

# Volvo Group UK Executive Pension Scheme (“the Scheme”) – Implementation Statement for the period 1 April 2024 to 31 March 2025

## Introduction

The Trustee has prepared this Implementation Statement in accordance with the requirements of the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019 and subsequent amending legislation, and those of the Pensions Regulator’s General Code of Practice. It sets out how the Trustee has complied with the Scheme’s Stewardship Policy and Statement of Investment Principles during the period 1 April 2024 to 31 March 2025.

Overall, the Trustee is satisfied that:

- The Scheme’s investments have been managed in accordance with the Scheme’s Stewardship Policy during the period;
- The Scheme’s investments have been managed in accordance with the remainder of the Scheme’s Statement of Investment Principles; and
- The provisions of the Statement of Investment Principles were suitable for the Scheme’s members over the last Scheme Year.

## Statement of Investment Principles

The Statement of Investment Principles sets out the principles and practices the Trustee follows when governing the Scheme’s investments. It describes the rationale for selecting the investment strategy and explains the risks and expected returns of the funds used, as well as the Trustee’s approach to responsible investing (including climate change).

The Trustee reviewed and updated the Statement of Investment Principles in September 2024 to reflect the decision to move away from a fiduciary management arrangement into an investment consultancy model. The revised Statement of Investment Principles sets out the Trustee’s updated approach to investment oversight, including the appointment of individual managers and a more direct governance structure.

On 28 February 2025, all assets and liabilities of the Scheme were transferred on a sectionalised basis to the Volvo Group UK Pension Scheme to form the Executive Section of the Volvo Group UK Pension Scheme. Following the merger, the Scheme only retained a small allocation to cash needed to cover its remaining liabilities and expenses.

The Trustee has prepared this Implementation Statement on the basis of the Statement of Investment Principles in force prior to the merger, with reporting within this document in line with the Statement of Investment Principles applicable at the relevant time.

The Scheme’s Statement of Investment Principles can be consulted online at <https://schemes.vidett.com/wp-content/uploads/Volvo-Exec-SIP-September-2024-vf.pdf>

## Investments governance

The primary objective of the Scheme is to provide pension and lump sum benefits for members on their retirement and/or benefits on death, before or after retirement, for their dependants, on a defined benefits basis.

The Trustee has overall responsibility for how the Scheme’s investments are governed and managed, in accordance with the Scheme’s Trust Deed and Rules, as well as Trust Law, Pensions Law and Pension Regulations.

The Trustee has delegated all day-to-day investment decisions to its respective investment managers who are authorised and regulated by the Financial Conduct Authority (FCA).

Following its appointment in November 2023, the Trustee set objectives for the Scheme's investment adviser designed to align with the Trustee's own objectives and investment strategy as set out in the Statement of Investment Principles. The suitability of these objectives is reviewed on an annual basis and was last reviewed by the Trustee in December 2024.

The Trustee carried out an evidence-based review of the investment adviser's performance against these objectives in December 2024. This involved assessing the adviser against the set of objectives agreed. The Trustee is satisfied that the objectives have been achieved for the year.

The investment risks relating to the Scheme are described in the Statement of Investment Principles. Further details regarding the investment strategy, including the expected return on the assets, are set out in a separate Investment Policy Implementation Document maintained by the Trustee.

The Trustee's views on the expected levels of investment risk and return inform decisions on the strategic asset allocation (i.e., what type of assets and areas of the world the Scheme invests in over the longer term), and the style of management adopted by the Scheme.

The Trustee has conflicts of interest policies in place covering all service providers, including the investment adviser and current investment managers. The Trustee formally asks service providers to confirm any conflicts of interest when the Trustee meets with them. No actual or potential conflicts were reported during the period.

### **Stewardship Policy**

The Trustee's Stewardship Policy sets out how the Trustee will behave as an active owner of the Scheme's assets. It includes the Trustee's approach to:

- The exercise of voting rights attached to assets; and
- Undertaking engagement activity, including how the Trustee monitors and engages with its investment managers and other stakeholders.

The Scheme's Stewardship Policy can be found within the Scheme's Statement of Investment Principles at the link provided above.

The Scheme's Stewardship Policy is reviewed in line with the Scheme's Statement of Investment Principles, which was last reviewed in September 2024.

The Trustee has delegated voting and engagement activity in respect of the underlying assets to the Scheme's investment managers. The Trustee believes it is important that its investment managers take an active role in the supervision of the companies in which they invest, both by voting at shareholder meetings (where relevant) and engaging with management on issues which affect a company's financial performance.

In December 2024, the Trustee met with all of the Scheme's managers and received updates from them on investment performance, outlook and integration of environmental, social and governance factors (including stewardship activities) into the respective investment processes. The Trustee also receives regular reporting from its investment adviser which covers any material changes to the managers' policies and processes when relevant.

The Trustee monitors its compliance with the Stewardship Policy on a regular basis and is satisfied that it has complied with the Scheme's Stewardship Policy over the last Scheme Year.

### Voting activity

During the period 1 April 2024 to 31 March 2025, the Scheme did not invest in any listed equity mandates and therefore had no material exposure to assets which carry any voting rights. As a result, the Trustee's monitoring activity focused on the manager's wider engagement with investee companies over the reporting period.

### Engagement activity

The Trustee periodically reviews its managers' engagement activity. The following table summarises the managers' engagement activity for the 12-month period ending 31 March 2025<sup>1</sup>.

Fund manager	Number of engagements	Key topics engaged on
Insight - High Grade ABS Fund	939	Environmental (399), Social (172), Governance (164), Strategy, Financial and Reporting (1,896)
Insight - Maturing Buy & Maintain Funds	355	Environmental (249), Social (128), Governance (78), Strategy, Financial and Reporting (900), Other (54)
Barings - Global High Yield Credit Strategies Fund	291	Environmental (67), Social (52), Governance (12), Strategy, Financial and Reporting (160)

Key topics may not sum to the total number of engagements as some engagements span multiple topics.

### Policy review

The Trustee has committed to reviewing investment managers' Responsible Investment policies on an annual basis. A review was carried out in September 2024. At the time of the review, the Trustee was satisfied that the responsible investment policies of the Scheme's managers were suitable for the Scheme.

Prepared by:

Trustee of the Volvo Group UK Executive Pension Scheme

September 2025

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<sup>1</sup> Given the nature of the assets retained, no further engagement reporting is applicable beyond 31 March 2025, following the transfer of all Scheme assets and liabilities into the Executive Section of the Volvo Group UK Pension Scheme on 28 February 2025.