Heidelberg Group Pension Scheme

Statement of Investment Principles

Barnett Waddingham LLP

16 October 2023

Contents

1. Introduction 3
2. Choosing investments 3
3. Investment objectives 3
4. Kinds of investments to be held 4
5. The balance between different kinds of investments 4
6. Risks 4
   Risk versus the liabilities 5
   Covenant risk 5
   Solvency and mismatching 5
   Asset allocation risk 5
   Liquidity risk 5
   Investment manager risk 5
   Governance risk 5
   ESG/Climate risk 5
   Concentration risk 5
   Currency risk 5
   Loss of investment 5
7. Expected return on investments 6
8. Realisation of investments 6
9. Financially material considerations, non-financially material considerations, the exercise of voting rights and engagement activities 6
10. Policy on arrangements with asset managers 6
11. Agreement 8
Appendix 1 Financially material considerations, the exercise of rights and engagement activities, and non-financial matters 9
1. Financially Material Considerations 9
2. Non-financially material considerations 10
3. The exercise of voting rights 10
4. Engagement activities 11
Appendix 2 Note on investment policy of the Scheme's DB Section in relation to the current Statement of Investment Principles dated October 2023 12
1. The balance between different kinds of investment 12

BARNETT WADDINGHAM
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1. Introduction

1.1. This is the Statement of Investment Principles prepared by the Trustee of the Heidelberg Group Pension Scheme (the "Scheme"). This statement sets down the principles which govern the decisions about investments that enable the Scheme to meet the requirements of:

- the Pensions Act 1995, as amended by the Pensions Act 2004;
- the Occupational Pension Schemes (Investment) Regulations 2005 as amended by the Occupational Pension Schemes (Investment) (Amendment) Regulations 2010;
- the Occupational Pension Schemes (Charges and Governance) Regulations 2015;
- the Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018; and
- the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019.

1.2. In preparing this statement the Trustee has consulted Heidelberg Graphic Equipment Limited (the "Principal Employer") and obtained advice from Barnett Waddingham LLP, the Trustee's investment consultants. Barnett Waddingham is authorised and regulated by the Financial Conduct Authority.

1.3. This statement has been prepared with regard to the 2001 Myners review of institutional investment (including subsequent updates), and Scheme Funding legislation.

1.4. The Trustee will review this statement at least every three years or if there is a significant change in any of the areas covered by the statement.

1.5. The investment powers of the Trustee are set out in Rule 30 of the Replacement Definitive Trust Deed & Rules, dated 16 February 2004. This statement is consistent with those powers.

2. Choosing investments

2.1. The Trustee's policy is to set the overall investment target and then monitor the performance of their managers against that target. In doing so, the Trustee considers the advice of their professional advisers, who they consider to be suitably qualified and experienced for this role.

2.2. The day-to-day management of the Scheme's assets is delegated to one or more investment managers. The Scheme's investment managers are detailed in the Appendices to this Statement. The investment managers are authorised and regulated by the Financial Conduct Authority, and are responsible for stock selection and the exercise of voting rights.

2.3. The Trustee reviews the appropriateness of the Scheme's investment strategy on an ongoing basis. This review includes consideration of the continued competence of the investment managers with respect to performance within any guidelines set. The Trustee will also consult the employer before amending the investment strategy.

3. Investment objectives

3.1. The Trustee has discussed key investment objectives in light of an analysis of the Scheme's liability profile as well as the constraints the Trustee faces in achieving these objectives.

3.2. The Trustee's main investment objectives are to:

- ensure the Scheme can meet members' entitlements under the Trust Deed and Rules as they fall due;
- manage the expected volatility of the returns achieved in order to control the level of volatility in the Scheme's required contribution levels; and
- invest in assets of appropriate liquidity which will generate income and capital growth to meet, together with new contributions from the participating employers, the cost of current benefits which the Scheme provides.

3.3. The Trustee is aware of the relationship that exists between the particular investment portfolio that is held and the level of funding of the Scheme's liabilities. The Trustee has obtained exposure to investments that they expect will meet the Scheme's objectives as best as possible.

4. Kinds of investments to be held

4.1. The Scheme is permitted to invest in a wide range of assets including equities, bonds, cash, property and alternatives.

4.2. The Trustee monitors from time-to-time the employer-related investment content of their portfolio as a whole and will take steps to alter this should they discover this to be more than 5% of the portfolio. Typically this check is carried out annually by the Scheme's auditors.

5. The balance between different kinds of investments

5.1. The Scheme invests in assets that are expected to achieve the Scheme's objectives. The allocation between different asset classes is contained within Appendix 2 to this Statement.

5.2. The Trustee considers the merits of both active and passive management for the various elements of each Section's portfolio and may select different approaches for different asset classes. The current arrangements are set out in the Appendices to this Statement.

5.3. From time to time the Scheme may hold cash and therefore deviate from its strategic or tactical asset allocation in order to accommodate for any short-term cashflow requirements or any unexpected items.

5.4. The Trustee is aware that the appropriate balance between investments will vary over time and therefore the asset allocation of the Scheme will be expected to change as the Scheme's liability profile matures.

6. Risks

6.1. The Trustee has considered the following risks for the Scheme with regard to its investment policy and the Scheme's liabilities, and considered ways of managing/monitoring these risks:

Risk versus the liabilities	The Trustee will monitor and review the investment strategy with respect to the liabilities in conjunction with each actuarial valuation. The investment strategy will be set with consideration to the appropriate level of risk required for the funding strategy as set out in the Scheme's Statement of Funding Principles.
Covenant risk	The creditworthiness of the employers and the size of the pension liability relative to the employers' earnings are monitored on a regular basis. The appropriate level of investment risk is considered with reference to the strength of the employer covenant.
Solvency and mismatching	The risk is addressed through the asset allocation strategy and ongoing triennial actuarial valuations. The Trustee is aware that the asset allocation required to minimise the volatility of the solvency position may be different from that which would minimise the volatility on the Scheme's funding basis.
Asset allocation risk	The asset allocation is detailed in Appendix 2 to this Statement and is monitored on a regular basis by the Trustee.
Liquidity risk	The Scheme invests in assets such that there is a sufficient allocation to liquid investments that can be converted into cash at short notice given the Scheme's cashflow requirements. The Scheme's administrators assess the level of cash held in order to limit the impact of the cashflow requirements on the investment policy.
Investment manager risk	The Trustee monitors the performance of each of the Scheme's investment managers on a regular basis in addition to having meetings with each manager from time to time as necessary. The Trustee has a written agreement with each investment manager, which contains a number of restrictions on how each investment manager may operate.
Governance risk	Each asset manager is expected to undertake good stewardship and positive engagement in relation to the assets held. The Trustee monitors these and will report on the managers' practices in their annual Implementation Statement.
ESG/Climate risk	The Trustee has considered long-term financial risks to the Scheme and concluded that ESG factors as well as climate risk are potentially financially material. The Trustee will continue to develop its policy to consider these, alongside other factors, when selecting or reviewing the Scheme's investments.
Concentration risk	Each investment manager is expected to manage broadly diversified portfolios and to spread assets across a number of individual shares and securities.
Currency risk	The Scheme's liabilities are denominated in sterling. The Scheme may gain exposure to overseas currencies by investing in assets that are denominated in a foreign currency or via currency management. Currency hedging is employed to manage the impact of exchange rate fluctuations.
Loss of investment	The risk of loss of investment by each investment manager and custodian is assessed by the Trustee. This includes losses beyond those caused by market movements (e.g. default risk, operational errors or fraud).

7. Expected return on investments

7.1. The Trustee has regard to the relative investment return and risk that each asset class is expected to provide. The Trustee is advised by their professional advisors on these matters, who they deem to be appropriately qualified experts. However, the day-to-day selection of investments is delegated to the investment managers.

7.2. The Trustee recognises the need to distinguish between nominal and real returns and to make appropriate allowance for inflation when making decisions and comparisons.

7.3. In considering the expected return from investments, the Trustee recognises that different asset classes have different long-term expected returns and expected volatilities relative to the liabilities of the Scheme.

7.4. Having established the investment strategy, the Trustee monitors the performance of each investment manager against an agreed benchmark as frequently as appropriate according to market conditions and the Scheme's funding position. The Trustee meets the Scheme's investment managers as frequently as is appropriate, in order to review performance.

8. Realisation of investments

8.1. The Trustee has delegated the responsibility for buying and selling investments to the investment managers. The Trustee has considered the risk of liquidity as referred to above.

8.2. Ultimately, the investments will all have to be sold when the Scheme's life comes to an end. In this situation, the Trustee is aware of the fact that the realisable value of some investments, were there to be a forced sale, might be lower than the market value shown in the Scheme accounts.

9. Financially material considerations, non-financially material considerations, the exercise of voting rights and engagement activities

9.1. The Trustee has set policies in relation to these matters. These policies are set out within Appendix 1 to this statement.

10. Policy on arrangements with asset managers

Incentivising alignment with the Trustee's investment polices

10.1. Prior to appointing an investment manager, the Trustee discusses the investment manager's approach to the management of ESG and climate related risks with the Scheme's investment consultant, and how their policies are aligned with the Trustee's own investment beliefs.

10.2. When appointing an investment manager, in addition to considering the investment manager's investment philosophy, process and policies to establish how the manager intends to make the required investment returns, the Trustee also considers how ESG and climate risk are integrated into these. If the Trustee deems any aspect of these policies to be out of line with their own investment objectives for the part of the portfolio being considered, they may consider using another manager for the mandate.

10.3. The Trustee carries out a strategy review at least every three years where they assess the continuing relevance of the strategy in the context of the Scheme's membership and their aims, beliefs and constraints. The Trustee monitors the investment managers' approach to ESG and climate related risks on an annual basis.

10.4. In the event that an investment manager ceases to meet the Trustee's desired aims, including the management of ESG and climate related risks, using the approach expected of them, their appointment may be terminated.

Incentivising assessments based on medium to long term, financial and non-financial considerations

10.5. The Trustee is mindful that the impact of ESG and climate change has a long-term nature. However, the Trustee recognises that the potential for change in value as a result of ESG and climate risk may occur over a much shorter term than climate change itself.

10.6. When considering the management of objectives for an investment manager (including ESG and climate risk objectives), and then assessing their effectiveness and performance, the Trustee assesses these over a rolling timeframe. The Trustee believes the use of rolling timeframes, typically 3 to 5 years, is consistent with ensuring the investment manager makes decisions based on an appropriate time horizon. Where a fund may have an absolute return or shorter term target, this is generally supplementary to a longer term performance target. In the case of assets that are actively managed, the Trustee expects this longer term performance target to be sufficient to ensure an appropriate alignment of interests.

10.7. The Trustee expects investment managers to be voting and engaging on behalf of the Scheme's holdings and the Scheme monitors this activity within the Implementation Statement in the Scheme's Annual Report and Accounts. The Trustee does not expect ESG considerations to be disregarded by the investment managers in an effort to achieve any short term targets.

Method and time horizon for assessing performance

10.8. The Trustee monitors the performance of their investment managers over medium to long term periods that are consistent with the Trustee's investment aims, beliefs and constraints.

10.9. The Scheme invests in pooled funds. The investment manager is remunerated by the Trustee based on the assets they manage on behalf of the Trustee. As the funds grow, due to successful investment by the investment manager, they receive more and as values fall they receive less. In some instances, a performance fee may also be applied.

10.10. The Trustee believes that this fee structure, including the balance between any fixed and performance related element, enables the investment manager to focus on long-term performance without worrying about short term dips in performance significantly affecting their revenue.

10.11. The Trustee asks the Scheme's investment consultant to assess if the asset management fee is in line with the market when the manager is selected, and the appropriateness of the annual management charges are considered regularly as part of the review of the Statement of Investment Principles.

Portfolio turnover costs

10.12. The Trustee acknowledges that portfolio turnover costs can impact on the performance of their investments. Overall performance is assessed as part of the quarterly investment monitoring process.

10.13. During the investment manager appointment process, the Trustee may consider both past and anticipated portfolio turnover levels. When underperformance is identified, deviations from the expected level of turnover may be investigated with the investment manager concerned if it is felt they may have been a significant contributor to the underperformance. Assessments reflect the market conditions and peer group practices. The Trustee acknowledges that for some asset classes, such as LDI, a higher turnover of contracts such as repurchase agreements, can be beneficial to the fund from both a risk and cost perspective.

Duration of arrangement with asset manager

10.14. For the open-ended pooled funds in which the Scheme invests, there are no predetermined terms of agreement with the investment managers.

10.15. The suitability of the Scheme's asset allocation and its ongoing alignment with the Trustee's investment beliefs is assessed every three years, or when changes deem it appropriate to do so more frequently. As part of this review the ongoing appropriateness of the investment managers, and the specific funds used, is assessed.

10.16. For closed ended funds, the Scheme reviews the appointment with the investment manager at, or just prior to, maturity of the closed-ended fund.

11. Agreement

11.1. This statement was agreed by the Trustee on 16 October 2023, and replaces any previous statements. Copies of this statement and any subsequent amendments will be made available to the employer, the investment managers, the actuary and the Scheme auditor upon request.

Appendix 1 Financially material considerations, the exercise of rights and engagement activities, and non-financial matters

1. Financially Material Considerations

The Trustee considers that factors such as environmental, social and governance (ESG) issues (including but not limited to climate change) will be financially material for the Scheme over the length of time during which the benefits provided by the Scheme for members require to be funded to a level which would allow the benefits to be bought out with an insurer. This is likely to be not less than five years from the date of this Statement of Investment Principles.

The Trustee has elected to invest the Scheme's assets through pooled funds. The choice of underlying funds is made by the Trustee after taking advice from their investment consultant. The Trustee, and the managers of the underlying funds, take into account ESG factors (including climate change risks) in their decisions in relation to the selection, retention and realisation of investments.

The Trustee takes those factors into account in the selection, retention and realisation of investments as follows:

Selection of investments: assess the investment managers' ESG integration credentials and capabilities, including stewardship, as a routine part of requests for information/proposals as well as through other regular reporting channels.

Retention of investments: Developing a robust monitoring process in order to monitor ESG considerations on an ongoing basis by regularly seeking information on the responsible investing policies and practices of the investment managers.

Realisation of investments: The Trustee will request information from investment managers about how ESG considerations are taken into account in decisions to realise investments.

The Trustee will continue to monitor and assess ESG factors, and risks and opportunities arising from them. Through their investment consultant the Trustee will request that all of the Scheme's investment managers provide information about their ESG policies, and details of how they integrate ESG into their investment processes on an annual basis.

The Trustee appreciates that the method of incorporating ESG factors into the investment strategy and process will differ between asset classes. A summary of the Trustee's views for each asset class in which the Scheme invests is outlined below.

Target return and private market multi-asset funds

The Trustee believes that ESG issues will be financially material to the risk-adjusted returns achieved by the Scheme's target return and private market multi-asset fund managers over the intended time horizon for the investment in question. The investment process for any target return or private market multi-asset fund manager should take ESG into account when selecting holdings. The Trustee also supports engagement activities and, where relevant, the exercise of rights attaching to the investments by the Scheme's target return and private market multi-asset fund managers. However, the process for incorporating ESG issues should be consistent with, and proportionate to, the rest of the investment process.

Corporate bonds and private credit funds

The Trustee believes that ESG issues will be financially material to the risk-adjusted returns achieved by the Scheme's credit holdings over the Trustee's intended time horizon for the investment in question. The investment process for the manager should take ESG into account when selecting holdings. The Trustee also supports engagement activities, although they appreciate that fixed income assets do not typically provide voting rights. The process for incorporating ESG issues should be consistent with, and proportionate to, the rest of the investment process.

Passive gilts, Liability Driven Investment and cash

The Trustee believes that ESG issues are not financially material to the risk-adjusted returns achieved by the Scheme's gilts, Liability Driven Investment strategy and cash funds as there is not significant scope to improve risk-adjusted returns. The purpose of these investments is to provide a hedge against the Scheme's exposure to movements in nominal interest rates and inflation.

2. Non-financially material considerations

The Trustee do not take into account the views of Scheme members and beneficiaries in relation to ethical considerations, social and environmental impact, or present and future qualify of life of the members and beneficiaries of the Scheme (referred to as "non-financial matters" in the relevant Regulations) in the selection, retention and realisation of investments.

3. The exercise of voting rights

The Trustee's policy on the exercise of rights attaching to investments, including voting rights, and in undertaking engagement activities in respect of the investments is that these rights should be exercised by the investment managers on the Trustee's behalf. In doing so, the Trustee expects that the investment managers will use their influence as major institutional investors to exercise the Trustee's rights and duties as shareholders, including where appropriate engaging with underlying investee companies to promote good corporate governance, accountability and to understand how those companies take account of ESG issues in their businesses.

The Trustee will monitor and engage with the investment managers about relevant matters (including matters concerning an issuer of debt or equity, including their performance, strategy, capital structure, management of actual or potential conflicts of interest, risks, social and environmental impact and corporate governance), through the Scheme's investment consultant.

Investment managers will be asked to provide details of their stewardship policy and engagement activities on at least an annual basis. The Trustee will, with input from their investment consultant, monitor and review the information provided by the investment managers. Where possible and appropriate, the Trustee will engage with their investment managers for more information and ask them to confirm that their policies comply with the principles set out in the Financial Reporting Council's UK Stewardship Code.

4. Engagement activities

The Trustee acknowledges the importance of ESG and climate risk within their investment framework. The investment manager has discretion over where in an investee company's capital structure it invests (subject to the restrictions of the mandate), whether directly or as an asset within a pooled fund.

The Trustee is of the belief that ESG and climate risk considerations extend over the entirety of a company's corporate structure and activities, i.e. that they apply to equity, credit and property instruments or holdings. The Trustee also recognises that ESG and climate related issues are constantly evolving and along with them so too are the products available within the investment management industry to help manage these risks.

The Trustee considers it to be a part of their investment managers' roles to assess and monitor developments in the capital structure for each of the companies in which the managers invest on behalf of the Scheme or as part of the pooled fund in which the Scheme holds units.

The Trustee also considers it to be part of their investment managers' roles to assess and monitor how the companies in which they are investing are managing developments in ESG related issues, and in particular climate risk, across the relevant parts of the capital structure for each of the companies in which the managers invest on behalf of the Scheme.

Should an investment manager be failing in these respects, this should be captured in the Scheme's regular performance monitoring.

Through their consultation with the Principal Employer when setting this Statement of Investment Principles, the Trustee has made the Principal Employer aware of their policy on ESG and climate related risks, how they intend to manage them and the importance that the pensions industry as a whole, and its regulators, place on them.

The Scheme's investment consultant is independent and no arm of their business provides asset management services. This, and their FCA Regulated status, makes the Trustee confident that the investment manager recommendations they make are free from conflict of interest.

The Trustee expects all investment managers to have a conflict of interest policy in relation to their engagement and ongoing operations. In doing so the Trustee believes they have managed the potential for conflicts of interest in the appointment of the investment manager and conflicts of interest between the Trustee, investment manager and the investee companies.

In selecting and reviewing their investment managers, where appropriate, the Trustee will consider investment managers' policies on engagement and how these policies have been implemented.

Appendix 2 Note on investment policy of the Scheme's DB Section in relation to the current Statement of Investment Principles dated October 2023

1. The balance between different kinds of investment

The Scheme has a strategic asset allocation as set out in the table below, which has been agreed after considering the Scheme's liability profile, funding position, expected return of the various asset classes and the need for diversification.

Rebalancing

The Trustee recognises that the asset allocation of investments in different asset classes will vary over time as a result of market movements. The Trustee seeks to maintain a balance between maintaining the asset allocation in line with its benchmark and limiting the costs of rebalances. The Trustee reviews the asset allocation against the benchmark in the table below on a quarterly basis:

Portfolio	Asset Class	Allocation
Growth Portfolio	Target return funds	20
	Private market assets	14
Protection portfolio	Absolute Return Bond Fund	6
	Corporate Bonds	16
	Liability Driven Investment (LDI), including cash-like instruments	44
Total		**100**

Choosing investments

The Trustee has appointed the following investment managers to carry out the day-to-day investment of the Scheme:

- Legal & General Investment Management (LGIM)
- Schroders
- Ruffer
- Barings
- Alcentra
- Partners Group

The Trustee also has AVC contracts with the Prudential Assurance Company Limited, Utmost Life and Pensions Limited and MGM Assurance for the receipt of members' Additional Voluntary Contributions (AVCs).

The investment managers and AVC providers are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority.

The investment benchmarks and objectives for each investment manager are given below:

Investment manager	Fund	Benchmark	Objective
LGIM	Leveraged gilt & index-linked gilt portfolio	Leveraged & single stock gilts & index-linked gilts	Provide leveraged exposure to changes in interest rates & inflation
	Buy & Maintain Credit Funds	n/a	To capture the credit risk premium with a diversified portfolio of non-government bonds
	Absolute Return Bond Fund	ICE BofA Sterling 3-Month Deposit Offered Rate Constant Maturity Index	Outperform benchmark by +1.50% p.a. over rolling 3-year periods
	Sterling Liquidity Fund	SONIA	Provide capital stability, liquidity and diversification while providing a competitive level of return
Schroders	Diversified Growth Fund	ICE BofA Sterling 3-Month Government Bill Index + 4.5% (before fees)	Match the performance of the target over a market cycle (5-7 years)
Ruffer	Absolute Return Fund	Bank of England base rate	n/a
Barings	Global Special Situations Credit Fund 3	n/a	13 – 15% (net of fees). Achieve a combination of high capital appreciation and to a lesser degree current income by investing in stressed and distressed corporate debt instruments issued by

			companies in Europe and North America.
Alcentra	European Direct Lending (Levered) Fund III	n/a	10-12% (after all fees and carry). Generate attractive, risk adjusted returns by lending to Middle Market businesses operating predominantly in Europe with an enterprise value of up to €1bn.
Partners Group	Partners Group LIFE 2018 S.C.A., SICAV-RAIF	n/a	8-12% p.a. (after fees). Deliver attractive financial returns within a responsible investment framework.

The performance of the investment managers will be monitored as frequently as the Trustee considers appropriate in light of the prevailing circumstances. The monitoring takes into account both short-term and long-term performance.

The AVC arrangement is reviewed from time to time.

Fee agreements

The fee arrangements with the investment managers are summarised in the Trustee's Investment Manager Arrangement Summary document.

Investments and disinvestments

The Scheme is expected to have negative cashflow. The Scheme has invested in LGIM's Buy & Maintain Credit funds with the allocation designed so that it broadly provides, or matches, 50% of the Scheme's estimated cashflow requirement. Additional cashflow is provided by the Ruffer Absolute Return Fund and the three Private Markets funds, however the cashflow pattern from these funds is irregular. Should additional cashflow be required, disinvestments are to be made from the LGIM Sterling Liquidity Fund. The Sterling Liquidity Fund will retain a ring-fenced balance of £1m to meet additional cashflow requirements. Following a disinvestment for cashflow purposes from the Sterling Liquidity Fund, or where the required amount exceeds the ring-fenced balance, the Trustee will receive advice from its investment consultant on 'topping-up' the fund.

The Scheme is expected to receive capital calls from its Private Markets funds on an ad-hoc basis (requiring monies to be paid into the private market funds). These calls are to be met from the Sterling Liquidity Fund, which holds a ring-fenced balance in order to meet capital calls.

Where cash inflows are received, the Trustee will seek advice from the Scheme's investment consultant on how the monies should be invested to account for the Scheme's position at that time.

Collateral management on the LGIM LDI funds

The Scheme has entered into LGIM's Enhanced Service Agreement ("ESA"), which provides an integrated protection portfolio solution. Under this solution, LGIM are able to manage the entire protection portfolio (including LDI, Buy & Maintain Credit and collateral holdings) against agreed guidelines.

Under the ESA, LGIM have authority to invest in leveraged gilt & index-linked gilt funds. LGIM will actively manage the amount of leverage within the funds and will hold a level of collateral within the ESA in accordance with the agreed guidelines. Should the ESA require additional collateral, LGIM will automatically disinvest from the LGIM Absolute Return Bond Fund. In the event that cash collateral payouts are made from the ESA, LGIM will automatically pay these amounts directly into the Scheme's LGIM Absolute Return Bond Fund.