SmithKline Beecham Senior Executive Pension Plan
IMPLEMENTATION STATEMENT
Year ended 31 DECEMBER 2023

Introduction to the Implementation Statement

This Implementation Statement has been produced in accordance with The Pension Protection Fund (Pensionable Service) and Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018 and the guidance published by the Pensions Regulator.

To prepare this Implementation Statement the Trustee has reproduced a copy of the latest Statement of Investment Principles ('SIP') covering the DB AVCs of the Plan, and included accompanying commentary to set out how, and the extent to which, the SIP has been followed during the year to 31 December 2023.

The detail of the Implementation Statement is included in the highlighted boxes throughout the document, following the relevant SIP sections.

The Trustee can confirm that all policies in the SIP have been followed in the Plan Year.

Assessment of how the policies in the SIP have been followed for the year to 31 December 2023

The information provided in the sections that follow, highlights the work undertaken by the Trustee during the year, and longer term where relevant, and sets out how this work followed the Trustee's policies.

The Trustee is responsible for the investment of the Plan assets. The Trustee takes some decisions itself and delegates others (either directly or indirectly) to one of the following:

- **The Joint DC Committee of the GSK Schemes ("JDCC")**
  The JDCC is a sub-committee of the Trustee Board. The JDCC members include Trustee Directors from the Plan and discussions are referred back to the main Trustee Board for discussion and approval.
- **The Joint Audit, Risk and Operations Committee of the GSK Schemes ("JAROC")**
  This group oversees the ongoing operation of and risks associated with insurance solutions in use.
- **External parties such as Investment Advisers or Asset Managers**
  This facilitates professional, full-time management and oversight of the Plan's investments.

Review of the SIP

Defined Benefits

During the year, the Trustee reviewed the Plan's SIP, taking formal advice from its Investment Advisor, Cardano Risk Management Limited. A revised SIP was approved in March 2023 with the following changes being effected:

- Updates to wording and replacement of asset allocation with broader terminology of investment strategy

Defined Benefit AVCs

During the year, the Trustee reviewed the Scheme's SIP, taking formal advice from its Investment Consultant Mercer Limited ("Mercer"). A revised SIP was approved in October 2023 to reflect changes to the investment strategy and fund names.

Defined Benefits commentary

Statement of Investment Principles for the Defined Benefit Section – March 2023

This Statement of Investment Principles ("**SIP**") covers the Defined Benefit ("**DB**") assets of the Plan. It is set out in three parts:

1) Governance Arrangements
2) Objectives, Strategy and Implementation of the DB Section
3) The Trustee's Investment Policies

The Plan's investment arrangements with respect to the DB Section are set out in this SIP. This SIP has been prepared after obtaining written professional advice from Cardano Risk Management Limited (the "**Investment Adviser**") which is regulated by the Financial Conduct Authority ("**FCA**"). The Trustee believes that the Investment Adviser meets the requirements of Section 35(5) of the Pensions Act 1995. The Trustee has also consulted with GSK (the "**Principal Employer**") in forming this document.

For convenience, the Plan's SIP has been split into two documents. This document covers the DB Section and there is a separate document covering the DB Additional Voluntary Contributions ("**AVCs**"), the document titled the '*Statement of Investment Principles for the Defined Benefit AVCs – October 2023'*.

The Plan is governed by its Trust Deed and Rules which sets out all of the benefits in detail and specifies the Trustee's investment powers. The investment powers do not conflict with the SIP.

Securing compliance with the legal requirements about choosing investments

Over the Plan year to 31 December 2023 no major changes were made to the investment strategy

1. Governance Arrangements

The Trustee is responsible for the investment of the Plan assets. The Trustee takes some decisions itself and delegates others (either directly or indirectly) to the Joint Audit, Risk & Operations Committee ("**JAROC**") or to external parties such as investment advisers or asset managers.

When deciding which decisions to take itself and which to delegate, the Trustee has taken into account whether it has the appropriate training and expert advice in order to make an informed decision, as well as the Trustee's ability to effectively execute the decision. The Trustee has established the following decision-making structure.

Trustee

- Set structures and processes for carrying out its role.
- Determine (with assistance as required) the investment strategy, hedging strategy and insurance solutions.
- Select the AVC investment options.
- Select and monitor investment advisers.
- Maintain an Investment and Hedging Strategy ("**IHS**") document.
- Set structures for implementing the IHS and make day to day decisions relevant to the operation of the IHS

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- Set structures for implementing the IHS and make day to day decisions relevant to the operation of the IHS.
- Annually update the IHS to capture any changes that have occurred in the preceding 12 months.
- Require the asset managers to operate within the terms of this statement so far as practical.
- Consult the Joint Investment Committee (“**JIC**”) for any investment input desired.

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JAROC

- Review ongoing operation of and risks associated with insurance solutions in use.

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Investment Advisers

- Advise on all aspects of the investment of the Plan assets, ESG (including climate change) including implementation.
- Advise on this statement.
- Provide required training.
- Advise the Trustee on suitability of the benchmarks used.

</td><td>

Asset Managers

- Operate within the terms of this statement and their written contracts.
- Select the individual investments within their portfolios (e.g. individual stocks, bonds, derivatives, repos, etc as applicable) with regard to their suitability, including consideration of the impact on portfolio diversification, ESG (including climate change), and stewardship requirements.

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We confirm that the approach outlined above in Section 1. Governance was used throughout the year to 31 December 2023.

2. Objectives, Strategy and Implementation of the DB Section

2.1 - Investment Objective

The Trustee aims to invest the assets of the Plan prudently to ensure that the benefits promised to members are provided. The investment strategy that it has selected consists primarily of an insurance solution (a “**Buy-in Policy**”), designed to meet the benefits of the majority of members as they fall due.

2.2 - Strategy

The investment strategy was determined with regard to the liability profile and funding position of the Plan. The Trustee considered written advice from its investment advisers when choosing the Plan’s investment strategy. The Trustee monitors the investment strategy on an ongoing basis.

2.3 - Risk Measurement and Management

The Trustee recognises that the key risk to the Plan is that it has insufficient assets to make provisions for 100% of its liabilities (“funding risk”). The Trustee has identified a number of risks which have the potential to cause deterioration in the Plan’s funding level and therefore contribute to funding risk. These risks are discussed in this section.

2.4 - Risks Managed by the Trustee

The risks identified by the Trustee are as follows:

- The risk of a significant difference in the sensitivity of asset and liability values to changes in financial and demographic factors ("mismatching risk"). The Trustee and its advisers considered this mismatching risk when agreeing the investment strategy.
- The possibility of failure of the Plan's sponsoring employer ("covenant risk"). The Trustee and its advisers considered this risk when agreeing investment strategy and consulted with the sponsoring employer as to the suitability of the investment strategy.
- Investment related risks (such as non-diversification risk, asset misallocation risk, manager risk, custody risk, stocklending risk, and cash investment risk as well as the risk attaching to a failure to adequately monitor environmental, social and governance ("**ESG**") considerations (including climate-related risks and opportunities) or other financially material considerations, which may have an adverse effect on the performance of the assets over the relevant lifespan of the Plan).
- Hedging related risks (such as counterparty risk, roll risk, hedge ineffectiveness risk, and collateral shortfall risk), and liquidity risk.

The Trustee considers these risks to be well managed, by virtue of the Buy-in Policy which requires the insurer to meet the majority of benefit payments as they fall due.

2.5 - Management of Operational Risk

A further risk that the Trustee has identified is the risk of fraud, poor advice or acts of negligence ("operational risk"). The Trustee have sought to minimise such risk by ensuring that all advisers and third-party service providers are suitably qualified and experienced and that suitable liability and compensation clauses are included in all contracts for professional services received.

In addition, the JAROC have responsibility for reviewing the ongoing operation of and risks associated with the Buy-in Policy, including but not limited to the Insurer's ongoing credit quality and the timeliness and accuracy of payments.

2.6 - Regular Monitoring of Risks

The Trustee manages risks using both qualitative and quantitative techniques.

Due to the complex and interrelated nature of the risks that the Trustee manages directly, these risks are considered in a qualitative rather than quantitative manner as part of each formal investment strategy review (normally triennially).

The Trustee may also review the risks directly managed by it quantitatively. For example, the Trustee regularly reviews the progress of the Plan's funding level over time as part of its ongoing management of mismatching risk. In addition, the Trustee monitors:

- Performance versus the Plan's investment objective.
- Performance of individual asset managers versus their respective targets.
- Any significant issues with the asset managers that may impact their ability to meet their performance targets.

2.7 - Implementation

The Trustee invests DB Section assets directly, primarily via a Buy-in Policy.

We confirm that the approach outlined above in Section 2. Objectives, Strategy and Implementation was used throughout the year to 31 December 2023. In particular;

1) **Kind of investments held, their expected return and the balance between them**
Over the course of the year, the assets continued to be invested primarily via a Buy-in policy and no changes were made to the approach.

2) **Risks and how they are measured and managed**
The Trustee considers both quantitative and qualitative measures for risks when deciding investment policies and the choice of Asset Managers, funds and strategies.

The Plan maintains a risk register of the key risks, including the investment risks. This rates the impact and likelihood of the risks and summarises existing mitigations and additional actions.

A number of risks related to the ongoing operation of the Buy-in policy, such as the Insurer's credit quality and payment risk are delegated to the JAROC to oversee and are monitored on a quarterly basis.

3. Investment Policies

3.1 - General Investment Policy also covering ESG (including climate change) and Stewardship

The Trustee of the Plan will, after having taken investment advice, decide an overall objective for the Plan. The IHS is then developed which considers:

- The underlying schemes' objective for the investment strategy.
- A full range of asset classes, including alternative asset classes such as private equity.
- The suitability of each asset class in the investment strategy.
- The risks and rewards of a range of different asset allocation strategies.
- The suitability of the possible styles of investment management and manager diversification.
- The need for appropriate diversification both across asset classes and within asset classes.
- The viability of including risk mitigation strategies, for example by seeking to protect against equity falls using floors or other hedging mechanisms.
- ESG (including climate-related) risks and opportunities in the investment and funding strategies.

Having considered the above and taken advice from the investment advisers, the Trustee will consider the investment strategy for the Plan. It has been agreed that all of the Plan's assets will be liability matching in nature, with the majority being held in the form of a Buy-in Policy.

Kind of investments held

The majority of the Plan's assets remain in the form of a Buy-in policy with no changes made in the reporting period.

Expected return on investments

Given the Buy-in policy, monitoring centres around the Insurer's credit quality and operational performance. This takes place on a quarterly basis.

Realisation of Investments

The Trustee takes advice from the Investment Adviser to ensure the overall portfolio liquidity is sufficient and whenever divestments are required.

The Trustee expect (where used) the asset managers to manage the assets delegated to them under the terms of their respective contracts and to give effect to the principles in this statement so far as is reasonably practical. In addition, asset managers pay commissions to third-parties on many trades they undertake in the management of the assets.

The Trustee has a long-term time horizon for its investments and therefore acknowledges the importance of being an engaged and responsible long-term investor in the assets and markets in which it invests. The Trustee considers sustainable investment to be the integration of ESG factors (including climate-related risks and opportunities) into investment decisions, where financial risk and/or return is or could be materially affected ("**Sustainable Investment**").

However, as the majority of the Plan's assets are in the form of a Buy-in Policy, the Trustee recognises that it is not possible to specify investment restrictions on these assets.

To the extent asset managers are selected, retained or realised for the residual liability matching assets, the Trustee expects their managers to take into account Sustainable Investment considerations (including but not limited to climate change) when making investment decisions.

The Trustee keeps up to date on developments in Sustainable Investment through periodic training and discussions.

Financially material considerations over the appropriate time horizon

As the Plan's assets are now largely in the form of a Buy-in policy, it is not possible for the Trustee to factor in Sustainable Investment considerations to the management of these assets.

One asset manager is currently retained for the small residual investment in liability matching assets, where the Trustee acknowledge there are fewer opportunities to display strong ESG credentials. Nonetheless, the Investment Adviser provides both general and ESG specific ratings for the asset manager which are reviewed quarterly.

3.1.1 - Stewardship

Whilst the Trustee does not wish to interfere with the day to day investment decisions of its asset managers, where managers have voting rights and can be impactful the Trustee evaluates each asset manager's approach and voting policies on an annual basis and the Trustee expects its asset managers to comply with the principles outlined in the Principles for Responsible Investing and the UK Stewardship Code. The Trustee's Investment Adviser has regular dialogue on this topic with asset managers and reports this to the JIC no less than annually.

The Trustee supports the principle of good corporate governance and shareholder activism and, for relevant mandates, requires its asset managers to have an explicit strategy, outlining the circumstances in which they will engage with a company (or issuer of debt, or stakeholder, if applicable) on relevant matters (including performance, strategy, capital structure, management of actual or potential conflicts of interests, risks, social and environmental impact and corporate governance matters) and how they will measure the effectiveness of this strategy. Where an explicit policy is not available, the Trustee will require an outline of the approach taken, including examples.

On behalf of the Trustee, the JIC reviews regularly the voting strategy of its asset managers and has identified a series of specific stewardship priorities that it considers most significant to help oversee voting and engagement activity.

In the event the voting and engagement strategy is deemed insufficient, the JIC will either request further engagement and updates from the Investment Adviser or engage directly with the asset manager. If this is not successful, the JIC could ultimately opt to remove the asset manager

The exercise of rights (including voting rights) attaching to the investments

There were no equities held in the portfolio during the reporting period so there were no voting rights to exercise.

Undertaking Engagement activities (including the methods by which, and the circumstances under which, trustees would monitor and engage with relevant persons about relevant matters)

Given the nature of the Plan's assets there was no voting activity to review during the reporting period.

As the majority of the Plan's assets are in the form of a Buy-in Policy, the Trustee does not take the views of the members and beneficiaries, including (but not limited to) their views in relation to Sustainable Investment into account when setting the Defined Benefit investment strategy.

The extent to which non-financial matters are taken into account

There were no non-financial matters considered during the reporting period.

3.1.2 - Arrangements with Asset Managers: Policy

The Trustee believes that an understanding of, and engagement with, asset managers' arrangements is required to ensure they are aligned with Trustee's policy, including its Sustainable Investment policy. In accordance with latest regulation, it is the Trustee's policy to ensure that the following are understood and monitored:

- How asset manager arrangements incentivise asset managers to align their strategy and decisions with the Trustee's policies
- How asset manager arrangements incentivise asset managers to make decisions based on assessments about medium to long-term financial and non-financial performance of an issuer of debt or equity and to engage with issuers of debt or equity in order to improve their performance in the medium to long-term
- How the method (and time horizon) of the evaluation of asset managers' performance and their remuneration are in line with the Trustee's policies
- Portfolio turnover costs incurred by the asset managers, in the context of the asset manager's targeted portfolio turnover (defined as the frequency within which the assets are expected to be bought or sold)
- Duration of the arrangement with the asset manager

3.1.2 - *Arrangements with Asset Managers: Implementation*

As the majority of the Plan's assets are in the form of a Buy-in Policy, the Trustee recognises that it is not possible to engage on the above matters in respect of that policy.

However, to the extent asset managers are selected, retained or realised for the residual liability matching assets, the Trustee considers their Investment Adviser's assessment on the alignment of the asset manager with the Trustee's policies set out above and by reference to the matters set out at Regulation 2(3)(d) of The Occupational Pension Schemes (Investment) Regulations 2005, including those related to ESG and Stewardship.

How the arrangements incentivise Asset Managers to:

- **Align with the Trustee's policies**
- **Make decisions based on the medium to long term performance of asset issuers and engage with them to improve performance**

Given the Buy-in, there were no changes or explicit engagements required in relation to Asset Managers and the approach remains well aligned with the Trustee's policies.

How the method (and time horizon) of the evaluation of performance and the remuneration for services are in line with Trustee's policies

Where managers are not meeting performance objectives, the Trustee will monitor the manager closely in conjunction with the Plan's Investment Adviser. In some instances, the Investment Adviser may share certain criteria with the manager, which they will need to meet in order to avoid having their rating downgraded (or have their rating re-upgraded).

How the Trustee monitors portfolio turnover costs

The Plan's Investment Adviser monitors manager portfolio turnover on the Trustee's behalf as part of its ongoing manager monitoring.

There were no instances of excessive portfolio turnover for the period covered by this statement.

Duration of Asset Manager arrangements

The Buy-in is purposely designed as an ongoing contractual relationship to meet the benefits of members as they fall due. No changes were made to the Asset Manager roster during the reporting period.

3.2 - Additional Voluntary Contributions ("**AVCs**")

The Trustee has made available various investment vehicles for the investment of AVCs. The details of the policies surrounding these arrangements are set out in the Plan's '*Statement of Investment Principles for the Defined Benefit AVCs - October 2023*'.

3.3 - Direct Investments

The Pensions Act 1995 distinguishes between investments where the management is delegated to an asset manager under a written contract and those where a product is purchased directly, e.g. the purchase of an insurance policy or units in a pooled vehicle. The latter are known as direct investments.

The Trustee approaches Sustainable Investment and ESG considerations where applicable in direct investments consistently with their general policies outlined above.

The Trustee's policy is to review its direct investments and to obtain written advice about them at regular intervals. These include the vehicles available for members' AVCs.

When deciding whether or not to make any new direct investments the Trustee will obtain written advice and consider whether future decisions about those investments should be delegated to the asset manager(s).

The written advice will consider the issues set out in the Occupational Pension Schemes (Investment) Regulations 2005 (as amended by subsequent legislation) and the principles contained in this statement. The regulations require all investments to be considered by the Trustee (or, to the extent delegated, by the asset managers) against the following criteria:

- The best interests of the members and beneficiaries
- Security
- Quality
- Liquidity
- Profitability
- Nature and duration of liabilities
- Tradability on regulated markets
- Diversification
- Use of derivatives

The policy for the Plan's AVC assets which are classified as direct investments are set out in the Plan's '*Statement of Investment Principles for the Defined Benefit AVCs – October 2023*'.

We confirm that the approach outlined in 3. Investment Policies was used throughout the year to 31 December 2023.

4. Supplementary information to the SIP

There is further information contained in the document titled '*Supplementary information to the Statement of Investment Principles ("SIP") for the DB Section of the Plan – March 2023'* on the following:

- Fee structures for Managers and Advisers. In addition, details of the policies governing AVC arrangements are set out in the Statement of Investment Principles for the DB AVCs.

5. Compliance with this statement

The Trustee will review this SIP at least every 3 years and as soon as practicable following a significant change in investment strategy. The Trustee will take investment advice and consult with the Principal Employer over any changes to the SIP.

As noted earlier in this Statement, the SIP was reviewed in 2023 to ensure it remained current with the latest legislation.

DB AVC Section commentary

Statement of Investment Principles for the DB AVCs –October 2023

This Statement of Investment Principles ("**SIP**") covers the AVC holdings of the Defined Benefit ("**DB**") Section of the Plan.

It is set out in three parts:

1) Governance Arrangements
2) Objectives and Implementation of the DB AVC Holdings of the Plan
3) The Trustee's Investment Policies

The Plan's investment arrangements with respect to the DB AVC holdings are set out in this SIP. This SIP has been prepared after obtaining written professional advice from Mercer Limited (the "**Investment Adviser**") which is regulated by the Financial Conduct Authority ("**FCA**"). The Trustee believes that the Investment Adviser meets the requirements of Section 35(5) of the Pensions Act 1995. The Trustee has also consulted with GSK (the "**Principal Employer**") in forming this document.

For convenience, the Plan's SIP has been split into two documents. This document covers the DB AVC arrangements and there is a separate document covering the DB Section titled the *'Statement of Investment Principles for the Defined Benefit Section – March 2023'.*

The Plan is governed by its Trust Deed and Rules, which sets out all of the benefits in detail and specifies the Trustee's investment powers. The investment powers do not conflict with the SIP. This SIP is also designed to fulfil the key objectives of the DC Code of Practice.

The Trustee believes that the Plan's investment policies and their implementation are in keeping with best practices, including the principles underlying the Pensions Regulator's DC Code of Practice No 13.

Securing compliance with the legal requirements about choosing investments

Over the Scheme Year to 31 December 2023 there were updates to the investment strategy, which resulted in the following changes:

1. The glidepath of the GSK Lifecycle Options (excluding the legacy pre-2014 strategy) was changed. Invested members more than 15 years to retirement are now fully invested in the GSK Global Equity Fund, with a gradual transition from the GSK Global Equity Fund to the GSK Lifecycle Fund between 15 to 10 years to retirement.
2. The 'at-retirement' allocation of the GSK Lifecycle Drawdown Option (the main investment strategy) was also changed, with a reduction in the GSK Cash Fund allocation from 25% to 10%, and a commensurate increase in the GSK Retirement Income Fund.
3. The name of the GSK Lifecycle Pension Option was changed to the 'GSK Lifecycle Annuity Option'.
4. The name of the GSK Pre-Retirement Inflation Linked Fund was changed to the 'GSK Targeting Annuity Fund'.
5. The GSK Global Equity Fund was made available as a self-select option.

Following these changes, the Trustee updated the SIP (October 2023) after obtaining written advice from Mercer and after consulting with the principal employer.

All changes agreed by the Trustee during the Scheme Year were implemented after obtaining written advice from Mercer.

1. Governance Arrangements

The Trustee is responsible for the investment of the Plan assets. The Trustee takes some decisions itself and delegates others (either directly or indirectly) to the Joint Investment Committee ("**JIC**"), the Joint Audit, Risk & Operations Committee ("**JAROC**") the Joint DC Committee ("**JDCC**") or to external parties, such as investment advisers or asset managers.

When deciding which decisions to take itself and which to delegate, the Trustee has taken into account whether it has the appropriate training and expert advice in order to make an informed decision, as well as the Trustee's ability to effectively execute the decision. The Trustee has established the following decision-making structure.

<table>
<tr><td>Trustee
Set structures and processes for carrying out its role.
Determine (with assistance as required) the investment strategy
Determine (with assistance as required) the climate change policy.
Monitor the JDCC and consider proposals made by the JDCC.
Select and monitor asset managers of the DC and AVC assets.
Select the DC and AVC investment options.
Select and monitor investment advisers.</td><td>JDCC
Review all aspects of the Plan that relate directly to the AVC and DC arrangements, including investments, risk monitoring, education and operations.
Aid in the selection and monitoring of the investment advisers and asset managers for the AVC and DC assets of the pension schemes.
Assist the Trustee with setting the asset allocation of funds.
Set structures for implementing the climate change policy and make day to day decisions relevant to the operation of the climate change policy.
Require the asset managers to operate within the terms of this statement so far as practical.</td></tr>
<tr><td>Investment Advisers
Advise on all aspects of the investment of the Plan assets, including ESG and implementation.
Advise on this statement.
Provide required training.
Advise the Trustee on suitability of the benchmarks used.
Provide assistance to the Trustee and JDCC in meeting their objectives.</td><td>Asset Managers
Operate within the terms of this statement and their written contracts.
Select the individual investments within their portfolios (e.g. individual stocks, bonds, derivatives, repos, etc as applicable) with regard to their suitability, including consideration of the impact on portfolio diversification.</td></tr>
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The Trustee confirms that the governance approach outlined above in Section 1 was operated throughout the year to 31 December 2023.

2. Objectives and Implementation of the DB AVC Holdings of the Plan

The JDCC recognises that members holding DB AVCs have differing investment needs, that these may change during the course of their working lives, and that they may have differing attitudes to risk. The JDCC regards its primary objective as making available a range of investment funds which enable members to tailor the strategy for their assets to their own needs. The JDCC believes that members should generally make their own investment decisions based on their individual circumstances. The JDCC also recognises that members may not believe themselves qualified to take investment decisions. As such, the Trustee make available default options to members.

The Trustee confirms that the approach outlined in Section 2 was operated throughout the year to 31 December 2023. Specific details are included through this section:

Kinds of investments to be held

The review of the main investment option was concluded in March 2023 with all changes implemented in May 2023.

The investments (fund type, management style and asset allocations) used in the main investment strategy were reviewed as part of this exercise. The target of the main investment arrangement was also reviewed, taking into account the demographics of the Scheme, projected pot sizes for members, how members have been taking their benefits at retirement as well as industry data.

<u>2.1 Investment Objectives</u>

In investing the assets of the Plan in a prudent manner, the Trustee's objectives are as follows:

1. To provide an appropriate range of pooled investment funds that are intended to meet the varying investment needs and risk tolerances of members so they may satisfy the reasonable risk/return combinations appropriate for most Plan members.
2. To select appropriate investment managers, unitised funds and/or insurance companies to manage each of the investment options.
3. To inform members about their investment options, particularly in relation to the potential risks and rewards of each option.
4. To provide an investment option to members who do not select their own investment options (and who are permitted under the Plan’s rules to exercise such a default).
5. To monitor and take advice on the suitability of the investment options provided.
6. To take appropriate advice from the Trustee’s investment and legal advisers in order to make informed decisions.
7. To act in the interests of the membership of the Plan as a whole.

<u>2.2 Investment Strategy</u>

The JDCC is responsible for reviewing all aspects of the Plan that relate directly to the DC arrangements (in which members DB AVCs are invested), including investments, risk monitoring, education and operations. Following such review, the JDCC may take action for the efficient and effective operation of the DC arrangements, although ultimately it has no power, except where this has been delegated by the Trustee from time to time.

The investment objectives for the DB AVCs are implemented using a range of investment options including equity, diversified growth, bond and cash funds. Both active and passive management options are offered to members, depending on asset class. The current main lifecycle strategy, the GSK Lifecycle Drawdown Option, targets income drawdown and automatically switches members' funds from growth assets, such as global equity and diversified growth assets into assets with a lower risk and return, designed to reduce volatility whilst retaining exposure to growth assets. This lifecycle is the main investment arrangement offered to members of the Plan.

Two alternative lifecycles for members targeting the purchase of an inflation-linked annuity at retirement, GSK Lifecycle Annuity Option, and cash lump sums at retirement, GSK Lifecycle Cash Option are also available.

The GSK Lifecycle Annuity Option and the GSK Lifecycle (pre-2014) Options are legacy default investment options.

Kinds of investments to be held (*continued*)

The details of the types of investment referenced in the SIP are consistent with the fund range offered to members. The strategy remains consistent with this policy in the SIP.

The Trustee aims to make available a range of options which satisfy the needs of the majority of members and in doing so attempt to find an appropriate balance in the range and kind of investments offered to members to offer flexibility and choice, as well as simplicity and cost control.

The structures of all of the lifecycle options were chosen so as to try to deliver high levels of investment returns in the long term while providing some protection against changes in the amount of members' benefits as they approach retirement.

It is the Trustee's policy to provide suitable information for members so that they can make the appropriate investment decisions. The range of funds was chosen by the Trustee after taking expert advice from the Trustee's investment advisers.

The balance between different kinds of investments

The investments used as part of the main investment option are reviewed on a triennial basis. The review was concluded in March 2023 with all changes implemented in May 2023. The balance between different kinds of investment throughout the main investment strategy was considered as part of this review.

The JDCC, on behalf of the Trustee, monitors and considers the performance of investments on a regular basis through the consideration of the quarterly investment performance report, which details the risk and return of options within the Scheme. During the Scheme Year, four JDCC meetings were held, during with investment performance was discussed with the Trustee's Investment Advisers.

The Trustee hosts factsheets for each of the funds available to members on the Legal & General ("L&G") platform and publishes an annual summary performance report for members. This is to ensure that members are provided with suitable information by which to make decisions. The Trustee hosts factsheets for each of the funds available to members on the Legal & General ("L&G") platform and publishes a quarterly summary performance report for members. This is to ensure members are provided with suitable information by which to make decisions.

Benefits for members with DB AVC holdings are determined by the value of members' individual accounts at retirement. A member's retirement benefits depend on:

- the level of contributions made by the member or made on the member's behalf, including prior transfer values from other arrangements (if applicable);
- investment returns achieved (net of fees); and
- where applicable, annuity terms prevailing at the time of the member's retirement.

The Trustee has a reasonable expectation that the long-term return on the investment options that invest predominantly in equities should exceed price inflation and general salary growth. The long-term expected return on diversified growth assets is to achieve equity-like returns, with less volatility than equities. The long-term returns on the bond and cash options are expected to be lower than those on the predominantly equity options. However, bond funds are expected to help reduce volatility in relation to the price of annuities giving some protection in the amount of secured pension for members closer to retirement.

Clearly bonds themselves will not provide a hedge against changes in the demographic assumptions insurers use to price annuity contracts. Cash funds are expected to provide protection against changes in short-term capital values, and may be appropriate for members receiving part of their retirement benefits in the form of tax-free cash.

Expected return on investments

The Trustee monitors the performance of the funds against their stated objectives and benchmarks on a quarterly basis. The Investment Adviser's performance report also highlights any changes to the Investment Adviser's manager research rating.

The performance report was updated during the Scheme Year to include monitoring of example member investment journeys at different ages, as well as a performance comparison against alternative 'off-the-shelf' investment strategies.

The de-risking phases of the Lifecycle Options are reviewed against their relative target outcomes as a means of assessing their performance relative to members' buying power of their chosen retirement target.

The JDCC will meet with any fund manager that is struggling to meet its investment objectives, and review whether continued investment is appropriate. No mandates were removed during the Scheme Year.

2.3 Risk Measurement and Management

The Trustee regards "risk" as the likelihood of failing to achieve the objectives and policies detailed above and seeks to minimise these risks, in so far as is possible. The Trustee recognises the key risk is that members will have insufficient savings for retirement or savings that do not meet their expectations. The Trustee considered this risk when setting the investment options and strategy for the Plan. The Trustee's policy in respect of risk measurement methods and risk management processes is set out in this section.

The Trustee has considered risk from a number of perspectives in relation to the DB AVCs including the main and legacy default options. The list below is not exhaustive, but covers the main risks considered by the Trustee to be financially material in formulating the policy regarding both the main and legacy default investment options and alternative offerings to members.

Type of Risk	Risk	Description	How is the risk monitored and managed?
Market risks	Inflation risk	The risk that returns over members' working lives do not keep pace with inflation.	The Trustee makes available a range of funds, across various asset classes, with the majority expected to

Type of Risk	Risk	Description	How is the risk monitored and managed?
	Currency risk	The risk that fluctuations in foreign exchange rates will cause the value of overseas investments to fluctuate.	keep pace with inflation. Members are able to set their own investment allocations, in line with their risk tolerances. Within active funds, management of many of these market risks is delegated to the asset manager(s). The JDCC considers fund performance, including that of the investment options, on a quarterly basis.
	Credit risk	The risk that the issuer of a financial asset, such as a bond, fails to make the contractual payments due.	
	Equity, property and other price risk	The risk that market movements lead to a substantial reduction in the value of a member's savings.	
	Capital	The risk that the monetary value of a member's account falls.	The Trustee's objective is to provide investment options [with appropriate risk characteristics].
Liquidity risk		The risk that the Plan's assets cannot be realised at short notice in line with member demand.	The Plan is invested in daily dealt and daily priced pooled funds via an insurance policy with Legal and General. Asset managers are expected to manage the liquidity of assets in the underlying strategies and keep exposures to any illiquid assets to prudent levels.
Asset Manager risk		The risk that the appointed asset managers do not meet their fund performance objectives, fail to carry out operational tasks, do not ensure safe-keeping of assets or breach agreed guidelines.	The Trustee considers fund returns relative to the benchmark. This is monitored on a quarterly basis. The Trustee considers the Investment Adviser's rating of the investment managers on an ongoing basis and monitors the Plan's active funds against a robust framework.

Type of Risk	Risk	Description	How is the risk monitored and managed?
Pension Conversion risk		The risks that the member is invested in a strategy that does not reflect the way in which they intend to take their benefits at retirement.	The Trustee makes available lifestyle strategies for members. Lifestyle strategies automatically switch member assets into investments whose value is expected to be less volatile relative to how the member wishes to access their pension savings as they approach retirement age. Members can select a lifestyle strategy in accordance with their personal preferences and retirement objectives.
Environmental, Social and Corporate Governance ("**ESG**") risk		The risk that ESG concerns, including climate change, have a financially material impact on the return of the Plan's assets.	The management of this risk has been considered and asset managers are expected to integrate this into their processes. The Trustee reviews the asset managers' policies and actions in relation to this from time to time. The Trustee policy on Responsible Investment and Corporate Governance is set out in Section 3.1.

Type of Risk	Risk	Description	How is the risk monitored and managed?
Operational risk		The risk of fraud, ineffective governance structure, poor advice or acts of negligence in the operation of the Plan.	The Trustee has sought to minimise such risk by ensuring that all advisers and third party service providers are suitably qualified and experienced and that suitable liability and compensation clauses are included in all contracts for professional services received. The Trustee reviews the Plan risk dashboard on a quarterly basis to ensure risks are identified and adequate controls are in place to ensure the effective running of the Plan including areas such as the effectiveness of the committee, communications and adequate provisions in place with service providers as well as a number of the other risks previously listed.

Risks, including the ways in which risks are to be measured and managed

As detailed in the risk table above, the Trustee considers both quantitative and qualitative measures for these risks when deciding investment policies, strategic asset allocation and the choice of fund managers, funds and asset classes.

The Trustee provides a range of investment options (including three lifestyle strategies) which enable members to reflect in their selection of funds the level of risk they wish to take in light of their own individual circumstances. In member-facing communications the Trustee highlights a number of risks that a member may face as a result of investing in any particular fund.

ESG risk was also managed throughout the year, with considerations given to the climate-related disclosures as requested by the Occupational Pension Schemes (Climate Change Governance and Reporting) Regulations. During the Scheme Year, the 2023 TCFD Report was published, and work is underway on the 2024 TCFD Report.

The Trustee also reviews the quarterly investment reports, which monitor the volatility of the investment strategy. The risk associated with China/Taiwan exposures was monitored early in the year. During the year the Trustee also added additional monitoring within the performance report to highlight the impact of performance on the savings of example "strawperson" members at different time horizons from retirement.

The Plan operates a risk management framework and as part of this framework the Scheme maintains a register of the key risks, including investment risks. This rates the impact and likelihood of the risks and summarises existing mitigations and additional actions. During the Scheme Year, the Trustee continued to develop and implement its risk management framework, considering enhanced risk management information, integrated risk reporting, an updated risk register and associated controls monitoring plans during its quarterly meetings.

The Trustee considers these risks to be applicable across the lifetime of a member's time within the DC Section of the Scheme.

The Trustee considers these risks to be applicable across the lifetime of a members' time within the AVCs Holdings DB Section of the Plan.

Due to the complex and interrelated nature of these risks, the Trustee considers these risks in a qualitative rather than quantitative manner as part of each formal strategy review. Some aspects of the risks may be modelled explicitly.

In addition, the Trustee measures risk in terms of the performance of the assets compared to the benchmarks on a regular basis, usually quarterly, along with monitoring any significant issues with the asset managers that may impact their ability to meet the performance targets set by the Trustee.

The Trustee has established a risk register and monitors risks in accordance with this.

3. The Trustee's Investment Policies

3.1 General Investment Policy (including ESG and Stewardship)

The Trustee and the JDCC expects the underlying asset managers to manage the assets under the terms of their respective contracts. In addition, asset managers pay commissions to third parties on many trades they undertake in the management of the assets.

For the DB AVCs, the fund range offered to members is accessed through a platform provided by Legal & General Assurance (Pensions Management) Limited ("L&G"). The Trustee accesses the platform via a long-term insurance contract with L&G. L&G operates within the terms of this Statement and the written contract. The Trustee reviews the liquidity of the funds offered to members to ensure that assets are readily realisable.

The Trustee considers sustainable investment to be the integration of environmental, social and governance factors into investment decisions. The Trustee believes that environmental, social and governance ('ESG') factors may have a material impact on investment risk and return outcomes, and that good stewardship can create and preserve value for companies and markets as a whole. The Trustee also recognises that long-term sustainability issues, particularly climate change, present risks and opportunities that increasingly may require explicit consideration. The Trustee aims to be an engaged and responsible long-term investor in the assets and markets in which it invests directly or indirectly. The Trustee believes that the integration of ESG factors within asset managers' investment processes may have the ability to have a positive impact on the risk and the sustainable long-term expected returns from the Plan's investments.

Financially material considerations over the appropriate time horizon of the investments, including how those considerations are taken into account in the selection, retention and realisation of investments

The investment performance report is reviewed by the Trustee on a quarterly basis – this includes ratings (both general and specific to ESG requirements) from the Investment Adviser. All of the managers remained highly rated during the Scheme Year. The Trustee monitors long-term performance and ESG ratings for current investment managers and considers this information when selecting new investment managers.

The Trustee continues to monitor and engage with managers as part of regular update meetings held with them to discuss topics of interest. One of the DC Section's key investment managers, Legal & General Investment Management (LGIM), attended the JDCC's meeting in November 2023 to discuss performance and operational matters. The Trustee remains satisfied with LGIM's appointment.

The Trustee expects the underlying managers to evaluate ESG factors, including climate change considerations, exercising voting rights and stewardship obligations attached to investments, in accordance with their own corporate governance policies and current best practice, including the UK Corporate Governance Code and UK Stewardship Code.

The exercise of the rights (including voting rights) attaching to the investments

The Trustee delegates the exercise of voting rights associated with investments to the underlying Asset Managers, and review this annually.

The following funds contain an allocation to equities:

- LGIM - UK Equity Index
- LGIM – Future World UK Equity Index
- LGIM - World (ex-UK) Developed Equity Index
- LGIM - Future World Developed (ex UK) Equity Index Fund
- LGIM - World (ex-UK) Developed Equity Index (Currency Hedged)
- LGIM - Future World Developed (ex UK) Equity Index Fund – GBP Hedged
- LGIM - World Emerging Markets Equity Index
- LGIM - Future World Emerging Markets Equity Index Fund
- LGIM – Global Developed Small Cap Index Fund
- LGIM - Diversified Return
- Nordea - Diversified Return
- Fulcrum – Diversified Absolute Return
- Man Group – Alternative Style Risk Premia
- HSBC – Islamic Global Equity

The voting records of the Asset Managers are summarised in Appendix A.

Particular focus is placed on LGIM as they hold the most significant equity mandates in the Plan. The examples shown in Appendix B demonstrate examples of significant votes cast by the Plan's Asset Managers where voting rights have been used to influence change with regard to ESG-related issues.

The Trustee has also considered which areas would constitute 'significant' when it comes to company engagement by their fund managers. More information regarding this is included with the voting activity in the Appendix.

Undertaking engagement activities in respect of the investments (including the methods by which, and the circumstances under which, trustees would monitor and engage with relevant persons about relevant matters)

The Trustee wishes to encourage best practice in terms of corporate activism. It therefore encourages its Asset Managers to discharge their responsibilities in respect of investee companies in accordance with relevant legislation and codes.

Where the Scheme invests in pooled funds, the Trustee requires its Asset Managers to engage with the investee companies on the Trustee's behalf.

All managers of funds within the DC Section of the Scheme are signatories of the UK Stewardship Code 2020 (i.e. LGIM, Fulcrum, Nordea, Man Group and HSBC).

Most recently, the JDCC reviewed the carbon metrics of their funds at the November 2023 JDCC meeting, as part of work in respect of the 2024 TCFD report.

The Trustee regularly meets with its Asset Managers and may challenge managers about relevant matters. The Trustee is looking to enhance its reporting on manager engagement going forward

The Trustee does not wish to interfere with the day-to-day investment decisions of its investment managers. The Trustee reviews the compliance of managers against the UK Stewardship Code on an annual basis and engages with managers who are not aligned with best practice standards.

3.1.1 - Climate change

The Trustee has set out its policy relating to the governance of climate related risks in a separate document, the TCFD Report. The Trustee includes its climate change targets and portfolio metrics in the TCFD Report.

The Trustee supports the principle of good corporate governance and shareholder activism and, for relevant mandates, prefers its investment managers to have an explicit strategy, outlining the circumstances in which they will engage with a company (or issuer of debt or stakeholder, if applicable) on relevant matters (including performance, strategy, capital structure, management of actual or potential conflicts of interest, risks, social and environmental impact and corporate governance) and how they will measure the effectiveness of this strategy. The Trustee reviews regularly the voting strategy of its investment managers.

3.1.2 - Arrangements with Asset Managers: Policy

The Trustee believes that an understanding of, and engagement with, asset managers' arrangements is required to ensure they are aligned with the Trustee's policy, including its Sustainable Investment policy. In accordance with latest regulation, it is the Trustee's policy to ensure that the following are understood and monitored:

- How asset manager arrangements incentivise asset managers to align their strategy and decisions with the Trustee's policies;

How the arrangement with the Asset Manager incentivises the Asset Manager to align its investment strategy and decisions with the trustees policies

The section below, titled "Arrangements with Asset Managers – Implementation" provides further information on the implementation of these policies.

The Trustee will review an appointment if the investment objective for an underlying manager's fund changes to ensure it remains appropriate and consistent with the Trustee's wider investment objectives.

Over the year no mandates were terminated due to performance concerns or as a result of changes in underlying targets.

Previously the Trustee has terminated appointments where the managers were not meeting long-term performance targets.

The JDCC, on behalf of the Trustee, met with LGIM in November 2023 to discuss investment performance, objectives and operational matters around its fund management. The Trustee remains comfortable with the appointment of LGIM as an Asset Manager for the Scheme.

- How asset manager arrangements incentivise asset managers to make decisions based on assessments about medium to long-term financial and non-financial performance of an issuer of debt or equity and to engage with issuers of debt or equity in order to improve their performance in the medium to long-term;

How the arrangement incentivises the Asset Manager to make decisions based on assessments about medium to long-term financial and non-financial performance of an issuer of debt or equity and to engage with issuers of debt or equity in order to improve their performance in the medium to long-term

The section below, titled "Arrangements with Asset Managers – Implementation" provides further information on the implementation of these policies.

At fund manager monitoring meetings, the JDCC asks Asset Managers to incorporate a section on investment decisions taken over the recent period and their forward-looking assessment of market conditions.

This is also covers examples of financial and non-financial considerations around investments where the managers are expected to take into account the impact of these considerations into the forward-looking assessment on the performance of an issuer of debt or equity.

No further action was taken by the JDCC or Trustee over the period covered by this statement.

- How the method (and time horizon) of the evaluation of asset managers' performance and their remuneration are in line with the Trustee's policies;

How the method (and time horizon) of the evaluation of the Asset Manager's performance and the remuneration for asset management services are in line with the trustees' policies

The section below, titled "Arrangements with Asset Managers – Implementation" provides further information on the implementation of these policies. At fund manager monitoring meetings, the JDCC asks Asset Managers to incorporate a section on how ESG issues are integrated into their strategies in presentations when updates are provided, or when managers are appointed. This can include a section on voting, engagement and the methods in which ESG is integrated.

If the JDCC is not satisfied with the progress that managers have made then further action or information would be sought from managers. If no further progress was to be made, the JDCC and the Trustee would consider whether retaining the mandate is appropriate.

The Trustee has successfully challenged managers to increase their disclosure following the outcome of Stewardship Code assessments, which has led to positive results in prior years.

From the information delivered over the year, the JDCC is satisfied with the progress of the managers in relation to ESG matters and no further action was taken over the period covered by this statement.

Over the year to 31 December 2023, the Trustee reviewed the performance of the Scheme's investment managers on a quarterly basis. These reviews consider the performance of the funds against their stated aims, objectives and policies. The Trustee's focus is on long term performance but they may review an underlying investment manager's appointment under certain circumstances. The Trustee reviews the investment manager fees as part of the annual Value for Members assessment.

- Portfolio turnover costs incurred by the asset managers, in the context of the asset manager's targeted portfolio turnover (defined as the frequency within which the assets are expected to be bought or sold);

How the Trustee monitors portfolio turnover costs incurred by the Asset Manager, and how it defines and monitors targeted portfolio turnover or turnover range

The section below, titled "Arrangements with Asset Managers – Implementation" provides further information on the implementation of these policies.

The Trustee considers the level of transaction costs as part of its annual Value for Members assessment, last carried out as at 31 December 2023 and by publishing this information as part of the costs and charges disclosures mandated by regulations governing the Chair's Statement.

As the Scheme invests through pooled funds, the Trustee is unable to define target portfolio turnover ranges for funds. However, it will engage with an underlying investment manager if portfolio turnover is higher than expected.

- Duration of the arrangement with the asset manager;

The duration of the arrangement with the Asset Manager

The section below, titled "Arrangements with Asset Managers – Implementation" provides further information on the implementation of these policies.

There were no terminations over this year of arrangements within the main DC Section of the Scheme. The JDCC continues to monitor the performance of the managers against their appointed mandates to ensure that they remain appropriate as part of the Lifecycle or self-select range.

The focus of performance assessments is based on longer term outcomes so the Trustee would not ordinarily expect to terminate an underlying manager based purely on short term performance.

3.1.3 - Arrangements with Asset Managers: Implementation

The Trustee through delegation to the JDCC considers their investment adviser's assessment of how each asset manager embeds ESG into its investment process and how the asset manager's responsible investment philosophy aligns with the Trustee's responsible investment policy. This includes consideration of the underlying asset managers' policy on voting and engagement and compliance with the Stewardship Code. The Trustee will use this assessment as part of their considerations when taking decisions around selection, retention and realisation of asset manager appointments.

The underlying asset managers are appointed based on their capabilities and, therefore, their perceived likelihood of achieving the expected return and risk characteristics required for the asset class being selected. Whilst the Trustee notes that their ability to influence decision making within pooled fund structures is limited, the underlying asset managers are aware that their continued appointment is based on their success in delivering the mandate for which they have been appointed to manage. As such, the Trustee believes this creates alignment between the asset managers and themselves. Consequently, if the Trustee is dissatisfied, then they will look to replace the manager. If the investment objective for a particular asset manager's fund changes, the Trustee will review the appointment to ensure it remains appropriate and consistent with the Trustee's wider investment objectives.

The JDCC meets with underlying asset managers annually and receives updates from the managers on their ESG policies and engagement activity. Where needed the JDCC, on behalf of the Trustee, will challenge managers on their policies and instances where managers may not be aligned with best practices within the industry. This action is taken to try to ensure continuing improvement over the medium to long term in the performance of assets from both a financial and non-financial perspective.

The JDCC receives and considers performance reports from their investment advisers on a quarterly basis, which present performance information for the funds over three months, one year, three years, five years, and since inception. The JDCC reviews the absolute performance, relative performance against a suitable index used as the benchmark, and against the underlying manager's stated target performance (over the relevant time period) on a net-of-fees basis. Whilst the JDCC and the Trustee's focus is on long-term performance, they also take shorter-term performance into account.

If an underlying manager is not meeting performance objectives, or their investment objectives for the fund have changed, the Trustee may review the suitability of the manager, and change the manager where required. As managers are remunerated based on the level of assets managed, there is a direct interest for asset managers to perform in line with objectives in order to retain mandates and continue to receive compensation on an ongoing basis.

The Trustee does not currently define target portfolio turnover ranges for asset managers, particularly as the Trustee uses pooled funds, however, the JDCC will engage with an asset manager, on behalf of the Trustee, if portfolio turnover is higher than expected. The JDCC considers portfolio turnover costs indirectly through consideration of trading costs incurred throughout the year for a fund, provided within transaction cost data the Trustee receives annually, and is considered as part of the annual value for members assessment.

All the funds used within the DB AVCs are open-ended, with no set end date for the arrangements. The main Lifecycle Strategy, alternative Lifecycle strategies and the self-select fund range are reviewed on at least a triennial basis. An underlying manager's appointment may be terminated if it is no longer considered to be optimal, nor have a place in the lifecycle strategies or self-select fund range.

The policies detailed in this section apply across the range of investment options made available to members including the main GSK Lifecycle investment option, the alternative GSK Lifecycle options and the self-select GSK investment fund range.

The Trustee confirms that the investment policies outlined in Section 3 were followed throughout the year to 31 December 2023.

The Trustee did not seek member views in forming their initial approach around ESG, stewardship, climate change and non-financial matters within the Plan's investments. Since adopting their current approach, the Trustee has sought member views and will continue to seek these views from time to time and will use these to inform decisions regarding the development of the Trustee's policy in the future. The Trustee will continue to review this policy regularly to ensure that the policy is appropriate for the Plan's membership.

The extent (if at all) to which non-financial matters are taken into account in the selection, retention and realisation of investments

There were no non-financial matters directly considered during the reporting period.

Assets are mainly invested on regulated markets. Some funds may have exposure to securities not on regulated markets. The Trustee expects that asset managers will monitor these and keep these to prudent levels.

The Trustee will review this SIP at least every three years and immediately following any significant change in investment policy. The Trustee will take investment advice and consult with the Sponsoring Employer over any changes to the SIP.

The Trustee has appointed investment advisers. The advisers operate under agreements to provide services which ensures the Trustee and JDCC are fully briefed to take decisions themselves and to monitor those they delegate.

The members can invest in a range of fund options. It is the Trustee's policy to consider:

- The risks and rewards of a range of different asset allocation strategies.
- The suitability of each asset class in the lifecycle strategies.
- The suitability of the possible styles of investment management and the option of manager diversification for members.
- The need for appropriate diversification both across asset classes and within asset classes.
- The liquidity of the funds offered to members to ensure that assets are readily realisable.

Realisation of Investments

The Trustee receives an administration report on a quarterly basis to ensure that core financial transactions are processed within service level agreements (SLAs) and regulatory timelines.

All funds are daily dealt pooled investment vehicles, accessed by an insurance contract. This ensures the assets are readily realisable.

3.2. Policy in Relation to the Main Lifecycle Investment Option

3.2.1 - The Plan's Main Lifecycle Investment Options

The GSK Lifecycle Drawdown Option is the main lifecycle investment option for the Plan. Over the years just prior to retirement, this option de-risks to an asset allocation designed to be appropriate for a typical member who intends to access their benefits via income drawdown at retirement.

In addition, the Plan has two legacy investment options where some members' accrued funds and contributions have previously been automatically directed to this investment option from the previous main investment options. These are the GSK Lifecycle (pre-2014) Option and the GSK Lifecycle Annuity Option.

As a result of this mapping activity, the GSK Lifecycle Drawdown Options ("current default investment option"), the GSK Lifecycle Annuity Option ("legacy investment option") and GSK Lifecycle (pre-2014) Option (legacy investment option) are treated as "technical default options". Neither the current default investment option or legacy investment options are classed as default arrangements for the purposes of auto-enrolment.

Until June 2014, the main lifecycle investment option was the GSK Lifecycle (pre 2014) Option (legacy investment option). The GSK Lifecycle Annuity Option (legacy investment option) was then implemented as the main investment option in June 2014. At that time, members with more than 10 years to their selected retirement date were moved to the GSK Lifecycle Annuity Option (legacy investment option) and members with less than 10 years until their selected retirement date continue to be invested in the legacy GSK Lifecycle (pre 2014) investment option (legacy investment option), unless they have made an alternative investment choice.

The GSK Lifecycle Drawdown Option (current investment option) was implemented as the main investment option in July 2021. At that time, members with more than three years to their selected retirement date (as at 1 July 2021) and who were invested in the GSK Lifecycle Annuity Option (legacy investment option) were moved to the GSK Lifecycle Drawdown Option (current investment option). Members at that time with three years or less to their selected retirement date (as at 1 July 2021) and invested in the GSK Lifecycle Annuity Option (legacy investment option) continue to be invested in the GSK Lifecycle Annuity Option (legacy investment option), unless they have made an alternative investment choice.

The current default investment option (the GSK Lifecycle Drawdown Option) is made up of three phases:

1. 100% allocation to the GSK Global Equity Fund for members more than 15 years from their Target Retirement Date. This is known as the "growth phase".
2. The funds will gradually switch such that there is a 100% allocation to the GSK Lifecycle Fund at 10 years to the Target Retirement Date. This is known as the "consolidation phase".
3. When members reach 5 years from their Target Retirement Date, they will gradually be switched to the GSK Retirement Income Fund and GSK Cash Fund (according to the table below), in order to prepare the member for income drawdown. This is known as the "pre-retirement phase".

Years to Retirement Date	**GSK Global Equity Fund**	**GSK Lifecycle Fund**	**GSK Retirement Income Fund**	**GSK Cash Fund**
15+	100%	0%	0%	0%
14	80%	20%	0%	0%
13	60%	40%	0%	0%
12	40%	60%	0%	0%
11	20%	80%	0%	0%
5 - 10	0%	100%	0%	0%
4	0%	80%	20%	0%
3	0%	60%	40%	0%
2	0%	40%	57%	3%
1	0%	20%	74%	6%
0	0%	0%	90%	10%

<u>3.2.2 - Legacy Investment Options</u>

The GSK Lifecycle Annuity Option (a legacy default option) is made up of three phases:
1. Identical to the "growth phase" referenced above.
2. Identical to the "consolidation phase" above.
3. When members reach 5 years from their Target Retirement Date, they will gradually be switched to the GSK Targeting Annuity Fund and GSK Cash Fund (according to the table below), in order to prepare the member for annuity purchase. This is known as the "pre-retirement phase".

Years to Retirement Date	**GSK Global Equity Fund**	**GSK Lifecycle Fund**	**GSK Targeting Annuity Fund**	**GSK Cash Fund**
15+	100%	0%	0%	0%
14	80%	20%	0%	0%
13	60%	40%	0%	0%
12	40%	60%	0%	0%
11	20%	80%	0%	0%
5 - 10	0%	100%	0%	0%
4	0%	80%	20%	0%

3	0%	60%	40%	0%
2	0%	40%	52%	8%
1	0%	20%	64%	16%
0	0%	0%	75%	25%

The GSK Lifecycle (pre 2014) Option (legacy investment option), comprises a 100% allocation to the GSK Global Equity Index Fund until the member is 10 years from their normal retirement date or their selected target retirement date, in order to build up their account, this is known as the "growth phase". During the 10 years up to this date, the member's account will gradually be switched to the GSK Targeting Annuity and GSK Cash Fund (according to the table below), in order to protect the value of their account. This is known as the "pre-retirement phase".

Years to Retirement Date	GSK Global Equity Index Fund	GSK Targeting Annuity Fund	GSK Cash Fund
10+	100%	0%	0%
9	90%	7.5%	2.5%
8	80%	15%	5%
7	70%	22.5%	7.5%
6	60%	30%	10%
5	50%	37.5%	12.5%
4	40%	45%	15%
3	30%	52.5%	17.5%
2	20%	60%	20%
1	10%	67.5%	22.5%
0	0%	75%	25%

3.2.3 - The aims of the main investment option

The aims of the main lifecycle and the legacy lifecycle investment options, and the ways in which the Trustee seeks to achieve them are detailed below:

- To generate returns in excess of inflation during the growth phase of the strategy whilst managing downside risk.

The GSK Lifecycle Drawdown Option ("main investment option") and GSK Lifecycle Annuity Option's (legacy investment option) growth phases invest in equities and other growth-seeking assets (through an absolute return/diversified growth fund). These investments are expected to provide equity-like growth over the long term with some downside protection and some protection against inflation erosion. The growth phase of the GSK Lifecycle (pre 2014) Option (legacy investment option) invests in equities alone. These investments are expected to provide growth over the long term and some protection against inflation erosion. The GSK Lifecycle (pre-2014) Option (legacy investment option) de-risks out of equities sooner, to account for the fact that equities can be subject to downside risk, and because it does not have a "consolidation phase".

- To provide a strategy that reduces investment risk for members as they approach retirement.

As a member's pot grows, investment risk will have a greater impact on member outcomes. Therefore, the Trustee believes that a main lifecycle strategy that seeks to reduce investment *risk as the member approaches retirement is appropriate. Moreover, as members approach retirement, the Trustee believes the primary aim should be to provide protection against a mismatch between asset risk factors and the expected uses of retirement benefits.*

The Trustee considers the level of risk within the GSK Lifecycle Drawdown Option (main investment option) in the context of the need to maintain an expected risk and return suitable for income drawdown.The Trustee reduces investment risk via automated lifestyle switches over the five year period to a member's selected retirement date. Investments are switched firstly into the GSK Retirement Income Fund, which invests in a mix of assets to provide an appropriate expected risk and return for income drawdown. In the years leading up to retirement, an allocation to a cash fund is introduced for capital preservation purposes, and to allow members to take a pension commencement lump sum.

The Trustee considers the level of risk within the GSK Lifecycle Annuity Option (legacy investment option) and the GSK Lifecycle (pre-2014) Option (legacy investment option) in the context of the variability of returns relative to annuity prices and cash rates. The aims of the legacy default investment option are achieved via automated lifestyle switches over the ten year period to a member's selected retirement date for the GSK Lifecycle (pre-2014) Option (legacy investment option) and the five year period for GSK Lifecycle Annuity Option (legacy investment option). Investments are switched firstly into the GSK Targeting Annuity Fund, which invests in a mix of UK government bonds and investment grade corporate bonds to broadly match short term changes in the price of inflation -linked annuities. In the years leading up to retirement, an allocation to a cash fund is introduced for capital preservation purposes, and to allow members to take a pension commencement lump sum.

- For the GSK Lifecycle Drawdown Option (main investment option), to provide exposure, at retirement, to assets that are broadly appropriate for an individual planning to take their benefits via income drawdown.

At the member's selected retirement date, member's assets will be invested in the GSK Retirement Income Fund and a money market fund.

- For the GSK Lifecycle Annuity Option (legacy investment option) and the GSK Lifecycle (pre-2014) Option (legacy investment option), to provide exposure, at retirement, to assets that are broadly appropriate for an individual planning to take their benefits via an inflation-linked pension at retirement.

At the member's selected retirement date, the GSK Lifecycle Annuity Option (legacy investment option) and GSK Lifecycle (pre-2014) Option (legacy investment option) , member's assets will be invested in a combination of the GSK Targeting Annuity Fund and a money market fund.

The Trustee's policies in relation to the main and legacy lifecycle investment options are detailed below:

- The GSK Lifecycle Drawdown Option (main investment option) and GSK Lifecycle Annuity Option (legacy investment option) manage investment risks through a diversified strategic asset allocation consisting of traditional and alternative assets. The GSK Lifecycle (pre-2014) Option (legacy investment option) manages investment risks through a diversified strategic asset allocation consisting of traditional assets. Risk is not considered in isolation, but in conjunction with expected investment returns and outcomes for members. In designing this lifecycle investment option, the Trustee has explicitly considered the trade-off between risk and expected returns. In particular, when reviewing the investment strategy of this lifecycle investment option, the Trustee considers risk quantitatively in terms of the variability of investment returns and potential retirement outcomes for members. From a qualitative perspective, the Trustee also considers risk in terms of the (mis)alignment of investments with the retirement benefits targeted by the main lifecycle investment option.

- Assets in the main lifecycle investment option and legacy investment options are invested in the best interests of members and beneficiaries, taking into account the profile of members. In particular, the Trustee considered high level profiling analysis of the Plan's membership in order to inform decisions regarding the main lifecycle investment option. Based on this understanding of the membership, the current default investment option target of income drawdown at retirement is considered appropriate. Members invested in the legacy investment options, which target the purchase of an annuity at retirement, is also considered appropriate.

- Members are supported by clear communications regarding the aims of the main lifecycle investment options and the access to alternative investment approaches. If members wish to, they can opt to choose an alternative lifestyle option or their own investment strategy on joining but also at any other future date. Moreover, members do not have to take their retirement benefits in line with those targeted by the main lifecycle investment option; the target benefits are merely used to determine the investment strategy held pre-retirement.

- Assets in the main lifecycle investment option are invested in daily traded pooled funds which hold highly liquid assets. The pooled funds are commingled investment vehicles which are managed by various investment managers. The safe custody of the Plan's assets is delegated to professional custodians, as appointed by the governing bodies of the respective pooled funds.

Taking into account the demographics of the Plan's membership and the Trustee's views of how the membership will behave at retirement, the Trustee believes that the current main lifecycle investment option is appropriate and will continue to review this overtime, at least triennially, or after significant changes to the Plan's demographic, if sooner.

The Trustee considered high level profiling analysis of the Plan's membership in order to inform decisions regarding the main lifecycle investment option. Based on this understanding of the membership and investment advice, the Trustee considers that the investment option remains appropriate to ensure that assets are invested in the best interests of relevant individuals.

<u>3.3 - Direct Investments</u>
The Pensions Act 1995 distinguishes between investments where the management is delegated to an asset manager under a written contract and those where a product is purchased directly, e.g. the purchase of an insurance policy or units in a pooled vehicle. The latter are known as direct investments.

The Trustee's policy is to review its direct investments and to obtain written advice about them at regular intervals. These include vehicles available for members' AVCs. When deciding whether or not to make any new direct investments the Trustee will obtain written advice and consider whether future decisions about those investments should be delegated to the asset manager(s).

The selection, retention and realisation of assets within the pooled funds are delegated to the respective investment managers in line with the mandates of the funds. Likewise, the investment managers have full discretion (within the constraints of their mandates) on the extent to which social, environmental or ethical considerations are taken into account in the selection, retention and realisation of investments.

The written advice will consider the issues set out in the Occupational Pension Schemes (Investment) Regulations 2005 (as amended by the Occupational Pension Schemes (Charges and Governance) Regulations 2015 and subsequent legislation) and the principles contained in this statement. The regulations require all investments to be considered by the Trustee (or, to the extent delegated, by the asset managers) against the following criteria:

- The best interests of the members and beneficiaries
- Security
- Quality
- Liquidity
- Profitability
- Nature and duration of liabilities
- Tradability on regulated markets
- Diversification
- Use of derivatives

The policy for the Plan's DB AVC assets which are classified as direct investments are set out in this statement.

> The Trustee confirms that the investment policies outlined in Section 3.2 and 3.3 were followed throughout the year to 31 December 2023.

4. Supplementary information to the SIP

There is further information contained in the document titled *'Supplementary information to the Statement of Investment Principles ("SIP") for DB Section AVCs – October 2023'* on the following:

- Additional Voluntary Contribution (AVC) Asset Manager Summary
- Fee Structures for Asset Managers and Advisers

5. Compliance with this statement

The Trustee will review this SIP at least every 3 years and as soon as practicable following a significant change in investment strategy. The Trustee will take investment advice and consult with the Employer over any changes to the SIP.

> As noted earlier in this Statement, the SIP was reviewed during the year and was approved in October 2023, reflecting updates to the Lifecycle Options and fund name changes. The SIP is reviewed on an annual basis.

Appendix A – Manager Voting Responsibility

To ensure voting behaviour is consistent with the Plan's investment objectives and stewardship priorities, the Trustee has classified 'significant votes' as those which consider any one of the following factors with relevant (but not exhaustive) examples:

- **Climate** – Climate change, net zero greenhouse gas emissions
- **Governance** – Board composition, remuneration
- **Environmental impact** – Biodiversity, deforestation
- **Human Rights –** Living wages, gender equality, health and nutrition

The following table details information on the manager voting policies as well as data on key votes undertaken over the year. Mandates where shareholder voting is not applicable are not included in the list below

DB Section

There were no mandates in operation during the year where shareholder voting was applicable

DB AVC Section

Manager	Manager proxy Voting Policy	Key votes undertaken over the year - 1 January 2023 to 31 December 2023
Nordea	Nordea is a fund company with unit holders as clients and they vote based on their policy in the best interest of unitholders. In all its activities, Nordea shall act in the best interests of the customer, and act honestly, fairly and professionally. Nordea funds have an aggregated voting strategy, meaning that they strive to vote for as large part of their total holdings in any given company as possible. Nordea's proxy voting is supported by one external vendor (Institutional Shareholder Services Nordic Investor Services) to facilitate proxy voting, execution and to provide analytic input.	**Diversified Return** Number of meetings eligible to vote:200 Number of resolutions eligible to vote: 2,486 Proportion of votes with management: 83% Proportion of votes against management: 12% Proportion of votes abstained: 5%
HSBC	HSBC exercise their voting rights as an expression of stewardship for client assets. They have global voting guidelines which protect investor interests and foster good practice, highlighting independent directors, remuneration linked to performance, limits on dilution of existing shareholders and opposition to poison pills. HSBC use the leading voting research and platform provider Institutional Shareholder Services (ISS) to assist with the global application of our voting guidelines. ISS reviews company meeting resolutions and provides recommendations highlighting resolutions which contravene our guidelines. They review voting policy recommendations according to the scale of overall holdings. The bulk of holdings are voted in line with the recommendation based on their guidelines.	**Islamic Global Equity** Number of meetings eligible to vote: 107 Number of resolutions eligible to vote: 1,726 Proportion of votes with management: 76% Proportion of votes against management: 23% Proportion of votes abstained: 0%

Manager	Manager proxy Voting Policy	Key votes undertaken over the year - 1 January 2023 to 31 December 2023
	They regard the votes against management recommendation as the most significant. With regards to climate, in their engagement they encourage companies to disclose their carbon emissions and climate-related risks in line with the recommendations of the Task Force on Climate-related Financial Disclosure (TCFD). Where companies in energy intensive sectors have persistently failed to disclose their carbon emissions and climate risk governance, HSBC will generally vote against the re-election of the Chairman. They also generally support shareholder resolutions calling for increased disclosure on climate-related issues.	
LGIM	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 they do not outsource any part of the strategic decisions. Their use of ISS recommendations is purely to augment their 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 they receive from ISS for UK companies when making specific voting decisions. To ensure their proxy provider votes in accordance with their position on ESG, they have put in place a custom voting policy with specific voting instructions. These instructions apply to all markets globally and seek to uphold what they consider are minimum best practice standards which they believe all companies globally should observe, irrespective of local regulation or practice. LGIM retain the ability in all markets to override any vote decisions, which are based on their custom voting policy. This may happen where engagement with a specific company has provided additional information (for example from direct engagement, or explanation in the annual report) that allows them to apply a qualitative overlay to their voting judgement. They have strict monitoring controls to ensure their votes are fully and effectively executed in accordance with voting policies by their service provider. This includes a regular manual check of the votes input into the platform, and an electronic alert service to inform them of rejected votes which require further action.	**LGIM GSK Lifecycle Fund** Number of meetings eligible to vote:11,631 Number of resolutions eligible to vote: 116,944 Proportion of votes with management: 77% Proportion of votes against management: 22% Proportion of votes abstained: 0% **LGIM GSK Retirement Income Multi-Asset Fund** Number of meetings eligible to vote:10,300 Number of resolutions eligible to vote: 106,089 Proportion of votes with management:77% Proportion of votes against management: 22% Proportion of votes abstained: 0% **LGIM GSK Overseas Equity Fund** Number of meetings eligible to vote:10,745 Number of resolutions eligible to vote: 106,616 Proportion of votes with management:76% Proportion of votes against management: 23% Proportion of votes abstained: 0% **LGIM GSK Diversified Growth Fund** Number of meetings eligible to vote:9,090 Number of resolutions eligible to vote: 94,401 Proportion of votes with management:76% Proportion of votes against management: 23%

Manager	Manager proxy Voting Policy	Key votes undertaken over the year - 1 January 2023 to 31 December 2023
		Proportion of votes abstained: 0% **LGIM Global Equity Fund** Number of meetings eligible to vote: 11,174 Number of resolutions eligible to vote: 114,189 Proportion of votes with management: 78% Proportion of votes against management: 22% Proportion of votes abstained: 0% **LGIM GSK UK Equity Index Fund** Number of meetings eligible to vote: 680 Number of resolutions eligible to vote: 10,517 Proportion of votes with management: 94% Proportion of votes against management: 6% Proportion of votes abstained: 0% **LGIM GSK Global Sustainable Equity Fund** Number of meetings eligible to vote: 5,080 Number of resolutions eligible to vote: 52,639 Proportion of votes with management: 80% Proportion of votes against management: 19% Proportion of votes abstained: 0% **LGIM GSK Targeting Annuity Fund** Number of meetings eligible to vote: 2 Number of resolutions eligible to vote: 2 Proportion of votes with management: 100% Proportion of votes against management: 0% Proportion of votes abstained: 0%
Fulcrum	Fulcrum's default choice is to vote as per the Climate Change Policy by their proxy adviser, Glass Lewis. Fulcrum will, in these instances, do their own research and if they consider it right to do so, vote against their advice if this is in advantage of the topic of climate change mitigation. In particular, Fulcrum looks for votes related to encouraging science-based target setting with regard to decarbonisation goals as this is a core part of their engagement focus. Glass Lewis' advice feeds automatically into the Broadridge platform where they execute the votes.	**Diversified Absolute Return** Number of meetings eligible to vote: 650 Number of resolutions eligible to vote: 14,609 Proportion of votes with management: 87% Proportion of votes against management: 12% Proportion of votes abstained: 1%

Manager	Manager proxy Voting Policy	Key votes undertaken over the year - 1 January 2023 to 31 December 2023
MAN	Man Group appointed Glass Lewis as its proxy service provider. MAN Group uses Glass Lewis's voting platform 'Viewpoint' to vote their shares electronically, receive research reports and custom voting recommendations. They have monitoring controls in place to ensure that the recommendations provided are in accordance with our ESG Voting Policy and that their votes are timely and effectively instructed. Specifically, their voting framework employs screening to identify high-value positions and the Stewardship Team manually reviews the pre-populated votes for such positions. In addition to this manual check, they also have in place electronic alerts to inform them of votes against their policy, votes that need manual input and rejected votes that require further action. MAN Group proxy voting framework comprises a bespoke screening system that identifies 'high-value meetings'. This screening combines the ESG rating from a third-party provider with an internal metric on deemed importance of the meeting. If a company falls below a certain threshold score in any area (ESG rating) and / or is considered materially important based on the % of shares outstanding held by Man or fund's AUM, the meeting will be flagged to the Stewardship Team and be considered 'high-value'. In addition to this, all meetings with shareholder proposals are also flagged to the Stewardship Team and reviewed.	**Alternative Style Risk Premia** Number of meetings eligible to vote: 13 Number of resolutions eligible to vote:200 Proportion of votes with management:72% Proportion of votes against management: 29% Proportion of votes abstained: 0%

Appendix B – Examples of Significant Votes

The following table details examples of significant votes undertaken over the year, in the Manager's own words.

The Trustee has reviewed voting records from the managers in each of their priorities listed above (Climate, Governance, Environmental Impact and Human Rights). The votes listed below are advised as most significant as they not only cover the priority areas for the Plan but also have the largest holding size as a proportion of the relevant Funds.

Mandates where shareholder voting is not applicable are not included in the list below

DB Section

There were no mandates in operation during the year where shareholder voting was applicable

DB AVC Section

Fund	Manager	Company	Approx. Size of Holding as % of Fund at date of vote	Date of Vote	Resolution	How you voted	Outcome	Priority Area for GSK	Rationale for the voting decision	Trustee Comment
GSK Lifecycle Fund	LGIM	JPMorgan Chase & Co.	<1%	16/05/2023	Report on Climate Transition Plan Describing Efforts to Align Financing Activities with GHG Targets	Against Management – FOR. LGIM publicly communicates its vote instructions on its website	Did not pass	Climate Change	LGIM generally support resolutions that seek additional disclosures on how they aim to manage their financing activities in line with their published targets. LGIM believe detailed information on how a company intends to achieve the 2030 targets they have set and published to the market (the 'how' rather than the 'what', including activities	The Trustee views Climate Change as a significant priority area for the Scheme, and is supportive of better disclosures across all industries.

Fund	Manager	Company	Approx. Size of Holding as % of Fund at date of vote	Date of Vote	Resolution	How you voted	Outcome	Priority Area for GSK	Rationale for the voting decision	Trustee Comment
									and timelines) can further focus the board's attention on the steps and timeframe involved and provides assurance to stakeholders.	
GSK Global Equity Fund	**LGIM**	**Alphabet Inc.**	**1.0%**	**02/06/2023**	**Approve Recapitalisation Plan for all Stock to Have One-vote per Share**	**Against Management – FOR.** **LGIM publicly communicates its vote instructions on its website**	**Did not pass**	**Governance**	**A vote in favour was applied as LGIM expects companies to apply a one-share-one-vote standard.**	The Trustee believes that a one tiered voting system is an improvement on current practices.
GSK Overseas Equity Fund	**LGIM**	**Amazon.com, Inc.**	**1.4%**	**24/05/2023**	**Report on Median and Adjusted Gender/Racial Pay Gaps**	**Against Management – FOR.** **LGIM publicly communicates its vote instructions on its website**	**Did not pass**	**Human Rights**	**A vote in favour is applied as LGIM expects companies to disclose meaningful information on its gender pay gap and the initiatives it is applying to close any stated gap. This is an important disclosure so that investors can assess the progress of the company's diversity and inclusion initiatives. Board diversity is an engagement and voting issue, as we believe cognitive diversity in business – the bringing together of people of different ages, experiences, genders, ethnicities, sexual orientations,**	The Trustee believes that increased transparency is an improvement on current practices.

Fund	Manager	Company	Approx. Size of Holding as % of Fund at date of vote	Date of Vote	Resolution	How you voted	Outcome	Priority Area for GSK	Rationale for the voting decision	Trustee Comment
									and social and economic backgrounds – is a crucial step towards building a better company, economy and society.	
GSK UK Equity Index Fund	LGIM	Shell Plc	7.0%	23/05/2023	Approve the Shell Energy Transition Progress	Against Management – AGAINST. LGIM publicly communicates its vote instructions on its website.	Passed	Climate Change	A vote against is applied, though not without reservations. LGIM acknowledge the substantial progress made by the company in meeting its 2021 climate commitments and welcome the company's leadership in pursuing low carbon products. However, they remain concerned by the lack of disclosure surrounding future oil and gas production plans and targets associated with the upstream and downstream operations; both of these are key areas to demonstrate alignment with the 1.5C trajectory.	The Trustee views Climate Change as a significant priority area for the Scheme, and is supportive of better disclosures across all industries.
GSK Retirement Income Multi-Asset Fund	LGIM	Toyota Motor Corp.	<1%	14/06/2023	Amend Articles to Report on Corporate Climate Lobbying Aligned with Paris	Against Management – FOR. LGIM publicly communicates its vote instructions on its	Did not pass	Climate Change	LGIM views climate lobbying as a crucial part of enabling the transition to a net zero economy. A vote for this proposal is warranted as LGIM believes that companies should advocate for public policies that support global climate ambitions and not stall	The Trustee views Climate Change as a significant priority area for the Scheme, and is supportive of better disclosures across all industries.

Fund	Manager	Company	Approx. Size of Holding as % of Fund at date of vote	Date of Vote	Resolution	How you voted	Outcome	Priority Area for GSK	Rationale for the voting decision	Trustee Comment
					Agreement	website.			progress on a Paris-aligned regulatory environment. LGIM acknowledge the progress that Toyota Motor Corp has made in relation to its climate lobbying disclosure in recent years. However, they believe that additional transparency is necessary with regards to the process used by the company to assess how its direct and indirect lobbying activity aligns with its own climate ambitions, and what actions are taken when misalignment is identified. Furthermore, LGIM expect Toyota Motor Corp to improve its governance structure to oversee this climate lobbying review. They believe the company must also explain more clearly how its multi-pathway electrification strategy translates into meeting its decarbonisation targets, and how its climate lobbying practices are in keeping with this.	
GSK Shariah	HSBC	Microsoft Corporation	7.6%	07/12/2023	Advisory Vote to Ratify Named	Against Management – AGAINST.	Passed	Governance	HSBC consider the quantum of the total pay excessive, the vesting period is not sufficiently long and the performance measurement	The Trustee views remuneration strategy as a key priority for the Scheme, as appropriately remunerated Boards and teams are expected to run more

Fund	Manager	Company	Approx. Size of Holding as % of Fund at date of vote	Date of Vote	Resolution	How you voted	Outcome	Priority Area for GSK	Rationale for the voting decision	Trustee Comment
Fund					**Executive Officers' Compensation**	**HSBC did not communicate their thinking ahead of the AGM.**			**period is not sufficiently long.**	effective companies.
GSK Diversified Growth Fund	**LGIM**	**Tencent Holdings Limited**	**<1%**	**17/05/2023**	**Elect Jacobus Petrus (Koos) Bekker as Director**	**Against Management – AGAINST.** **LGIM publicly communicates its vote instructions on its website.**	**Passed**	**Climate Change**	**Climate Impact Pledge: A vote against is applied as the company is deemed to not meet minimum standards with regard to climate risk management. Remuneration Committee: A vote against has been applied because LGIM expects the Committee to comprise independent directors.**	The Trustee views Climate Change as a significant priority area for the Scheme, and is supportive of better disclosures across all industries.
GSK Global Sustainable Equity	**LGIM**	**Mastercard Inc.**	**<1%**	**27/06/2023**	**Elect Director Merit E. Janow**	**With Management – FOR.** **LGIM publicly communicates its vote instructions on its website.**	**Passed**	**Governance**	**A vote in favour was applied as no significant concerns were highlighted. While LGIM note the dual-class share structure with A and B shares outstanding, the Company has confirmed that the legacy B shares do not confer any rights and therefore do not negatively affect the rights attached to the commonly traded A shares.**	The Trustee views good governance (including sensible Board composition, with appropriate risk management) as key to good stewardship and ultimately Company performance

Given the size of the holdings, most of the significant votes that have been identified above have been managed by LGIM over the year. Therefore, we have also shown significant votes from other managers below:

SmithKline Beecham Senior Executive Pension Plan
IMPLEMENTATION STATEMENT
Year ended 31 DECEMBER 2023

Manager	Fund	Company	Approx. Size of Holding as % of Fund at date of vote	Date of Vote	Resolution	How you voted	Outcome	Priority Area for GSK	Rationale for the voting decision	Trustee Comment
Nordea	**Diversified Return**	**Mastercard Inc.**	**1.5%**	**27/06/2023**	**Political Lobbying Disclosure (shareholder proposal)**	**Against Management – FOR.** **Nordea will share their concern with the Chairman of the Board.**	**Did not pass**	**Governance**	**Nordea voted for the shareholder proposal as they believe additional disclosure of the company's direct and indirect lobbying-related expenditures would help shareholders better assess the risks and benefits associated with the company's participation in the public policy process.**	The Trustee views Governance as a significant area for the Scheme and is supportive of increased disclosures in relation to industry risk processes.
Fulcrum	**Diversified Absolute Return**	**Rio Tinto plc**	**<1%**	**27/3/2023**	**Report on Risks of Operating in Countries with Significant Human Rights Concerns**	**Against Management – FOR.** **Fulcrum did not inform management of their voting intention prior to the vote.**	**Passed**	**Climate Change**	**Glass Lewis have certain reservations concerning proposals that request shareholders approve or disapprove a company's climate strategy. However, having reviewed the circumstances at the Company, they believed that shareholder support for this proposal was warranted. Additionally, the Company provides information concerning its response if the vote receives significant opposition. Namely, the Company states that if the "resolution receives less than 50% in favour, it would hold specific discussions with shareholders and seek**	The Trustee views Climate Change as a significant priority area for the Scheme, and is supportive of disclosures across all industries.

									information from them about why they did not support the proposed CAP, inform all shareholders about the results of that process and announce its intended measures aimed at taking them into account." We agree with Glass Lewis's rationale to encourage such engagement with all shareholders and hence support their proposal to vote FOR the proposal.	
MAN	**Alternative Style Risk Premia**	**Arch Capital Group Ltd**	**<1%**	**04/05/2023**	**Elect Francis Ebong**	**Against Management – AGAINST.** **MAN did not inform management of their voting intention prior to the vote.**	**Passed**	**Human Rights**	**Insufficient gender diversity.**	The Trustee sees gender equality as an important issue and engaging with the Company on this is key. It also sees Board Composition (including diversity) as key to the good stewardship of a Company.

Appendix C – Benchmark and Target Allocations

DB Section

Given the Buy-in, there are no longer benchmark and target allocations in operation for the DB Section of the Plan.

DB AVC Section

Fund	Underlying Fund		Benchmark	Fund Type
Lifecycle Fund	65.0%	GSK Global Equity Index	3.0% FTSE All Share Index / 3.0% Solactive L&G ESG UK Index / 17.5% FTSE AW - World (Ex-UK) / 17.5% Solactive L&G ESG Developed (Ex-UK) Index / 22.0% FTSE AW - World (Ex-UK) – GBP Hedged / 22.0% Solactive L&G ESG Developed (Ex-UK) Index GBP Hedged / 5.0% FTSE AW – All Emerging Markets / 5.0% Solactive L&G ESG Emerging Markets Index / 5.0% FTSE Global Developed Small Cap Index	Active & Passive
	35.0%	GSK Diversified Growth	Benchmark – Sterling Overnight Index Average (SONIA) Target – SONIA +3.5% (net of fees)	
UK Equity Index	100.0%	LGIM - UK Equity Index	FTSE All-Share Index	Passive
Global Equity Index	3.0%	LGIM - UK Equity Index	FTSE All-Share Index	Passive
	3.0%	LGIM – Future World UK Equity Index	Solactive L&G ESG UK Index	
	94.0%	GSK Overseas Equity Index	See below	
Overseas Equity Index	23.4%	LGIM - World (ex-UK) Developed Equity Index	18.6% FTSE AW - World (Ex-UK) / 18.6% Solactive L&G ESG Developed (Ex-UK) Index / 23.4% FTSE AW - World (Ex-UK) – GBP Hedged / 23.4% Solactive L&G ESG Developed (Ex-UK) Index GBP Hedged / 5.3% FTSE AW – All Emerging Markets / 5.3% Solactive L&G ESG Emerging Markets Index / 5.3% FTSE Global Developed Small Cap Index	Passive
	23.4%	LGIM Future World Developed (ex UK) Equity Index Fund – GBP Hedged		
	18.6%	LGIM - World (ex-UK) Developed Equity Index (Currency Hedged)		
	18.6%	LGIM Future World Developed (ex UK) Equity Index Fund		
	5.3%	LGIM - World Emerging Markets Equity Index		
	5.3%	LGIM Future World Emerging Markets Equity Index Fund		
	5.3%	LGIM – Global Developed Small Cap Index Fund		
Diversified Growth	28.6%	LGIM - Diversified Return	Benchmark – SONIA Target – SONIA +3.5% (net of fees)	Active
	28.6%	Nordea - Diversified Return		Active
	21.4%	Fulcrum – Diversified Absolute Return		Active
	21.4%	Man Group – Alternative Style Risk Premia		Active
Pre-Retirement Inflation Linked	100.0%	LGIM - Pre-Retirement Inflation-Linked	Currently there is no formal benchmark for this Fund	Passive
Retirement Income Multi-Asset	100.0%	LGIM - Retirement Income Multi-Asset	Bank of England Base Rate +3.5% p.a.	Active

Shariah	100.0%	HSBC - Shariah	Dow Jones Islamic Titans 100 Index	Passive
Cash	100.0%	LGIM - Sterling Liquidity	SONIA	Active
Global Sustainable Equity	46.0%	LGIM Future World Developed (ex UK) Equity Index Fund	6% Solactive L&G ESG UK Index / 37% Solactive L&G ESG Developed (Ex-UK) Index / 46% Solactive L&G ESG Developed (Ex-UK) Index GBP Hedged / 11% Solactive L&G ESG Emerging Markets Index	Passive
	37.0%	LGIM Future World Developed (ex UK) Equity Index Fund		
	11.0%	LGIM Future World Emerging Markets Equity Index Fund		
	6.0%	LGIM Future World UK Equity Index		