

FUJIFILM UK LIMITED PENSION AND  
LIFE ASSURANCE SCHEME  
STATEMENT OF INVESTMENT  
PRINCIPLES

APRIL 2026

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# 1 INTRODUCTION

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This Statement of Investment Principles (“the Statement”) has been prepared by the Trustees of the FUJIFILM UK Limited Pension and Life Assurance Scheme (“the Scheme”) in accordance with Section 35 of the Pensions Act 1995, as amended, and its attendant Regulations.

The Statement outlines the principles governing the investment policy of the Scheme and the activities undertaken by the Trustees to ensure the effective implementation of these principles.

In preparing the Statement, the Trustees have:

- obtained and considered written advice from a suitably qualified individual, employed by their Investment Adviser, Mercer Limited (“Mercer”), whom they believe to have a degree of knowledge and experience that is appropriate for the management of their investments; and
- consulted with the Sponsoring Employer, although they affirm that no aspect of their strategy is restricted by any requirement to obtain the consent of the Sponsoring Employer.

The advice and the consultation process considered the suitability of the Trustees’ investment policy for the Scheme.

The Scheme is Exempt Approved and consists of two sections: the Final Salary/Defined Benefit (“DB”) Section and the Money Purchase/Defined Contribution (“DC”) Section.

The Trustees will review the Statement formally at least every three years to coincide with the triennial Actuarial Valuation or other actuarial advice relating to the statutory funding requirements. Furthermore, the Trustees will review the Statement without delay after any significant change in investment policy. Any changes made to the Statement will be based on written advice from a suitably qualified individual and will follow consultation with the Sponsoring Employer.

# 2 INVESTMENT OBJECTIVES

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## DB Section

After consultation with the Sponsoring Employer, the Trustees' objective is to implement a low risk investment strategy ahead of a buy-in of the Scheme's liabilities with an insurance company. In doing so, the Trustees have aligned the Scheme's investment strategy with Mercer's solvency basis (a proxy buy-in/out basis) and targeted interest and expected inflation rate hedge ratios of c.100% on this basis.

The Scheme Actuary has advised that the expected return of the investment strategy is lower than that assumed in the Technical Provisions assumptions agreed for the actuarial valuation. However, that is of secondary concern in the scenario where an insurance transaction is scheduled, with the Sponsoring Employer addressing the shortfall. In the event that the proposed insurance transaction does not take place, a further review of the investment objectives will be required, in conjunction with an understanding of the Sponsoring Employer covenant.

## DC Section

The Trustees aim to provide suitable investment options that are aligned to the needs of their members.

The Trustees recognise that in a defined contribution arrangement, members assume the investment risks themselves. The Trustees further recognise that members are exposed to different types of risk at different stages of their working lifetimes. Broadly speaking, the Trustees have identified eight main types of investment risk, as noted below:

- Investment-Return Risk - the risk is that a member is invested in those asset classes that are expected to generate the highest returns over the long run however they may not do so in practice.
- Volatility risk - the risk that the value of a member's pot will fluctuate substantially over the investment term. Higher volatility over the investment term can give rise to potential wider range of possible outcomes for members around the expected average.
- Annuity-Rate Risk - the risk is that, when close to retirement, a member has not invested the part of his/her fund that will be used to purchase a pension in those asset classes (principally bonds), which protect against annuity-rate movements.
- Capital-Stability Risk - the risk is that, when close to retirement, a member has invested the part of his/her fund that will be used to provide a cash sum in asset classes that are subject to volatility in capital-value terms.
- Market-Switching Risk - the risk arises if there is to be switching between investment vehicles. The risk is that large investment switches are made at one point in time, thereby unnecessarily exposing members to unfavourable market pricing on a particular day.
- Inflation Risk - the risk that a member's investments will not grow quickly enough to sufficiently outpace inflation (the cost of living).
- Foundation Risk - this is the risk that capital value losses in early years could potentially discourage members from saving.
- Liquidity Risk – the risk that the Scheme's assets cannot be realised at short notice in line with member demand.

The Trustees have determined their investment policy in such a way as to address the above risks.

The Trustees are mindful of their responsibility to provide members with an appropriate range of investment funds and a suitable default lifestyle strategy.

Details of the approach the Trustees have taken to meet these investment objectives are set out in Section 4.

Details of the Trustees' key investment principles in respect of the default strategy are set out in Appendix 2. The

Trustees will review the investment approach from time to time and make changes as and when it is considered appropriate.

# 3 INVESTMENT RESPONSIBILITIES

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## 3.1 TRUSTEES' DUTIES AND RESPONSIBILITIES

The Trustees are responsible for setting the investment objectives and determining the strategy to achieve the objectives. They carry out their duties and fulfil their responsibilities as a single body.

The duties and responsibilities of the Trustees include, but are not limited to, the following tasks and activities:

- The regular approval of the content of the Statement
- The appointment and review of the investment managers, Investment Adviser and investment platform provider
- The assessment and review of the performance of each investment manager
- The choice of appropriate managers/funds to implement the agreed investment strategy
- The assessment of the risks assumed by the Scheme at total scheme level and on a manager by manager basis
- The approval and review of the asset allocation benchmark for the Scheme
- The compliance of the investment arrangements with the principles set out in the Statement

## 3.2 INVESTMENT ADVISER'S DUTIES AND RESPONSIBILITIES

The Trustees have appointed Mercer as the Investment Adviser to the Scheme. Mercer provides advice as and when the Trustees require it, as well as raising any investment-related issues, of which it believes the Trustees should be aware. Matters on which Mercer expects to provide advice to the Trustees include the following:

- Setting of investment objectives
- Determining investment strategy and asset allocation
- Determining an appropriate investment structure
- Advising the Trustees in relation to funds and investment managers that are suitable to meet the Trustees' objectives
- Monitoring the investment managers to ensure their continuing appropriateness to the mandates given
- Monitoring the Platform provider to ensure its continuing appropriateness for the Scheme
- Setting cashflow management (investment and withdrawal) policies (see Appendix 3)

The Trustees may seek advice from Mercer with regard to both strategic and tactical investment decisions (see Section 4 - Investment Strategy); however, they recognise that they retain responsibility for all such decisions, including those that concern investments and disinvestments relating to cashflows (see Appendix 3). Mercer may be proactive in advising the Trustees regarding tactical investment decisions; however, there is no responsibility placed on Mercer to be proactive in all circumstances.

Mercer provides regular six-monthly reporting to monitor the performance of the Scheme's investment managers against their benchmarks.

Mercer will also advise the Trustees of any significant developments of which it is aware relating to the investment managers, or funds managed by the investment managers in which the Scheme is invested, such that in its view there exists a significant concern that any of these funds will not be able to meet their long-term objectives.

Mercer also monitors the performance of the Scheme's assets at an aggregate level in relation to the Scheme's liabilities to assess the success, or otherwise, of the Trustees' investment strategy.

Mercer makes a fund based charge for the services specified within the Implemented Investment Consultancy Services Agreement.

Any additional services provided by Mercer will be remunerated primarily on a time-cost basis.

Mercer does not receive commission or any other payments in respect of the Scheme that might affect the impartiality of their advice.

The Trustees believe that this is the most appropriate adviser remuneration structure for the Scheme.

Mercer is authorised and regulated by the Financial Conduct Authority (“FCA”).

### 3.3 ARRANGEMENTS WITH INVESTMENT MANAGERS

The Trustees are long-term investors and do not look to change the investment arrangements on a frequent basis.

The Trustees, after considering appropriate investment advice, invested the Scheme’s DB Section assets via a Trustee Investment Policy (“TIP”) issued by Mobius Life Limited (“Mobius”), whose appointment foregoes the need for a Custodian. The Trustees first invested through the Mobius TIP in March 2024.

Mobius is authorised by the Prudential Regulation Authority (“PRA”) and regulated by the FCA and the PRA.

The Mobius TIP facilitates investment into a range of open-ended pooled funds with no set duration managed by the third party investment managers. The value of the Mobius TIP is directly linked to the change in the value of the funds. All of the underlying investment managers engaged by the Trustees are authorised and regulated by the PRA, FCA or both.

The Trustees will retain an investment manager unless there is a strategic change to the overall strategy that no longer requires exposure to that asset class or manager.

With regard to the DC Section, the Alliance Bernstein Target Date Funds are also invested through the Mobius TIP. The other pooled funds held by the DC Section are invested directly with the investment managers.

All of the DC Section’s invested funds are open-ended with no set end date for the arrangement. The Default Arrangement and fund range are reviewed on at least a triennial basis. A manager’s appointment may be terminated if it is no longer considered to be optimal, or have a place in the default strategy or general fund range.

The Trustees, after considering appropriate investment advice, have appointed professional, authorised investment managers to manage the assets of the Scheme. Investment managers are appointed based on their capabilities and, therefore, their perceived likelihood of achieving the expected return and risk characteristics required for the selected asset class.

The Trustees look to Mercer for their forward-looking assessment of a manager’s ability to outperform over a full market cycle. This view will be based on Mercer’s assessment of the manager’s idea generation, portfolio construction, implementation and business management, in relation to the particular investment fund that the Scheme invests in.

If the investment objective for a particular manager’s fund changes, the Trustees will review the fund appointment to ensure it remains appropriate and consistent with the Trustees’ wider investment objectives.

Information on the funds invested in are set out in Appendix 4.

The Trustees only invest in pooled funds and therefore accept that they cannot specify the risk profile and return targets of the underlying investment managers. However, pooled funds are chosen with appropriate characteristics to align with the overall investment strategy, including the policies set out in this Statement.

The investment managers are responsible for all decisions concerning the selection and de-selection of the individual securities within their funds. In the case of multi-asset mandates, the investment managers are

responsible for all decisions concerning the allocation to individual asset classes and changes in the allocations to individual asset classes.

For the non-buy in assets, the investment managers are remunerated by ad valorem charges based on the value of the assets that they manage on behalf of the Scheme.

None of the investment managers in which the Scheme's assets are invested have performance based fees which could encourage the manager to make short term investment decisions to hit their profit targets.

The Trustees therefore consider that the method of remunerating fund managers is consistent with incentivising them to make decisions based on assessments of medium to long-term financial and non-financial performance of an issuer of debt or equity. By encouraging a medium to long-term view, it will in turn encourage the investment managers to engage with issuers of debt or equity in order to improve their performance in the medium to long-term.

For the DB Section, Mobius is also primarily remunerated by ad valorem charges based on the value of the assets. Discounts have, where possible, been negotiated by Mercer and Mobius with the pooled funds managers on their standard charges and these discounts are passed on in full for the benefit of the Scheme. Mobius also levy a modest, fixed policy fee.

The Trustees accept that they cannot influence the charging structure of the pooled funds in which the Scheme is invested, but are satisfied that the ad-valorem charges for the different underlying funds are clear and are consistent with each fund's stated characteristics.

The Trustees are therefore satisfied that this is the most appropriate basis for remunerating the underlying investment managers and is consistent with the Trustee's policies as set out in this Statement.

### **Buy-In Policy**

The Trustees have secured a buy-in policy with Pension Insurance Corporation Limited ("PIC") to pay to the Scheme an amount equal to the pensions in payment at the time of taking out the policy, together with appropriate pension increases thereafter.

The primary responsibility of PIC is to ensure that the correct amount is paid to the Scheme in respect of these pensions in payment.

PIC's charges for managing the policy were crystallised into the up-front premium that the Trustees paid when securing the policy.

PIC is authorised by the PRA and the FCA.

## **3.4 SUMMARY OF RESPONSIBILITIES**

A summary of the responsibilities of all relevant parties, including the Scheme Actuary and the Scheme administrators, so far as they relate to the Scheme's investments, is set out in Appendix 5.

# 4 INVESTMENT STRATEGY

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## 4.1 SETTING INVESTMENT STRATEGY

### **DB Section**

The Trustees have determined their investment strategy after considering the Scheme's liability profile and requirements of the Statutory Funding Objective, their own appetite for risk, the Sponsoring Employer's appetite for risk, and the strength of the Sponsoring Employer's covenant.

Taking this into consideration, as well as the overall investment objective as set out in Section 2 of this Statement, the Trustees have agreed an investment strategy that aims to achieve the following:

- Stabilise, to a significant extent, the funding position over time on Mercer's solvency basis.
- Hedge c.100% of the illustrative solvency liabilities against movements in interest rates and inflation expectations.

In determining the strategy, the Trustees received written advice from their Investment Adviser.

Taking all these factors into consideration, the Trustees have determined that the investment strategy as set out in Appendix 1 is currently suitable for the Scheme.

In making this decision, the Trustees have been satisfied that this is consistent with their investment objectives and is supported by both the Sponsoring Employer and the Sponsoring Employer's covenant.

In respect of the investment of contributions and any disinvestments to meet member benefit payments, the Trustees have decided on a structured approach as set out in Appendix 3, as well as the policy on rebalancing the assets.

### **DC Section – Default Arrangement**

The Trustees have adopted Target Date Funds ("TDFs") as the Default Arrangement for the DC Section. A TDF is a fund which a member is invested in for the entire duration of their career until their Target Retirement Age ("TRA") is reached. When investing into the default, each member is assigned a TDF vintage that relates to their TRA. In the initial years, a TDF invests in a 'growth phase', which is characterised by investing in riskier assets with a higher expected return profile. As a member approaches retirement, the asset allocation within their respective TDF begins a de-risking phase into assets with a lower expected risk profile. Further details on the TDFs are set out in Appendix 2.

The Trustees also offer members a suitable range of funds as an alternative to the default option. Details of the self-select funds are all set out in Appendix 4.

### **Illiquid Assets**

The Trustees consider illiquid assets as assets of a type which cannot easily or quickly be sold or exchanged for cash; including where such assets are invested as a component of a daily-dealing multi-asset fund. The Default Arrangement includes no direct allocation to illiquid assets. The Default Arrangement invests in TDFs which are multi-asset funds that do not currently invest in any underlying illiquid assets.

The Trustees understand the potential for higher returns and benefits of diversification that illiquid assets can offer relative to more traditional asset classes (such as bonds or equities). While these potential benefits are recognised by the Trustees, they are also aware of the risks associated with illiquid assets given the potential for valuations of illiquid assets to not reflect their true value at a given time, as well as concerns over liquidity management and active manager risk. The Trustees acknowledge illiquid assets are a developing area for

defined contribution pensions schemes and expect the TDF manager to monitor the position closely and continue to evaluate the suitability of such an investment.

In selecting investments for the Default Arrangement, the Trustees use both qualitative and quantitative analysis to consider the expected impact of different strategic allocation mixes on members' projected pension savings. For any future investment, the Trustees will carefully consider whether the investment provides value for members, taking account of the potential for returns and associated risks. It is the Trustees' policy to review the default investment strategy on at least a triennial basis. Such reviews will include whether the incorporation of illiquid investments is appropriate.

## 4.2 INVESTMENT DECISIONS

The Trustees distinguish between three types of investment decision: strategic, tactical and stock level.

### **Strategic Investment Decisions**

These decisions are long-term in nature and are driven by an understanding of the objectives, needs and liabilities of the Scheme.

The Trustees take all such decisions themselves. They do so after receiving written advice from their Investment Adviser and consulting with the Sponsoring Employer. Examples of such decisions and of tasks relating to the implementation of these decisions include the following:

- Setting investment objectives
- Determining the split between the growth and the stabilising portfolios
- Determining the allocation to asset classes within the growth and stabilising portfolios
- Determining the Scheme benchmark
- Reviewing the investment objectives and strategic asset allocation

### **Tactical Investment Decisions**

These decisions are short-term and based on expectations of near-term market movements. Such decisions may involve deviating temporarily from the strategic asset allocation and may require the timing of entry into, or exit from, an investment market or asset class.

These decisions are the responsibility of the Trustees. However, where such decisions are made within a pooled fund, they are the responsibility of the investment manager of the fund.

### **Stock Selection Decisions**

All such decisions are the responsibility of the investment managers of the pooled funds in which the Scheme is invested.

## 4.3 TYPES OF INVESTMENTS TO BE HELD

The Trustees are permitted to invest across a wide range of asset classes.

Details relating to the pooled funds in which the Scheme is invested can be found in Appendix 4.

The Trustees note that the actuarial value of the DB Section's future benefits payments to members is sensitive to changes in long term interest rates and long-term inflation expectations. The Trustees have therefore decided to invest in pooled funds containing gilts, index-linked gilts and corporate bonds with the intention that the Scheme's assets respond in a similar way to changes in these factors and reduce the volatility of the Scheme's funding position. This is referred to as hedging.

The Trustees have also undertaken a buy-in with PIC which will pay to the Scheme an amount equivalent to the pensions for the pensioners at the time of taking out the policy, and their dependants as appropriate.

For the DC Section, the Trustees recognise the benefits of diversification across asset classes, as well as within them, in reducing the risk that results from investing in any one particular market. They note that it would not be practical (or appropriate) for them to commit the resources necessary to make these decisions across a wide range of asset classes themselves.

The Trustees have therefore invested in pooled Target Date Funds, whose manager selects and manages allocations across a diversified spectrum of assets based on the target date of the specific fund.

The self-select fund range allows the members to invest in the following:

- UK and Overseas Equities. Including Emerging Market Equities
- UK Government Bonds, Fixed and Inflation-linked.
- Corporate Bonds
- Property
- Diversified Growth
- Cash

The use of derivatives is as permitted by the guidelines that apply to the pooled funds.

## 4.4 FINANCIALLY MATERIAL CONSIDERATIONS

The Trustees understand that they must consider all factors that have the ability to impact the financial performance of the Scheme's investments over the appropriate time horizon. This includes, but is not limited to, environmental, social and governance ("ESG") factors.

The Trustees recognise that ESG factors, such as climate change, can influence the investment performance of the Scheme's portfolio and it is therefore in members' and the Scheme's best interests that these factors are taken into account within the investment process.

The Trustees further recognise that investing with a manager which approaches investments in a responsible way and takes account of ESG related risks may lead to better risk adjusted performance results as omitting these risks in investment analysis could skew the results and underestimate the level of overall risk being taken. Therefore, other factors being equal, the Trustees would seek to invest in funds which incorporate ESG principles.

The assets of the DB Section are invested in pooled funds through the Mobius TIP. The Trustees therefore have very limited ability to influence the ESG policies and practices of the companies in which their manager invests. Furthermore, given the Trustees' key objective is to reduce risk relative to the value of the Scheme's liabilities, the Scheme's assets are largely invested in pooled funds containing gilts and index-linked gilts issued by the UK Government, and ESG considerations do not readily apply to these investments.

Mercer's ESG assessment framework considers the relevance of ESG considerations for a particular asset class, and where relevant, whether the manager has integrated ESG considerations into its decision-making process for a particular fund.

For the DB Section, the Trustees receive monitoring reports on a semi-annual basis which include an ESG assessment provided by the Investment Adviser in relation to the funds in which the Scheme is invested and will monitor how these develop over time.

If a new investment manager is selected, the Trustees would consider Mercer's ESG assessment for the new fund as part of their decision-making process.

In considering the investments for the DC Section, the Trustees are satisfied that funds in the Default Arrangement and the self-select options take a responsible approach to voting and engaging with the companies they invest in to encourage a responsible approach to ESG factors.

The Trustees will update this Statement to reflect any developments as appropriate.

The Trustees are therefore satisfied that ESG factors are appropriately reflected in the overall investment approach.

## 4.5 NON - FINANCIAL CONSIDERATIONS

The Trustees' objective is that the financial interests of Scheme members are their first priority when choosing investments.

They have decided not to consider non-financial considerations, or to take members' preferences into account when setting the investment strategy.

## 4.6 STEWARDSHIP

The Scheme's assets are invested in pooled funds, and the Trustees therefore have no direct voting rights or ability to engage directly with the investee companies.

For the DB Section, the majority of assets are invested in bond based or money market pooled funds. There are therefore no voting rights in relation to these investments.

Furthermore, the DB Section is mostly invested in pooled funds containing gilts and index-linked gilts issued by the UK government. There is therefore very limited ability to influence behaviour by engagement.

The Trustees' policy is to invest with investment managers where responsible investment is embedded appropriately in their approach to investment. The investment managers have responsibility for engaging with, and monitoring investee companies following their responsible investment policies, so as to act in the long term financial interest of investors.

Information on the investment managers approaches to responsible investment, voting and engagement with the investee companies is available online:

<https://am.landg.com/en-uk/institutional/responsible-investing/>

<https://www.newtonim.com/uk-institutional/responsible-investment/>

<https://www.alliancebernstein.com/corporate/en/corporate-responsibility/responsible-investing/>

The Trustees also note that all the Scheme's investment managers are signatories of the UK Stewardship Code.

The Trustees monitor the engagement of the investment manager annually, as part of the production of the Implementation Statement.

Where the Trustees are specifically invited to vote on a matter relating to corporate policy, they will exercise their right in accordance with what they believe to be the best interests of the majority of the Scheme's membership.

The Trustees have identified that climate change, human rights and diversity, equity and inclusion are their most important stewardship priorities. The Trustees monitor the key voting activity of their investment managers on these areas as part of the annual Implementation Statement.

The Trustees will review their stewardship priorities from time to time, although this Statement would not be updated solely in relation to a change of priorities.

Taking all the above into consideration, the Trustees are satisfied that stewardship and responsible investment is embedded appropriately in the investment managers' approach to investing.

# 5 RISK

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Under the Pensions Act 2004, the Trustees are required to state their policy regarding the ways in which risks are to be measured and managed. These are set out below.

## 5.1 SOLVENCY RISK AND MISMATCHING RISK

- These are measured through a qualitative and quantitative assessment of the expected development of the assets relative to the DB Section's liabilities.
- These are managed by setting a scheme-specific strategic asset allocation with an appropriate level of risk.

## 5.2 MANAGER RISK

- This is assessed as the expected deviation of the prospective risk and return, as set out in the managers' objectives, relative to the investment policy.
- It is measured by monitoring the actual deviation of returns relative to the objective and factors supporting the managers' investment process.
- It is also managed through investment primarily in passively managed funds and by using the Mobius platform for the DB Section, which enables quick and efficient replacement of managers if appropriate.
- In relation to the buy-in policy, the Trustees will monitor the position to ensure that PIC continues to make the appropriate payments to the Scheme in respect of the specified members and their dependants on a timely basis.

## 5.3 LIQUIDITY RISK

- This is monitored according to the level of cashflows required by the Scheme over a specified period.
- It is managed by holding an appropriate amount of readily realisable investments. The Scheme's assets are invested in daily dealing, liquid pooled funds which are readily realisable.
- The buy-in policy is a contract of insurance to pay to the Scheme an amount equivalent to the pensions at the time of taking out the policy, and their dependants. It is not readily realisable.
- Members of the DC Section invest in a range of daily dealt and daily priced pooled investment vehicles that facilitate the availability of assets to meet benefits outflows.

## 5.4 POLITICAL RISK

- This is measured by the level of concentration in any one market leading to the risk of adverse influence on investment values arising from political intervention.
- It is managed by regular reviews of the investments and through investing in funds which give a wide degree of diversification.

## 5.5 SPONSOR RISK

- This is assessed as the level of ability and degree of willingness of the sponsor to support the continuation of the Scheme and to make good any current or future deficit.
- It is managed by assessing the interaction between the Scheme and the sponsor's business, as measured by a number of factors, including the creditworthiness of the sponsor and the size of the pension liability relative to the sponsor. Regular updates on employer covenant are provided to the Trustees by senior staff of the sponsor.
- It is also managed by setting a low-risk investment strategy which minimises the reliance on the sponsor.

## 5.6 LEGISLATIVE RISK

- This is the risk that legislative changes will require action from the Trustees so as to comply with any such changes in legislation.
- The Trustees acknowledge that this risk is unavoidable but will seek to address any required changes so as to comply with changes in legislation.

## 5.7 CREDIT RISK

- This is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation.
- The Scheme invests in pooled investment vehicles and is therefore directly exposed to credit risk in relation to the pooled investment vehicles and is indirectly exposed to credit risks arising on the financial instruments held by the pooled investment vehicles.
- Direct credit risk arising from pooled investment vehicles is mitigated by the underlying assets of the pooled arrangements being ring-fenced from the pooled manager, the regulatory environments in which the pooled managers operate and diversification of investments amongst a number of pooled arrangements.
- The Trustees have invested the DB Section assets via the Mobius TIP. Mobius carries out due diligence checks before making a new pooled fund available, and on an ongoing basis monitors changes to the regulatory and operating environments of the underlying investment managers.
- Indirect credit risk arises in relation to underlying bond investments held in the pooled funds. This risk is mitigated by either investing in funds with diversified portfolios, or in actively managed investment grade funds.
- The Trustees acknowledge that the assessment of credit risk on individual debt instruments is delegated to the investment manager, and have therefore invested in corporate bond funds with investment grade benchmarks.

## 5.8 MARKET RISK

- This is the risk the fair value of future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk comprises of the following three types of risk:

### CURRENCY RISK

- This is the risk that occurs when the price of one currency moves relative to another (reference) currency. In the context of a UK pension scheme, the scheme may be invested in overseas stocks or assets, which are either directly or indirectly linked to a currency other than Sterling. There is a risk that

the price of that overseas currency will move in such a way that devalues that currency relative to Sterling, thus negatively impacting the overall investment return.

- The DB Section's assets are invested in UK denominated funds to mitigate currency risk.
- The strategy of the Default Arrangement is set with the intention of diversifying these risks to reach a level of risk deemed appropriate.

## INTEREST RATE / INFLATION RISK

- This is the risk that an investment's value will change due to a change in the level of interest rates. This affects debt instruments more directly than growth instruments.
- The Trustees recognise that the DB Section's liabilities are exposed to a significant level of interest rate and inflation risk movement and for this reason it is desirable for the Scheme's assets to be exposed to a similar level of interest rate and inflation risk and the Trustees have invested in gilt, index linked gilt and a corporate bond funds to manage this risk.
- The Trustees acknowledge that the interest rate and inflation risk related to individual debt instruments is managed by the investment managers through a combination of strategies, such as diversification, duration and yield curve management.
- For the DC Section, TDFs will have bond exposure for members seeking to purchase an annuity and manage their interest rate risk.

## OTHER PRICE RISK

- This is the risk of volatility in fund values and that principally arises in relation to return seeking assets.
- In the DB Section this risk has been mitigated by investing solely in bond assets.
- For the DC Section, the Trustees have put in place TDFs as the Default Arrangement to reduce other price risk as a member approaches retirement. Members also have access to a range of self-select funds which offer the opportunity to select a different level of risk if appropriate to their circumstances.

## 5.9 ESG RISK

- This is the risk that Environmental, Social or Corporate Governance concerns, including climate change, have a financially material impact on the return of the Scheme's assets.
- The Trustees manage this risk by investing in well-respected investment managers where ESG principles are an established part of the investment decision making process, by regularly reviewing the Investment Adviser's ESG assessment of the Scheme's managers and by considering ESG on an annual basis to make sure that emerging trends and new information are taken into account as appropriate.

# 6 MONITORING OF INVESTMENT ADVISER AND MANAGERS

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## 6.1 INVESTMENT ADVISER

The Trustees continually assess and review the performance of their adviser in a qualitative way and undertake a formal review annually. In doing so, the Trustees consider the objectives they set for the investment adviser, which they review on an ongoing basis and at least every three years.

## 6.2 INVESTMENT MANAGERS

The Trustees receive monitoring reports on the performance of the underlying investment managers from Mercer on a semi-annual basis, which presents performance information over 6 months, 1 year and 3 years. The reports show the absolute performance and performance against the manager's stated target performance (over the relevant time period) on a net of fees basis. They also provide returns of market indices so that these can also be used to help inform the assessment of the underlying managers' performance.

The reporting also reviews the performance of the Scheme's assets in aggregate against the Scheme's strategic benchmark.

In relation to the buy-in policy, the Trustees have put in place a process to monitor that PIC continues to make the appropriate payments to the Scheme on a timely basis.

For the DC Section, the Trustees receive reporting from the investment managers.

## 6.3 PORTFOLIO TURNOVER COSTS

For the DB Section, the Trustees do not currently monitor portfolio turnover costs for the funds in which the Scheme is invested, although note that the performance monitoring which they receive is net of all charges, including such costs. For the DC Section, the Trustees consider portfolio turnover costs as part of the annual value for members assessment and ask investment managers to include portfolio turnover and turnover costs in their presentations and reports to the Trustees. Portfolio turnover costs are the costs incurred as a result of the buying, selling, lending or borrowing of investments.

The Trustees are also aware of the requirement to define and monitor targeted portfolio turnover and turnover range.

Given that the Scheme invests in a range of pooled funds, many of which invest across a wide range of asset classes, the Trustees do not have an overall portfolio turnover target for the Scheme and are satisfied that this is appropriate.

# 7 ADDITIONAL VOLUNTARY CONTRIBUTIONS (AVCS)

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The Trustees have made AVC facilities available for members and review the AVCs from time to time to ensure that they remain suitable for member's needs.

Members have the facility to invest their AVCs within the funds in the Default Arrangement and the self-select range, and can choose which of the available funds to invest in.

The Trustees are satisfied that this is a suitable mix of funds to provide for differing member requirements.

With effect from 1 April 2005, the Trustees ceased the option for members to invest their AVCs with Phoenix Life. With effect from 9 February 2009, it was agreed that new entrants will no longer have the option to invest their AVCs with Standard Life, although former members can continue to contribute to the existing Standard Life AVC policy.

# 8 CODE OF BEST PRACTICE

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The Trustees note that in March 2024, the Pensions Regulator released the General (single) Code of Practice: <https://www.thepensionsregulator.gov.uk/en/document-library/code-of-practice>, which consolidates 10 previous codes.

The General Code does add some significant new requirements including modules covering climate change, cyber controls and pension scams. It makes explicit the need for effect system of governance (“ESOG”) setting out in detail the expectations around this and confirming this will depend on the size and complexity of the scheme. It also introduces the requirement for schemes with 100 or members to produce an own risk assessment to review how the Scheme’s system of governance is working.

The Trustees receive investment advice in relation to both the DB and DC Sections which ensures that the principles contained within this guidance are applied to the Scheme as far as relevant to its circumstances.

The Investment Advisers for both the DB and DC Sections attend each Trustees’ meeting which enables developments to be monitored, both in relation to the Scheme’s circumstances and in relation to evolving guidance, so that the investment approach can be revised if considered appropriate.

# 9 COMPLIANCE

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This Statement is published on a publicly available web page, and along with the annual report and accounts, is available to members on request.

This Statement, taken as a whole with the Appendices, supersedes all others.

**Approved by the Trustees on 16 April 2026**

# APPENDIX 1: DB SECTION - ASSET ALLOCATION BENCHMARK

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The Scheme's asset allocation is set out below:

<b>Asset Class</b>	<b>Strategic Allocation (%)</b>
<b>Stabilising Assets</b>	<b>100</b>
Gilts	45
Index-Linked Gilts	33
Corporate Bonds	22
Sterling Liquidity Fund*	0
<b>Total</b>	<b>100</b>

\*No strategic allocation, cash may be held in this fund from time to time, as necessary.

The Trustees will monitor this allocation and make changes if considered appropriate after receiving investment advice.

Appendix 4 provides information on the pooled funds used to implement the strategic allocation.

The policy for rebalancing and investment / disinvestment of cashflows is set out in Appendix 3.

## *Buy-In Policy*

In addition to the above, the Trustees have secured a buy-in policy with PIC to pay to the Scheme an amount equivalent to the pensions for the specified pensioners and their dependants.

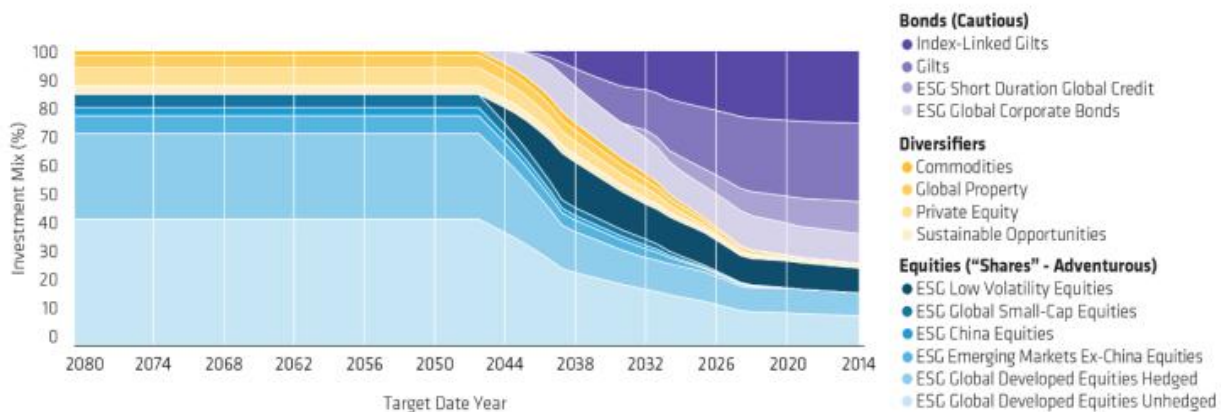
# APPENDIX 2: DC SECTION – DEFAULT STRATEGY

Members of the Scheme who do not make an explicit choice regarding the investment of their funds will be invested in the Default Arrangement chosen by the Trustees with the advice of their Investment Adviser.

The Default Arrangement utilises Target Date Funds (“TDFs”). TDFs have been designed to provide members with lower expected volatility of returns as they approach retirement, by gradually moving their savings from funds that offer long-term growth potential into funds with a lower expected volatility. Members further from retirement are provided with appropriate opportunities for asset growth, but with some volatility in asset values. As members approach retirement, the level of diversification is increased, and a greater proportion of members’ assets are switched into more defensive funds to reduce the level of expected investment volatility. Members are invested in a single TDF for the duration of their career.

For example, a member expecting to retire around 2040 would invest in the ‘2040 Fund’. This would have an internal switching mechanism and would start to switch into assets with a lower expected volatility of returns in the lead up to the ‘target date’ so that by 2040 the fund is positioned for retirement.

The Trustees have selected TDFs managed by Alliance Bernstein (“AB”) as the Scheme’s Default Arrangement. Savings will progressively move from riskier, capital growth–oriented assets into lower-risk, retirement income protection–oriented assets. The manager seeks to ensure that the mix of assets remains appropriate given the TDF’s aim, and will also employ a dynamic asset allocation strategy which seeks to mitigate the effects of large market movements without detracting from long-term returns. The manager will manage the TDFs in such a way that, for an individual investing over the whole term of each TDF, a return of CPI plus 4% per annum is targeted. This strategy can be illustrated using the following graph:



The asset allocation at retirement is considered to be suitable for a variety of member behaviours at retirement.

Taking into account the demographics of the DC Section’s membership and the Trustees’ views of how the membership will behave at retirement, the Trustees believe that the current default is appropriate. The Trustees will continue to review this over time, at least triennially, or after any significant changes to the Scheme’s demographics, if sooner.

# APPENDIX 3: CASHFLOW AND REBALANCING POLICY

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## DB Section

### Rebalancing Policy

There is no automatic rebalancing of the assets back to the Scheme's strategic asset allocation.

The Trustees will use the regular monitoring information from Mercer to monitor and take action if considered appropriate.

### Cashflows Policy

The Trustees have put in place a suitable procedure for managing the Scheme's cashflows, detailed in a separate cashflow policy.

## DC Section

The investments relate to the individual member, and therefore no cashflow or rebalancing policy is required.

# APPENDIX 4: INVESTMENT MANAGER INFORMATION

## DB Section

The DB Section of the Scheme invests via the Mobius investment platform; the table below shows the details of the pooled funds invested in via Mobius.

### Stabilising Assets

Manager / Fund	Benchmark	Objective	Dealing Frequency	Total Expense Ratio* (p.a.)
<b>Gilts Index Funds</b>				
<b>L&amp;G</b> Over 15 Year Gilts Index Fund	FTSE Actuaries UK Conventional Gilts Over 15 Year Index	To track the benchmark performance	Daily	0.084%
<b>L&amp;G</b> Over 15 Year Index-Linked Gilts Index Fund	FTSE Actuaries UK Index-Linked Gilts Over 15 Year Index	To track the benchmark performance	Daily	0.083%
<b>Money Market</b>				
<b>L&amp;G</b> Sterling Liquidity Fund	SONIA	To provide capital stability, liquidity and diversification while providing a competitive level of return	Daily	0.105%
<b>Corporate Bonds</b>				
<b>L&amp;G</b> Active Corporate Bond – All Stocks	Markit iBoxx £ Non-Gilt Index	To outperform the benchmark by 0.75% per annum (before fees) over a three-year rolling period	Daily	0.245%

\* The Total Expense Ratio includes the underlying manager and Mobius fees. Effective 30 September 2025, will vary over time.

### Buy-In Policy

In addition to the above, the Trustees have secured a buy-in policy with PIC to pay to the Scheme an amount equivalent to the pensions for the specified pensioners and their dependants.

## DC Section

The DC Section of the Scheme invests in the following:

### Default Strategy

Manager / Fund	Benchmark	Objective	Dealing Frequency	Total Expense Ratio p.a.
<b>Alliance Bernstein</b> Target Date Funds*	N/A (Asset based approach)	To outperform long term CPI inflation by between 1.5% - 4% depending on vintage	Daily	0.30%

\*Please note each member can only contribute to a single vintage from the TDF range at any one time.

The Alliance Bernstein Target Date Funds (“TDF”) are held via the investment platform provided by Mobius Life Limited. Mobius Life Limited is an authorised unit-linked UK life insurance company and provides third party investment administration platform services. It is authorised by the PRA, and regulated by the FCA and PRA.

### Self-Select Fund Range

Manager / Fund	Benchmark	Objective	Dealing Frequency	Total Expense Ratio p.a.
<b>L&amp;G</b> UK Equity Index Fund	FTSE All-Share Index	To track the benchmark performance	Daily	0.13%
<b>L&amp;G</b> Overseas Equity Consensus Index Fund	FTSE All-World (ex UK) Index	To track the benchmark performance	Daily	0.25%
<b>L&amp;G</b> Global Equity Fixed Weights (50:50) Index Fund (GBP Hedged)	50% UK and 50% Overseas GBP Hedged (17.5% North America, 17.5% Europe ex UK, 8.75% Japan, and 6.25% Asia Pacific ex Japan)	To track the benchmark performance	Daily	0.20%
<b>L&amp;G</b> World Emerging Markets Equity Fund	FTSE Emerging Markets Index	To track the benchmark performance	Daily	0.46%
<b>L&amp;G</b> Property Fund	AREF/IPD UK Quarterly All Balanced Property Fund Index	To exceed the benchmark performance over three- and five-year periods	Daily	1.04%

<b>L&amp;G</b> Over 15 Year Gilts Index Fund	FTSE Actuaries UK Conventional Gilts Over 15 Year Index	To track the benchmark performance	Daily	0.10%
<b>L&amp;G</b> Over 5 Year Index- Linked Gilts Index Fund	FTSE Actuaries UK Index-Linked Gilts Over 5 Years Index	To track the benchmark performance	Daily	0.10%
<b>L&amp;G</b> Active Corporate Bond – All Stocks Fund	Markit iBoxx £ Non- Gilts Index	To outperform the benchmark by 0.75% p.a. (before fees) over a three-year rolling period	Daily	0.25%
<b>L&amp;G</b> Sterling Liquidity Fund	SONIA	To provide a competitive return relative to benchmark, although no specific performance objective	Daily	0.12%
<b>Newton</b> Global Equity Fund	MSCI AC World Index	To achieve capital growth from a portfolio of international securities	Daily	0.80%
<b>Newton</b> Real Return Fund	SONIA (30-day compounded)	To outperform benchmark by 4% per annum over 5 years before fees	Daily	0.80%

The Total Expense Ratio includes the additional expenses and platform fee (relevant to the default strategy Alliance Bernstein TDFs only) in managing the funds. This varies over time, and the figures above are correct at the time this document is drafted.

# APPENDIX 5: RESPONSIBILITIES OF PARTIES

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## TRUSTEES

The Trustees' responsibilities include the following:

- Reviewing at least triennially, and more frequently, if necessary, the content of this Statement in consultation with the Investment Adviser and modifying it if deemed appropriate.
- Reviewing the investment strategy following the results of each actuarial review, in consultation with the Investment Adviser and Scheme Actuary.
- Appointing the Investment Manager(s), custodian (if required) and platform provider.
- Assessing the quality of the performance and processes of the Investment Manager(s) by means of regular reviews of investment returns and other relevant information, in consultation with the Investment Adviser.
- Consulting with the sponsoring employer regarding any proposed amendments to this Statement.
- Monitoring compliance of the investment arrangements with this Statement on a continuing basis.

## INVESTMENT ADVISER

The Investment Adviser's responsibilities include the following:

- Participating with the Trustees in reviews of this Statement of Investment Principles.
- Production of performance monitoring reports.
- Advising the Trustees, at their request, on the following matters:
  - Through consultation with the Scheme Actuary, how any changes within the Scheme's benefits, membership, and funding position may affect the manner in which the assets should be invested.
  - How any significant changes in the Investment Managers' organisation could affect the interests of the Scheme.
  - How any changes in the investment environment could present either opportunities or problems for the Scheme.
- Undertaking project work, as requested, including:
  - Reviews of asset allocation policy.
  - Research into and reviews of Investment Managers.
- Advising on the selection of new managers and/or custodians.
- Informing the Trustees of any significant changes or concerns in relation to the Platform provider's suitability for the Scheme.
- Advising the Trustees on an appropriate overall cashflow and rebalancing process.
- Providing advice in relation to specific cashflows and rebalancing as appropriate.

## INVESTMENT MANAGERS

For the DB Section, the responsibilities of the underlying investment managers through the Mobius TIP include:

- Informing the platform provider of any changes in the internal performance objectives and guidelines of their funds.
- Managing their funds in accordance with their stated mandates.

The underlying investment managers are not directly appointed by the Trustees and therefore do not have any direct responsibility to the Trustees.

For the DC Section the Investment managers' responsibilities include the following:

- Providing the Trustees on a quarterly basis (or as frequently as required) with a statement and valuation of the assets and a report on their actions and future intentions, and any changes to the processes applied to their portfolios.
- Informing the Trustees of any changes in the internal performance objectives and guidelines of any pooled fund used by the Scheme as and when they occur.
- Managing their funds in accordance with their stated mandates.

#### *Buy-In Policy*

The primary responsibility of PIC is to ensure that the correct amounts are paid to the Scheme on a timely basis equivalent to the pensions for the pensioners at the time of taking out the policy, and their dependants as appropriate.

## PLATFORM PROVIDER

As noted in this Statement, Mobius is the investment platform provider, and Mobius's responsibilities include the following:

- Providing the Trustees, on a quarterly basis (or as frequently as required), with a statement and valuation of the assets.
- Ensure contributions are invested/disinvested in accordance with instructions, and that switches are processed accordingly.
- Ensure instructions are in accordance with the authorised signatory lists.
- Informing the Trustees of any changes of which they are informed in the internal performance objectives and guidelines of any pooled fund used by the Scheme as and when they occur.

## SCHEME ACTUARY

The Scheme Actuary's responsibilities include the following:

- Liaising with the Investment Adviser regarding the suitability of the Scheme's investment strategy given the financial characteristics of the Scheme.
- Assessing the funding position of the Scheme and advising on the appropriate response to any shortfall.
- Performing the triennial (or more frequent, as required) valuations and advising on the appropriate contribution levels.

## ADMINISTRATOR

For the DB Section, the Administrator's responsibilities include the following:

- Ensuring there is sufficient cash available to meet benefit payments as and when they fall due.
- Paying benefits and making transfer payments.
- Investing contributions not required to meet benefit payments with Mobius according to the Trustees' instructions.

For the DC Section, the Administrator's responsibilities include the following:

- Ensure members' contributions are invested/disinvested appropriately, including ensuring the members in the default strategy are invested in the correct vintage.