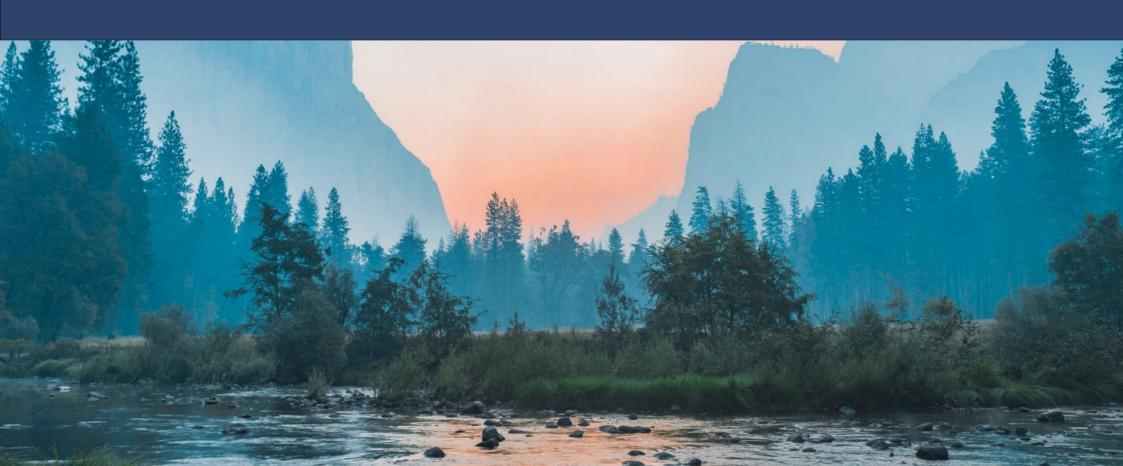
Statement of Investment Principles

For the Hanson Industrial Pension Scheme

Effective from: 3 July 2024



1. Introduction

This Statement of Investment Principles ("SIP") has been produced by HIPS (Trustees) Limited ("the Trustee").

It sets out the Trustee's policies on various matters governing investment decisions for the Hanson Industrial Pension Scheme ("the Scheme"), which has Defined Benefit ("DB") and Defined Contribution ("DC") sections.

This SIP replaces the previous SIP dated July 2023.

This SIP has been prepared after obtaining and considering written advice from LCP, the Trustee's investment adviser, whom it believes to be suitably qualified and experienced to provide such advice. The advice considered the suitability of investments including the need for diversification given the circumstances of the Scheme and the principles contained in this SIP.

The relevant employer has been consulted in producing this SIP.

The Trustee will review this SIP from time to time and will amend it as appropriate. Reviews will take place without delay after any significant change in investment policy or in the demographic profile of the members invested in the DC default investment option and at least once every three years.

This SIP contains the information required by legislation, and also considers the Pension Regulator's guidance on investments.

The Trustee has produced a separate SIP addendum document, which details further background and other matters relevant to the Scheme's investments, but which are not required to be included in the SIP.

2. Investment objectives

The primary objective for the **DB Section** is to ensure that the benefit payments are met as they fall due. In addition to this primary objective, the Trustee has the following objectives:

- the expected return on the Scheme's assets is maximised whilst managing and maintaining investment risk at an appropriate level.
- that over the long-term the Scheme should be funded on a solvency basis (i.e. the asset value should be at least as much as the estimated cost of securing all the Scheme benefits with an insurance company) and should adopt a low-risk long-term investment strategy.

The Trustee's objectives for the **DC Section** are to:

- provide an appropriate range of investment options, including what
 the Trustee believes is a suitable range of lifestyle options that
 switch members' funds automatically in the periods approaching
 retirement reflecting the membership profile of the DC section and
 the variety of ways that members can draw their benefits in
 retirement;
- select appropriate fund managers, unitised funds and/or insurance companies to manage each of the investment options;
- inform members about their investment options, particularly in relation to the potential risks and rewards of each option; and
- provide a default investment option that the Trustee believes to be reasonable for those members who do not wish to select their own investment options (and who are permitted under the Scheme's rules to exercise such default). The objective of the main default option is to generate returns significantly above inflation whilst members are some distance from retirement, but then to switch automatically and gradually to lower risk investments as members near retirement with the asset allocation at retirement being designed to be appropriate for members who wish to flexibly access their savings through drawdown.

3. Investment strategy

With input from its advisers and in consultation with the employer, the Trustee has set the below investment strategy for the **DB Section**, considering the objectives described in Section 2 above.

Asset class	Benchmark allocation	Range
	%	%
Equities	3	1-5
Alternative investments	11	8-14
Total growth assets	14	9-19
Liability matching assets	<u>86</u>	81-91
TOTAL	<u>100</u>	

The table above does not take the Scheme's insured liabilities into account.

The Trustee's policy is to target the maximum expected return level subject to ensuring the level of investment risk is appropriate to reflect the DB Section's circumstances. The Trustee believes that the strategy above meets this objective.

The Trustee is aware that the DB Section's allocation to the various asset classes will differ to the benchmark allocation from time to time due to market movements. The Trustee will review the DB Section's asset allocation regularly and decide whether (or not) to rebalance back to the strategic benchmark, in particular when the asset allocation moves outside the indicated ranges.

For the **DC Section**, the Trustee offers members the choice of a range of self-select investment options that they can choose depending on their own personal circumstances and attitudes to risk.

The Trustee also offers three Lifestyle Strategies that automatically combine members' investments between different funds in proportions that vary according to the proximity to retirement age.

The HIPS Drawdown Lifestyle Strategy is the default option for members that do not want to make a choice on their own. The Trustee has also decided to retain the legacy lifestyle strategy, which was in place prior to the current default option being implemented, for members who were less than five years to retirement when the transition to the current investment arrangements was implemented in November 2014. These members have the option to switch to the new lifestyle

strategies if they choose. There were 39 members still invested in this strategy as at 31 December 2023.

4. Considerations in setting the investment arrangements

When deciding how to invest the Scheme's assets, it is the Trustee's policy to consider a range of asset classes, taking account of the expected returns and risks associated with those asset classes, as well as its beliefs about investment markets and which factors are most likely to impact investment outcomes.

The Trustee takes an integrated approach when assessing risk and reviewing the investment strategy. It takes account of the employer covenant, contributions, funding targets, liability profile (including interest rate and inflation sensitivities and the extent to which they are hedged) and the level of expected return and risk now and as the strategy evolves.

The primary ways that the Trustee manages investment risk are via diversification, ensuring it receives professional written advice prior to making any material investment decision, and its ongoing monitoring and oversight of the investments. Further details of specific risks (for example equity risk, credit risk and currency risk) and how the Trustee measures and manages those risks is set out in Part 2 of the SIP addendum.

In setting the strategy for the **DB Section**, it is the Trustee's policy to consider:

- Its investment objectives, including the target return required to meet these.
- The circumstances of the Scheme, including the projected profile of the benefit cash flows (and the ability to meet these in the near to medium term), the funding level, and the strength of the employer covenant.
- The need for appropriate diversification between different asset classes to manage investment risk and ensure that both the overall level of investment risk and the balance of individual asset risks are appropriate.

In determining the investment arrangements for the **DC Section**, including the default option, it is the Trustee's policy to consider:

- The overall best interests of members and beneficiaries.
- The profile of the membership and what this is likely to mean for the choices members might make upon reaching retirement.
- The need for appropriate diversification to manage investment risk within the default option and ensure that both the overall level of

investment risk and the balance of individual asset risks are appropriate.

• The need for appropriate diversification between and, where appropriate, within the other investment options offered to members.

The Trustee also considers other factors that it believes to be financially material over time horizons relevant to the funding of the DB and DC benefits, including environmental, social and governance ("ESG") factors and the risks and opportunities relating to climate change.

The Trustee's policy regarding investments in illiquid assets in the DC default arrangements, is set out below. Illiquid assets means assets that can't be easily or quickly be sold or exchanged for cash, and where assets are invested in a collective investment scheme this includes any such assets held by the collective investment scheme.

The default includes an allocation to diversified growth funds ("DGFs") via pooled funds (a type of collective investment scheme), that may include an allocation to illiquid assets if the DGF managers choose to do so. As at 31 December 2023, there was no exposure to the illiquid assets via the DGF allocation in the HIPS Active Diversified Fund. At the same date there was 10.3% allocation to direct global property via the Global Property allocation within the HIPS Passive Diversified Fund. Members of all ages invested in the default have exposure to the HIPS Active Diversified Fund and HIPS Passive Diversified Fund.

The Trustee's policy is to have exposure to DGFs with discretion to invest in illiquid assets within the default because its assessment is that, when compared to many other asset classes, illiquid assets offer members a potentially greater level of diversification and hence better risk management in the overall asset allocation. The Global Property mandate is expected to contain at least some exposure to direct property at all times. The Trustee also believes that long-term net risk-adjusted investment returns of the default may be improved by investing in illiquid assets.

The Trustee intends to consider the illiquid assets exposure further with the support of our investment advisers.

The Trustee's key investment beliefs, which influence the setting of the investment arrangements, are as follows:

- Asset allocation is the primary driver of long-term returns.
- Risk-taking is necessary to achieve return, but not all risks are rewarded. Equity, credit, and illiquidity are the primary rewarded risks. Risks that do not have an expected reward should generally be avoided, hedged, or diversified.

- ESG factors should be considered when making investment decisions, and managers may be able to improve risk-adjusted returns by doing this.
- Climate change is a financially material systemic issue that presents risks and opportunities for the Scheme over the short, medium and long term.
- Investment managers who can consistently spot and profitably exploit market opportunities are difficult to find, and therefore passive management is usually better value.
- Costs may have a significant impact on long-term performance and therefore obtaining value for money from the investments is important.
- Voting and engagement are important and can create long term value which is in the best interest of Scheme members and therefore the Trustee encourages managers to improve their voting and engagement practices.

5. Implementation of the investment arrangements

Before investing in any manner, the Trustee obtains and considers proper written advice from its investment adviser as to whether the investment is satisfactory, having regard to the need for suitable and appropriately diversified investments.

The Trustee has signed agreements with the investment managers, and a platform provider in respect of the DC Section, setting out the terms on which the portfolios are to be managed. The DC platform provider makes available the range of investment options to members. There is no direct relationship between the Scheme and the underlying managers of the DC investment funds. Details of the investment managers are set out in the separate SIP addendum.

Where the Scheme's assets are held in pooled funds, the Trustee has limited influence over managers' investment practices, but it encourages its managers to improve their practices where appropriate. Where the Scheme has bespoke (segregated) investment arrangements, there is an agreement in place with managers to align their investment strategy and decisions in relation to the Scheme's portfolios with the Trustee's investment policies.

The Trustee's view is that the fees paid to the investment managers, and the possibility of their mandate being terminated, ensure they are incentivised to provide a high-quality service that meets the stated objectives, guidelines and restrictions of the Scheme's various investment portfolios. While there is more scope to align managers' strategy and decisions where the Scheme has bespoke

(segregated) arrangements, for pooled funds it is more difficult for managers to fully align the (potentially conflicting) policies of all their pooled fund investors in relation to strategy, long-term performance of debt/equity issuers, engagement and portfolio turnover.

It is the Trustee's responsibility to ensure that the managers' investment approaches are consistent with its policies before any new appointment, and to monitor and to consider terminating any existing arrangements that appear to be investing contrary to those policies. The Trustee expects investment managers, where appropriate, to make decisions based on assessments of the longer term financial and non-financial performance of debt/equity issuers, and to engage with issuers to improve their performance. It assesses this when selecting and monitoring managers.

The Trustee evaluates investment manager performance over both shorter and longer-term periods as available. Except in closed-ended funds where the duration of the investment is determined by the fund's terms, the duration of a manager's appointment will depend on strategic considerations and the outlook for future performance. If a manager is not meeting its performance objectives, the Trustee will consider alternative arrangements.

The Trustee's policy is to evaluate each of its investment managers by considering performance, the role it plays in helping the Scheme meet its overall long-term objectives, taking account of risk, the need for diversification and liquidity. Each manager's remuneration, and the value for money it provides, is assessed in light of these considerations.

The Trustee recognises that portfolio turnover and associated transaction costs are a necessary part of investment management. As the impact of these costs is reflected in performance figures used in the Trustee's assessment of the investment managers, it does not explicitly monitor portfolio turnover. It expects its investment consultant to incorporate portfolio turnover and resulting transaction costs as appropriate in its advice on the ongoing suitability of the Scheme's investment mandates.

6. Realisation of investments

The Trustee cannot usually directly influence the managers' policies on liquidity where the Trustee holds assets in pooled funds. The investment managers have discretion over the timing of realisation of investments of the Scheme and in considerations relating to the liquidity of investments.

For the DB section, when appropriate, the Trustee, on the administrators' recommendation, decides on the amount of cash required for any outgoings and informs the investment managers of any liquidity requirements. The Trustee's preference 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., infrastructure).

For the DC section, the Trustee's policy is to invest in funds that offer daily dealing to enable members to readily realise and change their investments.

7. Financially material considerations and non-financial matters

The Trustee considers how ESG considerations (including but not limited to climate change) should be addressed in the selection, retention, and realisation of investments, given the time horizon of the Scheme and its members.

The Trustee influences the Scheme's approach to ESG and other financially material factors through the investment strategy and manager selection decisions. The Trustee expects all of its investment managers to take account of financially material factors (including climate change and other ESG factors) within the parameters of the mandates they are set. The Trustee seeks to appoint managers that have the skills and processes to do this, and review how the managers are taking account of these issues in practice.

The Trustee encourages its managers to improve their ESG practices, although acknowledge that it has limited influence where assets are held in pooled funds and that the parameters of some pooled funds may limit the scope for significant incorporation of ESG factors.

The Trustee does not consider matters that are purely non-financial in nature (i.e., matters relating to the ethical and other views of members and beneficiaries, rather than considerations of financial risk and return) in the selection, retention, and realisation of investments.

8. Voting and engagement

The Trustee recognises its responsibilities as owners 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 and is in the best interests of its members.

The Trustee seeks to appoint investment managers that have strong stewardship policies and processes, reflecting the principles of the UK Stewardship Code 2020 issued by the Financial Reporting Council.

The Trustee does not monitor or engage directly with issuers or other holders of debt or equity or with those who may have an interest in the issuer of such equity

or debt. The Trustee has delegated to the investment managers the exercise of rights attaching to investments, including voting rights, and engagement with relevant persons such as issuers of debt and equity, stakeholders and other investors about relevant matters such as performance, strategy, capital structure, management of actual or potential conflicts of interest, risks and ESG factors. The Trustee expects the managers to undertake voting and engagement in line with their stewardship policies, considering the long-term financial interests of investors.

The Trustee monitors managers' activities in relation to ESG factors, voting and engagement on a regular basis. It seeks to understand how they are implementing their stewardship policies in practice to check that their stewardship is effective and aligned with the Trustee's expectations.

The Trustee has selected some priority ESG themes to provide a focus for its monitoring of investment managers' voting and engagement activities. The Trustee reviews the themes regularly and updates them if appropriate. The Trustee communicates these stewardship priorities to its managers. If its monitoring identifies areas of concern, the Trustee will engage with the relevant manager to encourage improvements.