



# Statement of Investment Principles

For the Trustees of the Sutcliffe Speakman Pension & Life Assurance Scheme

February 2021

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# 01 Introduction

## Purpose

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This document constitutes the Statement of Investment Principles ("the SIP") required under Section 35 of the Pensions Act 1995 for the Sutcliffe Speakman Pension & Life Assurance Scheme ("the Scheme"). It describes the investment policy being pursued by the Trustees of the Scheme and is in accordance 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.

## Scheme details

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The exclusive purpose of the Scheme is to provide retirement and death benefits to eligible participants and beneficiaries. It qualifies as a registered pension scheme, registered under Chapter 2 of Part 4 of the Finance Act 2004.

## Advice and consultation

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Before preparing this Statement, the Trustees have sought advice from the Scheme's Investment Consultant, XPS Investment Limited. The Trustees have also consulted the Principal Employer. The Trustees will consult the Principal Employer on any future changes in investment policy as set out in this Statement.

## Investment powers

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The Scheme's Trust Deed and Rules set out the investment powers of the Trustees. This Statement is consistent with those powers. Neither this Statement nor the Trust Deed and Rules restricts the Trustees' investment powers by requiring the consent of the Principal Employer.

In accordance with the Financial Services and Markets Act 2000, the Trustees set general investment policy but delegate responsibility for the selection of the specific securities and any financial instruments in which the Scheme invests to the Investment Managers.

## Review of the Statement

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The Trustees will review this Statement and their investment policy at least every three years in conjunction with each triennial valuation or immediately following any significant changes in investment policy.

The Trustees will also review this Statement in response to any material changes to any aspect of the Scheme, its liabilities, finances and attitude to risk of either the Trustees or Principal Employer which it judges to have a bearing on the stated investment policy.

The Trustees will receive confirmation of the continued appropriateness of this Statement annually, or more frequently, if appropriate.

## Definitions

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Capitalised terms in this document mean the following:

*Act* – The Pensions Act 1995 (as amended by section 244 of the Pensions Act 2004);

*AVCs* – Additional Voluntary Contributions;

*Investment Manager* – An organisation appointed by the Trustees to manage investments on behalf of the Scheme;

*Principal Employer* – Chemviron Carbon Limited;

*Recovery Plan* – The agreement between the Trustees and the Principal Employer to address the funding deficit;

*Scheme* – The Sutcliffe Speakman Pension & Life Assurance Scheme;

*Statement* – This document, including any appendices, which is the Trustees' Statement of Investment Principles;

*Technical Provisions* – The amount required, on an actuarial calculation, to make provision for the Scheme's liabilities;

*Trust Deed and Rules* – The Scheme's current Deed and Rules dated 20 May 2016.

*Trustees* – The collective entity responsible for the investment of the Scheme's assets and managing the administration of the Scheme;

*Value at Risk* – A technique which uses historical correlations of asset class returns and volatilities to estimate the likely worst-case scenario loss for a given portfolio of assets.

# 02 Strategic investment policy and objectives

## Choosing investments

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The Trustees rely on professional Investment Managers for the day-to-day management of the Scheme's assets. However, the Trustees retain control over some investments. In particular, the Trustees make decisions about pooled investment vehicles in which the Scheme invests and any AVC investment vehicles.

The Trustees' policy is to regularly review the investments over which they retain control and to obtain written advice about them when necessary. When deciding whether or not to make any new investments the Trustees will obtain written advice and consider whether future decisions about those investments should be delegated to the Investment Managers. The written advice will consider suitability of the investments, the need for diversification and the principles within this Statement. The adviser will have the knowledge and experience required under Section 36(6) of the Act.

## Long-term objectives

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The primary objective of the Trustees is to seek to ensure the Scheme is able to meet the benefit payments promised as they fall due from a combination of investment returns and planned contributions.

Having regard to the primary objective, the Trustees have set the following objectives:

- To achieve a fully funded position on a Technical Provisions basis by 31 March 2023. In particular, the discount rate (as defined in the Statement of Funding Principles) used in calculating the value of assets required underpinning that target is the gilt yield curve + 0.25% at each term.
- To implement an investment strategy targeting a best estimate return of 1.0% in excess of gilts, where gilts are represented by the yield on the Bank of England yield curve.
- To acquire suitable assets to achieve the above objective whilst controlling volatility and the long term costs of the Scheme.
- To adhere to the provisions contained within this SIP.

## Expected returns

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By undertaking the investment policy described in this Statement, the Trustees expect future investment returns will at least meet the rate of return underlying the Recovery Plan.

## Investment Policy

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Following advice from the Investment Consultant, the Trustees have set the investment policy and objectives with regard to the Scheme's liabilities and funding level.

The Trustees intend to achieve these objectives through investing in a diversified portfolio of return-seeking assets (e.g. multi sector credit and buy & maintain credit funds) and liability matching assets (e.g. LDI). The Trustees recognise that the return on return-seeking assets, whilst expected to be greater over the long-term than that on liability matching assets, is likely to be more volatile. A mixture across asset classes should nevertheless provide the level of returns required by the Scheme to meet its liabilities at an acceptable level of risk (of underperforming the liabilities) for the Trustees, and an acceptable level of cost to the Principal Employer.

The investment policy the Trustees have adopted is detailed in Appendix I. The specific Investment Manager mandates against which performance of the assets will be assessed are specified in Appendix II.

## Range of assets

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The Trustees consider that the combination of the investment policy detailed in Appendix I and the specific manager mandates detailed in Appendix II will ensure that the assets of the Scheme include suitable investments that are appropriately diversified and provide a reasonable expectation of meeting the objectives. In setting out the mandates for the Investment Managers, the Trustees will ensure that the Scheme holds a suitably diversified range of securities in each category, avoiding an undue concentration of assets.

## Strategic investment policy and objectives continued

Based on the structure set out in Appendix I, the Trustees consider the arrangements with the Investment Managers to be aligned with the Scheme's overall strategic objectives. Details of each specific mandate are set out in agreements and pooled fund documentation with each Investment Manager. The amounts allocated to any individual category or security will be influenced by the overall benchmark and objectives, varied through the Investment Managers' tactical asset allocation preferences at any time, within any scope given to them through asset allocation parameters set by the Trustees or governing the pooled funds in which the Scheme is invested.

The Trustees will ensure that the Scheme's assets are invested in regulated markets to maximise their security.

Investment Managers are incentivised to perform in line with expectations for their specific mandate as their continued involvement as Investment Managers as part of the Scheme's investment strategy – and hence the fees they receive – are dependent upon them doing so. They are therefore subject to performance monitoring

and reviews based on a number of factors linked to the Trustees' expectations, including the selection / deselection criteria set out in Section 6.

The Trustees encourage Investment Managers to make decisions in the long-term interests of the Scheme. The Trustees expect engagement with management of the underlying issuers of debt or equity and the exercising of voting rights. This expectation is based on the belief that such engagement can be expected to help Investment Managers to mitigate risk and improve long term returns. As covered in more detail in Section 3, the Trustees also require the Investment Managers to take ESG factors and climate change risks into consideration within their decision-making as the Trustees believe these factors could have a material financial impact in the long-term. The Trustees therefore make decisions about the retention of Investment Managers, accordingly.

## 03 Responsible investment

The Trustees have considered their approach to environmental, social and corporate governance (“ESG”) factors for the long term time horizon of the Scheme and believe there can be financially material risks relating to them. The Trustees have delegated the ongoing monitoring and management of ESG risks and those related to climate change to the Scheme’s Investment Managers. The Trustees require the Scheme’s Investment Managers to take ESG and climate change risks into consideration within their decision-making, in relation to the selection, retention or realisation of investments, recognising that how they do this will be dependent on factors including the characteristics of the asset classes in which they invest.

The Trustees will seek advice from the Investment Consultant on the extent to which their views on ESG and climate change risks may be taken into account in any future Investment Manager selection exercises. Furthermore, the Trustees, with the assistance of the Investment Consultant, will monitor the processes and operational behaviour of the Investment Managers from time to time, to ensure they remain appropriate and in line with the Trustees’ requirements as set out in this Statement.

As the Scheme invests in pooled funds, the Trustees acknowledge that they cannot directly influence the policies and practices of the companies in which the

pooled funds invest. They have therefore delegated responsibility for the exercise of rights (including voting rights) attached to the Scheme’s investments to the Investment Managers. The Trustees encourage them to engage with investee companies and vote whenever it is practical to do so on financially material matters such as strategy, capital structure, conflicts of interest policies, risks, social and environmental impact and corporate governance as part of their decision-making processes. The Trustees require the Investment Managers to report on significant votes made on behalf of the Trustees.

If the Trustees become aware of an Investment Manager engaging with the underlying issuers of debt or equity in ways that they deem inadequate or that the results of such engagement are mis-aligned with the Trustees’ expectation, then the Trustees may consider terminating the relationship with that Investment Manager.

When considering the selection, retention or realisation of investments, the Trustees have a fiduciary responsibility to act in the best interests of the beneficiaries of the Scheme, although they have neither sought, nor taken into account, the beneficiaries’ views on matters including (but not limited to) ethical issues and social and environmental impact. The Trustees will review this policy if any beneficiary views are raised in future.

# 04 Risk measurement and management

The Trustees recognise a number of risks involved in the investment of the assets of the Scheme. The Trustees measure and manage these risks as follows:

**Solvency risk and mismatching risk** – The risk that the assets do not respond to market changes in the same way as the liabilities, resulting in volatility in the funding position, is addressed through the strategic asset allocation and through ongoing triennial actuarial valuations. In setting the investment strategy, the Trustees will consider (for example) the Value at Risk.

**Strategy risk** – The risk that the Investment Managers' asset allocation deviates from the Trustees' investment policy is addressed through regular review of the asset allocation. In reviewing the investment strategy on a periodic basis, the Trustees will consider the current economic factors affecting the asset classes in which they have invested and the short to medium term outlook for performance by reference to e.g. current and historic yields, GDP growth forecasts and other relevant factors. The Trustees will also consider how far the actual asset allocation has drifted from the strategic asset allocation and take action to rebalance if necessary.

**Liquidity risk** – The risk that assets cannot be sold quickly enough to enable benefits to be paid or that the Trustees cannot exit a particular investment is addressed through the process by which the administrator estimates the benefit outgo and ensures that sufficient cash balances are available, and through the Trustees' policy on realisation of assets (see section 5).

**Inappropriate investments** – The risk that an Investment Manager invests in assets or instruments that are not considered to be appropriate by the Trustees is addressed through the Trustees' policy on the range of assets in which the Scheme can invest (see section 2).

**Counterparty risk** – The risk that a third party fails to deliver cash or other assets owed to the Scheme is addressed through the Investment Managers' guidelines with respect to cash and counterparty management.

**Political risk** – The risk of an adverse influence on investment values from political intervention is reduced by diversification of the assets across many countries.

**Custodian risk** – The risk that the custodian fails to provide the services expected is addressed through the agreement with the third party custodian and ongoing monitoring of the custodial arrangements. In pooled arrangements this is invariably delegated to the Investment Managers.

**Manager risk** – The risk that an Investment Manager fails to meet their stated objective is addressed through the performance objectives set out in Appendix II and through the monitoring of the Investment Managers as set out in section 6. In monitoring the performance of the Investment Managers, the Trustees measure the returns relative to the benchmark, objective and the volatility of returns. In addition, the Trustees will regularly review each Investment Manager's approach to risk within each fund in order to highlight any unintended risk being taken. For example:

- For multi asset credit funds, the Trustees will consider the type and quality of the underlying assets and the volatility of each fund both in absolute terms and in comparison to the volatility of traditional credit markets;
- For buy & maintain credit funds, the Trustees will consider the type and quality of the underlying assets as well as the turnover and number of defaults and downgrades in comparison to traditional credit markets;
- For liability driven investment (LDI) funds, the Trustees will review risk through the type of instruments held and the risks associated with these investments.

**Fraud/Dishonesty** – The risk that the Scheme assets are reduced by illegal actions is addressed through restrictions applied as to who can authorise transfer of cash and the account to which transfers can be made.

**Currency risk** – The risk of losses through depreciation of non-sterling currencies is measured by reference to the exposure of the Scheme to pooled funds with unhedged currency risk and is managed by investing predominantly in sterling assets and only taking currency risk where it increases the level of diversification.

# 05 Realisation of assets and investment restrictions

## Realisation of investments

In recognition of the fact that funds may need to be realised for a number of unanticipated reasons at any time, and the desirability of retaining as high a degree of flexibility as possible to cater for unexpected changes in circumstances, the Trustees will monitor closely the extent to which any assets not readily realisable are held by the Investment Managers and will limit such assets to a level where they are not expected to prejudice the proper operation of the Scheme.

The Trustees have considered how easily investments can be realised for the types of assets in which the Scheme is currently invested. As such, the Trustees believe that the Scheme currently holds an acceptable level of readily realisable assets. The Trustees will also take into account how easily investments can be realised for any new investment classes it considers investing in, to ensure that this position is maintained in the future.

The Trustees will hold cash to the extent that it considers necessary to meet impending anticipated liability outflows. A bank account is used to facilitate the holding of cash awaiting investment or payment.

## Investment restrictions

The Trustees have established the following investment restrictions:

- The Trustees or the investment managers may not hold in excess of 5% of the Scheme's assets in investments related to the Principal Employer;
- Whilst the Trustees recognise that borrowing on a temporary basis is permitted, this option will only be utilised where it is deemed absolutely necessary or where the Trustees have received advice from the Investment Consultant that the Scheme's overall exposure to risk can be reduced through temporary borrowing, e.g. during an asset transfer;
- Investment in derivative instruments may be made only insofar as they contribute to the reduction in risk or facilitate efficient portfolio management.
- Stock lending may be permitted at the discretion of the Investment Managers in line with their overall objectives, policies and procedures.

The Investment Managers impose internal restrictions that are consistent with their house style. In some instances, the Trustees may impose additional restrictions and any such restrictions are specified in Appendix II.



# 06 Investment Manager Arrangements and fee structure

## Delegation to Investment Manager(s)

In accordance with the Act, the Trustees have appointed one or more Investment Managers and delegated to them the responsibility for investing the Scheme's assets in a manner consistent with this Statement.

The Investment Managers are authorised and regulated to provide investment management services to the Scheme. Within the UK, the authorisation and regulation of the Investment Managers falls under the Financial Conduct Authority (FCA). Specific products in which the Scheme invests may also be regulated by the Prudential Regulatory Authority (PRA). For non-UK Investment Managers, authorisation and regulation is undertaken by the home state regulator.

Where Investment Managers are delegated discretion under section 34 of the Pensions Act 1995, the Investment Managers will exercise their investment powers with a view to giving effect to the principles contained in this Statement so far as reasonably practicable. In particular, the Investment Managers must have regard to the suitability and diversification of the investments made on behalf of the Scheme.

The Investment Managers will ensure that suitable internal operating procedures are in place to control individuals making investments for the Scheme.

## Performance objectives

The individual benchmarks and objectives against which each investment mandate is assessed are given in Appendix II.

## Review process

Appointments of Investment Managers are expected to be long-term, but the Trustees will review the appointment of the Investment Managers in accordance with their responsibilities. Such reviews will include analysis of each Investment Manager's performance and processes and an assessment of the diversification of the assets held by the Investment Manager. The review will include consideration of the continued appropriateness of the mandate given to the Investment Manager within the framework of the Trustees' investment policies.

The Trustees receive quarterly performance monitoring reports from the Investment Consultant which consider

performance over the quarter, one and three year periods. In addition, any significant changes relating to the criteria below that the Investment Consultant is aware of will be highlighted, which may lead to a change in the Investment Consultant's rating for a particular mandate. These ratings help to determine an Investment Manager's ongoing role in implementing the investment strategy. If there are concerns, the Trustees may carry out a more in-depth review of a particular Investment Manager. Investment Managers will also attend Trustees meetings as requested.

The Investment Consultant has also carried out a review of how well ESG factors are incorporated into each Investment Manager's processes and the Trustees will re-assess progress on ESG issues periodically.

Fund manager remuneration is considered as part of the manager selection process. It is also monitored regularly with the help of the Investment Consultant to ensure it is in line with the Trustees' policies and with fee levels deemed by the Investment Consultant to be appropriate for the particular asset class and fund type.

## Selection / Deselection Criteria

The criteria by which the Trustees will select (or deselect) the Investment Managers include:

- **Parent** – Ownership of the business;
- **People** – Leadership/team managing the strategy and client service;
- **Product** – Key features of the investment and the role it performs in a portfolio;
- **Process** – Philosophy and approach to selecting underlying investments including operational risk management and systems;
- **Positioning** – Current and historical asset allocation of the fund;
- **Performance** – Past performance and track record;
- **Pricing** – The underlying cost structure of the strategy;
- **ESG** – Consistency and extent to which ESG analysis is incorporated into the process of selecting underlying investments.

# Investment Manager Arrangements and fee structure continued

An Investment Manager may be replaced, for example (but not exclusively), for one or more of the following:

- The Investment Manager fails to meet the performance objectives set out in Appendix II;
- The Trustees believe that the Investment Manager is not capable of achieving the performance objectives in the future;
- The Investment Manager fails to comply with this Statement.

## Investment Managers' fee structure

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The Investment Managers are remunerated by receiving a percentage of the Scheme's assets under management and, in some cases, through the application of a flat fee. It is felt that this method of remuneration provides appropriate incentives for the Investment Managers to target the agreed level of outperformance whilst adhering to the level of risk specified by the Trustees.

## Portfolio turnover

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The Trustees require the Investment Managers to report on actual portfolio turnover at least annually, including details of the costs associated with turnover, how turnover compares with the range that the Investment Manager expects and the reasons for any divergence.

## Investment Consultant's fee structure

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The Investment Consultant is remunerated for work completed on a fixed fee basis, a time-cost basis or via a project fee. It is felt that these methods of remuneration are appropriate because it enables the Investment Consultant to provide the necessary advice and information to facilitate the Trustees in undertaking their responsibilities.

# 07 Additional Voluntary Contribution arrangements

## Provision of AVCs

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The Scheme provided a facility for members to pay AVCs to enhance their benefits at retirement. The Trustees' objective was to provide vehicles that enabled members to generate suitable long-term returns, consistent with their reasonable expectations.

The investment funds were provided by Prudential Assurance.

The Trustees selected these vehicles as they were believed to meet the Trustees' objective of providing investment options that enabled AVC members to generate suitable long-term returns, consistent with their reasonable expectations.

Since the Scheme is now closed to future accrual, no new contributions can be made in respect of AVCs. However, members who paid additional voluntary contributions in the past retain investments in respect of those contributions.

## Review process

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The appointment of the AVC providers and the choice of AVC funds offered to members will be reviewed by the Trustees in accordance with their responsibilities, based on the result of the monitoring of performance and process. The Trustees will review the appointment of the AVC providers periodically in the light of their performance.

Where possible, performance of the AVC providers will be measured relative to the individual benchmarks and objectives for the funds offered and/or to other providers offering similar fund options as measured in industry AVC surveys.

The Trustees are aware that members' AVC funds are subject to the same risks faced by the Scheme's investments, such as inflation risk eroding real returns. In addition, AVC members face the risk that their investments will not meet their future expectations (for example, if they are planning to purchase an annuity at retirement), lack of transparency on how their fund is managed and also that their AVC fund may fall in value.

The Trustees consider that, in making a number of funds available, they provide members with sufficient options to meet their reasonable expectation and to mitigate the risks faced.

# 08 Compliance Statement

## Confirmation of advice

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Before a Statement of Investment Principles, as required by the Pensions Act 1995, is prepared or revised by the trustees of a pension scheme, they must have consulted with the principal employer and obtained and considered the written advice of a person who is reasonably believed by it to be qualified by his ability in and practical experience of financial matters and to have the appropriate knowledge and experience of the management of the investments of such schemes.

The Investment Consultant hereby confirms to the Trustees that they have the appropriate knowledge and experience to give the advice required by the Act.

## Signatures

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The Statement has been approved by the Trustees of the Sutcliffe Speakman Pension & Life Assurance Scheme and subsequently signed. For security reasons, signed copies of this statement are only available upon request.

## Trustees' declaration

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The Trustees confirm that this Statement of Investment Principles reflects the Investment Strategy they have decided to implement. The Trustees acknowledge that it is their responsibility, with guidance from the Advisers, to ensure the assets of the Scheme are invested in accordance with these Principles.

# Appendix I

## Investment Strategy & Structure

### Overall strategy

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The Trustees have adopted a strategy where assets are invested in liability matching assets along with return-seeking assets. The Trustees have identified the strategy detailed in appendix II as appropriate to meet the objectives of the Scheme.

### Liability matching assets

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The Scheme invests in leveraged LDI funds to provide a full hedge against the Scheme's interest rate and inflation sensitivities. As the LDI funds are leveraged, this means they are designed to provide greater exposure to interest rate and inflation movements in order to increase the degree of hedging.

The leveraged nature of some of these funds means that there is an expectation that additional collateral will be required to be paid into these funds from time to time (and any excess collateral repaid to the Trustees). Where any additional collateral payments are required it is the Trustees' intention that these will be met initially through disinvestments from the Scheme's cash assets held in the weekly dealt LGIM Sterling Liquidity Fund and, if the value of this Fund is exhausted, then subsequently through disinvestments from the Scheme's credit assets held in the weekly dealt LGIM Buy & Maintain Credit Fund.

### Hedging

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The strategy is designed to achieve liability hedging of:

- 100% of the interest rate risk, as a proportion of the Scheme's total liabilities, as assessed against the current Technical Provisions basis;
- 100% of the inflation risk, as a proportion of the Scheme's total liabilities, as assessed against the current Technical Provisions basis.

### Return-seeking assets

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In order to achieve the required rate of investment return with a lower level of expected volatility, the Trustees have decided to invest in low risk credit assets.

**Multi Asset Credit** – The Trustees have decided to invest in this asset class in order to diversify the Scheme's exposure to credit assets, mitigate the price impact of rising interest rates and to enhance returns by capturing yield premiums over investment grade corporate bonds.

**Buy & Maintain Credit** – The Trustees have decided to invest in this asset class in order to deliver a stable rate of return by investing in high quality credit assets, gain a degree of additional hedging due to interest rate exposure and to hold assets that help to match insurer's annuity pricing.

### Rebalancing

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The Trustees review the asset allocation on a periodic basis to ensure that the Scheme assets are allocated in a manner that is consistent with the objectives as detailed in this Statement.

There is no formal or automatic rebalancing back to the target, however, the Trustees will periodically (often quarterly) review the position and take action to rebalance if considered appropriate.

## Realising investments and cashflow

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The Trustees are aware of their responsibility to meet members' benefits as they fall due. This may involve disinvestment of assets from time to time.

Where assets need to be realised, the Trustees will consult with the Investment Consultant regarding the source and timing of disinvestments. The liquidity and trading costs of such disinvestments will also be taken into account. It is envisaged that disinvestments will be sourced primarily from the return-seeking assets held in the M&G Total Return Credit Investment Fund. However, the LGIM Sterling Liquidity Fund may also be utilised in certain cases for Scheme cashflow needs, particularly if there is significant excess cash beyond what is required for LDI collateral purposes.

The need to disinvest from assets can be mitigated to an extent by pension schemes investing in income share classes of certain funds, which pay out regular distributions to investors. The Trustees will consider utilising such share classes for the Scheme when available/applicable, in conjunction with advice from the Investment Consultant.

## De-risking

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The Trustees' long term intentions are for the Scheme to achieve buy-out within approximately 3 to 7 years. As such, the Trustees have recently taken steps to de-risk the Scheme by eliminating equity exposure from the investment strategy and by investing in lower risk credit assets, alongside LDI holdings (which hedge 100% of interest rate and inflation risk) and cash holdings.

The Trustees intention is to further reduce investment risk over time, as the funding position improves, and the investment strategy is expected to evolve towards a portfolio geared towards a buy-out transaction, which includes assets that help to further match insurer's annuity pricing.

## Insurance policies

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Additionally, there are a number of insurance policies held with Prudential, in the name of the Trustees, in respect of members of the Scheme. These policies were bought for members whose value of pension benefits were below £50,000 at retirement and was part of the Trustees' policy to control risk associated with running the Scheme.

# Appendix II

## Fund benchmarks, objectives & fees

The current investment strategy of the Scheme is summarised in the table below:

Asset class	Asset allocation (31 Dec 2020)	Expected return (above gilts pa)	Manager & Fund	Objective
LDI	35%	0.0%	Legal & General Matching Core Funds	Produce returns that reflect the movement in liabilities of pooled profile funds
Cash	6%	0.0%	Legal & General Sterling Liquidity Fund	7 Day LIBID
Credit	12%	1.0%	Legal & General Buy & Maintain Credit Fund	To provide a stable source of returns above gilts whilst providing some matching characteristics
Credit	47%	1.9%	M&G Total Return Credit Investment Fund	1 month LIBOR + 3% to 5% (gross of fees) over the medium term
100%		1.0%		

### Notes:

- **AMC** – Annual Management Charge (figures shown as at 31 December 2020); LDI figures include the XPS negotiated fee saving from January 2021.
- **TER** – Total Expense Ratio (figures shown as at 30 September 2020, the latest available, and are subject to change over time).
- **Expected return** – Best estimates for long-term returns (as at 31 December 2020).
- **Trading costs** – Subject to change over time. These costs are taken into account by the Trustees when undertaking any strategic changes. The Investment Consultant will confirm any trading spreads and costs associated with transferring assets as part of their formal advice.



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