

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

DC Structure implementation statement

This Implementation Statement ("the Statement") has been prepared by the Trustee and relates to the DC Structure of the Plan, covering both the Shift Pay Pension Plan (and relevant additional voluntary contributions) and members in the Defined Contribution (DC) New Joiners Benefit Structure.

This statement has been produced in accordance with The Pension Protection Fund (Pensionable Service) and Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018 and the guidance published by the Pensions Regulator. This Statement covers the Statement of Investment Principles ("SIP") in relation to the DC Structure only and any reference to SIP in this Statement will mean the SIP for the DC Structure. The Trustee has a separate SIP and relevant Implementation Statement for the DB Structure. The regulations state that the Statement must:

- Set out how, and the extent to which, in the opinion of the Trustee, the SIP has been followed during the year;
- describe any review of the SIP undertaken during the year, explain any change made to the SIP during the year and the reason for the change (or where no such review was undertaken during the year, state the date of the last review) (see the section entitled "SIP review and update" below); and
- Describe the voting behaviour by, or on behalf of, the Trustee (including the most significant votes cast by the Trustee or on its behalf) during the year and state any use of the services of a proxy voter during that year (see the section entitled "Voting Behaviour" below).

Based on regulatory requirements, the Statement will cover the period from 1 April 2021 to the end of the Plan's financial year on 31 March 2022.

The Statement is split into three sections:

1. An overview of the Trustee's actions and highlights during the period covered;
2. The policies set out in the Plan's SIP and the extent to which they have been followed in the reporting period, including the stewardship and engagement policies of the fund managers used by the Plan; and
3. The voting behaviour and significant votes undertaken by the fund managers on behalf of the Plan.

1. Overview of Trustee actions

During the relevant reporting period, the Trustee with support from the Plan's investment adviser:

1. Agreed the closure of the CNPP Property Fund and replacement Cash Fund in light of ongoing liquidity issues.
2. Approved the addition of the BlackRock ESG Strategic Growth Fund (white labelled as the CNPP ESG Multi-Asset Fund) to the Plan's self-select range.
3. Completed a market comparison of fees paid by CNPP members in the default arrangements. As a result, the Trustee was able to achieve a fee saving and tiered fee structure across the Plan's default funds to account for the growing assets under administration. The Trustee also achieved a fee reduction on a selection of the self-select funds.
4. Worked to align the Plan with the recommendations of the Task Force on Climate-related Financial Disclosures, including agreeing a governance structure for the oversight of climate-related risks in September 2021.

SIP review and update

The SIP was both reviewed and updated in September 2021 to:

- Outline changes made to the CNPP Property Fund and Replacement Cash Fund over the period.
- Strengthen wording regarding the Trustee's approach to monitoring and managing climate related risks.

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

Overview of Trustee actions (continued)

Financially material considerations

The Trustee has selected the LifePath Target Date Fund range by BlackRock (referred to as the manager below) as the default investment strategy for Plan members. This means that BlackRock has been delegated the responsibility of managing the mix of assets, where members' savings will be invested in, on a day-to-day basis.

The Trustee acknowledges that many members will have a long time until their retirement, therefore any investment decisions should be considered over a long period of time, with suitable growth targets across a range of asset types. The Trustee's long-term focus leads to the belief that, for investors, the most effective way of enforcing a strong ESG policy is through responsible ownership and proactive engagement with companies.

ESG integration

Within the default

BlackRock continue to develop how members' investments can be better positioned against potential risks arising from ESG factors. Part of this development has led to the introduction of the ACS World Small Cap ESG Screened Equity Fund and the iShares ESG Sterling Corporate Bond Index Fund into the LifePath strategies over the Plan year. The revised strategy now has c.63% exposure to ESG 'building blocks' and the Trustee is satisfied that members will benefit from explicit ESG risk management and continue to receive good value.

Within the self-select range

Over the period the Trustee agreed the addition of an ESG-focused fund to the Plan's self-select range, the BlackRock ESG Strategic Growth Fund. The Fund is to be white-labelled the CNPP ESG Multi-Asset Fund and will be added to the Plan's range following the end of the scheme year.

Non-Financial Factors

The Trustee continues to make one ethical fund available to members – the CNPP Sharia Law Fund.

The Default Investment Arrangement

During the scheme year, the Trustee reviewed on a quarterly basis, the performance of each fund against the stated performance objective for that fund. The most recent assessment as of the Plan Year was in Q1 2022. The Trustee concluded that the managers remained well suited for the purpose. The Trustee will continue to monitor the managers on a quarterly basis - considering both the funds' performance and other prevailing circumstances.

The last triennial review of the Plan's default investment options and self-select fund range was conducted by the Trustee in Q4 2020. Following the review, the Trustee was satisfied that both the default investment options and self-select fund range continue to remain suitable for the respective memberships of the Sections of the Plan. The next triennial review is scheduled for Q3/4 2023.

In light of the liquidity issues regarding the CNPP Property Fund, the Trustee reviewed the suitability of the Plan's Property Fund and considered alternative implementation routes in Q3 2021. At the time of the review the CNPP Property Fund remained suspended since the start of the Covid-19 pandemic due to the continuing suspension of one of the underlying funds, the Aviva Property Fund.

With the help of their adviser, the Trustee reviewed the Plan's self-select range and found it to be sufficiently broad without the inclusion of a property fund. For this reason, together with the liquidity issues with the CNPP Property Fund and the absence of a suitable alternative direct property fund on the Plan's platform, the Trustee agreed to close and remove the Fund from the Plan's self-select range.

Following the CNPP Property Fund's reopening in January 2022 the Trustee agreed to issue affected members a communication notifying them of the proposed change and giving them a month to select and alternate investment option. If members did not make an alternative choice within the month notice period, the Trustee agreed to move their savings to the members relevant default investment options. This also applies to members invested in the associated Replacement Cash Fund.

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

The communication was issued to members on the 26th of March 2022 with the switch of members funds scheduled for the 26th of April 2022.

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

2. Review of policies contained in the SIP

This section sets out a summary of the policies which form the Plan's SIP and the Trustee's opinion as to how and the extent to which those policies (and, consequently, the SIP) have been followed during this reporting period.

Policy	Has the policy been followed?	How has the policy been followed during the scheme year?
Primary objective		
<p>The Trustee believes that members should make their own investment decisions based on their individual circumstances. The Trustee's objective is therefore to make available a range of investment options that, whilst avoiding excessive complexity, should assist the members in achieving the following objectives:</p> <ul style="list-style-type: none">• Optimising the value of retirement benefits from the given contributions;• Protecting the value of those benefits in the years approaching retirement against market falls;• Protecting the value of those benefits in the years approaching retirement against fluctuations when turning fund values into retirement benefits; and• Tailoring their investments to meet their own needs.	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p><u>The Trustee continues to provide two default investment arrangements specific to the different needs of members in the New Joiners DC Structure and Shift Pay Pension Plan.</u></p> <p>Where the Default Options do not meet the needs of a wider cross-section of members, the Plan provides 12 self-select funds.</p> <p>This self-select range includes both passive and active funds covering multi-assets and single asset strategies as well as an option for members who wish to invest in accordance with Sharia Law.</p> <p>The last triennial review of the default investment options and self-select fund range was conducted by the Trustee in Q4 2020. The Trustee was satisfied that default investment options continue to remain suitable for the respective membership of the Plan. The next triennial review is scheduled for Q3/Q4 2023.</p>
Default arrangements		
<p>The main objective of the default arrangements is to support good member outcomes at retirement while subject to a level of investment risk appropriate to the majority of members who do not make active investment choices.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>The LifePath Funds are sets of Target Date Funds ("TDFs"), each managed to an asset allocation appropriate to its target retirement age range and retirement benefits.</p> <p>To reflect the different ways that members in the New Joiners DC Structure and SPPP sections are likely to access their retirement benefits, the default strategy for these sections differs, targeting income drawdown and cash at retirement respectively.</p> <p>The Trustee continues to receive regular reporting from its DC Investment Advisers, Redington, on the investment performance. Member outcome modelling is assessed using the PLSA Retirement Living Standards. Performance of the BlackRock LifePath funds returns (after charges) has been broadly in line with their respective objectives. Based on the Plan's membership this is a suitable</p>
<p>Manage the principal investment risks members face, gradually changing where they are invested as they approach retirement; and reflect that New Joiners DC Structure and Shift Pay Pension Plan ("SPPP") members are expected to choose different benefits at retirement.</p>		

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

Designing and maintaining a default arrangement meets the expected different benefits at retirement for the membership.		investment option with the propensity to deliver good retirement outcomes for members at competitive charges.
Choosing the default arrangements and other investment options		
<p>The Trustee believes that understanding the Plan's membership is essential to designing and maintaining a default arrangement which meets the needs of the majority of members.</p> <p>The Plan should offer members a choice of investment options because the default may: 1) not meet the needs of a wider cross-section of members; 2) members attitude to risk and needs for returns will vary from member to member.</p> <p>The Trustee reviews the range of funds available on a regular basis. These reviews will consider a range of inputs such as the changing composition of members and potential member feedback. Advice is received as required from professional advisers. In addition, the Trustee reviews the performance of the Plan's investments on a regular basis.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>The last triennial review of the Plan's default investment options was conducted by the Trustee in Q4 2020. The Trustee was satisfied that default investment options continue to remain suitable for the respective membership of the Plan. The next triennial review is scheduled for Q3/Q4 2023.</p> <p>The Trustee reviewed the self-select range twice over the Plan year in Q3 and Q4 2021. As a result of this review the Trustee agreed the following:</p> <ul style="list-style-type: none">1) Closure and removal of the CNPP Property Fund from the range due to ongoing liquidity issues with the fund and the absence of a suitable alternative.2) Closure and removal of the Replacement Cash fund, which had been where contributions were invested whilst CNPP Property Fund was suspended.3) Add the BlackRock ESG Strategic Growth Fund (white-labelled as the CNPP ESG Multi-Asset Fund) to the Plan to cater for the growing appetite of ESG-focused investing among members. <p>The implementation of these changes is to be completed following the end of the Plan year.</p> <p>Performance of the Plan's investments were reviewed on a quarterly basis during Investment Sub-Committee meetings.</p>
Kinds of Investments to be held		
<p>The investment managers may invest in UK and overseas investments including equities, property, fixed and index linked bonds and cash. However, the investments in each fund will depend on the nature of each fund, its objective and benchmark and the risk controls which operate.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>BlackRock as investment manager for the default investment options, make sure of the range of asset classes is as described in the Policy.</p> <p>In the Plan year to March 2022 the Trustee's Investment Sub-Committee, met on a quarterly basis to monitor, with the assistance of the Plan's investment advisers, how well each fund performed against its objective and relevant benchmark. Specifically, the Committee met on the 26th May, 22nd September, 14th December 2021 and 9th March 2022 to discuss this.</p>

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

Investment Risks		
<p>The Trustee believes that the three principal risks most members will face are: inflation risk, benefit conversion risk and volatility/market risk. The Trustee has developed and maintains a framework for assessing the impact of all investment risks on long-term investment returns.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>In the Plan year to March 2022 the Trustee received Quarterly Monitoring Reports from its DC Investment Adviser. These reports are centred around the monitoring framework that assesses the impact of all investment risks on long-term investment returns.</p> <p>This framework looks at member retirement outcome modelling, which considers the long-term investment returns in a base case and downside situations.</p> <p>These reports were discussed at their respective quarterly meetings on the 26th May 2021, 22nd September 2021, and 14th December 2021 and 9th March 2022. Following each discussion, the Trustee remained comfortable that the investment risks were suitably mitigated in the Plan's investments.</p>
<p>The default investment options manage the three main investment risks as members grow older by automatically switching from assets which are expected to give long-term growth relative to inflation into assets whose values should fluctuate less in the short-term relative to the benefits members are expected to take at retirement.</p>	<p>Yes, the Trustee is satisfied this policy has been followed.</p>	<p>The Plan continues to make use of target date fund structures to implement the default investment options for members.</p> <p>The last triennial assessment of the suitability of the default investment options, including the suitability of the automatic switching of assets (i.e. de-risking glidepath), was carried out in Q4 2020. The Trustee concluded, based on advice from the Plan's investment adviser, that the default options remain suitable for the membership of the Plan.</p> <p>The Trustee continues to monitor the target date fund structures as part of their quarterly monitoring and is satisfied the funds continue to work as expected and remain suitable for the membership of the Plan.</p>
<p>The self-select fund range provides members with a choice of funds with differing risk and return characteristics.</p>	<p>Yes, the Trustee is satisfied this policy has been followed.</p>	<p>The Trustee undertook two assessments of the self-select range over the Plan year in Q3 and Q4 2021. The reviews found that the range of self-select options offered covers all the main asset classes the Plan's investment adviser would typically expect, catering for members with varying risk appetites.</p> <p>Based on this assessment and with the advice of their adviser the Trustee agreed to:</p> <ol style="list-style-type: none"> 1) Close and remove the CNPP Property Fund from the range due to ongoing liquidity issues with the fund and the absence of a suitable alternative. 2) Add the BlackRock ESG Strategic Growth Fund (white-labelled as the CNPP ESG Multi-Asset Fund) to the Plan to cater for the growing appetite of ESG-focused investing among members. <p>The implementation of these changes is to be completed following the end of the Plan year.</p>

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

Review of policies contained in the SIP (continued)

Policy	Has the policy been followed?	How has the policy been followed?
Non-financial Factors		
The Trustee recognises that some members will have strong personal views on religious convictions that influence where they believe their savings should, or should not, be invested.	Yes, the Trustee is satisfied that this policy has been followed.	The Plan continues to make available a self-select fund appropriate for members with Sharia beliefs.
The Trustee will take into account what, in its reasonable opinion, members' views of non-financial factors are likely to be. Noting that the arrangements for receiving member feedback on the Plan in general gives members an opportunity to express views on non-financial factors relating to the Plan's investments.	Yes, the Trustee is satisfied that this policy has been followed.	The Plan continues to seek member feedback annually in the annual newsletter publication. During the Plan year, Aegon made DC presentations to employees and this was used as an opportunity to issue surveys for targeted member feedback. In total 23 presentations were completed over the Plan year to 31 March 2022.
Financially Material Considerations		
The Trustee regularly monitors the Plan's investments to consider the extent to which the investment strategy and decisions of the investment managers are aligned with the Trustee's policies,	Yes, the Trustee is satisfied that this policy has been followed.	Over the Plan year with the help of their adviser, the Trustee reviewed the ESG-focused funds available and agreed the addition of the BlackRock ESG Strategic Growth Fund to the Plan's self-select range. The Fund is to be white-labelled as the CNPP ESG Multi-Asset Fund. The addition of the fund reflects the Trustee's acknowledgement of growing appetite for ESG focused funds among members.
The Trustee recognises that the importance of financially material considerations, including ESG factors and climate risk and seeks to manage these risks and factors.		
		In line with the recommendations of the Task Force on

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

<p>The Trustee seeks to manage these financially material considerations, to protect long-term returns, by:</p> <ul style="list-style-type: none"> • Considering the extent to which ESG issues, including climate risk, where relevant, are integrated into the fund managers' investment processes and are satisfied that the fund managers follow an approach, which takes account of financially material factors; • For actively managed funds (where the fund manager decides where to invest), expect the fund managers to take financially material considerations into account when selecting which companies and markets to invest in; and • For passively managed funds, the Trustee recognises that the choice of benchmark dictates the assets held by the investment manager and that the manager has minimal freedom to take account of factors that may be deemed to be financially material. The Trustee accepts that the role of the passive manager is to deliver returns in line with the benchmark index (which may or may not include ESG factors) and believes this approach is in line with the basis on which their current strategy has been set. The Trustee will review periodically the choice of fund and index benchmarks used and the extent to which these reflect ESG factors. 	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>Climate-related Financial Disclosures, in September 2021, the Trustee – with the help of their advisers - agreed a governance structure for the oversight of climate-related risks and opportunities.</p> <p>In March 2022 the Trustee assessed the climate risk of the Plan's default funds – LifePath Flexi and Capital under three climate-related scenarios. The results of this are disclosed in the Plan's first annual Task Force on Climate-related Financial Disclosures ("TCFD") Report.</p>
<p>Implementation</p>		
<p>Before investing in any manner, the Trustee obtains and considers proper written advice from its investment adviser on the question of whether the investment is satisfactory, having regard to the need for suitable and appropriately diversified investments. The Trustee reviews the governing documentation associated with any new investment and will consider the extent to which it aligns with the Trustee's policies. Where possible, the Trustee will seek to amend that documentation so that there is more alignment.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>Over the Plan year the Trustee agreed the addition of the BlackRock ESG Strategic Growth Fund to the Plan's self-select range. In agreeing the addition, the Trustee received written advice from its investment adviser on the benefits of adding an ESG-focused fund to the self-select range and rationale for choosing the BlackRock ESG Strategic Growth Fund over other ESG-focused funds available to the Plan.</p>

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

The Trustee and the investment manager, to whom discretion has been delegated, exercise their powers (in line with the principles in the SIP) to encourage business strategies which should improve or protect the value of these investments where reasonably practicable.	Yes, the Trustee is satisfied that this policy has been followed.	Additional details are provided in the "Voting Behaviour" section of this Statement that highlights how the investment manager has encouraged business strategies, which should improve or protect the value of investments (where reasonably practicable).
When assessing a manager's performance, the focus is on longer-term outcomes, and the Trustee would not expect to terminate a manager's appointment based purely on short-term performance.	Yes, the Trustee is satisfied that this policy has been followed.	The Trustee has quarterly Investment Sub Committee meetings where their investment adviser shares an assessment of manager performance. To maintain the focus on long-term outcomes, these reviews are structured to show longer term performance (5-year, 3-year) before mention of shorter-term performance (12-month, 3-month).
The following steps are taken to encourage alignment between the Plan and the managers:	See 3 points below	See 3 points below
<ul style="list-style-type: none"> Before investing, the Trustee will seek to understand the manager's approach to ESG (including engagement and climate change). The Trustee has limited influence over managers' investment practices because all the Plan's assets are held in pooled funds. However, the Trustee will ensure the investment objectives and guidelines of the vehicle are consistent with its own objectives where practicable. 	Yes, the Trustee is satisfied that this policy has been followed.	Over the Plan year the Trustee agreed the addition of the BlackRock ESG Strategic Growth Fund to the Plan's self-select range. Before recommending the Fund, the Trustee's adviser reviewed the Fund's investment objectives and guidelines to ensure they were consistent with the Trustee's objectives.
<ul style="list-style-type: none"> To maintain alignment, managers are provided with the most recent version of the Plan's SIP, which includes the Trustee's policy on sustainable investment, on an annual basis and are required to explicitly confirm that the assets are managed in line with the Trustee's policies as outlined in those documents. 	Yes, the Trustee is satisfied that this policy has been followed.	Over the Plan year the Plan's SIP – including the Trustee's policy on sustainable investment – was shared with the Plan's manager.

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

<ul style="list-style-type: none">Should the Trustee's monitoring process reveal that a manager's portfolio is not aligned with the Trustee's policies, the Trustee will engage with the manager further to encourage alignment. This monitoring process includes specific consideration of the sustainable investment and ESG characteristics of the portfolio and managers' engagement activities. If, following engagement, it is the view of the Trustee that the degree of alignment remains unsatisfactory, the manager may be terminated and replaced.	Yes, the Trustee is satisfied that this policy has been followed.	The Trustee receives regular reporting from its investment adviser on its managers' portfolios. The Trustee found that BlackRock's portfolio was aligned with the Trustee's policies.
Additionally, the Trustee has a preference for fund managers who are signatories to the Financial Reporting Council's Stewardship Code in the UK and the United Nations supported Principles for Responsible Investment.	Yes, the Trustee is satisfied that this policy has been followed.	All fund managers used by the DC section are signatories to both the Financial Reporting Council's Stewardship Code in the UK and the United Nations supported Principles for Responsible Investment over the period of the Plan Year.

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

<p>Managers are paid an ad valorem fee, in line with normal market practice, for a given scope of services which includes consideration of long-term factors and engagement. The Trustee reviews the costs and value for money incurred in managing the Plan's assets annually, which includes the costs associated with portfolio turnover. In assessing the appropriateness of the portfolio turnover costs at an individual manager level, the Trustee will have regard to the actual portfolio turnover and how this compares with the expected turnover range for that mandate. On a quarterly basis the Trustee also monitors manager performance relative to the relevant benchmark, with a focus on long-term performance.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>Over the Plan year the Trustee, with the help of their adviser, undertook a market comparison of the fees paid by members in the default arrangement compared to the Department of Work and Pensions ("DWP") pension charges survey. The comparison found that CNPP's default fee was highly competitive in comparison to the market average for other types of workplace DC arrangements in the same membership bracket as the Plan (1,000+).</p> <p>The Trustee's adviser further engaged with Aegon, the Plan's platform provider, on the Trustee's behalf to achieve a fee structure to account for the Plan's growing asset base.</p> <p>Following this engagement, the Trustee achieved a fee reduction of 0.03% p.a. for the default funds (LifePath Flexi and Capital) to 0.23% p.a. The fee would further reduce to 0.21% and 0.18% p.a. once total assets under administration reach £900m and £1.2bn respectively.</p> <p>The Trustee also achieved a reduced fee for a selection of the self-select funds.</p> <p>The Trustee assessed the costs and value for money in preparing the Chair's Statement – a publicly available document on the Plan's website. Further details around the findings (including details on portfolio turnover costs) can be located on the Plan's website. Chair's Statements for earlier Plan years are publicly accessible through the document library on the Plan's website (www.cnpp.org.uk/document-library).</p> <p>In summary, the Trustee is comfortable with the costs incurred and continues to believe that CNPP offers value for money for members. The main reasons that the Trustee reached this conclusion are:</p> <ul style="list-style-type: none">• The continuation of strong governance and oversight from the Trustee Board, a competitive contribution structure and low charges.• The quality of the default investment options continues to improve with further ESG integration into the LifePath funds.• For Members who choose to self-select they continue to receive a competitive range of self-select investment options, including the upcoming addition of an ESG-focused fund.• In the context of the AVC assets, Prudential continues to offer one of the best performing and well rated with-profits funds, which represents good value for members of the Plan. <p>The costs associated with portfolio turnover are provided in the Chair's Statement – a publicly available document on the Plan's website. The Trustee is comfortable that these costs are aligned with the expected portfolio turnover costs for similar funds.</p> <p>The Trustee also monitors the manager performance relative to relevant benchmarks at quarterly Investment Sub-Committee meetings. To maintain the focus on long-term outcomes, these reviews are structured to show longer term performance (5-year, 3-year) before mention</p>
--	--	--

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

		of shorter-term performance (12-month, 3-month). The purpose of this monitoring is to ensure that the performance of the BlackRock LifePath funds returns (after charges) are broadly in line with their respective objectives.
Expected Return on Investments		
The objective of the equity, property, and multi-asset funds is to achieve an attractive real return over the long term. The objective of the cash and bond funds is to provide for the payment of the tax-free lump sum on retirement and to reduce the volatility of the cost of the annuity that may be purchased, rather than to achieve a specified 'real' or 'nominal' return.	Yes, the Trustee is satisfied that this policy has been followed.	<p>Over the Plan year to March 2022 the Trustee's Investment Sub-Committee received quarterly reporting from its DC investment advisers, Redington. These reports include long-term retirement outcome modelling that uses an expected return approach that is aligned with the asset class objectives detailed in the Trustee's SIP policy on expected returns.</p> <p>Each quarterly monitoring report was discussed at the respective Investment Sub-Committee meeting on <u>26th May 2021</u>, <u>22nd September 2021</u>, and <u>14th December 2021 and 9th March 2022</u>. Following these discussions, the Trustee's Investment Sub Committee remained comfortable that each of the asset class specific funds were performing in line with expectations.</p>

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

Realisation of Investments		
<p>The Trustee expect that the investment platform provider and the fund managers will normally be able to sell the funds within a reasonable timescale. There may, however, be occasions where the investment platform or fund managers needs to impose restrictions on the timing of sales and purchases of funds in some market conditions to protect the interest of all investors in that fund.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>During the Plan year the Trustee agreed to close and remove the CNPP Property Fund from the Plan's self-select fund due to ongoing liquidity issues prompted by the Covid-19 pandemic.</p> <p>Following the Funds reopening in January 2022, the Trustee agreed to issue affected members a communication notifying them of the proposed change and giving them a month to select and alternate investment option. If members did not make an alternative choice within the month notice period, the Trustee agreed to move their savings to the members relevant default investment options.</p> <p>The communication was issued to members on the 26th of March 2022 with the switch of members funds scheduled for the 26th of April 2022.</p> <p>.</p>
Balance of Investments		
<p>Overall the Trustee believes that the Plan's investment options:</p> <ul style="list-style-type: none"> • Provide a balance of investments; and • Are appropriate for managing the risks typically faced by members. 	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>The last triennial review of the default investment options and self-select range was conducted in Q4 2020 concluding that they remain suitable for the membership of the Plan. The next triennial review is scheduled for Q3/Q4 2023.</p> <p>In the meantime, the Trustee continues to review the default investment options on a quarterly basis. The Trustee undertook two assessments of the Plan's self-select range over the Plan year.</p> <p>Based on this assessment and with the advice of their adviser the Trustee agreed to:</p> <ol style="list-style-type: none"> 1) Close and remove the CNPP Property Fund from the range due to ongoing liquidity issues with the fund and the absence of a suitable alternative. 2) Add the BlackRock ESG Strategic Growth Fund (white-labelled as the CNPP ESG Multi-Asset Fund) to the plan to cater for growing appetite of ESG-focused investing among members. <p>The implementation of these changes is to be completed following the end of the Plan year.</p>

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

Stewardship		
<p>The Trustee recognises that an important part of their role as a steward of capital is to ensure the highest standards of governance and promotion of corporate responsibility in the underlying companies and assets in which the Plan invests, as ultimately this creates long-term financial value for the Plan and its beneficiaries. The Trustee recognises that good stewardship practices, including engagement and voting activities, are important as they help preserve and enhance asset value over the long-term.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>The Trustee is satisfied that BlackRock, through the work of their Investment Stewardship team, comply with the requirements in the Shareholder Rights Directive II relating to engagement with public companies and other parties in the investment ecosystem.</p> <p>The key responsibilities of BlackRock's Investment Stewardship Team are to:</p> <ul style="list-style-type: none"> (i) Engage with company leadership and vote on proxies to maximise long-term value for their client. (ii) Encourage business and management practices that support sustainable financial performance over the long-term. (iii) Work with BlackRock's various investment teams to provide insight on ESG considerations. (iv) Participate in market-level dialogue to understand and contribute to the development of policies that support sustainable long-term value creation. <p>In 2021, BlackRock's Investment Stewardship Team held more than 3,600 engagements with more than 2,300 unique companies across 57 markets.</p> <p>The responsibilities of BlackRock's Investment Stewardship Team, as outlined above, are aligned with the Trustee's policy to ensure high standards of governance and promote corporate responsibility. Reflecting the Trustee's belief that it may be appropriate for fund managers to engage with key stakeholders including corporate management, regulators and governance bodies.</p>

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

Voting and Engagement		
The Trustee has adopted a policy of delegating voting decisions on stocks to the underlying fund managers on the basis that voting power will be exercised by them with the objective of preserving and enhancing long term shareholder value. The fund managers are expected to exercise the voting rights attached to individual investments in accordance with their own house policy.	Yes, the Trustee is satisfied that this policy has been followed.	The Trustee continues to delegate voting decisions to underlying fund managers. Additional details on significant votes can be found in the "Voting Behaviour" section of this Statement.
Where relevant, the Trustee has reviewed the voting and engagement policies of the fund managers as well as the approach to governance of the investment platform provider and determined that these policies are appropriate. On an annual basis, the Trustee will request that the investment platform provider and fund managers provide details of any change in their house policy.	Yes, the Trustee is satisfied that this policy has been followed.	The Trustee's fund manager reviews and updates their "Global Principles and market-specific voting guidelines" on an annual basis. The aim of these annual updates is to reflect the continuous strengthening of the fund manager's stewardship practices. The Trustee Secretariat has a copy of the fund manager's summary of the latest annual update.
Where appropriate, the Trustee will engage with and may seek further information from the investment platform provider and fund managers on how portfolios may be affected by a particular issue. If an incumbent fund manager is found to be falling short of the Trustee's standards, the Trustee will undertake to engage with the fund manager and seek a more sustainable position.	Yes, the Trustee is satisfied that this policy has been followed.	The Trustee did not find cause to engage with the investment platform provider or investment managers for further information on how portfolios may be affected by particular issues.
Monitoring		
The Trustee receives reports from the investment platform provider on the fund managers voting activity on a periodic basis.	Yes, the Trustee is satisfied that this policy has been followed.	The Trustee receives voting reports from the investment platform provider at least annually and further details on the managers' voting activity relevant to this period can be found in the "Voting Behaviour" section of this Statement.
The Trustee reviews the fund managers' voting activity on a periodic basis in conjunction with the Plan's investment adviser and uses this information as a basis for discussion with the investment platform provider and fund managers. Where the Trustee deems it appropriate, any issues of concern will be raised with the manager for further explanation.	Yes, the Trustee is satisfied that this policy has been followed.	The Trustee has reviewed managers' voting activity and did not identify any issues of concern to be raised with the relevant managers.

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

<p>The Trustee meets with the investment platform provider on a regular basis. The fund managers may be challenged both directly by the Trustee and by the Plan's investment advisers on the impact of any significant issues including, where appropriate, ESG issues that may affect the prospects for return from the portfolio.</p>	<p>Yes, the Trustee is satisfied that this policy has been followed.</p>	<p>The investment adviser has regular engagement and meetings with the investment platform provider on behalf of the Trustee.</p>
---	--	---

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

Review of policies contained in the SIP (continued)

Policy	Has the policy been followed?	Evidence
Voting		
The fund managers are expected to exercise the voting rights attached to individual investments in accordance with their own house policy. The Trustee aims to review engagement activity undertaken by the fund managers as part of its broader monitoring activity.	Yes, the Trustee is satisfied that this policy has been followed.	The Trustee was provided with voting reports relating to the period of the SIP. (See the section entitled "Voting behaviour")
Where appropriate, the Trustee will engage with and may seek further information from the Investment platform provider, fund managers on how portfolios may be affected by a particular issue. The Trustee does not engage directly, but believes it is sometimes appropriate for the fund managers to engage with key stakeholders which may include corporate management, regulators and governance bodies, relating to their investments in order to improve corporate behaviours.		

Stewardship and Engagement

The Trustee, without prejudice, delegates to the manager the responsibility for the stewardship activities that apply to the Plan's investments. The Trustee expects the manager to exercise their voting powers with the objective of preserving and enhancing long-term shareholder value.

Use of Proxy Voting Services

Due to the delegation of responsibility for the stewardship activities to underlying asset managers, any use of proxy voting services on the Trustee's behalf is at the respective asset managers' discretion. The Trustee does not appoint or utilise a dedicated proxy voting service provider.

Investment Stewardship Engagements

The Trustee recognises that stewardship encompasses the exercise of engagement with the companies in which the Plan invests, as this can improve the longer-term returns of Plan's investments. The Trustee notes that sustainable financial outcomes are better leveraged when supported by good governing practices, such as board accountability.

Long-term perspective on the Plan's member's assets

In the Statement of Compliance for Shareholder Rights Directive II ('SRD II'), BlackRock states, "BlackRock takes a long-term perspective in its investment stewardship work informed by two key characteristics of our business:

- The majority of end beneficiaries are saving for long-term goals so the Trustee presumes they are long-term shareholders; and
- The majority of equity holdings are invested in index-tracked portfolios, so end beneficiaries are, by definition, are long-term shareholders."

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

The Trustee finds that BlackRock is well positioned to protect and enhance the long-term value of members' assets. Notably BlackRock has confirmed that they are enhancing their reporting and level of voting and engagement disclosures. They have focussed their improvement on three key themes:

- Moving from annual to quarterly voting disclosure
- Prompting disclosure around key votes including an explanation of their voting decisions, and
- Enhancing disclosure of their company engagements.

The topics listed below highlight the engagement themes that have been prioritised by BlackRock during the reporting period to encourage good governance practices and to deliver long-term financial performance.

Lifepath Flexi Fund

Top Engagement Topic	Times Discussed
Governance	
Board Composition and Effectiveness	1,056
Corporate Strategy	848
Remuneration	764
Environmental	
Climate Risk Management	1,024
Operational Sustainability	728
Social	
Human Capital Management	621

CNPP UK Equity Fund

Top Engagement Topic	Times Discussed
Governance	
Board Composition and Effectiveness	1,415
Corporate Strategy	1,166
Remuneration	1,061
Environmental	
Climate Risk Management	1,446
Operational Sustainability	1,053
Social	
Human Capital Management	840

CNPP Global Equity Fund

Top Engagement Topic	Times Discussed
Governance	
Board Composition and Effectiveness	919
Corporate Strategy	766
Remuneration	763
Environmental	
Climate Risk Management	988
Operational Sustainability	733
Social	
Human Capital Management	586

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

CNPP Global Equity (ex UK) Fund

Top Engagement Topic	Times Discussed
Governance	
Board Composition and Effectiveness	668
Corporate Strategy	580
Remuneration	528
Environmental	
Climate Risk Management	751
Operational Sustainability	531
Social	
Human Capital Management	493

CNPP Emerging Markets Equity Fund

Top Engagement Topic	Times Discussed
Governance	
Board Composition and Effectiveness	251
Corporate Strategy	246
Remuneration	118
Environmental	
Climate Risk Management	285
Operational Sustainability	219
Social	
Human Capital Management	199

BlackRock's Investment Stewardship ("BIS") team's approach is in line with the Trustees investment policies.

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

3. Voting Behaviour

Voting

The Plan invests in pooled fund arrangements, and as such, it is not necessary for managers to consult with the Trustee before voting. However, as part of its wider due diligence of the implementation of investment strategies, the Trustee asks the managers to produce information that demonstrates the manager is exercising good stewardship.

Year to:	CNPP Global Equity (ex UK) Fund	CNPP Global Equity Fund	CNPP UK Equity Fund	CNPP Emerging Markets Equity Fund
Number of meetings at which eligible to vote	1972	2621	754	2526
Number of resolutions on which eligible to vote	24008	33368	10693	21938
Proportion of eligible resolutions on which voted	99%	99%	100%	100%
Of the resolutions on which you voted, what % did you vote with management?	92%	92%	94%	89%
Of the resolutions on which you voted, what % did you vote against management?	7%	7%	5%	10%
Of the resolutions on which you voted, what % did you abstain from voting?	0%	0%	0%	3%
Which proxy advisory services does your firm use, and do you use their standard voting policy or created your own bespoke policy which they then implemented on your behalf?	BlackRock use Institutional Shareholder Services' (ISS) electronic platform to execute their vote instructions, manage client accounts in relation to voting and facilitate client reporting on voting. In certain markets, they work with proxy research firms who apply their proxy voting guidelines to filter out routine or non-contentious proposals and refer to them any meetings where additional research and possibly engagement might be required to inform their voting decision.			

Most Significant Votes

BlackRock takes a thematic approach towards voting and engagement. The 5 themes that BlackRock prioritised in their voting behaviour over the Plan year were:

- Board Quality
- Environmental Risks and Opportunities
- Corporate Strategy and Capital Allocation
- Compensation that promotes long-termism
- Human Capital Management

Therefore, the most significant votes cast by the asset manager on behalf of the Trustee will relate to both some of the largest holdings as well as relevance to the 5 key themes listed above.

Below are the examples of the most significant votes – as defined by BlackRock – cast over the period, split by fund. All first-person references (e.g. to us, we, our etc.) in the tables below will refer to BlackRock and their views as opposed to those of the Trustee of CNPP.

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

LifePath Flexi Fund – Most Significant Votes

Company:	WOODSIDE PETROLEUM LTD.
Date:	15 th April 2021
Resolution:	Item 2a: Elect Christopher Haynes as Director
BlackRock Vote:	BlackRock voted AGAINST Item 2a
Rationale:	<p>BlackRock Investment Stewardship (“BIS”) voted AGAINST the longest serving director up for re-election given concerns about the comprehensiveness of the company’s current climate risk disclosure. Currently, the company provides an integrated annual report and separate Sustainable Development Report (“SDR”). The annual report aligns with the four pillars of the TCFD, while the SDR includes reported scope 1, 2 and 3 emissions and scope 1 and 2 emissions reduction targets of 15% and 30% by 2025 and 2030 respectively. However, the company does not provide scope 3 emissions reduction targets. As discussed in BIS’s commentary, “Climate risk and the transition to a low-carbon economy”, BIS looks for companies in carbon intensive industries to disclose scope 3 emissions reduction targets as it is particularly important for investors to understand the complete emissions profile of carbon-intensive companies as the world transitions to a low carbon economy. As a result, BIS voted against the longest-serving independent director up for re-election (in lieu of a vote against the sustainability chair who was not up for election) to hold the company accountable for inadequate progress on scope 3 target setting.</p>

Company:	JBS, S.A.
Date:	28 th April 2021
Resolution:	Item 1: Approve financial statements and statutory reports for fiscal year ended December 31, 2020
BlackRock Vote:	BlackRock ABSTAINED from voting on the approval of the company’s financial statements
Rationale:	<p>BIS ABSTAINED from voting JBS’ financial statements to preserve the legal rights of shareholders, because we remain concerned that the financial position of the company may be meaningfully impaired by the investigation proceedings related to allegations of bribery, corruption, and anti-competitive practices involving J&F and the Batista family, JBS’ controlling shareholders. Our concerns are informed in part by fact that, despite the unqualified opinion of an independent external auditor, they could not give assurance that there would be no new information arising from the investigation that might impact the company’s financial statements in the future. Grant Thornton Auditores Independientes, the independent external auditor, issued an unqualified opinion, concluding that JBS’ financial statements present fairly the financial position of the company. However, the findings also highlighted that the investigation proceedings– related to allegations of bribery, corruption, and anti-competitive practices by senior executives at J&F, and that led the company and its subsidiaries to enter a Plea Bargain Agreement and a Leniency Agreement with Brazilian and U.S. authorities – represent key audit matters. The auditor concluded that the risks and uncertainties involved in the process may prevent it from obtaining assurance that “no new facts will come into light” that may impact the financial statements to date. Other key audit matters highlighted by the auditor are related to donations to mitigate the impact of COVID-19, impairment of assets, and the overall group and subsidiaries’ audited financial statements. As such, BIS abstained from voting the financial statements.</p>

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

Company:	VALE, S.A.
Date:	30 th April 2021
Resolution:	<u>Item 1: Individual elections of members of the Board of Directors recommended by the Nominating Committee and Board of Directors (featuring contested elections by minority shareholders)</u>
BlackRock Vote:	BlackRock voted FOR the candidates recommended by the Nominating Committee and Board of Directors.
Rationale:	<p>The company nominated 12 directors to compose Vale's Board of Directors in the 2021-2023 term, as recommended by the Nominating Committee and the Board of Directors. Most candidates are independent. In addition, three candidates are women and four are non-Brazilian. Five of the 12 nominated directors are newly proposed directors. Of note, Vale's management has provided a detailed biography containing the qualifications and experience of the 12 nominees for election to the Board – clearly articulating how each will provide quality support to and oversight of management, in light of Vale's business strategy and future needs.</p> <p>Alternatively, minority shareholders nominated four separate independent directors, – one former Vale director, one former CEO of Brazil's state-owned oil and gas company Petroleo Brasileiro, S.A. (Petrobras), and two other independent candidates. The minority shareholders did not provide any disclosure or public assessment articulating the professional and personal qualifications of the nominees that would enable them to contribute to and enhance the board. As detailed in the BIS Global Principles, when nominating new directors to the board, there should be detailed information on the individual candidates in order for shareholders to assess the suitability of an individual nominee and the overall board composition. These disclosures should give a clear sense of how the collective experience and expertise of the board aligns with the company's long-term strategy and business model.</p>

Company:	BP PLC
Date:	12 th May 2021
Resolution:	Item 13: Approve Shareholder Resolution on Climate Change Targets
BlackRock Vote:	BlackRock voted FOR the shareholder resolution on climate change targets (Item 13)
Rationale:	<p>BIS voted for this shareholder resolution. While recognizing the company's efforts to date and direction of travel, supporting the resolution signals our desire to see the company accelerate its efforts on climate risk management.</p> <p>The shareholder resolution requested that the company "set and publish targets that are consistent with the goal of the Paris Climate Agreement: to limit global warming to well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C. These quantitative targets should cover the short-, medium-, and long-term greenhouse gas (GHG) emissions of the company's operations and the use of its energy products (Scope 1, 2 and 3). Shareholders request that the company report on the strategy and underlying policies for reaching these targets and on the progress made, at least on an annual basis, at reasonable cost and omitting proprietary information."</p> <p>We believe that BP is substantially already aligned with the ask of the resolution and should continue to progressively refine its GHG emissions reduction targets. Currently, the company has set an ambition to be net zero by 2050 or sooner, which includes short-, medium and long-term scope 1, 2 and 3 emissions reduction targets. For scope 3, BP aims to reduce the carbon intensity of the products it sells by 50% by 2050 or sooner. In addition, the company plans to increase the proportion of investment in non-oil and gas businesses, and to reduce the methane intensity of its operations by 50%. Furthermore, the company aligns its reporting with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) and the sector-specific standards of the Sustainability Accounting Standards Board (SASB). BP's climate strategy is consistent with our belief that the companies that critically evaluate their current baseline, set rigorous GHG emissions</p>

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

reduction targets, and act on an accelerated timeline are those most likely to avoid operational disruption in the future. Nonetheless, it is still early days and the company will need to continue to clarify and demonstrate continued progress on its communicated goals to shareholders. For example, we believe that investors would benefit from having greater specificity around what constitutes targets aligned with the Paris Agreement. We recognise that these methodologies are emerging, and we think that organisations like the Science-Based Targets Initiative will have an important role to play in defining the 'right' transition pathways for large energy companies. We think this will be essential to achieving broad-based support for transition strategies for large energy companies. Supporting this resolution signals our belief that BP has a credible climate strategy which it needs to implement and continue to refine as the industry's understanding of the necessary transition pathways advances.

Company:	BOOHOO GROUP{ PLC
Date:	18 th June 2021
Resolution:	Item 4: Re-elect Carol Kane as Director
BlackRock Vote:	BlackRock voted AGAINST Item 4
Rationale:	<p>BIS voted against the re-election of this executive director to signal our concerns about governance and board oversight related to the findings of the independent review.</p> <p>Ordinarily, when assessing our voting decisions regarding the (re)election of directors, we would limit our considerations to non-executive directors whom we consider the primary actors accountable to shareholders (including for the appointment/removal of executives). In this case, however, the company is listed on the AIM segment of the London Stock Exchange and has chosen not to comply voluntarily with the UK Corporate Governance Code. As a result, it does not put all directors up for re-election annually. In our recent engagements with the Board, we encouraged the company to move to fully adhere with the UK Corporate Governance Code, but the result this year was that the only non-executive directors on the ballot were those appointed after the supply chain issues came to light.</p> <p>In the absence of a vote on the re-election of non-executive directors, and given the severity of the lapses in business practice confirmed in the independent review, we voted against Carol Kane, the co-founder and former co-CEO who serves on the board as an executive director. This vote reflected our view that there needed to be accountability at the board level for the poor oversight and practices that resulted in the recent controversies and related value destruction. We also consider this consistent with the demonstrable governance change necessary to support the company's remediation actions as set forth in the Agenda for Change program. We note the extent to which the company's longer-serving leaders were implicated by the independent review in the company's failure to manage the issues in its supply chain. We also note that they should have moved more quickly to address these issues. Even though Ms. Kane is a co-founder of the company, given this history it does not seem appropriate for her to remain on the board, or necessary for her to be an effective executive. Her stepping down and being succeeded by a fully independent newly appointed director would facilitate a meaningful change that will assist with a renewed approach to board oversight. We recognise the implications this would have for diversity on the company's board, given Ms. Kane is the only female director, and believe the board should enhance its diversity through its next appointments. We also believe governance would be improved by having annual elections for all directors to provide shareholders the ability to hold relevant directors accountable and have urged the company to review its approach.</p>

COMBINED NUCLEAR PENSION PLAN

TRUSTEE'S REPORT YEAR ENDED 31 MARCH 2022

ACS 5050 Global Equity Fund – Most Significant Votes

Company:	VINCI SA
Date:	8th April 2021
Resolutions:	Item 11: Advisory opinion on the Company's environmental transition plan
BlackRock Vote:	BlackRock voted FOR this item because it provides a clear roadmap towards the company's stated climate ambitions and targets
Rationale:	<p>VINCI's environmental transition plans meets BIS' expectations that companies have clear policies and action plans to manage climate risks and to realize opportunities presented by the global energy transition. The company provides scope 1, 2 and 3 greenhouse gas (GHG) emissions reduction targets to 2030, in addition to targets to enable a circular economy and preserve natural habitats. On the latter, for companies whose business models have material dependencies or impacts on natural capital, BIS believes that the management of these factors can be a defining feature in their ability to generate long-term, sustainable value for shareholders. Through this disclosure, the company has presented investors with a roadmap towards its stated climate ambitions and, crucially, the mechanisms and strategies which the company will utilize to achieve these targets. Moreover, the company has committed to provide annual updates, which will give investors the opportunity to measure progress as well as provide timely feedback.</p> <p>Notably, the company makes clear that the advisory nature of this vote is necessary "in order to respect the remits of VINCI's corporate bodies. Specifically, shareholders are not being asked to take responsibility for approving or rejecting VINCI's environmental transition plan; oversight and management of this plan remain the responsibility of the board and executive management. BIS agrees with and supports this clear delineation in the roles and responsibilities of shareholders and the board/executive management. On balance, while BIS is supportive of this "say on climate" proposal for the reasons stated above, we will continue to monitor the company's progress on the environmental transition plan and hold its directors responsible by voting against the re-election of board members should we have concerns with planning, implementation or disclosures.</p>

Conclusion

Overall, the Plan has demonstrated key actions by the Trustee during the relevant reporting period that highlight how it continues to make investment decisions in line with the policies set out in the SIP.

From a stewardship and engagement perspective, the Plan is limited in its scope to directly influence how asset managers invest and engage with underlying companies due to the use of pooled funds to implement the Plan's investments.