

The Christie Pension and Life Assurance Scheme (Devon Section)

Statement of Investment Principles

March 2026

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1. Introduction

1.1 Scheme Background

- This Statement of Investment Principles (the “Statement”) details the principles governing the decisions for the Christie Pension and Life Assurance (Devon section) scheme, the “Scheme”.
- The Scheme operates for the exclusive purpose of providing retirement and death benefits to eligible participants and beneficiaries.
- The Scheme provides benefits on a final salary basis. The final salary section is closed to new members and to future accrual. This Statement relates solely to the final salary section of the Scheme.
- When required, the Trustees receive written investment advice from suitably qualified members of the Board of Trustees, as well as independent members of the Audit & Finance Committee who for the purposes of the SIP fulfil the role of investment consultant.
- The Scheme’s liabilities have been insured in full by ‘Just Retirement Ltd’, ‘the Insurer’, however this is a “Buy-In” and is yet to be finalised as a “Buy-Out” there may be some adjustment, either up or down to the liabilities.

1.2 Statement Structure

This Statement is divided into two main sections as follows:

- **Statutory Section:** This section covers the requirements of, and the Scheme's compliance with, the provisions of the Pensions Act 1995 as amended by the Pensions Act 2004.
- **Myners Section:** This section includes additional non-statutory information that the Myners Principles recommended are included in a strengthened Statement.

2. Statutory Information

2.1 Introduction

- This section of the Statement covers the requirements of the Pensions Act 1995 and Pensions Act 2004 as amended by the occupation at pensions scheme (investment) regulations. In accordance with section 35 of the Pensions Act 1995, the Trustees have reviewed and considered written advice from the investment consultant prior to the preparation of this Statement and have consulted the Principal Employer before agreeing with the investment managers the investment strategy outlined in this document
- The Trustees have full regard to their investment powers under the Trust Deed and Rules and the suitability of types of investments, the need to diversify, the custodianship of assets and any self-investment.
- The investment managers will prepare detailed quarterly reports on their activities and custodianship, and the Trustees will meet with them as required.
- This Statement will be reviewed periodically or whenever changes to the Principles or strategy are necessary, including any appointment or review of the investment managers.
- Any changes to this Statement will be undertaken on the advice of authorised investment consultants.
- All investment decisions of the Scheme are under the control of the Trustees, with no constraint by the Principal Employer. The Trustees have consulted with the Principal Employer over this Statement.
- The Trustees will examine regularly whether additional investment training is desirable for any individual Trustee.

2.2 Statutory Requirements

This part of the Statement details the Trustees' policy to secure compliance with the requirements of Sections 35 and 36 of the Pensions Act 1995 and Sections 244-246 of the Pensions Act. 2004

1.1.1 Investment Objectives and Suitability of Investments:

- Now that the liabilities have been transferred to Just via a buy-in, the investment strategy for the remaining monies is cautiously designed, investing only in money market funds.
- Now that the benefits of members have been secured, the primary objective of the Trustees is to protect capital and provide liquidity until a scheme buy-out is complete.
- The Trustees have translated their objective into a suitable strategic asset allocation benchmark for the Scheme, details of which are included in the appendices.
- In accordance with the Financial Services & Markets Act 2000, the Trustees are responsible for setting the general investment policy, but the responsibility for all day-to day investment management decisions has been delegated to investment managers authorised under the Act. Details are included in the appendices.
- The Trustees consider their current strategic asset allocation to be consistent with the current financial position of the Scheme. This judgement is made with reference to the technical provisions set out in the Scheme's 'Statement of Funding Principles'.
- The Trustees are satisfied that the investments selected are consistent with their investment objective, particularly in relation to diversification, risk, expected return and liquidity.

1.1.2 Risk

- The Trustees consider the main risk to be that the insurer fails to meet the liability requirements as they have promised.
- In the event of the insurer failing to meet the liabilities, the employer covenant and surplus assets will be required if the FSCS (Financial Services Compensation Scheme) compensation is not sufficient or timely.

Liquidity risk

- It is important for a defined benefit scheme to maintain sufficient liquidity to meet the liability payments as they are due.

- Liquidity risk is negligible to the scheme since it is now the insurer's responsibility to make payments to the members.

Other Risks

- Assuming the insurer meets the liabilities as they come due, the only remaining risk is the risk related to investing the surplus assets. These risks include but are not limited to:
 - Inflation risk
 - Maturity risk
 - Investment risk
 - Timing risk
 - ESG risk
- As the residual assets are now invested in money market funds, the risk that the assets values are eroded by inflation is the most significant of these.

1.1.3 Financially material considerations

- The Trustees recognise that as the residual funds are now invested in money market funds that the practicalities of ESG investment are now severely limited. The Trustees' historic policy is set out below.
- The Trustees expect their investment managers, where appropriate, to have taken account of financially material considerations, including environmental, social and governance (ESG) factors as part of their investment analysis and decision-making process. The Trustees' primary concern is the financial performance of their investments, however the Trustees believe that ESG factors can have a material impact on risk and investment returns and so should be considered within the investment management process.
- The Trustees have been provided with the investment managers' policies in respect of financially material considerations and are satisfied that it is consistent with the above approach.

1.1.4 Non-financial matters

- Non-financial matters may be considered if the Trustees have good reason to think that a majority of the members would share the concern.

1.1.5 Stewardship in relation to the Scheme's assets

- The Trustees recognise that as the residual funds are now invested in money market funds, meaningful stewardship is not currently feasible. The Trustees' historic policy is set out below.
- The Trustees have a fiduciary duty to consider their approach to the stewardship of the investments, to maximise financial returns for the benefit of members and beneficiaries over the long term. The Trustees believe that they can promote an investment's long-term success through monitoring, engagement and/or voting, through their investment managers.

1.1.6 Engagement and monitoring

- As the residual funds are now invested in money market funds meaningful engagement is no longer feasible. The Trustees' historic policy is set out below.
- The Trustees recognises the importance of engagement and stewardship. The Trustees policy has been to delegate the day to day responsibility for engaging and monitoring investee companies to the investment managers who the Trustee believes is better placed and better resourced to make these engagements.
- The Trustees do not select the assets their managers invest in. This also extends to engagement whereby the Trustees do not directly engage with, nor do they give guidance to their asset managers to engage with specific companies for investment.
- The responsibilities the Trustees defer to the investment manager include, but are not limited to, the monitoring of capital structure of the companies they invest in. The Trustees avoid conflicts of interest both with engagement and other parties with an interest in companies they invest in by deferring the direct engagement to the investment managers.
- The Trustees, with the help of their advisors, periodically review the policies and actions of their investment managers to ensure they remain consistent with the Trustees policies.

1.1.7 Voting rights

- As the residual funds are now invested exclusively in money market funds, there are no voting rights attached to assets.

1.1.8 Policy for Asset Managers

- Asset Managers are paid based on a percentage of Assets Under Management(AUM). This incentivises an alignment of interests of achieving long term returns that, in conjunction with contributions, allow the Trustees to pay all benefits due.
- Contracts with investment managers are not under a fixed term and managers can be replaced if at any point the Trustees and their advisors believe they are not acting in member's best interests.
- The Trustees review their asset manager's beliefs to ensure they are in line with their own. The Trustee is satisfied that they are aligned in beliefs in how to make decisions based on long-term financial and non-financial performance of companies.
- Investment performance is monitored at least quarterly and reviewed at least annually.
- Performance is reviewed by the Trustees on at least a quarterly basis. The Trustees take a long term performance outlook of at least 5 years; however they review managers regularly to identify any potential issues.
- Day to day costs for investments, including turnover costs, are managed by the asset manager. The Trustees, with the assistance of their advisors, periodically reviews costs to ensure they are appropriate and in line with market rates.

2. Myners Principles

The original Myners review "Institutional Investing in the UK" was published in March 2001. It included a set of 10 Principles that pension scheme trustees are recommended to use when considering their investment policy for final salary pension and 11 Principles for money purchase schemes. The Government endorsed the report with some minor modifications in October 2001. Pension scheme trustees were asked to comply with the Principles on a voluntary basis. The Myners Principles recommend that certain issues are included in the Statement.

The Myners Principles were subsequently reviewed in October 2008 and specific reference to the Statement was removed and replaced with a requirement for Trustees to act in a transparent and responsible manner. In making the following statements the Trustees believe that they are complying with the spirit of these Principles.

2.3 Defined Benefits

2.1.1 Responsible ownership

Details of the Trustees responsible ownership policies (including the exercising of voting rights) attaching to the Scheme's investments are included in Sections 2.2.8 to 2.2.12.

2.1.2 Transparency and Reporting

The Trustees have discretion over the form of reporting they wish to undertake. This Statement provides the following details of the Trustees' investment approach:

- Who is taking which decisions and why has the structure been selected?

Details of the Trustees' decision-making structure are included in section 2.1

- The Trustees' investment objective.

Details of the Trustees' investment objective are included in section 2.2.1, with the appointed managers' specific objectives in Appendix 1.

- The Trustees' asset allocation strategy, including projected investment returns in each asset class, and how the strategy has been selected.

Details of the Trustees' asset allocation strategy are included in Appendix 1. The strategy was constructed following consultation with the Trustees' advisors, and included consideration of the likely range of returns from each asset class.

- The mandates given to all advisers and investment managers.

The responsibilities of the Trustees, investment managers, investment consultant, advisors and the Insurer are outlined in section 3.2, while the investment managers' mandates are specified in Appendices 1 and 2.

- The nature of the fee structures in place for all advisers and investment managers; and why this set of structures has been selected.

Details of the fees charged by the investment consultant and investment managers are included in Appendix 2. The Trustees have discussed and agreed these fees following consultation with their adviser, where appropriate, and believe they are reasonable for the services they receive.

2.4 Appointments & Responsibilities

2.1.3 Trustees

The Trustees' primary responsibilities include:

- Preparation of the Statement of Investment Principles, review of the content of the Statement and modification of it if deemed appropriate, in consultation with the Principal Employer and investment consultant, at least every three years or more frequently if there has been a significant change in investment policy.
- Appointing investment managers, investment consultants and actuaries as necessary for the good stewardship of the Scheme.
- Reviewing the investment strategy following the results of each actuarial review, and/or asset liability modelling exercise, and/or significant changes to the Scheme's liabilities, in consultation with the investment consultant and Scheme Actuary.
- Assessing the performance and processes of the investment managers and insurance policies by means of regular, but not less than annual, reviews of investment performance and other information, in consultation with the investment consultant.
- Monitoring compliance of the investment arrangements with this Statement on a regular basis.

- Monitoring risk and as and when required the manner in which the investment managers have cast votes on behalf of the Trustees in respect of the Scheme's equity holdings.
- Monitoring the insurer to ensure that payments of liabilities are met in full and on time until buy-out is achieved.

2.1.4 Investment Advice

When required, the Trustees receive written investment advice from suitably qualified members of the Board of Trustees, as well as independent members of the Audit & Finance Committee. This advice includes:

- The hiring, replacing and retention of appropriate managers and investments for the scheme.
- Monitoring the investments for continued suitability

2.1.5 Investment Managers

The investment managers' main responsibilities include:

- Investing assets in a manner that is consistent with the objectives set.
- Ensuring that investment of the Scheme's assets is in compliance with prevailing legislation and within the constraints detailed in this Statement.
- Providing quarterly reports including a review of the investment performance and any changes to their investment process.
- Attending meetings with the Trustees as and when required.
- Informing the Trustees of any changes in the internal performance objective and guidelines of any pooled fund used by the Scheme as and when they occur.
- Exercising voting rights on shareholdings in accordance with their general policy.

2.1.6 Custodian

- The custodianship arrangements are those operated by the investment managers for all clients investing in their pooled funds.

2.1.7 Administrators

- The Scheme's administration is carried out by Capita

2.1.8 Scheme Actuary

The Scheme Actuary's main responsibilities include:

- Commenting on the suitability of the Scheme's investment strategy given the financial characteristics of the Scheme.
- Performing the triennial (or more frequently as required) valuations and advising on the appropriate level of contributions and the Scheme's funding level in order to aid the Trustees in balancing short-term and long-term objectives.
- Assessing the funding position of the Scheme and advising on the appropriate response to any shortfall.
- The Scheme Actuary Mr Martin West FIA, of Capita.

2.1.9 Insurer

The Insurer's main responsibilities include, but aren't limited to:

- Meeting payments of the liabilities in full and on time.

2.5 Investment Monitoring

2.1.10 Performance Monitoring

- Each of the vehicles in which the Scheme invests has a stated performance objective by which the performance is measured.
- The Trustees will review the performance of the appointed investment managers from time to time, based on the results of their performance and investment process.
- The investment managers are expected to provide written reports on a quarterly basis, and report verbally on request, to the Trustees.

Appendix 1 — Strategic Benchmark and Objectives

Total Scheme Strategic Benchmark for surplus assets

The current strategic asset allocation for the Scheme for assets that are not invested in insurance policies to meet the liabilities is set out below.

The Trustees have appointed Rothschild & Co

Performance objectives relative to the specified benchmark Index for each of the Scheme's investment managers and funds are outlined below. All performance objectives (except for passively managed funds) are net of fees and measured over rolling three-year periods, unless otherwise stated.

Manager	Asset Type	Current Allocation (%)	Investment Style	Performance Objective
Rothschild & Co	Money Market	100	Overnight Deposits	SONIA
Total		100		

Appendix 2 — Fees

			(% p.a.)
Rothschild	Money Market		Nil

Review Record

This document is reviewed on behalf of the Trustee at least annually. The following table records changes to this document:

Document Change/Revision Record

Revision Date	Version	Stage	Comments	Reviewer	Approval Date
30 Sept 2019	V1	Revision	Reviewed	Trustee	30 Sept 2019
Nov 2022	V2	Revision	Updated to reflect regulatory changes	Trustee	
October 2023	V3	Revision	Update to reflect material change in scheme	Trustee	
March 2026	V4	Revision	Update to reflect move to buy-in and liquidation of investments	Trustee	

This document has been reviewed on behalf of the Trustee at least annually, most recently on: