Heinz Pension Plan (the 'Plan')

Statement of Investment Principles

PLAN INVESTMENT OBJECTIVE

The Trustee aims to invest the assets of the Plan prudently to ensure that the benefits promised to members are provided. In setting investment strategy, the Trustee first considered the lowest risk asset allocation that they could adopt in relation to the Plan's liabilities. The asset allocation strategy they have selected is designed to achieve a higher return than the lowest risk strategy while maintaining a prudent approach to meeting the Plan's liabilities.

STRATEGY

The current **planned asset allocation strategy** chosen to meet the objective above is set out in the table below. The Trustee will monitor the actual asset allocation versus the target weight and the ranges set out in the table below, although rebalancing decisions will be made with regards to the latest views on the relative valuations of the asset classes in which the Plan invests and the latest views on the capabilities of the Plan's investment managers.

The current target structure of the Plan is set out in the table below:

Asset Class	Target Ranges %
Global Equities	0-5
Multi Asset Credit	0-5
Low Risk Bonds	0-5
Liability Driven Investments (including Cash)	80-100

This Statement of Investment Principles is produced to meet the requirements of the Pensions Acts 1995 & 2004, the Occupational Pension Plans (Investment) Regulations 2005 and to reflect the Government's Voluntary Code of Conduct for Institutional Investment in the UK. The Trustee also complies with the requirements to maintain and take advice on the Statement and with the disclosure requirements.

The planned asset allocation strategy was determined with regard to the actuarial characteristics of the Plan, in particular the strength of the funding position and the liability profile.

The current target structure table (shown above) shows that part of the portfolio – targeted to be 80-100% - is invested in a range of Liability Driven Investment (LDI) funds and a cash fund, all of which are managed by BlackRock. The LDI portfolio is expected to fully protect the Plan from movements in interest rate and inflation expectations.

To assist in setting the strategy a full strategic review was carried out and advice provided from the Trustee's investment advisers. The Trustee recognises the potential volatility in equity returns, particularly relative to the Plan's liabilities, and the risk that the asset managers do not achieve the targets set. When choosing the Plan's planned asset allocation strategy, the Trustee considered advice from its investment advisers and, in doing so, addressed the following:

- The need to consider a full range of asset classes including private equity, property and hedge funds.
- The risks and rewards of a range of alternative asset allocation strategies.
- The suitability of each asset class.
- The need for appropriate diversification.

The Trustee also consulted with the sponsoring employer when setting this strategy.

RISK

The Trustee recognises that the key risk to the Plan is that it has insufficient assets to make provisions for 100% of its liabilities ("funding risk"). The Trustee has identified a number of risks which have the potential to cause a deterioration in the Plan's funding level and therefore contribute to funding risk. These are as follows:

- The risk of a significant difference in the sensitivity of asset and liability values to changes in financial and demographic factors ("mismatching risk"). The Trustee and its advisers considered this mismatching risk when setting the investment strategy.
- The risk of a shortfall of liquid assets relative to the Plan's immediate liabilities ("cash flow risk"). The Trustee and its advisers will manage the Plan's cash flows taking into account the timing of future payments in order to minimise the probability that this occurs.
- The failure by the asset managers to achieve the rate of investment return assumed by the Trustee ("manager risk"). This risk is considered by the Trustee and its advisers both upon the initial appointment of the asset managers and on an ongoing basis thereafter.
- The failure to spread investment risk ("risk of lack of diversification"). The Trustee and its advisers considered this risk when setting the Plan's investment strategy.
- The possibility of failure of the Plan's sponsoring employer ("covenant risk"). The Trustee and its advisers considered this risk as well as parent company guarantees when setting investment strategy and consulted with the sponsoring employer as to the suitability of the proposed strategy.
- The risk of fraud, poor advice or acts of negligence ("operational risk"). The Trustee has sought to minimise such risk by ensuring that all advisers and third party service providers are suitably qualified and experienced and that suitable liability and compensation clauses are included in all contracts for professional services received.

Due to the complex and interrelated nature of these risks, the Trustee considers the majority of these risks in a qualitative rather than quantitative manner as part of each formal investment strategy review (normally triennially). Some of these risks may also be modelled explicitly during the course of such reviews.

The Trustee's policy is to monitor, where possible, these risks quarterly. The Trustee receives regular reports showing:

- Actual funding level versus the Plan specific funding objective.
- Performance versus the Plan investment objective.
- Performance of individual asset managers versus their respective targets.
- Any significant issues with the asset managers that may impact their ability to meet the performance targets set by the Trustee.

IMPLEMENTATION

Aon has been selected as investment adviser to the Trustee. They operate under an agreement to provide a service which ensures the Trustee is fully briefed to take decisions themselves and to monitor those they delegate. Aon are paid on a time cost basis for all the work they undertake for the Plan although fixed fees may be negotiated by the Trustee for certain projects. This structure has been chosen to ensure that cost-effective, independent advice is received.

The fund manager structure and investment objectives for each fund manager ("mandates") are as follows:

Asset Managers	Objective
UBS	To deliver returns broadly in line with the benchmark (FTSE All Word Developed Hedged to GBP Index) while tilting portfolio constituents based on their expected contributions to climate change.
Aon Investments Limited	Multi Asset Credit: To target outperformance of its benchmark net of fees. The benchmark consists of a third each of ICE BofA 1-10 Year Global Corporate Index; ICE BofA Global High Yield, and ICE BofA US Emerging Markets Liquid Corporate Plus Index, all hedged back to GBP. Low Risk Bonds: To target a return of SONIA + 1.5% per annum.
BlackRock	Liability Driven Investment: Broadly fully hedge interest rate and inflation linked liabilities to the value of the Plan's assets. ICS Liquidity Fund Range: Maximise current income consistent with the preservation of principal and liquidity through the maintenance of a portfolio of high quality short-term "money market" instruments.

In addition, Additional Voluntary Contributions (AVC's) are managed by Aviva.

The Trustee has delegated all day-to-day decisions about the investments that fall within each mandate, including the realisation of investments, to the relevant fund manager through a written contract.

GOVERNANCE

The Trustee is responsible for the investment of the Plan's assets. The Trustee takes some decisions themselves and delegates others. When deciding which decisions to take themselves and which to delegate, the Trustee has taken into account whether they have the appropriate training and expert advice in order to take an informed decision. The Trustee has established the following decision-making structure:

<table>
<tr>
<td rowspan="2">Trustee
Monitor actual returns versus Plan investment objective.
Set structures and processes for carrying out their role.
Select and monitor planned asset allocation strategy.
Select investment adviser and asset managers.
Select and monitor direct investments (see below).
Monitor investment adviser and asset managers.
Monitor direct investments.</td>
<td>Asset Managers
Operate within the terms of this statement and their written contracts.
Select individual investments with regard to their suitability and diversification.
Advise Trustee on suitability of the indices in its benchmark.</td>
</tr>
<tr>
<td>Investment Adviser
Advise on all aspects of the investment of the Plan assets, including implementation.
Advise on this statement.
Provide required training.</td>
</tr>
</table>

The Pensions Act 1995 distinguishes between investments where the management is delegated to an asset manager with a written contract and those where a product is purchased directly, e.g. the purchase of an insurance policy or units in a pooled vehicle including AVC investments. The latter are known as **direct investments.**

The Trustee's policy is to review their direct investments and to obtain written advice about them (normally annually). When deciding whether or not to make any new direct investments the Trustee will obtain written advice and consider whether future decisions about those investments should be delegated to the asset managers.

The written advice will consider the issues set out in the Occupational Pension Plans (Investment) Regulations 2005 and the principles contained in this statement. The regulations require all investments to be considered by the Trustee (or, to the extent delegated, by the asset managers) against the following criteria:

- The best interests of the members and beneficiaries
- Security
- Quality
- Liquidity
- Profitability
- Nature and duration of liabilities
- Tradability on regulated markets
- Diversification
- Use of derivatives

The Trustee's investment adviser has the knowledge and experience required under the Pensions Act 1995.

The Trustee has appointed BNY Mellon Asset Servicing as the Plan's custodian. The custodian provides safekeeping for the Plan's segregated assets and performs the administrative duties attached, such as the collection of interest and dividends and dealing with corporate actions.

The Trustee will review this SIP at least every three years and immediately following any significant change in investment policy. The Trustee will take investment advice and consult with the Sponsoring Employer over any changes to the SIP.

Arrangements with Asset Managers

The Trustee monitors the Plan's investments to consider the extent to which the investment strategy and decisions of the asset managers are aligned with the Trustee's policies, including those on non-financial matters. This includes monitoring the extent to which asset managers:

- make decisions based on assessments about medium- to long-term financial and non-financial performance of an issuer of debt or equity; and
- engage with issuers of debt or equity in order to improve their performance in the medium- to long-term.

The Trustee is supported in this monitoring activity by their investment consultant.

The Trustee receives regular reports and verbal updates from the investment consultant on various items including the investment strategy, performance, and longer-term positioning of the portfolio. The Trustee focusses on longer-term performance when considering the ongoing suitability of the investment strategy in relation to the Plan objectives and assess the asset managers over 3-year periods.

The Trustee also receives annual stewardship reports on the monitoring and engagement activities carried out by their asset manager, which supports the Trustee in determining the extent to which the Plan's engagement policy has been followed throughout the year

The Trustee shares the policies, as set out in this SIP, with the Plan's asset managers, and request that the asset managers review and confirm whether their approach is in alignment with the Trustee's policies.

Before appointment of a new asset manager, the Trustee reviews the governing documentation associated with the investment and will consider the extent to which it aligns with the Trustee's policies. Where possible, the Trustee will seek to amend that documentation so that there is more alignment. Where it is not possible to make changes to the governing documentation, for example if the Plan invests in a collective vehicle, then the Trustee may express their expectations to the asset managers by other means (such as through a side letter, in writing, or verbally at trustee meetings).

The Trustee believes that having appropriate governing documentation, setting clear expectations to the asset managers by other means (where necessary), and regular monitoring of asset managers' performance and investment strategy, is in most cases sufficient to incentivise the asset managers to make decisions that align with the Trustee's policies and are based on assessments of medium- and long-term financial and non-financial performance.

Where asset managers are considered to make decisions that are substantially not in line with the Trustee's policies, expectations, or the other considerations set out above, the Trustee will typically first engage with the asset manager but could ultimately replace the asset manager where this is deemed necessary.

There is typically no set duration for arrangements with asset managers, although the continued appointment all for asset managers will be reviewed periodically, and at least every three years.

Asset Manager remuneration and costs

The Trustee is aware of the importance of monitoring their asset managers' total costs and the impact these costs can have on the overall value of the Plan's assets. The Trustee recognises that in addition to annual management charges, there are a number of other costs incurred by their asset managers that can increase the overall cost incurred by their investments.

The asset managers are typically remunerated on an ad valorem basis. The level of remuneration paid to the asset managers is reviewed annually by the Trustee against market rates to ensure the asset managers' interests are aligned with those of the Plan. In addition, asset managers may pay commissions to third parties on many trades they undertake in the management of the assets and also incur other ad hoc costs.

On an annual basis the Trustee asks all of their asset managers to provide full cost transparency data in line with the appropriate Cost Transparency Initiative ("CTI") data template, the new industry standard for institutional investment cost data. This allows the Trustee to understand exactly what it is paying their asset managers. The Trustee works with their investment adviser and asset managers to understand these costs in more detail where required.

Evaluation of performance and remuneration

The Trustee assesses the performance of their asset managers on a quarterly basis and the remuneration of their asset managers on at least an annual basis via collecting cost data in line with the CTI templates.

Portfolio turnover costs

The Trustee is aware of the portfolio turnover costs (portfolio turnover costs are defined as the costs incurred as a result of the buying, selling, lending or borrowing of investments) associated with their underlying investments through the information provided by their asset managers. The monitoring of the target portfolio turnover and turnover range is monitored annually with the assistance of the Plan's investment adviser.

The Trustee accepts that transaction costs will be incurred to drive investment returns and that the level of these costs varies across asset classes and by manager style within an asset class. In both cases, a high level of transaction costs is acceptable as long as it is consistent with the asset class characteristics, asset manager's style and historic trends and the asset manager delivers their expected return net of fees.

Where the disclosed costs are out of line with expectations the managers will be asked to explain the rationale, including why it is consistent with their investment strategy. Where the Trustee's monitoring identifies a lack of consistency the mandate will be reviewed.

The Trustee undertakes analysis of the Plan's costs and performance on at least a triennial basis by receiving benchmarking analysis comparing the Plan's specific costs and performance of the underlying managers relative to those of the wider market. This is in line with the Trustee's policies on reviewing the kinds and balance of investments to be held.

The Trustee is supported in its cost transparency monitoring activity by their investment adviser.

RESPONSIBLE INVESTMENT

In setting the Plan's investment strategy, the Trustee's primary concern is to act in the best financial interests of the Plan and its beneficiaries, seeking the best return that is consistent with a prudent and appropriate level of risk. The Trustee believes that in order to fulfil this commitment and to protect and enhance the value of the Plan's investments, it must act as a responsible steward of the assets in which the Plan invests.

Environmental, Social, and Governance considerations

The Trustee further acknowledges that an understanding of financially material considerations including environmental, social and corporate governance ("ESG") factors (such as climate change) and risks related to these factors can contribute to the identification of investment opportunities and financially material risks.

As part of their delegated responsibilities, the Trustee expects the Plan's investment managers to take into account corporate governance, social, and environmental considerations (including long-term risks posed by sustainability concerns including climate change risks) in the selection, retention and realisation of investments. Any decision should not apply personal ethical or moral judgments to these issues but should consider the sustainability of business models that are influenced by them.

The Trustee is taking the following steps to monitor and assess ESG related risks and opportunities:

- The Trustee will have periodic training on Responsible Investment to understand how ESG factors, including climate change, could impact the Plan's assets and liabilities.
- As part of ongoing monitoring of the Plan's asset managers, the Trustee will use ESG ratings information provided by Aon, where relevant and available, to monitor the level of the Plan's asset managers' integration of ESG on a quarterly basis.
- The Trustee will ask all the Plan's asset managers to provide their Responsible Investment policy and details of how they integrate ESG into their investment decision making process on an annual basis. Should the Plan look to appoint a new manager, where relevant and appropriate the Trustee will request this information as part of the selection process. All responses will be reviewed and monitored with input from the Plan's investment adviser.
- When reviewing asset allocation and strategic risks, the Trustee considers the implication of ESG risks, including climate change, using the available modelling tools, including deterministic scenarios.
- The Trustee will include ESG-related risks, including climate change, on the Plan's risk register as part of ongoing risk assessment and monitoring.

Stewardship - Voting and Engagement

The Trustee recognises the importance of its role as a steward of capital and the need to ensure the highest standards of governance and promoting corporate responsibility in the underlying companies in which its investments reside. The Trustee recognises that ultimately this protects the financial interests of the Plan and its beneficiaries.

The Trustee has delegated all voting and engagement activities to the Plan's investment managers. The Trustee accepts responsibility for how the managers steward assets on its behalf, including the casting of votes in line with each managers' individual voting policies. The Trustee reviews manager voting and engagement policies on an annual basis to ensure they are in line with the Trustee's expectations and in members' best interests. Prospective investment managers are also required to provide this information for the Trustee to review in advance of any new appointment.

The Trustee reviews the stewardship activities of their asset managers on an annual basis, covering both engagement and voting actions.

It is the expectation of the Trustee that the Plan's asset managers will provide transparency on engagement and voting. The transparency offered for engagements should include: objectives and relevance to the Plan, method of engagement, progress and perspectives around shortcomings, outcomes to date, escalation points and procedures as necessary. The transparency for voting should include voting actions and rationale with relevance to the Plan, in particular, where: votes were cast against management; votes against management generally were significant, votes were abstained; voting differed from the voting policy of either the Trustee or the asset manager. This engagement aims to ensure that robust active ownership behaviours, reflective of the Trustees' active ownership policies, are being actioned. This will take the form of annual reporting which will be made available to Scheme members.

From time to time, the Trustee will consider the methods by which, and the circumstances under which, it would monitor and engage with an issuer of debt or equity, an asset manager or another holder of debt or equity, and other stakeholders. The Trustee may engage on matters concerning an issuer of debt or equity, including its performance, strategy, risks, social and environmental impact and corporate governance, the capital structure, and management of actual or potential conflicts of interest.

Should the Trustee's monitoring process reveal that a manager's voting and engagement policies and actions are not aligned with the Trustee's expectations, the Trustee will engage, via different medium such as emails and meetings, with those managers to discuss how alignment may be improved to bring about the best long-term outcomes for the Plan.

Members' Views and Non-Financial Factors

The Trustee does not specifically take into account the views of Plan members and beneficiaries in relation to ethical considerations, social and environmental impact, or present and future quality of life of the members and beneficiaries of the Plan. The Trustee will review its policy towards this on a regular basis.

April 2026