Sandberg Pension Plan
Implementation Statement for the year ended 31 December 2024

Purpose

This Implementation Statement provides information on how, and the extent to which, the Trustees of the Sandberg Pension Plan (the "Plan") have followed the policies documented in their Statement of Investment Principles ("SIP") during the year ended 31 December 2024 ("the reporting year"). In addition, the statement provides a summary of the voting behaviour and most significant votes cast during the reporting year.

Latest review of the Statement of Investment Principles

The SIP was updated in September 2024, and incorporates the Trustees' latest views on environmental, social and governance ('ESG') factors. A copy of the latest SIP is available on request.

Manager selection exercises

One of the main ways in which ESG factors and climate change related risks are taken into consideration is through manager selection exercises: the Trustees seek advice from XPS on the extent to which their views on ESG and climate change risks may be taken into account in any future investment manager selection exercises. There were no such exercises over the reporting period.

The Trustees' investment policies

Over the reporting period, the Trustees had various investment policies for the Plan on the topics listed in the table below; the table also provides commentary on how and the extent to which the various policies were followed during the reporting year.

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Policy	How the policy was followed	The extent to which the policy was followed
Asset allocation/restrictions The Trustees' policy is to hold a combination of public equities, private equities, and matching assets.	The SIP was updated in September 2024 to reflect the strategic investment changes made over the reporting period.	Now that the SIP has been updated and reflects the most recent strategic changes, the Trustees are satisfied that they followed the policy in full over the reporting period.
Balance between investments The Trustees intend to meet the investment objective by investing in a diversified portfolio of return-seeking and liability-matching assets.	The Plan invests in a combination of public equities, private equities, and matching assets.	The Trustees are satisfied that they followed the policy in full over the reporting period.
Risks (measurement and management) The Trustees have a number of policies in respect of risk management and measurement. The Trustees recognise a number of risks involved in the investment of assets of the Plan.	The Trustees invest in matching assets with the aim of mitigating unrewarded risks and hold return-seeking assets with the view that the risks exposed are rewarded through investment returns. Risks recognised by the Trustees are detailed in the SIP.	The Trustees are satisfied that they followed the policy in full over the reporting period.
Expected return The Trustees have selected a combination of return seeking assets and liability matching assets to achieve an appropriate level of return for the Plan.	The Plan's current strategy has a greater allocation to return seeking assets to increase the expected return in line with the updated SIP.	The Trustees are satisfied that they followed the policy in full over the reporting period.
Realisation of investments The Trustees' policy is to ensure that an appropriate amount of readily realisable assets are held at all times, and this will be part of the assessment for including new investments within the strategy.	The Plan holds liquid assets to fund cashflow needs as required.	The Trustees are satisfied that they followed the policy in full over the reporting period.
ESG The Trustees' policy is to delegate the ongoing monitoring and management of ESG risks and those related to climate change to the Plan's investment managers.	The investment managers have responsibility for the ongoing monitoring and management of ESG risks and those related to climate change. This is detailed in the SIP.	The Trustees are satisfied that they followed the policy in full over the reporting period.

Non-financial matters The Trustees' policy is that non-financial matters should not be taken into account in the selection, retention and realisation of investments.	The policy on non-financial matters is detailed in the SIP.	The Trustees are satisfied that they followed the policy in full over the reporting period.
Voting rights The Trustees have delegated responsibility for the exercise of rights (including voting rights) attached to the Plan's investments to the investment managers.	The investment managers are expected to vote in accordance with their internal voting policies.	The Trustees are satisfied that they followed the policy in full over the reporting period.
Stewardship/relationship with managers The Trustees' policy is to encourage investment managers to engage with investee companies and vote whenever it is practical to do so on financially material matters including those deemed to include a material ESG and/or climate change risk in relation to those investments.	The Trustees have yet to engage in any meaningful way with the investment managers, however voting and engagement information is detailed within this Statement.	The Trustees are satisfied that they followed the policy in full over the reporting period.

Voting

The Trustees have delegated responsibility for the exercise of rights (including voting rights) attached to the Plan's investments to the investment managers and encourage them to engage with investee companies and vote whenever it is practical to do so on financially material matters including those deemed to include a material ESG and / or climate change risk in relation to those investments.

The main asset class where the investment managers will have voting rights is equities. The Plan has specific allocations to public and private equities, in UK and overseas markets. A summary of the voting behaviour and most significant votes cast by each of the investment manager organisations for the relevant funds is shown below.

Over the reporting period, the Plan had exposure to equities through the Partners Group Partners Fund, the Artemis UK Select Fund, the Standard Life Vanguard FTSE Developed World (ex-UK) Index Fund, and the Standard Life Vanguard FTSE Developed World Equity Hedged Index Fund.

<u>Notes:</u>

1. Vanguard: Vanguard do not provide a breakdown of voting rationale information. However, their voting engagement activities align with their four corporate governance pillars: board composition and effectiveness, board oversight of strategy and risk, executive pay (compensation and renumeration), shareholder rights.

   Vanguard highlights these proposals because they (i) involved a vote at a company in which Vanguard holds a meaningful ownership position, (ii) conveyed their perspective on an important governance topic elevated during the proxy season, or (iii) communicated their view of progress—or lack thereof—by a company and its board.

2. Artemis UK Select Fund: The Plan disinvested from the Artemis UK Select Fund over the reporting period. Artemis provided information for the six month period until 30 June 2024 - corresponding approximately with Plan's disinvestment date from the fund, with details of one significant vote over the period.
3. Partners Group: Private markets investments are the largest exposure within the Partners Group Partners Fund and these are typically held directly, where Partners Group controls the board and therefore the direction and strategy of the business. The Partners Fund's exposure in listed equity is usually <10%. As private companies, these initiatives are implemented by Partners Group rather than by a shareholder vote, as with listed equities.

   Partners Group have therefore provided significant voting information on the private market investments where they have control of the board. Voting data is based on engagement topics implemented, rather than votes on a specific date.

Voting Information
Vanguard
Investment Manager Client Consultation Policy on Voting
Vanguard do not consult with individual clients / investors before voting. Vanguard understands that people have a wide variety of deeply felt humanitarian, ethical, environmental, and social concerns, and that some may want to see their beliefs reflected in their investments. As a fiduciary and the steward of lifetime savings for more than 30 million investors worldwide, Vanguard is required to manage their funds in the best interests of shareholders and obligated to maximize returns in order to help shareholders meet their financial goals. Vanguard's Investment Stewardship website (link to the website can be found below) is the primary source of information about their investment stewardship program, and can provide portfolio companies with comprehensive information about their principles-based approach, perspectives and commentary, proxy voting guidelines, responsible investment policy, insights on environmental, social, and governance (ESG) topics, and proxy votes cast by their funds in the last proxy season. https://global.vanguard.com/portal/site/portal/investment-stewardship-overview
Investment Manager Process to determine how to Vote
Vanguard Investment Stewardship team makes every effort to cast proxy votes at all meetings at which their funds are eligible to vote. Each fund advised by Vanguard has adopted a voting policy, which details the general positions of the funds on recurring proxy proposals at public companies. In some cases, country-specific guidelines for key markets are applied. An experienced team of analysts evaluates each proposal on a case-by-case basis and casts the funds' votes in accordance with Vanguard's voting guidelines, and based on their analysis of the impact of the proposal on long-term value. The guidelines for these case-by-case items set forth the general frameworks for Vanguard's analysis. Proposals for which specific guidelines are not defined will likewise be voted on a case-by-case basis in the best interests of each fund consistent with the principles articulated in their proxy voting guidelines and each fund's investment objective. Proxy voting responsibilities for Vanguard's externally-managed active funds are performed by those funds' external advisors. The external managers have proxy voting guidelines designed to ensure they vote consistent with their fiduciary obligations. Each manager has its own policies and guidelines that govern their voting decisions. A number of qualitative

and quantitative considerations inform these decisions, including context around the company, the industry, and the region in which business is being conducted. The external managers are carefully selected to ensure their investment principles and processes align with the best interest of the Vanguard funds they manage. The externally managed funds hold their portfolio managers to high standards of portfolio management and compliance, and are confident in the managers' ability to act in the best interest of the funds.
How does this manager determine what constitutes a 'Significant' Vote?
Vanguard has identified a range of criteria that they contribute to a vote being deemed as a 'Significant vote'. Vanguard's criteria are applied to companies that are held in their internally managed equity portfolios. Vanguard publishes SRD II-compliant engagement and significant votes reports on its website on a quarterly basis. Vanguard report their significant vote data at an entity level in accordance with SRD II requirements. It is important to note that under their framework they would expect to see variations in the number of significant votes identified per period.
Does the manager utilise a Proxy Voting System? If so, please detail
Vanguard Investment Stewardship team votes on behalf of Vanguard's internally managed equity holdings. Vanguard casts proxy votes via dedicated voting providers. Vanguard consult a wide variety of third-party research providers and their own internal proprietary databases. Vanguard then analyse the various issues and ballot measures in conjunction with their Proxy Voting Guidelines and other relevant data to reach their own independent decisions. The Investment Stewardship team uses a variety of research from well-known providers, such as ISS, Glass Lewis, and Equilar, as well as a number of smaller research providers. Vanguard do not rely on recommendations from proxy advisors for their voting decisions. Vanguard believe it is valuable to understand all sides of an issue before casting a vote on behalf of a Vanguard fund. As such, proxy advisors can be a useful data aggregator which serves as one of the many inputs that Vanguard's Investment Stewardship team uses to reach independent voting decisions on each funds' behalf.

Vanguard FTSE Developed World (ex-UK) Equity Index Fund					
The manager voted on 99% of resolutions of which they were eligible out of 8,573 eligible votes.					
Top 5 Significant Votes during the Period					
Company	Date of Vote	Size of fund holdings	Voting subject	How did the Investment Manager Vote?	Outcome
LVMH Moet Hennessy Louis Vuitton SE	18/4/2024	Information not provided	10 Approve Compensation Report of Corporate Officers	Against	Pass

Why the vote was deemed significant: N/A **Where voted against the company, was this communicated:** N/A **Rationale:** Concern regarding compensation/remuneration. **Implication:** N/A.

Company	Date of Vote	Size of fund holdings	Voting subject	How did the Investment Manager Vote?	Outcome
Vonovia SE	8/5/2024	Information not provided	Approve Remuneration Report	Against	Pass

Why the vote was deemed significant: N/A **Where voted against the company, was this communicated:** N/A **Rationale:** Concern regarding compensation/remuneration. **Implication:** N/A.

Company	Date of Vote	Size of fund holdings	Voting subject	How did the Investment Manager Vote?	Outcome
LVMH Moet Hennessy Louis Vuitton SE	18/4/2024	Information not provided	Approve Compensation of Bernard Arnault, Chairman and CEO	Against	Pass

Why the vote was deemed significant: N/A **Where voted against the company, was this communicated:** N/A **Rationale:** Concern regarding compensation/remuneration. **Implication:** N/A.

Vanguard FTSE Developed World Hedged Fund
The manager voted on 98% of resolutions of which they were eligible out of 28,513 eligible votes.

Top 5 Significant Votes during the Period					
Company	Date of Vote	Size of fund holdings	Voting subject	How did the Investment Manager Vote?	Outcome
Pioneer Natural Resources Company	7/2/2024	Information not provided	2 Advisory Vote on Golden Parachutes	Against	Fail
Why the vote was deemed significant: N/A **Where voted against the company, was this communicated:** N/A **Rationale:** Concern regarding compensation/remuneration plan structure. Implication: N/A.					
Company	Date of Vote	Size of fund holdings	Voting subject	How did the Investment Manager Vote?	Outcome
The Walt Disney Company	3/4/2024	Information not provided	Elect Management Nominee Director Mary T. Barra	For	Pass
Why the vote was deemed significant: N/A **Where voted against the company, was this communicated:** N/A **Rationale:** Support warranted based on the candidate's experience, independence, and/or qualifications. **Implication:** N/A.					
Company	Date of Vote	Size of fund holdings	Voting subject	How did the Investment Manager Vote?	Outcome
LVMH Moet Hennessy Louis Vuitton SE	18/4/2024	Information not provided	Approve Compensation Report of Corporate Officers	Against	Pass

Why the vote was deemed significant: N/A **Where voted against the company, was this communicated:** N/A **Rationale:** Concern regarding compensation/remuneration. **Implication:** N/A.

Company	Date of Vote	Size of fund holdings	Voting subject	How did the Investment Manager Vote?	Outcome
Norfolk Southern Corporation	9/5/2024	Information not provided	Elect Management Nominee Director Richard H. Anderson	For	Pass

Why the vote was deemed significant: N/A **Where voted against the company, was this communicated:** N/A **Rationale:** Support warranted based on the candidate's experience, independence, and/or qualifications. **Implication:** N/A.

Company	Date of Vote	Size of fund holdings	Voting subject	How did the Investment Manager Vote?	Outcome
Toyota Motor Corp.	18/6/2024	Information not provided	Elect Director Toyoda, Akio	Against	Pass

Why the vote was deemed significant: N/A **Where voted against the company, was this communicated:** N/A **Rationale:** Concern regarding director independence. **Implication:** N/A.

Voting Information
Artemis UK Select Fund
The manager voted on 100% of resolutions of which they were eligible out of 1,033 eligible votes.
Investment Manager Client Consultation Policy on Voting
Whilst Artemis do not proactively consult with clients before voting, any views expressed by a pension fund client can be passed on to the relevant fund managers.
Investment Manager Process to determine how to Vote
Voting decisions are made by Artemis' fund managers, informed by their knowledge of the company concerned, any engagement activity, Artemis' voting policy and input from external research providers, notably Institutional Shareholder Services (ISS). Artemis' voting policy which sets out the principles which direct their votes and can be found via their website https://www.artemisfunds.com/en/about-artemis/stewardship-and-esg#voting
How does this manager determine what constitutes a 'Significant' Vote?
Significant votes are defined as votes against management and where Artemis was voting in excess of 1% of the issued share capital.
Does the manager utilise a Proxy Voting System? If so, please detail
Their voting is informed and carried out by an independent specialist, ISS. Together, they have developed guidelines which take into account local, national and international standards. This ensures their expectations for corporate governance are appropriate to each business they invest in. ISS draws on best practice from around the world for its analysis. Artemis' fund managers have access to this in the form of governance reports. ISS also provides them with a summary of all resolutions put forward at company meetings and assesses the extent to which governance arrangements are in line with best practice. This research is very valuable. But they would emphasise that their fund managers make the final decision on how to vote. The firm carries out due diligence when outsourcing the processing of votes to third parties such as ISS. Any external service must meet the required standard and demonstrate effective operating controls. Artemis review the services provided by ISS annually.

Vote During the Period

Company	Date of Vote	Size of fund holdings	Voting subject	How did the Investment Manager Vote?	Outcome
Mitchells & Butlers Plc	23/1/2024	2.67%	Re-elect Bob Ivell as Director	Against	Pass

Why the vote was deemed significant: The votable share was greater or equal to 1%. **Where voted against the company, was this communicated:** This is occasionally done on a case-by-case basis. **Rationale:** A vote against is warranted as there is a lack of diversity on the board. **Implication:** No further comments were provided by the manager.

Voting Information
Partners Group Partners Fund
The manager voted on 100% of resolutions of which they were eligible out of 781 eligible votes.
Investment Manager Client Consultation Policy on Voting
Partners do not consult with clients before voting. Their voting is based on Partners' internal Proxy Voting Directive utilising the services of Glass Lewis & Co.
Investment Manager Process to determine how to Vote
Voting is based on the Partners Group internal Proxy Voting Directive.
How does this manager determine what constitutes a 'Significant' Vote?
Size of holding in the fund.
Does the manager utilise a Proxy Voting System? If so, please detail
Partners hire services of Glass Lewis & Co, which is one of the leading global proxy voting service providers, and they have been instructed to vote in-line with Partners' Proxy Voting Directive. Wherever the recommendations for Glass Lewis, Partners proxy voting directive, and the company's management differ, Partners vote manually on those proposals.

Company	Voting subject	How did the Investment Manager Vote?	Result
Velvet Care	Establishing a robust governance framework to support Velvet Care's long-term sustainable growth.	Strengthening board governance, formalizing sustainability oversight, and enhancing workforce engagement strategies. Partners have also	Partners will continue supporting the company in scaling its workforce development initiatives and deepening sustainability

		prioritized aligning Velvet Care's policies with global best practices.	integration across its operations.
Gren	Working closely with the company to formalize governance structures, strengthen board oversight, and align sustainability initiatives with long-term strategic goals.	Enabling Gren to progress on major energy transition projects, such as the Energy on Clyde district heating initiative in Glasgow. Additionally, Partners have helped reinforce supplier accountability, workforce engagement programs, and safety initiatives to ensure operational excellence.	Partners will continue to support Gren's decarbonization strategy, focusing on emission reduction targets and expanding its role in delivering sustainable and affordable energy solutions
Confluent Health	Expanding access to high-quality healthcare, enhancing workforce development programs, and improving patient outcomes through digitalization.	Expanding its network of clinics, ensuring more communities benefit from specialized rehabilitation services. Additionally, the company has strengthened its partnerships with universities to train the next generation of physical therapists.	Partners will continue to support technological advancements in patient care, further expand clinic accessibility, and integrate sustainability best practices within healthcare facilities
Exus	Expanding its operational footprint, optimizing energy asset performance, and enhancing ESG compliance across renewable projects.	The company has improved its predictive maintenance technology, optimizing turbine and panel efficiency while reducing downtime.	Partners will continue to support Exus in scaling its renewable energy capacity, enhancing asset digitalization, and exploring new energy storage solutions
International Schools Partnership	Embedding sustainability into the curriculum, expanding student learning opportunities, and improving operational efficiency across school facilities.	Expanding its teacher development programs, ensuring the highest educational standards while promoting diversity, equity, and inclusion within its workforce.	Partners will continue supporting ISP in sustainability-focused facility improvements, decarbonization strategies for school operations, and enhancing digital learning platforms

Engagement

Engagement data provided by Partners over the 12-month period to 31 December 2024

The following engagement examples relate to firm-level theme engagement case studies over the reporting period.

Engagement theme/topic	Environment - Climate change
Rationale for the engagement theme/topic	For every engagement, Partners Group discuss their commitment to ESG and ambition for the company with company management teams, align with company management and PG Investment and Industry Value Creation teams on the ESG topics most relevant to the company or asset's business and stakeholders, identify key ESG improvement opportunities, and define the vision and strategy for the company or asset's ESG engagement with PG.
What Partners Group have done	2024 highlighted Partners continued high-growth conviction on decarbonisation as an investment theme. Having committed to achieve corporate net zero by 2030 across their Scope 1, Scope 2, and material Scope 3 emissions (Categories 1-14) , 2024 marked a year when were assessed how their full investment portfolio (Scope 3 Category 15) will contribute to net zero by 2050. The aim was to see how their existing climate targets could be extended and adhere to the Swiss Climate Ordinance, as well as finding the best approach to apply to their full investment portfolio, covering all asset classes, and supporting 100% of their investments going forward.
Outcomes and next steps	After extensive analysis of various decarbonization frameworks, Partners found that the NZIF best suits Partners Group. They invest directly on a control basis in companies and assets while also having a significant non-control investment portfolio including private credit investments and partnership investments. The NZIF provides Partners Group with a framework for both these types of investments so they ultimately have a single framework covering Partners Group's full AuM. For the direct control assets, the NZIF sets out a framework for companies to develop Paris-aligned greenhouse-gas (GHG) reduction targets, based on credible guidance (e.g. Science Based Targets initiative (SBTi)). For partnership investments, the NZIF sets out an engagement model for Partners Group to engage with the owners/GPs who execute on net zero strategies by 2050.

Engagement theme/topic	Social - Human capital management
Rationale for the engagement theme/topic	For every engagement, Partners Group discuss their commitment to ESG and ambition for the company with company management teams, align with company management and PG Investment and Industry Value Creation teams on the ESG topics most relevant to the company or asset's business and stakeholders, identify key ESG improvement opportunities, and define the vision and strategy for the company or asset's ESG engagement with PG.
What Partners Group have done	Partners aim for a top-quartile employee engagement score, with 75%+ of employees engaged and less than 12% annual attrition. They assure equal pay for equal work globally and equal (promotion) opportunities. They aim for their teams to reflect the local talent pools in the societies in which they operate. They aim for at least 25 female leaders in Senior Management. They will relaunch their PG Stakeholder Impact effort.
Outcomes and next steps	Partners will conduct their annual employee engagement survey, continue to develop employees through PG Academy. Incorporate actions identified through the employee engagement survey into cell leaders' P&D goals, assessment and compensation. They will engage a reputable external party to verify equal pay for equal work (i.e. no material deviations

	globally) and update the D&I Strategy. They define and explore local talent pools and pursue targeted recruitment campaigns (e.g. summer internships; university ambassadors) to increase diversity partners will also relaunch the PG Stakeholder Impact effort and further encourage employees to support local communities through impact / ESG projects that create lasting positive impact, providing their time, expertise or financial resources.

Engagement theme/topic	Strategy, Financial and Reporting
Rationale for the engagement theme/topic	For every engagement, Partners Group discuss their commitment to ESG and ambition for the company with company management teams, align with company management and PG Investment and Industry Value Creation teams on the ESG topics most relevant to the company or asset's business and stakeholders, identify key ESG improvement opportunities, and define the vision and strategy for the company or asset's ESG engagement with PG.
What Partners Group have done	Partners further refine their ESG strategy, governance and control framework, and continue to create value and mitigate risks, which should provide the basis for the highest rating by the UN PRI in its annual assessment. They link a part of their executive compensation to select ESG focus areas and goals. They also aim to hire 50% of new board members from underrepresented groups, without compromising on merit-based assessments. Partners role models, their Board and Executive Team, own and govern the most strategic initiatives at corporate level.
Outcomes and next steps	Partners will Formalize their Internal Control System for ESG processes at corporate level and portfolio level, in line with their ESG & Sustainability Directive. They will continue to prepare for changing ESG regulation and reporting standards (e.g. CSRD, SFDR, TCFD) to adhere to regulation and transparently communicate to their stakeholders. Partners will include ESG and sustainability in the P&D goals, assessment and compensation of leaders and employees, beyond investment departments. They will train all employees on ESG and their Sustainability Strategy through PG Academy to enable them to create impact in their roles. As well as issue a Renumeration Directive that links Board and Executive Team compensation to their Six Pillar Strategy and ESG targets.

This statement has been agreed by the Trustees in July 2025.