

The 4imprint 2016 Pension Plan (“the Plan”)
Statement of Investment Principles

Plan details

This document sets out the Statement of Investment Principles (the “SIP”) adopted by the Trustee of the Plan.

The Plan operates for the exclusive purpose of providing retirement and death benefits to eligible participants and beneficiaries.

The Plan is a Defined Benefit Plan in which a member’s pension is based broadly on the number of years’ service and final salary with an employer.

The Plan is an occupational pension scheme registered with HM Revenue & Customs.

Administration of the Plan is the responsibility of the Trustee and delegated to a third-party Administrator.

The Trustee has also taken the Myners Principles into consideration when making decisions about the Plan’s investment arrangements.

The Trustee is responsible for the investment of the Plan’s assets.

Investment objective

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.

In June 2023 the Trustee agreed to use the Plan’s assets to purchase a full buy-in policy with Legal and General Assurance Society (‘LGAS’) which covers the vast majority of the Plan’s liabilities, potentially ahead of converting to a full buy-out arrangement.

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 Plan’s target investment strategy is invested according to the following asset allocation:

Asset Class	Allocation (%)	Expected Return⁽¹⁾ (relative to UK Gilts) (% p.a.)
Buy-in Policy	100	0.0
Total	100	0.0

Notes:

⁽¹⁾ Expected returns are based on best estimate assumptions relative to 10 year UK fixed interest gilts.

The benefits of a buy in policy have been deemed appropriate, having taken the Trustees' objectives into account.

Investment mandates

The Trustee has appointed LGAS as an insurer to manage the buy-in policy as the remaining asset of the Plan, excluding cash held in the Trustee bank account. LGAS 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 insurer via a written agreement. The delegation includes decisions about:

- Social, environmental, ethical and governance considerations in selection, retention and realisation of investments;
- The exercise of rights (including voting rights) attaching to the investments;
- Undertaking engagement activities with investee companies and other stakeholders, where appropriate.

The insurer is expected to exercise their powers of investment with a view to giving effect to the principles contained within this statement, so far as reasonably practicable.

Investment manager monitoring and engagement

It has been agreed with the Sponsoring Company ("Company") that any true-up premium in respect to the buy-in insurance policy will be paid for by the Company, after utilising any residual assets within the Trustee bank account.

The Trustee acknowledges the importance of Environmental, Social and Governance factors (ESG). As the majority of the assets are invested in the buy-in policy, there is limited scope for the Trustee to incorporate ESG into the Plan's investment strategy.

Employer-related investments

The Trustee's policy is not to hold any employer-related investments as defined in the Pensions Act 1995 and the Occupational Pension Schemes (Investment) Regulations 2005, except where the Plan invests in collective investment schemes 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 asset value. The Trustee will monitor this on an ongoing basis to ensure compliance.

Direct investments

Direct investments, as distinguished 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 their investment adviser.

Additional Voluntary Contributions (“AVCs”)

The Plan does not have any active members so there is no requirement to offer an AVC facility.

Governance

The Trustee of the Plan will make all major strategic decisions including, but not limited to, the Plan’s asset allocation, permitted ranges and the appointment and termination of investment managers.

When making such decisions, and when appropriate, the Trustee takes proper written advice. The Trustee’s investment advisers, Isio Group Limited, are qualified by their ability in and practical experience of financial matters and have the appropriate knowledge and experience. The investment adviser’s 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.

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. Before preparing or subsequently revising this Statement, the Trustee consulted the Sponsoring Company and took appropriate written advice. The Statement is reviewed at least every three years, and without delay after any significant change in the investment arrangements.

Signed on behalf of BESTrustees Limited as Trustee of the 4imprint 2016 Pension Plan

Rachel Tranter
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Date: September 2023

Appendix A – Risks, Financially Material Considerations 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. All risks within this Appendix are considered to be relevant over the lifetime of the Plan’s existing investment strategy in the context of the Trustee’s current objectives.

The Trustee adopts an integrated risk management approach. The three key risks associated with this framework and how they are managed are stated below:

Risk	Definition	Policy
Investment	The risk that the Plan’s position deteriorates due to the assets underperforming.	<ul style="list-style-type: none"> Select an investment objective that is achievable and is consistent with the Plan’s funding basis and the sponsoring company’s covenant strength.
Funding	The extent to which there are insufficient Plan assets available to cover ongoing and future liability cash flows.	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> 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 a mismatch between changes in the value of the Plan’s assets and the present value of its liabilities due to changes in interest rates and inflation expectations.	<ul style="list-style-type: none"> To broadly hedge 100% of these risks through a full buy-in policy.
Liquidity	Difficulties in raising sufficient cash when required without adversely	<ul style="list-style-type: none"> To maintain a sufficient allocation to liquid assets so that there is a prudent buffer to meet

	impacting the fair market value of the investment.	ongoing benefit payments and expenses.
Market	Experiencing losses due to factors that affect the overall performance of the financial markets.	<ul style="list-style-type: none"> To remain appropriately diversified, where relevant, and hedge away unrewarded risks, where practicable.
Credit	Default on payments due as part of a financial security contract.	<ul style="list-style-type: none"> Where relevant, to appoint investment managers who actively manage this risk by seeking to invest only in debt securities where the yield available sufficiently compensates the Plan for the risk of default.
Environmental, Social and Governance (“ESG”)	Exposure to Environmental, Social and Governance factors, including but not limited to climate change, which can impact the performance of the Plan’s investments.	<ul style="list-style-type: none"> The Trustee does not impose social, environmental or ethical constraints on the insurer in relation to the selection, retention and realisation of investments.
Currency	The potential for adverse currency movements to have an impact on the Plan’s investments.	<ul style="list-style-type: none"> Hedge all currency risk on all assets that deliver a return through contractual income.
Longevity	Members of the Scheme living longer than expected, leading to a larger than expected liability.	<ul style="list-style-type: none"> To hedge this risk through the purchase of the buy-in policy.
Non-financial	Any factor that is not expected to have a financial impact on the Plan’s investments.	<ul style="list-style-type: none"> 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:

<p>How the investment managers are incentivised to align their investment strategy and decisions with the Trustee’s policies.</p>	<ul style="list-style-type: none"> As the Plan is invested in the buy-in policy, there is not scope to tailor its strategy and the insurer’s decisions in line with the Trustee’s policies. However, the purchase of the buy-in policy is aligned to the strategic objective.
<p>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.</p>	<ul style="list-style-type: none"> The Trustee monitors the investment managers’ engagement and voting activity on an annual basis as part of the Implementation Statement for the Trustee report and accounts.
<p>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.</p>	<ul style="list-style-type: none"> This is not applicable given the nature of the full buy-in exercise
<p>The method for monitoring portfolio turnover costs incurred by investment managers and how they define and monitor targeted portfolio turnover or turnover range.</p>	<ul style="list-style-type: none"> This is not applicable given the nature of the full buy-in exercise.
<p>The duration of the Plan’s arrangements with the investment managers</p>	<ul style="list-style-type: none"> The purchase of a buy-in policy is a permanent investment, but this was deemed to be appropriate for the Plan given the additional security it provides for members’ benefits.
<p>Voting Policy - How the Trustee expects investment managers to vote on their behalf</p>	<ul style="list-style-type: none"> The Trustee has acknowledged responsibility for the voting policies that are implemented by the Plan’s insurers on their behalf. Given the Plan’s current investment arrangements, this is currently not applicable.
<p>Engagement Policy - How the Trustee will engage with investment managers, direct assets and others about ‘relevant matters’</p>	<ul style="list-style-type: none"> The Trustee has acknowledged responsibility for the engagement policies that are implemented by the Plan’s insurers on their behalf. The Trustee, via their investment advisers, will engage with managers about ‘relevant matters’ as desired or required.

	<p>Example stewardship activities that the Trustee undertakes are listed below.</p> <ul style="list-style-type: none">• Asset manager engagement and monitoring – on an annual basis, the Trustee assesses the engagement activity of their asset managers.
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