INEOS Chemicals Pension Plan

Investment Implementation Document ("IID")

This Investment Implementation Document ("IID") covers the INEOS Chemicals Pension Plan (the "Plan") and details the policy of the Trustee relating to the implementation of the Plan's investment arrangements, based on the Principles set out in the Plan's Statement of Investment Principles ("SIP").

Investment strategy

The table below reflects the current investment strategy, which is invested according to the following broad asset allocation:

Asset Class	Proportion (%)	Control Ranges (%)	Expected Return (relative to fixed interest gilts)[1] %
Return-Seeking Assets	***40.0***	***30.0-50.0***	
Multi-Asset Credit (1)	12.5	-	2.6%
Multi-Asset Credit (2)	7.5	-	3.3%
Passive Global Equities (GBP Hedged)	10.0	-	4.0%
Infrastructure Equity	10.0	-	4.9%
Risk-Reducing Assets	***60.0***	***50.0-70.0***	
Absolute Return Bonds	10.0	-	1.5%
Liability Driven Investment	50.0	-	0.0%
Total	100.0	-	

(1) Expected returns are 10 year assumptions (net of investment management fees) as at 30 June 2025.

The Trustee acknowledges that during periods of heightened market volatility the asset allocation may be out of line with the benchmark and/ or control ranges.

The Plan currently holds a small allocation to a Direct Lending mandate with Permira (currently c.0.5% of total Plan assets), however, this mandate is distributing capital back to the Plan and is expected to completely unwind over the next year. Therefore, no allowance has been made for this mandate in the above asset allocation. We include reference to this manager, however, as required below given they are an existing investment.

The expected returns shown in the above table represent long-term expectations of asset classes as a whole. Short-term returns in some asset classes may exhibit considerable variability.

The Plan's present investment objective is to achieve a return of c.1.9% per annum above the return on UK Government bonds (which are assumed to move in a similar fashion to the calculated value of the Plan's liabilities).

The Trustee has agreed to hedge liabilities for both rates and inflation up to c.97% of Technical Provisions liabilities. The Trustee notes that the liability benchmark is derived at a particular point in time and hence the degree of liability hedging may drift over time due to various factors such as experience. On an annual basis the Trustee will determine whether the liability benchmark should be reviewed. If a review is undertaken the Trustee will then decide whether any action is required and/or if any discrepancies are within an acceptable degree of tolerance.

The Trustee will retain sufficient return generating assets in order to achieve full funding on a lower risk basis in a sensible timeframe.

LDI governance structure

The Trustee has delegated certain discretions to Legal and General Investment Management (L&G) in order to manage the hedge ratios relative to a liability benchmark within certain agreed parameters.

In order to manage the amount of leverage within the LDI funds, L&G will inform the Trustee of the amount of any required cash collateral call. In the absence of sufficient capital within the discretionary hedging mandate in order to meet a cash collateral call (requiring the Plan to top up the investment in the LDI funds), L&G will automatically disinvest from L&G cash, bond or equity funds in accordance with their rebalancing instructed waterfall. The Trustee will monitor the overall LDI allocation collateral levels on an ongoing basis, and rebalance total Plan assets where appropriate.

Investment structure and mandates

The Trustee has invested in pooled funds managed by the following investment managers. All the investment managers are regulated under the Financial Services and Markets Act 2000.

Investment Manager	**Mandate**	**Proportion %**
Legal & General Investment Management Limited ("L&G")	Passive Global Equities (GBP Hedged)	10.0
	Liability Driven Investment	50.0
	Absolute Return Bonds	10.0
J.P. Morgan Asset Management ("JPM")	Infrastructure Equity	10.0
M&G Investments ("M&G")	Total Return Credit Fund	12.5
Wellington Management Company LLP ("Wellington")	Multi-Sector Credit Fund	7.5
Permira Advisors LLP	Direct Lending	-
TOTAL		100.0

Mandate target returns, objectives and fees

L&G – passive global equities – World Equity Index Fund – GBP Currency Hedged

Benchmark	Objective	Fees
FTSE All World Index – GBP Currency Hedged	Track the benchmark	0.125% p.a.

L&G are to invest in the World Equity Index Fund – GBP Currency Hedged and their performance objective is to match the return on the FTSE All World Index – GBP Currency Hedged.

L&G – liability driven investment – Single Stock Gilt Fund Range and Matching Plus Fund Range

Benchmark	Objective	Fees
Range of gilt indices	Bespoke	Fund management fee: Single Stock Gilt Fund Range: 0.0325% p.a. Matching Plus Fund Range: 0.11% p.a. Discretionary hedging mandate fee: 0.03% p.a. subject to a minimum fee of £35,000 p.a.

L&G are to invest in a range of physical nominal gilt funds, physical index-linked gilt funds (collectively referred to as the Single Stock Gilt Fund Range), leveraged nominal gilt funds and leveraged index-linked gilt funds (collectively referred to as the Matching Plus Fund Range) that aim to hedge a proportion of the interest rate and inflation risk inherent within the Plan's liabilities.

L&G – Absolute Return Bonds – Global Unconstrained Bond Fund

Benchmark	Objective	Fees
3-month SONIA	3-month SONIA + 1.50% (gross)	0.25% p.a.

JP Morgan – infrastructure equity - Infrastructure Investments Fund

Benchmark	Objective	Fees*
N/A	Target 8-12% IRR and a cash yield of 5-7% p.a.	0.82% p.a.

*An Incentive Fee is charged at 15% of the excess return over a hurdle rate of 7% time-weighted returns, subject to the Incentive Fee Cap. The Incentive Fee Cap ensures there will be no Incentive Fee earned for any returns in excess of 13.5% p.a. Investors are expecting to receive a 5% discount to management fees each time the aggregate NAV of the Fund exceeds an additional $10bn.

JP Morgan are to invest in a range of infrastructure equity investments in order to meet their target return objectives of 8-12% capital return on IRR and a cash yield of 5-7% p.a.

M&G – Multi-Asset Credit – Total Return Credit Fund

Benchmark	Objective	Fees
1 Month SONIA	1 Month SONIA + 3.0% (gross of fees)	0.45% p.a.

M&G are to invest across the credit universe and aim to generate a return of SONIA plus 3% p.a. (gross of fees) over a rolling three-year period. The default duration of the Fund will be zero.

Wellington – Multi-Asset Credit – Multi-Sector Credit Fund

Benchmark	Objective	Fees
N/A (total return)	5-7% p.a. over a market cycle	0.45% p.a.*

* The Plan benefits from an overall client relationship discount.

Wellington do not construct the Fund relative to a benchmark and do not use a benchmark for performance comparison purposes.

Permira – direct lending – Permira Credit Solutions III (Senior Fund) GBP Hedged

Benchmark	Objective	Fees
N/A (absolute return)	Achieve a net internal rate of return of 6-8% p.a.	1.00% p.a. on invested capital during the Investment Period, which is defined as three years from final closing. Invested capital refers to the proportion of the Plan's commitment that has been drawn down. 0.75% p.a. on invested capital following the Investment Period.

Permira do not have a stated investment objective, however we typically compare performance to sterling 1-month SONIA plus 4% per annum for illustration purposes only.