

# **AB InBev Pension Plan (the “Plan”) – DC Section**

## **Annual Statement of Investment Principles Implementation Statement – 31 December 2021**

### **Introduction**

This Statement, written for the benefit of the members of the AB InBev Pension Plan (the “Plan”), sets out how, and the extent to which, the Statements of Investment Principles (“SIPs”) produced by the Trustee have been followed over the 12 months to 31 December 2021.

The SIPs are documents drafted by the Trustee in order to help govern the Plan’s investment strategy. It details a range of investment-related policies, a summary of which, for the DC Sections, is included in the table below, alongside the relevant actions taken by the Trustee in connection with each of these policies.

As required by the legislation, the Trustee has consulted a suitably qualified person and has obtained written advice from its investment consultant, Mercer Limited (“Mercer”). The Trustee believes the investment consultant meets the requirement of Section 35 (5) of the Pensions Act 1995. The Trustee in preparing this Statement has also consulted the sponsoring Company.

In September 2021, the Trustee welcomed members into the Plan from the pension arrangement of SAB, a company AB InBev acquired in 2016. As part of the Former SAB members joining the Plan, the Trustee chose, at that time, not to change where those members are invested or who administered those benefits. As a result there are now two distinct sections of the Plan, the Former SAB section and the AB InBev Section. This Statement will cover both sections.

This Statement is based on, and should be read in conjunction with, the relevant version of the SIPs that were in place for the Plan Year, which was the SIP dated August 2020 for the Former SAB Section and the SIP dated August 2020 for the AB InBev Section.

The first two Sections of this Statement sets out the investment objectives of the Plan and changes which have been made to the SIPs during the Plan Year, respectively.

The third Section of this Statement sets out how, and the extent to which, the policies in the DC Sections of the SIPs have been followed. The Trustee can confirm that all policies in the SIPs have been followed during the Plan Year.

A copy of the AB InBev SIP is available at <https://retirement.fidelity.co.uk/costs-and-charges/abin> . As SAB Miller UK Staff Pension Scheme ceased to exist following the merge on September 2021, there’s no publicly available version of the latest SIP for this scheme.

Sections 3 and 4 include information on the engagement and key voting activities of the underlying investment managers within each Section of the Plan.

### **Statement of Investment Principles**

#### **Investment Objectives of the Plan**

The Trustee believes it is important to consider the policies in place in the context of the objectives they have set. The investment objectives for the DC Section as set out in the March 2022 SIP are as follows:

- To offer members a pre-defined lifestyle switching strategy as the default option and ensuring that the investment strategy allows members to plan for retirement;
- To make some funds available which provide an opportunity for good long term rates of return;
- To make other pre-defined lifestyle switching strategies available which seek to offer protection for members’ accumulated assets against sudden (and sustained) reductions in capital values or in the amount of pension that can be purchased;
- To consider the cost and complexity of the Plan’s investment range in terms of administration and communication; and;
- To offer members the choice to tailor the investments to their own personal and financial circumstances.

## **AB InBev UK Limited Pension Plan (the “Plan”) – DC Section**

### **Review of the SIPs**

During the year to 31 December 2021, no changes were made to the Plan’s SIPs - as such the SIPs in place through 2021 was signed in August 2020 for the Former SAB Section and in August 2020 for the AB InBev Section.

In 2022, following the consolidation of the Former SAB section and the AB InBev Section, the AB InBev SIP was reviewed and signed in March 2022. This new SIP covers both the Former SAB section and the AB InBev Section. As this SIP was not finalised within the Plan year the SIP versions this report relates to are the August 2020 versions for both the Former SAB Section and AB InBev Section.

### **Assessment of how the policies in the SIPs have been followed for the year to 31 December 2021**

The information provided in this section highlights the work undertaken by the Trustee during the year, and longer term where relevant, and sets out how this work followed the Trustee’s policies in the SIPs relating to the DC Sections of the Plan.

**In summary, it is the Trustee’s view that the policies in the SIPs have been followed during the Plan Year.**



### Strategic Asset Allocation

#### **Kinds of investments to be held, the balance between different kinds of investments and expected return on investments**

##### **Policy**

**Both Sections:** The Trustee has made available a default option. The default option places the emphasis on aiming to deliver a good level of real return over members’ working lifetimes (whilst mitigating risk through diversification) and also encompasses a switch into asset classes designed to reduce the volatility of members’ account values, in the years approaching their selected target retirement age. The Trustee believes that members should make their own investment decisions based on their individual circumstances. The Trustee regards their duty as making available a range of suitable pooled investment vehicles sufficient to enable members, where they choose to, to tailor the investment strategy to their own needs.

##### **How has this policy been met over the Plan Year (for the Former SAB section)?**

**AB InBev Section:** the investment strategy was reviewed in detail over 2020; the Trustee had discussions with their investment consultant to discuss and change the default strategy, as well as the other investment options available to members within the Plan. The investment strategy review covered:

- Whether the ‘growth phase’ remained appropriate.
- A review of the retirement destination of the default arrangement (i.e. should it target cash, drawdown, or annuity purchase) and if it remains appropriate, based on the current and future needs of the membership, expected retirement pot sizes and current industry trends.
- The at-retirement allocation of the investments, and whether they remain appropriate with the above bullet point in mind.

As a result of the review, the Trustee decided to make a number of changes to the Plan’s investment strategy, considering appropriate investment advice. These included introducing new self-select funds and changing the investment strategy and at-retirement allocation for the default investment strategy, from the Working Life Strategy Cash Ready to the Working Life Strategy Drawdown Ready. These changes were communicated to members in November 2020.

**Both Sections:** in September 2021, the Plan received the members of the SAB UK Staff Pension Scheme, as a result there are now two distinct sections of the Plan, the Former SAB section and the AB InBev Section.

Over the year, the Trustee received investment performance reports on a quarterly basis for all of the funds within the fund range. This included fund performance against benchmarks over both short and longer-term periods. Investment performance is reviewed by the Trustee at the quarterly Investment Committee meetings. The Trustee was satisfied with the performance of the funds over the Plan Year having performed in line with their underlying aims and objectives.

The Trustee will formally review the default investment option within each section at least every three years or immediately following any significant change in the investment policy or the Plan’s member profile.

## AB InBev UK Limited Pension Plan (the “Plan”) – DC Section

### Expected return on investments

**Both Sections:** In designing the default option, the Trustee has explicitly considered the trade-off between risk and expected returns. Risk is not considered in isolation, but in conjunction with expected investment returns and outcomes for members. The asset allocation is consistent with the expected amount of risk that is appropriate given the age of a member and when they expect to retire.

#### How has this policy been met over the Plan Year (for both sections)?

**Both Sections:** Monitoring reports from the Plan’s providers (Aegon for the Former SAB Section and Fidelity for the AB InBev Section) is reviewed by the Trustee on a quarterly basis. These reports include the performance of the funds that make up the default investment option within each section and the self-select range. The monitoring reports include how each fund has performed against its specific benchmark and target(s).

### Risks, including the ways in which risks are to be measured and managed

#### Policy

**Both Sections:** In deciding on the options to be made available to members, the Trustee has considered risk from a number of perspectives. The Trustee considered both quantitative and qualitative measures as well as how best to manage the various risks facing members. In addition to members being given an assessment of the risk attached to each fund through communication material provided by the investment provider, the Trustee also encourages members to take independent financial advice.

#### How has this policy been met over the Plan Year?

**Both Sections:** The Trustee continues to provide a range of investments which enable members to reflect in their selection of funds the level or risk they wish to take in light of their own individual circumstances. In member facing communications, the Trustee highlights a number of risks that a member may face as a result of investing in any particular funds.

The risks below are not exhaustive, but cover the main risks considered by the Trustee to be financially material. A table is provided on Section 2.3 (for the Former SAB Section) and Section 3 (for the AB InBev Section) of the SIPs outlining the risks, how they are managed and how they are measured.

- Inflation Risk
- Currency Risk
- Credit Risk
- Equity Property
- Inadequate Diversification
- Environmental, Social and Corporate Governance Risk
- Investment Manager Risk
- Liquidity Risk
- Pension Conversion Risk
- Underperformance of Expectations Risk

The Trustee is aware that members have differing time horizons within the Plan and as such, offers three lifestyle strategies that helps to manage a number of risks for members as they approach retirement.

The vast majority of the rated funds, for both sections, are highly rated by the Plan’s investment consultants during the year, the exception being the Abridn Global Absolute Return Strategies (GARS) Fund and the BlackRock Emerging Markets which are both rated B, and used in the SAB Section.

Overall the Trustee is comfortable with the ratings applied by its investment Consultant and continues to closely monitor the ratings and any significant developments at each of the underlying investment managers of both sections.



### Investment Mandates

## Securing compliance with the legal requirements about choosing investments

### Policy

**Both Sections:** In adherence to Section 36 of the Pensions Act 1995, the Trustee will always take proper written advice from an authorised investment consultant before selecting any fund, changing strategy, or changing providers.

As required under the Act, in preparing the Statement the Trustee has consulted a suitably qualified adviser in obtaining written advice from Mercer. The Trustee, in preparing this Statement, has also consulted AB InBev UK Ltd / ABI SAB Group Holding Limited (the “Company”) as sponsors of the Plan. The advice received and arrangements implemented are in the Trustee’s opinion, consistent with the requirements of Section 26 of the Pensions Act 1995 (as amended).

### How has this policy been met over the Plan Year?

**Both Sections:** Over the Plan year to 31 December 2021, the Trustee welcomed members into the Plan from the pension arrangement of SAB. As part of the Former SAB members joining the Plan, the Trustee chose, at that time, not to change where those members are invested or who administrated those benefits.

## Realisation of Investments

### Policy

**Both Sections:** The selection, retention and realisation of assets within the pooled funds are delegated to the respective underlying fund managers in line with the mandates of the funds. Likewise, the underlying fund managers have full discretion (within the constraints of their mandates) on the extent to which social, environmental or ethical considerations are taken into account in the selection, retention and realisation of investments.

### How has this policy been met over the Plan Year?

**Both Sections:** The Trustee receives quarterly administration reports produced by the two administrators, which are reviewed by the Trustee through their administration sub-committee. This enables the Trustee to monitor that the requirements for the processing of financial transactions are being met.

The service level standards are reviewed periodically to ensure they remain appropriate and meet legislative requirements. Over the Plan year, Fidelity processed 99.7% of cases within the targets agreed with the Trustee averaged over four quarterly reports, Aegon achieved 87.7%. The Trustee periodically reviews the service levels to ensure that they remain appropriate and meet legislative requirements.

As confirmed in the Chair’s Statement, overall, the Trustee is satisfied that the Plan’s core financial transactions have been processed promptly and accurately during the period to which this Statement relates.

All funds utilised by the DC Section are daily dealt pooled investment vehicles, which hold highly liquid assets, are accessed by an insurance contract and should be realisable based on member demand.



### Monitoring the Investment Managers

#### Incentivising asset managers to align their investment strategies and decisions with the Trustee’s policies

##### Policy

The investment managers are appointed based on their capabilities and, therefore, their perceived likelihood of achieving the expected return and risk characteristics required for the asset class being selected. The investment managers are aware that their continued appointment is based on their success in delivering the mandate for which they have been appointed to manage. If the Trustee is dissatisfied, then they will look to replace the manager but, **for the AB InBev Section**, the Trustee may ask the manager to review their fees instead of terminating the mandate.

##### How has this policy been met over the Plan Year?

**Both Sections:** In the year to 31 December 2021, the Trustee remained happy that the contractual arrangements in place continue to incentivise the managers to make decisions based on medium to long-term financial and non-financial performance.

#### Evaluation of asset managers' performance and remuneration for asset management services

##### Policy

**Both Sections:** The Trustee recognises they have a long-term time horizon as set out in SIPs. As such, managers are assumed to be held for a suitably long time. Managers’ performance net of fees is therefore reviewed over both short and long time horizons.

##### How has this policy been met over the Plan Year?

**Both Sections:** The Trustee reviewed the investment performance at the quarterly meetings. Whilst the Trustee’s focus has been on long-term performance, they also take shorter-term performance into account. There were no performance concerns raised in 2021.

The Trustee receives reports from their platform providers on a quarterly basis, which present performance information over three months, one year, three years and five years. The Trustee reviews the absolute performance and relative performance against a suitable index or comparator used as the benchmark, and against the underlying manager’s stated target performance (over the relevant time period) on a net of fees basis.

If an underlying manager is not meeting performance objectives, or their investment objectives for the fund have changed, the Trustee may review the suitability of the manager, and change managers where required.

As part of their annual Value for Money (“VfM”) assessment, the Trustee reviews the investment manager fees.

#### Incentivising the asset manager to make decisions based on assessments about medium to long-term financial and non-financial performance of an issuer of debt or equity

##### Policy

**Both Sections:** The Trustee’s policy is that day-to-day decisions relating to the selection, retention and realisation of the Plan’s investments are left to the discretion of the investment managers. This includes consideration of all financially material factors, including ESG-related issues where relevant.

## AB InBev UK Limited Pension Plan (the “Plan”) – DC Section

**SAB Section:** The Trustee arranges to meet the platform provider at least once a year to review their actions together with the reasons for, and background behind, their investment performance or, if necessary, the external, ‘guest’, managers on their platform. The Trustee’s investment adviser is also available to provide help in monitoring the Investment Managers in the form of written reports.

### How has this policy been met over the Plan Year?

**Both Sections:** The Trustee receives investment manager performance reports on a quarterly basis, which both present performance information over three months, one year, three years and five years. The Trustee reviews the absolute and relative performance against a suitable index used as the benchmark, and against the underlying manager’s stated target performance (over the relevant time period) - all on a net of fees basis. Whilst the Trustee’s focus is on long-term performance, it also takes shorter-term performance into account. Additionally, the Trustee reviews the net performance returns for all funds members are invested in as part of preparing the annual Chair’s Statement.

If an underlying manager is not meeting performance objectives, or their investment objectives for the fund have changed, the Trustee may review the suitability of the manager, and change managers where required. All managers except LGIM (Diversified Fund) and Aegon (Property Fund) met their objectives during the Plan Year.

**SAB Section:** The Trustee considers the Investment Consultant’s assessment of how each underlying investment manager embeds ESG into its investment process and how the manager’s responsible investment philosophy aligns with the Trustee’s responsible investment policy. This includes the underlying investment managers’ policy on voting and engagement. The Trustee will use this assessment in decisions around selection, retention and realisation of manager appointments.

Investment managers are aware that their continued appointment relies on their success in delivering the mandate for which the Trustee has appointed them.

## Monitoring portfolio turnover costs

### Policy

**Both Sections:** The Trustee reviews the DC Section’s portfolio turnover costs as part of the annual value for money assessment.

### How has this policy been met over the Plan Year?

**Both Sections:** Over the year, the Trustee considered the DC Section’s portfolio turnover costs as part of the annual Value for Members assessment. While the transaction costs provided appear to be reflective of costs expected of the various assets classes and markets that the Plan invests in, there is not as yet any “industry standard” or universe to compare these to. It is worth noting that transaction costs can be negative, thus contributing positively to performance.

## The duration of the arrangements with asset managers

### Policy

**Both Sections:** All the funds are open-ended with no set end date for the arrangement. The DC Section’s Fund Range and default investment option are reviewed on at least a triennial basis. An underlying manager’s appointment will be considered and may be terminated if it is no longer considered optimal, nor have a place in the default strategy or the self-select fund range.

### How has this policy been met over the Plan Year?

Over the year, the Trustee received investment performance reports on a quarterly basis for all of the funds within the fund range. There were no concerns over 2021.

There were no changes to manager appointments over the year to 31 December 2021.



### ESG Stewardship and Climate Change

#### Financial and non-financial considerations and how those considerations are taken into account in the selection, retention and realisation of investments

##### Policy

**Both Sections:** The Trustee’s policy is that day-to-day decisions relating to the selection, retention and realisation of the Plan’s investments are left to the discretion of the investment managers. This includes consideration of all financially material factors, including ESG-related issues where relevant.

The Trustee believes that environmental, social and corporate governance (“ESG”) factors may have a material impact on the performance of the Plan’s assets.

**SAB Section:** The Trustee believes that good stewardship can create and preserve value for companies and markets as a whole.

The Trustee expect the underlying Investment Managers to evaluate ESG issues, including climate change considerations and exercise voting rights and in stewardship obligations in accordance with their own corporate governance policies and current best practice, including the UK Corporate Governance Code and UK Stewardship Code.

##### How has this policy been met over the Plan Year?

With regards to selection and retention, the Trustee received advice from its investment consultant in relation to several new funds (and the funds to be replaced). In each case, the Trustee received an assessment from its investment consultant in the form of two ratings. These ratings relate to overall belief in the investment fund to achieve its objectives going forward and assessment of the ESG credentials exhibited by both the fund and the fund manager. The investment performance report includes how investment managers are delivering against their specific mandates.

The Trustee may incorporate the views of members with respect to the fund range offered. Member views have not explicitly been taken into account in the selection, retention and realisation of investments, although feedback received from members is welcomed and considered by the Trustee.

The Plan’s SIPs include the Trustee’s policy on Environmental, Social and Governance (‘ESG’) factors, stewardship and Climate Change. This policy sets out the Trustee’s beliefs on ESG and climate change and the processes followed by the Trustee in relation to voting rights and stewardship. In order to establish these beliefs and produce this policy, the Trustee undertook investment training with support from their professional advisor. The Trustee keeps their policies under regular review, with the SIPs subject to review at least triennially.

Where managers may not be highly rated from an ESG perspective, the Trustee continues to monitor. When implementing a new manager they would consider the ESG rating of the fund.

The Trustee acknowledges that fixed income funds often do not have a high ESG rating assigned by the investment adviser, due to the nature of the asset class where it is harder to engage with the issuer of debt.



### Voting and Engagement Disclosures



**The exercise of the rights (including voting rights) attaching to the investments and undertaking engagement activities in respect of the investments (including the methods by which, and the circumstances under which, the Trustee would monitor and engage with relevant persons about relevant matters).**

#### Policy

When considering the appointment of new managers, and reviewing existing managers, the Trustee, together with its investment consultant, looks to take account of the approach taken by managers with respect to sustainable investing including voting policies and engagement where relevant. The Trustee’s policy is to delegate responsibility for the exercising of ownership rights (including voting rights) attaching to investments to the investment managers. However, for the **AB InBev Section**, we may, where possible, instruct our passive manager to vote as the Trustee may wish on any particular issue. The Trustee recognises the UK Stewardship Code as best practice and encourages its investment managers to comply with the UK Stewardship Code or explain where they do not adhere to this policy.

#### How has this policy been met over the Plan Year?

The Trustee does not own securities directly and have therefore, in effect, delegated voting to the investment managers, through investment in pooled funds. As such, this activity is expected to be undertaken on behalf of the Trustee. The Trustee does not use the direct services of a proxy voter; however, the investment managers may enlist the service of a proxy voter when required. In future years, investment managers will be expected to provide voting summary reports on a regular basis, at least annually. Going forwards, these reports will be reviewed by the Trustee to ensure that they align with the Trustee’s policies.

The Trustee considers the investment adviser’s assessment of how each underlying investment manager embeds ESG into its investment process and how the manager’s responsible investment philosophy aligns with the Trustee’s own responsible investment policy. This includes the underlying investment managers’ policy on voting and engagement. The Trustee will use this assessment in decisions around selection, retention and realisation of manager appointments. Voting activity for the investment managers is summarised on the next section.

#### Former SAB section (funds with an equity component)

- Designated Global Growth Multi Asset \*\*
- BlackRock DC 30/70 Hedged Global Equity
- BlackRock Market Advantage
- LGIM Diversified Fund
- BlackRock DC 50/50 Global Growth
- BlackRock DC Aquila US Equity Index
- BlackRock DC UK Growth
- BlackRock Alpha Small Companies
- BlackRock Pacific Rim Equity Index
- BlackRock European Equity Index
- BlackRock UK Equity Index Tracker
- BlackRock World (ex-UK) Equity Index
- BlackRock Emerging Markets
- Standard Life GARS
- BlackRock Emerging Markets Equity Index
- BlackRock Diversified Growth
- BlackRock UK Special Situations
- Aegon AM Ethical Equity
- HSBC Islamic Global Equity Index
- BlackRock Japanese Equity Index

#### AB InBev section (funds with an equity component)

The following funds contain an allocation to equities:

- AB InBev South East Asia Pensions Fund
- BlackRock Emerging Markets Fund
- LGIM Future World Fund

\*Funds are part of the default option of the AB InBev section.

\*\* Funds are part of the default option of the Former SAB section.

Voting and engagement activity was requested from all providers but has not been received at the completion date of this statement for all funds described above.

## AB InBev UK Limited Pension Plan (the “Plan”) – DC Section

### Examples of Engagement Activity by the Plan’s Equity Investment Managers

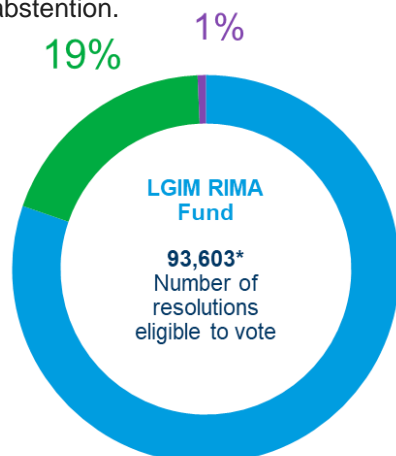
The following are examples of engagement activity undertaken by some of the Plan’s Equity investment managers.

Fund	Number of engagements undertaken at a firm level in the year	Split between E, S and G of engagements	% of engagements pertaining to climate issues	% of engagements pertaining to Board Diversity
<b>LGIM RIMA</b>	545 company engagements	E = 10%; S = 8%; G = 14%	Climate Change: 29%	Board Composition: 15%
<b>BlackRock DC 30/70 Hedged Global Equity</b>	2,521 company engagements	E = 70%; S = 35%; G = 85%	Climate Risk Mgmt: 50% / Environmental Impact Mgmt: 22%	Board Composition & Effectiveness: 44%
<b>LGIM Diversified Fund</b>	506 company engagements	E = 11%; S = 9%; G = 15%	Climate Change: 31%	Company Disclosure & Transparency: 22%
<b>LGIM North America Equity Index</b>	124 company engagements	E = 12%; S = 25%; G = 27%	Climate Change: 40% / Climate Impact Pledge: 34%	Board Composition: 20%
<b>BlackRock European Equity Index Fund</b>	462 company engagements	E = 71%; S = 18%; G = 77%	Climate Risk Mgmt: 38% / Environmental Impact Mgmt: 5%	Board Composition & Effectiveness: 47%
<b>BlackRock Japanese Equity Index</b>	363 company engagements	E = 58%; S = 28%; G = 93%	Climate Risk Mgmt: 52% / Environmental Impact Mgmt: 7%	Board Composition & Effectiveness: 38%
<b>BlackRock UK Equity Index Fund</b>	3,088 company engagements	E = 68%; S = 35%; G = 86%	Climate Risk Mgmt: 49% / Environmental Impact Mgmt: 21%	Board Composition & Effectiveness: 46%
<b>LGIM Future World</b>	276 company engagements	E = 9%; S = 20%; G = 22%	Climate Change: 37%	Board Composition: 25%
<b>BlackRock World (ex-UK) Equity Index</b>	1,607 company engagements	E = 71%; S = 37%; G = 84%	Climate Risk Mgmt: 51% / Environmental Impact Mgmt: 20%	Board Composition & Effectiveness: 44%
<b>BlackRock Emerging Markets Equity Index</b>	455 company engagements	E = 80%; S = 43%; G = 93%	Climate Risk Mgmt: 64% / Environmental Impact Mgmt: 37%	Board Composition & Effectiveness: 52%
<b>BlackRock DC Aquila US Equity Index</b>	583 company engagements	E = 78%; S = 47%; G = 80%	Climate Risk Mgmt: 57% / Environmental Impact Mgmt: 33%	Board Composition & Effectiveness: 39%
<b>BlackRock Pacific Rim Equity Index</b>	208 company engagements	E = 74%; S = 70%; G = 95%	Climate Risk Mgmt: 58% / Environmental Impact Mgmt: 42%	Board Composition & Effectiveness: 65%

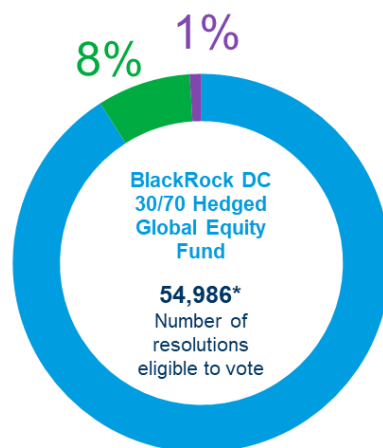
## AB InBev UK Limited Pension Plan (the 'Plan') – DC Section

### Voting Activity during the Plan year

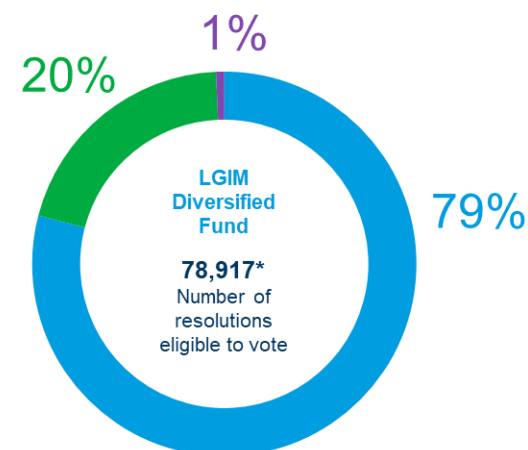
Set out below is a summary of voting activity for this reporting period relating to the relevant strategies in the DC Sections of the Plan. Voting activity has been requested from all managers but at the time of writing this report, not all managers have responded. We will continue to chase the managers to receive this information. **Votes “for / against management”** assess how active managers are in voting for and against management. **Purple** represents abstention.



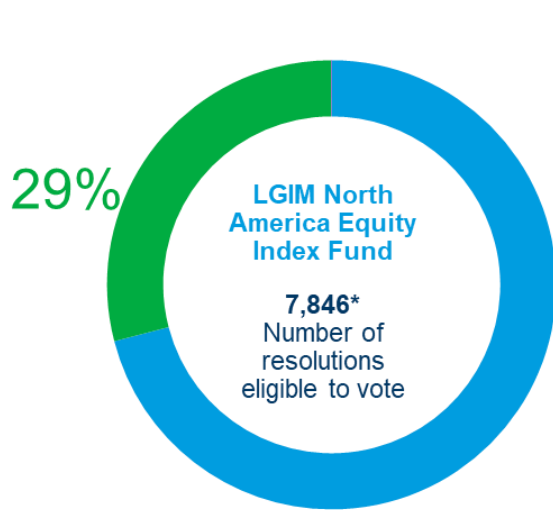
\*99.8% of resolutions voted on



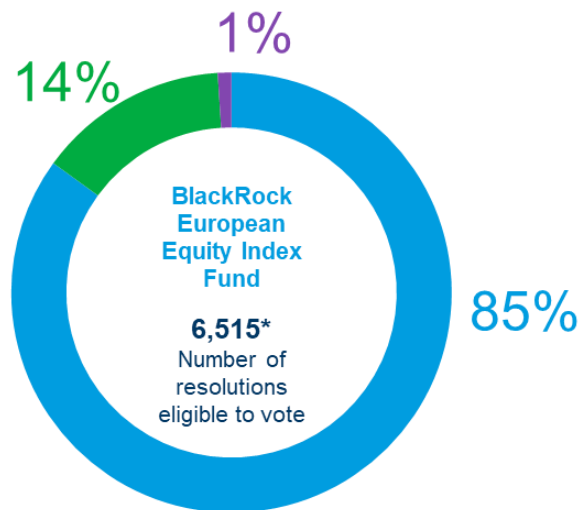
\*99% of resolutions voted on



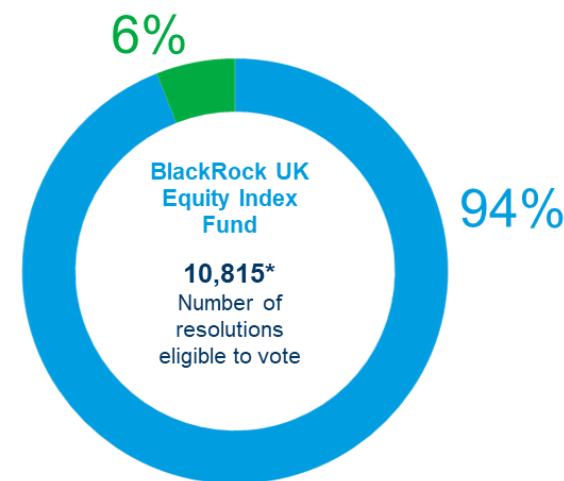
\*99% of resolutions voted on



\*99.8% of resolutions voted on



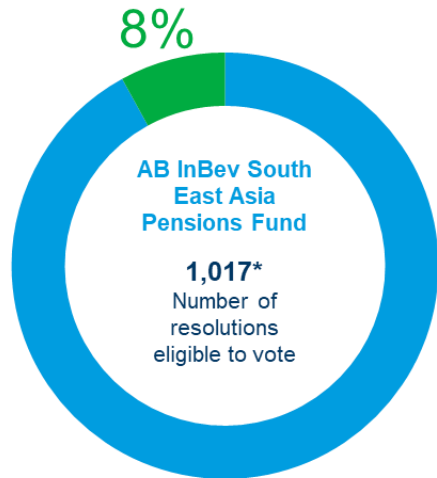
\*99% of resolutions voted on



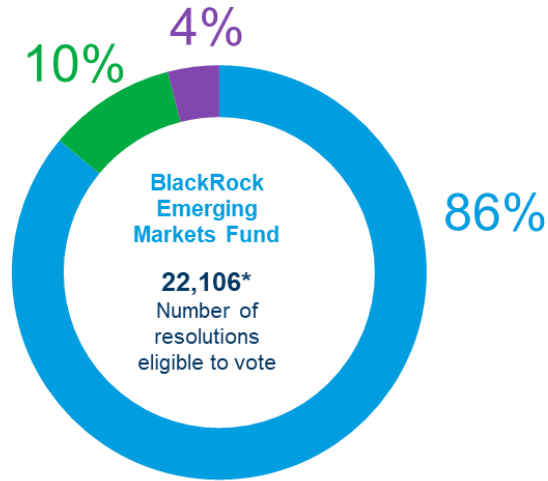
\*100% of resolutions voted on

Source: Fidelity and investment managers.

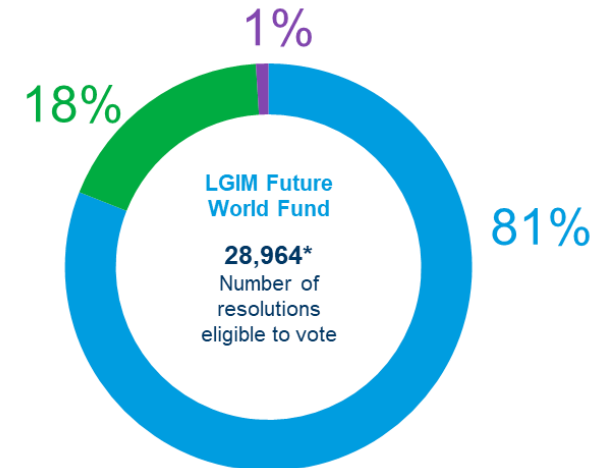
**AB InBev UK Limited Pension Plan (the 'Plan') – DC Section**



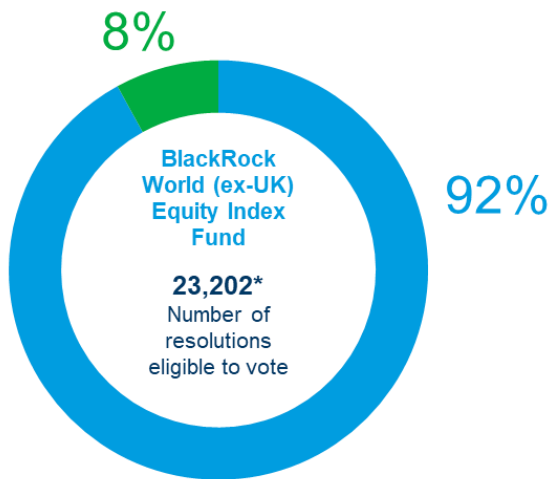
\*99.6% of resolutions voted on



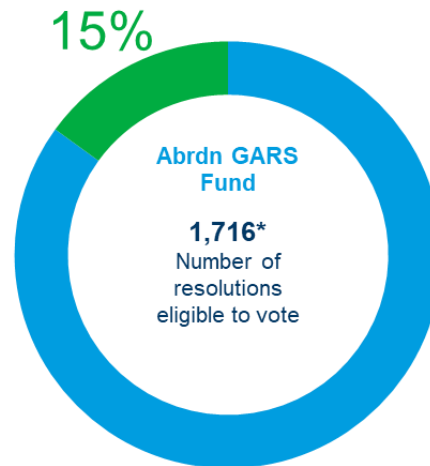
\*100% of resolutions voted on



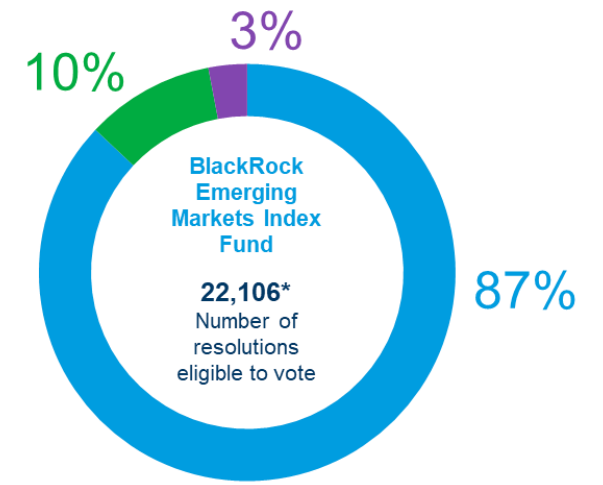
\*99.8% of resolutions voted on



\*99% of resolutions voted on

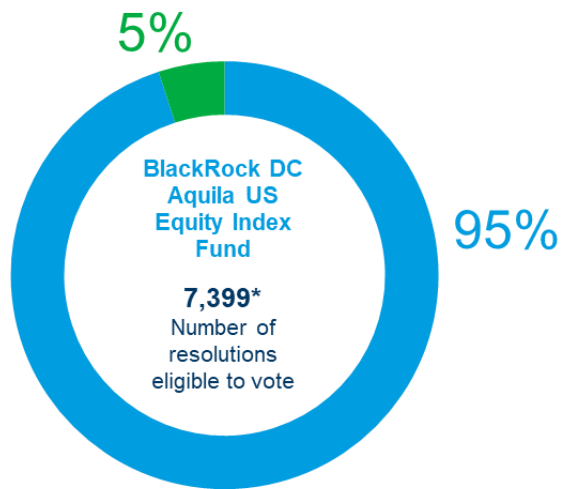


\*99.9% of resolutions voted on

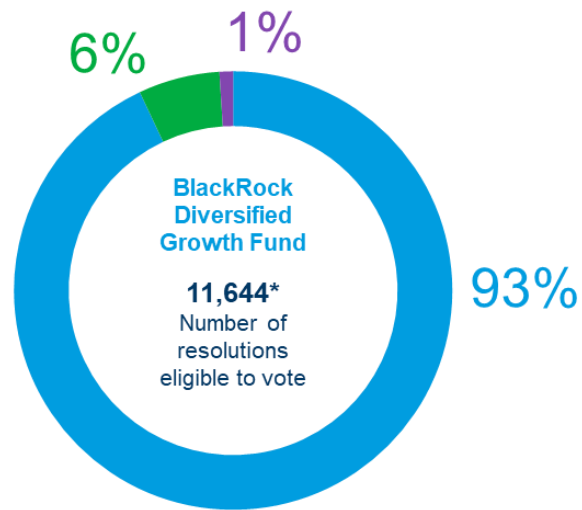


\*100% of resolutions voted on

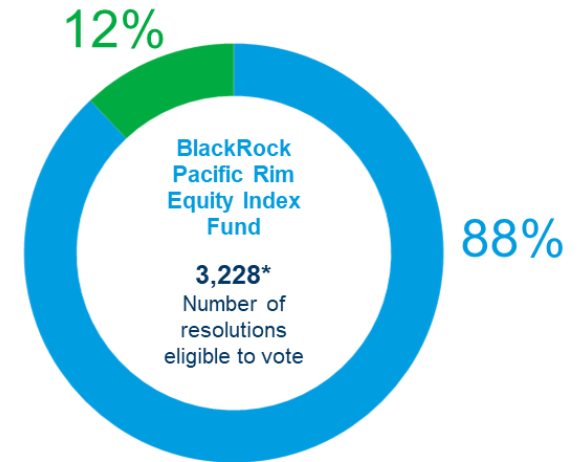
**AB InBev UK Limited Pension Plan (the 'Plan') – DC Section**



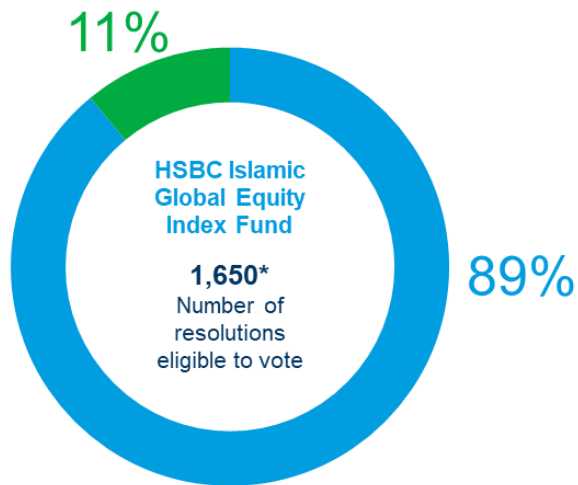
\*99% of resolutions voted on



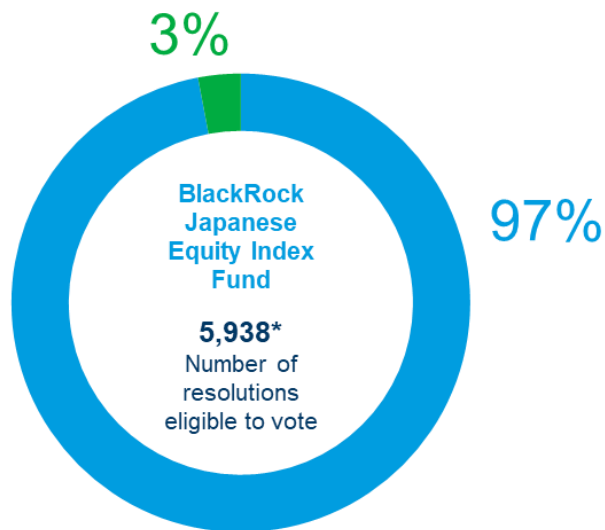
\*100% of resolutions voted on



\*100% of resolutions voted on



\*93% of resolutions voted on



\*100% of resolutions voted on

Source: Fidelity and investment managers.

At the time of writing, the Trustee hasn't received the voting activity for the BlackRock Market Advantage, BlackRock DC 50/50 Global Growth, BlackRock DC UK Growth, BlackRock Alpha Small Companies, BlackRock UK Special Situations and Aegon AM Ethical Equity Funds, but continues to seek this information.

## AB InBev UK Limited Pension Plan (the 'Plan') – DC Section



### Sample of significant votes

Managers have provided examples of significant votes across the funds previously noted as containing equity. It is not possible to disclose all the information received in this Statement. Therefore, examples of voting activity to include in this Statement were included focusing on areas including climate change/carbon emissions, separation of the role of CEO/Board Chairman and board diversity. The final outcome column below represents the result of the Resolution after all the votings: Passed (✓) or Not-Passed (✗).

Fund	Company	Date	How the manager voted	Summary of the Resolution	Rationale for the Manager vote	Final outcome
LGIM RIMA	Cigna Corporation	28/04/2021	For	Report on Gender Pay Gap	A vote in favour is applied as LGIM expects companies to disclose meaningful information on its gender pay gap and the initiatives it is applying to close any stated gap. LGIM views gender diversity as a financially material issue for its clients, with implications for the assets managed on their behalf.	✗
BlackRock DC 30/70 Hedged Global Equity	Tyson Foods, Inc.	11/02/2021	For	Report on Lobbying Payments and Policy	BlackRock believe it is in the best interests of shareholders to have access to greater disclosure on this issue.	✗
LGIM Diversified Fund	Intel Corporation	13/05/2021	For	Report on Global Median Gender/Racial Pay Gap	A vote in favour is applied as LGIM expects companies to disclose meaningful information on its gender pay gap and the initiatives it is applying to close any stated gap. LGIM views gender diversity as a financially material issue for its clients, with implications for the assets managed on their behalf.	✗
LGIM North America Equity Index	Wells Fargo & Company	24/07/2021	For	Report on Racial Equity Audit	A vote in favour is applied as LGIM supports proposals related to diversity and inclusion policies as they consider these issues to be a material risk to companies.	✗
BlackRock European Equity Index Fund	VINCI SA	08/04/2021	For	Approve Company's Environmental Transition Plan	None provided	✓
BlackRock UK Equity Index Fund	BP Plc	12/05/2021	For	Approve Shareholder Resolution on Climate Change Targets	BlackRock recognise the company's efforts to date but believe that supporting the proposal may accelerate the company's progress on climate risk management and/or oversight.	✗

## AB InBev UK Limited Pension Plan (the 'Plan') – DC Section

Fund	Company	Date	How the manager voted	Summary of the Resolution	Rationale for the Manager vote	Final outcome
AB InBev South East Asia Pensions	Weichai Power Co., Ltd.	28/06/2021	For	Approve Merger and Absorption of Weichai Power (Weifang) Intensive Logistics Co., Ltd.	Fidelity supported this resolution as it is in the best interests of the shareholders.	<input checked="" type="checkbox"/>
BlackRock Emerging Markets	JBS SA	28/04/2021	For	Approve Remuneration of Company's Management and Fiscal Council	Company has not provided justification for the proposed increase in remuneration cap.	<input checked="" type="checkbox"/>
LGIM Future World	Tyson Foods	19/05/2021	Against	Report on Human Rights Due Diligence	LGIM believes that companies in which they invest their clients' capital should uphold their duty to ensure the health and safety of employees over profits. While the company has health and safety, and code of conduct, policies in place and may have introduced additional policies to protect employees during the pandemic, there was clearly more it could have done. This is indicated by the reported complaints and rates of infection among its employee population. LGIM believe that producing this report is a good opportunity for the board to re-examine the steps they have taken and assess any potential shortfalls in safety measures so that they can improve controls and be better prepared for any future pandemic or similar threat.	<input type="checkbox"/>
BlackRock World (ex-UK) Equity Index	Union Pacific Corporation	13/05/2021	For	Publish Annually a Report Assessing Diversity and Inclusion Efforts	The Company does not meet BlackRock expectations for disclosure of material diversity, equity, and inclusion policies and/or risks.	<input checked="" type="checkbox"/>
Abrdn GARS	Microsoft Corporation	30/11/2021	Against	Report on Effectiveness of Workplace Sexual Harassment Policies	In response to allegations of sexual harassment, the company appears to have undertaken a thorough investigation, and now shares data on the number of complaints and outcomes of investigations with its employees annually. During recent engagement, Abrdn also learned that Microsoft has already committed to publicly report on the implementation of its sexual harassment and gender discrimination policies on an annual basis, thus addressing the requests of the shareholder proposal.	N/A

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Fund	Company	Date	How the manager voted	Summary of the Resolution	Rationale for the Manager vote	Final outcome
BlackRock Emerging Markets Equity Index	JBS SA	28/04/2021	For	Approve Remuneration of Company's Management and Fiscal Council	Company has not provided justification for the proposed increase in remuneration cap.	<input checked="" type="checkbox"/>
BlackRock DC Aquila US Equity Index	Exxon Mobil Corporation	26/05/2021	For	Report on Corporate Climate Lobbying Aligned with Paris Agreement	BlackRock believe it is in the best interests of shareholders to have access to greater disclosure on this issue.	<input checked="" type="checkbox"/>
BlackRock Diversified Growth	Chevron Corporation	26/05/2021	Against	Report on Impacts of Net Zero 2050 Scenario	The company already provides sufficient disclosure and/or reporting regarding this issue, or is already enhancing its relevant disclosures.	<input type="checkbox"/>
BlackRock Pacific Rim Equity Index	Rio Tinto Limited	06/05/2021	For	Approve Climate-Related Lobbying	BlackRock believe it is in the best interests of shareholders to have access to greater disclosure on this issue.	<input checked="" type="checkbox"/>
HSBC Islamic Global Equity Index	McDonald's Corporation	20/05/2021	For	Report on Sugar and Public Health	HSBC favour resolutions that request increased reporting & accountability on climate change issues.	<input checked="" type="checkbox"/>
BlackRock Japanese Equity Index	Sumitomo Corporation	18/06/2021	Against	Amend Articles to Disclose Plan Outlining Company's Business Strategy to Align Investments with Goals of Paris Agreement	BlackRock voted against as the proposal will not serve shareholder's interest.	N/A

Source: Fidelity and investment managers.

At the time of writing, the Trustee haven't received the voting activity for the BlackRock Market Advantage, BlackRock DC 50/50 Global Growth, BlackRock DC UK Growth, BlackRock Alpha Small Companies, BlackRock UK Special Situations and Aegon AM Ethical Equity Funds.