Appendix 1

DC Default Strategy Statement

1. Introduction

This statement is prepared in accordance with regulation 2A of the Occupational Pension Schemes (Investment) Regulations 2005. It describes the Trustees' investment principles and arrangements in respect of the default investment options under the Defined Contribution (DC) Section of the Unilever UK Pension Fund.

2. Aims and objectives underlying the Default Investment Arrangements

The Trustees recognise that members of the DC section have differing investment needs and objectives, and that these may change during the course of members' working lives. The Trustees also recognise that members have different attitudes to risk. The Trustees believe that members should be encouraged to make their own investment decisions based on their individual circumstances. We therefore make available a range of investment options and automatic switching strategies, within the framework set out in the Fund rules, to enable members to tailor their investment strategy to their own needs.

The Trustees also recognise that members may not believe themselves qualified to make choices about investment options. The Fund rules provide for default investment options and specifies the investment objective that comprises its key components. There are two default investment options, depending on whether the member is a DB Retirement Account Member ("hybrid") (generally with both DB and DC benefits), or a DC Retirement Account member ("DC only"). The Trustees usually refer to hybrid members as Investing Plan members and the DC only members as Retirement Savings Plan members. Consistent with the Fund objective the default investment options chosen by the Trustees aim to deliver real returns over members' working lifetimes, whilst mitigating risk through diversification through holding different equity and bond classes, property and cash. It also encompasses a switch into less risky asset classes in the years prior to age 65. The ultimate objective is that funds at retirement are invested in assets broadly appropriate for an individual withdrawing the funds as cash for hybrid members, and that funds are invested in assets broadly appropriate for an individual planning to draw down their retirement income over time for DC only members. There are three component funds in the default strategies: Moderate Growth Fund, Cautious Growth Fund and Cash Fund, and their objectives are below:

Fund	Investment Objectives	Policy in relation to investments
Moderate Growth Fund	Achieve a return over the long term (5 years or more) that exceeds the return on the cautious growth fund (albeit with a higher prospect that a negative absolute return could be experienced over the same period than the cautious growth fund)	A pooled fund made available to the Trustee by Fidelity for the purposes of the UUKPF, where unit prices are calculated by reference to a mix of some or all of equities, property, government bonds, corporate bonds, other diversified assets, cash/money market funds, and any other assets with similar investment characteristics as decided from time to time by the Trustee having taken the advice of its investment adviser, with an asset allocation selected to be consistent with the investment objective in the second column.
Cautious Growth Fund	Achieve a return over the long term (5 years or more) that exceeds the return on the cash fund (albeit with a higher prospect that a negative absolute return could be experienced over the same period than the cash fund)	A pooled fund made available to the Trustee by Fidelity for the purposes of the UUKPF, where unit prices are calculated by reference to a mix of some or all of equities, property, government bonds, corporate bonds, other diversified assets, cash/money market funds and any other assets with similar investment characteristics as decided from time to time by the Trustee having taken the advice of its investment adviser, with an asset allocation selected to be consistent with the investment objective.
Cash Fund	Preserve capital whilst aiming to provide a return on investments similar to that which might be achieved on cash deposits in a bank or building society	A pooled fund made available to the Trustee by Fidelity for the purposes of the UUKPF, where unit prices are calculated by reference to a mix of some or all of cash deposits, money market funds and any other assets with similar

Fund	Investment Objectives	Policy in relation to investments
		investment characteristics as decided from time to time by the Trustee having taken the advice of its investment adviser, with an asset allocation selected to be consistent with the investment objective

In light of the above, the Trustees have adopted the following objectives in relation to the default arrangements:

- To generate a good level of real return over members' working lifetimes, whilst mitigating risk through diversification.

  The growth phase structure for both default arrangements invests in the Moderate Growth Fund. This Fund holds a diversified range of assets that is expected to provide long term returns similar to those of equities, but with less volatility.

- To provide a strategy that reduces investment risk for members as they approach retirement.

  As a member's account grows, investment risk will have a greater impact on retirement outcomes. Therefore, the Trustee believes that a default arrangement that seeks to reduce investment risk as the member approaches retirement is appropriate. This is achieved via automatic switching over a 10 year switching period before retirement. Initially funds are switched from the Moderate Growth Fund to the Cautious Growth Fund. This gives members' accounts the opportunity to still grow at a reasonable rate and stay 'diversified' – that is, spread across a range of investments. For Hybrid members, during the last 4 years before retirement age, funds are switched into the Cash Fund. For DC only members, during the last 3 years before retirement age, 25% of funds are switched into the Cash.

- To invest members' accounts at retirement in assets that are broadly appropriate considering the likely form in which they will draw benefits. This assumes that hybrid members will likely withdraw funds at retirement as cash, whereas DC only members will likely draw down their retirement income over time.

  At age 65, for hybrid members, 100% of the member's assets will be invested in the Cash Fund reflecting the fact that most members will have acquired significant DB (Defined Benefit) rights (relative to their DC benefits) and will therefore wish to use their account to provide cash rather than additional income. At age 65, for DC only members, 75% of the member's assets will be invested in the cautious growth fund, with 25% invested in the Cash Fund. This reflects the fact that most of these members will likely want to transfer out of the UUKPF and keep their account invested while drawing an income from it over time, 25% of which would be as tax free cash.

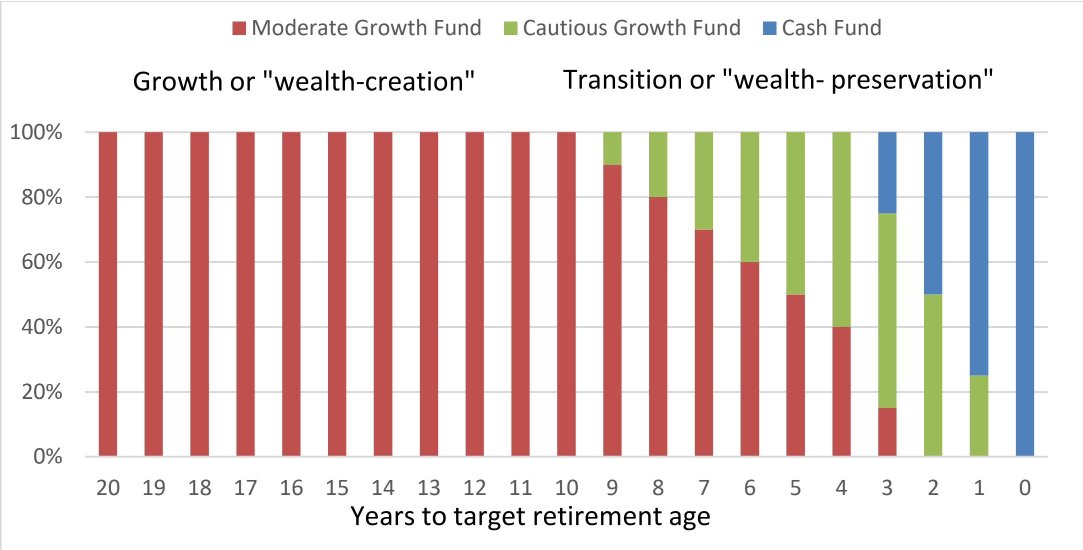
- To achieve a market return, subject to fees, broadly equivalent to the composite benchmark (for each Default Fund) which is comprised of the indices of each of the underlying sub funds as outlined in section 8.

The Trustees monitor market performance on a quarterly basis.

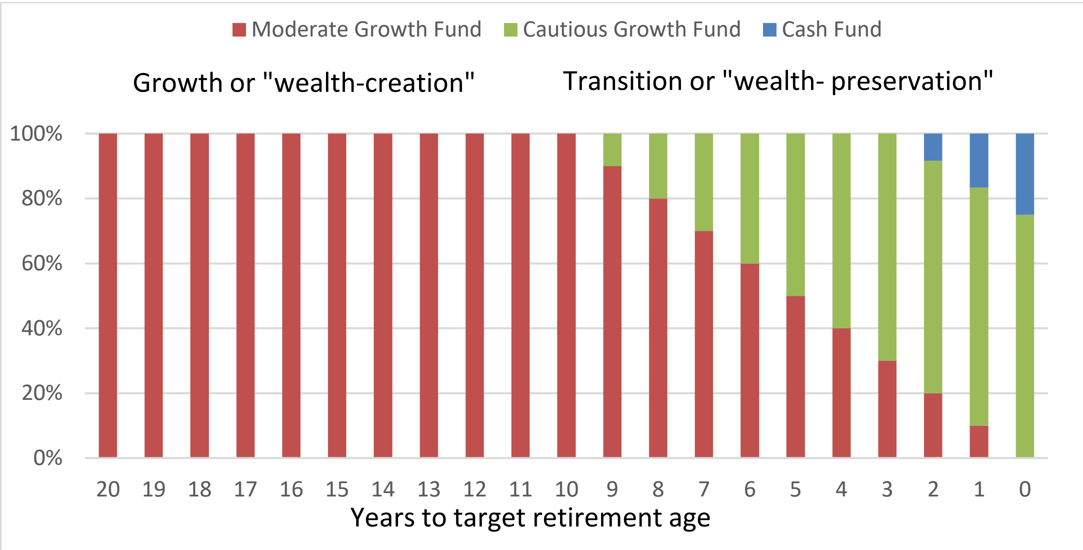
3. Investments

Members within the default arrangements are invested in a 100% allocation to the Moderate Growth Fund whilst they are at least 10 years from the target retirement age. As the member approaches retirement, assets are gradually moved to the Cautious Growth Fund, and then the Cash Fund as shown in the switching matrices below.

Hybrid



DC Only



4. Measurement and management of risk

Risk is not considered in isolation, but in conjunction with expected investment returns and retirement outcomes for members. In designing the default arrangements, the Trustees have explicitly considered the trade-off between risk and expected returns. The specific risks of which the Trustees take account include, but are not limited to:

Risk of underperformance: a fund offered by the Trustees may not meet the relevant investment objective with regard to performance. This risk is considered by the Trustees and their investment adviser within the ongoing review of the performance of the funds.

Risk of fraud, poor advice or acts of negligence: the Trustees seek to minimise this risk by ensuring that their advisers and third-party service providers are suitably qualified and experienced, that suitable liability and compensation clauses are included in all contracts for professional services and that suitable due diligence is done on a regular basis.

Risk of the default investment option being unsuitable for the requirements of some members: this risk is addressed by giving members a range of options, one of which is the default investment option. Members are provided with a diversified, but limited, range of options which they can choose bearing in mind their attitudes to risk, expectations of returns and intentions with regard to retirement. The Trustees assist members to make suitable choices that may better fit their personal circumstances through communications, including the web portal. Also members in any of the automatic switching arrangements, including the default investment arrangements, are contacted before switching starts.

5. Responsible Investment and Corporate Governance

The Trustees are signatories to the Principles for Responsible Investment (PRI) through the Unilever Pension Funds umbrella agreement. The Trustees believe that investing sustainably allows it to better assess the value and likely future performance of an investment over the medium to long-term. Sustainable investing is about generating a long-term risk adjusted return aligned with the Fund's objectives, whilst at the same time promoting a stable, well-functioning and well governed social, environmental and economic system on which long-term sustainable returns are dependent. The Trustees currently do not take into account any factors we consider to be non-financial. However, this is reviewed on a periodic basis.

Of the environmental factors the Trustees take into account, we believe that climate change presents the greatest risk to the long-term value and security of the Fund's assets. The Trustees believe that these environmental factors will have significant and wide-ranging implications for the global economy for the foreseeable future and the potential to impact the dynamics of global growth.

Implementation:

It is the Trustees' policy that all matters are taken into account in the selection, retention and realisation of investments to the extent that they are materially relevant in assessing the future prospects of specific investments, including Sustainability considerations.

The assets are invested in pooled funds but the Trustees require all equity managers to have a Sustainability policy in place and to be signatories to the UN PRI as a minimum. The Trustees have given the appointed investment managers full discretion in evaluating Sustainability factors, including climate change considerations. Fixed income managers must also take Sustainability risk factors into account when appropriate. An external stewardship provider carries out the voting and engagement for the global developed market equities. Voting and engagement for other funds is carried out by the investment managers of the respective pooled funds, in conjunction with their appointed stewardship providers, where applicable.

The Fund invests in Sustainable Equity funds, which have sustainability goals designed to be aligned with the Trustee's Sustainability policy. Due to the importance of Sustainability, these have been included within the default investment option and provides all of the Fund's Global Developed Equity holdings. Details of the arrangements for each underlying fund manager are set out in legal agreements between the manager and the relevant platform provider or pooled fund provider. The Trustee does not have any direct arrangements with any of the underlying fund managers and further detail of those arrangements is not therefore included in the SIP.

The Trustees have a Sustainability policy which sets out further details, including further information on the implementation of the policy.

6. Other policies in relation to the default investment arrangements

The Trustees believe that both actively and passively managed funds have a role to play. Active managed funds are utilised to the extent that we either have a high level of confidence in the respective investment managers achieving their performance objectives, or we believe risk is better controlled, net of active investment management fees, within that asset class. For this reason the holdings in the Moderate and Cautious Growth Funds are managed using active and passive management.

Assets in the default arrangements are invested in daily traded pooled funds which hold highly liquid assets. This provides members with greater diversification and transparency of value than if the Trustees invested directly in securities. It also simplifies the administration. The selection, retention and realisation of assets within the pooled funds are delegated to the investment managers in line with the mandates of the funds.

All of the pooled funds used are dealt daily.

The default arrangements do not currently invest in illiquid assets, as at the last strategy review the chosen strategy was considered most suitable to meet members' needs while also offering value for money and flexibility. The default arrangements do however have an allocation to a listed property equity fund, which aims to provide some of the benefits of an allocation to illiquid assets (such as diversification) in a cost effective and liquid way. The Trustees do not currently have any plans to invest in illiquid assets, however the Trustees will monitor the market to look for suitable future opportunities and will continue to review the approach in future investment strategy reviews.

The strategic asset allocation of each of the three funds that comprise the default investment arrangements is shown below in section 8.

7. Suitability of the default investment arrangements

The Trustees believe that the above aims, objectives and policies ensure that the default investment arrangements are designed in members' interests. Their reasons are as follows:

- Most hybrid members who retire withdraw their account as tax free cash, reflecting the fact that their DC benefits are supplementary to members' DB pension rights and their requirement for a secure income in retirement will be addressed by that component of their Fund benefits.
- However, for DC only members, the DC benefits will likely provide the majority of their retirement income. They are therefore expected to draw down a retirement income over time.
- Modelling of future outcomes suggests that hybrid members will be able to withdraw a significant proportion of their account as tax free cash over the long-term. Market studies of member behaviour show that DC Only members commonly draw 25% of their benefits as tax free cash at retirement.
- Despite this, members will likely wish to achieve real investment returns for most of their period as pension savers. The use of the Moderate Growth Fund and Cautious Growth Funds address that requirement.

Note that members who intend withdrawing their retirement benefits in other ways, have the option of adopting an alternative lifestyle strategy prior to retirement or choosing their own investment strategy.

The Trustees are aware that over time there may be changes to how members choose to withdraw benefits at retirement. We therefore monitor members' decisions and other data items at least annually as part of an ongoing programme for ensuring that the default investment arrangements remain suited to member needs. We also review the investment choices available to members to ensure that those who regard the default arrangements as unsuited to their needs have suitable alternative investment funds to select from.

8. Default Strategy Funds: Manager Structure and Allocations

Moderate Growth		
Public Equities	**64.0%**	
Global Equity (developed market multi-factor ESG)		*46.4%*
Global Equity (developed market Active ESG)		*11.6%*
Emerging Market Equity (Passive Aquila Connect)		*6.0%*
Real Assets	**10.0%**	
Listed Property (Passive Global Property Securities)		*10.0%*
Fixed Income	**26.0%**	
Multi-Asset Credit (evenly split across two mandates)		*26.0%*
Total	**100%**	
Cautious Growth		
Public Equities	**30.0%**	
Global Equity (developed market multi-factor ESG)		*21.6%*
Global Equity (developed market Active ESG)		*5.4%*
Emerging Market Equity (Passive Aquila Connect)		*3.0%*
Real Assets	**7.5%**	
Listed Property (Passive Global Property Securities)		*7.5%*
Fixed Income	**50.0%**	
Multi-Asset Credit (evenly split across two mandates)		*25.0%*
Fixed Interest Gilts (Passive Over 15 Year Gilt Aquila Connect)		*12.5%*
Index Linked Gilts (Passive Over 5 Year Index Linked Gilt Aquila)		*12.5%*
Cash	**12.5%**	
Cash (Active Cash fund)		*12.5%*
Total	**100%**	
Cash		
Cash (Active Cash fund)	**100%**	