KUONI TRAVEL LIMITED RETIREMENT BENEFITS PLAN (1971)

STATEMENT OF INVESTMENT PRINCIPLES

AUGUST 2021

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1 INTRODUCTION

This Statement of Investment Principles ("the Statement") has been prepared by the Trustees of the Kuoni Travel Limited Retirement Benefits Plan (1971) ("the Plan") in accordance with Section 35 of the Pensions Act 1995, as amended, and its attendant Regulations.

The Statement outlines the principles governing the investment policy of the Plan and the activities undertaken by the Trustees to ensure the effective implementation of these principles.

In preparing the Statement, the Trustees have:

- obtained and considered written advice from a suitably qualified individual, employed by their investment adviser, Mercer Limited ("Mercer"), whom they believe to have a degree of knowledge and experience that is appropriate for the management of their investments; and
- consulted with the Sponsoring Employer, although they affirm that no aspect of their strategy is restricted by any requirement to obtain the consent of the Sponsoring Employer.

The advice and the consultation process considered the suitability of the Trustees' investment policy for the Plan.

The Trustees will review the Statement formally at least every three years to coincide with the triennial Actuarial Valuation or other actuarial advice relating to the statutory funding requirements. Furthermore, the Trustees will review the Statement without delay after any significant change in investment policy. Any changes made to the Statement will be based on written advice from a suitably qualified individual and will follow consultation with the Sponsoring Employer.

2 INVESTMENT OBJECTIVES

The Trustees' primary investment objective for the Plan is to achieve an overall rate of return that is sufficient to ensure that assets are available to meet all liabilities as and when they fall due. In doing so, the Trustees also aim to maximise returns at an acceptable level of risk taking into consideration the circumstances of the Plan.

The Trustees believe that their investment objectives and the resultant investment strategy are consistent with the actuarial valuation methodology and assumptions used by the Scheme Actuary.

3 INVESTMENT RESPONSIBILITIES

3.1 TRUSTEES' DUTIES AND RESPONSIBILITIES

The Trustees are responsible for setting the investment objectives and determining the strategy to achieve the objectives. They carry out their duties and fulfil their responsibilities as a single body.

The duties and responsibilities of the Trustees include, but are not limited to, the following tasks and activities:

- The regular approval of the content of the Statement.
- The appointment and review of the investment managers and investment adviser.
- The assessment and review of the performance of each investment manager.
- The setting and review of the investment parameters within which the investment managers can operate.
- The assessment of the risks assumed by the Plan at a total Plan level as well as on a manager by manager basis.
- The approval and review of the asset allocation benchmark for the Plan.
- The compliance of the investment arrangements with the principles set out in the Statement.

3.2 INVESTMENT ADVISER'S DUTIES AND RESPONSIBILITIES

The Trustees have appointed Mercer as the investment adviser to the Plan. Mercer provides advice as and when the Trustees require it, as well as raising any investment-related issues, of which it believes the Trustees should be aware. Matters on which the Mercer expects to provide advice to the Trustees include the following:

- Setting of investment objectives.
- Determining investment strategy and asset allocation.
- Determining an appropriate investment structure.
- Advising on appropriate funds.
- Setting cashflow management policies (see Appendix 2).

The Trustees may seek advice from Mercer with regard to both strategic and tactical investment decisions (see Section 4 - Investment Strategy); however, they recognise that they retain responsibility for all such decisions, including those that concern investments and disinvestments relating to cash flows (see Appendix 2). Mercer may be proactive in advising the Trustees regarding tactical investment decisions and/or meeting cashflow needs; however, there is no responsibility placed on Mercer to be proactive in all circumstances.

Mercer monitors the performance of the Plan's investment managers against their benchmarks.

Any services provided by Mercer will be remunerated primarily on a time-cost basis, other than performance reporting which is provided for a pre-agreed fee.

In particular, Mercer does not receive commission or any other payments in respect of the Plan that might affect the impartiality of their advice, and as noted below, any discounts negotiated by Mercer with the underlying managers and these discounts are passed on in full to the Plan.

The Trustees are satisfied that this is a reasonable adviser remuneration structure for the Plan.

Mercer is authorised and regulated by the Financial Conduct Authority ("FCA").

3.3 ARRANGEMENT WITH INVESTMENT MANAGERS

The Trustees are long term investors and do not look to change the investment arrangements on a frequent basis. After considering appropriate investment advice, the Trustees have decided to invest the Plan assets through the Mobius Life platform (the “Platform”).

The underlying managers and funds invested in by the Plan are determined by the Trustees using a written instruction to Mobius who will arrange for any changes to the investment arrangements to be implemented.

The Trustees look to their investment adviser for their forward looking assessment of an investment manager’s ability to deliver upon its stated objectives over a full market cycle. This view will be based on the adviser’s assessment of the investment manager’s idea generation, portfolio construction, implementation and business management, in relation to the particular investment that the Plan invests in. The investment adviser's manager research ratings assist with due diligence and questioning managers during presentations to the Trustees. These ratings are used in decisions around selection, retention and removal of manager appointments.

If the investment objective for a particular investment manager changes, the Trustees will review the Plan’s appointment to ensure it remains appropriate and consistent with the Trustees’ wider investment objectives. As the Plan invests in pooled investment vehicles, they accept that they have no ability to specify the risk profile and return targets of the manager, but believe appropriate mandates can be selected to align with the overall investment strategy.

The underlying investment managers and pooled funds invested in by the Plan are determined by the Trustees using a written instruction to the individual investment managers. The pooled funds held are open-ended vehicles and the Trustees expect to retain them unless:

- There is a strategic change to the overall investment strategy that no longer requires exposure to that asset class or manager; or
- The investment manager appointed has been reviewed and the Trustees decided to terminate the mandate

The details of each investment manager’s mandate are set out in Appendix 3. In particular, the investment managers are responsible for all decisions concerning the selection and de-selection of the individual securities within the portfolios they manage.

In the case of multi-asset mandates, the investment managers are responsible for all decisions concerning the allocation to individual asset classes and changes in the allocations to individual asset classes.

All of the investment managers engaged by the Trustees are authorised and regulated by the FCA.

The Platform and the investment managers are remunerated by ad valorem charges based on the value of the assets that they manage on behalf of the Plan. None of the investment managers, currently appointed by the Plan, receive a performance based fee. The Trustees believe that this is a reasonable basis for remuneration.

The Trustees consider that the method of remunerating investment managers to be consistent with incentivising them to make decisions based on assessments of medium to long-term financial and non-financial performance of an issuer of debt or equity. By encouraging a medium to long-term view, the Trustees believe it will in turn encourage the investment managers to engage with issuers of debt or equity in order to improve their performance in the medium to long-term.

The Trustees accept that they cannot influence the charging structure of the Platform or investment managers with which the Plan invests, but are satisfied that the ad-valorem charges for the different underlying funds are clear and are consistent with each pooled fund’s stated characteristics.

The Trustees are therefore satisfied that this the most appropriate basis for remunerating the Platform and the underlying investment managers and is consistent with the Trustees policies as set out in this Statement.

3.4 SUMMARY OF RESPONSIBILITIES

A summary of the responsibilities of all relevant parties, including the Scheme Actuary and the Plan administrators, in so far as they relate to the Plan's investments, is set out at Appendix 4.

4 INVESTMENT STRATEGY

4.1 SETTING INVESTMENT STRATEGY

The Trustees have determined their investment strategy after considering the Plan's liability profile and their own appetite for risk, the Sponsoring Employer's appetite for risk, and the strength of the Sponsoring Employer's covenant. The Trustees have also received written advice from their Investment Adviser. The current investment strategy was implemented in December 2020.

The basis of the Trustees' strategy is to divide the Plan's assets between a "Growth" portfolio, comprising assets such as passive equities, listed infrastructure and diversified growth funds and a "Stabilising" portfolio, comprising assets such as multi-asset credit and bonds. The Growth/Stabilising allocation is set with regard to the overall required return objective of the Plan's assets, which is determined by the funding objective and current funding level, and the desire to mitigate risk through hedging of the Plan's interest rate and inflation risks, taking consideration of the instruments being used to hedge these risks.

The Trustees have established a strategic benchmark allocation to each asset class, which is set out in Appendix 1.

The Trustees recognise the benefits of diversification across growth asset classes, as well as within them, in reducing the risk that results from investing in any one particular market. Where they consider it advisable to do so, the Trustees invest with investment managers to manage the Plan's growth asset exposure where it would not be practical (or appropriate) for them to do so themselves.

The Trustees have decided on control ranges around their strategic benchmark asset allocation. If any of the assets move outside of their control range, the Trustees will decide on a course of action which may involve rebalancing the portfolio back to within the limits, or taking no action. Any investment or disinvestment will be used to bring the Plan's actual asset allocation back towards the strategic benchmark assets allocation.

4.2 INVESTMENT DECISIONS

The Trustees distinguish between three types of investment decision: strategic, tactical and security-level.

Strategic Investment Decisions

These decisions are long-term in nature and are driven by an understanding of the objectives, needs and liabilities of the Plan.

The Trustees take all such decisions themselves. They do so after receiving written advice from their investment adviser and consulting with the Sponsoring Employer. Examples of such decisions and of tasks relating to the implementation of these decisions include the following:

- Setting investment objectives.
- Determining the split between the growth and the matching portfolios.
- Determining the allocation to asset classes within the growth and matching portfolios.
- Determining the Plan benchmark.
- Reviewing the investment objectives and strategic asset allocation.

Tactical Investment Decisions

These decisions are short-term and based on expectations of near-term market movements. Such decisions may involve deviating temporarily from the strategic asset allocation and may require the timing of entry into, or exit from, an investment market or asset class.

These decisions are the responsibility of the Trustees. However, where such decisions are made within a pooled fund, they are the responsibility of the investment manager of the fund.

Stock Selection Decisions

All such decisions are the responsibility of the investment managers of the pooled funds in which the Plan is invested.

4.3 TYPES OF INVESTMENTS TO BE HELD

The Plan's assets are invested wholly via pooled vehicles.

The Trustees are permitted to invest across a wide range of asset classes, including (but not limited to) the following:

- UK and overseas equities
- UK and overseas government bonds, fixed and inflation-linked
- UK and overseas corporate bonds
- Convertible bonds
- Property
- Commodities
- Hedge Funds
- Private equity
- High yield bonds
- Emerging market debt
- Diversified growth
- Liability driven investment products
- Cash

The use of derivatives is as permitted by the guidelines that apply to the pooled funds.

4.4 FINANCIALLY MATERIAL CONSIDERATIONS

The Trustees understand that they must aim to consider all financially relevant factors that have the ability to impact the financial performance of the Plan's investments over the appropriate time horizon. This includes, but is not limited to, environmental, social and governance (ESG) factors.

The Trustees recognise that ESG factors, such as climate change, can influence the investment performance of the Plan's portfolio and it is therefore in members' and the Plan's best interests that these factors are taken into account within the investment process; and that ESG risks are identified and avoided or mitigated, as best as possible.

The Trustees believe that investing with a manager who approaches investments in a responsible way, and takes account of ESG-related risks, will lead to better risk adjusted performance results as omitting these risks in investment analysis could skew the results and underestimate the level of overall risk being taken. The Trustees are aware of the Platform and its investment managers' approaches to ESG factors with respect to their selection of investments and is satisfied that a responsible approach, which is consistent with the long-term financial interests of the Plan and its members, is undertaken.

The Trustees will also consider the investment advisers assessment of how each investment manager embeds ESG into its investment process and how the manager's responsible investment philosophy aligns with the Trustees' responsible investment policy. This includes the investment managers' policy on voting and engagement. The Trustees will use this assessment in decisions around selection, retention and realisation of manager appointments.

As noted earlier, the Plan's assets are invested in pooled funds. The Trustees accept the fact that they have very limited ability to influence the ESG policies and practices of the companies in which their managers invest. The Trustees will therefore rely on the policies, and judgement of their investment manager. The Trustees will periodically review the policies of the Platform and its investment managers.

4.5 NON-FINANCIAL CONSIDERATIONS

The Trustees only consider factors that are expected to have a financial impact on the Plan's investments. Non-financial considerations, such as ethical views, will be left to the discretion of the investment manager. The views of the members of the Plan will not be sought.

4.6 CORPORATE GOVERNANCE AND VOTING POLICY

The Trustees have concluded that the decision on how to exercise voting rights should be left with their investment managers, who will exercise these rights in accordance with their respective published corporate governance policies. These policies, which are provided to the Trustees from time to time, take into account the financial interests of shareholders and should be for the Plan's benefit.

Where the Trustees are specifically invited to vote on a matter relating to corporate policy, the Trustees will exercise their right in accordance with what they believe to be the best interests of the majority of the Plan's membership.

4.7 STEWARDSHIP

The Trustees have given the appointed investment managers full discretion when undertaking engagement activities in accordance with their own corporate governance policies and current best practice, including the UK Corporate Governance Code and UK Stewardship Code. The Trustees will review the investment managers' policies and engagement activities (where applicable) on an annual basis.

5 RISK

The Trustees are aware, and seek to take account of a number of risks in relation to the Plan’s investments, including the following:

Under the Pensions Act 2004, the Trustees are required to state their policy regarding the ways in which risks are to be measured and managed. These are set out below.

Solvency Risk and Mismatching Risk

- These are measured through a qualitative and quantitative assessment of the expected development of the assets relative to the liabilities.
- These are managed by setting a Plan-specific strategic asset allocation with an appropriate level of risk.

Manager Risk

- This is assessed as the expected deviation of the prospective risk and return, as set out in the managers’ objectives, relative to the investment policy.
- It is measured by monitoring the actual deviation of returns relative to the objective and factors supporting the managers’ investment process.

Liquidity Risk

- This is monitored according to the level of cashflows required by the Plan over a specified period.
- It is managed by holding an appropriate amount of readily realisable investments. The Plan’s assets are invested in pooled funds which are readily realisable.

Political Risk

- This is measured by the level of concentration in any one market leading to the risk of adverse influence on investment values arising from political intervention.
- It is managed by regular reviews of the investments and through investing in funds which give a wide degree of diversification.

Environmental, Social and Governance Risk

- This is the risk that Environmental, Social or Corporate Governance concerns, including climate change, have a financially material impact on the return of the Plan’s assets.
- The Trustees manage this risk by investing in well-respected investment managers where ESG principles are appropriately included in the investment decision-making process.
- The Trustees are aware that Responsible Investing is one of the core beliefs of the investment managers and the investment adviser. As a result, part of the rating process of the investment adviser and decision making process of the investment managers in relation to the underlying securities held is based on its financial stewardship and how well the investment managers integrate governance and sustainability into its investment process.

Sponsor Risk

- This is assessed as the level of ability and degree of willingness of the sponsor to support the continuation of the Plan and to make good any current or future deficit.
- It is managed by assessing the interaction between the Plan and the sponsor’s business, as measured by a number of factors, including the creditworthiness of the sponsor and the size of the pension liability relative to

the sponsor. Regular updates on employer covenant are provided to the Trustees by senior staff of the Sponsoring Employer.

Legislative Risk

- This is the risk that legislative changes will require action from the Trustees so as to comply with any such changes in legislation.
- The Trustees acknowledge that this risk is unavoidable but will seek to address any required changes so as to comply with changes in legislation.

Credit Risk

- This is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation.
- The Trustees acknowledge that the assessment of credit risk on individual debt instruments is delegated to the investment manager. The Trustees will however ensure that they are comfortable with the amount of risk that the Plan's investment manager takes.

Market Risk

- This is the risk the fair value of future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk comprises of the following three types of risk:

Currency Risk

- This is the risk that occurs when the price of one currency moves relative to another (reference) currency. In the context of a UK pension scheme, the Plan may be invested in overseas stocks or assets, which are either directly or indirectly linked to a currency other than Sterling. There is a risk that the price of that overseas currency will move in such a way that devalues that currency relative to Sterling, thus negatively impacting the overall investment return.
- For currency hedged funds, the Trustees acknowledge that currency risk related to overseas investments is hedged appropriately by the underlying investment managers.
- For funds where the currency risk is separately managed by the manager, the Trustees acknowledge that currency risk is delegated to the underlying investment managers where the manager is responsible for the decision of whether or not to hedge.

Interest Rate and Inflation Risk

- This is the risk that an investment's value will change due to a change in the level of interest rates or market implied inflation. This affects debt instruments more directly than growth instruments.
- The Trustees acknowledge that the interest rate and inflation risk related to individual debt instruments, and particularly liability driven investment (LDI) instruments, is managed by the underlying investment managers through a combination of strategies, such as diversification, duration and yield curve management, and hedging via swaps, particularly where LDI is involved.

Other Price Risk

- This is the risk that principally arises in relation to the return seeking portfolio, which invests in equities, equities in pooled funds, equity futures, hedge funds, private equity and property.
- The Trustees acknowledge that a Plan can manage its exposure to price risk by investing in a diverse portfolio across various markets.

Liability Driven Investment

- During 2020, the Trustees implemented a Liability Driven Investment ("LDI") solution with the purpose of improving the degree to which the Plan's assets match the interest rate and inflation sensitivities of the Plan's liabilities. In doing so, the Trustees expect the Plan's funding position to exhibit less volatility. Further, as the LDI solution will deploy leverage, the Plan is able to do so without reducing its allocation to growth assets (e.g. equities).

- The use of leverage, within the LDI solution, exposes the Plan to some additional risks:
    - **Counterparty risk** arises from the possibility that a counterparty to a derivative contract will default on its contractual obligations.
    - **Collateral adequacy risk** which requires the Trustees to make available assets to meet derivative obligations in response to changes in interest rates and inflation expectations (typically arises when interest rates rise and inflation falls). The process for doing so is detailed in Appendix 2.
    - **Roll risk** which can arises if the investment manager forgets to roll a derivative contract or liquidity may become poor at future roll dates and in extreme circumstances, they may not be able to roll the position.
- The Trustees delegate, to their LDI manager, the responsibility to monitor and manage these risks on a day-to-day basis.

Whilst the Trustees identify and manage a large proportion of the risks faced by the Plan, it is not possible to completely eradicate a number of the above risks.

6 MONITORING OF INVESTMENT ADVISER AND MANAGERS

6.1 INVESTMENT ADVISER

The Trustees continually assess and review the performance of their adviser in a qualitative way.

6.2 INVESTMENT MANAGERS

The investment managers are appointed by the Trustees based on their capabilities and, therefore, their perceived likelihood of achieving the expected return and desired risk characteristics. The Trustees utilises the investment advisers' forward-looking manager research ratings in decisions around the selection, retention and realisation of manager appointments. These ratings are based on the investment advisers' assessment of the investment manager's idea generation, portfolio construction, implementation and business management.

If the investment objective for a particular investment manager mandate changes, the Trustees will review the appointment to ensure that it remains appropriate and consistent with the wider Trustees' investment objectives.

Some mandates are actively managed and the investment managers are incentivised through performance targets (an appointment will be reviewed following periods of sustained underperformance). The Trustees will review the appropriateness of using actively managed funds as part of the wider monitoring of the Plan's investment managers.

All of the Plan's investments are made through pooled investment vehicles using Mobius Life platform, and as such the Trustees accept that it has no ability to specify the risk profile and return targets of the manager, but appropriate mandates can be selected to align with the overall investment strategy.

The Trustees receive quarterly monitoring reports on the performance of the underlying investment managers from their investment adviser, which presents performance information over 3 months, 1 year and 3 years. The reports show the absolute performance and performance against the managers stated benchmark (over the relevant time period) on a net of fees basis. It also provides returns of market indices so that these can also be used to help inform the assessment of the underlying managers' performance.

The reporting reviews the performance of the Plan's individual funds against their benchmarks and of the Plan's assets in aggregate against the Plan's strategic benchmark. The Trustees' focus is primarily on long term performance but short term performance is also reviewed. The Trustees may review a manager's appointment if:

- There are sustained periods of underperformance;
- There is a change in the portfolio manager;
- There is a change in the underlying objectives of the investment manager;
- There is a significant change to Mercer's rating of the manager.

If a manager is not meeting performance objectives, or their investment objectives for the mandate have changed, the Trustees may initially ask the manager to review their fees instead of terminating the appointment.

6.3 PORTFOLIO TURNOVER COSTS

Portfolio turnover costs refer to those incurred due to the buying, selling, lending or borrowing of investments.

Given that the Plan invests in a range of pooled investment vehicles, some of which invest across a wide range of asset classes, the Trustees do not have an overall portfolio turnover target.

The Trustees receive MiFID II reporting from the investment managers, which provides this information, but does not actively monitor portfolio turnover costs. This position is kept under review but the Trustees note that the performance monitoring it receives is net of all changes, including such costs.

7 CODE OF BEST PRACTICE

The Trustees note that in March 2017, the Pensions Regulator released ‘Investment Guidance for Defined Benefit Pension Schemes’.

The Trustees have received training in relation to this guidance and are satisfied that the investment approach adopted by the Plan is consistent with the guidance so far as it is appropriate to the Plan’s circumstances.

The Trustees meet with its investment adviser on a regular basis, monitoring developments both in relation to the Plan’s circumstances and in relation to evolving guidance, and will revise the Plan’s investment approach if considered appropriate.

8 COMPLIANCE

The Plan's Statement of Investment Principles and annual report and accounts are available to members on request.

A copy of the Plan's Statement plus Appendices has been shared with the Sponsoring Employer and third party advisers and the Trustees has made a copy available online.

This Statement of Investment Principles, taken as a whole with the Appendices, supersedes all others and was approved by the Trustees on ....

Signed on behalf of the Trustees by	....	....
On	....	....
Name	....	....
Position	....	....

APPENDIX 1: ASSET ALLOCATION BENCHMARK

The Plan's assets are invested with Legal & General Investment Management; the strategic asset allocation benchmark is set out below:

Fund	Allocation
Growth Assets	**55.0%**
UK Equities	10.0%
Overseas Equities (Hedged)	20.0%
Emerging Market Equities	5.0%
Infrastructure	10.0%
Diversified Growth Funds	10.0%
Matching Assets	**45.0%**
Multi-Asset Credit (Defensive)	12.5%
Real LDI	20.0%
Nominal LDI	12.5%
Total	**100.0%**

Note: The Plan has a small allocation to Private Equity that is held outside of the above strategic benchmark.

The policy for rebalancing and investment / disinvestment of cashflows is set out in Appendix 2.

Appendix 3 provides information about the funds in which the assets are invested.

APPENDIX 2: CASHFLOW AND REBALANCING POLICY

The Trustees have instructed Mobius to monitor the Plan’s asset allocation relative to the table below on a quarterly basis. If any of the Plan’s holdings are outside the stated control ranges, Mobius will instruct trades so as to move the actual allocation to the ‘Rebalanced Asset Allocation’ details below:

Rebalanced Assets / Fund	Total Scheme Target Allocation (%)	Rebalanced Asset Allocation (%)	Control Range of Rebalanced Assets(%)	
			Lower	Upper
BMO LDI Real Dynamic LDI Fund	12.5	-	-	-
BMO LDI Nominal Dynamic LDI Fund	20.0	-	-	-
LGIM Life MB FTSE Developed Core Infrastructure Index Fund	10.0	15.0	12.50	17.50
LGIM Life N UK Equity Index Fund	10.0	15.0	12.50	17.50
LGIM Life HN World Emerging Markets Equity Index Fund	5.0	7.0	4.50	9.50
LGIM Life KX World (ex-UK) Equity Index Fund — GBP Currency Hedged	20.0	30.0	27.50	32.50
LGIM Life MAAA Diversified Fund	10.0	15.0	12.50	17.50
M&G Total Return Credit Investment Fund	12.5	18.0	15.50	20.50
Total	100.0	100.0	-	-

Note: The LDI holdings are excluded from the rebalancing process to avoid inadvertently adjusting the Plan’s hedging levels.

Following the introduction of rebalancing ranges, the cashflow needs of the Plan’s will be sourced by Mobius in such a way that the assets move towards the rebalanced asset allocation detailed above.

With no additional contributions expected to be received from the Sponsoring Employer, the Trustees expect a shortfall to be regularly calculated by the administrator. As such, the Trustees have set up a standing instruction whereby a fixed amount (£38k) is redeem each month, and transferred to the Trustee Bank Account. If additional monies are required (e.g. due to a Transfer Value), a separate disinvestment instruction will be submitted to Mobius, by the administrator, with the monies sourced in line with process outlined previously.

LDI collateral management

Should gilt yields rise to such a degree that additional monies needed to be invested into the LDI solution to reduce the level of leverage used (known as a recapitalisation event), the Trustees have instructed Mobius to redeem assets from the most overweight fund(s) at that point of time.

If gilt yields fell to such a degree that monies were released from the LDI solution to increase the level of leverage employed (known as a re-leveraging event) the Trustees have agreed that it would be invested in the most underweight fund(s) at that point of time.

APPENDIX 3: INVESTMENT MANAGER INFORMATION

The tables below show the details of the mandates with each manager.

GROWTH ASSETS

Manager / Fund	Benchmark	Objective	Dealing Frequency	SORP / IFRS Class
Growth – Multi Asset				
LGIM UK Equity Index Fund	FTSE All Share Index	Track the benchmark to within +/- 0.25% p.a. for two years in three	Weekly	Level 2
LGIM World (ex UK) Index – GBP Hedged Fund	FTSE World (ex UK) Index – GBP Hedged	Track the benchmark to within +/- 0.5% p.a. for two years in three	Weekly	Level 2
LGIM Infrastructure Index Fund	MFGAM Core Infrastructure Index	To produce a return broadly comparable to the benchmark (less withholding tax where applicable).	Weekly	Level 2
LGIM Diversified Fund	FTSE Developed World Index - 50% GBP Hedged	To provide long-term investment growth through exposure to a diversified range of asset classes.	Weekly	Level 2
LGIM World Emerging Markets Equity Index Fund	FTSE AW All Emerging Markets Index	Track the benchmark to within +/- 1.5% p.a. for two years in three	Weekly	Level 2

STABILISING ASSETS

Manager / Fund	Benchmark	Objective	Dealing Frequency	SORP / IFRS Class
Active				
M&G Total Return Credit Fund	Cash (1 month GBP LIBOR)	A return of 1 month LIBOR plus 3% to 5% p.a. gross of fees over the medium term	Daily	Level 2
BMO Real Dynamic LDI Fund	The liability benchmark is not scheme specific but represents the liability profile of a “typical” UK defined benefit pension scheme	To provide liability hedging by offering interest rate and inflation protection which replicates the liability profile of a typical UK defined benefit pension scheme	Daily	Level 2
BMO Nominal Dynamic LDI Fund	The liability benchmark is not scheme specific but represents the liability profile of a “typical” UK defined benefit pension scheme	To provide liability hedging by offering interest rate and inflation protection which replicates the liability profile of a typical UK defined benefit pension scheme	Daily	Level 2

The assets for the underlying managers are accessed via a platform hosted by Mobius Life Limited.

For avoidance of doubt, this Statement will not be updated solely in response to a replacement of one of the underlying investment managers.

APPENDIX 4: RESPONSIBILITIES OF PARTIES

TRUSTEES

The Trustees' responsibilities include the following:

- Reviewing at least triennially and more frequently if necessary, the content of this Statement in consultation with the Investment Adviser and modifying it if deemed appropriate.
- Reviewing the investment strategy following the results of each actuarial review, in consultation with the Investment Adviser and Scheme Actuary.
- Appointing the Investment Managers and custodian (if required).
- Assessing the quality of the performance and processes of the Investment Managers by means of regular reviews of investment returns and other relevant information, in consultation with the Investment Adviser.
- Consulting with the sponsoring employer regarding any proposed amendments to this Statement.
- Monitoring compliance of the investment arrangements with this Statement on a continuing basis.

INVESTMENT ADVISER

The Investment Adviser's responsibilities include the following:

- Participating with the Trustees in reviews of this Statement of Investment Principles.
- Production of independent performance monitoring reports.
- Advising the Trustees, at their request, on the following matters:
  - Through consultation with the Scheme Actuary, how any changes within the Plan's benefits, membership, and funding position may affect the manner in which the assets should be invested.
  - How any changes in the investment managers' organisations could affect the interests of the Plan.
  - How any changes in the investment environment could present either opportunities or problems for the Plan.
- Undertaking project work, as requested, including:
  - Reviews of asset allocation policy.
  - Research into and reviews of Investment Managers.
- Advising on the selection of new managers and/or custodians.
- Advising on the investment and disinvestment of cashflows.

PLATFORM PROVIDER

The Platform Provider's responsibilities include the following:

- Ensuring that contributions are invested/disinvested in accordance with the Trustees' instructions, and that the asset allocation remains within the guideline range.
- Providing the Trustees, on a monthly basis (or as frequently as agreed) with a valuation of assets and appropriate management information and performance reporting on a quarterly basis.

INVESTMENT MANAGERS

As noted in this statement, the Trustees have appointed their investment managers upon the advice of their investment adviser.

The investment managers' responsibilities include the following:

- Informing the Trustees of any changes in the internal performance objectives and guidelines of any pooled fund used by the Plan as and when they occur.

- Having regard to the need for diversification of investments, so far as appropriate for the particular mandate, and to the suitability of investments.

SCHEME ACTUARY

The Scheme Actuary's responsibilities include the following:

- Liaising with the Investment Adviser regarding the suitability of the Plan's investment strategy given the financial characteristics of the Plan.
- Assessing the funding position of the Plan and advising on the appropriate response to any shortfall.
- Performing the triennial (or more frequent, as required) valuations and advising on the appropriate contribution levels.

ADMINISTRATOR

The Administrator's responsibilities include the following:

- Ensuring there is sufficient cash available to meet benefit payments as and when they fall due.
- Paying benefits and making transfer payments.
- Investing contributions not required to meet benefit payments with the Investment Managers according to the Trustees' instructions.