

Britvic Pension Plan - DC Section

Annual Implementation Statement – for the year ending 31 March 2025

1. Introduction

This statement is the annual Implementation Statement (“the statement”) prepared by the Trustee of the Britvic Pension Plan (the “Plan”) covering the Plan year from 1 April 2024 to 31 March 2025 (“the Plan year”).

The purpose of this statement is to:

- set out the extent to which, in the opinion of the Trustee, the Plan’s Statement of Investment Principles (“SIP”) has been followed during the year,
- detail any reviews of the SIP the Trustee has undertaken, and any changes made to the SIP over the year as a result of the review,
- describe the voting behaviour by, or on behalf of, the Trustee over the year.

The operation of the DC Section of the Britvic Pension Plan has been delegated by the Trustee through a “bundled” policy of insurance issued by Scottish Equitable PLC, trading as Aegon. This policy provides for administration, investment and communications. AVCs are also held through similar policies issued by Prudential and Zurich.

The DC Section assets are invested in a range of pooled investment funds through the Aegon policy and whose underlying investment managers are Legal & General Investment Management (“LGIM”), BlackRock and HSBC. This significantly simplifies the operational aspects of the Plan for the Trustee but means that the Trustee has limited ability to engage directly with, or influence the voting decisions of, the investment managers. Similarly, as the Trustee does not invest directly with the investment managers, they do not have visibility of the Trustee’s specific holdings as the DC Section’s investments are made via Aegon’s pooled investment funds.

2. Review of, and changes to the SIP

The SIP was last updated in June 2025 (after the Plan year end) and covers the requirements on illiquid investments.

The SIP states that the Trustee will review the SIP at least once every three years and without delay after any significant change in investment policy. Any change to this Statement will only be made after having obtained and considered the written advice of someone who the Trustee reasonably believes to be qualified by their ability in and practical experience of financial matters and to have the appropriate knowledge and experience of the management of pension scheme investments.

3. Adherence to the SIP

The Trustee considers that the DC Section of the SIP has been followed during the Plan year. This Statement provides details of how this has been achieved and covers those parts of the SIP which set out the Trustee's policies.

Policy area	Reference in the SIP dated 24 March 2022	Adherence to the SIP
Strategic management of the assets	SIP 3.0 - 3.5	During the Plan year, the Trustee managed the Plan assets by continuing to offer members a range of lifestyle investment options that support the ways in which members typically draw their benefits at retirement namely lump sum, annuity, and income drawdown. The Trustee offered a range of self-select investment funds recognising that some members wish to self-select to meet specific investment needs and objectives
Default investment option – the Drawdown Lifestyle	SIP 3.5	As part of the review of the default option in 2024, the Trustee considered both wider industry developments and member demographics. The Trustee also reviewed alternative portfolios for comparative purposes. It was agreed to retain a Drawdown Lifestyle as the default option in line with the SIP as this was considered suitable for the majority of members. The composition of the default option was changed from 17 March 2025, with the Britvic Equity Fund replacing the Britvic Balanced Fund as the growth component. The Drawdown Lifestyle continues to allocate 25% of members' accounts to cash at retirement in line with the policy which remains broadly consistent with other pension arrangements. The Trustee uses mainly passive funds as the constituent funds underlying the default option and only uses actively managed funds where there are no passive alternatives. The change to the investment funds implemented on 17 March 2025, following the 2024 review, remained consistent with this approach.
Responsible investment and corporate governance	SIP 4.0 – 4.5	Following the Trustee's assessment of responsible investment and its impact on investment outcomes, the Trustee continues to take account of ESG factors within the default investment option and lifestyle options. The Britvic Equity fund uses a specialist ESG fund - the LGIM MSCI ACWI Adaptive Capped ESG Index Fund. It was noted that LGIM, as the manager of the Equity fund, operated a number of ESG based exclusions and intends to continue integrating ESG factors into the fund.

Investment manager appointments	SIP 5.1	The SIP notes that the DC Section only invests in pooled investment funds and so the Trustee has no direct influence over the investment managers or their voting policies. However, through the provision of ongoing advice, the Trustee continued to ensure that the investment objectives and guidelines of each investment fund were consistent with their own policies and objectives.
Monitoring of DC investment options/managers	SIP 5.2	The Trustee meets quarterly to conduct its business, which includes monitoring the DC Section's investment strategy and performance, including the quarterly reports received from Aegon. The DC investment adviser is instructed to update the Trustee in between these meetings if a particular issue arose with Aegon or one of the funds made available within the DC Section. The Trustee's advisers prepare a quarterly update, including a summary of the membership, DC assets, fund performance against their benchmark, fund updates (including risk and volatility monitoring), market updates. These are reviewed at each Trustee meeting. The Trustee monitors the Prudential and Zurich With-Profits Funds used for Additional Voluntary Contributions on an annual basis. The Trustee receives a monitoring report which considers the financial strength of the funds, asset allocation, performance assessment and pay out analysis.
Portfolio turnover costs	SIP 5.3	The Trustee completed a value for members assessment in May 2025 that explicitly considered and monitors transaction costs which can be considered a proxy for portfolio turnover costs. These are set out in the Chair's statement.
Manager turnover	SIP 5.4	The Trustee is a long term investor and is not looking to change the investment arrangements on a frequent basis, though changes may arise following a review of the fund range and default option.

Policy on investing in illiquid assets

The Plan currently accesses illiquid assets indirectly, through the LGIM Diversified Fund, which makes up 100% of the Britvic Diversified Fund and 50% of the Britvic Balanced Fund. Any investments in illiquid assets in this pooled fund are at the discretion of the investment manager, with decisions taken in the context of the fund's overall risk and return objectives, and currently the investments include property and private market credit investments. There are no plans to invest directly in illiquid assets.

Investment manager approach to sustainable investment

The investment managers for the Aegon funds selected by the Trustee are LGIM, BlackRock (Britvic Cash fund only since 17 March 2025) and HSBC. The fund range is set out in the Chair's statement.

As the DC Section of the Plan is delivered via a bundled policy with Aegon, and the investment funds are predominantly passively managed, the Trustee has no direct interaction with the underlying investment managers.

The Trustee has delegated responsibility for the selection, retention and realisation of investments to the underlying investment managers. The Trustee recognises that long-term sustainability issues, including climate change, have an impact on investment risk and outcomes.

A summary of engagement activity including corporate engagement and voting is provided for each investment manager and set out in Appendix 1.

Appendix 1 – DC section – Voting and engagement

The Trustee has not set any specific guidelines around manager voting.

The Trustee invests in pooled investment funds, as set out in the SIP. The Trustee's policy is to delegate the day-to-day stewardship and ESG integration and stewardship activities (including voting and engagement) to the investment managers.

The Plan's investment funds cover a range of asset classes; however, this appendix focuses on the equity investments which have voting rights attached. The fund managers have their own voting policies which determine their approach to voting, and the principles they follow when voting on investors' behalf. The providers also use proxy voting advisers which aid in their decision-making when voting and details are summarised below:

LGIM proxy voting decision process:

LGIM's Investment Stewardship team uses ISS's 'ProxyExchange' electronic voting platform to electronically vote clients' shares. All voting decisions are made by LGIM and no part of the strategic decisions are outsourced. LGIM's use of ISS recommendations is purely to augment its own research and proprietary ESG assessment tools. The Investment Stewardship team also uses the research reports of Institutional Voting Information Services (IVIS) to supplement the research reports that LGIM receives from ISS for UK companies when making specific voting decisions.

HSBC proxy voting decision process:

HSBC Asset Management (HSBC AM) appoints Institutional Shareholder Services (ISS) as its proxy voting agent. HSBC AM maintains a bespoke 'voting policy' and ISS votes in accordance with that policy (or as otherwise directed) at the annual general meetings of companies held in HSBC AM's portfolios. ISS retains a record of those votes, which HSBC AM uses to continually review and enhance its voting policy.

Prudential proxy voting decision process:

Fund management has been delegated to a number of fund managers and carried out by those fund managers who also use proxy voting services.

Summary of votes by managers

A summary of the votes made on behalf of the Trustees over the year to 31 March 2025 is provided in the table below:

	LGIM MSCI ACWI Adaptive Capped ESG Index Fund	LGIM Diversified Fund	LGIM Ethical Global Equity Index	HSBC Islamic Global Equity Index	Prudential With-profits
No. of meetings at which the manager was eligible to vote:	3,064	10,796	1,194	108	4,291
No. of resolutions on which manager was eligible to vote:	35,560	107,020	16,792	1,720	51,817
Percentage of eligible votes cast:	100%	100%	100%	97%	99%
Percentage of votes with management:	78%	77%	82%	78%	93%
Percentage of votes against management:	20%	22%	18%	21%	6.8%
Percentage of votes abstained from:	2%	1%	<1%	<1%	1%
In what percentage of meetings, for which you did vote, did you vote at least once against management	68%	69%	74%	79%	35%
What percentage of resolutions, on which you did vote, did you vote contrary to the recommendation of your proxy adviser?	14%	14%	14%	1%	1%

Source: LGIM, HSBC and Prudential

Significant votes

The table below demonstrates a range of significant votes, as determined by the fund managers, cast on behalf of the DC section investments of the Plan over the year to 31 March 2025.

Fund	Significant votes
LGIM MSCI ACWI Adaptive Capped ESG Index Fund (Britvic Equity Fund) (Component of the Britvic Balanced Fund)	Company name: Broadcom Inc. Date of vote: 22/04/2024 Resolution: Elect Director Henry Samueli How the manager voted: Against Rationale: Climate Impact Pledge: A vote against is applied as the company is deemed to not meet minimum standards with regard to climate risk management. Outcome of the vote: Pass
LGIM Diversified (Britvic Diversified Fund) (Component of the Britvic Balanced Fund)	Company name: Microsoft Corporation Date of vote: 10/12/2024 Resolution: Report on AI Data Sourcing Accountability How the manager voted: For Rationale: Shareholder Resolution - Governance: A vote FOR this resolution is warranted as the company is facing increased legal and reputational risks related to copyright infringement associated with its data sourcing practices. While the company has strong disclosures on its approach to responsible AI and related risks, shareholders would benefit from greater attention to risks related to how the company uses third-party information to train its large language models. Outcome of the vote: Fail
LGIM Ethical Global Equity Index Fund (Britvic Ethical Fund)	Company name: Unilever Plc Date of vote: 01/05/2024 Resolution: Approve Climate Transition Action Plan How the manager voted: For Rationale: Climate change: A vote FOR the Climate Transition Action Plan is applied as we understand it to meet LGIM's minimum expectations. This includes the disclosure of scope 1, 2 and material scope 3 GHG emissions and short, medium

	and long-term GHG emissions reduction targets consistent with a 1.5°C Paris goal. Despite the SBTi recently removing their approval of the company's long-term scope 3 target, we note that the company has recently submitted near term 1.5 degree aligned scope 3 targets to the SBTi for validation and therefore at this stage believe the company's ambition level to be adequate. We therefore remain supportive of the net zero trajectory of the company at this stage. Outcome of the vote: Pass
HSBC Islamic Global Equity Index (Britvic Shariah Fund)	Company name: Tesla, Inc. Date of vote: 13/06/2024 Resolution: Commit to a Moratorium on Sourcing Minerals from Deep Sea Mining How the manager voted: For Rationale: We believe that the proposal would contribute to the better management of nature-related risk. Outcome of the vote: Fail
Prudential With Profits fund	Company name: China Resources Beer (Holdings) Company Limited Date of vote: 20/05/2024 Resolution: Elect Houang Tai Ninh as Director How the manager voted: Against Rationale: Concern over low level of gender diversity. Outcome of the vote: Pass