

Implementation Statement

Martin-Baker Pension Scheme

Purpose of this statement

This implementation statement has been produced by the Trustees of the Martin-Baker Pension Scheme ("the Scheme") to set out the following information over the year to 30 September 2025:



How the Trustees' policies on exercising rights (including voting rights) and engagement activities have been followed over the year;



The voting activity undertaken by the Scheme's investment managers on behalf of the Trustees over the year, including information regarding the most significant votes.



Conclusions

Overall, the Trustees do not have any material concerns with the ESG and Stewardship activities of the Scheme's holdings

Stewardship policy

The Trustees decided not to set stewardship priorities for the Scheme following the purchase of a bulk annuity policy with Aviva (the "Insurer") on 8 May 2025, insuring all the Scheme's defined benefit liabilities. As at 30 September 2025, the Trustees hold no other investments beyond cash in the Scheme bank account, a holding in the L&G Sterling Liquidity Fund and a residual investment in the M&G UK Property Fund, which is in liquidation. The day-to-day management of the assets held is delegated to Legal & General Investment Management and M&G respectively. As such, the Trustees have limited ability to influence the voting and engagement activities undertaken

The Trustees' Statement of Investment Principles (SIP) was last reviewed in May 2025 and has been made available online here:

<http://www.martinbakerpensions.com/statement-of-investment-principles/>

Trustees' policy on voting and engagement

The L&G Sterling Liquidity Fund and the bulk annuity policy with Aviva held by the Scheme have no voting rights attached and a limited ability to engage with key stakeholders, given the nature of these mandates. The M&G UK Property Fund is in liquidation, with limited opportunities for voting and engagement. Voting and engagement data has therefore not been provided.

At a firm level, Aviva has its own stewardship policy which sets out its approach to responsible investing within their investment portfolio. There is limited scope for the Trustees to report on their process but Aviva's policies are available here: [Responsible investment - Aviva plc](#)

Prepared by the Trustees of the Martin-Baker Pension Scheme

November 2025

Voting data

There were no voting rights attached to any of the investments the Scheme held over the period covered by this statement, and so no voting data (including data on significant votes) is available for the period.

Fund level engagement

The table below provides a summary of the engagement activities undertaken by L&G and M&G at a firm-level over the year to 30 September 2025. Fund-level information is not available for the L&G Sterling Liquidity Fund due to the nature of the underlying holdings, and the M&G Property Fund is not shown because the Fund is in the process of liquidating.

Manager	L&G	M&G
Fund name	Sterling Liquidity Fund	UK Property Fund
Number of engagements on behalf of the holdings in this fund in the year	n/a	n/a
Number of entities engaged at a firm level in the year	3,252	229

Examples of firm level engagement activity undertaken over the year to 30 September 2025

The table below provides an example engagement undertaken for both L&G and M&G at the firm-level over the year to 30 September 2025.

Manager and mandate	Example engagement
Legal and General	Engagement Case Study: The Living Wage Legal & General (L&G), through its investment arm, launched an engagement campaign targeting 15 of the world's largest food retailers, with the aim of encouraging adoption of the living wage for employees within their own operations and supply chains. L&G made clear that if companies did not demonstrate improvement after engagement, it may vote against the re-election of the Chair at 2025 AGMs. Positive developments were seen at firms such as Coles, Sainsbury's and Seven & I Holdings, showing that progress towards the living wage is possible. L&G co-filed living wage shareholder resolutions at Walmart, Kroger and Target in 2024 to raise awareness at board level. After some companies were taken over and investments changed, the campaign now involves 12 companies. For those that have had AGMs in 2025 so far, L&G voted against the Chair at Target, Kroger, AEON and Walmart, and voted against the Chair's compensation at Carrefour, where the Chair was not up for re-election. L&G also supported shareholder resolutions on the living wage at Next, JD Sports and Marks & Spencer, seeking greater transparency in pay and human capital management. The rationale included better understanding workforce turnover and retention, as well as risks related to human rights among contractors, particularly in the UK context. Progress at several companies and a rise in shareholder activity reflect increased investor awareness of the issue. L&G intends to continue direct and collaborative engagement on the living wage, aligning voting behaviour with published stewardship policies.

Manager and mandate	Example engagement
M&G Investments	Engagement Case Study: BHP Billiton Finance (USA) Ltd M&G engaged with BHP Billiton Finance (USA) Ltd to encourage the company to set targets for scope 3 emissions, provide updates on their progress phasing out thermal coal, and improve the transparency of their capital allocation relating to decarbonisation. This engagement was chosen to demonstrate alignment with M&G's investment policy on climate change and to show clear outcomes. During the engagement, M&G held meetings with the Head of Climate Risk and the Vice President of ESG (Investor Relations) at BHP, making clear their expectations on disclosure and climate targets. M&G took a leading role, communicating directly with senior decision-makers. As a result, BHP committed to reaching net zero for scope 1 and 2 greenhouse gas emissions by 2050, including a target to reduce these emissions by 30% from a 2020 baseline by 2030. BHP introduced a net zero ambition for scope 3 emissions by 2050, and set goals for 2030 emissions reduction in both steelmaking and shipping, with external organisations confirming these are consistent with a 1.5°C pathway. The company confirmed it would fully exit thermal coal by 2030, publicly shared its exit plan, and responded to M&G's feedback by improving disclosure on capital allocation. BHP committed US\$4bn through to FY2030 to deliver its operational decarbonisation plans and clarified the distinction between formal targets and aspirational goals. M&G will continue to monitor BHP's progress and consider further actions if necessary.