

Implementation Statement (“IS”)

C-MAC Pension Plan (the “Plan”)

Plan Year End – 5 April 2026

The purpose of the Implementation Statement is for us, the Trustee of the C-MAC Pension Plan, to explain what we have done during the year ending 5 April 2026 to achieve our objectives and implement our policies as set out in the Statement of Investment Principles (“SIP”). The Plan holds both Defined Benefits (“DB”), in the form of a GMP underpin, and Defined Contribution (“DC”) funds. All funds are invested in the same way, irrespective of the benefit provided and this statement therefore covers both DB and DC. It includes:

1. A summary of any review and changes made to the SIP over the year;
2. How our policies in the SIP have been followed during the year; and
3. How we have exercised our voting rights or how these rights have been exercised on our behalf, including the use of any proxy voting advisory services.

Our conclusion

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

In our view, most of the Plan’s material investment managers were able to disclose good evidence of voting and engagement activity, and the activities completed by our managers align with our stewardship expectations.

Changes to the SIP during the year

The SIP was not formally reviewed during the year to 5 April 2026.

The SIP was last formally reviewed during the year to 5 April 2024 and was updated on 25 October 2023. The SIP was revised to satisfy the following new requirement which is effective for SIPs updated from 1 October 2023:

- Addition of the Trustee's policies on illiquid investments.

The revised SIP also includes updates to the Trustee's stewardship policy and Trustee's policy regarding the expected return on investments.

The Plan's latest SIP can be found here:

<https://www.apexgroup.com/statement-of-investment-principles/c-mac-pension-plan/>

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.

How the policies in the SIP have been followed

In the table below we set out what we have done during the year to meet the policies in the SIP.

- a. *To ensure members have an appropriate choice of assets for investment*

For members who do not wish to make an active investment decision, a default lifestyle strategy which targets a retirement benefit of 75% annuity and 25% cash is in place. This strategy gradually moves members from higher risk growth-seeking assets to assets that reflect how members are expected to take benefits as they approach retirement. In addition, there are 2 alternative lifestyle strategies and 9 self-select funds available, which members can choose from depending on their risk appetite and if they are comfortable making their own investment decisions.

The Trustee, with assistance from its investment advisers, undertakes triennial reviews of the Plan's investments, including formally reviewing the default arrangement. The last review concluded on 7 December 2023. This review considered the suitability of the default arrangement and other investment funds with reference to the membership demographics and how members access their benefits, as well as industry data and wider market trends. The Trustee took advice from its investment advisers ("Aon") and decided that retaining the existing default arrangement would best meet the needs of the membership. No changes were made to the two alternative lifestyle strategies (one of which targets cash at retirement and the other targets income drawdown). The next investment strategy review is planned to take place in Q4 2026.

The Trustee receives and reviews annual monitoring reports from Aon which provide information regarding the short and long-term performance of all the funds offered to members, including the default lifestyle strategy. Over this reporting period, this review did not raise concern over the suitability of the investment strategy to meet the Trustee's objectives stated above.

Since there are a range of options available to members covering the main asset classes and different levels of risk, the Trustee is comfortable that it has met its objective of providing a range of investments likely to be able to meet members' needs.

b. To enable members to benefit from investment in assets which are expected to produce a return in excess of inflation until they reach retirement.

The Trustee works with Aon to consider the long term expected returns from the funds that are available to members. Aon's long term (10 year) asset class expectations continue to support the Trustee's view that the investment options available to members, and in particular the default strategy, are consistent with the objective of achieving asset returns that are in excess of inflation over the long term.

The Trustee also receives annual monitoring reports from Aon which provide information regarding the short and long-term performance of the funds offered to members.

During the course of the year, all of the lifestyle funds produced returns above inflation, with the exception of the Prudential Long-Term Gilt Passive Fund. In terms of the freestyle funds, member assets were only invested in the Prudential BlackRock Aquila World ex-UK Index which performed ahead of inflation over the course of the year. Considering longer term performance, the table below shows 5-year annualised performance relative to annualised CPI for the period to the end of March 2026. The Prudential Long-Term Gilt Passive Fund, Prudential Dynamic Growth II and the Prudential Cash Fund have delivered long term returns that are below the rate of inflation over this 5-year period. These returns are from a period with considerable volatility in the UK gilt market and inflation at levels in excess of long term expectations.

The majority of the funds included in the default lifestyle (with the exception of the Prudential Discretionary Fund) continue to broadly meet their individual benchmarks over the longer term and the Trustee does not have any immediate concerns over performance. The Trustee will continue to assess performance using the monitoring reports and remains satisfied that this objective will be met over the long term once inflation returns to more normal levels. However, if its investment advisers propose actions to be taken, then the Trustee will act accordingly.

Fund	5-year performance (% p.a.)	5-year Inflation (% p.a.) based on CPI*	Relative
Prudential Long-Term Gilt Passive Fund	-10.5	5.2	-15.7
Prudential BlackRock Aquila Consensus Index Fund	7.6	5.2	2.4
Prudential Discretionary Fund	6.1	5.2	0.9
Prudential Cash Fund	3.3	5.2	-1.9
Prudential Dynamic Growth IV	5.8	5.2	0.6
Prudential Dynamic Growth II	3.6	5.2	-1.6
Prudential BlackRock Aquila World ex-UK Index	11.4	5.2	6.2

Source: Prudential

Performance is shown gross of fees and annualised.

*Consumer Price Index year to 31 March 2026

c. <i>To provide members with an investment choice that seeks to reduce the volatility in investment returns</i>	The Trustee has made a range of fund options available to members covering the main assets classes and different levels of risk. The default strategy is designed to reduce the volatility of annuity purchasing power for a member who intends to use 75% of their retirement benefits to purchase an annuity and take the remainder as cash. Alternative lifestyle strategies are available for members who wish to target either drawdown or cash at retirement. Members are also able to choose from the range of funds on a self-select basis, targeting a variety of asset classes. An investment strategy review was completed on 7 December 2023 and the Trustee concluded the investment options remain suitable for members. The Trustee is comfortable that it has met its objective of providing members with an investment choice that seeks to reduce risk and volatility in the returns achieved.
d. <i>Funding Objective – "Where required.... to ensure the Plan has sufficient assets available to pay the Guaranteed Minimum Pension ("GMP") as and when they arise."</i>	The actuarial valuation at 6 April 2023 was completed on 1 May 2024 and showed a deficit of £715K on the technical provisions basis, with an approximate allowance made for GMP equalisation. The Trustee and Plan Actuary discussed how the funding objective could be met and a Recovery Plan, dated 1 May 2024, was agreed between the Trustee and the Company to remove the deficit, with quarterly contributions of £100,000 being paid between 31 July 2021 and 30 April 2025 inclusive. The Plan has had sufficient assets to meet the GMP payments over the year as and when they have arisen. This objective has therefore been met over this reporting period.
e. <i>Security Objective – To ensure that the Solvency position of the Plan is expected to improve</i>	The actuarial valuation at 6 April 2023 showed a solvency deficit of £715K, with an approximate allowance made for GMP equalisation. The estimated solvency position improved over the year to 5 April 2024 and improved further over the year to 5 April 2025, due partly to the deficit contributions agreed under the Recovery Plan dated 1 May 2024. This objective is therefore met.
f. <i>"Stability Objective" – To have due regard to the Company's ability in meeting its contribution payments given their size and incidence</i>	Under the Recovery Plan agreed between the Trustee and the Company on 1 May 2024, deficit contributions were paid at £100,000 per quarter. These contributions have all been paid and therefore the Trustee has no concerns about the Company's ability to make the agreed payments. This objective is therefore met.
In addition to the above investment objectives, the Trustee has several policies set out in the SIP. Below, the Trustee has explained how these have been met.	
g. <i>Choosing Investments – The SIP states that 'the Trustee's policy is to obtain advice concerning the continued appropriateness of the investment strategy, investment manager and the range of funds available every three years, or sooner in the event of any significant changes to their investment objectives.'</i>	The Trustee continues to take advice from Aon regarding the appropriateness of the investments for members.
h. <i>Social, Environmental or Ethical Considerations – The SIP states that 'the Trustee expects the Plan's investment managers to, where appropriate, engage with investee</i>	The Trustee receives voting and engagement data from the Plan's platform provider, Prudential, to evidence that the investment managers are actively voting and engaging with investee companies on behalf of the Trustee. Further detail of this is provided in the Voting and Engagement section.

companies with the aim to protect and enhance the value of the assets and exercise the Trustee's voting rights in relation to the Plan's assets.'

- i. *Effective Decision Making – The SIP states that 'The Trustee recognises that decisions should be taken only by persons or organisations with the skills, information and resources necessary to take them effectively. It also recognises that where it takes investment decisions, it must have sufficient expertise and appropriate training to be able to evaluate critically any advice received.'*

The Trustee continues to take advice from Aon regarding the appropriateness of the investments for members. The last formal investment strategy review considered the suitability of the default arrangement and other fund options with reference to the membership demographics and how members access their benefits, as well as industry data and wider market trends. The Trustee took advice from Aon, and decided that retaining the existing default arrangement would best meet the needs of the membership. The next investment strategy review is planned to take place in Q4 2026.

Investment monitoring takes place on an annual basis with a monitoring report being provided to the Trustee by Aon. The reports monitor performance of the Plan against benchmark and target and highlight any areas for action or concern. Fund performance is evaluated based on Aon's PlanWatch methodology. This assigns red, amber or green ratings to fund performance over the short and long term. Any funds that are assigned a 'Red' rating are monitored closely by Aon and discussed with the Trustee. Over the period, funds received mixed ratings; however, most of the funds met or marginally outperformed their benchmarks over the longer term before fees. There were no immediate concerns with performance and no actions were recommended.

The Trustee is an independent professional organisation, which acts as a trustee across a number of different pension schemes. Internal processes exist within the organisation to ensure employees are appropriately trained and conversant with Plan documentation and undertake continuous professional development throughout the year in line with the requirements of their professional organisation.

The Trustee has engaged with their professional advisers regularly throughout the period to ensure that it exercises its functions properly and takes professional advice where needed. In exercising its functions, this has required knowledge of key Plan documents such as the Trust Deed & Rules, Trustee Report & Accounts and SIP.

Given this and the advice provided by its advisers, the Trustee considers that it is well placed to effectively make appropriate decisions regarding the investments of the Plan.

Our managers' voting activity

Good asset stewardship means being aware and active on voting issues, corporate actions and other responsibilities tied to owning a company's stock. We believe that good stewardship is in the members' best interests to promote best practice and encourage investee companies to access opportunities, manage risk appropriately, and protect shareholders' interests. Understanding and monitoring the stewardship that investment managers practice in relation to the Plan's investments is an important factor in deciding whether a manager remains the right choice for the Plan.

Voting rights are attached to listed equity shares, including equities held in multi-asset funds. We expect the Plan's equity-owning investment managers to responsibly exercise their voting rights.

Voting statistics

The table below shows the voting statistics for the Plan's material funds with voting rights that had assets invested in as at 5 April 2026.

Note that voting information is only produced by the Plan's investment managers on a calendar quarter basis so information for the year to 5 April 2026 was not available. We are comfortable that the information provided (which reflects the 12 months to 31 March 2026) is reflective of the voting carried out on their behalf over the Plan year to 5 April 2026.

Funds	Number of resolutions eligible to vote on	% of resolutions voted	% of votes against management	% of votes abstained from
BlackRock Aquila World ex-UK Index S3 Fund	25,270	94.0%	4.3%	0.4%
BlackRock Aquila Consensus S3 Fund	58,451	97.1%	6.3%	1.8%
M&G PP Discretionary Fund S3	50,051	97.6%	7.2%	0.7%

Source: Investment managers. Please note that the 'abstain' votes noted above are a specific category of vote that has been cast, and are distinct from a non-vote.

Use of proxy voting advisers

Many investment managers use proxy voting advisers to help them fulfil their stewardship duties. Proxy voting advisers provide recommendations to institutional investors on how to vote at shareholder meetings on issues such as climate change, executive pay and board composition. They can also provide voting execution, research, record keeping and other services.

Responsible investors will dedicate time and resources towards making their own informed decisions, rather than solely relying on their adviser's recommendations.

The table below describes how the Plan's managers use proxy voting advisers.

Why is voting important?

Voting is an essential tool for listed equity investors to communicate their views to a company and input into key business decisions. Resolutions proposed by shareholders increasingly relate to social and environmental issues.

Source: UN PRI

Why use a proxy voting adviser?

Outsourcing voting activities to proxy advisers enables managers that invest in thousands of companies to participate in many more votes than they would without their support.

Managers	Description of use of proxy voting advisers (in the managers' own words)
M&G Investments ("M&G")	M&G use the ISS STOXX voting platform to vote and implement their voting policy through a custom voting service. As shareholder meetings arise, the custom voting service refers resolutions that contravene the voting policy. M&G also use research from ISS and the Investment Association's Institutional Voting Information Service (for UK companies) to help make voting decisions.
BlackRock	BlackRock Investment Stewardship leverages ISS as an external proxy services vendor. ISS' electronic voting platform allows BlackRock Investment Stewardship to monitor voting activity, execute proxy vote instructions, record keep, and generate client and regulatory voting reports. BlackRock Investment Stewardship also uses Glass Lewis' services to support research and analysis. In addition to the global research provided by ISS and Glass Lewis, BlackRock Investment Stewardship subscribes to market-specific research providers including Institutional Voting Information Service in the UK, Ownership Matters in Australia, Stakeholder Empowerment Services in India, and ZD Proxy in China. Although proxy research firms provide important data and analysis, BlackRock Investment Stewardship does not follow any proxy research firm's voting recommendations. BlackRock Investment Stewardship has operational specialists on the team who are fully focused on ensuring votes cast on behalf of clients are successfully instructed, using its vendor's electronic voting platform. The controls BlackRock Investment Stewardship has in place ensure that the team identifies upcoming meetings, cast votes ahead of the voting deadline for each meeting, reconcile holdings with ballots received, and identify any uninstructed ballots.

Source: Investment managers

Significant voting examples

To illustrate the voting activity being carried out on our behalf, we asked the Plan's investment managers to provide a selection of what they consider to be the most significant votes in relation to the Plans funds. A sample of these significant votes can be found in the appendix.

Our 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 some of the engagement activity carried out by the Plan's material managers. The managers have provided information for the most recent calendar year available.

Funds	Number of engagements		Themes engaged on at a fund level
	Fund level	Firm level	
BlackRock Aquila World ex-UK Index S3 Fund*	1,184	2,373	Environment - Climate and Natural capital Social - Company impacts on people Governance - Board quality and effectiveness; Incentives aligned with financial value creation; Strategy, purpose and financial resilience
BlackRock Aquila Consensus S3 Fund*	1,490		
M&G Discretionary Fund S3	1,553 ¹	533	Environmental - Climate Change; Coal Policy; Water and others Social - Public health; Modern slavery/child labour; Ethics and others Governance - Executive Remuneration; Board Effectiveness; Composition and others

Source: Investment managers. *BlackRock did not provide fund level themes; themes provided are at a firm-level.

¹M&G fund level engagement numbers are for the period from 1 April 2025 to 31 March 2026 and the data is calculated by adding all funds engagement numbers within Prudential Discretionary Fund.

Data limitations

At the time of writing, BlackRock provided fund-level engagement information but not in the ICSWG engagement reporting template format, which our advisors consider to be industry standard. Additionally, the manager did not provide fund-level engagement themes.

We acknowledge that the concept of stewardship may be less applicable with respect to fixed income and property investments, particularly for short-term money market instruments and gilt investments. As such, this report does not include commentary on the Plan's gilt or cash investments because of the limited materiality of stewardship to these asset classes.

Appendix – Significant Voting Examples

In the table below are some significant vote examples provided by the Plan's managers. We consider a significant vote to be one which the manager considers significant. Managers use a wide variety of criteria to determine what they consider a significant vote, some of which are outlined in the examples below.

BlackRock Aquila World ex-UK Index S3 Fund	Company name	HCA Healthcare, Inc.
	Date of vote	24 April 2025
	Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	<i>Not Provided</i>
	Summary of the resolution	1. Amend patient safety and quality of Care Committee Charter 2. Report on healthcare consequences of acquisition strategy
	How you voted	Against
	Where you voted against management, did you communicate your intent to the company ahead of the vote?	No, BIS does not disclose its vote intentions in advance of shareholder meetings.
	Rationale for the voting decision	1. Company already has policies in place to address these issues. 2. The request is either not clearly defined, too prescriptive, not in the purview of shareholders, or unduly constraining on the company. Corporate policy decisions are best left to the board absent demonstrable harm to shareholders by prior board action or inaction. The board can be held accountable for its decisions through the election of directors.
	Outcome of the vote	Fail
	Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	Generally, BIS supports the vote recommendations of the board of directors and management. When we determine it is in our clients' financial interests to convey concern to companies through voting, we may do so in two forms: we might not support the election of directors or other management proposals, or we might not support management's voting recommendation on a shareholder proposal. In some cases, companies may request an engagement after a shareholder meeting to provide additional clarity. We value the opportunity to listen to company leadership, which enhances our understanding of their business models, ensuring that our proxy voting decisions are based on a comprehensive view on company practices and priorities. In these conversations, we do not direct companies on how they should manage their business. That responsibility lies with management, with input from the board.
	On which criteria have you assessed this vote to be "most significant"?	BIS prioritises its stewardship activities around themes on which the team most frequently engages companies, where these issues are relevant and represent a source of material business risk or opportunity. These themes are: board quality and effectiveness; strategy, purpose, and financial resilience; incentives aligned with financial value creation; climate and natural capital; and company impacts on people.

BlackRock Aquila Consensus S3 Fund		BIS has identified a population of shareholder meeting proposals that align with these themes and are therefore considered significant.
	Company name	Amazon Inc.
	Date of vote	21 May 2025
	Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	<i>Not Provided</i>
	Summary of the resolution	Report on impact of data centres on climate commitments
	How you voted	Vote against resolution
	Where you voted against management, did you communicate your intent to the company ahead of the vote?	No, BlackRock Investment Stewardship (BIS) does not disclose its vote intentions in advance of shareholder meetings.
	Rationale for the voting decision	The company already provides sufficient disclosure and/or reporting regarding this issue, or is already enhancing its relevant disclosures.
	Outcome of the vote	Fail
	Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	Generally, BIS supports the vote recommendations of the board of directors and management. When we determine it is in our clients' financial interests to convey concern to companies through voting, we may do so in two forms: we might not support the election of directors or other management proposals, or we might not support management's voting recommendation on a shareholder proposal. In some cases, companies may request an engagement after a shareholder meeting to provide additional clarity. We value the opportunity to listen to company leadership, which enhances our understanding of their business models, ensuring that our proxy voting decisions are based on a comprehensive view on company practices and priorities. In these conversations, we do not direct companies on how they should manage their business. That responsibility lies with management, with input from the board.
	On which criteria have you assessed this vote to be "most significant"?	BIS prioritises its stewardship activities around themes on which the team most frequently engages companies, where these issues are relevant and represent a source of material business risk or opportunity. These themes are: board quality and effectiveness; strategy, purpose, and financial resilience; incentives aligned with financial value creation; climate and natural capital; and company impacts on people. BIS has identified a population of shareholder meeting proposals that align with these themes and are therefore considered significant.
M&G Discretionary Fund S3	Company name	Apple Inc.
	Date of vote	05 February 2026
	Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	0.1%
	Summary of the resolution	Advisory vote to ratify named executive officers' compensation
	How you voted	Vote supporting resolution

Where you voted against management, did you communicate your intent to the company ahead of the vote?	<i>Not provided</i>
Rationale for the voting decision	A vote for this proposal is warranted, with caution. Total pay for the CEO and other NEOs is relatively high, and Short-Term Incentive Plan ("STIP") goal rigor concerns are noted. That said, outperformance was achieved and the bonus program was entirely based on pre-set financial goals. Further, CEO Cook's annual equity grant is predominantly performance-conditioned with a multi-year performance period. The performance goals in the "Long-Term Incentive ("LTI") are also rigorous, with a cap on the vesting percentage if absolute Total Shareholder Return ("TSR") is negative over the performance period. Continued monitoring of pay outcomes is warranted, particularly should company performance decline.
Outcome of the vote	<i>Not Provided</i>
Implications of the outcome e.g., were there any lessons learned and what likely future steps will you take in response to the outcome?	<i>Not provided</i>
On which criteria have you assessed this vote to be "most significant"?	Significant vote was determined by number of shares voted.

Source: Investment managers