

**Portman Travel Group Pension Plan**  
**Statement of Investment Beliefs (“SIB”)**

**Purpose of this Statement**

This SIB has been prepared by the Trustee of the Portman Travel Group Pension Plan (the “Plan”). This statement sets out the principles governing the Trustee’s decisions to invest the assets of the Plan.

The Plan’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.

Details on the Plan’s investment arrangements are set out in the Investment Implementation Document (“IID”).

**Governance**

The Trustee of the Plan make all major strategic decisions including, but not limited to, the Plan’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 believes that its investment advisers, Isio, 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 Plan.

**Investment objectives**

The Trustee invests the assets of the Plan with the aim of ensuring that all members’ current and future benefits can be paid. The Plan’s funding position will be reviewed on an ongoing basis to assess the position relative to the funding target and whether the investment arrangements remain appropriate to the Plan’s circumstances. The Plan’s funding target is specified in the Statement of Funding Principles.

The Plan’s present investment objective is to achieve a return of around 1.8% per annum above the return on UK Government bonds.

**Investment strategy**

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

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

the strength of the sponsoring company's covenant. The Trustee considered the merits of a range of asset classes.

The Trustee recognises that the investment strategy is subject to risk, in particular the risk of a mismatch between the performance of the assets and the calculated value of the liabilities. This risk is monitored by regularly assessing the funding position and the characteristics of the assets and liabilities. The risk is managed by investing in assets which are expected to perform in excess of the liabilities over the long term, and also by investing in a suitably diversified portfolio of assets with the aim of minimising (as far as possible) volatility relative to the liabilities.

The assets of the Plan consist predominantly of investments which are traded on regulated markets.

### **Leverage and collateral management**

The Trustee will adhere to all relevant regulatory guidance and requirements in relation to leverage and collateral management within the Plan's liability hedging (LDI) portfolio.

The Trustee, via the Plan's implementation manager, have a stated collateral management policy / framework. The Trustee has agreed a process for meeting collateral calls should these be made by the Plan's implementation manager. The Trustee will review, and stress test this policy / framework over time.

### **Investment Management Arrangements**

The Trustee has appointed Schroders Investment Management ("Schroders") as the implementation manager and investment manager for the Plan's assets. Schroders is regulated under the Financial Services and Markets Act 2000.

All decisions about the day-to-day management of the assets have been delegated to the implementation manager via a written agreement. The delegation includes decisions about:

- Selection, retention and realisation of investments including taking into account all financially material considerations in making these decisions;
- The exercise of rights (including voting rights) attaching to the investments;
- Undertaking engagement activities with investee companies and other stakeholders, where appropriate.

The Trustee takes investment managers' policies into account when selecting and monitoring managers. The Trustee also takes into account the performance targets the investment managers are evaluated on. The investment managers are expected to exercise powers of investment delegated to them, with a view to following the principles contained within this statement, so far as is reasonably practicable.

The investment managers' remuneration is based upon a percentage value of the assets under management.

As the Plan's assets are invested in pooled vehicles, the custody of the holdings is arranged by the investment manager.

## Investment Manager Monitoring and Engagement

The Trustee monitors and engages with the Plan's investment managers and other stakeholders on a variety of issues. Below is a summary of the areas covered and how the Trustee seeks to engage on these matters with investment managers.

Areas for engagement	Method for monitoring and engagement	Circumstances for additional monitoring and engagement
Performance, Strategy and Risk	The Trustee receives a quarterly performance report from the implementation manager which details information on the underlying investments' performance, strategy and market data, which are considered at the relevant Trustee meeting.	There are significant changes made to the investment strategy. Underperformance vs the performance objective over the period that this objective applies.
Environmental, Social, Corporate Governance factors and the exercising of rights	The Trustee's investment managers provide annual reports on how they have engaged with issuers regarding social, environmental and corporate governance issues. The Trustee receives information from its investment advisers on the investment managers' approaches to engagement. The Trustee will engage, via its investment adviser, with investment managers and/or other relevant persons about relevant matters at least annually.	The manager has not acted in accordance with their policies and frameworks. The manager's policies are not in line with the Trustee's policies in this area.

Through the engagement described above, the Trustee will work with its investment advisors and/or managers to improve their alignment with the above policies. Where sufficient improvement is not observed, the Trustee will review the relevant investment manager's appointment and will consider terminating the arrangement.

## 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 Plans (Investment) Regulations 2005 except where the Plan invests in collective investment Plans that may hold employer-related investments. In this case, the total exposure to employer-related investments will not exceed 5% of the Plan's total value. The Trustee will monitor this on an ongoing basis to ensure compliance.

**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 its investment advisers.

**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. The Trustee understands that the Plan is exempt from the requirement to prepare a statement of investment principles due to the size of the membership. This SIB is therefore being prepared voluntarily and will be reviewed periodically.

**Signed:**

**Date: 30 January 2025**

## Appendix A – Risks, Financially Material Considerations (including ESG and climate change) 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:

Risks	Definition	Policy
Investment	The risk that the Plan's position deteriorates due to the assets underperforming.	Selecting an investment objective that is achievable and is consistent with the Plan's funding basis and the sponsoring company's covenant strength. Investing in a diversified portfolio of assets.
Funding	The extent to which there are insufficient Plan assets available to cover ongoing and future liability cash flows.	Funding risk is considered as part of the investment strategy review and the actuarial valuation. The Trustee will agree an appropriate basis in conjunction with the investment strategy to ensure an appropriate journey plan is agreed to manage funding risk over time.
Covenant	The risk that the sponsoring company becomes unable to continue providing the required financial support to the Plan.	When developing the Plan's investment and funding objectives, the Trustee takes account of the strength of the covenant ensuring the level of risk the Plan is exposed to is at an appropriate level for the covenant to support.

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

Risk	Definition	Policy
Interest rates and inflation	The risk of mismatch between the value of the Plan's assets and present value of liabilities from changes in interest rates and inflation expectations.	To hedge 100% of interest rate and inflation risks on a Technical Provisions basis.
Liquidity	Difficulties in raising sufficient cash when	To maintain a sufficient allocation to liquid assets so that there is a prudent

	required without adversely impacting the fair market value of the investment.	buffer to pay members benefits as they fall due (including transfer values), and to provide collateral to the LDI manager.
Market	Experiencing losses due to factors that affect the overall performance of the financial markets.	To remain appropriately diversified and hedge away any unrewarded risks, where practicable.
Credit	Default on payments due as part of a financial security contract.	To diversify this risk by investing in a range of credit markets across different geographies and sectors where possible.
Environmental, Social and Governance	Exposure to Environmental, Social and Governance factors, including but not limited to climate change, which can impact the performance of the Plan's investments.	To appoint managers who satisfy the following criteria, unless there is a good reason why the manager does not satisfy each criteria: 1. Has a Responsible Investment ('RI') Policy / Framework 2. ESG factors Implemented via Investment Process 3. A track record of using engagement and any voting rights to manage ESG factors 4. ESG specific reporting 5. UN PRI signatory
Currency	The potential for adverse currency movements to have an impact on the Plan's investments.	To invest in GBP denominated share classes where possible.
Non-financial	Any factor, saved from the above, that is not expected to have a financial impact on the Plan's investments.	Such non-financial matters are not taken into account in the selection, retention or realisation of investments.

## Appendix B

The Trustee has the following policies in relation to the investment management arrangements for the Plan:

<b>How the investment managers are incentivised to align their investment strategy and decisions with the Trustee's policies.</b>	As the Plan is invested in pooled funds, there is not scope for these funds to tailor their strategy and decisions in line with the Trustee's policies. However, the Trustee invests in a portfolio of pooled funds that are aligned to the strategic objective.
<b>How the investment managers are incentivised to make decisions based on assessments of medium to long-term financial and non-financial performance of an issuer of debt or equity and to engage with them to improve performance in the medium to long-term.</b>	The Trustee reviews the investment managers' performance relative to medium and long-term objectives as documented in the investment management agreements. The Trustee does not incentivise the investment managers to make decisions based on non-financial performance.
<b>How the method (and time horizon) of the evaluation of investment managers' performance and the remuneration for their services are in line with the Trustee's policies.</b>	The Trustee reviews the performance of all of the Plan's investments on a net of cost basis to ensure a true measurement of performance versus investment objectives.
<b>The method for monitoring portfolio turnover costs incurred by investment managers and how they define and monitor targeted portfolio turnover or turnover range.</b>	The Trustee does not directly monitor turnover costs. However, the investment managers are incentivised to minimise costs as they are measured on a net of cost basis.
<b>The duration of the Plan's arrangements with the investment managers</b>	<p>The duration of the arrangements is considered in the context of the type of fund the Plan invests in.</p> <ul style="list-style-type: none"><li>○ As all of the funds are open ended, the duration is flexible and the Trustee will from time-to-time consider the appropriateness of these investments and whether they should continue to be held.</li></ul>
<b>Voting Policy - How the Trustee expects investment managers to vote on its behalf</b>	The Trustee has acknowledged responsibility for the voting policies that are implemented by the Plan's investment managers on its behalf.

<p><b>Engagement Policy - How the Trustee will engage with investment managers, direct assets and others about 'relevant matters'</b></p>	<p>The Trustee has acknowledged responsibility for the engagement policies that are implemented by the Plan's investment managers on its behalf.</p> <p>The Trustee, via its investment advisers, will engage with managers about 'relevant matters' at least annually.</p>
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## **Portman Travel Group Pension Plan**

### **Investment Implementation Document ("IID")**

This Investment Implementation Document ("IID") covers the Portman Travel Group Pension Plan (the "Plan") and details the policy of the Trustees relating to the implementation of the Portman Travel Group's investment arrangements, based on the principles set out in the Plan's Statement of Investment Beliefs ("SIB") dated 30 January 2025.

#### **Investment strategy**

The Plan's current investment strategy is invested according to the following broad asset allocation:

<b>Asset Class</b>	<b>Asset Category</b>	<b>Proportion (%)</b>	<b>Expected Return (relative to fixed interested gilts, %)</b>
Liability Driven Investment (LDI) & Cash	Matching Assets	35.0	0.0
Diversified Growth Fund (DGF)	Growth Assets	35.0	3.5
Asset Backed Security (ABS)		30.0	2.0
<b>Total</b>		<b>100.0</b>	<b>1.8</b>

Notes: 10-year assumptions as at 30 June 2024 relative to Bank of England 10 Year Gilts (net of management fees).

The expected returns shown in the table above represent long-term expectations of asset classes as a whole. Short-term returns in some asset classes may exhibit considerable variability.

#### **Investment Structure and mandates**

The Trustee has appointed Schroders Investment Management ("Schroders") as the implementation manager for the Plan's assets. The investment strategy and underlying funds are summarised in the table below. Custody is undertaken within each pooled fund. Schroders is regulated under the Financial Services and Markets Act 2000.

<b>Investment Manager</b>	<b>Proportion %</b>
Schroders Matching Plus LDI & Liquidity Funds	35.0
Schroders Growth Bucket	35.0
Schroders ISF Securitised Credit Fund	30.0
<b>Total</b>	<b>100.0</b>

## Rebalancing and liquidity arrangements

At their own discretion and as soon as reasonably practicable, Schroders will seek to implement the following rebalancing actions if the target allocations or liability coverage falls outside the relevant rebalancing ranges detailed below.

Scenario	Policy	Rebalancing Range
Target liability coverage	If the interest rate and inflation sensitivity of the Matching Assets deviate beyond the rebalancing range, Schroders will rebalance the allocation to ensure the target liability coverage is maintained.	+/- 5%
Target allocation between Growth Assets and Matching Assets	If the actual allocations of total Growth Assets and Matching Assets are outside the rebalancing range, Schroders will seek to rebalance the total Growth Assets and the Matching Assets back to their target allocations.	+/- 5%
Intra Growth Asset allocation (e.g. between Growth Asset Funds)	If the actual allocations between Growth Asset Funds are outside the rebalancing range, Schroders will seek to rebalance the Growth Assets back to their target allocations.	+/- 5%

In addition to the above, to support the on-going liquidity requirements of the Matching Assets, Schroders will, at their discretion, switch units out of the Growth Asset Funds as applicable for units in the Matching Asset Funds and vice versa.

## Schroders (Platform Provider)

### Mandate target returns, objectives

Asset Class	Manager	Objective
LDI	Schroders	Liability matching
Diversified Growth Fund	Schroders	Target SONIA + 4.125% p.a. net of fees over 3-5 years
Asset Backed Securities	Schroders	Target 3-Month LIBOR + 2.0% p.a. gross of fees

Signed:

Date: 30 January 2025