

Annual statement regarding governance of the DC Section of the Nestlé UK Pension Fund (the “Fund”)

The Occupational Pension Schemes (Scheme Administration) Regulations 1996 (“the Administration Regulations”) require the Trustee of the Nestlé UK Pension Fund (“the Trustee”) to prepare an annual statement regarding governance and include this in the annual Trustee 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.

This statement issued by the Trustee covers the period from 1 January 2025 to 31 December 2025 (“the Fund Year”) 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 Fund’s investment strategy, including the Default Option
2. Net investment returns
 - i. Default Option
 - ii. Self-select funds
 - iii. Legacy Additional Voluntary Contributions
3. Member borne charges and transaction costs
 - i. Default Option
 - ii. Self-select funds
 - iii. Legacy Additional Voluntary Contributions
 - iv. 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 Fund’s investment strategy, including the Default Option

The Trustee is required to design a 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 Fund's membership.

The Fund is used as a qualifying scheme for auto-enrolment purposes. Qualifying schemes are required to have a default investment option in place for members who do not make an active investment choice.

The Default Option

The Trustee is responsible for the Fund's investment governance, which includes setting and monitoring the investment strategy for the Fund's Default Option, the Lifetime Pathway. The Lifetime Pathway is primarily provided for members who join the Fund and do not choose an investment option for their contributions.

The Lifetime Pathway initially invests more in assets with higher growth potential (and therefore, higher expected levels of volatility), such as equities. As members get closer to their target retirement age, it then gradually shifts into a more diversified range of assets with the aim of

reducing the overall level of fluctuations in members' fund values. In the final years prior to a member's target retirement age, it gradually shifts into a 100% cash investment.

The Lifetime Pathway is composed of three phases as follows:

- Growth Phase (15+ years from target retirement age) – where members invest in assets which are expected, over the long-term, to deliver strong returns relative to inflation.
- Consolidation Phase (5 – 15 years from target retirement age) – members' investments are gradually transitioned into a diversified mix of assets in order to deliver good returns over the long-term relative to inflation, while seeking to reduce the level of fluctuations in members' fund values (compared to the Growth Phase).
- Pre-Retirement Phase (last 5 years before target retirement age) – members' assets are increasingly invested in cash which is expected to help mitigate fluctuations in the sizes of members' fund values whilst also aligning with the way most members are expected to take their benefits in the near-term.

Statement of Investment Principles

Details of the objectives and the Trustee's policies regarding the Default Option can be found in a document called the 'DC section Statement of Investment Principles' ("SIP"). The Fund's SIP, updated in February 2026, is attached to this statement and can also be found [here](#).

The Trustee's overall aim for the Default Option is to invest contributions in the best interests of members. The main objective of the Default Option is to provide good member outcomes at retirement while subject to a level of investment risk which is appropriate for the majority of members who have not made their own investment choice.

The Trustee believes that it is in the best interests of the majority of members to offer a Default Option which:

- Manages the principal investment risks members face during their membership of the Fund;
- Maximises investment returns relative to inflation while taking an appropriate level of risk during membership of the Fund for the majority of members who do not make investment choices; and
- Reflects members' likely benefit choices at retirement.

Investment strategy review

Although the Trustee, via its Defined Contribution Committee ("DCC"), did not undertake a full review of the Fund's investment strategy during the Fund Year, changes linked to the previous review were implemented. The last review of the Fund's investments, which included formally reviewing the Default Option, the Lifetime Pathway, was completed on 14 November 2023 and considered the aims and objectives of the Default Option as stated in the SIP.

As part of the 2023 review, the DCC decided to retain the cash target at retirement of the Lifetime Pathway but also to make some changes to the glidepath and the component funds (Growth, Equities, Blended Assets and Pre-retirement to Cash). Due to making these changes while also undertaking a major project relating to administration, the changes were implemented in phases, the first – and most significant – of which was completed in January 2024. Further changes were made over the Fund Year to the Growth fund and glidepath design of Lifetime Pathway in June and July 2025, as detailed below:

- **Growth:** The Growth fund is used within the Growth Phase of the Lifetime Pathway and historically replicated a 70/30 combination of the Equities and Blended Assets funds. As part of the 2023 strategy review, the DCC decided that the Growth fund should fully mirror the Equities fund in order to increase the growth potential of members' savings whilst they are still many years away from retirement. Due to administrative restrictions, an interim solution remained in place until this change was successfully implemented across two tranches in June and July 2025.

- **Design of Lifetime Pathway:** As part of the restructuring of the Growth Fund, the Lifetime Pathway was altered to smooth members' transition through the glidepath and avoid a sudden change in asset allocation when members reach 15 years from their target retirement age. This change was made to steadily reduce market risk over a period of years as members move from the Growth Phase to the Consolidation Phase

The changes outlined above are expected to improve retirement outcomes for members by increasing expected returns as well as managing investment risk (including environmental, social and governance ("ESG") risks). The changes agreed are believed to be in line with the objectives of the Default Option as well as the Trustee's wider investment beliefs. This includes the Trustee's responsible investment beliefs and net zero ambition, as described further in the SIP.

In advance of making the investment changes outlined above, expected transition costs were reviewed, and it was concluded that the costs were reasonable. The Trustee also reviewed actual transition costs incurred and again believed these to be reasonable. Further risk reduction measures around the transition included monitoring investment markets, making a final go/no-go decision prior to the transition and putting protections in place (e.g. pre-funding) to limit out of market exposure for members.

The Trustee undertakes a formal review of the Default Option every three years. The next investment strategy review formally commenced on 20 May 2026. Further details on the outcome of this review will be provided in next year's statement.

Performance Monitoring

The performance of the Default Option and the component funds used within it is regularly monitored (on at least a quarterly basis) between each formal investment strategy review to ensure they are functioning as expected and in line with the objectives outlined in the SIP.

There are performance monitoring metrics in place to bring any underperforming funds to the attention of the Trustee. Performance of the funds is reviewed against benchmarks and, where relevant, targets, that have been agreed with the investment managers. The Trustee also reviews (on at least a quarterly basis) the volatility and investment returns experienced by members invested in the Default Option against agreed thresholds and targets.

Over the year, the Trustee reviewed the performance of the Default Option against the agreed thresholds and targets (which include set benchmarks, broad market comparators and inflation levels). The reviews concluded that the Default Option was performing broadly as expected, and that the changes made over the year had benefitted members, in line with the overall objective outlined in the SIP to support members in achieving a good retirement outcome.

More detail on these targets can be found in the DC Investment Implementation Document ("IID") found [here](#).

Default Option asset allocation

The Trustee is required to disclose the asset allocations of investments used in the Default Option across specified asset classes in accordance with statutory guidance. The table below shows the percentage of assets allocated across the specified asset classes for a member invested in the Lifetime Pathway at different ages as at 31 December 2025.

The specified asset classes are shown in the table below.

Asset class	Year end asset allocation as at 31 December 2025 (%)			
	25 years old	45 years old	55 years old	66 years old (Normal Retirement Age*)
Cash	0.2	0.2	1.3	100.0
Bonds	0.0	0.0	28.0	0.0
<i>Corporate bonds</i>	0.0	0.0	22.4	0.0
<i>Fixed interest government bonds</i>	0.0	0.0	3.8	0.0
<i>Index-linked government bonds</i>	0.0	0.0	0.0	0.0
<i>Other bonds</i>	0.0	0.0	1.8	0.0
Listed equities	99.8	99.8	58.3	0.0
<i>UK equities</i>	3.2	3.2	1.9	0.0
<i>Developed market equities (excluding UK)</i>	87.1	87.1	51.1	0.0
<i>Emerging markets</i>	9.5	9.5	5.3	0.0
Private equity	0.0	0.0	0.0	0.0
<i>Venture capital</i>	0.0	0.0	0.0	0.0
<i>Growth equity</i>	0.0	0.0	0.0	0.0
Infrastructure	0.0	0.0	0.0	0.0
Property	0.0	0.0	5.2	0.0
Private debt	0.0	0.0	0.0	0.0
Other¹	0.0	0.0	7.2	0.0

Source: Underlying managers at 31 December 2025. *Normal Retirement Age within the Fund aligns with State Pension Age which is different depending on each member's current age. State Pension Age for those retiring on 31 December 2025 is age 66.

1. Includes derivatives.

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 scheme members were invested in during the scheme year. Net investment return refers to the investment returns on funds minus all member-borne transaction costs and charges.

The net investment returns have been prepared having regard to statutory guidance and cover the period to 31 December 2025.

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

(i) Default Option

Lifetime Pathway Performance to 31 December 2025	Annualised net returns (% p.a.)	
Age of member at start of investment reporting period	1 year	5 years
25	14.3	9.8
45	14.3	9.8
55	11.4	5.0

Source: Underlying managers and Fidelity as at 31 December 2025.

(ii) Self-select investment funds

In addition to the Lifetime Pathway, members also have the option to invest in 10 self-select funds.

Performance to 31 December 2025	Annualised net returns (% p.a.)	
Fund name	1 year	5 years
Equities	13.4	11.7
Blended Assets	10.6	4.2
Pre-retirement to Cash	4.3	3.0
Ethical Growth	15.5	9.1
Ethical Consolidation	6.5	0.4
Pre-retirement to Annuity	5.4	-6.0
Cash	4.3	3.0
Corporate Bond	7.1	-0.4
Property	5.3	4.8
Shariah Fund*	12.4	13.5

Source: Fidelity as at 31 December 2025. *Shariah Fund (equities) has been made available to members since February 2023. As such, the 5-year performance for this Fund has been provided by the Fund manager and is included for information only.

(iii) Legacy Additional Voluntary Contributions (“AVCs”)

A small amount of legacy AVC assets remain within the Standard Life AVC policy held within the Fund. These arrangements are closed to new contributions and were only available to members of the Defined Benefit (DB) Section of the Fund.

Performance to 31 December 2025	Annualised net returns (% p.a.)	
Fund name	1 year	5 years
Standard Life With Profits One	15.1	8.3
Standard Life With Profits One 2006	15.1	8.3

Source: Standard Life as at 31 December 2025

The Standard Life With Profits Funds have unique features including an element of smoothing of returns. The underlying returns generated by the asset allocation shown above are not applied to member accounts but instead members receive an annual bonus rate which is applied throughout the year. This feature can be beneficial during periods of market stress where bonus rates are often above the underlying returns. However, during a market rally, bonus rates often fall below the underlying returns. This feature helps to provide more consistent returns regardless of the volatility of the underlying assets in the With Profits Funds. There are no guarantees associated with either of the Standard Life With Profits Funds, however once the annual bonus rate is announced, it cannot be removed. Terminal bonuses, which are subject to change at any time, can also be payable as part of the With Profits Funds.

The annual bonus rates announced (and that cannot be removed) for each of the With Profits Funds are set out below. Bonus rates are applied on 1 February each year. The previous five years of bonus rates have been annualised to make comparison against underlying asset returns shown above easier.

With Profits Funds Bonus Rates	Bonus Rates Announced (% p.a.)	
Fund name	1 year	5 years
Standard Life With Profits One	2.8	1.7
Standard Life With Profits One 2006	2.8	1.7

Source: Standard Life as at 31 December 2025

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 Fund'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 introduced by the Occupational Pension Schemes (Administration and Disclosure) (Amendment) Regulations 2018.

The Trustee has set out the costs and charges that are borne by members, rather than the employer, over the Fund Year in respect of each investment fund available to members. These comprise the Total Expense Ratio and, insofar as we were able to, transaction costs.

The charges have been supplied by Fidelity and Standard Life. The Trustee can confirm that there is no missing transaction costs data and all transaction costs covering the year to 31 December 2025, have been obtained. Where the transaction costs provided were negative, these have been shown in this statement as zero in line with FCA guidance. The Trustee has had regard to the relevant statutory guidance on performance-based fees and charge cap, and confirms there were no performance fees across the funds.

(i) Default Option – the Lifetime Pathway

The Lifetime Pathway is a lifestyle arrangement which means that members' assets are automatically moved between different investment funds as they approach their target retirement date.

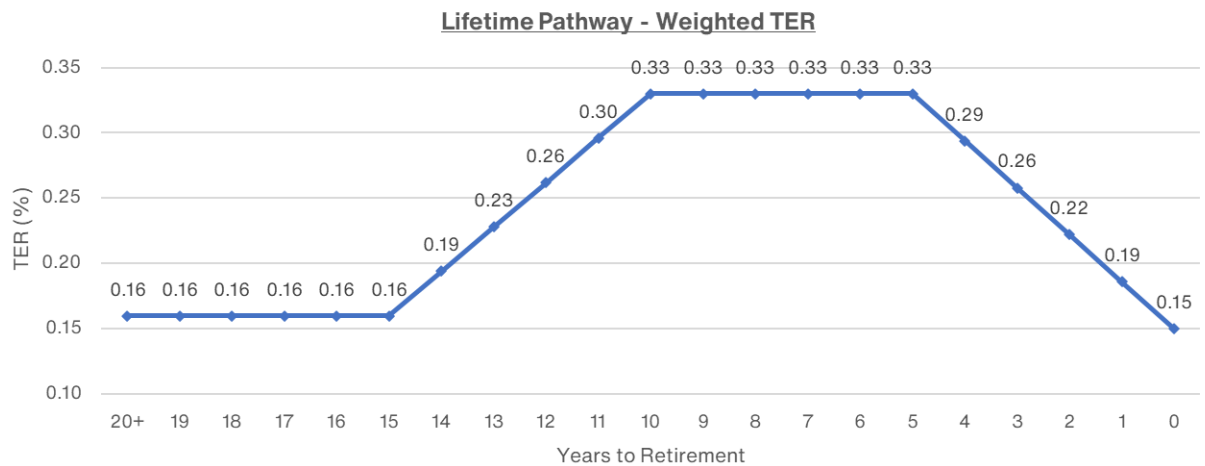
The TER paid by members for investing in the Lifetime Pathway over the year depends on their term to retirement, as shown in the line chart below. In the Fund Year, the TER ranged from 0.15% p.a. to 0.33% p.a., which is below the 0.75% p.a. charge cap for schemes that are used for auto-enrolment purposes.

Transaction costs ranged between 0.01% p.a. and 0.09% p.a., with the total cost associated with the Lifetime Pathway between 0.16% p.a. and 0.42% p.a.

Default Option	TER (% p.a.)	Transaction costs (% p.a.)	Total costs (% p.a.)
Lifetime Pathway	0.15-0.33	0.01-0.09	0.16-0.42

Source: Fidelity. TERs and transaction costs as at 31 December 2025.

Chart 2: Lifetime Pathway TER



(ii) Self-select investment funds

In addition to the Lifetime Pathway members also have the option to invest in ten individual funds. The TERs and transaction costs for each of these are shown in the following tables:

Self-Select Funds	TER (% p.a.)	Transaction costs (% p.a.)	Total costs (% p.a.)
Equities	0.16	0.09	0.25
Blended Assets	0.33	0.09	0.42
Pre-retirement to Cash	0.15	0.01	0.16
Ethical Growth	0.25	0.11	0.36
Ethical Consolidation	0.12	0.09	0.21
Pre-retirement to Annuity	0.14	0.02	0.16
Cash	0.15	0.01	0.16
Corporate Bond	0.32	0.00	0.32
Property	0.53	0.12	0.65
Shariah	0.20	0.01	0.21

Source: Fidelity as at 31 December 2025.

(iii) Legacy Additional Voluntary Contributions

The legacy AVC assets remaining within the Standard Life Policy held within the Fund are closed to new contributions. These arrangements were only available to members of the DB Section of the Fund.

The TERs and transaction costs associated with the Standard Life AVC policy are shown below.

Legacy AVC Funds	TER (% p.a.)	Transaction costs (% p.a.)	Total costs (% p.a.)
Standard Life With Profits One	1.00	0.03	1.03
Standard Life With Profits One 2006	1.00	0.03	1.03

Source: Standard Life as at 31 December 2025.

(iv) Illustrations 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 or managers of a relevant Fund. These changes are intended to improve transparency on costs.

In order to help members understand the impact that costs and charges can have on their retirement savings, the Trustee has provided three illustrations of their cumulative effect on the value of typical Fund members' savings over the period to their retirement.

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

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 typical members of the Fund, they are not a substitute for the individual, personalised illustrations which are provided to members in their annual benefit statements.

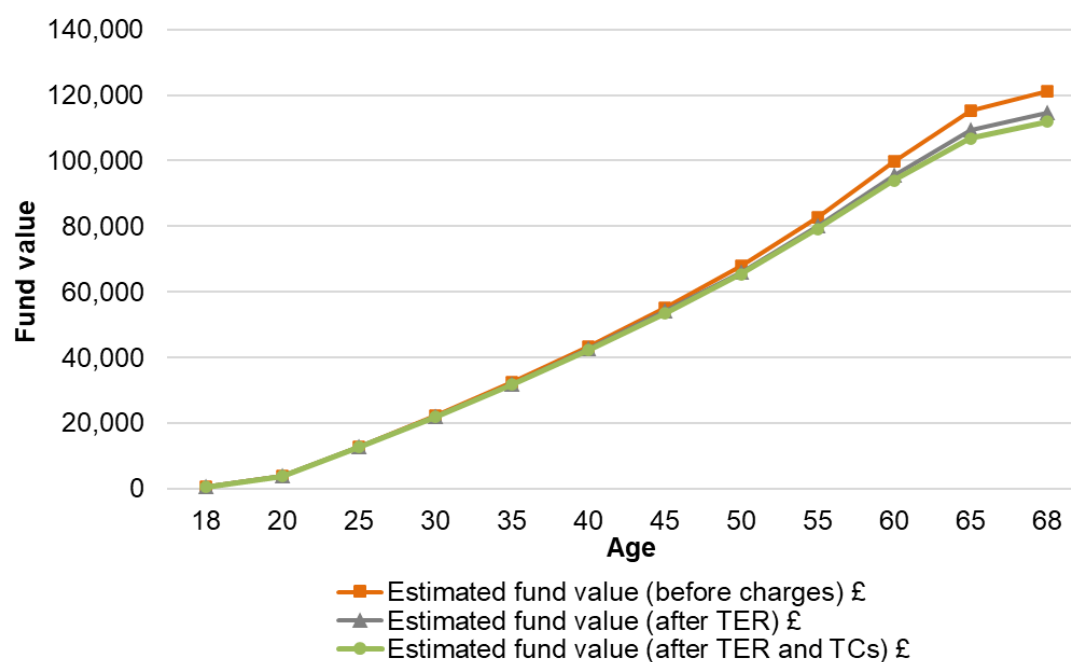
Each illustration, A, B and C is shown for a different type of member invested in the Lifetime Pathway, which is the Default Option. Illustrations for the Default Option are shown as a chart and a table as follows:

- Each chart represents investment in the Default Option, the Lifetime Pathway.
 - The charts show a projection of the member's retirement savings at retirement age, with and without costs and charges applied.
- As the projected retirement savings are dependent on investment returns as well as the level of costs and charges, we have also included some comparison figures with other investments in the tables.
 - For comparison purposes, we also show the projected retirement savings if the typical member were invested in the fund within the self-select range offered by the Fund which attracts the lowest charges, the Pre-retirement to Annuity Fund and the self-select fund which attracts the highest charges, the Property Fund.

All projected fund values are shown in today's terms, and do not need to be reduced further for the effect of future expected inflation.

Illustration A: is based on a Fund member who has 50 years to go until their retirement at age 68. The member has a current salary of £18,500 with future contributions of 9% of salary. The member has a starting fund value of £600.

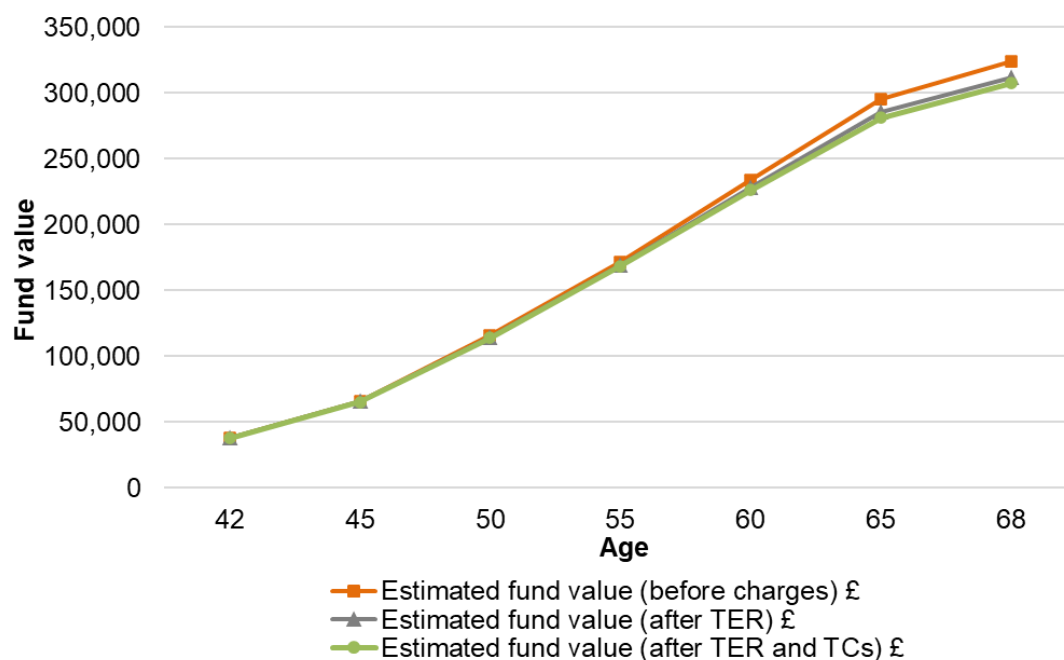
Chart 3: Youngest Active Member - Lifetime Pathway



Projected Pension Account in today's money									
Age	Lifetime Pathway (Default Option)			Pre-retirement to Annuity Fund (Lowest charging fund)			Property Fund (Highest charging fund)		
	Before charges	After charges	Effect of charges	Before charges	After charges	Effect of charges	Before charges	After charges	Effect of charges
	£	£	£	£	£	£	£	£	£
18	600	600	0	600	600	0	600	600	0
20	3,960	3,940	20	4,044	4,037	7	4,040	4,010	30
25	12,780	12,680	100	13,740	13,660	80	13,740	13,390	350
30	22,270	21,960	310	25,200	24,970	230	25,200	24,110	1,090
35	32,480	31,830	650	38,760	38,240	520	38,760	36,380	2,380
40	43,460	42,330	1,130	54,800	53,830	970	54,800	50,410	4,390
45	55,260	53,500	1,760	73,770	72,140	1,630	73,770	66,450	7,320
50	67,950	65,370	2,580	96,200	93,650	2,550	96,200	84,800	11,400
55	82,840	79,170	3,670	122,740	118,910	3,830	122,740	105,780	16,960
60	99,730	93,930	5,800	154,130	148,570	5,560	154,130	129,780	24,350
65	115,330	106,860	8,470	191,260	183,410	7,850	191,260	157,230	34,030
68	121,290	111,800	9,490	216,720	207,170	9,550	216,720	175,560	41,160

Illustration B: is based on a Fund member who has 26 years to go until their retirement at age 68. The member has a current salary of £50,000 with future contributions of 17.5% of salary. The member has a starting fund value of £37,500.

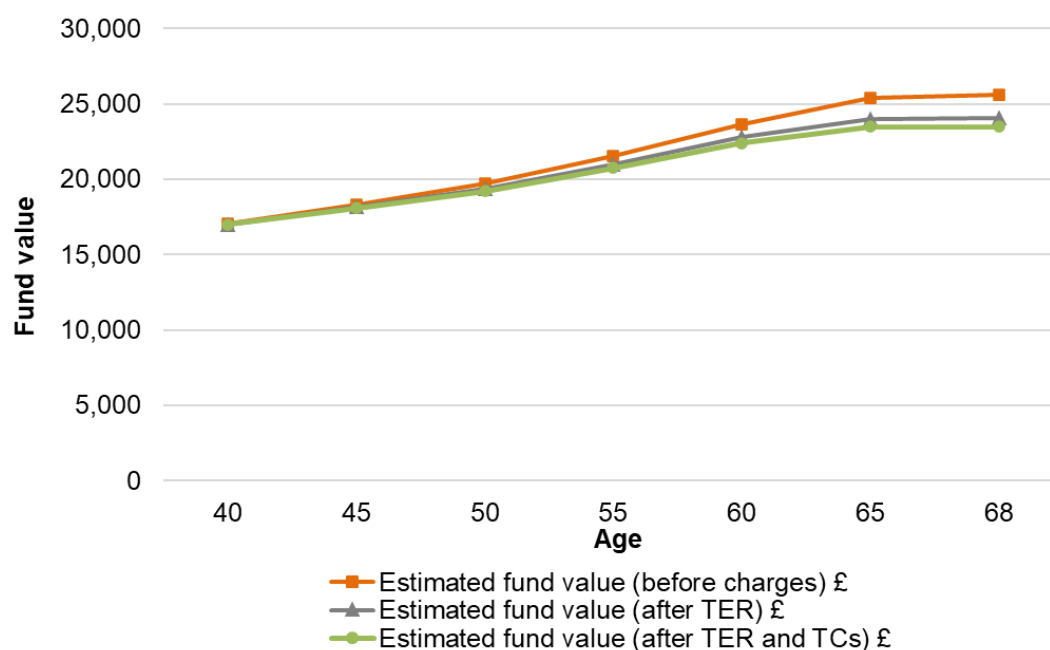
Chart 4: Typical Active Member - Lifetime Pathway



Projected Pension Account in today's money									
Age	Lifetime Pathway (Default Option)			Pre-retirement to Annuity Fund (Lowest charging fund)			Property Fund (Highest charging fund)		
	Before charges	After charges	Effect of charges	Before charges	After charges	Effect of charges	Before charges	After charges	Effect of charges
	£	£	£	£	£	£	£	£	£
42	37,500	37,500	0	37,500	37,500	0	37,500	37,500	0
45	65,670	65,320	350	68,750	68,520	230	68,750	67,650	1,100
50	115,440	114,030	1,410	128,370	127,350	1,020	128,370	123,610	4,760
55	171,490	168,280	3,210	198,880	196,450	2,430	198,880	187,620	11,260
60	233,770	226,220	7,550	282,290	277,590	4,700	282,290	260,830	21,460
65	295,080	281,280	13,800	380,940	372,900	8,040	380,940	344,560	36,380
68	323,650	307,230	16,420	448,590	437,890	10,700	448,590	400,460	48,130

Illustration C: is based on a deferred member (a member who is no longer making contributions) who has 29 years to go until their retirement at age 68. The member has a starting fund value of £16,800.

Chart 5: Typical Deferred Member - Lifetime Pathway



Projected Pension Account in today's money									
Age	Lifetime Pathway (Default Option)			Pre-retirement to Annuity Fund (Lowest charging fund)			Property Fund (Highest charging fund)		
	Before charges	After charges	Effect of charges	Before charges	After charges	Effect of charges	Before charges	After charges	Effect of charges
	£	£	£	£	£	£	£	£	£
39	16,800	16,800	0	16,800	16,800	0	16,800	16,800	0
40	17,050	17,010	40	17,370	17,350	20	17,370	17,260	110
45	18,330	18,090	240	20,550	20,380	170	20,550	19,740	810
50	19,710	19,230	480	24,310	23,930	380	24,310	22,570	1,740
55	21,520	20,760	760	28,750	28,100	650	28,750	25,820	2,930
60	23,680	22,410	1,270	34,000	33,010	990	34,000	29,530	4,470
65	25,370	23,490	1,880	40,220	38,770	1,450	40,220	33,770	6,450
68	25,590	23,490	2,100	44,480	42,690	1,790	44,480	36,600	7,880

Members are advised to consider both the level of costs and charges and the expected return on investments (i.e., the risk profile of the strategy) in making investment decisions.

Assumptions and data for illustrations:

The following assumptions have been made for the purposes of the above illustrations:

- *Annual salary growth and inflation is assumed to be 2.5% per annum.*
- *The starting fund values and future contributions used in the projections is representative of the average for the Fund.*
- *The projected annual returns on assets (gross of fees) are:*
 - *Equities* 6.0% p.a.
 - *Blended Assets* 4.0% p.a.
 - *Growth* 4.0% p.a.
 - *Pre-retirement to Cash* 2.0% p.a.
 - *Pre-retirement to Annuity* 6.0% p.a.
 - *Property* 6.0% p.a.

These returns align with the expected returns used within the Statutory Money Purchase Illustrations for the 2025 benefit statements.

- *For the Lifetime Pathway the projection takes into account the changing proportion invested in the different underlying funds. Growth, Equities, Blended Assets and Pre-retirement to Cash are underlying funds of Lifetime Pathway.*
- *The transaction costs have been averaged over a 5 year period in line with statutory guidance to reduce the level of volatility, and a floor of 0% per annum 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.*
- *Member data used is as at 31 December 2025.*

4. Value for Members assessment

The Administration Regulations require the Trustee to make an assessment of charges and transaction costs borne by members and the extent to which those charges and costs represent good value for money for members.

There is no legal definition of "good value" or the process of determining this for Fund members. Therefore, working in conjunction with our investment consultant, the Trustee has developed a cost-benefit analysis framework in order to make an assessment as to whether our members receive good value from the Fund relative to the costs and charges they pay, in accordance with statutory guidance.

The costs have been identified as TER, Transaction Costs and are set out in Section 3 of this statement. The charges for the DC Section investment options are lower than those used for similar schemes when benchmarked against market data.

The Trustee has considered the benefits of membership under the following five categories: governance, investments, administration, member communications and retirement support. 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 suitable governance monitoring in place and regularly reviews and updates its governance processes and procedures to make sure these align with industry best practice.
- Core financial transactions and other key governance metrics are monitored quarterly, and DC related risks are captured in, and monitored through the Trustee's risk register. Investment performance of the DC Section funds is reported on and reviewed quarterly and the legacy AVC funds are reviewed periodically.
- The Trustee board has delegated specific duties to several sub-committees:
 - The DCC, which meets at least quarterly and focuses its time on DC matters;
 - The Governance and Compliance Committee ("GCC"), which meets at least quarterly to discuss administration and governance aspects, including DC which is a standing item; and
 - Various working groups that are set up as and when required to progress specific projects.

Any key discussion and decision making that takes place at a sub-committee is reported back at the main Trustee Board meeting.

- The Nestlé Pensions Investment Team also attends meetings to support the Trustee with any decision-making, alongside Trustee advisers.

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 large contribution to the delivery of good member outcomes.

- The Fund offers a lifestyle arrangement – the Lifetime Pathway – as the Default Option, which targets taking retirement savings as cash upon reaching retirement. The Trustee believes this is in line with how the majority of members will look to take their DC Section savings in the near-term.
- A range of self-select funds is also available to members as an alternative to the lifestyle arrangement. The Trustee regularly reviews the self-select range to ensure it remains suitable for meeting the likely different risk and return objectives that members may have.
- The investment options available, including the Lifetime Pathway and the self-select funds, have been designed following advice from the Trustee's investment consultant and with the specific needs of the Fund's members in mind.
- The DCC reviews the performance of the Lifetime Pathway and self-select funds against their respective aims and objectives on a quarterly basis, based on reports received from their investment consultant and the Nestlé Investment Team. This review includes analysis of fund performance against benchmarks and/or targets agreed with the investment manager, as well as bespoke thresholds and targets set by the DCC.
- An in-depth review of the investment options is undertaken at least every three years to make sure they remain suitable for the Fund's members.
- The DCC also receive more frequent reporting during times of market stress and volatility, for example, following the US President's announcement of global tariffs and more recently, the ongoing conflict in the Middle East.

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.

- As the Fund is administered in-house by Nestlé Pensions, the administration service is focused on the needs of scheme members, and the resourcing requirements needed to deliver the administration service are therefore transparent and can be regularly assessed.
- The Trustee obtains information to assess the member experience through key performance indicators and regular administration meetings with Nestlé Pensions, to monitor standards of administration and record keeping for the DC section of the Fund. As described in Section 5 of this statement (see below), the Trustee is comfortable with the quality and efficiency of the administration processes.
- The Trustee receives confirmation from Nestlé Pensions of the current position with regards to common and conditional data checks and any amendments which may be required to rectify gaps in data. Common data checks are carried out quarterly and results reported back to the Trustee. Conditional data checks are carried out periodically.
- The Fund's internal controls are monitored in regular administration meetings with Nestlé Pensions.

Member communications

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

- Members of the Fund have online access to their pension and information via the Fund website. A member helpline is available, and the member experience is monitored through monthly call statistics and complaints monitoring.
- The Trustee and the investment consultant work with Nestlé Pensions to design, develop and issue communications. The Fund provides members with clear, regular communications, benefit statements and 'at retirement' communications, a number of which are highly personalised to individual member circumstances.
- The Trustee also provides members with an annual newsletter as well as an annual benefit statement detailing information about the Fund and wider pensions information.
- Members have access to modelling tools and supporting information through the Fund website. The tools allow for members to set retirement goals, access contribution requirements and get an indication of income in retirement.
- Members also have access to broader financial education stories and masterclasses.

Retirement support

The Trustee believes it is important to have retirement processes that enable members to make informed decisions and select appropriate option(s) at retirement.

- Members are provided with information on approaching retirement including a personalised illustration.

- Members are also provided with financial planning tools and educational webinars via the website to assist with their pension planning.
- At retirement support and guidance is currently provided to members via Origen Financial Services. If members have their own Independent Financial Adviser in place, Nestlé will also meet some of this cost.
- Nestlé also provides members with access to annuity broking via Hargreaves Lansdown. This is an open market service which compares different annuity options available and also supports members in the selection and purchasing of an annuity should they choose to do so.

Note in relation to legacy AVCs held with Standard Life

The DCC carried out a review of the legacy AVC arrangement comprised in the Standard Life policy held within the Fund, in February 2023. While there are features of the With Profits Funds held in the arrangement that are beneficial to members, there are no guaranteed returns, and both With Profits Funds have a relatively high annual charge. The DCC plan to carry out further quantitative analysis to assess the benefits of transferring the assets currently held in the legacy AVC funds into the main DC Section held with Fidelity. A wider project is ongoing to update and improve the functionality and capabilities of the Fund's administration platform. This project is due to complete during 2026. Following this, the DCC plans to undertake a follow-up review of the AVC arrangements and consider further action to support member outcomes. Further detail will be included in next year's statement.

Overall conclusion of the Value for Members assessment

In recognition of the above, the Trustee's assessment concluded that the TER and transaction costs borne by Fund members represent good value for members relative to the benefits of Fund 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 Fund, transfers between different investments within the Fund and payments to and in respect of members/beneficiaries.

The majority of the core financial transactions are undertaken on behalf of the Trustee by the Fund administrator, Nestlé Pensions. The Company is responsible for ensuring that contributions are paid to the Fund promptly and accurately. The timing of such payments is monitored by the Trustee from quarterly administration reports submitted by Nestlé Pensions.

In order to determine how well Nestlé Pensions is performing, the Trustee has service level agreements ("SLA") in place with Nestlé Pensions. These SLAs detail a number of key administration processes to be performed and the target timescale within which each of these processes needs to be completed. There are SLAs in place for all core financial transactions. Under the current SLA, Nestlé Pensions aims to accurately complete all activities within different timeframes, depending on the criticality and complexity of the task. The agreement for time critical processes such as investment of monthly contributions is three working days from receipt, and the SLA target increases to 20 working days for more complex member enquiries such as transfer out settlements.

The Trustee has also reviewed the key processes adopted by the administrator and output in order to minimise the risks of inaccurate or late payment of core financial transactions. Key processes include:

- Provision of quarterly administration reports from Nestlé Pensions to the Trustee including information regarding: member statistics; payment schedules and contribution summary; service level analysis; Trustee discretions; member complaints; and any errors. This enables the Trustee to check core financial transactions and review processes relative to any member complaints made.
- The Nestlé Pensions DC processing team performing a reconciliation of monthly contributions between the pension administration system and the DC platform provider, Fidelity. There is a strict review process for all core financial transactions, including checks for all investment and banking transactions prior to processing and authorised by separate individuals within Nestlé Pensions Accounts and the Member Services teams.
- The Nestlé Pensions DC processing and accounts teams monitoring the DC bank account each day and reconciling the DC bank account each month. Ongoing staff training on the processing of core financial transactions, including the use of a training log to monitor progress of training against case types.

In addition, Nestlé Pensions meets with the GCC on a quarterly basis to discuss the administration of the Fund. These meetings provide an opportunity to discuss any issues that might arise.

The Trustee is satisfied that over the period:

- Nestlé Pensions were operating appropriate procedures, checks and controls and operating within the agreed SLA; over the 12 months to 31 December 2025, Nestlé Pensions met the SLA requirements with over 96% of activities completed within the service target levels;
- 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 during the Fund Year.

Legacy AVCs held with Standard Life

With regard to the Standard Life AVC policy held within the Fund, the Trustee has received statements from Standard Life on their business continuity and business resilience policy. Whilst the Trustee has not received specific information relating to core financial transactions from Standard Life, a copy of their internal controls report was received. From the information received, the Trustee is satisfied that the processes and audit procedures that Standard Life has in place ensure that all core financial transactions relating to the legacy AVC arrangement are processed in an accurate and timely manner.

6. Trustee's 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 Fund as a whole and not solely the DC Section but all are relevant to the DC Section.

During the Fund Year, the Trustee Board has ensured that it has:

- **Working knowledge of the trust deed and rules** – for example, by consulting the relevant documents regarding their specific application to the Fund as the need arises. The Fund uses an online system for providing meeting papers and this also has a directory where all Fund documents (including the Trust Deed and Rules, SIP and policy documents) are held. All Trustee Board Directors have access to this;
- **Working knowledge of the current SIP through the ongoing conduct of Fund business** – for example, the SIP is reviewed annually in conjunction with the DC investment consultant and presented at the DCC meeting. Any investment changes are made with reference to the SIP. The SIP is also available online;
- **Working knowledge of all documents setting out the Trustee Board's current policies** - for example, the Trustee Board reviews its various policies as required and makes any updates when needed;
- **Sufficient knowledge and understanding of the law relating to pensions and trusts** – for example, all Trustee Directors have completed the Trustee Toolkit (an online learning programme from The Pensions Regulator aimed at trustees of occupational pension schemes). During each Fund Year, it is expected that the Trustee Directors will continue to satisfy the TKU requirements by undertaking individual training and completing an ongoing programme of training throughout the year as a full Trustee Board. Every Trustee Director is made aware of the requirements of sections 247 and 248 of the 2004 Act (requirements for knowledge and understanding). Individual training needs are identified and managed accordingly. Training that is specific and tailored to the work of the Trustee Board and the decisions the Trustee Board will be making is provided as work is progressed and decisions are taken. During the Fund Year, the Board also received presentations on the Pensions Dashboards Programme, an overview of the key aspects of the Pension Schemes Bill relevant for DC schemes; and
- **Sufficient knowledge and understanding of the relevant principles relating to the investment and governance of DC occupational schemes** – for example, during the Fund Year, the DCC received training from their investment advisers on the DC market, specific investment types and the rebalancing mechanism within the default lifestyle strategy. The DCC has shared updates relating to its training with the whole Trustee Board. Over the course of the Fund Year, the full Trustee Board received training from its advisers on a range of topics relevant to DC benefits and DC governance, including a deeper understanding of the benefit specification process that has been undertaken in preparation for the migration to the new administration platform in 2026, and the fraud and cyber risks faced by pension arrangements. The Board also planned for the 2025 Task Force on Climate Related Financial Disclosures ("TCFD") report which included an update of the Fund's climate-related metrics.

Trustee Board effectiveness

The Nestlé Pensions team previously undertook a review of the performance and effectiveness of the Trustee Board. The review concluded that the Board was working well but that Board effectiveness could be developed further, so a training plan was agreed and implemented with the Fund advisers to further enhance the Board's capabilities in this respect.

Following discussions, it was agreed that:

- There would continue to be a focus on the Trustee's "ways of working";
- There was significant support available from the advisers, including the Nestlé Investment Team; and
- Feedback from the Trustee would be requested in order to continually improve the ways of working.

The Nestlé Pensions Learning and Development Officer was appointed to support these initiatives. Additionally, this officer conducts at least two formal development and training sessions annually for the Trustee Board to ensure they are comprehensively updated on emerging issues. The Learning and Development Officer takes feedback from the Trustee to formulate and refine future sessions.

Role of the DCC

In addition to the Trustee Board having an effective knowledge and understanding of the DC benefits, the Trustee Board's DC sub-committee is given a number of responsibilities in respect of defined contribution benefits provided by the Fund. The purpose of the DCC is to allow the Trustee Board to allocate resources effectively and so that where DC focus is valuable, a group that is dedicated to considering DC issues is available.

The Chair of the DCC reports to the Trustee Board on DC matters during the quarterly main Trustee Board meetings. This ensures that in addition to the specialist knowledge, which is contained within the DCC, collectively the Trustee Board has good knowledge and oversight of the defined contributions aspects of the Fund.

Where necessary, the DCC refers matters to the Trustee Board. This aligns with the Terms of Reference in place for the DCC.

Trustee Board Development Day

During the Fund Year, the Trustee Directors participated in two development days. The DC topics covered during these sessions included:

- An overview of the dark web and Nestlé's internal data controls
- Understanding Trustee Delegated Powers and when they are used.

The primary objective of these sessions was to improve Board effectiveness by enhancing and supporting collective knowledge and understanding by exploring the cyber security risks and the controls in place, as well as receiving a refresher session on their delegated powers.

Advice obtained

Over the Fund Year, the Trustee Board received advice on investment matters from Aon and Gallagher, legal matters from Sackers and on other issues from other advisers as necessary. The Trustee Board's advisers attended Trustee Board meetings and sub-committee meetings as appropriate, and their advice included training and/or the provision of relevant information to support decision-making. The Trustee Board also had access to regular bulletins and newsletters from its advisers.

Planning meetings are also arranged for all full Trustee Board and DCC meetings. Representatives from Nestlé Pensions, Sackers (Trustee Board planning meetings) and Aon (DCC planning meetings) attended these to ensure that service and technical aspects are explained and

understood and that the training and information needed to support the Trustee Board's TKU and effective decision making were provided at the right time.

Experience

The DCC is a well-resourced committee with several Trustee Directors who have been committee members for many years. It is also important to ensure that the DCC evolves over time and expands the DC experience of the wider Trustee Board.

All Trustee Directors on the DCC had specific training on DC matters during the Fund Year. This included sessions at meetings on 21 May 2025, 10 September 2025, 18 November 2025 and 24 November 2025.

Collectively, the Trustee Board benefits from the diverse set of skills brought by the individual Trustee Directors from their various professional backgrounds. In particular, the Trustee Board can draw upon individual professional experience in accountancy, project and risk management, and business which provides valuable insight from different perspectives. Additionally, the Chair of the Trustee Board is an Accredited Professional Trustee with wide ranging DC experience, including 10 years chairing one of the UK's largest Authorised DC Master Trusts. The Chair is also a member of the DCC. There is also a second independent trustee on the Board with extensive trustee experience on other large pension schemes, who also holds positions on various industry bodies. The different skill sets brought by the individual Trustee Directors helps to provide for a strong and complementary composition of the Board.

In addition, there is an experienced Head of Investment and Risk who supports the Board and brings ideas on emerging market practice in relation to DC to the Trustee Board. There is also a dedicated Head of Engagement with extensive pensions communications expertise who works with the DCC to develop and implement clear, effective and engaging communications materials.

Training

All training undertaken during the Fund Year is recorded in the relevant training log. When new Trustee Directors are appointed, they are expected to complete the Trustee Toolkit within 6 months of appointment and they are supported to complete the Fund's Trustee Director Onboarding Plan which is designed and co-ordinated by Nestlé Pensions to bring new Trustee Directors up-to-speed on the core trustee role, Fund-specific documents and ways of working. Additional Fund-specific training is also made available to them.

As previously mentioned, the Chair of the Trustee Board is a professional Trustee. As part of professional practice standards, the Chair is required to undertake relevant ongoing training each year and to log this with his professional body and firm. It is intended that further work regarding Trustee Board effectiveness will continue to be undertaken and that regular reviews will be carried out going forwards.

Throughout the Fund Year, all Trustee Directors have been encouraged to raise issues (e.g. any knowledge gaps or areas where they would find additional training helpful) or suggestions and have easy access to the Chair in order to do this. This will continue on an on-going basis.

The Trustee Board considers that:

- The initial training programme in place for new Trustee Directors;
- The ongoing Trustee training and development initiatives described above and carried out over the course of the Trustee Directors' appointments;
- The evaluation of ongoing performance and effectiveness of the Trustee Board and the identification of training needs; and

- The extensive support and professional advice available to Trustee Directors, which is structured to take account of matters likely to arise for consideration by the Board

enables the Trustee Board to properly exercise its function as Trustee of the Fund and to meet the requirements of sections 247 and 248 of the Pensions Act.

Signed on behalf of the Trustee of the Nestlé UK Pension Fund by the Chair of Trustee

Name	Steve Delo
Signature	<i>Steve Delo</i>
Date	31 July 2026