

Coopers (Great Yarmouth) Limited Retirement Benefits Scheme

Statement of Investment Principles

May 2026

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1. Introduction

1.1 What is the purpose of this Statement of Investment Principles (SIP)?

This SIP sets out the policy of the Trustee on matters governing decisions about the investments of the Coopers (Great Yarmouth) Limited Retirement Benefits Scheme (**the Scheme**).

The Scheme is a registered pension scheme with His Majesty's Revenue & Customs (**HMRC**) for the purpose of the Finance Act 2004. It is classed as a defined benefit (**DB**) pension scheme.

1.2 What is the legal and statutory background to the SIP?

The SIP is designed to meet the requirements of Section 35 of the Pensions Act 1995 (**the Act**) and all subsequent legislation, Regulations and guidance from The Pensions Regulator applying to UK pension schemes.

1.3 Who has had input to the SIP?

This SIP has been formulated after obtaining and considering written professional advice from Quantum Actuarial LLP trading as Quantum Advisory (**Quantum**), the Trustee's investment adviser, and consulting with Ensors Accountants LLP, liquidator, acting in their capacity as Coopers (Great Yarmouth) Limited (**the Sponsoring Employer**) as required by the Act and subsequently by the Regulations. Quantum has the knowledge and experience required under the Regulations to provide professional advice on the management of the Scheme's investments.

2. Investment policy, objectives and strategy

2.1 Investment policy

The Scheme's assets are held in trust by the Trustee. The investment powers of the Trustee are set out in the Scheme's Trust Deed.

The Trustee is aware of the need to invest assets in the best and sole interest of the members and that the powers of investment must be exercised in a manner which supports the security, quality, liquidity and financial viability of the Scheme as a whole.

The Trustee recognises that the assets of the Scheme must consist predominantly of investments admitted to trading on regulated markets and investment in assets which are not admitted to trading on such markets must, in any event, be kept to a prudent level.

2.2 Investment objective

The Trustee's primary objective is to provide pragmatic protection of Scheme benefits.

The Scheme is undergoing assessment by the Pension Protection Fund (**the PPF**). The Trustee's objective is to ensure that the investment strategy is aligned with the protection of the Scheme's funding position, whilst being mindful of the PPF assessment process. Specifically, these objectives include:

- To have sufficient funds to pay benefits as they fall due;
- To maintain financial resilience. This is defined as having a high level of confidence in the Scheme's ability to continue to pay members' benefits in full; and
- To maintain a low risk appetite, to ensure that the Scheme's funding level does not diminish.

2.3 The Scheme's investment strategy

In setting the strategy, the Trustee considered:

- the investment objectives;
- the Scheme's characteristics;
- the fees and charges associated with the investments;
- the fact that, for the foreseeable future, contributions receivable by the Scheme are not likely to exceed benefits payable;
- the risks and rewards of different asset classes and investment strategies;
- the expectation that, over the long-term, equities and other return-seeking assets are likely to produce higher returns than bonds, but at the risk of short-term volatility or liquidity constraints;
- the need for appropriate diversification between different asset classes;
- the financial strength and reputation of each investment manager;

- the financial strength of the investment managers' custodian; and
- the ability of the Sponsoring Employer's covenant to support the Scheme.

2.4 Risks and how they are managed

The Trustee's primary concern is to act in the financial interests of the Scheme's members. As such, the primary risk is the inability of the Scheme to meet member benefit payments as they fall due.

In order to achieve its objectives, the Trustee recognises the need to invest in assets that are likely to deliver its objectives (see 2.2 above). The Trustee has identified the following investment risks:

- the risk that investment returns in general will not achieve expectations;
- the risk that an investment fund or asset will not achieve its targets;
- the risk that the value of liabilities may increase due to changes in actual and expected inflation and interest rates;
- the risk of mismatch between the value and timing of the Scheme's income and outgoings;
- the risk of a shortfall in the liquid assets held by the Scheme relative to its immediate liabilities;
- the risk that the performance of any single investment within the Scheme assets may disproportionately affect the ability of the Scheme to meet its overall investment objectives;
- the risk of misappropriation, unauthorised use or mis-delivery of Scheme assets; and
- the risk that Environmental, Social and Governance (**ESG**) factors, including climate change, may adversely impact the value of the Scheme's assets if this is not given due consideration and/or misunderstood.

The Trustee recognises these different types of risk and seeks to minimise them as far as possible by the use of monitoring of investment performance; by a deliberate policy of diversification across specific investments; by taking into account the timing of future payments; and by periodically reviewing the appropriateness of the prevailing investment strategy against the Scheme's objectives.

2.5 The investment strategy

The investment strategy can use two key types of assets:

- **Matching assets:** these exhibit characteristics similar to those of the Scheme's liabilities. Typically, matching assets are low risk fixed income investments and the return from them is similar to the return on UK government bonds (referred to as the 'minimum risk' return).
- **Return-seeking assets:** these may be used to target a rate of return in excess of the minimum risk return. Typically, these are equities or a diversified pool of other non-matching assets.

Following the investment review in March 2026, a new investment strategy that minimises the expected level of funding volatility was implemented, in consultation with the PPF and the Sponsoring Employer. This focuses on the use of matching assets.

Details of the Scheme's strategic asset allocation can be found in the Appendix.

2.6 Fund managers, style and target returns

The Scheme can invest in pooled funds and/or direct holdings. The Trustee is satisfied that these are appropriate given the size and nature of the Scheme. Details of the investments and strategic allocation used by the Scheme can be found in the Appendix.

2.7 Portfolio re-balancing

The Scheme's assets will deviate from the strategic asset allocation over time due to market movements and disinvestments made to meet Scheme cashflow requirements. To ensure that the strategic allocation is managed pragmatically and cost-effectively, no automatic rebalancing policy is in place. The investment allocation is kept under periodic review to avoid the Scheme assets becoming overly misaligned with the target allocations and objectives.

Details of the Scheme's strategic allocation can be found in the Appendix.

2.8 Cash flow procedure

Where possible, Scheme cashflow requirements should be carried in a way that rebalances the Scheme's assets back in line with the strategic allocation.

In the first instance, monies will be disinvested from the cash/liquidity holdings, with any additional amounts being drawn down pro-rata across the rest of the portfolio.

3 Appointment of investment managers

3.1 How many investment managers are there?

The Scheme has one investment management relationship, which is with W1M Wealth Management Limited (**W1M**). This relationship is open ended and reviewed on a periodic basis.

3.2 What formal agreements are there with the investment manager?

The Trustee is responsible for selecting investment managers and funds which are appropriate to implement the investment strategy.

The Scheme has entered into an investment agreement with W1M, as the investment manager. W1M is responsible for managing the assets on behalf of the Scheme and managing the relationship with any underlying fund managers they may use in accessing funds. These responsibilities include transactions, reporting and governance.

The investment agreement (and appendices) sets out in detail the terms on which the portfolio is managed, including the need for suitable and appropriately diversified investments.

The Trustee keeps the appointment of the investment manager under review and will seek to replace the manager and/or funds which no longer remain appropriate to implement the Scheme's investment strategy.

3.3 What are the investment manager's responsibilities?

The investment manager is responsible for the day-to-day investment management of the investments and is responsible for appointing custodians, if required.

The investment manager is authorised under the Financial Services and Markets Act 2000 to conduct such activities.

3.4 Custodians and administrators

The Scheme's investments can be held through pooled investment vehicles and/or direct holdings of assets via W1M. Therefore, there is no need for the Trustee to formally appoint a custodian. W1M will appoint custodians for the safe custody of assets.

3.5 How does the Trustee review the performance of the investment manager?

The Trustee has appointed Quantum to assist in the selection and ongoing monitoring of the Scheme's investments.

The Trustee, with the assistance of Quantum at the Trustee's request, will monitor the performance of the investments against the stated objectives.

4. Other matters

4.1 What is the Trustee's policy on the realisation of investments?

The investment manager has discretion over the timing of realisation of investments within the pooled vehicles and direct holdings held by the Scheme and in considerations relating to the liquidity of investments.

Under the circumstances where the Scheme experiences negative cash flow, the Trustee and its advisers will decide on the amount of cash required for benefit payments and other outgoings and will inform the investment manager of any liquidity requirements.

In the absence of any strong conviction concerning the future movement of investment markets, assets will be disinvested first from the cash/liquidity allocation, and then pro-rata across the rest of the portfolio.

4.2 How are various parties who are involved in the investment of the Scheme's assets remunerated?

Quantum is remunerated on a fixed fee or time-cost fee basis, with budgets agreed in advance for ad hoc project work whenever possible.

The Scheme invests in both pooled funds and direct holdings. The Trustee, with the help of Quantum, sets the investment strategy for the Scheme and selects appropriate funds and holdings to implement the strategy.

The Trustee does not directly incentivise the investment manager to engage with the issuers of debt or equity to improve their performance. The Trustee does, however, expect the investment manager to participate in such activities as appropriate and necessary to meet the respective investment objectives. The funds utilised typically include an objective that is expected to result in a positive return over the medium-to-longer term and, as such, the investment manager engagements with the issuers of debt or equity are expected to be undertaken so as to target medium-to-long term value creation.

The investment manager, W1M, is remunerated on an ad valorem fee basis, which is calculated as a fixed percentage of the total value of the Scheme's funds they hold under management. This structure has been chosen to align W1M's interests with those of the Scheme.

4.3 Financially material considerations, non-financial matters and stewardship policies

4.3.1. Financially material considerations

The Trustee acknowledges the potential impact upon the Scheme's investments (both in terms of risk and return) arising from financially material matters. The Trustee defines these as including, but not limited to, ESG factors (including climate change).

With specific regard to ESG factors, the Trustee considers how these are integrated into the investment processes when: (i) appointing new investment funds; and (ii) reviewing existing investment funds. The Trustee has provided the appointed investment manager with full discretion concerning the evaluation of ESG factors. Representatives of the investment manager may attend Trustee meetings, at a frequency determined by the Trustee, to present on various matters including its ESG policies. The Trustee also periodically considers publicly available ESG related publications pertaining to the incumbent investment manager.

The Trustee acknowledges that some of the Scheme's investments are implemented on a passive basis and the majority of the Scheme's assets are either direct holdings of UK government issue, or in pooled funds. This restricts the ability of the Trustee to dictate the policy of the investment manager in relation to specific ESG considerations and limits the ability of the investment manager to take active decisions on whether to hold securities based on the consideration of ESG factors. The Trustee however expects the investment manager, where relevant, to utilise its position to engage with investee companies on these matters and is satisfied that an ESG assessment is embedded into the investment manager's research process and that such considerations are an integral part of determining which pooled investments are suitable for the Scheme.

The Trustee also considers ESG factors, as appropriate, when determining future investment strategy decisions. To date, the Trustee has not established any restrictions on the investment manager but may consider this in future.

4.3.2. Stewardship

The Trustee acknowledges the constraints that it faces in terms of influencing change due to the size and nature of the Scheme's investments. It does, however, acknowledge the need to be responsible stewards and exercise the rights associated with Scheme investments in a responsible manner.

The Trustee considers how stewardship factors are integrated into the investment processes when: (i) appointing new investment funds; and (ii) monitoring existing investment funds. The Trustee has provided the investment manager with full discretion concerning the stewardship of its investments.

The Trustee periodically reviews the investment manager's policies on the exercise of voting rights and monitors engagement practice and proxy voting activity via their annual reports.

4.3.3. Non-financial matters

The Trustee does not consider non-financial factors and does not employ a formal policy in relation to this when selecting, retaining and realising investments. However, where members have been forthcoming with their views, the Trustee may consider these when selecting, retaining and realising investments.

4.4 Direct Investments

The Act distinguishes between investments where the management is delegated to a fund manager with a written contract and those where a product is purchased directly.

The Trustee's policy is to review direct investments (if any) and to obtain written advice about them at regular intervals. When deciding whether to make any new direct investments or terminate any direct investments, the Trustee will obtain written advice from the Scheme's investment adviser. If the Trustee believes that an investment is no longer suitable for the Scheme, it will withdraw the assets from the arrangement deemed to be unsuitable and select a suitable alternative.

The written advice from the Scheme's investment adviser will consider the suitability of the investments, the need for diversification and the principles contained in this SIP. The adviser will have the knowledge and experience required under Section 36(6) of the Act to provide this advice.

4.5 Decision making

The Trustee is responsible for the investment of the Scheme's assets. The Trustee takes some decisions and delegates others.

When deciding which decisions to take, and which to delegate, the Trustee considers whether it has the appropriate training and expertise in order to make an informed decision.

The Trustee has established the following decision-making structure:

Trustee

- Sets structures and processes for carrying out its role.
- Agrees structure for implementing investment strategy.
- Selects and monitors planned asset allocation.
- Selects and monitors investment advisers and fund managers.
- Selects and monitors direct investments.
- Prepares and maintains the SIP.

Investment adviser

- Advises on the Scheme's assets, including implementation.
- Advises on this SIP.
- Provides required training.

Investment manager

- Operates within the written contracts and agreements.

- Select individual investments with regard to their suitability and diversification for the individual pooled vehicles.
- Ensure the suitability of the chosen benchmark for the respective investment vehicle.

4.6 Conflicts of interest

The Trustee considers any potential and actual conflicts of interest (subject to reasonable levels of materiality) at the start of each Trustee's meeting and documents these in minutes. The investment manager reports on conflicts of interest annually.

4.7 Capital structure of investee companies

The responsibility for monitoring the capital structure of investee companies (including any relevant developments) is delegated to the investment manager. The investment manager is expected to partake in a sufficient level of monitoring and action that is appropriate to the nature of the mandate.

5. Review

5.1 How often are investments reviewed?

Investment strategy reviews for the Scheme are undertaken periodically. Typically, a review of the Scheme will occur alongside triennial actuarial valuations; but more frequent reviews can occur in light of a material change of circumstances. Any change in investment strategy may necessitate a change in investment funds and investment holdings, regardless of the underlying performance.

Investment return experience and the performance of individual funds are reviewed with assistance from Quantum. Funds are reviewed against their agreed performance benchmarks and targets over both short-term and long-term periods to ensure they remain appropriate to implement the investment strategy.

5.2 How does the Trustee monitor portfolio turnover and costs?

The Trustee has delegated the selection of holdings to the appointed investment manager. The Trustee receives a report from W1M setting out portfolio turnover and the associated costs.

The Trustee has not set a specific portfolio turnover target for each investment fund and recognises that portfolio turnover and costs may vary with market conditions. W1M has ultimate responsibility for the underlying holdings within their funds, and they are expected to change these underlying holdings to the extent required to achieve their investment objectives.

5.3 How often is this SIP reviewed?

The Trustee will review this SIP periodically and without delay after any significant change in investment policy. Any change to this SIP will only be made after having obtained and considered the written advice of someone who the Trustee reasonably believes to be qualified by their ability in, and practical experience of, financial matters, and to have the appropriate knowledge and experience of the management of pension scheme investments, and consulting with the Sponsoring Employer.

Signature: Director

Date:

For and on behalf of Open Trustees Limited, sole trustee of the Coopers (Great Yarmouth) Limited Retirement Benefits Scheme

Appendix – Investments and asset allocation

Investment strategy

The following table shows the strategic asset allocation for the Scheme at the point of implementation. All investments are accessed through WIM Wealth Management Ltd. The Scheme's strategic asset allocation, level of liability hedge and performance is reviewed periodically, with assistance from the Scheme's investment adviser as required.

Asset class	Fund / investments	Allocation (%)
Cash/liquidity	Sterling Liquidity Fund	0 - 10.0
UK Government Bonds	Conventional Gilts	90.0 - 100
	Index - Linked Gilts	
Total		100.0

The actual allocation of assets is expected to drift from the central allocation over time, reflecting movements in market valuations and the payment of member benefits.