

Implementation Statement

Timbmet Group Pension Fund

Purpose of this statement

This implementation statement has been produced by the Trustee of the **Timbmet Group Pension Fund (“the Scheme”)** to set out the following information over the year to **31 March 2025** (the Scheme’s year-end).



how the Trustee’s policies on exercising rights (including voting rights) and engagement activities have been followed over the year;
the voting activity undertaken by the Scheme’s investment manager on behalf of the Trustee over the year, including information regarding the most significant votes.



Conclusions

In reviewing the activities of the past year, the Trustee believes that the policies set out in the Statement of Investment Principles (“SIP”) have been effectively implemented. The Scheme’s investment manager has demonstrated transparency in their voting and engagement activities.

Based on the information received, the Trustee believes that the investment manager has acted in accordance with the Scheme’s policies on exercising rights (including voting rights) and engagement activities. The Trustee is supportive of the key voting action taken by the investment manager over the period to encourage positive governance changes in the companies in which the investment manager holds shares.

Stewardship policy

The Trustee’s SIP in force at March 2025 describes the Trustee’s stewardship policy on the exercise of rights (including voting rights) and engagement activities. It was last reviewed in September 2023 and has been made available online here:

https://www.timbmet.com/wp-content/uploads/2022/02/Timbmet_Statement-of-Investment-Principles-SIP.pdf

At this time, the Trustee has not set stewardship priorities or themes for the Scheme but will be considering the extent that they wish to do this in due course, in line with other Scheme risks.

How voting and engagement/stewardship policies have been followed

Based on the information provided by the Scheme's investment manager, the Trustee believes that its policies on voting and engagement have been met in the following ways:

- The Scheme invests entirely in pooled funds, and as such delegates responsibility for carrying out voting and engagement activities to the Scheme's investment manager.
- The Trustee, with input from their investment consultant, annually receives and reviews (through their Implementation Statement), the voting information and engagement policies of their investment manager to ensure alignment with their own policies. The Trustee believes that the voting and engagement activities undertaken by the investment manager on their behalf have been in the members' best interests.
- As part of annual monitoring of the Scheme's investment manager, the Trustee uses ESG ratings information provided by its investment consultant to assess how the Scheme's investment manager takes account of ESG issues.
- Having reviewed the above in accordance with their policies, the Trustee is comfortable the actions of the investment manager are in alignment with the Scheme's stewardship policies.

Approved by the Trustee of the Timbmet Group Pension Scheme on 11 September 2025

Voting Data

This section provides a summary of the voting activity undertaken by the investment manager on behalf of the Trustee over the year to 31 March 2025. The Buy and Maintain Credit Fund, Global Unconstrained Bond Fund (formerly the Absolute Return Bond Fund) and Liability Driven Investment (LDI) Funds with Legal & General Asset Management (“L&G”) have no voting rights and limited ability to engage with key stakeholders given the nature of the mandate. Therefore, they have been excluded from this section.

Please note that the Scheme also invests in one illiquid fund with SEI Investments (SEI) which represents less than 1% of the total portfolio. Full redemption instructions have been placed following significant strategy changes in 2023, however there is a queue for these funds to be sold. As the Scheme is in the process of selling the holdings and they do not represent part of the Scheme’s strategic allocation, no data has been shown for these.

Manager	Legal & General Asset Management
Fund name	Future World Global Equity Index Fund (GBP hedged)
Structure	Pooled
No. of eligible meetings	5,515
No. of eligible votes	55,096
% of resolutions voted	99.8%
% of resolutions abstained	1.1%
% of resolutions voted with management¹	81.0%
% of resolutions voted against management¹	17.9%
Proxy voting advisor employed¹	International Shareholder Service (“ISS”)
% of resolutions voted against proxy voter recommendation	9.7%



Proxy voting

The below summarises how the investment manager utilises their proxy voting services.

¹ As a percentage of the total number of resolutions voted on. Totals may not add up to 100%. Numbers are subject to rounding.

Note: Pooled fund structures result in limited scope for the Trustee to influence managers’ voting behaviour.

L&G

L&G's Investment Stewardship team uses ISS's electronic voting platform to electronically vote clients' shares. All voting decisions are made by L&G and they do not outsource any part of the strategic decisions. To ensure their proxy provider votes in accordance with L&G's position on ESG, L&G have put in place a custom voting policy with specific voting instructions. L&G review their custom voting policy with ISS annually and take into account feedback from their investors.



Significant votes

At this time, the Trustee has not set stewardship priorities or themes for the Scheme, but will be considering the extent that they wish to do this in due course, in line with other Scheme risks. So, for this Implementation Statement, the Trustee has asked the investment manager to determine what they believe to be a "significant vote". The Trustee has not communicated voting preferences to their investment manager over the period, as the Trustee is yet to develop a specific voting policy. In future, the Trustee will consider the most significant votes in conjunction with any agreed stewardship priorities or themes.

Legal & General have provided a selection of votes which they believe to be significant. In the absence of agreed stewardship priorities, the Trustee has selected 3 votes for each fund with voting rights, that cover a range of themes to represent what it considers the most significant votes cast on behalf of the Scheme. To represent the most significant votes, the votes of the largest holdings relating to each topic are shown below.

A summary of the significant votes provided is set out below.

L&G | Future World Global Equity funds (incl. GBP hedged)

	Vote 1	Vote 2	Vote 3
Company name	Microsoft Corporation	Amazon.com, Inc.	Meta Platforms, Inc.
Date of vote	10 December 2024	22 May 2024	29 May 2024
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	4.9%	1.8%	1.3%
Summary of the resolution	Report on AI data sourcing accountability	Report on customer due diligence	Elect Director Peggy Alford
How the manager voted	For	For	Against
Rationale for the voting decision	Governance: L&G believe that a vote for this resolution is warranted as the company is facing increased legal and reputational risks related to copyright infringement associated with its data sourcing practices. While the company has strong disclosures on its approach to responsible	Human Rights: A vote in favour is applied as enhanced transparency over material risks to human rights is key to understanding the company's functions and organisation. While the company has disclosed that they internally review these for some products and has utilised appropriate	Independent Director: L&G expects companies to elect an independent lead director where there is a combined Board Chair and CEO.

	Vote 1	Vote 2	Vote 3
	AI and related risks, shareholders would benefit from greater attention to risks related to how the company uses third-party information to train its large language models.	third parties to strengthen their policies in related areas, there remains a need for increased, especially publicly available, transparency on this topic.	
Outcome of the vote	Fail	N/A (Results not disclosed)	N/A (Results not disclosed)
Implications of the outcome	L&G will continue to engage with their investee companies, publicly advocate their position on these issues and monitor company and market-level progress		
Criteria on which the vote is considered "significant"	High Profile meeting: This shareholder resolution is considered significant due to the relatively high level of support received.	High-Profile Meeting: This shareholder resolution is considered significant as one of the largest companies and employers not only within its sector but in the world, L&G believe that Amazon's approach to human capital management issues has the potential to drive improvements across both its industry and supply chain.	Diversity: L&G views gender diversity as a financially material issue for their clients, with implications for the assets they manage on their behalf.



Engagement

The investment manager may engage with investee companies on behalf of the Trustee. The table below provides a summary of the engagement activities undertaken by each manager during the year for the relevant funds.

Engagement activities are limited for the Scheme's LDI funds due to the nature of the underlying holdings, so engagement information for these assets have not been shown. There is also no data shown for the one illiquid fund with SEI as noted previously.

Manager	Legal & General Investment Management		
Fund name	Buy and Maintain Credit Fund	Global Unconstrained Bond Fund (formerly Absolute Return Bond Fund)	Future World Global Equity Index Fund GBP Hedged
Number of entities engaged on behalf of the holdings in this fund in the year	182	180	1,278
Number of engagements undertaken on behalf of the holdings in this fund in the year	331	355	1,944
Number of engagements undertaken at a firm level in the year		4,459	



Examples of engagement activity undertaken over the year to 31 March 2025

L&G

Nippon Steel

One example of L&G's engagement is regarding climate disclosures in Japan. L&G engaged with Nippon Steel, the largest steel maker in Japan, regarding their disclosures of climate-related and decarbonisation-related policy positions.

Given the highly carbon intensive nature of the steelmaking industry, Nippon Steel's role as one of the largest global steelmakers and the significant role Nippon Steel has in influencing Japanese policy, L&G have engaged repeatedly with Nippon Steel to encourage further climate policy disclosures. Despite previous engagements, L&G remained unsatisfied with the disclosures provided so far and as such filed a shareholder resolution that would require Nippon Steel to "Disclose annually, climate-related and decarbonisation-related policy positions and lobbying activities globally".

Although the shareholder resolution did not pass, it achieved nearly 28% support, one of the highest levels of support recorded for a climate-related shareholder resolution in Japan, demonstrating to the company that investors expect greater transparency on climate-related engagement activity.

IIGCC: Climate Transition Working Group

L&G has been an active member of the Institutional Investors Group on Climate Change (IIGCC) since 2011. As part of its commitment to advancing the net zero transition, L&G participates in several of the IIGCC's initiatives, including the Climate Action 100+, Nature Action 100, and the Net Zero Asset Managers initiative. Through these partnerships, L&G contributes to collective investor efforts aimed at aligning the real economy with the goals of the Paris Agreement.

As a member of the IIGCC Climate Transition Working Group, L&G plays an active role in reviewing and providing feedback on draft methodologies developed by the IIGCC, particularly those relating to carbon measurement, target setting, and benchmarking. This engagement is essential to ensure that the frameworks being developed are robust, actionable, and reflective of the practical challenges investors face, especially in relation to complex areas such as Scope 3 emissions.

In the final quarter of 2024, L&G participated in the latest Working Group meeting, where it contributed to discussions on the evolving methodologies and shared insights alongside other asset managers. During this session, the IIGCC also presented new guidance on assessing decarbonisation targets for gas within utility companies – a key area of interest given the sector's role in the energy transition. This guidance has since been published and will inform future corporate assessments.

Given the IIGCC's significant influence across both the corporate landscape and public policy dialogue, L&G will continue to contribute to the Climate Transition Working Group. Looking ahead, L&G intends to support the development of further guidance in areas such as nature-related risks and carbon lock-in, where infrastructure investment decisions may extend reliance on fossil fuels. L&G recognises the importance of this collaborative policy engagement in shaping a more sustainable and resilient financial system.