

1 Background

Purpose of Statement	This Statement sets out the principles governing decisions relating to the investment of the assets of the British Board of Agrément Pension and Life Assurance Scheme (the Scheme).
Nature of Scheme	The Scheme is a defined benefit arrangement set up under trust and registered with HM Revenue and Customs (HMRC).
Compliance with Legislation	The Statement has been prepared to comply with Section 35 of the Pensions Act 1995, Section 244 of the Pensions Act 2004, the Occupational Pension Scheme (Investment) Regulations 2005, the Pension Protection Fund (Pensionable Service) and Occupational Pension Scheme (Investment and Disclosure) (Amendment and Modification) Regulations 2018, and the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019.
Availability to Members	A copy of this Statement will be made available to Scheme members on request to the Trustees of the Scheme.
Investment Advice	<p>The Trustees have obtained and considered professional advice on the content of this Statement from Broadstone Corporate Benefits Ltd (Broadstone), their appointed investment adviser. Broadstone have confirmed to the Trustees that they have the appropriate knowledge and experience to give the advice required under legislation.</p> <p>The Trustees will obtain such advice as they consider appropriate and necessary whenever they intend to review or revise this Statement.</p>
Consultation with the Principal Employer	<p>The Trustees have consulted the Principal Employer, The British Board of Agrément, when setting their investment objectives and strategy, and in the preparation of this Statement.</p> <p>Responsibility for maintaining the Statement and determining the Scheme's investment strategy rests solely with the Trustees.</p>
Investment Powers	The Trustees' investment powers are set out in Clauses 15 - 16 of the Definitive Trust Deed and Rules dated 29 March 2000, as amended. The powers granted to the Trustees are wide and this Statement is consistent with those powers.

2 Investment Objectives

Strength of Employer Covenant	<p>The Trustees have considered the strength of the Principal Employer’s willingness and ability to support the Scheme when setting the investment objectives and strategy. They have decided that the employer covenant allows them to take a long-term view.</p>
Key Funding Measure	<p>The Scheme is subject to the Statutory Funding Objective (SFO) introduced by the Pensions Act 2004, i.e. that it should have sufficient and appropriate assets to cover its Technical Provisions, as calculated in accordance with the Trustees’ Statement of Funding Principles.</p> <p>The Trustees have agreed that the funding position measured under the SFO is the assessment of scheme funding that is of most importance to the Trustees, the Principal Employer and members when setting the investment objectives and strategy, as it determines the Scheme’s funding requirements.</p>
Investment Objectives	<p>The Trustees’ investment objectives are as follows:</p> <ul style="list-style-type: none">• To adhere to the provisions contained within the Scheme’s Statement of Funding Principles.• To acquire suitable assets of appropriate liquidity which will generate income and capital growth to meet, together with contributions from the Principal Employer, the cost of the benefits which the Scheme provides, as set out in the Trust Deed and Rules.• To limit the risk of the assets failing to meet the Technical Provisions over the longer term, by considering the Scheme’s liability profile when setting the asset allocation policy.• To minimise the long-term costs of the Scheme by optimising the return on the assets whilst having regard to the objectives shown above.
Paying Regard to the Principal Employer’s Views	<p>The Trustees will have regard to the Principal Employer’s views on the potential costs and risks associated with the investment objectives set and their implementation through the practical strategy.</p>

3 Principles for Setting the Investment Strategy

Selection of Investments

The Trustees may select investments from a wide range of asset classes from time to time, including, but not restricted to UK equities, overseas equities, government bonds, corporate bonds, commercial property and alternative asset classes, such as hedge funds, private equity and infrastructure.

The investments selected will generally be traded on regulated markets and, where this is not the case, any such investments will be kept to a prudent level.

The Trustees may invest in products that use derivatives where this is for the purpose of risk management or to improve the efficiency of the management of the Scheme's investments.

The Trustees may hold insurance policies such as deferred or immediate annuities which provide income to the Scheme, matching part or all of the future liabilities due from it.

The Trustees may hold a working cash balance for the purpose of meeting benefit payments due to members and the expenses of running the Scheme.

Balance of Investments

The Trustees will set a Target Asset Allocation from time to time, determined with the intention of meeting their investment objectives.

The Target Asset Allocation will be set taking account of the characteristics of different asset classes available and will be reviewed in light of any changes to the Trustees' view of the Principal Employer's covenant, the nature of the Scheme's liabilities or relevant regulations governing pension scheme investment.

Delegation to Investment Manager

The Trustees will delegate the day-to-day management of the Scheme's assets to a professional investment manager and will not be involved in the buying or selling of investments.

Realising Investments

The Trustees make disinvestments from the Investment Manager with the assistance of their administrators, Equiniti, and investment adviser, Broadstone, as necessary, to meet the Scheme's cashflow requirements.

4 Setting the Strategy

Target Asset Allocation

The Target Asset Allocation is as follows:

Asset Class	Target Asset Allocation
Equities	30%
Multi-asset income	40%
Liability Driven Investment (LDI) solution*	30%
Total	100%

*Includes an allocation to cash of 30% less the amount required in the LDI funds to achieve the target level of liability hedging.

Investment Manager

The Trustees entered into a contract with Legal & General Investment Management (LGIM) in September 2017. The Investment Manager undertakes day-to-day investment management of the Scheme's assets.

The Investment Manager is authorised and regulated by the Financial Conduct Authority (FCA) under the Financial Services and Markets Act 2000.

Strategies Used

The Trustees use the following funds operated by the Investment Manager.

Fund
Equities
LGIM FTSE RAFI AW 3000 Equity Index Fund
Multi-asset income
LGIM Retirement Income Multi Asset Fund
LDI solution
LGIM Matching Core Funds
LGIM Sterling Liquidity Fund

Maintaining the Target Asset Allocation

The Trustees have responsibility for maintaining the overall balance of the asset allocation relative to the Target Asset Allocation. The Trustees monitor the asset allocation on a regular basis with the assistance of their adviser, Broadstone, and will consider switching assets between funds should the allocation move significantly away from the Target Asset Allocation.

Target Hedging Ratios

For the funds which form part of the LDI allocation, the target hedging ratios against interest rate risk and inflation risk, set relative to the value of the funded Technical Provisions, are as follows:

Liability Driven Investment funds	Target Hedging Ratio
Interest rate risk	90%
Inflation risk	90%

Performance Benchmarks and Objectives

The equity fund is an index-tracking fund, meaning that its objective is to track the total return on a specified market index within an agreed margin over a specified time-scale. The benchmark and tracking criterion for this fund is given below:

Strategy	Benchmark	Tracking Criterion
LGIM FTSE RAFI AW 3000 Equity Index Fund	LGIM FTSE RAFI AW 3000 Composite Index	To track the benchmark to within $\pm 1.0\%$ p.a. (gross of fees) for two years out of every three.

The multi-asset income fund and cash fund are actively managed, with an objective to outperform a specified market benchmark. The objectives for these funds are summarised below:

Fund name	Benchmark	Performance Objective
LGIM Retirement Income Multi Asset Fund	Bank of England base rate	To exceed the benchmark by 3.5% p.a. (gross of fees) over the course of an investment cycle with lower levels of volatility compared to equity markets
LGIM Sterling Liquidity Fund	7 Day LIBID	To provide a cash-like return, comparable with the benchmark

The LGIM Matching Core Funds have an objective to provide a prescribed level of hedging against changes in the value of liabilities for a typical defined benefit pension scheme caused by interest rate and inflation risks. The practical method of implementing this level of hedging is delegated to LGIM, with the expectation that LGIM will choose the most cost-effective method.

Investment Management Charges

The annual management charge for each of the funds used, based on the assets under management at the date of this Statement, are given below:

Fund	Annual Management Charge
LGIM FTSE RAFI AW 3000 Equity Index Fund	0.33% p.a. on the first £5m 0.30% p.a. on the next £10m
LGIM Retirement Income Multi Asset Fund	0.35% p.a.
LGIM Matching Core Funds	0.24% p.a.
LGIM Sterling Liquidity Fund	0.125% p.a.

Employer Related Investment

Neither the Trustees nor the Investment Manager directly hold any employer related investments.

Additional Voluntary Contributions (AVCs)

In the past, the Scheme provided a facility with the Equitable Life Assurance Society and the Prudential Assurance Company for members to pay AVCs to enhance their benefits at retirement. Since the Scheme is now closed to future accrual, no new contributions can be made in respect of AVCs. However, members who paid AVCs in the past retain investments in respect of those contributions.

5 Expected Returns and Risks

Overall Return Target The Trustees' objective is for the Scheme's assets to produce a return in excess of the growth in the value of its liabilities calculated under the SFO.

The Trustees expect the assets to produce a return in excess of the long-term growth in the value of the liabilities calculated under the SFO of between 0.2% per annum and 1.7% per annum, depending on the level of prudence adopted in assessing future expected returns.

Expected Returns Over the long-term, the Trustees' expectations are to achieve the following rates of return from the asset classes they make use of:

Asset Class	Expected return
Global equities	In excess of UK price inflation, as measured by the Retail Prices Index.
Multi-asset income	Comparable with the return from global equities over an economic cycle of five to seven years, with significantly reduced volatility.
LDI solution	In line with the sensitivity of the Scheme's Technical Provisions to changes in interest rates and inflation expectations.

Consideration of Risks The Trustees have considered various risks the Scheme faces, including market risk, interest rate risk, inflation risk, default risk, concentration risk, manager risk and currency risk, and consider that the Target Asset Allocation strikes a reasonable balance between risk mitigation and seeking an appropriate level of return, taking account of the strength of the Principal Employer's covenant and the long-term nature of the Scheme.

Risk Relative to the Value of the Scheme's Key Funding Measure The Target Asset Allocation has been determined with due regard to the characteristics of the Scheme's Technical Provisions.

The calculation of the Scheme's Technical Provisions uses assumptions for future investment returns and price inflation expectations that are based upon market values of financial securities such as fixed interest and index-linked government bonds. This means that the Technical Provisions are sensitive to changes in the price of these assets as market conditions vary, and can have a volatile value.

The Trustees accept that their investment strategy may result in volatility in the Scheme's funding position. Furthermore, the Trustees also accept that there is a risk that the assets will not achieve the rates of investment return assumed in the calculation of the Scheme's Technical Provisions.

Concentration of Risk and Diversification	<p>To reduce the risk of concentration within the portfolio, the Trustees will monitor the overall mix of asset classes and stocks in the investment strategy with their investment adviser, Broadstone.</p> <p>The Trustees invest in a wide range of asset classes through the funds and strategies they use and consider the Scheme’s strategy to be well diversified.</p>
Manager Controls and Custodianship	<p>The day-to-day activities that the Investment Manager carries out for the Trustees are subject to regular internal reviews and external audits by independent auditors to ensure that operating procedures and risk controls remain appropriate.</p> <p>Safe-keeping of the Scheme’s assets held with the Investment Manager is performed by custodians appointed by the Investment Manager.</p>
Manager Security	<p>The Trustees have considered the security of the Scheme’s holdings with the Investment Manager, allowing for its status as a reputable regulated firm, and consider the associated protection offered to be reasonable and appropriate.</p>
Monitoring and Management of Risks	<p>The Trustees will review the investment and funding risks faced by the Scheme with the assistance of their investment adviser and the Scheme Actuary at least every three years. The Trustees will consider the appropriateness of implementing additional risk mitigation strategies as part of such reviews.</p> <p>In addition, the Trustees will review wider operational risks as part of maintaining their risk register.</p>

6 Responsible Investing, Governance and Engagement

Financially Material Considerations Related to Environmental, Social and Governance Considerations

The Trustees recognise that Environmental, Social and Governance (ESG) issues can and will have a material impact on the companies, governments and other organisations that issue or otherwise support the assets in which the Scheme invests. In turn, ESG issues can be expected to have a material financial impact on the returns provided by those assets. The Trustees delegate responsibility for day-to-day decisions on the selection of investments to the Investment Manager. The Trustees have an expectation that the Investment Manager will consider ESG issues in selecting investments, or will otherwise engage with the issuers of the Scheme's underlying holdings on such matters in a way that is expected to improve the long-term return on the associated assets.

The Trustees do not currently impose any specific restrictions on the Investment Manager with regard to ESG issues, but will review this position from time to time. The Trustees receive information from the Investment Manager on its approach to selecting investments and engaging with issuers with reference to ESG issues.

With regard to the specific risk to the performance of the Scheme's investments associated with the impact of climate change, the Trustees take the view that this falls within their general approach to ESG issues. The Trustees regard the potential impact of climate change on the Scheme's assets as a longer term risk and likely to be less material in the context of the short to medium term development of the Scheme's funding position than other risks. The Trustees will continue to monitor market developments in this area with their investment adviser.

Views of Members and Beneficiaries

The Scheme is comprised of a diverse membership, expected to hold a broad range of views on ethical, political, social, environmental, and quality of life issues. The Trustees therefore do not explicitly seek to reflect any specific views through the implementation of the investment strategy.

Engagement and Voting Rights

Responsibility for engagement with the issuers of the Scheme's underlying investment holdings and the use of voting rights is delegated to the Investment Manager. The Trustees can therefore only influence engagement and voting policy indirectly.

The Investment Manager provides, on request, information to the Trustees on its actions in relation to engagement and use of voting rights. The Trustees are therefore aware of the policies adopted by the Investment Manager.

Capital Structure of Investee Companies

Responsibility for monitoring the make up and development of the capital structure of investee companies is delegated to the Investment Manager. The Trustees expect the extent to which the Investment Manager monitors capital structure to be appropriate to the nature of the mandate.

Conflicts of Interest

The Trustees maintain a separate conflicts of interest policy and register.

Subject to reasonable levels of materiality, these documents record any actual or potential conflicts of interest in relation to investee companies or the Investment Manager, while also setting out a process for their management.

Incentivisation of Investment Manager

The Investment Manager is primarily remunerated based on an agreed fixed annual percentage of the asset value for each underlying fund.

The Trustees do not directly incentivise the Investment Manager to align the approach it adopts for a particular fund with the Trustees' policies and objectives. Instead, the Investment Manager and the funds are selected so that, in aggregate, the returns produced are expected to meet the Trustees' objectives.

Neither do the Trustees directly incentivise the Investment Manager to make decisions about the medium to long-term performance of an issuer of debt or equity, or to engage with those issues to improve their performance. The Trustees expect such assessment of performance and engagement to be undertaken as appropriate and necessary to meet the investment objectives of the funds used by the Scheme.

7 Review and Monitoring

Frequency of Review The Trustees will review this Statement at least every three years or if there is a significant change in the Scheme's circumstances or the regulations that govern pension scheme investment.

Monitoring the Investment Strategy and Manager The Trustees employ Broadstone to assist them in monitoring the performance of the Scheme's investment strategy and Investment Manager.

The Trustees receive quarterly reports from the Investment Manager and meet with their representatives periodically to review their investment performance and processes.

The Trustees and Broadstone will monitor the Investment Manager's performance against their performance objectives.

The appropriateness of the Investment Manager's remuneration will be assessed relative to market costs for similar strategies, the skill and resources required to manage the strategy, and the success or otherwise a manager has had in meeting its objectives, both financial and non-financial.

Portfolio Turnover Costs The Trustees expect the Investment Manager to change underlying holdings only to an extent required to meet its investment objectives. The reasonableness of such turnover will vary by fund and change according to market conditions.

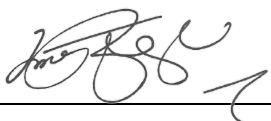
The Trustees therefore do not set a specific portfolio turnover target for their strategy or the underlying funds.

The Investment Manager provides information on portfolio turnover and associated costs to the Trustees so that this can be monitored, as appropriate.

Review of Investment Manager and AVC providers The Trustees will consider on a regular basis whether or not the Investment Manager and AVC providers remain appropriate to continue to manage the Scheme's investments and AVCs.

Information from Investment Manager The Investment Manager will supply the Trustees with sufficient information each quarter to enable them to monitor financial and non-financial performance.

Signed



Name

Jonathan Hazlett

Date

22 September 2020

On behalf of the Trustees of the British Board of Agrément Pension and Life Assurance Scheme