Statement of Investment Principles

Danfoss UK Pension Scheme

April 2026

1. Introduction

Under Section 35 of the Pensions Act 1995 as subsequently amended by the Pensions Act 2004 (the 'Act'), the Occupational Pension Schemes (Investment) Regulations 2005 (the 'Investment Regulations'), the Occupational Pension Schemes (Charges and Governance) Regulations 2015 and the Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018, the Trustee is required to prepare a statement of principles governing decisions about investments for their pension funds. This Statement of Investment Principles (the **'SIP'**) describes the investment policy, guidelines and procedures being pursued by Danfoss UK Pension Scheme Trustee Limited, the **'Trustee'** of the Danfoss UK Pension Scheme (the **'Scheme'**). The Trustee believes this is in compliance with the Government's voluntary code of conduct for Institutional Investment in the UK (the 'Myners Principles'). This SIP has also been drafted in a manner to reflect the requirements of the **'Investment Regulations'**.

In accordance with the Act, the Trustee confirms that before preparing the SIP, they have obtained and considered written advice from SEI Investments (Europe) Limited in their role as fiduciary manager of the Scheme (the **'Fiduciary Manager'**). The Trustee believes SEI to be qualified by their ability and practical experience of financial matters and to have appropriate knowledge and experience of the management of the investments of schemes such as the Scheme.

The Trustee has also consulted with Danfoss Holdings (UK) Limited, the Principal Employer of the Scheme (the **'Employer'**), in preparing the SIP, and the Trustee will consult the employer before revising this document further.

The Trustee will review the SIP, in consultation with the Fiduciary Manager, at least every three years; and without delay after any significant change in investment policy or the circumstances of the Scheme.

The Trustee is responsible for the investment of the Scheme's assets in the best interests of members and beneficiaries, and it exercises its powers of investment in accordance with the trust deed and rules of the Scheme and applicable law. The Trustee also arranges the administration of the Scheme. When required to make an investment decision, the Trustee first receives and considers advice from the Fiduciary Manager. The Trustee believes that this ensures that they are appropriately familiar with the issues concerned.

In accordance with the Financial Services and Markets Act 2000 (FSMA), the Trustee is responsible for setting a general investment policy but it has delegated the day-to-day investment decisions and investment management of the Scheme's assets to the Fiduciary Manager, who has been appointed under Section 36 of the Act. In turn, the Fiduciary Manager has delegated certain investment roles to companies within the wider SEI group (**'SEI'**). SEI and other third-party asset managers are, where appropriate, used within the Scheme's portfolio either as investment managers of pooled funds or as asset managers within multi-manager pooled funds.

The Fiduciary Management and Custody Agreement (the **'Agreement'**) sets out the scope of the Fiduciary Manager's duties together with fees, investment restrictions and any other relevant matters in relation to the Scheme. The Fiduciary Manager is authorised and regulated by the Financial Conduct Authority (FCA) and provides the skill and expertise

necessary to manage the investments of the Scheme competently and in accordance with the terms of the Fiduciary Management Agreement and the principles of this SIP.

The Trustee will monitor the performance of the Fiduciary Manager against the agreed performance objectives. The Trustee will regularly review the activities of the Fiduciary Manager to ensure they continue to perform in a competent manner and have the appropriate knowledge and experience to manage the assets of the Scheme.

The Fiduciary Manager has been provided with a copy of this SIP and is aware that it is required to exercise its powers with a view to giving effect to the principles contained herein and in accordance with subsection (2) of Section 36 of the Pensions Act 1995.

2. Investment objective

The Trustee's primary objectives in respect of the defined benefit (DB) assets are:

- To make sure that, together with contributions from the Employer, the assets can meet the Scheme's obligations to the beneficiaries of the Scheme;
- To strike an acceptable balance between the stability of funding and the long-term cost of benefit provision; and
- To achieve, over the long term, a rate of investment return sufficient to outperform the growth of the Scheme's liabilities and reach full funding on an appropriate basis while only taking the level of risk required to achieve this objective with a reasonable degree of certainty.

3. Choosing investments

The Trustee has delegated the management of the investment portfolio to the Fiduciary Manager. When choosing investments, the Fiduciary Manager is required to have regard to the criteria for investment set out in the Investment Regulations, the Occupational Pension Scheme (Charges and Governance) Regulations 2015 and the principles contained in this statement.

To support the objectives, the Scheme's assets are invested *primarily* in a liquid portfolio of UK government bond (gilt) and liability-driven investments (LDI) funds, designed to closely track movements in the Scheme's liabilities on a proxy buyout basis and preserve the funding position on this basis. The portfolio is structured to hedge the interest rate and inflation risk inherent in the liabilities on a proxy buyout basis. The strategy is designed to minimise funding volatility, protect the Scheme's readiness for buyout, and ensure assets can be readily realised to meet insurer pricing and transaction requirements.

The Scheme's investments are implemented via pooled funds.

4. Kinds of investments

The investments in each fund will depend on the nature of the fund, its objective and benchmark and the risk controls which operate. If the Trustee were to impose any restrictions on types of investments, this would be reflected within the Fiduciary Management Agreement.

The Trustee has determined that derivatives or other financial instruments may be used to hedge the Scheme's liability risks (principally interest rate and inflation risks). In addition, derivatives may be used within pooled funds for the purpose of efficient portfolio management. At any given time, a minimum level of assets of sufficient liquidity and quality will be held to ensure the Scheme is able to satisfy collateral or margin calls, which may arise as a result of the derivatives positions it holds.

5. Balance between different kinds of investments

The target asset allocation consists *primarily* of pooled gilt and LDI funds. The portfolio has been constructed to hedge the Scheme's liabilities on a proxy buyout basis.

The range of, and any limitation on the proportion of, the Scheme's assets held in any asset class will be agreed between the Fiduciary Manager and the Trustee. These ranges and sets of limitations are specified in the Fiduciary Management Agreement and may be revised from time to time where considered appropriate.

6. Risks, including the ways in which risks are to be measured and managed

The Trustee recognises a number of risks involved in the investment of the assets of the Scheme and monitors these risks on a regular basis. The key identified risks are as follows:

Custody risk – The Trustee will assess and consider the actions of the custodian of the Scheme's assets, SEI Global Nominees Limited, at the outset and on an ongoing basis to mitigate the risk of misappropriation of assets, delivery that is not in accordance with the instructions, unauthorised use of assets for the benefits of other customers of the custodian, inadequate segregation of customer assets, failure to collect income, recover tax or respond to corporate events and custodian default. The Custodian ring fences the Scheme assets from its own and those of its other clients.

Cashflow risk – The risk of a shortfall of liquid assets relative to the immediate liabilities. The Trustee and their advisers will manage the Scheme's cash flows taking into account the timing of future payments and may borrow over the short-term in order to minimise the probability that this occurs.

Demographic risk – Demographic factors include the uncertainty surrounding mortality projections such as future improvements in mortality experience. The Trustee will measure liabilities using mortality assumptions recommended by the Scheme Actuary.

Manager risk – The failure by the Fiduciary Manager to achieve the rate of investment return assumed by the Trustee. This issue has been considered by the Trustee on the initial appointment of the Fiduciary Manager and thereafter will be considered as part of the investment review procedures the Trustee has put in place.

Concentration risk – The risk that the performance of any single asset class or single investment that constituted a significant proportion of the assets would disproportionately influence the ability of the Trustee to meet the objectives. To support the objectives, the Scheme has de-risked into a portfolio consisting *primarily* of gilt and LDI funds, which is intended to track the Scheme's liabilities on a proxy buyout basis.

Credit risk – The risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation. The Trustee limits the risk by restricting the Scheme's exposure to investments with high credit risk and by ensuring that credit risk is well diversified across a number of counterparties.

Market risk – The risk that the fair value or the future cash flows of a financial instrument will fluctuate because of changes in market prices. This includes the risk of changes in interest rates, inflation and currency rates. The Trustee will monitor the performance and ratio of assets in relation to these risks.

The Trustee will keep these risks under regular review. The management of investment risk is a function of the asset allocation and diversification strategies and implementation of that strategy is delegated to the Fiduciary Manager.

7. Expected return on investments

A return on investments is required which, over the long term, is expected to be consistent with the goal of the Trustee meeting the Statutory Funding Objective and eventually buying out the Scheme's liabilities with an insurer. The Trustee will monitor the performance of the Scheme's assets against liabilities and the performance of the Fiduciary Manager against the agreed objectives.

8. Realisation of investments

The Trustee is aware of the importance of fund liquidity and the risk that core financial transactions are not processed promptly due to lack of liquidity in the investments. The preference of the Trustee is for investments that are readily realisable but recognises that achieving a well-diversified portfolio may mean holding some investments that are less liquid (e.g. property).

The Trustee will ensure that the Fiduciary Manager is made aware of the cashflow requirements of the Scheme. The Fiduciary Manager will be responsible for ensuring that, in normal market conditions, sufficient assets are readily realisable to meet any disinvestments required by the Trustee to meet these cashflows.

9. Financially material considerations

The Trustee has considered how financially material considerations (including environmental, social and governance ('ESG') factors such as climate change) should be taken into account in the selection, retention and realisation of investments, given the long-term nature of the Scheme's liabilities. The Trustee considers that the appropriate time horizon over which such considerations should be assessed is aligned with its long-term funding objectives.

The Trustee has delegated asset manager selection to the Fiduciary Manager. The Fiduciary Manager will seek to appoint asset managers that have appropriate skills and processes to take account of financially material considerations in the selection, retention and realisation of investments, and regularly reviews how its asset managers are doing so in practice. The Trustee expects the Fiduciary Manager to provide updates on the latest position on ESG factors and any material decisions that have been taken by SEI or third-party asset managers as a result of considering such issues.

10. Non-financially material considerations

The Trustee has decided not to take non-financial considerations into account in the selection, retention and realisation of investments. For this purpose, "non-financial matters" means the views of the members and beneficiaries including (but not limited to) their ethical views and their views in relation to social and environmental impact and present and future quality of life of the members and beneficiaries of the Scheme. In reaching this decision, the Trustee has considered both the challenges of engaging a properly representative sample of members and the strong likelihood of a lack of consensus among those most likely to respond to such a consultation.

11. Voting, stewardship & engagement

To support the objectives, the Scheme has de-risked into a portfolio consisting *primarily* of gilt and LDI funds, which is intended to track the Scheme's liabilities on a proxy buyout basis.

Therefore, in practice, the scope for voting, stewardship and engagement is limited, as the underlying investments do not confer traditional equity voting rights.

The Trustee nevertheless expects investment managers to act as responsible stewards of capital and to integrate environmental, social and governance (ESG) considerations where relevant to risk management.

The Fiduciary Manager is a signatory to the 2020 UK Stewardship Code, and will report on its wider voting, stewardship and engagement activity to the Trustee on a periodic basis, together with its adherence to the UK Stewardship Code.

Additional Voluntary Contributions (AVCs)

Some members obtain further benefits by paying AVCs into the Scheme. The liabilities in respect of these AVCs are equal to the value of the investments bought by the contributions. The Trustees' objective is to provide a range of funds, which will provide a suitable long-term return for members, consistent with members' reasonable expectations.

The Trustees have selected a range of investment funds for the AVCs to be invested in. The Trustees review these arrangements regularly, having regard to their performance, the objectives and the views of the Defined Contribution Advisers:

- AEGON
- Clerical Medical
- Utmost Life and Pensions Limited
- Phoenix Life Ltd
- Standard Life

12. Asset manager arrangements

<u>Incentivising and monitoring managers to align with Trustee's investment strategy</u>

The Fiduciary Manager is incentivised to align its investment strategies with the Trustee policies mentioned in this SIP through the terms set out in the Fiduciary Management

Agreement and through the Trustee setting investment objectives which are reviewed annually. The Trustee will monitor performance quarterly and assess performance against these investment objectives annually. Such review will also include how well the Fiduciary Manager is aligned with the SIP, including in terms of ESG factors and the quality of service provided.

If the Fiduciary Manager does not meet its objectives, it may ultimately result in the termination of its mandate. The agreement with SEI allows the Trustee to terminate with one month's notice.

SEI engages third party asset managers either through the use of third-party pooled funds or through the appointment of asset managers within multi-manager pooled funds.

SEI will monitor the asset managers' performance on an ongoing basis against the particular investment strategy and objectives agreed with that manager. Where an asset manager is not performing or acting in a manner SEI feels is appropriate it may ultimately result in the termination of their mandate.

The fees paid to the Fiduciary Manager, and the possibility of their mandate being terminated, ensure they are incentivised to provide a high-quality service that meets the stated objectives, guidelines and restrictions of the Scheme. The Fiduciary Manager is responsible for fee arrangements with asset managers, the costs of which are borne directly by the Scheme.

Monitoring portfolio turnover and costs

The Trustee has delegated the monitoring of the costs incurred by asset managers in the buying, selling, lending or borrowing of investments to the Fiduciary Manager.

The Trustee recognises that portfolio turnover (being the frequency with which the assets are expected to be bought/sold) and associated transaction costs are a necessary part of investment management and that the impact of portfolio turnover costs is reflected in performance figures provided by the Fiduciary Manager. However, the Fiduciary Manager will incorporate portfolio turnover and resulting transaction costs in its advice on the Scheme's investment mandates. When the Trustee agrees a particular strategy and investment mandate, this will then set an expected level of turnover and transaction costs. The Trustee reviews and monitors the actual level of the costs and turnover against this expected level.

Duration of asset manager agreements

The agreement with the Fiduciary Manager has an indefinite term but can be terminated by the Trustee giving one month's notice. The Scheme does not have any direct agreements with third party managers used by the Fiduciary Manager.

13. Declaration

The Trustee confirms that this SIP reflects the investment strategy it has implemented for the Scheme. The Trustee acknowledges that it is their responsibility, with guidance from SEI, the Fiduciary Manager, to ensure the assets of the Scheme are invested in accordance with these principles.

For and on behalf of Danfoss UK Pension Scheme Trustee Limited.