

Engagement Policy Implementation Statement ("EPIS")

Monsanto Pension Plan (the "Plan") Year End – 31 December 2024

The purpose of the EPIS is for us, the Trustee of the Monsanto Pension Plan, to explain what we have done during the year ending 31 December 2024 to achieve certain policies and objectives set out in the Statement of Investment Principles ("SIP"). It includes:

1. How our policies in the SIP about asset stewardship (including both voting and engagement activity) in relation to the Plan's investments have been followed during the year; and
2. How we have exercised our voting rights or how these rights have been exercised on our behalf, including the use of any proxy voting advisory services, and the 'most significant' votes cast over the reporting year.

This statement has been produced in accordance with the Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018, the subsequent amendment in The Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019 and the statutory guidance on reporting on stewardship in the implementation statement dated 17 June 2022.

The statement is based on, and should be read in conjunction with, the SIP dated August 2023. After the Plan year end, the SIP was updated to reflect the de-risking changes made to the investment strategy, as well as the Trustee's responsible investment beliefs and ESG engagement priorities.

A copy of the SIP containing the stewardship policy is available at:

<https://monsanto.pensions-directory.co.uk/>.

Our conclusion

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

In our view, the Plan's investment managers Legal and General Investment Management ("LGIM") and Insight Investment ("Insight") were able to disclose good evidence of voting and engagement activity, and the activities completed by our managers align with our stewardship expectations.

How voting and engagement policies have been followed

The Plan is invested in pooled funds and a segregated portfolio, and so the responsibility for voting and engagement is delegated to the Plan's investment managers. We reviewed the stewardship activity LGIM and Insight carried out over the Plan year and in our view, they were able to disclose good evidence of voting and/or engagement activity. More information on the stewardship activity carried out by the Plan's investment managers can be found in the following sections of this report.

Responsible Investment Updates

Over the Plan year we undertook a review of our responsible investment beliefs, with support from our investment advisor, Mercer Limited ("Mercer"). Following this review, the responsible investment beliefs outlined in the Statement of Investment Principles were updated to reflect the views of the current Trustee, as well as the new ESG engagement priorities.

Ongoing Monitoring

Over the reporting year, we monitored the performance of the Plan's investments on a quarterly basis and received updates on important issues from our investment advisor. In particular, we received ESG ratings from the investment advisor for the funds in which the Plan is invested, where available.

Cost Transparency

On an annual basis, we complete the ClearGlass process allowing the costs incurred by the Plan over the year to be collated and categorised. The process uses an industry standard template which ensures greater transparency in the reporting of costs. This allows us to identify 'hidden costs' not included in the annual management charge and also determine any areas of concern.

Scottish Widows

Scottish Widows are the Plan's selected bulk annuity provider. We consider that Scottish Widows' approach to stewardship is relevant, whilst there is limited capacity to engage with the provider to influence its policies on an ongoing basis. We note that Scottish Widows have made disclosures under TCFD and completed the accompanying climate scenario analysis, however, there was limited evidence of investment decisions resulting from the analysis. Scottish Widows is a UK Stewardship Code signatory and remains a signatory to the Principles for Responsible Investment (PRI), which is a global initiative to promote best practice within Responsible Investment.

What is stewardship?

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

This includes prioritising which Environmental Social Governance ("ESG") issues to focus on, engaging with investees/issuers, and exercising voting rights.

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

Source: UN PRI.

Our managers' voting activity

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

Voting rights are attached to listed equity shares, including equities held in multi-asset funds. We expect the Plan's equity-owning investment manager to responsibly exercise its voting rights. Insight's LDI and LGIM's Segregated Buy and Maintain mandates have no investments with voting rights and is therefore excluded from this analysis.

Why is voting important?

Voting is an essential tool for listed equity investors to communicate their views to a company and input into key business decisions. Resolutions proposed by shareholders increasingly relate to social and environmental issues.

Source: UN PRI.

Voting statistics

The table below shows the voting statistics for the Plan's material fund with voting rights for the year to 31 December 2024.

Funds	Number of resolutions eligible to vote on	% of resolutions voted	% of votes against management	% of votes abstained from
LGIM - Developed Balanced Factor Equity Index Fund (Hedged and Unhedged)	11,565	99.6%	20.8%	0.4%

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

Use of proxy voting advisers

Many investment managers use proxy voting advisers to help them fulfil their stewardship duties. Proxy voting advisers provide recommendations to institutional investors on how to vote at shareholder meetings on issues such as climate change, executive pay and board composition. They can also provide voting execution, research, record keeping and other services.

Responsible investors will dedicate time and resources towards making their own informed decisions, rather than solely relying on their adviser's recommendations.

The table below describes how the **Error! Reference source not found.**'s manager uses proxy voting advisers.

Why use a proxy voting adviser?

Outsourcing voting activities to proxy advisers enables managers that invest in thousands of companies to participate in many more votes than they would without their support.

Managers	Description of use of proxy voting adviser(s) (in the manager's own words)
Legal & General Investment Management ("LGIM")	LGIM's Investment Stewardship team uses the Institutional Shareholder Services ("ISS") 'ProxyExchange' electronic voting platform to electronically vote on behalf of clients' shares. All voting decisions are made by LGIM, and we do not outsource any part of the strategic decisions. To ensure our proxy provider votes in accordance with our position on ESG, we have put in place a custom voting policy with specific voting instructions.

Source: LGIM

Significant voting examples

To illustrate the voting activity being carried out on our behalf, we asked the Plan's investment managers that hold investments with voting rights to provide a selection of what they consider to be the most significant votes in relation to the Plan's investments.

The Trustee defines a significant vote as one that is linked to the Plan's stewardship priorities/themes of Size, Environment and Governance:

- Size: votes in relation to any of the portfolio's 10 largest holdings.
- Climate Change: e.g. a vote requiring publication of a business strategy aligned with the Paris Agreement, or resolutions on climate related activities that would result in significant biodiversity loss.
- Broad governance including D&I e.g. votes on proposals that would be at odds with the expectations of the UK Corporate Governance Code (i.e. matters of excessive or inappropriate executive remuneration or lack of board diversity).

A sample of the significant votes can be found in the appendix.

Our managers' engagement activity

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

The table below shows some of the engagement activity carried out by LGIM and Insight. The managers have provided information for the most recent calendar year available. Some of the information provided is at a firm-level, i.e. is not necessarily specific to the funds invested in by the Plan.

Funds	Number of engagements		Themes engaged on at a fund / firm level
	Fund level	Firm level	
LGIM - Buy and Maintain	145	Not provided	Environment - Climate Change; Climate Impact Pledge; Plastic Waste; Pollution; Green and Sustainability-linked Bonds; Energy Governance - Mergers and Acquisitions; Remuneration; Capital Management; Board Composition; Nominations and succession; Governance of Technology Social - Human Rights; Gender and Ethnic Diversity; Income inequality; Supply Chain
LGIM - Developed Balanced Factor Equity Index Fund (Hedged and Unhedged)	682	Not provided	Environment - Climate Change; Climate Impact Pledge; Plastic Waste; Circular Economy; Climate Mitigation; Biodiversity Governance - Mergers and Acquisitions; Remuneration; Capital Management; Board Composition; Nominations and succession; Governance of Technology Social - Human Rights; Gender and Ethnic Diversity; Income inequality; Supply Chain; Public Health; Antimicrobial Resistance
Insight – LDI ¹	Not provided	991	Climate Change; Natural Capital and Biodiversity; Labour Management

Source: Managers.

¹Data for the one-year period to 31 December 2024

Data limitations

At the time of writing, LGIM provided fund level engagement information but not in the industry standard template. This report does not include commentary on certain asset classes such as gilts or cash because of the limited materiality of stewardship to these asset classes.

Appendix – Significant Voting Examples

In the table below are significant vote examples provided by LGIM. A significant vote is one of the portfolio's 10 largest holdings that relates to the Plan's stewardship priorities.

LGIM – Dev Bal Factor Equity (Hedged and Unhedged)

Company name	Boston Scientific Corporation
Date of vote	2 May 2024
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	0.8
Summary of the resolution	Resolution 1d: Elect Director Michael F. Mahoney
How you voted?	Vote against resolution
Where you voted against management, did you communicate your intent to the company ahead of the vote?	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is their policy not to engage with their investee companies in the three weeks prior to an AGM as their engagement is not limited to shareholder meeting topics.
Rationale for the voting decision	A vote against is applied as LGIM expects companies to separate the roles of Chair and CEO due to risk management and oversight concerns.
Outcome of the vote	Pass
Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	LGIM will continue to engage with their investee companies, publicly advocate their position on this issue and monitor company and market-level progress.
On which criteria have you assessed this vote to be most significant?	Stewardship priority – Broad Governance

Company name	Alphabet Inc.
Date of vote	7 June 2024
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	0.8
Summary of the resolution	Resolution 18 - Resolution 1d: Elect Director John L. Hennessy
How you voted?	Vote against resolution
Where you voted against management, did you communicate your intent to the company ahead of the vote?	<p>LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is their policy not to engage with their investee companies in the three weeks prior to an AGM as their engagement is not limited to shareholder meeting topics.</p>
Rationale for the voting decision	<p>A vote against is applied as:</p> <ul style="list-style-type: none"> - LGIM expects a board to be regularly refreshed in order to maintain an appropriate mix of independence, relevant skills, experience, tenure, and background. - LGIM expects a company to have at least one-third women on the board. - LGIM expects the Chair of the Committee and the Chair of the Board to have served on the board for no more than 15 years in order to maintain independence and a balance of relevant skills, experience, tenure, and background. - LGIM supports the equitable structure of one-share-one-vote. LGIM expects companies to move to a one-share-one-vote structure or provide shareholders a regular vote on the continuation of an unequal capital structure.
Outcome of the vote	Pass
Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	LGIM will continue to engage with their investee companies, publicly advocate their position on this issue and monitor company and market-level progress.
On which criteria have you assessed this vote to be most significant?	Stewardship priority – Broad Governance

Company name	T-Mobile US, Inc.
Date of vote	12 June 2024
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	0.7
Summary of the resolution	Resolution 1.13: Elect Director Teresa A. Taylor
How you voted?	Vote against resolution
Where you voted against management, did you communicate your intent to the company ahead of the vote?	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is their policy not to engage with their investee companies in the three weeks prior to an AGM as their engagement is not limited to shareholder meeting topics.
Rationale for the voting decision	A vote against the director responsible for board-level diversity is applied as LGIM expects a company to have at least one-third women on the board.
Outcome of the vote	Pass
Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	LGIM will continue to engage with their investee companies, publicly advocate their position on this issue and monitor company and market-level progress.
On which criteria have you assessed this vote to be most significant?	Stewardship priority – Broad Governance

Company name	The Travelers Companies, Inc.
Date of vote	15 May 2024
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	0.7
Summary of the resolution	Resolution 1h: Elect Director Alan D. Schnitzer
How you voted?	Vote against resolution
Where you voted against management, did you communicate your intent to the company ahead of the vote?	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is their policy not to engage with their investee companies in the three weeks prior to an AGM as their engagement is not limited to shareholder meeting topics.
Rationale for the voting decision	A vote against is applied as LGIM expects companies to separate the roles of Chair and CEO due to risk management and oversight concerns.
Outcome of the vote	Pass
Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	LGIM will continue to engage with their investee companies, publicly advocate their position on this issue and monitor company and market-level progress.
On which criteria have you assessed this vote to be most significant?	Stewardship priority – Broad Governance
Company name	Meta Platforms, Inc.
Date of vote	29 May 2024
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	0.7
Summary of the resolution	Resolution 1.1: Elect Director Peggy Alford
How you voted?	Vote against resolution
Where you voted against management, did you communicate your intent to the company ahead of the vote?	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is their policy not to engage with their investee companies in the three weeks prior to an AGM as their engagement is not limited to shareholder meeting topics
Rationale for the voting decision	<p>A vote against is applied because:</p> <ul style="list-style-type: none"> - LGIM expects companies to elect an independent lead director where there is a combined Board Chair and CEO. - LGIM expects companies to obtain annual shareholder approval of executive directors pay and non-executive directors fees. - LGIM expects all incentives to be subject to clawback if the vested award is later deemed to be unjustified.

Rationale for the voting decision	<p>A vote against is applied because:</p> <ul style="list-style-type: none"> - The company does not have a shareholding guideline in place for executives. LGIM believes a shareholding requirement is a good way to align with long term shareholder interests because executives are expected to maintain a proportion of earned shares at risk over the medium term. - LGIM expects a sufficient portion of share incentive awards to be assessed against long term performance conditions to ensure alignment of remuneration with company performance. - LGIM expects performance to be measured over a three-year period. - A WITHHOLD vote is further warranted for Peggy Alford in her capacity as chair of the compensation, nominating, & governance committee due to consecutive years of high director pay without reasonable rationale disclosed.
Outcome of the vote	Pass
Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	LGIM will continue to engage with their investee companies, publicly advocate their position on this issue and monitor company and market-level progress.
On which criteria have you assessed this vote to be most significant?	Stewardship priority – Broad Governance
Company name	Trane Technologies Plc
Date of vote	6 June 2024
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	0.7
Summary of the resolution	Resolution 1j: Elect Director David S. Regnery
How you voted?	Vote against resolution
Where you voted against management, did you communicate your intent to the company ahead of the vote?	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is their policy not to engage with their investee companies in the three weeks prior to an AGM as their engagement is not limited to shareholder meeting topics
Rationale for the voting decision	A vote against is applied as LGIM expects companies to separate the roles of Chair and CEO due to risk management and oversight concerns.
Outcome of the vote	Pass
Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	LGIM will continue to engage with their investee companies, publicly advocate their position on this issue and monitor company and market-level progress.
On which criteria have you assessed this vote to be most significant?	Stewardship priority – Broad Governance

Company name	Costco Wholesale Corporation
Date of vote	18 January 2024
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	0.7
Summary of the resolution	Elect Director Jeffrey S. Raikes
How you voted?	Vote against resolution
Where you voted against management, did you communicate your intent to the company ahead of the vote?	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is their policy not to engage with their investee companies in the three weeks prior to an AGM as their engagement is not limited to shareholder meeting topics
Rationale for the voting decision	A vote against is applied as LGIM expects a board to be regularly refreshed in order to maintain an appropriate mix of independence, relevant skills, experience, tenure, and background. Also, LGIM expects the Chair of the Committee to have served on the board for no more than 15 years in order to maintain independence and a balance of relevant skills, experience, tenure, and background.
Outcome of the vote	Pass
Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	LGIM will continue to engage with their investee companies, publicly advocate their position on this issue and monitor company and market-level progress.
On which criteria have you assessed this vote to be most significant?	Stewardship priority – Broad Governance

Company name	Chubb Limited
Date of vote	16 May 2024
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	0.7
Summary of the resolution	Resolution 5.11: Elect Director David H. Sidwell
How you voted?	Vote against resolution
Where you voted against management, did you communicate your intent to the company ahead of the vote?	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is their policy not to engage with their investee companies in the three weeks prior to an AGM as their engagement is not limited to shareholder meeting topics
Rationale for the voting decision	A vote against the chair of the Nomination & Governance committee is applied as LGIM expects a company to have at least one-third women on the board.
Outcome of the vote	Pass
Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	LGIM will continue to engage with their investee companies, publicly advocate their position on this issue and monitor company and market-level progress.
On which criteria have you assessed this vote to be most significant?	Stewardship priority – Broad Governance
Company name	The Allstate Corporation
Date of vote	14 May 2024
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	0.7
Summary of the resolution	Resolution 1m: Elect Director Thomas J. Wilson
How you voted?	Vote against resolution
Where you voted against management, did you communicate your intent to the company ahead of the vote?	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is their policy not to engage with their investee companies in the three weeks prior to an AGM as their engagement is not limited to shareholder meeting topics
Rationale for the voting decision	A vote against is applied as LGIM expects companies to separate the roles of Chair and CEO due to risk management and oversight concerns.
Outcome of the vote	Pass
Implications of the outcome e.g. were there any lessons learned and what likely future steps will you take in response to the outcome?	LGIM will continue to engage with their investee companies, publicly advocate their position on this issue and monitor company and market-level progress.
On which criteria have you assessed this vote to be most significant?	Stewardship priority – Broad Governance

Source: LGIM.