Cameron McKenna Final Salary Pension Scheme

Statement of Investment Principles

October 2026

1. Introduction

The Trustee of the Cameron McKenna Final Salary Pension Scheme has prepared this Statement of Investment Principles ('SIP') for the Scheme with effect from October 2026. It has been prepared in accordance with applicable legislation, taking into account guidance from The Pension Regulator and written advice from an independent investment adviser as required.

The purpose of the SIP is to set out Trustee's investment strategy in high level, including the investment objectives, investment strategy and other investment policies Trustee has adopted for any assets remaining in the Scheme following a full Scheme buy-in transaction with an insurer.

The Trustee must review the SIP in consultation with the Sponsoring Employer at least every three years; and without delay after any significant change in investment policy or circumstances of the Scheme. The Trustee last reviewed this SIP in October 2025.

2. Scheme governance

The Trustee is responsible for the governance of the Scheme's assets and the investment of these assets in the best interests of members and beneficiaries. The Trustee exercises its powers of investment in accordance with the Trust Deed and Rules of the Scheme and applicable law. Where the Trustee is required to make an investment decision, the Trustee must receive advice from the relevant advisers first. It believes that this ensures that it is appropriately familiar with the issues concerned.

The Trustee has delegated day-to-day investment of the Scheme's remaining assets to be undertaken through the fiduciary management service of Schroders Investment Solutions Limited ('**Schroders Solutions'**), hereafter referred to as the '**Fiduciary Manager'**. The Trustee is satisfied that the Fiduciary Manager has the appropriate knowledge and experience for managing the investments of the Scheme and they carry out their role in accordance with the criteria for investment set out in the Occupational Pension Schemes (Investment) Regulations 2005, the principles contained in this SIP and any applicable investment guidelines and restrictions agreed with the Trustee.

The Trustee acknowledges the potential for conflicts of interest as part of ongoing Fiduciary Management business activities. As an FCA regulated firm, the Fiduciary Manager is required to prevent or manage conflicts of interest. Where third party managers the Scheme invests in ("**the Underlying Managers**") are also regulated, they may be required to manage conflicts of interest as are applicable in their jurisdiction of incorporation or operations. The Fiduciary Manager monitors these conflicts as part of its regulatory filings (where applicable), and as part of ongoing review. The Fiduciary Manager's Conflict of Interest policy is available to be shared to the Trustee when required.

The Trustee considers that the governance structure is appropriate for the Scheme as it allows the Trustee to make the important decisions on investment policies, while delegating the day-to-day aspects to the Fiduciary Manager as appropriate.

3. Investment objectives and strategy

The primary objective of the Trustee of the Scheme with regard to investment policy is to meet the benefit payments promised to the Scheme's members as they fall due. In order to achieve this, in June 2025, the Trustee carried out a full-Scheme buy-in policy with Aviva. Under the terms of the contract, Aviva is committed to paying the retirement benefits due to all members and beneficiaries that were included in the contract. The Trustee remains responsible for the Scheme's remaining assets, which are managed by the Fiduciary Manager on a care and maintenance basis, delegated from the Trustee.

Given the Trustee no longer requires investment returns to meet any outstanding liabilities, the Trustee's objective is no longer framed with reference to a liability-related objective.

4. Monitoring

The Trustee monitors the Fiduciary Manager's management of the remaining assets against the agreed performance objectives.

The Trustee, or any other suitably qualified adviser on behalf of the Trustee, reviews the activities of the Fiduciary Manager to satisfy themselves that the Fiduciary Manager continues to carry out their work competently, exercises its powers of investment with a view to giving effect to the principles in this SIP and has the appropriate knowledge and experience to manage the assets of the Scheme.

5. Risk management

The Trustee recognises the risks involved in the investment of the remaining assets of the Scheme. The Trustee will keep these risks and how they are measured and managed under regular review. The main risks include, but not limited to:

– **ESG risk including Climate risk** – the risk of adverse performance due to ESG related factors including climate change. This is addressed by the Trustee's Risk Transfer adviser carrying out an ESG assessment at the point of buy-in policy provider at the point of transaction. In addition, for the remaining assets, the Fiduciary Manager also integrate ESG assessment at the point of investment with the Underlying Investment Managers as well as assessing them on an ongoing basis.

– **Insurer default/credit risk** – The risk of a default by the bulk annuity provider (buy-in insurer). The Trustee and its Risk Transfer Adviser considered the strength of the insurer before transacting the policy with the insurer whilst considering the wider regulatory framework within which they are required to operate.

6. Financially material investment considerations

Financial material considerations, which include (but not limited to) environmental, social and governance (ESG) considerations (including, but not limited to, climate change), which the Trustee considers to be financially material.

The Trustee believes that certain ESG factors can have an impact on financial performance and part of its fiduciary duty is to incorporate this information into its investment decisions to reduce investment risk and enhance portfolio returns over the length of time needed for the funding of future benefits of the Scheme. The Trustee expects the Fiduciary Manager to take financially material considerations into account, as appropriate, in the retention and realisation of remaining assets. Their relevance depends on the nature of the asset and the period for which it is expected to remain in the Scheme.

Given the nature of the Scheme's buy-in policy, the Trustee believes there is limited scope to influence the ongoing ESG related activities of the insurer hence the Trustee will not actively seek to monitor its activities and policies in relation to ESG-related financial material considerations. Should the Trustee be provided with any opportunity which it deems appropriate to engage its insurer, it will consider the ESG-related financial material considerations and will outline its views and expectations of the insurer. The Trustee considered ESG capabilities of the insurer as part of the tendering process which resulted in selecting Aviva as the buy-in provider. Trustee was comfortable with the insurer's approach and system in ESG-related aspect.

7. Non-financial material investment considerations

The Trustee does not at present take into account non-financial matters (such as members' ethical considerations, social and environmental impact matters or future quality of life considerations for members and beneficiaries) when making investment decisions as there is no likely common view on any ethical matters which members are likely to hold. At this time the Trustee has no plans to seek the views of the membership on ethical considerations.

8. Stewardship

The Trustee is responsible for developing its own stewardship policy which includes both voting (where applicable) and engagement. The Trustee believes proper stewardship will result in better management of financially material ESG and climate related risks and opportunities. This is expected to improve the long-term financial outcomes of the Scheme which ultimately is in the best interests of the Scheme's members and beneficiaries. The Trustee expects its Fiduciary Manager to be a signatory to the UK Stewardship Code.

The Trustee has received training on the Fiduciary Manager's approach to stewardship. The Fiduciary Manager has its own voting and engagement policies documented in its Engagement Blueprint which sets out six sustainability themes to prioritise and which guides the voting and engagement behaviours of the Fiduciary Manager. Therefore, to ensure focused voting and engagement with the Underlying Investment Managers, the Trustee, has chosen to align its stewardship priorities with those of the Fiduciary Manager: Climate Change, Natural Capital & Biodiversity and Human Rights. The Trustee expects the Fiduciary Manager to take their policy and stewardship priorities into account as part of its own stewardship activities and manager selection.

The Trustee expects the Fiduciary Manager to exercise any applicable investment rights and to undertake relevant engagement in accordance with its own policies, where appropriate for the Scheme's remaining assets. The Trustee reviews, monitors and challenges the Fiduciary Manager where necessary in relation to the voting and engagement activities of the Fiduciary Manager and the Underlying Investment Managers.

Given the nature of the Scheme's buy-in policy, the Trustee believes there is limited scope to influence the ongoing stewardship activities of the insurer hence the Trustee will not actively seek to monitor its activities and policies unless there is future opportunity for the Trustee to do so.