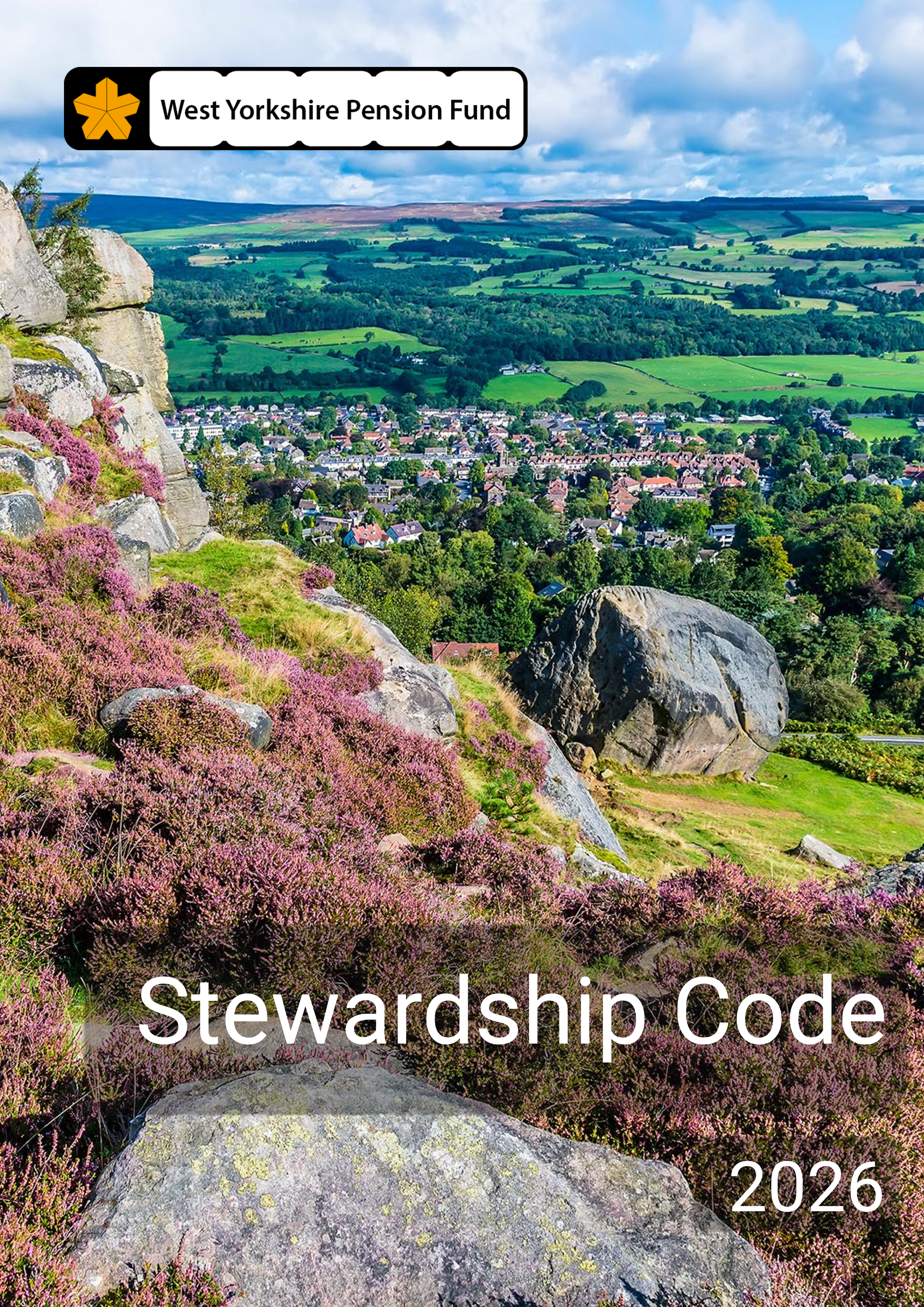
West Yorkshire Pension Fund



Stewardship Code

2026

Foreword

West Yorkshire Pension Fund (WYPF) is one of the largest of the 86 Local Government Pension Scheme (LGPS) funds in England and Wales that together comprise the biggest public pension scheme in the UK and one of the largest funded defined benefit programmes in the world.

WYPF is committed to responsible investment and strong governance, recognising that these principles are fundamental to long-term value creation and the fulfilment of our fiduciary duty to scheme members. This Stewardship Code submission details how we integrate stewardship considerations into our investment practices, reflecting our belief that active ownership is crucial for managing risk and maximising returns.

We believe that robust engagement with investee companies on environmental, social, and governance (ESG) factors drives positive change and enhances long-term performance. This submission outlines our approach to monitoring and engaging with companies, including our voting policy and how we escalate concerns. We prioritise issues material to our investments, such as climate change, board composition, and supply chain management, aligning our engagement activities with our broader responsible investment strategy.

We recognise the importance of transparency and accountability in stewardship and are committed to regularly reporting on our progress. This submission serves as a public demonstration of our commitment to the principles of the UK Stewardship Code and our ongoing efforts to promote sustainable and responsible investment practices. We believe that through active ownership and constructive dialogue, we can contribute to a more sustainable future for our members and the wider community. We welcome feedback on our approach and are committed to continuous improvement in our stewardship practices.

Cllr Andrew Thornton
Chair, WYPF

Introduction

Since its introduction in 2010, the UK Corporate Governance Code has been periodically updated in 2012 and 2020. Following extensive consultation, the Code was fully revised in 2026 and now is composed of two elements:

- Policy and Context Disclosure including information about the organisation, its governance and resourcing.
- Activities and Outcomes Report explaining how companies have applied the Principles through the activities they have undertaken in the preceding year and the outcomes of these activities.

Policy and Context Disclosure

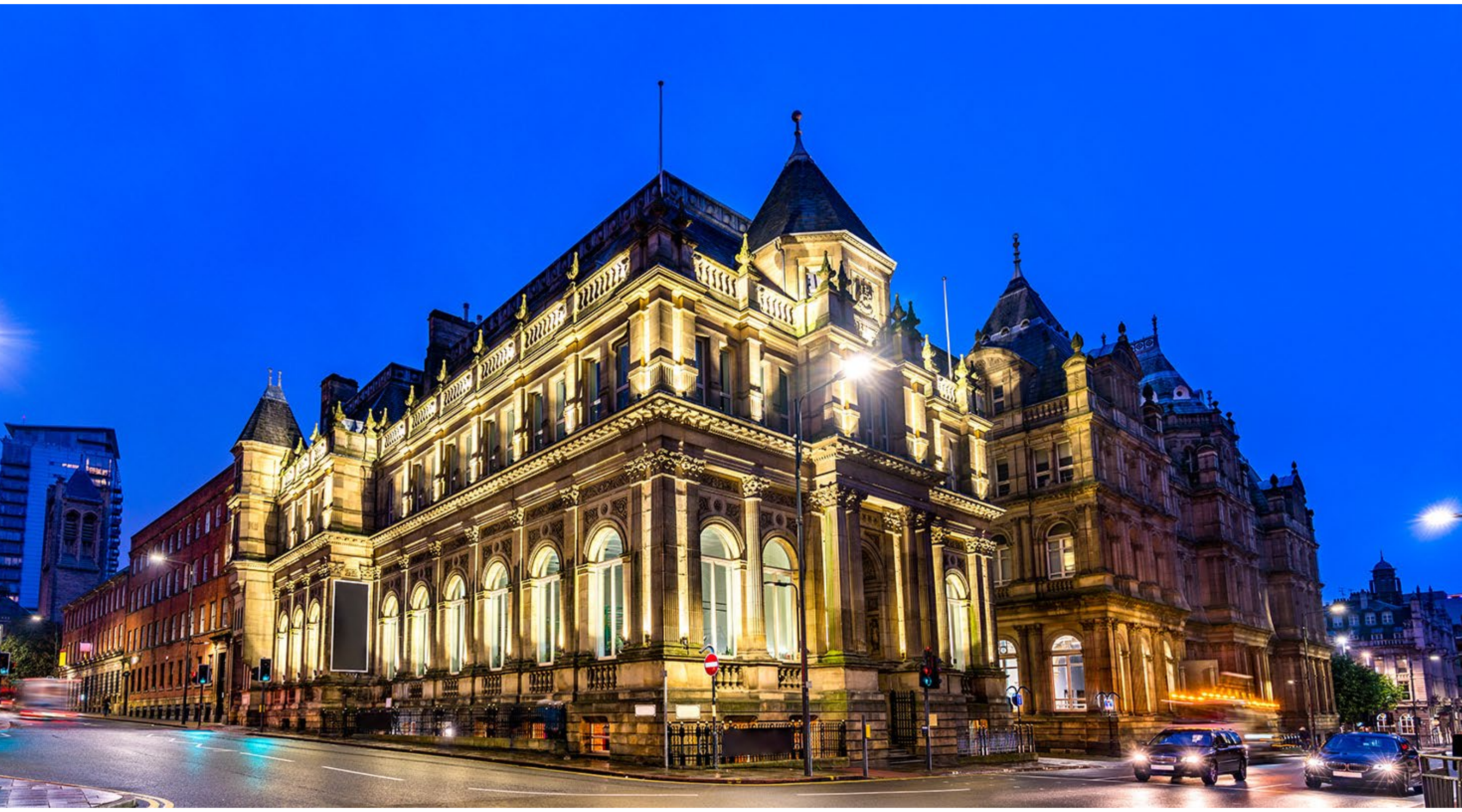
A. Describe your organisation, your investment beliefs, your clients or beneficiaries and how that informs your approach to stewardship.

B. Describe how your resources enable effective stewardship.

C. Describe your stewardship policies and processes, and how you review them.

D. Describe how you manage stewardship-related conflicts of interest to put the best interests of clients and beneficiaries first.

E. Describe how you maintain a dialogue with clients and/or beneficiaries.



A. Describe your organisation, your investment beliefs, your clients or beneficiaries and how that informs your approach to stewardship.

WYPF is a large LGPS fund administered by the City of Bradford Metropolitan District Council. As of 31 March 2026, the fund served roughly 328,000 members and about 500 active employers, with the five West Yorkshire councils as the largest employers and total assets close to £23bn. WYPF's statutory purpose is to invest contributions from members and employers to pay benefits as they fall due, while keeping employer contributions stable and maintaining long-term solvency.

WYPF remains open to new members, which reinforces the need for a long-term focus and stable investment strategy. Its most distinctive organisational feature is its choice to manage most listed equities and fixed income internally. Internal management has allowed WYPF's investment team to build long-standing relationships with investee companies, maintain deep knowledge of business models and ESG risks, and embed stewardship directly into stock selection, monitoring and engagement. This model also keeps costs low while giving the Fund close control over how ESG considerations are applied day-to-day.

While much of the portfolio is managed internally, WYPF is also an active participant in the Northern LGPS Pool ("the Pool") alongside similar LGPS funds from Merseyside and Greater Manchester. Through the Pool's collective vehicles, GLIL for infrastructure and NPEP for private equity, WYPF gains scale, shared governance and additional influence in asset classes where stewardship can be challenging. This arrangement ensures that stewardship expectations include private markets and is discussed in Section C and Principle five.

Our investment approach is both diversified across asset classes and global in reach, designed to meet actuarial return needs at prudent levels of risk. The Investment Strategy Statement (ISS) sets a Strategic Asset Allocation (SAA) framework, Table 1.

The Fund's investment beliefs, articulated in both the ISS and the Responsible Investment (RI) Policy, strongly influence its stewardship philosophy. WYPF believes that ESG issues are financially material to long-term returns and has adopted six ESG principles to express our approach further, see Table 2.

Table 1: Strategic asset allocation framework

Exposure	SAA Benchmark	Benchmark Index*	Control Ranges
UK Equity	16.5%	FTSE All Share	
North America Equity	16.5%	FTSE World NA	
Europe ex UK Equity Japan Equity Asia Pacific ex Japan Equity	16.5%	FTSE Developed Europe ex UK FTSE AW Japan FTSE Developed Asia ex Japan	
Emerging Markets Equity	5.5%	FTSE AW Emerging Markets	
Public Equities	**55%**		**+/- 7.5%**
General Private Equity	5%	FTSE World	+/- 3%
Infrastructure Private Equity	6.5%	Global (FTSE World) /UK(CPI+3%)	+/- 3%
Public & Private Equity	**66.25%**		**+/- 7.5%**
UK Sovereign (nominal)	7.5%	FTSE Actuaries UK Conventional Gilts Over 15 Years Index	
UK Sovereign (index-linked)	7.5%	FTSE Actuaries UK Index-Linked Gilts Over 5 Years Index	
Global Sovereign	2 ½ %	JPM Global Government bonds ex UK	
Sovereign Bonds	**17 ½ %**		**+/- 7.5%**
Public Credit Private Credit	5 ½%	FTSE UK Broad Investment-Grade Corporate Bond Index	
Credit	**5 ½%**		+/- 3%
Fixed Income	**23%**		**+/- 5%**
Equity + Debt + Absolute Return	5%	SONIA +2%	+/- 2 ½%
Alternatives	**6.5%**	**SONIA +2%**	**+/- 1%**
Property	**5%**	**AREF-MSCI UK Qtly Property**	
Cash	**2%**	**SONIA**	**+/- 2%**
Total Portfolio	**100%**		

The belief that ESG factors can profoundly impact an individual company's long-term profitability means stewardship is treated as part of sound risk management, not as a separate ethical overlay.

Table 2: WYPF's six ESG principles

Principle #1	WYPF recognises that ESG factors can profoundly impact an individual company's long-term profitability.
Principle #2	We do not believe that there is a trade-off between the investment performance of an asset and investing in a company that is behaving in a responsible and sustainable manner
Principle #3	WYPF chooses to be an informed and active manager.
Principle #4	WYPF recognises its stewardship responsibilities though engagement and voting.
Principle #5	As owners of companies, we have the power to change company behaviour.
Principle #6	WYPF recognises the impact our investment decisions have on the real world.

These ESG Principles shape a stewardship approach that emphasises informed ownership, consistent engagement and transparent voting. WYPF positions stewardship as a process, something developed across months or years, rather than short-term intervention. This is supported by the frequency of direct company meetings, the monitoring of firms with heightened ESG risks, and a willingness to escalate engagement, up to and including divestment where necessary. The Fund's preference, however, is to remain invested and use its shareholder influence to encourage improvement, based on the conviction that influence derives from ownership.

Beneficiary needs also shape stewardship. As a defined benefit scheme, WYPF's duty is to ensure pensions can be paid as they fall due and to keep employer contributions stable. This objective makes long-term risk management paramount. Stewardship therefore focuses on issues that could affect long-term value, such as governance quality, climate transition risks, supply-chain standards, and the resilience of business models to economic and regulatory change.

The regulatory environment further reinforces stewardship activity. WYPF operates within the LGPS regulatory framework, the UK Stewardship Code, pooling requirements and climate-disclosure expectations such as Task Force on Climate-Related Financial Disclosures (TCFD) and the Paris-Aligned Asset Owners (PAAO) commitments. These obligations shape the Fund's policies, escalation pathways, voting practices, and participation in investor initiatives and collaborative engagement.

Together, these organisational, cultural and regulatory factors create a stewardship model that is long-term, engagement-led, internally informed and closely integrated with investment decision-making. WYPF's approach reflects the Fund's identity as a cost-effective, internally managed LGPS investor with a duty of care to hundreds of thousands of members, guided by the belief that responsible investment is essential to securing sustainable long-term value.

B. Describe how your resources enable effective stewardship

WYPF's stewardship effectiveness is grounded in the resources it deploys across people, processes, governance structures and partnerships. The Fund's internal management of most of its listed equities and fixed income shapes much of its stewardship strength. WYPF directly employs a team of investment specialists who conduct research, select securities and maintain long-term relationships with investee companies. The fund also employs a dedicated ESG manager who assists the integration of Responsible Investment into the portfolio. This in-house model means stewardship is embedded in everyday investment decisions rather than outsourced or treated as an adjunct activity. Fund managers meet companies regularly, review ESG risks alongside financial fundamentals, and use both quantitative and qualitative ESG insights to guide engagement and voting.

The capability of the investment team is supported by structured access to research, data and training. WYPF subscribes to multiple research providers, receives detailed analysis from brokers and investment banks, and uses ESG datasets and frameworks to identify financially material risks. Fund managers are encouraged to pursue professional development, including qualifications such as the CFA, and the CIO ensures that both internal staff and external managers receive appropriate ESG training. These resources enable the team to evaluate complex, sector-specific ESG issues and integrate them into both engagement priorities and voting decisions.

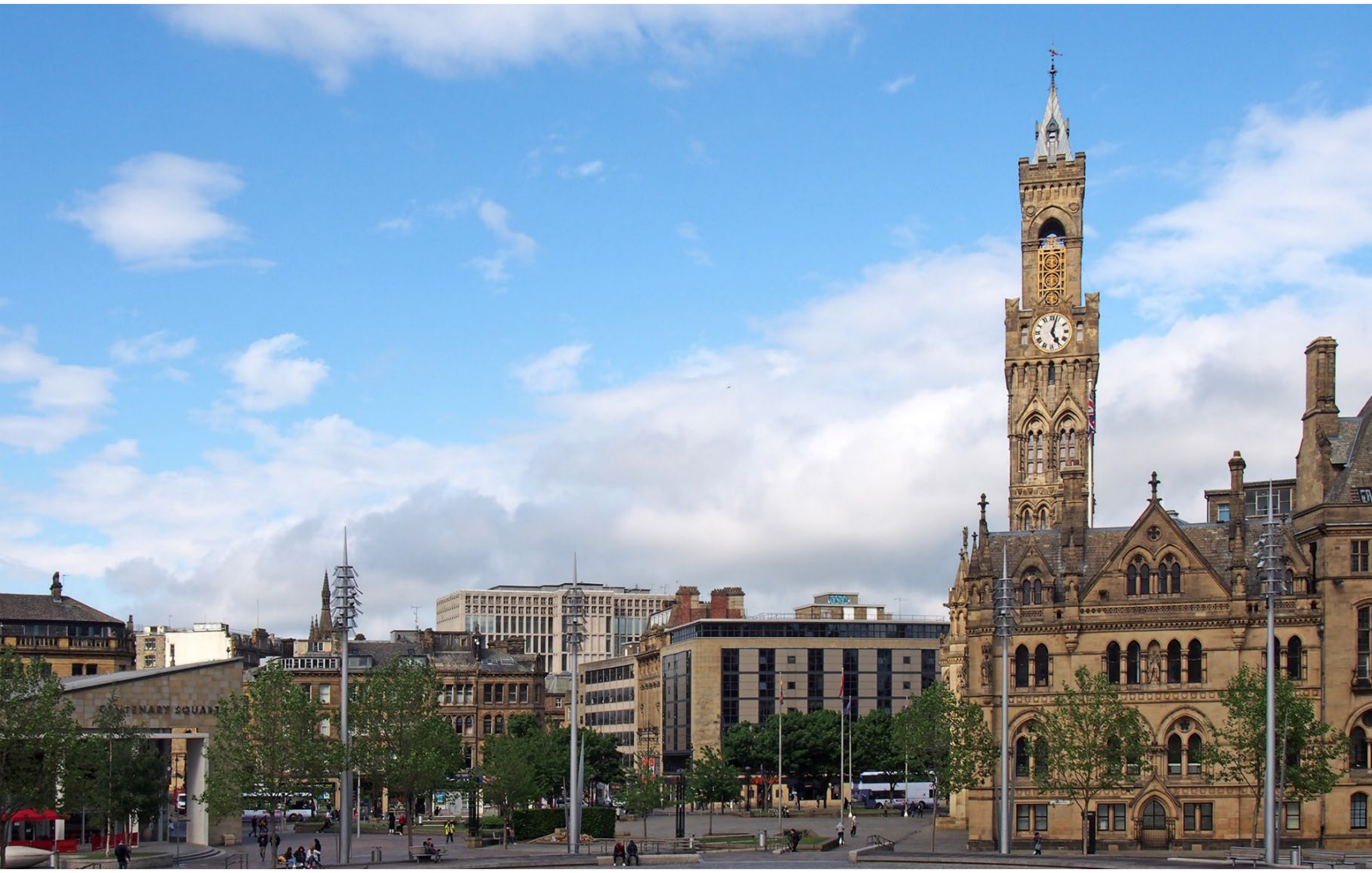
Stewardship is also operationally supported by defined processes for monitoring, engagement, escalation and voting. Engagements are structured with clear objectives, timeframes and milestones, and WYPF maintains ongoing dialogue with company management to assess progress.

Governance structures further strengthen stewardship. WYPF's Managing Director and CIO are responsible for the design and implementation of the Fund's responsible investment policies, while oversight is provided by the Advisory Panel and pension governance bodies. The structure ensures investment, stewardship and ESG matters are scrutinised at senior levels, while the Local Pension Board provides additional member and employer oversight focused on compliance and governance quality. These arrangements embed stewardship responsibilities into the Fund's formal decision-making and review processes.

Collaboration with external networks also enhances WYPF's stewardship resources. The Fund participates in investor groups such as the Local Authority Pension Fund Forum (LAPFF), the Institutional Investors Group on Climate Change (IIGCC), the Net Zero Engagement Initiative and Climate Action 100+. These networks provide specialised insight, facilitate engagement, and enable escalation on systemic issues such as climate transition, human rights and supply-chain governance. LAPFF, for example, engages hundreds of companies each year and reports quarterly on outcomes, giving WYPF leverage beyond what it could achieve on its own.

Finally, WYPF's stewardship resources are reinforced by its policy and reporting infrastructure. The Fund regularly publishes its ISS, annual Stewardship Code submission, Climate Report, voting disclosures and the Responsible Investment Policy. These documents clarify expectations for staff, asset managers and service providers, and ensure transparency to members, employers and the public. Clear, accessible reporting supports accountability and reinforces the alignment between WYPF's investment objectives, ESG beliefs and stewardship activities.

Taken together, WYPF's people, data, internal management model, governance structures, pooled resources and collaborative networks create a stewardship system that is well-resourced and fully integrated into the investment process. The result is a stewardship approach that is informed, continuous and capable of influencing companies toward behaviours that support long-term value for the Fund's beneficiaries.



C. Describe your stewardship policies and processes, and how you review them

WYPF's stewardship policies are set out across the ISS and RI Policy documents both of which define how the Fund exercises its responsibilities as a long-term asset owner. Together these documents articulate the principles, expectations and operational approach that shape the Fund's RI activities.

The ISS establishes the Fund's investment aims and beliefs, including the principle that ESG factors are materially relevant to long-term value and should therefore be reflected in investment decisions and owner responsibilities. It identifies stewardship as a core part of WYPF's role as a responsible asset owner and embeds expectations around monitoring, engagement and voting in alignment with the Fund's long-term objectives.

The RI Policy provides further detail on the way stewardship is applied across asset classes. It describes how WYPF integrates ESG factors into investment analysis, using Bloomberg data, research from brokers, and frameworks such as the SASB materiality map to identify material risks. ESG analysis is carried out both before investments are made and throughout the holding period, with the aim of supporting better long-term outcomes, reducing risk and improving portfolio resilience. The policy makes clear that WYPF treats ESG assessment as an investment discipline rather than an ethical overlay, and it explains how stewardship is exercised differently across different asset classes.

The Fund's stewardship policies also include clear expectations around engagement. WYPF distinguishes between routine company meetings and formal engagements, the latter occurring when material ESG or strategic issues require structured dialogue with management. Engagements are designed with clear objectives and milestones, and progress is assessed over time. Engagement is considered a long-term process, requiring patience and practical timeframes for companies to respond, while still allowing for escalation where expected progress does not materialise.

WYPF's stewardship processes are designed to apply its policies systematically and consistently across the portfolio. Monitoring is continuous, undertaken largely by the internal investment team, who assess financial and ESG information using a combination of data, meetings, research and qualitative judgement. Companies that present the highest levels of financially material ESG risk are placed on a watchlist for enhanced scrutiny, ensuring the Fund's stewardship resources are focused where they can have the greatest effect.

WYPF may choose not to invest in a particular company if it is believed management are unwilling to engage in a constructive manner of that ESG standards are irredeemable. Similarly, the fund may choose not to invest in an entire sector. For example, we have not held any thermal coal mining stocks for several years believing that the fuel is inconsistent with the transition to a lower carbon economy.

Engagement follows a structured process. When issues are identified, whether governance weaknesses, climate transition concerns, controversies or sector-wide challenges, WYPF establishes an engagement objective, identifies the most appropriate company contact, and sets realistic expectations for progress. The RI Policy stresses that engagement is intended as a two-way dialogue: WYPF communicates its expectations while seeking to understand the company's perspective and constraints. Engagements typically unfold over extended periods, sometimes years, and are assessed using a combination of management responsiveness, evidence of behavioural change and progress toward stated milestones.

Escalation occurs when engagement does not yield sufficient progress. WYPF may write to board chairs, increase the intensity of direct meetings, vote against directors or management resolutions, or support shareholder resolutions. In the rare cases where companies remain unresponsive or unwilling to address material risks, the Fund may consider reducing or exiting its exposure. Divestment is considered only when all other avenues have been exhausted and the company presents persistent and unmanageable long-term risks. The escalation pathway is clearly articulated in the RI Policy as a methodical, measured approach designed to balance patience with accountability.

Voting is a core component of WYPF's stewardship policy framework. The Fund publishes its voting policies on its website, explains the principles guiding its voting stance, and uses PIRC voting research to ensure decisions are well-informed and based on robust governance standards. While PIRC provides research and recommendations, voting decisions ultimately rest with the internal investment team, reflecting WYPF's desire to align votes closely with its engagement experience and portfolio knowledge. The Fund's publication of these quarterly voting results on its website enhances transparency and reinforces accountability for both WYPF and its providers.

Processes also apply to externally managed assets, especially in private markets and infrastructure, see Principle 5.

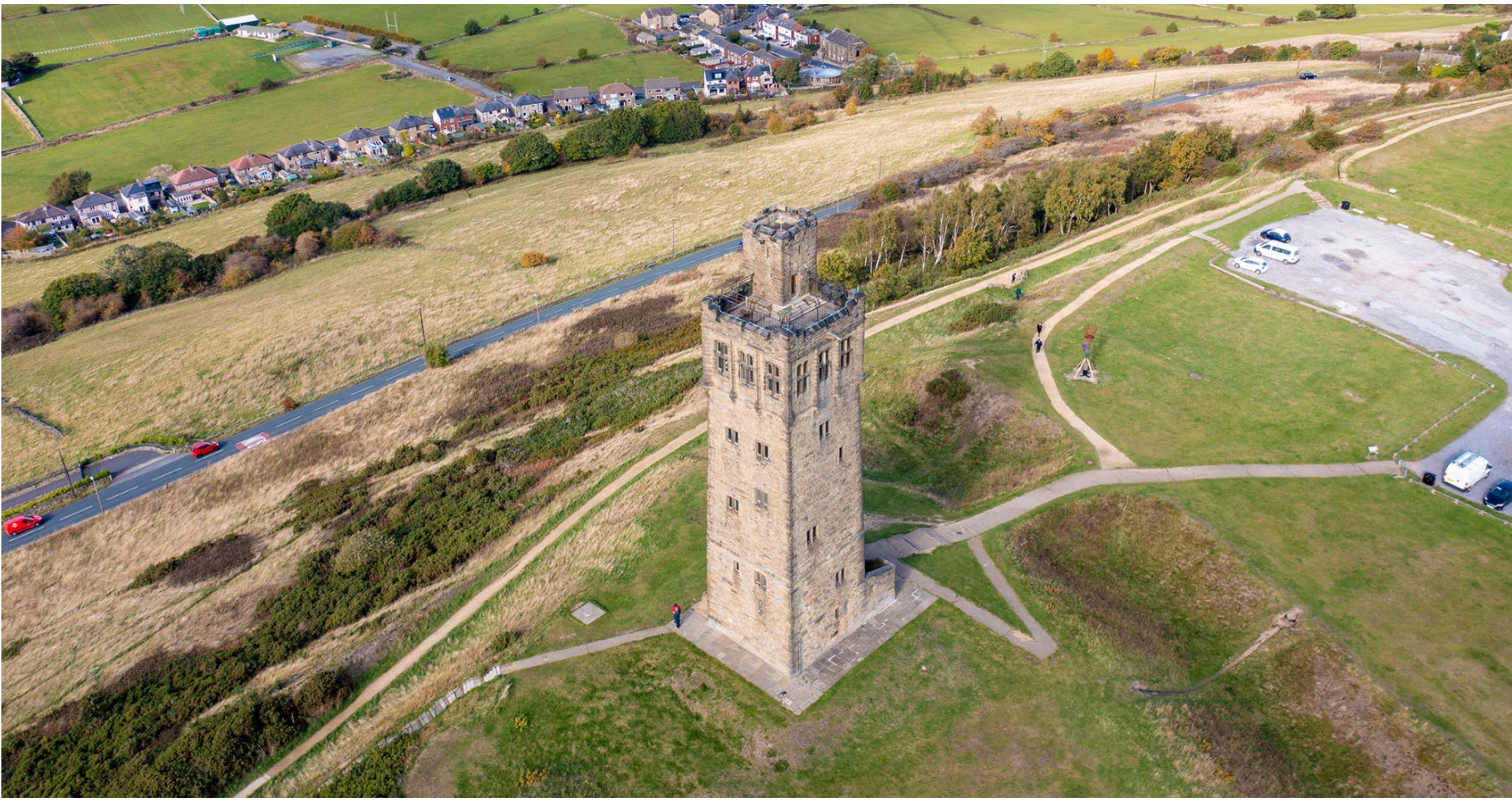
WYPF reviews stewardship policies and processes through a structured governance cycle that includes formal policy reviews, oversight by governance bodies and assurance through internal and external audit.

The ISS is reviewed at least every three years and updated more frequently when required by regulation, actuarial valuation outcomes or changes in market conditions. The RI Policy and climate-related policies are reviewed annually, incorporating new research, regulatory requirements, engagement outcomes and feedback from members and employers. These updates ensure that stewardship policies remain aligned with evolving best practice and the Fund's fiduciary responsibilities.

The Fund's governance bodies play a central role in reviewing stewardship. The WYPF Advisory Panel receives regular reporting on engagement, voting and ESG risks, providing challenge and input into policy refinement. The Local Pension Board offers an additional layer of scrutiny focused on governance, compliance and beneficiary interests. This governance structure ensures that stewardship activity is examined from multiple perspectives including investment, risk, administration and beneficiary representation.

Assurance mechanisms support this oversight. Internal audit reviews aspects of investment and stewardship processes, examining whether policies are being followed and whether controls are effective. External audit provides additional assurance over reporting and disclosure. WYPF also gains insights from external collaborations which periodically review stewardship practices and provide benchmarking against other funds.

Feedback from beneficiaries contributes meaningfully to policy review. The RI Policy notes that member and employer feedback, particularly on climate change, fossil fuel exposure and escalation expectations has shaped WYPF's reporting and the development of its stewardship and climate frameworks. This ensures stewardship remains responsive to the needs of the stakeholders the Fund exists to serve.



D. Describe how you manage stewardship-related conflicts of interest to put the best interests of clients and beneficiaries first

WYPF manages stewardship-related conflicts of interest through a structured policy framework, clear governance arrangements, and defined behavioural expectations for all those involved in the oversight or execution of investment decisions. The approach begins with the Conflicts of Interest Policy, which applies to officers, elected members, advisers and any individual participating in decision-making or stewardship activity. The policy defines a conflict as any situation where an individual's duty to the Fund might compete with a personal, financial, political or organisational interest. It requires all relevant individuals to acknowledge potential conflicts, disclose them openly to the administering authority, and agree practical measures to manage or avoid them.

Conflicts are managed proactively through a combination of mandatory declarations, routine meeting protocols, and ongoing monitoring. At the start of every meeting of the WYPF Advisory Panel or Local Pension Board, the Chair invites all attendees to declare new or existing conflicts. Any declarations are recorded in WYPF's Register of Conflicts of Interest, maintained by the Managing Director, with the most recent version made available to the Chair. This ensures there is a transparent record of interests that could influence stewardship decisions. Individuals who declare a conflict may be required to withdraw from discussions or abstain from participating in voting or engagement decisions where their impartiality could reasonably be questioned.

Additional requirements apply through external governance frameworks. Members of the Advisory Panel and Local Pension Board must comply with the City of Bradford MDC Members' Code of Conduct, while WYPF employees must meet the standards of the CBMDC Employees' Code of Conduct. These codes reinforce expectations around impartiality, declaration of interests, avoidance of improper influence, and the handling of confidential or market-sensitive information. WYPF also requires advisers and service providers, including actuaries, investment consultants, independent advisers, lawyers, custodians and third-party managers, to maintain their own conflict-management frameworks and to disclose any actual or potential conflicts as part of their contractual obligations.

Specific controls address conflicts in the internal investment team, where stewardship responsibilities are executed day-to-day. Internal portfolio managers must report all personal share transactions to the Managing Director on an ad-hoc basis and then submit a written summary of all activity every six months. These disclosures are held by the Managing Director, who in turn reports his own personal dealing activity to the Director of Finance at Bradford Council. This process ensures transparent oversight and prevents personal dealing from influencing, or appearing to influence, stewardship decisions such as voting, engagement or escalation.

The Fund's engagement processes also require careful conflict management. As active stewards, WYPF frequently engages directly with senior company representatives. To ensure that such dialogue remains objective and aligned with member interests, the RI Policy frames engagement as a structured process with clear objectives, milestones and expectations of management. Engagement decisions are based on material ESG risks, investment impact and long-term value considerations rather than personal viewpoints or external political pressures. The Fund is explicit that engagement must be constructive, evidence-based and designed to improve corporate behaviour in ways that support the Fund's ability to pay pensions.

Stewardship-specific conflicts can arise when WYPF participates in collaborative engagements, or when public or political interest groups attempt to influence voting or divestment decisions. WYPF's policies make clear that collaborative recommendations must always be evaluated against the Fund's fiduciary duties, and WYPF reserves the right to diverge from collective positions if they conflict with its long-term responsibilities to members and employers. The Fund also avoids using its voting rights to make wider political statements, judging each resolution on its specific financial and governance merits rather than on external pressure or ideological motivations.

Wider stewardship activities, such as climate engagement, escalation or participation in investor initiatives, are subject to the same conflict-management discipline. For example, where WYPF engages with companies on sensitive topics (e.g. climate transition, human rights, workforce issues), officers and Panel members are expected to consider whether any personal or organisational interests could compromise neutrality. The Fund's governance structures provide further checks: the Local Pension Board scrutinises compliance and can call officers or the Advisory Panel to account if any conflict-related concerns arise, while internal and external audit reviews provide additional assurance that policies are being applied correctly.

The conflict-management framework is periodically reviewed as part of the Fund's overall governance cycle. Annual reviews of the governance compliance statement, internal audit work on governance processes, and assessments by independent advisers all provide opportunities to update procedures and strengthen safeguards. During the most recent reporting year, no material stewardship-related conflicts were identified.

E. Describe how you maintain a dialogue with clients and/or beneficiaries

WYPF maintains an active and multifaceted dialogue with its beneficiaries, recognising that transparent communication and direct stakeholder engagement are essential to fulfilling its fiduciary responsibilities as a public-sector, defined benefit fund. The Fund has developed communication structures that allow members and employers to understand how the Fund is managed, how their benefits are administered and how stewardship and investment decisions are made in their long-term interests.

A core part of this dialogue is WYPF's commitment to clear, accessible public reporting. Beneficiaries can access the Annual Report and Accounts, the ISS, the Funding Strategy Statement, the RI report and Climate reports and Stewardship Code submission on the Fund's website. These documents explain how WYPF invests, how it manages risk, how funding levels are assessed and how stewardship activities are carried out. This transparency is reinforced by WYPF's Communications Policy, which commits the Fund to using plain English, choosing communication formats appropriate to different audiences and ensuring that members and employers receive timely, relevant and comprehensible information.

WYPF supplements formal reporting with direct engagement mechanisms that allow members and employers to raise questions and provide feedback. Members are represented at the quarterly Fund Advisory Panel meetings via both trade union and direct member representations. The Fund holds an annual meeting for members and a separate meeting for employers, both of which provide beneficiaries with the opportunity to hear directly from senior officers and Panel Chairs, pose questions and receive updates on funding, investments, governance and service developments. The members' meeting is made available online with a recording made available, ensuring broad accessibility. These events also invite beneficiaries to submit questions in advance, helping the Fund understand emerging concerns and expectations.

Dialogue with members is also supported through the My Pension online portal, which enables individuals to securely view their pension records, access annual benefit statements, update personal information and run retirement estimates. The portal provides a continuous channel of engagement, empowering members to understand their benefits, track their pension outcomes and contact the Fund as needed. Alongside this, WYPF provides factsheets, newsletters, videos, guides and regular online sessions to help members understand scheme rules, retirement options and key changes. Incoming correspondence from members, often concerning climate change, fossil fuel exposure and other ethical or geopolitical investment issues, forms a valuable feedback loop that contributes directly to refinements in WYPF's stewardship reporting and climate communication.

Employers have a parallel set of communication channels. WYPF's Employer Relations Team (ERT) maintains ongoing dialogue through dedicated Employer Pension Fund

Representatives, who act as named contacts for each employer and provide training, guidance and operational support. Large employers hold quarterly meetings with WYPF, where data quality, upcoming regulatory changes and emerging stewardship-related questions can be discussed. Employers also receive regular updates through WYPF's "Pension Matters" blog, monthly newsletters, webinars and self-service tools through the Employer Portal. These interactions allow employers to understand the implications of stewardship and investment decisions, contribution stability or long-term funding, and to share concerns or request clarification.

The Fund also seeks structured feedback from beneficiaries. Members and employers are invited to complete surveys following training sessions, annual events and online webinars. Feedback from these surveys has driven improvements in transparency and reporting, for example, clearer explanations of climate engagement milestones and strengthened disclosure of stewardship activities.

Finally, WYPF's governance structures embed beneficiary voice into oversight. The Local Pension Board, made up of employer and member representatives, provides scrutiny of administration and governance decisions and ensures that beneficiaries' interests are reflected in discussions around policy implementation, risk management and stewardship effectiveness. Its meetings, held quarterly, examine a wide range of member-relevant issues, including communications, breaches of law, training, data quality and pensions administration outcomes. This structure ensures members' interests are directly represented in the Fund's oversight framework.

Through these channels: public reporting, annual meetings, online tools, direct engagement with employers, member-focused education, structured feedback mechanisms and representative governance, WYPF maintains a continuous, multi-layered dialogue with its beneficiaries. This dialogue helps shape policy development, stewardship priorities and reporting practices, ensuring they remain aligned with the needs and expectations of the members and employers the Fund exists to serve.

Activities and Outcomes Report

Principle 1: Signatories integrate stewardship and investment to deliver long-term sustainable value for their clients and beneficiaries

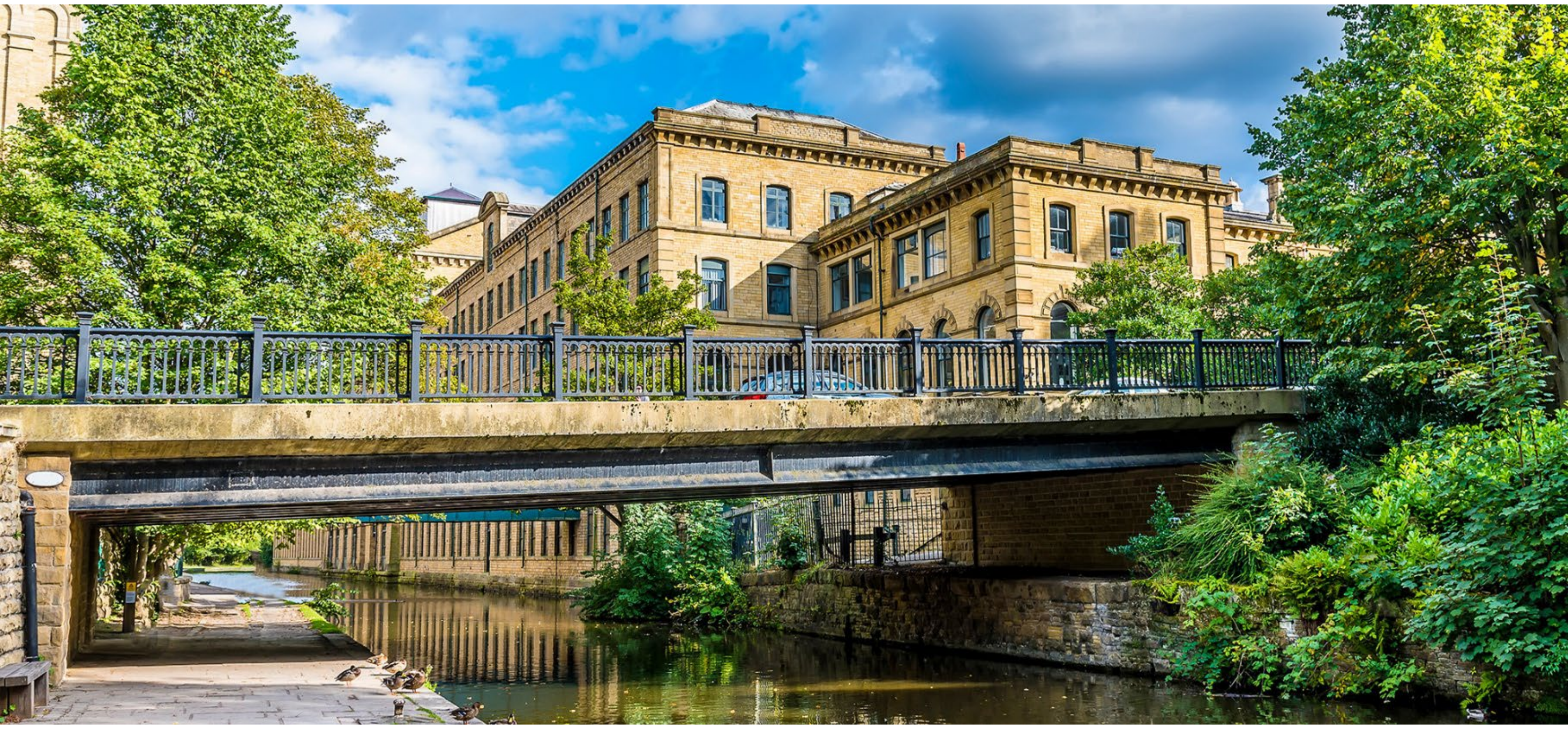
Principle 2: Signatories identify and respond to market-wide and systemic risks to promote a well-functioning financial system

Principle 3: Signatories engage to maintain or enhance the value of assets

Principle 4: Signatories actively exercise their rights and responsibilities

Principle 5: Signatories integrate stewardship considerations into their selection and oversight of external managers

Principle 6: Signatories monitor and hold to account stewardship service providers



Principle 1: Signatories integrate stewardship and investment to deliver long-term sustainable value for their clients and beneficiaries

As described in Section C of the Policy & Context Guidance, WYPF integrates stewardship and investment by embedding ESG analysis, engagement, and voting, into its investment process. The starting point for this integration is the Fund's investment beliefs, which are set out in the ISS and the RI Policy. These documents emphasise that WYPF is long-term in its attitude to risk and return, a perspective shaped by the duration of its pension liabilities, and the recognition that ESG factors are financially material to long-term sustainability. Stewardship, therefore, is not separate from investment but central to how the Fund protects capital, manages risk and enhances value on behalf of members and employers.

Integration begins with how the Fund analyses companies prior to and during investment. WYPF uses a combination of quantitative and qualitative ESG analysis, drawing on Bloomberg ESG data, broker research, the SASB materiality map and direct meetings with company management, to assess ESG risks as part of the investment case. These ESG considerations influence decisions on whether to invest, the size of positions relative to benchmark and the level of monitoring required. An emphasis on materiality allows the Fund to distinguish between ESG issues that affect long-term value and those that are less consequential, ensuring stewardship resources are targeted where they will best support sustainable outcomes. The prioritisation of individual ESG themes is decided by an assessment of the level of financial threat posed.

This investment process is strengthened by WYPF's internal management model. Because most listed equities and bonds are managed in-house, stewardship is integrated into daily decision-making. Fund managers regularly meet investee companies, maintain long-standing relationships and incorporate ESG observations from engagement directly into their investment judgements.

Stewardship integration continues through structured monitoring and engagement processes. The Fund systematically assesses company-specific risks and places firms with the highest ESG exposure on a watchlist for enhanced oversight. Engagement is undertaken when material issues are identified, and it is designed as a purposeful, long-term dialogue with clear objectives and milestones. Engagement outcomes such as improvements to governance structures, strengthened climate strategies or enhanced labour practices feed back into investment decisions. If company responses are weak or progress is slow, this insight informs escalation measures.

Voting is another mechanism through which stewardship reinforces the investment process. WYPF exercises its shareholder voting rights on all resolutions globally, using research from PIRC to support analysis while retaining full internal discretion over voting decisions. Voting judgements are made in the context of company-specific engagement history and adherence to standards, including the UK Corporate Governance Code. Where the Fund votes against management, such as opposing director re-elections, remuneration policies or audit committee chairs, it does so based on its understanding of material ESG risks and long-term value implications. In this way, voting becomes an extension of investment conviction rather than a procedural exercise.

WYPF's approach to climate change provides a clear example of stewardship and investment integration. The Fund treats climate change as an existential risk with both physical and transition dimensions, noting that scientific evidence and central bank guidance increasingly frame climate risk as financial risk. WYPF's Net Zero commitment, including the adoption of the Net Zero Investment Framework, shapes capital allocation toward climate solutions and informs engagement priorities with high-emitting companies. Tools such as S&P Trucost, the Transition Pathway Initiative (TPI) and the NZEI are used to assess emissions intensity, management quality and transition alignment. Insights from these tools influence both engagement objectives and long-term portfolio strategy, demonstrating how stewardship and investment work together to manage the financial implications of systemic climate risk.

Integration extends across asset classes, although we recognise that it is more developed in public markets, particularly equities. In fixed income, where WYPF is a creditor rather than a shareholder, ESG factors are treated as contributors to creditworthiness and resilience. In private equity and infrastructure, stewardship is implemented through pooled vehicles where WYPF participates in governance structures that scrutinise manager decisions, investment discipline, ESG integration and reporting quality. These frameworks ensure that stewardship expectations are reflected in asset classes where transparency is lower but long-term risks can be substantial. Stewardship integration for outsourced funds is discussed in Principle 5.

Engagement collaboration improves the quality of integration. We are informed by several bodies, Table 3, that extend WYPF's stewardship reach, enabling it to better address systemic issues such as climate transition, biodiversity loss, and human rights. These collaborative relationships provide research, engagement opportunities and policy insights. Moreover, aligning ourselves with other investors leverages our voice further.

The integration of stewardship into investment is supported by a transparent policy and governance framework. The ISS, RI Policy and climate reports are reviewed regularly, ensuring stewardship and investment remain aligned with regulatory expectations, evolving best practice and beneficiary views. Oversight from the Advisory Panel and Local Pension Board ensures that stewardship is scrutinised alongside financial performance and risk, reinforcing accountability and alignment with long-term beneficiary interests.

Table 3: Selected Investor bodies we have supported in 2025

Organisation / Initiative	Use & Outcome
Climate Action 100+ https://www.climateaction100.org Is an investor initiative to ensure the world's largest corporate greenhouse gas emitters take necessary action on climate change.	We use CA100+ research as the basis for selecting companies for dialogue on climate topics. We seek to support their engagement efforts.
Institutional Investors Group on Climate Change (IIGCC) https://www.iigcc.org A body enabling the investment community to drive towards a net zero carbon future.	We use IIGCC's Paris Aligned Asset Owners Framework to implement our Net Zero plan.
Net Zero Engagement initiative (NZEI) https://www.iigcc.org/net-zero-engagement-initiative An investor led initiative aimed at helping investors align investment portfolios with net zero pathways using corporate engagement.	The NZEI has broadened our engagement coverage of carbon-intensive emitters.
Transition Pathway Initiative (TPI) https://www.transitionpathwayinitiative.org A powerful tool that assesses how realistic individual companies' carbon reduction commitments are.	We are using TPI's assessments of Management and Carbon Performance to gauge the progress made by companies in our Net Zero plan.
ShareAction https://shareaction.org/ Working to mobilise global investors to use their influence to drive up labour standards, tackle climate change, protect the natural world, and improve people's health.	ShareAction has led several shareholder campaigns which we have supported including European banks' financing of fossil fuels and their Good Work Coalition focussed on Ethnicity Pay Gap & Living wage reporting.
Local Authority Pension Fund Forum (LAPFF) https://lapfforum.org/ Promoting the highest standards of corporate governance and corporate responsibility for the LGPS	LAPFF produces research and conducts engagements likely to be of interest to WYPF.
CDP https://www.cdp.net/en Is a shareholder group that runs a global database for investors, companies, cities, states, and regions to manage their environmental impacts.	CDP has led the push for enhanced disclosure on carbon, water and forestry impacts that form the basis for impact assessments.
The 30% Club https://30percentclub.org/ Is a shareholder initiative aimed at promoting broader representative of women and minorities in board and executive positions.	Since its 2010 launch, when women accounted for less than 12% of UK boards, the initiative has been instrumental in increasing female participation in senior roles. While 40% of FTSE350 boards are now female, change at the executive level has been slower.

Through this comprehensive integration combining ESG analysis, direct engagement, voting, climate alignment, collaborative initiatives and strong governance WYPF ensures stewardship is inseparable from investment. The result is an approach that supports long-term sustainable value for its members and employers, grounded in deep research, active ownership and continuous risk management.

Principle 2: Signatories identify and respond to market-wide and systemic risks to promote a well-functioning financial system

WYPF's approach to market-wide and systemic risks begins with the recognition, embedded throughout the ISS and the RI Policy, that the Fund's long-term ability to pay pensions depends on understanding risks that affect not only individual companies but entire sectors, markets and economic systems. Systemic risks such as climate change, biodiversity loss, governance failures, supply-chain fragility and macroeconomic shocks can materially threaten long-horizon investment outcomes, and WYPF's stewardship framework is deliberately designed to manage these risks in a structured and forward-looking way

Climate change is treated as one of the most significant systemic risks the Fund faces. The RI Policy explains that climate change is an "existential threat" that can affect the Fund in two main ways: through the physical risks of extreme weather, rising temperatures and climate-driven disruption, and through transition risks that threaten the viability of high-carbon business models. WYPF explicitly recognises research from central banks and regulators that frames climate risk as financial risk. In response, the Fund uses several climate-focused tools, such as S&P Trucost, the TPI, InfluenceMap, and the NZEI to assess how companies are exposed to climate change and how appropriate are their transition plans. These tools allow WYPF to identify systemic patterns of risk and incorporate them into engagement priorities.

Table 4: Example of Response to a systemic risk – Climate Change

Summary of issue	Climate risk has been identified by many investment managers as the single greatest systemic challenge that they face. The Net Zero Asset Managers initiative (NZAM) was formed in 2020 by the IIGCC as a coalition focused on promoting investment alignment with net zero emissions targets. Facing significant member withdrawals, due to political and regulatory pressure in the US, the NZAM suspended its activities in 2025.
Engagement objectives	Recognising the collaboration's usefulness, WYPF signed a public statement to affirm strong asset owner backing for a revised NZAM initiative.
Participants	The statement was co-ordinated by a LGPS pool, the Brunel Pension Partnership, and supported by more than fifty signatories, representing $3.7 trillion in AUM.
Outcome	In February 2026, NZAM was officially relaunched with more than 250 investors signing an updated Commitment Statement, that, while streamlined, remained anchored in the objectives of the Paris Agreement and the global goal of net zero emissions.

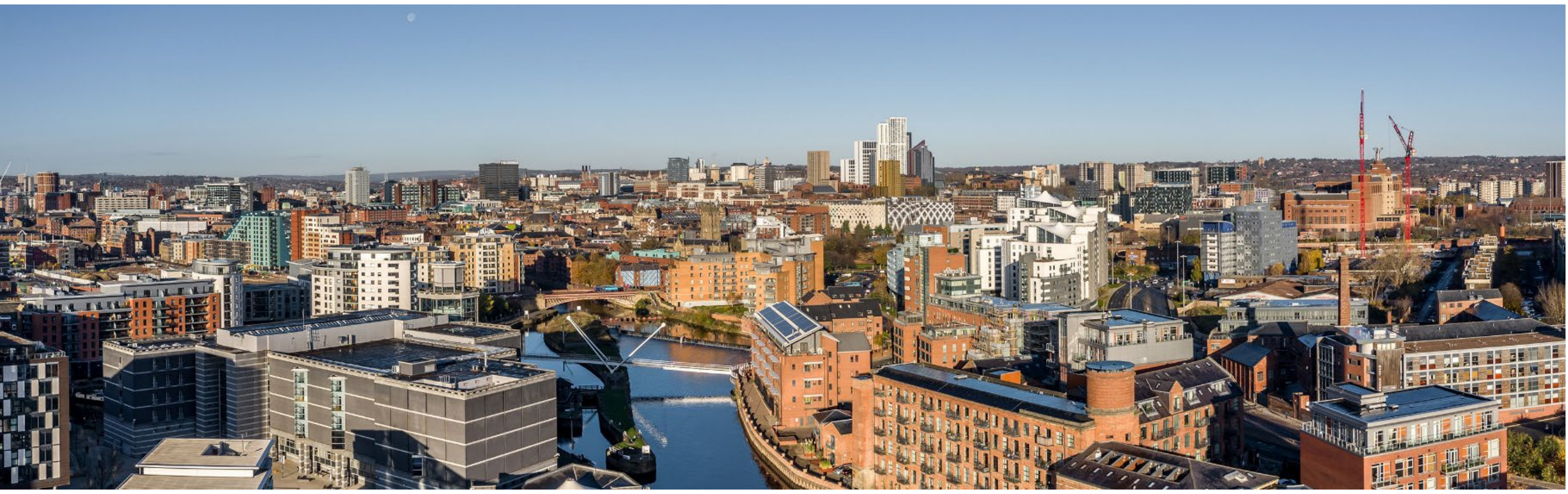
WYPF treats biodiversity decline, deforestation and resource depletion as interconnected with climate change, recognising the feedback loops that can amplify risks across global supply chains. This awareness informs engagement on agricultural practices, land use and commodity supply chains, supported by collaborative initiatives like FAIRR, which helps investors assess systemic environmental and animal-welfare risks in the global food sector.

Table 5: Example of Response to a systemic risk – Corporate Governance

Issue	In recent years, the London Stock Exchange has seen a decline in both the number of companies listed and new issuance. The government had proposed for a dilution of issuing standards as a method of reversing these trends via the Draft Audit Reform and Corporate Governance Bill. We believed that the regulation misdiagnosed the problem.
Summary of issue	In June, through the Asset Owner Council UK Corporate Governance Group, we signed a private letter sent to the Minister for Employment Rights, Competition and Markets raising concerns regarding the potential erosion of shareholder rights.
Participants	The Asset Owner Council UK Corporate Governance Group is a sub group of the UN PRI's Asset Owner Council, a collaboration of public and private pension funds with significant investments in the UK
Outcome	In response to the considerable pushback to the proposals from a variety of stakeholders, in January 2026, the government announced that it was shelving the Bill.

WYPF also addresses systemic risks through its participation in collaborative investor initiatives, as exampled in Table 5, which allow it to influence issues that no single investor could address alone and hence contribute to stability of the wider financial system. Public-policy engagement is another component of WYPF's systemic-risk response. The Fund participates in consultations, either directly or via collaboration, when regulatory intervention is needed to improve market conduct, disclosure standards or shareholder rights. This work contributes to improving the functioning of financial markets more broadly, reducing systemic vulnerabilities and promoting fairer, more transparent governance environments.

Through these combined mechanisms, WYPF identifies and responds to market-wide and systemic risks in a way that supports long-term value for beneficiaries and promotes a more stable, well-functioning financial system.



Principle 3: Signatories engage to maintain or enhance the value of assets

WYPF's engagement approach is rooted in its belief that long-term investment value is strengthened when the Fund acts as an active, informed owner. Engagement is not treated as a discrete activity but as a natural extension of WYPF's investment process, with the aim of addressing material ESG risks, improving corporate behaviour and supporting sustainable long-term returns for members and employers.

The integration of stewardship and investment enables engagement to be informed and ongoing. WYPF's internal investment team meets company representatives regularly, supported by broker research, external data and ESG analysis. These meetings help the Fund understand managers' thinking, operational challenges and the ESG factors affecting long-term sustainability. This regular dialogue provides early visibility of risks and opportunities and forms the basis for identifying when formal engagement is required. The Fund distinguishes between routine investor communication and purposeful engagement, which it undertakes only where there is a clear objective tied to long-term investment outcomes.

Table 6: An example of WYPF unilaterally engaging with management to positively influence a company

Issuer	Drax, an electricity generator held in the UK portfolio.
Summary of issue	Officers met with the company's remuneration committee to discuss proposed amendments to management compensation that included a new component that would potentially give significant uplift to the CEO's pay if the company's share price were to rise strongly in absolute terms.
Engagement objectives	While we agree that there needs to be alignment in the interests of management and shareholders, we did not agree that the proposal was appropriate either in scale or necessity. In addition, we discussed how key performance metrics could be improved to become better aligned to investor concerns.
Participants	The engagement was unilateral.
Escalation	Notwithstanding our unease, management decided to proceed with the proposals substantially unaltered. We will be voting against the proposals at the AGM'

When the Fund identifies a material issue that could affect asset value, whether a governance weakness, a climate transition concern, a controversy, or a social or supply-chain risk, it initiates a structured engagement. The prioritisation of individual ESG themes and engagements is based on an assessment of the level of financial threat posed. Engagements are designed with realistic timeframes, and with short-, medium- and long-term objectives so that progress can be assessed meaningfully over time. The Fund treats engagement as a two-way dialogue, using the opportunity both to express concerns and to understand management's perspective. This approach recognises that real improvements often require time but also that management must demonstrate a willingness to act in good faith and make credible progress.

Table 7: Example of WYPF escalating in a collaborative engagement to positively influence companies

Issuer	Amazon Inc, a multi-national tech company, is held in our North American portfolio.
Summary of the issue	Notwithstanding a commitment to respect collective bargaining rights as outlined in its Global Human Rights Principles, Amazon had attempted to interfere with rights of workers in several geographies.
Engagement Objective	Co-sign a resolution for the May 2025 AGM requesting that the company commission an independent, third-party assessment of its stated commitment to workers' freedom of association and collective bargaining rights.
Participants	We were joined a group of two dozen like-minded institutional investors in an initiative organised by Shareholder Association of Research and Education (SHARE), a Canadian activist helping investors steward their assets in ways that contribute to positive social and environmental outcomes.
Outcome	The SEC excluded the resolution proposal after it was challenged by the company and SHARE refiled a different proposal, addressing the same themes within labour rights issues in December 2025. Unfortunately, following the US government shutdown, the SEC has announced that it would let companies omit proposals without review. This again led Amazon to exclude most proposals filed this year, including SHARE's. Despite these setbacks Amazon has granted the collaboration two investor meetings in early 2026. Dialogue continues.

Escalation is an important part of WYPF's engagement process. While, the Fund prefers constructive dialogue as the most effective route to value enhancement, escalation will be used when progress is insufficient. Steps may include writing to the chair or to specific non-executive directors, raising issues in group meetings, increasing engagement intensity, voting against directors or proposals, or supporting shareholder resolutions. The Fund stresses that it remains patient but expects results; where companies do not engage constructively or fail to address material risks, escalation will be used to hold management accountable.

Table 8: Example of WYPF escalating an engagement to positively influence companies

Issuer	Shell and BP, both oil companies that we hold in the UK Portfolio.
Summary	We believe that both companies have surrendered their leading roles in the climate transition and have embraced unsustainable business models that will potentially damage shareholder value and are inconsistent with their net zero commitments.
Engagement objectives	We have been in long-standing engagements with both companies regarding their decision to focus on fossil fuel production, downplaying the importance of the energy transition. The fundamental request is for each company to explain their strategy to create value in scenarios where the demand for oil and gas products has peaked.

Participants	WYPF co-signed shareholder resolutions organised by the Follow This climate action group and several other UK and European institutional investors
Collaboration	We believed that collaboration was appropriate given the ability to amplify our voice, partnering with institutions with similar concerns.
Escalation	We consider that the decision to escalate our engagement an appropriate and a proportionate response given both oil companies have backed away from renewable energy investments in recent years.
Progress	The engagement is ongoing
Impact	At the time of writing this report, neither AGMs had yet to happen. Our hope had been that each resolution reached the 20% voting threshold that would require managements to continue to engage with investors on the topic. In March it became apparent that while Shell had put the resolution on the ballot, BP had not. We view the denial of an appropriately filed shareholder resolution as a grave infringement of shareholder rights. Absent of an appropriate explanation from the company, we will be looking to escalate further. Our dialogue with BP continues.

WYPF's approach to climate change offers a good example of engagement designed to maintain and enhance long-term value. The Fund recognises climate change as both a physical and transition risk with the potential to affect business models, supply chains and asset valuations. Tools such as S&P Trucost emissions data, the TPI and Climate Action 100+ are used to identify high-emitting or high-risk companies and assess the credibility of their transition plans. Engagement with these companies prioritises the need for robust emissions reduction strategies, capital alignment with net zero, and transparent governance structures. By pressing companies to adopt realistic and science-based transition plans, WYPF is addressing one of the most significant long-term risks to asset value.

Table 9: Example of WYPF joining a collaborative engagement to positively influence companies

Issuer	A variety of chemical and petrochemical manufacturers held in our European and North American portfolios
Summary of issue	Investor Initiative on Hazardous Chemicals (IIHC) is an investor collaboration organised by Chemsec, aiming to highlight the dangers and negate the use of PFAs ("Forever Chemicals").
Engagement objectives	Three principal aims of the engagement are: 1. Improve disclosure of the revenues and volumes derived from the sale of products containing PFAs; 2. Publish a time-bound phase-out plan of products that are, or contain, persistent chemicals. 3. Develop safer alternative solutions.
Participants	The IIHC is an investor-led collaborative engagement initiative involving 75+ participating investors and their representatives with over $23 trillion under management or advice.
Collaboration	We believed that collaboration was appropriate given the ability to amplify our voice, partnering with institutions with similar concerns.
Escalation	We have had constructive dialogue with most companies with which we have engaged and, as yet, have had no cause to escalate.

Progress of dialogue	The responses that we have received from the company will feedback into ChemSec's annual assessment of issuers.
Outcome	WYPF has been supporting the IIHC for the last three years, during which time corporate disclosures have improved, and some companies have made commitments to phase out PFAS

Collaboration amplifies the Fund's ability to influence companies in ways that protect and enhance value, see Section C and Principle 1. These collaborations enhance the Fund's ability to influence major global companies and tackle complex risks that could not be addressed effectively through bilateral engagement alone.

Stewardship also extends into private markets and alternatives through pooled governance structures as discussed in Section C and Principle 5. Finally, voting reinforces WYPF's engagement, Principle 4.

Through this combination of informed engagement, structured monitoring, targeted escalation, collaborative action, pooled oversight and consistent voting, WYPF engages in a way that is explicitly designed to maintain and enhance the long-term value of the assets entrusted to it.

Principle 4: Signatories actively exercise their rights and responsibilities

WYPF exercises its rights and responsibilities as an institutional investor through a combination of active ownership, informed engagement, disciplined voting and structured oversight. These responsibilities flow from the Fund's role as a fiduciary and from its belief that stewardship is integral to long-term value creation. The most visible expression of these responsibilities is the way WYPF votes its shares.

Voting is a fundamental right of ownership and an important mechanism for influencing corporate behaviour on behalf of beneficiaries. Voting decisions are informed by a strong understanding of corporate governance norms, company-specific ESG assessments and the history of engagement, ensuring that votes promote improved governance, accountability and long-term strategic alignment. By exercising voting rights consistently and in line with its policies, WYPF signals to companies that stewardship expectations are directly linked to investment decisions and long-term value creation.

The Fund uses PIRC as its proxy adviser but will intervene in voting decisions if believes advice is inappropriate, see Table 10. WYPF aims to vote on all resolutions at annual and extraordinary general meetings globally. In the twelve months to December 2025, the Fund voted on 18,603 resolutions across 1,310 meetings, demonstrating both the scale and consistency of its participation in corporate governance.

In asset classes where shareholder voting is not available, such as fixed income or private markets, WYPF exercises its responsibilities through due diligence, contract terms and manager oversight. In private equity, infrastructure and alternatives, oversight occurs through Northern LGPS pooling structures, see Section C and Principle 5. This allows the Fund to extend its stewardship expectations into areas where formal shareholder rights are limited, ensuring its responsibilities are discharged across the whole portfolio.

Table 10: Example of ongoing oversight to an external manager

Issuer	AGL, an Australian energy company owned in the Asia ex-Japan Portfolio
Summary of issue	We were contacted by the company before the AGM to challenge PIRC's voting recommendations against five management resolutions pertaining to its climate plan and certain governance matters.
Participants	We engaged directly with the company.
Outcome	While we agreed with PIRC that delivery has been slow, it is evident that decarbonisation efforts are accelerating and the company has a clear pathway to meet its Net Zero commitment and we are happy to support management to achieve these goals. Similarly, having had the opportunity to review the remaining issues raised we decided to change our votes to align ourselves with management.

WYPF also recognises a responsibility to contribute to the functioning of financial markets more broadly, as per Principle 2. The Fund participates in public-policy engagement when it supports improved corporate disclosure, stronger investor rights or more transparent regulation. This may occur directly or through collaborative bodies.

Finally, WYPF's rights and responsibilities are exercised through its commitment to transparency. The Fund publishes extensive information for beneficiaries and the public, as discussed in Section E. This openness supports accountability and ensures beneficiaries can understand how the Fund represents their long-term interests when engaging companies, voting shares or shaping market standards.

Through this combination of active voting, structured engagement, continuous monitoring, pooled oversight, public-policy participation and transparent reporting, WYPF exercises its rights and responsibilities in a manner aligned with its fiduciary duty. The result is a stewardship approach designed to secure long-term, sustainable value for its members and employers.

Table 11: Voting record 2025

Type	Total Votes	Support	Oppose/ Abstain	Common reasons for opposing
All Employee Schemes	81	56%	44%	
Annual Reports	2,178	48%	52%	Poor disclosure (especially of sustainability policies), failure to abide to guidelines, a lack of detail regarding accountability
Articles of Association	553	78%	22%	
Auditors	1,235	57%	43%	We support the rotation of auditors every five years; high non-audit earnings
Corporate Actions	94	77%	23%	Insufficient justification
Corporate Donation	133	87%	13%	Excessive amounts
Debt & Loans	76	39%	61%	
Directors	8,798	67%	33%	Combined CEO/ Chair roles, tenure of non-exes, Chairs to be considered independent at time of hire, votes against heads of committees where failings identified
Dividend	830	97%	3%	Dividends in excess of earnings
Executive Pay Schemes	202	15%	85%	Excessive pay, insufficient disclosure of basis of pay, LTIP may be excessively high or insufficiently long-term

Miscellaneous	914	84%	16%	
NED Fees	443	66%	34%	Excessive compensation
Non-Voting	512	4%	96%	
Say on Pay	133	2%	98%	Excessive compensation
Share Capital Restructure	114	77%	23%	Insufficient justification
Share Issue Cancellation	1,983	71%	29%	Insufficient justification
Shareholder Resolutions	324	68%	32%	
	18,603	64%	36%	

Principle 5: Signatories integrate stewardship considerations into their selection and oversight of external managers

As discussed in Principle 1, WYPF manages most of its listed assets internally. However, the fund recognises that on occasion it makes sense to use external providers, particularly in private markets, infrastructure and specialist mandates. In such instances, stewardship considerations are embedded in how the Fund selects, appoints and oversees external managers. When WYPF invests through external managers, those managers must demonstrate a stewardship approach consistent with the Fund's investment beliefs and ESG principles. ESG integration, stewardship capability and alignment with WYPF's long-term objectives are treated as core components of due diligence rather than supplementary criteria.

This integration begins during the manager selection process. Due diligence for external managers includes a thorough review of the manager's approach to ESG, including their policies, investment processes, reporting systems and ability to integrate ESG into decision-making. WYPF assesses whether a manager can identify financially material ESG factors, manage stewardship risks and report transparently on portfolio-level issues. This scrutiny ensures that the managers entrusted with Fund capital can apply the same standards of responsible ownership that WYPF applies internally.

Once appointed, external managers are subject to ongoing oversight to ensure that stewardship expectations continue to be met. WYPF monitors external managers' performance, including financial outcomes, risk management and ESG integration, through regular reporting and formal reviews. An example of this oversight is included in Table 12.

Table 12: Example of ongoing oversight to an external manager

Issuer	UK based private equity fund
Summary of issue	We were contacted by an environmental NGO, who suggested one of our private equity managers was flouting its sustainability policies having acquired a coal fired power station through its US subsidiary.
Engagement objectives	While WYPF is not an investor in the specific fund. We wanted to understand the rational behind the acquisition and the manager's explanation.
Participants	While we were notified of the issue by a NGO, we undertook the engagement unilaterally.
Progress of dialogue	Having spoken to management we concluded that the investment breaches their ESG commitment.
Outcome	The fund manager in question is likely to raise funds later this year, the breach may well influence our decision to invest in the new fund.

The Pool's collective investment vehicles provide WYPF access to investment committees, monitoring frameworks and manager evaluations that allow the Fund to assess whether stewardship expectations are being upheld. For NPEP, stewardship oversight is formalised through detailed monitoring templates that cover governance, team stability, investment discipline and ESG risk management. Likewise, in infrastructure, GLIL's governance structure gives WYPF meaningful influence over stewardship and voting.

Finally, stewardship expectations are reinforced through WYPF's policy and reporting framework. The RI Policy and ISS articulate the principles that external managers must follow, including engagement-first stewardship, long-term risk management, a commitment to responsible ownership and clear escalation routes where portfolio companies fail to address material risks. Regular reviews of these policies ensure that expectations placed on external managers evolve alongside best practice and regulatory change. Oversight from the Advisory Panel, Local Pension Board and internal audit further supports accountability and ensures that stewardship responsibilities are upheld consistently.

Through rigorous due diligence, structured ongoing monitoring, pooled oversight mechanisms and clear policy expectations, WYPF ensures that stewardship considerations are fully integrated into the selection and oversight of external managers. This alignment allows the Fund to extend its responsible investment philosophy across the entire portfolio, even in asset classes where direct ownership rights are limited, thereby supporting long-term sustainable value creation for members and employers.

Principle 6: Signatories monitor and hold to account stewardship service providers

WYPF relies on several external stewardship service providers, most notably for proxy voting research, ESG data specialists and collaborative engagement platforms, to access best-in-class thought leadership, listed in Table 3. These tools help the Fund assess systemic risks, emissions profiles, policy alignment and sector-specific ESG issues. This support is used to inform, not replace, WYPF's own judgement, and the Fund maintains structured processes to ensure that external providers act consistently with its fiduciary responsibilities and long-term investment beliefs.

WYPF maintains a frequent dialogue with these providers and evaluates the robustness, coverage and relevance of their outputs to ensure the underlying data used in ESG integration and engagement remains fit for purpose.

In 2025, WYPF joined the ESG Data Convergence Initiative (EDCI) to enable us to better assess the ESG characteristics of our private equity and infrastructure investments. Conversely, the Fund decided to discontinue the use of a specialist provider of data after deciding that its analysis was no longer required.

WYPF's oversight of stewardship service providers is reinforced by its governance and assurance framework. Together, these mechanisms ensure that WYPF monitors and holds its stewardship service providers to account. This approach ensures that all external inputs support the Fund's long-term objective of acting as a responsible, effective steward of the assets entrusted to it.