

BUCCLEUCH ESTATES LIMITED 1974 RETIREMENT FUND

STATEMENT OF INVESTMENT PRINCIPLES

JULY 2025

1. INTRODUCTION

The Trustee of the Buccleuch Estates Limited 1974 Retirement Fund (the 'Fund') has adopted this Statement of Investment Principles (the 'Statement') to comply with the Pensions Act 1995, the Pensions Act 2004 and the Occupational Pension Schemes (Investment) Regulations 2005. This Statement replaces all previous Statements.

When making its investment decisions and reviewing this Statement, the Trustee obtained and considered the written advice of Cartwright Financial Solutions Limited, whom the Trustee reasonably believes to be qualified by its ability in and practical experience of financial matters and to have the appropriate knowledge and experience of the management of the investments of such schemes. Cartwright Benefit Solutions Limited is also authorised under the Financial Services and Markets Act 2000 to provide investment advice to the Trustee.

Whilst the Trustee is solely responsible for the Fund's investment strategy, the Trustee consulted Buccleuch Estates Limited (the 'Employer') on both the investment decisions taken by the Trustee and this Statement's content.

2. INVESTMENT OBJECTIVES

The primary investment objective of the Trustee is to ensure that the Fund will be able to pay all beneficiaries in full as and when their benefits fall due, taking into account the existing assets, the investment returns expected to be achieved, and the contributions from the Employer.

To increase the certainty of achieving the primary investment objective, the Trustee will aim to reduce the Fund's investment risk where possible and practical to do so, subject to still targeting sufficient investment returns. The level of investment risk will also be considered in the context of the ability and willingness of the Employer to support the investment risk being taken and the impact changes in financial market conditions may have on the Employer's future contribution requirements.

The Trustee understands that the Employer is willing to accept some volatility in the Employer's contribution requirements in the expectation that the total contributions payable would be lower than they otherwise would be (although in practice the actual contributions required could be much higher or much lower if the investments perform differently to expected).

3. INVESTMENT STRATEGY

The Trustee's investment strategy for the Fund is described in the Appendix. The key considerations when designing it were as follows.

- (a) The Fund's Individual Gilts, Gilt Funds and Corporate Bonds have been chosen such that they replicate the profile of the Fund's liabilities. This means they are expected to move similarly to the Fund's liabilities over both the shorter and the longer-term, thereby reducing the potential volatility of the Fund's deficit (i.e. the difference between the Fund's liabilities and the Fund's assets).

- (b) Overall, the Fund's assets should be sufficiently liquid to enable all beneficiaries to be paid as and when their benefits fall due. To support this, and to help to avoid the Trustee needing to disinvest from the more volatile assets when financial markets are stressed, the income generated from the Corporate Bonds and Individual Gilts will be paid directly into the Trustee bank account, rather than reinvested.
- (c) The Fund has diversified the investment portfolio by accessing corporate credit and UK government exposure.
- (d) Maintaining an element of growth within the portfolio through a multi-asset credit fund and an absolute return bond fund to give the Fund a stable source of returns.

4. RISK MEASUREMENT AND MANAGEMENT

The Trustee regularly reviews a wide range of risks to which the Fund is exposed and mitigates these risks where possible and practical to do so. The Trustee believes that the investment strategy adopted is consistent with the agreed risk management policy.

The Trustee's policies on the key investment-related risks are as follows:

- **Employer covenant:** the investment risk taken by the Fund is underwritten by the Employer because, should investment returns not be achieved as expected over the longer-term, the Employer will ultimately be required to increase its contributions to enable all beneficiaries to be paid in full. The Trustee regularly monitors the Employer's covenant and considers the level of the Fund's investment risk in light of the strength of the Employer's covenant.
- **Mismatch risk:** Although the Trustee has taken action to reduce the level of mismatch risk within the Fund, the inherent nature of the assets and the liabilities, and the need for the Fund to take some investment risk to reduce the deficit over time, means that the assets and liabilities are not expected to move in tandem under all financial market conditions and the deficit may rise or fall as a result. The Trustee explicitly takes the Fund's liabilities into account when setting the investment strategy (including their nature and duration) and aims to diversify across and within the different risk factors where appropriate.
- **Active manager risk:** the Trustee recognises that actively managed funds can under- or out-perform their benchmark indices. Actively managed funds are therefore used for asset classes where the Trustee believes that the chosen investment manager is likely to consistently and sustainably either out-perform the benchmark index, reduce the volatility of investment returns, or both.
- **Diversification:** in addition to diversifying across different risk factors (see above), where appropriate, the Trustee also diversifies across asset classes, counter-parties, and geographically. This helps to avoid excessive concentrations of risk. To achieve cost-effective diversification, the Fund's assets are partially invested in pooled funds.
- **Liquidity:** to pay beneficiaries, the Trustee is increasingly expected to need to regularly liquidate some of the invested assets to supplement any cash held in the Trustee's bank account and Employer contributions. Some asset classes can be relatively illiquid and/or volatile, creating disinvestment delays or crystallising potentially short-term investment losses. The Trustee regularly reviews the Fund's income and outgo in the context of the overall liquidity of the invested assets (i.e. this allows a proportion of the Fund's assets to be relatively illiquid if deemed appropriate). The Trustee also has an investment/disinvestment cash flow

policy (see the Appendix) to help to ensure beneficiaries are paid as and when their benefits fall due. The selection, retention, and realisation of investments within each investment fund is delegated to the relevant investment manager.

- Derivatives: derivatives tend to involve leverage to magnify the exposure to certain financial instruments. All the derivatives used by the Fund either contribute to the reduction of risk or are used for efficient portfolio management. The diversified derivative counter-party exposure and the collateralisation process are delegated to, and kept under regular review by, each investment manager.
- Environmental, Social and Governance (ESG) / climate change: There is a risk that ESG issues and climate change are not considered as part of the investment process and so may expose the portfolio to unexpected risks. This can lead to losses that may not have been factored into any expectations of future investment returns. The Trustee has considered ESG issues including climate change as part of the investment process.
- Regulatory: the Fund's assets are invested on regulated markets.

5. MONITORING THE INVESTMENT STRATEGY

The Trustee regularly reviews the performance of the investment strategy, including: the performance of the Fund's assets against the Fund's liabilities, the actual asset allocation against the strategic asset allocation, each investment funds' performance against their benchmark index, and the investment/disinvestment cash flow policy.

The Trustee will formally review and obtain written investment advice on the suitability of the investment strategy at least every three years in line with the timing of each triennial actuarial valuation. These reviews will include the ongoing suitability of the retention of the investment funds used.

Certain parts of the investment strategy may be reviewed more frequently if required.

6. FEE STRUCTURES

The investment managers are each paid a percentage of the market value of the assets within their fund(s). The investment platform provider is paid a percentage of the assets on its platform plus an additional percentage for any funds where investment income is distributed rather than reinvested. No additional performance fees are payable. Some operational expenses are also incurred by each fund to cover administration, audit, legal and custodial costs, along with the transaction costs associated with the buying and selling of the underlying securities as the investment manager changes the constituents of the fund over time (particularly for actively managed funds).

The investment adviser is paid on a time-cost, fixed fee or other basis, as agreed from time-to-time between the Trustee and the investment adviser.

7. FINANCIALLY MATERIAL CONSIDERATIONS

The Trustee has considered financially material factors such as environmental, social and governance ('ESG') issues as part of the investment process to determine a strategic asset allocation over the length of time during which the benefits are provided by the Fund for members. An estimate of the potential time horizon is included in the Appendix and will be reviewed at least every 3 years when the investment strategy is reviewed. The Trustee believes that ESG factors (including climate change risks) can potentially have a material positive or negative financial impact on the Fund.

In endeavouring to invest in the best financial interests of the beneficiaries, the Trustee has elected to invest partially through pooled funds. The Trustee acknowledges that it cannot directly influence the environmental, social and governance policies and practices of the companies in which the pooled funds invest. However, the Trustee does expect its fund managers and investment consultant to take account of financially material considerations when carrying out their respective roles.

The Trustee accepts that the Fund's assets are subject to the investment managers' own policies on socially responsible investment. The Trustee will assess that these correspond with their responsibilities to the beneficiaries of the Fund with the help of their investment consultant.

An assessment of the ESG and responsible investment policies forms part of the manager selection process when appointing new managers and these policies are also reviewed regularly for existing managers with the help of the investment consultant. The Trustee expects the investment managers to adhere to the United Nations Principles for Responsible Investment (UNPRI) or to otherwise evidence that they adopt best industry practice on ESG and Stewardship.

The Trustee will monitor financially material considerations through the following means:

- Obtain training where necessary on ESG considerations in order to understand fully how ESG factors including climate change could impact the Fund and its investments;
- Use ESG ratings information provided by its investment consultant, to assess how the Fund's investment managers take account of ESG issues; and
- Request that all of the Fund's investment managers provide information about their ESG policies, and details of how they integrate ESG into their investment processes, via their investment consultant.

If the Trustee determines that financially material considerations have not been factored into the investment managers' process, they will take this into account on whether to select or retain an investment.

8. NON-FINANCIALLY MATERIAL CONSIDERATIONS

The Trustee has not considered non-financially material matters in the selection, retention and realisation of investments.

9. STEWARDSHIP

The Trustee's policy on the exercise of rights attaching to investments, including voting rights, is that these rights should be exercised by the investment managers on the Trustee's behalf, having regard to the best financial interests of the beneficiaries.

The investment managers should engage with companies to take account of ESG factors in the exercise of such rights as the Trustee believes this will be beneficial to the financial interests of members over the long term. The Trustee will review the investment managers' voting policies, with the help of its investment consultant, and decide if they are appropriate.

The Trustee also expects the investment managers to engage with investee companies on the capital structure and management of conflicts of interest.

If the policies or level of engagement are not appropriate, the Trustee will engage with the investment manager, with the help of their investment consultant, to influence the investment manager's policy. If this fails, the Trustee will review the investments made with the investment manager.

The Trustee has taken into consideration the Financial Reporting Council's UK Stewardship Code and expect investment managers to adhere to this where appropriate for the investments they manage.

10. INVESTMENT MANAGER ARRANGEMENTS

Incentives to align investment managers' investment strategy and decisions with the Trustee's policies

The Fund invests in pooled funds and so the Trustee acknowledges the funds' investment strategy and decisions cannot be tailored to the Trustee's policies. However, the Trustee set its investment strategy and then selects managers that best suit its strategy taking into account the fees being charged, which acts as the fund managers' incentive.

The Trustee uses the fund objective/benchmark as a guide on whether its investment strategy is being followed and monitors this regularly.

Incentives for the investment manager to make decisions based on assessments about medium to long-term financial and nonfinancial performance of an issuer of debt or equity and to engage with issuers of debt or equity in order to improve their performance in the medium to long-term

The Trustee selects managers based on a variety of factors including investment philosophy, and process, which it believes should include assessing the long term financial and non-financial performance of the underlying company.

The Trustee also considers the managers' voting and ESG policies and how they engage with the company as they believe that these factors can improve the medium to long-term performance of the investee companies.

The Trustee will monitor the fund managers' engagement and voting activity on an annual basis as they believe this can improve long term performance. The Trustee expects their managers to make every effort to engage with investee companies but acknowledge that their influence may be more limited in some asset classes, such as bonds, as they do not have voting rights.

The Trustee acknowledges that in the short term, these policies may not improve the returns it achieves, but do expect those companies with better financial and non-financial performance over the long term will lead to better returns for the Fund.

The Trustee believes the annual fee paid to the fund managers incentivise them to do this.

If the Trustee feels that the fund managers are not assessing financial and non-financial performance or adequately engaging with the companies they are investing in, it will use these factors in deciding whether to retain or terminate a manager.

How the method (and time horizon) of the evaluation of the asset manager's performance and the remuneration for asset management services are in line with the Trustee's policies

The Trustee reviews the performance of each fund quarterly on a net of fees basis (where this is possible) compared to its objective.

The Trustee assesses the performance periods of the funds over at least a 3-5 year period when looking to select or terminate a manager, unless there are reasons other than performance that need to be considered.

The fund managers' remuneration is considered as part of the manager selection process and is also monitored regularly with the help of its investment consultant to ensure it is in line with the Trustee's policies.

How the Trustee monitors portfolio turnover costs incurred by the asset manager, and how they define and monitor targeted portfolio turnover or turnover range

The Trustee, with the help of its investment consultant, monitors the portfolio turnover costs on an annual basis.

The Trustee defines target portfolio turnover as the average turnover of the portfolio expected in the type of strategy the manager has been appointed to manager. This is monitored on an annual basis.

The duration of the arrangement with the asset manager

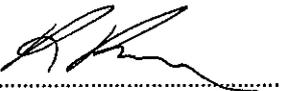
The Trustee plans to hold each of their investments for the long term but will keep this under review.

Changes in investment strategy or change in the view of the fund manager can lead to the duration of the arrangement being shorter than expected.

11. FUTURE REVIEW

The Trustee will review this Statement at least every three years and without delay after any significant change in investment policy.

Any such, review will be based on written investment advice from someone whom the Trustee reasonably believes to be qualified by his or her ability in and practical experience of financial matters and to have the appropriate knowledge and experience of the management of the investments of such schemes. The Employer will also be consulted.

Signed  Date 3 / 7 / 2025

For and on behalf of the Trustee of the Buccleuch Estates Limited 1974 Retirement Fund.

APPENDIX – OVERVIEW OF THE FUND'S INVESTMENT STRATEGY

1. Choosing Investments

The Trustee has adopted the investment strategy described below, which consists of a strategic asset allocation, target hedge ratios, and investment/disinvestment cash flow policy. The strategic asset allocation determines how the Fund's assets are split between different asset classes, and results in an overall longer-term "best estimate" expected investment return and an estimated date for the assets to reach the long term solvency target. The Trustee subsequently selected which investment manager and funds are used to implement each asset class – all the investment managers are regulated under the Financial Services and Markets Act 2000.

The Trustee has chosen Mobius Life Limited as the Fund's execution only investment platform provider to hold the funds listed below and to help to streamline the Fund's investment administration. Mobius Life Limited is authorised by the Prudential Regulation Authority and regulated by both the Financial Conduct Authority and the Prudential Regulation Authority.

Asset class	Investment manager	Investment fund	Income Distributing	Strategic asset allocation
Short Dated Bonds	M&G	Total Return Credit Investment Fund	No	8.0
	Vontobel	TwentyFour Absolute Return Credit Fund	No	8.0
Corporate Bonds		CAAW Maturing Buy and Maintain Credit Fund 2030-2034	Yes	10.0
		CAAX Maturing Buy and Maintain Credit Fund 2035-2039	Yes	8.0
Gilt Funds		Y - All Stocks Index-Linked Gilts Index Fund	No	20.0
		NF – 2042 Gilt Fund	Yes	10.0
		VH – 2049 Gilt Fund	Yes	10.0
		HB - 2055 Gilt Fund	Yes	8.0
		YC – 2060 Gilt Fund	Yes	9.0
		BSAP - 2065 Gilt Fund	Yes	4.0
		BSAR – 2071 Gilt Fund	Yes	1.0
		VJ – 2032 Index-Linked Gilt Fund	Yes	2.0
		YB – 2040 Index-Linked Gilt Fund	Yes	2.0
	Total			
Overall expected return above gilts*				0.55% pa
Target interest rate hedge ratio relative to the long term solvency target				92.5%
Target inflation hedge ratio relative to the long term solvency target				92.5%

*The estimates shown are from analysis dated 30 April 2025

2. Rebalancing events

The Trustee has agreed that any cash flows for investment/disinvestment will be directed towards and taken in the following proportions:

- Vontobel TwentyFour Absolute Return Credit Fund (50%)
- L&G VH - 2049 Gilt Fund (30%)
- L&G Y - All Stocks Index-Linked Gilts Index Fund (20%)

The fund allocations will be reviewed periodically in order to ensure the allocation to the credit funds remains sufficient to meet the Fund's requirements. The Trustee may decide to change this investment/disinvestment cash flow policy and/or rebalance the asset allocation from time-to-time, subject to receiving the required written investment advice. As there is no automatic rebalancing between the remaining funds, the actual asset allocation will drift out of line with the strategic asset allocation. The Trustee regularly monitors the actual asset allocation and will consider whether any rebalancing is required from time-to-time.

The long-term solvency liability is calculated using a gilts + 0% discount rate (plus a fixed £1.5m expense allowance) as this is expected to be a reasonably realistic proxy for the cost of insuring the liabilities of the Fund when the Fund has matured.

A hedge ratio is a measure of the level of protection the Fund has against changes in longer-term interest rates/inflation expectations. Both of these risks originate from the nature of the Fund's liabilities. For example, with an interest rate hedge ratio of 92.5%, if a fall in longer term interest rates results in a £10m increase in the liability value, then the protection assets are expected to rise by £9.25m to compensate (within practical constraints and ignoring some potential residual basis risks). This simplified example assumes financial market conditions are otherwise stable (for example, no change in equity markets). In practice, due to other risk factors, the overall asset value may rise by more or less than stated (or fall).

The Trustee may (in accordance with the Trust Deed and Rules) purchase an annuity or assurance contract to fund any benefits payable under the Fund.