Statement of Investment Principles for the Credit Suisse Group (UK) Pension Fund

1. Introduction

This Statement of Investment Principles ("SIP") sets out the policy of the Trustee of the Credit Suisse Group (UK) Pension Fund ("the Trustee") on various matters governing decisions about the investments of the Credit Suisse Group (UK) Pension Fund ("the Fund"), a scheme with Defined Benefit ("DB") and Defined Contribution ("DC") sections; the Final Salary and Money Purchase Section, respectively. This SIP replaces the previous SIP dated 10 July 2024.

The SIP is designed to meet the requirements of Section 35 (as amended) of the Pensions Act 1995 ("the Act"), the Occupational Pension Schemes (Investment) Regulations 2005, the Pension Regulator's guidance for defined benefit pension schemes (March 2017) and the Occupational Pension Schemes (Charges and Governance) Regulations 2015. The SIP also reflects the Trustee's response to the Myners voluntary code of investment principles.

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

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

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

2. Investment objectives

2.1. Final Salary Section

The primary objective for the Final Salary Section is to ensure that the Fund should be able to meet benefit payments as they fall due.

To do so, the Trustee recognises that it must take into account the employer's position in relation to the Fund and, in particular, its attitude to risk.

Having purchased a bulk annuity ("Buy-in Policy") to cover the Fund's known defined benefit liabilities, the Trustee's secondary objective is to preserve the value of the residual assets.

2.2. Money Purchase Section

The Trustee's primary objectives for the Money Purchase Section are to provide members with access to:

- an appropriate range of investment options, reflecting the membership profile of the Money Purchase Section and the variety of ways that members can draw their benefits in retirement; and
- a default investment option that the Trustee believes to be reasonable for those members that do not wish to make their own investment decisions. The objective of the default option is to generate returns above inflation whilst members are some distance from retirement, but then to switch automatically and gradually to lower risk investments as members near retirement.

3. Investment strategy

Taking into account the objectives described in Section 2 above, the Trustee, with the help of its advisers and in consultation with the employer, reviewed the investment strategy for both the Money Purchase Section and the Final Salary Section in 2024.

3.1. Final Salary Investment Strategy

The investment strategy resulting from the review of the Final Salary Section is outlined in the Investment Policy Implementation Document ("IPID").

The Trustee has secured all known defined benefit liabilities through a Buy-in Policy with Legal and General Assurance Limited ("LGAS").

The residual assets are invested in a combination of gilts and cash with Insight, in order to preserve the value of these assets and broadly hedge against the estimated interest rate and inflation exposures of the residual premiums to be paid to LGAS.

The Trustee does not have a fixed strategic benchmark in place and expects the allocation to change over time as required to meet the Plan's objectives.

3.2. Money Purchase Investment Arrangements

For the Money Purchase Section of the Fund, the Trustee has made available a range of investment funds for members. Each member is responsible for specifying one or more funds for the investment of their account, having regard to their attitude to the risks involved. If a member does not choose an investment option, their account will be invested into the default option, which is managed as a "lifestyle" strategy (ie it automatically combines investments in proportions that vary according to the time to retirement age). There are another two "lifestyle" investment strategies available to members, details of which can be found in the IPID.

The default option was designed to be in the best interests of the majority of the members based on analysis of the demographics of the Fund's membership carried out when the strategy was reviewed in 2021. The most recent review carried out on 14 May 2024 concluded that the default option remained suitable given the demographics of the Fund's membership at the time of the review. The default option targets drawdown at retirement, since the Trustee believes that most members will wish to take their benefits in this form. Therefore, in the initial growth phase the default option is invested to target a return above inflation, and then in the 10 years before retirement, it switches gradually into less risky assets, with the asset allocation at retirement being designed to be appropriate for members taking drawdown.

The Trustee notes that in October 2024, a proportion of the membership were transferred to a Master Trust. As such, a further strategy review will be undertaken in early 2025 which will focus on the suitability of the strategy for those members that are expected to remain in the Money Purchase Section of the Fund.

The Trustee will monitor the relevant members' behaviour to check whether assumptions made about how members will access their benefits are borne out in practice.

During the temporary suspension of the Threadneedle Property Fund between 18 March 2020 and 16 September 2020, a decision was taken to temporarily redirect contributions into the CSPF Money Market Fund. As relevant members' contributions were directed into this fund without them making an active selection, this fund has been treated as a default arrangement for the purpose of fulfilling legislative requirements since March 2020. The CSPF Money Market Fund will remain a default until such a point that it no longer contains defaulted assets. It continued to hold defaulted assets as at October 2024.

The objective of the CSPF Money Market Fund is to produce a return in excess of its benchmark (SONIA Overnight). The fund is aimed at short-term investors seeking capital stability, a good degree of liquidity and minimum volatility of returns. The fund invests in short maturity instruments, typically overnight deposits and repurchase agreements, certificates of deposit, commercial paper and fixed/floating rate bonds, with a maximum maturity of 2 years.

4. Considerations in setting the investment arrangements

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

The Trustee considered a wide range of asset classes for investment, taking account of the expected returns and key individual risks associated with those asset classes as well as how these risks can be mitigated where appropriate.

Some of the Trustee's key investment beliefs are set out below.

- asset allocation is the primary driver of long-term returns;
- risk-taking is necessary to achieve return, but not all risks are rewarded;
- equity, credit and illiquidity are the primary rewarded risks;
- risks that are typically not rewarded should generally be avoided, hedged or diversified;
- investment markets are not always efficient and there may be opportunities for good active managers to add value
- long-term environmental, social and economic sustainability is one of many factors that the Trustee should consider when making investment decisions; and
- costs have a significant impact on long-term performance.

4.1. Final Salary Section

In setting the strategy for the Final Salary Section the Trustee took into account:

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

4.2. Money Purchase Section

In determining the investment arrangements for the Money Purchase Section the Trustee took into account:

- the best interests of members and beneficiaries;
- the profile of the membership and what this is likely to mean for the choices members might make upon reaching retirement;
- the risks, rewards and suitability of a number of possible asset classes and lifestyle strategies and whether the return expected for taking any given investment risk is considered sufficient given the risk being taken;
- the need for appropriate diversification within the default strategy and other lifestyle options to ensure that, for each such option, both the overall level of investment risk and the balance of individual asset risks are appropriate;
- the need for appropriate diversification within the other investment options offered to members;
- the Trustee's investment beliefs about how investment markets work and which factors are most likely to impact investment outcomes.

Our policy regarding investments in illiquid assets in the DC default arrangements is set out below. Illiquid assets mean assets that cannot be easily or quickly be sold or exchanged for cash, and where assets are invested in a collective investment scheme this includes any such assets held by the collective investment scheme.

The DC default arrangements do not currently include any investments in illiquid assets.

We believe that long-term net risk-adjusted investment returns may be improved by investing in illiquid assets. However, illiquid assets in DC pension schemes is a relatively new and developing area. Because of this we wish to see further performance track record of illiquid funds available to DC schemes before we invest member assets in them. Therefore, at this time it is our policy not to invest in illiquid assets within the DC default arrangements. However, with the support of our investment advisers, we intend to consider investment in illiquid assets as part of our regular reviews of the default arrangements.

5. Implementation of the investment arrangements

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

Details of the investment managers are set out in the separate IPID.

The Trustee has limited influence over managers' investment practices, but it encourages its managers to improve their practices where appropriate.

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

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

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

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

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

5.1. Money Purchase Section

In respect of the Money Purchase Section, the Trustee has entered into a contract with a platform provider, who makes available the range of investment options to members. There is no direct contract between the Fund and the underlying investment managers of the Money Purchase Section investment funds.

The Trustee has signed agreements with the platform provider in respect of the Money Purchase Section setting out in detail the terms on which the portfolios are to be managed. The investment managers' primary role is the day-to-day investment management of the Fund's investments.

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

6. Realisation of investments

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

6.1. Final Salary Section

The Trustee expects to be able to meet benefit payments as they fall due using income from the Buy-in Policy. The Trustee is comfortable that any additional cash flow requirements could be met from the Fund's remaining assets which are mostly realisable at short notice.

6.2. Money Purchase Section

For the Money Purchase Section, the Trustee's policy is to invest in funds that offer daily dealing to enable members to readily realise and change their investments. The Fund Administrator will disinvest assets as instructed, according to members' entitlements.

7. Financially material considerations and non-financial matters

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

The Trustee considers it is necessary to act in the best financial interests of Fund members and therefore it expects its investment managers to take account of financially material considerations (including climate change and other ESG considerations), taking into account the nature and time horizon of the investments. It seeks to appoint managers, with the assistance of its Investment Advisor, that have appropriate skills and processes to do this, and from time to time reviews how its managers are taking account of these issues in practice.

The Trustee cannot usually directly influence investment managers' policies on ESG and ethical factors where assets are held in pooled funds; this is due to the nature of these investments. The Trustee seeks to encourage its managers to improve their practices where appropriate through engaging with them on these issues.

The Fund's Investment Adviser reviews the fund managers' ESG polices on a regular basis as part of its manager research process. The Investment Adviser assigns a score from 1 (weak) to 4 (strong) taking into account the manager's approach to managing ESG-relating risks and its stewardship practices such as exercising voting rights and engaging with company management. The Trustee reviews the RI scores assigned to the funds used within the Fund's investment strategy on an annual basis and before appointing new managers.

The Trustee also receives presentations from its managers on how ESG-related issues are taken into account in their investment processes. The Trustee will challenge the fund manager's approaches where appropriate and will report on ESG-related issues in relation to the Fund's investment strategy as part of its annual Implementation Statement.

The Trustee does not take into account any non-financial factors (ie matters relating to the ethical and other views of members and beneficiaries, rather than considerations of financial risk and return) when making investment decisions.

8. Voting and engagement

The Trustee recognises its responsibilities as owners of capital, and believes that good stewardship practices, including monitoring and engaging with investee companies, and exercising voting rights attaching to investments, protect and enhance the long-term value of investments.

The Trustee has delegated to its investment managers the exercise of rights attaching to investments, including voting rights, and engagement with issuers of debt and equity and other relevant persons about relevant matters such as performance, strategy, capital structure, management of actual or potential conflicts of interest, risks and ESG considerations.

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

The Trustee monitors managers' activities in relation to ESG factors, voting and engagement on a regular basis. It seeks to understand how they are implementing their stewardship policies in practice to check that their stewardship is effective and aligned with their expectations.

The Trustee has selected some priority ESG themes to provide a focus for its monitoring of investment managers' voting and engagement activities and these have been taken into account in the Implementation Statement for Fund Years to 31 December 2022 onwards). The Trustee reviews the themes regularly and updates them if appropriate. It communicates these stewardship priorities and their more general expectations in relation to ESG factors, voting and engagement to its managers periodically.

If the Trustee's monitoring identifies areas of concern, the Trustee will engage with the relevant manager to encourage improvements.

9. Additional voluntary contributions (AVCs)

In addition to being able to invest AVCs with Fidelity, the Fund has a further four AVC providers:

- Scottish Friendly
- Phoenix Life Limited
- Prudential
- Standard Life

Members can invest across a selection of With Profits and Unit Linked funds as part of these AVC arrangements.

10. Money purchase underpin

Certain categories of member have Final Salary benefits with a Money Purchase underpin, where the money purchase element is a notional money purchase fund and the value varies in line with the returns on the Fund's Final Salary assets.

Approved by the Trustee of the Fund

Investment governance, responsibilities, decision-making and fees

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

1. Trustee

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

- setting out the risk parameters, in consultation with the employer;
- setting the investment strategy, in consultation with the employer;
- developing a mutual understanding of investment and risk issues with the employer;
- reviewing the investment policy as part of any review of the investment strategy;
- setting the policy for rebalancing between asset classes;
- appointing, monitoring, reviewing and dismissing investment managers, investment advisers, Scheme Actuary and other service providers;
- monitoring the exercise of the investment powers that they have delegated to the investment managers and monitoring compliance with Section 36 of the Act;
- communicating with members as appropriate on investment matters, such as the Trustee's assessment of its effectiveness as a decision-making body, the policies regarding responsible ownership and how such responsibilities have been discharged;
- putting effective governance arrangements in place and documenting these arrangements in a suitable form;
- reviewing the content of this SIP from time to time and modifying it if deemed appropriate; and
- consulting with the employer when reviewing the SIP.

2. Platform provider – money purchase section

The investment platform provider will be responsible for:

- providing access to a range of funds managed by various investment managers; and
- providing the Trustee with regular information concerning the management and performance of the assets.

3. Investment managers

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

- managing the portfolios of assets according to their stated objectives, and within the guidelines and restrictions set out in their respective investment manager agreements and/or other relevant governing documentation.

- taking account of financially material considerations (including climate change and other ESG considerations) as appropriate when managing the portfolios of assets;
- providing the Trustee / investment platform provider with regular information concerning the management and performance of their respective portfolios; and
- having regard to the provisions of Section 36 of the Act insofar as it is necessary to do so.

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

4. Investment Adviser

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

- the Final Salary Section, advising on how material changes within the Fund's benefits, membership, and funding position may affect the manner in which the assets should be invested and the asset allocation policy;
- the Money Purchase Section, advising on a suitable fund range and default strategy for the Fund, and how material changes to legislation or within the Fund's benefits and membership may impact this;
- advising on the selection, and review, of the investment managers, incorporating its assessment of the nature and effectiveness of the managers' approaches to financially material considerations (including climate change and other ESG considerations); and
- participating with the Trustee in reviews of this SIP.

The details of the Investment Adviser's appointment, including the scope of its remit and its fees are set out in a contract entered into between the Trustee and the Investment Adviser.

5. Annuity providers

The annuity provider's responsibility is to pay the pensions secured under the bulk annuity contract accurately and on a timely basis.

6. Fee structures

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

The Trustee has agreed Terms of Business with the Investment Adviser, under which work undertaken is charged for by an agreed fixed fee or on a "time-cost" basis.

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

The Trustee has appointed a custodian in respect of some of the Fund's investments. The custodian fees are predominantly calculated on a fixed fee basis. The fee rates are believed to be consistent with the custodian's general terms for institutional clients and are considered by the Trustee to be reasonable when compared with those of other similar providers.

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

7. Performance assessment

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

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

8. Working with the Fund's employer

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

Policy towards risk

Appendix 2

1. Final Salary Section

1.1. Risk appetite and risk capacity

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

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

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

1.2. Approach to managing and monitoring investment risks

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

1.2.1. Risk of insolvency of the buy-in policy provider

As the buy-in policy represents the majority of the Fund's assets, a key risk is that the buy-in policy provider fails to honour its obligations under the policy.

The Trustee took investment advice from LCP in relation to the purchase of the buy-in policy.

The Trustee recognises that this risk cannot be eliminated altogether, however, the Trustee notes that the strong regulatory regime that applies to insurance companies in the UK, and that the Financial Services Compensation Scheme is expected to provide significant additional protection in the event of insolvency (albeit this is untested to date).

1.2.2. Risk of inadequate returns

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

1.2.3. Risk from lack of diversification

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

1.2.4. Interest rate and inflation risk

The buy-in policy removes most of this risk. Some of the other Final Salary Section's assets are subject to interest rate and inflation risk because some of the Fund's assets are held in bonds, as segregated investments. However, the interest rate and inflation exposure of the Fund's assets hedges the corresponding risks associated with the Fund's liabilities.

1.2.5. Credit risk

This is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation.

The Fund is not subject to material credit risk because it invests in a buy-in and gilts and cash.

1.2.6. Investment manager risk

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

1.2.7. Liquidity/marketability risk

For the Final Salary Section, this is the risk that the Fund is unable to realise assets to meet benefit cash flows as they fall due, or that the Fund will become a forced seller of assets in order to meet benefit payments. The Trustee is aware of the Fund's cash flow requirements and believes that this risk is managed by the regular income from the buy-in policy and maintaining an appropriate degree of liquidity across the Fund's residual investments.

1.2.8. Risk from excessive charges

The Trustee is comfortable that the charges applicable to the Fund are in line with market practice and assess regularly whether these represent good value for members.

1.2.9. Environmental, social and governance (ESG) risks

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

1.2.10. Other non-investment risks

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

Examples for the Final Salary Section include:

- funding risk (the risk that the agreed funding plan is not borne out in practice); and
- sponsor covenant risk (the risk that, for whatever reason, the sponsoring employer is unable to support the Fund as anticipated).

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

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

2. Money purchase section

2.1. Approach to managing and monitoring investment risks

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

2.1.1. Risk of inadequate returns

In the Money Purchase Section, as members' benefits are dependent on the investment returns achieved, it is important that investment options are available which can be expected to produce adequate real returns over the longer term. Accordingly, equity and equity-based funds, which are expected to provide positive returns above inflation over the long term, have been made available to members and feature in the growth phase of the default strategy. To reduce the chance of a sharp deterioration in members' benefits close to retirement, the Trustee has made the default option a "lifestyle" strategy.

2.1.2. Risk from lack of diversification

This is the risk that failure of a particular investment, or the general poor performance of a given investment type, could materially adversely affect assets. The Trustee believes that the Fund's Money Purchase default strategy is adequately diversified between different asset classes and within each asset class and the Money Purchase options provide a suitably diversified range for members to choose from. This was key consideration when determining the Fund's investment arrangements and is monitored by the Trustee on a regular basis.

2.1.3. Liquidity/marketability risk

For the Money Purchase Section, this is the risk that core financial transactions, such as investing members' contributions, are not processed promptly due to lack of liquidity in the investments. The Trustee manages this risk by only using pooled funds with daily dealing within the default strategy and diversifying the strategy across different types of investment.

2.1.4. Investment manager risk

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

2.1.5. Risk from excessive charges

Within the Money Purchase Section, if the investment management charges together with other charges levied on, for example, transfers or early retirement are excessive, then the value of a member's account will be reduced unnecessarily. The Trustee is comfortable that the charges applicable to the Fund are in line with market practice and assess regularly whether these represent good value for members.

2.1.6. Credit risk

This is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation.

The Money Purchase Scheme is subject to credit risk because a number of options available to members invest in bonds. Credit risk is mitigated by the investment managers ensuring that the relevant portfolios have a diversified exposure to different credit issuers.

2.1.7. Currency risk

The Money Purchase Section is subject to currency risk because some of the options available involve investing in overseas markets. Members should consider their overseas currency exposure in the context of their overall investment strategy. The Trustee believes that the currency exposure that exists within the default strategy diversifies the strategy and is appropriate. Furthermore, a number of the options available manage the amount of currency risk by hedging currency exposure.

2.1.8. Environmental, social and governance (ESG) risks

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

2.1.9. Other non-investment risks

The Trustee recognises that there are other, non-investment, risks faced by the Fund, and takes these into consideration as far as practical.

For the Money Purchase Section, the Trustee has conducted due diligence into areas such as the structure of funds available to members, risk management processes of the fund managers and custodian arrangements. The Trustee is therefore satisfied with the security of assets held within this section and believes that the impact of the Financial Service Compensation Scheme not applying in certain circumstances is a relatively remote risk.