DWA Pension Scheme

Statement of Investment Principles

Contents

1 Introduction

This document constitutes the Statement of Investment Principles (SIP) for the **DWA Pension Scheme** ('the Scheme'). While the Scheme was not required to produce a SIP, it was decided that it would be good practice to produce one.

The SIP aims to support both current and prospective members by clearly outlining the Scheme's purpose and investment beliefs. It helps members understand the Scheme's offerings and explains the governance framework used to manage their investments.

The Administrator is L&G, who oversees the operational and regulatory management of the Scheme.

The Investment Manager is L&G, who executes the investment strategy and oversees the day-to-day management of the Scheme.

The Investment Adviser is Dean Wetton Advisory Limited, who provide strategic advice on the investments.

DWA Trustees Limited are Trustees for the Scheme.

The Scheme is regulated by the Financial Conduct Authority (FCA) and The Pensions Regulator (TPR).

The Scheme reviews this SIP annually or more frequently if there have been significant changes to the investment strategy, legislation, or the demographics of the Scheme's members.

1.1 Declaration

This version of the SIP was approved by the Trustees on 12th December 2025. The Trustees confirm that this SIP accurately reflects the investment strategy currently in place or intended for the Scheme. The Trustees recognise their responsibility to ensure that the Scheme's assets are invested in line with these principles, with support and guidance from the appointed advisers.

2 Investment Principles

2.1 Scheme Governance

The Trustees oversee the management and investment of the Scheme's assets on behalf of the members. The Trustees believe that the governance arrangements described in this SIP are suitable for the Scheme because they enable them to retain control over key investment decisions while delegating routine operational duties to the Investment Manager where appropriate. The duties of each of the parties involved in the Scheme's governance (the Trustees, Investment Manager, and Investment Adviser) are detailed later in the document.

The Trustees review the Scheme's assets on a regular basis to ensure that they are predominantly invested in regulated investments, with any exposure to unregulated investments kept at a cautious level.

The Trustees will monitor the blends on at least a quarterly basis, with a deeper assessment of the fund allocations at least annually, though they may adjust allocations at other times if they consider it appropriate.

2.2 Investment Objectives

The Scheme's main objective is to provide an investment framework that meets the requirements of its members.

2.3 Investment types

The Scheme offers three separate portfolios – a Growth portfolio, a Core portfolio, and a Protection portfolio. These portfolios have different asset allocations to provide varying levels of risk and reward to offer members a diverse range of options to cater for their needs as they vary throughout their lifetime.

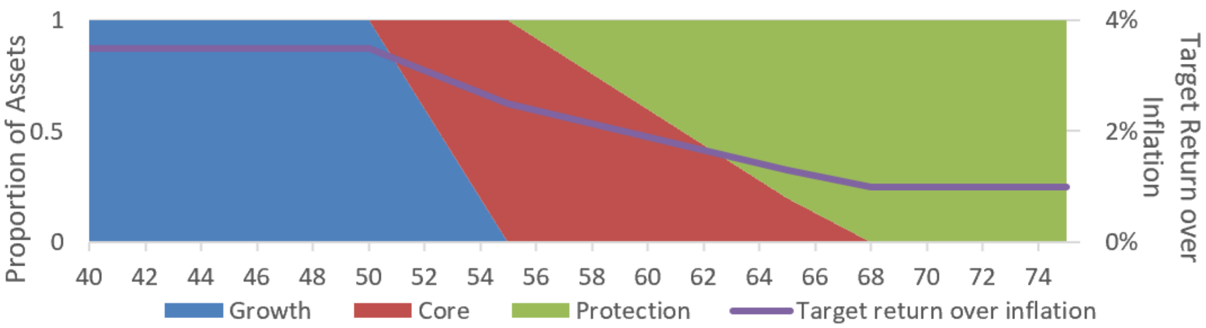
2.4 The Default Arrangement

The Scheme operates a single default investment approach that follows a diversified strategy throughout a member's working life. The default option progressively reduces investment risk over time by moving members through a series of multi-asset funds as they approach retirement. The simplicity of this structure aims to provide a straightforward and flexible investment pathway for members. Each fund within the strategy is managed to target a level of risk, and this is used to determine an indicative long-term return objective. This return is not guaranteed.

The table below shows the target return and risk level of each portfolio.

Strategy	Target Return	Target Risk Level
Growth	Inflation + 3.5%	95% of Equity Risk
Core	Inflation + 2.5%	2/3rd of Equity Risk
Protection	Inflation + 1%	1/3rd of Equity Risk

The glidepath below shows the fund allocation as a member ages.



The Trustees may adjust the underlying funds within the strategy. The strategic allocation on September 30th 2025, though the actual allocation may drift before rebalancing:

Asset Class / Fund name	Growth	Core	Protection
Equity	**89%**	**56%**	**15%**
Global Equity - *DB - World Equity Index*	42%	34%	0%
Future World All World - *GPGE*	32%	13%	15%
Future World UK Equity - *UPAK*	15%	9%	0%
Diversifiers	**8%**	**11%**	**15%**
REITS - *MD - Global Real Estate Equity Ind*	2%	3%	5%
Infrastructure - *MB - Global Infrastructure Equity Index*	1%	2%	3%
Private Equity - *MC - Global Listed Private Equity Passive Fund*	2%	1%	0%
EM local currency government bond - *XPAB - EM Passive Local Currency Government Bond*	1%	2%	3%
EM hedged debt - *XPAC - EM Passive USD Gov Bond*	2%	3%	4%
Bonds	**3%**	**33%**	**65%**
Corporate Bonds - *EB - Investment Grade Corporate Bond All Stocks Index*	0%	5%	10%
Future World Corporate Bonds - *CCAT*	0%	18%	18%
Long Gilts - *AF - Over 15y Gilts Index*	3%	0%	0%
Index Linked - *Y - All Stocks Index-Linked Gilts*	0%	10%	5%
Short Gilts - *BS - 0 to 5 Year Gilts Index*	0%	0%	32%
Cash	**0%**	**0%**	**5%**

*Totals may not sum to 100% due to rounding.

2.5 Self-Selects

At present the Trustees have not offered any self-select options. The Trustees will regularly reconsider this decision in order to best serve member interests.

2.6 Environmental, Social and Corporate Governance (ESG)

The Trustees consider ESG integration to be a valuable component of a long-term investment strategy, particularly in helping to manage risk. While recognising that ESG-focused investments may involve additional costs and resources, the Trustees believe these are outweighed by the potential benefits. The Trustees also remain mindful of regulatory developments that could significantly impact the risk profile of investments. ESG considerations will be applied where there is a clear case for enhancing member outcomes.

2.7 Stewardship & Voting Rights

The Trustees seek to ensure that the investment manager reflects its views on environmental, social, and governance (ESG) matters. This begins with the selection of managers whose ESG principles align with those of the Scheme. Ongoing engagement with L&G helps the Trustees monitor alignment on climate issues and ESG priorities, including the effective exercise of voting rights.

The Trustees believe that active engagement with companies held within the Scheme's investments, particularly through shareholder voting, can contribute to stronger long-term returns.

The Trustees expect the fund manager to prioritise members' interests. If investment performance falls short of expectations, the Trustees will consult the Investment Adviser to assess the situation and determine appropriate next steps regarding the suitability of the investments.

As the Scheme invests through pooled funds, the Trustees do not select individual securities or direct investment decisions at the stock level. Similarly, the Trustees do not engage directly with companies or instruct managers on specific engagements. Instead, it relies on selecting managers whose stewardship practices and ESG oversight are consistent with its own principles. These delegated responsibilities include monitoring capital structures, ESG risks (including climate-related risks), and portfolio turnover and associated costs.

To avoid conflicts of interest, the Trustees delegate engagement activities to the investment managers, including interactions with relevant stakeholders. With support from its Investment Adviser, the Trustees regularly reviews the manager to ensure they remain suitable for managing members' assets. Most investments are held in passive strategies, which further reduces the potential for conflicts of interest. While many responsibilities are delegated, the Trustees consider these factors during its ongoing review of the managers' performance and alignment with Scheme objectives.

2.8 Risks

The Trustee acknowledges that investing the Scheme's assets involves a range of risks and how they will be mitigated. While the following list outlines key risks considered, it is not exhaustive.

i. The risk of not achieving the investment objectives. The Trustees mitigate this through regular monitoring of investment performance.

ii. The risk of underperformance. Fund performance is reviewed regularly relative to comparators, and changes may be considered if necessary.

iii. The risk of insufficient diversification. This is managed through the Scheme's asset allocation strategy.

iv. The possibility of holding assets that cannot be easily sold when required. This is addressed by investing in pooled funds.

v. The risk that investments may cause undue harm to the environment. This is managed through engagement with investment managers and through climate-related disclosures.

vi. The potential impact of political or country-specific events on investment values. Diversification across regions helps reduce this exposure.

The Trustee remains committed to regularly reviewing all risks and ensuring appropriate controls are in place to protect members' interests.

2.9 Division of Responsibilities

The **Trustees** will be responsible for, amongst other things:

i. Deciding the Scheme’s investment objectives and reviewing these when necessary.
ii. Producing an investment strategy to meet the investment objectives.
iii. Reviewing the suitability of the investment policy for members following the results of each investment review.
iv. Monitoring compliance of the investment arrangements with this SIP on a regular basis.
v. Reviewing the quality of the Investment Manager’s performance and appoint or dismissing the Investment Manager’s if it is deemed appropriate.
vi. Monitoring any changes in the Scheme's Investment Managers that could affect the interests of the Scheme.
vii. Monitoring any changes within the Scheme's membership and considering how that may affect the way the assets should be invested.
viii. Ensuring all regulatory requirements are met.

The **Investment Manager** will be responsible for, amongst other things:

i. Within the guidelines that have been set out by the Trustees, executing changes in the asset holdings and selecting and undertaking transactions in specific investments within each asset class.
ii. Providing the Trustees with sufficient information each quarter to facilitate the review of their activities.
iii. Informing the Trustee immediately of:
    - Any serious breach of internal operating procedures.
    - Any material changes in the knowledge and experience of those involved in managing the Scheme's investments.
    - Any breach of investment restrictions agreed between the Trustees and the Investment Manager.

The **Investment Adviser** will be responsible for, amongst other things:

i. Advising the Trustees how any changes within the Scheme's membership may affect the way the assets should be invested.
ii. Advising the Trustees of any changes in the Scheme's Investment Managers that could affect the interests of the Scheme.
iii. Providing industry data for comparison purposes with the funds currently held.
iv. Undertaking reviews of the Scheme's investment arrangements including reviews of the asset allocation policy and current Investment Manager, and selection of new managers/custodians/performance measurers, as appropriate.
v. Assisting the Trustee in fulfilling their regulatory reporting requirements, including collecting and collating data from the Investment Managers.

3 Governance and operational framework

3.1 Monitoring

The Trustees are responsible for regularly monitoring the suitability and performance of the default arrangement and the other investment options available to members.

3.2 Funds

The Trustees monitor the performance of the funds available to members, considering both return and risk, against the relevant performance objectives. Performance is assessed net of all charges, including transaction costs, to ensure that we can determine whether each fund is meeting its objectives after allowing for explicit costs. This helps the Trustees confirm that the funds remain suitable to deliver their intended return or risk management outcomes.

Fund performance is reviewed on at least a quarterly basis using data provided by the underlying investment managers, with a more detailed review of each investment option carried out annually.

3.3 Conflicts of interest

In the event of a conflict of interest, we ensure that contributions are invested in the sole interests of members and beneficiaries.

4 Review Record

This document is reviewed on behalf of the Trustee at least annually. The following table records changes to this document:

Revision Date	Version	Stage	Comments	Reviewer	Approval Date
Nov 25	V1	Creation	Initial Draft	Trustee	
Apr 26	V2	Formal Adoption		Trustee	Apr 26