

LEWIS TRUST GROUP SUPPLEMENTAL PENSION PLAN

STATEMENT OF INVESTMENT PRICIPLES – IMPLEMENTATION STATEMENT – YEAR TO 30 JUNE 2025

This implementation statement from the Trustee of the Supplemental Pension Plan (SPP) aims to facilitate our SPP members' understanding of how the investment principles for the pension scheme are put into practice.

An implementation statement is prepared annually as part of the financial report and accounts and its nature and content will vary as the Trustee and Fund Manager develop its evolving framework.

THE YEAR TO 30TH JUNE 2025.

Historically the SPP has adopted an investment policy aimed at achieving a long-term investment objective of prudently maximising investment returns (both capital and income appreciation) consistent with an acceptable level of risk, through investment of the pension fund assets primarily in worldwide Government and quoted stock market securities, and cash. The investment portfolio as a whole was well diversified and weighted towards equities offering sound prospects for income and growth of capital value – an objective which served members well over the long-term.

During the year 2023 the Trustee, with assistance from its professional advisers, reviewed this strategy with the outcome that the SPP was restructured into three sections with the titles, Westgate GMP section, Whitford section and Buckland section, each with its distinct investment approach. This sectionalisation was designed to more closely align the SPP assets with the underlying nature and future liability and cashflow profile of the members' respective interests in each of the resultant sections. This is expected to act as a risk mitigation measure and to reduce the effects of future potential market investment volatility for the benefit of members.

The sectionalised revised investment strategies may be summarised as follows;

- The Westgate GMP section comprises a bespoke fixed income portfolio targeting pre-defined cash flow projections, primally invested in UK Government bonds ('gilts') with maturities to match the pension payment projections. These gilt investments are expected to be held until their various respective maturities. The revised investments have been implemented from the sales proceeds of the previous equity based investments.
- The Whitford section investments are also structured as a bespoke portfolio targeting pre-defined cash flow obligations, invested in corporate and UK Government bonds matching the value and timing of the cash flow liabilities. This section's portfolio has been established by a cash transfer from the main SPP fund.
- The Buckland section portfolio has been re-established with the objective of prudent long-term growth of its capital value, and maximisation of long-term overall return with moderate fluctuation in capital value. This significant re-arrangement of investments was conducted in phases and was completed in the second half of 2023. Equity investments are largely held through indirect third party funds (previously direct investments) and an element of fixed income investment through UK Government bonds and third party funds has been introduced. At 30.6.25, equities accounted for some 76%, fixed income 19%, with a 5% cash balance.

In light of the sectionalisation of the SPP, individual section statements of investment principles have been prepared which replaced the SPP's previous single statement of investment principles. Given

the asset/liability matching nature within the Westgate GMP and Whitford sections, those underlying investments held are likely to remain relatively static over time, but all sections will continue to be monitored and reviewed in the light of market conditions and the evolving liability profiles. In addition to monthly and quarterly investment reporting, the Fund Manager (Stonehage Fleming Investment Management Ltd) and the Trustee are also progressing arrangements to establish mechanisms for the inclusion of ESG and governance aspects within the management, monitoring and investment performance measurements of the fund portfolios, appropriate to each of the three sections.

Gilts and corporate bonds do not typically carry voting rights. Give the predominant use of pooled funds for other investments, there is limited scope for the Trustee to directly influence voting. Where voting rights apply, the Trustee delegates voting activity to its investment manager who believes that voting and engagement can be value creating and it is in the best interests of its clients to ensure that votes on third party fund investments are thoroughly looked into and advised on, as well as ensuring that the underlying third party managers are conducting their voting and engagement activities to a level that is appropriate for the investment strategy. The investment manager receives guidance from a third-party proxy advisory voting provider, Glass Lewis, and third-party managers commonly use a proxy provider to deliver vote recommendation and execution services”

During the year, the investment manager abstained on a vote to re-elect the Chair of the Nominations and Governance Committee relating to a holding representing 2.6% of the Stonehage Fleming International Fund. This was considered a significant vote as it was cast in the pursuit of governance best practice, given the lack of board diversity.