

STATEMENT OF INVESTMENT PRINCIPLES (SIP) – SEETRU LIMITED PENSION AND ASSURANCE SCHEME – DB SECTION

July 2023

1. Introduction

This statement sets out the principles governing decisions about the investment of the assets of the DB Section of the Seetru Limited Pension and Assurance Scheme ('the Scheme'). The Trustee of the Scheme ('the Trustee') issues this statement to comply with the Pensions Act 1995 and the Occupational Pension Schemes (Investment) Regulations 2005.

This statement will be reviewed at least once every three years or after any significant change in investment policy.

Before preparing this statement, the Trustee has:

- obtained and considered the written advice of a person who is reasonably believed by the Trustee to have the appropriate knowledge and experience of financial matters and investment management; and
- consulted the employer in relation to the Scheme.

The Statement of Investment Principles for the Defined Contribution Section of the Scheme is provided separately.

2. Investment objectives

The Trustee's main objectives with regard to investment policy are as follows:

- to hold sufficient assets to meet the liabilities of the Scheme; and
- to ensure that sufficient liquid assets are available to meet benefit payments as they fall due.

3. Policy on choosing investments

The policy on choosing investments is as follows:

- the nature of the liabilities of the Scheme are considered in setting the Scheme's strategic asset allocation. This includes consideration of interest rates, inflation, mortality and other financial and demographic factors.
- the Trustee's funding objectives are considered. To meet these objectives the Trustee has set a performance objective for the assets and a target liability coverage, which in its opinion is consistent with its funding objectives and risk appetite.
- the Scheme's funding objective, investment return target, and target liability coverage form part of the Trustee's investment policy. The implementation of the investment policy is delegated to a fiduciary manager.
- the Scheme's strategic asset allocation is split into Matching Assets and Growth Assets.
 - **Matching Assets:** Comprise assets (including, but not limited to, UK government bond and derivative exposures) which are held with the aim of matching the interest rate and inflation exposures of the Scheme's expected liabilities.
 - **Growth Assets:** The Trustee recognises the benefits of diversification across the Scheme's Growth Assets. Growth Assets comprise assets (including but not limited to,

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- developed and emerging market equities, corporate bonds and alternative assets) that are held with the aim of outperforming the Scheme's liabilities over the medium term.
- in advising the Trustee on the Scheme's strategic asset allocation, the fiduciary manager makes use of a set of assumptions about the long-term expected return from the main permitted asset classes. These assumptions are developed by the fiduciary manager based on input from a range of experts including the fiduciary manager's in-house economics specialists. The assumptions are updated by the fiduciary manager periodically. These can be provided upon request.

4. Risk

The Trustee measures and monitors the ongoing appropriateness of the investment objectives and risks through a combination of:

- Quarterly investment monitoring reports
- Annual reporting on turnover and transaction costs
- Estimates of the progression of the funding level and the impact of market moves on the funding level of the Scheme
- Triennial actuarial valuations
- Strategy reviews undertaken following completion of the actuarial valuation
- Ad-hoc investigations in the event of significant market events or changes to the expected liabilities.

The Trustee recognises a number of risks involved in the investment of the assets including:

- **Interest rate and inflation risk:** the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in market interest rates and expected future inflation rates. The Trustee receives information about the estimated level of interest rate and inflation risk in the strategy on a regular basis. Interest rate and inflation risks are managed using Liability Driven Investment techniques within the Matching Assets.
- **Currency risk:** the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in foreign exchange rates. This risk is measured and actively managed on an ongoing basis by the Scheme's investment managers. The majority of the overseas currency exposure in the portfolio is hedged back to Sterling, unless there is expected to be a risk or return benefit to the Scheme from leaving exposures to one or more overseas currencies unhedged.
- **Credit risk:** the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation. This risk is measured and actively managed on an ongoing basis by the Scheme's fiduciary manager. The fiduciary manager seeks to achieve a diversified exposure to a range of growth asset risks including credit risk so that no single risk in the portfolio dominates.
- **Other price risk:** the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in market prices (other than those arising from interest rate risk or currency risk). These are measured and managed on an ongoing basis by the Scheme's fiduciary manager. The Scheme's fiduciary manager seeks to achieve a diversified exposure to a range of growth asset risks so that no single risk in the portfolio dominates.

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- **Liquidity risk:** the risk that the Scheme is unable to meet benefit payments as they fall due. This is managed by the fiduciary manager by holding an appropriate level of readily realisable investments.
- **Concentration risk:** The failure to spread investment risk, which may be caused by investing in too narrow a range of investments, or investments that are affected by markets in a similar way. The fiduciary manager ensures assets are spread across a range of investments
- **Fiduciary manager risk:** The fiduciary manager fails to meet its objectives. The Trustees monitor the performance of the portfolio against the investment objective of the Trustees and ensures that the fiduciary manager is suitably qualified and experienced to perform their role.
- **ESG risk:** the risk of adverse performance due to ESG related factors including climate change. This is addressed by the fiduciary manager's ESG assessment at the point of investment with underlying managers.

5. Realisation of investments

The majority of the Scheme's assets are realisable at short notice. Therefore, the Trustees are satisfied that sufficient assets held will be readily realisable to provide cash to meet payments by the Scheme.

In addition, the Trustee is also satisfied that the spread of assets and the fiduciary manager's policies provide adequate diversification of investments.

6. Social, environmental, governance considerations and climate change

Financially material considerations

The Trustee believes that Environmental, Social and Governance (ESG) related risks, including climate change risks, are financially material and an important component of investment risk. The Trustee believes that organisations that soundly manage ESG related risks are more likely to be financially sustainable over time, and therefore deliver better long-term risk-adjusted returns.

Environmental factors include climate change, resource, especially water, scarcity, and waste treatment practices. The Trustee recognises that climate change is a key environmental challenge that poses both risks and opportunities. These may take the form of rising physical losses from extreme weather in the short term, the medium-term impacts from the implementation of climate change policy, and the longer-term impacts if global temperature rises are not limited.

Social factors include diversity, human capital management, health and safety, customer and supplier relationships, and interactions with local communities, regulators and governments. Organisations today must recognise that they operate under a social licence, and that relationships with stakeholders should reflect these obligations.

Governance factors include business ethics, transparency of company management and reporting, executive remuneration and board structure. Well-governed organisations typically face lower levels of ESG risk as a result of a strong governance culture and appropriate policies and procedures, enabling them to deliver sustainable long-term returns.

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The Trustee requires the fiduciary manager to integrate analysis of relevant ESG issues into their investment decision making processes. The Trustee monitors how the fiduciary manager takes ESG issues into account in practice on a regular basis, through the quarterly investment monitoring reports..

Non-financial matters

The Trustee does not take into account non-financially material ESG considerations in the management of their investments.

7. Stewardship, voting and engagement activities

The Trustee have instructed the fiduciary manager to exercise their voting and other rights as shareholders in a manner the fiduciary manager believes to be consistent with best practice in relation to Corporate Governance and in accordance with the Institutional Shareholders' Committee's ("ISC") Statement of Principles on the Responsibilities of Institutional Shareholders and Agents.

The Trustee recognises the Scheme's responsibility as a long term institutional investor to support and encourages good corporate governance practices in the companies in which it invests, because this also protects the value of the Scheme's investments while they are held.

The Trustee therefore requires their fiduciary manager in their stewardship of the Scheme's assets to pay appropriate regard to the investee companies' performance, strategy, capital structure, management of actual or potential conflicts of interest, risks, social and environmental impact and corporate governance when considering the purchase, retention or sale of investments. The Trustee has set six stewardship priorities (or engagement themes) and encourage their fiduciary manager to vote and engage on all of them:

Engagement theme	Engagement rationale / objective
Climate	Companies urgently need to transform the economy to avoid the most catastrophic effects of climate change on people and the planet, and adapt to future temperature rises.
Corporate Governance	Strong governance policies and practices ensure that businesses act in the best interest of shareholders and other key stakeholders in order to drive long term sustainable value creation.
Human Capital Management	People in an organisation are a significant source of competitive advantage. Effective human capital management is essential to drive innovation and long term value creation.
Human Rights	Businesses involved in human rights controversies could face higher operational and financial risks, and could suffer damages to their reputation. Respect for human rights is also an important foundation in building resilient supply chains and forging business stability.
Inclusion and Diversity	Diversity across multiple dimensions brings a valuable range of outlooks and opinions, and when paired with an inclusive culture, can lead to higher quality work, better decision making and problem solving, and greater team satisfaction.

Natural Capital and Biodiversity	Natural capital and biodiversity loss could mean businesses, banks and investors face increased insurance risks, higher costs of capital and a loss of investment opportunities. Furthermore, regulatory and policy pressures could have direct revenue impacts.
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The Trustee oversees their fiduciary manager’s voting and engagement activities to ensure compliance with this requirement. The Trustee prepares an Implementation Statement along with their Report and Accounts which describes their voting and engagement policies and their voting behaviour.

8. Arrangements with asset managers

The Trustee incentivises the fiduciary manager’s alignment with their policies relating to sections 3, 4, 5 and 6 using the reporting and activities listed under section 4 to oversee the fiduciary manager’s execution of its mandate; should the Trustee believe that the fiduciary manager is not aligned with their policies they will consider making changes to the fiduciary manager’s mandate as necessary.

The Trustee remunerates the fiduciary manager on a percentage of the assets under management, and will keep the rates under review. The Trustee does not have any fee arrangements in place with the fiduciary manager that incentivise it to deviate from the Trustee’s policies (such as performance fees that reward positions taken in the market without regard to the environmental, social and governance considerations referred to in section 6). Rather, the fee arrangements are consistent with, and therefore incentivise alignment with, those policies by encouraging the preservation of capital and risk-managed returns over an extended time horizon.

The Trustee reviews the annual portfolio turnover and the associated costs incurred by its fiduciary manager against its targeted portfolio turnover or expected turnover range. Targeted portfolio turnover is defined as the expected level of asset sales and purchases in the portfolio based on recent historical experience and expected turnover range is similarly defined as the minimum and maximum frequency of such transactions based on recent historical experience.

The fiduciary manager was appointed by the Trustee in July 2023.

Dated July 2023

Signed for and on behalf of the Trustee of the Scheme:

..... Name (Print)

..... Signature

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..... Date