

THE CHAIR'S STATEMENT REGARDING DC GOVERNANCE: 1 APRIL 2019 – 31 MARCH 2020

This statement is produced pursuant to Regulation 23 of the Occupational Pension Schemes (Scheme Administration) Regulations 1996, as amended by subsequent legislation. It explains how the Jupiter Pension Scheme ("the Scheme") is meeting the governance standards that apply to occupational pension schemes that provide money purchase benefits (i.e. Defined Contribution schemes – DC).

Default arrangement

Members of the Scheme who do not make an explicit choice regarding the investment of their funds will be invested in the default strategy arrangement chosen by the Trustee with the advice of their Investment Consultant.

During the period covered by this statement, the Scheme's default strategy was to invest solely in the Jupiter Balanced Fund, managed by Jupiter Asset Management Limited ("Jupiter"). This is an actively-managed multi-asset fund that invests in a range of asset classes including equities, bonds, property, commodities and cash. This strategy offers good growth potential to members and targets a flexible retirement outcome, with no lifestyling in place.

The only change to the Scheme's investment strategy that occurred during the period covered by this statement was the closure of the Jupiter Strategic Reserve Fund in May 2019, which was previously available as a self-select option. The fund's investment manager, Jupiter, had made a decision to close this fund and it was therefore removed from the options available to members of the Scheme. Members' assets were automatically transferred to the Jupiter Pension Scheme Pre-Retirement Fund. This Fund was chosen as the destination for these assets because it was the most similar fund to the Jupiter Strategic Reserve Fund at the time of the transfer; the Trustee received formal advice from its Investment Consultant before making this decision. Additionally, we believe the chosen destination fund qualifies as a "default arrangement" because at least one member of the Scheme had been invested in the Jupiter Strategic Reserve Fund for more than 5 years at the time of closure and did not specify where their assets should otherwise be invested. Further information is included in the Scheme's Statement of Investment Principles ("SIP"), which is appended to this statement. This closure also affected the underlying asset allocation of the Jupiter Pension Scheme Pre-Retirement Fund as the Jupiter Strategic Reserve Fund was one of its underlying components. It has now been replaced with the Northern Trust Sterling Fund, a cash fund.

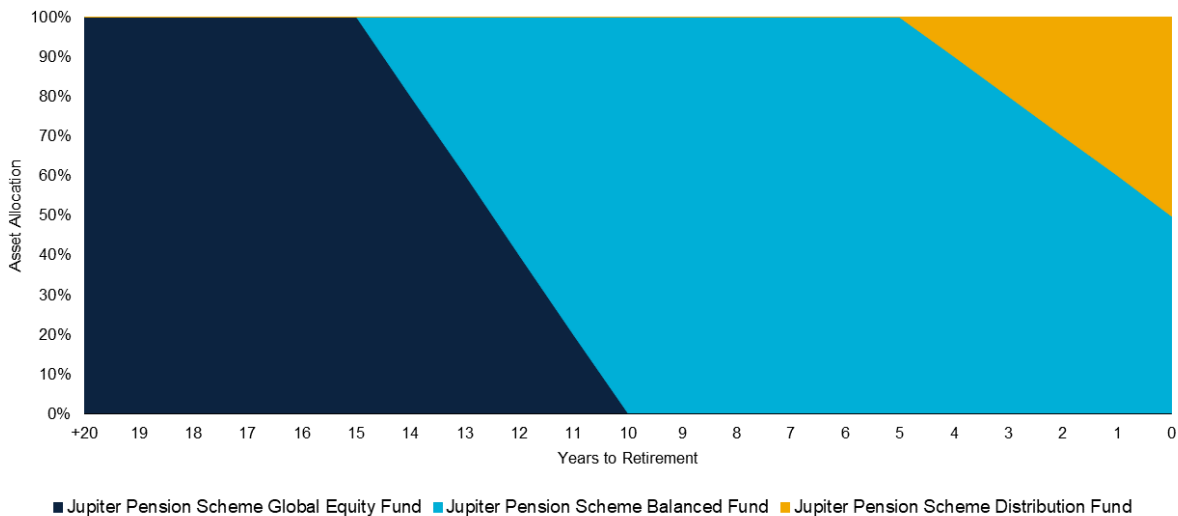
The Scheme's investment strategy has been reviewed during the period covered by this statement. A formal review was carried out by the Trustee's Investment Consultant, Mercer, between March and May 2019 and the outcome was discussed by the Trustee in the meeting of 17 June 2019. The changes from this review were implemented with effect from June 2020 (shortly after the period covered by this statement). In determining the investment strategy, the Trustee undertook extensive investigations and received formal written investment advice from its Investment Consultant. The Trustee has explicitly considered member demographics and the trade-off between risk and expected returns.

The main objective of the new default is to provide an investment strategy that is aligned to the needs of an average member that will optimise the return on investments while providing a broad level of protection against the key risks as identified in the Scheme's SIP. The new default strategy achieves this by introducing lifestyling, whereby savings are exposed to riskier, higher growth investments further from retirement, and lower-risk investments as retirement approaches. The new lifestyle has three distinct stages: Growth, Consolidation and Access:

- During the Growth phase (up to 15 years before retirement), assets are fully invested in the **Jupiter Pension Scheme Global Equity Fund**. This is a new fund that has been specifically set up for the Scheme that will provide exposure to a diversified array of equities from around the world by investing in underlying funds that are predominantly managed by Jupiter Asset Management. This new fund will therefore expose savings to a greater proportion of growth assets when compared to the current default fund.

- Savings and contributions will then switch at a constant rate into the **Jupiter Pension Scheme Balanced Fund** (the current default fund) so that a member is fully invested in this fund when they are between 10 and 5 years from retirement; this will offer a greater level of downside protection while still exposing a member's savings to a decent level of growth opportunity. This is known as the Consolidation phase.
- During the final 5 years before retirement, 50% of assets will gradually move into the **Jupiter Pension Scheme Distribution Fund**. This fund invests around 75% of savings into fixed interest securities issued by companies or governments based anywhere in the world and the remaining 25% into equities, most of which are UK-based. The fund is therefore a lower risk investment compared to the Jupiter Pension Scheme Balanced Fund and will be used to help reduce large fluctuations in the value of a member's savings pot in the run up to retirement.

This strategy can be illustrated using the following chart:



Following the investment strategy review, the Trustee also agreed to add the following four funds to the list of available self-select options, bringing the total funds available to eight:

- **Jupiter Pension Scheme Global Equity Fund**, the fund used during the Growth stage of the new default lifestyle;
- **Jupiter Pension Scheme Global Sustainable Equity Fund**, a global equity fund with a focus on sustainable investment practices, which is also an underlying fund within the Jupiter Pension Scheme Global Equity Fund;
- **Jupiter Pension Scheme Threadneedle TPEN Property Fund**, a UK commercial property fund which will give members the chance to diversify their savings away from traditional equity and bond investments (*at the time of writing, this fund has not yet been implemented as a self-select option. The Trustee hopes to make the fund available shortly*);
- **Jupiter Pension Scheme Northern Trust Sterling Fund**, a cash fund to offer a lower risk option to members.

The default arrangement is described in further detail in the Scheme's SIP which was last reviewed by the Trustee on 16 September 2020 and a copy of which is appended to this statement. The strategy will be reviewed as a minimum every three years (i.e. by June 2022). The SIP will also be reviewed as a minimum every three years or as soon as any significant developments in investment policy or member demographics take place.

The Trustee continually monitors the performance of the Scheme's investments throughout the year and receives quarterly performance reports from the investment managers which are reviewed at quarterly Trustee meetings. In particular, both absolute and relative performance are reviewed, and the Head of Portfolio

Analytics for Jupiter Asset Management provides the Trustee with additional commentary on Jupiter's funds, which typically includes details of the contribution of each of the underlying holdings as well as information about any significant exposures. The Trustee also has face to face interviews with the fund managers from time-to-time, the most recent of which occurred in September 2018. The Scheme's Investment Consultant is present at every quarterly Trustee meeting and will challenge the investment managers on performance issues, if these arise. We are happy with the performance over the period covered by this statement and we have no major concerns regarding the performance of any of the funds used in the Scheme.

The Trustee has set up processes to publish this Statement, the Scheme's SIP and any other information as required online at the following URL: www.jupiteram.com/corporate/Governance/Jupiter-Pension-Scheme and will notify members about this in their annual benefit statements.

Processing Scheme transactions

The Trustee has a specific duty to ensure that the Scheme's core financial transactions are processed promptly and accurately. These include the investment of contributions, transfer of member assets into and out of the Scheme, transfers between different investments within the Scheme and payments to and in respect of members.

These transactions are undertaken on the Trustee's behalf by the Scheme administrator, Mercer, and its investment manager Jupiter Asset Management Limited. The Trustee periodically reviews the processes and controls implemented by those organisations, and considers them to be suitably designed to achieve these objectives. The Trustee has a service level agreement (SLA) in place with the Scheme administrator which covers the accuracy and timeliness of all core transactions and receives regular reports to monitor the performance against those service levels. The processes adopted by the Scheme administrator to help meet the SLA include dynamics checklists, a central financial control team separate to the admin team, daily monitoring of bank accounts, a dedicated contribution processing team and three level checking of investment and banking transactions. During the period covered by this statement, 58% of work was completed within the agreed service levels. There were some delays in the processing of Scheme transactions due to a high turnover of the Scheme administrator's staff. The administrator also underwent a "DC centralisation" project, whereby all DC schemes were moved to be managed by one specialist DC team; this project put pressure on the administrator teams in the short run, but the administrator is confident that this project will improve service levels in the long run. There were no material issues relating to the processing of Scheme transactions over the Scheme year and no members were financially impacted as a result of missed SLAs.

The Trustee is aware of the drop in administration performance over the year covered by this statement and therefore met with representatives from the administration team in January 2020 to discuss the issues. Mercer proposed a set of actions to be taken to improve performance, including drafting in extra resources, tightening controls and providing the Trustee with monthly SLA statistics. The Trustee will be closely reviewing the performance of the administrators over 2020 and will take further action if required. The Trustee also receives an annual Assurance Report on Internal Controls (AAF 01/06) from Mercer.

In light of the above, given the drop in SLAs, while leading to some delays, did not lead to notable adverse effects for members, the Trustee considers that the requirements for processing core financial transactions specified in the Administration Regulations (The Occupational Pension Schemes (Scheme Administration) Regulations 1996) have been met and were processed accurately during the scheme year.

Charges and transaction costs – default arrangement and additional funds

The law requires the Trustee to disclose the charges and transactions costs borne by DC scheme members and to assess the extent to which those charges and costs represent good value for money for members. These transaction costs are not limited to the ongoing charges on member funds, but should also include trading costs incurred within such funds. We have taken account of all relevant statutory guidance when preparing this section of the report.

Annual charges for each fund are presented as the Ongoing Charges Figure ("OCF"). This includes investment management charges and additional expenses and allows for the rebate of Jupiter Asset Management fees to

members. In addition to the OCF, investment funds are subject to other implicit costs, such as the transaction costs associated with trading a fund's underlying securities, as well as commissions and stamp duty.

Transaction costs have been provided by the Scheme's investment manager and they are calculated using slippage methodology. That is, the transaction costs represent the difference between the expected trading price of a security within a fund and the price at which the trade is actually executed at (as typically a trade is executed a few working days after an order is placed). Therefore, in a buy order, for example, if the execution price is less than the expected price, a transaction cost may be negative.

Details of the Ongoing Charges Figure (OCFs) payable for each fund as well as the transaction costs during the year under review within the former default arrangement are as follows:

Fund	OCF (%)	Transaction Cost (%)
Jupiter Balanced Fund	0.66	0.01

Source: Jupiter Asset Management Limited. Charges shown here are those that apply directly to members' investments, after accounting for the rebate of Jupiter fees.

This is lower than the maximum OCF allowed of 0.75% for default arrangements.

The Trustee also makes available a range of funds which may be chosen by members as an alternative to the default arrangement. These funds allow members to take a more tailored approach to managing their own pension investments and attract annual charges and transaction costs as follows:

Fund	OCF (%)	Transaction Cost (%)
Jupiter Balanced Fund	0.66	0.01
Jupiter Merlin Growth Fund	0.90	0.00
Jupiter Pre-Retirement Fund	0.16	0.10
Jupiter Distribution Fund	0.25	0.00

Source: Jupiter Asset Management Limited. Charges shown here are those that apply directly to members' investments, after accounting for the rebate of Jupiter fees.

The Trustee is comfortable that the costs for the default arrangement and self-select funds were reasonable both in terms of the outcomes the funds are targeting and the fees in the wider market applicable to similar investment strategies and schemes. Further details are provided in the "Value for Members" section below.

Cumulative effect of charges

Using the charges and transaction cost data provided by the relevant parties and in accordance with regulation 23(1)(ca) of the Administration Regulations, as inserted by the 2018 Regulations, the Trustee has prepared illustrations detailing the impact of the costs and charges typically paid by a member of the Scheme on their retirement savings pot. The statutory guidance has been considered when providing these examples.

In order to represent the range of funds available to members we are required to show the effect on a member's savings of investment in a selection of significant funds within the Scheme. The funds we are required to illustrate are (with the specific Scheme fund in brackets):

- The fund or strategy with the most members invested (*Jupiter Balanced Fund*)
- The most expensive fund (*Jupiter Merlin Growth Fund*)
- The cheapest fund (*Jupiter Pre-Retirement Fund*)
- The fund with the highest expected return (*Jupiter Merlin Growth Fund*)
- The fund with the lowest expected return (*Jupiter Pre-Retirement Fund*)

To illustrate the impact of charges on a typical active member's pension pot, we have provided examples below. The illustrations account for all estimated member costs, including the TER, transaction costs and inflation.

Illustrations for an “Average” member						
	Jupiter Balanced Fund (the default strategy as at 31 March 2020) <i>(the most popular option)</i>		Jupiter Merlin Growth Fund <i>(most expensive and highest expected return fund)</i>		Jupiter Pre-Retirement Fund (additional default arrangement) <i>(cheapest and lowest expected return fund)</i>	
Years from now	Before Charges	After Charges and costs deducted	Before Charges	After Charges and costs deducted	Before Charges	After Charges and costs deducted
1	£42,081	£41,790	£42,563	£42,178	£41,037	£40,943
3	£66,783	£65,633	£68,787	£67,238	£62,597	£62,242
5	£92,803	£90,403	£97,153	£93,858	£84,014	£83,303
10	£164,093	£156,616	£178,627	£167,879	£136,941	£134,934
15	£245,282	£229,444	£277,778	£253,958	£188,998	£185,137
20	£337,743	£309,549	£398,439	£354,056	£240,200	£233,952
25	£443,042	£397,658	£545,280	£470,459	£290,560	£281,416
26 (retirement)	£465,795	£416,309	£578,269	£495,923	£300,533	£290,750
Illustrations for a “Young” member						
	Jupiter Balanced Fund (the default strategy) <i>(the most popular option)</i>		Jupiter Merlin Growth Fund <i>(most expensive and highest expected return fund)</i>		Jupiter Pre-Retirement Fund <i>(cheapest and lowest expected return fund)</i>	
Years from now	Before Charges	After Charges and costs deducted	Before Charges	After Charges and costs deducted	Before Charges	After Charges and costs deducted
1	£10,246	£10,175	£10,342	£10,249	£10,039	£10,016
3	£22,329	£21,985	£22,872	£22,412	£21,187	£21,080
5	£35,056	£34,254	£36,425	£35,331	£32,261	£32,021
10	£69,926	£67,050	£75,353	£71,258	£59,629	£58,841
15	£109,637	£103,123	£122,727	£113,036	£86,546	£84,920
20	£154,862	£142,800	£180,379	£161,619	£113,022	£110,278
25	£206,367	£186,441	£250,538	£218,115	£139,062	£134,934
30	£265,022	£234,442	£335,920	£283,813	£164,675	£158,908
35	£331,822	£287,240	£439,825	£360,212	£189,867	£182,220
40	£407,896	£345,312	£566,274	£449,055	£214,645	£204,886

41 (retirement)	£424,334	£357,605	£594,682	£468,490	£219,552	£209,344
Assumptions						
<p>The above illustrations have been produced for an “average” member and a “young” member of the Scheme based on the Scheme’s membership data. The “Default Strategy” illustration assumes the member’s asset allocation remains fully invested in the current default strategy. The individual fund illustrations assume 100% of the member’s assets are invested in that fund up to the Scheme retirement age. The results are presented in real terms, i.e. in today’s money, to help members have a better understanding of what their pension pot could buy in today’s terms, should they invest in the funds above as shown.</p> <p>You will note that the total fee figure is lower than the difference between the pot size before and after fees. The total fee reflects what has actually been taken from the pot to pay for the management of assets and other expenses, whereas the difference between before and after fee pot values reflects the effect of compounding.</p> <p>The values shown are estimates and are not guaranteed.</p>						
Age						
<ul style="list-style-type: none"> • “Average” member • “Young” member 	<p>39 (<i>the average age of the Scheme’s membership</i>)</p> <p>24 (<i>the average age of the youngest 10% of members</i>)</p>					
Scheme Retirement Age	65					
Starting Pot Size						
<ul style="list-style-type: none"> • “Average” member • “Young” member 	<p>£30,204 (<i>the median pot size of the Scheme’s membership</i>)</p> <p>£4,437 (<i>the median pot size for the youngest 10% of members</i>)</p>					
Starting Salary						
<ul style="list-style-type: none"> • “Average” member • “Young” member 	<p>£73,000 (<i>the median salary of the Scheme’s membership</i>)</p> <p>£37,500 (<i>the median salary for the youngest 10% of members</i>)</p>					
Inflation	2.5% p.a.					
Rate of Salary Growth	2.5% p.a.					
Employer annual contributions	15% p.a.					
Employee annual contributions	0% p.a.					
Expected future nominal returns on investment:						
<ul style="list-style-type: none"> • Jupiter Balanced Fund • Jupiter Merlin Growth Fund • Jupiter Pre-Retirement Fund 	<p>2.6% above inflation</p> <p>4.0% above inflation</p> <p>0.4% below inflation</p>					

Value for members

The law requires the Trustee to assess the extent to which the charges and transaction costs set out above represent good value for Scheme members.

The Trustee understands that value for members does not necessarily mean selecting the cheapest option. In the annual review of value for members we consider many factors including quality of customer service, member communications and support, the efficiency of administration services, the robustness of Scheme governance, fund management and performance of the funds.

All of the funds used by the Scheme have been through an “Indication Review” (conducted by Mercer’s Manager Research Team) and each received an Amber rating implying that each fund has “average” prospects of resulting in an investable rating following further research. Investment performance is reviewed and discussed at least quarterly. The same applies with the efficiency of administration services, which are also discussed quarterly. With this in mind, the Trustee has assessed the costs and charges disclosed in this statements and is satisfied that the stated explicit charges for the Scheme’s funds represent good value for money in the context of the outcomes targeted by such funds and the current market rates for similar investments levied on members of schemes with a similar membership profile.

The Trustee carries out an annual formal value for members assessment. For the 12-month period covered by this statement, the value for members assessment is dated 16 September 2020. The assessment considered three key areas: Price, Performance and Productivity, covering factors such as investment fees, investment performance and non-investment items such as administration, governance and communications with members. The assessment concluded that overall the Scheme was offering good value to members across all three of the areas considered. The assessment also highlighted areas where the Scheme could improve, such as by providing better online access for members and improving administration services; the Trustee acknowledges that the service provided by the administration team is not currently offering good value for members. The administrators are working to improve the levels of service provided and the Trustee is monitoring the situation closely.

Value for members is boosted by the use of Jupiter’s own in-house funds as members receive a rebate for any investment management fees incurred by Jupiter Asset Management; these rebates are accounted for in the calculation of the Ongoing Charges Figures provided earlier in this statement. Members of the Scheme also benefit from a very competitive contribution structure, where the Employer contributes 15% and members are not required to contribute but may also opt to make additional voluntary contributions.

Trustee’s knowledge and understanding

Sections 247 and 248 of the Pensions Act 2004 set out the requirement for trustees to have appropriate knowledge and understanding of the law relating to pensions and trusts, the funding of occupational pension schemes, investment of Scheme assets and other matters to enable them to exercise their functions as trustees properly. This requirement is underpinned by guidance in the Pension Regulator’s Codes of Practice 07 and 13. The comments in this section relate to the Trustee as a body in dealing with the whole Scheme.

The Trustee has put in place arrangements for ensuring that we take personal responsibility for keeping ourselves up-to-date with relevant developments. The sole Trustee of the Scheme, BESTrustees Limited, is a company which provides trusteeship services to a wide range of clients. Providing this service is educational in itself since it allows the company’s representatives to compare and contrast experience gained across a wide range of schemes. However, there are more formal aspects to the way in which representatives of BESTrustees pursue a programme of continuing professional development. Each of the firm’s representatives is a member of the Association of Professional Pension Trustees which sets minimum standards for annual training. BESTrustees organises a number of bespoke training courses for its own employees and encourages them to take full advantage of relevant courses provided by specialists in various fields, including training that is relevant to defined contribution arrangements. Over the period covered by this statement, the Trustee attended various training sessions including sessions on member options, investment strategies, new professional trustee standards and responsible investment practices.

In addition, the Trustee receives advice from professional advisers, and the relevant skills and experience of those advisers is a key criterion when evaluating adviser performance or selecting new advisers. The Trustee also includes legislative updates and Trustee Knowledge and Understanding on the agenda for each of our meetings, which are held on a quarterly basis.

The Trustee has familiarised themselves with the Scheme’s SIP and has demonstrated a working knowledge of the SIP when updating the SIP in Q3 2020 (signed on 16 September 2020 for the new requirements in relation to investment manager arrangements as well as updating for the Scheme’s new investment strategy. Other key documents are referenced and discussed at Trustee meetings as appropriate; for example, conflicts

of interest, breach log, governance calendar and 3 year plan, bank account movements and risk register are all included as standing items on meeting agendas and therefore these issues are discussed at least once a quarter. Two representatives from BESTrustees Limited attend each quarterly meeting.

The representatives from BESTrustees Limited have completed the Pension Regulator's Trustee Toolkit and have also familiarised themselves with the Scheme's trust deed and rules. Knowledge of the trust deed and rules has been demonstrated by the Trustee through activities such as reviewing the Scheme Booklet, reviewing the Scheme's investment strategy and dealing with individual member queries (such as death cases and annual allowance queries) as and when they arose through the year. In July 2020 both representatives of BESTrustees Limited received formal accreditation as Professional Pension Trustees through the Association of Professional Pension Trustees.

In addition, throughout the year, the Trustee carried out discussions on new GDPR requirements and sought legal advice on several occasions, including on the process of passing charges on to members. BESTTrustees Limited therefore believe their representatives have demonstrated that they have sufficient knowledge and understanding of the law relating to pensions and trusts and they will continue to seek legal advice as and when appropriate.

Taking account of actions taken as a Trustee body, and the professional advice available, the Trustee considers that it is enabled properly to exercise its functions as Trustee of the Scheme.

In addition, while most schemes simply focus on trustee training and use of advisers, we believe that knowledge and understanding should also be extended to awareness of member demographics and member behaviour, otherwise trustees cannot be certain that a scheme remains fit for purpose. To ensure this we review the Scheme's demographics profile and carry out member surveys from time to time.

Given the extent of the training above, the Trustee is comfortable that we have demonstrated sufficient knowledge of the law relating to pension schemes and trusts and the principles relating to the funding and investment of pension schemes. I am also satisfied that the Trustee has demonstrated a working knowledge of the Scheme's trust deed and rules, Statement of Investment Principles and all other documents setting out the Trustee's current policies.

The Chair's statement regarding DC governance was approved by the Trustee and signed on their behalf by:

Rachel Brougham

Chair of the Trustee

Date: 29 September 2020

Jupiter Pension Scheme

Statement of Investment Principles – 2020 Edition

September 2020

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1 Introduction

This Statement of Investment Principles (“the Statement”) has been prepared by the Trustee of the Jupiter Pension Scheme (“the Scheme”) in accordance with Section 35 of the Pensions Act 1995, as amended, and its attendant Regulations.

The Statement outlines the principles governing the investment policy of the Scheme and the activities undertaken by the Trustee to ensure the effective implementation of these principles.

In preparing the Statement, the Trustee has:

- Obtained and considered written advice from a suitably qualified individual, employed by its investment consultants, Mercer, whom it believes to have a degree of knowledge and experience that is appropriate for the management of the Scheme’s investments; and
- Consulted with the Principal Employer, although the Trustee affirms that no aspect of this strategy is restricted by any requirement to obtain the consent of Jupiter Asset Management Limited, as Principal Employer.

The advice and the consultation process considered the suitability of the Trustee’s investment policy for the Scheme.

The Trustee will review the Statement formally at least every three years to ensure its ongoing suitability. Furthermore, the Trustee will review the Statement following any significant change in investment policy. Any changes made to the Statement will be based on written advice from a suitably qualified individual and will follow consultation with the Principal Employer.

2 Investment responsibilities

2.1 Trustee's duties and responsibilities

The Trustee is responsible for setting the investment objectives and determining the strategy to achieve the objectives.

The Trustee carries out its duties and fulfils its responsibilities as a single body. The duties and responsibilities of the Trustee include, but are not limited to, the following tasks and activities:

- Setting of investment objectives and formulating investment strategy
- Selecting funds for member choices
- The regular approval of the content of the Statement
- The appointment and review of the investment managers and investment advisers
- The compliance of the investment arrangements with the principles set out in the Statement

2.2 Investment adviser's duties and responsibilities

The Trustee has appointed Mercer as the independent investment adviser to the Scheme. Mercer provides investment advice as required by the Trustee, as well as raising any investment-related issues, of which it believes the Trustee should be aware. Matters on which Mercer expects to provide advice to the Trustee include the following:

- Setting of investment objectives
- Determining investment strategy and structure of the default strategy
- Advising on appropriate member fund choices
- Framing manager mandates
- Selecting and replacing investment managers

The Trustee obtains advice as and when they require it.

In considering appropriate investments for the Scheme, the Trustee will obtain and consider written advice from Mercer, whom the Trustee believes to be suitability qualified to provide such advice. The advice received and arrangements implemented are, in the Trustee's opinion, consistent with the requirements of Section 36 of the Pensions Act 1995, as amended.

Mercer monitors the performance of the Scheme's investment managers against their benchmarks. Section 2.3 describes the responsibilities of the investment managers.

Mercer will also advise the Trustee of any significant developments of which it is aware relating to the investment managers, or funds managed by the investment managers in which the Scheme is invested, such that in its view there exists a significant concern that any of these funds will not be able to meet their long-term objectives. If the investment manager and fund are not covered by Mercer's manager research process, Mercer will advise the Trustee accordingly.

Both Mercer and the individual investment consultants who advise the Trustee are authorised and regulated by the Financial Conduct Authority (FCA).

2.3 Investment managers' duties and responsibilities

The Trustee, after considering appropriate investment advice, has selected Jupiter Asset Management Limited, Colombia Threadneedle Investments and Northern Trust Global Funds plc as investment managers to the Scheme.

At the time of writing, the Colombia Threadneedle Investments fund has not yet been implemented as a self-select option. The Trustee hopes to make the fund available shortly.

Details of the pooled funds offered by the investment managers and the basis of the contract between them and the Trustee are set out in Appendix 1.

The Trustee considered a range of active and passive approaches to investment management and assessed these against their investment objectives. The Trustee selected their investment managers having regard to their ability to provide one or more of the identified fund types and their potential to meet the investment objectives of the Scheme. Before selecting any investment manager, the Trustee ensures that appropriate due diligence is carried out.

The investment managers are responsible for all decisions concerning the selection and de-selection of the individual stocks within the portfolios they manage.

All of the investment managers engaged by the Trustee are authorised and regulated by the FCA.

2.4 Summary of responsibilities

A summary of the responsibilities of all relevant parties, insofar as they relate to the Scheme's investments, is set out in Appendix 2.

3 Investment objectives

3.1 Overall investment objectives

The Trustee's main objective is to provide members with an investment strategy aligned to the needs of their members that will optimise the return on investments in order to build up a savings pot which will be used in retirement.

The Trustee is mindful of their responsibility to provide members with an appropriate range of investment funds and a suitable default strategy. They recognise that in a defined contribution arrangement, members assume the investment risks themselves and that members are exposed to different types of risk at different stages of their working lifetimes.

Details of the approach the Trustee has taken to meet these investment objectives are set out in this Section and also in Section 4.

The Trustee has determined their investment policy in such a way as to address the risks set out in Section 6 of this Statement. To help mitigate the most significant of the risks, the Trustee has:

- Selected a lifestyle strategy to act as the Scheme's default investment option for those members who do not wish to select their own investments (Section 4), and
- Offered a range of self-select funds across various asset classes.

When deciding on the investment options available to members, the Trustee took into account the expected return on such investments and was mindful to offer a range of funds with varying levels of expected returns for members to choose from.

When it comes to realisation of investments, the Trustee considers the impact of transaction costs before making any changes.

The Trustee will review the investment approach from time to time, and make changes as and when it is considered to be appropriate.

The items set out in Section 3, 4 and 6 of this Statement are in relation to what the Trustee deems as 'financially material considerations' both for the default lifestyle strategy and the self-select options. The Trustee believes the appropriate time horizon for which to assess these considerations should be viewed at the overall membership level.

3.2 Fund choices

If members do not want to be invested in the default lifestyle strategy they have the option to invest in self-select funds. The range of investment options covers a number of asset classes with different risk and return objectives and provides appropriate strategic choices for members' different savings objectives, risk profiles and time horizons.

When self-selecting, the balance between funds and asset classes is the member's decision. This balance will determine the expected return on a member's assets and should be related to the member's own risk appetite and tolerance.

The Trustee has made the following 8 funds available for self-selecting;

- Jupiter Pension Scheme Global Equity Fund
- Jupiter Pension Scheme Balanced Fund

- Jupiter Pension Scheme Merlin Growth Fund
- Jupiter Pension Scheme Pre-Retirement Fund
- Jupiter Pension Scheme Distribution Fund
- Jupiter Pension Scheme Global Sustainable Equity Fund
- Jupiter Pension Scheme Threadneedle TPEN Property Fund (*at the time of writing, this fund has not yet been implemented as a self-select option. The Trustee hopes to make the fund available shortly*)
- Jupiter Pension Scheme Northern Trust Sterling Fund

Further details on these funds can be found in Appendix 1.

The Trustee will continue to keep the fund range under review, and will make changes if appropriate.

3.3 Types of investments to be held

The Trustee is permitted to invest across a wide range of asset classes, all of which are actively managed for both the default arrangement and self-select funds. The Trustee takes into account the ethos of the sponsoring employer as an organisation, and believes many members will share their employer's views regarding an active approach to investment management. Considering also that Jupiter's investment management fees are rebated to members, the Trustee believes it is appropriate to utilise actively managed funds in the context of the Scheme. All of the funds in which the Scheme invests are pooled and unitised. Details of each fund can be found in Appendix 1.

3.4 Additional Voluntary Contributions

The Scheme provides a facility for members to pay additional voluntary contributions to enhance their benefits at retirement. Members are offered the opportunity to invest additional contributions in the same way as the main DC scheme investments.

4 Default investment strategy

4.1 Aims and objectives

The default lifestyle strategy applies if a member does not wish to make their own investment selection. The default is designed to be appropriate for a typical member of the Scheme.

The Trustee has assumed responsibility for setting the default investment strategy that provides a broad level of protection against the key risks identified in Section 6. This is achieved using a lifestyle strategy, whereby assets are moved into less risky investments as members approach their target retirement age.

Members can opt out of the default lifestyle strategy, and invest in any fund made available in the self-select fund range as described in Sections 3.2.

4.2 Default strategy

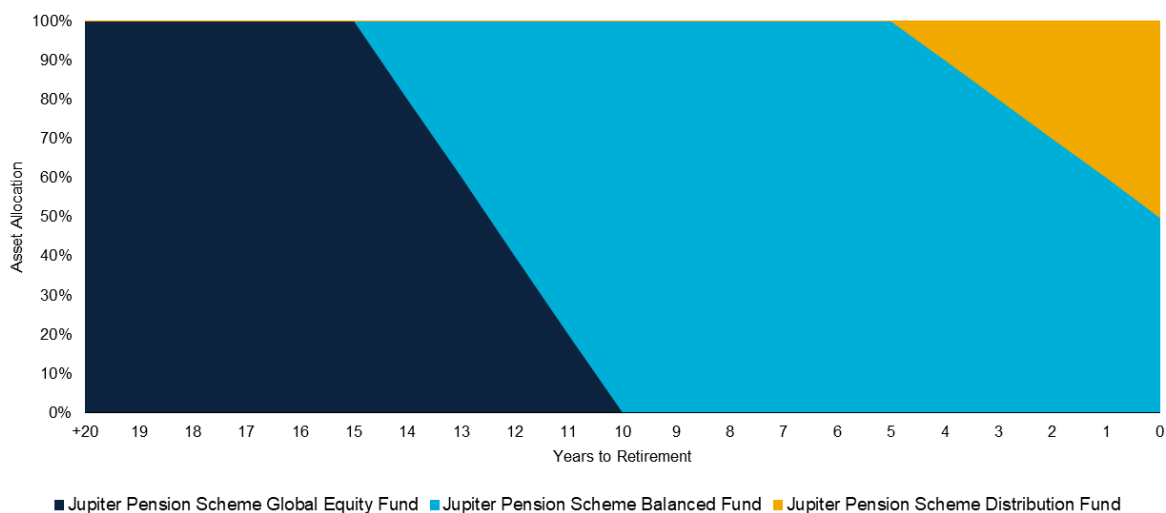
In determining the investment strategy, the Trustee undertook extensive investigations and has received formal written investment advice from its investment consultants. The Trustee has explicitly considered the trade-off between risk and expected returns. The expected amount of risk is considered appropriate for the typical member and will differ by member depending on their age as well as their expected retirement date. Further information is set out below.

Under the default lifestyle strategy, for a member joining the Scheme between 15 and 40 years from their target retirement age (“TRA”), a member’s savings and contributions are initially fully invested in the **Jupiter Pension Scheme (JPS) Global Equity Fund**. This actively-managed fund invests predominantly in global equities with the aim of achieving long term capital growth.

When members are 15 years from their TRA, savings and contributions will begin to move into the **JPS Balanced Fund** so that a member is fully invested in this fund when they are 10 years from their TRA. This is an actively-managed multi-asset fund that invests in a range of asset classes including equities, bonds, property, commodities and cash. This fund offers good growth potential to members but is expected to exhibit a lower level of volatility compared with the JPS Global Equity Fund.

Members will remain fully invested in the JPS Balanced Fund until 5 years prior to their TRA, at which point, savings and contributions will gradually move into the **JPS Distribution Fund**. This fund invests around 75% into fixed interest securities issued by companies or governments based anywhere in the world and the remaining 25% into equities, most of which are UK-based. The fund is therefore a lower risk investment compared to the JPS Balanced Fund and will be used to help reduce fluctuations in the value of a member’s savings pot in the run up to a member’s TRA.

Upon reaching their TRA, a member will have 50% of their savings invested in the JPS Balanced Fund and 50% in the JPS Distribution Fund. The default lifestyle strategy can be illustrated using the following graph:



By investing in this manner, the Trustee expects to deliver real growth over a member’s time within the Scheme without excessive risk taking, with an increased focus in the final 15 years of reducing volatility to protect members’ pots as retirement approaches. This strategy is targeting a flexible retirement outcome and the Trustee considers this approach to be in the best interests of the Scheme’s members.

The objectives set out above and the risks and other factors referenced in this Statement are those that the Trustee considers to be financially material considerations in relation to the default investment strategy. The Trustee believes that the appropriate time horizon within which to assess these considerations should be viewed at the membership level. This will be dependent on the members’ age and when they expect to retire.

Taking into account the demographics of the membership and the Trustee’s views of how the membership will behave at retirement, the Trustee believes that the current default is appropriate. The performance of the default strategy is monitored at least every three months and the Trustee will continue to review the strategy over time, at least triennially, or after any significant changes to the Scheme’s demographic, if sooner.

4.3 Additional default arrangement

In accordance with Section 4 – Restrictions on Charges of the Occupational Pension Schemes (Charges and Governance) Regulations 2015 No. 879, the Scheme has identified a further fund, the **JPS Pre-Retirement Fund**, as a “default arrangement” (as defined by these regulations).

This fund has been identified as a “default arrangement” as members’ assets have been automatically directed to this fund without members having instructed the Trustee where their assets are to be invested. This occurred following the decision of the Trustee to remove the Jupiter Strategic Reserve Fund as a self-select option to members and transfer assets into the JPS Pre-Retirement Fund. The JPS Pre-Retirement Fund was chosen as the destination for these assets because it was the most similar fund to the Jupiter Strategic Reserve Fund that was used in the Scheme at the time of the transfer; the Trustee received formal advice from its investment consultants before making this decision. We believe the fund qualifies as a “default arrangement” because at least one member of the Scheme had been invested in the Jupiter Strategic Reserve Fund for more than 5 years at the time of closure and did not specify where their assets should otherwise be invested.

The JPS Pre-Retirement Fund invests in UK government bonds (Conventional and Index-Linked), corporate bonds and cash at a ratio of 37.5% to 37.5% to 25% respectively. The fund is designed to provide low volatility and to track the prices of annuities as members approach retirement, thereby reducing pension conversion risk for members who intend to opt for annuity-purchase at retirement.

As with the main default arrangement, the performance of this fund is monitored at least every three months, with a strategic review being carried out at least triennially since falling under the categorisation of a ‘default arrangement’. The Trustee has explicitly considered the trade-off between risk and expected returns. Risk is

not considered in isolation, but in conjunction with expected investment returns and outcomes for members. Assets are invested in the best interests of members (taking into account the objectives of the arrangement) and members can opt to move their savings out of this arrangement at any time. Assets are invested in a manner which aims to ensure the security, quality, liquidity and profitability of a member's portfolio as a whole. Assets are invested in pooled funds which are daily dealing and readily realisable.

4.4 Members' best interests

The Trustee will carry out in-depth investment review triennially or following any significant change in membership, covering not only the performance of the default strategy, but also its design to ensure that it continues to remain appropriate for the membership profile. This is in addition to more regular performance monitoring, which takes place quarterly. The Trustee strives to ensure the strategy evolves in line with the Scheme's membership characteristics in order to ensure that assets are invested in the best interests of the members in the default investment strategy.

5 Responsible investing

5.1 Financially material considerations

The Trustee recognises that Environmental, Social and Governance (ESG) factors, including climate change, can all influence the investment performance of the Scheme's portfolio and it is therefore in members' and the Scheme's best interests that these factors are taken into account within the investment process and that ESG risks are identified and avoided or mitigated as best as possible.

The Trustee believes that investing with a manager who approaches investments in a responsible way and takes account of ESG-related risks will lead to better risk-adjusted performance as omitting these risks in investment analysis could skew the results and underestimate the level of overall risk being taken.

The Trustee is aware of the investment managers' approaches to environmental, social and governance factors with respect to the selection of investments. The funds that the Scheme's assets are invested in are actively managed and ESG factors are integrated into the investment decision-making process. All of the investment managers are also signatories to the UN's Principles of Responsible Investment (PRI) and the UK Stewardship Code and operates with in-house sustainability and stewardship committees.

The Trustee is satisfied that a responsible approach is being taken which is consistent with the long-term financial interests of the Scheme and its members. The Trustee will continue to review the available products and approaches in this space and will strive for the Scheme to deliver strong risk-adjusted returns, incorporating responsible investment principles into the process wherever possible. The Trustee includes a standing item on the agenda for Trustee meetings to annually review the Scheme's policies and progress concerning ESG factors.

5.2 Non-financial considerations

The Trustee does not take into account non-financial matters in the selection, retention and realisation of investments.

5.3 Stewardship and voting policy

As the Scheme's assets are invested in pooled funds, the Trustee accepts that they are unable to directly influence the environmental, social and governance policies and practices of individual companies in which their assets are invested in. This responsibility is therefore left to the investment managers, who will exercise these rights in accordance with their respective published corporate governance policies and current best practice, including the UK Corporate Governance Code and UK Stewardship Code. These policies, which are provided to the Trustee from time to time, take into account the financial interests of shareholders, and should be for the members' benefit. The Trustee will review the investment managers' policies and engagement activities (where applicable) on an annual basis.

The investment managers will appropriately exercise their stewardship responsibilities on behalf of the Trustee in order to meet the investment objectives of the funds. Stewardship entails the analysis of and engagement with investee companies on material factors relating to their governance and the long-term sustainability of their business models. As a signatory to the UK Stewardship Code published by the Financial Reporting Council, the investment managers are committed to the responsible ownership of investee companies.

The Trustee will strive to review annual reports on the voting undertaken by the investment managers during the period to get reassurance that it remains broadly consistent with the Trustee's view of good stewardship

standards. However, the Trustee is conscious that the investment managers may not be able to provide voting records for all investments held within a fund-of-funds structure.

Where the Trustee is specifically invited to vote on a matter relating to a policy or contract held with one of the Scheme's investment managers, the Trustee will exercise its right in accordance with what they believe to be in the best interests of the majority of the Scheme's membership.

5.4 Member Views

The Trustee does not explicitly take account of member views when selecting investments for the Scheme. However, the Trustee believes that they have a good understanding of membership demographics, behaviours and preferences and strives to provide a fund range that meets financially relevant member needs. The Trustee is committed to reviewing this policy on an ongoing basis and may from time to time run member opinion polls and consider the results of these.

6 Risks

The Trustee is aware, and seeks to take account, of a number of risks in relation to the Scheme's investments, including those set out below. Under the Pensions Act 2004, the Trustee is required to state their policy regarding the ways in which risks are to be measured and managed. These are also set out below.

The Trustee recognises that in a defined contribution arrangement, members assume the investment risks themselves. The Trustee further recognises that members are exposed to different types of risk at different stages of their working lifetimes. Broadly speaking, five main types of investment risk can be identified, as noted below:

Type of Risk	Risk	Description	How is the risk monitored and managed?
Market Risk	Inflation Risk	The risk that a member's investments will not grow quickly enough to sufficiently outpace inflation (the cost of living).	<p>The Trustee makes available a range of funds across various asset classes, with the majority expected to at least keep pace with inflation.</p> <p>Members are able to set their own investment allocations, in line with their risk tolerances.</p> <p>The default lifestyle strategy is designed with the intention of diversifying these risks to reach a level of risk deemed appropriate given members objectives at different ages. This is set with the advice from the investment adviser.</p>
	Currency Risk	This is the risk that occurs when the price of one currency moves relative to another (reference) currency. In the context of a UK pension scheme, the scheme may be invested in overseas stocks or assets, which are either directly or indirectly linked to a currency other than Sterling. There is a risk that the price of that overseas currency will move in such a way that devalues that currency relative to Sterling, thus negatively impacting the overall investment return.	
	Credit Risk	This is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation.	
	Other Price Risk	This is the risk that principally arises in relation to the return seeking portfolio, which invests in equities, equities in pooled funds, equity futures, hedge funds, private equity and property.	
Environmental and social and governance risks	This is the risk that ESG concerns, including climate change, have a	Where applicable these factors will be considered in the investment process but	

	<p>financially material impact on the return of the Scheme's assets.</p> <p>These risk factors can have a significant effect on the long-term performance of the assets the Scheme holds.</p>	<p>is considered the responsibility of the investment managers.</p> <p>Please see Section 5 for the Trustee's responsible investment statement.</p>
Pension Conversion Risk	<p>This is the risk where assets are invested to target a specific retirement objective which differs from how members are expected to use their pots at retirement.</p>	<p>The default strategy is a lifestyle which automatically and gradually switches member assets into investments that are expected to be less volatile. The asset allocation at retirement is considered suitable for members who are yet to decide how they're going to take their retirement income, or if they want to take a flexible income (income drawdown).</p> <p>Members may target other retirement outcomes by using the available self-select funds, for example by using the Jupiter Pre-Retirement Fund to target annuity purchase.</p> <p>Communications are sent to members as they approach retirement to help them decide the right investments for their circumstances.</p>
Manager risk	<p>This is assessed as the expected deviation of the prospective risk and return, as set out in the managers' objectives, relative to the investment policy.</p>	<p>It is measured by monitoring the actual deviation of returns relative to the objective and factors supporting the manager's investment process through the quarterly performance updates provided by the investment managers.</p>
Liquidity risk	<p>The risk that the Scheme's assets cannot be realised at short notice in line with member or Trustee's demand.</p>	<p>As far as is practicable and necessary, the Trustee invests in liquid assets that can be quickly realised as required.</p> <p>The Scheme's investment managers only invest in readily realisable pooled funds that can be bought and sold on a daily basis. Members of the Scheme can trade their investments on a monthly basis.</p> <p>Investment managers are expected to manage the liquidity of assets in the underlying strategies and keep exposures to any illiquid assets to prudent levels.</p>

7 Monitoring of investment adviser and managers

7.1 Investment adviser

The Trustee continually assesses and reviews the performance of their adviser in a qualitative way.

7.2 Investment managers

Investment managers are appointed based on their capabilities and, therefore, their perceived likelihood of achieving the expected return and risk characteristics required for the asset class in which they invest.

The Trustee considers its investment adviser's forward-looking assessment of a manager's ability to outperform over a full market cycle. This view will be based on an assessment of the manager's idea generation, portfolio construction, implementation and business management in relation to the particular investment fund that the Plan invests in.

The Trustee will consider how ESG and stewardship are integrated into the investment process as well as ensuring fees are competitive within the asset class. The Trustee considers the investment adviser's manager research ratings when taking decisions on selection and retention of manager appointments.

If the investment objective for a particular manager's fund changes, the Trustee will review the fund appointment to ensure it remains appropriate and consistent with the Trustee's wider investment objectives.

As the Trustee invests in pooled investment vehicles, it accepts that it has no ability to specify the risk profile and return targets of the manager, but appropriate mandates have been selected to align with the overall investment strategy.

The Trustee receives regular investment manager performance reports on a quarterly basis, which present performance information over a variety of time periods. The Trustee reviews the absolute and relative performance (against a suitable benchmark index), and against the manager's stated performance target.

The Trustee maintains a focus on long-term performance. It may review a manager's appointment if the manager has extended periods of underperformance, there is a material change in personnel or there is other news that may severely impact the outcome of the investment.

Manager fees are calculated as a percentage of assets under management. If managers fail to meet their performance objectives, the Trustee may ask managers to review their fee. As part of the annual Value for Money assessment, the Trustee reviews the investment manager fees. The Trustee acknowledges that investment management fees incurred by Jupiter Asset Management are rebated to members. The Trustee considers portfolio turnover costs as part of the annual value for money assessment and asks investment managers to include portfolio turnover and turnover costs in their presentations and reports to the Trustee.

The Trustee normally meets the investment manager formally each quarter to review the investment manager's actions together with the reasons for and behind the investment performance.

Mercer will advise the Trustee of any significant developments of which it is aware relating to the underlying investment managers, or funds managed by the underlying investment managers in which the assets of the Scheme are invested.

The Trustee also monitors the stewardship track record of the Scheme's investment managers on an annual basis and will take action if this is found inconsistent with appropriate long-term return generation.

The Trustee is a long-term investor and is not looking to change investment arrangements on a frequent basis. All the funds are open-ended with no set end date for the arrangement. The default lifestyle strategy and the self-select fund range are reviewed on at least a triennial basis. A manager's appointment may be terminated if it is no longer considered to be optimal nor have a place in the default strategy or general fund range.

8 Code of best practice

The Pensions Regulator has published a new code on standards for DC schemes and this came into effect in November 2013 as part of a wider initiative to get DC right. This was updated further on 28 July 2016 and this revised version is shorter and simpler than its predecessor and has been updated to include the DC flexibilities and governance legislation introduced from April 2015.

The Code of Practice 13 on the governance and administration of occupational DC trust based schemes places bigger than ever emphasis on good quality investment arrangements and stricter requirements for reviewing these on the Trustee. Particular attention has to be paid to the design of default strategies and on-going monitoring of their continuing suitability for scheme membership. The Code can be found here:

<https://www.thepensionsregulator.gov.uk/en/document-library/codes-of-practice/code-13-governance-and-administration-of-occupational-trust-based-schemes-providing-money-purchase>

When formulating their investment policy, the Trustee has acted in line with the Code of Practice 13.

9 Compliance

The Scheme’s Statement of Investment Principles is available to members on request and is, together with the Chair’s Statement, published here: www.jupiteram.com/corporate/Governance/Jupiter-Pension-Scheme

A copy of the Scheme’s current Statement plus Appendices is also supplied to the Principle Employer, the Scheme’s investment manager, auditors and administrators.

This Statement of Investment Principles, taken as a whole with the Appendices was approved by the Trustee on 16 September 2020

Signed on behalf of the Jupiter Pension Scheme

On 29 September 2020

Full Name R A Brougham

Position For BESTrustees Limited as Trustee of the Jupiter Pension Scheme

Appendix 1: Investment manager information

The Trustee will monitor the suitability of the funds used on an ongoing basis and make changes as they consider appropriate. The table below shows the details of the available funds.

Charges shown under the Ongoing Charges Figure heading are those that apply directly to members' investments, after accounting for the rebate of Jupiter Asset Management Ltd fees. Under the current charging structure set out in the Scheme handbook, costs for professional services incurred by the Trustee and costs relating to the administration of the Scheme are borne by the members. From April 2020, these costs will be met by means of a monthly fixed basis point charge applied on members' funds. The fixed basis point charge is the same rate across all funds of the Scheme. This rate will initially be 0.20% p.a. and will be reviewed by the Trustee every six months.

Default Strategy Funds

Fund	Benchmark	Objective	Ongoing Charges Figure
Jupiter Pension Scheme Global Equity Fund	MSCI AC World Index	To achieve long term capital growth by investing in unit trusts, OIECs, ETFs, and other collective investment schemes.	0.54%*
Jupiter Pension Scheme Balanced Fund	FTSE UK Private Investor Balanced TR Index	To outperform the benchmark by 1.5% p.a., net of fees, on a rolling 3 year basis.	Capped at 0.75%*
Jupiter Pension Scheme Distribution Fund	IMA Sector Mixed Investment 0-35% shares	To provide a sustainable level of income and the prospect of capital growth over the long term by investing in an actively balanced portfolio of fixed interest securities and equities (mainly UK).	0.21%*

*The Ongoing Charges Figure will fall below the statutory charge cap for default arrangements of 0.75%.

Self-Select Funds

Fund	Benchmark	Objective	Ongoing Charges Figure
Jupiter Pension Scheme Global Equity Fund	MSCI AC World Index	To achieve long term capital growth by investing in unit trusts, OIECs, ETFs, and other collective investment schemes.	0.54%
Jupiter Pension Scheme Balanced Fund	FTSE UK Private Investor Balanced TR Index	To outperform the benchmark by 1.5% p.a., net of fees, on a rolling 3 year basis.	Capped at 0.75%
Jupiter Pension Scheme Merlin Growth Fund	FTSE UK Private Investor Growth TR Index	To achieve long term capital growth by investing in unit trusts, OIECs, ETFs, and other collective investment schemes.	0.96%

Jupiter Pension Scheme Pre-Retirement Fund*	37.5% iBoxx Sterling Corp All Maturities Total Return GBP 26.25% FTSE Actuaries UK Conv. Gilts All Stocks Index 11.25% Barclays UK Govt Index-Linked Bond Index GBP 25% 7 Day LIBID GBP	To outperform the benchmark on a rolling 3 year basis, net of fees.	0.20%
Jupiter Pension Scheme Distribution Fund	IMA Sector Mixed Investment 0-35% shares	To provide a sustainable level of income and the prospect of capital growth over the long term by investing in an actively balanced portfolio of fixed interest securities and equities (mainly UK).	0.21%
Jupiter Pension Scheme Global Sustainable Equity Fund	MSCI AC World Index	To outperform the benchmark, net of fees, over the long-term (at least five years).	0.50%
Jupiter Pension Scheme Threadneedle TPEN Property Fund**	MSCI/AREF All Balanced Property Funds	To invest primarily in direct UK commercial property and aims to outperform the benchmark, net of fees, over 3-year rolling periods.	1.00%
Jupiter Pension Scheme Northern Trust Sterling Fund	7-day LIBID	To preserve capital, maintain liquidity and generate income by investing in high quality fixed-income securities denominated in GBP.	0.28%

*The Trustee considers the Jupiter Pre-Retirement Fund to be an additional default arrangement (see Section 4.3 for further details). The benchmark of this fund was changed with affect from 28 February 2020.

** At the time of writing, this fund has not yet been made available as a self-select option. The Trustee is in the process of making the fund available and hopes for this to be completed soon.

Appendix 2: Responsibilities of parties

Trustee

The Trustee's responsibilities include the following:

- Reviewing at least triennially and more frequently if necessary, the content of this Statement in consultation with the Investment Adviser and modifying it if deemed appropriate
- Selecting the Investment Managers
- Assessing the quality of the performance and processes of the Investment Managers by means of regular reviews of investment returns and other relevant information, in consultation with the Investment Adviser
- Consulting with the Principal Employer regarding any proposed amendments to this Statement
- Monitoring compliance of the investment arrangements with this Statement on a continuing basis
- Publishing this Statement on a publically available website and informing members of the location

Investment adviser

The Investment Adviser's responsibilities include the following:

- Participating with the Trustee in reviews of the Statement of Investment Principles
- Advising of any significant developments of which it is aware relating to the investment managers, or funds managed by the investment managers in which the Scheme is invested.
- Updating the Trustee on changes in the investment environment, and advising the Trustee, at their request, on how such changes could present either opportunities or risks for the Scheme
- Undertaking project work, as requested, including:
 - » Reviews of the investment strategy and fund range; and
 - » Research into and reviews of Investment Managers.
- Advising on the selection of new managers and/or custodians

Investment managers

The Investment Managers' responsibilities include the following:

- Providing the Trustee on a quarterly basis (or as frequently as required) with a statement and valuation of the assets and any changes to the processes applied to their portfolios
- Informing the Trustee of any changes in the internal performance objectives and guidelines of any pooled fund in which the Scheme is directly invested as and when they occur
- Having regard to the need for diversification of investments, so far as appropriate for the particular mandate, and to the suitability of investments
- Managing their funds in accordance with their stated mandates