

Annual Implementation Statement (the “Statement”) – Year Ending 31 December 2024

The Professional Golfers’ Association Scheme 2001 Retirement and Death Benefits Scheme – F48177

Introduction

This Statement, written for the benefit of the members of The Professional Golfers’ Association Scheme 2001 Retirement and Death Benefits Scheme (the “Scheme”) sets out how, and the extent to which, the Statement of Investment Principles (“SIP”) produced by the Trustees has been followed over the 12 months to 31 December 2024. The Scheme is a defined contribution pension plan, which will provide members with a money purchase benefit. This Statement has been produced in accordance with The Occupational Pension Schemes (Investment and Disclosure) (Amendment) 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 SIP is a document drafted by the Trustees in order to help govern the Scheme’s investment strategy. It details a range of investment-related policies, a summary of which is included in the table below, alongside the relevant actions taken by the Trustees in connection with each of these policies.

As required by the legislation, the Trustees have consulted a suitably qualified person and have obtained written advice from its investment consultant, Mercer Limited (“Mercer”). The Trustees believe the investment consultant meets the requirement of Section 35 (5) of the Pensions Act 1995. In preparing this Statement, the Trustees have also consulted the sponsoring Company.

The statement is based on, and should be read in conjunction with, the relevant version of the SIP that were in place for the Scheme Year, which are the SIP versions signed on 1 December 2023.

A copy of the SIP is available at: [f48177-statement-of-investment-principles-2024.pdf](https://www.f48177.co.uk/f48177-statement-of-investment-principles-2024.pdf).

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

Investment Objectives of the Scheme

The Trustees believe it is important to consider the policies in place in the context of the investment objectives they have set. The objectives of the Scheme, included in the SIP, are as follows:

- To provide a default investment option for members until they make their own investment decisions.
- To make available a range of investment funds that is expected to enable members to select an investment strategy that meets their own individual needs and preferences.
- Offer access to lifestyle strategies, which facilitate diversification and are expected to achieve long-term capital growth.
- Offer funds and lifestyle strategies that enable members to reduce investment risk in the run-up to retirement.
- Offer funds which mitigate the impact of sudden and sustained reductions in capital values or rises in the cost of providing benefits at retirement (cash, annuity purchase or drawdown).

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

Review of the SIP

The Trustees formally reviewed the SIP during the year and updates to the SIP have been made after the Scheme year end to reflect the outcomes of the triennial review. The relevant SIP for this statement was signed on 1 December 2023.

Investment Strategy Review

The default investment option is reviewed at least triennially and a review was undertaken during the Scheme Year in December 2024.

This review addressed strategic asset allocation, suitability of the benefit targeted by default, growth and de-risking phases of the glidepaths, consideration of ESG integration and climate metrics, illiquid assets considerations and the self-select fund range options. The one change proposed from this review is still being considered by the Trustees during 2025.

The next triennial review will take place in December 2027.

Assessment of how the policies in the SIP have been followed for the year to 31 December 2024

The information provided in this section highlights the work undertaken by the Trustees during the year, and longer-term where relevant, and sets out how this work followed the Trustees' policies in the SIP, relating to the Scheme as a whole and the default investment option. The SIP is attached as Appendix A and sets out the policies referenced below.

In summary, it is the Trustees' view that the policies in the SIP have been followed during the Scheme year.

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

	Requirement	Policy	In the year to 31 December 2024
1	Securing compliance with the legal requirements about choosing investments	<p>(1) Introduction</p> <p><i>Before preparing this Statement of Investment Principles, the Trustees have consulted with the Employer, (The Professional Golfers' Association), and obtained and considered written professional advice from Mercer Limited, the Scheme's investment consultants, regarding the investment arrangements to ensure compliance with the legal requirements about choosing investments (as per section 36 of the Pensions Act 1995).</i></p>	<p>The triennial strategy review was undertaken during this scheme year in December 2024. No changes were made from the outcome of the review.</p> <p>This review addressed strategic asset allocation, suitability of the benefit targeted by default, growth and de-risking phases of the glidepaths, consideration of ESG integration and climate metrics, illiquid assets considerations and self-select fund range options.</p> <p>The next triennial review will take place in December 2027.</p>
2	Kinds of investments to be held	<p>(4.2) Default Investment Option</p> <p><i>The default option aims to generate investment returns, in a risk-controlled manner, and has been designed for members who are expected to take their savings as a tax free cash lump sum at retirement.</i></p>	

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

	Requirement	Policy	In the year to 31 December 2024
		<i>Lifestyle strategies are designed to meet the conflicting objectives of maximising the value of the member's assets at retirement and protecting the member's accumulated assets in the years approaching retirement.</i>	
3	The balance between different kinds of investments	<p>(4.1) Range of Funds</p> <p><i>The Trustees believe, having taken expert advice, that it is appropriate to offer a range of investment funds and lifestyle strategies to allow members to tailor their own investment strategy.</i></p> <p><i>The Trustees have considered both actively and passively managed fund options in the design of the investment strategy.</i></p> <p><i>The Trustees also recognise that members may not believe themselves qualified to make investment decisions. As such, the Trustees make available a default investment option.</i></p>	<p>The Trustees reviewed the fund range as part of quarterly meetings and the annual Value for Members' assessment. For this Scheme Year, this was also considered as part of the triennial investment strategy review presented in December 2024.</p> <p>The Trustees review the performance of the Plan's fund range through quarterly performance reports from Aviva during each Trustees' meeting.</p> <p>No changes were made to the range of funds that members could invest in during the year.</p>

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

	Requirement	Policy	In the year to 31 December 2024
4	Risks, including the ways in which risks are to be measured and managed	<p>(3.2) Policies with Regards to Risk and Return</p> <p><i>In determining the investment arrangements, risk is not considered in isolation, but in conjunction with expected investment returns and outcomes for members. The Trustees have considered return expectations and risk from a number of perspectives.</i></p>	<p>As detailed on Section 3.2 of the SIP, the Trustees have considered return expectations and risk from a number of perspectives as part of the triennial review in December 2024. The list provided in this section of the SIP is not exhaustive but covers the main risks that the Trustees consider and how these are managed and measured.</p> <p>Throughout the year, the Trustees raised questions regarding the investment strategy during their meetings. They took these risks into account when establishing and reviewing the investment strategy, as well as through quarterly monitoring of the investment funds via performance reports.</p>
5	Expected return on investments	<p>(4.2) Default Investment Option</p> <p><i>The default investment option manages investment risks through a diversified strategic asset allocation consisting of mainstream asset classes. Risk is not considered in isolation, but in conjunction with expected investment returns and outcomes for members. In selecting the default investment option, the Trustees have explicitly considered the trade-off</i></p>	<p>The objectives of the default investment option, and the ways in which the Trustees seek to achieve these objectives, are detailed in Section 4.2 of the SIP.</p> <p>The Trustees have reviewed the asset allocation of the Aviva funds that are part of the default investment option during the year; using the Aviva factsheets and My Future range quarterly report, which includes risk and return metrics.</p> <p>The outcome of the triennial investment review confirmed that the investment risks are managed in line with principles set out and are expected to provide strong long terms returns to deliver good outcomes</p>

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

	Requirement	Policy	In the year to 31 December 2024
		<i>between risk and expected returns.</i>	
6	Realisation of investments	<p>(8) Realisation of assets</p> <p><i>The Investment Managers have responsibility for the realisation and trading of the underlying assets. The day-to-day activities which the Investment Managers carry out for the Trustees are governed by the arrangements between the Investment Managers and the Provider.</i></p>	<p>Members' investments and the funds available are traded and priced on a daily basis. The platform provider for the investment fund options is Aviva. The Trustees have taken steps to satisfy themselves that Aviva and underlying fund managers have the appropriate knowledge and experience for managing the Scheme's investments and they are carrying out their work competently.</p> <p>As the assets of the Scheme are invested in pooled fund vehicles, the investment restrictions applying to these funds are controlled by the underlying managers of the funds - which is Aviva for the default.</p> <p>No known issues relating to the liquidity of the Scheme's investment arose during the Scheme Year.</p>
7	Financially material considerations over the appropriate time horizon of the investments, including how those considerations are taken into account in the	<p>(6) Socially Responsible Investment</p> <p><i>The Trustees believe that environmental, social, and corporate governance (ESG) factors may have a material impact on investment risk and return outcomes, and that good stewardship can create and preserve value for companies and markets as a whole - which</i></p>	<p>The Trustees reviewed the investment options within the Value for Members' assessment on an annual basis and as part of the triennial investment strategy review during the Scheme Year - both included a review of ratings on funds (both Mercer and specific ESG) from the investment advisers.</p> <p>The changes made by Aviva within the My Future Growth, Drawdown and Consolidation Funds in relation to the greater integration of ESG-focused investments and how this has helped reduce the carbon intensity was</p>

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

	Requirement	Policy	In the year to 31 December 2024
	selection, retention and realisation of investments	<p><i>in turn may have a positive impact on member outcomes.</i></p> <p><i>As the assets of the Scheme are invested in pooled funds, the Trustees have given appointed investment managers full discretion in evaluating ESG factors, including climate change considerations, and exercising voting rights and stewardship obligations attached to the investments.</i></p>	<p>discussed were acknowledged by the Trustees during meetings.</p> <p>Voting activity and stewardship are reviewed annually as part of the preparation of this statement. Details of the significant votes, relating to the stewardship priorities of the Trustees as documented, are included in this statement.</p>
8	The extent (if at all) to which non-financial matters are taken into account in the selection, retention and realisation of investments	<p><i>The Trustees do not explicitly take the views of individual members and beneficiaries of the Scheme into account in relation to ethical considerations, social and environmental impact, or present and future quality of life matters (wording not specifically in the SIP but taken into account when making decisions around investments).</i></p>	<p>Member views are not explicitly taken into account in the selection, retention and realisation of investments. No action was taken in this respect during the Scheme Year to 31 December 2024.</p>
9	The exercise of the rights (including voting rights)	<p>(7) Corporate Governance, Voting and Activism</p>	<p>The Trustees have given the appointed investment managers, underlying the Aviva funds, full discretion in evaluating ESG factors, including climate change</p>

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

	Requirement	Policy	In the year to 31 December 2024
	attaching to the investments and undertaking engagement activities in respect of the investments (including the methods by which, and the circumstances under which, trustees would monitor and engage with relevant persons about relevant matters)	<p><i>The Trustees believe that good corporate governance is important and they expect their investment managers to have developed a policy which promotes the concept of good corporate governance and, in particular, a policy of exercising voting rights.</i></p> <p><i>As the assets of the Scheme are invested in wholly insured arrangement with investments in pooled vehicles the Trustees accept that the assets are subject to the investment fund managers' own policies on corporate governance, voting and activism.</i></p> <p><i>The Trustees are able to encourage them to exercise those rights on behalf of members' interests when they believe there could be a potential financial impact on the funds, in accordance with their own corporate governance policies and current best practice, including the UK</i></p>	<p>considerations, exercising voting rights and stewardship obligations attached to the investments.</p> <p>Investment managers are expected to provide voting summary reporting on a regular basis (at least annually) and have done so.</p> <p>The following funds contain an allocation to equities:</p> <ul style="list-style-type: none"> - Aviva BlackRock Aquila (50:50) Global Equity Index (Aquila C) - Aviva BlackRock Aquila UK Equity Index (Aquila C) - Aviva Managed Fund - Aviva Stewardship Managed Fund - Equity components of My Future - for this Scheme this is relevant for My Future Growth, My Future Consolidation and My Future Drawdown as an alternative retirement option: <ul style="list-style-type: none"> • AI European Equity Index • AI US Equity Index • AI Pacific Rim Equity Index • AI Japanese Equity Index - Equity components of With Profits Funds: <ul style="list-style-type: none"> • Schroder Global Equity Alpha Fund • Schroder Strategic Global Equity Fund • Schroder UK Equity ex Tobacco Fund • SISF - Global Climate Change Equity Fund • UKLAP WP FPLP Asset Share Walter Scott (FPWW)

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

	Requirement	Policy	In the year to 31 December 2024
		<i>Corporate Governance Code and UK Stewardship Code.</i>	<p>The voting records of the investment managers are summarised in Appendix B.</p> <p>No direct action was needed or taken in relation to challenging managers during the year.</p>
10	How the arrangement with the asset manager incentivises the asset manager to align its investment strategy and decisions with the trustees policies	<p>(9.1) Aligning Manager Appointments with Investment Strategy</p> <p><i>Investment managers are appointed based on their capabilities and, therefore, their perceived likelihood of achieving the expected return and risk characteristics required for the asset class being selected. These characteristics will differ for each asset class so appointing a single manager may not be the most appropriate approach.</i></p> <p><i>The Trustees will seek guidance from the Investment Consultant, where appropriate, for their forward looking assessment of a manager's ability to perform over a full market cycle. The Investment Consultant's manager research</i></p>	<p>Investment managers and ESG ratings were provided by Mercer and included in the Value for Members' assessment for the Scheme Year. This enabled the Trustees to assess Aviva's capabilities in this area.</p> <p>No changes were made to the fund options following the review of this assessment. No new underlying investment managers were appointed during the year.</p>

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

	Requirement	Policy	In the year to 31 December 2024
		<p><i>ratings assist with due diligence and are used in decisions around selection, and retention of manager appointments.</i></p> <p><i>The Trustees will review an appointment if the investment objective for a manager's fund changes to ensure it remains appropriate and consistent with the Trustees' wider investment objectives.</i></p>	
11	How the method (and time horizon) of the evaluation of the asset manager's performance and the remuneration for asset management services are in line with the trustees' policies	<p>(9.2) Evaluating Investment Manager Performance</p> <p><i>The Trustees receive investment manager performance at least annually using information provided by Aviva. The Trustees review the absolute performance and relative performance against a suitable index or benchmark.</i></p>	<p>Factsheets and quarterly reports for the My Future fund range were received from Aviva during the year, which were reviewed by the Trustees and discussed at quarterly meetings.</p> <p>In addition, longer-term performance was reviewed as part of the annual Value for Members' assessment and the triennial investment strategy review.</p> <p>Following the conclusion of the previous Value for Members' assessment, Mercer discussed a potential reduction of the scheme charges within the existing Trust arrangement from 0.65% to 0.49%. This reduction was implemented after the Scheme Year end.</p>

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

	Requirement	Policy	In the year to 31 December 2024
12	How the trustees monitor portfolio turnover costs incurred by the asset manager, and how they define and monitor targeted portfolio turnover or turnover range	<p>(9.3) Portfolio Turnover Costs and Manager Turnover</p> <p><i>The Trustees monitor portfolio turnover costs, which are incorporated in the annual costs and charges, on an annual basis as part of its annual value for members' assessment.</i></p> <p><i>The Trustees are long-term investors and are not looking to change the investment arrangements on a frequent basis.</i></p>	<p>Transaction costs are disclosed in the annual Chair's Statement and Value for Members' assessment. Data has been obtained from Aviva.</p> <p>While the transaction costs provided appear to be reflective of costs expected of the various asset classes and markets that the Scheme invests in, there is not yet any "industry standard" or universe to compare these to.</p>
13	The duration of the arrangement with the asset manager	<p>(9.3) <i>The Trustees are long-term investors and are not looking to change the investment arrangements on a frequent basis and so will therefore retain an investment manager unless:</i></p> <p><i>1) There is a strategic change to the overall strategy that no longer requires exposure to that asset class or manager;</i></p>	<p>There were no changes in investment managers during the year.</p>

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

	Requirement	Policy	In the year to 31 December 2024
		<i>2) The basis on which the manager was appointed changes materially (e.g. manager fees or investment process);</i> <i>3) The manager appointed has been reviewed and a decision is taken to terminate the mandate.</i>	

Appendix A – Statement of Investment Principles

Appendix B – Examples of Engagement Activity by the Scheme's Equity Investment Managers

BlackRock engages on Shell's energy transition update and energy transition strategy

At Shell's request, BlackRock engaged with members of the company's board and management team in April 2024 to gain a deeper understanding of Shell's approach to managing climate-related risks and opportunities. This engagement included discussions on how the company sets and updates its climate-related targets, along with other topics relevant to long-term financial value creation.

BlackRock supported Shell's management proposal, as the company provided a comprehensive assessment of its plans to address material climate-related risks and opportunities, while also demonstrating tangible progress against its Energy Transition Strategy.

Conversely, BlackRock did not support the shareholder proposal, viewing it as overly prescriptive. It is the responsibility of company leadership to establish and implement the company's strategy. Supporting this proposal would have contradicted the Energy Transition Strategy 2024 presented by the board and management team.

Aviva engages on Lonza climate strategy

Aviva Investors engaged with Lonza to discuss the company's climate transition strategy, emphasizing various critical aspects such as disclosures, targets, climate-related risk assessment and management, decarbonization of operations and the value chain, facility and energy management, research and development, product manufacturing processes, and circularity in operations.

Subsequent to this engagement, Lonza has made significant advancements. The company has implemented a site-related physical risk assessment utilizing a credible database to evaluate localized climate risks, which encompasses over 80% of its sales. This approach enables Lonza to gain a more nuanced understanding of its risk mitigation strategies. Furthermore, Lonza, in collaboration with five other major pharmaceutical companies, has entered into a substantial agreement with Envision Energy to secure access to renewable power in China. This

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

initiative is expected to provide 200 GWh of renewable electricity annually, resulting in an estimated reduction of 120,000 tonnes of CO2 emissions. Additionally, Lonza is placing increased emphasis on enhancing the use-life of solvents in its production processes and is actively pursuing innovative methods to repurpose end-of-life equipment, as demonstrated by a case study involving the use of old equipment to produce PVC flooring in the United States.

Appendix C – Voting Activity and Engagement during the Scheme year

The Trustees have delegated their voting rights to the investment manager. The SIP states *"The Trustees have given appointed investment managers, underlying the Aviva funds, full discretion in evaluating ESG factors, including climate change considerations, exercising voting rights and stewardship obligations attached to the investments. The Trustees are able to encourage them to exercise those rights on behalf of members' interests when they believe there could be a potential financial impact on the funds, in accordance with their own corporate governance policies and current best practice, including the UK Corporate Governance Code and UK Stewardship Code"*.

The Trustees have previously considered what the Scheme's stewardship priorities should be as a result of requirements introduced in 2022 for the SIP Implementation Statement in relation to 'significant votes'. The Trustees have established that the following ESG factors should have the most focus:

- Environmental: Climate change with a focus on low carbon transition and physical damages resilience.
- Environmental: Pollution & natural resource degradation with a focus on air, water, land (forests, soils and biodiversity)
- Governance: Diversity, equity and inclusion in terms of governance and decision making.

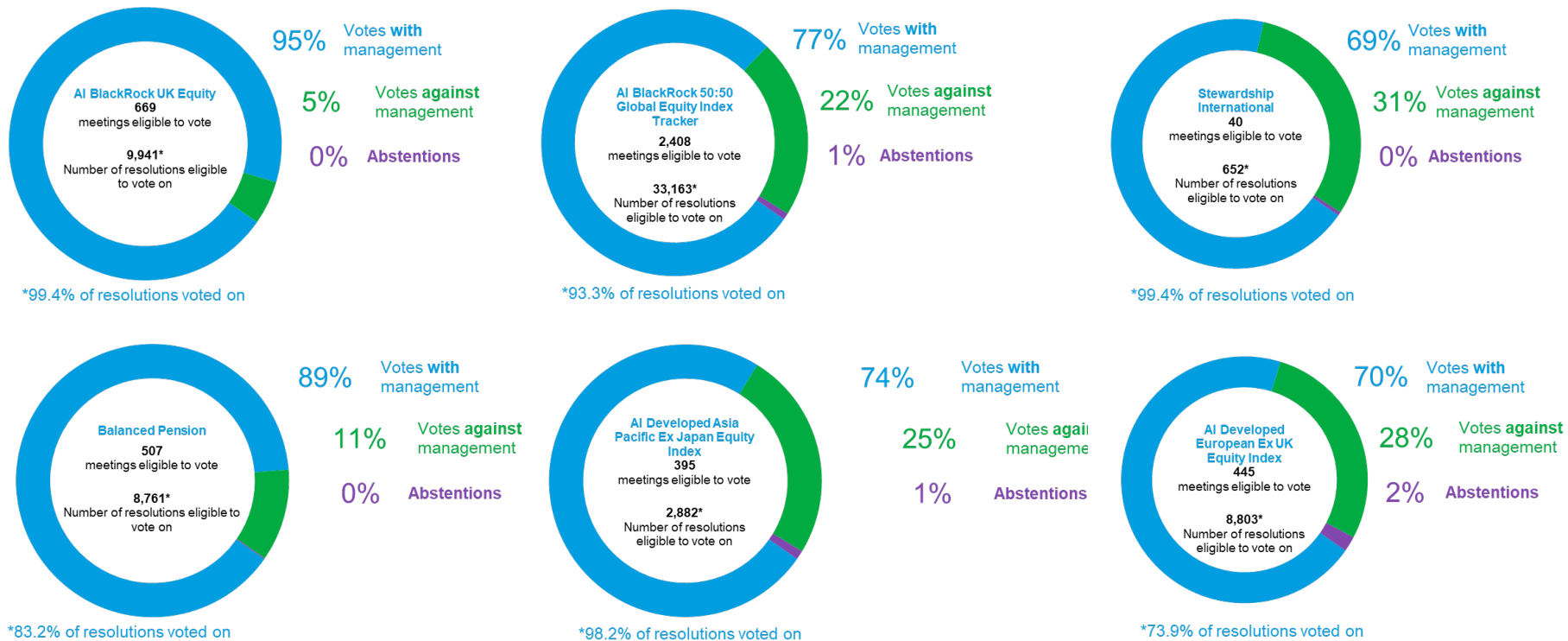
These areas have been selected by the Trustees as they believe them to be the financially material in terms of both risk and opportunity and/or carry most reputational risk and, as a result, areas of focus that are in members' best interests. Although, the Trustees have not made the investment managers' aware their stewardship priorities, they note that these priorities are broadly aligned with the areas the Scheme's investment managers are currently focusing on in terms of voting and engagement.

Overview of voting activity, on behalf of the Trustees, for the funds containing equity.

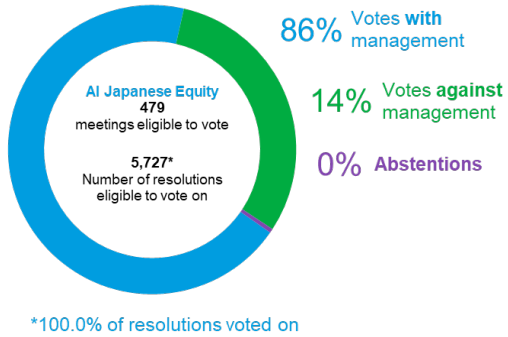
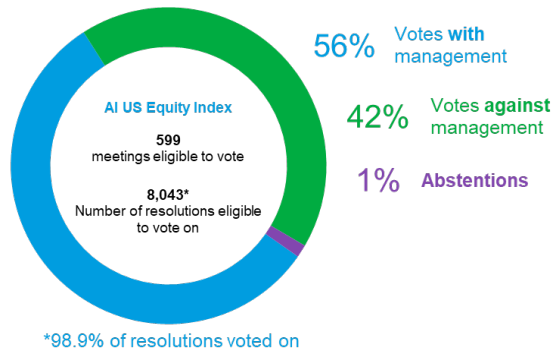
The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

Set out below is a summary of voting activity for this reporting period relating to the relevant strategies of the Scheme. Voting activity has been requested from all managers but at the time of writing this report, not all managers have responded. We will continue to chase the managers to receive this information. Votes "for / against management" assess how active managers are in voting for and against management. **Purple** represents abstention

Aviva has provided the voting disclosures relating to the funds containing equity. The data relates to the period 1 January 2024 to 31 December 2024.

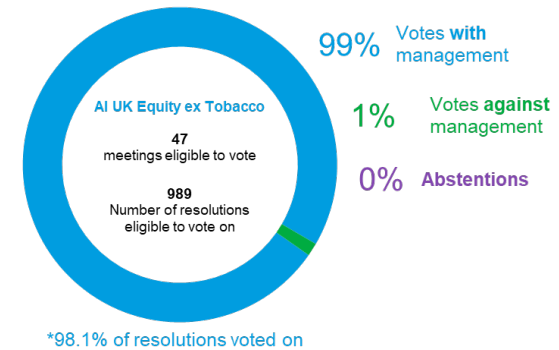
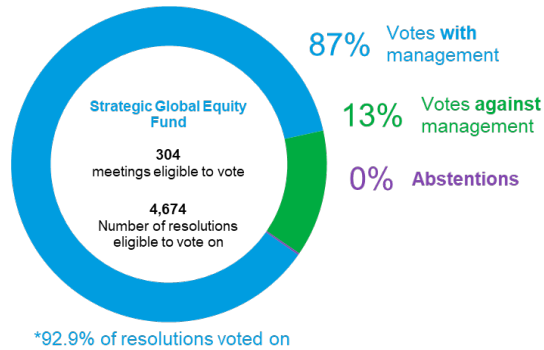
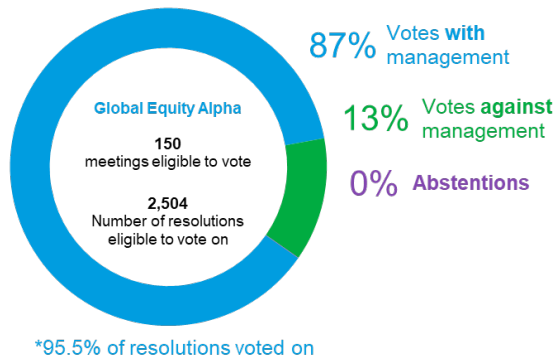


The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

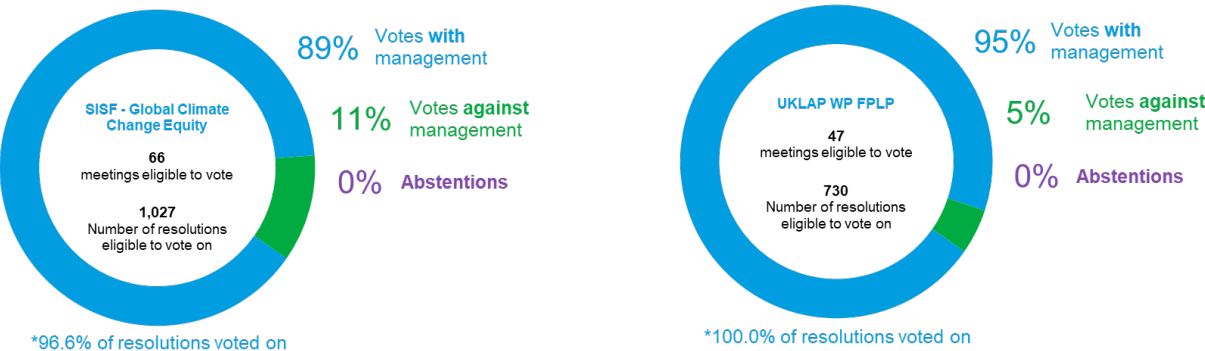


Source: Aviva, investment managers as at 31 December 2024. Figures may not sum to 100% due to rounding.

The below funds contain equity holdings in the With Profits Fund



The Professional Golfers’ Association Scheme 2001 Retirement and Death Benefits Scheme



Source: Aviva, investment managers as at 31 December 2024. Figures may not sum to 100% due to rounding.



Sample of significant votes

Managers have provided examples of significant votes across the funds previously noted as containing equity. It is not possible to disclose all the information received in this statement. Therefore, significant votes for each manager were included focusing on the priority areas for the Trustees with a threshold of above 1% approximate size of holding at date of vote. The final outcome column below represents the result of the Resolution after all the votings: Passed (✓) or Not-Passed (✗).

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

Fund	Company	Approx. Size of Holding at date of vote	Date	How the manager voted	Summary of the Resolution	Priority Area for significance	Rationale for the Manager vote	Final outcome	Next Steps
AI BlackRock UK Equity Fund	Astrazeneca Plc	7.1	11/04/2024	Abstain	Approve Remuneration Policy	Governance	<p>The new policy suggests increasing the LTIP (Long-Term Incentive Plan) opportunity from 650% to 850% of salary and bonus potential from 250% to 300% of salary. While typically opposed, the Company argues these changes are necessary to attract talent, especially in the US, where a significant portion of revenue is generated.</p> <p>Executives will only benefit from the increased pay if they achieve strong long-term returns, with performance thresholds becoming more stringent. However, concerns remain about the vesting of LTIP awards at lower performance levels, which will rise from 130% to 170% of salary. This is seen as excessive and contradicts the</p>	<input checked="" type="checkbox"/>	<p>Aviva acknowledges that without enhanced flexibility in executive compensation, certain companies may encounter difficulties in attracting and retaining talent in a competitive global market. However, Aviva is committed to preventing excessive compensation for executive directors when performance is mediocre or subpar. The organization will</p>

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

Fund	Company	Approx. Size of Holding at date of vote	Date	How the manager voted	Summary of the Resolution	Priority Area for significanc e	Rationale for the Manager vote	Final outcome	Next Steps
							Company's claims about performance stretch. If not addressed by the next AGM, there will be a return to voting against the pay arrangements.		continue to engage with the company to ensure that an appropriate balance is maintained.
AI BlackRock UK Equity Fund	Shell Plc	7.6	21/05 /2024	Against	Approval of Energy Transition Update and Energy Transition Strategy 2024	Environment (climate change)	Aviva lacks conviction that Shell's current strategy and capex plans align to its overarching commitment to the goals of the Paris Agreement.	<input checked="" type="checkbox"/>	Aviva believes the continued, regular and constructive engagement over FY24 will be more effective in refining its strategy for success.
	GSK Plc	3.0	08/05 /2024	Abstain	Approve Remunerati on Policy	Governance	While there are no significant concerns regarding pay outcomes for the year, the abstention reflects the belief that there were windfall gains from the recently vested LTIP awards, warranting some downward discretion. GSK's disclosures and engagement did not sufficiently explain why the LTIP awards granted in February 2021 were not reduced.	<input checked="" type="checkbox"/>	Aviva will continue to engage with the company, to ensure that high levels of pay are granted for high levels of performance.

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

Fund	Company	Approx. Size of Holding at date of vote	Date	How the manager voted	Summary of the Resolution	Priority Area for significanc e	Rationale for the Manager vote	Final outcome	Next Steps
AI BlackRock 50/50 Global Equity	Shell Plc	3.8	21/05 /2024	Against	Regarding Scope 3 GHG Target and Alignment with Paris Agreement	Environment (climate change)	Aviva voted against the shareholder resolution to increase the ambition of Shell's emission reduction targets, as it believed that such a move would not enhance shareholder value and could unduly constrain the board's decision-making.	<input checked="" type="checkbox"/>	Aviva believes the continued, regular and constructive engagement will be more effective in refining its strategy for success.
Stewardshi p Internatio nal Fund	London Stock Exchange Group Plc	2.1	25/04 /2024	For	Approve Remunerati on Policy	Governance	Aviva exceptionally supported as having been consulted by LSEG on the changes. Aviva accepts that following the transformation of the business in recent years LSEG now genuinely operates in a global industry, with many of these peers, and the majority of earnings, US-based. The Company is experiencing extreme pay compression between the CEO and other recently hired senior executives. The vote also considers the CEO's outstanding past performance and strategic direction.	<input checked="" type="checkbox"/>	Aviva acknowledges that without enhanced flexibility in executive compensation, certain companies may encounter difficulties in attracting and retaining talent in a competitive global market. However, Aviva is committed to preventing excessive compensation for executive directors when

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

Fund	Company	Approx. Size of Holding at date of vote	Date	How the manager voted	Summary of the Resolution	Priority Area for significanc e	Rationale for the Manager vote	Final outcome	Next Steps
Stewardship International Fund									performance is mediocre or subpar.
	Ashtead Group Plc	1.2	04/09 /2024	For	Approve Remuneration Report	Governance	Aviva has supported Ashtead's executive pay increases after consultations, acknowledging the company's struggle to compete with higher U.S. pay levels, which poses a retention risk despite Ashtead's strong performance. The proposed pay is at the 25th percentile of its primary benchmark and the 75th percentile within the FTSE 50. While the pay gap has narrowed, Ashtead aims for balance. The higher incentives are backed by a lower base salary compared to UK FTSE 100 peers, and the vesting period for restricted shares has been extended with performance thresholds established.	<input checked="" type="checkbox"/>	The outcome of the vote will have a bearing on whether the company retains its UK listing. Aviva followed up with the company detailing the issues that Aviva will be keeping under close review / be part of Aviva's considerations going forward.
	Relx Plc	2.7	25/04 /2024	For	Elect Paul A. Walker	Environment (resource degradation) & Governance	Aviva typically opposes the Chair's re-election based on its social and environmental engagement strategies. However, due to Relx's recent commitment to establish science-based	<input checked="" type="checkbox"/>	Aviva will continue to monitor and engage with the company on progress

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

Fund	Company	Approx. Size of Holding at date of vote	Date	How the manager voted	Summary of the Resolution	Priority Area for significanc e	Rationale for the Manager vote	Final outcome	Next Steps
Stewardship International Fund							targets (SBTs) and an improvement in its CDP Forests score from C to B, Aviva is voting in favour of the Chair this time. Aviva acknowledges the company's progress and engagement on climate change and human rights issues.		regarding its deforestation and human rights practices.
	Unitedhealth	4.7	03/06 /2024	Against	Elect F. William McNabb, III	Governance	Aviva is opposing the election of a director who served on the audit and finance committee during the previous fiscal year, citing their oversight of cybersecurity. In February 2024, the company faced a major cybersecurity incident. Although Aviva acknowledges the company's responsive measures and significant remedial actions, including efforts to rebuild systems and support affected healthcare practices, it expresses concern regarding the committee's effectiveness in safeguarding shareholder interests. Aviva highlights that the actions leading up to the breach, particularly after the acquisition of Change	<input checked="" type="checkbox"/>	Given the significant impact of the cybersecurity breach, Aviva holds McNabb accountable for the shortcomings in the company's defences. Aviva expects him to step back and would like the company to show their understanding of the need for stronger governance and accountability in managing

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

Fund	Company	Approx. Size of Holding at date of vote	Date	How the manager voted	Summary of the Resolution	Priority Area for significanc e	Rationale for the Manager vote	Final outcome	Next Steps
							Healthcare in 2022, raise questions about the committee's performance.		cybersecurity risks to protect shareholders' interests.
	Amazon	3.6	22/05 /2024	For	Shareholder Proposal Regarding Report on Plastic Packaging	Environment (Climate change)	This proposal is in line with the expectations in the VBDO (Vereniging van Beleggers voor Duurzame Ontwikkeling) Investor Statement on Plastic AI (Action Initiative) signed in May 2023 that FMCG (fast-moving consumer goods) and grocery retail companies should 'establish a clear plan of action to reduce material consumption in absolute terms, prioritising eliminating the need for single-use packaging altogether. Issuing a report and setting this goal would be important steps in this journey.	<input checked="" type="checkbox"/>	Following a similar proposal last year, Amazon took a positive step by releasing some data on plastic use in packaging from its owned and operated fulfillment centres. However, the Company lags competitors who have disclosed this data. Aviva will continue to monitor progress on this issue.
AI US Equity Index Fund	Broadcom Inc	1.2	22/04 /2024	Against	Advisory Vote on Executive Compensati on	Governance	Remuneration Report - Following the unsuccessful Say on Pay resolution in 2023, which experienced 67.39% dissent due to significant equity grants to	<input checked="" type="checkbox"/>	Aviva have escalated concerns by voting against the Remuneration

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

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							the CEO, the Company failed to provide a sufficient response to shareholder concerns. Currently, only 50% of Long-Term Incentive Plan (LTIP) awards are performance-based, reflecting a misalignment with performance objectives. The CEO-to-employee pay ratio of 510:1, an increase of 125:1 from the prior year, is considered excessive. Additionally, there are deficiencies in established performance criteria, unchallenging metrics, and inadequate risk-mitigating policies, further exacerbating the misalignment between pay and performance.		Report, as communicated to the company.
AI Japanese Equity	Toyota Motor Corporat ion	5.4	18/06 /2024	For	Shareholde r Proposal Regarding Lobbying Activity Alignment with the Paris Agreement	Environment (Climate change)	This proposal requests that the Company conduct an annual review and issue a report on its climate-related lobbying activities, both direct and through industry associations. The report should assess how these activities help mitigate climate change risks for the	<input checked="" type="checkbox"/>	The proposing shareholder finds the Company's 2022 report inadequate and requests enhanced disclosures on its lobbying activities to

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

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AI Japanese Equity							Company and align with the goals of the Paris Agreement, as well as the Company's target of achieving carbon neutrality by 2050. While the Company has published a climate lobbying report, it does not meet expectations. We continue to support this proposal, as we believe that enhanced disclosures in this area would provide investors with valuable insights to better evaluate the Company's risks associated with its lobbying efforts.		better assess associated risks. While the Company aims for carbon neutrality by 2050, a detailed report is needed to clarify how lobbying supports this goal. The resolution also seeks information on the review process for trade association memberships and strategies to address any misalignment with the Company's objectives and the Paris Agreement.
	Honda Motor Co	1.19	19/06 /2024	Against	Elect Asako Suzuki	Governance and Environment (Climate change)	The statement articulates the expectation for high-impact companies to adopt a structured approach to climate-related risk and opportunity assessment, including the		Aviva will keep monitoring how the company addresses climate change and human rights-related

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

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							establishment of science-based emission reduction targets (SBT) validated by the Science-Based Targets Initiative (SBTi) in line with a 1.5°C pathway, and compliance with the Taskforce on Climate-related Financial Disclosures (TCFD) recommendations. Due to insufficient progress in these areas, the resolution is referred for internal review.		issues going forward and also engage on these topics.
	Hitachi Ltd	2.2	21/06/2024	Against	Elect Keiji Koshima; and Elect Toshiaki Higashihara	Governance	Women are not sufficiently represented on the board.	<input checked="" type="checkbox"/>	Aviva voted for the first time against the re-election of two directors to reflect our ongoing concerns over the lack of gender diversity on the board (16.7%).
	Mizuho Financial Group	1.2	26/06/2024	Against	Elect Director Furukawa, Shuntaro	Governance	Women are not sufficiently represented on the board.	<input checked="" type="checkbox"/>	Aviva escalated their ongoing concerns over the lack of gender diversity on the

The Professional Golfers' Association Scheme 2001 Retirement and Death Benefits Scheme

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									board (14.3%) by voting against the Chair of the nomination committee.
AI Developed Asia Pacific	Woodside Energy Group Limited	1.2	24/04 /2024	Against	Approval of Climate Transition Action Plan and 2023 Progress Report	Environment (climate change)	Aviva have significant concerns regarding the Company's responsiveness to shareholder issues, a persistent problem that has not been sufficiently addressed in recent years. The concerns have intensified due to the Company's inadequate responses to shareholder dissent since 2020. At that year's AGM, a proposal requesting alignment of greenhouse gas emissions with the Paris Agreement received majority support (52%), yet there has been no disclosure on how the Company engaged with shareholders on this matter, nor was the proposal implemented.		The company's lack of responsiveness to shareholder climate concerns has been a longstanding issue, prompting Aviva to vote against the Chair of the Board. Aviva plans to engage with the company on this matter, emphasizing that it is no longer acceptable for the Board to ignore shareholder concerns.

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AI Developed Asia Pacific	Hyundai Motor Co	1.1	21/03 /2024	Against	Elect CHANG Jae Hoon	Governance (Diversity)	This director is the longest serving member of the nomination committee, and this vote reflects Aviva ongoing concerns over the lack of gender diversity on the Board (still just two females representing 16.7%) The manager also have concerns over the Nomination Committee independence. He is one of two executive directors on the committee and ideally it should be comprised of non-executives only, with perhaps the executive Chair participating when necessary.		The company's responsiveness to its shareholders on climate concerns has been a long-running concern at the Company and they also voted against the Chair of the Board to reflect this. In fact, Richard Goyder received a 16.6% vote against his re-election which is even more significant given shareholders were aware that this will be his last year on the board. Aviva will be engaging with the company on this issue. It is now inconceivable for

The Professional Golfers’ Association Scheme 2001 Retirement and Death Benefits Scheme

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									the Board to continue its trend of dismissing shareholder concerns following this overwhelming rejection of Woodside’s climate plan.

Source: Aviva as at 31 December 2024.