

## Implementation Statement

# Oldrid & Company Limited Retirement Benefits Scheme

### Purpose of this statement

This implementation statement has been produced by the Trustee of the Oldrid & Company Limited Retirement Benefits Scheme ("the Scheme") to set out the following information over the year to 31 January 2025:

- How the Trustee's policies on exercising rights (including voting rights) and engagement activities have been followed over the year; and
- The voting activity undertaken by the Scheme's investment manager on behalf of the Trustee over the year, including information regarding the most significant votes.

### Stewardship policy

The Trustee's Statement of Investment Principles (SIP) in force at 31 January 2025 describes the Trustee's stewardship policy on the exercise of rights (including voting rights) and engagement activities. It was last reviewed in January 2025 and has been made available online here:

<https://www.downtownstores.co.uk/userfiles/file/oldrid--co.-ltd-retirement-benefits-scheme---statement-of-investment-principles.pdf>

The following changes were made to the stewardship policy over the year:

- The benefits due from the Scheme were fully matched with annuity policies and the remaining assets are held as cash on deposit. Given the nature of the current holdings in the Scheme, the Trustee will review and monitor the ESG policy as it deems appropriate, considering the risks that present themselves.
- The Trustee notes that by securing the Scheme's benefits with an insurer, it has limited ability to influence the voting and engagement activities undertaken on behalf of the annuity policy. The Scheme retains a cash holding in a bank account through which there is limited ability for engagement.

The Trustee decided not to set stewardship priorities for the Scheme following the completion of a bulk annuity insurance transaction with Aviva ("the Insurer") given the above.

### How voting and engagement/stewardship policies have been followed

The Trustee believes that its policies on voting and engagement have been met in the following ways:

- The Scheme invests entirely in cash and bulk annuity policies, and as such delegates responsibility for carrying out voting and engagement activities to the Insurer.

- Given the nature of the current holdings in the Scheme, the Trustee has a policy to review and monitor the ESG policy as it deems appropriate, considering the risks that present themselves.
- Having reviewed the above in accordance with its policies, the Trustee is comfortable that the Scheme's voting and engagement policies have been met.

**Prepared by the Trustee of the Oldrid & Company Limited Retirement Benefits Scheme**

**July 2025**

## Voting data

The cash holdings and annuity policies held by the Scheme with Aviva ("the Insurer") as at year-end have no voting rights attached. The Scheme did hold investments with voting rights attached for part of the period through holdings with Schroders Investment Management Limited ("Schroders") before fully disinvesting in January 2025 (with a nominal amount of residual assets settling in May 2025).

For completeness, examples of significant votes have been included for these holdings below. Schroders have provided a selection of votes which they believe to be significant. In the absence of agreed stewardship priorities / themes, the Trustee has selected a vote for each fund with voting rights to represent what it considers the most significant votes cast on behalf of the Scheme.

Fund	QEP Global Core Equity Fund	Diversified Growth Fund
Scheme disinvestment date	May 2025	May 2025
Company name	Lennar Corp.	Emerson Electric Co.
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	Not provided	Not provided
Summary of the resolution	Shareholder proposal regarding report on aligning greenhouse gas ("GHG") reductions with Paris Agreement	Advisory vote on executive compensation
How the manager voted	For	Against
Rationale for the voting decision	Schroders voted for as they are keen to see the company develop their emission reduction targets to help shareholders better understand their progress towards a net zero transition. They believe their vote is in the best financial interest of their clients' investments.	Schroders voted against due to concerns that the threshold targets were set below median performance, indicating a lack of ambition. Additionally, they cited the excessive reliance on Earnings per Share ("EPS") in variable pay plans and insufficient disclosure of performance targets across these awards.
Outcome of the vote	Not provided	Not provided
Implications of the outcome	Not provided	Not provided
Criteria on which the vote is considered "significant"	Voted against management on a climate-related proposal	Voted against management on a governance-related proposal

Source: Schroders

## Engagement data

With regards to the cash holdings and annuity policies held by the Scheme with the Insurer as at year-end, the Trustee has limited ability to engage with key stakeholders given the nature of the mandate. Engagement activities are limited for the Scheme's cash funds given that they are held as cash on deposit.

At a firm level, Aviva have their own stewardship policy which sets out their approach to stewardship within their investment portfolio. There is limited scope for the Trustee to report on their process.

The Scheme did hold investments with Schroders for part of the period before fully disinvesting, with Schroders engaging with their investee companies on behalf of the Trustee. For completeness, we have provided a firm-level example of such an engagement below:

**Manager:** Schroders

**Funds held:** QEP Global Core Equity Fund, Diversified Growth Fund, Matching Plus B&M Credit Sterling Cashflow Funds

**Company:** Meta

Schroders' digital rights and governance engagement with Meta is an example of cross-thematic collaborative engagement. Engagement began in 2018 on GDPR issues and has since focused on content moderation policies and practices. Schroders expects companies to respect consumer rights and consider the human rights impact of technologies like Artificial Intelligence ("AI").

One short- to mid-term action is to establish responsible AI use policies aligned with OECD Principles. In March 2024, Schroders joined a group investor call on Meta's human rights saliency assessment, discussing policies, training, and the need for better resourcing in smaller language markets. At the May 2024 AGM, Schroders asked about harm concentration and geographic disclosure but received no response. In November 2024, they joined another call discussing conflicts between human rights and business goals, crisis protocols, compensation links and AI use. Later in the year, engagement expanded to governance, including the role of the Lead Independent Director and dual class share structure.

Meta acknowledged shareholder concerns and emphasized the founder's long-term vision. Schroders appreciates the company's willingness to engage and continues to hold Meta, monitoring progress on content moderation, disclosure, board independence and responsible AI use.

*Source: Schroders*