

## Irish Ferries (UK) Limited Pension Scheme

# Annual Implementation Statement

### Scheme year ending 30 September 2025

#### 1 Introduction and purpose of this Statement

1.1 This document is the Annual Implementation Statement (“the Statement”) prepared by the Trustees covering the Scheme year to 30 September 2025. The purpose of this Statement is to:

- detail any reviews of the Statement of Investment Principles (‘SIP’), required under section 35 of the Pensions Act 1995, that the Trustees have undertaken, and any changes made to the SIP over the year as a result of the review;
- set out the extent to which, in the opinion of the Trustees, the Scheme’s SIP has been followed during the year;
- describe the voting behaviour by, or on behalf of, the Trustees over the year (including the most significant votes cast by the Trustees or on their behalf); and
- set out the extent to which, in the opinion of the Trustees, the engagement policy within the SIP has been followed during the year.

The latest version of the SIP can be found online here:

<https://ifpensionscheme.com/wp-content/uploads/2020/09/Irish-Ferries-UK-Limited-Pension-Scheme-SIP-September-2020.pdf>

#### 2 Review of and changes to the SIP

##### *Review of the SIP and changes made during the Scheme year*

2.1 The SIP was reviewed by the Trustees at their meeting in March 2024 in light of the changes made to the investment strategy in May 2023. The Trustees concluded that no changes were required to the SIP. However, the Investment Portfolio Document (IPD) was updated to reflect the current investment benchmark.

##### *Subsequent review of and changes to SIP (post Scheme year-end)*

2.2 There were no further changes to the SIP post year-end.

#### 3 Adherence to the SIP

3.1 The Trustees believe the policies set out in the SIP have been followed during the 2024/25 Scheme year and the justification for this is set out in the remainder of this section.

##### *Overall investment objective as set out in the SIP*

3.2 The Trustees’ investment objectives are described in the SIP.

##### *How do the Trustees meet their investment obligations?*

3.3 The Trustees meet these objectives by regularly reviewing the investment strategy - the most recent review was carried out in March 2023 when the Trustees updated their strategic asset allocation to reduce the allocation to growth assets from 50% to 33% and disinvested from the

Diversified Fund. The Trustees also reviewed the structure of their bond assets in order to provide a better hedge against the movements in liability value due to interest rate and inflation changes. Following the December 2025 Trustee meeting, the Trustee decided to further reduce their allocation to Global Equities from 33% to 30% pending a review of the investment strategy.

**Professional advice**

- 3.4 The Trustees are aware of the requirement to take professional advice when setting and reviewing investment strategy. The Trustees use WTW on an ad-hoc basis to provide such advice.
- 3.5 The Trustees have established Investment advisor objectives and monitor these on a regular basis.

**Investment strategy**

- 3.6 The Trustees recognise that the Scheme’s investment strategy is of primary importance in seeking to achieve their investment objectives.
- 3.7 The table below sets out the strategic asset allocation benchmark:

Asset class	Benchmark (%)
Global Equities	30.0%
Government Bonds	70.0%

**Investment manager arrangements**

- 3.8 There were no changes to the investment managers employed to manage the Scheme’s asset during the year.
- 3.9 The Scheme’s portfolio is comprised of global equities and UK government bonds. All the Scheme assets are managed passively by Legal and General Investment Management (LGIM).
- 3.10 The asset allocation and the investment vehicles through which it is implemented ensures the portfolio has a suitable mix of return-seeking and matching assets, consistent with the Trustees’ policy.

**Risk management**

- 3.11 The Trustees have identified several risks involved in the management of the Scheme assets which are considered when reviewing the investment arrangements. These risks and the process through which they are managed are laid out in the Scheme’ Risk Register. The Trustees continued to review and monitor these risks in line with their SIP over the year.

**4 ESG considerations**

- 4.1 Considering the Scheme’s investment funds are passively managed, the Trustees take a pragmatic approach to ESG considerations. This is reflected in the SIP.
- 4.2 The Trustees have delegated responsibility for the selection, retention and realisation of investments to the underlying investment managers. The Trustees recognise that long-term sustainability issues, including climate change, may have an impact on investment risk and outcomes. At the present time the strategy is to invest predominantly in passive funds which do not take explicit account of social, environmental and governance considerations in the selection, retention and realisation of investments. However, the Trustees do review the strategy on an

ongoing basis and may reflect these factors in subsequent changes to the strategy or to underlying investment managers.

- 4.3 The Trustees continue to develop their approach to ESG monitoring and will continually review LGIM's Sustainable investment reports annually.

**5 Voting and engagement**

- 5.1 All the Scheme's investments are held within pooled funds. The key area of activity during the Scheme year was to consider how to monitor (and measure) LGIM's performance in these areas.
- 5.2 Due to the passive nature of the Scheme's investments, the Trustees recognise that no material decisions are taken by the investment manager on the holdings to be included in the portfolio. However, the Trustees expect that the extent to which social, environmental, governance or ethical issues may have a fundamental impact on the portfolio will be taken into account by the investment manager in the exercise of their delegated duties. The Trustees expect LGIM to actively engage with the Companies of which it holds shares in the funds on their behalf. This is because the pooled nature of the invested funds and the Scheme's relatively small size and limited resources mean the Trustees cannot directly engage with these Companies themselves in a proportionate way.
- 5.3 The Trustees have delegated all voting and engagement activities to the underlying manager but nevertheless expect effective activities in these areas to form part of their processes. The Trustees, with the help of their investment advisor, will continue to review LGIM's Stewardship policies (made available at the following link [https://am.landg.com/asset/496002/globalassets/lgim/\\_document-library/capabilities/lgim-global-corporate-governance-and-responsible-investment-principles.pdf](https://am.landg.com/asset/496002/globalassets/lgim/_document-library/capabilities/lgim-global-corporate-governance-and-responsible-investment-principles.pdf)).

**Voting**

- 5.3 The following table sets out a summary of the voting statistics for the Scheme's LGIM funds for the year ending 30 September 2025:

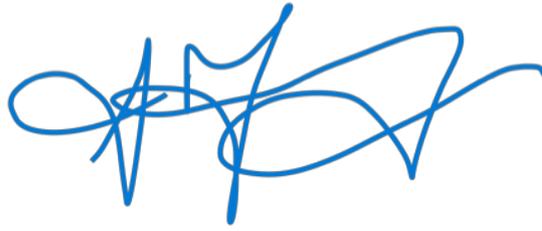
<b>Manager and strategy</b>	<b>Voting activity</b>
<b>LGIM World Equity Index Fund</b>	<ul style="list-style-type: none"> <li>• Number of meetings at which the manager was eligible to vote: 6,602</li> <li>• Number of resolutions on which manager was eligible to vote: 64,855</li> <li>• Percentage of resolutions on which the manager voted (out of those resolutions where the manager was eligible to vote): 99.93%</li> <li>• Percentage of votes with management: 79.23%</li> <li>• Percentage of votes against management: 18.98%</li> <li>• Percentage of votes abstained from: 1.78%</li> <li>• Of the meetings the manager was eligible to attend, the percentage where the manager voted at least once against management: 58.33%</li> <li>• Of the resolutions where the manager voted, the percentage where the manager voted contrary to the recommendation of the proxy advisor: 9.89%</li> </ul>

## Engagement

- 5.4 The Trustees have relied on the investment manager's criteria on determining the most significant votes for each Fund and has then decided on a selection of those to disclose in the implementation statement based on criteria they set.
- 5.5 The table below demonstrates some of the more significant votes cast on behalf of the Scheme over the year to 30 September 2025:

Manager	Significant votes cast
LGIM	<p><b><u>Microsoft Corporation</u></b></p> <p><b><u>Meeting date: 10 December 2024</u></b></p> <p><b>Shareholder resolution:</b> Report on AI Data Sourcing Accountability</p> <p><b>How the manager voted:</b> For</p> <p><b>Outcome:</b> Fail</p> <p><b>More details:</b> LGIM reasoned that a vote FOR this resolution was warranted as the company is facing increased legal and reputational risks related to copyright infringement associated with its data sourcing practices. While the company has strong disclosures on its approach to responsible AI and related risks, shareholders would benefit from greater attention to risks related to how the company uses third-party information to train its large language models</p>
LGIM	<p><b><u>Mastercard Incorporated</u></b></p> <p><b><u>Meeting date: 24 June 2025</u></b></p> <p><b>Shareholder resolution:</b> Oversee and Report on a Racial Equity Audit</p> <p><b>How the manager voted:</b> For</p> <p><b>Outcome:</b> Fail</p> <p><b>More details:</b> LGIM voted in favour of this Shareholder Resolution as they support such information and risk management approach to Diversity.</p>
LGIM	<p><b><u>Shell Plc</u></b></p> <p><b><u>Meeting date: 20 May 2025</u></b></p> <p><b>Shareholder resolution:</b> Request Company Disclose Whether and How Its: Demand Forecast For LNG; LNG Production And Sales Targets; And New Capital Expenditure In Natural Gas Assets; Are Consistent With Climate Commitments, Including Target To Reach Net Zero Emissions By 2025</p> <p><b>How the manager voted:</b> Against</p> <p><b>Outcome:</b> Fail</p> <p><b>More details:</b> Whilst LGIM recognised the intent behind this resolution, they decided to vote against it following careful consideration. This decision follows a series of constructive engagements with Shell's leadership, during which the company committed to improving disclosures on stranded asset risks and financial resilience related to its LNG operations. LGIM acknowledged meaningful progress in Shell's reporting, which now provides a clearer basis for assessing climate-related risks. In light of these developments, LGIM believe the resolution's key objectives are being addressed through ongoing company actions.</p>

Signed:

A handwritten signature in blue ink, appearing to be 'Ed Murray', written in a cursive style.

Name: Ed Murray

Title: Trustee Chair

Authorised for and on behalf of the Trustees of the Scheme