UK SHELL PENSION PLAN

Annual Report of the Trustee

and

Financial Statements for the Year Ended

31 December 2025

Plan Registration No: 12007000

Contents

Trustee and Advisors

Trustee:	UK Shell Pension Plan Trust Limited
Registered Office:	Shell Centre, London SE1 7NA

Company Nominated Directors (CNDs) during the year ended 31 December 2025 and to the date of this report (except as noted):

Mr P Kohli	Chair
Mr A Howard	Resigned 1 November 2025
Ms C Pantling	Appointed 1 November 2025
Mr B Kotecha	

Member Nominated Directors (MNDs) during the year ended 31 December 2025 and to the date of this report:

Ms E Powell	Resigned 6 October 2025
Ms J George	Appointed 1 November 2025
Mr P Coupe	Appointed 1 November 2025
Mr S Critchlow	

Secretary to the Trustee Company:	Ms D Livingstone, Communications Adviser Trustee Services Unit, Shell International Limited, Shell Centre, London SE1 7NA
Independent Auditor:	Ernst & Young LLP, G1, 5 George Square, Glasgow, G2 1DY
Legal Advisors:	Shell International Limited, Shell Centre, London, SE1 7NA Sackers & Partners LLP, 20 Gresham Street, London, EC2 7JE
Investment Manager:	FIL Life Insurance Ltd ('Fidelity'), Windmill Court, Millfield Lane, Lower Kingswood, Tadworth, Surrey, KT20 6RP
Investment Advisor:	Aon Consulting, The Aon Centre, The Leadenhall Building, 13th Floor, 122 Leadenhall Street, London EC3V 4AN
Bankers:	Citibank NA London, 25 Canada Square, Canary Wharf, London E14 5LB, UK
Name and address for enquiries:	The day to day administration of the Plan is under the control of FIL Life Insurance Ltd ('Fidelity'). Contact details for general enquiries about the Plan and individual enquiries regarding entitlement are as follows:

Website:	www.fidelitypensions.co.uk
Email:	pensions.service@fil.com
Telephone:	0800 3 68 68 69 (UK only), (+44) 1737 838585 (outside of the UK)
Address:	Fidelity Investment Management Ltd, Kingswood Fields, Millfield, Lower Kingswood, Tadworth, Surrey, KT20 6RP

Report of the Trustee

Introduction

The Trustee presents the following annual report of the UK Shell Pension Plan ("the Plan") covering the year 2025, together with the financial statements and supporting schedules for the year ended 31 December 2025.

Constitution

The Plan is governed by a Trust Deed and Rules dated 29 January 2013 and is a defined contribution plan providing benefits for employees and former employees of the Principal Employer (Shell International Limited) and Participating Employers. The Plan is registered under the Finance Act 2004.

Management of the Plan

The UK Shell Pension Plan Trust Limited ("UKSPPTL") has been appointed as the sole corporate Trustee of the Plan.

In accordance with the requirements of the Pensions Act 2004, three of the Directors of UKSPPTL (CNDs) are appointed by The Shell Petroleum Company representing the sponsoring employers and three of the Directors (MNDs) are appointed using a member nomination and selection panel process. Members can nominate themselves as candidates and are then selected by a panel.

Trustee Board Attendance Record

The Directors had four scheduled and one adhoc Board meeting during the year. A summary of the Board Meeting attendance record for 2025 is shown in the table below.

Trustees/Directors	Board Meetings
P Coupe	1/1
S Critchlow	4/5
J George	1/1
A Howard	4/4
P Kohli	5/5
B Kotecha	5/5
C Pantling	1/1
E Powell	3/4

A/T = number of meetings attended/total number of meetings possible to attend.

E Powell resigned on 6 October 2025, she attended 3 out of 4 Board meetings.
A Howard resigned on 1 November 2025, he attended 4 out of 4 Board meetings.

P Coupe, J George and C Pantling were appointed on 1 November 2025, they attended 1 out of 1 Board meetings.

Risk Assessment

The Trustee is responsible for risk management for the Plan and for the underlying controls mitigating identified risks. A Risk Register is in place, which is updated on a regular basis in response to changes in the global pension environment and to the Plan in particular. The risk management process is designed to manage, rather than to eliminate, the risk of error, loss or failure to comply with regulatory requirements.

Trust Deed and Rules

There were no amendments made during 2025 to the Trust Deed of the Plan.

Plan Membership

Details of the current membership of the Plan are given below:

	Employed Members	Deferred Members	Total Members
Members at 31 December 2024	3,920	1,895	5,815
Timing Adjustment*	(3)	16	13
Plus New Entrants	432	-	432
Less Leavers with deferred benefits	(855)	859	4
Less No Liability:			
Retirements	-	(9)	(9)
Deaths/Ceased	(5)	(1)	(6)
Leavers/Opt outs (refunds)	(61)	-	(61)
Leavers/Opt outs (No Contributions)	(32)	-	(32)
Transfers-out	-	(127)	(127)
Members at 31 December 2025	3,396	2,633	6,029

*These are system updates made to a member's status with an effective date within the previous reporting period but processed by Fidelity outside of the reporting period.

Conflicts of Interest and Duty

There is a Protocol on Conflicts of Interests and Duty for the Trustee, as well as a Conflicts of Interest Register.

Participating Employers of the Plan

As at 31 December 2025, the UK Shell Pension Plan had 94 participating employers. The following participating employers were added in the year.

Shell España, S.A
Shell (China) Projects & Technology Limited
Shell Energy (China) Limited
Shell Iraq Services B.V.

Member Communications

Fidelity offers a comprehensive website, PlanViewer, where all members can access their personal account and Plan information online.
Members can request copies of the Trust Deed and Rules of the Plan. Additionally, UK Shell Pension Plan explanatory booklets, such as "Your Plan Explained," "Your Contributions Explained," and "Your Investment Choices," are provided to members upon joining and are also accessible via PlanViewer.
Fidelity communicates with members throughout their journey with the Plan. Members receive welcome emails when they join, informative emails when they leave the Plan, and educational messages about retirement options for those aged 54 and over. Throughout the year, Fidelity also sends ad hoc emails to remind members to log in to PlanViewer, review their account, or complete an expression of wish form.
The Annual Report and Financial Statements are available on PlanViewer, and the Statement of Investment Principles is published on the Plan's website.

An annual newsletter is also sent to members in Q1 which provides them with Plan information and pension news.

Employed members of the Plan have access to the Shell Benefits and Reward site "Benify" to increase or decrease their contribution rate, make AVCs or opt in or out of Salary Sacrifice.

Data Protection

The Trustee is registered under the Data Protection Act 1998 to hold information necessary for the management of the Plan and has updated its data protection compliance in line with the General Data Protection Regulation and the Data Protection Act 2018 and adopted a data protection policy.

Financial Development of the Plan

The financial statements have been prepared and audited in accordance with regulations made under sections 41(1) and (6) of the Pensions Act 1995.

Normal contributions were received on a monthly basis and were payable in accordance with the Payment Schedule.

Members of the plan are divided into Category A, who can participate in the salary sacrifice arrangement and Category B and C, who are not eligible to become salary sacrifice pension members.

<u>Category A Members</u>

Employees who participate in the salary sacrifice arrangement make no contributions to the Plan. Indirect contributions are made via salary sacrifice. For employees who participate in the salary sacrifice arrangement the employer contributions are 20% or 27.5%. These rates include the element relating to the employees' indirect contributions.

Employees who do not participate in the salary sacrifice arrangement contribute 5% or 7.5% of pensionable salary (depending on their choice) and for these employees the employers contribute 15% or 20% respectively.

<u>Category B Members</u>

Employees contribute 5% of pensionable salary and for these employees the employers contribute 4%.

Category C Members

The employee contribution rate is 5% based on their Qualifying Earnings and for these employees the employers contribute 3%.

The financial development of the Plan during the year is shown below:

	£'000
Contributions and other receipts	106,563
Benefits paid and other expenses	(27,539)
Net additions from dealings with members	79,024
Net returns on investments	123,012
Net assets at start of year	688,520
Net assets at end of year	890,556

External Factors Impacting the Plan

Plan assets are invested in a diversified range of global funds and are exposed to volatility from global markets and local events. The Trustee actively monitors developments which could impact Plan assets.

In February 2026 the US led strikes on Iran resulting in a high intensity regional conflict involving direct military engagement and rapid escalation. This has had no immediate impact on the Plan or the Sponsors' ability to fund payments. The Directors will continuing to monitor the situation throughout 2026.

Investment Management

The Plan's investments are held through an investment platform with FIL Life Insurance Limited ('Fidelity'), part of Fidelity Worldwide Investments. This arrangement allows a range of investment funds and managers to be offered to the Plan membership under the overall management of Fidelity.

An Investment Strategy Review was conducted in 2024. The implementation of the outcome from this review took place in the second quarter of 2025.

The Default Fund

In May 2025, the Drawdown Lifestyle (together with the annuity and cash lifestyle) was closed, and all members' pension accounts that were invested in the Lifestyle arrangements were transferred to the new default investment option – "FutureWise" (a Target Date Fund). The Fund Switch began on 29 May 2025 and completed on 20 June 2025.

The Self Select Funds

In May 2025, some of the funds that had been less popular or had underperformed were removed. The following Self Select Funds were removed:

- BlackRock Over 5 Years Index-Linked Gilt Fund
- BlackRock Aquila Life Market Advantage Fund
- BlackRock Absolute Return Bond Fund
- RBC Global Focus Equity Fund

The following Self Select Funds were introduced in Q4 2024:

- Nordea Global Climate & Environment Fund
- M&G Total Return Credit Fund
- HSBC Global Sukuk Bond Fund

Statement of Investment Principles

In accordance with section 35 of the Pensions Act 1995, the Trustee has produced a Statement of Investment Principles.

The Statement is required by law and summarises how the Trustee:

- sets the investment policy and chooses the most suitable types of investments for the Plan;
- delegates buying and selling investments to the Plan's investment managers;
- monitors the investment managers and the performance of the Plan's investments.

The Statement includes a section on social, environmental and ethical considerations.

The Statement of Investment Principles for the Default Option can be found on page 29 of this report. Copies of the full Statement of Investment Principles are available on request from the Secretary to the Trustee at the address on page 2 of this report or can be found on the Shell pensions website https://pensions.shell.co.uk/pension-plan.html.

Custody

Investment in pooled funds gives the Trustee rights to the cash value of the units rather than to the underlying assets. The underlying investment manager of each of the pooled funds is responsible for that appointment and monitoring of the custodian of the fund's assets.

Marketability of Investments

At the year end investments are considered to be marketable on a short-term basis.

Review of Investment Performance

The performance of the Investment Manager is compared with benchmarks in the report from Fidelity contained on page 13 of this report.

Employer-related Investments

Details of employer-related investments are given in Note 17 to the Financial Statements.

Statement of Trustee's Responsibilities

The financial statements, which are prepared in accordance with UK Generally Accepted Accounting Practice, including the Financial Reporting Standard applicable in the UK (FRS 102) are the responsibility of the Trustee. Pension scheme regulations require, and the Trustee is responsible for ensuring, that those financial statements:

- show a true and fair view of the financial transactions of the Plan during the Plan year and of the amount and disposition at the end of the Plan year of its assets and liabilities, other than liabilities to pay pensions and benefits after the end of the Plan year; and

- contain the information specified in Regulation 3A of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, including making a statement whether the financial statements have been prepared in accordance with the relevant financial reporting framework applicable to occupational pension schemes.

In discharging the above responsibilities, the Trustee is responsible for selecting suitable accounting policies, to be applied consistently, making any estimates and judgments on a prudent and reasonable basis, and for the preparation of the financial statements on a going concern basis unless it is inappropriate to presume that the Plan will not be wound up.

The Trustee is also responsible for making available certain other information about the Plan in the form of an annual report. The Trustee also has a general responsibility for ensuring that adequate accounting records are kept and for taking such steps as are reasonably open to it to safeguard the assets of the Plan and to prevent and detect fraud and other irregularities, including the maintenance of an appropriate system of internal control.

The Trustee is responsible under pensions legislation for securing that a Payment Schedule is prepared, maintained and from time to time revised showing the rates of contributions payable towards the Plan by or on behalf of the employer and the active members of the Plan and the dates on or before which such contributions are to be paid.

The Trustee is also responsible for keeping records in respect of contributions received in respect of any active member of the Plan and for adopting risk-based processes to monitor whether contributions are made to the Plan by the employer in accordance with the Payment Schedule.

Where breaches of the schedule occur, the Trustee is required by the Pensions Acts 1995 and 2004 to consider making reports to The Pensions Regulator and the members.

For: UK Shell Pension Plan Trust Limited

Director DocuSigned by:
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Director DocuSigned by:
Parminder Kohli
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Date: Jul 23, 2026 and Jul 24, 2026

Investment report

The Plan holds units in the following funds, supported by the Fidelity Platform, in accordance with the provisions of a policy with FIL Life Insurance Limited.
The distribution of the Plan's assets as at 31 December 2025 is shown below.

Fund Name	Value £'000	2025 %	2024 %
Target Date default funds			
FutureWise Target 2045 - Class 3	158,929	17.8%	n/a
FutureWise Target 2050 - Class 3	154,441	17.3%	n/a
FutureWise Target 2040 - Class 3	130,949	14.7%	n/a
FutureWise Target 2055 - Class 3	117,039	13.1%	n/a
FutureWise Target 2035 - Class 3	102,739	11.5%	n/a
FutureWise Target 2060 - Class 3	76,147	8.5%	n/a
FutureWise Target 2030 - Class 3	55,885	6.3%	n/a
FutureWise Target 2025 - Class 3	19,388	2.2%	n/a
FutureWise Target 2065 - Class 3	13,743	1.5%	n/a
FutureWise Retirement Fund - Class 3	3,135	0.4%	n/a
FutureWise Target 2070 - Class 3	1,207	0.1%	n/a
Funds that make up the Lifestyle Strategies			
Growth Fund	0	0.0%	87.4%
Transition Fund	0	0.0%	3.5%
Pre-Retirement Fund	0	0.0%	2.4%
Pension Annuity Fund	0	0.0%	0.2%
Cash Fund	0	0.0%	0.2%
Self Select Funds			
BlackRock World (ex-UK) Equity Index Fund	19,768	2.2%	2.1%
HSBC Islamic Global Equity Index Fund	16,425	1.8%	2.0%
BlackRock Cash Fund	6,276	0.7%	0.5%
Mellon Long Term Global Equity Fund	4,095	0.5%	0.5%
BlackRock Emerging Markets Index Fund	3,758	0.4%	0.2%
BlackRock UK Equity Index Fund	3,074	0.3%	0.4%
BlackRock ACS World Multifactor ESG Equity Tracker Fund	1,829	0.2%	0.3%
Threadneedle Property Fund	829	0.1%	0.1%
M&G Total Return Credit Fund	691	0.1%	0.0%*
HSBC Global Sukuk Bond Fund	169	0.0%*	0.0%*
Fidelity Pension Annuity Fund	86	0.0%*	0.0%*
Nordea Global Climate & Environment Fund	24	0.0%*	n/a
RBC Global Focus Equity Fund	0	0.0%	0.1%
BlackRock Aquila Life Market Advantage Fund	0	0.0%	0.1%
BlackRock Absolute Return Bond Fund	0	0.0%	0.0%*
BlackRock Over 5 Years Index Linked Gilt Fund	0	0.0%	0.0%*
	890,626	100.0%	100.0%

* investments are shown as having 0.0% holdings due to rounding therefore total of individual numbers may to agree to total

Lifestyle Strategies (in place until 20 June 2025)

There were three Lifestyle strategies available in the Plan:

1. The Drawdown Lifestyle (default)
2. The Annuity Lifestyle
3. The Cash Lifestyle

Drawdown Lifestyle (Default)
Members' funds were gradually switched between the following as retirement approached:

- Growth Fund
- Transition Fund
- Pre Retirement Fund

Annuity Lifestyle
Funds were switched between the following as retirement approached:

- Growth Fund
- Transition Fund
- Pre Retirement Fund
- Pension Annuity Fund
- Cash Fund

Cash Lifestyle
Funds were switched between the following as retirement approached:

- Growth Fund
- Transition Fund
- Pre Retirement Fund
- Cash Fund

Investment Strategy Effective From 20 June 2025

Following a strategic review and after taking professional advice from Aon, the Trustee implemented a new default investment arrangement from 20 June 2025.

Default Arrangement –FutureWise - Target Date Funds

From 20 June 2025, the default investment strategy is "FutureWise", which uses Target Date Funds (TDFs). Members who do not make an active investment choice are automatically placed into the TDF aligned to their expected retirement year.
The Trustee remains responsible for the default strategy and reviews it regularly, taking into account risk, value for members, expected outcomes, and the characteristics of the Plan's membership.

Overview of the FutureWise Approach

The FutureWise strategy automatically adjusts the investment mix over time, transitioning from higher risk growth seeking assets to a more diversified and lower volatility portfolio as members approach retirement.

Growth Phase
- Primarily invested in global equities and other return seeking assets.
- Managed against a target of CPI + 4% p.a.
- Fidelity intends to build up a 15% allocation to private markets in the early years; this will be phased in over a three year period beginning in 2025.

Transition Phase
- As members near their target retirement date, assets are gradually shifted to a more diversified mix.
- Returns are no longer targeted relative to inflation.
- Focus is on smoother long term capital growth and reduced volatility.

FutureWise Retirement Fund

- For members who remain invested past their target retirement date, they will transitioned into the Fidelity FutureWise Retirement Fund. This fund is designed to achieve an investment return that allows members to withdraw approximately 3.5-4% per year without reducing their capital.
- This aims to provide long term inflation protection while supporting sustainable income during retirement.

A comparison of performance against agreed benchmarks for the year ending 31 December 2025 is shown on the next page.

Compliance with the Statement of Investment Principles

The Trustee confirms that the Plan's investment arrangements have been implemented in accordance with the Statement of Investment Principles ("SIP").
The Trustee has established processes to ensure that:

- Alignment with policies (including ESG): Investment managers' strategies and decisions are monitored to ensure alignment with the Trustee's policies, including consideration of ESG factors where financially material.
- Long-term decision making and engagement: Investment managers are expected to assess investments over the medium to long term and to engage with investee companies where appropriate to support long-term value creation.
- Performance assessment and remuneration: Investment managers are evaluated against appropriate benchmarks over relevant time horizons, with a focus on long-term outcomes.
- Costs and portfolio turnover: The Trustee monitors investment costs, including portfolio turnover costs (being the costs of buying and selling securities), on a regular basis and considers these in the context of overall value for members.
- Duration of arrangements: Investment managers are appointed on an ongoing basis with no fixed term and are subject to periodic review, at least every three years, with the ability to replace managers where appropriate.

Summary

Investment markets experienced generally positive performance during the year, although returns varied across asset classes and regions. The Trustee reviewed the performance of the Plan's investment arrangements against relevant benchmarks and objectives, taking account of prevailing market conditions. Overall, the majority of the Plan's investment funds performed broadly in line with expectations, reflecting their respective investment strategies and benchmark indices. Where performance was below expectations, this was reviewed with the investment adviser as part of the Trustee's ongoing governance and monitoring framework. The Trustee remains satisfied that the Plan's investment arrangements continue to support members' long-term retirement outcomes.

The Trustee considers that the investment strategy remains appropriate for the membership and that the arrangements with investment managers are consistent with the Trustee's policies, including the delivery of long-term value for members.
The Trustee will continue to monitor performance and review the investment strategy on a regular basis.

Performance – Fidelity

Fund Name and Agreed Benchmark	2025 %		3 Yearly (% p.a.)		5 Yearly (% p.a.)	
	Portfolio	Benchmark	Portfolio	Benchmark	Portfolio	Benchmark
BlackRock World (ex-UK) Equity Index Fund	14.0	14.0	17.6	17.9	12.6	12.8
HSBC Islamic Global Equity Index Fund	12.4	13.0	22.9	23.1	14.8	15.0
BlackRock Cash Fund	4.3	4.2	4.7	4.6	3.0	3.0
Mellon Long Term Global Equity Fund	1.5	12.8	8.4	16.4	6.6	11.7
BlackRock Emerging Markets Index Fund	23.4	23.5	11.5	12.1	n/a	n/a
BlackRock UK Equity Index Fund	20.1	20.7	11.5	11.7	10.2	10.4
BlackRock ACS World Multifactor ESG Equity Tracker Fund	16.2	15.9	14.4	14.1	n/a	n/a
Threadneedle Property Fund	5.2	n/a	3.3	n/a	3.7	n/a
Fidelity Pension Annuity Fund	5.4	5.9	2.7	3.1	-4.9	-4.7
Nordea Global Climate & Environment Fund[1]	n/a	n/a	n/a	n/a	n/a	n/a
HSBC Global Sukuk Bond Fund	-0.3	0.2	n/a	n/a	n/a	n/a
M&G Total Return Credit Fund	4.7	4.2	n/a	n/a	n/a	n/a

Figures may be affected by rounding. Returns quoted gross of fees, except Threadneedle Property Fund, and annualised for periods more than one year. Performance for Lifestyle Strategies provided by Fidelity on Dealing NAV basis. Self-select funds' performance figures sourced from underlying managers.
[1] Nordea fund was invested in after the start of 2025 hence a 1-year performance figure is not available and is therefore shown as "n/a"

Performance is calculated on a Net Asset Value basis, net of fees.
Future Wise Target Date Funds were introduced to the Plan in 2025. Therefore, no comparative performance data is presented for the Plan year.

Some funds are designed to track their benchmark whilst others are designed to out-perform their benchmark (but as a result also carry a risk of underperforming against the benchmark). The performance target for each fund can be found on the PlanViewer website.

Detailed quarterly investment review reports are available for members to access on the PlanViewer website.

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Director DocuSigned by: Parminder Kohli EED0B75ED0EF49E...

Date: Jul 23, 2026 and Jul 24, 2026

Independent Auditor's report to the Trustee of the UK Shell Pension Plan

Opinion

We have audited the financial statements of the UK Shell Pension Plan for the year ended 31 December 2025 which comprise the Fund Account, the Statement of Net Assets available for benefits and the related notes 1 to 19, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including FRS 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland' (United Kingdom Generally Accepted Accounting Practice).

In our opinion, the financial statements:

- give a true and fair view of the financial transactions of the Plan during the year ended 31 December 2025, and of the amount and disposition at that date of its assets and liabilities, other than liabilities to pay pensions and benefits after the end of the year;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- contain the information specified in Regulation 3A of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, made under the Pensions Act 1995.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report. We are independent of the Plan in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

In auditing the financial statements, we have concluded that the Trustee's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Plan's ability to continue as a going concern for a period of 12 months from when the Plan's financial statements are authorised for issue.

Our responsibilities and the responsibilities of the Trustee with respect to going concern are described in the relevant sections of this report. However, because not all future events or conditions can be predicted, this statement is not a guarantee as to the Plan's ability to continue as a going concern.

Other information

The other information comprises the information included in the annual report, other than the financial statements, our auditor's report thereon and our auditor's statement about contributions. The Trustee is responsible for the other information contained within the annual report.

Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in this report, we do not express any form of assurance conclusion thereon.

Our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the course of the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work we have performed, we conclude that there is a material misstatement of the other information, we are required to report that fact.

We have nothing to report in this regard.

Responsibilities of the Trustee

As explained more fully in the Trustee's responsibilities statement set out on page 9, the Trustee is responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the Trustee determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements the Trustee is responsible for assessing the Plan's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Trustee either intends to wind up the Plan or to cease operations, or has no realistic alternative but to do so.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Explanation as to what extent the audit was considered capable of detecting irregularities, including fraud

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect irregularities, including fraud. The risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error, as fraud may involve deliberate concealment by, for example, forgery or intentional misrepresentations, or through collusion. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below. However, the primary responsibility for the prevention and detection of fraud rests with the Trustee.

Our approach was as follows:

- We obtained an understanding of the legal and regulatory frameworks that are applicable to the Plan and determined that the most significant related to pensions legislation and the financial reporting framework. These are relevant sections of the Pensions Act 1995 and 2004 (and regulations made thereunder), FRS 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland' and the Statement of Recommended Practice (Financial Reports of Pension Schemes). We considered the extent to which a material misstatement of the financial statements might arise as a result of non-compliance.
- We understood how the Plan is complying with these legal and regulatory frameworks by making enquiries of the Trustee. We corroborated our enquiries through our review of the Trustee's meeting minutes.
- We assessed the susceptibility of the Plan's financial statements to material misstatement, including how fraud might occur by considering the key risks impacting the financial statements and documenting the controls that the Plan has established to address risks identified, or that otherwise seek to prevent, deter or detect fraud. In our assessment, we considered the risk of management override of controls. Our audit procedures included verifying cash balances and investment balances to independent confirmations, testing manual journals on a sample basis and also those journals where there is an increased risk of override, and an assessment of segregation of duties. These procedures were designed to provide reasonable assurance that the financial statements were free from fraud or error.
- Based on this understanding, we designed our audit procedures to identify non-compliance with such laws and regulations. Our procedures involved making enquiries of the Trustee for its awareness of any non-compliance of laws or regulations, inspecting correspondence with the Pensions Regulator and review of Trustee's minutes.
- The Plan is required to comply with UK pensions regulations. As such, we have considered the experience and expertise of the engagement team, to ensure that the team had an appropriate understanding of the relevant pensions regulations to assess the control environment and consider compliance of the Plan with these regulations as part of our audit procedures.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at https://www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Use of our report

This report is made solely to the Plan's Trustee, as a body, in accordance with the Pensions Act 1995 and Regulations made thereunder. Our audit work has been undertaken so that we might state to the Plan's Trustee those matters we are required to state to it in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Plan's Trustee as a body, for our audit work, for this report, or for the opinions we have formed.

Signed by:
Ernst & Young LLP
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Ernst & Young LLP
Statutory Auditor

Glasgow
Date 24 July 2026

Financial Statements

Fund Account
for the year ended 31 December 2025

	Note	2025 £'000	2024 £'000
Contributions and other income			
Employer contributions		85,819	84,008
Employee contributions		12,580	9,114
Total contributions	4	98,399	93,122
Transfers in	5	5,451	8,665
Other income	6	2,713	916
		106,563	102,703
Benefits and other outgoings			
Benefits paid or payable	7	3,264	2,421
Payments to and on account of leavers	8	221	144
Transfers to other plans	9	22,781	13,328
Other payments	10	1,273	1,676
		27,539	17,569
Net additions from dealings with Members		79,024	85,134
Returns on Investments			
Change in market value of investments	11	123,012	78,842
Net returns on investments		123,012	78,842
Net increase in the Plan		202,036	163,976
Opening net assets of the Plan		688,520	524,544
Closing net assets of the Plan		890,556	688,520

The notes on pages 19 to 26 form part of these financial statements.

Statement of Net Assets
available for benefits As at 31 December 2025

	Note	2025 £'000	2024 £'000
Investment assets			
Pooled investment vehicles	11	890,626	688,565
Current assets	14	2,120	2,580
Current liabilities	15	(2,190)	(2,625)
Total net assets available for benefits		890,556	688,520

The financial statements summarise the transactions of the Plan and deal with the net assets at the disposal of the Trustee. They do not take account of obligations to pay pensions and benefits which fall due after the end of the Plan year.

These financial statements were approved and signed on behalf of the Trustee on Jul 23, 2026 and Jul 24, 2026

Director DocuSigned by:
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Director DocuSigned by:
Parminder Kohli
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The notes on pages 19 to 26 form part of these financial statements.

Notes to the Financial Statements
for the year ended 31 December 2025

1. General information

The UK Shell Pension Plan ("the Plan") is an occupational pension scheme established as a trust under English law. The Plan was established to provide retirement benefits to certain groups of Shell employees whose base country is in the UK. The address of the Plan's principal office is Shell Centre, London SE1 7NA.

The Plan is registered pension scheme under Chapter 2, Part 4 of the Finance Act 2004. This means that contributions by employers and employees are exempt from income and capital gains tax.

2. Basis of preparation

The individual financial statements of the UK Shell Pension Plan have been prepared in accordance with the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, Financial Reporting Standard (FRS) 102 – The Financial Reporting Standard applicable in the UK and Republic of Ireland issued by the Financial Reporting Council ("FRS 102") and the guidelines set out in the Statement of Recommended Practice, "Financial Reports of Pension Schemes" (Revised July 2018) ("the SORP"). The financial statements have been prepared on the going concern basis. In assessing the appropriateness of the going concern basis of accounting, the Trustee considered a period of 12 months from the date that the financial statements are authorised for issue.

3. Summary of significant accounting policies

The following accounting policies applied in the preparation of these financial statements are set out below. These policies have been consistently applied to all the years presented, unless otherwise stated.

Currency
The Plan's functional currency and presentational currency is pounds sterling (GBP).

Contributions
Contributions are accounted for on an accruals basis, in the period to which they relate, except for the first contribution due where the employee has been auto-enrolled by the Employer, which is accounted for when received by the Plan. Normal contributions are accounted for in accordance with the Payment Schedule agreed by the Trustee with the Principal Employer. Additional voluntary contributions are accounted for in the period to which they relate.
Other contributions made by the employer to reimburse costs and levies payable by the Trustee are accounted for on the same basis as the corresponding expense.

Benefits and payments to leavers
Benefits are recognised in the period in which the member notified the Trustee on their decision on the type or amount of benefit to be taken, or if there is no member choice, on the date of leaving or retiring.
On retirement, members have the option to:

- Take all of their account as 100% cash
- Purchase an annuity (and take 25% cash), or
- Take a series of smaller cash sums. In order to do this members would need to transfer the value of their account to another registered scheme such as a self-invested personal pension.

In the case of an annuity the member purchases insurance contracts to provide the full pension to which they are entitled. Once purchased, the policies are owned solely by the member. These are charged to the fund account in the year of purchase and accordingly no value is ascribed to such policies in the statement of net assets.

Life assurance receipts
Life assurance receipts are accounted for on an accruals basis when they fall due.

Transfers to and from other plans

Transfer values represent the capital sums either receivable in respect of members from other pension plans of previous employers or payable to the pension plans of new employers for members who have left the Plan. Individual transfers in or out of the Plan are accounted for when member liability is accepted or discharged, which is normally when the transfer amount is paid or received.

Administrative and other expenses

Administrative expenses and premiums on term insurance policies are accounted for on an accruals basis.

Investment returns

Income from investments and deposits is dealt with on an accruals basis. Income from pooled investment vehicles is re-invested and accumulates within the relevant fund.

The changes in market value of investments are accounted for in the year in which they arise and include all increases and decreases in the market value of investments held at any time during the year, including profits and losses realised on sales of investments and unrealised changes in market value.

Transaction costs are incurred through the bid offer spread on investments within pooled investment vehicles.

Valuation of investments

Pooled investment vehicles are valued at a single price, using closing price as advised by the investment manager.

Investment management expenses

Investment management expenses are not separately charged to the Plan. Charges are reflected within the unit price of the underlying investments.

4. Contributions

	2025 £'000	2024 £'000
Employer:		
Normal	59,193	58,159
Salary Sacrifice	19,886	19,595
Salary Sacrifice AVC	5,467	4,578
Life Assurance Premium	1,273	1,676
	85,819	84,008
Employee:		
Normal	2,245	2,173
Additional voluntary contributions (AVC)	10,335	6,941
	12,580	9,114
	98,399	93,122

5. Transfers In

	2025 £'000	2024 £'000
Individual transfers in	5,451	8,665

6. Other income

	2025 £'000	2024 £'000
Bank interest	12	4
Life Assurance Income	2,701	912
	2,713	916

7. Benefits

	2025 £'000	2024 £'000
Commutation of pensions and lump sum retirement benefits	348	219
Death Benefits	2,916	2,202
	3,264	2,421

8. Payments to and on account of leavers

	2025 £'000	2024 £'000
Refunds of contributions	221	144

9. Transfers to other plans

	2025 £'000	2024 £'000
Individual transfers out to other plans	22,781	13,328

The significant increase observed in 2025 is highly member-specific and depends on the value of individual benefits.

10. Other payments

	2025 £'000	2024 £'000
Premiums on term insurance policies	1,273	1,676

11. Investment assets

Analysis of money purchase assets

Investments purchased by the Plan are allocated to provide benefits to the individuals on whose behalf the corresponding contributions were paid. Accordingly, the assets identified as designated to members in the net assets statement do not form a common pool of assets available for members generally.

	2025 £'000	2024 £'000
Assets designated to members	890,626	688,565

Market value reconciliation

	Value at 1 January 2025 £'000	Purchases at Cost £'000	Sales Proceeds £'000	Change in Market £'000	Value at 31 December 2025 £'000
Investments					
Pooled investment vehicles	688,565	837,603	(758,554)	123,012	890,626
	688,565	837,603	(758,554)	123,012	890,626

Of the above fund value at 31 December 2025 £58,895,000 (2024: £37,353,000) related to AVC investments.

Pooled investment vehicles

The Fund's investments in pooled investment vehicles at the year-end comprised:

	2025 £000	2024 £000
Equity	882,576	633,720
Cash	6,276	4,332
Fixed Income	946	30,704
Property	828	19,809
	890,626	688,565

Fidelity pooled investment vehicles are all UK unquoted managed funds and are operated by companies registered in the UK.

Transaction costs

Transaction costs are included in the cost of purchases and deducted from sale proceeds. Direct transaction costs include costs charged to the Plan such as fees, commissions and stamp duty. Indirect transaction costs are incurred through the bid offer spread on investments within pooled investment vehicles.

Concentration of investment

The following investments represent more than 5% of the total value of the net assets of the Plan.

	Market Value 2025	Percentage of Net Assets	Market Value 2024	Percentage of Net Assets
Investment	£,000	%	£,000	%
Growth Fund	-	-	601,475	87.4
FutureWise Target 2045 - Class 3	158,929	17.8	-	-
FutureWise Target 2050 - Class 3	154,441	17.3	-	-
FutureWise Target 2040 - Class 3	130,949	14.7	-	-
FutureWise Target 2055 - Class 3	117,039	13.1	-	-
FutureWise Target 2035 - Class 3	102,739	11.5	-	-
FutureWise Target 2060 - Class 3	76,147	8.6	-	-
FutureWise Target 2030 - Class 3	55,885	6.3	-	-

At the year end investments are considered to be marketable on a short term basis.

12. Fair value of instruments

The fair value of investments has been determined using the following hierarchy. The hierarchy reflects the valuation technique and is not an assessment of risk.

The unadjusted quoted price in an active market for identical assets or liabilities that the entity can access at the measurement date.	→	Level 1
Inputs other than quoted prices included within Level 1 that are observable (i.e. developed using market data) for the asset or liability, either directly or indirectly.	→	Level 2
Inputs are unobservable (i.e. for which market data is unavailable) for the asset or liability.	→	Level 3

The Plan's investment assets and liabilities have been included at fair value within these categories as follow:

	Level 1	Level 2	Level 3	2025 Total
	£,000	£,000	£,000	£,000
Investment assets				
Pooled investment vehicles	-	890,626	-	890,626
Total investments	-	890,626	-	890,626

Analysis for the prior year end is as follows:

	Level 1	Level 2	Level 3	2024 Total
	£,000	£,000	£,000	£,000
Investment assets				
Pooled investment vehicles	-	688,565	-	688,565
Total investments	-	688,565	-	688,565

13. Investment Risks

The members of the UK Shell Pension Plan access its DC investments through a life policy issued by FIL Life Insurance Limited ('Fidelity'). Fidelity offers the members a range of unit linked funds that in turn are invested with a range of underlying fund managers. The day to day management of the underlying investments within these funds is the responsibility of the respective managers, including the direct management of credit and market risks.

FRS 102 requires the disclosure of information in relation to certain investment risks. The risks disclosed below relate to the Plan's investments as a whole. Members can either select the Default Option or are able to choose their own investments from the range of funds offered by the Trustee and therefore may face a different profile of risks from their individual choices compared with the Plan as a whole.

Credit risk: this is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation.

Market risk: this comprises currency risk, interest rate risk and other price risk:

- Currency risk: this is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in foreign exchange rates.
- Interest rate risk: this is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in market interest rate.
- Other price risk: this is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in market prices (other than those arising from interest rate risk or currency risk), whether those changes are caused by factors specific to the individual financial instrument or its issuer, or factors affecting all similar financial instruments traded in the market.

In response to the above, the Plan is subject to credit risk in relation to:

- Fidelity through its holding in unit linked insurance funds provided to the Plan by Fidelity, which are not rated, as set out in the tables below.
- The Plan is also subject to indirect credit and market risk arising from the underlying investments held in the underlying funds.

The following table summarises which risks each of the funds are exposed to:

Exposed to	Risk Categorisation					Value
	Credit Risk					£'000
	Direct	Indirect	Currency	Interest Rate	Other Price Risk	
FutureWise Target 2045 - Class 3	✓	×	✓	×	✓	158,929
FutureWise Target 2050 - Class 3	✓	×	✓	×	✓	154,441
FutureWise Target 2040 - Class 3	✓	×	✓	×	✓	130,949
FutureWise Target 2055 - Class 3	✓	×	✓	×	✓	117,039
FutureWise Target 2035 - Class 3	✓	×	✓	×	✓	102,739
FutureWise Target 2060 - Class 3	✓	×	✓	×	✓	76,147
FutureWise Target 2030 - Class 3	✓	✓	✓	✓	✓	55,885
BlackRock World (ex-UK) Equity Index Fund	✓	×	✓	×	✓	19,768
FutureWise Target 2025 - Class 3	✓	✓	✓	✓	✓	19,388
HSBC Islamic Global Equity Index Fund	✓	×	✓	×	✓	16,425
FutureWise Target 2065 - Class 3	✓	×	✓	×	✓	13,743
BlackRock Cash Fund	✓	✓	×	✓	×	6,276
Mellon Long Term Global Equity Fund	✓	×	✓	×	✓	4,095
BlackRock Emerging Markets Index Fund	✓	×	✓	×	✓	3,758
FutureWise Retirement Fund - Class 3	✓	✓	✓	✓	✓	3,135
BlackRock UK Equity Index Fund	✓	×	×	×	✓	3,074
BlackRock ACS World Multifactor ESG Equity Tracker Fund	✓	×	✓	×	✓	1,829
FutureWise Target 2070 - Class 3	✓	×	✓	×	✓	1,207
Threadneedle Property Fund	✓	×	×	×	✓	829
M&G Total Return Credit Fund	✓	✓	×	✓	×	691
HSBC Global Sukuk Bond Fund	✓	✓	✓	×	✓	169
Fidelity Pension Annuity Fund	✓	✓	×	✓	×	86
Nordea Global Climate & Environment Fund	✓	×	✓	×	✓	24
Total						890,626

14. Current assets

	2025 £'000	2024 £'000
Contributions due in respect of:		
Employers	327	318
Employees	120	117
Prepaid expenses	404	1,676
Other debtors	754	-
Cash balances	515	469
	2,120	2,580

All contributions due to the Plan at 31 December 2025 and 31 December 2024 relate to December 2025 and December 2024 respectively and were paid in full to the Plan in accordance with the Payment Schedule and therefore do not count as employer-related investments.
Included in the cash balances shown above is £504,263 (2024: £458,522) which is allocated to members.

15. Current liabilities

	2025 £'000	2024 £'000
Contributions received in advance	404	1,676
Unpaid benefits	1,655	490
Other creditors	131	459
	2,190	2,625

Included in the table shown above there is £131,095 (2024: £458,522) other creditors which is allocated to members.

16. Related party transactions

Six Trustee Directors were members of the Plan during the year (this includes Directors who resigned during 2025) (2024: 3).

There was no employer-funded Trustee remuneration during 2025 (2024: nil).

All administrative costs have been met directly by the Principal Employer.

There were no other related party transactions during the year other than those disclosed elsewhere in the financial statements.

17. Employer related investments

There were no directly held employer related investments (as defined under section 40(2) of the 1995 Pensions Act), during the year.

Whilst detailed information is not routinely reported, analysis of the nature and objectives of underlying funds confirmed that employer related investments held during the year made up approximately 0.1% (2024: 0.3%) of net assets.

18. Contingent liabilities

In the opinion of the Trustee, the Plan had no contingent liabilities at 31 December 2025 (2024: nil).

19. Subsequent events

There were no subsequent events requiring disclosures in the financial statements.

Independent Auditor's Statement about Contributions to the Trustee of the UK Shell Pension Plan

We have examined the summary of contributions to the UK Shell Pension Plan in respect of the Plan year ended 31 December 2025 to which this statement is attached.

In our opinion contributions for the Plan year ended 31 December 2025 as reported in the summary of contributions and payable under the Payment Schedule have in all material respects been paid at least in accordance with the Payment Schedule dated June 2019.

Scope of work on Statement about Contributions

Our examination involves obtaining evidence sufficient to give reasonable assurance that contributions reported in the summary of contributions on page 28 have in all material respects been paid at least in accordance with the Payment Schedule. This includes an examination, on a test basis, of evidence relevant to the amounts of contributions payable to the Plan and the timing of those payments under the Payment Schedule.

Respective responsibilities of Trustee and the auditor

As explained more fully in the Statement of Trustee's Responsibilities, the Plan's Trustee is responsible for securing that a Payment Schedule is prepared, maintained and from time to time revised and for monitoring whether contributions are made to the Plan by the employer in accordance with the Payment Schedule.

It is our responsibility to provide a Statement about Contributions paid under the Payment Schedule and to report our opinion to you.

Use of our statement

This statement is made solely to the Plan's Trustee, as a body, in accordance with regulation 4 of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, made under the Pensions Act 1995. Our audit work has been undertaken so that we might state to the Plan's Trustee those matters we are required to state to it in an auditor's statement and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Plan's Trustee as a body, for our work, for this statement, or the opinions we have formed.

Signed by:
Ernst & Young LLP
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Ernst & Young LLP
Statutory Auditor

Glasgow
Date: 24 July 2026

Trustee's summary of contributions for the year ended 31 December 2025

During the year ended 31 December 2025, the contributions payable to the Plan were as follows:

Contributions payable under the Payment Schedule	**£'000**
Employer	
- Normal	59,193
- Salary Sacrifice	19,886
- Life Assurance Premium	1,273
Employee	
- Normal	2,245
	82,597
Other contributions payable	
Employer	
- Salary Sacrifice Additional Voluntary	5,467
Employee	
- Additional Voluntary	10,335
	15,802
Contributions per Fund Account	**98,399**

During the year contributions were received in accordance with the Payment Schedule dated June 2019.

This summary is prepared solely for the purpose of reconciling the contributions required by the Payment Schedule (and therefore subject to the auditor's statement on the previous page) to the contributions recognised in the financial statements.

Signed on behalf of the Trustee

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Director DocuSigned by: Parminder Kohli EED0B75ED0EF49E...

Date: Jul 23, 2026 and Jul 24, 2026

Statement of Investment Principles
('the Statement')

1. Scope of Statement

This Statement has been prepared in accordance with Section 35 of the Pension Act 1995 (as subsequently amended).

The effective date of this Statement is 20 June 2025.

The Trustee will review this Statement at least every three years and without delay either where any significant change in investment policy is contemplated or the demographic profile of the relevant members changes.

2. Consultations Made

The Trustee is responsible for the appointment of the investment provider and for monitoring the investment provider. In addition, the Trustee is responsible for the choice of investment options made available to members of the UKSPP, including the Default Option (as outlined below) into which contributions will be paid in the absence of any instructions from the member. Before making this choice, the Trustee obtained and considered written advice on the investment options appropriate for the UKSPP from Aon Investments Limited ("Aon"), who are authorised and regulated by the Financial Conduct Authority to give such advice under the Financial Services and Markets Act 2000.

The Trustee is also responsible for the preparation of this Statement. Before preparing this Statement, the Trustee obtained and considered written advice provided by Aon.

The Trustee has consulted with the Principal Employer, Shell International Ltd, on behalf of all the Participating Employers of the UKSPP, prior to writing this Statement and has considered their recommendations. The Trustee will take the Principal Employer's comments into account when it believes it is appropriate to do so.

3. UKSPP Objectives

The Trustee's primary objectives are:

- "asset choice" to ensure members have an appropriate choice of assets for investment; and
- "return objective" to enable members to benefit from investment in assets which are expected to achieve growth until they approach retirement, when they will be able to switch to assets which are more related to their income and cash requirements in retirement.

The Trustee's investment strategy has been chosen to enable members to maximise the likelihood of achieving these objectives.

4. Investment Management Arrangements

The Trustee has appointed FIL Life Insurance Ltd ('Fidelity') as the provider of administration services and the investment platform to the UKSPP. Fidelity is also the investment manager for the default investment option.

5. Investment Risk Measurement and Management

The Trustee recognises that members take the investment risk. The Trustee takes account of this in the selection and monitoring of the investment manager and the choice of funds offered to members.

6. Asset Allocation Strategy

The Trustee recognises that the key source of financial risk (in relation to members meeting their objectives) normally arises from asset choice. The Trustee therefore retains responsibility for the investment funds made available to the membership and takes expert advice as required from its professional advisors.

The Trustee is required to provide a default arrangement in members' interests and keep it under review. The Trustee takes account of the level of costs and the risk profile that are appropriate for the UKSPP's membership in light of the overall objective of the default arrangement.

The default arrangement is the Fidelity FutureWise Strategy, an asset allocation strategy offered to members through the use of Target Date Funds (TDF). This strategy is where all new members are directed in the absence of an active member decision. The strategy has been put in place following consideration of the UKSPP’s membership, the risks associated with investment and after taking advice from Aon. The Trustee regularly reviews the appropriateness of the default arrangement.

Details of the Default Option are provided below.

Fidelity FutureWise Target Date Funds (The Default Option)

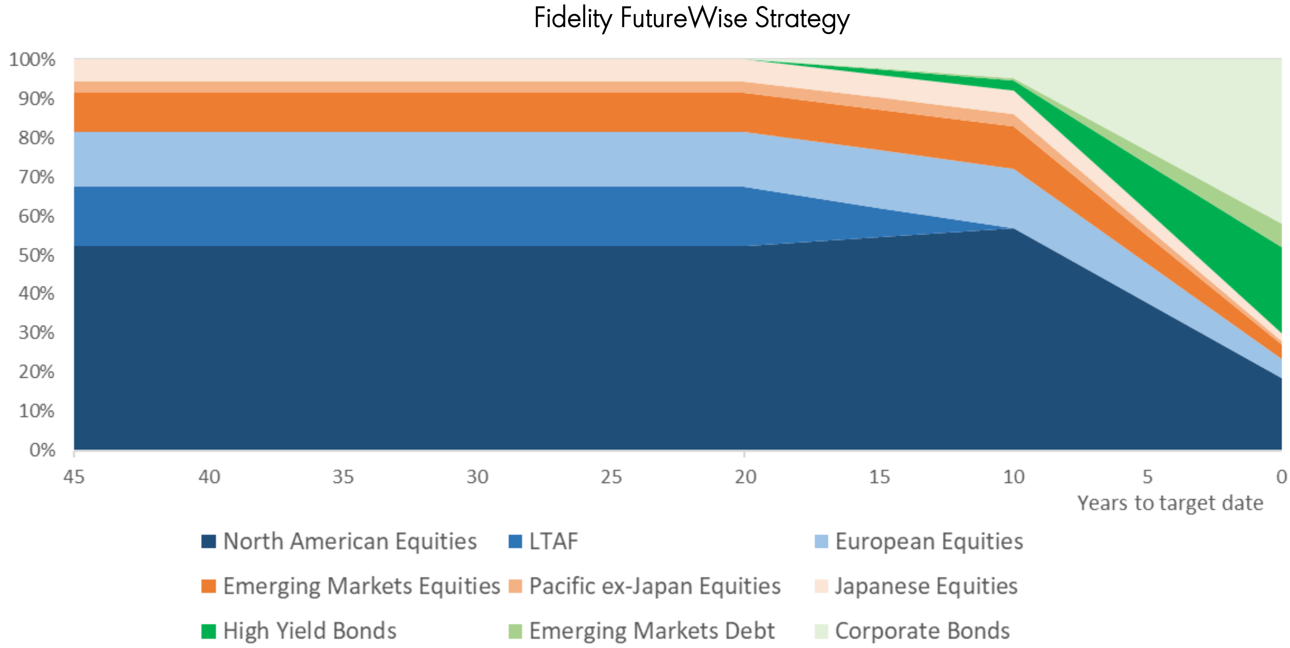
The aim of FutureWise is to provide opportunity for growth in the early years by investing in growth seeking assets, namely equities. As a member approaches their target retirement date, FutureWise assets are gradually switched into a more diversified range of investments with the aim of reducing overall volatility. Fidelity are targeting an allocation of 15% to a private markets fund in the early years. This allocation will be built up over a three year period from 2025.

FutureWise uses a target driven approach to investing during the growth phase, where investments are managed against long-term targets, linked to inflation during the growth phase (CPI + 4% p.a.). These targets have been determined by Fidelity, based on its view on appropriate levels of risk and return.

During the transition phase, returns are not linked to inflation. Instead, FutureWise aims to achieve smoother long term capital growth, with lower expected volatility and consequently lower expected returns than the growth phase.

During the retirement phase (for a member who remains invested past the target retirement date of the strategy), the objective of the FutureWise strategy is to generate a return of 3.5% - 4.0% per annum, providing long term protection for members against inflation, while aiming to provide a level of growth to sustain income through retirement.

This structure is summarised in the chart below.



In setting the default strategy, the Trustee has reviewed the extent to which the expected return on investments (after deduction of any charges related to those investments) is consistent with the objectives of the strategy, which is broadly to provide an appropriate risk/return profile given the needs of members.

7. Choosing Investments

The investment options offered to members are deemed appropriate, given the nature of the membership.

The Trustee has put in place the Default Option in acknowledgement that many members will be unwilling or feel unable to make investment choices. A default arrangement is also a requirement, as the UKSPP is an automatic enrolment qualifying scheme. However, a choice of stand-alone funds are also offered so members can tailor their investment selections, to meet their requirements, if they so wish.

Day to day selection of stocks is delegated to the investment managers appointed by the Trustee. The Trustee takes professional advice when formally reviewing the investment manager or funds offered to members.

8. Arrangements with investment managers

The Trustee monitors those investments used by the UKSPP to consider the extent to which the investment strategy and decisions of the investment managers are aligned with the Trustee's policies as set out in the Statement of Investment Principles, including those related to environmental, social and governance matters that may have a financial impact on the investment returns and risk (including financial risk from climate change).

This includes having policies in place to monitor the extent to which the investment managers:

- make decisions based on assessments about medium- to long-term financial and non-financial performance of an issuer of debt or equity; and

- engage with issuers of debt or equity in order to improve their performance in the medium- to long-term.

The Trustee is supported in this monitoring activity by its investment advisor.

Details of the arrangements for each underlying investment manager are set out in legal agreements between the investment managers and the platform provider, Fidelity. The Trustee does not have any legal contracts with underlying investment managers, however, investment managers are selected and monitored by the Trustee and the Trustee engages with investment managers directly during the selection, monitoring and review processes. Recognising that the Trustee does not contract directly with the underlying managers, the Trustee will seek to express its expectations to the investment managers by other means, such as in writing, or verbally at Trustee meetings to try to achieve greater alignment.

The Trustee shares its policies, as set out in this SIP, with the UKSPP's investment managers and with any new investment manager prior to appointment. The Trustee requests that the investment managers, including any new investment managers, review and confirm whether their approach is materially aligned with the Trustee's policies.

The Trustee believes that setting clear objectives for the investment strategy, having a robust process for selecting managers, having appropriate governing documentation, setting clear expectations to the investment managers and undertaking regular monitoring of investment managers' performance and investment strategy, is generally sufficient to incentivise the investment managers to make decisions that align with the Trustee's policies.

Where investment managers are considered to be making decisions that are not in line with the Trustee's policies, expectations, or the other considerations set out above, the Trustee will typically first engage with the investment manager and may ultimately remove or replace the investment manager.

There is typically no set duration for arrangements with the investment managers, although the continued appointment for investment managers will be reviewed periodically, and at least every three years as part of the regular investment strategy review.

9. Potential Risks

The main areas of risk with this type of arrangement are as follows:

Market fluctuations – where unit linked policies are used, the value of policies allocated for member benefits may fluctuate with the movement in the underlying asset values. This means that, at a member's retirement, there is the possibility that the fund will have to be realised at an inopportune time to provide retirement benefits. The UKSPP rules allow a degree of flexibility when benefit payments may start, helping to mitigate the risk of a member having to take benefits at an inopportune time. For those members invested in the Default Option, funds will automatically be switched into a diversified range of assets, as described above, as they approach retirement with the aim of reducing market volatility. Where members are making their own investment choices, it should be noted that the risk profile of the members' assets will be affected by their choice of funds, and that the range of funds that are available includes funds that are aimed at offering relative security as retirement approaches.

Annuity purchase – the rates applied when pension funds are used to buy annuities may be more expensive than anticipated and the more expensive annuity rates could coincide with a time when retirement funds have lost value due to market fluctuations, as described above. Again, UKSPP rules allow flexibility in the timing of when benefit payments may start for a member, to help reduce the impact of this risk. The UKSPP offers self-select funds that aim to broadly match annuity price fluctuations, with the aim of protecting the level of the benefits that will be provided.

Inflation – the absolute return on investments and hence the value of the pension policy may be diminished by inflation. To help mitigate this risk, a range of funds is offered including growth funds which aim to provide real growth (in excess of inflation) over the long term.

Assets may not be readily realisable – a member may want to use policy proceeds for benefits at a time when there may be a delay in realisation (mainly related to investments in property-based funds). Whilst the Default Option does invest in illiquid assets, FutureWise has been designed to preserve member liquidity at the overall strategy level. Funds with greater illiquidity are available as self-select options and members should consider this when they approach retirement.

10. Illiquid Investment Policy

Default Option

The Trustee holds illiquid investments on behalf of members who are invested in the Default Option. The illiquid investments are held through an underlying illiquid investment fund within the FutureWise strategy.

The allocation is included to improve the expected member outcomes and increase diversification of return drivers for members. The allocation to illiquid holdings is at the investment manager's discretion and the allocations may increase or decrease over time.
The allocation to illiquid investments is held within the growth phase of the Default Option. The allocation gradually reduces starting from when a member is 10 years away from their target retirement age.

Whilst the Trustee recognises that illiquid investments may be associated with higher costs and liquidity risks, they nevertheless believe that access to an illiquidity premium should benefit members long term. They also believe that the blended fund structure within which the illiquid investments are held should ensure sufficient member liquidity, even in the event that assets in the illiquid fund cannot be readily realised.

Self-select fund range

The Trustee recognises that illiquid investments may be suitable for members and offers members the option to investment in illiquid assets through a physical property fund as a self-select option. Whilst the Trustee recognises that illiquid investments may be associated with higher costs and liquidity risks, they nevertheless believe that access to an illiquidity premium may be beneficial for some members in the long term.

11. Custody

Investment in pooled funds gives the Trustee rights to the cash value of the units rather than to the underlying assets. The underlying investment manager of each of the pooled funds is responsible for the appointment and monitoring of the custodian of the fund's assets.

12. Expected Returns on Assets

Over the long-term the Trustee's expectations are:

- For units representing "growth" assets (UK equities, overseas equities, multi-asset funds and property), to achieve a real return (in excess of inflation) over the long term. The Trustee considers short-term volatility in equity price behaviour to be acceptable, given the general expectation that over the long-term equities will outperform the other major asset classes.

- For units representing monetary assets (UK bonds), to achieve a rate of return which is expected to be approximately in line with changes in the cost of providing fixed income annuities.
- For units representing inflation linked assets (UK index-linked bonds), to achieve a rate of return which is expected to be approximately in line with changes in the cost of providing real annuities that increase in line with inflation;
- For units representing cash, to protect the capital value of the investment and achieve a rate of return in line with money market interest rates.

Returns achieved by the investment manager are assessed against performance benchmarks set by the Trustee in consultation with its investment advisor and the investment manager.

13. Self-Select Arrangements

Members who wish to make their own arrangements from the funds available under the UKSPP can do so by choosing a different option to the Default Option. This is called the "Self-Select" option.

14. Realisation of Investment / Liquidity

The Trustee recognises that there is a risk of holding assets that cannot easily be realised should the need arise. The majority of assets held on behalf of members are realisable at short notice (through the sale of units in pooled funds).

15. Responsible Investment

The term Responsible Investment does not have a common, universal definition and in practice is used in a number of different circumstances with different meanings. For the purpose of this Statement, the following distinction is made:

ESG	Responsible Investment	Responsible Ownership
This refers to the three groups of factors, environmental, social and governance, that are relevant to measure the sustainability and impact of an investment. The constituent factors are many and can vary across sectors and vendors. Current examples include: • Environmental: climate change, natural resources, pollution & waste, water use and biodiversity. • Social: human capital, product liability, stakeholder opposition and social opportunities. • Governance: corporate governance including board structure, executive remuneration and diversity and corporate behaviour.	An approach to investing and ownership that seeks to act as a Responsible Owner and include ESG factors into investment analysis and decision making, to better manage financial and reputational risk and generate sustainable long-term financial value.	This is a sub-set of Responsible Investment and relates mainly to exercising one's rights as an owner of assets (for example voting and engagement) rather than remaining on the sidelines. The Trustee believes it is important for both the Trustee to engage with investment managers, and for investment managers to provide information and report on their voting and engagement activities for the funds in which the UKSPP invests.

The Trustee manages the UKSPP investments with the aim of providing positive retirement outcomes for members. It believes that Responsible Investment, as defined above, is key to achieving long term sustainable returns and that adopting a Responsible Investment approach is likely to improve risk-adjusted returns.

These considerations include the belief that ESG factors, including climate change, are likely to be financially material and the risk that these factors may impact the value of investments held over a time frame relevant to members' finances. The Trustee will consider these risks and take advice from its investment advisor with regard to investment strategy including setting investment objectives, selecting asset classes and investment managers, ongoing monitoring of performance and assessment of future risks.

The Trustee believes that climate change (in the form of societal energy transition changes) is likely to impact on returns over a time frame relevant to members' finances.

The Trustee believes that poorly governed companies are more likely to underperform.

The Trustee also believes that investments that have a negative social impact are likely to generate lower risk-adjusted financial returns.

Reflecting these beliefs, the Trustee is satisfied that the Default Option incorporates an ESG focus through ESG exclusions and through application of Fidelity's approach to sustainability, with the overall objective of helping to manage the risks associated with climate change. Additionally, the inclusion of an ESG focus for all underlying funds ensures that the default screens out companies that may have a significant negative social impact, or do not meet the principles of the UN Global Compact. The Trustee believes the inclusion of ESG considerations will help manage risks for members but without materially impacting the expected return and risk profile of the Default Option.

In setting and implementing the UKSPP's investment strategy, the Trustee has not taken into account those non-financial factors that are not expected to be material for financial risk or return within the Default Option. The term non-financial factors means the views of the members, including (but not limited to) their ethical views and their views in relation to social and environmental impact and present and future quality of life. To the extent that these topics are financially relevant, they are taken into account in the investment strategy including the selection of investment managers.

However, the Trustee considers member choice as important, and so a suitable range of funds is offered within the self-select options, including where members wish to express a values-based preference in their pension saving. This includes an actively managed global equity fund, which focuses on providing a positive ESG impact alongside a financial objective. The Trustee also makes available a passive global equity fund, which incorporates an ESG screen that aims to improve the average ESG score by removing companies that may have a negative social impact or do not meet the principles of the UN Global Compact.

The Trustee makes available specialist investment funds for those members who wish to invest in line with Islamic principles.

The Trustee's investment strategy is implemented through a range of pooled funds that are managed by a range of investment managers. By investing in this way, the Trustee recognises that the day to day responsibility for Responsible Investment is delegated to the investment managers on the Trustee's behalf. The Trustee further recognises that for investments that are passively managed (i.e. invest in line with a benchmark), Responsible Investment activities will be predominantly focussed on voting and engagement.

The Trustee believes it is important that it acts as a responsible asset owner and that its investment managers are engaged with the underlying companies and assets in which the UKSPP invests to ensure high standards of governance and promotion of corporate responsibility. The Trustee believes it is important to act as a long-term investor, as this ultimately creates long-term financial value for the UKSPP members.

The Trustee will regularly review the continuing suitability of the appointed investment managers and take advice from its investment advisor with regard to any changes. With the support of its advisors, the Trustee will:

- Monitor each investment manager's policies and activities with regard to Responsible Investment through regular reporting on the ratings for the investment managers provided by its investment advisor;
- Receive updates from the underlying investment managers on their policies and activities in these areas, including practical examples of the implementation of these policies and ongoing stewardship, through presentations and reports; and
- Monitor whether each investment manager is signed up to the UN Global Compact principles.

Consideration of the above will also form part of the due diligence process when selecting new investment managers.

If an incumbent investment manager is found to be falling short of the standards the Trustee has set out in its policy, the Trustee will typically first engage with the investment manager and may ultimately remove or replace the investment manager.

As part of their delegated responsibilities, the Trustee will expect the UKSPP's investment managers to:

- where appropriate, engage with investee companies, including in relation to ESG, with the aim to protect and enhance the value of assets; and
- exercise the Trustee's voting rights in relation to the UKSPP's assets.

The Trustee reviews the stewardship activities of its investment managers on an annual basis, covering both engagement and voting actions. This will be reported on in the UKSPP's annual Implementation Statement. The Trustee will review the alignment of its policies to those of the UKSPP's investment managers and ensure its investment managers use their influence as major institutional investors, where possible, to carry out the Trustee's rights and duties as a responsible shareholder and asset owner. This will include voting, along with – where relevant and appropriate – engaging with underlying investee companies and assets to promote good corporate governance and accountability.

The Trustee will engage with its investment managers as necessary for more information, to ensure that robust active ownership behaviours, reflective of their active ownership policies, are being actioned. With regard to transparency over voting, the Trustee expects to receive reporting on voting actions and rationale for those votes, where relevant to the UKSPP; in particular, where votes were cast against management or where votes were abstained. This will take the format of annual reporting.

From time to time, the Trustee will consider the methods by which, and the circumstances under which, it would monitor and engage with an investment manager. The Trustee may engage on matters concerning an issuer of debt or equity, including their performance, strategy, risks, social and environmental impact and corporate governance, the capital structure and management of actual or potential conflicts of interest.

16. Costs and transparency

The Trustee is aware of the importance of monitoring its investment managers' total costs and the impact these costs can have on the overall value of members' assets. Consequently, the Trustee believes it is important to understand all the different costs and charges which are paid by members. These include:

- The annual management charge paid to the manager of each fund, where available, included within the overall Total Expense Ratio ("TER");
- The annual management charge paid to Fidelity for the investment platform and administration services for each fund, included within the TER;
- Any additional charges incurred, such as additional fund expenses, with these being considered in respect of each fund in isolation; and
- The amount of portfolio turnover costs (transaction costs) borne within a fund.

The Trustee acknowledges that portfolio turnover costs are a necessary cost to generate investment returns and that the level of these costs varies across asset classes and managers. The Trustee defines portfolio turnover costs as the costs incurred in buying and selling underlying securities held within the fund's portfolio. These are incurred on an ongoing basis and are implicit within the performance of each fund.

The member borne costs of the UKSPP, as described above, are met through annual charges on the funds in which the UKSPP members are invested; these charges are calculated on a percentage of the value of the assets. The Trustee collects information on all the member-borne costs and charges on an annual basis, where available, and sets these out in the Annual Chair's Statement regarding DC Governance (the "Annual Chair's Statement"), which is made available to members in a publicly accessible location.

No specific ranges are set for acceptable costs and charges, particularly in relation to portfolio turnover costs. However, the Trustee expects its investment advisor to highlight if these costs and charges appear unreasonable when they are collected as part of the Annual Chair's Statement. Having reviewed each fund's costs, the Trustee, with the support of its investment advisor, will then consider whether any action is required which might include additional investigation, escalating concerns to the investment manager and ultimately removing the fund from the fund range.

It is the Trustee's view that long term performance, net of fees, is the most important metric on which to evaluate its investment managers. The Trustee believes that active investment managers can add value, net of fees, for some asset classes and asset strategies. It is therefore comfortable with the inclusion of some actively managed funds in the Default Option. Passively managed funds are also used in the Default Option and are made available in the self-select range.

Other costs of providing the UKSPP, including advisor costs, are not charged to the members, but are met by the Employer. The Trustee's investment advisors are paid for advice received either on a time-cost basis, or on a pre-agreed fixed fee basis.

17. Effective Decision Making

The Trustee recognises that decisions should be taken only by persons or organisations with the skills, information and resources necessary to take them effectively. The Trustee also recognises that where it takes investment decisions (for example, when making changes to the default arrangements or the funds available through the Self Select option) it must have sufficient expertise and appropriate training to be able to evaluate critically any advice it takes.

18. Additional Voluntary Contribution Arrangements

Some members obtain further benefits by paying extra contributions (Additional Voluntary Contributions or AVCs) to the UKSPP. The liabilities in respect of these AVCs are equal to the value of the investments bought by the contributions. All funds made available to members are open to AVCs.

From time to time the Trustee will review the choice of investments available to members to ensure that they remain appropriate to the members' needs.

19. Employer's Reserve

All funds held by the UKSPP that are not attributable to members' UKSPP Accounts are notionally allocated to the Employer's Reserve. The Employer's Reserve may be used to offset future contributions or pay UKSPP expenses, as directed by the Principal Employer. The Trustee will invest the Employer's Reserve in cash (or cash like investments) – either the Trustee's bank account or the Cash Fund.

20. Timing of Periodic Review

The Trustee will review the UKSPP’s investment options for members including the default arrangements annually and whenever it believes there to be a significant change in the UKSPP's circumstances. The Trustee will consult its advisors for a major review of the arrangements.

Annual Chair's Statement

Annual Chair's Statement for the UK Shell Pension Plan ("the Plan")

The Occupational Pension Schemes (Scheme Administration) Regulations 1996 ("the Administration Regulations") requires the Trustee to prepare an annual statement regarding governance and include this in the annual Trustee report and accounts. The governance requirements apply to all defined contribution ("DC") pension arrangements and aim to help members achieve a good outcome from their pension savings.

This statement issued by the Trustee covers the period from 1 January 2025 to 31 December 2025 and is signed on behalf of the Trustee by the Chair.
This statement covers governance and charge disclosures in relation to the following:

1. The default arrangements
2. Net investment returns
3. Member borne charges and transaction costs
    i. Default arrangement
    ii. Self-select funds
    iii. Illustrations of the cumulative effect of these costs and charges
4. Value for Members assessment
5. Processing of core financial transactions
6. Trustee knowledge and understanding

1. The default arrangements

The Trustee is required to design the default arrangements in members' interests and keep them under review. The Trustee needs to set out the aims and objectives of the default arrangements and take account of the level of costs and the risk profile that are appropriate for the Plan's membership.

The Plan is used as a Qualifying Scheme for auto-enrolment purposes.
The Trustee is responsible for the Plan's investment governance, which includes setting and monitoring the investment strategy for the Plan's primary default arrangement and other default arrangements. During the Plan year the default transitioned to the 'Fidelity FutureWise Target Date Fund strategy' from the 'UKSPP Drawdown Lifestyle Approach'.
At the start of 2025, the UKSPP Drawdown Lifestyle Approach (the "previous Primary Default") was primarily provided for members who joined the Plan and did not choose an investment option for their contributions and were looking to take their retirement savings through income drawdown in retirement.
The other lifestyle strategies – the UKSPP Annuity Purchase Lifestyle Approach and the UKSPP Cash Lifestyle Approach – also contain members' funds where no active decision has been taken to invest in that option. Therefore, these are also considered "default" strategies for the purposes of legislation.
During June 2025, members who were also invested in the lifestyle strategies were transitioned to the Fidelity FutureWise Target Date Fund Strategy (the "new Primary Default") and any members who join the Plan and do not choose an investment option for their contributions will be invested in this strategy.
Furthermore, the BlackRock Cash Fund option offered to members of the UKSPP is also considered a "default" arrangement, as defined in legislation. This is because contributions for members investing in the UK property fund option were invested into the fund following the suspension of the UK property fund from March 2020 to September 2020. Additionally, if one of the self-select fund options is removed and members do not make a choice for their investments, the Trustee has agreed that the BlackRock Cash Fund option may be used for the redirection of members' future contributions and existing assets.

Details of the objectives and the Trustee's policies regarding the default arrangements can be found in a document called the 'Statement of Investment Principles' (SIP). The Plan's SIP is attached; however, the aims are set out here for ease of reference:

- "asset choice" to ensure members have an appropriate choice of assets for investment; and
- "return objective" to enable members to benefit from investment in assets which are expected to achieve growth until they approach retirement, when they will be able to switch to assets which are more related to their income and cash requirements in retirement.

The Trustee's investment strategy has been chosen to enable members to maximise the likelihood of achieving these objectives, taking into account the profile of membership.

Investment strategy review

An investment strategy review, including a review of the default arrangements, is undertaken at least every three years, or following any significant changes in the demographic profile of the Plan members, which is in line with the Regulatory requirements.

This last review, which included a review of the default arrangements and self-select fund range, was completed on 4 July 2024, with the agreed changes implemented in the 2025 Plan year.

As part of the investment strategy review, the following areas were considered:

- Trustee's investment beliefs and priorities
- Meeting the needs of members
- Reviewing the default arrangements
- Alternative arrangements
- Membership impact analysis
- Reviewing the wider self-select fund range

The Trustee took advice from its investment consultant, Aon, on all these aspects. Subsequently, the Trustee decided to select the Fidelity FutureWise Target Date Fund strategy as the new Plan Primary Default.

Assets from the previous Primary Default and the alternative lifestyle strategies transferred into FutureWise. The Trustee believed that moving to FutureWise offered a more efficient governance structure without compromising on investment quality. The transition to the Fidelity FutureWise Target Date Funds took place in June 2025.

A thorough review of the self-select fund range was undertaken as a part of the investment strategy review, and the Trustee took advice from its investment consultant, Aon. The Trustee concluded that there was scope to improve the self-select fund range, resulting in the introduction of the below funds to the range in November 2024:

- Nordea Global Climate & Environment Fund
- HSBC Global Sukuk Bond Fund
- M&G Total Return Credit Fund

In addition to the above funds being added to the self-select range, the Trustee agreed to remove the following four self-select funds from the Plan:

- RBC Global Focus Equity Fund
- BlackRock Over 5 Years Index-Linked Gilt Fund
- BlackRock Aquila Life Market Advantage ("ALMA") Fund
- BlackRock Absolute Return Bond Fund.

Removal of these funds took place following the implementation of the FutureWise default change.

Until the implementation of the Fidelity FutureWise Target Date Funds in June 2025, the UKSPP Drawdown Lifestyle Approach continued as the Primary Default Option, with an Annuity Lifestyle Approach and Cash Lifestyle Approach available as alternative lifestyle strategies. The BlackRock Cash Fund is also deemed as a default as contributions were temporarily directed to this fund for several months in 2020 (as a result of a temporary fund suspension during the Coronavirus pandemic).

Specified performance based-fees

Where a fee is calculated by reference to the returns from investments held by the Plan and is not calculated by reference to the value of the member's rights under the Plan, the Trustee must state the amount of any such performance-based fees in relation to each default arrangement.

The Plan did not hold any funds where performance based-fees were calculated during the year to 31 December 2025.

Performance Monitoring

The Trustee reviews the performance of the default arrangements against their aims and objectives as part of the investment strategy review and on a quarterly basis. This review includes an analysis of fund performance to check that the risk and return levels meet expectations. The performance of the funds is reviewed against benchmarks and, where relevant, targets that have been agreed with the investment managers.

The Trustee reviews that took place in the year concluded that the default arrangements were performing broadly as expected and in line with the aims and objectives of the strategies as shown in the SIP.

Default arrangement asset allocation

The Trustee is required to disclose the full asset allocations of investments for each default arrangement. The table below shows the percentage of assets allocated in the default arrangement to specified asset classes over the year to 31 December 2025.

(i) Fidelity FutureWise Target Date Fund Strategy (the new Primary Default)

Asset class	Average asset allocation over the year to 31 December 2025 (%)			
	25 years old	45 years old	55 years old	NRA
Cash	0.0	0.0	0.0	2.0
Bonds	0.0	0.0	3.0	66.0
Listed equities	95.0	96.0	97.0	30.0
Property	0.0	0.0	0.0	0.0
Other	5.0	4.0	0.0	2.0

The table below shows the weighted percentage of assets allocated under the new Fidelity FutureWise Target Date Fund default strategy as at 31 December 2025 and the previous UKSPP Drawdown Lifestyle Approach as at 31 December 2024. Members were invested in the previous Default Strategy until June 2025, for the purposes of this illustration, the overall asset allocation has been calculated on the basis of an equal weighting between the two lifestyle strategies.

(ii) Weighted average of Fidelity FutureWise Target Date Fund Strategy and UKSPP Drawdown Lifestyle Approach

Asset class	25 years old	45 years old	55 years old	NRA
Cash	0.1	0.1	0.1	2.9
Bonds	0.0	0.0	1.5	62.2
Listed equities	92.5	93.0	93.5	31.6
Property	4.9	4.9	4.9	1.4
Other	2.5	2.0	0.0	2.0

The table below shows, by specified asset class, the percentage of assets allocated under the previous alternative lifestyle arrangement as at 31 December 2024 (which the Trustee considers to be a suitable proxy for the first half of 2025). Members were invested in this arrangement until June 2025, then members' asset allocations were transitioned to the new Primary Default shown above in chart (i).

(iii) Previous Other Default Strategies – UKSPP Annuity Purchase Lifestyle Approach

Asset class	Average asset allocation over the year to 31 December 2024 (%)			
	25 years old	45 years old	55 years old	NRA
Cash	0.2	0.2	0.2	26.2
Bonds	0.0	0.0	0.0	73.8
Listed equities	90.0	90.0	90.0	0.0
Property	9.8	9.8	9.8	0.0
Other	0.0	0.0	0.0	0.0

The tables below show, by specified asset class, the percentage of assets allocated under the previous alternative lifestyle arrangement as at 31 December 2024 (which the Trustee considers to be a suitable proxy for the first half of 2025). Members were invested in this arrangement until June 2025, then members' asset allocations were transitioned to the new Primary Default shown above in chart (i).

(iv) Previous Other Default Strategies – UKSPP Cash Lifestyle Approach

Asset class	Average asset allocation over the year to 31 December 2024 (%)			
	25 years old	45 years old	55 years old	NRA
Cash	0.2	0.2	0.2	100.0
Bonds	0.0	0.0	0.0	0.0
Listed equities	90.0	90.0	90.0	0.0
Property	9.8	9.8	9.8	0.0

(v) Other Default Strategies – Cash Fund

Asset class	Average asset allocation over the year to 31 December 2024 (%)			
	25 years old	45 years old	55 years old	NRA
Cash	100.0	100.0	100.0	100.0

2. Net investment returns

The Trustee is required to report on net investment returns for each default arrangement and for each non-default fund which Plan members were invested in during the Plan year. Net investment return refers to the investment returns on funds minus all member-borne transaction costs and charges.

The net investment returns have been provided by Fidelity (the Plan's provider) and have been prepared having regard to statutory guidance. They have been calculated on a net asset value to net asset value basis.

It is important to note that past performance is not a guarantee of future performance.

Members were transitioned into the new Fidelity FutureWise Target Date Fund Strategy in June 2025 and the previous default strategies and alternative lifestyle funds were closed. For the previous default strategies performance reported shows 1, 3 and 5 year net investment returns to 31 December 2024 and additional 5 month performance from 1 January 2025 – 31 May 2025.

(i) New Primary Default Strategy – Fidelity FutureWise Target Date Fund Strategy

Performance to 31 December 2025	Annualised returns (%)		
Age of member in 2024	1 year	3 years[2]	5 years[1]
25	15.1	16.7	N/A
45	14.6	16.6	N/A
55	14.9	16.6	N/A
60	12.3	13.9	N/A
65	9.6	9.7	N/A

[1]Five-year performance data is unavailable because the funds have not been in place for a full five-year period.

[2]1 year and 3 year data reported is not applicable to the Plan as members have been invested since the strategy was added to the range in June 2025.

(ii) Previous Primary Default Strategy – UKSPP Drawdown Purchase Lifestyle Approach

Performance to 31 December 2024	Annualised returns (%)			5 months to 31 May 2025 (%)
Age of member in 2023	1 year	3 years	5 years	
25	14.5	6.2	9.5	-0.6
45	14.5	6.2	9.5	-0.6
55	14.5	6.2	9.5	-0.6
60	9.6	3.6	6.9	0.5
65	6.7	1.3	3.4	0.6

(iii) Previous Other Default Strategies – UKSPP Annuity Purchase Lifestyle Approach

Performance to 31 December 2024	Annualised returns (%)			5 months to 31 May 2025 (%)
Age of member in 2023	1 year	3 years	5 years	
25	14.5	6.2	9.5	-0.6
45	14.5	6.2	9.5	-0.6
55	14.5	6.2	9.5	-0.6
60	9.6	3.6	6.9	0.5
65	0.4	-2.6	0.4	-0.5

(iv) Previous Other Default Strategies – UKSPP Cash Lifestyle Approach

Performance to 31 December 2024	Annualised returns (%)			5 months to 31 May 2025 (%)
Age of member in 2023	1 year	3 years	5 years	
25	14.5	6.2	9.5	-0.6
45	14.5	6.2	9.5	-0.6
55	14.5	6.2	9.5	-0.6
60	9.6	3.6	6.9	0.5
65	5.8	2.4	3.5	1.7

(v) Previous Other Default Strategies – UKSPP Cash Fund

Performance to 31 December 2025	Annualised returns (%)		
Fund name	1 year	3 years	5 years
BlackRock Cash Fund	4.3	4.7	3.0

Source: Aon and Fidelity. Returns are quoted net of fees and reflect the Total Expense Ratios (TERs) of the funds as at 31 December 2024. Assumes selected retirement age of 65.

The allocation to the funds underlying the default lifestyle strategies begin to transition once members are 20 years away from their selected retirement age. Members aged 45 and younger are invested in global equities and private assets and therefore experienced strong investment returns over the longer term, as equity markets have delivered strong returns over the last few years. Members closer to retirement have also experienced strong returns, in line with their respective asset class exposure, over the longer term. These members are invested in a more diversified range of assets such as fixed income, alongside an allocation to equities. The Trustee is satisfied with the performance of the funds relative to their investment objectives and longer-term return targets.

(vi) Self-select investment funds

Performance to 31 December 2025	Annualised returns (%)		
Fund name	1 year	3 years	5 years
BlackRock World (ex-UK) Equity Index Fund	14.0	17.6	12.6
BlackRock UK Equity Index Fund	20.1	11.5	10.2
BlackRock Emerging Markets Index Fund[1]	23.4	11.5	N/A
BlackRock ACS World Multifactor ESG Equity Tracker Fund[2]	16.2	14.4	N/A
Mellon Long Term Global Equity Fund	1.5	8.4	6.6
HSBC Islamic Global Equity Index Fund	12.4	22.9	14.8
Fidelity Pension Annuity Fund	5.4	2.7	-4.9
Threadneedle Property Fund	5.2	3.3	3.7
BlackRock Cash Fund	4.3	4.7	3.0
M&G Total Return Credit Investment Fund	4.7	N/A	N/A
HSBC Global Sukuk Bond Fund	0.3	N/A	N/A
Nordea Global Climate and Environment Fund	N/A	N/A	N/A

Source: Fidelity. Returns are quoted net of fees and reflect the TERs of the funds as at 31 December 2025.

[1] Fund launch date is 20 January 2021, therefore the returns for longer-term reporting periods are not available.

[2] Funds added to the self-select fund range in June 2021. As the funds have been in the UKSPP fund range for less than five years, the returns for longer-term reporting periods are currently not applicable.

(vii) Previous self-select investment funds

The table below illustrates the net investment returns of the self-select investment funds which were closed to members in June 2025. 1, 3 and 5 year performance is reported to 31 December 2024 and 5 month performance from 1 January 2025 – 31 May 2025.

Performance to 31 December 2024	Annualised returns (%)			5 months to 31 May 2025 (%)
Fund name	1 year	3 years	5 years	
BlackRock Over 5 Years Index Linked Gilt Fund	-11.1	-18.1	-8.4	-4.4
RBC Global Focus Equity Fund	20.4	-2.9	N/A	-4.0
BlackRock Aquila Life Market Advantage Fund	5.4	-0.8	0.5	0.5
BlackRock Absolute Return Bond Fund	6.3	2.8	2.3	2.7

Source: Fidelity.

3. Member Borne Charges and Transaction costs

The Trustee should regularly monitor the level of charges borne by members through the investment funds. These charges comprise:

- Charges: these are explicit, and represent the costs associated with operating and managing an investment fund. They can be identified as a Total Expense Ratio (TER), or as an Annual Management Charge (AMC), which is a component of the TER;
- Transaction costs: these are not explicit and are incurred when the Plan's fund manager buys and sells assets within

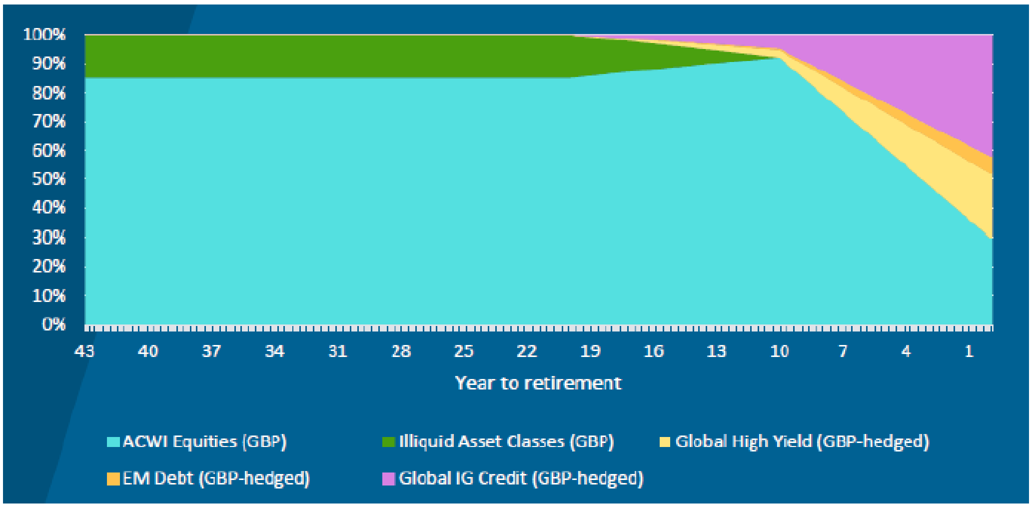
investment funds but are exclusive of any costs incurred when members invest in or sell out of funds.
The Trustee is also required to confirm that the total costs and charges paid by any member in the default arrangements have not exceeded 0.75% p.a., (the charge cap) and produce an illustration of the cumulative effect of the overall costs and charges on members' retirement fund values as required by the Occupational Pension Schemes (Administration and Disclosure) (Amendment) Regulations 2018.

The Trustee has set out the costs and charges that are incurred by members, rather than the employer, over the statement year in respect of each investment fund members were invested in
during the Plan year. These comprise the Annual Management Charge (AMC) / Total Expense Ratio (TER) and insofar as we are able to, transaction costs.
The TER information is readily available to members and can be found in fund factsheets available on Fidelity's PlanViewer website. The TER is deducted each month as a percentage of a member's fund balance. These are explicit costs such as broker commissions and taxes and levies like stamp duty.

Transaction costs are implicit costs incurred within the day-to-day management of the assets by the fund manager. Implicit costs include market dealing spreads, i.e. the difference between the price of a security at the time of an order and the price of a security at the time the deal is struck.
The charges and transaction costs have been supplied by Fidelity, who are the Plan's platform provider. Where transaction costs have been provided as a negative cost, these have been set to zero by the Trustee.

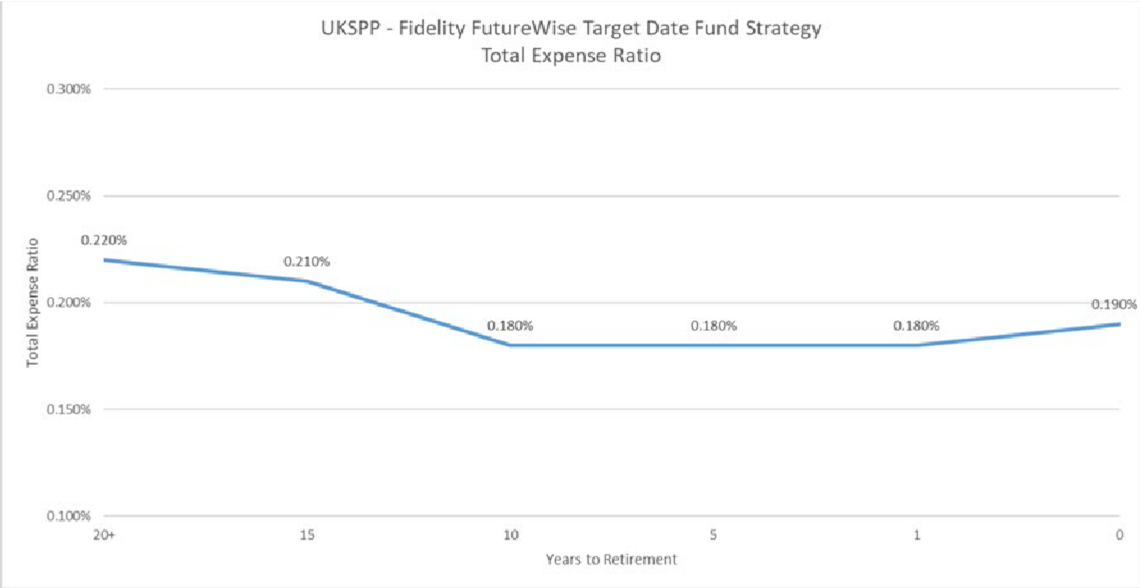
(i) New Default strategy – Fidelity FutureWise Target Date Fund Strategy

The Fidelity FutureWise Target Date Fund Strategy has been implemented during the Plan year as the Plan's default arrangement. Members are invested into a Target Date Fund which allocation changes as members approach their target retirement day. This is illustrated in the chart below. We note that the "illiquid asset classes" is a target allocation, which Fidelity are in the process of gradually building up. The actual allocation to this asset class is currently less than the target.



Source: Fidelity

The TER that a member paid since having been invested in the Target Date Fund strategy depends on their term to retirement, as shown in the line chart below. The TER ranges from 0.180% p.a to 0.220% p.a, which is within the 0.75% p.a charge cap for schemes that are used by employers for auto-enrolling their employees.



Individual funds	TER % p.a.	Transaction Costs % p.a.	Total costs % p.a.
FutureWise Retirement Fund	0.19	0.30	0.49
FutureWise Target 2025	0.18	0.24	0.42
FutureWise Target 2030	0.18	0.28	0.46
FutureWise Target 2035	0.18	0.14	0.32
FutureWise Target 2040	0.18	0.13	0.31
FutureWise Target 2045	0.21	0.13	0.34
FutureWise Target 2050	0.22	0.09	0.31
FutureWise Target 2055	0.22	0.09	0.31
FutureWise Target 2060	0.22	0.09	0.31
FutureWise Target 2065	0.22	0.09	0.31
FutureWise Target 2070	0.22	0.09	0.31

(ii) Previous Default Strategies

The table below illustrates the costs and charges of the previous default strategies. Members were disinvested and transtitioned to the new Default Strategy in June 2025.

Individual funds	TER % p.a.	Transaction Costs % p.a.	Total costs % p.a.
Drawdown Lifestyle Approach (previous primary default)	0.20-0.37	0.06-0.23	0.26-0.60
Annuity Purchase Lifestyle Strategy	0.20-0.38	0.06-0.22	0.26-0.60
Cash Lifestyle Strategy	0.20-0.35	0.02-0.22	0.22-0.57

(iii) Other self-select investment funds

In addition, members also have the option to invest in 12 individual funds (including the BlackRock Cash Fund which is also a default arrangement).

Individual funds	TER % p.a.	Transaction Costs % p.a.	Total costs % p.a.
BlackRock World (ex-UK) Equity Index Fund	0.21	0.05	0.26
BlackRock UK Equity Index Fund	0.21	0.18	0.39
BlackRock Emerging Markets Index Fund	0.40	0.00	0.40
BlackRock ACS World Multifactor ESG Equity Tracker Fund	0.23	0.09	0.32
Mellon Long Term Global Equity Fund	0.94	0.7	1.01
HSBC Islamic Global Equity Index Fund	0.33	0.00	0.33
Fidelity Pension Annuity Fund	0.32	0.00	0.32
Threadneedle Property Fund	0.97	0.00	0.97
BlackRock Cash Fund	0.20	0.02	0.22
M&G Total Return Credit Investment Fund[1]	0.60	0.11	0.71
HSBC Global Sukuk Bond Fund[1]	0.45	0.00	0.45
Nordea Global Climate and Environment Fund[1]	0.85	0.11	0.96

Source: Fidelity. As at 31 December 2025.

[1] Funds added to the self-select fund range in November 2024 following the investment strategy review.

(iv) Previous self-select investment funds

The table below illustrates the costs and charges of the previous UKSPP self-select investment funds which were disinvested and closed to new members in November 2024.

Individual funds	TER % p.a.	Transaction Costs % p.a.	Total costs % p.a.
BlackRock Over 5 Years Index Linked Gilt Fund	0.20	0.00	0.20
RBC Global Focus Equity Fund	0.60	0.08	0.68
BlackRock Aquila Life Market Advantage Fund	0.41	0.24	0.65
BlackRock Absolute Return Bond Fund	0.58	0.84	1.42

Source: Fidelity. As at 31 May 2025.

Illustrations of the cumulative effect of costs and charges

From 6 April 2018, the Occupational Pension Schemes (Administration and Disclosure) (Amendment) Regulations 2018 introduced new requirements relating to the disclosure and publication of the level of costs by the trustees and managers of a relevant scheme. These changes are intended to improve transparency on costs.

In order to help members understand the impact that costs and charges can have on their retirement savings, the Trustee has provided five illustrations of their cumulative effect on the value of typical Plan members' savings over the period to their retirement.

The illustrations have been prepared having regard to statutory guidance, selecting suitable representative members, and are based on a number of assumptions about the future which are set out in the "Assumptions and data for illustrations" section below.

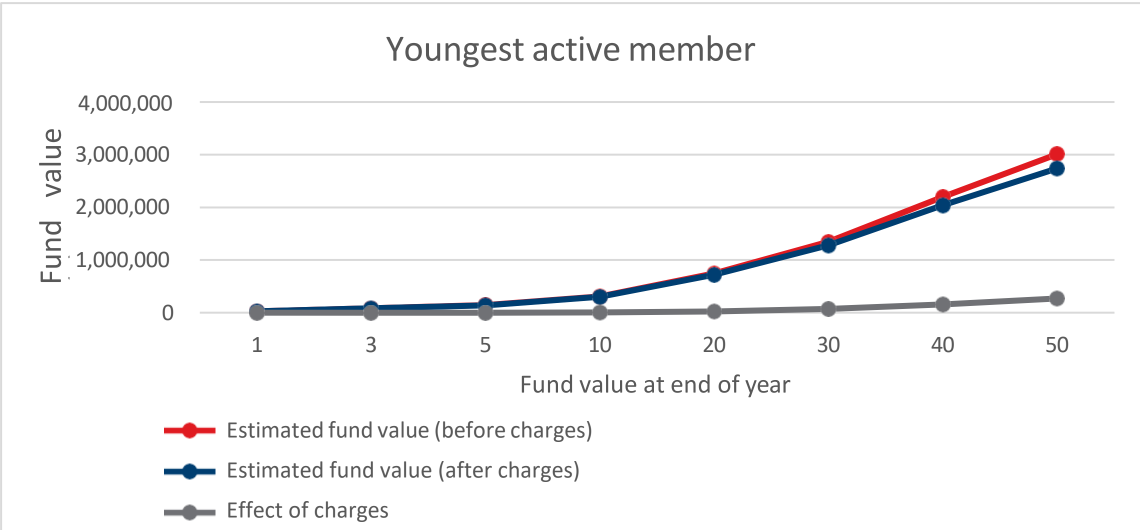
It should be noted that these illustrations are forward looking and are based on the Plan arrangements at the end of the period following the transition of members to Fidelity FutureWise Target Date Fund Strategy.

- Members should be aware that such assumptions may or may not hold true, so the illustrations do not promise what could happen in the future and fund values are not guaranteed. Furthermore, because the illustrations are based on typical members of the Plan they are not a substitute for the individual and personalised illustrations which are provided to members in their annual Benefit Statements. Illustrations A, B and C are shown for typical members invested in the Fidelity FutureWise Target Date Fund Strategy, which is the new Primary Default investment arrangement.

- Illustrations D and E are shown for typical members contributing to the Plan in the Cash Fund (deemed default) and the Plan's lowest and highest charging self-select funds respectively.

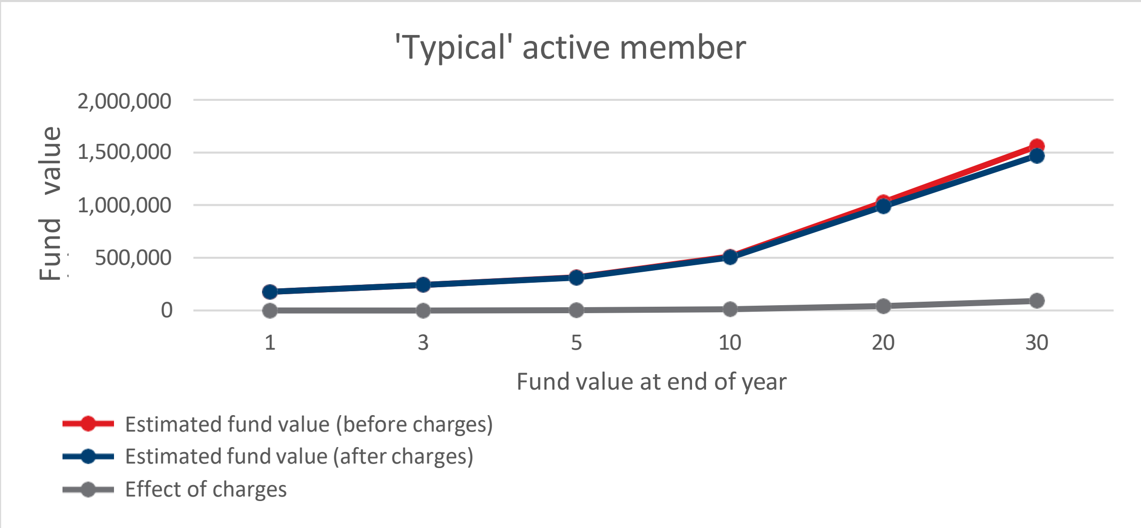
All projected fund values are shown in today's terms and do not need to be reduced further for the effect of future expected inflation.

Illustration A: is based on a new Plan member who has 50 years to go until their selected retirement age and is invested in the Fidelity FutureWise Target Date Fund Strategy. The member has a current fund value of zero and makes contributions of £2,200 per month until they retire.



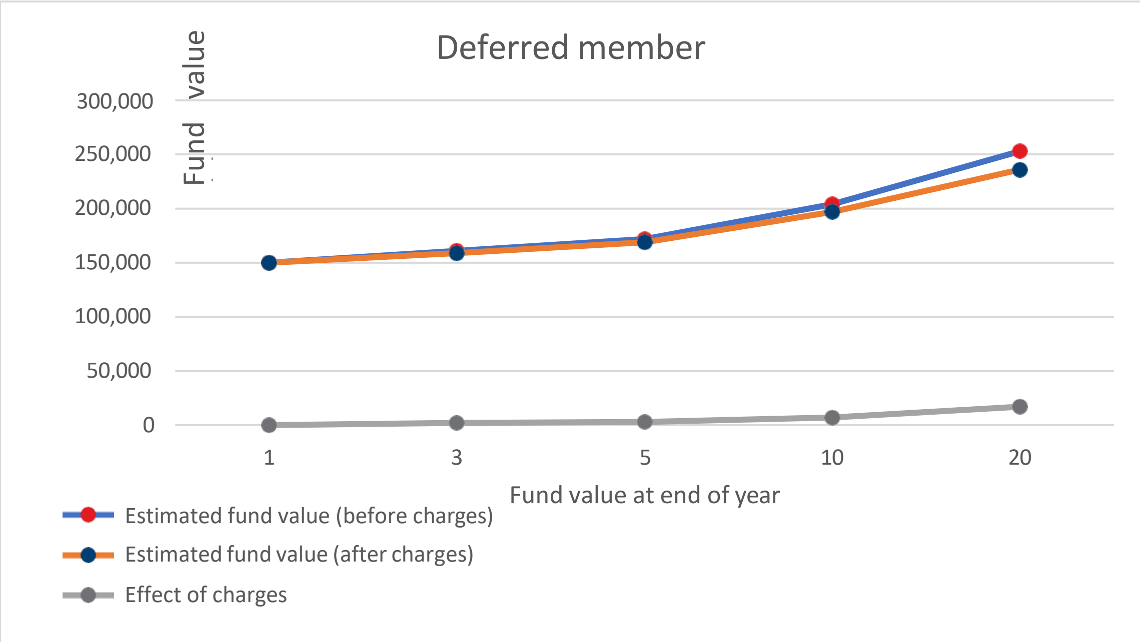
Fund value at end of year	Years until retirement	Estimated fund value (before charges) (£)	Estimated fund value (after charges) (£)	Effect of charges (£)
1	49	26,500	26,500	-
3	47	82,500	82,100	400
5	45	142,000	141,000	1,000
10	40	310,000	305,000	5,000
20	30	745,000	720,000	25,000
30	20	1,350,000	1,280,000	70,000
40	10	2,200,000	2,040,000	160,000
50	0	3,010,000	2,740,000	270,000

Illustration B: is based on an existing Plan member who has 30 years to go until their selected retirement age and is invested in the Fidelity FutureWise Target Date Fund Strategy. The member has a current fund value of £146,000 and makes contributions of £2,200 per month until they retire.



Fund value at end of year	Years until retirement	Estimated fund value (before charges) (£)	Estimated fund value (after charges) (£)	Effect of charges (£)
1	29	177,000	177,000	-
3	27	243,000	242,000	1,000
5	25	315,000	311,000	4,000
10	20	514,000	503,000	11,000
20	10	1,030,000	989,000	41,000
30	0	1,560,000	1,470,000	90,000

Illustration C: is based on a deferred member (a member who is no longer making contributions into their Pension Account) who has 20 years to go until their selected retirement age and is invested in the Fidelity FutureWise Target Date Fund Strategy. The member has a current fund value of £146,000.



Fund value at end of year	Years until retirement	Estimated fund value (before charges) (£)	Estimated fund value (after charges) (£)	Effect of charges (£)
1	19	150,000	150,000	-
3	17	161,000	159,000	2,000
5	15	172,000	169,000	3,000
10	10	204,000	197,000	7,000
20	0	253,000	236,000	17,000

Illustration D: is based on an existing Plan member who has 30 years to go until their selected retirement age and is invested in the Cash Fund (which is the lowest charging self-select fund and a deemed default fund). The member has a current fund value of £146,000 and makes contributions of £2,200 per month until they retire.

Fund value at end of year	Years until retirement	Estimated fund value (before charges) (£)	Estimated fund value (after charges) (£)	Effect of charges (£)
1	29	171,000	170,000	1,000
3	27	221,000	220,000	1,000
5	25	271,000	269,000	2,000
10	20	393,000	388,000	5,000
20	10	629,000	613,000	16,000
30	0	854,000	823,000	31,000

Illustration E: is based on an existing Plan member who has 30 years to go until their selected retirement age and is invested in the Mellon Long Term Global Equity Fund (which is the highest charging self-select fund). The member has a current fund value of £146,000 and makes contributions of £2,200 per month until they retire.

Fund value at end of year	Years until retirement	Estimated fund value (before charges) (£)	Estimated fund value (after charges) (£)	Effect of charges (£)
1	29	177,000	175,000	2,000
3	27	243,000	237,000	6,000
5	25	315,000	302,000	13,000
10	20	514,000	479,000	35,000
20	10	1,030,000	900,000	130,000
30	0	1,750,000	1,430,000	320,000

As younger members are exposed to charges for longer, due to their longer term to retirement, the cumulative impact of charges is higher in percentage terms.

The Trustee believes the charges are competitive based on our knowledge of the broader market and the review of the services provided to members during 2025 (see Value for Members assessment below). The charge illustrations are for information and transparency purposes only, and therefore the Trustee doesn't expect members to take any action in respect of the information above. Members are regularly encouraged to check that their investment choices are suitable to meet their needs.

The illustrations have been prepared having regard to statutory guidance, selecting suitable representative members, and are based on a number of assumptions about the future.

Members are advised to consider both the level of costs and charges and the expected return on investments (ie. the risk profile of the strategy) in making investment decisions.

Assumptions and data for illustrations:

The following assumptions have been made for the purposes of the above illustrations:

1. *Projected fund values are shown in today's monetary terms, which means that they have been adjusted for the effect of future inflation*
2. *Inflation is assumed to be 2.5% each year*
3. *First year contributions are assumed to be £2,200 per month, thereafter increasing annually in line with inflation until retirement*
4. *The assumed growth rates (gross of costs and charges) are as follows:*
    - *Fidelity FutureWise Target Date Fund Cash Allocation 2.00%*
    - *Fidelity FutureWise Target Date Fund Bond Allocation 2.00%*
    - *Fidelity FutureWise Target Date Fund Equity Allocation 6.00%*
    - *Fidelity BlackRock Cash Fund 2.00%*
    - *Fidelity Mellon Long Term Global Equity 6.00%*
5. *Values shown are estimates and are not guaranteed*

For full details of the assumptions made, see the 'Further notes and assumptions' section here:
https://retirement.fidelity.co.uk/about-workplace-pensions/investing/costs-and-charges/SHEL

4. Value for Members assessment

The Administration Regulations require the Trustee to assess charges and transaction costs borne by members and the extent to which those charges and costs represent good value for money for members.

There is no legal definition of "good value" or the process of determining this for Plan members. Therefore, working in conjunction with our advisers, Aon, the Trustee has developed its cost-benefit analysis framework to assess as to whether our members receive good value from the Plan relative to the costs and charges they pay.

The costs that members pay have been identified as TERs and Transaction Costs and are set out in section 3 of this statement. The Trustee has considered the benefits of membership under the following five categories: Plan governance, investments, administration and member experience, member communications and engagement and Retirement support. Benchmarking relative to other pension arrangements or industry best practice guidelines is also undertaken.

The Trustee beliefs have formed the basis of the analyses of the benefits of membership. These are set out below along with the main highlights of their assessment.

Plan governance

The Trustee believes in having robust processes and structures in place to support the effective management of risks and ensure members' interests are protected, increasing the likelihood of good outcomes for members

The arrangements in place are robust and sufficiently flexible to enable the Trustee to make considered, timely decisions in the members' interests.

Investments

The Trustee believes that a well-designed investment portfolio that is subject to regular performance monitoring and assessment of suitability for the membership will make a large contribution to the delivery of good member outcomes

The Plan offers the Fidelity FutureWise Target Date Fund strategy and self-select funds covering a range of member risk profiles and asset classes. The investment funds available have been designed, following advice from the Trustee's investment adviser, with the specific needs of members in mind (e.g. consideration of member targets, variety of self-select funds in different risk brackets and considerations for ESG-focussed funds).

Administration and member experience

The Trustee believes that good administration and record keeping play a crucial role in ensuring that Plan members receive the retirement income due to them. In addition, that the type and quality of service experienced by members has a bearing on the level of member engagement.

The service received from Fidelity (as the Plan's administrator) is of high quality. The Trustee obtains information to assess the member experience through Fidelity's administration services. There are sufficient checks in place for monitoring and reporting on the standard of administration and to ensure that when administrative errors do occur, members are not disadvantaged as a result.

Member communications and engagement

The Trustee believes that effective member communications and delivery of the right support and tools help members understand and improve their retirement outcomes.

The communications members receive are appropriate with members having access to information via post, emails, webinars and a suite of online resources. Communications are often targeted at specific membership categories. The Trustee seeks ways of improving engagement, such as the interactive annual newsletter, simpler electronic benefit statements, and tailored video statements. In 2025, Fidelity commenced reviewing the format and content of its annual benefit statements in collaboration with an external specialist and the 2026 statements are expected to have a revised design. The Trustee will continue to monitor the impact of these different types of engagement.

Retirement support

The Trustee believes it is important to have retirement processes that enable members to make informed decisions and select the appropriate option(s) at retirement.

The Plan offers appropriate support to enable members to make informed retirement decisions, these include access to modelling tools, calculators and supporting information through Fidelity's PlanViewer platform and administration team. The Trustee continues to monitor how members are taking their pots at retirement to understand whether any action is required in relation to retirement support.

The Trustee undertook a review of Fidelity's Retirement Master Trust to signpost members to a decumulation product at the point they retire and implemented this during 2025.

Member borne costs and charges

The Trustee's assessment concludes that the charges and transaction costs borne by Plan members represent good value for members relative to the benefits of Plan membership. Aon has commented that the AMC and TER charges are competitive when compared to current market rates on a like for like basis and adjusting to take account of the benefits of the Plan's membership.

5. Processing of Core Financial Transactions

The Trustee has a specific duty to ensure that core financial transactions are processed promptly and accurately. Core financial transactions include the investment of contributions, transfer of member funds into and out of the Plan, transfers between different investments within the Plan and payments to and in respect of members/beneficiaries.

The bulk of the core financial transactions are undertaken on behalf of the Trustee by the Plan administrator, Fidelity and the Company is responsible for ensuring that contributions are paid to the Plan promptly. The timing of such payments is monitored by the Trustee from quarterly administration reports submitted by Fidelity.

To determine how well the administration is performing, the Trustee has service level agreements ("SLA") in place with Fidelity. These SLAs detail a number of key administration processes to be performed and the target timescale within which each of these processes needs to be completed. There are SLAs in place for all core financial transactions. Under the current SLA, Fidelity aims to accurately complete all financial transactions within 5 working days, with the exception of the investment of contributions, which is within 2 working days of receipt.

The Trustee measures the administrator's performance against the SLAs in quarterly reviews and has regular conversations with the administrator to have oversight of the key processes in order to minimise the risks of inaccurate or late payment or processing of core financial transactions and to help it meet its SLAs.

The Trustee has also reviewed the key processes adopted by the administrator and output in order to minimise the risks of inaccurate or late payment of core financial transactions. Key processes include:

- A full member and Plan reconciliation being undertaken annually as part of the annual preparation of the Trustee Report & Accounts – in previous exercises these have led to actions such as targeted member communications
- Provision of quarterly administration reports – enabling the Trustee to check core financial transactions and review processes relative to any member complaints made – The Trustee notes SLAs continue to be met and issues are escalated promptly where necessary
- Monthly contribution checks and daily reconciliation of the Trustee's bank account
- Checks for all investment and banking transactions prior to processing
- Straight-through processing for data, therefore, avoiding the need for manual intervention and, in turn, significantly reducing the risk of error.
- Annual data reviews – the 2025 review based on Fidelity metrics reported the Plan's scores continue to be very good, and the main area for improvement is missing addresses, primarily for deferred members
- Documentation and operation in line with quality assurance policies and procedures
- Operation in line with the Business Continuity Plan and confirmation that the administrator has prioritised core

financial transactions during this period.
- Member complaints

In addition, the Trustee Services Unit meets with Fidelity on a monthly basis to discuss the administration of the Plan. These meetings provide an opportunity to discuss any issues that might arise (the resolution of which is tracked in an issues log). Fidelity has confirmed that there are processes in place for each core financial transaction to ensure that all Plan transactions are processed in a timely manner and accurately. An automated daily sales and redemptions report is used to check transactions placed the previous day. The report captures the sale type, date and details of units sold, enabling a check that processes are completed in an accurate and timely fashion (and are in line with SLAs)

Fidelity has an internal audit function, in addition to the external audit carried out on the Plan annually. The design and operating effectiveness of Fidelity's internal controls around its pension administration and relevant IT services are tested annually by an external auditor. Fidelity also provides an annual report to the Board reporting on the quality and accuracy of common and conditional data which includes the processing of core scheme financial transactions and monitoring and controls.

The Trustee is satisfied that over the period:

- the administrator was operating appropriate procedures, checks and controls and operating within the agreed SLA;
- there have been no material administration errors in relation to processing core financial transactions; and
- key core financial transactions have been processed promptly and accurately during the Plan year.

6. Trustees' Knowledge and Understanding

Sections 247 and 248 of the Pensions Act 2004 set out the requirement for Trustees to have appropriate knowledge and understanding of the law relating to pensions and trusts, the funding of occupational pension schemes, investment of scheme assets and other matters to enable them to exercise their functions as Trustees properly. This requirement is underpinned by guidance in the Pension Regulator's Code of Practice 7.

The Trustee has processes and procedures in place to meet the Pension Regulator's Trustee Knowledge and Understanding requirements (as set out in their Code of Practice No 7); which include:
- A structured onboarding programme for newly appointed Trustee directors including completion of the Pension Regulator's Trustees toolkit, which is an online learning programme.
- Regular training on topical issues relating to regulatory/legislative developments or items on the Trustee workplan.
- A look ahead to future training needs
- Maintaining training logs for each Trustee director which supports the above.
- During the Plan year to which this statement relates, there were 5 changes (three appointments and two resignations) to the Trustee Board. The newly appointed Directors received structured onboarding training in line with this approach. Copies of Plan documents are provided as part of the onboarding training by the Trustee on a regular basis.

During 2025 the Trustee Board carried out the following:
- Completed the triennial investment strategy review process (demonstrating the requirement to understand the principles relating to the funds and investment of occupational DC schemes and to have a working knowledge of the current SIP).
- Received training from Aon on the Pensions Scheme Bill (demonstrating the requirement to have sufficient

knowledge and understanding of principles relating to the investment of DC schemes).

- Received training from Aon on DC Governance and Investment for the new Board members (demonstrating the requirement that their combined knowledge and understanding, together with available advice, enables them to properly exercise their functions).
- Received training from WTW on The Pensions Regulator's General Code of Practice (demonstrating the requirement to have sufficient knowledge and understanding of the law relating to pensions and trusts).
- Received Aon's DC on the Horizon paper at each quarterly meeting, providing short updates on topical items and legislative updates (demonstrating the requirement to have sufficient knowledge and understanding of the law relating to pensions and trusts).
- Reviewed Aon's performance against the formalised investment consultant objectives.

The Trustee has engaged with their professional advisers regularly throughout the year to ensure that they exercise their functions properly and take professional advice where needed. In exercising its functions this has required knowledge of key Plan documents such as the Trust Deed & Rules, Trustee Report & Accounts, Statement of Investment Principles and all documents setting out the Trustee's current policies. A few of the areas that support this statement are set out below:

- Sign off of the Trustee's Report and Accounts
- Updating the risk register
- Reviewing and updating the Trustee governance framework for the Plan
- Annual review of the existing Data Protection & Cyber Security Policy and Privacy Notice in line with General Data Protection Regulations.

The Trustee Board is made up of six members with a range of skills and experiences including a mixture of Member Nominated and Company Nominated Directors with varying backgrounds.

The Trustee collectively believes it has sufficient knowledge and understanding of the law relating to pensions and trusts and the relevant principles relating to the funding and investment of occupational schemes.

The Trustee considers that it meets the Trustee Knowledge and Understanding requirements and is confident that its combined knowledge and understanding, together with the support of its advisers, enables it to properly exercise its functions as the Trustee of the Plan.

Signed on behalf of the Trustee of the UK Shell Pension Plan

Name Parminder Kohli

Signature DocuSigned by: Parminder Kohli EED0B75ED0EF49E...

Date Jul 23, 2026 and Jul 24, 2026

Implementation statement

The purpose of the Implementation Statement ("IS") is for us, the Trustee of the UK Shell Pension Plan (the "Trustee"), to explain what we have done during the year ending 31 December 2025 to achieve certain policies and objectives set out in the Statement of Investment Principles ("SIP"). It includes:

1. A summary of any review and changes made to the SIP over the year; and
2. How our policies in the SIP have been followed during the year; and
3. How we have exercised our voting rights or how these rights have been exercised on our behalf, including the use of any proxy voting advisory services.

Our conclusion

Based on the activity we have undertaken during the year, we believe that the policies set out in the SIP have been implemented effectively.

In our view, most of the Plan's material investment managers were able to disclose good evidence of voting and engagement activity, and the activities completed by our managers align with our stewardship expectations, and that they are exercising voting rights on our behalf in an appropriate manner.

Over the year to 31 December 2025, the majority of the Plan's assets were transferred to the Fidelity FutureWise investment strategy, with the move completing in June 2025. As assets were invested in both the previous Primary Default and the new Fidelity FutureWise Primary Default for a material part of the year, this report includes voting and engagement data for both strategies.

Changes to the SIP during the year

The Trustee formally reviews the SIP at least every three years, or after any significant change in investment policy, or member demographics.

The SIP was updated over the Plan year to 31 December 2025 to incorporate the Trustee's policy on illiquid assets.

The latest version of the SIP is available for members to view via the Plan website here:

https://pensions.shell.co.uk/pension-plan.html

What is stewardship?

Stewardship is investors using their influence over current or potential investees/issuers, policy makers, service providers and other stakeholders to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society.

This includes prioritising which ESG issues to focus on, engaging with investees/issuers, and exercising voting rights.

Differing ownership structures means stewardship practices often differ between asset classes.

Source: UN PRI

How the policies in the SIP have been followed

The Trustee outlines in the SIP a number of key objectives and policies. These are noted below together with an explanation of how these objectives have been met and policies adhered to over the course of the year.

The Trustee recognises that the key source of financial risk (in relation to members meeting their objectives) normally arises from asset choice. The Trustee therefore retains responsibility for the investment funds made available to the membership and takes expert advice as required from its professional advisors.

Over the year, the Trustee has made available to members a comprehensive selection of investment strategies. This includes a Default Option alongside a range of self-select funds that cover a range of asset classes, enabling members to construct a portfolio to meet their individual investment objectives and beliefs. Full details of these are documented in the Plan's SIP.

Following the completion of the triennial investment strategy review in 2024, the Trustee implemented the Fidelity FutureWise as the new Primary Default Option, replacing the previous strategy. The transition was completed in June 2025.

The Trustee undertook a full review of the self-select fund range as a part of the 2024 investment strategy review. Following this, the Trustee closed the BlackRock Absolute Return Bond Fund, BlackRock Aquila Life Market Advantage Fund, BlackRock Over 5 Year Index Linked Gilt Fund and RBC Global Focus Fund. Implementation was completed in June 2025.

The Trustee monitors those investments used by the Plan to consider the extent to which the investment strategy and decisions of the investment managers are aligned with the Trustee's policies as set out in the SIP, including those related to environmental, social and governance matters that may have a financial impact on the investment returns and risk (including financial risk from climate change).

The Trustee receives comprehensive quarterly investment monitoring reports from its investment advisor, Aon, covering the self-select fund range. These reports are reviewed and discussed by the Trustee at its quarterly meetings, with input from Aon, and provide an opportunity for any issues to be raised and action agreed. In addition, Aon provides ongoing correspondence on investment matters.

The quarterly investment reports include a summary of recent market performance and developments, alongside self-select fund assets and performance relative to their stated benchmark. The report includes detailed fund ratings provided by the Trustee's investment advisor and a brief summary of relevant developments regarding the funds and managers.

Fidelity, the investment manager for the Fidelity FutureWise strategy provides quarterly investment summary reports and will attend quarterly Trustee meetings to provide updates on the performance and development of the Default Option. The Trustee has the opportunity to raise any questions. Aon assists the Trustee in providing oversight and challenge to Fidelity.

The investment information provided by both Aon and Fidelity is supplemented with periodic meetings with the underlying investment managers, which provides an opportunity to discuss fund performance in more detail. The Trustee also uses these meetings as an opportunity to discuss how the underlying investment managers are taking into account ESG considerations in their investment process.

Any investment funds that were not performing as expected were considered in more detail.

Outside of the quarterly investment reports, the Trustee's investment advisor provides updates on any changes to its ratings of the underlying fund managers used by the Plan.

The quarterly investment reports included ESG scores for most of the self-select investment managers, as well as confirming whether each investment manager is a signatory to the UN Principles for Responsible Investment. In this way the Trustee kept the ESG credentials and policies of its investment managers under review throughout the year.

Following the end of the Plan year, the Trustee requested stewardship records from its investment managers for both the Default Option and the self-select fund range, relating to their exercise of voting rights and engagement with investee companies over the year. This information is presented later in this Statement.

The Trustee manages the Plan investments with the aim of providing positive retirement outcomes for members. It believes that Responsible Investment is key to achieving long term sustainable returns and that adopting a Responsible Investment approach is likely to improve risk-adjusted returns.

The Trustee has integrated responsible investment into its investment strategies to reflect its agreed Responsible Investment beliefs. In particular:

- Responsibility for implementation of responsible investment within Fidelity FutureWise is delegated to Fidelity. The strategy has a tilt towards companies that Fidelity believes are leaders or improvers within the ESG space and reduces exposure to laggards. In addition, the strategy has a focus on carbon targets, aiming to reduce portfolio carbon emissions year-on-year (for both equities and fixed income components), with a target to reach net zero within the strategy by 2050.
- The Nordea Global Climate & Environment Fund is made available via the self-select range to provide members with an active equity option that seeks to generate both investment returns and positive impacts on the environment and society.

The Trustee collects information on all the member-borne costs and charges on an annual basis, where available, and sets these out in the Annual Chair's Statement regarding DC Governance

During the Plan year, the Trustee collected data from its investment managers on all the member borne costs incurred in 2025 (including portfolio turnover costs). These were reported and published in the Annual Chair's Statement. No costs were identified as being out of line with expectations or with comparable funds.

Our Engagement Action Plan

Based on the work we have done for the IS, we have decided to take the following steps over the next 12 months:

1. We will continue to engage with Fidelity on their approach to Stewardship in the FutureWise strategy.
2. We will continue to monitor the ESG credentials of our managers through Aon's quarterly monitoring report and periodic updates.

Our managers' voting activity

Good asset stewardship means being aware and active on voting issues, corporate actions and other responsibilities tied to owning a company's stock. We believe that good stewardship is in the members' best interests to promote best practice and encourage investee companies to access opportunities, manage risk appropriately, and protect shareholders' interests. Understanding and monitoring the stewardship that investment managers practice in relation to the Plan's investments is an important factor in deciding whether a manager remains the right choice for the Plan

Why is voting important?

Voting is an essential tool for listed equity investors to communicate their views to a company and input into key business decisions.

Resolutions proposed by shareholders increasingly relate to social and environmental issues

Source: UN PRI

Voting rights are attached to listed equity shares, including equities held in multi-asset funds. We expect the Plan's equity-owning investment managers to responsibly exercise their voting rights.

Voting statistics

The table on the next page shows the voting statistics for each of the Plan's material funds with voting rights for the year to 31 December 2025.

Funds	Number of resolutions eligible to vote on	% of resolutions voted	% of votes against management	% of votes abstained from
BlackRock – ACS World (ex-UK) Equity Index Fund	23,799	98.0%	4.8%	0.5%
BlackRock – ACS UK Equity Index Fund	9,473	99.5%	2.7%	0.0%
BlackRock – Emerging Markets Index Fund	36,990	98.9%	15.6%	2.1%
BlackRock – Aquila Life Market Advantage Fund	18,389	93.2%	3.8%	0.7%
BlackRock – ACS World Multifactor ESG Equity Tracker Fund	3,816	92.2%	3.6%	0.5%
BNY Mellon (Walter Scott & Partners Limited) – BNY Mellon Long Term Global Equity Fund	649	100.0%	5.5%	0.0%
Fidelity International – FutureWise Target 2025 Fidelity International –FutureWise Retirement Aggregator Fund	17,364	98.4%	3.0%	0.3%
Fidelity International – FutureWise Target 2030 Fidelity International – FutureWise Target 2035	17,618	98.4%	3.0%	0.3%
Fidelity International – FutureWise Target 2040	20,478	98.6%	2.9%	0.3%
Fidelity International – FutureWise Target 2045	17,618	98.5%	3.0%	0.3%
Fidelity International – FutureWise Target 2050 Fidelity International – FutureWise Target 2055 Fidelity International – FutureWise Target 2060 Fidelity International – FutureWise Target 2065 Fidelity International – FutureWise Target 2070	17,195	98.3%	3.0%	0.3%
Fidelity International – FutureWise Target 2040	20,478	98.6%	2.9%	0.3%
HSBC – Islamic Global Equity Index Fund	1,627	97.3%	15.7%	0.4%
Nordea Asset Management – Global Climate and Environment Fund	776	100.0%	10.1%	1.3%
RBC Global Asset Management – Global Equity Focus Fund[1]	691	95.1%	4.9%	0.0%

Source: Investment Managers. Please note that the 'abstain' votes noted above are a specific category of vote that has been cast, and are distinct from a non-vote.

[1] Voting data for the RBC Global Equity Focus Fund is based on the year to 31 December 2025, while the fund was closed in June 2025.

Use of proxy voting advisers

Many investment managers use proxy voting advisers to help them fulfil their stewardship duties. Proxy voting advisers provide recommendations to institutional investors on how to vote at shareholder meetings on issues such as climate change, executive pay and board composition. They can also provide voting execution, research, record keeping and other services. Responsible investors will dedicate time and resources towards making their own informed decisions, rather than solely relying on their adviser's recommendations.

The table below describes the Plan managers' voting policies, including the use of proxy voting advisers.

> **Why use a proxy voting adviser?**
> Outsourcing voting activities to proxy advisers enables managers that invest in thousands of companies to participate in many more votes than they would without their support.

Managers	Description of use of proxy voting advisers *(in the managers' own words)*
BlackRock (Underlying fund manager for Fidelity FutureWise)	BlackRock Investment Stewardship leverages Institutional Shareholder Services ("ISS") as an external proxy services vendor. ISS' electronic voting platform allows BlackRock Investment Stewardship to monitor voting activity, execute proxy vote instructions, record keep, and generate client and regulatory voting reports. BlackRock Investment Stewardship also uses Glass Lewis' services to support research and analysis. In addition to the global research provided by ISS and Glass Lewis, BlackRock Investment Stewardship subscribes to market-specific research providers including Institutional Voting Information Service in the UK, Ownership Matters in Australia, Stakeholder Empowerment Services in India, and ZD Proxy in China.
BNY Mellon (Walter Scott & Partners Ltd)	Walter Scott receives third party research from ISS for information purposes. However, the recommendations from any intermediary have no bearing on how Walter Scott votes.
HSBC	We use the voting research and platform provider ISS to assist with the global application of our own bespoke voting guidelines. ISS reviews company meeting resolutions and provides recommendations highlighting resolutions which contravene our guidelines.
Nordea	Two external proxy advisors – ISS and Glass Lewis. ISS is used for proxy voting, execution as well as research, while Glass Lewis is mainly used for research. We evaluate our proxy advisors regularly on operational integrity, quality of research and the implementation of the custom voting policy.
RBC	RBC Global Asset Management ("GAM") retains the services of ISS to manage and execute proxy votes. In addition, ISS provides custom voting recommendations for proxies based on

Source: Investment Managers

Significant voting examples

To illustrate the voting activity being carried out on our behalf, we asked the Plan's investment managers to provide a selection of what they consider to be the most significant votes in relation to the Plan's funds. A sample of these significant votes can be found in the appendix.

<u>Our managers' engagement activity</u>

Engagement is when an investor communicates with current (or potential) investee companies (or issuers) to improve their ESG practices, sustainability outcomes or public disclosure. Good engagement identifies relevant ESG issues, sets objectives, tracks results, maps escalation strategies and incorporates findings into investment decision-making.

The table below shows some of the engagement activity carried out by the Plan's material managers. The managers have provided information for the most recent calendar year available.

<table>
<tr><th>Managers</th><th>Engagement Policy</th></tr>
<tr><td>BlackRock</td><td>BlackRock considers engagement to be at the core of its stewardship efforts. It enables BlackRock to provide feedback to companies and build a mutual understanding about corporate governance and sustainable business practices. Each year, BlackRock sets engagement priorities to focus on, such as governance and sustainability issues that it considers to be most important for companies and its clients.

BlackRock's priorities reflect an emphasis on board effectiveness and the impact of sustainability-related factors on a company's ability to generate long-term financial returns. BlackRock's stated key engagement priorities include board quality, climate and natural capital, strategy purpose and financial resilience, incentives aligned with value creation and company impacts on people.</td></tr>
<tr><td>Threadneedle Asset Management Limited (Threadneedle)</td><td>Threadneedle engages with stakeholders to support long-term investment returns by mitigating risk, capitalising on opportunities linked to ESG factors, and reducing any material negative impact that their investment decisions could have on these factors.

Their engagements focus on financial performance, sustainability risks and opportunities, operational excellence, capital allocation policies and managerial incentives, among other topics. Collaboration across asset classes and thematic and sectoral disciplines ensures an informed approach. Their engagement programme is structured around seven high level themes:
▪ Climate change
▪ Environmental stewardship, including biodiversity
▪ Labour standards
▪ Human rights
▪ Public health
▪ Business conduct
▪ Corporate governance
Threadneedle sets clear objectives ahead of each engagement meeting and tracks them on a regular basis. It shares the research and outcomes from its engagements globally across the firm.</td></tr>
<tr><td>Fidelity International (Fidelity)</td><td>Fidelity's stewardship policies and activities are monitored by the Sustainable Investing Operating Committee (SIOC). SIOC is responsible for applying, implementing and overseeing sustainable investing across Fidelity's business units. This includes the overall strategic direction, policy formulation, external representation, product, business growth, investment integration, exclusion lists and day-today operational delivery. SIOC is responsible for conducting, overseeing and executing ownership rights in investee issuers, including engagement and proxy voting activities. It also has oversight of conflicts of interest.
Fidelity's engagement process is designed to be well-defined and transparent. The following components are identified at the outset:
▪ Key issue areas: the themes that the company needs to demonstrate improvement on (e.g. climate change);</td></tr>
</table>

Managers	Engagement Policy
	▪ Objective: the ultimate desired outcome from engagement (e.g. reduced CO2 intensity); ▪ Milestones: indications that the company is making efforts to achieve the objective Fidelity have communicated (e.g. setting a carbon reduction target); ▪ Key Performance Indicator ("KPIs"): there should be measurable KPIs for each milestone; ▪ Timeline: the timeframe in which Fidelity can reasonably expect a company to improve; and Status: a point-in-time measure of progress (for example, no progress, some progress, or success).
Walter Scott & Partners Ltd – BNY Mellon ("Walter Scott")	Walter Scott distinguishes between two types of engagements: engagement for information and engagement for change. Engagement for information typically involves a meeting or correspondence to exchange information. Engagement for change is typically a series of one-to-one meetings and correspondence, where it seeks to influence with a defined objective. An engagement for change will often relate to sustainability issues and are very often long-term in nature, involving numerous meetings with management and close monitoring of progress. Given the rigour of its analysis before making an initial investment, Walter Scott finds the need to engage for change relatively limited when compared with engaging for information.
HSBC Global Asset Management (HSBC)	Engagement with investee companies and other issuers is an important element in both HSBC's ESG integration and their stewardship oversight. HSBC expect companies and other issuers in which they invest to provide effective stewardship. HSBC engage with them for better understanding, to monitor their clients' investments, and to encourage them to be pro-active and transparent in the management of ESG and other risks. HSBCs engagement activities include: ▪ Challenging companies and issuers of their delivery of corporate strategy. ▪ Engaging to understand the approach management is taking and test how far they are being good stewards. ▪ Raising ESG or other concerns with companies and other issuers where they believe that to be in the best interests of investors. ▪ Prioritising engagement based on the scale of client holdings, salience of issues concerned and overall exposure to certain issues. ▪ Engaging with both executive and non-executives of members of the board. Engagement is undertaken through meetings, conference calls and correspondence. HSBC occasionally co-file shareholder resolutions and support or deliver statements at shareholder meetings to communicate publicly with companies and escalate their engagement.

Managers	Engagement Policy
M&G Investments	M&G believe that the long-term success of companies is supported by effective investor stewardship and high standards of corporate governance. They believe that if a company is run well, and sustainably, it is more likely to be successful in the long run. Where applicable, as an active fund manager, M&G Investments engages with companies to add value to the investment process, to increase their understanding, or provide feedback to a company. Engagements are focussed on achieving real world outcomes. M&G focus on the underlying substance of their engagement, delivery of their engagement objectives and the relevance for the investment decision when assessing the quality and effectiveness of an engagement. M&G may engage as an equity holder or as a fixed income investor to protect their clients' interests before and during the course of an instrument's life. If this is an ESG engagement, their aim is to influence company behaviour or disclosure. As investors in private or illiquid asset classes, or where there is an intention to hold the asset to maturity, M&G undertake due diligence and engagement prior to, and throughout, investment on the basis that the ability to add value occurs during the investment decision-making process and that engagement is a more constructive decision than divestment.
Nordea Asset Management	Nordea's engagement activities entail constructive dialogues with companies through face-to-face meetings, conference calls, letters or even field visits. As such, it provides an opportunity to improve their understanding of companies that they invest in as well
	as the ability to influence them. Nordea engages proactively with companies and other stakeholders on behalf of all internally-managed Nordea funds. Nordea's engagement activities are carried out on behalf of all their funds, and follow this process: ▪ Engagement selection process ▪ Engagement plan with objective ▪ Research and meeting ▪ Report progress or escalate The effectiveness of the different tools depends on the individual engagement case. Engagement is always their preferred approach, but the ultimate tool is exclusion of the company from all Nordea's portfolios. The Responsible Investment Committee can decide to exclude a company if its operations are incompatible with Nordea's responsible investment policy or if the company does not respond to their engagement efforts. In addition to individual engagement cases, Nordea also collaborate with other investors. Collaborative engagements often address a specific topic, and Nordea might take the role of lead investor in companies where their investments are substantial.

Managers	Engagement Policy
RBC Global Asset Management ("RBC")	RBC believe that issuers that manage their material ESG risks and opportunities effectively are more likely to outperform on a risk-adjusted basis over the long term. RBC's approach to engagement reflects this belief, as they engage in dialogue with issuers over time and participate in initiatives that aim to increase transparency and foster fair and efficient markets for the benefit of investors and clients globally. Engagement cases are prioritised based on the materiality of the ESG issue to the specific investment. Teams may also prioritise their engagement efforts based on the size of the investment and/or the level of ESG risk within the portfolio. Typically, the objectives of RBC's ESG-related engagements include: • information gathering on material ESG risks and opportunities and the steps the issuer is taking to address them; • seeking better public disclosure of material ESG risks and opportunities and the steps the issuer is taking to address them; • encouraging more effective management of material ESG factors, when it is believed they may impact the value of the investment; and • where an issuer is lagging its peers on a material ESG issue, requesting a commitment for change, monitoring any changes, and encouraging continued improvements that are expected to positively impact the long-term value of the investment.

Source: Investment Managers

Data limitations

At the time of writing, the following managers did not provide all the information we requested:

- BlackRock and Fidelity did provide fund level engagement information, but not in the industry standard Investment Consultants Sustainability Working Group ("ICSWG") template. Additionally, the manager did not provide any engagement case studies.
- Threadneedle did not provide fund level engagement case studies.

This report does not include commentary on certain asset classes such as illiquid assets or gilts, because of the limited materiality of stewardship to these asset classes.

Engagement examples

To illustrate the engagement activity being carried out on our behalf, we asked the Plan's investment managers to provide a selection of engagement examples. A sample of these examples can be found in the appendix.

Appendix – Significant Voting and Engagement Examples

In the table below are some significant vote examples provided by the Plan's managers. We consider a significant vote to be one which the manager considers significant. Managers use a wide variety of criteria to determine what they consider a significant vote, some of which are outlined in the examples below.

BlackRock

For all the examples below, BlackRock confirmed that they endeavour to communicate to companies when they intend to vote against management, either before or just after casting votes in advance of the shareholder meeting. BlackRock publish their voting guidelines to help clients and companies understand their thinking on key governance matters that are commonly put to a shareholder vote.

Voting example: BlackRock – ACS World (ex-UK) Equity Index Fund – Amazon.com, Inc.

In May 2025, BlackRock voted against a shareholder proposal relating to publication of report on impact of data centres on climate commitments.

BlackRock voted this way as they believe that the company already provides sufficient disclosure and/or reporting regarding this issue, or is already enhancing its relevant disclosures, including its efforts to integrate AI-related infrastructure into its climate-related strategy. As an outcome, this shareholder proposal failed.

Voting example: BlackRock – Emerging Markets Index Fund – CTBC Financial Holding Co., Ltd.

In June 2025, BlackRock voted against a shareholder proposal relating to election of John-Leon, Koo, a representative of Chung Yuan Investment Co., Ltd. as non-independent director.

BlackRock voted this way as they believe that it is not in the best interests of shareholders to have this particular director on this board. However, this shareholder proposal passed.

Voting example: BlackRock – Aquila Life Market Advantage Fund – Thermo Fisher Scientific Inc.

In May 2025, BlackRock voted against a shareholder proposal to amend the right to call special meeting.

BlackRock voted this way as they believe that the one-year holding requirement to call a special meeting of shareholders is a reasonable safeguard against the ineffective use of corporate resources, as well as the risk that a special meeting may be called by shareholders who have amassed the required threshold of shares in a relatively short period of time to advance interests that may conflict with those of long-term shareholders. BlackRock also believed this proposal was not in the best interest of shareholders. As an outcome, this shareholder proposal failed.

Voting example: BlackRock – ACS World Multifactor ESG Equity Tracker Fund; BlackRock – ACS UK Equity Index Fund – The Sage Group plc.

In February 2025, BlackRock voted in favour of a shareholder proposal relating to approval of proposed amendments to remuneration policy.

BlackRock voted this way as they believe that the company's remuneration arrangements are poorly structured and there was poor use of remuneration committee discretion regarding increases. The company updated its program following significant growth in its business, and related efforts to ensure such policies remained competitive in the
U.S. market, where a majority of its revenue is based. As an outcome, this shareholder proposal passed. Engagement example:

BlackRock did not provide any engagement examples.

BNY Mellon (Walter Scott & Partners Limited)

Voting example: BNY Mellon Long Term Global Equity Fund – Microsoft Corporation

In December 2025, Walter Scott voted for a shareholder proposal (against management) to report on risks of operating in countries with significant human rights concerns. Walter Scott informed the company of their voting intentions and rationale beforehand by email to the company.

Walter Scott believed this additional disclosure would be in the long-term best financial interest of shareholders. However, the proposal failed, with only 27% of participants voting 'for'.

Walter Scott noted that all significant votes are reviewed and approved by the Proxy Voting and Engagement Group. Any potential learnings from their significant votes are then taken into account for periodic reviews of their Proxy Voting Policy. This vote was deemed to be a significant vote as it was a vote against management.

Engagement example: Strategy level

During 2025, Walter Scott engaged with Copart, Inc., a multinational provider of online vehicle auction and remarketing services to automotive resellers, to encourage standardised disclosure of environmental data, as part of the Carbon Disclosure Project ("CDP") Non-Disclosure Campaign.

Walter Scott's engagement policy targets regular and constructive interactions with company management and believes this information will allow them to better assess the environmental risks and opportunities.

Walter Scott led the engagement with Copart about this topic and plans to follow-up in due course.

Fidelity International

Voting example: FutureWise Target 2025; FutureWise Retirement Aggregator Fund – Alphabet Inc.

In June 2025, BlackRock voted against a shareholder proposal relating to publication of human rights impact assessment of AI driven targeted advertising.

BlackRock voted this way as they believe that the company already provides sufficient disclosure and/or reporting regarding this issue, or is already enhancing its relevant disclosures. BlackRock did not support the resolution, following changes to the company's AI-related disclosures during the 2024-25 proxy year, including the publication of updated safety frameworks, as well as its annually published advertising safety report. As an outcome, this shareholder proposal failed.

Voting example: FutureWise Target 2030; FutureWise Target 2035 – Stellantis NV

In April 2025, BlackRock voted in against of a shareholder proposal relating to approval of remuneration report containing remuneration policy for management board members

BlackRock voted this way as they believe that the company's remuneration arrangements are poorly structured and there was poor use of remuneration committee discretion regarding the grant of a one-off award. Also, disclosure does not provide sufficient understanding of the company's remuneration policies and the link between performance-based pay and company performance. BlackRock voted to not support management's recommendation on relevant executive compensation-related items. As an outcome, this shareholder proposal passed.

Voting example: FutureWise Target 2040 – HCA Healthcare, Inc.

In April 2025, BlackRock voted in against of a shareholder proposal relating to amendment of patient safety and quality of care committee charter.

BlackRock voted this way as they believe that company already had policies in place to address the proponent's request or were overly prescriptive. The company's board committee was already empowered to review any matters that could impact patient safety, quality of care and patient safety metrics, including staffing levels. As an outcome, this shareholder proposal failed.

Voting example: FutureWise Target 2045 – The Cigna Group

In April 2025, BlackRock voted against a shareholder proposal to amend the right to call special meeting.

BlackRock voted this way as they believe that the one-year holding requirement to call a special meeting of shareholders is a reasonable safeguard against the ineffective use of corporate resources, as well as the risk that a special meeting may be called by shareholders who have amassed the required threshold of shares in a relatively short period of time to advance interests that may conflict with those of long-term shareholders. As an outcome, this shareholder proposal failed.

Voting example: FutureWise Target 2050; FutureWise Target 2055; FutureWise Target 2060; FutureWise Target 2065; FutureWise Target 2070 – Takeda Pharmaceutical Co., Ltd.

In June 2025, BlackRock voted against a shareholder proposal relating to approval of annual bonus, due to issues with compensation-related disclosure and governance.

BlackRock voted this way as they believe that there was a misalignment between pay and performance, alongside insufficient disclosure on the effectiveness of the remuneration policies in incentivizing long-term financial value creation. As an outcome, this shareholder proposal passed.

Engagement example:

BlackRock (Underlying fund manager for Fidelity International) did not provide any engagement examples.

HSBC

Voting example: Islamic Global Equity Fund – Meta Platforms, Inc.

In May 2025, HSBC voted for a resolution asking Meta Platforms, Inc. to disclose a climate transition plan resulting in new renewable energy capacity. HSBC voted for the resolution as they believed that the proposal would lead to the better management of climate-related risks and be in the interest of shareholders.

Despite HSBC voting for the resolution, this resolution did not pass. HSBC deemed the vote as significant as the vote was against management and the company had a significant weight in the portfolio.

Engagement example: Strategy level

In 2025, HSBC engaged with a leading European pharmaceutical on the issue of climate change, talent & opportunity.

The company has experienced significant success under a strong Chief Executive Officer (CEO), making their eventual replacement a concern. The CEO has received substantial compensation for past performance.

Additionally, the company's climate plan has not kept pace with its commercial success. Addressing Scope 3 emissions and maintaining competitive yet reasonable executive compensation can support the company's license to operate and enhance its sustainability profile.

During 2024, HSBC met with the Investor Relations and sustainability teams where they shared their perspectives on succession, pay, board practices, and concerns about the rise in Scope 3 emissions despite the company's emissions reduction target. HSBC praised the company's approach to health access in less wealthy countries and its commitment to living wages across its production facilities and supply chain.

The company has revealed clearer targets to engage its supply chain in supporting emissions reductions. HSBC have requested that this information be more clearly expressed in the company's reporting. As a next step, the company remains on HSBC's priority list, and will continue to monitor and encourage progress.

M&G Investments – Total Return Credit

Engagement example: Strategy level

In 2025, M&G engaged with Stellantis NV, an automotive manufacturing company, on matters concerning Climate Change, to encourage the company to publicly address an area of misalignment in its lobbying activities, specifically the difference between the European Automobile Manufactures' Association (ACEA) position (which Stellantis rejoined on 1 January 2025) and that of Stellantis on 2025 CO2 targets.

As part of a collective engagement with CA100+, M&G co-signed an investor letter addressed to investor relations of the company to make their expectations known.

In the letter M&G explain that, as investors, they recognise that the European automobile sector is facing an enormous industrial transformation driven by the climate transition, technology, and artificial intelligence. M&G also understand that this requires long-term planning for the transformation of supply chains, workforce training, and investment. M&G encouraged the company, in its upcoming disclosure, to consider:

- Releasing a public statement/policy position on the EU's 2025, 2030 and 2035 CO2 targets for cars and vans. This should include the company's' position on the timing of the CO2 regulation review, an explanation of any misalignments between its own positions and those of its industry associations, and what action the company intends to take where misalignments occur.
- Updating its climate reporting to include a list of policy dependencies that it requires to successfully deliver its net zero target and climate transition plan. This should include disclosure of its efforts to advocate for such measures, including through industry associations of which it is a member.

Nordea Asset Management

Voting example: Global Climate and Environment Fund – Trane Technologies Plc

In June 2025, Nordea voted against management on a proposal relating to approval of issuance of equity or equity-linked securities without pre-emptive rights. Nordea voted against the proposal as they believed that the proposed issuance without pre-emptive rights exceeds 10 percent of issued capital (i.e. 20 percent). Nordea did not support the proposal as it is not in line with their expectations on good corporate governance. As an outcome, this proposal passed.

Nordea deemed the vote as significant as matter was severely against their principles, and they felt a need to enact change in the company.

Engagement example: Strategy level

In 2025, Nordea engaged with East Japan Railway, major railway company in Japan, on matters concerning climate change.

Nordea's engagement with East Japan Railway is aligned with their broader focus on transportation companies with significant environmental impact potential. This meeting follows previous discussions with the company and centers on their decarbonization strategy and net-zero ambitions. Train services have lower carbon emission as compared to bus or aviation per passenger kilometer. However, decarbonization is pertinent given the company's reliance on fossil fuel energy sources. The company reaffirmed its commitment to achieving net-zero emissions by fiscal year 2051, with an interim target of reducing CO2 emissions by 50% by 2030 compared to 2013 levels. Nordea expressed concerns about their Science-Based Targets initiative (SBTi) progress. Nordea also encouraged the company to consider resetting their emissions reduction base year from FY2013 to a more recent year to ensure targets reflect current operational realities and measurement improvements.

However, several areas require continued monitoring and engagement. East Japan Railway acknowledged that renewable energy development alone will not meet their needs highlights the complexity of their decarbonization journey. Nordea will continue to engage with them to provide more concrete timelines for their renewable energy expansion, hydrogen transition, more detailed disclosure on decarbonization efforts.

RBC Global Asset Management

Voting example: Global Focus Equity Fund – Trane Technologies Plc

In June 2025, RBC voted against management on the election of Director Stephen Neal. RBC voted against the proposal as they oppose the incumbent chair of the nominating committee, where more than 1/3 of the board has a tenure greater than 15 years. RBC deemed the vote significant as it was one in which they voted against management.

Engagement example: ABB Limited

In 2025, RBC engaged with ABB, a global leader in electrification and automation technologies, on climate change and strategic sustainability matters. This engagement reflected RBC's focus on companies that play a critical role in enabling industrial decarbonisation and aligned with RBC's objective of understanding how sustainable business models drive long-term value creation. Discussions centred on ABB's sustainability governance, its approach to managing concentrated value chain emissions (with 97% of emissions arising from product use/Scope 3), and the real-world decarbonisation impact of its product portfolio.

The meeting, held in Q2 2025 with ABB's Head of Sustainability, provided insight into how the company integrates sustainability into its core strategy rather than treating it as a standalone function. ABB outlined its deliberately lean central sustainability team, designed to embed ESG responsibilities within each business unit and empower local teams to own and drive initiatives. The company emphasised the commercial rationale for sustainable solutions, highlighting offerings such as battery energy storage systems, high-efficiency electric motors and advanced drives that help customers reduce their environmental footprint and operate more efficiently.

Through this engagement, RBC gained a deeper understanding of how ABB addresses its predominantly Scope 3 emissions profile by focusing on product innovation that supports customers' decarbonisation journeys. While the discussion did not result in immediate policy or target changes, it strengthened conviction in ABB's strategic direction and sustainability-led value proposition. RBC will continue to engage with the company as part of their active ownership, monitoring the evolution of its sustainability solutions and assessing their real-world decarbonisation impact over time.

Threadneedle Property

Engagement example: Firm level

In 2025, Threadneedle engaged with Microsoft on matters concerning balancing AI innovation with responsible governance, healthcare transformation.

Threadneedle engagement focused on Microsoft's approach to healthcare AI innovation and governance. The company maintains strict controls over AI deployment, particularly in sensitive contexts, with mandatory impact assessments and enhanced scrutiny for sensitive use cases. In healthcare specifically, they are enhancing their cloud platform with specialized solutions, notably through the Dragon acquisition for ambient clinical documentation. Their differentiated approach combines broad cloud capabilities with industry-specific solutions, positioning them within Threadneedle's "AI in Healthcare: Workflow Efficiency" and "Clinical Decision Support" investment categories. The company remains committed to responsible AI deployment while addressing both clinical outcomes and sustainability goals.

The Dragon Copilot solution fits Threadneedle's near-term focus on workflow efficiency. The company's proactive governance frameworks and transparent handling of sensitive issues indicate effective management of both opportunities and risks in AI deployment. Their approach aligns with Threadneedle's investment framework's emphasis on solutions that integrate validated AI into existing healthcare workflows while ensuring regulatory compliance and measurable outcomes.