Cushon Master Trust
Statement of Investment Principles

July 2026

Build a feel good future

Statement of Investment Principles

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Contents

1. Introduction

This document constitutes the Statement of Investment Principles (the “SIP”) required under Section 35 of the Pensions Act 1995 for the Cushon Master Trust (the “Scheme”). It describes the investment strategy being pursued by the Trustees of the Scheme (the “Trustees”) and complies with the Trustees’ understanding of the requirements of the Occupational Pension Schemes (Investment) Regulations 2005, Occupational Pension Schemes (Charges and Governance) Regulations 2015, the Pension Protection Fund (Pensionable Service) Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018, and the Pensions Regulator’s General Code of Practice in relation to governance of defined contribution (DC) pension schemes effective from March 2024 in force at the time of preparing this document.

The Trustees confirm that, before preparing this SIP, they have consulted with Cushon MT Limited (the “Company”) and taken appropriate advice from their advisers. The Investment Adviser is Isio Group Limited, and the Trustees’ primary Legal Adviser is Pinsent Masons LLP. From time to time the Trustees may engage other legal advisers to provide advice on specific aspects of the investment strategy on which they can rely.

The Trustees believe their advisers to be qualified by their ability and practical experience of financial and legal matters respectively and they have appropriate knowledge and experience of the management of the investment arrangements that the Scheme requires. The Trustees also confirm that they will consult with the Company and take advice from the relevant advisers as part of any review of this SIP. The Trustees also receive support and proposals from the Cushon Investment Office on the investment strategy.

The Trustees are responsible for the investment of the Scheme’s assets and arranging the administration of the Scheme. Where they are required to make an investment decision, the Trustees always receive advice from the relevant advisers first and they believe that this ensures that they are appropriately familiar with the issues concerned.

In accordance with the Financial Services & Markets Act 2000, the Trustees set general investment policy but have delegated the day-to-day investment of the Scheme’s assets to professional fund managers (the “Investment Managers”) using pooled funds held via an investment platform, in accordance with Section 34(2) of the Pensions Act 1995. The Investment Managers are authorised under the Financial Services & Markets Act 2000 to provide the expertise necessary to manage the investments of the Scheme competently and will comply with the requirements of Section 36 of the Pensions Act 1995.

Declaration

The Trustees acknowledge that it is their responsibility, with guidance from their advisers, to ensure the assets of the Scheme are invested in accordance with these principles.

Signed: Date: 08/07/2026

Chair of Trustees
For and on behalf of the Trustees of the Cushon Master Trust.

2. Governance

The Trustees are responsible for the governance and investment of the Scheme's assets. They consider that the governance structure set out in this SIP is appropriate for the Scheme as it allows the Trustees to make the important decisions on investment strategy, while delegating the day-to-day aspects to the Investment Managers or their advisers as appropriate. The responsibilities of each of the parties involved in the Scheme's governance are detailed below.

Trustees

The main investment related responsibilities of the Trustees include: -

a) Ensuring the Scheme meets all regulatory requirements.
b) Reviewing, at least triennially (or following significant changes to the investment strategy), or, in respect of default investment strategies, the membership profile, the content of this SIP and modifying it if deemed appropriate.
c) Reviewing the investment strategy for the Scheme in terms of providing one or more default investment strategy and a wider range of self-select funds from which members may choose to invest (see the Appendix for more details).
d) Assessing the quality of the performance and processes of the Investment Managers by means of regular reviews of the investment performance and other information, through meetings and written reports.
e) Monitoring compliance of the investment strategy with the SIP on an ongoing basis.
f) Appointing and dismissing Investment Managers.
g) Assessing the performance of their advisers.
h) Consulting with the Company when reviewing investment strategy issues.
i) Communicating to members as appropriate.
j) Making this SIP publicly available.

Investment Adviser

The Investment Adviser will be responsible for, among other things: -

a) Participating with the Trustees in reviews of this SIP.
b) Assisting the Trustees with reviewing the default investment strategies, alternative lifestyle strategies and self-select fund range.
c) Advising the Trustees of any changes in respect of the Investment Managers that could affect the interests of the Scheme.
d) Advising the Trustees of any changes in the investment environment that could either present opportunities or risks to the Scheme.
e) Undertaking reviews of the Scheme's investment strategy including reviews of the Scheme's structure, current Investment Managers, and selection of new Investment Managers as appropriate.

Legal Adviser

The Legal Adviser will be responsible for, among other things: -

a) Acting on the Trustees' instructions to ensure legal compliance including those in respect of investment matters.

The Trustees and their advisers also have responsibilities with respect to responsible investing and complying with the Trustees' reporting in accordance with The Occupational Pension Schemes (Climate Change Governance and Reporting) Regulations 2021 (the "Regulations"), which are based on the Task Force on Climate-related Financial Disclosures ("TCFD") recommendations. These are outlined in the Trustees' Responsible Investment Policy and Stewardship Policy.

3. Investment Beliefs

The Trustees have formulated a set of investment beliefs, which will be considered when developing the investment strategy to ensure that all decisions are consistent with these beliefs and are made in the interests of members. They will also form part of the investment governance reporting framework, which is used to monitor effective implementation and management of the investment funds on behalf of members. The Trustees' investment beliefs are as follows: -

- The Trustees' investment objective is to maximise returns for members adjusted for risk and inflation regardless of when and how they take their benefits.

- The Trustees will consider a broad range of opportunities when sourcing investments, including assets on regulated and unregulated markets, assets that are publicly and privately held, as well as different investment management styles. There may be times when certain types of investments offer better value, and the Trustees will seek to maximise these opportunities for the benefit of the members.

- There are some risks which can be rewarded, such as illiquidity, complexity, active management, and diversification. Some of these risks may be linked to responsible investment factors (such as climate change). The Trustees will seek exposure to these investment opportunities, provided they meet their investment objective and the cost of accessing the investment presents value for money for members.

- The Trustees believe that responsible, sustainable, and social impact investment opportunities can contribute to meeting their investment objective.

- The Trustees' investment beliefs apply to all asset classes and support the principles underlying the UN-backed Principles for Responsible Investing ("UNPRI") initiative. The Trustees will select and work with partners and other industry parties who share their beliefs.

- The Trustees will seek to obtain members' views and preferences through a variety of methods and take these into consideration when developing their investment beliefs over time, to the extent that to do so does not conflict with the Trustees' legal obligations and fiduciary duties as pension scheme trustees. The Trustees may also take members' views into consideration when choosing self-select options. Member investment choice will be provided through the self-select investment options for those members who wish to express different beliefs in how their pension pot is invested.

4. The Trustees' Commitments

Climate change poses a material financial risk to Scheme members. To this end, the Trustees offer default investment strategies which have lower greenhouse gas emissions than a typical UK Pension Scheme. The Trustees have also agreed to the following climate targets for their default investment strategies: -

1. The Trustees aim to secure access to detailed data to better measure portfolio exposure to transition and physical risks under credible climate scenarios, using non-linear models across public and private asset classes. By 2027, the Trustees target improved coverage for the growth stage of the default investment strategies and to incorporate risk-return resilience in portfolio design.

2. For the growth stage of the default investment strategies, the Trustees aim to maintain a portfolio that has a scope 1+2 carbon intensity (tCO2e/£m invested) approximately 60% lower, and up to 80% lower, than the composite benchmark as of 2022[1].

3. By 2030, the Trustees aim to avoid at least 500,000 tonnes of CO_2 emissions via investment in renewable infrastructure within the Cushon Sustainable Investment Strategy main default and Cushon Target Age Funds default, thus supporting the transition to a low-carbon economy and contributing to UK energy security.

The 2022 baseline is defined as the weighted average carbon footprint (scope 1 & 2 emissions) of broad market indices weighted by the growth phase asset allocation for each of the Cushon Sustainable Investment Strategy and Cushon Core Investment Strategy default investment strategies. For both strategies, this is: 90% Solactive GBS Global Markets Large and Mid-Cap, 2.5% Bloomberg Global Aggregate, 4.3% Bloomberg Global Aggregate Corporates and 3.2% 50 /50 ICE BoA Global High Yield / Global Investment Grade.

5. Investment Options

Implementation of investments

The Trustees have appointed Mobius Life Limited ("Mobius Life") as the investment platform provider for the pooled funds that make up the Scheme's investment options for members. These funds are then managed by the underlying Investment Managers which are detailed in the Appendix.

Member administration services are provided to the Trustees by MUFG Retirement Solutions Pension Administration (HS) Limited (trading as MUFG Retirement Solutions, "MUFG"). An administration platform is provided to the Trustees by Cushon Group Limited. Members' contributions will be invested in line with their selected choice of funds. Where a member has not made an active selection, their contributions will be invested in the default investment strategy applicable for their employer.

Range of investment options

In designing the investment options, the Trustees have considered members' changing risk and return requirements over time and member outcomes. The Trustees will ensure that each member's investments are invested in accordance with the fund options selected by the member, or in the absence of an investment choice, the relevant default investment strategy.

When implementing any changes to the investment strategy, the Trustees, in conjunction with their advisers, will look to mitigate the potential risks and costs to members as a result of any investment transitions to the best of their ability.

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[1] As reported in the Climate Change Report for the 2024 Scheme year, the previous target of an 80% reduction in carbon footprint (scope 1 & 2 emissions) compared with the 2022 baseline had been achieved. The Trustees have agreed updated targets as part of the work on the Climate Change report for the 2025 Scheme year.

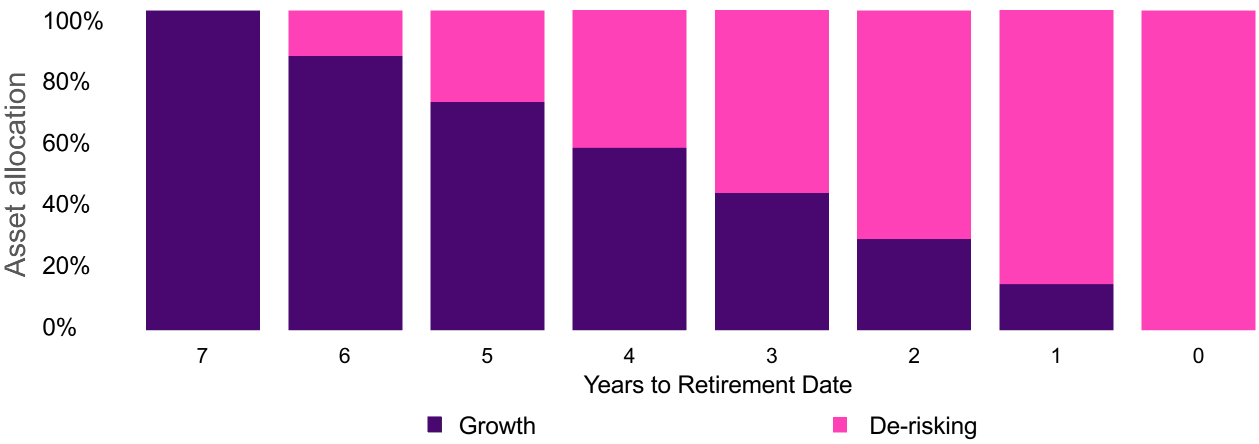
Default Investment Strategy

The Trustees offer a preferred default investment strategy, the Cushon Sustainable Investment Strategy, and an alternative default investment strategy, the Cushon Core Investment Strategy, for participating employers seeking a default investment strategy with lower investment management costs that has no allocation to private markets.

The default investment strategies have been selected in the best interest of the majority of members and beneficiaries, and the Trustees undertake periodic reviews on the suitability of the strategies. Further details on the default investment strategies are contained within the Appendix. The Cushon Sustainable Investment Strategy and Cushon Core Investment Strategy both target drawdown in retirement.

The Trustees' investment objective for the default investment strategies is to maximise returns for members adjusted for risk and inflation regardless of when and how they take their benefits.

Members who do not make a specific investment choice will be automatically invested in the relevant default investment strategy. This phases a member's assets through different funds as retirement approaches. The Cushon Sustainable Investment Strategy and Cushon Core Investment Strategy have the same de-risking profile, set out in the chart below. The Trustees define de-risking as when members move to an asset allocation with a lower expected risk level (measured by volatility) based on their long-term assumptions, although the Trustees recognise that actual volatility may under some market conditions differ from expected volatility.



On 16 February 2026 a bulk transfer was completed of all Creative Pension Trust members and assets into the Cushon Master Trust. The investment strategies and options for those members remained unchanged following the transfer as they were already largely aligned with the investment arrangements of the Cushon Master Trust.

For those former Creative Pension Trust members the main default investment strategy remains the Cushon Core Investment Strategy. In addition some former Creative Pension Trust members are invested in the alternative Cushon Target Age Funds default investment strategy. The Cushon Target Age Funds mirror the profile of the Cushon Sustainable Investment Strategy but in the form of a series of individual target date funds with vintages from 2030 to 2070, including the Cushon Retirement Ready Fund which replicates the at-retirement portfolio of the Cushon Sustainable Investment Strategy. The Cushon Target Age Funds are not available for new members.

Alternative Lifestyle Strategies

The Trustees also offer two alternative lifestyle strategy options, for both the Cushon Sustainable Investment Strategy and the Cushon Core Investment Strategy. The two alternative lifestyle strategies target either an annuity or cash at retirement and are available to members alongside the existing default Cushon Sustainable Investment Strategy and Cushon Core Investment Strategy which both target drawdown.

During the growth phase, members will be invested in the same growth assets as the corresponding Cushon Sustainable Investment Strategy or Cushon Core Investment Strategy default. For members within the Cushon Sustainable Investment Strategy default who select an alternative lifestyle strategy the Private Markets allocation is replaced by the BlackRock Market Advantage Fund. From seven years prior to the member's Target Retirement Age, the asset allocation of the member's investments begins to differ from the default investment strategies as they move towards their alternative de-risking lifestyle targets.

More information is provided in the Appendix. The Alternative Lifestyle Strategies will be available to former Creative Pension Trust members when they are migrated onto the Cushon administration platform, which is expected to take place before the end of 2026.

6. Trustees' Policies

The Trustees exercise their investment powers in a way that is intended to ensure the security, quality, reasonable liquidity and return profile of the portfolio as a whole. The Trustees' policies and objectives are intended to ensure that assets are invested in the best interest of members and beneficiaries. The default investment strategies have been selected in the best interest of the majority of members and beneficiaries. Cash and annuity targeting alternative lifestyle strategies allow members to target particular retirement choices. There are also a range of self-select options to allow each member to choose a different mix of investments based on their requirements.

The Trustees' investment objective is to maximise returns for members adjusted for risk and inflation regardless of when and how they take their benefits. As explained in other sections, the Trustees give consideration to a range of investment opportunities in order to achieve their objectives, including responsible and private market investments. These support the Trustees in ensuring the security, quality, reasonable liquidity and return profile of the portfolio as a whole and are appropriate for different categories and demographics of members.

The balance between different kinds of investments

The balance between different kinds of investments is shown in the Appendix. The choice of investment options for members is designed to ensure that members can choose investments that are adequately diversified and suitable for their profile.

The Trustees monitor the investment options regularly to ensure that they are comfortable with the choice of funds offered to members. The Trustees are satisfied that, taken in aggregate, the funds offered are appropriate for different categories and demographics, including various ages and retirement plans of members.

Realisation of investments

The Trustees prioritise daily dealing for members' investments. Funds used within the default investment strategies are unit linked pooled funds. This means that the money invested by members is pooled together with other investors and invested in a collective investment. All of the funds are subject to daily dealing, other than the private markets allocation within the Cushon Sustainable Investment Strategy and Cushon Target Age Funds which is subject to a quarterly dealing cycle. The Trustees have an agreed process to manage the liquidity to allow for the quarterly dealing of the private markets allocation, whilst still maintaining daily dealing for members in the defaults.

If an Investment Manager no longer meets the Trustees' selection criteria, the Trustees could choose to realise (sell) the investment fund.

Security of assets

The Scheme's assets are held on the Mobius Life platform via an insurance policy called a Trustee Investment Plan. Mobius Life is a regulated Life Insurance Company and the Prudential Regulatory Authority ("PRA") and Financial Conduct Authority ("FCA") regulate the types of investment funds permitted on the platform.

As a regulated insurance company, Mobius Life is subject to substantial regulatory capital (solvency) requirements, which are subject to regular reporting to the PRA. Policyholders can make a claim for compensation from the Financial Services Compensation Scheme ("FSCS") in the event of Mobius Life defaulting, and Professional Indemnity Insurance is in place to cover operational risks and fraud.

Further details can be found in Mobius Life's Security of Assets policy.

Financial and non-financial material investment considerations

The Trustees consider financial factors including, but not limited to, Environmental, Social and Governance ("ESG") issues in respect of the investment options provided. All references to ESG relate to financial factors only and include climate change. Further details of how these considerations are taken into account are discussed below under the "Responsible Investment" and "Stewardship" sections.

The Trustees do not at present take into account non-financially material factors (such as members' ethical considerations or other views) when making investment decisions as part of the default investment strategies.

The Trustees will seek to obtain members' views and preferences and take these into consideration when developing their investment beliefs over time, to the extent that to do so does not conflict with their legal obligations and fiduciary duties as pension scheme trustees. The Trustees may also take members' views into consideration when choosing self-select options. Member investment choice (such as a Shariah compliant option) will be provided through the self-select investment options for those members who wish to express different beliefs in how their pension pot is invested.

Responsible investment

The Trustees define responsible investment ("RI") in line with the UNPRI, which states that RI is an approach to investing that aims to incorporate ESG factors into investment decisions, to better manage risk and generate sustainable, long-term investment returns. The Trustees believe that this approach to investment is in the best interests of members in accordance with their legal duties. The Trustees have a separate Responsible Investment Policy and Stewardship Policy which are subject to regular reviews with support from their investment adviser, the Company and the Cushon Investment Office.

Responsible Investment is a core element of the Scheme's default investment strategies, which are set with support from their investment adviser, the Company and the Cushon Investment Office. In making any portfolio construction decisions, the Trustees will have regard to their Responsible Investment Policy and Stewardship Policy and their investment beliefs.

Within the self-select range, the Trustees ensure that RI is integrated as a core element of as many funds as possible, subject to availability of funds within different asset classes. The self-select range will be regularly reviewed considering market and product developments in the ESG fund sector and taking into consideration member preferences expressed through member feedback.

Stewardship

The Trustees are committed to acting as responsible stewards of the assets that they govern on behalf of members. To formalise this commitment, the Trustees established a separate Stewardship Policy that is available on the Cushon website.

The Trustees have acknowledged responsibility for the voting and engagement policies that are implemented by the Scheme's Investment Managers on their behalf. It is the Trustees' intention that the Investment Managers appointed to run the Scheme's assets will share similar principles to them from a responsible investment perspective, and therefore any voting and engagement with underlying companies will be in line with the Trustees' investment beliefs and Stewardship Policy. With regards to voting activity, the Trustees have shared their investment beliefs, via their Stewardship Policy, with Mobius Life and the Investment Managers and will keep this under regular review. However, the Trustees note that the Investment Managers will be carrying out voting and engagement across a number of clients and may be managing this in line with the interests of all their clients. The Trustees will keep this under review.

The Trustees have set the following stewardship priorities for the Scheme and have communicated these to the Investment Managers and made clear what they consider to be the most significant votes: -

1. Climate alignment – decarbonising and minimising emissions
2. Climate adaptation
3. Biodiversity risk and management
4. Labour rights including modern slavery
5. Diversity and inclusion (on boards in particular)

The Trustees will review each Investment Manager's track record of voting and engagement (including whether they have acted on the Scheme's stewardship priorities) as part of their investment governance framework and will publish relevant information in the annual Implementation Statement. On an annual basis, the Trustees will also review each Investment Manager's stewardship capabilities and alignment with the Trustees' investment beliefs in line with their Stewardship Policy. If any areas of improvement are identified, the Trustees, typically via their Investment Adviser and/or the Cushon Investment Office, will engage with the relevant Investment Managers on proposed improvement actions.

As the Scheme's assets are held on the Mobius Life platform, the Trustees are also supported by Mobius Life's stewardship activities. Mobius Life engages with investment managers on the platform on a regular basis. Further detail can be found in their latest Stewardship Report: -
https://mobiuslife.co.uk/wp-content/uploads/2025/12/Mobius%20Life%20-%20Stewardship%20Report%202024.pdf

Policy on private market assets

As noted in the Trustees' Investment Beliefs, in order to achieve value for the Scheme's members and design investment solutions which maximise returns adjusted for risk and inflation, they will consider all investment opportunities and asset classes available. This includes unlisted and private market assets such as private equity and private debt, infrastructure and real estate, sometimes referred to as illiquid assets.

The Trustees believe that unlisted private market assets, which often cannot easily or quickly be sold or exchanged for cash, offer diversification benefits as well as the potential for improved risk-adjusted returns for members over the long term when considered alongside the more liquid asset classes used within the default investment strategies. The Trustees believe that meaningful exposure to private market assets gives a better reflection of the wider global economies than a portfolio solely invested in public markets. Such illiquid assets have therefore been included within the Cushon Sustainable Investment Strategy, which is the Trustees preferred default investment strategy, and the Cushon Target Age Funds. The growth phase of both of those strategies targets an allocation of up to 15% in private assets, which falls to 10% in the at-retirement phase.

The allocation to private assets within the Cushon Sustainable Investment Strategy default, and by extension the Cushon Target Age Funds default, has been developed gradually via staggered investments into the Schroders Capital Climate + Long Term Asset Fund ("LTAF"), a target allocation to the Aviva Investors Carbon Removal Fund and investment into the British Growth Partnership Fund I; other opportunities will be considered over time. The Schroders Capital Climate + LTAF is a multi-asset fund which invests in a range of illiquid assets such as real estate and infrastructure. The Aviva Investors Carbon Removal Fund is a multi-asset fund which invests in a range of illiquid assets including natural capital such as forests and moorland as well as private equity in engineered carbon removal technologies. The British Growth Partnership Fund I is a private equity fund which invests in venture capital companies mainly in the UK in areas such as life sciences and technology. In addition to the above listed benefits, the Trustees also believe that private market assets provide a vehicle to further implement their ESG and climate investment goals through direct and innovative solutions.

The Trustees are familiar with the risks associated with illiquid investments, which are documented within this SIP. To mitigate any associated risks, the Trustees, in collaboration with their Investment Adviser, conduct a rigorous due diligence process before committing to new investments and monitor them on an ongoing basis as part of the overall Scheme's risk management practice. This will include a review of its strategic alignment with the Scheme, its ability to generate expected returns, associated fees, asset liquidity, and risk management.

The Trustees commit to ensuring that the Scheme maintains sufficient liquidity to pay members’ benefits as they fall due, despite any investment in illiquid assets. Any decision to invest in illiquid assets will be made considering liquidity requirements, and the Trustees have agreed a liquidity management process, which operates as a separate document to this SIP, to manage any associated liquidity risks.

The Scheme also offers an alternative default investment strategy, the Cushon Core Investment Strategy.

While the Trustees are in support of illiquid assets, they recognise the need to offer an alternative default investment strategy, the Cushon Core Investment Strategy, for employers seeking a default investment strategy with lower investment managements costs. This default investment strategy therefore does not invest in illiquid assets.

7. Monitoring

Investment Managers

The Trustees, supported by their Investment Adviser, will track the length of the arrangement with and monitor the performance of the Investment Managers against their own benchmarks, and regularly review each Investment Manager’s ongoing competence and expertise. This is an ongoing process via quarterly reporting, quarterly discussions with the investment adviser, and meetings with managers which typically occur at least every 12-18 months.

As part of this review, the Trustees will consider whether each Investment Manager: -

- Is carrying out its function competently. The Trustees will evaluate the Investment Manager based on, among other things: -
  - The Investment Manager’s performance versus its benchmark.
  - The level of risk within the portfolios given any specified risk tolerances.
  - The competitiveness of Investment Managers’ fees, which are reviewed on an annual basis.
  - Has regard to the suitability of each investment and each category of investment.
- Has been exercising their powers of investment with a view to giving effect to the principles contained in this SIP, so far as is reasonably practical.
- If the Trustees are not satisfied with an Investment Manager they will ask the Investment Manager to take steps to rectify the situation. If the Investment Manager still does not meet the Trustees’ requirements, the Trustees will remove the Investment Manager and appoint another.
- The Scheme invests in pooled funds, the duration of which is flexible, and the Trustees will from time-to-time consider the appropriateness of the fund range and whether they should continue to be held.

- The Trustees do not directly monitor portfolio turnover costs. However, the Investment Managers are incentivised to minimise costs as performance is measured on a net of cost basis. The Investment Managers are required to provide transaction cost information on an annual basis, on the slippage cost methodology, for disclosure to members.
- The Trustees will evaluate and monitor the Investment Managers responsible investing activities, which will include voting and engagement, in accordance with their stated or agreed policies and as may be further agreed with the Trustees.
- The Investment Manager and Fund Managers are remunerated on a percentage charge basis related to the amount of assets under management. The Trustees believe that this incentivises the Investment Provider and Fund Managers to take a longer term approach to investment related considerations where the investment mandate allows them to do so and which allows them to act in the best interests of members and in line with the Trustees' investment strategy. Some underlying managers may charge a performance fee on a portion of assets.

Advisers

The Trustees will monitor the advice given by their advisers on a regular basis and assess their Investment Adviser annually against the investment objectives that have been set in accordance with Part 2 of the Investment Consultancy and Fiduciary Management Market Investigation Order 2019 and from 1 October 2022 in line with the Occupational Pension Schemes (Scheme Administration) Regulations 1996 (the scheme administration regulations).

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The Trustees will review this SIP at least triennially, or as soon as is practical following any changes to the investment strategy and modify it if deemed appropriate, in consultation with their relevant advisers, and the Company. There will be no obligation to change this SIP, any Investment Manager, the investment platform provider, or adviser as part of such a review.

Trustees' Recordkeeping

The Trustees maintain a record of all investment related decisions they have taken, together with the rationale in each case.

8. Fees

Member Charges

There are three sources of charges applicable to members: -

- Investment management charges
- Mobius platform charge
- Scheme platform charge (includes administration)

Fees are charged as a proportion of the size of assets invested. Some underlying managers may also charge performance fees on a portion of assets. The charges have been negotiated and will continue to be reviewed regularly. Some former Salvus Master Trust and the majority of former Creative Pension Trust members also pay a fixed monthly administration charge. Member charges are set out in each employer's Investment Choices document. Prior to the former Creative Pension Trust members being migrated onto the Cushon administration platform, which is planned to be completed before the end of 2026, those members' investment management, Mobius platform and Scheme platform charges are bundled and deducted by Mobius.

Advisers

Fees paid to the advisers are based either on actual time spent and hourly rates for relevant individuals or on fixed fees agreed in advance for specifically defined services and projects.

Value for Members

The Trustees review, as far as possible based on the data available, all sources of fees levied on members' accounts (including management charges, additional expenses, platform charges and any fixed monthly fee as appropriate) to ensure value for members is present. The Trustees consider, among other items, the absolute level of charges, the competitiveness of applicable charges relative to the marketplace and the levels of service provided by each of the advisers and Investment Managers.

The Trustees also review, as far as is reasonable and practical, transaction costs paid by members to assess the extent to which these represent good value for money.

The Trustees' conclusions in respect of value for members are documented in the Scheme's Chair's Annual Statement and annual report and accounts.

9. Risks

The Trustees recognise a number of key risks to the members of the Scheme: -

a) Value for Members Risk – the risk that the Scheme fails to offer value for members. This is addressed through regular 'value for members' reviews.

b) Inflation Risk – the risk that the purchasing power of members' investment accounts is not maintained. To try to manage this risk, the Trustees have offered a range of funds reflecting asset classes expected to provide long term returns greater than price inflation.

c) Pension Purchase Risk – the risk that the value of pension benefits that can be purchased by a given defined contribution amount is not maintained. This risk cannot easily be mitigated as it depends on market conditions for annuity rates at retirement, and the Cushon Sustainable Investment Strategy and Cushon Core Investment Strategy target a flexible-access outcome to reflect that not all members will look to purchase an annuity at retirement. However, these default investment strategies gradually de-risk as members approach retirement, including an increased allocation to bonds which should provide some degree of annuity price matching. For those members that who wish to purchase an annuity at retirement, an annuity targeting alternative lifestyle strategy is offered for both the Cushon Sustainable Investment Strategy and Cushon Core Investment Strategy.

d) Capital Risk – the risk that the value of any element used to provide a cash sum at retirement is not maintained. To try to mitigate this risk the default investment strategies de-risk as members approach retirement. A cash targeting alternative lifestyle strategy is offered for both the Cushon Sustainable Investment Strategy and Cushon Core Investment Strategy for those members wishing to take their savings as cash at retirement.

e) Concentration Risk - the risk that adverse conditions affecting a particular market or asset might significantly influence the overall performance of the Scheme's investments, especially where there is a large exposure to a single asset or market. To try to mitigate this risk the default investment strategies and alternative self-select investment options are designed and reviewed taking into account suitable levels of diversification as measured by the proportion of the Scheme's assets held in a particular asset or market with specific reference to each investment option.

f) Passive Investment Manager Risk – the risk that the passive investments do not track the index effectively. The Trustees have mitigated this risk by taking advice from their Investment Adviser in relation to passive investments. The Trustees monitor how effectively the Scheme's passive investments track their benchmarks as part of ongoing investment governance.

g) Active Investment Manager Risk – the risk that the active investments underlying the Scheme's investment options underperform due to the underlying Investment Manager underperformance. The Trustees have mitigated this risk by taking advice from their Investment Adviser in relation to active asset management. The Investment Adviser considers a wide range of funds; diversified across asset class, sub asset class and Investment Manager to reduce the active Investment Manager risk.

h) Communication Risk – the risk that communications to members are misleading or unclear and this led to inappropriate decisions being made. The Trustees take advice from their advisers on effective member communications, regularly review member communications and update where appropriate.

i) Inappropriate Member Decision – the risk that members make inappropriate decisions regarding their investments. This is addressed through communications to members and the recommendation that members seek independent financial advice and/or guidance. The Trustees also offer default investment strategies with a "lifestyling element" designed to phase members into lower volatility investments as they approach retirement.

j) Organisational Risk – the risk of inadequate internal processes leading to problems for the Scheme. This is addressed through a regular monitoring of the Investment Managers and advisers.

k) Liquidity Risk – the risk that members are not able to realise the value of their funds when required. The majority of funds the Trustees offer are liquid and subject to daily dealing. However, some of the underlying investments in the daily dealt funds may be less liquid (for example private market investments). In this case while the funds offered are usually daily dealing, there is a risk that the underlying funds may suspend investment or redemption requests in periods of extreme market volatility or have less frequent dealing cycles in the case of private market investments. The Trustees seek to mitigate the impact on members through regular assessment of the Scheme's inflows and outflows to ensure sufficient liquidity.

l) ESG Risk – the risk of adverse performance due to ESG related factors including climate change not being appropriately considered and addressed both in terms of investment risks and opportunities. This is addressed by carrying out regular reviews of the Investment Managers' approaches and effectiveness in managing ESG risks and opportunities.

m) Other Risks – The Trustees do identify other risks including but not limited to political, regulatory, operational and market risks which are considered in the Investment Strategy and its execution and on-going monitoring. Many of these risks are monitored through a Risk Register which is maintained, and actions tracked on a routine basis in the governance of the Scheme.

The importance of each risk varies with time. Inflation is important throughout the whole period to and through retirement, whereas pension purchase risk and capital risk become more significant as retirement approaches, depending on how the member chooses to access their pension saving at retirement.

The Trustees have provided default investment strategies that aim to address the above risks through a member's life. The Trustees may vary the underlying asset allocation and Investment Managers within these strategies from time to time in response to changing market conditions and Investment Manager developments.

The Trustees also provide members with cash and annuity targeting alternative lifestyle strategies for the Cushon Sustainable Investment Strategy and Cushon Core Investment Strategy, alongside a range of self-select investment options into which they may direct their contributions to allow each member to determine the appropriate mix of investments based on their own attitude to risk, terms to retirement and investment objective.

The Trustees recognise that an efficient process for identifying, evaluating, managing, and monitoring risks needs to be in place for the Scheme. The Trustees will identify and assess the impact of any risk, what controls can be put in place to manage the risk and review both the individual risks and the effectiveness of the risk management process.

The Trustees will keep these risks and how they are managed under regular review.

Appendix – Investment Options

The Cushon Sustainable Investment Strategy is the Trustees preferred default investment strategy that is offered in the Scheme. The Trustees and Company encourage participating employers comfortable with the use of private markets within a default investment strategy to select this default investment strategy for members as they believe it will deliver the best risk-adjusted returns and therefore provide a better net of fees outcome for members.

The Trustees do offer an alternative default investment strategy, known as the Cushon Core Investment Strategy, for participating employers seeking a lower cost strategy that does not incorporate private markets. Whilst it is not their preferred default investment strategy, the Trustees are comfortable that the Cushon Core Investment Strategy is an appropriate default to offer members.

Main Default Investment Strategy: Cushon Sustainable Investment Strategy

For participating employers that choose the Cushon Sustainable Investment Strategy, members who do not make a specific investment choice will be automatically invested in the Cushon Sustainable Investment Strategy. This phases a member's assets through different funds (set out in the chart below) as retirement approaches.

Main Default Investment Strategy: Underlying Funds

Fund	Asset class	Target Allocation in Growth Phase	Target Allocation at Retirement
J.P. Morgan Mansart Management	Equities	75.0%	40.0%
Schroders Capital Climate +	Private Markets	12.0%	8.0%
Aviva Investors Carbon Removal Fund	Private Markets	2.0%	1.33%
British Growth Partnership Fund I	Private Markets	1.0%	0.67%
Wellington Global Impact	Corporate Bonds	2.5%	6.25%
Lombard Odier Target Net Zero	Corporate Bonds	2.5%	6.25%
L&G Future World Corporate Bond Index	Corporate Bonds	1.8%	4.5%
Ninety One Global Target Return Credit	Multi Asset Credit	3.2%	8.0%
L&G Over 5 Year Index-Linked Gilts	Government Bonds	-	15.0%
L&G Cash	Cash	-	10.0%

The allocations shown above represent the long-term targets to different funds. Actual allocations may differ, in particular where new funds, such as the Schroders Capital Climate + Fund, the Aviva Investors Carbon Removal Fund and the British Growth Partnership Fund I, take time to reach their target allocation or they cannot be immediately bought and sold. The initial commitment to the Aviva Investors Carbon Removal Fund is £30,000,000 and the British Growth Partnership Fund I commitment is £20,000,000.

The growth phase aims to deliver an expected long-term return (net of fees) of CPI + 3.5% p.a.

The at retirement phase aims to deliver an expected long-term return (net of fees) of CPI + 1.5% p.a.

Alternative Default Investment Strategy: Cushon Core Investment Strategy

For Employers that choose the Cushon Core Investment Strategy, members who do not make a specific investment choice will be automatically invested in the Cushon Core Investment Strategy. This phases a member's assets through different funds (set out in the chart below) as retirement approaches.

Cushon Core Default Strategy: Underlying Funds

Fund	Asset class	Target Allocation in Growth Phase	Target Allocation at Retirement
J.P Morgan Mansart Management	Equities	90.0%	50.0%
Wellington Global Impact	Corporate Bonds	2.5%	6.25%
Lombard Odier Target Net Zero	Corporate Bonds	2.5%	6.25%
L&G Future World Corporate Bond Index	Corporate Bonds	1.8%	4.5%
Ninety One Global Target Return Credit	Multi Asset Credit	3.2%	8.0%
L&G Over 5 Year Index-Linked Gilts	Government Bonds	-	15.0%
L&G Cash	Cash	-	10.0%

The allocations shown above represent the long-term targets to different funds. Actual allocations may differ, where new funds take time to reach their target allocation.

The growth phase aims to deliver an expected long-term return (net of fees) of CPI + 3.5% p.a.

The at retirement phase aims to deliver an expected long-term return (net of fees) of CPI + 1.5% p.a.

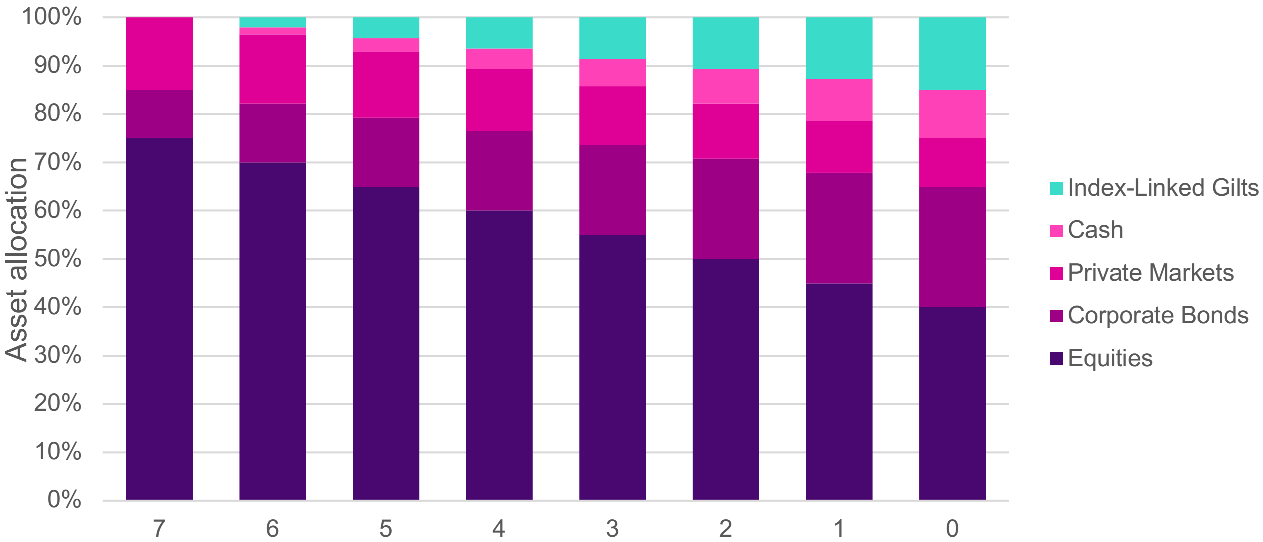
Former Creative Pension Trust members – Alternative Default Investment Strategy: Cushon Target Age Funds

All Creative Pension Trust (CPT) members were transferred to the Cushon Master Trust on 16 February 2026. The investment strategies for those members were not changed as a result of the transfer. Some former Creative Pension Trust members therefore remain invested in the Cushon Target Age Funds. No other members can invest in the Cushon Target Age Funds.

The Cushon Target Age Funds default investment strategy comprises the following individual funds: -

Cushon 2030 Target Age Fund
Cushon 2035 Target Age Fund
Cushon 2040 Target Age Fund
Cushon 2045 Target Age Fund
Cushon 2050 Target Age Fund
Cushon 2055 Target Age Fund
Cushon 2060 Target Age Fund
Cushon 2065 Target Age Fund
Cushon 2070 Target Age Fund
Cushon Retirement Ready Fund

The Cushon Target Age Funds default mirrors that of the Cushon Sustainable Investment Strategy, with the same underlying funds. The strategy phases a member's assets through different funds (set out in the chart below) as the target year approaches.



Cushon Target Age Funds: Underlying Funds

Fund	Asset class	Target Allocation in Growth Phase	Target Allocation at Retirement
J.P. Morgan Mansart Management	Equities	75.0%	40.0%
Schroders Capital Climate +	Private Markets	12.0%	8.0%
Aviva Investors Carbon Removal Fund	Private Markets	2.0%	1.33%
British Growth Partnership Fund I	Private Markets	1.0%	0.67%
Wellington Global Impact	Corporate Bonds	2.5%	6.25%
Lombard Odier Target Net Zero	Corporate Bonds	2.5%	6.25%
L&G Future World Corporate Bond Index	Corporate Bonds	1.8%	4.5%
Ninety One Global Target Return Credit	Multi Asset Credit	3.2%	8%
L&G Over 5 Year Index-Linked Gilts	Government Bonds	-	15%
L&G Cash	Cash	-	10%

The allocations shown above represent the long-term targets to different funds. Actual allocations may differ, in particular where new funds, such as the Schroders Capital Climate + Fund, the Aviva Investors Carbon Removal Fund and British Growth Partnership Fund I, take time to reach their target allocation or they cannot be immediately bought and sold. The initial commitment to the Aviva Investors Carbon Removal Fund is £30,000,000 and the British Growth Partnership Fund I commitment is £20,000,000.

The growth phase aims to deliver an expected long-term return (net of fees) of CPI + 3.5% p.a.

The at retirement phase aims to deliver an expected long-term return (net of fees) of CPI + 1.5% p.a.

The Cushon Target Age Funds will have the at-retirement target allocation from January of the target year. Then within six months of the start of the target year, members' assets will be automatically transferred into the Cushon Retirement Ready Fund if the member has not taken their benefits or chosen an alternative investment approach. The Cushon Retirement Ready Fund has the same at-retirement target allocation shown above.

Alternative Lifestyle Strategies

There are two alternative lifestyle strategies offered to members in the Cushon Sustainable Investment Strategy and Cushon Core Investment Strategies: -

- Cash Lifestyle Strategy: for members planning to take their saving as a one-off cash lump sum.
- Annuity Lifestyle Strategy: for members planning to purchase an annuity with their savings.

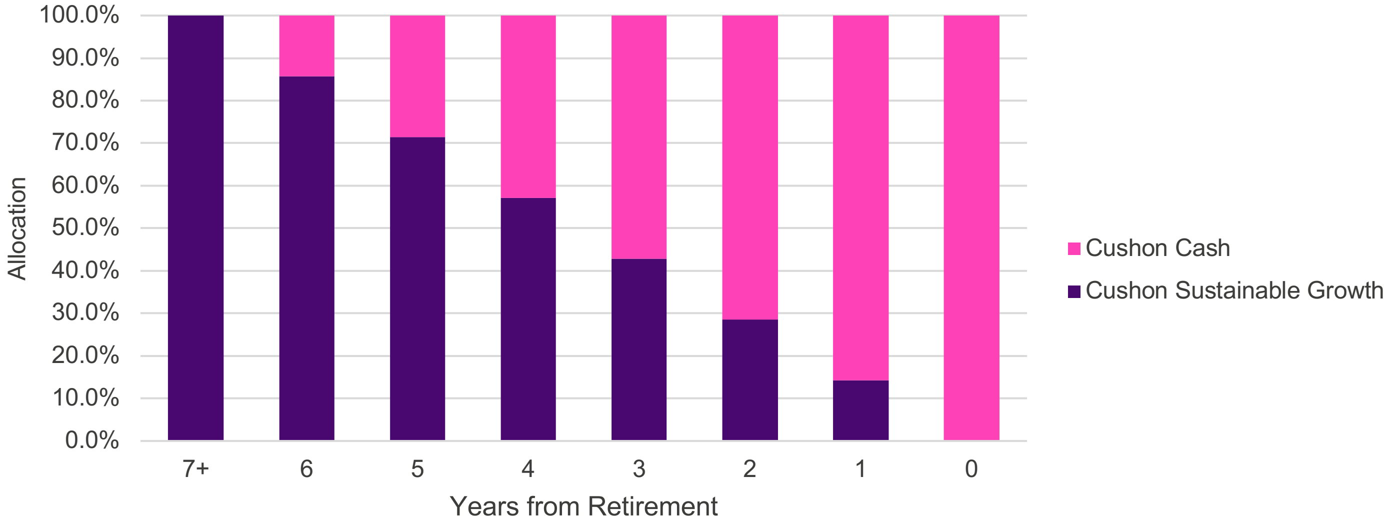
During the growth phase, members will be invested in the same growth assets as the corresponding Cushon Sustainable Investment Strategy or Cushon Core default. For members within the Cushon Sustainable Investment Strategy default who select an alternative lifestyle strategy, the Private Markets allocation is replaced by the BlackRock Market Advantage Fund. From seven years prior to the member's Target Retirement Age, the asset allocation of the member's investments begins to differ from the Default investment strategies as they move towards their alternative de-risking lifestyle targets. This is illustrated by the charts below.

The Alternative Lifestyle Strategies will not be available to former Creative Pension Trust members until they have been migrated onto the Cushon administration platform. This is expected to take place before the end of 2026.

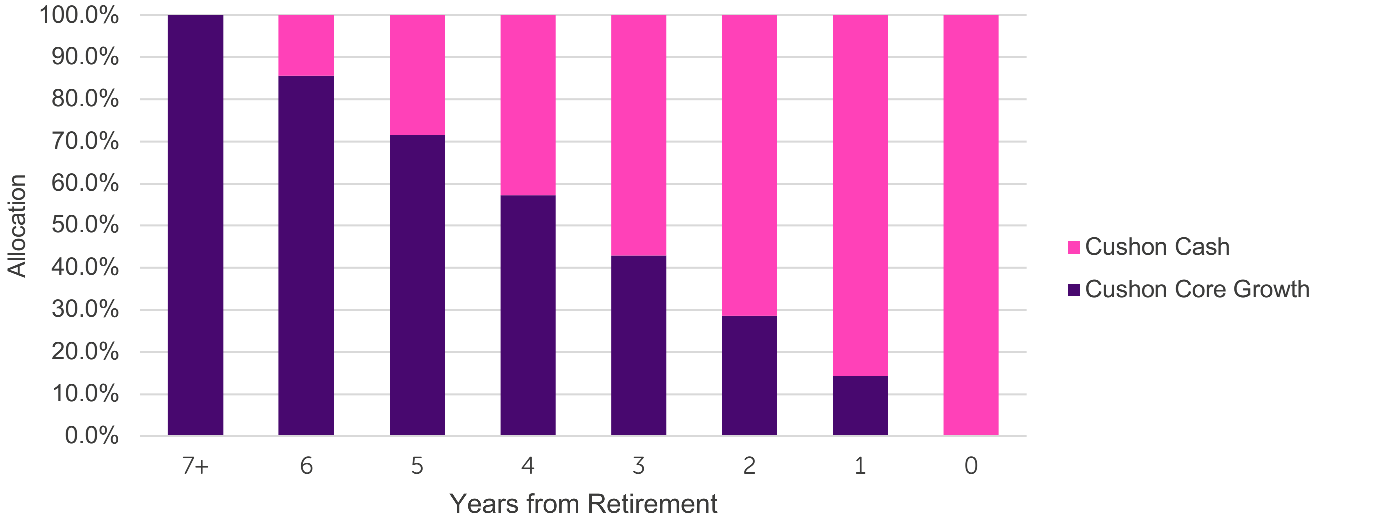
Cushon Sustainable Investment Strategy and Cushon Core Investment Strategy: Cash Lifestyle Strategy

The Cash Lifestyle Strategy de-risks towards an asset allocation of 100% cash by the member's Target Retirement Age. The asset allocations for the de-risking lifestyles are shown below.

Cushon Sustainable Investment Strategy - Cash De-Risking Strategy



Cushon Core Investment Strategy - Cash De-Risking Strategy



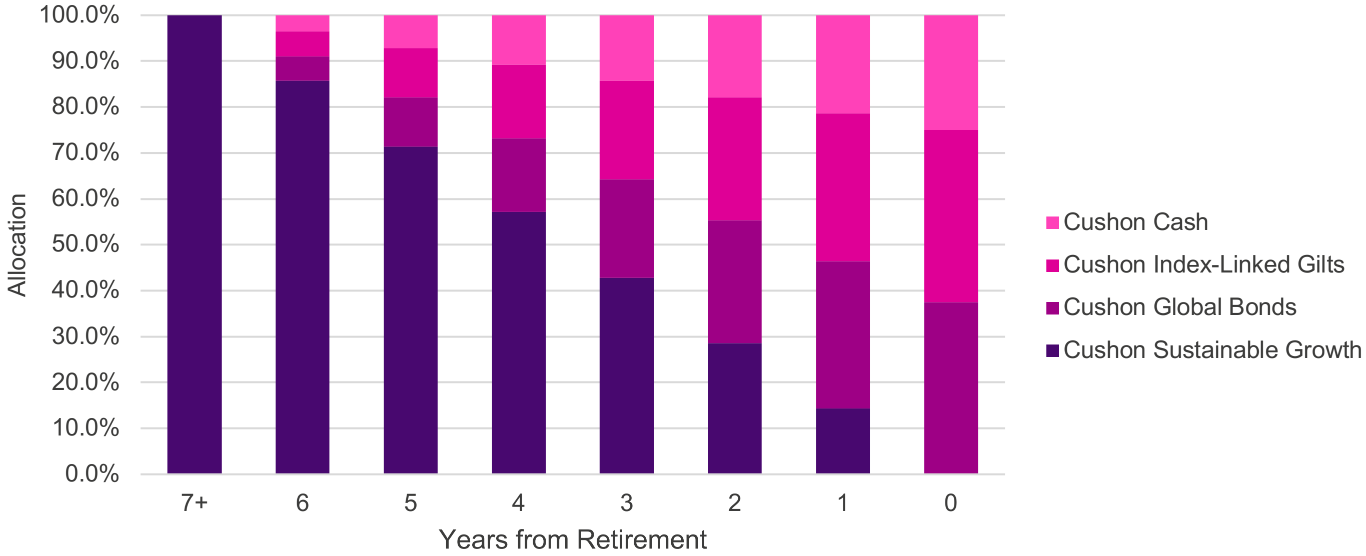
The component funds used within the alternative lifestyle strategies are the same as those used in the Cushon Sustainable Investment Strategy and Cushon Core Investment Strategy defaults. Except within the Cushon Sustainable Investment Strategy, the Private Markets allocation has been replaced by the BlackRock Market Advantage Fund.

Cushon Sustainable Investment Strategy and Cushon Core Investment Strategy: Annuity Lifestyle Strategy

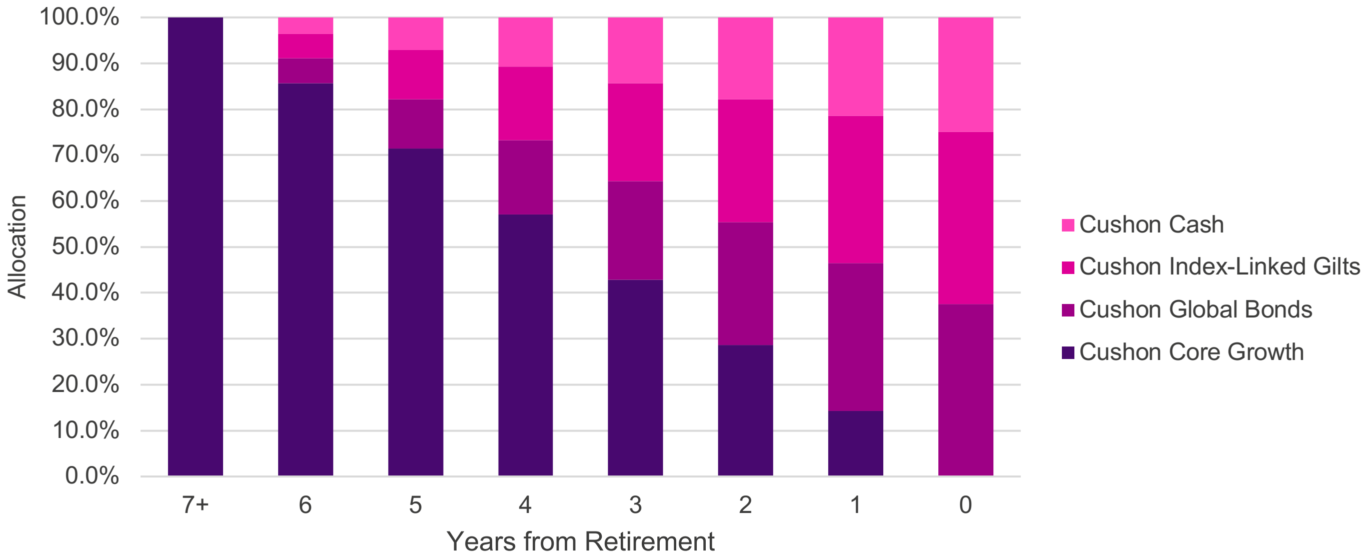
The Annuity Lifestyle Strategy de-risks towards an asset allocation of 12.0% Multi Asset Credit, 25.5% Corporate Bonds, 37.5% Index Linked Gilts and 25% Cash by the member’s Target Retirement Age. This asset allocation is expected to broadly track changes in annuity rates by a) duration matching to annuity rates to ensure interest rate hedging, b) offering some risk upside from Corporate Bonds, and c) offering a level of inflation protection via index linked gilts.

The asset allocations for the annuity de-risking lifestyles are shown below.

Cushon Sustainable Investment Strategy - Annuity De-Risking Strategy



Cushon Core Investment Strategy - Annuity De-Risking Strategy



The component funds used within the alternative lifestyle strategies are the same as those used in the Cushon Sustainable Investment Strategy and Cushon Core Investment Strategy defaults. Except within the Cushon Sustainable Investment Strategy the Private Markets allocation has been replaced by the BlackRock Market Advantage Fund.

Cushon Sustainable Investment Strategy, Cushon Core Investment Strategy and Cushon Target Age Funds: Underlying Funds

Fund	Target Objective	Investment Style
ML Cushon Global Equity Fund (J.P Morgan Mansart Management)	Deliver returns in line with the Cushon JPM Global Equity Index in GBP + 20bps p.a. for no management fee. The Cushon JPM Global Equity Index is constructed to have stronger sustainability metrics than global equities.	Passive
Schroders Capital Climate + *(Cushon Sustainable Investment Strategy only)*	Net return of 8% p.a. with impact targets of 12.5k tCO_2e avoided, 11k tCO_2e captured, 300k people with increased climate risk resilience and less than 17.5k tCO_2e generated per £10m invested.	Active
Aviva Investors Carbon Removal Fund	Generate and distribute high-integrity carbon-removal credits and other associated financial returns through exposure to a diversified portfolio of nature-based and engineered carbon removal solutions, balancing solution, technology and geographic risks. The Fund aims to provide an overall financial return (net of annual management charges) of 8% per annum over a 25-year period.	Active
British Growth Partnership Fund	Invests in high-growth UK companies, particularly in the technology and life sciences sectors, targeting a 19% net Internal Rate of Return. The fund aims to leverage the British Business Bank's scale and networks to support innovative startups and scale-ups, thereby contributing to the UK's economic growth and investment in high-potential companies.	Active
BlackRock Market Advantage *(Cushon Sustainable Investment Strategy Alternative Lifestyle Strategies only)*	The fund aims to provide a return over the long-term (5 consecutive years) that exceeds 3 Month SONIA + 3.5% per annum (gross of fees).	Active
Wellington Global Impact Corporate Bonds	The fund targets 50bps gross outperformance p.a. versus the Bloomberg Barclays Global Aggregate Index (hedged to USD). The fund seeks to improve access to, and the quality of, basic life essentials reduce inequality and mitigate the effects of climate change.	Active
Lombard Odier Target Net Zero	The fund targets 100bps gross outperformance p.a. versus the Bloomberg Barclays Global Aggregate Corporate Bond Index over a credit cycle. The fund targets a 50% reduction in CO_2 emissions by 2030, and NetZero by 2050.	Active
L&G Future World GBP Corporate Bond Index	Track the performance of the Solactive L&G ESG GBP Investment Grade Corporate TR Index. The fund employs a passive index tracking strategy while reflecting significant environmental, social and corporate governance (ESG) issues. Companies that fail to meet L&G's minimum standards in low carbon transition and corporate governance standards may be excluded from the fund.	Passive
Ninety One Global Total Return Credit	The fund targets Sterling Overnight Index Average ("SONIA") + 4% per annum (gross of fees) over a full credit cycle (which may be measured over 5-year rolling periods). The fund uses an unconstrained, bottom-up investment approach, targeting the most efficient allocation of capital across the global credit universe. The fund employs a bottom-up sustainability framework to identify the best- in-class companies and align the portfolio with net zero while achieving an immediate emission reduction of more than 50% compared to its benchmark.	Active
L&G Over 5 Year Index-Linked Gilts	Track the performance of the FTSE Actuaries UK Index-Linked Gilts Over 5 Years Index to within +/-0.25% p.a. for two years out of three.	Passive
L&G Cash	Perform in line with SONIA (Sterling Overnight Index Average).	Active

Self-Select Fund Options

The self-select options allow members to choose from a selection of funds based on their own attitude to risk, term to retirement and investment objective. The funds that may be made available to members are set out below.

Fund	Underlying Fund(s)	Target Objective	Investment Style
Cushon Sustainable Global Equity	L&G Future World Global Equity Index	Track the performance of the Solactive L&G ESG Global Markets Index.	Passive
Cushon Sustainable UK Equity	L&G Future World UK Equity Index	Track the performance of the Solactive L&G ESG UK Index.	Passive
Cushon Sustainable Europe (ex UK) Equity	L&G Future World Europe (ex UK) Equity Index	Track the performance of the Solactive L&G ESG Europe ex UK Index.	Passive
Cushon Sustainable Japanese Equity	L&G Future World Japan Equity Index	Track the performance of the Solactive L&G ESG Japan Index.	Passive
Cushon Sustainable North American Equity	L&G Future World North American Equity Index	Track the performance of the Solactive L&G ESG North America Index.	Passive
Cushon Sustainable Pacific ex Japan Equity	L&G Future World Asia Pacific (ex Japan) Equity Index	Track the performance of the Solactive L&G ESG Asia Pacific ex Japan Index.	Passive
Cushon Sustainable Emerging Market Equity	L&G Future World Emerging Markets Equity Index	Track the performance of the Solactive L&G ESG Emerging Markets Index.	Passive
Cushon Shariah	Blackrock ACS World Islamic Equity Tracker	Track the performance of the MSCI World Islamic M-Series Index,	Passive
Cushon Global Equity*	ML Cushon Global Equity Fund (J.P Morgan Mansart Management)	Deliver returns in line with the Cushon JPM Global Equity Index in GBP + 20bps p.a. for no management fee and a zero tracking error.	Passive
Cushon Fixed Interest Gilts	L&G All Stocks Gilt Index	Track the performance of the FTSE Actuaries UK Conventional Gilts All Stocks Index.	Passive
Cushon Index-Linked Gilts	L&G All Stocks Index-Linked Gilts Index	Track the performance of the FTSE Actuaries UK Index-Linked Gilts All Stocks Index.	Passive
Cushon Sustainable UK Corporate Bonds	L&G Future World GBP Corporate Bond Index	Track the performance of the Solactive L&G ESG GBP Investment Grade Corporate TR Index	Passive
Cushon Cash	L&G Cash	Perform in line with SONIA (Sterling Overnight Index Average).	Active
Cushon Global Bonds*	Wellington Impact Bond (25%), Lombard Odier Bond (25%), L&G (18%) & Ninety-One (32%)	Wellington: The fund targets 50bps gross outperformance p.a. versus the Bloomberg Barclays Global Aggregate Index (hedged to USD). The fund seeks to improve access to, and the quality of, basic life essentials reduce inequality and mitigate the effects of climate change. Lombard Odier: The fund targets 100bps gross outperformance p.a. versus the Bloomberg Barclays Global Aggregate Corporate Bond Index over a credit cycle. The fund targets a 50% reduction in CO2 emissions by 2030, and NetZero by 2050. L&G: Track the performance of the Solactive L&G ESG GBP Investment Grade Corporate TR Index. Ninety One: The fund targets SONIA + 4% gross of fees over a full credit cycle (which may be measured over 5-year rolling periods).	Active

Cushon Cautious Drawdown Fund*	Cushon Global Equity (20%), Cushon Global Bonds (25%), Cushon Inflation-Linked Government Bonds (15%), Cushon Fixed-Interest Gilts (15%), Cushon Market Advantage (10%), Cushon Sterling Cash (15%)	For members seeking a cautious investment approach after first accessing their pension. It aims for greater stability but slower growth than the default option.	Includes both active and passive
Cushon Adventurous Drawdown Fund*	Cushon Global Equity (55%), Cushon Global Bonds (25%), Cushon Inflation-Linked Government Bonds (10%), Cushon Market Advantage (10%)	For members seeking an adventurous investment approach after first accessing their pension. It aims for greater growth opportunity but lower stability than the default option.	Includes both active and passive
Cushon Very Adventurous Drawdown Fund*	Cushon Global Equity (75%), Cushon Global Bonds (10%), Cushon Market Advantage (15%)	For members seeking a very adventurous investment approach after first accessing their pension. It aims for the greatest growth potential with much lower stability than the default option.	Includes both active and passive

*These funds will not be available to former Creative Pension Trust members until they are migrated onto the Cushon administration platform, which is expected to take place before the end of 2026.

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