

EXPRO PENSION PLAN

STATEMENT OF INVESTMENT PRINCIPLES

MARCH 2026

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1 INTRODUCTION

This Statement of Investment Principles (the “Statement”) has been prepared by the Trustees of the Expro Pension Plan (the “Plan”) 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 Plan 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 consultants, 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 Plan.

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

The Trustees' primary investment objective for the Plan is to achieve an overall rate of return that is sufficient to ensure that assets are available to meet all liabilities as and when they fall due.

In doing so, the Trustees also aim to maximise returns at an acceptable level of risk taking into consideration the circumstances of the Plan.

The Trustees received confirmation from the Scheme Actuary that their investment objectives and the resultant investment strategy are consistent with the actuarial valuation methodology and assumptions used in the Statutory Funding Objective.

3 INVESTMENT RESPONSIBILITIES

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. They have considered establishing an investment sub-committee but have decided not to do so, as each of the Trustees wishes to contribute directly to the formulation of the Plan's investment policy and to the monitoring of the Plan's investment managers. Moreover, the Trustee body is not so large as to be unwieldy in its operations. Sub-committees may be formed from time to time to examine specific issues.

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 this Statement
- The appointment and review of the investment adviser
- The assessment and review of the performance of each investment manager
- The appointment and review of the investment platform provider
- The choice of appropriate managers/funds to implement the agreed investment strategy
- The assessment of the risks assumed by the Plan at a total Plan level as well as on a manager by manager basis
- The approval and review of the asset allocation benchmark for the Plan
- 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 Plan. 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 or assistance 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 underlying investment managers and investment platform provider to ensure their continuing appropriateness to the mandates given
- Advising on appropriate cashflow management (investment and withdrawal) policies (see Appendix 2)

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 2). Whilst Mercer may be proactive in advising the Trustees regarding tactical investment decisions, the Trustees do not expect Mercer to be proactive in all circumstances.

Mercer provides regular quarterly reporting to monitor the performance of the Plan'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 Plan 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 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 Plan that might affect the impartiality of their advice, and as noted below, any discounts negotiated by Mercer with the underlying managers and these discounts are passed on in full to the Plan.

The Trustees are satisfied that this is the most appropriate adviser remuneration structure for the Plan.

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

3.3 ARRANGEMENT WITH INVESTMENT MANAGERS

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

The Plan's assets are invested via a Trustee Investment Policy ("TIP") issued by Mobius Life Limited ("Mobius"), whose appointment foregoes the need for a Custodian. The Plan first invested through the Mobius TIP in September 2013.

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 managed by the third party investment managers and the value of the Mobius TIP is directly linked to the change in the value of the funds. All of the underlying investment managers used by the Trustees are authorised and regulated by the FCA.

All the underlying investment managers used by the Trustees through the Mobius TIP are selected based on advice from the investment adviser. This is based on Mercer's view of their capabilities and, therefore, their perceived likelihood of achieving the expected return and risk characteristics required for the asset class being selected.

Mercer monitors the underlying investment managers to ensure their continuing appropriateness to the mandates given. If a manager is significantly downgraded by Mercer, Mercer will notify the Trustees and the Trustees may, after appropriate consideration, replace that manager with a suitable alternative.

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

The underlying investment managers are responsible for all decisions concerning the selection and de-selection of the individual securities within the pooled funds they manage.

In the case of multi-asset mandates, the underlying investment managers are responsible for all decisions concerning the allocation to individual asset classes and changes in the allocations to individual asset classes.

Both Mobius and the underlying investment managers are remunerated by ad valorem charges based on the value of the assets that they manage on behalf of the Plan. Discounts have, where possible, been negotiated by Mercer and Mobius with the managers on their standard charges and these discounts are passed on in full for the benefit of the Plan. Mobius also levy a modest, fixed policy fee.

None of the funds in which the Plan'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, they 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.

The Trustees accept that they cannot influence the charging structure of the pooled funds in which the Plan 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 Trustees' policies as set out in this SIP.

The Plan also has an insurance policy with Standard Life Assurance ("Standard Life", part of the Phoenix Group), in respect of certain benefits of the former Unapproved Section.

Standard Life 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 Plan administrators, so far as they relate to the Plan's investments, is set out in Appendix 4.

4 INVESTMENT STRATEGY

4.1 SETTING INVESTMENT STRATEGY

The Trustees have determined their investment strategy after considering a number of factors including the Plan's liability profile and requirements of the Statutory Funding Objective, their own appetite for risk, the views of the Sponsoring Employer on investment strategy, the Sponsoring Employer's appetite for risk, the strength of the Sponsoring Employer's covenant, and the Plan's liquidity requirements. The Trustees have also received written advice from their investment adviser.

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

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.

The Trustees have also consulted with the Sponsoring Employer, and provided to the Sponsoring Employer the advice they have received to support their decision.

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 2, as well as the policy on re-balancing the assets.

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 Plan.

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 Plan 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 Plan is invested.

4.3 TYPES OF INVESTMENTS TO BE HELD

The Trustees are permitted to invest across a wide range of asset classes. All the funds in which the Plan invests are pooled and unitised. The use of derivatives is as permitted by the guidelines that apply to the pooled funds.

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.

The Trustees 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 Diversified Growth / Absolute Return Funds (“DGFs”), which invest across a diversified range of assets. The Trustees also hold Multi Asset Credit (“MAC”) funds within their portfolio which provide exposure to a diversified range of bond assets.

The Trustees note that the actuarial value of the Plan’s future benefits payments to members is sensitive to changes in interest rates and inflation expectations. The Trustees have therefore invested in Liability Driven Investment (“LDI”) funds, which include a Nominal LDI fund, and also Credit linked and Equity linked LDI funds. All these funds aim to respond in a similar way to changes in these factors and reduce the volatility of the Plan’s funding position (referred to as liability hedging), whilst the latter two provide exposure to credit and equity markets respectively.

4.4 FINANCIALLY MATERIAL CONSIDERATIONS

The Trustees consider many risks which they anticipate could impact the financial performance of the Plan’s investments over its expected lifetime. Such risks are set out in the next section of this statement.

The Trustees recognise that environmental, social and corporate governance (“ESG”) factors, such as climate change, can influence the investment risk and return outcomes of the Plan’s portfolio and it is therefore in members’ and the Plan’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 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.

In setting their investment strategy for the Plan, the Trustees have prioritised funds which provide leveraged protection against movements in the Plan’s liability value and also funds which provide actively managed diversification across a wide range of investment markets and consider the financially significant benefits of these factors to be paramount.

The Trustees note that ESG considerations are not central to the first level decision making process within the funds which provide either actively managed diversification or leveraged liability protection. However, in the actively managed Diversified Growth Funds in which the Plan invests, whilst managers typically do not put ESG considerations at the heart of the asset allocation decision, they will embed ESG considerations into the management of the underlying asset classes where it is appropriate to do so.

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. This information is included in Mercer's quarterly monitoring reports in respect of the funds in which the Plan is invested, so that the Trustees can monitor how these assessments 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.

The Trustees review ESG considerations to make sure that their policy evolves in line with emerging trends and developments.

As part of the actuarial valuation process, the Trustees consider the potential impact of different climate change scenarios on the Plan's funding position.

The Plan's investment strategy has high levels of liability hedging, to provide protection against movements in liability values that could be caused by changes to interest rates and inflation expectations, for which climate change could be a contributing factor.

The Plan's growth assets are largely invested in funds where the manager has full discretion of where to invest (within the constraints of their fund's mandate), and can evolve their fund's asset allocation over time to respond to, and adapt to, emerging developments, including those in relation to climate change.

The Trustees are therefore satisfied that ESG factors, including risks relating to climate change, are appropriately considered and reflected in the overall investment approach.

4.5 NON - FINANCIAL CONSIDERATIONS

The Trustees have determined that the financial interests of the Plan members are their first priority when choosing investments.

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

4.6 STEWARDSHIP

The Plan is invested solely in pooled investment funds through the Mobius TIP and the Trustees therefore have no direct voting rights.

The Trustees' policy is therefore to invest with investment managers where responsible investment is embedded appropriately in their approach to investment; including monitoring and engaging with investee companies and exercising voting rights appropriately.

Information on the investment managers' approaches to responsible investment, voting and engagement with the investee companies is available at the following websites:

Nordea:

<https://www.nordeaassetmanagement.com/responsible-investment>

Columbia Threadneedle:

<https://www.columbiathreadneedle.co.uk/en/inst/about-us/responsible-investment/>

Pictet:

<https://am.pictet/en/uk/global-articles/company/responsible-investment/tab/OurActionPlan/LeversOfAction>

Ninety-One:

<https://ninetyone.com/en/international/sustainability>

M&G:

<https://www.mandg.com/who-we-are/mandg-investments/responsible-investing-at-mandg-investments>

All the Plan's investment managers are signatories of the UK Stewardship Code as follows:

Manager	Signatory since
Pictet	2022
Columbia Threadneedle	2022
M&G	2021
Nordea	2022
Ninety One	2021

Source: FRC website.

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

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

The Trustees have identified that climate change and carbon neutrality is their most important stewardship priority. The Trustees monitor the key voting activity of their investment managers on climate change and carbon neutrality as part of the annual Engagement Policy Implementation Statement (EPIS).

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.

The Trustees also note that, in respect of the insurance policy with Standard Life, the Phoenix Group has been a signatory of the UK Stewardship Code since 2023.

5 RISK

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.

Solvency Risk and Mismatching Risk

- These are measured through a qualitative and quantitative assessment of the expected development of the assets relative to the liabilities.
- They are managed by setting a Plan-specific strategic asset allocation with an appropriate level of risk, and by monitoring the development of the funding position on a monthly basis.

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 managed by monitoring the actual deviation of returns relative to the objective and factors supporting the underlying managers' investment processes, and by appointing Mercer to monitor and if requested, advise on the replacement of the manager where concerns exist over its continued ability to deliver the investment mandate.
- It is also managed through the diversification of the Plan's assets across a range of funds with different investment styles and by using the Mobius Platform, which enables quick and efficient replacement of managers if appropriate.

Liquidity Risk

- This is monitored according to the level of cashflows required by the Plan over a specified period.
- It is managed by holding an appropriate amount of readily realisable investments. The Plan's assets are invested in pooled funds which are readily realisable.

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.

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.

Sponsor Risk

- This is assessed as the level of ability and degree of willingness of the sponsor to support the continuation of the Plan and to make good any current or future deficit.
- It is managed by assessing the interaction between the Plan 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 from senior staff of the sponsor.

- It is also managed by seeking to reduce the level of risk within the Plan over time, to reduce the reliance on the covenant of the employer.

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 Plan'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 consultant's ESG assessment of the Plan's managers, and by reviewing ESG considerations on an ongoing basis to make sure that their approach evolves in line with changing circumstances.
- It is also managed by investing in funds with a wide degree of diversification where the investment manager has full discretion of where to invest (within the constraints of their fund's mandate), and can evolve their fund's asset allocation over time to respond to, and adapt to, emerging ESG developments.

Credit Risk

- This is the risk that is associated with the inability of a borrower to repay, in full or part the monies which it owes to a creditor.
- The Plan 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.
- The Plan's holdings in pooled investment vehicles are unrated. 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 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 fund managers.
- Indirect credit risk arises in relation to underlying bond investments held in the pooled funds. This risk is mitigated by investing in funds with diversified portfolios and by investing in LDI funds with sound collateralisation and risk management procedures.

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 Plan 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 Trustees acknowledge that currency risk related to overseas investments is delegated to the underlying investment managers, but by investing in a diversified investment portfolio, and in funds which all have a Sterling benchmark, the impact of currency risk is mitigated.
- The Trustees note that the market exposures within the Credit and Equity Linked LDI funds include allocation to overseas markets, but that this is on a currency hedged basis.

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 or expected inflation. This affects debt instruments more directly than growth instruments.
- The Trustees recognise that the Plan's liabilities are exposed to a significant level of interest rate and inflation risk movement and for this reason it is desirable for the Plan's assets to be exposed to a similar level of

interest rate and inflation risk. The Trustees have therefore invested in LDI funds to manage this risk, with the LDI strategy set so as to provide an acceptable level of hedging against the interest rate and inflation risk inherent within the Plan's liabilities.

Other Price Risk

- This is the risk of volatility in fund values and principally arises in relation to the growth assets, for which the Plan invests in equities and DGFs. By investing in DGFs the Plan benefits from access to a diverse range of investments across a range of investment markets.

6 MONITORING OF INVESTMENT ADVISER AND MANAGERS

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 quarterly monitoring reports on the performance of the underlying investment managers from Mercer, which present performance information over 3 months, 1 year and 3 years. The reports show the absolute performance and performance of 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 be used to help inform the assessment of the underlying managers' performance.

The reporting also reviews the performance of the Plan's assets in aggregate against the Plan's strategic benchmark and also of the development of the Plan's assets relative to its liabilities.

In conjunction with advice and information from the investment adviser, the Trustees have the role of replacing the underlying investment managers where appropriate. The Trustees take a long-term view when assessing whether to replace the underlying investment managers and such decisions would not be made based solely on short-term performance concerns. Instead, changes would be driven by a significant downgrade of the investment manager by Mercer. This in turn would be due to a significant reduction in Mercer's confidence that the investment manager will be able to perform in line with its fund's mandate over the long term.

Changes will also be made to the underlying investment managers if there is a strategic change to the overall strategy that no longer requires exposure to that asset class or manager.

6.3 PORTFOLIO TURNOVER COSTS

The Trustees do not currently monitor portfolio turnover costs for the funds in which the Plan is invested, although note that the performance monitoring reports which they receive are net of all charges, including such costs. Portfolio turnover costs mean 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 Plan 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 Plan and are satisfied that this is appropriate.

7 ADDITIONAL VOLUNTARY CONTRIBUTIONS

The Plan provides a facility for members to pay for Additional Voluntary Contributions (“AVCs”) to enhance their benefits at retirement. Members are offered a range of funds in which to invest their AVCs with Standard Life and Legal & General.

8 BEST PRACTICE

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>.

The Trustees receive investment advice which ensures that the principles contained within this guidance are applied to the Plan as far as relevant to the Plan's circumstances.

The investment adviser attends each Trustee meeting. This enables developments to be monitored, both in relation to the Plan's circumstances and in relation to evolving guidance, so that the Plan's investment approach can be revised if considered appropriate.

9 COMPLIANCE

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

A copy of the Plan's current Statement plus Appendices is also supplied to the Sponsoring Employer, the Plan's auditor and the Scheme Actuary.

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

Approved by the Trustees on 23 March 2026

APPENDIX 1: ASSET ALLOCATION BENCHMARK

The Plan's strategic asset allocation benchmark is set out below.

Asset Class	Allocation (%)	Guideline Range (%)
Growth Assets	42.0	+/-12.0
Diversified Growth	42.0	+/-12.0
Stabilising Assets	58.0	+/-12.0
Multi Asset Credit	20.0	+/-8.0
LDI (Nominal)	4.0	+/-2.0
Equity Linked LDI (Nominal)	15.0	+/-8.0
Credit Linked LDI (Real)	19.0	+/-10.0

The policy for rebalancing and investment / disinvestment of cashflows is set out in Appendix 2.

Information on the investment funds held is set out in Appendix 3.

In addition to the above, the Plan also has an insurance policy with Standard Life in respect of certain benefits of the former Unapproved Section.

APPENDIX 2: CASHFLOW AND REBALANCING POLICY

Rebalancing Policy

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

The Trustees will use the regular monitoring information from Mercer to monitor against the guideline ranges.

If the assets move outside the guideline range, the Trustees will liaise with Mercer to consider whether action is required. Importantly, there will be circumstances where it is appropriate not to undertake any rebalancing.

Cashflows Policy

The Trustees have put in place a suitable procedure for managing the Plan's cashflows.

The Trustees note that the Plan's LDI assets provide protection against changes in yields and inflation expectations and have therefore agreed that no cashflows should be made to or from the LDI funds.

Therefore, regular cashflows are to be dis/invested from/to the non-LDI assets on a pro-rata basis. This approach will maintain the overall weighting of the non-LDI assets.

LDI Recapitalisation

The Trustees note that the LDI manager may require additional assets from time to time in order to support the operation of the LDI funds or may release assets from time to time. The Trustees have put in place a policy with Mobius regarding this recapitalisation/release procedure.

APPENDIX 3: INVESTMENT MANAGER INFORMATION

The table below show details of the underlying funds invested in.

Investment Funds	Benchmark	Total Expense Ratio* (% pa)
Columbia Threadneedle Multi-Asset	To outperform the UK Bank of England Base Rate by at least 4.0% p.a. before of fees over a 5 to 7 year cycle.	0.395
Nordea Diversified Return Fund	To outperform the 3 month SONIA by at least 4.0% p.a. before fees over rolling 3 year periods	0.695
Pictet Dynamic Asset Allocation Fund	To outperform the 3 month SONIA by at least 4.0% p.a. (net of fees) over rolling 3 year periods	0.590
Ninety One Global Total Return Credit Fund	To outperform the 3 month SONIA by 4% to 6% p.a. before fees over rolling 3 year periods	0.575
M&G Total Return Credit Investment Fund	To outperform the 3 month SONIA by 3% to 5% p.a. before fees over rolling 3 year periods	0.455
CT Nominal Dynamic LDI	To provide liability hedging by offering interest rate protection which replicates the liability profile of a typical UK defined benefit pension plan.	0.288
CT Equity Linked Nominal Dynamic LDI	To provide liability hedging by offering interest rate protection which replicates the liability profile of a typical UK defined benefit pension plan, and exposure to global equity market returns on a currency hedged basis.	0.324
CT Credit Linked Real Dynamic LDI	To provide liability hedging by offering interest rate and inflation protection which replicates the liability profile of a typical UK defined benefit pension plan, and exposure to credit returns.	0.324

* The TER includes the underlying manager and Mobius fees. Effective 30 June 2025, will vary over time.

APPENDIX 4: RESPONSIBILITIES OF PARTIES

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
- Selecting appropriate investment managers, and appointing an appropriate investment platform provider
- Assessing the quality of the performance and processes of the underlying investment managers, 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 the review of this Statement
- Production of performance monitoring reports
- Informing the Trustees of any significant changes in the internal performance objectives and guidelines of any pooled fund used by the Plan as and when the investment adviser is made aware of them
- Advising the Trustees, at their request, on the following matters:
 - Through consultation with the Scheme Actuary, how any changes within the Plan's benefits, membership, and funding position may affect the manner in which the assets should be invested
 - How any significant changes in the underlying investment managers, could affect the interests of the Plan
 - How any changes in the investment environment could present either opportunities or problems for the Plan
- Monitoring the underlying investment managers to ensure their continuing appropriateness to the mandates given
- Informing the Trustees of any significant changes or concerns in relation to the platform provider's suitability for the Plan
- Advising the Trustees on an appropriate overall cashflow and rebalancing process
- Providing advice in relation to specific cashflows and rebalancing as appropriate
- 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

INVESTMENT MANAGERS

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.

PLATFORM PROVIDER

As noted in this SIP, 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 Plan 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 Plan's investment strategy given the financial characteristics of the Plan
- Assessing the funding position of the Plan 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

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 the investment managers according to the Trustees' instructions.