

Grundfos Pumps Ltd and Subsidiary Companies Retirement and Death Benefit Scheme – year to 31 October 2022

Implementation Statement

The Trustees of the Grundfos Pumps Ltd and Subsidiary Companies Retirement and Death Benefit Scheme (the 'Trustees' and the 'Scheme' respectively) have prepared this implementation statement in compliance with the governance standards introduced under The Occupational Pension Plans (Investment and Disclosure) (Amendment) Regulations 2019.

Its purpose is to describe the actions taken over the past year and to demonstrate how the Trustees have followed the policy on voting, stewardship and engagement as set out in the Plan's Statement of Investment Principles ('SIP'), dated September 2022. This statement covers the year to 31 October 2022.

The Scheme's assets are held in pooled investment funds with Columbia Threadneedle Investments ('Threadneedle') and the day-to-day management of these investments (including the responsibility for voting and engaging with companies) is delegated to Threadneedle.

As Trustees of the Scheme's assets, we are responsible for the selection and retention of Threadneedle. Reviewing the voting and engagement activities, for which we include details below, is an important exercise to help us ensure they remain appropriate and are consistent with the fund manager's stated policies in this regard.

We are satisfied with the voting and engagement activities of Threadneedle, and in particular, that they are using their position as stakeholder to engage constructively with investee companies; however, we will engage with them should we have any concerns about the voting and/or engagement activities carried out on our behalf. The Trustees had no cause to challenge the Fund Managers' voting and/or engagement activities during the year to 31 October 2022.

Voting and engagement

Details on voting and engagement activities provided by Threadneedle are set out below. In order to produce this statement we have asked them a series of questions on their policies, actions, and for examples relating to their voting and engagement activities. We have then reviewed this and selected the most relevant comments for the purpose of this statement. Threadneedle are only able to provide the information to each quarter end. The data below is in respect of the year to 30 September 2022.

Threadneedle have provided information relating to the Multi Asset Fund and the Dynamic Real Return Fund, as these funds hold equities for which the fund managers have voting rights.

The Index Linked Bond Fund and the Aquila Life Over 15 Year Gilt Fund do not hold equities and given that the investments do not confer voting rights, no voting or engagement activities were carried out in relation to these funds.

"Columbia Threadneedle Investments views an integrated, joined-up approach to stewardship as an integral part of its responsible approach to investment. This includes engagement with companies, both unilaterally and collaboratively, ongoing monitoring and proxy voting. Proxy voting decisions are made in accordance with the principles established in the Columbia Threadneedle Investments Corporate Governance and Proxy Voting Principles (Principles) document, and our proxy voting practices are implemented through our Proxy Voting Policy.

For those proposals not covered by the Principles, or those proposals set to be considered on a case by case basis (i.e., mergers and acquisitions, share issuances, proxy contests, etc.), the analyst covering the company or the portfolio manager that owns the company will make the voting decision.

The administration of our proxy voting process is handled by a central point of administration at our firm (the Global Proxy Team). Among other duties, the Global Proxy Team coordinates with our third-party proxy voting and research providers.

Columbia Threadneedle Investments utilises the proxy voting platform of Institutional Shareholder Services, Inc. (ISS) to cast votes for client securities and to provide recordkeeping and vote disclosure services. We have retained both Glass, Lewis & Co. and ISS to provide proxy research services to ensure quality and objectivity in connection with voting client securities.

In voting proxies on behalf of our clients, we vote in consideration of all relevant factors to support the best economic outcome in the long-run. As an organisation, our approach is driven by a focus on promoting and protecting our clients' long-term interests; while we are generally supportive of company management, we can and do frequently take dissenting voting positions.

While final voting decisions are made under a process informed by the RI team working in collaboration with portfolio managers and analysts, our Global Proxy Team serves as the central point of proxy administration with oversight over all votes cast and ultimate responsibility for the implementation of our Proxy Voting Policy. Our voting is conducted in a controlled environment to protect against undue influence from individuals or outside groups.

As active investors, well informed investment research and stewardship of our clients' investments are important aspects of our responsible investment activities. Our approach to this is framed in the relevant Responsible Investment Policies we maintain and publish. These policy documents provide an overview of our approach in practice (e.g., around the integration of environmental, social and governance (ESG) and sustainability research and analysis).

As part of this, acting on behalf of our clients and as shareholders of a company, we are charged with responsibility for exercising the voting rights associated with that share ownership. Unless clients decide otherwise, that forms part of the stewardship duty we owe our clients in managing their assets. Subject to practical limitations, we therefore aim to exercise all voting rights for which we are responsible, although exceptions do nevertheless arise (for example, due to technical or administrative issues, including those related to Powers of Attorney, share blocking, related option rights or the presence of other exceptional or market-specific issues).

This provides us with the opportunity to use those voting rights to express our preferences on relevant aspects of the business of a company, to highlight concerns to the board, to promote good practice and, when appropriate, to exercise related rights. In doing so we have an obligation to ensure that we do that in the best interests of our clients and in keeping with the mandate we have from them.

Corporate governance has particular importance to us in this context, which reflects our view that well governed companies are better positioned to manage the risks and challenges inherent in business, capture opportunities that help deliver sustainable growth and returns for our clients. Governance is a term used to describe the arrangements and practices that frame how directors and management of a company organise and operate in leading and directing a business on behalf of the shareholders of the company. Such arrangements and practices give effect to the mechanisms through which companies facilitate the exercise of shareholders' rights and define the extent to which these are equitable for all shareholders.

We recognise that companies are not homogeneous and some variation in governance structures and practice is to be expected. In formulating our approach, we are also mindful of best practice standards and codes that help frame good practice, including international frameworks and investment industry guidance. While we are mindful of

company and industry specific issues, as well as normal market practice, in considering the approach and proposals of a company we are guided solely by the best interests of our clients and will consider any issues and related disclosures or explanations in that context. While analysing meeting agendas and making voting decisions, we use a range of research sources and consider various ESG issues, including companies' risk management practices and evidence of any controversies. Our final vote decisions take account of, but are not determinatively informed by, research issued by proxy advisory organisations such as ISS, IVIS and Glass Lewis as well as MSCI ESG Research. Proxy voting is effected via ISS.

All our voting decisions are available for inspection on our website seven days after each company meeting. In prioritizing our engagement work, we focus our efforts on the more material or contentious issues and the issuers in which we have large holdings – based on either monetary value or the percentage of outstanding shares.

There are many companies with which we have ongoing engagements, as well as a number that we speak to on a more ad hoc basis, as concerns or issues arise.

We actively participate in several investor networks, which complement our approach to engagement. Along with other investors, we raise market and issuer-specific environmental, social and governance issues, share insights and best practice. We do not make use of third-party engagement services."

Threadneedle may consider a vote to be significant if the vote is against management's recommendation (whether against a management proposal where management recommend support, or in favour of a shareholder proposal where management recommends a vote against). Within this, they do not distinguish whether one vote is more significant than another.

Threadneedle Pensions Multi Asset Fund

Threadneedle were eligible to vote on 6,082 resolutions. They voted on 98% of these. Votes: For 90%, Against 8%, Abstained 2%.

The Trustees have reviewed Threadneedle's voting activity and have selected the following as their most significant votes for this fund:

1. Amazon.com, Inc.

Date: 25/05/2022

Resolution: Commission Third Party Report Assessing Company's Human Rights Due Diligence Process

Vote: For

Rationale: Supporting better ESG risk management disclosures

2. Alphabet Inc.

Date: 08/06/2022

Resolution: Report on Metrics and Efforts to Reduce Water Related Risk

Vote: For

Rationale: Supporting better ESG risk management disclosures

3. NIKE, Inc.

Date: 06/10/2021

Resolution: Report on Diversity and Inclusion Efforts

Vote: For

Rationale: Supporting better corporate governance practices

Threadneedle Dynamic Real Return Fund

Threadneedle were eligible to vote on 613 resolutions. They voted on 100% of these. Votes: For 86%, Against 11%, Abstained 3%.

The Trustees have reviewed Threadneedle's voting activity and have selected the following as their most significant votes for this fund:

1. General Motors Company

Date: 13/06/2022

Resolution: Report on the Use of Child Labor in Connection with Electric Vehicles

Vote: For

Rationale: Supporting better ESG risk management disclosures

2. Uber Technologies, Inc.

Date: 09/05/2022

Resolution: Report on Lobbying Payments and Policy

Vote: For

Rationale: Supporting better ESG risk management disclosures

3. Alphabet Inc.

Date: 01/06/2022

Resolution: Report on Physical Risks of Climate Change

Vote: For

Rationale: Supporting better ESG risk management disclosures

Threadneedle do not systematically capture vote results as they are published. Vote outcomes are reported only for UK and US markets, where public disclosure at the vote level is a regulatory requirement.

Where significant dissent is registered against a particular voting item, they expect companies to engage with their shareholders to discuss underlying issues and identify a path to the resolution. Where they identify that Boards have failed to take appropriate action as a result of a shareholder vote in excess of a relevant threshold, their stewardship approach (and the subsequent voting action we take) will take account of this.