Statement of Investment Principles

SPX UK Pension Scheme

June 2019

Introduction

This document contains the Statement of Investment Principles ('the SIP') required under Section 35 of the Pensions Act 1995, as amended by the Pensions Act 2004 (the "Act"), for the SPX UK Pension Scheme ('the Scheme'). It describes the investment policy being pursued by the Trustee of the Scheme and is in compliance with the Government's voluntary code of conduct for Institutional Investment in the UK ("the Myners Principles"). This SIP also reflects the requirements of Occupational Pension Schemes (Investment) Regulations 2005.

SPX Pension Trust Company Limited ('the Trustee') is responsible for the investment of the Scheme's assets and the administration of the Scheme. Where it is required to make an investment decision, the Trustee always receives advice from the relevant advisers first and it believes that this ensures that it is appropriately familiar with the issues concerned.

Declaration

The Trustee confirms that this SIP reflects the principles governing how decisions about investments are made for the Scheme. The Trustee acknowledges that it is responsible, with guidance from the advisers, for ensuring the assets of the Scheme are invested in accordance with these principles.

Signed .... **Date** 28TH JUNE 2019

For and on behalf of the Trustee of the SPX UK Pension Scheme

Scheme Governance

The Trustee is responsible for the governance and investment of the Scheme's assets. The Trustee considers that the governance structure set out in this SIP is appropriate for the Scheme as it allows the Trustee to make the important decisions on investment policy, while delegating the day-to-day aspects to the Investment Managers or its advisers as appropriate.

Investment Objectives

- The principal objective of the Trustee is to invest the assets of the Scheme to meet its liabilities when they fall due.

- The investment strategy of the Scheme is managed and monitored using a Pensions Risk Management Framework (PRMF) which outlines the funding objectives and risk constraints set by the Trustee. The PRMF is reviewed and monitored by the Trustee on at least a quarterly basis including the expected return on assets as provided by the Investment Consultant.

- The Trustee's primary funding objective for the Scheme is to reach full funding using a liability discount rate of Gilts Flat as soon as is practical within a set risk budget.

- In setting the investment strategy, the Trustee aims to:

    - Target an expected return on assets close to the return required to meet the funding objective.

    - Manage the investment risk including that arising due to mismatch between assets and liabilities and limit the total risk on the Scheme below the risk budget set in the PRMF

    - Maintain suitable liquidity of assets such that the Scheme is not forced to buy and sell investments at particular times to pay member benefits or meet potential collateral calls

Investment Managers

- The Trustee delegates the day-to-day management of the assets to the appropriate Investment Managers.

- Investment Managers are carefully selected by the Trustee to manage each of the underlying mandates following guidance and written advice from its Investment Consultant.

- The Scheme pays an annual fee to each manager which along with the mandate's performance targets, benchmarks and restrictions are set out in the respective Investment Management Agreements or pooled fund documentation where applicable.

- The Trustee assesses the investment managers' performance regularly against a benchmark appropriate to each manager, taking into account the level of risk taken by each manager. To assist the Trustee in assessing performance the Investment Consultant will provide relevant reporting on a quarterly basis. As part of this process, the Trustee has delegated the detailed monitoring of the Scheme's Investment Managers to its Investment Consultant.

- From time to time Investment Managers and/or mandates are changed and this is done after due consideration and the receipt of appropriate advice from an Investment Consultant.

Investment Strategy

Having considered advice from its advisers, and also having due regard for the objectives, the liabilities of the Scheme, the risks of and to the Scheme and the covenant of Radiodetection Limited ('Sponsor'), the Trustee has adopted an appropriate investment strategy. The investment strategy is driven by the objectives and constraints from the PRMF, which helps balance the risks and returns required to reach the Scheme's funding objectives.

This investment strategy is designed to ensure two criteria are met:

- **Diversification**

  The choice of investments is designed to ensure that the Scheme's investments are adequately diversified given the Scheme's circumstances. The Trustee will monitor the strategy regularly to ensure that they are comfortable with the level of diversification.

- **Suitability**

  The Trustee has taken advice from the advisers to ensure that the asset allocation strategy is suitable for the Scheme, given its liability profile, any legal requirements, regulatory guidance and specifications in the Trust Deed & Rules.

Monitoring

Investment Managers

The Trustee will monitor the performance of the Investment Managers against the agreed performance objectives.

The Trustee, or the advisers on behalf of the Trustee, will regularly review the activities of the Investment Managers to satisfy itself that each Investment Manager continues to carry out their work competently and has the appropriate knowledge and experience to manage the assets of the Scheme.

As part of this review, the Trustee will consider whether or not each Investment Manager:

- Is carrying out its function competently.
- Has regard to the need for diversification of investments.
- Has regard to the suitability of each investment and each category of investment.
- Has been exercising its powers of investment with a view to giving effect to the principles contained in this SIP, so far as is reasonably practical.

If the Trustee is not satisfied with an Investment Manager, they will ask the Investment Manager to take steps to rectify the situation. If the Investment Manager still does not meet the Trustee's requirements, it will remove the Investment Manager and appoint another.

SIP

The Trustee aims to review this SIP annually, or, without delay, following any changes to the investment strategy, and modify it with consultation from their advisers and the Sponsor if deemed appropriate. There will be no obligation to change this SIP as part of such a review.

Risks

The Trustee recognises there are a number of risks involved in investing the assets of the Scheme. These include (but are not limited to) deficit risk, manager risk, liquidity risk, currency risk, interest rate and inflation risk, political risk, sponsor risk and counterparty risk. The Trustee monitors and manages these risks through measures specific to each risk.

The Trustee will keep these risks and how they are measured and managed under regular review.

Responsible Investment

Environmental, Social and Governance

The Trustee believes the Scheme is a long-term investor and seeks to achieve sustainable returns at an appropriate level of risk over its lifetime. The Trustee believes that Environmental, Social and Governance ("ESG") risks are financially material risks and should be considered as part of the investment strategy and implementation decisions.

The Trustee believes that the most important methods of managing these risks are integration and engagement (defined below). However, the relevance and impact of integration and engagement will vary between different asset classes.

Integration: integrating the analysis of ESG risks into the active investment decision-making processes. The Trustee believes ESG risks are no less important than any other risks to the Scheme's investments and any active asset manager's process should fully incorporate these risks when assessing the attractiveness of investment opportunities.

Engagement: the Scheme's investment managers are encouraged where possible, to engage directly on ESG risks with the entities they are investing in (whether debt or equity).

When investing in new asset classes, the Trustee assesses, with advice from their advisers, the relevance of ESG-related risks and the most appropriate way to ensure that they are incorporated into the mandate. These views will then affect:

- Whether the asset class is appropriate for the Scheme given the ESG risks it is exposed to and the methods available for managing these risks;

- Where relevant, the selection of a preferred asset manager with a clear commitment to responsible investing, i.e. a manager that has an appropriate approach to integration and engagement for the given asset class.

On an ongoing basis, the Trustee's investment consultant monitors each asset manager's approach to ESG and regularly reports on this to the Trustee.

Stewardship

Direct engagement with underlying companies (as well as other relevant persons) of which the Trustee owns shares and debt is carried out by the Scheme's investment managers. The Trustee's investment advisers assess the ability of each investment manager in engaging with underlying companies to promote the long-term success of the investments. When selecting, monitoring and de-selecting asset managers, engagement is factored into the decision-making process to the appropriate level for the specific asset class in question.

The Trustee's policy on the exercise of rights attaching to investments, including voting rights, is that these rights should be exercised by the Investment Managers on behalf of the Trustee having regard to the best financial interests of the beneficiaries. The Trustee has been made aware of each Investment Manager's corporate governance policy where appropriate and has delegated the exercise of such rights to the Investment Managers.

The Responsible Investment policy will be reviewed on an regular basis as part of the Scheme's SIP review.

Other Issues

Statutory Funding Objective

The Trustee will obtain and consider proper advice on the question of whether the investments are satisfactory having regard to both the investment objectives and the requirement to meet statutory funding requirements.

The funding position is reviewed periodically by the Scheme Actuary, with a full actuarial valuation at least every three years.

The Trustee will consider with their advisers, whether the results of these actuarial valuations suggest that any change to investment strategy is necessary to ensure continued compliance with the statutory funding objective.

Defined Contribution (DC) Section and Additional Voluntary Contributions (AVCs)

Under the Scheme's Trust Deed and Rules, members are allowed to invest AVCs to improve the benefits they receive at retirement. The Scheme also has a DC Section that aims to provide access to appropriate funds to allow the members the opportunity to generate investment returns. Where members do not wish to make a decision regarding their investments, an appropriate default is provided. The DB section AVC assets and DC section assets are managed through the Aegon DC platform. In addition to the default lifestyle strategy designed by the Trustee for the DB AVC and DC sections, members can self-select investments from a wide range of funds offered by Aegon. The fund range covers an extensive list of asset classes from active multi-asset funds to passive index tracker funds.

There are also AVCs held with Prudential in a With Profits fund. When the decision was made to change the DB AVC assets, it was decided that members in these funds would be given the option of transferring to the Aegon DC platform, rather than enforcing a move, due to possible costs and guarantees associated with their type of investments.

The Trustee reviews these arrangements regularly having regard to their performance, the objectives and the views of their advisers.