

One Ecolab Pension Plan

Annual Implementation Statement – Plan year ending 31 March 2025

Introduction

This document is the Annual Implementation Statement (“the statement”) prepared by the Trustee of the One Ecolab Pension Plan (“the Plan”) covering the Plan year to 31 March 2025.

The purpose of this statement is to:

- Detail any reviews of the Statement of Investment Principles (“SIP”) that the Trustee has undertaken, and any changes made to the SIP over the year as a result of the review.
- Set out the extent to which, in the opinion of the Trustee, the Plan’s SIP required under section 35 of the Pensions Act 1995 has been followed during the scheme year, including policies on engagement and voting.
- Describe the voting behaviour by, or on behalf of, the Trustee over the year.

The Plan makes use of a wide range of investments, therefore, the principles and policies in the SIP are intended to be applied in aggregate and proportionately, focussing on areas of maximum impact.

A copy of this implementation statement has been made available on the following website (www.legalandgeneral.com/ecolabchairstatement) and included in the Trustee’s annual report and accounts for the year to 31 March 2025.

Review of and changes to the SIP

The Statement of Investment Principles (SIP) was updated in September 2024. The updates include the Trustee’s approach to investment in illiquid assets in the DC Section, reflecting an allocation to illiquid assets through the strategy used by L&G within the Diversified Fund. Additionally, a new alternative lifestyle strategy (OEPP Lifestyle Strategy Targeting Drawdown) was introduced in the DC Section, which assumes members will use income drawdown to access their accounts at retirement. Finally, the updates reflect the outcome of an exercise to consolidate legacy AVC investments into the funds available in the DC Section of the Plan.

The SIP was also updated in November to reflect changes made to the DB Section. The changes included;

- Updating the target asset allocation for the Nalco, Pest, Chemicals and Purolite Sections.
- Updated wording to note that the Nalco, Chemical, and Pest Sections of the Plan had reached their target asset allocation following the result of the de-risking framework.
- Updated wording relating to the rebalancing process, reflecting the Trustee’s updated process
- Removal of reference to segregated mandates which are no longer relevant for the One Ecolab Pension Plan.

Range of funds updated following the strategy review

Adherence to the SIP

Policies specifically in relation to the Defined Benefit (DB) Section

Plan objectives

The Trustee’s primary investment objective for the DB section is to limit the risk of the assets not being sufficient to meet the liabilities. It aims to do this by ensuring adequate asset growth, noting that this will be made up of both investment returns and future contributions. In addition, the Trustee also aims to work progressively towards a fully funded position for the recently merged Purolite Section of the Plan

	This objective remained unchanged over the Plan year.
Investment strategy	<p>In March 2022, the Trustee and Principal Employer agreed on a new dynamic de-risking framework for the Nalco, Chemicals, and Pest sections of the Plan. The agreed initial and endgame allocations are as follows:</p> <p>In November 2024, each of these three sections had reached the end of this de-risking framework.</p> <p>The assets for the Purolite Section are managed according to a different investment strategy, reflecting the considerable difference in funding position compared to the other sections. All funds across all Sections are managed by one investment manager, Legal & General Investment Management.</p> <p>The current target allocation for each of the four sections:</p> <ul style="list-style-type: none"> ▪ Nalco section: 17.5% growth / 82.5% matching ▪ Chemicals section: 17.5% growth / 82.5% matching ▪ Pest section: 17.5% growth / 82.5% matching ▪ Purolite section: 65.0% growth / 35.0% matching

Policies specifically in relation to the Defined Contribution (DC) Section

Plan objectives	<p>The Trustee has ensured that an appropriate range of investment options are available to members, in order to provide a fund which will be used to secure members' benefits at retirement.</p> <p>The Trustee also offers a default option as well for those members who do not wish to make the investment decisions themselves. The default option utilises a lifestyle strategy to automatically switch assets into lower risk funds as retirement approaches.</p>
Investment strategy	<p>The Trustee carried out a review of the default strategy in May 2023 to ensure it remains appropriate to the membership profile of the Plan.</p> <p>Following the review, the Trustee decided to implement an additional lifestyle investment strategy targeting drawdown as a further self-select option, to provide a specific option for members that were expecting to access their savings flexibly.</p> <p>The new option was introduced in February 2024.</p> <p>The next investment strategy review is due to take place in May 2026.</p>
Legacy AVCs	<p>The One Ecolab Pension Plan (the "Plan") had legacy Additional Voluntary Contribution ("AVC") arrangements with Standard Life, Clerical Medical, Prudential, Legal & General Investment Management, Utmost and Phoenix Life.</p> <p>The Trustee carried out a Value for Members assessment of the Plan's AVC arrangements in August 2022. The assessment found that the AVC arrangements offered below average value to members and therefore the Trustee agreed to harmonise members' AVC benefits into the DC Section of the Plan which is administered by Legal & General.</p> <p>Members who are entitled to valuable guarantees, or that would suffer financial detriment, were excluded from the harmonisation exercise. The review concluded that members with those entitlements remained in the legacy policies with Prudential and Phoenix Life.</p> <p>The harmonisation project concluded for the remaining arrangements into the DC Section of the Plan, in December 2023</p>

Policies across both DB and DC sections

<p>Assessment of performance of investment managers</p>	<p>The Trustee receives quarterly updates from the investment consultant on the investment managers' performances and whether there have been any changes to the investment manager's research ratings. This is discussed at Trustee meetings together with whether the manager is performing in line with the Plan's objectives. The Trustee is satisfied that the manager is engaging with investee companies in a manner aligned with the Plan's long-term investment objectives.</p> <p>Assets in both the DB and DC sections are primarily passive investments and have broadly performed in line with benchmarks, noting that some of the benchmarks are comparators as opposed to market indices.</p>
<p>Engagement with investment managers</p>	<p>The Trustee used their investment consultant to engage with the investment manager as part of the changes in the portfolio over the Plan year in relation to the investment strategy changes outlined above. This includes consideration of all financially material factors, including ESG-related issues.</p> <p>The Trustee aims to meet LGIM bi-annually to understand their approach to engaging on Environmental, Social and Governance (ESG) matters and the options the Trustee has readily available that are proportionate to the size of the Plan.</p>
<p>Exercising of voting rights</p>	<p>The Trustee's policy is to delegate responsibility of the exercising of ownership rights (including voting rights) attached to investments to the investment managers.</p> <p>The Trustee asked their investment manager to review both the managers' voting and engagement policy while the Trustee reviewed the voting information provided by the investment managers while preparing this statement. The Trustee will be using this analysis to inform its future decision making on manager selection.</p>
<p>Sustainable Investments</p>	<p>The Trustee's policy is that day-to-day decisions relating to the investment of Plan assets is left to the discretion of its investment manager. This includes consideration of all financially material factors, including ESG-related issues where relevant. The Trustee explores these issues with its managers to understand how they exercise these duties in practice and receives reports on how these issues are addressed.</p> <p>When considering the appointment of new managers, and reviewing existing managers, the Trustee, together with its investment consultant, looks to take account of the approach taken by managers with respect to sustainable investing including voting policies and engagement where relevant.</p>
<p>Portfolio turnover</p>	<p>During the year, the Trustee's investment consultant reviewed and reported to the Trustee on the total fees and costs incurred by the Plan through its investments. Most of the funds held by the Plan track an index which will have turnover dictated by index rebalancing/reconstitution rules. These rules can vary by index provider and turnover can vary significantly.</p>
<p>Managing risk</p>	<p>The Trustee manages risk at an aggregate level through a risk register.</p> <p>In relation to the investment related risks of the DB section, the Statement of Investment principles sets out more information how each risk is monitored and mitigated.</p>

Non-financial matters policy

Non-financial matters, such as the views of beneficiaries and members of the Plan, have not been (and are not ordinarily) taken into account in determining the Trustee's investment principles or the current investment strategy.

Summary of voting over the year to 31 March 2025

The Trustee's policy is to delegate responsibility for the exercising of ownership rights (including voting rights) attached to its investments to the investment managers. Voting activity is undertaken in line with the voting policy of the investment manager. The Trustee has assessed the investment manager's voting policy as part of its overall assessment of the investment manager's capabilities. The Trustee considered the policy to be appropriate, and consistent with the Trustee's policies and objectives and ultimately therefore in the best financial interests of the members.

DB Section

A summary of the votes made by the Plan's investment managers on behalf of the Trustee over the year to 31 March 2025 is provided in the table below:

Fund	Number of meetings at which the manager was eligible to vote	Number of resolutions on which manager was eligible to vote	% of resolutions voted	% of votes with management	% of votes against management	% abstained
LGIM All World Equity Index Fund	6,611	63,689	99.82%	79.48%	18.99%	1.52%
LGIM All World Equity Index Fund - GBP Currency Hedged	6,611	63,689	99.82%	79.48%	18.99%	1.52%

Voting information on the Plan's property and bond funds is not provided since most of the loan and debt securities do not come with voting rights.

DC Section

A summary of the votes made by L&G on behalf of the Trustee over the year to 31 March 2025 is provided in the table below:

Fund	Number of meetings at which the manager was eligible to vote	Number of resolutions on which manager was eligible to vote	% of resolutions voted	% of votes with management	% of votes against management	% abstained
L&G World (ex UK) Equity Index Fund	2,810	33,423	99.72%	77.91%	21.79%	0.3%
L&G World Emerging Markets Equity Index Fund	4,366	34,789	99.94%	80.37%	17.12%	2.51%
L&G Blended Global Equity Index (G) Fund	6,611	63,678	99.82%	79.48%	19%	1.52%
L&G Diversified Fund	10,798	106,990	99.77%	76.53%	22.36%	1.1%

Significant votes

DB Section

The table below demonstrates the most significant votes cast on behalf of the Trustee over the year to 31 March 2024. Where managers provided multiple examples of “significant votes”, the top three have been shown below.

Fund	Most significant votes cast
LGIM All World Equity Index Fund	<p>Company: Microsoft Corporation</p> <p>Date of vote: 10 December 2024</p> <p>Summary of the resolution: Resolution 9: Report on AI Data Sourcing Accountability</p> <p>How the manager voted: For</p> <p>Rationale: Shareholder Resolution - Governance: A vote FOR this resolution is warranted as the company is facing increased legal and reputational risks related to copyright infringement associated with its data sourcing practices. While the company has strong disclosures on its approach to responsible AI and related risks, shareholders would benefit from greater attention to risks related to how the company uses third-party information to train its large language models.</p> <p>Outcome: Fail</p> <p>Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.</p> <p>Reason significant: High Profile meeting: This shareholder resolution is considered significant due to the relatively high level of support received.</p>
	<p>Company: Shopify Inc.</p> <p>Date of vote: 6 April 2024</p> <p>Summary of the resolution: Resolution 1A: Elect Director Tobias Lutke</p> <p>How the manager voted: Against</p> <p>Rationale: Climate Impact Pledge: A vote against is applied as the company is deemed to not meet minimum standards with regard to climate risk management. Joint Chair/CEO: A vote against is applied as LGIM expects companies to separate the roles of Chair and CEO due to risk management and oversight concerns.</p> <p>Outcome: Pass</p> <p>Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.</p> <p>Reason significant: Thematic - Climate: LGIM considers this vote to be significant as it is applied under the Climate Impact Pledge, our flagship engagement programme targeting companies in climate-critical sectors. More information on LGIM's Climate Impact Pledge can be found here: https://www.lgim.com/uk/en/responsible-investing/climate-impact-pledge/ Thematic - Board Leadership: LGIM considers this vote to be significant as it is in application of an escalation of our vote policy on the topic of the combination of the board chair and CEO.</p>
	<p>Company: First International Bank of Israel Ltd.</p> <p>Date of vote: 12 December 2025</p>

	<p>Summary of the resolution: Resolution 6: Reelect Zvi Abba Levron as Director</p> <p>How the manager voted: Against</p> <p>Rationale: Audit Committee: A vote against is applied as LGIM expects the Committee to be comprised of independent directors. Climate Impact Pledge: A vote against is applied as the company is deemed to not meet minimum standards with regard to climate risk management..</p> <p>Outcome: N/A</p> <p>Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.</p> <p>Reason significant: Thematic - Climate: LGIM considers this vote to be significant as it is applied under the Climate Impact Pledge, our flagship engagement programme targeting companies in climate-critical sectors. More information on LGIM's Climate Impact Pledge can be found here: https://www.lgim.com/uk/en/responsible-investing/climate-impact-pledge/.</p>
<p>LGIM All World Equity Index Fund - GBP Currency Hedged</p>	<p>Company: Exxon Mobil Corporation</p> <p>Date of vote: 29 May 2024</p> <p>Summary of the resolution: Resolution 4: Revisit Executive Pay Incentives for GHG Emission Reductions</p> <p>How the manager voted: Against</p> <p>Rationale: Shareholder Resolution - Climate change: A vote against is applied as LGIM expects companies to be taking sufficient action on the key issue of climate change.</p> <p>Outcome: N/A</p> <p>Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.</p> <p>Reason significant: Pre-declaration and High-Profile Meeting: This shareholder resolution is considered significant due to misleading proposals (shareholder resolutions brought with the aim of undermining positive environmental, social and governance behaviours) are a relatively recent phenomenon. Such proposals often appear to be supportive of, for example, the energy transition but, when considered in depth, are actually designed to promote anti-climate change views.</p> <hr/> <p>Company: Shell Plc</p> <p>Date of vote: 21 May 2024</p> <p>Summary of the resolution: Resolution 22: Approve the Shell Energy Transition Strategy</p> <p>How the manager voted: For</p> <p>Rationale: Climate change: A vote against is applied. We acknowledge the substantive progress the company has made in respect of climate related disclosure over recent years, and we view positively the commitments made to reduce emissions from operated assets and oil products, the strong position taken on tackling methane emissions, as well as the pledge of not pursuing frontier exploration activities beyond 2025. Nevertheless, in light of the revisions made to the Net Carbon Intensity (NCI) targets, coupled with the ambition to grow its gas and LNG business this decade, we expect the company to better demonstrate how these plans are consistent with an orderly transition to net-zero emissions by 2050. In essence, we seek more clarity regarding the expected lifespan of the assets Shell is looking to further develop, the level of flexibility in revising production levels against a range of scenarios and tangible actions taken across the value chain to deliver customer decarbonisation. Additionally, we would benefit from further transparency regarding lobbying activities in regions where hydrocarbon production is expected to play a significant role, guidance on capex allocated to low carbon beyond 2025 and the application of responsible divestment principles involved in asset sales, given portfolio changes form a material lever in decarbonization strategy.</p> <p>Outcome: Pass</p>

	<p>Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.</p> <p>Reason significant: LGIM is publicly supportive of so called "Say on Climate" votes. We 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, LGIM deem such votes to be significant, particularly when LGIM votes against the transition plan.</p> <hr/> <p>Company: Unilever Plc</p> <p>Date of vote: 1 May 2024</p> <p>Shareholder resolution: Resolution 4: Approve Climate Transition Action Plan</p> <p>How the manager voted: For</p> <p>Rationale: Climate change: A vote FOR the CTAP is applied as we understand it to meet LGIM's minimum expectations. This includes the disclosure of scope 1, 2 and material scope 3 GHG emissions and short, medium and long-term GHG emissions reduction targets consistent with a 1.5°C Paris goal. Despite the SBTi recently removing their approval of the long-term scope 3 target, we note that the company has recently submitted near term 1.5 degree aligned scope 3 targets to the SBTi for validation and therefore at this stage believe the company's ambition level to be adequate. We therefore remain supportive of the net zero trajectory of the company at this stage.</p> <p>Outcome: Pass</p> <p>Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress..</p> <p>Reason significant: Thematic - Climate: LGIM is publicly supportive of so called "Say on Climate" votes. We 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, LGIM deem such votes to be significant, particularly when LGIM votes against the transition plan.</p>
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DC Section

The table below sets out details of significant votes cast on behalf of the Trustee over the year to 31 March 2025. L&G provided multiple examples of what they consider to be "significant votes", and those set out below are votes for companies that represent the three largest components within the four funds shown.

Fund	Most significant votes cast
L&G World (ex UK) Equity Index Fund	<p>Company: Microsoft Corporation</p> <p>Date of vote: 10 December 2024</p> <p>Summary of the resolution: Resolution 9: Report on AI Data Sourcing Accountability</p> <p>How the manager voted: For</p> <p>Rationale: Shareholder Resolution - Governance: A vote FOR this resolution is warranted as the company is facing increased legal and reputational risks related to copyright infringement associated with its data sourcing practices. While the company has strong disclosures on its approach to responsible AI and related risks, shareholders would benefit from greater attention to risks related to how the company uses third-party information to train its large language models</p> <p>Outcome: Fail</p>

Next steps: GIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.

Reason significant: High Profile meeting: This shareholder resolution is considered significant due to the relatively high level of support received.

Company: Meta Platforms, Inc.

Date of vote: 29 May 2024

Summary of the resolution: Resolution 1.1: Elect Director Peggy Alford
How the manager voted: Against

Rationale: Diversity: A vote against is applied as LGIM expects a company to have at least one-third women on the board. Lead Independent Director: A vote against is applied as LGIM expects companies to elect an independent lead director where there is a combined Board Chair and CEO. Remuneration: A vote against has been applied as LGIM expects companies to obtain annual shareholder approval of executive directors pay and non-executive directors fees. Remuneration: A vote against is applied because LGIM does not support the use of corporate jets for private use. Remuneration - Malus & Clawback: A vote against is applied as LGIM expects all incentives to be subject to clawback if the vested award is later deemed to be unjustified. Remuneration - Shareholding Guidelines: A vote against is applied as the company does not have a shareholding guideline in place for executives. LGIM believes a shareholding requirement is a good way to align with long term shareholder interests because executives are expected to maintain a proportion of earned shares at risk over the medium term. Remuneration - Performance conditions: A vote against is applied as LGIM expects a sufficient portion of share incentive awards to be assessed against long term performance conditions to ensure alignment of remuneration with company performance. Remuneration - Performance period: A vote against is applied as LGIM expects performance to be measured over a three year period. A WITHHOLD vote is further warranted for Peggy Alford in her capacity as chair of the compensation, nominating, & governance committee due to consecutive years of high director pay without reasonable rationale disclosed.

Outcome: N/A

Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.

Reason significant: Thematic - Diversity: LGIM views gender diversity as a financially material issue for our clients, with implications for the assets we manage on their behalf.

Company: Amazon.com, Inc.

Date of vote: 22 May 2024

Shareholder resolution: Resolution 6: Report on Customer Due Diligence

How the manager voted: For

Rationale: Shareholder Resolution "Human Rights: A vote in favour is applied as enhanced transparency over material risks to human rights is key to understanding the company's functions and organisation. While the company has disclosed that they internally review these for some products and has utilised appropriate third parties to strengthen their policies in related areas, there remains a need for increased, especially publicly available, transparency on this topic.

Outcome: N/A

Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.

Reason significant: Pre-declaration and High-Profile Meeting: This shareholder resolution is considered significant as one of the largest companies and employers not only within its sector but in the world, we believe that Amazon's approach to human capital management issues has the potential to drive improvements across both its

	<p>industry and supply chain. LGIM voted in favour of this proposal last year and continue to support this request, as enhanced transparency over material risks to human rights is key to understanding the company's functions and organisation. While the company has disclosed that they internally review these for their products (RING doorbells and Rekognition) and has utilised appropriate third parties to strengthen their policies in related areas, there remains a need for increased, especially publicly available, transparency on this topic. Despite this, Amazon's coverage and reporting of risks falls short of our baseline expectations surrounding AI. In particular, we would welcome additional information on the internal education of AI and AI-related risks.</p>
<p>L&G World Emerging Markets Equity Index Fund</p>	<p>Company: Alibaba Group Holding Limited Date of vote: 22 August 2024 Summary of the resolution: Resolution 5.4: Elect Director Irene Yun-Lien Lee How the manager voted: Against Rationale: Classified Board: A vote against is applied as LGIM supports a declassified board as directors should stand for re-election on an annual basis. Diversity: A vote against is applied as LGIM expects a company to have at least one-third women on the board. Board mandates: A vote against is applied because we have concerns regarding the time commitment required to manage all board positions and how this may impact their ability to remain informed and effectively contribute to board discussions. Outcome: Pass Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress. Reason significant: Thematic - Diversity: LGIM views gender diversity as a financially material issue for our clients, with implications for the assets we manage on their behalf.</p>
	<p>Company: Tencent Holdings Limited Date of vote: 14 May 2024 Summary of the resolution: Resolution 3a: Elect Charles St Leger Searle as Director How the manager voted: Against Rationale: Audit Committee: A vote against is applied as LGIM expects the Committee to be comprised of independent directors. Climate Impact Pledge: A vote against is applied as the company is deemed to not meet minimum standards with regard to climate risk management. Outcome: Pass Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress. Reason significant: Thematic - Climate: LGIM considers this vote to be significant as it is applied under the Climate Impact Pledge, our flagship engagement programme targeting companies in climate-critical sectors. More information on LGIM's Climate Impact Pledge can be found here: https://www.lgim.com/uk/en/responsible-investing/climate-impact-pledge/</p>
	<p>Company: Meituan Date of vote: 14 June 2024 Summary of the resolution: Resolution 2: Elect Wang Xing as Director How the manager voted: Against Rationale: Joint Chair/CEO: A vote against is applied as LGIM expects the roles of Board Chair and CEO to be separate. These two roles are substantially different and a division of responsibilities ensures there is a proper balance of authority and responsibility on the board. Climate Impact Pledge: A vote against is applied as the company is deemed to not meet minimum standards with regard to climate risk management. A vote AGAINST the election of Wang Xing and Mu Rongjun is warranted</p>

	<p>given that their failure to ensure the company's compliance with relevant laws and regulations raise serious concerns on their ability to fulfill their fiduciary duties in the company.</p> <p>Outcome: Pass</p> <p>Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.</p> <p>Reason significant: Thematic - Climate: LGIM considers this vote to be significant as it is applied under the Climate Impact Pledge, our flagship engagement programme targeting companies in climate-critical sectors. More information on LGIM's Climate Impact Pledge can be found here: https://www.lgim.com/uk/en/responsible-investing/climate-impact-pledge/ Thematic - Board Leadership: LGIM considers this vote to be significant as it is in application of an escalation of our vote policy on the topic of the combination of the board chair and CEO.</p>
<p>L&G Blended Global Equity Index (G) Fund</p>	<p>Company: Microsoft Corporation</p> <p>Date of vote: 10 December 2024</p> <p>Summary of the resolution: Resolution 9: Report on AI Data Sourcing Accountability</p> <p>How the manager voted: For</p> <p>Rationale: Shareholder Resolution - Governance: A vote FOR this resolution is warranted as the company is facing increased legal and reputational risks related to copyright infringement associated with its data sourcing practices. While the company has strong disclosures on its approach to responsible AI and related risks, shareholders would benefit from greater attention to risks related to how the company uses third-party information to train its large language models</p> <p>Outcome: Fail</p> <p>Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.</p> <p>Reason significant: High Profile meeting: This shareholder resolution is considered significant due to the relatively high level of support received.</p> <hr/> <p>Company: Meta Platforms, Inc.</p> <p>Date of vote: 29 May 2024</p> <p>Summary of the resolution: Resolution 1.1: Elect Director Peggy Alford</p> <p>How the manager voted: Against</p> <p>Rationale: Diversity: A vote against is applied as LGIM expects a company to have at least one-third women on the board. Lead Independent Director: A vote against is applied as LGIM expects companies to elect an independent lead director where there is a combined Board Chair and CEO. Remuneration: A vote against has been applied as LGIM expects companies to obtain annual shareholder approval of executive directors pay and non-executive directors fees. Remuneration: A vote against is applied because LGIM does not support the use of corporate jets for private use. Remuneration - Malus & Clawback: A vote against is applied as LGIM expects all incentives to be subject to clawback if the vested award is later deemed to be unjustified. Remuneration - Shareholding Guidelines: A vote against is applied as the company does not have a shareholding guideline in place for executives. LGIM believes a shareholding requirement is a good way to align with long term shareholder interests because executives are expected to maintain a proportion of earned shares at risk over the medium term. Remuneration - Performance conditions: A vote against is applied as LGIM expects a sufficient portion of share incentive awards to be assessed against long term performance conditions to ensure alignment of remuneration with company performance. Remuneration - Performance period: A vote against is applied as LGIM expects performance to be measured over a three year period. A WITHHOLD vote is further warranted for Peggy Alford in her capacity as chair of the compensation, nominating, & governance committee due to consecutive years of high director pay without reasonable rationale disclosed.</p>

	<p>Outcome: N/A</p> <p>Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.</p> <p>Reason significant: Thematic - Diversity: LGIM views gender diversity as a financially material issue for our clients, with implications for the assets we manage on their behalf.</p> <hr/> <p>Company: Amazon.com, Inc.</p> <p>Date of vote: 22 May 2024</p> <p>Summary of the resolution: Resolution 6: Report on Customer Due Diligence How the manager voted: For (Against Management Recommendation)</p> <p>Rationale: Shareholder Resolution “ Human Rights: A vote in favour is applied as enhanced transparency over material risks to human rights is key to understanding the company’s functions and organisation. While the company has disclosed that they internally review these for some products and has utilised appropriate third parties to strengthen their policies in related areas, there remains a need for increased, especially publicly available, transparency on this topic.</p> <p>Outcome: N/A</p> <p>Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.</p> <p>Reason significant: re-declaration and High-Profile Meeting: This shareholder resolution is considered significant as one of the largest companies and employers not only within its sector but in the world, we believe that Amazon’s approach to human capital management issues has the potential to drive improvements across both its industry and supply chain. LGIM voted in favour of this proposal last year and continue to support this request, as enhanced transparency over material risks to human rights is key to understanding the company’s functions and organisation. While the company has disclosed that they internally review these for their products (RING doorbells and Rekognition) and has utilised appropriate third parties to strengthen their policies in related areas, there remains a need for increased, especially publicly available, transparency on this topic. Despite this, Amazon’s coverage and reporting of risks falls short of our baseline expectations surrounding AI. In particular, we would welcome additional information on the internal education of AI and AI-related risks.</p>
L&G Diversified Fund	<p>Company: Prologis, Inc.</p> <p>Date of vote: 9 May 2024</p> <p>Summary of the resolution: Resolution 1a: Elect Director Hamid R. Moghadam How the manager voted: Against</p> <p>Rationale: Joint Chair/CEO: A vote against is applied as LGIM expects companies to separate the roles of Chair and CEO due to risk management and oversight concerns.</p> <p>Outcome: N/A</p> <p>Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.</p> <p>Reason significant: Thematic - Board Leadership: LGIM considers this vote to be significant as it is in application of an escalation of our vote policy on the topic of the combination of the board chair and CEO.</p> <hr/> <p>Company: Shell Plc</p> <p>Date of vote: 21 May 2024</p> <p>Summary of the resolution: Resolution 22: Approve the Shell Energy Transition Strategy</p>

	<p>How the manager voted: Against</p> <p>Rationale: Climate change: A vote against is applied. We acknowledge the substantive progress the company has made in respect of climate related disclosure over recent years, and we view positively the commitments made to reduce emissions from operated assets and oil products, the strong position taken on tackling methane emissions, as well as the pledge of not pursuing frontier exploration activities beyond 2025. Nevertheless, in light of the revisions made to the Net Carbon Intensity (NCI) targets, coupled with the ambition to grow its gas and LNG business this decade, we expect the company to better demonstrate how these plans are consistent with an orderly transition to net-zero emissions by 2050. In essence, we seek more clarity regarding the expected lifespan of the assets Shell is looking to further develop, the level of flexibility in revising production levels against a range of scenarios and tangible actions taken across the value chain to deliver customer decarbonisation. Additionally, we would benefit from further transparency regarding lobbying activities in regions where hydrocarbon production is expected to play a significant role, guidance on capex allocated to low carbon beyond 2025 and the application of responsible divestment principles involved in asset sales, given portfolio changes form a material lever in Shell's decarbonization strategy.</p> <p>Outcome: Pass</p> <p>Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.</p> <p>Reason significant: Thematic - Climate: LGIM is publicly supportive of so called "Say on Climate" votes. We 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, LGIM deem such votes to be significant, particularly when LGIM votes against the transition plan.</p> <hr/> <p>Company: Microsoft Corporation</p> <p>Date of vote: 10 December 2024</p> <p>Summary of the resolution: Resolution 9: Report on AI Data Sourcing Accountability</p> <p>How the manager voted: For</p> <p>Rationale: Shareholder Resolution - Governance: A vote FOR this resolution is warranted as the company is facing increased legal and reputational risks related to copyright infringement associated with its data sourcing practices. While the company has strong disclosures on its approach to responsible AI and related risks, shareholders would benefit from greater attention to risks related to how the company uses third-party information to train its large language models</p> <p>Outcome: Fail</p> <p>Next steps: LGIM will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.</p> <p>Reason significant: High Profile meeting: This shareholder resolution is considered significant due to the relatively high level of support received.</p>
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Conclusion

Based on the information set out above, the Trustee considers that all SIP policies and principles were adhered to during the year.

The Trustee of the One Ecolab Pension Plan

June 2025