

1. Background

This Statement of Investment Principles (hereafter referred to as the “Statement”) sets down the principles governing decisions about investments for the PGIM UK Retirement Savings Plan (“the Plan”) to meet the requirements of the following legislation:

- The Pensions Act 1995, as amended by the Pensions Act 2004; and
- The Occupational Pension Schemes (Investment) Regulations 2005, as amended by the Occupational Pension Schemes (Charges and Governance) Regulations 2015
- The Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019
- and subsequent legislation.

The Trustees believe their scheme governance, investment policies and their implementation are in keeping with best practice. This includes, but is not limited to, the Pension Regulator’s DC Code of Practice no. 13 (Governance and Administration of Occupational Defined Contribution Trust-Based Pension Schemes) and regulatory guidance.

In preparing this Statement the Trustees have consulted PGIM European Services Limited as the Principal Employer of the Plan and obtained and considered written professional advice from their Investment Consultant.

Our investment responsibilities are governed by the Plan’s Trust Deed; a copy of the relevant clause, of which this Statement takes full regard, is shown in **Appendix A**. We will, at the minimum, review this Statement every three years to ensure that it remains accurate. The Statement will be amended more frequently should any changes be made to the Plan’s investment arrangements.

The Plan has both a Defined Benefit (“DB”) section and a Defined Contribution (“DC”) section. This Statement covers only the DC section, and the Trustees have prepared a separate Statement of Investment Principles for the DB section.

2. Responsible Investment - ESG, Stewardship, and Climate Change

The Trustees believe that environmental, social, and corporate 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.

The investment managers of the DC section investment funds have been delegated through the platform operator contract with Scottish Widows Limited to act accordingly, and the Trustees accept that the assets are subject to the investment managers’ own policies on ESG matters including climate change considerations.

Similarly, the Plan’s voting rights are exercised by its investment managers in accordance with their own corporate governance policies, and taking account of current best practice including the UK Corporate Governance Code and the UK Stewardship Code. Equity managers who are FCA registered are expected to report on their adherence to the UK Stewardship Code on an annual basis.

The explicit equity allocation within the Plan's default investment strategy reflects an ESG-focused blended fund, the World ESG Equity Tracker (50% GBP Hedged), comprising 50% of the BlackRock World ESG Equity Tracker Fund and 50% of the BlackRock World ESG Equity Tracker Fund (GBP Hedged). This aims to track the MSCI World ESG Focus Low Carbon Screened Index 50% Hedged. This fund is also available as a self-select option for members.

The Trustees have also made available to members a specialist ethical equity fund, the L&G Ethical Global Equity Index Fund, which aims to track the FTSE4Good Global Equity Index. This fund is available as a self-select option.

Member views are not taken into account in the selection, retention and realisation of investments. However, if the Trustees were formally approached by members expressing such views, these would be considered on their merits.

The Trustees have determined the following ESG themes as the basis for the Plan's "most significant votes" in respect of the investment manager engagement activities: climate change (for example, votes relating to low-carbon transition plans consistent with the Paris Agreement goals) and good corporate governance (in particular board diversity and independence).

3. Implementation and Engagement Policy

3.1. Aligning Manager Investments Strategy and Decisions with Trustees' policies

Investment managers are appointed based on their capabilities and, therefore, their perceived likelihood of achieving the expected return and risk characteristics required for the asset class being selected. These characteristics will differ for each asset class so appointing a single manager is unlikely to be the most appropriate approach.

The Trustees will seek guidance from the Investment Consultant, where appropriate, for their forward-looking assessment of a manager's ability to outperform over a full market cycle. This view will be based on the Investment Consultant's assessment of the manager's idea generation, portfolio construction, implementation and business management, in relation to the particular investment fund that the Plan offers to its members. The Investment Consultant's manager research ratings, including their ESG ratings, assist with due diligence and are used in decisions around selection, retention and realisation of manager appointments. The manager ratings are incorporated into the Trustees' monitoring reports and the Trustees consider this on a quarterly basis.

The Trustees will review an appointment if the investment objective for a manager's fund changes to ensure it remains appropriate and consistent with the Trustees' wider investment objectives.

The Trustees invest in pooled investment vehicles so they accept that they have no ability to specify the risk profile and return targets of the manager, but appropriate mandates can be selected to align with the overall investment strategy.

The Trustees access funds via a platform, the chosen investment managers continued appointment is based on their success in delivering the mandate for which they have been appointed to manage. If the Trustees are dissatisfied, then they will look to review

the appointment. The process for assessing satisfaction with the managers is set out in Section 3.2.

3.2. Evaluating Investment Manager Performance

The Trustees receive investment manager performance reports on a quarterly basis, which present performance information over 3 months, 1 year, 3 years and 5 years (where available). The Trustees review the absolute performance and relative performance against a suitable index used as the benchmark, and against the manager's stated target performance objective for both active and passive managers (over the relevant time period) on a net of fees basis.

The Trustees focus on long term performance but, as noted above, may review a manager's appointment if:

- There are sustained periods of underperformance, adopting a trigger based review;
- system in the performance reporting;
- There is a change in the portfolio manager or the team responsible;
- There is a change in the underlying objectives or process of the investment manager;
- There is a significant change to the Investment Consultant's rating of the manager.

3.3. Portfolio Turnover Costs

The Trustees monitor portfolio turnover costs, which are incorporated in the annual costs and charges, on an annual basis as part of its annual value for members assessment.

3.4. Manager Turnover

The Trustees are long-term investors and are not looking to change the investment arrangements on a frequent basis. The Trustees will therefore retain an investment manager unless:

- There is a strategic change to the overall strategy that no longer requires exposure to that asset class or manager;
- The basis on which the manager was appointed changes materially (e.g. manager fees or investment process);
- The manager appointed has been reviewed in line with Section 3.2 and the Trustees have decided to terminate the mandate.

4. Investment Objectives and Risk

We believe that members have differing investment needs and that these may change during the course of members' working lifetimes. We also recognise that members have different attitudes to risk and we believe that ideally members should make their own investment decisions based on their individual circumstances. We regard our duty as making available a range of investment funds that enable members to tailor a strategy to their own needs.

For members who do not wish to make their own investment choices, we make available a Default Investment Option that is described in Section 5. However, we recognise that this option cannot meet every individual member's needs.

4.1. Investment Objectives

The Trustees' main aim is to make sure that the obligations to the members of the Plan are met, by adopting the following objectives:

- a. To ensure there is a sufficient number of appropriate investment options available to allow the member to plan for retirement.
- b. To maximise the value of members' assets at retirement at an acceptable level of risk.
- c. To maintain the purchasing power of members' savings.
- d. To provide some protection for members' accumulated assets in the years approaching retirement against sudden volatility in the capital value and fluctuations in the cost of providing benefits.

The Trustees aim to meet these objectives by the following:

- a. Offering members four 'Lifestyle' approaches to investment strategy (one of which is also the Default Investment Option) and ensuring that the other investment options also allow members to plan for retirement.
- b. Making available a range of pooled investment funds which serve to meet the varying investment needs and risk tolerances of Plan members.
- c. Providing general guidance as to the purpose of each investment option.
- d. Encouraging members to seek financial advice from a FCA regulated financial adviser in determining the most suitable option.

We will regularly review the suitability of the options provided and from time to time will change manager or introduce additional investment portfolios as appropriate.

4.2. Risk

The Trustees have considered investment risk from a number of perspectives as follows:

Risk	How it is managed	How it is measured
<p>Inflation Risk</p> <p>The real value (i.e. post inflation) of members' savings decreases.</p>	<p>The Trustees provide members with a range of funds, across various asset classes, with the majority expected to keep pace with or return above inflation.</p> <p>Members are able to set their own investment allocations, in line with their risk tolerances.</p>	<p>Consider the real returns (i.e. return above inflation) of the funds, with positive values indicating returns have kept pace with inflation</p>

Risk	How it is managed	How it is measured
<p>Pension Conversion Risk</p> <p>Members' investments do not match how they would like to use their savings pots in retirement.</p>	<p>The Trustees make available three lifestyling strategies for DC members, each targeting either cash, drawdown or annuity.</p> <p>Lifestyle strategies automatically switch member savings as they approach retirement into investments that are expected to be less volatile relative to how they wish to access their pension savings. These lifestyling strategies increase the proportion of assets that more closely match the chosen retirement destination as members approach retirement. This aims to reduce the risk of a substantial fall in the purchasing power of their accumulated savings near retirement.</p>	<p>Consider the returns of the funds used within the switching phase of the lifestyle strategy both in absolute terms as well as relative to inflation, cash or annuity prices (depending on their selected retirement destination).</p>
<p>Market Risk</p> <p>The value of securities, including equities and interest bearing assets, can go down as well as up.</p>	<p>The Trustees provide members with a range of funds, across various asset classes. Members are able to set their own investment strategy in line with their risk tolerances.</p> <p>For the funds managed on an active basis, many of these market risks are the responsibility of the investment manager to the extent that the funds objectives and constraints allow.</p>	<p>Monitor the performance of external investment funds on a quarterly basis.</p>

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Risk	How it is managed	How it is measured
<p>Currency Risk</p> <p>The value of an investment in the member's base currency may change as a result of fluctuating foreign exchange rates.</p>	<p>The Trustees provide diversified investment options that invest in local as well as overseas markets and currencies. There is also a currency hedged option.</p> <p>Delegated to investment managers.</p> <p>Members are able to set their own investment allocations, in line with their risk tolerances.</p>	<p>Monitor the performance of external investment funds on a quarterly basis.</p> <p>Considers the movements in foreign currencies relative to pound sterling.</p>
<p>Operational Risk</p> <p>A lack of robust internal processes, people and systems.</p>	<p>The Trustees review and monitor the investment options on a regular basis.</p>	<p>Consider the ratings of investment strategies from the Investment Consultant and monitor these on an annual basis.</p>
<p>Liquidity Risk</p> <p>Assets may not be readily marketable when required.</p>	<p>The Trustees access daily dealt and daily priced pooled funds through a unit-linked insurance contract from Scottish Widows.</p>	<p>The pricing and dealing terms of the funds underlying the unit-linked insurance contract.</p>
<p>Valuation Risk</p> <p>The value of an illiquid asset is based on a valuer's opinion, realised value upon sale may differ from this valuation.</p>	<p>Some diversified growth fund managers and property funds may hold illiquid assets. In such cases, the management of valuation risk is delegated to the external investment manager.</p> <p>The majority of investment managers invest solely in liquid quoted assets.</p>	<p>The Trustees monitor performance of funds on a quarterly basis, and where relevant delegates the monitoring of valuation risk to the Investment Consultant.</p>

Risk	How it is managed	How it is measured
<p>Environmental, Social and Governance Risk</p> <p>The risk that environmental, social or corporate governance concerns, including climate change, have a financially material impact on the return of the Plan’s assets.</p>	<p>Delegated to external investment managers with Trustee oversight.</p> <p>The Trustees have made available an ESG-focused global equity fund for members who would like to choose to invest in this manner. This fund is also used within the Diversified Fund within the default strategy.</p> <p>The Trustees’ policy on Responsible Investment is set out in Section 2 of this Statement.</p>	<p>The day-to-day management of ESG related risks is the responsibility of the investment managers. However, the Trustees monitor how ESG is integrated within investment processes.</p>
<p>Manager Skill / Alpha Risk</p> <p>Returns from active investment management may not meet expectations, leading to lower than expected returns for members.</p>	<p>The Trustees make available a number of actively managed funds to members where they deem appropriate.</p>	<p>The Trustees consider the ratings of investment strategies from its Investment Consultant during the selection process.</p> <p>Trustees monitor performance and rating of funds on an annual basis relative to the fund’s benchmark and stated targets/objective.</p>

The Trustees believe that the investment options outlined in Sections 4 and 5 below are appropriate for meeting the risks outlined above.

In considering the range of funds to offer to members, the Trustees acknowledge that the investment time horizon of each individual member is different and will be dependent on their current age and when they expect to retire. In selecting the lifestyle options, the Trustees have taken the proximity to the target retirement date into account and the associated financially material risks over the strategies’ full time horizon.

The Trustees pay close regard to the risks which may arise from the lack of diversification of investments. The Trustees believe that the choice of funds in place provides an adequately diversified distribution of assets.

5. Range of Funds

The Trustees believe that the investment options outlined in this section are appropriate for meeting the investment objectives outlined in Section 3. In particular, for members who do not wish to take an active role in the investment decisions, the Trustees offer a **Default Investment Option** (the “*Diversified Lifestyle – Targeting*”

Drawdown) with lifestyling which aims to de-risk members as they approach retirement, by targeting an asset allocation at retirement aligned with members taking 25% tax free cash and using the remaining 75% of their assets for flexible drawdown. The Trustees note that drawdown is not available through the Plan directly, but that it is made available on Scottish Widows' administration and investment platform or through transferring assets to another provider.

The Trustees have also made available two alternative lifestyle strategies; one designed for members looking to purchase an annuity at retirement; the other designed for members who wish to take all their DC section benefits as a cash sum at retirement.

Bearing in mind the level of investment knowledge of a typical member and the desire to keep the available fund range simple and understandable (while providing appropriate choice) the Trustees have decided to make a range of additional funds available to members, offering both passively and actively managed funds:

Equities

BlackRock World ESG Equity Tracker (50% GBP Hedged) (Passive)
BlackRock Aquila 30:70 Global Equity – Currency Hedged (Passive)
BlackRock Aquila UK Equity (Passive)
BlackRock Aquila World (ex UK) Equity (Passive)
BlackRock Aquila Emerging Market Equity (Passive)
L&G Global Equity Fixed Weights (60:40) (Passive)

Diversified Growth Funds

Baillie Gifford Diversified Growth Fund (Active)
Insight Broad Opportunities Fund (Active)
Ruffer Diversified Return Fund (Active)

Blended Equities/Diversified Growth

Diversified Fund (Passive/Active)

Bonds

BlackRock Aquila Over 5 Year Index Linked Gilts (Passive)
L&G Future World Annuity Aware (Passive)
M&G UK Corporate Bond (Active)

Cash

BlackRock Sterling Liquidity (Active)

Specialist – Drawdown fund

Mercer Diversified Retirement (Active)

Specialist – Shariah compliant equity

HSBC Islamic Global Equity Index (Passive)

Specialist – Ethical equity

L&G Ethical Global Equity (Passive)

Lifestyling

The *Diversified Lifestyle – Targeting Drawdown* option initially invests in the blended Diversified Fund, which comprises 50% Equities (22.5% of the BlackRock World ESG Equity Tracker Fund, 22.5% of the BlackRock World ESG Equity Tracker Fund (GBP Hedged) and 5% of the BlackRock Emerging Markets Equity Fund) and 50% Diversified Growth Funds (20% in the Insight Broad Opportunities Fund and 30% in the Ruffer Diversified Return Fund). Once a member is six years from retirement, their assets will begin de-risking gradually into Mercer Diversified Retirement Fund and BlackRock Sterling Liquidity funds, until the final asset allocation of 75% Mercer Diversified Retirement Fund and 25% BlackRock Sterling Liquidity Fund is reached when the member is one year from retirement.

The *Diversified Lifestyle – Targeting Annuity Purchase* option initially invests in the blended Diversified Fund. Once a member is six years from retirement, their assets will begin de-risking gradually into L&G Future World Annuity Aware and BlackRock Sterling Liquidity funds, until the final asset allocation of 75% L&G Future World Annuity Aware Fund and 25% BlackRock Sterling Liquidity Fund is reached when the member is one year from retirement.

The *Diversified Lifestyle – Targeting Cash* option initially invests in the blended Diversified Fund. Once a member is six years from retirement, their assets will begin gradually de-risking into the BlackRock Sterling Liquidity Fund (via the L&G Future World Annuity Aware Fund), until the final asset allocation of 100% BlackRock Sterling Liquidity Fund is reached when the member is one year from retirement.

The *Legacy Global Equity Lifestyle* option initially invests in the L&G Global Equity (60:40) Index Fund. Once a member is six years from retirement, their assets will begin de-risking gradually into L&G Future World Annuity Aware and BlackRock Sterling Liquidity funds, until the final asset allocation of 75% L&G Future World Annuity Aware Fund and 25% BlackRock Sterling Liquidity Fund is reached when the member is one year from retirement. The Legacy Global Equity Lifestyle option was closed from September 2023 for members more than five years from their selected retirement age, with assets transferred to the default strategy.

6. Default Investment Option

Typically, a proportion of members will actively choose the Default Investment Option because they feel it is most appropriate for them. However, for the vast majority of DC scheme members who do not make an active investment decision are invested automatically in the Default Investment Option.

The Trustees review the strategy used for the Default Investment Option at least every three years and in response to any significant change in investment policy or the demographic profile of relevant members. The performance of the Default Investment Option is monitored quarterly, with the Trustees reviewing reports from the provider at Trustee meetings to ensure the net of fees returns are consistent with the aims of the strategy.

6.1. The aims of the Default Investment Option (the Diversified Lifestyle - Targeting Drawdown strategy)

Based on the Trustees' understanding of members' circumstances, and having regard to likely future developments, the Trustees believe that an investment strategy that targets income drawdown at retirement is likely to reflect a typical member's choice of how they take benefits at retirement.

The default *Diversified Lifestyle – Targeting Drawdown* strategy manages investment and other risks through a diversified strategic asset allocation consisting of traditional and alternative assets. Risk is not considered in isolation, but in conjunction with expected investment returns and outcomes for members. Any investment in derivative instruments contributes to risk reduction, or efficient portfolio management.

In designing the Default Investment Option, the Trustees have explicitly considered the trade-off between risk and expected returns.

If members wish to, they can opt to choose their own investment strategy, or one of the alternative lifestyle strategies on joining but also at any other future date.

Assets in the Default Investment Option are invested in the best interests of members and beneficiaries, taking into account the profile of members.

Assets in the Default Investment Option are invested in a manner which aims to ensure the security, quality, liquidity and profitability of a member's portfolio as a whole, in the growth phase and also in the de-risking phase as members approach their selected retirement date.

Assets are invested mainly on regulated markets (those that are not must be kept to prudent levels).

6.2. Policies in relation to the Default Investment Option

In addition to the Trustees' Investment Objectives (covered in Section 3.1), the Trustees believe that:

The *Diversified Lifestyle – Targeting Drawdown* strategy's growth phase structure, which invests in equities and other growth-seeking assets, will provide growth over the long-term with some downside protection and some protection against inflation erosion.

As a member's savings pot grows, investment risk will have a greater impact on member outcomes. Therefore, the Trustees believe that a Default Investment Option that seeks to reduce investment risk as the member approaches retirement is appropriate, by switching automatically to holdings into cash and the Mercer Diversified Retirement Fund.

Based on their understanding of the Plan's membership, an investment strategy that targets drawdown is a suitable Default Investment Option as its objectives are consistent with those of the Trustees, namely to provide a lifestyle path for members looking to target drawdown alongside drawing 25% of their accumulated benefits as tax free cash at retirement. This does not mean that members have to take their benefits in this format at retirement – it merely determines the investment strategy for the Default Investment Option that will be in place pre-retirement. Members who intend

to take their retirement benefits through different arrangements have the option of switching to an alternative lifestyle strategy prior to retirement or even choosing their own investment strategy.

The Trustees believe that the blended Diversified Fund is appropriate as it seeks to provide members with stable asset growth and income throughout the growth phase by investing in a diverse portfolio of liquid growth and defensive assets, and has been specifically designed as a pragmatic end point for de-risking matrices targeting drawdown. It can be held “to and through” retirement on the Scottish Widows platform (albeit members will need to transfer to a personal contract to enter drawdown). As it forms a central component of the majority of the options members will initially have to select from on transferring to the Scottish Widows drawdown platform, using it in the lifestyle strategy pre-retirement allows Scottish Widows to manage transaction costs and out-of-market risk for members entering drawdown.

Taking into account the demographics of the Plan’s membership and the Trustees’ views of how the membership will behave at retirement, the Trustees believe that the current Default Investment Option is appropriate and will continue to review this over time, at least triennially, or after significant changes to the Plan’s demographic or any regulatory or legislation changes, if sooner.

Assets in the Default Investment Option are ultimately invested in daily traded pooled funds which hold highly liquid assets. The pooled funds are commingled investment vehicles which are managed by appointed investment managers. The selection, retention and realisation of assets within the pooled funds are delegated to the respective investment managers in line with the mandates of the funds. Likewise, the investment managers have full discretion (within the constraints of their mandates) on the extent to which social, environmental or ethical conditions are taken into account in the selection, retention and realisation of investments. Section 2 sets out the policy on ESG, Stewardship and Corporate Governance factors. The explicit equity allocation within the Default Investment Option reflects an ESG-tilted approach to help manage ESG-related risks.

Risk is not considered in isolation, but in conjunction with expected investment returns and retirement outcomes for members, further details can be found in Section 3.2. In particular, when choosing and reviewing the investment strategy of the Default Investment Option, the Trustees consider risk quantitatively in terms of the variability of investment returns and potential retirement outcomes for members. From a qualitative perspective, the Trustees also consider risk in terms of the (mis)alignment of investments with the retirement benefits targeted by the Default Investment Option.

6.3. Policies in relation to Illiquid Assets

The Trustees consider illiquid assets as assets of a type which cannot easily or quickly be sold or exchanged for cash, including where such assets are invested as a component of a daily-dealing multi-asset fund. While the Plan’s default arrangement includes no direct allocation to illiquid investments, it has indirect exposure to illiquid assets through the Diversified Fund with a 20% investment in the Insight Broad Opportunities Fund. The Insight Fund is a multi-asset fund that has an allocation of c.7% to illiquid assets in the form of infrastructure investments. Default members six or more years from target retirement date have a 20% allocation to the Insight Fund through the Diversified Fund, with the allocation reducing gradually to zero between

six years and one year from target retirement date. The other funds used in the default strategy do not invest in underlying illiquid assets as at 31 March 2024.

The Trustees are comfortable indirectly investing in a small proportion of illiquid assets through a diversified multi-asset fund, to gain access to the potential for higher returns and benefits of diversification relative to more traditional asset classes (such as bonds or equities) that illiquid assets can offer. While these benefits are recognised by the Trustees, they are also aware of the risks of investment in illiquid assets to members, including accurate valuation and performance measurement challenges, and difficulties for asset managers in realising the underlying investments for cash if required.

In selecting investments for the Default Investment Option the Trustees use both qualitative and quantitative analysis to consider the expected impact of different strategic allocation mixes. For any future investment, the Trustees will carefully consider whether the investment provides value for members, taking account of the return potential and associated risks. It is the Trustees' policy to review the allocation of the Default Investment Option on at least a triennial basis. Such reviews will include the extent to which the incorporation of illiquid asset investments is appropriate.

7. Day to Day Management of the Assets

The fund range offered to members is accessed through the investment platform provided by Scottish Widows since July 2018.

7.1. Main Assets

The Trustees have contracted with Scottish Widows via a long-term insurance contract. The Plan's investment platform is provided under contract with Scottish Widows and Mercer Workplace Savings ("MWS"), both of whom are regulated by the Financial Conduct Authority (the "FCA").

The Trustees undertake to review the investment options offered to members and the investment manager arrangements on a regular basis. The investment options comprise primarily of equity, bonds, diversified growth funds and cash.

7.2. Spread and Suitability of Investments

The Trustees are satisfied that the spread of assets by type, and the investment manager's policies on investing in individual securities within each type, provide adequate diversification of investments. The Investment Consultant monitors the suitability of the investment funds described in Section 4, through ongoing research and performance reviews.

As the assets of the Plan are invested in the pooled fund vehicles underlying the funds offered by Scottish Widows, the investment restrictions applying to these funds are determined by the underlying investment managers.

7.3. Buying and Selling Investments

The investment managers have responsibility for buying and selling the underlying assets of the funds. As already mentioned, the day-to-day activities which the investment managers carry out are governed by the arrangements between them and

Scottish Widows, which are reviewed from time to time to ensure that the operating instructions, guidelines and restrictions remain appropriate.

8. Compliance With This Statement

The Trustees, Scottish Widows and the Investment Consultant each have duties to perform to ensure compliance with this Statement. These are:

The Trustees will monitor compliance with this Statement on a regular basis, and will review this Statement in response to any material changes to any aspects of the Plan, its liabilities, finances and the attitude to risk of the Trustees and the Principal Employer, PGIM European Services Limited. This review will occur no less frequently than every three years and will again be based on expert advice and will be in consultation with the Principal Employer, PGIM European Services Limited.

Scottish Widows will provide full information in respect of transactions in units in the underlying funds and valuations of the units held by the Plan from time to time as required by the Trustees.

The Investment Consultant will provide the advice needed to allow us to review and update this Statement when required.

**Agreed by the Chair of Trustees on 10 June 2024
on behalf of the Board of Trustees of the PGIM UK Retirement Savings Plan**

Appendix A - Powers of Investment

This appendix sets out an extract from the Plan's Trust Deed and Rules covering the Trustees' investment powers.

47.1 Custody of Trust Assets

Subject as otherwise provided in this Rule and Rule 48 (Trustees' powers), the Trustees shall hold the Trust Assets in their name.

47.2 General power of investment

Subject as otherwise provided in this Rule, the Trustees may invest or apply all of any of the Trust Assets and realise, exchange or otherwise deal with all or any of those assets in any manner whatsoever and wheresoever (whether involving liability or not, whether or not producing income and whether or not authorised by law for the investment of funds of an Occupational Pension Scheme) to the intent that the Trustees shall have at least the same powers in that regard as if the Trustees were absolutely entitled to the Trust Assets.

In particular, but without limitation, the Trustees may:

- (A) effect any contract or policy with an insurance company;
- (B) acquire any interest in any property or asset (whether real or personal, whether tangible or not) including, but without limitation, stocks, shares, debentures, bearer securities, units in unit trusts, exempt funds or mutual funds and commodities;
- (C) for the purposes permitted under The Occupational Pension Schemes (Investment) Regulations 2005 acquire, sell or enter into any derivative instruments including without limitation, contracts for differences, financial futures, commodity futures, forward interest rate agreements, interest rate, currency and equity swaps and options to acquire or dispose of any of the foregoing including, without limitation, options on currency and on interest rates;
- (D) retain or place money on deposit or in a current account with any bank, local authority, insurance company, building society or finance company for such period, at such rate of interest (if any) and upon such terms as the Trustees think fit;
- (E) make a loan (with or without security);

- (F) underwrite or sub-underwrite the subscription of any stocks, shares, debentures or other securities;
- (G) apply any (or all) the Trust Assets with a view to tracking any particular index or indices;
- (H) acquire any investment (including units in exempt funds) usually available to the trustees of a Registered Pension Scheme.

47.3 Power to enter into any lawful transaction

The Trustees may borrow but only for the purposes of providing liquidity for the Plan and only on a temporary basis. This sub-rule takes effect subject to s.182 and s.185, FA 2004 (Borrowing).

In addition to the powers vested in them by Rule 47.2 but subject to Rule 47.4, the Trustees, with the consent of the Principal Employer, may:

- (A) give indemnities or undertakings;
- (B) improve, repair and develop land or other property (including, without limitation, the demolition of any building and the redevelopment of any land, building or other property);
- (C) form, promote and finance any company or business;
- (D) charge or pledge or grant any lien over or right of set-off against all or any part of the Trust Assets with the due repayment of and the payment of interest on and of expenses in connection with any money borrowed by the Trustees or as security for the due performance of any other obligation of the Trustees;

and, with like consent, may enter into any other lawful transaction or undertake any other lawful activity which, in either case, is not otherwise authorised but would, in the opinion of the Trustees, benefit the Plan.

47.4 Restrictions on investments

The Trustees' power under this Rule is subject to s.40, PA 1995 (Restriction on employer-related investments) and The Occupational Pension Schemes (Investment) Regulations 2005.

47.5 Commingling

The Trustees may, with the consent of the Revenue, commingle all or any of the Trust Assets with the assets of any other Registered Pension Scheme. In connection with any such commingling, the Trustees may enter into such arrangements as they think fit for the appointment of one or more investment managers of the commingled assets.

47.6 General management powers

In the management or administration of any property forming part of the Trust Assets, the Trustees may effect or concur in effecting any sale, lease, mortgage, charge, standard security, release, purchase, investment, acquisition, expenditure or other disposition, contract or transaction whatsoever not otherwise authorised which a person absolutely and beneficially entitled would have had power to effect or to concur in effecting.

47.7 Members' choice

This sub-rule applies severally to:

- (A) the money and assets from time to time comprising the DC Member's Account; and
- (B) the money and assets from time to time comprising the AVC Fund of a Member

and in this sub-rule the money and assets from time to time comprising the DC Member's Account or the AVC Fund of a Member are called the "Assets".

Where the Trustees give a Member any options with regard to the way in which the money and assets comprising his Assets are invested:

- (A) the Member may from time to time exercise any of those options (such options may be exercised in different ways with regard to different portions of the Assets);
- (B) subject to (C) below, the Trustees:
 - (1) shall give effect to any due exercise of any option as soon as reasonably practicable after the same is made; and
 - (2) shall thereafter continue to give effect to the same until that exercise of the option is countermanded by the Member giving due notice to the Trustees (with or without duly exercising another option in its stead);
- (C) the Trustees shall cease to be bound to give effect to, or, as the case may be, to continue to give effect to, the due exercise of an option if:
 - (1) the Trustees withdraw the option in question as being one which is generally available for the investment of money or assets comprising the DC Member's Account or, as applicable the AVC Fund;
 - (2) it is shown, to the satisfaction of the Trustees, that by reason of any physical disability or mental incapacity the Member is unable to manage his own affairs (the written opinion of a qualified medical practitioner may be accepted by the Trustees as conclusive evidence of this fact);

- (3) the Trustees are notified of the Member's death (the Trustees may, but need not, refuse to accept any such notification unless it is accompanied by the death certificate);
- (4) to give effect, or, as the case may be, to continue to give effect, to the exercise of that option would, or, in the opinion of the Trustees, may, breach any applicable law, regulation or requirement; or
- (5) the occurrence of some event or circumstance is brought to the attention of the Trustees which makes it (in their opinion) inappropriate to continue to follow the Member's directions.

For the purposes of this sub-rule an option shall be regarded as having been duly exercised and a notice shall be regarded as having been duly given if:

- (a) it is in such form and in accordance with such requirements as the Trustees from time to time prescribe, and,
- (b) it is signed, or purportedly signed, by the Member,

or otherwise it is in such form as the Trustees accept.