

Implementation Statement

for

S Grundon Group Pension Fund

Scheme year ended 30 September 2025

Introduction

This Implementation Statement has been prepared by the Trustees of the S Grundon Group Pension Fund (“the Scheme”). The Scheme provides benefits calculated on a defined benefit (DB) basis. The statement:

- sets out how, and to what extent, the policies set out in the Statement of Investment Principles (“the Statement”) have been followed during the year;
- describes any review of the SIP, including an explanation of any changes made; and
- describes the voting behaviour by, or on behalf of, the Trustees over the same period.

This statement excludes any Additional Voluntary Contribution investments held by the Scheme.

Trustees’ overall assessment

In the opinion of the Trustees, the policies as set out in the Statement have been followed for the scheme year ending 30 September 2025. Changes where appropriate to the investment strategy for the DB asset allocation have been considered throughout the scheme year, given the significantly improved scheme funding position. This was largely due to the increase in gilt yields since September 2022, where the scheme liabilities have fallen below the schemes assets. The scheme assets continue to have exposure to equities that have grown in value over the assessment period. The trustees consider this appropriate and within the risk tolerance of the scheme, given the actuarial scheme funding position update. A new Statement of Investment Principles was considered and implemented on the 20th February 2024 and reflected the changes deemed appropriate by the Trustees. This will be reviewed again in 2026.

Review of the Statement

The Trustees’ policies have been developed over time by the Trustees in conjunction with their investment consultant and are reviewed and updated periodically and at least every three years.

The Statement will be reviewed in 2026 following an updated review of the scheme funding position. It will take into account the changes deemed appropriate by the Trustees and Investment Managers with views of the scheme actuary, scheme advisers and sponsoring employer, as well as engagement with scheme members.

Investment objectives

The Trustees’ primary objective for the DB Section is to ensure that the Scheme should be able to meet benefit payments as they fall due. The investment strategy for the Scheme is based on an analysis of its liability profile, the required investment return and the returns expected from the various asset classes. The Trustees review this investment strategy and the asset allocation as part of each triennial actuarial valuation. The Trustees may also review the asset allocation and the investment strategy outside the triennial valuation period where necessary.

The Trustees receive regular investment and funding updates from its actuarial and investment advisers to help monitor progress against these objectives.

Investment Strategy

The Investment Manager invests the Scheme's assets in pooled funds and/or any assets that are considered appropriate having regard to the benchmark and the financial circumstances of the Scheme. Derivative contracts (such as OTC and Market Traded Instruments, Futures, Forwards, Swaps, Options, Forward Rate Agreements, etc.) may be used within the portfolio, or indirectly through collectives, to achieve the Scheme's goals having regard to the benchmark and the possible future relationship between assets and liabilities.

Policies in relation to Investment Manager arrangements

Charges for the investment funds and supplementary services are set by the Investment Manager based on the funds under management. There have been changes to fund benchmarks and investment objectives given the significantly improved scheme funding position. This was largely due to the increase in gilt yields since September 2022, where the scheme liabilities have fallen below the schemes assets. On actuarial and investment advice, a change to a lower risk funding basis has and will continue to be implemented. A new Statement of Investment Principles was considered and implemented on the 20th February 2024 and reflected the changes deemed appropriate by the Trustees.

The performance of the Investment Manager was reviewed and evaluated during the scheme year with the support of the Scheme's Investment Consultant.

Policy in relation to risks

The Trustees consider the main risk to be that of the assets being insufficient to meet the liabilities of the Scheme as they fall due. The Trustees have assessed the likelihood of future undesirable financial outcomes arising in the future.

The Trustees have adopted an asset allocation strategy to constrain the risk of scheme assets being managed outside the investment mandate. Within each asset class, the Investment Manager is expected to maintain a portfolio of securities which ensures that the risk being accepted in each market is broadly diversified.

During the Scheme year ending 30 September 2025 the Trustees received regular investment monitoring reports and are satisfied with the progression of the Scheme's funding position, which is discussed at regular Trustee Meetings.

In addition, the Trustees received assessments of the strength of the Principal Employer from internal and external sources and are satisfied that the employer covenant remains sufficiently strong to meet deficit recovery payments that might arise from time to time.

Environmental, Social & Governance (ESG) Investing

The Trustees of the Scheme share the same values as Grundon Waste Management Limited, the Principal Employer of the Scheme. The Trustees have delegated the ongoing monitoring and management of ESG risks and those related to climate change to the Scheme's Investment Manager on the understanding that it will deliver appropriate investment strategies based on the Trustees' beliefs.

The policies and processes of the Investment Manager were discussed with Trustees during the scheme year to the satisfaction of the Trustees.

Exercise of voting rights

The Trustees have delegated responsibility for the exercise of voting rights attached to the Scheme's Investment Manager which is required to vote according to the best practices laid out in the Financial Reporting Council's UK Stewardship Code. The Investment Manager uses a proxy voting service and obtains voting recommendations from a leading securities analysis company but has the option to vote contrary to recommendations based on its own independent research. The Trustees monitor the Investment Manager's Proxy Voting Policy and are satisfied that the current approach operates in the interests of scheme members. Investment decisions are carefully considered within the context of detailed quantitative and qualitative research, taking into account factors such as the quality of management and board, the audit committee, capital structure, social & environmental issues, and conflicts of interest.

Exercising rights and responsibilities

The Investment Manager is expected to disclose details of its voting behaviour, report on the use of proxy voting advisers, and provide an explanation of votes cast which are the most significant. The Investment Manager considers a significant vote to be one where it holds over 20% of the voting capital of a company.

The Trustees do not carry out a detailed review of the votes cast by or on behalf of their Investment Manager but rely on the requirement for their Investment Manager to provide detailed analysis of its voting behaviour. The Investment Manager did not cast any votes which were deemed to be significant during the scheme year.

The table below provides a summary of voting behaviour over the scheme year:

Fund name	Courtiers Total Return Cautious Risk Fund	Courtiers Total Return Balanced Risk Fund
Value of Scheme assets as at 30 September 2025 ¹	£12.82m	£12.41m
Number of meetings eligible to vote at	67	67
Number of resolutions eligible to vote on	852	852
% of resolutions voted	100.00%	100.00%
% voted with management	80.68%	80.68%
% voted against management	19.32%	19.32%
% abstained from voting	0%	0%
% of meetings with at least one vote against management	55.22%	55.22%
% of resolutions voted contrary to recommendation of proxy adviser	1.60%	1.60%

The Trustees are satisfied that the Investment Manager has fully exercised its voting rights on behalf of the Trustees and scheme members during the scheme year.

Signed for and on behalf of the Trustees by Derek Steggall, Chair to the Board of Trustees

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