

## **The Accalon Limited Pension Scheme**

### **Statement of Investment Beliefs**

#### **Purpose of this Statement**

This statement has been prepared by the Trustee of The Accalon Limited Pension Scheme (the “Scheme”). This statement sets out the beliefs governing the Trustee’s decisions to invest the assets of the Scheme.

The Scheme’s investment strategy is derived from the Trustee’s investment objectives. The objectives have been taken into account at all stages of planning, implementation and monitoring of the investment strategy.

Details on the Scheme’s investment arrangements are set out in the Investment Implementation Document (“IID”).

#### **Investment objectives**

The Trustee invests the assets of the Scheme with the aim of ensuring that all members’ current and future benefits can be paid. The Scheme’s funding position will be reviewed on an ongoing basis to assess the position relative to the funding target and whether the investment arrangements remain appropriate to the Scheme’s circumstances. The Scheme’s funding target is specified in the Statement of Funding Principles.

The Scheme’s present investment objective is to achieve a return of Gilts + 1.1% per annum.

#### **Investment strategy**

The Trustee takes a holistic approach to considering and managing risks when formulating the Scheme’s investment strategy.

The Scheme’s investment strategy was derived following careful consideration of the factors set out in Appendix A. The considerations include the nature and duration of the Scheme’s liabilities, the risks of investing in the various asset classes, the implications of the strategy (under various scenarios) for the level of employer contributions required to fund the Scheme, and also the strength of the sponsoring company’s covenant. The Trustee considered the merits of a range of asset classes.

The Trustee recognises that the investment strategy is subject to risk, in particular the risk of a mismatch between the performance of the assets and the calculated value of the liabilities. This risk is monitored by regularly assessing the funding position and the characteristics of the assets and liabilities. The risk is managed by investing in assets which are expected to perform in excess of the liabilities over the long term, and also by investing in a suitably diversified portfolio of assets with the aim of minimising (as far as possible) volatility relative to the liabilities.

The assets of the Scheme consist predominantly of investments which are traded on regulated markets.

## Investment Management Arrangements

The Trustee has appointed Mobius Life as the platform provider. The Trustee then selects the underlying investment funds. Both Mobius Life and the investment managers of the investment funds are regulated under the Financial Services and Markets Act 2000.

All decisions about the day-to-day management of the assets have been delegated to the investment managers. The delegation includes decisions about:

- Selection, retention and realisation of investments including taking into account all financially material considerations in making these decisions;
- The exercise of rights (including voting rights) attaching to the investments.
- Undertaking engagement activities with investee companies and other stakeholders, where appropriate.

The Trustee takes investment managers' policies into account when selecting and monitoring managers. The Trustee also takes into account the performance targets the investment managers are evaluated on. The investment managers are expected to exercise their powers of investment with a view to giving effect to the beliefs contained within this statement, so far as reasonably practicable.

The investment managers' remuneration is based upon a percentage value of the assets under management.

As the Scheme's assets are invested in pooled vehicles, the custody of the holdings is arranged by the investment manager.

## Investment Manager Monitoring and Engagement

Below is a summary of the areas covered and how the Trustee seeks to engage on these matters with investment managers.

Areas for engagement	Method for monitoring and engagement	Circumstances for additional monitoring and engagement
Performance, Strategy and Risk	<ul style="list-style-type: none"><li>• The Trustee receives a quarterly performance report from the platform provider which details information on the underlying investments' performance, strategy and market data, which are considered at the relevant Trustee meeting.</li></ul>	<ul style="list-style-type: none"><li>• There are significant changes made to the investment strategy.</li><li>• Underperformance vs the performance objective over the period that this objective applies.</li></ul>

Environmental, Social, Corporate Governance factors and the exercising of rights	<ul style="list-style-type: none"> <li>• The Trustee receives information from its investment advisers and/or platform provider on the investment managers' approaches to engagement.</li> </ul>	<ul style="list-style-type: none"> <li>• The manager has not acted in accordance with their policies and frameworks.</li> <li>• The manager's policies are not in line with the Trustee's policies in this area.</li> </ul>
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Through the engagement described above, the Trustee will work with their investment advisors and/or managers to improve their alignment with the above policies. Where sufficient improvement is not observed, the Trustee will review the relevant investment manager's appointment and will consider terminating the arrangement.

### **Employer-related investments**

The policy of the Trustee is not to hold any employer-related investments as defined in the Pensions Act 1995 and the Occupational Pension Schemes (Investment) Regulations 2005 except where the Scheme invests in collective investment schemes that may hold employer-related investments. In this case, the total exposure to employer-related investments will not exceed 5% of the Scheme's total value. The Trustee will monitor this on an ongoing basis to ensure compliance.

### **Direct investments**

Direct investments, as defined by the Pensions Act 1995, are products purchased without delegation to an investment manager through a written contract. When selecting and reviewing any direct investments, the Trustee will obtain appropriate written advice from their investment advisers.

### **Governance**

The Trustee of the Scheme makes all major strategic decisions including, but not limited to, the Scheme's asset allocation and the appointment and termination of investment managers.

When making such decisions, and when appropriate, the Trustee takes proper written advice. The Trustee's investment advisers, Isio Group Limited, are qualified by their ability in and practical experience of financial matters and have the appropriate knowledge and experience. The investment adviser's remuneration may be a fixed fee or based on time worked, as negotiated by the Trustee in the interest of obtaining best value for the Scheme.

### **Members' views and non-financial factors**

In setting and implementing the Scheme's investment strategy the Trustee does not explicitly take into account the views of the Scheme members and beneficiaries in relation to ethical considerations, social and environment impact, or present and future quality of life matters (defined as "non-financial factors").

## **Compliance**

This Statement has been prepared in compliance with the Pensions Act 1995, the Pensions Act 2004, and the Occupational Pension Schemes (Investment) Regulations 2005. Before preparing or subsequently revising this Statement, the Trustee consulted the sponsoring company and took appropriate written advice. The Statement is reviewed at least every three years, and without delay after any significant change in the investment arrangements.

Stuart Evans  
**Name**

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**Signed**

8 July 2022  
**Date**

## Appendix A – Risks, Financially Material Considerations and Non-Financial matters

A non-exhaustive list of risks and financially material considerations that the Trustee has considered and sought to manage is shown below.

The Trustee adopts an integrated risk management approach. The three key risks associated within this framework and how they are managed are stated below:

<b>Risks</b>	<b>Definition</b>	<b>Policy</b>
Investment	The risk that the Scheme's position deteriorates due to the assets underperforming.	<ul style="list-style-type: none"><li>• Selecting an investment objective that is achievable and is consistent with the Scheme's funding basis and the sponsoring company's covenant strength.</li><li>• Investing in a diversified portfolio of assets.</li></ul>
Funding	The extent to which there are insufficient Scheme assets available to cover ongoing and future liability cash flows.	<ul style="list-style-type: none"><li>• Funding risk is considered as part of the investment strategy review and the actuarial valuation.</li><li>• The Trustee will agree an appropriate basis in conjunction with the investment strategy to ensure an appropriate journey plan is agreed to manage funding risk over time.</li></ul>
Covenant	The risk that the sponsoring company becomes unable to continue providing the required financial support to the Scheme.	<ul style="list-style-type: none"><li>• When developing the Scheme's investment and funding objectives, the Trustee takes account of the strength of the covenant ensuring the level of risk the Scheme is exposed to is at an appropriate level for the covenant to support.</li></ul>

The Scheme is exposed to a number of underlying risks relating to the Scheme's investment strategy, these are summarised below:

<b>Risk</b>	<b>Definition</b>	<b>Policy</b>
Interest rates and inflation	The risk of mismatch between the value of the Scheme's assets and present value of liabilities from changes in interest rates and inflation expectations.	To hedge 55% of interest rate and inflation risks.
Liquidity	Difficulties in raising sufficient cash when required without adversely impacting the fair market value of the investment.	To maintain a sufficient allocation to liquid assets so that there is a prudent buffer to pay members benefits as they fall due (including transfer values), and to provide collateral to the LDI manager

Market	Experiencing losses due to factors that affect the overall performance of the financial markets.	To remain appropriately diversified and hedge away any unrewarded risks, where practicable.
Credit	Default on payments due as part of a financial security contract.	To diversify this risk by investing in a range of credit markets across different geographies and sectors where possible.
Environmental, Social and Governance	Exposure to Environmental, Social and Governance factors, including but not limited to climate change, which can impact the performance of the Scheme's investments.	To appoint managers who satisfy the following criteria, unless there is a good reason why the manager does not satisfy each criteria: 1. Has a Responsible Investment ('RI') Policy / Framework 2. Implemented via the investment process 3. A track record of using engagement and any voting rights to manage ESG factors 4. UN PRI Signatory
Currency	The potential for adverse currency movements to have an impact on the Scheme's investments.	To invest in GBP denominated share classes where possible
Non-financial	Any factor that is not expected to have a financial impact on the Scheme's investments.	Non-financial matters are not taken into account in the selection, retention or realisation of investments.

## Appendix B

The Trustee has the following policies in relation to the investment management arrangements for the Scheme:

<b>How the investment managers are incentivised to align their investment strategy and decisions with the Trustee's policies.</b>	<ul style="list-style-type: none"><li>• As the Scheme is invested in pooled funds, there is not scope for these funds to tailor their strategy and decisions in line with the Trustee's policies. However, the Trustee invests in a portfolio of pooled funds that are aligned to the strategic objective.</li></ul>
<b>How the investment managers are incentivised to make decisions based on assessments of medium to long-term financial and non-financial performance of an issuer of debt or equity and to engage with them to improve performance in the medium to long-term.</b>	<ul style="list-style-type: none"><li>• The Trustee reviews the investment managers' performance relative to medium and long-term objectives as documented in the investment management agreements.</li><li>• The Trustee does not incentivise the investment managers to make decisions based on non-financial performance.</li></ul>
<b>How the method (and time horizon) of the evaluation of investment managers' performance and the remuneration for their services are in line with the Trustee's policies.</b>	<ul style="list-style-type: none"><li>• The Trustee reviews the performance of all of the Scheme's investments on a net of cost basis to ensure a true measurement of performance versus investment objectives.</li></ul>
<b>The method for monitoring portfolio turnover costs incurred by investment managers and how they define and monitor targeted portfolio turnover or turnover range.</b>	<ul style="list-style-type: none"><li>• The Trustee does not directly monitor turnover costs. However, the investment managers are incentivised to minimise costs as they are measured on a net of cost basis.</li></ul>
<b>The duration of the Scheme's arrangements with the investment managers</b>	<ul style="list-style-type: none"><li>• The duration of the arrangements is considered in the context of the type of fund the Scheme invests in.<ul style="list-style-type: none"><li>○ As all of the funds are open ended, the duration is flexible and the Trustee will from time-to-time consider the appropriateness of these investments and whether they should continue to be held.</li></ul></li></ul>

## **The Accalon Limited Pension Scheme**

### **Investment Implementation Document (“IID”)**

This Investment Implementation Document (“IID”) covers the Accalon Limited Pension Scheme (the “Scheme”) and details the policy of the Trustee relating to the implementation of the Scheme’s investment arrangements, based on the principles set out in the Scheme’s Statement of Investment Beliefs (“SIB”) dated 8 July 2022.

#### **Investment strategy**

The Scheme’s current investment strategy is invested according to the following broad asset allocation:

<b>Asset Class</b>	<b>Proportion (%)</b>	<b>Expected Return<sup>1</sup> (relative to fixed interest gilts) %</b>
Low Risk Multi Asset Credit	30.0	2.6
Corporate Bonds	35.0	0.8
LDI and Cash	35.0	0.0
<b>Total</b>	<b>100.0</b>	<b>1.1</b>

(1) 10 year assumptions as at 31 March 2022 relative to Bank of England 10 Year Gilts (net of management fees).

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.

#### **Investment structure and mandates**

The Trustee has appointed Mobius Life as the platform provider. The investment strategy and underlying funds are summarised in the table below. Custody is undertaken within each pooled fund. All the investment managers are regulated under the Financial Services and Markets Act 2000.

<b>Investment Manager</b>	<b>Proportion %</b>
M&G PP Total Return Credit Investment Fund	30.0
L&G CN - AAA-AA-A Corporate Bond - All Stocks - Index Fund	35.0
L&G Matching Core Long Real Fund	35.0
L&G Matching Core Long Nominal Fund	
L&G AR – Cash Fund	
<b>Total</b>	<b>100.0</b>



## Mandate target returns, objectives, and fees

### M&G Total Return Credit Fund

Benchmark	Objective	Fees
1 month SONIA	Outperform the benchmark by 3.0% to 5.0% p.a. (gross of fees) over a rolling 3 year period	0.45% p.a.

### L&G CN - AAA-AA-A Corporate Bond - All Stocks - Index Fund

Benchmark	Objective	Fees
Markit iBoxx £ Non-Gilts (ex-BBB) Index	Track the Benchmark	0.06% p.a.

### L&G Matching Core Long Real Fund

Benchmark	Objective	Fees
Gilts comparator and swaps comparator	To match the performance of both comparators over the long term	0.175% p.a.

### L&G Matching Core Long Nominal Fund

Benchmark	Objective	Fees
Gilts comparator and swaps comparator	To match the performance of both comparators over the long term	0.175% p.a.

### L&G AR – Cash Fund

Benchmark	Objective	Fees
Sterling Overnight Index Average	To match the performance of the benchmark	0.05% p.a.

Mobius Life also charge an annual management fee of 0.05% for assets invested via the platform and an additional 0.025% for LDI assets.

Stuart Evans  
**Name**

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**Signature**

8 July 2022  
**Date**