

Implementation Statement

Implementation Statement, covering 1 April 2024 to 31 March 2025

The Trustees of the Littlejohn Frazer Retirement Benefits Scheme (the “Scheme”) are required to produce a yearly statement to set out how, and the extent to which, the Trustees have followed the voting and engagement policies in their Statement of Investment Principles (“SIP”) during the Scheme Year. This is provided in Sections 1 and 2 below.

The Implementation Statement (the “Statement”) is also required to include a description of the voting behaviour during the Scheme Year by, and on behalf of, Trustees (including the most significant votes cast by Trustees or on their behalf) and state any use of the services of a proxy voter during that year. As at 31 March 2025, the Scheme’s only investments were pooled government bond funds and insurance policies which carry no voting rights, accordingly the Trustees have not provided any detail of voting processes or behaviour in Section 3 below.

This Statement has been produced in accordance with the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 the Pension Protection Fund (Pensionable Service) and Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018 and the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019 as amended, the guidance published by the Pensions Regulator and the [guidance](#) on Reporting on Stewardship and Other Topics through the Statement of Investment Principles and the Implementation Statement, issued by the Department for Work and Pensions (“DWP’s guidance”) in June 2022.

1. Introduction

No changes were made to the voting and engagement policies in the SIP during the Scheme Year. The last time these policies were formally reviewed was in March 2024, replacing the September 2020 SIP. A copy of the latest SIP is available at <https://www.pkf-l.com/wp-content/uploads/2024/03/SIP-March-2024.pdf>.

The Trustees have, in their opinion, followed the policies in the relevant Scheme’s SIP during the Scheme Year. The following Sections provide detail and commentary about how and the extent to which it has done so.

2. Voting and engagement

The Trustees had delegated to their investment manager, BNY Mellon Fund Managers Limited (BNY) until 17 January 2025 and then Legal and General Assurance (Pensions Management) Limited thereafter, the exercise of any voting rights attaching to the Scheme’s investments, including voting rights, and engagement. However, the Trustees take ownership of the Scheme’s stewardship by monitoring and engaging with their manager and escalating as necessary as detailed below.

As part of its advice on the selection and ongoing review of the investment managers, the Scheme’s investment adviser, LCP, incorporates its assessment of the nature and effectiveness of managers’ approaches to voting and engagement.

Noting the DWP’s formal guidance on stewardship, the Trustees have set a single stewardship priority of ‘Climate Change’ to focus its monitoring and engagement efforts. This priority was selected because this is where most of the emphasis of recent responsible investment guidance and regulation has been, and the Trustees believe it to be a financially material risk to the Scheme.

The Trustees last met with BNY in October 2022 and were satisfied with their approach to voting and engagement. The Trustees are conscious that responsible investment, including voting and engagement, is rapidly evolving and therefore expects most managers will have areas where they could improve.

Following the decision by BNY to close the Newton Long Gilt Fund the Trustees undertook an investment strategy review and took the decision to switch assets held with BNY into two Legal &

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General funds. This switch was completed in January 2025. The Scheme's target asset allocation (excluding insurance policies) is fully into UK government bonds.

3. Description of voting behaviour during the year

The Scheme's investments comprised two BNY funds until January 2025 and then two Legal & General funds. These funds principally comprise fixed interest and index-linked gilts and are not expected to hold any physical equity holdings, and any holdings with voting rights attached to them are expected to be only a small proportion of the Scheme's total assets. The Trustees are not aware that any of these funds had voting opportunities during the Scheme Year. Accordingly, the Trustees have not provided any detail of voting processes or behaviour over the Scheme Year, given there were no voting opportunities.