

The Assay Office Retirement Benefits Scheme – Implementation Statement for the year ended 31 March 2026

1. Purpose

This Implementation Statement reports on how, and the extent to which, the policies as set out in the Scheme’s Statement of Investment Principles (“SIP”) have been complied with during the year ended 31 March 2026. This has been reviewed with respect to voting and stewardship policies, conflicts of interest and engagement. These include the exercise of rights (including voting) and undertaking of engagement activities in respect of the Scheme’s investments. In addition, this statement also provides a summary of the voting behaviour and most significant votes cast during the reporting year.

2. Background

This Statement has been prepared by the Trustee with the assistance of their Investment Advisers (Quantum Advisory), in line with the current regulatory guidance that was in place at the Scheme year end.

References herein to the actions, review work or determinations of the Trustee refer to activity that has been carried out by either the Trustee, or the Investment Adviser on the Trustee’s behalf.

3. Executive summary

Over the Scheme year, the Trustee:

- Reviewed the investment strategy for the Scheme. The funds covered in this statement were those in place at the Scheme year end. The agreed new strategy and funds for the Scheme will be reported on in next year’s statement.
- Reviewed the voting and engagement activity of the funds that invest in equities. The Trustee is generally content that the Scheme’s investment managers have appropriately carried out their stewardship duties.
- Is of the opinion that it has complied with the relevant policies and procedures as identified in the SIP.
- Has remained aware of the relevant policies and procedures as identified in the SIP and received input from their Investment Adviser to aid ongoing compliance.

The voting activities for funds that do not hold equities have not been reviewed as part of this exercise, as the Trustee believes there is less scope to influence the practices within such arrangements. However, the general stewardship practices of non-equity managers have been reviewed to ensure that they engage with companies, especially with those to which it lends. This ensures that the voice of the bond holder is reflected in conversations.

4. Investment Manager's voting and stewardship policies and activity

Trustee's voting and stewardship policies

The Trustee, through their investment advisers, consider how stewardship factors are integrated into the investment processes when: (i) appointing new investment managers; and (ii) monitoring existing investment managers.

The Trustee is unable to direct how votes are exercised and have not used a proxy voting services provider over the year. The Trustee has given the investment managers full discretion concerning voting and engagement decisions. As part of this exercise, the Trustee, with the assistance of their Investment Adviser, has reviewed the voting activities and stewardship policies of the funds.

Whilst the Trustee feels that all ESG matters are important, it decided to focus its stewardship efforts on managing risks associated with Climate Change, as it recognises that a rise in global temperatures could have an adverse effect on the Schemes' investments, and Board Accountability & Composition, as it recognises that a good level of diversity in company boards can help improve long-term returns for investors. Furthermore, the Trustee recognises that investment managers commonly provide voting information on these two areas, which will allow the Trustee to assess whether their voting activity aligns with the Trustee's priorities. The Trustee will monitor and discuss instances where the investment managers' voting activity does not align with its priorities and seek to understand the reasons for this in the first instance. The Trustee will then escalate the matter if it persists and may review their holding in the fund if this is deemed appropriate.

Over the Scheme year, the voting activities and general stewardship policies of the following funds have been reviewed by Quantum Advisory on behalf of the Trustee:

- Legal & General Asset Management ("L&G") World Equity Index ("WEIF")
- L&G Dynamic Diversified ("DDF")

Furthermore, the general stewardship policies of the funds listed below have also been reviewed:

- M&G Total Return Credit Investment
- L&G Matching Core Fixed Long
- L&G Matching Core Fixed Short
- L&G Matching Core Real Long
- L&G Matching Core Real Short
- L&G Maturing Buy & Maintain Credit 2025-2029
- L&G Sterling Liquidity

Managers' voting and stewardship policies and procedures

Details of the managers' voting and stewardship policies can be found in Appendix 1. In this Statement, the investment managers' stewardship policies and the extent to which the investment managers make use of any proxy advisory and voting services have been noted. Quantum Advisory are satisfied that the voting and policies/procedures of the investment managers are reasonable and consistent with industry practice. Quantum Advisory are also satisfied that the general stewardship policies of all the investment managers are reasonable and consistent with industry practice. This includes investments in bonds and other instruments. The Trustee has approved of these conclusions.

Voting statistics

The table below sets out the key statistics on voting eligibility and action over the year.

| Statistic | L&G WEIF | L&G DDF |
|---|----------|---------|
| Number of equity holdings | 2,790 | 7,234 |
| Meetings eligible to vote at | 2,842 | 10,539 |
| Resolutions eligible to vote on | 35,913 | 107,354 |
| Proportion of eligible resolutions voted on (%) | 99.98 | 99.91 |
| Votes with management (%) | 80.31 | 75.49 |
| Votes against management (%) | 19.44 | 23.71 |
| Votes abstained from (%) | 0.25 | 0.80 |
| Meetings where at least one vote was against management (%) | 69.69 | 68.79 |
| Votes contrary to the recommendation of the proxy adviser (%) | 15.07 | 13.69 |

Source: L&G.

The Trustee is generally satisfied with the level of voting activity that has been undertaken.

Significant votes over the reporting year

The Trustee has interpreted the most significant votes to mean their choice of votes from an extended list of significant votes provided by the investment manager in accordance with the Pensions UK guidance.

The significant votes provided by the investment manager are determined by the stewardship policies they have in place. The Trustee has reviewed and is satisfied with the manager's classifications of significant votes during the Scheme year.

A cross section of the most significant votes cast is contained in Appendix 2.

5. Conflicts of interest

This section reviews whether the managers are affected by the following conflicts of interest, and how these are managed. These conflicts are not specific to the scheme and relate to the general conflicts of interest within the investment managers.

1. The asset management firm overall having an apparent client-relationship conflict e.g. the manager provides significant products or services to a company in which they also have an equity or bond holding;
2. Senior staff at the asset management firm holding roles (e.g. as a member of the Board) at a company in which the asset management firm has equity or bond holdings;
3. The asset management firm's stewardship staff having a personal relationship with relevant individuals (e.g. on the Board or the company secretariat) at a company in which the firm has an equity or bond holding;
4. A situation where the interests of different clients diverge. An example of this could be a takeover, where one set of clients is exposed to the target and another set is exposed to the acquirer; and
5. Differences between the stewardship policies of managers and their clients.

L&G

L&G have refrained from directly commenting on which of the conflicts of interest, detailed above, they are impacted by within the selected funds. Instead, L&G referred the Trustee to their conflicts of interest policy, which includes several examples of conflicts and how these might be managed.

This is available here:

<https://group.legalandgeneral.com/asset/49331d/globalassets/group/reporting-hub/policies/2025/group-conflicts-of-interest-policy-2025.pdf>

M&G

M&G stated that they are not affected by the five conflicts notes above. They use all reasonable endeavours to identify conflicts of interest and then take steps to either avoid or manage them effectively to treat clients fairly.

If the arrangements made by M&G to identify, prevent or manage a conflict of interest are not sufficient to ensure, with reasonable confidence, that risks of damage to a client's interests will be prevented, M&G will make an appropriate disclosure (in accordance with regulatory requirements) to the relevant client before undertaking any further activity. Where it is not possible to satisfactorily manage a conflict (including where disclosure is not a sufficient option) M&G will decline to act for the client concerned.

M&G have published their conflicts of interest policy here:

<https://www.mandg.com/dam/investments/common/shared/en/documents/m-g-luxembourg-policies/conflicts-of-interest-disclosure-statement.pdf>

Appendix 1 – Investment manager voting policies and procedures

L&G

L&G have a proven track-record of being active owners; striving to use their scale to ensure that the companies in which they invest are acting responsibly and markets / regulators create an environment in which good management of ESG factors are valued and supported. Although L&G tend to focus on equity stewardship, L&G also extends its ESG analysis and engagement policies to its active fixed income investments. L&G aims to incorporate ESG considerations to assess ESG risks from a financial perspective and L&G also engages with issuer companies through its global engagement groups. Please note, however, this approach does not extend to the Scheme's UK Government Bond holdings as these are invested passively. Quantum believes this is reasonable given their underlying investments. For Equity holdings, L&G's Investment Stewardship team make all voting decisions, in accordance with L&G's Corporate Governance & Responsible Investment and Conflicts of Interest policy documents, which are reviewed annually. Each member of the team is allocated a specific sector globally so that the voting is undertaken by the same individuals who engage with the relevant company.

L&G's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by L&G and strategic decisions are not outsourced. The use of ISS recommendations is purely to augment L&G's own research and proprietary ESG assessment tools. The Investment Stewardship team also uses the research reports of IVIS to supplement the research reports that are received from ISS for UK companies when making specific voting decisions.

To ensure the 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. These instructions apply to all markets globally and seek to uphold what L&G consider are minimum best practice standards which L&G believe all companies globally should observe, irrespective of local regulation or practice. L&G retain the ability in all markets to override any voting decisions, which are based on their custom voting policy. This may happen where engagement with a specific company has provided additional information that allows L&G to apply a qualitative overlay to their voting judgement. L&G have strict monitoring controls to ensure their votes are fully and effectively executed in accordance with their voting policies by their service provider. This includes a regular manual check of the votes input into the platform, and an electronic alert service to inform them of rejected votes which require further action.

M&G

M&G's voting approach is grounded in acting in clients' best interests, with voting decisions informed by a broad range of factors. While M&G do not routinely consult clients ahead of votes, it will take client views into account where these are known. Voting is treated as an integral part of investment activity, with each proposal assessed on its merits. M&G considers relevant issues, engages with company management when appropriate, and votes in a way that seeks to protect and enhance long-term shareholder value.

Proxy research from ISS and the Investment Association is used to support analysis, and voting activity is executed through ISS's ProxyExchange platform. These inputs inform, but

do not determine, final voting decisions. In line with the Shareholder Rights Directive II, M&G has developed its own definition of significant votes, shaped by internal discussion and external guidance, and this definition is reviewed periodically.

No significant votes breached client voting policies during the reporting period, and M&G reports no conflicts of interest across the typical categories associated with stewardship and voting, including commercial relationships, staff roles, personal relationships, diverging client interests, or policy misalignment.

M&G publishes its full voting policy and detailed voting records on its website, and reviews the policy regularly to ensure it remains current and effective.

Appendix 2 – Most significant votes

The tables below set out a cross section of significant votes undertaken by L&G for the funds held by the Scheme. Information on further significant votes has been reviewed by the Trustee.

L&G’s significant vote definitions

In determining significant votes, L&G’s Investment Stewardship team considers the criteria provided by the Pensions UK guidance. This includes but is not limited to:

- High profile vote which has such a degree of controversy that there is high client and / or public scrutiny;
- Significant client interest for a vote: directly communicated by clients to the Investment Stewardship team at L&G’s annual Stakeholder roundtable event, or where we note a significant increase in requests from clients on a particular vote;
- Sanction vote as a result of a direct or collaborative engagement;
- Vote linked to an L&G engagement campaign, in line with L&G Investment Stewardship’s 5-year ESG priority engagement themes.

L&G WEIF

| Company Name | Microsoft Corporation | Deere & Company |
|--|---|---|
| Date of Vote | December 2025 | February 2026 |
| Stewardship priority | Board Accountability & Composition | Climate change |
| Summary of the resolution | Elect Director Satya Nadella | Report on Expected Return on Investment of Company’s Emissions Reduction Goals |
| Size of the holding (% of portfolio) | 4.1 | 0.3 |
| How the firm voted | Against | Against |
| Was the vote against management and was this communicated beforehand? | The vote was against management, but the vote intention was not communicated beforehand. | The vote was in favour of the management’s recommendation (and against the shareholder resolution), and the vote intention was pre-declared. |
| On which criteria has the vote been deemed as ‘significant’? | L&G considers this vote to be significant as it is in application of an escalation of their vote policy on the topic of the combination of the board chair and CEO, | This shareholder resolution is considered significant due to its focus on climate-related disclosure and its implications for long-term value creation. While L&G support |

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|---|--|--|
| | which they believe should be two separate roles. | transparent, value-linked climate reporting and have been actively engaging Deere on enhanced disclosures, particularly on Scope 3 and customer outcomes, they do not believe this prescriptive proposal would meaningfully improve investor understanding and therefore voted against the proposal. |
| Outcome of the vote | The vote passed | Not disclosed |
| Do the trustees/ asset manager intend to escalate stewardship efforts? | L&G will continue to engage with investee companies, publicly advocate their position on this issue and monitor company and market-level progress. | L&G will continue to engage with investee companies, publicly advocate their position on this issue and monitor company and market-level progress. |

Source: L&G.

L&G DDF

| Company Name | OVH Groupe SAS | SK hynix, Inc. |
|--|--|---|
| Date of Vote | February 2026 | March 2026 |
| Stewardship priority | Climate change | Board Accountability & Composition |
| Summary of the resolution | Approve Company's Climate Transition Plan (Advisory) | Elect Ko Seung-beom as Outside Director to Serve as an Audit Committee Member |
| Size of the holding (% of portfolio) | <0.01 | 1.4 |
| How the firm voted | Against | For |
| Was the vote against management and was this communicated beforehand? | The vote was against management, but the vote intention was not communicated beforehand. | The vote was in favour of the management's recommendation, and the vote intention was pre-declared. |

| | | |
|--|---|--|
| <p>On which criteria has the vote been deemed as 'significant'?</p> | <p>L&G is publicly supportive of "Say on Climate" votes. They expect transition plans put forward by companies to be both ambitious and credibly aligned to a 1.5C scenario. Given the high-profile nature of such votes, L&G deem such votes to be significant, particularly when L&G votes against the transition plan.</p> | <p>This resolution is considered significant due to director elections taking place during the first proxy season following reforms to the Korean Commercial Act, which enhanced expectations around board and audit committee independence and oversight.</p> |
| <p>Outcome of the vote</p> | <p>Not disclosed</p> | <p>Not disclosed</p> |
| <p>Do the trustees/ asset manager intend to escalate stewardship efforts?</p> | <p>L&G will continue to engage with investee companies, publicly advocate their position on this issue and monitor company and market-level progress.</p> | <p>L&G will continue to engage with investee companies, publicly advocate their position on this issue and monitor company and market-level progress.</p> |

Source: L&G.