

Statement of Investment Principles for the Mott MacDonald Pension Scheme

15 September 2021

Page 1 of 15

1. Introduction

This Statement of Investment Principles (“SIP”) sets out the policy of the Trustees of the Mott MacDonald Pension Scheme (“the Trustees”) on various matters governing decisions about the investments of the Mott MacDonald Pension Scheme (“the Scheme”), a Defined Benefit (“DB”) Scheme. This SIP replaces the previous SIP dated December 2020.

The SIP is designed to meet the requirements of Section 35 (as amended) of the Pensions Act 1995 (“the Act”), the Occupational Pension Schemes (Investment) Regulations 2005 and the Pension Regulator’s guidance for defined benefit pension schemes (March 2017). The SIP also reflects the Trustees’ response to the Myners voluntary code of investment principles. The Scheme’s assets are held in trust by the Trustees. The investment powers of the Trustees are set out in Section 4 of Schedule 2, in the Scheme’s Eleventh Definitive Trust Deed, dated 29th November 2013.

This SIP has been prepared after obtaining and considering written professional advice from LCP, the Scheme’s investment adviser, whom the Trustees believe to be suitably qualified and experienced to provide such advice. The advice takes into account the suitability of investments including the need for diversification given the circumstances of the Scheme and the principles contained in this SIP. The Trustees have consulted with Mott MacDonald Group Limited (“the Employer”) in producing this SIP, and advice has been taken that the investments of the Scheme are compliant with the Trust Deed and Rules of the Scheme.

The Trustees will review this SIP from time to time and, with the help of their advisers, will amend it as appropriate. These reviews will take place as soon as practicable after any significant change in investment policy and at least once every three years.

- **Appendix 1** sets out details of the Scheme’s investment governance structure, including the key responsibilities of the Trustees, investment advisers and investment managers. It also contains a description of the basis of remuneration of the investment adviser and the investment managers.
- **Appendix 2** sets out the Trustees’ policy towards risk appetite, capacity, measurement and management.
- **Appendix 3** sets out the Scheme’s investment manager arrangements.

2. Investment objectives

The primary objective is to ensure that the Scheme should be able to meet benefit payments as they fall due. In addition to this primary objective, the Trustees have a series of additional objectives. These are as follows:

- to broadly maintain the level of estimated expected long-term return at about 0.8% pa above gilts for the Scheme assets in aggregate based on LCP’s model as at 30 June 2021 so as to maintain the funding expectations in relation to the Scheme.

- that the Scheme's funding ratio (ie the value of its assets relative to the assessed value of its liabilities) should remain at an appropriate level. The Trustees are aware that there are various measures of funding, and have given due weight to those considered most relevant to the Scheme. In particular, the Trustees have taken into account the funding requirements detailed in the Occupational Pensions Scheme (Scheme Funding) Regulations 2005.
- to maximise the return on the investments subject to achieving the other objectives and to match or exceed the long-term return assumptions made by the Scheme Actuary in the valuation.
- to balance the risk level of the portfolio with the security of the Sponsor's covenant.

3. Investment strategy

The Trustees, with the help of their advisers and in consultation with the Employer, reviewed the investment strategy in August 2021, taking into account the objectives described in Section 2 above.

The result of the review was that the Trustees agreed that the investment strategy of the Scheme should be based on the allocation below.

Asset class	Strategic allocation
Private credit and diversified growth funds	10%
Liability-driven investment and synthetic equity portfolio ("LDI portfolio")	<u>90%</u>
Total	<u>100%</u>

The equity exposure within the LDI portfolio is designed to be equivalent to 5% of the total Scheme assets. The LDI portfolio is designed to hedge around 95% of the Scheme's interest rate and inflation risk on a technical provisions basis.

The Trustees have agreed to monitor the allocation of the Scheme's assets on a quarterly basis. If the allocation for any asset class moves more than 3% away from the benchmark allocation in the above table (either overweight or underweight), the Trustees will consider whether any rebalancing should be carried out.

4. Considerations in setting the investment arrangements

When deciding how to invest the Scheme's assets, the Trustees consider a number of risks, including, but not limited to, those set out in Appendix 2. Some of these risks are more quantifiable than others, but the Trustees have tried to allow for the relative importance and magnitude of each risk.

The Trustees considered a wide range of asset classes for investment, taking account of the expected returns and key individual risks associated with those asset classes as well as how these risks can be mitigated where appropriate. The key financial assumption made by the Trustees in determining the investment arrangements is that equity-type investments will, over the long term, outperform gilts by 4.8% pa. The other key assumptions for expected returns above gilts are as follows:

- average long-term return on private credit: 3.8% pa
- average long-term return on diversified growth funds: 2.9% pa

The expected return assumptions are geometric average long-term annual figures. The assumptions are intended to be best estimates; this means for each assumption there should be a 50/50 chance that the observed value will be either higher, or lower, than assumed. The return assumptions have been reduced to allow for the typical investment management fees required to invest in each asset class.

In setting the strategy the Trustees took into account:

- the Scheme's investment objectives, including the target return required to meet the Trustees' investment objectives;
- the Scheme's cash flow requirements in order to meet benefit payments in the near to medium term;
- the best interests of all members and beneficiaries;
- the circumstances of the Scheme, including the profile of the benefit cash flows (and the ability to meet these in the near to medium term), the funding level, and the strength of the Employer covenant;
- the risks, rewards and suitability of a number of possible asset classes and investment strategies and whether the return expected for taking any given investment risk is considered sufficient given the risk being taken;
- the need for appropriate diversification between different asset classes to ensure that both the Scheme's overall level of investment risk and the balance of individual asset risks are appropriate;
- any other considerations which the Trustees consider financially material over the time horizon that the Trustees consider is needed for the funding of future benefits by the investments of the Scheme; and
- the Trustees' investment beliefs about how investment markets work and which factors are most likely to impact investment outcomes.

Some of the Trustees' key investment beliefs are set out below.

- asset allocation is the primary driver of long-term returns;
- risk-taking is necessary to achieve return, but not all risks are rewarded;
- equity, credit and illiquidity are the primary rewarded risks;
- risks that are typically not rewarded, such as interest rate, inflation and currency, should generally be avoided, hedged or diversified;
- investment markets are not always efficient and there may be opportunities for good active managers to add value;
- environmental, social and governance ("ESG") factors may be one area of market inefficiency and so managers may be able to improve risk-adjusted returns by taking account of ESG factors;

- investment managers who can consistently spot and profitably exploit market opportunities are difficult to find and therefore passive¹ management, where available, is usually better value;
- long-term environmental, social and economic sustainability is one factor that trustees should consider when making investment decisions;
- responsible investment in well governed companies and engaging as long-term owners can reduce risk over time and may positively impact Scheme returns; and
- costs have a significant impact on long-term performance.

5. Implementation of the investment arrangements

Before investing in any manner, the Trustees obtain and consider proper written advice from their investment adviser on the question of whether the investment is satisfactory, having regard to the need for suitable and appropriately diversified investments.

Details of the investment managers are set out in Appendix 3.

The Trustees have signed agreements with the investment managers setting out in detail the terms on which the portfolios are to be managed. The investment managers' primary role is the day-to-day investment management of the Scheme's investments.

The Trustees and investment managers to whom discretion has been delegated exercise their powers to giving effect to the principles in this Statement of Investment Principles, so far as is reasonably practicable.

The Trustees have limited influence over managers' investment practices where the Scheme's assets are held in pooled funds, but they encourage their managers to improve their practices where appropriate. The Trustees instruct BMO, which manages a bespoke LDI and synthetic equity portfolio for the Scheme, to tailor its investment practices such that they align with the Scheme's investment strategy and objectives.

The Trustees' view is that the fees paid to the investment managers, and the possibility of their mandate being terminated, ensure they are incentivised to provide a high quality service that meets the stated objectives, guidelines and restrictions of the fund. However, in practice managers of pooled funds cannot fully align their strategy and decisions to the (potentially conflicting) policies of all their pooled fund investors in relation to strategy, long-term performance of debt/equity issuers, engagement and portfolio turnover.

The Trustees evaluate investment manager performance by considering performance over both shorter and longer-term periods as available. Except in closed-ended funds where the duration of the investment is determined by the fund's terms, the duration of a manager's appointment will depend on strategic considerations and the outlook for future performance. Generally, the Trustees would be unlikely to terminate a mandate on short-term performance grounds alone.

The Trustees' policy is to evaluate each of their investment managers by reference to the manager's individual performance as well the role it plays in helping the Scheme meet its

¹ Passive management includes a range of rules-based portfolio construction strategies

overall long-term objectives, taking account of risk, the need for diversification and liquidity. Each manager's remuneration, and the value for money it provides, is assessed in light of these considerations.

The Trustees recognise that portfolio turnover and associated transaction costs are a necessary part of investment management and that the impact of portfolio turnover costs is reflected in performance figures provided by the investment managers. The Trustees expect their investment consultant to incorporate portfolio turnover and resulting transaction costs as appropriate in its advice on the Scheme's investment mandates.

6. Realisation of investments

The investment managers have discretion over the timing of realisation of investments of the Scheme within the portfolios that they manage, and in considerations relating to the liquidity of investments.

When appropriate, the Trustees, on the administrators' recommendation, decide on the amount of cash required for benefit payments and other outgoings and inform the investment managers of any liquidity requirements. The Trustees' preference is for investments that are readily realisable, but recognise that achieving a well-diversified portfolio may mean holding some investments that are less liquid (eg private credit). In general, the Trustees' policy is to use cash flows to rebalance the Scheme's assets towards the strategic asset allocation, and also receive income from some of the portfolios where appropriate.

7. Consideration of financially material and non-financial matters

The Trustees have considered how environmental, social, governance ("ESG") and ethical factors should be taken into account in the selection, retention and realisation of investments since they recognise that these factors can be relevant to investment performance.

The Trustees expect their investment managers to take account of financially material considerations (including climate change and other ESG considerations). The Trustees seek to appoint managers that have appropriate skills and processes to do this, and from time to time review how their managers are taking account of these issues in practice.

The Trustees have limited influence over managers' investment practices where assets are held in pooled funds, but they encourage their managers to improve their practices where appropriate.

8. Stewardship

The Trustees recognise their responsibilities as owners of capital, and believe that good stewardship practices, including monitoring and engaging with investee companies, and exercising voting rights attaching to investments, protect and enhance the long-term value of investments. The Trustees have delegated to their investment managers the exercise of rights attaching to investments, including voting rights, and engagement with issuers of debt and equity and other relevant persons about relevant matters such as performance, strategy, capital structure, management of actual or potential conflicts of interest, risks and ESG considerations.

The Trustees do not monitor or engage directly with issuers or other holders of debt or equity. They expect the investment managers to exercise ownership rights and undertake monitoring and engagement in line with the managers' general policies on stewardship, as provided to the Trustees from time to time, taking into account the long-term financial interests of the beneficiaries. The Trustees seek to appoint managers that have strong stewardship policies and processes, reflecting where relevant the recommendations of the UK Stewardship Code issued by the Financial Reporting Council, and from time to time the Trustees review how these are implemented in practice.

Investment governance, responsibilities, decision-making and fees

Appendix 1

Page 7 of 15

The Trustees have decided on the following division of responsibilities and decision-making for the Scheme. This division is based upon the Trustees' understanding of the various legal requirements placed upon them, and their view that the division of responsibility allows for efficient operation and governance of the Scheme overall. The Trustees' investment powers are set out within the Scheme's governing documentation.

Trustees

In broad terms, the Trustees are responsible in respect of investment matters for:

- setting the investment strategy, in consultation with the Employer;
- developing a mutual understanding of investment and risk issues with the Employer;
- reviewing the investment policy as part of any review of the investment strategy;
- formulating a policy in relation to financially material considerations, such as those relating to ESG considerations (including but not limited to climate change);
- formulating a policy on taking account of non-financial matters in the selection, retention and realisation of investments;
- setting the policy for rebalancing between asset classes;
- setting a policy on the exercise of rights (including voting rights) and undertaking engagement activities in respect of the investments;
- appointing, monitoring, reviewing and dismissing investment managers, investment advisers, actuary and other service providers;
- monitoring the exercise of the investment powers that they have delegated to the investment managers and monitoring compliance with Section 36 of the Act;
- communicating with members as appropriate on investment matters, such as the Trustees' assessment of their effectiveness as a decision-making body, the policies regarding responsible investment and how such responsibilities have been discharged;
- putting effective governance arrangements in place and documenting these arrangements in a suitable form;
- reviewing the content of this SIP from time to time and modifying it if deemed appropriate; and
- consulting with the Employer when reviewing the SIP.

Investment managers

In broad terms, the investment managers will be responsible for:

Page 8 of 15

- managing the portfolios of assets according to their stated objectives, and within the guidelines and restrictions set out in their respective investment manager agreements and/or other relevant governing documentation.
- taking account of financially material considerations (including climate change and other ESG considerations) as appropriate when managing the portfolios of assets;
- exercising rights (including voting rights) attaching to investments and undertaking engagement activities in respect of investments;
- providing the Trustees with regular information concerning the management and performance of their respective portfolios; and
- having regard to the provisions of Section 36 of the Act insofar as it is necessary to do so.

The custodians of the portfolios (whether there is a direct relationship between the custodian and the Trustees or not) are responsible for safe keeping of the assets and facilitating all transactions within the portfolios.

Investment adviser

In broad terms, the investment adviser will be responsible, in respect of investment matters, as requested by the Trustees, for:

- advising on how material changes within the Scheme's benefits, membership, and funding position may affect the manner in which the assets should be invested and the asset allocation policy;
- advising on the selection, and review, of the investment managers, incorporating its assessment of the nature and effectiveness of the managers' approaches to financially material considerations (including climate change and other ESG considerations); and
- participating with the Trustees in reviews of this SIP.

Fee structures

The Trustees recognise that the provision of investment management and advisory services to the Scheme results in a range of charges to be met, directly or indirectly, by deduction from the Scheme's assets.

The Trustees have agreed Terms of Business with the Scheme's investment advisers, under which work undertaken is charged for by an agreed fixed fee or on a "time-cost" basis.

The investment managers receive fees calculated by reference to the market value of assets under management and also in some cases a performance related fee. The fee rates are believed to be consistent with the managers' general terms for institutional

clients and are considered by the Trustees to be reasonable when compared with those of other similar providers.

Page 9 of 15

The fee structure used in each case has been selected with regard to existing custom and practice, and the Trustees' view as to the most appropriate arrangements for the Scheme. However, the Trustees will consider revising any given structure if and when it is considered appropriate to do so.

Performance assessment

The Trustees are satisfied, taking into account the external expertise available, that there are sufficient resources to support their investment responsibilities. The Trustees believe that they have sufficient expertise and appropriate training to carry out their role effectively.

It is the Trustees' policy to assess the performance of the Scheme's investments, investment providers and professional advisers from time to time. The Trustees will also periodically assess the effectiveness of their decision-making and investment governance processes and will decide how this may then be reported to members.

Working with the Scheme's Employer

When reviewing matters regarding the Scheme's investment arrangements, such as the SIP, the Trustees seek to give due consideration to the Employer's perspective. While the requirement to consult does not mean that the Trustees need to reach agreement with the Employer, the Trustees believe that better outcomes will generally be achieved if the Trustees and Employer work together collaboratively.

1. Risk appetite and risk capacity

Risk appetite is a measure of how much risk the Trustees' are willing to bear within the Scheme in order to meet their investment objectives. Taking more risk is expected to mean that those objectives can be achieved more quickly, but it also means that there is a greater likelihood that the objectives are missed, in the absence of remedial action. Risk capacity is a measure of the extent to which the Trustees can tolerate deviation from their long term objectives before attainment of those objectives is seriously impaired. The Trustees aim is to strike the right balance between risk appetite and risk capacity.

When assessing the risk appetite and risk capacity, the Trustees considered a range of qualitative and quantitative factors, including:

- the strength of the Employer's covenant and how this may change in the near/medium future;
- the agreed journey plan and Employer contributions;
- the Scheme's long-term and shorter-term funding targets;
- the Scheme's liability profile, its interest rate and inflation sensitivities, and the extent to which these are hedged;
- the Scheme's cash flow and target return requirements; and
- the level of expected return and expected level of risk (as measured by Value at Risk ("VaR")), now and as the strategy evolves.

Following implementation of the Scheme's current investment strategy, based on LCP's model as at 30 June 2021, the Scheme's 1 year 95% Value at Risk was expected to be £23m. This means that there is a 1 in 20 chance that the Scheme's funding position will worsen by £23m or more over a one year period. When deciding on the current investment strategy, the Trustees believed this level of risk to be appropriate given the Trustee's and Employer's risk appetite and capacity, given the Scheme's objectives.

2. Approach to managing and monitoring investment risks

The Trustees consider that there are a number of different types of investment risk that are important to manage and monitor. These include, but are not limited to:

2.1. Risk of inadequate returns

A key objective of the Trustees is that, over the long-term, the Scheme should generate its target return so that it has adequate assets to meet its liabilities as they fall due. The Trustees therefore invest the assets of the Scheme to produce a sufficient long-term return in excess of the liabilities. There is also a risk that the performance of the Scheme's assets and liabilities diverges in certain financial and economic conditions in the short term. This risk has been taken into account in setting the investment strategy and is monitored by the Trustees on a regular basis.

Page 11 of 15 **2.2. Risk from lack of diversification**

This is the risk that failure of a particular investment, or the general poor performance of a given investment type, could materially adversely affect the Scheme's assets. The Trustees believe that the Scheme's assets are adequately diversified between different asset classes and within each asset class. This was a key consideration when determining the Scheme's investment arrangements and is monitored by the Trustee on a regular basis.

2.3. Investment manager risk

This is the risk that an investment manager fails to meet its investment objectives. Prior to appointing an investment manager, the Trustees receive written advice from a suitably qualified individual, and will typically undertake an investment manager selection exercise. The Trustees monitor the investment managers on a regular basis to ensure they remain appropriate for their selected mandates.

2.4. Liquidity/marketability risk

This is the risk that the Scheme is unable to realise assets to meet benefit cash flows as they fall due, or that the Scheme will become a forced seller of assets in order to meet benefit payments. The Trustees are aware of the Scheme's cash flow requirements and believe that this risk is managed by maintaining an appropriate degree of liquidity across the Scheme's investments and by investing in income generating assets, where appropriate.

2.5. Environmental, social and governance (ESG) risks

Environmental, social and corporate governance (ESG) factors are sources of risk to the Scheme's investments, some of which could be financially significant, over both the short and longer term. These potentially include risks relating to factors such as climate change, unsustainable business practices, and unsound corporate governance. The Trustees seek to appoint investment managers who will manage these risks appropriately on their behalf and from time to time review how these risks are being managed in practice.

2.6. Collateral adequacy risk

The Scheme is invested in leveraged Liability Driven Investment ("LDI") arrangements to provide protection ("hedging") against adverse changes in interest rates and inflation expectations. The LDI manager may from time to time call for additional cash to be paid to the LDI portfolio in order to support a given level of leverage. Collateral adequacy risk is the risk that the Trustees when requested to do so will not be able to post additional cash to the LDI fund within the required timeframe. A potential consequence of this risk is that the Scheme's interest rate and inflation hedging could be reduced and that the Scheme's funding level could suffer subsequently as a result. In order to manage this risk, the Trustees ensure that the Scheme has a sufficient

allocation to cash and other highly liquid assets which can be readily realised, so that cash can be posted to the LDI manager at short notice.

2.7. Credit and counterparty risk

This is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation.

The Scheme invests in pooled investment vehicles and is therefore directly exposed to credit risk of the pooled investment vehicles and is indirectly exposed to credit risks arising on the financial instruments held by the pooled investment vehicles. The Scheme is also subject to credit risk because the Scheme directly invests in bonds through the segregated portfolio with Ruffer and equity derivatives within the LDI portfolio managed by BMO.

Credit risk arising on bonds held directly and through the underlying investments of the pooled funds is mitigated through the risk limits that the investment managers are subject to. The majority of this exposure is to government bonds, where the credit risk is minimal, or investment grade corporate bonds.

Credit Counterparty risk arising on the equity derivatives held within the LDI portfolio managed by BMO is mitigated by these instruments being collateralised.

Direct credit risk arising from pooled investment vehicles is mitigated by the underlying assets of the pooled arrangements being ring-fenced from the pooled manager, the regulatory environments in which the pooled managers operate and diversification of investments amongst a number of pooled arrangements. The Trustees carry out due diligence checks on the appointment of new pooled investment managers and on an ongoing basis monitor any changes to the operating environment of the pooled manager.

Cash is held within financial institutions which are at least investment grade credit rated.

2.8. Currency risk

The Scheme manages this exposure through the risk limits that the funds are managed to. Each of the Scheme's portfolios are managed relative to Sterling benchmarks and the Trustees monitor the performance of these managers relative to these benchmarks on a regular basis. Whilst the Trustees do not have a specific benchmark limit on the exposure to overseas currency, they believe that this policy is reasonable.

After allowing for the currency hedging done by the Scheme's managers, the Scheme's current investment strategy has around 2% exposure to foreign currencies.

Page 13 of 15 **2.9. Interest rate and inflation risk**

The Scheme's assets are subject to interest rate and inflation risk because some of the Scheme's assets are held in bonds and a liability-driven investment mandate. However, the interest rate and inflation exposure of the Scheme's assets hedges part of the corresponding risks associated with the Scheme's liabilities.

The Trustees consider interest rate and inflation risks to be generally unrewarded investment risks.

As a result, the Trustees aim to hedge around 95% of the Scheme's exposure to interest rate and inflation risk, by investing in a mixture of bonds as well as leveraged LDI arrangements managed by BMO.

The net effect of the Trustees' approach to interest and inflation risk will be to reduce the volatility of the funding level, and so the Trustees believe that it is appropriate to manage exposures to these risks in this manner and to review them on a regular basis.

2.10. Other non-investment risks

The Trustees recognise that there are other, non-investment, risks faced by the Scheme, and takes these into consideration as far as practical in setting the Scheme's investment arrangements as part of their assessment of the other aspects of the Scheme's Integrated Risk Management framework.

Examples include:

- longevity risk (the risk that members live, on average, longer than expected); and
- sponsor covenant risk (the risk that, for whatever reason, the sponsoring Employer is unable to support the Scheme as anticipated).

Together, the investment and non-investment risks give rise generally to funding risk. This is the risk that the Scheme's funding position falls below what is considered an appropriate level. The Trustees regularly review progress towards the Scheme's funding target, both in the longer-term as well as against short-term milestones, comparing the actual versus the expected funding level.

By understanding, considering and monitoring the key risks that contribute to funding risk, the Trustees believe that they have appropriately addressed and are positioned to manage this general risk.

Investment manager arrangements

Appendix 3

Page 14 of 15

Details of the investment managers, their objectives, and investment guidelines are set out below.

1. BMO – liability-driven investment and synthetic equity portfolio (“LDI portfolio”)

The Trustees have selected BMO Global Asset Management (“BMO”) as the investment manager for the Scheme’s LDI portfolio (90% of total assets). The portfolio is invested in a range of hedging assets (such as interest rate swaps and gilts), with the aim of providing a hedge against a portion of the Scheme’s nominal and real rate liabilities. The portfolio also invests in a range of equity derivatives with the aim of providing equity exposure equal to around 5% of total Scheme assets. The LDI portfolio is priced daily, is open-ended and is unlisted.

2. Ruffer – diversified growth fund

The Trustees have selected Ruffer LLP (“Ruffer”) as the investment manager for approximately half of the Scheme’s diversified growth allocation. This mandate is implemented through a segregated portfolio of assets. Ruffer’s overall objective is firstly to preserve capital over rolling twelve month periods, and secondly to grow the portfolio at a higher rate (after fees) than could reasonably be expected from the alternative of depositing the cash value of the portfolio in a reputable United Kingdom bank.

3. Baillie Gifford – diversified growth fund

The Trustees have entered into a Trustee Investment Policy with Baillie Gifford Limited (“Baillie Gifford”) for approximately half of the Scheme’s diversified growth allocation. Baillie Gifford’s investment objective is to outperform the UK Bank of England base rate by at least 3.5% pa (after fees) over rolling five-year periods with annual volatility of less than 10%. The Fund is priced daily. The Fund is open-ended and is unlisted.

4. Hayfin – private credit

The Trustees have selected Hayfin Capital Management (“Hayfin”) as an investment manager for part of the Scheme’s private credit allocation. Hayfin’s investment objective for this fund (the Direct Lending Fund II) is to achieve a return of 8-10% pa gross of fees including a cash yield of 5.5% pa. The Trustees originally made a £20m commitment to the fund, although the actual allocation is now less than this, as the fund is in the process of returning drawn capital (and investment returns) to investors.

5. M&G – private credit

The Trustees have selected M&G Investments (“M&G”) as an investment manager for part of the Scheme’s private credit allocation. M&G’s investment objective for this fund

Lane Clark & Peacock LLP is a limited liability partnership registered in England and Wales with registered number OC301436. LCP is a registered trademark in the UK (Regd. TM No 2315442) and in the EU (Regd. TM No 002935583). All partners are members of Lane Clark & Peacock LLP.

A list of members’ names is available for inspection at 95 Wigmore Street, London, W1U 1DQ, the firm’s principal place of business and registered office. The firm is regulated by the Institute and Faculty of Actuaries in respect of a range of investment business activities. Locations in London, Winchester, Ireland and - operating under licence - the Netherlands.

(the Illiquid Credit Opportunities Fund II) is to achieve a return of cash +5-6% pa net of fees including a cash yield of 3-4% semi-annually.

Page 15 of 15

6. Additional Voluntary Contributions (“AVCs”)

There is a range of historic AVC holdings as follows:

- Utmost – a range of unit-linked funds
- Standard Life – a range of unit-linked funds
- Standard Life – With Profits Policy
- Prudential – With Profits Policy.

The Trustees operate their own bank account for cash management purposes.