Statement of Investment Principles

RoSPA Retirement & Death Benefits Plan

August 2024

Contents

1. Introduction

1.1. What is the purpose of this Statement of Investment Principles ("SIP")?

This SIP sets out the policy of the Trustee of the RoSPA Retirement & Death Benefits Plan (the "Plan") on matters governing decisions about the investments of the Plan. The Plan's assets are held in trust by the Trustee. The investment powers of the Trustee are set out in the Plan's Trust Deed.

The Plan is a Registered Pension Scheme for the purpose of the Finance Act 2004.

1.2. Who has had input to the SIP?

This SIP has been formulated by the Trustee after obtaining and considering written professional advice from their investment adviser (Quantum Advisory) and consulting the Sponsoring Employer as required by the Pensions Act 1995 (the "Act") and subsequently the Occupational Pension Plans (Investment) Regulations 2005 (the “Regulations”). This SIP was prepared by Quantum Advisory, which has the knowledge and experience required to provide professional advice on the management of the investments of such plans.

2. Investment objectives and strategy

2.1. Investment policy

The Plan's assets are held in a trust by the Trustee. The investment powers of the Trustee are set out in the Plan's Trust Deed & Rules.

The Trustee is aware of the need to invest assets in the best and sole interest of the members and beneficiaries and in a manner which helps ensure that the benefits promised to members are provided. It also noted that powers of investment must be exercised in a manner calculated to ensure the security, quality, liquidity and profitability of the portfolio as a whole.

The Trustee recognises that the assets of the Plan must consist predominantly of investments admitted to trading on regulated markets and investment in assets which are not admitted to trading on such markets must, in any event, be kept to a prudent level.

2.2. Investment objective

The Trustee, with the help of their advisers and in consultation with the Sponsoring Employer, set the current investment strategy following a consideration of their objectives and other related matters in 2024.

The Trustee noted the need to invest in a manner which helps ensure that the benefits promised to members are provided. Over the long term, meeting these objectives requires that a rate of return is achieved which exceeds the rate of return available on risk-free assets to support the long-term funding plan which has been discussed with the Sponsoring Employer. In the short term, it means managing the volatility of assets relative to the value of liabilities, which have bond-like characteristics.

2.3. What did the Trustee consider in setting the Plan's investment strategy?

In setting the strategy, the Trustee considered:

- The strength of the Sponsoring Employer's covenant to support the Plan;
- The investment objective;
- The Plan's characteristics;
- The Annual Management Charges ("AMC");
- The fact that, benefits payable by the Plan (and expenses incurred) are likely to exceed contributions receivable;
- The investment managers' integration of Environmental, Social and Governance ("ESG") considerations;
- The risks and rewards of alternative asset classes and investment strategies;
- The expectation that, over the long term, equities are likely to produce higher returns than bonds, but at the risk of short-term volatility or liquidity constraints;
- The need for appropriate diversification between different asset classes in so far as appropriate to the circumstances of the Plan;
- For each asset class, the appropriateness of either active or passive management, given the efficiency, liquidity and level of transaction costs in the asset class concerned;
- The financial strength and reputation of each investment manager; and

- The financial strength of the investment managers' custodians.

2.4. What risks were considered and how are they managed?

In order to achieve their objectives, the Trustee recognises the need to invest across the risk spectrum. The Trustee identified the following investment risks:

- The risk of a deterioration in the Plan's funding level, or Sponsoring Employer covenant;
- The risk that investment returns in general will not achieve expectations;
- The risk that an investment manager will not achieve the expected rate of return;
- The risk that the value of technical provisions will increase due to unknown factors such as increased inflation and/or life expectancy;
- The risk of mis-match between the value of Plan assets and technical provisions;
- The risk of a shortfall in the liquid assets held by the Plan relative to its immediate cash flow requirements;
- The risk that the performance of any single investment within the Plan assets may disproportionately affect the ability of the Plan to meet its overall investment objectives;
- The risk of misappropriation, unauthorised use or mis-delivery of Plan assets;
- The imprecision of the ways in which risks are to be measured and managed; and
- The risk that ESG factors, including climate change, could adversely impact the value of the Plan's assets if this is misunderstood, or not given due consideration.

The Trustee recognises these different types of risk and seek to minimise them as far as possible by the use of regular monitoring of investment performance, by a deliberate policy of diversification, by taking account of future payments and by regularly reviewing the appropriateness of the prevailing strategy against the Plan objectives.

Given the complex and correlated 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 such reviews.

2.5. Financially material considerations, non-financial matters and stewardship policies

2.5.1. Financially material considerations

The Trustee acknowledges the potential impact upon the Plan's investments (both in terms of risk and return) arising from financially material matters. The Trustee define**s** these as including, but not limited to, ESG factors (including climate change).

With specific regard to ESG factors, the Trustee consider**s** how these are integrated into the investment processes when: (i) appointing new investment managers; and (ii) monitoring existing investment managers. The Trustee has provided the appointed investment managers with full discretion concerning the evaluation of ESG factors. The Trustee also periodically consider**s** publicly available ESG related publications pertaining to the incumbent investment managers.

The Trustee, with the help of their investment advisers, have determined that ESG is built into the core of its active investment manager's processes. Where the Plan's investments are implemented on a passive basis, or within Liability Driven Investments ("LDI"), the Trustee acknowledges that this restricts the ability of the manager to take active decisions on whether to hold securities based on the investment managers consideration of ESG factors. The Trustee does however expect the incumbent managers, where relevant, to utilise their position to engage with companies on these matters.

The Trustee also considers ESG factors when determining future investment strategy decisions. To date, the Trustee has not established any restrictions on the appointed investment managers but may consider this in future.

2.5.2. Stewardship

The Trustee acknowledge the constraints that they face in terms of influencing change due to the size and nature of the Plan's investments. They do, however, acknowledge the need to be responsible stewards and exercise the rights associated with their investments in a responsible manner.

The Trustee considers how stewardship factors are integrated into the investment processes when: (i) appointing new investment managers; and (ii) monitoring existing investment managers. The Trustee has provided the appointed investment managers with full discretion concerning the stewardship of their investments.

The voting and engagement for each fund is managed by the investment managers, who each have a strong history of active engagement and who were selected by the Trustee in part because of their active voting and engagement policies. Further details on the approach these funds use is provided in the Plan's Implementation Statement.

The Trustee feels that all ESG matters are important. The Trustee undertook a review of their stewardship priorities and decided to focus on managing risks associated with Climate Change, Board Accountability & Composition, and Health & Safety as they recognise that doing so can potentially help improve long-term returns for the Plan. Furthermore, the Trustee recognises that investment managers commonly provide voting information on the majority of these areas, which will allow the Trustee to assess whether or not their voting activity aligns with the Trustee's priorities. The Trustee will monitor and discuss instances where the investment managers' voting activity does not align with their priorities, and seek to understand the reasons for this in the first instance. The Trustee will then escalate the matter and may review their holding if the issue persists.

Representatives of the Plan's investment managers may be requested to attend Trustee meetings periodically, in order to present on their stewardship policies, including their implementation. The Trustee will continue to ensure that the stewardship policies of the Plan's investment managers are embedded in their investment processes.

2.5.3. Non-financial matters

The Trustee does not employ a formal policy in relation to the consideration of non-financial factors when selecting, retaining and realising investments. However, when members are forthcoming with their views on non-financial factors, the Trustee may consider these.

2.6. What is the investment strategy?

The investment strategy uses two key types of assets:

- **"return seeking assets"**: which target a rate of return in excess of the minimum risk return. Typically, these are equities or a diversified pool of other non-matching assets which, over the long term, might be expected to deliver 3% to 4% pa above the minimum risk return.

- **“matching assets”:** which are designed to hedge some of the Plan’s liabilities against changes in inflation and interest rates while still allowing exposure to return seeking assets.

A strategic asset allocation was agreed by the Trustee in 2024. The strategy aims to deliver an appropriate mix of investments which support the Plan’s investment objectives. Details of the managers, fund objectives and characteristics can be found in Appendix 2.

The Trustee recognises that the assets of the Plan must be properly diversified in such a way as to avoid excessive reliance on any particular asset, issuer or group of undertakings and to avoid accumulations of risk in the portfolio as a whole. Investments in assets issued by the same issuer or by issuers belonging to the same group must not expose the Plan to excessive risk concentration. Due to liquidity, costs and complexity reasons, the Trustee does not utilise illiquid or unregulated investments as part of the investment strategy.

2.7. Fund managers, style and target returns

The funds in which the Plan invests are pooled funds, which the Trustee believes are appropriate given the size and nature of the Plan. Details of the fund managers, styles, benchmarks and target returns used by the Plan can be found in Appendix 2.

The relationship with each investment manager is open ended and is reviewed on a periodic basis.

2.8. Re-balancing

The allocation of the Plan’s assets will be reviewed periodically and will be rebalanced according to the central benchmark on an ad hoc basis, and when investing and disinvesting for cash flow purposes as set out in section 2.9.

2.9. Cash flow management

Positive Plan cash flows are used, where possible, to rebalance back towards the Plan’s strategic benchmark.

Similarly, negative Plan cash flows (over and above payments from the Cashflow Driven Investments) will be raised from disinvesting so as to bring the assets back to their strategic benchmark.

This approach is reviewed on a periodic basis.

3. Implementation solution

3.1. What is an implementation solution and why use it?

An implementation solution is a service that enables pension plans to buy, sell and hold their investments all in one place. This allows greater flexibility and efficiency when switching investments as the Plan strategy changes or fund managers have to be replaced.

The centralisation of funds also allows consolidated reporting to be obtained more easily and more regularly, assisting in ensuring that an investment strategy and associated flight path can be effectively tracked and monitored. All of these features allow pension plans greater administrative efficiency, enhanced ease of strategy implementation and potential fee reductions.

3.2. How to access an implementation solution?

Pension plans enter into a unit linked life policy through a Trustee Investment Policy (TIP). The policy's value is linked to the underlying investments, which the implementation solution provider, in this case Mobius Life ("Mobius"), has been directed to purchase. Mobius is responsible for investing into the underlying funds and takes responsibility for the relationship with the underlying fund managers. This includes transactions, reporting and governance. This differs from a traditional relationship that a pension plan would have had with their fund managers where they would have invested directly with these managers and maintained a number of these individual relationships.

4. Appointment of investment managers

4.1. How many investment managers are there?

The Plan currently holds assets with its investment managers through Mobius. Details of the appointed investment managers, together with fund objectives and characteristics, are outlined in Appendix 1.

4.2. What formal agreements are there with the investment managers and implementation solution provider?

The Trustee selects investment managers and funds which are appropriate to implement the investment strategy.

The Trustee has signed policy documentation as appropriate with Mobius for the Plan.

The Trustee keeps the appointment of all investment managers and providers under review and will seek to replace any managers, or funds, which no longer remain appropriate to implement the Plan's investment strategy.

4.3. What are the investment managers' responsibilities?

The investment managers are responsible for the day-to-day management of the investments and are responsible for appointing custodians, if required.

The managers are authorised under the Financial Services and Markets Act 2000 to carry out such activities.

4.4. How does the Trustee review the performance and remuneration of investment managers?

The Trustee has appointed Quantum Advisory to assist in the selection and ongoing monitoring of the Plan's investment managers.

The Trustee with the assistance of Quantum Advisory will monitor the performance of each fund against its agreed objectives. The Trustee receives regular monitoring reports to assess the managers' performance.

In addition, the Trustee reviews the charges applicable to each fund on a periodic basis to ensure these continue to represent value for money.

4.5. Custodians and administrators

The Plan's investments are through pooled investment vehicles. Therefore, there is no need for the Trustee to formally appoint a custodian as the investment comprises units held in listed investment vehicles rather than the underlying stocks and shares. However, the investment managers have themselves appointed custodians for the safe custody of assets.

As the Plan invests via Mobius, custody of the assets held with managers is under the Mobius name.

5. Other matters

5.1. What is the Trustee's policy on the realisation of investments?

The investment managers have discretion over the timing of realisation of investments of the Plan and in considerations relating to the liquidity of investments.

When appropriate, the Trustee, on Quantum's recommendation, will decide on the amount of cash required for any outgoings and inform the investment managers of any liquidity requirements. In the first instance, the realisation of investments will be used to rebalance funds to the target asset allocation set out in Appendix 1 and in accordance with the approach set out in paragraph 2.9.

5.2. How are the various parties who are involved in the investment of the Plan's assets remunerated?

Quantum is remunerated on an agreed fee basis. Quantum does not receive commission.

The Plan invests in pooled funds. The Trustee notes that the investment strategy and decisions of the fund managers cannot be tailored to the Trustee's policies and the managers are not remunerated directly on this basis. However, the Trustee, with the help of Quantum, set the investment strategy for the Plan and select appropriate managers and funds to implement the strategy.

The Trustee does not directly incentivise the investment managers to engage with the issuers of debt or equity to improve their performance. The Trustee does, however, expect the investment managers to participate in such activities as appropriate and necessary to meet the investment objectives of the respective fund. The investment managers' engagement with the issuers of debt or equity is expected to be undertaken in order to promote medium-to-long term value creation.

The Trustee considers the fees and charges associated with each investment before investing.

The investment managers are remunerated on an ad valorem fee basis, which is calculated as a fixed percentage of the total value of the Plan's funds they hold under management. This structure has been chosen to align the fund managers' interests with those of the Plan.

In addition, the fund managers pay commissions to third parties on many trades they undertake in the management of the assets. The Trustee obtains an annual statement from the investment managers setting out all the costs of the investments of the Plan.

5.3. Does the Trustee take any investment decisions on their own?

The Trustee is responsible for the investments of the Plan's assets. They take some decisions themselves and delegate some to others.

When deciding which decisions to make themselves and which to delegate, the Trustee considers whether they have the appropriate training and expertise in order to make an informed decision.

The Trustee has established the following decision-making structure:

Trustee

- Set structures and processes for carrying out their role.

- Agree structure for implementing investment strategy.
- Select and monitor planned asset allocation.
- Select and monitor investment advisers and fund managers.
- Select and monitor direct investments.
- Prepare and maintain the Statement of Investment Principles.

Investment adviser

- Advise on all aspects of the investment of the Plan's assets, including implementation.
- Advise on this Statement.
- Provide required training.

Investment (or fund) managers

- Operate within the terms of this Statement and the written contracts and agreements.
- Select individual investments with regard to their suitability and diversification for the individual pooled vehicles.
- Ensure the suitability of the chosen benchmark for the respective investment vehicle.

5.4. Conflicts of interest

The Trustee considers any potential and actual conflicts of interest (subject to reasonable levels of materiality) at the start of each Trustee meeting and document these in the minutes. In addition, the Trustee undertakes an annual review of the investment managers' conflicts of interest policies in the Plan's Implementation Statement.

5.5. Capital structure of investee companies

The responsibility for monitoring the capital structure of investee companies (including any relevant developments) is delegated to the investment managers. Investment managers are expected to partake in a sufficient level of monitoring and action that is appropriate to the nature of the mandate.

6. Review

6.1. How often are investments reviewed?

The Plan strategy reviews are undertaken periodically. A review of the Plan typically occurs alongside triennial actuarial valuations of the Plan; but more frequent reviews can occur in light of a material change of circumstances, or if required by the Pensions Regulator. Any change in investment strategy may necessitate a change in investment managers, regardless of the underlying performance of the funds.

Investment return experience and the performance of individual funds is reviewed with assistance from Quantum quarterly. Managers are reviewed against their agreed performance benchmarks and targets over both short-term and long-term time periods, to ensure they remain appropriate to implement the investment strategy for the Plan.

6.2. How does the Trustee monitor portfolio turnover and costs?

The Trustee has delegated the selection of holdings to the appointed investment managers. The Investment Consultant reviews the portfolio turnover and the associated costs of all funds on behalf of the Trustee at least on an annual basis.

The Trustee has not set a specific portfolio turnover target for each investment manager and recognises that portfolio turnover and costs may vary with market conditions. Each manager has ultimate responsibility for the underlying holdings within their funds and they are expected to change these underlying holdings to the extent required to achieve their investment objectives.

On behalf of the Trustee, the Investment Consultant may compare the annual turnover and associated costs for each fund with previous years to ensure each investment manager's process and philosophy remain consistent.

6 .3. How often is this SIP reviewed?

The Trustee will review this SIP every three years and following any significant change in investment policy. Any change to this SIP will only be made after a) having obtained and considered the written advice of someone who the Trustee reasonably believe to be qualified by their ability in, and practical experience of, financial matters, and who have the appropriate knowledge and experience of the management of pension Plan investments; and b) consulting the Sponsoring Employer.

R Bryant .... Richard Bryant ....

Signature | Name

For and on behalf of the RoSPA Retirement & Death Benefits Plan.

15.08.2024 ....

Date

Appendix 1 – Investment strategy

Asset Class	Manager	Fund	Asset Allocation %
Return Seeking Assets			**40.0**
Equity	LGIM	World Equity Index Fund	20.0
Diversified Growth	LGIM	Dynamic Diversified Fund	10.0
Multi-Asset Credit	M&G	Total Return Credit Investment Fund	10.0
Liability Matching Assets			**60.0**
Cashflow Driven Investments ("CDI")	Insight	Maturing Buy and Maintain Bond Fund range	25.0
LDI & Collateral	Insight	Enhanced Selection LDI range	35.0
	LGIM	Sterling Liquidity	

The Trustee does not automatically rebalance the assets in line with the central benchmark. This approach is designed to reduce unnecessary transaction costs being incurred. However, the Trustee will review the asset allocation of the Plan periodically and rebalance if necessary.

Collateral management

The Plan uses leveraged assets as part of its investment strategy. In order to ensure the level of leverage in these funds remains appropriate (and within the tolerance ranges), the LDI manager may "call" for additional collateral to be provided, or may return capital to the Plan. Collateral calls from de-leveraging events will be met using the below collateral order.

1. LGIM Sterling Liquidity Fund
2. M&G Total Return Credit Investment Fund
3. LGIM Dynamic Diversified Fund
4. LGIM World Equity Index Fund

For re-leveraging events, the capital distributed will be distributed into the LGIM Sterling Liquidity Fund.

Appendix 2 – Managers, fund objectives and characteristics

Manager	Fund	Asset class	Fund characteristics	Fund objectives	Custodian
LGIM	World Equity Index	Equity	Passive	To track the performance of the FTSE World Index.	HSBC and Citigroup
LGIM	Dynamic Diversified	Diversified Growth	Active	To target a return of 4.5% p.a. in excess of Cash (Bank of England Base Rate) over a full market cycle.	HSBC and Citigroup
M&G	Total Return	Multi-Asset Credit	Active	To target a return of SONIA + 3 – 5% p.a. over a full market cycle (gross of fees).	State Street Bank and Trust Company
Insight	Maturing Buy and Maintain Bond range	CDI	Active	To (across desired maturities) provide investors with credit risk exposure through investing principally in a globally diversified portfolio of non-government bonds and avoiding investment which, in the opinion of the Investment Manager, are likely to default or experience a significant deterioration in credit quality.	Northern Trust Fiduciary Service (Ireland) Ltd
Insight	Enhanced Selection LDI range	LDI	Passive	To deliver leveraged nominal and/or inflation linked returns, in an attempt to reduce pension plan interest rate/inflation rate risk.	Northern Trust Fiduciary Service (Ireland) Ltd
LGIM	Sterling Liquidity	Cash	Active	To provide a return in line with the SONIA 7-Day compounded rate.	HSBC and Citigroup