Ecclesiastical Insurance Office Plc Staff Retirement Benefit Fund – Annual Engagement Policy Implementation Statement

Introduction

This statement sets out how, and the extent to which, the Engagement Policy in the Statement of Investment Principles ('SIP') produced by the Trustees has been followed during the year to 31 December 2025 (the 'Fund Year'). This statement has been produced in accordance with the Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018, the subsequent amendment in the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019 and the statutory guidance on reporting on stewardship in the implementation statement dated 17 June 2022.

The SIP may be accessed online at https://www.ecclesiastical.com/media/qf3ngwhq/statement-of-investment-principles.pdf

Investment Objectives of the Fund

The Trustees believe it is important to consider the engagement policy in place in the context of the investment objectives they have set. The objectives of the Fund included in the SIP are as follows:

- to ensure that the Fund can meet the members' entitlements under the Trust Deed and Rules as they fall due;
- to reduce the risk of the assets failing to meet the liabilities over the long term;
- to manage the expected volatility of the returns achieved in order to control volatility in the Fund's overall funding level.

Policy on ESG, Stewardship and Climate Change

The Fund's SIP includes the Trustees' policy on Environmental, Social and Governance ('ESG') factors, stewardship and Climate Change. This policy sets out the Trustees' beliefs on ESG and climate change and the processes followed by the Trustees in relation to voting rights and stewardship. This was last reviewed in September 2022.

In 2020, the Trustees commenced a review of their ESG policy, and revised the Responsible and Sustainable Investment Policy with regards to the Fund's equity exposure. This includes an "absence of harm" screening process, excluding companies whose activities may be inconsistent with the wider values of the Fund's beneficiaries, as well as an aspiration to reduce the portfolio's carbon intensity over time. Full details are outlined in the SIP. Where they are not covered by the Responsible and Sustainable Investment Policy, the Trustees have given their appointed investment managers full discretion in evaluating ESG factors, including climate change considerations, and exercising voting rights and stewardship obligations attached to the investments, in accordance with their own corporate governance policies and current best practice, including the UK Corporate Governance Code and UK Stewardship Code.

The following sets out how the Trustees' engagement and voting policies were followed and implemented during the year.

Engagement

- The Trustees requested that the investment managers confirm compliance with the principles of the UK Stewardship Code. Both of the Fund's investment managers confirmed that they are signatories of the UK Stewardship Code.
- The Trustees received details of relevant engagement activity for the year to 31 December 2025 from EdenTree, covering a wide range of different issues, including ESG factors. Examples of this are given below. Insight manages a portfolio of Liability Driven Investments ("LDI") pooled funds for which engagement activities are not directly applicable.
- EdenTree engaged in 134 ESG issues during the year. EdenTree categorises its engagements as two main types: thematic (those that EdenTree deem to be material to the long-term value of our investments, and where they view their engagement as being able to drive real-world, positive change) and fact-finding (to seek further information from current and potential holding companies and issuers). The former accounted for 73% of all engagements over 2025, while the latter totalled 27% of the engagements over the year.
- Within each main type of engagement, EdenTree focus on specific areas. We set out below the breakdown of engagement areas over the year:

Engagement types	% breakdown	Engagement type priorities
Thematic	73%	- Just Climate transition (39%) - Water Stress (17%) - Social & Financial Inclusion (29%) - Good Governance (15%)
Fact-finding	27%	- Controversy Related (33%) - Assessment Related (33%) - ESG & Impact Monitoring (33%)

Voting Activity

The Trustees have delegated their voting rights to the investment managers.

Investment managers are expected to provide voting summary reporting on a regular basis, at least annually. The Trustees did not use the direct services of a proxy voter over the year.

Significant Votes

The Trustees have defined 'significant votes' as those which relate to material holdings (more than c.1% of EdenTree's equity portfolio, including listed infrastructure and UK preference shares) in the areas of climate change (Environmental), human rights (Social) and Board composition/remuneration (Governance).

Over the last 12 months, the key voting activity on behalf of the Trustees was as follows:

EdenTree

All voting was contracted out to proxy advisor Glass Lewis & Co who have delegated authority to vote on EdenTree's behalf. The votes undertaken over 2025 are summarised below.

Number of meetings in which the manager was eligible to vote	Number of resolutions voted on	% of votes against management	% of votes abstained	Reason for vote against management/ abstention
88	1,456	20%	1%	-Remuneration (32%) - Directors (48%) - Shareholder Capital (3%) - Other (16%)

Examples of 'significant votes' over 2025 are included below.

<table>
<tr><th>Holding details[1]</th><th>Why the Trustees consider the vote to be 'most significant'</th><th>EdenTree voting decision</th><th>Was intention to vote against communicated to the company ahead of the vote?</th><th>Rationale for EdenTree voting decision</th><th>Outcome of the vote and any relevant next steps</th></tr>
<tr><td rowspan="4">Company name: Apple Inc

Approximate size of the holding as at the date of the vote: 1.1%

Date of vote: 25/02</td><td>Elect Susan L. Wagner</td><td>Against</td><td>No</td><td>Board independence: non-independent sub-committee Chairs, may compromise alignment with shareholder interests. EdenTree hold the nomination committee Chair responsible for this; Board effectiveness: retirement policy waivered, the manager believes the board should follow through on its policy</td><td>The resolution passed</td></tr>
<tr><td>Shareholder Proposal Regarding Abolishing Inclusion and Diversity Program and Policies</td><td>Against</td><td>No</td><td>Shareholder proposal: vote against as the proposal serves to undermine company's sustainability commitments, which is not aligned with the interest of long-term investors</td><td rowspan="3">The resolutions did not pass

In the first quarter of 2026, EdenTree signed a collaborative investor letter to the chair of Apple's nominating and governance committee, seeking dialogue on board-level oversight of water-related risks. The engagement focused on how Apple identifies and mitigates supply chain water risks, how its water quantity goals contribute to resilience at facility, supplier and basin level, and how wastewater quality is monitored and assessed across the supply chain. This engagement escalated investor expectations on water governance to board level and set out clear asks for greater transparency on how Apple manages material operational and supply chain risk</td></tr>
<tr><td>Shareholder Proposal Regarding Report on Discrimination Risk of Charitable Contributions</td><td>Against</td><td>No</td><td>Shareholder proposal: vote against as EdenTree will not support extraneous requests regarding an issue that is not considered a material risk to the company or sector</td></tr>
<tr><td>Shareholder Proposal Regarding Report on Risks of AI Data Sourcing</td><td>For</td><td>n/a</td><td>Shareholder proposal: vote in favour as the proposal contains reasonable requests and adoption would benefit shareholders</td></tr>
</table>

Company name: AstraZeneca **Approximate size of the holding as at the date of the vote:** 1.3% **Date of vote:** 11/04	Elect Marcus Wallenberg	Against	Yes	Board commitment: director is overcommitted, which may prevent them from effectively carrying out their duties. Director Wallenberg missed 1 board meeting, 3 science meetings and 1 sustainability committee meeting over the period. He also holds 4 additional public directorships and serves as a chair on two of these. In addition, last year's AGM saw Director Wallenberg receive a 22% opposition to his re-election. As such EdenTree believe his overboarding is preventing him from carrying out his duties to the Board at AstraZeneca	The resolution passed
	Elect Philip Broadley	Against	Yes	Board commitment: Director is potentially overcommitted, which may prevent them from effectively carrying out their duties as a sub-committee Chair. Director Broadley missed two remuneration committee meetings, and a nomination and governance meetings over the period. The director holds 2 additional company directorships and is a chair on one. As such EdenTree believes his overboarding is of shareholder concern	The resolution passed
	Remuneration Report	Against	Yes	Remuneration, performance measurement: double dipping across STI and LTI, rewarding one achievement twice. Remuneration, poor practice: Structure allows for excessive pay opportunity	The resolution passed
Company name: Microsoft Corp **Approximate size of the holding as at the date of the vote:** 2.4% **Date of vote:** 05/12	Elect Satya Nadella	Against	No	Board independence: combined CEO / Chair position. The separation of the board chair and CEO role is fundamental as it increases the board's independence from management and mitigates the risk of both agency conflict and potentially compromised decision making procedures	The resolution passed
	Shareholder Proposal Regarding Censorship Risk Audit	Against	n/a	Shareholder proposal: vote against as the company's existing disclosures and management approach are considered sufficient	The resolution did not pass
	Shareholder Proposal Regarding GenAI Discrimination	Against	n/a	Shareholder proposal: vote against as the company's existing disclosures and management approach are considered sufficient	The resolutions did not pass Alongside EdenTree voting action in 2025, they engaged with Microsoft on responsible technology use, human rights due diligence and safeguards for higher-risk uses of its cloud and AI infrastructure. They asked the company for further clarity on its review processes, terms of service enforcement and oversight of sensitive customer use cases. Following its own review, Microsoft took steps to address the identified concerns and continue to monitor progress. In 2026, EdenTree is working with the WBA Digital CIC for Ethical AI collaborative engagement group, focusing on responsible AI governance, transparency and human rights risk management
	Shareholder Proposal Regarding Report on AI Human Rights Due Diligence	Abstain	No	Shareholder proposal: EdenTree agrees with the issue addressed, however the company is demonstrating responsiveness to the matters raised by the proponent through a variety of measures. This includes publishing an executive summary of a new human rights impact assessment on gen AI and a Human Rights Transparency Report	
	Shareholder Proposal Regarding Report on Risks of Providing AI to Facilitate New Oil and Gas Development and Production	Against	n/a	Shareholder proposal: EdenTree agrees with the issue addressed, however the additional disclosure requested is unlikely to improve shareholders' understanding of the company's management	
	Shareholder Proposal Regarding Report on Siting in Countries of Significant Human Rights Concern	For	Yes	Shareholder proposal: vote in favour as the proposal contains reasonable requests and adoption would benefit shareholders	

Company name: Broadcom Inc **Approximate size of the holding as at the date of the vote:** 1.1% **Date of vote:** 21/04	Advisory Vote on Executive Compensation	Against	No	Remuneration, poor practice: remuneration is not aligned to shareholder best practice. Excessive awards for the CEO	The resolution passed
	Elect Harry L. You	Against	No	Remuneration, poor practice, director is chair of the compensation committee, and compensation over the past 24 months has been extremely excessive and not aligned to shareholder interests. Board, commitment: director is potentially overcommitted, which may prevent them from effectively carrying out their duties as a sub-committee Chair. Board, commitment: director is potentially overcommitted, which may prevent them from effectively carrying out their duties	The resolution passed
Company name: Visa Inc **Approximate size of the holding as at the date of the vote:** 1.5% **Date of vote:** 28/01	Shareholder Proposal Regarding Mandatory Director Resignation Policy	For	No	Adoption of the proposal could enhance board accountability	The resolution did not pass
	Shareholder Proposal Regarding Report on Benefits and Health Program Gaps	Against	No	EdenTree will not support extraneous requests regarding an issue that is not considered a material risk to the company or sector	The resolution did not pass
Company name: Sanofi **Approximate size of the holding as at the date of the vote:** 1.1% **Date of vote:** 30/04	Elect Barbara Lavernos	Abstain	Yes	Board composition: there is no cyber/IT experience on the board, which we believe would strengthen oversight. Although the board should look to introduce an experienced director, the board have partially addressed our concerns by implementing director training sessions to support effective oversight. Director is up for an election and a member of the E&S Board	The resolution passed Following EdenTree's vote, engagement continued with a focus on cyber and AI governance and product safety in 2026. Sanofi emphasised that it has not faced any significant new product safety issues over the past year and highlighted positive progress in resolving legacy product safety litigation. EdenTree also discussed the company's established internal governance structures for both cyber oversight and AI use, including Board-level training, executive reporting and employee awareness measures and they were pleased to hear that there have been no cybersecurity controversies in recent periods.
Company name: Allianz SE **Approximate size of the holding as at the date of the vote:** 1.5% **Date of vote:** 08/05	Remuneration Report	Against	No	Remuneration, poor practice: structure allows for excessive pay opportunity. The CEO's maximum opportunity is 1125% of base which is excessively high. In addition, the company has failed to disclose the benchmark they have used to help determine their pay levels and the LTIP vests on one sole performance metric. Structurally, EdenTree finds this remuneration report very challenging	The resolution passed

Company name: Federal Signal Corp **Approximate size of the holding as at the date of the vote:** 1.1% **Date of vote:** 22/04	Ratification of Auditor	Against	No	Climate escalation: in addition to the company's poor progress against our engagement objectives, their reporting on non-financial matters is insufficient and prevents stakeholders from effectively assessing the company's performance in managing material risks	The resolution passed
	Advisory Vote on Executive Compensation	Against	No	Remuneration, poor practice: short vesting period. Remuneration, poor practice: structure allows for excessive termination benefits. Remuneration, poor practice: structure allows for excessive pay opportunity	The resolution passed
	Elect Brenda L. Reichelderfer	Against	No	Board independence: director long tenure may affect independence. Board independence: non-independent sub-committee chairs, may compromise alignment with shareholder interests	The resolution passed
Company name: SSE Plc **Approximate size of the holding as at the date of the vote:** 1.3% **Date of vote:** 17/07	Approval of Net Zero Transition Report and Adoption of Triennial Vote on Net Zero Transition Report	For	N/a	Climate change: SSE's net zero transition plan is thorough and transparent, with reasonable progress made over the period Overall, the net zero transition plan clearly outlines how the Company intends to meet its climate objectives, as well as the challenges they expect to face. Shareholder experience: Although EdenTree support this resolution, they do not believe it is best practice to combine the net zero transition report and the adoption of triennial vote into one proposal, which prevents shareholders from expressing their views on each individual request	The resolution passed. No significant next steps to report. EdenTree expect to engage with SSE again over 2026 given they are one of the companies in EdenTree's climate stewardship plan
Company name: Lloyds Banking Group **Approximate size of the holding as at the date of the vote:** 1.7% **Date of vote:** 15/05	Remuneration Report	Against	Yes	Remuneration, performance measurement: excessive non-financial targets within STI. Remuneration, poor practice: roll back of incentive-linked targets. Regarding the climate target, travel was a key driver of the increase in operational emissions last year. Although the manager appreciates the need to focus efforts, excluding international travel absolves a level of accountability in addressing the wider issue. Regarding the diversity target, Lloyds state that "we can only become the best bank for customers if our workforce reflects the diversity of the UK population." We believe scaling back the diversity target to focus solely on executive diversity does not align with this belief	The resolution passed

Company name: Veolia Environment SA **Approximate size of the holding as at the date of the vote:** 1.3% **Date of vote:** 24/04	2024 Remuneration of Antoine Frérot, Chair	Against	Yes	Remuneration, poor practice: escalation vote due to concerns around continued poor pay practices. EdenTree has significant concerns regarding the misalignment between pay and deteriorating H&S performance	The resolution passed
	2024 Remuneration of Estelle Brachlianoff, CEO	Against	Yes	Remuneration, poor, practice: EdenTree has significant concerns regarding the decision to increase the H&S achievement rate between 2023 (70%) and 2024 (100%), in light of increased fatalities over the same period. Furthermore, they question how the remuneration committee have determined maximum payout under the H&S metric despite recording 13 fatalities in 2024. Remuneration, poor practice: STI opportunity outweighs LTI. Remuneration, poor practice: insufficient, or no, clawback policy in place. Remuneration, performance measurement: excessive non-financial targets within STI	The resolutions passed. No significant next steps to report. EdenTree expect to engage with Veolia again over 2026 given they are one of the companies in EdenTree's climate stewardship plan
	2024 Remuneration Report	Against	Yes		
	Elect Elena Salgado Méndez	Against	Yes	Remuneration, poor practice: in light of EdenTree's concerns around continued poor pay practices, and as the chair of the remuneration committee is not up for election, they are escalating their action by voting against the other directors serving on the Remuneration Committee	
	Elect Pierre-André de Chalendar	Against	Yes	Board independence: chair is not considered independent. Board independence: remuneration committee should be fully comprised of independent directors, EdenTree holds the nomination committee chair responsible for this. Remuneration, poor practice: In light of EdenTree's concerns around continued poor pay practices, and as the chair of the remuneration committee is not up for election, they are escalating their action by voting against the other directors serving on the Remuneration Committee	
Company name: HSBC Holdings Plc **Approximate size of the holding as at the date of the vote:** 1.6% **Date of vote:** 02/05	Elect Geraldine Buckingham	For	n/a	Director Chairs the E&S Committee, we note the bank has pushed back its net zero target to 2050, a reflection of slow progress in scope 3 emissions. In addition we note the removal of the role of CSO from the executive committee. We do not support any ambition on decarbonisation being watered down and will monitor whether HSBC will amend any of its financed emission targets or indeed its transition plan. If these elements are weakened will consider taking firm action against Board directors accountable for oversight of climate risk	The resolution passed. EdenTree continues to engage with HSBC on climate ambition and fossil fuel financing as members of the ShareAction collaborative engagement. In 2025, EdenTree joined an investor statement calling on HSBC to reaffirm its commitment to building on climate targets and policies aligned with its ambition to become a net zero bank by 2050, and to meet with investors to discuss its internal review of climate targets and policies. EdenTree also participated in the first collaborative investor call with the bank, which provided a useful foundation for dialogue but left investors

					seeking greater clarity on interim decarbonization targets and fossil fuel financing policy. They will continue to use collaborative engagement and voting to encourage HSBC to maintain credible near-term climate ambition and robust fossil fuel financing standards

1 As a % of EdenTree equity portfolio (including infrastructure holdings).

Insight LDI

Due to the characteristics of the fixed income funds, voting information is not available and was not produced by Insight.