

ConocoPhillips Pension Plan

# Trustee's Climate Change report for the year ended 31 March 2026

For the period 1 April 2025 to 31 March 2026

[Pensions Updates | ConocoPhillips United Kingdom](#)

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## Glossary

|                                    |                                                                                                                                                                                                                                                                         |
|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Absolute Emissions</b>          | The total emissions attributable to the Plan's assets                                                                                                                                                                                                                   |
| <b>Carbon Footprint</b>            | The total carbon emissions per £ million invested (tCO <sub>2</sub> e/m invested)                                                                                                                                                                                       |
| <b>CO<sub>2</sub>e</b>             | Carbon dioxide emissions or equivalent.                                                                                                                                                                                                                                 |
| <b>ESG</b>                         | Environment, Social and Governance                                                                                                                                                                                                                                      |
| <b>EVIC Methodology</b>            | Enterprise Value including Cash methodology. Emissions are weighted across equity, debt and loans.                                                                                                                                                                      |
| <b>Net Zero Emissions</b>          | Generally implies an atmospheric state whereby anthropogenic GHG emissions to the atmosphere are counterbalanced by anthropogenic or natural removals or sinks.                                                                                                         |
| <b>Physical Risk</b>               | The direct effects of climate change on the sponsor covenant, the Plan and its members.                                                                                                                                                                                 |
| <b>Portfolio Alignment</b>         | The percentage of the portfolio aligned with a particular net-zero initiative                                                                                                                                                                                           |
| <b>Responsible Investment (RI)</b> | Making investment decisions and engaging with companies in order to encourage a positive impact on the world                                                                                                                                                            |
| <b>SBTi</b>                        | The Science-Based Target Initiative. An organisation that defines and promotes science-based emissions reduction targets. Further information can be found at <a href="https://sciencebasedtargets.org/how-it-works">https://sciencebasedtargets.org/how-it-works</a> . |
| <b>Scope 1 Emissions</b>           | Direct emissions from a company's owned or controlled sources. This may include emissions from a firm's manufacturing processes or emissions from company vehicles                                                                                                      |
| <b>Scope 2 Emissions</b>           | Indirect emission from the generation of purchased energy, such as heating for company facilities.                                                                                                                                                                      |
| <b>Scope 3 Emissions</b>           | All other indirect emissions, including those of suppliers and customers. These may include emissions related to the transportation and distribution of goods and disposal of waste generated in operations.                                                            |
| <b>Transition Risk</b>             | Risks and opportunities arising from efforts made to transition towards a net-zero economy (both domestically and globally) to limit climate change                                                                                                                     |
| <b>WACI</b>                        | Weighted Average Carbon Intensity. The total carbon emissions per \$ million of revenue of each holding in the portfolio (tCO <sub>2</sub> e/\$m revenue):                                                                                                              |

# Section 1: Introduction and Chair Foreword

## **A message from the Chair of the ConocoPhillips Pension Plan**

On behalf of the Trustee Board, I am pleased to present the Plan's fourth climate change report, displaying our continued progress in monitoring and mitigating the impacts of climate change on the Plan and the portfolio of assets it invests in.

As a Board, we continue to be aware that climate change represents a risk to the Plan and its members whilst offering a number of opportunities over the long-term. The Trustee therefore believes that it is best practice to keep these risks and opportunities under review and has developed an investment / funding / covenant strategy that we believe will allow us to monitor and mitigate these risks. This report offers a point of comparison from our previous reports and shows the progress made both over the year and since 2022.

Our work to evaluate the potential effects of climate change is designed to maintain the strong financial position of the Plan across the many different scenarios that the future could bring. The Trustee and its advisers continue to engage with our investment managers and regulators to better understand their approach and outlook and use this knowledge to inform and evolve the approach we take with the Plan's assets.

The Trustee reviews climate-related risks and opportunities on an annual basis. Any changes will be reflected in next year's report.

### The key takeaways for you from this report are:

- Overall, it is the Trustee's view that the Plan remains resilient to the risks of climate change, taking a holistic view across asset, liability and covenant risk. This resilience is enhanced by the further improvement in the funding position achieved over the year.
- We have a long-term goal of reaching net zero carbon emissions by 2050 and the Plan continues to be ahead of schedule in achieving this goal.
- The Trustee continues to regularly monitor each of the Plan's investment managers through an ESG lens, to ensure their actions remain consistent with our overall aims.

**Matt Pregler**

**Chair of the ConocoPhillips Pension Plan**

## Introduction

The Trustee Board of the ConocoPhillips Pension Plan (which we will refer to as the “Trustee” and the “Plan”, respectively) presents its annual report under the Occupational Pension Schemes (Climate Change Governance and Reporting) Regulations 2021 (the “Regulations”) for the period ended 31 March 2026. The principal employer of the Plan is ConocoPhillips (U.K.) Holdings Limited. The Plan provides DB benefits and is closed to new entrants, delivering benefits based on a member’s salary and length of service.

At the end of March 2026, the Plan had £1.4bn in assets. The Plan also allows members to pay Additional Voluntary Contributions (“AVCs”); however, the Trustee has not gathered climate data for these funds as the size of the assets (c.1% of the Plan as at 31 March 2026) are likely to have a minimal impact on the overall data and metrics.

The Plan is subject to the requirement to produce climate change disclosures in line with the above regulation. The aim is to improve and increase reporting of climate-related financial risks and opportunities across UK pension schemes.

The framework requires disclosures in four broad categories:

- **Governance** around climate-related risks and opportunities
- **Strategy:** the actual and potential impact of climate-related risks and opportunities on the strategy and financial plans of the scheme
- **Risk management:** how the scheme identifies, assesses, and manages climate-related risks
- **Metrics and targets:** the metrics and targets used to assess and manage climate-related risks and opportunities



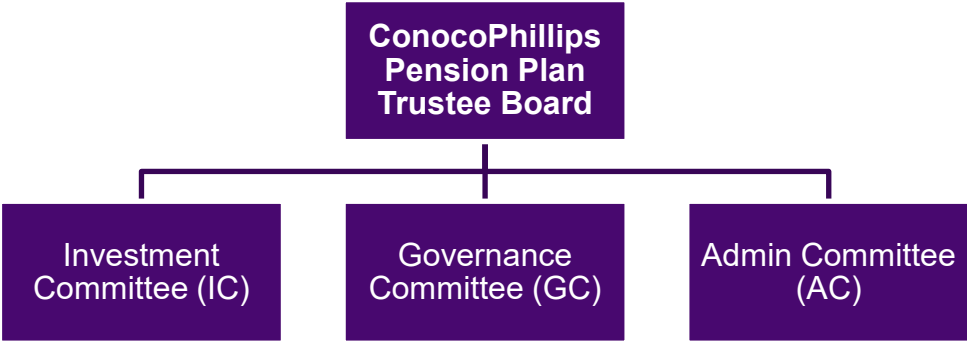
This report sets out the Trustee’s approach to compliance in each of these four areas.

# Section 2: Governance

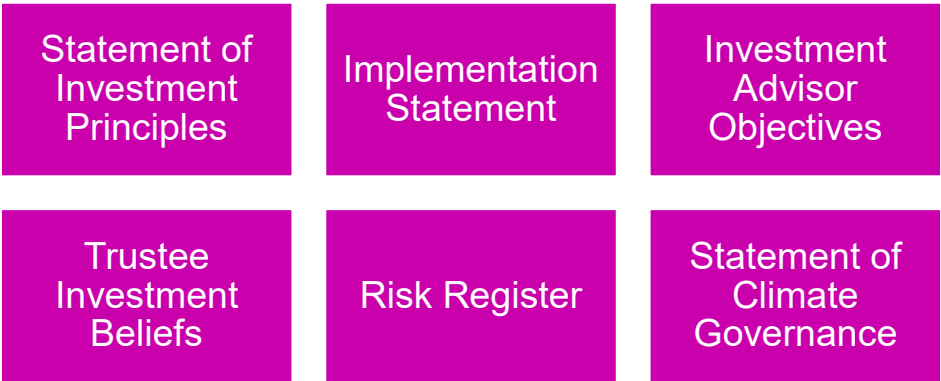
## The oversight of climate risks and opportunities

The Trustee is ultimately responsible for overseeing all matters related to the Plan, including climate-related risks and opportunities. The Trustee has therefore taken responsibility for reviewing the potential impact of climate change on the Plan’s assets, liabilities and employer covenant and integrating this into broader strategy, risk management and monitoring. However, in order to efficiently manage the wide range of issues to consider, a number of sub-committees have been set up to consider other specific areas of importance in greater levels of detail. The Trustee met five times over the 12 months to 31 March 2026 and discussed climate change in two of those meetings.

Ownership of the oversight of Responsible Investment (RI), including the risks and opportunities relating to climate change, has been delegated by the Trustee to the Investment Committee. The Investment Committee meets on a least quarterly basis, reporting on matters discussed and making recommendations to the Trustee Board following each meeting.

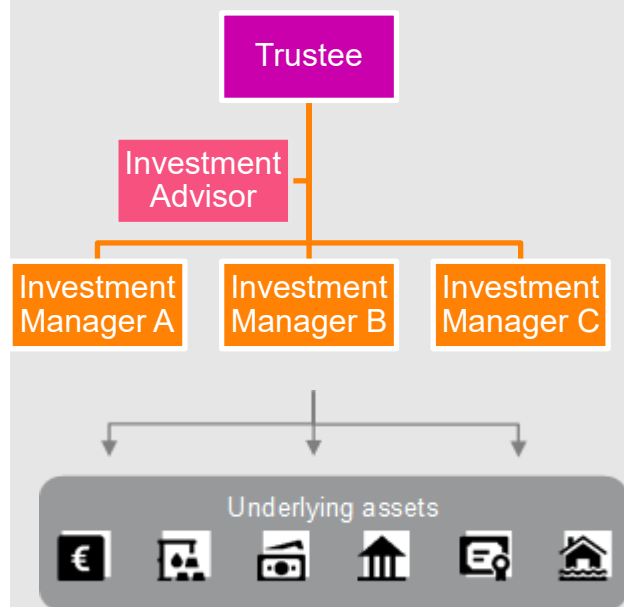


The Trustee recognises the importance of taking RI factors into account in its decision-making processes. The Trustee’s policies, beliefs and activities are documented through a range of climate related documentation:



In particular, the Trustee’s investment beliefs (which were reviewed during the current year) highlight key areas of focus for the Trustee, in particular the Trustee’s preference for engagement over exclusions in relation to the Plan’s investment portfolio and the Trustee’s desire to ensure alignment of its approach with that of ConocoPhillips Inc.

## How are the Plan's investments managed?



**Trustee** - The Trustee's key objective is to ensure sufficient assets to pay members' benefits as they fall due. The Trustee retains overall responsibility for the Plan's investment strategy but delegates some responsibilities to the Investment Committee to ensure they are undertaken by somebody with the appropriate skills, knowledge, and resources.

**Investment Advisor (WTW)** - The Trustee appoints an Investment Advisor to provide advice on, and support in managing, the Trustee's investment strategy. This includes advising on the allocation of the Plan's assets between asset classes and investment managers.

**Investment managers** - The Trustee appoints underlying investment managers using pooled vehicles. The Trustee will consider a range of financial and operational factors when selecting managers for each asset class.

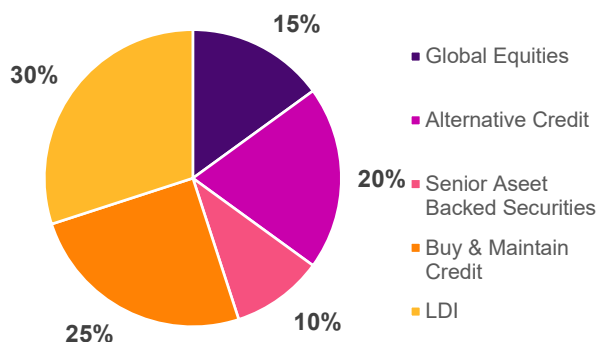
**Underlying assets** - The investment managers pick the underlying investments for their specialist mandate, e.g. shares in a company or government bonds

## Context of the Plan's circumstances

During the Plan year, the Trustee completed the implementation of the new portfolio structure agreed during the prior year. This is reflected in the chart to the right. The Plan remains in a strong financial position and was approximately 114% funded on its solvency (buy-out) basis as at 31 March 2026.

With this context in mind and recognising the relatively low risk position of the Plan's overall investment strategy, the Trustee has fewer tools at its disposal to address climate risk and access climate opportunities compared to some other pension schemes. The Trustee is not complacent about the risks and opportunities presented by climate change but is cognisant of ensuring its time and resources spent in this area are proportionate and efficient.

Strategic Asset Allocation (31 March 2026)



## Activities of the Investment Committee

The IC is made up of four members of the Trustee Board, who receive advice from the Plan's investment, actuarial, covenant and legal advisors as required. The key responsibilities of the IC are to implement and oversee the investment strategy for the Plan, as agreed by the Trustee Board. The Investment Committee held four quarterly meetings over the year and climate change was discussed in three of those meetings. The IC also held a number of additional ad hoc meetings to discuss specific topics, where climate change was discussed at two of those meetings.

Over the year to 31 March 2026, the IC undertook a number of activities designed to help it better understand the risks and opportunities associated with climate change and their possible impact on the Plan, comprising:

- **Manager Assessments** – Review of an assessment of the Plan's investment managers, specifically relating to their incorporation of ESG considerations into their investment process and their engagement activities. (*December 2025 IC meeting*)
- **Manager Presentations** – As part of the implementation of the updated investment strategy, the IC met with proposed new investment managers over the period covered in this report (M&G and Wellington). As part of these discussions and where relevant, each manager's approach to the management of climate risks and opportunities were discussed and considered prior to making the decision to invest.
- **Risk Register review** – Recognition of sustainability considerations, including the impacts of climate change, as a key risk for the Plan through its inclusion in the Risk Register. This documents the nature of the risk, the mitigants adopted and planned and the potential impact. (*September 2025 IC meeting*)
- **Advisor review** – The Trustee reviewed the Plan's investment consultant against its strategic objectives over the year, which included an assessment of their work in relation to ESG matters, including climate change. The Trustee was comfortable with the investment consultant's advice and support in this area. (*December 2025 IC meeting*)
- **Climate change reporting training** – The Trustee received further training on climate risk, including the additional actions required and recommended for their fourth annual climate change report. (*February 2026 IC meeting*)

## Service providers

The Trustee has prepared a "Trustee statement regarding the oversight of climate related risks and opportunities", which formally documents the roles and responsibilities both of the Trustee and the Trustee's advisors in relation to climate change and is provided as an appendix to this document. This statement identifies a range of service providers and sets out the expectations of the Trustee in relation to the services they provide to the Plan.

### Advisors

The Trustee engages with a number of advisors in relation to the overall management of the Plan and specifically in relation to climate change. The key advisors are:

Actuarial  
Advisor: WTW

DB  
Investment  
Advisor: WTW

Covenant  
Advisor:  
Mercer

Legal Advisor:  
Eversheds  
Sutherland

As part of its ongoing governance processes, the Trustee periodically undertakes assessments of each advisor's capabilities, including where relevant in relation to the incorporation of climate change risks and opportunities into the advice provided. At the Q4 2025 Investment Committee meeting, the IC received training on the investment consultant's approach to assessing investment managers from a Responsible Investment perspective together with its assessment of the managers held by the Plan. In addition to this, the Trustee has set formal objectives for the Plan's investment consultant, which incorporate the requirement to consider the risks and opportunities associated with all Responsible Investment matters, including climate change. The investment consultant is assessed against these objectives on an annual basis by the Trustee, which was last undertaken in Q4 2025.

The Plan's covenant adviser, Mercer, advises the Trustee in relation to the Plan sponsor's ability to support the Plan now, over the medium-term and into the future. Climate-related exposures could have a positive or negative impact on the strength of the Plan sponsor's covenant. Therefore, Mercer includes climate-related modelling and analysis in the covenant advice provided to the Trustee. Mercer will continue to assist the Trustee in monitoring and updating the Plan's climate change report on at least an annual basis.

### **Investment Managers**

The Trustee expects the Plan's investment managers to have integrated Responsible Investment considerations (including those relating to climate change) into their investment processes and decision making. The Trustee has delegated responsibility for stewardship to its investment managers, subject to oversight by the IC. Over the period covered by this report, the IC met with a number of the Plan's investment managers, including BlackRock, M&G and Wellington.

To ensure that its policies are being followed, the IC reviews each managers' approach to Responsible Investment annually, which includes the investment advisor's assessment of each manager's Responsible Investment capabilities alongside a bespoke questionnaire to understand recent developments in more detail. This provides the Trustee with a framework to monitor the managers and highlight any areas that may need further investigation. The Trustee last undertook this review at the December 2025 IC meeting.

## Section 3: Strategy

The Plan has a long-term obligation to meet member benefits and, therefore, adopts a long-term approach in its consideration of funding, employer covenant and Plan investments. The Trustee recognises that it is important to factor sustainability considerations, including the impact of climate change, into its long-term planning and investment decision making. The Trustee recognises in its investment beliefs that it is important to align its approach in this area with that of ConocoPhillips and has held a number of discussions with the Sponsor in order to fully understand the work being undertaken and the commitments made.

To support this, the Trustee has undertaken climate change scenario analysis to test the resilience of the Plan's funding strategy under a range of plausible climate scenarios. Importantly, the Trustee recognises that climate change could have a material impact on the investments of the Plan, the life expectancy of the Plan's members and the support provided by the Sponsor's covenant. All three aspects are therefore considered as part of this analysis. This scenario analysis was undertaken for the first time in 2021 and was most recently undertaken in 2025. No further scenario analysis was undertaken in the current year and a summary of the most recent results of this analysis have been provided in Appendix 1 to this report.

### Time horizons

When considering the potential risks and opportunities associated with climate change, the Trustee considers potential outcomes over a range of time horizons. The agreed time horizons for the Plan are shown below:

1. **Short-term:** The Trustee selected **2030** to represent its short-term time horizon, reflecting the period of expected near term changes in climate regulations and the current timeframe to which it is managing the Journey Plan.
2. **Medium-term:** The period to **2040** was selected to represent a medium-term time horizon, reflecting the period over which the Plan is expected to run-on for and where both transition and physical risks are expected to impact the Fund.
3. **Long-term:** The period to **2050** was selected to represent a long-term time horizon, being the period over which the Trustee expects to achieve its carbon reduction goal as set out later in this report.

The Trustee considers these timeframes to be appropriate considering the Plan's liabilities and its obligations to pay benefits.

When assessing risk, the Trustee considers this holistically in the context of liabilities, assets, covenant and members. The Trustee considers two major categories for climate-related risks and opportunities which it believes to be financially material for the Plan. Namely, risks and opportunities related to the transition to a lower-carbon economy and risks and opportunities related to the physical impact of climate change.

- **Transition risks.** This relates to the risks and opportunities arising from efforts made to transition towards a net-zero economy (both domestically and globally) to limit climate change. The financial impact of these risks and opportunities is generally expected to occur in the medium-term, with some perhaps occurring in the short term.
  - o Risks arising could include regulatory or societal changes rendering parts of the business of invested companies worthless. Transition risk with respect of the covenant arises from the nature of the Sponsor's business..

- Opportunities include early investment in assets, which are likely to benefit from climate change adaptations, such as green energy providers.
- **Physical risks.** This relates to the direct effects of climate change on the Plan and its members. Whilst these comprise both acute or short-term risks (e.g., extreme weather or wildfire events), and chronic or long-term risks (e.g., rising sea levels), the main financial effects are expected to be longer term in nature. An increased number and magnitude of extreme events may cause changes to the physical landscape, which could lead to assets being devalued or destroyed.
  - Risks arising include those directly impacting asset classes such as property or infrastructure, as well as the value of a company's equity and bonds if they own assets that are affected or if physical events impact their business model.
  - Changing temperatures is also expected to have a long-term impact on members.

The Trustee also recognises the existence of both regulatory risk (the risk associated with the increasing cost of complying with the increasing regulatory requirements around considering and reporting on climate change considerations) and reputational risk (the increasing spotlight on pension schemes and their approach to climate risk management, and the increased risk of being "named and shamed"). These risks are expected to be more relevant in the short to medium terms.

## Climate Scenario Analysis

When considering the results of the scenario analysis shown in Appendix 1, the Trustee noted that, due to running a relatively low risk asset portfolio, and the strong funding position on a solvency basis, the magnitude of climate risk is muted, particularly if experienced as an ongoing drag on investment returns. The Plan is more exposed to a one-off climate related shock, particularly in the short term and if this happens through the asset portfolio. The Trustee is confident that the Plan's investment and funding strategy is resilient to climate risk, particularly in the view of their long-term objective.

### Impact on Covenant

The Trustee's assessment, carried out by Mercer, has been focused on ConocoPhillips (the "Group"), given the integrated nature of the Plan's employer covenant. In the June 2025 assessment, the following three scenarios were used to assess covenant climate impact: Below 2°C; Delayed Transition; and Nationally Determined Contributions. These scenarios reflect a proportionate range of the scenarios considered by the investment and funding advisors.

The employer covenant scenario analysis highlights that the Group is sensitive to climate-related risks (both transition and physical) across the relevant time periods, through such mechanisms as demand changes, capital expenditure and direct carbon costs. However, the Trustee recognises the significant scope for management action to mitigate these risks and understands that the Group takes these risks into account in its own planning.

Overall, the Plan's strong funding position and the structure of its covenant support mean the Trustee considers climate risks are unlikely to undermine the Plan's employer covenant. Nonetheless, any modelling remains uncertain by nature and the Trustee will continue to monitor real-life developments to understand the emergence of risks in practice.

## Overall assessment

As a result of the combined analysis, the Trustee's assessment is that the Plan's investment and funding strategy is resilient to climate risk, particularly in the view of their long-term objective, and that the Plan is expected to be relatively well protected against the impact of climate change both as a gradual impact and a sudden shock. The Trustee has come to this conclusion based on the following factors:

- **The Plan's very strong funding position** – This was significantly over 100% on a solvency basis as at the date of the analysis conducted.
- **The Plan's low-risk asset portfolio** – The Plan holds a relatively small allocation to "return-seeking" assets and is largely invested in government bonds and high-quality (investment grade) corporate debt securities.
- **The protection provided by the covenant** – Although the Group is likely to be exposed to climate risks, the overall covenant structure and strong Plan funding level provides a robust safeguard against downside risks.

While the analysis reassures the Trustee about the robustness of the Plan's funding strategy, it also highlights that extreme climate change could impact the Plan's outcome and the strength of the sponsor covenant, even though it is broadly acknowledged that there is material uncertainty in aspects of climate scenario modelling. This reiterated to the Trustee that it warrants continued focus as part of the Trustee's broader sustainable investing activities and should remain a priority area for portfolio monitoring, stewardship activities and manager engagement.

The Trustee intends to update this analysis at least every three years and will be considering annually whether this needs to be done more frequently, including if there have been material changes to the scenarios used or the Plan's funding, covenant or investment strategy.

## Section 4: Risk Management

### The management of climate risk

Climate change poses a risk that could impact the financial security of members. Given this, the Trustee looks to measure and mitigate it, as it does with all of the key risks the Plan faces. As noted earlier, the Trustee has recognised sustainability risk (including the impacts of climate change) within the Plan's risk register together with the current and planned mitigants.

The risk register is reviewed annually by the Investment Committee and Governance Committee. As part of this process, the Trustee evaluates the risk level through two different channels, the likelihood of the risk occurring and the possible impact on the Plan, on a scale of 1 to 5. Sustainability Risk, which includes climate change and ESG factors, is considered explicitly as an Investment Risk. Additionally, the Covenant Advisor, Mercer, evaluates the potential financial impact of climate change on the Sponsor. Within the established risk framework, the Trustee considers Sustainability Risk to be one of the largest risks to the Plan. The risk register was last reviewed in September 2025.

Mitigation of the risks included in the register is a key responsibility of the parties involved in the production of the document. The Trustee has identified the following mitigating actions to address climate change:

- The Trustee receives training on sustainability topics as appropriate and as further legislation on the topic emerges.
- The Investment Consultant provides the Investment Committee with Sustainable Investment assessments of the investment managers they employ on an annual basis.
- The Investment Committee invites investment managers to attend meetings to encourage discussion regarding both investment topics and sustainability.
- The Trustee reviews an assessment of employer covenant strength which includes consideration of climate risk exposure informed by discussion with Group management at least annually.
- The Trustee produces and publishes an annual climate change report, which assesses the Plan's climate related risks and opportunities.

Alongside this, the Trustee has used assessed its long-term strategic objective and journey plan against the scenario analysis summarised in the previous section of this report to assess the potential top-down effects of climate-related risks upon the Plan. As a result, the Trustee has confirmed it is comfortable with the timeframe over which the Plan is expected to run-on, recognising that the Plan has achieved and exceeded its previous this journey plan objective to be 100% funded on a solvency basis, which is an important mitigating factor against climate risk.

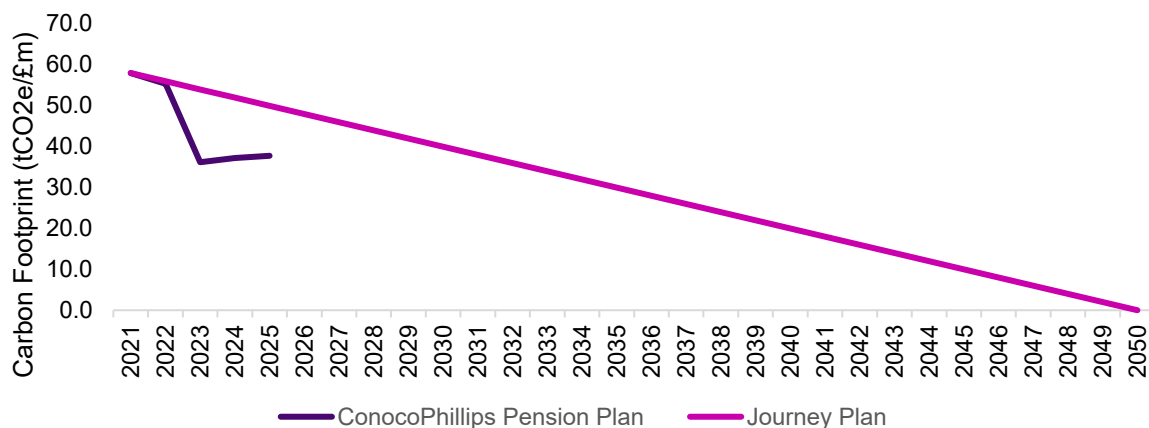
The analysis also suggests that the combination of physical and transition risks could have a notable impact on the extent to which the strong financial position achieved will be maintained and/or improved on, particularly if experienced through a one-off immediate shock, principally through the possible impact on member longevity. Recognising these possible effects, the Trustee continues to consider (and engage with the sponsor on) ways to further mitigate these risks in an efficient manner. The Trustee also recognises the potential benefits of further exploring the possibility of managing longevity risk within the Plan.

### Carbon Journey Planning

To manage the risks associated with climate change, the Trustee is in the process of developing a 'Carbon Journey Plan', which is intended to provide a framework to support the achievement of the

carbon emissions reduction target set out in the next section of this report. The Trustee would consider success under the framework of its carbon journey plan to be when it reaches net zero emissions, which would allow for a small amount of emissions that are offset.

## Carbon Journey Plan



### Notes to the Carbon Journey Plan:

1. The Carbon Journey Plan currently covers Scope 1 and 2 emissions, with the expectation that Scope 3 emissions will be included in future years once data availability and accuracy improve (see below). While the Trustee has collected (and is reporting on) Scope 3 emissions since the 2023/24 Plan Year, it is the view of the Trustee that the quality and reliability of Scope 3 emissions is not sufficient for it to be appropriate to include within the Trustee's Carbon Journey Plan.
2. The emissions associated with UK Government bonds will not be included in the Plan's Carbon Journey Plan monitoring as the Plan is required to hold UK gilts to hedge its pension liabilities and as such disinvesting on sustainability grounds would be inappropriate from a fiduciary duty standpoint. The Plan also has limited capability to effectively engage with the UK Government. The emissions from the UK gilts will still be calculated and monitored separately and calculated as the tons of carbon emissions per £m of nominal GDP, similar to WACI.
3. The base-year for the calculations is 2021. The Trustee agreed this date as it reflects when carbon data was first reported.

There are a number of ways in which the Trustee expects to achieve the Carbon Journey Plan objective over time:

1. **Stewardship:** This is a key way in which the Trustee can influence the actions of companies and broader industry and therefore mitigate the climate risk the Plan is exposed to and enhance the potential opportunities available as part of the transition.

The Trustee will aim to reduce emissions associated with the Plan's portfolio through changing the behaviour of the companies it invests in. The Trustee has formally adopted Climate Change as its key stewardship priority.

Over recent years, the Trustee has begun considering the embedding of mitigation of climate change risk within its strategy. Following on from the actuarial valuation at 31 March 2024, the Trustee has looked to maintain its strong funding position through investment in longer-dated assets to better match the Plan's liabilities. The nature of the mandates, specifically, the Buy & Maintain credit, provides an opportunity for better engagement with the companies invested in. As such, the Trustee has integrated the consideration of ESG factors within the selection of investment managers for the Plan, with input from the investment consultant. As part of its ongoing assessment of the Plan's investment managers the Trustee expects to observe integration of ESG factors within the strategy. The Trustee considers this to be one of the most effective methods of mitigating the investment risk associated with climate change.

Over the last year, the Trustee collected and reported on voting data from its passive equity manager within its annual implementation statement. The Trustee has also reviewed the stewardship practices of the underlying investment managers with a focus on assessing this relative to the Trustee's climate stewardship priority.

2. **Mandate changes including disinvestment:** Over time the Trustee expects to review mandate guidelines and restrictions, particularly in relation to disproportionately emitting strategies. Where investment managers are unable or unwilling to evolve their approach, this may ultimately result in the Plan selling assets if deemed necessary to do so. The Trustee may also consider the transfer of assets and liabilities to an insurer.
3. **Impact:** Whilst the Plan's investment strategy is relatively mature and low-risk, the Trustee will periodically review market opportunities to understand whether impact investments might be appropriate. These assessments will take into account the time horizons associated with the achievement of the Plan's investment strategy.
4. **Free rider:** Recognising common goals across the investment industry, the Trustee expects the Plan to benefit from the actions and efforts of other participants through a decline in the emissions associated with all asset classes.

## Section 5: Metrics and Targets

### Plan metrics

The pursuit of the Plan's ambitions to manage climate change risk has led the Trustee to set both a target and a number of metrics to assist it with tracking performance against the objective. The Trustee's goal of achieving net-zero emissions intensity is considered to be in the best financial interest of the Plan's members. We cover the target in more detail later in this section. The metrics have been set in line with the recommendations of the Pensions Regulator and the Department of Work and Pensions and are designed to provide the most useful information possible to the Plan's members. A more detailed description of each metric is provided below.

| Requirement                 | Metric                                                                           | Measurement as at 31 December 2025  |
|-----------------------------|----------------------------------------------------------------------------------|-------------------------------------|
| Absolute Emissions          | Total GHG Emissions                                                              | 51,686 tCO <sub>2</sub> e           |
| Emissions Intensity         | Carbon Footprint                                                                 | 37.6 tCO <sub>2</sub> e/£m invested |
| Forward-looking alignment   | Percentage of the portfolio aligned with approved Science-Based Targets (ex-LDI) | 36.4%                               |
| Other Climate Change Metric | Data quality                                                                     |                                     |

The climate reporting framework also requires the Trustee to define the scope of the emissions monitored, which are as follows:

- **Scope 1 Emissions:** direct emissions from a company's owned or controlled sources. This may include emissions from a firm's manufacturing processes or emissions from company vehicles.
- **Scope 2 Emissions:** indirect emission from the generation of purchased energy, such as heating for company facilities.
- **Scope 3 Emissions:** all other indirect emissions, including those of suppliers and customers. These may include emissions related to transportation and distribution of goods and disposal of waste generated in operations.

The data for the metrics has been collated using a combination of manager-provided data, proxied data based on sector/geographical breakdowns, and relevant benchmark data.

This analysis was initially conducted using data as at 31 December 2022 and since then the industry knowledge and requirements around the analysis have evolved. In the 2024 report, the Trustee started reporting Scope 1 & 2, as well as Scope 3 emissions where available. The Trustee expects Scope 3 emissions to become an increasingly important part of climate reporting given their material size, and therefore overall impact on metric changes. However, there remain significant concerns over the availability and accuracy of data in relation to scope 3 emissions. Therefore Scope 1 and 2 emissions are reported separately to Scope 3 emissions due to the differences in data quality and application, and the Trustee's net zero goal continues to relate to Scope 1 and 2 emissions only. Investments in LDI

(including UK Government bonds and swaps) and cash have also been reported separately due to the different calculation methodology compared to other assets.

The Trustee has attempted to collect data for each metric to the best of its ability as at 31 December 2025 and will track progress going forwards. Much of the initial exercise in gathering data has been delegated to the Plan's investment consultant in the first instance. The data quality is shown on page 21. The Investment Committee then has the responsibility to assess and raise any concerns regarding the data presented.

## Calculating the Plan's metrics

The Plan's metrics are calculated as follows:

### 1. **Absolute Emissions:** Total Carbon Emissions (Scope 1, 2 & 3)

| As at                              | 31 December 2025           | 31 December 2024           | 31 December 2023           | 31 December 2022          |
|------------------------------------|----------------------------|----------------------------|----------------------------|---------------------------|
| Total GHG Emissions (Scope 1 & 2)* | 51,686 tCO <sub>2</sub> e  | 50,875 tCO <sub>2</sub> e  | 54,513 tCO <sub>2</sub> e  | 81,594 tCO <sub>2</sub> e |
| Total GHG Emissions (Scope 3)*     | 432,018 tCO <sub>2</sub> e | 372,850 tCO <sub>2</sub> e | 387,424 tCO <sub>2</sub> e | N/A                       |

\*excludes emissions from the LDI portfolio

This metric measures the total absolute greenhouse gas emissions attributable to the Plan's assets. This can be used to give a sense of high/medium/low emissions and the associated exposure to a transition to a net-zero economy in the future.

The data for the metrics for the Plan's assets excluding LDI has been collated using a combination of manager-provided data, proxied data based on sector/geographical breakdowns, and relevant benchmark data. For the carbon emissions related metrics provided, the Trustee has compiled the data using investment manager provided data (which has been sourced from a range of external providers including MSCI). This data, where appropriate, has been validated against analysis undertaken through the investment advisor's ESG tool (which uses MSCI underlying data).

Where a company does not report emissions, the allocations have been scaled up to cover the entire portfolio.

There was a small increase in the Plan's Scope 1 and 2 absolute emissions over the year, while Scope 3 emissions increased more materially. This primarily reflected portfolio changes at 31 December 2025, including the addition of the Wellington and M&G asset backed securities mandates together with a lower allocation to LDI, which increased the share of non-LDI credit assets captured in the reported metrics.

The separate reporting of emissions from the LDI portfolio is based on guidance from the DWP and we expect this to remain a topic of discussion and evolve through time. This guidance is based on the inability of the Plan to influence the government's agenda in the coming year and the different calculation methodology and is explored later in the report. If we were to include the emissions of the LDI portfolio, the Plan's Scope 1 & 2 total GHG emissions would be approximately 46,758 tCO<sub>2</sub>e higher, totalling 98,444 tCO<sub>2</sub>e. As at 31 December 2025, the Plan's LDI mandate totalled £380.7m, equivalent to 27.8% of the Plan's investment portfolio. The Trustee followed the same approach used in previous years, basing the total emissions on the total UK Government Bond securities amount in the LDI portfolio.

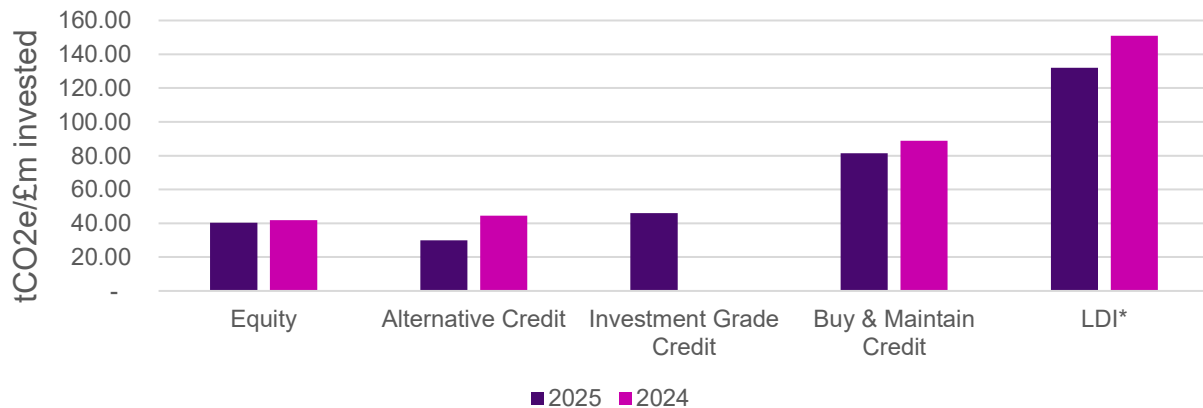
## 2. Emissions Intensity: Carbon Footprint (Scope 1,2 and 3)

| As at                                      | 31 December 2025            | 31 December 2024            | 31 December 2023            | 31 December 2022           |
|--------------------------------------------|-----------------------------|-----------------------------|-----------------------------|----------------------------|
| Carbon Footprint (Scope 1 & 2)*            | 37.6 tCO <sub>2</sub> e/£m  | 36.9 tCO <sub>2</sub> e/£m  | 36.1 tCO <sub>2</sub> e/£m  | 55.2 tCO <sub>2</sub> e/£m |
| Carbon Footprint (Scope 3)*                | 314.7 tCO <sub>2</sub> e/£m | 270.3 tCO <sub>2</sub> e/£m | 256.5 tCO <sub>2</sub> e/£m | N/A                        |
| *excludes emissions from the LDI portfolio |                             |                             |                             |                            |

Intensity metrics define emissions data in relation to an appropriate “per unit” of measure. Carbon Footprint calculated as the total carbon emissions per £m invested (tCO<sub>2</sub>e/£m invested). This calculation provides a figure that can be compared with other investors and which will be monitored by the Trustee over time as part of our ‘Carbon Journey Plan’, which is set out earlier in this report.

There was a small increase in the Plan’s emission intensity over the year, reflecting portfolio changes including the addition of the Wellington and M&G mandates, a lower allocation to LDI and a slightly higher relative weighting to the Buy & Maintain credit mandate. Changes in the underlying emissions data also contributed, with Buy & Maintain remaining a key driver. Overall, this resulted in the Plan’s carbon footprint increasing from 36.9 tCO<sub>2</sub>e/£m to 37.6 tCO<sub>2</sub>e/£m invested.

### Emissions Intensity by asset class



\*Estimated LDI emissions intensity excluded from the total Carbon Footprint as recommended by DWP guidance.

## 3. Forward-looking Alignment: Percentage of the Plan aligned with approved Science-Based Targets

| As at                                 | 31 December 2025 | 31 December 2024 | 31 December 2023 | 31 December 2022 |
|---------------------------------------|------------------|------------------|------------------|------------------|
| % aligned with SBTs (Total Portfolio) | 29.3%            | 23.3%            | 18.0%            | 19.2%            |

|                              |       |       |       |     |
|------------------------------|-------|-------|-------|-----|
| % aligned with SBTs (Ex-LDI) | 36.4% | 42.6% | 36.7% | n/a |
|------------------------------|-------|-------|-------|-----|

The carbon emissions metrics referenced above are backward-looking metrics and do not reflect any of the respective companies' ambitions to reduce their carbon emissions in the future. This metric is designed to assess the companies within the Plan's portfolio with stated net zero targets that are validated by the Science-Based Targets initiative ("SBTi"). The Science-Based Targets Initiative is a partnership between the Carbon Disclosure Project, the UN Global Compact, World Resources Institute and the World Wildlife Fund for Nature. The Initiative provides an external mechanism for companies to have their carbon reduction plans validated as being in line with an objective to limit global warming to 1.5 degrees.

During the year, the proportion of the Plan's portfolio aligned with approved Science-Based Targets decreased on an ex-LDI basis, from 42.6% to 36.4%, reflecting changes in the composition of the non-LDI portfolio, including the addition of new credit mandates with lower levels of SBT alignment than some of the existing holdings. By contrast, alignment increased on a total portfolio basis, from 23.3% to 29.3%, primarily because the allocation to LDI reduced by a greater amount over the year, increasing the relative weight of non-LDI assets within the total portfolio. The Trustee nevertheless expects the proportion of the Plan's investments aligned with this objective to increase over time as underlying companies continue to set and validate targets.

The Trustee reports the percentage of the Plan aligned with approved Science-Based Targets on both a total portfolio and an ex-LDI basis. The Trustee considers the ex-LDI measure to be the more useful indicator of underlying progress, as it removes the effect of year-on-year changes in the allocation between LDI and non-LDI assets.

#### 4. Other Climate Change Metric: Data Quality

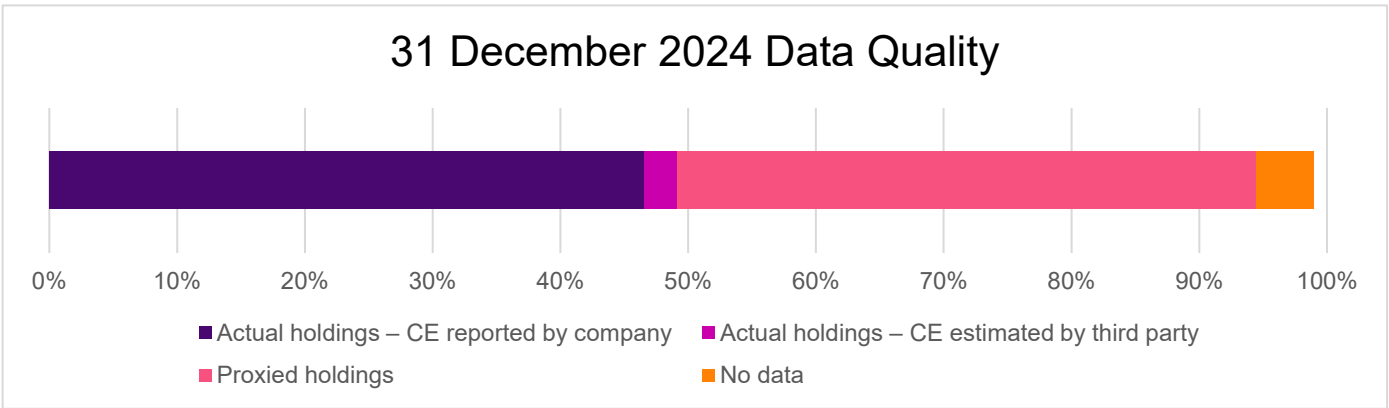
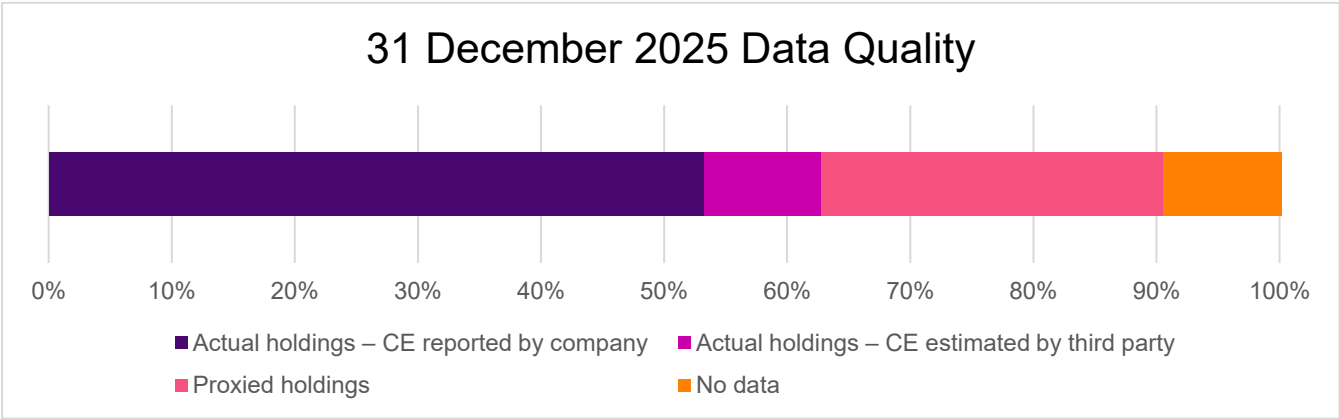
The Trustee has endeavoured to provide data on 100% of the Plan's DB assets. Given that both the absolute emission and emissions intensity metrics are limited by the availability of data, the Trustee has elected to provide more detail on the sources of the data used to compile this report.

The Trustee has relied on the Plan's managers to provide the emissions data on their holdings. For allocations where the investment manager could not provide emissions data, the Trustee scaled up the holdings for which data exists on a pro-rata basis. Compared with the previous year, the proportion of emissions data reported directly by underlying companies increased from 47% to 53%, and the proportion estimated by third parties increased from 3% to 10%. This is a positive improvement since 2023 when the Trustee started assessing these types of data quality. Proxied data reduced from 45% to 28%, although the proportion of assets for which no data was available increased from 5% to 13%, reflecting the inclusion of new mandates where data coverage remains less complete.

The Trustee has used MSCI to provide much of the Science-Based Targets data for individual companies held by investment managers. To inform the allocation to individual companies, the Investment Advisor was required to contact investment managers to source a complete list of companies held. The Investment Advisor then sought to reconcile identifiers within the portfolio with data provided by MSCI. In cases where identifiers could not be recognised, the Trustee scaled up the recognised holdings on a pro-rata basis. Where the manager was unable to provide data, exposure was proxied based on sector and geographical breakdowns and relevant benchmark data.

| As at                                         | 31 December 2025 | 31 December 2024 | 31 December 2023 |
|-----------------------------------------------|------------------|------------------|------------------|
| Actual holdings – CE reported by the company  | 53%              | 47%              | 31%              |
| Actual holdings – CE estimated by third-party | 10%              | 3%               | 5%               |
| Proxied holdings                              | 28%              | 45%              | 52%              |

|         |     |    |     |
|---------|-----|----|-----|
| No data | 13% | 5% | 12% |
|---------|-----|----|-----|



Reporting on Government Bonds

As referenced early in the report, the Trustee has agreed to exclude Government Bonds from the Plan’s target and to report the climate metrics for this asset class separately. The reason for the separate disclosure is because the underlying methodology is materially different, as are the potential actions available to the Trustee.

For UK Government Bonds, for example, the carbon emissions are calculated as the territorial emissions in the whole of the UK i.e. those that take place within a country’s territorial boundaries and include exports but omits imports. The denomination used to attribute emissions is the total amount of UK Government debt outstanding.

The rationale then for the current exclusion of UK Government bonds from the Plan’s target is as follows:

- The Trustee primarily holds Government bonds as assets to hedge the Plan’s liabilities and as such, even if reducing exposure to these assets would lead to an overall improvement in climate metrics, it would open the Plan up to excessive funding and investment risk

- The Trustee recognises that it has limited capacity and capability to engage with the UK Government on climate related metrics
- The level of financial risk arising from these assets is perceived to be much smaller i.e. the influence of climate change on the price of Government bonds in comparison to the other assets held is likely to be lower

Whilst the above provide the rationale as to why the Plan excludes liability hedging assets from the Plan's target, the Trustee still believes it is useful to monitor these figures over time. Therefore, the Trustee has reported emissions from the LDI portfolio separately in the section above.

## The Trustee's view on approaching Scope 3 emissions

Scope 3 emissions data is critical to help build a better picture as investment portfolios and economies are decarbonised. However, the Trustee believes that current reported scope 3 emissions data is largely inadequate for purposes including making accurate climate-informed investment decisions. Further, given data issues, the Trustee believes that disclosing the scope 3 emissions of investment portfolios at this stage will necessarily be limited in coverage, subject to large estimation errors, and not fit for meaningful comparison between investors or over time. At a minimum, the Trustee believes any scope 3 emissions disclosures should be disaggregated from Scope 1 and 2 emissions. The Scope 3 emissions are therefore outlined above separately from Scope 1 and 2 emissions.

Data providers, like MSCI, have tried to solve for this problem by providing scope 3 datasets using proprietary models and internally vetted methodologies. However, current solutions rely significantly on top-down sector emissions data with limited use of bottom-up data (which is company-specific). Models that rely on sector information limit users' ability to distinguish companies from peers. While there is sizable support from the investment industry and others for better disclosures, we need to be realistic around the current issues of reliability of scope 3 data available. Importantly, assessing risks and opportunities are not purely about emissions.

## Target

As stated above, The Trustee's goal of achieving Net Zero emissions intensity is considered to be in the best financial interests of the Plan's members. The Trustee set the goal in 2021.

As at 31 December 2025, the Plan's total absolute carbon emissions increased slightly and the emissions per £m invested also increased from the previous year, but the Plan remained well ahead of its carbon journey plan. The Trustee recognises that progress towards net zero is unlikely to be linear, particularly in a year where changes to portfolio structure and underlying data have impacted the reported metrics. The Trustee nevertheless believes the Plan remains well positioned relative to its long-term objective and will continue to monitor progress over time as data quality, market practice and the portfolio evolve.

As the industry continues to evolve, the Trustee is committed to keep working closely with its advisers, investment managers and the wider pensions community to push for higher standards and ensure that the Plan is in the right position to manage climate risks and capture opportunities in the transition to a more sustainable economy.

## Future actions

As a result of the analysis above, the Trustee has taken and/or committed to taking the below actions:

1. Assessing the Plan's stated metrics annually, as required by the regulation, and engaging with the reporting;
2. Considering the Plan's stated investment and funding strategy and objectives with a view to managing climate change risk through time; and
3. Engaging with the Plan's investment managers and advisors as appropriate to drive conversation around climate change and best practice.

The Trustee believes that the activities undertaken over 2025/2026 were consistent with the Plan's overall objectives including making progress towards the Plan's target. The Trustee will further investigate whether there any actions the Plan can take to better align the assets with net zero by 2050.

As reflected by the data quality metric there is considerable room for improvement in the reporting and calculation of these metrics. The Trustee, therefore, expects these metrics to evolve through time and will periodically review them to ensure ongoing appropriateness.

# Appendix 1: Summary of the climate change scenario analysis findings

As part of this analysis, the Trustee considered five separate scenarios which are in part defined through their success, or otherwise, in meeting the Paris Agreement target of a below 2.0°C temperature rise. These are the same scenarios that were included in previous reports.

The scenarios differ in the size of the physical risks, based on the resulting temperature impacts, but also in the size of the transition risks. We have assessed the transition risks and physical risks independently of one another when producing our expected impact on asset returns. The combination of the two has produced an expected percent per annum impact on an individual asset class over a period of twenty years. The effect on the Plan has then been calculated based on these impacts and the asset class weighting within the Plan's portfolio. The scenario analysis does not look to assess the relative likelihood of each scenario occurring.

## Impact on Funding Level

The projected impacts on assets and liabilities and the funding level were assessed under five different scenarios to the time horizons set out above.

The Trustee also assessed the impact of the market suddenly priced in the scenarios. In addition to the key assumptions set out above, this analysis assumes that liquid markets overreact, and therefore overprice the outcomes by a factor of 2.

|                         | Nationally Determined Contributions                                                                                                                                                                                       | Delayed Transition Below 2°C                                                                                                                                                                                                           | Below 2°C                                                                                                                                                                                                                    | Net Zero 2050                                                                                                                                                                                                                  | Hot House World                                                                                                                                                                                    |
|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Description</b>      | A "business as usual" outcome where current policies continue with no further attempt to incentivise further emissions reductions. Socioeconomic and technological trends do not shift markedly from historical patterns. | Delays in taking meaningful policy action result in a rapid policy shift around 2030. Policies are implemented in a somewhat but not completely co-ordinated manner resulting in a more disorderly transition to a low carbon economy. | Globally co-ordinated climate policies are introduced immediately, becoming gradually more stringent over time. Companies and consumers take the majority of actions available to capture opportunities to reduce emissions. | A more ambitious version of the 'Below 2°C' scenario where more aggressive policy is pursued immediately. More extensive technology shifts are achieved with Carbon Dioxide Removal ('CDR') used to accelerate the transition. | The world follows a Net Zero 2050 pathway, however the resultant temperature outcome exceeds 2°C due to a lower than expected remaining carbon budget and/or the impact of climate tipping points. |
| <b>Temperature Rise</b> | ~2.5°C                                                                                                                                                                                                                    | ~2.0°C                                                                                                                                                                                                                                 | ~2.0°C                                                                                                                                                                                                                       | ~1.5°C                                                                                                                                                                                                                         | ~3.0°C                                                                                                                                                                                             |

|                                                                            |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                   |
|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Renewable energy by 2050</b>                                            | c85%                                                                                                                                                                                                                                                                                                              | c90%                                                                                                                                                                                                                                                                                                              | c90%                                                                                                                                                                                                                                                                                                              | c90%                                                                                                                                                                                                                                                                                                              | c90%                                                                                                                                                                                                                                                                                                              |
| <b>Physical risk level (longer term)</b>                                   | High                                                                                                                                                                                                                                                                                                              | Medium                                                                                                                                                                                                                                                                                                            | Medium                                                                                                                                                                                                                                                                                                            | Low-Medium                                                                                                                                                                                                                                                                                                        | High                                                                                                                                                                                                                                                                                                              |
| <b>Transition risk level (shorter term)</b>                                | Low                                                                                                                                                                                                                                                                                                               | High                                                                                                                                                                                                                                                                                                              | Medium                                                                                                                                                                                                                                                                                                            | High                                                                                                                                                                                                                                                                                                              | High                                                                                                                                                                                                                                                                                                              |
| <b>Asset and liability return impacts (over 15-20 years)</b>               | The analysis shows that the impact of this scenario on the asset return was -0.18% pa along with a -0.02% pa impact on the liabilities from the impact of credit spreads. In addition, the analysis shows a -0.24% pa change to the liability return from the impact on longevity (all relative to the base case) | The analysis shows that the impact of this scenario on the asset return was -0.32% pa along with a -0.16% pa impact on the liabilities from the impact of credit spreads. In addition, the analysis shows a -0.10% pa change to the liability return from the impact on longevity (all relative to the base case) | The analysis shows that the impact of this scenario on the asset return was -0.14% pa along with a -0.04% pa impact on the liabilities from the impact of credit spreads. In addition, the analysis shows a +0.16% pa change to the liability return from the impact on longevity (all relative to the base case) | The analysis shows that the impact of this scenario on the asset return was -0.21% pa along with a -0.09% pa impact on the liabilities from the impact of credit spreads. In addition, the analysis shows a -0.03% pa change to the liability return from the impact on longevity (all relative to the base case) | The analysis shows that the impact of this scenario on the asset return was -0.36% pa along with a -0.11% pa impact on the liabilities from the impact of credit spreads. In addition, the analysis shows a -0.41% pa change to the liability return from the impact on longevity (all relative to the base case) |
| <b>Projected 2030 funding level relative to central expectation (119%)</b> | +2%                                                                                                                                                                                                                                                                                                               | -1%                                                                                                                                                                                                                                                                                                               | -3%                                                                                                                                                                                                                                                                                                               | -2%                                                                                                                                                                                                                                                                                                               | +1%                                                                                                                                                                                                                                                                                                               |
| <b>Projected 2040 funding level relative to central expectation (133%)</b> | +5%                                                                                                                                                                                                                                                                                                               | -2%                                                                                                                                                                                                                                                                                                               | -7%                                                                                                                                                                                                                                                                                                               | -3%                                                                                                                                                                                                                                                                                                               | +6%                                                                                                                                                                                                                                                                                                               |
| <b>Projected 2050 funding level relative to central</b>                    | +4%                                                                                                                                                                                                                                                                                                               | -5%                                                                                                                                                                                                                                                                                                               | -15%                                                                                                                                                                                                                                                                                                              | -7%                                                                                                                                                                                                                                                                                                               | +8%                                                                                                                                                                                                                                                                                                               |

|                                                                                          |     |     |     |     |     |
|------------------------------------------------------------------------------------------|-----|-----|-----|-----|-----|
| <b>expectation<br/>(161%)</b>                                                            |     |     |     |     |     |
| <b>Immediate<br/>change in<br/>funding level<br/>from an<br/>instantaneous<br/>shock</b> | -2% | -4% | -6% | -4% | -3% |

The analysis identified that, due to the impact of lower longevity improvements, the Hot House World scenario leads to a greater expected funding level by 2050. Below 2°C, with higher longevity improvements, causes the largest reduction in expected funding level improvement by 2050. As the Plan has achieved its Journey Plan objective, the different scenarios have no material impact on its achievability. This indicates that the potential for a climate shock would be a more material concern for the Plan.

# Appendix 2: Statement of Climate Governance

## **ConocoPhillips Pension Plan (the “Plan”) Trustee statement regarding the oversight of climate-related risks and opportunities**

Under the Occupational Pension Schemes (Climate Change Governance and Reporting) Regulations 2021 (the “Regulations”), ConocoPhillips Pension Plan Trustees Limited (the “Trustee”) as trustee of the Plan is required to establish and maintain oversight of the climate-related risks and opportunities that are relevant to the Plan. This statement has been prepared to set out the processes the Trustee has put in place to meet this requirement.

### **Overview**

The Trustee recognises that climate change may have a material impact on the assets and liabilities of the Plan and the sponsor covenant. Alongside this statement, the Trustee formally documents its approach to the management of climate risk in the Plan’s Statement of Investment Principles and in the Trustee’s Risk Register, both of which are subject to regular reviews and updates. The Trustee will also publish its annual climate change report following each scheme year end.

On an ongoing basis, in order to ensure that the risks and opportunities associated with climate change are appropriately understood and taken into account in decision-making, the Trustee has delegated detailed consideration of the subject to the Plan’s Investment Committee (“IC”) with support from external advisors and seeking input from the principal employer of the Plan, ConocoPhillips (U.K.) Holdings Limited, as well as from its US parent guarantors, ConocoPhillips and ConocoPhillips Company, where appropriate.

### **Roles and responsibilities**

#### ***Trustee Chair***

It is the Trustee Chair’s responsibility to ensure that sufficient time at Trustee Board and Sub-Committee meetings is allocated to the consideration and discussion of climate matters and that appropriate advice is provided at these meetings to permit decisions to be taken.

#### ***The Trustee Board***

The Trustee Board is responsible for:

- Putting in place and documenting effective governance arrangements to ensure appropriate management of climate related risks and opportunities and compliance with the Regulations. This includes:
  - Ensuring sub-committees have appropriate responsibilities to oversee this and that this is documented in their Terms of Reference.
  - Ensuring the Trustee Board has appropriate knowledge, expertise and resource to oversee and monitor activities undertaken on behalf of the Plan and that this is kept up to date.
  - Appointing and monitoring the advisors to the Board and the sub-committees and ensuring that they have the requisite knowledge and expertise.
  - Ensuring the Plan’s Statement of Investment Principles and Risk Register appropriately document the Trustee’s approach to managing climate-related risks within the Plan.

- Incorporating climate-related considerations into strategic decisions relating to the funding arrangements for the Plan.
- Allowing for climate-related considerations when assessing and monitoring the strength of the sponsoring employer and related entities.
- Communicating with fund members and other stakeholders on climate change where appropriate, including as part of the statutory reporting prepared by the Trustee.

### ***Investment Committee***

The Investment Committee is responsible for:

- Undertaking the necessary steps and commissioning work from the Committee's advisors as required to ensure that the Trustee is able to meet its requirements under the Regulations. This includes:
  - Regularly reporting to the Trustee Board on the steps taken to comply with the Regulations and seeking input from the Trustee where required.
  - Identifying and assessing the main climate-related risks and opportunities for the Plan over the short-, medium- and long-term.
  - Undertaking climate change scenario analysis for the Plan and determining the frequency with which this analysis should be refreshed.
  - Making recommendations to the Trustee Board on the appropriate climate-related metrics to monitor within the Plan and compiling the necessary data to produce the agreed metrics.
  - Making a recommendation to the Trustee Board on an appropriate climate-related target to set for the Plan and monitoring progress relative to this target over time.
  - Producing the annual climate change report for the Plan for consideration and sign-off by the Trustee Board.
- Incorporating climate-related considerations into strategic decisions relating to the investment arrangements for the Plan, including journey planning, portfolio construction, portfolio implementation and manager selection.
- Undertaking an annual review of the approaches taken by the Plan's investment managers to incorporate responsible investment considerations, including climate change, into the management of the Plan's assets.
- Meeting with the Plan's investment managers on a periodic basis to assess their approach to incorporating responsible investment considerations, including climate change, within their investment strategy, including holding the investment managers to account where it is considered that investment managers are not operating in line with best practice.

### ***Actuarial advisor***

The actuarial advisor is responsible for:

- Advising how climate related risks and opportunities might affect the Plan's funding position over the short-, medium- and long-term, principally through the input provided to the scenarios used for the climate change scenario analysis.
- Working with the Trustee's other advisors to incorporate climate change considerations into the overall strategic and funding advice provided to the Trustee.

### ***Investment advisor***

The investment advisor is responsible for:

- Incorporating climate change considerations into the investment advice provided to the Investment Committee and Trustee.

- Supporting the Trustee in ensuring an appropriate governance structure for the management of climate-related risks and opportunities, including undertaking regular reviews of the Plan's Statement of Investment Principles and Risk Register and the proposal of updates to these, where considered appropriate.
- Supporting the Investment Committee in incorporating climate-related considerations into strategic decisions relating to the investment arrangements for the Plan.
- Supporting the Investment Committee in its compliance with the Regulations, including providing advice on:
  - Climate change scenario analysis for the Plan, including appropriate short-, medium- and long-term time horizons over which to assess risk.
  - Appropriate metrics to adopt for monitoring climate-related risks and opportunities within the Plan.
  - An appropriate target to set for the Plan.
- Drafting a compliant climate change report for consideration by the Investment Committee.
- Providing training to the Investment Committee and Trustee Board on climate-related regulatory changes and other relevant climate-related matters.
- Supporting the Trustee Board in formulating its climate-related investment beliefs, documenting these and ensuring they are factored into the investment advice provided.
- Assessing the capabilities of the Plan's investment managers with regard to climate-related matters and advising the Investment Committee appropriately.
- Where required, engaging with the Plan's investment managers on the Investment Committee's behalf to communicate Trustee priorities and to improve the approach of the investment managers to the integration of climate change related considerations.

### ***Covenant advisor***

The covenant advisor is responsible for:

- Considering how climate-related risks and opportunities might affect the Plan's covenant over the short-, medium- and long-term.
- Leading on the inclusion of climate change in the Plan's covenant monitoring, working with the Trustee and its other advisers as appropriate.
- Providing covenant input to the climate change scenario analysis undertaken by the Trustee.
- Providing training and other updates to the Trustee on relevant climate-related covenant matters.
- Working with the Trustee's other advisers to assist the Trustee in incorporating climate change in its risk register, contingency planning and communication with stakeholders (including, but not limited to, its climate reporting) as appropriate.

### ***Legal advisor***

The legal advisor will provide assistance, when required, with:

- Providing training and other updates to the Trustee on relevant climate-related legal and regulatory matters.
- Ensuring the Trustee and its sub-committees are aware of their statutory and legal duties in relation to climate change.
- Where required, assisting the Trustee with documenting its approach to the management of climate related risks and opportunities in Plan documentation.

### ***Investment managers***

The Plan's investment managers are responsible for:

- Identifying, assessing and managing climate-related risks and opportunities in relation to the Plan's investments, in line with the Trustee's legal agreements with the managers.
- Exercising rights attaching to the Plan's investments and undertaking engagement activities with investee companies in a manner expected to improve long-term financial outcomes for the Plan's members.
- Reporting on stewardship activities and outcomes in relation to the Plan's investments.