YORKSHIRE BUILDING SOCIETY PENSION SCHEME

Chair's Governance Statement for the year ended 31 December 2025

Scheme Registration No: 10101681

GOVERNANCE STATEMENT
FOR THE DEFINED CONTRIBUTION SECTION AND DEFINED BENEFIT SECTION OF THE YORKSHIRE BUILDING SOCIETY PENSION SCHEME

This Chair's Governance Statement (the "Statement") has been produced for the Yorkshire Building Society Pension Scheme (the "Scheme") and its corporate trustee, YBS Pension Trustees Limited (the "Trustee"), in accordance with regulation 23 of the Occupational Pension Schemes (Scheme Administration) Regulations 1996. The Scheme's Principal Employer and Sponsor is Yorkshire Building Society (the "Society"). The Statement describes the role of the Trustee and how the Trustee, acting through its directors (the "Trustee Directors"), has met its statutory governance standards in relation to the Defined Contribution ("DC") arrangements during the Scheme year ended 31 December 2025 (the "Scheme Year") in the following areas:

- The investment options in which members' accounts are invested during the Scheme Year, including the default investment arrangements and self-select funds.
- Requirements for processing core financial transactions.
- Assessment of charges and transaction costs borne by members.
- The net return on investments for each default arrangement and self-select fund.
- Assessment of value for members.
- The requirement for Trustee knowledge and understanding.

The Statement also includes "pounds and pence" illustrations demonstrating the potential impact of costs and charges on a member's DC savings over the course of their Scheme membership.

The Statement is designed to provide members with key information and assurances regarding the proper running of the Scheme and the value it provides. The Scheme is used as a qualifying scheme for the Society's automatic enrolment obligations.

The Statement primarily relates to the Scheme's DC Section but also includes sections covering the Defined Benefit ("DB") Section and its Additional Voluntary Contribution ("AVC") arrangements (however the AVCs were moved into the main DC scheme during 2025).

The Trustee receives professional Defined Contribution ("DC"), investment and governance advice from WTW (the "Investment Adviser"). The Scheme's DC Section is administered by Fidelity (the "Plan Administrator").

Market update

The Bank of England (BoE) implemented a series of base rate adjustments throughout the 12 months to December 2025. In February 2025, the Bank of England reduced the base rate by 0.25%, bringing it down to 4.50%. Maintaining its cautious stance, the BoE enacted another 0.25% cut in May, lowering the base rate to 4.25%. In August 2025, the base rate was cut once more to 4.00%, underscoring continued caution amid rising service prices and persistent uncertainty around fiscal plans. In December 2025, the Bank of England implemented a further 0.25% cut, bringing the base rate down to 3.75%. This level was maintained through the end of the year, marking the continuation of its cautious approach into the fourth quarter. The UK inflation rate, as measured by the CPI, rose by 3.4% in the 12 months to December 2025. Through the base rate, the BoE continues to try to balance growth requirements against the risk of inflation returning and has been gradually cutting the rate as realised inflation allows. This pattern is expected to continue in the coming years. Over the same period, sterling has appreciated against the US dollar by 7.4%

Over the 12 months to 31 December 2025, equity markets returned positive performance across all regions. The FTSE All World Index returned 14.6% whilst the FTSE Emerging Index returned 17.8% (both in sterling terms). FTSE All-Share Index returned 24.0%, whilst Asia Pacific (ex Japan) was the best performing region with 31.6% (both in sterling terms). A key driver of equity returns has been increasing valuations, relative to historical norms, as optimism around the growth impact of Artificial Intelligence has dominated sentiment. Higher levels of earnings growth are now required to justify the higher valuations, with downside risks arguably more present should earnings disappoint.

UK government bond yields (which move inversely to bond price) decreased over 12 months to 31 December 2025. Long maturity UK gilts have returned 3.7% over the period (as measured by FTSE-A Gilts Over 15 Years Index) and UK gilts all stocks returned 5.0%. Similarly, inflation-linked gilt yields decreased over the 12-month period. Long maturity UK index-linked gilts returned 0.1% (as measured by FTSE-A Index-Linked Gilts Over 15 Years Index) and UK index-linked gilts all stocks returned 1.3%. Bond yields fell to a greater extent at the shorter end of the curve, causing material curve steepening. This is reflective of an expectation for lower cash rates in the shorter term, combined with concerns around government debt sustainability in the longer term.

DC Section

The Trustee has taken account of the statutory guidance in preparing this section of the Statement.

Investment strategy

Members who join the Scheme and who do not subsequently choose an investment option are placed into the default investment strategy. The Trustee is responsible for the Scheme's investment governance, which includes setting and monitoring the investment strategy for the Scheme's default arrangements. The Scheme's DC investment strategy is set out in the Scheme's Statement of Investment Principles ("SIP"). This document governs the Trustee's decisions about investments including its aims, objectives, and policies for the Scheme's investment options including the default arrangement, and the Trustee's policies in relation to the kinds of investment that should be held, risks (including how these are measured and managed) and policies on investment. It has been prepared in accordance with Regulation 2 of the Occupational Pension Schemes (Investment) Regulations 2005. A copy of the current SIP, last revised in November 2024, is attached to this document in Appendix B. A copy of the Chair's Governance Statement and SIP can also be found online at https://www.ybspensionscheme.co.uk/dc/library

The Scheme's investment objectives are:

a. To offer a suitable range of options, including a default lifestyle strategy, three additional lifestyle strategies and a range of self-select funds.

b. To recognise and limit the risk of a member's account failing to satisfy the member's reasonable expectations over the long term.

c. To optimise the long-term benefits from the Scheme by allowing members to benefit from long-term growth on their assets whilst having regard to the objectives shown under the previous paragraph.

d. To monitor the value for money received by members in the DC section from their membership of the Scheme and commission our Investment Adviser to undertake an annual review and make recommendations for improvements. The Trustee aims to ensure that the members receive good value for money but recognises that this does not necessarily equate to paying lower fees or costs for services.

Investment strategy review

The Trustee periodically, and on no less than a three-yearly cycle, reviews the appropriateness of the default arrangements. It will undertake an earlier review if there are any significant changes in legislation, investment policy or member demographics.

The Trustee completed a full DC investment strategy review in July 2024, with support from the Investment Adviser. This review covered the default investment arrangements as well as the 'self-select' arrangements. A review of the Trustee's beliefs was carried out in advance of the investment strategy review, resulting in the Trustee setting and documenting its DC investment beliefs. A membership analysis was then carried out to better understand the membership's risk tolerance and retirement objectives. Subsequently, the Scheme's lifestyle strategy designs were reviewed to ensure they could meet the varying objectives of the membership at retirement.

As a result of the strategy review of the default arrangements, the Trustee agreed to introduce a new short-dated corporate bond fund to the Flexible and Lump Sum lifestyle strategies in order to better manage members' exposure to risk as they progress towards retirement. This change was implemented in July 2024. The Trustee believes that the other 2 lifestyle funds (both 'self-select arrangements'), the Annuity and Drawdown lifestyles, still remain appropriate and so no changes were made to these strategies.

Full details of each of the Lifestyle strategies can be found on the YBS website www.ybspensionscheme.co.uk

The next investment review began in early 2026.

In addition to the default lifestyle strategies described above, for the purposes of Regulation 2A of the Occupational

Pension Schemes (Investment) Regulations 2005, due to their history and development, the following self-select funds are also classed as “default arrangements”:

- International Equity Investment Fund.
- Diversified Investment Fund.
- Pre-Retirement Fund.
- Cash Fund.

Investment performance

The Trustee undertakes regular reviews of the performance of the funds underlying the default arrangements and the self-select funds, with the support of the Investment Adviser. These reviews have concluded that all funds performed broadly in line with their objectives and remained well rated. The DC Section investments do not carry any performance-related fees.

The Trustee has calculated the investment returns (after charges and transaction costs have been deducted) for example, members invested in the default lifestyle funds and self-select funds, in line with the guidance issued by the Department for Work and Pensions. The returns achieved by different aged members vary due to the lifestyle strategies outlined previously in this Statement. Net investment returns refer to the returns on funds minus all transaction costs and member-borne charges. These returns, as provided by Fidelity, are shown below:

Flexible Lifestyle

Age of member (years)	Investment return p.a. over 5 years (to 31 December 2025)	Investment return p.a. over 3 years (to 31 December 2025)	Investment return over 1 year (to 31 December 2025)
25	10.54%	15.66%	17.77%
45	9.02%	13.15%	14.82%
55	4.72%	8.41%	11.36%

Lump-sum Lifestyle

Age of member (years)	Investment return p.a. over 5 years (to 31 December 2025)	Investment return p.a. over 3 years (to 31 December 2025)	Investment return over 1 year (to 31 December 2025)
25	10.54%	15.66%	17.77%
45	9.02%	13.15%	14.82%
55	4.72%	8.41%	11.36%

Drawdown Lifestyle

Age of member (years)	Investment return p.a. over 5 years (to 31 December 2025)	Investment return p.a. over 3 years (to 31 December 2025)	Investment return over 1 year (to 31 December 2025)
25	10.54%	15.66%	17.77%
45	10.54%	15.66%	17.77%
55	9.02%	13.15%	14.82%

Annuity Lifestyle

Age of member (years)	Investment return p.a. over 5 years (to 31 December 2025)	Investment return p.a. over 3 years (to 31 December 2025)	Investment return over 1 year (to 31 December 2025)
25	10.54%	15.66%	17.77%
45	9.02%	13.15%	14.82%
55	4.72%	8.41%	11.36%

The investment returns (after charges and transaction costs have been deducted) for the self-select funds available to members are shown below:

Fund Name	Investment return p.a. over 5 years (to 31 December 2025)	Investment return p.a. over 3 years (to 31 December 2025)	Investment return over 1 year (to 31 December 2025)
International Equity Investment Fund*	10.54%	15.66%	17.77%
Diversified Investment Fund*	4.72%	8.41%	11.36%
Pre-retirement Fund*	-6.19%	2.76%	5.28%
Cash Fund*	2.86%	4.52%	4.13%
Emerging Markets Fund	4.19%	11.62%	23.54%
Shariah Equity Fund	14.54%	22.57%	11.86%
Inflation-Linked Annuity Target Fund	-9.54%	-1.65%	2.77%
Short Dated Corporate Bond Fund	N/A	N/A	6.46%

Also default arrangements under Regulation 2A of the Occupational Pension Schemes (Investment) Regulations 2005

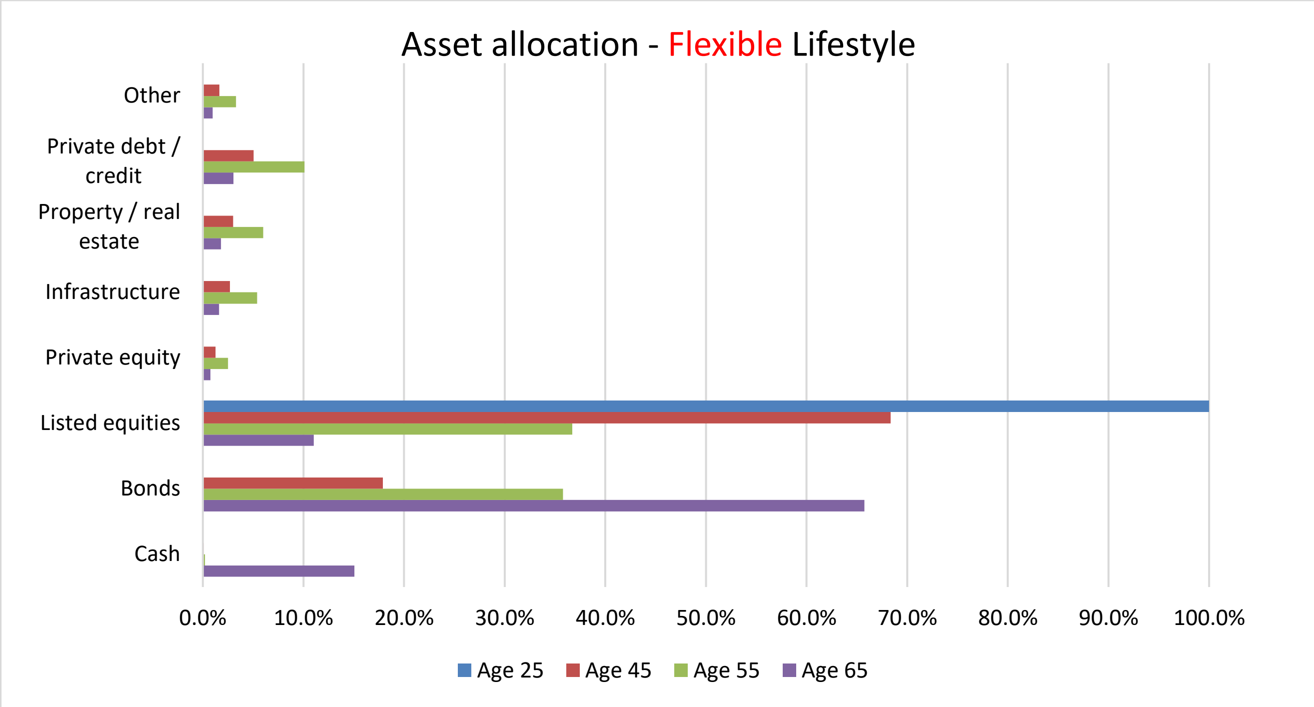
The figures for net investment returns used in the tables above are based on those provided by Fidelity, the DC provider, over the past five years.

Investment asset allocation

The Trustee has calculated the asset allocations, for example members invested in the default arrangements, in line with the guidance issued by the Department for Work and Pensions. The assets allocations vary for different aged members due to the lifestyle strategies outlined previously in this Statement.

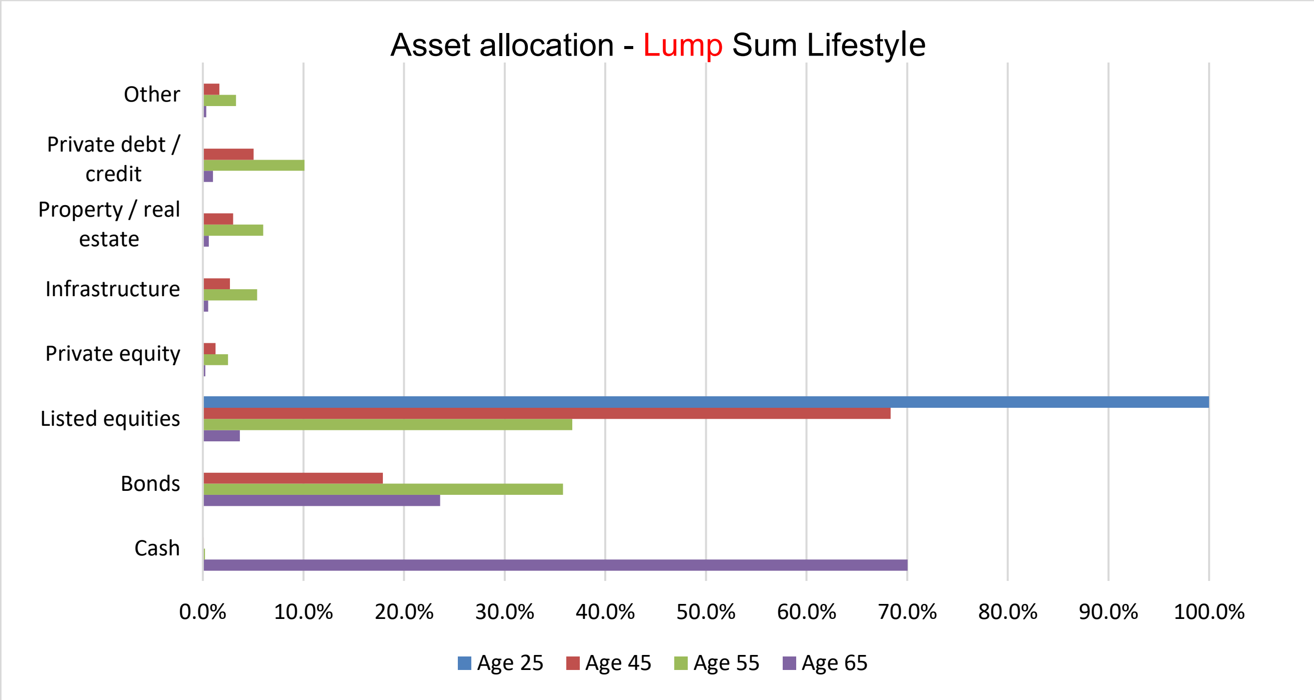
Flexible Lifestyle

Asset class	Percentage allocation			
	25-year-old	45-year-old	55-year-old	65-year-old
Cash	0.0%	0.1%	0.2%	15.1%
Bonds	0.0%	17.9%	35.8%	65.7%
Listed equities	100.0%	68.4%	36.7%	11.0%
Private equity	0.0%	1.3%	2.5%	0.8%
Infrastructure	0.0%	2.7%	5.4%	1.6%
Property / real estate	0.0%	3.0%	6.0%	1.8%
Private debt / credit	0.0%	5.1%	10.1%	3.0%
Other	0.0%	1.7%	3.3%	1.0%
Totals	**100.0%**	**100.0%**	**100.0%**	**100.0%**



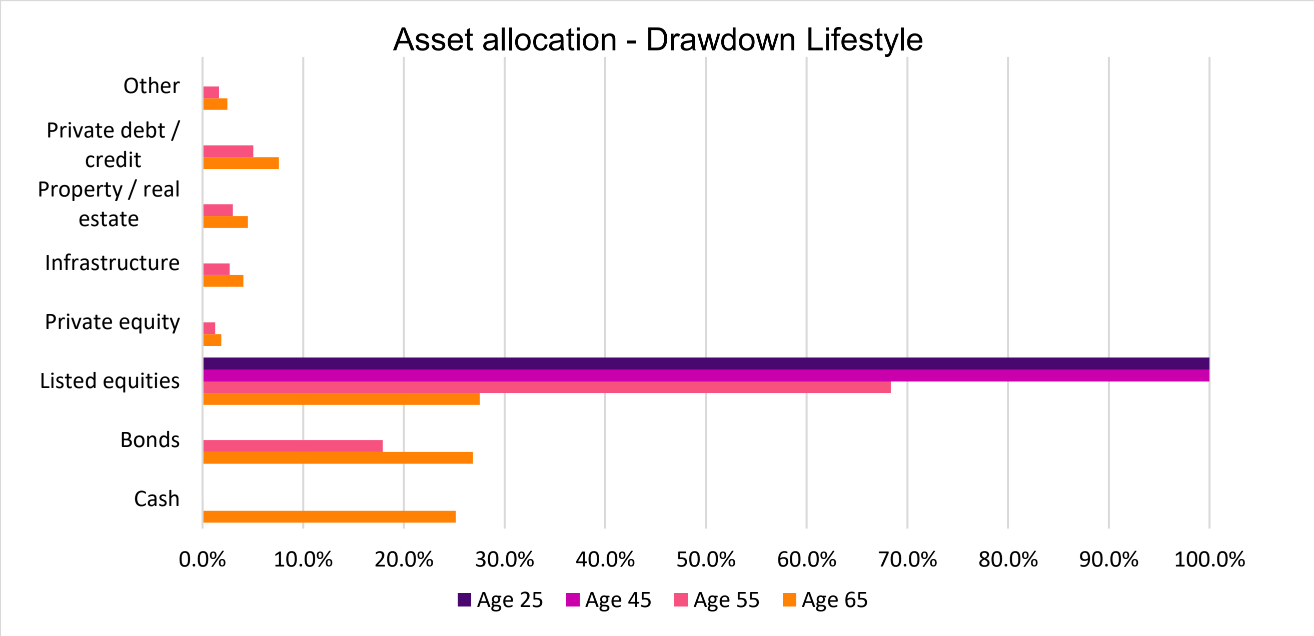
Lump-sum Lifestyle

Asset class	Percentage allocation			
	25-year-old	45-year-old	55-year-old	65-year-old
Cash	0.0%	0.1%	0.2%	70.0%
Bonds	0.0%	17.9%	35.8%	23.6%
Listed equities	100.0%	68.4%	36.7%	3.7%
Private equity	0.0%	1.3%	2.5%	0.3%
Infrastructure	0.0%	2.7%	5.4%	0.5%
Property / real estate	0.0%	3.0%	6.0%	0.6%
Private debt / credit	0.0%	5.1%	10.1%	1.0%
Other	0.0%	1.7%	3.3%	0.3%
Totals	**100.0%**	**100.0%**	**100.0%**	**100.0%**



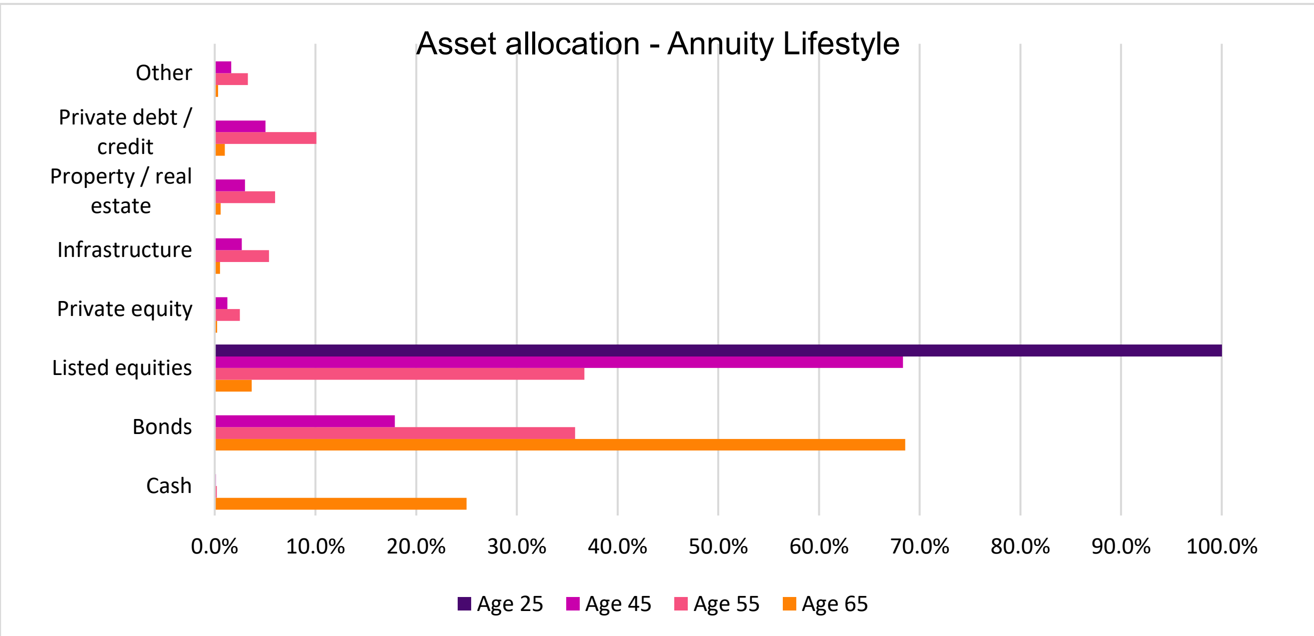
Drawdown Lifestyle

Asset class	Percentage allocation			
	25-year-old	45-year-old	55-year-old	65-year-old
Cash	0.0%	0.0%	0.1%	25.2%
Bonds	0.0%	0.0%	17.9%	26.9%
Listed equities	100.0%	100.0%	68.4%	27.5%
Private equity	0.0%	0.0%	1.3%	1.9%
Infrastructure	0.0%	0.0%	2.7%	4.1%
Property / real estate	0.0%	0.0%	3.0%	4.5%
Private debt / credit	0.0%	0.0%	5.1%	7.6%
Other	0.0%	0.0%	1.7%	2.5%
Totals	**100.0%**	**100.0**	**100.0%**	**100.0%**



Annuity Lifestyle

Asset class	Percentage allocation			
	25-year-old	45-year-old	55-year-old	65-year-old
Cash	0.0%	0.1%	0.2%	25.0%
Bonds	0.0%	17.9%	35.8%	68.6%
Listed equities	100.0%	68.4%	36.7%	3.7%
Private equity	0.0%	1.3%	2.5%	0.3%
Infrastructure	0.0%	2.7%	5.4%	0.5%
Property / real estate	0.0%	3.0%	6.0%	0.6%
Private debt / credit	0.0%	5.1%	10.1%	1.0%
Other	0.0%	1.7%	3.3%	0.3%
Totals	**100.0%**	**100.0%**	**100.0%**	**100.0%**



International Equity, Diversified, Pre-retirement and Cash Funds

	International Equity	Diversified	Pre-retirement	Cash
Cash	0.0%	0.2%	0.0%	100%
Bonds	0.0%	35.8%	100.0%	0.0%
Listed equities	100.0%	36.7%	0.0%	0.0%
Private equity	0.0%	2.5%	0.0%	0.0%
Infrastructure	0.0%	5.4%	0.0%	0.0%
Property / real estate	0.0%	6.0%	0.0%	0.0%
Private debt / credit	0.0%	10.1%	0.0%	0.0%
Other	0.0%	3.3%	0.0%	0.0%
Totals	**100.0%**	**100.0%**	**100.0%**	**100.0%**

Legacy AVC arrangements

AVC assets in the Scheme are invested in a separate Fidelity arrangement which mirrors the funds, terms and conditions of the Scheme's DC Section. At the beginning of 2025, there were also members who had assets invested in legacy AVC arrangements within the Scheme. These were held with Clerical Medical (unit-linked and with profits), Standard Life (with profits only) and Chelsea Building Society (unit-linked). The legacy AVCs were moved to the Fidelity fund range in May 2025. The Trustee and its advisors have used best endeavors to obtain net investment return information for this Chair's Governance Statement**.** The net investment returns, where available, are provided in the tables below as at March 2025.

Unit linked funds

Fund Name	Investment return p.a. over 5 years (to 31 March 2025)	Investment return p.a. over 3 years (to 31 March 2025)	Investment return over 1 year (to 31 March 2025)
Clerical Medical Liquidity Fund (was Halifax Fund)	0.00%	0.00%	0.00%
Standard Life Managed Pension Fund	Not available	Not available	Not available

With Profits Funds

Fund Name	Investment return p.a. over 5 years (to 31 March 2025)	Investment return p.a. over 3 years (to 31 March 2025)	Investment return over 1 year (to 31 March 2025)
Clerical Medical With Profits Fund	4.00%	4.00%	4.01%
Standard Life With-Profits	Not available	Not available	Not available
Standard Life Millennium With-Profits	Not available	Not available	Not available

Standard Life did not provide any Net Investment Return information.

The Trustee also held a Deposit Account policy with Chelsea Building Society. The annual interest rate applied after costs and charges had been deducted decreased from 3.0% in December 2024 to 2.75% in March 2025. The AVC transition to the Fidelity funds completed on 7th May 2025.

During 2024, the Trustee carried out a review of the legacy AVC arrangements in conjunction with its advisers. It was concluded that they were not offering members good value. As such, a project completed during 2025 which transferred all savings in the legacy AVC arrangements into the main Fidelity fund range.

Processing of core financial transactions

Scheme administration for the DC Section, including the processing of financial transactions, is undertaken by the Plan Administrator, Fidelity. Processes adopted by the Plan Administrator to help meet the agreed service levels for processing financial transactions include:

- Full integration between their administration platform and dealing system.
- Electronic checking of financial transactions.
- Straight through processing for the majority of administrative functions.
- "Second set of eyes" checking for manual tasks.

The Trustee has received assurance from the Plan Administrator that core financial transactions have been processed promptly and accurately during the Scheme Year by requiring the Plan Administrator to comply with a service level agreement ("SLA"). Agreed SLAs cover the accuracy and timeliness of all core financial transactions and the Trustee receives quarterly management reports from Fidelity outlining performance against these service standards. In summary, each member case is assigned a service level target for completion of responses to members. The following timescales have been agreed with Fidelity for completion of work items.

Work item	**SLA - days**
Processing contributions	2 days
New accounts	5 days
Non vested leavers	10 days
Retirement cases - All	5 days
Transfers – In and out	5 days
Vested leavers	5 days
Special Communications	30 days

The Trustee regularly monitors the Scheme's core financial transactions against the agreed SLAs. These core financial transactions include the investment of contributions, transfers of assets into and out of the Scheme, fund switches and payments out of the Scheme in respect of members/beneficiaries.

The Trustee, having considered the reports received from the Plan Administrator on a quarterly basis throughout the year, has concluded that there have been no material administration errors in relation to processing core financial transactions (including investment of contributions, transfers in/out, investment switches and payments in and out of the Scheme) and that they have been processed promptly and accurately during the Scheme Year. Assurance has been obtained from the Plan Administrator that adequate internal controls are in place. The Society undertakes a programme of risk-based internal audits which includes the Scheme in their remit and the Trustee works closely with the Society to implement any recommendations for change. As such, the Trustee is satisfied that the Scheme's "core financial transactions" have been processed promptly and accurately during the Scheme year.

Charges and transaction costs

The Trustee has agreed that the charges year for the purposes of the Occupational Pension Schemes (Charges and Governance) Regulations 2015 shall be the same as the Scheme Year. Charges are negotiated by the Trustee with advice from the Investment Adviser.

Within the Scheme, members pay annual management charges plus any additional fund expenses. This is known as the total expense ratio ("TER"). These charges include administration and investment costs which are met by the members.

The current annual investment charges for the DC Section funds available for selection by members during the year to 31 December 2025 are set out below:

Fund name	TER %/£ cost per £1,000 invested	2025 Transaction Costs
International Equity Investment Fund*	0.316% / £3.16	0.05%
Diversified Investment Fund*	0.39% / £3.90	0.05%
Pre-retirement Fund*	0.313% / £3.13	0.00%
Cash Fund*	0.32% / £3.20	0.01%
Emerging Markets Fund	0.32% / £3.20	0.00%
Shariah Equity Fund	0.38% / £3.80	0.01%
YBS Inflation-Linked Annuity Target Fund	0.313% / £3.13	0.00%
YBS Short Dated Corporate Bond Fund*	0.37% / £3.70	0.15%

Source: Fidelity

** The default lifestyle invests in these five funds. Four of these funds are also default arrangements in their own right.*

The TER provides investors with details of the total annual costs involved in running an investment fund. This includes the annual management charge, plus other explicit charges incurred in administering the fund (these include share registration fees, legal fees, auditor, custodian fees etc.). Transaction costs are not included as they are not explicit costs and so these are shown in a separate column.

Transaction costs and gains are those incurred by fund managers as a result of buying, selling, lending or borrowing; and the underlying transaction costs are reflected in the unit price of each fund. This information has been provided by Fidelity on a basis prescribed by the Financial Conduct Authority and is set out in the table above. Sometimes, transaction costs can be negative. Where this is the case, zero has been used. The Trustee has obtained all transaction cost information for the DC fund range from Fidelity.

The default lifestyle strategies automatically switch the funds where members are invested as they approach their target (or the default) retirement age, meaning the level of charges and transaction costs will vary depending on how close members are to this age. The TER applied to the default arrangement, the Scheme's current default lifestyle strategy, ranged from 0.313% to 0.39% per annum depending on how far a member is from retirement.

The TER applied to all other funds offered by Fidelity (including non-default arrangements) used by Scheme members ranged from 0.313% to 0.39% per annum. This is shown in more detail here: [www.fidelitypensions.co.uk/costs-charges/YORK.](www.fidelitypensions.co.uk/costs-charges/YORK)

Legacy AVC arrangements

The Trustee and its advisors have used best endeavors to obtain transaction costs information for the legacy AVC policies for this Chair's Governance Statement. The charges and transactions costs, where available, are provided in the tables below.

Unit linked funds

Fund	Total annual charge (% pa)	2025 Transaction cost
Clerical Medical Liquidity from 12/2/2025 (was Clerical Medical Halifax Fund)	1.00%	0.00% (to 31st March 2025)
Standard Life Managed Pension Fund	0.675%	0.128% (to 31st March 2025) 0.080% (to 30th June 2025)

With Profits Funds

Fund	Total annual charge (% pa)	2025 Transaction cost
Clerical Medical With Profits Fund	Implicit in bonuses provided	0.19% (to 31st March 2025)
Standard Life With Profits Fund	1.00%*	0.026% (to 31st March 2025) 0.022% (to 30th June 2025)
Standard Life Millennium With Profits Fund	1.00%*	0.041% (to 31st March 2025) 0.036% (to 30th June 2025)

*Deducted from bonuses before they are paid so an implicit charge. This is the nominal declared charge.

The Trustee also held a Deposit Account policy with Chelsea Building Society. The interest rates paid to members annually are paid after any implicit costs and charges have been deducted so no charge information was available. There were no transaction costs applied during the Scheme year.

Illustration of charges and transaction costs

Over a period of time, the charges and transaction costs that are taken out of a member's pension savings can reduce the amount available to the member at retirement. The Department for Work and Pensions has introduced legislation on "Reporting costs, charges and other information: guidance for trustees and managers of occupational pension schemes" to members of trust-based pension schemes that provide money purchase benefits. The Trustee has included a DC Costs and Charges illustration in **Appendix A**, which sets out the cumulative effect over time of the charges and transaction costs on the value of a range of realistic and broadly representative funds (within the default arrangement), fund sizes and contribution rates. As each member has a different amount of savings within the Scheme and the amount of any future investment returns and future costs and charges cannot be known in advance, the Trustee has had to make several assumptions about what these might be.

The link below includes cost and charges information for the full range of available funds within the Scheme's DC section. These illustrations have taken account of the statutory guidance on disclosure charges and are updated quarterly by Fidelity: www.fidelitypensions.co.uk/costs-charges/YORK.

Assessment of Value for Members ("VFM")

The Trustee is committed to ensuring that members receive value for their Scheme membership (i.e. the costs and charges deducted from members' funds and contributions paid provide good value in relation to the benefits and services provided by or on behalf of the Scheme, when compared to the market as evidenced by the findings of the annual VFM report).

In line with the requirements of the Pensions Regulator's General Code of Practice, this assessment considers the extent to which services paid for by members offer good value relative to those costs. It also considers more generally the range and quality of services and benefits associated with Scheme membership, including those benefits provided by the Society.

The Trustee undertook a VFM assessment in April 2026, with support from the Investment Adviser. The assessment looked at three core 'pillars' including:

1. Investment returns
2. Services
3. Costs and charges.

The Trustee considered whether each pillar provided Good value (better than the market average), Fair value (in line with market average) or Poor value (below market average).
Investment returns – When assessing the default strategy the Trustee considered the performance compared to 'off-the-shelf' default investment strategies used by master trust providers, considering the performance achieved by

members at the various stages of their journey. The growth phase of the Scheme's default investment strategy provided returns that were better than the market average over the longer term. However, the decumulation phase returned below average returns. This is an area that the Trustee is planning to review as part of the 2026 triennial investment review. Therefore, overall the Trustee considers that the Scheme offers "good value" on investment returns.

Services– The Trustee identified the key features that good schemes are likely to offer. The Scheme provides 88% of these and as such the Trustee considers that the Scheme offers "good value" services to members, whilst acknowledging that there are some key gaps (such as access to a facilitated drawdown arrangement) that it is looking to address in 2026.

Costs and charges - The benchmarking focused on comparing the Scheme against other WTW own trust-based clients and covers the charges of the growth fund used within the main default strategy. The costs and charges for the Scheme's default growth phase DC fund are 0.32% and assessed as "fair value" when compared to other bundled schemes, albeit the Trustee is aware that other similar sized arrangements in the market are likely to be charging less. As such, the Trustee is looking to improve value for members this year.

It should be noted that when assessing value, this does not necessarily mean the lowest cost or fee. The Trustee considers the overall quality of the services members receive and considers whether the cost of this provides value for money.

The Trustee has concluded that overall, the Scheme provides **"good value"**, i.e. the value provided is better than the value offered by many other pension schemes in the market, although it was acknowledged that there are a few keys areas that the Trustee wishes to address**.** The Trustee is now working through the suggestions to further improve member value with the support of its advisers and the Society.

Trustee Knowledge and Understanding ("TKU")

The Scheme's Trustee Directors are required to maintain appropriate levels of knowledge and understanding to run the Scheme effectively. Each Trustee Director must have, to the degree that is appropriate for the purposes of enabling the individual properly to exercise his or her functions as Trustee Director, knowledge and understanding of the law relating to pensions and trusts and the principles relating to the investment of the assets of occupational pension schemes and the identification, assessment and management of risks and opportunities associated with climate change. Each Trustee Director is also required to be conversant with the Trust Deed and Rules of the Scheme, the Scheme's SIP and any other document recording policy for the time being adopted by the Trustee relating to the administration of the Scheme generally.

The Trustee Board has a broad range of skills and experience in both financial services and in the management of pension schemes. The Trustee has a succession plan in place for Trustee Directors, which considers the need to maintain a wide range of experience and skills on the Board as well as the need to consider diversity in any decision to appoint a new Trustee.

The Trustee has an established TKU process in place, which, together with the advice available to the Trustee from the Scheme's actuaries, investment advisers, lawyers, and auditors, enables the Trustee Directors to properly exercise their functions as Trustee Directors of the Scheme.

The Trustee's approach to meeting the TKU requirements includes (but is not limited to):

- Agreeing training that needs to be undertaken, which is delivered at Trustee meetings, or Sub Committee meetings, where appropriate. Specific Trustee Training events may also be organized by our advisers.
- Assessing legislation and general updates / current pension issues at Trustee meetings with professional advisers (including legal).
- Periodically, reviewing the training needs of the Trustee, with the latest full assessment undertaken in January 2023 and a shorter assessment during 2024.
- Carrying out a Trustee effectiveness survey with the latest results discussed at the meeting in January 2023 and a shorter assessment during 2024.
- For new Trustee Directors, completion of an induction programme, which includes completing tPR's online trustee toolkit within six months of their appointment.
- Attend conferences, seminars and other trustee training events organised by the advisors, investment managers and the professional pensions bodies.

Relevant training undertaken by Trustee Directors is recorded in the Trustee Training Log. This Log is reviewed and updated regularly by all Trustee Directors.

During the period covered by this Statement, DC training received by the Trustee Board included the following:

Topic	Date	Provider
Single Code of Practice	March 2025	WTW
Risk Management Function	March 2025	WTW
Cyber Risk Policy and Response Planning	March 2025	WTW
Hot Topics for Pension Schemes (March 2025)	June 2025	WTW
Surplus Utilisation and Funding Code	September 2025	WTW
General Code and Own Risk Assessment	September 2025	WTW
Default Benefit Solutions	September 2025	WTW
Hot Topics for Pension Schemes (September 2025)	September 2025	WTW
Hot Topics for Pension Schemes (December 2025)	December 2025	WTW

During the period covered by this Statement, training received/attended by individual Trustees also included the following:

Topic	Date	Provider
Own Risk Assessments – Made simple	March 2025	PLSA
DB End Game Update	March 2025	Barnet Waddingham
DB member options in focus	April 2025	Barnet Waddingham
Pensions Dashboard Guidance	April 2025	TPR
Due Diligence Days – Insight Investments and Strategies	April 2025	Insight
Due Diligence Days – AXA Investments and Strategies	April 2025	AXA
Due Diligence Days –PIC investments and strategies	April 2025	PIC
Due Diligence Days –LGIM investments and strategies	April 2025	LGIM
Due Diligence Days –BlackRock investment and strategies	April 2025	BlackRock
Due Diligence Days – HSBC DC investment and strategies	April 2025	HSBC
Risk Management Function - Meeting	May 2025	WTW
Risk Management Function - Workshop	May 2025	WTW
Risk Register and Risk Management Function	August 2025	WTW
YBSPS – Get real: the risks of being paid (exactly) your pension	September 2025	WTW
DLA Piper UK Pensions Briefing (July 2025)	September 2025	DLA Piper
Valuation Training	September 2025	WTW
New DB funding regime (Day 1)	October 2025	XPS
New DB funding regime (Day 2)	October 2025	XPS
Trustee toolkit – introducing pension schemes, the Trustee's role, running a scheme, pensions law, an introduction to investment, how a DB scheme work, funding your DB scheme, DB recover plans, contributions and funding principles, how a DC scheme works, investment in a DC scheme, investment in a DB scheme, pensions scams.	October 2025	TPR
DLA Piper UK Pensions Briefing (October 2025)	November 2025	DLA Piper

In addition, the Chair of Trustees is a professional pension scheme trustee and therefore is an accredited member of the Association of Professional Pension Trustees which requires regular training and adherence to continued professional development of the APPT and any other professional bodies of which he is a member.

For the period covered by this Statement, the TKU requirements were met through a combination of the above and the Trustee is therefore compliant with tPR's DC Codes of Practice 7 and 13. The Trustee is satisfied that it has met the relevant legislative requirements enabling the Board to properly exercise its duties.

Trustee Directors undertook an aggregate of around 185 hours of training during the period covered by this Statement. All training is documented in the Trustee's training log.

All the Trustee Directors are familiar with and have access to the current Scheme governing documentation, including the Trust Deed and Rules (together with any amendments), the SIP and key policies and procedures. In particular, the Trustee refers to the Trust Deed and Rules as part of considering and deciding to make any changes to the Scheme and, where relevant, deciding individual member cases. Examples of the Trustee reviewing the Trust Deed and Rules includes making decisions in relation to individual member cases such as death benefit discretions with consideration to the Trustee's powers under the Trust Deed and Rules. This has helped the Trustee demonstrate compliance with tPR's requirement to have a working knowledge of the Trust Deed and Rules. The review of Trustee documents and policies throughout the Scheme year included: the Scheme's Operational Risk Register (quarterly), and conflicts of interest register (considered at each Trustee meeting) This helped the Trustee with meeting the Pension Regulator's requirement to have a working knowledge of all documents setting out the Trustee's current policies.

The Trustee Directors have also taken advice from specialist pensions, investment, and actuarial advisers (WTW), legal advisers (DLA Piper) and communications advisers (Gallagher), to help them to achieve their objectives and requirements and have used their knowledge and understanding to challenge that advice where appropriate. Adviser appointments are reviewed periodically by the Trustee.

The Trustee Directors are satisfied that their combined knowledge and understanding, coupled with advice from specialist pensions, legal and communications advisers, has enabled them to carry out their functions as trustees of the Scheme properly, and to achieve their goals effectively for the year.

The Scheme has in place a conflicts of interest policy. Trustee Directors record potential conflicts of interest at each Trustee meeting and take appropriate steps to manage these.

Defined Benefit Section

The DB section is closed to new employees and closed to all future benefit accrual with effect from 1 January 2016; however, those who were active members of the Scheme when the Scheme closed retained a 'final salary link' in respect of their final salary benefits.

The Trustee has established governance processes within the DB section of the Scheme across six key areas:

- Risk management;
- Funding and investment;
- Sponsor's (YBS Group) covenant;
- Administration and data processing;
- Member communications; and
- Conflicts, relationships and responsibilities.

The Trustee places good governance and oversight at the core of the DB section's management:

- The Trustee monitors the governance of the DB section of the Scheme at quarterly Audit and Risk Committee meetings and Communication and Administration Committee meetings. The Trustee is committed to maintaining the high standards of governance that members would expect.

- The Trustee regularly monitors the key risks at Trustee meetings, taking into consideration tPR's guidance on Integrated Risk Management. Reports are produced and any action required is discussed and noted at subsequent meetings. A formal review of the Integrated Risk Management Report is undertaken on an annual basis to ensure that the key risks and the risk mitigation plan reflect evolving requirements.

The Trustee has been reviewing its governance processes and procedures in light of the legislative and regulatory changes that form part of the Pensions Regulator's General Code of Practice. As well as considering the impact on Trustee policies, the Trustee has refined its approach to risk management, to more closely align with the requirements of the General Code.

There has been an increased focus and training around improving standards of trusteeship following tPR's developments in this area.

- Administration – the Trustee continues to work with its third-party administrators on overseeing administrative practices, member services and improving member data. Current and recent initiatives include:
    - An annual member existence and tracing exercise.
    - The GMP rectification exercise has been completed.
    - Ongoing monitoring and refinement of current processes for efficient processing of DB transfer requests and improved communications for members considering a transfer. This follows "A Guide to Good Practice" published by the Pensions Administration Standards Association (PASA).
    - Launch of a secure online service which enables members to request quotes online and access their scheme documents in a secure portal.
- In October 2018, the High Court handed down a judgment involving the Lloyds Banking Group's defined benefit pension schemes. The judgment concluded schemes should be amended to equalise pension benefits for men and women in relation to guaranteed minimum pension benefits. In November 2020 the High Court also ruled that pension schemes will need to revisit individual transfer payments made since May 1990. Under the rulings, schemes are required to backdate benefit and transfer out adjustments in relation to GMP equalisation and provide interest on the backdated amounts.

  In 2024 and 2025 the Trustee completed the GMP equalisation calculations for all current Scheme members and, where applicable, made back payments and/or pension adjustments. The final part of the GMP equalisation project is to pay any top-ups due to past transfers out of the Scheme, which have now been calculated for affected cases. The project is expected to be completed in 2026. Members should be aware that completion of this exercise may not lead to a change in benefits payable.

- Preparation for the new requirements from the Pensions Regulator and as a result of the Pensions Act 2021, including work to define the long-term funding and investment plans for the Scheme.

As described on page 2, the Trustee continues to monitor Global events and their impact on both the assets and the liabilities within the Scheme, particularly focusing on the impact on members.

The Trustee works closely with its advisers to understand how ESG factors influence the decisions that it takes. The Trustee is subject to the requirement to produce disclosures in line with the recommendations of the Task Force on Climate related Disclosures ("TCFD"), as transposed into UK law in 2021. The Scheme published its first report in July 2023 (a project for which the Trustee initially established a Working Party but is now monitored by the Investment Sub-Committee) and an updated report is now available to view at the link below.

https://www.ybspensionscheme.co.uk/documents/YBS_TCFD_Report_Jul2025.pdf

As part of the report, the Trustee carries out analysis to understand potential impacts of climate change on the Scheme and its members and will continue to monitor this area as part of its management of the Scheme's risks. The latest analysis was carried out at the end of 2024 and was published as part of the 2025 iteration of the TCFD report.

In November 2018, the Trustee entered into an arrangement with Pension Insurance Corporation whereby a portion of the benefits for current pensioners are covered by an insurance contract (known as a "buy-in"). This exercise helped the Trustee increase the security of members' benefits, whilst also helping manage the risks within the Scheme. Under the buy-in contract, the responsibility for the pension benefits remains with the Scheme.

Following the completion of the 2019 triennial actuarial valuation, the Trustee progressed with a review of the Scheme's DB investments, with the support of its investment adviser, in order to more closely match the Scheme's liabilities and assets, and to protect the improvements in the Scheme's funding position. The Trustee considered the appropriateness of carrying out a further buy-in during the review period and concluded that this was not the right time to do so. This will be considered again as the Scheme matures.

The Trustee remains comfortable with the investment strategy and maintaining a lower level of investment risk and took some strategic actions in 2022 to manage the risks to the Scheme's investments from rising interest rates. The Trustee continues to review the strategy on an ongoing basis. Alongside this, the Trustee also regularly monitors the performance of the funds in which the Scheme is invested, with support from the Investment Adviser, and meets the Scheme's investment managers on an annual basis as part of ongoing due diligence.

The Scheme's most recent actuarial valuation was carried out with an effective date of 31 December 2022 and revealed that there was a surplus of assets of £12.1 million. The next valuation, as at 31 December 2025, is underway.

Signed by the Chair on behalf of the Trustee of the Yorkshire Building Society Pension Scheme

Inder Dhingra

Date: 09 June 2026

Appendix A

Fidelity's DC Cost and Charges Illustrations

The following tables give a summary of the projected fund and the impact of costs and charges up to a normal retirement age of 65. Projected fund values are rounded to the nearest hundred. The illustrations are based on data to 31 December 2025 and provided by Fidelity.

Please note the figures provided below are based on SMPI growth rates (which are prescribed by legislation and based on volatility rates for each asset class, which is how much the prices of the assets have fallen and risen over the previous five years) and not expected invested returns. Further information is provided on page 22.

Example of the effect of costs on an average member's investment in the Flexible Lifestyle default Strategy

Example of the effect of costs on an average member's investments

Effect for a member 50 years prior to target retirement date

Fund value at end of year	Starting fund: £0 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £0pm	
	No costs	After all costs	No costs	After all costs	No costs	After all costs
1	£7,250	£7,230	£46,500	£46,300	£39,200	£39,100
3	£22,500	£22,300	£64,500	£63,900	£42,000	£41,500
5	£38,800	£38,400	£83,700	£82,600	£44,900	£44,100
10	£84,700	£83,100	£137,000	£134,000	£53,100	£51,300
20	£203,000	£195,000	£277,000	£264,000	£74,300	£69,200
30	£361,000	£339,000	£462,000	£430,000	£101,000	£91,300
40	£505,000	£461,000	£625,000	£564,000	£120,000	£103,000
50	£674,000	£599,000	£817,000	£716,000	£142,000	£117,000
	Reduction in yield: 0.4%		Reduction in yield: 0.4%		Reduction in yield: 0.4%	

Effect for a member 40 years prior to target retirement date

Fund value at end of year	Starting fund: £0 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £0pm	
	No costs	After all costs	No costs	After all costs	No costs	After all costs
1	£7,250	£7,230	£46,500	£46,300	£39,200	£39,100
3	£22,500	£22,300	£64,500	£63,900	£42,000	£41,500
5	£38,800	£38,400	£83,700	£82,600	£44,900	£44,100
10	£84,700	£83,100	£137,000	£134,000	£53,100	£51,300
20	£198,000	£191,000	£271,000	£258,000	£72,700	£67,600
30	£312,000	£292,000	£399,000	£369,000	£86,200	£76,900
40	£447,000	£408,000	£549,000	£495,000	£101,000	£87,200
	Reduction in yield: 0.4%		Reduction in yield: 0.4%		Reduction in yield: 0.4%	

Other defaults

The table of fund costs shows the charges that apply to the various investment options available to you through the pension Scheme and the illustrations shows how they could affect the growth of a pension plan.

Further information on your investment options can be found within the Scheme literature and fund factsheets. These can be found online at www.planviewer.co.uk. Further notes and assumptions used for these illustrations can be found further down the page.

International Equity Investment Fund

Fund value at end of year	Starting fund: £0 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £0pm	
	No costs	After all costs	No costs	After all costs	No costs	After all costs
1	£7,250	£7,230	£46,500	£46,300	£39,200	£39,100
3	£22,500	£22,300	£64,500	£63,900	£42,000	£41,500
5	£38,800	£38,400	£83,700	£82,600	£44,900	£44,100
10	£84,700	£83,100	£137,000	£134,000	£53,100	£51,300
20	£203,000	£195,000	£277,000	£264,000	£74,300	£69,200
30	£369,000	£346,000	£473,000	£440,000	£104,000	£93,500
40	£601,000	£551,000	£746,000	£677,000	£145,000	£126,000
50	£925,000	£827,000	£1,120,000	£998,000	£203,000	£170,000
	Reduction in yield: 0.4%		Reduction in yield: 0.4%		Reduction in yield: 0.4%	

Diversified Investment Fund

Fund value at end of year	Starting fund: £0 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £0pm	
	No costs	After all costs	No costs	After all costs	No costs	After all costs
1	£7,170	£7,150	£45,700	£45,500	£38,500	£38,300
3	£21,800	£21,600	£61,500	£60,800	£39,600	£39,100
5	£36,900	£36,500	£77,800	£76,500	£40,800	£39,900
10	£76,600	£74,900	£120,000	£117,000	£43,900	£42,000
20	£165,000	£158,000	£216,000	£204,000	£50,800	£46,600
30	£267,000	£250,000	£326,000	£301,000	£58,700	£51,600
40	£386,000	£352,000	£454,000	£409,000	£67,900	£57,200
50	£523,000	£465,000	£602,000	£528,000	£78,500	£63,400
	Reduction in yield: 0.4%		Reduction in yield: 0.4%		Reduction in yield: 0.4%	

Pre-Retirement Fund

Fund value at end of year	Starting fund: £0 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £0pm	
	No costs	After all costs	No costs	After all costs	No costs	After all costs
1	£7,250	£7,230	£46,500	£46,400	£39,200	£39,100
3	£22,500	£22,300	£64,500	£64,000	£42,000	£41,600
5	£38,800	£38,400	£83,700	£82,700	£44,900	£44,200
10	£84,700	£83,300	£137,000	£134,000	£53,100	£51,500
20	£203,000	£196,000	£277,000	£266,000	£74,300	£69,800
30	£369,000	£349,000	£473,000	£444,000	£104,000	£94,700
40	£601,000	£557,000	£746,000	£685,000	£145,000	£128,000
50	£925,000	£838,000	£1,120,000	£1,010,000	£203,000	£174,000
	Reduction in yield: 0.3%		Reduction in yield: 0.3%		Reduction in yield: 0.3%	

Cash Fund

Fund value at end of year	Starting fund: £0 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £0pm	
	No costs	After all costs	No costs	After all costs	No costs	After all costs
1	£7,100	£7,080	£44,900	£44,700	£37,800	£37,600
3	£21,100	£21,000	£58,600	£58,100	£37,400	£37,000
5	£35,100	£34,800	£72,200	£71,300	£37,000	£36,400
10	£69,400	£68,300	£105,000	£103,000	£36,100	£34,900
20	£135,000	£131,000	£170,000	£163,000	£34,400	£32,200
30	£198,000	£189,000	£231,000	£218,000	£32,800	£29,600
40	£258,000	£242,000	£289,000	£269,000	£31,200	£27,300
50	£315,000	£291,000	£345,000	£316,000	£29,700	£25,100
	Reduction in yield: 0.3%		Reduction in yield: 0.3%		Reduction in yield: 0.3%	

Other funds

Shariah Equity Fund

Fund value at end of year	Starting fund: £0 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £0pm	
	No costs	After all costs	No costs	After all costs	No costs	After all costs
1	£7,250	£7,230	£46,500	£46,300	£39,200	£39,100
3	£22,500	£22,300	£64,500	£63,900	£42,000	£41,500
5	£38,800	£38,400	£83,700	£82,500	£44,900	£44,000
10	£84,700	£83,000	£137,000	£134,000	£53,100	£51,100
20	£203,000	£194,000	£277,000	£263,000	£74,300	£68,800
30	£369,000	£345,000	£473,000	£438,000	£104,000	£92,700
40	£601,000	£547,000	£746,000	£672,000	£145,000	£124,000
50	£925,000	£820,000	£1,120,000	£988,000	£203,000	£168,000
	Reduction in yield: 0.4%		Reduction in yield: 0.4%		Reduction in yield: 0.4%	

YBS Inflation-Linked Annuity Target Fund

Fund value at end of year	Starting fund: £0 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £0pm	
	No costs	After all costs	No costs	After all costs	No costs	After all costs
1	£7,280	£7,270	£46,900	£46,800	£39,600	£39,500
3	£22,800	£22,700	£66,000	£65,500	£43,200	£42,800
5	£39,700	£39,400	£86,800	£85,800	£47,100	£46,300
10	£89,100	£87,600	£147,000	£144,000	£58,300	£56,500
20	£226,000	£218,000	£315,000	£302,000	£89,700	£84,200
30	£436,000	£412,000	£574,000	£537,000	£137,000	£125,000
40	£759,000	£701,000	£971,000	£888,000	£211,000	£186,000
50	£1,250,000	£1,130,000	£1,580,000	£1,410,000	£325,000	£278,000
	Reduction in yield: 0.3%		Reduction in yield: 0.3%		Reduction in yield: 0.3%	

Lump Sum Lifestyle Strategy

Effect for a member 50 years prior to target retirement date

Fund value at end of year	Starting fund: £0 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £0pm	
	No costs	After all costs	No costs	After all costs	No costs	After all costs
1	£7,250	£7,230	£46,500	£46,300	£39,200	£39,100
3	£22,500	£22,300	£64,500	£63,900	£42,000	£41,500
5	£38,800	£38,400	£83,700	£82,600	£44,900	£44,100
10	£84,700	£83,100	£137,000	£134,000	£53,100	£51,300
20	£203,000	£195,000	£277,000	£264,000	£74,300	£69,200
30	£361,000	£339,000	£462,000	£430,000	£101,000	£91,300
40	£505,000	£461,000	£625,000	£564,000	£120,000	£103,000
50	£656,000	£583,000	£794,000	£697,000	£138,000	£114,000
	Reduction in yield: 0.4%		Reduction in yield: 0.4%		Reduction in yield: 0.4%	

Effect for a member 40 years prior to target retirement date

Fund value at end of year	Starting fund: £0 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £600pm		Starting fund: £38,000 Future contribution: £0pm	
	No costs	After all costs	No costs	After all costs	No costs	After all costs
1	£7,250	£7,230	£46,500	£46,300	£39,200	£39,100
3	£22,500	£22,300	£64,500	£63,900	£42,000	£41,500
5	£38,800	£38,400	£83,700	£82,600	£44,900	£44,100
10	£84,700	£83,100	£137,000	£134,000	£53,100	£51,300
20	£198,000	£191,000	£271,000	£258,000	£72,700	£67,600
30	£312,000	£292,000	£399,000	£369,000	£86,200	£76,900
40	£435,000	£397,000	£534,000	£482,000	£99,000	£84,900
	Reduction in yield: 0.4%		Reduction in yield: 0.4%		Reduction in yield: 0.4%	

From 1 October 2023 the regulations changed to improve the calculation method of the assumptions we use to calculate estimated growth. All pension schemes, including Fidelity, now use growth rates that are based on how fast the value of a fund goes up and down over the previous five years, this is known as volatility. Where fund data is not available for the past 5 years, we have used another fund. The above estimated rates show how different funds might grow (before adjustments for inflation). The growth rate assumptions to be used are either 2%, 4%, 6% or 7% depending on the investment funds' volatility. Inflation is assumed to be 2.5 % each year, and the figures in the illustrations above are shown in real terms. This means we work out what the estimated growth rate of the fund will be allowing for the impact of inflation.

Fidelity's further notes and assumptions

1. Projected pension fund values are shown in today's terms and do not need to be reduced further for the effect of future inflation.
2. Inflation is assumed to be 2.5 % each year.
3. For Lifestyle Strategies and Target Date Funds the projections take into account the changing proportion invested in the different underlying funds over time and the growth rates may be a blend of those shown above.
4. Any data used within the illustrations is the data held as at the last quarter end.
5. Where on-going contributions are assumed, these increase in line with inflation each year.
6. Illustrations have been shown using a range of starting fund values and future contribution levels.
7. The starting fund value used in the projections is representative of the average for this Scheme based on all members having holdings in the scheme (subject to a minimum of £1 000).
8. The future contribution used in the projections is representative of the average for this Scheme based on the number of members currently contributing into the Scheme (subject to a minimum of £100).
9. Funds and Strategies displayed are those that were available within the Scheme as at the end of the last quarter (please note these may not be available for selection). Any new fund(s) introduced during the quarter will only be displayed as from the start of the next quarter.
10. There may be more than one lifestyle strategy or fund defined as a default arrangement by law but only one is shown as the default investment choice. Where there are different strategies in place for different contribution types, unless specified by the Scheme, the default will be determined by the company contribution in the first instance.
11. If the underlying fund provider(s) has not provided transaction costs, then projections have been made using just the available Total Expense Ratio figure.
12. The projections assume that no withdrawals are made prior to Scheme Pension Age.