Berwin Polymer Processing Group
Broadway, Globe Lane Industrial Estate, Dukinfield, Cheshire SK16 4UR
Telephone: 0161-342 1150 • Fax: 0161-343 1208

Berwin Rubber Company Pension Scheme ("Scheme")

CHAIR'S ANNUAL DC GOVERNANCE STATEMENT

This is the Scheme's annual governance statement under Regulation 23 of the Occupational Pension Schemes (Scheme Administration) Regulations 1996.

As Trustees of the Scheme, we have reviewed and assessed that our systems, processes, and controls across key governance functions are consistent with those set out in The Pensions Regulator's:

- General Code of Practice (28 March 2024) regarding governance and administration of occupational defined contribution schemes
- Regulatory guidance for defined contribution schemes.

Based on our assessment we believe that we have adopted the standards of practice set out in the Code relating to DC schemes and the Trustees are satisfied that the Utmost pension funds are suitable for delivering valuable outcomes for members at retirement.

PROCESSING FINANCIAL TRANSACTIONS DURING THE YEAR:

The processing of each core financial transaction is targeted to be administered over a period of time of 10 working days. The Trustees will review with the administrator the transactions that occur and produce a chart demonstrating the timeliness of these transactions. No new contributions were received during the year and no financial transactions were handled by the Trustees. Where required, financial transactions are processed accurately in accordance with Utmost's internal standards; Utmost is regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

No payments were made directly to the members in the year.

Berwin Polymer Processing Group
Broadway, Globe Lane Industrial Estate, Dukinfield, Cheshire SK16 4UR
Telephone: 0161-342 1150 • Fax: 0161-343 1208

DEFAULT ARRANGEMENT

Default arrangement: investment strategy:

The Trustees have not reviewed the default investment strategy during this scheme year; a review of the default investment strategy was undertaken on the 15th of March 2022 by the trustees. Please see below our written statement on the default investment strategy.

Given the small size of the scheme and the maturity of the membership, the Trustees' aims and objectives in relation to the default investment strategy are to benefit from the economies of scale of the Utmost Life & Pensions investment funds (unit-linked investments) and to adopt the "Investing by Age Strategy", as provided by Utmost Life & Pensions, in any cases where members do not make their own investment choices. The "Investing by Age Strategy" itself contains several different investment choices depending on attitude to risk and projected returns.

The Trustees' policies in this regard are that this strategy reduces risk from moderate to low risk dependant on age, therefore avoiding unnecessary risk for members who are approaching retirement and who wish to draw on their retirement funds.

All investment decisions within this strategy are delegated to Utmost Life and Pensions Limited and ultimately J.P. Morgan Asset Management who are the asset managers for the funds. Further guidance and details on how the strategy works can be found on the Utmost website: https://www.utmost.co.uk

Accordingly, risks will be measured and managed by Utmost and J. P. Morgan Asset Management over time; investments will be spread over a broad range of funds based on member age. As members age, investments are gradually moved into more conservative investments to avoid a sudden loss in pension fund value such as may be experienced on higher risk investment markets.

The Utmost website provides information on risk levels and types of return on the various different types of investment approach:

https://www.utmost.co.uk/investment-funds/fund-information-heritage-equitable-life-joining-utmost-1-january-2020/multi-asset-funds-equitable-life/

Investments can be bought and sold easily at the fund manager level due to the investment expertise and services provided to the funds' assets by J. P. Morgan Asset Management. See also "Level of Transaction Costs and Charges" below.

The Trustees' have principally considered financial matters in relation to the default investment strategy, due to the need protect the value of the pension funds of members nearing expected retirement age. The Trustees have also considered some non-financial matters, for example membership age profile. J.P. Morgan Asset Management is a third party and is not controlled by the Trustees; J.P. Morgan Asset Management may also consider non-financial matters when investing assets in these Utmost funds.

Berwin Polymer Processing Group
Broadway, Globe Lane Industrial Estate, Dukinfield, Cheshire SK16 4UR
Telephone: 0161-342 1150 • Fax: 0161-343 1208

Many members have long term investments in this Scheme and generally good returns. The Trustees believe the above approach will provide the best outcomes for the scheme members. Further, members may leave the default investment fund and select their own Utmost investment fund, if they wish to, depending on their own financial circumstances.

Scheme members have flexibility to review their investment funds from time to time and may choose to change their investment strategy to another portfolio with Utmost Life and Pensions Limited.

Default arrangement: specified performance-based fees

There are no specified performance-based fees incurred in relation to the default arrangement during the Scheme Year.

Default arrangement: asset allocation

In relation to assets in the Scheme's default arrangement, the "Investing by Age" strategy is used. Each member's investment is invested by investment professionals across a range of investments based on member age. Therefore, asset allocations are different member-to-member.

The strategy at each age can be found on the following website:

https://lt.morningstar.com/s5x0s99633/fundquickranklnp/default.aspx?Universe

Examples of funds available as at December 2024:

Utmost Multi-Asset Cautious Pension fund	**Stocks (30%)), Bonds (60%), Cash (10%).**
Utmost Multi-Asset Growth Pension fund	**Stocks (75%), Bonds (25%).**
Utmost Multi-Asset Moderate Pension fund	**Stocks (60%), Bonds (35%), Cash (5%).**

Berwin Polymer Processing Group
Broadway, Globe Lane Industrial Estate, Dukinfield, Cheshire SK16 4UR
Telephone: 0161-342 1150 • Fax: 0161-343 1208

The Scheme's policy on investing in illiquid assets is that the Scheme follows the various investment portfolio options provided by the provider (Utmost) and its investment managers, currently J. P. Morgan. Fund asset allocations can be viewed on the link above and each fund will have a different proportion of illiquid assets. More detail on a member's investment can be provided on enquiry to the Trustees or to Utmost. The Utmost funds are large and therefore it is the Trustee's view that individual requests for benefits payable can always be met immediately as there will be sufficient liquidity across the funds held by Utmost.

Even where members use the default "Investing by Age" strategy, Utmost recommends that members review their investments regularly to ensure the investments remain relevant for the member's circumstances.

LEVEL OF CHARGES AND TRANSACTION COSTS:

Charges and transaction costs can be split into two sections for the year:

1) Those incurred by the principal employer (Berwin Rubber Company Limited) and the Trustees, managing the Scheme. These costs include professional fees and time provided by the Trustees and are all borne by the principal employer and are not passed on to the Scheme members.

2) Those incurred by the provider, Utmost Life and Pensions Limited. The provider manages the funds and has been delegated to make all investment decisions (with its advisers) as highlighted in the investment strategy: The costs vary dependant on the type of unit-linked funds the member holds, however the total costs (including transaction charges) vary from 1.85% to 0.52% of the value of the individual pension fund. Further detail on the costs can again be found on the Utmost website, specifically under the *"Fund Information, Factsheets, Objectives and Charges (heritage Equitable Life)"* section. Members should refer to the following link and then refer to the fund charges section:

https://www.utmost.co.uk/investment-funds/fund-information-heritage-equitable-life-joining-utmost-1-january-2020/fund-information-heritage-equitable-life/.

Further details and analysis on costs and expenses can be found on the Utmost Life and Pensions website under "**Fund information, factsheets, objectives and charges (heritage Equitable Life)**", then under:

"Fund charges, including transaction costs, to 30 June 2024

Illustration of the impact of costs and charges including transaction costs"

Berwin Polymer Processing Group
Broadway, Globe Lane Industrial Estate, Dukinfield, Cheshire SK16 4UR
Telephone: 0161-342 1150 • Fax: 0161-343 1208

The above link and the attached illustration show detailed fund charges and transaction costs, and also provides illustrations of the impact of costs and charges over time.

Members should also refer to their annual pension benefit statement from Utmost: this statement provides members with details of their individual pension fund including changes during the current year. If members have any questions regarding their pension fund they should raise these with the Trustees (contact details below) or directly with Utmost.

VALUE FOR MEMBERS: ASSESSMENT AND RESULTS

The Scheme is a relatively small value scheme with a small number of members. The Trustees believe the Scheme generally represents good value for members – due to the way in which it is managed and the professional investment advice commissioned by the provider, Utmost. Due to the small size of the Scheme and membership the Trustees may consider transferring the Scheme, either into another suitable larger pension scheme (provided there is no loss of value for Scheme members) or alternatively to transfer each pension account into an individual member policy, owned and controlled by the member, not by the Scheme.

We are required by statute to compare the Scheme to three other 'comparison schemes' and compare those schemes with this Scheme in relation to the (i) charges and transaction costs borne by members and (ii) the return on investments using the DWP guidance. The statutory requirements regarding the 'comparison schemes' means that these will be materially different types of scheme, compared to the Scheme. Therefore, the Trustees' view is that it is difficult to draw accurate comparisons. Further, the economies of scale of £100 million + schemes which continue to receive significant annual member and employer contributions, are generally likely to lead to lower member-borne charges and lower transaction costs. Our Scheme is a legacy, closed, company pension scheme (sub-£1 million) with a small number of members.

It should be noted that as the Scheme is not a current open pension scheme being used to comply with the employer's statutory automatic enrolment duties, the statutory rules on the cap on charges that can be charged by pension scheme funds do not apply to the Scheme.

Nevertheless, the Trustees have previously carried out a comparison exercise to the extent possible and based on available data on other pension schemes. This demonstrates that the total % charges and costs for this Scheme (above) are good compared to the comparison schemes listed below.

Berwin Polymer Processing Group
Broadway, Globe Lane Industrial Estate, Dukinfield, Cheshire SK16 4UR
Telephone: 0161-342 1150 • Fax: 0161-343 1208

Comparison Schemes (reviewed in 2022/2023)

COMPARISON SCHEME	FLAT FEE (if applicable)	Management or investment % fees (if applicable)	Transaction costs (e.g. when investments are bought, sold, lent or borrowed)	*Information on investment returns*
NOW PENSIONS	Administration charge of £1.75 pcm	Annual investment charge 0.3% of the member's fund.	Transaction costs are approximately 0.94% per £1000 invested.	*Published example of expected returns on investments:* *-Return on cash 1% pa.* *-Diversified Growth Fund return after charges – 6%pa (transaction costs 0.123% pa).* *-Retirement Countdown Fund after charges -0.68%pa (transaction costs 0.015%pa).*
THE PEOPLES PENSION	Member annual management charge £2.50 pa (on pension pots of £102.50 +).	Annual management charge 0.5% of member's fund (rebated for pots over £3000).	Transaction costs range from 0% to 0.6% of member's pot across the default and other investment funds.	*The 5 year return to March 2022 on the main investment fund was 7.36% (gross of fees).* *The 5 year return to March 2022 on the pre-retirement fund was 2.74% (gross of fees).*
SMART PENSION MASTER TRUST	Flat fee £1.25 pcm	Annual investment management charge of 0.3% of member's fund.	Transaction costs range between: 0.006% – 0.568% of member's pot depending on type of investments.	*Published examples of expected growth on investments per annum are (depending on type of investment fund):* *1%, 1.5%, 2%, 3.5%, 4.3%, 4.5%, 5.8%, 6%, 6.2%* *subject to deduction of costs and transaction charges.*

Berwin Polymer Processing Group
Broadway, Globe Lane Industrial Estate, Dukinfield, Cheshire SK16 4UR
Telephone: 0161-342 1150 • Fax: 0161-343 1208

The trustees' assessment of the extent to which the charges and transaction costs represent good value for members is based on the costs reflecting a below 1% overall annual cost, which is in line if not below the market expectation of asset management services. Furthermore, the investment decisions are managed by a large, experienced asset management company in J.P. Morgan.

Due to the nature of the Scheme and its size the Trustees have not had discussions with one of the above comparison schemes regarding the transfer of Scheme members rights to that other scheme in the event of a wind up of the Scheme. Due to the nature of the Scheme the Trustees are considering the option of transferring members benefits to individual policies held by individual members.

GOVERNANCE AND MANAGEMENT CRITERIA

As the Trustees of a Scheme of this size and due to the age and nature of the Scheme we meet the governance criteria by undertaking basic trustee training online provided by the Pensions Regulator and complying with the annual governance statement requirements and seeking legal advice as necessary should any issues arise in relation to members' benefits. We also liaise regularly with the provider and administrators, Utmost.

We keep our own records but the detailed records and transaction details are kept by Utmost.

We rely on the specialist investment advisers used by Utmost and members are informed of their choice to individually manage their pension investment choices.

The Trustees receive and respond to correspondence received by Utmost and the Trustees deal with any member communications on a case-by-case basis.

The Trustees are aware of the potential for conflicts of interest and conflicts of duty. As there is no legal requirement for the employer to further contribute to the Scheme, the Trustees' view is that there should be no real conflict of interest in relation to those Trustees who also hold company positions with the Scheme employer. Any trustees who are also members of the Scheme are permitted by law to be so and the general legal position is that trustee decision that benefits the trustee (as a Scheme member) is permitted by law.

Berwin Polymer Processing Group
Broadway, Globe Lane Industrial Estate, Dukinfield, Cheshire SK16 4UR
Telephone: 0161-342 1150 • Fax: 0161-343 1208

RETURNS ON INVESTMENTS

We need to provide transparent information on the return on members' pension fund investments (after deduction of any charges and transaction costs), for the default fund and for any selected funds.

Please refer to the links to fund information in this Statement.

Further, detailed information on the various Heritage Equitable Life pension investment funds, including the default "Investment By Age" fund and the member-selected funds, can be viewed at:

https://www.utmost.co.uk/pensions/pension-investment-fund-information/

AND

https://www.utmost.co.uk/investment-funds/fund-information-heritage-equitable-life-joining-utmost-1-january-2020/fund-information-heritage-equitable-life/

We have also considered the returns on investments for the Comparison Schemes in the table above and the Trustees are currently comfortable with the returns on investments provided by this Scheme.

During the scheme year the Trustees have considered the above factors: charges and transaction costs borne by members, the return on investments from the investment portfolios offered by Utmost, and the Trustees' administration and governance of the scheme as described in this Statement.

The Trustees always operate in the best interests of members: the reviews and assessments completed and the Scheme fund investment portfolio and investment options provided, ensure the Scheme is well-positioned to deliver this.

Berwin Polymer Processing Group
Broadway, Globe Lane Industrial Estate, Dukinfield, Cheshire SK16 4UR
Telephone: 0161-342 1150 • Fax: 0161-343 1208

TRUSTEES' KNOWLEDGE AND UNDERSTANDING

The trustees are also directors and senior employees of the business and therefore have a high level of commercial skill and financial expertise however they recognise that they do not have the professional expertise to handle all issues that may arise in relation to the operation of the Scheme. The trustees plan to further improve their knowledge base by using multiple sources, including and not exclusive to information made available by the Pensions Regulator and other external professional partners. Where gaps in their knowledge are identified the trustees already discuss this with the aforementioned parties.

The current trustees will consider whether to appoint an additional or professional trustee to assist with running the Scheme. Any cost of doing this will be borne by the principal employer and not the members. The Trustees have taken legal advice in relation to the preparation of this annual governance statement so as to comply, as far as factually and commercially possible, with their reporting requirements.

If any Scheme members have any questions regarding the matters in this statement, please contact:

Mr Andrew Bramwell (Trustee)
Financial Director
0161 342 1150
email: andrewb@berwin-rubber.co.uk

Certain information from this annual governance statement must be reported to The Pensions Regulator in the annual scheme return.

Signature ...ABramwell........ Print Name ANDREW BRAMWELL

Chair of Trustees

Signed by the Chair of Trustees for and on behalf of the Trustees of the Scheme ....22/01/.. 2025

Disclosure of Fund Costs (including transaction costs in compliance with FCA PS 17/20)

Utmost Life and Pensions Fund	Fund Annual Management Charge	Underlying Open Ended Investment Company "OEIC" Fund Held	Underlying Open Ended Investment Company "OEIC" ISIN Number	Annualised Reporting Period	OEIC Net Transaction Cost PA [1]	Stocklending PA [2]	Utmost Life and Pensions Fund Transaction Cost PA [3]	Utmost Life and Pensions Fund Total Charges Impact PA [4]
Unit-Linked Pension								
Multi-Asset Cautious	0.75%	JPM Multi-Asset Cautious	GB00BJ0LS010	30/09/2024	0.3140%	0.0002%	0.0006%	**1.06%**
Multi-Asset Moderate	0.75%	JPM Multi-Asset Moderate	GB00BJ0LS234	30/09/2024	0.2461%	0.0002%	0.0011%	**1.00%**
Multi-Asset Growth	0.75%	JPM Multi-Asset Growth	GB00BJ0LS457	30/09/2024	0.2232%	0.0003%	0.0000%	**0.97%**
Sterling Corporate Bond	0.75%	JPM Sterling Corporate Bond	GB00BJXFHT23	30/09/2024	0.3032%	0.0008%	0.0000%	**1.05%**
Asia Pacific	0.75%	Abrdn Asia Pacific Equity Enhanced Index JPM Asia Pacific Equity	GB00BRJL7V21 GB00BJ0LBC40	30/09/2024	0.2962%	0.0020%	0.0000%	**1.05%**
European Equity	0.75%	Abrdn European Equity Enhanced Index JPM Europe (Ex UK) Research Enhanced	GB00BRJL7X45 GB00BJ0LBD56	30/09/2024	0.0867%	0.0010%	0.0050%	**0.84%**
US Equity	0.75%	Abrdn American Equity Enhanced Index JPM US Research Enhanced Index	GB00BRJL8192 GB00BJ0LQ964	30/09/2024	0.0713%	0.0003%	0.0010%	**0.82%**
UK Equity	0.75%	Abrdn UK Equity Enhanced Index JPM UK Equity Core	GB00BRJL8531 GB00BJXD1K58	30/09/2024	0.1949%	0.0009%	0.0322%	**0.98%**
UK FTSE All Share Tracker	0.50%	Abrdn UK All Share Tracker Fund JPM UK Equity Index	GB00BDFZ6V38 GB00BJ0LS895	30/09/2024	0.0321%	0.0010%	0.0090%	**0.54%**
International Growth	0.75%	Halifax International Growth	GB00B29M8620	30/09/2024	0.1700%	0.0000%	0.0000%	**0.92%**
UK Government Bond	0.50%	JPM UK Government Bond	GB00BJ0LS671	30/09/2024	0.1765%	0.0000%	0.0021%	**0.68%**
Property [5]	1.00%	Abrdn UK Real Estate	GB00BJZ2TG29	30/09/2024	0.1500%	0.0000%	0.1630%	**1.77%**
Global Equity	0.75%	Abrdn World Equity Enhanced Index JPM Global Research Enhanced Index	GB00BRJL7Z68 GB00BJ0LBG87	30/09/2024	0.1024%	0.0010%	0.0020%	**0.86%**
Money Market	0.50%	JPM GBP Liquidity LVNAV	LU1873130667	30/09/2024	0.0142%	0.0000%	0.0000%	**0.51%**
Managed [6]	0.75%	Composite	See below for assets held	30/09/2024	0.1102%	0.0004%	0.0161%	**0.88%**

Unit-Linked Life

Multi-Asset Cautious	0.75%	JPM Multi-Asset Cautious	GB00BJ0LS010	30/09/2024	0.3140%	0.0002%	0.0006%	**1.06%**
Multi-Asset Moderate	0.75%	JPM Multi-Asset Moderate	GB00BJ0LS234	30/09/2024	0.2461%	0.0002%	0.0011%	**1.00%**
Multi-Asset Growth	0.75%	JPM Multi-Asset Growth	GB00BJ0LS457	30/09/2024	0.2232%	0.0003%	0.0000%	**0.97%**
Sterling Corporate Bond	0.75%	JPM Sterling Corporate Bond	GB00BJXFHT23	30/09/2024	0.3032%	0.0008%	0.0000%	**1.05%**
Asia Pacific	0.75%	Abrdn Asia Pacific Equity Enhanced Index JPM Asia Pacific Equity	GB00BRJL7V21 GB00BJ0LBC40	30/09/2024	0.4425%	0.0021%	0.0000%	**1.19%**
European Equity	0.75%	Abrdn European Equity Enhanced Index JPM Europe (Ex UK) Research Enhanced	GB00BRJL7X45 GB00BJ0LBD56	30/09/2024	0.0229%	0.0010%	0.0340%	**0.81%**
US Equity	0.75%	Abrdn American Equity Enhanced Index JPM US Research Enhanced Index	GB00BRJL8192 GB00BJ0LQ964	30/09/2024	0.0897%	0.0004%	0.0010%	**0.84%**
UK Equity	0.75%	Abrdn UK Equity Enhanced Index JPM UK Equity Core	GB00BRJL8531 GB00BJXD1K58	30/09/2024	0.2212%	0.0007%	0.0462%	**1.02%**
UK FTSE All Share Tracker	0.50%	JPM UK Equity Index	GB00BJ0LS895	30/09/2024	0.0622%	0.0010%	0.0000%	**0.56%**
International Growth	0.75%	Halifax International Growth	GB00B29M8620	30/09/2024	0.1700%	0.0000%	0.0000%	**0.92%**
UK Government Bond	0.50%	JPM UK Government Bond	GB00BJ0LS671	30/09/2024	0.1765%	0.0000%	0.0001%	**0.68%**
Property [5]	1.00%	Abrdn UK Real Estate Feeder	GB00BYPHPB97	30/09/2024	0.0000%	0.0010%	0.1160%	**1.58%**
Global Equity	0.75%	JPM Global Research Enhanced Index	GB00BJ0LBG87	30/09/2024	0.0406%	0.0009%	0.0000%	**0.79%**
Money Market	0.50%	JPM GBP Liquidity LVNAV	LU1873130667	30/09/2024	0.0142%	0.0000%	0.0000%	**0.51%**
Managed [6]	0.75%	Composite	See below for assets held	30/09/2024	0.2245%	0.0002%	0.1061%	**1.08%**

Unit Linked USD

USD Global Bond	0.50%	JPM Global (Ex UK) Bond	GB00BJXD1L65	30/09/2024	0.3055%	0.0001%	0.0000%	**0.81%**
USD Global Equity	0.75%	Abrdn World Equity Enhanced Index JPM Global Research Enhanced Index	GB00BRJL7Z68 GB00BJ0LBG87	30/09/2024	0.0459%	0.0009%	0.0340%	**0.83%**

Notes:

[1] The costs for the underlying OEICs held by each Fund are now being calculated on the full arrival price slippage methodology.

[2] When a Abrdn fund lends stock it is entitled to receive 85% of the income earned. The remaining 15% belongs to the stocklending agent. When a JP Morgan fund lends stock it is entiteld to receive 90% of the income earned. The remaining 10% belongs to the stocklending agent. The costs suffered by the fund are disclosed but not the income in accordance with regulations.

[3] This is the cost incurred on the Fund when it purchases or sells the underlying asset (OEIC) as the price may include a dilution adjustment. The purpose of dilution is to ensure the OEIC performance is not impacted by large investments or disinvestments.

[4] The total charges impact to policyholders on each Utmost Fund of costs at both Fund and underlying OEIC level and includes the annual management charge.

[5] The total fund impact also includes property management expenses of 0.46% per annum as at 30th June 2024.

[6] The calculations for the Managed Funds are based on the relevant calculations for the underlying OEICs held within the portfolio, prorated based on the portfolio percentage held.

Current UK Managed Fund Holdings

Abrdn Asia Pacific Equity Enhanced Index Fund (GB00BRJL7V21)	Scottish Widows UK All Share Tracker Fund (GB0031905119)
Abrdn European Equity Enhanced Index Fund (GB00BRJL7X45)	Abrdn World Equity Enhanced Index Fund (GB00BRJL7Z68)
Abrdn North American Equity Enhanced Index Fund (GB00BRJL8192)	Abrdn Japan Equity Enhanced Index Fund (GB00BRJL8317)
Abrdn UK Equity Enhanced Index Fund (GB00BRJL8531)	Abrdn Liquidity Fund (Lux) - GBP Fund (LU0966092990)
Abrdn Global Emerging Markets Fund (GB0033309757)	Abrdn UK Government Bond Fund (GB0004333380)
JPM Multi-Asset Moderate (GB00BJ0LS234)	

Document Produced: **27 January 2025**