

Statement of Investment Principles for the St Paul's Cathedral (1972) Pension and Life Assurance Scheme

1. Introduction

This Statement of Investment Principles ("SIP") sets out the policy of the Trustee of the St Paul's Cathedral (1972) Pension and Life Assurance Scheme (the "Trustee") on various matters governing decisions about the investments of the St Paul's Cathedral (1972) Pension and Life Assurance Scheme (the "Scheme"), a Defined Benefit ("DB") Scheme. This SIP replaces the previous SIP dated August 2019.

The SIP is designed to meet the requirements of Section 35 (as amended) of the Pensions Act 1995 ("the Act"), the Occupational Pension Schemes (Investment) Regulations 2005 (as amended) and the Pension Regulator's guidance for defined benefit pension schemes (March 2017).

This SIP has been prepared after obtaining and considering written professional advice from LCP, the Scheme's investment adviser, whom the Trustee believes to be suitably qualified and experienced to provide such advice. The advice takes into account the suitability of investments including the need for diversification given the circumstances of the Scheme and the principles contained in this SIP. The Trustee has consulted with the employer in producing this SIP.

The Trustee will review this SIP from time to time and, with the help of its advisers, will amend it as appropriate. These reviews will take place as soon as practicable after any significant change in investment policy and at least once every three years.

- **Appendix 1** sets out details of the Scheme's investment governance structure, including the key responsibilities of the Trustee, investment advisers and investment managers. It also contains a description of the basis of remuneration of the Scheme's advisers.
- **Appendix 2** sets out the Trustee's policy towards risk appetite, capacity, measurement and management.
- **Appendix 3** sets out the Scheme's investment manager arrangements. It also contains a description of the basis of remuneration of the investment managers.

2. Investment objectives

The Trustees' objectives are that:

- the Scheme should be able to meet benefit payments as they fall due; and
- the Scheme's funding position (ie the value of its assets relative to the assessed value of its liabilities) should remain at an appropriate level. The Trustees are aware that there are various measures of funding, and have given due weight to those considered most relevant to the Scheme. In particular, the Trustees have taken into

account the funding requirements detailed in the Occupational Pension Schemes (Scheme Funding) Regulations 2005.

3. Investment strategy

The Trustee, with the help of its advisers and in consultation with the employer, reviewed the investment strategy for the Scheme in 2017, taking into account the objectives described in Section 2 above.

The result of the review was that the Trustee agreed that the investment strategy of the Scheme should be based on the allocation below.

Asset class	Strategic allocation
Equity portfolio	10%
Diversified Growth Fund Portfolio	15%
Absolute Return Bond Fund Portfolio	30%
Dynamic Liability Driven Investment ("LDI") Portfolio (including cash)	45%
Total	100%

The Dynamic LDI portfolio is designed to hedge broadly 100% of interest rate and inflation risk on a Technical Provisions basis as at March 2018. The Trustee recognises that because this portfolio utilises leverage, its economic exposure will be different to the amount of assets invested in the portfolio.

There is no formal rebalancing policy. The Trustee monitors the asset allocation from time to time. If material deviations from the strategic allocation occur the Trustee will consider with its advisers whether it is appropriate to rebalance the assets taking into account factors such as market conditions and anticipated future cash flows.

4. Considerations in setting the investment arrangements

When deciding how to invest the Scheme's assets, the Trustee considers a number of risks, including, but not limited to, those set out in Appendix 2. Some of these risks are more quantifiable than others, but the Trustee has tried to allow for the relative importance and magnitude of each risk.

The Trustee considered a wide range of asset classes for investment, taking account of the expected returns and key individual risks associated with those asset classes as well as how these risks can be mitigated where appropriate. The key financial assumptions made by the Trustee in determining the investment arrangements as at 31 March 2018 were as follows:

Asset class	Average long-term expected excess return over gilts (% pa)
UK equities	5.0%
Overseas equities	5.0%
Overseas equities (currency hedged)	4.9%
Diversified Growth Funds	3.0%
Absolute Return Bond Funds	1.5%
Dynamic LDI Funds	1.0%

In setting the strategy the Trustee took into account:

- the Scheme's investment objectives, including the target return required to meet the Trustee's investment objectives;
- the Scheme's cash flow requirements in order to meet benefit payments in the near to medium term;
- the best interests of all members and beneficiaries;
- the circumstances of the Scheme, including the profile of the benefit cash flows (and the ability to meet these in the near to medium term), the funding level, and the strength of the employer covenant;
- the risks, rewards and suitability of a number of possible asset classes and investment strategies and whether the return expected for taking any given investment risk is considered sufficient given the risk being taken;
- the need for appropriate diversification between different asset classes to ensure that both the Scheme's overall level of investment risk and the balance of individual asset risks are appropriate; and
- the Trustee's investment beliefs about how investment markets work, and which factors are most likely to impact investment outcomes.

The Trustees' key investment beliefs, which influenced the setting of the investment arrangements are as follows:

- asset allocation is the primary driver of long-term returns;
- risk-taking is necessary to achieve return, but not all risks are rewarded;
- equity and credit are the primary rewarded risks;
- risks that are typically not rewarded, such as interest rate and inflation should generally be avoided, hedged or diversified;

- investment managers who can consistently spot and profitably exploit equity market opportunities are difficult to find and therefore passive¹ management, where available, is usually better value;
- outside of equity markets there are opportunities for good active managers to add value, particularly where they are given the discretion to make asset allocation decisions, or when constructing portfolios with a focus on capital preservation;
- environmental, social and governance (ESG) factors are likely to be one area of market inefficiency and so managers may be able to improve risk-adjusted returns by taking account of ESG factors;
- long-term environmental, social and economic sustainability are factors that investment managers should consider when making investment decisions;
- responsible investment in well governed companies and engaging as long-term owners can reduce risk over time and may positively impact investment returns; and
- costs have a significant impact on long-term performance and therefore obtaining value for money from the investments is important.

5. Implementation of the investment arrangements

Before investing in any manner, the Trustee obtains and considers proper written advice from its investment adviser on the question of whether the investment is satisfactory, having regard to the need for suitable and appropriately diversified investments.

Details of the investment managers are set out in Appendix 3.

The Trustee has signed agreements with the investment managers setting out in detail the terms on which the portfolios are to be managed. The investment managers' primary role is the day-to-day investment management of the Scheme's investments. The managers are authorised under the Financial Services and Markets Act 2000 (as amended) to carry out such activities.

The Trustee and investment managers, to whom discretion has been delegated, exercise their powers to giving effect to the principles in this Statement of Investment Principles, so far as is reasonably practicable.

The Trustee has limited influence over managers' investment practices because all the Scheme's assets are held in pooled funds, but it encourages its managers to improve their practices where appropriate.

The Trustee's view is that the fees paid to the investment managers, and the possibility of their mandate being terminated, ensure they are incentivised to provide a high quality service that meets the stated objectives, guidelines and restrictions of the fund. However, in practice managers cannot fully align their strategy and decisions to the (potentially conflicting) policies of all their pooled fund investors in relation to strategy, long-term performance of debt/equity issuers, engagement and portfolio turnover.

¹ Passive management includes a range of rules-based portfolio construction strategies

Page 5 of 18 It is the Trustee's responsibility to ensure that the managers' investment approaches are consistent with its policies before any new appointment, and to monitor and to consider terminating any existing arrangements that appear to be investing contrary to those policies. The Trustee expects investment managers, where appropriate, to make decisions based on assessments of the longer term financial and non-financial performance of debt/equity issuers, and to engage with issuers to improve their performance. It assesses this when selecting and monitoring managers.

The Trustee evaluates investment manager performance by considering performance over both shorter and longer-term periods as available. Except in closed-ended funds where the duration of the investment is determined by the fund's terms, the duration of a manager's appointment will depend on strategic considerations and the outlook for future performance. Generally, the Trustee would be unlikely to terminate a mandate on short-term performance grounds alone.

The Trustee's policy is to evaluate each of its investment managers by reference to the manager's individual performance as well as the role it plays in helping the Scheme meet its overall long-term objectives, taking account of risk, the need for diversification and liquidity. Each manager's remuneration, and the value for money it provides, is assessed in light of these considerations.

The Trustee recognises that portfolio turnover and associated transaction costs are a necessary part of investment management and that the impact of portfolio turnover costs is reflected in performance figures provided by the investment managers. The Trustee expects its investment consultant to incorporate portfolio turnover and resulting transaction costs as appropriate in its advice on the Scheme's investment mandates.

6. Realisation of investments

The investment managers have discretion over the timing of realisation of investments of the Scheme within the portfolios that they manage, and in considerations relating to the liquidity of investments.

When appropriate, the Trustee, on the administrators' recommendation, decides on the amount of cash required for benefit payments and other outgoings and informs the investment managers of any liquidity requirements. The Trustee's preference is for investments that are readily realisable, but recognise that achieving a well-diversified portfolio may mean holding some investments that are less liquid. In general, the Trustee's policy is to make regular disinvestments from the BMO cash fund to meet cash flow requirements.

7. Consideration of financially material and non-financial matters

The Trustee has considered how environmental, social, governance ("ESG") and ethical factors should be taken into account in the selection, retention and realisation of investments since it recognises that these factors can be relevant to investment performance.

Page 6 of 18 The Trustee expects its investment managers to take account of financially material considerations (including climate change and other ESG considerations). The Trustee seeks to appoint managers that have appropriate skills and processes to do this, and from time to time reviews how its managers are taking account of these issues in practice.

The Trustee has limited influence over managers' investment practices where assets are held in pooled funds, but it encourages its managers to improve their practices where appropriate.

The Trustee does not take into account any non-financial matters (ie matters relating to the ethical and other views of members and beneficiaries, rather than considerations of financial risk and return) in the selection, retention and realisation of investments.

8. Stewardship

The Trustee recognises its responsibilities as owners of capital, and believes that good stewardship practices, including monitoring and engaging with investee companies, and exercising voting rights attaching to investments, protect and enhance the long-term value of investments. The Trustee has delegated to its investment managers the exercise of rights attaching to investments, including voting rights, and engagement with issuers of debt and equity and other relevant persons about relevant matters such as performance, strategy, risks and ESG considerations.

The Trustee does not monitor or engage directly with issuers or other holders of debt or equity. It expects the investment managers to exercise ownership rights and undertake monitoring and engagement in line with the managers' general policies on stewardship, as provided to the Trustee from time to time, taking into account the long-term financial interests of the beneficiaries. The Trustee seeks to appoint managers that have strong stewardship policies and processes, reflecting where relevant the recommendations of the UK Stewardship Code issued by the Financial Reporting Council, and from time to time the Trustee reviews how these are implemented in practice.

SIP signed for and on behalf of the Trustee of the Scheme:

Signed: _____

Investment governance, responsibilities, decision-making and fees

The Trustee has decided on the following division of responsibilities and decision-making for the Scheme. This division is based upon the Trustee's understanding of the various legal requirements placed upon it, and its view that the division of responsibility allows for efficient operation and governance of the Scheme overall. The Trustee's investment powers are set out within the Scheme's governing documentation.

Trustee

In broad terms, the Trustee is responsible in respect of investment matters for:

- setting the investment strategy, in consultation with the employer;
- developing a mutual understanding of investment and risk issues with the employer;
- formulating a policy in relation to financially material considerations, such as those relating to ESG considerations (including but not limited to climate change);
- formulating a policy on taking account of non-financial matters in the selection, retention and realisation of investments; reviewing the investment policy as part of any review of the investment strategy;
- setting the policy for rebalancing between asset classes;
- setting a policy on the exercise of rights (including voting rights) and undertaking engagement activities in respect of the investments;
- appointing (and, when necessary, dismissing) investment managers, investment advisers, actuary and other service providers;
- monitoring the exercise of the investment powers that they have delegated to the investment managers and monitoring compliance with Section 36 of the Act;
- communicating with members as appropriate on investment matters, such as the Trustee's assessment of its effectiveness as a decision-making body, the policies regarding responsible ownership and how such responsibilities have been discharged;
- putting effective governance arrangements in place and documenting these arrangements in a suitable form;
- reviewing the content of this SIP from time to time and modifying it if deemed appropriate; and
- consulting with the employer(s) when reviewing the SIP.

Investment managers

In broad terms, the investment managers will be responsible for:

3574261

Page 8 of 18

- managing the portfolios of assets according to their stated objectives, and within the guidelines and restrictions set out in their respective investment manager agreements and/or other relevant governing documentation.
- taking account of financially material considerations (including climate change and other ESG considerations) as appropriate when managing the portfolios of assets;
- exercising rights (including voting rights) attaching to investments and undertaking engagement activities in respect of investments;
- providing the Trustee with regular information concerning the management and performance of their respective portfolios; and
- having regard to the provisions of Section 36 of the Act insofar as it is necessary to do so.

The custodians of the portfolios (whether there is a direct relationship between the custodian and the Trustee or not) are responsible for safe keeping of the assets and facilitating all transactions within the portfolios.

Investment adviser

In broad terms, the investment adviser will be responsible, in respect of investment matters, as requested by the Trustee, for:

- advising on how material changes within the Scheme's benefits, membership, and funding position may affect the manner in which the assets should be invested and the asset allocation policy;
- advising on the selection, and review, of the investment managers; and
- participating with the Trustee in reviews of this SIP.

Fee structures

The Trustee recognises that the provision of investment management and advisory services to the Scheme results in a range of charges to be met, directly or indirectly, by deduction from the Scheme's assets.

The Trustee has agreed Terms of Business with the Scheme's actuarial and investment advisers, under which work undertaken is charged for by an agreed fixed fee or on a "time-cost" basis.

The fee structure used in each case has been selected with regard to existing custom and practice, and the Trustee's view as to the most appropriate arrangements for the Scheme. However, the Trustee will consider revising any given structure if and when it is considered appropriate to do so.

Performance assessment

The Trustee is satisfied, taking into account the external expertise available, that there are sufficient resources to support its investment responsibilities. The Trustee believes that it has sufficient expertise and appropriate training to carry out its role effectively.

3574261

Page 9 of 18

It is the Trustee's policy to assess the performance of the Scheme's investments, investment providers and professional advisers from time to time. The Trustee will also periodically assess the effectiveness of its decision-making and investment governance processes and will decide how this may then be reported to members.

Working with the Scheme's employer

When reviewing matters regarding the Scheme's investment arrangements, such as the SIP, the Trustee seeks to give due consideration to the employer's perspective. While the requirement to consult does not mean that the Trustee needs to reach agreement with the employer, the Trustee believes that better outcomes will generally be achieved if the Trustee and employer work together collaboratively.

1. Risk appetite and risk capacity

Risk appetite is a measure of how much risk the Trustee is willing to bear within the Scheme in order to meet its investment objectives. Taking more risk is expected to mean that those objectives can be achieved more quickly, but it also means that there is a greater likelihood that the objectives are missed, in the absence of remedial action. Risk capacity is a measure of the extent to which the Trustee can tolerate deviation from its long term objectives before attainment of those objectives is seriously impaired. The Trustee's aim is to strike the right balance between risk appetite and risk capacity.

When assessing its risk appetite and risk capacity, the Trustee considered a range of qualitative and quantitative factors, including:

- the strength of the employer's covenant and how this may change in the near/medium future;
- the agreed journey plan and employer contributions;
- the Scheme's long-term and shorter-term funding targets;
- the Scheme's liability profile, its interest rate and inflation sensitivities, and the extent to which these are hedged;
- the Scheme's cash flow and target return requirements; and
- the level of expected return and expected level of risk (as measured by Value at Risk ("VaR")), now and as the strategy evolves.

2. Approach to managing and monitoring investment risks

The Trustee considers that there are a number of different types of investment risk that are important to manage and monitor. These include, but are not limited to:

2.1. Risk of inadequate returns

A key objective of the Trustee is that, over the long-term, the Scheme should generate its target return so that it has adequate assets to meet its liabilities as they fall due. The Trustee therefore invests the assets of the Scheme to produce a sufficient long-term return in excess of the liabilities. There is also a risk that the performance of the Scheme's assets and liabilities diverges in certain financial and economic conditions in the short term. This risk has been taken into account in setting the investment strategy and is monitored by the Trustee on a regular basis.

2.2. Risk from lack of diversification

This is the risk that failure of a particular investment, or the general poor performance of a given investment type, could materially adversely affect the Scheme's assets. The Trustee believes that the Scheme's assets are adequately diversified between different asset classes and within each asset

class. This was a key consideration when determining the Scheme's investment arrangements and is monitored by the Trustee on a regular basis.

2.3. Investment manager risk

This is the risk that an investment manager fails to meet its investment objectives. Prior to appointing an investment manager, the Trustee receives written advice from a suitably qualified individual and will typically undertake an investment manager selection exercise. The Trustee monitors the investment managers on a regular basis to ensure it remains appropriate for its selected mandates.

2.4. Liquidity/marketability risk

This is the risk that the Scheme is unable to realise assets to meet benefit cash flows as they fall due, or that the Scheme will become a forced seller of assets in order to meet benefit payments. The Trustee is aware of the Scheme's cash flow requirements and believes that this risk is managed by maintaining an appropriate degree of liquidity across the Scheme's investments.

2.5. Environmental, social and governance (ESG) risks

Environmental, social and corporate governance (ESG) factors are sources of risk to the Scheme's investments, some of which could be financially material, over both the short and longer term. These potentially include risks relating to factors such as climate change, unsustainable business practices, and unsound corporate governance. The Trustee seeks to appoint investment managers who will manage these risks appropriately on their behalf and from time to time reviews how these risks are being managed in practice.

2.6. Collateral adequacy risk

The Scheme is invested in leveraged Liability Driven Investment ("LDI") arrangements to provide protection ("hedging") against adverse changes in interest rates and inflation expectations. The LDI manager may from time to time call for additional cash to be paid to the LDI portfolio in order to support a given level of leverage. Collateral adequacy risk is the risk that the Trustee when requested to do so will not be able to post additional cash to the LDI fund within the required timeframe. A potential consequence of this risk is that the Scheme's interest rate and inflation hedging could be reduced and that the Scheme's funding level could suffer subsequently as a result. In order to manage this risk, the Trustee ensures that the Scheme has a sufficient allocation to cash and other highly liquid assets which can be readily realised, so that cash can be posted to the LDI manager at short notice.

2.7. 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 Scheme invests in pooled funds and is therefore directly exposed to credit risk in relation to solvency of the investment manager and custodian of each fund.

Direct credit risk arising from pooled funds is mitigated by the underlying assets of the pooled arrangements being ring-fenced from the investment managers, the regulatory environments in which the pooled managers operate and diversification of the Scheme's investments amongst a number of pooled arrangements. The Trustee carries out due diligence checks on the appointment of new pooled investment managers, and on an ongoing basis monitors any changes to the operating environment of the pooled funds.

The Scheme is indirectly exposed to credit risks arising from the underlying investments held by the pooled funds, where they invest in bonds or through counterparties. The indirect exposure to credit risk arises from the Scheme's investments in the Ruffer DGF, the Newton and Payden & Rygel Absolute Return Bond funds, the BMO LDI funds and the BMO Sterling Liquidity Fund.

The managers of these pooled funds manage credit risk by having a diversified exposure to bond issuers, conducting thorough research on the probability of default of those issuers, and having only a limited exposure to bonds rated below investment grade.

Ruffer can invest in a wide range of credit instruments, including non-investment grade fixed income securities. Ruffer has discretion over the amount of credit risk to take within the fund in order to meet its performance objectives. The magnitude of credit risk will vary over time, as the manager changes the underlying investments in line with its views on markets, asset classes and specific bonds. Ruffer seeks to maintain a diversified range of investments across asset classes, such that the individual exposure to credit risk is not a significant part of the overall risk of the fund.

The Absolute Return Bond managers invest in a wide range of credit instruments, and have discretion over the credit rating of each of the underlying bond holdings. The average credit rating of the funds will vary over time. Both managers hold a diversified portfolio of predominantly short-dated, investment grade bonds.

Within the LDI portfolios, there is exposure to credit risk as BMO uses derivative instruments such as interest rate swaps to efficiently match the Scheme's liabilities. When investing in interest rate swaps, credit risk is limited to the credit risk of the bank counterparty (ie counterparty risk) in question. Counterparty risk is managed through careful initial selection and on-going monitoring of trading counterparties and counterparty diversification. The terms under which the LDI portfolios are managed include provisions to manage the exposure to credit risk, such as limits on the exposure to any single counterparty and minimum credit ratings that all counterparties must meet. In

addition, the derivative positions are collateralised daily, to ensure that the extent of credit risk is limited to one day's market movements.

The Trustee monitors the credit risk of the aforementioned funds against their respective objectives and restrictions on a regular basis.

2.8. Currency risk

As the Scheme's liabilities are denominated in Sterling, any non-Sterling currency exposure within the assets presents additional currency risk.

All of the Scheme's pooled funds are accessed via a Sterling share class; therefore the Scheme is not subject to direct currency risk. The Scheme's assets that are exposed to indirect currency risk are the Ruffer DGF, the Newton and Payden & Rygel Absolute Return Bond funds and the L&G unhedged overseas equity funds, which invest in non-Sterling investments.

Ruffer and the investment managers of the Absolute Return Bond funds have discretion over the amount of currency risk to take within each fund in order to meet their respective performance objectives. The magnitude of currency risk within each fund will vary over time, as the manager changes the underlying investments in line with its views on markets, asset classes and specific currencies. Typically, the managers will hedge currency risk unless they expect it to contribute positively to returns or to provide diversification against other positions and risks run within the fund. The managers seek to maintain a diversified range of investments across asset classes and currencies, such that the individual exposure to currency risk is not a significant part of the overall risk of the fund.

The Trustee considers the overseas currency exposure in the context of the overall investment strategy, and believes that the non-Sterling currency exposure that exists diversifies the strategy and is appropriate. The Trustee monitors the currency risk of the aforementioned funds against their respective objectives and restrictions on a regular basis.

2.9. Interest rate and inflation risk

The Scheme's assets are subject to interest rate and inflation risk because some of the Scheme's assets are held in bonds, interest rate swaps and inflation swaps, via pooled funds. However, the interest rate and inflation exposure of the Scheme's assets hedges part of the corresponding risks associated with the Scheme's liabilities.

The Trustee considers interest rate and inflation risks to be generally unrewarded investment risks. As a result, the Trustee aims to hedge around 100% of the Scheme's exposure to interest rate risk and inflation risk, as measured on a Technical Provisions basis, by investing in leveraged LDI arrangements managed by BMO Global Asset Management.

The net effect of the Trustee's approach to interest and inflation risk will be to reduce the volatility of the funding level, and so the Trustee believes that it is appropriate to manage exposures to these risks in this manner and to review them on a regular basis.

2.10. Other non-investment risks

The Trustee recognises that there are other, non-investment, risks faced by the Scheme, and takes these into consideration as far as practical in setting the Scheme's investment arrangements as part of its assessment of the other aspects of the Scheme's Integrated Risk Management framework.

Examples include:

- longevity risk (the risk that members live, on average, longer than expected); and
- sponsor covenant risk (the risk that, for whatever reason, the sponsoring employer is unable to support the Scheme as anticipated).

Together, the investment and non-investment risks give rise generally to funding risk. This is the risk that the Scheme's funding position falls below what is considered an appropriate level. The Trustee regularly reviews progress towards the Scheme's funding target, both in the longer-term as well as against short-term milestones, comparing the actual versus the expected funding level.

By understanding, considering and monitoring the key risks that contribute to funding risk, the Trustee believes that it has appropriately addressed and are positioned to manage this general risk.

Investment manager arrangements

Details of the investment managers, their objectives, and investment are set out below.

1. Legal & General Investment Management (“LGIM”) – Equities

The Trustee has selected LGIM as the investment manager for the Scheme’s equity portfolio. The benchmarks and performance objectives for the funds are listed in the table below. The funds are priced weekly, open-ended and unlisted. There is no formal benchmark asset allocation between the equity funds.

Fund	Benchmark Index	Performance Objective
UK Equity Index Fund	FTSE All-Share Index	To track the sterling total return of the benchmark to within +/-0.25% pa for two years in three
North America Equity Index Fund	FTSE All-World Developed North America Index	To track the sterling total return of the benchmark to within +/-0.5% pa for two years in three
Europe (ex UK) Equity Index Fund	FTSE All-World Developed Europe (ex UK) Index	To track the sterling total return of the benchmark to within +/-0.5% pa for two years in three
Japan Equity Index Fund	FTSE All-World Japan Index	To track the sterling total return of the benchmark to within +/-0.5% pa for two years in three
Asia Pacific (ex Japan) Equity Index Fund	FTSE All-World Asia Pacific (ex Japan) Index	To track the sterling total return of the benchmark to within +/-0.75% pa for two years in three
World (ex UK) Equity Index Fund – GBP Hedged	FTSE World (ex UK) Index – GBP Hedged (with the exception of advanced emerging markets)	To track the total return of the benchmark to within +/-0.5% pa for two years in three

3574261

2. Ruffer LLP (“Ruffer”) – Diversified Growth

Page 16 of 18

The Scheme invests in Diversified Growth through a pooled fund called the Absolute Return Fund. The objective of this fund is to preserve capital over rolling twelve month periods and to achieve returns (after fees) above that reasonably expected from the alternative of depositing the cash value of assets in a reputable UK bank. The fund is priced weekly, open-ended and unlisted.

3. Newton Investment Management (“Newton”) – Absolute Return Bonds

The Scheme invests in Absolute Return Bonds through a pooled fund called the Global Dynamic Bond Fund. The objective of the fund is to outperform 1 month GBP LIBOR by 2% pa, before the deduction of fees, over rolling five year periods. In achieving its objective, Newton also aims to achieve a positive return over any rolling three year period. The fund is priced daily, open-ended and unlisted.

4. Payden & Rygel Global Limited (“Payden & Rygel”) – Absolute Return Bonds

The Scheme invests in Absolute Return Bonds through a pooled fund called the Payden Absolute Return Bond Fund. The objective of the fund is to outperform 1 month GBP LIBOR by 3% pa, after the deduction of fees, over rolling three year periods. The fund is priced daily, open-ended and unlisted.

5. BMO Global Asset Management (“BMO”) – Dynamic LDI portfolio

The Trustee has selected BMO as the investment manager for the Scheme’s Dynamic LDI portfolio. The benchmarks and performance objectives for the funds are listed in the table below. The Dynamic LDI and Sterling Liquidity Fund are priced daily, open-ended and unlisted.

Fund	Benchmark Index	Performance Objective
Real Dynamic LDI Fund	The present value of a representative set of pension scheme liabilities, measured using both a swaps based discount rate and a gilts based discount rate	To match the interest rate and inflation characteristics of a representative set of pension scheme liabilities
Nominal Dynamic LDI Fund	The present value of a representative set of pension scheme liabilities, measured using both a swaps based discount rate and a gilts based discount rate	To match the interest rate characteristics of a representative set of pension scheme liabilities
Sterling Liquidity Fund	7 Day GBP LIBID	To provide a return in line with the benchmark

3574261 6. Fee structures

Page 17 of 18

The Trustee recognises that the provision of investment management services to the Scheme results in a range of charges to be met, directly or indirectly, by deduction from the Scheme's assets. The fee arrangements with the investment managers are summarised below:

Investment manager	Annual management charges
L&G	
UK Equity Index Fund	0.10% for the first £10 million
North America Equity Index Fund	0.20% for the first £1 million 0.175% for the next £1.5 million
Europe (ex UK) Equity Index Fund	0.25% for the first £1 million 0.225% for the next £1.5 million
Japan Equity Index Fund	0.225% for the first £1 million 0.20% for the next £1.5 million
Asia Pacific (ex Japan) Equity Index Fund	0.275% for the first £1 million 0.25% for the next £1.5 million
World (ex UK) Equity Index Fund – GBP Hedged	0.243% pa for the first £5m 0.213%pa for the next £10m
Newton	
Global Dynamic Bond Fund	0.40% pa
Payden & Rygel	
Absolute Return Bond Fund	0.45% pa
BMO	
Real Dynamic LDI Fund	0.28% pa for the first £15m 0.24% pa for the next £35m
Nominal Dynamic LDI Fund	0.28% pa for the first £15 0.24% pa for the next £35m
Sterling Liquidity Fund	0.10% pa

The fee rates are believed to be consistent with the managers' general terms for institutional clients and are considered by the Trustees to be reasonable when compared with those of other similar providers.

The fee structure used in each case has been selected with regard to existing custom and practice, and the Trustees' view as to the most appropriate arrangements for the Scheme. However, the Trustees will consider revising any given structure if and when it is considered appropriate to do so.

3574261 **3. Additional Voluntary Contributions**

Page 18 of 18 The Trustees have AVC contracts with Guardian Assurance Ltd, The Equitable Life Assurance Society and Friends Life Service Limited for the receipt of members' Additional Voluntary Contributions. These arrangements are reviewed regularly.