

BSS Group Pension Scheme

Implementation Statement for the year ended 30 September 2025

Purpose

This Implementation statement provides information on how, and the extent to which, the Trustee of the BSS Group Pension Scheme ("the Scheme") has followed their policy in relation to the exercising of rights (including voting rights) attached to the Scheme's investments, and engagement activities have been followed during the year ended 30 September 2025 ("the reporting year"). In addition, the statement provides a summary of the voting behaviour and most significant votes cast during the reporting year.

Latest review of the Statement of Investment Principles

The latest version of the Scheme's SIP came into effect in August 2023 and was applicable during the reporting year.

Manager selection exercises

One of the main ways in which the Trustees' policies are expressed is via Investment Manager selection exercises. In particular, the Trustees seek advice from the Investment Consultant ("XPS") on the extent to which their views on ESG and climate change risks may be taken into account in any future investment manager selection exercises.

There have been no manager selection exercises undertaken during the reporting period.

Ongoing governance

The Trustee, with the assistance of XPS, monitor the processes and operational behaviour of the investment managers from time to time, to ensure they remain appropriate and in line with the Trustees' requirements as set out in this statement.

The Trustee believes that there can be financially material risks relating to ESG issues. The Trustee has delegated the ongoing monitoring and management of ESG risks and those related to climate change to the Scheme's Investment Managers. The Trustee requires the Scheme's Investment Managers to take ESG and climate change risks into consideration within their decision-making, recognising that how they do this will be dependent on factors including the characteristics of the asset classes in which they invest. The Trustees receive quarterly carbon analysis, Net Zero alignment, ESG and climate risk attributes reporting provided by Insight Investment and Royal London Asset Management.

In order to ensure sufficient oversight of the engagement and voting practices of its managers, the Trustee may periodically meet with its Investment Managers to discuss engagement which has taken place. The Trustee will also expect its investment adviser to engage with the managers from time to time as needed and report back to the Trustee on the stewardship credentials of its managers. The Trustee will then discuss the findings with the investment adviser, in the context of their own preferences, where relevant. This will include considering whether the manager is a signatory to the UK Stewardship Code. The Trustee recognises the Code as an indication of a manager's compliance with best practice stewardship standards.

How the SIP has been followed during the year

The Trustee has various investment policies for the Scheme on the topics listed in the tables below; the tables also provide commentary on how and the extent to which the various policies were followed during the reporting year.

Policy	How the policy was followed
Scheme governance The Trustee's policy is to be accountable for the investment of the Scheme's assets and has the responsibility to manage the Scheme's affairs effectively. The Trustee decides what to delegate after considering whether they have the necessary skills, knowledge, and professional support to make informed and effective decisions. The Trustee delegates some aspects of the Scheme's investment arrangements to third party service providers, in order to manage the Scheme's affairs effectively. The Trustee retains overall responsibility and decision-making power over investment objectives, implementing the investment strategy, the target level of risk and return, investment strategy (the allocation between the main asset classes) and whether to invest in new asset classes.	The Trustee continues to work closely to ensure their policies are met. This includes obtaining written advice from their investment advisors where required. The investment managers are responsible for the day-to-day management of the Scheme's assets in accordance with the mandates agreed with the Trustee. The Trustee is satisfied that they are following this policy in full.
Investment Objectives The Trustee's primary investment objective is to invest the Scheme's assets, within an agreed risk profile, in such a manner that members' benefit entitlements can be paid as and when they fall due.	The Trustee regards the funds held in the DB Section to be appropriate by incorporating assets of appropriate income and liquidity to meet the Trustee's overall investment objectives and to aim to ensure members' benefits can be paid as they fall due. During the reporting period, the Trustee introduced the Insight Global ABS Fund into the Scheme's investment strategy. This Fund was also included within the collateral waterfall managed to Insight's discretion. The Trustee is satisfied that they are following this policy in full.
Risk and Return The Trustee's targets a return consistent with the assumptions made in determining the Scheme's Technical Provisions. The Trustee's policy is to invest in a diversified portfolio of return seeking assets and liability matching assets to meet that level of return at controlled levels of risk.	The funds held by the DB Section incorporated both return seeking assets (e.g. buy and maintain credit, secured finance) and liability matching assets (Liability Driven Investments). The Scheme maintains a risk register of the key risks, including the investment risks. This rates the impact and likelihood of the risks and summarise existing mitigations and additional actions. The Trustee is satisfied that they are following this policy in full.

Diversification of risks The Trustee seeks to spread risks across a range of different sources. They consider the following risks, which they consider as financially material to the Scheme over its anticipated lifetime. - Interest rate risk - Inflation risk - Credit risk - Currency risk - Other price risk - Environmental, Social and Governance (ESG) risk and climate change risk.	The Trustee receives strategic investment advice from the Investment Adviser that includes risk modelling and quantification (e.g. Value at Risk) whenever strategic changes are considered. The Trustee considers both quantitative and qualitative measures for these risks when deciding on strategic asset allocation, deciding on investment policies and the choice of funds, fund managers and asset classes. The Trustee employs liability hedging to explicitly limit interest rate and inflation risk within the Scheme. The Investment Manager's role and approach to managing risk is part of the ongoing monitoring of such managers, particularly when selecting a new Investment Manager during any investment strategy review actions. The Trustee is satisfied that they are following this policy in full.
Investment Manager Appointment, Engagement and Monitoring The Trustee policy is in relation to: - Aligning manager appointments with investment strategy - Evaluating investment manager performance	The Trustee receives quarterly reporting from their Investment Adviser, which includes the asset allocation and compares this with the desired long term strategic allocation. The quarterly report also includes an update on the markets over the period and any market risks on the horizon are highlighted as part of XPS' presentation at the Trustee meeting when appropriate. This quarterly monitoring provided by XPS furnishes the Trustee with the underlying asset class/sector exposures to monitor any unintended risk being taken. The Trustee is satisfied that they are following this policy in full.
Portfolio Turnover Costs The Trustee does not actively monitor the portfolio turnover costs of the assets. The Trustee will continue to monitor industry improvements concerning the reporting of portfolio turnover costs.	Investment manager performance is reported net of transaction costs and therefore managers are incentivised to keep portfolio turnover costs to a minimum. Manager's remuneration is taken into consideration during manager selection exercises, to ensure the Scheme is not paying excessive fees that would detract from the Scheme's return. The Trustee is satisfied that they are following this policy in full.

Manager Turnover The Trustee is a long term investor and do not look to change investment arrangements on a frequent basis. The Trustee will retain an investment manager unless: – There is a strategic change to the overall strategy that no longer requires exposure to that asset class or manager; – The manager appointment has been reviewed and the Trustee is no longer comfortable that the manager can deliver the mandate.	As at the end of the reporting year, the Trustee remained comfortable that the respective investment managers can deliver their mandates. On 29 November 2023, Ares announced the termination of the Secure Income Fund, and has entered a period of wind up where capital is returned to investors. The Trustee is satisfied that they are following this policy in full.
Responsible Investment and Corporate Governance The Trustee's policy is for the Trustees to consider how ESG, climate change and stewardship is integrated within investment processes in appointing new investment managers and monitoring existing investment managers.	When implementing a new manager, the Trustee considers the ESG rating of the manager. There were no new manager appointments over the year. In any future investment strategy reviews, the Trustee will take into consideration manager ESG ratings. The Trustee is satisfied that they are following this policy in full.
Non-financial matters The Trustee's policy is to act in the best interests of the beneficiaries of the Scheme when selecting, retaining or realising investments. It has neither sought nor taken into account the beneficiaries' views on risks including (but not limited to) ethical, social and environmental issues.	For the DB section, the Trustee delegates the management of scheme assets to the investment managers in accordance with their own corporate governance policies and taking account of current best practice including the UK Corporate Governance Code and the UK Stewardship Code. The investment managers are expected to take account of non-financial considerations within the decision-making process. The Trustee is satisfied that they are following this policy in full.
Voting rights The Trustee has delegated responsibility for the exercise of rights (including voting rights) attached to the Scheme's investments to the investment managers.	The investment managers are expected to vote in accordance with their internal voting policies. Given the nature of the DB sections holdings, the respective investment managers do not have opportunity to vote on the Schemes behalf. The Trustee is satisfied that they are following this policy in full.

Voting activity

The Trustee has delegated responsibility for the exercise of rights (including voting rights) attached to the Scheme's investments to the investment managers and encourages them to engage with investee companies and vote whenever it is practical to do so on financially material matters such as strategy, capital structure, conflicts of interest policies, risks, social and environmental impact and corporate governance as part of their decision-making processes. The Trustee requires the investment managers to report on significant votes made on behalf of the Trustee.

In order to ensure sufficient oversight of the engagement and voting practices of their managers, the Trustee may periodically meet with its investment managers to discuss engagement which has taken place. The Trustee will also expect its investment

adviser to engage with the managers from time to time as needed and report back to the Trustee on the stewardship credentials of its managers. The Trustee will then discuss the findings with the investment adviser, in the context of its own preferences, where relevant. This will include considering whether the manager is a signatory to the UK Stewardship Code. The Trustee recognises the Code as an indication of a manager's compliance with best practice stewardship standards.

The voting activity of the Scheme over the reporting year is in relation to the funds the Scheme was invested into throughout the period. The main asset class where the investment managers will have voting rights is equities, as it represents the equity ownership and shareholder's stake within the underlying business. There are likely to be no voting rights for credit-based assets or funds that invest into them.

As such, there was no voting activity within the DB section where the investment strategy is underpinned by credit based assets.