

IMPLEMENTATION STATEMENT – DB Section

The Trustees of the Ideal Stelrad Group Pension Plan have prepared this implementation statement in compliance with the governance standards introduced under the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 (as amended). Its purpose is to demonstrate how, and the extent to which, the Plan's Statement of Investment Principles (SIP) has been followed, if there has been any review of the SIP and how the policies on voting, stewardship and engagement have been followed. This statement covers the period 1 April 2023 to 31 March 2024.

A. Review of the Statement of Investment Principles

During the Statement Period, the Trustees reviewed and updated the Statement of Investment Principles (SIP). Following an investment strategy review in 2023 the Trustees decided to de-risk the Plan and move to a portfolio which hedges 100% of the inflation and nominal interest rate risk in the gilts flat liabilities.

B. Plan Governance

During the Statement Period the Trustees continued to have responsibility for the governance and investment of the Plan's assets whilst delegating the day-day aspects of investment management to their Fiduciary Manager, SEI. SEI is required to manage the Plan in line with the principles and policies set out in the SIP.

C. Implementation of the Statement of Investment Principles

The SIP sets out the policies in the following matters:

i. Investment Objectives

The Fiduciary Manager, SEI has managed the Plan's assets in accordance with the Trustees' primary objective to make sure that together with contributions from the employer the assets meet the obligations to the beneficiaries of the Plan. This is by implementing a long-term strategy with a rate of investment return higher than the growth of the Plan's liabilities to ensure full funding on an appropriate basis.

ii. Choosing Investments

The Trustees have delegated management of the investment portfolio to the Fiduciary Manager, SEI. SEI has chosen investments in accordance with the criteria set out in the Investment Regulations, the Occupational Pension Scheme (Charges and Governance) Regulations 2015. For the current strategy, SEI has chosen assets across a diverse portfolio of investments to reduce investment risk.

iii. Risks

The management of investment risk is a function of the asset allocation and diversification strategies. SEI have managed the investment risk by monitoring the risks and updating the Trustees over the year.

iv. Expected return on investments

The Trustees receive and reviewed quarterly reports over the year and were satisfied with the content of the report and that SEI's performance was in line with the SIP policies and the Trustees' long-term expectations.

v. Financial and non-financial material considerations

The Fiduciary Manager, SEI acknowledges that environmental, social, and governance (ESG) factors may have material impacts on the financial performance of an investment. SEI seeks to consider ESG and sustainability factors in the management of the funds by (i) performing an ESG assessment as part of manager research to develop a deeper understanding of Portfolio Managers' capabilities, (ii) by requiring all Portfolio Managers to consider material financial and non-financial risks as part of their investment process; (iii) by conducting effective and independent risk oversight and (iv) by striving to act as good stewards of assets through shareholder engagement and proxy voting.

vi. Voting and Engagement

Please refer to section D for further details regarding the implementation of the Voting and Engagement policy.

vii. Asset Manager arrangements

The Trustees have conducted the annual review of the investment objectives and continues to monitor performance on a quarterly basis against these objectives.

The Trustees are satisfied that the policies as described in the SIP have been implemented during the year.

The Trustees have not identified any areas where the Plan's investments have diverged from the policies set out within the SIP.

D. Voting and Engagement Policy

The policy as set out in the SIP in respect of voting, stewardship and engagement is in summary as follows:

- i. The Plan only invests via pooled investment funds, meaning that the Plan's investments are pooled with those of other investors. It can be harder for those invested in pooled funds to exert their influence, given the other investors with a stake, but the Trustees still monitor and engage as much as possible.
- ii. Voting decisions on stocks are delegated to the investment manager of the pooled funds held by the Plan.
- iii. SEI, the Plan's Fiduciary Manager, or the investment manager of a third party pooled fund, has full discretion for undertaking engagement activities in respect of the investments.

- iv. Where the investment manager is SEI, they have pooled their holdings in their funds with other investors and employed a specialist proxy voting service provider for voting and engagement services.
- v. SEI will report on voting and engagement activity to the Trustees on a periodic basis together with its adherence to the UK Stewardship Code. The Trustees will consider whether the approach taken was appropriate or whether an alternative approach is necessary. The Fiduciary Manager is a signatory to the UK Stewardship Code 2020.
- vi. The Trustees will assess the Fiduciary Manager's performance against objectives annually including how well the Fiduciary Manager is aligned with the SIP in terms of ESG factors.

The Trustees are of the opinion that this policy has been followed during the year. In particular:

- The Trustees have received and reviewed quarterly reports from SEI that set out
 - How SEI has voted on all the shares where SEI has voting rights including number of votes for, against and abstentions. For votes against, details of the issue to which the vote relate is provided.
 - The number of companies engaged and the number of milestones achieved by engagement issue.
- The Trustees reviewed the above quarterly reports throughout the Plan year and monitored performance. The Trustees were satisfied with the content of the report and that SEI's performance was in line with the SIP and the Trustees' expectations.
- The Trustees have considered SEI's voting practices and stewardship policies noting that they are a signatory to the UN Principles for Responsible Investment.
- The Trustees have a process in place to review SEI's performance against objectives, including ESG factors.

SEI's engagement priorities which for 2023 included priorities in each of the following categories:

- Climate change
- Sustainable Agriculture
- Modern Slavery
- Future of Work
- Board Governance

SEI's engagement efforts are primarily focused on public equities; however, many companies represented in our engagement efforts are also held in fixed income strategies. SEI believes that these fixed income funds also benefit from the positive progress that results from productive shareholder engagement. The engagement on climate change through SEI's collaboration with their engagement partner spans both equity and fixed income.

In light of the above and otherwise, the Trustees have considered their policy in regard to voting and stewardship and concluded that

- SEI's voting and stewardship policies and implementation on behalf of the Trustees remain aligned with the Trustees' views on these matters.

- The current policy is appropriate and no further action is required at this stage, albeit the Trustees will continue to monitor the performance of this policy and SEI's performance in the future.

E. Voting Record

All underlying securities in pooled funds that have voting rights are managed by SEI with SEI having the legal right to the underlying votes. SEI in turn use Glass Lewis as a proxy voting service provider for all voting. SEI provide Glass Lewis with the holdings across all SEI's pooled funds and the proxy votes are cast according to a policy set out by SEI. During the period from 1 April 2023 to 31 March 2024, across the Plan's holdings¹ SEI voted² as follows, including the percentage of overall votable items voted on:

Fund Name	Global Managed Volatility	Global Select Equity	Dynamic Asset Allocation
ISIN	IE00B19H3542	IE00B295X008	IE00B5NNKL10
Number of Votable Meetings	532	310	690
Number of Votable Items	8184	5907	14698
% of Items Voted	91%	96%	91%
For	87%	87%	91%
Against	10%	9%	8%
Abstain/ Withheld/ Other	3%	4%	1%
% of votes with management	90%	91%	92%
% of votes against management	10%	9%	8%
% of votes other	0%	0%	1%
Voting Against/Abstain by Category			
Capital Related	8%	5%	7%
Board/Directors/Governance	47%	34%	51%
Remuneration Related	15%	23%	24%
Shareholder Proposals	27%	37%	16%
Other	3%	2%	1%

¹ SEI has shown voting data for the relevant quarters the fund was invested in.

² Source: SEI and Glass Lewis

Fund Name	Factor Allocation Global Equity	UK Fundamental Equity	UK Quantitative Equity
ISIN	IE00BDD7WJ18	IE00B3KF4Q98	IE00B3KF5336
Number of Votable Meetings	398	34	114
Number of Votable Items	3826	692	2328
% of Items Voted	96%	100%	99%
For	88%	97%	98%
Against	10%	3%	2%
Abstain/ Withheld/ Other	2%	0%	0%
% of votes with management	89%	98%	98%
% of votes against management	10%	2%	2%
% of votes other	2%	0%	0%
Voting Against/Abstain by Category			
Capital Related	3%	0%	0%
Board/Directors/Governance	43%	30%	31%
Remuneration Related	18%	25%	53%
Shareholder Proposals	11%	20%	11%
Other	24%	25%	4%

F. Significant Votes

A highlight of some of the significant votes² during the period are shown in the table below. These votes are considered to be significant as they have a material impact on the company or the wider community. SEI selects votes based on one or more of the following criteria:

- Votes SEI consider to be high profile which have such a degree of controversy that there is high client and/ or public scrutiny.
- Votes relating to companies with a high or severe ESG risk rating.
- Votes relating to our 2023 thematic priorities as described in section D.

To date the Trustees have accepted SEI's position on what constitutes a significant vote but this will be kept under consideration.

Company Name	Held in Fund(s) (% size of holding) ³	Theme	Date of Vote and Outcome	Vote Decision and Significance of vote
Amazon	Dynamic Asset Allocation (<0.5%) Global Select Equity (<0.5%)	Corporate Governance	Date: 24/05/2023 Outcome: For	Voted For the 'Shareholder Proposal Regarding Report on Working Conditions'. Amazon has faced scrutiny and exposure to a variety of risks on account of its worker health and safety. An analysis of work-related injury data from the Occupational Safety and Health Administration ("OSHA") showed that the Company's warehouse jobs can be more dangerous than comparable warehouses, as the Company has reported a higher rate of serious injury incidents that caused employees to miss or shift work duties more than other retail warehouses since 2017. Amazon has been fined in recent years for violating workplace safety laws by requiring warehouse employees to perform repetitive motions at a fast pace, increasing their risk of injury. This vote is considered significant because Amazon is a high profile company and if the company does not provide appropriate working conditions it can face regulatory action, legal fines and reputational harm which are often reported in the media. Additionally, high turnover and problems attracting workers can lead to the erosion of shareholder value. The additional disclosure and independent audit report would likely allow employees to provide an honest assessment of their experiences and would provide some assurance to shareholders that the working conditions are being evaluated. Amazon has a high ESG risk rating.
ArcelorMittal SA	Dynamic Asset Allocation (<0.5%) Global Select Equity (<0.5%)	Corporate Governance	Date: 02/05/2023 Outcome: Against	Voted Against the 'Ratification of Board Acts'. ArcelorMittal SA has had ongoing health and safety related incidents in recent years with a number of fatal accidents, resulting in fines and industrial action as well as negative media coverage. In 2022, ArcelorMittal reported 22 work-related deaths, five of which were caused by a methane explosion in ArcelorMittal's Karaganda coal mine in November 2022. This vote is deemed significant because there are substantial concerns regarding the oversight of health and safety matters at ArcelorMittal SA which the board is responsible. The continued occurrence of work site fatalities and other safety-related

³ % holding as at last day of the quarter in which vote occurred.

				issues, indicates the Company may have failed to meaningfully address these issues in a way that satisfies shareholders' interests. The Company continues to be exposed to significant legal and reputational risk as a result of legal and regulatory proceedings and controversies it is involved in. It is therefore not in the shareholders' best interests to ratify the actions of the Company's directors under these circumstances. ArcelorMittal SA has a high ESG risk rating.
Axon Enterprise Inc	Dynamic Asset Allocation (<0.5%) Global Select Equity (<0.5%)	Social Governance	Date: 31/05/2023 Outcome: Against	Voted For the 'Shareholder Proposal Regarding Discontinuation of Plans for a Remotely-Operated, Non-Lethal Taser Drone System'. After a number of mass shootings in the United States, Axon Enterprise Inc announced that it had begun the development of a non-lethal, remotely-operated TASER drone system as part of a long-term plan to stop mass shootings, particularly in schools. The lack of disclosure on ethical considerations and safety precautions pertaining to the launch of the TASER drone system is a concern. This vote is considered significant because the taser drone has had substantial media coverage on how effective it would be and failing to gain the support of stakeholders and local communities prior to launching this product could present significant challenges for the Company. Axon Enterprise Inc has a severe ESG risk rating.
Exxon Mobil Corp.	Dynamic Asset Allocation (<0.5%) Global Managed Volatility (<0.5%) Global Select Equity (<0.5%)	Environmental Incident	Date: 31/05/2023 Outcome: Against	Voted For the 'Shareholder Proposal Regarding Report of Guyanese Operations'. Exxon Mobil Corp. operates one of the largest oil fields discovered in the past decade, offshore of the South American country Guyana. Concerns were raised that the Company had disregarded safety-related issues and failed to adequately prepare for possible disasters in the region. This vote is considered significant because Exxon Mobil Corp's responsibility and potential liability with respect to its response to an oil spill are of concern to shareholders and an oil spill would have wider environmental and public impact. The production of a report evaluating the economic, human, and environmental impacts of a worst-case oil spill from its operations offshore of Guyana would help provide shareholders with reassurance that these matters were being handled in a way that served their best interests and would provide more insight into how it intends to

				mitigate safety-related risks. Exxon Mobil Corp. has a severe ESG risk rating.
Meta Platforms Inc	<p>Dynamic Asset Allocation (<0.5%)</p> <p>Global Select Equity (<0.5%)</p>	Social Governance	<p>Date: 31/05/2023</p> <p>Outcome: For</p>	Voted For the 'Shareholder Proposal Regarding Targets and Report on Child Safety Impacts'. Meta Platforms Inc is the world's largest social media company with billions of children and teen users, and the Company's platforms, including Facebook, Instagram, Messenger, and WhatsApp, have been linked to numerous child safety impacts and social policy challenges. In 2021, nearly 29 million cases of online child sexual abuse material were reported, and nearly 27 million of those (92%) stemmed from the Company's platforms. This vote is deemed significant as Meta Platforms Inc is a high profile company and it has no publicly available, Company-wide child safety or harm reduction performance targets for shareholders and stakeholders to judge the effectiveness of the Company's policies and actions. Therefore, the adoption of metrics could help the shareholders evaluate the Company's current actions and further mitigation of child safety cases on their platforms. Meta Platforms Inc has a high ESG risk rating.
Chevron Corp.	<p>Dynamic Asset Allocation (<0.5%)</p> <p>Global Managed Volatility (<0.5%)</p> <p>Global Select Equity (<0.5%)</p>	Environmental Governance	<p>Date: 31/05/2023</p> <p>Outcome: For</p>	Voted For the 'Shareholder Proposal Regarding Recalculated Emissions Baseline'. Since 2016, Chevron Corp. reports a 4.7% reduction in its portfolio carbon intensity, but between 2017 and 2021, it sold more assets than any other American oil and gas company, and it is unclear how the Company accounts for these divestitures in its emissions reporting. Shareholders cannot determine whether the Company's reported GHG reductions are the result of operational improvements or of transferring emissions off its books. This vote is deemed significant as disclosure of a recalculated baseline emissions figure could provide useful context to shareholders concerning the Company's progress on its goals and climate targets and would ensure accuracy and comparability of emissions reporting. Chevron Corp. has a high ESG risk rating.
Tyson Foods, Inc.	Dynamic Asset Allocation (<0.5%)	Modern Slavery	<p>Date: 08/02/2024</p> <p>Outcome: For</p>	Voted For the proposal to request 'that Tyson Foods, Inc. commission an independent third-party audit assessing the effectiveness of its policies and practices to prevent illegal child labour. In March 2023, a Department of Labour ("DOL") investigation found the use of illegal child labour in the Company's Arkansas and Tennessee facilities, where these children,

				<p>employed by the Company's contractor Packers Sanitation Services Inc., worked during the night shifts and were exposed to dangerous chemicals and meat processing equipment like back saws and head splitters. This vote is deemed significant as shareholders remain concerned the illegal use of child labour poses significant financial, reputational, legal, and human rights risks throughout the Company's value chain. An independent audit of child labour policies could help to protect shareholder interests, additionally regular reporting with progress and meaningful consultation with workers, suppliers, and other relevant stakeholders would enable the company to inform appropriate solutions and ensure compliance with federal child labour requirements.</p>
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G. Engagement Activity

A highlight of some of the engagements during the period are shown in the table below. SEI conducts shareholder engagement collaboratively through third party specialists Sustainalytics and Columbia Threadneedle Investment reo. Each case study⁴ describes a milestone achieved relating to our engagement priorities as described in section D.

Company Name	Held in Fund(s)	Theme	Objective	Description
Southwest Airlines	Dynamic Asset Allocation	Climate Change	Set emissions reduction targets, publish a sustainable aviation fuel procurement policy, and address contrail emissions.	<p>Columbia Threadneedle Investments reo® has been engaging with Southwest Airlines since the beginning of 2022, and the company has been receptive and open to dialogue on a number of climate-related issues.</p> <p>While Southwest Airlines had already set a target to reduce its emissions intensity by 20% by 2030, the company lags many industry peers that have set targets aligned with a below-2°C scenario. Much of the company's efforts will rely on incorporating sustainable aviation fuel (SAF) into its fuel mix, but it had not provided clarity on how ESG risks related to SAF use would be managed through procurement. Additionally, the company had not been actively engaged in efforts to manage contrail emissions.</p> <p>In Columbia Threadneedle's meeting with Southwest in the first quarter of 2023, the company shared that it anticipated</p>

⁴ Source: SEI and Sustainalytics

				publishing enhanced climate targets in the near future, and updated investors that it had published the five criteria of its SAF policy that lays out which types of SAF the company will use. Additionally, Southwest has become a founding member of the Contrail Impact Task Force that is working to address contrail emissions in the industry. Columbia Threadneedle will continue to engage the company on these issues going forward.
Archer-Daniels-Midland	Global Managed Volatility Dynamic Asset Allocation	Thematic engagement – Sustainable agriculture	Setting goals to eliminate deforestation	<p>Archer-Daniels-Midland (ADM) is an American multinational food processing and commodities corporation that Sustainalytics has been engaging since 2021, focusing on biodiversity, deforestation, and pesticides & fertilizers. As one of the world's largest agricultural processors and food ingredient providers, ADM has an important role to play in setting sustainable industry standards.</p> <p>In May 2023, Sustainalytics held a call with the Chief Sustainability Officer of ADM, discussing their sustainability governance and progress in eliminating deforestation. ADM published its latest sustainability report the same month, outlining progress on the company's goal to eliminate deforestation from all of its supply chains by 2025. 86% of the soy supply chain and 62% of the palm supply chain are now third-party verified deforestation-free. ADM advised that they have conducted a risk assessment for other commodities, but have chosen to focus on soy and palm due to the associated deforestation and human rights risks. In the final year of the engagement, Sustainalytics will focus on management of land use impacts, biodiversity, and soil health in the company's agricultural supply chain.</p>
Roche Holding AG	Global Managed Volatility Dynamic Asset Allocation	Thematic engagement – Climate change	Set targets in alignment with the Science Based Targets initiative (SBTi) and increase disclosure	<p>Roche is a Swiss multinational company and one of the world's largest pharmaceutical companies. Columbia Threadneedle Investments reo has been engaging with Roche for many years on a number of environmental, social, and governance topics, with a strong focus on climate change.</p> <p>In a meeting in the second quarter, Roche shared their 2023 aspirations, including the prioritization of resource allocation towards long-term sustainability goals and the appointment of a Chief Sustainability Officer. Disclosure has been a significant focus of engagement efforts with the</p>

				<p>company, which recently announced plans to refine and further develop its reporting strategy. They plan to submit emission reduction targets to the Science Based Targets initiative before the end of 2023. However, at this time Roche is still not considering a particular demand to participate in the CDP survey. Columbia Threadneedle will continue to engage Roche on improving transparency and additional climate issues going forward.</p>
RWE AG	<p>Dynamic Asset Allocation</p>	Thematic - Climate change	Engaging on the company's decarbonisation strategy	<p>RWE is a German utility company engaged in the generation, transmission, and distribution of electricity and gas, and is one of the last European utility players with coal mine and power assets. RWE has emissions targets in place covering Scope 1, 2, and 3 emissions which have been validated as well-below 2°C-aligned and carbon neutral for 2040. They await verification for a new set of 1.5°C-aligned targets, recently submitted to the Science Based Targets initiative. As a result, the focus of engagement has been on their decarbonisation strategy.</p> <p>Recent discussions with the company have focused on RWE's coal phase-out timelines and end-of-life strategy for these assets, as well as their approach to hydrogen and carbon capture, usage, and storage. The climate component of their executive remuneration and progress on renewable targets have also been topics of discussion. RWE confirmed that they have agreed with the German government to a 2030 coal phase-out, an improvement from their original goal of 2038. The company is in the process of developing "green conversion" roadmaps for these assets. Engagement efforts have encouraged further disclosure on the end-of-life plans for the referenced assets. A meeting will take place in early 2024 to discuss progress on these disclosures.</p>
Johnson & Johnson (J&J)	<p>Dynamic Asset Allocation</p> <p>Factor Allocation</p> <p>Global Managed Volatility</p>	Global standards – Product quality and safety	Remedy deficiencies in the company's quality management system	<p>Johnson & Johnson is an American multinational pharmaceutical company that has been implicated repeated in quality and safety issues related to several of its offerings, including talc-based products. Sustainalytics has engaged with the company over the last five years to ensure that the lessons learned from the numerous product quality issues have been incorporated into company protocols and procedures to minimize the risk of future litigation.</p>

				<p>Over the years the company has improved its ESG disclosures on clinical trial data, quality management, and product stewardship. Reductions in both FDA activity against the company and subsequent product recalls suggest improved quality control. It is reported that J&J still faces a high number of lawsuits, so the potential for future litigation cannot be discounted. However, in August 2022 the company announced that it was discontinuing worldwide sales of talc-based products by the end of 2023. Considering improvements in product quality and safety management, and a lack of any new severe product quality and safety issues, Sustainalytics decided to resolve the case.</p>
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The information relating to the significant votes is derived from public third party source(s). While the information is believed to be reliable, SEI has not sought to verify it independently. This material is intended to be for information purposes only and has been provided to SEI's client at their request. This data is not intended as promotional material in any respect.