The Thomson-Leng Provident Fund (DC Section)

Statement of Investment Principles

September 2026

1. Introduction

The Trustee of the Thomson-Leng Provident Fund DC Section ("the DC Section") has prepared this Statement of Investment Principles ("the Statement") to comply with the requirements of:

- The Pensions Act 1995, as amended by the Pensions Act 2004;
- The Occupational Pension Schemes (Investment) Regulations 2005, as amended by the Occupational Pension Schemes (Charges and Governance) Regulations 2015; and,
- Subsequent legislation.

The Statement sets out the principles that govern the decisions about the investment of the DC Section's assets. A separate document entitled "Investment Policy Implementation Document" detailing the specifics of the DC Section's investment arrangements is available upon request.

In preparing this Statement, the Trustee has consulted with the sponsoring employer, DC Thomson & Company Limited, and obtained and considered written professional advice from Mercer Limited ("Mercer"), the DC Section's investment consultant, regarding the DC Section's investment strategy. The advice received and arrangements implemented are, in the Trustee's opinion, consistent with the requirements of Section 36 of the Pensions Act 1995 (as amended).

The DC Section is a contracted-in defined contribution arrangement with Mercer Workplace Savings ("MWS"), via the Trustee's long-term insurance policy with Mobius Life ("Mobius"), the DC Section's investment platform provider.

The Trustee believes that the objectives and policies set out in this Statement ensures that the DC Section's assets are invested in the best interests of the members and beneficiaries of the DC Section.

2. Investment Objectives

The Trustee recognises that members have differing investment needs and that these may change during the course of a member's working life. The Trustee also recognises that members have different attitudes to risk. The Trustee believes that members should make their own investment decisions based on their individual circumstances.

In order to encompass these factors, the Trustee has agreed the following objectives:

- To make available a range of investment funds that should enable members to tailor their own investment strategy to meet their own individual needs.
- To offer funds which allow diversification of risk and long-term capital growth.
- To provide a default investment option for members who do not make their own investment decisions.

MWS offers investment funds via the Mobius platform, from which the Trustee has selected a range of investment funds to offer to members to invest their contributions. MWS, as the delegated investment manager, is responsible for making decisions on asset allocation, selection, appointment, removal and monitoring of underlying investment managers.

3. Risk Management

The Trustee recognises that there are a number of risks facing members of the DC Section and have taken these into consideration when determining the range of investment funds to offer to members. The Trustee has considered risk from a number of perspectives. These are:

<table>
<tr><th colspan="2">Type of Risk</th><th>Description</th><th>How is the risk monitored and managed</th></tr>
<tr><td rowspan="2">Market risks</td><td colspan="2">The management of the market risks below are all monitored and managed in line with the principles stated here.
Specific monitoring and management is set out below.</td><td>Members are able to set their own investment allocations, in line with their risk tolerances.
MWS governed investment funds are considered to have adequate diversification across asset class, region and within each asset class. Management of these funds is the responsibility of MWS and Mercer.
Within active funds, management of many of these risks is the responsibility of the external investment manager. The Trustee monitors the MWS governed funds.
The Trustee regularly reviews performance of the funds.</td></tr>
<tr><td>Inflation risk</td><td>The risk that investment returns do not keep pace with inflation and does not, therefore, secure an adequate pension.</td><td>The Trustee makes available a range of funds, across various asset classes, with the majority expected to keep pace with inflation.
The Trustee considers the real returns expected from the various asset classes. The default investment option has an explicit allocation to assets which are expected to outperform inflation over the longer term.</td></tr>
</table>

Type of Risk		Description	How is the risk monitored and managed
Market Risks (cont.)	Currency risk	The risk that investment in overseas markets will be affected by changes in exchange rates leading to lower returns in pound sterling terms.	The Trustee provides diversified investment options that invest in local and overseas markets and currencies.
	Credit risk	The risk that the issuer of a financial asset, such as a bond, fails to make the contractual payments due.	Within active funds, management of this risk is the responsibility of the external investment manager. The Trustee monitors the MWS governed funds.
	Equity, property and other risks	Risks additional to those above where the income or the capital value of an asset is uncertain owing to, for example, changes in the profitability of an issuing company.	Within active funds, management of many of these risks is the responsibility of the external investment manager. The Trustee monitors the MWS governed funds.
Environmental, Social and Corporate Governance risk		The risk that environmental, social or corporate governance factors (including climate change) have a material financial impact on the return of DC Section assets.	See Section 6 of this Statement for the Trustee's responsible investment and corporate governance statement.
Investment Manager risk		The risk that an investment manager underperforms the expectations of the Trustee, fails to carry out operational tasks, does not ensure safe-keeping of assets or breaches agreed guidelines.	For the external funds the Trustee considers advice from their investment adviser. MWS takes responsibility for the management of this risk for the MWS governed funds. The Trustee monitors the performance of the investment vehicles on a quarterly basis to ensure the Investment Managers are meeting expectations.

Type of Risk	Description	How is the risk monitored and managed
Liquidity risk	The risk that the pooled funds, through which the Trustee allows members to invest, do not provide the required level of liquidity.	This is measured by the dealing and pricing frequencies of pooled funds. The Trustee accesses pooled funds via an investment platform, which is expected to provide daily pricing and liquidity.
Pension Conversion risk	The risk that the member is invested in a strategy that does not reflect the way in which they intend to take their benefits at retirement.	The Trustee makes available three target date fund strategies for members which automatically switch member assets into investments whose value is expected to be less volatile relative to how the member wishes to access their pension savings as they approach retirement age. The asset allocation and management of these target date fund strategies is the responsibility of MWS. Members can select a target date fund strategy in accordance with their personal preferences and retirement objectives. The default investment option is a target date fund strategy which automatically switches member assets as they approach retirement age into investments expected to be appropriate to support pension drawdown with 90% of assets invested in the specialist Mercer Diversified Retirement Fund and 10% in the Mercer Active Money Market Fund at retirement. As part of the triennial default review, the Trustee ensures the default destination remains appropriate.

The risks identified in the table above are considered by the Trustee to be 'financially material considerations'. The Trustee believes the appropriate time horizon for which to assess these considerations within should be viewed at a member level. This will be dependent on the member's age and their selected retirement age. It is for this reason that a number of retirement strategies targeting the various outcomes at retirement have been made available to members.

4. Investment Strategy

4.1 Range of Funds

The Trustee is responsible for deciding the range of funds to offer but has no influence on the investment aims of each fund or how the investment managers choose the underlying investments within the funds as the assets are pooled with other investors. Notwithstanding how the assets are managed, the Trustee has taken investment advice regarding the suitability of the relevant investment vehicles.

The Trustee makes available a range of investment funds for the DC Section which they believe provide appropriate strategic choices for members' different saving objectives, risk profiles and time horizons. Each fund used in the DC Section has a benchmark and/or target return that the Trustee considers to be the expected return for that fund. Members themselves determine the fund(s) in which they choose to invest. As members are able to make their own investment decisions, the balance between the different kinds of investments can be their decision. This balance will determine the expected return on a member's assets.

Members who do not make a decision are invested in the default investment option which is a target date fund strategy designed for members intending to take their benefits at retirement via pension drawdown. Members' assets are automatically de-risked within the target date fund as they approach retirement. More information on the default strategy is included in section 4.2.

In addition, two alternative target date fund strategies are available for members that reflect the alternative ways in which members can take their benefits at retirement (annuity or cash). Assets will be switched into investments which seek to more closely match how the member wishes to access their pension savings as they approach retirement.

The Trustee also offers members a choice of investment funds. The Trustee believes that the fund range offered to members is consistent with the investment objectives outlined in section 2 and the risks outlined in section 3. The funds offered are classified as High Growth, Growth, Diversified Growth, Moderate Growth, Defensive, Active Global Equity, Passive Sustainable Global Equity, Shariah and Active Money Market. The underlying asset allocation of these funds will vary but many include UK equities, global equities, fixed income bonds, index-linked bonds, cash and alternative assets, such as property. The delegated investment manager is responsible for making decisions on asset allocation, selection, appointment, removal and monitoring of underlying external investment managers in these funds. Details of the funds, including benchmarks and targets, are set out in the document entitled "Investment Policy Implementation Document".

The Trustee regularly obtains professional advice, and monitors and reviews the suitability of the funds provided. As a result, the Trustee may change the investment options from time to time.

4.2 Default Investment Option

For members who do not wish to take an active role in their investment decisions, the Trustee offers a **default investment option** which includes automatic de-risking of investments. The default investment option is currently the Target Drawdown Retirement Path. It is designed to be suitable for members who plan to access their benefits via pension drawdown at retirement.

Aims and Objectives of the default investment option

The aims of the default investment option, and the ways in which the Trustee seeks to achieve these aims, are detailed below:

- To generate returns in excess of inflation during the growth phase of the strategy whilst managing downside risk.

  The default investment option's multi-stage growth phase invests in equities and other growth-seeking assets through underlying multi-asset funds. These investments are expected to initially target higher growth before gradually increasing diversification to reduce investment return volatility while still targeting returns above inflation.

- To provide a strategy that reduces investment risk for members as they approach retirement.

  As a member's pension savings grow, investment risk will have a greater impact on member outcomes. Therefore, the Trustee believes that a strategy that seeks to reduce investment risk as the member approaches retirement is appropriate. Moreover, as members approach retirement, the Trustee believes the primary aim should be to provide protection against a mismatch between asset values and the expected costs of retirement benefits.

  In view of the above, the Trustee considers the level of risk within the default investment option in the context of the variability of returns relative to cash rates.

- To provide exposure, at retirement, to assets that are broadly appropriate for an individual planning to access their benefits via pension drawdown.

- By the end of a member's target retirement year, 90% of the member's assets will be invested in the specialist Mercer Diversified Retirement Fund that aims to provide a degree of growth and protection against changes in market values, allowing members to remain invested beyond retirement, and 10% in the Mercer Active Money Market Fund.

Policies in relation to the default investment option

- The default investment option manages investment and other risks throughout a member's lifetime via a strategic asset allocation consisting of equities, multi-asset funds, growth fixed income, corporate bonds and cash. Risk is not considered in isolation, but in conjunction with expected investment returns and outcomes for members.

- In selecting the default investment option, the Trustee has explicitly considered the trade-off between risk and expected returns.

- Assets in the default investment option are invested in a manner which aims to ensure the security, quality, liquidity and profitability of a member's portfolio as a whole.
- The investment manager has responsibility for buying and selling the underlying assets. All of the pooled funds used within the DC Section and the default investment option operate daily dealing cycles.
- Assets are invested mainly on regulated markets.
- The Trustee has considered investment risk from a number of perspectives. The risks (and how they are measured and managed) set out in Section 3 of this Statement are also applicable to the default investment option.
- The items set out in Section 3 of this Statement are also those that the Trustee considers to be financially material considerations in relation to the default investment option. The Trustee believes that the appropriate time horizon within which to assess these considerations should be viewed at the member level. This will be dependent on the member's age and when they expect to retire.
- The Trustee's policy in relation to Environmental, Social and Corporate Governance factors, stewardship and Climate Change for the default is in line with the main DC Section and is set out in section 6.
- The Trustee's policy in relation to illiquid assets:
    - The Trustee considers illiquid assets as assets of a type which cannot easily or quickly be sold or exchanged for cash; including where such assets are invested as a component of a daily-dealing multi-asset fund. The Fund's default strategy does not include a direct allocation to illiquid investments or to investments via a collective investment scheme. The default investment option invests in the Mercer Long Term Growth, Mercer Growth Fund and Mercer Diversified Retirement Fund, which are multi-asset funds that do not currently invest in any underlying illiquid assets.
    - The Trustee understands the potential for higher returns and benefits of diversification that illiquid investments can offer relative to more traditional asset classes (such as equities or bonds). While these benefits are recognised by the Trustee, it is also aware of the risks associated with these investments, for example illiquidity and active manager risk. The Trustee acknowledges investment in illiquid assets is a developing area for defined contribution pensions, and expects the delegated investment manager to monitor the position closely and continue to evaluate the suitability of such an investment.
    - In selecting investments for the default investment option, the Trustee uses modelling to consider the expected impact of different strategic asset allocation mixes on projected member savings. For any future investment, the Trustee will carefully consider whether the investment provides value for members, taking into account the potential for returns and associated risks. It is the Trustee's policy to review the allocation of the default investment option on a triennial basis, and they

expect the delegated investment manager to review on an annual basis. The delegated investment manager has confirmed that such reviews will include whether the incorporation of illiquid asset investments is appropriate.

Suitability of the default investment option

- Based on the Trustee's understanding of the DC Section's membership, an investment strategy that targets pension drawdown at retirement is expected to be appropriate to meet a typical member's requirements for income in retirement. This is because:
  - Members seeking an adequate income in retirement will likely need to achieve real investment returns for most of their period as pension savers. The use of a fund with significant weightings in global equities during the accumulation phase addresses that requirement.
  - The Trustee believes that most members who save into a pension plan wish to be able to access their assets flexibly at retirement, giving the member the choice of how and when they choose to withdraw their pension savings.
  - The default arrangement is aimed largely at members who do not feel confident in taking investment decisions. Again, the Trustee believes that pension drawdown at retirement is likely to be the preferred course for such members.
  - Almost all members withdraw tax free cash at retirement. The use of the money market fund as part of the target date fund strategy addresses that requirement.

This does not mean that members have to take their benefits in this format at retirement, it merely outlines the investment strategy that will be in place prior to retirement. Members who intend to take their pension savings in other forms have the option of choosing their own investment strategy.

The Trustee believes that the current default investment option is appropriate and will continue to review this regularly, and more strategically at least triennially, or after any significant changes to the DC Section membership, if sooner.

The Trustee reviews investment performance and risk on a quarterly basis and takes professional advice as appropriate.

The Trustee believes that this strategy meets the investment objective outlined in section 2 and controls the risks identified in section 3.

4.3 Additional Default Arrangements

The Trustee made a number of changes to the self-select fund range in May 2019 as part of the transition to the MWS fund range. As a result of the fund mapping exercise that accompanied these changes and since the Trustee did not obtain or require consent from members for these switches, the following funds are also default arrangements:

Mercer Growth Fund

Mercer High Growth Fund
Mercer Moderate Growth Fund
Mercer Defensive Fund
Mercer Diversified Growth Fund
Mercer Active Money Market Fund

The Trustee's policies in relation to these Additional Default Arrangements are in line with the risks (where applicable) set out in Section 3.

5. Day-to-Day Management of the Assets

5.1 Main Assets

The day-to-day management of the funds offered to members is delegated to professional investment managers selected and monitored by MWS. Details of the day-to-day management of the assets are set out in the document entitled "Investment Policy Implementation Document".

5.2 Additional Voluntary Contributions (AVCs)

Members of the DC Section are able to invest AVCs within the same investment funds as the main DC Section assets.

The Trustee has also delegated the responsibility for the investment arrangements of the AVC assets to MWS.

5.3 Monitoring the DC Section Provider

The Trustee uses Mercer's Investment Consulting business as investment consultants to advise on investment strategy, provider appointments, provide assistance in monitoring the funds available, both in the form of written reports and attendance at meetings.

Long term returns are expected to be in line with the performance objectives of each of the funds open to members.

5.4 Realisation of Investments

The investment managers have discretion in the timing of realisation of investments and in considerations relating to the liquidity of those investments within parameters stipulated in the relevant appointment documentation.

6. Responsible Investment and Corporate Governance (Voting and Engagement)

The Trustee applies the following beliefs to the whole DC Section including the Default Investment Option.

6.1 Financially material considerations

The Trustee believes that environmental, social, and corporate governance ("ESG") factors have a material impact on investment risk and return outcomes, and that good stewardship can create and preserve value for companies and markets as a whole. The Trustee also recognises that long-term sustainability issues, particularly climate change, present risks and opportunities that increasingly require explicit consideration.

The Trustee has delegated manager selection and monitoring to MWS who in turn delegates responsibility for day-to-day management of the assets to a range of underlying investment managers. These investment managers are expected to evaluate ESG factors, including climate change considerations, and exercise voting rights and stewardship obligations attached to the investments, in accordance with their own corporate governance policies and current best practice, including the UK Corporate Governance Code and UK Stewardship Code. Managers' engagement policies are expected to include all relevant matters including performance, strategy, capital structure, management of actual or potential conflicts of interest, risks, social and environmental impact and corporate governance.

The Trustee considers how ESG, climate change and stewardship is integrated within Mercer's investment processes and those of the underlying managers in the monitoring process. The Trustee believes that Mercer has the necessary expertise and framework in place to effectively manage and monitor investments in line with these areas, and this is implemented through their four pillar framework: integration, stewardship, thematic investment and screening. The investment funds of the DC Section incorporate these four pillars as far as is practical. Mercer is expected to provide reporting on a regular basis, at least annually, on ESG integration progress, stewardship monitoring results, and climate-related metrics such as carbon footprint for equities and/or climate scenario analysis for diversified portfolios.

6.2 Member views – Non-financial matters

The views of members and other beneficiaries in relation to ethical considerations, social and environmental impact, or present and future quality of life, are taken into account regarding the range of funds made available within the DC Section and the Trustee may offer funds in line with the members' views in the future.

7. Arrangements with asset managers

The Trustee accesses the Investment Manager's products (or funds) through the Mobius investment platform. The delegated investment manager appoints underlying investment managers and the Trustee may select funds from external investment managers based on their capabilities, and therefore the perceived likelihood of achieving the expected return and risk characteristics required. Mercer's manager research rating reflects Mercer's forward-looking assessment of a manager's ability to meet or exceed their objectives. As the Trustee invests in pooled or multi-client investment vehicles they accept that they have limited ability to influence the Investment Managers to align their decisions with the Trustee's policies set out in this Statement. However, appropriate mandates can be selected to align with the overall investment strategy.

The Trustee and delegated investment manager expects all underlying investment managers to incorporate the consideration of longer term factors, such as ESG, into

their decision making process where appropriate. The extent to which this is so will be considered by the delegated investment manager during the selection, retention and realisation of manager appointments. Voting and engagement activity should be used by investment managers to discuss the performance of an issuer of debt or equity. The delegated investment manager engages with underlying investment managers on this activity and if dissatisfied will look to replace the manager.

The Trustee's focus is on longer-term performance but shorter-term performance is monitored to ensure any concerns can be identified in a timely manner. The Trustee reviews both absolute and relative performance of funds available to members on a quarterly basis, including assessments of both shorter and longer time horizons. The Trustee and the delegated investment manager also rely upon Mercer's manager research capabilities. The remuneration for Investment Managers used by the Fund is based on assets under management; the levels of these fees are reviewed annually as part of the annual value for member assessment to ensure they continue to represent value for members. If fund performance is not satisfactory, the Trustee will request an explanation of performance and process from MWS. If not satisfied with this, the Trustee may request further action be taken, including a review of fees.

Portfolio turnover costs for each of the funds are considered on an annual basis as part of the annual value for members assessment. The ability to assess the appropriateness of these costs is limited by the availability of industry-wide data. The Trustee will monitor industry developments in how to assess these costs and incorporate this in future value for member's assessments. Importantly, performance is reviewed net of portfolio turnover costs.

The Trustee is a long term investor; all funds are open-ended and therefore there is no set duration for manager appointments. The delegated investment manager is responsible for the selection, appointment, monitoring and removal of the underlying investment managers. The Trustee may also choose to remove a fund from the fund range, if no longer considered appropriate. The fund range is formally reviewed on at least a triennial basis.

8. Review of this Statement

The Trustee will review this Statement at least once every three years and after any significant change in investment policy. Any change to this Statement will only be made after having obtained and considered the written advice of someone who the Trustee reasonably believes to be qualified by their ability in and practical experience of financial matters and to have the appropriate knowledge and experience of the management of pension scheme investments.

Signed: *CHW Thomson*

For and on behalf of DC Thomson & Co Pension Trustee Limited

Dated: *28th October 2026*