

EC Harris Group Pension Scheme

Implementation Statement, covering the Scheme Year from 6 April 2025 to 5 April 2026 (the “Scheme Year”)

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

The Statement is also required to include a description of the voting behaviour during the Scheme Year by, and on behalf of, trustees (including the most significant votes cast by trustees or on their behalf) and state any use of the services of a proxy voter during that year. This is provided in Section 3 below.

In preparing the Statement, the Trustees have had regard to the [guidance](#) on Reporting on Stewardship and Other Topics through the Statement of Investment Principles and the Implementation Statement, issued by the Department for Work and Pensions (“DWP’s guidance”) in June 2022.

1. Introduction

No changes were made to the voting and engagement policies in the SIP during the Scheme Year. The last time these policies were formally reviewed was as part of the last SIP review in October 2025.

The Trustees have, in their opinion, followed the Scheme’s voting and engagement policies during the Scheme Year, by continuing to delegate to their investment managers the exercise of rights and engagement activities in relation to investments, as well as seeking to appoint managers that have strong stewardship policies and processes.

2. Voting and engagement

The Trustees have delegated to the investment managers the exercise of rights attaching to investments, including voting rights, and engagement. However, the Trustees take ownership of the Scheme’s stewardship by monitoring and engaging with managers. As part of its advice on the selection and ongoing review of the investment managers, the Scheme’s investment adviser, LCP, incorporates its assessment of the nature and effectiveness of managers’ approaches to voting and engagement.

Following the introduction of DWP’s guidance, the Trustees agreed to set stewardship priorities to focus monitoring and engagement with their investment managers on specific ESG factors. During 2023 the Trustees discussed and agreed that climate change would be the Scheme’s stewardship priority. This priority was selected as the Trustees believe that it reflects a key market-wide risk and is an area where good stewardship and engagement can improve long-term financial outcomes for the Scheme’s members. The Trustees communicated this priority to their managers and at the same time communicated the Trustees’ more general expectations in relation to ESG factors, voting and engagement. The Trustees reviewed their stewardship priority in March 2025 and agreed that it still remained appropriate.

As part of its ongoing manager research, the Trustees investment consultant assesses the investment manager’s responsible investment (“RI”) practices and awards them a score. The Trustees monitor the RI scores of the Scheme’s investment managers on a quarterly basis as part of their regular investment monitoring. The Trustees also reviewed the results of LCP’s more in-depth RI survey of investment managers in March 2025.

The Trustees are conscious that responsible investment, including voting and engagement, is rapidly evolving and therefore expects most managers will have areas where they could improve. Therefore, the Trustees aim to have an ongoing dialogue with managers to clarify expectations and encourage improvements.

3. Description of voting behaviour during the Scheme Year

All of the Trustees' holdings in listed equities are within pooled funds and the Trustees have delegated to their investment managers the exercise of voting rights. Therefore, the Trustees are not able to direct how votes are exercised and the Trustees themselves have not used proxy voting services over the Scheme Year.

The Scheme's funds that held equities as follows:

- Pyrford Global Total Return Fund; and
- Ruffer Absolute Return Fund.

Due to the full disinvestment of both pooled funds early within the Scheme year (in June 2025), we have not included voting data in this year's implementation statement.

We have included commentary on the following funds, provided by the Scheme's asset managers who don't hold listed equities, but invest in assets that may have had voting opportunities during the period:

- Alcentra European Direct Lending Fund III; and
- Arcmont Direct Lending Fund III.

3.1 Votes in relation to assets other than listed equity

The following comments were provided by the Scheme's asset managers who don't hold listed equities, but invest in assets that may have had voting opportunities during the Scheme Year:

Alcentra – European Direct Lending Fund III

As a credit manager, proxy voting is not material within the context of our activities. The number of occasions when Benefit Street Partners Limited ("BSP Ltd") will be engaged in proxy voting will be limited. It is most likely to occur with high yield bond investments, where an allocation may take on formal voting rights. In such instances, BSP Ltd uses the opportunity to vote on matters concerning governance and corporate responsibility.

BSP Ltd generally will not be called upon to vote for proxies for its syndicated loan and Direct Lending investments because of the nature of the instruments involved in the investment strategy (i.e. loans rather than securities). An exception may be when BSP Ltd holds loan investments which could be converted to voting securities.

When it has voting responsibility, BSP Ltd will make every attempt to vote when given an opportunity to do so. However, there may be instances when the Firm is unable or unwilling to vote because of legal or operational difficulties or because it believes the administrative burden and/or associated cost exceeds the expected benefit to a client. BSP Ltd reviews the circumstances for each vote to determine which stance would best serve its clients and aims to act accordingly.

Arcmont – Direct Lending Fund III

Given that Arcmont is a private debt asset manager, there is limited scope to participate in voting activities. Due to this, Arcmont does not have a formal voting policy or track voting activities. Note that Arcmont may be able to vote in limited instances where:

- investments take on an equity element and they are assigned voting board seats; or
- in the rare circumstances that Arcmont becomes a majority shareholder of the business. However, at the levels of co-investment that Arcmont participates in, and in the current market conditions, Arcmont is typically only granted votes on economic protections and structural changes to the equity, e.g. if a new class of shares is to be issued and Arcmont is diluted.