Bechtel Limited Pension Plan
Appendix – Implementation Statement

Introduction

This Implementation Statement (the "Statement") sets out the Trustees' views on how, and the extent to which the Trustees' investment objectives and policies, as set out in their Statements of Investment Principles ("SIP") (one for the Final Salary Section and one for the Money Purchase Section) have been followed during the year to 31 March 2026.

This Statement has been produced in accordance with The Pension Protection Fund (Pensionable Service) and Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018 and the subsequent amendment in The Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019, which transposes the EU Shareholder Rights Directive (SRD II) into UK law. The Directive aims to encourage institutional investors, including pension funds, to engage more actively with the companies that they invest in.

The SIPs in respect of both the Final Salary Section and the Money Purchase Section are enclosed within the Trustees' annual reports and are available online at:
https://www.bechtel.com/wp-content/uploads/2025/08/Bechtel-SIP-May-2025.pdf
https://www.bechtel.com/wp-content/uploads/2025/03/Bechtel-MP-SIP-VF.pdf

Note that in 2024 the Trustees purchased an insurance policy with the specialist insurance company Pension Insurance Corporation ("PIC") to secure certain benefits of the Plan. Specifically, the Final Salary benefits within Section I of the Plan and the defined benefit underpin liabilities within Section II of the Plan were secured.

Trustees' Investment Objectives for the Plan

The Trustees believes it is important to consider their investment policies in the context of the objectives they have set. The Trustees' objectives for the Plan are as follows:

Final Salary Section

The Trustees' primary objective is to act in the best interests of the Plan's members. To achieve this, the Trustees' investment objective is to follow a low-risk strategy that protects the Plan's surplus funding position under a conservative funding basis.

Money Purchase Section

The Trustees recognise that individual members have differing investment needs and that these may change during the course of their working lives. It also recognises that members have differing attitudes to risk. The Trustees' objectives are therefore:

i. *To provide members with a range of investment options to enable them to tailor investment strategy to their needs, specifically in controlling the risks inherent in their savings. In particular, to make available vehicles which aim:*

   a. To maximise the value of members' assets at retirement.

Trustees' Investment Objectives for the Plan (continued)

Money Purchase Section (continued)

b. To maintain the purchasing power of members' savings.

c. To provide protection for members' accumulated assets in the years approaching retirement against:

- *Sudden (downward) volatility in the capital value;*
- *Fluctuations in the (implicit and explicit) cost of retirement benefits.*

ii. *To maintain a default investment option that is broadly reasonable for any member not wishing to make their own investment decisions. The Plan is now closed to new members but a number of existing members are invested in a default investment option.*

iii. *To avoid over-complexity in investment in order to keep administration costs and employee understanding to a reasonable level.*

iv. *To inform members, through a policy of clear communication and education, about their investment options in relation to the potential risks and anticipated rewards of, and charges associated with, each option.*

Review of the Final Salary Section SIP

The Final Salary Section's SIP was last reviewed and published in May 2025, to reflect changes to the hedging strategy for a portion of the Plan's liabilities. A copy of the Final Salary Section SIP is available at https://www.bechtel.com/wp-content/uploads/2025/08/Bechtel-SIP-May-2025.pdf.

Review of the Money Purchase Section SIP

The Money Purchase Section SIP was last reviewed during Q4 2023 and finalised in December 2023, when the principal change was to add a policy on illiquid assets, as now required by regulation. A copy of the Trustees' Money Purchase Section SIP is available at https://www.bechtel.com/approach/ethics/. No changes were required to the SIP during the year covered by this statement.

Assessment of how the Trustees' policies have been followed for the year to 31 March 2026

The information provided in the following table highlights the work undertaken by the Trustees during the year, and longer term where relevant, and sets out how this work was in line with their objectives and policies.

In summary, it is the Trustees' view that their objectives and policies in the SIPs have been followed during the Plan year to 31 March 2026.

Requirement	Policy/paragraph of SIP	In the year to 31 March 2026
Securing compliance with the legal requirements about choosing investments	Final Salary: Paragraph 1 Money Purchase: Paragraph 1	Final Salary Section At the 15 April 2025 Trustee meeting, the Trustees received advice on the liability hedging strategy to be adopted for a portion of the Plan's remaining libailities not covered by the PIC insurance policy. The Trustees obtained and consider the written advice of the appointed investment consultant, whom the Trustees believe to be suitably qualified to provide such advice. The advice arrangements are, in the Trustees' view, consistent with their objectives and the requirements of Section 36 of the Pensions Act 1995 (as amended). Money Purchase Section The Trustees did not choose any new investments during the year.
Kinds of investments to be held and the balance between different kinds of investments	Final Salary: Paragraph 5 Money Purchase: Paragraph 4	Final Salary Section As at the Plan year end, in line with the objectives and policies set out in the SIP, the Plan's most significant investment was an insurance policy with PIC. The Plan also held a balancing investment in a diversified portfolio of cash deposits and money market investments and liability matching gilts. During the year, the hedging strategy for the residual assets and liabilities was updated (as noted above). The changes were documented in a revised SIP. Money Purchase Section

Requirement	Policy/paragraph of SIP	In the year to 31 March 2026
		No changes were made to the investments (fund type, management style and asset allocations) used within the Money Purchase Section during the year.
Risks, including the ways in which risks are to be measured and managed	Final Salary: Paragraph 4 Money Purchase: Paragraph 3	The Trustees maintained a Risk Register during the year that outlines risks by category, and considers the impact, likelihood, and responses / mitigations for each risk. Final Salary Section The Trustees significantly reduced the Plan's investment risks in 2024 by using the majority of the Plan's invested assets to purchase an insurance policy issued by PIC. In addition to the policy, the Plan's assets at the year-end consisted of investments in cash deposits, money market instruments and gilts. The Trustees manage the risks associated with these investments by ensuring the cash and money market instruments are well diversified and investment is only in the instruments of issuers with investment grade credit ratings. The risk associated with the gilt holdings is that they do not accurately match the liabilities. The Trustees received advice from the investment consultant on how this risk could be minimised.

Requirement	Policy/paragraph of SIP	In the year to 31 March 2026
		Money Purchase Section The Trustees reviewed the measurement of a number of the risks in the SIP on a quarterly basis as part of regular investment performance reporting. These quarterly reports were provided by the Plan's main Money Purchase Section investment manager, Legal & General Investment Management ("L&G"). Additionally, the Trustees met with L&G at the 15 April 2025 Trustee meeting to discuss performance and risks. During the year, the Trustees explored options for the future investment of the Plan's remaining Money Purchase Section assets and Additional Voluntary Contribution (AVC) arrangements. As part of this review, investment risks were considered. This was done by comparing the investment strategies (and their risk and return characteristics) offered by different potential providers for future investment. The Trustee is satisfied that the SIP policies have been followed during the period.
Expected return on investments	Final Salary: Paragraph 5 Money Purchase: Paragraph 4 (regarding the default strategy) and 8 (which confirms that benchmark returns are in place and are	Final Salary Section For the Plan's cash and money market investments, returns are expected to be in line with interest rates on short term cash deposits. For the Plan's gilt investments,

Requirement	Policy/paragraph of SIP	In the year to 31 March 2026
	monitored).	returns are expected to be in line with changes in the cost of securing the expected liabilities they are held to match with PIC. Money Purchase Section There were no changes to the benchmarks or expected return targets set for the Plan's mandates, which continued to be consistent with the SIP policies.
Realisation of investments	Final Salary: Paragraph 6 Money Purchase: Paragraph 4 (regarding the default arrangement) and 6.	The Trustees receive a report each quarter from the Plan administrator that details the extent to which benefit payments and other core financial transactions have been processed within service level agreements and regulatory timelines. There were no issues experienced with realisation of investments during the period. Final Salary Section No issues were experienced with the realisation of investments during the Plan year. The insurance policy is expected to meet the majority of the Plan's cashflow requirements. Money Purchase Section All funds are daily dealt and priced pooled investment vehicles, with the exception of one fund which is weekly priced. The funds are accessed through an insurance contract. No issues were experienced with the realisation of

Requirement	Policy/paragraph of SIP	In the year to 31 March 2026
		investments during the Plan year.
Financially material considerations over the appropriate time horizon, including in selection, retention & realisation of investments	Final Salary: Paragraph 4 Both Sections: The risks identified in the SIPs are considered by the Trustee to be 'material financial considerations'.	Final Salary Section Throughout the year, the Plan's investments were designed to address the mismatch, diversification, investment manager, illiquidity and custody risks identified in the SIP. Money Purchase Section The investment considerations of the Trustee during the year related to financially material risks and were therefore in line with the SIP policies.
The extent to which non-financial matters are taken into account in the selection, retention and realisation of investments	Final Salary: Paragraph 8 Money Purchase: Paragraph 7 and 8.	Both Sections The Trustees believe that good stewardship and the incorporation of environmental, social, and corporate governance (ESG) factors into their investment decision-making processes can have a material impact on the financial and non-financial performance of the Plan's assets over the medium and longer term. No member views on investment matters (financial or non-financial) were received by the Trustees during the year. Money Purchase Section The Plan makes available to members a Stewardship Fund which has explicit sustainability-related guidelines including non-financial

	Requirement	Policy/paragraph of SIP	In the year to 31 March 2026
			exclusions for certain sectors, such as thermal coal and weaponry.
The exercise of rights (including voting rights) of the investments **Undertaking engagement activities in respect of the investments**	Final Salary: Paragraph 8 Money Purchase: Paragraph 7.	Final Salary Section Whilst the Trustees have policies in place relating to this requirement, given the nature of the underlying assets classes that the Plan invested in during the year, the Trustees were not able to apply their polices during the year. For example, there were no voting rights attaching to the investments during the period. Money Purchase Section During the year, the Plan continued to invest only in pooled funds, where voting and engagement is delegated to investment managers with oversight from the Trustees. The main Money Purchase investment manager provides stewardship reporting within its quarterly reports. This assists the Trustees with ensuring that voting and engagement activities undertaken on the Plan's behalf are consistent with our policies. The Trustees also request and review annually voting and engagement activities in respect of the investment managers (see later in this Statement).	
How the arrangement(s) incentivise the manager to align its strategy / decisions with trustees' policies.	Final Salary: Paragraph 8 Money Purchase: Paragraph 8.	Final Salary Section Whilst the Trustees have policies in place relating to this requirement, given the nature of the underlying assets classes that the Plan invested in during the year, the Trustees were not able to apply their polices during the year. Money Purchase Section No changes in policy (last reviewed December 2023 as part of SIP review).	
How the arrangement incentivises the manager to make decisions based on	Final Salary: Paragraph 8 Money Purchase: Paragraph	Final Salary Section Whilst the Trustees have policies in	

Requirement	Policy/paragraph of SIP	In the year to 31 March 2026
assessments of medium to long-term financial/non-financial performance and engage with issuers to improve performance.	8.	place relating to this requirement, given the nature of the underlying assets classes that the Plan invested in during the year, the Trustees were not able to apply their polices during the year. Money Purchase Section No changes in policy (last reviewed December 2023 as part of SIP review).
How the method and time horizon of evaluation of manager performance and the remuneration for asset management services are in line with the trustees' policies.	Final Salary: Paragraph 8 Money Purchase: Paragraph 8.	Final Salary Section Whilst the Trustees have policies in place relating to this requirement, given the nature of the underlying assets classes that the Plan invested in during the year, the Trustees were not able to apply their polices during the year. Money Purchase Section: The Trustees review annually (as part of preparation of the Chair's Statement) the extent to which the Plan provides value for money. This includes reviewing the fees paid to the investment managers, which allows us to ensure that the remuneration of the managers is in line with our policies. No issues were identified during the year.
How trustees monitor portfolio turnover costs incurred by the manager, and how they define and monitor targeted portfolio turnover or turnover range.	Final Salary: Paragraph 8 Money Purchase: Paragraph 8.	Final Salary Section Whilst the Trustees have policies in place relating to this requirement, given the nature of the underlying assets classes that the Plan invested

Requirement	Policy/paragraph of SIP	In the year to 31 March 2026
		in during the year, the Trustees were not able to apply their polices during the year. Money Purchase Section Transaction costs are monitored annually as part of preparation of the annual Chair's Statement which is published on a public website. The Trustees will continue to monitor transaction costs but has not set portfolio turnover targets; the Trustees instead assess performance net of the impact of the costs of turnover.
The duration of the arrangement with the asset manager	Final Salary: Paragraph 9 Money Purchase: Paragraph 8.	Final Salary Section Whilst the Trustees have policies in place relating to this requirement, given the nature of the underlying assets classes that the Plan invested in during the year, the Trustees were not able to apply their polices during the year. Money Purchase Section There were no changes to this policy during the year.

Engagement policy statement

The SIPs set out the Trustees' policies on environmental, social and governance (ESG) considerations, including stewardship and climate change.

Engagement Activity During the Year
The Trustees dedicate time at their meetings to consider ESG matters. The following work was undertaken during the Plan year relating to the activity on such matters. This summary also documents how the Plan's engagement and voting policies were implemented during the year.

Final Salary Section

Given the nature of the underlying assets that the Plan invested in during the year, the Trustees undertook no direct engagement activity during the period. However, as a general rule, and where appropriate for the asset class, the Trustees would expect the appointed investment managers to evaluate ESG factors, including climate change, and exercise voting rights and stewardship obligations attached to the investments, in accordance with their own corporate governance policies and current best practice, including the UK Corporate Governance Code and UK Stewardship Code.

Money Purchase Section

The following activity was carried out during the Plan year:

Activity	Date	Details
Investment manager engagement	15 April 2025	The Trustees met with the main investment manager to the Money Purchase Section, Legal & General Investment Management ("L&G", the manager of c99% of the assets of the Money Purchase Section). A substantial part of the manager's presentation was focused on ESG issues, with a particular focus on engagement and voting. The following topics were discussed: - The exclusions policies within the L&G funds. - Net zero alignment, with a focus on portfolio decarbonisation targets. - L&G's stewardship themes, which include climate, health, and digitisation. - The manager's "Climate Impact Pledge" which aims to improve market standards with regards to climate-risk management. - Results from L&G's latest annual cycle of company-level engagements, including examples of using an escalation policy to apply sanctions to companies where expectations were not met.
Corporate governance monitoring	Quarterly	Within quarterly investment report, L&G provide a summary of their corporate governance activities. Examples during the Plan year included: **1. Climate and nature: water industry engagement** Over Q4 2025 and Q1 2026, L&G carried out engagements with directors at several large UK water utility companies. These discussions focused on how boards are navigating the evolving regulatory environment, managing environmental and climate / nature risks, and overseeing leadership transitions amid heightened individual company scrutiny from the media and public. L&G also provided input via the Investor Forum process on regulatory reform of the sector, noting the importance of considering nature-related risks and nature-based solutions within longer-term system planning. **2. Social considerations: the living wage** The L&G Group co-signed a "call to action" letter to UN Member States, requesting that they prioritise the issue of the living wage at the Second World Summit for Social Development in November 2025. The letter also called on UN Member States to recognise the International Labour Organisation's articulation of the concept of the living wage, to clarify the

Activity	Date	Details
		responsibility of states and businesses in ensuring workers receive a living wage, to establish and support a time-bound global living wage target for large and transnational companies, and finally to take appropriate legal and policy measures to promote these aims. **3. Governance** L&G is a member of the Asian Corporate Governance Association and ASEAN Working Group. As part of this collaborative engagement, L&G contributed to a consultation response on the Singapore Exchange's proposed amendments to its listing rules concerning disclosures on executive remuneration (including important corporate governance principles such as the linkage between pay and performance, dividend policy, and investor relations practices).
Stewardship monitoring	Q3 2025	The Trustees reviewed the voting and engagement activities of the Plan's investment managers as part of reviewing and approving the annual Implementation Statement.

Voting Activity during the Plan year

Policy, Stewardship Priorities, and Significant Votes

As the Plan invests in pooled funds, rather than investing in companies directly, the managers of the pooled funds are responsible for the exercise of rights (including voting rights) attaching to the Plan's investments. In general, the Trustees believe that the investment managers of pooled funds are typically best placed to exercise voting rights and prioritise particular engagement topics by security, given they are expected to have detailed knowledge of both the governance and the operations of the companies and issuers they invest in.

Given the large number of votes considered by investment managers for every company in every fund / portfolio, along with the timescales over which voting takes place and the resource and expertise required, the Trustees did not identify significant votes ahead of the reporting period. Instead, the Trustees have (with the support of its advisers) retrospectively reviewed the managers' voting records to identify significant votes relating to the Trustees' stewardship priorities, which are:

- Climate change
- Human rights and labour practices
- Diversity, equity, and inclusion.

Final Salary Section

As the Plan held no holdings in securities with voting rights during the Plan Year, there is no voting data or significant votes to report.

Money Purchase Section

The Trustees delegate voting rights to the investment managers. Most votes arise in respect of public equities and the Trustees have received voting data relating to funds that invest in public equities.

The Plan makes available to members the following daily dealt, daily priced pooled funds. Funds highlighted in blue rows in the table hold equities.

Voting Activity during the Plan year (continued)

Money Purchase Section (continued)

L&G Funds	Other Funds
Multi-Asset	Aviva BlackRock UK Equity Index Tracker
L&G Diversified	Aviva With Profits
L&G Global Equity (70:30) Index	Aviva Stewardship
Over 5 year Index-Linked Gilts	
Over 15 year Fixed Interest Gilts	
Cash	

The Trustees have been provided with the voting disclosures relating to the funds listed in the table which invest in public equities (shaded in blue). These are summarised overleaf.

Note that due to the pooled fund nature of the arrangements, the number of funds in which the Plan invests (across two providers), and cross-holdings between funds, it is not possible to calculate holding sizes for individual companies at the Plan level.

Voting Activity during the Plan year (continued)

Money Purchase Section (continued)

Fund	12 Months to 31 March 2026 unless otherwise stated					
	No. meetings eligible to vote	No. resolutions eligible to vote	% resolutions voted on where eligible	Of resolutions voted, % voted with management	Of resolutions voted, % voted against management	Of resolutions voted, % abstained
L&G Funds						
Multi-Asset	10,611	108,151	100%	75%	24%	1%
Diversified	9,195	99,713	100%	76%	23%	1%
Global Equity (70:30) Index	7,448	76,354	100%	79%	19%	1%
Other Funds						
Aviva BlackRock UK Equity Index Tracker	716	9,788	99%	97%	3%	0%
Aviva With Profits	Aviva are unable to provide voting data for this fund, as it comprises a number of underlying funds managed by different managers					
Aviva Stewardship	52	924	100%	98%	1%	1%

Source: Investment Managers. Totals may not sum due to rounding.

Significant votes (Money Purchase Section)

The following tables provide details of significant votes for each fund used by the Plan (where equities are held within the fund), aligned with the Trustees' stewardship priorities.

To ensure that this statement is inclusive for all members regardless of which funds they invest in, we provide a significant vote for every fund. There is a very large number of votes for each fund, but we consider that the votes set out on the following pages are a well-rounded reflection of the types of issues considered, and the voting practices of the managers.

While votes themselves are important, in the majority of cases they form just one part of an investment manager's stewardship process. In the votes listed here, the manager in all cases planned to follow up with the company, either through direct or collaborative engagement, as part of their ongoing stewardship activities.

L&G Multi-Asset Fund	
Company/item	National Australia Bank - shareholder resolutions to approve disclosure of financed deforestation and approve strategy to eliminate financed deforestation
Date	12 December 2025
Stewardship priority	Climate change
Vote	For
Rationale	L&G voted in favour of two shareholder resolutions relating to deforestation. The first was to request that National Australia Bank publish details of the deforestation it finances. L&G voted for the proposal, as they expect companies to be taking sufficient action on climate and nature. Enhanced disclosure on financed deforestation exposure would improve transparency on material environmental and credit risks given the bank's meaningful exposure to agri-business lending. Additional, decision-useful disclosure aligned with credible frameworks such as the Accountability Framework Initiative that recognises legal and illegal deforestation risks, and quantifies exposure where practicable, would be beneficial to shareholders, in L&G's view. The second vote was to request that the company disclose its strategy to eliminate financed deforestation. L&G voted for this request, on the grounds that such disclosures would provide shareholders with visibility on governance, targets, client expectations, controls, and escalation pathways for this financially material risk.
Outcome	Failed

L&G Diversified Fund	
Company/item	Marks & Spencer Group PLC (M&S) - shareholder resolution requesting for the company to "oversee the preparation of a report to provide investors the information needed to assess the company's approach to human capital management"
Date	1 July 2025
Stewardship priority	Human rights and labour practices.
Vote	For
Rationale	Shareholders filed a resolution at the 2025 M&S Annual General Meeting, requesting the disclosure of data on workers paid below the Real Living Wage and a cost-benefit analysis of implementing it. L&G voted for the proposal. While they acknowledged that M&S offers all of their own employees a real living wage, knowing the turnover rates at least for full-time workers would help to build a picture of the positive impact paying a real living wage and whether treating their colleagues well impacts retention rates.

Significant votes (Money Purchase Section) (continued)

L&G Diversified Fund (continued)	
	While the UK is considered a low risk country in terms of human rights abuses, L&G believe having a thorough understanding of the third party contractors that operate in M&S premises will reduce any potential future risks from human rights issues.
Outcome	Failed

L&G Global Equity (70:30) Index Fund	
Company/item	Alphabet – election of a director
Date	6 June 2025
Stewardship priority	Diversity, equity, and inclusion
Vote	Against
Rationale	Alphabet is the holding company of Google and offers a wide range of products and platforms including Google services, Android, Chrome, and YouTube. A vote against was applied to the re-election of a non-independent board director due to the following concerns: - L&G expect a company to have at least one-third of women on the board. - L&G expect a board to be more regularly refreshed and to be diverse by experience, skills, and by gender. - L&G expect the Chair of the Nominations / Governance Committee and the Chair of the Board to have served on the Board for no more than 12 years to maintain independence and a balance of relevant skills, experience, tenure, and background. - The board does not currently comprise of a majority of independent directors. Finally, L&G support the equitable structure of one-share-one-vote, and expect companies to move to a one-share-one-vote structure or provide shareholders a regular vote on the continuation of an unequal capital structure.
Outcome	Passed

Aviva BlackRock UK Equity Index Tracker	
Company/item	Shell - shareholder proposal to request that Shell should disclose whether and how its demand forecast for liquified natural gas (LNG), LNG targets, and new capital expenditure in natural gas assets are consistent with climate commitments.
Date	20 May 2025
Stewardship priority	Climate change
Vote	Against the proposal

Significant votes (Money Purchase Section) (continued)

Aviva BlackRock UK Equity Index Tracker (continued)	
Rationale	On the agenda at Shell's 2025 annual general meeting was a shareholder proposal requesting that Shell publishes various disclosures around its natural gas business relating to climate commitments, including its target to reach net zero emissions by 2050. While BlackRock supports transparency of information for shareholders on climate related issues, they did not vote in favour of the shareholder proposal because in its analysis, Shell's disclosures are already sufficiently robust, allowing investors to understand how it is managing material climate-related risks and opportunities that might impact its long-term financial performance. The shareholder proposal received around 21% support. BlackRock notes that with regard to shareholder proposals addressing climate and natural capital-related risks and opportunities during the year, a significant percentage were overly prescriptive or focused on business risks that companies already had processes in place to address, making them redundant.
Outcome	Failed

Aviva With Profits	
Company/item	Microsoft – Report on risks of operating in countries with significant human rights concerns
Date	5 December 2025
Stewardship priority	Human rights and labour practices
Vote	For the shareholder proposal
Rationale	At Microsoft's annual general meeting, a shareholder proposal requested a comprehensive report on the company's data operations in "human rights hotspots" regarding the risks of operating in countries with significant human rights concerns. The investment manager supported this shareholder proposal. While they appreciated that Microsoft had previously provided disclosure with respect to its approach to operating data centres in countries or regions with human rights challenges, and that its policies and approach continue to evolve, given the significance of this issue, the manager felt that additional reporting would be useful to shareholders. Such disclosures would help shareholders to better understand the financial materiality of any related risks.
Outcome	Failed

Aviva Stewardship	
Company/item	GSK – executive compensation
Date	7 May 2025
Stewardship priority	There were no votes on this fund that align with the Trustees' stewardship priorities. However, this was an key vote on a high profile topic and hence we highlight it here.
Vote	Against the company's proposed executive compensation arrangements
Rationale	This vote reflected the investment manager's ongoing concerns over pay outcomes for the year under review (notably £10,559,000 for the CEO) which the investment manager did not consider to be a fair reflection of performance.

Significant votes (Money Purchase Section) (continued)

Aviva Stewardship (continued)	
	This outcome also resulted in the CEO to Employee pay ratio remaining high at 123:1 (although this is down on the prior year which was 152:1). For example, the CEO's annual bonus award was £2,855,000. The remuneration committee determined that the CEO exceeded her individual objectives (based on innovation, performance, trust and culture). The bonus under this element paid out at 78% out of the 90% maximum and the investment manager noted they are sceptical when non-financial metrics pay out more than the financial targets, particularly in years of underperformance. Further, the Long Term Incentive Plan awards that were granted in 2022 vested at 81% of maximum which was not deemed appropriate. Part of the problem is that 25% of the Long Term Incentive Plan awards vest for the achievement of threshold performance conditions, and based on current grant levels, awards equivalent to 144% of salary will vest for threshold performance which were considered to be excessive.
Outcome	Passed