

Engagement Policy Implementation Statement for the Year Ended 31 March 2026

Roche Pension Fund (“the Fund”)

1. INTRODUCTION

The Engagement Policy Implementation Statement (the “Statement”) presents the Trustee’s assessment of their adherence to their engagement policy and their policy concerning the exercise of rights (including voting rights) attaching to the Fund’s investments throughout the one-year period ending 31 March 2026 (the “Fund Year”). The Trustee policies are outlined in their Statement of Investment Principles (SIP). The SIP was last reviewed in June 2025 in order to reflect the Trustee’s decision to change the long term investment objective target to 105% funded on a gilts +0.5% p.a. by the period 31 March 2030 to 31 March 2038. This resulted in a change to the investment strategy with the objective of generating a return over the long term of gilts +1.8% p.a. (net of investment manager fees) which saw the Fund increase the allocation to growth assets and diversify the credit portfolio. A copy of the Trustee’s SIP is available at <https://www.rochepensionfund.co.uk/>.

This Statement has been prepared in accordance with the *Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019* and the guidance published by the Department for Work and Pensions.

The Trustee has appointed Mercer Limited (Mercer) as the discretionary investment manager and the Fund assets are invested in a diverse range of specialised pooled funds and a segregated LDI portfolio. The pooled funds are managed by Mercer, M&G and TwentyFour Asset Management. The management of the Mercer Funds is carried out by a Mercer affiliate, namely Mercer Global Investments Europe Limited (MGIE) and Mercer Investments LLC (PIP III) and Mercer Alternatives (Luxembourg) S.à r.l. thereafter. The Fund also has investments with BlackRock Investment Management (“BlackRock”) via a segregated Liability Driven Investment (“LDI”) portfolio and UK Property Fund. The Fund’s legacy holding in within Alinda Capital Partners (“Alinda”) via the Alinda Infrastructure Parallel Fund was liquidated during the year and the Trustee agreed to sell the Fund’s holdings in the BlackRock UK Property Fund via the secondary market. The majority of this document relates to the Fund’s assets held with MGIE (given the nature of the assets held) unless otherwise stated. Due to the nature of the private market investments, Asset Backed Securities (“ABS”) Funds and the BlackRock segregated LDI portfolio, voting information is not available for these assets.

The relevant Mercer affiliate is responsible for the appointment and monitoring of a suitably diversified portfolio of specialist third party investment managers for the assets of each Mercer Fund.

Under these arrangements, the Trustee acknowledges that they does not possess direct authority over the engagement or voting policies and arrangements of the Mercer Funds’ managers. Mercer’s publicly available [Sustainability Policy](#) outlines Mercer’s investment philosophy and approach to managing sustainability risks and opportunities. The [Stewardship Policy](#) provides further details on Mercer’s stewardship practices.

Mercer’s triennial Client Engagement Survey seeks to incorporate the Trustee perspectives by assessing the alignment between Mercer’s engagement priorities and those of the Trustee. The most recent survey, conducted in 2023, identified key focus areas important to the Trustee. The Trustee also regularly review Mercer’s reports on stewardship activities, including engagement and voting, to ensure these align with their own expectations.

Section 2 of this Statement outlines the Trustee’s engagement policy and evaluates the extent to which it has been followed during the Fund Year.

Section 3 sets out the Trustee’s policy regarding the exercising of rights (including voting rights) attached to the Fund investments. This Section also provides detailed information on the voting activities undertaken by third-party investment managers appointed within the Mercer Funds during the Fund Year.

Considering the analysis presented in Sections 2 to 3, the Trustee believes that their policies with regard to engagement and the exercise of rights attaching to investments have been successfully followed during the Fund Year.

2. TRUSTEE'S POLICY ON ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (ESG) ISSUES, INCLUDING CLIMATE CHANGE

Policy Summary

The Trustee ESG policy is outlined in Section 3 of the Fund's SIP.

The Trustee regularly reviews Stewardship and Sustainability policies as noted above. If the Trustee finds that the relevant policies of Mercer, MGIE or the third-party asset managers does not align with their own beliefs they will notify Mercer. Engagement to seek alignment will be prioritised, then they may consider disinvesting some or all of the assets held in the Mercer Funds. They may also seek to renegotiate commercial terms with Mercer.

The Pension Schemes Act 2021 introduced legislation requiring specified pension schemes to have effective governance, strategy, risk management, and accompanying metrics and targets for the assessment and management of climate risks and opportunities. This requirement is aligned with the Task Force on Climate-related Disclosures (TCFD) framework. The TCFD framework is a set of recommendations developed by an international task force established by the Financial Stability Board (FSB). The framework provides guidance for organizations to disclose climate-related financial information in a consistent and decision-useful manner. Occupational pension schemes with £5 billion or more in assets must comply with these requirements from 1 October 2021. Occupational pension schemes with £1 billion or more in assets must comply with these requirements from 1 October 2022.

The Trustee maintains an ESG Policy Document which is reviewed annually, and the Investment Sub-Committee ("ISC") consider the requirements of TCFD reporting and how they impact the Fund.

How the Policy has been implemented over the Fund Year

The following work was undertaken during the year relating to the Trustee policy on sustainability integration, including the climate transition and effective stewardship.

Policy Updates	Climate Change Reporting and Carbon Foot printing	Mercer ESG Framework
The Trustee regularly reviews how sustainability considerations including the climate transition and effective stewardship are integrated within Mercer's, and MGIE's, investment processes and those of the underlying asset managers within the Mercer Funds, in their monitoring process. Mercer, and MGIE, provide reporting to the Trustee on a regular basis. The Mercer Sustainability Policy and Stewardship Policy are reviewed regularly. The policies now include nature and biodiversity as key themes and include expanded details on Mercer's Investment Philosophy. Mercer also regularly reviews its approach to integrating climate considerations into its investment decision-making process as	Mercer's global investment philosophy, which the Trustee has reviewed, recognises that: - Portfolio resilience can be enhanced by integrating financially material sustainability, transition, and socioeconomic risks into investment decision-making. - Investing to solve long-term systemic issues may provide opportunities to improve risk-adjusted returns. - Effective stewardship can improve investment outcomes. Mercer applies each of these three lenses when considering the climate transition, a widely recognised systemic risk. Mercer considers the transition to a low carbon economy, and the physical damages associated with global temperature increases, through its Climate Transition (ACT) framework. This framework assesses portfolio alignment with low-carbon goals and monitors various climate-related metrics.	Mercer's new ESG relevance highlights to what degree ESG factors have the potential to influence Mercer's view of strategies in that asset class, based on the typical impact of ESG Factors on the underlying securities as well as risk return drivers in a portfolio. Each relevant strategy has a binary ESG Indication. A strategy is considered Integrated if Mercer believes there is consistency and repeatability in the manager's approach to identifying and assessing material financial ESG risks into their due diligence and investment decisions. Stewardship continues to form an important part of Mercer's ESG framework, applied during the manager research process.

documented in its [Task Force on Climate Related Financial Disclosures \(TCFD\) report](#).

The most recent [UN Principles of Responsible Investment](#) results (based on 2022 activity) awarded Mercer with 4 out of 5 stars for Policy Governance and Strategy.

Mercer is a member of the TNFD working group and a founding signatory of Nature Action 100. The Financial Reporting Council confirmed in January 2026 that MGIE will remain a signatory to the UK Stewardship Code, based on its application of the 12 principles, which is seen to represent best practice in stewardship.

Mercer has a target of net-zero absolute portfolio carbon emissions by 2050 for UK, European and Asian discretionary portfolios, and relevant multi-client, multi-asset funds domiciled in Ireland. To achieve this, Mercer has set a target to reduce portfolio carbon intensity by 45% from 2019 levels and is on track to meet this goal. Mercer's climate risk management is consistent with the framework recommended by the Financial Stability Board's Task Force on Climate related Financial Disclosures (TCFD), as described in Mercer's latest Task Force on Climate Related Financial Disclosures Status [Report](#).

As of 31 March 2026, Mercer's in-scope portfolios are on track to meet their long-term net zero portfolio carbon emissions reduction targets, with an average of -58% since baseline. (Data Source: MSCI Barra)

From Q2 2025 onwards this new integration framework is included in the investment performance reports produced by Mercer on a quarterly basis and reviewed by the Trustee.

Approach to Exclusions	Sustainability-themed investments	Diversity
Mercer and MGIE prioritize integration and stewardship, but may exclude certain investments based on Mercer's Exclusions Frameworks. Controversial weapons and civilian firearms are excluded from all multi-client funds, while tobacco and nuclear weapons are excluded from active equity and fixed income funds. Additional exclusions are detailed in fund disclosures on Mercer's website. In addition, Mercer and MGIE monitor funds for high-severity incidences relating to the UN Global Compact (UNGC) Principles that relate to human rights, labour, environmental and corruption issues.	An allocation to MGIE's Mercer Passive Sustainable Global Equity UCITS CCF and Mercer's Sustainable Opportunities Fund – PIP IV (private markets) is included within the Fund portfolio of Growth assets, with the allocation accounting for c.6% of the Growth Portfolio.	Mercer and the Trustee believes that diverse teams enhance decision-making. As a result, they have implemented several measures to promote diversity within Mercer's portfolio management team, the appointed managers, and across portfolio holdings. Participation in collaborative initiatives can also support raising awareness and contributing to initiatives across the broader industry. Mercer Limited is a member of The Diversity Project, which seeks to accelerate progress towards a more inclusive culture in the investment and savings profession. Mercer is also a member of the 30% Club – UK Investor Chapter and Irish Investor Chapter, which are investor-led initiatives focused on increasing gender diversity on corporate boards and in senior leadership roles. While Mercer considers various forms of diversity in decision-making, it currently reports specifically on gender diversity.

Engagement

Engagement is an important aspect of Mercer's stewardship activities on behalf of the Trustee. [The 2025 Sustainability & Stewardship Report](#) captures Mercer's stewardship approach, activities and outcomes over the calendar year 2024 and is designed to address the 12 principles of the 2020 UK Stewardship Code for investment managers.

Mercer conducts an annual survey on sustainability and stewardship topics. The survey was distributed to over 200 managers appointed in the Mercer Funds. The survey gathers information on managers' broad approach to stewardship as part of their investment integration. It also seeks insights and examples of voting and engagement activities. The results

from the survey serve as an important source of information for tracking and measuring managers' stewardship efforts, assessing effectiveness, and identifying potential areas for improvement.

The results and insights from the survey will be shared in Mercer's annual Sustainability and Stewardship Report and a distinct Highlights report. These reports are reviewed by the Trustee providing them with valuable information on the managers' stewardship activities and their alignment with Mercer's objectives.

3. TRUSTEE'S POLICY ON EXERCISE OF RIGHTS (INCLUDING VOTING RIGHTS) ATTACHING TO FUND INVESTMENTS

The Trustee policy is as follows:

Delegation of Investment Management:

- The Trustee delegates responsibility for the discretionary investment management of Fund assets to Mercer. The Fund assets are invested in a range of Mercer Funds for which MGIE or relevant Mercer affiliate acts as investment manager.

Reporting of Engagement and Voting activities

- For the Trustee to fulfil their obligations regarding voting and engagement, they require reporting on the engagement and voting activities undertaken within the Mercer Funds. This reporting helps the Trustee assess whether the policies align with their own delegation of voting rights.
- Voting rights that apply to the underlying investments attached to the Mercer Funds are delegated to the third-party investment managers appointed by MGIE. MGIE accepts that these managers are typically best placed to exercise voting rights and prioritise particular engagement topics, given their detailed knowledge of the governance and operations of the investee companies. However, Mercer plays a pivotal role in monitoring the stewardship activities of those managers and promoting more effective stewardship practices, including attention to more strategic themes and topics.

Proxy Voting Responsibility:

- Proxy voting responsibility is given to listed equity investment managers with the expectation that all shares are voted⁽²⁾ in a timely manner and in a manner deemed most likely to protect and enhance long-term value.
- Mercer and MGIE carefully evaluate each investment manager's stewardship capabilities (engagement and voting activities) as part of the selection process, ensuring alignment with Mercer's commitment to good governance and the integration of sustainability considerations. Managers are expected to take account of current best practice such as the UK Stewardship Code, to which Mercer is a signatory. As such the Trustee does not use the direct services of a proxy voter.

A summary of the voting activity for a range of Mercer Funds in which the Fund assets are invested in is provided for the year ending 31 March 2026. This may include information in relation to funds that the Scheme's assets were no longer invested in at the year end. The statistics are drawn from the Glass Lewis system (via the custodian of the Mercer Funds). Glass Lewis is a leading provider of governance and proxy voting services.

Fund	Total Proposals		Vote Decision					For/Against Mgmt		Meetings	
	Eligible Proposals	Proposals Voted On	For	Against	Abstain	No Action	Other	For	Against	No.	Against
Mercer Multi-Asset Credit Fund ⁽¹⁾	28	28	100%	0%	0%	0%	0%	100%	0%	2	0%
MGI Emerging Markets Equity Fund	4,965	4,706	85%	10%	2%	4%	0%	90%	10%	497	37%
MGI Global Equity Fund	9,139	8,913	86%	11%	1%	2%	0%	90%	10%	650	44%
Mercer Global Small Cap Equity Fund	9,257	8,965	90%	7%	1%	3%	0%	92%	8%	820	36%
Mercer Passive Sustainable Global Equity UCITS CCF	15,945	15,566	77%	21%	1%	2%	0%	77%	23%	1104	76%

⁽¹⁾ Voting Activity figures for the Mercer Multi-Asset Credit fund relate to a small number of equity holdings within the fund's underlying segregated mandates. Please note this does not include voting activity from any underlying pooled strategies within the fund over the period

⁽²⁾ There are a number of limited circumstances where voting rights may not be exercised relating to, for example, conflicts of interest, share-blocking markets, power of attorney (POA) markets etc.

- “Eligible Proposals” reflect all proposals of which managers were eligible to vote on over the period
- “Proposals Voted On” reflect the proposals managers have voted on over the period (including votes For and Against, and any frequency votes encompassed in the “Other” category)”
- Vote Decision may not sum to 100 due to rounding. “No Action” reflects instances where managers have not actioned a vote. MGIE may follow up with managers to understand the reasoning behind these decisions, and to assess the systems managers have in place to ensure voting rights are being used meaningfully
- “Other” refers to proposals in which the decision is frequency related (e.g. 1 year or 3 year votes regarding the frequency of future say-on-pay).
- “Meetings No.” refers to the number of meetings the managers were eligible to vote at.
- “Meetings Against” refers to the no. of meetings where the managers voted at least once against management, reported as a % of the total eligible meetings.
- Voting statistics are not applicable to Asset-Backed Securities (ABS) fund managers, as these investments do not carry voting rights.

Significant Votes: The Trustee has based the definition of significant votes in line with the requirements of the Shareholder Rights Directive (SRD) II and on Mercer's engagement priority themes, The *most* significant proposals reported below relate to the three companies with the largest weight in each fund (relative to other companies in the full list of significant proposals), while considering Mercer's engagement priority themes.

Where available, information on next steps and plans to escalate are included in the following table.

Most Significant Votes

Fund	Company (Holding Weight)	Meeting Date: Proposal Text (Significance Category)	Manager Vote Decision (Intention to vote against management communicated – Rationale, if available)	Proposal Outcome (Next steps to report, if any)
Mercer Passive Sustainable Global Equity UCITS CCF	Microsoft Corporation (5.8%)	05/12/2025: Shareholder Proposal Regarding Report on AI Human Rights Due Diligence (Social)	Manager Vote Decision: Against (Intention to vote against management communicated: N/A) Rationale: A vote AGAINST is applied as the resolution is too narrowly focused on Conflict-Affected and High-Risk Areas (CAHRAs), and the manager believes the company has taken corrective actions following an independent investigation, in line with their expectation. Following engagement with the company, the manager is encouraged by the steps taken to mitigate the identified risks and would encourage the company to disclose the details of the changes made in response to the incident to prevent similar issues in the future.	Proposal did not pass (25.8% Support) Next steps to report — Following the incident with Israeli Ministry of Defense, the company acknowledged limitations, including lack of visibility into how customers use software on self-managed servers. The manager will consider these examples when updating their AI governance and human rights considerations for the tech sector.
		05/12/2025: Shareholder Proposal Regarding Report on Risks of Providing AI to Facilitate New Oil and Gas Development and Production (Environmental)	Manager Vote Decision: Against (Intention to vote against management communicated: N/A) Rationale: A vote AGAINST this resolution is applied. The concerns by the proposal raised do not present significant material risks at this time. The company provides sufficient disclosure on its approach to providing services to energy sector customers.)	Proposal did not pass (8.6% Support) Next steps to report — (N/A)
	Meta Platforms Inc (3.3%)	28/5/2025 : Shareholder Proposal Regarding Transition Plan and Renewable Energy (Environmental)	Managers Vote Decision: Mixed For (1) (Intention to vote against management communicated: No) Rationale: A vote FOR this proposal is warranted, as shareholders would benefit from greater disclosure on the company's climate transition strategy in light of expanded data center operations. Against (2) (Intention to vote against management communicated: N/A) Rationale: A vote AGAINST this resolution is warranted. The company appears to provide sufficient information for investors to be able to determine how effectively it is addressing climate-related risks and opportunities.	Proposal did not pass (3.2% Support) Next steps to report — The manager who voted FOR stated that there is still strong resistance to climate-related proposals, and with only 3.25% voting in favour, the proposal was rejected.

MGI Global Equity Fund	Microsoft Corporation (3.7%)	05/12/2025: Shareholder Proposal Regarding Report on AI Human Rights Due Diligence (Social)	Managers Vote Decision: Mixed For (1) (Intention to vote against management communicated: No) Rationale: A vote FOR this resolution is warranted. The recent controversy related to the misuse of the company's Azure technology — which Microsoft identified only after external reporting and public scrutiny — raises questions about the effectiveness of its HRDD processes and exposes the company to legal, reputational, operational and financial risks. The company and its shareholders would benefit from a report assessing the effectiveness of Microsoft's human rights due diligence processes in preventing, identifying, and addressing customer misuse of its artificial intelligence and cloud products or services. Against (1) (Intention to vote against management communicated: No) Rationale: The manager doesn't believe those reports/risk assessments would be additive as they're covered in other materials and thus it's not something management should be focused on.	Proposal did not pass (25.8% Support) Next steps to report — N/A
		05/12/2025: Shareholder Proposal Regarding Report on Risks of Providing AI to Facilitate New Oil and Gas Development and Production (Environmental)	Manager Vote Decision: Against (Intention to vote against management communicated: No) Rationale: A vote AGAINST this resolution is warranted. The company has set climate goals for its emissions, and it does not appear that the emissions of its customers pose a significant risk to shareholders at this time.	Proposal did not pass (8.6% Support) Next steps to report — (N/A)
	Amazon.com Inc. (2.8%)	21/5/2025 : Shareholder Proposal Regarding Climate Commitments and AI Data Centers (Environmental)	Managers Vote Decision: Mixed For (1) (Intention to vote against management communicated: Yes) Rationale: The manager supported a shareholder resolution requesting a report explaining how it will meet its climate change goals given the massively growing energy demand from artificial intelligence and Amazon's plan to build more data centres. The manager thinks that how Amazon will meet the energy requirements of its rapid data centre build out is an investment material question as it will require considerable management time and capital allocation. The manager therefore think additional information on Amazon's thinking would benefit shareholders.) Against (2) (Intention to vote against management communicated: N/A) Rationale: A vote AGAINST this proposal is warranted. The company appears to	Proposal did not pass (20% Support) Next steps to report — Ahead of the meeting, the manager who voted FOR discussed this resolution with the company and shared the manager's intention to support it. The manager continues to discuss this topic with the company as they believe additional insight into how energy use is being considered alongside their climate goals would help shareholders in their risk assessments.

		provide sufficient details related to its sustainability initiatives focused on reducing the carbon footprint of its data centers and related metrics to gauge its progress towards achieving its climate goals.	
	21/5/2025 : Shareholder Proposal Regarding Disclosure of Material Scope 3 Emissions (Environmental)	Managers Vote Decision: Mixed For (1) (Intention to vote against management communicated: Yes) Rationale: The manager supported a shareholder resolution requesting additional emissions reporting. There are many reasons why a broader boundary would be useful to shareholders. It would reveal more about the scale of the company's true commercial carbon footprint and enable engagement on particular areas of concentration and possible mitigants. It also has reputational relevance which could work to Amazon's long-term advantage in customer attraction and retention. Against (2) (Intention to vote against management communicated: N/A) Rationale: A vote AGAINST this proposal is warranted, as the company appears to be taking sufficient action to measure and reduce its Scope 3 emissions.	Proposal did not pass (13.8% Support) Next steps to report — The manager who voted FOR stated that expanding the carbon emissions reporting boundary continues to be a priority for them, and their support for this resolution is an escalation of that longstanding engagement on this matter. Over the next year, they intend to further this discussion.
	21/5/2025 : Shareholder Proposal Regarding Report on Plastic Packaging (Environmental)	Managers Vote Decision: Against (Intention to vote against management communicated: N/A) Rationale: The manager opposed a shareholder resolution requesting a report on the company's efforts to reduce its flexible plastic packaging. While the manager supported a similar resolution last year and continues to think this is an important issue for the company, the manager believes that the more material topics for the company right now are around its Scope 3 emissions and the consideration of data center expansion and the impact on its climate goals. Further, the manager thinks the company has taken significant action in the last year on this topic and does not believe a specific report on the company's flexible packaging would provide any immediate insight.	Proposal did not pass (13.5% Support) Next steps to report — The manager believes the company continues to make good progress, but the manager notes that it still does not have a clear strategy. The manager did not support this resolution this year because, in the short term, the manager's focus remains on the company's energy use to power its data centers. However, it does remain a peripheral topic of engagement.
	21/5/2025 : Shareholder Proposal Regarding Report on Working Conditions (Social)	Managers Vote Decision: Against (Intention to vote against management communicated: N/A) Rationale: The manager opposed a shareholder resolution requesting a third-party audit on warehouse working conditions. The company continues to make demonstrable progress on health and safety. The company continues to provide extensive disclosure and detailed safety metrics and to take pre-emptive action by investing in safety initiatives, technology, and programs. This is consistent with how the manager has voted on this resolution previously.	Proposal did not pass (22.3% Support) Next steps to report — This was the fourth year this resolution was filed, and the manager continued to oppose it. Support for the resolution has declined since last year from 31% to 22%. The manager continues to believe that this is a material issue for

				the company; however, from speaking with the company and reviewing their current disclosures, the manager also thinks the company continues to consider workplace safety seriously and provides good disclosure around their efforts and progress. The manager continues to monitor Amazon's approach closely.
Alphabet Inc (2.9%)	06/06/2025 : Shareholder Proposal Regarding Disclosure Related to 2030 Climate Goals (Environmental)	Managers Vote Decision: Mixed For (1) (Intention to vote against management communicated: No) Rationale: A vote FOR this resolution is warranted, as additional disclosure about the company's GHG emissions reduction targets and climate transition plan would help shareholders better evaluate the company's strategy around the transition to a low-carbon economy and its management of related risks and opportunities. Against (2) (Intention to vote against management communicated: No) Rationale: A vote AGAINST this proposal is warranted. Alphabet discloses in detail its reduction strategies and initiatives for Scope 1, 2, and 3 emissions and year-over-year emissions data. In addition, the company discusses the challenges in reducing emissions in the short term, including those associated with the impact of AI and related increases in technical infrastructure investment. While incorporating certain aspects of the proponents' request into the company's current disclosures may be beneficial to interested shareholders, full implementation of the proposal does not appear necessary at this time. However, continued monitoring of the company's emissions is warranted.	Proposal did not pass (8.2% Support) Next steps to report — The manager who voted FOR stated that their approach to voting is principles-based. Each vote is cast in accordance with their Voting Policy, which reflects their expectations for responsible corporate governance. While the manager do not conduct separate evaluations of voting outcomes or follow up with engagement, the manager ensure that their voting decisions are consistent, transparent, and supportive of long-term shareholder value.	
	06/06/2025 : Shareholder Proposal Regarding Human Rights Impact Assessment of AI-Driven Targeted Advertising (Social)	Managers Vote Decision: For (Intention to vote against management communicated: No) Rationale: A vote FOR this proposal is warranted, as an independent human rights impact assessment would strengthen the company's ability to address potential risks associated with its AI-driven advertising practices, particularly amid a recent data privacy settlement.	Proposal did not pass (14.3% Support) Next steps to report — The manager's approach to voting is principles-based. Each vote is cast in accordance with the manager's Voting Policy, which reflects the manager's expectations for responsible corporate governance. While the manager does not conduct separate evaluations of voting outcomes or follow up with engagement, they ensure that voting decisions are consistent, transparent, and supportive of long-term shareholder value.	

		06/06/2025 : Shareholder Proposal Regarding Third-Party Report on Due Diligence in Conflict-Affected and High-Risk Areas (Social)	Managers Vote Decision: Mixed For (1) (Intention to vote against management communicated: No) Rationale: A vote FOR this proposal is warranted because shareholders would benefit from additional disclosure on the company's human rights due diligence process which would allow shareholders to fully evaluate associated risks, including end use due diligence and customer due diligence in conflict-affected and high-risk areas. Against (2) (Intention to vote against management communicated: No) Rationale: A vote AGAINST the proposal is warranted. The company appears to provide sufficient disclosures to allow shareholders to assess how it manages human rights risks.	Proposal did not pass (4.5% Support) Next steps to report — The manager who voted FOR stated that their approach to voting is principles-based. Each vote is cast in accordance with their Voting Policy, which reflects their expectations for responsible corporate governance. While the manager do not conduct separate evaluations of voting outcomes or follow up with engagement, the manager ensure that their voting decisions are consistent, transparent, and supportive of long-term shareholder value.
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Note— These funds, namely the **Mercer Global Small Cap Equity Fund, MGI Emerging Markets Equity Fund and Mercer Multi-Asset Credit Fund** do not have any votes deemed to be significant based on our definition of significant votes. Our definition specifically focuses on Mercer's Global Engagement Priority Themes.