BROADSTONE

BDO Pension Scheme – DB Section

Statement of Investment Principles

July 2020

1. Introduction

This Statement of Investment Principles has been drawn up by the Trustee of the BDO Pension Scheme ("The Scheme") in accordance with Section 35 of the Pensions Act 1995, amended by Section 244 of the Pensions Act 2004 and the Occupational Pension Schemes (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.

The areas covered in this statement are:

Section 2. The Decision Making Process
Section 3. Investment Objectives
Section 4. Investment Strategy
Section 5. Cash flow and Rebalancing
Section 6. Expected Return
Section 7. Investment Manager Structure
Section 8. Investment Monitoring
Section 9. Portfolio Turnover Costs
Section 10. Corporate Governance
Section 11. Environmental, Social and Governance (ESG)
Section 12. Conflict of Interests
Section 13. Incentivisation of Investment Managers
Section 14. Employer Related Investments
Section 15. Risks
Section 16. Fee Structures
Section 17. Best Practice Principles

2. The Decision Making Process

The Trustee

The investment of the Scheme's assets is the responsibility of the Trustee and the Scheme Rules gives the Trustee broad powers on investment. There are no restrictions (however expressed) on any power to make investments by reference to the consent of the Employer.

The Trustee's policy is to seek professional advice on investment strategy. It decides on the investment strategy after considering investment advice from the Investment Consultant. The Trustee recognises that its level of investment expertise must be kept under review in order to be able to critically evaluate this advice.

The Trustee Directors meet regularly and ensure that adequate time is set aside to discuss investment issues. In determining their investment strategy, the Trustee Directors address:

- the need to consider a full range of asset classes,
- the risks and rewards of a range of alternative asset allocation strategies,
- the suitability of each asset class,
- the need for appropriate diversification, and
- the Scheme's Investment Objectives.

The Investment Consultant

The Investment Consultant advises on an investment strategy appropriate to the investment objectives. The Investment Consultant also monitors and reports on the performance of the Investment Managers.

The Investment Consultant is paid a fee for its advice and its appointment is reviewed from time to time by the Trustee.

Broadstone Corporate Benefits Limited has been appointed as Investment Consultant to the Trustee on the basis that the Trustee Directors believe it to be suitably qualified and has the appropriate knowledge and experience of the management of the investments of such schemes.

Broadstone Corporate Benefits Limited is authorised and regulated by the Financial Conduct Authority.

The Employer

The Trustee will consult with the Employer as part of the process for deciding on the investment strategy.

Delegation

The Trustee has a policy of delegating all day-to-day powers of investment to the Investment Managers who are authorised and regulated under the Financial Conduct Authority.

The safe custody of the Scheme's assets is delegated to professional custodians via the use of pooled vehicles.

3. Investment Objectives

Funding Objective

The primary funding objective of the Scheme is to ensure, as far as possible, that there are sufficient assets to provide benefits to the Scheme members as and when these fall due.

Investment Objectives

The Trustee's high level objectives with regard to investing the Scheme assets are to:

- achieve a return which is sufficient, over the longer term, to meet the Funding Objective.
- adopt an approach that recognises the need to balance risk with the achievement of a satisfactory investment return.

Performance Objective

The Investment Managers have each been set Performance Objectives to achieve returns in line with, or in excess of, a benchmark.

4. Investment Strategy

The most recent investment strategy review was conducted during the second quarter of 2019.

Given the investment objectives, the Trustee has agreed the following strategic asset allocation:

	Strategic Asset Allocation
Global Equities	10.0%
Diversified Growth Funds	30.0%
Property	5.0%
Diversified Alternatives	15.0%
Multi-Asset Credit	14.0%
Growth Assets	**74.0%**
Liability Driven Investments	26.0%
Matching Assets	**26.0%**
Total Assets	**100.0%**

The total allocation of 26.0% to liability driven investments corresponds to c.90% of liabilities hedged against changes in interest rates and inflation on a Technical Provisions basis.

The assets are held in a combination of pooled funds and are fully and readily realisable.

The Trustee agreed the range of funds used in the strategy taking into account the maturity of the liabilities. The Trustee is satisfied that the funds selected are consistent with their investment objectives and that the range agreed is sufficiently robust to allow easy adjustment between the funds as the risk appetite changes and the Scheme matures.

The Trustee may from time to time decide to change the funds used within the overall investment strategy and the investment allocation between the funds, as alternatives emerge, funds change, and the Scheme develops.

5. Cash flow and Rebalancing

New money will be invested (or disinvestments required for cash flow purposes) on a mechanical basis to bring the asset allocation back to the benchmark strategy as far as possible.

The Trustee is mindful of the need to rebalance the assets of the Scheme in line with the Scheme's strategic benchmark asset allocation. The Trustee will monitor the Scheme's actual asset allocation on a regular basis and will decide on a course of action, which may involve redirecting cash flows, a switch of assets, or taking no action, taking into account advice from the Investment Consultant.

6. Expected Return

The Trustee expects the return on assets to be consistent with the investment objective and investment strategy outlined above.

The Trustee expects to generate a return over the long term in a range of 2.4% to 2.8% per annum (net of expenses) above Cash (LIBOR)/long-term Gilt. This return is a 'best estimate' of future returns that has been arrived at given the Scheme's longer term asset allocation and in the light of advice from the Investment Consultant.

The Trustee recognises that over the short-term performance may deviate significantly from this long-term expectation. This 'best estimate' will also generally be higher than the estimate used for the Actuarial Valuation of the Scheme's liabilities. For this purpose a more prudent estimate of returns will generally be used, agreed by the Trustee on the basis of advice from the Scheme Actuary.

7. Investment Manager Structure

Platform provider

The Trustee has appointed Mobius Life Limited ("the Platform Provider") to provide a platform for the majority of the Scheme's assets. The Platform Provider is regulated under the Financial Conduct Authority and the Prudential Regulation Authority and has been selected in order to effect cost and operational efficiencies in the management of the assets. The Trustee utilises Mobius Life to access the Insight Investment, Invesco Asset Management, Legal & General Investment Management ('LGIM'), Partners Group, Columbia Threadneedle and Vontobel Asset Management, fund investments. The Investment Managers are regulated under the Financial Conduct Authority. The Trustee entered into a contract with Mobius Life Limited in August 2019.

Investment Managers

The Trustee entered into a contract with Cohen & Steers in November 2019 with respect to the Diversified Real Assets Strategy fund holding. The Trustee has decided to invest in pooled funds, other collective investment vehicles, and cash. The Scheme does not invest directly in stocks, shares, bonds, derivatives etc.

The Trustee has decided to invest in pooled funds because:

- the Scheme is not large enough to justify direct investment in equities or bonds on a cost-effective basis;
- pooled funds allow the Scheme to invest in a wider range of assets which serves to reduce risk; and
- pooled funds provide a more liquid form of investment than certain types of direct investment.

The Investment Managers appoint individual custodians to hold the securities owned by the Scheme.

8. Investment Monitoring

The Trustee employs Broadstone to assist in monitoring the performance of the Scheme's investment strategy and Investment Managers.

The platform provider provides the Trustee with monthly reports setting out a valuation of the funds on the platform and Cohen & Steers provide a monthly valuation for the Diversified Real Assets Strategy fund.

The Investment Consultant attends Trustee meetings in order to report on the Investment Managers' activity and performance, provide advice to the Trustee and to answer any questions the Trustee may have.

The Investment Managers will supply the Investment Consultant with sufficient information when requested in order to monitor financial and non-financial performance.

9. Portfolio Turnover Costs

The Trustee expects the Investment Managers 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 Trustee therefore does not set a specific portfolio turnover target for their strategy or the underlying funds.

The Investment Managers when requested by the Investment Consultant shall provide information on portfolio turnover and associated costs so that this can be monitored, as appropriate.

10. Corporate Governance

The Trustee wishes to encourage best practice in terms of activism. The Trustee accepts that by using pooled investment vehicles the day-to-day application of voting rights will be carried out by the Investment Managers. Consequently, the Trustee expects the Scheme's Investment Managers to adopt a voting policy that is in accordance with best industry practice.

11. Environmental, Social and Governance (ESG)

The Trustee believes that the consideration of financially material Environmental (including climate change), Social and Governance (ESG) factors in investment decision making can lead to better risk adjusted investment returns. The Trustee expects its Investment Managers, when exercising discretion in investment decision making, to take financially material ESG factors into account. On an ongoing basis the Trustee assesses the ESG integration capability of its Investment Managers.

The Trustee believes that in order to protect and enhance the value of the investments, during the period over which the benefits are paid, it must act as a responsible asset owner. The Trustee expects its Investment Managers to exercise its ownership rights, including voting and engagement rights, in order to safeguard sustainable returns over this time frame. On an ongoing basis the Trustee assesses the stewardship and engagement activity of its Investment Managers.

Where ESG factors are non-financial (i.e. they do not pose a risk to the prospect of the financial success of the investment) the Trustee believes these should not drive investment decisions. The Trustee expects its Investment Managers, when exercising discretion in investment decision making, to consider non-financial factors only when all other financial factors have been considered and in such a circumstance the consideration of non-financial factors should not lead to a reduction in the efficiency of the investment. Members' views are not sought on non-financial matters (including ESG and ethical views) in relation to the selection, retention and realisation of investments.

Responsibility for monitoring the makeup and development of the capital structure of investee companies is delegated to the Investment Managers. The Trustee expects the extent to which the Investment Managers monitor capital structure to be appropriate to the nature of the mandate.

12. Conflicts of Interest

The Trustee maintains 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 Managers, while also setting out a process for their management.

13. Incentivisation of Investment Managers

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

The Trustee does not directly incentivise the Investment Managers to align the approach they adopt for a particular fund with the Trustee's policies and objectives. Instead, the Investment Managers and the funds are selected so that, in aggregate, the returns produced are expected to meet the Trustee's objectives.

Neither does the Trustee directly incentivise the Investment Managers 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 Trustee expects 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.

14. Employer Related Investments

The Trustee's policy is not to hold any employer-related investments as defined in the Pensions Act 1995, the Pensions Act 2004 and the Occupational Pension Scheme (Investment) Regulations 2005.

15. Risks

The Trustee recognises that a number of risks are involved in the investment of the assets of the Scheme. They have identified the following principal risks which have the potential to cause deterioration in the Scheme's funding level:

- Solvency risk: The risk that the Scheme has insufficient assets to meet all its liabilities as they fall due.
- Mismatching risk: The risk of a significant difference in the sensitivity of asset and liability values to changes in financial and demographic factors.
- Manager risk: The failure by the Investment Managers to achieve the rates of investment return assumed.
- Liquidity risk: The risk of a shortfall of liquid assets relative to the Scheme's immediate liabilities.
- Custodian risk: The risk of failed or inadequate performance by the custodian.
- Concentration Risk: The risk that the performance of any single investment that constituted a large proportion of the assets would disproportionately influence the overall level of assets.
- Political risk: The financial risk that a country's government will suddenly change its policies.
- Sponsor risk: The possibility of failure of the Scheme's sponsoring employers.
- Counterparty risk: The risk that other parties in any trade or position will default, i.e. will renege on their contractual obligations, resulting in a financial loss to the Scheme.

Due to the complex and interrelated nature of these risks, the Trustee considers the majority of these risks in a qualitative rather than quantitative manner as part of each formal investment strategy review. Some of these risks may also be modelled explicitly during the course of such reviews.

The policy of the Trustee is to monitor, where possible, these risks on a regular basis. The Trustee therefore considers:

- The actual funding level versus the Statutory Funding Objective.
- Actual performance versus the Scheme's investment and funding objectives.
- Investment Managers' performance versus their respective benchmarks and targets.
- Any significant issues with the Investment Manager that may impact their ability to meet investment performance objectives set by the Trustee.

16. Fee Structures

The Investment Managers are paid a management fee on the basis of assets under management. The Platform Provider is paid a fee on the basis of assets held on the platform. The Investment Consultant is paidon a fixed fee basis and project work basis (which can be fixed fee or time cost based), as negotiated by the Trustee in the interests of obtaining best value for the Scheme.

The appropriateness of the Investment Managers' 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.

17. Best Practice Principles

In October 2008, the Government published the results of its consultation on revisions to the Myners' principles in response to recommendations made by the National Association of Pension Funds (NAPF) in 2007. This takes the form of six high level 'Best Practice' principles set out below, supported by best practice guidance and trustee tools that can be used to assess compliance.

1. Effective decision-making
2. Clear objectives
3. Risk and Liabilities
4. Performance assessment
5. Responsible ownership
6. Transparency and Reporting

The Trustee periodically reviews the compliance with the best practice Principles. The Trustee believes that it complies with the spirit of the Principles. There may be some instances of deviation from the published 'Best Practice Guidance' on the Principles where the Trustee believes this to be justified.

18. Review of this Statement

The Trustee will review this Statement at least once every three years and without delay after any significant change in investment policy. Any change will only be made after having obtained and considered the written advice of someone who the Trustee reasonably believes to be qualified by their ability in, and experience of, financial matters and to have the appropriate knowledge and experience of the management of pension scheme investments.

Richard Faulkner

For and on behalf of BDO Pension Trustees No2 Limited

28 July 2020

Date

Stuart Collins

For and on behalf of the Employer

23 July 2020

Date