

General Mills UK Pension Plan (“the Plan”)

Implementation statement for the year to 5 April 2025

Introduction

This Implementation Statement has been prepared by the Trustee of the **General Mills UK Pension Plan** (“the Plan”) in accordance with the requirements of the Occupational Pension Schemes (Investment) Regulations 2005 (as amended). Its purpose is to:

- Set out how, and the extent to which, the policies in the Statement of Investment Principles (SIP) have been followed during the year;
- Describe any review of the SIP during the year and any changes made;
- Provide information about the voting behaviour by or on behalf of the Trustee, including the most significant votes cast and the use of proxy voting services.

SIP Review

- The SIP was last reviewed and updated in **February 2025**.
- The changes made during the year included updates in relation to:
 - Removing reference to the Defined Contribution section of the Plan, which was formally closed with a Deed of Termination being signed on 27 October 2023 by the Trustee and Company.
 - The LDI hedge design which is currently in the process of being reviewed and is set to be updated in the first half of 2025 with the aim of hedging 95% of the Plan’s Liabilities, valued on a gilts-flat basis (up from 87% previously).
- The SIP reflects the Trustee’s investment beliefs and policies, including those on environmental, social and governance (ESG) considerations.

Adherence to the SIP

Due to the changes in the SIP occurring toward the end of the reporting year (in February 2025), the adherence has been considered relative to the previous strategy. The Trustee is satisfied that during the Plan year:

- The Plan’s investment policies and strategy were broadly implemented as intended, with the strategy being reviewed during the year and remaining unchanged.
- No new asset managers were selected or appointed, but they were monitored in line with the Trustee’s policies;
- ESG and stewardship matters were considered in accordance with the policies in the SIP.

Following the reporting period, the Plan amended its operating model to enhance the delegation of collateral management. This change was implemented to better support the Plan’s objectives. The enhanced delegation has improved adherence to the Plan’s collateral management policy by strengthening oversight and alignment with the Plan’s risk management and investment strategies.

Voting and Engagement

The Plan's assets are invested in pooled funds managed by external investment managers. The Trustee delegates voting and engagement activities to these managers, in line with the stewardship policy set out in the SIP.

Most of the Plan's assets are invested in the liability-driven investment (LDI) portfolio which consists of fixed income and derivatives. Due to the nature of these assets, there were no voting opportunities in the LDI portfolio during the year to 5 April 2025. Therefore, the sections below focus on the remaining assets where voting rights are held, specifically, on the equity investments in the Diversified Fund managed by Legal & General Investment Management (LGIM).

The Trustee delegates voting responsibilities to investment managers, who are selected for their robust stewardship and voting policies aligned with the Plan's ESG priorities, including climate risk, governance standards, and long-term value creation. The Trustee reviews these policies during the manager selection process and periodic monitoring to ensure readiness for voting if the Plan's asset allocation changes. Managers are expected to use proxy voting, with decisions reflecting the Plan's commitment to net zero by 2050 and other ESG objectives.

The Trustee will annually assess whether changes in asset allocation introduce voting opportunities and ensure stewardship policies remain fit for purpose.

LGIM - Diversified Fund

Voting Activity

The Trustee delegates voting rights attached to investments in the Legal & General Diversified Fund to the underlying investment manager, LGIM. LGIM exercises these rights in accordance with its own stewardship policy and voting principles, which align with the Trustee's expectations of responsible investment behaviour.

Over the year to 31 March 2025:

- LGIM was eligible to vote at 6,616 meetings, covering 62,436 resolutions;
 - It voted on 99.81% of those resolutions;
- Of the votes cast:
 - 19.09% were against management;
 - 1.55% were abstentions;
 - 10.06% were contrary to proxy adviser recommendations;
- In 58.64% of meetings, LGIM voted at least once against management.

These statistics reflect LGIM's commitment to holding companies accountable on material ESG and governance issues through an active and outcomes-driven voting approach.

Most Significant Votes

The Trustee has asked LGIM to report on the most significant votes cast on their behalf. A selection is summarised below:

Company	Resolution	Vote	Rationale	Date of Vote	Vote Outcome
Prologis, Inc.	1a: Elect Director Hamid R. Moghadam	Against	LGIM expects companies to separate the roles of Chair and CEO due to risk management and oversight concerns.	09/05/2024	N/A
Microsoft Corporation	9. Report on AI Data Sourcing Accountability	For	LGIM supported the shareholder proposal due to growing investor concern over how companies train large language models using third-party data. Greater attention to data sourcing and AI governance was seen as essential.	10/12/2024	Fail
NextEra Energy, Inc.	1f: Elect Director John W. Ketchum	Against	LGIM expects companies to separate the roles of Chair and CEO due to risk management and oversight concerns.	23/05/2024	N/A
Shell plc	22: Approve the Shell Energy Transition Strategy	Against	LGIM voted against due to insufficient ambition in Shell's climate strategy. Concerns included the company's dependency on offsets, slow progress on renewable investment, and insufficient disclosures to demonstrate alignment with net zero goals.	21/05/2024	Pass
Toyota Motor Corp.	1.1: Elect Director Toyoda, Akio	Against	LGIM opposed due to independence concerns. The board lacks sufficient independent directors and LGIM expects separation of Chair and CEO roles. LGIM also raised concerns about the company's lobbying practices and insufficient action on climate issues.	18/06/2024	N/A
Tencent Holdings Ltd	3a: Elect Charles St Leger Searle as Director	Against	Audit Committee: Voted against due to lack of independent directors. Climate Impact Pledge: Voted against as company does not meet LGIM's minimum climate standards.	14/05/2024	Pass
BHP Group Ltd	13: Approve Climate Transition Plan	For	LGIM supported the plan as BHP made meaningful updates, including clearer interim targets, decarbonization pathways, and an enhanced link to executive remuneration. However, LGIM will continue to monitor BP's alignment with long-term climate goals.	30/10/2024	N/A
National Grid Plc	17: Approve Climate Transition Plan	For	LGIM voted in favour of the plan, commending the company's commitment to net-zero emissions. LGIM appreciated the clarity in the 'Delivering for 2035' report and welcomed National Grid's engagement with SBTi on heating decarbonisation.	10/07/2024	Pass
Apollo Global Management	1.1: Elect Director A.B. Konrad	Against	LGIM opposed based on board diversity concerns. LGIM expects a company to have at least one third women on the board.	24/06/2024	Pass
Amazon.com, Inc.	6. Report on Customer Due Diligence	For	LGIM voted in favour of enhanced transparency on material human rights risks, which remains insufficient despite some internal and third-party reviews.	22/05/2024	N/A
Nestlé SA	7: Report on Non-Financial Matters Regarding Sales of Healthier and Less Healthy Foods	For	LGIM voted for the shareholder proposal focused on improving nutrition disclosure. As a co-filer, LGIM called for more effective targets to increase availability of healthier food choices, citing links between poor diets and chronic conditions like obesity, diabetes, and heart disease. These health issues have economic consequences through increased healthcare costs and reduced productivity. LGIM believes Nestlé should set an industry example by raising standards and promoting positive change.	18/04/2024	N/A
Unilever Plc	4: Approve Climate Transition Action Plan	For	LGIM voted for the plan, as it meets their minimum expectations. This includes disclosure of Scope 1, 2, and material Scope 3 GHG emissions, and emissions reduction targets aligned with a 1.5°C Paris goal. Although SBTi recently removed its approval of Unilever's long-term Scope 3 target, the company has submitted new near-term 1.5°C-aligned targets for validation. LGIM deems the ambition level adequate and remains supportive of Unilever's net-zero trajectory.	01/05/2024	Pass
Simon Property Group, Inc.	1A: Elect Director David Simon	Against	LGIM opposed due to the combination of Chair and CEO roles, which it views as a governance risk. The lack of independent board leadership influenced the vote.	08/05/2024	Pass

Engagement Approach

The Trustee recognises engagement as a critical tool in driving long-term value and responsible behaviour within investee companies. Direct engagement is delegated to investment managers, and the Trustee monitors engagement outcomes via ESG reporting and manager meetings.

Over the year to 31 March 2025, LGIM undertook:

- 2,411 total engagements, with 1,651 unique companies;
 - Covering 55% of eligible fund value and 32% of fund market cap.
- Which were categorised as follows:

Category	Number of engagements
Environmental issues	1,791
Social issues	478
Governance topics	268
Other topics (e.g. financial and strategic themes)	149

The top five engagement themes included:

- Climate Impact Pledge (1,447 engagements);
- Human Rights (315);
- Deforestation (154);
- Climate Change (145);
- Corporate Strategy (126).

Engagement Example

A notable engagement during the year involved LGIM's **Climate Impact Pledge**, which targets companies that are critical to the climate transition. One of LGIM's engagements focused on a high-emitting utilities company in the US. LGIM engaged on board accountability, climate risk disclosure, and net zero alignment. Following sustained pressure, the company committed to enhanced emissions disclosures and introduced a climate oversight committee at board level.

The Trustee is satisfied that LGIM's voting and engagement activity during the year was robust, outcomes-focused, and aligned with the Trustee's ESG and stewardship objectives. The Trustee will continue to monitor engagement outputs, including significant votes and climate-related activity, to ensure the Plan's stewardship policies are effectively implemented.

Conclusion

The Trustee believes that the policies set out in the SIP have been adhered to during the Plan year. The Trustee continues to develop their understanding and oversight of responsible investment and stewardship matters.

This statement will be made available on the Plan's website: <https://weareigg.com/client-docs/general-mills/>

Signed: Agreed by the Trustee

On behalf of the Trustee of the General Mills UK Pension Plan

Date: 7 August 2025