The Colorcon Limited Staff Benefits Plan

Statement of Investment Principles

July 2026

Preface

Scheme background
This Statement of Investment Principles (the 'SIP') details the principles governing investment decisions for the Colorcon Limited Staff Benefits Plan (the 'Plan').

The Plan operates for the exclusive purpose of providing retirement and death benefits to eligible participants and beneficiaries, and provides benefits calculated on a defined benefit (DB) basis. The Plan is closed to new entrants and future accrual. Following Plan closure the ex-active members retain a salary-link until retirement or leaving service, whichever occurs first.

Regulatory requirements and considerations
Under the Pensions Act 1995 (the 'Act') and subsequent legislation, principally the Occupational Pension Schemes (Investment) Regulations 2005 (the 'Investment Regulations'), the Trustees must secure that a written statement of the principles governing investment decisions is prepared and maintained for the Plan.

This SIP also reflects the requirements and recommendations within The Pensions Regulator's general code of practice, in respect of the DB assets and any additional voluntary contribution (AVC) arrangements. The Trustees are responsible for all aspects of the operation of the Plan including this SIP.

In agreeing their investment strategy, the Trustees have had regard to:

- The requirements of the Act concerning suitability and diversification of investments and the Trustees will consider those requirements on any review of this SIP or any change in the investment policy.
- The requirement of the Investment Regulations: in particular that assets held to cover the Plan's technical provisions must also be invested in a manner appropriate to the nature and duration of the expected future retirement benefits payable under the Plan.

Responsibilities and appointments
Only persons or organisations with the necessary skills, information and resources are actively involved in taking investment decisions affecting the Plan. The Trustees draw on the expertise of external persons and organisations including the investment consultant, investment managers and the Scheme Actuary. Full details are set out in this SIP.

Consultation
In accordance with the Act, the Trustees have obtained and considered written advice from Gallagher (Administration & Investment) Limited (the investment consultant) prior to the preparation (or revision) of this SIP and have consulted Colorcon Limited ('the Sponsoring Employer'). However, it should be noted that neither the Trustees (nor any investment manager to whom they have delegated

any discretion to make decisions about investments) shall require the consent of the Sponsoring Employer to exercise any investment power.

History and review

The Trustees will review this SIP at least every three years and without delay after each significant change in investment policy, taking note of any changes in the Plan's liabilities. Once agreed, and after consultation with the Sponsoring Employer, a copy of this SIP will be given to the Scheme Actuary, published online and will be made available to Plan members on request. This SIP replaces the version dated August 2025.

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Statement of Investment Principles

Investment governance structure

All investment decisions are taken by the Trustee Board as a whole. The Trustees believe that collective responsibility is the appropriate structure, given the size of the board, except for specific projects when an investment sub-committee may be set up. The Trustees will undertake training where appropriate to ensure they have the necessary expertise to take the decisions required and to evaluate critically the advice received.

All investment decisions relating to the Plan are under the control of the Trustee Board without constraint by the Sponsoring Employer. The Trustees will consult with the Sponsoring Employer when changing this SIP.

All day-to-day investment decisions are delegated to a properly qualified and authorised investment manager of pension scheme portfolios. An insurance contract has been exchanged with the investment manager and is reviewed from time-to-time to ensure that the manner in which the manager makes investments on behalf of the Trustees is suitable for the Plan, and appropriately diversified.

The Trustees take proper written advice before investing in any manner.

Investment strategy and objectives

The Plan's investment strategy has been agreed by the Trustees having taken advice from the investment consultant in relation to the suitability of investments and the need to diversify and takes due account of the Plan's liability profile along with the level of disclosed surplus or deficit.

The agreed investment strategy is based on an analysis of the Plan's liability profile, the required investment return and the returns expected from the various asset classes over the long-term. Long-term returns from equities are expected to exceed the returns from bonds and cash, although returns and capital values may demonstrate higher volatility. The Trustees are prepared to accept this higher volatility in order to aim to achieve the overall investment objectives.

The Trustees' primary objectives are:

- To maintain the stability of the Plan's funding level on a prudent calculation basis as far as practicable.
- To provide an appropriate level of liquidity to meet the Plan's cashflow requirements.

- To provide appropriate security for all beneficiaries.
- To achieve an appropriate balance between risk and return with regards to the cost of the Plan and the security of the benefits.

The Trustees have translated their objectives into a suitable strategic asset allocation benchmark for the Plan, details of which are included in the appendices of this SIP.

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 an investment manager authorised under the Act. Details are included in the appendices of this SIP.

The Trustees are responsible for reviewing both the Plan's asset allocation and investment strategy as part of each actuarial valuation in consultation with the Plan's investment consultant. The Trustees may also reconsider the asset allocation and the investment strategy outside the triennial valuation period where necessary.

The Trustees consider the Plan's current asset allocation to be consistent with the current financial position of the Plan. This assessment is in reference to the funding position on the Solvency basis as set out in the 30 June 2024 Actuarial Valuation Scheme Funding Report.

The Trustees' policy in relation to the kinds of investments to be held
The Trustees have full regard to their investment powers as set out in Clause 10 of the Trust Deed and Rules dated September 1996.

The Plan may invest in quoted and unquoted securities of UK and overseas markets including:

- Equities.
- Fixed interest and index-linked bonds.
- Cash.
- Other pooled investment vehicles considered appropriate for tax-exempt registered occupational pension schemes.

The Trustees have considered the attributes of the various asset classes (including derivative instruments), these attributes being:

- Security (or quality) of the investment.
- Yield (expected long-term return).
- Spread (or volatility) of returns.
- Term (or duration) of the investment.
- Exchange rate risk.
- Marketability/liquidity (i.e. the tradability on regulated markets).

- Taxation.

The Trustees consider all of the stated classes of investment to be suitable to the circumstances of the Plan. The Plan invests in pooled funds, other collective investment vehicles and cash. The Trustees have made the decision to invest the majority of assets in pooled funds because:

- The Plan is not large enough to justify direct investment on a cost-effective basis.
- Pooled funds allow the Trustees to invest in a wider range of assets, which serves to reduce risk.
- Pooled funds provide a more liquid form of investment than certain types of direct investment.

The Trustees' policy in relation to the balance between different kinds of investments

The appointed investment manager will hold a diversified mix of investments in line with their agreed benchmark and within their discretion to diverge from the benchmark. Within each major market the manager will maintain a diversified portfolio of securities. Full details are set out in Appendix 1 of this SIP.

The Trustees' policy in relation to the expected return on investments

The investment strategy is believed to be capable of exceeding, in the long run, the overall required rate of return assumed in the Scheme Actuary's published actuarial valuation report in order to maintain a fully funded status under the agreed assumptions on the Solvency basis.

The Trustees' policy in relation to the realisation of investments

In the event of an unexpected need to realise all or part of the assets of the portfolio, the Trustees require the investment manager to be able to realise the Plan's investments in a reasonable timescale by reference to the market conditions existing at the time the disposal is required and subject to the best interests of the Plan. The majority of the assets are not expected to take an undue time to liquidate.

The Trustees' policy in relation to financially material considerations

The Trustees believe that the potential impact of any financially material considerations that may affect the Plan's investments should be assessed over the period during which benefits are expected to be paid from the Plan and/or the period over which particular investments are expected to be held. The Trustees consider this as part of investment strategy setting, investment manager selection and ongoing monitoring of their investment manager, taking advice on these matters from the investment consultant.

In setting the Plan's investment strategy, the Trustees' primary concern is to act in the best financial interests of the Plan and its beneficiaries, seeking to meet the

Trustees' expected return on investments consistent with a prudent and appropriate level of risk.

The Trustees expect the investment manager, 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.

As the Plan invests entirely through pooled funds, the Trustees recognise that, to some extent, the approach being taken in this area is delegated to the investment manager; however, by considering the managers' approach prior to appointment, and on an ongoing basis thereafter, the Trustees believe they are able to ensure that it is broadly aligned to their own preferences, and believes that they will have the opportunity to raise any concerns over divergencies.

The Trustees review, from time to time, the investment manager's policies in respect of financially material considerations.

The Trustees have also agreed a separately documented climate change risk process to assess the risks and opportunities associated with climate change as part of meeting The Pensions Regulator's expectations under the General Code of Practice.

The Trustees' policy in relation to the extent to which non-financial matters are taken into account

The Trustees' objective is that the financial interests of the Plan members is their first priority when choosing investments. The Trustees have decided not to take members' preferences into account when considering these objectives.

Risk capacity and risk appetite

The Trustees, after seeking appropriate investment advice, have selected an investment strategy for the Plan (see Appendix 1).

Subject to the respective benchmarks and guidelines (shown in Appendix 1) the investment manager is given full discretion over the choice of stocks and is expected to maintain diversified portfolios.

The Trustees are satisfied that the investments selected are consistent with their investment objectives, particularly in relation to diversification, risk, expected return and liquidity.

The Trustees' policy in relation to risks

The Trustees consider the main risk to be that of the assets being insufficient to meet the Plan's liabilities as they fall due. The Trustees have assessed the likelihood of undesirable financial outcomes arising in the future.

Investment policies are set with the aim of having sufficient and appropriate assets to cover the Plan's Technical Provisions, and to avoid undue volatility in the Plan's funding level on a solvency basis.

In determining their investment strategy, the Trustees received advice from the investment consultant on the level of investment risk relative to the Plan's liability profile. Taking this into account, along with the expected returns underlying the most recent actuarial valuation, the strategy outlined in Appendix 1 of this SIP has been adopted.

Although the Trustees acknowledge that the main risk is that the Plan will have insufficient assets to meet its liabilities, the Trustees recognise other contributory risks, including the following. Namely the risk:

- Associated with the differences in the sensitivity of asset and liability values to changes in financial and demographic factors.
- Of the Plan having insufficient liquid assets to meet its immediate liabilities.
- Of the investment manager failing to achieve the required rate of return.
- Due to the lack of diversification of investments.
- Of failure of the Plan's Sponsoring Employer to meet its obligations.

The Trustees manage and measure these risks on a regular basis via actuarial and investment reviews, and in the setting of investment objectives and strategy.

The Trustees undertake monitoring of the investment manager's performance against their targets and objectives on a regular basis.

The majority of the funds in which the Trustees invest have a stated performance objective against which investment performance will be measured. These are shown in Appendix 1. Within each asset class, the investment manager is expected to maintain a portfolio of securities (or funds), which ensures that the risk being accepted in each market is broadly diversified.

The divergence of the actual distribution of the investments from the benchmark weighting for each fund will be monitored by the Plan's investment manager. The Plan's asset allocation will be discussed periodically with the investment consultant.

Stewardship in relation to the Plan's assets

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 can promote an investment's long-term success through monitoring, engagement and/or voting, either directly or through their investment managers.

The Trustees' policy in relation to engagement and monitoring (including peer to peer engagement)
The Trustees' policy is to delegate responsibility for engaging and monitoring investee companies to the investment manager and they expect the investment manager to use their discretion to maximise financial returns for members and others over the long term.

The Trustees recognise that the investment manager's ability to influence the companies in which they invest will depend on the nature of the investment.

The Trustees acknowledge that the concept of stewardship may be less applicable to some of their assets, particularly for short-term money market instruments, corporate bonds as well as fixed and index-linked gilts.

The Trustees reviewed the investment manager prior to appointment and monitors them on an ongoing basis through the regular review of the investment manager's voting and engagement policies.

As all of the investments are held in pooled vehicles, the Trustees do not envisage being directly involved with peer to peer engagement in investee companies.

The Trustees' policy in relation to voting rights
The Trustees' policy is to delegate responsibility for the exercising of rights (including voting rights) attached to investments to the investment manager and to encourage the manager to exercise those rights. The investment manager is expected to provide regular reports for the Trustees detailing their voting activity.

Investment management monitoring

The Trustees will assess the performance, processes and cost effectiveness of the investment manager by means of regular, but not less than annual, reviews of the results and other information, in consultation with the investment consultant.

All investment decisions, and the overall performance of the investment manager, are monitored by the Trustees with the assistance of the investment consultant.

The investment manager will provide the Trustees with quarterly statements of the assets held along with a quarterly performance report. The investment manager will also report orally on request to the Trustees.

The investment manager will inform the Trustees of any changes in the internal performance objective and guidelines of any pooled funds used by the Plan as and when they occur.

The Trustees will assess the quality of the performance and processes of the investment manager by means of a review at least once every three years in consultation with the investment consultant.

The Trustees receive an independent investment performance monitoring report from the investment consultant on a quarterly basis.

Appropriate written advice will be taken from the investment consultant before the review, appointment or removal of the investment manager.

The Trustees' policy in relation to their investment managers
In detailing below the policies on the investment manager arrangements, the over-riding approach of the Trustees is to select investment managers that meet the primary objectives of the Trustees. As part of the selection process and the ongoing review of the investment manager, the Trustees consider how well the investment manager meets the Trustees' policies and provides value for money over a suitable timeframe.

- **How the arrangement incentivises the investment manager to align its investment strategy and decisions with the Trustees' policies**

  The Trustees have delegated the day to day management of the Plan's assets to an investment manager. The Plan's assets are invested in pooled funds which have their own policies and objectives and charge a fee, agreed with the investment manager, for their services. Such fees incentivise the investment manager to adhere to their stated policies and objectives.

- **How the arrangement incentivises the investment manager to engage and take into account financial and non-financial matters over the medium to long-term**

  The Trustees, in conjunction with their investment consultant, appoint their investment manager to meet specific Plan policies. They expect the investment manager to make decisions based on assessments about the financial performance of underlying investments, and that they engage with issuers of debt or equity to improve their performance (and thereby the Plan's performance) over an appropriate time horizon.

  The Trustees also expect their investment manager to take non-financial matters into account as long as the decision does not involve a risk of significant detriment to members' financial interests.

- **How the method (and time horizon) of the evaluation of the investment manager's performance and the remuneration for asset management services are in line with the Trustees' investment policies**

  The Trustees expect their investment manager to invest the assets within their portfolio in a manner that is consistent with the guidelines and constraints set out in their appointment documentation. The Trustees review the investment manager periodically. These reviews incorporate benchmarking of performance and fees.

Reviews of performance focus on longer-term performance (to the extent that is relevant), e.g. looking at five years of performance.

If the Trustees determine that an investment manager is no longer managing the assets in line with the Trustees' policies they will make their concerns known to the investment manager and may ultimately disinvest.

The Trustees pay their investment manager a management fee which is a fixed percentage of assets under management.

Prior to agreeing a fee structure, the Trustees, in conjunction with their investment consultant, consider the appropriateness of this structure, both in terms of the fee level compared to that of other similar products and in terms of the degree to which it will incentivise the investment manager.

- **How the Trustees monitor portfolio turnover costs incurred by the investment manager, and how they define and monitor targeted portfolio turnover or turnover range**

  The Trustees, in conjunction with their investment consultant, have processes in place to review investment turnover costs incurred by the Plan on an annual basis. The Trustees receive a report which includes the turnover costs incurred by the investment manager used by the Plan.

  The Trustees expect turnover costs of the investment manager to be in line with their peers, taking into account the style adopted by the investment manager, the asset classes invested in and prevailing market conditions.

  The Trustees do not explicitly monitor turnover, set target turnover or turnover ranges. The Trustees believe that the investment manager should follow their stated approach with a focus on risk and net return, rather than on turnover. In addition, the individual mandates are unique and bespoke in nature and there is the potential for markets to change significantly over a short period of time.

- **The duration of arrangements with investment managers**

  The Trustees do not in general enter into fixed long-term agreements with their investment managers and instead retain the ability to change investment manager should the performance and processes of the investment manager deviate from the Trustees' policies. However, the Trustees expect their manager appointments to have a relatively long duration, subject to the manager adhering to its stated policies, and the continued positive assessment of its ability to meet its performance objective.

Employer-related investments

The Trustees will not make direct investments in the Sponsoring Employer's own securities. The amount of the Sponsoring Employer's securities owned by the pooled investment vehicles invested in is monitored. The Trustees have delegated the responsibility for the exercising of any voting rights attached to any Sponsoring Employer investment held to the investment managers.

Additional voluntary contributions (AVCs)

The Trustees have full discretion as to the appropriate investment vehicles made available to members of the Plan for their voluntary contributions. Only investment vehicles normally considered suitable for voluntary contributions will be considered by the Trustees, having taken appropriate written advice from properly qualified and authorised advisers.

The Trustees will monitor the performance of the AVC providers periodically. Members are directed to seek independent financial advice when considering their AVC arrangements.

The AVC funds used by Plan members are set out below:

AVC Provider	Investment Options
Prudential Plc	With Profits Cash Accumulation Fund
	Discretionary Fund
	International Equity Fund

This is a legacy arrangement that no longer accepts contributions.

Appointments and responsibilities

This section sets out the key appointments and responsibilities with respect to the investment aspects of the Plan.

A full list of the Plan's advisers is provided at the front of the Plan's Annual Report and Financial Statements. However, at the time of writing this SIP:

- The investment consultants are Gallagher (Administration & Investment) Limited.
- The investment manager is detailed in the Appendices to this SIP.
- The Scheme Actuary is Mark van den Berghen of Gallagher Benefit Services Management Company Limited.

Trustees
The Trustees' primary responsibilities include:

- The preparation of this SIP, reviewing its contents and modifying it if deemed appropriate, in consultation with the Sponsoring Employer and the investment consultant, at least every three years. The SIP will also be reviewed following a significant change to investment strategy and/or the investment managers.
- Appointing investment consultants and investment managers as necessary for the good stewardship of the Plan's assets.
- Setting objectives for the appointed investment consultant (reviewing these at least every three years, and following any significant change to investment strategy), as well as reviewing the investment consultant's performance against these objectives at least annually.
- Reviewing the investment strategy as part of each triennial actuarial valuation, and/or asset liability modelling exercise, and/or significant changes to the Plan's liabilities, taking advice from the investment consultant.
- Reviewing the stewardship / voting policies of the investment manager and undertaking the ongoing monitoring and engagement with their investment managers as appropriate.
- Assessing the processes and the performance of the investment manager by means of regular, but not less than annual, reviews of information obtained (including investment performance).
- Monitoring compliance of the investment arrangements with this SIP and with the relevant sections of the Act, the Investment Regulations and any regulatory guidance on a regular basis.
- Monitoring risk and the way in which the investment manager has cast votes on behalf of the Trustees in respect of the Plan's equity holdings.

Investment consultant

The main responsibilities of the investment consultant include:

- Obtaining a copy of the Trustees' investment consultant objectives prior to undertaking work to ensure they understand the Trustees' requirements.
- Assisting the Trustees in the preparation and periodic review of this SIP in consultation with the Sponsoring Employer.
- Undertaking project work including the development and review of investment strategy, investment performance and manager structure as required by the Trustees.
- Advising the Trustees on the selection and review of the investment manager.
- Providing training or education on any investment related matter as and when the Trustees see fit.
- Monitoring and advising upon where contributions should be invested or disinvested on a periodic basis.

Investment manager

The investment manager's main responsibilities include:

- Investing the assets within their portfolio in a manner that is consistent with the guidelines and constraints set out in their appointment documentation.
- Ensuring that the investment of the assets within their portfolio is compliant with prevailing legislation.
- Providing the Trustees with quarterly reports and a review of the investment performance of their portfolio.
- Meetings with the Trustees as and when required.
- Informing the Trustees of any changes in the fee structure, internal performance objectives and guidelines of any pooled fund within their portfolio as and when they occur.
- Considering financially material risks affecting investments within their portfolio.
- Exercising voting rights on shareholdings within their portfolio in accordance with their general policy.

Scheme Actuary

The Scheme Actuary's main responsibilities in respect of investment policy include:

- Commenting on the suitability of the Plan's investment strategy given the financial characteristics of the Plan.
- Performing the triennial (or more frequently as required) actuarial valuation and advising on the Plan's funding level and therefore the appropriate level of contributions in order to aid the Trustees in balancing short-term and long-term investment objectives.

Compliance

The Plan’s SIP is available online and to members on request.

A copy of the Plan’s current SIP is also supplied to the Sponsoring Employer, the Plan’s auditors and the Scheme Actuary.

This SIP, taken as a whole with the Appendices, supersedes all others and was approved by the Trustees.

Full name	
Signature	Kevin Hughes
Position	Trustee
For and on behalf of	Board of Trustees
Date	7th July 2026

Full name	
Signature	Steve Batchelor
Position	Trustee
For and on behalf of	Board of Trustees
Date	7th July 2026

Appendix 1 – Investment Strategy and objectives

Plan's investment strategy
In 2026 the Trustees reviewed the Plan's risk reducing assets and agreed to rebalance the hedging portfolio to target 100% hedge ratios with respect to changes in both interest rates and inflation expectations relative to the solvency liabilities. The Plan's asset allocation at the time of implementation in May 2026 is tabulated below. The allocation set out below is expected to evolve over time as income is paid out, hedging assets mature to meet benefit payments, and in order to maintain the target hedge ratios:

Asset type	Investment manager	Investment style	Allocation (%)
Global Equities	L&G	Passive	5.6
Growth Assets			**5.6**
Buy and Maintain Credit	L&G	Active	11.4
UK Fixed-Interest Gilts	L&G	Passive	24.0
UK Index-Linked Gilts	L&G	Passive	48.9
Cash	L&G	Passive	10.0
Risk Reducing Assets			**94.4**
Total			**100.0**

Note: Allocation shown excludes assets held in the Trustees' Bank Account.

Benchmark and performance objectives

Benchmark indices and relative performance objectives for each of the funds in which the Plan's assets are invested are outlined below. All performance targets are gross of fees and relate to rolling three-year periods unless otherwise stated.

Manager	Fund	Benchmark index	Objective
L&G	All World Equity Index Fund	FTSE All-World Index	To track the benchmark within +/- 0.50% p.a. for 2 out of 3 years
	Maturing Buy and Maintain Credit Funds	N/A	To provide diversified credit exposure with the bonds maturing over relevant time periods.
	Fixed-Interest & Index-Linked Gilts	Benchmark bespoke to the term of the pooled fund	To track the benchmark within +/- 0.25% p.a. for 2 out of 3 years
	Sterling Liquidity Fund	SONIA	To provide diversified exposure and a competitive return in relation to the benchmark.

Appendix 2 – Fees

Investment manager fees

Manager	Fund	Investment style	Management fee
L&G	All World Equity Index Fund	Passive	0.200% per annum of the first £5m, plus 0.175% per annum for the next £10m, (reduced fees apply thereafter)
	Maturing Buy and Maintain Credit Funds	Active	0.150% per annum
	Fixed-Interest & Index-Linked Gilts	Passive	0.100% per annum of the first £5 million, plus 0.075% per annum of the next £5 million, (reduced fees apply thereafter)
	Sterling Liquidity Fund	Active	0.125% per annum of the first £5 million, plus 0.100% per annum of the next £5 million, (reduced fees apply thereafter

Investment consultancy fees
The investment consultant provides agreed services on a fixed fee basis, with additional projects provided on a time cost basis subject to agreement in advance.

The basis of remuneration is kept under review.