# Servier Laboratories Limited Pension Fund (the "Fund")

# Statement of Investment Principles (the "Statement")

## Scope of Statement

This Statement has been prepared in accordance with Section 35 of the Pensions Act 1995 (as amended by the Pensions Act 2004, and the Occupational Pension Schemes (Investment) Regulations 2005) and the Occupational Pension Schemes (Charges and Governance) Regulations 2015. The Statement is intended to affirm the investment principles that govern decisions about the Fund's investments. A separate document, the Investment Policy Implementation Document ("IPID"), detailing the specifics of the Fund's investment arrangements, is also available to members upon request.

The effective date of this Statement is 31 March 2023. The Trustees will review this Statement and the Fund's investment strategy no later than three years after the effective date of this Statement and as soon as practicably possible after any significant change in investment policy.

The Fund comprises two sections: the Defined Contribution Section (which includes those Defined Contribution members with a Guaranteed Minimum Pension (GMP) underpin) and the Defined Benefits Section. There is no cross subsidy between the two sections. This Statement covers both the Defined Benefit Section and the Defined Contribution Section.

#### **Consultations Made**

The Trustees have consulted with the principal employer, Servier Laboratories Limited, the sponsor of the Fund, prior to writing this Statement and have taken the principal employer's comments into account as appropriate.

The Trustees predominantly deal with Aon Investments Limited ("AIL") on a regular basis for the Defined Benefit and Defined Contribution Section of the Fund. AlL is authorised and regulated by the Financial Conduct Authority and offers a number of services and the two key services of AIL which the Trustees employ are as below:

- The Regulated Investment Business Services, providing investment advice and operational support; and,
- The Delegated Investment Services, providing fiduciary investment management.

These areas are serviced by two separate teams at AIL.

The Trustees are responsible for the investment strategy of the Fund and have obtained written independent professional advice on the appropriate investment strategy and on the preparation of this Statement. This advice was provided by the Regulated Investment Business Service of AIL as the Trustees' appointed professional investment adviser (the "adviser").

The Trustees have decided to implement the Defined Contribution Section's investment strategy through Aon's Delegated DC Services. Under this approach, the Trustees delegate the selection of the platform provider and day-to-day management of the funds to the Delegated Investment Services business of AIL (the "Fiduciary Manager"). The available fund range includes a number of white-labelled

blended funds. The choice of underlying managers and structure of each blended fund is delegated to the Fiduciary Manager.

The day-to-day management of the Fund's assets within the Defined Benefit Section has also been delegated to the Fiduciary Manager.

A copy of this Statement is available to the members of the Fund and will be published on a publicly accessible website.

## 1 – Defined Contribution Section

## 1.1 Objectives and policy for securing objectives

The Defined Contribution Section of the Fund is open to new members.

The Trustees' investment objective is to make available a range of pooled investment funds which serve to meet the varying investment needs and risk tolerance of the Fund's members. In particular, the Trustees aim to provide investment options that allow members:

- To maximise the value of their assets at retirement;
- To maintain the purchasing power of their savings in real (i.e. post-inflation) terms; and
- To provide protection for accumulated assets in the years approaching retirement against:
  - Sudden (downward) volatility in the capital value
  - Fluctuations in the cost of securing an income and / or cash in retirement.

## 1.2 Investment Policy

The investment policy falls into two parts:

- The strategic management, the setting of which is one of the fundamental responsibilities of Trustees; and
- The day-to-day management of the assets, which has been delegated to the Fiduciary Manager.

#### 1.2.1 Strategic management

Three distinct asset allocation strategies are offered to members, which target different benefits at retirement, namely drawdown, annuity purchase and cash. These asset allocation strategies are offered through a target date fund structure, namely the Aon Managed Retirement Pathway Fund series, managed by the Fiduciary Manager. Details of the three asset allocation strategies are provided in the IPID.

For members who do not wish to make an active decision regarding the investment of their assets, a Default Option has been put in place following consideration of the Fund membership, the risks associated with investment and after taking advice from its adviser. Furthermore, as the Fund is being used for auto-enrolment purposes, the Trustees are required to designate a default arrangement into which members are invested.

The Default Option that applies is the Aon Managed Retirement Pathway Fund series, which targets drawdown at retirement.

Each member is allocated to the relevant Retirement Pathway Fund with a target date that most closely matches their selected retirement date. The switching of assets between the different underlying funds used within each asset allocation strategy is carried out within each target date fund.

Each asset allocation strategy aims to provide members with the potential for higher levels of growth during the accumulation of their retirement savings through exposure to growth assets including equities. Following the accumulation phase, each asset allocation strategy gradually diversifies their

investments in the years approaching retirement to reduce volatility and to provide a broad base of assets from which members can choose the type of benefits they wish to take.

In setting the three asset allocation strategies, the Trustees have reviewed the extent to which the return on investments (after deduction of any charges relation to those investments) is consistent with the objectives of the strategy, which is broadly to provide an appropriate risk/return profile given the needs of members. The Trustees have also considered analysis of the existing membership of the DC Section, including considerations of factors such as age, accumulated fund values and term to retirement.

The Trustees will regularly review the appropriateness of the three asset allocation strategies, taking into account any significant changes in the demographic profile of the relevant members, and may make changes to fund choice from time to time. Members will be advised accordingly of any changes.

Whilst the Trustees retain responsibility for choosing the funds made available to members, it is the individual member's responsibility to:

- choose which specific funds they invest in, either by choosing the Default Option, one of the alternative asset allocation strategies, or by following their own investment strategy;
- monitor the performance of their own investments; and
- review the ongoing appropriateness of their chosen funds in light of their own individual circumstances.

#### 1.2.2 Day-to-day management

The Trustees invest the main assets of the Defined Contribution section of the Fund in funds managed by the Fiduciary Manager. The Trustees are satisfied that the spread of underlying managers and assets classes selected by the Fiduciary Manager's provide adequate diversification of investments. The Trustees have regard to the suitability of the investment funds described above through periodic strategy and performance review. The Trustees expect the Fiduciary Manager of the funds to have regard to the suitability of the investment contained within each fund in accordance with each fund's investment aims.

#### 1.3 The balance between different kinds of investments

The Trustees recognise that the key source of financial risk in relation to meeting its objectives normally arises from the choice of funds offered to members and is mindful of the fact that holding all the Defined Contribution assets in a traditional balanced fund could involve too high a level of investment risk for members approaching retirement. As a result, the Trustees implement a "lifestyle" default strategy for the Defined Contribution Section. Members are, however, able to choose a different strategy if they so wish.

The Trustees retain responsibility for choosing the funds available and take advice as required from its adviser.

## 1.4 Investment risk measurement and management

The Trustees have considered risk from a number of perspectives. These are:

- The risk that the investment return achieved on the contributions invested over members' working lives does not provide a fund sufficient to secure an adequate pension. To mitigate this risk the underlying investment strategy aims to give a greater potential for growth over the longer term when members are still a number of years from retirement.
- The risk that relative market movements in the years just prior to retirement lead to a substantial reduction in the retirement outcomes compared with the members' expectations.
  - For those members invested in one of the three asset allocation strategies, members' funds will automatically be switched into lower risk funds, as described in the IPID, as they approach retirement, with the aim of reducing volatility. Where members are making their own investment choices, it should be noted that the risk profile of the members' assets will be affected by their choice of funds, and that the range of funds that is available includes funds that are aimed at offering relative security as retirement approaches.
- The risk that the chosen investment manager underperforms the benchmark against which the manager is assessed. The Trustees recognise that the use of an active manager involves such a risk and for this reason offer both active and passive investment options for members. The risk of manager underperformance is mitigated by the delegated nature of fund manager selection.
- The risk that the absolute return on investments, and hence the value of the retirement income, may be diminished by inflation. To help mitigate this risk, a range of funds is offered, including growth funds which aim to provide real growth (in excess of inflation) over the long term.
- The risk of fraud, poor advice or acts of negligence. The Trustees have sought to minimise such risk by ensuring that all advisers and third party service providers are suitably qualified and experienced.

The Trustees recognise that members take the investment risk and the Trustees manage this risk through the selection and monitoring of investment performance and the choice of funds offered to members. The Trustees also monitor the continued appropriateness of the default strategy for the membership investment risk measurement and management.

## 2 - Defined Benefit Section

## 2.1 Investment Objectives

The Trustees recognise that the key objective is to maximise the probability that the Fund is able to provide all of the benefits due to members. They recognise that the investment strategy should take account of the principal employer's interests in respect of the size and incidence of contributions required to meet these liabilities.

In particular, the agreed overall objective is set to an investment strategy that targets an expected return over the liabilities of 1.2% p.a. net of fees.

## 2.2 Investment Strategy

The initial asset allocation strategy chosen to meet the objective above is set out in the table below. The Fund's actual position relative to this asset allocation strategy is to be formally reviewed on an annual basis in order to determine whether any rebalancing is required.

Fund	Target Weight (%)
Fruition Fund (Fixed + 1% p.a.)	80.0
Fruition Fund (Fixed + 2% p.a.)	20.0
Total	100.0

Within these Fruition funds, there are two components:

- Matching allocation: A portfolio of leveraged fixed interest gilt funds (LDI funds), which are designed to match a typical pension scheme's fixed liabilities with around 20 year duration.
- Growth allocation: An allocation to the Managed Growth Fund to target overall 1% and 2% p.a. outperformance relative to benchmark, depending on the fund.

These are expected to broadly match the Fund's liabilities and to add returns.

# 2.3 Choosing investments

The types of investments held and the balance between them is deemed appropriate given the liability profile of the Fund, its cashflow requirements, the funding level of the Fund and the Trustees' objectives.

It is the Trustees' intention to ensure that the assets of the Fund are invested in the best interests of the members and beneficiaries.

The Trustees exercise their powers of investment (and delegation where certain powers have been delegated to the Fiduciary Manager) in a manner calculated to ensure, as far as is reasonably practicable, the security, quality, liquidity and profitability of the portfolio as a whole. In order to avoid an

undue concentration of risk, a spread of assets is held. The Trustees have considered the diversification both within and across the major asset classes.

Assets held to cover the liabilities of the Fund are invested in a manner appropriate to the nature and duration of the expected future retirement benefits payable under the Fund.

The assets of the Fund are invested predominantly in regulated markets (with investments not in regulated markets being kept to a prudent level) and properly diversified to avoid excessive reliance on any particular asset, issuer or group of undertakings so as to avoid accumulations of risk in the portfolio as a whole.

Investment in derivatives by the Fiduciary Manager is only made insofar as they contribute to the reduction of investment risks or facilitate efficient portfolio management and are managed such as to avoid excessive risk exposure to a single counterparty or other derivative operations.

The Trustees monitor the level of self-investment by the Fund on a periodic basis and are satisfied that at the current time there is negligible self-investment.

#### 2.4 The balance between different kinds of investments

The Trustees recognise that the key source of financial risk in relation to meeting its objectives arises from asset allocation. Following consideration of the implementation options, the Trustees appointed the Fiduciary Manager to manage the underlying allocations within the Fruition Funds to growth and matching assets. This has been done to aid the diversification of the Fund's assets and to reduce the investment risk relative to the Fund's liabilities. This also allows the asset allocation of the Fund to be adjusted quickly in response to market conditions to best meet the investment objective of the Fund.

The Trustees review their investment strategy in conjunction with each formal actuarial valuation of the Fund, or more frequently should the circumstances of the Fund change in a material way.

# 2.5 Investment risk measurement and management

The key investment risks are recognised as arising from investment strategy, employer failure and investment managers.

#### **Investment Strategy risks**

The Trustees will determine the most appropriate investment strategy for the Fund by taking into account advice from its investment advisor and characteristics of the Fund's liabilities. The Trustees will review the investment strategy following an update of the actuarial valuation.

Checks will be made to assess whether the funding and investment strategy remains on target to achieve the original objectives and within acceptable parameters. If it does not, then corrective action will be considered by adjusting investment policy or through amendments to the Schedule of Contributions.

#### **Employer failure risks**

Risks associated with changes in the employer covenant are assessed by monitoring the Failure Score as defined for the purposes of calculating the risk-based element of the Pension Protection Fund levy.

The Trustees also have an agreement with the principal employer to receive notification of any events which have the potential to alter the creditworthiness of the sponsoring employer.

In particular, the Trustees will be informed of Type A events, as defined in appropriate guidance issued by the Pensions Regulator, and employer-related Notifiable Events. On receipt of such notification, the Trustees will re-consider the continued appropriateness of the Fund's existing investment strategy.

#### Manager risks

The Trustees have delegated a number of day-to-day decisions in respect of the Fund's investment to the Fiduciary Manager through its investment in a number of underlying funds. This includes the allocation of assets between different asset classes and the appointment and monitoring of underlying managers.

The Trustees will monitor the performance of the Fiduciary Manager versus the Fund's investment objective and the performance the underlying managers chosen by the Fiduciary Manager against their individual benchmarks/targets on a regular basis.

For due diligence and good governance purposes, the Trustees will meet with the Fiduciary Manager on a regular basis.

## 2.6 Expected returns on assets

Over the long term, the Trustees' expectations are:

- for the "matching" assets (i.e. the LDI funds) to achieve a rate of return which is broadly in line with changes in the valuation of the Fund's liabilities due to changes in interest rates;
- for the "growth" assets (i.e. the managed growth fund) to provide additional return above the liabilities to achieve the stated investment objective over the medium to long term. The Trustees are willing to incur short-term volatility in asset price behaviour, with the expectation that, over the long term, these assets will outperform asset classes which may be regarded as matching the liabilities; and
- for the assets as a whole to provide projected returns at least in line with the Trustees' funding assumptions as set out in the Statement of Funding Principles.

Returns achieved by the Fiduciary Manager are assessed against the investment objective set by the Trustees in consultation with their advisers.

# 3 - Both sections: Defined Contribution (DC) and Defined Benefit (DB)

## 3.1 Realisation of investments/liquidity

The Trustees recognise that there is a risk in holding assets that cannot be easily realised should the need arise. Units in the funds in which the Fund invests may normally be bought and sold on a daily basis and hence the Trustees are satisfied with the liquidity of the Fund's investments.

## 3.2 Environmental, Social, and Governance (ESG) considerations

In setting the Fund's DB and DC investment strategies, the Trustees' primary concern is to act in the best financial interests of the Fund's beneficiaries, seeking the best return that is consistent with a prudent and appropriate level of risk. This includes the risk that environmental, social and governance factors including climate change negatively impact the value of investments held if not understood and evaluated properly.

The Trustees consider this risk by taking advice from their investment adviser. The Trustees have appointed the Fiduciary Manager to manage the Fund's assets and the Fiduciary manager invests in a range of underlying investment vehicles. References in this policy to 'underlying investment managers' refers to those investment managers which the Fiduciary Manager in turn appoints to manage investments on behalf of the Trustees.

As part of the Fiduciary Manager's management of the Fund's assets, the Trustees expect the Fiduciary Manager to:

- Where relevant, assess the integration of ESG factors in the investment process of underlying managers;
- Use its influence to engage with underlying managers to ensure the Fund's assets are not exposed to undue risk; and
- Report to the Trustees on its ESG activities as required.

# 3.3 Stewardship - Voting and Engagement

The Trustees recognise the importance of their role as a steward of capital and the need to ensure high standards of governance and promotion of corporate responsibility in the underlying companies and assets in which the Fund invests, as this ultimately this creates long-term financial value for the Fund and its beneficiaries.

The Trustees review the stewardship activity of the Fiduciary Manager on an annual basis to ensure the Fund's stewardship policy is being appropriately implemented in practice. The Trustees receive annual reports on stewardship activity carried out by their Fiduciary Manager, these reports include detailed voting and engagement information from underlying asset managers.

As part of the Fiduciary Manager's management of the Fund's assets, the Trustees expect the Fiduciary Manager to:

- Ensure that (where appropriate) underlying asset managers exercise the trustees' voting rights in relation to the Fund's assets; and
- Report to the Trustees on stewardship activity by underlying asset managers as required.

The Trustees will engage with their Fiduciary Manager as necessary for more information, to ensure that robust active ownership behaviours, reflective of their active ownership policies, are being actioned. This will take the form of annual reporting which will be made available to Fund members on request.

Where possible, the transparency for voting should include voting actions and rationale with relevance to the Fund, in particular where: votes were cast against management, votes against management generally were significant or if votes were abstained. Where voting is concerned, the Trustees expect the underlying asset managers, to recall stock lending, as necessary, in order to carry out voting actions.

The Trustees may engage with their Fiduciary Manager, who in turn is able to engage with underlying asset managers, investee company or other stakeholders, on matters including the performance, strategy, risks, social and environmental impact, corporate governance, capital structure, and management of actual or potential conflicts of interest, of the underlying investments made. Where a significant concern is identified, the Trustees will consider, on a case by case basis, a range of methods by which they would monitor and engage so as to bring about the best long-term outcomes for the Fund.

#### 3.4 Members' Views and Non-Financial Factors

In setting and implementing the Fund's investment strategy (for both DB and DC) the Trustees do not explicitly take into account the views of Fund members and beneficiaries in relation to ethical considerations, social and environmental impact, or present and future quality of life matters (defined as "non-financial factors").

For DC members, the Trustees have made the Ethical and Islamic funds available to members who would like to invest in funds with these specific considerations. The underlying funds that make up the default fund and other self-select funds should not apply personal ethical or moral judgements as the sole basis for an investment decision.

# 3.5 Arrangements with Investment Managers

The Trustees recognise that the arrangements with their Fiduciary Manager, and correspondingly the underlying investment managers, are important to ensure that interests are aligned. In particular, the Trustees seek to ensure that the Fiduciary Manager is incentivised to operate in a manner that generates the best long-term results for the Fund and its beneficiaries.

The Trustees receive regular reports from the Fiduciary Manager on various items including the investment strategy, performance, and longer-term positioning of the portfolio. The Trustees focus on longer-term performance when considering the ongoing suitability of the investment strategy in relation to the Fund objectives, and assess the fiduciary manager over 3-year periods.

The Trustees also receive annual stewardship reports on the monitoring and engagement activities carried out by their fiduciary manager, which supports the Trustees in determining the extent to which the Fund's engagement policy has been followed throughout the year.

The Trustees share the policies, as set out in this Statement, with the Fund's Fiduciary Manager and request that they review and confirm whether their approach is in alignment with the Trustees' policies.

The Trustees delegate the ongoing monitoring of underlying investment managers to the Fiduciary Manager. The Fiduciary Manager monitors the Fund's investments to consider the extent to which the investment strategy and decisions of the underlying investment managers are aligned with the investment objectives of the Fund.

This includes monitoring the extent to which the underlying investment managers:

- make decisions based on assessments about medium- to long-term financial and nonfinancial 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.

Before appointment of a new Fiduciary Manager, the Trustees review the governing documentation associated with the investment and will consider the extent to which it aligns with the Trustees' policies. Where possible, the Trustees will seek to amend that documentation or express their expectations (such as through side letters, in writing, or verbally at Trustee meetings) so that there is more alignment.

The Trustees believe that having appropriate governing documentation, setting clear expectations to the fiduciary manager, and regular monitoring of the Fiduciary Manager's performance and investment strategy, is sufficient to incentivise the Fiduciary Manager to make decisions that align with the Trustees' policies and are based on assessments of medium- and long-term financial and non-financial performance.

Where the fiduciary manager is considered to make decisions that are not in line with the Trustees' policies, expectations, or the other considerations set out above, the Trustees will typically engage with the Fiduciary Manager to understand the circumstances and materiality of the decisions made.

There is typically no set duration for arrangements with the fiduciary manager, although the continued appointment will be reviewed periodically. Similarly, there are no set durations for arrangements with the underlying investment managers that the Fiduciary Manager invests in, although this is regularly reviewed as part of the manager research and portfolio management processes in place.

# 3.6 Monitoring of Investment Manager Costs

#### **Defined Contribution Section**

#### **Cost Monitoring**

For the DC Section, the Trustees collect information on member-borne costs and charges on an annual basis, where available, and sets these out in the Plan's Annual Chair's Statement regarding DC Governance (the "Annual Chair's Statement"), which is made available to members in a publicly accessible location.

#### **Defined Contribution and Defined Benefit Section**

No specific ranges are set for acceptable costs and charges, particularly in relation to portfolio turnover costs. However, the Trustees expects their advisers to highlight if these costs and charges appear unreasonable when they are collected as part of the Annual Chair's Statement exercise.

The Trustees are aware of the importance of monitoring their investment managers' total costs and the impact these costs can have on the overall value of the Fund's assets. The Trustees recognise that in addition to annual management charges, there are other costs incurred by investment managers that can increase the overall cost incurred by their investments.

The Trustees receive annual cost transparency reports from their Fiduciary Manager. These reports present information in line with prevailing regulatory requirements for fiduciary managers. They clearly set out on an itemised basis:

- The total amount of investment costs incurred by the Fund;
- The fees paid to the Fiduciary Manager;
- The fees paid to the investment managers appointed by the Fiduciary Manager;
- The amount of portfolio turnover costs (transaction costs) incurred by the investment managers appointed by the Fiduciary Manager;
  - The Trustees define portfolio turnover costs as the costs incurred in buying and selling underlying securities held within the funds of the investment managers appointed by the Fiduciary Manager;
- Any charges incurred through the use of pooled funds (custody, administration, and audit fees)
- The impact of costs on the investment return achieved by the Fund.

The Trustees acknowledge that portfolio turnover costs are a necessary cost to generate investment returns and that the level of these costs varies across asset classes and manager. The Fiduciary Manager monitors the level of portfolio turnover (defined broadly as the amount of purchases plus sales) of all the investment managers appointed on behalf of the Trustees.

The Trustees benefit from the economies of scale provided by the Fiduciary Manager in two key cost areas:

- The ability of the Fiduciary Manager to negotiate reduced annual management charges with the appointed investment managers;
- The ability of the Fiduciary Manager to monitor ongoing investment costs (including additional fund expenses and portfolio turnover) incurred by the investment managers and achieve efficiencies where possible;

#### **Evaluation of Performance and Remuneration**

The Trustees assess the (net of all costs) performance of their Fiduciary Manager on a rolling three-year basis against the Fund's specific investment objective. The remuneration paid to the Fiduciary Manager and fees incurred by third parties appointed by the Fiduciary Manager are provided annually by the Fiduciary Manager to the Trustees. This cost information is set out alongside the performance of the Fiduciary Manager to provide context. The Trustees monitor these costs and performance trends over time.

# 3.5 Effective Decision Making

The Trustees recognise that decisions should be taken only by persons or organisations with the skills, information and resources necessary to take them effectively. They also recognise that where they take investment decisions, they must have sufficient expertise and appropriate training to be able to evaluate critically any advice received.

# 3.6 Additional Voluntary Contributions ("AVCs") Arrangements

Some members obtain further benefits by paying Additional Voluntary Contributions (AVCs) to the Fund. The majority of members AVC assets are invested in the same funds that are utilised for the main Fund. Some assets are also invested with Scottish Widows Fund and Life Assurance Society.

From time-to-time the Trustees review the choice of investments available to members to ensure that they remain appropriate to the members' needs.

Approved and agreed by the Trustees of the Servier Laboratories Limited Pension Fund on 31 March 2023.