Registration Number: 00281436RK

THE PEARSON PENSION PLAN

REPORT AND FINANCIAL STATEMENTS

FOR THE YEAR ENDED 31 DECEMBER 2025

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TRUSTEE AND ADVISERS TO THE PLAN

Trustee	Pearson Pension Trustee Limited
Principal Employer (Company)	Pearson Services Limited
Participating Employers	Pearson Education Limited Pearson Management Services Limited Pearson Professional Assessments Limited Pearson Shared Services Limited TQ Education and Training Limited
Auditors	Crowe U.K. LLP
Actuary	S Leake
Actuarial and Consulting Services	XPS Pensions Group Plc
Investment Consultant	Lane Clark & Peacock LLP Aon UK Limited (Direct property, Infrastructure and Property funds, until 30 September 2025)
Bankers	National Westminster Bank Plc
Solicitors	Linklaters LLP

Investment Management

Investment Managers of the Defined Benefit Sections	Area of specialisation
Legal and General Assurance (Pensions Management) Limited	Liability driven investment mandate
Meridiam Infrastructure Managers S.a.r.l	Infrastructure
EQT Infrastructure (General Partners) LP (divested 31 May 2025)	Infrastructure
Aberdeen Infrastructure Finance GP Limited	Infrastructure
InfraRed Capital Partners Limited	Infrastructure
Allianz Global Investors GmbH	Trade Finance
Pantheon Ventures Limited	Private equity
Aegon Asset Management	Bonds
Chelsea Building Society (divested 6 March 2025)	Bonds
LaSalle Investment Management Limited	Property

Annuity providers

Legal and General Assurance Society Limited
Aviva Life & Pensions UK Limited
The Prudential Assurance Company Limited
Clerical Medical Investment Group Limited
ReAssure Limited

Investment custodians

BNY Mellon Asset Servicing Limited
Gowling WLG

Investment Managers of the Money Purchase 2003, Auto Enrolment and AVC Sections (together the Defined Contribution Section)	Area of specialisation
BlackRock Advisors (UK) Limited	Equities, corporate bonds, cash, fixed interest and index-linked gilts
Legal and General Investment Management Limited (invested 30 September 2025)	Alternative global equities
Jupiter Unit Trust Managers Limited	Alternative global equities
BNY Mellon Fund Managers Limited (invested 30 September 2025)	Alternative global equities
Columbia Threadneedle Pensions Limited	Alternative global equities and property
Newton Investment Management Limited	Diversified growth fund
Baillie Gifford & Co Limited (divested 30 September 2025)	Diversified growth fund
Schroder Unit Trusts Limited	Diversified growth fund
HSBC Asset Management (UK) Limited	Islamic global equity fund (Shariah fund)

The DC investment funds managed by the investment managers above are administered on a platform provided by Aviva Life & Pensions UK Limited (known herein as 'Aviva'). In addition to the above, the Plan also has legacy AVC investments. There are no ongoing contributions made into these funds. The investment managers of these funds are listed below.

Clerical Medical Investment Group Limited
The Prudential Assurance Company Limited
Phoenix Life Limited
The Royal London Mutual Insurance Society Limited

1. CONSTITUTION AND STRUCTURE OF THE PLAN

The Pearson Pension Plan (the Plan) is administered in accordance with the Rules in the interests of its beneficiaries by Pearson Pension Trustee Limited (the Trustee). In 2025 the General Rules for the Plan were consolidated and amended with effect from 1 December 2025. Responsibility for day-to-day management is delegated to the Chief Executive Officer (CEO) of Pearson Pension Trustee Services (PPTS) Limited, the entity which administers the Plan.

The Trustee owns 100% of the shares of PPTS Limited, which is the legal entity which employs the pensions team that manages the day-to-day administration of the Plan on behalf of the Trustee.

The Plan is organised into sections, each with its own benefit structure. From 1 December 2006, all sections were closed to new entrants with the exception of the Money Purchase 2003 (MP03) Section. On 1 September 2013, in response to legislation, the Auto Enrolment (AE) Section was also added. The Money Purchase 2003 and Auto Enrolment sections are available to new employees of companies participating in the Plan who satisfy the eligibility criteria. The Auto Enrolment Section has been designed to meet the minimum legislative requirements for eligible jobholders who meet the Auto Enrolment criteria and do not wish to join the Money Purchase 2003 Section of the Plan. In addition, the rules allow non-eligible jobholders (those who do not meet the Auto Enrolment criteria requiring employer contributions) and entitled workers (those who do not meet the criteria and for whom the employer is not legally required to contribute) to opt into the Auto Enrolment Section.

Up until 5 April 2016, the Plan was contracted out for the purpose of the Pension Schemes Act 1993 by virtue of satisfying section 9(2) of that Act. All employments to which the Plan relates were contracted-out employments for the purpose of that Act, with the exception of those members joining the Auto Enrolment Section of the Plan. This means that contracted-out members did not contribute to the State Second Pension (S2P), and that their retirement benefits are subject to the reference scheme test (RST) underpin. The Plan is also a Registered Pension Scheme under section 153 of the Finance Act 2004, the effect of which is to give tax relief on members' and employers' contributions, certain classes of investment income and on capital gains of the Plan.

From 6 April 2016, Plan members who reach State Pension age on or after that date get the new single-tier State Pension which replaced the current Basic State Pension and the State Second Pension. The introduction of the single-tier State Pension means that it is no longer possible for the Plan to contract out of the State Second Pension.

From November 2022, a salary exchange model was implemented for pension contributions for most members of the Plan, except those who opted out.

2. GOVERNANCE

The Directors of the Trustee, Pearson Pension Trustee Limited, who served during the year and those serving at the date of approval of the financial statements were:

"A" Directors
Company Nominated Directors
Michael Kearton
William Nash
Lynsey Found

Member Nominated Directors
Naomi Maradas (resigned 21 February 2026)
Louise Jones
George Graham
Joanne Russell (appointed 22 February 2026)

“A” Director Reserves
Laurie Reynolds

"B" Directors
Lynn Ruddick, Chair
James Joll
John Plender

“B” Director Reserves
Stuart Graham
Patrick Crawford

Company Secretary
Stephen Beaven

The principal employer of the Plan, Pearson Services Limited (PSL), has the power to appoint and remove the Trustee, but only with the consent of the Trustee. PSL holds all the “A” shares in the Trustee entity. These shares give it the right to appoint three “A” Directors, referred to as Company Nominated Directors (CNDs), and to remove and replace them. A further three “A” Directors, referred to as Member Nominated Directors (MNDs), are appointed by members. In respect of the three MNDs, their appointment is in accordance with the Plan’s member-nominated director procedures.

The “B” Directors hold all the B shares in the Trustee. These shares give them the right to appoint three “B” Directors and to remove and replace them. The “B” Directors, who are not current Pearson employees and are appointed with no fixed time limit, have special voting rights and if any proposals are made which they believe are not in members’ best interests, they may by unanimous decision require the Plan to be wound up.

Boards and Committees

Investment Committee

The members of the Investment Committee ("IC") are appointed by the Trustee. The IC reviews the investment performance of the investment managers (including listed investments) on a regular basis, monitors the compliance of the investment managers with the relevant guidelines and makes recommendations to the Trustee on investment matters and has some delegated authority for certain decisions.

The IC members who served during the year and those serving at the date of approval of the financial statements were:

Lynn Ruddick, Chair
James Joll (resigned as Chair 12 March 2025 and continues to be a member)
John Plender
George Graham (appointed 12 March 2025)

Alternative Investment Board and Pearson Pension Property Fund Limited (The Property Trustee)

The Pearson Pension Property Fund (the Property Fund) holds the property investment portfolio of the Plan and is administered by the Property Trustee, whose Directors are appointed by the Plan Trustee. The Property Trustee is a joint trustee of the Property Fund along with Pearson Pension Nominees Limited (previously Pearson Nominees Limited) which acts as a custodian. The Property Trustee and Pearson Pension Nominees Limited, as joint trustees, have delegated all administration of the Property Fund to the Property Trustee.

The Alternative Investment Board responsibilities include monitoring infrastructure investments made by the Plan, investing the funds contained in the Property Fund, appointing and removing the property and infrastructure fund managers, and reporting to the Plan Trustee, which is the sole beneficiary of the Property Fund.

The Directors of the Property Trustee and the Alternative Investment Board who served during the year and those serving at the date of approval of the financial statements were:

James Joll, Chair
Mark Collins (external independent member)
John Plender
Michael Kearton
Patrick Crawford (external independent member)

Audit and Risk Committee

The members of the Audit and Risk Committee are appointed by the Trustee. The committee reviews the accounting, financial reporting, internal control and risk management processes of the Plan, the Trustee and related companies, and the audit of their financial statements.

The committee members who served during the year and those serving at the date of approval of the financial statements were:

Ian Armfield, Chair (external independent member)
Michael Kearton (resigned 12 March 2025)
William Nash
Louise Jones
Lynsey Found (appointed 12 March 2025)
George Graham (appointed 12 March 2025)

Remuneration Committee

The committee reviews the level of fees (on a triennial basis) payable to directors of Pearson Pension Trustee Limited, directors of Pearson Pension Property Fund Limited and other committee members. From April 2023, the committee is also responsible for reviewing the remuneration policies of Pearson Pension Trustee Services Ltd, administrators of the Plan and a wholly-owned subsidiary of the Trustee. The level of fees is set with consideration to market rates, responsibilities, skills and experience, meetings schedule and time commitment required by members of the committees.

The committee members who served during the year and those serving at the date of approval of the financial statements were:

John Plender, Chair
Louise Jones
William Nash

Death Benefits Committee

The committee reviews death benefit cases and approves benefit payments to a dependant.

The committee members who served during the year and those serving at the date of approval of the financial statements were:

Naomi Maradas, Chair – until resignation (resigned 21 February 2026)
George Graham, Chair (appointed Chair 21 February 2026)
Stuart Graham (appointed 18 March 2026)
Stephen Beaven

Rules Committee

The committee reviews new rules and alterations to the documents that govern the Plan and sections.

The committee members who served during the year and those serving at the date of approval of the financial statements were:

James Joll, Chair
George Graham (resigned 12 March 2025)
Michael Kearton
Lynsey Found (appointed 12 March 2025)

Internal Dispute Resolution Process Committee

The committee reviews internal dispute resolution cases and approves what action is to be taken including whether any compensation is applicable.

The committee members who served during the year and those serving at the date of approval of the financial statements were:

Lynn Ruddick, Chair
Naomi Maradas (resigned 21 February 2026)
George Graham
Stuart Graham (appointed 18 March 2026)

Working parties

In addition to the committees described above, the Trustee has established a number of working parties to focus on particular subject matter areas.

Governance arrangements

The Trustee considers that good governance is essential to the management of the Plan and has established a framework to ensure standards of governance receive appropriate attention and that any changes required are addressed.

As part of its governance framework, the Trustee produces an annual action plan (the "Business Plan"), which it reviews with its professional advisers to ensure the Plan continues to be managed in accordance with its rules, and legal requirements.

The Trustee maintains a Risk Register and Business Plan to identify the key risks which may affect the Plan and the controls implemented to mitigate them and prepares an integrated risk management dashboard half yearly. These documents are monitored and reviewed on a regular basis to ensure compliance with the General Code of Practice on Internal Controls and the guidance notes, issued by The Pensions Regulator.

These governance documents enable the Trustee to monitor the arrangements, procedures, and systems in place for the management of the Plan and the security of its assets. They also provide the basis for regular review and assessment.

The Pensions Regulator has published Regulatory Guidance and the Trustee has assessed whether or not it meets all of the requirements. Each DC workplace pension scheme is required to publish a Defined Contribution Governance Statement, which is presented on page 31 of this Report and Financial Statements.

The governance of the Plan is monitored by the Plan's Audit and Risk Committee which also considers the work undertaken and any recommendations made by the Plan's statutory auditor, Crowe U.K. LLP and its other advisors.

3. MEMBERSHIP

Membership of the Plan is analysed in the following table:

	Defined Contribution Sections			Defined Benefit Sections				Plan Total
	Active	**Deferred**	**Total**	**Active**	**Deferred**	**Pensioners**	**Total**	
Members as at 1 January 2025	**2,709**	**10,924**	**13,633**	**36**	**3,378**	**8,872**	**12,286**	**25,919**
Opening / closing adjustments	(2)	(1)	(3)	-	1	1	2	(1)
New joiners	365	-	365	-	-	-	-	365
Retirements	-	(99)	(99)	-	(284)	383	99	-
Leavers with deferred benefits	(322)	322	-	(2)	2	-	-	-
Leavers taking transfers out*	-	(221)	(221)	-	(4)	(2)	(6)	(227)
Deaths	(3)	(12)	(15)	-	(33)	(238)	(271)	(286)
New dependant pensioners	-	-	-	-	-	119	119	119
Ceased dependants	-	-	-	-	-	(125)	(125)	(125)
Other leavers**	(1)	(45)	(46)	-	(31)	(22)	(53)	(99)
Members as at 31 December 2025	2,746	10,868	13,614	34	3,029	8,988	12,051	25,665

*DC transfer outs include two members (2024: 2) who had two periods of service and amalgamated their pot.
**Other leavers category includes members taking trivial commutations

The pensioners category includes all pensions in payment to spouses and dependant children of deceased members and 516 (2024: 412) Defined Contribution members on ill health, dependant pensioners and DC members who have opted for the Plan pension at retirement. These pensions are funded by the Plan and are paid through the pensioner payroll. It also includes 5,562 (2024: 5,760) pensioners that are insured under annuity policies. The Plan provides death in service benefits for 537 (2024: 517) UK employees (Life Assurance Members) who do not participate in the pension arrangements under the Plan.

4. FURTHER INFORMATION

Pension Plan funding

The Report on Actuarial Liabilities (forming part of the Trustee Report) on page 91 informs members each year about the funding position of the Plan. The Summary Funding Statement was included in the Trustee's Annual Report to Members.

The Plan Actuary last carried out an actuarial valuation as at 1 January 2024 on the funding assumptions agreed by the Trustee and the Employer. The main purpose of the valuation is to review the financial position of the Plan to enable the employer's contribution rate to be determined for funding purposes. On 18 March 2025, the Trustee finalised this valuation and the Actuary certified a Schedule of Contributions. Contributions from 1 January 2024 to 30 June 2024 were payable in accordance with the Schedule of Contributions dated 20 December 2023 and Contributions from 1 July 2024 to 31 March 2025 were payable in accordance with the Schedule of Contributions dated 18 July 2024. Contributions from 1 April 2025 to 31 December 2025 were payable in accordance with the Schedule of Contributions dated 18 March 2025. A new Schedule of Contributions was agreed on 12 January 2026 for contributions due from 1 January 2026 to 31 December 2030.

The valuation concluded that as at 1 January 2024 the market value of the Plan's assets was 109% of the amount required to cover the value of benefits on a technical provisions basis. Subsequent to the publishing of the Company's 2023 results, the Trustee completed its covenant review. Based on the Company's market position, positive outlook for the business and its robust capital structure that the Trustee considers the Company provides reliability in its ability to cover any deficit in the Plan. The Trustee therefore grades the covenant as Strong.

A reserve of £19m was included in the 1 January 2024 valuation to reflect the estimated impact of changes to benefits for current Plan members from unequal Guaranteed Minimum Pensions (GMPs) between males and females and for unequal GMP in transfer values paid to former members who transferred out. See page 88 for details.

Pearson plc has provided the Trustee with a guarantee that it will meet the payment obligations to the Plan of any of the participating employers who fail to meet them.

Pension Plan funding (continued)

A copy of the Actuarial Valuation Report as at 1 January 2024, Statement of Funding Principles, Schedule of Contributions, and Annual Report to Members 2025 are available on request from The Pearson Pension Plan, P.O. Box 9519, Sherborne, DT9 9EN. These documents are also available on the Plan's website:

www.pearson-pensions.com

The next actuarial valuation will be carried out as at 1 January 2027. It was agreed by the Trustee and Pearson plc that from the 1 January 2026 to 31 December 2026 the full amount of the future service employer contributions due to the Plan for the period in respect of members of the DB Sections and the DC Sections, would be offset against the surplus assets in the DB Sections of the Plan, in accordance with the Schedule of Contributions signed on 12 January 2026.

Previously, it was agreed that from 1 January 2024, the full amount of the employer contributions due to the Plan for the period of 6 months to 30 June 2024 in respect of members of the DB Sections and the DC Sections, were offset against the surplus assets in the DB Sections of the Plan. Further, it was agreed that the payment date of the full amount of the employer contributions due to the Plan for the period of 6 months from 1 July 2024 to 31 December 2024 would be deferred until 19 days from the end of December 2024 at the latest; these were paid on the 31 December 2024.

Employer covenant

The funding position of the Plan means that it has a relatively low level of reliance on the Pearson Plc covenant. The Trustee actively monitors the covenant of Pearson Plc and has concluded that Pearson Plc has a strong balance sheet and that in its trading update issued on 27 February 2026 it noted that, "We delivered on our goals in 2025, making significant progress in scaling AI across our products and services and building tangible momentum in our enterprise offering. The partnerships we secured with leading technology companies are a recognition of Pearson's unique role at the intersection of education, skills and workforce development, underpinned by our unrivalled strength in assessments which positions us to deliver meaningful shareholder value over the medium term. Through our unique competitive positioning, we look to the future with confidence as we meet the growing and urgent need among enterprises and learners to adapt to an AI-enabled world". The company continues to focus on expanding in the enterprise skills market and AI technologies and the share buyback programme of £350m announced last year is well underway.

The Trustee has taken into account the current situation and continues to prepare the financial statements on a going concern basis and there are no material uncertainties on going concern.

Transfers out

Where individual members of the Plan have requested transfer values to other registered pension arrangements these were calculated and verified in the manner prescribed by sections 97 and 101 of the Pension Schemes Act 1993 and subsequent amendments. Similarly, cash transfer sums have been calculated and verified in the manner prescribed by section 101AF of the Pension Schemes Act 1993 and subsequent amendments.

Transfer values and cash transfer sums reflect the various pension increases guaranteed under the Rules and they do not make any allowance for the value of discretionary benefits. In addition, with the exception of an allowance for the option for certain members of the Paramount Section to draw their benefits from age 60 without reduction, no allowance is made for member retirement options (e.g., late retirements, early retirements and trivial commutations).

Following the 1 January 2024 valuation, a review of assumptions used for calculating transfer values and cash transfer sums for members of the DB Section was completed in March 2025 by the Plan Actuary, Steve Leake, and was implemented with effect from 6 October 2025. This included changes to demographic assumptions and the discount rate used.

Preparation and audit of the financial statements

The Trustee confirms that the financial statements have been prepared and audited in accordance with regulations made under sections 41(1) and (6) of the Pensions Act 1995.

Pension increases and deferred revaluation of the Defined Benefit Sections

The Rules of each section specify the basis for pension increases. For certain sections, pensions are increased in line with terms agreed when formerly independent schemes for those members were merged with the Plan.

In general, for pensions in respect of service on or before 5 April 1997 in excess of the Guaranteed Minimum Pension (GMP), annual pension increases are based on either a fixed increase of 3% per annum or an increase based on changes in the Retail Price Index (RPI) limited to a maximum increase of 3% per annum. However, the provisions for increases vary between sections of the Plan, for instance in some cases the Trustee may have discretion to pay increases by reference to an index other than RPI. Also, in the Thames Television ("Thames") Section the increase is based on RPI for as long as it is published and not materially changed, with a minimum annual increase of 4%. The Extel Section has an uncapped RPI increase.

For pensions in respect of service after 5 April 1997, the annual increases are generally in line with RPI up to a maximum of 5%. Again, as noted above, there are exceptions including the Thames and Extel Sections and in some cases the Trustee has discretion to pay increases by reference to an index other than RPI. Members' pensions in payment for a period of less than one year at the increase date receive a pro-rated increase calculated to reflect the actual period of retirement up to the increase date. In circumstances where the RPI or CPI is negative, a pension increase of nil is awarded.

In general, GMP earned before 6 April 1988 is not increased by the Plan and GMP earned between 6 April 1988 and 5 April 1997 is increased in line with the lower of the increase in the Consumer Price Index (CPI) and 3%. GMPs ceased to accrue from 6 April 1997.

Thames Section members receive a temporary supplement pension between the age of 60 and state retirement age. This is increased on 1 October each year. The increase is based on the year-on-year increase in the basic state pension.

On 1 January 2025, the Trustee awarded pension increases in line with the Rules based on the movement in headline RPI in the year to September 2024 of 2.7% and CPI of 1.7% (pro-rated as described above).

On 1 January 2025, additional discretionary pensions were awarded for all pensioners with pensions of less than £15,000 p.a. The discretionary increase is structured to raise the capped elements of the members' pensions (excluding GMP unless Plan Rules say otherwise) to 5%. This included the seven TQ Section pensioners who left service before 6 April 1989.

On 1 October 2025, the Trustee awarded a 4.1% increase (based on the increase in basic state pension in April 2024 to April 2025) to the temporary supplementary pension element of Thames Section pensions.

Pension increases and deferred revaluation of the Defined Benefit Sections (continued)

During October 2025, an annual review of pensions in payment was carried out. On 1 January 2026, the Trustee awarded pension increases in line with the Rules based on the movement in headline RPI in the year to September 2025 of 4.5% and CPI of 3.8% (pro-rated as described above).

On 1 January 2026, additional discretionary pension increases of 4% were awarded to seven TQ Section pensioners who left service before 6 April 1989.

Deferred pensions have been revalued in accordance with applicable legislation or such higher amount as required under the Rules.

Contact information

General enquiries including those concerning the constitution and structure of the Plan can be sent directly to the Directors of the Trustee, and the CEO of Pearson Pension Trustee Services Limited via the Plan website at:

www.pearson-pensions.com/contact-us

Enquiries concerning individual member benefits should be addressed to:

Email: pensions.helpline@pearsonpensions.com
Telephone: 0800 781 1378 (+44 203 7888562 if calling from outside the UK)

Enquiries in connection with the payment of pensions should be addressed to:

Email: pensionerpayroll@pearson.com
Telephone: 0800 781 1378 (+44 203 7888562 if calling from outside the UK)

www.pearson-pensions.com/contact-us.

Alternatively, enquiries can be sent to:

The Pearson Pension Plan
P.O. Box 645
Darlington
DL1 9HP

The Trustee has adopted a procedure for the resolution of internal disputes as required by the Pensions Act 1995. A copy of the procedure is available from the Plan using the contact details above and on the Plan website.

The Trustee has responsibility for overseeing the investment arrangements of the Plan's Defined Benefit and Defined Contribution Section assets, the objectives and management of which are substantially different, and, as a consequence, have been considered separately in this report.

Statement of Investment Principles

After seeking advice from Lane Clark & Peacock LLP and consulting with Pearson Services Limited, the Trustee adopted a Statement of Investment Principles (SIP) for the Plan in accordance with section 35 of the Pensions Act 1995, which is reviewed at least annually by the Trustee. All investments since 6 April 1997 have been made in accordance with the SIP. The SIPs at 4 December 2024 and 30 September 2025 were applicable during the period covered by these financial statements. The most recent SIP dated 30 September 2025, is provided on the Plan's website www.pearson-pensions.com. Alternatively, copies can be requested using the contact information above.

The IC proactively monitors all of the Plan's investment managers. In addition to the usual quarterly monitoring, the investment managers are required to attend either the IC or the Alternative Investment Board meetings periodically. These Manager presentations provide an opportunity to discuss responsible investment along with other aspects of the manager's mandate and are considered an important aspect of these discussions. In addition to the above the IC also undertakes the following:

- When appointing new active investment managers, their approach to socially responsible investment and environmental, social and governance factors is incorporated into the selection process and referenced in their Investment Manager Agreements.

- The IC reviews the Plan's responsible investment policy, typically once a year. The latest investment manager policies are also reviewed and developments in responsible investment are discussed.

- The Plan monitors whether its investment managers are signatories of the UN Principles for Responsible Investment (PRI). The IC encourages investment managers to become PRI signatories and requests explanations where they are not.

The Trustee recognises its responsibilities as owners of capital, and believes that good stewardship practices, including monitoring and engaging with investee companies, and exercising voting rights attaching to investments, protect and enhance the long-term value of investments. The Trustee has delegated to its investment managers the exercise of rights attaching to investments, including voting rights, and engagement with issuers of debt and equity and other relevant persons about relevant matters such as performance, strategy, risks and ESG considerations.

Statement of Investment Principles (continued)

The Trustee expects the investment managers to exercise ownership rights and undertake monitoring and engagement in line with the investment managers' general policies on stewardship, as provided to the Trustee from time to time, taking into account the long-term financial interests of the beneficiaries. The Trustee expects the managers to communicate their policies on stewardship to them from time to time, and provide them with reports on the results of their engagement and voting activities at least once a year. The Trustee seeks to appoint investment managers that have strong stewardship policies and processes, reflecting where relevant the recommendations of the UK Stewardship Code issued by the Financial Reporting Council, and from time to time the Trustee reviews how these are implemented in practice.

The Trustee's view is that the fees paid to the investment managers, and the possibility of their mandate being terminated, ensure they are incentivised to provide a high-quality service that meets the stated objectives, guidelines, and restrictions of the fund. However, in practice investment managers cannot fully align their strategy and decisions to the (potentially conflicting) policies of all their pooled fund investors in relation to strategy, long-term performance of debt/equity issuers, engagement, and portfolio turnover.

Socially responsible investments

The Trustee believes that the financial impact of environmental, social, governance (ESG), and climate factors should be taken into account by investment managers when making investment decisions.

The Trustee has considered how ESG and ethical factors should be taken into account in the selection, retention, and realisation of investments, given the time horizon of the Plan and its members. The Trustee expects its investment managers to take account of financially material considerations (including climate change and other ESG considerations). The Trustee seeks to appoint managers that have appropriate skills and processes to do this, and from time to time reviews how its investment managers are taking account of these issues in practice.

The Trustee does not take into account any non-financial matters (i.e., matters relating to the ethical and other views of members and beneficiaries, rather than considerations of financial risk and return) in the selection, retention, and realisation of investments.

The Trustee has limited influence over investment managers' investment practices where assets are held in pooled funds, but it encourages its investment managers to improve their practices where appropriate within the parameters of their funds.

Socially responsible investments (continued)

The Money Purchase Sections include an equity investment option as a choice for members who wish to invest in a fund focused on ESG risks. At this time, the Trustee does not believe there are any ESG focused investment options available that meet its needs in any asset classes other than equity, but will keep this under review.

Taskforce for Climate-Related Financial Disclosure ("TCFD")

The Plan has published a report in line with the Taskforce for Climate-Related Financial Disclosure (“TCFD”) recommendations, which sets out the climate-related financial risks and opportunities that impact upon the Plan and its approach to climate-related financial disclosures. The report also demonstrates the oversight provided by the Trustee and the processes that are in place to ensure all relevant climate-related financial risks and opportunities are identified, assessed, and managed appropriately. This report can be found on the Plan website:

https://www.pearson-pensions.com/wp-content/uploads/Climate-change-report-2026.pdf

Investment Governance

The Trustee evaluates investment manager performance by considering performance over both shorter-term and longer-term periods as available. Except in closed-ended funds where the duration of the investment is determined by the fund’s terms, the duration of an investment manager’s appointment will depend on strategic considerations and the outlook for future performance. Generally, the Trustee would be unlikely to terminate a mandate on short-term performance grounds alone.

The Trustee’s policy is to evaluate each of its investment managers by reference to the manager’s individual performance as well as the role it plays in helping the Plan meet its overall long-term objectives, taking account of risk, the need for diversification and liquidity. Each investment manager’s remuneration, and the value for money it provides, is assessed in light of these considerations.

The Trustee recognises that portfolio turnover and associated transaction costs are a necessary part of investment management and that the impact of portfolio turnover costs is reflected in performance figures provided by the investment managers. The Trustee expects its investment consultant to incorporate portfolio turnover and resulting transaction costs as appropriate in its advice on the Plan’s investment mandates.

Further information relating to the Plan’s investments can be found in the investment risk note on pages 75 to 81 and in the Statement of Investment Principles on pages 92 to 102.

Defined Contribution Sections

The Money Purchase 2003 Section was introduced on 1 January 2003, and the Auto Enrolment Section was introduced on 1 September 2013 (together with Additional Voluntary Contributions known as the 'Defined Contribution Sections'). The Trustee appointed Aviva as the investment provider for the Defined Contribution Sections and members currently have a choice of investment funds from the Aviva portfolio or may choose the default lifecycle arrangement. There are also a small number of legacy Additional Voluntary Contribution (AVC) arrangements not held with Aviva under this section.

The Trustee's primary objectives for the Defined Contribution Sections are to:

- Provide an appropriate range of investment options, reflecting the membership profile of the DC Sections and the variety of ways that members can draw their benefits in retirement;

- Provide clear information on the investment options and their characteristics that will allow members to make informed choice, and;

- Provide a default investment option that the Trustee believes to be reasonable for those members that do not wish to make their own investment decisions.

Defined Contribution assets

The value of assets held with Aviva for members in these sections, including AVCs within these funds, at 31 December 2025 was as follows:

Fund	MP03 & AE Market Value £'000	AVC Market Value £'000	**Total Market Value £'000**	**%**
Pearson Pension Plan Bespoke Global Equity	534,379	11,028	**545,407**	**63.9**
Blended Multi-Asset	119,501	2,687	**122,188**	**14.3**
Short Duration Credit	52,076	1,278	**53,354**	**6.2**
Annuity Targeting	51,014	1,063	**52,077**	**6.1**
BlackRock World (ex-UK) Equity Index	33,180	3,301	**36,481**	**4.3**
BlackRock Institutional Sterling Liquidity	12,920	1,527	**14,447**	**1.7**
BlackRock UK Equity Index	12,261	672	**12,933**	**1.5**
Jupiter Ecology	5,217	127	**5,344**	**0.6**
Blended Index Linked Gilt	3,274	296	**3,570**	**0.4**
BlackRock Over 15 Year Corporate Bond Index Tracker	2,462	179	**2,641**	**0.3**
CT Pensions Property	2,250	72	**2,322**	**0.3**
BlackRock Over 15 Year Gilt Index	1,189	28	**1,217**	**0.1**
Blended Global Equity*	940	67	**1,007**	**0.1**
CT Responsible Global Equity	562	22	**584**	**0.1**
HSBC Islamic Global Equity Index	516	18	**534**	**0.1**
BNY Global Equity*	158	-	**158**	**0.0**
	831,899	22,365	**854,264**	**100.0**

*These funds were not included in the Plan's approved funds as at 31 December 2025. The funds remained open in error and a total of 45 members continue to be invested in these closed funds at the end of the year. Please see page 38 for further information.

The aggregate amounts of AVC investments are as follows:

	2025 £'000	2024 £'000
Aviva	**22,365**	19,116
Clerical Medical Investment Management	**141**	175
Prudential	**106**	101
Other insurance companies	**152**	173
	22,764	19,565

Default lifecycle arrangement

For those members of Defined Contribution Sections that do not choose to make active investment choices, the Plan provides a default lifecycle arrangement, which aims to ensure that members funds are invested into appropriate funds based on the number of years until their selected retirement date. The vast majority of DC members are invested through the default lifecycle arrangements.

There are three default lifecycle arrangements available:, the Drawdown lifecycle, the Cash lifecycle, and the Annuity lifecycle. All of these arrangements are available for members to select in order to target their preferred retirement plan.

The Drawdown lifecycle involves a phased switching process whereby funds are initially invested in the Blended Global Equity Fund (from September 2025 the Pearson Pension Plan Bespoke Global Equity fund). Starting 15 years from retirement, this holding is gradually switched.

From 30 September 2025, the combination of funds applicable to the phased switching of the Drawdown lifecycle option arrangement includes the Pearson Pension Plan Bespoke Global Equity fund, the Blended Multi-Asset Fund, the Annuity Targeting Fund, the Short Duration Credit Fund and the Sterling Liquidity Fund.

The other lifecycle arrangements invest in the same funds as the Drawdown lifecycle until 5 years from retirement.

The Plan's BlackRock Sterling Liquidity Fund is also deemed a default for governance purposes from May 2020, following the redirection of all property fund contributions, due to a suspension of the Columbia Threadneedle (formerly Threadneedle) Pensions Property Fund. A few members still remain in the fund as at 31 December 2025.

Further details of the default lifecycle arrangements can be found within the Chair's Defined Contribution Governance Statement, on page 31.

Administration and investment management fees

The administrative expenses associated with the operation of the Defined Contribution Sections are incurred by the Defined Benefit Sections and disclosed within the Defined Benefit Sections of the Fund Account on page 57, with the exception of Aviva's administration service costs which are borne by the members. The Plan Actuary has incorporated an estimation of the administrative costs, the life assurance provision, and the RST underpin associated with this section within the funding arrangements for the Plan.

The Trustee continues to regularly review the member-borne costs and charges charged by Aviva to obtain good value for members invested in the Defined Contribution Sections (which include Defined Benefit members AVCs).

The member-borne charges for the Plan's default lifecycle arrangement continue to be substantially below the government charge cap of 0.75% per annum for default investment funds in automatic enrolment schemes. Details of costs and charges can be found on page 39.

Defined Contribution Sections performance

The Trustee monitors the performance of the funds provided by Aviva with the assistance of Lane Clark & Peacock LLP (LCP). The IC investigates significant departures from benchmarks with investment managers. Details of fund performance are set out in the table below:

Fund Name	1-year to 31 December 2025			5-years (p.a.) to 31 December 2025		
	Fund Performance	Benchmark Performance	Difference	Fund Performance	Benchmark Performance	Difference
Passive funds	%	%	%	%	%	%
Bespoke Global Equity	**13.7**	**13.3**	**0.4**	**11.1**	**10.7**	**0.4**
Annuity Targeting*	**1.4**	**1.8**	**(0.4)**	**N/a**	**N/a**	**N/a**
BlackRock World ex UK Equity Index	**13.9**	**14.2**	**(0.3)**	**12.8**	**13.0**	**(0.2)**
BlackRock UK Equity Index	**22.0**	**23.0**	**(1.0)**	**11.1**	**11.3**	**(0.2)**
Blended Index Linked Gilt	**2.0**	**2.4**	**(0.4)**	**(3.0)**	**(3.0)**	**-**
BlackRock Over 15 Year Corporate Bond Index	**5.8**	**6.2**	**(0.4)**	**(7.5)**	**(7.3)**	**(0.2)**
BlackRock Over 15 Year Gilt Index	**3.6**	**3.6**	**-**	**(12.2)**	**(12.1)**	**(0.1)**
HSBC Islamic Global Equity	**13.2**	**13.0**	**0.2**	**14.8**	**14.9**	**(0.1)**
Active funds						
Blended Multi-Asset	**13.3**	**4.3**	**9.0**	**3.5**	**3.1**	**0.4**
Short Duration Credit	**6.7**	**4.3**	**2.4**	**2.6**	**3.1**	**(0.5)**
BlackRock Sterling Liquidity	**4.4**	**4.3**	**0.1**	**3.1**	**3.1**	**-**
Jupiter Ecology	**11.0**	**13.9**	**(2.9)**	**6.2**	**8.3**	**(2.1)**
CT Pensions Property	**5.4**	**5.1**	**0.3**	**3.8**	**3.3**	**0.5**
CT Responsible Global Equity	**3.2**	**13.2**	**(10.0)**	**5.9**	**13.0**	**(7.1)**

Source: Aviva and underlying managers. Returns of passive funds are shown net of the fund investment management charge as paid by members, but are not net of Aviva's platform charge. Benchmark returns are not adjusted. For the Blended Multi-Asset Fund, Short Duration Credit Fund and Sterling Liquidity Fund the SONIA (i.e. cash) has been used for the benchmark. *The first price available for this fund was at 2 July 2021, therefore 5 year performance is not yet available.

Defined Contribution Sections performance (continued)

On the whole, the passive funds have tracked their benchmark returns closely over the longer term. The Jupiter Ecology Fund and CT Responsible Global Equity Fund have underperformed compared to their performance targets. These underlying manager funds underperformed against a market backdrop which presented challenges for funds with structural ESG exclusions or environmental themes. Environmental and ESG-aligned funds are sensitive to policy announcements, interest rate expectations and investor risk appetite. The funds have underperformed compared to their benchmarks due to their thematic-positioning and exclusions inherent in their mandates as opposed to poor stock selection.

Defined Benefit Sections

Following the 2024 valuation, the Plan remains fully funded on a technical provisions basis.

Investment objective and strategy

The Trustee's primary objective for the Defined Benefit Sections is to ensure that the benefit payments are met as they fall due. In addition to this primary objective, the Trustee has the following objectives:

- An overall objective to invest the Plan’s assets in such a way that sufficient money is available to meet the liability to provide benefits to the members of the Plan into the future. This includes, where possible and agreed with the Principal Employer, discretionary increases to pensions in payment in excess of the guarantees in the Plan Rules, so that total pension increases over time broadly aim to protect against cost of living increases.

- As a precondition of the above, the Trustee will endeavour to invest the Plan’s assets to achieve returns in excess of the growth in the liabilities, whilst maintaining a prudent approach to meeting the Plan’s liabilities.

Investment objective and strategy (continued)

Asset allocation for the Defined Benefit Sections is considered regularly by the Trustee and reviewed in detail following each actuarial valuation. The Trustee divides the assets of the Plan into two sections; the Insurance Portfolio and the Main Portfolio which are composed as follows:

- The Insurance portfolio consists of assets which are held in the form of insurance contracts matching a portion of the liabilities of the Plan. The insurer pays the Plan an amount equal to the pension payment in respect of the members underlying the policy. These insurance contracts are assets of the Plan and the pension liability remains within the Plan.

- The Main portfolio consists of all Plan assets outside the Insurance portfolio. The Main portfolio is composed of liability matching and return seeking assets:

  - Liability matching assets are assets which produce cash flows that can be expected to match the cash flows for a proportion of the membership. The matching assets include bonds, inflation linked property and infrastructure. Liability driven investment is a key component of the Plan's matching assets as it allows it to match a higher proportion of the expected liability cash flows.

  - Return seeking assets are invested with a long-term horizon to generate the returns needed to provide the remaining expected cashflows for the beneficiaries. This portfolio is invested in a diversified portfolio of return seeking assets. The return seeking assets are expected to consist of an allocation to trade finance, infrastructure, private equity and property.

Strategic objectives of the Plan

Given the Plan's strong funding position, the Plan's primary focus has been to invest in matching assets and control risk through the allocation of investments. The resulting strategy is intended to lead to a low probability that the Plan will require further contributions from the Plan's sponsor.

In line with this strategy, in November 2015 the Plan implemented a liability driven investment mandate, for which a Qualifying Investor Alternative Investment Fund (QIAIF) was established, managed by a subsidiary of Legal & General Investment Management (LGIM). The objective of this fund is to reduce interest rate and inflation risks, using cash flow matching and risk control.

Strategic objectives of the Plan (continued)

Continuing with this strategy, and additionally to hedge longevity risk, the Plan purchased two separate buy-in policies with Aviva Life & Pensions UK Limited (Aviva Life) and Legal and General Assurance Society Limited (LGAS) in the second half of 2017. An additional number of pensioners were bought in to the LGAS buy-in contract in February 2019. These policies were purchased to ensure the Plan has sufficient cashflows to match the benefit payments of the insured members.

Defined Benefit assets

The Plan's asset allocation of the Defined Benefit Sections at 31 December 2025 is shown in the investment risk table on page 77:

The Plan's assets are divided between a number of investment managers, a large proportion of which is allocated to liability driven investment. The Trustee determines investment guidelines for each investment manager and places restrictions on the personnel who can authorise the transfer of cash and the bank accounts to which funds can be transferred. The asset allocation policy is reviewed regularly to ensure that it remains appropriate to the Plan.

During the year, the Plan's investments were managed by the professional investment managers listed on pages 3 and 4. The property investments of the Plan are held within the Pearson Pension Property Fund and managed by LaSalle Investment Management.

The Trustee employs Bank of New York Mellon (BNY Mellon) as the Plan's global custodian and monitors its ongoing suitability on a periodic basis. All professional custodian companies, general partners and solicitors listed on pages 3 and 4, hold secure title to the investments managed by each investment manager.

The investment managers are remunerated by fees based on the value of the assets under their management. All of the Plan's Defined Benefit pooled investment vehicles, with the exception of the liability driven investment and corporate bonds, also have a performance fee built into their unit prices.

Return on Defined Benefit investments

The short-term and medium-term investment returns for the Plan's total Defined Benefit investments (excluding the insurance policies) for periods ended 31 December 2025, which LCP have calculated based on information provided by BNY Mellon, were:

	One year	Three years
	%	% p.a.
The Plan actual	3.9	(1.0)
The Plan benchmark*	5.1	1.6

*The 'Plan actual' returns are calculated on a time-weighted basis, considering the change in value of assets and the weightings of each asset class over the period, taking account of cash flows.

The Plan's return seeking assets achieved a return of 6.9% over the last year, compared with a benchmark return of 7.7%. The liability matching assets return over the year was 3.5% compared to a benchmark return of 4.7%. The majority of the liability matching assets are index linked and are designed to match liability cashflow movements. The liabilities of the Plan have also reduced in line with the market conditions; therefore, the performance of the assets has not affected the Plans funding levels.

Statement of responsibilities with respect to the financial statements and the Schedule of Contributions

The financial statements are the responsibility of the Trustee. Pension scheme regulations require the Trustee to make available to Plan members, beneficiaries, and certain other parties, audited financial statements for each Plan year which:

- show a true and fair view of the financial transactions of the Plan during the year and of the amount and disposition at the end of that year of the assets and liabilities, other than liabilities to pay pensions and benefits after the end of the Plan year, in accordance with applicable law and United Kingdom Accounting Standards (United Kingdom Generally Accepted Accounting Practice), and

- contain the information specified in The Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, including a statement whether the Financial Statements have been prepared in accordance with the Statement of Recommended Practice 'Financial Reports of Pension Schemes', and

- are prepared on a going concern basis unless it is inappropriate to presume that the Plan will not be wound up.

The Trustee has supervised the preparation of the financial statements and has agreed suitable accounting policies, to be applied consistently, making any estimates and judgements on a prudent and reasonable basis. The Trustee is also responsible for making available certain other information about the Plan in the form of an Annual Report.

The Trustee is responsible under pensions legislation for ensuring that there is, prepared, maintained, and from time to time revised i, a Schedule of Contributions showing the rates of contributions payable to the Plan by or on behalf of the employer and the active members of the Plan and the dates on or before which such contributions are to be paid. The Trustee is also responsible for keeping records in respect of contributions received in respect of any active member of the Plan and for adopting risk-based processes to monitor whether contributions are made to the Plan by the employer in accordance with the Schedule of Contributions. Where breaches of the Schedule occur, the Trustee is required by law to consider making reports to The Pensions Regulator and the members.

The Trustee also has a responsibility for ensuring that adequate accounting records are kept and for taking such steps as are reasonably appropriate to safeguard the assets of the Plan and to prevent and detect fraud and other irregularities, including the maintenance of an appropriate system of internal control.

For and on behalf of Pearson Pension Trustee Limited.

Lynn Ruddick, Chair
Date:

1. Introduction

The Pearson Pension Plan (the "Plan") is an occupational pension scheme providing defined contribution ("DC") benefits. Governance requirements apply to DC pension arrangements, to help members achieve a good outcome from their pension savings.
The Trustee of the Plan is required to produce a yearly statement to describe how governance requirements have been met in relation to:

- the investment options in which members' funds are invested (this means the default arrangements and other funds members can select or have assets in, such as "legacy" funds);
- the requirements for processing financial transactions;
- the charges and transaction costs borne by members;
- the net investment returns for each investment option members were able to select during the Plan year;
- an illustration of the cumulative effect of these costs and charges;
- a 'value for members' assessment; and
- Trustee knowledge and understanding.

This statement covers the period from 1 January 2025 to 31 December 2025.

2. The default investment arrangements

The Plan has the Auto Enrolment ("AE") section, which is used as a Qualifying Scheme for auto-enrolment, and the Money Purchase 2003 ("MP03") section, which is not. Together these are the Defined Contribution ("DC") Sections of the Plan ("DC Sections"). Members who do not opt into or are not eligible for the MP03 section are auto-enrolled into the AE section. Members of both sections are given the same investment choices and have the same default investment strategies.

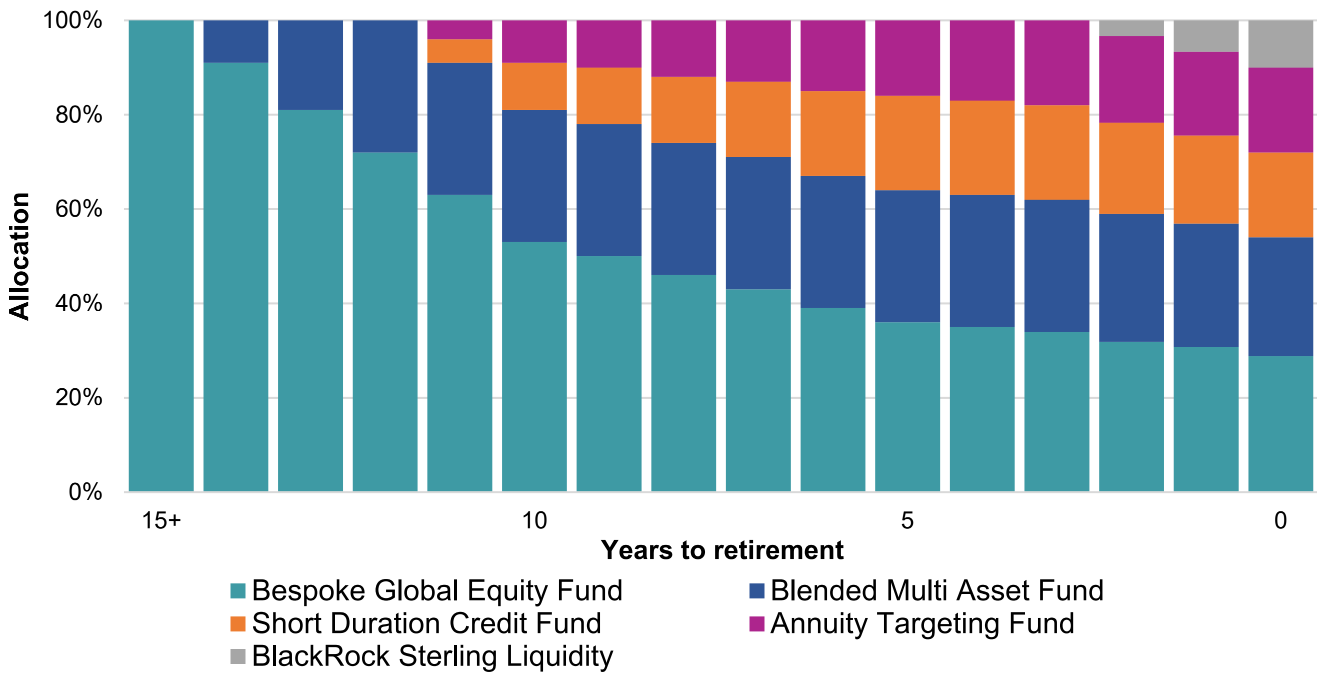
Some members of the DC Sections of the Plan make their own investment choices from the range of investment options made available by the Trustee, but those who do not make an explicit choice regarding the investment of their funds are placed automatically into a default arrangement. After taking advice, the Trustee decided to make the default arrangement a lifecycle strategy, which means that members' assets are automatically moved between different investment funds within the default lifecycle arrangement as they approach their target retirement date.

There are three separate default lifecycle strategies: the 'Drawdown lifecycle', the 'Cash lifecycle', and the 'Annuity lifecycle'. Details of how member contributions are invested into the different default lifecycle strategies are set out below.

Where an explicit choice has not been made by the member, contributions are invested into the 'Drawdown lifecycle'. The Drawdown lifecycle is also the default arrangement for members who make Additional Voluntary Contributions ("AVCs"). This applies to all existing members that have assets invested in the MP03 and AE sections that are targeting drawdown and also new members. This does not apply, however, to AVC benefits where the member has no assets already invested in the Drawdown lifecycle through the MP03 or AE sections, or is a defined benefit ("DB") member with AVC benefits, but no assets in these aforementioned DC Sections.

The Trustee is required to calculate the percentage of the Plan assets within the default arrangements allocated to key asset classes. In line with DWP's guidance, this asset allocation is shown for different ages as at the Plan year end.

The asset allocations in the years leading up to retirement for the Drawdown lifecycle are shown below:

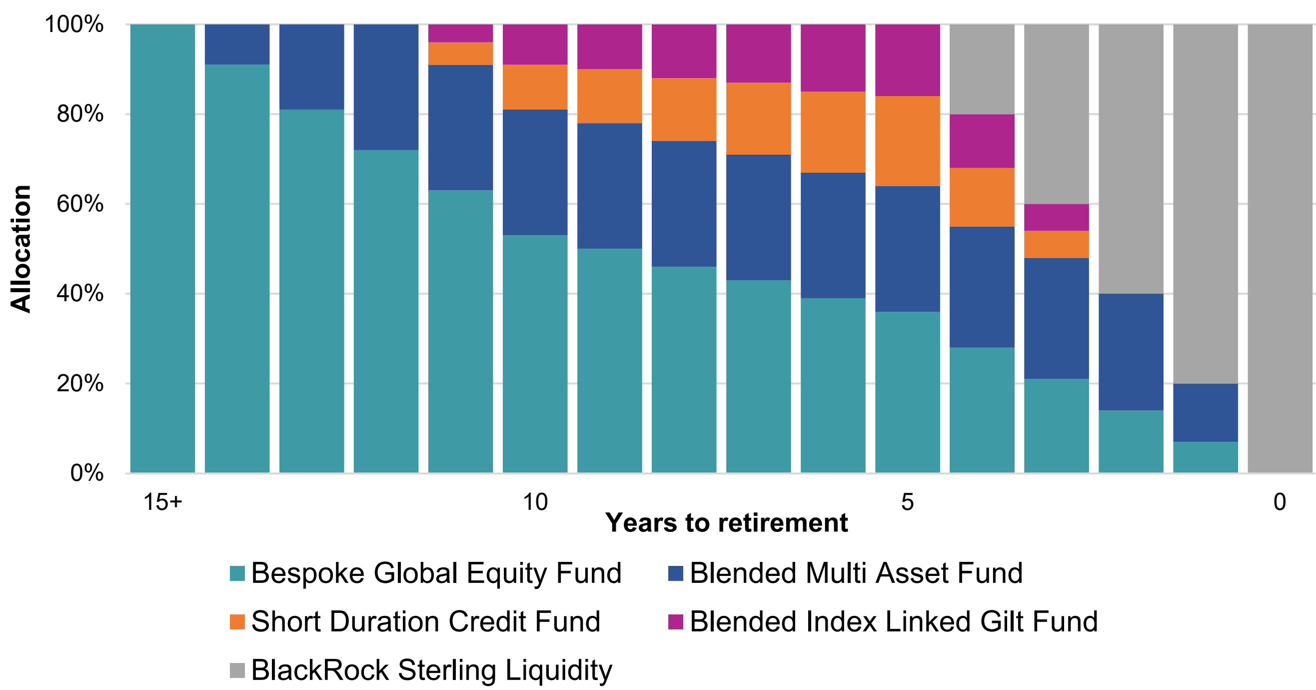


Drawdown lifecycle

Asset class	Allocation 25 y/o %	Allocation 45 y/o %	Allocation 55 y/o %	Allocation at retirement %
Cash	-	-	2.5	12.3
Corporate bonds (UK and overseas)	-	-	23.5	24.7
UK government bonds	-	-	13.0	18.0
Overseas government bonds	-	-	2.0	1.8
Listed equities	100.0	100.0	56.8	41.2
Private equity	-	-	-	-
Infrastructure (direct)	-	-	-	-
Property (direct)	-	-	-	-
Private debt	-	-	-	-
Other	-	-	2.4	2.1

Totals may not sum due to rounding.
(y/o: years old)

The Cash lifecycle is the default lifecycle option for existing members with AVC benefits within the Plan who do not have assets invested in the Drawdown lifecycle, or are DB members with AVC benefits who do not have assets invested in the MP03 or AE sections of the Plan. The strategy is also open for members to select if they wish to. The asset allocations in the years leading up to retirement for the Cash lifecycle are shown below:

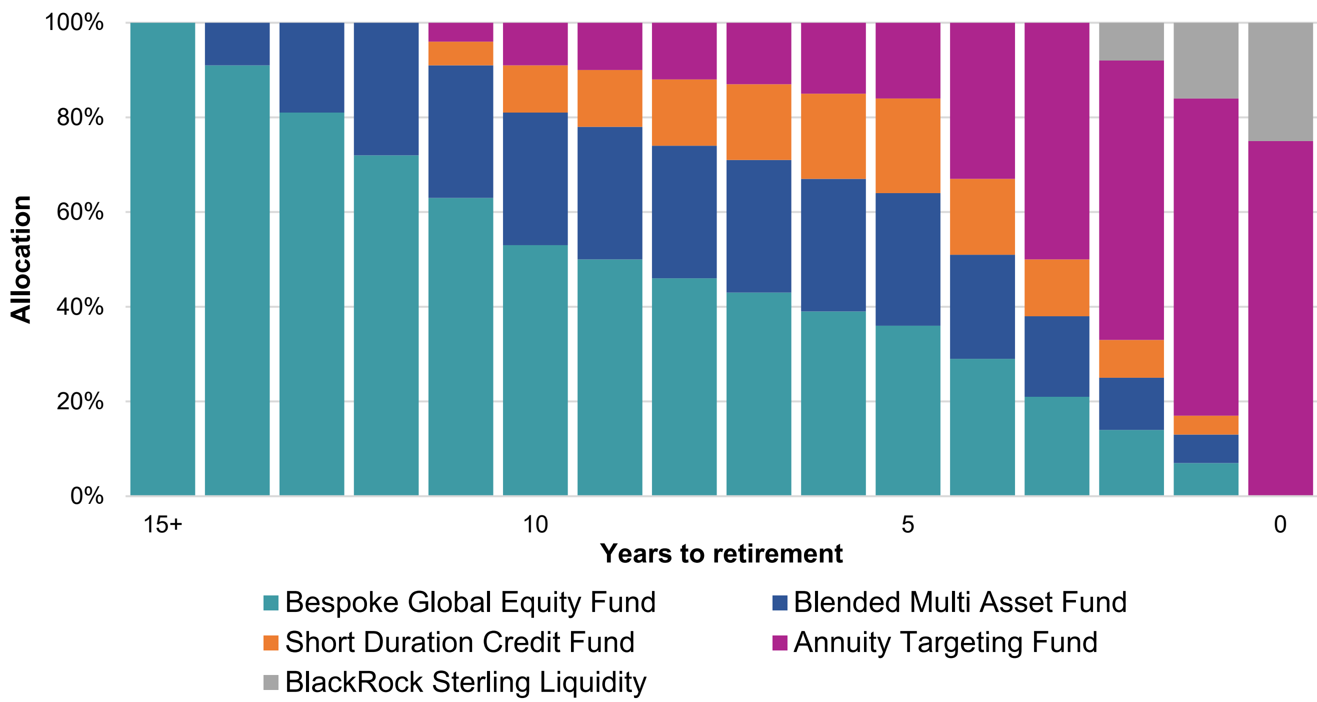


Cash lifecycle

Asset class	Allocation 25 y/o %	Allocation 45 y/o %	Allocation 55 y/o %	Allocation at retirement %
Cash	-	-	2.5	100.0
Corporate bonds (UK and overseas)	-	-	23.5	-
UK government bonds	-	-	13.0	-
Overseas government bonds	-	-	2.0	-
Listed equities	100.0	100.0	56.8	-
Private equity	-	-	-	-
Infrastructure (direct)	-	-	-	-
Property (direct)	-	-	-	-
Private debt	-	-	-	-
Other	-	-	2.4	-

Totals may not sum due to rounding.
(y/o: years old)

The Plan also has a legacy default lifecycle arrangement, the 'Annuity lifecycle', which the assets of a number of members close to retirement were transferred into as part of the last investment strategy review. The strategy is also open for members to select if they wish to. The asset allocations in the years leading up to retirement for the Annuity lifecycle are shown below:



Annuity lifecycle

Asset class	Allocation 25 y/o %	Allocation 45 y/o %	Allocation 55 y/o %	Allocation at retirement %
Cash	-	-	2.5	25.0
Corporate bonds (UK and overseas)	-	-	23.5	-
UK government bonds	-	-	13.0	75.0
Overseas government bonds	-	-	2.0	-
Listed equities	100.0	100.0	56.8	-
Private equity	-	-	-	-
Infrastructure (direct)	-	-	-	-
Property (direct)	-	-	-	-
Private debt	-	-	-	-
Other	-	-	2.4	-

Totals may not sum due to rounding.
(y/o: years old)

The Trustee is responsible for investment governance, which includes setting and monitoring the investment strategy for the default lifecycle arrangements.

Details of the objectives and the Trustee's policies regarding the default arrangements can be found in a document called the 'Statement of Investment Principles' ("SIP"), which can be found on pages 92 to 102.

The objective of the main default lifecycle arrangement, as stated in the SIP, is as follows: *"The objective of the Drawdown lifecycle is to generate returns above inflation whilst members are some distance from retirement, but then to switch automatically and gradually to investments that more closely match the intentions of members."*

The objectives of all of the default lifecycle arrangements, as stated in the SIP, are as follows: *"The aim and objective of all the default lifecycle strategies is to provide members with the potential for higher levels of growth during the accumulation of their retirement savings through exposure to equity and diversified growth funds ("DGFs") and then to gradually diversify their investments in the years approaching retirement. The asset allocation throughout the default lifecycles and the phasing of the gradual switching of investments aims to take into account members' greater capacity for risk early on and reduced capacity for risk closer to retirement. Each option is designed to reflect the Trustee's belief that most members in that strategy will take their benefits in the specified form."*

In the initial growth phase, the lifecycles are invested to target a return significantly above inflation. In the 15 years before retirement, they then switch gradually into less risky assets, with the asset allocation at retirement being designed to be appropriate for members wishing to access drawdown (the Drawdown lifecycle), take their pot as cash (the Cash lifecycle) or purchase an annuity at retirement (the Annuity lifecycle).

The default lifecycle arrangements are described on page 23, and each of the asset allocation tables can be found at https://www.pearson-pensions.com/library/#booklets in the "Annuity lifecycle, Cash lifecycle and Drawdown lifecycle documents.

The Trustee considers these approaches to be in the best interest of relevant members. The default lifecycles meet the requirements for environmental, social, and governance ("ESG") considerations set out in the SIP.

The BlackRock sterling liquidity fund is also considered to be a default due to the redirection of member contributions in 2020 without explicit member consent during the temporary suspension of dealing of the Columbia Threadneedle (formerly Threadneedle) Pensions property fund. The objective of this fund is to maximise current income consistent with the preservation of capital and liquidity through the maintenance of a portfolio of high-quality short-term "money market" instruments and to achieve an investment return above its benchmark (the Sterling Overnight Index Average). This fund is invested 100% in cash/ money market instruments. This allocation remains consistent regardless of members' age or time to retirement.

The Pearson Plan bespoke global equity fund is also considered to be a default. This is because the Pearson Plan blended global equity fund was closed in September 2025 and self-select members in the fund were switched without explicit consent to the Pearson Plan bespoke global equity fund. The objective of this fund is to provide returns consistent with the composite benchmark by investing in a range of funds that provide exposure to global equities, including emerging markets. This fund has a 100% allocation to listed equities. This allocation remains consistent regardless of members' age or time to retirement.

On a quarterly basis, the performance of the funds after charges (which can be found on pages 25 and 26) comprising the default arrangements are reviewed by the Investment Committee. Throughout 2025, investment returns for passive funds have generally tracked their respective benchmarks and have performed in accordance with their stated objectives. The performance of the active funds within the lifecycle arrangements has been more varied. Where longer term performance is materially behind objectives, the Investment Committee has investigated this with the Plan's investment consultants and investment managers in order to establish if any further action is necessary. The reviews that took place during the year concluded that the default lifecycle arrangements were performing broadly as expected. All members in the lifecycles experienced positive returns over 2025.

The default arrangements are formally reviewed to assess their ongoing suitability at least every three years or immediately following any significant change in investment policy or membership profile. The last membership demographics analysis and strategic review of the default arrangements was carried out on 16 March 2026. The performance and strategy of the default arrangements were reviewed to check whether investment returns (after deduction of charges and costs) have been consistent with the aims and objectives as stated in the SIP, and to check that they continue to be appropriate given the Plan’s risk profiles and membership. Based on the membership analysis and advice provided by its investment advisers, the Trustee concluded that all the default arrangements remain appropriate and there are no immediate actions that are necessary to take.

3. Core financial transactions

The Trustee has a specific duty to secure that core financial transactions (including the investment of contributions, transfer of member assets into and out of the Plan, transfers between different investments within the Plan and payments to and in respect of members) relating to the DC Sections are processed promptly and accurately.

The Trustee delegates responsibility for this to the pensions team and the Plan’s DC provider, Aviva. The agreement the Trustee has in place with Aviva incorporates specific service level agreements (“SLAs”) which include targets for the accurate and timely processing of core financial transactions. The Trustee monitors the performance against these SLAs via quarterly reports.

Aviva’s SLA performance over the year to 31 December 2025 was in line with or above the agreed target of 95% (97.8%, 97.9%, 96.4% and 97.8% from Q1 to Q4 2025, respectively).

The pensions team and Aviva have set up various controls to ensure the accuracy of processing core financial transactions, for example:

- a reconciliation to ensure all contributions were processed using monthly Aviva reporting data;
- a quarterly reconciliation of the Plan’s membership transactions to Aviva records; and
- an annual reconciliation of membership using data supplied by Aviva against membership held on the pension administration database.

The Trustee has received assurance from Aviva via management reporting and oral assurance that they have adequate internal controls, including review procedures, and inbuilt automated controls within their systems, to ensure that core financial transactions relating to the Plan were processed promptly and accurately during the year. Any issues identified by the Trustee as part of its review processes (set out below) would be raised with the administrators immediately, and steps would be taken to resolve the issues.

The processes the Trustee has in place for monitoring the core financial transactions are as follows:

- The Trustee reviews quarterly SLA reporting from Aviva, covering reporting on each type of transaction for the number of cases processed, and how many days each has taken;
- The Trustee reviews quarterly management reporting against agreed SLAs from management, detailing what activities have taken place, and what, if any, exceptions have occurred; and
- The Trustee has appointed the Audit and Risk Committee to review the Breaches Register half yearly, where any statutory or legal breaches would be reported.

Based on its review process, the Trustee is satisfied that over the period covered by this statement:

- Both the Plan and the DC provider were operating appropriate procedures, checks and controls, and operating within the agreed SLAs; and
- Core financial transactions have been processed promptly and accurately to an acceptable level during the Plan year.
- There were no material errors in the processing of core financial transactions over the 12 months to 31 December 2025. But there were administration errors as summarised below:
    - Aviva identified an issue during the Plan year regarding the SMPI assumptions used for certain members' Benefit Statements. This issue was identified following a complaint raised by a member. For some active members (particularly those in lifestyle strategies), future contributions were not correctly reflected in the projections, resulting in understated values. This affected approximately 350 new joiners. The root cause was an error in the projection logic, which was subsequently corrected as part of Aviva's August 2025 system release, the impact was limited to projected values only, with no impact on underlying member data or fund values.
    - Following the DC investment transition in September 2025, the Blended Global Equity Fund was not closed to further investment. In total, 45 members were invested in the closed fund at 31 December 2025. Aviva subsequently closed the Blended Global Equity Fund, meaning no future contributions can be allocated to it, and transferred the affected holdings into the correct fund, the Bespoke Global Equity fund following the year end in March 2026. Aviva also made the BNY Mellon Global Equity Fund available to members in error and two members held investment in the fund at year end, these were also transferred to the Bespoke Global Equity fund in 2026.

The Trustee is satisfied that that Aviva corrected the errors identified promptly and ensure no member was financially disadvantaged, and trusts that Aviva has put in place measures to reduce the chance of similar errors occurring in future.

4. Member-borne charges and transaction costs

Regulations also require the Trustee to assess ongoing charges borne by members of the DC Sections and the extent to which those charges and costs represent good value for members.

These are annual fund management charges plus any additional fund expenses, such as custody costs, but excluding transaction costs; this is also known as the total expense ratio ("TER"). The TER is paid by the members and is reflected in the unit price of the funds. The stated charges include administration costs, since these are met by the members.

The Trustee is also required to separately disclose transaction cost figures that are borne by members. In the context of this Statement, the transaction costs shown are those incurred when the Plan's investment managers buy and sell assets within investment funds, but are exclusive of any costs incurred when members invest in and switch between funds. The transaction costs are borne by members.

The charges and transaction costs have been supplied by Aviva (the Plan's provider), and by the Plan's legacy AVC providers. When preparing this section of the Statement the Trustee has taken account the relevant statutory guidance. Due to the way in which transaction costs have been calculated, it is possible for figures to be negative where market movements are favourable between the time a trade is placed and it is executed. Negative figures have been shown in the tables for the year as provided except for the costs and charges illustrations for which zero has been used where a transaction cost is negative to give a more realistic projection (i.e. it is not expected that transaction costs will be negative over the long-term).

4.1 Default arrangements

The default arrangement for the Plan is the **Drawdown lifecycle** arrangement. For the period covered by this Statement, annualised charges and transaction costs are set out in the following table:

Years to selected retirement date (SRD)	TER	Transaction costs
15 or more	0.24%	0.01%
10	0.31%	0.05%
5	0.30%	0.06%
At retirement	0.28%	0.06%

For the period covered by this Statement, annualised charges and transaction costs for the **Cash lifecycle** arrangement are set out in the following table:

Years to SRD	TER	Transaction costs
15 or more	0.24%	0.01%
10	0.31%	0.05%
5	0.30%	0.06%
At retirement	0.14%	0.01%

The **Annuity lifecycle** arrangement is a legacy default lifecycle arrangement and an alternative option for members. For the period covered by this Statement, annualised charges and transaction costs are set out in the following table:

Years to SRD	TER	Transaction costs
15 or more	0.24%	0.01%
10	0.31%	0.05%
5	0.30%	0.06%
At retirement	0.17%	0.01%

Other default arrangements: Over 2025, the BlackRock sterling liquidity fund and the Bespoke global equity fund had a TER of 0.14% and 0.24% respectively, and transaction costs of 0.1% for both funds.

The Trustee is satisfied that the costs and charges are reasonable.

4.2 Self-select options

There is a range of thirteen separate funds which may be chosen by members as an alternative to the default lifecycle arrangements. These funds allow members to take a more tailored approach to managing their own pension investments. The Jupiter ecology fund was closed to new members in 2021; however, members with an existing investment were allowed to remain invested. The Annuity targeting fund is a blended fund used as part of the Drawdown and Annuity lifecycles; however, this fund is not available for members to self-select on a standalone basis.

TERs for each fund for 2025 are shown below, but current charges can also be found on the Plan's website at www.pearson-pensions.com/library. The underlying funds used within the main default arrangement, the Drawdown lifecycle, are shown in bold.

Fund name	TER	Transaction costs
Bespoke global equity fund	**0.24%**	0.01%
Blended multi asset fund	**0.53%**	0.11%
Short duration credit fund	**0.18%**	0.13%
Annuity targeting fund	**0.18%**	0.00%
BlackRock sterling liquidity fund	**0.14%**	0.01%
BlackRock world ex UK equity index fund	0.19%	0.01%
BlackRock UK equity index	0.19%	0.05%
BlackRock over 15 year corporate bond index fund	0.19%	0.16%
BlackRock over 15 Year gilt index fund	0.19%	0.01%
Blended index linked gilt	0.17%	0.02%
Columbia Threadneedle pensions property fund	0.84%	0.15%
Columbia Threadneedle responsible global equity fund	0.68%	0.16%
Jupiter ecology fund	0.92%	0.01%
HSBC Islamic global equity index fund	0.41%	0.01%

4.3 Legacy AVC fund charges and transaction costs

The following funds were available to members as legacy options for AVCs. These options are now closed to future contributions.

Fund name	TER	Transaction costs
Prudential – deposit fund	0.00%	0.00%
Clerical Medical – with-profits fund	0.50% [1]	0.25%
Clerical Medical – balanced fund	0.50% [1]	0.22%
Clerical Medical – cash fund	0.50% [1]	0.02%
Clerical Medical – far eastern fund	0.50% [1]	n/a [1]
Clerical Medical – UK equity tracker fund	0.50% [1]	0.02%
Clerical Medical – ethical fund	0.50% [1]	n/a [1]
Royal London – crest secure fund	1.45%	n/a2 [2]
Phoenix Life – managed pension fund	1.01%[3]	0.01% [4]
Phoenix Life – with-profits fund	0.37%[3]	0.04% [5]

[1]Due to Clerical Medical not providing this data as at the time of issue. Other fund information we sourced separately but that source did not include these two funds .

[2]Royal London has not provided transaction costs as they state it is not possible to do so for this fund.

[3]As at 6/10/2025.

[4] For the year to 1/9/2025.

[5] For the year to 30/6/2025.

4.4 Illustration of charges and transaction costs

The illustrations show how different costs and charges can impact the pension pot over certain periods of time, based on a selection of investment funds. Statutory guidance from The Pensions Regulator has been considered in the preparation of these illustrations. Under each default lifecycle arrangement or investment fund there are two columns; the first shows the projected pension values assuming no charges are taken; the second shows the projected pension values after costs and charges are taken. By comparing these scenarios, it is possible to identify how much the charges over the years will affect the pension value.

The "before costs" figures represent the savings projection assuming an investment return with no deduction of member borne charges or transaction costs. The "after costs" figures represent the savings projection using the same assumed investment return but after deducting member borne charges (i.e. the TER) and an allowance for transaction costs.

The transaction cost figures used in the illustration are those provided by the managers over the past five years, subject to a floor of zero (so the illustration does not assume a negative cost over the long term). The average annualised transaction costs over the past five years have been used as this should be more indicative of longer-term costs compared to only using figures over the Plan year.

The illustration is shown for the Drawdown lifecycle, since this is the arrangement with the most members invested in it, the two alternative default lifecycles (the Cash lifecycle and the Annuity lifecycle), the BlackRock sterling liquidity fund (which is considered a default option) and two funds from the Plan's self-select fund range. The two self-select funds shown in the illustration are:

- the fund with highest annual member borne costs (TER plus Plan Year transaction costs) – this is the Columbia Threadneedle pensions property fund; and
- the fund with lowest annual member borne costs – this is the BlackRock sterling liquidity fund.

Illustration of effect of costs and charges

Projected pension pot in today's money

Years invested	Default option (Drawdown lifecycle)		AVC default option (Cash lifecycle)		Legacy default option (Annuity lifecycle)	
	Before costs £	After costs £	Before costs £	After costs £	Before costs £	After costs £
1	£5,700	£5,700	£5,700	£5,700	£5,700	£5,700
3	£10,700	£10,600	£10,700	£10,600	£10,700	£10,600
5	£16,000	£15,900	£16,000	£15,900	£16,000	£15,900
10	£31,200	£30,700	£31,200	£30,700	£31,200	£30,700
15	£49,200	£48,100	£49,200	£48,100	£49,200	£48,100
20	£70,500	£68,500	£70,500	£68,500	£70,500	£68,500
25	£95,900	£92,400	£95,900	£92,400	£95,900	£92,400
30	£123,100	£117,000	£122,700	£116,700	£123,100	£117,000
35	£151,900	£142,200	£149,700	£140,100	£151,900	£142,200
40	£183,000	£168,800	£165,200	£153,100	£185,600	£172,200

Projected pension pot in today's money

Years invested	Default option (BlackRock sterling liquidity fund)		Default option (Bespoke global equity fund)		Threadneedle pensions property	
	Before costs £	After costs £	Before costs £	After costs £	Before costs £	After costs £
1	£5,500	£5,500	£5,700	£5,700	£5,600	£5,500
3	£9,900	£9,800	£10,700	£10,600	£10,300	£10,100
5	£14,200	£14,100	£16,000	£15,900	£15,100	£14,600
10	£24,800	£24,600	£31,200	£30,700	£27,800	£26,300
15	£35,200	£34,700	£49,200	£48,100	£41,500	£38,200
20	£45,300	£44,600	£70,500	£68,500	£56,200	£50,400
25	£55,100	£54,000	£95,900	£92,400	£72,100	£63,000
30	£64,800	£63,200	£126,000	£120,500	£89,200	£75,900
35	£74,100	£72,100	£161,800	£153,400	£107,700	£89,100
40	£83,300	£80,700	£204,300	£192,100	£127,500	£102,600

Notes:

- Values shown are estimates and are not guaranteed. The illustration does not indicate the likely variance and volatility in the possible outcomes from each strategy/fund. The numbers shown in the illustration are rounded to the nearest £100 for simplicity.
- Projected pension pot values are shown in today's terms, and do not need to be reduced further for the effect of future inflation.
- Annual salary growth and inflation is assumed to be 2.5%. Salaries could be expected to increase above inflation to reflect members becoming more experienced and being promoted. However, the projections assume salaries increase in line with inflation to allow for prudence in the projected values.
- The starting pot size used is £1,800. This is the approximate median pot size for active contributing members aged 25 years and younger in the MP03 and AE sections (as these members can be expected to have around 40 years to retirement)
- The projection is for 40 years, being the approximate duration that the youngest Plan member has until they reach the Plan's Normal Pension Age.
- The starting salary is assumed to be £25,000. This is the approximate median salary for active members aged 25 or younger.
- Total contributions (employee plus employer) are assumed to be 9% of salary per year. This is the median total contributions for active members aged 25 or younger.

The projected annual returns used are as follows:

- Drawdown lifecycle: 3.5% above inflation for the initial years, gradually reducing to a return of 2.2% above inflation at the ending point of the lifecycle.
- Cash lifecycle: 3.5% above inflation for the initial years, gradually reducing to a return of 0.5% below inflation at the ending point of the lifecycle.
- Annuity lifecycle: 3.5% above inflation for the initial years, gradually reducing to a return of 2.5% above inflation at the ending point of the lifecycle.
- BlackRock sterling liquidity fund (which is considered a default, and has the lowest member-borne costs): 0.5% below inflation.
- Blended global equity fund (which is considered a default): 3.5% above inflation.
- Blended multi asset fund: 1.5% above inflation.
- No allowance for active management outperformance has been made.

Whilst these costs are important, they should not be looked at in isolation, but should be viewed within the context of the performance of the fund or funds chosen as these costs are, ultimately, reflected in the performance of the fund.

The expected returns used in the projections are the same assumptions used in the Scheme's latest Statutory Money Purchase Illustrations ("SMPIs"). Rules around SMPIs mean that return assumptions are set in a prescribed way based on the volatility of investment returns, with higher volatility meaning higher assumed returns. Because gilts have been very volatile in recent years the SMPI approach results in assumptions that may be considered unrealistic, specifically that gilts are assumed to have a similar return than equities (6% pa) over the long-term. Therefore, members should interpret the projections with caution and any significant change to their investments should not be based solely on them. Members should consider obtaining professional financial advice before making any significant change to their investments.

5. Investment return

This section states the annual return, after the deduction of member borne charges and transaction costs, for all investment options that members can select or could select during the year, and in which assets relating to members were invested during the Plan year. The Trustee has taken account of the relevant statutory guidance in preparing this section.

For the arrangements where returns vary with age, such as for the default strategies, returns are shown over the year for a member aged 25, 45, 55 and 60 at the start of the period the returns are shown over.

Drawdown lifecycle net returns to 31 December 2025

Age at start of period	1 year (%)	5 year (% pa)
25	13.7	11.1
45	13.7	10.7
55	10.5	4.7
60	9.5	4.1

Cash lifecycle net returns to 31 December 2025

Age at start of period	1 year (%)	5 year (% pa)
25	13.7	11.1
45	13.7	10.7
55	10.6	4.3
60	6.2	3.5

Annuity lifecycle net returns to 31 December 2025

Age at start of period	1 year (%)	5 year (% pa)
25	13.7	11.1
45	13.7	10.7
55	10.5	2.5
60	3.7	-1.8

Note: The underlying investments of the three lifecycles were changed in October 2021; the BlackRock over 15 year corporate bond index fund was replaced with the Short duration credit fund within the three lifecycles and the Blended index linked gilt fund was replaced with the Annuity targeting fund within the Annuity lifecycle. Further changes to the three lifecycle strategies were implemented in June 2024. The 5-year calculations above assume that members were invested in the previous funds, before the first set of changes were made, for the whole of 2021 and were invested in the new lifecycle strategies for all of 2024. In September 2025 the Blended global equity fund was moved into the Pearson Plan Bespoke global equity fund along with the low carbon equity fund. The asset allocation of the Bespoke global equity fund is 31% Aquila Life Global 3000 Fundamental Weighted Index Fund, 31% Aquila Life Global Minimum Volatility Fund, 4% iShares Emerging Markets Index Fund, 34% LGIM Low Carbon Transition Global Equity Fund.

The underlying investments of the Blended multi-asset fund were also amended, removing the allocation to the Baillie Gifford multi-asset fund, and introducing an allocation to the BlackRock Sterling liquidity fund and Bespoke global equity fund. The new asset allocation of the Blended multi-asset fund is 33% BNY Mellon Real Return Fund, 33% Schroders Sustainable Future Multi-Asset Fund, 17% Bespoke global equity fund, and 17% BlackRock Sterling Short Duration Credit Fund.

Self-select fund net returns to 31 December 2025

Fund name	1 year (%)	5 year (% pa)
Bespoke global equity fund	13.7	11.1
BlackRock UK equity index fund	22.0	11.1
BlackRock world ex UK equity index fund	13.9	12.8
Jupiter ecology fund	11.0	6.2
Columbia Threadneedle pensions property fund	5.4	3.8
Blended index linked gilt fund	2.0	-3.0
BlackRock over 15 year corporate bond index fund	5.8	-7.5
BlackRock over 15 year gilt index fund	3.6	-12.2
BlackRock institutional sterling liquidity fund	4.4	3.1
Blended multi asset fund	13.3	3.5
Short duration credit fund	6.7	2.6
Columbia Threadneedle responsible equity fund	3.2	5.9
HSBC Islamic global equity index fund	13.2	14.8

Legacy AVC fund net returns to 31 December 2025

Fund name	1 year (%)	5 year (% pa)
Prudential – deposit fund	4.3	3.1
Clerical Medical – balanced fund	n/a[1]	n/a[1]
Clerical Medical – cash fund	n/a[1]	n/a[1]
Clerical Medical – far eastern fund	n/a[1]	n/a[1]
Clerical Medical – UK equity tracker fund	n/a[1]	n/a[1]
Clerical Medical – ethical fund	n/a[1]	n/a[1]
Royal London – crest secure fund	1.05	1.05
Phoenix Life – managed pension fund	n/a[1]	n/a[1]
Phoenix Life – with-profits fund	n/a[1]	n/a[1]

[1] The respective AVC providers did not provide data in time for inclusion in the Statement.

At the time of writing, net returns for the Clerical Medical and Phoenix Life funds had not been received. The Trustee's advisers requested the data in January 2026 and have not received a response despite regularly chasing.

6. Value for members assessment

The Trustee has assessed the extent to which member borne charges and transaction costs detailed above represent good value for money to members.

The Trustee reviews all member-borne charges (including transaction costs where available) annually, with the aim of ensuring that members are obtaining value for money given the circumstances of the Plan. The date of the last review was 1 May 2026. The Trustee notes that value for money does not necessarily mean the lowest fee, and the overall quality of the service received has also been considered in this assessment. The Trustee's investment advisers have confirmed that the fund charges are competitive for the types of funds available to members.

The Trustee believes that the transaction costs provide value for members as the ability to transact forms an integral part of the investment approaches and expects this to lead to greater investment returns net of costs over time.

The Trustee assesses the performance of the Plan's investment funds (after all charges) in the context of their investment objectives on a quarterly basis. The returns on the investment funds members can choose during the period covered by this Statement have broadly been consistent with their stated investment objectives. However, the Trustee notes that some of the Plan's active funds underperformed their respective targets over the Plan year. The strong performance certain sectors and high volatility of global equities have made it difficult for many equity funds to outperform. The Trustee will continue to monitor the performance of the Plan's funds to determine if any further action is needed for underperforming funds.

Where the Trustee has any concerns that a fund is not providing returns in line with its objective, a review is carried out to assess whether any change is required, noting however, that short-term performance is not used as criteria for the Trustee to change an investment option.

In carrying out the assessment, the Trustee also considers the other benefits members receive from the Plan, which include (amongst other aspects):

- The design of the default arrangements and how these reflect the interests of members.
- The range of investment options and strategies.
- The efficiency of administration processes, the quality of communications, support services and Plan governance, including the benefit of an in-house pensions team, solely focused on the Plan.
- Access to retirement planning tools through the Aviva member site.
- Access to factsheets and guidance provided on the Plan website.
- Additional ill health and death benefits for Plan members.
- Access to live interactive seminars covering relevant pension and financial related topics.

The Trustee has taken advice from its investment advisers, who have analysed the Plan against their benchmark, which is based on pension schemes of a similar size from the client portfolio of our investment adviser.

The results of the Trustee's assessment, on a scale from 'excellent' to 'weak' are as follows:

- **Charges – Excellent** – Members bear the cost of administration charges, but fees are competitive.
- **Administration – Good** – The administration services provided by Aviva are of a good standard. The Trustee will continue working with the administrator to further reduce complaints and to mitigate the risk of errors.
- **Governance – Excellent** – The Trustee and pensions team are very committed to the Plan, demonstrated by the dedicated level of resources and commitment to training.
- **Communications – Excellent** – The Trustee and the administrator issue timely and relevant information to members. Members receive bespoke targeted communications at certain key stages and as they approach retirement. Members also have access to tools and modelling via Aviva's MyWorkplace and the Plan's website.
- **Default investment strategy – Excellent** – The main default investment strategy targets drawdown at retirement, continues to be suitable for the majority of members, and has produced good returns for members and de-risked as expected. Given the imperfect information available about what members will do at retirement, the strategy's ending asset allocation is a compromise between the main ways members are expected to take benefits (that being to move to a drawdown provider or to take the In Plan Pension). The Trustee will review the default investment strategy as part of the triennial strategy reviews.
- **Investment range – Excellent** – The self-select fund range is comprehensive but concise and members are offered access to most asset classes, some specialist options and alternative lifestyle strategies. Continue to monitor the needs of The Plan's membership and trends in the wider DC market to ensure the range remains appropriate.
- **At-retirement support – Good** – Support and guidance offered to members are reasonable. Monitor engagement with the new Information Centre and continue to explore the possibility of appointing a preferred IFA for members.
- **Plan design – Good** – The Plan's design and contribution structure are reasonable and encourage members to take advantage of the extra matching contributions. The Trustee should continue to monitor industry changes and member outcomes (including the PLSA's retirement living standards) to ensure offering remains competitive in the market.

Having considered the various aspects of the Plan, the Trustee is comfortable that the Plan is offering good value to members for costs and charges they incur and will continue to monitor this.

In addition to value provided by the Plan to members, members also benefit from employer contributions, which in the case of the MP03 Section, provides £2 of contributions by the employer for every £1 contributed by the employee, up to the employer contributing a maximum of 16% of the employee's pensionable salary, depending on age. Contributions provided by the employer for the AE Section of the Plan are in line with legislation. Members of the AE Section have the option to switch into the MP03 Section to take advantage of the extra matching contributions.

7. Trustee knowledge and understanding

The Plan's Trustee is required to maintain appropriate levels of knowledge and understanding to run the Plan effectively. The Trustee has measures in place to comply with the legal and regulatory requirements regarding knowledge and understanding of relevant matters, including investment, pension, and trust law. Details of how the knowledge and understanding requirements have been met during the period covered by this Statement are set out below.

As set out on page 10 of the Trustee's Report, a review of the governance of the Plan, including arrangements with respect to Defined Contribution members, their contributions and benefits, is undertaken by the Trustee through its board and committees.

The Trustee's priority is to provide a strong and stable pension scheme which operates in the interests of its members and to achieve this the Trustee Board and its Committees meet regularly to develop and agree strategy, monitor performance, discuss, and explore issues relevant to the governance and administration of the DC arrangements and make appropriate decisions.

The Plan's Trustee Directors are required to maintain appropriate levels of knowledge and understanding to run the Plan effectively. Each Trustee Director must:

- Be conversant with the trust deed and rules of the Plan, the Plan's statement of investment principles and any other document recording policy for the time being adopted by the Trustee relating to the administration of the Plan generally,
- have, to the degree that is appropriate for the purposes of enabling the individual to exercise properly his or her functions as a trustee director, knowledge and understanding of the law relating to pensions and trusts and the principles relating to the investment of the assets of occupational pension schemes.

The Trustee has measures in place to comply with the legal and regulatory requirements regarding knowledge and understanding of relevant matters, including investment, pension, and trust law. The CEO of Pearson Pension Trustee Services Limited aims to identify training needs on any topics that become relevant, as well as the Trustee Directors themselves raising any training needs informally in meetings and other communications, and more formally via the annual Trustee evaluation questionnaire. Any Trustee Knowledge & Understanding ("TKU") requirements are shared with the Chair each year and incorporated into the Trustee Action Plan. In addition, the Trustee Directors also receive various legal updates from the Plan's lawyers. Some of the Trustee Directors have also undertaken individual training across a range of topics which has been recorded within TKU records held by the CEO of Pearson Pension Trustee Services Limited.

Documents and guidance with Plan specific information, including Plan Rules, are provided via the digital board book system to all Trustee Directors and committee members. All changes to Plan rules are approved by the Trustee. The SIP is available on the website (https://www.pearson-pensions.com/library) and is also regularly discussed in Trustee and committee meetings and reviewed at least annually.

All new trustee directors are asked to complete the Pension Regulator's trustee toolkit (an online learning programme, designed to help trustees of occupational pension schemes meet the minimum level of knowledge and understanding required by law), and receive detailed briefings from both the CEO of Pearson Pension Trustee Services Limited and key advisers, as well as other Plan staff as required, which are tailored to the individuals' existing knowledge and expertise.

The Trustee believes that the combined knowledge and understanding of the Trustee Directors, the independent members of certain committees and the staff of the Plan, together with external advice where appropriate, enables the Trustee to exercise properly its functions by collectively providing experience of governance, pension fund management, administration, investment, finance, audit, and member representation.

The Chair's Defined Contribution Governance Statement was approved by the Trustee on and signed on its behalf by:

L Ruddick

Chair of the Trustee

INDEPENDENT AUDITOR'S REPORT TO THE TRUSTEE OF THE PEARSON PENSION PLAN

Opinion

We have audited the financial statements of The Pearson Pension Plan ('the Plan') for the year ended 31 December 2025 which comprise the fund account, the statement of net assets (available for benefits) and the related notes set out therein.

The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards (United Kingdom Generally Accepted Accounting Practice), including FRS102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland".

In our opinion, the financial statements:

- show a true and fair view of the financial transactions of the Plan during the year ended 31 December 2025, and of the amount and disposition at that date of its assets and liabilities, other than liabilities to pay pensions and benefits after the end of the year;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- contain the information specified in Regulations 3 and 3A of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, made under the Pensions Act 1995.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the 'Auditor's responsibilities for the audit of the financial statements' section of our report. We are independent of the Plan in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions Relating to Going Concern

In auditing the financial statements, we have concluded that the trustee's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Plan's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

However, as we cannot predict all future events or conditions, and as subsequent events may result in outcomes that are inconsistent with judgements that were reasonable at the time they were made, the above conclusions are not a guarantee that the Plan will continue in operation.

Our responsibilities and the responsibilities of the Trustee with respect to going concern are described in the relevant sections of this report.

Other Information

The Trustee is responsible for the other information contained within the annual report. The other information comprises the information included in the annual report, other than the financial statements and our auditor's report thereon. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

Our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Responsibilities of the Trustee for the Financial Statements

As explained more fully in the Statement of Trustee's Responsibilities set out pages 30, the Trustee is responsible for the preparation of financial statements, for being satisfied that they give a true and fair view, and for such internal control as the Trustee determines necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Trustee is responsible for assessing the Plan's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Trustee either intends to wind up the Plan or has no realistic alternative but to do so.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion.

Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud.

We set out below the key areas which, in our opinion the financial statements are susceptible to material misstatement by way of irregularities including fraud and the extent to which our procedures are capable of detecting these.

- Management override of controls. Our audit procedures to respond to these risks included enquiries of management about their own identification and assessment of the risks of irregularities, sample testing on the posting of journals and reviewing accounting estimates for bias.
- Misappropriation of investment assets owned by the Plan. This is addressed by obtaining direct confirmation from the investment managers of investments held at the Statement of Net Assets date.
- Diversion of assets through large investment transactions. Reviewing the AAF 01/20 / ISAE 3402 Assurance Reports on Internal Controls or similar for investment managers and custodians and testing investment transactions to investment manager /custodian reports.
- Verification of the right to annuity income from bulk annuity policies. This is addressed by way of a reconciliation being performed of annuity income receivable from the bulk annuity provider and benefits paid to members during the year.
- We have identified relevant laws and regulations that have a direct effect on the determination of material amounts and disclosures in the financial statements, as the Pensions Acts 1995 and 2004 (and regulations made thereunder), FRS 102, and the Pensions Statement of Recommended Practice (SORP). We considered the extent to which a material misstatement of the financial statements might arise as a result of non-compliance.
- Reviewing meeting minutes and any correspondence with the Pensions Regulator.
- Discussing whether there are any significant or unusual transactions and known or suspected instances of fraud or non-compliance with applicable laws and regulations.

Owing to the inherent limitations of an audit, there is an unavoidable risk that we may not have detected some material misstatements in the financial statements, even though we have properly planned and performed our audit in accordance with auditing standards. We are not responsible for preventing non-compliance and cannot be expected to detect non-compliance with all laws and regulations.

These inherent limitations are particularly significant in the case of misstatement resulting from fraud as this may involve sophisticated schemes designed to avoid detection, including deliberate failure to record transactions, collusion or the provision of intentional misrepresentations.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Use of our Report

This report is made solely to the Plan's Trustee, as a body, in accordance with the Pensions Act 1995 and Regulations made thereunder. Our audit work has been undertaken so that we might state to the Plan's Trustee those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Plan's Trustee as a body, for our audit work, for this report, or for the opinions we have formed.

Crowe U.K. LLP

Statutory Auditor

London

Date:

THE PEARSON PENSION PLAN

INDEPENDENT AUDITOR'S STATEMENT ABOUT CONTRIBUTIONS UNDER REGULATION 4 OF THE OCCUPATIONAL PENSION SCHEMES (REQUIREMENT TO OBTAIN AUDITED ACCOUNTS AND A STATEMENT FROM THE AUDITOR) REGULATIONS 1996 TO THE TRUSTEE OF THE PEARSON PENSION PLAN

We have examined the summary of contributions payable to The Pearson Pension Plan, for the Plan year ended 31 December 2025 which is set out on page 89. In our opinion, contributions for the Plan year ended 31 December 2025 as reported in the summary of contributions and payable under the Schedules of Contributions have in all material respects been paid at least in accordance with the Schedules of Contributions certified by the Plan Actuary on the 18 July 2024 and 18 March 2025.

Basis of opinion

Our objective is to obtain sufficient evidence to give reasonable assurance that contributions reported in the summary of contributions have in all material respects been paid at least in accordance with the Schedule of Contributions. This includes an examination, on a test basis, of evidence relevant to the amounts of contributions payable to the Plan and the timing of those payments under the Schedule of Contributions.

Responsibilities of the Trustee

As explained more fully in the Statement of Trustee's Responsibilities, the Plan's Trustee is responsible for ensuring that there is prepared, maintained and from time to time revised a Schedule of Contributions which sets out the rates and due dates of certain contributions payable towards the Plan by or on behalf of the employer and the active members of the Plan. The Trustee is also responsible for keeping records in respect of contributions received in respect of active members of the Plan and for monitoring whether contributions are made to the Plan by the employer in accordance with the Schedule of Contributions.

Auditor's responsibilities for the statement about contributions

It is our responsibility to provide a Statement about Contributions paid under the Schedule of Contributions and to report our opinion to you.

Use of our statement

This statement is made solely to the Plan's Trustee, as a body, in accordance with The Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996 made under the Pensions Act 1995. Our work has been undertaken so that we might state to the Plan's Trustee those matters we are required to state to them in an auditor's statement about contributions and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Plan's Trustee as a body, for our work, for this statement, or for the opinion we have formed.

Crowe U.K. LLP, Statutory Auditor
London
Date:

THE PEARSON PENSION PLAN

FUND ACCOUNT

FOR THE YEAR ENDED 31 DECEMBER 2025

	Notes	Defined Benefit Sections £'000	Defined Contribution Sections £'000	**2025 Total £'000**	Defined Benefit Sections £'000	Defined Contribution Sections £'000	**2024 Total £'000**
Contributions and benefits							
Employer contributions		844	22,768	**23,612**	738	16,166	**16,904**
Member contributions		107	2,278	**2,385**	107	667	**774**
Total contributions		951	25,046	**25,997**	845	16,833	**17,678**
Transfers in	4	-	239	**239**	-	223	**223**
Other income	5	138	1,776	**1,914**	146	319	**465**
		1,089	27,061	**28,150**	991	17,375	**18,366**
Benefits	6	(120,414)	(5,615)	**(126,029)**	(114,059)	(4,219)	**(118,278)**
Payments to and on account of leavers	7	(1,194)	(20,469)	**(21,663)**	(1,013)	(16,964)	**(17,977)**
Administrative expenses	8	(9,118)	-	**(9,118)**	(8,483)	-	**(8,483)**
Other payments	9	(561)	-	**(561)**	(448)	-	**(448)**
		(131,287)	(26,084)	**(157,371)**	(124,003)	(21,183)	**(145,186)**
Net movements from dealings with members		(130,198)	977	**(129,221)**	(123,012)	(3,808)	**(126,820)**
Returns on investments							
Investment income	10	152,744	-	**152,744**	114,887	-	**114,887**
Change in market value		(49,065)	94,009	**44,944**	(265,136)	81,805	**(183,331)**
Investment management expenses	12	(1,260)	-	**(1,260)**	(1,237)	-	**(1,237)**
Net return on investments		102,419	94,009	**196,428**	(151,486)	81,805	**(69,681)**
Net increase/ (decrease) in the Fund during the year		(27,779)	94,986	**67,207**	(274,498)	77,997	**(196,501)**
Transfers between sections	15	7,800	(7,800)	-	(1,276)	1,276	-
Net assets of the Plan							
At 1 January		2,215,606	771,513	**2,987,119**	2,491,380	692,240	**3,183,620**
At 31 December		2,195,627	858,699	**3,054,326**	2,215,606	771,513	**2,987,119**

THE PEARSON PENSION PLAN

STATEMENT OF NET ASSETS

AS AT 31 DECEMBER 2025

	Notes	2025 Defined Benefit Sections £'000	2025 Defined Contribution Sections £'000	**2025 Total £'000**	2024 Defined Benefit Sections £'000	2024 Defined Contribution Sections £'000	**2024 Total £'000**
Investment assets	11						
Bonds		134,632	-	**134,632**	116,313	-	**116,313**
Property		150,500	-	**150,500**	140,050	-	**140,050**
Pooled investment vehicles		936,119	831,899	**1,768,018**	960,732	748,254	**1,708,986**
Insurance policies		901,700	-	**901,700**	940,700	-	**940,700**
Other investment balances		2,523	-	**2,523**	1,888	-	**1,888**
Cash		65,439	-	**65,439**	42,756	-	**42,756**
AVC investments		-	22,764	**22,764**	-	19,565	**19,565**
		2,190,913	854,663	**3,045,576**	2,202,439	767,819	**2,970,258**
Investment liabilities	11						
Other investment balances		(2,047)	-	**(2,047)**	(1,950)	-	**(1,950)**
Total net investments		2,188,866	854,663	**3,043,529**	2,200,489	767,819	**2,968,308**
Current assets	14a	19,384	5,606	**24,990**	24,976	9,522	**34,498**
Current liabilities	14b	(12,623)	(1,570)	**(14,193)**	(9,859)	(5,828)	**(15,687)**
		6,761	4,036	**10,797**	15,117	3,694	**18,811**
Net assets of the Plan at 31 December		2,195,627	858,699	**3,054,326**	2,215,606	771,513	**2,987,119**

The financial statements summarise the transactions of the Plan including the Pearson Pension Property Fund and deal with the net assets at the disposal of the Trustee. They do not take account of obligations to pay pensions and other benefits which fall due after the end of the Plan year. The actuarial position of the Plan, which does take account of such obligations, is dealt with in the Report on Actuarial Liabilities on page 91 and Actuary's certification of the Schedule of Contributions on page 90 and these financial statements should be read in conjunction therewith. An actuarial valuation was carried out by the Plan Actuary as at 1 January 2024.

These financial statements were approved by Pearson Pension Trustee Limited as Trustee of the Plan on
and signed on its behalf by:

Chair

Director

1. BASIS OF PREPARATION

The financial statements have been prepared on a going concern basis in accordance with the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996 and in accordance with the guidelines set out in the Statement of Recommended Practice, "Financial Reports of Pension Schemes" (Revised November 2018).

2. ACCOUNTING POLICIES

The principal accounting policies adopted by the Trustee, which are consistent with the previous year, are shown below for the Defined Benefit (DB) and Defined Contribution (DC) Sections:

a. <u>Investments</u>

i. Investments other than property

- Private equity funds and infrastructure funds are valued at fair value by the investment managers or their third-party agents, having regard to professional valuations, asset values and other appropriate financial information. If the latest available valuation is not calculated at the Plan's year end date the latest valuation prior to the Plan's year end is adjusted for any drawdowns, refunds, or capital distributions since the valuation date. Drawdowns and distributions are accounted for at the date they are declared or notified to the Plan.

- Segregated Bonds are valued based on the evaluated prices provided by pricing vendors used by our custodian Bank of New York Mellon who use "International Currency Exchange – Foreign". Prices are based on clean prices (the value of the bond less the accrued interest) and may be determined by factors which include but are not limited to, market quotations, yields, maturities, call features, ratings, and institutional size trading in similar groups of securities.

- Other pooled investment vehicles with the exception of the Trade Finance holding are valued at the bid market values for funds with bid/ offer spreads, or a single price where there are no bid / offer spreads, as provided by the relevant investment managers on the last dealing day prior to the year end date. Within other pooled investment vehicles swap contracts and repurchase agreements are held under a QIAIF arrangement, the swap contracts are valued by the investment manager using discounted cash flow models and market data at the reporting date. The repurchase agreements recognise and value the securities that are delivered out as collateral. The cash received is recognised as an asset and the obligation to pay it back is recognised as a payable amount. Trade Finance is valued using discounted cashflow models together with market factors relating to the borrower such as credit risk and past behaviour.

- Investments held in foreign currencies are valued as above and translated into Sterling at the relevant spot rates ruling at the year end date.

2. ACCOUNTING POLICIES (continued)

ii. Pearson Pension Property Fund

- The investments held in the Pearson Pension Property Fund are fully consolidated into the Plan's financial statements as the Plan is the only beneficiary.

- Freehold and leasehold properties are valued in accordance with the relevant parts of the current Royal Institution of Chartered Surveyors (RICS) Valuation Standards. Under these provisions the term "market value" means "the estimated amount for which a property should exchange on the date of valuation between a willing buyer and a willing seller in an arm's-length transaction after proper marketing wherein the parties had each acted knowledgeably, prudently and without compulsion." The RICS considers that the application of the market value definition provides the same result as current open market values.

- The commercial property portfolio and Housing Association Investments are valued by Knight Frank LLP.

- Pooled property funds are valued in accordance with the accounting treatment for pooled investment vehicles disclosed in note 2(a)(i).

- No depreciation is provided on freehold or leasehold properties.

iii. Insurance policies

- AVCs invested in insurance policies are valued on the basis of their open market transfer values quoted by the relevant insurance companies as adjusted for additions and withdrawals between the valuation dates and 31 December.

- Bulk annuity policies are valued by the Plan Actuary at the amount of the related obligation, determined broadly in line with the most recent technical provisions assumptions at the reporting date.

b. <u>Contributions receivable</u>

Contributions receivable are included on an accruals basis.

2. ACCOUNTING POLICIES (continued)

c. Investment income

i. Investment income, such as distributions from pooled investment vehicles are accounted for when declared by the investment manager.

ii. Dividends on unlisted securities are accounted for when declared, with dividends on certain foreign investments being accounted for when received.

iii. Net income from properties is accounted for on an accruals basis.

iv. Deposit and other interest receivable is accounted for on an accruals basis.

v. Annuity income arising from contracts held with insurers is accounted for on an accruals basis.

d. Transfers in

Transfers in from other registered pension arrangements include all transfers which have been formerly accepted by the Trustee of the Plan as at 31 December in respect of individual members.

e. Benefits payable

i. Transfers out are accounted for on a cash basis and represent the capital sums paid to personal pensions or pension plans of new employers for members who have left service.

ii. Benefits payable in respect of retirements and deaths are accounted for on an accruals basis.

f. Expenses

All expenses are accounted for on an accruals basis.

i. Fees to investment managers and fees paid directly to the Custodian are shown as investment management expenses.

ii. All expenses relating to direct property investments held via the Pearson Pension Property Fund are deducted from investment income.

3 CONTRIBUTIONS RECEIVABLE

2025

		DB Sections £'000	DC Sections £'000	**Total £'000**
Employer contributions				
Normal	(a) (i)	844	21,556	**22,400**
Additional voluntary	(a) (ii)	-	1,212	**1,212**
Member contributions				
Normal	(b) (i)	107	622	**729**
Additional voluntary	(b) (ii)	-	1,656	**1,656**
		951	25,046	**25,997**

2024

		DB Sections £'000	DC Sections £'000	Total £'000
Employer contributions				
Normal	(a)(i)	738	13,796	14,534
Additional voluntary	(a)(ii)	-	2,370	2,370
Member contribution				
Normal	(b)(i)	107	550	657
Additional voluntary	(b)(ii)	-	117	117
		845	16,833	17,678

a. Employer contributions

i. Amounts were receivable from participating employers in accordance with the Schedule of Contributions dated 20 December 2023, from 1 January 2024 to 30 June 2024, the Schedule of Contributions dated 18 July 2024, from 1 July 2024 to 31 March 2025 and the Schedule of Contributions dated 18 March 2025, from 1 April 2025 to 31 December 2025.

From 1 January 2024 to 30 June 2024, the full amount of the employer contributions due to the Plan in respect of members of the DB and DC Sections were offset against the surplus assets in the DB Sections as agreed between the Employer and the Trustee. From 1 July 2024, employer contributions recommenced in accordance with the new Schedule of Contributions.

Salary exchange came into effect from 1 November 2022. Employer normal contributions includes £6.50m (2024: £6.72m) in respect of salary exchange.

3 CONTRIBUTIONS RECEIVABLE (continued)

ii. AVCs paid by employers are used to purchase investments, the value of which determines the benefit to members, and which have been invested separately from the main fund (see note 11(a)).

Employer AVCs includes £1.2m (2024: 2.36m) in respect of salary exchange.

b. Member contributions

i. Members' normal contributions (excluding AVCs) are paid at various rates as set out in the Plan rules.

ii. AVCs are paid by members to purchase investments, the value of which determines the benefit to members, and which have been invested separately from the main fund (see note 11(a)).

4 TRANSFERS IN

		2025	
	DB Sections £'000	DC Sections £'000	**Total £'000**
Individual transfers in from other schemes	-	239	**239**
	-	239	**239**

		2024	
	DB Sections £'000	DC Sections £'000	Total £'000
Individual transfers in from other schemes	-	223	223
	-	223	223

5 OTHER INCOME

	2025		
	DB Sections £'000	DC Sections £'000	**Total £'000**
Claims on term insurance policies	-	1,764	**1,764**
Bank interest	136	-	**136**
Other income	2	12	**14**
	138	1,776	**1,914**

	2024		
	DB Sections £'000	DC Sections £'000	Total £'000
Claims on term insurance policies	-	310	310
Bank interest	141	-	141
Other income	5	9	14
	146	319	465

6 BENEFITS PAYABLE

		2025	
	DB Sections £'000	DC Sections £'000	**Total £'000**
Pensions	109,125	-	**109,125**
Commutation of pensions and lump sum retirement benefits	10,829	2,740	**13,569**
Lump sum death benefits	454	2,744	**3,198**
Taxation where lifetime or annual allowance exceeded	6	131	**137**
	120,414	5,615	**126,029**

		2024	
	DB Sections £'000	DC Sections £'000	Total £'000
Pensions	100,541	-	100,541
Commutation of pensions and lump sum retirement benefits	12,851	3,508	16,359
Lump sum death benefits	546	569	1,115
Taxation where lifetime or annual allowance exceeded	121	142	263
	114,059	4,219	118,278

In accordance with the Plan Rules, insurance cover, arranged by the Trustee, is maintained to cover the liability for payment of cash lump sums in respect of members who die during service.

7 PAYMENTS TO AND ON ACCOUNT OF LEAVERS

	2025		
	DB Sections £'000	DC Sections £'000	**Total £'000**
Individual transfers out to other schemes	1,194	20,469	**21,663**
	1,194	20,469	**21,663**

	2024		
	DB Sections £'000	DC Sections £'000	Total £'000
Individual transfers out to other schemes	1,013	16,964	17,977
	1,013	16,964	17,977

8 ADMINISTRATIVE EXPENSES

	2025		
	DB Sections £'000	DC Sections £'000	**Total £'000**
Administration and processing	8,044	-	**8,044**
Professional fees	1,074	-	**1,074**
	9,118	-	**9,118**

	2024		
	DB Sections £'000	DC Sections £'000	Total £'000
Administration and processing	6,621	-	6,621
Professional fees	1,862	-	1,862
	8,483	-	8,483

9 OTHER PAYMENTS

	2025		
	DB Sections £'000	DC Sections £'000	**Total £'000**
Premiums on term insurance policies	561	-	**561**
	561	-	**561**

	2024		
	DB Sections £'000	DC Sections £'000	Total £'000
Premiums on term insurance policies	448	-	448
	448	-	448

10 INVESTMENT INCOME

	2025		
	DB Sections £'000	DC Sections £'000	**Total £'000**
Income from fixed interest securities	5,654	-	**5,654**
Income from pooled investment vehicles*	56,311	-	**56,311**
Net income from properties	9,832	-	**9,832**
Interest on cash deposits	1,082	-	**1,082**
Annuity income	79,761	-	**79,761**
Other investment income	104	-	**104**
	152,744	-	**152,744**

*Income from pooled investment vehicles a higher than normal due to receiving a large distribution from the Meridiam Infrastructure fund.

	2024		
	DB Sections £'000	DC Sections £'000	Total £'000
Income from fixed interest securities	5,252	-	5,252
Income from pooled investment vehicles	18,257	-	18,257
Net income from properties	9,944	-	9,944
Interest on cash deposits	1,094	-	1,094
Annuity income	80,249	-	80,249
Other investment income	91	-	91
	114,887	-	114,887

11a Reconciliation of Investments

	Notes	Value at 31 12 2024 £'000	Purchases at cost £'000	Sales proceeds £'000	Change in market value £'000	**Value at 31.12.2025 £'000**
DB Sections						
Bonds		116,313	49,551	(33,602)	2,370	**134,632**
Property	(11c)	140,050	45	-	10,405	**150,500**
Pooled investment vehicles	(11d,e)	960,732	3,676	(5,449)	(22,840)	**936,119**
Insurance policies	(11f)	940,700	-	-	(39,000)	**901,700**
		2,157,795	53,272	(39,051)	(49,065)	**2,122,951**
Cash		42,756				**65,439**
Other investment assets		1,888				**2,523**
Other investment liabilities		(1,950)				**(2,047)**
		2,200,489				**2,188,866**
DC Sections						
Pooled investment vehicles	(11d)	748,254	632,294	(640,239)	91,590	**831,899**
AVC investments		19,565	15,824	(15,044)	2,419	**22,764**
		767,819	648,118	(655,283)	94,009	**854,663**
Total Investments		2,968,308			44,944	**3,043,529**

AVC investments within the DC Sections include £7.43m (2024: £7.43m) held by DB members. The AVC investments are defined contributions in nature and are therefore included in that Section. All DC Section investments are allocated to members.

The change in market value of investments during the year comprise all increases and decreases in the market value of investments held at any time during the year, including profits and losses realised on the sale of investments during the year.

Transaction costs are included in the cost of purchases and sales proceeds and are disclosed in note 11(g). The Trustee believes that the majority of the Plan's investments are readily marketable and that the methods used for their valuation are appropriate to each class of investment.

The Purchases in Bonds represent the reinvestment of bond maturities (shown as sales) held with Aegon Asset Management Ltd, as well as any excess cash held by the Plan during the year.

The purchases in DB Pooled Investment Vehicles mainly represent the reinvestment of income from the working capital fund held with Allianz Global Investors. The sales mainly relate to capital distributions from infrastructure funds, Aberdeen Infrastructure Partners LP Inc., Infrared Capital Partners Ltd, and the private equity fund held with Pantheon Ventures Ltd.

The purchases and sales under the DC Pooled investment vehicles include changes made to funds on the 30 September 2025, consisting of changes to the underlying assets within the Blended Multi Asset Fund and the transition of the Blended Global Equity Fund to the Bespoke Global Equity Fund. All DC Section investments are allocated to members.

Other investment assets mainly consists of accrued income on bonds held with Aegon Asset Management Ltd and other investment liabilities mainly include accrued expenses within the property fund held with LaSalle Investment Management Limited.

11(b) FAIR VALUE HIERARCHY

The investments have been analysed according to the basis on which the fair value has been categorised. A fair value measurement is categorised in its entirety on the basis of the lowest level input that is significant to the fair value measurement in its entirety.

Level 1: The unadjusted quoted prices in an active market for identical assets or liabilities that the entity can access at the measurement date.

Level 2: Inputs other than quoted prices included within level 1 that are observable (i.e., developed using market data) for the asset or liability, either directly or indirectly.

Level 3: Inputs are unobservable (i.e., for which market data is unavailable for the asset or liability).

	2025			
	Level 1	Level 2	Level 3	**Total**
	£'000	£'000	£'000	**£'000**
DB Sections				
Bonds	-	134,632	-	**134,632**
Properties	-	-	150,500	**150,500**
Pooled investment vehicles	-	557,232*	378,887	**936,119**
Insurance policies	-	-	901,700	**901,700**
Cash	65,439	-	-	**65,439**
Other investment assets and liabilities	476	-	-	**476**
	65,915	691,864	1,431,087	**2,188,866**
DC Sections				
Pooled investment vehicles	-	831,899	-	**831,899**
AVC investments	-	22,365	399	**22,764**
	-	854,264	399	**854,663**
	65,915	1,546,128	1,431,486	**3,043,529**

11(b) FAIR VALUE HIERARCHY (continued)

		2024		
	Level 1	Level 2	Level 3	Total
	£'000	£'000	£'000	£'000
DB Sections	-	116,313	-	116,313
Bonds	-	-	140,050	140,050
Properties	-	545,948*	414,784	960,732
Pooled investment vehicles	-	-	940,700	940,700
Insurance policies	42,756	-	-	42,756
Cash	(62)	-	-	(62)
Other investment assets and liabilities	42,694	662,261	1,495,534	2,200,489
DC Sections	-	748,254	-	748,254
Pooled investment vehicles	-	19,116	449	19,565
AVC investments	-	767,370	449	767,819
	42,694	1,429,631	1,495,983	2,968,308

*The QIAIF investment, which is classed as a pooled investment vehicle, is neither listed nor tradable on a regulated market. The fund is weekly priced; however, the underlying holdings are priced on a daily basis and there are no redemption restrictions.

The QIAIF assets can also be transferred to another investment manager should the need arise. For these reasons, the QIAIF is categorised as a level 2 investment. The underlying gilts are readily tradable and there is a liquid market for these instruments whilst the underlying swaps and repurchase agreements can be terminated prior to their expiry, subject to associated costs.

11(c) PROPERTY

	2025	2024
	£'000	£'000
DB Sections		
Property	**150,500**	140,050

The Plan holds a number of interests in UK commercial properties. There are no restrictions on the realisability of the properties, the remittance of income, or disposal proceeds. The properties are, however, illiquid, as they would take between 6 and 12 months to find a suitable buyer to purchase them at fair value. For all properties that are occupied, it is the tenants who are responsible for repairs and maintenance and dilapidations at the end of their lease.

11(c) PROPERTY (continued)

The properties are valued annually at fair value by Knight Frank LLP, a member firm of the Royal Institution of Chartered Surveyors, in accordance with the Royal Institution of Chartered Surveyors Valuation Standards UK PS 1.1 Valuation for Financial Statements. The principal assumptions on which the valuation was based were rental income, the remaining terms of the leases, and the market rents for those properties.

11(d) POOLED INVESTMENT VEHICLES

	2025	2024
	£'000	£'000
DB Sections		
Return seeking		
Private equity fund	**6,554**	9,112
Property funds	**7,221**	7,607
Trade finance fund*	**61,881**	58,138
Infrastructure funds	**82,416**	112,757
	158,072	187,614
DB Sections		
Liability matching		
Bond fund	**-**	161
Infrastructure funds	**220,815**	227,009
QIAIF**	**557,232**	545,948
	778,047	773,118
	936,119	960,732
DC Sections		
Equity funds	**587,214**	538,824
Bond funds	**110,014**	93,654
Property funds	**2,250**	2,356
Diversified growth funds***	**119,501**	101,875
Cash funds	**12,920**	11,545
	831,899	748,254

11(d) POOLED INVESTMENT VEHICLES (continued)

*Trade Finance - Allianz Working Capital Fund invests in illiquid obligations financing the working capital and commercial trade contracts for both small and medium enterprises to large corporates.
**Qualifying investor alternative investment fund managed by Legal & General - see note 11(e).
***The Blended Multi-Asset Fund - An actively managed fund invested in a range of asset types. The fund's benchmark is a blend of the underlying fund targets.

11(e) QUALIFYING INVESTOR ALTERNATIVE INVESTMENT FUND

The qualifying investor alternative investment fund (QIAIF) is a pooled arrangement where the Plan is the only participant in the fund. The objective of the QIAIF is to hedge the impact of future changes in interest and inflation rates on the actuarial liabilities using gilts, index-linked gilts, total return swaps, and repurchase agreements, where necessary. The following table provides a breakdown of the securities within the pooled QIAIF investment vehicle as at the year ended 31 December 2025.

	2025	2024
	£'000	£'000
DB Sections		
Government bonds	**542,271**	595,550
Payable under repurchase agreements*	**(37,503)**	(60,740)
Swap assets**	**7,233**	6,332
Swap liabilities**	**(7,254)**	(5,852)
Cash and other investment balances	**52,485**	10,658
	557,232	545,948

* Under repurchase agreements, £37.6m of securities (2024: £57.7m) that are delivered continue to be recognised within government bonds. The obligation to pay back the cash received in respect of the securities is recognised as a liability. The value of collateral pledged by the Plan on these agreements as at 31 December 2025 was £115k (2024: £3.7m) and the value received by the Plan was £4k (2024: £nil). The collateral is in the form of gilts.

11(e) QUALIFYING INVESTOR ALTERNATIVE INVESTMENT FUND (continued)

Income received during the year from investments held within the QIAIF amounted to £14.4m (2024: £15.0m) this was reinvested into the fund.

	Nominal amount £'000	Market value of assets £'000	Market value of liabilities £'000
DB Sections			
****Swap Contracts**			
2025			
Interest rate	68,242	7,021	(6,733)
Inflation rate	55,022	212	(521)
Total	**123,264**	**7,233**	**(7,254)**
2024			
Interest rate	97,790	4,151	(4,319)
Inflation rate	82,684	2,181	(1,533)
Total	180,474	6,332	(5,852)

The expiration dates of the swap contracts are between 2026 and 2068 (2024: 2025 to 2073). The collateral pledged by the Plan on the initial margin on these contracts is in the form of a government bond valued at £2.1m (2024: £1.1m government bond pledged by the Plan). The net collateral posted on the variation margin at the year-end is £nil. In the prior year, as at 31 December 2024, £0.5m of cash was posted to the Plan by the counterparty in order to collateralise the net gain on swaps as shown in note 11e above. The swap contracts are held in line with the strategy.

11(f) INSURANCE POLICIES

The Plan held insurance policies at year end as follows:

	2025 **£'000**	2024 £'000
DB Sections		
Annuity policies	901,700	940,700

The annuity policies relate to two buy-in contracts with Aviva Life and Legal and General Assurance taken by the Plan, as well as legacy arrangements. The buy-in contracts provide annuity income which is used to pay the benefits for approximately two-thirds of the pensioner population. The policies have been valued by the Plan Actuary using prudent demographic assumptions and a discount rate based on gilt yields with no margin. The discount rate used is BoE gilt curve, with a single equivalent rate of 4.85% (2024: 4.9%), price inflation assumptions is BoE gilt RPI curve, with a single equivalent rate of 3.1% (2024: 3.5%) and pension increases are devised using Black Scholes model with volatility parameters of 1.5% for RPI and 1.0% for CPI.

11(f) INSURANCE POLICIES (continued)

Collateral is held in respect of these arrangements in the Plan's name, with the Plan's custodian. At 31 December 2025, £1,226m (2024: £1,278m) of collateral was held in the form of Corporate and Government Bonds as well as a small amount of cash. All assets held in the collateral are denominated in Sterling, Euro, and US Dollars.

11(g) TRANSACTION COSTS

Transaction costs are included in the cost of purchases and deducted from sales proceeds. Direct transaction costs charged to the Plan comprise fees, commission, and stamp duty.

Transaction costs analysed by main asset class and type of cost are as follows:

	2025	2024
	£'000	£'000
DB Sections		
Property - Fees	**-**	38

In addition to the transaction costs disclosed above, indirect costs are incurred through the bid/offer spread on investments within pooled investment vehicles and charges are made within those vehicles.

11(h) INVESTMENT RISKS

FRS 102 requires the disclosure of information in relation to certain investment risks.

Credit risk: This is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation.

Market risk: This comprises currency risk, interest rate risk and other price risk.

- **Currency risk:** This is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in foreign exchange rates.
- **Interest rate risk:** This is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in market interest rates.
- **Other price risk:** This is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in market prices (other than those arising from interest rate or currency risk), whether those changes are caused by factors specific to the individual financial instrument or its issuer, or factors affecting all similar financial instruments traded in the market.

11(h) INVESTMENT RISKS (continued)

The following table summarises the extent to which the various classes of investments are affected by financial risks:

	Credit	**Market**						
		Currency	**Interest Rate**	**Other Price**	**2025 £'000**	**%**	2024 £'000	%
DB Sections								
Return seeking assets								
Pooled investment	●	◐	◐	◐	158,072	7.2	187,614	8.4
Private equity	●	◐	◐	◐	*6,554*	*0.3*	*9,112*	*0.4*
Property	●	◐	◐	◐	*7,221*	*0.3*	*7,607*	*0.3*
Trade finance	●	◐	◐	◐	*61,881*	*2.8*	*58,138*	*2.6*
Infrastructure	●	◐	◐	◐	*82,416*	*3.8*	*112,757*	*5.1*
Other investment assets	●	○	●	○	48	0.0	49	0.0
					158,120	**7.2**	**187,663**	**8.4**
Liability matching assets and liabilities								
Pooled investment	●	◐	◐	◐	778,047	35.6	773,118	35.2
LDI (QIAIF)	●	○	◐	◐	*557,232*	*25.5*	*545,948*	*24.9*
Infrastructure	●	◐	◐	◐	*220,815*	*10.1*	*227,009*	*10.3*
Bonds	●	○	●	◐	-	-	*161*	*0.0*
Property	◐	○	○	●	150,500	6.9	140,050	6.5
Bonds	●	○	●	◐	134,632	6.2	116,313	5.3
Cash	●	◐	●	○	65,439	3.0	42,756	1.9
Other investment assets	●	○	●	○	2,475	0.1	1,839	0.1
Other investment	●	○	●	○	(2,047)	(0.1)	(1,950)	(0.1)
					1,129,046	**51.7**	**1,072,126**	**48.9**
Insurance policies	◐	○	●	◐	901,700	41.1	940,700	42.7
Total DB investments					**2,188,866**	**100.0**	**2,200,489**	**100.0**
DC Sections								
Return seeking assets								
Pooled investment	●	◐	◐	◐	831,899	97.3	748,254	97.5
Equity					*587,214*	*68.7*	*538,824*	*70.2*
Bond					*110,014*	*12.9*	*93,654*	*12.2*
Property					*2,250*	*0.3*	*2,356*	*0.3*
Diversified growth					*119,501*	*13.9*	*101,875*	*13.3*
Cash					*12,920*	*1.5*	*11,545*	*1.5*
AVC investments	●	○	○	●	22,764	2.7	19,565	2.5
Total DC investments					**854,663**	**100.0**	**767,819**	**100.0**
Total investments					**3,043,529**		**2,968,308**	

In the above table, the risks affect the asset class ● significantly, ◐ partially, or ○ hardly/not at all.

11(h) INVESTMENT RISKS (continued)

I. Defined Benefit investment risks

The investment objective and strategy for the Defined Benefit Sections is set out on pages 26 to 28.

The Defined Benefit Sections' investments are valued at £2,189m (2024: £2,200m), as shown in the investment risk table on page 76.

Credit risk

The Defined Benefit Sections are subject to credit risk because they directly invest in bonds, insurance contracts, and have cash balances. The Defined Benefit Sections also invest in pooled investment vehicles and are therefore directly exposed to credit risk in relation to the instruments the funds hold within them, and directly to the investment in the QIAIF as the Plan is the sole investor in the bespoke QIAIF.

Direct credit risk has been mitigated in part by the insurance contracts, known as buy-ins, due to the fact that they are collateralised, with the collateral pool of assets held in the Trustee's name with a third-party custodian (see note 11(f)). In the event that an insurer was unable to make payment of the contracted, or in other agreed circumstances, the Trustee would have control of the collateral assets, thereby reducing the exposure to the insurers.

Direct credit risk arising from pooled investment vehicles is mitigated by the underlying assets of the pooled arrangements being ring-fenced from the pooled manager, the regulatory environments in which the pooled managers operate and the diversification of investments amongst a number of pooled arrangements.

Investment in the QIAIF is via a life insurance policy issued by a subsidiary of Legal & General Investment Management (LGIM). LGIM manage the assets which are owned by the subsidiary which writes only a small amount of pure life insurance to qualify as a life company and this is more than covered by its capital and reserves. The assets underlying the policy, therefore, are effectively ring-fenced.

As explained above, the Plan is the sole investor in the QIAIF, the Plan's liability driven investments, and is therefore directly exposed to the financial instruments held in the QIAIF which include UK gilts, repurchase agreements (repos), swaps and cash (see note 11(e)). The underlying instruments are collateralised on a daily basis, thus reducing the risk of counterparty default as far as is reasonably practicable. Given the level of collateral within the QIAIF, and that there is almost no gearing (borrowing to invest) in the Liability matching portfolio, the Trustee has been advised that the overall level of liquidity is sufficient and does not believe that tradability in regulated markets is a concern in relation to this investment; nonetheless, this is monitored regularly. Further information relating to collateral is included in note 11(e).

11(h) INVESTMENT RISKS (continued)

Credit risk (continued)

As at 31 December 2025, gearing in the LDI (QIAIF) was approximately 1% (2024: 1%) due to the investment manager's use of swaps (see note 11(e)). The Trustee aims to keep the leverage to a minimum in the liability matching portfolio.

The Plan is subject to direct credit risk through the segregated bond portfolio investment managed by Aegon Asset Management (see investment risk table on page 76). The Plan is able, with some restrictions, to invest in investment grade and sub-investment grade corporate bonds; the latter carrying greater credit risk, but having a higher yield to compensate investors. Credit risk is reduced by the restrictions placed by the Trustee under the contract which include only investing in BBB- or above and sector limits. Aegon Asset Management is also required to ensure the portfolio is highly diversified, thereby avoiding inappropriate risk concentrations.

Cash is held within financial institutions which are at least investment grade credit rated.

The Trustee carries out due diligence checks to ensure the legal structure is appropriate to the country of jurisdiction, there is sufficient security of assets and adequate diversification of investments. The investment consultant monitors any changes to the operating environment of the pooled managers on an ongoing basis.

A summary of pooled investment vehicles by type of legal structure is as follows:

	2025	2024
	£'000	£'000
DB Sections		
QIAIF	**557,232**	545,948
Open-ended investment companies	**61,881**	58,138
Shares in limited partnerships	**309,785**	348,878
Unit trusts	**7,221**	7,607
Mutual institution fund	**-**	161
	936,119	960,732

Indirect credit risk

Indirect exposure to credit risk arises from the underlying investments of the pooled investment vehicles including bonds, infrastructure, private equity, property, and trade finance (see the investment risk table on page 76).

The credit risk within the current strategy is managed by ensuring that guidelines are in place to ensure an appropriate overall level of credit quality and diversification of issuers and counterparties commensurate with the objectives of the investment. All investments held within the QIAIF are investment grade and all debtors under the Trade Finance fund are grade B and above.

11(h) INVESTMENT RISKS (continued)

Credit risk (continued)

Property (see note 11(c) and the investment risk table on page 76) is subject to the risk of the underlying tenant defaulting, hence preventing the receipt of cash flows. This risk is partially mitigated through diversification of tenant but also the ownership of the building which enables the property to be let to a different tenant or an alternative use to be employed should such a default occur. All properties within the portfolio are let to tenants with a high-quality covenant.

The Trustee receives regular reports from the managers setting out the extent of credit risk within their portfolios and, in particular, whether any agreed guidelines have been complied with.

Currency risk

The Defined Benefit Section investments are, for the most part, sterling denominated; however, currency risk remains in relation to the investment in the infrastructure funds, private equity funds and an investment through the property fund (see the investment risk table on page 76).

The infrastructure funds with foreign currency cash flows are exposed to currency risk as the payments are affected by fluctuations in exchange rates. The private equity fund has partial exposure to foreign currency, but forms part of a wider asset allocation strategy.

The Trustee is able to take a long-term view on currency risk and therefore can accept some of the short-term volatility in currency markets and avoid the costs associated with currency hedging. The Trustee will monitor this risk and has the ability to reduce the level of currency risk taken if deemed necessary.

Interest rate risk

Within the liability matching assets, the Defined Benefit Sections are exposed to interest rate risk because the Plan invests in bonds, insurance contracts, cash, swaps, and repurchase agreements through the buy-ins, infrastructure funds and the QIAIF (2024: bond fund, buy-ins, infrastructure funds and QIAIF), as shown in the investment risk table on page 76 and note 11(e). It is also exposed to direct interest rate risk through its segregated bond holdings as shown in the investment risk table on page 76.

Interest rate fluctuations will affect the valuations of both investments and actuarial liabilities (given that the Plan Actuary values actuarial liabilities with reference to the yield on UK government bonds).

11(h) INVESTMENT RISKS (continued)

Interest rate risk (continued)

If interest rates fall, the value of the insurance portfolio and liability matching assets will rise to help match the increase in actuarial liabilities arising from a fall in the discount rate. Similarly, if interest rates rise, the assets will fall in value, as will the actuarial liabilities because of an increase in the discount rate.

The Trustee, through the IC, requires that interest rate risk is regularly looked at and reported on, by requesting the monitoring of a quarterly report which highlights the expected effect of interest rate changes on the assets and actuarial liabilities. The sensitivities between the assets and actuarial liabilities are formally reviewed after each triennial valuation or if there are any significant changes to the profile of the actuarial liabilities, or major changes in investment markets. The Trustee and IC receive the support of the Plan Actuary and investment consultant in this regard.

As at 31 December 2025, the liability matching assets and insurance policies represented 93% (2024: 91%) of the total investment portfolio.

Other price risk

Other price risk arises principally in relation to the infrastructure funds and property funds within the return seeking portfolio (see the investment risk table on page 76). The purpose of accepting these risks is to ensure that, when considered as a whole, the assets of the Defined Benefit Sections form a suitably diversified portfolio in terms of the type of risk taken and the sources of expected future returns.

The Defined Benefit Sections' liabilities are often directly linked to inflation and the risk is that the assets do not also have this sensitivity. Liability driven investments are used to help mitigate this risk, by ensuring that the liability inflation sensitivity is matched to the highest extent possible. The buy-in insurance portfolio also mitigates this risk as the insurance policy guarantees to provide income for the pensions of the insured population, including inflationary increases prescribed in the Plan rules.

The property and certain infrastructure assets also assist in mitigating this risk as the underlying contracts and asset values are linked to inflation, thereby providing matching characteristics. The investment consultant reviews the portfolio position should sharp inflation fluctuations occur and the asset no longer matches the movement in the pension liability; however, most properties are subject to caps and floors similar to the RPI caps and floors in the rules for pension increases within the different sections for the Plan.

The Trustee receives regular reports from its investment consultant setting out the nature and extent of the risks in the Defined Benefit Sections investments.

11(h) INVESTMENT RISKS (continued)

II. Defined Contribution investment risks

The section below sets out the key direct and indirect risks to which the Defined Contribution Sections are exposed. An analysis of the funds held is provided in the investment risk table on page 76. The majority of holdings in the Defined Contribution Sections are held in the default lifecycle arrangement, as explained on page 23 with the associated risk described below.

Credit risk

The credit risk within the current strategy in theory arises from Aviva holding the funds provided through its platform and BlackRock as the underlying manager of majority of the funds.

As detailed within credit risk for Defined Benefit Sections above, direct credit risk is unlikely to exist within pooled arrangements that can be traded on the open market as the underlying assets of the pooled arrangements are ring-fenced. This is the case for all BlackRock and other funds available to Defined Contribution Section members. In addition, any residual risk is mitigated by investments in appropriately regulated vehicles. The Defined Contribution Sections investments in pooled investment vehicles are held in unit-linked insurance contracts.

Indirect credit risk is experienced through the underlying holdings in the investment platform. This is managed by ensuring that guidelines are in place for each manager to ensure an appropriate overall level of credit quality and diversification of issuers and counterparties commensurate with the objectives of the investment. All underlying bonds within the Defined Contributions Section funds are investment grade.

Market risk

The Defined Contribution Sections are subject to indirect currency, interest rate and other price risks associated with the underlying investments on the Aviva platform. These risks can affect the valuations of the underlying funds.

The equity fund has the majority of its holding in the Pearson Plan Bespoke Global Equity Fund which comprises the Aquila Life Global 3000 Fundamental Weighted Index Fund (31%), Aquila Life Global Minimum Volatility Fund (31%), iShares Emerging Markets Index Fund (4%), LGIM Low Carbon Transition Global Equity Fund (34%), (see page 22 of the Trustee's report) and its currency risk has largely been removed as a result of hedging within the fund, therefore the greatest market risk exposure impacting this fund is other price risk.

The main diversified growth fund held is the Blended Multi-Asset Fund (see page 22 of the Trustee's report) which provides an element of downside protection and therefore has lower risk than the equity funds; however, diversified growth funds are exposed to elements of foreign currency risk, interest rate risk, other price risk. and credit risk.

Bonds and cash funds are utilised when a member is near retirement and these are exposed to interest rate and credit risk; however, all of the underlying investments are investment grade. Further, the IC closely monitors the performance of the managers and receives formal quarterly reports from the investment consultant giving views on the managers' continued performance.

11 (i) SELF-INVESTMENT

In accordance with the Trustee's policy, no direct investments (2024: £Nil) were held in Pearson plc, or in companies in which Pearson plc held 20% or more of the equity share capital. However, the Plan's net assets at the 31 December 2025 include a de minimis amount of investments in Pearson plc through indirect investment holdings via the DC BlackRock UK Equity Index Tracker Fund which is less than 0.01% (2024: less than 0.5%) of the Plan's net assets; well below the 5% level permitted by legislation.

11(j) CONCENTRATION OF INVESTMENTS

The investments (other than UK Government Securities) at the year-end which are more than 5% of the total value of the net assets of the Plan comprise:

	2025		2024	
	£'000	**%**	£'000	%
DB Sections				
LGAS Buy-ins	**593,100**	**19.4**	619,000	20.7
Aviva Buy-in	**306,300**	**10.0**	319,200	10.7
LGIM QIAIF	**557,232**	**18.2**	545,948	18.3
Aberdeen Infrastructure Partners LP	**181,065**	**5.9**	186,328	6.2
DC Sections				
Pearson Pension Plan Bespoke Global Equity	**545,406**	**17.9**	-	-
BlackRock Blended Global Equity	**N/a**	**N/a**	500,221	16.7

12 INVESTMENT MANAGEMENT EXPENSES

	2025	2024
	£'000	£'000
Administration, management and custody	**471**	483
Advisory	**789**	754
	1,260	1,237

The administrative expenses associated with the operation of the Defined Contribution Sections are incurred by the Defined Benefit Sections and disclosed within the Defined Benefit Section of the Fund Account on page 57. The Plan Actuary has incorporated an estimation of the administrative costs, the life assurance provision and the reference scheme test underpin associated with this section within the funding arrangements for the Plan.

13. TAXATION

The Plan is a registered pension scheme under chapter 2 of part 4 of the finance act 2004 and is therefore exempt from income tax and capital gains tax. The tax charge in the Revenue Account represents irrecoverable withholding taxes arising on investment income.

14a CURRENT ASSETS AND LIABILITIES

Current Assets

	2025		
	DB Sections £'000	DC Sections £'000	**Total £'000**
Cash and cash equivalents	9,900	2,259	**12,159**
Pensions paid in advance	6,988	-	**6,988**
Amount due from DB to DC	-	3,347	**3,347**
VAT recoverable	2,023	-	**2,023**
Prepaid expenses and sundry items	473	-	**473**
	19,384	5,606	**24,990**

	2024		
	DB Sections £'000	DC Sections £'000	Total £'000
Cash and cash equivalents*	10,743	9,250	19,993
Cash held with Aviva	-	272	272
Pensions paid in advance	6,832	-	6,832
Amount due to DB from DC	4,944	-	4,944
VAT recoverable	2,045	-	2,045
Prepaid expenses and sundry items	412	-	412
	24,976	9,522	34,498

*The "DC Sections" current assets include £250k which is unallocated to members (2024: £250k).

14b Current Liabilities

	2025		
	DB Sections £'000	DC Sections £'000	**Total £'000**
Unpaid benefits	(331)	(1,570)	**(1,901)**
Accrued expenses:			
Administration	(2,070)	-	**(2,070)**
Investment management expenses	(166)	-	**(166)**
Amount due to DC from DB	(3,347)	-	**(3,347)**
Annuity income paid in advance	(6,709)	-	**(6,709)**
	(12,623)	(1,570)	**(14,193)**

	2024		
	DB Sections £'000	DC Sections £'000	Total £'000
Unpaid benefits	(468)	(884)	(1,352)
Accrued expenses:			
Administration	(2,473)	-	(2,473)
Investment management expenses	(200)	-	(200)
Amount due to DB from DC	-	(4,944)	(4,944)
Annuity income paid in advance	(6,718)	-	(6,718)
	(9,859)	(5,828)	(15,687)

15. TRANSFERS BETWEEN SECTIONS

Transfers between sections of £7.8m paid from the DC Sections to the DB Sections (2024: £1.3m paid from the DB Section to the DC Section) relate to funds that will be retained by the DB Section to pay out Money Purchase pensions set-ups and dependant pensions for death-in-service members amounting to £7.9m (2024: £5.6m), offset by RST payments for DC members of £0.11m (2024: £0.04m) funded by the Plan. In 2024 there were also DC employer contributions of £6.9m paid by the DB Section to the DC Section per the Schedule of Contributions certified 20 December 2023 and 1 July 2024; this was nil for 2025.

16. INVESTMENT COMMITMENTS

At 31 December 2025, there were the following capital commitments made by the Trustee relating to DB investments:

(a) up to £7,340k (2024: £8,577k) to Pantheon Ventures Limited to finance the private equity portfolio in future years. This commitment is expected to be partly funded by distributions from the private equity portfolio.

(b) Nil (2024: £1,850k) to EQT Infrastructure (No. 1) limited partnership, an infrastructure fund. This fund has been wound up during the year.

(c) Nil (2024; £3,638k) to Alinda Infrastructure Parallel Fund II, an infrastructure fund. This fund has been wound up during the year.

(d) Up to £9k (2024: £9k) to Aberdeen Infrastructure Partners LP Inc., an infrastructure fund.

Capital commitments mentioned above exclude recallable commitments and, where applicable, are translated into Sterling at the relevant spot rates ruling at the yearend date.

17. RELATED PARTY TRANSACTIONS

Pearson Pension Trustee Services Ltd (PPTS) employs the Plan's Trustee, administrative and accounting staff. Pearson Management Services Ltd (PMS) provides the Plan with accommodation and related services. The overall cost of these services to the Plan during the year was £4,273,810 (2024: £3,968,159), of which £128,691 (2024: £128,691) relates to accommodation and related services.

Fees paid to Trustee Directors of Pearson Pension Trustee Ltd (PPTL) during the year amounted to £245,683 (included in the above) (2024: £228,948). Expenses paid to Trustee Directors for costs incurred directly in the course of their duties during the year amounted to £nil (2024: £nil).

All Trustee Directors, with the exception of L Ruddick and J Plender, are also Plan members.

At 31 December 2025, the Plan owed PPTS £1,172,808 (2024: £1,115,209) and PMS £140,828 (2024: £53,621) due to the timing of invoicing and direct debits.

From 1 April 2023 Pearson Pension Trustee Ltd (PPTL) holds the controlling interest in Pearson Pension Trustee Services Ltd (PPTS).

The Plan's IT services charges charged by Pearson Shared Services Ltd (PSS) for the year were nil (2024: £31,312). These services were terminated in April 2024. At 31 December 2025, the Plan owed PSS £183,285 (2024: £259,990) in relation to these charges.

18. GMP EQUALISATION

On 26 October 2018, the High Court handed down a judgment involving the Lloyds Banking Group's defined benefit pension schemes. The judgment concluded that schemes should be amended to equalise pension benefits for men and women in relation to guaranteed minimum pension benefits. Under the ruling schemes are required to backdate benefit adjustments in relation to GMP equalisation and provide interest on the backdated amounts. The Plan is undertaking a detailed exercise to ensure members are receiving the correct GMP amount.

On 20 November 2020, the High Court gave a judgment on the issue of transferring schemes' liabilities to make up the shortfalls in the transfer values calculated and settled on the basis of unequalised GMPs.

Over the course of 2025 an exercise was largely completed to correct for the effects of unequal GMP for current members. Part of that exercise involved making payments to current members who required an uplift in respect of past pension payments; these back-payments totalled £5m and are recognised under "Pensions" in the benefits payable section of these financial statements. The most recent actuarial valuation (1 January 2024) included a reserve of £17m to correct GMP for current members (both back-payments and future uplifts). Adjusting this amount for the back-payments made in 2025, leaves a reserve of £12m for future uplifts. There was a further £2m reserve to cover corrections for members who have transferred out in the past.

A provision has not been recognised in the financial statements in respect of any future correction of backdated payments as it is expected to be immaterial and given the uncertainty surrounding the final amount.

THE PEARSON PENSION PLAN

TRUSTEE'S SUMMARY OF CONTRIBUTIONS PAYABLE

Contributions payable to the Plan in accordance with the Schedule of Contributions in respect of the year ended 31 December 2025 were as follows:

	2025 **£'000**
Employer normal contributions	22,400
Employer additional voluntary contributions	1,212
Members normal contributions	729
Total contributions paid under the Schedule of Contributions	24,341
Members additional voluntary contributions	1,656
Contributions disclosed in the financial statements (see page 62, note 3)	25,997

For and on behalf of Pearson Pension Trustee Limited.

Lynn Ruddick, Chair
Date:

Actuary’s certification of schedule of contributions

The Pearson Pension Plan

Adequacy of rates of contributions

1. I certify that, in my opinion, the rates of contributions shown in this schedule of contributions are such that the statutory funding objective could have been expected on 1 January 2024 to continue to be met for the period for which the schedule is to be in force.

Adherence to statement of funding principles

2. I hereby certify that, in my opinion, this schedule of contributions is consistent with the 2024 Statement of Funding Principles.

The certification of the adequacy of the rates of contributions for the purpose of securing that the statutory funding objective can be expected to be met is not a certification of their adequacy for the purpose of securing the Plan’s liabilities by the purchase of annuities, if the scheme were to be wound up.

Signature	**Date** 18 March 2025
Name Steve Leake Plan Actuary	**Qualification** Fellow of the Institute and Faculty of Actuaries
Address XPS Group Tempus Court Onslow Street Guildford GU1 4SS	**Employer** XPS Pensions Consulting Limited

Actuary’s certification of schedule of contributions

The Pearson Pension Plan

Adequacy of rates of contributions

1. I certify that, in my opinion, the rates of contributions shown in this schedule of contributions are such that the statutory funding objective could have been expected on 1 January 2024 to continue to be met for the period for which the schedule is to be in force.

Adherence to statement of funding principles

2. I hereby certify that, in my opinion, this schedule of contributions is consistent with the 2024 Statement of Funding Principles.

The certification of the adequacy of the rates of contributions for the purpose of securing that the statutory funding objective can be expected to be met is not a certification of their adequacy for the purpose of securing the Plan’s liabilities by the purchase of annuities, if the scheme were to be wound up.

Signature	**Date** 12 January 2026
Name Steve Leake Plan Actuary	**Qualification** Fellow of the Institute and Faculty of Actuaries
Address XPS Group Tempus Court Onslow Street Guildford GU1 4SS	**Employer** XPS Pensions Consulting Limited

THE PEARSON PENSION PLAN

REPORT ON ACTUARIAL LIABILITIES

Under Section 222 of the Pensions Act 2004, every scheme is subject to the Statutory Funding Objective, which is to have sufficient and appropriate assets to cover its technical provisions. The technical provisions represent the present value of the benefits members are entitled to based on pensionable service to the valuation date. This is assessed using the assumptions agreed between the Trustee and the Employer and set out in the Statement of Funding Principles, which is available to Plan members on request.

The most recent full actuarial valuation of the Plan was carried out as at 1 January 2024

The value of the technical provision was: £2,929 million

The value of the assets at that date was: £3,183 million

The methods and significant actuarial assumptions used to determine the technical provisions are as follows (all assumptions are set out in the Statement of Funding Principles):

Method

The actuarial method to be used in the calculation of the technical provisions is the Projected Unit Method.

Discount interest rate: term dependent rates set by reference to the BoE gilt curve plus 0.25% p.a. at the valuation date for non-pensioners and BoE gilt curve at the valuation date for pensioners.

Future retail price inflation: term dependent rates set by reference to the BoE gilt RPI inflation curve.

Future consumer price inflation: term dependent rates derived from the assumption for future retail price inflation less an adjustment equal to 1.0% p.a. pre 2030 and future retail price inflation less an adjustment equal to 0.0% p.a. post 2030.

Pension increases: Set using the assumed rate of future inflation and a Black-Scholes model with inflation volatility of 1.5% per annum for RPI linked increases and 1.0% for CPI linked increases for pension payments and term dependent rates for the future retail price inflation with relevant caps and floors for deferred pension before retirement.

Pay increases: general pay increases of 0.5% p.a. above the term dependent rates for the future retail price inflation.

Mortality: for the period in retirement, standard S4 tables with a scaling factor of 94% for all male and 86% for female members, 102% for all male and 100% all female dependants. In addition, there is an allowance for future improvements in line with the CMI 2022 projection model with 1.6% per annum long term improvements, a smoothing factor of 7.0 and an initial addition of 0.2% with 30% weighting to the 2022 mortality data.

THE PEARSON PENSION PLAN
STATEMENT OF INVESTMENT PRINCIPLES

1. Introduction

This Statement of Investment Principles ("SIP") has been prepared by the Trustee of the Pearson Pension Plan. It sets out the Trustee's policies on various matters governing investment decisions for the Pearson Pension Plan ("the Plan"), which has Final Pay and Defined Contribution ("DC") sections. This SIP also covers the Additional Voluntary Contribution arrangements ("AVCs").

This SIP replaces the previous SIP dated 4 December 2024.

This SIP has been prepared after obtaining and considering written advice from LCP, the Plan's investment adviser, whom the Trustee believe to be suitably qualified and experienced to provide such advice. The advice considered the suitability of investments including the need for diversification given the circumstances of the Plan and the principles contained in this SIP.

The Trustee has consulted with the plan sponsor in producing this SIP.

The Trustee will review this SIP from time to time and will amend it as appropriate. Reviews will take place without delay after any significant change in investment policy in the demographic profile of the members invested in the DC default investment option and at least once every three years.

This SIP contains the information required by legislation, and also considers the Pension Regulator's guidance on investments.

2. Investment objectives for the Final Pay and DC Sections

The primary objective for the **Final Pay Sections** is to ensure that the benefit payments are met as they fall due. In addition to this primary objective, the Trustee has the following objectives:

- An overall objective to invest the Plan's assets in such a way that sufficient money is available to meet the liability to provide benefits to the members of the Plan into the future. This includes, where possible and agreed with the Principal Employer, discretionary increases to pensions in payment in excess of the guarantees in the Plan Rules, so that total pension increases over time broadly aim to protect against cost of living increases.
- As a precondition of the above, the Trustee will endeavour to invest the Plan's assets to achieve returns in excess of the growth in the liabilities, whilst maintaining a prudent approach to meeting the Plan's liabilities.

The Trustee's primary objectives for the **DC Sections** are to:

- Provide an appropriate range of investment options, reflecting the membership profile of the DC sections and the variety of ways that members can draw their benefits in retirement;
- Provide clear information on the investment options and their characteristics that will allow members to make informed choice and;
- Provide a default investment option that the Trustee believes to be reasonable for those members that do not wish to make their own investment decisions.

The Plan Trustee is required to designate a default arrangement into which members who are automatically enrolled are invested. The Trustee has designated the Drawdown Lifecycle as the main DC default arrangement for the Plan. The objective of the Drawdown Lifecycle is to generate returns above inflation whilst members are some distance from retirement, but then to switch automatically and gradually to investments that more closely match the intentions of members.

This is also the default arrangement for AVC assets for new and existing members that have assets invested in the Money Purchase and Auto Enrolment sections.
This does not apply, however, to AVC benefits where the member has no assets already invested in the Drawdown Lifecycle through the Money Purchase or Auto Enrolment sections, or is a DB member with AVC benefits but no assets in these aforementioned DC sections.

The Trustee has designated the Cash Lifecycle as the default arrangement for AVC assets within the Plan where existing members do not have assets invested in the Money Purchase and Auto Enrolment sections, or are DB members with AVC benefits who do not have assets invested in the Money Purchase or Auto Enrolment sections of the Plan.

Additionally, there is a legacy default option, the Annuity Lifecycle, which remains a lifecycle option for members to select. This option targets the purchase of an annuity at retirement.
The aim and objective of all the default Lifecycle strategies is to provide members with the potential for higher levels of growth during the accumulation of their retirement savings though exposure to equity and diversified growth funds ("DGFs") and then to gradually diversify their investments in the years approaching retirement. The asset allocation throughout the default Lifecycles and the phasing of the gradual switching of investments aims to take into account members' greater capacity for risk early on and reduced capacity for risk closer to retirement. Each option is designed to reflect the Trustee's belief that most members in that strategy will take their benefits in the specified form.

A default was also created as a result of temporary suspension of the Threadneedle Pensions Property Fund. This default option is a fixed allocation to the BlackRock Sterling Liquidity Fund and targets cash withdrawal at retirement, since the Trustee believes this is the most appropriate alternative for these contributions given the temporary suspension of the Property Fund and the inability for the Trustee to exercise members' choice to invest in the Property Fund for any contributions invested during the suspension period. The aims and objectives are that the fund aims to maximise current income consistent with the preservation of capital and liquidity through the maintenance of a portfolio of high quality short-term money market instruments and to achieve an investment return that is in line with its benchmark.

The Pearson Plan Bespoke Global Equity Fund is also considered a default option. The Trustee agreed that this fund would replace the Blended Global Equity Fund in the lifecycles and the self-select range. All assets invested in the Blended Global Equity Fund are planned to be transferred to the Pearson Plan Bespoke Global Equity Fund on 30 September 2025.The Pearson Plan Bespoke Global Equity Fund aims to provide returns consistent with the composite benchmark by investing in a range of funds that provide exposure to global equities, including emerging market equities.

Some of the DC members are impacted by a Reference Scheme Test ("RST") underpin.
All policies relating to the **DC default options** are covered in this SIP, rather than in a separate SIP, so all policies on the Plan's investments are in one document.

The Trustee's investment objective for the AVCs is to make available a suitable range of investment options to meet members' risk / return objectives.

This is also the default arrangement for AVC assets for new and existing members that have assets invested in the Money Purchase and Auto Enrolment sections.
This does not apply, however, to AVC benefits where the member has no assets already invested in the Drawdown Lifecycle through the Money Purchase or Auto Enrolment sections, or is a DB member with AVC benefits but no assets in these aforementioned DC sections.

The Trustee has designated the Cash Lifecycle as the default arrangement for AVC assets within the Plan where existing members do not have assets invested in the Money Purchase and Auto Enrolment sections, or are DB members with AVC benefits who do not have assets invested in the Money Purchase or Auto Enrolment sections of the Plan.

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The Pearson Plan Bespoke Global Equity Fund is also considered a default option. The Trustee agreed that this fund would replace the Blended Global Equity Fund in the lifecycles and the self-select range. All assets invested in the Blended Global Equity Fund are planned to be transferred to the Pearson Plan Bespoke Global Equity Fund on 30 September 2025.The Pearson Plan Bespoke Global Equity Fund aims to provide returns consistent with the composite benchmark by investing in a range of funds that provide exposure to global equities, including emerging market equities.

Some of the DC members are impacted by a Reference Scheme Test (“RST”) underpin.
All policies relating to the **DC default options** are covered in this SIP, rather than in a separate SIP, so all policies on the Plan’s investments are in one document.

The Trustee’s investment objective for the AVCs is to make available a suitable range of investment options to meet members’ risk / return objectives.

3. Investment strategy

With input from the Plan’s advisers and in consultation with the Plan sponsor, the Trustee reviewed the investment strategy for the Final Pay and DC Sections in August 2022, considering the objectives described in Section 2. Asset allocation is considered regularly by the Trustee and reviewed in detail following each actuarial valuation, taking into account the objectives described in Section 2 above.

The Trustee divides the assets of the Final Pay Sections of the Plan into two sections, the **Insurance Portfolio** and the **Main Portfolio,** which are composed as follows:

- The **Insurance Portfolio** consists of assets which are held in the form of insurance contracts matching a portion of the liabilities of the Plan.

  The insurer pays the Plan an amount equal to the pension payment in respect of the members underlying the policy. These insurance contracts, known as buy-in policies are assets of the Plan and the pension liability remains within the Plan.

  Towards the end of 2017 the Plan purchased two separate buy-in policies. The two policies covered approximately two thirds of the pensioner members’ liabilities at the time of the transactions. The Plan purchased a further buy-in policy in February 2019 which covered most of the remaining uninsured pensioner members’ liabilities at the time of the transaction.
- The **Main Portfolio** consists of all Plan assets outside of the Insurance Portfolio. The Main Portfolio is composed of **Matching** and **Return Seeking** assets.
  - The **Matching Assets** are those which produce cashflows that can be expected to match the Plan’s liabilities for a portion of the membership. The Matching Assets include bonds, inflation-linked property and infrastructure.
- The **Return Seeking Assets** are invested with a long-term horizon to generate the returns needed to provide the remaining expected cashflows for the beneficiaries. This portfolio is invested in a diversified portfolio of return seeking assets. The Return Seeking Assets are expected to consist of an allocation to trade finance, infrastructure, private equity and property.
- The Plan’s total allocation as at 31 December 2024 was c.92% to the Insurance portfolio and Matching Assets and c.8% to Return Seeking Assets. The actual allocation depends on the relevant market values and so will fluctuate over time.

This is a low-risk asset allocation which maintains a low probability of requiring further contributions from the Plan's Sponsor. The primary focus of the Plan's allocation of investments is accurate cashflow matching and risk control.

The Insurance Portfolio is cashflow matching as it provides payments which are expected to exactly match the benefit payments for the insured members.

A small allocation to Return Seeking Assets has been maintained in the Plan's asset allocation to provide a buffer for any changes in actuarial assumptions, longevity risk, and potentially to allow for discretionary increases to members in certain scenarios.

Based on asset-liability modelling as at 31 March 2025, the Plan’s invested assets (excluding the Insurance Portfolio), are expected to generate a return of 1.2% per annum above gilts with an acceptable level of volatility. The Plan's investment strategy is reviewed and modelled following each Actuarial Valuation. The allocation to each asset class will vary due to market movements and will be kept under review by the Trustee.

4. Considerations in setting the investment arrangements

When deciding how to invest the Plan's assets, it is the Trustee's policy to consider a range of asset classes, taking account of the expected returns and risks associated with those asset classes, as well as the Trustee's beliefs about investment markets and which factors are most likely to impact investment outcomes.
The primary ways that the Trustee manages investment risk are via diversification, having received professional written advice prior to making any material investment decision, and ongoing monitoring and oversight of the investments. For the Final Pay Sections investment risk is measured using "Value at Risk". For the DC Sections investment risk is measured as standard deviation.

In setting the strategy for the **Final Pay Sections** it is the Trustee's policy to consider:

- the best interests of members and dependents;
- the Plan's investment objectives, including the target return required to meet the Trustee's investment objectives;
- the Plan's cash flow requirements in order to meet benefit payments in the near to medium term;
- the circumstances of the Plan, including the profile of the benefit cash flows (and the ability to meet these in the near to medium term), the funding level, and the strength of the employer covenant;
- the risks, rewards and suitability of a number of possible asset classes and investment strategies and whether the return expected for taking any given investment risk is considered sufficient given the risk being taken; and
- the need for appropriate diversification between different asset classes to ensure that both the Plan's overall level of investment risk and the balance of individual asset risks are appropriate.

In determining the investment arrangements for the **DC Sections including the default options** and for the AVCs it is the Trustee's policy to consider:

- the best interest of members and beneficiaries;
- the profile of the membership and what this is likely to mean for the choices members might make upon reaching retirement;
- the risks, rewards and suitability of a number of possible asset classes and lifecycle strategies and whether the return expected for taking any given investment risk is considered sufficient.
- the need for appropriate diversification within the default strategies and other lifecycle options to ensure that, for each such option, both the overall level of investment risk and the balance of individual asset risks are appropriate;
- the need for appropriate diversification within the other investment options offered to members.

The Trustee also considers any other factors which it believes to be financially material over the applicable time horizons to the funding of the Final Pay Sections, DC and AVC benefits, including environmental, social and governance ("ESG") factors and the risks and opportunities relating to climate change.

The Trustee's key investment beliefs, which influenced the setting of the investment arrangements, are as follows:

- asset allocation is the primary driver of long-term returns;
- fund management costs may have a significant impact on long-term performance and therefore obtaining value for money from the investments is important;
- investment managers who can consistently spot and profitably exploit market opportunities are difficult to find, and therefore passive management is often better value;
- risk-taking is necessary to achieve return, but not all risks are rewarded. Equity, credit, and illiquidity are the primary rewarded risks. Risks that do not have an expected reward should generally be avoided, hedged, or diversified;
- ESG factors should be considered when making investment decisions, and managers may be able to improve risk-adjusted returns by doing this; and
- systemic issues including climate change and nature loss are financially material and present risks and opportunities for the Plan over the short, medium and long term.

5. Implementation of the investment arrangements

Before investing in any manner, the Trustee obtains and considers proper written advice from its investment adviser as to whether the investment is satisfactory, having regard to the need for suitable and appropriately diversified investments.

The Trustee has signed agreements with the investment managers (in respect of the Final Pay sections), and a platform provider in respect of the DC Section, setting out the terms on which the portfolios are to be managed. The DC platform provider makes available the range of investment options to members. There is no direct relationship between the Plan and the underlying managers of the DC investment funds.

The Trustee and investment managers to whom discretion has been delegated exercise their powers to give effect to the principles in this Statement of Investment Principles, so far as is reasonably practical.

The Trustee's view is that the fees paid to the investment managers, and the possibility of their mandate being terminated, ensure they are incentivised to provide a high quality service that meets the stated objectives, guidelines and restrictions of the fund. However, in practice managers cannot fully align their strategy and decisions to the (potentially conflicting) policies of all their pooled fund investors in relation to strategy, long-term performance of debt/equity issuers, engagement and portfolio turnover.

It is the Trustee's responsibility to ensure that the managers' investment approaches are consistent with its policies before any new appointment, and to monitor and to consider terminating any existing arrangements that appear to be investing contrary to those policies. The Trustee expects investment managers, where appropriate, to make decisions based on assessments of the longer term financial and non-financial performance of debt/equity issuers, and to engage with issuers to improve their performance. It assesses this when selecting and monitoring managers.

The Trustee evaluates investment manager performance by considering performance over both shorter and longer-term periods as available. Except in closed-ended funds where the duration of the investment is determined by the fund's terms, the duration of a manager's appointment will depend on strategic considerations and the outlook for future performance. Generally, the Trustee would be unlikely to terminate a mandate on short-term performance grounds alone.

The Trustee's policy is to evaluate each of its investment managers by reference to the manager's individual performance as well the role it plays in helping the Plan meet its overall long-term objectives, taking account of risk, the need for diversification and liquidity. Each manager's remuneration, and the value for money it provides, is assessed in light of these considerations.

The Trustee recognises that portfolio turnover and associated transaction costs are a necessary part of investment management and that the impact of portfolio turnover costs is reflected in performance figures provided by the investment managers. The Trustee expects its investment consultant to incorporate portfolio turnover and resulting transaction costs as appropriate in its advice on data related to the Plan's investment mandates.

6. Realisation of investments

For the Final Pay Sections, in general, individual investment managers have discretion in the timing of the purchase and sale of investments and in consideration relating to the liquidity of those investments.

The Trustee, and investment managers (to the extent delegated), will use the criteria set out in the Occupational Pension Schemes (Investment) Regulations 2005, when selecting investments on behalf of the Plan. The Trustee expects the investment managers to give effect to the principles in this statement as far as is reasonably practical.

The Trustee has agreed a series of investment restrictions for each manager where there is a separate Investment Management Agreement (IMA) in place. The Trustee will monitor the continuing tenure of the Investment Managers, including the competitiveness of their fee structures, from time to time, based on advice from the Investment Committee (IC) and the external investment adviser. The Trustee will also utilise compliance reporting provided by the custodian, Bank of New York Mellon, in the monitoring of Investment Managers.

For the DC Sections including the default, the Trustee's policy is to invest in funds that offer daily dealing to enable members to readily realise and change their investments. The default includes an allocation to DGFs via pooled funds (a type of collective investment scheme), that may include an allocation to illiquid assets (of direct property and infrastructure) if the DGF manager chooses to do so. As at September 2023, the exposure to the illiquid assets of direct property and infrastructure constituted around 5% of the DGF allocation. Members from 15 years to retirement (age 47 and above assuming a retirement age of 62) who are invested in the default have exposure to illiquid assets via the DGF allocation.

We believe that long-term net risk-adjusted investment returns may be improved by investing in illiquid assets. However, investment in illiquid assets in DC pension schemes is a relatively new and developing area. Therefore, at this time, it is the Trustee's policy not to invest the DC default in illiquid assets other than via the DGFs. But, with the support of its investment advisers, the Trustee intends to consider investment in more specific illiquid assets as and when appropriate (e.g. as part of default strategy reviews) and in the context of the Plan.

7. Financially material considerations and non-financial matters

The Trustee believes that environmental, social and governance (ESG) factors may be an area of market inefficiency.

The Trustee has considered how ESG and ethical factors should be taken into account in the selection, retention and realisation of investments, given the time horizon of the Plan and its members. The Trustee expects its investment managers to take account of financially material considerations (including climate change and other ESG considerations). The Trustee seeks to appoint managers that have appropriate skills and processes to do this, and from time to time reviews how its managers are taking account of these issues in practice.

The Trustee has limited influence over managers' investment practices where assets are held in pooled funds, but it encourages its managers to improve their practices where appropriate within the parameters of their funds.

The DC sections include an equity investment option focused on ESG risks as a choice for members to select if they wish to. A small number of members also remain invested in an alternative option which takes account of ESG risks; however, this alternative fund option is now closed to new members. The short duration credit fund, which is both available for members to select and part of the default investment strategy, has an explicit commitment to sustainability in its investment objective. At this time, the Trustee does not believe there are any additional ESG-focused investment options available that meet members' needs appropriately in any other asset classes but will keep this under review.

The Trustee does not consider any non-financial matters (ie matters relating to the ethical and other views of members and beneficiaries, rather than considerations of financial risk and return) in the selection, retention, and realisation of investments. However, it recognises the importance of offering a suitable range of investment options for members who wish to express an ethical preference in their pension saving and so has suitable options available.

The IC proactively monitors all of the Plan's investment managers. In addition to the usual quarterly monitoring, the investment managers are required to attend either the IC or the Alternative Investment Boad meetings periodically. These Manager presentations provide an opportunity to discuss responsible investment along with other aspects of the manager's mandate and are considered an important aspect of these discussions.

In addition to the above the IC also undertakes the following:

- When appointing new active investment managers, their approach to socially responsible investment and environmental, social and governance factors is incorporated into the selection process and referenced in their Investment Management Agreements.
- The IC reviews the Plan's approach to responsible investment, typically once a year. The latest investment manager policies are also reviewed and developments in responsible investment are discussed.
- The Plan monitors whether its Investment Managers are signatories of the UN Principles for Responsible Investment (PRI). The IC encourages investment managers to become PRI signatories and requests explanations where they are not.

8. Voting and engagement

The Trustee recognises its responsibilities as an owner of capital, and believes that good stewardship practices, including monitoring and engaging with investee companies, and exercising voting rights attaching to investments, protect and enhance the long-term value of investments. The Trustee has delegated to its investment managers the exercise of rights attaching to investments, including voting rights, and engagement with issuers of debt and equity and other relevant persons about relevant matters such as performance, strategy, capital structure, management of actual or potential conflicts of interest, risks and ESG considerations.

The Trustee does not monitor or engage directly with issuers or other holders of debt or equity. It expects the investment managers to exercise ownership rights and undertake monitoring and engagement in line with the managers' general policies on stewardship, as provided to the Trustee from time to time, considering the long-term financial interests of the beneficiaries. The Trustee expects the managers to communicate their policies on stewardship to them from time to time, and provide them with reports on the results of their engagement and voting activities at least once a year.

The Trustee seeks to appoint managers that have strong stewardship policies and processes, reflecting where relevant the recommendations of the UK Stewardship Code issued by the Financial Reporting Council, and from time to time the Trustee reviews how these are implemented in practice.

Implementation Statement, covering 1 January 2025 to 31 December 2025

The Trustee of The Pearson Pension Plan (the "Plan") is required to produce a yearly statement to set out how, and the extent to which, the Trustee has followed its Statement of Investment Principles ("SIP") during the year, as well as details of any review of the SIP during the year, subsequent changes made with the reasons for the changes, and the date of the last SIP review. Information on the last review of the SIP is provided in Section 1. Information on the implementation of the SIP is provided in Sections 2 to 11.

The Statement is also required to include a description of the voting behaviour during the Plan year by, and on behalf of, the Trustee (including the most significant votes cast by the Trustee or on its behalf) and state any use of the services of a proxy voter during that year. This is provided in Section 12 below.

In preparing the Statement, the Trustee has had regard to the guidance on Reporting on Stewardship and Other Topics through the SIP and the Statement, issued by the Department for Work and Pensions ("DWP's guidance") in June 2022.

This Statement is based on and uses the same headings as the Plan's SIP dated September 2025 (the latest version at the time of writing), and the previous SIP dated December 2024. This Statement should be read in conjunction with the latest SIP and Investment Policy Implementation Document ("IPID") which can be found here and here.

1. Introduction

The SIP was reviewed and updated during the Plan year in September 2025 to reflect the following:

- the closure of the Blended global equity fund and transfer of member assets to the Bespoke global equity fund;
- the allocation to the Bespoke global equity fund within the lifecycles, replacing the Blended global equity fund;
- updated values for the Plan's Insurance Portfolio and Main Portfolio.

As part of the SIP updates, the employer was consulted and confirmed it was comfortable with the changes.

No changes were made to the voting and engagement policies in the SIP during the Plan year.

The Trustee has, in its opinion, followed all the policies in the Plan's SIP during the year.

2. Investment objectives

2.1. Defined Benefit ("Final Pay") Sections

Progress against the long-term funding target was reviewed as part of the quarterly monitoring reports. The Trustee is also able to view the progress on an ongoing basis using an online tool provided by the Plan Actuary, which shows key metrics and information on the Plan.

2.2. Money Purchase and Auto Enrolment Sections (Defined Contribution ("DC") Sections)

As stated in the SIP, the Trustee has an objective to provide an appropriate range of investment options, reflecting the membership profile of the DC sections and the variety of ways that members can draw their benefits in retirement. The Trustee remains satisfied that the range of investment options provided to members is appropriate, having carried out a detailed strategic review of the range in 2023, and from monitoring the performance of the range via quarterly reports provided by its investment advisers. There were changes made to the investments in 2025, as detailed in section 3.2.

The Trustee is required to designate a default arrangement into which members who are automatically enrolled are invested and has an objective that this should be reasonable for those members that do not wish to make their own investment decisions. The Drawdown Lifecycle is the main default arrangement. This is also the default for Additional Voluntary Contribution ("AVC") assets for new and existing members that have assets invested in the Money Purchase and Auto Enrolment sections. This does not apply, however, to AVC benefits where the member has no assets already invested in the Drawdown Lifecycle through the Money Purchase or Auto Enrolment sections, or is a DB member with AVC benefits but no assets in these aforementioned DC sections.

The Trustee has made available two additional lifecycles: the cash lifecycle and the annuity lifecycle (which targets annuity purchase at retirement). The cash lifecycle is the default arrangement for members who make AVCs and do not have assets invested in the drawdown lifecycle through the DC Sections, and for DB members who make AVCs, but have no benefits in the DC Sections. Some of the funds have become deemed default arrangements due to the non-consent transfer of member assets into them and this is explained in the SIP.

The Trustee generally reviews the default arrangements on a triennial basis. The default was not reviewed during the period covered by this Statement. Post year end (in March 2026), a review of the default arrangements took place (the self-select fund range was not covered in this review). The Trustee reviewed the membership demographics and were satisfied that the default arrangements remained appropriate and reasonable for those members that do not wish to make their own investment decisions.

The Trustee also has an objective to provide clear information on the investment options and their characteristics that will allow members to make an informed choice. The Trustee carries out an annual value for members review and part of this is to consider member communications. The Trustee's investment adviser's value for members report of 2 June 2025 rated the communications as very good.

3. Investment strategy

3.1. Final Pay Sections

The Trustee has not made any changes to DB investment strategy over the Plan year. The Trustee monitors the asset allocation as part of the quarterly monitoring reports, and it is understood that the allocation to each asset class will vary, due to market movements. The Trustee makes sure the Plan's assets are adequately and appropriately diversified between different asset classes.

3.2. Defined Contribution Sections

Arising from discussions when the previous triennial DC investment strategy review took place in 2023, changes to the equity fund and the multi-asset fund used in the lifecycle investment strategies were agreed by the Trustee and were implemented in September 2025:

- A new fund called the Bespoke global equity fund was created. The previous main equity fund used in the lifecycle strategies, the Blended global equity fund, was restructured to disinvest one of its underlying funds. The Blended global equity fund was then incorporated into the Bespoke global equity fund and given a 66% target allocation within it. The other 34% was allocated to a new fund, the L&G low carbon transition global equity index fund, to better incorporate consideration of climate risk into the investment strategy.
- The Baillie Gifford multi-asset fund was removed from the Blended multi-asset fund (33% of its assets). It was replaced with an equal target allocation to the Bespoke global equity fund and the BlackRock sterling short duration credit fund.

The investment strategy of the DC arrangements was not reviewed during the period covered by this statement. Post year end, the Trustee, with the help of its advisers, reviewed the investment strategy of the default arrangements in March 2026. This review included membership demographics analysis. The performance and strategy of the default arrangements were also reviewed to check whether investment returns (after deduction of charges and costs) have been consistent with the aims and objectives as stated in the SIP, and to check that they continue to be appropriate given the Plan's risk profiles and membership. Based on the membership analysis and advice provided by its investment advisers, the Trustee concluded that the drawdown lifecycle remained the most appropriate default for members in the DC Sections and members with both DC and DB AVC assets. The cash lifecycle remains appropriate for DB AVC members.

4. Considerations in setting the investment arrangements

The Trustee last formally reviewed its investment beliefs in the Final Pay Section in May 2022, when the Trustee made the allocation to trade finance. At the time, it had considered the investment risks set out in Part 2 of the IPID. It also considered a wide range of asset classes for investment, considering the expected returns and risks associated with those asset classes as well as how these risks can be mitigated.

When the Trustee undertook a performance and strategy review of the DC default arrangements in 2023 and 2026, it considered the key investment beliefs as set out in the SIP and investment risks set out in Part 2 of the IPID. The Trustee previously considered the extent to which Environmental, Social and Governance ("ESG") climate factors are incorporated in the funds currently available in the DC Section of the Plan, and where enhancements can be made. The Trustee also conducted climate scenario analysis during the previous Plan year to understand the key climate-related risks and opportunities faced by the Plan and how these can be managed in the investment strategy. Following this, the Trustee agreed to add an allocation to low-carbon equities to the lifecycles via the Bespoke global equity fund, and this was implemented in September 2025.

4.1. Policy towards risk

Risks are monitored on an ongoing basis with the help of the investment adviser. The Trustee maintains a risk register and this is discussed annually. The Trustee’s policy on risks is set out further in Section 10.

The Plan's interest and inflation hedging levels are monitored on an ongoing basis in the quarterly monitoring report. Over the Plan year, the Plan's hedging levels were broadly in line with the target levels.

With regard to collateral adequacy risk, the Trustee holds investments in the Legal and General Investment Management Sterling Liquidity Fund alongside the Liability Driven Investments (“LDI”) portfolio, to be used should the LDI manager require cash to be posted for a deleverage event. The Trustee aims to hold sufficient value to cover the deleverage event of the LDI portfolio in these liquid assets. As at the Plan year end, the Plan held more than enough liquid assets to meet the next capital call on the LDI funds. Note the LDI portfolio utilises minimal / no leverage.

Together, the investment and non-investment risks give rise generally to funding risk. The Trustee also informally monitors the funding position more regularly, on a quarterly basis at Trustee meetings, and the Trustee has the ability to monitor this daily on LCP Visualise.

The Trustee also considers financially material risks, including environmental, social and governance (ESG) factors and climate-related risks, as part of its overall risk management framework. These risks may impact the Plan’s investments over the short, medium and long term.

In respect of the DC Sections, the Trustee monitors risk via the quarterly reports provided by its investment adviser. These reports show the risk (volatility of returns) of key asset classes over the year and the risk levels of each part of the lifecycle strategies over one and three years. The Trustee is comfortable that the lifecycle risk levels are reasonable given the market environment over 2025, and that the lifecycles have reduced risk as intended for members closer to retirement (risk levels increased for members close to retirement in the Annuity lifecycle, but this reflects the volatile bond markets, and hence volatile annuity prices over the year).

5. Implementation of the investment arrangements

In 2025 the Trustee implemented allocations to the L&G low carbon transition global equity index fund and the BlackRock sterling short duration credit fund, within the Bespoke global equity and Blended multi-asset funds respectively. Before making changes, the Trustee received information and formal written advice from its investment adviser. The Trustee relies on its investment adviser’s research to understand managers’ investment approaches and ensures they are consistent with the Trustee’s policies prior to any new appointment.

The Trustee invests for the long term, to provide the pension benefits for the Plan’s members and dependents. To achieve good outcomes for members and beneficiaries over this investment horizon, the Trustee therefore seeks to appoint managers whose stewardship[1] activities are aligned to the creation of long-term value and the management of long-run systemic risks, including ESG and climate-related risks.

The Plan's investment advisers monitor all the investment managers on an ongoing basis, through regular research meetings. The investment advisers monitor any developments at the managers and inform the Trustee promptly about any significant updates or events they become aware of that may affect the managers' ability to achieve their investment objectives. This includes any significant change to the investment process or key staff for any of the funds the Plan invests in, or any material change in the level of diversification in the funds. No significant concerns have been raised in relation to the majority of the Plan’s current investment managers over the year other than those funds noted below.

The Trustee monitors the performance of the Plan’s investment managers on a quarterly basis, using the quarterly monitoring reports. Both the Final Pay report and the DC Section report showed the performance of each manager over the 1 year, 3 and 5 years. Performance is considered in the context of the manager’s benchmark and objectives. The Trustee also monitors its managers’ responsible investment capabilities using scores provided by its investment adviser, on a quarterly basis as part of the standard monitoring reports as well as a more detailed annual review of each manager’s ESG and stewardship practices.

[1] The responsible allocation, management, and oversight of capital to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society.

The Trustee evaluates manager performance over both shorter and longer periods, encourages managers to improve practices, and considers alternative arrangements where managers are not meeting performance objectives. The Trustee remained comfortable with the majority of its investment manager arrangements over the year.

The Trustee also previously reviewed investment options that incorporate ESG and/or climate-related matters, to determine if they would be suitable for inclusion in the DC Sections of the Plan. As previously mentioned, the Trustee agreed to incorporate a low carbon equity allocation as part of the transition from the Blended global equity fund to the Pearson Bespoke global equity fund during 2025.

The Trustee's advisers carried out a value for members assessment in May 2026 for the Plan year to 31 December 2025. This considered a range of factors, including the fees payable to managers in respect of the DC Section, which were found to be reasonable when compared against schemes with similar sized mandates.

During the year, the Trustee also carried out an annual assessment of the Final Pay investment managers' fees. Overall, the Trustee believes the investment managers provide reasonable value for money, and the Trustee continues to work with its investment adviser to achieve competitive fees for its investment mandates.

6. Realisation of investments

6.1. Final Pay Sections

The Trustee reviews the Plan's net current and future cashflow requirements on a regular basis. The Trustee's policy is to have access to sufficient liquid assets to meet any outflows while maintaining a portfolio which is appropriately diversified across a range of factors, including a suitable balance between both liquid and illiquid assets.

The Trustee receives income from the Plan's illiquid property, infrastructure investments and buy-in providers, which is retained in the Trustee bank account and used towards paying benefit payments. The Trustee also receives income from the bonds held in the short duration credit portfolio. This is retained as cash within the portfolio, so that it can be used to help meet benefit payments, if required, or reinvested back into the portfolio, if not.

6.2. Defined Contribution Sections

It is the Trustee's policy to invest in funds that offer daily dealing, to enable members to readily realise and change their investments. All of the DC Section funds which the Trustee offered during the Plan year are daily priced. The lifecycles did not include any allocation to illiquid assets as at the end of the Plan year.

7. Financially material considerations and non-financial matters

During the Plan year, the Investment Committee received training on climate scenarios and how these are expected to impact the Plan's assets and liabilities.

As part of its advice on the selection and ongoing review of the investment managers, the Plan's investment adviser, LCP, incorporates its assessment of the nature and effectiveness of managers' approaches to financially material considerations (including climate change and other ESG considerations), voting, and engagement.

In March 2026, the Trustee reviewed LCP's assessment of the Plan's investment managers' Responsible Investment ("RI") practices based on LCP's 2025 RI Survey. The survey assessed the Plan's asset managers across five key areas relating to RI: ESG foundations, climate, engagement, systemic stewardship, and voting.

For the DC Sections, the Columbia Threadneedle responsible global equity fund is available for members who wish for investments that take account of ESG considerations more explicitly. In September 2025, the Trustee implemented the Bespoke global equity fund in place of the Blended global equity fund within the lifecycles and the self-select range, which as previously explained incorporates an allocation to a low carbon equity fund.

In general, the Trustee does not consider non-financial matters (i.e. matters relating to the ethical or other views of members and beneficiaries, rather than considerations of financial risk and return) in the selection, retention, and realisation of investments. However, in some cases, it may be appropriate to consider non-financial matters (e.g. making a Shariah-compliant equity index fund available to DC members), but these do not override financial considerations.

8. Voting and engagement

The Trustee has delegated to the investment managers the exercise of rights attaching to investments, including voting rights, and engagement. However, the Trustee takes ownership of the Plan's stewardship by monitoring and engaging with managers as detailed further below.

The investment managers' stewardship policies are:

- BlackRock: Investment Stewardship | BlackRock
- Baillie Gifford: Principles Guidelines Stewardship
- Schroders: How we vote at Schroders| Schroders global
- Newton: Sustainable & Responsible Investing | Newton (newtonim.com)
- MFS: Responsible Investing Policy Statement (mfs.com)
- Columbia Threadneedle: Responsible Investment - Engagement policy and approach.pdf (columbiathreadneedle.com)
- HSBC: Stewardship Policy
- Jupiter: Jupiter Responsible Investment Policy

As part of its advice on the selection and ongoing review of the investment managers, the Plan's investment adviser, LCP, incorporates its assessment of the nature and effectiveness of managers' approaches to voting and engagement.

Following the introduction of DWP's guidance, the Trustee agreed to set stewardship priorities to focus monitoring and engagement with their investment managers on specific ESG factors. The Trustee's stewardship priorities for the Plan are Climate Change and Corporate Transparency. These priorities were selected because managers have well-developed climate change policies and data on corporate transparency, allowing the Trustee to better assess managers' practices and ensure they are aligned with the Trustee's expectations.

The Trustee communicated these priorities to its managers in January 2023, and these did not change throughout the Plan year. The Plan's managers acknowledged the Trustee's priorities and its expectations of the managers and shared relevant information on their approaches to stewardship. As a result, the Trustee has now looked to understand and report on voting decisions made by managers which align with the Trustee's stewardship priorities.

The Trustee evaluated its investment managers' commitment to corporate transparency and climate change by reviewing voting behaviour with a particular focus on the most significant votes. This process has enabled the Trustee to consider the extent to which investment managers' actions are aligned with the Trustee's stewardship priorities.

The Trustee regularly invites the Plan's investment managers to present at Trustee meetings, where the Trustee and its consultants seek to engage and challenge the managers where appropriate. For example, in March 2025, the Investment Committee met with Columbia Threadneedle to discuss the DC Sections' responsible global equity fund, including its responsible investment restrictions, engagement approach and performance.

The Trustee is conscious that responsible investment, including voting and engagement, is rapidly evolving and therefore expects most managers will have areas where they could improve. As such, the Trustee aims to have an ongoing dialogue with managers to clarify expectations and encourage improvements.

9. Investment governance, responsibilities, decision-making and fees (Part 1 of the IPID)

The Trustee has set out in Part 1 of the IPID the division of responsibilities and decision-making in connection with the Plan's investments. The Trustee remains ultimately responsible for the Plan's investments, but it has delegated oversight of the Plan's investment to the Investment Committee.

As mentioned in Section 5 of this Statement, the Trustee assessed the performance of the Plan's investments on an ongoing basis as part of the quarterly monitoring reports it receives.

The performance of the professional advisers is considered on an ongoing basis by the Trustee.

The Trustee has put in place formal objectives for its investment adviser and reviews the adviser's performance against these objectives on an annual basis.

The Trustee carries out an annual evaluation of how its board and committees are run. In 2025, the survey was carried out successfully, and the Trustee believes it is well placed to fulfil its role as Trustee to the Plan.

10. Policy towards risk (Part 2 of the IPID)

Risks are monitored on an ongoing basis with the help of the investment adviser.

The Trustee maintains a risk register, and this is reviewed annually by the Audit and Risk Committee and approved by the Trustee.

The Trustee's policy for some risks, given their nature, is to understand them and to address them should it become necessary, based upon the advice of the Plan's investment adviser or information provided to the Trustee by the Plan's investment managers. These include credit risk, equity risk, currency risk and counterparty risk.

The Plan has buy-ins with two providers, which are collateralised in order to provide extra security. The Trustee has reviewed the collateral adequacy of its buy-in providers on a quarterly basis over the year and was satisfied that there were no issues over the year.

With regard to the risk of having insufficient assets in the Final Pay Sections to cover liabilities, the required return for the Plan to meet expected benefit payments on the Long-Term Funding Target basis was monitored as part of the quarterly monitoring reports, along with the best estimate expected return of the Plan's current investment strategy.

With regard to mismatching risk, the Plan's interest and inflation hedging levels were monitored on an ongoing basis in the quarterly monitoring report and periodically rebalanced.

With regard to the risk of not meeting members' reasonable expectations in terms of pension proceeds on retirement for the DC Sections, the Trustee makes use of equity and equity-based funds, which are expected to provide positive returns above inflation over the long term. These are used in the growth phase of the default option and are also made available within the self-select options. These funds are expected to produce adequate real returns over the longer term.

Together, the investment and non-investment risks set out in Part 2 of the IPID give rise generally to funding risk. The Trustee formally reviewed the Plan's funding position as part of its annual actuarial report to allow for changes in market conditions. On a triennial basis, the Trustee reviews the funding position allowing for membership and other experience. The Trustee reviewed this as part of the last triennial valuation at the 1 January 2024 Valuation. The Trustee also informally monitors the funding position more regularly, on a quarterly basis at Trustee meetings, and the Trustee Directors also have the ability to monitor this daily.

The following risks are covered earlier in this Statement: diversification risk in Sections 3 and 5, investment manager risk and excessive charges in Section 5, illiquidity/marketability risk in Section 6 and ESG risks in Section 7.

11. Investment manager arrangements (Part 3 of the IPID)

There are no specific policies in this section of the Plan's IPID, which sets out details of the Plan's investment managers and their investment guidelines.

12. Description of voting behaviour during the year

All of the Trustee's holdings in listed equities are within pooled funds and the Trustee has delegated to its investment managers the exercise of voting rights. Therefore, the Trustee is not able to direct how votes are exercised, and the Trustee itself has not used proxy voting services over the year. However, the Trustee monitors managers' voting and engagement behaviour on a regular basis and challenges managers where their activity has not been in line with the Trustee's expectations.

In this section we have sought to include voting data on the Plan's funds, in line with the Pensions UK (previously the Pensions and Lifetime Savings Association "Pensions UK") guidance, Pensions UK Vote Reporting template and DWP's guidance. In order to take a pragmatic approach, we have only included funds that hold a significant proportion of their assets in equities and that represent a significant proportion of the overall DC assets. Therefore, we have only included funds used in the DC default strategy given the high proportion of DC assets invested in these funds:

- BlackRock World Equity Index Fund*;

- BlackRock Fundamental Equity Index Fund;
- BlackRock Minimum Volatility Index Fund;
- L&G Low Carbon Transition Global Equity Index Fund;
- BlackRock World Emerging Markets Equity Index Fund;
- Baillie Gifford Defensive Growth Fund* (the Baillie Gifford Multi Asset Growth Fund merged into this fund in June 2025);
- Schroders Sustainable Future Multi-Asset Fund; and
- Newton Real Return Fund.

*These funds were removed from the default strategy during the Plan year; we have included voting data for the funds for prudence.

If Plan members require any further information on voting behaviour for a fund not set out in the Implementation Statement, they can send a message via the 'Contact Us' page of the Plan website (https://www.pearson-pensions.com/contact-us/) and the pensions team will supply any further information, to the extent available.

In addition to the above, the Trustee contacted the Plan's Final Pay Section investment managers that do not hold listed equities, to ask if any of the assets held by the Plan had voting opportunities over the period. The Trustee also contacted the Plan's buy-in providers, to ask if any of the assets held to back members' insured liabilities had any voting rights over the period. These managers and annuity providers all confirmed that none of the assets in question had material voting opportunities over the period that were not simply votes on fund terms.

12.1. Description of the voting processes

For assets with voting rights, the Trustee relies on the voting policies which its managers have in place. The Trustee reviewed these policies, focusing on the elements which relate to its stewardship priorities, and is comfortable that the policies are aligned with the Trustee's views.

BlackRock

BlackRock believes that companies are responsible for ensuring they have appropriate governance structures to serve the interests of shareholders and other key stakeholders. There are certain fundamental rights attached to shareholding. Companies and their boards should be accountable to shareholders and structured with appropriate checks and balances to ensure that they operate in shareholders' best interests to create sustainable value. Shareholders should have the right to vote to elect, remove and nominate directors, approve the appointment of the auditor, and amend the corporate charter or by-laws. BlackRock Investment Stewardship exercises voting rights on behalf of clients in a manner intended to support their long-term financial interests.

The voting and engagement work continuously evolves in response to changing governance-related developments and expectations. Voting guidelines are market-specific to ensure that a company's unique circumstances are taken into account by market, where relevant. Vote decisions are informed by analysis of company disclosures, third-party research, comparisons against industry peers, and engagement with boards and management teams, as necessary. Engagement priorities are global in nature and are informed by BlackRock's observations of governance-related and market developments, as well as through dialogue with multiple stakeholders, including clients. Regional engagement priorities may also be updated based on issues that could impact the long-term sustainable financial performance of companies in those markets. Discussions with clients on engagement and voting topics and priorities are welcomed to gain perspective and better understand which issues are important to them. As outlined in the Global Principles, BlackRock determines which companies to engage directly based on an assessment of the materiality of the issue for sustainable long-term financial returns and the likelihood of engagement being productive.

The vast majority of voting decisions are straightforward applications of BlackRock Investment Stewardship's benchmark policies and are determined by the relevant voting analyst, with consultation with other team members or the regional head as necessary. Whilst BlackRock does subscribe to research from proxy advisory firms, including Institutional Shareholder Services ("ISS") and Glass Lewis, BlackRock Investment Stewardship does not follow their voting recommendations, and this research is only one of a number of inputs into its voting decision process. Other sources of information BlackRock uses include company reporting, engagement with boards and management, public information, third-party research, peer comparisons and ESG research. BlackRock Investment Stewardship analysts may, in the exercise of their professional judgement, conclude that the benchmark policies do not cover the specific matter on which a proxy vote is required or that an exception to the guidelines would be in the long-term financial interests of clients.

BlackRock Investment Stewardship generally supports the recommendations of boards and management but may vote against management proposals or board directors where it considers it in clients' long-term financial interests to signal concern. BlackRock Investment Stewardship does not act collectively with other shareholders or organisations in voting shares and does not disclose its voting intentions in advance of shareholder meetings. In certain markets, voting may be undertaken on a best-efforts basis and BlackRock Investment Stewardship may determine that it is in clients' long-term financial interests not to vote, or not to vote the full allocation, where the costs of voting are expected to outweigh the benefits.

BlackRock Investment Stewardship prioritises its work around themes that encourage sound governance practices and deliver sustainable long-term financial performance. Year-round engagement with clients to understand their priorities and expectations, as well as active participation in market-wide policy debates, help inform these themes. The identified themes shape Global Principles, market-specific Voting Guidelines, and Engagement Priorities, which form the benchmark against which the sustainable long-term financial performance of investee companies is assessed.

Baillie Gifford

Thoughtful voting of Baillie Gifford's clients' holdings is an integral part of its commitment to stewardship. Baillie Gifford believes that voting should be investment led, because how it votes is an important part of the long-term investment process, which is why its strong preference is to be given this responsibility by its clients. The ability to vote clients' shares also strengthens Baillie Gifford's position when engaging with investee companies. Baillie Gifford's ESG team oversees its voting analysis and execution in conjunction with investment managers. Unlike many of its peers, Baillie Gifford does not outsource any part of the responsibility for voting to third-party suppliers. It utilises research from proxy advisers for information only. Baillie Gifford analyses all meetings in-house in line with its ESG Principles and Guidelines and endeavours to vote every one of its clients' holdings in all markets.

Schroders

As active owners, Schroders recognises its responsibility to make considered use of voting rights. The firm therefore votes on all resolutions at all AGMs and EGMs globally unless restricted from doing so, for example, due to share blocking.

Schroders aims to maintain a consistent global approach to voting, subject to regulatory constraints, in alignment with its Proxy Voting Policy.

The overarching principle guiding Schroders' voting activity is to act in the best interests of its clients. Where proposals are inconsistent with the interests of shareholders and clients, the firm will vote against the resolutions. Abstentions may occur in cases where mitigating circumstances apply—such as when a company has taken steps to address shareholder concerns.

Voting resolutions at investee companies are evaluated by Schroders, and, where the firm has authority, it votes in accordance with its fiduciary responsibilities and in what it deems to be its clients' best interests. Corporate Governance specialists assess each proposal, taking into account a range of factors, including company-specific circumstances, long-term performance, governance practices, strategic direction, and adherence to the local corporate governance code. These specialists utilise external research from providers such as Glass Lewis, the Investment Association's Institutional Voting Information Services, and public reports. Proprietary research, conducted by both financial and Sustainable Investment analysts, is also integral to the evaluation process. For contentious issues, Corporate Governance specialists consult with relevant analysts and portfolio managers to gain further insight and understand the broader corporate context.

Schroders also engages 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) serves as Schroders' sole service provider for the processing of all proxy votes across all markets. GL delivers vote processing through its internet-based platform, Viewpoint. Schroders receives GL's voting recommendations in accordance with its bespoke guidelines and also accesses GL's standard research. These insights are further supplemented by analysis from Schroders' in-house ESG specialists and, where relevant, financial analysts and portfolio managers.

To ensure consistency and a formalised voting process, GL automatically votes on all holdings where Schroders owns less than 0.5% of voting rights, excluding merger, acquisition, and shareholder resolutions.

Newton

As an active manager, Newton Investment Management Group (Newton) is committed to ensuring that decisions relating to the exercise of ownership rights are aligned with its investment thesis and its clients' expectations. Newton has established overarching stewardship principles to guide its voting decisions, drawing on internationally recognised governance principles and relevant local governance codes.

The firm believes that the value of its clients' portfolios can be enhanced through strong stewardship, achieved via meaningful engagement with investee companies and the thoughtful exercise of voting rights. These activities are considered an integral and important part of Newton's investment process. For this reason, Newton prefers to retain discretion over the exercise of clients' voting rights and has established comprehensive policies and procedures to guide the global exercise of these rights. Its approach is investment-led and designed to align with the firm's broader investment activities. Newton's long-term investment perspective supports its stewardship goals by seeking to understand and influence the sustainability of individual investments, the broader investment landscape, and, ultimately, the long-term investment objectives of its clients. All voting decisions are taken on a case-by-case basis, reflecting Newton's investment rationale, engagement activity and the company's approach to relevant codes, market practices and regulations, taking into account the company's specific circumstances and any explanations provided by the company. Newton seeks to make proxy voting decisions that are in the best long-term financial interests of its clients and intends to exercise voting rights in all circumstances where it retains voting authority.

Newton identifies clients' requirements and expectations at the outset of each relationship through initial discussions and formal provisions within investment management agreements. Ongoing dialogue—including regular meetings and responses to ad-hoc client requests—provides further insight. Additionally, Newton frequently delivers presentations and training on various aspects of stewardship. These initiatives support clients in articulating and evolving their own stewardship expectations and help ensure that their investment managers are meeting them.

In practice, Newton's understanding of its clients' stewardship priorities enables the firm to communicate these effectively in engagement meetings with companies, clearly articulating the significance of specific issues to ultimate beneficiaries. All voting opportunities are communicated to Newton via an electronic voting platform. Newton's Responsible Investment team reviews all resolutions for matters of concern, and any contentious issues may be referred to the relevant global fundamental equity analyst or portfolio manager for comment. Where an issue remains contentious, Newton may also confer or engage with the company or other relevant stakeholders. An electronic voting service is used to submit voting decisions, with each voting decision submitted by a member of the Responsible Investment team and approved within the system by an alternate member of the team before execution. Newton employs an independent voting service provider to manage upcoming meetings, instruct voting decisions through an electronic platform, and provide voting research. However, the provider's recommendations are not automatically followed. They are only applied where Newton identifies a material conflict of interest.

Newton's external voting provider is subject to oversight by the firm's Vendor Management Oversight Group. As part of this oversight, regular due diligence meetings are conducted and documented, including reviews of the provider's operational performance, service quality, research robustness, and internal controls—particularly those related to managing potential conflicts of interest. Newton also participates in industry consultations, contributing feedback on proxy voting matters to ensure alignment between its expectations and the voting guidance issued by the provider. Where Newton plans to vote against management on an issue, it may seek to engage with the company on a best-efforts basis, depending on the significance of its holding, to share its concerns and allow the company an opportunity to respond. In such cases, Newton communicates its voting intentions ahead of the meeting only to the company and not to third parties. Newton has procedures in place to identify and mitigate potential material conflicts of interest and, where such a conflict is recognised, the voting recommendations of an independent third-party proxy voting service provider will be applied.

L&G

All decisions are made by L&G's Investment Stewardship team and in accordance with its 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 companies. This ensures that L&G's 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.

12.2. Summary of voting behaviour over the year

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

	Fund 1[5]	Fund 2	Fund 3	Fund 4

Manager name	BlackRock	BlackRock	BlackRock	BlackRock
Fund name	World Equity Index Fund	Fundamental Equity Index Fund	Minimum Volatility Index Fund	Emerging Markets Equity Index Fund
Total size of fund at end of reporting period, £m	4,315	863	364	8,324
Value of Plan assets at end of reporting period[1], £m	0	176	176	23
Number of equity holdings at end of reporting period	1,298	3,045	342	1,140
Number of meetings eligible to vote	1,385	3,810	368	2,530
Number of resolutions eligible to vote	20,201	44,656	5,409	22,542
% of resolutions voted	91	94	97	99
Of the resolutions on which voted, % voted with management[2]	96	95	97	85
Of the resolutions on which voted, % voted against management[2]	3	4	2	14
Of the resolutions on which voted, % abstained from voting[2]	0	1	0	3
Of the meetings in which the manager voted, % with at least one vote against management	20	24	17	42
Of the resolutions on which the manager voted, % voted contrary to recommendation of proxy adviser	0[3]	0[3]	0[3]	0[3]

	Fund 5[5]	Fund 6	Fund 7	Fund 8
Manager name	Baillie Gifford	Schroder Life	Newton	L&G
Fund name	Defensive Growth Fund	Sustainable Future Multi-Asset Fund	Real Return Fund	Low Carbon Transition Global Equity Index Fund
Total size of fund at end of reporting period, £m	272	943	1,966	7,532
Value of Plan assets at end of reporting period[1], £m	0	40	40	193
Number of equity holdings at end of reporting period	131	820	65	2772
Number of meetings eligible to vote	66	910	67	4,827
Number of resolutions eligible to vote	847	11,518	994	49,232
% of resolutions voted	98	97	99	100

Of the resolutions on which voted, % voted with management[2]	96	89	92	78
Of the resolutions on which voted, % voted against management[2]	3	11	8	21
Of the resolutions on which voted, % abstained from voting[2]	1	0	0	1
Of the meetings in which the manager voted, % with at least one vote against management	20	58	42	63
Of the resolutions on which the manager voted, % voted contrary to recommendation of proxy adviser	N/A[4]	9	7	10

[1] Asset values include the Plan's DC and AVC assets.

[2] Figures may not total 100% due to a variety of reasons, such as lack of management recommendation, scenarios where an agenda has been split voted, multiple ballots for the same meeting were voted differing ways, or a vote of 'Abstain' is also considered a vote against management.

[3] BlackRock does not follow any single proxy research firm's voting recommendations, though it subscribes to two research firms. BlackRock's voting and engagement analysis is determined by several key inputs including a company's own disclosures, and BlackRock's record of past engagements.

[4] Whilst Baillie Gifford is cognisant of proxy advisers' voting recommendations (ISS and Glass Lewis), it does not delegate or outsource any of its stewardship activities or follow or rely upon their recommendations when deciding how to vote on Baillie Gifford's clients' shares. All client voting decisions are made in-house. Baillie Gifford votes in line with its in-house policy and not with the proxy voting providers' policies.

[5]All assets have been disinvested from these funds by year-end following the strategy changes.

12.3. Most significant votes over the year

Given the large number of votes which are cast by managers during every Annual General Meeting season, the timescales over which voting takes place as well as the resource requirements necessary to allow this, the Trustee did not identify significant voting ahead of the reporting period. Instead, the Trustee has, with support from its advisers, retrospectively created a shortlist of most significant votes by requesting each manager provide a shortlist of votes, which comprises a minimum of ten most significant votes, and suggested the managers could use the PENSIONS UK's criteria for creating this shortlist. The Trustee will consider the practicalities of informing managers ahead of the vote and will report on it in next year's Implementation Statement.

By informing its managers of its stewardship priorities and through its regular interactions with the managers, the Trustee believes that its managers will understand how it expects them to vote on issues for the companies they invest in on its behalf.

Commentary on the most significant votes over the period, from the Plan's asset managers who hold listed equities, is set out below. We have interpreted "most significant votes" to mean those that:

- align with the Trustee's stewardship priorities;
- might have a material impact on future company performance;
- the investment manager believes to represent a significant escalation in engagement;
- impact a material fund holding, although this would not be considered the only determinant of significance, rather it is an additional factor;
- have a high media profile or are seen as being controversial;
- are shareholder resolutions which received material support; or
- the Plan or the sponsoring company has a particular interest in.

The Trustee has reported on one of these significant votes per fund only as the most significant votes. If members wish to obtain more information on significant votes, this is available upon request.

BlackRock World Equity Index Fund

- **Company and date of resolution: Shell Plc, May 2025**
- **Size of mandate's holding**: BlackRock did not provide this at the time of issue.
- **Summary of resolution**: Request that the company disclose whether, and how, its liquefied natural gas demand forecasts, production and sales targets, and planned capital expenditure in natural gas assets are aligned with its climate commitments, including its target to reach net zero emissions by 2050.
- **Management recommendation**: Against. **Fund manager vote:** Against. **Vote outcome**: Fail.
- **The reason the Trustee considers this vote to be most significant:** The vote relates to one of the Trustee's stewardship priorities
- **Relevant stewardship priority:** Climate change
- **Rationale for the voting decision:** Shell already provides sufficient disclosure and/or reporting regarding this issue, or is already enhancing its relevant disclosure. There is no demonstrable economic benefit to shareholders.
- **Next steps**: BlackRock may follow up through engagement where it has voted to signal concerns and where companies seek further clarification after the meeting.

BlackRock Minimum Volatility Index Fund

- **Company and date of resolution: Amazon.com, Inc. May 2025**
- **Size of mandate's holding:** BlackRock did not provide this at the time of issue.
- **Summary of resolution**: Report on impact of data centres on climate commitments.
- **Management recommendation**: Against. **Fund manager vote**: Against. **Vote outcome**: Fail.
- **The reason the Trustee considers this vote to be most significant:** The vote relates to one of the Trustee's stewardship priorities.
- **Relevant stewardship priority:** Climate change
- **Rationale for the voting decision:** The company already provides sufficient disclosure and/or reporting regarding this issue, or is already enhancing its relevant disclosures.
- **Next steps**: Where BlackRock votes to signal concerns, it may engage with the company after the meeting to clarify its views and better understand the company's practices and priorities.

BlackRock Fundamental Equity Index Fund

- **Company and date of resolution: Alphabet Inc., June 2025**
- **Size of mandate's holding**: BlackRock did not provide this at the time of issue.
- **Summary of resolution**: Publish a human rights impact assessment of AI driven targeted advertising.
  Management recommendation: Against. **Fund manager vote**: Against. **Vote outcome**: Fail.
- **The reason the Trustee considers this vote to be most significant:** The vote relates to one of the Trustee's stewardship priorities.
- **Relevant stewardship priority:** Corporate transparency
- **Rationale for the voting decision:** The company already provides sufficient disclosure and/or reporting regarding this issue or is already enhancing its relevant disclosures.
- **Next steps**: Where BlackRock votes to signal concerns, it may engage with the company after the meeting to provide clarity and inform its understanding of the company's practices and priorities.

L&G Low Carbon Transition Global Equity Index Fund

- **Company and date of resolution: Broadcom Inc., April 2025**
- **Size of mandate's holding**: 1.1%
- **Summary of resolution**: Elect Director Henry Samueli.
  Management recommendation: For. **Fund manager vote**: Against. **Vote outcome**: Pass.
- **The reason the Trustee considers this vote to be most significant:** The vote relates to one of the Trustee's stewardship priorities.
- **Relevant stewardship priority:** Climate change
- **Was vote decision communicated ahead of vote:** L&G's Asset Management business publicly communicates its vote instructions on its website with the rationale for all votes against management. It is L&G's policy not to engage with its investee companies in the three weeks prior to an AGM as its engagement is not limited to shareholder meeting topics.

- **Rationale for the voting decision:** Climate Impact Pledge: A vote against is applied as the company is deemed not to have made sufficient progress against its climate expectations and red lines, as set out in its sector guides through L&G's dial-mover engagement programme.
- **Next steps**: L&G will continue to engage with the company, advocate its position publicly and monitor progress at both company and market level.

BlackRock World Emerging Markets Equity Index Fund

- **Company and date of resolution: Shaanxi Coal Industry Co., Ltd., March 2025**
- **Size of mandate's holding:** BlackRock did not provide this at the time of issue.
- **Summary of resolution**: Elect Dan Yong as Director.
  Management recommendation: For. **Fund manager vote**: Against. **Vote outcome**: Pass.
- **The reason the Trustee considers this vote to be most significant:** The vote relates to the Trustee's stewardship priorities.
- **Relevant stewardship priority:** Corporate transparency and climate change
- **Was vote decision communicated ahead of vote:** BlackRock endeavours to communicate to companies when it intends to vote against management, either before or just after casting votes in advance of the shareholder meeting.
- **Rationale for the voting decision:** The Company does not meet BlackRock's aspirations of having adequate climate risk disclosures against all 4 pillars of TCFD.
- **Next steps**: Where BlackRock votes to signal concerns, it may engage with the company after the meeting to provide clarity and support its understanding of the company's practices and priorities.

Baillie Gifford Defensive Growth Fund

- **Company and date of resolution: Equinix, INC. May 2025**
- **Size of mandate's holding:** 0.6%
- **Summary of resolution**: Shareholder resolution – governance.
- **Management recommendation**: Against. **Fund manager vote**: Against. **Vote outcome**: Fail.
- **The reason the Trustee considers this vote to be most significant:** The vote relates to one of the Trustee's stewardship priorities.
- **Relevant stewardship priority:** Corporate transparency
- **Rationale for the voting decision:** Baillie Gifford opposed the shareholder resolution requesting a reduction in the ownership threshold for shareholders to request action by written consent, as it is comfortable with the current governance provisions at the company.
- **Next steps**: Baillie Gifford will continue to monitor governance arrangements at the company and will evaluate the merit of future shareholder proposals on a case-by-case basis.

Schroder Life Sustainable Future Multi-Asset Fund

- **Company and date of resolution: Visa Inc, January 2025**
- **Size of mandate's holding:** 0.2%
- **Summary of resolution**: Advisory Vote on Executive Compensation.
  Management recommendation: For. **Fund manager vote:** Against. **Vote outcome**: Pass.
- **The reason the Trustee considers this vote to be most significant:** This vote relates to one of the Trustee's stewardship priorities.
- **Relevant stewardship priority:** Corporate transparency.
- **Was vote decision communicated ahead of vote:** Schroders may tell the company of its intention to vote against the recommendations of the board before voting, in particular if they are large shareholders or if Schroders has an active engagement on the issue.
- **Rationale for the voting decision:** The threshold target of the relative total shareholder return metric is set below median performance. Additionally, Schroders expects far more disclosure around the bonus scorecard which appears to allow for a significant element of committee discretion.
- **Next steps:** Schroders will continue to monitor Visa's remuneration disclosures, particularly around the bonus scorecard and the use of committee discretion, and may use future voting and engagement to encourage improved transparency.

Newton Real Return Fund

- **Company and date of resolution: The Goldman Sachs Group, Inc., April 2025**
- **Size of mandate's holding:** 1.0%
- **Summary of resolution**: Report on Clean Energy Supply Financing Ratio.
- **Management recommendation**: Against. **Fund manager vote:** For. **Vote outcome**: Fail.
- **The reason the Trustee considers this vote to be most significant:** This vote relates to one of the Trustee's stewardship priorities.
- **Relevant Stewardship Priority:** Corporate transparency
- **Was vote decision communicated ahead of vote:** No
- **Rationale for the voting decision:** Newton supported the shareholder proposal requesting the company to report on clean energy supply financing ratio as in Newton's view, the ask is aligned to the sustainable financing activities of the company and should provide shareholders increased transparency in assessing the company's progress on the company's management of climate risks and opportunities.
- **Next steps:** Newton will continue to support improved disclosure on clean energy financing and portfolio decarbonisation to help investors assess the bank's progress against its sustainable finance targets.