Seventh-day Adventist Retirement Plan

Statement of Investment Principles

September 2020

1 Introduction

1.1 This is the Statement of Investment Principles prepared by the Trustees of the Seventh-day Adventist Retirement Plan ("the Plan"). This statement sets down the principles governing decisions about investments for the Plan to meet the requirements of:

- the Pensions Act 1995, as amended by the Pensions Act 2004;
- the Occupational Pension Schemes (Investment) Regulations 2005, as amended by the Occupational Pension Plans (Investment) (Amendment) Regulations 2010;
- the Occupational Pension Schemes (Investment) (Amendment) Regulations 2018; and
- the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019.

1.2 In preparing this statement the Trustees have consulted the British Union Conference of Seventh-day Adventists, the Principal Employer, and obtained advice from Barnett Waddingham LLP, the Trustees' investment consultants. Barnett Waddingham is authorised and regulated by the Financial Conduct Authority for a range of investment business activities.

1.3 This statement has been prepared with regard to the 2001 Myners review of institutional investment (including subsequent updates), and Scheme Funding legislation.

1.4 The Trustees will review this statement at least every three years or if there is a significant change in the policy on any of the areas covered by the statement.

1.5 The investment powers of the Trustees are set out in Clause 51 of the Definitive Trust Deed & Rules, dated 30 March 2000. This statement is consistent with those powers.

2 Choosing Investments

2.1 The Trustees' policy is to set the overall investment target and then monitor the performance of their managers against that target. The monitoring takes into account both short term and long term performance. In doing so, the Trustees consider the advice of their professional advisers, who they consider to be suitably qualified and experienced for this role.

2.2 The day-to-day management of the Plan's assets is delegated to one or more fund managers. The Plan's fund managers are detailed in Appendix 1 to this Statement. The fund managers are authorised and regulated by the Financial Conduct Authority, and are responsible for stock selection and the exercise of voting rights.

2.3 The Trustees review the appropriateness of the Plan's investment strategy on an ongoing basis. This review includes consideration of the continued competence of the fund managers with respect to performance within any guidelines set. The Trustees will also consult the employers before amending the investment strategy.

3 Investment Objectives

3.1 The Trustees have discussed key investment objectives in light of an analysis of the Plan's liability profile as well as the constraints the Trustees face in achieving these objectives. As a result, the Trustees' main investment objectives are:

- to ensure that the Plan can meet the members' entitlements under the Trust Deed and Rules as they fall due;
- to achieve a long term positive real return;
- to manage the expected volatility of the returns achieved in order to control the level of volatility in the Plan's required contribution levels;

- to invest in assets of appropriate liquidity which will generate income and capital growth to meet, together with new contributions from the participating employers, the cost of current benefits which the Plan provides;

- to reduce the risk of the assets failing to meet the liabilities over the long term; and

- to minimise the long-term costs of the Plan by maximising the return on the assets whilst having regard to the above objectives.

3.2 The Trustees are aware of the relationship that exists between the particular investment portfolio that is held and the level of funding of the Plan's liabilities. The Trustees have obtained exposure to investments that they expect will meet the Plan's objectives as best as possible.

4 Kinds of investments to be held

4.1 The Plan can invest in a wide range of asset classes with the aim of being socially responsible and ethical, including:

- Equities;

- Bonds;

- Cash;

- Property

- Alternatives, including private equity, commodities, hedge funds, infrastructure, currency, high yield debt and derivatives;

- Annuity policies.

4.2 Any investment in derivative instruments is only made to contribute to a reduction in the overall level of risks in the portfolio or for the purposes of efficient portfolio management.

4.3 No investment in employer-related investments is permitted, except where this is by virtue of inclusion in an index which any managers are benchmarked against, or in the form of contingent assets for the Plan.

5 The balance between different kinds of investments

5.1 The Plan invests in assets that are expected to achieve the Plan's objectives. The allocation between different asset classes is contained within Appendix 1 to this Statement.

5.2 The Trustees consider the merits of both active and passive management for the various elements of the portfolio and may select different approaches for different asset classes. The current arrangements are set out in Appendix 1 to this Statement.

5.3 From time to time the Plan may hold cash and therefore deviate from its strategic or tactical asset allocation in order to accommodate any short term cashflow requirements or any other unexpected items.

5.4 The Trustees are aware that the appropriate balance between different kinds of investments will vary over time and therefore the Plan's asset allocation will be expected to change as the Plan's liability profile matures.

6 Risks

6.1 The Trustees have considered the following risks for the Plan with regard to its investment policy and the Plan's liabilities, and has considered ways of managing/monitoring these risks:

6.2 **Risk versus the liabilities** The Trustees will monitor and review the investment strategy with respect to the liabilities following each actuarial valuation. The investment strategy will be set with consideration of the appropriate level of risk required for the funding strategy as set out in the Plan's Statement of Funding Principles.

6.3 **Asset Allocation risk** The asset allocation is detailed in Appendix 1 to this Statement and is monitored on a regular basis by the Trustees.

6.4 **Fund manager risk** The Trustees monitor each of the Plan's fund manager's performance on a regular basis in addition to having meetings with each manager from time to time as necessary. The Trustees have a written agreement with each fund manager, which contains a number of restrictions on how each fund manager may operate.

6.5 **Concentration risk** Each fund manager is expected to manage broadly diversified portfolios and to spread assets across a number of individual shares and securities.

6.6 **Loss of investment** The risk of loss of investment by each fund manager and custodian is assessed by the Trustees. This includes losses beyond those caused by market movements (e.g. default risk, operational errors or fraud).

6.7 **Liquidity risk** The Plan invests in assets such that there is a sufficient allocation to liquid investments that can be converted into cash at short notice given the Plan's cash flow requirements. The employers working with the Plan's administrators assess the level of cash held in order to limit the impact of the cash flow requirements on the investment policy.

6.8 **Covenant risk** The creditworthiness of the employers and the size of the pension liability relative to the employers' earnings are monitored on a regular basis. The appropriate level of investment risk is considered with reference to the strength of the employer covenant.

6.9 **Solvency and mismatching** Risk is addressed through the asset allocation strategy and ongoing triennial actuarial valuations. The Trustees are aware that the asset allocation required to minimise the volatility of the solvency position may be different from that which would minimise the volatility on the Plan's funding basis.

6.10 **Currency risk** The Plan's liabilities are denominated in sterling. The Plan may gain exposure to overseas currencies by investing in assets that are denominated in a foreign currency or via currency management. Currency hedging may be employed to manage the impact of exchange rate fluctuations.

6.11 **Governance risk** Each fund manager is expected to undertake good stewardship and positive engagement in relation to the assets held. The Trustees monitor these and will report on the managers' practices in their annual Implementation Statement.

6.12 **ESG/Climate risk** The Trustees have considered long-term financial risks to the Plan and ESG factors as well as climate risk are potentially financially material and will continue to develop its policy to consider these, alongside other factors, when selecting or reviewing the Plan's investments in order to avoid unexpected losses.

7 Expected return on investments

7.1 The Trustees have regard to the relative investment return and risk that each asset class is expected to provide. The Trustees are advised by their professional advisors on these matters, who they deem to be appropriately qualified experts. However, the day-to-day selection of investments is delegated to the fund managers.

7.2 The Trustees recognise the need to distinguish between nominal and real returns and to make appropriate allowance for inflation when making decisions and comparisons.

7.3 In considering the expected return from investments, the Trustees recognise that different asset classes have different long-term expected returns and expected volatilities relative to the liabilities.

7.4 Having established the investment strategy, the Trustees monitor the performance of each fund manager against an agreed benchmark as frequently as appropriate according to market conditions and the Plan's funding position. The Trustees meet the Plan's fund managers as frequently as is appropriate, normally on an annual basis, in order to review performance.

8 Realisation of investments

8.1 The Trustees have delegated the responsibility for buying and selling investments to the fund managers. The Trustees have considered the risk of liquidity as referred to above.

8.2 Ultimately, the investments will all have to be sold when the Plan's life comes to an end. In this situation, the Trustees are aware of the fact that the realisable value of some investments, were there to be a forced sale, might be lower than the market value shown in the Plan accounts.

9 Financially material considerations, non-financial matters, the exercise of voting rights, engagement and arrangements with fund managers

9.1 The Trustees have set policies in relation to these matters. These policies are set out in Appendix 2.

10 Agreement

10.1 This statement was agreed by the Trustees, following consultation with the Principal Employer, and replaces any previous statements. Copies of this statement and any subsequent amendments will be made available to the employers, the fund managers, the actuary and the Plan auditor upon request.

Signed: Victor Pilmoor (Chair)………………………… **Date:** 15 October 2020…………

On behalf of the Seventh-day Adventist Retirement Plan

Appendix 1 Note on investment policy of the Plan as at September 2020 in relation to the current Statement of Investment Principles

Choosing investments

The Trustees have appointed the following fund managers to carry out the day-to-day investment of the fund:

- Legal & General Assurance (Pensions Management) Limited, who have delegated the investment responsibility to Legal & General Investment Management Limited (Legal & General).

The fund managers are authorised and regulated by the Financial Conduct Authority.

The Trustees have appointed Barnett Waddingham LLP to advise on investment matters.

The fees charged by Legal & General are a flat charge of £1,000 p.a. plus the annual fund management charges set out in the table below.

Fund	Fees
Legal & General	
Ethical UK Equity Index Fund	0.20% p.a.
Ethical Global Equity Index Fund	0.30% p.a.
Ethical Global Equity Index Fund – GBP Hedged	0.325% p.a.
Index-linked Gilt Funds	0.100% p.a. of the first £5m, 0.075% p.a. of the next £5m, 0.050% p.a. of the next £20m, 0.030% p.a. of the balance above £30m
LPI Income Property Fund	0.400% p.a. of the first £7.5m, 0.350% p.a. of the next £12.5m, 0.300% p.a. of the balance above £20m

Barnett Waddingham is remunerated on a time-cost basis.

Kinds of investments to be held

The Trustees have considered all asset classes and have gained exposure to the following asset classes:

- UK Equities
- Overseas Equities
- Index Linked Gilts
- Property

The balance between different kinds of investment and rebalancing

The asset allocation has been agreed after considering the Plan's liability profile, funding position, expected return of the various asset classes, the need for diversification and the employers' strategy and covenants.

The investment benchmarks and objectives for each fund manager are given below:

Fund	Benchmark	Objective
Legal & General		
Ethical UK Equity Index Fund	FTSE4Good UK Index	To track the benchmark +/-0.5% p.a. for two years out of three.
Ethical Global Equity Index Fund	FTSE4Good Global Equity Index	
Ethical Global Equity Index Fund – GBP Hedged	FTSE4Good Global Equity Index – GBP Hedged	
LPI Income Property Fund	Not applicable	To provide an income stream that rises annually in line with LPI (RPI between 0% and 5%).
2040 Index-Linked Gilt Fund	Single stock treasury	To provide exposure to an underlying single stock Index Linked gilt
2042 Index-Linked Gilt Fund		
2047 Index-Linked Gilt Fund		
2050 Index-Linked Gilt Fund		
2055 Index-Linked Gilt Fund		
2058 Index-Linked Gilt Fund		
2062 Index-Linked Gilt Fund		
2068 Index-Linked Gilt Fund		

The performance of fund managers will be monitored as frequently as the Trustees consider appropriate in light of the prevailing circumstances. The monitoring takes into account both short term and long term performance.

The Plan has a strategic asset allocation as set out in the table below. The Trustees recognise that the asset allocation of investments in different asset classes will vary over time as a result of market movements. The Trustees seek to maintain a balance between maintaining the asset allocation in line with its benchmark and limiting the costs of rebalances. The Trustees will consider the control ranges detailed in the table below when deciding whether to rebalance. They also recognise that the balance between growth and protection assets is expected to change over time as the Plan's liability profile matures with the allocation moving towards a greater weighting to protection assets.

The composition of the index-linked gilts portfolio was revised in July 2020 and the figures shown in the table below reflect the allocations as at that date. These allocations are expected to diverge from their initial allocations, and so do not have control ranges to consider.

Fund	Allocation	Control Range
Growth Portfolio	**50%**	**± 4%**
Ethical UK Equity Index Fund	8%	± 3%
Ethical Global Equity Index Fund	10%	± 3%
Ethical Global Equity Index Fund – GBP Hedged	22%	± 3%
LPI Income Property Fund	10%	± 3%
Protection Portfolio	**50%**	**± 4%**
2040 Index-Linked Gilt Fund	8.6%	None
2042 Index-Linked Gilt Fund	4.2%	
2047 Index-Linked Gilt Fund	19.7%	
2050 Index-Linked Gilt Fund	0.2%	
2055 Index-Linked Gilt Fund	4.2%	
2058 Index-Linked Gilt Fund	7.1%	
2062 Index-Linked Gilt Fund	0.3%	
2068 Index-Linked Gilt Fund	5.7%	
Total	**100%**	

Investment of new money

New money is invested to rebalance the overall asset allocation towards its overall benchmark, excluding the LPI Income Property Fund as there is a queue for investing here.

Realisation of investments

Disinvestments to meet the Plan's cash flow requirements are made to move the overall asset allocation into line with its overall benchmark. There is a nine-month notice period for selling units in the LPI Income Property Fund (which can be waived the manager's discretion) so it may not be possible to disinvest from here to meet immediate cashflow needs.

In addition, the Trustees make use of Legal & General's Notional Income Service to provide a monthly income stream from the Plan's assets.

Appendix 2 Note on financially material considerations, non-financial matters, the exercise of voting rights, engagement and arrangements with fund managers

1. Policy on financially material considerations

The Trustees believe that environmental, social and governance ("ESG") factors, including but not limited to climate change, are financially material and therefore have a policy to review these, alongside other factors, when selecting or reviewing the Plan's investments. Given the maturity profile of the Plan and the objective to fund future member benefits from the Plan as they fall due, the Trustees have a long-term horizon over which it takes into account the financial materiality of ESG factors (including, but not limited to, climate change). This is likely to be not less than five years from the date of this Statement of Investment Principles.

The Trustees have elected to invest the Plan's assets through pooled funds. The choice of underlying funds is made by the Trustees after taking advice from their investment consultant. The Trustees, and the managers of the underlying funds, take into account ESG factors (including climate change risks) in their decisions in relation to the selection, retention and realisation of investments.

The Trustees take those factors into account in the selection, retention and realisation of investments as follows:

Selection of investments: assess the fund managers' ESG integration credentials and capabilities, including stewardship, as a routine part of requests for information/proposals as well as through other regular reporting channels.

Retention of investments: Developing a robust monitoring process in order to monitor ESG considerations on an ongoing basis by regularly seeking information on the responsible investing policies and practices of the fund managers.

Realisation of investments: The Trustees will request information from fund managers about how ESG considerations are taken into account in decisions to realise investments.

The Trustees will also take those factors into account as part of its investment process to determine a strategic asset allocation, and consider them as part of ongoing reviews of the Plan's investments.

The Trustees' views on how the ESG factors are taken into account for the Plan's investments are set out below:

Passively managed equity funds:

The Trustees believe that ESG issues will be financially material to the risk-adjusted returns achieved by the Plan's passive equities over the Trustees' intended time horizon. The Trustees have decided that the passive equity portfolio held with Legal and General should be managed using an "ethical" approach that excludes investments in certain areas as well as investments below a certain ESG factor based score. The current specific exclusions are for producers of tobacco, weapons and coal. Nuclear power generators must meet specific health & safety indicators.

The Trustees accept that fund managers must invest in line with the specified index and, therefore, may not be able to disinvest if they have concerns relating to ESG. The Trustees therefore require that the fund manager takes into account ESG considerations by engaging with companies and by exercising voting rights. However, the process for incorporating ESG issues should be consistent with, and proportionate to, the rest of the investment process.

The Plan's current passive manager LGIM is a large and long-term investor, and engages with companies (including those in the indices that the Plan invests in) on matters including wider ESG factors and climate change on a regular basis. These engagement activities are set our under the Trustees' stewardship policy below.

Passively managed gilt funds:

The Trustees do not believe there is significant scope for ESG issues to improve risk-adjusted returns within the Plan's passive gilt holdings.

Property:

The Trustees believe that ESG factors will be potentially financially material to the risk-adjusted returns achieved by the Plan's property manager. Environmental issues are particularly important when selecting appropriate properties for the property portfolios, and the Trustees look to the manager to incorporate ESG issues into their investment process where appropriate.

General points:

The Trustees will continue to monitor and assess ESG factors, and risks and opportunities arising from them, as follows:

- The Trustees will obtain regular training on ESG considerations in order to understand fully how ESG factors including climate change could impact the Plan and its investments;
- As part of ongoing monitoring of the Plan's fund managers, the Trustees will use any ESG ratings information available within the pensions industry or provided by its investment consultant, to assess how the Plan's fund managers take account of ESG issues; and
- Through their investment consultant the Trustees will request that all of the Plan's fund managers provide information about their ESG policies, and details of how they integrate ESG into their investment processes on an annual basis.

2. Policy on non-financial matters

The Trustees have a preference for only investing in equities that have been screened and deemed to be ethical. Only funds with specific ethical criteria will apply these. The Trustees will aim to avoid direct investment in companies whose direct primary business is related to alcohol, tobacco, proscribed drugs, gambling and armaments.

In addition, whenever possible, the Trustees will prefer a particular investment which they believe to be more socially responsible as opposed to one that is less socially responsible. For this purpose socially responsible means that the investment seeks to contribute positively rather than negatively to the economy, environment and society in which the investment is made.

The Trustees do not take into account any other non-financial matters, such as the Plan members' and beneficiaries' views on ethical considerations, or present and future quality of life of the members and beneficiaries of the Plan (i.e., "non-financial matters" in the relevant regulations) in the selection, retention and realisation of investments.

3. The exercise of voting rights

The Trustees' policy on the exercise of rights attaching to investments, including voting rights, and in undertaking engagement activities in respect of the investments is that these rights should be exercised by the fund managers on the Trustees' behalf. In doing so, the Trustees expect that the fund managers will use their influence as major institutional investors to exercise the Trustees' rights and duties as shareholders, including where appropriate engaging with underlying investee companies to promote good corporate governance, accountability and to understand how those companies take account of ESG issues in their businesses.

The Trustees will monitor and engage with the fund managers about relevant matters (including matters concerning an issuer of debt or equity, including their performance, strategy, capital structure, management of actual or potential conflicts of interest, risks, social and environmental impact and corporate governance), through the Plan's investment consultant.

Fund managers will be asked to provide details of their stewardship policy and engagement activities on at least an annual basis. The Trustees will, with input from their investment consultant, monitor and review the information provided by the fund managers. Where possible and appropriate, the Trustees will engage with their fund managers for more information and ask them to confirm that their policies comply with the principles set out in the Financial Reporting Council's UK Stewardship Code.

4. Engagement activities

The Trustees acknowledge the importance of ESG and climate risk within their investment framework. When delegating investment decision making to their fund managers they provide their fund managers with a benchmark they expect the fund managers to either follow or outperform. The fund manager has discretion over where in an investee company's capital structure it invests (subject to the restrictions of the mandate), whether directly or as an asset within a pooled fund.

The Trustees are of the belief that ESG and climate risk considerations extend over the entirety of a company's corporate structure and activities, i.e. that they apply to equity, credit and property instruments or holdings. The Trustees also recognise that ESG and climate related issues are constantly evolving and along with them so too are the products available within the fund management industry to help manage these risks.

The Trustees consider it to be a part of their fund managers' roles to assess and monitor developments in the capital structure for each of the companies in which the managers invest on behalf of the Plan or as part of the pooled fund in which the Plan holds units.

The Trustees also considers it to be part of their fund managers' roles to assess and monitor how the companies in which they are investing are managing developments in ESG related issues, and in particular climate risk, across the relevant parts of the capital structure for each of the companies in which the managers invest on behalf of the Plan.

Should a fund manager be failing in these respects, this should be captured in the Plan's regular performance monitoring.

The Plan's investment consultant is independent and no arm of their business provides asset management services. This, and their FCA Regulated status, makes the Trustees confident that the fund manager recommendations they make are free from conflict of interest.

The Trustees expect all fund managers to have a conflict of interest policy in relation to their engagement and ongoing operations. In doing so the Trustees believe they have managed the potential for conflicts of interest in the appointment of the fund manager and conflicts of interest between the Trustees/fund manager and the investee companies.

In selecting and reviewing their fund managers, where appropriate, the Trustees will consider fund managers' policies on engagement and how these policies have been implemented.

5. Policy on arrangements with fund managers

Incentivising alignment with the Trustees' investment polices

Prior to appointing the fund manager, the Trustees will discuss the fund manager's benchmark and approach to the management of ESG and climate related risks with the Plan's investment consultant, and how they are aligned with the Trustees' own investment aims, beliefs and constraints.

When appointing a fund manager, in addition to considering the fund manager's investment philosophy, process and policies to establish how the manager intends to make the required investment returns, the Trustees will also consider how ESG and climate risk are integrated into these. If the Trustees deem any aspect of these policies to be out of line with their own investment objectives for the part of the portfolio being considered, they may use another manager for the mandate.

The Trustees carry out a strategy review at least every 3 years where they assess the continuing relevance of the strategy in the context of the Plan and their aims, beliefs and constraints. The Trustees will monitor the fund managers' approach to ESG and climate related risks on an annual basis.

In the event that the fund manager ceases to meet the Trustees' desired aims, including the management of ESG and climate related risks, using the approach expected of them, their appointment may be terminated. The fund managers have been informed of this by the Trustees.

Fund manager ESG policies are reviewed in the context of best industry practice and feedback will be provided to the fund manager from time to time as deemed appropriate.

Incentivising assessments based on medium to long term, financial and non-financial considerations

The Trustees are mindful that the impact of ESG and climate change may have a long-term nature. However, they are aware that the need to change their current pathway is great. The Trustees recognise that the potential for change in value as a result of ESG and climate risk, may occur over a much shorter term than climate change itself. The Trustees have acknowledged this in their investment management arrangements.

When considering the management of objectives for a fund manager (including ESG and climate risk objectives), and then assessing their effectiveness and performance, the Trustees assess these over an agreed predetermined rolling timeframe. The Trustees believe the use of rolling timeframes, typically 3 to 5 years, is consistent with ensuring the fund manager makes decisions based on an appropriate time horizon. Where a fund may have an absolute return or shorter term target, this is generally supplementary to a longer term performance target. In the case of assets that are actively managed, the Trustees expect this to be sufficient to ensure an appropriate alignment of interests.

The Trustees expect fund managers to be voting and engaging on behalf of the Plan's holdings and the Plan monitors this activity within the Implementation Statement in the Plan's Annual Report and Accounts. The Trustees do not expect ESG considerations to be disregarded by the fund manager in an effort to achieve any short term targets.

Method and time horizon for assessing performance

Trustees monitor the performance of their fund managers over the medium to long time periods that are predetermined and consistent with the Trustees' investment aims, beliefs and constraints.

The Plan invests solely in pooled funds. The fund managers are remunerated by the Trustees based on the assets they manage on behalf of the Trustees. As the funds grow, due to successful investment by the fund manager, they receive more and as values fall they receive less. In some instances, a performance fee may also be applied. Details of the fee structures for the Plan's fund managers are contained in the Fee agreements section mentioned above in Appendix 1.

The Trustees believe that this fee structure, including the balance between any fixed and performance related element, enables the fund managers to focus on long-term performance without worrying about short term dips in performance significantly affecting their revenue.

The Trustees ask the Plan's investment consultant to assess if the investment management fee is in line with the market when the manager is selected, and the appropriateness of the investment management charges are considered every three years as part of the review of the Statement of Investment Principles.

Portfolio turnover costs

The Trustees acknowledge that portfolio turnover costs can impact on the performance their investments. Overall performance is assessed as part of the regular investment monitoring process.

During the fund manager appointment process, the Trustees will consider both past and anticipated portfolio turnover levels. When underperformance is identified deviations from the expected level of turnover may be investigated with the fund manager concerned if it is felt they may have been a significant contributor to the underperformance. Assessments reflect the market conditions and peer group practices.

The Trustees acknowledge that for some asset classes, such as LDI, a higher turnover of contracts such as repurchase agreements, can be beneficial to the fund from both a risk and cost perspective.

Duration of arrangement with fund manager

For the pooled funds in which the Plan currently invests, there are no predetermined terms of agreement with the fund managers.

The suitability of the Plan's asset allocation and its ongoing alignment with the Trustees' investment aims, beliefs and constraints is assessed every three years, or when changes deem it appropriate to do so more frequently. As part of this review the ongoing appropriateness of the fund managers, and the specific funds used, is assessed.