S.E.H. EUROPE RETIREMENT BENEFITS PLAN

STATEMENT OF INVESTMENT PRINCIPLES

JULY 2026

TABLE OF CONTENTS

1 INTRODUCTION

This Statement of Investment Principles (the “Statement”) has been prepared by the Trustees of the S.E.H. Europe Retirement Benefits 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 Plan’s investment policy 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 consultant, 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.

This Statement supersedes all previous versions of the Statement.

2 INVESTMENT OBJECTIVES

The Trustees' primary objective is to endeavour to meet their obligations to the beneficiaries both in the short and long term, whilst minimising risk as far as possible. To this end, all of the Plan's assets were used to fund the purchase of a bulk annuity contract with Pension Insurance Corporation plc ("PIC"). The Trustees entered the bulk annuity contract with PIC in June 2026 to secure 100% of the Plan's known liabilities. Under this contract the insurer is obligated to make payments to the Trustees to meet the Plan's liabilities to those beneficiaries insured under the policy.

The Trustees selected PIC as the Plan's annuity provider having obtained and considered the written advice of Lane Clark & Peacock LLP ("LCP"), whom the Trustees considered to be suitably qualified to provide such advice at the time of entering the contract. The advice received and arrangements implemented are, in the Trustees' opinion, consistent with the requirements of Section 36 of the Pensions Act 1995 (as amended).

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.

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 investment managers and investment adviser (it is not expected that an investment manager will be appointed given the bulk annuity contract that is in place)
- The compliance of the investment arrangements with the principles set out in this 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 to the Trustees include the following (albeit given the bulk annuity that is now in place some services may not be required):

- Setting of investment objectives
- Determining investment strategy and asset allocation
- Determining an appropriate investment structure
- Advising on investment managers that are suitable to meet the Trustees' objectives
- Setting cashflow management (investment and disinvestment) policies

The Trustees may seek advice from Mercer regarding 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. 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 is 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. The Trustees believe 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 SUMMARY OF RESPONSIBILITIES

A summary of the responsibilities of all relevant parties, including the Scheme Actuary and the Plan's administrator, so far as they relate to the Plan's investments.

4 INVESTMENT STRATEGY

The Trustees have adopted the following investment strategy for the Plan, which has been effective since June 2026:

Portfolio	Allocation	Description
Bulk Annuity	**100.0**	Buy-in contract under which the insurer is obligated to make payments to the Trustees to meet the Plan's liabilities.

The Plan holds an insurance policy written by PIC, which is authorised by the Prudential Regulation Authority ("PRA") and regulated by the PRA and the Financial Conduct Authority ("FCA"). Under the policy, PIC are obligated to make payments to the Trustees to meet the Trustees' liabilities to the Plan's beneficiaries, in respect of the benefits insured under the policy. PIC's liabilities are to the Trustees and not to the underlying beneficiaries at the present time.

4 RISKS

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. The Trustees are aware of, and pay close attention to, a range of risks inherent in investing the Plan's assets. The Trustees have sought to mitigate key risks by the purchase of the bulk annuity contract. The Trustees believe the following risks may be financially material over the future lifetime of the Plan (i.e. before completing buy-out and windup):

Failure of the bulk annuity provider (counterparty risk)

- The risk thatPIC may default on their obligation under the buy-in contract.
- To mitigate this risk, before entering the buy-in contract, the Trustees took appropriate advice and paid close attention to the financial strength, security and operational soundness of the chosen annuity provider at the point of purchase. In addition, the Trustees are aware that regulatory oversight and ultimately, the Financial Services Compensation Scheme, provide a degree of statutory protection to policyholders of long-term insurance contracts such as the bulk annuity policy, in the event that an insurer gets into financial difficulty or becomes insolvent.

Illiquidity Risk

- The Trustees do not expect to be able to obtain cash from the buy-in policy other than to meet promised benefits as agreed with the PIC.
- The Trustees have therefore ensured that the contract meets all required benefits. The Trustees have also considered this and set aside a small amount of cash, held in the Trustee Bank Account, to meet expenses and other potential liquidity needs.

Diversification Risk

- The Trustees recognise that the decision to invest in a bulk annuity contract with a single provider represents a concentration of risk.
- After scrutiny of the provider prior to transacting, the Trustees are satisfied that the degree of risk taken is acceptable.

5 DAY TO DAY MANAGEMENT OF ASSETS

The Trustees have appointed PIC as their annuity provider having obtained and considered written advice from their adviser, LCP and their legal adviser, Addleshaw Goddard, who the Trustees consider to be suitably qualified to provide such advice.

In this context, relevant investment advice relates to that provided in accordance with the requirements of Section 36 of the Pensions Act 1995 (as amended).

The Plan’s liabilities are met by the annuity contract with PIC. PIC are responsible for the realisation of assets within the bulk annuity contract, to make the payments due under the contract.

Any further investments and disinvestments from the Plan will be at the discretion of the Trustees.

The Trustees also hold cash within the Trustee Bank Account for ongoing expenses and any additional premium following the completion of the data cleanse period.

6 ADDITIONAL VOLUNTARY CONTRIBUTIONS (AVCS)

The Trustees have historically provided for AVC facilities to be made available for members.

The Plans' AVC arrangement is provided by Standard Life and a range of unit-linked managed fund options, with-profit funds and a cash fund are made available to members.

The Trustees believe it is appropriate to continue holding these funds in the short-term. They will take advice in due course on an approach to discharging these ahead of Plan's wind-up.

7 RESPONSIBLE INVESTMENT AND CORPORATE GOVERNANCE

The Trustees believe that environmental, social and governance ("ESG") factors may have a material impact on investment risk and return outcomes and that good stewardship can create and preserve value for companies and markets as a whole. The Trustees also recognise that long-term sustainability issues, particularly climate change, present risks and opportunities that increasingly may require explicit consideration.

However, since the Plan's principal asset is a bulk annuity contract, it is not possible in practice to take ESG factors into account in the retention and realisation of these investments. As noted above, the Trustees obtained and carefully considered professional advice before entering into the bulk annuity contract, including the selection of PIC as insurer.

Given the nature of the Plan's investment policy, member views and non-financially material considerations are not taken into account in the selection, retention and realisation of investments.

In addition, there are no voting rights attached to the annuity contract, so the control of corporate governance issues has been ceded by the Plan to PIC.

8 MONITORING INVESTMENT ADVISER

The Trustees continually assess and review the performance of their adviser, Mercer.

To do so, the Trustees consider the objectives they set for its investment adviser in the document entitled "Strategic Objectives for Investment Consultancy Services" which was signed and formally first adopted by the Trustees in October 2019.

The Trustees are required to review the objectives at least every three years and following any significant changes in the Plan's circumstances and assess Mercer against the objectives on an annual basis.

9 COMPLIANCE

This Statement is available to members online and supersedes all others.

Approved by the Trustees on ……5th August 2026**…………………………….**