EA Technology Group of the ESPS

Engagement Policy Implementation Statement

31 March 2026

1. Introduction

Under the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019, the Trustee is required to produce an annual Engagement Policy Implementation Statement ("EPIS"). This statement outlines how, and the extent to which, the policies relating to stewardship, voting and engagement as outlined in the Statement of Investment Principles ("SIP") have been followed.

This statement covers the Group's accounting year to 31 March 2026. It is intended to meet the updated regulations and will be included in the Group's Report & Accounts. In preparing this statement, the Trustee has taken advice from their professional advisers.

This statement sets out the stewardship-related activity undertaken during the period by the Trustee and the Manager, and records the Trustee's assessment of that activity

2. Policies

The Trustee's relevant policies regarding stewardship, voting and engagement are outlined in the SIP. The most recent version of the SIP is publicly available online and is updated from time to time

The Trustee appointed BlackRock as the adviser and Fiduciary Manager ("the Manager") for the Group. The Trustee retains responsibility for the strategic investment objective and oversight of the Manager.

Following the completion of the bulk annuity transaction, the Scheme moved to buy-in and most of the assets were sold in April 2025, with cash transferred to the insurer. As a result, the assets held during the year to 31 March 2026 were residual in nature.

3. Scope of this statement

The Trustee acknowledges that the extent to which the policies in relation to stewardship, voting and engagement can be applied varies across the portfolio. In general, voting rights are not attached to cash and liquidity holdings, and the applicability of stewardship activity to the residual assets is correspondingly limited.

During the year to 31 March 2026, the Group's remaining asset exposure was limited to a holding in the BlackRock ICS liquidity fund and the Bentall Greenoak Real Estate Debt Fund. As there were no equity holdings over the period, voting statistics are not applicable to this Statement.

4. Group activity

The SIP includes the Trustee's policy on Environmental, Social and Governance ("ESG") factors and stewardship. This policy sets out the Trustee's beliefs on ESG and the processes followed by the Trustee in relation to voting rights and stewardship. The Trustee purchased a buy-in policy with Just Retirement ("the Insurer") at the beginning of April 2025. The Group's residual assets consist of a closed-ended alternative fund and a small sum of cash held with the Manager and/or in the Trustee Bank Account, therefore the Trustee does not consider ESG considerations to be a material risk over the time horizon of the Group. The Trustee considered ESG risks when selecting their bulk annuity provider and appointing the Insurer.

Given that the Group had moved to buy-in and most assets had already been sold in April 2025, the applicability of stewardship over the period was very limited. The Trustee's commentary for the year is limited to the residual BlackRock ICS liquidity holding

5. Stewardship and Engagement

The Trustee has delegated to the Manager the responsibility of monitoring the residual BlackRock holding and confirming that it remains appropriate in the context of the Group's residual asset profile. The Trustee is comfortable that, under the governance structure of the Group, responsibility sits with the Manager to provide information where relevant.

No voting activity was undertaken during the year. This statement does not disclose stewardship information due the limited materiality and applicability of stewardship activities to the assets held over the period

6. Concluding remarks

Following completion of the bulk annuity transaction, most of the Group's assets were sold in April 2025 and the proceeds transferred to the insurer. Accordingly, the assets held during the year to 31 March 2026 were residual in nature, and the scope for stewardship activity was correspondingly limited.

The Group's remaining BlackRock exposure during the period was limited to a holding in the BlackRock ICS liquidity fund and the Bentall Greenoak Real Estate Debt Fund. As there were no equity holdings during the year, voting statistics are not applicable to this statement.

The Trustee considers that the stewardship-related policies set out in the Statement of Investment Principles have been followed to the extent relevant to the assets held over the period and that the commentary included in this statement is appropriate having regard to the Group's residual asset position.