Beaverbrooks the Jewellers Limited Staff Pension and Life Assurance Plan ('Plan')

31 March 2026 Implementation Statement

1. Introduction

The Trustee is required to make publicly available online a statement ("the Implementation Statement") covering the Beaverbrooks the Jewellers Limited Staff Pension and Life Assurance Plan (the 'Plan') in relation to the Plan's Statement of Investment Principles (the "SIP").

The SIP was amended during the year ending 31 March 2026, and the changes made were predominantly to account for changes to the investment strategy and strategic asset allocation.

This SIP came into force from February 2026.

A copy of the current SIP dated February 2026 can be found here: https://www.dalriadatrustees.co.uk/wp-content/uploads/2026/08/20260219-Beaverbrooks-SIP.pdf?gclid=EAIaIQobChMIjLXTmer7kAMV_5ZQBh2juhxKEAAYASAAEgL98PD_BwE

This Implementation Statement covers the period over the year to 31 March 2026 (the "Plan Year"). It sets out:

– How the Trustee's policies on stewardship have been followed over the Plan Year; and

– The voting by or on behalf of the Trustee during the Plan Year, including the most significant votes cast and any use of a proxy voter during the Plan Year

The latest guidance ("the **Guidance**") from the Department for Work and Pensions ('**DWP**') aims to encourage the Trustee of the Plan to properly exercise its stewardship policy including both voting and engagement which is documented in the Plan's SIP. With the help of the Plan's Fiduciary Manager, to whom the Trustee delegated the implementation of its Stewardship policy, this Implementation Statement has been prepared to provide the details on how the Trustee has complied with the DWP's statutory guidance.

The Trustee uses the Fiduciary Management service of Schroders IM Limited as its Investment Manager and Adviser (referred to as the '**Fiduciary Manager**' in the Implementation Statement). The Fiduciary Manager can appoint other investment managers (referred to as '**Underlying Investment Managers**') to manage part of the Plan's assets, and investments with these managers are generally made via pooled funds, where the Plan's investments are pooled with those of other investors.

A copy of this Implementation Statement is available on the following website: https://www.dalriadatrustees.co.uk/scheme/beaverbrooks-the-jewellers-limited-staff-pension-and-life-assurance-plan/?type=documents&gclid=EAIaIQobChMIjLXTmer7kAMV_5ZQBh2juhxKEAAYASAAEgL98PD_BwE

2. How the Trustee's policies on stewardship have been followed over the Plan Year

The Trustee remains responsible for its stewardship policy and for this Implementation Statement. As described in the SIP, the Trustee has delegated day-to-day voting and engagement activity to the Fiduciary Manager but monitors how those responsibilities are carried out through regular reporting, review and challenge to ensure they are aligned with the Trustee's priorities and objectives. A copy of the Scheme's SIP has been provided to the Fiduciary Manager, who is expected to follow the Trustee's investment (including stewardship) policies when providing Fiduciary Management services.

This Statement explains how the Trustee's stewardship policy has been followed during the Scheme Year, having regard to the DWP's statutory guidance.

The Fiduciary Manager aligns its own stewardship activities with Schroders' Engagement Blueprint, which identifies six broad themes for their active ownership: Climate Change, Natural Capital & Biodiversity, Human Rights, Corporate Governance, Human Capital Management, and Diversity & Inclusion. From these, the Fiduciary Manager has chosen Climate Change, Natural Capital & Biodiversity, and Human Rights as its focus for the stewardship actions it performs on behalf of the Scheme. The Trustee expects that the Fiduciary Manager's stewardship activities will result in better management of ESG and climate related risks and opportunities, which is expected to improve the long-term financial outcomes of the Scheme. Therefore, the Trustee has aligned its stewardship priorities with the Fiduciary Manager's.

The Fiduciary Manager is a signatory to the UK Stewardship Code which sets high standards for those investing money on behalf of UK pensioners and savers. The UK Stewardship Code describes stewardship as "the responsible allocation, management and oversight of capital to create long-term value … leading to sustainable benefits for the economy, the environment and society." Thus, the Fiduciary Manager's stewardship activities on behalf of the Trustee encompass a variety of tools, including portfolio ESG integration, manager research and selection, portfolio ESG metric monitoring and voting and engagement.

As part of ongoing monitoring of how the Fiduciary Manager (FM) has exercised the Trustee's stewardship policy, the Trustee reviewed quarterly FM ESG updates and the FM Annual ESG Report during the Scheme Year. The quarterly ESG updates allow the Trustee to monitor the ESG characteristics of the Scheme's portfolio and thereby assess the Fiduciary Manager's allocation, management and oversight of the Scheme's capital. In addition, the quarterly report also details stewardship activities including both voting and engagement the Fiduciary Manager and Underlying Investment Managers carried out on behalf of the Trustee. The FM Annual ESG Report details various areas concerning the Fiduciary Manager's ESG integration within the investments and stewardship activities over the previous calendar year. The Trustee challenged and discussed stewardship outcomes with the Fiduciary Manager during the year and considered whether the Fiduciary Manager and Underlying Investment Managers were demonstrating effective use of voting rights and engagement. Following this review, the Trustee believes that the stewardship approach adopted by the Fiduciary Manager and Underlying Investment Managers remains consistent with the policies set out in the SIP.

Examples of how this has been evidenced include:

- The Fiduciary Manager continues to integrate ESG and climate factors via the incorporation of MSCI and SustainEx scores, and other data on sustainability metrics, as well as applying exclusions to its internally managed equity fund (the Schroders Life Global Diversified Equity Fund) during the security selection process. The exclusions consist of both Schroders Group criteria including UNGC Global Norms Violators, controversial weapons and thermal coal as well as additional exclusions such as Tobacco and Gambling, such that this internally managed equity fund has greater sustainability characteristics. This ensures a closer alignment of the Plan's investments with the Trustee's stewardship priorities, as these excluded investments are generally viewed as causing significant harm to the environment and society.
- The Fiduciary Manager is also developing its investment process to integrate biodiversity and nature considerations, via its proprietary nature tool "NatCapEx". The NatCapEx metric has been introduced into the Fiduciary Manager's quarterly reporting for monitoring purposes, in addition to being leveraged as an engagement tool and to provide a greater understanding of exposure to nature related risks.
- ESG integration and engagement, including engagements with counterparties where relevant, was carried out in the Plan's Growth and LDI portfolios.

- Enhanced monitoring of climate laggards, biodiversity scores and UNGC violator exposures of core strategies within the portfolio for potential future engagements.
- There were a number of strategies which integrate ESG factors, including stewardship and engagement, included in the Growth portfolio over the year.
- Through dedicated engagements over the year, the Fiduciary Manager worked with one of the active credit managers in the Growth portfolio to implement a net zero target at the strategy level to enhance their mandate to have a specific climate transition focus.
- Annual assessment of Underlying Investment Managers' ESG ratings against a comprehensive internal ESG assessment framework. Lower-rated managers are categorised as either Red-Engagement or Red-Exclusion, requiring further engagement to improve their rating, or exclusion on the grounds of poor ESG credentials. The ESG ratings were also used to identify the areas of engagement with Underlying Investment Managers across the engagement priorities.
- Regular investment and operational due diligence on the Underlying Investment Managers to monitor voting and engagement policies concerning the Plan's investments.
- Provision of quarterly voting and engagement examples to the Trustee, facilitating a more regular review throughout the year of the Fiduciary Manager and Underlying Investment Managers' stewardship activities. In addition, the quarterly ESG reporting also includes "spotlight" pages to provide Trustee with ESG related hot topics and educational material such as ESG integration for particular asset classes.

Considering the voting statistics and behaviour set out in this Implementation Statement, along with the engagement activity that took place on the Trustee's behalf during the Plan Year within the growth and LDI portfolios, the Trustee is pleased to report that the Fiduciary Manager and the Underlying Investment Managers have demonstrated high levels of voting and engagement in line with its stewardship policy.

Specifically, the Trustee noted that:

- Each manager demonstrated high levels of voting rights being acted on, where voting is relevant.
- Where the holdings did not have voting rights attached, the Underlying Investment Managers showed they carried out a good level of engagement activity with the underlying companies over the Plan Year.
- Challenge to management was demonstrated through votes by the Underlying Investment Managers against management.
- The Fiduciary Manager has carried out a high level of engagement activities with the Underlying Investment Managers, focussing on laggards and material allocations across three different engagement priorities.
- The Fiduciary Manager has also carried out a high level of engagement with different governing bodies for the Liability Hedging mandate to ensure that the Plan's liability hedging programme remains robust following the events of the Gilt Crisis of Autumn 2022. Moreover, the Fiduciary Manager provided inputs to those governing bodies to ensure they continue to deliver even better outcomes for their clients, including the Plan.

Given the activities carried out during the Plan Year and by preparing this Implementation Statement, the Trustee believes that it has acted in accordance with the DWP Guidance over the Plan Year.

3. Voting During the Plan Year

The Trustee has delegated responsibility for voting on its behalf to the Fiduciary Manager and Underlying Investment Managers. Most voting rights associated with the Plan's investments pertain to the underlying securities within the pooled funds managed by the Underlying Investment Managers. In a general meeting of a company issuing these securities, the Underlying Investment Managers exercise their voting rights according to their own policies, which the Fiduciary Manager may have influenced.

The pooled funds themselves often confer certain rights around voting or policies. These rights are exercised by the Fiduciary Manager on behalf of the Trustee, in line with the Trustee's stewardship policy.

Voting by the Fiduciary Manager

The Plan's investments in the growth portfolio are typically made via pooled funds and the Fiduciary Manager exercises the votes in relation to the management of those pooled funds. The voting statistics are shown below.

Over the year to 31 March 2026, regarding clients' pooled fund investments[1], the Fiduciary Manager voted on 181 resolutions across 23 meetings. The Fiduciary Manager voted against management on 73 resolutions (40.3% of total resolutions) and abstained on 59 resolutions (32.6% of the total resolutions). The voting topics covered a range of areas, including executive board composition, investment management processes, fund documentation, auditor tenure and fund costs. The number of resolutions that the Fiduciary Manager has voted on during the year has increased due to an increase in the number of funds in the Growth portfolio.

The Fiduciary Manager, via the Schroders Active Ownership team, also votes on behalf of the Trustee's in relation to the underlying securities where voting rights are attached. These voting statistics are relevant to the securities within the **Schroders Life Global Diversified Equity Fund** and are shown in the summary voting statistics section.

Voting by the Underlying Investment Managers

Most Significant Votes

The following criteria must be met for a vote to be considered 'significant':

1. Must relate to the **Schroders Life Global Diversified Equity Fund**
2. Must be defined as significant by the Fiduciary Manager; and
3. Must relate to the Trustee's stewardship priority themes

The **Schroders Life Global Diversified Equity Fund** constitutes a significant proportion of the Plan's Growth Asset portfolio and thus constitutes the majority of the Plan's investments in equity assets – with equity being the main asset class that holds voting rights. Additionally, within the Plan's Growth Asset portfolio, this is the only fund for which the Fiduciary Manager has responsibility over security selection. For these reasons, the voting activity associated with the securities in this fund holds particular significance for the Plan.

Schroders Active Ownership team exercises the voting rights, in line with the Schroder's Global Voting Guides (shown in the appendix), which is guided by the Schroders' **Engagement Blueprint**. The Fiduciary Manager believes that all resolutions voted against the board's recommendations should be classified as a significant vote. Generally, the Fiduciary Manager does not communicate their voting intentions to companies regarding shareholder resolutions. Regarding next steps after a vote, in the instance that votes are successful, the Schroders team will typically monitor progress closely. If the votes are unsuccessful, Schroders will typically look to engage with the companies before the next AGM takes place.

Of the votes that satisfy the above criteria, the Trustee has selected one vote relating to each of the priority themes that it deems most material to the long-term value of the investments. These votes are hereby defined as 'most significant votes', and as per DWP guidance, the Trustee has communicated this definition of 'most significant votes' to the Fiduciary Manager. All of the most significant votes over this Plan Year have been reported below.

[1]The voting statistics provided pertain to the Fiduciary Manager's Model Growth portfolio which we believe are a suitable proxy for the pooled fund investments held by the Plan.

CLIMATE CHANGE – At Meta Platforms Inc.'s AGM on 29 May 2025, Schroders supported a shareholder proposal calling for alignment of lobbying activities with the company's net zero emissions commitment by 2030. This vote, cast against management, reflected Schroders's belief that shareholders benefit from understanding how lobbying supports long-term climate goals. The proposal was not approved, consistent with other ESG proposals at Meta that have gained significant independent shareholder backing but failed due to the company's dual-class share structure, which grants Mark Zuckerberg majority voting control.

NATURAL CAPITAL AND BIODIVERSITY - At Amazon.com Inc.'s AGM on 21 May 2025, Schroders voted for a proposal requesting disclosure on the company's use of unrecyclable flexible plastic packaging, a material widely criticized for its environmental impact, especially on marine ecosystems. Amazon is believed to be one of the largest users of flexible plastic packaging globally, yet it does not disclose the tonnage used. Schroders viewed expanded reporting as beneficial for transparency and reducing environmental risks, particularly to marine ecosystems. Management opposed the proposal, arguing existing reporting was sufficient. While the resolution did not pass, Schroders noted Amazon has reported reduced plastic packaging by more than 25% in 2024.

HUMAN RIGHTS – At Johnson and Johnson's AGM on 24 May 2025, Schroders supported a shareholder resolution led by Mercy Investment Services, a socially responsible investor, calling for a human rights impact assessment (HRIA) on operations related to access to medicines. Although J&J has due diligence processes in place, concerns were raised that its lobbying activities may undermine commitments on access. Schroders supported the proposal, which is aligned to international human rights standards, believing it would improve transparency, reduce reputational and regulatory risks, and protect long-term shareholder value. Unfortunately, the resolution was not passed.

Summary Voting Statistics

Only the Plan's equity holdings invest in assets with voting rights attached. Below are the voting statistics over the year to 31 March 2026 for the most material funds held on behalf of the Trustee that had voting rights during the period.

Some of the Plan's equity holdings are invested via Exchange Traded Funds (ETFs) where voting is also relevant. However, given the Trustee has little influence on the ETF providers' voting and engagement approach, the Trustee has elected to not include the voting statistics of the ETFs in this Implementation Statement. Instead, the ETF providers' voting and engagement policies are included in the Appendix. Finally, the proxy voting services used are Glass Lewis ("GL") and Institutional Shareholder Services ("ISS")

Equity Funds	Schroders Life Global Diversified Equity Fund	Artisan Global Value Fund	GMO Quality Investment Fund	JPM Europe Dynamic (ex-UK) Fund	Morant Wright Fuji Yield Japanese Fund	NinetyOne Natural Resources Fund	Robeco Emerging Market Active Equities
Total meetings eligible to vote	388	37	46	72	58	65	701
Total resolutions eligible to vote	5,348	699	745	1,383	696	882	6,188
Of resolutions eligible to vote, % of resolutions voted on	96%	100%	100%	93%	100%	100%	100%
Of voted resolutions, % vote with management	87%	96%	95%	95%	89%	97%	82%
Of voted resolutions, % vote against management	13%	4%	5%	4%	11%	3%	15%
Of voted resolutions, % abstained	<1%	0%	0%	<1%	0%	<1%	3%
Of voted resolutions, % vote contrary to the recommendation of proxy adviser (if applicable)	10%	9%	7%	2%	N/A	3%	8%
Proxy voting service used	GL & ISS	ISS & GL	ISS	ISS	N/A	ISS	GL

Note:

– Managers also use their proxy voting service providers for research purposes and typically work with them to create bespoke voting guidelines, usually complemented with analysis of their in-house ESG specialists and where appropriate with reference to financial analysts and portfolio managers.

– Figures may not total 100% due to a variety of reasons, such as lack of management recommendation, scenarios where an agenda has been split voted, multiple ballots for the same meeting were voted different ways, or a vote of 'Abstain' is also considered a vote against management.

– Four new active equity funds, **Artisan Global Value Fund, GMO Quality Investment Fund, JPM Europe Dynamic (ex-UK) Fund and Robeco Emerging Markets Active Equities Fund**, and one new commodity fund where voting is relevant, **NinetyOne Natural Resources Fund,** were introduced to the Growth portfolio over the Plan Year, although the voting data is for the year to 31 March 2026, sourced from the investment managers per Pension and Life Savings Association ("PLSA") guidance.

– Morant Wright do not subscribe to any shareholder advisory services, and their portfolio managers are directly responsible for proxy voting decisions.

– Robeco do not provide the voting data in line with PLSA guidance and therefore we have manipulated the data for consistency across managers.

The Trustee is satisfied that the voting and engagement activities undertaken by both the Fiduciary Manager and the Underlying Investment Managers align with the stewardship priorities determined during the Plan Year, hence the Trustee believes that it has satisfactorily implemented the Stewardship Policy stated in the Plan's SIP.

Appendix 1 – ESG, Voting and Engagement Policies

Links to the ESG, voting and/or engagement policies (where applicable) for both the Fiduciary Manager and Underlying Investment Managers of the Plan's holdings can be found here:

Investment Manager	Voting & Engagement Policy
Amundi	Amundi Global Voting Policy 2025 Amundi 2024 Engagement Report
Artisan	https://www.artisanpartners.com/content/dam/documents/legal/proxy-voting/Proxy-Voting-Policy.pdf Sustainability/ESG | Artisan Partners Asset Management Inc
BlackRock (including iShares ETFs)	https://www.blackrock.com/corporate/literature/publication/blackrock-active-investment-stewardship-engagement-and-voting-guidelines.pdf
DWS Group (Xtrackers ETFs)	https://www.dws.com/AssetDownload/Index?assetGuid=4f6b86d3-a8a8-42a0-b10c-a87585398cb7&consumer=E-Library https://download.dws.com/download?elib-assetguid=e609c46cc03148eead59178e865d9fed
GMO	https://www.gmo.com/globalassets/documents---manually-loaded/documents/legal/proxy-voting---gmo.pdf https://www.gmo.com/globalassets/documents---manually-loaded/documents/esg-investing/gmo-engagement-policy.pdf
JP Morgan	https://am.jpmorgan.com/content/dam/jpm-am-aem/global/en/institutional/communications/lux-communication/corporate-governance-principles-and-voting-guidelines.pdf Engagement-and-proxy-voting-statement.pdf
Man Group	Responsible investment | Man Group
Morant Wright	Voting-Policy.pdf
Neuberger Berman	https://www.nb.com/handlers/documents.ashx?id=aba155d6-e78e-4668-800f-fa69f05d45d0&name=Stewardship%20and%20Engagement%20Policy
NinetyOne	91-stewardship-policy-and-proxy-voting-guidelines-en.pdf
Oaktree	https://www.oaktreecapital.com/docs/default-source/default-document-library/esg-policy-2024.pdf
PIMCO	23d2d320682248b30f04e020abb291073152f182fac4a179482bbb994a349c61a01871832e020d7e98ffe91f9bad9a7965b4e51591ab43030b3ad2bf6a7f1dd6
Robeco	docu-robeco-stewardship-policy.pdf
Schroders Solutions	https://mybrand.schroders.com/m/6197143c263420f5/original/Schroders-Group-Sustainable-Investment-Policy.pdf https://mybrand.schroders.com/m/75fa1cd8dd188c3b/original/613798_SC_Listed-Assets-Blueprint-Report-_Digital_16_9_V12.pdf
SCOR	SCOR_IP_2025_Shareholder engagement policy_0.pdf

State Street	stewardship-report-2025.pdf
Vanguard (Vanguard ETFs)	Global Proxy Voting Policy Vanguard Investment Stewardship 2025 Annual Report