponsiveness to shareholder feedback, and a reward system that does not align with the financial outcomes for shareholders, including BlackRock clients, BIS did not support the management proposal.				
Tesla Inc.	13 June 2024	Report on Harassment and Discrimination Prevention Efforts	For	Fail
BIS supported the shareholder proposal regarding reporting on harassment and discrimination prevention efforts because, in their view, greater disclosures on this issue, which they deem material to the long-term financial interests of shareholders, would help investors better assess risks at the company.				

Disclaimer: All voting examples are provided at a firm level for the 12-month period to 31 December 2024, as provided by the investment manager. Neither XPS IL nor the Trustee has vetted these votes.

Engagement information

To monitor engagement undertaken by the investment managers, particularly against the Scheme-specific stewardship priorities, the Trustee has collected the following information.

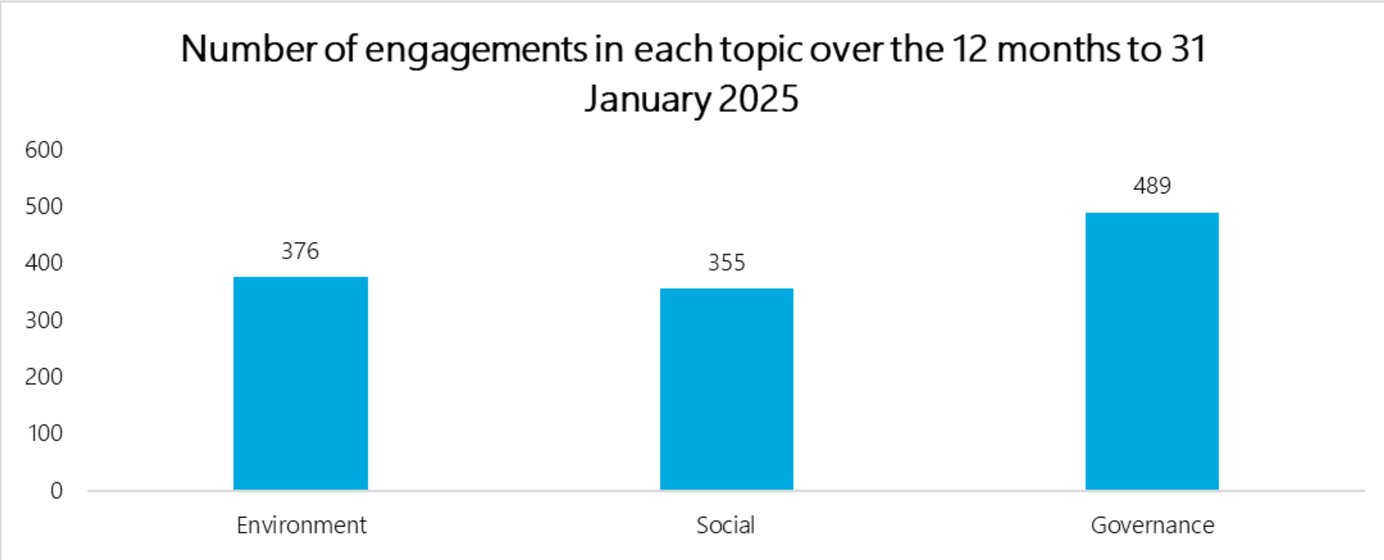
- Climate Change: low-carbon transition and physical damages resilience;
- Pollution, natural resource degradation and energy efficiency: air, water, and land (forests, soils and biodiversity);
- Human rights: modern slavery, pay and safety in workforce and supply chains, and abuses in conflict zones;
- Diversity, Equity and Inclusion: inclusive and diverse decision making.

Engagement data provided by Allianz

Allianz have provided engagement data for the Allianz Global Multi Sector Credit Fund which the Scheme invested in during the accounting period. Information for the 12-month period to 31 January 2025 is provided below.

Firm level engagement Information	
Engagement focus	More than 80% of Allianz's engagements are conducted with corporate issuers, with the remaining amount consisting of engagements with governments, regulators and industry bodies. Allianz are an active member of industry committees, working groups and initiatives around the world. They engaged with national and international regulators, policy makers and politicians in discussions ranging from engagement, stewardship and net zero commitments to regulatory framework consistency, implementation timelines and ESG ratings
How many entities did you engage with over the last 12 months at firm level?	495
How many engagements took place over the last 12 months at firm level?	605

How many substantial engagements took place over the last 12 months at firm level?	480



**Allianz only provide engagement info across Environmental, Social and Governance factors.*
*** Figures may not sum due to engagements covering multiple themes.*

The section below provides an example of where the investment manager has engaged with the underlying company, of which the Fund invests in, over the course of the 12-month period.

Allianz Multi Sector Credit Fund - Engagement Example

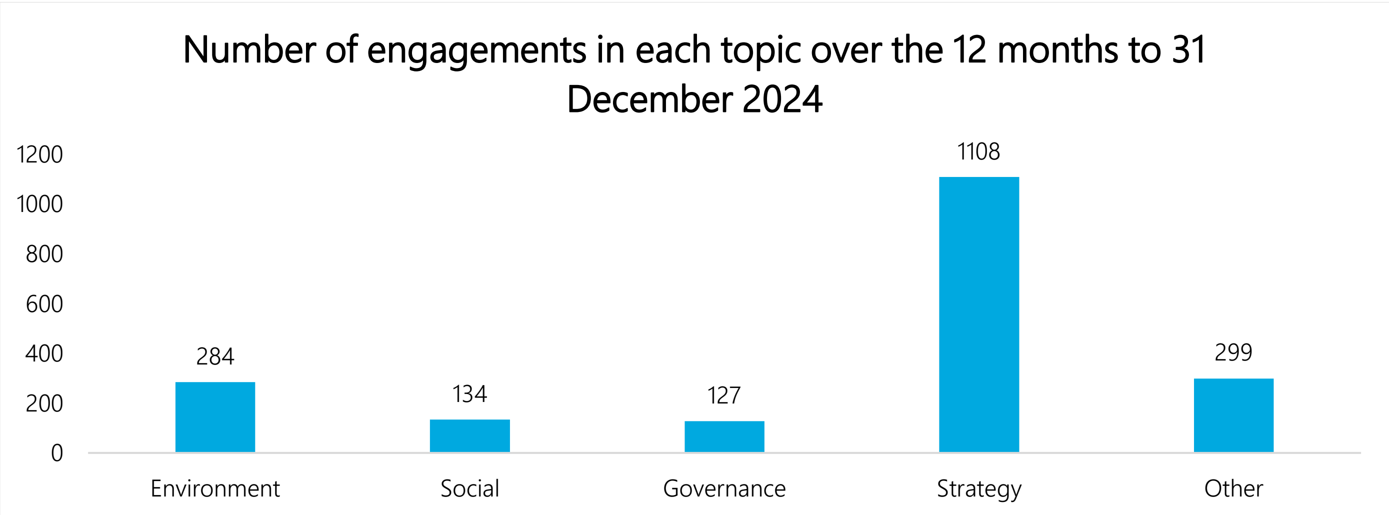
Name of entity you engaged	Veolia
Topic of Engagement	Environment - Climate change
Rationale for engagement	Allianz believe climate transition is a key material topic for utilities companies, they have therefore been engaging with Utilities companies on an ongoing basis to validate and guide their setup and implementation of credible climate transition plan. Allianz are engaging with Veolia, as part of our collaborative engagement with a utilities company under the IIGCC Net Zero Engagement Initiative.
Engagement activity carried out	Allianz started the climate engagement with Veolia since 2022, and have one engagement per year to discuss this topic. Since 2024, they have joined the Net Zero Engagement Initiative to collaboratively engage with the company on this topic. Allianz normally engage with senior leaders who are responsible for sustainability in the company, and IR team and Board Directors also attended the meetings.
Outcomes and next steps	In 2024 Allianz recorded a stewardship outcome evidenced by the publication of the company's climate transition plan and the Science Based Targets initiative (SBTi) validation of their net zero targets. The company published a comprehensive climate transition report largely informed by the investor recommendations conveyed during their engagement in recent years. The report reflects their collective ask of ambitious decarbonisation targets, an explanation of decarbonisation drivers, and a detailed roadmap. Allianz also noted that the SBTi validated their decarbonisation trajectory in line with the 1.5°C target and recognised the net zero plan as the most ambitious among those tracked by Moody's. Furthermore, Allianz appreciate the quality

	of the company's transition plan, which is based on the use of proven technologies and a higher-than-average return on transition investments.

Engagement data provided by Insight

Insight have provided engagement data for the Insight High Grade ABS Fund. Information for the 12-month period to 31 December 2024 is provided below.

Firm level engagement Information	
Engagement focus	Engagement with issuers is a key part of Insight's credit analysis and monitoring and complements their approach to responsible investment. Insight's credit analysts regularly meet with issuers to discuss ESG related and non-ESG related issues. Insight also have a dedicated stewardship programme, which includes their prioritised ESG engagement themes. Insight's prioritised themes for this year are climate change, natural capital and labour management (human rights in the case of sovereign issuers).
How many entities did you engage with over the last 12 months at firm level?	607
How many engagements took place over the last 12 months at firm level?	>900
How many substantial engagements took place over the last 12 months at firm level?	Not provided



** Figures may not sum due to engagements covering multiple themes.*

The section below provides an example of where the investment manager has engaged with the underlying company, of which the Fund invests in, over the course of the 12-month period.

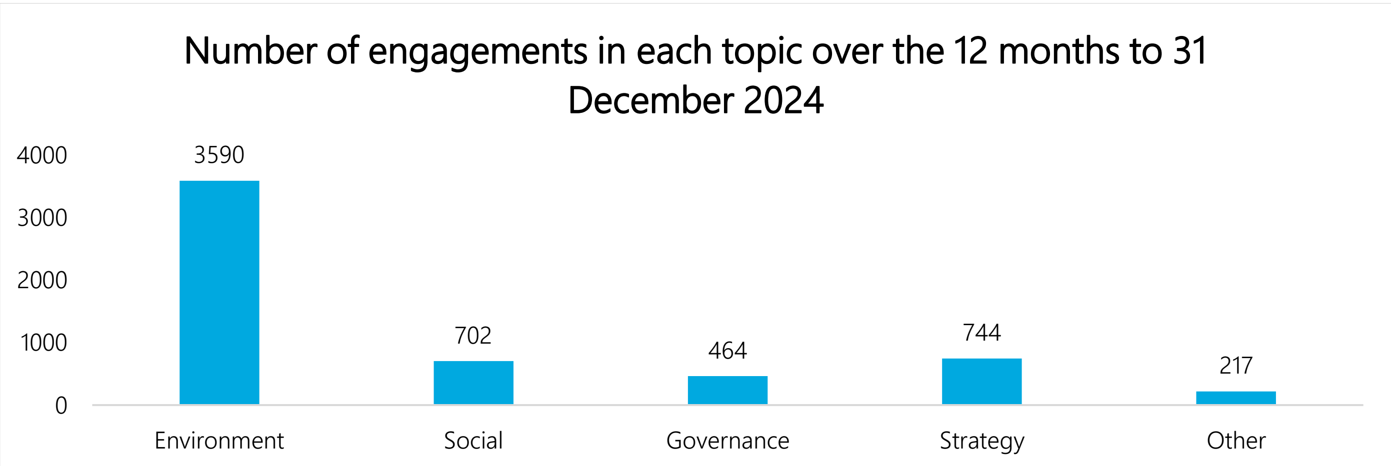
Insight High Grade ABS Credit Fund - Engagement Example

Name of entity you engaged	Polus (Cain - CRNCL)
Topic of Engagement	ESG restrictions within CLO
Rationale for engagement	Polus is a CLO manager. Engagement aims to work with the CLO manager to implement more rigorous ESG framework within the CLO structure.
Engagement activity carried out	Engagement started in Q4 2023, driven by the new issue (CLO) brought by Polus. Insight's CLO ESG framework identified their ESG score as within the bottom 10% of their investment universe, highlighting an engagement opportunity. Insight engaged with the originator to encourage them to amend the terms of the new issue.
Outcomes and next steps	RFTE agreed to amend the deal terms and to introduce appropriate changes to their documentation. The amended deal then scored in the top quartile for ESG framework under Insight's proprietary methodology. The adjustment resulted in the originator amending the language in their CLO documentation to implement formal ESG Conduct Based Exclusions that each obligor has been assessed and continues to be in severe violation of one or more of the UN Global Compact 10 principles or the OECD Guidelines for Multi-national Enterprises. These changes moved RFTE to the average rating for CLO restrictions and therefore brought them into line with peers.

Engagement data provided by LGIM

LGIM have provided engagement data for the LGIM LDI Funds. Information for the 12-month period to 31 December 2024 is provided below.

Firm level engagement Information	
Engagement focus	LGIM believe effective stewardship involves working with companies, regulators, policymakers, peers and other stakeholders around the world to tackle systemic issues, material risks and opportunities – as well as collaborating with LGIM's investment experts to identify future challenges While much of LGIM's engagement is focused on 'laggards', (companies that lag behind in ESG factors) they also engage with companies that are demonstrating progress and positive practices; through their continued improvement and influence, LGIM believe that they are instrumental in raising the bar for their sectors and supply chains, demonstrating what is achievable. LGIM's aim is to help drive positive change across global markets, and improvements from the 'top' performers play as important a role as those at the other end of the spectrum.
How many entities did you engage with over the last 12 months at firm level?	3,447
How many engagements took place over the last 12 months at firm level?	4,399
How many substantial engagements took place over the last 12 months at firm level?	Not provided



** Figures may not sum due to engagements covering multiple themes.*

The section below provides an example of where the investment manager has engaged with the underlying company, of which the Fund invests in, over the course of the 12-month period.

LGIM - Engagement Example

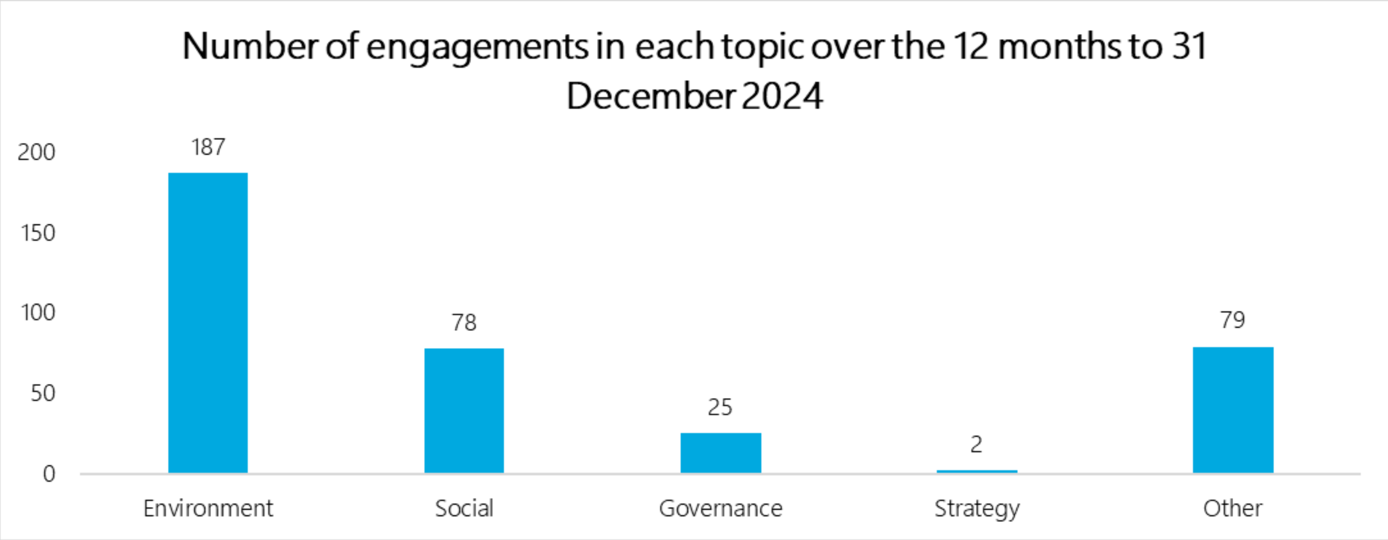
Name of entity you engaged	Toyota Motor Corp
Topic of Engagement	Governance: capital allocation; board independence, diversity and effectiveness (Corporate transparency) Climate Change: Climate lobbying disclosure and alignment of lobbying practices with net zero commitments
Rationale for engagement	As a longstanding member of the Asian Corporate Governance Association network ('ACGA') Japan Working Group, LGIM engages with Japanese companies, including Toyota Motor Corporation, to improve their corporate governance and sustainability practices. LGIM have identified Toyota's key issues to be: i) capital allocation decisions (cross-shareholdings and insufficient investments in zero-emissions vehicles and related infrastructure, and ii) board independence, diversity and effectiveness. iii) A climate transition strategy misaligned to industry expectations and associated political lobbying activity. More recently, the company has been implicated in a few controversies regarding the quality and safety of products at its subsidiaries, and the governance of group companies has also been questioned. Toyota is one of the world's largest and most influential companies. They have long pushed their multi-pathway strategy of decarbonisation, incorporating a mixture of vehicle types - hybrids, EVs, fuel cell. These will have important roles in transitioning to net zero transportation. In certain regions that are making rapid progress towards EVs, Toyota have received negative press on their lobbying practices. LGIM have been clear in their engagement that Toyota should advocate for public policies that support global climate ambitions and not stall progress on a Paris-aligned regulatory environment. With regards to LGIM's Climate Impact Pledge expectations, they would like to see greater clarity from the company regarding how its 'multi-pathway' strategy aligns with its climate goals and with regulatory developments, specifically relating to the absence of a target for phasing out ICE vehicles. UN SDG 13: Climate action
Engagement activity carried out	Since 2023, LGIM have continued their conversations with the company and increased the frequency of their meetings, both individually and collaboratively, on governance and climate topics. Concerns about irregularities regarding certifications, the accountability for this, and transparency at the company have also been a topic of engagement. Given the company's size and influence at Japan's largest business federation and in industry associations, LGIM have continued to question the company's lobbying stance and its alignment with a 1.5°C transition pathway. In addition to a number of email exchanges, LGIM met with the company three times in 2024. Levels of individual typically engaged with include the Head of Investor Relations and the Finance Director.

	LGIM also supported a shareholder proposal requesting greater transparency regarding climate lobbying activities.
Outcomes and next steps	LGIM will continue to engage with the company on corporate governance issues and push for better practices both in terms of governance and climate strategy, as mismanagement of these incidents may lead to erosion of customer trust and exposes the company to reputational and legal risks. LGIM are pleased with the progress Toyota is making on lobbying disclosures and are encouraged that Toyota have proactively responded to investor feedback and expectations in various iterations of the lobbying report. However, LGIM would still welcome further clarity on Toyota's position on specific climate policies in key markets and how they align with the decarbonisation and electrification strategy. A more complete overview of the governance concerning climate lobbying positions and assessments, including an alignment review by the Board of Directors, would also be desirable. LGIM also expect greater clarity on what action is taken where inconsistencies are identified within trade associations and their alignment to Toyotas climate ambitions. LGIM will continue to engage with the company on both climate and governance issues, alongside the ACGA. LGIM consider the objectives outlined above to be "in progress".

Engagement data provided by Payden & Rygel

Payden & Rygel have provided engagement data for the Payden & Rygel Absolute Return Bond Fund. Information for the 12-month period to 31 December 2024 is provided below.

Firm level engagement Information	
Engagement focus	Payden & Rygel and its affiliates ("Payden") believe environmental, social and governance ("ESG") factors have the potential to impact the long-term financial performance of an issuer and the performance of its securities. They deem engagement to be a tool for understanding how issuers intend to deal with ESG issues over time or focus on specific themes. In addition, they view engagement as an opportunity to learn about an issuer's response to the evolving ESG landscape.
How many entities did you engage with over the last 12 months at firm level?	57
How many engagements took place over the last 12 months at firm level?	107
How many substantial engagements took place over the last 12 months at firm level?	Not provided



** Figures may not sum due to engagements covering multiple themes.*

The section below provides an example of where the investment manager has engaged with the underlying company, of which the Fund invests in, over the course of the 12-month period.

Payden & Rygel Absolute Return Bond Fund - Engagement Example

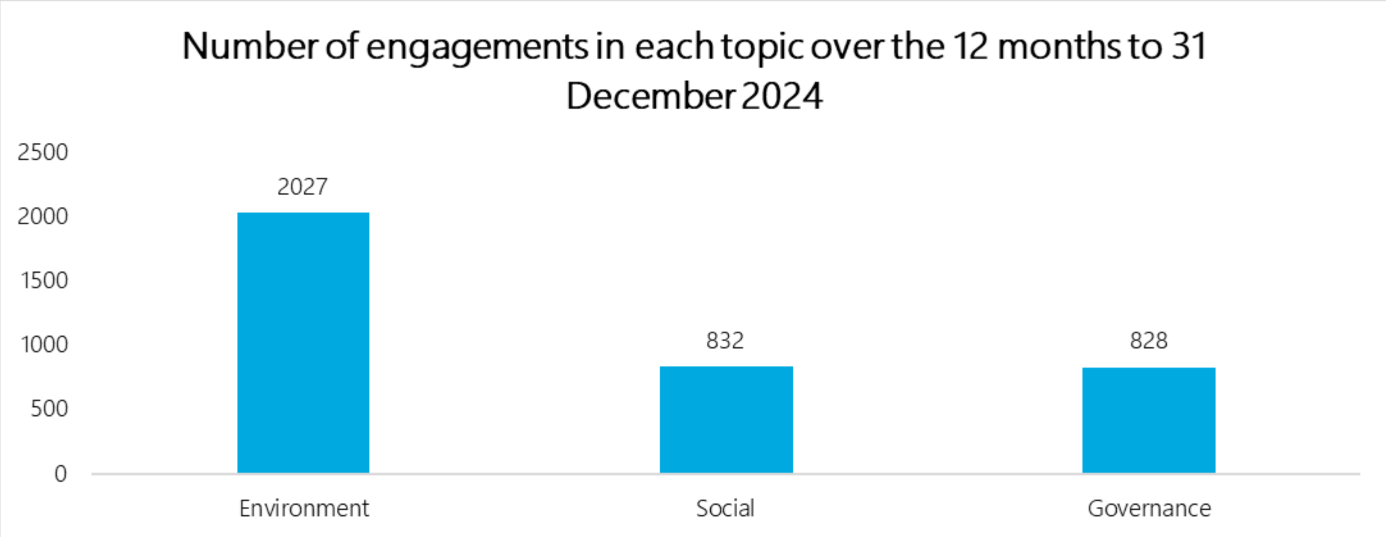
Name of entity you engaged	Barclays PLC
Topic of Engagement	Environment - Climate change
Rationale for engagement	Barclays is headquartered in the UK and offers a diverse range of global financial services including retail banking, wholesale banking, investment banking, and wealth management services. Payden had previously engaged with the company on ESG topics and long term GHG reduction targets. Following their review of the company's latest public disclosures they sought to engage to better understand its near term 2025 interim targets and its progression toward these goals.
Engagement activity carried out	The engagement was led by members of Payden's ESG team with attendance from members of the Barclays Investor Relations team. This latest engagement forms part of an ongoing dialogue with Barclays to understand its GHG reduction strategy. Barclays previously shared (2023) its long-term targets, including a 2030 financed emissions goal, and Payden were keen to understand progress and developments regarding these targets. As part of Barclay's commitment to the Net Zero Banking Alliance (NZBA), it has set targets for the highest financed emitting sectors (defined by the UNEP Finance Initiative) including energy and power.
Outcomes and next steps	Barclays shared promising progress on its performance against its fast-approaching interim targets. For energy, Barclays reported that it achieved its 2025 target to reduce financed emissions by 15%, and for power, it had decreased financed emissions by 26% and is on track to meet the 30% 2025 target. The company was pleased to highlight that it has extended targets to other sectors, including 2030 targets for aviation, agriculture, and UK commercial real estate sectors. In addition, Barclays shared that it has increased its allocation of resources to support clients in reaching their ESG goals. For example, at the time of the engagement, the company had facilitated over $120 billion in financing for its clients through a range of environmental, social, sustainability-link, and transition opportunities. Barclays has also made direct investments into

	sustainable capital with more than $160 billion invested and is expecting to increase investments to over $500 billion by 2027. Payden will continue to monitor the company's progress and may engage in the future.

Engagement data provided by BlackRock

BlackRock have provided engagement data for the 12-month period to 31 December 2024 which is provided below.

Firm level engagement Information	
Engagement focus	BlackRock's stewardship policies are developed and implemented separately by two independent, specialist teams, BlackRock Investment Stewardship (BIS) and BlackRock Active Investment Stewardship (BAIS). The teams focus on the firm's four key pillars of stewardship. Engaging with companies: BlackRock stewardship analysts engage with the boards and management of companies in which clients are invested to listen to their perspectives on material business risks and opportunities they are facing to help make more informed voting decisions. Proxy voting on behalf of clients: Voting at a company's shareholder meeting is a basic right of share ownership and the formal means by which investors express their views on a company's corporate governance and performance. Contributing to industry dialogue on stewardship: BlackRock's stewardship teams contribute to market-level discussions to share perspectives on topical and emerging stewardship issues. Reporting on stewardship activities: BlackRock informs clients about their stewardship activities on their behalf through a range of publications on their website, as well as through direct reporting.
How many entities did you engage with over the last 12 months at firm level?	1,370
How many engagements took place over the last 12 months at firm level?	2,138
How many substantial engagements took place over the last 12 months at firm level?	Not provided



**BlackRock only provide engagement info across Environmental, Social and Governance factors.*

*** Figures may not sum due to engagements covering multiple themes.*

The section below provides an example of where the investment manager has engaged with the underlying company, of which the Fund invests in, over the course of the 12-month period.

BlackRock Firm Level - Engagement Example

Name of entity you engaged	Barclays Plc
Topic of Engagement	Environmental - Climate Strategy Governance - Board Composition
Rationale for engagement	BlackRock Investment Stewardship (BIS) has engaged with Barclays to give the company an opportunity to provide additional clarity on business relevant matters that, in BIS' view, support Barclays' ability to deliver long-term financial returns over time.
Engagement activity carried out.	In March 2024, BIS met with Barclays' Group Head of Sustainability and a representative of the executive management team in order to provide them with an opportunity to clarify the company's climate strategy. These discussions focused on the company enhancing BIS' understanding of Barclays' sustainability governance framework, the ways that Barclays has elected to support the transition with their clients, and the levers Barclays has chosen to employ to manage financed emissions. In July 2024, BIS met with Barclays' board chair and a representative of its executive management team in order to provide them with an opportunity to clarify the composition of its board and executive management teams, the execution of its stated corporate strategy in light of macroeconomic and geopolitical developments at the time, and its approach to climate-related risks and opportunities. Specifically, BIS received an update on how Barclays is considering board refreshment with a focus on relevant financial industry experience, the company's assessment of its financial performance, and its efforts to enhance its climate-related disclosures.

Outcomes and next steps	At the May 2024 annual general meeting (AGM), BIS supported management's recommendation on all items. All proposals received over 90% support at the May 2024 AGM.

I confirm that this Implementation Statement is accurate, and representative of the Trustee's investment policies followed during the year.

Signed: Alison Creasy, For and on behalf of BESTrustees Limited, Trustee

Date: 11 June 2025