

## **Combined Nuclear Pension Plan – DC Sections**

### **Statement of Investment Principles**

This Statement sets out the principles for investing the assets of the Defined Contribution (“DC”) Structure, ShiftPay Pension Plan (“SPPP”) and Additional Voluntary Contributions (“AVC”) sections of the Combined Nuclear Pension Plan (the “Plan”) as adopted by the Combined Nuclear Pension Plan Trustees Limited (the “Trustee”).

This Statement has been written in accordance with the Occupational Pension Schemes (Administration, Investment, Charges and Governance) and Pensions Dashboards (Amendment) Regulations 2023 and Section 35 of the Pensions Act 1995 (as amended by Section 244 of the Pension Act 2004) and is consistent with the Trustee’s investment powers as set out in the Trust Deed (clauses 11 and 12). It also takes into account the Pensions Regulator’s (“tPR”) General Code of Practice.

In preparing this statement the Trustee has consulted with the Lead Company, the Nuclear Decommissioning Authority (“NDA”), as sponsor to the Plan, and has taken and considered written advice from the Plan’s Investment Advisers, Redington Ltd. Participating employers within the Plan have signed a ‘Deed of Participation’ allowing the NDA to act on their behalf in consultation with the Trustee.

The Trustee will review this Statement every three years or more frequently as considered appropriate by the Trustee, and specifically in response to legislative and regulatory changes, changes to the investment strategy or a marked change in the membership profile.

The Plan has a Defined Benefit (“DB”) Structure and a DC Structure. Some DB members also pay contributions based on shift pay to a defined contribution arrangement, the SPPP, and all DB members have the option to make AVCs. This Statement is in relation to the Plan’s DC Structure, SPPP and AVC sections only. The Trustee has prepared a separate Statement in relation to the Plan’s DB Structure that can be located in the publicly accessible document library on the Combined Nuclear Pension Plan website.

The power and obligation for deciding on the strategic investment policy rests with the Trustee. However, the Trustee has established an Investment Sub-Committee (ISC) to deal with the investment issues facing the Trustee. It has delegated specific powers to the ISC around the implementation of the investment strategy within certain parameters in order to achieve a more efficient and effective implementation of any recommended changes to the Plan’s investment arrangements.

*The appendices do not formally form part of the Statement of Investment Principles.*

**Mark Condron**

**Signed for and on behalf of the Trustee of the Combined Nuclear Pension Plan**  
**December 2024**

This Statement of Investment Principles (“SIP”) supersedes the previous version dated December 2023.

# Aims and objectives for the DC Investment Options

## Primary Objective

The primary objective for all investment options under the DC Structure, SPPP and AVCs is to provide, on a defined contribution basis, benefits for members on their retirement or benefits for their dependents on death before retirement.

The Trustee recognises that members have differing investment needs and that these may change over the course of their working lives. It also recognises that members have different attitudes to risk. The Trustee believes that members should be able to make their own investment decisions based on their individual circumstances. The Trustee's objective is therefore to make available a range of investment options that, whilst avoiding excessive complexity, should assist members achieve the following objectives:

- Optimising the value of retirement benefits from the given contributions;
- Protecting the value of those benefits in the years approaching retirement against market falls;
- Protecting the value of those benefits in the years approaching retirement against fluctuations when turning fund values into retirement benefits; and
- Tailoring their investments to meet their own needs.

## Default arrangements

The Trustee has established default investment arrangements because:

- The Plan is a qualifying scheme for auto-enrolment purposes and so must have a default arrangement;
- It should be easy to become a member of the Plan and start building retirement benefits without the need to make any investment decisions; and
- The majority of the Plan's members are expected to have broadly similar investment needs.

## Objectives for the default arrangements

- The main objective of the default arrangements is to support good member outcomes at retirement while subject to a level of investment risk appropriate to the majority of members who do not make active investment choices;
- The default arrangements manage the principal investment risks members face, gradually changing where they are invested as they approach retirement; and
- Reflect that DC Structure and SPPP members are expected to choose different benefits at retirement.

## Choosing the default arrangements

The Trustee believes that understanding the Plan's membership is essential to designing and maintaining a default arrangement which meets the needs of the majority of members.

The Trustee has taken into account a number of aspects of the Plan's membership including:

- The members' age and salary profile;
- The likely sizes of pension pots at retirement;
- The level of income in retirement that members are likely to need; and
- Members' likely benefit choices at and into retirement.

## Other investment options

In addition to the default arrangements, the Plan offers members a choice of investment options because:

- While the default arrangements are intended to meet the needs of a majority of the Plan's members, they may not meet the needs of all members;
- Attitudes to investment risks and the need for investment returns will vary from member to member and will also vary for each member over time and, in particular, as they approach retirement;
- Members have differing investment needs and these needs may change during their working lives;
- Some members will want to be more closely involved in choosing where their contributions are invested; and
- The Trustee recognises the growing importance of ESG and climate change risk for members.

The Plan offers members a number of investment options as alternatives to the default arrangements. The main objectives of the alternative options are to:

- Provide a choice of investment approaches for members who want to be more closely involved in choosing where their pension pot is invested;
- Complement the objectives of the default arrangements;
- Provide a broader choice of levels of investment risk and return;
- Provide a broader choice of investment approaches including ethical and faith-based funds; and
- Help members more closely tailor how their pension pot is invested to their personal needs and attitude to risk.

Nevertheless, the self-select fund range cannot be expected to cover all the investment needs of all members.

### **Choosing the investment options**

In choosing the range of investment options to be made available to members, the Trustee has taken into consideration a number of aspects of the Plan's membership including:

- The members' age and salary profile;
- The likely sizes of members' pension pots at retirement;
- Previous sources of retirement income from the Employers;
- Members' retirement dates and likely benefit choices at retirement;
- The levels of investment risk and return members may be willing to take;
- The degree to which members are likely to take an interest in where their contributions are invested; and
- That members may want responsible, ethical or faith-based investment options.

Additional detail on the investment options can be found in Appendix 1.

The Trustee has appointed providers and fund managers authorised under the Financial Services and Markets Act 2000 to undertake investment business.

The Trustee has agreed the appropriateness of the asset allocation benchmarks, performance benchmarks and the various controls adopted by the managers for each fund in which members can invest. For each fund, the benchmark and guideline controls reflect the Trustee's views on the appropriate balance between maximising the long-term return on investments and minimising short-term volatility and risk for that fund's strategic aim, in keeping with the Trustee's primary objective for all the investment options.

The Trustee reviews the range of funds available on a regular basis. These reviews will consider a range of inputs such as the changing composition of members and member feedback. In addition, the Trustee reviews the performance of the Plan's investments on a regular basis. Advice is received as required from professional advisers.

### **Investment options**

A closed group of DB Structure members still have AVCs invested in the Prudential With Profits Fund but this is not open to new AVC investors.

### **Default arrangements**

The default arrangements are mainly a series of target date funds, where members' contributions are invested in a mix of assets which are expected to deliver growth relative to inflation when members are younger and gradually switches into a mix of assets whose values are expected to be less volatile as members approach retirement.

DC Structure – a series of target date funds which are suitable for members who are expected to use income drawdown in retirement.

Shift Pay Pension Plan – a series of target date funds which are suitable for members who are expected to take all their benefits in cash at retirement.

AVC – There is no default for members commencing AVCs.

### **Self-Select Options**

A range of equity, bond, cash and multi-asset funds which provide appropriate choices for members' different savings objectives, risk profiles and time horizons.

### **Additional Voluntary Contributions**

The Plan provides a facility for all members who are not new joiners to make Additional Voluntary Contributions to buy additional benefits on a money purchase basis.

## **Managing Risk**

### **Risk and return**

The expected levels of investment returns (after the deduction of charges) and risks for the funds used are consistent with the Trustee objectives for these investment options. The expected investment returns and approach to managing investment risks, including financially material considerations such as climate change, are described in greater detail in the relevant headings below.

Full details of the current investment options are provided in the documents DC New Joiners Benefit Structure Investment Guide, Shift Pay Pension Plan Investment Guide and AVC Investment Guide available on the CNPP website.

### **Choosing Investments**

The funds in which members invest are pooled funds, which the Trustee believes are appropriate given the size and nature of the Plan.

The majority of the Plan's assets are invested using a passive (index tracking) approach, the objective of which is for an investment manager to seek to match, rather than exceed, the performance of the chosen benchmark index in relation to the particular fund, or underlying investments. Within each fund the investment manager invests in individual stocks in such a way as to replicate, as closely as possible, the composition of the benchmark index. In adopting this approach, the manager ensures a suitably diversified portfolio.

There are also investment options where the investment manager is expected to outperform a benchmark index through active management of investments. Such funds include those invested in multi-asset funds and cash.

The Trustee is satisfied that the range of funds and the assets held in each fund are suitable in relation to the needs of members.

### **Kinds of investment to be held**

The investment managers may invest in UK and overseas investments including equities, fixed and index linked bonds, and cash. However, the investments in each fund will depend on the nature of each fund, its objective and benchmark and the risk controls which operate.

### **Principal Investment Risks**

The Trustee believes that the three principal investment risks most members will face are:

**Inflation risk** – investment returns over members' working lives may not keep pace with inflation and, as a result, do not produce adequate retirement benefits.

Further from retirement, this risk should be countered by investing in funds which are expected to produce returns well in excess of inflation over the longer term. Approaching retirement, the impact of this risk needs to be balanced against the other main risks members face.

**Benefit conversion risk** – investment conditions just prior to retirement may increase the cost of turning members' fund values into retirement benefits.

For members taking cash at retirement, funds investing in cash deposits and other short-term interest-bearing investments provide a high degree of (but not complete) capital security. Funds investing in a mix of different assets are expected to be broadly suitable for members planning income drawdown during retirement. For members buying an annuity at retirement, the value of funds investing in longer-dated bonds may be expected to broadly follow changes in annuity rates caused by long-term interest rates.

**Volatility/Market risk** – falls in fund values prior to retirement lead to a reduction in retirement benefits.

Funds investing in bonds or a mix of assets or investment techniques may be expected to be subject to lower levels of short-term fluctuation and reduction in values - although there may be occasions when this does not hold true.

### **Other investment risks**

The Trustee has considered the other investment risks members may face. These include:

- The risk that market movements in the period just prior to retirement lead to an increase in the cost of turning members' fund values into retirement benefits.
- The risk that an investment manager will not deliver investment returns in line with the target for the fund, investment markets generally or other investment managers.
- The risk that funds which invest in more illiquid assets will not be able to accept investments or disinvestments requested by the Trustee and/or members.
- The risk that counterparties holding derivative based assets may default leading to a reduction in the value of a fund.
- Interest rate risk – the value of funds which invest in bonds will be affected by changes in interest rates.
- Default risk – for bond funds (where money is lent in return for the payment of interest), the company or government borrowing money fails to pay the interest due or repay the loan.
- The risk that environmental, social and corporate governance (ESG) issues are not reflected in asset prices and/or not considered in investment decision making leading to underperformance relative to expectations.
- The risk that climate change causes a material deterioration in asset values as a consequence of factors including, but not limited to changes in government policy, physical impacts and the expected transition to a low-carbon economy.

### **Managing investment risks**

The Trustee considers the impact of investment risks on long-term investment returns and member outcomes when making investment decisions.

### **Time horizon**

The Trustee monitors the age profile of the Plan's membership to arrive at an appropriate investment horizon when considering all investment risks.

The Plan is open to new entrants from age 16. As a result, given the likelihood of increases in retirement ages in the future, investment risks need to be considered over a time horizon approaching 50 years.

The target date funds manage the three main investment risks as members grow older by automatically switching from assets which are expected to give long-term growth relative to inflation into assets whose values should fluctuate less in the short-term relative to the benefits members are expected to take at retirement. The self-select fund range provides members with a choice of funds with differing risk and return characteristics.

The Trustee manages the other investment risks as part of the process for selecting and ongoing monitoring of the funds used by the Plan. The funds used give a good spread of investments which will help manage risks associated with market conditions. The Trustee believes that the Plan's investment options are appropriate for managing the risks typically faced by members.

In selecting the funds made available to members, the Trustee has tried to ensure that there is a sufficient range of funds across asset classes and risk profiles which can be tailored to members' individual requirements at different ages and terms to retirement.

The decision to appoint only one investment manager for each asset class does involve some degree of manager risk relative to benchmark (which would arise from the potential underperformance of that manager). However, as the majority of the funds the Trustee has made available to members are managed on a passive (index tracking) basis, the risk of underperformance from the manager is materially reduced. Actively managed funds are used where passive management would not be appropriate or viable for the asset class concerned.

### **Financially material considerations**

The Trustee, with their advisers, regularly monitors the Plan's investments to consider the extent to which the investment strategy and decisions of the investment managers are aligned with the Trustee's policies. This includes monitoring the extent to which investment managers:

- make decisions based on assessments about medium-to long-term financial and non-financial performance of an issuer of debt or equity; and
- engage with issuers of debt or equity in order to improve their performance in the medium-to long-term.

The Trustee recognises that the consideration of financially material considerations, including ESG factors and climate risk, are relevant to the development, selection and monitoring of the Plan's investment options.

The Trustee seeks to manage these financially material considerations, to protect long-term returns, by:

- Considering the extent to which ESG issues, including climate risk, where relevant are integrated into the fund managers' investment processes and that the fund managers follow an approach which takes account of financially material factors;
- For actively managed funds (where the fund manager decides where to invest), expecting the fund managers to take financially material considerations into account when selecting which companies and markets to invest in; and
- For passively managed funds, the Trustee selects the benchmarks that incorporates its views and objectives on risk & return, ESG and climate change, etc. This process then drives the decisions of the manager. The Trustee accepts that the role of the passive manager is to deliver returns in line with the benchmark index (which may or may not include ESG factors) and believes this approach is in line with the basis on which their current strategy has been set. The Trustee will review periodically the choice of fund and index benchmarks used and the extent to which these reflect ESG factors.

## Implementation

Before investing in any manner, the Trustee obtains and considers proper written advice from its investment adviser on the question of whether the investment is satisfactory, having regard to the need for suitable and appropriately diversified investments. The Trustee reviews the governing documentation associated with any new investment and will consider the extent to which it aligns with the Trustee's policies. Where possible, the Trustee will seek to amend that documentation so that there is more alignment.

The Trustee has entered into a contract with Aegon, who provide a platform that makes available to members target date funds that reflect the stage at which each individual member is in during their investment journey and a range of self-select funds. There is no direct relationship between the Plan and the underlying investment manager of the DC investment funds. The Trustee recognises that due to the collective nature of these pooled investments, there is less scope to directly influence how the asset manager invests. However, the Trustee's investment advisors ensure the investment objectives and guidelines of the manager are consistent with that of the Trustee where practicable.

The investment manager's primary role is the day-to-day investment management of the Plan's investments and they are authorised under the Financial Services and Markets Act 2000 (as amended) to carry out such activities.

The Trustee and the investment manager, to whom discretion has been delegated, exercise their powers (in line with the principles in this SIP) to encourage business strategies which should improve or protect the value of these investments where reasonably practicable.

The Trustee selects investment managers with an expectation of a long-term arrangement, which encourages active ownership of the underlying assets. When assessing a manager's performance, the focus is on longer-term outcomes, and the Trustee would not expect to terminate a manager's appointment based purely on short-term performance. However, a manager's appointment could be terminated within a shorter timeframe due to other factors such as a significant change in business structure or the investment team.

Alignment between an investment manager's management of each pooled fund's assets and the Trustee's policies and objectives are a fundamental part of the appointment process of a new manager or strategy.

The following steps are taken to encourage alignment between the Plan and the managers:

- Before investing, the Trustee will seek to understand the manager's approach to ESG (including engagement and climate change). The Trustee has limited influence over managers' investment practices because all the Plan's assets are held in pooled funds. However, the Trustee will ensure the investment objectives and guidelines of the vehicle are consistent with its own objectives where practicable.
- To maintain alignment, managers are provided with the most recent version of the Plan's SIP, which includes the Trustee's policy on sustainable investment, on an annual basis and are required to explicitly confirm that the assets are managed in line with the Trustee's policies as outlined in those documents.
- Should the Trustee's monitoring process reveal that a manager's portfolio is not aligned with the Trustee's policies, the Trustee will engage with the manager further to encourage alignment. This monitoring process includes specific consideration of the sustainable investment and ESG characteristics of the

portfolio and managers' engagement activities. If, following engagement, it is the view of the Trustee that the degree of alignment remains unsatisfactory, the manager may be terminated and replaced.

Additionally, the Trustee has a preference for fund managers who are signatories to the Financial Reporting Council's Stewardship Code in the UK and the United Nations supported Principles for Responsible Investment.

Managers are paid an ad valorem fee, in line with normal market practice, for a given scope of services which includes consideration of long-term factors and engagement. The Trustee reviews the costs and value for money incurred in managing the Plan's assets annually, which includes the costs associated with portfolio turnover. In assessing the appropriateness of the portfolio turnover costs at an individual manager level, the Trustee will have regard to the actual portfolio turnover and how this compares with the expected turnover range for that mandate. On a quarterly basis the Trustee also monitors manager performance relative to the relevant benchmark, with a focus on long-term performance.

### **Expected return on investments**

The objective of the equity and multi-asset funds is to achieve an attractive real (above inflation) return over the longterm. The objective of the cash and bond funds is to provide for the payment of the tax-free lump sum on retirement and to reduce the volatility of the cost of the annuity that may be purchased, rather than to achieve a specified 'real' or 'nominal' return.

The Trustee is also satisfied that these return objectives are consistent with the aims of members at different stages within the lifestyle process.

<b>Asset class</b>	<b>Expected long-term investment returns relative to inflation</b>	<b>Expected shorter- term volatility in fund values</b>
Equities (i.e. company shares)	Strong return relative to inflation	Most volatile in the short-term
Multi-asset funds (i.e. investing in a varying mix of asset classes)	Positive relative to inflation over the longer-term	Lower than equities
Corporate Bonds (i.e. loan stocks issued by companies)	Positive, but lower than equities	Lower than equities
Long-dated Bonds (e.g. UK Gilts and Corporate Bonds with a duration of 15 years or more)	Broadly in line with the financial factors influencing annuity rates	Lower than equities
Fixed Interest Government Bonds (e.g. UK Gilts)	Positive, but lower than equities, or corporate bonds	Lower than equities or corporate bonds
Index-Linked Government Bonds (e.g. UK Index-Linked Gilts)	In line with inflation	Lower than equities or corporate bonds
Cash (and other short-term interest-bearing investments)	Return may not keep pace with inflation	Minimal with high degree (but not complete) of capital security

### **Investment beliefs**

The Trustee's investment decisions are made in the context of its investment beliefs that:

- Managing the principal investment risks (inflation, benefit conversion and volatility) is the most important driver of good long-term member outcomes;
- As the Plan invests for members over the long-term, financially material considerations including ESG factors and the impact of climate change will have a bearing on funds' expected levels of risk and return;
- Investment markets may not always behave in line with long-term expectations during the shorter-term;
- Charges and costs (levied by fund managers and platform providers) can have a material effect on net returns.

### **Investment policy on illiquid assets**

The default arrangement for the Plan does not currently invest in illiquid assets but has small allocation in properties via a REITs fund. Younger members have around a 5% exposure to REITs. This exposure decreases gradually to around 0.5% one year before their retirement. These assets are invested by BlackRock, the investment manager, in respect of the qualifying collective money purchase scheme via a collective investment scheme under Non-UCITS Retail Schemes (NURS) rules.

The Trustee believes that there may be financial benefits to investing in illiquid assets. However, the Trustee notes the following challenges: 1) illiquid assets typically have higher fees and transaction costs than liquid assets, which may reduce the net returns for members; 2) Illiquid assets may have longer lock-up periods or limited redemption windows, which may not suit the liquidity needs of DC members who want to access their pension pots flexibly; and 3) Illiquid assets may have lower transparency and valuation frequency than liquid assets, which may make it harder for members to monitor their investment performance and risks. However, the Trustee plans to explore the feasibility of increasing investment in illiquid assets with its investment adviser and investment manager, and to keep its policy on illiquid investments under regular review.

### **Types of funds used and Delegation of investment decisions**

The Plan uses unit-linked funds provided through an investment platform. This investment platform in turn invests in funds provided by a selection of fund managers where investments are pooled with other investors. This enables the Plan to invest in a range of funds giving a good spread of investments in a cost-effective manner. It does mean that the Trustee has delegated day to day investment decisions, including the management of financially material considerations, to the fund managers.

### **Security of assets**

The security of funds is provided through policies of insurance issued to the Trustee by the investment platform provider and the With Profits Fund provider. As a result, the value of the funds may be affected in the event of the providers getting into financial difficulties.

The underlying funds used by the investment platform provider are mostly accessed through unit purchase agreements. In the event of a fund manager getting into financial difficulties, the values in these underlying funds will depend upon the nature of the contract with the platform provider and the fund vehicles used by the fund managers' funds.

### **Realisation of investments**

The Trustee expects that the investment platform provider and the fund managers will normally be able to sell the funds within a reasonable timescale. There may, however, be occasions where the investment platform or fund managers need to impose restrictions on the timing of sales and purchases of funds in some market conditions to protect the interests of all investors in that fund.

Nevertheless, the Trustee recognises that most members' pension accounts have a long investment timeframe, during which assets which are less easily traded can be managed to deliver good long-term returns while avoiding the impact of liquidity issues at retirement.

### **Balance of investments**

Overall, the Trustee believes that the Plan's investment options:

- Provide a balance of investments; and
- Are appropriate for managing the risks typically faced by members.

## **Stewardship**

### **Stewardship**

The Trustee recognises that an important part of its role as a steward of capital is to ensure the highest standards of governance and promotion of corporate responsibility in the underlying companies and assets in which the Plan invests, as ultimately this creates long-term financial value for the Plan and its beneficiaries. The Trustee recognises that good stewardship practices, including engagement and voting activities, are important as they help preserve and enhance asset value over the long-term.

### **Members' financial interests**

The Trustee expects that the investment platform provider and fund managers will have the members' financial interests as their first priority when choosing investments.

### **Voting and engagement**

The Trustee believes that engagement with the companies in which the Plan invests, including the proactive use of shareholder voting rights, can improve the longer-term returns on the Plan's investments.

The Plan invests via an investment platform provider, who in turn invest in funds which are pooled with other investors to keep costs down and ensure adequate diversification. As a result, the Trustee has adopted a policy of delegating voting decisions on stocks to the underlying fund managers on the basis that voting power will be exercised by them with the objective of preserving and enhancing long term shareholder value. The fund managers are expected to exercise the voting rights attached to individual investments in accordance with their own house policy.

The Trustee expects its investment managers to practice good stewardship. This includes monitoring, engaging with issuers of debt or equity on relevant matters such as performance, strategy, risks, capital structure, conflicts of interest and environmental, social or governance considerations, and using voting rights



to effect the best possible long-term outcomes.

Where relevant, the Trustee has reviewed the voting and engagement policies of the fund managers as well as the approach to governance of the investment platform provider and determined that these policies are appropriate. On an annual basis, the Trustee will request that the investment platform provider and fund managers provide details of any change in their house policy.

Where appropriate, the Trustee will engage with and may seek further information from the investment platform provider and fund managers on how portfolios may be affected by a particular issue. If an incumbent fund manager is found to be falling short of the Trustee's standards, the Trustee will undertake to engage with the fund manager and seek a more sustainable position.

When selecting, monitoring and de-selecting asset managers, stewardship is factored into the decision-making process to the appropriate level for the specific asset class in question.

The Trustee does not engage directly, but believes it is sometimes appropriate for the fund managers to engage with key stakeholders, or relevant persons, which may include corporate management, regulators and governance bodies, relating to their investments in order to improve corporate behaviours, improve performance and mitigate financial risks. The Trustee aims to review engagement activity undertaken by the fund managers as part of its broader monitoring activity.

The Trustee expects the investment platform provider to adopt similar practices with regards to the inclusion and ongoing oversight of fund managers on their platform. The Trustee also expects the platform provider to be able to evidence their own governance practices on request.

### **Monitoring**

The Trustee receives reports from the investment platform provider on the fund managers voting activity on a periodic basis.

The Trustee reviews the fund managers' voting activity on a periodic basis in conjunction with their investment adviser and use this information as a basis for discussion with the investment platform provider and fund managers. Where the Trustee deems it appropriate, any issues of concern will be raised with the manager for further explanation.

The Trustee meets with the investment platform provider on a regular basis. The fund managers may be challenged both directly by the Trustee and by their investment advisers on the impact of any significant issues including, where appropriate, ESG issues that may affect the prospects for return from the portfolio.

### **Non-financial factors**

The Trustee recognises that some members will have strong personal views or religious convictions that influence where they believe their savings should, or should not, be invested.

The Trustee notes that a large majority of members have not made active investment choices and so the Trustee believes that most members are unlikely to have strong views on where their savings are invested. The Trustee will instead take into account what, in its reasonable opinion, members' views of non-financial factors are likely to be.

The Trustee notes that the arrangements for receiving member feedback on the Plan in general give members an opportunity to express views on non-financial factors relating to the Plan's investments.

The Plan offers a Sharia Law based fund for members who hold convictions in line with the Islamic faith.

The Trustee notes that non-financial factors can affect various investment risks which are borne by members and may under-perform other funds with broader-based investment approaches.

Fund managers are otherwise only expected to take non-financial factors into account when these do not conflict with the financial interests of members and the Plan's investment objectives.

## Appendix 1: Investment Implementation Document

The funds available to members are:

Fund	Total Expense Ratio (effective from 07/11/2024)
CNPP UK Equity Fund	0.14
CNPP Global Equity Fund	0.14
CNPP Global Equity (ex-UK) Fund	0.14
CNPP Emerging Markets Equity Fund	0.32
CNPP Sharia Fund	0.44
CNPP Multi-Asset Fund	0.54
CNPP ESG Multi-Asset Fund	0.37
CNPP Pre Retirement Fund	0.29
CNPP Index-Linked Gilt Fund	0.14
CNPP Corporate Bonds Fund	0.14
CNPP Cash Fund	0.13
Aegon BlackRock LifePath Flexi Funds*	0.19
Aegon BlackRock LifePath Capital Funds*	0.19
Aegon BlackRock LifePath Retirement Funds	0.19
Prudential With-Profits Fund**	0.96

\* Default options.

\*\* Only available for existing AVC investments – closed to future AVCs.

### Notes

- The LifePath Funds are sets of 'target date' funds, each managed to an asset allocation appropriate to its target retirement age range and target retirement benefits.
- The CNPP and Aegon BlackRock funds are provided through the Aegon administration and investment contract.
- The CNPP labelled funds invest in underlying investment managers' funds through the Aegon platform.

### Default arrangements

For members who are invested in the Aegon BlackRock LifePath Flexi option the following chart illustrates the changes to fund allocations that will be implemented on members behalf up to their retirement date:

[06]

For members who are invested in the Aegon BlackRock LifePath Capital option the following chart illustrates the changes to fund allocations that will be implemented on members behalf up to their retirement date:

[OBJ]