

Implementation Statement

Statement of Compliance with the Sun Life Assurance Company of Canada 1988 UK and Irish Employee Benefit Scheme's Stewardship Policy for the year ending 31 December 2025

Introduction

This is the Trustees' statement prepared in accordance with the requirements of the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019. This statement sets out how the Trustees have complied with their Stewardship Policy during the period from 1 January 2025 to 31 December 2025. Given the residual assets held in the Scheme, this Implementation Statement is intentionally brief.

Stewardship policy

The Trustees' Stewardship Policy sets out how the Trustees will behave as an active owner of the Scheme's assets, which includes the Trustees approach to:

- the exercise of voting rights attached to assets, where relevant; and
- undertaking engagement activity, including how the Trustees monitor and engage with their investment managers and any other stakeholders.

The Scheme's Stewardship Policy is reviewed on an annual basis in line with the Scheme's Statement of Investment Principles ("SIP") review which was last completed on 2 June 2025.

There were no changes made to the Stewardship Policy during the past year.

The Scheme's Stewardship Policy can be found within the SIP, publicly available [here](#).

The Scheme's assets consist of insurance policies which form majority of the Scheme's assets, and a portfolio of residual assets managed by Insight Investment ("Insight"), made up of physical gilts, money-market securities, and cash. Within this asset mix, the Scheme holds no assets which confer any applicable voting rights.

The Trustees have delegated any engagement activity in respect of the asset portfolio to the Scheme's investment managers. The Trustees believe it is important that their investment managers take an active role in the supervision of the companies in which they invest, by engaging with the management on issues which affect a company's financial performance, for instance, any issuers in the money-market securities.

Engagement activity

The Trustees own engagement activity is focused on their dialogue with their investment managers which is undertaken in conjunction with their investment advisers. The Trustees meet periodically with their managers and during such meetings consider how managers have exercised their stewardship responsibilities.

During the year covered by this statement, the Trustees met with Insight twice at Investment Sub-Committee ("ISC") meetings. Discussions with Insight cover a wide range of topics including a review of short- and long-term performance in the market context, market outlook, risks and opportunities, and responsible investing. At the September 2025 meeting, the Trustees also reviewed Insight's engagement case studies and ESG metrics for the year with the support of their investment adviser.

The Trustees also monitor their own compliance with their Stewardship Policy on a regular basis and are satisfied that they have complied over the last year.

The Trustees' insurance policies are held with Pension Insurance Corporation ("PIC") and Rothesay Life. These insurers were invited to the Trustee ESG day on 20 February 2025 to discuss their investment processes including ESG-integration and policies in detail. The Trustees note there is limited scope to engage with insurers due to the nature of the annuity policies.