

Heating and Ventilating Contractors' Association Retirement Benefits Scheme Implementation Statement Year Ending 28 February 2026

Glossary

Investment Adviser	First Actuarial LLP
Scheme	Heating and Ventilating Contractors' Association Retirement Benefits Scheme
Scheme Year	1 March 2025 to 28 February 2026
SIP	Statement of Investment Principles
UNPRI	United Nations Principles for Responsible Investment
DCF	Diversified Credit Funds
LDI	Liability Driven Investment

Introduction

This Implementation Statement reports on the extent to which, over the Scheme Year, the Trustee has followed its policy relating to the exercise of rights (including voting rights) attaching to the Scheme's investments.

In preparing this statement, the Trustee has considered guidance from the Department for Work & Pensions which was updated on 17 June 2022, as well as the expectations set out in the General Code of Practice.

Relevant investments

In previous Implementation Statements, the Trustee has considered the voting records of investment managers used by the Scheme to gain exposure to equity markets.

During the Scheme Year, the Scheme had equity exposure through its investments in the L&G Diversified Fund and two Columbia Threadneedle Equity-Linked Bond Funds. By the end of the period, all of these funds had been fully disinvested and removed from the Scheme's investment strategy. They were replaced with allocations to DCF and LDI funds, neither of which invest in equities.

Because the funds held at the year end contain no equity holdings, there are no associated voting records to review. For the equity-invested funds that were sold during the year, the Trustee is unable to take any action in relation to their historic voting activity, as these funds are no longer held. As a result, the Trustee has not carried out an analysis of investment manager voting records when preparing this Implementation Statement.

The Trustee's policy relating to the exercise of rights

Summary of the policy

The Trustee's policy in relation to the exercise of rights (including voting rights) attaching to the investments is set out in the SIP. The SIP was updated during the Scheme year to reflect changes made to the Scheme's investment strategy, but wording relating to the exercise of rights was not revised. A summary of this wording is as follows:

- The Trustee believes that good stewardship can help create, and preserve, value for companies and markets as a whole and the Trustee wishes to encourage best practice in terms of stewardship.
- The Trustee invests in pooled investment vehicles and therefore accepts that ongoing engagement with the underlying companies (including the exercise of voting rights) will be determined by the investment manager's own policies on such matters.
- When selecting a pooled fund, the Trustee considers, amongst other things, the investment manager's policy in relation to the exercise of the rights (including voting rights) attaching to the investments held within the pooled fund.
- When considering the ongoing suitability of an investment manager, the Trustee (in conjunction with its Investment Adviser) will take account of any particular characteristics of that manager's engagement policy that are deemed to be financially material.
- The Trustee will normally select investment managers who are signatories to the UNPRI.
- If it is identified that a fund's investment manager is not engaging with companies the Trustee may look to replace that fund. However, in the first instance, the Trustee would normally expect its Investment Adviser to raise the Trustee's concerns with the investment manager

Has the policy been followed during the Scheme Year?

The Trustee's opinion is that its policy relating to the exercise of rights (including voting rights) attaching to the investments has been followed during the Scheme Year. In reaching this conclusion, the following points were taken into consideration:

- There has been no change to the Trustee's belief regarding the importance of good stewardship.
- The Scheme's invested assets remained invested in pooled funds over the period.
- None of the new pooled funds selected during the Scheme Year had equity investments.
- All investment managers used by the Scheme are UNPRI signatories.

Conclusion

Since all equity exposure has now been removed from the Scheme, the Trustee has concluded that assessment of the voting records of the manager at the current time would serve no useful purpose. Consequently, no assessment has been undertaken.

The Trustee will continue to assess whether this remains the case and will be mindful of potential managers' voting records should they choose to invest in additional funds in future.

Signed on behalf of the Trustee of the Heating and Ventilating Contractors' Association Retirement Benefits Scheme – 17th September 2026