Huntsman Pension Scheme

Annual implementation statement – for scheme year ending 31 March 2026

1. Introduction

This document is the annual Implementation statement (“the statement”) prepared by Huntsman Pension Trustees Limited (the “Trustee”) for the Huntsman Pension Scheme (“the Scheme”) for the year to 31 March 2026 (“the year”). The purpose of this statement is to provide:

- Details of how and the extent to which, in the opinion of the Trustee, the Trustee’s policies on engagement and voting (as set out in the Statement of Investment Principles (the “SIP”)) have been adhered to during the year; and

- A description of voting behaviour undertaken on the shares the Scheme held (including the most significant votes made on behalf of the Trustee) and any use of a proxy voter during the year.

A copy of this statement will be made available on the following website https://www.huntsman.com/locations/detail/6669/wilton-united-kingdom and included in the Trustee’s annual report and accounts for the year ending 31 March 2026.

Due to the type of assets held by the Scheme during the Scheme year (an annuity contract, a small holding in corporate bonds, a holding in property that was in the queue for being disinvested and a cash fund) a proportionate approach has been taken in preparing this statement.

2. Review of the SIP and changes made during the Scheme year

The SIP is a document which outlines the Trustee’s policies with respect to various aspects related to investing and managing the Scheme’s assets including but not limited to investment managers, portfolio construction and risks.

The Scheme could make use of a range of investments; therefore, the principles and policies in the Scheme’s SIP are intended to be applied in aggregate and proportionately, focusing on areas of maximum impact.

A copy of the Scheme’s SIP is also available on the following website https://www.huntsman.com/locations/detail/6669/wilton-united-kingdom.

The link above reflects the latest version of the SIP which is dated March 2026. The Trustee purchased a bulk-annuity policy to secure the vast majority of the liabilities of the Scheme with a reputable insurer (M&G) in March 2025. In light of this, the Trustee carried out a review of the Scheme’s investment strategy after the buy-in transaction and agreed a revised investment strategy which is set out in the latest version of the SIP shown above. This was implemented during the Scheme year ending on 31 March 2026.

The Plan’s assets are now predominantly made up of a bulk annuity insurance policy, as well as a holding in a cash liquidity fund and some small cash holdings in the Scheme’s bank account which are designed to cover residual liabilities.

Given this, the Trustee recognises that going forward, none of its assets will directly carry voting rights. Moreover, despite the Trustee fully recognising the importance of ESG considerations and climate risk, the nature of its assets means the ESG considerations for the Trustee will be extremely limited.

3. Trustee's engagement policy

The Trustee's policies on voting and engagement, as stated in the SIP, that were relevant in the Scheme year ending 31 March 2026, are as follows:

- The Trustee recognises that a company's long-term financial success is influenced by a range of factors including sustainable factors such as (but not limited to) those arising from environmental, social, and corporate governance (ESG) considerations, including climate change.

  Whilst it is the Trustee's preference that all companies should be run in a socially responsible way, it takes the view that its primary responsibility is to act in the best financial interest of the members of the Scheme.

- As the Trustee's focus is on financially material considerations, the Trustee's policy at this time is to not take into account non-financially material considerations.

  Due to the type of investment the Scheme holds and held during the year (noting it was already in the process of terminating its property investment), the extent to which ESG considerations may have a financial impact on the portfolio is extremely limited, although the Trustee has taken such factors into account in selecting the insurance provider and has sought to understand its chosen insurer's ESG credentials. The Trustee's policy is therefore to consider these issues on a very light-touch basis acknowledging that limited actions can be taken.

- These matters are kept under review by the Trustee, in consultation with its investment consultant.

- The Trustee does not directly hold any funds to which ordinary shares are an underlying asset class or directly hold any assets that include voting rights.

4. Voting activity

Throughout the Scheme year the Trustee held no assets that include direct voting rights and therefore there were no votes cast on the Trustee's behalf.

5. Conclusion

The Trustee considers that the Scheme's engagement policy was adhered to during the year.

Signed:…………………………………….

Date:……………………………………….