Engagement Policy Implementation Statement ("EPIS")

Prowting Pension Scheme

Scheme Year End – 31 March 2026

The purpose of the EPIS is for the Trustees of the Prowting Pension Scheme (the "Scheme") to explain what they have done during the year ended 31 March 2026 to achieve certain policies and objectives set out in the Statement of Investment Principles ("SIP"). It includes:

1. How the Trustees' policies in the SIP about asset stewardship (including engagement activity) in relation to the Scheme's investments have been followed during the year; and

2. How the Trustees have engaged with investee companies/issuers or how such engagement has been exercised on their behalf.

Conclusion

Based on the activity the Trustees have undertaken during the year, they believe that the policies set out in the SIP have been implemented effectively.

The Scheme's assets are fully invested in government bonds, buy and maintain credit and cash managed by Legal & General Asset Management ("L&G"). As such assets do not carry voting rights, there is no voting activity to review or disclose this year, with the focus of this report being instead on L&G's engagement activity.

In the Trustees' view, L&G was able to disclose good evidence of engagement activity, and the activities completed by L&G align with the Trustees' stewardship expectations.

The Trustees will continue to meet periodically with L&G to get a better understanding of how the Trustees' engagement policies are being implemented.

How engagement policies have been followed

The Scheme is invested in pooled funds, and so the responsibility for engagement is delegated to the Scheme's investment manager, which is in line with the policies set out in the SIP. The Trustees accept responsibility for how the manager stewards assets on their behalf. The Trustees reviewed the stewardship activity of the investment manager carried out over the Scheme year and in their view, the investment manager was able to disclose good evidence of engagement activity. More information on the stewardship activity carried out by the Scheme's investment manager can be found in the following sections of this report.

Over the reporting year, the Trustees monitored the performance of the Scheme's investments on a quarterly basis and received updates on important issues from their investment adviser, Aon Investments Limited ("Aon"). In particular, they received quarterly ESG ratings from Aon for the funds the Scheme is invested in, where available.

During the year, the Trustees assessed the Scheme's responsible investment policy (updated in November 2024) and agreed that it remained appropriate. This can be found within the Scheme's Statement of Investment Principles (SIP).

Each year, the Trustees review the engagement policy of the Scheme's investment manager to ensure it aligns with the Trustees' policies for the Scheme and helps the Trustees to achieve them.

The Scheme's stewardship policy can be found in the SIP: https://www.persimmonhomes.com/corporate/sustainability/db-pensions-governance/

What is stewardship?

Stewardship is investors using their influence over current or potential investees/issuers, policy makers, service providers and other stakeholders to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society.

This includes prioritising which Environmental Social Governance ("ESG") issues to focus on, engaging with investees/issuers, and exercising voting rights.

Differing ownership structures means stewardship practices often differ between asset classes.

Source: UN PRI

Engagement Action Plan

Based on the work the Trustees have done for the EPIS, they have decided to take the following steps over the next 12 months:

1. The Trustees will continue to invite their investment manager to meetings periodically to get a better understanding of their engagement practices, and how these help the investment manager fulfil the Trustees' policies.

2. The Trustees will continue to review the engagement policy and activities of the Scheme's investment manager each year to ensure that they align with the Trustees' policies and are being implemented effectively.

Managers’ engagement activity

Engagement is when an investor communicates with current (or potential) investee companies (or issuers) to improve their ESG practices, sustainability outcomes or public disclosure. Good engagement identifies relevant ESG issues, sets objectives, tracks results, maps escalation strategies and incorporates findings into investment decision-making.

The table below shows, at Fund Level, the number of engagements on specific engagement themes carried out by the Scheme’s manager, L&G. The Firm Level engagements is the total number of engagement interactions L&G held with individual companies as opposed to the number of engagements on specific engagement themes. The manager has provided information for the most recent calendar year available.

Funds	**Number of engagements**		**Themes engaged on at a fund level**
	Fund level	**Firm level**	
L&G - Buy and Maintain	355	3,761	Environment - Climate Impact Pledge; Climate Change; Climate Mitigation Social - Gender Diversity; Income inequality; Lobbying and Political Donations Governance - Remuneration; Board Composition; Capital Management

Source: Manager.

Data limitations

This report does not include commentary on the Scheme’s investments in gilts and cash because of the limited materiality of stewardship to these asset classes. Further, this report does not include commentary on the stewardship by investment managers of Scheme members’ additional voluntary contributions (“AVCs”) due to the relatively small proportion of the Scheme’s assets that are held as AVCs.