Civil Service Benevolent Fund Pension and Assurance Scheme (the “Scheme”)

Engagement Policy Implementation Statement

Financial Year Ending 5 April 2026

Introduction

This statement sets out how, and the extent to which, the Scheme’s Engagement Policy in the Statement of Investment Principles (‘SIP’) produced by the Trustees has been followed during the year to 5 April 2026 (the “Scheme Year”). 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, the subsequent amendment in The Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019 and the statutory guidance on reporting on stewardship in the implementation statement dated 17 June 2022.

The statement is based on, and should be read in conjunction with, the SIP dated July 2025.

A copy of the SIP containing the Engagement Policy is available at Statement of Investment Principles – July 2025

The Trustees are satisfied that all policies in the SIP on voting and engagement have been followed during the Scheme Year.

Statement of Investment Principles

The Trustees believe it is important to consider the policies in place in the context of the investment objectives they have set. As set out in the SIP, the Trustees’ primary investment objective for the Scheme is to achieve an overall rate of return that is sufficient to ensure that assets are available to meet all liabilities as and when they fall due.

In doing so, the Trustees also aim to maximise returns at an acceptable level of risk taking into consideration the circumstances of the Scheme. The Trustees also ensure that their investment objectives and the resultant investment strategy are consistent with the actuarial valuation methodology and assumptions used in the Statutory Funding Objective.

In June 2025, the Trustees reviewed the Scheme’s SIP to reflect changes to the investment strategy. Following an investment strategy review in Q4 2024, it was agreed that the Diversified Growth Fund allocation would be reduced, and a new allocation would be made to investment grade corporate bonds.

Environmental, Social and Governance ("ESG")

The Trustees understand that they must aim to consider all factors that can impact the financial performance of the Scheme's investments over the appropriate time horizon. This includes, but is not limited to, environmental, social and governance ("ESG") factors.

The Scheme's SIP includes the Trustees' policy on ESG factors, Stewardship and Climate Change. This policy sets out the Trustees' beliefs on ESG and climate change and the processes followed by the Trustees in relation to voting rights and stewardship. The Trustees keep their policies under regular review with the SIP subject to review at least triennially.

Set out below is a summary of the work that was undertaken during the year relating to the Trustees' policy on ESG factors, stewardship and climate change, as well as an overview of how the Trustees' engagement and voting policies were followed and implemented during the year.

Engagement Activity by the Scheme's Investment Managers

Over the Scheme Year, the Trustees have not engaged with the underlying pooled fund managers on matters pertaining to ESG, stewardship or climate change. However, the Trustees use Mercer's ESG considerations to assess how ESG, climate change and stewardship are integrated within the investment process as part of their monitoring of existing investment managers.

The Scheme's investment performance report was reviewed by the Trustees on a semi-annual basis – this includes manager research ratings (both general and ESG specific) from Mercer, as well as detail on how investment managers are delivering against their specific mandate.

The Trustees are satisfied that the ESG considerations are satisfactory in the context of the mandates of the funds.

Further information on the investment managers' approaches to responsible investment, voting and engagement with the investee companies is available at the following websites:

Columbia Threadneedle:	https://www.columbiathreadneedle.com/en/gb/institutional/about-us/responsible-investment/
L&G:	https://am.landg.com/en-uk/institutional/responsible-investing/investment-stewardship/
Payden & Rygel:	https://www.payden.com/ESG.aspx

All the Scheme's investment managers are signatories of the UK Stewardship Code 2020 as follows:

Manager	Signatory Since
Columbia Threadneedle	2022
Payden & Rygel	2021
L&G	2021

Source: FRC website

Taking all the above into consideration, the Trustees are satisfied that Responsible Investment is central to the investment managers' approaches to investing.

Voting and Engagement Disclosures

The Scheme is invested in multi-client pooled funds therefore the Trustees do not have direct voting rights in relation to the Scheme's investments. The Trustees have effectively delegated their voting rights to their investment managers. The Trustees have not been asked to vote on any specific matters over the Scheme year covered by this statement. Nevertheless, this statement sets out a summary of the key voting activity carried out on behalf of the Trustees by the investment managers of the multi-client pooled funds for which voting is possible (i.e., all funds which include equity holdings). The Trustees do not use the direct services of a proxy voter.

Manager / Fund	Proxy voter used?	# of meetings where the investment manager was eligible to vote	# of resolutions the investment manager eligible to vote on	% of eligible resolutions voted on	Of the resolutions the investment manager voted on		
					% of votes which were with management	% of votes which were against management	% of votes which were abstained
Columbia Threadneedle Multi Asset Fund	**ISS -** cognisant of proxy advisers' voting recommendations **Glass Lewis -** For research	503	6,638	99.8%	93.6%	5.7%	0.7%
L&G Future World Global Equity Index Fund & GBP Hedged	L&G's Investment Stewardship team uses ISS's 'Proxy Exchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by L&G and they do not outsource any part of the strategic decisions. To ensure the proxy provider votes in accordance with L&G's view on ESG, they have put in place a custom voting policy with specific voting instructions.	5,886	60,906	100.0%	79.0%	20.0%	1.0%

Notes: ISS = Institutional Shareholder Services Inc.

NIS = Nordic Investor Services

The Trustees have classified "most significant votes" as any vote which concerns Climate Change e.g. a vote on a company's carbon disclosures or low-carbon transition, where the Size of the holding is >0.5% of the fund. Where applicable, examples of such significant votes are summarised in the table below:

Manager	Company	Date	Criteria for assessing as significant	Size of holding (% of Fund)	Summary of resolution	Vote cast	Rationale for voting decision	Outcome	Next steps
Columbia Threadneedle – Multi Asset Fund	Amazon.com, Inc.	21/05/2025	Vote relating to climate change	1.1%	Disclose All Material Scope 3 Emissions	Against (with management) Intent not communicated to the company ahead of the vote	Columbia Threadneedle (CT) only provides voting rationale for votes against management.	Fail	Active stewardship (engagement and voting) continues to form an integral part of CT's research and investment process.
	Amazon.com, Inc.	21/05/2025	Vote relating to climate change	1.1%	Report on Impact of Data Centres on Climate Commitments	Against (with management) Intent not communicated to the company ahead of the vote	Columbia Threadneedle (CT) only provides voting rationale for votes against management.	Fail	Active stewardship (engagement and voting) continues to form an integral part of CT's research and investment process.
	Amazon.com, Inc.	21/05/2025	Vote relating to climate change	1.1%	Report on Efforts to Reduce Plastic Packaging	Against (with management) Intent not communicated to the company ahead of the vote	Columbia Threadneedle (CT) only provides voting rationale for votes against management.	Fail	Active stewardship (engagement and voting) continues to form an integral part of CT's research and investment process.
	Meta Platforms, Inc.	28/05/2025	Vote relating to climate change	0.6%	Disclose a Climate Transition Plan Resulting in New Renewable Energy Capacity	Against (with management) Intent not communicated to the company ahead of the vote	Columbia Threadneedle (CT) only provides voting rationale for votes against management.	Fail	Active stewardship (engagement and voting) continues to form an integral part of CT's research and investment process.

Sources: Investment managers. Voting information as at 31 March 2026.

There were no votes qualifying under the Trustees' definition of 'most significant' related to the L&G Future World Global Equity Index Fund & GBP Hedged holdings of the Scheme.