Engagement Policy Implementation Statement for the Year Ended 30 September 2025

Griffith Pension Scheme ("the Scheme")

1. INTRODUCTION

The Engagement Policy Implementation Statement (known as the Statement) presents the Trustees' assessment of their adherence to their engagement policy and their policy concerning the exercise of rights (including voting rights) attaching to the Scheme's investments throughout the one-year period ending 30 September 2025 (the "Scheme Year"). The Trustees' policies are outlined in their Statement of Investment Principles (SIP). The SIP was last reviewed in June 2025 in order to reflect the refinement in funding objective following the outputs of the triennial actuarial valuation, as well as recent de-risking activity in light of significant funding progression. A copy of the Trustees' SIP is available here.

This Statement has been prepared in accordance with the *Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019* and the guidance published by the Department for Work and Pensions.

The Trustees have appointed Mercer Limited (Mercer) as the discretionary investment manager and the Scheme's assets are invested in a diverse range of specialised pooled funds (known as the Mercer Funds). The management of each of the Mercer Fund's assets is carried out by a Mercer affiliate, namely Mercer Global Investments Europe Limited (MGIE).

The relevant Mercer affiliate is responsible for the appointment and monitoring of a suitably diversified portfolio of specialist third party investment managers for the assets of each Mercer Fund.

Under these arrangements, the Trustees acknowledge that they do not possess direct authority over the engagement or voting policies and arrangements of the Mercer Funds' managers. Mercer's publicly available Sustainability Policy outlines Mercer's investment philosophy and approach to managing sustainability risks and opportunities. The Stewardship Policy provides further details on Mercer's stewardship practices.

Mercer's triennial Client Engagement Survey seeks to incorporate the Trustees' perspectives by assessing the alignment between Mercer's engagement priorities and those of the Trustees. The most recent survey, conducted in 2023, identified key focus areas important to the Trustees. The Trustees also regularly review Mercer's reports on stewardship activities, including engagement and voting, to ensure these align with their own expectations.

Section 2 of this Statement outlines the Trustees' engagement policy and evaluates the extent to which it has been followed during the Scheme Year.

Section 3 sets out the Trustees' policy regarding the exercising of rights (including voting rights) attached to the Scheme's investments. This Section also provides detailed information on the voting activities undertaken by third-party investment managers appointed within the Mercer Funds during the Scheme Year.

Considering the analysis presented in Sections 2 to 3, the Trustees believe that their policies with regard to engagement and the exercise of rights attaching to investments have been successfully followed during the Scheme Year.

2. TRUSTEES' POLICY ON ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (ESG) ISSUES, INCLUDING CLIMATE CHANGE

Policy Summary

The Trustees' ESG policy is outlined in Section 9 of the Scheme's SIP.

The Trustees regularly review Stewardship and Sustainability policies as noted above. If the Trustees find that the relevant policies of Mercer, MGIE or the third-party asset managers do not align with their own beliefs they will notify Mercer. Engagement to seek alignment will be prioritised, then they may consider disinvesting some or all the assets held in the Mercer Funds. They may also seek to renegotiate commercial terms with Mercer.

How the Policy has been implemented over the Scheme Year

The following work was undertaken during the year relating to the Trustees' policy on sustainability integration, including the climate transition and effective stewardship.

Policy Updates	Climate Change Reporting and Carbon Foot printing	Mercer ESG Framework
The Trustees regularly review how sustainability considerations including the climate transition and effective stewardship are integrated within Mercer's, and MGIE's, investment processes and those of the underlying asset managers within the Mercer Funds, in their monitoring process. Mercer, and MGIE, provide reporting to the Trustees on a regular basis.	Mercer's global investment philosophy, which the Trustees have reviewed, recognises that: • Portfolio resilience can be enhanced by integrating financially material sustainability, transition, and socioeconomic risks into investment decision-making.	Mercer's new ESG relevance highlights to what degree ESG factors have the potential to influence Mercer's view of strategies in that asset class, based on the typical impact of ESG Factors on the underlying securities as well as risk return drivers in a portfolio. Each relevant strategy has a binary ESG Indication. A strategy is considered Integrated if Mercer

The Mercer **Sustainability Policy** and **Stewardship Policy** are reviewed regularly. The policies now include nature and biodiversity as key themes and include expanded details on Mercer's Investment Philosophy.

Mercer also regularly reviews its approach to integrating climate considerations into its investment decision-making process as documented in its **Task Force on Climate Related Financial Disclosures (TCFD) report**.

The most recent **UN Principles of Responsible Investment** results (based on 2022 activity) awarded Mercer with 4 out of 5 stars for Policy Governance and Strategy.

Mercer is a member of the TNFD working group and a founding signatory of Nature Action 100. The Financial Reporting Council confirmed in February 2025 that MGIE will remain a signatory to the UK Stewardship Code, based on its application of the 12 principles, which is seen to represent best practice in stewardship.

• Investing to solve long-term systemic issues may provide opportunities to improve risk-adjusted returns.

• Effective stewardship can improve investment outcomes.

Mercer applies each of these three lenses when considering the climate transition, a widely recognised systemic risk. Mercer considers the transition to a low carbon economy, and the physical damages associated with global temperature increases, through its Climate Transition (ACT) framework. This framework assesses portfolio alignment with low-carbon goals and monitors various climate-related metrics.

Mercer has a target of net-zero absolute portfolio carbon emissions by 2050 for UK, European and Asian discretionary portfolios, and relevant multi-client, multi-asset funds domiciled in Ireland. To achieve this, Mercer has set a target to reduce portfolio carbon intensity by 45% from 2019 levels and is on track to meet this goal.
Mercer's climate risk management is consistent with the framework recommended by the Financial Stability Board's Task Force on Climate related Financial Disclosures (TCFD), as described in Mercer's latest Task Force on Climate Related Financial Disclosures Status **Report**.

As of 30 September 2025, Mercer's in-scope portfolios are on track to meet their long-term net zero portfolio carbon emissions reduction targets, with an average of -57% since baseline. (Data Source: MSCI Barra)

believes there is consistency and repeatability in the manager's approach to identifying and assessing material financial ESG risks into their due diligence and investment decisions.

Stewardship continues to form an important part of Mercer's ESG framework, applied during the manager research process.

From Q2 2025 onwards this new integration framework is included in the investment performance reports produced by Mercer on a quarterly basis and reviewed by the Trustees.

Approach to Exclusions

Mercer and MGIE prioritize integration and stewardship but may exclude certain investments based on Mercer's Exclusions Frameworks. Controversial weapons and civilian firearms are excluded from all multi-client funds, while tobacco and nuclear weapons are excluded from active equity and fixed income funds. Additional exclusions are detailed in fund disclosures on Mercer's website.

In addition, Mercer and MGIE monitor funds for high-severity incidences relating to the UN Global Compact (UNGC) Principles that relate to human rights, labour, environmental and corruption issues.

Sustainability-themed investments

An allocation to MGIE's Mercer Passive Sustainable Global Equity UCITS CCF is included within the Scheme portfolio of Growth assets, with the allocation accounting for c.8.5% of the Growth Portfolio.

(1) Environmental considerations may include greenhouse gas reduction, renewable energy, waste reduction, clean water provision, biodiversity or the circular economy. Social considerations may include the reduction of inequality, encouraging social cohesion, fair labour practices, investments in human capital or investments in socially disadvantaged communities.

Diversity

Mercer and the Trustees believe that diverse teams enhance decision-making. As a result, they have implemented several measures to promote diversity within Mercer's portfolio management team, the appointed managers, and across portfolio holdings.

Participation in collaborative initiatives can also support raising awareness and contributing to initiatives across the broader industry.

Mercer Limited is a member of The Diversity Project, which seeks to accelerate progress towards a more inclusive culture in the investment and savings profession.

Mercer is also a member of the 30% Club – UK Investor Chapter and Irish Investor Chapter, which are investor-led initiatives focused on increasing gender diversity on corporate boards and in senior leadership roles.

While Mercer considers various forms of diversity in decision-making, it currently reports specifically on gender diversity.

Engagement

Engagement is an important aspect of Mercer's stewardship activities on behalf of the Trustees. The 2025 Sustainability & Stewardship Report captures Mercer's stewardship approach, activities and outcomes over the calendar year 2024 and is designed to address the 12 principles of the 2020 UK Stewardship Code for investment managers.

Mercer conducts an annual survey on sustainability and stewardship topics. The survey was distributed to over 200 managers appointed in the Mercer Funds. The survey gathers information on managers' broad approach to stewardship as part of their investment integration. It also seeks insights and examples of voting and engagement activities. The results from the survey serve as an important source of information for tracking and measuring managers' stewardship efforts, assessing effectiveness, and identifying potential areas for improvement.

The results and insights from the survey will be shared in Mercer's annual Sustainability and Stewardship Report and a distinct Highlights report. These reports are reviewed by the Trustees providing them with valuable information on the managers' stewardship activities and their alignment with Mercer's objectives.

3. TRUSTEES' POLICY ON EXERCISE OF RIGHTS (INCLUDING VOTING RIGHTS) ATTACHING TO SCHEME INVESTMENTS

The Trustees' policy is as follows:

Delegation of Investment Management:

- The Trustees delegate responsibility for the discretionary investment management of Scheme assets to Mercer. The Scheme assets are invested in a range of Mercer Funds for which MGIE or relevant Mercer affiliate acts as investment manager.

Reporting of Engagement and Voting activities

- For the Trustees to fulfil their obligation regarding voting and engagement, they require reporting on the engagement and voting activities undertaken within the Mercer Funds. This reporting helps the Trustees assess whether the policies align with their own delegation of voting rights.
- Voting rights that apply to the underlying investments attached to the Mercer Funds are delegated to the third-party investment managers appointed by MGIE. MGIE accepts that these managers are typically best placed to exercise voting rights and prioritise particular engagement topics, given their detailed knowledge of the governance and operations of the investee companies. However, Mercer plays a pivotal role in

monitoring the stewardship activities of those managers and promoting more effective stewardship practices, including attention to more strategic themes and topics.

Proxy Voting Responsibility:

- Proxy voting responsibility is given to listed equity investment managers with the expectation that all shares are voted[2] in a timely manner and in a manner deemed most likely to protect and enhance long-term value.
- Mercer and MGIE carefully evaluate each investment manager's stewardship capabilities (engagement and voting activities) as part of the selection process, ensuring alignment with Mercer's commitment to good governance and the integration of sustainability considerations. Managers are expected to take account of current best practice such as the UK Stewardship Code, to which Mercer is a signatory. As such the Trustees do not use the direct services of a proxy voter.

A summary of the voting activity for a range of Mercer Funds in which the Scheme assets are invested in is provided for the year ending 30 September 2025. This may include information in relation to funds that the Scheme's assets were no longer invested in at the year end. The statistics are drawn from the Glass Lewis system (via the custodian of the Mercer Funds). Glass Lewis is a leading provider of governance and proxy voting services.

Fund	Total Proposals		Vote Decision					For/Against Mgmt.		Meetings	
	Eligible Proposals	Proposals Voted On	For	Against	Abstain	No Action	Other	For	Against	No.	Against
Mercer Multi-Asset Credit Fund[(1)]	42	42	100%	0%	0%	0%	0%	100%	0%	3	0%
Mercer Passive Global Equity CCF	19,479	17,019	72%	15%	0%	12%	0%	81%	19%	1342	72%
Mercer Passive Emerging Markets Equity Fund	20,690	19,466	74%	20%	3%	3%	0%	78%	22%	2389	52%
Mercer Passive Sustainable Global Equity UCITS CCF	15,694	15,295	76%	21%	1%	2%	0%	77%	23%	1097	77%

(1) Voting Activity figures for the Mercer Multi-Asset Credit fund relate to a small number of equity holdings within the fund's underlying segregated mandates. Please note this does not include voting activity from any underlying pooled strategies within the fund over the period

(2) There are a number of limited circumstances where voting rights may not be exercised relating to, for example, conflicts of interest, share-blocking markets, power of attorney (POA) markets etc.

– "Eligible Proposals" reflect all proposals of which managers were eligible to vote on over the period
– "Proposals Voted On" reflect the proposals managers have voted on over the period (including votes For and Against, and any frequency votes encompassed in the "Other" category)"
– Vote Decision may not sum to 100 due to rounding. "No Action" reflects instances where managers have not actioned a vote. MGIE may follow up with managers to understand the reasoning behind these decisions, and to assess the systems managers have in place to ensure voting rights are being used meaningfully
– "Other" refers to proposals in which the decision is frequency related (e.g. 1 year or 3-year votes regarding the frequency of future say-on-pay).
– "Meetings No." refers to the number of meetings the managers were eligible to vote at.
– "Meetings Against" refers to the no. of meetings where the managers voted at least once against management, reported as a % of the total eligible meetings.

Significant Votes: The Trustees have based the definition of significant votes in line with the requirements of the Shareholder Rights Directive (SRD) II and on Mercer's engagement priority themes, The *most* significant proposals reported below relate to the three companies with the largest weight in each fund (relative to other companies in the full list of significant proposals), while considering Mercer's engagement priority themes.

Where available, information on next steps and plans to escalate are included in the following table.

Most Significant Votes

Fund	Company *(Holding Weight)*	Meeting Date: Proposal Text *(Significance Category)*	Manager Vote Decision *(Intention to vote against management communicated – Rationale, if available*	Proposal Outcome *(Next steps to report, if any)*
Mercer Passive Global Equity CCF	Apple Inc (5.0%)	25/2/2025: Shareholder Proposal Regarding Abolishing Inclusion and Diversity Program and Policies (Social)	Manager Vote Decision: Against (Intention to vote against management communicated: N/A) Rationale: While the proponent argues that the company's diversity, equity, and inclusion (DEI) initiatives present litigation risks assessing disclosures it is evident that Apple has strong compliance measures and effective oversight of legal and regulatory risks. Additionally, the company maintains clear non-discrimination policies and aligns its oversight with market standards and there are no known controversies regarding employee discrimination linked to Apple's DEI efforts at the time of the AGM. Manager therefore did not support this proposal.	Proposal did not pass (2.3% Support) Next steps to report — Manager will continue to develop its Global Proxy Voting Guidelines and exercise voting rights to reduce portfolio risk and promote sustainable long-term outcomes, despite the contentious nature of DEI this proxy season.
	Microsoft Corporation (4.4%)	10/12/2024: Shareholder Proposal Regarding Report on Risks of Providing AI to Facilitate New Oil and Gas Development and Production (Environmental)	Manager Vote Decision: For (Intention to vote against management communicated: No) Rationale: A vote for this proposal is warranted, as shareholders would benefit from additional disclosure related to the potential risks associated with the use of the company's artificial intelligence and machine learning tools for new oil and gas development and production.	Proposal did not pass (9.7% Support) Next steps to report — Manager engages with Microsoft on the topic of net zero. Deployment of advanced technology for the fossil fuel industry exposes it to material reputational, competitive, and operational risk. Manager intends to continue to monitor the company's progress on the topic or any potential amendments.

Mercer Passive Sustainable Global Equity UCITS CCF	Apple Inc (6.5%)	25/2/2025: Shareholder Proposal Regarding Abolishing Inclusion and Diversity Program and Policies (Social)	Manager Vote Decision: Against (Intention to vote against management communicated: No) Rationale: The company provides several disclosures that relate to diversity and inclusion, and these disclosures appear to provide sufficient information for shareholders to evaluate the programs and policies in question. In addition, the company clearly provides its non-discrimination policies, it clearly discusses the board and management's role in oversight of the associated risks, and there do not appear to be any controversies related to employee diversity initiatives discriminating against employee groups at the company specifically.	Proposal did not pass (2.3% Support) Next steps to report — Manager will continue to vote in line with their published policies and positions.
	Microsoft Corporation (7.0%)	10/12/2024: Shareholder Proposal Regarding Report on Risks of Providing AI to Facilitate New Oil and Gas Development and Production (Environmental)	Manager Vote Decision: Against (Intention to vote against management communicated: No) Rationale: A vote against this resolution is warranted. The concerns by the proposal raised do not present significant material risks at this time. The company provides sufficient disclosure on its approach to providing services to energy sector customers.	Proposal did not pass (9.7% Support) Next steps to report — (N/A)

Note, there are no proposals met the criteria for significant votes for the Mercer Passive Emerging Markets Equity Fund over the period. In addition, there is no voting information available for the Scheme’s Synthetic Equity fund holding due to the nature of the fund.