Chair of Trustees Governance Statement

MCB University Press Retirement & Death Benefit Scheme ('the Scheme')

The Occupational Pension Schemes (Scheme Administration) Regulations 1996 ("the Administration Regulations") require the Trustees to prepare an annual statement regarding governance, which should be included in the annual report.

This statement issued by the Trustees covers the period from 1 January 2018 to 31 December 2018 and is signed on behalf of the Corporate Trustees by the Chair.

This statement covers governance and charge disclosures in relation to the following:

1. The Default Arrangement,
2. Processing of core financial transactions,
3. Member borne charges and transaction costs,
4. Value for Members assessment, and
5. Trustee knowledge and understanding.

1. The Default Arrangement

The Corporate Trustee are responsible for investment governance, this includes the Corporate Trustee reviewing the default arrangement remains in the best interests of the members.

When the Scheme was originally established the Corporate Trustee took professional advice and selected a pension scheme where the With-Profits Fund was the only available investment fund option available to members. This was originally with Friends Life, who were acquired by Aviva Life & Pensions UK Limited (Aviva) in 2015, all policies, assets and liabilities of Friends Life were transferred and completed by 1 October 2017.

The fund is now called the Aviva Life & Pensions UK Limited With-Profits Sub-fund. There are two main types of With-Profit policies in the Sub-Fund, of which for this scheme, it is invested in the Conventional With-Profits fund.

Full details of the Aviva With-Profits Sub-Fund are recorded in the Aviva Principles and Practices of Financial Management (PPFM), which can be found on the following link: https://www.aviva.co.uk/adviser/documents/view/hl07002.pdf

In summary the key points to note in relation to the Conventional With-Profits Fund are as follows:

i. Aviva rate the With-Profits Sub-Fund as a low to medium volatility fund.
ii. Smoothing helps to reduce some of the significant ups and downs of investing in the stock market. The fund aims to smooth the rises and falls in value by holding back some of the investment returns in good years, these investment returns are then used to top up bonuses in poor investment years.
iii. Within the With-Profits Sub-Fund, it holds a greater proportion of higher risk assets, such as, shares (equities) and property (commercial). The fund also invests in gilts (loans to the UK Government), corporate bonds (loans to companies) and cash/money market.
iv. Aviva may add regular bonuses, if any, once a year to the guaranteed amount. Conventional With-Profits policies can receive two types of regular bonus, which are added on top of the initial guaranteed amount. This is calculated as:
    - A proportion of the initial guaranteed amount; and
    - A proportion of any bonuses Aviva have added previously.

v. Once the above regular bonus has been added, Aviva guarantee that the regular bonus will be paid at the policyholders chosen retirement date, the policy's maturity date or on death.

The Corporate Trustee consider the Conventional With-Profits Fund to be appropriate for the Scheme based on the investment strategy review which has been undertaken by the Corporate Trustee advisers, Aon Consulting Limited (Aon). However, there are no alternative investment strategies that the Corporate Trustee could utilise. The main concern is that there is no 'de-risking' element; however, as the Conventional With-Profit Fund uses a 'smoothing' feature the risk profile remains appropriate for the membership profile, as the majority of members have guaranteed annuity rates and also the fund has an underlying guarantee of 3% annually.

The latest Statement of Investment Principles (SIP) which governs decisions about the default arrangement is included in the appendix of this statement. This is based on data as at 31 December 2018. The Trustees must review the default arrangement again within the next three years.

2. Processing of Core Financial Transactions

The Corporate Trustee has a duty to ensure that core financial transactions are processed promptly and accurately. The law specifies that these include the following:

- Investment of contributions to the Scheme;
- Transfer of member assets into and out of the Scheme;
- Payments from the Scheme to, or in respect of, members/beneficiaries; and
- Transfers between different investments within the Scheme

The Corporate Trustee must ensure that these important financial transactions are processed promptly and accurately. In practice the Corporate Trustees delegate responsibility for this to the Scheme administrator, Aviva. The Scheme renewal is 1 January, where both salary and contributions are updated by the Corporate Trustee Limited with Aviva. The Scheme is set up on a Level Direct Debit which means that the monthly payment is automatically collected on the 1st of each month.

The Scheme administrator, Aviva will provide annual audit information on request from the Corporate Trustee. Aviva have confirmed for the Scheme year all contributions were correct and invested on the date of receipt.

Aviva have stated that they do not have any specific timescales for resolving or processing member requests, as they deal with each enquiry on an individual basis. However, Aviva have stated that they endeavour to provide members with accurate information promptly and in full.

There are no material administration service issues or complaints received in the last Scheme year, which need to be reported here by the Corporate Trustee. The Corporate Trustee is confident that the processes and controls in place with the administrator are robust and will ensure that the financial transactions are dealt with properly.

Based on the above, the Corporate Trustee consider that the requirements for processing core financial transactions have been met.

3. Member Borne Charges and Transaction costs

The Corporate Trustee monitors the level of charges borne by members through the Conventional With-Profits Fund. The charges comprise of:

- explicit charges, such as an Annual Management Charge (AMC) and additional expenses that are disclosed by the fund managers as part of the Total Expense Ratio (TER);

- transaction costs borne with the fund for activities such as buying and selling of particular securities within the fund's portfolio.

Aviva have confirmed that the following charges apply to the Scheme:

- 0.55% Fund Administration Cost
- 0.039% Total Transaction Cost (This is the total of the 'Buying and Selling' costs and 'Lending and Borrowing' costs*)

*Where it is an internal fund, which is a fund managed to an investment mandate set by Aviva UK Insurance, these are the costs incurred in buying and selling units in the Aviva insured fund and the costs incurred by this fund in buying and selling its holdings. Where the Aviva insured fund invests in an external fund these are the annual costs incurred in buying and selling units in the underlying external fund and the annual costs incurred by the underlying fund in buying and selling its holdings.

From 6 April 2018, the Corporate Trustee is also required to produce an illustration of the cumulative effect of the costs and charges on members' retirement fund values.

Illustrations – Impact of charges:

Aviva were unable to provide example illustrations for both active and deferred members, therefore our Advisers, Aon have produced the following illustrations. The below sets out transactional costs and charges which apply to selected funds together with illustrative examples of the cumulative effect of these costs and charges incurred by members.

Active Membership – Impact of Charges Illustration only:

Projected pension pots are in today's money:

Strawman 1: Average Active

Age	Estimated fund value (before charges) £	Estimated fund value (after charges) £	Effect of charges £
65	£255,960	£251,740	£4,220

Strawman 1: Youngest Active

Age	Estimated fund value (before charges) £	Estimated fund value (after charges) £	Effect of charges £
60	£289,900	£288,262	£1,638
65	£329,250	£318,708	£10,542

Notes

1. Projected pension pot value are shown in today's terms and do not need to be reduced further for the effect of future inflation
2. Retirement is assumed to be at age 65
3. The starting pot size is assumed to be £234,736 for an average member and £282,519 for the youngest member.
4. Inflation is assumed to be 2.5% each year
5. The starting gross contribution is assumed to be 15% per month for active members. Gross contributions are assumed to be paid from the start of the projection period until retirement
6. The projected growth rate for the Conventional With-Profits Fund is 3.3% per annum

Deferred Membership – Impact of Charges Illustration only:

Projected pension pot are in today's money:

Strawman 1: Average Deferred

Age	Estimated fund value (before charges) £	Estimated fund value (after charges) £	Effect of charges £
55	£35,240	£35,240	£0.00
60	£36,637	£35,604	£1,033
65	£38,089	£35,972	£2,117

Strawman 1: Youngest Deferred

Age	Estimated fund value (before charges) £	Estimated fund value (after charges) £	Effect of charges £
50	£8,189	£8,050	£139
55	£8,298	£7,962	£336
60	£8,627	£8,045	£582
65	£8,969	£8,128	£841

Notes

1. Projected pension pot value are shown in today's terms and do not need to be reduced further for the effect of future inflation
2. Retirement is assumed to be at age 65
3. The starting pot size is assumed to be £35,240 for an average deferred member and £8,000 for the youngest deferred member
4. Inflation is assumed to be 2.5% each year
5. No contributions are assumed
6. The projected growth rate for the Conventional With-Profits Fund is 3.3% per annum

4. Value for Members assessment

When assessing the charges and transaction costs which are payable by members, the Corporate Trustee is required to consider the extent to which the investment options and the benefits offered by the Scheme represent good Value for Members.

There is no legal definition of 'good value' and so the process of determining good value for members is a subjective one. We have received advice on how to assess good value from our advisers and considered regulatory guidance.

Together with its advisers Aon, the Corporate Trustee has established an assessment framework in order to assess the benefits of membership of the Scheme. The framework considers the following areas, where benefits can be financial or non-financial in nature:

Member communications

A review of member data has been carried out by the Corporate Trustee to ensure that the Corporate Trustee holds as accurate member data as possible.

- The Scheme administrators Aviva, provide effective communications that are accurate, clear, informative and timely.
- The main communication is the annual statement provided to members.
- Members have access to Aon Retirement Service online tools and helpful information around retirement planning, including all the Pension Freedoms by contacting Aon or registering on: https://www.aonannuityfinder.co.uk
- Members have access to Aviva's retirement planner, including all the Pension Freedoms: https://www.aviva.co.uk/retirement/tools/my-retirement-planner/
- Members can access help to support them in their decision making by contacting Pension Wise: https://www.pensionwise.gov.uk

Investments

The Conventional With-Profits Fund is the only available investment option available to members. However, the risk profile remains appropriate for the members in light of the overall objective of this fund.

- The Conventional With-Profits Fund differs from a unit linked policy in that it is not totally reliant on the current value of the underlying assets. This type of fund offers an underlying guarantee that provides a cushion against falling investment markets in certain circumstances.

- The underlying guarantee is 3% annually applied to the members accumulated fund.

- Aviva are currently paying an annual bonus of 1.5%; however, future bonuses cannot be guaranteed.

- As a result of demutualisation an additional value, known as the demutualisation terminal bonus (DTB) was added to members benefits, there is a guaranteed value of the DTB at normal retirement date or on death. The value of the DTB increases in line with a separate rate of regular bonus Aviva declare, which can go up or down at any time, this year the rate was 3%. Aviva may also add a final bonus to the DTB, which depends on the DTB final bonus rates applying at that time.

- Guaranteed Annuity Rates (GAR) apply for members contributions prior to 6 April 1997 for a male or female aged 65. For contributions after the 6 April 1997 Aviva's current annuity rates would apply, therefore no GAR after this date. If benefits are taken at any other time than the members normal retirement date, the rate of the GAR would be different. For deferred members the rate of the GAR would also be different. The GAR is based on a single life, level pension guaranteed for five years, payable monthly in advance. The GAR would be lost if a member transferred to another pension provider.

- Tax-Free cash entitlement – if a member joined the scheme prior to 6 April 2006, the member may be entitled to take a higher tax-free cash sum. If a member would like to check their entitlement they can request a A-Day lump sum form from the Corporate Trustee or Aon.

The Corporate Trustee will be reviewing the membership profile as part of the Scheme Review to ensure that this fund continues to be suitable for the membership.

Sound administration

- The Corporate Trustee has appointed Aviva to provide administration services to the Scheme and is satisfied that Aviva has sufficient checks in place to monitor and report on the standard of the administration service and to ensure that when administrative errors do occur, members are not disadvantaged as a result.
- This scheme is qualifying for auto enrolment.

Scheme governance

- Scheme governance covers the time spent by the Corporate Trustee to ensure the Scheme is run in compliance with the law and regulation, including taking account of the interests of its members.
- The Corporate Trustee believes that good governance is key to ensuing that a framework exists and is actively in use to help deliver better member outcomes. The Corporate Trustee review and updates its governance processes and procedures, at least annually, to make sure that these meet industry best standards.

A separate statement setting out the Value for Members assessment is available on request from the Corporate Trustee's advisers, Aon.

5. Trustees' Knowledge and Understanding

Sections 247 and 248 of the Pensions Act 2004 set out the requirement that the individuals which represent the Corporate Trustee 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 Code of Practice 7.

The Corporate Trustee have met the Pension Regulator's TKU requirements (as set out under Code of Practice No 7) during the Plan year through the following measures:

- The individuals who make up the Corporate Trustee are conversant with the Trust Deed and Rules and the Statement of Investment Principles for the Plan. The Corporate Trustee reverts to the legal advisor for any clarification, if required.
- The individuals who make up the Corporate Trustee have completed the Pension Regulator's trustee toolkit, including the modules relating to running a DC occupational arrangement.
- Assessing training needs and considering whether any gaps exist in the individual's knowledge and understanding.
- A training log is maintained for each individual who makes up the Corporate Trustee.
- In addition to the knowledge and understanding of the Corporate Trustee, the Corporate Trustee has engaged with their appointed professional advisers to ensure that they run the DC Section and exercise their functions properly, including the following:
    - Reviewing the default arrangement against its overall aim and objectives with advice from its adviser Aon;
    - Initiating a review of the Scheme to ensure the current Scheme remains appropriate in the long term for the membership.

Signed on behalf of the Corporate Trustee of the MCB University Press Retirement & Death Benefit Scheme.

Signed -- S Cox

Name SIMON COX ----------------------------------/Chair of Trustee

Date of signing 24.7.19

Appendix 1

MCB University Press Retirement & Death Benefits Scheme (the "Scheme") Statement of Investment Principles (the "Statement")

Scheme Details and Scope of Statement

This Statement has been prepared in accordance with section 35 of the Pensions Act 1995 (as amended by the Pensions Act 2004) and the Occupational Pension Schemes (Investment) Regulations 2005 (the "Investment Regulations").

The Scheme operates for the exclusive purpose of providing retirement benefits to eligible participants and beneficiaries ("Members"). The Scheme is a Defined Contribution ("DC") pension arrangement.

The Corporate Trustee investment responsibilities are governed by the Scheme's Trust Deed and the Statement takes full regard of its provisions. A copy of the Scheme's Trust Deed is available, upon request.

The effective date of this Statement is July 2019, which includes the latest investment fund information from Aviva dated 31 December 2018.

The Corporate Trustee will review this Statement at least every three years and after any significant change in investment policy, without delay.

Consultations Made

The Corporate Trustee are responsible for the investment options made available to members of the Scheme. When the Scheme was originally established the Corporate Trustee took professional advice and selected a pension scheme where the Conventional With-Profits Fund was the only investment fund option available to members.

Therefore, the Corporate Trustee are unable to make investment decisions or change the investment funds, as the Aviva With-Profits Sub-Fund is the only investment fund available to the Scheme.

The Corporate Trustee are also responsible for the preparation of this Statement. The Corporate Trustee have asked their current financial adviser, Aon Consulting Limited (Aon), who are authorised and regulated by the Financial Conduct Authority, to draft this Statement on behalf of the Corporate Trustee.

The Corporate Trustee consults with the employer and takes into consideration, where appropriate, the employers comments.

The Corporate Trustee has established the following structure:

Corporate Trustee:

- Sets structures and processes for carrying out their role;
- Define and monitor investment strategy and structure;

Aon:

- Advises on all aspects of the investment of the Scheme assets, where required;
- Advises on this Statement;

Aviva, the scheme provider:

- Operates with the terms of this Statement and the written contract;
- Provides information in respect of transactions in units in the underlying funds and valuations of the units.

Investment Principles

Corporate Trustees' aims and objectives for investment options

As mentioned earlier, when the Scheme was originally established the Corporate Trustee took professional advice and selected a pension scheme where the Conventional With-Profits Fund was the only available investment fund option available to members.

The key aim is to ensure that this fund remains suitable for meeting both members' long and short-term investment objectives. The Corporate Trustee must take into account members' circumstances, in particular the range of members' attitudes to risk and term to retirement.

The Corporate Trustee have reviewed the appropriateness of the Aviva With-Profits Sub-Fund; though, the Corporate Trustee are unable to make changes to the fund or select an alternative investment fund within the current Scheme.

Aviva have a With-Profits Committee which is a group of independent experts who help to look after the interests of the members. The committee meets about 8 times a year and works closely with Aviva's With-Profits Actuary and Chief Actuary and also have an independent actuarial adviser who provides extra expertise. The Committee have 5 key objectives, which are:

1. To challenge Aviva to show that Aviva's decisions are fair to all With-Profit members, particularly where one group is treated differently from another.
2. To check Aviva are doing what they said they would. This means keeping to Aviva's Principles and Practices of Financial Management (PPFM), the document which sets out Aviva's approach to managing With-Profits Funds.
3. To ensure Aviva are being fair to both new and existing With-Profits members and not favour one group over another.
4. To help make sure Aviva send clear and complete communications to With-Profits Members.
5. To require Aviva respond to any recommendations raised by the committee. If the committee think Aviva have not responded properly, the committee can inform the Financial Conduct Authority so they can follow this up.

The committee sends the minutes of its meetings to the Board. The Chair of the committee also attends four company board meetings each year to discuss the committee's work and any areas of concern or advice.

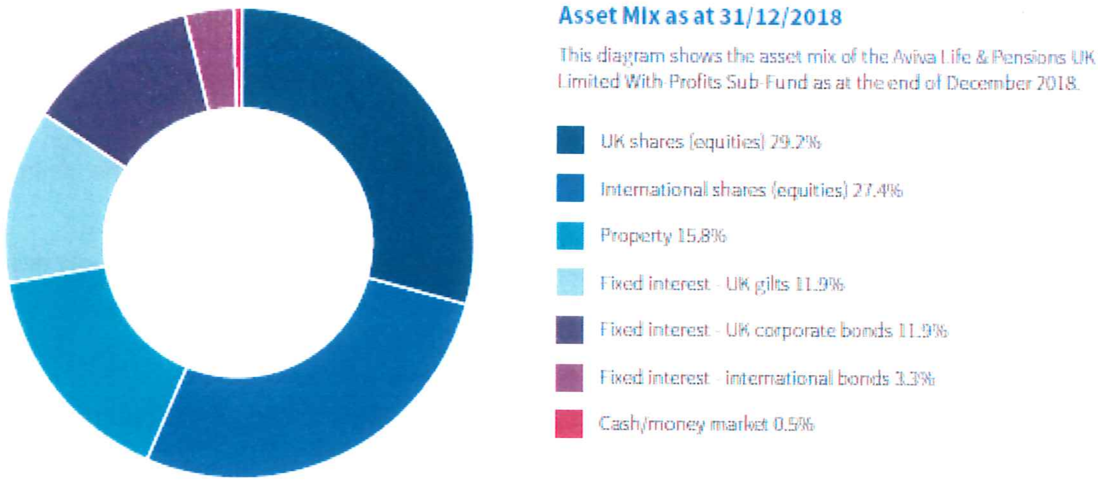
Aviva's PPFM is a document that sets out the principles and practices that Aviva follow when managing its With-Profits business. The PPFM for the Aviva With-Profits Sub-Fund has been approved by the Board of Directors of Aviva Life & Pensions UK Limited ('the Board'). The Board will report each year on whether the Aviva With-Profits Sub Fund has been managed in accordance with the PPFM. If Aviva propose to make any material changes to any principle in the PPFM they will inform members with a With-Profits policy in the Sub-Fund in writing at least three months in advance, unless they consider that advanced notice is not necessary and the FCA has agreed. The full PPFM can be found on: https://www.aviva.co.uk/adviser/documents/view/hl07002.pdf

With-Profits Sub-Fund

The Aviva With-Profits Sub-Fund is rated by Aviva as a low to medium volatility fund, there is no recommended term of investment, but Aviva state that members should be prepared to invest for at least 5 to 10 years.

Aviva With-Profits Sub-Fund invests in a broad range of assets and will always hold a mixture of higher or lower risk assets to achieve its objective. It holds a greater proportion of higher risk assets, such as shares (equities) and property (commercial). The remainder is in medium to lower risk investments, such as gilts (loans to UK Government), corporate bonds (loans to companies) and cash/money market.

The asset diagram below shows the type and percentage of each asset that the With-Profits Sub-Fund invests in:



Source: Aviva

The table below shows the mix of assets of the Sub-Fund in recent years:

	31.12.18 %	31.12.17 %	31.12.16 %	31.12.15 %	31.12.14 %
UK shares (equities)	29.2	27.0	22.2	26.9	33.5
International shares (equities)	27.4	35.5	29.6	23.9	17.7
Property	15.8	12.8	19.2	19.1	19.4
Fixed interest – UK gilts	11.9	9.1	10.0	6.2	3.0
Fixed interest – UK corporate bonds	11.9	12.7	15.6	15.4	14.5
Fixed interest – international bonds	3.3	2.5	2.5	3.0	4.2
Cash/money market	0.5	0.4	0.9	5.5	7.7
	100.0	100.0	100.0	100.0	100.0

Source: Aviva

Risk Management

Within the With-Profits Sub-Fund the value of the assets will rise or fall. Members of the scheme are invested in the Conventional With-Profits fund element of the With-Profits Sub-Fund. This means that Aviva aim to even out some of the rises and falls in performance, which is known as smoothing. Smoothing helps to reduce some of the significant ups and downs of investing in the stock market. The fund aims to smooth the rises and falls in value by holding back some of the investment returns in good years, these investment returns are then used to top up bonuses in poor investment years. There may be times in poor market conditions when smoothing can't fully protect members investments.

Under the Conventional With-Profits policies, bonuses are declared in two forms:

Regular Bonus

Aviva may add regular bonuses, if any, once a year to the guaranteed amount. Conventional With-Profits policies can receive two types of regular bonus, which are added on top of the initial guaranteed amount. This is calculated as:

- A proportion of the initial guaranteed amount; and
- A proportion of any bonuses Aviva have added previously.

Once the above regular bonus has been added, Aviva guarantee that the regular bonus will be paid at the policyholders chosen retirement date, the policy's maturity date or on death.

Final Bonus

The Final Bonus rates aim to pay the balance between the regular bonus already added and the performance of the Sub-Fund over the whole period of the member's investment. This should ensure that you get a fair share of the return the Sub-Fund has earned.

The Final Bonus is based on the year it which the member invested and the point in which the member leaves the Sub-Fund. It may vary depending on the returns earned over the lifetime of the member's investment and is not guaranteed.

This bonus would be normally be paid if the pension is transferred or the policy's maturity date or on death.

Guaranteed Amount

The Conventional With-Profits Fund provides a guaranteed amount (sometimes referred to as the 'sum assured') at maturity or on death.

Guaranteed Annuity Rates (GAR)

Some policies may have GARs, the GAR applies if benefits are taken in line with the terms of the individual's plan conditions. This usually means that the GAR available to members at normal retirement date will be more favourable than the rates members would get from another pension provider at retirement. The GAR would be lost if a member transferred to another pension provider.

Other area of risk

The other main areas of risk with this type of arrangement that the Corporate Trustee must consider are:

- **Volatility risk**– smoothing will not protect the Conventional With-Profits Fund fully from stock market steep or long-term falls in the value of investments. Aviva constantly monitor investment conditions and may change levels of final bonus at any time. Final bonuses can sometimes move up or down very significantly, even within a few months, in spite of smoothing.
- **Inflation risk** – the risk that the level of inflation over members' working lives reduces the real level of return on the member's' investment.
- **Manager risk** - the risk that the chosen investment manager underperforms the benchmark against which the investment manager is assessed. The Conventional With-Profits Fund has an underlying guaranteed of 3% per annum.
- **Unsuitability** – the risk of the Conventional With-Profits Fund being unsuitable for the requirements of some members. This is a concern to the Corporate Trustee as the Conventional With-Profits Fund is the only available fund choice.
- **Operational risk -** the risk of fraud, poor advice or acts of negligence. The Corporate Trustee have sought to minimise such risk by ensuring that all advisers and third-party service providers are suitably qualified and experienced.
- **Assets may not be readily realisable** – a member may want to take benefits at a time when a Market Value Reduction may be applied. This is a reduction that Aviva sometimes have to make so that members who remain invested in the Sub-Fund are not disadvantaged when other members choose to leave the fund. This could happen if a member wishes to access their pension funds prior to the retirement date chosen when the member policy was taken out.

Due to the complex and interrelated nature of these risks, the Corporate Trustee consider these risks in a qualitative rather than quantitative manner as part of each formal strategy review. The Corporate Trustee policy is to review the Conventional With-Profits Fund at least every three years. These risks are considered as part of each normal strategy review.

Choosing Investments

The Corporate Trustee do not believe that the investment options under the Scheme provide all members with a reasonable choice in pursuit of their individual investment objectives, as there is only one investment option available to the members. However, the Corporate Trustee believe that the Conventional With-Profits Fund does provide an investment option in the best interests of most members.

Policies contain potentially valuable guarantees which members should consider in the context of their transfer value and whether their investment remains appropriate.

Compliance

Section 36 of the Pensions Act 1995 requires that the Corporate Trustee will exercise their powers of investment in a manner which is consistent with their investment objectives. Under Section 36 regulation, the Corporate Trustee is required to invest the Scheme's assets in the best interests of the members and beneficiaries. The Corporate Trustee must also ensure that the Scheme's investments predominantly consist of assets traded on Regulated Markets, and that they be properly diversified in a prudent manner. The assets within the Aviva With-Profits Sub-Fund consist of assets traded on regulated markets and they are properly diversified.

The Trustees are unable to specify the asset allocation of the Aviva With-Profits Sub-Fund.

Investment manager structure

The Trustees appointed Aviva as the provider of administration services and the investment platform to the Scheme. Aviva allow their investment manager to use derivatives (such as a future, option or warrant) as part of an investment strategy to help manage risk or to aid efficient portfolio management. Aviva use a range of counterparties in order to limit exposure to any one counterparty.

Aviva manage the assets as separate asset pools by the investment manager. The target asset allocation of the pools is regularly reviewed by the investment managers, usually every three years or following a significant change to market conditions or the financial position of the Sub-Fund.

Manager monitoring

Whilst the Corporate Trustee is not involved in the investment managers' day to day method of operation and so cannot directly influence attainment of the performance target, they will assess performance and review appointments.

Fee Structure for Investment Manager

The investment manager is remunerated as a set percentage of the assets under management. This is in keeping with market practice. Annual investment management charges (including other annual charges levied by the investment manager and some administration charges) are met by the members by deduction from the unit price.

Environmental or Ethical Consideration

Unfortunately, the Corporate Trustee is unable to offer a range of funds aimed to address environmental and ethical considerations under the current Scheme as the only fund available under the Scheme is the Conventional With-Profits Fund.

Activism and the Exercise of the Rights Attaching to Investments (Social Responsibility)

The Corporate Trustee do not actively engage with investment managers in terms of exercising ownership rights on socially responsible issues.

The Trustees will review from time to time the investment managers' principles and how these have been applied in exercising these rights. Aviva have confirmed that when investing on behalf of members, they consider their primary objective is to achieve the best investment return while allowing for an acceptable level of risk. In pursuing this objective, they will consider a number of factors what will affect performance, including Socially Responsible Investment issues.

Signed on behalf of the Corporate Trustee

SIMON COX	[illegible]	24.7.19
Name (Print)	Signature	Date