

IMPLEMENTATION STATEMENT

Headlam Group plc Staff Retirement Benefits Scheme ('Scheme')

31 March 2025 Implementation Statement

August 2025

1. Introduction

The Trustee is required to make publicly available online a statement ("the Implementation Statement") covering the Headlam Group plc Staff Retirement Benefits Scheme. The SIP was amended over the last 3 years to reflect changes to the Scheme's investment strategy. The Trustee agreed a low risk investment strategy comprising of a full Scheme buy-in contract with Aviva PLC ("Aviva" and "the contract"). The Scheme's remaining assets are managed on a care and maintenance basis.

A copy of the SIP can be found here: <https://www.headlam.com/governance/other-statutory-information/company-pension-scheme-information/>

This Implementation Statement covers the period from 1 April 2024 to 31 March 2025 (the "Scheme Year"). It sets out:

- How the Trustee's policies on stewardship have been followed over the Scheme Year; and
- The voting by or on behalf of the Trustee during the Scheme Year, including the most significant votes cast and any use of a proxy voter during the Scheme Year

The Trustee has no control over the assets held within the full Scheme buy-in contract with Aviva. The Trustee however performed comprehensive due diligence on Aviva prior to the commencement of the contract. Within Aviva's annuity book, assets are held across all buy-in/buyout clients, i.e., Aviva do not identify assets for each client, including the Scheme. We have therefore not been able to provide a client specific summary of voting activity for Aviva.

The latest guidance ("the **Guidance**") from the Department for Work and Pensions ('**DWP**') aims to encourage the Trustee of the Scheme to properly exercise its stewardship policy including both voting and engagement which is documented in the Scheme's SIP. With the help of the Scheme's Fiduciary Manager, to whom the Trustee delegated the implementation of its Stewardship policy, this Implementation Statement has been prepared to provide the details on how the Trustee has complied with the DWP's statutory guidance.

The Trustee uses the Fiduciary Management service of Schroders IS Limited as its Investment Manager and Adviser (referred to as the '**Fiduciary Manager**' in the Implementation Statement). The Fiduciary Manager can appoint other investment managers (referred to as '**Underlying Investment Managers**') to manage part of the Scheme's assets, and investments with these managers are generally made via pooled funds, where the Scheme's investments are pooled with those of other investors.

A copy of the this Implementation Statement is available on the following website:

<https://www.headlam.com/governance/other-statutory-information/company-pension-scheme-information/>

HEADLAM GROUP PLC STAFF RETIREMENT BENEFITS SCHEME

IMPLEMENTATION STATEMENT (continued)

Appendix 1 – ESG, Voting and Engagement Policies

Links to the voting and responsible investment policies for both the Fiduciary Manager and Underlying Investment Managers of the Scheme's actively managed holdings can be found here:

Investment Manager & Underlying Investment Manager	Voting & Engagement Policy
Schroders Solutions	https://mybrand.schroders.com/m/6197143c263420f5/original/Schroders-Group-Sustainable-Investment-Policy.pdf https://mybrand.schroders.com/m/75fa1cd8dd188c3b/original/613798_SC_Listed-Assets-Blueprint-Report- Digital 16 9 V12.pdf
Aviva PLC	Voting rights strategy - Aviva Investors