

# **BDO Pension Scheme – DB Section**

**Statement of Investment Principles**

May 2024

## CONTENTS

1.	Introduction	1
2.	The Decision-Making Process	1
3.	Investment Objectives	2
4.	Investment Strategy	3
5.	Cash flow and Rebalancing	3
6.	Expected Return	4
7.	Risks	4
8.	Investment Manager Structure	5
9.	Environmental, Social and Governance (ESG)	6
10.	Conflicts of Interest	7
11.	Duration of Investment Arrangements	7
12.	Incentivisation of Investment Managers	7
13.	Portfolio Turnover Costs	8
14.	Investment Monitoring	8
15.	Review of this Statement	9
Appendix A		
	Investment Strategy Implementation Summary	11

## 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.

A copy of this Statement will be made available to Scheme members on request to the Trustee or online.

## 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 meet regularly and ensure that adequate time is set aside to discuss investment issues. In determining their investment strategy, the Trustee 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.
- 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 is remunerated a fee for its advice and its appointment is reviewed from time to time by the Trustee.

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**

In determining their objectives and strategy, the Trustee has considered the strength of the Employer's willingness and ability to support the Scheme. They have determined that it is reasonable to take a long-term view in determining their investment objectives and strategy.

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.

In October 2023, the Trustee agreed to de-risk the Scheme's portfolio to protect the current funding level and adopt a 'buy out aware' investment strategy.

### **Investment Objectives**

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

1. To maintain the ongoing funding level of the Scheme (i.e. the ratio of the value of assets to the value of liabilities as determined by the Scheme's Actuary) at or above the current level, including an assumption for expenses.
2. To broadly match the buy-out cost of the Scheme's liabilities.
3. To maintain sufficient flexibility in the Scheme's investment structure to be able to deal efficiently with all foreseeable changes both within and outside the Scheme.

4. To earn a return which exceeds, or at least equals, the benchmark based on an asset allocation approved by the Trustee in consultation with the Employer.
5. All other things being equal, to achieve the investment returns implied by the other objectives at the lowest possible cost.

### **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 in October 2023 and the revised investment strategy was implemented in November 2023.

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

The Trustee have 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 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.

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.

## **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 of 0.7% per annum (net of expenses) above UK Gilt yields. This return is a 'best estimate' of future returns that has been arrived at given the Scheme's 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. 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.
- **Credit risk:** The risk that the issuer of a bond failing to pay coupons and/or return the principal at maturity.

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.

## 8. 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 Legal & General Investment Management ('LGIM') 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 M&G in March 2024 with respect to the M&G Long Dated Corporate Bond Fund and the M&G All Stocks Corporate Bond Fund. 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.

## **9. 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.

The 2023 voting policies of the Investment Managers can be found at the following websites:



**M&G:**

[voting-policy-2023.pdf \(mandg.com\)](https://www.mandg.com/voting-policy-2023.pdf)

**LGIM:**

<https://www.lgim.com/uk/en/capabilities/investment-stewardship/>

The Trustee's views on how ESG issues are taken account of in each asset class used is set out below:

Asset Class	Active/Passive Managed	ESG Views
<b>Investment Grade Corporate Bonds</b>	Active	The Trustee expects the investment manager to take financially material ESG factors into account, given the active management style of the fund and the ability of the manager to use its discretion to generate higher risk adjusted returns. The Trustee also expects its investment manager to engage with investee companies, where possible, although it appreciates that fixed income assets do not typically attract voting rights.
<b>Government Bonds</b>	Passive	The Trustee believes there is less scope for the consideration of ESG issues to improve risk-adjusted returns in this asset class because of the nature of the securities.

The Trustee will review the stewardship policies, as well as assessing the stewardship and engagement activity of the current Investment Managers on an ongoing basis.

## 10. 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.

## 11. Duration of Investment Arrangements

The Trustee is a long-term investor and has not set an explicit target to review the duration of their arrangement with the Investment Managers. However, the arrangements will be reviewed in conjunction with any review of the investment strategy.

## 12. 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.

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.

### **13. 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.

### **14. 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 M&G provide a monthly valuation for the M&G Long Dated Corporate Bond fund and the M&G All Stocks Corporate Bond fund.

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 paid on 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 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.

## **15. 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.

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For and on behalf of BDO Pension Trustee No2 Limited

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Date

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For and on behalf of the Employer

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Date

## Appendix A Investment Strategy Implementation Summary

### A.1 Target Asset Allocation

The Target Asset Allocation for the Scheme’s assets is as follows:

Asset Class	Target Asset Allocation
Investment Grade Corporate Bonds	40.0%
Growth Assets	<b>40.0%</b>
UK Government Bonds	58.0%
Cash	2.0%
Matching Assets	<b>60.0%</b>
<b>Total Assets</b>	<b>100.0%</b>

The balance between the UK government bonds, and investment grade corporate bond funds will vary over time. The target is indicative only and the underlying objective for these assets will be to maintain the target hedging levels (see A.5 for details), which protect against changes in long-term interest rates and inflation expectations.

### A.2 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 Legal & General Investment Management (‘LGIM’ fund investments). The Investment Managers are regulated under the Financial Conduct Authority. The Trustee entered into a contract with Mobius Life Limited in November 2019.

### A.3 Investment Manager (off-platform)

The Trustee entered into a contract with M&G in March 2024 with respect to the M&G Long Dated Corporate Bond fund and the M&G All Stocks Corporate Bond fund holding. The Investment Manager undertakes day-to-day investment management of the Scheme’s assets.

The Investment Manager is authorised and regulated by the Financial Conduct Authority (FCA) under the Financial Services and Markets Act 2000.

### A.4 Strategies and Funds

The Trustee use the following funds operated by the Investment Managers:

Asset Class	Funds
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<b>Investment Grade Corporate Bonds</b>	M&G All Stocks Corporate Bond Fund
	M&G Long Dated Corporate Bond Fund
	LGIM Active Corporate Bond Over 10 Year Fund
<b>Government Bonds</b>	LGIM Over 15 Year Gilts Index Fund
	LGIM Over 15 Year Index-Linked Gilts Index Fund
	LGIM All Stocks Gilts Index Fund
	LGIM 2071 Gilts Index Fund
<b>Cash</b>	LGIM Sterling Liquidity Fund

### A.5 Target Hedging Ratios

The target hedging ratios against the interest rate risk and inflation risk associated with the Scheme's funded Technical Provisions (or asset value where the Scheme is in surplus) are summarised below:

	Target Hedging Ratio
Long-term interest rates	100%
Long-term inflation expectations	100%

### A.6 Fund Performance Benchmarks and Objectives

The UK government bond funds are index-tracking funds, meaning that their objective is to track the total return on a specified market index, sometimes within an agreed margin over a specified timescale. The benchmark and tracking criterion for these funds as well as the Sterling Liquidity fund are given below:

Fund	Benchmark	Tracking Criterion
<b>LGIM Over 15 Year Gilts Index Fund</b>	FTSE Actuaries UK Conventional Gilts Over 15 Years Index	Track the performance of the benchmark to within $\pm 0.25\%$ p.a. for two years out of three.
<b>LGIM Over 15 Year Index-Linked Gilts Index Fund</b>	FTSE Actuaries UK Index-Linked Gilts Over 15 Years Index	Track the performance of the benchmark to within $\pm 0.25\%$ p.a. for two years out of three.
<b>LGIM All Stocks Gilts Index Fund</b>	FTSE Actuaries UK Conventional Gilts	Track the performance of the benchmark to within $\pm 0.25\%$ p.a. for two years out of three.
<b>LGIM 2071 Gilts Index Fund</b>	Treasury 1.625% 2071 Gilts	Track the performance of the benchmark to within $\pm 0.25\%$ p.a. for two years out of three.
<b>LGIM Sterling Liquidity Fund</b>	Sterling Overnight Index Average	Provide capital stability and a return in line with money market rates.

The remaining funds used by the Trustee are actively managed, with an objective to outperform a specified market benchmark, as summarised below:

Fund	Benchmark	Performance Target
<b>M&amp;G All Stocks Corporate Bond Fund</b>	Markit iBoxx Sterling Non-Gilts Index	To outperform the benchmark by 0.8% p.a. (gross of fees) on a three-year rolling basis.
<b>M&amp;G Long Dated Corporate Bond Fund</b>	Markit iBoxx Non-Gilts Over 15 Years Index	To outperform the benchmark by 0.8% p.a. (gross of fees) on a three-year rolling basis
<b>LGIM Active Corporate Bond Over 10 Year Fund</b>	Market iBoxx Non-Gilts Over 10 Years Index	To outperform the benchmark by 0.75% p.a. (gross of fees) on a three-year rolling basis

### A.7 Investment Management Charges

The annual management charges for each of the funds used, based on the assets under management at the date of this Statement, are given below:

Fund	Annual Management Charge	Total Expense Ratio	Total Expenses*
<b>M&amp;G All Stocks Corporate Bond Fund</b>	0.30% p.a.	0.32% p.a.	0.32% p.a.
<b>M&amp;G Long Dated Corporate Bond Fund</b>	0.30% p.a.	0.32% p.a.	0.32% p.a.
<b>LGIM Active Corporate Bond Over 10 Year Fund</b>	0.20% p.a.	0.20% p.a.	0.275% p.a.
<b>LGIM Over 15 Year Index-Linked Gilts Index Fund</b>	0.0375% p.a.	0.0375% p.a.	0.0875% p.a.
<b>LGIM Over 15 Year Gilts Index Fund</b>	0.0375% p.a.	0.0375% p.a.	0.0875% p.a.
<b>LGIM All Stocks Gilts Index Fund</b>	0.0375% p.a.	0.0375% p.a.	0.0875% p.a.
<b>LGIM 2071 Gilts Index Fund</b>	0.04% p.a.	0.04% p.a.	0.09% p.a.
<b>LGIM Sterling Liquidity Fund</b>	0.05% p.a.	0.06% p.a.	0.11% p.a.

\*Total Expenses is the total expense ratio (TER) of the fund in addition to the Mobius Life platform fee of 0.05% p.a. for regular funds and 0.075% p.a. for income-paying funds.

### A.8 Additional Voluntary Contributions (AVCs)

Members are not permitted to make AVCs to the Scheme. AVCs previously paid by members are invested with Phoenix Life Limited and ReAssure Limited.