

The William Jackson Pension Plan

Statement of Investment Principles – January 2026 (replaces April 2025)

1. Introduction

The Trustee Directors (“Trustees”) of the William Jackson Pension Plan (“the Plan”) have drawn up this Statement of Investment Principles (“the Statement”) to comply with the requirements of the Pensions Act 1995 (“the Act”), and associated legislation including the Occupational Pension Schemes (Investment) Regulations 2005. The Statement is intended to affirm the investment principles that govern decisions about the Plan’s investments. The Trustees’ investment responsibilities are governed by the Plan’s Trust Deed and Rules, of which this Statement takes full regard.

In preparing this Statement, the Trustees have consulted a suitably qualified person by obtaining written advice from Mercer Limited (“Mercer”). In addition, consultation has been undertaken with William Jackson Food Group (the “Sponsor”) to ascertain whether there are any material issues of which the Trustees should be aware in agreeing the Plan’s investment arrangements and, in particular on the Trustees’ objectives.

2. Process For Choosing Investments

In considering the appropriate investment arrangements for the Plan the Trustees have obtained and considered the written advice of Mercer as their investment consultant, whom the Trustees believe meets the requirements of Section 35(5) of the Pensions Act 1995 (as amended) and to be suitably qualified to provide such advice. The advice received and arrangements implemented are, in the Trustees’ opinion, consistent with the requirements of Section 36 of the Pensions Act 1995 (as amended).

In December 2025, the Trustees undertook a “buy-in”, using the majority of the Plan’s assets to purchase a bulk annuity insurance policy with Aviva Life & Pensions UK Limited (“Aviva”), a UK insurance company authorised by the Prudential Regulation Authority (“PRA”) and regulated by the Financial Conduct Authority (“FCA”). Under the annuity insurance policy, Aviva will, via the Plan, pay the Plan’s benefit obligations to members as they fall due as specified in the policy. The Trustees agreed to purchase the policy with Aviva having considered appropriate advice from their advisors.

With the exception of AVCs, the residual Plan assets are invested in a multi-client collective investment scheme (“Mercer Fund”) managed by a management company Mercer Global Investments Management Limited (“MGIM”). MGIM has appointed Mercer Global Investments Europe Limited (“MGIE”¹.) as investment manager for Mercer Fund. The Plan will allocate the residual assets in the MGI UK Cash Fund, which is intended to fund ongoing expenses until wind-up. Day to day investment of the underlying assets is conducted by one or more sub-investment managers at MGIE’s discretion.

The Trustees have also taken advice from Mercer in relation to the Plan’s AVCs.

3. Investment Objectives

The investment objectives set out here are those that the Trustees determine to be

financially material considerations in relation to the Plan.

The Trustees' primary objective is to act in the best interest of the members and ensure that the obligations to the beneficiaries of the Plan can be met. The Trustees believe the best way of achieving this is by securing all members' benefits with an insurance company and as such, the Trustees have secured a buy-in with Aviva, and are considering transferring the responsibility for all benefit payments to Aviva through a "buy-out" of the Plan's liabilities over the next one to two years.

Prior to wind-up, additional payments or expenses will be met from cash balances and/or payments from the Sponsor.

Given the Trustees' objectives, while members will continue to receive payments in the long term, the Trustees' investment horizon is short (up to two years) if a buy-out takes place.

4. **Risk Management and Measurement**

There are various risks to which any pension plan is exposed and which are considered to be financially material to the Plan over its anticipated lifetime. The Trustees' policy on risk management is as follows:

The primary risk upon which the Trustees focus is that arising through a mismatch between the Plan's assets and its liabilities. This risk has materially reduced through the purchase of the bulk annuity policy but the Trustees acknowledge a number of risks remain, including but not limited to:

- **Counterparty risk** – the risk that Aviva may default on its obligations under the bulk annuity policy. Before entering into the bulk annuity contract, the Trustees obtained and carefully considered professional advice regarding the financial strength of Aviva. The Trustees accepted the advice, namely that Aviva was financially strong and had sufficient capital resources to support the proposed transaction and that, correspondingly, there was no reason in relation to financial strength why the transaction should not proceed. In addition, the Trustees are aware that there is a level of protection offered to members by the Financial Services Compensation Scheme ("FSCS").
- **Liquidity risk** – an annuity is an illiquid investment and the Trustees do not expect to be able to liquidate it. However, the purpose of an annuity is to meet benefits as they fall due, hence the lack of liquidity is not a material concern. Residual cash provides good liquidity for ongoing cashflows up to the point of buy-out, e.g. to meet Plan expenses.
- **Lack of diversification** – The Trustees recognise that entering into an annuity contract with a single provider represents a potential concentration of risk. However, the Trustees are satisfied that this risk is acceptable after due diligence on the provider.

Other factors considered by the Trustees include:

- The Plan's residual assets will be invested in the MGI UK Cash Fund, which is exposed to small amounts of interest rate risk and credit risk. The aim of the fund is to earn interest while providing a high degree of capital preservation and good liquidity.

- Regulations require that investment in securities is predominantly in investments traded on regulated markets (whether held directly or via a pooled fund). Accordingly, the Trustees aim to invest the residual assets on regulated markets or markets which display the characteristics of a regulated market (for example in terms of liquidity and transparency). Recognising the potential risks of dealing in securities on unregulated markets (in particular liquidity and counterparty exposure), the Trustees expect that the Plan's appointed managers will normally only make such investments with the purpose of reducing risk or to facilitate efficient portfolio management. In addition, such investments should only be made to the extent they are consistent with the Trustee's wider objectives in terms of risk, return and liquidity.
- To help diversify manager-specific risk, within the context of the residual assets in the MGI UK Cash Fund, the Trustees expect that the Plan's assets to be managed by appropriate underlying asset managers.
- Considerations specific to Environmental, Social and Governance ("ESG") issues are addressed in section 10.
- No direct investment in the Sponsor will be made by the Plan. As the Sponsor Company is not listed, no indirect investment is expected via pooled investments and any such investment would be very substantially below 5% of total assets.

Should there be a material change in the Plan's circumstances, the Trustees will review whether and to what extent the investment arrangements should be altered.

5. Investment Strategy

The Trustees, with advice from the Plan's Investment Consultant and the Plan Actuary, has reviewed the Plan's investment strategy in consultation with the Plan Sponsor. This review considered the Trustees' investment objectives and their ability and willingness to take risk.

The Trustees, following consultation with the Sponsor, agreed to purchase a bulk annuity policy issued by Aviva. Aviva is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

With the exception of AVCs, which are set out in 8. Below, the Trustees invest residual assets in a Cash fund, in order to provide capital preservation and liquidity to fund ongoing expenses and other cashflows not met by the annuity policy until the Plan is eventually wound-up.

6. Expected Return

An expected return on the bulk annuity has not been determined but is implicit in the price of the contract.

The MGI UK Cash Fund is expected to generate a return in excess of its benchmark which is the Sterling Overnight Index Average ("SONIA") rate.

7. Cashflow and Cashflow Management

The MGI UK Cash Fund is expected to be utilised to fund any cashflow requirements over and

above the cashflows received from the bulk annuity policy.

8. **Additional Voluntary Contributions (“AVCs”)**

Under the terms of the Trust Deed the Trustees are responsible for the investment of AVCs paid by members. The Trustees review the investment performance of the chosen providers on a regular basis and take advice as to the providers’ continued suitability. In establishing these arrangements the Trustees’ intention is to offer a limited range of investments that nonetheless will meet the needs of a typical member, and favour passive management over active management for AVCs where this is possible.

Members have the ability to invest their AVC pots through Scottish Equitable in the following funds:

Fund	Asset Class	Passive/Active
Aegon LGIM Global Equity (60:40) Index (BLK)	UK and Overseas equities	Passive
Aegon LGIM UK Equity Index (BLK)	UK Equity	Passive
Aegon BlackRock Long Gilt (BLK)	Fixed-Interest Gilts	Passive
Aegon BlackRock Index-Linked Gilt (BLK)	Index-Linked Gilts	Passive
Aegon BlackRock Cash (BLK)	Cash	Active
Aegon BlackRock Property (BLK)	Property	Active

9. **ESG, Stewardship, and Climate Change**

The Trustees believe that good stewardship and environmental, social and governance (“ESG”) issues may have a financially material impact on investment returns and that good stewardship can create and preserve value for companies and markets as a whole.

The Trustees have implicitly delegated consideration of ESG issues, engagement and stewardship obligations to Aviva in relation to the majority of Plan assets via a bulk annuity contract, and to MGIM in relation to the remaining invested assets. The annuity contract makes contractual payment to the Plan dependent only on the benefits payable under the contract. As a result, the Trustees have minimal direct exposure to risks arising from long-term sustainability issues, including climate change. They are however satisfied that Aviva apply due consideration to ESG issues in the investment of assets underlying the contract.

The asset manager(s) appointed to manage the Mercer Cash Fund are expected to evaluate ESG factors, including climate change considerations, and exercise voting rights and stewardship obligations attached to the investments (where relevant), in accordance with their own corporate governance policies and current best practice, including the UK Corporate Governance Code and UK Stewardship Code. Given investment in a Cash fund, the scope for ESG to be applied is however expected to be limited.

10. **Non-financially material considerations**

Non-financial matters are not taken into account in the selection, retention and realisation of

investments.

11. Investment Restrictions

The Trustees have not set any investment restrictions beyond those consistent with the investment strategy set out in 5 and 8.

12. Trustees' policies with respect to arrangements with, and evaluation of the performance and remuneration of, asset managers and portfolio turnover costs

The Trustees monitor, and evaluate, the performance and fees paid for asset management provided by the underlying managers appointed by MGIM and Scottish Equitable. Investment management fees are levied as a percentage of the assets held. As a result, both the MGIM underlying managers and Scottish Equitable are incentivised to perform well over the medium term, relative to target, and to offer a competitive fee so as to retain assets under management, noting that the combined impact of all investors in these multi-client vehicles provides an overall incentive for them to perform well.

MGIE reviews the fees payable to sub-investment managers managing assets invested in the Mercer Funds on a regular basis with any negotiated fee savings passed directly to the Plan. Mercer's, MGIE's, and the sub-investment managers' fees are outlined in a quarterly investment strategy report prepared for the Trustees, excluding performance-related fees and other expenses involved in the Mercer Funds not directly related with the management fee. Details of all costs and expenses are included in the Mercer Fund Supplements, the Report & Accounts and within the Plan's annualized MiFID II compliant Personalised Cost & Charges statement. The Plan's Personalised Cost & Charges statement also include details of the transaction costs associated with investment in the Mercer Funds.

13. Custody of assets

The role of a custodian is to ensure the safe keeping of the assets and facilitate all transactions entered into by the appointed investment manager.

Assets underlying pooled funds are subject to independent custodianship. However, the Trustees' entitlement is to units in the relevant pooled fund.

14. Review of this Statement

The Trustees monitor compliance with this Statement annually. The Trustees will also review this Statement at least once every three years and without delay 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 Trustees reasonably believe 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 Plan investments.