

Implementation Statement

Seventh-day Adventist Retirement Plan

Purpose of this statement

This implementation statement has been produced by the Trustees of the Seventh-Day Adventist Retirement Plan ("the Plan") to set out how the Trustees' policies on exercising rights and engagement activities have been followed over the year over the year to 5 April 2025.

The report does not cover the voting activity undertaken by the Plan's investment manager on behalf of the Trustees over the year, because there are no voting rights attached to the underlying assets in the funds the Plan held over the accounting year.

Stewardship policy

The Trustees' Statement of Investment Principles (SIP) in force at 5 April 2025 describes the Trustees' stewardship policy on engagement activities. It is available online here:

<https://buc-secretariat.adventist.uk/> Given the Plan solely invests through pooled investment vehicles where the Plan's assets only represent a small proportion of the capital invested in the funds, the Trustees only considered the stewardship priorities of the fund manager – Legal & General, and selected their stewardship themes as the stewardship priorities of the Plan, including diversity, climate change, income inequality, and health, etc.

How engagement/stewardship policies have been followed

Based on the information provided by the Plan's investment managers, the Trustees believe that their policies on voting and engagement have been met in the following ways:

- The Plan invests entirely in pooled funds, and as such delegates responsibility for carrying out voting and engagement activities to the Plan's fund managers.
- Annually, the Trustees receive and review engagement policies from the asset manager.
- Legal and General asset management ("L&G") attended the Trustee meeting on 20 June 2024 and included a discussion on ESG and stewardship as part of their presentation. The Trustees reviewed L&G's stewardship priorities and adopted them as stewardship priorities of the Plan.

Having reviewed the above in accordance with their policies, the Trustee is comfortable that the actions of the fund manager are in alignment with the Fund's stewardship policies.

Fund level engagement

The investment manager, L&G, may engage with their investee companies on behalf of the Trustee. The table below provides a summary of the engagement activity undertaken by the manager during the year. The data provided by L&G is at a firm level.

Manager	L&G
Fund name	2035-Index Linked Gilt Fund 2037 Index-Linked Gilt Fund 2040 Index-Linked Gilt Fund 2042 Index-Linked Gilt Fund 2050 Index-Linked Gilt Fund 2055 Index-Linked Gilt Fund 2058 Index-Linked Gilt Fund 2062 Index-Linked Gilt Fund 2068 Index-Linked Gilt Fund 2073 Index-Linked Gilt Fund Future World Net Zero Buy and Maintain Fund Distribution
Has the manager engaged with companies to influence them in relation to ESG factors in the year?	Yes
Number of engagements undertaken at a firm level in the year	4,459*
Number of companies the manager engaged with at a firm level during the year	4,210*
Examples of engagements undertaken at a firm level	Top engagement topics include: <ul style="list-style-type: none"> - Climate Change - Deforestation - Remuneration - Human Rights - Climate Mitigation

*The engagement data for the funds are given for the 12 months to 31 March 2025.

Examples of engagement activity undertaken over the year to 5 April 2025

L&G (Firm-level)

Petroleos Mexicanos (Pemex): L&G engaged with Pemex to discuss their management of methane emissions which have been an area of concern across their supply chain.

L&G have been a contributing investor to the CA100+engagements with Pemex since 2023. In helping to establish a productive dialogue between the company and its investors, they encouraged the company to take a number of steps towards clear disclosures, oversight of climate risk at board level, and the setting of ambitious but achievable climate targets. Following successive engagements, the company published its first Sustainability Plan, setting out clear targets for emissions reduction, enhanced disclosure (aligned with TCFD and ISSB recommendations), allocation of capital towards achieving climate goals, and addressing methane emissions within their operations.

The publication of Pemex's first Sustainability Plan demonstrates, L&G believe, positive commitments regarding emissions reduction targets, disclosures, capital allocation and managing and mitigating methane emissions risks.

Policy engagement – Timing of annual disclosures in Japan: On 28 March 2025, the Japan Financial Services Agency (FSA) requested all 4,000 listed companies in Japan to publish their annual securities reports (Yuho) before their AGMs. The Yuho contains the fully audited financial statements and other important governance and sustainability related information, which investors need to make informed voting decisions. However, more than 90% of Yuhos are currently published the day of or a few days after the AGM.

L&G's work on this topic over the years has ranged from direct and collective engagements, speaking with media, and making their views clear through the L&G blog. Over the year, engagements have included meetings with the FSA, Tokyo Stock Exchange, and the Ministry of Economy, Trade and Industry (METI) arranged by International Corporate Governance Network (ICGN) where L&G were given the opportunity to lead the conversation on behalf of fellow members on this topic.

As the FSA acknowledges, the finance minister's latest request to publish the Yuho "a day before or a few days before the AGM" is just the first step but L&G believe it is an encouraging development regarding a long-standing issue. Whilst L&G understand the initial challenges for companies, they will continue their engagement with regulators and companies to help drive further change as they believe that real governance and investor dialogue improvements will only be possible if Yuhos are published three to four weeks before the AGM.

Summary

Based on the information received, the Trustee believes that the fund manager has acted in accordance with the Fund's stewardship policies. The Trustee is supportive of the engagement activities undertaken by the fund manager over the period to encourage positive governance changes.

**Prepared by the Trustees of the Seventh-day Adventist Retirement Plan
June 2025**