



The Cromwell Group (Holdings) Limited Pension and Life Assurance Scheme

31 August 2025

Background and Implementation Statement

Background

The regulatory landscape continues to evolve as ESG becomes increasingly important to regulators and society. The Department for Work and Pensions ('DWP') has increased the focus around Environmental, Social and Governance ('ESG') policies and stewardship activities by issuing further regulatory guidance relating to voting and engagement policies and activities. These regulatory changes recognise the importance of managing ESG factors as part of a Trustee's fiduciary duty.

Implementation Report

This implementation report is to provide evidence that the Cromwell Group (Holdings) Limited Pension and Life Assurance Scheme continues to follow and act on the principles outlined in the Statement of Investment Principles ('SIP').

The SIP can be found online at the web address <https://www.isio.com/scheme-documents/cromwell-group-holdings-limited-pension-and-life-assurance-scheme-statement-of-investment-principle/> and changes to the SIP are detailed on the following page.

This Implementation Report details:

- actions the Cromwell Group (Holdings) Limited Pension and Life Assurance Scheme has taken to manage financially material risks and implement the key policies in its SIP
- the current policy and approach with regards to ESG and the actions taken with managers on managing ESG risks
- the extent to which Cromwell Group (Holdings) Limited Pension and Life Assurance Scheme has followed policies on engagement covering engagement actions with its fund managers and in turn the engagement activity of the fund managers with the companies in the investment mandate (note that this detail is covered by the attached report, provided by Mobius)
- voting behaviour covering the reporting year up to 31 August 2025 for and on behalf of the Cromwell Group (Holdings) Limited Pension and Life Assurance Scheme including the most significant votes cast by the Cromwell Group (Holdings) Limited Pension and Life Assurance Scheme or on its behalf (note that this detail is covered by the attached report, provided by Mobius).

Implementation Statement

This report demonstrates that the Cromwell Group (Holdings) Limited Pension and Life Assurance Scheme has adhered to its investment principles and its policies for managing financially material considerations including ESG factors and climate change.

Signed

Position

Date

Managing risks and policy actions DB

Risk / Policy	Definition	Policy	Actions and details on changes to policy
Interest rates and inflation	The risk of mismatch between the value of the Scheme assets and present value of liabilities from changes in interest rates and inflation expectations.	To hedge the vast majority of these risks through the buy-in policy and the residual asset portfolio.	<p>Over the reporting period, the Scheme completed a buy in transaction with Aviva. This policy insures pensioner and deferred benefits. The buy in policy and residual asset portfolio hedge most of the Scheme's interest and inflation risk.</p> <p>Within the residual asset portfolio the Trustee invests in nominal and index-linked Gilt funds as well as a cash fund.</p>
Liquidity	Difficulties in raising sufficient cash when required without adversely impacting the fair market value of the investment.	To maintain a sufficient allocation to liquid assets so that there is a prudent buffer to pay members benefits as they fall due. This is achieved through the buy-in policy (which is expected to make monthly payments to meet routine cashflows) and investment of the residual assets in funds with daily liquidity.	<p>Following the completion of the buy-in, Aviva make payments to the Scheme on a monthly basis to pay member benefits.</p> <p>All assets within the residual asset portfolio are also traded on a daily basis.</p>
Market	Experiencing losses due to factors that affect the overall performance of the financial markets.	To remain appropriately diversified and hedge away any unrewarded risks, where practicable. This is predominately achieved through the buy-in policy.	<p>Prior to the completion of the buy-in, the Scheme maintained diversification within its asset portfolio through its investments in a diverse range of credit funds.</p> <p>To fund the insurance premium, the Scheme sold the majority of its credit assets and transferred these proceeds to Aviva.</p> <p>The residual asset portfolio is invested in nominal and index-linked Gilts and cash.</p> <p>These residual assets are deemed to have limited</p>

			exposure to market risks outside of interest rate and inflation risks.
Credit	<p>Default on payments due as part of a financial security contract.</p>	<p>To appoint investment managers who actively manage this risk by seeking to invest only in debt securities where the yield available sufficiently compensates the Scheme for the risk of default.</p> <p>The insurer will manage credit risk within their portfolio as they see fit.</p> <p>The residual assets are invested into UK Government Bonds and Money Market Instruments which have a high credit rating and low level of default risk.</p>	<p>The majority of the Scheme's assets are invested in a buy-in policy where the insurer will manage credit risk.</p> <p>Aviva currently hold a AA-credit rating from S&P and Fitch and are tightly regulated by the Financial Conduct Authority ('FCA') and the Prudential Regulation Authority ('PRA').</p> <p>The residual assets are invested in money market instruments and UK government bond funds where the credit quality of the underlying is high.</p>
Environmental, Social and Governance	<p>Exposure to Environmental, Social and Governance factors, including but not limited to climate change, which can impact the performance of the Scheme's investments.</p>	<p>To delegate to the insurer and investment manager the consideration of ESG factors in determining the appropriate holdings within their portfolios.</p>	<p>Further detail provided later in this report</p>
Currency	<p>The potential for adverse currency movements to have an impact on the Scheme's investments.</p>	<p>The management of currency risk within their respective portfolios is delegated to the insurer and investment manager.</p> <p>The buy-in policy will make payments in GBP and the underlying investments in the residual assets are predominantly invested in the GBP instruments.</p>	<p>All the Scheme's investments are in GBP denominated share classes, with underlying currency exposures managed by professional investment managers.</p>

Changes to the SIP

Over the reporting period, the Trustee made changes to the SIP to reflect the following:

- The Scheme's buy-in policy with Aviva
- The Scheme's residual asset portfolio and new strategic asset allocation
- The Trustee's policies for managing the following risks:
 - Funding
 - Covenant
 - Interest rates and inflation
 - Liquidity
 - Credit
 - Environmental, Social and Governance
 - Currency
- The Trustee's policies on manager remuneration

Current ESG policy and approach

ESG as a financially material risk

The SIP describes the Scheme's policy with regards to ESG risk. As the Scheme has now completed a buy-in transaction the majority of the assets have been transferred to an insurer. The Trustee delegates the consideration of ESG factors to the insurer and residual investment manager.

The remaining residual assets of the Scheme are invested in pooled vehicles through the Mobius Life Platform and the Trustee accepts that pooled investments will be governed by the individual policies of the investment manager. These policies are reviewed as part of the consideration of pooled investments. As such, the Trustee has given the investment managers full discretion in evaluating ESG factors, exercising voting rights and stewardship obligations attached to the investments, in accordance with their own governance policies.

Engagement and Voting

The Trustee has appointed Mobius Life as the platform provider. Mobius Life has adopted the managers' definitions of significant votes and given the Trustee has not set any stewardship priorities, Mobius have not collected feedback on these.

Please see the documents provided by Mobius Life overleaf for details on engagement and voting actions including a summary of the activity, covering the 12-month period ending 31 August 2025.

Cromwell Group (Holdings) Limited Pension and Life Assurance Scheme - IS0008708

ESG REPORT – 31-August-2025



Fund	Fund Manager ESG Credentials	Fund ESG Credentials	
	Data Provided by FM as at	% Qs answered	Data Provided by FM as at
L&G Life Y All Stocks Index-Linked Gilts Index Fund	30/06/2025	93	30/06/2025
L&G Life AF Over 15 Years Gilt Index Fund	30/06/2025	93	30/06/2025
L&G Life TA Sterling Liquidity Fund	30/06/2025	95	30/06/2025

Disclaimer:

This report has been designed by Mobius Life to support Pension Schemes. Mobius Life understand the information produced in this report may be used as an input for an implementation statement but is not responsible for producing the implementation statement. When compiling this report, Mobius Life has shared all the information provided by the external fund manager. Where a response field is blank this means the question is not applicable or a response was not provided by the fund manager.

Mobius Life accepts no responsibility or liability for the accuracy or content of the data provided by the external fund managers.

Questions	Legal and General (LGIM)		
<p>Do you have an ESG policy that is integrated into the investment process?</p>	<p>Yes</p> <p>Our policies are implemented consistently at a firm-wide level. LGIM's purpose is to create a better future through responsible investing. Aligned to this purpose, ESG is a central underpinning to all of LGIM's activities and especially within strategic initiatives. LGIM has developed and publicly disclosed its policies for stewardship activities. Our policies are reviewed annually and updated where necessary to ensure they remain aligned with the various evolving regulations, best practice and client feedback.</p>	<p>Are Senior Management accountable for ESG or Climate Change risks?</p>	<p>Yes</p> <p>We have many people across the business contributing to our ESG insights and research. They sit across various teams with different levels of responsibility relating to ESG but all feed into our responsible investing capabilities. As at the end of June 2022, there are a total of 47 LGIM employees with roles dedicated to ESG, some of which are outlined in more detail below. • There are 20 people in our global Investment Stewardship team, led by Kurt Morriesen. The team is responsible for developing and carrying out LGIM's investment stewardship and responsible investment activities as well as the oversight, implementation and integration of ESG across the firm. • Nick Stansbury, Head of Climate Solutions, leads our energy transition approach and is one of our most prominent spokespeople on this topic. He leads our Climate Solutions team which has a total of four team members. • As Global Head of Responsible Investment Integration, Michael Marks' role spans all functions within LGIM from investment stewardship, distribution and investment teams to operational functions such as data and technology; embedding ESG across the firm in all areas and ensuring that focus is maintained on delivering the capabilities required by all stakeholders. • Amelia Tan has recently joined LGIM as the Head of Responsible Investing Strategy for Investments (January 2022). This role ensures that LGIM stays at the cutting edge of innovation within responsible investing and creates a coordinated approach across asset classes, which is embedded throughout our funds and portfolios. • Caroline Ramscar, Head of Sustainable Solutions, is responsible for engaging with clients on sustainability and the development of responsible investment solutions. This is a role which was created to develop LGIM's sustainable strategy. Two further colleagues are dedicated to supporting clients' journeys to adopt more responsible investing strategies. • LGIM's Real Assets team has a team of seven dedicated ESG experts working across the range of private credit and real estate strategies that we manage. As at the end of June 2022, we also have a further 62 colleagues across Investments whose roles have very substantial contribution to our responsible investing capabilities and whose objectives reflect this although their responsibilities are broader than solely ESG. Our Global Research and Engagement Groups (GREGs) bring together colleagues from across LGIM to identify the challenges and opportunities that will determine the resiliency of sectors and the companies within them. The output from the group strengthens and streamlines the firm's engagement activities across investments and stewardship, to enable us to collectively set goals and targets at a company level with one voice, whilst supporting and guiding our investment decisions across the capital structure. As at the end of June 2022, there are over 70 participants which includes members of our investment teams primarily along with representation from Investment Stewardship, who overlap on these groups.</p>
<p>Do you have a firm ESG rating?</p>	<p>Yes</p> <p>LGIM has an award-winning Investment Stewardship team, with a track record of over 20 years. External validation and oversight keep us on our toes and propels us forward to keep improving. We participate in industry-wide assessments of our engagement and stewardship processes and are proud to have been nominated by industry bodies like the ICGN, ICSA and UN PRI for our: • Engagement activities disclosure • Market-wide involvement in lobbying activities • Strong implementation of ESG and corporate governance matters into our stewardship activities.</p>	<p>Do you have a dedicated team that considers ESG and Climate Change related factors?</p>	<p>Yes</p> <p>There are a total of 37 LGIM employees with roles dedicated to ESG. In addition, we have a further 58 colleagues whose roles have very substantial contribution to our responsible investing capabilities and whose objectives reflect this although their responsibilities are broader than solely ESG.</p>
<p>Please provide your UNPRI survey scores</p>		<p>Do you rely on any third parties to provide ESG and Climate Change related analysis/research?</p>	<p>Bloomberg, CDP, Diligent, HSBC, InfluenceMap, ISS, IVIS, Maplecroft, Refinitiv, RepRisk, Sustainalytics We obtain a large ESG raw data set from a wide range of data and analysis providers which can be used for voting, engagement, research, index/portfolio construction and management. We typically licence raw data from</p>

Fund Manager Business Response

Questions	Legal and General (LGIM)		
			such providers, as opposed to off-the-shelf ESG scores/rating, as we believe our knowledge and expertise of investing and engaging with companies are best placed to identify material and relevant ESG factors. This quantitative data is supplemented by qualitative research from academic and NGO research as well as sell-side broker reports.
Do you have a Climate Change policy that is integrated into the investment process?	<p>Yes</p> <p>We have developed proprietary ESG tools, used across different asset classes and investment strategies, which incorporate climate change metrics such as carbon emissions, fossil fuel exposure or 'green' revenues. These tools are used to support fund managers, develop new investment solutions, assist the investment stewardship team in its engagements with companies, and help clients understand more about the climate risks and opportunities in their portfolios. LGIM has developed a bespoke climate solutions framework, Destination@Risk, which allows us to quantify the implications of different climate change scenarios across the global economy, key sectors, and individual securities, including a forward-looking assessment of 'temperature alignment'. The outputs of the framework are used to inform our climate-related engagements, to support our investment process, and to develop climate reporting for clients.</p>	Do you create your own ESG or Climate Change related scores	<p>Yes</p> <p>We have developed a rules-based methodology by which to score companies against ESG metrics; this generates the LGIM ESG Score. The LGIM ESG Score aligns with how we engage with, and vote on, the companies in which we invest. To facilitate this process, we publish the scores and explain the metrics on which they are based. In addition, the ESG score is used by our index teams in the creation of ESG aligned index-products. We have identified 30 ESG indicators based on our expertise and experience in corporate reporting, corporate disclosures and transparency. We developed the scores with the aim of improving market standards globally, while monitoring ESG developments across our entire investment universe. The scores help drive our engagement process and are aligned with LGIM's voting policy and principles – we are more likely to vote against companies with poor scores at their annual general meetings (AGMs).</p>
Does your company have a policy on equality and diversity in the workplace?	<p>Yes</p> <p>LGIM is an award winning company, we are committed to delivering the right products and solutions to our clients and we believe the key to our success is our people. Steered by the Executive team, diversity and inclusion is embedded in our culture from the way we recruit, develop and connect with employees, to how we steward responsible investing through ESG. To show our commitment to making diversity and inclusion part of everything we do, the role of Head of Inclusion & Culture was created in 2018. Colette Comerford was appointed to the role with responsibility for driving the evolution and continuous improvement of LGIM's culture, diversity and inclusion objectives, working closely with the executive team, our Senior HR team, LEGIT (Legal & General Inclusion team) and L&G's Group Diversity and Inclusion team.</p>	Do you provide any reporting publicly or to clients with regard to ESG and Climate Change related issues? How often?	<p>Yes</p> <p>Quarterly</p>
Do ESG related factors get considered with respect to performance management of investment companies and funds?	<p>Yes</p> <p>ESG factors are embedded into our evaluation of investment opportunities across many investment strategies to identify unrewarded risk, and protect and enhance the long-term value of all our clients' investments. Our investment framework is designed with several objectives in mind: • Encouraging companies to improve their behaviour, and the quality of their ESG disclosures, we can raise the standards of entire markets, and help generate sustainable, long-term returns for our clients • Assessing a company's ESG risks: we see unmanaged ESG factors, meanwhile, as posing potential risks and opportunities, which can have a material impact on the performance of investments • Identifying the winners of the future, the companies to which investors will allocate ever-larger amounts of capital.</p>	Are you signatories of the FRC UK Stewardship Code or equivalent?	<p>Yes</p> <p>LGIM has been a signatory to the UK Stewardship Code every year since its inception and we provide copies of our responses on our website.</p>

Fund Manager Product Response

Activity	L&G Life Y All Stocks Index-Linked Gilts Index Fund		
Do you undertake Engagements for this fund?	No	Please provide details on why you do not undertake engagements for this fund.	Gilt Fund
Do you engage in voting for this fund?	No	Please provide details on why you do not engage in voting for this fund.	Gilt Fund
Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Yes - the fund produces approximately 132.4 Weighted Average Carbon Emissions Scope 1 + Scope 2 (Tonnes CO2e per 1 million USD Invested) as of 30 June 2025	What was the actual turnover rate over the last 12 months?	

Activity	L&G Life AF Over 15 Years Gilt Index Fund		
Do you undertake Engagements for this fund?	No	Please provide details on why you do not undertake engagements for this fund.	Gilt Fund
Do you engage in voting for this fund?	No	Please provide details on why you do not engage in voting for this fund.	Gilt Fund
Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Yes - the fund produces approximately 132.4 Weighted Average Carbon Emissions Scope 1 + Scope 2 (Tonnes CO2e per 1 million USD Invested) as of 30 June 2025	What was the actual turnover rate over the last 12 months?	

Activity	L&G Life TA Sterling Liquidity Fund		
Do you undertake Engagements for this fund?	Yes		
How many engagements have you had with companies in the past 12 months?	38	How many engagements were made regarding environmental topics?	29
How many engagements were made regarding social topics?	4	How many engagements were made regarding governance topics?	10
Which form of engagement is most representative of the approach taken for this fund over the last 12 months: <ul style="list-style-type: none"> • Sending standardised letters to companies • Sending bespoke letters to companies • Standard period engagement with companies • Active private engagement on specific issues • Active public engagement on specific issues 		How many engagements were made regarding other issues?	
Please discuss some of the key engagements and outcomes from the last 12 months.	-		
Do you engage in voting for this fund?	No	Please provide details on why you do not engage in voting for this fund.	Liquidity Fund

Fund Manager Product Response

Activity	L&G Life TA Sterling Liquidity Fund		
Do you monitor the carbon emission levels or similar of the underlying companies in the fund?	Yes - the fund produces approximately 1.0 Weighted Average Carbon Emissions Scope 1 + Scope 2 (Tonnes CO2e per 1 million USD Invested) as of 30 June 2025	What was the actual turnover rate over the last 12 months?	

Important Information

Mobius Life Limited (Mobius Life) has prepared this report for professional advisers and institutional investors only. The purpose of this report is to provide information on Mobius Life's own products and services and nothing in this presentation, or any supporting material, should be regarded as a personal recommendation. This report is not intended for onward transmission.

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Within a fund, the asset allocations and choice of asset managers are at the discretion of Mobius Life and may change without notification to the investor.

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