

# University of Reading Pension Scheme

## Statement of Investment Principles

28 July 2025

# Contents

1. Introduction .....	3
2. Choosing investments.....	3
3. Investment objectives .....	4
4. Kinds of investments to be held .....	4
5. The balance between different kinds of investments.....	4
6. Risks.....	5
7. Expected return on investments .....	6
8. Realisation of investments .....	6
9. Financially material considerations, non-financial matters, the exercise of voting rights and engagement activities .....	6
10. Investment Manager Appointments and Engagement.....	7
11. Monitoring .....	8
12. Agreement .....	9
Appendix 1 Note on investment policy in relation to the current Statement of Investment Principles dated 27 June 2024	
1. The balance between different kinds of investment.....	10
2. Default option .....	11
3. Alternative investment options .....	13
4. Fee agreements .....	16
Appendix 2 Financially material considerations, non-financially material considerations, the exercise of voting rights and engagement activities	
1. Financially Material Considerations.....	17
2. Non-financially material considerations.....	18
3. The exercise of voting rights .....	18
4. Engagement activities.....	19

# 1. Introduction

- 1.1. This Statement of Investment Principles (“the Statement”) has been prepared by the Trustees of the University of Reading Pension Scheme (“the Trustees”) and relates to the defined contribution (DC) benefits provided through the University of Reading Pension Scheme (“the Scheme”). The Statement sets down the principles which govern the decisions about the investments that enable the Scheme to meet the requirements of:
  - the Pensions Act 1995, as amended by the Pensions Act 2004; and
  - the Occupational Pension Schemes (Investment) Regulations 2005 as amended by the Occupational Pension Schemes (Investment) (Amendment) Regulations 2010 and the Occupational Pension Schemes (Charges and Governance) Regulations 2015.
  - the Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018.
  - the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019.
- 1.2. In preparing this statement the Trustees have consulted the University of Reading, the Principal Employer, and obtained advice from Barnett Waddingham LLP, the Trustees’ investment consultants. Barnett Waddingham LLP is wholly owned by Howden UK&I Jersey Limited. Barnett Waddingham is authorised and regulated by the Financial Conduct Authority.
- 1.3. This statement has been prepared with regard to the 2001 Myners review of institutional investment (including subsequent updates).
- 1.4. The Trustees will review this Statement at least every three years or if there is a significant change in any of the areas covered by the Statement or the demographic profile of members.
- 1.5. The investment powers of the Trustees are set out in Clause 17 of the Definitive Trust Deed and Rules, dated 14 July 2011. This statement is consistent with those powers.

# 2. Choosing investments

- 2.1. The Trustees carefully consider their Investment Objectives, shown in Appendix 1, when designing the range of investment options to offer to Scheme members. The Trustees also acknowledge that members will have different attitudes to risk and different aims for accessing their retirement savings – and therefore, whilst seeking good member outcomes net of fees, they also consider the level of risk that is appropriate based on the anticipated needs of the membership profile of the Scheme.
- 2.2. The Trustees’ policy is to set the overall investment objectives (as outlined at the beginning of Appendix 1) and then monitor the performance of their investment managers against those objectives. The Trustees’ policy is to offer a default investment arrangement suitable for the Scheme’s membership profile plus a core range of investment strategies and funds into which members can choose to invest their contributions and those contributions made by the employer. Details of these are given in Appendix 1. In doing so, the Trustees consider the advice of their professional advisers, whom they consider to be suitably qualified and experienced for this role.
- 2.3. The day-to-day management of the Scheme’s assets is delegated to Aviva. The Scheme’s investment managers as selected by the Trustees are detailed in Appendix 1 to this Statement. The investment

managers are authorised and regulated by the Financial Conduct Authority, and are responsible for stock selection and the exercise of voting rights.

- 2.4. The Trustees review the appropriateness of the Scheme's investment strategy on an ongoing basis. This review includes consideration of the continued competence of Aviva and the investment managers with respect to their performance within any guidelines set. The Trustees will also consult the employer before amending the investment strategy.

### 3. Investment objectives

- 3.1. The Trustees have discussed and agreed key investment objectives in light of an analysis of the Scheme's membership profile as well as the constraints the Trustees face in achieving these objectives. These are set out in Appendix 1.

### 4. Kinds of investments to be held

- 4.1. The Scheme is permitted to invest in a wide range of assets including equities, bonds, cash, property and alternatives.

### 5. The balance between different kinds of investments

- 5.1. The Trustees have made available a range of investment options. These include lifestyle strategies in which a member's assets are automatically invested in line with a pre-determined strategy that changes at different stages of membership. For example, whilst a member is a long way off accessing their retirement savings, emphasis is placed on medium to higher risk funds (i.e. investment largely in growth assets) in search of long-term, inflation-protected growth. As the member's target retirement date approaches, their retirement savings are progressively switched to hold a larger proportion of lower risk assets so as to protect the value of the retirement savings relative to the way in which they are expected to be accessed.
- 5.2. Members can choose to invest in any of the funds detailed in Appendix 1. Where members do not choose where their contributions, and those made on their behalf by the employer, are invested, the Trustees will invest these contributions according to the default investment strategy set out in Appendix 1.
- 5.3. The Trustees consider the merits of both active and passive management for the various elements of the Scheme's portfolio and may select different approaches for different asset classes.
- 5.4. The Trustees are aware that the appropriate balance between different kinds of investments will vary over time and the asset allocation may change as the membership profile evolves.

## 6. Risks

- 6.1. Risk in a defined contribution scheme lies with the members themselves. The Trustees have considered a number of risks when designing and providing suitable investment choices to members. A comprehensive list of risks is set out in the Trustees' risk register, however, the main investment risks affecting all members are:

---

<b>Inflation risk</b>	The risk that the investments do not provide a return at least in line with inflation, thus eroding the purchasing power of the retirement savings. The Trustees make available investment options that are expected to provide a long-term real rate of return.
<b>Conversion risk</b>	The risk that fluctuations in the assets held, particularly in the period before retirement savings are accessed, lead to uncertainty over the benefit amount likely to be received. In the lifestyle arrangements made available through the Scheme (see Appendix 1), the Trustees change the proportion and type of investments so that in the run up to retirement the investments gradually start to more closely match how the Trustees expect members to access their retirement savings. The Trustees keep under review the appropriateness of the strategies.
<b>Retirement income risk</b>	<p>The risk that a member's retirement income falls short of the amount expected, whether this is due to lower investment returns than expected or insufficient contributions being paid. The Trustees periodically review the appropriateness of the investment options offered to ensure member outcomes can be maximised.</p> <p>Communications to members will seek to encourage them to regularly review the level of their contributions, but ultimately this is a risk which lies with each member.</p>
<b>Liquidity risk</b>	This is the risk that assets cannot be traded quickly in the market without significantly impacting the price of the asset. This risk may be present due to holding illiquid assets. The Trustees will review the allocation made to such assets to ensure it remains appropriate.
<b>Investment manager risk</b>	The Trustees monitor the performance of Aviva and the Scheme's underlying investment managers on a regular basis in addition to having meetings with them from time to time as necessary. The Trustees have a written agreement with Aviva that contains a number of restrictions on how they operate the Scheme's investments.
<b>Concentration/Market risk</b>	Each investment manager is expected to manage properly diversified portfolios and to spread assets across a number of individual shares and securities.
<b>Currency risk</b>	The Scheme may gain exposure to overseas currencies by investing in assets that are denominated in a foreign currency or via currency management.

---

---

## **Loss of investment**

The risk of loss of investment by the investment managers and their custodians is assessed by the Trustees. This includes losses beyond those caused by market movements (e.g. default risk, operational errors or fraud). The Trustees also undertake an annual review of the internal controls and processes of the investment managers.

---

## **7. Expected return on investments**

- 7.1. The Trustees have regard to the relative investment return, net of fees, and risk that each asset class is expected to provide. The Trustees are advised by their professional advisers on these matters, whom they have deemed to be appropriately qualified. However, the day-to-day selection of investments is delegated to the investment managers.
- 7.2. The Trustees have selected Aviva as the investment manager following a robust selection process and offers a series of 'off-the-shelf' investment strategies that have been designed and implemented by Aviva. The Trustees have delegated the day-to-day management of these off-the-shelf strategies to Aviva, who manage the strategies with reference to a pre-set range of investment parameters and is responsible for the day-to-day selection of investments.
- 7.3. The Trustees review the performance of Aviva, and the range of off-the-shelf strategies, at least quarterly to ensure they perform in line with expectations. This review takes account of the returns achieved and the likely aims and objectives of members.
- 7.4. The Trustees recognise the need to distinguish between nominal and real returns and to make appropriate allowance for inflation when making decisions and comparisons.

## **8. Realisation of investments**

- 8.1. The Trustees have delegated the responsibility for buying and selling investments to the investment managers.

## **9. Financially material considerations, non-financial matters, the exercise of voting rights and engagement activities**

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

## 10. Investment Manager Appointments and Engagement

### Incentivising alignment with the Trustees' investment policies

- 10.1. Prior to appointing an investment manager, the Trustees discuss the investment manager's approach to the management of ESG and climate related risks with the Scheme's investment consultant, and how their policies are aligned with the Trustees' own investment beliefs.
- 10.2. When appointing an investment manager, in addition to considering the investment manager's investment philosophy, process and policies to establish how the manager intends to make the required investment returns, the Trustees also consider how ESG and climate risk are integrated into these. If the Trustees deem any aspect of these policies to be out of line with their own investment objectives for the part of the portfolio being considered, they will consider using another manager for the mandate.
- 10.3. The Trustees carry out a strategy review at least every three years where they assess the continuing relevance of the strategy in the context of the Scheme's membership and their aims, beliefs and constraints. The Trustees monitor the investment managers' approach to ESG and climate related risks on an annual basis.
- 10.4. If the investment objective for a particular manager's fund changes, the Trustee will review the appointment to ensure it remains appropriate and consistent with the Trustees' wider investment objectives. In relation to multi-client pooled funds used by the DC Section, the Trustees' accept that they have no ability to specify the risk profile and return targets of the manager, but appropriate mandates can be selected to align with the overall investment strategy.

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

- 10.5. When considering the management of objectives for investment managers (including ESG and climate risk objectives), and then assessing their effectiveness and performance, the Trustees assess these over a rolling timeframe. The Trustees believe the use of rolling timeframes, typically 3 to 5 years, is consistent with ensuring the investment managers make decisions based on an appropriate time horizon. Where a fund may have an absolute return or shorter term target, this is generally supplementary to a longer term performance target. In the case of assets that are actively managed, the Trustees expect this longer term performance target to be sufficient to ensure an appropriate alignment of interests.
- 10.6. The Trustees expect investment managers to be voting and engaging on behalf of the Scheme's holdings and the Scheme monitors this activity within the Implementation Statement in the Scheme's Annual Report and Accounts. The Trustees do not expect ESG considerations to be disregarded by the investment managers in an effort to achieve any short term targets.

### Method and time horizon for assessing performance

- 10.7. The Trustees receive investment manager performance reports on a quarterly basis, which present performance information over various time periods. The Trustees review the absolute performance of the relevant funds, as well as their relative performance versus a suitable benchmark index (where appropriate) and against the manager's stated performance targets (over the relevant time period). The Trustees' focus is on long term performance but short term performance is also reviewed

- 10.8. The Scheme invests exclusively in pooled funds. The investment managers are remunerated by the Trustees based on the assets they manage on behalf of the Trustees. As the funds grow, due to successful investment by the investment managers, they receive more and as values fall they receive less.
- 10.9. The Trustees believe that this fee structure enables the investment managers to focus on long-term performance without worrying about short term dips in performance significantly affecting their revenue.
- 10.10. The Trustees ask the Scheme's investment consultant to assess if the asset management fee is in line with the market when the manager is selected, and the appropriateness of the annual management charges are considered regularly as part of the review of the Statement of Investment Principles.

### Portfolio turnover costs

- 10.11. The Trustees acknowledge that portfolio turnover costs can impact on the performance of their investments. Overall performance is assessed as part of the quarterly investment monitoring process.
- 10.12. During the investment manager appointment process, the Trustees may consider both past and anticipated portfolio turnover levels. When underperformance is identified, deviations from the expected level of turnover may be investigated with the investment manager concerned if it is felt they may have been a significant contributor to the underperformance. Assessments reflect the market conditions and peer group practices.
- 10.13. The Trustees expect Aviva to periodically report on the costs incurred in managing the DC Section's assets and this includes the costs associated with portfolio turnover. The Trustees formally review the reported portfolio turnover costs, at least annually, as part of the preparation of the Chair's Annual Statement.

### Duration of arrangement with asset managers

- 10.14. For the open-ended pooled funds in which the Scheme invests, there are no predetermined terms of agreement with the investment managers.
- 10.15. The suitability of the Scheme's asset allocation and its ongoing alignment with the Trustees' investment beliefs is assessed every three years, or when changes deem it appropriate to do so more frequently. As part of this review the ongoing appropriateness of the investment managers, and the specific funds used, is assessed.

## 11. Monitoring

- 11.1. **Investment Performance:** The Trustees review the performance of each investment option offered through the Scheme against the stated performance objective and, in doing this, the Trustees receive a performance monitoring report on a regular basis. This monitoring takes into account both short-term and long-term performance. The investment managers' overall suitability for each mandate will be monitored as frequently as the Trustees consider appropriate in light of both its performance and other prevailing circumstances.
- 11.2. **Objectives:** The Trustees monitor the suitability of the objectives for the Scheme (as detailed in Appendix 1) and performance (net of fees) against these objectives at least every three years and also when there is any significant change in the investment policy, underlying economic conditions or the profile of the members.

- 11.3. **Investment Choices:** The Trustees monitor the ongoing appropriateness of the investment choices offered on a periodic basis.
- 11.4. **Engagement and Stewardship:** The Trustees monitor the engagement and stewardship activities undertaken by the investment managers on an annual basis. The Trustees also have a Stewardship policy, which it refers to in making investment decisions. This is reviewed periodically.

## 12. Agreement

- 12.1. This Statement was agreed by the Trustees, and replaces any previous statements. Copies of this Statement and any subsequent amendments will be made available to the employer, Aviva, and the Scheme auditor upon request.

**Signed:**.....

**Date:**.....

**On behalf of the Trustees of the University of Reading Pension Scheme**

# Appendix 1 Note on investment policy in relation to the current Statement of Investment Principles dated 24 July 2025

## 1. The balance between different kinds of investment

The Trustees' main investment objectives are:

- to provide a suitable default investment option that is likely to be suitable for a typical member;
- to offer an appropriate range of alternative investment options so that members who wish to make their own investment choices have the freedom to do so, recognising that members may have different needs and objectives;
- seek to achieve good member outcomes net of fees and subject to acceptable levels of risk.

The Trustees are responsible for the design of the default investment option and for choosing which investment options to make available to members. Members are responsible for their own choice of investment options (including where the default investment option is selected for them because they have not selected other funds).

The Trustees have made available a range of funds to suit the individual needs of the Scheme's members. For example, equity funds are available for those members willing to accept a greater level of volatility in pursuit of higher expected retirement savings. Bond and cash funds are also offered for those members who are less comfortable with the equity funds.

Alternatively, the Trustees have made available lifestyle arrangements, whereby a member's assets are automatically invested in line with a pre-determined strategy that changes as the member gets closer to accessing their retirement savings. Emphasis is placed on medium to higher risk funds (i.e. investment largely in growth assets) in search of long-term inflation-protected growth whilst the member is a long way off accessing their retirement savings, switching progressively to protection assets over the years preceding the member's target retirement date so as to protect the purchasing power of the retirement savings. The four lifestyle options are:

- My Future Focus Lifetime Investment Programme (default)
- My Future Focus Target Drawdown Lifetime Investment Programme
- My Future Focus Target Cash Lump Sum Lifetime Investment Programme
- My Future Focus Target Annuity Lifetime Investment Programme

These include a universal default option, and alternative programmes named to target either the purchase of an annuity at retirement, the purchase of a vehicle where assets can be steadily drawn down during retirement, or the withdrawal of cash at retirement.

The lifestyle arrangements are constructed from constituent Aviva funds that are also offered to members wanting to manage their own asset allocation decisions.

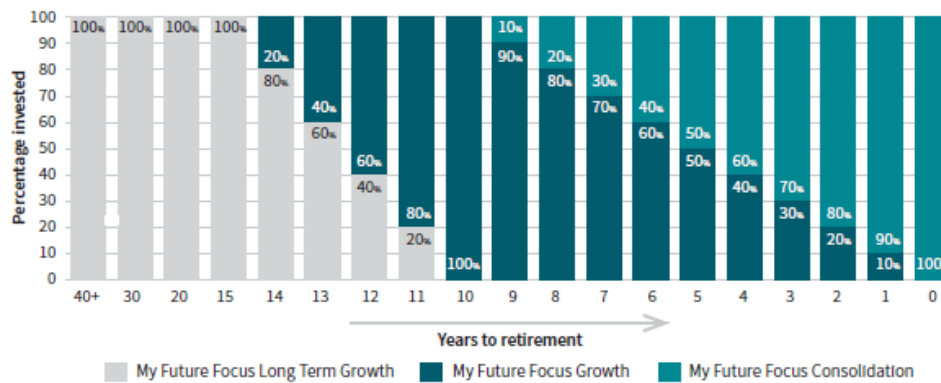
## 2. Default option

The Trustees acknowledge that members will have different attitudes to risk and different aims for accessing their retirement savings, and so it is not possible to offer a single investment option that will be suitable for each individual member. However, having analysed the Scheme’s membership profile, the Trustees found that there was no clear consensus on how members will take their benefits, although they expect the majority of members to be targeting cash and drawdown given their expected pot sizes. The Trustees therefore decided that the universal lifestyle arrangement set out below represents a suitable default investment option for the majority of members who do not make a choice about how their contributions (and those made on their behalf by the employer) are invested. The universal lifestyle arrangement (referred to by Aviva as My Future Focus Lifetime Investment Programme) is designed to be broadly appropriate regardless of how members choose to access their pension savings. The aims, objectives and policies relating to the default option are intended to ensure that assets are invested in the best interests of relevant members and their beneficiaries.

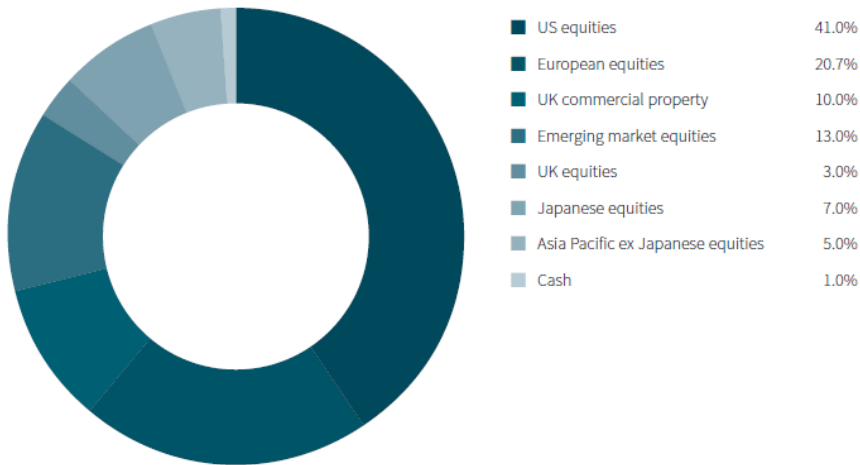
The asset allocation of the default investment option is set with reference to a member’s chosen or default retirement age and adjusts the allocation to each underlying fund over time, as set out below.

### My Future Focus ‘universal strategy’

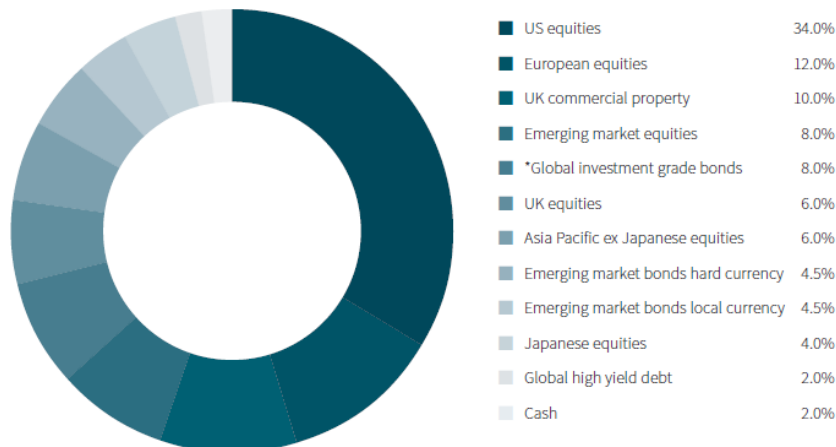
This option has been designed for members who haven’t yet decided how they want to use their pension savings and would prefer to keep their options open.



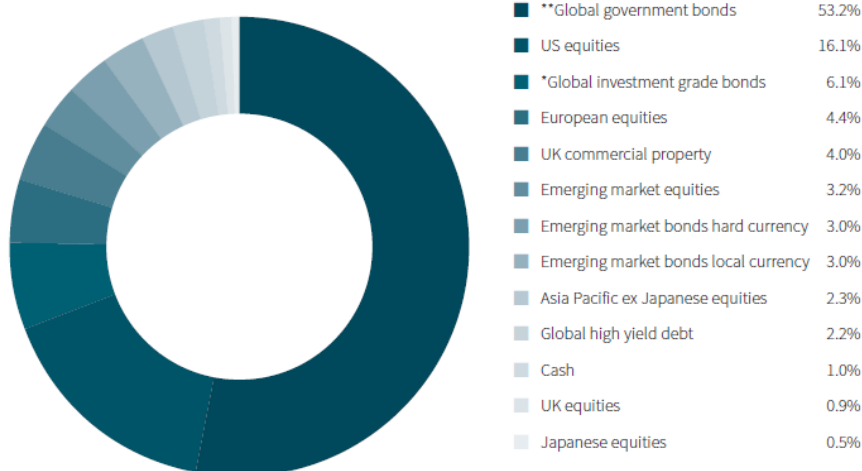
### My Future Focus Long Term Growth Fund



### My Future Focus Growth Fund



### My Future Focus Consolidation Fund



Source: Aviva

The Aviva My Future Focus Lifetime Investment Programme is designed with the assumption that individuals in this default are likely to hold higher-risk assets such as equities and property, but then also hold some lower-risk investments closer to retirement such as cash or bonds.

Investment in illiquid assets, such as property, is expected to bring certain benefits to members including diversification, return enhancement and inflation protection. The Trustees believe these advantages can outweigh the disadvantages of reduced liquidity, higher investment fees and higher investment risk. Aviva currently invests a portion of members’ funds in illiquid assets via the Aviva Pension Property Fund, which is held within some of the overarching Aviva funds.

The Trustees will consider the suitability of any material changes to the Lifetime strategies (including but not limited to illiquid assets).

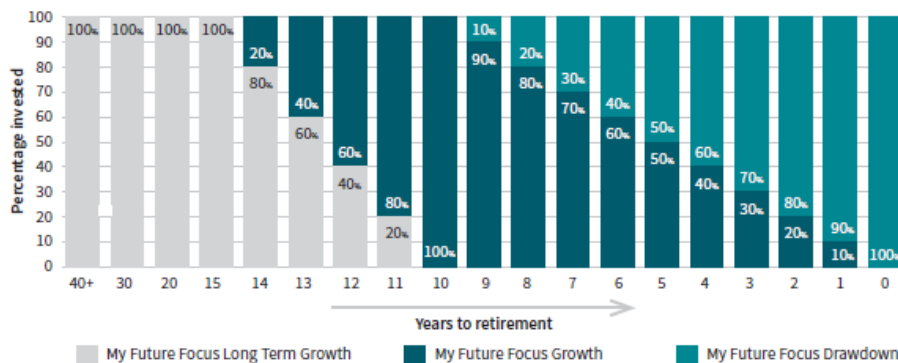
The statements made in the main body of this Statement of Investment Principles also apply to the default arrangement.

### 3. Alternative investment options

Acknowledging the challenge of identifying the best solution for different groups of members, and in focusing on its key objective, the Trustees have focused on the default strategy. Alongside the default investment option, the Trustees also make available three further lifestyle options as set out below:

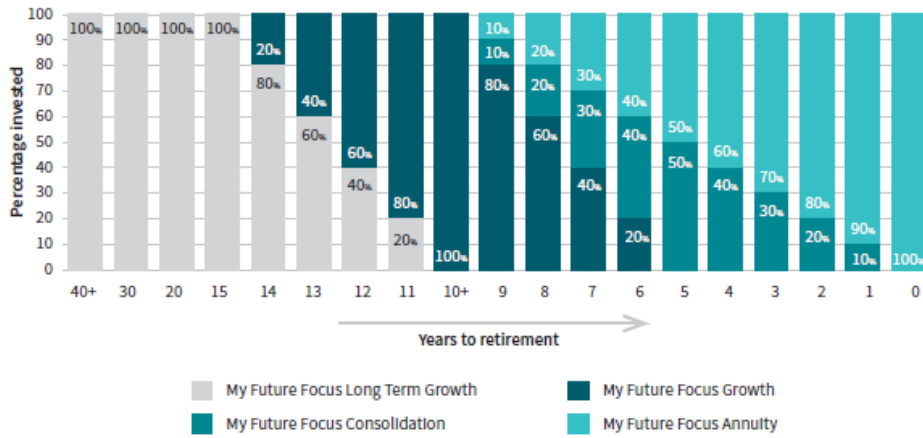
#### My Future Focus Target Drawdown option

This option has been designed for members who intend to take an income by making withdrawals directly from their pension savings, while remaining invested, by using a drawdown arrangement.



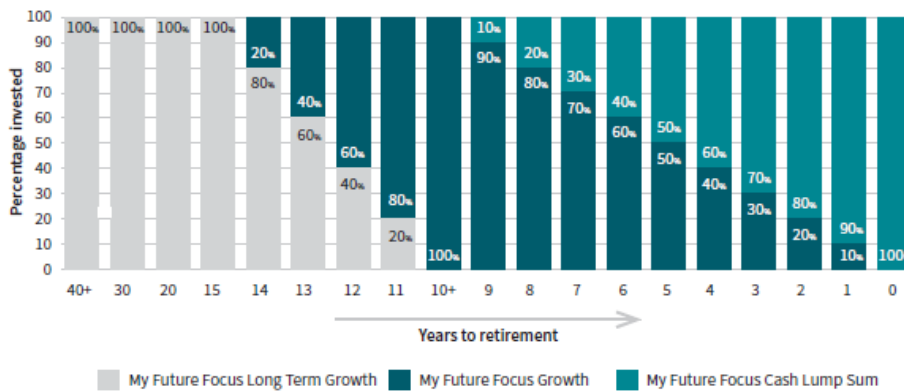
### My Future Focus Target Annuity

This option has been designed for members who intend to convert their pension savings into a regular income for life by buying an annuity. As a result, their savings will be adjusted over time to prepare for annuity purchase.



### My Future Focus Target Cash Lump Sum

This option has been designed for members who intend to take their pension savings as a cash lump sum (or sums).



Source: Aviva

Members can also self-select individual funds to invest in. The investment benchmarks and objectives for each fund are given overleaf:

Investment manager	Fund	Benchmark	Objective
Aviva	My Future Focus Long Term Growth Fund	Bank of England Base Rate +5%	To track the benchmark
	My Future Focus Growth Fund	Bank of England Base Rate +4%	To track the benchmark
	My Future Focus Consolidation Fund	Bank of England Base Rate +2%	To track the benchmark
	My Future Focus Drawdown Fund	Bank of England Base Rate +3%	To track the benchmark
	My Future Focus Cash Lump Sum Fund	Bank of England Base Rate	To track the benchmark
	My Future Focus Annuity Fund	FTSE Annuities Index (comparator)	Provide a diversified exposure to assets that reflects the broad characteristics of investments underlying a typical traditional level annuity product
Blackrock	Institutional Sterling Liquidity Fund	7 Day LIBID	To track the benchmark
L&G	Future World Global Equity Index Fund	Solactive L&G ESG Global Markets Index	To track the benchmark to within +/- 0.60% p.a. for two years out of three
	Future World Annuity Aware Fund	FTSE UK Level Annuity Single Life Standard Retirement Annuities Index (comparator)	Provide a diversified exposure to assets that reflects the broad characteristics of investments underlying a typical traditional level annuity product
HSBC	Islamic Global Equity Index	Dow Jones Islamic Market Titans 100 Index	To track the benchmark

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

## 4. Fee agreements

The fee arrangements with the investment managers are summarised below:

Investment manager	Fund	Annual Management Charge (% p.a.)
Aviva	My Future Focus Long Term Growth Fund	0.59% (AMC)
	My Future Focus Growth Fund	
	My Future Focus Consolidation Fund	
	My Future Focus Drawdown Fund	
	My Future Focus Cash Lump Sum Fund	
	My Future Focus Annuity Fund	
BlackRock	Institutional Sterling Liquidity Fund	0.49% (AMC)
L&G	Future World Global Equity Index Fund	0.765% (AMC)*
	Future World Annuity Aware Fund	0.56% (AMC)
HSBC	Islamic Global Equity Index	0.76% (AMC)

The Trustees review these charges periodically as part of the Value for Money assessments.

## Appendix 2 Financially material considerations, non-financially material considerations, the exercise of voting rights and engagement activities

### 1. Financially Material Considerations

The Trustees view Environmental, Social and Governance (ESG) factors, including climate change, as potentially financially material. The Trustees believe that the financial materiality of ESG factors may vary between asset classes. The Trustees' views on ESG integration within each asset class are outlined below:

**Passive equities** – the Trustees accept that when investing passively in equity index tracker funds that investment managers cannot screen stocks. The Trustees do believe that positive engagement on ESG issues can lead to improved risk-adjusted returns. Therefore, the Trustees look to the passive equity managers to engage positively with companies regarding ESG factors.

**Cash funds** – the Trustees do not believe there is scope for ESG issues to improve risk-adjusted returns within the Scheme's cash fund holdings.

**Multi-asset and credit funds** – the Trustees believe that ESG issues will be financially material to the risk-adjusted returns achieved by the Scheme's multi-asset funds and credit managers given these funds have a degree of active management and some scope to select stocks by ESG factors. The investment process for each multi-asset fund manager should take ESG into account in the selection, retention and realisation of investments. Further to this, the process for incorporating ESG issues should be consistent with, and proportionate to, the rest of the investment process.

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

The Trustees are aware of the different investment timeframes that members will have. Further to this, the Trustees believe that ESG issues, and particularly climate change, will be more material for members who are further from retirement. Therefore, within the Scheme's default investment strategy, the Trustees consider the financial materiality of ESG, including climate change, over various timeframes and will consider changes in relation to this as part of their periodic investment reviews.

Before considering any new mandate, the Trustees will consider whether the manager is a signatory to the United Nations supported Principles for Responsible Investment (PRI). At time of writing, Aviva and all of the Scheme's underlying investment managers are PRI signatories.

The Trustees will take advice on ESG from their advisers and report on ESG at least annually, making this available to members.

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

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

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

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

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

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

## 2. Non-financially material considerations

The Trustees do not make specific allowance for non-financial matters (such as member ethical views) within the investment strategy. However, the Trustees consider that it is important to ensure that a suitable range of funds are offered for members who wish to express an ethical preference in their pension saving and review these provisions from time to time.

## 3. The exercise of voting rights

Stewardship encompasses the exercise of rights (including voting rights) attaching to the Scheme's investments, and the engagement by and with investment managers. The Trustees delegate responsibility for stewardship activities attaching to the Scheme's investments to its investment managers. Managers are expected to exercise voting powers with the objective of preserving and enhancing long term shareholder value. In addition to the exercise of voting rights, managers are expected to engage with key stakeholders (which may include issuers of debt or equity, corporate management, regulators and governance bodies) relating to their investments in order to improve corporate behaviours and governance, improve performance and social and environmental impact and to mitigate financial risks.

The Trustees believe the stewardship policies of their key investment manager, Aviva (who exercise the majority of the voting rights on behalf of the Scheme) are aligned with the Scheme's policies on voting and engagement which forms part of this Statement of Investment Principles. The Trustees have adopted the same stewardship priorities as Aviva as the Scheme's stewardship priorities. Full details of the individual priorities are within the Scheme's latest Implementation Statement. The Trustees, with assistance from their independent investment advisor, will keep the stewardship priorities established by Aviva under review to ensure continued alignment with the Trustees' view.

The Trustees periodically review engagement activity undertaken by their investment managers to ensure that the policies outlined above are being met and may explore these issues with its investment managers as part of the ongoing monitoring of the ESG integration and stewardship activities of its investment managers.

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

## 4. Engagement activities

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

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

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

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

Should an investment manager fail in these respects, this should be captured in the Scheme's regular performance monitoring.

It is not possible for the Scheme's investment managers to invest in the Principal Employer's business.

Through their consultation with the Principal Employer when setting this Statement of Investment Principles, the Trustees have made the Principal Employer aware of their policy on ESG and climate related risks, how they intend to manage them and the importance that the pensions industry as a whole, and its regulators, place on them.

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

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

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