

Statement of Investment Principles for the MITIE Group plc Pension Scheme

5 September 2019

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1. Introduction

This Statement of Investment Principles ("SIP") sets out the policy of MITIE Group Pension Scheme Trustee ("the Trustee") on various matters governing decisions about the investments of the MITIE Group plc Pension Scheme ("the Scheme"), a Defined Benefit ("DB") Scheme. This SIP replaces the previous SIP from February 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.

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 Principal Employer, Mitie Treasury Management Limited ("the Employer"), and has taken the Employer's comments into account where appropriate. (The Employer acts on behalf of any participating employers of the Scheme).

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 investment adviser and the investment managers.
- **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.

2. Investment objectives

The primary objective is to ensure that the Scheme should be able to meet benefit payments as they fall due. In addition to this primary objective, the Trustee has additional objectives. These are as follows:

- that the expected return on the Scheme's assets is maximised whilst managing and maintaining investment risk at an appropriate level. What the Trustee determines to be an appropriate level of risk is set out in Appendix 2.
- that the Scheme should be fully funded on a technical provisions basis (ie the asset value should be at least that of its liabilities on this basis). The Trustee is aware that

there are various measures of funding and has given due weight to those considered most relevant to the Scheme.

3. Investment strategy

The Trustee, with the help of its advisers and in consultation with the employer, last reviewed the investment strategy for the Scheme in March 2019, 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 de-risked and is currently based on the allocation below.

Asset class	Strategic allocation %
Return seeking assets	58.0
UK equities	13.0
Overseas equities	14.0
Diversified growth	9.0
UK property	8.0
Unlisted infrastructure	4.0
Emerging market multi-asset	10.0
Matching assets	42.0
Total	<u>100.0</u>

The Trustee monitors the actual asset allocation of assets from time to time and rebalances them accordingly.

Recognising that the Scheme is closed to new members and therefore will be maturing over time, the Trustee is also considering introducing a de-risking switching mechanism which would switch assets from the return seeking portfolio to matching assets, following periods of significant outperformance by the return seeking assets and increase the level of interest rate and inflation hedging of the Scheme's liabilities over time. If adopted, the proportion of matching assets would be expected to increase as the proportion of return seeking assets declines in future.

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. Based on the agreed allocations and the financial assumptions set out below, the assets are expected to outperform gilts over the longer term by around 3.0% pa. The key financial assumption made in determining the investment arrangements is that over the long term:

- equity-type investments are expected to outperform gilts by 5.0% pa;
- diversified growth investments are expected to outperform gilts by 3.0% pa;
- emerging market multi-asset investments are expected to outperform gilts by 4.7% pa;
- UK property investments are expected to outperform gilts by 3.2% pa;
- infrastructure investments are expected to outperform gilts by 4.0% pa;
- absolute return bond investments are expected to outperform gilts by 1.5% pa; and
- liability driven investment ("LDI") which is managed dynamically, is expected to outperform gilts by 1.0% pa.

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;
- any other considerations which the Trustee consider financially material over the time horizon that the Trustee considers is needed for the funding of future benefits by the investments of the Scheme; and
- the Trustee's investment beliefs about how investment markets work and which factors are most likely to impact investment outcomes.

The Trustee's 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, credit and illiquidity are the primary rewarded risks;
- risks that do not have an expected reward should generally be avoided, hedged or diversified;
- investment markets are not always efficient and there may be opportunities for good active managers to add value;

- 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;
- investment managers who can consistently spot and profitably exploit market opportunities are difficult to find and therefore unless the Trustee is confident that a manager can add value it will look to invest in passive management, where available;
- long-term environmental, social and economic sustainability is one factor that trustees should consider when making investment decisions; 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 entered into a contract with an investment platform provider, Legal & General ("L&G"). The platform allows the Trustee to access and make changes to the majority of the Scheme's investments relatively easily. With the exception of the property and infrastructure mandates, all the Scheme's assets are accessed via L&G's institutional fund platform. As required, L&G is also able to rebalance these assets automatically based on the terms set out in the benchmark letter.

The Trustee has signed agreements with the investment managers, and the platform provider 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 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.

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 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 recognises that achieving a well-diversified portfolio may mean holding some investments that are less liquid (eg property). In general, the Trustee's policy is to use cash flows to rebalance the Scheme's assets towards the strategic asset allocation, and also receive income from some of the portfolios where appropriate.

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, given the time horizon of the Scheme and its members.

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. Voting and engagement

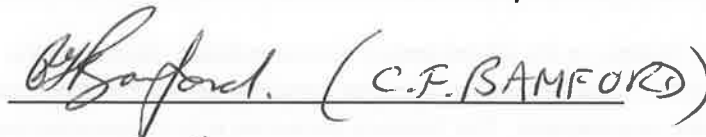
The Trustee recognises its responsibilities as owners of capital, and believes that good stewardship practices, including monitoring and engaging with investee companies, and exercising voting rights attaching to investments, protect and enhance the long-term value of investments. The Trustee has delegated 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, capital structure, management of actual or potential conflicts of interest, 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, considering the long-term financial interests of the beneficiaries.

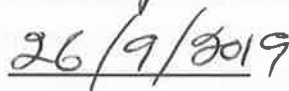
The Trustee seeks to appoint managers that have strong stewardship policies and processes, reflecting where relevant the recommendations of the UK Stewardship Code issued by the Financial Reporting Council, and from time to time the Trustee reviews how these are implemented in practice.

SIP signed for and on behalf of the Trustee of the MITIE Group PLC Pension Scheme:

Signed:

 (C.F. BAMFORD)

Date:



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.

1. Trustee

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

- developing a mutual understanding of investment and risk issues with the employer;
- setting the investment strategy, in consultation 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;
- 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;
- putting effective governance arrangements in place and documenting these arrangements in a suitable form;
- appointing, monitoring, reviewing and 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;
- reviewing the investment policy as part of any review of the investment strategy;
- reviewing the content of this SIP from time to time and modifying it if deemed appropriate; and
- consulting with the employer when reviewing the SIP.

The Trustee has delegated consideration of certain investment matters to an investment sub-committee, although any decisions remain the responsibility of the Trustee.

The Investment Sub-Committee, which will consist of the Trustee Chairman and at least one of the Company nominated Trustee Directors, will be responsible for:

- taking and reviewing investment decisions within a mandatory authority limit; and
- reporting back to the Trustee at the regular Trustee meetings.

The terms of reference for the ISC detail clearly its responsibilities.

3. Platform provider

The investment platform provider will be responsible for:

- providing access to a range of funds managed by various investment managers;
- where instructed to do so, rebalancing the assets on a quarterly basis in accordance with guidelines agreed with the Trustee; and
- providing the Trustee with regular information concerning the management and performance of the assets.

4. Investment managers

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

- 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 and investment platform provider 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 each manager's portfolio.

5. Investment adviser

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, review and potential replacement of the investment managers incorporating its assessment of the nature and effectiveness of the managers' approaches to financially material considerations (including climate change and other ESG considerations); and
- participating with the Trustee in reviews of this SIP.

6. 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 investment advisers, under which work undertaken is charged for by an agreed fixed fee or on a "time-cost" basis.

The investment managers and platform provider receives fees calculated by reference to the market value of assets under management and also in some cases a performance related fee. The fee rates are believed to be consistent with the manager's general terms for institutional clients and are considered by the Trustee to be reasonable when compared with those of other similar providers. See also Section 5 of the SIP.

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.

7. 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.

It is the Trustee's policy to assess the performance of the Scheme's investments, investment providers and professional advisers from time to time. See Section 5 of the SIP. 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.

8. 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 aims to strike the right balance between risk appetite and risk capacity.

When assessing the 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.

At the time of agreeing the Scheme's current investment strategy, the Scheme's 1 year 95% Value at Risk was estimated to be £24m¹. This means that there is estimated to be a 1 in 20 chance that the Scheme's funding position will worsen by £24m or more, compared to the expected position, over a one year period. When deciding on the current investment strategy, the Trustee believed this level of risk to be appropriate given the Trustee's and employer's risk appetite and capacity, given the Scheme's objectives.

2. Approach to managing and monitoring investment risks

The Trustee considers that there are several 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

¹ More details, including the underlying assumptions, available on request.

certain financial and economic conditions in the short term. This risk has been considered 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. Illiquidity/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 and by investing in income generating assets, where appropriate.

2.5. Environmental, social and governance (ESG) risks

Environmental, social and corporate governance (ESG) factors are sources of risk to the Scheme's investments, 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 is subject to credit risk because it invests in bonds via pooled funds. The Trustee manages the Scheme's exposure to credit risk by only investing in pooled funds that have a diversified exposure to different credit issuers. The Scheme is indirectly exposed to credit risks arising from the underlying investments held by the pooled funds, for example where they invest in bonds. The indirect exposure to credit risk arises from the Scheme's investments in diversified growth funds and from the emerging market multi-asset fund. The Scheme also holds bond investments, within the LDI and absolute return bond funds.

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. The magnitude of credit 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 bonds.

2.8. Currency risk

Whilst the majority of the currency exposure of the Scheme's assets is to Sterling, the Scheme is subject to currency risk because some of the Scheme's investments are held in overseas markets. The Trustee considers the overseas currency exposure in the context of the overall investment strategy, and believes that the currency exposure that exists diversifies the strategy and is appropriate. Furthermore, the Trustee manages the amount of currency risk by investing in pooled funds that hedge currency.

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 and interest rate 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, inflation and overseas currency risks to be generally unrewarded investment risks.

As a result, the Trustee aims to hedge around 50% of the Scheme's exposure to interest rate risk and 50% of the Scheme's exposure to inflation risk, by investing in leveraged LDI arrangements managed by Insight. The Trustee is also considering establishing a de-risking mechanism which would increase the level of hedging over time as the Scheme's funding level improves.

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.

The Trustee will monitor the effectiveness of the matching assets as a hedge of Scheme liabilities on a quarterly basis and review the strategy if the movement on the matching assets is not within 80-125% of the movement in hedged portion of liabilities driven by interest rates and inflation.

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.

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

Manager	Asset Class	Fund	Target allocation	Benchmark Index	Objective	Pricing/ Liquidity
L&G	UK equities	UK Equity Index Fund	13%	FTSE All-Share Index	To track the performance of the benchmark Index to within +/-0.25% p.a. for two years out of three.	Weekly
		North America Equity Index Fund		FTSE All World North America Index	To track the performance of the benchmark Index to within +/-0.5% p.a. for two years out of three.	Weekly
		North America Equity Index Fund (GBP hedged)		FTSE All World North America Index – GBP hedged	To track the performance of the benchmark Index to within +/-0.5% p.a. for two years out of three.	
		Europe (ex UK) Equity Index Fund	14%	FTSE All World Developed Europe ex UK Index	To track the performance of the benchmark Index to within +/-0.5% p.a. for two years out of three.	
		Europe (ex UK) Equity Index Fund (GBP hedged)		FTSE All World Developed Europe ex UK Index – GBP hedged	To track the performance of the benchmark Index to within +/-0.5% p.a. for two years out of three.	
L&G	Overseas equities ¹	Japan Equity Index Fund		FTSE All World Japan Index	To track the performance of the benchmark Index to within +/-0.5% p.a. for two years out of three.	
		Japan Equity Index Fund (GBP hedged)		FTSE All World Japan Index – GBP hedged	To track the performance of the benchmark Index to within +/-0.5% p.a. for two years out of three.	
		Asia Pacific (ex Japan) Equity Index Fund		FTSE All World Developed Asia Pacific ex Japan	To track the performance of the benchmark Index to within +/-0.75% p.a. for two years out of three.	
		Asia Pacific (ex Japan) Equity Index Fund (GBP hedged)		FTSE All World Developed Asia Pacific ex Japan – GBP hedged	To track the performance of the benchmark Index to within +/-0.75% p.a. for two years out of three.	
Ruffer	Diversified growth	Absolute Return Fund	4.5%	No formal benchmark. Trustee monitors against 3 month LIBOR	No formal objective. Trustee monitors against the benchmark + 4% pa.	Daily
Baillie Gifford	Diversified growth	Multi Asset Growth Fund	4.5%	No formal benchmark. Trustee monitors against objective.	To return UK Base Rate +3.5% pa net of fees, over rolling five-year periods; and with annualised volatility of less than 10% over rolling five-year periods.	Daily

Appendix 3 (cont)

Manager	Asset Class	Fund	Target allocation	Benchmark Index	Objective	Pricing/ Liquidity
Capital	Emerging market multi-asset	Emerging Market Total Opportunities Fund	10%	50% MSCI Emerging Market Index; 25% JPMorgan Government Bond Index – Emerging Markets Global Diversified; and 25% JPMorgan Emerging Markets Bond Index Global	To achieve long-term capital growth with relatively low volatility of returns and capital preservation.	Daily
Aberdeen Standard	Property	Pooled Property Pension Fund	4%	AREF/IPD UK Property Funds Index – All Balanced Funds (weighted average)	To outperform the benchmark over rolling 3 year periods (after fees).	Daily
Hermes	Property	Hermes Property Unit Trust	4%	IPD UK Other Balanced Funds Index	To outperform the benchmark by 0.5%pa net of fees on a three-year rolling basis.	Quarterly
IFM	Infrastructure	Global Infrastructure Fund	4%	N/A	To return 10% pa (after fees) over the long-term (10+ years)	Quarterly
Insight	Absolute return bonds	Bonds Plus Fund		3 month LIBOR	To outperform benchmark by 2% pa (before tax, fees and expenses) over rolling five year periods.	Daily
	LDI portfolio	Dynamic LDI Fund range	42.0%	Leveraged gilt and swap-based benchmarks	To provide a hedge against nominal rate and inflation-linked liabilities by the use of a number of hedging assets.	Daily
L&G	Cash	Sterling Liquidity Fund	0%	7 Day LIBID	To perform in line with the benchmark, maintain high levels of liquidity and preserve capital. Used as collateral for the LDI portfolio	Daily

¹The Trustee has a preference for passive (index-tracking) management in developed equity markets. This form of management is low cost and provides performance which is close to market returns. Around 80% of the overseas equities are invested in index-tracking funds that are currency hedged to Sterling and 20% in equivalent unhedged funds.

Investment manager arrangements (cont)

A working balance of cash is held in the Trustee's bank account for payment of benefits, expenses etc. It is not the Trustee's intention to hold large amounts of cash in the bank account and this is monitored by the Trustee.

All the funds are open-ended but liquidity varies by fund. As all of the funds are pooled, the respective managers are responsible for arranging custody of the assets of the fund. As such, the Trustee does not have a direct relationship with the custodian.

All of the Scheme's funds with the exception of the property and infrastructure mandates are accessed via an investment only platform arrangement with L&G.

Rebalancing between managers

The Trustee has used rebalancing mechanism for assets and monitors the asset allocation relative to the benchmark allocations quarterly.

Additional Voluntary Contributions

Some members obtain further benefits by paying AVCs to the Scheme. The liabilities in respect of these AVCs are equal to the investments bought by the contributions.

The Trustee has made unit-linked and with-profits funds available through AEGON. A policy document has been issued to the Trustee from AEGON covering the AVC investment contract. From time to time the Trustee reviews the choice of investments available to members to ensure that they remain appropriate to the members' needs.

