Mercury Provident Pension Scheme

Statement of Investment Principles

August 2020

Contents

Glossary

AVCs	Additional Voluntary Contributions
Baillie Gifford	Baillie Gifford & Co Limited
BMO	BMO Global Asset Management
ESG	Environmental, Social and Governance (including, but not limited to, climate change)
Invesco	Invesco Asset Management Limited
Insight	Insight Investment Funds Management Limited
LDI	Liability Driven Investment
LGIM	Legal & General Investment Management Limited
Mobius	Mobius Life Limited
Scheme	Mercury Provident Pension Scheme
Trustee	The Trustee of the Scheme
UNPRI	United Nations Principles for Responsible Investment

1. Introduction

This statement is made in accordance with the requirements of legislation[1] and, in determining a suitable investment strategy for the Scheme, the Trustee has considered The Pension Regulator's Investment Guidance for defined benefit pension schemes.

The main body of this statement sets out the principles and policies that govern investments made by the Trustee of the Scheme. Details of the specific investment arrangements in place are set out in the Appendices.

Upon request, a copy of this statement will be made available to members, the Scheme Actuary and any investment managers used by the Trustee.

[1] In particular, the Pensions Act 1995, the Occupational Pensions (Investment) Regulations 2005 and the Pension Protection Fund (Pensionable Service) and Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018 and the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019.

2. Investment Governance Structure

Investment Advice

As required by legislation, in the preparation and maintenance of this statement and when considering the suitability of any investments, the Trustee will obtain and consider written advice from its investment adviser.

The Trustee is advised on investment matters by First Actuarial LLP. First Actuarial LLP is regulated by the Institute and Faculty of Actuaries and is qualified to provide the required advice through knowledge and practical experience of financial matters relating to pension schemes.

Legal Advice

Whenever deemed necessary, the Trustee will seek advice from its legal adviser on investment matters.

Employer Consultation

Under legislation, the ultimate responsibility for determining the investment strategy rests with the Trustee. However, the Trustee must consult with the sponsoring employer and consultation must comprise a sharing of views, not simply notification of intent.

Investment Managers

Day-to-day management of the Scheme’s assets is delegated to one or more investment managers.

To ensure safekeeping of the assets, ownership and day to day control of the assets is undertaken by custodian organisations which are independent of the sponsoring employer and the investment managers. Where pooled investment vehicles are used, the custodians will typically be appointed by the investment manager.

Members’ Views and Other Non-Financial Matters

In the relevant regulations “non-financial matters” refers to the views of the members. This includes, but is not limited to, ethical views, views on ESG factors and views on the present and future quality of life for the members.

The Trustee recognises that it is likely that members and beneficiaries will hold a broad range of views. However, the Trustee does not take non-financial matters into account in the selection, retention and realisation of investments. The Trustee will review its policy on whether or not to take account of non-financial matters as appropriate.

The Trustee believes that its duty to members and beneficiaries will be best served by ensuring that all benefits can be paid as they fall due and the Trustee's Investment Objectives are designed to ensure this duty is achieved.

Conflicts of Interest

The Trustee is satisfied that the investment strategy described in this Statement meets its responsibility to invest the assets in the best interests of the members and beneficiaries and, in the case of a potential conflict of interest, in the sole interest of the members and beneficiaries.

3. Investment Beliefs

The investment beliefs stated below have been developed by the Trustee and are reflected in the Scheme's investment strategy.

Appropriate Time Horizon

In determining investment objectives and a suitable investment strategy for the Scheme, the Trustee takes into account an appropriate time horizon. The appropriate time horizon will be reviewed periodically noting the inherent uncertainties in the length of time that benefits are expected to be paid from the Scheme.

Risk versus Reward

Targeting higher levels of investment return requires increased levels of investment risk which increases the volatility of the funding position.

Asset Allocation

Long-term performance of the Scheme's assets is attributable primarily to the strategic asset allocation rather than the choice of investment managers.

Diversification

Asset diversification helps to reduce risk.

Use of Pooled Funds

Taking into account the size of the Scheme's assets, it is expected that pooled funds will typically be a more practical way of implementing the Scheme's investment strategy than establishing segregated mandates with investment managers.

Use of Active Management

Active management has the potential to add value either through offering the prospect of enhanced returns or through the control of volatility. In addition, it is recognised that active management may help to mitigate the financial impact of ESG risks.

For each asset class, the Trustee will consider whether the higher fees associated with active management are justified.

ESG and Other Financially Material Considerations

The Trustee believes that financially material considerations, including ESG factors and the risks related to such factors, can contribute to the identification of both investment opportunities and financially material risks. Consequently, financially material considerations can have a material impact on investment risk and return outcomes.

The Trustee also recognises that long-term sustainability issues, particularly climate change, present risks and opportunities that increasingly may require explicit consideration.

Assessment of how ESG risks are mitigated will be one of the factors considered by the Trustee when selecting and monitoring investment managers.

Stewardship

The Trustee believes that good stewardship can help create, and preserve, value for companies and markets as a whole.

4. Investment Objectives and Strategy

Defined Benefit Assets – Investment Objectives

The Trustee's primary investment objectives are:

- to ensure that the assets are sufficient and available to pay members' benefits as and when they fall due;
- to generate an appropriate level of investment returns – to improve the funding position and thereby improve security for members; and
- to protect the funding position – limiting the scope for adverse investment experience reducing security for members.

The Trustee's investment approach is designed to strike a balance between the above primary objectives but also considers:

- the nature and timing of benefit payments;
- expected levels of investment return on different asset classes;
- expected levels of investment return variability and, specifically, the expected level of short-term volatility of the funding position;
- the sponsoring employer's ability to withstand additional contribution requirements that may arise from volatility in the funding position; and
- the full range of available investments (within the bounds of practicality).

Defined Benefit Assets – Investment strategy

The Trustee has taken advice from its investment adviser to construct a portfolio of investments consistent with these objectives. In doing so, consideration is given to all matters which are believed to be financially material over the appropriate time horizon.

The Trustee does not take account of non-financial matters when determining the Scheme's investment strategy.

AVCs

Some members have previously paid AVCs into the Scheme to provide additional benefits on their retirement. These AVCs, which are money purchase in nature, are held separately from the Scheme's other assets. The Trustee will periodically review the ongoing suitability of the AVC arrangements.

Details of the current AVC arrangements are provided in Appendix 2.

5. Use of Investment Managers

Investment Manager Selection

The Trustee delegates the day to day management of the assets, including selection, retention and realisation, to professional investment managers.

When considering the suitability of an investment manager, the Trustee (in conjunction with its investment adviser), will take account of all matters which are deemed to be financially material. In particular, the Trustee will:

- ensure that the investment manager has the appropriate knowledge and experience;
- ensure that the investment manager's mandate is appropriate; and
- consider the investment manager's approach to ESG matters.

When selecting investment managers, the Trustee may also take into account non-financially material considerations such as the investment manager's administrative capabilities and the liquidity of the investments.

Where pooled investment vehicles are used, it is recognised that the mandate cannot be tailored to the Trustee's particular requirements. However, the Trustee ensures that any pooled investment vehicles used are appropriate to the circumstances of the Scheme.

The Trustee will normally select investment managers who are signatories to the UNPRI and who publish the results of their annual UNPRI assessment. This principle may be waived if a fund offered by a non-signatory manager is deemed to have investment characteristics which are particularly important for meeting the Trustee's investment objectives.

Manager Implementation

Assets are invested predominantly on regulated markets, as so defined in legislation. Any investments that do not trade on regulated markets are kept to a prudent level.

Use of Derivatives

The investment managers are permitted to use derivative instruments to reduce risk or for efficient portfolio management. Risk reduction would include mitigating the impact of a potential fall in markets or the implementation of currency hedging whilst efficient portfolio management would include using derivatives as a cost-effective way of gaining access to a market or as a method for generating capital and/or income with an acceptable level of risk.

Leverage

The instruments used by the investment managers of the Liability Matching Assets may result in the Liability Matching Assets being leveraged. Since these assets are closely aligned to the liabilities, the allocation to Liability Matching Assets (and any associated leverage) reduces the volatility of the Scheme's funding position and therefore reduces risk.

6. Stewardship

The Trustee's policy in relation to the exercise of rights attaching to investments, and undertaking engagement activities in respect of investments, is that they wish to encourage best practice in terms of stewardship.

However, the Trustee invests in pooled investment vehicles and therefore accepts that ongoing engagement with the underlying companies (including the exercise of voting rights) will be determined by the investment managers' own policies on such matters. For that reason, the Trustee recognises that its ability to directly influence the action of companies is limited.

Nevertheless, the Trustee expects that each investment manager will discharge its responsibilities in respect of investee companies in accordance with that investment manager's own corporate governance policies and current best practice, including the UK Corporate Governance Code and UK Stewardship Code.

The Trustee also expects that each investment manager will take ESG factors into account when exercising the rights attaching to investments and in taking decisions relating to the selection, retention and realisation of investments.

When considering the suitability of an investment manager, the Trustee (in conjunction with its investment adviser) will take account of any particular characteristics of that manager's engagement policy that are deemed to be financially material.

The Trustee recognises that the members might wish the Trustee to engage with the underlying companies in which the Scheme invests with the objective of improving corporate behaviour to benefit the environment and society. However, the Trustee's priority is to select investment managers which are best suited to help meet the Trustee's investment objectives. In making this assessment, the Trustee will receive advice from its investment adviser. The Trustee recognises that the investment managers' own policies are likely to be focussed on maximising financial returns and minimising financial risks rather than targeting an environmental or societal benefit.

7. Investment Manager Arrangements

As the Scheme’s assets are held in pooled funds, the Trustee has limited influence over the investment managers’ investment decisions. In practice, investment 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 therefore the Trustee's responsibility to ensure that the approaches adopted by investment managers are consistent with the Trustee's 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. The Trustee assesses this when selecting and monitoring managers.

The Trustee's policy on selecting, monitoring, evaluating and (where necessary) terminating these arrangements is set out in further detail below.

Compatibility of Pooled Funds with the Trustee's Investment Strategy

When selecting a pooled fund, the Trustee considers various factors, including:

- the assets that will be held within that fund and whether the asset allocation of the fund is expected to change over time;
- the risks associated with the fund along with the return that is expected;
- the fund’s objective (as stated by the fund’s investment manager) and whether the objective is consistent with the performance that the Trustee expects from that fund;
- the fund’s fee structure to ensure that this is reasonable and that it does not provide an incentive for the investment manager to manage the fund in a way that differs from the expectations of the Trustee;
- how frequently underlying investments within the fund are expected to be traded by the investment manager;
- how financially material considerations (including ESG factors) over the appropriate time horizon are taken into account by the investment manager;
- the investment manager’s policy in relation to the exercise of the rights (including voting rights) attaching to the investments held within the pooled fund; and
- the investment manager’s policy in relation to undertaking engagement activities in respect of the investments held within the pooled fund*.

**This includes engaging with an issuer of debt or equity regarding matters including (but not limited to) performance, strategy, capital structure, management of actual or potential conflicts of interest, risks, and ESG matters. It also includes engaging on these matters with other investment managers, other holders of debt or equity and persons or groups of persons who have an interest in the issuer of debt or equity.*

After analysing the above characteristics for a fund, the Trustee identifies how that fund would fit within their overall investment strategy for the Scheme and how the fund is expected to help the Trustee meet its investment objectives.

7. Investment Manager Arrangements (continued)

Duration of Investment Manager Arrangements

The Trustee normally expects that pooled funds will be held for several years.

However, as part of the periodic strategic asset allocation reviews (which take place at least every three years), the Trustee will review whether the ongoing use of each fund remains consistent with its investment strategy.

The Trustee regularly monitors the financial and non-financial performance of the pooled funds held and details of this monitoring process is set out below. If the Trustee becomes concerned about the ongoing suitability of a pooled fund, they may reduce exposure to it or disinvest entirely. Such action is expected to be infrequent.

Monitoring Pooled Funds

The Trustee regularly assesses the performance of each fund held and this monitoring includes an assessment of whether the investment manager continues to operate the fund in a manner that is consistent with the factors used by the Trustee to select the fund (as listed above).

When assessing the performance of a fund, the Trustee does not usually place too much emphasis on short-term performance although they will seek to ensure that reasons for short-term performance (whether favourable or unfavourable) are understood.

The Trustee expects the investment managers of pooled funds to invest for the medium to long term and they expect investment managers to engage with issuers of debt or equity with a view to improving performance over this time frame.

If it is identified that a fund is not being operated in a manner consistent with the factors used by the Trustee to select the fund, or that the investment manager is not engaging with issuers of debt or equity, the Trustee may look to replace that fund. However, in the first instance, the Trustee would normally expect its investment adviser to raise the Trustee's concerns with the investment manager. Thereafter, the Trustee, in conjunction with its investment adviser, would monitor the performance of the fund to assess whether the situation improves.

7. Investment Manager Arrangements (continued)

Portfolio Turnover

The Trustee is aware of the requirement to monitor portfolio turnover costs (the costs incurred as a result of the buying, selling, lending or borrowing of investments).

When selecting a pooled fund, the Trustee will consider how the investment manager defines and measures:

- the targeted portfolio turnover (the frequency within which the assets of the fund are expected to be bought or sold); and

- turnover range (the minimum and maximum frequency within which the assets of the fund are expected to be bought or sold).

At least annually, the Trustee, in conjunction with its investment adviser, will consider the transaction costs incurred on each pooled fund. As part of this analysis, the Trustee will consider whether the incurred turnover costs have been in line with expectations.

The Trustee will take the above information on portfolio turnover into account when assessing the ongoing suitability of each pooled fund.

8. Risk Mitigation

When determining suitable investment objectives and when designing the Scheme's investment strategy, the Trustee (in conjunction with its investment adviser), will take into account all risks that are assessed to be financially material. The principal investment risks are listed in the Trustee's *Investment Risk Policy*. That Policy also provides an explanation of how the investment risks are managed.

Risk Capacity and Risk Appetite

In determining a suitable investment strategy, the Trustee considers how the volatility of the funding position is likely to be affected by changes to the asset allocation. An important consideration for the Trustee is whether a potential investment strategy is consistent with the ability of the sponsoring employer to address any future increase in deficit that may arise due to market movements.

Self-Investment Risk

Legislation imposes a restriction that no more than 5% of a pension scheme's assets may be related to the sponsoring employer. The Trustee does not hold any direct employer-related assets and any indirect exposure is expected to be less than 5% of total assets.

ESG Risks

The Trustee (in conjunction with its investment adviser) has considered the likely impact of the financially material ESG risks associated with all of the Scheme's investments and has assessed the mitigation of such risks implemented by each of the investment managers. In making this assessment, the Trustee recognises that, where pooled investment vehicles are held, the extent to which ESG factors will be used in the selection of suitable underlying investments will be determined by the investment managers' own policies on such matters.

Liquidity Risk

The majority of the Scheme's investments will be liquid and will be realisable for cash at relatively short notice without incurring high costs. However, the Trustee recognises that the liabilities are long-term in nature and that a modest allocation to less-liquid investments may be appropriate.

Details of the liquidity characteristics of the funds held are provided in Appendix 3.

9. Monitoring

The Trustee regularly reviews the Scheme’s investments for all matters considered to be financially material over the appropriate time horizon. This includes reviewing that the assets continue to be managed in accordance with each manager’s mandate and that the choice of managers remains appropriate.

Furthermore, the Trustee regularly monitors the position of the investment managers with regards to ESG matters.

To assist with the monitoring of the investment managers, the Trustee receives regular information from its investment adviser providing details of investment manager performance and asset allocation decisions. This analysis includes comparisons with benchmarks and relevant peer-group data.

The analysis assesses whether performance has been in line with expectations given market conditions and whether the level of risk has been as expected.

The investment adviser also provides regular updates on the investment managers’ actions regarding ESG factors and shareholder engagement.

The investment adviser regularly meets with the managers of pooled funds on its approved list.

10. Future Amendments

This statement will be reviewed at least every three years and without delay after any significant change in circumstances or investment strategy.

Before any changes are made to the Main Section investment strategy, the Trustee will consult with the employers in the Main Section. Such changes may, however, be made without consulting any of the segregated sections.

Before changes are made to the investment strategy of any of the segregated sections, the Trustee will consult with employers of said section. Such changes may, however, be made without consulting the employers in the Main Section.

The Trustee has consulted with the sponsoring employer as part of the work preparing this statement.

The principles set out in this Statement have been agreed by the Trustee:

Signed:………………………………………………… Date: 07/09/2020………………………

For and on behalf of the Trustee of the Mercury Provident Pension Scheme.

Appendix 1: The Trustee’s Investment Strategy

Strategic Asset Allocation

In determining the strategic asset allocation, the Trustee views the investments as falling into two broad categories:

1. **Growth Assets** – Assets that are expected to deliver long-term returns in excess of liability growth. The use of Growth Assets is expected to deliver a level of investment returns deemed appropriate by the Trustee given the risk involved.

2. **Liability Matching Assets –** Assets that are expected to react to changes in market conditions in a similar way to the liabilities. The use of Liability Matching Assets is expected to protect the funding position of the Scheme.

In addition, the Trustee may hold cash. Cash will normally be held in the Trustee's bank account if it is to be used to make payments due in the short-term whereas cash that is to be held for more than a few weeks will normally be held in a cash fund.

The Trustee determines an appropriate strategic allocation between Growth Assets and Liability Matching Assets for each Section of the Scheme to reflect the circumstances of each Section.

The Trustee will review the strategic asset allocation of each Section periodically, and at least every three years, to ensure that the investment strategy remains consistent with the Trustee's funding objectives. As part of such a review, the Trustee will consider the risks associated with the investment strategy.

Growth Assets

For each Section of the Scheme, the structure of the Growth Assets has been designed to offer diversification across a range of underlying asset classes and to achieve this by combining investment managers with different asset management styles.

Liability Matching Assets

For each Section of the Scheme, the Liability Matching Assets are invested in leveraged LDI funds with the allocations having been designed to provide the following levels of liability hedging:

• Liability sensitivity to changes in gilt yields	Match liabilities equal to the total asset value
• Liability sensitivity to changes in expectations for future inflation	Match liabilities equal to the total asset value

The Trustee recognises that, in practice, the liability hedging will not be perfect – particularly as the liability profile will evolve over time as benefits are paid from the Scheme.

The Trustee will review the structure of the Liability Matching Portfolio for each Section of the Scheme alongside each actuarial valuation or more frequently if there is a significant change in the liability profile.

Appendix 1: The Trustee's Investment Strategy (continued)

LDI Leverage Management Policy

An increase in yields will cause the leverage of LDI funds to increase. To prevent the leverage of an LDI fund breaching an upper threshold, additional capital (a recapitalisation payment) may need to be moved into the fund.

In contrast, a reduction in yields will cause the leverage of LDI funds to fall. If the leverage of an LDI fund falls below a minimum threshold, the LDI manager may make a cash payment (a releveraging payment) from the fund to raise the leverage.

For each Section of the Scheme, the Trustee has determined the funds which should be used as the source for any recapitalisation payments that are required or as the funds into which any releveraging payments should be invested.

Investment Strategy Implementation

The investment strategy for each section is implemented by investing in pooled funds which are accessed via the Mobius investment platform.

Where a cash fund is required, each section uses the Insight Liquidity Plus Fund (via the Mobius investment platform).

Appendix 2 provides details of how the investment strategy is implemented for each Section of the Scheme.

Appendix 2.1: Implementation Details – Main Section

Application

Appendix 2.1 describes the implementation of the strategy for any Section of the Scheme which does not have a separately recorded investment strategy elsewhere in Appendix 2. Appendix 2.1. should be read in conjunction with *Appendix 1: The Trustee's Investment Strategy*.

Asset Allocation

At the time of preparing this Appendix, the split of the assets was approximately:

- Growth Assets: 71%
- Liability Matching Assets: 21%
- Cash: 8%

This split is not regularly rebalanced and will vary over time as market conditions change.

Growth Assets

The strategic allocation for the Growth Assets is as follows:

Pooled Fund	Strategic Allocation of the Growth Assets Main Section
LGIM Future World UK Equity Index Fund	30%
LGIM Future World Developed (ex-UK) Equity Index Fund	15%
LGIM Future World Developed (ex-UK) Equity Index Fund - GBP Currency Hedged	15%
Baillie Gifford Multi-Asset Growth Fund	20%
Invesco Global Targeted Returns Fund	20%
Total Growth Assets	***100%***

The allocation of the Growth Assets is not automatically rebalanced but will be monitored and rebalanced at the discretion of the Trustee.

Liability Matching Assets

The Liability Matching Assets are invested in leveraged LDI funds managed by Insight.

LDI Leverage Management Policy

Recapitalisation payments used to reduce the leverage of an LDI fund should be taken from:

- Insight Liquidity Plus Fund 100%

Releveraging payments made out of an LDI fund should be invested in:

- Baillie Gifford Multi-Asset Growth Fund 50%
- Invesco Global Targeted Returns Pension Fund 50%

Appendix 2.2: Implementation Details – Solden Hill House Section

Application

Appendix 2.2 describes the implementation of the strategy for the Solden Hill House Section of the Scheme and it should be read in conjunction with *Appendix 1: The Trustee's Investment Strategy*.

Asset Allocation

At the time of preparing this Appendix, the split of the assets was approximately:

- Growth Assets: 68%
- Liability Matching Assets: 21%
- Cash: 11%

This split is not regularly rebalanced and will vary over time as market conditions change.

Growth Assets

The strategic allocation for the Growth Assets is as follows:

Pooled Fund	Strategic Allocation of the Growth Assets Solden Hill House Section
LGIM Future World UK Equity Index Fund	30%
LGIM Future World Developed (ex-UK) Equity Index Fund	15%
LGIM Future World Developed (ex-UK) Equity Index Fund - GBP Currency Hedged	15%
Baillie Gifford Multi-Asset Growth Fund	20%
Invesco Global Targeted Returns Fund	20%
Total Growth Assets	***100%***

The allocation of the Growth Assets is not automatically rebalanced but will be monitored and rebalanced at the discretion of the Trustee.

Liability Matching Assets

The Liability Matching Assets are invested in leveraged LDI funds managed by Insight.

LDI Leverage Management Policy

Recapitalisation payments used to reduce the leverage of an LDI fund should be taken from:

- Insight Liquidity Plus Fund 100%

Releveraging payments made out of an LDI fund should be invested in:

- Baillie Gifford Multi-Asset Growth Fund 50%
- Invesco Global Targeted Returns Pension Fund 50%

Appendix 2.3: Implementation Details – Newland Hurst Section

Application

Appendix 2.3 describes the implementation of the strategy for the Newland Hurst Section of the Scheme and it should be read in conjunction with *Appendix 1: The Trustee's Investment Strategy*.

Asset Allocation

At the time of preparing this Appendix, the split of the assets was approximately:

- Growth Assets: 69%
- Liability Matching Assets: 20%
- Cash: 11%

This split is not regularly rebalanced and will vary over time as market conditions change.

Growth Assets

The strategic allocation for the Growth Assets is as follows:

Pooled Fund	Strategic Allocation of the Growth Assets Newland Hurst Section
LGIM Future World UK Equity Index Fund	30%
LGIM Future World Developed (ex-UK) Equity Index Fund	15%
LGIM Future World Developed (ex-UK) Equity Index Fund - GBP Currency Hedged	15%
Baillie Gifford Multi-Asset Growth Fund	20%
Invesco Global Targeted Returns Fund	20%
Total Growth Assets	***100%***

The allocation of the Growth Assets is not automatically rebalanced but will be monitored and rebalanced at the discretion of the Trustee.

Liability Matching Assets

The Liability Matching Assets are invested in leveraged LDI funds managed by Insight.

LDI Leverage Management Policy

Recapitalisation payments used to reduce the leverage of an LDI fund should be taken from:

- Insight Liquidity Plus Fund 100%

Releveraging payments made out of an LDI fund should be invested in:

- Baillie Gifford Multi-Asset Growth Fund 50%
- Invesco Global Targeted Returns Pension Fund 50%

Appendix 2.4: Implementation Details – Weleda Section

Application

Appendix 2.3 describes the implementation of the strategy for the Weleda Section of the Scheme and it should be read in conjunction with *Appendix 1: The Trustee's Investment Strategy*.

Asset Allocation

At the time of preparing this Appendix, the split of the assets was approximately:

- Growth Assets: 67%
- Liability Matching Assets: 33%

This split is not regularly rebalanced and will vary over time as market conditions change.

Growth Assets

The strategic allocation for the Growth Assets is as follows:

Pooled Fund	Strategic Allocation of the Growth Assets Weleda Section
Baillie Gifford Multi-Asset Growth Fund	50%
Invesco Global Targeted Returns Fund	50%
Total Growth Assets	***100%***

The allocation of the Growth Assets is not automatically rebalanced but will be monitored and rebalanced at the discretion of the Trustee.

Liability Matching Assets

The Liability Matching Assets are invested in leveraged LDI funds managed by BMO.

LDI Leverage Management Policy

Recapitalisation payments used to reduce the leverage of an LDI fund should be taken from:

- Baillie Gifford Multi-Asset Growth Fund 50%
- Invesco Global Targeted Returns Pension Fund 50%

Releveraging payments made out of an LDI fund should be invested in:

- Baillie Gifford Multi-Asset Growth Fund 50%
- Invesco Global Targeted Returns Pension Fund 50%

Appendix 3: Cashflow Policy and AVC Arrangements

Cashflow Management Policy

Any investments or disinvestments will be made at the discretion of the Trustee, but the Trustee will maintain a *Cashflow Management Policy* which will record how such payments should be structured. The *Cashflow Management Policy* will be designed to ensure the allocation of the Scheme's assets remains closely aligned with the strategies described in this statement.

To ensure the Scheme operates efficiently, the Trustee may share the *Cashflow Management Policy* with the individual(s) responsible for processing payments from the Scheme.

The *Cashflow Management Policy* will be reviewed from time-to-time by the Trustee and, as a minimum, at least every three years in line with a review of this statement. Given that the *Cashflow Management Policy* is designed to keep the Scheme's asset allocation aligned with the investment strategies and investment principles described in this statement, the sponsoring employer is satisfied that the *Cashflow Management Policy* can be amended by the Trustee without consulting the sponsoring employer.

Additional Voluntary Contributions

The Scheme's AVC arrangements are held with Aviva (formerly Friends Life). The investment vehicles utilised are the Aviva (Friends Life) With-Profits Fund and the Aviva (Friends Life) Stewardship Fund.

Appendix 4: Fund Details

This Appendix provides a summary of the funds used to implement the Scheme's investment strategy. The details provided below were correct as at August 2020.

The following points should be noted:

- **AMC**: The Annual Management Charge applicable to each fund represents the fee payable to the fund manager.
- **Additional expenses**: These are third party costs associated with the operation of a fund such as fees paid to the administrator, the custodian and the auditor and the costs associated with the use of third-party funds where these are used. The level of the additional expenses may vary over time.
- **Legal Structure**: An explanation of the different types of fund legal structures is provided in the Trustee's *Investment Risk Policy* document.
- **T**: Trade Date

Baillie Gifford Multi-Asset Growth Fund		
Objective	The Baillie Gifford Multi-Asset Growth Fund invests in a variety of asset classes with the aim of achieving long-term capital growth at a level of risk lower than investment in equities. The fund's objective is to outperform the UK base rate by at least 3.5% p.a. (net of fees) over rolling five-year periods with an annualised volatility of less than 10%.	
Legal Structure	Investment Company with Variable Capital	
Trading Frequency	Daily	
Notice Period**	T-1	
Settlement Period	T+3	
Fee (via Mobius)	AMC:	0.39% per annum
	Additional Expenses (approx.):	0.10% per annum

Invesco Global Targeted Returns Fund		
Objective	The Fund aims to provide positive total investment returns in all market conditions over a rolling three-year period. It targets a return above cash of 5% per annum gross of fees and volatility of less than half the volatility of global equities. The fund is actively managed and invests in a broad selection of asset classes including equities, bonds and derivative-based investment strategies.	
Legal Structure	Unit-linked insurance policy	
Trading Frequency	Daily	
Notice Period**	T-2	
Settlement Period	T+5	
Fee (via Mobius)	AMC:	0.75% per annum
	Additional Expenses (approx.):	-

Appendix 4: Fund Details (continued)

LGIM Future World UK Equity Index Fund		
Objective	To track the performance of the Solactive L&G ESG UK Index (less withholding tax where applicable) to within +/-0.60% p.a. for two years out of three.	
Legal Structure	Unit-linked insurance policy	
Trading Frequency	Daily	
Notice Period**	T-2	
Settlement Period	T+2	
Fee	AMC:	0.094% per annum
	Additional Expenses (approx.):	-

LGIM Future World Developed (ex-UK) Equity Index Fund		
Objective	To track the performance of the Solactive L&G ESG Developed ex UK Index (less withholding tax where applicable) to within +/-0.60% p.a. for two years out of three.	
Legal Structure	Unit-linked insurance policy	
Trading Frequency	Daily	
Notice Period**	T-2	
Settlement Period	T+2	
Fee	AMC:	0.143% per annum
	Additional Expenses (approx.):	-

LGIM Future World Developed (ex-UK) Equity Index Fund - GBP Currency Hedged		
Objective	To track the performance of the Solactive L&G ESG Developed ex UK Index GBP Hedged (less withholding tax where applicable) to within +/-0.60% p.a. for two years out of three.	
Legal Structure	Unit-linked insurance policy	
Trading Frequency	Daily	
Notice Period**	T-2	
Settlement Period	T+2	
Fee	AMC:	0.168% per annum
	Additional Expenses (approx.):	-

Appendix 4: Fund Details (continued)

Insight LDI Funds		
Objective	To provide liability matching by delivering nominal and/or inflation-linked returns.	
Legal Structure	Investment Company with Variable Capital	
Trading Frequency	Daily	
Notice Period**	T-1	
Settlement Period	T+4	
Fee	AMC:	0.1% per annum*
	Additional Expenses (approx.):	0.06% per annum

*The cost of the fund is determined by the exposure value of units held. AMC quoted is the factor the leverage is multiplied by. Mobius will also charge 0.06% in addition.

Insight Liquidity Plus Fund		
Objective	The Insight Liquidity Plus Fund aims to provide investors with stability of capital and income through investment in short term fixed income and variable rate securities.	
Legal Structure	Investment Company with Variable Capital	
Trading Frequency	Daily	
Notice Period**	T-2	
Settlement Period	T	
Fee	AMC:	0.04% per annum*
	Additional Expenses (approx.):	-

*The underlying fund manager fee of 0.15% is accounted for in the fund price therefore Mobius only charge the platform fee.

Appendix 4: Fund Details (continued)

BMO LDI Funds		
Objective	To provide liability hedging by offering interest rate and / or inflation protection which replicates the liability profile of a typical UK defined benefit pension scheme.	
Legal Structure	Investment Company with Variable Capital	
Trading Frequency	Daily	
Notice Period**	T-2 if the money is being paid to the Trustee bank account; T-4 if the money is being paid to a third party	
Settlement Period	T+3	
Fee	AMC:	0.33% per annum
	Additional Expenses (approx.):	0.0521% to 0.057% per annum

**Notice periods will be established with Mobius at the time of each transition.