

# Tamworth Co-operative Society Limited Employees' Superannuation Fund

Statement of Investment Principles

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## 1 Background

<b>Purpose of Statement</b>	This Statement sets out the principles governing decisions relating to the investment of the assets of the Tamworth Co-operative Society Limited Employees' Superannuation Fund (the Scheme).
<b>Nature of Scheme</b>	The Scheme is an occupational pension scheme set up under trust and registered with HM Revenue and Customs (HMRC).
<b>Compliance with Legislation</b>	The Statement has been prepared to comply with Section 35 of the Pensions Act 1995, Section 244 of the Pensions Act 2004, the Occupational Pension Scheme (Investment) Regulations 2005, the Pension Protection Fund (Pensionable Service) and Occupational Pension Scheme (Investment and Disclosure) (Amendment and Modification Regulations 2018), and the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019.
<b>Availability to Members</b>	A copy of this Statement will be made available to Scheme members on request to the Trustees.
<b>Investment Advice</b>	<p>The Trustees have obtained and considered professional advice on the content of this Statement from Broadstone Corporate Benefits Limited (Broadstone), their appointed investment adviser. Broadstone has confirmed to the Trustees that it has the appropriate knowledge and experience to give the advice required under legislation.</p> <p>The Trustees will obtain such advice as they consider appropriate and necessary whenever they intend to review or revise this Statement.</p>
<b>Consultation with the Sponsoring Employer</b>	<p>The Trustees have consulted the Sponsoring Employer, the Tamworth Co-operative Society Limited, when setting their investment objectives and strategy, and in the preparation of this Statement.</p> <p>Responsibility for maintaining the Statement and determining the Scheme's investment strategy rests solely with the Trustees.</p>
<b>Investment Powers</b>	The Trustees' investment powers are set out in Rule 31 of the Scheme's Rules dated 22 September 2004. The powers granted to the Trustees under this Rule are wide and this Statement is consistent with those powers.

## 2 Investment Objectives

<b>Strength of Employer Covenant</b>	<p>The Trustees have considered the Sponsoring Employer's ability to support the Scheme in determining their investment objectives and strategy, and consider it to be sufficiently strong to take a long-term view.</p>
<b>Key Funding Measure</b>	<p>The Scheme is subject to the Statutory Funding Objective (SFO) introduced by the Pensions Act 2004, i.e. that it should have sufficient and appropriate assets to cover its Technical Provisions, as calculated in accordance with the Trustees' Statement of Funding Principles.</p> <p>The Trustees have agreed that the funding position measured under the SFO is the assessment of scheme funding that is of most importance to the Trustees, the Sponsoring Employer, and members, as it determines the Scheme's funding requirements.</p>
<b>Investment Objectives</b>	<p>The Trustees' investment objectives are as follows:</p> <ul style="list-style-type: none"><li>• To ensure that the assets are of a nature to enable the Trustees to meet the Scheme's benefits as they fall due.</li><li>• To invest the Scheme's assets in an appropriately diverse and liquid range of investments.</li><li>• To invest in a way that is consistent with the Scheme's funding objectives, i.e. to invest so that the investment return assumptions used to determine the Trustees' funding plan have a reasonable chance of being achieved in practice.</li><li>• To target a level of exposure to downside equity-like risk of around 50% of the Scheme's assets.</li><li>• Where future opportunities arise, the Trustees will consider further steps to reduce the volatility of the Scheme's funding position and thereby improve the security of members' benefits.</li></ul>
<b>Paying Regard to the Sponsoring Employer's Views</b>	<p>The Trustees will have regard to the Sponsoring Employer's views on the potential costs and risks associated with the investment objectives set and their implementation through the practical strategy.</p>

### 3 Principles for Setting the Investment Strategy

#### **Selection of Investments**

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

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

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

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

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

#### **Balance of Investments**

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

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

#### **Delegation to Investment Managers**

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

#### **Realising Investments**

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



## 4 Setting the Strategy

### Target Asset Allocation

The Target Asset Allocation for the Scheme's assets is as follows:

Asset Class	Target Asset Allocation
Global equities – GBP Hedged	20%
Risk controlled multi-asset	20% ± 5%
Multi-asset income	40%
Liability Driven Investment (LDI) solution	20% ± 5%
<b>Total</b>	<b>100%</b>

The balance between the risk-controlled multi-asset and LDI funds will vary with market conditions and will be maintained to target the agreed hedging levels against changes in the long-term interest rates and inflation expectations.

The ranges provided for the Target Asset Allocation illustrate a reasonable range of allocations between the risk-controlled multi-asset and LDI funds that might be expected in the normal course of events.

### Investment Manager

The Trustees entered into a contract with Legal & General Investment Management Limited (LGIM) on 25 August 2004. LGIM undertakes the day-to-day investment management of the Scheme's assets.

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

### Strategies Used

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

Fund
<b>Global equities</b>
LGIM All World Equity Index Fund – GBP Hedged
<b>Risk controlled multi-asset</b>
LGIM Dynamic Diversified Fund
<b>Multi-asset income</b>
LGIM Retirement Income Multi-Asset Fund
<b>LDI solution</b>
LGIM Matching Core Funds

**Target Asset Allocation (excluding LDI)**

For the funds which do not form part of the LDI solution the target asset allocation is as follows:

Fund	Target Asset Allocation
<b>UK equities</b>	
LGIM All World Equity Index Fund – GBP Hedged	25.0%
<b>Risk controlled multi-asset</b>	
LGIM Dynamic Diversified Fund	25.0%
<b>Multi-asset income</b>	
LGIM Retirement Income Multi Asset Fund	50.0%
<b>Total (excluding LDI solution)</b>	<b>100.0%</b>

**Target Hedging Ratios**

For the funds which form part of the LDI solution, the target hedging ratios, assuming full funding, are as follows:

Liability Driven Investment funds	Target Hedging Ratio
Long-term interest rates	75%
Long-term inflation expectations	75%

**Maintaining the Target Asset Allocation**

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

**Performance Benchmarks and Objectives**

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

Fund name	Benchmark	Tracking Criterion
LGIM All World Equity Index Fund – GBP Hedged	FTSE All World Index – GBP Hedged	To track the benchmark to within $\pm 0.5\%$ p.a. for two years out of every three.



The risk-controlled multi-asset fund and multi-asset income fund are actively managed, with an objective to outperform a specified market benchmark. Their objectives are summarised below:

Fund name	Benchmark	Performance Objective
LGIM Dynamic Diversified Fund	Bank of England Base Rate	To outperform the benchmark by 4.5% p.a. (gross of fees) over rolling three-year periods
LGIM Retirement Income Multi Asset Fund	Bank of England Base Rate	To outperform the benchmark by 3.5% p.a. (gross of fees) over rolling three-year periods

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

#### Investment Management Charges

The annual management charges for each of the funds used, based on the assets under management, are given below:

Fund	Annual Management Charge
LGIM All World Index Fund – GBP Hedged	0.22% p.a.
LGIM Dynamic Diversified Fund	0.38% p.a.*
LGIM Retirement Income Multi Asset Fund	0.35% p.a.
LGIM Matching Core Funds	0.24% p.a.

\*Discounted from 0.50% p.a. until further notice.

In addition, LGIM charge a flat fee of £1,000 per annum.

#### Employer-Related Investment

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

#### Additional Voluntary Contributions (AVCs)

The Scheme holds AVCs separately from the assets, using a policy provided by the Royal London Mutual Insurance Society Limited.

## 5 Expected Returns and Risks

### Overall Return Target

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

The Trustees expect the assets to produce a return in excess of the growth in the value of the liabilities calculated under the SFO over an economic cycle of five to seven years of up to 1.6% per annum.

### Expected Returns

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

Asset Class	Expected return
Global equities	In excess of UK price inflation, as measured by the Retail Prices Index, and in excess of the yield currently available on long-dated gilts
Risk controlled multi-asset	Similar to the return on global equities over an economic cycle of five to seven years, but with significantly reduced volatility.
Multi-asset income	In excess of UK price inflation, as measured by the Retail Prices Index, and in excess of the market yield available on longer dated low risk assets, such as gilts, but with significantly lower volatility in returns than equities.
Liability Driven Investment (LDI) funds	In line with the sensitivity of the Scheme's Technical Provisions to changes in interest rates and inflation expectations, allowing for the target level of hedging specified by the Trustees from time to time.

### Consideration of Risks

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

### Risk Relative to the Value of the Scheme's Key Funding Measure

The Target Asset Allocation has been determined with due regard to the characteristics of the Scheme's Technical Provisions.

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

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

**Concentration  
of Risk and  
Diversification**

To reduce the risk of concentration within the portfolio, the Trustees will monitor the overall mix of asset classes used in the investment strategy with its investment adviser, Broadstone.

The Trustees invest in a wide range of asset classes through the funds and strategies they use and consider the Scheme's strategy to be well diversified.

**Manager  
Controls and  
Custodianship**

The day-to-day activities that the Investment Manager carries out for the Trustees are subject to regular internal reviews and external audits by independent auditors to ensure that operating procedures and risk controls remain appropriate.

Safe keeping of the Scheme's assets held with the Investment Manager is performed by the custodians appointed by the Investment Manager.

**Manager  
Security**

The Trustees have considered the security of the Scheme's holdings with the Investment Manager, allowing for their status as a reputable regulated firm, and consider the associated protection offered to be reasonable and appropriate.

**Monitoring and  
Management of  
Risks**

The Trustees will monitor the investment and funding risks faced by the Scheme with the assistance of their investment advisers and the Scheme Actuary at least every three years. The Trustees will consider the appropriateness of implementing additional risk mitigation strategies as part of such reviews.

In addition, the Trustees will review wider operational risks as part of maintaining their risk register.



## 6 Responsible Investing, Governance and Engagement

### Financially Material Considerations Related to Environmental, Social and Governance Considerations

The Trustees recognise that Environmental, Social and Governance (ESG) issues can and will have a material impact on the companies, governments and other organisations that issue or otherwise support the assets in which the Scheme invests. In turn, ESG issues can be expected to have a material financial impact on the returns provided by those assets.

The Trustees delegate responsibility for day-to-day decisions on the selection of investments to the Investment Manager. The Trustees have an expectation that the Investment Manager will consider ESG issues in selecting investments or will otherwise engage with the issuers of the Scheme's underlying holdings on such matters in a way that is expected to improve the long-term return on the associated assets. The Trustees' views on how ESG issues are taken account of in each asset class used is set out below:

Asset Class	Active/Passive	Trustees' views
<b>Global equities</b>	Passive	The Trustees acknowledge that the investment manager must invest in line with specified indices and, therefore, may not be able to disinvest from a particular security if they have concerns relating to ESG. The Trustees do expect the investment manager to take into account ESG considerations by engaging with companies that form the index, and by exercising voting rights on these companies.
<b>Risk-controlled multi-asset funds / multi-asset income</b>	Active	The Trustees expect the investment manager to take financially material ESG factors into account, given the active management style of the funds and the ability of the manager to use its discretion to generate higher risk adjusted returns. The Trustees also expect their investment manager to engage with the underlying investee companies, where possible, although they appreciate that fixed income assets within the portfolio do not typically attract voting rights.
<b>LDI</b>	Active	The underlying assets of the LDI solution consist of government bond funds and derivative contracts, with no underlying investee companies as such. Therefore, the Trustees believe there is less scope for the consideration of ESG issues to improve risk-adjusted returns in this asset class because of the nature of the securities.

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

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

**Views of  
Members and  
Beneficiaries**

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

**Engagement  
and Voting  
Rights**

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

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

**Capital  
Structure of  
Investee  
Companies**

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

**Conflicts of  
Interest**

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

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

**Incentivisation  
of Investment  
Manager**

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

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

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

## 7 Review and Monitoring

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

**Monitoring the Investment Strategy and Manager**

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

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

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

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

**Portfolio Turnover Costs**

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

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

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

**Review of Investment Manager and AVC provider**

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

**Information from the Investment Manager**

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

**Signed**

**Name**

*Mr RW ROAD*

**Date**

*14<sup>th</sup> January 2022*

On behalf of the Trustees of the Tamworth Co-operative Society Limited Employees' Superannuation Fund