

Shaw Group UK 1997 Pension Scheme (the “Scheme”) Implementation Statement for the year ended 31 December 2023

Purpose

This Implementation Statement provides information on how, and the extent to which, the Trustee of the Shaw Group UK 1997 Pension Scheme (“the Scheme”) has followed its policy in relation to the exercising of rights (including voting rights) attached to the Scheme’s investments, and engagement activities during the year ended 31 December 2023 (“the reporting year”). In addition, the statement provides a summary of the voting behaviour and most significant votes cast during the reporting year.

Background

In July 2023 having considered advice from the Investment Adviser, and having due regard for the objectives, the liabilities of the Scheme, the risks of and to the Scheme and the covenant of the Firm, the Trustee has decided that the investment objectives are best achieved by investing in a buy-in policy with Legal & General (“L&G”). The Trustee will use the Scheme’s bank account and an institutional cash fund held via a life policy with Legal & General Investment Management (‘LGIM’) to store any additional monies. The Statement of Investment Principles has been updated to reflect this change in strategy.

The Trustee’s updated policy

The Trustee believes that there can be financially material risks relating to ESG issues. Given the arrangement in place L&G will be responsible for the ongoing monitoring and management of ESG risks. The Trustee expects L&G to consider ESG risks within their decision-making, recognising that how they do this will be dependent on the characteristics of the asset classes in which they invest.

As the Scheme invests with an Insurance Provider in a buy-in policy, the Trustee acknowledges that they cannot directly influence the policies and practices of the companies in which the Insurance Provider invests. The Trustee does not hold any funds with voting rights, and do not expect to in the future given the buy-in policy and expected move towards buy-out.

Adherence to the Statement of Investment Principles

During the reporting year the Trustee is satisfied that they followed their policy on the exercise of rights (including voting rights) and engagement activities to an acceptable degree.

Voting activity

Due to the investment strategy in place, the only fund the Scheme is invested in is an institutional cash fund. This fund does not have any voting rights and therefore no voting is available for the Scheme’s assets.

Signed: _____, Chair of Trustees

Date: _____