NGF Europe Pension Fund

Engagement Policy Implementation Statement for the year ended 31 December 2025

During the year ending 31 December 2025, the Fund's investment policies were implemented in line with the principles set out in the Fund's Statement of Investment Principles (SIP).

The SIP was reviewed and updated in January 2026 but there was no change to the Trustees' policy on responsible asset ownership as a result of this change so the information below covers the whole period.

The Trustee's policy is to delegate responsibility for the exercising of rights (including voting rights) attaching to investments to the investment manager, Legal and General (L&G) and to encourage the manager to exercise those rights in accordance with the Statement of Investment Principles. The Fund invests through pooled fund arrangements and so acknowledges that the investment manager exercises those rights in accordance with their own corporate governance policies on behalf of all investors in its funds. In doing so L&G takes account of current best practice including the UK Corporate Governance Code and the UK Stewardship Code.

The Trustee has considered L&G's stewardship activities in relation to the specific funds the Fund holds having received specific training from L&G on the topic. The Trustee reviewed L&G's approach to stewardship and are comfortable with the activity taken on the Fund's behalf.

The Trustee concludes that, based on these considerations, L&G has followed the requirements of the SIP.

Voting behaviour

L&G's voting decisions are made by their Investment Stewardship team and in accordance with their relevant Corporate Governance & Responsible Investment and Conflicts of Interest policy documents which are reviewed annually. Each member of the team is allocated a specific sector globally so that the voting is undertaken by the same individuals who engage with the relevant company. This ensures the stewardship approach flows smoothly throughout the engagement and voting process and that engagement is fully integrated into the vote decision process, therefore sending consistent messaging to companies. The full voting record and L&G's voting policies can be found on L&G's website: https://vds.issgovernance.com/vds/#/MjU2NQ==/

L&G's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by L&G and they do not outsource any part of the strategic decisions. L&G's use of ISS recommendations is purely to augment their own research and proprietary ESG assessment tools. The Investment Stewardship team also uses the research reports of Institutional Voting Information Services (IVIS) to supplement the research reports that L&G receive from ISS for UK companies when making specific voting decisions.

To ensure the proxy provider votes in accordance with L&G's position on ESG, they have put in place a custom voting policy with specific voting instructions. These instructions apply to all markets globally and seek to uphold what L&G consider are minimum best practice standards that all companies globally should observe, irrespective of local regulation or practice.

L&G summarises its voting record across all markets each quarter. This information is available on request. The Trustees receive regular updates from L&G in its quarterly reporting on these activities.

Examples of L&G's engagement activities during the 12 months to 31 December 2025

Active ownership, which is a broader topic than voting in isolation, forms a key part of how L&G conducts responsible investing. This is reflected in the following activities conducted on behalf of the Fund.

- Company engagement

- Using voting rights globally, with one voice across all active and index funds
- Addressing systemic risks and opportunities
- Seeking to influence regulators and policymakers
- Collaborating with other investors and stakeholders

The examples below demonstrate some of the specific initiatives undertaken by L&G in this regard during the year.

Climate impact pledge

The Climate Impact Pledge ('CIP') is L&G's climate-focused engagement programme, targeting 20 'climate-critical' sectors which are responsible for the most global greenhouse gas emissions from listed companies, as well as being the most carbon intensive sectors in L&G's portfolios. Through a quantitative assessment of c.5,000 companies and direct engagement with c.100 companies, L&G aim to drive improvements in approaches to the climate transition. Companies that do not meet L&G's published minimum standards may receive a vote against the relevant director at their AGM and, for the qualitatively assessed companies, may be excluded from certain L&G funds (and potentially reinstated if they subsequently improve).

Key facts and figures from L&G's 2025 CIP engagement include:

- 245 votes against companies in the quantitative stream, a 46% improvement versus 2024
- 28 votes against companies in the qualitative stream, a 24% improvement versus 2024
- Following improvement, 1 company was reinstated in applicable funds: Cosco Shipping Holdings (which had been on the CIP divestment list since 2023)
- 15 companies remain on the CIP divestment list (for applicable funds)

Deforestation campaign

This year, L&G integrated their deforestation campaign letters into the broader outreach of their Climate Impact Pledge, to streamline the communications that companies receive from them. L&G sent 2,900 climate and deforestation letters to companies in March and April 2025. The letters were divided into three 'batches', depending on whether the focus was climate, deforestation or both. The aim of the letters was:

- To communicate L&G's campaigns and expectations
- To direct companies to their Climate Impact Pledge score website, as an assessment tool
- To call companies to action on improving areas highlighted as amber or red under L&G's Climate Impact Pledge Score (which includes indicators for both elements of their deforestation expectations)
- To communicate the potential vote implication for companies not meeting L&G's minimum expectations

Policy dialogue

UK Highlights: Deforestation

L&G are active members of the Investors Policy Dialogue on Deforestation (IPDD), an investor-led sovereign engagement initiative that aims to halt deforestation. Through their membership and participation, L&G contribute to discussions, research and engagements with governments in countries that are vulnerable to deforestation, contributing to policy dialogue. L&G's Asset Management business co-chairs a working group established by the IPDD. This group will engage on the deforestation-free commodity regulations being debated and implemented in the UK, US, Europe and latterly China.

Following the introductory IPDD letter sent to the UK Department for Energy Security and Net Zero (DESNZ) in October 2024, members of the IPDD Consumer Countries working group met with Minister for Climate, Kerry McCarthy and other DESNZ representatives in January 2025. IPDD members, including L&G, shared views on the importance of addressing deforestation, key barriers and opportunities, and how institutional investors can support government dialogues on this topic.

International highlights: Income inequality

Looking back at the 2025 AGM season in Japan, L&G can highlight a number of shifts that they believe are the result of sustained pressure from domestic and international investors, regulatory nudges, and a growing recognition among corporate leaders that good governance and addressing sustainability issues are strategic advantages. Some of L&G's key observations are as follows:

• Since 2022, L&G applied a voting policy whereby companies holding 20% or more of their net assets to cross shareholdings may face a vote against management. The number of their votes against management on this issue has steadily decreased, from 154 during Q2 2022 to 75 during Q2 2025.

• L&G's votes against directors at Japanese companies on independence grounds decreased by 35% in comparison to the 2024 AGM season, despite having strengthened their criteria with a 12-year limit expectation on tenure.

• L&G's increase in votes on diversity was driven by the ratcheting up of their expectations, which now extend to TOPIX 500 companies having at least 15% female board representation, and boards of all Japanese-listed companies having at least one female director.

• On diversity, the focus in Japan is shifting from token representation to meaningful participation – ensuring both male and female directors contribute effectively to board discussions.

Analysing the voting data over time provides L&G with an indication of broader market trends and also helps them assess whether their policies are balancing ambition with reality, and the time it takes for companies to make the improvements they seek.

As Japan's 2025 proxy season drew to a close, it became clear that the market is undergoing a quiet but meaningful transformation. Companies are increasingly unwinding cross-shareholdings, appointing more independent directors, and enhancing board diversity, supported by the FSA's Action Program for Corporate Governance Reform and the Tokyo Stock Exchange's reforms to improve corporate capital efficiency. These are not just box-ticking exercises; L&G believe they signal a deeper commitment to long-term value creation.

Company specific

Shell

A shareholder proposal (Resolution 22) was filed at the 2025 AGM requesting the company to disclose whether and how its: demand forecast for LNG; LNG production and sales targets; and new capital expenditure in natural gas assets; are consistent with climate commitments, including the target to reach net zero emissions by 2025. This proposal enabled L&G to engage in a series of highly technical and detailed discussions with the company.

L&G's primary focus in their engagement has been on understanding the balance sheet risks associated with the company's growing exposure to liquified natural gas ('LNG'), and on ensuring the company demonstrates business resilience across multiple climate transition scenarios. After careful consideration, L&G did not support Resolution 22; received clear commitments that the company will enhance its reporting in line with L&G's expectations—specifically, providing detailed disclosures on stranded asset risks and financial resilience related to Shell's growing exposure to LNG. These gaps were key reasons L&G were unable to support the company's climate transition strategy at its 2024 AGM.

Significant votes for the Fund during the year

In determining significant votes, L&G takes into account the criteria provided by the Pensions & Lifetime Savings Association (PLSA) and the Fund's Statement of Investment Principles. This includes but is not limited to:

- High profile vote which has such a degree of controversy that there is high client and/or public scrutiny

- Significant client interest for a vote
- Sanction vote as a result of a direct or collaborative engagement
- Vote linked to an L&G engagement campaign

The Fund was invested c.31.5% in L&G's Multi-Asset Fund and c.8.4% in L&G's Multi Asset Target Return Fund as at 31 December 2025. Significant votes for these funds during the year to 31 December 2025 have been summarised in the table below:

The Trustees deem this voting behaviour to be in line with the Fund's stewardship priorities, which include but are not limited to climate change, biodiversity, diversity and ethnicity, remuneration and governance.

L&G Future World Multi-Asset Fund

Company Name	Details of Vote
Anglo American Plc	**Date of vote**: 09/12/2025 **Approximate size of Fund's holding:** 0.01% **Summary of the resolution:** Resolution 2: Amend Restricted Stock Plan **How L&G voted:** Against **Rationale for voting decision:** Remuneration - Retrospective change: A vote against is applied as the proposed retrospective amendments to the LTIP guarantee a minimum vesting level for the 2024 and 2025 awards, based on the merger going through. Such retrospective changes and guaranteed transaction bonuses are a breach of our remuneration policies. While L&G had detailed and constructive engagements with the Company, they were not able to obtain sufficient assurance and a clear indication of direction of future performance-based incentive plans to alleviate our concern at this time. **Why was the vote significant?** Pre-declaration: This shareholder resolution is considered significant due to the relatively high level of support received. More information on L&G s Asset Management business pre-declaration can be found here: Our https://blog.landg.com/categories/esg-and-long-term-themes/our-voting-intentions-for-2025/ **Outcome:** Withdrawn
Computershare Limited	**Date of vote**: 25/10/2025 **Approximate size of Fund's holding:** 0.01% **Summary of the resolution**: Resolution 2: Elect Tiffany Fuller as Director **How L&G voted:** Against **Rationale for voting decision:** Diversity: A vote against is applied as L&G expects a company to have a diverse board, with at least one-third of board members being women. L&G expect companies to increase female participation both on the board and in leadership positions over time. Auditor independence - Accountability: L&G note concerns with the auditor's independence given their long tenure and/or excessive non-audit fees being paid. As shareholders are not afforded a separate resolution to vote on the auditor's ratification, a vote against the Audit Committee member is warranted to highlight L&G's concerns.

	Why was the vote significant? Thematic - Diversity: L&G views gender diversity as a financially material issue for their clients. **Outcome:** Pass
Palo Alto Networks Inc.	**Date of vote**: 09/12/2025 **Approximate size of Fund's holding:** 0.03% **Summary of the resolution:** Shareholder Resolution - Board structure: A vote in favour is applied as L&G supports a declassified board as directors should stand for re-election on an annual basis. **How L&G voted:** For **Rationale for voting decision:** Shareholder Resolution - Board structure: A vote in favour is applied as L&G supports a declassified board as directors should stand for re-election on an annual basis. **Why was the vote significant?** High Profile meeting: This shareholder resolution is considered significant due to the relatively high level of support received. **Outcome:** Pass
Sims Limited	**Date of vote**: 21/11/2025 **Approximate size of Fund's holding:** 0.01% **Summary of the resolution:** Resolution 6: Reduce Ownership Threshold for Shareholders to Call Special Meeting **How L&G voted:** Against **Rationale for voting decision:** Climate change: A vote against is applied as L&G expects companies to introduce credible transition plans, consistent with the Paris goals of limiting the global average temperature increase to 1.5°C. This includes the disclosure of scope 1, 2 and material scope 3 GHG emissions and interim GHG emissions reduction targets consistent with the 1.5°C goal. **Why was the vote significant?** Thematic - Climate: L&G is publicly supportive of so called "Say on Climate" votes. L&G expect transition plans put forward by companies to be both ambitious and credibly aligned to a 1.5C scenario. Given the high-profile nature of such votes, L&G deem such votes to be significant, particularly when L&G votes against the transition plan. **Outcome**: Pass
Lam Research Corporation	**Date of vote**: 04/11/2025 **Approximate size of Fund's holding:** 0.08% **Summary of the resolution:** Resolution 6: Reduce Ownership Threshold for Shareholders to Call Special Meeting **How L&G voted:** For **Rationale for voting decision:** Shareholder Resolution - Shareholder rights: A vote in favour is applied as the current threshold necessary to call a special

	meeting is high and this resolution is seeking to reduce the threshold. **Why was the vote significant?** High Profile meeting: This shareholder resolution is considered significant due to the relatively high level of support received. **Outcome:** Fail

How many meetings were you eligible to vote at over the year: 9,688
How many resolutions were you eligible to vote on over the year: 98,837
What % of resolutions L&G voted on where eligible: 98.89%
Of the resolutions on which L&G voted, the % voted with management was: 75.11%
Of the resolutions on which L&G voted, the % voted against management was: 24.04%
Of the resolutions on which L&G voted, the % abstained was: 0.84%

L&G Multi-Asset Target Return Fund

Company Name	Details of Vote
Lam Research Corporation	**Date of vote**: 04/11/2025 **Approximate size of Fund's holding**: 0.16% **Summary of the resolution:** Resolution 1e: Elect Director Michael R. Cannon **How L&G voted:** Against **Rationale for voting decision:** Remuneration Committee independence: A vote against has been applied due to insufficient independence on the Committee. Diversity: A vote against is applied as L&G expects a company to have at least one-third of women on the board. Independence: A vote against is applied as L&G expects the Chair of the Nominations/Governance Committee to have served on the board for no more than 12 years in order to maintain independence and a balance of relevant skills, experience, tenure, and background. **Why was the vote significant?** Thematic - Diversity: L&G views gender diversity as a financially material issue for clients. **Outcome:** Pass
Palo Alto Networks, Inc.	**Date of vote**: 09/12/2025 **Approximate size of Fund's holding:** 0.11% **Summary of the resolution:** Resolution 1a: Elect Director John M. Donovan **How L&G voted:** Against **Rationale for voting decision:** Remuneration - Accountability: A vote against is applied as part of L&Gs escalation strategy as they have had concerns with the remuneration practices for the past year. Joint Chair/CEO: A vote against is applied as L&G expects companies to separate the roles of Chair and CEO due to risk management and oversight concerns. Lead Independent Director - Accountability: A vote against is applied as L&G expects companies to elect an independent lead director where there is a combined Board Chair and CEO. Lead Independent Director: A vote against is applied as L&G expects companies to elect an independent lead director where there is a combined Board Chair and CEO. Independence: A vote against is applied as L&G expects

	the Chair of the Nominations/Governance Committee to have served on the board for no more than 12 years in order to maintain independence and a balance of relevant skills, experience, tenure, and background. Independence: A vote against is applied as L&G expects the Lead Director to have served on the board for no more than 12 years in order to maintain independence and a balance of relevant skills, experience, tenure, and background. Classified Board: A vote against is applied as L&G supports a declassified board as directors should stand for re-election on an annual basis. **Why was the vote significant?** Thematic - Board Leadership: L&G considers this vote to be significant as it is in application of an escalation of their vote policy on the topic of the combination of the board chair and CEO. **Outcome:** Against
Microsoft Corporation	**Date of vote**: 05/12/2025 **Approximate size of Fund's holding:** 0.05% **Summary of the resolution:** Resolution 1f: Elect Director Satya Nadella **How L&G voted**: Against **Rationale for voting decision:** Joint Chair/CEO: A vote against is applied as L&G expects companies to separate the roles of Chair and CEO due to risk management and oversight concerns. **Why was the vote significant?** Thematic - Board Leadership: L&G considers this vote to be significant as it is in application of an escalation of their vote policy on the topic of the combination of the board chair and CEO. **Outcome:** Pass
ENGIE SA	**Date of vote:** 24/04/2025 **Approximate size of Fund's holding:** 0.04% **Summary of the resolution:** Resolution 14: Approve Company's Climate Transition Plan **How L&G voted:** Against **Rationale for voting decision:** Climate Change: A vote Against this plan is warranted. While L&G acknowledge the company's progress earning a well below 2°C verification from SBTi from the previous 2°C aligned pathway, as well as its previously stated net-zero by 2045 target covering all scopes of emissions, they feel there is additional context on the company's assumptions and strategy that is needed to support the transition plan. Concerns remain that the company's electricity generation targets are not aligned with a 1.5C pathway, and while the company explained challenges with selling its thermal assets to be aligned with 1.5C by 2030, it is not clear whether other methods of achieving a lower carbon intensity by 2030 were considered and why they are not viable. Additionally, L&G would encourage further disclosure on the risks related to the technology and policy dependencies of its medium and long-term targets for its thermal assets. **Why was the vote significant?** Thematic - Climate: L&G's Asset Management business is publicly supportive of so called "Say on Climate" votes. L&G expect transition plans put forward

	by companies to be both ambitious and credibly aligned to a 1.5C scenario. Given the high-profile nature of such votes, L&G's Asset Management business deem such votes to be significant, particularly when L&G's Asset Management business, votes against the transition plan. **Outcome:** The vote passed.
United Bank Ltd.	**Date of vote:** 19/03/2025 **Approximate size of Fund's holding:** 0.05% **Summary of the resolution:** Resolution 2: Accept Financial Statements and Statutory Reports **How L&G voted:** Against **Rationale for voting decision:** Climate Impact Pledge: A vote against is applied as the company is deemed to not meet minimum standards with regard to climate risk management as set out in L&G's public Climate Impact Pledge ratings. **Why was the vote significant?** Thematic - Climate: L&G considers this vote to be significant as it is applied under the Climate Impact Pledge, their flagship engagement programme targeting companies in climate-critical sectors. **Outcome:** The vote passed.

How many meetings were you eligible to vote at over the year: 327
How many resolutions were you eligible to vote on over the year: 3196
What % of resolutions L&G voted on where eligible: 100%
Of the resolutions on which L&G voted, the % voted with management was: 74.84%
Of the resolutions on which L&G voted, the % voted against management was: 24.09%
Of the resolutions on which L&G voted, the % abstained was: 1.06%