

# Annual statement regarding governance of the Defined Contribution Section of the Avon Rubber Retirement and Death Benefits Plan ('the Plan')

## **Background**

*The Occupational Pension Schemes (Scheme Administration) Regulations 1996 ("the Administration Regulations") require the Trustee Directors to prepare an annual statement regarding governance and include this in the annual Trustee's report and accounts. The governance requirements apply to all Defined Contribution (DC) pension arrangements and aim to help members achieve a good outcome from their pension savings.*

## **Introduction**

As the Trustee Chair, I am pleased to provide you with our annual statement which explains what steps have been taken by the Trustee Directors ('the Trustee'), with the help of our professional advisers, to meet the governance standards that apply to the DC Section of the Plan.

This statement issued by the Trustee covers the period from 1 April 2023 to 31 March 2024 and is signed on behalf of the Trustee by the Chair.

This statement covers governance and charge disclosures in relation to the following:

1. The Default arrangement
2. Net investment returns
3. Member borne charges and transaction costs
  - i. Default arrangement
  - ii. Self-select funds
  - iii. Illustrations of the cumulative effect of these costs and charges
4. Value for members assessment
5. Processing of core financial transactions
6. Trustee knowledge and understanding

### **1. The Default Arrangement**

**The Trustee is required to design the default arrangement in members' interests and keep it under review. The Trustee needs to set out the aims and objectives of the default arrangement and take account of the level of costs and the risk profile that are appropriate for the Plan's membership.**

The Plan is used as a Qualifying Scheme for auto-enrolment purposes.

The Trustee is responsible for the Plan's investment governance, which includes setting and monitoring the investment strategy for the Plan's default arrangement: the Standard Life Sustainable Multi Asset Universal Strategic Lifestyle Profile ('the Sustainable Multi Asset Strategy').

The Sustainable Multi Asset Strategy is primarily provided for members who join the Plan and do not choose an investment option for their contributions. It is intended to be appropriate regardless of how members take their benefits at retirement.

The objectives for the default arrangement are as follows:

- Aim for significant long term real growth while members are further away from retirement.
- Manage down volatility in fund values as members near retirement.
- Target an end point portfolio that is appropriate with how members may take their benefits when they retire.

Full details of the objectives and the Trustee's policies regarding the default arrangement can be found in a document called the 'Statement of Investment Principles' (SIP) which is attached to the end of this statement and is also available in the useful documents section on the DC section of the Company's website here: [Avon Protection plc | Defined contribution scheme \(avon-protection-plc.com\)](https://www.avon-protection-plc.com).

### **Investment strategy review**

The Trustee Directors are responsible for setting and monitoring the investment strategy for the Plan, including the default arrangement.

The default arrangement was not formally reviewed during the period covered by this statement.

The last review formally concluded on 23 March 2023. The review considered the Trustee's objectives and the suitability of the default arrangement and other fund options with reference to the membership demographics and how members access their benefits, as well as industry data and wider trends, and investment performance. The Trustee was supported in this exercise by the Plan's DC investment adviser, Aon.

The Trustee will continue to monitor the Plan's investments. The next formal review of the default arrangement is due to take place before 23 March 2026.

### **Specified performance based-fees**

Where a fee is calculated by reference to a fund's performance and is not calculated by reference to the value of the member's DC pension savings, the Trustee must state the amount of any such performance-based fees in relation to each default arrangement.

During the Plan Year there have been no such performance-based fees payable.

### **Performance Monitoring**

The Trustee also reviews the performance of the default arrangement against its aims and objectives as part of the investment strategy review and on a quarterly basis. Performance of the funds is reviewed in absolute terms and relative to comparable DC investment strategies.

The Trustee is satisfied that the default arrangement has performed in line with its aims and objectives as detailed in the SIP.

## Default arrangement asset allocation

The Trustee is required to disclose their full asset allocations of investments for each default arrangement. The table below shows the percentage of assets allocated in the default arrangement to specified asset classes as at 31 March 2024.

Asset class	Asset allocation as at 31 March 2024			
	25 years old	45 years old	55 years old	65 years old
<b>Cash</b>	0.0%	0.0%	0.0%	4.9%
<b>Bonds</b>				
<i>Corporate bonds</i>	8.4%	8.4%	25.8%	40.8%
<i>Fixed interest government bonds</i>	0.7%	0.7%	1.1%	4.1%
<i>Index-linked government bonds</i>	0.7%	0.7%	2.2%	1.5%
<i>Other bonds</i>	4.6%	4.6%	8.6%	10.0%
<b>Listed equities</b>				
<i>UK equities</i>	8.0%	8.0%	5.7%	3.4%
<i>Developed market equities (excluding UK)</i>	67.0%	67.0%	48.0%	28.8%
<i>Emerging markets</i>	4.4%	4.4%	3.2%	1.9%
<b>Private equity</b>	0.0%	0.0%	0.0%	0.0%
<b>Infrastructure</b>	0.0%	0.0%	0.0%	0.0%
<b>Property</b>	6.2%	6.2%	5.4%	4.6%
<b>Private debt</b>	0.0%	0.0%	0.0%	0.0%
<b>Other</b>	0.0%	0.0%	0.0%	0.0%

## 2. Net investment returns

The Trustee is required to report on net investment returns for each default arrangement and for each non-default fund which members were invested in during the Plan year. Net investment returns refers to the returns on funds minus all member-borne transaction costs and charges.

The net investment returns have been prepared having regard to statutory guidance.

It is important to note that past performance is not a guarantee of future performance.

Performance has been shown at ages 25, 45 and 55 for members in the default arrangement and additional lifestyle arrangements in line with statutory guidance. For members in the lifestyle arrangements, members are assumed to have a target retirement age of 65.

**(i) Default arrangement – (Standard Life Sustainable Multi Asset Universal SLP Lifestyle Strategy)**

<b>Performance to 31 March 2024</b>	<b>Annualised returns (% p.a.)</b>
Age of member at start of reporting period	1 year
25	16.5
45	16.5
55	14.8

Source: Standard Life

Performance has not been shown over 5 years given members have only been invested in this strategy since October 2022.

**(ii) Self-select investments**

**Standard Life Sustainable Multi Asset Universal (10 Year) Strategic Lifestyle Profile (closed to new investors)**

<b>Performance to 31 March 2024</b>	<b>Annualised returns (% p.a.)</b>
Age of member at start of reporting period	1 year
25	15.2
45	15.2
55	15.2

Performance has not been shown over 5 years given members have only been invested in this strategy since October 2022.

**Individual funds**

<b>Performance to 31 March 2024</b>	<b>Annualised returns (% p.a.)</b>	
<b>Fund name</b>	<b>1 year</b>	<b>5 years</b>
SL BlackRock ACS World ex UK Equity Tracker Pension Fund	25.0	13.3
SL Blackrock ACS Continental European Equity Tracker Pension Fund	13.3	9.9
SL Schroder Global Emerging Markets Pension Fund	4.6	3.2
SL Vanguard US Equity Pension Fund	28.1	15.4
SL ASI UK Smaller Companies Pension Fund	5.3	2.1
SL iShares Pacific ex Japan Equity Index Pension Fund	8.7	7.4
SL iShares UK Equity Index Pension Fund	8.0	5.1
Standard Life Money Market Pension Fund	5.0	1.5
Sustainable Multi Asset Growth (10 Year) Pension Fund	15.2	5.5
Sustainable Multi Asset Pre Retirement (Universal 10 Year) Pension Fund	11.0	3.6

Sustainable Multi Asset At Retirement (Universal 10 Year) Pension Fund	10.3	3.2
Standard Life Sustainable Multi Asset Growth Pension Fund	16.5	-
Standard Life Sustainable Multi Asset Pre Retirement Pension Fund	13.6	-
Standard Life Sustainable Multi Asset At Retirement Pension Fund	10.3	-

Source: Standard Life

### 3. Member Borne Charges and Transaction costs

The Trustee should regularly monitor the level of charges borne by members through the investment funds. These charges comprise:

- **Charges:** these are explicit, and represent the costs associated with operating and managing an investment fund. They can be identified as a Total Expense Ratio (TER), or as an Annual Management Charge (AMC), which is a component of the TER;
- **Transaction costs:** these are not explicit, and are incurred when the Plan's fund manager buys and sells assets within investment funds but are exclusive of any costs incurred when members invest in or sell out of funds.

The Trustee is also required to confirm that the total costs and charges paid by any member in the default arrangement have not exceeded 0.75% p,a, (the charge cap) and produce an illustration of the cumulative effect of the overall costs and charges on members' retirement fund values as required by the Occupational Pension Schemes (Administration and Disclosure) (Amendment) Regulations 2018.

The Total Expense Ratio (TER) is a measure of the total cost to the member associated with managing and operating a fund. These operating expenses may include management fees, legal fees, auditor fees and other administrative costs. In a lifestyle strategy, like the default arrangement, the TER payable is dependent on how far a member is from their selected retirement age.

Transaction costs are those costs incurred by the fund within the day-to-day management of the assets. They cover such things as the cost of buying and selling securities within the fund. These costs are incurred on an ongoing basis, are an inevitable consequence of managing the fund and are in addition to the TER.

Standard Life has provided transaction cost information for the period covered by this statement and this information is included in the tables below along with the TERs for each of the funds used by the Plan. Where transaction costs have been provided as a negative cost, these have been set to zero by the Trustee to avoid potentially understating the total level of costs and charges.

**(i) Default arrangement - Standard Life Sustainable Multi Asset Universal Strategic Lifestyle Profile**

	<b>Total Expense Ratio (% p.a.)</b>	<b>Transaction Costs % p.a.</b>	<b>Total costs % p.a.</b>
<b>Sustainable Multi Asset Universal Strategic Lifestyle Profile</b>			
Standard Life Sustainable Multi Asset Growth Pension Fund	0.29	0.06	0.35
Standard Life Sustainable Multi Asset Pre Retirement Pension Fund	0.28	0.11	0.39
Standard Life Sustainable Multi Asset At Retirement Pension Fund	0.28	0.16	0.44

The Standard Life Sustainable Multi Asset Universal Strategic Lifestyle Profile has been set up as a lifestyle arrangement which means that members' assets are automatically moved between different investment funds as they approach their target retirement date.

The TER that a member paid over the year depends on their term to retirement. The TER ranges from 0.28% p.a. to 0.29% p.a. which is below the 0.75% charge cap for schemes that are used for auto-enrolling their employees. Transaction costs ranged between 0.06% p.a. and 0.16% p.a. with the total cost associated with the Sustainable Multi Asset Universal Strategic Lifestyle Profile over the year between 0.35% p.a. and 0.44% p.a.

**(ii) Self-select investment funds**

In addition to the Sustainable Multi Asset Universal Strategic Lifestyle Profile members also have the option to invest in a further three<sup>1</sup> lifestyle strategies, and a range of individual funds. The TERs and transaction costs for each of the funds in which members' funds were invested during the year are shown in the following table. Members can also invest in either of the funds that form the default arrangement shown above on a self-select basis.

	<b>Total Expense Ratio (% p.a.)</b>	<b>Transaction Costs % p.a.</b>	<b>Total costs % p.a.</b>
<b>Standard Life Sustainable Multi Asset Universal (10 Year) Strategic Lifestyle Profile</b>			
Sustainable Multi Asset Growth (10 Year) Pension Fund	0.28	0.08	0.36
Sustainable Multi Asset Pre Retirement (Universal 10 Year) Pension Fund	0.28	0.13	0.41
Sustainable Multi Asset At Retirement (Universal 10 Year) Pension Fund	0.29	0.14	0.43
<b>Individual funds</b>			
Vanguard US Equity Pension Fund	0.31	0.00	0.31
Standard Life Money Market Pension Fund	0.30	0.00	0.30

	<b>Total Expense Ratio (% p.a.)</b>	<b>Transaction Costs % p.a.</b>	<b>Total costs % p.a.</b>
ASI UK Smaller Companies Pension Fund <sup>2</sup>	0.77	0.24	1.01
BlackRock ACS World ex UK Equity Tracker Pension Fund	0.31	0.06	0.37
iShares Pacific ex Japan Equity Index Pension Fund	0.32	0.10	0.42
Schroder Global Emerging Markets Pension Fund	1.26	0.32	1.58
Blackrock ACS Continental European Equity Tracker Pension Fund	0.31	0.02	0.33
iShares UK Equity Index Pension Fund	0.30	0.07	0.37

<sup>1</sup> Standard Life do not offer reporting on funds that did not hold member assets during the year. Therefore, only funds that held member assets during the year are reported. As a result, reporting on some self-select funds offered to members and the following alternative lifestyles offered by the Plan has not been provided:

- Standard Life Sustainable Multi Asset Annuity Strategic Lifestyle Profile
- Standard Life Sustainable Multi Asset Lump Sum Strategic Lifestyle Profile
- Standard Life Sustainable Multi Asset Drawdown Strategic Lifestyle Profile

<sup>2</sup>The fund is closed to new contributions, but accrued assets are maintained; allowing for redemptions only.

### **(iii) Illustration of the cumulative effect of costs and charges**

**From 6 April 2018 the Occupational Pension Schemes (Administration and Disclosure) (Amendment) Regulations 2018 introduced new requirements relating to the disclosure and publication of the level of costs by the trustees and managers of a relevant scheme. These changes are intended to improve transparency on costs.**

The following tables set out an illustration of the effect of charges and transaction costs on the projection of an example member's pension savings.

The "before charges" figures represent the savings projection assuming an investment return with no deduction of member borne fees or transaction costs. The "after charges" figures represent the savings projection using the same assumed investment return but after deducting member borne fees and making an allowance for transaction costs. The "impact of charges" figures represent the difference between the before and after charges figures.

The transaction cost figures have been averaged over a two year period for funds forming the default arrangement and over four years for other funds in line with statutory guidance to reduce the level of volatility, and a floor of 0% p.a. has been used for the transaction costs if these were negative in any year so as not to potentially understate the effect of charges on fund values over time.

The illustration is shown for the following

- Sustainable Multi Asset Universal Strategic Lifestyle Profile (the default arrangement)
- Sustainable Multi Asset Growth (10 Year) Pension Fund (CCHD) (the lowest cost fund available on a self-select basis)
- SL Schroder Global Emerging Markets Pension Fund (the highest cost fund available on a self-select basis)

The illustrations have been prepared having regard to statutory guidance, selecting a suitable representative member on joining the Plan, and are based on a number of assumptions about the future which are set out following the illustrations.

Members should be aware that such assumptions may or may not hold true, so the illustrations do not promise what could happen in the future and fund values are not guaranteed. Furthermore, because the illustrations are based on a typical member of the Plan on joining the Plan, they are not a substitute for the individual and personalised illustrations which are provided to members in their Annual Benefit Statements.

**Notes:** The Projected pension pot values are shown in today's terms and do not need to be reduced further for the effect of future inflation.

- Example member starting age is: 18
- Annual salary growth and inflation: 2.5% each year
- Example member's starting fund size: £0
- Example member's starting salary: £25,000
- Example member's total contributions: 15% per year
- Age at which example member's benefits are taken: 65

Values shown are estimates and are not guaranteed.

<b>Projected Pension Account in today's money</b>									
<b>Age</b>	<b>Sustainable Multi Asset Universal Strategic Lifestyle Profile (default investment arrangement)</b>			<b>Sustainable Multi Asset Growth (10 Year) Pension Fund (lowest cost self-select fund)</b>			<b>SL Schroder Global Emerging Markets Pension Fund (highest cost self-select fund)</b>		
	<b>Before charges</b>	<b>After charges</b>	<b>Effect of charges</b>	<b>Before charges</b>	<b>After charges</b>	<b>Effect of charges</b>	<b>Before charges</b>	<b>After charges</b>	<b>Effect of charges</b>
<b>18</b>	0	0	0	0	0	0	0	0	0
<b>20</b>	7,590	7,570	20	7,590	7,560	30	7,590	7,480	110
<b>25</b>	28,240	27,930	310	28,240	27,880	360	28,240	26,850	1,390
<b>30</b>	51,540	50,540	1,000	51,540	50,400	1,140	51,540	47,190	4,350
<b>35</b>	77,820	75,640	2,180	77,820	75,350	2,470	77,820	68,570	9,250
<b>40</b>	107,470	103,520	3,950	107,470	103,000	4,470	107,470	91,030	16,440
<b>45</b>	140,910	134,480	6,430	140,910	133,640	7,270	140,910	114,620	26,290
<b>50</b>	178,630	168,870	9,760	178,630	167,590	11,040	178,630	139,410	39,220
<b>55</b>	221,190	206,850	14,340	221,190	205,210	15,980	221,190	165,460	55,730
<b>60</b>	269,190	248,510	20,680	269,190	246,890	22,300	269,190	192,830	76,360
<b>65</b>	323,340	294,280	29,060	323,340	293,080	30,260	323,340	221,580	101,760

#### **Assumed Growth Rates:**

##### **Underlying funds**

Sustainable Multi Asset Growth Pension Fund<sup>1</sup>  
Sustainable Multi Asset Pre Retirement Pension Fund<sup>1</sup>

##### **Assumed growth rate (% p.a.)**

5.0%  
5.0%



<b>Underlying funds</b>	<b>Assumed growth rate (% p.a.)</b>
Sustainable Multi Asset At Retirement Pension Fund <sup>1</sup>	5.0%
Sustainable Multi Asset Growth (10 Year) Pension Fund:	5.0%
SL Schroder Global Emerging Markets Pension Fund:	5.0%

<sup>1</sup> Funds underlying the Sustainable Multi Asset Universal Strategic Lifestyle Profile (default arrangement)

#### **4. Value for Members assessment**

**The Trustee is required to make an assessment of charges and transactions costs borne by members and the extent to which those charges and costs represent good value for money for members.**

The Trustee is required to make an annual assessment of charges and costs borne by the members and the extent to which they represent good value for members. To do this, the Trustee has developed a framework which looks at the member-borne charges and the benefits of membership so it can assess whether members are getting good value.

The costs have been identified as TER and transaction costs and are set out in section 3 of this statement. The Trustee has considered the benefits of membership under the following five categories: governance, investments, administration, retirement support and member communications. Benchmarking relative to other pension arrangements or industry best practice guidelines is also undertaken.

The Trustee's beliefs have formed the basis of the analyses of the benefits of membership. These are set out below along with the main highlights of their assessment.

##### Governance

The Trustee believes in having robust processes and structures in place to support effective management of risks and ensure members interests are protected, increasing the likelihood of good outcomes for members.

The Trustee has adequate processes and structures in place to support effective oversight and management of all aspects of the Plan.

The Trustee Directors undertake regular and appropriate training to ensure they can continue to fulfil their responsibilities.

##### Investments

The Trustee believes that a well-designed investment portfolio that is subject to regular performance monitoring and assessment of suitability for the membership will make a significant contribution to the delivery of good member outcomes.

The Plan offers a variety of strategies and funds covering a range of member risk profiles, asset classes and management styles. The investment strategy has been designed, following advice from the Trustee's investment adviser, with the specific needs of members in mind.

The investment strategy is subject to quarterly review to ensure its continued appropriateness. The Trustee is supported in this ongoing review by their investment adviser.

## Administration

The Trustee believes that good administration and record keeping play a crucial role in ensuring that scheme members receive the retirement income due to them. In addition, that the type and quality of service experienced by members has a bearing on the level of member engagement.

The Trustee obtains information to help assess and monitor the quality of the administration service. This includes reviewing quarterly administration reports and having discussions with the administrator.

The administrator has reported satisfactory levels of service during the year.

## Member Communications and Retirement Support

The Trustee believes that effective member communications and delivery of the right support and tools helps members understand and improve their retirement outcomes.

The Trustee provides members with annual briefings and workshops. Standard Life provide members with online tools and support as well as regular communications.

## Other Benefits

The Trustee has considered other benefits offered by the Plan including its flexible employee contribution structure.

The Trustee's assessment concluded that the charges and transaction costs borne by Plan members represents good value for members relative to the benefits of Plan membership.

## **5. Processing of Core Financial Transactions**

**The Trustee has a specific duty to ensure that core financial transactions are processed promptly and accurately. Core financial transactions include the investment of contributions, transfer of member funds into and out of the Plan, transfers between different investments within the Plan and payments to and in respect of members/beneficiaries.**

The Trustee is required to report to members the processes and controls in place in relation to core financial transactions, which include:

- investing contributions paid into the Plan;
- transferring assets related to members into or out of the Plan;
- switching assets between different investments within the Plan; and
- making payments from the Plan to, or on behalf of, members.

The Trustee has overall responsibility for ensuring transactions are processed promptly and accurately. In practice, the Plan administrator, Standard Life, implements all transactions in accordance with service standards agreed with the Trustee. Standard Life aim to have 90% of all requests completed within 10 working days. Over the Plan year, 92% of requests were completed within the 10 day target.

Over the Plan year, there was one complaint in which a member was displeased about incorrect information they had received. The member was given a turnaround timescale of

20 working days, but Standard Life were not informed that trustee authority was needed before payment of funds could be made. This was a human error. As a result, the complaint was upheld and £100 was paid to the member.

Standard Life provide quarterly reports summarising the service provided to members and the amount of time taken to process various tasks. Any mistakes or delays are investigated thoroughly and corrected as quickly as possible. The Trustee monitors and reviews the administrator's processes and are comfortable that all core financial transactions have been processed promptly and accurately under their remit as administrator. Key processes include:

- A full member and Plan reconciliation being undertaken annually as part of the annual preparation of the Trustee Report & Accounts.
- Provision of quarterly administration reports – enabling the Trustee to check core financial transactions and review processes.
- Monthly contribution checks and daily reconciliation of the Trustee's bank account.
- Checks for all investment and banking transactions prior to processing.
- Straight-through processing for joiners, contributions, leavers and information results. This avoids the need for manual intervention which significantly reduces the risk of error.

The Trustee is satisfied that over the Plan year:

- the administrator was operating appropriate procedures, checks and controls and operating within the agreed Service Level Agreements ('SLAs');
- there have been no material administration errors in relation to processing core financial transactions; and
- all core financial transactions have been processed promptly and accurately.

## **6. Trustee Knowledge and Understanding (TKU)**

**Sections 247 and 248 of the Pensions Act 2004 set out the requirement for trustees to have appropriate knowledge and understanding of the law relating to pensions and trusts, the funding of occupational pension schemes, investment of scheme assets and other matters to enable them to exercise their functions as trustees properly.**

The comments in this section relate to the Plan as a whole and not solely the DC Section.

At the start of the Plan Year there were six Trustee Directors; four Company nominated and two member nominated, thereby fulfilling the legal requirement that at least one-third of a pension scheme's trustee directors should be member nominated. During the Plan Year, one of the existing Company nominated Trustee Directors resigned with effect from 31 December 2023. The appointment of an Independent Professional Trustee as a replacement was completed following the end of the Plan Year.

The Trustee has processes and procedures in place to ensure the Trustee Directors meet the Pension Regulator's Trustee Knowledge and Understanding requirements; some of which are identified below:

- The Trustee met four times during the year at quarterly board meetings. These meetings were supported where appropriate by the Trustee's advisers who have provided specialist advice and updates on legislation, guidance and best practice developments. Trustee meeting minutes were compiled and circulated.

- The Trustee Directors are familiar with the Plan documentation, including the Trust Deed & Rules, Report & Accounts and SIP. In particular, the Trustee Directors refer to the Rules as appropriate when making decisions, reviews and discusses the Plan's Report & Accounts and reviews and updates the SIP as required.
- The Trustee Directors keep their knowledge of the law relating to pensions and trusts up to date through training provided at Trustee meetings and external seminars. Specifically, the Trustee Directors review quarterly updates from their advisers and receive legal training periodically. All training sessions (both external and at meetings) are recorded on their training logs.
- The Trustee Directors are familiar with the investment principles appropriate for DC schemes. The Trustee Directors review quarterly updates from their advisers and receive training and updates on markets and developing investment thinking. Furthermore, specific training is provided so as to ensure the Trustee Directors are able to make informed decisions in respect of the strategies and funds used by the Plan at the appropriate time.
- All of the existing Trustee Directors have completed the Pension Regulator's Trustee Toolkit.

In addition to the skills within the Trustee Board, the Trustee engaged with the appointed professional advisers regularly, throughout the year, to ensure that the Plan is well run and functions are exercised properly. The Trustee Directors reviewed quarterly governance reports from Standard Life (the administration and platform provider) to monitor SLAs and member complaints.

New Trustee Directors are asked to complete the Trustee Toolkit within six months of appointment and the Plan secretary ensures they have access to the key documents. Training is also provided to ensure any newly appointed Trustee Directors are familiar with the Plan, the relevant documentation and their duties.

The Trustee discusses training requirements each year and training logs are reviewed and updated as appropriate.

With support from their advisers, the Trustee identifies areas of training that are appropriate based on the Plan's business plan and developments within the pensions industry. These are addressed with training provided by the Trustee's advisers.

The Trustee Directors believe they have sufficient knowledge and understanding of the law relating to pensions and trusts and the relevant principles relating to the funding and investment of occupational schemes.

The Trustee Directors consider that they meet the Pension Regulator's Trustee Knowledge and Understanding requirements and are confident that their combined knowledge and understanding, together with the support of their advisers, enables them to properly exercise their functions as the Trustee of the Plan.

Signed on behalf of the Trustee of the Avon Rubber Retirement and Death Benefits Plan by the Chair of Trustee

Name Mike Jaffe

Signature \_\_\_\_\_

Date 29 August 2024