Statement of Investment Principles

This is the Statement of Investment Principles (the "Statement") made by the Trustees of The Sumitomo Mitsui Banking Corporation Europe Limited Pension Scheme ("the Scheme") accordance with the Pensions Act 1995 (as amended). The Statement, which was approved by the Trustees on 11 December 2025, is subject to periodic review at least every three years and without delay after any significant change in investment policy

In preparing this Statement, the Trustee has consulted with the employer to the Scheme ("The Sumitomo Mitsui Banking Corporation Europe Limited Pension Scheme") and has taken and considered written advice from the Investment Practice of Hymans Robertson LLP.

The Trustees are aware of the Myners Code of Conduct for Investment Decision Making and has reviewed its responsibilities and activities in the context of the Code.

The Trustees are supportive of the UK Stewardship Code which seeks to improve the quality of engagement between institutional investors and investee companies. Where appropriate, the Trustees expect investment managers to comply with the code and to produce a statement of their commitment to the code.

Scheme objective

To guide it in the strategic management of the assets and control of the various risks to which the Scheme is exposed, the Trustee has adopted the following objectives:

Defined Benefit Section

- To ensure that the assets will be sufficient to meet the Scheme's Statutory Funding Objective.
- Invest residual assets to provide for the accrual of future benefits for active members over time.

Defined Contribution Section

- To maximise the value of members' retirement benefits, within an acceptable level of risk.
- To provide members with a degree of choice and flexibility to meet their risk and return requirements.
- To avoid over complexity in investment for ease of transparency and in order to keep administration costs to a reasonable level.

For employee members, benefits are based on service completed but take account of future salary increases. The value of liabilities is calculated on the basis agreed by the Trustee and the Scheme Actuary. The funding position is monitored regularly by the Trustee and formally reviewed at each triennial actuarial valuation, or more frequently as required by the Pensions Act 2004.

Buy-in policy

In November 2025, the Trustees entered into an insurance policy ("the Policy") with Pension Insurance Corporation ("PIC") which covers all benefits due to deferred, pensioner members of the Scheme as well as benefits accrued by the active members until 30 May 2025. The vast majority of the Scheme's assets were transferred to PIC as an insurance premium at the time.

Under the policy, PIC makes monthly payments to the Scheme to match the insured liabilities and cover benefit payments to members. PIC covers the longevity risks of members as well as the investment risks of the assets

under the Policy. In entering the Policy, the Trustee received written advice as necessary from their professional advisers.

PIC is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. The Trustee carried out extensive due diligence assessment on PIC, noting the regulatory environment in which the insurer must operate.

Suitability

The Trustee has taken advice from the Scheme's risk transfer advisers who have confirmed appropriate knowledge and experience of the management of and investment of trust schemes, to ensure that the Policy is suitable.

Investment strategy

The majority of the Scheme's assets now consist of the Policy, whereby the liabilities of the Scheme are secured by this matching asset.

The Scheme's assets outside of the Policy are held in a strategy which aims to:

- hedge the remaining liabilities (e.g. ongoing accrual of benefits for active members and potential changes to the liabilities due to GMP equalisation); and
- preserve the value of assets / generate modest returns to ensure sufficient funds are available to meet future objectives of the Trustees.

In order to meet these objectives, the Trustee has agreed a suitable strategic asset allocation for the Scheme, consisting of gilts, investment grade corporate bonds and cash.

Choosing investments

The Trustee has appointed the insurance provider PIC to manage the Policy which secures the vast majority of the Scheme's liabilities. PIC is solely responsible for management of assets backing the Policy and ensuring that sufficient funds are available to meet its obligations to the Scheme.

In addition, the Trustee has appointed Legal & General Asset Management ("L&G") to manage the Scheme's residual investments. L&G are authorised under the Financial Services and Markets Act 2000 to undertake investment business. The Trustees, after taking appropriate advice, have chosen to invest in L&G pooled funds. L&G have some discretion on the implementation of the investment strategies of each fund . The Trustees are satisfied that the pooled funds selected are consistent with the objectives of the Scheme's residual holdings, particularly in relation to diversification, risk, expected return and liquidity.

Kinds of investment to be held

The Scheme may invest in quoted and unquoted securities of UK and overseas markets including equities and fixed interest and index linked bonds, cash, property and commodities either directly or through pooled funds.

The Scheme may also make use of contracts of insurance (including annuity contracts provided by insurance companies), derivatives and contracts for difference (or in pooled funds investing in these products) for the purpose of efficient portfolio management or to hedge specific risks. The Trustees consider all of these classes of investment to be suitable in the circumstances of the Scheme.

Investment Strategy

The investment funds used for the residual assets are expected to deliver a specific performance target, which overall will align to deliver the broader Scheme investment strategy. The Trustees ensure that all manager engagements have clearly defined benchmarks, objectives and management parameters.

The Trustees will invest in pooled funds where the objectives of the fund and the policies of the investment manager will be evaluated by the Trustees to ensure that they are appropriate for the needs of the Scheme. The trustees are satisfied that the pooled funds selected are consistent with the objectives of the Scheme, particularly in relation to diversification, risk, expected return and liquidity.

Investment Management Remuneration

Remuneration for each mandate is determined at the inception of each mandate based on commercial considerations and typically set on an ad valorem basis. Where appropriate to the nature of the mandate, the term of the mandate and the role the mandate plays within the investment strategy, the Trustees may agree to a fee structure where the manager is incentivised to deliver outperformance relative to an agreed benchmark, typically in conjunction with a lower ad valorem fee. The Trustees periodically review the fees paid to all its managers against industry standards.

Investment Time Horizon

The Trustees recognise the long-term nature of its liability profile and appoints its managers to invest in such a way that generates long term sustainable returns. The Trustees will carry out necessary due diligence on the underlying investment decision making process, to ensure the manager makes investment decisions over an appropriate time horizon aligned with the Scheme objective.

The duration of each mandate is determined by the Trustees at the inception of each mandate. For open-ended investments, the Trustees generally engage managers on an ongoing basis with no pre-determined term of appointment. For such mandates, the Trustees expect the minimum duration of the appointment will be three years, this being the period over which performance of the mandate can be appropriately evaluated although all mandates are subject to ongoing review against various financial and non-financial metrics in addition to their continued appropriateness within the investment strategy. For close-ended investments, the Trustees expect the term of the appointment to be the lifetime of the investment.

Balance between different kinds of investments

The majority of the Scheme's assets are now held in the Policy, which covers the vast majority of the Scheme's liabilities. As such, the Trustee accepts that the principles of balance between investments are only applicable to the residual assets i.e. those not connected to the insurance policies.

The strategic asset allocation of the Scheme includes a mix of asset classes to provide diversification of returns. The Scheme's investment manager will hold a mix of investments within its mandates which reflects its views relative to its respective benchmarks. The underlying assets in the Scheme's residual investment funds are predominantly in regulated markets. Any exposure to unregulated markets would be expected to provide diversification or risk reduction benefits.

Risk

The Scheme is exposed to a number of risks which pose a threat to the Scheme meeting its objectives. The principal risks affecting the Scheme are:

Funding risks

- Financial mismatch – The risk that Scheme assets fail to grow in line with the developing cost of meeting the Scheme's remaining uninsured liabilities as they accrue.
- Changing demographics –The risk that longevity improves and other demographic factors change, increasing the cost of the remaining uninsured Scheme benefits, as they accrue.
- Systemic risk - The possibility of an interlinked and simultaneous failure of several asset classes and/or investment managers, possibly compounded by financial 'contagion', resulting in an increase in the cost of

meeting the Scheme's liabilities. Climate change is a particular systemic risk that has the potential to cause economic, financial and demographic impacts.

The Trustee purchased the Policy which secures the vast majority of the Scheme's liabilities. All members covered by the Policy continue to be members of the Scheme, and the Trustee continues to have ultimate responsibility for payment of benefits to these members.

The Policy exposes the Scheme to a degree of insurance provider risk, i.e. the risk that PIC fail to meet their obligations to the Scheme and its members. The Trustee expects the insurance provider risk to be addressed through the supervisory regime applicable to insurance companies within the UK. The Trustee also monitors the monthly payments of benefits from the insurer to the Scheme. The Trustee will also meet regularly with PIC to discuss the firm's investment strategy, financial performance and administration of the Policy, amongst other considerations.

The Trustees keep mortality and other demographic assumptions, which could influence the cost of benefits, under review. These assumptions are considered formally at triennial valuations and the Trustees may enter into insurance contracts (bulk annuities or longevity swaps) to reduce these demographic risks.

Asset risks

- Concentration - The risk that a significant allocation to any single asset category and its underperformance relative to expectation would result in difficulties in achieving funding objectives.
- Illiquidity - The risk that the Scheme cannot meet its immediate liabilities because it has insufficient liquid assets.
- Currency risk – The risk that the currency of the Scheme's assets underperforms relative to Sterling (i.e. the currency of the liabilities).
- Manager underperformance - The failure by the fund managers to achieve the rate of investment return assumed in setting their mandates.
- Environmental, Social and Governance ("ESG") risks – the extent to which ESG issues are not reflected in asset prices and/or not considered in investment decision making leading to underperformance relative to expectations.
- Climate risk - The extent to which climate change causes a material deterioration in asset values as a consequence of factors including but not limited to policy change, physical impacts and the expected transition to a low-carbon economy.

The Trustee recognises that purchase of the Policy introduced some concentration and illiquidity (as the Policy cannot be sold) risk. However, given the contractual and regulatory protection associated with the Policy, the Trustee is comfortable that on balance, this is a suitable investment for the Scheme.

Across the residual assets, the risks are mitigated by investing across a range of liquid asset: gilts, corporate bonds and cash. The Trustee also monitors the Scheme's investments against its strategic asset allocation and mandate specific rebalancing ranges. Each of the mandates has a defined objective, performance benchmark and manager process which, taken in aggregate, constrain risk within the Trustee's expected parameters.

The decision to appoint only one investment manager to manage the residual assets does involve some degree of risk (from potential underperformance of that manager) which the Trustee accepts as a reasonable compromise given the size of the residual asset portfolio and the needs of the Scheme.

The Trustee does not expect the manager to take excess short term risk and will regularly monitor the manager's performance against the benchmarks and objectives set on a short, medium and long term basis.

The Trustee's approach to the consideration of ESG risks and climate risk is set out in further detail below.

Other provider risk

- Transition risk - The risk of incurring unexpected costs in relation to the transition of assets among managers.
- Custody risk - The risk of loss of Scheme assets, when held in custody or when being traded.
- Credit default - The possibility of default of a counterparty in meeting its obligations.

The Trustees monitor and manage risks in these areas through a process of regular scrutiny of its providers, and audit of the operations it conducts for the Scheme, or has delegated such monitoring and management of risk to the appointed investment manager as appropriate (e.g. custody risk in relation to pooled funds). When carrying out significant transitions, the Trustees seek professional advice.

Expected return on investments

The investment strategy aims to achieve a return on Scheme assets which is sufficient over time to match growth in the Scheme's pension liabilities and maintain the strong funding position.

Realisation of investments

The Scheme's residual assets (i.e. those not held in the Policy) are held in highly liquid funds and may be realised quickly if required.

The insurance contract with PIC is illiquid. This is recognised by the Trustee as it is not expected to be sold in the future.

Manager engagement

Performance Evaluation

The Trustees review the nature of Scheme investments on a regular basis, with reference to suitability and diversification. The Trustees seek and considers written advice from a suitably qualified person when determining the appropriateness of each manager and mandate for the Scheme, particularly in relation to diversification, risk, expected return and liquidity. If, at any time, investment in a security or product not previously known to the Trustees is proposed, appropriate advice is sought and considered to ensure its suitability.

The Trustees monitor its managers performance against their respective benchmark on a quarterly basis over a long-term time horizon. The manager is expected to provide explanation for any significant deviations away from benchmark.

Portfolio turnover

For the Scheme's residual assets, the Trustees have expectations of the level of turnover within each mandate which is determined at the inception of the mandate, based on the Trustees' knowledge of the manager, investment process and the nature of the portfolio. Whilst the Trustees expect performance to be delivered net of costs, including the costs of trading within the portfolio, the Trustees expect managers to report on at least an annual basis on the underlying assets held within the portfolio and details of any transactions over the period. The Trustees will challenge its managers if there is a sudden change in portfolio turnover or if the level of turnover seems excessive.

The Trustee will request turnover costs incurred by the asset manager over the Scheme reporting year.

Consideration of financially material factors in investment arrangements

The Trustees recognise that the consideration of financially material factors over the appropriate time horizon of the investments, including ESG factors, is relevant at different stages of the investment process.

Strategic considerations

The strategic benchmark for the residual assets has been determined using appropriate economic and financial assumptions from which expected risk/return profiles for different asset classes have been derived. These assumptions apply at a broad market level and are considered to implicitly reflect all financially material factors.

Given the inherent uncertainty, the Trustees have not made explicit allowance for the risks of climate change in setting their strategic benchmark.

Structural considerations

Given the discretion afforded to the Investment Manager, the Trustee expects that the Investment Manager will take account of all financially material factors including the potential impact of ESG factors in the implementation of their mandate.

Selecting investment managers

In passive mandates, the Trustees recognise that the choice of benchmark dictates the assets held by the investment manager and that the manager has minimal freedom to take account of factors that may be deemed to be financially material. The Trustees accept that the role of the passive manager is to deliver returns in line with the benchmark and believe this approach is in line with the basis on which their current strategy has been set. The Trustees will review the index benchmarks employed for the Scheme on at least a triennial basis.

In selecting new investment managers for the Scheme, where relevant to the investment mandate, the Trustees explicitly considers potential managers' approach to responsible investment and the extent to which managers integrate ESG issues in the investment process as a factor in their decision making.

The Trustees meet with the Scheme's investment manager regularly, and the manager is expected to address manager performance and company engagement. The manager will be challenged on their approach where this is not aligned to the Trustees' policies.

The Trustees expect its investment consultants to provide input and analysis to assist the Trustees in assessing their manager's performance. Where necessary, the Trustees will highlight any areas of concern identified during such reviews to the manager as part of its engagement process and request that the manager takes appropriate action. This may include concerns over performance, risk management, stewardship practices, investment process and operational issues and, where such concerns are raised, the Trustees will require the manager to demonstrate levels of improvement. Failure to achieve the desired improvements will result in the mandate being reduced or terminated.

Consideration of non-financially material factors in investment arrangements

Given the objectives of the Scheme, the Trustees have not considered any non-financially material factors in the development and implementation of their investment strategy. The Trustee has not imposed any restrictions or exclusions to the investment arrangements based on non-financially material factors.

Stewardship

The Trustees recognise that stewardship encompasses the exercise of voting rights, engagement by and with investment managers and the monitoring of compliance with agreed policies.

Voting and engagement

The Trustee has adopted a policy of delegating voting decisions to their Investment Manager on the basis that voting power will be exercised by them with the objective of preserving and enhancing long term shareholder value. The Investment Manager is expected to exercise the voting rights attached to individual investments in accordance with their own house policies and taking account of current best practice including the UK Stewardship Code.

On an annual basis, the Trustees will request their Investment Manager provides details of any change in their policies.

The Trustees annually reviews the investment manager's adherence to the UK Stewardship Code, UNPRI and other relevant industry codes or standards where applicable. In the event that a manager does not adhere to a recognised set of principles for responsible investment, the Trustees should take reasonable steps to ensure that they are comfortable with the policy that the manager has in place in respect of this.

The Trustees do not engage directly but believe it is appropriate for their investment managers to engage with key stakeholders which may include corporate management, regulators and governance bodies, relating to their investments in order to consider the management of conflicts of interest and improve corporate behaviours, improve performance and mitigate financial risks. Where necessary, the investment manager is expected to notify the Trustees of any issue on which it may be beneficial for the trustees to undertake further engagement. The Trustees will review engagement activity undertaken by their investment managers as part of its broader monitoring activity

Although PIC is solely responsible for management of the assets backing the Scheme's insurance policy (including any engagement with the underlying issuers), the Trustee will periodically discuss with the insurer its approach to stewardship, including voting and engagement activity as relevant.

Monitoring

The Trustees review manager voting activity on an annual basis in conjunction with their investment adviser. Where the Trustees deem it appropriate, any issues of concern will be raised with their manager for further explanation.

Additional Voluntary Contributions (AVCs)

The Trustee gives members the opportunity to pay AVCs to AEGON Scottish Equitable. A range of funds is available for investment at members' discretion.

Appendix 1: Asset Allocation Benchmark – residual assets

Asset Class	Benchmark Allocation
Income Assets	**0-35.0%**
Corporate Bonds	0-35.0%
Matching Assets	**65-100.0%**
Gilts	0-50% Allocation across Gilts, ILGs and cash to match any residual liabilities
Index-Linked Gilts	
Cash/ cash-like	0-100%

The Trustees will further refine the asset allocation over time as their objectives for any residual assets are confirmed.

Appendix 2: Version Control

Version	Commentary	Date
1.0	Original statement (Hymans format) incorporating Scheme ESG & RI commitments	June 2019
2.0	Statement updated for October 2020 regulatory requirements	June 2020
3.0	Asset allocation benchmark updated to reflect the Scheme's de-risking in December 2021 and equity fund consolidation in March 2022. The wording on the first Trustee objective (DB) has also been tweaked to reflect a 'favourable return' on passive index funds being misleading.	June 2022
4.0	Asset allocation benchmark updated to reflect the Scheme's equity de-risking in March 2023.	May 2023
5.0	Asset allocation benchmark updated to reflect the addition of corporate bonds to the Scheme's overall allocation.	December 2023
6.0	Updated to reflect buy-in contract with Pension Insurance Corporation	December 2025