

# **The Colt Car Company Limited Retirement Benefits Scheme**

## **Statement of Investment Principles (“SIP”)**

### **Purpose of this Statement**

This SIP has been prepared by the Trustee of the Colt Car Company Limited Retirement Benefits Scheme (the “Scheme”). This statement sets out the principles governing the Trustee’s decisions to invest the assets of the Scheme.

The Scheme’s investment strategy is derived from the Trustee’s investment objectives. The objectives have been taken into account at all stages of planning, implementation and monitoring of the investment strategy.

### **Governance**

The Trustee of the Scheme makes all major strategic decisions including, but not limited to, the Scheme’s asset allocation and the appointment and termination of investment managers.

When making such decisions, and when appropriate, the Trustee takes proper written advice. The Trustee’s investment advisers, Isio Group Limited, are qualified by their ability in, and practical experience, of financial matters, and have the appropriate knowledge and experience. The investment advisers’ remuneration may be a fixed fee or based on time worked, as negotiated by the Trustee in the interests of obtaining best value for the Scheme.

The Trustee expects the insurers to manage the assets delegated to them under the terms of their contract and to give effect to the principles in this Statement so far as is reasonably practicable. The insurers’ remuneration was reflected in the premium paid to them as part of the take on of assets when the buy-in policy was established.

### **Investment objectives**

The Trustee invests the assets of the Scheme with the aim of ensuring that all members’ current and future benefits can be paid.

### **Investment strategy**

The Trustee takes a holistic approach to considering and managing risks when formulating the Scheme’s investment strategy.

The Scheme’s investment strategy is to invest according to the following asset allocation:

<b>Asset class</b>	<b>Proportion %</b>
Buy-in policies	100
<b>Total</b>	<b>100</b>

Any residual cash is being held in a Sterling Liquidity Fund (managed by Legal & General Investment Management) or the Trustee Bank Account.

The Scheme’s investment strategy was derived following careful consideration of various factors as set out in Appendix A. The considerations include the nature and duration of the

Scheme's liabilities, the risks of investing in the various asset classes, the implications of the strategy (under various scenarios) for the level of employer contributions required to fund the Scheme, and also the strength of the sponsoring company's covenant. The Trustee considered the merits of a range of asset classes. The Trustee and its advisers considered these risks when setting the investment strategy and agreed the best way to mitigate these risks was to insure member benefits via buy-in policies.

### **Implementation**

The Scheme's assets are invested with insurers via buy-in policies, with the latest buy-in policy invested with Just Retirement Limited.

The Trustee has delegated all day-to-day decisions about the operations that fall within the mandate to the insurers through a written contract. When choosing investments, the Trustee, investment managers and insurers (to the extent delegated) are required to have regard to the criteria for investment set out in the Occupational Pension Schemes (Investment) Regulations 2005 (regulation 4). The investment managers and insurers' duties include voting and corporate governance in relation to the assets.

### **Environmental, Social and Governance ("ESG") considerations**

The Trustee considers investment risk to include ESG factors and climate change. These risks could negatively impact the Scheme's investments.

As part of the investment management of the Scheme's assets, the Trustee expects the insurers to:

- Where relevant, assess the integration of ESG factors in the investment process; and
- Use its influence to engage to ensure the Scheme's assets are not exposed to undue risk.

### **Stewardship – voting and engagement**

As part of the management of the Scheme's assets, the Trustee expects the insurers to ensure that (where appropriate) it exercises the Trustee's voting rights in relation to the Scheme's assets.

### **Employer-related investments**

The policy of the Trustee is not to hold any employer-related investments as defined in the Pensions Act 1995 and the Occupational Pension Schemes (Investment) Regulations 2005 and any subsequent legislative amendments, and the buy-in policies are consistent with this.

### **Direct investments**

Direct investments, as defined by the Pensions Act 1995, are products purchased without delegation to an investment manager through a written contract. When selecting and reviewing any direct investments, the Trustee will obtain appropriate written advice from their investment advisers.

The buy-in policies of deferred and pensioner liabilities are direct investments.

**Compliance**

This Statement has been prepared in compliance with the Pensions Act 1995, the Pensions Act 2004, and the Occupational Pension Schemes (Investment) Regulations 2005. Before preparing or subsequently revising this Statement, the Trustee consulted the sponsoring company and took appropriate written advice. The Statement is reviewed at least every three years, and without delay after any significant change in the investment arrangements.

**Signed: Kevin Wesbroom**

**Date: 15.01.24**

## Appendix A – Risks, Financially Material Considerations and Non-Financial matters

A non-exhaustive list of risks and financially material considerations that the Trustee has considered and sought to manage is shown below.

The Trustee adopts an integrated risk management approach. The three key risks associated within this framework and how they are managed are stated below:

<b>Risks</b>	<b>Definition</b>	<b>Policy</b>
Investment	The risk that the Scheme's position deteriorates due to the assets underperforming.	<ul style="list-style-type: none"><li>• Selecting an investment objective that is achievable and is consistent with the Scheme's funding basis and the sponsoring company's covenant strength.</li><li>• Considered when deciding which insurer to use to transact the buy-in policy.</li></ul>
Funding	The extent to which there are insufficient Scheme assets available to cover ongoing and future liability cash flows.	<ul style="list-style-type: none"><li>• Funding risk is considered as part of the investment strategy review and the actuarial valuation.</li><li>• The Trustee has fully insured the Scheme's liabilities via buy-in policies.</li></ul>
Covenant	The risk that the sponsoring company becomes unable to continue providing the required financial support to the Scheme.	<ul style="list-style-type: none"><li>• The nature of the buy-in policies now largely mitigates against the impact of a change in the Sponsor covenant.</li><li>• Reliance on the Sponsor covenant will only be removed entirely when the Scheme transitions to buy-out.</li></ul>

The Scheme is exposed to a number of underlying risks relating to the Scheme's investment strategy, these are summarised below:

<b>Risk</b>	<b>Definition</b>	<b>Policy</b>
Interest rates and inflation	The risk of mismatch between the value of the Scheme assets and present value of liabilities from changes in interest rates and inflation expectations.	Mitigated by insuring member benefits via buy-in policies.
Liquidity	Difficulties in raising sufficient cash when required without adversely impacting the fair market value of the investment.	Mitigated by insuring member benefits via buy-in policies.  To hold residual assets in a liquid cash fund to meet future expenditures as required.
Market	Experiencing losses due to factors that affect the overall performance of the financial markets.	Mitigated by insuring member benefits via buy-in policies.

Credit	Default on payments due as part of a financial security contract.	Mitigated by insuring member benefits via buy-in policies.
Currency	The potential for adverse currency movements to have an impact on the Scheme's investments.	Mitigated by insuring member benefits via buy-in policies.
Non-financial	Any factor that is not expected to have a financial impact on the Scheme's investments.	No longer applicable given the liabilities are insured via the buy-in policies.