



# Dunham-Bush Retirement Benefits Plan

Statement of Investment Principles

As at August 2024

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## Executive Summary

This Statement of Investment Principles ("the Statement") has been prepared by the Trustee of the Dunham-Bush Retirement Benefits Plan ("the Plan").

It has been prepared to comply with Section 35 of the Pensions Act 1995 as amended by the Pensions Act 2004 and the Occupational Pension Plans (Investment) Regulations 2005 and as amended by subsequent regulations.

For the purposes of the report, the insolvent sponsor Dunham-Bush Limited is referred to as the 'Sponsor'.



## Introduction

This Statement sets out the principles governing decisions about investments for the Plan and supersedes the previous Statement prepared by the Trustee of the Plan (“the Trustee”).

In preparing this Statement, the Trustee has:

1.	Consulted with the Pension Protection Fund ('PPF'), although responsibility for maintaining this Statement and setting investment policy rests solely with the Trustee.
2.	Obtained and considered written professional advice and recommendations from Spence and Partners Limited (“Spence”) who are the Trustee’s appointed investment adviser. Spence is authorised and regulated by the Financial Conduct Authority (“FCA”). It has confirmed to the Trustee that it has the appropriate knowledge and experience to give the advice required by the Pensions Acts.

The Plan has entered a PPF assessment period and is expected to transfer to the PPF. Whilst in an assessment period the Trustee retains responsibility for the day to day management of the Plan. The Trustee does not expect to revise this statement as it covers broad principles rather than their implementation and the strategy of the Plan is expected to be stable whilst the Plan is in an assessment period, up until the point the Plan transfers to the PPF. If there are any significant changes in any of the areas covered by this Statement, the Trustee will review it without further delay. Any changes made will be based on written advice from a suitably qualified individual and will follow on from consultation with the PPF.

The Trustee’s investment powers are set out in the Trust Deed dated 16 April 1987.



## Investment Objectives

The Plan has entered the assessment period for the Pension Protection Fund ("PPF") as the Sponsor has become insolvent. The Trustee's overall investment policy is guided by the following objectives:

1. The Trustee's primary investment objective for the Plan is to ensure sufficiently liquid assets are available to meet all liabilities as and when they fall due.
2. The Plan is in a PPF assessment period and will align itself with the PPF's long term objectives and ensure risk to members is minimised following the insolvency of the Sponsor.



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# Investment Responsibilities

## The Trustee

Under the legal documentation governing the Plan, the power of investment is vested in the Trustee. Therefore, the Trustee is responsible for setting the investment objectives and determining the strategy to achieve those objectives. It sets the overall investment target and then monitor the performance of its investment managers against the target. In doing so the Trustee considers the advice of its professional advisers, who they consider to be suitably qualified and experienced for this role.

Its duties and responsibilities include but are not limited to:

- Regular approval of this Statement and monitoring compliance with this Statement
- Appointment, removal (where applicable) and review of its investment managers or investment adviser and their performance relative to relevant benchmarks
- Assessment of the investment risks run by the Plan
- Monitoring and review of the asset allocation

## Investment Adviser's Duties and Responsibilities

The Trustee has appointed Spence as their investment consultant. Spence provides advice when the Trustee requires it and/or when Spence feels it suitable to do so. Areas on which it can provide advice are as follows:

- Setting investment objectives
- Determining strategic asset allocation
- Determining suitable funds and investment managers
- Managing cashflow

It should be noted that the Trustee retains responsibility for all decisions.

Spence charges a fixed fee for investment services. Any extra services provided by Spence will be remunerated on a time cost or fixed fee basis as agreed with the Trustee.

Spence does not receive any commission or any other payments in respect of the Plan for investment services that will affect the impartiality of their advice.

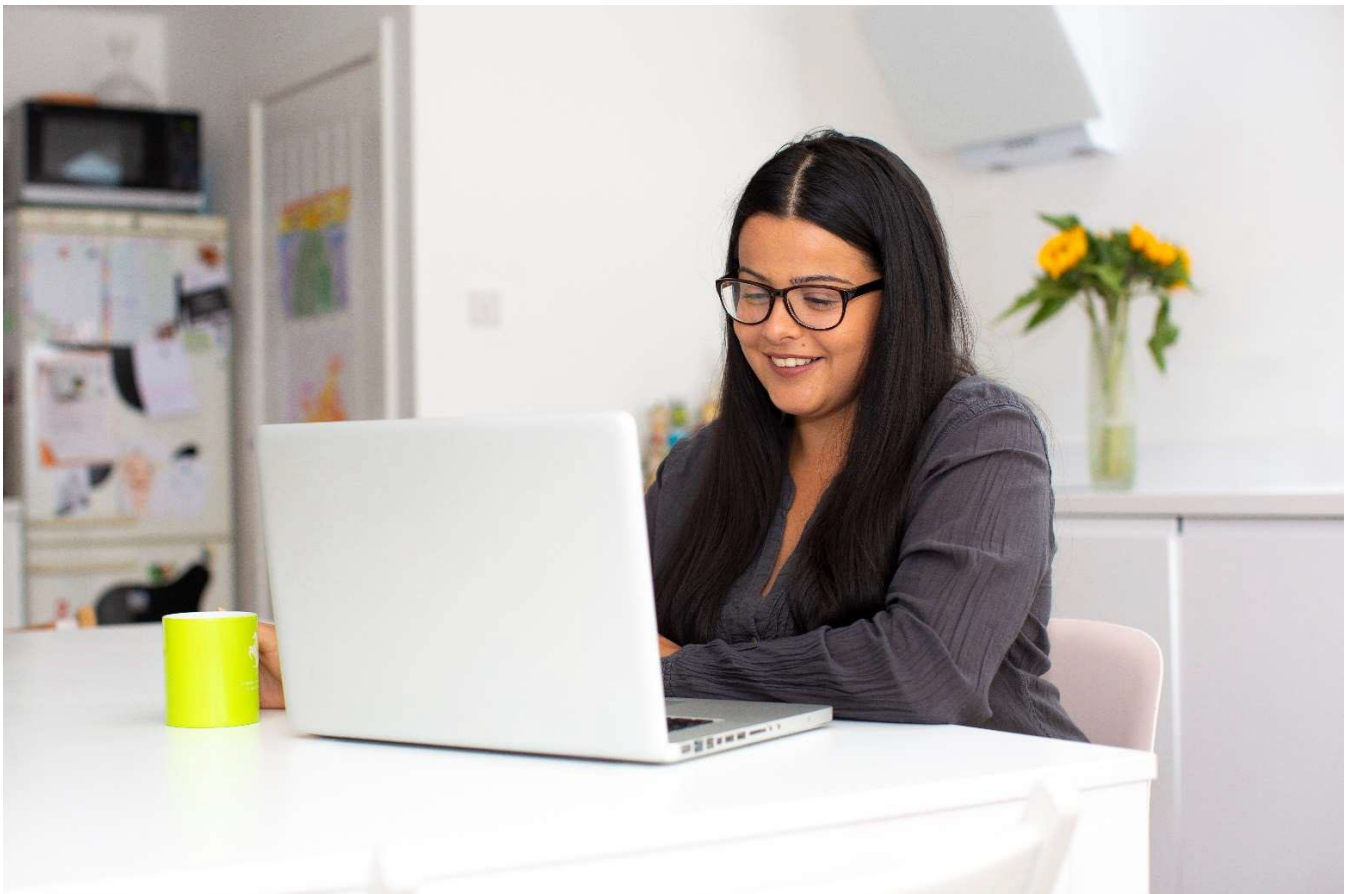
The Trustee is satisfied that this is a suitable adviser compensation structure.

## Investment Managers' Duties and Responsibilities

The Trustee, after considering suitable advice, has appointed Legal & General Investment Management ('LGIM') to manage the assets of the Plan via the Mobius Life Limited's ('Mobius') investment platform.

The underlying investment manager is detailed in the Appendix of this Statement. The underlying investment manager is authorised and regulated by the FCA and is responsible for stock selection, asset allocation (if managing a multi-asset portfolio) and the exercise of voting rights. The underlying manager is compensated by fund-based charges on the value of the Plan's assets that they hold.

**The Plan's agreed asset allocation is defined in the Appendix.**



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# Setting the Investment Strategy

The Trustee has determined its investment strategy after considering the PPF's long term strategic objective and guidance given on setting investment strategy. It has also received written advice from its investment consultant.

## Types of Investment

The Plan's assets are invested on behalf of the Trustee by Mobius, through an investment platform, with an underlying investment manager.

The Trustee is permitted to invest across a wide range of asset classes, including but not limited to equities, bonds, cash, property and alternatives. The use of derivatives is as permitted by the guidelines that apply to the pooled funds. The Trustee understands that some asset classes provide a better match to the liabilities than others and is investing in gilts and index linked gilts to minimise risk relative to the Plan's liabilities.

The Plan is in a PPF assessment period and there are no employer-related investments.

## Balance Between Different Types of Investment

The Plan invests in assets that are expected to achieve the Plan's objectives detailed previously. The allocation between the different asset classes is shown in the Appendix of this Statement.

The Trustee has considered the merits of both active and passive management for the different elements of the asset allocation and selected suitable types of management for each asset class. The Trustee has chosen to invest in passively managed funds. The current manager is shown in the Appendix.

From time-to-time the Plan may hold cash and therefore deviate from its strategic or tactical asset allocation in order to accommodate any short-term cashflow requirements or any other unexpected events.

The Trustee may also hold insurance policies which are for the benefit of certain members to match part, or all, of its liabilities.

## Expected Return on Investments

The Trustee has noted the long-run relationships that exist between the returns from different asset classes and has noted the different expected risk/return characteristics of the various asset classes.

The Trustee's chosen policy is to stabilise the Plan's funding level rather than to pursue higher expected returns to improve the Plan's funding level. Therefore, it invests solely in gilts and index linked gilts.

## Realisation of Investments

The Plan's assets are invested in pooled vehicles, which in turn invest in securities traded on recognised exchanges. The Plan's investments in gilts and index linked gilts are very liquid and can be realised at short notice.



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## Financially Material Considerations

The Trustee has considered financially material factors such as environmental, social and governance ('ESG') issues as part of the investment process to determine a strategic asset allocation over the length of time during which the benefits are provided by the Plan for members. Such matters are assessed for materiality and impact within a broader risk-management framework, which takes account of the Trustees' funding timeframe and views on the Sponsor's covenant.

In endeavouring to invest in the best financial interests of the beneficiaries, the Trustee has elected to invest through pooled funds.

The Plan is invested in gilts and index linked gilts and there is limited scope to take into account financially material considerations and socially responsible investment. However, the Trustee does expect its fund manager and investment adviser to take account of financially material considerations when carrying out their respective roles, where possible.

The Trustee will only invest with investment managers that are signatories for the United Nations supported Principles of Responsible Investment ('UN PRI') or other similarly recognised standards.

## Non-Financial Material Considerations

The Trustee has not considered non-financial material matters in the selection, retention and realisation of investments.

## Stewardship

The Trustee's policy on the exercise of rights attaching to investments, including voting rights, is that these rights should be exercised by the investment manager on the Trustee's behalf, having regard to the best financial interests of the beneficiaries.

The investment manager should engage with companies that take account of ESG factors in the exercise of such rights as the Trustee believes this will be beneficial to the financial interests of members over the long term.

The Trustee invests in gilts and index linked gilts and so there are no voting rights and limited scope to engage in the investments, however, it does encourage the fund manager to do so where possible.

The Trustee has taken into consideration the Financial Reporting Council's UK Stewardship Code and expects investment managers to adhere to this where appropriate for the investments they manage.

## Investment Manager Arrangements

### **Incentives to align investment managers' investment strategies and decisions with the Trustee's policies**

The Plan invests in pooled funds and so the Trustee acknowledges that decisions cannot be tailored to the Trustee's policies. However, the Trustee sets its investment strategy and then selects managers that best suits its strategy, taking into account the fees being charged, which acts as the fund manager's incentive.

### **Incentives for the investment managers to make decisions based on assessments about medium to long-term financial and non-financial performance of an issuer of debt or equity and to engage with issuers of debt or equity in order to improve their performance in the medium to long-term**

The Trustee invests passively solely in gilts and index linked gilts and there is no scope to improve the financial performance of the UK Government.

**How the method (and time horizon) of the evaluation of the investment managers' performance and the remuneration for asset management services are in line with the Trustee's policies**

The Trustee will review quarterly reports from its investment manager, who reports performance on a net of fees basis compared to its benchmark.

The Trustee assesses the performance of the funds, where possible, over at least a 3-5 year period when selecting a manager and will always consider this when looking to select or terminate a manager together with other relevant factors other than performance after obtaining advice from the investment consultant.

The fund manager's remuneration is considered as part of the manager selection process and will only be looked at in greater detail if it increases.

As the timeframe before the assets are sold is 12-24 months the Trustee will only take action to replace the manager in extreme circumstances on receipt of advice from the investment consultant.

**How the Trustee monitors portfolio turnover costs incurred by the investment managers, and how they define and monitor targeted portfolio turnover or turnover range**

The Trustee does not monitor portfolio turnover costs incurred by the asset manager as it is not a financially material concern over the relevant investment time horizon.

**The duration of the arrangement with the investment managers**

The Plan is in a PPF assessment period and is only expected to hold the investments until it is transferred into the PPF, which is likely to be relatively short.

**Additional Voluntary Contributions ("AVCs") Arrangements**

The Plan provides a facility for members to pay for AVCs to enhance their benefits at retirement with Royal London and Prudential. Members are offered a range of funds in which to invest their AVCs. From time to time the Trustee will review the choice of investments available to members to ensure that they remain appropriate to the members' needs.

## Risks

The Trustee recognises that whilst increasing risk may increase potential returns over a long period, it also increases the risk of producing more short-term volatility in the Plan's funding position. Following the commencement of the PPF assessment period for the Plan, the Trustee's focus has had to change away from targeting longer term growth towards protecting against short-term volatility. The overall level of investment risk is significantly influenced by the guidelines issued by the PPF for asset allocation during a PPF assessment period. A policy on more detailed risk issues is determined by the Trustee having considered expert advice (that includes assessment of the cost of change) and feedback from the PPF.

The Trustee is aware and seeks to take account of a number of risks in relation to the Plan's investments. Under the Pensions Act 2004, the Trustee is required to state its policy regarding the ways in which risks are to be measured and managed. The key risks and the policies are as follows:

<b>Solvency and Mismatching Risk</b>	The Sponsor is insolvent and so the investment strategy is set to minimise risk relative to the liabilities.
<b>Concentration Risk</b>	The Plan is invested in gilts and index linked gilts so in normal markets this risk should be minimal.
<b>Investment Manager Risk</b>	This is assessed as the deviation of actual risk and return relative to that specified in the investment managers' objectives. It is measured by monitoring on a regular basis the actual deviation of returns relative to investment managers' agreed objectives and an assessment of factors supporting the managers' investment process.
<b>Sponsor Risk</b>	The Plan is in a PPF assessment period and so this risk is no longer applicable.
<b>Liquidity Risk</b>	This is monitored according to the level of cashflows required by the Plan over a specified time period. The Plan's administrators will assess the cash requirements to limit the impact of cashflow requirements on the Plan's investment policy. The risk is managed by having a suitable amount of readily realisable investments and by holding a certain level of cash type assets. The Plan invests in assets that there are invested in quoted markets and are as readily realisable as the Trustee feels suitable given the Plan's cashflow position and the expected development of the liabilities.
<b>Currency Risk</b>	The Plan's liabilities are denominated in sterling and so are all of its investments. Therefore, the Plan is not exposed to currency risk.
<b>Loss of Investment Risk</b>	There is a risk of loss of investment by each investment manager and potentially the custodian. This includes losses beyond those caused by market movements e.g. losses caused by fraud. The Trustee understands the investment manager has ringfenced the funds and uses an independent custodian and believes this will minimise the risk of loss.
<b>Environmental, Social and Governance (ESG) and Climate Change Risks</b>	There is a risk that ESG issues and climate change are not considered as part of the investment process and so may expose the portfolio. This can lead to losses that may not have been factored into any assumptions. The Trustee has considered ESG issues including climate change as part of the investment process.

# Compliance

The Trustee confirms that it has received and considered written advice from Spence on the establishment and implementation of its investment strategy.

The Trustee confirms that it has consulted with the PPF regarding their strategy.

The Trustee will monitor compliance with this Statement at least every three years or if any significant changes are made to the investment strategy.

NAME (block capitals)

[Redacted]

Signed

[Redacted]

**Trustee**

**Signed for and on behalf of the Trustee Dunham-Bush Retirement Benefits Plan**

Date of Signing: 16/08/2024



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# Appendix

## Appendix: Strategic Asset Allocation

The Plan has a strategic asset allocation as set out in the table below:

Asset Class	Fund	Allocation	Control Range
Index Linked Gilts	LGIM Under 15 Year Index-Linked Gilts Index Fund	1%	+/-0.5%
	LGIM Over 15 Year Index-Linked Gilts Index Fund	23%	+/- 4.5%
Fixed Interest Gilts	LGIM 5 - 15 Year Gilts Index Fund	54%	+/- 10.0%
	LGIM Over 15 Year Gilts Index Fund	22%	+/- 4.5%
<b>Total</b>		<b>100%</b>	

### Rebalancing and Cashflow management

The Trustee recognises that the asset allocation of investments will vary over time due to market movements. The Trustee seeks to keep the asset allocation in line with its benchmark but is cognisant of the costs of rebalancing.

Where possible, cash outflows will be met from the income of the Plan's assets to minimise transaction costs. Where income is insufficient monies will be raised through the sale of assets so as to move the allocation closer to the central benchmark allocation subject to consideration of liquidity issues, transaction costs, market conditions and the speed with which monies are required. Similarly, where cashflows in are received, the money will be invested in such a way as to bring the allocation into line with the central benchmark allocation.

## Investment Managers

The Trustee invests the assets of the Plan through an insurance policy with Mobius Life. The table below shows the investment manager that the Trustee has appointed to carry out the day to day management of the assets, as well as the funds that they manage, its benchmarks and relevant objectives.

Investment Manager	Fund	Benchmark	Objective
Legal and General Investment Management ("LGIM")	Under 15 Year Index-Linked Gilts Index Fund	FTSE Actuaries UK Index-Linked Gilts up to 15 Years Index	Track benchmark within +/- 0.25% p.a. for two years out of three
	Over 15 Year Index-Linked Gilts Index Fund	FTSE Actuaries UK Index-Linked Gilts Over 15 Years Index	Track benchmark within +/- 0.25% p.a. for two years out of three
	Under 5 - 15 Year Gilts Index Fund	FTSE Actuaries UK Gilts 5-15 Years Index	Track benchmark within +/- 0.25% p.a. for two years out of three
	Over 15 Year Gilts Index Fund	FTSE Actuaries UK Gilts Over 15 Years Index	Track benchmark within +/- 0.25% p.a. for two years out of three

## Fees

The fee arrangements for the investment managers are summarised below:

Investment Manager	Fund	Annual Management Charge
LGIM	LGIM Under 15 Year Index-Linked Gilts Index Fund	0.09% p.a.
	LGIM Over 15 Year Index-Linked Gilts Index Fund	0.09% p.a.
	LGIM 5-15 Year Gilts Index Fund	0.09% p.a.
	LGIM Over 15 Year Gilts Index Fund	0.09% p.a.

The Annual Management Charge includes the Mobius Life Platform fee but excludes any additional expenses.

From 1 November 2023, Mobius Life have charged the Plan a policy administration fee ('PAF'). The PAF is a fee of £250 per calendar month, subject to annual inflationary increase, and is collected directly from the Plan's assets quarterly in arrears.

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