Implementation Statement for the Gulf Air Retirement Benefits Scheme

Purpose of this statement

This implementation statement has been produced by the Trustee of the Gulf Air Retirement Benefits Scheme (the Scheme) and sets out the following over the year to 31 December 2025:

- How the Trustee's policies on exercising rights (including voting rights) and engagement policies have been followed over the year.
- The voting activity undertaken by the Scheme's investment managers on behalf of the Trustee over the year, including information regarding the most significant votes.
- A summary of any changes to the Statement of Investment Principles (SIP) over the period.
- A description of how the Trustee's policies, included in their SIP, have been followed over the year.

Stewardship policy

The Trustee's Statement of Investment Principles (SIP) in force at year-end describes the Trustee's stewardship policy on the exercise of rights (including voting rights) and engagement activities. It was last reviewed in December 2024 and has been made available online here:

https://www.zedra.com/wp-content/uploads/2025/01/Gulf_Air_Retirement_Benefits_Scheme_SIP2024.pdf

Given that the Trustee has delegated all voting and engagement activities to the Scheme's underlying investment managers, and the Scheme's only allocation with equity exposure is within the Columbia Threadneedle Dynamic Real Return Fund, the Trustee has agreed to set the Scheme's stewardship priorities to be based on Columbia Threadneedle's stewardship priority themes. The Trustee feels that this is a pragmatic approach for the Scheme given the potential proximity to buy-out. Upon reviewing Columbia Threadneedle's stewardship policy, the Trustee agreed to set the following themes to be the Scheme's stewardship priorities:

- Climate Change
- Environmental Stewardship (including biodiversity)
- Corporate Governance

These principles include researching companies, identifying any issues and then engaging with them as necessary.

How the SIP has been followed over the year

In the Trustee's opinion, the SIP was followed over the year by:

- The Trustee monitors the performance of the Scheme's funds quarterly to ensure that they are meeting their stated objectives.
- Outside of the quarterly reporting cycle, the Scheme's investment consultant informs them of any significant developments with the investment managers.

How voting and engagement policies have been followed

At year-end, the Scheme's investment managers were Legal and General Asset Management ("L&G"), Columbia Threadneedle Investment ("Columbia Threadneedle") and Baring Asset Management ("Barings"). The assets held with L&G and Columbia Threadneedle were managed via the L&G Investment Only Platform.

Based on the information provided by the Scheme's investment managers, 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 the Trustee delegates responsibility for carrying out voting and engagement activities to the Scheme's fund managers;
- Having reviewed the above in accordance with their policies, the Trustee is comfortable the actions of the fund managers are in alignment with the Scheme's stewardship policies.

Further information on voting and engagement can be found in the remainder of this document.

This statement was approved by The Trustee of the Gulf Air Retirement Benefits Scheme on 01 July 2026

Voting Data

This section provides a summary of the voting activity undertaken by the fund managers on behalf of the Scheme over the year to 31 December 2025.

There are no voting rights attached to the Scheme's investments in Barings Global High Yield Credit Strategies Fund, L&G LDI Funds and L&G Sterling Liquidity Fund, therefore no voting data is shown for these assets. Voting data for the relevant funds are summarised in the table below.

Manager	Columbia Threadneedle
Fund name	Dynamic Real Return Fund
Structure	Pooled
Ability to influence voting behaviour of manager	The pooled fund structure means that there is limited scope for the Trustees to influence the manager's voting behaviour.
Meetings the manager was eligible to vote at	198
Resolutions the manager was eligible to vote on	2,851
Percentage of resolutions the manager voted on	100.0%
Percentage of votes that were *with* management	94.1%
Percentage of votes that were *against* management	5.5%
Percentage of votes that were abstentions	0.4%
Proxy voting advisors (if applicable)	ISS*
Percentage of votes contrary to the recommendation of the proxy advisor	n/a*

**Columbia Threadneedle cast votes on a proxy voting platform hosted by ISS. In addition, Columbia Threadneedle utilise the proxy voting research of Glass Lewis & Co, ISS and IVIS.*

Significant votes

Columbia Threadneedle have provided a selection of votes which they believe to be significant. The Trustee has selected 3 of the most significant votes which relate to the stewardship priorities of the Scheme where available. These votes are displayed below.

Columbia Threadneedle Dynamic Real Return Fund

	Vote 1	Vote 2	Vote 3
Company name	Charter Communications	Elevance Health	NVIDIA Corporation
Date of vote	22 April 2025	14 May 2025	25 June 2025
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	0.1%	0.1%	2.2%

Summary of the resolution	Report on Political Contributions	Report on Effectiveness of Diversity, Equity, and Inclusion Efforts	Enhance Workforce Data Reporting
How the manager voted	For	Abstain	Abstain
If the vote was against management, did the manager communicate their intent to the company ahead of the vote?	No	No	No
Rationale for the voting decision	Columbia Threadneedle believe that comprehensive, aggregate disclosure on political spending is best practice. They believe that disclosure should include all state and local donations including support for organisations and ballot initiatives. In addition, they believe the company should identify key relationships with trade associations that engage in lobbying on the corporation's behalf, as well as describe its policies and processes for giving.	At the time of the vote, Columbia Threadneedle believe management and the board are adequately considering attendant material risks.	Columbia Threadneedle believe the company should disclose its demographic workforce data as per the EEO-1 requirement. This will help to increase transparency and aid shareholders in assessing the effectiveness of the company's stated efforts to address related human capital material risks and opportunities.
Outcome of the vote	Fail	Fail	Fail
Implications of the outcome	Active stewardship (engagement and voting) continues to form an integral part of Columbia Threadneedle's research and investment process.		
Criteria on which the vote is considered "significant"	Columbia Threadneedle consider a significant vote to be any dissenting vote, i.e. where a vote is cast against (or where they abstain/withhold from voting) a management-tabled proposal, or where they support a shareholder-tabled proposal not endorsed by management.		

Engagement data

The investment managers 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 L&G LDI Funds due to the nature of the underlying holdings, so engagement information for these assets have not been shown.

Manager	Columbia Threadneedle	Barings	L&G
Fund name	Dynamic Real Return Fund	Global High Yield Credit Strategies Fund	Sterling Liquidity Fund
Does the manager perform engagement on behalf of the holdings of the fund?	Yes	Yes	Yes
Has the manager engaged with companies to influence them in relation to ESG factors in the year?	Yes	Yes	Yes
Number of engagements undertaken at a fund level	444	152	28
Number of entities engaged at a fund level	214	110	21
Number of engagements undertaken at a firm level	1,069	394	3,114

Examples of engagement activity undertaken over the year

Fund	Engagement example
Columbia Threadneedle Dynamic Real Return Fund	**Amazon.com Inc** – Columbia Threadneedle met with Amazon to discuss their views on the impact of potential trade policies, their human capital strategy, and their water and energy strategy for Amazon Web Services (AWS) data centres. Regarding potential import tariffs on Chinese goods in the US, Amazon believe that compliance would primarily lie with third-party sellers in their supply chain, potentially affecting supply chain resilience to some extent. On human capital management, Amazon have implemented several feedback channels and robotics to improve working conditions in fulfilment centres. However, Columbia Threadneedle encouraged the company to identify and disclose metrics to assess the effectiveness of these measures, such as tracking and resolving material grievances. In relation to AWS data centres, Amazon consider siting decisions aligned with customer expectations and resource availability. On energy management, the company works on the principle of additionality (i.e. it aims to add renewable and clean power capacity where it is most impactful and cost-effective and offset that against energy usage) versus 24/7 matching of energy usage to renewable energy generated on the local grid. Amazon have also built a water risk dashboard based on assessments in order to prioritise regions for greater water saving and recycling intervention. Columbia Threadneedle are encouraged by Amazon's long-term net-zero and water-positive goals, as well as its efforts to improve working conditions and human capital management. However, they believe these commitments should be validated by interim, publicly disclosed targets in order to more effectively assess progress. They intend to continue their engagements in order to drive further transparency and accountability on material ESG issues across Amazon’s operations and supply chain.
Barings Global High Yield Credit Strategies Fund	**American Airline** – Barings engaged with American Airlines to assess progress against its stated climate commitments and to better understand the credibility of its emissions reduction pathway. The discussion focused on the company’s interim and long-term targets, the drivers of recent emissions trends, and the role of fleet modernisation, sustainable aviation fuel (SAF), and emerging technologies in achieving its decarbonisation objectives.

	In the last quarter of 2025, representatives from Barings met with the company's Chief Sustainability Officer, alongside members of the Investor Relations and Corporate Secretary teams. The company outlined its emissions performance, noting that absolute emissions increased in 2024 due to business growth and limited SAF availability. Management emphasised the central role of SAF in its longer-term decarbonisation strategy, while acknowledging challenges related to affordability, scalability, and supply. Longer-term, the company expects alternative propulsion technologies, such as electric, hybrid, and hydrogen aircraft, to play a limited but complementary role. Barings gained increased comfort around the company's near-term focus on fleet efficiency as a credible driver of emissions reductions, as well as a clearer understanding of the structural challenges facing SAF adoption. While absolute emissions increased in 2024, this was assessed to be consistent with growth dynamics rather than a weakening of climate ambition. Overall, the engagement indicated that the company remains aligned with its interim emissions reduction targets, subject to continued execution. Barings will review the company's 2025 sustainability report once published to assess further progress against stated targets, particularly regarding SAF uptake and fleet renewal. Barings intend to continue the dialogue with the company in the second half of 2026, with a focus on tracking delivery against interim milestones and developments in SAF availability and infrastructure.
L&G* Sterling Liquidity Fund	**Microsoft** – Microsoft play a significant role in shaping how artificial intelligence is integrated into the global economy, given the reach of its software and cloud services. Because of this influence, stakeholders expect strong transparency around how the company uses AI and manages associated risks. With Microsoft's vast digital operations, human rights risks – both within the company and across its value chain – remain substantial, making improvements in governance and disclosure essential. L&G's engagement with Microsoft on AI governance began in 2023, following the release of L&G's 'safe AI' expectations, and the company has generally been viewed as a leader in transparency among major technology firms. Ahead of the company's 2025 AGM, discussions focused on shareholder proposals concerning AI, data governance, and human rights. While L&G opposed two human-rights-related resolutions due to Microsoft's recent corrective actions, L&G supported a proposal requesting more detailed reporting on AI data usage oversight, particularly in light of evolving regulations and increased legal and reputational risks linked to data sourcing practices. Microsoft have strengthened its transparency on responsible AI governance and human rights in recent years, but there is still scope to improve data governance disclosures, particularly around government requests for content removal and user information. Microsoft's recent updates to its internal risk-classification processes – clarifying which projects require enhanced human rights due diligence – are positive steps, and L&G will continue to monitor progress in these areas. These engagements help L&G understand the challenges companies face on rapidly evolving topics while reinforcing the financial relevance of these risks, and they look forward to continued dialogue on AI governance and environmental issues.

**Engagement example provided at the company level.*