

**Associated British Foods
Pension Scheme**

Annual Report and Accounts

Year ended 5 April 2026

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ASSOCIATED BRITISH FOODS PENSION SCHEME

Scheme Number **10150279**

MANAGEMENT OF THE SCHEME

Trustee Directors:

James West (The Chair)[#] (resigned 27 November 2025)
Colin Hatley (The Chair) (appointed 27 November 2025)
Giles Haig (resigned 30 April 2025)
Sarah Clifton (previously Giffen)*
James Rushton
Kelly Brown
Trevor Smith*
Clair McGarry (appointed 22 May 2025)
Paul Lister (resigned 26 February 2026)
Darren Clark* (appointed 27 November 2025)
Will Reckitt* (appointed 22 May 2025 and resigned 19 August 2025)
Keith Burns[#] (appointed 26 February 2026)
Miles McCarthy (appointed 26 February 2026)
[#]Independent Director *Member Nominated Director

**Secretary to Trustee and
Group Pensions Director:**

Colin Hatley (resigned 27 November 2025)

**Secretary to Trustee and
Head of Group Pensions:**

Peter Morris (appointed 27 November 2025)

Principal Employer:

Associated British Foods Plc
Weston Centre
10 Grosvenor Street
London W1K 4QY

Actuary:

Sam Eida
Mercer Ltd
1 Tower Place West
Tower Place
London EC3R 5BU

Administrator:

ABF Group Pensions Department
1 Bayley Street
London WC1B 3HB

Auditor:

Ernst & Young LLP
G1 Building
5 George Square
Glasgow
G2 1DY

Banker:

Bank of Scotland
Citymark
150 Fountainbridge
Edinburgh EH3 9PE

Investment Consultant:

Mercer Ltd
1 Tower Place West
Tower Place
London EC3R 5BU

Property Administrator:

Workman LLP
Alliance House
12 Caxton Street
London SW1H 0QS

Property Valuer:

CB Richard Ellis
St Martins Court
10 Paternoster Row
London EC4M 7HP

Solicitor:

Travers Smith
3 Stonecutter Street
London EC4A 4AW

ASSOCIATED BRITISH FOODS PENSION SCHEME

MANAGEMENT OF THE SCHEME (continued)

Investment Managers:

(DB Section)

Alcentra Ltd	Cannon Place, 78 Cannon St, London, EC4N 6HL
Ares Management Ltd	10 New Burlington Street, 6th floor, London, W1S 3BE
Artemis Investment Management LLP (terminated 7 July 2025)	Cassini House, 57 St James Street, London, SW1A 1LD
Beach Point Capital Management LP	1620 26th Street, Suite 6000N, Santa Monica, CA 90404, USA
Arcmont Asset Management Ltd	5 Hanover Square, London, W1S 1HE
BlackRock Investment Management (UK) Ltd	12 Throgmorton Street, London, EC2N 2DL
Bridgepoint Advisors Ltd	5 Marble Arch, London, W1H 7EJ
Calamos Investments LLC	2020 Calamos Court, Naperville, IL 60563-2787, USA
Capital International Ltd (appointed 23 May 2025)	1 Paddington Square, London, W2 1GL
Clearlake Credit (previously MV Credit Partners LLP)	45 Old Bond St, London, W1S 4QT
Cordet Capital Partners LLP	2 St James's Market, St. James's, London, SW1Y 4SB
CQSM LLP	1 Strand, London, WC2N 5HR
Goldman Sachs Asset Management Inc	25 Shoe Ln, London, EC4A 4AU
Hay Financial Management LLP	One Eagle Place, London, SW1Y 6AF
H.I.G Capital International Advisors LLP (notice of termination 8 January 2025)	10 Grosvenor Street, London, W1K 4QB
Insight Investment Management Ltd	160 Queen Victoria Street, London, EC4V 4LA
Liontrust Asset Management Plc	2 Savoy Court, London, WC2R 0EZ
Loomis Sayles Investment Ltd (appointed 23 May 2025)	One New Change, London, EC4M 9AF
Morgan Stanley	100 Front Street, 8th Floor, West Conshohocken, PA 19428, USA
Muzinich & Co	8 Handover Street, London, W1S 1YQ
Neuberger Berman	Zig Zag, The, Building 70 Victoria St, London, SW1E 6SQ
Ninety One Global	55 Gresham Street, London, EC2V 7EL
PGIM Ltd (appointed 23 May 2025)	Grand Buildings. 1-3 Strand, London, WC2N 5HR
Schroder Investment Management Ltd	1 London Wall Place London, EC2Y 5AU
Veritas Asset Management LLP (terminated 7 July 2025)	1 Smarts Place, London, England, WC2B 5LW

Custodian:

Northern Trust LLP	50 Bank Street, Canary Wharf, London, E14 5NT
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Investment Managers:

(DC Section)

Mobius Life (an insurance company investment platform providing a range of funds which includes AVC holdings)	2nd Floor, 2 Copthall Avenue, London, EC2R 7DA
AllianceBernstein	60 London Wall, London, EC2M 5SJ

ASSOCIATED BRITISH FOODS PENSION SCHEME

TRUSTEE'S REPORT

The Directors of the Trustee present their Annual Report of the Associated British Foods Pension Scheme (the "Scheme"), together with the Financial Statements for the year ended 5 April 2026. The Investment Reports set out on pages 12 to 16 and the Compliance Statement on page 9 form part of this Trustee's Report.

Introduction

The Scheme comprises:

- the Defined Contribution (DC) Section, which provides benefits based on the member's accumulated fund value at retirement, and
- the Defined Benefit (DB) Section, which provides benefits based on the member's final salary and length of service. In this Annual Report and in the Financial Statements the phrase "DB Section" refers to all four DB Sections (ABF Main, ABF Executive, British Sugar and British Sugar Senior) unless otherwise specified.

Members of both Sections are able to make Additional Voluntary Contributions (AVCs) to secure additional benefits. The DB Section is closed to new entrants.

Trustee Directors

Associated British Foods Pension Trustees Limited is the sole corporate Trustee of the Scheme. The appointment of new or additional Company appointed Trustee Directors and their removal from office is the responsibility of Associated British Foods Plc (ABF Plc). The Trustee Board consists of nine directors: six Company appointed including the Trustee Chair and three member nominated Directors (MNT).

The Full Board of the Trustee met four times during the Scheme year. The Board has three subcommittees that deal with specific aspects of Trustee responsibility in greater detail and which report to the Full Board. The number of subcommittee meetings held during the Scheme year (shown in brackets) and the Trustee Directors who were members of these subcommittees since the start of the Scheme year are:

Audit subcommittee (2):	James Rushton (chair) Sarah Clifton (stepped down) Trevor Smith Will Reckitt (appointed and resigned) Darren Clark (appointed) Keith Burns (appointed)	Colin Hately (appointed) Giles Haig (resigned) Clair McGairy (appointed) Kelly Brown (appointed) Miles McCarthy (appointed)
Investment subcommittee (4):	James West (<i>chair resigned</i>) Sarah Clifton Sir Guy Weston Clair McGairy (appointed) Keith Burns (appointed)	Colin Hately (appointed chair) Giles Haig (resigned) James Rushton Miles McCarthy (appointed)
Property subcommittee (2):	James West (<i>chair resigned</i>) Paul Lister (resigned) Sir Guy Weston	Colin Hately (appointed chair) Trevor Smith James Rushton

During the Scheme year, Giles Haig resigned from the Trustee Board on 30 April 2025. Will Reckitt and Clair McGairy were appointed as Member Nominated Trustee Directors on 22 May 2025 with Will Reckitt subsequently resigning on 19 August 2025. On 27 November 2025, James West resigned as Chair of the Trustee and was succeeded by Colin Hately; Darren Clark was also appointed as a Member Nominated Trustee Director on the same date. Paul Lister resigned from the Trustee Board on 26 February 2026, Keith Burns was appointed as an Independent Trustee Director and Miles McCarthy was appointed as a Company appointed Trustee Director on that date.

Sir Guy Weston is a member of the Investment and Property subcommittees. Sir Guy Weston is not a Trustee Director but provides expertise to the subcommittees.

Administration

The Scheme is administered on behalf of the Trustee by the ABF Group Pensions Department, 1 Bayley Street, London, WC1B 3HB. Any general enquiries about the Scheme or requests for information from members should be sent to this address, to pensions.admin@abfoods.com or called on 0207 636 8111.

ASSOCIATED BRITISH FOODS PENSION SCHEME

TRUSTEE'S REPORT (continued)

Principal and Participating Employers

The Principal Employer (the "Company") is Associated British Foods Plc, Weston Centre, 10 Grosvenor Street, London, W1K 4QY on behalf of the participating group companies. Additional participating employers are Fortnum and Mason Plc and Wittington Investments Ltd.

Membership changes

The membership of the Scheme at the beginning and end of the Scheme year and changes during the year are set out below.

Active Members	<u>DB Section</u>	<u>DC Section</u>
Active membership at 5 April 2025	799	24,392
Prior year adjustment	18	(1)
Add: New entrants during year	-	10,113
Less: Retirements	(75)	(344)
Leavers with deferred pension	(33)	(6,923)
Leavers awaiting option	(27)	(455)
Leavers with refunds of contributions	-	(1,956)
Transfers out to other Schemes	-	(73)
Deaths in service	(3)	(22)
No liability	-	(106)
Active membership at 5 April 2026	679	24,625
Pensioners		
Pensioners at 5 April 2025	14,279	-
Prior year adjustment	-	-
Add: New pensioners	423	-
Dependants' pensions	187	-
Less: Pensions ceasing	(617)	-
Pensioners at 5 April 2026	14,272	-
Deferred Pensioners		
Deferred Pensioners at 5 April 2025	5,411	44,251
Prior year adjustment	(10)	(2)
Add: New entrants during year	33	6,923
New entrants (pending status)	27	455
Reinstatements	-	1
Less: Refunds	-	(83)
Transfers out to other Schemes	(4)	(370)
Retirement	(348)	(392)
Deaths	(16)	(30)
No liability	-	(104)
Forfeiture of benefits	(9)	-
Deferred Pensioners at 5 April 2026	5,084	50,649

The opt outs are accounted for on a gross basis as recommended by the SORP.

Prior year adjustments relate to timing differences when reconciling the membership.

The no liability active members relate to auto-enrolment members who have opted out before any contributions have been deducted.

ASSOCIATED BRITISH FOODS PENSION SCHEME

TRUSTEE'S REPORT (continued)

Pension increases

In April 2025 pensions in excess of the Guaranteed Minimum Pension (GMP) accrued prior to January 2008 were increased by 3.5% for all pensioners who had been retired for one year or more. Pensions in excess of the GMP accrued from January 2008 were increased by 2.5%. Post 88 GMP was increased by 1.7%.

In April 2026, pensions were increased in line with the new pension tranches introduced as a result of GMP equalisation, where previous GMP benefits had been converted into Scheme pension. The tables below set out how pension increases have been applied across these different tranches. Where post GMP benefits currently remain for some pensioners the post 88 GMP was increased by 3.0%.

For pensioners where GMP benefits have been converted:

Pension accrued prior to April 1997 capped at 3.0%	3.0%
Pension accrued prior to April 1997 capped at 5.0%	4.2%

For pensioners where GMP benefits remain:

Pension in excess of the GMP accrued prior to January 2008	4.2%
Pension in excess of the GMP accrued from January 2008	2.5%

Pensioners who had been retired for less than one year on the increase date received a proportion of the full increase.

Deferred pensions have been increased in line with statutory requirements. Deferred pensioners are protected against inflation by the application of government prescribed statutory revaluation orders measured over the period of deferment to retirement date. In accordance with the Rules of the Scheme the annual increase is applied for British Sugar Section pensioner members with effect from 1 April and for other pensioner members with effect from 6 April.

All increases were in accordance with the Trust Deed and Rules of the Scheme or legislative requirements. There were no discretionary increases awarded in the year.

Pension Protection Fund (PPF)

The PPF and Pensions Regulator levies paid by the Scheme for 2025/26 totalled £321,979 (2024/25: £298,847).

DC Administration and Investment platform

The administration of the Scheme is undertaken by the ABF Group Pensions Department.

Mobius Life are the DC and AVC investment platform provider.

Trust Deed and Rules

The Scheme is governed by a Trust Deed and Rules which was updated on 5 April 2016 and has been effective since 6 April 2016 with subsequent amendments. A copy of the Trust Deed and Rules may be obtained by writing to the Secretary to the Trustee at 1 Bayley Street, London, WC1B 3HB.

During the year the Trustee signed one deed of amendment on 23 December 2025. The deed of amendment made effective immediate Guaranteed Minimum Pension conversion in bulk for conversion members. The conversion did not apply to all members with GMP as part of their pension benefit held in the Scheme. The Trustee will address GMP conversion in respect of carved-out conversion members at a later date.

GMP equalisation

A High Court judgement in October 2018 ruled that pension schemes must equalise Guaranteed Minimum Pension (GMP) benefits for male and female members. A follow up High Court judgement in November 2020 extended the requirements to equalise GMP benefits to include previous members who had transferred benefits from the Scheme. The Trustee has consulted the Scheme Actuary and legal advisers to consider the implications of these judgements.

At the Trustee board meeting in March 2025 the Trustee agreed to use the conversion (D2) method to equalise GMPs. The legislation stipulates that the Trustee is required to obtain consent for this method of equalisation from the Scheme's

ASSOCIATED BRITISH FOODS PENSION SCHEME

sponsoring employer and consult with all affected members prior to conversion. ABF plc, as sponsoring employer, replied to the written request from the Trustee formally consenting to GMP benefits within the Scheme being equalised using the conversion (D2) method. The sponsoring employer has consulted with affected members and, in October 2025, confirmed the outcome of that consultation, which was to proceed with the conversion method to equalise GMPs from 1 January 2026 for pensioners and members with deferred pension benefits.

The Scheme Actuary has provided a certificate of actuarial equivalence confirming that the GMP conversion calculations have been carried out in line with legislative requirements. The Scheme Actuary has also produced final benefit calculations using the conversion method. These calculations indicate an increase in the value of the technical provisions for the Scheme as a result of GMP equalisation of £16.3 million.

The costs of equalising the GMP benefits are being accounted for in these financial statements as they are determined, as outlined in note 25 of the financial statements.

For members and previous members where GMP benefits remain, the Trustee is undertaking separate sweep-up exercises to convert those GMP benefits.

Actuarial valuation

The financial statements on pages 21 to 43 do not take into account obligations to pay pensions and other benefits which fall due after the end of the Scheme year. The actuarial position of the Scheme, which does take account of such obligations, is considered by the Scheme Actuary who regularly reviews the obligations and reports to the Trustee. In addition to the regular reviews a full actuarial valuation is carried out every three years.

The most recent formal actuarial valuation carried out as at 5 April 2023 showed a funding level on an ongoing cautious basis of 138% with a past service surplus of £1,013m. Since the formal actuarial valuation, the funding position has improved further as at 5 April 2025.

The Schedule of Contributions applicable for the year were signed on 29 September 2023. As part of that Schedule, it was agreed that in the event that the Scheme is above 110% funded on the ongoing funding basis at each 5 April, then the Trustee and Employer may agree to a contribution abatement. This abatement would commence on 1 October each year for a period of 12 months and cover one or more of the following four elements of the Employer's contributions:

- Employer contributions in respect of future accrual of benefits in the Defined Benefit sections
- Employer contributions in respect of administration and other costs in the Defined Benefit and Defined Contribution sections
- Employer contributions in respect of Defined Contribution risk benefits
- Employer contributions in respect of future accrual of benefits in the Defined Contribution section

A subsequent Schedule of Contributions has been signed since year end on 31 July 2026.

The Available Surplus (defined as one third of surplus assets above the 110% funding level) was £250m at 5 April 2023, £342m at 5 April 2024, and £327m at 5 April 2025. A contribution abatement (i.e. a contribution holiday) was therefore agreed for 2023/24, 2024/25 and 2025/26 covering all four elements of employer contributions listed above. The contribution abatement for the 6 months from 1 October 2023 to 5 April 2024 was £30m, for the year to 5 April 2025 it was £65m, and for the year to 5 April 2026 it is £68m.

In practice this means that with effect from 1 October 2023 up to the end of the 2025/26 Scheme year:

- There are no DB or DC employer contributions.
- DC Employer contributions are replaced by a transfer of funds from the DB section surplus to ensure that all members have their full contribution entitlement invested in line with their agreed contribution rates prior to the abatement.
- Member benefits are not affected by the contribution abatement. All benefits continue to be calculated and settled in accordance with the Trust Deed and Rules.

If the Scheme had been discontinued as at the 5 April 2023 valuation date it is estimated there would have been sufficient Scheme assets to buy out all the benefits with an insurance policy. The estimated wind-up funding level at the 5 April 2023 valuation date was 132%. Again, this has improved significantly since the 2023 valuation date.

The Scheme's next formal actuarial valuation at 5 April 2026 is currently underway.

ASSOCIATED BRITISH FOODS PENSION SCHEME

TRUSTEE'S REPORT (continued)

Report on Actuarial Liabilities

FRS102 requires a Report on Actuarial Liabilities to be provided alongside the financial statements. This has been included on page 47.

Actuarial certificate

The latest Certification of the Schedule of Contributions from the Actuary is on page 46.

Financial Statements

The financial statements for the year as set out on pages 21 to 43 have been prepared and audited in accordance with Section 41(1) and (6) of the Pensions Act 1995.

Global Conflicts

The Trustee continues to monitor investment exposure and the impact of geopolitical risks on the employer covenant. The Scheme has no material exposure to areas currently affected by conflict and has not been materially affected.

Taskforce on Climate-Related Financial Disclosure (TCFD)

As the Pension Scheme has net assets of greater than £1bn, the Trustee is required to produce and publish a TCFD report for the year ended 5 April 2026. This can be found at www.abfpensions.com/db/tcfd

ASSOCIATED BRITISH FOODS PENSION SCHEME

COMPLIANCE STATEMENT

TAX STATUS

The Scheme is a registered pension scheme under Chapter 2 of Part 4 of the Finance Act 2004.

TRANSFER VALUES (DB Section)

All cash equivalent transfer values paid out of the Scheme are calculated and verified in accordance with the requirements of Section 97 of the Pension Schemes Act 1993.

The calculation of transfer values makes no allowance for discretionary increases to pensions once in payment, but takes account of the early retirement terms available for members by assuming that they retire, on average, at age 62½ (or, for those members who can retire with an unreduced pension from age 60, at age 57½).

SECURITY AND CONTROL

The security of the Scheme's investments is of the utmost importance to the Trustee, which has ensured that comprehensive controls are in place to protect the assets of the Scheme. The main features of the controls are:

- i) **Detailed Scrutiny** Representatives from all investment and property managers meet the Head of Group Pensions/Secretary or Investment and Property subcommittees (as appropriate) at least once each year. In addition, the Secretary meets all managers quarterly to review the portfolio and identify any issues that need referring to the Trustee.
- ii) **External Custody** Northern Trust is the global custodian of the DB Section's securities and cash. The role of a custodian is to settle the day-to-day investment transactions made by the investment managers, collect investment income due to the Scheme and ensure the safe custody of the securities and cash. The internal controls report produced by the custodian is reviewed regularly. The records of the Scheme's securities and cash are regularly reconciled to the investment managers' statements.

The investment managers will not act on instructions from the Scheme unless those instructions are in writing and signed by two authorised signatories in accordance with the mandate approved by the Trustee Board. The Custodian will not act on instructions from the Scheme unless those instructions are executed via "Passport", the Custodian's online facility and approved by two authorised signatories.

The Title Deeds of properties owned by the DB Section are held by Katten Muchin Rosenman LLP and CMS Cameron McKenna Nabarro Olswang LLP.

Specific Rules

The Trustee has formal written agreements with the investment and property managers which include any investment restrictions placed upon them and which set out their terms of remuneration. The DB Section investment managers are not permitted to purchase shares in Associated British Foods Plc for the Scheme, nor may the Trustee or investment managers lend funds to Associated British Foods Plc or its subsidiaries. However, the Scheme may have exposure to shareholdings in those businesses through investment in pooled vehicles.

ASSOCIATED BRITISH FOODS PENSION SCHEME

INVESTMENT REVIEW

Background

During the Scheme year, global financial markets experienced a dynamic but challenging environment shaped by geopolitical tensions, trade negotiations and evolving monetary policies. The year commenced on a volatile note, primarily influenced by the trade discussions and temporary pauses in tariffs by the US administration. Significant geopolitical issues, including escalating conflicts in the Middle East, particularly with Iran, added uncertainty and drove energy prices higher. Labour market concerns and inflation fluctuations were key determinants of the US Federal Reserve's ("Fed") monetary stance. Rate cuts were pivotal in supporting risk assets, although their impacts varied throughout the year, contributing to mixed market sentiments.

Equities

Equity markets throughout the year demonstrated resilient yet varied performance across different regions and sectors. In the quarter to June 2025, global equities, measured by the MSCI World Index, saw a 5.0% increase, driven by the constructive US trade policy shifts and strong earnings reports from leading technology firms. The quarter to September 2025 built on this momentum, with the MSCI World Index rising by 7.5%, largely due to the Fed's rate cuts and a surge in technology stocks propelled by positive sentiment around AI advancements.

Despite these gains, the quarter to December 2025 showed moderated growth with a 3.4% uptick, as volatility, particularly within the US tech sector, tempered overall market performance. The S&P 500 returned modest gains, offset by the disruptive effects of the US federal government shutdown and mixed economic data. In contrast, the quarter to March 2026 marked a reversal, with the MSCI World Index declining by 3.2%, underscored by the sharp escalation of the Iran conflict which drove energy prices higher and roiled markets globally. Notably, while US and European equities struggled, UK and Emerging Markets demonstrated relative resilience, buoyed by strong demand in commodities and favourable currency movements.

Bonds

The bond markets navigated a complex landscape of inflationary pressures, geopolitical tensions and central bank interventions throughout the year. Initially, government bonds saw modest gains, supported by rate cuts and economic stability efforts, particularly from the Fed and the European Central Bank. However, volatility sharply increased towards the end of December 2025. The Fed's successive rate cuts in early 2025 supported US Treasuries, driving yields lower and providing relative insulation during market stress. Conversely, European bonds faced pressure from rising yields and inflationary concerns.

The escalation of the Iran conflict in March precipitated a significant sell-off in global bonds, with pronounced impacts on short-term yields. UK Gilts initially outperformed, driven by positive fiscal policies and a favourable inflation outlook, but this outperformance was reversed as the conflict deepened and energy price shocks materialized. Corporate bonds faced a similar trajectory, initially benefiting from tightened credit spreads and rate cuts, but later encountering headwinds as risk aversion grew and geopolitical uncertainties intensified. Overall, the bond market's performance was marked by significant dispersion, reflecting the nuanced responses to evolving global economic conditions and policy shifts.

Amid the heightened volatility, the Scheme increased its hedging of inflation and interest rate sensitivity to 95% of the liabilities.

ASSOCIATED BRITISH FOODS PENSION SCHEME

INVESTMENT REVIEW (continued)

UK Property

The Trustee continued to review its investment strategy during the year, with the reduction in property holdings made in line with its investment objectives.

Investment disclosures for DB and DC sections

The Trustee's policy relating to rights attaching to the investments and the extent to which social, environmental or ethical considerations are taken into account in the selection, retention and realisation of investments are disclosed in the Statement of Investment Principles (SIP) and Investment Implementation Policy Document (IIPD). The SIP is appended to this report. Further information about the Scheme's position on climate related matters is disclosed in the Task Force on Climate-related Financial Disclosures document which is available on the Scheme's website.

ASSOCIATED BRITISH FOODS PENSION SCHEME

INVESTMENT REPORT - DB SECTION REVIEW

Investment management

The Trustee delegates the management of the assets to the professional external investment managers listed on page 3. The investment managers are remunerated by fees based on a percentage of the funds or property under management; and in some cases, there are additional fees based on performance. Investment mandates are in place with the managers which implement the strategy agreed upon by the Trustee Directors which includes consultation with professional advisors.

At the end of the year, the Scheme had nineteen fixed income managers (made up of thirteen private debt managers, four segregated fixed income managers, a total return fund manager and a multi-asset credit manager), a liability-driven investment (LDI) manager, three managers with global equity mandates, and a currency hedging mandate. The property portfolio is managed in-house. The Investment subcommittee believes that in the current macro-economic environment, this investment structure remains appropriate for the Scheme.

The Trustee has undertaken a fundamental review of the Investment Strategy in consultation with the principal employer. The outcome was a decision to materially reduce risk in the portfolio, with reductions in allocations to equity, property and private debt, to be replaced by Government Gilts and Investment Grade Credit, which better match the Scheme's cash flow requirements. It is anticipated this transition will take 3-5 years due to the illiquid nature of the property and private debt allocations. During the year three new fixed income managers were appointed. The Trustee has also increased the hedging levels on the liabilities to a target of c.95% for both interest rate and inflation sensitivities.

A strategic asset allocation policy is in place as shown in the table below together with the actual position at the Scheme year end. Asset allocations that fall outside the benchmark ranges at the end of a quarter are normally rebalanced during the following quarter.

Asset class	Actual %	3-5 year target benchmark allocation as at 5 April 2026 %
Fixed interest and index-linked bond (including illiquid Credit)	76.6	77.4
Global equities mandates (which may include UK)	20.7	20.6
UK property	1.1	
Cash managed in-house	1.6	2.0
Total	100.0	100.0

Cash held by investment managers is categorised in the actual position.

The portfolios are actively managed, which means that the manager is targeted to outperform specific Benchmarks by a specified amount. Fixed income managers may specifically hold cash as an asset in the portfolio and equity managers may also hold short term cash balances due to income and trading receipts. For assessing asset allocation such cash balances are included with the related asset class. Cash managed in-house, as shown in the table above, is cash held on bank deposit either awaiting investment or to cover short term funding requirements.

In accordance with section 35 of the Pension Act 1995, a SIP has been prepared by the Trustee which incorporates the investment strategy. A copy of the SIP is attached as an Appendix to this Report on page 48.

In accordance with the Rules of the Scheme and the agreements with each investment manager there has been no direct investment in the stocks of Associated British Foods Plc. Indirect investment in Associated British Foods Plc can arise through the Schroder QEP Global Active Value Fund; there was no such holding at 5 April 2026 (2025: nil).

Further details of the Scheme's investments are given in note 11 to the Financial Statements.

ASSOCIATED BRITISH FOODS PENSION SCHEME

TRUSTEE'S REPORT (continued)

INVESTMENT REPORT – DB SECTION REVIEW (continued)

Investment performance

The average yearly investment returns for the Scheme over one year, three and five years is shown in the table below with the relevant Scheme-specific benchmark for comparison. Performance is measured to 31 March 2026.

	Actual annual return %	Benchmark annual return %	AB Foods Strategic Benchmark return %
Average annual overall investment return			
Over the last Scheme year the investment return was:	7.36	7.89	3.76
Over 3 years the average return each year was:	4.19	4.48	(1.19)
Over 5 years the average return each year was:	1.61	2.76	(5.40)

Source: NT

Over the year the managers in aggregate have slightly underperformed their respective market index benchmarks. The assets grew by over 7% over the year in question with the liabilities also increasing but not to the same extent.

Background to investment strategy

Scheme liabilities are sensitive to changes in both inflation and interest rates, which are not correlated with the underlying assets held in the Scheme. In 2007/08 the Trustee commenced a programme of entering into a series of swap (derivative) contracts with leading banks designed to hedge these liabilities, that is, to move the assets in line with the liabilities. The swap contracts are held with an LDI manager. In particular, the Trustee had been mindful of the historic low interest rates, and subsequent Gilt yields, which have been prevalent in recent years. As such the Trustee had for some time been positioning the fixed income assets to benefit solvency from future rises in rates. Having now seen rates rise significantly, the Trustee has been increasing its exposure to hedging instruments, as described above to secure recent solvency gains.

The Trustee has continued to monitor the underlying performance of the individual managers, being mindful of their investment styles and the wider macro environment.

Investment - AVCs

The Trustee holds members' AVC investments that are invested separately from the main investments. At the year end, members' AVCs are invested in money purchase-type arrangements in the Mobius Life investment platform. Members participating in AVC arrangements receive a statement confirming the amounts held in their account(s) made up to 5 April each year. Details of the AVC provider and the changes during the year are given in note 17 to the Financial Statements.

ASSOCIATED BRITISH FOODS PENSION SCHEME

INVESTMENT REPORT - DC SECTION REVIEW

Investment Strategy

The Trustee has chosen to entrust the investment administration of the DC Section to Mobius Life. All investments for the DC Section are held in insurance policies with Mobius Life.

The Trustee believes that the risks identified are best managed by, and best met by, a default arrangement of Target Date Funds which are linked to a target retirement age of 65 for each particular member and by offering members a range of self-select investment vehicles from which to choose. The current self-select range has been grouped into five asset classes as follows:

- Equities
- Bonds/cash
- Diversified growth
- Alternatives
- Environmental, Social and Governance (ESG)

The range of self-select funds offered in each asset class will be reviewed periodically and changed in response to market developments or member demand.

In addition to ensuring ESG issues are fundamental into all investment decisions with individual funds, there are a number of ESG specific options available to members.

Investment Management Structure

The Trustee has appointed AllianceBernstein as investment manager of the Target Date Funds.

All Target Date and self-select funds are administered on the Mobius Life investment platform.

Monitoring the investment manager and platform provider

The Trustee monitors the performance of the default and self-investment options selected by members on a regular basis. The Trustee also monitors the effectiveness of the investment platform provider. To assist the Trustee, the investment platform provider regularly supplies the Trustee with unit reconciliations and fund factsheets.

Investment Objective

Each Target Date Fund is designed and managed for an investor saving to retire in or around the years stated in the fund's name (the Target Date). AllianceBernstein's aim is to maximise, for a typical investor, their eventual retirement income whilst taking account of their decreasing capacity to afford losses as they approach and, possibly, go past the Target Date of Retirement. On retirement, the investor is assumed to use their built-up income from the options available when they retire. As such, it will progressively move from riskier, capital-growth orientated assets, such as equities and property, into lower risk, retirement income protection orientated assets, such as bonds, as it approaches and passes its Target Date. The manager seeks to ensure that the mix of assets continues to remain appropriate given the Target Date Fund's aim and will also employ a dynamic asset allocation strategy which seeks to mitigate the effects of large market movements without detracting from long-term returns. The manager will manage the Target Date Funds such that for an individual investing over the whole term of each Target Date Fund, a real return (i.e. return above inflation) will be targeted, whilst managing risk as retirement approaches.

The Trustee regularly reviews the default strategy and the performance of the default funds against the aims and objectives set out in the Statement of Investment Principles. Following the review held on 7 March 2024, the Trustee concluded that all TDF vintages had performed well since inception net of fees. When considering the current economic environment however, the expected future performance of the current investment mix, and the risk/reward characteristics of the glidepath, the Trustee believes that the Target Default Funds will find it more difficult to meet their future objectives. The Trustee therefore conducted a detailed review of the membership profile to ensure the risk profile of the Target Date Funds remains appropriate and consider changes to the investment mix to improve the risk/reward characteristics of the glidepath. As a result, the Trustee decided to make the following changes, which were implemented from 1st July 2024.

ASSOCIATED BRITISH FOODS PENSION SCHEME

TRUSTEE'S REPORT (continued)

INVESTMENT REPORT - DC SECTION REVIEW (continued)

1. The glidepath was amended such that the de-risking of the Target Date Funds' investment mix will be postponed and the level of risk at and beyond target date increased, to reflect pension savings typically being accessed via drawdown strategies.
2. A new investment class of private credit was introduced to improve the risk/reward characteristics of the glidepath.
3. The objective for the Target Date Funds was updated to provide a real return over the life of the glidepath, whilst managing risk as retirement approaches.

Further details of these changes are explained in the DC Chair's Statement.

Self Select Funds

Following a review of the Scheme's alternative self-select fund range, undertaken with advice from Mercer, the Trustee added four funds and removed those with limited member usage or which no longer represented value for money. As a result, the Scheme now offers 38 self-select funds.

The next formal review of the Scheme's DC default investment strategy and self-select fund range is scheduled to be completed by 5 April 2027.

ASSOCIATED BRITISH FOODS PENSION SCHEME

The returns of the Target Dated Funds which represent the majority of the DC assets as at 31 March 2026 were:

Mobius Life Fund Name	£	Inception Date	12 Months		3 Years (annualised)		Since Inception (annualised)	
			Net	Benchmark	Net	Benchmark	Net	Benchmark
AB Retirement Fund 2011-2013 (ABF)	107,355.80	30/09/2012	7.67%	4.33%	6.41%	4.06%	4.07%	3.88%
AB Retirement Fund 2014-2016 (ABF)	468,622.24	30/09/2012	7.66%	4.33%	6.32%	4.06%	4.42%	3.88%
AB Retirement Fund 2017-2019 (ABF)	4,387,140.30	30/09/2012	7.65%	4.33%	6.31%	4.06%	5.08%	3.88%
AB Retirement Fund 2020-2022 (ABF)	8,025,367.06	30/09/2012	7.73%	4.33%	6.38%	4.06%	5.65%	3.88%
AB Retirement Fund 2023-2025 (ABF)	17,813,912.66	30/09/2012	7.84%	4.33%	6.50%	4.06%	6.19%	3.88%
AB Retirement Fund 2026-2028 (ABF)	51,630,321.06	30/09/2012	8.27%	4.33%	6.95%	4.06%	6.83%	3.88%
AB Retirement Fund 2029-2031 (ABF)	76,427,629.98	30/09/2012	8.73%	4.33%	7.32%	4.06%	7.25%	3.88%
AB Retirement Fund 2032-2034 (ABF)	93,357,634.42	30/09/2012	9.98%	5.36%	8.23%	5.73%	7.83%	6.24%
AB Retirement Fund 2035-2037 (ABF)	132,712,044.24	30/09/2012	11.26%	5.36%	9.39%	5.73%	8.46%	6.24%
AB Retirement Fund 2038-2040 (ABF)	137,379,912.20	30/09/2012	12.35%	5.36%	10.80%	5.73%	9.14%	6.24%
AB Retirement Fund 2041-2043 (ABF)	134,587,703.38	30/09/2012	13.27%	6.39%	12.15%	6.55%	9.80%	6.82%
AB Retirement Fund 2044-2046 (ABF)	136,357,169.11	30/09/2012	14.00%	6.39%	13.03%	6.55%	10.05%	6.82%
AB Retirement Fund 2047-2049 (ABF)	132,642,525.45	30/09/2012	14.40%	6.39%	13.17%	6.55%	10.08%	6.82%
AB Retirement Fund 2050-2052 (ABF)	119,894,389.81	30/09/2012	14.36%	6.39%	13.16%	6.55%	10.08%	6.82%
AB Retirement Fund 2053-2055 (ABF)	107,418,632.19	30/09/2012	14.36%	6.39%	13.16%	6.55%	10.08%	6.82%
AB Retirement Fund 2056-2058 (ABF)	80,603,908.67	30/09/2012	14.36%	6.39%	13.16%	6.55%	10.07%	6.82%
AB Retirement Fund 2059-2061 (ABF)	47,677,305.28	30/09/2012	14.36%	6.39%	13.16%	6.55%	10.07%	6.82%
AB Retirement Fund 2062-2064 (ABF)	25,914,863.89	31/10/2012	14.36%	6.39%	13.16%	6.55%	10.14%	6.82%
AB Retirement Fund 2065-2067 (ABF)	10,718,181.28	28/02/2013	14.36%	6.39%	13.16%	6.55%	9.33%	6.82%
AB Retirement Fund 2068-2070 (ABF)	1,876,332.85	28/02/2013	14.36%	6.39%	13.16%	6.55%	9.34%	6.82%
AB Retirement Fund 2071-2073 (ABF)	285,539.18	28/02/2013	14.36%	6.39%	13.15%	6.55%	9.42%	6.82%
AB Retirement Fund 2074-2076 (ABF)	1,883.88	31/12/2024	14.46%	6.39%	-	-	7.88%	6.26%

Returns are as at 31 March 2026 as this is the closest available date to 5 April 2026.

All Target Date Fund performance is net of fees at 0.18% per annum annual management charge plus additional fund expenses.

The benchmark is CPI plus the outperformance expectation set at the point of inception of the TDF funds.

As funds approach their target date their performance will more closely match the performance of annuities + cash, reflecting the fund manager's investment objectives. For this reason, the performance of annuities and cash is a more appropriate benchmark for funds within 10 years of their target date.

Signed for and on behalf of Associated British Foods Pension Trustees Limited



Director

17 September 2026



Director

17 September 2026

ASSOCIATED BRITISH FOODS PENSION SCHEME

STATEMENT OF TRUSTEE RESPONSIBILITIES

The financial statements, which are prepared in accordance with UK Generally Accepted Accounting Practice, including the Financial Reporting Standard applicable in the UK (FRS 102) are the responsibility of the Trustee. Pension scheme regulations require, and the Trustee is responsible for ensuring, that those financial statements:

- show a true and fair view of the financial transactions of the Scheme during the Scheme year and of the amount and disposition at the end of the Scheme year of its assets and liabilities, other than liabilities to pay pensions and benefits after the end of the Scheme year; and
- contain the information specified in Regulation 3A of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, including making a statement whether the financial statements have been prepared in accordance with the relevant financial reporting framework applicable to occupational pension schemes.

In discharging the above responsibilities, the Trustee is responsible for selecting suitable accounting policies, to be applied consistently, making any estimates and judgements on a prudent and reasonable basis, and for the preparation of the financial statements on a going concern basis unless it is inappropriate to presume that the Scheme will not be wound up.

The Trustee is also responsible for making available certain other information about the Scheme in the form of an annual report.

The Trustee also has a general responsibility for ensuring that adequate accounting records are kept and for taking such steps as are reasonably open to it to safeguard the assets of the Scheme and to prevent and detect fraud and other irregularities, including the maintenance of an appropriate system of internal control.

The Trustee is responsible under pensions legislation for preparing, maintaining and from time to time reviewing and if necessary revising a schedule of contributions showing the rates of contributions payable towards the Scheme by or on behalf of the Employer and the active members of the Scheme and the dates on or before which such contributions are to be paid. The Trustee is also responsible for keeping records in respect of contributions received in respect of any active member of the Scheme and for adopting risk-based processes to monitor whether contributions are made to the Scheme by the Employer in accordance with the schedule of contributions. Where breaches of the schedule occur, the Trustee is required by the Pensions Acts 1995 and 2004 to consider making reports to The Pensions Regulator and the members.

ASSOCIATED BRITISH FOODS PENSION SCHEME

INDEPENDENT AUDITOR'S REPORT TO THE TRUSTEE OF THE ASSOCIATED BRITISH FOODS PENSION SCHEME

Opinion

We have audited the financial statements of the Associated British Foods Pension Scheme for the year ended 5 April 2026 which comprise the Fund Account, the Statement of Net Assets available for benefits and the related notes 1 to 28, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including FRS 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland' (United Kingdom Generally Accepted Accounting Practice).

In our opinion, the financial statements:

- give a true and fair view of the financial transactions of the Scheme during the year ended 5 April 2026, and of the amount and disposition at that date of its assets and liabilities, other than liabilities to pay pensions and benefits after the end of the year;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- contain the information specified in Regulation 3A of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, made under the Pensions Act 1995.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report. We are independent of the Scheme in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

In auditing the financial statements, we have concluded that the Trustee's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Scheme's ability to continue as a going concern for a period of 12 months from when the Scheme's financial statements are authorised for issue.

Our responsibilities and the responsibilities of the Trustee with respect to going concern are described in the relevant sections of this report. However, because not all future events or conditions can be predicted, this statement is not a guarantee as to the Scheme's ability to continue as a going concern.

Other information

The other information comprises the information included in the annual report, other than the financial statements, our auditor's report thereon and our auditor's statement about contributions. The Trustee is responsible for the other information contained within the annual report.

Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in this report, we do not express any form of assurance conclusion thereon.

Our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the course of the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work we have performed, we conclude that there is a material misstatement of the other information, we are required to report that fact.

We have nothing to report in this regard.

ASSOCIATED BRITISH FOODS PENSION SCHEME

INDEPENDENT AUDITOR'S REPORT TO THE TRUSTEE OF THE ASSOCIATED BRITISH FOODS PENSION SCHEME (continued)

Responsibilities of the Trustee

As explained more fully in the Trustee's responsibilities statement set out on page 17, the Trustee is responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the Trustee determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements the Trustee is responsible for assessing the Scheme's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Trustee either intends to wind up the Scheme or to cease operations, or has no realistic alternative but to do so.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Explanation as to what extent the audit was considered capable of detecting irregularities, including fraud

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect irregularities, including fraud. The risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error, as fraud may involve deliberate concealment by, for example, forgery or intentional misrepresentations, or through collusion. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below. However, the primary responsibility for the prevention and detection of fraud rests with the Trustee.

Our approach was as follows:

- We obtained an understanding of the legal and regulatory frameworks that are applicable to the Scheme and determined that the most significant related to pensions legislation and the financial reporting framework. These are the relevant sections of the Pensions Act 1995 and 2004 (and regulations made thereunder), FRS 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland' and the Statement of Recommended Practice (Financial Reports of Pension Schemes). We considered the extent to which a material misstatement of the financial statements might arise as a result of non-compliance.
- We understood how the Scheme is complying with these legal and regulatory frameworks by making enquiries of the Trustee. We corroborated our enquiries through our review of the Trustee's meeting minutes.
- We assessed the susceptibility of the Scheme's financial statements to material misstatement, including how fraud might occur by considering the key risks impacting the financial statements and documenting the controls that the Scheme has established to address risks identified, or that otherwise seek to prevent, deter or detect fraud. Where this risk was considered to be higher, we performed audit procedures to address each identified fraud risk. In our assessment, we also considered the risk of management override of controls. Our audit procedures included verifying cash balances and investment balances to independent confirmations, testing manual journals on a sample basis and also those journals where there is an increased risk of override, and an assessment of segregation of duties. These procedures were designed to provide reasonable assurance that the financial statements were free from fraud or error.
- Based on this understanding, we designed our audit procedures to identify non-compliance with such laws and regulations. Our procedures involved making enquiries of the Trustee for its awareness of any non-compliance of laws or regulations, inspecting correspondence with the Pensions Regulator and review of Trustee's minutes.
- The Scheme is required to comply with UK pensions regulations. As such, we have considered the experience and expertise of the engagement team including the use of specialists where appropriate, to ensure that the team had an appropriate understanding of the relevant pensions regulations to assess the control environment and consider compliance of the Scheme with these regulations as part of our audit procedures.

ASSOCIATED BRITISH FOODS PENSION SCHEME

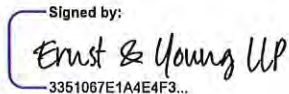
INDEPENDENT AUDITOR'S REPORT TO THE TRUSTEE OF THE ASSOCIATED BRITISH FOODS PENSION SCHEME (continued)

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at <https://www.frc.org.uk/auditorsresponsibilities>. This description forms part of our auditor's report.

Use of our report

This report is made solely to the Scheme's Trustee, as a body, in accordance with the Pensions Act 1995 and Regulations made thereunder. Our audit work has been undertaken so that we might state to the Scheme's Trustee those matters we are required to state to it in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Scheme's Trustee as a body, for our audit work, for this report, or for the opinions we have formed.

Signed by:


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Ernst & Young LLP

Statutory Auditor

Glasgow

Date: 18 September 2026

ASSOCIATED BRITISH FOODS PENSION SCHEME

FUND ACCOUNT

For the year ended 5 April 2026

		DB 2026 £000s	DC 2026 £000s	Total 2026 £000s	DB 2025 £000s	DC 2025 £000s	Total 2025 £000s
Contributions and Benefits							
Employer contributions		262	-	262	-	-	-
Employee contributions		4,675	51,438	56,113	4,767	46,007	50,774
Total contributions	3	4,937	51,438	56,375	4,767	46,007	50,774
Transfers In	4	-	1,629	1,629	12	2,286	2,298
		4,937	53,067	58,004	4,779	48,293	53,072
Benefits paid and payable	5	(139,058)	(18,721)	(157,779)	(128,502)	(18,389)	(146,891)
Payments to and on account of leavers	6	(943)	(33,551)	(34,494)	(1,573)	(34,904)	(36,477)
Administrative expenses	7	(10,973)	-	(10,973)	(6,992)	-	(6,992)
		(150,974)	(52,272)	(203,246)	(137,067)	(53,293)	(190,360)
Net (withdrawals)/additions from dealing with members		(146,037)	795	(145,242)	(132,288)	(5,000)	(137,288)
Returns on investments							
Investment income	8	136,865	-	136,865	154,142	-	154,142
Taxation	9	(637)	-	(637)	(891)	-	(891)
Investment management expenses	10	(19,559)	-	(19,559)	(21,451)	-	(21,451)
Change in market value of investments	11	216,843	194,191	411,034	(180,016)	31,634	(148,382)
Net returns on investments		333,512	194,191	527,703	(48,216)	31,634	(16,582)
Net increase/(decrease) during the year		187,475	194,986	382,461	(180,504)	26,634	(153,870)
Net assets of the Scheme at the beginning of the year		3,489,605	1,107,674	4,597,279	3,718,421	1,032,728	4,751,149
Transfer between sections		(49,689)	49,689	-	(48,312)	48,312	-
Net assets of the Scheme at the end of the year		<u>3,627,391</u>	<u>1,352,349</u>	<u>4,979,740</u>	<u>3,489,605</u>	<u>1,107,674</u>	<u>4,597,279</u>

Transfers between sections are further detailed in note 28 on page 43.

The notes on pages 23 to 43 form part of these financial statements.

ASSOCIATED BRITISH FOODS PENSION SCHEME

STATEMENT OF NET ASSETS AVAILABLE FOR BENEFITS **At 5 April 2026**

		DB 2026 £000s	DC 2026 £000s	Total 2026 £000s	DB 2025 £000s	DC 2025 £000s	Total 2025 £000s
Investment assets:							
Equities	11	494,403	-	494,403	642,943	-	642,943
Fixed Income	11	2,881,033	-	2,881,033	2,126,467	-	2,126,467
Pooled investment vehicles	12	1,374,478	1,347,940	2,722,418	1,329,163	1,106,149	2,435,312
Derivatives	15	391,721	-	391,721	374,693	-	374,693
Properties	19	38,462	-	38,462	125,192	-	125,192
AVC investments	17	11,579	-	11,579	11,651	-	11,651
Cash		110,860	-	110,860	277,517	-	277,517
Other investment balances	13	32,537	-	32,537	100,696	-	100,696
Amounts receivable under reverse repurchase agreements		94,329	-	94,329	132,820	-	132,820
		<u>5,429,402</u>	<u>1,347,940</u>	<u>6,777,342</u>	<u>5,121,142</u>	<u>1,106,149</u>	<u>6,227,291</u>
Investment liabilities:							
Derivatives	15	(266,195)	-	(266,195)	(279,786)	-	(279,786)
Other investment balances	14	(16,420)	-	(16,420)	(117,194)	-	(117,194)
Amounts due under repurchase agreements		<u>(1,530,154)</u>	<u>-</u>	<u>(1,530,154)</u>	<u>(1,236,539)</u>	<u>-</u>	<u>(1,236,539)</u>
		<u>(1,812,769)</u>	<u>-</u>	<u>(1,812,769)</u>	<u>(1,633,519)</u>	<u>-</u>	<u>(1,633,519)</u>
Total net investments	11	3,616,633	1,347,940	4,964,573	3,487,623	1,106,149	4,593,772
Current assets	21	34,866	5,301	40,167	18,346	2,085	20,431
Current liabilities	22	(24,108)	(892)	(25,000)	(16,364)	(560)	(16,924)
Net assets of the Scheme at the end of the year		<u>3,627,391</u>	<u>1,352,349</u>	<u>4,979,740</u>	<u>3,489,605</u>	<u>1,107,674</u>	<u>4,597,279</u>

The notes on pages 23 to 43 form part of these financial statements.

The financial statements summarise the transactions of the Scheme and deal with the net assets at the disposal of the Trustee. They do not take account of obligations to pay pensions and other benefits which fall due after the end of the Scheme year. The actuarial position of the Scheme, which does take account of such obligations, is dealt with in the Report on Actuarial Liabilities on page 47 of the annual report and these financial statements should be read in conjunction with this Report.

Signed for and on behalf of the Associated British Foods Pension Trustees Limited

17 September 2026
Director

17 September 2026
Director

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS

1. Basis of preparation

The financial statements have been prepared in accordance with the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, Financial Reporting Standard 102 (FRS 102) – The Financial Reporting Standard applicable in the UK and Republic of Ireland, and the guidance set out in the Statement of Recommended Practice (Financial Reports of Pension Schemes) (SORP) (Revised 2018).

The Scheme has been established as a Trust under English Law.

The Scheme's functional and presentation currency is pounds Sterling.

2. Accounting policies

Valuation of investments

- i) Investments are included at fair value.
- ii) UK and foreign securities quoted on a recognised exchange are included in the Statement of Net Assets at their bid price or official closing prices at the Scheme year end.
- iii) Accrued interest is excluded from the market values of fixed interest and index-linked securities (which are thereby stated at "clean bid" prices).
- iv) Unquoted securities are included at fair value estimated by the Trustee based on professional advice.
- v) Pooled investment vehicles are stated at bid price for funds with bid/offer spreads. The Scheme's pooled investment vehicles are not traded on an active market. Where there are no bid/offer spreads offered by the fund manager the single price or Net Asset Value of the investment is quoted by the fund manager.
- vi) Private debt funds are stated at the latest available cashflow adjusted valuations prepared in accordance with International Private Equity and Venture Capital ('IPEV') Guidelines.
- vii) Properties are included at open market value at the Scheme year end. The properties are revalued annually at 31 March in accordance with the Royal Institution of Chartered Surveyors' Appraisal and Valuation Standards and the Practice Statement contained therein by CB Richard Ellis Limited, an independent qualified firm of chartered surveyors. The Trustee considers that the valuation at 31 March is an acceptable estimate of the open market value at the Scheme year end.
- viii) Derivatives are stated at fair value. Exchange traded derivatives are stated at fair values determined using market quoted prices. For exchange traded derivative contracts which are assets, market value is based on quoted bid prices. For exchange traded derivative contracts which are liabilities, market value is based on quoted offer prices. Over the counter (OTC) derivatives are stated at fair value using pricing models and relevant market data at 5 April. Forward foreign exchange contracts are valued at the difference between the contract price and the price that would be required to close the contract at 5 April. All gains and losses arising on derivative contracts are reported within "change in market value".
- ix) Where a fund manager enters into a repurchase "repo" contract i.e. they have agreed to sell a security and agreed to repurchase at an agreed price/date sometime in the future, the obligation to repurchase the security is recognised in the financial statements by recognising the security within investments and the obligation to repurchase the security within investment liabilities. Where synthetic repurchase agreements are used the cash received is recognised and the obligation to settle is recognised in investment liabilities.

With reverse repurchase agreements, securities received as collateral are not recognised in the financial statements, cash delivered to the counterparty is recognised as a receivable in the financial statements.

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

2. Accounting policies (continued)

- x) Swap collateral is pledged to and received from counterparty banks. Collateral pledged is accounted for within the net assets of the Scheme, whereas collateral received does not form part of the Scheme net assets, as referred to in note 16 on page 32.
- xi) The change in market value of investments during the year comprises all increases and decreases in the market value of investments held at any time during the year, including profits and losses realised on sales of investments during the year.

Investment income

- i) Dividends from quoted securities are accounted for when the security is declared ex-dividend.
- ii) Income from fixed income is accounted for on an accruals basis and includes income bought and sold on purchases and sales of fixed income.
- iii) Receipts or payments under swap contracts which represent the difference between swapped cash flows, are included in investment income.
- iv) Rents are earned in accordance with the terms of the lease.
- v) Interest is accrued on a daily basis up to the Scheme year end or the 31 March.
- vi) Investment income is reported net of attributable tax credits but gross of withholding taxes which are accrued in line with the associated investment income. Irrecoverable withholding taxes are reported separately as a tax charge.
- vii) In general, investment income is accounted for on an accruals basis for the Pooled Investment Vehicles. It is not distributed but reinvested within the Pooled Investment Vehicles and so reflected in the unit price and accordingly within the change in market value of the investments. The exceptions are:
 - i. the Scheme invests in a property unit trust which distributes rental income and management fee rebates from time to time, which is accounted for on an accruals basis at the point when the rebate is notified.
 - ii. the Scheme holds various private debt funds which distribute income. This is accounted for on an accruals basis when the distribution is declared.

Foreign currencies

Items denominated in foreign currencies are translated at the rate ruling at the Scheme year end. Transactions executed in foreign currencies are translated at the rate ruling at the date of the transaction. Differences arising on investment balance translation are accounted for in the change in market value of investments during the year.

Contributions

- i) Employer normal and employer other contributions are accounted for as at the pay period to which they relate. With effect from 1 October 2023 the Trustee and employer agreed to a contribution abatement as disclosed on page 7 of the Trustee report. As a result, no employer contributions are paid to the Scheme whilst the funding level remains above 110%.
- ii) Employer augmentation contributions are accounted for in accordance with the agreement under which they are paid.
- iii) In respect of DB normal contributions, the employer made a payment each month in excess of the total contributions deducted from members' pay, and this payment was accounted for on receipt. A running record is kept of the contributions surplus, and this is accounted for as prepaid contributions and disclosed in note 22.

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

2. Accounting policies (continued)

- iv) In respect of DB member contributions including AVCs, members' actual contributions are recorded as at the date of deduction from pay. For DC member contributions including AVCs, they are accounted for as at the pay period to which they relate.

Expenses

- i) Expenses are accounted for on an accruals basis.

Payments to or on behalf of members

- i) Benefits, and any associated tax liabilities, are accounted for in the period in which they fall due. Where the member has a choice, benefits are accounted for at the date at which the member notifies the Trustee of his/her decision on the type or amount of benefits to be taken, or if there is no member choice, on the date of retirement or leaving.
- ii) Opt outs are accounted for when the Scheme is notified of the opt out.
- iii) Individual transfers in or out of the Scheme are accounted for when member liability is accepted or discharged, which is normally when the transfer amount is received or paid.

	DB	DC	Total	DB	DC	Total
	2026	2026	2026	2025	2025	2025
	£'000	£'000	£'000	£'000	£'000	£'000

Contributions receivable

Employer - augmentation

	262	-	262	-	-	-
Employee contributions						
Member - normal	3,433	43,609	47,042	3,759	40,165	43,924
Member - AVCs	1,242	7,829	9,071	1,008	5,842	6,850
	<u>4,675</u>	<u>51,438</u>	<u>56,113</u>	<u>4,767</u>	<u>46,007</u>	<u>50,774</u>
	<u>4,937</u>	<u>51,438</u>	<u>56,375</u>	<u>4,767</u>	<u>46,007</u>	<u>50,774</u>

Up to 30 September 2023, the employer paid other DB contributions to cover the Scheme's payments in respect of DC Section administrative expenses, the Pension Protection Fund levy and to fund life cover for members of the DC Section. As per page 7, a contribution abatement was put in place from 1 October 2023. This abatement is outlined in the Schedule of Contributions and is subject to certain funding triggers, which will cause the abatement to be ceased if they are no longer met.

As disclosed on page 7, no further employer contributions have been payable since 1 October 2023, except in respect of augmentation contributions. From 1 October 2023 additional transfers took place from the DB Section to the DC Section in order to replace the value of DC employer contributions which ceased as part of the contribution abatement.

4. Transfers in

Individual transfers in

	-	1,629	1,629	12	2,286	2,298
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The transfers into the DB Section relate to members transferring their Final salary AVCs into the AVC arrangements within the Scheme.

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

5.	DB 2026 £'000	DC 2026 £'000	Total 2026 £'000	DB 2025 £'000	DC 2025 £'000	Total 2025 £'000
Benefits paid and payable						
Pensions	119,787	-	119,787	112,142	-	112,142
Commutation of pensions and lump sum retirement benefits	18,868	8,623	27,491	15,507	10,199	25,706
Purchase of annuities	-	5,080	5,080	-	4,881	4,881
Lump sum death benefits	380	4,886	5,266	710	3,167	3,877
Taxation where lifetime or annual allowance exceeded	23	132	155	143	142	285
	139,058	18,721	157,779	128,502	18,389	146,891

Pensions in 2026 increased as they included uplifts for GMP equalisation as mentioned in the Trustee's report on page 6.

6.	Payments to and on account of leavers					
Refunds to members leaving service	-	15	15	-	25	25
Opt outs	-	143	143	-	45	45
Individual transfers to other schemes	455	33,124	33,579	764	34,569	35,333
Transfers of pension credit on divorce	488	269	757	809	265	1,074
	943	33,551	34,494	1,573	34,904	36,477

7.	Administrative expenses					
Administration and processing	6,996	-	6,996	6,170	-	6,170
Actuarial fees	433	-	433	283	-	283
Audit fees	144	-	144	165	-	165
Legal and other professional fees	3,129	-	3,129	127	-	127
Pension Protection Fund Levies	322	-	322	299	-	299
Recovery of expenses	(51)	-	(51)	(52)	-	(52)
	10,973	-	10,973	6,992	-	6,992

All administrative expenses for the DC Section are borne by the DB Section.

Legal and professional fees in 2026 have increased back to normal levels. The value in 2025 was significantly reduced due to reimbursement of project costs from suppliers.

Recovery of expenses relates to member charges on divorce and transfer out calculations and reimbursement of costs for administrative tasks undertaken for other group schemes as detailed in note 24 on page 41.

8.	Investment income					
Income and dividends from:						
fixed income	113,738	-	113,738	82,106	-	82,106
equities	11,132	-	11,132	19,264	-	19,264
pooled investment vehicles	50,933	-	50,933	58,827	-	58,827
repurchase agreements	(56,013)	-	(56,013)	(48,220)	-	(48,220)
derivatives	5,047	-	5,047	19,946	-	19,946
Net rent from properties	4,119	-	4,119	12,210	-	12,210
Interest on cash deposits	45	-	45	61	-	61
Other income	7,864	-	7,864	9,948	-	9,948
	136,865	-	136,865	154,142	-	154,142

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

9. Taxation

The Scheme is a registered Pension Scheme under Chapter 2 of Part 4 of the Finance Act 2004 and is therefore exempt from income tax and capital gains tax. The tax charge in the Fund Account represents irrecoverable withholding taxes arising on investment income.

10. <u>Investment management expenses</u>	DB 2026 £'000	DC 2026 £'000	Total 2026 £'000	DB 2025 £'000	DC 2025 £'000	Total 2025 £'000
Administration, management and custody	15,599	-	15,599	18,552	-	18,552
Performance measurement services	80	-	80	93	-	93
Other advisory fees	3,880	-	3,880	2,806	-	2,806
	<u>19,559</u>	<u>-</u>	<u>19,559</u>	<u>21,451</u>	<u>-</u>	<u>21,451</u>

Administration, management and custody fees were higher in 2025 due to higher performance related fees.

11. Reconciliation of Investments

	Note	Value at 06 Apr 2025 £000s	Purchase at cost and derivative payments £000s	Sales proceeds and derivative receipts £000s	Change in market value £000s	Value at 05 Apr 2026 £000s
<u>DB Section</u>						
Fixed income		2,126,467	2,294,841	(1,501,074)	(39,201)	2,881,033
Equities		642,943	718,787	(1,010,038)	142,711	494,403
Pooled investment vehicles	12	1,329,163	358,442	(393,903)	80,776	1,374,478
Derivative contracts	15	94,907	149,998	(153,565)	34,186	125,526
Property		125,192	865	(81,420)	(6,175)	38,462
AVC investments	17	11,651	1,242	(2,209)	895	11,579
		<u>4,330,323</u>	<u>3,524,175</u>	<u>(3,142,209)</u>	<u>213,192</u>	<u>4,925,481</u>
Cash		277,517			2,242	110,860
Other investment balances		(16,498)			540	16,117
Repurchase agreements		<u>(1,103,719)</u>			<u>869</u>	<u>(1,435,825)</u>
		<u>3,487,623</u>			<u>216,843</u>	<u>3,616,633</u>

The value of securities sold under repurchase agreements was £1,323.9m (2025 £870.5m).

DC Section

Pooled investment vehicles	12	<u>1,106,149</u>	<u>109,438</u>	<u>(61,838)</u>	<u>194,191</u>	<u>1,347,940</u>
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DC Section investments are all allocated to members.

DC Section investments are allocated to provide benefits to individuals on whose behalf corresponding contributions are paid. The investment manager holds the investment units on a pooled basis for the Trustee, and the Scheme administrator allocates investment units to members.

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

Transaction Costs

Transaction costs are included in the cost of purchases and deducted from sales proceeds. Direct transaction costs include costs charge to the Scheme such as fees, commission and stamp duty.

Transaction costs analysed by main asset class and type of cost are as follows:

	Fees & Taxes £000s	Commission £000s	2026 Total £000s	2025 Total £000s
Fixed income	76	-	76	-
Equities	426	581	1,007	555
Pooled Funds	-	-	-	-
Derivatives	62	-	62	51
	<u>564</u>	<u>581</u>	<u>1,145</u>	<u>606</u>
2025	<u>331</u>	<u>275</u>	<u>-</u>	<u>606</u>

In addition to the transaction costs disclosed above, indirect costs are incurred through the bid-offer spread on investments within pooled investment vehicles and charges made within those vehicles.

12.	<u>Details of pooled investment assets held at year end</u>	2026 £000s	2025 £000s
	DB Section		
	Equity Funds	229,723	167,008
	Overseas Hedge Fund	-	41
	Fixed Interest Funds	10,023	-
	Private debt	767,591	856,407
	Multi Asset Credit	367,141	305,707
		<u>1,374,478</u>	<u>1,329,163</u>
	DC Section		
	The underlying assets within the Target dated funds were:		
	Equity funds	1,161,428	931,215
	Bond funds	158,860	163,273
	The self-select funds available to members are invested in similar asset classes.	1,320,288	1,094,488
	The value of these funds are as follows		
	Tier 2 -4 Self-select funds	27,652	11,661
		<u>1,347,940</u>	<u>1,106,149</u>
13	<u>Details of other investment balances - assets</u>		
	DB Section		
	Pending trades	8,405	85,786
	Cash collateral	10,162	8,750
	Outstanding dividends and recoverable withholding tax	13,970	6,160
		<u>32,537</u>	<u>100,696</u>

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

14	<u>Details of other investment balances - liabilities</u>	2026 £000s	2025 £000s
	DB Section		
	Pending trades	14,260	116,625
	Cash collateral	2,160	569
		<u>16,420</u>	<u>117,194</u>
	Total other investment balances	<u>16,117</u>	<u>(16,498)</u>

15. Derivatives

The Trustee has authorised the use of derivatives by their investment managers as part of their investment strategy for the Scheme as follows:

Futures – the Trustee did not want cash held to be ‘out of the market’ and therefore bought exchange traded index-based futures contracts which had an economic value broadly equivalent to cash held.

Options – the Trustee’s aim is to match as far as possible the Liability Driven Investment (LDI) portfolio and the Scheme’s long-term liabilities, in particular in relation to their sensitivities to market prices. The Trustee has entered into OTC options that extend the duration of the fixed income portfolio to better match the long-term liabilities of the Scheme.

Swaps – the Trustee’s aim is to match as far as possible the Liability Driven Investment (LDI) portfolio and the Scheme’s long-term liabilities, in particular in relation to their sensitivities to interest rate movements. The Trustee had entered into OTC interest rate swaps that extend the duration of the fixed income portfolio to better match the long-term liabilities of the Scheme.

Forward FX – to maintain appropriate diversification of investments within the portfolio and take advantage of overseas investment returns, a proportion of the underlying investment portfolio is invested overseas. To balance the risk of investing in foreign currencies whilst having an obligation to settle benefits in GBP, a currency hedging programme, using forward FX contracts, has been put in place to reduce the currency exposure of these overseas investments to the targeted level.

	Net asset / (liability) £000s	Derivative asset £000s	Derivative liability £000s
2026			
Futures	70	843	(773)
Options	4,401	4,401	-
Swaps	134,825	380,093	(245,268)
Forward FX	(13,770)	6,384	(20,154)
As at 5 April 2026	<u>125,526</u>	<u>391,721</u>	<u>(266,195)</u>
	Net asset / (liability) £000s	Derivative asset £000s	Derivative liability £000s
2025			
Futures	-	-	-
Options	4,947	4,947	-
Swaps	79,032	349,951	(270,919)
Forward FX	10,928	19,795	(8,867)
As at 5 April 2025	<u>94,907</u>	<u>374,693</u>	<u>(279,786)</u>

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

15. Derivatives (continued)

Futures

Type of Contract	Expiration	Economic exposure value	Aggregate Asset £000s	Aggregate Liability £000s
UK Fixed Income Futures	less than 3 months	2,749	-	(127)
Overseas Fixed Income Futures	less than 3 months	(5,715)	843	(646)
As at 5 April 2026		(2,966)	843	(773)

As at 5 April 2025

-

Options

	Expiration	Notional Principal £000s	Aggregate Asset £000s	Aggregate Liability £000s
Overseas Put Options	more than 3 months	-	1,807	-
Overseas Put Options	less than 3 months	-	2,594	-
As at 5 April 2026		-	4,401	-

As at 5 April 2025

-

Swaps

Type of contract	Expires	Notional principal £000s	Aggregate Asset £000s	Aggregate Liability £000s
Interest Rate Swaps	2026-2074	3,237,453	259,933	(211,076)
Inflation Swaps	2026-2071	1,376,802	110,918	(25,932)
Other Swaps	2034	28,686	8,518	(8,260)
Total Return Swaps	2050	724	724	-
As at 5 April 2026			380,093	(245,268)

As at 5 April 2025

349,951

(270,919)

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

15. Derivatives (continued)

Forward FX

Number of contracts	Currency Bought	Currency Sold	Aggregate asset £000s	Aggregate liability £000s
14	EUR 238,150	GBP (206,157)	1,591	(1)
6	EUR 4,981	USD (5,801)	3	(35)
13	GBP 727,325	EUR (832,841)	1,732	(2,417)
3	GBP 11,014	JPY (2,300,810)	65	(7)
15	GBP 53,949	OTHER (88,354)	257	(310)
31	GBP 1,134,043	USD (1,524,495)	144	(17,245)
1	JPY 305,950	GBP (1,452)	-	(1)
4	OTHER 37,299	GBP (20,293)	-	(105)
5	USD 26,780	EUR (22,865)	237	-
20	USD 292,423	GBP (218,479)	2,355	(33)
As at 5 April 2026	<u>2,831,914</u>	<u>(5,221,547)</u>	<u>6,384</u>	<u>(20,154)</u>
As at 5 April 2025			<u>19,795</u>	<u>(8,867)</u>

Forward FX and Interest Rate Swaps derivatives are being used to generate additional return by exploiting short term pricing differences, by obtaining exposure to specific markets without having to purchase specific investments or to eliminate short term risk. Inflation Swap and Interest Rate Swap derivatives are being used to provide the Scheme with longer term protection against changes in inflation and interest rates that are not correlated with the underlying assets held in the Scheme.

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

16. Collateral

	2026 £000s	2025 £000s
Cash Collateral		
Collateral provided to counterparties but remaining within the net assets of the Scheme:		
Cash	3,767	10,132
UK Gilts	49,968	20,841
	<u>53,735</u>	<u>30,973</u>
Collateral received from counterparties which does not form part of the net assets of the Scheme:		
Cash	74,450	40,172
UK Gilts	76,880	72,959
	<u>151,330</u>	<u>113,131</u>
Repurchase Agreement Collateral		
Collateral provided to counterparties but remaining within the net assets of the Scheme:		
Cash	765	-
UK Gilts	37,160	51,478
	<u>37,925</u>	<u>51,478</u>
Collateral received from counterparties which does not form part of the net assets of the Scheme:		
Cash	-	694
UK Gilts	1,572	1,068
	<u>1,572</u>	<u>1,762</u>
17	2026 £000s	2025 £000s
<u>DB section AVC investments</u>		
Mobius Life	<u>11,579</u>	<u>11,651</u>

The Trustee holds DB members' AVC investments which are invested in money purchase type arrangements with the above company and which are separate from the main fund.

AVC investments for DC members are invested with the main DC investments of which £35.9m relate to AVCs (2025: £27.4m).

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

18. Fair value determination

The fair value of financial instruments has been disclosed using the following fair value hierarchy:

- Level 1: The unadjusted quoted price in an active market for identical assets or liabilities that the entity can access at the measurement date.
- Level 2: Inputs other than quoted prices included within Level 1 that are observable (i.e. developed using market data) for the asset or liability, either directly or indirectly.
- Level 3: Inputs are unobservable (i.e. for which market data is unavailable) for the asset or liability.

The Scheme's investment assets and liabilities have been included at fair value using the above hierarchy categories as follows:

	Level 1 £000s	Level 2 £000s	Level 3 £000s	Total £000s
As at 5 April 2026				
DB Section				
Fixed income	-	2,867,464	13,569	2,881,033
Equities	469,572	8,803	16,028	494,403
Pooled investment vehicles	-	228,132	1,146,346	1,374,478
Property	-	-	38,462	38,462
Derivatives	5,195	118,516	1,815	125,526
AVC investments	-	-	11,579	11,579
Cash	110,860	-	-	110,860
Repurchase and reverse repurchase agreements	-	(1,435,825)	-	(1,435,825)
Other investment balances	16,025	68	24	16,117
	601,652	1,787,158	1,227,823	3,616,633
DC Section				
Pooled investment vehicles	-	1,347,940	-	1,347,940
Total	601,652	3,135,098	1,227,823	4,964,573
	Level 1 £000s	Level 2 £000s	Level 3 £000s	Total £000s
As at 5 April 2025				
DB Section				
Fixed income	5,457	2,102,164	18,846	2,126,467
Equities	624,084	2,942	15,917	642,943
Pooled investment vehicles	-	156,702	1,172,461	1,329,163
Property	-	-	125,192	125,192
Derivatives	4,947	89,960	-	94,907
AVC investments	-	-	11,651	11,651
Cash	276,720	-	797	277,517
Repurchase and reverse repurchase agreements	-	(1,103,719)	-	(1,103,719)
Other investment balances	15,365	(31,870)	7	(16,498)
	926,573	1,216,179	1,344,871	3,487,623
DC Section				
Pooled investment vehicles	-	1,106,149	-	1,106,149
Total	926,573	2,322,328	1,344,871	4,593,772

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

19. Property

At the year end the Scheme holds direct property with a value of £38.5m (2025: £125.2m).

The reduction in the value of properties reflects the Trustee's investment strategy as disclosed on page 11. During the year, the Trustee has sold six properties totalling £81.4m. This has reduced the Property Portfolio allocation from 3.61% to 1.06% at the year end.

Since the year end, the Trustee has sold 3 properties with a value of £6.9m.

20. Investment risk disclosures

FRS 102 requires the disclosure of information in relation to certain investment risks. These risks are set out by FRS 102 as follows:

Credit risk: this is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation.

Market risk: this comprises currency risk, interest rate risk and other price risk.

- Currency risk: this is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in foreign exchange rates.
- Interest rate risk: this is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in market interest rates.
- Other price risk: this is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in market prices (other than those arising from interest rate risk or currency risk), whether those changes are caused by factors specific to the individual financial instrument or its issuer, or factors affecting all similar financial instruments traded in the market.

The Trustee determines its investment strategy after consulting with professional advisers. The Scheme has exposure to these risks because of the investments it makes in its investment strategy set out below. The Trustee manages investment risks, including credit risk and market risk, within agreed limits which are set taking into account the Scheme's strategic investment objectives. These investment objectives and risk limits are implemented through the investment management agreements in place with the Scheme's investment managers and monitored by the Trustee by regular reviews of the investment portfolio. Further information on the Trustee's approach to risk management, credit and market risk is set out below. This does not include AVC investments as these are not considered significant in relation to the overall investments of the Scheme.

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

20. Investment risks (continued)

Defined Benefit Section (DB Section)

(i) Investment strategy

The investment objective of the DB Section is to maintain a portfolio of suitable assets of appropriate liquidity which will generate investment returns to meet, together with future contributions, the benefits of the DB Section payable under the Trust Deed and Rules as they fall due.

The Trustee sets the investment strategy for the DB Section taking into account considerations such as strength of the employer covenant, the long-term liabilities of the DB Section and the funding agreement with the Employer. The investment strategy is set out in its Statement of Investment Principles (SIP) attached to the report.

The strategy as at year end agreed by the Trustee in May 2025 is to hold:

- 77.40% in investments that move in line with the long-term liabilities of the DB Section. This is referred to as LDI and comprises UK and overseas government and corporate bonds, repurchase agreements and interest rate swaps, the purpose of which is to hedge against the impact interest rate movement on long term liabilities.
- 20.60% in return seeking investments comprising UK and overseas equities, equities futures, investment property and hedge funds.
- 2.00% in cash held in UK and overseas currencies.

To protect the overseas investments a currency hedge strategy has been established thereby minimising foreign exchange risk.

(ii) Credit risk

The DB Section is subject to credit risk because the Trustee elects to invest in fixed income, OTC derivatives, has cash balances and enters into repurchase and reverse repurchase agreements. The DB Section also invests in pooled investment vehicles and is therefore directly exposed to credit risk in relation to the instruments it holds in the pooled investment vehicles. The DB Section is indirectly exposed to credit risks arising on the financial instruments held by the pooled investment vehicles excluding Equity and Hedge Funds.

	Investment grade	Non-investment grade	Unrated	Total
2026	£000s	£000s	£000s	£000s
Fixed Income	2,542,497	228,202	110,334	2,881,033
OTC Derivatives	-	-	125,526	125,526
Cash	-	-	110,860	110,860
Repurchase agreements	-	-	(1,435,825)	(1,435,825)
Pooled Funds ¹	-	-	1,374,478	1,374,478
	2,542,497	228,202	285,373	3,056,072
2025	£000s	£000s	£000s	£000s
Fixed Income	1,786,460	248,016	91,991	2,126,467
OTC Derivatives	-	-	94,907	94,907
Cash	-	-	277,517	277,517
Repurchase agreements	-	-	(1,103,719)	(1,103,719)
Pooled Funds ¹	-	-	1,329,163	1,329,163
	1,786,460	248,016	689,859	2,724,335

¹Due to their Structure, Pooled Funds are classed as unrated, however the investments held within them will be a combination of investment grade and non-investment grade.

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

20. Investment risks (continued)

Defined Benefit Section (DB Section) (continued)

(ii) Credit risk (continued)

Credit risk arising on bonds held directly is mitigated by predominantly investing in government bonds where credit risk is minimal, or corporate bonds which are rated at least investment grade. Credit risk arising on other investments is mitigated by investment mandates requiring all counterparties to be at least investment grade credit rated. This is the position as at the year end.

Credit risk arising on derivatives depends on whether the derivative is exchange traded or over the counter. OTC derivatives contracts are not guaranteed by any regulated exchange and therefore the DB Section is subject to risk of failure of the counterparty. The credit risk for OTC swaps is reduced by collateral arrangements. Credit risk also arises on forward foreign currency contracts. There are no collateral arrangements for these contracts, but all counterparties are required to be at least investment grade. This is the position at the year end.

Cash is held within financial institutions which are at least investment grade credit rated. This is the position as at the year end.

Credit risk on repurchase agreements is mitigated through collateral arrangements. The amounts due from counterparties in relation to reverse repurchase transactions and the amounts received from counterparties are outlined in note 16.

Direct credit risk arising from pooled investment vehicles is mitigated by the underlying assets of the pooled arrangements being ring-fenced from the pooled managers, the regulatory environments in which the pooled managers operate and diversification of investments amongst a number of pooled arrangements. The Trustee carried out due diligence checks on the appointment of new pooled investment managers and on an ongoing basis monitored any changes to the regulatory and operating environment of the pooled managers.

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

20. Investment risks (continued)

Defined Benefit Section (DB Section) (continued)

(ii) Credit risk (continued)

A summary of pooled investment vehicles by type of arrangement is as follows:

	2026	2025
	£000s	£000s
Open Ended Investment Company	10,023	-
Limited Partnership	769,392	856,448
Irish Qualifying Investor Alternative Fund	367,141	305,707
Authorised Unit Trust	218,109	156,702
Limited Liability Company	9,813	10,306
	<u>1,374,478</u>	<u>1,329,163</u>

(iii) Currency risk

The Scheme was subject to direct currency risk because some of the DB Section's investments are held in overseas markets.

The Scheme is also exposed to indirect currency risk via the underlying holdings in its pooled investment vehicles shown in note 12.

The Trustee has set a benchmark limit to overseas currency exposure which is achieved through a currency hedging policy. This was the net currency exposure at the year end.

	2026	2025
	£000s	£000s
US Dollar	670,248	448,542
Japanese Yen	3,247	3,895
Euro	238,048	117,394
Canadian Dollar	1,224	1,046
Australian Dollar	-	714
Swiss Franc	9,095	8,175
Other	45,356	56,873
	<u>967,218</u>	<u>636,639</u>

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

20. Investment risks (continued)

(iii) Currency risk (continued)

The other currencies are split as follows:

	2026 £000s	2025 £000s
UAE Dirham	-	660
Brazilian Real	-	1,339
Danish Krone	8,349	11,253
Hong Kong Dollar	-	22,259
Korean Won	14,405	1,534
Norwegian Krone	7,911	7,334
Swedish Krona	-	5,147
Thailand Baht	10,735	430
New Taiwan Dollar	3,956	6,917
	<u>45,356</u>	<u>56,873</u>

(iv) Interest rate risk

The DB Section is subject to interest rate risk because some of the DB Section's investments are held in fixed income, interest rate swaps, either as segregated investments or through pooled vehicles and cash. The Trustee has set a benchmark for total investment in fixed income and interest rate swaps of 16.5% of the total investment portfolio, as part of their LDI investment strategy. Under this strategy, if interest rates fall, the value of the LDI investments will rise to help match the increase in actuarial liabilities arising from a fall in the discount rate. Similarly, if interest rates rise, the LDI investments will fall in value, as will the actuarial liabilities because of an increase in the discount rate. At the year end the LDI portfolio represented 14.42% of the total investment portfolio (2025: 14.69%).

	2026 £000s	2025 £000s
Direct		
Fixed income	2,881,033	2,126,467
Swaps	134,825	79,032
	<u>3,015,858</u>	<u>2,205,499</u>

The Scheme is also exposed to indirect interest rate risk via the underlying holdings in its pooled investment vehicles excluding Equity and Hedge Funds shown in note 12.

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

20. Investment risks (continued)

(v) Other price risk

Other price risk arises principally in relation to the Scheme's return seeking portfolio which includes directly held equities, equities held in pooled vehicles, equity options and investment properties. The Scheme has set a target asset allocation of 20.6% of investments being held in return seeking investments. The actual position at the year end is shown on page 12.

The Scheme manages this exposure to overall price movements by constructing a diverse portfolio of investments across various markets.

	2026 £000s	2025 £000s
Direct		
Equities	494,403	642,943
Equity Options	4,401	4,947
Property	38,462	125,192
	<u>537,266</u>	<u>773,082</u>
Indirect		
Equity Pooled Funds	<u>229,723</u>	<u>167,008</u>

Defined Contribution Section (DC Section)

(i) Investment strategy

The Trustee's objective is to make available to members of the Scheme an appropriate range of investment options designed to generate income and capital growth, which together with new contributions from members and the employer, will provide a retirement amount with which the member can purchase a pension annuity (or other type of pension product). The SIP outlines the investment objectives and strategy for the DC Section assets of the Scheme.

As disclosed in detail in the Investment Report on page 14, the Trustee offers the members Target Date Funds and tier 2-4 Self Select Funds.

The investment funds offered to members are white label funds provided by AllianceBernstein as follows:

- Equity
- Bonds
- Cash
- Diversified Growth

Due to the value of the self-select funds in comparison to the value of the Target Date Funds, the risk disclosures primarily concentrate on the risks associated with the Target Date Funds.

The Trustee has an investment management agreement in place with AllianceBernstein that sets out guidelines for the underlying investments held by the funds. The day-to-day management of the underlying investments is the responsibility of Mobius Life, including the direct management of credit and market risks.

The Trustee monitors the underlying risks by quarterly investment reviews with AllianceBernstein.

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

20. Investment risks

(ii) Credit risk

The DC Section is subject to direct credit risk in relation to AllianceBernstein through its holding in unit linked insurance funds provided by AllianceBernstein.

AllianceBernstein is regulated by the Financial Conduct Authority and maintains separate funds for its policy holders. The Trustee monitors the creditworthiness of AllianceBernstein by reviewing published credit ratings. AllianceBernstein invests all the Scheme's funds in its own investment linked funds, and it does not use other investment funds or reinsurance arrangements. In the event of default by AllianceBernstein the Scheme is protected by the Financial Services Compensation Scheme.

The DC Section is also subject to indirect credit and market risk arising from the underlying investments held in the white label funds. Member level risk exposures will be dependent on the funds invested in by members.

At the Scheme year end the bond funds per note 12 were exposed to underlying credit risk.

A summary of pooled investment vehicles by type of arrangement is as follows:

	2026 £000s	2025 £000s
Unit Linked Insurance Policy	1,347,940	1,106,149

(iii) Market risk

The Scheme's DC Section is subject to indirect currency, interest rate and other price risk arising from the underlying financial instruments held in the funds managed by AllianceBernstein.

The Equity Fund element of the Target Date Funds per note 12 is exposed to currency risk and other price risks.

The Bond Fund element of the Target Date Funds per note 12 is exposed to currency risk and interest rate risk.

21	DB 2026 £000s	DC 2026 £000s	Total 2026 £000s	DB 2025 £000s	DC 2025 £000s	Total 2025 £000s
<u>Current assets</u>						
Prepayments	7,817	-	7,817	7,750	-	7,750
Recoverable VAT	15,200	-	15,200	172	-	172
Rent due from tenants	2,224	-	2,224	2,236	-	2,236
Other debtors	50	-	50	49	-	49
Cash at bank	9,575	5,301	14,876	8,139	2,085	10,224
	<u>34,866</u>	<u>5,301</u>	<u>40,167</u>	<u>18,346</u>	<u>2,085</u>	<u>20,431</u>

Prepayments for 2026 and 2025 are comprised of pension payroll, administrative costs and computer licence fees paid in advance.

Recoverable VAT for 2026 increased due to HMRC legislative changes on reclaiming VAT on Investment Management Fees. The Trustee filed a retrospective claim for prior years with HMRC.

DC cash at bank is allocated to members and the Trustee as follows:

	2026 £000s	2025 £000s
Members	5,291	2,067
Trustee	10	18
	<u>5,301</u>	<u>2,085</u>

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

22	DB 2026 £000s	DC 2026 £000s	Total 2026 £000s	DB 2025 £000s	DC 2025 £000s	Total 2025 £000s
<u>Current liabilities</u>						
Rent prepaid by tenants	508	-	508	1,502	-	1,502
Accrued expenses	14,608	-	14,608	8,400	-	8,400
Tax payable	2,815	190	3,005	1,391	250	1,641
Benefits payable	2,205	702	2,907	1,157	270	1,427
Contributions prepaid	3,972	-	3,972	3,914	40	3,954
	<u>24,108</u>	<u>892</u>	<u>25,000</u>	<u>16,364</u>	<u>560</u>	<u>16,924</u>

The increase in accrued expenses in 2026 is primarily relating to expenses due in the year to Plc, which due the contribution abatement the Scheme does not have any methodology to reimburse these.

23. Employer related investments

There is an indirect employer-related investment inherent in the DC Section's participation in Amundi (Index MSCI World Climate Transition CTB Fund, Global Multi-Factor Equity Fund and Index MSCI World SRI Fund) and Aegon (Investment Grade Bond and Pension Corporate Bond Fund) because ABF shares are included in the FTSE All-Share Index. The level of employer related investment is immaterial as at 5 April 2026 and 5 April 2025.

There was no indirect Investment in Associated British Foods Plc within the DB Section as at 5 April 2026 or 5 April 2025.

There was no direct Investment in Associated British Foods Plc within the DB or DC Section as at 5 April 2026 or 5 April 2025.

24. Related party transactions

The Scheme receives employee and employer contributions in respect of Trustee Directors who are Scheme members. The Scheme also pays benefits to former Trustee Directors who have retired. Such transactions are received/paid in accordance with the Schedule of Contributions and Trust Deed and Rules.

Remuneration of £63,363 (2025: £77,855) was paid for the services of the Chairman, £17,719 (2025: £Nil) was paid for the services of the Independent Trustee and £6,045 (2025: £2,191) was paid in respect of Trustee expenses.

The sponsoring employer, ABF Plc, pays the salaries and the employers' pension costs in respect of the employees of the ABF Group Pensions Department. Other costs relating primarily to computer network support, are recharged to the Scheme one year in arrears and are included in the administration and processing costs shown in note 7. Recoverable VAT on the Scheme's administration expenses is refunded to the Scheme by ABF Plc also one year in arrears.

The Scheme is reimbursed for administrative tasks it undertakes for a charity connected with the ABF Group. The recoverable amount shown in note 7 includes:

	2026 £000s	2025 £000s
Weston Provident Fund (charity)	42	42
Member charges for divorce calculations	9	10
	<u>51</u>	<u>52</u>

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

25. GMP Equalisation

As explained on page 6 of the Trustee’s report, a High Court judgement in October 2018 ruled that pension schemes must equalise Guaranteed Minimum Pension (GMP) benefits for male and female members. A follow up High Court judgement in November 2020 extended the requirements to equalise GMP benefits to include previous members who had transferred benefits from the Scheme. The Trustee has consulted the Scheme Actuary and legal advisers to consider the implications of these judgements.

At the Trustee board meeting in March 2025 the Trustee agreed to use the conversion (D2) method to equalise GMPs. The legislation stipulates that the Trustee is required to obtain consent for this method of equalisation from the Scheme’s sponsoring employer and consult with all affected members prior to conversion. ABF plc, as sponsoring employer, replied to the written request from the Trustee formally consenting to GMP benefits within the Scheme being equalised using the conversion (D2) method. The sponsoring employer has consulted with affected members and, in October 2025, confirmed the outcome of that consultation, which was to proceed with the conversion method to equalise GMPs from 1 January 2026 for pensioners and members with deferred pension benefits.

The Scheme Actuary has provided a certificate of actuarial equivalence confirming that the GMP conversion calculations have been carried out in line with legislative requirements. The Scheme Actuary also has produced final benefit calculations using the conversion method. These calculations indicate an increase in the value of the technical provisions for the Scheme as a result of GMP equalisation of £16.3 million.

The costs of equalising the GMP benefits are being accounted for in these financial statements as they are determined.

For members and previous members where GMP benefits remain, the Trustee is undertaking separate sweep-up exercises to convert those GMP benefits.

26. Concentration of investments

The investments (other than UK Government Securities) which were more than 5% of the total value of the net assets of the Scheme at year end were:

	2026	2025
CQS GLOBAL FUNDS I CREDIT MULTI ASSET GBP C3	4.88%	5.02%

ASSOCIATED BRITISH FOODS PENSION SCHEME

NOTES TO THE FINANCIAL STATEMENTS (continued)

27. Contractual commitments

The Trustee has undrawn commitments relating to funds held at the end of the year as follows:

	2026	2025
	£000s	£000s
ALCENTRA	29,393	23,202
ARES III	5,969	5,812
ARES IV	10,399	10,399
ARES V	10,627	10,627
BEACHPOINT IV	48,090	35,611
BEACHPOINT V	19,423	33,374
ARCMONT DLF	10,817	10,838
ARCMONT DLF III	15,210	16,842
ARCMONT SLF	9,629	13,569
ARCMONT DLF IV	13,102	21,972
CORDET	24,295	23,657
CORDET II	13,652	13,294
BRIDGEPOINT	11,197	30,719
HAYFIN II	72,379	63,028
HAYFIN III	40,251	32,113
HIG	2,529	3,075
CLEARLAKE III	-	2,511
CLEARLAKE IV	2,982	2,903
CLEARLAKE V	26,500	15,108
MUZINCH	2,935	2,858
MUZINCH II	5,499	6,897
MORGAN STANLEY	8,332	10,941
NEUBERGER III	8,998	9,822
NEUBERGER IV	7,634	8,077
NEUBERGER V	29,622	40,244
NINETY ONE GLOBAL	12,159	18,832
	441,623	466,325

28. Transfers between sections

Prior to 1 October 2023, transfers between sections occurred as a result of the net movement of DC Section deaths insured by the DB Section, incapacity enhancements and surplus of Trustee funds from member refund of contributions.

From 1 October 2023 additional transfers took place from the DB Section to the DC Section in order to replace the value of DC employer contributions which ceased as part of the contribution abatement as disclosed on page 7 of the Trustee report.

ASSOCIATED BRITISH FOODS PENSION SCHEME

INDEPENDENT AUDITOR'S STATEMENT ABOUT CONTRIBUTIONS TO THE TRUSTEE OF THE ASSOCIATED BRITISH FOODS PENSION SCHEME

We have examined the summary of contributions to the Associated British Foods Pension Scheme for the Scheme year ended 5 April 2026 which is set out on page 45.

In our opinion contributions for the Scheme year ended 5 April 2026 as reported in the summary of contributions and payable under the schedule of contributions have in all material respects been paid at least in accordance with the schedule of contributions certified by the Scheme Actuary on 29 September 2023.

Scope of work on Statement about Contributions

Our examination involves obtaining evidence sufficient to give reasonable assurance that contributions reported in the summary of contributions on page 45 have in all material respects been paid at least in accordance with the schedule of contributions. This includes an examination, on a test basis, of evidence relevant to the amounts of contributions payable to the Scheme and the timing of those payments under the schedule of contributions.

Respective responsibilities of the Trustee and the Auditor

As explained more fully in the Statement of Trustee's Responsibilities, the Scheme's Trustee is responsible for preparing, and from time to time reviewing and if necessary, revising, a schedule of contributions and for monitoring whether contributions are made to the Scheme by the employer in accordance with the schedule of contributions.

It is our responsibility to provide a Statement about Contributions paid under the schedule of contributions and to report our opinion to you.

Use of our statement

This statement is made solely to the Scheme's Trustee, as a body, in accordance with regulation 4 of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, made under the Pensions Act 1995. Our audit work has been undertaken so that we might state to the Scheme's Trustee those matters we are required to state to it in an auditor's statement and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Scheme's Trustee as a body, for our work, for this statement, or the opinions we have formed.



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Ernst & Young LLP
Statutory Auditor

Glasgow
Date: 18 September 2026

ASSOCIATED BRITISH FOODS PENSION SCHEME

STATEMENT OF TRUSTEE RESPONSIBILITIES IN RESPECT OF CONTRIBUTIONS

The Trustee is responsible under pensions legislation for ensuring that there is prepared, maintained and from time to time revised a Schedule of Contributions showing the rates of contributions payable towards the Scheme by or on behalf of the employer and the active members of the Scheme and the dates on or before which such contributions are to be paid. The Trustee is also responsible for keeping records of contributions received in respect of any active member of the Scheme and for procuring that contributions are made to the Scheme in accordance with the schedule.

Trustee Summary of Contributions payable under the Schedule in respect of the Scheme year ended 5 April 2026

This Summary of Contributions has been prepared by, or on behalf of, and is the responsibility of the Trustee. It sets out the employer and member contributions payable to the Scheme under the Schedule of Contributions certified by the Scheme Actuary on 29 September 2023 applicable for the Scheme year ended 5 April 2026. The Scheme Auditor reports on contributions payable under the Schedule in the Auditor's Statement about Contributions.

Contributions payable under the Schedule in respect of the Scheme year	£000s
Employer:	
augmentation contributions	262
Member:	
normal contributions	47,042
Contributions payable under the Schedule	47,304
(as reported on by the Scheme Auditor)	

Reconciliation of Contributions Payable

Reconciliation of contributions payable under the Schedule of Contributions reported in the financial statements in respect of the Scheme year:

Contributions payable under the Schedule (as above)	47,304
Contributions payable in addition to those due under the Schedule (and not reported on by the Scheme Auditor):	
Member additional voluntary contributions	9,071
Total contributions reported in the financial statements	56,375

Signed for and on behalf of Associated British Foods Pension Trustees Limited

Director

17 September 2026

Director

17 September 2026

ASSOCIATED BRITISH FOODS PENSION SCHEME

CERTIFICATION OF SCHEDULE OF CONTRIBUTIONS

MERCER
A MARSH BUSINESS

CERTIFICATE OF SCHEDULE OF CONTRIBUTIONS

Name of the Scheme: Associated British Foods Pension Scheme

Adequacy of rates of contributions

I certify that, in my opinion, the rates of contributions shown in this schedule of contributions are such that the statutory funding objective can be expected to continue to be met for the period for which the schedule is to be in force.

Adherence to statement of funding principles

1. I hereby certify that, in my opinion, this schedule of contributions is consistent with the statement of funding principles dated 21 September 2023.

The certification of the adequacy of the rates of contributions for the purpose of securing that the statutory funding objective can be expected to be met is not a certification of their adequacy for the purpose of securing the Scheme's liabilities by the purchase of annuities, if the Scheme were to be wound up.

Signature



Name

Sam Eida

Date of signing

31 July 2026

Qualification

Chartered Actuary (Fellow)

Name of employer

Mercer Limited

Address

Tower Place
London
EC3R 5BU

Mercer Limited is authorised and regulated by the Financial Conduct Authority
registered in England No. 964278 Registered Office: 1 Tower Place West
Tower Place, London EC3R 5BU

ASSOCIATED BRITISH FOODS PENSION SCHEME

REPORT ON ACTUARIAL LIABILITIES

Under Section 222 of the Pensions Act 2004, every scheme is subject to the Statutory Funding Objective, which is to have sufficient and appropriate assets to cover its technical provisions. The technical provisions represent the present value of the benefits members are entitled to based on pensionable service to the valuation date. This is assessed using the assumptions agreed between the Trustee and the Employer and set out in the Statement of Funding Principles, which is available to Scheme members on request.

The most recent full actuarial valuation of the Scheme was carried out as at 5 April 2023. Updates to the valuation were performed on 5 April 2024 and 5 April 2025. The results of these updates are shown below:

	Actuarial Valuation as at 5 April 2023	Actuarial update as at 5 April 2024	Actuarial update as at 5 April 2025
The value of the Technical Provisions	£2,635 million	£2,419 million	£2,269 million
The value of the assets	£3,648 million	£3,688 million	£3,476 million
Funding level	138%	152%	153%

The method and significant actuarial assumptions used to determine the technical provisions are as follows (all assumptions adopted are set out in the Appendix to the Statement of Funding Principles):

Method

The actuarial method used in the calculation of the technical provisions is the Projected Unit Method.

Significant actuarial assumptions

Investment return (discount rate)

The discount rate used is a term structure derived from the yields on UK Government conventional gilt stocks appropriate to the date of each future cashflow (extrapolated for cashflows beyond the longest available yields) plus 0.5% p.a. outperformance to reflect the prudent allowance the Trustee has agreed for additional investment returns.

Future Retail Prices Index (RPI) inflation

The assumption for the rate of increase in the Retail Prices Index (RPI) will be a term structure derived from the difference between the yield on conventional and index-linked UK Government bonds at the date of each future cashflow (extrapolated for cashflows beyond the longest available bonds).

Future Consumer Price Index (CPI) inflation

The assumption for the rate of increase in the Consumer Price Index (CPI) will be derived from the RPI inflation assumption with an appropriate adjustment to recognise the difference between expectations of future RPI increases and future CPI increases. The adjustment will be reviewed at each valuation; at the 5 April 2023 valuation the adjustment was a deduction of 0.7% per annum until 2030, and no deduction thereafter.

Salary

The assumption for real salary increases (salary increases in excess of CPI inflation) will be determined after consulting the Employer. At the 5 April 2023 valuation the Trustee used an assumption of 0.5% per annum. No additional allowance has been made for promotional increases.

Pension increases

Pension increases linked to inflation are set in line with the relevant inflation assumption, adjusted to reflect any caps or collars on the annual pension increase.

Mortality

For the 5 April 2023 valuation the mortality tables are S3 Year of Birth tables for males and S3_middle Year of Birth tables for females with weightings of 98% for males and 92% for females. Future improvements are based on the CMI 2022 projection model with a smoothing parameter of 7.0, core initial improvements parameter, 0% weighting on 2020 and 2021 data, 25% weighting on 2022 data and long-term improvement rate of 2.0% per annum.

APPENDIX 1: STATEMENT OF INVESTMENT PRINCIPLES

1. Introduction

The purpose of this Statement of Investment Principles ("SIP") is to record the investment arrangements (and the rationale behind those arrangements) adopted by the Trustee of the Associated British Foods Pension Scheme ("the Scheme") in accordance with the requirements of Section 35 of the Pensions Act 1995, as amended by the Pensions Act 2004 and Occupational Pension Scheme (Investment) Regulations 2005.

This SIP has been prepared after obtaining written professional advice from Mercer Limited ("Mercer"), the "Investment Consultant", which is regulated by the Financial Conduct Authority ("FCA"). Where matters described in this Statement may affect the Scheme's funding policy, input has also been obtained from the Scheme Actuary. The Trustee will obtain similar advice whenever it reviews this Statement.

The Trustee's investment powers are set out within the Scheme's governing documentation and relevant legislation. The Trustee notes that, according to the law, it has ultimate power and responsibility for the Scheme's investment arrangements.

The Trustee will seek to maintain a good working relationship with the Associated British Foods plc (the "Company") and will discuss any proposed changes to this Statement with the Company. However, the Trustee's fiduciary obligations to Scheme members will take precedence over the Company's wishes, should these ever conflict.

The Trustee believes that the investment policies and their implementation are in keeping with best practice, including the principles underlying the (Myners) Code of Best Practice for pension fund investment published in 2001 and the Updated Principles and best practice guidance published in 2008.

The Scheme's investment arrangements, based on the principles set out in this Statement, are detailed in the Investment Implementation Policy Document ("IIPD"). Both are available to members on request.

The Scheme is governed by its Trust Deed and Rules which sets out all of the benefits in detail and specifies the Trustee's investment powers. The investment powers do not conflict with this Statement.

2. Scheme Structure

The Scheme has two sections – the Defined Benefit Section ("DB Section") and the Defined Contribution Section ("DC Section").

3. Scheme Governance

A brief overview of the various parties involved in the Scheme's governance structure is set out below.

The Trustee

The Scheme's assets are held in trust by the Trustee. The Trustee is responsible for the investment of the Scheme's assets (although members of the DC Section choose the funds in which to invest from a range of funds made available by the Trustee).

The Trustee has appointed the Investment Consultant to provide relevant advice to the Trustee. The Trustee also takes advice as appropriate from the Scheme Actuary and other professional advisers.

The Trustee has established an Investment Sub-Committee (the "ISC") to focus on investment matters. The role of the ISC is to assume decision making responsibility in the area of specialist investment matters, typically including manager selection and structure decisions.

The Investment Consultant

Mercer has been appointed as the Investment Consultant to the Trustee for both Sections. The details of the Consultant's appointment, in terms of both obligations and remuneration, are contained in a signed agreement between the Trustee and the Consultant. Mercer provides the Trustee with sufficient information to ensure that they are fully informed as to the decisions they take and to monitor those that they delegate.

The DB Investment Managers

The Trustee has chosen to entrust the day-to-day management of the DB Section's investments to a number of specialist managers (the "Investment Managers"), as specified in the IIPD.

Details of the DB Section's strategic framework, within which the Investment Managers operate and a listing of the Scheme's current portfolios managed by the Investment Managers (including a description of the mandates and benchmarks) is set out in the IIPD.

The Trustee has appointed an independent performance measurement company, the Northern Trust Company ("NT"), independent of the Investment Managers to calculate return and risk measures for each Investment Manager's portfolio and for the assets in aggregate. NT provides quarterly reports to the Trustee and more detailed reports on an annual basis. The Investment Consultant also provides quarterly reports.

The ISC meets all investment managers regularly to review the managers actions and performance, and delegates responsibility to the Scheme Secretary to meet with them at least twice each year.

The Custodian

The Scheme's custodian is NT. The custodian is responsible for the safekeeping of the Scheme's assets held in segregated portfolios and for performing the associated administrative duties such as trade settlement, dividend collection, corporate actions, tax reclamation and proxy voting. The Scheme's assets that are held in pooled funds or collective vehicles will be the under the safekeeping of the pooled fund's own custodian.

The Scheme Actuary

Mr Sam Eida of Mercer has been appointed as the Scheme Actuary. The Scheme Actuary performs a valuation of the Scheme at least every three years, in accordance with regulatory requirements (the "Actuarial Valuation"). The main purpose of the Actuarial Valuation is to assess the extent to which the assets cover the accrued liabilities and agree an appropriate funding strategy for the Scheme.

The DC Platform Provider

The Scheme's DC investment arrangement, including the default and self-select fund range, are made available by way of an insurance contract using an investment platform with Mobius Life, the "DC Platform Provider". The DC default investment arrangements are Target Date Funds managed by AllianceBernstein. The self-select funds are managed by a range of investment managers. The terms are contained in the documentation provided by the DC Platform Provider to the Trustee. Either the investment managers or the specific funds in which the DC Section invests are regulated by the FCA.

4. Defined Benefit Section

4.1 Investment Objective

The Trustee believes its prime objective is to invest the Scheme assets in such a manner that it is likely that the Scheme liabilities can be met.

The estimated liabilities are a series of projected cash flows calculated on assumptions contained in the valuation basis. In theory, the matching asset would be a portfolio of UK Government bonds that provided these projected cash flows in all future economic scenarios. Given the discrete number of UK Government bonds available, such a combination is unlikely to exist in practice. It is nonetheless a valid reference point against which to assess investment strategies that can be implemented in practice.

In agreeing to adopt this investment objective, the Trustee has taken into account the Company's view that some risk should be taken in an attempt to reduce the cost of providing the benefits that which would be expected from adopting a fully matched investment strategy.

4.2 Investment Policy

Strategic Management

There is a broad target benchmark split between asset classes for the DB Section. The strategic framework including benchmarks is outlined in the IIPD. The Trustee has recently completed the process of transitioning the DB Section's investment strategy, and associated benchmark split between asset classes, to a low dependency strategy.

The low dependency strategy notionally splits the DB Section asset allocation between a "Liability Portfolio" – currently consisting of global credit, multi-asset credit, UK property, senior private debt, LDI and cash – and an "Unallocated Portfolio" – consisting of equity, opportunistic private credit and a cash buffer. The primary objective of the Liability Portfolio is to reduce liability interest rate and inflation risk while broadly aligning the expected liability cash-flows with the expected asset cash-flows. The portfolio has a secondary objective of generating a modest level of return in order to support the Actuarial Valuation assumptions. The objective of the Unallocated Portfolio is to generate additional risk-adjusted returns for the Scheme, which can potentially be used to help meet other pension needs.

The target allocation to the Liability Portfolio shall be determined such that the assets within it are sufficient to fully-fund the DB Section liabilities of the Scheme on the prevailing valuation basis. Any excess assets will make-up the Unallocated Portfolio. This target allocation is reviewed at least annually.

The Trustee has agreed with the Company a framework for utilising any surplus within the DB Section. If certain funding criteria are met at the Scheme's Annual Funding Assessment on 5 April each year, the Company may be granted a contribution abatement. Any agreed contribution abatement will start from the 1st October following the Annual Funding Assessment and will last for a period of 12 months.

Interest rate and inflation risk exposures are managed via Insight, the Liability Driven Investments ("LDI") manager. The management of these exposures is implemented using a combination of a swap and derivative overlay and the interest rate and inflation characteristics of existing physical bond holdings within the portfolio. The Trustee selected the strategic benchmark to reflect that the Scheme liabilities would change in value in a similar manner to changes in the level of the UK government bond markets. The Trustee expects that there will be a small return premium above government bonds from non-government bonds and a larger return premium from equity markets. The Trustee expects there will be periods when equities, property and credit underperform government bonds and is prepared (as is the Company) to accept this risk.

Implementation of the strategy is via a range of active investment managers whose roles are set out in the IIPD, as well as Insight (the LDI manager), directly held property and BlackRock (the passive currency manager). The Trustee uses NT as the overall custodian of the Scheme assets.

When considering appropriate investments for the Scheme, the Trustee has obtained and considered the written advice of a suitability qualified investment adviser. The advice received and arrangements implemented are, in the Trustee's opinion, consistent with the requirements of Section 36 of the Pensions Act 1995 (as amended).

Day-to-day Management

The Trustee implements its investment strategy by delegating the day-to-day management of the DB Section's assets to the Investment Managers. Details of the Investment Managers as well as the mandates are set out in the IIPD.

The Trustee employs more than one manager to limit the risk to the Scheme as a whole of one manager underperforming for a period.

The Trustee's policy on apportioning assets between the managers is to invest the assets such that the resulting asset allocation reflects the Scheme-specific benchmark.

Currency Hedging

BlackRock has been appointed as a passive currency manager for the Scheme. This is done by hedging 50% of the overseas equity, plus hedging 100% of the overseas public and private debt exposure in the six major currencies – US Dollar, Canadian Dollar, Swiss Franc, Euro, Japanese Yen and Australian Dollar. The hedging arrangements, particularly the level of hedging and asset classes included, were developed in consultation with the Scheme's Investment Consultant and are reviewed regularly.

Rebalancing

Under normal circumstances at the end of each calendar quarter, the actual bond/equity allocation will be reviewed. If the portfolio allocation is outside the agreed range for bonds then, under normal circumstances, the portfolio allocation will be moved back towards the neutral position. In order to reduce dealing costs, the allocation may not be rebalanced to the neutral allocation, but to 2% away from this position. Under normal circumstances, property and cash will not form a part of the rebalancing process. Any decision to not rebalance if the allocations fall outside of the stated ranges will not be deemed as a breach of this SIP.

4.3 Investment Risk

Before deciding to take investment risk relative to the liabilities, the Trustee received advice from the Investment Consultant and Scheme Actuary and held discussions with the Company. In particular, the Trustee considered carefully the following possible consequences:

- The assets might not achieve the excess return relative to the liabilities anticipated. This would result in deterioration in the DB Section's actuarial position.
- The relative value of the assets and liabilities will be more volatile than if investment risk had not been taken. This will increase the likelihood of there being a shortfall of assets relative to the liabilities in the event of discontinuance of the DB Section. This consequence is particularly serious if it coincides with the Company being unable to make good the shortfall.
- This volatility in the relative value of assets and liabilities may also increase the volatility of the Company's contribution rate set at successive actuarial valuations, depending on the approach to funding adopted.

The Trustee's willingness to take investment risk, and the degree of investment risk, is dependent on the continuing financial strength of the Company and their willingness to contribute appropriately to the DB Section. The financial strength of the Company and their perceived commitment to the DB Section is monitored and the Trustee will consider reducing investment risk relative to the liabilities should either of these deteriorate.

The degree of investment risk the Trustee is willing to take also depends on the financial health of the DB Section and its liability profile. The Trustee monitors these with a view to altering the investment objectives, risk tolerance and/or return target should there be a significant change in either. The Trustee notes that the decision to run the Scheme on in the short to medium term and adopt a low dependency strategy has been driven by the strong funding position of the DB Section.

The Trustee reviews the investment strategy regularly and typically conducts a full review following each Actuarial Valuation. The last such review was completed in 2023 and incorporated the results of the 5 April 2023 Actuarial Valuation. The review followed strong improvements in the funding level and focused on a transition to a lower-risk, low dependency strategy. The transition to this strategy was carried out over the following years and has now been completed. The Trustee expects to conduct its next a full review of the investment strategy following the completion of the 5 April 2026 Actuarial Valuation.

The Trustee believes that the arrangements adopted, and those they plan to transition to, represent a satisfactory trade-off between target return (net of all costs) and investment risk after taking into account the resources available to implement and monitor the arrangements.

In addition to targeting an appropriate overall level of investment risk, the Trustee seeks to spread risks across a range of different sources. The Trustee aims to take on those risks for which the Trustee expects to be rewarded over time, in the form of excess returns. The Trustee believes that diversification limits the impact of any single risk.

To implement the hedging strategy, the Trustee appointed a specialist LDI manager, who is responsible for managing interest rate and inflation hedging strategies for the Scheme.

Investment risk is measured by reference to the likely annual variation in return between the matching portfolio of investments and the investment arrangements adopted.

The Trustee has also considered various combinations of assets and investment management approaches that might minimise the required degree of risk for a level of return expectation consistent with the assumptions in successive actuarial valuations.

The risks identified below is not exhaustive, but covers the key risks considered by the Trustee to be financially material to the DB Section.

Interest Rate and Inflation Risk

The DB Section's funding position is sensitive to changes in interest rates and inflation expectations. The Trustee mitigates this risk by setting a strategic benchmark for the LDI manager that broadly aligns with the interest rate and inflation sensitivities of the DB Section's liabilities. The Trustee has put in place a policy whereby the LDI manager hedge a large proportion of this sensitivity.

Currency Risk

A risk where the Trustee does not expect excess returns over time is currency risk. As part of the most recent strategy review, the Trustee agreed to hedge 50% of its non-Sterling equity and 100% of its public and private debt currency exposure on a passive basis to the six major foreign currencies. This is implemented by the investment managers and BlackRock.

Credit Risk

The DB Section is subject to credit risk as the Trustee elects to invest in bonds, OTC derivatives, has cash balances and enters into repurchase agreements. The DB Section also invests in pooled investment vehicles and is therefore indirectly exposed to credit risk in relation to the instruments it holds in the pooled investment vehicles. With respect to the Scheme's bond assets, this risk is managed via the strategic asset allocation and by investing actively in

diversified portfolios of bonds managed by specialist credit managers. Credit risk arising from the Scheme's derivative counterparties is significantly reduced, but not altogether eliminated, by the process of daily collateralisation. The Trustee diversifies their counterparty exposures in order to avoid undue reliance on any one investment bank.

Liquidity Risk

The Trustee recognises that there is liquidity risk in holding assets that are not readily marketable and realisable. Given the long-term investment horizon of the Scheme, the Trustee believes that a degree of liquidity risk is acceptable because it expects to be rewarded for assuming it. The amount invested in illiquid investments, such as property and private debt, will take into account the Scheme's cashflow requirements (for example the payment of member benefits and possible collateral requirements arising from the Scheme's derivative positions). The strategy is designed to be sufficiently liquid to meet these potential cashflow requirements under stressed scenarios.

Counterparty Risk

The Trustee is also exposed to a risk associated with a counterparty to a financial contract not meeting its obligations. The derivative portfolio managed by Insight primarily restricts the collateral to UK investment grade government bonds and cash, except for two legacy derivatives whereby the collateral is restricted to North American and Western European investment grade government bonds and cash. The Trustee will consider winding up the positions under these legacy agreements should an appropriate price be available.

Operational Risk

The Trustee mitigates operational risk, being the loss resulting from inadequate or failed internal processes, people, systems or external events, by monitoring and evaluating investment managers at regular intervals, reviewing the results of the control assurance reports from investment managers as part of the annual audit and segregation of funds for each asset class.

The Trustee has also considered various combinations of assets and investment management approaches that might minimise the required degree of risk for a level of return expectation consistent with the assumptions in successive actuarial valuations. The Trustee considers the risks highlighted above to be financially material and these risks are considered over the anticipated lifetime of the DB Section.

Manager Risk

There is a risk that the day-to-day management of the assets will not achieve the rate of investment return expected by the Trustee. The Trustee recognises that the use of active investment managers involves such a risk. However, for specific asset classes it believes that this risk is outweighed by the potential gains from successful active management. The Trustee appoints a range of active investment managers to mitigate this risk.

4.4. Responsible Investment and Corporate Governance

The Trustee believes that good stewardship and environmental, social and governance ("ESG") issues may have a material impact on investment performance and risk, and that good stewardship can create and preserve value of companies and markets. The Trustee also recognises that long-term sustainability issues, particularly climate change, present risks and opportunities that increasingly may require explicit consideration.

The Trustee has given its investment managers discretion when evaluating ESG factors (including climate change considerations) and in exercising rights and stewardship obligations attached to the Scheme's investments. This is in accordance with the investment managers own corporate governance policies and current best practice, including the UK Corporate Governance Code and the UK Stewardship Code. The Trustee has not set any restrictions on the appointed investment managers in relation to products or activities but may consider this in future. The Trustee has set carbon intensity reduction targets for the DB Section's aggregate equity portfolio and fixed income - public investment grade credit portfolio. The Trustee monitors managers against these carbon intensity targets.

The Trustee considers how ESG, climate change and stewardship are integrated within investment processes in appointing new managers and monitoring existing investment managers. The Trustee may also consider the degree of

alignment of managers' engagement priorities with their own priorities in any new appointments and ongoing monitoring. Monitoring is undertaken on a quarterly basis at Investment Sub-Committee meetings.

The Trustee does not currently explicitly consult members when taking account of the selection, retention and realisation of investments, but may consider ways to incorporate member views in future.

The Scheme's voting rights are exercised by its investment managers in accordance with their own corporate governance policies and should take account of current best practice. The Trustee expects its FCA registered managers to comply with the UK Stewardship Code. The Trustee encourages its non-FCA authorized managers to adhere to the Stewardship Code on a best efforts basis. The Trustee may, from time to time, ask the Scheme's Investment Managers to explain their corporate governance policy and practices, and review their voting activities. These reviews may include consideration of the Investment Manager's engagement priorities and the degree of alignment with the Trustee's own engagement priorities and definition of significant votes. Additionally, the Trustee asks the Investment Managers to provide annual reports indicating the overall level of voting activity and detailing any instances where they have not voted in line with their stated policy.

4.5 Liquidity

With the DB Section being mature, the move to the low dependency portfolio and the potential for continuing contribution abatements, the Trustee understands liquidity planning is becoming an increasingly important consideration, especially where the annual cash flow requirements can represent a significant proportion of the Section's assets.

Going forwards, the Trustee aims to meet the Scheme monthly cash outflows, to the extent possible, using income generated from the Scheme's assets.

5. Defined Contribution Section

5.1 Investment Objectives

The Trustee recognises that members have differing investment needs and that these may change during the course of members' working lives.

The Trustee believes that most members do not have the detailed knowledge or desire to manage their pension investments. The Trustee regards it as its duty to make available (as the default investment option) a fund which:

- is suitable for most members;
- is dynamically managed; and
- has a risk and reward profile that reflects the period until its participating members reach retirement age.

The Trustee also regards its duty as making available a range of investment options sufficient to enable members to tailor their investment strategy to their own needs if they wish to do so. The Trustee has the objective of grouping these investments into 'tiers' based on the amount of member involvement required in investment management.

The investment objective of each Target Date fund (default fund) is designed and managed for an investor saving to retire in or around the years stated in its name (the "target date"). The investment manager's aim is to maximise, for a typical such investor, their eventual retirement income while taking account of their decreasing capacity to afford losses as they approach and, possibly, go past the target date of retirement. On retirement, the investor is assumed to use their built-up pension savings to provide pension income from the options available when they retire. The Target Date funds will progressively move from riskier, capital growth-oriented assets such as equities and property, into lower-risk retirement income protection oriented assets, such as bonds, as it approaches and passes its target date. The investment manager seeks to ensure that the mix of assets remains appropriate given the Target Date Fund's aim and will also employ a dynamic asset allocation strategy which seeks to mitigate the effects of large market movements without detracting from long-term returns. The manager will manage the Target Date Funds in such a way that, for an

individual investing over the whole term of each Target Date Fund, a return of beating inflation over the life of the funds is being targeted.

A review of the default strategy and the performance of the default funds was undertaken during the 2024 Scheme year against the aims and objectives as set out in this SIP. The review included the following key areas:

- Value of Assets In the Target Date Funds
- Introduction of private debt assets into the Target Date Funds
- Consideration of whether all Target Date Fund Vintages had outperformed or underperformed their objective

Overall, the review concluded that the default strategy and its returns remain consistent with the Trustee's objectives as set out in the SIP and that Target Date Funds remain an appropriate default investment vehicle for the Scheme.

5.2 Investment Risk

The Trustee has considered risk from a number of perspectives in relation to the DC section, including the default option. The list below is not exhaustive, but covers the main risks considered by the Trustee to be financially material.

Statement of Investment Principles

Risk	How it is Managed	How it is measured
Market Risk The risk that low investment returns over members' working lives or unfavourable market movements in the years just prior to retirement will secure an inadequate pension.	The Trustee provides members with a range of funds, across various asset classes, including actively and passively managed options. Members are able to set their own investment strategy in line with their aims and risk tolerances.	The performance of the available funds is monitored on a quarterly basis.
Interest Rate Risk The risk that unfavourable interest rate movements, particularly in the years just prior to retirement may lead to a reduction in the pension that the member's retirement account can secure.	The Trustee provides members with a range of funds, across various asset classes, which will have varying sensitivities to interest rate risk.	The performance of investment funds and market fundamentals, including interest rates, are monitored on a quarterly basis. This helps the Trustee understand the effect that changes in interest rates are having on the funds.
Inflation Risk The risk that investments do not keep pace with inflation.	The Trustee provides members with a range of funds, across various asset classes, which have varying exposure to inflation risk. These include inflation index linked funds, as well as equities which are generally viewed to have inflation hedging properties.	Quarterly performance reports consider the long-term performance of the funds to help the Trustee assess whether the returns have kept pace with inflation.
Manager Risk The risk that the chosen underlying investment managers underperform the benchmark against which the managers are assessed.	In particular, the Trustee has considered the risk that active managers may underperform, whereas passive managers are likely to achieve a return close to any chosen benchmark. The Trustee believes active management skills exist and can be identified but not with complete certainty. As such the Trustee makes available to members both actively managed and passively managed funds.	The Trustee considers the ratings of investment strategies from their DC Investment Consultant during the selection process. It is the Trustee's policy to monitor performance and rating of funds on an ongoing basis relative to the fund's benchmark and stated targets/objective.
Mismatch Risk The risk that the financial assets a member is invested in as they approach retirement are not suited to the way they will access their retirement benefit.	The Trustee has made available to members a range of funds including shares, cash and bond funds that can be selected by members as they approach retirement. The default option follows a lifestyle strategy which progressively switches to assets the Trustee expects will be less volatile to reduce mismatch risk for members targeting income drawdown.	It is the Trustee's policy to monitor performance and rating of funds on an ongoing basis and identify how the characteristics of certain funds are suitable for different retirement options.

Risk	How it is Managed	How it is measured
Liquidity Risk The risk that assets may not be readily marketable when required.	The pooled funds in which the Trustee allows members to invest provide the required level of liquidity. Units in the pooled funds in which the Scheme invests are believed to be readily redeemable.	When considering new investment options or reviewing existing options, the Trustee considers the pricing and dealing terms of the underlying funds.
Concentration Risk The risk that a portfolio has an over-allocation to a single asset class, sector, country or counterparty, thereby having a high exposure to non-systemic risk factors.	The Trustee has made a range of funds available to members, so that they can choose to invest in a well-diversified portfolio. The range of funds enables diversification by asset class (e.g. equity, bonds, cash), by region and includes both passively and actively managed funds, which can help achieve diversification.	It is the Trustee's policy to monitor performance and rating of funds on an ongoing basis. The Trustee also periodically reviews the default investment option and self-select range, and as part of this considers the correlations or similarities between the available funds.
Sponsor Risk The risk that the sponsoring company of the Scheme will cease financial sponsorship.	The Trustee has considered the risk that the Company may be unwilling or unable to continue to contribute to the Scheme in the future.	The Trustee has concluded that this risk is acceptable and that no further action is necessary to mitigate this risk at the current time. The Trustee will review this position in the event of any material changes in the circumstances of the sponsor.
Exchange Rate Risk The value of an investment in the member's base currency may change as a result of fluctuating foreign exchange rates.	With a diverse spread of assets geographically, the Trustee accept that there is a degree of risk for members as a result of varying sensitivities of fluctuating exchange rates.	Monitoring the performance of investment funds on a quarterly basis, including quarterly market reviews considering the movements in foreign currencies relative to pound sterling.
Environmental, Social and Governance Risk ESG factors can have a significant effect on the performance of the investments held by the Scheme, e.g., extreme weather events, poor governance.	The Trustee's policy on ESG risks is set out in Section 5.7 of this Statement.	As set out in Section 5.7, monitoring is undertaken on a regular basis and is documented annually.

The items set out in this section of the SIP are those that the Trustee considers to be financially material considerations in relation to the Defined Contribution Section and the default investment arrangement. The Trustee believes that the appropriate time horizon within which to assess these considerations should be viewed at the member level. This will be dependent on the member's age and when they expect to retire. Members are reminded to review the suitability of their investment choices via their annual benefit statements and other Scheme communication.

5.3 Investment Strategy

The Trustee believes that the risks identified in chapter 5.2 are best managed by, and the objectives in chapter 5.1 are best met by, a default range of Target Date Funds which are linked to a target retirement age of 65 for each particular member and by offering members a range of investment vehicles from which to choose. The self-select range of investments includes equities, bonds, cash, alternatives and diversified growth funds.

Members are free to choose any of the funds available across the default Target Date Funds and self-select range. Members can elect for their accrued funds to be invested differently from their future contributions.

The investment strategy of the Defined Contribution Section and the default funds will be reviewed at least every three years and without delay after any significant change in investment policy or to the demographic profile of relevant members.

5.4 Investment Management Structure

The Trustee has appointed AllianceBernstein as investment manager of the Target Date Funds. Both the Target Date Funds and self-select fund range are made available on the Mobius Life platform. There are a variety of funds available across different asset classes and with a range of investment managers. Details of the funds available and their objectives can be accessed at www.abfpensions.com/dc.

5.5 Monitoring the Investment Manager and Platform Provider

The Trustee monitors the performance of the default investment strategy and self-select funds on a regular basis. The Trustee also monitors the effectiveness of the platform provider. To assist the Trustee, the platform provider regularly supplies the Trustee with unit reconciliations and fund factsheets.

5.6 Investment Restrictions

As the assets of the Defined Contribution section are invested in pooled fund vehicles the investment restrictions applying to these funds are determined by the investment manager. The Trustee is satisfied that the investment manager's policy on investing in individual securities held in each vehicle provides adequate diversification of investments.

5.7 Responsible Investment and Corporate Governance

The Trustee believes that environmental, social and corporate governance (ESG) factors may have a material impact on investment risk and return outcomes, and that good stewardship can create and preserve value for companies and markets as a whole. The Trustee also recognises that long-term sustainability issues, particularly climate change, present risks and opportunities that increasingly may require explicit consideration.

That said, the Trustee has elected to invest in pooled funds and cannot therefore directly influence the ESG policies, as well as the ethical policies and practices of the companies in which the pooled funds invest.

However, the Trustee expects the underlying managers to evaluate ESG factors, including climate change considerations, 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 the UK Stewardship Code.

The DC investment managers acknowledge that ESG issues are recognised as having an impact on the investment risk and return outcomes, and that good stewardship can create and preserve value for companies and markets as a whole.

The governance approach used by AllianceBernstein, as the investment manager of the default target Date Funds, where they directly hold individual investments is to incorporate this through "integration", whereby a bottom-up

integration of ESG factors into the research and investment process is key to identifying investment risks as well as opportunities.

The method for implementing this is via a two-pronged approach to active ownership:

1. By engaging directly with equity and bond issuers as part of the research process, and
2. By utilising the in-house proxy voting policy which incorporates ESG factors.

The Target Date Funds primarily utilise a selection of underlying third-party investment managers' funds, selected by AllianceBernstein, to gain access to a broad range of investments. As these underlying funds are predominantly passive/systematic approaches, the incorporation of active ESG consideration when making any single investment is limited. Furthermore, as these underlying funds are not managed by AllianceBernstein, the ability to incorporate their own ESG policies is somewhat limited.

To address this, AllianceBernstein are increasingly making use of custom fund arrangements that provide the flexibility to impose their own ESG policies. However, in cases where this is not possible, AllianceBernstein review shortlisted managers' UNPRI signatory status, ESG and ownership/stewardship policies, and proxy voting history to ensure that any appointed manager is as closely aligned to their policies as possible.

AllianceBernstein regularly monitors appointed managers as part of their ongoing due diligence process.

The Trustee accepts AllianceBernstein's policy on the voting rights attached to investments, which can be found online: www.alliancebernstein.com/content/dam/corporate/corporate-pdfs/AB-Proxy-Voting-and-Governance-Policy.pdf

The Trustee may review AllianceBernstein's engagement priorities from time to time and notes the alignment of the manager's current priorities - of climate change, modern slavery and executive compensation - with the priorities set by the Trustee, as outlined in the following section. The AllianceBernstein produces an annual report on their engagement within these priority areas which is available online

<https://www.alliancebernstein.com/corporate/en/corporate-responsibility/responsible-investing.html?tab=reporting-center>

The Trustee considers how ESG, climate change and stewardship are integrated within investment processes in appointing new investment managers and monitoring existing investment managers. Monitoring is undertaken on a regular basis by the Investment Sub-Committee and documented annually.

These policies apply across the range of investment options made available to members including the default investment arrangement and the self-select investment fund range.

Member views have not explicitly been taken into account in the selection, retention and realisation of investments, although feedback received from members is welcomed and considered by the Trustee. However, specialist funds are available within the fund range to cater for members who wish to invest their assets accordingly e.g. the Storebrand Global ESG Plus Lux Fund, the Legal & General Future World Global Equity Fund, the HSBC Islamic Global Equity Index and the Legal & General FTSE4 Good Developed Equity Index.

In line with the requirement to conform to the Task Force on Climate-Related Financial Disclosures (TCFD) and the statutory requirements prescribed by the Department of Work and Pensions, the Trustee produces an annual TCFD report.

5.8 Liquidity and Realisation of DC Investments Policy

The Target Date Funds have exposure to illiquid assets, including private equity, global property, and sustainability-oriented infrastructure (in a sleeve called "Sustainable Opportunities"). These exposures are accessed through listed vehicles (e.g., investment trusts) to support greater liquidity, though there is potential for some reduced liquidity when compared to listed securities issued by large issuers (e.g., corporates, governments). The Target Date Funds also have exposure to private debt, which takes the form of unlisted investment into illiquid assets. The Trustees believe that,

subject to suitable investments being available, some allocation to illiquid assets can, overall, provide potential for improved risk-adjusted returns for members invested in the default arrangements. The whole asset allocation of the Target Date Funds is holistically managed, which is critical for the effective management of cashflows and liquidity. It is the responsibility of the appointed investment manager, AllianceBernstein, to monitor liquidity daily.

They must ensure there is sufficient liquidity available to meet calls from the private debt fund managers within each private debt allocation, and this is managed via a sub-fund. The sub-fund comprises a liquid equity fund (for younger members) and a short duration credit fund (for older members), through which all cashflows in and out of private debt are directed. In addition to being a liquidity reserve and destination for cashflows, the sub-fund's exposure to public capital markets minimises the cash drag. The sub-fund will be prudently managed to ensure a high level of private credit exposure, while ensuring a sufficient buffer should it be required. Given that cashflows are managed at the Target Date Fund strategy level, the need for significant outflows is unlikely. Income distributions will be paid to the listed market sub-fund and may be retained in this buffer allocation or reinvested into private debt.

In the unlikely event that liquidity is unavailable in the sub-fund of listed funds, it is agreed that this can be funded from other allocations held within the Target Date Funds.

The Trustee intends to keep investment in illiquid assets, and whether to increase the investment in illiquid assets, under consideration into the future periodically and no later than the next review of the default strategy.

6. Engagement Priorities and Significant Votes

6.1 Engagement Priorities

The Trustee's engagement priorities are based on their belief that ESG issues, across each of the three factors, may have a material impact on investment performance. As such the Trustee has determined what they consider the most salient topic within each of the three ESG factors, as listed below.

Engagement Priority	Rationale
Environment: Climate Change	Climate-related financial impacts are driven by the associated transition to a low-carbon economy and the physical damages of different climate outcomes. The Trustee believes climate change issues present risks and opportunities that increasingly may require explicit consideration.
Social: Human rights including modern Slavery	Workforce and supply chain safety and human rights practices should avoid contributing to modern slavery, exploitation and other human rights abuses – these can contribute to economic instability, the threat of social tension and subsequent political instability which, in turn, may have a negative impact on investment performance. The Trustee notes alignment of this priority with the Company's Supplier Code of Conduct and the commitments made therein.
Governance: Executive remuneration	Executives have significant influence over the financial success of the companies which they manage. Therefore, executive remuneration policies can have a meaningful impact on the return of investors in companies. These policies should attract and retain talent whilst ensuring alignment of incentives with company and shareholder objectives.

6.1 Significant Votes

The Trustee considers a vote to be significant if the holding makes up more than 2% of the relevant fund's value and:

- It relates to any of the Trustee's engagement priorities, as set out above; or
- It has a direct financial impact on the company.

Any vote on exposures, irrespective of the purpose of the vote, that make up more than 5% of the relevant fund are considered significant.

To aid reporting, the Trustee reports on the most significant votes, defined as votes in relation to the largest three fund holdings that meet the above significant criteria, on an annual basis within the Implementation Statement. This statement is available to members online or upon request.

7. Additional Voluntary Contributions (AVCs)

7.1 Defined Benefit Arrangements

New AVC payers

For DB members that applied to start paying AVCs from 1 October 2012, the Trustee has made available the investment fund range referred to in chapter 5.3 and applies to all new AVC Investments.

8. Other assets

The only other Scheme assets relate to un-invested cash, maintained for the day-to-day management of the Scheme. This is managed by Associated British Foods Pensions Department, liaising with the Company's Treasury Management division to ensure a market rate of interest is obtained.

The monthly cash out flows are currently more than the monthly cash inflows from contributions and therefore a specific investment strategy is followed to generate cash through non-reinvestment of dividends, bond maturities etc.

9. Realisation of Investments

In general, the Investment Managers have discretion in the timing of realisations of investments and in considerations relating to the liquidity of those investments, subject to not exceeding the Trustee's powers as set out in the Trust Deed and Rules. The Investment Managers are responsible for generating any cash required for benefits and other expenditure on the instructions of the Trustee.

10. Aligning Manager Appointments with Investment Strategy

The managers are appointed by the Trustee based on their capabilities and, therefore, their perceived likelihood of achieving the expected return and desired risk characteristics. The Trustee looks to Mercer, where appropriate, for their forward-looking assessment of a manager's ability to outperform over a full market cycle. This view will be based on the Mercer's assessment of the manager's idea generation, portfolio construction, implementation and business management, in relation to the particular investment fund that the Scheme invests in and makes available to DC members. Mercer's manager research ratings assist with due diligence (and questioning the investment managers during presentations to the Trustee) and are used in decisions around selection, retention and realisation of manager appointments. The Trustee will consider how ESG and stewardship are integrated into the investment process as well as ensuring fees are competitive within the asset class. If the investment objectives for a particular manager's fund change, the Trustee will review the fund appointment to ensure that it remains appropriate and consistent with the wider Trustee's investment objectives. The Trustee accepts that it has no ability to specify the risk profile and return targets of the manager. Such issues are taken into consideration when selecting and monitoring the managers to align with the overall investment strategy requirements.

11. Incentivising Managers to consider Long-Term Financial and Non-Financial Performance

The Trustee has considered how each manager embeds ESG into its investment process and how the manager's responsible investment philosophy aligns with the Trustee's beliefs around responsible investment. This includes the managers' policy on voting and engagement (where relevant). The Trustee will use this assessment in decisions around selection, retention and realisation of manager appointments where applicable.

The Trustee meets with the investment managers periodically and can challenge decisions made including voting history and engagement activity to ensure the best performance over the medium to long term.

The managers are aware that their continued appointment is based on their success in delivering the mandate for which they have been appointed. If the Trustee is dissatisfied, then they will consider replacing the manager.

12. Evaluating Investment Manager Performance and Remuneration

The Trustee receives investment performance reports from Mercer and AllianceBernstein on a quarterly basis, which present performance information over 1 quarter, 6 month, 1 year, 3 year and 5 year periods. As well as considering each manager's style over the course of an economic cycle, the Trustee reviews absolute performance and in many cases relative performance against a suitable index used as a benchmark. The Trustee's focus is primarily on long-term performance but, as noted above, may review a manager's appointment if:

- There are sustained periods of underperformance;
- There is a change in the portfolio manager or portfolio management team;
- There is a change in the underlying objectives of the investment manager;
- There is a significant change to Mercer's rating of the manager.

The investment managers are generally remunerated by way of a fee calculated as a percentage of assets under management. If managers are not meeting performance objectives, or investment objectives for mandates have changed, the Trustee may ask managers to review the Annual Management Charge or decide to switch managers.

As part of the annual value for members assessment, the Trustee reviews the DC investment managers' fees.

13. Manager Turnover

The Trustee is a long-term investor and is not looking to change the investment arrangements on a frequent basis. For all funds apart from the Private Debt contracts, there is no set duration for the manager appointments. The Trustee will therefore retain an investment manager unless:

- For the DB Section, there is a strategic change to the overall strategy that no longer requires exposure to that asset class or manager;
- For the DC section, the mandate is no longer considered to be optimal nor have a place in the default investment strategy or self-select fund range;
- The manager appointed has been reviewed and the Trustee has decided to terminate the mandate.

14. Portfolio Turnover Costs

The Trustee asks investment managers to include portfolio turnover and turnover costs in their presentations and report to the Trustee. The Trustee also receives MIFID II reporting from their investment managers. All reporting is analysed to ensure consistency between reporting periods and any inconsistencies are investigated with the investment manager. The Trustee will continue to monitor industry improvements concerning the reporting of portfolio turnover costs. For the DC Section, the Trustee considers portfolio turnover costs as part of the annual value for money assessment.

15. Compliance with this Statement

The Trustee will monitor compliance with this Statement periodically. The investment managers are provided with copies of this Statement periodically. The Trustee will review this Statement in response to any material changes to any aspects of the Scheme, its liabilities, finances and the attitude to risk of the Trustee and the Company which they judge to have a bearing on the stated investment policy. This review will occur no less frequently than triennially to coincide with the Actuarial Valuation. Any such review will again be based on written expert advice and will be in consultation with the Company.

APPENDIX 2: ANNUAL DC GOVERNANCE CHAIR'S STATEMENT FOR THE SCHEME YEAR ENDING 5 APRIL 2026**PREPARED IN ACCORDANCE WITH REGULATION 23 OF THE OCCUPATIONAL PENSION SCHEMES (SCHEME ADMINISTRATION) REGULATIONS 1996 (THE "REGULATIONS")**

As the Chair of the Associated British Foods Pension Trustees Limited, I, together with my fellow Trustee Directors, must continually review and assess the Associated British Foods Pension Scheme's ("the Scheme") systems, processes, and controls across a number of areas to ensure they are consistent with those set out by legislation and The Pensions Regulator (TPR). Governance requirements apply to defined contribution ("DC") pension arrangements, to help members achieve a good outcome from their pension savings. The Trustee of the Scheme is required to produce a yearly statement (which is signed by the Chair of the Trustee) to describe how these governance requirements have been met in relation to:

- The investment options in which members' funds are invested (this means the "default arrangement" and other funds members can select or have assets in, such as self-select).
- The requirements for processing financial transactions.
- The charges and transaction costs borne by members, including:
 - Reporting net investment returns.
 - An illustration of the cumulative effect of these costs and charges.
 - Assessment of value for members.
 - Target date fund asset allocations.
- Trustee knowledge and understanding; and
- Scheme operations statement.

This Statement provides an insight to the steps taken during the Scheme year ending 5 April 2026 to ensure our compliance with these requirements for the DC Section.

1. DEFAULT INVESTMENT ARRANGEMENT-TARGET DATE FUNDS (TDFs)

All members are either contractually or automatically enrolled into the Scheme. Their contributions are invested by default into the Target Date Fund (TDF) applicable to their Normal Retirement Age of 65 (although members can choose an alternative target retirement age, if they wish). As at 31 March 2026 about 98% of the DC section's assets were invested within the TDFs. The option to select different investment funds is included in the Scheme welcome letter which members receive from the ABF Pensions Department. The Trustee has set out the following aims and objectives for the Target Date Funds:

- It is likely to be appropriate for most members;
- The Glidepath is designed to manage risk dynamically and to seek significant long-term above inflation growth while members are further from their target retirement date;
- It has a risk and reward profile that addresses the various risks that members face as identified by the Trustee in the SIP, in particular that these reflect the period remaining until members reach retirement age and their ability to recover any market losses. As members move towards their retirement "target date", the Fund gradually reduces risk by changing the investments within the Fund to ensure it has an asset allocation at the target retirement date that is appropriate and consistent with how most members are expected to take their retirement savings; and
- It includes the Trustee's consideration of environmental, social and governance (ESG) factors including climate change and stewardship risks.

The Trustee regularly reminds members to review their investment options via annual communications and the Scheme website www.abfpensions.com/dc/investments to ensure they remain appropriate.

- 1.1 A copy of the latest Statement of Investment Principles (SIP) prepared in accordance with Regulation 2A of the Occupational Pension Schemes (Investment) Regulations 2005 is attached as Appendix 1 to the Financial Statements.
- 1.2 The Trustee is responsible for the Scheme's investment governance. This includes setting and monitoring the investment strategy for the Scheme's default arrangements. The Trustee reviewed the default strategy and performance of the default funds four times during the Scheme year against the aims and objectives as set out in the SIP. The reviews included the following key areas:

- Value of assets in the TDFs
- Market background detailing asset class performance
- Deep dive into TDF range performance, including attribution data and comparison with the Scheme's investment advisor Mercer's universe of funds and other providers' default investment arrangements.
- Alliance Bernstein's commentary including performance relative to targets and asset allocation decisions
- Consideration of whether all TDF vintages had under- or outperformed their objectives and if they remain on track to deliver the objectives over the long term
- Membership analysis (demographic analysis undertaken to stress test risk parameters)
- Manager monitoring and updates including a deep dive analysis on any specific funds which require closer monitoring

The Trustee carries out a full formal review of the Scheme's DC investment strategy every 3 years. The last formal review was completed on 7 March 2024.

As a result of this the Trustee decided to:

- Postpone derisking of TDFs and to increase the level of risk in TDFs at and beyond target date to reflect that pension savings will increasingly be accessed through drawdown.
- Introduce allocations to private credit in the TDFs to improve the glidepath's balance of risk and reward.
- Change the TDF's objectives so that they should now provide an above inflation return over the life of the glidepath, while managing risk as members approach retirement.

These changes have all been implemented.

The Trustee also reviewed the range of alternative self-select funds which were available to members for whom the default strategy did not meet their needs. The Trustee added 4 funds and removed those where either there were only a very small number of members or contributions or where the funds were no longer delivering value for money. After the review and resulting sales, the Scheme now offers 38 different self-select funds.

The next formal review of the Scheme's DC default investment strategy and self-select range is intended to take place by the end of the Scheme year to 5 April 2027.

Over 1 year and 3-year periods to 31 March 2026 all TDFs have outperformed their inflation-based targets (as measured by the Consumer Price Index). Over a 5-year period, the majority of the TDFs have underperformed their targets. Over this 5 year period there have been relatively high levels of inflation leading to above expected inflation targets. All TDFs have outperformed their targets since inception.

2. CORE FINANCIAL TRANSACTIONS

2.1 Regulation 24 of the Occupational Pension Schemes (Scheme Administration) Regulations 1996 requires the Trustee to ensure that core financial transactions have been processed promptly and accurately during the Scheme year. Core financial transactions include investment of contributions, transfers of assets relating to members into and out of the Scheme, transfers of assets relating to members between different investments within the Scheme and payments from the Scheme to, or in respect of, members. The Trustee has received assurances from the Scheme's administrator, ABF Pensions Department, and as such is confident that the requirements of Regulation 24 have been met during the year for the following reasons:

- The Trustee treats all transactions which relate to the handling of contributions and assets as core financial transactions. All receipts have been matched to the corresponding payments to ensure that all transactions are monitored on a daily basis and actioned in a timely manner. This control complements existing member level unit reconciliations and provides an increased level of monitoring at transaction level.
- Contributions for each pay period from all pay-sites were tracked to record the date the monies were received and the date the schedule providing a breakdown of the contributions per member was received. This was checked against a pre-agreed Contribution Calendar. Processes are in place to resolve any issues directly with the senior management teams of the employer within one working day and to rectify any systems failures etc to ensure the issue is not repeated.

- All contributions received by the Scheme were invested within two working days of receipt of the correct funds, file and supporting documents detailing the breakdown of individual member contributions, whichever was the latter.
- Transfers of members' assets into and out of the Scheme were processed in accordance with the Pensions Act requirements and complied with the Transfer Regulations (which came into effect from June 2022).
- Members' assets being switched between different funds within the Scheme were actioned in a timely manner and in accordance with the members' instructions.
- Payments from the Scheme to, or in respect of, members were completed in a timely manner and in accordance with statutory requirements.
- The Scheme Administrator utilises internal Service Level Agreements to drive and monitor all aspects of the day-to-day administration. These include the accuracy and timeliness of all core financial transactions. These include:
 - All payments are actioned within 5 working days once monies have completed disinvestment from Mobius Life.
 - Contributions including individual transfers into the Scheme are invested within 2 working days of receipt of monies and confirmation of who the payments relate to.
 - Once instructions for switches between funds are confirmed these are mostly actioned within 5 working days.
 - A workflow monitoring tool is in place which is used to monitor Compliance against the Service Levels in respect of all cash movements within the DC Section.
 - All receipts into the Trustee bank account are reconciled against contribution files and member data.
 - At least two individuals are involved with checking investment transactions.

The Head of Group Pensions reviews all logs and monthly reconciliation reports and provides an update of any findings to both the Trustee Board and Audit Sub-Committee. The Trustee also receives quarterly Administration Reports detailing the administrator's performance and compliance. The Scheme administrator adopts an Internal Controls Framework (based on AAF01/20) and has provided confirmation that all receipts for the financial year were matched to the corresponding payments. In addition, confirmation has been received that all transactions were monitored on a daily basis and actioned in a timely manner and well within statutory deadlines. These checks were complementary to both the daily bank reconciliations and monthly member level unit reconciliations.

I am happy to report that during the Scheme year there were no regulatory breaches reported, no issues were found that gave rise to concern by the Trustee and there are no outstanding issues at the date of this statement.

3. CHARGES AND TRANSACTION COSTS

- 3.1 The Trustee is required to set out the on-going charges borne by members in this statement, which are annual fund management charges plus any additional fund expenses, such as custody costs, but excluding transaction costs; this is also known as the Total Expense Ratio ("TER"). The TER is paid by the members and is reflected in the unit price of the funds. The Employer meets all administration and risk costs for the DC Section of the Scheme. The Trustee is also required to separately disclose transaction costs figures that are borne by members. In the context of this statement, the transaction costs shown are those incurred when the Scheme's fund managers buy and sell assets within the investment funds.

The Trustee is also required to calculate and state the return on investments from their default and self-select funds, net of transaction costs and charges and disclose the asset allocation of the default investment strategy. This information is also included within this section, and all calculations have been completed in line with statutory guidance, where applicable.

3.2 Target Date Fund charges and transaction costs

The levels of charges and transaction costs applicable to the 22 default Target Date Funds at the end of the Scheme year are shown in the table below. The Target Date Funds have been designed to help manage investment risk which means that as members move towards their retirement "target date", the fund gradually reduces risk by changing the investments within the fund. This means that the level of charges and transaction costs will vary depending on how close members are to their target retirement date and which fund they are invested in. The Trustee is required to separately disclose the transaction costs for each Fund (see penultimate column below). The costs and charges shown in the table below have been produced in line with statutory guidance.

Fund Name	Alliance Bernstein Fee (%) (a)	Mobius Life Platform Charge (%) (b)	Additional Fund Expenses (%) (c)	Total Expense Ratio (%) (a+b+c)	Transaction Costs (%)	Fund returns net of fees & costs (%)
AB Retirement Fund 2011-2013	0.191	0.040	0.0220	0.2530	0.10	7.67
AB Retirement Fund 2014-2016	0.191	0.040	0.0220	0.2530	0.10	7.66
AB Retirement Fund 2017-2019	0.191	0.040	0.0220	0.2530	0.10	7.65
AB Retirement Fund 2020-2022	0.191	0.040	0.0220	0.2530	0.11	7.73
AB Retirement Fund 2023-2025	0.191	0.040	0.0230	0.2540	0.12	7.84
AB Retirement Fund 2026-2028	0.191	0.040	0.0240	0.2550	0.14	8.27
AB Retirement Fund 2029-2031	0.191	0.040	0.0260	0.2570	0.16	8.73
AB Retirement Fund 2032-2034	0.191	0.040	0.0280	0.2590	0.21	9.98
AB Retirement Fund 2035-2037	0.191	0.040	0.0290	0.2600	0.24	11.26
AB Retirement Fund 2038-2040	0.191	0.040	0.0290	0.2600	0.28	12.35
AB Retirement Fund 2041-2043	0.191	0.040	0.0290	0.2600	0.32	13.27
AB Retirement Fund 2044-2046	0.191	0.040	0.0280	0.2590	0.36	14.00
AB Retirement Fund 2047-2049	0.191	0.040	0.0280	0.2590	0.39	14.40
AB Retirement Fund 2050-2052	0.191	0.040	0.0280	0.2590	0.40	14.36
AB Retirement Fund 2053-2055	0.191	0.040	0.0280	0.2590	0.40	14.36
AB Retirement Fund 2056-2058	0.191	0.040	0.0280	0.2590	0.40	14.36
AB Retirement Fund 2059-2061	0.191	0.040	0.0280	0.2590	0.40	14.36
AB Retirement Fund 2062-2064	0.191	0.040	0.0280	0.2590	0.40	14.36
AB Retirement Fund 2065-2067	0.191	0.040	0.0280	0.2590	0.40	14.36
AB Retirement Fund 2068-2070	0.191	0.040	0.0280	0.2590	0.40	14.36
AB Retirement Fund 2071-2073	0.191	0.040	0.0280	0.2590	0.40	14.36
AB Retirement Fund 2074-2076	0.191	0.040	0.0280	0.2590	0.39	14.46

There are no performance-based fees charged by Alliance Bernstein or Mobius Life on The Target Date Funds.

This data has been provided by Alliance Bernstein and Mobius Life as at 31 March 2026 and shows return net of fees and costs for the previous 12 months.

3.3 Target Date Funds net investment returns

The net returns are shown as an annual geometric average. The annual net return, which compounded over time, delivered the returns shown below as at 31 March 2026 which have been calculated in line with the statutory guidance:

Fund Name	Inception Date	Age of Member in 2026 (Years)	Annualised Returns 1 Year p.a. (2026) Net (%)	Annualised Returns 3 Years p.a. (2023-2026) Net (%)	Annualised Returns 5 Years p.a. (2021-2026) Net (%)	Annualised Returns 10 Years p.a. (2016-2026) Net (%)
AB Retirement Fund 2011-2013	30/09/2012	79	7.7	6.4	3.6	3.8
AB Retirement Fund 2014-2016	30/09/2012	76	7.7	6.3	3.4	3.9
AB Retirement Fund 2017-2019	30/09/2012	73	7.7	6.3	3.4	4.3
AB Retirement Fund 2020-2022	30/09/2012	70	7.7	6.4	3.5	4.8
AB Retirement Fund 2023-2025	30/09/2012	67	7.8	6.5	3.6	5.3
AB Retirement Fund 2026-2028	30/09/2012	64	8.3	6.9	4.0	6.0
AB Retirement Fund 2029-2031	30/09/2012	61	8.7	7.3	4.1	6.5
AB Retirement Fund 2032-2034	30/09/2012	58	10.0	8.2	4.8	7.2
AB Retirement Fund 2035-2037	30/09/2012	55	11.3	9.4	5.8	8.0
AB Retirement Fund 2038-2040	30/09/2012	52	12.3	10.8	7.0	9.0
AB Retirement Fund 2041-2043	30/09/2012	49	13.3	12.1	8.2	9.9
AB Retirement Fund 2044-2046	30/09/2012	46	14.0	13.0	8.8	10.2
AB Retirement Fund 2047-2049	30/09/2012	43	14.4	13.2	8.9	10.2
AB Retirement Fund 2050-2052	30/09/2012	40	14.4	13.2	8.9	10.2
AB Retirement Fund 2053-2055	30/09/2012	37	14.4	13.2	8.9	10.2
AB Retirement Fund 2056-2058	30/09/2012	34	14.4	13.2	8.9	10.2
AB Retirement Fund 2059-2061	30/09/2012	31	14.4	13.2	8.9	10.2
AB Retirement Fund 2062-2064	31/10/2012	28	14.4	13.2	8.9	10.2
AB Retirement Fund 2065-2067	28/02/2013	25	14.4	13.2	8.9	10.2
AB Retirement Fund 2068-2070	28/02/2013	22	14.4	13.2	8.9	10.3
AB Retirement Fund 2071-2073	28/02/2013	19	14.4	13.2	9.1	10.4
AB Retirement Fund 2074-2076	31/12/2024	16	14.5	-	-	-

3.4 Target Date Funds Asset Allocation

Asset Class	Average 25 y/o (%)	Average 45 y/o (%)	Average 55 y/o (%)	Average 65 y/o (%)
Cash	0.00	0.00	0.00	0.00
Bonds	0.00	0.84	11.60	47.52
Government Bonds	0.00	0.32	4.36	30.97
Corporate Bonds	0.00	0.52	7.24	10.56
Short Duration Bonds	0.00	0.00	0.00	5.99
Listed Equities	75.36	74.55	64.58	37.33
Developed Market Equities	68.24	67.51	59.98	36.26
Emerging Market Equities	7.12	7.04	4.60	1.07
Private Equity	5.30	5.18	4.25	0.99
Property	3.99	3.97	3.41	1.31
Infrastructure	1.82	1.82	3.10	1.02
Private Debt	10.36	10.48	10.37	10.45
Other	3.17	3.16	2.69	1.38
Total	100.00	100.00	100.00	100.00

This data has been provided by Alliance Bernstein and as at 31 March 2026.

The following describes the types of investments covered by the above asset classes:

- Cash – Cash and assets that behave similarly to cash e.g. treasury bills. It only includes invested cash and not the cash balance held by the Scheme.
- Bonds – Loans made to the bond issuer, usually a government or a company, to be repaid at a later date.
- Listed Equity – Shares in companies that are listed on global stock exchanges. Owning shares makes the Scheme a part owner of the company, entitled to a share of the profits (if any) payable as dividends.
- Private Equity – Unlisted equities that are not publicly traded on stock exchanges. Encompasses a broad range of investment styles, including: Venture Capital – Small, early stage businesses that may have high growth potential, albeit at significant risk, Growth Equity – Relatively mature companies that are going through a transformational event with potential for growth, Buyout funds – Invested in more mature businesses, often taking a controlling interest, Leveraged buyout funds take out loans to raise the funds required to invest.
- Property – Real estate, potentially including offices, retail buildings which are rented out to businesses.
- Infrastructure: physical structures, facilities, systems, or networks that provide or support public services including water, gas and electricity networks, roads, telecommunications facilities, schools, hospitals, and prisons
- Private Debt – Other forms of loan that do not fall within the definition of a 'Bond'.
- Other – Any assets that do not fall within the above categories.
- Leverage – Certain underlying investments, particularly within private markets, may involve the use of leverage. While this can support returns, it may also increase risk in certain market conditions. The Trustee considers this as part of its regular review of the investment strategy. The level of leverage employed within underlying funds is controlled at the investment manager level and forms part of the Trustee's broader oversight of risk within the default strategy.

3.5 Self-select options charges and transaction costs

The Trustee also offers DC members access to a wide range of self-select funds on the Mobius Life platform. Together with the Target Date Funds these self-select funds are also available to DB members who wish to pay Additional Voluntary Contributions (AVCs). Over the year members had access to 38 funds. The self-select assets account for less than 2% of members and assets in the DC section. The Total Expense Ratio (TER) for these funds' ranges from 0.069% to 0.925% per year. (The TER can be negative where Mobius is able to buy units at the bid price when it has bought the assets at a lower price than their true value. Similarly, a negative cost would be seen if Mobius sold units at the offer price.) Detailed information about these funds can be found on the Scheme website at www.abfpensions.com/dc/investments. The level of charges and transaction costs applying to the self-select funds currently available to DC and DB AVC members at the end of the Scheme year are shown in the table below:

Mobius Life has provided transaction costs and returns net of fees for the 12 months to 31 March 2026.

The Trustee is required to disclose separately the transaction costs for each fund.

Fund Name	Investment Manager Fees (%)	Mobius Life Platform Charges (%)	Additional Fees Expenses (%)	Total Expense Ratio (%)	Transaction Costs (%)	Fund Returns net of Fees (%)
AB Dynamic Diversified Beta	0.13	0.04	0.02	0.19	0.11	10.9
AB Global Plus Fixed Income (ABF)	0.50	0.04	0.09	0.63	0.09	2.3
abrdn Sterling Corporate Bond Fund (ABF)	0.50	0.04	0.09	0.63	0.01	4.4
Aquila Connect Over 15 Year Corporate Bond (ABF)	0.05	0.04	0.01	0.10	(0.03)	2.2
Aquila Life World Equity Index (ABF)	0.05	0.04	0.01	0.10	0.01	15.6
Artemis SmartGARP Global Equity (ABF)	0.75	0.04	0.13	0.92	0.21	38.2
AXA Framlington American Growth (ABF)	0.61	0.04	0.06	0.71	0.12	1.6
AXA Framlington UK Select Opportunities (ABF)	0.61	0.04	0.07	0.72	0.11	6.1
BlackRock Aquila Connect Corporate Bond All Stocks Fund (ABF)	0.04	0.04	0.01	0.09	0.01	4.4
BlackRock Gold & General (ABF)	0.71	0.04	0.15	0.90	0.62	97.1
BlackRock Institutional Sterling Liquidity (ABF)	0.10	0.04	0.00	0.14	(0.03)	4.1
HSBC Islamic Global Equity Index (ABF)	0.11	0.04	0.04	0.19	0.01	17.3
Insight Broad Opportunities Fund (ABF)	0.50	0.04	0.18	0.72	0.00	7.2

Fund Name	Investment Manager Fee (%) (a)	Mobius Life Platform Charge (%) (b)	Additional Fund Expenses (%) (c)	Total Expense Ratio (%) (a+b+c)	Transaction Costs (%)	Fund returns net of fees & costs (%)
iShares Emerging Markets Index (ABF)	0.06	0.04	0.07	0.17	(0.03)	26.4
JPM Natural Resources (ABF)	0.69	0.04	0.07	0.80	0.56	60.5
LGIM All Stocks Gilt Index (ABF)	0.04	0.04	0.00	0.08	(0.01)	2.5
LGIM All Stocks Index Linked Gilt (ABF)	0.04	0.04	0.00	0.08	0.07	3.5
LGIM Asia Pacific (ex Japan) Developed Equity (ABF)	0.08	0.04	0.00	0.12	0.01	47.2
LGIM Europe (ex UK) Equity Index (ABF)	0.08	0.04	0.00	0.12	0.05	11.8
LGIM FTSE4Good Developed Equity Index Fund (ABF)	0.30	0.04	0.00	0.34	0.01	16.3
LGIM FTSE4Good UK Equity Index Fund (ABF)	0.20	0.04	0.00	0.24	0.03	14.8
LGIM Future World Global Equity Fund (ABF)	0.08	0.04	0.00	0.12	0.02	14.8
LGIM Global Real Estate Equity Index (ABF)	0.08	0.04	0.10	0.22	0.02	6.5
LGIM Japan Equity Index (ABF)	0.08	0.04	0.00	0.12	0.02	21.4
LGIM Managed Property Fund (ABF)	0.60	0.04	0.13	0.77	0.03	4.4
LGIM North American Equity Index (ABF)	0.08	0.04	0.00	0.12	0.00	13.1
LGIM UK Equity Index (ABF)	0.03	0.04	0.00	0.07	0.02	19.5
LGIM World ex UK Equity Index (ABF)	0.08	0.04	0.00	0.12	0.02	16.5
Liontrust European Dynamic Fund (ABF)	0.75	0.04	0.09	0.88	0.35	21.4
MPS Meridian Global Equity Institutional (ABF)	0.55	0.04	0.15	0.74	0.00	(1.7)
Ninety One Emerging Markets Blended Debt Fund	0.69	0.04	0.20	0.93	0.44	10.1

Fund Name	Investment Manager Fee (%)	Mobius Life Platform Charge (%)	Additional Fund Expenses (%)	Total Expense Ratio (%)	Framlington Code (%)	Fund Returns net of fees p.a.
Norden 1 - GBP Diversified Return Fund (ABF)	0.41	0.04	0.13	0.58	0.18	(2.5)
Schroder Global Emerging Markets (ABF)	0.37	0.04	0.22	0.63	0.36	36.3
Schroder Institutional UK Smaller Companies (ABF)	0.50	0.04	0.01	0.55	(0.08)	9.2
Schroder Life Intermediated Diversified Growth (ABF)	0.55	0.04	0.05	0.64	0.32	12.1
Stewart Investors Asia Pacific Leaders (ABF)	0.76	0.04	0.04	0.84	0.31	6.4
Storebrand Global Plus Lux (ABF)	0.17	0.04	0.06	0.27	0.12	11.6
Vanguard FTSE Developed World ex UK (ABF)	0.08	0.04	0.00	0.12	0.07	15.0

3.6 Self-select net investment return

Mobius Life has provided returns net of fees for the 12 months to 31 March 2026.

Fund Name	Inception Date	1 Year p.a.	3 Years p.a.	5 Years p.a.	10 Years p.a.
		(%) Net	(%) Net	(%) Net	(%) Net
AB Dynamic Diversified Beta	30/09/2012	10.9	10.2	6.2	8.0
AB Global Plus Fixed Income (ABF)	14/03/2019	2.3	3.1	(0.2)	1.0
Aberdeen Corporate Bond Fund (ABF)	14/03/2019	4.4	5.3	(0.5)	2.2
Aquila Connect >15 Year Corporate Bond (ABF)	14/03/2019	2.2	0.9	(6.5)	0.2
Aquila Life World Equity Index (ABF)	14/03/2019	15.6	14.5	10.9	12.9
Artemis SmartGARP Global Equity (ABF)	14/03/2019	38.2	20.4	12.9	12.7
AXA Framlington American Growth (ABF)	14/03/2019	1.6	10.0	8.3	14.7
AXA Framlington UK Select Opportunities (ABF)	14/03/2019	6.1	3.3	1.5	3.3
BlackRock Gold & General (ABF)	14/03/2019	97.1	40.3	24.3	17.5
BlackRock Institutional Sterling Liquidity (ABF)	14/03/2019	4.1	4.8	3.3	1.8
HSBC Islamic Global Equity Index (ABF)	14/03/2019	17.3	17.1	12.9	15.4
iShares Emerging Markets Index (ABF)	14/03/2019	26.4	12.8	4.5	8.7
JPM Natural Resources (ABF)	14/03/2019	60.5	18.4	18.7	16.2
LGIM All Stocks Gilt Index (ABF)	14/03/2019	2.5	0.3	(4.4)	(0.8)
LGIM All Stocks Index Linked Gilt (ABF)	14/03/2019	3.5	(3.5)	(7.0)	(0.8)
LGIM Asia Pacific (ex Japan) Dev Equity (ABF)	14/03/2019	47.2	14.3	7.6	10.2
LGIM Europe (ex UK) Equity Index (ABF)	14/03/2019	11.8	9.1	8.0	9.5

Fund Name	Inception Date	1 Year p.a. (%) Net	3 Years p.a. (%) Net	5 Years p.a. (%) Net	10 Years p.a. (%) Net
LGIM FTSE4Good Developed Equity Index (ABF)	14/03/2019	16.3	14.1	11.4	13.1
LGIM FTSE4Good UK Equity Index (ABF)	14/03/2019	14.8	11.7	10.2	0.0
LGIM Global Real Estate Equity Index (ABF)	14/03/2019	6.5	5.3	2.9	4.4
LGIM Japan Equity Index (ABF)	14/03/2019	21.4	14.2	7.5	9.8
LGIM North American Equity Index (ABF)	14/03/2019	13.1	15.3	12.0	14.6
LGIM Property Fund (ABF)	14/03/2019	4.4	3.8	2.0	-
LGIM UK Equity Index (ABF)	14/03/2019	19.5	12.9	10.8	8.5
LGIM World ex UK Equity Index (ABF)	14/03/2019	16.5	14.7	10.9	13.1
Liontrust European Dynamic (ABF)	14/03/2019	21.4	12.5	12.3	12.7
MFS Meridian Global Equity Institutional (ABF)	14/03/2019	(1.7)	3.0	3.5	8.4
Ninety One Emerging Markets Local Currency Debt (ABF)	14/03/2019	10.1	5.8	4.1	4.1
Schroder Institutional UK Smaller Companies (ABF)	14/03/2019	9.2	6.9	(0.9)	6.3
Schroder Life Intermediated Div Growth (ABF)	14/03/2019	12.1	7.8	3.4	4.5
Schroders Global Emerging Markets (ABF)	14/03/2019	36.3	14.3	4.9	10.3
Stewart Investors Asia Pacific Leaders (ABF)	14/03/2019	6.4	3.5	2.5	7.3
Storebrand Global ESG Plus Lux (ABF)	31/12/2019	11.6	11.5	8.4	-
Vanguard FTSE Developed World ex UK (ABF)	14/03/2019	15.0	14.3	10.7	-
LGIM Future World Global Equity Fund (ABF)	14/08/2024	14.8	-	-	-
BlackRock Aquila Connect Corporate Bond All Stocks Fund (ABF)	13/08/2024	4.4	-	-	-
Insight Broad Opportunities Fund (ABF)	13/08/2024	7.2	-	-	-
Nordea 1 – GBP Diversified Return Fund (ABF)	14/08/2024	(2.5)	-	-	-

Net fund performance for self-select funds is calculated on the percentage change of the net unit prices from the start to the end of the period and includes any income the Fund receives. The net fund performance figures are shown after deductions for annual management charge and additional fund expenses. Fund expenses will vary depending on the costs incurred.

The following fund names changed during the Scheme year until the date of this statement sign off:

Old Fund Name	Date Changed	New Fund Name
Storebrand Global ESG Plus Lux Fund	21 May 2025	Storebrand Global Plus Lux Fund

All charges are collected through a daily adjustment in unit prices and are payable to the following parties:

Alliance Bernstein (AB) for investment management and asset allocation advice in relation to the Retirement Strategies Funds. This includes management fees charged by third-party fund managers in relation to any other underlying funds by which the value of the AB Retirement Strategies Funds is determined.

Mobius Life for the administration, establishment and maintenance of the Retirement Strategies Funds.

Additional fund expenses payable to third-party fund managers in relation to expenses incurred by those underlying funds such as custodian fees, audit fees, depository/trust fees and legal fees. These expenses are dependent upon the underlying asset allocation of the Retirement Strategies Funds at any given time.

The **total expense ratio** of the Retirement Strategies Fund is the total annual cost associated with managing and operating the Retirement Strategies Fund.

During the Scheme year the following fund closed and it was merged into another fund which is available for members to invest in:

Fund Name	Date Suspended	Comments
Ninety One Emerging Markets Local Currency Debt Fund	10 October 2025	Ninety One Emerging Markets Blended Debt Fund

If a fund is suspended or closed, the steps taken are as follows:

1. The fund manager will notify the investment platform provider, Mobius Life, who in turn will notify the Trustee.
2. On behalf of the Trustee, the administration team identify which members are affected and notify them in writing, seeking confirmation of their instructions for existing and/or future contributions (as applicable). If members do not provide an investment instruction, their existing and/or future contributions (as applicable) will be invested in their default Target Date Fund.
3. In certain circumstances the Trustee may not be notified of the fund suspension or closure in advance. In this situation, the Trustee will invest any future contributions in the member's default Target Date Fund until the member is able to provide an alternative investment instruction.
4. The member website is updated to show the fund is suspended or closed.

3.7 Legacy Additional Voluntary Contributions (AVC) (Defined Benefit AVCs that commenced prior to 2012)

Since April 2023 all contributions to AVC arrangements have been invested in the funds available through the Mobius Life investment platform. During the year to April 2025 all AVCs invested within the legacy arrangements with Clerical Medical, Phoenix Life, Prudential, Reassure and Standard Life were disinvested and either transferred to the DC investment funds on the Mobius Life platform or paid out to members as retirement benefits. The Scheme no longer holds any DC or AVC monies outside of the Mobius Life platform.

3.8 The impact of charges on a member's fund

All pension arrangements will apply charges to a member's account which cover items such as the cost of administering their account and the cost associated with the investments. As sponsor of the Scheme, ABF covers all of the running costs. So, the only charges borne by members are those related to the investment funds. Most members in the Scheme are invested in the default option, the maximum charge for these funds is 0.260%. This is significantly lower than the maximum permitted charge for default funds of 0.75%. As member's fund growth can be significantly affected by the charges deducted over time, it's important that they understand how their fund at retirement can be impacted.

Additionally, in all DC pension schemes, a further layer of costs is incurred when contributions are invested. This is because investments involve transactions such as buying, selling, lending, and borrowing of investments - and all these transactions incur costs. Transaction costs are payable by members in addition to the AMC and the additional fund expenses described above.

3.9 Default investment arrangement costs

The following tables show the estimated costs for the target date fund cohorts. This is based on the estimated cost of regular contributions and rebalancing events and the spread of the underlying portfolios, rolled up into the TDF. Please note that the figures and costs shown represent the worst-case level of costs (i.e., a full mid-offer spread) and the actual spreads experienced are typically lower. As most members of the Scheme are invested in the default arrangement an illustration is shown as follows.

Example:		
Annual salary		£33,000
Total contribution (from member and employer)		8%
Total investable contribution (per year)		£2,640
Average pot size		£35,820
Future Investment charges (based on rate applicable as at 31 March 2026)	0.253%-0.260% depending on age	
Transaction costs associated with contributions		
Based on average Mld to Offer Spread of Target Date Funds as at 31 March 2026 including those that are incurred for single swinging priced funds prudently assuming that the swing is unfavourable for all such transactions		0.0610%
Transaction costs associated with ongoing investment management		
Based on average total transaction costs associated with investment management for the period 31.3.2023-31.3.2026 including rebalancing costs associated with trading between single swinging priced funds. In years where costs were negative (i.e. beneficial to members) these have been counted as zero for the purposes of these calculations.		0.0925%

The table below shows the potential impact over time of costs and charges borne by the Scheme's DC members on projected values over a range of ages.

Standard default arrangement			
Years	Accumulated contributions before investment returns, costs and charges	Projected fund value before the deduction of costs and charges	Projected fund value after the deduction of costs and charges
1	2,640	38,418	39,290
3	7,999	46,959	46,545
5	13,467	55,007	54,238
10	27,620	77,512	75,533
15	42,496	103,818	100,078
20	58,130	134,476	128,290
25	74,562	170,115	160,637
30	91,832	211,369	197,565
35	109,983	256,398	237,204
40	129,060	304,399	278,744
43	140,970	328,811	299,277

Assumptions used

- Projected pension pot values are shown in today's terms and do not need to be reduced further for the effect of future inflation.
- The starting pot size is assumed to be £35,820 at age 22 for a member retiring at age 65.
- Inflation is assumed to be 2.5% each year.
- Contributions are assumed to be paid at the beginning of each month from age 22 to 65 and increase in line with assumed earnings inflation of CPI plus 1.0% each year on the anniversary of the first contribution. Initial contribution level is assumed to be £220.00 per month.
- Values shown are estimates and are not guaranteed.
- Charges are based on a prudent historical average of charges (as a percentage of the fund invested) including all member borne charges and underlying transaction costs. This is likely to overestimate the impact of these costs and charges as it is likely they will fall through time as the size of the plan grows and provision of administration and investment services to the plan becomes more efficient. Furthermore, we note that the transaction costs incurred when buying and selling the TDF strategies has been included in this analysis, which is noted as an option for trustees and investment managers within the guidance provided by the DWP.
- The projected future growth rate, after all costs and charges have been deducted, for the default strategy is initially CPI + 3% up until 15 years before retirement reducing gradually to CPI + 1% at 5 years before retirement – based on the latest assumptions used to produce member SMPI illustrations as at 31 March 2026. These are in line with the targets set for the default strategies by the Trustee. For purposes of these illustrations these rates, gross of charges, has been capped at 2.5% plus estimated transaction costs in line with DWP guidance and for the period to 5 April 2020.
- The provision of these outcomes on behalf of members assumes the provision of investment services, as such the numbers shown for the accumulated fund allowing for investment returns but before the deduction of costs and charges is purely hypothetical and does not represent an achievable member outcome.
- In addition, the Trustee is required to provide value for money to members and as such it would be inappropriate to assume that lower costs and charges would necessarily equate to better member outcomes i.e. that the assumed level of overall service to members, including the investment returns achieved, could be maintained at a lower cost.

3.9.1 Self-select Funds Illustration on impact of charges

The table below shows the potential impact over time of costs and charges borne by the Scheme's DC members on the lowest and highest charging funds, using the member assumptions shown below.

Example:	
Starting age	23
Annual salary	£33,000
Total contribution (from member and employer)	8%
Total investable contribution (per year)	£2,640
Average pot size	£35,820

Projected pension pot values (today's terms) (£45,820 at age 23)				
Years	Most expensive fund: JPM Natural Resources		Least expensive fund: L&G UK Equity Index	
	Projected fund value before the deduction of costs and charges	Projected fund value after the deduction of costs and charges	Projected fund value before the deduction of costs and charges	Projected fund value after the deduction of costs and charges
1	£46,357	£45,786	£46,763	£46,728
3	£50,223	£48,280	£48,151	£48,032
5	£61,240	£57,505	£57,252	£57,027
10	£94,653	£84,217	£83,477	£82,874
15	£138,369	£116,986	£115,440	£114,251
20	£195,354	£157,048	£154,264	£152,213
25	£269,418	£205,885	£201,285	£198,011
30	£365,455	£265,273	£258,095	£253,127
35	£489,752	£337,342	£326,589	£319,320
40	£650,382	£424,644	£409,022	£398,672
42	£727,038	£464,495	£446,483	£434,635

- Projected pension pot values are shown in today's terms and do not need to be reduced further for the effect of future inflation.
- The starting pot size is assumed to be £35,820 at age 23 for a member retiring at age 65.
- Inflation is assumed to be 2.5% each year.
- Contributions are assumed to be paid at the end of each month from age 23 to 65 and increase in line with assumed earnings inflation of CPI plus 1.0% each year on the anniversary of the first contribution. Initial contribution level is assumed to be £220 per month.
- Values shown are estimates and are not guaranteed.
- Charges are based on a prudent historical average of charges (as a percentage of the fund invested) including all member borne charges and underlying transaction costs. This is likely to overestimate the impact of these costs and charges as it is likely they will fall through time as the size of the plan grows and provision of administration and investment services to the plan becomes more efficient. Transaction costs incurred when buying and selling the self-select funds have not been included in this analysis.
- The projected future growth rate is assumed to be 7% p.a. for the JPM Natural Resources Fund. The TER applicable for the JPM Natural Resources Fund is 0.795% p.a. and the transaction costs are assumed to be 0.594% p.a. which is the average transaction cost over the 5 years to 5 April 2026.
- The projected future growth rate is assumed to be 6% p.a. for the L&G UK Equity Index Fund. The TER applicable for the L&G UK Equity Index Fund is 0.069% p.a. and the transaction costs are assumed to be 0.018% p.a. which is the average transaction cost over the 5 years to 5 April 2026.
- Transaction costs for the self-select funds have been averaged over a 5 year period from 6 April 2021 to 5 April 2026. Funds inception within that 5 year period have been assessed from the point of inception up until 5 April 2026. Where annual transaction costs are negative, they have been assumed to be zero.
- The provision of these outcomes on behalf of members assumes the provision of investment services, as such the numbers shown for the accumulated fund allowing for investment returns but before the deduction of costs and charges is purely hypothetical and does not represent an achievable member outcome.
- In addition, the Trustee is required to provide value for money to members and as such it would be inappropriate to assume that lower costs and charges would necessarily equate to better member outcomes i.e. that the assumed level of overall service to members, including the investment returns achieved, could be maintained at a lower cost.

3.10 Transaction costs

Over a period of time, the charges and transaction costs that are taken out of a member's pensions savings can reduce the amount available to the member at retirement. Transaction costs have been obtained from the investment managers who invest money for the Trustee. For the Target Date Funds these are shown on the fourth page of this document and on the seventh to ninth pages for the self-select funds. Transaction costs can be positive or negative depending on how the market moves between arrival and execution and depends on the time period used.

Historical Fund performance information can be found on the fund factsheets for each of the available funds, the factsheets are available on the website at www.abfpensions.com/dc/investments. We also provide members under two years to normal retirement age with a personalised projection on their benefit statements each year.

3.11 Net Investment Returns

The DWP recommends that figures for net investment returns should be shown dating back at least 5 years and the Trustee has selected standard reporting periods of 1 year, 3 years, 5 years and added 10 years for clarity even though there is no data currently available for some of the funds reporting, as the inception date for these funds is less than 10 years ago.

The self-select fund is distinct from the underlying fund, with its own price and other fund specific details. However, the fund is fully invested in the underlying fund. The performance of the fund will not exactly match that of the underlying fund due to price swings, valuation timing or charges. Fund performance shown on pages 9 and 10 is based on the unit prices calculated each day for the fund. Each fund has a single unit price, which means that on any given date, an investor will purchase units at the same price as an investor selling units.

3.12 Value for Members Assessment

The Trustee's assessment of the extent to which the charges and transaction costs set out above represent good value for members relative to what members receive and to other comparable schemes is that members of the ABF Scheme continue to receive excellent value.

This is demonstrated by the following:

- According to the Department for Work & Pensions 2024/25 Pension Provider Survey, which was published on 21 July 2025, the median average member charge for the providers' largest default fund by assets under management was 0.28% per year. The total expense ratio for the ABF Scheme's largest TDF by assets under management was 0.27% per year. The lowest average decile charge among other providers for their largest default fund was 0.21% and the highest average decile charge was 0.35%. For the ABF Scheme the TER for all default TDFs was either 0.26% or 0.27% per year.
- The maximum TER for the Scheme's default fund is 0.27% per year which is much lower than the total charges for a member in the National Employment Savings Trust (NEST) who we understand currently incurs total charges on contributions equivalent to 2.1% according to NEST's March 2026 quarterly investment report.
- The TDFs are run on actively managed glidepaths. Their investment performance since inception has ranged from 3.8% to 10.4% per year. All funds achieved their target of beating inflation as measured by the Consumer Price Index. Over the past year investment performance for TDFs ranged from 7.7% to 14.5%. Again, all beat their CPI target.
- There are strict controls in place to ensure timely investment and accuracy of contributions as described in section 2.1.
- The Employer meets all other costs of running the DC section such as administration and communications.

The chart below illustrates the impact of charges for a 30-year-old member who is paying £200 a month into the Scheme and is invested in the default fund option. In preparing the chart below, the Trustee had regard to how the level of charges incurred by the Scheme members in the default fund compare to those levied by National Employment Savings Trust (NEST).



Band 1 - no charge – the fund could be £285,890

Band 1 shows the potential fund at age 65 if no charges were deducted from the fund or contributions. Unfortunately, as all investment managers will make a charge for running the fund, this result is only provided for comparison purposes.

Band 2 - 0.3% charge – the fund could be £265,861

Band 2 shows the potential fund at age 65 for a member of the Scheme who is invested in the default TDF option. The Scheme does not deduct any charges from your contributions, so if you pay £100, then the full £100 is used to purchase units in your chosen investment fund.

Band 3 - 0.4% charge – the fund could be £259,534

Band 3 shows the potential fund at age 65 for the average charge for DC members.

Band 4 - 0.7% charge – the fund could be £241,539

Band 4 shows the potential fund at age 65 if a charge a little below the maximum charge of 0.75% that is permitted for a default fund is levied.

Band 5 - 2.1% charge – the fund could be £174,181

Band 5 shows the fund if a 2.1% charge was taken from total contributions. This is similar to the charge that we understand is currently levied by National Employment Savings Trust (NEST). According to NEST's March 2026 quarterly investment report, NEST will deduct 1.8% from each contribution paid, meaning that from £100, only £98.20 is used to purchase units. They then deduct a further investment charge of 0.3% on the fund.

The Trustee assessment of the extent to which the charges and transaction costs set out above represent good value for members relative to what members receive and to other comparable schemes and have concluded that members continue to receive excellent value.

This is demonstrated by the following:

- According to the DWP Pension Provider Survey 2024/25, the average member charge for Qualifying Workplace unbundled DC trust-based schemes (i.e., comparable to the Scheme) was 0.48% pa, whereas the maximum total expense ratio for the Scheme's default fund at the year-end was 0.261% pa.
- The maximum total expense ratio for the Scheme default fund is 0.261% per annum which we understand is much lower than the total charges for a member in the National Employment Savings Trust (NEST) who we understand currently incurs 2.1% in total charges according to NEST's March 2025 quarterly investment report.
- The TDFs are actively managed glidepaths using passive sleeves of assets and their investment performance since inception has ranged between 3.8% and 9.8% per annum which was above the relevant benchmark in all cases and ranged from 3.0% and 6.3% per annum in the current year.
- There are strict controls in place to ensure timely investment and accuracy of contributions as per our monitoring procedures in 2.1.
- The Employer meets all other costs of running the DC section e.g., administration and communications.

4. TRUSTEE KNOWLEDGE AND UNDERSTANDING

4.1 In order to run the Scheme effectively, the Trustee Directors are required to maintain appropriate levels of knowledge and understanding. Sections 247 and 248 of the Pensions Act 2004 require that each Trustee Director:

- is conversant with the trust deed and rules of the Scheme, the Scheme's Statement of Investment Principles and any other document recording policy for the time being adopted by the Trustee relating to the administration of the Scheme,
- has, to the degree that is appropriate for the purposes of enabling the individual to properly exercise his or her functions as a Trustee Director, knowledge and understanding of the law relating to pensions and trusts and the principles relating to investment of the assets of occupational pension schemes.

4.2 The Trustee has measures in place to comply with the requirement under Sections 247 & 248 of the Pensions Act 2004 regarding conversance and knowledge and understanding for the Scheme year ending 5 April 2026. Details of how the conversance and knowledge and understanding requirements have been met during the year covered by this statement are set out below.

4.3 The Trustee has a rolling program of training requirements to cover legislative changes, Scheme specific events, conversance with Scheme documentation and general pensions and trust law. During the Scheme year, each of the Trustee Directors attended training, examples of which included:

- Pension Dashboard
- Effective System of Governance (TPR General Code)
- Own Risk Assessment (ORA)
- DC Investment Monitoring framework
- Task Force on Climate Related Disclosures (TCFD)
- Cyber Security
- Actuarial Factor review and SMPI Assumptions
- Surplus distribution

4.4 Trustee knowledge and understanding and training requirements are assessed through Trustee training by the Scheme Actuary and other Advisors, as appropriate, and self-assessment questionnaires (produced and analysed by the Scheme's Investment and Actuarial adviser). The questionnaires were completed by Trustee Directors in October 2025 with the results discussed at the Trustee meeting held on 27 November 2025. The questionnaires covered (amongst other areas):

- Governance and Administration covering the following:
 - Policy on the appointment of the Chair
 - Memorandum and Articles of Association for corporate trustee
 - Terms of Reference for the Chair of the Trustees
 - Scheme Trust Deed & Rules
 - Company's Business Continuity Plan (BCP)
 - Pension Regulators guidance on equality, diversity, and inclusion for pension schemes
 - Compliance with the Pensions Regulator's General Code
- Funding and Actuarial covering the following:
 - Impact of member transfers into the Scheme on defined benefit funding
 - How a scheme surplus may be utilised.
 - The role and purpose of surplus framework.
- Investment covering the following key areas:
 - Investment Advisor Objectives requirements
 - General financial markets including overseas investment
 - Principles of fund management and how performance can be measured
 - Reporting required in line with the Taskforce for Climate related Financial Disclosures (TCFD) recommendations

4.5 The Scheme Secretary used the output from the questionnaires to recommend appropriate additional individual and full board training requirements to supplement the rolling program of training sessions. Any additional training for the Trustee has already been included as part of the Trustee training program for the Scheme year. The Trustee is also encouraged to request training if required and the cost is met by the Scheme.

4.6 Trustee training was provided via regular training and update sessions provided by the Scheme Secretary and the Scheme's advisers. The sessions covered compliance with legal requirements, general pensions, and Scheme specific topics, developing a working knowledge of the Trust Deed and Rules and other key Scheme documents and specifically incorporated good practice in the DC Code and DC regulatory guidance.

4.7 To understand the specifics of the Scheme, Trustee Directors have access to all key Scheme documents, Trustee policies and key Scheme information. This includes the Trust Deed and Rules of the Scheme and the Statement of Investment Principles. The Trustee is legally required to have a working knowledge of these documents. All Trustee Directors are aware of the importance of these documents, and the documents are regularly covered in the context of Trustee training and the receipt of professional advice from the Trustee's appointed advisers legal, investment, actuarial and other advisers. In addition, the Trustee produces an annual Implementation Statement which sets out how the policies within the Statement of Investment Principles have been followed during the Scheme year.

The Scheme has a detailed Induction / training process for new Trustee Directors run by the Scheme Secretary and Group Pensions Technical & Compliance Manager which strongly suggests completion of the Pension Regulator's Trustee Toolkit within 6 months of appointment. The Trustee Toolkit is an online learning programme from The Pensions Regulator aimed at helping new trustees of occupational pension schemes meet the minimum level of knowledge and understanding. The Trustee Directors have completed the toolkit in line with TPR requirements.

Colin Hatley was appointed as the new Executive Chair of the Trustee Board on 27 November 2025 replacing the outgoing Chair who retired from the Board. In addition, a new Scheme Secretary (Peter Morris) was also appointed at the same date replacing Colin. Due to further changes to the Trustee Board, three new Trustee Directors were appointed to the Trustee Board namely, Darren Clark on 27 November 2025, Miles McCarthy on 26 February 2026 and an Independent Trustee Director, Keith Burns on 26 February 2026

4.8 The Trustee believes that the combined knowledge and understanding of the Trustee, together with the advice which is available to it from its range of appointed professional advisers enables it to properly exercise its functions as Trustee. This is achieved by evaluating and identifying the risks critical to the Scheme and obtaining a clear understanding of the Scheme's operational procedures, applicable legal and regulatory requirements, investments, and communications. The Head of Group Pensions is delegated to monitor the performance and effectiveness of the Board against the objectives of the Scheme's business plan and to raise any concerns with the Board as they arise. Additionally, the Scheme

Investment Advisers report to the Board any concerns they may have with regard to either the investment strategy or underlying fund managers. These reviews are proactive and would include concerns not immediately obvious by way of performance, for instance change in staffing, structure, or culture at respective investment managers. The regular reviews also include consideration of potential future enhancements or changes to our strategies.

- 4.9 The Scheme Secretary and Group Pensions maintain all Trustee training records Technical and Compliance Manager and are updated quarterly following each Trustee Board meeting. The standards of practice adopted by the Trustee are in line with the General Code and regulatory guidance.
- 4.10 Taking into account the knowledge and experience of the Trustee Directors with the specialist advice (both in writing and whilst attending meetings) received from the appointed professional advisers (e.g., actuary, investment consultants, legal advisers), the Trustee Directors believe they are well placed to exercise their functions as Directors of the Scheme properly and effectively.

5. Chairman's Closing Remarks

I am pleased to confirm that all aspects of the Scheme have continued to be delivered to members and participating employers throughout the Scheme Year complying with disclosure requirements.

The Scheme has produced its very first own risk assessment report in accordance with the requirements of the Pensions Regulator's General Code which shows that its effective system of governance is operating effectively.

Following successful implementation of changes to the self-select fund range and introduction of private debt allocation into the Target Date Fund range (default investment strategy), example illustrations from both types of funds highlighting the impact of transaction costs on the fund value for members is included in this Statement.

Trustee meetings have been held in accordance with the annual calendar defined in the Trustee Business Plan & Risk Register and DC quarterly fund value monitoring, own cyber risk management, Business Continuity plans and investment of received contributions/switches/ transfers have remained top of the Trustee agenda.

Finally, I am happy to confirm that the Scheme remains compliant and there are no concerns to raise with members.

Signed for and on behalf of Associated British Foods Pension Trustees Limited

Signed for and on behalf of Associated British Foods Pension Trustees Limited

Chair

Date

10-9-26

APPENDIX 3: IMPLEMENTATION STATEMENT

Introduction

This statement sets out how, and the extent to which, the Statement of Investment Principles ('SIP') produced by the Trustee has been followed during the year to 5 April 2026 (the "Scheme Year"), whilst also covering manager engagement and voting information across the Scheme Year. This statement has been produced in accordance with The Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2019 and the statutory guidance produced by the Department for Work and Pensions.

Investment Objectives of the Scheme

The Trustee believes it is important to consider the policies in place in the context of the investment objectives they have set. The objectives of the Scheme included in the SIP are as follows:

DB Section

The Trustee believes its primary objective is to invest the Scheme assets in such a manner that it is likely that the Scheme liabilities can be met.

The estimated liabilities are a series of projected cash flows calculated using assumptions contained in the actuarial valuation. In theory, the matching assets would be a portfolio of UK government bonds that provided the projected cash flows to cover all future economic scenarios. Given the discrete number of UK government bonds available, such a combination is unlikely to exist in practice. It is nonetheless a valid reference point against which to assess investment strategies that can be implemented in practice.

In agreeing to adopt this investment objective, the Trustee has considered the Company's view that some risk should be taken to reduce the cost of providing the benefits which would be expected from adopting a fully matched investment strategy.

There is a broad target benchmark split between asset classes for the DB Section. The strategic framework including benchmarks is outlined in the Investment Implementation Policy Document ('IIPD'). Over the past few years, the Trustee has transitioned the DB Section's asset allocation to a low dependency asset allocation. This transition was completed over the Scheme year and was primarily achieved by terminating two of the Scheme's equity mandates and reallocating the proceeds to three new Public Investment Grade Credit managers. In addition, the target level of interest rate and inflation hedging has been increased over the year.

The low dependency strategy notionally splits the DB Section asset allocation between a "liability portfolio" – consisting of global credit, multi-asset credit, UK property, senior private debt, LDI and cash – and an "unallocated portfolio" – consisting of equity, opportunistic private debt and a cash buffer. The primary objective of the liability portfolio is to reduce liability interest rate and inflation risk while broadly aligning the expected liability cash-flows with the expected asset cash-flows. The portfolio has a secondary objective of generating a modest level of return to support the actuarial valuation assumptions. The objective of the unallocated portfolio is to generate additional risk-adjusted returns.

The target allocation to the liability portfolio shall be determined such that the assets within it are sufficient to fully-fund the DB Section liabilities of the Scheme on the prevailing valuation basis. Any excess assets will make-up the unallocated portfolio. This target allocation is reviewed at least annually and, if required, rebalancing action will be taken to re-align assets back to target.

When considering appropriate investments for the Scheme, the Trustee has obtained and considered the written advice of a suitability qualified investment adviser. The advice received and arrangements implemented are, in the Trustee's opinion, consistent with the requirements of Section 36 of the Pensions Act 1995 (as amended).

DC Section

The Trustee recognises that members have differing investment needs and that these may change during the course of members' working lives.

The Trustee assumes that most members do not have the knowledge or desire to manage their pension investments. The Trustee regards it as its duty to make available (as the default investment option) a fund which:

- is suitable for most members; and
- is dynamically managed; and
- has a risk and reward profile that reflects the period until its participating members reach retirement age.

The Trustee also regards its duty as making available a range of investment options sufficient to enable members to tailor their investment strategy to their own needs if they wish to do so. The Trustee has the objective of grouping these investments into 'tiers' based on the amount of member involvement required in investment management.

The investment objective of each Target Date fund (default fund) is designed and managed for an investor saving to retire in or around the years stated in its name (the "target date"). The investment manager's aim is to maximise, for a typical such investor, their eventual retirement income while taking account of their decreasing capacity to afford losses as they approach and, possibly, go past the target date of retirement. On retirement, the investor is assumed to use their built-up pension savings to provide pension income from the options available when they retire. The Target Date funds will progressively move from riskier, capital growth-oriented assets such as equities, private debt and property, into lower-risk retirement income protection-oriented assets, such as bonds, as it approaches and passes its target date. The investment manager seeks to ensure that the mix of assets remains appropriate given the Target Date Fund's aim and will also employ a dynamic asset allocation strategy which seeks to mitigate the effects of large market movements without detracting from long-term returns. The manager will manage the Target Date Funds in such a way that, for an individual investing over the whole term of each Target Date Fund, a return of beating inflation over the life of the funds is being targeted.

The Trustee also makes available a wide range of self-select funds across different asset classes and risk profiles, for members who feel comfortable making their own investment decisions.

Trustee review of the SIP for the year ended 5 April 2026

The Trustee last reviewed the SIP in May 2025. As at the Scheme year-end date, the wording included within the latest SIP remained a fair and accurate reflection of the Scheme's investment objectives and approach to management of the assets. The Trustee consulted with the Company in their review of the SIP.

The most recent SIP is available online <https://www.abfpensions.com/db/sip>

Assessment of how the policies in the SIP have been followed for the year to 5 April 2026

In the opinion of the Trustee, the SIP that was in place during the Scheme year has been followed throughout the year for both DB & DC Sections.

The information provided in this section highlights the work undertaken by the Trustee during the year for the long-term benefit of the Scheme. It also sets out how this work followed the Trustee's policies in the SIP, relating to the Scheme as a whole and the default investment arrangement. The SIP is attached as an Appendix and sets out the policies referenced below.

Requirement 1 – Securing compliance with the legal requirements about choosing investments**Detail of the Trustee's policy:**

When considering appropriate investments for the Scheme, the Trustee obtains and considers the written advice of their investment adviser. In the Trustee's opinion this is consistent with the requirements of Section 36 of the Pensions Act 1995.

How the requirements have been met over the year to 5 April 2026:

DB Section: The Trustee receives advice from its investment adviser at the quarterly Investment Sub-Committee meetings. Since the start of the year, advice was provided on a wide range of issues, including:

- A quarterly review of the performance of the DB investment managers;
- The appointment of three new Public Investment Grade Credit managers, including agreeing the investment guidelines for each manager and incorporating the interest rate exposure arising from the mandates into the Scheme's interest rate hedging.
- Funding the Scheme's future cash-flow requirements, including consideration to the expected evolution of the private debt allocation.
- Refresh of the Liability Benchmark Portfolio ("LBP"), used in managing Insight's LDI portfolio, to reflect latest market conditions and advice on increasing the level of interest rate and inflation hedging from 90% to 95% of the Scheme's liabilities.
- Overview of the GSAM Public Investment Grade Credit mandate, including its role in the credit portfolio.
- Analysis of the Internal Rate of Return (IRR) of the Scheme's Private Debt mandates.
- Production of the Scheme's fourth Task Force on Climate Related Financial Disclosures report, including carrying out the necessary Trustee training on additional requirements of the report.
- In depth review of the Scheme's currency hedging policy including advice to increase the level of hedging for the overseas equity assets from 30% to 50%.

DC Section: The Trustee receives advice from its investment adviser at the quarterly Investment Sub-Committee meetings, as required. Since the start of the year, advice was provided on a wide range of issues, including:

- A quarterly analysis of the performance of both the default funds and self-select funds against their benchmarks and objectives, alongside investment manager updates, valuations, and Scheme member demographic analysis. This performance analysis provides the Trustee with strong oversight of the Scheme's investment arrangements;
- Issuing 'watch list status' to funds or managers who are not achieving their objectives, resulting in additional scrutiny and Trustee consideration of the funds;
- Inputting into the Scheme's Climate Change Governance and Reporting Disclosures report;
- Training and advice around the UK Stewardship Code 2026;
- Providing additional advice in relation to the benchmark and targets used for reporting purposes for the self-select fund range.

Requirement 2 – Kinds of investments to be held**Detail of the Trustee's policy:**

DB Section: The Trustee has considered various combinations of assets and investment approaches that might minimise the required degree of risk for a level of return expectation consistent with the Scheme's objectives and liability profile.

DC Section: A range of asset classes are included within the default investment option (within the blended funds used), including developed market equities, emerging market equities, private debt, money market investments, and pre-retirement funds. It is the Trustee's policy to utilise both active and passive management within the default investment option, depending on the asset class.

The Trustee has also made available a range of individual self-select fund options for investment in addition to the default investment option. A range of asset classes have been made available, including equities, diversified growth funds, money market investments, gilts, index-linked gilts, corporate bonds and pre-retirement funds. It is the Trustee's policy to offer both active and passive management self-select fund options to members where appropriate, depending on the asset class.

How the requirements have been met over the year to 5 April 2026:

DB Section: On a quarterly basis, the Trustee reviewed its investment strategy. In determining their appetite for risk (including financially material risks such as Environmental, Social and Governance risks, including climate change) the Trustee considers the Scheme's liability profile, the requirements of the Statutory Funding Objective, the Sponsoring Employer's appetite for risk, and the strength of the Sponsoring Employer's covenant.

Over the course of the Scheme year the Trustee completed the transition of the investment strategy to a low-dependency portfolio. This was primarily achieved by terminating two of the Scheme's equity mandates and reallocating the proceeds to three new Public Investment Grade Credit managers. In addition, the target level of interest rate and inflation hedging has been increased over the year.

The Trustee is continuing to sell down the Scheme's UK Property and Private Debt allocations to improve liquidity and align the asset allocation to its long-term target. The UK Property allocation is expected to be fully sold off by end of 2026 whereas the Private Debt allocation is expected to continue to run-off over the next few years, with most material distributions taking place within the next 3 years.

The Trustee regards the strategic distribution of the assets under the low dependency portfolio to be appropriate for the Scheme's objectives and liability profile.

DC Section: Over the Scheme year, the Trustee has implemented additional investment oversight via reviewing quarterly performance analysis reports from Mercer, their DC Investment Adviser in order to better monitor the investment funds available to members. The next formal investment strategy review is due to be completed following the Scheme year end, in the second half of 2026.

Requirement 3 – The balance between different kinds of investments**Detail of the Trustee's policy:**

DB Section: The Trustee has considered various combinations of assets and investment approaches that might minimise the required degree of risk for a level of return expectation consistent with the Scheme's objectives and liability profile.

DC Section: Members can combine the investment funds in any proportion to achieve the desired level of return and risk in line with their own attitude towards and tolerance of risk.

Within the default option, the strategic asset allocation is set to achieve the expected return required to meet the objective of the default option.

How the requirements have been met over the year to 5 April 2026:

DB Section: The Trustee reviews the strategic asset allocation on a quarterly basis to ensure it meets its objectives based on the changing membership profile. As at the Scheme year-end the strategic asset allocation was based upon the low dependency asset allocation.

The low dependency asset allocation notionally splits the assets between a "liability portfolio" – consisting of global credit, multi-asset credit, UK property, senior private debt, LDI and cash – and an "unallocated portfolio" – consisting of equity, opportunistic private debt and a cash buffer.

The target allocation to the liability portfolio is determined such that the assets within it are sufficient to fully-fund the DB Section liabilities of the Scheme on the prevailing valuation basis. Any excess assets make-up the unallocated portfolio. This target allocation is reviewed at least annually.

In terminating two Equity managers and appointing three new Public Investment Grade Credit managers the equity allocation has reduced in favour of Public Investment Grade Credit over the Scheme year. The allocation to the new Public Investment Grade Credit managers was determined to bring the overall asset allocation in-line with low dependency portfolio's strategic asset allocation.

The Trustee has reduced their allocation to UK Property, Private Debt and Beach Point's Public sub-Investment Credit mandate to further align the asset allocation to the strategic asset allocation of the low dependency portfolio.

DC Section: The Trustee receives a quarterly investment performance report from AllianceBernstein and Mobius Life, which monitor the performance of the Target Date Funds and self-select funds. The Trustee also receives additional, detailed quarterly performance analysis from its DC Investment Adviser, Mercer. This analysis provides the Trustee with further tools to assess the ongoing suitability of the investment offering.

As the assets of the DC section are invested in pooled fund vehicles the investment restrictions applying to these funds are determined by the investment manager. The Trustee is satisfied that the investment managers' policies on investing in individual securities held in each vehicle provides adequate diversification of investments. The investments held within the Scheme are consistent with the policies in the SIP.

The Trustee is due to conduct the next triennial investment strategy review in the second half of 2026. Further information will be provided in next year's Implementation Statement.

Requirement 4 – Risks, including the ways in which risks are to be measured and managed

Detail of the Trustee's policy:

DB Section: The degree of investment risk the Trustee is willing to take depends on the financial health of the DB Section and its liability profile. The Trustee monitors these with a view to altering the investment objectives, risk tolerance and/or return target should there be a significant change in either. The Trustee also regularly considers the strength of the Employer covenant and factors this into the level of risk being considered.

DC Section: The Trustee recognises risk (both investment and operational) from a number of perspectives in relation to the self-select fund options and the default investment option and that the choice and allocation of investments can help to mitigate these risks.

Risk is not considered in isolation, but in conjunction with expected investment returns and retirement outcomes for members. In designing the default option, the Trustee has explicitly considered the trade-off between risk and expected returns.

How the requirements have been met over the year to 5 April 2026:

DB Section: As detailed in the risk table in the SIP, the Trustee considers both quantitative and qualitative measures for these risks when deciding investment policies, strategic asset allocation, the choice of investment managers, funds and asset classes.

The Trustee reviews the investment risk of the strategy at the quarterly ISC meetings. As a result of the Trustee concluding the transition to the low dependency portfolio, the overall level of investment risk has fallen over the Scheme year, as measured by the value at risk which is reported to the Trustee by their investment advisor quarterly. The Trustee notes that, given the strong funding position of the Scheme, the investment strategy's value at risk is significantly less than the Scheme's surplus.

Interest rate and inflation risk is managed via hedging within the Insight LDI portfolio. Over the Scheme year, the Trustee undertook the decision to increase the level of hedging from 90% to 95% in order to further protect the Scheme's funding position. The hedge was extended with limited impact on the LDI portfolio's collateral position due to the inclusion of the additional interest rate sensitivity arising from the three new Public Investment Grade Credit mandates. The level of hedging delivered by Insight's LDI portfolio relative to target is monitored on a quarterly basis, with hedging found to be in-line with target over the Scheme year.

One of the key risks under the low dependency portfolio is meeting the Scheme's cash-flow needs. In September 2025 and February 2026, the Trustee reviewed the Scheme's cash-flow policy to ensure the current and expected future asset allocation would generate sufficient cash-flow to meet the Scheme's needs. This analysis considered the expected run-off of

the Scheme's private debt allocation as well as the evolution of the asset allocation following the transition to the low dependency portfolio.

The Trustee considered climate change risk as part of the scenario analysis reported within the Scheme's TCFD report. Given the funding level, the DB investment strategy demonstrated robustness with respect to the potential impact of climate change across the scenarios and time-periods considered.

Over the coming year the Trustee will continue to consider the key risk exposures of the Scheme, including its reliance upon the Sponsor and how these are best managed.

DC Section: The default investment option manages investment and other risks through a strategic asset allocation consisting of equities, multi-asset funds, private debt, bonds and money market investments. The self-select range offers different risk and return profiles across a range of funds to cater for members with different risk tolerances.

Within the latest Climate Change Governance and Reporting Disclosures report, the Trustee included the results from the 2025 scenario analysis which modelled the exposure of the default Target Date Funds to climate risk. The results of this analysis showed that younger members are expected to be significantly impacted by climate risk in the form of lower investment returns and pot sizes over the medium to long term. The potential risk to older members is materially lower, particularly those that are de-risking as they approach retirement. The Trustee also engaged with the investment manager of the default Target Date Funds, AllianceBernstein, on their climate intensity reduction target.

DB & DC Sections: The Scheme maintains a risk register of the key risks, including the investment risks. This rates the impact and likelihood of the risks and summarises existing mitigations and additional actions. In Q1 2026 the risk register was reviewed, which included the consideration of how climate risks are monitored and managed.

Requirement 5 – Expected return on investments

Detail of the Trustee's policy:

DB Section: The Trustee selected the strategic benchmark to reflect that the Scheme's liabilities would change in value in a similar manner to changes in the UK government bond markets. The Trustee expects that there will be some return premium above government bonds from non-government bonds (i.e. credit) as well as from equity and alternative investments such as property. The Trustee expects there will be periods when equities, property and credit underperform government bonds and is prepared (as is the Company) to accept and manage this risk.

DC Section: The funds available are expected to provide an investment return commensurate with the level of risk being taken.

In designing the default, the Trustee has explicitly considered the trade-off between risk and expected returns, to generate returns in excess of inflation during the growth phase and de-risk towards the retirement date to protect funds from significant falls when the timeframes to recover these losses are shorter.

How the requirements have been met over the year to 5 April 2026:

The investment performance reports from investment managers are reviewed by the Trustee on a quarterly basis.

DB Section: The Trustee reviews the expected return of the investment strategy on a quarterly basis and, otherwise, whenever considering changes to the investment strategy. In each of these reviews, the expected returns were found to be marginally behind the manager weighted performance benchmark but well in excess of the strategic benchmark, which is the performance of the technical provisions liabilities.

The investment performance reports detail how each investment manager is delivering against their specific mandates and benchmarks. The Trustee assesses the performance of all investment managers using both a qualitative and quantitative review. This also includes assessing the diversification of the portfolio in terms of asset type, geographical position and the current inflation environment.

In making the decision to terminate the Scheme's mandates with Veritas and Artemis the Trustee, amongst other factors, considered both the historical and future expected performance of these mandates relative to the other equity mandates in the portfolio.

Over the 5-years to 31 March 2026, the Scheme returned 1.6% p.a. relative to a benchmark return of 2.8% p.a. and a reduction in liability value of c. 5.4% p.a.. As such, over this period, the Scheme's assets have marginally underperformed the benchmark but significantly outperformed the change in liability value.

DC Section: The performance report which is reviewed by the Trustee on a quarterly basis includes the risk and return characteristics of the default and the self-select fund options.

The Trustee assesses the growth of the funds by monitoring the funds against their objectives and also versus inflation and equity volatility.

Over the Scheme year, the Trustee has been receiving additional quarterly performance analysis reports from its DC Investment Adviser, Mercer. This analysis includes red amber green ("RAG") ratings of the fund performance against benchmark and target across short- and long-term periods, additional investment manager and fund level monitoring, and member demographic analysis.

Requirement 6 – Realisation of investments

Detail of the Trustee's policy:

DB Section: The Trustee considers the liquidity of the investments in the context of the likely needs of member benefits.

DC Section: The Trustee's administrators will realise assets following member requests on retirement or earlier where required.

How the requirements have been met over the year to 5 April 2026:

DB Section: Most years, due to the maturity of the Scheme, a combination of investment income and asset disinvestments have been to meet benefit payments, fund capital calls for the private debt programme or to meet margin calls for the currency hedge programme.

The Trustee recognises that there is liquidity risk in holding assets that are not readily marketable and realisable. Given the long-term investment horizon of the Scheme, the Trustee believes that a degree of liquidity risk is acceptable because it expects to be rewarded for assuming it. The low dependency portfolio is designed to be sufficiently liquid to meet these potential cashflow requirements under stressed scenarios.

Whilst certain assets are illiquid (particularly the Property and Private Debt assets), the Trustee has developed strategies for daily liquidity. The diverse asset allocation contains both liquid and illiquid assets to ensure all financial obligations can be met. In addition, the continued sale of the Scheme's UK property assets and run-off of the Private Debt portfolio is expected to increase the liquidity of the Scheme.

In the normal course of events, if a disinvestment is required, the Trustee takes the decision to source the liquidity based on the asset allocation.

The Trustee continually reviews the future cash-flow generation of the Scheme, reviewing over the Scheme year in September 2025 and February 2026. These reviews showed that the Scheme's expected cash-flow needs could be met by net cash-flow generated from the private debt portfolio, cash realised from the sale of the UK property assets and income generated from the Scheme's public market assets over the coming years.

DC Section: The Trustee receives an administration report on a quarterly basis to ensure that core financial transactions are processed within SLAs and regulatory timelines. As confirmed in the DC Chair Statement, the Trustee is satisfied that all requirements were met throughout the year with 100% of the SLAs being met.

All funds invest in daily priced pooled investment vehicles, accessed by an insurance contract. This means that the Trustee can readily have access to the cash to settle member obligations. The Trustee therefore has no concerns regarding the liquidity of any of the Scheme's assets.

Requirement 7 – Financially material considerations over the appropriate time horizon of the investments, including how those considerations are taken into account in the selection, retention and realisation of investments

Detail of the Trustee's policy:

DB and DC Section common policies: The Trustee considers financially material considerations in the selection, retention and realisation of investments. Consideration of factors such as ESG is delegated to the investment managers. Investment managers are expected to evaluate these factors, including climate change considerations, then exercise voting rights and stewardship obligations attached to the investments in line with their own corporate governance policies and current best practice.

Items listed in Sections 4.2, 4.3, 4.4, 4.5 and 5.2 of the SIP are in relation to what the Trustee considers "financially material considerations".

How the requirements have been met over the year to 5 April 2026:

DB & DC Sections: The Trustee monitors and reviews the performance of their appointed investment managers on a quarterly basis. The Trustee also considers manager's ratings from the Trustee's investment adviser. All of the investment managers remained highly rated by either the investment adviser or the Investment Committee during the year.

Where investment managers may not be considered to integrate ESG into their investment process at an acceptable level for their mandate, the Trustee will engage and closely monitor the investment manager. When implementing a new investment manager, the level of ESG integration is considered.

Over the Scheme year the Trustee produced the Scheme's fourth annual TCFD report, in which it considers the Scheme's exposure to climate risk, through climate related scenario modelling. The Trustee sets carbon intensity reduction targets for the DB Section's aggregate equity and fixed income portfolios (including the public investment grade credit portfolio), and the DC Target Date Funds for the DC Section. These targets were revised and updated in the most recent edition of the report for the DB Section, following the investment into the three new Public Investment Grade Credit mandates in the DB Section of the Scheme. As part of the selection process for these mandates the Trustee's considered the level of ESG integration in the strategy and if the managers could support the Trustee's climate reduction targets.

In producing the TCFD report, climate related metric data and developments of these metrics was collated, reviewed and reported. Over the year the Trustee has seen an improvement in data coverage across both public mandates and private debt mandates.

To improve its understanding, the Trustee has undertaken investment training on the latest TCFD reporting requirements and the UK Stewardship Code. This training was provided by the Trustee's investment adviser in the November 2025 Investment sub-Committee meeting.

Scenario analysis for both the DB and DC Sections was refreshed over the year. For the DB Section, the analysis indicates resilience to climate risk given the strong funding position and low-risk investment strategy, with the funding position remaining robust across the time horizons and scenarios considered. For the DC Section, the analysis suggests younger members are more exposed to climate risk through the potential for lower long-term investment returns and smaller pot sizes, while the impact on older members is expected to be materially lower—particularly for those de-risking as they approach retirement.

The Trustee's policy on ESG factors, stewardship and climate change are reviewed regularly and documented in the Scheme's SIP, which is reviewed at least annually. The Trustee's policy on exercising of ownership rights (including engagement and voting rights) is to delegate responsibility to the investment managers but acknowledge that any actions taken by the investment managers are on the Trustee's behalf.

The Trustee acknowledges that investment managers in fixed income may be less likely to have a high level of ESG integration due to the nature of the asset class, where it is harder to engage with the issuer of debt.

Requirement 8 – The extent (if at all) to which non-financial matters are taken into account in the selection, retention and realisation of investments

Detail of the Trustee's policy:

DB and DC Section common policies: Non-financial matters are taken into consideration by the Trustee.
How the requirements have been met over the year to 5 April 2026:

DB & DC Sections: Each quarter the Trustee considers both quantitative and qualitative analysis provided by its investment adviser. This includes detailed analysis of the market cycle to identify opportunities for future investment or risk reduction measures. The Trustee also periodically reviews the appropriateness of offering individual ESG or sustainable investment choices to members.

Requirement 9 – The exercise of the rights (including voting rights) attaching to the investments

Detail of the Trustee's policy:

DB and DC Section common policies: Investment managers are expected to evaluate these factors (including climate change considerations), exercise voting rights and stewardship obligations attached to the investments in line with their own corporate governance policies and current best practice.

How the requirements have been met over the year to 5 April 2026:

DB & DC Sections: The Trustee has delegated its voting rights to the investment managers.

Investment managers are expected to provide voting summary reporting on a regular basis, at least annually, which includes details of the voting activity of relevant managers, highlighting the most significant votes. The reports are reviewed by the Trustee to ensure that they align with the Trustee's policy.

The Trustee has engagement priorities, which are detailed later in this report and in the SIP, and a definition of what they consider to be significant votes based upon these priorities. An overview of engagement activities is provided later in this Statement.

Requirement 10 – Undertaking engagement activities in respect of the investments (including the methods by which, and the circumstances under which, the Trustee would monitor and engage with relevant persons about relevant matters).

Detail of the Trustee's policy:

DB and DC Section common policies: Investment managers are expected to evaluate these factors, including climate change considerations, and exercise voting rights and stewardship obligations attached to the investments in line with their own corporate governance policies and current best practice. As part of this monitoring, the Trustee may engage with the Scheme's investment managers where appropriate to understand the activity undertaken in relation to the Scheme's engagement priorities. The Trustee has determined its own engagement priorities which are outlined later in this Statement. Outside of those exercised by investment managers on behalf of the Trustee, no other engagement activities are undertaken.

How the requirements have been met over the year to 5 April 2026:

DB & DC Sections: Investment managers are expected to provide reporting on a quarterly basis and on an annual basis are expected to provide stewardship monitoring results. These are reviewed by the Trustee to ensure that the investment managers are complying with their obligations.

As the Scheme invests in certain pooled funds, the Trustee requires their investment managers to engage with the investee companies on its behalf.

The Trustee believes its investment managers are voting responsibly on their behalf and in line with the Trustee's investment policy.

Requirement 11 – How the arrangement with the investment managers incentivises the investment managers to align their investment strategies and decisions with the Trustee's policies mentioned in sub-paragraph (b) of the legislation (2-8 of this Statement).

Detail of the Trustee's policy:

DB and DC Section common policies: The Trustee's policy on aligning investment manager appointments with the investment strategy is set out in Section 10 of the SIP.

Investment managers are chosen based on their capabilities and, therefore, their perceived likelihood of achieving the expected return and risk characteristics required for the selected asset class.

Where the Trustee invests in certain pooled investment vehicles, it accepts that they have no ability to specify the risk profile and return targets of the investment manager, but appropriate mandates can be selected to align with the overall investment strategy.

How the requirements have been met over the year to 5 April 2026:

DB Section: The Trustee continually reviews and amends the mandate for each investment manager where appropriate. Benchmarks are established for each investment manager against which performance is monitored.

In appointing the new Public Investment Grade Credit managers, the Trustee worked with its investment adviser and the managers to develop appropriate objectives, benchmarks and guidelines.

There is a broad target benchmark split between asset classes for the DB Section. The strategic framework including benchmarks is outlined in the IIPD.

DB & DC Sections: The Trustee continually meets with the investment managers to challenge decisions made including voting history and engagement activity to ensure best performance over the medium to long term.

The investment managers are aware that their continued appointment is based on their success in delivering the mandate for which they have been appointed. If the Trustee is dissatisfied, then it will consider replacing the investment manager.

Requirement 12 – How the arrangement incentivises the investment managers to make decisions based on assessments about medium to long-term financial and non-financial performance

Detail of the Trustee's policy:

DB and DC Section common policies: The Trustee's policy in relation to incentivising investment managers to consider long-term financial and non-financial performance is set out in section 11 of the SIP.

The Trustee regularly meets with its investment managers and challenges their strategic policies. The Trustee regularly reviews the decisions made by its investment managers and can challenge such decisions to try to ensure the best long-term performance over the medium to long term. Investment managers are aware that their continued appointment is based on their success in delivering the mandate for which they have been appointed to manage. If the Trustee is dissatisfied, then it will look to replace the investment manager.

How the requirements have been met over the year to 5 April 2026:

DB & DC Sections: The Trustee met with eight of their investment managers at Investment Committee or Trustee Board meetings during the year to discuss matters such as their mandates, performance and appetite for risk. The Trustee delegates authority to senior management of the pensions department to regularly meet on an ongoing basis with its investment managers to discuss the contractual arrangements they have in place, to ensure they continue to incentivise the investment managers to make decisions based on medium to long term financial and non-financial

performance. This ensures each investment manager's target performance is consistently reviewed to match the Trustee's objectives.

Requirement 13 – How the method (and time horizon) of the evaluation of the investment managers' performance and the remuneration for asset management services are in line with the Trustee's policies mentioned in sub-paragraph (b) of the legislation (2-8 of this Statement).

Detail of the Trustee's policy:

DB and DC Section common policies: The Trustee recognises its time horizon is a long-term proposition as set out in Section 12 of the SIP. As such investment managers are assumed to be held for a suitably long time. Investment managers' performance net of fees is therefore reviewed over both short and long-term horizons. Remuneration is agreed ahead of the investment manager appointment and is reviewed on a regular basis.

How the requirements have been met over the year to 5 April 2026:

DB & DC Sections: The Trustee receives both DB and DC investment performance reports from its investment adviser on a quarterly basis, which present performance information over 1-quarter, 1-year, 3-year, 5-year periods and since inception. As well as considering each investment managers style over the course of an economic cycle, the Trustee reviews absolute performance and in many cases relative performance against a suitable index used as a benchmark. Investment managers are also monitored constantly for qualitative as well as quantitative performance, with a focus on the long-term strategy of the Trustee whilst being mindful of short-term returns.

The investment managers are generally remunerated by way of a fee calculated as a percentage of assets under management. This fee basis is reviewed with each investment manager as part of the informal reviews carried out by senior members of the pensions management team. Following the fee review that took place in the previous Scheme year, the Trustee have since negotiated improved fee arrangements for one of their investment managers, with the remaining found to have fee rates in-line with or more preferable than the market averages.

Requirement 14 – How the Trustee monitors portfolio turnover costs incurred by the investment managers, and how it defines and monitors targeted portfolio turnover or turnover range.

Detail of the Trustee's policy:

DB and DC Section common policies: The Trustee's policy in relation to the monitoring of portfolio turnover costs is set out in Section 14 of the SIP.

How the requirements have been met over the year to 5 April 2026:

DB & DC Sections: The Trustee asks its investment managers to provide portfolio turnover and turnover costs in their presentations to the Trustee.

The Trustee also receives MiFID II reporting from its investment managers. All reporting is analysed to ensure consistency between reporting periods and any inconsistencies are investigated with the investment manager.

DC Sections: DC transaction costs are disclosed in the annual DC Chair's Statement. The transaction costs for each fund covers the buying, selling, lending and borrowing of the underlying securities in the fund. An investment manager can also factor in anti-dilution mechanisms into the total transaction costs.

The Trustee is required to assess these costs for value on an annual basis. However, at present, the Trustee notes a number of challenges in assessing these costs:

- No industry-wide benchmarks for transaction costs exist.
- The methodology leads to some curious results, most notably "negative" transaction costs.
- Explicit elements of the overall transaction costs are already considered when investment returns are reported, so any assessment must also be mindful of the return side of the costs.

As noted in the most recent Chair's Statement, dated 5 April 2026, there is little flexibility for the Trustee to impact transaction costs as they invest in pooled funds. While the transaction costs provided appear to be reflective of costs expected of various asset classes and markets that the Scheme invests in, there is not yet any "industry standard" or universe to compare these to. As such, any comments around transaction costs at this stage can only be viewed as speculative. However, the Trustee will continue to monitor transaction costs on an annual basis and assess these costs for value. In particular, the Trustee does undertake charging and cost comparisons with other large pension schemes with publicly available data.

Requirement 15 – The duration of the arrangement with the investment managers

Detail of the Trustee's policy:

DB and DC Section common policies: There is no set duration for the investment manager appointments, with the exception of Private Debt managers. All appointments are regularly reviewed as to their continued suitability and could be terminated either because the Trustee is dissatisfied with the investment manager's ongoing ability to deliver the mandate promised or because of a change of investment strategy by the Trustee.

For Private Debt managers, at the time of appointment the life of the fund is established, however this could be extended in line with the IMA.

How the requirements have been met over the year to 5 April 2026:

DB Section: All investment managers agreements, except for the Private Debt managers, have no set duration.

As at 5 April 2026, the Trustee is currently invested in 26 private debt funds using a series of vintages via LLP structures for a defined number of years. In accordance with the IMA each Fund can extend the lifetime of the fund for a prescribed time period.

DC Section: The DC investment manager appointments have no set duration. However, if the Trustee is not satisfied with an investment manager, it will ask the investment manager to take steps to rectify the situation. If the investment manager still does not meet the Trustee requirements, the Trustee will remove the investment manager and appoint another after taking advice and following necessary due diligence.

The available fund range and default investment options are reviewed on at least a triennial basis. An investment manager's appointment may be terminated if it is no longer considered to be optimal and does not have a place in the default strategy or general fund range. The next review is due following Scheme year end in the second half of 2026. The full range of self-select funds is available online at www.abfpensions.com/defined-contribution-section-abf/investments/self-select-funds/.

Engagement and Voting

Voting Policy

The Trustee's policy is to delegate responsibility for exercising of ownership rights (including engagement and voting rights) to the investment managers but acknowledge that any actions taken by the investment managers are on the Trustee's behalf and accept responsibility on those actions.

Engagement Priorities

The Trustee's engagement priorities are based on its belief that ESG issues, across each of the three factors, may have a material impact on investment performance. As such the Trustee has determined what it considers the most salient topic within each of the three ESG factors, as listed below.

Engagement Priority	Rational
Environment: Climate Change	Climate-related financial impacts are driven by the associated transition to a low-carbon economy and the physical damages of different climate outcomes. The Trustee believes climate change issues present risks and opportunities that increasingly may require explicit consideration.
Social: Human rights including modern Slavery	Workforce and supply chain safety and human rights practices should avoid contributing to modern slavery, exploitation and other human rights abuses – these can contribute to economic instability, the threat of social tension and subsequent political instability which, in turn, may have a negative impact on investment performance. The Trustee notes alignment of this priority with the Company's Supplier Code of Conduct and the commitments made therein.
Governance: Executive remuneration	Executives have significant influence over the financial success of the companies which they manage. Therefore, executive remuneration policies can have a meaningful impact on the return of investors in companies. These policies should attract and retain talent whilst ensuring alignment of incentives with company and shareholder objectives.

Significant Votes

The Trustee considers a vote to be most significant if the holding makes up more than 2% of the relevant fund's value and:

- It relates to any of the Trustee's engagement priorities, as set out above; or
- It has a direct financial impact on the company.

Any vote on exposures that make up more than 5% of the relevant fund are also considered most significant, irrespective of the purpose of the vote. The Trustee reports on the most significant votes later in this report.

Engagement and Ownership for DB Investment Strategy

The investments within the DB Investment strategy are segregated between investment managers with equity, bond, property and derivative portfolios. Each investment manager that holds equity in their portfolio is responsible for engaging with the companies within which they invest, as well as exercising the attached ownership rights (i.e. voting powers), to influence corporate policies/behaviours and hold company management to account. The Trustee monitors third-party investment managers' policies and actions to ensure that they align as closely as possible with those of the Trustee. Some managers within the bond portfolio also hold investments that have voting right attached to them and are expected to carry out engagement activities, to the extent possible, these managers are also reported below:

Manager	Engagement	Voting
Artemis	Artemis' Smart Garp quantitative investment approach means engagement with companies does not form part of their investment process. Rather, insights gleaned from novel datasets are designed to help capture favourable ESG characteristics for companies. This data driven approach ensures the process is consistent in remaining evidence based. ESG is one of eight factors considered by the framework. The inputs to this factor consist of metrics focused on companies' carbon footprints and ESG news flow sentiment	99 meetings eligible to vote at 1,542 total proposals eligible to vote on 100% of eligible votes were cast 92% of votes were with management recommendations 7% of votes were against management 1% of votes were abstained from - In 48% of meetings at least one vote was cast against management
Beachpoint	- Engaged with 11 Issuers 12 total recorded engagements - The primary engagement topics are split as follows: 15.4% environmental matters 0% on social matters 84.6% on governance matters	5 meetings eligible to vote at 40 total proposals eligible to vote on 100% of eligible votes were cast 77.5% of votes were with management recommendations 0% of votes were against management recommendations 22.5% of votes were abstained from 0% of meetings at least one vote was cast against management
Calamos	78 total recorded engagements - The primary engagement topics are split as follows: 19.2% environmental matters 48.7% on social matters 32.1% on governance matters	44 meetings eligible to vote at 724 total proposals eligible to vote on 100% of eligible votes were cast 99.4% of votes were with management recommendations 0.6% of votes were against management recommendations 0.0% of votes were abstained from - In 9.1% of meetings at least one vote was cast against management
Capital Group	113 total recorded engagements - The primary engagement topics are split as follows: 15% environmental matters 11% on social matters 71% on governance matters	N/a

Company	Engagement	Voting
	43% Other	
CQS	- Engaged with 54 different corporate issuers and banks 57 total recorded engagements - The primary engagement topics are split as follows: 43% environmental matters 24% on social matters 34% on governance matters	28 total proposals voted 100% of eligible votes were with management recommendations
Liontrust	Engaged 3 fund holdings. Of these 3 engagements, 37.5% were on environmental issues, 37.5% were on social issues, and 25% were on governance issues (some engagements had more than one area covered.)	40 meetings eligible to vote at 814 total proposals eligible to vote on 86.1% of eligible votes were cast 81.3% of votes were with management recommendations 4.8% of votes were against management recommendations 0.0% of votes were abstained from - In 50% of meetings at least one vote was cast against management
Loomis Sayles	12 total recorded engagements - The primary engagement topics are split as follows: 83.3% environmental matters 0% social matters 16.7% governance matters	N/a
PGIM	14 total recorded engagements - The primary engagement topics are split as follows: 62.5% environmental matters 31.3% social matters 6.3% governance matters	N/a

Manager	Engagement	Voting
Schroders*	- Engaged with 131 global companies 891 total recorded engagements - The primary engagement topics are split as follows: 55.8% environmental matters 28.2% social matters 16.0% governance matters	679 meetings eligible to vote at 9,491 total proposals eligible to vote on 94.9% of eligible votes were cast 90.2% of votes were with management recommendations 9.8% of votes were against management recommendations 0.2% of vote was abstained from - In 61.0% of meetings at least one vote was cast against management
Veritas*	3 total recorded engagements - The primary engagement topics are split as follows: 66.7% environmental matters 0% social matters 33.3% governance matters	21 meetings eligible to vote at 360 total proposals eligible to vote on 100% of eligible votes were cast 93% of votes were with management recommendations 6% of votes were against management recommendations 0% of votes were abstained from - In 42% of meetings at least one vote was cast against management

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

Specific Examples of Engagement

Engagement Example – Beachpoint

Compass Group Diversified Holdings LLC ("CODI")

The objective of this engagement was to seek to better understand and further evaluate allegations of securities fraud involving CODI and its subsidiary, Lugano Holdings, Inc., and to assess any governance or oversight lapses that might negatively impact Beachpoint's investments. The primary goal was to understand the nature of the alleged unrecorded financing arrangements and reporting discrepancies, and to monitor management's response, including any corrective actions taken.

This engagement began in May 2025 following the surfacing of lawsuit allegations and has continued through subsequent direct interactions with management. Activities have included dialogue with CODI's senior executives, Investor Relations team, and selected board members to evaluate internal controls, oversight mechanisms, and governance practices, as well as a direct management meeting during which portfolio performance, capital allocation priorities, and the status of the Lugano recovery effort were discussed.

The engagement has continued to evolve as the Lugano situation has developed. Management indicated it is actively pursuing what it estimates could be approximately \$100 million in recoveries through both civil and criminal channels, with the DOJ and FBI having been informed, though ultimate realised value remains uncertain and no particular outcome can be assured. On governance, management committed to returning approximately \$50 million in prior fees over the next 18 months and indicated an intention to reduce go-forward management fees, which the Firm views as a constructive step, though details remain to be finalised. On capital structure, the company sold an industrial business for approximately \$300 million to reduce secured debt, with management targeting below 4x leverage and characterising bank debt reduction as the primary capital allocation priority.

Beachpoint believes the engagement has contributed to a more informed internal view of CODI's governance trajectory and capital allocation priorities, though no particular outcome can be assured. The investment team intends to continue monitoring the Lugano recovery process, deleveraging execution, and any further governance improvements as the situation develops.

Engagement Examples – Capital Group

JPMorgan Chase & Co

Capital Group's ESG and Investment analysts engaged with JPMorgan to discuss sustainability and climate disclosure.

- Policy approach: Maintains a measured stance, focusing on financially material issues while preparing for evolving EU requirements such as the Corporate Sustainability Reporting Directive ("CSRD"), balanced against differing global regulations.
- Climate strategy: Continues to advance best-practice disclosure, including the Energy Supply Financing Ratio (ESFR), and supports client decarbonisation through its Climate Assessment Framework, with selective disclosure to preserve nuance.
- Industry positioning: Despite reduced momentum across parts of the U.S. banking sector, JPMorgan remains committed to climate ambition and transparency, positioning itself as a leader among global peers.

Amazon

Engagement focused on labour health and safety in fulfilment centres (FCs), given historical injury rates, regulatory scrutiny, and limited safety disclosure.

- Context: Concerns around worker safety and labour practices, alongside questions on whether automation meaningfully improves outcomes or introduces new risks.
- Action: Discussed injury rate trends in robotic vs non-robotic FCs, safety systems (incident reporting, behavioural programmes), and delivery partner metrics; also challenged limited disclosure and transparency.
- Outcome: Robotic FCs show ~15% lower injury rates, with automation reducing exposure to higher-risk tasks; enhanced safety processes and feedback mechanisms are beginning to demonstrate improvements.

Engagement Examples – CQS

Food retail company (Company name not provided)

Retail employment is highly labour competitive with increasing scrutiny placed by stakeholders on the promotion of fair and safe work environments as part of broader efforts to increase equality, inclusion and transparency of a fit for purpose human rights strategy. Managing the risks associated with employee operations and relevant risks through relevant supply chains, requires strong governance, progress monitoring and policy implementation to ensure positive impact from an industry responsible for a large workforce.

This bilateral interaction with the investor relations team and c-suite management forms part of an ongoing engagement on operational progress and human rights policy management. Notably, as it relates to staffing policy developments, including pay and recruitment, and for a human rights management update around its approach towards inclusion and ethics. The company has previously lagged industry peers on salary and employee wage growth, as referenced by independent survey data, and of which formed the grounds for union representation to voice action against the company. We also looked to attain an update on the extent of union and employee conversations on pay and working hours, which were flagged in the media earlier this year, and to share the extent of any remediation plans. In addition, we also sought an update on dialogue with its supply chain on management of competitiveness, including product availability and inflation, and the economic importance of maintaining consumer affordability.

The meeting with company management was constructive, with company representatives acknowledging recent improvement in operational and employee performance through the past financial year. In relation to recent labour challenges, the company were forced to act in response to employee strikes because of alleged equal pay issues throughout the lower tiers of its employee hierarchy, which represents a significant proportion of its workforce. While labour discussions

with unions are still ongoing at the time of our engagement, the company is confident of making progress to appease union concerns, and has increased its wages to be in line with NLW. We voiced our views on the importance of maintaining strong labour relations, and the company confirmed steps are being implemented to improve performance, including an updating of its human rights diligence and governance monitoring. This includes providing staff wages in line with proposed changes to retail base rates from September 2025, although this suggests they will remain below peers, which is an area we will continue to monitor. In addition, we articulated concerns that its human rights diligence and audits lag peers, advocating for more insight on the human rights blueprint and oversight of labour management within its operations, and on the transparency of its supply chain.

As a positive, greater disclosure was provided on its supplier code of conduct, where there are hard line commitments in areas of modern slavery and palm oil use. Management also outlined actions taken with suppliers to share and centralise data capture and visibility to improve operational effectiveness. We were however, concerned by comments regarding promotional offers and 'value' product availability, which has resulted in management looking at alternative suppliers for cost reasons as it struggles to meet consumer demand in some product categories. We will monitor developments on concerns this may compromise quality to the extent of public health and consumer perception, which could impact on financial performance.

Engagement – Liontrust

Next plc

In August 2025, Liontrust engaged with Next plc. The discussion largely centred on supply chain issues, with this being a follow-up on discussions initially held in July 2024. The engagement was prioritised due to Next's inclusion on the UN Global Compact Watch List (per MSCI) and the complexity of its global supply chain, particularly exposure to China. The main focus was on ongoing supply chain risk monitoring, a focus on labour standards and sourcing practices and continued engagement reflects the evolving nature of supply chain risks. Despite there being no immediate impact on investment decisions; the engagement supported an ongoing oversight of supply chain risk.

Engagement – Loomis Sayles

Heathrow

Heathrow is on Loomis' Engagement Focus List given the Aviation industry's challenging net zero path. Loomis believe the most material factor is Scope 3 emissions (i.e. aircraft emissions). Their targets are a minimum 2% Sustainable Aviation Fuels (SAF) usage by 2026, 11% SAF usage by 2030, and 15% CO2 reduction vs 2019 levels by 2030.

The main levers to reduce emissions are a) aircraft renewal and b) higher usage of Sustainable Aviation Fuels. Heathrow is on track to meet their main targets. SAF usage is expected to reach 11% in 2030 and CO2 emissions to decline by 15% between 2019 and 2030. However, SAF usage is unlikely to be much higher than 50% in 2050, therefore they will be utilising a chunk of the UK's future carbon budget. Fleet renewal is expected to account for half of Heathrow's 2030 CO2 emissions reduction target. Carriers are actively modernising their fleet as modern aircrafts are typically 20-25% more fuel efficient. Heathrow also provides soft incentives by publishing league tables ranking the airlines on noise and emissions. Moreover, financial incentives are provided through the structure of aeronautical charges, with Heathrow moving the charge +/- 5% depending on aircraft emissions. Finally, Heathrow believes that because most of their routes are high value routes (i.e. London-NY), airlines tend to have their best planes there. SAF usage in 2024 was 2.9%, above their 2.5% target. They are confident they will be able to meet their 2030 target (11% SAF usage).

Loomis' Senior Credit Research Analyst first met with Heathrow in 2020 to discuss their carbon emissions. The most recent engagement occurred in September 2025 with the Head of Sustainability. This engagement continued the ongoing dialogue with the company's Sustainability team to follow the progress towards their decarbonisation targets.

Heathrow has been making progress towards their emissions reduction targets. The UK government now has targets for SAF usage as well. These are 2% in 2025, 10% in 2030 and 22% in 2040. The EU targets are even more ambitious. Hydrogen is still in its early days and is not expected to contribute to the decarbonisation of the industry in any meaningful way before 2050. Loomis' analyst will continue to meet with Heathrow, and our team feels comfortable holding this issuer.

Engagement – Schroders

ASML

In Q1 2026, Schroders engaged ASML to deepen their understanding of the company's strategy across several ESG topics, including environmental delivery, cybersecurity and select social and governance matters. Within social the focus was on human capital, where ASML discussed talent attraction and retention and provided an update on the Beethoven initiative, which aims to support regional growth and infrastructure. They also provided comments on potential implications of migration policies for recruitment and wider employer brand-building in a competitive labour market.

Schroders also discussed business ethics, including whistleblowing arrangements, responsible product use considerations and diversity, as well as supply chain oversight—particularly the company's approach to conflict minerals and its engagement through the Responsible Business Alliance self assessment questionnaire process. Cybersecurity was a further area of focus, with ASML outlining preventative measures to manage both external and internal threats.

Finally, Schroders discussed the company's environmental priorities, including energy efficiency targets, how customer purchasing decisions influence energy performance, and ASML's pathway towards its 2040 net-zero ambition, including progress on renewable electricity procurement and the use of power purchase agreements. Overall, the engagement provided additional insight into how ASML is addressing sustainability risk in its operations and supply chain.

Engagement – Veritas

Zoetis

Veritas engaged with Zoetis to discuss potential breaches of their ESG Red Line proxy voting policy. Four issues were identified:

- *S4 - The level of gender diversity on the board is below 40% and has not improved compared to the previous year*
- *E3 - The company has failed to commit to introducing and disclosing science-based emission reduction targets with a coherent strategy and action plan in line with a 1.5-degree scenario*
- *G20 - Performance-based awards account for less than 50% of the total LTI awards*
- *G23 - The CEO's remuneration package does not include criteria for awards to be linked to relevant sustainability targets including those in relation to climate change.*

As part of this engagement, Veritas met with members of the Zoetis team, including Andrea Nance, Head of Sustainability. The conversation primarily centred on S4 and E3, where they felt further clarity and progress were needed beyond what had been disclosed publicly. E3: The company has set a target to achieve net zero Scope 1 and 2 emissions by 2030 and is currently working to establish Scope 3 baselines ahead of seeking SBTi validation. Zoetis acknowledged recent changes to the SBTi target-setting methodology, introduced last year, as an added challenge, a concern also echoed by other investee companies. While progress has been slower than preferred, the company has shown clear intent and a willingness to engage. As new shareholders, Veritas intend to revisit this issue following the release of the 2025 sustainability report and would expect, at a minimum, the establishment of a full carbon inventory for Scope 3 by the next AGM, which Veritas note as the next formal milestone. S4: Board gender diversity remains at 33% and has not improved. While this falls short of Veritas' 40% threshold, they acknowledge the influence of the current U.S. political climate and increasing resistance to diversity mandates. The company is led by a female CEO, Kristin Peck, and Veritas found no indication of broader gender imbalance. On this basis, Veritas did not vote against management but will continue to engage.

Regarding G20 and G23, although these were not the primary focus of the meeting, Veritas noted that Zoetis' LTI structure allocates 50% to performance share units (PSUs) tied to three-year TSR versus the S&P 500. Due to underperformance, the performance fell below the 25th percentile, the PSU payout for 2022–2024 was zero. Veritas are satisfied that the structure provides a meaningful link between pay and performance. While the CEO's remuneration package does not include explicit sustainability targets, the annual incentive plan reflects strategic and operational priorities, including environmental and community initiatives. As G23 was only introduced into Veritas' policy in 2024 and ESG-linked pay remains an evolving area, Veritas supported management while continuing to monitor progress. They remain committed to ongoing engagement to drive improvements on material ESG issues.

Engagement and Ownership for DC Default Strategy

The investments within the default strategy are accessed via third-party investment funds - most are managed by Amundi, Northern Trust, BlackRock and AllianceBernstein ("AB"). These investment managers are responsible for engaging with the companies within which they invest, as well as exercising the attached ownership rights (i.e. voting powers), to influence corporate policies/behaviours and hold company management to account. AB monitors third-party investment managers' policies and actions to ensure that they align as closely as possible with their own. AB meet with each manager quarterly on ESG including on the topic of Stewardship. They receive their voting data quarterly and are increasingly also receiving detailed engagement content.

Overleaf are the latest available summary statistics of the investment managers' engagement and voting track records.

Manager	Engagement*	Voting
BlackRock	- Engaged with 1,811 global companies 2,373 total recorded engagements - The primary engagement topics are split as follows: 12% environmental matters 13% social matters 75% governance matters	3,924 meetings eligible to vote at 42,099 total proposals eligible to vote on 99% of eligible votes were cast 93% of votes were with management recommendations 6% of votes were against management recommendations 0% of votes were abstained from - In 32% of meetings at least one vote was cast against management
Amundi	- Engaged with 2,362 global companies 9,445 total recorded engagements - The primary engagement topics are split as follows: 47% environmental matters 23% social matters 30% governance matters	2,459 meetings eligible to vote at 30,342 total proposals eligible to vote on 99.5% of eligible votes were cast 81.3% of votes were with management recommendations 13.6% of votes were against management recommendations 5.2% of votes were abstained from - In 51.3% of meetings at least one vote was cast against management
Northern Trust	- Engaged with 75 global companies 469 total recorded engagements - The primary engagement topics are split as follows: 4% environmental matters 29% social matters 67% governance matters	456 meetings eligible to vote at 5,728 total proposals eligible to vote on 100% of eligible votes were cast 93.9% of votes were with management recommendations 5.1% of votes were against management recommendations 0.2% of votes were abstained from - In 36.6% of meetings at least one vote was cast against management
Alliance Bernstein	- Engaged with 4 global companies 4 total recorded engagements - The primary engagement topics are split as follows: 30% environmental matters 38% social matters	24 meetings eligible to vote at 348 total proposals eligible to vote on 100% of eligible votes were cast 96% of votes were with management recommendations

- 32% governance matters
 - 2% of votes were against management recommendations
 - 2% of votes were abstained from
 - In 13% of meetings at least one vote was cast against management

*Engagement statistics based on latest available data. Amundi engagement statistics are to 31 March 2026.

Voting and engagement metrics cover the year to 31 December 2025, unless otherwise stated, and represent the aggregate of BlackRock, Northern Trust, Amundi and AllianceBernstein exposures held by AllianceBernstein, not only the underlying funds that the ABF Target Date Funds invest in. The ABF Target Date Fund is an investment vehicle that invests in a range of different assets that evolve over time in terms of a risk/return profile, targeting a retirement age of 65 in the default case. Source: BlackRock, Northern Trust, Amundi, AllianceBernstein.

Specific Examples of Engagement Activity

Engagement – Amundi

Advanced Micro Devices Inc. – Amundi engaged with the company regarding its climate transition plan, including its transition towards a low carbon economy and net zero. Amundi raised the issue with the company and the company provided acknowledgement.

Engagement – BlackRock

First Pacific – At the July 2025 AGM, First Pacific had in place three of five independent non-executive directors (INEDs) who had served on the Board for more than 12 years. Under the Hong Kong Corporate Governance Code and exchange listing rules, companies must have at least three independent non-executive directors (INEDs) and INEDs must constitute at least one-third of the board. BlackRock did not consider those directors to be independent due to their length of tenure. As a result, the company's board was composed of less than one-third independent directors, and several of its committees were not majority independent. BlackRock engaged with the company and assessed the proposals against its EMEA proxy voting guidelines, which emphasise the importance of board refreshment, independence, and manageable director workloads. Due to concerns about the length of director terms, insufficient board independence, and overcommitment of two directors, BlackRock voted against the re-election of the INEDs who were up for re-election (two of the three).

Engagement – Northern Trust

General Mills - The company has committed to making 100% of its packaging recyclable or reusable by 2030 and has outlined its long-term intent and governance approach to achieving this goal. As of fiscal year 2024, General Mills reports that 93% of its packaging by weight meets this criterion. However, while select data points are disclosed, the company has not publicly shared interim milestones or outcome-based metrics that would enable investors to assess progress toward its sustainable packaging commitment. Northern Trust engaged General Mills and encouraged them to evolve its disclosures over time to include metrics to strengthen investor confidence in the company's packaging strategy and provide clearer measurable progress to its 2030 packaging goal. During the engagement, General Mills highlighted several ongoing initiatives, including in-store recovery pilots for polyethylene films and a reusable steel container trial for pet food. The company also shared plans to develop an internal data platform to track packaging materials. This initiative is intended to enhance measurement capabilities and lay the foundation for improved transparency.

Engagement – AllianceBernstein

Eurazeo SE – The company intended on re-electing a supervisor board member, however AllianceBernstein believed that the nominee was incumbent and that the company was maintaining a multi-class capital structure with unequal voting rights. AllianceBernstein engaged with the company to address the capital structure concerns, noting that they will persist in holding relevant directors accountable.

Engagement and Ownership for DC Self Select Funds

Due to the number of DC Self Select Funds in the Scheme, it would not be possible to disclose all the voting information from the external investment managers in this statement and given the vast majority of assets and members (circa 98%) are invested in the Target Date Funds, the Trustee has elected to focus on these assets. The Trustee has not specified additional voting and engagement behaviours for these Funds as the voting and engagement for the Funds is outsourced for the DC Self Select Funds investment managers to carry it out.

Most Significant Votes

The Trustee's definition of a significant vote is provided in a previous section of this Statement. The most significant votes are considered to be all significant votes which meet this criteria. The table below lists the most significant votes cast over the year.

The Trustee delegates the responsibility for the exercising of voting rights attached to the Scheme's investments to their appointed investment managers. As such the Trustee do not use the direct services of a proxy voter. However, the Scheme's investment managers do utilise proxy voting providers, many of which using a custom voting policy and with final say on any votes determined by the investment manager.

Manager	Vote Information	Outcome
Artemis	Company: Alphabet Inc. Date of vote: 06/06/2025 Resolution summary: Publish a Human Rights Impact Assessment of AI Driven Targeted Advertising Reason for significance of vote: Human Rights Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 3.2%	How the manager voted: For Rationale for vote decision: An independent human rights impact assessment would strengthen the company's ability to address potential risks associated with its AI-driven advertising practices, particularly amid a recent data privacy settlement. Vote Outcome: Fail Implications: None provided
	Company: Alphabet Inc. Date of vote: 06/06/2025 Resolution summary: Provide Right to Act by Written Consent Reason for significance of vote: Human Rights Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 3.2%	How the manager voted: Against Rationale for vote decision: The ability to act by written consent is generally considered good governance. However given the ownership structure at Alphabet, the benefits do not appear to outweigh the risks, for unaffiliated shareholders. Vote Outcome: Fail Implications: None provided
	Company: Alphabet Inc. Date of vote: 06/06/2025 Resolution summary: Adjust Executive Compensation Metrics for Share Buybacks Reason for significance of vote: Executive Remuneration Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 3.2%	How the manager voted: Against Rationale for vote decision: The impacts of buybacks on metric results do not raise significant concerns at this time and, as such, performance metrics are best left to directors' discretion. Vote Outcome: Fail Implications: None provided

	Company: Alphabet Inc. Date of vote: 06/06/2025 Resolution summary: Consider Ending Participation in Human Rights Campaign's Corporate Equality Index Reason for significance of vote: Human Rights Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 3.2%	How the manager voted: Against Rationale for vote decision: "Absent any material controversies or governance failures, management should be afforded discretion to determine whether its policy positions and partnerships with certain organisations are currently appropriate. In addition, the company appears to provide shareholders with sufficient information to evaluate its oversight of the risks associated with its participation in and engagement with certain organisations. Vote Outcome: Fail Implications: None provided
	Company: Alphabet Inc. Date of vote: 06/06/2025 Resolution summary: Report on Meeting 2030 Climate Goals Reason for significance of vote: Climate Change Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 3.2%	How the manager voted: Against Rationale for vote decision: Alphabet discloses in detail its reduction strategies and initiatives for Scope 1, 2, and 3 emissions and year-over-year emissions data. In addition, the company discusses the challenges in reducing emissions in the short term, including those associated with the impact of AI and related increases in technical infrastructure investment. While incorporating certain aspects of the proponents' request into the company's current disclosures may be beneficial to interested shareholders, full implementation of the proposal does not appear necessary at this time. However, continued monitoring of the company's emissions is warranted. Vote Outcome: Fail Implications: None provided

	Company: Alphabet Inc. Date of vote: 06/06/2025 Resolution summary: Approve Recapitalisation Plan for all Stock to Have One-vote per Share Reason for significance of vote: Executive Remuneration Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 3.2%	How the manager voted: For Rationale for vote decision: The investment manager supports the adoption of a one-share one-vote structure. Vote Outcome: Fail Implications: None provided
	Company: Alphabet Inc. Date of vote: 06/06/2025 Resolution summary: Report on Due Diligence Process to Assess Human Rights Risks in High-Risk Countries Reason for significance of vote: Human Rights Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 3.2%	How the manager voted: Against Rationale for vote decision: The company appears to provide sufficient disclosures to allow shareholders to assess how it manages human rights risks. Vote Outcome: Fail Implications: None provided
	Company: Alphabet Inc. Date of vote: 06/06/2025 Resolution summary: Elect Directors L. John Doerr, K. Ram Shriram, and Robin Washington Reason for significance of vote: Executive Remuneration Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 3.2%	How the manager voted: Against Rationale for vote decision: A vote against is warranted due to concerns over poor corporate governance practices: A vote against incumbent compensation committee members John Doerr, K. Ram Shriram, and Robin Washington is warranted due to executive compensation concerns, in the absence of a say-on-pay proposal on the ballot. Vote Outcome: Pass Implications: None provided
	Company: NVIDIA Corporation Date of vote: 25/06/2025 Resolution summary: Advisory Vote to Ratify Named Executive Officers' Compensation Reason for significance of vote: Executive Remuneration Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 4.0%	How the manager voted: Against Rationale for vote decision: A vote against is warranted because the performance period is less than 3 years. The performance shares were based on non-GAAP operating income measured over a one-year performance period. Vote Outcome: Pass Implications: None provided

Calamos	Company: Amazon.com Inc Date of vote: 02/05/2025 Resolution summary: Advisory Vote on Executive Compensation Reason for significance of vote: Executive Remuneration Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.95%	How the manager voted: For Rationale for vote decision: Mapped policy based on Calamos proxy policy Vote Outcome: Approved Implications: None provided
	Company: Amazon.com Inc Date of vote: 02/05/2025 Resolution summary: Shareholder Proposal Regarding Disclosure of Material Scope 3 Emissions Reason for significance of vote: Climate Change Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.95%	How the manager voted: Against Rationale for vote decision: Mapped policy based on Calamos proxy policy Vote Outcome: Not approved Implications: None provided
	Company: Amazon.com Inc Date of vote: 02/05/2025 Resolution summary: Shareholder Proposal Regarding Climate Commitments and AI Data Centers Reason for significance of vote: Climate Change Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.95%	How the manager voted: Against Rationale for vote decision: Mapped policy based on Calamos proxy policy Vote Outcome: Not approved Implications: None provided
	Company: Amazon.com Inc Date of vote: 02/05/2025 Resolution summary: Shareholder Proposal Regarding Third-Party Assessment of Board Oversight of AI Reason for significance of vote: Human Rights Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.95%	How the manager voted: Against Rationale for vote decision: Mapped policy based on Calamos proxy policy Vote Outcome: Not approved Implications: None provided
	Company: Amazon.com Inc Date of vote: 02/05/2025 Resolution summary: Shareholder Proposal Regarding Report on Plastic Packaging Reason for significance of vote: Climate Change	How the manager voted: Against Rationale for vote decision: Mapped policy based on Calamos proxy policy Vote Outcome: Not approved Implications: None provided

	Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.95%	
	Company: Amazon.com Inc Date of vote: 02/05/2025 Resolution summary: Shareholder Proposal Regarding Report on Working Conditions Reason for significance of vote: Human Rights Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.95%	How the manager voted: Against Rationale for vote decision: Mapped policy based on Calamos proxy policy Vote Outcome: Not approved Implications: None provided
	Company: Amazon.com Inc Date of vote: 02/05/2025 Resolution summary: Shareholder Proposal Regarding Report on Risks of AI Data Sourcing Reason for significance of vote: Human Rights Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.95%	How the manager voted: Against Rationale for vote decision: Mapped policy based on Calamos proxy policy Vote Outcome: Not approved Implications: None provided
	Company: Microsoft Corporation Date of vote: 13/11/2025 Resolution summary: Advisory Vote on Executive Compensation Reason for significance of vote: Executive Remuneration Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.21%	How the manager voted: For Rationale for vote decision: Mapped policy based on Calamos proxy policy Vote Outcome: Approved Implications: None provided
	Company: Microsoft Corporation Date of vote: 13/11/2025 Resolution summary: Shareholder Proposal Regarding GenAI Discrimination Reason for significance of vote: Human Rights Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.21%	How the manager voted: Against Rationale for vote decision: Mapped policy based on Calamos proxy policy Vote Outcome: Not approved Implications: None provided
	Company: Microsoft Corporation Date of vote: 13/11/2025 Resolution summary: Shareholder Proposal Regarding Report on Risks of AI Data Sourcing	How the manager voted: Against Rationale for vote decision: Mapped policy based on Calamos proxy policy Vote Outcome: Not approved Implications: None provided

	Reason for significance of vote: Human Rights Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.21%	
	Company: Microsoft Corporation Date of vote: 13/11/2025 Resolution summary: Shareholder Proposal Regarding Report on Siting in Countries of Significant Human Rights Concern Reason for significance of vote: Human Rights Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.21%	How the manager voted: Against Rationale for vote decision: Mapped policy based on Calamos proxy policy Vote Outcome: Not approved Implications: None provided
	Company: Microsoft Corporation Date of vote: 13/11/2025 Resolution summary: Shareholder Proposal Regarding Report on AI Human Rights Due Diligence Reason for significance of vote: Human Rights Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.21%	How the manager voted: Against Rationale for vote decision: Mapped policy based on Calamos proxy policy Vote Outcome: Not approved Implications: None provided
	Company: Nvidia Corporation Date of vote: 04/06/2025 Resolution summary: Advisory Vote on Executive Compensation Reason for significance of vote: Executive Remuneration Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 4.02%	How the manager voted: For Rationale for vote decision: Mapped policy based on Calamos proxy policy Vote Outcome: Approved Implications: None provided
	Company: Samsung Electronics Co Ltd Date of vote: 27/02/2026 Resolution summary: Directors' Fees Reason for significance of vote: Executive Remuneration Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 3.70%	How the manager voted: For Rationale for vote decision: Mapped policy based on Calamos proxy policy Vote Outcome: Approved Implications: None provided

Liontrust	Company: Microsoft Corporation Date of vote: 05/12/2025 Resolution summary: Shareholder proposal on Human Rights Risk Assessment Reason for significance of vote: Human Rights Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 3.11%	How the manager voted: For Rationale for vote decision: Shareholders would benefit from increased disclosure regarding how the company is assessing the implications of siting data centers in countries of significant human rights concern. Vote Outcome: Not Approved Implications: None provided
	Company: Serco Group Plc Date of vote: 24/04/2025 Resolution summary: Approve Remuneration Report Reason for significance of vote: Executive remuneration Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.09%	How the manager voted: Against Rationale for vote decision: A vote against this item is considered warranted as the salary of the CEO, an internal hire, is being set above that of his predecessor. Furthermore, the increase is not supported by sufficient rationale, considering the resulting salary level's competitive positioning against the FTSE 250. Vote Outcome: Approved Implications: None provided
	Company: Hermes International SCA Date of vote: 30/04/2025 Resolution summary: Authorise Repurchase of Up to 10 Percent of Issued Share Capital Reason for significance of vote: Executive remuneration Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.90%	How the manager voted: Against Rationale for vote decision: This resolution warrants a vote against as the share repurchase program can be continued during a takeover period. Vote Outcome: Approved Implications: None provided
	Company: Renault SA Date of vote: 30/04/2025 Resolution summary: Approve Compensation Report of Corporate Officers Reason for significance of vote: Executive remuneration Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.34%	How the manager voted: Against Rationale for vote decision: A vote against this remuneration report is warranted because the board response to shareholders' dissent expressed over the last three years regarding the remuneration practices may not be seen compelling enough. It remains difficult to assess whether it considered minority shareholders' discontent in the past and or answers their current expectations. Vote Outcome: Approved Implications: None provided
	Company: Telefonaktiebolaget LM Ericsson Date of vote: 31/03/2026	How the manager voted: Against Rationale for vote decision: A vote against this item is warranted as the fees are annually increased without a compelling supporting

	Resolution summary: Approve Remuneration of Directors in the Amount of SEK 5.2 Million for Chair and SEK 1.4 Million for Other Directors; Approve Remuneration for Committee Work Reason for significance of vote: Executive remuneration Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.67%	rationale, while already being considered significantly above market peers. Vote Outcome: Approved Implications: None provided
Veritas	Company: Charter Communications, Inc. Date of vote: 22/04/2025 Resolution summary: Elect Director John D. Markley, Jr. Reason for significance of vote: Climate Change Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 3.0%	How the manager voted: For Rationale for vote decision: The company has failed to commit to introducing and disclosing science-based emission reduction targets with a coherent strategy and action plan in line with a 1.5-degree scenario. The company has failed to disclose quantitative and qualitative environmental information through CDP's climate change, water and forests questionnaires. Vote Outcome: Pass Implications: None provided
	Company: Unilever plc Date of vote: 30/04/2025 Resolution summary: Approve Remuneration Report Reason for significance of vote: Greater than 5% of fund's holdings Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 5.4%	How the manager voted: Against Rationale for vote decision: ISS's research makes two objections, the first of which Veritas disagree with but the second Veritas agree upon. The first relates to the base salary awarded to new CEO Fernando Fernandez, previously CFO. Overall, we don't find his proposed compensation to be inappropriate and even ISS' own analysis shows total pay for the outgoing CEO (whose salary was slightly higher than Fernandez will receive) was 0.76x the median of peers. ISS also suggests his pay increase should be staggered, which we disagree with. If he is deemed qualified to become CEO, he should be paid as such. We think he is indeed well qualified and a good appointment. ISS' second objection is that former CEO Alan Jope and former CFO Graeme Pitkethly will receive PSP awards for the 2022-24 (Jope) and 2022-24 + 2023-25 (Pitkethly) plans that will not be pro-rated for time served. The justification given is they are both treated as good leavers and the PSP rules allow for some discretion to do this. We find this unacceptable and will therefore vote against Item 2. Operating and share price performance were disappointing under these executives and Jope was awarded a generous severance package. Shareholders are

		effectively being asked to pay twice for two sets of CEO/CFOs over the same period, one set of whom delivered underwhelming results. Vote Outcome: Pass Implications: None provided
	Company: Unilever plc Date of vote: 30/04/2025 Resolution summary: Authorise Issue of Equity Reason for significance of vote: Greater than 5% of fund's holdings Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 5.4%	How the manager voted: Against Rationale for vote decision: Consistent with our vote last year, Veritas would like management to focus on improving organic operating performance. The ability to issue up to ¼ of the share count without shareholder approval opens up the possibility of issuing very large quantities of what we considered undervalued stock to fund substantial M&A. The company says it has no present intention of exercising the authority other than to satisfy employee share schemes, in which case ¼ is a far greater authorisation than necessary. Vote Outcome: Pass Implications: None provided
	Company: Unilever plc Date of vote: 30/04/2025 Resolution summary: Authorise Issue of Equity without Pre-emptive Rights Reason for significance of vote: Greater than 5% of fund's holdings Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 5.4%	How the manager voted: Against Rationale for vote decision: Consistent with the vote last year. Although proposed amounts are small (up to 5% of shares outstanding) and the authorisation expires at the next AGM, as per Item 15 we think at present it is imperative management focuses on organic operating performance and therefore see no benefit to shareholders of passing the resolutions. Vote Outcome: Pass Implications: None provided
	Company: Unilever plc Date of vote: 30/04/2025 Resolution summary: Authorise Issue of Equity without Pre-emptive Rights in Connection with an Acquisition or Other Capital Investment Reason for significance of vote: Greater than 5% of fund's holdings Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 5.4%	How the manager voted: Against Rationale for vote decision: Consistent with the vote last year. Although proposed amounts are small (up to 5% of shares outstanding) and the authorisation expires at the next AGM, as per Item 15 we think at present it is imperative management focuses on organic operating performance and therefore see no benefit to shareholders of passing the resolutions. Vote Outcome: Pass Implications: None provided
	Company: Thermo Fisher Scientific Inc. Date of vote: 21/05/2025 Resolution summary: Advisory Vote to Ratify Named Executive Officers' Compensation	How the manager voted: Against Rationale for vote decision: A vote against this proposal is warranted. Despite lowering year-over-year targets in the STI program, target bonus opportunities were not commensurately lowered and payouts were earned well-above target. The LTI program

	Reason for significance of vote: Executive Remuneration Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.7%	also largely utilizes one-year performance periods as well as an identical metric from the STI program. Further, a majority of non-CEO NEO equity was in time-vesting equity. Executives also received a one-time award and, though the award was entirely in multi-year performance equity, a portion could be earned based on one-year performance. Vote Outcome: Fail Implications: None provided
	Company: Thermo Fisher Scientific Inc. Date of vote: 21/05/2025 Resolution summary: Elect Director Nelson J. Chai Reason for significance of vote: Executive Remuneration Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 2.7%	How the manager voted: Against Rationale for vote decision: Auditors were due to be paid an amount in fees for non-audit services greater than 50% of that properly fixed as remuneration for audit work, or a breakdown of the auditor fees has not been provided. Vote Outcome: Pass Implications: None provided
	Company: Amazon.com, Inc Date of vote: 21/05/2025 Resolution summary: Advisory Vote to Ratify Named Executive Officers' Compensation Reason for significance of vote: Greater than 5% of fund's holdings Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 5.5%	How the manager voted: Against Rationale for vote decision: Performance-based awards account for less than 50% of the total LTI awards. Red Line G23 The CEO's remuneration package does not include criteria for awards to be linked to relevant sustainability targets including those in relation to climate change. In addition: A vote AGAINST this proposal is warranted. While pay to CEO Jassy was negligible in FY24, other NEOs received sizable time-vesting stock awards, with each non-CEO NEO receiving grants near or in excess of median CEO pay at peers. While it is recognised that grants are typically provided on a periodic basis and the company provides a robust rationale for its structure, it remains a significant concern that no portion of NEO compensation is directly tied to the achievement of pre-set performance criteria. Vote Outcome: Pass Implications: None provided
	Company: Amazon.com, Inc Date of vote: 21/05/2025 Resolution summary: Elect Director Jonathan J. Rubinstein Reason for significance of vote: Greater than 5% of fund's holdings Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 5.5%	How the manager voted: Against Rationale for vote decision: The company has failed to commit to introducing and disclosing science-based emission reduction targets with a coherent strategy and action plan in line with a 1.5-degree scenario. Red Line S7 The company has breached labour standards or law. Vote Outcome: Pass

		Implications: None provided
	Company: Alphabet Inc. Date of vote: 06/06/2025 Resolution summary: Elect Director John L. Hennessy Reason for significance of vote: Direct Financial Impact on Company Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 4.3%	How the manager voted: Against Rationale for vote decision: The level of gender diversity on board is below 40% and has not improved compared to the previous year. Red Line S4 Within senior leadership positions, none of the roles of Chair, CEO, Chief Financial Officer and senior independent director are held by women. In addition, A vote AGAINST Governance Committee members John Hennessy and Frances Arnold is warranted for maintaining a multi-class structure that is not subject to a reasonable time-based sunset provision. Vote Outcome: Pass Implications: None provided
	Company: Alphabet Inc. Date of vote: 06/06/2025 Resolution summary: Elect Directors K. Ram Shriram, John Doerr, and Robin Washington Reason for significance of vote: Executive remuneration Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 4.3%	How the manager voted: Against Rationale for vote decision: A vote against incumbent compensation committee members John Doerr, K. Ram Shriram, and Robin Washington is warranted due to executive compensation concerns, in the absence of a say-on-pay proposal on the ballot. Vote Outcome: Pass Implications: None provided
	Company: Alphabet Inc. Date of vote: 06/06/2025 Resolution summary: Elect Director Roger W. Ferguson, Jr. Reason for significance of vote: Climate Change Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 4.3%	How the manager voted: Against Rationale for vote decision: The company has failed to commit to introducing and disclosing science-based emission reduction targets with a coherent strategy and action plan in line with a 1.5-degree scenario. Auditors were due to be paid an amount in fees for non-audit services greater than 50% of that properly fixed as remuneration for audit work, or a breakdown of the auditor fees has not been provided. Vote Outcome: Pass Implications: None provided
	Company: Alphabet Inc. Date of vote: 06/06/2025 Resolution summary: Elect Director Roger W. Ferguson, Jr. Reason for significance of vote: Climate Change	How the manager voted: For Rationale for vote decision: A vote for this resolution is warranted, as shareholders would benefit from increased disclosure to evaluate the company's lobbying efforts. Vote Outcome: Fail

	Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 4.3%	Implications: None provided
	Company: Alphabet Inc. Date of vote: 06/06/2025 Resolution summary: Publish a Human Rights Impact Assessment of AI Driven Targeted Advertising Reason for significance of vote: Human Rights Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 4.3%	How the manager voted: For Rationale for vote decision: A vote for this proposal is warranted, as an Independent human rights impact assessment would strengthen the company's ability to address potential risks associated with its AI-driven advertising practices, particularly amid a recent data privacy settlement. Vote Outcome: Fail Implications: None provided
	Company: Aon Inc Date of vote: 27/06/2025 Resolution summary: Report on Risks of Improper Use of External Data In Development of AI Products Reason for significance of vote: Human Rights Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 3.1%	How the manager voted: Against Rationale for vote decision: Veritas is voting contrary to the Red Line policy recommendation; on the basis that the amounts specified are within the typically permitted limits and the maximum discount is 10%. Vote Outcome: Pass Implications: None provided
Amundi	Company: Digital Reality Trust, Inc. Date of vote: 06/06/2025 Resolution summary: Adopt a Policy on Human Right to Water Reason for significance of vote: Social governance Approximate Size of fund's /mandate's holding as the date of the vote (as % of portfolio): 3.2%	How the manager voted: For Rationale for vote decision: Implementing a policy on human right to water would allow shareholders to more fully assess material risks presented by the Company's core business revolving around data centers and water use, assess if practices align with stated objectives, and how the Board monitors them. Vote Outcome: Fail

Note: No significant votes were cast over the year within the DB Section of the Scheme for the following mandates:

BeachPoint, CQS, Capital Group, GSAM, Loomis Sayles, PGIM and Schroders. This is within expectations since due to the number of holdings, Schroders do not have any votes meeting the 2% threshold for a significant vote. As credit multi asset managers¹, have limited exposure to equities in their funds. For the small number of equity positions they do have, the Fund tends to hold little of the issued amounts and voting shares, and thus have fewer opportunities to cast "significant" votes. As fixed income managers, Capital Group, GSAM, Loomis Sayles and PGIM do not hold any assets with voting rights within their portfolio. The Trustee notes that the significant votes for Artemis and Veritas span between the 5 April 2025 and the date of disinvestment, while the information for Capital Group, Loomis Sayles and PGIM span from the date of investment until 5 April 2026.

Within the DC Target Date Funds BlackRock, Northern Trust, and AllianceBernstein are currently unable to provide the percentage holding in the underlying fund and so no significant votes are listed in this report for these funds.

¹ BeachPoint and CQS