Implementation Statement for the Commonwealth War Graves Commission Superannuation Scheme

Covering 1 April 2025 to 31 March 2026

1. Background

The Trustee of the Commonwealth War Graves Commission Superannuation Scheme (the "Scheme") is required to produce a yearly statement to set out how, and the extent to which, the Trustee has followed the Scheme's Statement of Investment Principles ("SIP") during the previous Scheme year, primarily in relation to engagement and voting behaviour during the year, either by or on behalf of the Trustee, or if a proxy voter was used.

This statement should be read in conjunction with the SIP and 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 subsequent amendment in **The Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019**.

2. Statement of Investment Principles

The SIP applicable to the period up to 31 March 2026 was the SIP dated May 2023. Since the year-end, the Trustee has reviewed and updated the SIP, with latest version now dated May 2026.

The Trustee's investment strategy remained broadly unchanged over the year, with the last major change having been a de-risk into the 'trigger 2' portfolio in January 2024 in connection with the trigger-based de-risking framework which is set out in the May 2023 SIP.

During the year progress was reviewed at least on a quarterly basis by reviewing the funding and investment risk position of the Scheme on a 'low dependency' basis using the Moody's PFaroe Dashboard.

The May 2023 SIP slightly over-stated the degree of engagement activity that was being undertaken by the Trustee. This has been rectified in the updated May 2026 SIP which now more accurately reflects the engagement activity undertaken by the Trustee. Trustee has followed the May 2026 SIP in relation to engagement activity during the year.

In all other respects, the May 2023 SIP has been followed during the year.

A copy of the most recent May 2026 SIP can be found at https://www.cwgc.org/who-we-are/pension-scheme/

3. Voting and Engagement

As noted in the SIP, given the size of the Scheme all of the Scheme's investments are held through pooled vehicles and, as a result, the Trustee is not able to directly influence the Environmental, Social and Governance (ESG) policies or voting activity in respect of the underlying holdings. Therefore, the Trustee has not used proxy voting services over the year. Consistent with previous years, engagement activities and voting rights attached to investments are exercised by the relevant investment managers in accordance with their own stewardship policies and governance frameworks.

The Scheme was invested in the following funds at the scheme year end:

- LGIM All World Equity Fund
- BNY Mellon Real Return Fund

- Schroders Life Diversified Growth Fund
- Insight Broad Opportunity Fund
- LGIM Synthetic Leveraged Equity Fund
- LGIM LDI Matching Core Long Fund - Nominal
- LGIM LDI Matching Core Long Fund - Real
- LGIM LDI Matching Core Short Fund – Real
- LGIM LDI Matching Core Short Fund - Nominal
- Threadneedle Property Unit Trust
- LGIM Global Unconstrained Bond Fund

The underlined funds do not hold physical equities and hence there are no voting rights and voting data for the Trustee to report on.

3. Description by Investment Managers of their voting processes

a. LGIM

LGIM describe their voting process as follows:

"All decisions are made by LGIM's Investment Stewardship team and in accordance with their relevant Corporate Governance & Responsible Investment and Conflicts of Interest policy documents which are reviewed annually. Each member of the team is allocated a specific sector globally so that the voting is undertaken by the same individuals who engage with the relevant company. This ensures their stewardship approach flows smoothly throughout the engagement and voting process and that engagement is fully integrated into the vote decision process, therefore sending consistent messaging to companies.

LGIM's voting and engagement activities are driven by ESG professionals and their assessment of the requirements in these areas seeks to achieve the best outcome for clients. Their voting policies are reviewed annually and take into account feedback from clients.

Every year, LGIM holds a stakeholder roundtable event where clients and other stakeholders (civil society, academia, the private sector and fellow investors) are invited to express their views directly to the members of the Investment Stewardship team. The views expressed by attendees during this event form a key consideration as LGIM continue to develop their voting and engagement policies and define strategic priorities in the years ahead. They also take into account client feedback received at regular meetings and/ or ad-hoc comments or enquiries.

LGIM's Investment Stewardship team uses ISS's 'Proxy Exchange' 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 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, LGIM have put in place a custom voting policy with specific voting instructions. These instructions apply to all markets globally and seek to uphold what LGIM 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 LGIM's 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 LGIM to apply a qualitative overlay to their voting judgement. LGIM have strict monitoring controls to ensure their votes are fully and effectively executed in accordance with their 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 LGIM of rejected votes which require further action."

b. Schroders

Schroders describe their voting process as follows:

"As active owners, we recognise our responsibility to make considered use of voting rights. We therefore vote on all resolutions at all AGMs/EGMs globally unless we are restricted from doing so (e.g. as a result of share blocking).

We aim to take a consistent approach to voting globally, subject to regulatory restrictions that is in line with our Proxy Voting Policy.

The overriding principle governing our voting is to act in the best interests of our clients. Where proposals are not consistent with the interests of shareholders and our clients, we will vote against resolutions. We may abstain where mitigating circumstances apply, for example where a company has taken steps to address shareholder issues.

We evaluate voting resolutions arising at our investee companies and, where we have the authority to do so, vote on them in line with our fiduciary responsibilities in what we deem to be the interests of our clients. Our Corporate Governance specialists assess each proposal. and consider a range of factors, including the circumstances of each company, long-term performance, governance, strategy and the local corporate governance code. Our specialists will draw on external research, such as that provided by Glass Lewis, the Investment Association's Institutional Voting Information Services and public reporting. Our own research is also integral to our process; this will be conducted by both our financial and Sustainable Investment analysts. For contentious issues, our Corporate Governance specialists consult with the relevant analysts and portfolio managers to seek their view and better understand the corporate context.

We also engage with companies throughout the year via regular face-to-face meetings, written correspondence, emails, phone calls and discussions with company advisors and stakeholders.

Glass Lewis (GL) acts as our one service provider for the processing of all proxy votes in all markets. GL delivers vote processing through its Internet-based platform Viewpoint. Schroders receives recommendations from GL in line with our own bespoke guidelines, in addition, we receive GL's Standard research. This is complemented with analysis by our in house ESG specialists and where appropriate with reference to financial analysts and portfolio managers.

GL automatically votes all our holdings of which we own less than 0.5% (voting rights) excluding merger, acquisition and shareholder resolutions. This ensures consistency in our voting decisions as well as creating a more formalised approach to our voting process."

c. Insight

Insight describe their voting process as follows:

"Insight retains the services of Minerva Analytics (Minerva) for the provision of proxy voting services and votes at meetings where it is deemed appropriate and responsible to do so. Minerva provides research expertise and voting tools through sophisticated proprietary IT systems allowing Insight to take and demonstrate responsibility for voting decisions. Independent corporate governance analysis is drawn from thousands of market, national and international legal and best practice provisions from jurisdictions around the world. Independent and impartial research provides advance notice of voting events and rules-based analysis to ensure contentious issues are identified. Minerva Analytics analyses any resolution against Insight-specific voting policy templates which will determine the direction of the vote. In addition, please refer to our Proxy Voting Policy, which sets out in detail our approach to voting on resolutions:

https://www.insightinvestment.com/globalassets/documents/responsible-investment/responsible-investment-reports/proxy-voting-policy.pdf"

d. BNY Mellon

BNY Mellon ("Newton") describe their voting process as follows:

"Newton has established overarching stewardship principles which guide our ultimate voting decision, based on guidance established by internationally recognized governance principles including the OECD Corporate Governance Principles, the ICGN Global Governance Principles, the UK Investment Association's Principles of Remuneration and the UK Corporate Governance Code, in addition to other local governance codes. All voting decisions are taken on a case-by-case basis, reflecting our investment rationale, engagement activity and the company's approach to relevant codes, market practices and regulations. These are applied to the company's unique situation, while also taking into account any explanations offered for why the company has adopted a certain position or policy. It is only in the event that we recognise a material conflict of interest that we apply the vote recommendations of our third-party voting administrator.

Newton seeks to make proxy voting decisions that are in the best long-term financial interests of its clients and which seek to support investor value by promoting sound economic, environmental, social and governance policies, procedures and practices through the support of proposals that are consistent with following four key objectives:

- To support the alignment of the interests of a company's management and board of directors with those of the company's investors;
- To promote the accountability of a company's management to its board of directors, as well as the accountability of the board of directors to the company's investors;
- To uphold the rights of a company's investors to effect change by voting on those matters submitted for approval; and
- To promote adequate disclosure about a company's business operations and financial performance in a timely manner.

In general, voting decisions are taken consistently across all Newton's clients that are invested in the same underlying company. This is in line with Newton's investment process that focuses on the long-term success of the investee company. Further, it is Newton's intention to exercise voting rights in all circumstances where it retains voting authority.

All voting opportunities are communicated to Newton by way of an electronic voting platform.

The Responsible Investment team reviews all resolutions for matters of concern. Any such contentious issues identified may be referred to the appropriate global fundamental equity analyst or portfolio manager for comment. Where an issue remains contentious, Newton may also decide to confer or engage with the company or other relevant stakeholders.

An electronic voting service is employed to submit voting decisions. Each voting decision is submitted via the electronic voting service by a member of the Responsible Investment team but can only be executed by way of an alternate member of the team approving the vote within the same system.

Members of certain BNY Mellon operations teams responsible for administrative elements surrounding the exercise of voting rights by ensuring the right to exercise clients' votes is available and that these votes are exercised."

4. Summary of voting behaviour over the year

A summary of voting behaviour over the period is provided in the tables below

	Summary Info
Manager name	LGIM
Fund name	All World Equity Index Fund
Approximate value of Trustee's assets	c. £7.8m as at 31 March 2026
Number of equity holdings in the fund	4,267
Number of meetings eligible to vote	6,820
Number of resolutions eligible to vote	68,549
% of resolutions voted	99.96%
% of resolutions voted with management	77.91%
% of resolutions voted against management	20.5%
% of resolutions abstained	1.58%
% of meetings with at least one vote against managements	61.24%
% of resolutions voted contrary to the proxy adviser recommendation	9.44%

	Summary Info
Manager name	Schroders
Fund name	Life Diversified Growth Fund
Approximate value of Trustee's assets	c.£5.1m as at 31 March 2026
Number of meetings eligible to vote	1,324
Votable Proposals	17,412
Proposals Voted	16655 |95.65%
FOR Votes	14930 |89.64%
AGAINST Votes	1726 |10.36%
ABSTAIN Votes	29 | 0.17%
Contrary to Proxy adviser	1421| 8.53%
Meetings voted at least once AGAINST Management	780| 60.23%

	Summary Info
Manager name	Insight
Fund name	Broad Opportunities Fund
Approximate value of Trustee's assets	c. £5.1m as at 31 March 2026
Number of equity holdings in the fund	4
Number of meetings eligible to vote	11
Number of resolutions eligible to vote	160
% of resolutions voted	100.00%
% of resolutions voted with management	99.40%
% of resolutions voted against management	0.60%
% of resolutions abstained	0.00%
% of resolutions voted, for which at least one vote was against	9.00%

	Summary Info
Manager name	Newton Investment Management Limited
Fund name	BNY Mellon Real Return Fund
Approximate value of Trustee's assets	c. £5.2m as at 31 March 2026
Number of equity holdings in the fund	69
Number of meetings eligible to vote	63
Number of resolutions eligible to vote	960
% of resolutions voted	98.6%
% of resolutions voted with management	92.2%
% of resolutions voted against management	7.8%
% of resolutions abstained	0.00%
% of meetings with at least one vote against managements	43.0%
% of resolutions voted contrary to the proxy adviser recommendation	8.1%

5. Most significant votes over the year

a. LGIM

Commentary on the most significant votes over the period is set below.

In determining significant votes, LGIM's Investment Stewardship team takes into account the criteria provided by the Pensions & Lifetime Savings Association consultation (PLSA). This includes but is not limited to:

- High profile vote which has such a degree of controversy that there is high client and/or public scrutiny;
- Significant client interest for a vote: directly communicated by clients to the Investment Stewardship team at LGIM's annual Stakeholder roundtable event, or where LGIM note a significant increase in requests from clients on a particular vote;
- Sanction vote as a result of a direct or collaborative engagement;
- Vote linked to an LGIM engagement campaign, in line with LGIM Investment Stewardship's 5-year ESG priority engagement themes.

LGIM provide information on significant votes in the format of detailed case studies in our quarterly ESG impact report and annual active ownership publications.

Most Significant votes for the LGIM All World Equity Index Fund:

Company name	Microsoft Corporation	SK hynix, Inc.
Date of vote	2025-12-05	2026-03-25
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	3.9%	3.2%
Summary of the resolution	Resolution 1f: Elect Director Satya Nadella	Resolution 4.1: Elect Jeong Deok-gyun as Outside Director
How you voted	Against	For
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 our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.	LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics.
Rationale for the voting decision	Joint Chair/CEO: A vote against is applied as LGIM expects companies to separate the roles of Chair and CEO due to risk management and oversight concerns.	Director Election: A vote for is applied as no major concerns have been highlighted.
Outcome of the vote	Pass (94%)	N/A
Implications of the outcome eg were there any lessons learned and what likely future steps will you take in response to the outcome?	L&G will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.	L&G will continue to engage with our investee companies, publicly advocate our position on this issue and monitor company and market-level progress.
On which criteria (as explained in the cover email) have you assessed this vote to be "most significant"?	Thematic - Board Leadership: L&G considers this vote to be significant as it is in application of an escalation of our vote policy on the topic of the combination of the board chair and CEO.	Pre-declaration: This shareholder resolution is considered significant due to director elections taking place during the first proxy season following reforms to the Korean Commercial Act, which enhanced expectations around board and audit committee independence and oversight. Further information on L&G's pre-declared voting intentions for 2026 is available here: https://blog.landg.com/categories/responsible-investing-and-long-term-themes/our-voting-intentions-for-2026/.

b. Schroders

Schroders believe that all resolutions when we vote against the board's recommendations should be classified as a significant vote, for example, votes against the re-election of directors, on executive remuneration, on material changes to the business (such as capital structure or M&A), on climate matters and on other environmental or social issues may all be more or less significant to different client stakeholders.

Most Significant votes for Schroders Diversified Growth Fund

Schroders significant vote criteria is broad and encompasses all votes against management. Specific votes were not provided at the time of completing the report.

c. Insight

Insight "most significant" votes are defined as follows:

"Minerva Analytics analyses any resolution against Insight-specific voting policy templates which will determine the direction of the vote. Minerva Analytics monitors company meeting agendas and items to be voted on. Minerva reviews each vote against Insight's specific criteria and provides a recommendation for each item. Insight votes in line with the recommendations of the proxy voting agent and documents where it makes a voting decision against the recommendation. The rationale for, abstaining or voting against the voting recommendation is retained on the Minerva platform on a case-by-case basis.

As mentioned previously, the strategy invests in listed closed-end investment companies with a focus on cash-generative investments in social infrastructure, renewable energy and asset-backed aviation finance. The corporate structure of closed-end investment companies held in the strategy includes an independent board which is responsible for providing an overall oversight function on behalf of all shareholders. This governance framework includes a range of aspects including setting out investment objectives, and on an ongoing basis ensuring that the underlying strategy and portfolio activities within it remain within the agreed framework. This governance framework, that is with an independent board acting on behalf of shareholders, generally limits contentious issues that can arise with other listed entities. As a result, we have voted in line with recommendations of our proxy voting provider on all occasions."

Most Significant votes for Insight Broad Opportunity Fund

Company name	The Renewables Infrastructure Group	Greencoat UK Wind plc
Date of vote	27/06/2025	14/04/2025
Approximate size of fund's holding as at the date of the vote (as % of portfolio)	0.7%	0.8%
Summary of the resolution	To re-elect as a director, Richard Morse	To approve that the company cease to continue its business as a closed-ended investment company
How you voted	Against	Against
Where you voted against management, did you communicate your intent to the company ahead of the vote?	We do not communicate intentions ahead of time	We do not communicate intentions ahead of time
Rationale for the voting decision	"In February 2025, the company announced IMA and Operations Management changes that we believed had the potential to 1) incentivise debt refinancing – which would be detrimental to flow of distributions to shareholders, and 2) undermine Board's independence by appearing to favour InfraRed through fees payable to them in the event of a takeover. We challenged these proposals in engagement with board, noting that: 1) Fee calculation methodology - Although would result in a reduction of ongoing management fees to Infrared of 28% vs 2024, we believed the fees should be based on the lower of market cap and NAV, matching the approach taken by UK Greencoat Wind. 2) Transaction fees payable to Infrared on disposals and raising of new debt. We questioned the need for incentives on disposals when the company has sold £240m in the last 24 months at an average premium of over 10% to NAV. After discussions we noted the incentive encourages disposals at a premium to NAV and can accelerate disposals which could be used for reducing RCF. We also questioned the incentive to raise debt financing which has the potential for	"The company's articles include a discount management provision requiring a continuation resolution to be proposed to the shareholders if, in any financial year, the company's ordinary shares trade at a discount in excess of ten per cent to the Net Asset Value per ordinary share. Over the course of the 2024 financial year, the company's ordinary shares traded at an average discount of fourteen per cent to the prevailing Net Asset Value per ordinary share and, as such, a continuation vote was proposed at the AGM. We voted against the continuation vote for the following reasons: 1) The company continues to deliver inflation-linked dividend growth and attractive long-term returns, supported by a resilient portfolio and a strong multi-year track record 2) The Board is actively addressing the discount to NAV through disciplined capital allocation, including share buybacks, asset disposals and debt reduction, underpinned by robust cash generation.

	changing the risk profile of the portfolio and be detrimental to flow of distributions to shareholders. 3) Takeover fees payable of 3% of the value achieved in excess of net asset value and 3% of the value achieved in excess of market capitalisation. Such a fee would be capped at 4.99% of the lower of net asset value or market capitalisation, but we questioned the rationale for this value transfer from shareholders to manager. Ultimately the majority of the proposed changes were reversed. However, in light of the Board making unilateral changes to fee arrangements without shareholder engagement, we were of the opinion that the board should be held accountable and therefore voted against the re-election of the board chair."	3) Discontinuation would undermine long-term shareholder value, as the strategy remains appropriate, well executed and strongly aligned with shareholder interests"
Outcome of the vote	Re-election of Richard Morse as a Director passed with 99.15% votes cast in favour.	89.52% of votes were cast against the discontinuation resolution
Implications of the outcome eg were there any lessons learned and what likely future steps will you take in response to the outcome?	We plan to maintain discussions with the company's manager and the Board as part of our on-going monitoring.	We plan to maintain discussions with the company's manager and the Board as part of our on-going monitoring.
On which criteria (as explained in the cover email) have you assessed this vote to be "most significant"?	We selected this example to highlight our investment approach in relation to our infrastructure holdings, in particular our use of pro-active engagement opportunities to influence the company's decision making in areas affecting governance, strategy, or long-term value.	We selected this example to demonstrate that discontinuation would risk undermining long-term shareholder value, given the strength, execution and shareholder alignment of the company's strategy.

d. BNY Mellon

BNY Mellon "most significant" votes are defined as follows:

"We regard as material issues all votes against management, including where we support shareholder resolutions that the company's management are recommending voting against. As active managers, we invest in companies that we believe will support the long term performance objectives of our clients. By doing so, we are making a positive statement about the business, the management of risks and the quality of management.

Voting against management, therefore, is a strong statement that we think there are areas for improvement. As such, by not supporting management, we think that this is material, which is different to a passive investor where there is no automatic assumption of a positive intent in ownership. As such, we report publicly our rationale for each instance where we have voted against the recommendation of the underlying company's management.

At the fund level, we consider each instance of voting against management to be significant but if required to prioritise these instances, we take an objective approach that includes the fund's weighting in each security."

Most Significant votes for BNY Mellon Real Return Fund

Company name	Netflix, Inc.	Unilever Plc
Date of vote	05-Jun-25	30-Apr-25
Approximate size of fund's/mandate's holding as at the date of the vote (as % of portfolio)	0.87	1.59
Summary of the resolution	Elect Director Jay C. Hoag	Approve Remuneration Report
How you voted	Against	AGAINST
Where you voted against management, did you communicate your intent to the company ahead of the vote?	No	No
Rationale for the voting decision	We voted against the incumbent Nominating Committee Chair because the key committee has more than 50% long-tenured directors (more than 12 years). We voted against the re-election of this director owing to his/her attendance in board and committee meetings falling short of 75 per cent without a compelling justification.	We voted against executive pay arrangements owing to significant pay increases granted to executive(s) and the absence of a compelling rationale for this. Further, we voted against executive remuneration arrangements owing to the exit arrangements agreed with a former executive which we considered to be excessive.
Outcome of the vote	78.4% Against	27.7% AGAINST
Implications of the outcome eg were there any lessons learned and what likely future steps will you take in response to the outcome?	We consider board oversight as critical for shareholder value creation. The recurrent absence of directors for board meetings without a compelling justification raises concerns around the ability of directors to devote sufficient time and represent shareholders.	The vote outcome is an indication that shareholder dissatisfaction still persists at Unilever with respect to executive pay. In oru opinion, the exit arrangements albeit done under a different board composition and members, was not in line with best practice. Further, we believe, the executive compensation can be further aligned to shareholders by making the proportion more longer-term in nature. This remains a topic that we aim to speak on with the company's board.
On which criteria have you assessed this vote to be "most significant"?	The vote is considered significant as the director's election was rejected by shareholders. The board may still decide to keep him on board.	This vote provides an example of where a significant portion of the company's shareholders disagreed with a company's pay practices.