

BSS Group Pension Scheme

Implementation Statement for the year ended 30 September 2022

Purpose

This Implementation statement provides information on how, and the extent to which, the Trustee of the BSS Group Pension Scheme (“the Scheme”) has followed their policy in relation to the exercising of rights (including voting rights) attached to the Scheme’s investments, and engagement activities have been followed during the year ended 30 September 2022 (“the reporting year”). In addition, the statement provides a summary of the voting behaviour and most significant votes cast during the reporting year.

Latest review of the Statement of Investment Principles

The latest version of the Scheme’s SIP came into effect in July 2020 and was applicable during the reporting year.

Investment-related activity during the reporting year

Significant changes

During the reporting year, Ross Trustees Services Limited replaced BSS GPS Trustee limited as Trustee to the BSS Group Pension Scheme. At the year end, the Trustee, together with the Investment Adviser, continued to explore potential changes of the Scheme.

Asset allocation / fund reviews

In understanding that asset allocation plays an important role in achieving investment objectives, the Trustee regularly monitors the asset allocation of the Scheme to ensure that this is in line with their current investment objectives.

During the reporting period, the Trustee disinvested from the property allocation (LGIM LPI Income Property Fund and M&G Secured Property Income Fund).

Trustee training

Over the course of the reporting year, the Trustee received training on the following investment topics:

- Environmental, Social and Governance (“ESG”) and sustainability considerations.
- Taskforce for Climate Related Financial Disclosures (TCFD) Framework and recommendations.

Manager Presentations

During the reporting year, the following managers attended the Trustee meetings to provide fund updates:

- Insight Investments
- Royal London Asset Management.

CMA Objectives / Order

During the reporting year, the Trustee reviewed their investment consultant objectives in line with the 10 June 2019 CMA Order.

How the SIP has been followed during the year

The Trustee has various investment policies for the Scheme on the topics listed in the tables below; the tables also provide commentary on how and the extent to which the various policies were followed during the reporting year

Policy	How the policy was followed
<p>Scheme governance</p> <p>The Trustee’s policy is to be accountable for the investment of the Scheme’s assets and has the responsibility to manage the Scheme’s affairs effectively. The Trustee decides what to delegate after considering whether they have the necessary skills, knowledge, and professional support to make informed and effective decisions. The Trustee delegates some aspects of the Scheme’s investment arrangements to third party service providers, in order to manage the Scheme’s affairs effectively. The Trustee retains overall responsibility and decision-making power over investment objectives, implementing the investment strategy, the target level of risk and return, investment strategy (the allocation between the main asset classes) and whether to invest in new asset classes.</p>	<p>The Trustee continues to work closely to ensure their policies are met. This includes obtaining written advice from their investment advisors where required. The investment managers are responsible for the day-to-day management of the Scheme’s assets in accordance with the mandates agreed with the Trustee.</p> <p>The Trustee is satisfied that they are following this policy in full.</p>
<p>Investment Objectives</p> <p>The Trustee’s primary investment objective is to invest the Scheme’s assets, within an agreed risk profile, in such a manner that members’ benefit entitlements can be paid as and when they fall due.</p>	<p>The Trustee regards the funds held in the Scheme to be appropriate by incorporating assets of appropriate income and liquidity to meet the Trustee’s overall investment objectives and to aim to ensure members’ benefits can be paid as they fall due.</p> <p>The Trustee is satisfied that they are following this policy in full.</p>
<p>Risk and Return</p> <p>The Trustee’s targets a return consistent with the assumptions made in determining the Scheme’s Technical Provisions. The Trustee’s policy is to invest in a diversified portfolio of return seeking assets and liability matching assets to meet that level of return at controlled levels of risk.</p>	<p>The funds held by the DB Section incorporated both return seeking assets (e.g. buy and maintain credit, secured finance) and liability matching assets (Liability Driven Investments).</p> <p>The Scheme maintains a risk register of the key risks, including the investment risks. This rates the impact and likelihood of the risks and summarise existing mitigations and additional actions.</p> <p>The Trustee is satisfied that they are following this policy in full.</p>

<p>Diversification of risks</p> <p>The Trustee seeks to spread risks across a range of different sources. They consider the following risks, which they consider as financially material to the Scheme over its anticipated lifetime.</p> <ul style="list-style-type: none"> - Interest rate risk - Inflation risk - Credit risk - Currency risk - Other price risk - Environmental, Social and Governance (ESG) risk and climate change risk. 	<p>The Trustee receives strategic investment advice from the Investment Adviser that includes risk modelling and quantification (e.g. Value at Risk) whenever strategic changes are considered. The Trustee considers both quantitative and qualitative measures for these risks when deciding on strategic asset allocation, deciding on investment policies and the choice of funds, fund managers and asset classes. The Trustee employs liability hedging to explicitly limit interest rate and inflation risk within the Scheme. The Investment Manager’s role and approach to managing risk is part of the ongoing monitoring of such managers, particularly when selecting a new Investment Manager during any investment strategy review actions.</p> <p>The Trustee is satisfied that they are following this policy in full.</p>
<p>Investment Manager Appointment, Engagement and Monitoring</p> <p>The Trustee policy is in relation to:</p> <ul style="list-style-type: none"> - Aligning manager appointments with investment strategy - Evaluating investment manager performance 	<p>The Trustee receives quarterly reporting from their Investment Adviser, which includes the asset allocation and compares this with the desired long term strategic allocation. The quarterly report also includes an update on the markets over the period and any market risks on the horizon are highlighted as part of XPS’ presentation at the Trustee meeting when appropriate. This quarterly monitoring provided by XPS furnishes the Trustee with the underlying asset class/sector exposures to monitor any unintended risk being taken.</p> <p>The Trustee is satisfied that they are following this policy in full.</p>
<p>Portfolio Turnover Costs</p> <p>The Trustee does not actively monitor the portfolio turnover costs of the assets. The Trustee will continue to monitor industry improvements concerning the reporting of portfolio turnover costs.</p>	<p>Investment manager performance is reported net of transaction costs and therefore managers are incentivised to keep portfolio turnover costs to a minimum.</p> <p>Manager’s remuneration is taken into consideration during manager selection exercises, to ensure the Scheme is not paying excessive fees that would detract from the Scheme’s return.</p> <p>The Trustee has commissioned a review of the ongoing costs borne by the Scheme (cost transparency initiative).</p> <p>The Trustee is satisfied that they are following this policy in full.</p>

<p>Manager Turnover</p> <p>The Trustee is a long term investor and do not look to change investment arrangements on a frequent basis. The Trustee will retain an investment manager unless:</p> <ul style="list-style-type: none"> – There is a strategic change to the overall strategy that no longer requires exposure to that asset class or manager; – The manager appointment has been reviewed and the Trustee is no longer comfortable that the manager can deliver the mandate. 	<p>During the reporting year, the Scheme’s investments in LGIM LPI Income Property Fund and M&G Secured property Income Fund were divested from as a de-risking step to reduce both the risk and the expected return to a more prudent level.</p> <p>As at the end of the reporting year, the Trustee remained comfortable that the respective investment managers can deliver their mandates.</p> <p>The Trustee is satisfied that they are following this policy in full.</p>
<p>Responsible Investment and Corporate Governance</p> <p>The Trustee’s policy is for the Trustees to consider how ESG, climate change and stewardship is integrated within investment processes in appointing new investment managers and monitoring existing investment managers.</p>	<p>When implementing a new manager, the Trustee considers the ESG rating of the manager. There were no new manager appointments over the year. In any future investment strategy reviews, the Trustee will take into consideration manager ESG ratings.</p> <p>The Trustee is reviewing the Buy & Maintain Credit mandates from an ESG and sustainability perspective.</p> <p>The Trustee is satisfied that they are following this policy in full.</p>

<p>Non-financial matters</p> <p>The Trustee’s policy is to act in the best interests of the beneficiaries of the Scheme when selecting, retaining or realising investments. It has neither sought nor taken into account the beneficiaries’ views on risks including (but not limited to) ethical, social and environmental issues.</p>	<p>the Trustee delegates the management of scheme assets to the investment managers. The investment managers are expected to take account of non-financial considerations within the decision-making process.</p> <p>The Trustee is satisfied that they are following this policy in full.</p>
<p>Voting rights</p> <p>The Trustee has delegated responsibility for the exercise of rights (including voting rights) attached to the Scheme’s investments to the investment managers.</p>	<p>The investment managers are expected to vote in accordance with their internal voting policies.</p> <p>The Trustee is satisfied that they are following this policy in full.</p>

Voting activity

The Trustee has delegated responsibility for the exercise of rights (including voting rights) attached to the Scheme’s investments to the investment managers and encourages them to engage with investee companies and vote whenever it is practical to do so on financially material matters such as strategy, capital structure, conflicts of interest policies, risks, social and environmental impact and corporate governance as part of their decision-making processes. The Trustee requires the investment managers to report on significant votes made on behalf of the Trustee.

The voting activity of the Scheme over the reporting year is in relation to the funds the Scheme was invested into throughout the period. The main asset class where the investment managers will have voting rights is equities, as it represents the equity ownership and shareholder’s stake within the underlying business. There are likely to be no voting rights for credit-based assets or funds that invest into them, such as the underlying securities held within the segregated accounts. The allocation to Secured finance will also not have voting rights due to the nature of the underlying holdings.

Therefore, due to the nature of the holdings of the Scheme, there is no voting activity to report for the Scheme.

Signed: _____

On behalf of Ross Trustees Services Limited as Trustee of the BSS Group Pension Scheme.

Date: _____