

Implementation Statement

Macfarlanes Pension Scheme

Purpose of this statement

This implementation statement has been produced by the Trustees of the Macfarlanes Pension Scheme (“the Scheme”) to set out the following information over the year to 31 December 2025:

- How the Trustee’s policies on exercising rights (including voting rights) and engagement activities have been followed over the year.
- The voting activity undertaken by the Scheme’s investment managers on behalf of the Trustees over the year, including information regarding the most significant votes.

Stewardship policy

In April 2024, the Scheme entered into a buy-in policy with Aviva in respect of the full Scheme liabilities. As at 31 December 2025, the Scheme’s investment portfolio therefore consisted solely of a bulk annuity policy alongside a small cash holding in the Trustees’ bank account. The Trustees have decided that, going forward, ESG considerations cannot be meaningfully applied as day-to-day monitoring of voting and engagement falls to Aviva. With this in mind, they have not set stewardship priorities for the Scheme as there will be limited scope for influencing stewardship and engagement on the Scheme’s investments.

The Trustees’ Statement of Investment Principles (“SIP”) in force at 31 December 2025 describes the Trustees’ stewardship policy on the exercise of rights (including voting rights) and engagement activities. It was last reviewed in October 2024 and has been made available online here:

<https://www.macfarlanes.com/media/bcgdka54/macfarlanes-pension-scheme-statement-of-investment-principles.pdf>

How voting and engagement/stewardship policies have been followed

Up until the execution of the buy-in policy with Aviva, the Trustees were invested entirely in pooled funds, and therefore delegated responsibility for carrying out voting and engagement activities to the Scheme’s fund managers.

As outlined in the Trustee’s SIP in force at 31 December 2025, the Trustees believe that Environmental, Social and Governance (“ESG”) factors are financially material, but incorporating ESG factors is at Aviva’s discretion.

**Prepared by the Trustees of the Macfarlanes Pension Scheme
February 2026**