



# Statement of Investment Principles

The Lafarge UK Pension Plan – Non-LRPS Section (Blue Circle)

February 2026

## Introduction

This Statement of Investment Principles (the “SIP”) sets out the policy of Lafarge UK Pension Trustees Limited acting as Trustee of the Non-LRPS Section of the Lafarge UK Pension Plan (the “Plan”), a Defined Benefit (“DB”) scheme. on various matters governing decisions about the investments of the Plan. This SIP replaces the previous SIP dated September 2024.

This SIP is designed to meet the requirements of Section 35 of the Pensions Act 1995, (as amended by the Pensions Act 2004) (the “Act”) and the Occupational Pension Schemes (Investment) Regulations 2005 and the Occupational Pension Schemes (Investment and Disclosure)(Amendment) Regulations 2019 (“the Regulations”) and subsequent legislation. This SIP is also in compliance with the Government's voluntary code of conduct for Institutional Investment in the UK (‘the Myners Principles’) and TPR’s Investment Guidance for defined benefit pension schemes.

This SIP has been prepared after obtaining and considering written professional advice from the Trustee's Investment Adviser and Fiduciary Manager, Van Lanschot Kempen Investment Management(“VLK”), and the Scheme Actuary, Aaron Punwani FIA (collectively termed ‘Professional Advisors’).

The Trustee is responsible for setting the general investment policy and the strategic asset allocation, on the advice of VLK, but delegate the responsibility for the selection of specific investments to VLK, who in turn delegate the day-to-day management of the assets to underlying investment managers. The Professional Advisors and investment managers provide the skill and expertise necessary to advise on and manage the investments of the Plan. The Trustee believes them to be suitably qualified and experienced to provide such advice.

In preparing this SIP the Trustee has consulted with Lafarge S.A. (‘the Employer’) which has been nominated by all participating employers under the Plan for this purpose, to ascertain whether there are any material issues which the Trustee should consider in determining the Plan’s investment arrangements. The Trustee seeks to maintain a good working relationship with the Employer and will discuss any proposed changes to the SIP with the Employer.

## Plan Details

The Plan is a Registered Pension Scheme for the purposes of the Finance Act 2004. Its purpose is to provide retirement and death benefits on a defined benefit basis to eligible participants and beneficiaries.

Within the Defined Benefit section, the Plan previously provided a facility for members to pay Additional Voluntary Contributions (“AVCs”) into the Plan to enhance their benefits at retirement. Certain members of the Defined Benefit section have invested in the assets of the defined benefit sections (‘internally invested AVCs’ to which interest is added six monthly). From 1 November 2011, no further contributions may be made under this AVC option.

## Investment Governance

The Trustee is responsible for the governance and investment of the Plan’s assets. The Trustee considers the governance structure set out in this SIP to be appropriate for the Plan, as it allows the Trustee to make the important decisions on investment policy including the strategic asset allocation, whilst delegating the day-to-day aspects of investment management to its Professional Advisors and investment managers. The Trustee has concluded a fiduciary management approach would be most appropriate for the Plan, and consequently appointed VLK as the Plan’s Investment Advisor and Fiduciary Manager.

The Trustee has appointed an Investment Sub-Committee (the ‘ISC’) to deal with investment matters on their behalf. The ISC acts as a coordinator between the Professional Advisors and the Trustee. The Trustee will review this SIP at least every three years, or following any significant changes to the investment strategy, and modify it with consultation from the Professional Advisers and the Employer if deemed appropriate.

The funding position is reviewed periodically by the Scheme Actuary, with a full actuarial valuation at least every three years. The Trustee considers with the Professional Advisors whether the results of these actuarial valuations suggest that any change to investment strategy is necessary to ensure continued compliance with the statutory funding requirement.

The responsibilities of each of the parties involved in the governance of the Plan are detailed in Appendix A.

## Suitability

It is the responsibility of the Trustee to maintain investments that are consistent with the investment objectives (and consistent with the SIP more generally) and with due regard to the Plan's liabilities.

The Trustee's policy on the kinds of assets held is that they must be suitable given the investment objectives, legislative requirements, regulatory guidance, statutory funding requirements and any specifications in the trust deed and rules governing the Plan (the Trust Deed).

The Trustee has taken advice from the Professional Advisers to ensure that the proposed investment strategy, and the assets held by the Plan are in line with its policy.

## Investment Objectives

The overall objective of the Trustee is to ensure the Plan should be able to meet benefit payments as they fall due. To do this, the Trustee, in consultation with their Professional Advisers, has agreed a number of additional objectives to help guide them in their management of the assets and control the various risks to which the Plan is exposed. These are as follows:

- The acquisition of suitable assets, having due regard to the risks as described in Appendix B, which will generate income and capital growth to pay, together with contributions from the Employer, the benefits which the Plan provides as they fall due.
- To limit the risk of the assets being assessed as failing to meet the liabilities over the long term having regard to any statutory funding requirement.
- Achieve an investment return on the Plan's assets which is compatible with the Trustee's risk tolerance and expected to at least meet the Scheme Actuary's assumptions over the long term.
- To minimise the long-term cost of the Plan to the Employer whilst having due regard to the above.
- The Trustee has given the Fiduciary Manager the following objective: To take appropriate investment risks with the aim of achieving a target return of gilts + 1.5% per year compound net of all fees over the long term
- The Trustee considers that one way of achieving its investment objectives is to enter into a bulk annuity contract with an insurance provider, when there are sufficient funds to meet the cost of the premium charged by the insurer.

The Trustee's policy on the balance between different kinds of investments is to delegate this decision to VLK. VLK's approach is to assess the appropriate balance based on the Trustee's investment strategy.

## Strategy Implementation

The Trustee recognises the importance of asset allocation to the overall investment strategy, and has therefore delegated the implementation of the strategy (including the appointment, termination and ongoing monitoring of the underlying investment managers who manage the assets of the Plan) to its Fiduciary Manager, VLK.

Before investing in any manner, the Trustee obtains and considers proper written advice from VLK on whether the investment is satisfactory, having regard to the need for suitable and appropriately diversified investments that meet the Plan's investment objectives. The Trustee also receives advice from VLK on the appropriateness of the investment managers that are selected to manage the investments.

The Trustee, VLK and the underlying investment managers to whom discretion has been delegated exercise their powers giving effect to the principles in this Statement of Investment Principles, so far as is reasonably practicable.

## Selection and Monitoring of Investment Managers

VLK will monitor the performance of the investment strategy to ensure it continues to perform in a manner which is consistent with the agreed objectives and risk tolerances in alignment with the Trustee's investment policy.

The Trustee's policy is to delegate to VLK the responsibility for the selection, appointment, monitoring and removal of the underlying investment managers.

VLK's role includes:

- Agreeing the terms of appointment for underlying managers;
- Putting in place fee arrangements which incentivise the manager to align its strategy to the Trustee's policies generally (to the extent possible);
- monitoring the underlying investment managers, to ensure they continue to perform in a competent manner and have the appropriate knowledge, skills and experience to manage the assets of the Plan;
- monitoring the extent to which the underlying investment managers (i) make decisions based on assessments about medium to long-term financial performance of an issuer of debt or equity; and (ii) engage with issuers of debt or equity in order to improve their performance in the medium to long-term; and
- assessing the duration of any appointments of asset managers and, where appropriate terminating managers that are no longer aligned with the Trustee's investment strategy.

This will involve quarterly assessments against criteria such as strength of organisation and their operating capabilities, adherence to and the success of their designated strategies, and reviews of portfolio characteristics including responsible investment factors. VLK evaluates the performance of the underlying investment managers stated in the investment managers' performance objective against the Trustee's investment strategy and policies generally over an appropriate time horizon.

The Trustee, or any other suitably qualified adviser on behalf of the Trustee, will regularly review the activities of VLK to satisfy themselves that they continue to carry out their work competently and have the appropriate knowledge and experience to advise on and implement the agreed strategy. Typically, this is reviewed on an annual basis.

## Portfolio Turnover Costs

These are the costs incurred as a result of the buying, selling, lending or borrowing of investments and the Trustee monitors these costs (as well as other investment management fees and costs) through annual cost reports provided by VLK.

The Plan's investment portfolios are re-balanced quarterly, to ensure the assets continue to be aligned with the agreed investment strategy. The turnover and transaction costs associated with this rebalancing activity is expected to be small. A greater degree of portfolio turnover (and therefore cost) is only expected as a result of larger changes to the strategic asset allocation, for example as the investment strategy is de-risked as the funding level improves.

## Custody Arrangements

The Plan's assets, other than the pooled investment arrangements and insurance contracts, are held by Northern Trust, a Custodian appointed under an agreement with the Trustee. The Plan's assets are held in the name of the Trustee except where it has been agreed by the Trustee that they may be held by the Custodian in the name of a nominee company as nominee for the Trustee. The Trustee believes that the custodial arrangements are a vital part of the management of the Plan's assets and recognises the importance of monitoring the custodial arrangements, including the annual verification of the Plan's assets by the Plan's Auditor.

## The Trustees' Policy on Financially Material Considerations and Non-Financial Matters

In setting and implementing the Plan's investment strategy, the Trustee does not explicitly take into account the views of Plan members and beneficiaries in relation to ethical considerations, social and environmental impact, or present and future quality of life matters (defined as non-financial factors).

The Trustee has considered how responsible investment, climate change and other ethical factors (collectively known as 'ESG'), should be taken into account in the selection, retention and realisation of investments, given the time horizon of the

Plan. The Trustee believes that if these factors are considered and managed within the investments the Plan holds, it is expected to produce better financial (and therefore member) outcomes over the long term.

Without prejudice to the Trustee's legal obligations, the Trustee delegates full discretion to their Investment Advisor and Fiduciary Manager, VLK, around the evaluation of ESG and climate change within the investment process and the assets. VLK, who is responsible for the appointment and removal of the underlying investment managers, exercise discretion when evaluating ESG issues giving consideration to ESG related risks and making sure the investment strategy is aligned with the ESG beliefs of the Trustee.

The Trustee recognises that VLK has limited influence over investment managers' investment practices where assets are held in pooled funds, but ESG factors and associated risks are managed as a consequence of the following:

- Each investment manager appointed by VLK is assessed based on international conventions and initiatives, such as UN Global Compact and the Principles for Responsible Investment (PRI)
- Each investment manager is also assessed against more specific ESG criteria, for example:
  - does the manager have a responsible investment policy
  - is the manager open for a dialogue on ESG, and
  - how well does the manager adhere to VLK's own responsible investment policies, for example does the manager have exposure to companies that are on VLK's exclusion list (the current lists are available in the responsible investment section of VLK's website)?
- All investment managers are then further reviewed against ESG criteria on an ongoing basis. For example:
  - do ESG considerations continue to be integrated into their investment process
  - is the fund manager making progress
  - is the fund manager well informed and up-to-speed on ESG criteria and initiatives
  - screening of all underlying equity and debt securities during quarterly monitoring cycle to check for exclusion candidates

As a result, the Trustee is satisfied that VLK is providing advice and implementation services that are aligned with the investment strategy and the investment beliefs of the Trustee.

## Stewardship

The Trustee recognises its responsibilities as an owner of capital, and believes that good stewardship practices, including monitoring and engaging with investee companies, and exercising voting rights attaching to investments, protect and enhance the long-term value of investments.

The Trustee has appointed VLK as an Investment Advisor and Fiduciary Manager, and thus a considerable degree of decision making with regards to the Plan's asset allocation and investment manager selection is delegated to VLK. Furthermore, the Plan's investment strategy is typically implemented by VLK using investment managers who operate pooled investment funds, whereby the Plan's assets are aggregated with those of other investors. As a result, direct control of the process of engaging with the companies that issue securities in which the Plan is invested, whether for corporate governance purposes or social, ethical or environmental factors, is delegated via VLK to the investment manager of the pooled investment fund. The investment managers, acting on behalf of the Trustee, are expected to have an interest in ensuring that corporate management act in the long-term interests of shareholders or bondholders and hence will, where appropriate and possible, engage with management.

The Trustee has therefore adopted a policy of delegating voting decisions on stocks to their investment managers who will exercise the voting rights attached to individual investments on their behalf in accordance with their own voting and engagement policies. The Trustee also expects VLK to undertake monitoring and engagement with the underlying investment managers, in line with its' own responsible investment policies.

The Trustee will review annual reports on the voting undertaken by the underlying manager during the period to get assurance that it remains broadly consistent with the Trustee's view of good stewardship standards. However, the Trustee is conscious that the underlying manager may not be able to provide voting records for all investment held within certain pooled structures.

## Fee Structures

The Trustee recognises that the provision of investment management, implementation and advisory services to the Plan results in a range of charges to be met, directly or indirectly, by deduction from the Plan's assets.

The Trustee has agreed Terms of Business with the Plan's Professional Advisers, under which charges are calculated on a fixed fee or "time-cost" basis as appropriate.

VLK levies a fee based on the value of the assets managed by the Fiduciary Manager which covers the design, implementation, monitoring and review of the investment strategy. This fee structure helps align the Trustee's policies and investment priorities. The Trustee periodically checks the fee structure against similar providers to ensure it remains appropriate in relation to the services provided and to ensure it incentivises VLK to align its strategy and decisions with the Trustee's investment policy.

VLK is responsible for the negotiation of the fees of underlying investment managers, accepting limited ability to do so in respect of illiquid funds held by the Plan subject to agreements entered into by the former investment consultant and fiduciary manager. Their fees are based on a percentage of the value of the assets under management. VLK ensures their fee rates are consistent with the managers' general terms for institutional clients and is responsible for ensuring the underlying managers policies are aligned with or consistent with the Trustee's policies and objectives. However, it is recognised that investments in pooled funds offer limited scope to tailor strategies and decisions to the Trustee's specific policies.

The fee structure used in each case has been selected with regard to existing custom and practice, and the Trustee's view as to the most appropriate arrangements for the Plan. However, the Trustee will consider revising any given structure if and when it is considered appropriate to do so.

## Realisation of Assets

VLK has discretion over the timing of the realisation of portfolios managed by the selected underlying investment managers, with the exception of a number of illiquid funds that were invested in by the former investment consultant and fiduciary manager, where there is limited ability to realise liquidity. The underlying investment managers have discretion over the timing of realisation of investments of the Plan within the portfolios that they manage, and in considerations relating to the liquidity of investments.

When appropriate, the Trustee, on the administrators' recommendation, decides on the amount of cash required for benefit payments and other outgoings and informs VLK of any liquidity requirements. The preference of the Trustee is for investments that are readily realisable, but recognises that achieving a well-diversified portfolio may mean holding some investments that are less liquid (e.g. property and infrastructure assets). In general, the Trustee's policy is to use cash flows to rebalance the Plan's assets towards the strategic asset allocation, and also receive income from some of the assets where appropriate. The majority of the assets are held in liquid pooled funds, most of which can be realised easily if necessary.

## Investment Restrictions

The Trustee's policy is to invest predominantly on regulated markets, with investments on non-regulated markets kept to a prudent level. The Trustee has delegated responsibility to the Fiduciary Manager to monitor and manage the Plan's assets in line with a list of guidelines and investment restrictions. These are set out in a Fiduciary Management Agreement ("FMA"). The Trustee reviews these guidelines which have been agreed with the Fiduciary Manager from time to time and at least annually. The guidelines can only be changed with the consent of the Trustee.

The Trustee has given instructions to the Fiduciary Manager to prohibit investment in securities (e.g. equity, debt or preference shares) of Holcim Group or any of its subsidiaries. Investment in Holcim Group in respect of indirect investment

in pooled or tracker funds is permitted but restricted to levels defined by the Pensions Act 1995 and the Occupational Pension Schemes (Investment) Regulations 2005.

## Derivatives

Derivatives or other financial instruments may be used to hedge the Plan's liability risks (principally interest rate, inflation and longevity risks) or other risks (e.g. equity or currency risks). At any given time a minimum level of assets of sufficient liquidity and quality will be held to ensure the Plan is able to satisfy collateral or margin calls which may arise as a result of the derivatives positions it holds.

This SIP is adopted by the Trustee with effect from: \_\_\_\_\_

Signed ..... Name .....

for and on behalf of Lafarge UK Pension Trustees Limited acting as Trustee of Non-LRPS Section of the Lafarge UK Pension Plan.

## Appendix A: Responsibilities

### The Trustee

The principal responsibilities of the Trustee in relation to investments include but are not limited to:

- Determining an appropriate division of responsibilities.
- Appointing, monitoring and removing third party service providers, for example investment advisors such as the Fiduciary Manager, taking appropriate external advice where appropriate.
- The level of delegation afforded to the Investment Advisor or any other advisor.
- Setting an investment policy consistent with relevant legislation, which consists of:
  - A strategic investment objective.
  - Agreeing an investment strategy designed to meet the investment objectives of the Plan.
  - A strategy for hedging key risks.
  - Reviewing the suitability of the investment policy following the results of each actuarial or investment review, in consultation with investment advisors.
  - Assessing the ongoing effectiveness of the investment advisors and the underlying investment managers.
- Consulting with the Principal Employer when reviewing investment issues.
- Monitoring compliance of the investment arrangements with this SIP on an ongoing basis.
- Advising the investment advisors of any changes to Plan benefits and significant changes in membership.

### Fiduciary Manager

The Fiduciary Manager is responsible for all aspects of advising on and implementing the Trustee's investment plan. The Fiduciary Manager is required to exercise its powers having regard to the criteria for investment as set out in the Occupational Pension Plans (Investment) Regulations 2005. They select and liaise with asset managers and other service providers on behalf of the Trustee, and monitor the Plan's assets to ensure compliance with the agreed parameters and objectives. The Fiduciary Manager's powers and responsibilities are specified in the Fiduciary Management Agreement ("FMA").

The Fiduciary Manager's principal responsibilities in an investment advisory capacity include, but are not limited to:

- Advising the Trustee on this SIP and the investment policy, taking into account the liabilities of the Plan and the view that the Trustee has formed regarding the covenant of the Employer.
- Advising the Trustee how any changes within the Plan's benefits, membership and funding position may affect the manner in which the assets should be invested.
- Advising the Trustee of any changes in the investment environment that could either present opportunities or problems for the Plan.
- Undertaking reviews of the Plan's investment arrangements including reviews of the investment strategy and the investment managers the Plan is invested in, as appropriate.
- At their discretion, but within any guidelines given by the Trustee, implementing changes in the asset mix and selecting and undertaking transactions in specific investments within each asset class to achieve the investment objectives.
- Providing the Trustee with sufficient information each quarter to facilitate the review of its activities.

The Fiduciary Manager's principal responsibilities in an investment implementation capacity, include but are not limited to:

- Appointing and monitoring a custodian for the Plan. Where pooled vehicles are used, the custodian for the pooled vehicles is selected by the manager of the pooled vehicle.
- Implementing and managing the Plan's investments in accordance with the investment plan. In particular:
  - Rebalancing the assets to maintain compliance with the investment plan.

- Appointing, monitoring and dismissing investment managers (except in cases where the Trustee retains responsibility for this either because the Fiduciary Manager is itself acting as an investment manager, or because the Trustee decides to retain this responsibility for other reasons).
- The current Fiduciary Manager was appointed on 1 September 2025. Their portfolio includes a number of holdings that were invested by the former Fiduciary Manager and Investment Consultant, which are now illiquid and cannot be reasonably sold without material discounts to their net asset values. The Fiduciary Manager will advise the Trustee on the ongoing merits of retaining these positions against the potential costs of selling them.
- Entering into legal agreements on behalf of the Plan, including for derivative transactions and for investment management, obtaining legal advice where appropriate.
- Monitoring the Plan's investments and informing the Trustee immediately of:
  - Any breach of this SIP that has come to their attention.
  - Any serious breach of internal operating procedures.
  - Any material change in the knowledge and experience of those involved in managing the Plan's investments.
  - Any breach of investment restrictions.
- Making provision for the Plan's cash flow requirements, based on projections provided by the Plan's administrator and as agreed with the Trustee.

Long term insurance contracts which transfer some or all of the risk of the assets failing to meet the liabilities of the Plan, such as buy-out / buy-in policies or longevity insurance, form an integral part of the investment strategy. The Trustee has not delegated the decision to enter into long term insurance contracts to its Fiduciary Manager, nor monitoring of existing longevity swap instruments.

### Investment Managers

The investment managers will be responsible for, amongst other things:

- Ensuring that assets under their control are at all times managed against appropriate market benchmarks.
- When necessary making changes to their portfolio to ensure that the range of investments used is optimal and in accordance with their stated strategy.
- Ensuring that at all times they act within their agreed investment guidelines and terms as defined in the Prospectus (as amended).
- Ensuring that all investment decisions are reported in a timely and accurate manner.

### Legal advisor

When they consider it necessary, the Trustee will seek legal advice in relation to investments including, but not limited to:

- Advice on agreements with respect to the appointment of Professional Advisors.
- Advice on the SIP and on other legal aspects of investment governance.
- Advice on investment management agreements for managers appointed by the Trustee directly (though in most cases appointments are made by the Fiduciary Manager who obtain their own legal advice).

### Scheme Actuary

The Actuary's responsibilities in relation to investments include, but are not limited to:

- Performing the triennial (or more frequently as required) actuarial valuations and advising on the appropriate contribution levels and any recovery plan.
- Liaising with the Fiduciary Manager on the suitability of the Plan's investment strategy given the characteristics of the liabilities.
- Advising the Trustee and the Fiduciary Manager of any changes to contribution levels and funding level.

- Providing liability data to the Fiduciary Manager as necessary and confirming any market-derived assumptions used to value the Plan's liabilities, to assist the Fiduciary Manager with interpreting its own estimates of the Plan's funding position.

## Appendix B: Risks

When deciding to invest the Plan's assets, the Trustee considers a number of risks, including, but not limited to those set out below. The management of investment risk is a function of the asset allocation and diversification strategies and implementation of that strategy is delegated to the Fiduciary Manager.

### Strategic risk

This is the risk that the performance of the Plan's assets and liabilities diverges in certain financial and economic conditions. This risk is managed in the following ways:

- A liability benchmark is used as a proxy for the liabilities in order to measure the approximate changes in the liabilities. The Trustee monitors this change relative to the change in asset values on a regular basis.
- The Trustee also recognises the risks of a negative impact on the funding level due to changes in the actuarial assumptions used to calculate the liabilities and variation in experience. This is managed by aiming for a higher overall investment return than implied by the liability discount rate.
- When setting and reviewing investment strategy, the Trustee examines how the investment strategy impacts on downside risk. Downside risk of the investment strategy is also measured by reference to the liabilities and can therefore also be assessed as part of the regular review process.
- The Trustee will review the Plan's investment strategy regularly and at least every three years in light of the various risks faced by the Plan.

### Investment manager risk

The failure by the Fiduciary Manager and/or its selection of underlying investment managers to achieve the rate of investment return assumed by the Trustee. This risk has been considered by the Trustee on the initial appointment of the fiduciary and investment managers and thereafter will be considered as part of the investment review procedures the Trustee has put in place. This risk is also minimised using the following techniques:

- Appropriate diversification across asset classes and geographies to minimise the effect of a particular asset class underperforming.
- The use of instruments and strategies designed to control the extent of downside risk.
- The selective use of active management when appropriate given market conditions, the asset class considered and where the benefits (risk and/or return) are expected to outweigh the additional costs/fees.
- Regular monitoring of performance, by both the Trustee and the Fiduciary Manager.

### Active manager risk

The Trustee understand that the use of active, rather than passive management introduces additional risk. Where active management is adopted, the Trustee deems the risk to be acceptable in the context of the Plan's overall investment risk profile.

### Concentration risk

This is the risk that failure of a particular investment, or the general poor performance of a given investment type, could materially adversely affect the Trustee's ability to meet their investment objectives.

The Trustee believes that the need for the Plan's assets to be adequately diversified between different geographies, asset classes and underlying investment managers has been met by the investment strategy outlined in Section 3 and by the investment guidelines agreed with the Fiduciary Manager where the Fiduciary Manager aims to ensure that the Plan's investments are placed in an adequately diversified portfolio. To help diversify investment manager risk, the Trustee understands that the Fiduciary Manager may make multiple manager appointments within some asset classes.

### Currency risk

Whilst the majority of the currency exposure of the Plan's assets is to Sterling, the Plan is subject to currency risk because a proportion of the Plan's investments are held in overseas markets. The Fiduciary Manager on behalf of the Trustee considers the overseas currency exposure in the context of the overall investment strategy, and will reduce these risks as they deem appropriate via either a currency hedging program, or by making use of hedged share classes.

### Counterparty and derivative risk

Counterparty risk is reduced by investing the Plan's assets into pooled investment vehicles managed by competent investment managers with strong organisational and operational processes. In addition, and where securities are owned directly by the Plan, the Trustee has appointed a Custodian, Northern Trust, to mitigate the risk of misappropriation of such assets. The Custodian ring fences these assets from its own assets and from those of its other clients.

Where derivatives are used by the Plan, the Plan will have additional risk with the counterparty to that derivative. These risks are managed through the use of collateral arrangements with each counterparty.

### Interest rate and inflation risk

The Plan's assets are subject to interest rate and inflation risk because a portion of the Plan's assets are held either directly or indirectly in government bonds, interest rate and inflation swaps and other fixed income instruments such as corporate bonds. However, the interest rate and inflation exposure of the Plan's assets hedges part of the corresponding risks associated with the Plan's liabilities. The net effect will be to reduce the volatility of the funding level, and so the Trustee believes that it is appropriate to have exposures to these risks in this manner.

### Liquidity risk

This is the risk that the Plan is unable to realise assets to meet benefit cash flows as they fall due. To mitigate this risk, Trustee and its Professional Advisors will seek to ensure that the Plan has sufficient cash to meet the likely benefit outflow from time to time. The Trustee and its Professional Advisors will also ensure that there are sufficient investments in liquid or readily realisable assets to meet unexpected cash flow requirements so that realisation of assets will not disrupt the Plan's overall investment plan where possible.

### Environmental, social and governance risks

Environmental, social and corporate governance (ESG) factors are sources of risk to the Plan's investments which could be financially material, over both the short and longer term. These potentially include risks relating to factors such as climate change, unsustainable business practices, and unsound corporate governance.

### Other non-investment risks

The Trustee recognises that there are other, non-investment, risks faced by the Plan. Examples include:

#### Longevity risk

Demographic factors include the uncertainty surrounding mortality projections such as future improvements in mortality experience. The Trustee recognises that there is currently no readily-tradable instrument to hedge this type of risk and that this risk may not be fully mitigated. The Trustee will measure liabilities using mortality assumptions recommended by the Scheme Actuary.

#### Covenant risk

The risk that, for whatever reason, the sponsoring employer is unable to support the Plan as anticipated. The Trustee also has an agreement with the Employer to receive notification of any events which have the potential to alter the creditworthiness of the sponsoring employers. In particular, the Trustee will be informed of Type A events, as defined in appropriate guidance issued by the Pensions Regulator, and employer-related Notifiable Events. On receipt of such notification, the Trustee will reconsider the continued appropriateness of the Plan's existing investment strategy.

Together, the investment and non-investment risks give rise generally to funding risk. This is the risk that the Plan's funding position falls below what is considered an appropriate level. By understanding and considering each of the risks that contribute

to funding risk, the Trustee and their Professional Advisors believe that they have addressed and are positioned to manage this general risk.

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