



# PensionBee UK Sustainability Report 2025

## How to use this Report

Our Sustainability Report is part of a suite of ESG reporting available for stakeholders. Further details on the location of our different disclosures are below.

ESG Disclosure	Location
Streamlined Energy Carbon Reporting (SECR)	<a href="#">Annual Report and Financial Statements 2025</a> >
Task Force on Climate-related Financial Disclosures (TCFD)	<a href="#">Sustainability Report</a>
ESG Data Book	<a href="#">ESG documents hub</a> >
Materiality Assessment	<a href="#">Sustainability Report</a>
ESG Goals	<a href="#">ESG documents hub</a> >
Voting Choice Report	<a href="#">ESG documents hub</a> >
ISS SRI Voting Guidelines	<a href="#">ESG documents hub</a> >
Sustainability Accounting Standards Board (SASB)	<a href="#">ESG documents hub</a> >
Workforce Disclosure Initiative (WDI)	<a href="#">ESG documents hub</a> >

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# 1 Our Sustainability Approach

Our commitment to sustainability principles remains fundamentally important to our business and long-term decision-making. As a long-term asset owner and guardian of our customers' pensions, we recognise that investing responsibly today, is helping to build the resilient society that our customers need to retire safely tomorrow.



1

## Delivering long-term value for all our stakeholders

Our customers trust us with their retirement savings. That trust guides everything we do.

Our mission is to build retirement confidence, and as such we focus on helping people feel informed, supported and in control of their pensions, from switching and consolidation, to planning and retirement income. By considering long-term risks and opportunities, including economic, technological and regulatory change, we aim to protect and strengthen customer outcomes over time.

This commitment is reflected in our efforts to support our customers' financial wellbeing, which we do through clear retirement tools and educational content, accessible services and practical support at every stage of their journey. We also act as a champion of our customers' interests in the retirement system, to try to ensure the UK policy landscape meets their needs.

2

## Building a resilient and responsible business

A strong, responsible business is better placed to support customers over the long-term.

We maintain the highest standards of governance. We operate transparently and manage risk carefully. At the same time, we invest in our people and culture, recognising that engaged, supported colleagues are central to delivering high-quality service to our customers.

We also take our environmental responsibilities seriously, understanding that climate and nature-related risks can affect long-term investment returns and financial stability.

3

## Acting as a good corporate citizen

As an online retirement savings provider with approximately £7.4bn in Assets under Administration on behalf of 305,000 Invested Customers, we can play an active and important role in the wider financial system.

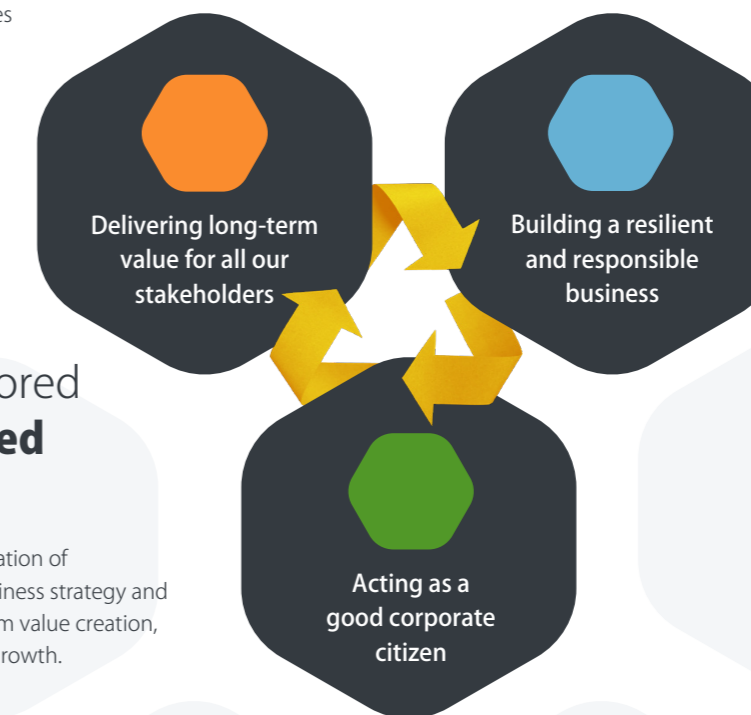
We use our influence responsibly, through stewardship, voting and engagement, to support well-run companies, fair treatment of workers, and strong environmental and governance standards. We also engage constructively with regulators and policymakers to promote outcomes that benefit savers.

Alongside this, as a regulated business with a public listing, we hold ourselves to the highest standards of ethics, compliance and accountability in how we operate.

### Sustainability framework

Our sustainability framework is anchored by **three interlinked responsibilities**

We define sustainability as the integration of non-financial considerations into business strategy and decision-making, to support long-term value creation, business resilience, and responsible growth.



# 2 2025 Highlights

PensionBee as a consumer champion

Customers & Financial Wellbeing

10-day Pension Switch Guarantee campaign

**16.7k**

parliamentary petition signatures calling for mandatory electronic pension transfers and higher industry standards



See more on p. 16

People, Culture & Inclusion

PensionBee as a responsible employer

Supporting employee wellbeing

**79**

Work Wellbeing Score based on Indeed's external benchmarking methodology (where >75/100 is considered excellent).



Strong performance across key drivers:

- Purpose: **85**
- Job satisfaction: **80**
- Happiness at work: **79**

See more on p. 20

Stewardship & Active Ownership

PensionBee as a responsive asset owner

Climate Plan customers' priorities

**75%**

of Climate Plan survey respondents support AGM shareholder resolutions that support positive change

See more on p. 26

**73%**

of Climate Plan survey respondents told us they want to see us work with investor coalitions for greater impact



Planet & Climate Action

PensionBee's commitment to net zero

Our progress in reducing our carbon footprint

**6%**

annual decrease in the total energy consumption of the UK office

**3rd**

consecutive year of reduction in absolute emissions of Scope 2 carbon footprint (tCO<sub>2</sub>e) in the UK office

See more on p. 43



Governance, Ethics & Transparency

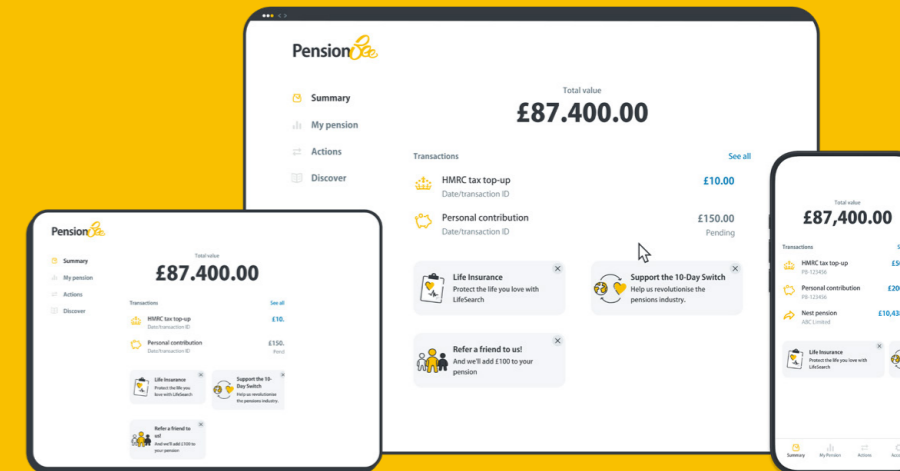
PensionBee's commitment to inclusive and accessible product design

Launching our Global Component Library

**100%**

of relevant user interface elements in our Global Component Library have accessibility standards built into them

See more on p. 46



# 3 ESG Strategy

We believe that managing our environmental, social and governance ('ESG') priorities well helps us stay resilient and creates lasting value for our customers and wider stakeholders.

We submit our ESG data as part of voluntary disclosure, but also work with raters that wish to score us, further details of which are below. We are open about our longer term ESG goals and how we are performing against them, sharing clear data and updates so that stakeholders can see our progress and hold us to account.

Our ESG Data Book is updated annually and provides a year-on-year snapshot of our ESG metrics. You can find the latest version [here](#).

## Materiality Assessment

We conducted our first [ESG Materiality Assessment in 2022](#).

The aim was to gain a clear understanding of the environmental, social and governance issues that matter most to our stakeholders. Each year since then, we have reviewed our assessment to ensure it continues to reflect stakeholder priorities and supports effective decision-making across the business.

In 2025, we undertook a further materiality assessment to ensure that the sustainability issues we prioritise remain the most relevant to our business and stakeholders, and to understand how stakeholder sentiment has evolved over time. This tri-annual process enables us to focus our resources on areas where we can deliver the greatest long-term value and positive impact.

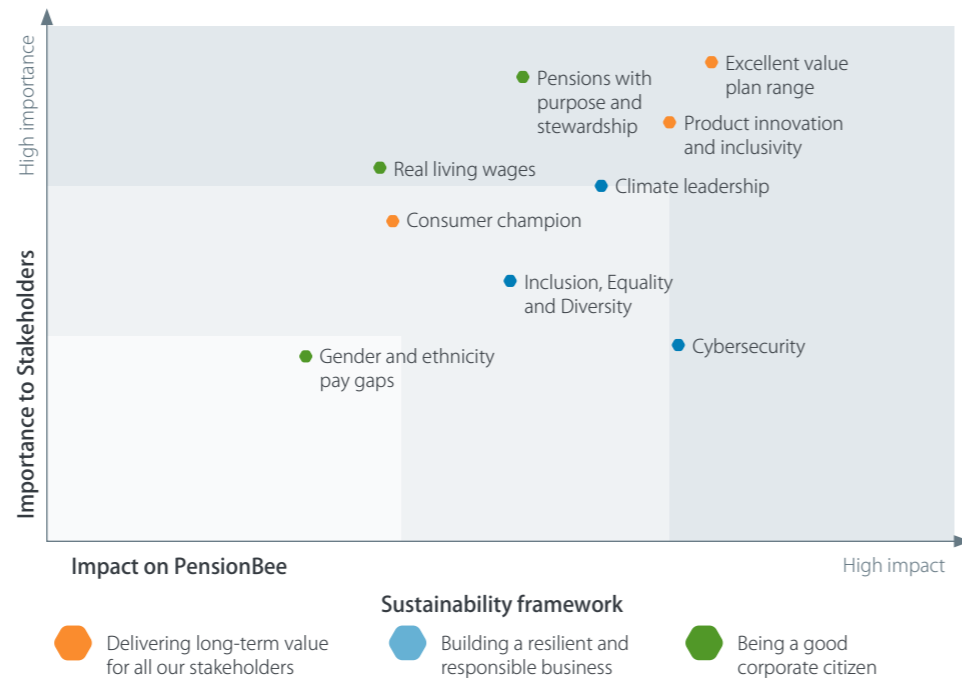
As part of this review, and in line with our continued growth and the evolving regulatory and societal landscape, we refreshed our materiality topics, simplifying them from 15 to 9. We then engaged with our key stakeholder groups to rank these topics in order of importance.

All nine topics identified through this process matter to our long-term success. We know that different groups care most about different issues, and we listen carefully to these perspectives when shaping our priorities. We aim to take a balanced and thoughtful approach that reflects the needs of our customers, colleagues, partners, and wider society.

As our sustainability approach has matured and our material topic set has become more focused, we have adopted a clustered approach to materiality. Rather than ranking issues in hierarchical tiers, we group our material topics according to how they support our three interlinked sustainability responsibilities: delivering long-term value for stakeholders, building a resilient and responsible business, and being a good corporate citizen.

The outcomes of this assessment inform our disclosures and support our commitment to transparency, good governance and regulatory compliance.

Materiality Matrix



## ESG Goals (UK Focus)

Description	Activities	Progress in FY 2025	Goals	Status Update	Alignment with UN Sustainable Development Goals ('SDGs')
<b>Excellent Value Plan Range</b>					
<b>To offer market leading investments that generate returns for our customers</b>	<ul style="list-style-type: none"> <li>Annual Value for Money exercise (part of FCA's Consumer Duty) to compare the price and performance of our investment solutions and ensure we continue to offer excellent value for money for our customers.</li> <li>Externally scoring our plans against accumulation and decumulation defaults in the UK personal pensions market.</li> <li>Working with our Governance Advisory Arrangement ('GAA'), ZEDRA Trustees, to assess value for money in our decumulation pathways range.</li> <li>Continuing to deliver rapid customer service across all channels.</li> </ul>	<ul style="list-style-type: none"> <li>Maintained an 'Excellent' value for money score from our GAA, ZEDRA Trustees, for the third year running (2024: Excellent).</li> <li>Achieved an average AgeWage score of 81 (2024: 81) for our plan range (a score of 50 is above average).</li> </ul>	<b>'Excellent'</b> or <b>'Good'</b> value for money score from our GAA (yearly goal)		 
<b>Product Innovation and Inclusivity</b>					
<b>A product that is simple, safe and reactive to changing customer needs, designed with a range of needs and vulnerabilities in mind, whilst enhancing access to financial products and knowledge</b>	<ul style="list-style-type: none"> <li>Investing in scalable digital infrastructure to support future app and web platform improvements and inclusive feature development.</li> <li>Incorporating continuous customer feedback on accessibility barriers to improve language, layout and interaction design.</li> <li>Enhancing our withdrawal features and journey to support personalised retirement income planning by modelling income, tax relief and drawdown scenarios through interactive digital tools.</li> <li>Expanding access to clear educational guidance on retirement decisions, improving customer understanding and confidence.</li> <li>Providing plain-language educational content on a range of personal finance and pensions topics, including, taxation and withdrawal options.</li> </ul>	<ul style="list-style-type: none"> <li>Implemented a single, unified user experience across mobile and web platforms, strengthening accessibility and usability.</li> <li>Embedded accessibility outcomes at a foundational level through a shared design and testing system to ensure reliability against recognised accessibility standards and compatibility with assistive technologies.</li> <li>Introduced the Regular Withdrawals feature, enabling automated monthly retirement income and improved tax and cash-flow planning.</li> <li>Developed and enhanced the Retirement Planner hub, providing interactive calculators and personalised forecasts.</li> <li>Launched the Pension Drawdown page to clearly explain drawdown options and support customer understanding of income choices in retirement.</li> <li>Maintained an Excellent Trustpilot score of 4.6★ (2024: 4.7★).</li> </ul>	<b>Maintain a 4.7 / 5</b> aggregated App Store and Google ratings (yearly goal)		 

**Pensions with Purpose and Stewardship**


**A responsible plan range focused on creating a safer, fairer, kinder future whilst using voice and vote to drive positive change in companies**


- Inviting the majority of our customer base to share their investment views and ensuring this aligns with our voting policy.
- Supporting environmental and social shareholder resolutions through Voting Choice.
- Engaging with investee companies to encourage good business practices.
- Increasing our work on the impact of investee companies on public health as one of our customers' priorities.
- Developing our plan offering in response to customers' feedback.
- Monitoring our money managers' stewardship practices.

- Surveyed customers in the Tracker and 4Plus Plans to ensure that our Voting Choice policy aligns with their changing views and needs.
- Improved our default plan range based on years of customer feedback, aligning each plan with specific investment preferences and long-term goals.
- Expanded our exclusionary screens policy, removing the gambling sector from Global Leaders, our under 50s default plan.
- Supported high-profile shareholder resolutions on real living wages, AI governance, antimicrobial resistance and environmental disclosures to reflect strong customer support for these themes.
- As members of the Good Work Coalition, we joined group engagements to encourage management to progress towards real Living Wage accreditation, particularly extending the real Living Wage to third-party contractors.
- Continued to collaborate and engage with ShareAction's Long-term Investors in People's Health (LIPH) initiative.
- Published PensionBee Engagement & Voting Choice Report 2025.

**100% of eligible customers** invited to share their voting views via survey or interview (yearly goal)

**Implement an enhanced voting policy** for the Climate Plan (by 2026)



**Cyber Security**

**Cyber security practices in place to ensure the highest levels of protection**

- Maintaining an ISO/IEC 27001:2022 certified Information Security Management System (ISMS) and ensure ongoing alignment with a Zero Trust based cybersecurity strategy.
- Embedding a Zero Trust, defence-in-depth security model across the organisation, incorporating layered controls including device malware protection, strong identity and access management, multi-factor authentication, and continuous monitoring.
- Strengthening human cyber risk management by operating an enterprise cyber awareness and training programme, including organisation-wide monthly phishing simulations introduced in 2025 to continuously raise awareness and improve user resilience.

- Achieved 99.9% Website and App Uptime Availability in 2025 (2024: 99.9%).
- Achieved a 5% Email Phishing Test Click Rate Average for 2025 which was a reduction on previous years (2024: 8.8%).
- Deployed more sophisticated phishing techniques and software capability.

**0 incidents** that have a meaningful impact on confidentiality, integrity or availability in the production environment (yearly goal)

- Operating and maturing a 24x7 Security Operations Centre (SOC) to provide continuous monitoring, early detection, and response to potential malicious activity.
- Improving asset visibility and control through the adoption of an enterprise IT asset management platform, supporting stronger governance, lifecycle management, and security oversight.
- Maintaining Cyber Essentials Plus certification, demonstrating compliance with UK government-backed baseline security controls and reinforcing assurance to customers, partners, and auditors.






**Inclusion, Equality and Diversity**

**Fostering an inclusive culture where everyone feels satisfied, supported, and purposeful, recognising that the wellbeing of our people, customers, and business is deeply connected**

- Ensuring we offer an inclusive compensation package, regularly benchmarked and adjusted to meet industry levels.
- Providing transparent salary ranges for each level, with salaries always posted on job adverts.
- Providing for differing needs such as paid time-off for carers, disability leave, gender inclusive parental leave.
- Providing fair and equitable access to opportunities including blind internal hiring and clear, consistent performance policies.
- Delivering a full annual programme of Hive & Thrive awareness months, strengthening inclusion and cross-cultural understanding.
- Providing access to learning, mentoring and internal progression pathways to support career development and equal opportunity.
- A zero-tolerance approach to bullying, harassment, victimisation and discrimination.
- Maintaining our Level 2 Disability Confident Employer status.

- Introduced a tri-annual Wellbeing Survey to monitor satisfaction, purpose, happiness and stress, and inform targeted actions.
- Achieved an overall Work Wellbeing Score of 79, with strong scores for purpose (85), job satisfaction (80) and happiness (79) (with >75 being considered excellent).
- Recorded the highest wellbeing survey response rate to date (59%), indicating strong workforce engagement.
- Launched the Six Bees of Wellbeing Framework to support inclusion, engagement, development, and fair reward across the organisation.
- Maintained strong gender representation, with 50% female representation in Executive Management and 57% at Board level.
- 14% of the Board identified as coming from a minority ethnic group (2024: 14%).
- Retained Disability Confident Level 2 status, reinforcing inclusive recruitment and workplace practices.
- Maintained open engagement channels, including CEO Q&A sessions, mentoring programmes, and anonymous feedback mechanisms.
- Received external recognition, including FTAdviser Diversity in Finance Award, Trailblazing Company of the Year.

**A Work Wellbeing Score of at least 75 Exceeding industry averages** across every department and management level for demographic data

## Climate Leadership

**A pension provider that is focused on a climate transition that is safe and fair for all**

- Making progress towards our near-term (2030) and long-term (2050) net zero targets for carbon emission reduction across the business and asset base.
- Updating our public targets to reflect changes in our business where necessary.
- Ensuring we monitor the latest in climate science and reviewing public targets as appropriate.
- Decarbonising the portfolio through additional ESG screening in our plans.
- Enhancing reporting disclosure boundaries for Scope 1, 2, and 3 (Categories 1-15).
- Continued reporting our progress against our interim and long-term net zero targets for global Scope 1, 2, and 3 emissions, in line with 1.5C goals of the Paris Agreement.
- Cloud-hosted web services powered by 100% renewable energy.
- Continued to include the energy usage from our global operating sites in Scope 1 and 2 emissions.
- Started including the operational emissions from the Uruguay office, alongside the UK and US, into the global Scope 1 and 2 emissions disclosure, using the regional emissions factor.
- Continued reporting on six categories of global Scope 3 emissions.
- Identified an additional Scope 3, Category 11, 'Use of Sold Products', for customer usage of the PensionBee app, reporting from 2025.

Reporting on progress against our science-based public **net zero 2030 and 2050 targets** that align with 1.5C Paris Agreement goals (yearly target)



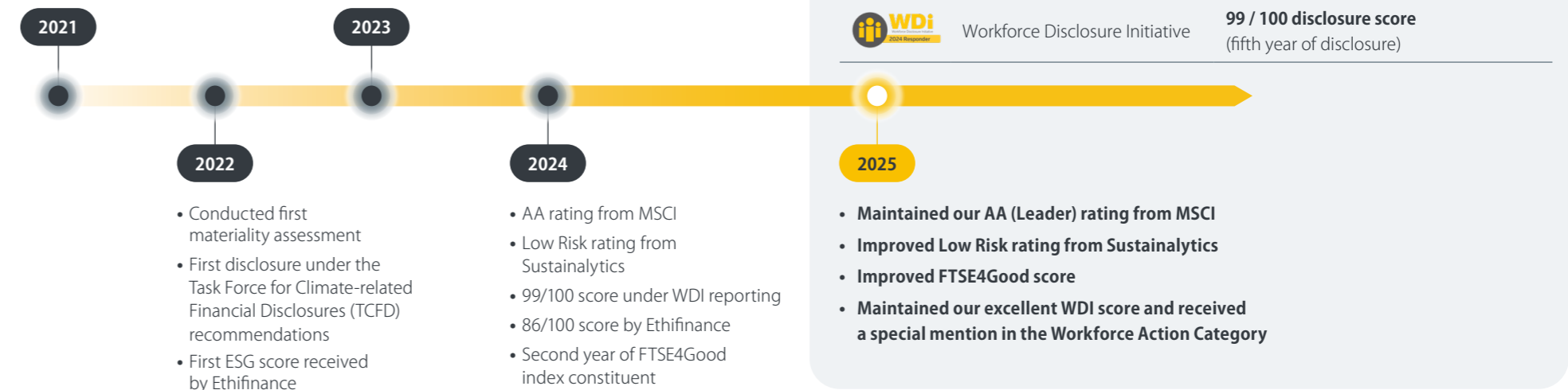
**Project status:**  
 Completed On track In development

## ESG Disclosures and Benchmarking

PensionBee has received recognition across numerous ESG frameworks, rating agencies and indices. We voluntarily submit our ESG data to organisations such as the Sustainability Accounting Standards Board ('SASB') and the Workforce Disclosure Initiative ('WDI') and actively participate in the United Nations Global Compact ('UNGC').

We have also been independently assessed by ESG raters such as MSCI, Sustainalytics, FTSE4Good, ISS and Ethifinance. Over 2025 we maintained or improved our scores.

- Admitted in the FTSE4Good Index as a constituent
- Publicly committed to net zero emissions 2050
- Set a base year for Scope 1,2,3 emissions and set interim (2030) and long term (2050) net zero targets
- Disclosed first Scope 3 Category 15 emissions
- First GRI reporting
- 99/100 under WDI reporting
- A participant of UNGC
- S&P Corporate Sustainability Assessment Global Submitted
- Bloomberg Gender Equality Index published
- First WDI reporting
- First SASB reporting
- First Streamlined Energy & Carbon Reporting (SECR) reporting



Framework / Rater / Index	2025 Score
MSCI ESG Ratings	<b>Leader (AA)</b>
Sustainalytics	<b>Low: 17.6 / 40+</b> (lower scores indicate better practices)
Ethifinance	<b>81 / 100</b> (higher scores indicate better practices)
FTSE4Good	<b>4 / 5</b> (higher scores indicate better practices)
ISS ESG	<b>3 / 10 average across E, S and G score</b> (lower scores indicate better practices)
Sustainability Accounting Standards Board	<b>Fifth year of SASB disclosure under Asset Management &amp; Custody Activities / Software &amp; IT Services industries</b>
Task Force on Climate-related Financial Disclosures	<b>11 / 11 metrics disclosed</b>
United Nations Global Compact	<b>Participant member</b>
Workforce Disclosure Initiative	<b>99 / 100 disclosure score</b> (fifth year of disclosure)

# 4 Customers & Financial Wellbeing

Empowering our Customers and Building Retirement Confidence.

Financial wellbeing is a prerequisite of retirement confidence. When people lack clarity, understanding or trust in their finances, they are far less likely to engage with long-term saving or make informed decisions about their future. This is the starting point for building a pension product that meets the needs of mass market consumers, our target market.

**FCA statistics on financial inclusion and literacy in the UK**

**25%**  
of working-age adults in the UK had a disability in the 2023/24 financial year<sup>1</sup>

**12%**  
6.5 million of UK adults had low financial capability, rating their knowledge of financial matters or confidence in managing money as very low<sup>2</sup>

**33%**  
of adults with a defined contribution pension have less than £10,000 saved for retirement<sup>3</sup>

**12%**  
of DC pension holders don't know how much they have saved in pension pots<sup>4</sup>

<sup>1</sup> <https://commonslibrary.parliament.uk/research-briefings/cbp-9602/>  
<sup>2</sup> <https://www.fca.org.uk/publication/consultation/cp25-39.pdf>

<sup>3</sup> <https://www.fca.org.uk/news/press-releases/more-people-have-bank-accounts-one-ten-have-no-cash-savings>  
<sup>4</sup> <https://www.fca.org.uk/news/press-releases/more-people-have-bank-accounts-one-ten-have-no-cash-savings>

We are committed to supporting our customers' financial wellbeing and accessibility needs at every stage of their pension journey with us. We are also committed to supporting financial inclusion in wider UK society. By reducing complexity and designing experiences that are clear and accessible to all, our aim is to help customers move from uncertainty to confidence, and from disengagement to long-term planning and engagement.

In 2025 we looked closely at how people engage with their pensions and what happens when they don't and we published The £500,000 Cost of Neglecting Your Pension report. Our research, based on data from over 265,000 customers, shows that people who log in five or more times a month hold average pension values of £31,076, compared with £9,614 for those who do not log in regularly, while those who engage with tools like the Pension Calculator hold nearly double the average pension value of non-users (£35,143 compared with £17,768).

Scenario analysis highlights how disengagement compounds over time: remaining in low-performing funds could reduce retirement savings by up to £503,061, contributing only the minimum could cost up to £191,896, and losing track of a £10,000 pot at age 30 could reduce retirement wealth by £23,544 by age 68.

In response, we focus on practical solutions that make engagement easier and more rewarding, from simplifying consolidation and championing faster transfers through the 10-Day Switch Guarantee, to providing intuitive digital tools, clear information and supportive BeeKeeper guidance, helping customers stay connected to their savings, make informed choices, and build stronger financial futures with confidence.

Throughout 2025, we continued to advocate for more efficient pension switching, deliver inclusive user-led digital experiences, provide practical financial education, human support, and champion the needs of groups underrepresented in the pensions system. Together, these efforts support our broader mission: to build retirement confidence so that everyone can enjoy a happy retirement.

“ It was really easy to transfer my pension to PensionBee, the whole process took less time than it did to get to talk to someone at my old provider! I now have control over my money.

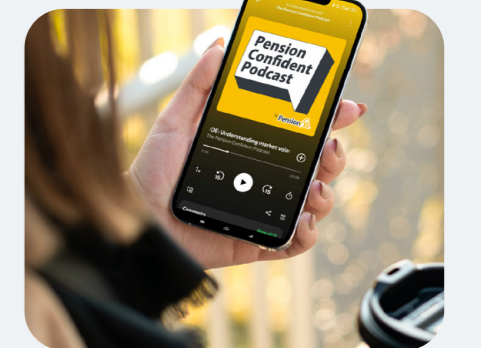
PensionBee Customer, 2025



The Pension Confident Podcast is our award-winning podcast aimed at making pensions and personal finance topics more accessible and understandable. With the help of expert guests and clear, jargon-free discussion, each episode tackles one focused question - covering the basics of how pensions, ISAs and mortgages work, to how you can start to use your money to save for a happy retirement, and broader life and financial planning themes.

In 2025, the most downloaded episode, 'Who wants to be a pension millionaire?', reached 4,816 listeners.

Hosted by journalist Philippa Lamb, and available on all major podcast platforms, YouTube and in the PensionBee app, the podcast has built a strong following by breaking down complex subjects into relatable conversations and answering the questions our customers care about most.



## Making Pension Switching more Efficient

At PensionBee, we are focused on making the pension switching simpler, faster and more efficient, so more people can take control of their retirement savings with confidence. For too long, slow transfers, unclear processes and limited accountability have made moving pensions harder than it needs to be, leaving many savers frustrated, with scattered pensions and little visibility over their money.

### Our research established that:

- **Scale of pension switching:** Around **1.5 million** electronic DC pension transfers, worth approximately £61 billion, were processed in the UK in the 12 months to 30 September 2025, underlining strong consumer demand for switching and consolidation.<sup>5</sup>
- **Consumer experience: 46% of consumers** who have transferred a pension described at least one transfer as difficult, and **63%** believe slow transfers prevent effective retirement savings management.
- **Perceived complexity:** Pension transfers are ranked as the **second most difficult administrative task**, after moving house.

In 2025, we launched our 10-day Pension Switch Guarantee campaign to push for better transfer standards across the industry.<sup>6</sup> Through three published reports, a wide-reaching media campaign, direct engagement with regulators and industry bodies, and a public petition, we worked to raise awareness and drive meaningful change for customers.

Our public petition received 16,700 signatures and we were pleased to have received a response from the government - which recognised the importance of improving efficiency in the pension transfer system while maintaining strong protections for savers, and confirmed that the Department for Work and Pensions is considering operational improvements, including greater use of electronic processes, alongside further work on the 2021 pensions transfer regulations<sup>7</sup>. Faster, more reliable transfers minimise disruption and strengthen trust at a key moment customers' financial journey. This is particularly valuable for people with multiple small pension pots, those who have moved between employers, and individuals returning to pension saving after periods of self-employment or caring responsibilities.

In 2026, we will continue to raise awareness of our 10-day Pension Switch Guarantee campaign. This will involve continued efforts in the media, working more closely with the personal pensions market and with regulators across the pensions landscape, and demonstrating how our campaign fits with proposed FCA policy intervention into DC pension transfers.

<sup>5</sup> <https://origo.com/news-and-press-releases/pension-transfer-times-speed-up-again-ahead-of-autumn-budget>  
<sup>6</sup> <https://www.pensionbee.com/uk/10-day-switch-guarantee>  
<sup>7</sup> <https://petition.parliament.uk/petitions/731994>

### Invisible Workers Campaign

#### Financial Inclusion for the UK's Invisible Workers

In 2025, we ran our **Invisible Workers Campaign**, publishing a series of white papers to highlight the huge challenges faced by those currently underserved by the pensions system. Our research found that more than 1 million gig workers cannot currently afford to save for a pension, that 75% of unpaid carers are not saving into a pension and that women continue to face a 37% pension savings gap as they continue to support loved ones in unpaid caring roles.<sup>8</sup>

We have undertaken significant research to look at the financial impact of career breaks on your retirement outcomes. Our research shows that each year out of paid work for unpaid caring responsibilities reduces retirement savings by approximately £5,000, with cumulative caring responsibilities potentially reducing a pension pot by around £30,000, equivalent to a 13% lower retirement pot. Additionally, 61% of carers report that unpaid care has negatively affected their ability to build pension savings.

We called for fundamental changes to the architecture of the pensions system, to ensure that a portable pot means that retirement saving works for modern careers, across both jobs and life stages.



Alongside our advocacy work, we have designed our retirement product to reflect the realities of modern working life. We help customers consolidate multiple pots and maintain continuity of saving across different employment types and life stages, and we cater for the self-employed who are all too often underserved.

<sup>8</sup> Full data available in The Carer's Pension Gap



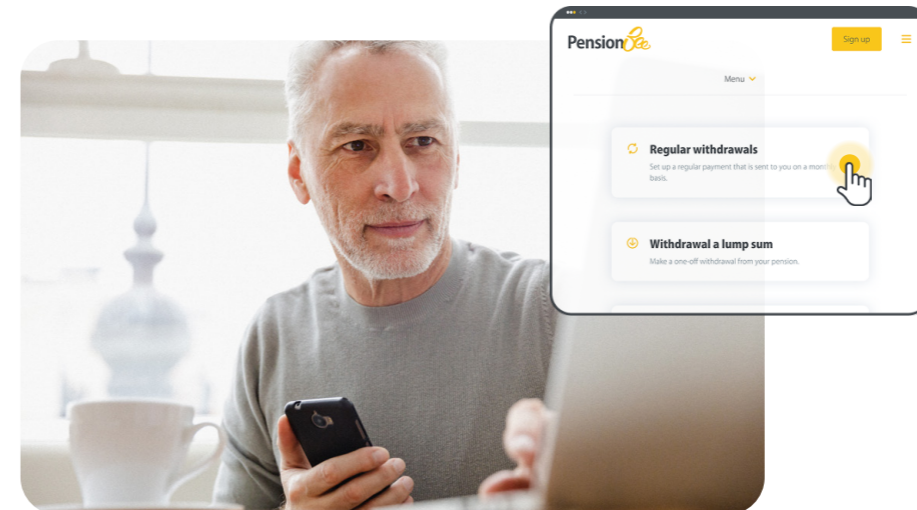
## Enhancing Drawdown with Regular Withdrawals

In 2025, PensionBee improved the way in which our customers can access their retirement savings by launching a new Regular Withdrawals feature as part of our flexible drawdown offering. This enhancement supports our broader mission to build retirement confidence by making managing retirement income simpler, more predictable and more aligned with individual needs.

The Regular Withdrawals feature enables customers aged 55 and over (rising to 57 from 2028) to set up automatic monthly payments directly to their bank accounts. This feature works alongside existing one-off withdrawals, giving customers the choice between taking ad-hoc income and following a more structured, 'set-and-forget' approach.

### This enhancement improves the customer experience in several important ways:

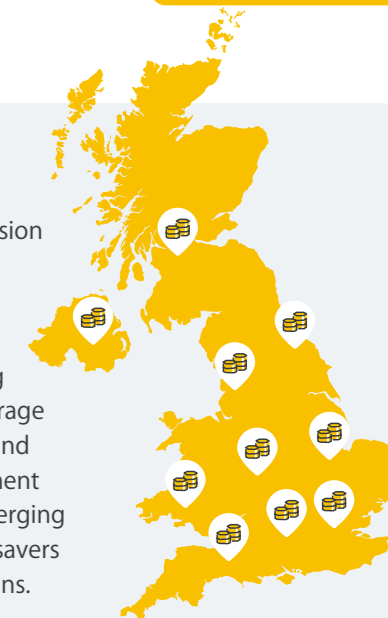
- **Simplified retirement planning:** Regular Withdrawals provide a consistent monthly income stream, helping customers plan their retirement cash flow with greater certainty and less administrative effort.
- **Flexibility:** Customers can switch between regular and one-off withdrawals, allowing them to adjust their retirement income approach as their circumstances evolve.
- **Improved tax management:** Regular Withdrawals can help customers spread income across the tax year, supporting more efficient tax planning and potentially reducing tax liabilities.
- **Sustainability of savings:** A structured monthly approach can support more sustainable usage of retirement savings over time, helping customers balance short-term income needs with long-term financial security.



### The UK Pension Landscape

Since 2020, we have been tracking the UK Pension Landscape to better understand how pension outcomes vary by age, gender, and region, and what we can do to help close those gaps.

Our 2025 research revealed some encouraging signs alongside persistent challenges. The average UK pension pot has grown to £21,875, up around 9% year-on-year, indicating growing engagement with retirement saving. We have also seen emerging interest in values-based investing, with 9% of savers now choosing socially responsible pension plans.



The UK average		Greater London	
£21,875	41%	£23,393	41%
Average pension pot size	Proportion who've contributed	Average pension pot size	Proportion who've contributed

However, significant disparities remain. Regional differences are pronounced, with average pension pots ranging from £32,787 in the South East to £17,855 in Northern Ireland. The gender pension gap persists at around 37% across the UK, with men holding average pension pots of £25,652 compared with £16,169 for women. This gap widens with age: among those over 50, men's average pension pots (£88,444) are around 44% larger than women's (£54,512), highlighting the cumulative impact of pay gaps and

career interruptions. These findings reinforce why we do what we do. We are focused on building retirement confidence by simplifying retirement management and improving accessibility. By making it easier for people to consolidate their pensions, track their savings, and stay engaged throughout their careers, we are helping to support earlier and more sustained engagement with retirement saving, particularly for those most at risk of falling behind.

## Retirement Planner and Planning Tools

PensionBee's retirement planning tools are designed to help customers understand their retirement position, set realistic goals and make informed long-term decisions. By combining personalised forecasts, interactive calculators and plain-language guidance, these tools support our mission to build pension confidence and improve financial wellbeing.

In 2025, our retirement planning hub brought together a suite of digital tools that enable customers to explore different retirement scenarios in one place, including:

### Retirement planning tools



A **Pension Calculator** to estimate future retirement income based on current savings and contributions.



A **Drawdown Calculator** to model flexible retirement income and tax implications.



A **State Pension Age Calculator** to support retirement timing decisions.



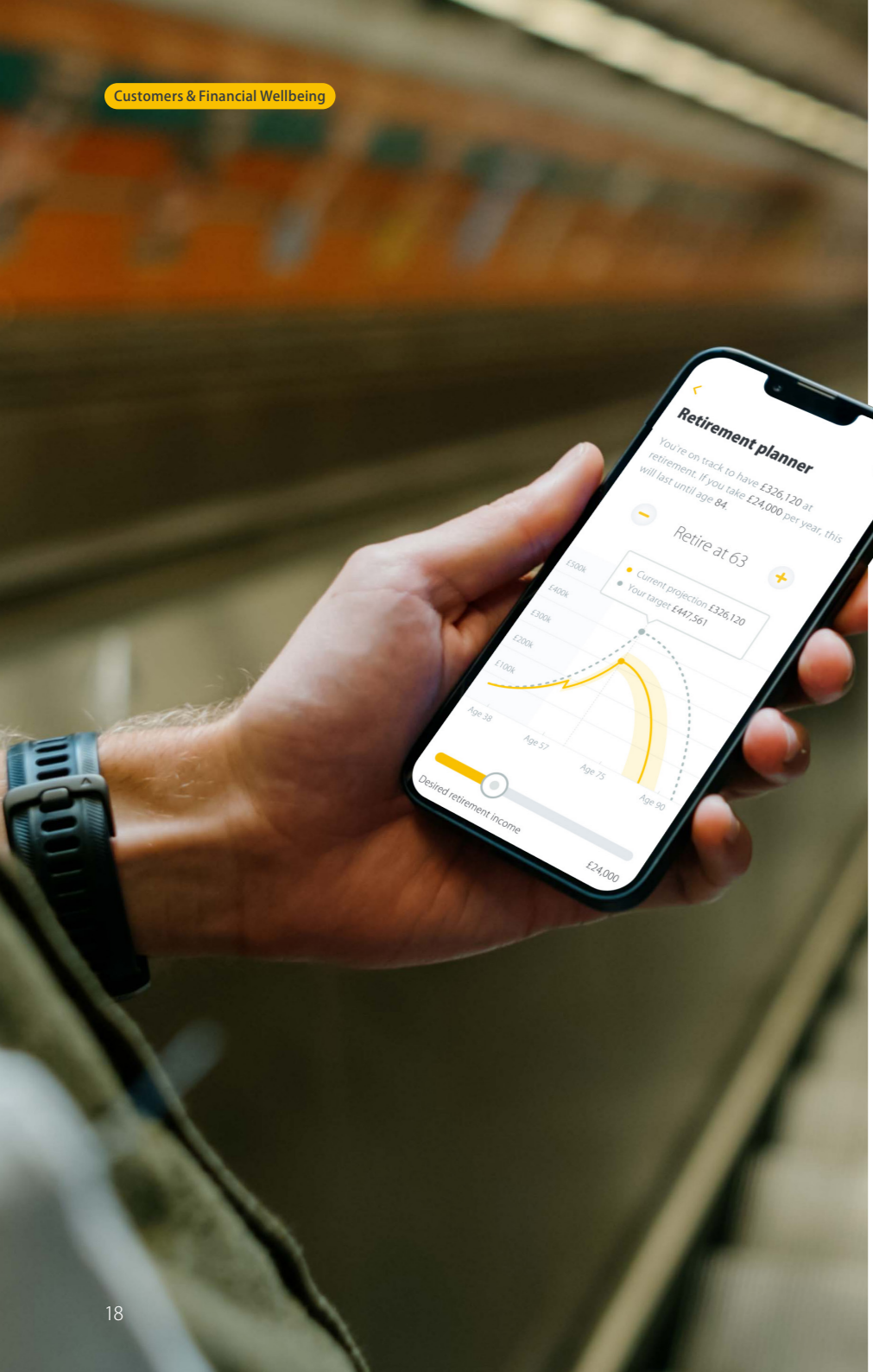
An **Inflation Calculator** to show how rising costs affect long-term savings.



A **Tax Relief Calculator** to demonstrate the value of pension contributions.

These tools allow customers to test assumptions, compare outcomes and understand how changes in saving behaviour can affect future income. Making projections visible and interactive, helps turn abstract long-term goals into practical, actionable plans.

The tools are supported by clear educational content covering withdrawal options, tax considerations and key retirement decisions. Customers are also encouraged to access independent guidance, including Pension Wise, to support informed decision-making alongside digital planning.



“ Brilliantly efficient, clear and easy to understand. I love the control that I have with my PensionBee account. The most important feature is the planner where I can see exactly how much I'll have on retirement and how long it will last. It has completely changed how I feel about my future after work - I'm no longer putting off saving and planning. Thank you!

PensionBee Customer, 2025

# 5 People, Culture & Inclusion

At PensionBee, our vision is a world where everyone can enjoy a happy retirement. This vision, together with our mission to build retirement confidence and our values of **love, quality, innovation, simplicity** and **honesty**, underpins how we support our people and shape our culture.

In particular, our focus on everyone, and our value of love, reflect our desire for both our team and our customers to include those who may not have been previously well represented within the pensions industry. We believe that when these principles are embedded in everything we do, demographic diversity that reflects wider industry and societal benchmarks will follow.

## Our Wellbeing Framework

Supporting the wellbeing of our people is a core part of how we build a sustainable, inclusive culture. Our approach to wellbeing is underpinned by our recently introduced **Six Bees of Wellbeing** framework, which translates our values into practical drivers of day-to-day experience at PensionBee.

In 2025, we introduced a simplified tri-annual Wellbeing Survey to understand how colleagues experience their work, and to inform targeted actions throughout the year. The survey combines four core wellbeing questions - covering satisfaction, purpose, happiness and stress - that help us understand the factors influencing wellbeing across our organisation.

Our September 2025 survey achieved a 59% completion rate, the highest response rate to date, indicating strong engagement with the process. Using the Indeed Work Wellbeing Score methodology<sup>9</sup>, an external employee benchmarking tool, we recorded an overall **Work Wellbeing Score of 79**. According to Indeed's benchmarks, scores of 75 or above fall into the highest tier and are considered excellent.

Scores relating to **purpose (85), job satisfaction (80) and happiness at work (79)** were particularly strong. Stress levels were assessed as broadly in line with benchmarks, reinforcing the importance of continued focus on mental health support.



<sup>9</sup> <https://support.indeed.com/hc/en-gb/articles/12534593709581-Understanding-the-Work-Wellbeing-Score>

## Workforce Composition

By the end of 2025, PensionBee had a total workforce of 219 individuals. For 2025, we achieved 49% female and minority gender representation and 42% male representation across the Company, 50% female representation at Executive Management level and 57% at Board level. The Company satisfied the FCA requirement<sup>10</sup> to have at least 40% women on the Board, with at least one senior board position being held by a woman.

The Company also achieved 36% minority ethnic representation across our Company, 10% at Executive Management level and 14% at Board level. The Company satisfied the FCA requirement for at least one Board member being from a minority background.

There have not been any changes to the composition of the Board in 2025.

Category	Group	Total Workforce (%)	Board Members (%)	Executive Management (%)
Ethnicity	White British or Other White	56%	86%	80%
	Asian or Asian British	14%	0%	10%
	Black, African, Caribbean or Black British	10%	14%	0%
	Mixed or Multiple Ethnic Groups (including Latin/a/o/x)	12%	0%	0%
	Not specified / Prefer not to say	8%	0%	10%
Gender	Women	49%	57%	50%
	Men	45%	43%	40%
	Other categories	-	0%	0%
	Not specified / Prefer not to say	7%	0%	10%

<sup>10</sup> <http://www.fca.org.uk/publication/policy/ps22-3.pdf>

## Gender pay gap

The data is based on 172 full pay relevant employees on the snapshot date of 5 April 2025, in line with government guidance. Non-disclosure rate: 6% (12 people).

We have grouped Senior, VP and Senior VP levels together to protect anonymity of groups with fewer than 10 employees. While there is variation in pay gap outcomes across the individual management levels, these cannot be reported separately due to small population sizes. This combined group includes more male than female employees, particularly at more senior levels. As a result, the overall 11% pay gap reflects structural composition within a small population rather than a consistent trend across all management levels.

This year Executive Team members are grouped at the same management level, whereas previously Executive Team members with a board function were reported separately. Executive Team members with a board function are remunerated at a higher level to reflect the additional scope and accountability of those roles, and there are more male Executives who hold a board function, which affects the pay gap on this level.

Percentage of Men and Women in each Hourly Pay Quarter	Male		Female		Total	Male (%)	Female (%)
	Male	Female	Male	Female			
Upper Hourly Pay Quarter	22	21	43	51	49		
Upper Middle Hourly Pay Quarter	24	19	43	56	44		
Lower Middle Hourly Pay Quarter	20	23	43	47	53		
Lower Hourly Pay Quarter	16	27	43	37	63		

Management Level	Female Average Hourly Pay (£)	Male Average Hourly Pay (£)	Mean Pay Gap
Entry	14.65	14.38	-2%
Junior	17.59	17.17	-2%
Mid level	24.34	24.64	1%
Senior/VP/Senior VP*	36.15	40.57	11%
Executive	101.76	108.48	6%

## Ethnicity pay gap

The data is based on 171 full pay relevant employees on the snapshot date of 5 April 2025, in line with government guidance. Non-disclosure rate: 7% (14 people); we have excluded those who did not disclose their ethnic background/and or answered 'Rather not say' from the dataset. The hourly pay figures include relevant bonus pay.

While there is variation in pay gap outcomes across the individual management levels, these cannot be reported separately due to small population sizes. The overall -12% pay gap is influenced by the distribution of employees and pay levels within one of the smaller management level sub-groups. It reflects structural composition within a small population rather than a consistent trend across all management levels.

This year Executive Team members are grouped at the same management level, whereas previously Executive Team members with a board function were reported separately. Executive Team members with a board function are remunerated at a higher level to reflect the additional scope and accountability of those roles, and there are more white Executives who hold a board function, which affects the pay gap on this level.

Breakdown of White and Minority Ethnic groups in each Hourly Pay Quarter	White	Minority Ethnic	Total	White (%)	Minority Ethnic (%)
Upper Hourly Pay Quarter	30	12	42	71%	29%
Upper Middle Hourly Pay Quarter	23	20	43	53%	47%
Lower Middle Hourly Pay Quarter	29	14	43	67%	33%
Lower Hourly Pay Quarter	25	18	43	58%	42%

Management Level	Minority Ethnic Employees Average Hourly Pay (£)	White Employees Average Hourly Pay (£)	Pay Gap (%)
Entry	14.51	14.54	0
Junior	17.29	17.42	1
Mid level	24.68	24.04	-3
Senior/VP/Senior VP	41.85	37.29	-12
Executive	97.33	105.67	8

## Inclusion, Diversity and Engagement

In 2025, we continued to develop our Hive & Thrive (diversity and inclusion) programme, led by our Executive Management Team, with support from Senior Managers. The purpose is to foster an inclusive culture where colleagues feel able to be themselves, engage in open dialogue and build understanding across differences, strengthening connection and reinforcing an inclusive culture across our global business.

We are now in the fourth year of this programme, which we deliver through a series of themed awareness months, shaped annually by employee feedback and input. Each month involves activities such as 'lived experience' panel discussions with colleagues, and external speakers. Our events are hybrid or virtual, and open to all teams, across all geographies, usually held at a time when everyone can dial in wherever they are in the world.

Key events during the year included:

- Mental Health Awareness Month
- Women's Month
- Age Awareness Month
- Neurodiversity & Disability Month
- LGBTQ+ Awareness Month
- International Month
- South Asian Heritage Month
- Carer's Month
- Black History Month

Alongside our Hive & Thrive programme, we continued to invest in initiatives that strengthen engagement and foster an inclusive workplace where all employees can build fulfilling careers:

- Weekly all-Company Show N Tell meetings with the CEO and Executive Management Team.
- Weekly UK Monday Morning Meeting hosted by the Chief Business Officer UK.
- Regular departmental updates and 'Ask Me Anything' sessions.
- 'Donut!' internal Company-wide networking.
- PensionBee Stingers Football Club.
- Wellbeing book club hosted by the CEO.
- Lunch & Learn sessions, covering topics such as Strategy (Shaping Our Values and Strategic Statements, hosted by the CEO) and Board-led sessions such as the Directors' Remuneration Policy (hosted by the Chair of our Remuneration Committee).
- Monthly 'Buzzworthy' digital newsletters to keep the team updated.
- Bi-monthly 'Happiness!' meetings for employees to discuss their wellbeing with their manager.
- Annual manager feedback survey.
- Anonymous channels for employees to submit any requests, concerns, or issues.
- Qualified Mental Health First Aiders on hand to provide mental health support.

Our Senior Independent Director, Mary Francis CBE, is the director responsible for employee engagement, and we regularly report on our people and culture at both the Board and Committee levels. This focus reflects the importance we place on our culture and the significant role it plays in driving our strategy and our success.

## Disability Confident Employer

We've been a Disability Confident Employer (Level 2)<sup>11</sup> as part of the government's Disability Confident Employer Scheme since 2023. We are committed to employing people from the widest pool of talent, securing skilled staff from diverse backgrounds and providing guidance for managers supporting employees who are neurodiverse and/or have disabilities.

## Diversity Awards

In 2025, we were proud to have achieved recognition for our focus and achievements in diversity in the FTAdviser Diversity in Finance Awards:

- Winner of the 'Trailblazing Company of the Year'
- Shortlisted as 'Employer of the Year (small company)'.

## Learning, Development and Progression

At PensionBee, we recognise that investing in learning and development is critical to building a sustainable organisation and retaining skilled, motivated colleagues. We place strong emphasis on **internal career progression**, supporting our people to develop new skills, broaden their experience and progress into more senior or specialist roles over time.

Our approach focuses on creating **clear development pathways**, particularly within operational and customer-facing teams, to ensure colleagues understand how they can grow their careers at PensionBee. As the business evolves, we aim to balance operational resilience with meaningful development opportunities, enabling individuals to take on greater responsibility while continuing to contribute to our core purpose.

Key elements of our learning and development approach include:

- Structured onboarding and training when colleagues move into more advanced roles within the department.
- Ongoing development in both technical capability and soft skills, such as communication, problem-solving and collaboration.
- Access to our Bee Connected! Mentoring Programme, supporting knowledge-sharing and career development.
- Regular career conversations to help colleagues set goals and work towards progression that aligns with their interests and strengths.

<sup>11</sup> <http://www.pensionbee.com/press/pensionbee-becomes-a-disability-confident-employer>

We also support managers and team leaders to play an active role in development, recognising that effective coaching and feedback are central to building confidence, capability and engagement across teams.

By prioritising internal progression and targeted development, we aim to strengthen retention, build future leadership capability and ensure our people are equipped to support PensionBee's long-term growth.

## Remuneration

PensionBee has an established Remuneration Policy providing clear and guiding principles for decisions around employee remuneration that ensures fair, competitive and appropriate pay for all. Our goal is to maintain a mix and balance of remuneration that is appropriate to attract, motivate, retain and fairly reward employees whilst balancing the needs of our business and customers.

### Components of Employee Remuneration

- Base Cash Salary**
  - We are an Accredited Living Wage Employer and everyone at PensionBee is paid at least a Living Wage.
  - We aim to set base cash salaries at a level that enables us to attract and retain the people that we need to thrive, whilst balancing our financial resources as a company.
  - The primary driver for our base cash salary levels is external benchmarking.
- Equity Schemes**
  - The purpose of granting equity is to encourage employees to think and behave like owners, and to recognise the vital contribution our team makes towards achieving our mission and vision.
  - Prior to becoming a listed company, PensionBee operated an EMI and non-EMI option Scheme for all employees, which fully vested in 2025. Post-listing, we have operated the Omnibus Plan, granting long-term incentives and a deferred bonus.

- End of Year Bonus**
  - The individual bonus structure contains set and discretionary elements with good performers receiving amounts, starting at approximately 5% of salary.
  - The proportion of the bonus based on Company vs. individual performance varies across all levels, with the Company proportion accounting for more at senior levels where individual performance is more directly reflected in Company performance.
  - The Company proportion of the bonus is deferred and paid with equity in the form of nil-cost options. The individual performance-based bonus is paid entirely in cash, except for at senior levels, where a portion is paid in equity to encourage long-term engagement with our vision, mission and values.
  - Executive Management Team Company bonuses include metrics that incentivise collective focus toward helping customers achieve good outcomes over the long-term, such as Trustpilot scores, app ratings, NPS and complaints ratios.
  - Executive Management Team Individual bonuses include a values-based competency matrix, comprising quantitative and qualitative measures. This includes delivery of operational performance, strategic initiatives and risk management controls but also achievements with respect to furthering the Company's culture which includes the approach to inclusion, equality and diversity.

- Pension Scheme**
  - UK employees who meet the automatic enrolment criteria set out by the Government are enrolled into the PensionBee Personal Pension, within 6 weeks of their employment start date.
  - PensionBee contributes an amount equivalent to 5% (which is matched by the employee) of qualifying earnings as part of monthly compensation.

- Other Benefits for 2025**
  - Income Protection Insurance.
  - Pension Salary Sacrifice.
  - UK HealthCare Cash Plan.
  - Bupa Medical Cover and Dental Cover.
  - Thrive Mental Wellbeing platform.
  - SmartHealth GP online.
  - Enjoy Benefits platform, offering a range of benefits.
  - [Childcare Benefits](#).

## Volunteering and Community Engagement

Each member of the PensionBee team can dedicate the equivalent of a full day of work, each year, to volunteer for a cause that is related to PensionBee. Our approach to working with charities and our local communities is outlined in our [Community Involvement Policy](#), available on our website.

During 2025, PensionBee colleagues supported a range of volunteering and community engagement initiatives, including:

- Continued sponsorship of [Wiltshire Cricket's Girls Talent Pathway](#) and [Bristol Bees](#), supporting access to sport for young people through an ongoing partnership.
- Contribution to the [House of Lords Home-Based Working Committee](#), through the ABI's Flexible Working Charter, providing evidence to support flexible and remote working practices.
- Participation in [Bankside Futures](#): The Big Buzz Meet, supporting young people in Southwark to develop employability skills, confidence and professional networks.
- An Operations Volunteering Day with the Educational and Environmental Charity [Roots and Shoots](#), supporting vocational training for young people with special needs through hands-on volunteering.

Together, these initiatives reflect our commitment to using our time and expertise to support inclusive opportunity, social mobility and community engagement.



# 6 Stewardship & Active Ownership

We take our role as active asset owner very seriously. As stewards of billions of pounds of our customers' retirement savings, we act with integrity and transparency in every decision we make on their behalf and always in their long-term interests.

## Our Role as an Active Asset Owner

For us, that process starts with understanding our customers' views and preferences from the outset, to inform where and how we should act, and when to speak up and challenge corporate behaviour.

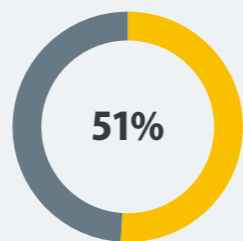
In a highly complex financial system, with many different parties in the value chain, the views of retirement savers, as shareholders, are rarely heard. This is a failing of the system, that in part comes about due to the structure of pooled funds and indexing, features that are commonplace in pensions.

Our approach to this has always been customer-led stewardship. The way we have executed this has evolved over time, but the foundation has stayed the same. Annual surveys, interviews and case studies as the starting point. We take time to understand what our customers want and need from us, then translate that into action in our investment range, our approach to voting, and wider campaigning work, including national media.

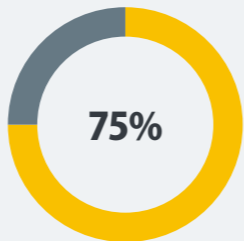
**In 2025, we asked customers in our Climate Plan what role they thought PensionBee should play in influencing companies and driving change in the companies they invest in...**



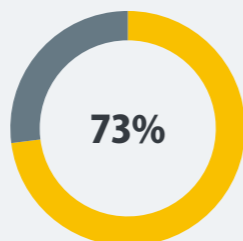
### Climate Plan customer survey



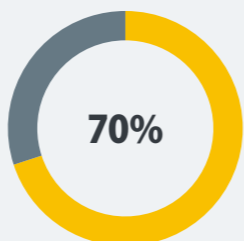
of respondents told us they want us to use press and media to raise awareness to drive positive action.



of respondents told us they wanted us to vote for shareholder resolutions that drive positive change.



of respondents told us they want to see us work with investor coalitions for greater impact.



of respondents told us they want us to vote against directors when accountability or progress is lacking.

## Engaging with our Customers

Our customers tell us they see PensionBee as a positive voice and trusted player in the investment landscape - championing their long-term interests, challenging the status quo and fighting for them in the retirement system. Many of our customers joined us for this reason.

They are also pleased to see us challenge the companies in their investment plan that do not behave in a way that aligns with that approach. They recognise the importance of collective power and influence to drive positive change, to increase long-term value for all pensions - and retirees - through sustainable business practices.

At PensionBee customers are invited to share their views on investments and voting annually, through online surveys. In our surveys from 2020, 2021, 2022, 2023, 2024 and 2025, our customers have told us that they believe strong environmental and social practices contribute to long-term financial outcomes in the companies where their savings are invested. In addition to our specific questions, we always receive a large volume of comments, on a range of topics. We read them all, as it guides our longer-term thinking and enables us to identify trends over time.

In our 2025 surveys, customers again highlighted the importance of climate action, fair pay, human rights and responsible technology in supporting sustainable value creation for their pensions in the decades to come.

These themes help us to contribute to collective engagement on systemic issues that may affect long-term investment performance, in a way that is proportionate to our role.

Where progress is limited or lacking transparency, we may seek enhanced dialogue with engagement teams of our money managers, or work directly with ISS, our proxy vote service. In all cases, we would encourage escalation before voting, to ensure shareholder views are fully understood by management. We hold our money managers to account in respect of their role in the value chain. We also are clear that we expect them to report on their engagement activities and the outcomes achieved in any given year.

## Voting Record

Voting is a key mechanism for shareholders to have a say on how companies are run and how they manage important ESG issues that may affect long-term performance.

Historically, we shared the views of our customers with our money managers, who used direct engagement before AGMs where appropriate. As PensionBee invests via pooled funds, our money managers used block votes across their assets, as there was no option to 'vote split' or vote differently from them. We were concerned that manager voting was not fully aligned with the views of our customers, particularly in respect of shareholder resolutions on workforce issues.

We campaigned publicly and privately for many years to split our votes from those of the money managers. Finally, from 2023 onwards we were given the ability to vote in line with our customers' views, using 'Voting Choice'. In 2025, Voting Choice is now active in four PensionBee plans: the Global Leaders Plan; the 4Plus Plan; the Tracker Plan and the Climate Plan, which together represent approximately 95% of our asset base.

For Voting Choice, PensionBee has selected the ISS' Socially Responsible Investment (SRI) proxy voting policy, as it best represents the views of our customer base in the plans where it is active.

The SRI policy outlines the minimum steps needed for a company for climate risk mitigation, and to be considered to be aligned with a Net Zero by 2050 trajectory. They also require that the company declare a target of Net Zero by 2050 or sooner and the target includes scope 1, 2, and relevant scope 3 emissions.

For companies that are significant (GHG) emitters, through their operations or value chain, the SRI policy will generally vote against or withhold from the incumbent board chair of the responsible committee (or other directors on a case-by-case basis) in cases it is determined that the company is not taking the minimum steps needed to be aligned with a Net Zero by 2050 trajectory.

### In addition, the policy will generally vote in favour of companies with:

- Strong governance;
- Credible climate strategies;
- Robust disclosure;
- Fair capital structure.

### It may consider votes against boards (or other directors on a case-by-case basis) on proposals that:

- Weaken accountability;
- Limit the voting rights of equal shareholders;
- Fail to adequately manage or mitigate environmental, social or governance risks.

Each year, as part of our survey questions, we seek the views of customers to ensure that the ISS SRI policy continues to reflect their evolving interests and expectations. One way we do this is to ask for their voting preferences on historic high-profile shareholder resolutions, to ensure that there continues to be a match between the way the ISS SRI Policy votes, as outlined above, and the vote expectations of our customers in this area.

Stewardship & Active Ownership

In 2025, customers again showed strong support for shareholder proposals focused on real living wages, AI misinformation and governance, antimicrobial resistance and public health, and disclosure of the environmental impact of AI operations. Votes were cast in favour of these proposals where they were consistent with fund mandates and voting frameworks.<sup>12</sup>

Shareholder proposal theme	Company	PensionBee customers' support	PensionBee vote	Management vote
Paying a real living wage to all workers	Amazon.com Inc	<b>86.5%</b> want Amazon to ensure all workers receive a real living wage and report on wages, human rights and inequality.	In favour	Against
AI misinformation & disinformation	Meta Platforms (Facebook)	<b>91.3%</b> want Meta to assess and report on the risks of generative AI, including misinformation and broader societal harms.	In favour	Against
Antimicrobial resistance and its risks to public health	McDonald's Corp	<b>91.2%</b> back a proposal for McDonald's to reduce antibiotic use in its meat supply chain to tackle antimicrobial resistance (AMR).	In favour	Against
AI's environmental impact	Alphabet Inc (Google) & Microsoft Corp	<b>80.9%</b> support asking both companies to disclose the environmental footprint of their AI operations and data centres (energy use, emissions, environmental risks).	In favour	Against

We publish an annual PensionBee Voting Choice Report, where we summarise the survey results, arrange our customers' views by thematic area, and then demonstrate how our ISS SRI voting policy has voted in line with these views. You can find our Voting and other ESG reports in our ESG document hub.

At present time the ISS SRI voting policy continues to offer most alignment with the view of our customers, but this is reviewed annually and subject to change.

<sup>12</sup> Full data available in [PensionBee Engagement & Voting Choice Report 2025](#).

## Partnerships

We know that our customers' voices and votes are stronger and louder in collaboration with others. Over the years we have worked in partnership with other institutional investors and coalitions, to have a more significant, unified voice on the issues of most importance to our customers.

In 2025, we participated as active members in investor coalitions around different thematic areas. We do this to amplify the voices of our customers in a fragmented financial system, and to drive up higher levels of corporate accountability for all retirement savers. We know our collective voice has more impact when speaking out with others on the same issue, and when we present a united front in company engagements.

**We continued to be active members of the following coalitions:**

- **ShareAction's [Good Work Coalition](#)**  
Working with other institutional investors to promote fair pay, secure work and improved workforce standards. As an accredited Living Wage Employer, PensionBee campaigns alongside other Living Wage Employers to ask FTSE 100 Companies to pay their employees a wage that reflects the true cost of living in the UK through which we collaborate with other institutional investors to promote fair pay, secure work and stronger workforce standards.

During 2025, we supported and engaged on shareholder resolutions at major UK retailers, calling for improved workforce data disclosure, greater pay transparency and clearer pathways towards paying at least the real Living Wage to all workforce. As an accredited Living Wage Employer, PensionBee campaigns alongside other Living Wage Employers to ask FTSE 100 Companies to pay their employees a wage that reflects the true cost of living in the UK.

- **ShareAction's [Long-term Investors in People's Health initiative](#)**  
Supporting engagement on nutrition, food systems and antimicrobial resistance. Health is of increasing concern to our customer base. Anti-microbial resistance and mis-categorisation of food products as 'nutritious' by international food and beverage retailers, are two areas we've engaged with customers directly on. Working with other institutional investors to help shape the future of investment and public health.

In 2025, we re-engaged with major UK supermarkets as their existing health targets came to an end last year. Coalition engagement also contributed to Nestlé committing to transparently report on the healthiness of its sales using government-approved nutrient profiling metrics. Health is of increasing concern to our customer base. Anti-microbial resistance and mis-categorisation of food products as 'nutritious' by international food and beverage retailers, are two areas we have engaged with customers directly on.

- **[Workforce Disclosure Initiative](#)**  
Focused on encouraging greater transparency on workforce practices and supply chain standards. We are proud to have received the maximum possible disclosure score of 99% for three years running.

We won the Best Overall Disclosure Score and the Contingent Workforce Data Award at the WDI Workforce Transparency Awards 2024; and we received a special mention in the Workforce Action Category as part of the 2025 WDI Workforce Transparency Awards.

## 2026 Stewardship Priorities

We intend to further strengthen our understanding of customer views around voting and investments in 2026. This will involve inviting the whole UK customer base to share their views on the way their plan votes and how they would like to see the exclusionary screening approach of their plan evolve over time.

We will also invite their views on what action they would like to see us take in relation to corporate governance, in pursuit of more sustainable long-term returns in the companies they are shareholders of. We will do this on a plan-by-plan basis to ensure that our voting policy aligns with the views of each set of plan customers.

In addition to customer surveying, we will also invite customers to participate in interviews. Historically, we have also run thematic focus groups for customers around key issues - something we will offer subject to demand.



# 7 Planet & Climate Action

Climate change presents both material financial risks and opportunities for long-term investors.

For PensionBee, these risks are directly linked to the retirement outcomes of our customers. We are acutely aware that capital allocated today will influence the stability, resilience, and sustainability of the economy our customers retire into.

As a pension provider with a long-term investment horizon, we believe that managing climate-related risks and supporting the transition to a low-carbon economy are integral to protecting the long-term value of our customers' pensions and our own business.

We recognise that climate change, nature loss, resource use, and economic activity are interconnected, and that effective action requires coordination across financial markets, businesses, and policymakers.

As a digital-first business, our direct operational footprint is limited. As you will see in our Task Force on Climate-related Financial Disclosures (TCFD) reporting this year, 98% of our emissions came from our investment activities. Therefore, this is where we focus our efforts, as it is where the impact of our influence is greatest. We exert our influence through plan selection, exclusionary screening, our stewardship work, and via engagement with our money managers.

We are committed to supporting an orderly transition to a low-carbon economy in a way that seeks to protect and enhance long-term outcomes for our customers. We recognise that climate risk management is an evolving area. Our approach continues to develop as data availability, methodologies, and regulatory expectations progress.

## Climate Plan

PensionBee's [Climate Plan](#) is our dedicated Paris-aligned investing option for customers who want their retirement savings to decarbonise over time.

This plan was launched in response to [feedback from our customers](#), who told us they wanted to go further than simply excluding the fossil fuel producers. Our customers told us they wanted to see action on climate change, including decarbonisation pathways and increased investment in green and clean energy over time.

In 2024, we worked with State Street to design and launch our customised Climate Plan, using a set of bespoke exclusionary screens as requested by our customers. This plan goes further than just excluding fossil fuel producers and companies with significant ties to the industry, it follows a [Paris-Aligned Benchmark](#) with a forward-looking decarbonisation pathway.

**The Climate Plan is designed to exceed the minimum standards of an EU Paris-Aligned Benchmark, and seeks to achieve a 10% annual reduction in total carbon emissions. It can do this in two ways:**

1. The companies in the plan reduce their carbon emissions intensity relative to the previous year; or
2. By changing the companies the plan invests in, so that total emissions are reduced over time.

One feature of the Climate Plan is that it can take advantage of the growing opportunities in the shift towards a low-carbon economy, such as by increasing investments in environmentally friendly businesses. This approach also helps protect against risks by avoiding industries and assets that might lose value if the transition to a low-carbon future doesn't go smoothly. Stranded assets are investments that could become almost worthless due to new government regulations, changing public opinions, or shifting consumer preferences.

The Climate Plan is another example of how we've responded to our customers, to give them a way to align their pensions with their values while maintaining a focus on strong long-term financial outcomes.



## Regulatory Disclosures

We disclose our energy use and greenhouse gas emissions in accordance with the UK Streamlined Energy and Carbon Reporting (SECR) requirements. Further details are available in our [Annual Report and Financial Statements 2025](#).

PensionBee also reports in line with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).

The following section sets out our TCFD disclosures across governance, strategy, risk management, and metrics and targets, explaining how climate considerations are embedded within our business oversight and investment approach.

## Task Force on Climate-related Financial Disclosures

We are pleased to present our fourth year of the TCFD. We have continued to apply a proportionate and appropriate approach to TCFD, assessing the reasonableness of the TCFD Implementation Guidance (2021) with respect to the Company's size, business model and continuing constraints of data coverage.

Given our online business model and limited direct carbon footprint, we are an emission-light company with respect to Scope 1 and Scope 2 emissions, as outlined our SECR reporting.

Each year we seek to expand the scope of our emissions reporting. We are pleased to have continued to expand our disclosure this year, to include additional categories of Scope 3 operational emissions that are material to the Company.

**In accordance with Paragraph 8(a) of UK Listing Rule 6.6.6R, all of the disclosures presented here are consistent with the TCFD Implementation Guidance (2021) to the extent described in the table below:**



With respect to our long-term ambitions, PensionBee is committed to achieving net zero emissions across the entire business by 2050. This commitment is applicable to all direct (Scope 1) and indirect (Scope 2) operational emissions, as well as financed emissions<sup>13</sup> from our wider value chain (Scope 3).

As a result of calculating our base year emissions, we were able to set near-term (interim) targets for 2030 and long-term ('net zero') targets for 2050, last year. These targets are detailed as part of our 2025 disclosure below. We continue to commit to these science-based targets in line with the 1.5°C goals of the Paris Agreement.<sup>14</sup>

<sup>13</sup> Category 15, financed emissions, make up more than 98% of our Scope 3 emissions.  
<sup>14</sup> The Paris Agreement is a legally binding international treaty that aims to reduce greenhouse gas emissions and limit global warming. It was adopted in 2015 at the UN Climate Change Conference (COP21) in Paris, France, and entered into force in November 2016. Its overarching goal is to hold 'the increase in the global average temperature to well below 2°C above pre-industrial levels' and pursue efforts 'to limit the temperature increase to 1.5°C above pre-industrial levels.'

Planet & Climate Action

Governance	Reference	Consistency
<p><b>Describe the Board’s oversight of climate-related risks and opportunities:</b></p> <ul style="list-style-type: none"> <li>Our Board has the ultimate responsibility for Climate Risk, which is a Principal Risk. The Board takes responsibility for the approval of PensionBee’s approach in relation to climate-related investment matters.</li> <li>The Board monitors progress against climate targets through the Audit and Risk Committee, as part of the Climate Change Governance Framework.</li> </ul>	<p>Page 35 Section 1.1</p>	
<p><b>Describe management’s role in assessing and managing climate-related risks and opportunities:</b></p> <ul style="list-style-type: none"> <li>PensionBee’s culture is one of our most fundamental tools for effective risk management. Our management promotes risk awareness, transparency and accountability, and places a strong emphasis on the timely identification, escalation and reporting of risks.</li> <li>We have outlined management’s role in assessing and managing climate-related risks through our risk management framework, which is described in the Managing our Risks section of the Strategic Report.</li> </ul>	<p>Page 36 Section 1.2 Please see the Managing our Risks section of the <a href="#">Annual Report</a>.</p>	
Strategy	Reference	Consistency
<p><b>Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long-term:</b></p> <ul style="list-style-type: none"> <li>Climate-related risks and opportunities identified over the short, medium and long-term have been described, considering scenario analysis across three different timeframes and impacts.</li> </ul>	<p>Page 36 Section 2.1</p>	
<p><b>Describe the impact of climate-related risks and opportunities on the organisation’s businesses, strategy, and financial planning:</b></p> <ul style="list-style-type: none"> <li>Minimising Climate Liability Risk in our investment portfolio is a priority for our business and our customers.</li> <li>We see significant opportunities to address the challenges of climate change through our plan range and to being recognised as a leader in this field, such as through our Paris-aligned Climate Plan.</li> <li>We have outlined plans to support the transition to a low carbon economy.</li> </ul>	<p>Page 38 Section 2.2</p>	
<p><b>Describe the resilience of the organisation’s strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario:</b></p> <ul style="list-style-type: none"> <li>We have described how resilient our strategies are to climate-related risk and opportunities under different climate-related scenarios: orderly, disorderly and failed transition. We have also described the quantitative as well as qualitative impact to our revenue as a result of these different transition scenarios.</li> </ul>	<p>Page 39 Section 2.3</p>	
Risk Management	Reference	Consistency
<p><b>Describe the organisation’s processes for identifying and assessing climate-related risks:</b></p> <ul style="list-style-type: none"> <li>Climate Risk drivers can be grouped into categories of sub-risks relevant to PensionBee:                             <ul style="list-style-type: none"> <li>Climate Business Continuity Risk</li> <li>Climate Compliance Risk</li> <li>Climate Liability Risk</li> <li>Climate Third Party Supplier Risk</li> </ul> </li> <li>We have described our processes for identifying and assessing climate-related risk, which are set out in our disclosure and the Managing our Risks section of the Strategic Report.</li> </ul>	<p>Page 42 Section 3.1  Please see the Managing our Risks section of the <a href="#">Annual Report</a>.</p>	

Planet & Climate Action

<p><b>Describe the organisation’s processes for managing climate-related risks:</b></p> <ul style="list-style-type: none"> <li>Climate Risk management is a part of our comprehensive risk management framework, ensuring adequate identification, management and communication of climate risks as they arise, so that decisions can be made on a timely basis.</li> <li>We have described our processes for managing climate-related risk, which are set out in our disclosure and the Managing our Risks section of the Strategic Report.</li> </ul>	<p>Page 42 Section 3.2</p>	
<p><b>Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation’s overall risk management:</b></p> <ul style="list-style-type: none"> <li>We have described how our processes for identifying, assessing, and managing climate-related risks are integrated into our overall risk management framework.</li> </ul>	<p>Page 42 Section 3.3 Please see the Managing our Risks section of the <a href="#">Annual Report</a>.</p>	
Metrics & Targets	Reference	Consistency
<p><b>Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process:</b></p> <ul style="list-style-type: none"> <li>PensionBee tracks a number of metrics in order to measure and manage exposure to climate-related risks and opportunities.</li> <li>These currently include energy and emissions as part of our SECR reporting obligations, our TCFD reporting and our public commitment to achieve net zero emissions by 2050.</li> <li>The range of portfolio metrics (and units) we used for reporting in 2025 were:                             <ul style="list-style-type: none"> <li>Weighted Average Carbon Intensity (“WACI”) (tonnes CO<sub>2</sub>e per \$m Revenue)</li> <li>Carbon Footprint (tCO<sub>2</sub>e / \$m Invested)</li> <li>Carbon Intensity (tonnes CO<sub>2</sub>e per \$m Invested)</li> <li>Absolute Carbon Emissions (Scope 1 and 2) (tonnes CO<sub>2</sub>e)</li> </ul> </li> </ul>	<p>Page 42 Section 4.1</p>	
<p><b>Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (“GHG”) emissions, and the related risks:</b></p> <ul style="list-style-type: none"> <li>We have disclosed Scope 1 and Scope 2 GHG emissions for 2025 as per our SECR obligations.</li> <li>We have disclosed our Scope 3 Category 15 financed emissions for 2024, as this data is available with a one-year delay from our money managers.</li> <li>We have expanded our Scope 3 disclosure to include Categories 1, 3, 5, 6, 7, and 11, Use of Sold Products, which measures our app usage.</li> </ul>	<p>Page 43 Section 4.2</p>	
<p><b>Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets:</b></p> <ul style="list-style-type: none"> <li>We have committed to long-term climate action. We will now report progress against targets for the management of climate-related risks and opportunities.</li> <li>We are committed to ensuring that we use the most up to date and relevant calculation methodologies as climate science for our sector, as it evolves. Our metrics are reviewed regularly as part of our Target Review Process, which is overseen by the Board.</li> </ul>	<p>Page 44 Section 4.3</p>	

## 1. Governance

### Climate Change Governance Framework

PensionBee has made a public commitment to achieve net zero emissions across the entire business by 2050. This commitment is applicable to all direct (Scope 1) and indirect (Scope 2) operational emissions, as well as material emissions from our wider value chain (Scope 3).

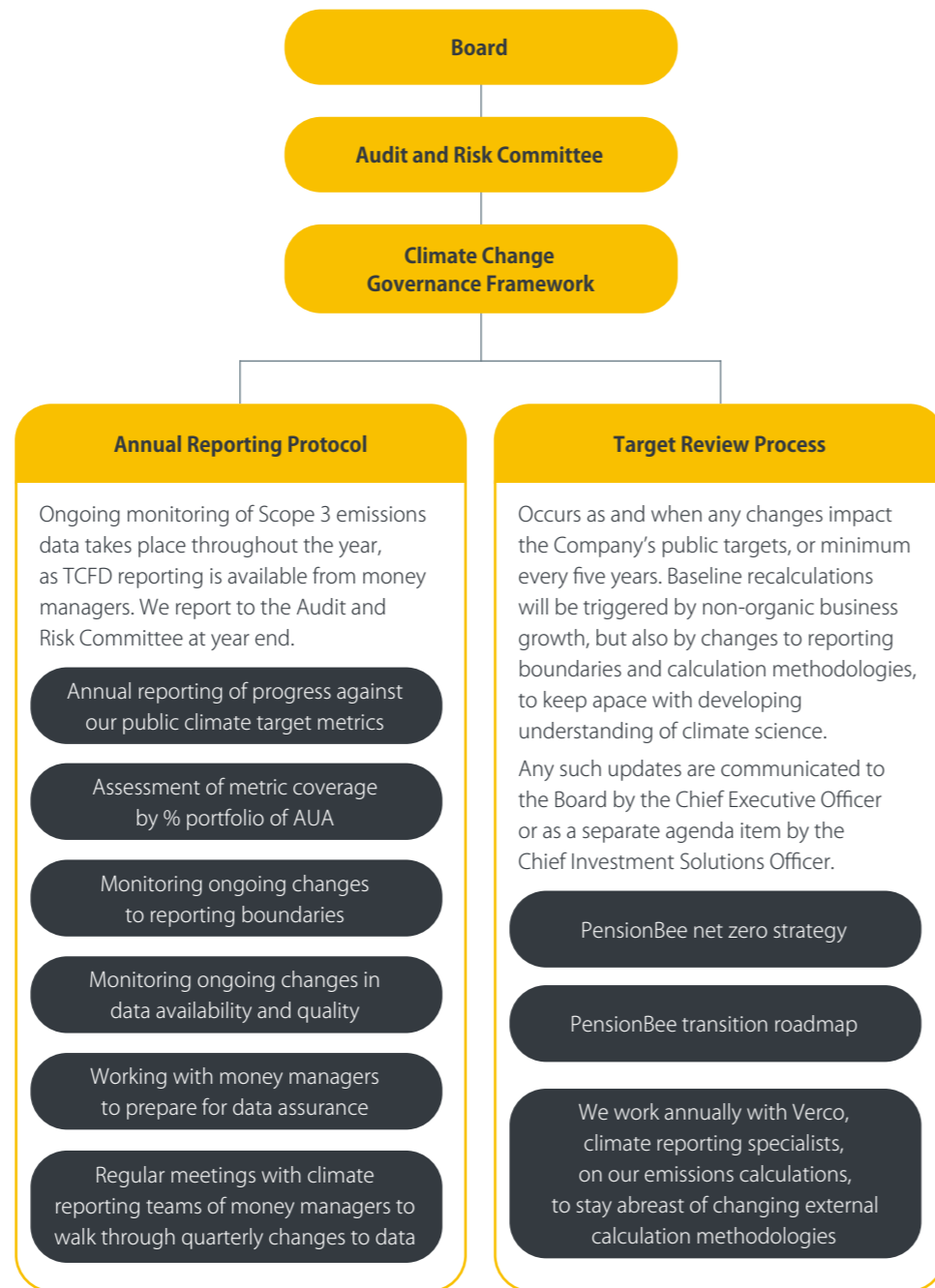
Annual progress towards this commitment is monitored and overseen by the Board and reported on an ongoing basis as and where required. Day-to-day accountability for climate matters is delegated to Executive Management, including the Chief Executive Officer ('CEO'), who is supported by the Chief Investment Solutions Officer ('CISO'), Chief Financial Officer ('CFO') and the Risk Team in discharging this responsibility.

Governance of sustainability issues, including climate-related risks and opportunities, is covered by the Board and Audit and Risk Committee as outlined below.

### Ownership of Climate-related Metrics and Targets Governance

The Investment and Sustainability Team, led by the CISO, owns the Climate Change Governance Framework, comprising the Annual Reporting Protocol and the Target Review Process.

The Board delegates responsibility for oversight of our Annual Reporting Protocol and Target Review Process to the Audit and Risk Committee ('ARC').



## 1.1 Our Board

Our Board has the ultimate responsibility for Climate Risk, which is a Principal Risk. The Board takes responsibility for the approval of PensionBee's approach in relation to climate-related investment matters.

### Process by which Board and Committees are informed about Climate-related Issues

The Board delegates day-to-day oversight of sustainability matters and ongoing progress against goals and targets for addressing climate-related issues, also known as the Annual Reporting Protocol, to its sub-committee, the ARC. The ARC meets at least seven times a year and has ad hoc meetings as and when required.

In 2025, matters related to climate, sustainability and the reporting of progress against our public targets took place at the Board and at the ARC.

### Audit and Risk Committee

The ARC manages the Company's Principal Risks, including Climate Risk. It oversees mandatory climate-related reporting (currently TCFD and SECR disclosures) and monitors annual reporting against public net zero targets.

The Board delegates responsibility to the ARC to provide a rigorous challenge to Executive Management on progress against goals and targets under the Annual Reporting Protocol.

The CISO formally reports back on progress against public targets to the ARC on an annual basis, in line with the Annual Reporting Protocol. In addition, ad hoc reporting analysis can take place throughout the year to cover any ongoing changes to data quality, data availability, metric coverage or the reporting boundary. The purpose of this ad hoc reporting is to act as an early warning system for any changes to data or reporting that may impact our ability to meet an existing target.

The ARC also oversees the delivery of PensionBee's Target Review Process. This is the system by which we review baseline and metric choices as the business and market evolves. This includes changes to the boundary or calculation methods that can impact a target as well as oversight over the fund range and our money managers.

PensionBee's Target Review Process monitors our money managers and investment plans, data quality and availability of Scope 3 emissions, as well as climate science, sector ambition and calculation methodologies. [Any material changes that impact the Company's target or trigger a recalculation of the baseline would be reported by the ARC, directly to the Board.

The CFO, a management co-sponsor of the ARC, is responsible for production of the Group’s financial statements, including climate-related market risks connected to our investments.

The Risk Team is responsible for the Company’s risk management, including oversight of its risk identification and mitigation activities, implementation of the risk management framework, and reporting on the risk assessments against Board’s risk appetite.

All Board members are invited to the ARC; however, the Chair of the ARC may also request a private meeting with the second line of defence (the Risk Management Team) or external assurance providers (independent third parties). For more information on our lines of defence, refer to the Managing our Risks section of the Strategic Report within the [Annual Report and Financial Statements 2025](#).

**Maintaining and enhancing climate competence**

The CISO is the owner of Climate Risk, and oversees all climate-related reporting, asset stewardship and related activities. The CRO has extensive risk management experience managing across all risks, including Climate Risk and is responsible for risk oversight.

There are two dedicated team members who report directly to the CISO. The Head of Sustainability leads on all our sustainability initiatives, including our customer-led approach to voting, stewardship and incorporating evolving member sentiments into our investment range. They also lead our external sustainability profile and are an active member of our local Better Bankside Sustainability Group.

The Investment Analyst leads on our technical climate reporting calculations, working with money managers and climate data providers to obtain and analyse emissions data throughout the year. They are also tasked with tracking ongoing progress against targets as part of our annual report back to the ARC.

Sustainability-focused roles have an ongoing objective related to continuous professional development, in relation to both the evolving regulatory landscape and requirements for listed companies. In 2025 the team attended a number of climate-related workshops run by MSCI, the London Stock Exchange Group and also the Better Bankside Sustainability Group.

PensionBee meets on a regular basis with the TCFD and climate reporting teams of our money managers, to talk through changes to our annual emissions by plan, evolving data quality, divergence in emissions data across data providers, and discussion on future assurance of our emissions data. We are pleased to share that 2025 was another year marked by an increase in both the quality and availability of emissions data.

In 2025, we continued to receive regular support from our long-standing external sustainability and climate partner, Verco, who we have worked with since 2021. They assisted with updating emission boundaries, calculations and formulation of our ongoing progress against net zero targets, in line with best practice for the sector.

We will continue to work with external experts to ensure our climate-reporting calculations are verified and accurate, but also consistent with the latest methodologies. This work is both as part of our Target Review Process, where we reassess our baseline calculations and public targets at least every five years, but also to ensure we are always kept up to date with latest changes in climate science and metrics.

**1.2 Our Management**

PensionBee’s culture is one of our most fundamental tools for effective risk management. Our management promotes risk awareness, transparency and accountability, and places a strong emphasis on the timely identification, escalation and reporting of risks.

Management’s role in assessing and managing climate-related risks through our risk management framework is described in detail in the Managing our Risks section of the Strategic Report within the Annual Report and Financial Statements 2025.

**2. Strategy**

**2.1 Climate-related Risk and Opportunity**

Climate Risk is included in the Company’s internal risk register as a Principal (or Level 1) Risk, and climate-related sub-risks (Climate Business Continuity, Climate Compliance, Climate Liability and Third Party Supplier risks) are included as Level 2 risks. These risks are evaluated as a part of our Risk and Control Self-Assessment (RCSA), as well as on an ad hoc basis following any climate-related risk events.

Overall, Climate Risk has been rated as Low based on our assessments of Level 2 risks. Physical risk, classified under the Level 2 category Climate Business Continuity Risk (and to a lesser extent Climate Third Party Supplier Risk), poses a relatively minor risk to the business, given our small physical footprint and cloud-based operations. Transition risks are more pertinent for the business and are broadly grouped under both Climate Compliance and Climate Liability Risks.

**Climate Risks (Physical and Transition)**

Risk (Level 1)	Risk (Level 2)	Description	Response	Residual Risk Quantification	Risk Rating
Climate	Climate Business Continuity	Climate-related physical damage to facilities/equipment or impact on staff materially affecting the ability to conduct critical business activities	Low exposure given small physical footprint and a resilient operation (cloud-based operation, flexible/remote working). Risk transfer policies in place including the Engineering Policy covering physical risks.	Likelihood/Impact: <b>Unlikely/Moderate</b> Loss Estimate: <b>£30k</b>	<b>Low</b> (Within Risk Appetite)
Climate	Climate Compliance	Failure to adapt to the changing regulation and disclosure requirements associated with climate change	Compliance with regulatory (e.g. TCFD, SECR) requirements and expect compliance with incoming UK SRS from 2027 onwards. Ongoing regulatory compliance is monitored by the second line risk function and Head of Sustainability.	Likelihood/Impact: <b>Unlikely/Moderate</b> Loss Estimate: <b>£2k</b>	<b>Low</b> (Within Risk Appetite)
Climate	Climate Liability	Liability resulting from changes in climate-sensitive investment exposures	Exclusionary baseline screens are applied to our funds to reduce harmful exposures to thermal coal and oil sands. We also offer a Paris-aligned Climate Plan, which is both fully screened for fossil fuels and seeks to reduce carbon emissions intensity in the portfolio annually by 10%. FinTech Insurance Policy in place covering detrimental changes in our income statement.	Likelihood/Impact: <b>Possible/Moderate</b> Loss Estimate: <b>£30k</b>	<b>Low</b> (Within Risk Appetite)
Climate	Climate Third Party Supplier	Disruption of business activities due to critical third-party service providers being impacted by climate-related events	Resilient, cloud-based operation. Money managers, banking and cloud providers are all investment grade financial institutions with established business continuity plans.	Likelihood/Impact: <b>Rare/Major</b> Loss Estimate: <b>£30k</b>	<b>Low</b> (Within Risk Appetite)

The above-mentioned sub-risks are generally of relevance across a combination of the short (one to five years), medium (five to 10 years) and long-term (10 to 30 years) time horizons. Acknowledging that some may become more or less likely over time, due to the changing physical and transition risk profile of our geography and sector, we have assessed the following as the key climate-related risks and opportunities over each time horizon. We will reassess these risks at least on an annual basis, or as important issues arise, in line with the risk management framework.

**Short-Term**

In the next one to five years, we have identified Climate Business Continuity as the predominant climate related short-term risk facing the Company. This is driven by the inherent interconnectivity of the global IT infrastructure in which PensionBee and our third party suppliers operate. Climate-related events - both local and global - that impact third parties of PensionBee could result in degraded operations without adequate mitigations in place.

PensionBee maintains a strong Business Continuity Plan that covers a wide array of systems we use, with a focus on customer-impacted third parties. The scenarios covered within the plan are inclusive of climate-related events and detail the specific contingencies to provide availability of service.

Additionally, the Company operates a predominantly cloud-based technology infrastructure across a wide geographical area with redundancy and back-up processes to ensure the ability to move capacity to unaffected regions during a business continuity event.

These are managed under the Level 2 Climate Compliance Risk and will primarily be driven by changes in the regulatory regime for listed UK businesses/pension schemes and continuously evolving policy actions. We have closely monitored changes to the UK regulatory landscape. Associated legal risks will also increase as the expertise and resources needed to meet increasing climate-related regulatory, mitigation and adaptation demands also rise.

### Medium-Term

In the next five to 10 years, climate-related risks will focus more on the potential market and reputational risks associated with indirect exposure to high-emitting sectors through investee companies or sectors otherwise exposed to Climate Risk. This will be managed under the Level 2 Climate Liability Risk and addressed through the money managers.

Over this time horizon, opportunities will develop as the market grows. We will continue to monitor consumer trends, which currently point towards increased demands for low-carbon products. We will proactively seek the views of our customer base through regular engagement to make sure the investment plans continue to meet our customers' needs, and access new markets where appropriate.

### Long-Term

Over the next 10 to 30 years, which comprises our longer-term horizon, we recognise that there are difficulties in accurately predicting the specific market, policy or environmental context in which our business will operate. As a retirement savings provider interested in the long-term financial performance of our investments, the exposure of our investee companies to both climate risk and climate opportunity is of great importance.

We expect to see an increased Level 2 Climate Business Continuity and Climate Third Party Supplier Risk through business interruption and damage across operations and supply chains, with consequences for input costs, revenues, asset values and insurance claims. Crucially, the quantum of assets which may be stranded may increase with a delay in the transition to net zero. However, over this time horizon we also see a significant opportunity to be seen as a leader in our field, in addressing the challenges of climate change through our products and services, resilience and risk management strategy.

Leadership will be shown through addressing the challenges of climate change through both our asset base (choice of customer-led and climate-related investment plans), our corporate citizenship and sustainability profile (strong ESG ratings) and our voting record (on climate-related issues).

## 2.2 Impact on the Business

All the key climate-related risks identified with the greatest potential to impact our business, have had some impact on the organisation's business, strategy or financial planning.

Minimising Climate Liability Risk in our investment portfolio, resulting from changes in climate-sensitive investment exposures, or from failure to communicate our climate change strategy and targets, is a priority for our business and our customers.

As evidenced through our annual customer engagement and surveys, climate-related issues are also of huge importance to our customers, and therefore impact our plan selection, our approach to stewardship and our choice of voting policy.

In 2025, customers in our Climate Plan ranked greenhouse gas ('GHG') emissions reduction as the issue of most priority and importance to them. In 2025, 40% of survey respondents in the Tracker Plan told us they wanted to start transitioning away from fossil fuels.

We also invite feedback on our exclusionary screening approach by plan, to ensure it remains aligned with the evolving views of our customer base over time. PensionBee applies baseline ESG exclusionary screens to the UK investment plan range, where both the asset class and the plan investment objectives allow.

### Climate Plan

2025 marked our first full year of the PensionBee Climate Plan, which launched to customers in Q4 2024. The plan tracks an MSCI Paris-Aligned Benchmark ('PAB') with custom PensionBee exclusionary screens, as directed by our customers. PAB minimum standards include, but are not limited to, a set of baseline exclusions and a minimum 7% year-on-year decarbonisation pathway as defined by the EU Climate Benchmark Regulations. The decarbonisation pathway aims to reduce the carbon intensity over time. This rate is in line with the Intergovernmental Panel on Climate Change forecasts and in line with expectations of customers, who wish to see their pension investments align with international climate change agreements.

The Climate Plan seeks to exceed PAB minimum standards, to follow a more ambitious 10% year-on-year decarbonisation pathway. As a result the portfolio's carbon footprint and intensity are dramatically lower, particularly on Scope 3 emissions, resulting in a weighted average carbon intensity ('WACI') of less than half that of its benchmark. In 2025, the plan also demonstrated substantially stronger climate alignment than the parent index, MSCI ACWI, across nearly all key sustainability metrics. Its exposure to green revenues (19.6% vs. 9.8%) is notably higher, while brown revenue exposure is eliminated entirely (0.0% vs. 4.6%)<sup>15</sup>

### Changes to our Default Plan Range in 2025

In 2025, we updated our plan range, to better align with our customers' long-term objectives. We retired our old default, the Tailored Plan (funds based on retirement date with eight vintages), moving customers under 50 into the Global Leaders Plan, and customers over 50 into our 4Plus Plan. This work took place through 2025 and changes came about as a result of customer feedback, namely a desire for investments to be responsive to market conditions and the changing needs of retirement savers, in both accumulation and decumulation.

<sup>15</sup> Green revenues are defined as the portion of a company's income derived from products or services that contribute to the transition to a sustainable, low-carbon economy, whereas brown revenues are generated from activities considered carbon-intensive or harmful to the environment.

As approximately 84% of our UK customer base is invested in one of our default plans, the emissions profiles of these two default plans will be essential in achieving our public 2050 commitment to a long-term reduction in GHG emissions across all operations and investments in line with the Paris Agreement.

As a result, consideration was given to the exclusionary approach of our new default plans and customisations made as a result. Both our new default plans now have a custom exclusionary screening approach. Custom screens on the Global Leaders Plan are made up of a combination of the BlackRock LifePath baseline screens carried across from the Tailored Plan, or as a result of direct customer feedback. The Global Leaders Plan is fully screened for: companies deriving revenue from thermal coal or oil sands; companies associated with controversial weapons or nuclear weapons; companies deriving revenue from tobacco, or gambling, or civilian firearms; companies that fail to comply with the United Nations Global Compact Principles; and companies involved in MSCI Red Flag ESG Controversies.

The 4Plus Plan is an actively managed fund with a target return objective. Portfolio managers at State Street have discretion to use proprietary and third party funds to meet this target objective. State Street funds contain baseline screening, but some of the third party funds remained unscreened in early 2025. As part of our move to 4Plus Plan, State Street launched their own screened versions of these third party funds and will have completed this work early 2026. Following that the 4Plus Plan will be fully screened for: companies deriving revenue from thermal coal; companies associated with controversial weapons; companies deriving revenue from tobacco; and companies that fail to comply with the United Nations Global Compact Principles.

The 4Plus Plan, along with all our State Street plans, also benefits from an enhanced engagement stewardship strategy, as part of State Street's Sustainability Stewardship Service. State Street Europe is also a signatory of the Net Zero Asset Managers (NZAM).

The Global Leaders and the 4Plus Plan vote in accordance with the ISS SRI policy. This policy seeks to vote against or withhold from directors individually, on a committee, or potentially the entire board due to material failures of governance, stewardship, risk oversight, including demonstrably poor risk oversight of environmental and social issues. This includes climate change responsibilities at the company, including failure to adequately manage or mitigate environmental, social and governance (ESG) risks or where it is determined that the company is not taking the minimum steps needed to be aligned with a Net Zero by 2050 trajectory.

## 2.3 Resilience of PensionBee Strategy to Climate Change

As an online retirement savings provider primarily using cloud-based technology, PensionBee has maintained its relatively small environmental footprint in 2025. We now have three locations, London (UK), New York (US) and Montevideo (Uruguay), but offer flexible, remote working to employees or contractors in all locations. We continue to be a digital champion in the UK retirement market, as a paperless provider with cloud-based servers.

Our efforts in 2025 were focused on expanding our reporting of Scope 3 emission categories that are material to our business. In addition to Category 15 (Investments), we report Category 1 (Purchased Goods and Services), Category 3 (Fuel-and Energy-related Activities, not included in Scope 1 and 2), Category 5 (Waste Generated in Operations), Category 6 (Business Travel), Category 7 (Employee Commuting), and Category 11 (Use of Sold Products) as being relevant to our business.

We are now also reporting Category 11 (Use of Sold Products) in our GHG inventory for the first time in 2025, due to increased data availability. This covers our PensionBee app emissions and uses app-specific data taken from: the data centre used by the PensionBee app, device type, time spent on the app; and the typical volume of data transferred through app usage (in kWh/h) (using the standardised industry method for measuring the emissions usage of the app). We worked with Verco to help calculate the emissions from the number of hours spent by our customers on the app. We mapped this to 2024, in line with all our Scope 3 reporting.

### Scope 3 Assessment Boundary - GHG Protocol

The table that follows demonstrates the GHG Protocol scope categories included within the assessment. This includes a description of the operations included within the assessment, and reasons why we excluded various scope categories.

Scope	Scope Category	Included within Assessment	Description
3	3.1 Purchased goods and services	Y	These emissions are associated with the purchase of marketing, technology, consulting, and finance services. Additionally, emissions associated with the sponsorship of Brentford Football Club have been included.
	3.2 Capital goods	N	PensionBee has no capital goods.
	3.3 Fuel and energy-related activities	Y	These emissions accounting for the London office's FY24 energy consumption have been included in the GHG assessment boundary.
	3.4 Upstream transportation and distribution	N	PensionBee has no upstream transportation or distribution.
	3.5 Waste generated in operations	Y	All waste generated in operations at the London office has been calculated in this assessment.
	3.6 Business travel	Y	Air travel, hotel stays, train travel and road travel have all been included in this calculation.
	3.7 Employee commuting	Y	The calculation includes emissions associated with the commuting of PensionBee employees.
	3.8 Upstream leased assets	N	PensionBee has no upstream leased assets.
	3.9 Downstream transportation and distribution	N	PensionBee has no downstream transportation or distribution.
	3.10 Processing of sold products	N	PensionBee has no processing of sold products.
	3.11 Use of sold products	Y	PensionBee has included sold products in its GHG inventory in FY24 due to better data collection. The number of hours spent on the app is now tracked <sup>16</sup> internally to allow for more accurate emissions calculations.
	3.12 End-of-life treatment of sold products	N	PensionBee has no end-of-life treatment of sold products.
	3.13 Downstream leased assets	N	PensionBee has no downstream leased assets.
	3.14 Franchises	N	PensionBee has no franchises.
	3.15 Investments	Y	These emissions associated with PensionBee's investment portfolio have been calculated using a methodology outlined by Verco.

<sup>16</sup> The number of hours used in the emissions calculations are limited to three-month customers' app usage data (data as at November 2025).

In 2023, we took our first step towards our commitment to achieve net zero emissions across the entire business by 2050, a goal which would support both the UK's net zero target for 2050 as well as global efforts to achieve a societal transition to a low carbon economy. In order to achieve this, we committed to setting interim 2030 targets, which are detailed below.

We continue to build the resilience of our overall strategy to climate-related issues under different future scenarios, and how we may need to adapt to meet the challenges of each. As noted above, given PensionBee's limited direct environmental footprint, we focused specifically on the Scope 3 emissions within our default plan in 2024, which represents the substantial majority of our asset base in that year.

We recognise that the key climate-related risks and opportunities identified, particularly over the medium and long-term time horizons, are highly dependent on assumptions made regarding the ways in which climate-related issues will manifest over the coming years.

#### We therefore worked with BlackRock to consider three scenario types, based on internal BlackRock models:

- 'Orderly transition' scenarios, which assume climate policies are introduced early and become gradually more stringent, reaching global net zero CO<sub>2</sub> emissions around 2050 and likely limiting global warming to below 2° C on pre-industrial averages.
- 'Disorderly transition' scenarios, which assume climate policies are delayed or divergent, requiring sharper emissions reductions achieved at a higher cost and with increased physical risks in order to limit temperature rise to below 2° C on pre-industrial averages.
- 'Hothouse world' scenarios, which assume only currently implemented policies are preserved, current commitments are not met, and emissions continue to rise, with high physical risks and severe social and economic disruption and failure to limit temperature rise.

In the above scenarios, transition risk is defined as the risk to the value of an asset as a result of the transition to a lower carbon economy (i.e. the risk due to the potential changes to the economy from such a transition). Physical risk is defined as the risk to the value of an asset as a result of change to the physical environment from climate change.

Following the industry's common practice in climate regulatory reporting, the 'hothouse world' scenario was defined as the counterfactual base case which assumes no future transition and therefore no associated transition risk; this scenario is assumed to be fully priced into markets and therefore represents no additional risk to valuations. This scenario does have potential physical climate risk, as defined above, and so we report transition risk for the 'orderly transition' and 'disorderly transition' scenarios, and physical risk for the 'hothouse world' scenario.

Assets within our default plan were classified as 'high-risk', 'medium-risk' or 'low-risk' depending on how the companies today are exposed to the different scenarios within BlackRock's underlying proprietary climate risk models. The model assumes there are no new business segments in an individual company's response to the transition and so the modelled response takes into account the behaviour and structure of issuers as currently configured without any changes to their activities. In addition to this, similar to any model, assumptions and the quality of data inputs may pose limitations to the accuracy and precision of the scenario outcomes.

The analysis showed what proportion of the portfolio is classified within each category, with the categories defined based on the modelled risk to the valuation of the business within each scenario. The 'high-risk' category contains assets that are estimated to be at risk of a 50% reduction or greater to their current valuation if the assumptions of the model transpire. The 'medium-risk' category contains assets with a risk to valuation between 10% and 50%, and 'low-risk' contains the remaining assets. None of the assets in Tailored were classified as 'high-risk' and the overwhelming majority of assets were classified as 'low-risk'.

So, when considering the upper estimate of risk to valuation in the 'low-risk' category, which is 10%, the overall valuation risk to assets and by proxy, the PensionBee investment plans overall, is approximately 10%.

PensionBee's Finance Team has considered the impact on PensionBee's Revenue of a 10% reduction in valuation in PensionBee's overall asset base. PensionBee's Revenue is almost entirely derived from fees earned on its Assets under Administration and is therefore sensitive to changes in market valuations. Because the exact nature of the climate transition is unknown, PensionBee also considered the impact of a 20% reduction in valuations for prudence. The impact of a 10% and 20% reduction in valuations would be to reduce PensionBee Revenue by 7.5% and 15% respectively.

PensionBee's new default solutions will bring additional carbon emissions reductions from the end of 2025 onwards. However, for our Scope 3 emissions reporting, we will only see the impact of that from next year, as we have a one-year data lag from managers.

## 3. Climate Risk Management

Climate Risk is defined as the risk of negative impact of climate change or its broader economic, financial and societal consequences on the Company, or the Company's failure to meet sustainability requirements from a commercial, regulatory and stakeholder perspective. Climate Risk is one of PensionBee's Principal Risks, which are set out in the **Managing our Risks section of the Strategic Report** within the [Annual Report and Financial Statements 2025](#).

**Climate Risk drivers can be grouped into categories of sub-risks relevant to PensionBee:**

- Climate Business Continuity Risk: Climate-related physical damage to facilities/equipment or impact on staff materially affecting the ability to conduct critical business activities.
- Climate Compliance Risk: Failure to adapt to the changing regulation and disclosure requirements associated with climate change.
- Climate Liability Risk: Liability resulting from changes in climate-sensitive investment exposures or failure to communicate our climate change strategy and targets.
- Climate Third Party Supplier Risk: Disruption of business activities due to supply chains/critical third party provider services being impacted by climate-related events.

**3.1 Risk Identification and Assessment**

Climate Risk management is a part of our comprehensive risk management framework. The framework’s components ensure adequate identification, management and communication of climate risks as they arise, so that decisions can be made on a timely basis.

Climate Risks facing the business are managed within the Low-risk appetite level set by the Board. The Board confirms its risk appetite for Principal Risks in the ARC as a part of its review of the Risk Governance Framework, twice a year. For most risks, risk appetite is Low. The assessments against the Board’s risk appetite are based on an analysis of the impact, likelihood and internal controls related to climate risks.

Further details about the PensionBee risk management process are set out in the **Managing our Risks section of the Strategic Report** within the [Annual Report and Financial Statements 2025](#).

**3.2 Active Asset Ownership at PensionBee**

PensionBee is an active asset owner, supporting well-framed environmental and social resolutions that seek to promote good corporate citizenship while enhancing long-term shareholder and stakeholder value, in line with ISS’s Socially Responsible Investment (“SRI”) voting policy.

In December 2025, 95% of the PensionBee asset base was voted according to this policy.<sup>17</sup> Under the SRI policy, climate risk mitigation requires investee companies that are significant GHG emitters to demonstrate they are taking minimum steps to be aligned with a net zero by 2050 trajectory or risk a routine vote against their incumbent responsible committee chair or other directors.

Expectations include publishing a TCFD statement, a net zero by 2050 target and setting medium-term targets for reducing GHG emissions. The SRI policy can also vote against directors owing to material ESG failures, including a failure to adequately manage or mitigate ESG risks.

<sup>17</sup> Reflects 94% of the Assets under Administration across the Tailored, Climate, Tracker and 4Plus investment plans as at 31 December 2024. See definitions on page 45 of the Measuring our Performance section of the Strategic Report.

We have a history of working with other institutional investors to publicly endorse climate-related environmental resolutions, including those associated with risks of new fossil fuel financing. We work in coalition with a broad range of investors who share an ambition to mitigate climate risk in investee companies and as part of a broader movement to increase transparency for and accountability to shareholders in the system. We also do this as part of our vision to live in a world where everyone can enjoy a happy retirement and as part of our work to amplify the voices of savers within a highly intermediated system.

**3.3 Management and Response**

Further details are set out in the **Managing our Risks section of the Strategic Report** within the [Annual Report and Financial Statements 2025](#).

**4. Metrics & Targets**

**4.1 Metric**

PensionBee tracks a number of metrics in order to measure and manage exposure to climate-related risks and opportunities.

These currently include energy and emissions as part of our SECR reporting obligations, our TCFD reporting and our public commitment to achieve net zero emissions by 2050.

**The range of portfolio metrics (and units) we used for reporting in 2025 were:**

- Weighted Average Carbon Intensity (“WACI”) (tonnes CO<sub>2</sub>e per \$m Revenue)
- Carbon Footprint (tCO<sub>2</sub>e / \$m Invested)
- Carbon Intensity (tonnes CO<sub>2</sub>e per \$m Invested)
- Absolute Carbon Emissions (Scope 1 and 2) (tonnes CO<sub>2</sub>e)

For our Scope 1 and 2 operational emissions we use an absolute emissions metric (tonnes CO<sub>2</sub>e), as per the SECR guidance. Our 2025 SECR disclosure can be found in the Climate-related Disclosures section of the Strategic Report within the [Annual Report and Financial Statements 2025](#).

For Scope 3 (Categories 1-14 GHG Protocol) emissions reporting, we are disclosing relevant categories on a voluntary basis to enhance our emission reporting transparency. For these categories, we use tCO<sub>2</sub>e as the metric to provide a standardised measure as it allows emissions from different sources to be expressed on a common scale.

For Scope 3 (Category 15 GHG Protocol) emissions reporting, TCFD recommends that asset owners and money managers disclose the WACI of their portfolios in tCO<sub>2</sub>e / \$ million Revenue. In accordance with the guidance, we continued to use this metric for our fourth year of Scope 3 emissions reporting. Since FY 2024, we continued disclosing Carbon Footprint and Absolute Carbon Emissions metrics for Scope 3, as the availability and accuracy of data from our money managers has continued to improve.

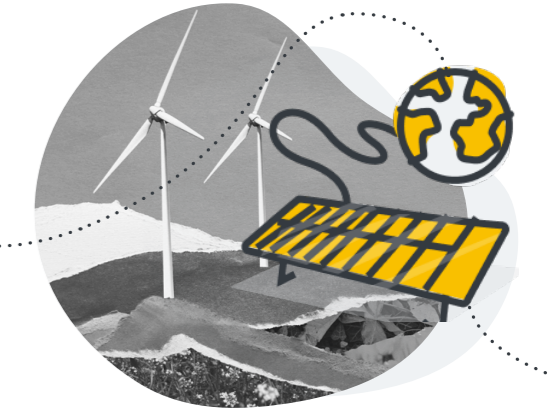
We are committed to ensuring that we use the most up to date and relevant calculation methodologies as climate science for our sector, as it evolves. Our metrics are reviewed regularly as part of our Target Review Process, which is overseen by the Board.

**4.2 Emissions**

**Scope 1 and 2 Emissions**

GHG Emissions	2021		2022 Base Year		2023		2024		2025	
	Tonnes CO <sub>2</sub> e	tCO <sub>2</sub> e / £m Revenue <sup>18</sup>	Tonnes CO <sub>2</sub> e	tCO <sub>2</sub> e / £m Revenue <sup>19</sup>	Tonnes CO <sub>2</sub> e	tCO <sub>2</sub> e / £m Revenue <sup>20</sup>	Tonnes CO <sub>2</sub> e	tCO <sub>2</sub> e / £m Revenue <sup>21</sup>	Tonnes CO <sub>2</sub> e	tCO <sub>2</sub> e / £m Revenue <sup>22</sup>
<b>Scope 1</b> <sup>23</sup>	-	-	-	-	-	-	-	-	-	-
<b>Scope 2</b> GHG Emissions (location- based) <sup>24</sup>	<b>8.36</b>	<b>0.64</b>	<b>12.07</b>	<b>0.67</b>	<b>9.91</b>	<b>0.42</b>	<b>9.30</b>	<b>0.28</b>	<b>9.67</b>	<b>0.23</b>
<b>Scope 2</b> GHG Emissions (market- based) <sup>25</sup>	-	-	-	-	-	-	-	-	-	-

<sup>18</sup> 2021 Revenue of £12.8m.  
<sup>19</sup> 2022 Revenue of £17.7m.  
<sup>20</sup> 2023 Revenue of £23.7m.  
<sup>21</sup> 2024 Revenue of £33.2m.  
<sup>22</sup> 2025 Revenue of £42.6m.  
<sup>23</sup> Scope 1 being emissions from the Company’s combustion of fuel and operation of facilities. PensionBee generates no Scope 1 emissions.  
<sup>24</sup> Scope 2 being electricity (from location-based calculations), heat, steam and cooling purchased for the Company’s own use.  
<sup>25</sup> Scope 2 being electricity (from market-based calculations), heat, steam and cooling purchased for the Company’s own use.



Scope 3 (Categories 1-15 GHG Protocol) Emissions

	2023 (tCO <sub>2</sub> e) <sup>26</sup>	2023 (%)	2024 (tCO <sub>2</sub> e)	2024 (%)
Category 1: Purchased Goods and Services	1,351 <sup>27</sup>	0.85	1,891	1.19
Category 3: Fuel- and Energy-Related Activities (Not Included in Scope 1 or Scope 2)	3.2	0.002	3.6	0.002
Category 5: Waste Generated in Operations	1.1	0.001	5.2	0.003
Category 6: Business Travel	14.5 <sup>28</sup>	0.009	43.1	0.027
Category 7: Employee Commuting	2.4 <sup>29</sup>	0.002	3.2	0.002
Category 11: Use of Sold Products	-	-	1.2	0.001
Category 15: Investments	156,963	99.13	156,413	98.79
<b>Total</b>	<b>158,335</b>	<b>100</b>	<b>158,360</b>	<b>100</b>

Scope 3 (Category 15 GHG Protocol) Emissions

	2019 Base Year	2022	2023	2024 <sup>30</sup>
Weighted Average Carbon Intensity (tCO <sub>2</sub> e / \$m Revenue)	178.4	121.3	76.9	63.0
Carbon Footprint (tCO <sub>2</sub> e / \$m invested)	-	-	125.4	96.9
Absolute Carbon Emissions (tCO <sub>2</sub> e)	-	-	156,963	156,413

Summary of PensionBee's Scope 3 Emissions Categories



4.3 Targets

We began reporting our Scope 1 and 2 absolute emissions under SECR in 2021. In 2022, we moved into new long-term office premises in the UK, so we have used this as our base year. In 2025, our operational emissions globally were 9.67 tCO<sub>2</sub>e. This encompassed purchased electricity for leased office space in the UK and the number of passes rented for coworking spaces in the US and Uruguay. PensionBee generated no Scope 1 emissions. Notwithstanding our increase in global office space, we have continued to make good progress towards our Scope 1 and 2 targets in 2025.

<sup>30</sup> In Q4 2024, 100% of AUA of PensionBee's Fossil Fuel Free Plan was transitioned into the Climate Plan, therefore we have used a prorated figure for emissions metrics to account for actual days that both funds were invested within the PensionBee portfolio. We've chosen not to use the Point-in-Time method, which is considered to be industry best practice in asset management firms that have multiple investment changes throughout the year, given the single investment change occurred at the end of the year.

<sup>26</sup> Some categories of Scope 3 emissions from FY23 figures have been restated in this TCFD reporting due to methodological improvements. The applicable categories are Categories 1, 6 and 7.  
<sup>27</sup> Emission factors were updated from USEEIO to BEIS in FY24. BEIS publishes annually updated, UK-aligned spend-based factors, allowing for more current and market-reflective emissions calculations. While USEEIO factors remain methodologically valid, they are updated less frequently and are not tailored to UK reporting expectations. Moreover, we were able to collect more detailed supplier spend information this year, we could extrapolate this to classify a larger proportion of FY23 spend into the correct emissions categories.  
<sup>28</sup> Emission factors were updated to include the corresponding Well-to-Tank (WTT) emissions. This combines both emission factors and is in line with current best practice to capture the full lifecycle emissions associated with our firm's travel data.  
<sup>29</sup> Emissions factors were updated to use the latest Government NTS journey-split data which is released annually, replacing last year's research-based assumptions. This aligns the journey distances already drawn from the NTS and makes the dataset more robust and repeatable.

For Scope 3 (Category 15 GHG Protocol) emissions, we used 2019 as our base year, to mirror the base year for our default Tailored Plan (BlackRock LifePath), representing the vast majority of our asset base. In 2019, our scope was 97% of Scope 3 (Category 15) emissions by AUA value and the baseline WACI value was 178.4 tCO<sub>2</sub>e / \$m Revenue. We then back-cast emissions data to 2019 from other plans to obtain Scope 3 emissions for 97% of the Assets under Administration ('AUA'), against a target ambition of 90% coverage. Base year metrics were calculated on fund holdings as of 31 December 2019.

As a result of the lag in the money managers obtaining emissions data from third party providers, we continue to report Scope 3 emission data one year in arrears. In 2024, our Scope 3 (Category 15) emissions were for 96% of the PensionBee portfolio by AUA value and our WACI value was 63.0 tCO<sub>2</sub>e per \$m Revenue, a marked decrease from 2023 (2023: 76.9). Additionally, we have continued to report on two new metrics that were first introduced in 2023, Carbon Footprint (tCO<sub>2</sub>e / \$m invested) and Absolute Carbon Emissions (tCO<sub>2</sub>e). We have added these in to start to move away from a reliance on WACI as our sole metric for Scope 3 data, as WACI is sensitive to market movements.

In 2022, PensionBee set near-term (interim) targets for 2030 and long-term net zero targets for 2050. These targets are aligned with the Paris Agreement and are consistent with emissions reductions required to keep global warming within 1.5°C by 2100. We remain committed to tracking our progress and targets and adjusting them as needed to ensure these targets are met.

Near-term (interim) Targets for 2030

PensionBee has committed to reducing Scope 1 and 2 GHG emissions 38% by 2030 from a 2022 baseline. Our near-term target for Scope 1 and 2 emissions by 2030 is 7.5 tCO<sub>2</sub>e.

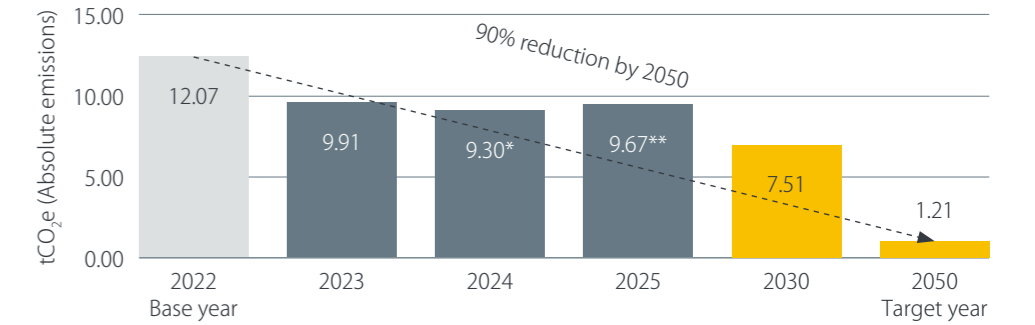
The Company has also committed to reducing Scope 3 (Category 15) emissions associated with the investment portfolio by 50% by 2030, from a 2019 baseline. Our near-term target for WACI is 89.2 tCO<sub>2</sub>e / \$m Revenue by 2030.

Long-term net zero Targets for 2050

PensionBee has committed to achieving a long-term Paris-aligned reduction in GHG emissions across all operations and investments. To achieve this, PensionBee will reduce Scope 1 and 2 GHG emissions by 90% by 2050, from a 2022 baseline. Our long-term target for Scope 1 and 2 absolute emissions by 2050 is 1.2 tCO<sub>2</sub>e.

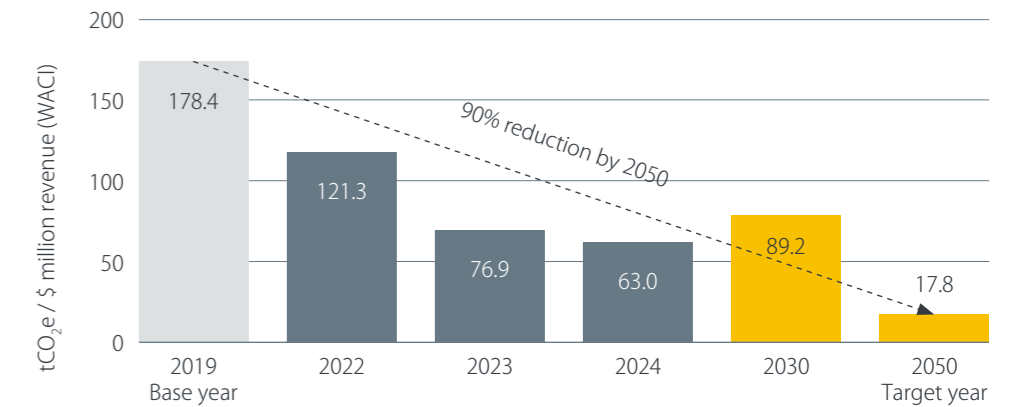
The Company will also reduce Scope 3 (Category 15) emissions associated with the investment portfolio by 90% by 2050, from a baseline of 2019. The long-term target for WACI is 17.8 tCO<sub>2</sub>e / \$m Revenue by 2050.

Progress on Scope 1 and 2 against 2030 and 2050 Targets



PensionBee Group's global emissions in 2024 UK: 8.30 tCO<sub>2</sub>e; US: 1.00 tCO<sub>2</sub>e.  
 PensionBee Group's global emissions in 2025 UK: 6.69 tCO<sub>2</sub>e; US: 2.98 tCO<sub>2</sub>e; and Uruguay: 0.00 tCO<sub>2</sub>e

Progress on Scope 3 against 2030 and 2050 Targets



Commitment to Review

The Company has also made a commitment to review its target ambition and metrics regularly (at least every five years) to ensure that we remain aligned with the best understanding of the science required to achieve 1.5°C limited warming by 2100. This forms the basis for our Target Review Process, which is overseen by the ARC and our Board.

# 8 Governance, Ethics & Transparency

Strong governance, high ethical standards and transparent decision-making are fundamental to PensionBee's mission to help everyone look forward to a happy retirement.

Our approach is designed to safeguard our customers' interests, adapt to their accessibility needs, support their long-term retirement outcomes, and maintain trust.

## Digital Accessibility and Inclusive User Experience

Accessibility is a core part of product quality at PensionBee. Conforming with WCAG 2.2 AA is the minimum standard for every product, before it reaches production. Accessibility issues that block task completion or assistive technology use are release blockers.

### Our Global Component Library

In 2024 we worked with a range of PensionBee customers with accessibility issues. In a series of interviews and shared learning sessions, we asked our customers to walk us through any accessibility issues with our site. These user-led insights formed the basis for our development work in 2025.

In 2025, we strengthened digital accessibility and usability by moving from individual feature improvements to a single, unified experience across mobile and web.

As part of that we also launched our shared Global Component Library. This is a collection of user interface (UI) elements like buttons, form fields and navigation bars that can be reused by different teams across different projects across PensionBee. This library means that accessibility is embedded at a foundational level. We can also design and test components once improved reliability against recognised accessibility standards and ensured updates benefited all customers, including those using assistive technologies.

While accessibility is never complete, a unified experience strengthens our ability to respond to customer needs and maintain trust over time.

Customer feedback continued to inform this work throughout the year. Engagement with customers who experience accessibility barriers shaped improvements to language, layout and interaction design, supporting greater confidence when completing key tasks such as transferring pensions and planning for retirement.

### Responsible Product and Customer-Centric Conduct

We design PensionBee's products and services to deliver fair outcomes for consumers. As an execution-only pension provider with no sales commissions or sales targets, we align incentives with customer satisfaction and service quality rather than product sales. Every customer is supported by a personal 'BeeKeeper' during onboarding and transfers, and we have specific safeguards in place for vulnerable customers as part of our [Responsible Product Policy](#). Our product design also incorporates accessibility standards and clear communications to help customers make informed decisions about their retirement savings.

## Standards of Conduct and Compliance

We expect all employees and stakeholders acting on our behalf to uphold high standards of professionalism, honesty and integrity. These expectations are set out in our [Code of Conduct and Business Ethics Policy](#), which reflects our values of Love, Honesty, Quality, Simplicity and Innovation.

In addition to the above, there is a mandatory annual compliance and conduct training programme for all employees across the organisation, at all levels including at Board level. The training and general compliance test is updated annually, to reflect changes to legislation and best practice. All employees must pass each unit with a minimum score of 80% within a month of joining PensionBee and at least once annually.

### Our annual compliance training comprises:

- ✔ Consumer Duty
- ✔ Anti-Money Laundering
- ✔ Risk Compliance
- ✔ Fraud Prevention
- ✔ Market Abuse Regulation
- ✔ Conduct Rules for Employees
- ✔ Healthy Working
- ✔ Equality and Diversity in the Workplace
- ✔ Corporate Criminal Offences



## Data Protection, Privacy and Information Security

Respecting and protecting customer data is central to how we operate. Our [Privacy Policy](#) governs the lawful, fair and transparent processing of personal information in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation ('UK GDPR'). We implement robust administrative, technical and organisational measures to protect data, including encryption, secure data storage, multi-factor authentication and regular independent security assessments, aligned with recognised standards.

PensionBee operates a robust Information Security Management System (ISMS) and is ISO/IEC 27001 certified. We undergo regular internal and external cyber security testing to meet both our internal policies and external regulatory obligations. This includes annual penetration testing conducted by external providers, internal and external audits against our ISO 27001 certification, Cyber Essentials internal readiness assessments and external audits, and security governance reviews as part of our annual FCA audit.

Information security governance is overseen by the Information Security Committee (ISC), which meets at least three times per year and provides strategic oversight of information security matters, with outcomes reported to the Board. In addition, a monthly Risk Stakeholder Group (RSG) is held, reflecting the designation of Information Security as one of the organisation's Principal Risks, ensuring ongoing monitoring, discussion, and escalation of security risks.

Throughout the year, we perform regular assessments and security checks, including policy reviews, access control assessments, software vulnerability management, business continuity and disaster recovery (BCP/DR) testing, and incident response rehearsals including cyber table top simulations with Senior Management.

PensionBee operates a robust Information Security Management System (ISMS) and is ISO/IEC 27001 certified. We undergo regular internal and external cyber security testing to meet both our internal policies and external regulatory obligations. This includes annual penetration testing conducted by external providers, internal and external audits against our ISO 27001 certification, Cyber Essentials internal readiness assessments and external audits, and security governance reviews as part of our annual Financial Year-End Audit.

### Responsible use of Artificial Intelligence and Automation

As a digital-first pension provider, PensionBee uses technology, data analytics and automation to improve operational efficiency, resilience and customer experience. Where artificial intelligence (AI) and algorithmic models are used or deployed - whether developed internally or provided by third-party suppliers - we are committed to applying them in a responsible, transparent and risk-aware manner that upholds the interests of customers and aligns with evolving regulatory expectations.

Our approach is supported by appropriate governance and oversight, with senior accountability, proportionate controls and risk considerations applied to the use of AI-enabled tools, reflecting their materiality and impact. We seek to ensure that such technologies complement human judgement and do not result in unfair, biased or opaque outcomes for customers.

We continue to monitor developments in UK and international policy, including the FCA's supervisory expectations for ethical and explainable use of AI, to ensure our practices remain proportionate, compliant and aligned with best practice in financial services technology governance.

## Human Rights and Responsible Business Practices

Respect for human rights is embedded in our culture and policies. Our [Human Rights Policy](#) commits PensionBee to uphold internationally recognised human rights principles in our operations, workforce and supply chain. We support a diverse and inclusive workplace and seek to address human rights risks through appropriate due diligence, grievance mechanisms and engagement with partners and suppliers.

### Modern Slavery and Human Trafficking

PensionBee has a zero-tolerance approach to slavery, forced labour and exploitation, and expects the same standards from those who work with or on behalf of PensionBee. Our approach is set out through our Human Rights Policy, Code of Conduct and Supplier Code of Conduct, which expect compliance with applicable labour laws, respect for human rights and ethical employment practices. Where concerns are identified, we expect them to be raised promptly and addressed appropriately, supported by our speak-up and whistleblowing arrangements.

## Whistleblowing

We encourage an open and transparent culture in which colleagues feel confident to raise concerns. Our [Whistleblowing Policy](#) provides a clear process for reporting actual or suspected wrongdoing, whether related to legal compliance, unethical behaviour or policy breaches, and is designed to protect individuals from retaliation.

PensionBee's whistleblowing arrangements allow reports to be made at any time, either anonymously or using the individual's full name, via electronic submission (email) or by post. Where a disclosure is made anonymously, PensionBee will not seek to uncover the whistleblower's identity. All disclosures are received and managed by the appointed whistleblowing champion, who logs each report, assesses the concern raised, and escalates matters where appropriate to the Board of Directors and, if relevant, the Financial Conduct Authority, with feedback provided to the whistleblower where and as appropriate.

The policy is designed to protect individuals from retaliation when reporting concerns in good faith and explains internal channels for making disclosures as part of its processing structure. As PensionBee operates only in the UK and the US, reporting is conducted in English.

## Regulatory Engagement, Transparency and Accountability

As an FCA-regulated pension provider, PensionBee engages constructively with regulators and industry bodies to promote regulatory frameworks that protect consumers and strengthen market integrity. We do not engage in party-political activity; where we participate in policy discussions, it is to advance customer interests and support effective market standards.

We are committed to transparent reporting and make our sustainability disclosures publicly available, including those aligned to ESG frameworks such as the Workforce Disclosure Initiative, Sustainability Accounting Standards Board and Task Force on Climate-related Financial Disclosures. We regularly review and update our governance practices, risk management processes and policy frameworks in response to stakeholder feedback, regulatory developments and evolving best practice.

## Tax Strategy and Governance

PensionBee is committed to responsible tax management that aligns with our values and supports trust with customers, regulators and wider society. Our Tax Strategy sets out the principles under which tax affairs are managed across the business, including our approach to tax risk, compliance and transparency.

We seek to comply fully with applicable tax laws and reporting requirements in all jurisdictions in which we operate, applying diligent professional judgement and maintaining appropriate governance, controls and documentation. PensionBee does not engage in aggressive tax planning; where tax planning opportunities arise, including the use of available reliefs and incentives, these are considered only where aligned with genuine commercial activity and our overall business strategy.

We aim to be open and constructive in our engagement with tax authorities, supporting transparency and timely disclosure, while ensuring that tax decisions are taken at an appropriate level with clear accountability and oversight.





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