

The Pensions Trust 2016

# Annual Report and Financial Statements 2025

Pension Scheme Registration Number 12013479



## Contents

Trustee and Advisors.....	1
Trustee’s Report.....	3
Statement of Trustee’s responsibilities .....	15
Independent auditors’ report to the Trustee of The Pensions Trust 2016.....	17
Financial Statements.....	21
Notes to the Financial Statements.....	24
Independent auditors’ statement about contributions to the Trustee of The Pensions Trust 2016 ...	51
Summary of Contributions.....	53
Summary of Actuarial Certificates .....	55
Appendix 1 - SIP Implementation Statement .....	57

## Trustee and Advisors

<b>Trustee</b>	Verity Trustees Limited
<b>Chair of the Trustee Board</b>	Joanna Matthews
<b>Co-opted Directors</b>	Joanna Matthews – Independent Chair
<b>Employer-Nominated Directors</b>	Paul Oldroyd Dean Waddingham Roger Boulton (appointed 1 October 2024) Daniel Jackson (appointed 1 October 2024)
<b>Member-Nominated Directors</b>	Thomas Hague Helen Astle Chris Roles (resigned 12 May 2025) Lauren Whitworth (appointed 1 October 2024) Jayne King (appointed 1 October 2025)
<b>Pensions Manager and Administrator</b>	TPT Retirement Solutions Limited
<b>Fiduciary Investment Manager</b>	TPT Investment Management Limited
<b>Scheme Actuary</b>	Michael Kelly FIA Mercer Limited
<b>Independent Auditors</b>	PricewaterhouseCoopers LLP
<b>Legal Advisors</b>	Linklaters LLP CMS Cameron McKenna Nabarro LLP Pinsent Masons LLP
<b>Bankers</b>	Barclays Bank PLC

## Trustee and Advisors (continued)

<b>Investment Managers</b>	Alcentra Limited Ashmore Investment Management Limited (resigned 28 November 2024) BlackRock Investment Management (UK) Limited (resigned 30 August 2025) Carne Global Fund Managers (UK) Limited CBRE Investment Management (appointed 6 November 2024) Insight Investment Management KKR & Co. Inc. Legal & General Assurance (Pensions Management) Limited Nephila Capital Limited Ownership Capital B.V. Partners Group RBC Global Asset Management (UK) Limited Royal London Asset Management Limited (resigned 22 November 2024) Sands Capital Management, LLC Siguler Guff & Company, LP Standard Life Assurance Limited Vontobel Asset Management SA (formerly TwentyFour Asset Management LLP) (resigned 22 November 2024) Wellington Management International Limited (resigned 22 November 2024)
<b>AVC Policy Providers</b>	See listing in Note 15
<b>Insurance Policy Providers</b>	See listing in Note 14
<b>Investment Consultants</b>	TPT Investment Management Limited
<b>Custodian</b>	The Northern Trust Company
<b>Custody Consultants</b>	Thomas Murray Data Services
<b>Address for enquiries</b>	TPT Retirement Solutions Limited Aire Park, 5 <sup>th</sup> Floor 3 South Brook Street Leeds LS10 1FT Email: <a href="mailto:enquiries@tpt.co.uk">enquiries@tpt.co.uk</a> Website: <a href="http://www.tpt.co.uk">www.tpt.co.uk</a>

## Trustee's Report

For the year ended 30 September 2025

Verity Trustees Limited (the "Trustee") presents its Annual Report on The Pensions Trust 2016 (the "Trust"), together with the Financial Statements of the Trust for the year ended 30 September 2025.

### Trust Constitution and Management

The Trust is governed by Verity Trustees Limited, the sole corporate Trustee. As at 30 September 2025, the Trustee Board consisted of eight Directors, three of whom are nominated by the members, four by the employers and one Director co-opted onto the Trustee Board by the member and employer-nominated Directors. On 12 May 2025, Chris Roles resigned as Member Nominated Director ("MND") and Senior Nominated Director ("SND"). In June 2025, Paul Oldroyd was appointed as SND and on 1 October 2025, Jayne King was appointed to the Trustee Board as MND.

The Trustee Board has the following six sub-committees which comprise a combination of Trustee Board members and independent experts. The paper and minutes of sub-committee meetings are made available to all Trustee Board members.

- The Investment Oversight Committee ("IOC") normally meets four times a year. Its purpose is to oversee the performance of TPT Investment Management Limited ("TPTIM") and review policies before recommending them to the Trustee Board for approval. The Chair of the IOC is Mark Laidlaw. The Chair attends Trustee Board meetings quarterly to present a report from the IOC.
- The Funding Committee ("FC") meets at least four times a year. Its purpose is to agree scheme-specific funding and asset allocation decisions for the Trust's defined benefit pension schemes and to oversee the actuarial valuation process. The Chair of the FC is Colin Richardson, with Ian Maybury appointed to the FC as a co-opted expert. The Chair attends Trustee Board meeting quarterly to present a report from the FC.
- The Audit, Risk & Compliance Committee ("ARCC") meets four times a year to consider internal audit, internal controls, compliance, the annual audit, the Annual Report and Financial Statements, and oversight of the risk framework and the risk appetite. The Chair of the ARCC is Calum Thomson, with Felicity Bambery and John Schofield appointed to the ARCC as co-opted experts. The Chair attends Trustee Board meetings annually to present a report from the ARCC.
- The Remuneration and Appointments Committee ("RAC") meets at least twice a year to approve the remuneration strategy for all Board and Committee members. The RAC is chaired by an SND (Paul Oldroyd) and comprises only MNDs and Employer Nominated Directors ("ENDs"). The Chair presents an annual report from the RAC to the Trustee Board.

### Trustee's Report (continued)

- The Member Services Committee ("MSC") usually meets four times a year and is responsible for overseeing the services TPT Retirement Solutions Limited ("TPT RSL") provides to members, providing input on the development of service enhancements and agreeing administration policy as required. This committee is chaired by Dean Waddingham and comprises MNDs and ENDs. The Chair of the MSC presents a quarterly report to the Trustee Board.
- The Appeals and Discretions Committee ("ADC") determines appeals to the Trustee at the second stage of the Internal Disputes Resolution Procedure and exercises discretion on behalf of the Trustee. This committee is chaired by Helen Astle and comprises only MNDs and ENDs. The Chair of the ADC presents an annual report to the Trustee Board. The ADC may also refer matters arising from disputes to the MSC for further consideration.

The Articles of Association of the corporate Trustee and the Rules of the Trust contain provisions for the appointment and removal of Trustee Directors.

Joanna Matthews was the Independent Chair of the Trustee Board for the year ended 30 September 2025.

The Trustee has appointed professional advisors and other organisations to support it in delivering the Trust's objectives. These individuals and organisations are listed on pages 1 to 2. The Trustee has written agreements in place with each of them.

The Trust is a centralised occupational pension fund for non-associated employers ("employers"). There are 12 (2024: 12) segregated schemes ("schemes") within the Trust as at 30 September 2025.

## Trustee's Report (continued)

The individual schemes and the asset values are detailed below:

	<b>2025</b>	<b>2024</b>
	<b>£'000</b>	<b>£'000</b>
Coventry Building Society Staff Superannuation Scheme <sup>2</sup>	124,579.8	142,246.4
Cambridge Building Society Retirement Plan <sup>2</sup>	12,728.5	13,104.0
Darlington Building Society Pension Plan <sup>2</sup>	16,774.7	18,372.8
Frank Roberts & Sons Pension Scheme <sup>2</sup>	16,384.9	18,252.7
Heywood and Partners Ltd Pension Scheme <sup>2</sup>	12,325.7	12,907.0
Hinckley and Rugby Building Society Defined Benefit Pension Scheme <sup>2</sup>	17,073.9	18,752.1
Medicash Pension Fund <sup>2</sup>	11,678.5	12,923.1
National Counties Building Society Pension Scheme <sup>1</sup>	21,488.1	22,697.6
Reading Transport Staff Retirement Plan <sup>1</sup>	44,467.9	47,107.6
Seabourne Pension Scheme <sup>2</sup>	4,816.2	5,964.3
Together Working for Wellbeing Pension Scheme <sup>2</sup>	16,561.8	17,413.6
Waterloo Housing Association Benefit Plan <sup>2</sup>	8,779.7	9,947.3
	<b>307,659.7</b>	<b>339,688.5</b>

<sup>1</sup> Closed to new entrants

<sup>2</sup> Closed to future defined benefit accrual

## Current Economic Environment

The two key themes during the period were US trade policy and the continued optimism surrounding Artificial Intelligence ("AI"). The former came into full view on 'Liberation Day' on 2 April 2025 when the US imposed 10% or higher "reciprocal" tariffs on all countries. Following the announcement, risk assets experienced significant losses, with the S&P 500 falling by 12%, high yield corporate bond spreads increasing by 109bps, and investment grade corporate bonds widening by 24bps, within the following days.

The market recovery, however, has been rapid with risk assets reaching new highs. Global equity markets, measured by the MSCI ACWI, were up c.9% by 30 September 2025 compared to 31 December 2024, and global high yield spreads are at historic lows. A major factor sustaining investor optimism is the continued high level of investment in AI and the supporting infrastructure, such as data centres. This has led to unprecedented levels of equity market concentration in technology stocks, with the highest eight companies by market capitalisation representing c.40% of the S&P500 index in October 2025, all within the technology and semi-conductor sectors.

The above market dynamics have led the Trust's Growth Asset Portfolio to return c.9.0% over the previous 12 months to 30 September 2025, with the Trustee retaining a well-diversified portfolio in order to mitigate associated risks.

## Economic Outlook

Looking ahead, the positive sentiment currently observed in equity and credit markets may be subject to future challenges. While specific sectors of the US and global economy are supported by the AI theme, there are increasing signs that global economic growth drivers are deteriorating. In the US, these risks have led the Federal Reserve to lower interest rates three times from 4.50% to 3.75%. The significant increase in private debt investments over the previous 12 months is also showing the first signs of stress in the US. However high yield corporate bond spreads remain at historic lows.

In the UK, the Bank of England (“BOE”) responded to deteriorating expectations of economic growth by lowering the benchmark interest rate five times from 5.00% to 3.75%. Significant investor concerns with respect to the government’s bond issuance as well as sustainability of the budget deficit have driven increases in the yield of government bonds over the second and third quarters of 2025. However, market expectations for further fiscal actions ahead of the November 2025 budget led to a reduction in government bond yields at the end of October 2025. Should this trend continue, this may reduce the strain on the fiscal headroom as well as investors’ collateral requirements with respect to Liability Driven Investments.

However, market expectations for further fiscal actions ahead of the November 2025 budget led to a reduction in government bond yields at the end of October 2025.

On 28 February 2026, the US and Israel carried out a joint strike on Iran, in the process killing the Supreme leader and a number of other key leadership figures. This led to retaliatory strikes across the Middle East, and led to a surge in oil prices given concerns about the ability to export oil via the Strait of Hormuz. This has contributed to increased market volatility. As the situation is fluid, an estimate of the precise financial effect on investment assets and liabilities is not possible at the date of approval of the financial statements. The Trustee will continue to monitor any impact on the Trust as the situation develops.

## Membership and Benefits

As at the year end, there were 12 (2024: 12) participating employers.

The change in membership during the year is as follows:

	Active Members	Deferred Members	Pensioners	Beneficiaries	Total
<b>At the start of the year</b>	130	1,782	1,724	188	3,824
Members retiring	(7)	(91)	98	-	-
Members leaving prior to pension age	(11)	11	-	-	-
Transfers out	(1)	(8)	-	(1)	(10)
Full commutations	-	(9)	(1)	(2)	(12)
Deaths	-	(3)	(36)	(2)	(41)
New beneficiaries	-	-	-	17	17
Leavers with no further liability	-	(1)	(2)	-	(3)
Reclassifications*	1	(1)	-	-	-
<b>At the end of the year</b>	<b>112</b>	<b>1,680</b>	<b>1,783</b>	<b>200</b>	<b>3,775</b>

\* *Reclassifications include status updates for members who were previously recorded as leavers but retain an interest in the scheme.*

The above membership reflects the number of records held rather than individual members.

Included in the above are 126 (2024: 73) pensioners and beneficiaries whose benefits are secured by annuities. Included within the number of active members are 31 (2024: 31) paid-up members. Paid-up members are members who are still in employment but are not contributing to the Trust, though they still maintain a salary link.

## Financial Developments and Financial Statements

The Financial Statements included in this annual report are the accounts required by the Pensions Act 1995. The Financial Statements set out on pages 21 to 50 have been prepared and audited in compliance with regulations made under sections 41(1) and (6) of that Act.

## Trustee's Report (continued)

The summary financial performance of the Trust is as follows:

	<b>30 Sept 2025</b>	<b>30 Sept 2024</b>
	<b>£'000</b>	<b>£'000</b>
Total Contributions	9,163.4	7,403.9
Transfers In and Other Income	-	60,768.6
Benefits Paid or Payable	(17,802.3)	(15,449.5)
Transfers Out to Other Schemes	(1,343.9)	(313.4)
Administrative Expenses (incl. PPF levy)	(1,670.1)	(1,752.0)
<b>Net (Withdrawals)/Additions from dealings with Members</b>	<b>(11,652.9)</b>	<b>50,657.6</b>
Investment Income	7,750.4	10,373.2
Change in Market Value of Investments	(26,686.6)	12,048.9
Investment management expenses	(1,439.7)	(1,771.0)
<b>Net Return on Investments</b>	<b>(20,375.9)</b>	<b>20,651.1</b>
<b>Net (Decrease)/Increase in the Trust during year</b>	<b>(32,028.8)</b>	<b>71,308.7</b>
Net Assets at beginning of year	339,688.5	268,379.8
<b>Net Assets at end of year</b>	<b>307,659.7</b>	<b>339,688.5</b>

Developments affecting the financial performance of the Trust during the year include:

- Contributions receivable have increased by 23.8% when compared to the prior year, from £7,403.9k to £9,163.4k, as a result of the first full year of contributions being received for Heywood and Partners Ltd Pension Scheme and Reading Transport Staff Retirement Plan.
- Within Benefits Paid or Payable, the pensions payable have increased by 11.3% from £13,106.2k to £14,592.4k, largely as a result of full year pension payments being made for Heywood and Partners Ltd Pension Scheme and Reading Transport Staff Retirement Plan which transferred to the Trust in the prior year.
- There was a negative return on investments during the year to 30 September 2025 of 4.9% (2024: positive return of 7.7%). Further details on investment performance can be found on page 13.

### Pension Increases

The Rules make provision for increases to pensions in payment and deferred pensions. The increases applied depend on when the benefits are accrued and under which pension scheme. Decisions on increases are made in accordance with the provisions of each scheme, taking into account the financial position of the scheme, other relevant factors and the interests of all the categories of beneficiaries. Where pensions in payment are increased annually, this is normally by at least Limited Price Indexation "LPI", which means that the increase is capped at a maximum of either 2.5% or 5.0% depending upon when the benefits were accrued, unless scheme rules provide otherwise. Following the change in the statutory basis for increasing pensions in payment, from April 2011, pensions in payment have been calculated with reference to the Consumer Prices Index "CPI" rather than the Retail Prices Index "RPI", unless scheme rules provide otherwise.

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## Trustee's Report (continued)

The following table summarises the most recent increases applied:

	Minimum	Maximum	Average
<b>Effective date</b>			
<b>Pensions in payment</b>			
6 April 2025	0.0%	5.0%	2.6%
6 April 2024	0.0%	5.0%	3.2%

There have been no discretionary increases awarded during the reporting period (2024: none).

### Transfer Values

Cash equivalents paid during the year with respect to transfers have been calculated and verified in the manner prescribed by the Pension Schemes Act 1993 and do not include discretionary benefits. Following receipt of an insufficiency report from the Scheme Actuary, transfer values payable from the Frank Roberts & Sons Pension Scheme ("the Scheme") were reduced due to the level of underfunding in the scheme. Transfers are currently not permitted due to the Scheme being in the Pension Protection Fund ("PPF") assessment period following its employer's insolvency on 14 October 2025, except to comply with a pension sharing order on divorce.

### Report on Actuarial Liabilities

As required by Financial Reporting Standard 102, the financial reporting standard applicable in the United Kingdom and the Republic of Ireland ('FRS 102'), the Financial Statements do not include liabilities in respect of promised retirement benefits.

Under section 222 of the Pensions Act 2004, every scheme within the Trust is subject to the Statutory Funding Objective, which is to have sufficient and appropriate assets to cover its technical provisions, which represent the present value of benefits to which members are entitled based on pensionable service to the valuation date.

### Trustee's Report (continued)

This is assessed at least every three years using assumptions agreed between the Trustee and the employer and set out in the Statement of Funding Principles, a copy of which is available to scheme members on request from the address for enquiries on page 2.

The Trust's schemes are usually valued once every three years. Details of the individual schemes' actuarial valuation certifications are contained in the Summary of Actuarial Certificates section of the annual report on pages 55 to 56. In the years in between full actuarial valuations an actuarial update is prepared by the Scheme Actuary. The actuarial update is a roll-forward of the full actuarial valuation.

## Trustee's Report (continued)

The aggregate valuation of all the Trust's schemes at 30 September 2024 (the latest aggregate valuation available) is the sum total of either the full actuarial valuations at that date or the latest actuarial update.

<b>Valuation date 30 September</b>	<b>2024</b>	<b>2023</b>
	<b>£'000</b>	<b>£'000</b>
Value of Technical Provisions	371,667.7	316,703.3
Value of Assets Available to meet Technical Provisions <sup>1</sup>	333,945.1	268,379.8
as a percentage of Technical Provisions	89.9%	84.7%

<sup>1</sup>Note: In accordance with SORP 2018, the value of assets available to meet technical provisions is as at the date of the related actuarial valuation. This value excludes any annuity or AVC amounts.

The value of technical provisions is based on the Pensionable Service accrued to the valuation date and assumptions about various factors that will influence each scheme in the future, such as the levels of investment returns and pay increases, when members will retire and how long members will live. The method and significant actuarial assumptions used in general for the 2024 valuations are shown below, although there may be isolated Scheme-specific variations.

### Method

The actuarial method used in the calculation of the technical provisions is the Projected Unit Method, with a control period of one year for open schemes and of duration to Normal Pension Age for schemes closed to new entrants.

### Significant Actuarial Assumptions

**Discount Interest Rate:** Scheme-specific set by reference to a fixed interest gilt curve at the valuation date, with an adjustment for expected outperformance from scheme assets.

**Future Retail Price Inflation:** Set by reference to a market-implied inflation curve as derived from gilt prices at the valuation date.

**Future Consumer Price Inflation:** Retail Price Inflation less 1.0% per annum until 2030 and then less 0.0% per annum thereafter.

**Pension Increases:** Derived from the term-dependent rates for future retail or consumer price inflation, allowing for the caps and floors on pension increases according to the provisions of the schemes' rules.

**Pay Increases:** General pay increases of 2.0% per annum above the rates for the future consumer price inflation, with some scheme-specific variations.

**Mortality:** Mortality and morbidity tables produced by the CMI (Continuous Mortality Investigation) with the support of the Institute and Faculty of Actuaries are used. No allowance is made for the period pre-retirement. For the period post-retirement, a scheme-specific loading to

## **Trustee's Report (continued)**

the S4PxA table (for triennial valuations with an effective date of 30 September 2024) or the S3PxA table (for triennial valuations with effective dates prior to 30 September 2024) is used, with future improvements based on CMI tables with a long-term scaling factor of 1.50% for males and 1.25% for females and an A parameter of 0.25% for males and females.

Scheme Expense Reserve: A liability reserve based upon nine years of estimated expenses, payable from the Relevant Date.

### **Recovery Plan**

The arrangements for each scheme section are formalised in Schedules of Contributions that are certified by the Scheme Actuary. Details of the date of certification of each schedule can be found on page 56. A copy of the example certificate can be found on page 55.

### **Contractual Arrangements**

The Trust was party to one (2024: one) other contractual arrangement in relation to one employer (2024: one employer) that participates in the Trust.

### **GMP Equalisation**

The Trustee is currently reviewing, with its advisors, the impact of a High Court ruling made in October 2018, as well as a follow-on judgement in November 2020, concerning Guaranteed Minimum Pension (GMP) Equalisation. Further details can be found in note 24 to the Financial Statements.

### **Virgin Media Case**

The Trustee is aware of the Court of Appeal's judgment in the case of Virgin Media v NTL Pension Trustees. Further details can be found in note 25 to the Financial Statements.

## **Regulation and Governance**

The Pensions Trust 2016 is regulated by The Pensions Regulator. The Trustee has in place policies and processes to enable it to monitor compliance with applicable laws and regulations.

## **Investment Management**

### **Investment Strategy and Principles**

The Trustee is responsible for determining the schemes' investment strategies.

In accordance with section 35 of the Pensions Act 1995, the Trustee has agreed a Statement of Investment Principles ("SIP"). The version in place at 30 September 2025 were approved in October 2024. A copy of the SIP may be obtained from the address for enquiries on page 2 or can be found on TPT's website.

Trustees of most schemes with 100 or more members, such as Verity Trustees Limited, must include an Implementation Statement for all Annual Report and Financial Statements produced on or after 1 October 2020. The Implementation Statement requirements differ between Defined Contribution /

## Trustee's Report (continued)

hybrid schemes and pure Defined Benefit schemes, but the statement must set out information about how the Trustee has put its SIP into practice, particularly in relation to stewardship and engagement.

The Trustee is required to set out its opinion on how its policy and the SIP have been followed; to describe voting behaviour; and to explain any change to the SIP and the reason for it. The Trustee must also publish the Implementation Statement online and inform members about its availability.

A copy of the Implementation Statement can be found in Appendix 1 on pages 57 to 90.

## Management and Custody of Investments

The Trustee has delegated the management of its investments to professional investment managers which are listed on page 2. These managers, which are regulated by the appropriate regulatory body in their country of operation, such as the Financial Conduct Authority in the United Kingdom, manage the investments within the restrictions set out in investment management agreements which are designed to ensure that the objectives and policies set out in the SIPs are followed.

The mandates put in place by the Trustee specify how rights attaching to the Trust's segregated investments are acted upon. These include active voting participation and a requirement to consider environmental, social and governance ("ESG") and wider stewardship factors when making investment decisions. The Trustee has less influence over the underlying investments within pooled investment vehicles held by the Trust but reviews the managers' policies and statements of compliance in respect of these matters.

The Trustee is committed to being a Responsible Investor, an approach which seeks to integrate ESG considerations into investment management processes and ownership practices.

Of the environmental risks that the Trustee considers, climate change potentially presents the most material long-term risk and, in line with the recommendations set out in the Financial Stability Board's Task Force on Climate-related Financial Disclosures, we have disclosed the Trust's approach to climate-risk management on TPT's website.

The majority of the Trust's assets are held in a series of UK-domiciled unit trusts with the exception of liability hedging assets, ethical funds and any legacy assets brought by sections joining the Trust.

Carne Global Fund Managers (UK) Limited ("Carne") is the Alternative Investment Fund Manager and TPTIM is the Investment Manager to the following Funds: TPT Investment Grade Bond Fund, TPT Global Credit Opportunities Fund, TPT Liquid Assets Fund, TPT Private Credit Fund, TPT Real Assets Fund, TPT Secure Income Fund TPT and The CG TPT Global Equity Fund.

The Trustee has appointed The Northern Trust Company to keep custody of the Trust's investments, other than:

- Pooled investment vehicles and qualifying investment funds, where the manager makes its own arrangements for custody of underlying investments; and

## Trustee's Report (continued)

- Additional Voluntary Contributions and other investments which are in the form of insurance policies, where the master policy documents are held by the Trustee.

### Investment Performance

The performance of the Trust's investments compared to benchmark is summarised in the following table. The Trust manages and monitors its Defined Benefit investments in one main portfolio.

The Trust further manages and monitors three separate portfolios: the Growth Assets Portfolio, the Matching-Plus Portfolio ("MPP"), and Liability Driven Investments ("LDI"). The weightings attributed to each of these portfolios will depend on the characteristics of each scheme.

There was a negative return on investments on the main portfolio in the year to 30 September 2025 of 4.9% (2024: positive return of 7.7%).

The performance of the Trust's investments compared to benchmark is summarised in the following table.

Annualised return over:	Portfolio allocation	1 Year	3 Years	5 Years
<b>Growth Assets</b>	<b>23%</b>	<b>9.2%</b>	<b>6.2%</b>	<b>7.7%</b>
<i>Benchmark<sup>1</sup></i>		8.8%	9.0%	7.2%
<b>Matching-Plus</b>	<b>44%</b>	<b>5.0%</b>	<b>0.6%</b>	<b>(0.6)%</b>
<i>Benchmark<sup>2</sup></i>		2.9%	5.2%	(0.4)%
<b>Liability Driven Investments<sup>3</sup></b>	<b>33%</b>	<b>(21.6)%</b>	<b>(14.5)%</b>	<b>(28.7)%</b>
<i>Benchmark<sup>4</sup></i>		(21.8)%	(17.9)%	(36.2)%
<b>Main Portfolio</b>	<b>100%</b>	<b>(4.9)%</b>	<b>(4.5)%</b>	<b>(9.3)%</b>

<sup>1</sup>The aim of the Growth Assets Portfolio is to outperform cash + 4.25% per annum over rolling 5-year periods (subject to a volatility constraint). The benchmark in the table above represents the cash + 4.25% objective.

<sup>2</sup>The aim of the Matching-Plus Portfolio is to outperform the ICE BoA UK gilts 1-15 years benchmark by 1.4% per annum. The benchmark in the table above represents this objective.

<sup>3</sup>These assets employ leverage and are managed to change in line with the liabilities they cover, therefore they may show large movements on an absolute basis.

<sup>4</sup>The LDI benchmark reported is a fund-weighted composite of underlying account benchmarks.

Further details on investment performance, including against targets rather than benchmarks, for example, can be found in the Annual Review which is available on the website detailed on page 2.

## Trustee's Report (continued)

### Employer-Related Investments

The Trust invests in various housing bonds, whose underlying borrowers are drawn from a pool of registered social landlords. The names of the actual borrowers are not disclosed and can vary over time. Waterloo Housing Association is the only registered social landlord which participates in the Trust which could be an Employer Related Investment. The value of the Trust's holdings in these bonds at 30 September 2025 was £5,425.0k (2024: £5,889.5k (restated)). Further details can be found in note 23 of the notes to the Financial Statements.

Employer-Related Investments include contributions that were received later than the due date set out on the Schedules of Contributions. As at 30 September 2025, there were £nil (2024: £nil) late contributions outstanding. This represents 0.0% of net assets (2024: 0.0%).

During the year, there were three instances (2024: nil) of late payments relating to three (2024: nil) employers. Further details can be found in the Summary of Contributions on page 53.

## Statement of Trustee's responsibilities

### The Trustee's responsibilities in respect of the Financial Statements

The financial statements, which are prepared in accordance with United Kingdom Generally Accepted Accounting Practice, including the Financial Reporting Standard applicable in the UK and Republic of Ireland ("FRS 102"), are the responsibility of the Trustee. Pension scheme regulations require, and the Trustee is responsible for ensuring, that those financial statements:

show a true and fair view of the financial transactions of the Trust during the Trust year and of the amount and disposition at the end of the Trust year of its assets and liabilities, other than liabilities to pay pensions and benefits after the end of the Trust year; and

contain the information specified in Regulation 3A of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, including making a statement whether the financial statements have been prepared in accordance with the relevant financial reporting framework applicable to occupational pension schemes.

In discharging these responsibilities, the Trustee is responsible for selecting suitable accounting policies, to be applied consistently, making any estimates and judgements on a prudent and reasonable basis, and for ensuring that the financial statements are prepared on a going concern basis unless it is inappropriate to presume that the Trust will continue as a going concern.

The Trustee is also responsible for making available certain other information about the Trust in the form of an annual report.

The Trustee has a general responsibility for ensuring that accounting records are kept and for taking such steps as are reasonably open to it to safeguard the assets of the Trust and to prevent and detect fraud and other irregularities, including the maintenance of an appropriate system of internal control.

The Trustee is also responsible for the maintenance and integrity of the TPT Retirement Solutions website, [www.tpt.co.uk](http://www.tpt.co.uk). Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

### The Trustee's responsibilities in respect of contributions

The Trustee is responsible under pensions legislation for preparing, and from time to time reviewing and if necessary revising, a schedule of contributions showing the rates of contributions payable to the Trust by or on behalf of employers and the active members of the Trust and the dates on or before which such contributions are to be paid.

The Trustee is also responsible for keeping records in respect of contributions received in respect of any active member of the Trust and for adopting risk-based processes to monitor whether contributions that fall due to be paid are paid into the Trust in accordance with the schedule of contributions.

**Statement of Trustee's responsibilities (continued)**

**Approval**

The Trustee's Report on pages 3 to 16 was approved and signed for and on behalf of the Trustee on 1 April 2026.



**Joanna Matthews**  
Independent Chair  
Verity Trustees Limited

## **Independent auditors' report to the Trustee of The Pensions Trust 2016**

### **Report on the audit of the Financial Statements**

#### **Opinion**

In our opinion, The Pensions Trust 2016's Financial Statements:

- show a true and fair view of the financial transactions of the Trust during the year ended 30 September 2025, and of the amount and disposition at that date of its assets and liabilities, other than liabilities to pay pensions and benefits after the end of the year;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards comprising FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland", and applicable law); and
- contain the information specified in Regulation 3A of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996.

We have audited the Financial Statements, included within the Annual Report and Financial Statements 2025, which comprise:

- the Statement of Net Assets (available for benefits) as at 30 September 2025;
- the Fund Account for the year then ended; and
- the Notes to the Financial Statements, which include a description of the significant accounting policies.

#### **Basis for opinion**

We conducted our audit in accordance with International Standards on Auditing (UK) ("ISAs (UK)") and applicable law. Our responsibilities under ISAs (UK) are further described in the Auditors' responsibilities for the audit of the Financial Statements section of our report. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

#### **Independence**

We remained independent of the Trust in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, which includes the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

#### **Conclusions relating to going concern**

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Trust's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

## **Independent auditors' report to the Trustee of The Pensions Trust 2016 (continued)**

In auditing the Financial Statements, we have concluded that the Trustee's use of the going concern basis of accounting in the preparation of the Financial Statements is appropriate.

However, because not all future events or conditions can be predicted, this conclusion is not a guarantee as to the Trust's ability to continue as a going concern.

Our responsibilities and the responsibilities of the Trustee with respect to going concern are described in the relevant sections of this report.

### **Reporting on other information**

The other information comprises all of the information in the Annual Report and Financial Statements 2025 other than the Financial Statements, our auditors' report thereon and our auditors' statement about contributions. The Trustee is responsible for the other information. Our opinion on the Financial Statements does not cover the other information and, accordingly, we do not express an audit opinion or any form of assurance thereon.

In connection with our audit of the Financial Statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the Financial Statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If we identify an apparent material inconsistency or material misstatement, we are required to perform procedures to conclude whether there is a material misstatement of the Financial Statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report based on these responsibilities.

## **Responsibilities for the Financial Statements and the audit**

### **Responsibilities of the Trustee for the Financial Statements**

As explained more fully in the statement of Trustee's responsibilities, the Trustee is responsible for ensuring that the Financial Statements are prepared in accordance with the applicable framework and for being satisfied that they show a true and fair view. The Trustee is also responsible for such internal control as it determines is necessary to enable the preparation of Financial Statements that are free from material misstatement, whether due to fraud or error.

In the preparation of the Financial Statements, the Trustee is responsible for assessing the Trust's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Trustee either intends to wind up the Trust, or has no realistic alternative but to do so.

### **Auditors' responsibilities for the audit of the Financial Statements**

Our objectives are to obtain reasonable assurance about whether the Financial Statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee

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## Independent auditors' report to the Trustee of The Pensions Trust 2016 (continued)

that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these Financial Statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud, is detailed below.

Based on our understanding of the Trust and its environment, we identified that the principal risks of non-compliance with laws and regulations related to the administration of the Trust in accordance with the Pensions Acts 1995 and 2004 and regulations made under them, and codes of practice issued by the Pensions Regulator; and we considered the extent to which non-compliance might have a material effect on the financial statements. We also considered the direct impact of these laws and regulations on the financial statements. We evaluated incentives and opportunities for fraudulent manipulation of the financial statements, including the risk of override of controls, by the trustee and those responsible for, or involved in, the preparation of the underlying accounting records and financial statements, and determined that the principal risks were related to posting inappropriate journals to conceal misappropriation of assets. Audit procedures performed by the engagement team included:

- Testing journal entries where we identified particular fraud risk criteria.
- Obtaining independent confirmations of material investment valuations and cash balances at the year end.
- Reviewing meeting minutes, any correspondence with the Pensions Regulator, and significant contracts and agreements.
- Holding discussions with the Trustee to identify significant or unusual transactions and known or suspected instances of fraud or non-compliance with applicable laws and regulations.
- Assessing financial statement disclosures, and agreeing these to supporting evidence, for compliance with the Pensions Acts 1995 and 2004 and regulations made under them.

There are inherent limitations in the audit procedures described above. We are less likely to become aware of instances of non-compliance with laws and regulations that are not closely related to events and transactions reflected in the financial statements. Also, the risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error, as fraud may involve deliberate concealment by, for example, forgery or intentional misrepresentations, or through collusion.

A further description of our responsibilities for the audit of the financial statements is located on the FRC's website at: [www.frc.org.uk/auditorsresponsibilities](http://www.frc.org.uk/auditorsresponsibilities). This description forms part of our auditors' report.

**Independent auditors' report to the Trustee of The Pensions Trust 2016 (continued)**

**Use of this report**

This report, including the opinion, has been prepared for and only for the trustee as a body in accordance with section 41 of the Pensions Act 1995 and for no other purpose. We do not, in giving this opinion, accept or assume responsibility for any other purpose or to any other person to whom this report is shown or into whose hands it may come save where expressly agreed by our prior consent in writing.

A handwritten signature in black ink that reads "PricewaterhouseCoopers LLP". The signature is written in a cursive, flowing style.

PricewaterhouseCoopers LLP  
Chartered Accountants and Statutory Auditors  
Leeds  
1 April 2026

## Financial Statements

### Fund Account

For the year ended 30 September 2025

	Note	2025 £'000	2024 £'000
Employer Contributions		9,008.9	7,224.5
Employee Contributions		154.5	179.4
<b>Total Contributions</b>	4	<b>9,163.4</b>	<b>7,403.9</b>
Transfers in	5	-	60,768.6
		<b>9,163.4</b>	<b>68,172.5</b>
Benefits Paid or Payable	6	(17,802.3)	(15,449.5)
Transfers Out to Other Schemes	7	(1,343.9)	(313.4)
Administrative Expenses	8	(1,670.1)	(1,752.0)
		<b>(20,816.3)</b>	<b>(17,514.9)</b>
<b>Net (withdrawals) / additions from dealings with Members</b>		<b>(11,652.9)</b>	<b>50,657.6</b>
<b>Net Returns on Investments</b>			
Investment Income	9	7,750.4	10,373.2
Change in Market Value of Investments	10	(26,686.6)	12,048.9
Investment Management Expenses	11	(1,439.7)	(1,771.0)
		<b>(20,375.9)</b>	<b>20,651.1</b>
<b>Net (Decrease) / Increase in the Trust</b>		<b>(32,028.8)</b>	<b>71,308.7</b>
<b>Opening Net Assets</b>		<b>339,688.5</b>	<b>268,379.8</b>
<b>Closing Net Assets available for benefits</b>		<b>307,659.7</b>	<b>339,688.5</b>

The notes on pages 24 to 50 form part of these Financial Statements.

## Financial Statements (continued)

### Statement of Net Assets (available for benefits)

As at 30 September 2025

	Note	Total 2025 £'000	Total 2024 £'000
<b>Investment Assets</b>			
Equities	10	-	4,699.6
Bonds	10	5,425.0	5,889.5
Pooled Investment Vehicles	12	287,446.0	306,796.8
Derivatives	13	8.5	424.0
Insurance Policies	14	8,904.6	5,211.6
AVC Investments	15	336.0	532.0
Cash and Cash Equivalents	16	4,219.0	13,706.8
Other Investment Balances	16	342.1	1,280.8
		<b>306,681.2</b>	<b>338,541.1</b>
<b>Investment Liabilities</b>			
Derivatives	13	(16.9)	(59.0)
Other Investment Balances	16	-	(444.5)
		<b>(16.9)</b>	<b>(503.5)</b>
<b>Total Net Investments</b>		<b>306,664.3</b>	<b>338,037.6</b>
Current Assets	20	1,534.6	3,250.0
Current Liabilities	21	(539.2)	(1,599.1)
<b>Total Net Assets (available for benefits)</b>		<b>307,659.7</b>	<b>339,688.5</b>

The Financial Statements summarise the transactions of the Trust and deal with the net assets at the disposal of the Trustee. They do not take account of obligations to pay pensions and benefits which fall due after the end of the Trust's financial period. The actuarial position of the defined benefit schemes, which does take account of such obligations, is dealt with in the Report on Actuarial Liabilities on pages 9 to 11 of the Annual Report. These Financial Statements should be read in conjunction with this Report.

The notes on pages 24 to 50 form part of these Financial Statements.

**Financial Statements** (continued)

The Financial Statements on pages 21 to 50 have been approved and signed for and on behalf of the Trustee on 1 April 2026.



**Joanna Matthews**  
Independent Chair  
Verity Trustees Limited

## Notes to the Financial Statements

For the year ended 30 September 2025

### 1. General Information

The Trust is a centralised occupational pension fund for non-associated employers established as a trust under English Law.

The address of the Trust's principal office is Aire Park, 5th Floor, 3 South Brook Street, Leeds, LS10 1FT. The Trust is registered in the United Kingdom.

The Trust is a Defined Benefit scheme, which is closed to new members but some members maintain a salary link to their benefits upon retirement.

The Trust is a registered pension scheme under Chapter 2, Part 4 of the Finance Act 2004. This means that contributions by employers and employees are normally eligible for tax relief and income and capital gains earned by the scheme receive preferential tax treatment.

### 2. Basis of Preparation

The individual Financial Statements of The Pensions Trust 2016 have been prepared in accordance with the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, Financial Reporting Standard (FRS) 102 - The Financial Reporting Standard applicable in the UK and Republic of Ireland issued by the Financial Reporting Council ("FRS 102") and the guidance set out in the Statement of Recommended Practice "Financial Reports of Pension Schemes" (revised June 2018) ("the SORP").

### 3. Accounting Policies

The principal accounting policies of the Trust, which have been applied consistently, are as follows:

#### a. Currency

The Trust's functional currency and presentational currency is pounds sterling (GBP).

Assets and liabilities in foreign currencies are expressed in sterling at the rates of exchange ruling at the year end. Foreign currency transactions are translated into sterling at the spot exchange rate at the date of the transaction.

Gains and losses arising on conversion or translation are dealt with as part of the change in market value of investments.

#### b. Contributions and Other Income

- i. Employees' normal contributions and Additional Voluntary Contributions ("AVCs") remitted by the employer are accounted for on an accruals basis when deducted from pay.

## Notes to the Financial Statements (continued)

### 3. Accounting Policies (continued)

- ii. Employers' normal contributions remitted by the employer that are expressed as a rate of pensionable salary are accounted for on the same basis as employees' contributions, otherwise they are accounted for in the period they are due under the Schedules of Contributions.
- iii. All contributions payable under salary sacrifice arrangements are classified as employer contributions.
- iv. Employer deficit funding contributions are accounted for on the due dates on which they are payable in accordance with the Schedules of Contributions and recovery plan under which they are being paid.
- v. Special contributions include employer debt on withdrawal contributions (Section 75 debts) which are accounted for on the due dates on which they are payable with provision made where there is uncertainty of receipt.
- vi. Other income is recognised on an accruals basis.

#### c. Transfers from and to Other Schemes

- i. Group and individual transfers in are accounted for on an accruals basis, which is normally the earlier of when member liability is accepted by the Trust or the transfer value is paid.
- ii. Individual transfers out are accounted for on an accruals basis, which is normally when the transfer value is paid and member liability is discharged.
- iii. Where members of new schemes hold externally operated AVC policies, the transfer value is accounted for when the policy is transferred into the name of the Trustee. Payments out to members are made when payments are received from the policy operator.

#### d. Benefits and Payments to and on Account of Leavers

- i. Pensions in payment, including pensions funded by annuity contracts, are accounted for in the period to which they relate.
- ii. Where members can choose whether to take their benefits as a full pension or as a lump sum with reduced pension, retirement benefits are accounted for on an accruals basis on the later of the date of retirement or the date the option is exercised.

## Notes to the Financial Statements (continued)

### 3. Accounting Policies (continued)

- iii. Other benefits are accounted for on an accruals basis on the date of leaving or death as appropriate. Refunds and opt-outs are accounted for when the Trustee is notified of the member's decision to leave the Trust.
- iv. Where the Trustee agrees or is required to settle tax liabilities on behalf of a member (such as where lifetime or annual allowances are exceeded) with a consequent reduction in that member's benefit received from the Trust, any taxation due is accounted for on the same basis as the event giving rise to the tax liability and shown separately within benefits.

#### e. Administrative and Other Expenses

- i. The Trustee of The Pensions Trust 2016, Verity Trustees Limited, is also the Trustee of The Pensions Trust. The Pensions Trust pays an administration charge to TPT RSL on behalf of the Trust. The Trust pays a monthly management fee to The Pensions Trust in this respect.
- ii. Expenses which relate specifically to individual schemes are allocated to the appropriate scheme on an accruals basis.
- iii. Investment management expenses and administrative expenses, other than those relating specifically to a particular scheme, are allocated on the basis of asset values and member numbers, as appropriate.

#### f. Investment Income and Expenditure

- i. Income from equities and any pooled investment vehicles which distribute income is accounted for on an accruals basis on the date stocks are quoted ex-dividend or, in the case of unquoted instruments, when the dividend is declared.
- ii. Income from bonds is accounted for on an accruals basis and includes income bought and sold on purchases and sales of bonds. Interest on cash and short-term deposits and income from other investments are accounted for on an accruals basis.
- iii. Interest is accrued on a daily basis.
- iv. Investment income is reported net of attributable tax credits but gross of withholding taxes, which are accrued in line with the associated investment income.
- v. Income arising from annuity policies is included in investment income. Income from annuities is accounted for on an accruals basis.

## Notes to the Financial Statements (continued)

### 3. Accounting Policies (continued)

- vi. The change in market value of investments during the year comprises all increases and decreases in the market value of investments held at any time in the year, i.e. profits and losses realised on sales of investments during the year and unrealised changes in market value on amounts held at the end of the year. In the case of pooled investment vehicles which are accumulation funds, where income is reinvested within the fund without issue of further units, change in market value also includes such income.
- vii. Transaction costs are included in the cost of purchases and sale proceeds. Transaction costs include costs charged directly to the Trust such as fees, commissions, stamp duty and other fees. Other investment management expenses are accounted for on an accruals basis and shown separately within net returns on investments.

#### g. Investments

Investment assets and liabilities are included in the Financial Statements at fair value. Where separate bid and offer prices are available, the bid price is used for investment assets and the offer price for investment liabilities. Otherwise, the closing single price or most recent transaction price is used.

- i. Readily traded investments (equities, bonds and certain pooled investments) are stated at the bid price or the last traded price, depending on the convention of the stock exchange on which they are quoted.
- ii. Where quoted or unquoted unit prices are not available, the Trustee adopts valuation techniques appropriate to the class of investment. Details of the valuation techniques and principal assumptions are given in the notes to the Financial Statements where used.
- iii. Where the value of a pooled investment vehicle ("PIV") is primarily driven by the fair value of its underlying investments, the net asset value advised by the fund manager is normally considered a suitable approximation to fair value unless there are restrictions or other factors which prevent realisation at that value, in which case adjustment is made.
- iv. Over-the-counter ("OTC") derivatives are stated at fair value estimated using pricing models and relevant market data as at the year end date. Forward foreign exchange contracts are valued by determining the gain or loss that would arise from closing out the contract at the reporting date by entering into an equal and opposite contract at that date. All gains and losses arising on derivative contracts are reported within 'change in market value'.

## Notes to the Financial Statements (continued)

### 3. Accounting Policies (continued)

- i. Sole Investor Funds are disclosed within the Pooled Investment Fund note where it is determined that the Trustee exercises control over the investment mandate. Where the Trust is the sole investor by virtue of timing i.e. first in or last out of an arrangement open to other investors, the funds are not separately disclosed as a Sole Investor Fund within Pooled Investments.
- ii. Insurance policies purchased for retired members in their own names fully discharge the Trust's liability to those members and are therefore not included in these Financial Statements. The individuals are removed from membership records and the cost of purchasing the annuities is reported within payments to and on account of leavers as the former members do not have their pension paid by the Trust.
- iii. Insurance policy assets which provide benefits for members, but which are in the name of the Trustee, as detailed in note 14, are valued by the Scheme's Actuary based on the expected future pensioner benefit payments covered by the contract, discounted back to the financial year end using assumptions agreed by the Trustee on advice from the Scheme Actuary. The assets are assumed to be equal to the actuarial liability at the valuation date.
- iv. AVCs are invested in accordance with members' instructions.

#### h. Critical Accounting Judgements and Estimation Uncertainty

- i. Estimates and judgements are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances.
- ii. The Trustee makes estimates and assumptions concerning the future. The resulting accounting estimates will, by definition, seldom equal the actual results. For the Trust, the Trustee believes the only estimates and assumptions that have a significant risk of causing a material adjustment to the carrying amount of assets and liabilities within the next financial year are related to the valuation of the Trust investments and, in particular, those classified in Level 3 of the fair-value hierarchy. Explanation of the key assumptions underpinning the valuation of investments is included within (g) above and within notes 14, 18 and 19. The Trustee does not consider there to be any critical judgements.
- iii. The Trustee has determined certain pooled investment vehicles, where the Trustee was the only investor at 30 September 2025, do not meet the criteria to be classified as sole investor funds (see note 12). The Trustee does not consider there to be any other critical judgements.

**Notes to the Financial Statements (continued)**

**4. Contributions**

	Year ended 30 Sept 2025 £'000	Year ended 30 Sept 2024 £'000
<b>Employer Contributions</b>		
Normal	1,359.1	868.3
Administrative expenses	1,143.8	1,112.3
Deficit funding	6,496.5	5,237.5
AVC's	9.5	6.4
	<b>9,008.9</b>	<b>7,224.5</b>
<b>Employee Contributions</b>		
Normal	142.7	175.7
AVC's	11.8	3.7
	<b>154.5</b>	<b>179.4</b>
	<b>9,163.4</b>	<b>7,403.9</b>

**Employer normal contributions:** these include contributions in respect of salary sacrifice arrangements made available to certain members by the Employer.

**Deficit funding:** An actuarial valuation of each DB scheme will be carried out every three years. Deficit funding represents payments by schemes to eliminate past service deficits in accordance with the Schedules of Contributions prepared by the Actuary.

Total future commitments as at 30 September 2025.

	£'000
Due in 1 year	3,983.7
Due in 1 - 2 years	3,127.0
Due in 2 - 5 years	3,418.7
<b>TOTAL</b>	<b>10,529.4</b>

Deficit recovery periods differ between Schedules of Contributions. The shortest deficit recovery period is one year, with the longest being 22 years.

During the year, there were three instances (2024: nil) of late payments relating to three (2024: nil) employers. Further details can be found in the Summary of Contributions on page 53.

## Notes to the Financial Statements (continued)

### 5. Transfers In

	Year ended 30 Sept 2025 £'000	Year ended 30 Sept 2024 £'000
<b>Group Transfers in:</b>		
Investments & cash - Reading Transport Staff Retirement Plan	-	45,429.4
Investments & cash - Heywood & Partners Ltd Pensions Scheme	-	13,092.4
Cash - Coventry Building Society Staff Superannuation Scheme*	-	2,246.8
	<b>-</b>	<b>60,768.6</b>

\*This relates to a final payment in relation to a scheme transferred on 3 June 2019.

The amounts above in the prior year were received in cash, with the exception of £44,156.4k received by the transfer of ownership of investment assets.

### 6. Benefits Paid or Payable

	Year ended 30 Sept 2025 £'000	Year ended 30 Sept 2024 £'000
Pensions	14,592.4	13,106.2
Commutations and Lump Sum Retirement Benefits	3,096.7	2,304.8
Lump Sum Death Benefits	113.2	38.5
	<b>17,802.3</b>	<b>15,449.5</b>

### 7. Transfers Out to Other Schemes

	Year ended 30 Sept 2025 £'000	Year ended 30 Sept 2024 £'000
Individual Transfers Out to Other Schemes	1,343.9	313.4
	<b>1,343.9</b>	<b>313.4</b>

**Notes to the Financial Statements (continued)**

**8. Administrative Expenses**

	<b>Year ended 30 Sept 2025</b>	<b>Year ended 30 Sept 2024</b>
	<b>£'000</b>	<b>£'000</b>
Monthly Management Charge	1,359.7	1,283.4
Pension Protection Fund Levy	52.7	115.5
Scheme Specific Expenses	257.7	353.1
	<b>1,670.1</b>	<b>1,752.0</b>

Administration of the Trust is undertaken by TPT RSL. The Pensions Trust's Expenses Reserve Account pays an administration charge to TPT RSL on behalf of the Trust.

The monthly management charge represents the amounts paid to The Pensions Trust in this respect.

**9. Investment Income**

	<b>Year ended 30 Sept 2025</b>	<b>Year ended 30 Sept 2024</b>
	<b>£'000</b>	<b>£'000</b>
Income from Equities	23.7	33.7
Income from Bonds	665.5	637.9
Income from PIVs	6,603.7	9,280.5
Income from Insurance Policies	457.5	421.1
	<b>7,750.4</b>	<b>10,373.2</b>

Notes to the Financial Statements (continued)

10. Reconciliation of Net Investments

	Value at 1 Oct 2024 £'000	Purchases at cost and derivative payments £'000	Sale Proceeds and derivative receipts £'000	Change in market value £'000	Value at 30 Sept 2025 £'000
Equities	4,699.6	989.0	(6,155.4)	466.8	-
Bonds	5,889.5	-	(65.0)	(399.5)	5,425.0
Pooled Investment Vehicles	306,796.8	176,688.7	(170,482.9)	(25,556.6)	287,446.0
Derivatives - Net	365.0	629.6	(971.7)	(31.3)	(8.4)
Insurance Policies	5,211.6	4,808.9	-	(1,115.9)	8,904.6
AVC Investments	532.0	-	(128.7)	(67.3)	336.0
	<b>323,494.5</b>	<b>183,116.2</b>	<b>(177,803.7)</b>	<b>(26,703.8)</b>	<b>302,103.2</b>
Cash	13,706.8			17.2	4,219.0
Other Investment Balances (net)	836.3			-	342.1
<b>Total Investments</b>	<b>338,037.6</b>			<b>(26,686.6)</b>	<b>306,664.3</b>

Indirect transaction costs are included in the cost of purchases and deducted from sale proceeds.

Direct transaction costs analysed by main asset class and type of cost are as follows:

	2025		
	Fees £'000	Commission £'000	Total £'000
Equities	0.7	1.7	2.4
	<b>0.7</b>	<b>1.7</b>	<b>2.4</b>
	2024		
	Fees £'000	Commission £'000	Total £'000
Equities	5.4	2.3	7.7
Commodities	-	0.3	0.3
	<b>5.4</b>	<b>2.6</b>	<b>8.0</b>

## Notes to the Financial Statements (continued)

### 11. Investment Management Expenses

	Year ended 30 Sept 2025 £'000	Year ended 30 Sept 2024 £'000
Management, Administration and Custody	1,439.7	1,771.0
	<b>1,439.7</b>	<b>1,771.0</b>

Fiduciary management services are provided to the Trust by TPTIM. The Pensions Trust's Expenses Reserve Account pays an administration charge to TPTIM on behalf of the Trust. The Trust paid £1,230.2k (2024: £830.9k) in the year to The Pensions Trust in this respect.

### 12. Pooled Investment Vehicle

By type:	2025 £'000	2024 £'000
Bonds	230,400.8	116,840.9
Hedge Funds	19,926.9	-
Property	16,340.4	16,370.1
Venture Capital and Partnerships	12,182.0	14,806.1
Equities	8,595.9	9,330.0
Sole Investor Funds	-	142,412.7
Cash	-	7,037.0
	<b>287,446.0</b>	<b>306,796.8</b>

During the year ended 30 September 2024, the Trust held Sole Investor Funds ("SIFs"), included within Pooled Investment Vehicles above. The portfolios are managed by Carne Global Fund Managers (UK) Limited and Insight Investment Management with the only investor being the Trustee. For the year ended 30 September 2025, all Sole Investor Funds ("SIFs") were reclassified and are no longer disclosed as SIFs. The Trustee cannot exercise control over the investment mandate of these funds, which are open and actively marketed to other investors. with the Trust being the first investor in the funds. Subsequent to the year end, external investment has been received into these funds.

## Notes to the Financial Statements (continued)

### 12. Pooled Investment Vehicle (continued)

#### Sole Investor Funds

<b>By type:</b>	<b>2025</b>	<b>2024</b>
	<b>£'000</b>	<b>£'000</b>
Equities	-	1,416.9
Pooled Investment Vehicles	-	46,390.9
Bonds - net	-	253,247.2
Reverse Repurchase Agreements	-	34,113.9
Repurchase Agreements	-	(200,286.5)
Cash & Cash Equivalents	-	7,530.3
<b>Total Sole Investor Funds</b>	<b>-</b>	<b>142,412.7</b>

There were no direct transaction costs associated with the sole investor funds in the prior year.

#### List of Sole Investor Funds

<b>Fund name:</b>	<b>2025</b>	<b>2024</b>
	<b>£'000</b>	<b>£'000</b>
TPT Long Real Fund	-	31,528.4
TPT Short Real Fund	-	24,469.4
TPT Liquid Alternatives Fund	-	21,662.6
TPT Long Nominal Fund	-	18,114.1
TPT Secure Income Fund	-	16,018.8
TPT Short Nominal Fund	-	11,269.4
TPT Private Credit Fund	-	7,742.2
TPT Funded Short Fund	-	6,498.3
TPT Real Assets Fund	-	5,109.5
<b>Total Sole Investor Funds</b>	<b>-</b>	<b>142,412.7</b>

## Notes to the Financial Statements (continued)

### 13. Derivatives

Outstanding derivative financial instruments at the year-end are summarised as follows:

Forward Foreign Currency

Type:	Expires within	Notional Value £'000	2025 Fair Value	
			Asset £'000	Liability £'000
Buy EUR for GBP (7 contracts)	1 Year	807.0	-	(0.9)
Buy GBP for EUR (12 contracts)	1 Year	799.1	-	(7.0)
Buy GBP for JPY (12 contracts)	1 Year	512.5	5.4	-
Buy GBP for USD (13 contracts)	1 Year	4,603.4	-	(4.0)
Buy JPY for GBP (7 contracts)	1 Year	503.9	3.1	-
Buy USD for GBP (7 contracts)	1 Year	4,270.0	-	(5.0)
<b>Total 2025</b>		<b>11,495.9</b>	<b>8.5</b>	<b>(16.9)</b>
<b>Total 2024</b>		<b>19,177.0</b>	<b>424.0</b>	<b>(59.0)</b>

The notional value represents the sterling value of the foreign currency amount of the contract translated at the year-end spot rate.

#### Objectives and Policies for Holding Derivatives

The Trustee has authorised the use of derivative financial instruments by its Investment Managers as part of its investment strategy as follows:

Forward Foreign Currency: The Trustee uses forward contracts primarily for the purposes of currency risk management.

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**Notes to the Financial Statements (continued)**

**14. Insurance Policies**

The Trustee holds insurance policies with Rothesay Life, Canada Life, Aviva Life, Prudential, Just Pensions and a number of sundry insurers, as noted below, which provide annuity income to cover pensions for certain members and their beneficiaries. The valuation of these policies is completed by TPT RSL's in-house Actuary.

	<b>2025</b>	<b>2024</b>
	<b>£'000</b>	<b>£'000</b>
Insurance policies with Just Pensions*	4,167.0	-
Insurance policies with Rothesay Life	2,373.6	2,603.4
Insurance policies with Canada Life	1,624.9	1,798.3
Insurance policies with Aviva Life	467.5	515.0
Insurance policies with Prudential	221.1	239.4
Insurance policies with Phoenix Life	27.9	30.8
Insurance policies with Scottish Widows	22.6	24.7
	<b>8,904.6</b>	<b>5,211.6</b>

*\*New provider due to Seabourne Pension Scheme entering Buy-In with Just Pensions*

## Notes to the Financial Statements (continued)

### 14. Insurance Policies (continued)

The following table summarises the main financial and demographic assumptions used for the valuations of insurance policies as at 30 September 2025 and 30 September 2024:

<b>Scheme funding assumptions</b>	<b>2025 Nominal (%pa)</b>	<b>2024 Nominal (%pa)</b>
Valuation discount rate	Gilt Curve plus 0.5%	Gilt Curve plus 0.5%
Price inflation (RPI)	RPI Inflation Curve	RPI Inflation Curve
Pension increases (where not fixed):		
In line with RPI up to 5% p.a.	In line with inflation	In line with inflation
In line with RPI up to 2.5% p.a.	assumptions with relevant caps and collars, and adjusted in line with statistical distribution for increases in payment. The model used is Black-Scholes with 1.75% p.a volatility	assumptions with relevant caps and collars, and adjusted in line with statistical distribution for increases in payment. The model used is Black-Scholes with 1.75% p.a volatility
Post retirement mortality:		
Base Table	106% of S3PMA (males) and 106% of S3PFA (females) projected to the valuation date	106% of S3PMA (males) and 106% of S3PFA (females) projected to the valuation date
Improvements to mortality	CMI_2024 (A=0.25%) [S=7, 1.50%] for males CMI_2024 (A=0.25%) [S=7, 1.25%] for females	CMI_2023 (A=0.25%) [S=7, 1.50%] for males CMI_2023 (A=0.25%) [S=7, 1.25%] for females

### 15. AVC Investments

Money purchase AVCs are held within the Trust and are detailed below.

	<b>2025 £'000</b>	<b>2024 £'000</b>
AVC Investments with Scottish Widows Limited	198.4	44.5
AVC Investments with Coventry Building Society	73.3	109.9
AVC Investments with Legal & General	44.2	342.2
AVC Investments with Utmost Life and Pensions Limited	14.7	19.6
AVC Investments with Aviva Life & Pensions UK Limited	5.4	9.5
AVC Investments with Phoenix Life Limited	-	6.3
	<b>336.0</b>	<b>532.0</b>

## Notes to the Financial Statements (continued)

### 16. Cash and Other Investment Balances

	<b>2025</b>	<b>2024</b>
	<b>£'000</b>	<b>£'000</b>
Cash – Sterling	4,115.3	13,618.4
Cash – Foreign Currency	103.7	88.4
<b>Cash and Cash Equivalents Asset</b>	<b>4,219.0</b>	<b>13,706.8</b>
Accrued Investment Income	112.3	162.7
Pending transactions	229.8	1,118.1
<b>Other Investment Balances Asset</b>	<b>342.1</b>	<b>1,280.8</b>
Pending transactions	-	(444.5)
<b>Other Investment Balances Liability</b>	<b>-</b>	<b>(444.5)</b>
<b>Total Cash and Other Investment Balances</b>	<b>4,561.1</b>	<b>14,543.1</b>

### 17. Concentration of Investments

The following investments exceeded 5% of the Trust's net assets at the financial year end.

	<b>2025</b>		<b>2024</b>	
	<b>Value</b>		<b>Value</b>	
	<b>£'000</b>	<b>%</b>	<b>£'000</b>	<b>%</b>
TPT Investment Grade Bond	88,411.0	28.7%	-	-
TPT Secure Income Fund	33,511.1	10.9%	16,018.8	4.7%
TPT Long Real Fund	27,542.8	8.9%	31,528.4	9.3%
TPT Liquid Alternatives Fund	20,104.5	6.5%	21,662.6	6.4%
TPT Short Real Fund	18,854.3	6.1%	24,469.4	7.2%
TPT Long Nominal Fund	14,373.0	4.7%	18,114.1	5.3%
Royal London Corporate Bond	-	-	64,613.9	19.0%
Vontobel Fund Twentyfour	-	-	17,779.4	5.2%

## Notes to the Financial Statements (continued)

### 18. Fair Value of Investments

The fair value of investments has been determined using the following hierarchy.

<b>Investment Category</b>	<b>Description</b>
Level 1	The unadjusted quoted price in an active market for identical assets or liabilities that the entity can access at the measurement date.
Level 2	Inputs other than quoted prices included in level 1 that are observable (i.e. developed using market data) for the asset or liability, either directly or indirectly.
Level 3	Inputs are unobservable (i.e. for which market data is unavailable) for the asset or liability.

The Trust's investment assets and liabilities have been included at fair value within these categories as follows:

Pooled investment vehicles which are traded regularly are generally included in level 2. Where the absence of regular trading or the unsuitability of recent transaction prices as a proxy for fair values applies, valuation techniques are adopted and the vehicles are included in level 3 as appropriate.

The value of other pooled investment vehicles which are unquoted or not actively traded on a quoted market is estimated by the Trustee. Where the value of the pooled investment vehicle is primarily driven by the fair value of its underlying assets, the net asset value advised by the fund manager is normally considered a suitable approximation to fair value unless there are restrictions or other factors which prevent realisation at that value, in which case adjustments are made. No such adjustments have been made to the valuations at 30 September 2025 (2024: none). The assumptions underlying the Insurance Policies are detailed in note 14.

**Notes to the Financial Statements (continued)**

**18. Fair Value of Investments (continued)**

<b>Category:</b>	<b>Level 1</b>	<b>Level 2</b>	<b>Level 3</b>	<b>2025</b>
	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>Total</b>
				<b>£'000</b>
<b>Investment Assets</b>				
Equities	-	-	-	-
Bonds	-	5,425.0	-	5,425.0
Pooled Investment Vehicles	-	224,287.5	63,158.5	287,446.0
Derivatives	-	8.5	-	8.5
Insurance Policies	-	-	8,904.6	8,904.6
AVCs	-	336.0	-	336.0
Cash and Cash Equivalents	4,219.0	-	-	4,219.0
Other Investment Balances	342.1	-	-	342.1
	<b>4,561.1</b>	<b>230,057.0</b>	<b>72,063.1</b>	<b>306,681.2</b>
<b>Investment Liabilities</b>				
Derivatives	-	(16.9)	-	(16.9)
	-	<b>(16.9)</b>	-	<b>(16.9)</b>
<b>Total Investments</b>	<b>4,561.1</b>	<b>230,040.1</b>	<b>72,063.1</b>	<b>306,664.3</b>

Analysis for the prior year end is as follows:

<b>Category:</b>	<b>Level 1</b>	<b>Level 2</b>	<b>Level 3</b>	<b>2024</b>
	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>Total</b>
				<b>£'000</b>
<b>Investment Assets</b>				
Equities	4,699.6	-	-	4,699.6
Bonds	-	5,889.5	-	5,889.5
Pooled Investment Vehicles	-	262,518.4	44,278.4	306,796.8
Derivatives	-	424.0	-	424.0
Insurance Policies	-	-	5,211.6	5,211.6
AVCs	-	532.0	-	532.0
Cash and Cash Equivalents	13,706.8	-	-	13,706.8
Other Investment Balances	1,280.8	-	-	1,280.8
	<b>19,687.2</b>	<b>269,363.9</b>	<b>49,490.0</b>	<b>338,541.1</b>
<b>Investment Liabilities</b>				
Derivatives	-	(59.0)	-	(59.0)
Other Investment Balances	(444.5)	-	-	(444.5)
	<b>(444.5)</b>	<b>(59.0)</b>	-	<b>(503.5)</b>
<b>Total Investments</b>	<b>19,242.7</b>	<b>269,304.9</b>	<b>49,490.0</b>	<b>338,037.6</b>

## Notes to the Financial Statements (continued)

### 19. Investment Risks

#### Types of Risk Relating to Investments

FRS 102 requires the disclosure of information in relation to certain investment risks. These risks are set out by FRS 102 as follows:

**Credit Risk:** The risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation.

**Market Risk:** The risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk comprises three types of risk: currency risk, interest rate risk and other price risk.

- **Currency Risk:** This is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in foreign exchange rates.
- **Interest Rate Risk:** This is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in market interest rates.
- **Other Price Risk:** This is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in market prices (other than those arising from interest rate risk or currency risk), whether those changes are caused by factors specific to the individual financial instrument or its issuer, or factors affecting all similar financial instruments traded in the market.

## Notes to the Financial Statements (continued)

### 19. Investment Risks (continued)

In the following table, the risk noted affects the asset class [●] significantly, [◐] partially or [○] hardly / not at all.

	Credit Risk	Market Risk			2025	2024
		Currency Risk	Interest Rate Risk	Other Price Risk	£'000	£'000
Equities	○	◐	○	●	-	4,699.6
Bonds	●	◐	●	◐	5,425.0	5,889.5
Pooled Investment Vehicles:					287,446.0	306,796.8
Direct exposure	●	○	○	○		
Indirect exposure	◐	◐	◐	◐		
Derivatives	◐	◐	●	◐	(8.4)	365.0
Insurance Policies	◐	○	●	◐	8,904.6	5,211.6
AVC Investments	◐	◐	◐	◐	336.0	532.0
Cash and Other Investment Balances	●	◐	●	○	4,561.1	14,543.1
					<b>306,664.3</b>	<b>338,037.6</b>

### Investment Strategy

In the year under review, the Trustee's objective was to maintain a portfolio of suitable assets of appropriate liquidity which will generate investment returns sufficient to meet, together with future contributions, the benefits payable under the Rules as they fall due.

The Trust is a multi-employer pension scheme that provides tailored investment solutions for a number of underlying DB sections. Scheme level targets are set by the Trustee Funding Committee. When considering the investment strategy on a scheme-specific basis for each section of the Trust, the Funding Committee considers a number of factors such as the strength of the employer covenant, the long-term liabilities of the scheme, the appetite for investment risk and the funding strategy agreed with the employer(s). These are reviewed at least every three years in line with the scheme's valuation to ensure that the strategy remains appropriate.

## Notes to the Financial Statements (continued)

### 19. Investment Risks (continued)

The Trustee has delegated the implementation of the investment strategy to TPTIM (the fiduciary manager) which is governed through a Fiduciary Management Agreement with the Trustee and overseen by the Trustee's Investment Oversight Committee.

To achieve each scheme's specific investment objective TPTIM constructs a tailored investment strategy consisting of pools of assets. In doing so TPTIM considers a range of factors including, but not limited to, the expected risk and return of each asset class, diversification benefits, liquidity requirements and fees.

TPTIM employs third-party fund managers to implement the investment strategy, meaning that TPTIM does not manage any money in-house. TPTIM uses a combination of both passive and active investments depending on the perceived ability to add value in the relevant strategy or asset class. Fund managers are monitored on an ongoing basis by the TPTIM inhouse investment team with regularly reporting reviewed by the TPTIM Investment Committee. Fund managers are met with at least annually.

The Trust is subject to market risk, principally in relation to the growth assets which include equities, unlisted infrastructure, property, private credit and a range of strategies that aim to produce long term returns through capital appreciation. These investments are held through pooled funds or segregated accounts.

The Trustee manages this exposure to overall market risk movements by constructing a diversified portfolio of investments across various markets.

#### *Credit Risk*

The Trust is subject to credit risk because it invests in bonds, commercial property, over-the-counter ("OTC") derivatives, has cash equivalents and undertakes stock-lending activities. The Trust invests in pooled investment vehicles and is therefore directly exposed to credit risk in relation to the provider of the pooled investment vehicle and also indirectly exposed to credit risks arising on some of the financial instruments held by the pooled investment vehicles. Increasingly the Trust is investing in credit through segregated accounts where possible to retain ownership of the assets, and increase transparency and strategy flexibility. The Trust also uses short term credit facilities through its custodian to support the efficient portfolio management of capital calls.

A summary of exposures to credit risk is given in the following table. The notes below explain how this risk is managed and mitigated for the different asset classes.

**Notes to the Financial Statements (continued)**

**19. Investment Risks (continued)**

	<b>2025</b>	<b>2024</b>
	<b>£'000</b>	<b>£'000</b>
<b>Investments exposed to Credit Risk</b>		
Bonds	5,425.0	5,889.5
Pooled Investment Vehicles:		
Bond Funds (Direct and Indirect)	230,400.8	232,481.5
Other Funds (Direct Risk only)	57,045.2	74,315.3
Derivatives:		
Assets	8.5	424.0
Liabilities	(16.9)	(59.0)
Insurance Policies	8,904.6	5,211.6
AVC Investments	336.0	532.0
Cash and Other Investment Balances	4,561.1	14,543.1
	<b>306,664.3</b>	<b>333,338.0</b>

Credit risk arising on bonds held directly is mitigated by ensuring that the investment manager has a suitable due diligence framework in place for underwriting the creditworthiness of the counterparty and that the credit rating of the bonds matches the desired risk profile of the mandate. The Trustee considers financial instruments or counterparties to be of investment grade if they are rated by a recognised credit rating agency such as: BBB– or higher by S&P or Fitch or rated at Baa3 or higher by Moodys.

Direct credit risk arising from pooled investment vehicles is mitigated by the underlying assets of the pooled arrangements being ring-fenced from the pooled investment manager, the regulatory environments in which the pooled investment managers operate, diversification of pooled investments amongst a number of investment managers and moving assets where possible into segregated accounts. Indirect credit risk arises in relation to underlying investments held in a number of pooled investment vehicles and qualifying investment funds.

This risk is mitigated by ensuring that appropriate due diligence is carried out on the pooled manager's investment process at appointment and on an ongoing basis annually.

OTC derivative contracts are not guaranteed by any regulatory exchange and therefore the Trust is subject to the risk of failure of the counterparty. The credit risk for OTC contracts is reduced by collateral arrangements. Credit risk also arises on forward currency contracts where there are no collateral arrangements; however, all counterparties are required to be at least investment grade. Cash on deposit is held within financial institutions that have an investment grade credit rating.

## Notes to the Financial Statements (continued)

### 19. Investment Risks (continued)

A summary of pooled investment vehicles by type of arrangement is as follows:

	2025	2024
	£'000	£'000
<b>Legal nature of the pooled arrangements:</b>		
Exempt Unauthorised Unit Trust	161,716.5	-
Société d'investissement à capital variable (SICAV)*	96,622.2	52,792.6
Open ended investment company**	8,329.4	64,821.6
Partnerships	12,182.0	14,865.9
Unit linked insurance contracts	678.2	31,900.7
Authorised Contractual Scheme	7,917.7	-
Sole Investor Funds	-	142,416.0
	<b>287,446.0</b>	<b>306,796.8</b>

\*Included in SICAV are Irish Collective Asset-management Vehicles "ICAV".

\*\*Included in Open ended investment company are open ended managed property funds.

#### Currency Risk

The Trust is exposed to currency risk through investments denominated in foreign currencies. This risk is managed through the currency hedging policy, which seeks to reduce the volatility impact from foreign currency movements. Not all currency risk is hedged, due to it being a diversifying risk, part of the overall strategy or too costly to hedge. Currency hedging is implemented using forward contracts and managed by the custodian within the TPT In-house Funds or TPTIM directly.

The net currency exposure at the current and previous year ends was as follows:

			2025	2024
	Direct	Indirect	Net	Net
	Exposure	Exposure	Exposure	Exposure
	£'000	£'000	after	after
			Hedging	Hedging
			£'000	£'000
US Dollars (USD)	103.4	8,608.0	(8,286.0)	425.4
	<b>103.4</b>	<b>8,608.0</b>	<b>(8,286.0)</b>	<b>5,921.2</b>

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**Notes to the Financial Statements (continued)**

**19. Investment Risks (continued)**

*Interest Rate Risk*

The Trust is subject to interest rate risk because of investments held through pooled funds or segregated accounts holding investments including bonds, interest rate swaps, total return swaps, repos and cash.

A summary of exposures to interest rate risk is given in the following table:

	<b>2025</b>	<b>2024</b>
		<b>(restated)</b>
<b>Investments exposed to Interest Rate Risk</b>	<b>£'000</b>	<b>£'000</b>
Bonds	5,425.0	5,889.5
Pooled Investment Vehicles:		
Bond Funds (Direct and Indirect)	230,400.8	232,481.5
Derivatives:		
Assets	8.5	424.0
Liabilities	(16.9)	(59.0)
Insurance Policies	8,904.6	5,211.6
AVC Investments	336.0	532.0
Cash and Other Investment Balances	4,561.1	14,543.1
	<b>249,619.1</b>	<b>259,022.7</b>

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*Other Price Risk*

The Trust is subject to other price risk, principally in relation to the growth assets which include directly held equities, equities held through pooled or segregated vehicles, commercial property, unlisted infrastructure and a range of strategies that aim to produce absolute returns in all market environments. There is also more limited exposure to other price risk within the Matching-Plus Portfolio, principally in relation to the allocation to commercial property.

The Trustee manages this exposure to overall price movements by constructing a diverse portfolio of investments across various markets.

## Notes to the Financial Statements (continued)

### 19. Investment Risks (continued)

A summary of exposures to other price risk is given in the following table:

	<b>2025</b>	<b>2024</b>
	<b>£'000</b>	<b>£'000</b>
<b>Investments exposed to Other Price Risk</b>		
Equities	-	4,699.6
Bonds	5,425.0	5,889.5
Pooled Investment Vehicles:		
Other funds (Indirect)	57,045.2	74,315.3
Derivatives:		
Assets	8.5	424.0
Liabilities	(16.9)	(59.0)
AVC Investments	336.0	532.0
	<b>62,797.8</b>	<b>85,801.4</b>

### 20. Current Assets

	<b>2025</b>	<b>2024</b>
	<b>£'000</b>	<b>£'000</b>
Contributions due in respect of:		
Employers	314.3	552.9
Employees	11.2	13.1
Prepayments	-	61.3
Other debtors	24.2	1,382.1
Cash	1,184.9	1,240.6
	<b>1,534.6</b>	<b>3,250.0</b>

### 21. Current Liabilities

	<b>2025</b>	<b>2024</b>
	<b>£'000</b>	<b>£'000</b>
Tax Deducted from Pensions	236.2	203.4
Other Creditors	11.3	263.2
Accrued Expenses	291.7	1,132.5
	<b>539.2</b>	<b>1,599.1</b>

## Notes to the Financial Statements (continued)

### 22. Related-Party Transactions

#### Key management personnel

The Trustee, Verity Trustees Limited, is also the Trustee of The Pensions Trust. All of the Trustee Directors serve as Trustee Directors for each Trust. Fees and expenses of £0.5m (2024: £0.5m) were paid to the Trustee Directors and Co-opted Committee Member by The Pensions Trust.

#### The Pensions Trust

Administration of the Trust is undertaken by TPT RSL. The Pensions Trust's Expenses Reserve Account pays an administration charge to TPT RSL on behalf of the Trust.

The monthly management charge represents the amounts paid to The Pensions Trust in this respect. The Trust paid £1,246.3k (2024: £1,168.6k) to The Pensions Trust in this respect over the period 1 October 2024 to 31 August 2025. A further £113.3k is due in respect of September 2025 and is included in accrued expenses (2024: £114.8k). This was settled on 8 October 2025.

Fiduciary management services are provided to the Trust by TPTIM. The Pensions Trust's Expenses Reserve Account pays an administration charge to TPTIM on behalf of the Trust. The Trust paid £726.1k (2024: £639.0k) in the year to The Pensions Trust in this respect over the period 1 October 2024 to 31 August 2025. A further £63.1k is due in respect of September 2025 and is included in accrued expenses (2024: £62.9k). This was settled on 24 October 2025.

### 23. Employer-Related Investments

The Trust invests in various housing bonds, whose underlying borrowers are drawn from a pool of registered social landlords. The names of the actual borrowers are not disclosed and can vary over time. Waterloo Housing Association is the only registered social landlord which participates in the Trust which could be an Employer-Related Investment. The value of the Trust's holdings in these bonds at 30 September 2025 was £5,425.0k (2024: £5,889.5k (restated)).

Employer-Related Investments include contributions that were received later than the due date set out on the Schedules of Contributions. As at 30 September 2025, there were no (2024: £nil) late contributions outstanding. This represents less than 0.0% of net assets (2024: 0.0%).

### 24. Update on GMP Equalisation

Between 1978 and 2016, it was possible to contract out of part of the State Pension by being a member of an occupational pension scheme that met certain conditions. Where the scheme was contracted out, members and the employer paid a reduced rate of National Insurance to reflect the fact that the Scheme would provide benefits to replace some of the members' state pension rights. Between 1978 and 1997, contracted out defined benefit schemes were required to provide a Guaranteed Minimum Pension for each member. From 1997 to 2016 different rules applied.

## Notes to the Financial Statements (continued)

### 24. Update on GMP Equalisation (continued)

In October 2018, the High Court determined that benefits provided to members who had contracted out of their pension scheme must be assessed against the impact of the equalisation of state pension ages between May 1990 and April 1997 for both men and women. On 20 November 2020, the High Court issued a follow-on judgement in the Lloyds case and ruled that pension schemes will also need to revisit individual transfer payments made since 17 May 1990 to consider if any additional value is due as a result of GMP equalisation.

This issue affects each of the previously contracted out defined benefit schemes in the Trust. The Trustee has agreed to equalise GMP via the conversion methodology which is a one-off uplift (where required) for pensioner members and an assessment at future retirement for non-pensioners. Based on the work performed to date, the Trustee does not consider this to have a material impact in respect of historic payments.

### 25. Contingencies and Commitments

As at 30 September 2025, there were no contingent assets.

As at 30 September 2025, the Trust had the following contingent liability:

#### Virgin Media Case

The Trustee is aware of the Court of Appeal's judgment in the case of Virgin Media v NTL Pension Trustees II. This case was concerned with the validity of changes to certain pension scheme rules in a salary-related contracted out scheme made between 1997 and 2016. On 25 July 2024 the Court found that changes made without the necessary actuarial confirmation were invalid.

All the schemes in the Trust were established after 6 April 2016 so the Trust is not directly affected by this judgment. However, there is potential for liabilities which were transferred into the Trust to be affected. This will depend on the terms of the relevant transfer agreements and the rules of previous pension schemes so requires detailed further investigation. However, in September 2025, the Government proposed legislation as part of the Pension Schemes Bill which will enable trustees in certain circumstances to obtain actuarial confirmation retrospectively for changes to scheme rules which might otherwise have been invalid following the Virgin Media case (referred to below as the "remedial powers"). The Trustee will consider exercising the remedial powers where necessary when those powers come into force. Until it has been confirmed that the relevant actuarial certification can be given, it is not possible to estimate with any reliability whether there are any additional liabilities or, if there are, the quantum of those liabilities and any arrears (if any) that may be due to members, and any future rectification costs.

## Notes to the Financial Statements (continued)

### 25. Contingencies and Commitments (continued)

#### Commitments

The Trust does not have any formal commitments with the underlying assets in the funds held with Carne, however they are required to settle sub-fund liabilities should the fund manager issue a settlement notice.

At the year end, the outstanding commitments were:

	<b>2025 Committed (Local CCY)*</b>	<b>Outstanding at 30 Sept 25 (Local CCY)</b>	<b>2024 Committed (Local CCY)</b>	<b>Outstanding at 30 Sept 24 (Local CCY)</b>
Carne TPT Private Credit Fund	£2,700.1k	£491.7k	£3,708.2k	£1,432.4k
Carne TPT Real Assets Fund	\$3,213.8k	\$1,196.7k	\$2,178.7k	\$924.3k
Carne TPT Real Assets Fund	€1,618.2k	€113.5k	€1,096.9k	€196.6k
CBS Siguler Guff	\$14,000.0k	\$1,267.0k	\$14,000.0k	\$1,337.0k

\*£ (GBP), \$ (USD), € (EUR)

### 26. Subsequent Events

On 8 October 2025, TPT RSL incorporated TPT CDC Trustee Limited, a wholly owned subsidiary of TPT RSL.

On 14 October 2025, Frank Roberts & Sons Limited (“the company”) became insolvent and as a result the Frank Roberts & Sons Pension Scheme (“the scheme”) entered the Pension Protection Fund (“PPF”) assessment period. This assessment period is expected to take up to two years and the outcome of that assessment, including any future receipt of funds or transfer of members, is currently uncertain.

Pensions administration and payroll processes for the scheme are due to be moved away from TPT RSL to Broadstone Corporate Benefits Limited who will manage these functions throughout the PPF assessment period.

On 28 February 2026 the US and Israel carried out a joint strike on Iran, in the process killing the Supreme leader and a number of other key leadership figures. This led to retaliatory strikes across the Middle East, and led to a surge in oil prices given concerns about the ability to export oil via the Strait of Hormuz. This has contributed to increased market volatility. As the situation is fluid, an estimate of the precise financial effect on investment assets and liabilities is not possible at the date of approval of the financial statements. The Trustee will continue to monitor any impact on the Trust as the situation develops.

## **Independent auditors' statement about contributions to the Trustee of The Pensions Trust 2016**

### **Statement about contributions**

#### **Qualified opinion**

In our opinion, except for the matter described in the basis for qualified opinion paragraph below, the contributions required in accordance with the schedules of contributions certified by the Scheme actuary for the Trust year ended 30 September 2025 as reported in The Pensions Trust 2016's summary of contributions have, in all material respects, been paid in accordance with the schedules of contributions certified by the Trust actuary on the respective dates listed in the summary of contributions.

We have examined The Pensions Trust 2016's summary of contributions for the Trust year ended 30 September 2025 which is set out on pages 53 and 54.

#### **Basis for qualified opinion**

The summary of contributions discloses details of the late contributions which have led us to qualify our opinion.

Our examination involves obtaining evidence sufficient to give reasonable assurance that contributions reported in the summary of contributions have, in all material respects, been paid in accordance with the relevant requirements. This includes an examination, on a test basis, of evidence relevant to the amounts of contributions payable to the Trust under the schedules of contributions, and the timing of those payments.

### **Responsibilities for the statement about contributions**

#### **Responsibilities of the Trustee in respect of contributions**

As explained more fully in the statement of Trustee's responsibilities, the Trust's Trustee is responsible for preparing, and from time to time reviewing and if necessary revising, a schedule of contributions and for monitoring whether contributions are made to the Trust by employers in accordance with relevant requirements.

#### **Auditors' responsibilities in respect of the statement about contributions**

It is our responsibility to provide a statement about contributions and to report our opinion to you.

**Independent auditors' statement about contributions to the Trustee of The Pensions Trust  
2016 (continued)**

**Use of this report**

This report, including the opinion, has been prepared for and only for the Trustee as a body in accordance with section 41 of the Pensions Act 1995 and for no other purpose. We do not, in giving this opinion, accept or assume responsibility for any other purpose or to any other person to whom this report is shown or into whose hands it may come save where expressly agreed by our prior consent in writing.

*PricewaterhouseCoopers LLP*

PricewaterhouseCoopers LLP  
Chartered Accountants and Statutory Auditors  
Leeds  
1 April 2026

## Summary of Contributions

During the year ended 30 September 2025, the contributions required to be paid to the Trust were as follows:

	<b>2025</b>
	<b>£'000</b>
<b>Contributions required in accordance with the Schedules of Contributions certified by the Scheme Actuary</b>	
Employer deficit funding	5,131.6
Employer scheme expenses	1,057.6
Employer normal contributions	388.7
Employee normal contributions	119.6
<b>As reported on by the Trust's Auditors</b>	<b>6,697.5</b>
<b>Other contributions</b>	
Employer deficit funding	1,448.3
Employer scheme expenses	101.6
Employer normal contributions	970.4
Employer AVC contributions	9.5
Employee normal contributions	23.1
Employee AVC contributions	11.8
Reversal of employer deficit & employer scheme expenses*	(98.8)
<b>Total contributions not reported on by the Trust's Auditors</b>	<b>2,465.9</b>
<b>Total contributions as reported per the Fund Account</b>	<b>9,163.4</b>

\*Contributions in relation to Frank Roberts & Sons Pension Scheme ("Frank Roberts") were due at 30 September 2025. However, they have subsequently ceased to be payable, in line with the requirements of the Pensions Act 2004 upon Frank Roberts entering the PPF assessment period on 14 October 2025 ahead of the due date under their Schedule of Contributions.

During the year three employers (2024: one) remitted contributions later than the date set out in the Schedules of Contributions. In respect of the year ended 30 September 2025, there were three late payments (2024: nil), representing £200.9k contributions (2024: £nil).

**Employer One** – remitted contributions of £21.2k three days late due to an employer administrative error.

**Employer Two** – remitted contributions of £50.9k nine days late due to the planned closure of the contributions submission portal during the migration of the Trust's DC administrator.

**Employer Three** – remitted contributions of £128.8k 16 days late due to the planned closure of the contributions submission portal during the migration of the Trust's DC administrator.

### Summary of Contributions (continued)

The Schedules of Contributions in place during the year are as follows:

<b>Scheme</b>	<b>Date of Actuarial Certification of Schedule of Contributions</b>
Cambridge Building Society Retirement Plan	14/12/2023
Coventry Building Society Staff Superannuation Scheme	20/12/2023
Darlington Building Society Pension Plan	09/12/2022
Frank Roberts & Sons Pension Scheme	18/10/2022
Frank Roberts & Sons Pension Scheme	09/12/2024
Hinckley & Rugby Building Society Defined Benefit Pension Scheme	13/12/2023
Medicash Pension Fund	14/11/2023
National Counties Building Society Pension Scheme	17/12/2021
National Counties Building Society Pension Scheme	12/12/2024
Seabourne Pension Scheme	30/09/2021
Seabourne Pension Scheme	16/12/2024
Together Working for Wellbeing Pension Scheme	30/11/2022
Waterloo Housing Association Benefit Plan	23/09/2024

Contributions relating to periods before a Schedule of Contributions has been certified are included within other contributions and not reported on by the Auditors.

The Schedules of Contributions certified by the Scheme Actuary post year-end are as follows:

<b>Scheme</b>	<b>Date of Actuarial Certification of Schedule of Contributions</b>
Darlington Building Society Pension Plan	19/11/2025
Heywood and Partners Ltd Pension Ltd Pension	05/11/2025
Reading Transport Staff Retirement Scheme	12/12/2025
Together Working for Wellbeing Pension Scheme	16/12/2025

Approved by and signed for and on behalf of the Trustee on 1 April 2026.



**Joanna Matthews**  
Independent Chair  
Verity Trustees Limited

## Summary of Actuarial Certificates

The Pensions Trust is a multi-employer pension scheme, where the Scheme's Actuary has signed actuarial certificates. The following two statements have been given by the Actuary together with the signature and details of the Actuary.

### Statement 1

I certify that, in my opinion, the calculation of the scheme's technical provisions as at 30 September 202X is made in accordance with regulations under section 222 of the Pensions Act 2004. The calculation uses a method and assumptions determined by the Trustee of the scheme and set out in the Statement of Funding Principles dated (i.e. signed on behalf of the Trustee on) [Date].

### Statement 2

#### Adequacy of rates of contributions

1. I certify that, in my opinion, the rates of contributions shown in this Schedule of Contributions are such that –

the Statutory Funding Objective could have been expected on 30 September 202X to be met by the end of the period specified in the recovery plan dated (i.e. signed on behalf of the Trustee on) [Date].

#### Adherence to statement of funding principles

2. I hereby certify that, in my opinion, this Schedule of Contributions is consistent with the Statement of Funding Principles dated (i.e. signed on behalf of the Trustee on [Date]).

The certification of the adequacy of the rates of contributions for the purpose of securing that the Statutory Funding Objective can be expected to be met is not a certification of their adequacy for the purpose of securing the scheme's liabilities by the purchase of annuities, if the scheme were to be wound up.

The dates of the last triennial actuarial valuation and the dates of the Actuary's certification of that valuation for each pension scheme are listed below.

In interim years where no triennial actuarial valuation is required, an Actuarial Report is produced to provide an update on the funding position of the scheme. The date of the latest Actuarial Report for each scheme is detailed in the below table.

**Summary of Actuarial Certificates (continued)**

<b>Scheme</b>	<b>Most recent Valuation as at 30 September</b>	<b>Date of Certification of Schedule of Contributions</b>	<b>Date of Actuarial Report (annual update)*</b>
Cambridge Building Society Retirement Plan	2022	14 December 2023	30 September 2024
Coventry Building Society Staff Superannuation Scheme	2022	20 December 2023	30 September 2024
Darlington Building Society Pension Plan	2024	19 November 2025	N/A
Frank Roberts & Sons Pension Scheme	2023	09 December 2024	30 September 2024
Heywood and Partners Ltd Pension Scheme	2024	05 November 2025	N/A
Hinckley and Rugby Building Society Defined Benefit Pension Scheme	2022	13 December 2023	30 September 2024
Medicash Pension Fund	2022	14 November 2023	30 September 2024
National Counties Building Society Pension Scheme	2023	12 December 2024	30 September 2024
Reading Transport Staff Retirement Scheme	2024	12 December 2025	N/A
Seabourne Holdings Limited Retirement Benefits Scheme	2023	16 December 2024	30 September 2024
Together Working for Wellbeing Pension Scheme	2024	16 December 2025	N/A
Waterloo Housing Association Benefits Plan	2023	23 September 2024	30 September 2024

*\*This is the date of the annual update, if later than the triennial valuation.*

Copies of the above certificates are available on request from the address for enquiries on page 2.

## Appendix 1 - SIP Implementation Statement

### Implementation Statement for the Statement of Investment Principles (SIP) – The Pensions Trust 2016 (TPT 2016)

#### Introduction

This Implementation Statement relates to The Pensions Trust 2016 (TPT 2016) and has been prepared by Verity Trustees Limited (VTL), acting as Trustee of TPT 2016, covering the financial year from 1 October 2024 to 30 September 2025.

The purpose of this Statement is to:

- explain how, and the extent to which, the Trustee has followed the Statement of Investment Principles (SIP) during the reporting year;
- summarise any changes made to the SIP during the reporting period;
- provide an overview of voting and engagement activities carried out by, or on behalf of, the Trustee; and
- present evidence of how the Trustee has monitored the performance and stewardship activities of investment managers.

This Statement has been prepared in accordance with the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019 and the associated guidance published by The Pensions Regulator. It reflects VTL's commitment to transparency, responsible investment, and robust governance and stewardship practices, ensuring alignment with regulatory standards and the expectations of members.

## SIP updates and overview of investment strategy

### SIP reviews and amendments

The Trustee conducts annual reviews of the SIP. During the reporting period, the SIP was reviewed by the Investment Oversight Committee and subsequently approved by the Trustee Board on 14 October 2024. These reviews considered relevant regulatory developments, evolving industry best practice and the Trustee's ongoing assessment of investment, stewardship and environmental, social and governance (ESG)-related risks.

No material changes were made to the Trustee's overarching Investment Beliefs or Responsible Investment Principles and policies during the period. The SIP, therefore, continued to reflect the Trustee's long-term objectives, governance framework and approach to responsible investment.

Following the end of the reporting period, a further review of the SIP was undertaken in October 2025 (reviewed by the Investment Oversight Committee on 2 October 2025 and approved by the Trustee Board on 7 October 2025). This review introduced a revised structure, with content streamlined by referencing publicly available documents where appropriate rather than replicating substantial sections of other policy documents. No significant changes to investment strategy were made as part of this review.

### Investment strategy

TPT 2016 is a centralised occupational pension fund for non-associated employers. The assets of the Trust are held across multiple segregated schemes. The Trustee retains ultimate responsibility for setting the investment policy for the schemes. Responsibility for implementation is delegated to TPT Investment Management Limited (TPTIM), which is authorised and regulated by the Financial Conduct Authority.

TPTIM advises the Trustee on the design of investment strategy and the suitability of investments, and is responsible for the day-to-day management of scheme assets in accordance with the agreed strategy, guidelines and constraints. This includes the appointment, oversight and, where necessary, replacement of one or more investment managers, who are responsible for the day-to-day management of the underlying investments.

The Trustee's primary objective is to ensure that sufficient assets are available to meet members' benefits as they fall due. In support of this objective, the Trustee has set the following additional objectives:

- to target an expected return on scheme assets that is consistent with each scheme's agreed funding journey, while maintaining investment risk at an appropriate level; and
- to achieve full funding on a low-dependency basis, meaning that asset values are sufficient to meet liabilities valued on this basis. The Trustee recognises that there are a number of funding measures and gives due weight to those most relevant for each scheme.

TPTIM sets objectives for each underlying investment manager and monitors performance against those objectives on an ongoing basis.

When determining how to invest scheme assets, the Trustee obtains and considers advice from its advisers, principally TPTIM. This includes advice on the suitability and diversification of investments, ensuring that a range of asset classes and associated risks are considered. In doing so, the Trustee takes account of: each scheme's funding position and liability profile; the strength of the employer covenant; the Trustee's risk appetite and capacity for loss; expected contributions; cashflow requirements; and the agreed investment and funding objectives.

TPTIM allocates assets across three key portfolio components. By balancing exposure across these portfolios, TPTIM seeks to generate returns in excess of the schemes' liabilities while managing overall risk.

- **Growth Asset Portfolio (GAP):** seeks to deliver long-term capital growth through diversified exposure to public and private return-seeking assets. The portfolio includes both liquid and illiquid strategies to enhance risk-adjusted returns.
- **Matching-Plus Portfolio (MPP):** comprises contractual cashflow assets, including corporate bonds and secured income strategies, with a focus on high credit quality. These assets are generally lower risk and lower returning than those in the GAP and may also contribute to liability hedging.
- **Matching Portfolio (MP):** includes assets such as gilts and leveraged gilts (commonly referred to as Liability Driven Investment, or LDI) that closely match the characteristics of the liabilities. These assets are used to manage interest rate and inflation risks. TPTIM implements bespoke liability hedging strategies to improve hedge effectiveness and support risk management.

Investments are predominantly implemented through pooled funds. Some of these are structured as funds of funds managed by TPTIM and populated by underlying investment managers. Responsibility for the selection, monitoring and termination of these managers is delegated to TPTIM.

Where pooled fund structures limit the Trustee's direct influence over individual managers' investment practices, the Trustee expects TPTIM to engage with managers to ensure that investment, risk management and stewardship practices are maintained or improved where appropriate.

### Strategy changes during the reporting period

During the reporting period, the following strategy changes were made. While some of these changes relate to underlying investment managers appointed by TPTIM, they are included for transparency and reflect the fact that such developments are reported to and, as a significant investor, may be influenced by, the Trustee.

- Ninety One appointment to manage the Emerging Market Debt mandate was finalised in October 2024 following completion of investment, operational and legal due diligence.
- The Global Equity mandate managed by Ownership Capital was terminated in July 2025 following concerns relating to governance and performance. Assets were transitioned to the LGIM Climate Fund on an interim basis pending the appointment of a replacement manager.
- The rollout of the seven TPT funds originally planned was completed with the launch of the CG TPT Global Equity Fund in September 2025. The Trustee approved the launch of an open-ended property

fund to support the implementation of the investment strategy and the ability to scale the mandate to third-party trustees, with a target launch date in 2026.

- Within the real assets portfolio, a liquidity opportunity was utilised to realise a cash distribution from Meridiam Infrastructure Europe II. This supported a reduction in overweight positions within real assets and improved alignment with strategic asset allocation targets.
- Within the liquid alternatives allocation, a partial redemption was initiated from the King Street distressed credit mandate. This reflected a reassessment of the strategy's performance characteristics, correlation with other holdings and fit within the broader portfolio.
- Ortec Finance was appointed in September 2025 to support climate scenario analysis and enhance the assessment of long-term climate-related financial risks.

## Adherence to SIP policies

In the Trustee’s opinion, the SIP has been followed over the 2024-2025 reporting year.

The key points are outlined below.

**Table 1. Policy summary and evidence**

DB SIP section	Policy	Evidence
<b>2</b>	<b>Appointments and delegation</b>	
	<p><i>Summary:</i> The Trustee delegates the day-to-day management of investments to authorised managers, ensuring they possess the requisite knowledge and experience. These appointments are reviewed periodically to assess performance and adherence to the Trustee’s policies. If a manager fails to comply or provide satisfactory justification for underperformance, their appointment will be reconsidered. Details of the appointed managers are disclosed annually in the Trustee’s investment report within the Annual Report.</p>	<p>VTL delegates investment decisions to TPTIM. TPTIM, in turn, delegates day-to-day investment management to authorised investment managers. Managers are reviewed at least on an annual basis.</p> <p>Please see <i>Selecting and monitoring investment managers</i> (page 15).</p>
<b>3</b>	<b>Investment Beliefs</b>	
	<p><i>Summary:</i> The Trustee’s Investment Beliefs provide a guiding framework for decision-making. These beliefs are reviewed annually and published on TPT’s website.</p>	<p>Published beliefs on TPT’s website.</p> <p>For the period under review, the Investment Beliefs were reviewed on 14 October 2024.</p>

<b>4 &amp; 5</b>	<b>Investment strategies and investment return</b>	
	<p><i>Summary:</i> The Trustee’s investment strategy involves allocating assets between Growth, Matching-Plus and Liability Driven Investment (LDI) portfolios, balancing potential returns with associated risks. Strategy is tailored to each scheme’s liability and risk profile, financial strength of employers, and funding objectives. The strategy for each scheme is reviewed at least every three years to ensure it remains appropriate.</p>	<p>Performance reviews of the portfolios, documented triennial strategy reviews for individual schemes, and records of asset allocation decisions and outcomes.</p>
<b>6</b>	<b>Management and risk</b>	
	<p><i>Summary:</i> The risks, as stated in the SIP, are assessed and monitored regularly.</p>	<p>The SIP lists a number of risk factors that the Trustee believes may result in a failure to meet the agreed objectives. The Trustee monitors and manages these risk factors through measures specific to each risk.</p>
<b>7</b>	<b>Responsible investment (including ESG factors) and non-financial matters</b>	
	<p><i>Summary:</i> The Trustee is committed to being a responsible investor in line with its legal duties under the Investment Regulations. Responsible investment is an approach which seeks to integrate ESG considerations into investment management and ownership practices.</p>	<p>The Responsible Investment Framework outlines the policies that relate to the Trustee’s duties under the Investment Regulation, including its approach to voting, engagement and climate risk.</p> <p>For the period under review, the Responsible Investment Framework was reviewed on 14 October 2024.</p>

<b>7.2.7</b>	<b>Fund manager selection and monitoring</b>	
	<p><i>Summary:</i> The Trustee incorporates ESG expectations into the manager selection and ongoing monitoring processes, including operational due diligence and Investment Management Agreements tailored to specific mandates.</p>	<p>The Responsible Investment Framework details the Trustee’s approach to selecting and monitoring managers. Specific ESG and climate change expectations were considered when appointing new mandates and reviewing existing mandates.</p> <p>Please see <b><i>Selecting and monitoring investment managers</i></b> (page 15).</p>
<b>7.2.14</b>	<b>ESG factors</b>	
	<p><i>Summary:</i> ESG risks, including climate change, are actively considered within the Trustee’s investment process. This is supported by the Climate Change Policy and Responsible Investment Principles.</p>	<p>VTL’s Responsible Investment Framework outlines how the Trustee incorporates ESG considerations into investment decisions.</p> <p>The Climate Change Policy was updated on 14 October 2024.</p> <p>The Responsible Investment Principles were also reviewed on 14 October 2024.</p>
<b>7.3</b>	<b>Voting</b>	
	<p><i>Summary:</i> The Trustee delegates voting activities to managers. Managers are expected to exercise voting rights consistent with the Trustee’s Responsible Investment Framework and Pensions UK guidelines.</p>	<p>The Trustee’s voting policy is outlined in the Responsible Investment Framework, which is reviewed at least annually. Voting records are included in the Trustee’s Stewardship Report.</p> <p>For the period under review, the Responsible Investment Framework was reviewed on 14 October 2024.</p> <p>Please see <b><i>Stewardship summary</i></b> (page 10).</p>

<b>7.4</b>	<b>Engagement</b>	
	<p><i>Summary:</i> The Trustee’s engagement approach spans manager-led, joint, collaborative and direct engagements. Investment managers are tasked with engaging on material ESG issues.</p>	<p>The Trustee’s engagement policy is outlined in the Responsible Investment Framework, which is reviewed at least annually. Engagement highlights and case studies are included in the Trustee’s Stewardship Report.</p> <p>For the period under review, the Responsible Investment Framework was reviewed on 14 October 2024.</p> <p>Please see <i>Stewardship summary</i> (page 10).</p>
<b>7.5</b>	<b>Non-financial matters</b>	
	<p><i>Summary:</i> Non-financial factors, such as member ethical views, are considered within the Ethical Investment Framework.</p>	<p>VTL has an Ethical Investment Framework that was adopted following consultation with key member organisations.</p> <p>For the period under review, the Ethical Investment Framework was reviewed on 3 March 2025.</p>
<b>9</b>	<b>Compliance</b>	
	<p><i>Summary:</i> TPTIM is required to confirm compliance with the SIP principles, including diversification and suitability. The Trustee reviews the SIP annually or following significant policy changes and consults participating employers when adjustments are required.</p>	<p>Manager compliance confirmations and annual SIP review documents.</p> <p>For the period under review, the SIPs were reviewed on 14 October 2024.</p>

## Stewardship summary

The Trustee has established a set of Investment Beliefs that provide a clear framework for long-term decision-making and guide the development of the schemes' investment strategies. The Trustee considers that ESG risks and opportunities can be financially material and should be assessed over the appropriate investment time horizon. In particular, the Trustee recognises climate change as a key financial risk.

To support this approach, the Trustee has adopted a set of Responsible Investment Principles, which emphasise the importance of effective stewardship and the integration of ESG factors in protecting and enhancing long-term value. Together, the Investment Beliefs and Responsible Investment Principles underpin the Trustee's approach to investment strategy, manager oversight and stewardship. Both are reviewed annually and are publicly available on TPT's website.

## Voting policy

The Trustee delegates stewardship responsibilities, including voting, to its appointed investment partners. TPTIM does not typically exercise voting rights directly. Instead, voting is delegated to the underlying investment managers appointed to manage listed equity mandates, as these managers are considered best placed to make informed voting decisions based on their proximity to investee companies and understanding of the investment strategy.

- TPTIM is responsible for overseeing how voting rights are exercised by underlying investment managers. This oversight includes ensuring that:
  - managers' voting activity and records are reviewed on a regular basis;
  - voting decisions are aligned with the Trustee's Voting Guidelines and broader stewardship priorities;
  - significant or contentious votes are identified, reviewed and, where appropriate, escalated; and
  - any material divergence from policy expectations is investigated and addressed.

Investment managers are expected to vote in accordance with recognised governance standards, including the Pensions UK Corporate Governance Policy and Voting Guidelines, supported by the G20/OECD Corporate Governance Principles and the International Corporate Governance Network (ICGN) Global Governance Principles. For non-UK holdings, equivalent expectations apply in respect of transparency, board accountability and the protection of shareholder rights. The Trustee retains the right, where practicable, to provide direction on how votes should be cast, particularly in relation to priority stewardship issues. Where appropriate and proportionate, this may include recalling stock on loan or overriding manager discretion, subject to operational feasibility.

## Stock lending

The Trustee participates in a securities lending programme, which may, in certain circumstances, temporarily limit the ability to exercise voting rights on specific resolutions. Where a vote is considered contentious, material or strategically important, the Trustee may instruct that stock is recalled or that lending is restricted in order to facilitate voting. Such decisions are taken on a case-by-case basis, in consultation with the relevant investment manager, and with regard to proportionality and operational feasibility.

## stewardship across asset classes

While voting rights apply only to listed equities, the Trustee expects responsible investment practices and effective stewardship to be embedded across all asset classes, including fixed income, private credit and real assets.

The Trustee recognises that ESG integration and stewardship approaches vary by asset class and geography, and therefore applies a proportionate and differentiated set of expectations, including:

- **Equities (active and passive):** stewardship is assessed through managers' engagement activity, proxy voting behaviour and alignment with the Trustee's thematic priorities, such as climate change and biodiversity.
- **Fixed income:** managers are expected to consider issuer-level ESG risks, including transition risk, covenant strength and human rights-related controversies. ESG considerations are integrated into credit analysis and security selection.
- **Private credit:** ESG due diligence is expected at the point of investment and throughout the holding period. The Trustee seeks transparency regarding General Partners' ESG policies, governance arrangements and reporting practices.
- **Infrastructure and real estate:** managers are expected to demonstrate how climate resilience, tenant and occupant health and safety, and regulatory risks are managed. Stewardship includes influencing improvements in sustainability performance over time.

This differentiated approach supports the Trustee's objective of ensuring that stewardship and ESG integration remain financially material and relevant across different investment contexts.

## Reporting

Investment managers are required to provide voting data on a quarterly basis. This information is reviewed, and meetings are held where appropriate to assess alignment with the Trustee's stewardship priorities and approach to identifying significant votes.

Voting data for the reporting period is set out in the **Voting activity** section of this Statement. In addition, TPTIM publishes full voting records on TPT's website, supporting transparency and ongoing accountability.

## Engagement policy

As a long-term asset owner, the Trustee regards engagement as a key mechanism for promoting positive change and protecting the long-term value of scheme assets. Engagement is a core component of the Trustee's responsible investment approach and is used to influence issuers on financially material environmental, social and governance (ESG) issues.

Given the size and diversification of the portfolio, the Trustee adopts a multi-layered approach to engagement, primarily working through appointed investment managers while retaining oversight and the ability to escalate where necessary. The Trustee's engagement model comprises four complementary elements.

### 1. Engagement by investment managers

The Trustee delegates day-to-day engagement activity to its appointed investment managers, reflecting their direct access to company leadership, detailed understanding of investee companies and ability to maintain ongoing dialogue. Managers are expected to engage on ESG issues where these are material to the investment case or represent broader systemic risks, such as climate change or governance standards.

The Trustee expects all investment managers to:

- engage proactively with companies on key ESG issues;
- set clear and outcome-focused engagement objectives;
- monitor progress against those objectives;
- escalate engagement where progress is insufficient; and
- report regularly on engagement activity and outcomes.

Engagement activity is reviewed by the Trustee, via TPTIM, and is used to assess alignment with the Trustee's Responsible Investment Principles and stewardship expectations.

### 2. Joint engagement with investment managers

Where engagement priorities identified by the Trustee align with those of its investment managers, VTL may, through TPTIM, undertake joint engagement activities. The Trustee considers that engagement involving both an asset owner and an investment manager can add weight and credibility to discussions with investee companies and support more effective outcomes.

### 3. Collaborative engagement

The Trustee recognises the importance of collective action in addressing systemic risks and supporting improvements in market standards. Where practicable, and subject to available resources, TPTIM participates on behalf of VTL in collaborative engagements with other asset owners and industry bodies. These activities are aligned with the Trustee's Investment Beliefs and Responsible Investment Framework and enable the Trustee to amplify its voice on issues of systemic importance.

#### 4. Direct engagement

In certain circumstances, the Trustee may determine that direct engagement with a company is appropriate. In such cases, TPTIM undertakes targeted engagements on behalf of VTL to address specific ESG concerns and support meaningful progress. Direct engagement is typically reserved for matters of significant financial materiality, reputational risk or strategic importance to the portfolio. The Trustee retains oversight and is kept informed of engagement objectives, timelines and outcomes.

##### Reporting

Investment managers are required to provide engagement reporting on a quarterly basis. This includes:

- a description of the issue or theme;
- the engagement objective;
- the method and expected timeline;
- milestones or indicators of progress; and
- outcomes achieved or planned next steps.

This information is reviewed by TPTIM's responsible investment team and discussed with managers as part of regular monitoring meetings. The Trustee recognises that the quality, depth and format of engagement reporting varies across managers and asset classes. As adviser to the Trustee, TPTIM continues to work with managers to improve the clarity, consistency and outcome-focused engagement reporting, particularly in relation to the use of milestones and measurable outcomes.

Where engagement activity appears ineffective or misaligned with the Trustee's priorities, TPTIM may seek further clarification, escalate concerns or reassess the suitability of the mandate.

TPTIM's quarterly active ownership reviews summarise manager engagement activity and include selected case studies. These reports are shared with the Trustee and published on TPT's website, supporting transparency and accountability to members.

### UK Stewardship Code

VTL is a signatory to the Financial Reporting Council's UK Stewardship Code and publishes an annual Stewardship Report in accordance with the Code's requirements. The report includes voting statistics, examples of significant votes and engagement case studies, providing transparency on how stewardship responsibilities are discharged in practice.

The Stewardship Report is structured around the 12 Principles of the Code and sets out, on a principle-by-principle basis, how VTL meets the required standards, with a clear focus on stewardship activities and outcomes. It describes VTL's governance arrangements, culture, values and strategy, as well as its approach to risk management, conflicts of interest and the integration of ESG considerations.

### Stewardship priorities

The integration of stewardship and investment, including the management of material ESG issues, is supported by a range of governance processes and activities, including:

- asset allocation;
- manager selection and ongoing monitoring;
- risk management;
- active ownership;
- training and education; and
- advocacy.

Each year, the Trustee, supported by TPTIM, identifies a set of thematic stewardship priorities. These priorities are informed by assessments of financial materiality, exposure to investment risk and alignment with long-term outcomes for members and beneficiaries.

The agreed stewardship priorities are embedded within TPTIM's engagement plan and communicated to underlying investment managers. While managers are not required to adopt all priorities in full, the Trustee expects a degree of alignment in approach and focus. Any divergence is explored as part of the manager monitoring process and, where appropriate, challenged during formal review cycles.

During the reporting period, the Trustee's stewardship priorities focused on:

- **Climate change:** supporting alignment of portfolios with the goals of the Paris Agreement, including the objective of achieving net zero greenhouse gas emissions by 2050; and
- **Deforestation and nature-related risks:** encouraging companies to address nature-related dependencies and impacts, including the adoption of deforestation-free supply chains.

This approach supports the Trustee's objective of targeting stewardship activity where it is most likely to influence outcomes and protect long-term value.

## Selecting and monitoring investment managers

The Trustee has a fiduciary duty to ensure that all appointed investment managers act in the best interests of members and are aligned with the Trustee's Investment Beliefs, Responsible Investment Principles and stewardship priorities. To support this, the Trustee has established robust processes for the selection, appointment and ongoing monitoring of external investment managers.

The Trustee delegates investment oversight to TPTIM. TPTIM is accountable to the Trustee through regular reporting to the Investment Oversight Committee. In turn, TPTIM appoints and monitors underlying investment managers.

Investment managers are selected through a structured process that considers a range of qualitative and quantitative criteria, including investment philosophy, performance track record, team experience and stability, operational resilience, and, critically, their approach to ESG integration and stewardship. Managers are not appointed for a fixed term but are subject to ongoing review through formal monitoring processes.

Investment mandates include clear expectations in relation to ESG and climate-related risks. Where appropriate, these expectations are incorporated into Investment Management Agreements and are tailored to the relevant asset class, investment strategy (active or passive) and mandate structure.

### Manager selection process

Responsible investment considerations are embedded throughout the manager selection process. As part of due diligence, TPTIM assesses the extent to which ESG factors are integrated into a manager's investment process and the credibility of their stewardship approach. This assessment typically includes:

- evaluation of ESG policy frameworks and governance arrangements;
- assessment of voting and engagement strategies;
- review of climate-related disclosures and alignment with net zero or just transition frameworks, where relevant; and
- consideration of the resources and expertise dedicated to responsible investment.

Where a prospective manager does not meet the Trustee's minimum expectations, further due diligence may be undertaken, or the appointment may be deferred or declined.

### Monitoring and evaluation

Ongoing oversight of appointed managers is a central component of the Trustee's stewardship framework. TPTIM monitors managers on a regular basis to ensure that both financial and non-financial performance remains aligned with the Trustee's objectives. This includes:

- quarterly reporting on investment performance, ESG risk exposures and stewardship activity;
- annual assessments of managers' responsible investment capabilities, using a defined scoring framework with ratings applied across multiple dimensions; and
- thematic deep-dives into key issues, such as climate risk management and engagement outcomes.

Where issues are identified – for example, weak stewardship reporting, voting misalignment or gaps in ESG policies – TPTIM engages directly with managers to seek clarification or improvement. These discussions are documented and escalated where appropriate. Persistent failure to meet the Trustee’s expectations may result in further action, including reassessment of the mandate.

### **Selecting and monitoring service providers**

The Trustee applies similar due diligence and monitoring processes to key service providers, with oversight calibrated to the importance and risk profile of the service provided. For example, the Trustee’s custodian, Northern Trust, is subject to a comprehensive oversight framework, including regular operational calls, periodic performance reporting, formal service level agreements and attestation processes, and structured review and feedback mechanisms.

Oversight covers both risk management considerations (such as controls and compliance) and service quality factors (including timeliness, accuracy and responsiveness). Where issues arise, these are escalated appropriately and addressed through constructive engagement. All service providers are expected to operate transparently and in line with the Trustee’s standards of governance, integrity and responsible investment.

## How policies have been followed

The Trustee implements its voting and engagement policies through the delegation of stewardship responsibilities to its investment managers. Managers are expected to exercise voting rights and engage with investee companies in accordance with the Trustee's Responsible Investment Framework and the policies set out in the SIP.

### Voting

Investment managers are expected to vote in a manner that supports long-term value creation and reflects the Trustee's commitment to high standards of corporate governance. Key voting priorities include:

- promoting transparency and accountability in governance arrangements;
- supporting robust climate and ESG disclosures in line with recognised frameworks;
- encouraging companies to adopt credible net-zero strategies; and
- opposing practices that are misaligned with shareholder or stakeholder interests, such as excessive executive remuneration.

Voting outcomes are monitored through detailed quarterly reporting from investment managers, including information on significant votes and the rationale for voting decisions. A summary of key voting activity is set out in the **Voting activity** section of this Statement.

### Engagement

Engagement is a core element of the Trustee's stewardship approach. Investment managers are expected to engage with investee companies on a range of material ESG issues, including:

- climate change and net-zero alignment;
- board composition, diversity and governance practices;
- human capital management and supply chain risks; and
- biodiversity and nature-related risks.

Managers are expected to prioritise engagements that address systemic risks or issues with the potential to affect long-term financial performance. Engagement reporting includes information on objectives, progress and outcomes.

### Monitoring and oversight

The Trustee, through TPTIM, monitors the application of voting and engagement policies through:

- regular review of stewardship reports detailing voting records, significant engagements and progress against ESG objectives;
- annual assessments of managers' Responsible Investment Ratings, including evaluation of voting and engagement practices; and
- periodic deep-dive discussions to challenge managers' approaches and test alignment with the Trustee's expectations.

Where concerns arise, TPTIM engages with managers to seek improvement. Continued underperformance against stewardship expectations may lead to reconsideration of the manager's appointment.

#### **Outcomes and continuous improvement**

The Trustee seeks to achieve tangible outcomes from its stewardship activities, including improved corporate disclosures, more sustainable business practices and demonstrable progress against climate-related targets. The Trustee reviews its voting and engagement policies annually to ensure they remain effective, proportionate and aligned with evolving regulatory expectations and best practice.

## Voting statistics

Investment Manager	L&G Asset Management							
Fund	FTSE4Good UK Equity Index	FTSE4Good Developed Equity Index Fund	Low Carbon Transition UK Equity Index*	Low Carbon Transition North America Equity Index*	Low Carbon Transition Europe (ex UK) Equity Index*	Low Carbon Transition Asia Pacific (ex Japan) Equity Index*	Low Carbon Transition Japan Equity Index*	TPT GLOBAL IDX EQ(LOW CARB) FD**
How many meetings were you eligible to vote at?	259	1198	90	519	440	149	288	5
How many resolutions were you eligible to vote on?	4543	16784	1850	6841	7414	1140	3563	57
What % of resolutions did you vote on for which you were eligible?	100.00%	99.87%	100.00%	99.69%	100.00%	100.00%	100.00%	100.00%
Of the resolutions on which you voted, what % did you vote with management?	94.12%	81.85%	96.43%	58.84%	82.14%	80.44%	92.34%	84.21%
Of the resolutions on which you voted, what % did you vote against management?	5.88%	17.83%	3.57%	40.38%	17.39%	19.56%	7.66%	15.79%
Of the resolutions on which you voted, what % did you vote to abstain?	0.00%	0.32%	0.00%	0.78%	0.47%	0.00%	0.00%	0.00%
In what % of meetings, for which you did vote, did you vote at least once against management?	42.86%	72.54%	35.56%	98.07%	77.50%	71.14%	52.08%	80.00%
Which proxy advisory services does your firm use?	ISS	ISS	ISS	ISS	ISS	ISS	ISS	ISS
Do you use their standard voting policy or created your own bespoke policy which they then implemented on your behalf?	Bespoke Policy	Bespoke Policy	Bespoke Policy	Bespoke Policy	Bespoke Policy	Bespoke Policy	Bespoke Policy	Bespoke Policy
What % of resolutions, on which you did vote, did you vote contrary to the recommendation of your proxy adviser? (if applicable)	4.89%	14.04%	3.46%	37.04%	8.48%	12.81%	6.71%	15.79%

The Pensions Trust 2016  
Year ended 30 September 2025

Investment Manager	Man Group	Ownership Capital	RBC Global Asset Management			Ruffer LLP		Sands Capital Management	
			Man Risk Premia SPC***	Long-Horizon Equity	Emerging Markets Equity SRI	Emerging Markets Equity ex-China	China Equity	Ruffer Absolute Return SRI	Ruffer Absolute Return
Fund									
How many meetings were you eligible to vote at?	511	25	70	69	55	105	122	46	
How many resolutions were you eligible to vote on?	6207	358	763	683	585	1466	1796	486	
What % of resolutions did you vote on for which you were eligible?	31.61%	100.00%	100.00%	100.00%	95.21%	100.00%	98.70%	100.00%	
Of the resolutions on which you voted, what % did you vote with management?	89.23%	89.00%	95.15%	94.44%	87.97%	97.14%	98.02%	97.74%	
Of the resolutions on which you voted, what % did you vote against management?	10.51%	11.00%	4.85%	5.56%	12.03%	2.80%	1.88%	2.05%	
Of the resolutions on which you voted, what % did you vote to abstain?	0.00%	1.00%	0.00%	0.00%	0.00%	0.07%	0.06%	0.21%	
In what % of meetings, for which you did vote, did you vote at least once against management?	57.59%	80.00%	30.00%	31.88%	47.27%	21.90%	19.67%	19.57%	
Which proxy advisory services does your firm use?	Glass Lewis	ISS	ISS, Glass Lewis	ISS, Glass Lewis	ISS, Glass Lewis	ISS	ISS	ISS, Glass Lewis	
Do you use their standard voting policy or created your own bespoke policy which they then implemented on your behalf?	Bespoke Policy	Bespoke Policy	Bespoke Policy	Bespoke Policy	Bespoke Policy	Bespoke Policy	Bespoke Policy	Standard Policy	
What % of resolutions, on which you did vote, did you vote contrary to the recommendation of your proxy adviser? (if applicable)	4.65%	6.00%	1.70%	2.05%	0.00%	3.00%	3.00%	9.05%	

TPTIM divested from these strategies on 23 September.

\*\* TPTIM invested in this strategy on 23 September.

\*\*\* Due to an operational account configuration error at the investment manager, the number of votes recorded for this mandate was reduced between October 2024 and September 2025. Appropriate remedial actions have since been implemented, including strengthened controls and oversight, to prevent recurrence.

## Significant votes

<b>Investment manager</b>	<b>L&amp;G Asset Management</b>
Company name	Microsoft Corporation
Date of vote	10 December 2024
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	6.01%
Summary of the resolution	Report on AI Data Sourcing Accountability
How you voted	For
Where you voted against management, did you communicate your intent to the company ahead of the vote?	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to the AGM.
Rationale for the voting decision	The company is exposed to growing legal and reputational risks related to copyright infringement in its data sourcing practices. Although Microsoft has robust disclosures regarding responsible AI and associated risks, L&G believes shareholders would benefit from enhanced transparency on how third-party data is used to train its large language models.
Outcome of the vote	Failed
Implications of the outcome	L&G will continue its engagement efforts, advocating for improved disclosure and stronger commitments on AI governance and data ethics.
On which criteria have you assessed this vote to be "most significant"?	Shareholder proposal.

The Pensions Trust 2016  
Year ended 30 September 2025

<b>Investment manager</b>	<b>L&amp;G Asset Management</b>
Company name	Deere & Company
Date of vote	26 February 2025
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	0.26%
Summary of the resolution	Report on a Civil Rights Audit
How you voted	For
Where you voted against management, did you communicate your intent to the company ahead of the vote?	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to the AGM.
Rationale for the voting decision	A vote in favour was applied as the audit represents a transparent mechanism for assessing whether the company's code of conduct is functioning effectively and without gender or ethnicity-based discrimination. This supports the mitigation of potential legal or financial risks.
Outcome of the vote	Failed
Implications of the outcome	L&G will continue to engage with the company, advocate publicly for improved practices, and monitor both company-level and broader market progress on civil rights.
On which criteria have you assessed this vote to be "most significant"?	Shareholder proposal.

The Pensions Trust 2016  
Year ended 30 September 2025

<b>Investment manager</b>	<b>L&amp;G Asset Management</b>
Company name	Marks & Spencer Group Plc
Date of vote	1 July 2025
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	0.26%
Summary of the resolution	Oversee the Preparation of a Report to Provide Investors the Information Needed to Assess the Company's Approach to Human Capital Management
How you voted	For
Where you voted against management, did you communicate your intent to the company ahead of the vote?	L&G publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with investee companies in the three weeks prior to the AGM.
Rationale for the voting decision	L&G acknowledges Marks & Spencer's commitment to paying all employees a real living wage. However, disclosure of employee turnover rates, at least for full-time workers, would provide greater insight into the impact of this approach on staff retention. In addition, while the UK is generally considered a low-risk jurisdiction for human rights abuses, L&G believes that improved transparency regarding third-party contractors operating on M&S premises would help mitigate potential future human rights risks.
Outcome of the vote	Failed
Implications of the outcome	L&G will continue to engage with Marks & Spencer and other investee companies on this issue, publicly advocate its position, and monitor company- and market-level progress.
On which criteria have you assessed this vote to be "most significant"?	Shareholder proposal.

The Pensions Trust 2016  
Year ended 30 September 2025

<b>Investment manager</b>	<b>Ownership Capital</b>
Company name	L'Oreal
Date of vote	29 April 2025
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	5.00%
Summary of the resolution	2025 Remuneration Policy (CEO)
How you voted	Against
Where you voted against management, did you communicate your intent to the company ahead of the vote?	No
Rationale for the voting decision	Ownership Capital voted against the remuneration policy due to insufficient transparency around payout scales, unjustified increases in pay caps, and concerns regarding potentially excessive termination benefits that are not subject to performance conditions. Taken together, these elements were not considered to be adequately aligned with long-term shareholder interests.
Outcome of the vote	Passed
Implications of the outcome	Ownership Capital will continue to engage with the board to encourage stronger alignment between executive pay outcomes and long-term performance.
On which criteria have you assessed this vote to be "most significant"?	Vote against management recommendation.

The Pensions Trust 2016  
Year ended 30 September 2025

<b>Investment manager</b>	<b>Sands Capital</b>
Company name	Titan Company Limited
Date of vote	22 July 2025
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	2.40%
Summary of the resolution	Re-elect Mariam Pallavi Baldev as Director
How you voted	Against
Where you voted against management, did you communicate your intent to the company ahead of the vote?	No
Rationale for the voting decision	Mariam Pallavi Baldev did not attend at least 75% of board meetings during the relevant period. This attendance record was considered insufficient and led Sands Capital to vote against her re-election.
Outcome of the vote	Passed
Implications of the outcome	None
On which criteria have you assessed this vote to be "most significant"?	Vote against management recommendation.

The Pensions Trust 2016  
Year ended 30 September 2025

<b>Investment manager</b>	<b>RBC BlueBay Asset Management</b>
Company name	Raia Drogasil SA
Date of vote	6 November 2024
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	2.12%
Summary of the resolution	Amendment to the Restricted Stock Plan
How you voted	Against
Where you voted against management, did you communicate your intent to the company ahead of the vote?	No
Rationale for the voting decision	RBC voted against the proposed amendment on the basis that the overall terms of the plan did not sufficiently align the interests of plan beneficiaries with those of shareholders.
Outcome of the vote	Passed
Implications of the outcome	RBC will continue to monitor the company and may consider engagement if deemed necessary.
On which criteria have you assessed this vote to be "most significant"?	Impact on shareholder value and rights.

The Pensions Trust 2016  
Year ended 30 September 2025

<b>Investment manager</b>	<b>Man Group</b>
Company name	Dollarama Inc.
Date of vote	11 June 2025
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	Not available
Summary of the resolution	Shareholder Proposal Regarding Waste Reduction Policy
How you voted	For
Where you voted against management, did you communicate your intent to the company ahead of the vote?	No
Rationale for the voting decision	Man Group voted in favour of the shareholder proposal, which sought to strengthen the company's waste reduction policy through enhanced environmental accountability and disclosure. The proposal was considered consistent with Man Group's broader support for initiatives that promote positive environmental and social outcomes.
Outcome of the vote	Failed
Implications of the outcome	Man Group places strong emphasis on the role of shareholder proposals as part of its stewardship responsibilities. In line with its Custom Proxy Voting Policy, the firm is supportive of proposals that encourage improved environmental and social performance. Man Group considers active voting – particularly in support of well-constructed shareholder proposals – an important mechanism for influencing company behaviour and advancing responsible investment principles.
On which criteria have you assessed this vote to be "most significant"?	Shareholder proposal.

The Pensions Trust 2016  
Year ended 30 September 2025

<b>Investment manager</b>	<b>Ruffer LLP</b>
Company name	PulteGroup
Date of vote	30 April 2025
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	Not available
Summary of the resolution	Adopt GHG Emissions Reduction Targets Aligned with the Paris Agreement Goal
How you voted	For
Where you voted against management, did you communicate your intent to the company ahead of the vote?	No
Rationale for the voting decision	Ruffer believes that industry-leading companies should advance the management of climate risk by setting explicit, science-based emissions targets supported by key performance indicators, internal carbon pricing, and appropriate incentives. Ruffer considered this proposal a valuable opportunity for the company to demonstrate climate leadership and strengthen its long-term strategy.
Outcome of the vote	Failed
Implications of the outcome	Ruffer will continue to monitor PulteGroup's progress and may seek further engagement if limited action is observed.
On which criteria have you assessed this vote to be "most significant"?	Shareholder proposal.

## Voting policy analysis

Investment manager	L&G Asset Management
What is your policy on consulting with clients before voting?	L&G Asset Management’s voting and engagement activities are led by dedicated ESG professionals, with the objective of achieving the best outcomes for clients. Voting policies are reviewed annually and incorporate client feedback. Each year, L&G convenes a stakeholder roundtable through which clients and a broad range of stakeholders – including civil society, academia, the private sector, and investors – provide input that helps inform voting and engagement priorities. Additional feedback is gathered through regular client meetings and ad hoc enquiries.
Please provide an overview of your process for deciding how to vote.	All voting decisions are made by L&G’s Investment Stewardship team in accordance with its Corporate Governance & Responsible Investment and Conflicts of Interest policies, which are reviewed annually. Team members are assigned responsibility for specific sectors on a global basis, ensuring close alignment between voting decisions and ongoing engagement activities. This integrated approach supports consistent and informed messaging to investee companies.
How, if at all, have you made use of proxy voting services?	L&G uses ISS’s <i>ProxyExchange</i> platform to execute votes electronically on behalf of clients. All voting decisions remain with L&G, and no strategic voting decisions are outsourced. ISS research is used to complement L&G’s proprietary analysis, and for UK-listed companies, reports from Institutional Voting Information Services (IVIS) provide additional insights. L&G operates a global custom voting policy with minimum best-practice standards, while retaining discretion to override votes based on direct engagement with companies. Voting activity is monitored through a combination of manual checks and electronic alerts to ensure votes are cast in line with L&G’s policies and instructions.
What process did you follow for determining the “most significant” votes?	Most significant votes are identified using a range of criteria, including high-profile or controversial votes that attract client or public scrutiny; votes reflecting strong client interest, whether expressed directly or through L&G’s stakeholder roundtable; sanction votes following direct or collaborative engagement; and votes linked to L&G’s five-year ESG priority engagement themes.
Did any of your “most significant” votes breach the client’s voting policy (where relevant)?	No breaches were reported.
If ‘Y’ to the above. Please explain where this happened and the rationale for the action taken.	Not applicable.

The Pensions Trust 2016  
Year ended 30 September 2025

Are you currently affected by any conflicts across any of your holdings?	For information on conflicts of interest, refer to L&G's Investment Stewardship Conflict of Interest document <a href="#">here</a> .
Voting policy	<a href="#">Available here</a>

Investment manager	Man Group
What is your policy on consulting with clients before voting?	Man Group’s stewardship team seeks to meet client requirements wherever possible. Upon request, clients may override Man Group’s house voting policy and provide alternative voting instructions, for example where a client retains voting rights within a separately managed account.
Please provide an overview of your process for deciding how to vote.	Man Group applies a custom voting policy designed to promote strong corporate governance and robust ESG standards, while taking account of company-specific circumstances and local market practices. Recognising that governance standards and best practices vary across jurisdictions, Man Group adopts a balanced, research-led approach to voting. The firm aims to vote at all shareholder meetings where legally permitted, in accordance with its custom voting policy.
How, if at all, have you made use of proxy voting services?	Man Group appoints Glass Lewis as its proxy voting service provider and uses the Viewpoint platform for electronic vote execution, access to research reports, and the delivery of custom voting recommendations. All voting decisions remain the responsibility of Man Group.
What process did you follow for determining the “most significant” votes?	Man Group identifies “high-value meetings” within its proxy voting framework by considering a range of factors, including ESG ratings from third-party providers, internal “issuers of interest” watchlists, internal metrics assessing meeting importance (such as the percentage of shares held and fund assets under management), and the presence of shareholder proposals, which are automatically flagged for review.
Did any of your “most significant” votes breach the client’s voting policy (where relevant)?	No breaches were reported.
If ‘Y’ to the above. Please explain where this happened and the rationale for the action taken.	Not applicable.
Are you currently affected by any conflicts across any of your holdings?	Man Group maintains a Proxy Watch List of issuers where material conflicts of interest may arise. For these issuers, voting decisions are made in line with the custom voting policy unless otherwise determined by the Stewardship Committee. Final decisions on proxy matters require a majority vote of committee members. No other conflicts were reported.
Voting policy	<a href="#">Available here</a>

Investment manager	Ownership Capital
What is your policy on consulting with clients before voting?	Ownership Capital views voting as a core engagement tool and typically exercises voting rights in accordance with its internal guidelines to ensure consistency and reduce the risk of errors. However, the firm is open to discussing voting decisions with clients upon request.
Please provide an overview of your process for deciding how to vote.	Voting decisions are made by the investment team based on corporate governance best practice and a detailed understanding of each company's business, informed by ongoing dialogue with management. A designated team member gathers voting recommendations, reviews them against Ownership Capital's internal voting policy for consistency, and checks alignment with previous voting decisions. Once approved, voting instructions are submitted via the proxy voting platform.
How, if at all, have you made use of proxy voting services?	Ownership Capital uses the ISS platform for vote execution and reporting. All voting decisions remain with the investment team.
What process did you follow for determining the "most significant" votes?	Most significant votes are assessed on a case-by-case basis by the investment team, taking into account internal voting policies and the potential impact of each voting decision.
Did any of your "most significant" votes breach the client's voting policy (where relevant)?	No breaches were reported.
If 'Y' to the above. Please explain where this happened and the rationale for the action taken.	Not applicable.
Are you currently affected by any conflicts across any of your holdings?	No.
Voting policy	<a href="#">Available here</a>

Investment manager	RBC Global Asset Management
What is your policy on consulting with clients before voting?	RBC makes independent voting decisions, with full responsibility for voting outcomes resting with the firm. To ensure that voting activity is aligned with clients' best interests, the Responsible Investment team reviews each proposal to confirm that proxy adviser recommendations are consistent with RBC's voting guidelines.
Please provide an overview of your process for deciding how to vote.	RBC's voting decisions are governed by its Proxy Voting Guidelines, which are informed by internal expertise and independent research. The Guidelines are reviewed and updated on an ongoing basis to reflect evolving corporate governance best practice and are publicly available to provide transparency to clients and issuers. While votes are generally cast in line with these Guidelines, RBC may determine that an alternative vote or abstention is appropriate where this is considered to be in clients' best interests. In situations involving actual or perceived conflicts of interest, specific procedures are followed to ensure voting decisions remain consistent with the Guidelines and portfolio objectives.
How, if at all, have you made use of proxy voting services?	RBC engages ISS to provide proxy research and custom voting recommendations aligned with its Proxy Voting Guidelines. All voting decisions remain the responsibility of RBC. In addition, Glass Lewis & Co. is retained as a supplementary source of proxy research.
What process did you follow for determining the "most significant" votes?	Most significant votes are identified based on a range of factors, including votes cast against management recommendations, long-standing or ongoing engagement with issuers, votes relating to RBC's largest holdings, votes aligned with core engagement priorities, and non-routine matters with the potential to materially affect shareholder rights or corporate governance.
Did any of your "most significant" votes breach the client's voting policy (where relevant)?	No breaches were reported.
If 'Y' to the above. Please explain where this happened and the rationale for the action taken.	Not applicable.
Are you currently affected by any conflicts across any of your holdings?	No.
Voting policy	<a href="#">Available here</a>

<b>Investment manager</b>	<b>Ruffer LLP</b>
What is your policy on consulting with clients before voting?	As a discretionary investment manager, Ruffer does not operate a formal policy for consulting clients ahead of voting. However, where feasible, Ruffer can accommodate client-specific voting instructions in relation to particular companies or areas of concern.
Please provide an overview of your process for deciding how to vote.	Voting decisions are made in accordance with Ruffer’s Responsible Investment Policy.
How, if at all, have you made use of proxy voting services?	Ruffer appoints ISS as its proxy voting adviser. While Ruffer has developed its own internal voting guidelines, ISS research and analysis are used to support the assessment of resolutions and to identify potentially contentious issues. Stewardship responsibilities are not delegated or outsourced. Each resolution is reviewed on a case-by-case basis by the relevant research analyst, supported by the responsible investment team, drawing on their detailed understanding of the company. For contentious or high-profile resolutions, discussions are held with senior investment staff and, where consensus cannot be reached, decisions may be escalated to the Head of Research or the Chief Investment Officer.
What process did you follow for determining the “most significant” votes?	Ruffer defines most significant votes as those involving votes cast against management or against ISS recommendations, votes that breach Ruffer’s internal voting guidelines, shareholder resolutions, climate-related resolutions (including management-proposed climate resolutions), and dissident shareholder slates in the US market.
Did any of your “most significant” votes breach the client’s voting policy (where relevant)?	No breaches were reported.
If ‘Y’ to the above. Please explain where this happened and the rationale for the action taken.	Not applicable.
Are you currently affected by any conflicts across any of your holdings?	No.
Voting policy	<a href="#">Available here</a>

Investment manager	Sands Capital Management
What is your policy on consulting with clients before voting?	Sands Capital does not operate a formal policy for consulting clients ahead of voting. However, the firm undertakes detailed research and engagement to ensure that voting decisions are consistent with its investment philosophy and fiduciary obligations.
Please provide an overview of your process for deciding how to vote.	Voting decisions are made by Sands Capital’s investment research team, with primary responsibility resting with the lead analyst covering the company. Decisions are informed by a review of company proxy materials, internal research and analysis, prior engagement with company management, and third-party research from proxy advisers, including ISS and Glass Lewis. While external research is considered, Sands does not delegate voting authority and retains full responsibility for all voting decisions.
How, if at all, have you made use of proxy voting services?	Sands Capital votes proxies directly and uses research and recommendations from ISS and Glass Lewis to supplement its internal analysis.
What process did you follow for determining the “most significant” votes?	The significance of votes is assessed by Sands Capital based on factors such as the level of shareholder dissent, support for shareholder proposals, instances of voting against management or proxy adviser recommendations, historical voting patterns on similar resolutions, and the strategic relevance of the vote to the firm’s investment approach.
Did any of your “most significant” votes breach the client’s voting policy (where relevant)?	No breaches were reported.
If ‘Y’ to the above. Please explain where this happened and the rationale for the action taken.	Not applicable.
Are you currently affected by any conflicts across any of your holdings?	No.
Voting policy	<a href="#">Available here</a>