

Getronics UK Pension Plan - Responsible Investment Policy

The purpose of this policy is to set out the Trustee's Responsible Investment beliefs and principles, and to detail the approach they are taking to fulfil their commitments.

The effective date of this policy is March 2025.

Introduction

The Getronics UK Pension Plan (the "Plan") is a long-term investor, whilst taking into consideration the Plan's time horizon. The Trustee is responsible for making investment decisions regarding the Plan. The fiduciary duty of the Trustee is to act in the best financial interest of members of the Plan and seek the best investment return that is consistent with a prudent and appropriate level of risk.

The Trustee has appointed investment managers to manage the Plan's assets on a discretionary basis and to provide investment advisory services to the Trustee (the "Investment Advisers"):

- For the Defined Benefit Section, the Trustee's objectives include making sure that the benefits promised to members are provided. WTW is the Fiduciary Manager of this Section.
- For the Defined Contribution Section of the Plan, the Trustee's objectives include maximising the value of members' assets at retirement, whilst providing protection for accumulated assets in the years approaching retirement. Aon is the Fiduciary Manager of this Section. Where there is reference to Investment Advisers in this document, in relation to the DC Section it should be read as referring to Aon in its role as the Fiduciary Manager.

The Trustee seeks to fulfil its statutory duty which requires it to consider Responsible Investment in their investment strategy and governance decisions.

The Trustee defines Responsible Investment ('RI') as the integration and consideration of environmental, social and governance ('ESG') issues into both investment processes and ownership practices.

The Trustee seeks to fulfil its statutory duty of considering financially material risks, including ESG risks, through the integration of ESG issues throughout all aspects of their investment decision making process, including setting investment strategy and monitoring the Plan's underlying asset managers. The Trustee is supported in these aims through regular and ongoing input from and engagement with its Investment Advisers and the Plan's underlying investment managers.

The Trustee recognises that, as a long-term investor, it should incorporate ESG risks into its investment decision making process as the value of investments may be negatively impacted if these risks are not understood or evaluated properly.

This policy sets out the Trustee's beliefs in RI, and the consequent expectations, monitoring processes and asset allocation implications within areas such as broad ESG integration, Climate Change and Stewardship

Prepared for: The Trustee of the Getronics UK Pension Plan
Date: March 2025

The Trustee's Beliefs

The Trustee has discussed and agreed consensus beliefs relating to RI. These beliefs and principles form the basis of this policy and are set out below.

ESG Integration

- The Plan is a long-term investor (whilst taking into consideration the Plan's time horizon) and seeks to deliver long-term sustainable returns. The Trustee believes there is an opportunity to positively impact investment performance by taking decisions with a long-term outlook and recognising the significance of ESG risks and opportunities.
- The Trustee recognises that ESG considerations are relevant to the setting of investment objectives, ongoing monitoring, and assessment of future risks. The Trustee believes that the identification and management of ESG risks, that may be financially material, is part of their fiduciary duty to members.

Climate Change

- The Trustee believes that climate change is a material ESG factor that poses a financial risk over the Plan's investment time horizon.
- Furthermore, the Trustee recognises its influence as an institutional investor which includes an opportunity to help tackle climate change within the wider context of its fiduciary duty to members.

Stewardship

- The Trustee believes that companies that are poorly governed are more likely to underperform, and consequently the Trustee expects its underlying asset managers to engage with companies where necessary for the long-term enhancement of financial and social value.
- The Trustee believes that it has a responsibility to encourage its asset managers to exercise stewardship and active ownership responsibilities effectively (such as use of proxy voting rights and undertaking active engagement with investee companies).

Wider impacts

- Whilst the Trustee's focus is explicitly on financially material factors, the Trustee believes that it has a duty to be mindful of the wider environmental and social impacts of investments.
- The Trustee recognises that its members may have an interest in how RI is reflected through the Plan's investment strategy. The Trustee will make this policy available to the Plan's members and incorporate this RI approach into the way the Plan engages and communicate with members.

ESG Integration

Monitoring processes

The Trustee's processes to monitor and assess ESG-related risks and opportunities include the following:

- The Trustee includes ESG-related risks, including climate change, on the Plan's risk register as part of ongoing risk assessment and monitoring.
- The Trustee has discussed its RI beliefs and periodically review and compare these to the implementation processes of the appointed Investment Advisers to ensure ongoing alignment.
- The Trustee expects the Plan's Investment Advisers to understand its RI beliefs and requirements. The Trustee periodically provides its Policy to the Investment Advisers and asks them to raise any areas of incongruence for discussion.
- The Trustees review its Investment Advisers' approach to RI on a regular basis. The Trustees rely on its Investment Advisers' research process which considers ESG integration, team diversity, documented policies, voting policies, engagement, transparency and alignment of all investment managers that are researched.
- The Investment Advisers support the Trustee with training sessions on best practice and industry developments in RI as well as raising any significant concerns that may arise as a result of ad-hoc analysis.
- The Investment Advisers will assess the alignment of each underlying investment manager's approach to RI (including engagement) with its own before making an investment on the Plan's behalf. In addition, the Trustee expects the Investment Advisers to review the underlying investment managers' approach to RI (including engagement) on a periodic basis and engage with the investment managers to encourage further alignment as appropriate.
- The Plan's appointed investment managers have the delegated responsibility to take account of financially material ESG considerations (including climate change) in the selection, retention and realisation of investments.
- If any investment manager or service provider does not meet any of the expectations listed in this policy, the Investment Advisers, on behalf of the Trustee, will engage with the respective stakeholders to encourage improvements in processes, transparency or activity as required.

Asset Allocation

- The consideration of ESG issues is fully embedded in the portfolio management process, with oversight undertaken on a periodic basis. Where applicable, the Trustee monitors its Investment Advisers to ensure that they provide evidence of appropriate ESG integration in investment decisions.
- The Trustee requires the Plan's Investment Advisers to provide their RI policy, including details of their approach to stewardship, and how they integrate ESG into their investment decision making process, on a periodic basis.
- The Trustee recognises that the market is rapidly evolving. Where appropriate, the Trustee asks their Investment Advisers to highlight appropriate opportunities to invest in strategies that have explicit RI objectives, while delivering in line with the Plan's objectives, and will give due consideration to such proposals.

Climate Change

Monitoring Processes

The Trustee's processes to monitor and assess climate - related risks and opportunities include the following:

- The Plan's appointed Investment Advisers have set net zero carbon emissions targets by 2050.
- The Trustee welcomes this commitment and periodically engages with the Investment Advisers on the progress of stewardship and asset allocation decisions that support these goals.
- The Investment Advisers support the Trustee with training sessions to support the understanding of the systemic and Plan specific risks of climate change.

Asset Allocation

- The Trustee asks its Investment Advisers to highlight appropriate opportunities to invest in strategies that have explicit climate risk or stewardship objectives, while delivering in line with the Plan's objectives, and will give due consideration to any proposals.
- The Trustee could consider setting carbon reduction targets in the future, any such asset allocation decisions will also be consistent within the wider context of the Plan's fiduciary duty to deliver realistic returns over the long-term, and meet liabilities where applicable within appropriate risk level.

Wider Impacts

Monitoring Processes

The Trustee's processes to monitor wider portfolio impacts include the following:

- The Trustee may from time to time engage with the Investment Advisers to ascertain the investment rationale for investments in certain sectors and convey the expectation that there should not be material investment in certain harmful sectors.
- The Trustee expects investee companies to meet baseline practices in labour and human rights. The Trustee encourages engagement with relevant investee companies on the adoption of the United Nation Global Compact Principles (UNGC).

Stewardship – voting and engagement

Monitoring processes

The Trustee's processes to monitor and assess ESG-related risks and opportunities include the following:

- The Trustee expects the Plan's investment managers to use their influence as major institutional investors to carry out the Trustee's rights and duties as a shareholder including voting, along with – where relevant and appropriate – engaging with underlying investee companies.
- The Trustee expects investment managers to address broad ESG considerations, but has identified climate and human and labour rights as two of the biggest ESG risks facing the Plan, and consequently, these are key areas of focus for the Trustee.
- The Trustee requests and reviews details on an annual basis of how the Plan's investment managers are undertaking voting and engagement activity and includes details of this within the Plan's Implementation Statement.
- Voting information includes details of voting actions and rationale with relevance to the Plan, in particular where: votes were cast against management generally were significant and votes were abstained.
- Similarly, engagement activity disclosures should be of relevance to the Plan's investments and include information on the rationale and outcome of engagement activity.

- The Trustee is supportive of the use of third party stewardship providers to undertake public policy engagement and company-level engagement on its behalf, as well as assist with voting recommendations.
- In conjunction with the annual review of the ESG profile of the assets, the Trustee may engage with its appointed Investment Advisers for more information, for example, on the rationale on certain investments, carbon intensity and ESG integration developments.

Initiatives and industry collaboration

The Trustee recognises that collaboration and support of initiatives is a powerful tool to influence behaviour.

The Trustee is supportive of the principles of the UK Stewardship Code and to the Principles of Responsible Investment (PRI) and expect the Plan's Investment Advisers to be a signatory to both these initiatives.

The Trustee expects its Investment Advisers to keep them informed of relevant global and industry initiatives and will consider participating in opportunities where there is appropriate alignment with their RI beliefs.

The Trustees expects the Investment Advisers to encourage the Plan's investment managers to sign up to local or other applicable stewardship codes, in keeping with good practice, subject to the extent of materiality for certain asset classes.

The Trustee expects the Plan's asset managers to consider collaboration with others, as permitted by relevant legal and regulatory codes, where collaboration is likely to be the most effective mechanism for encouraging positive change at investee companies/issue.

Evolving our approach

The Trustee acknowledges that the Plan's approach to RI will need to continually evolve, due to both the changing landscape with respect to ESG issues and broader industry developments.

The Trustee is committed to making ongoing improvements to its approach and the processes that underpin the delivery of this policy. The Trustee is focused on making sure that it remains relevant and appropriate for the Plan's members.

Disclosure and reporting

The Trustee believes transparency is important. In support of this belief, the Trustee is making this policy available to members and welcomes any feedback. This policy supplements additional disclosures made within the Statement of Investment Principles (SIP) on the Plan's website, available at:

<https://www.mypensionline.com/getronics>

The Trustee will formally review its policy at least every three years as part of each formal triennial investment strategy review (carried out separately in respect of the DB and DC Sections of the Plan, respectively), or as required in response to changing regulations or broader governance issues.