

Radius Group Pension Scheme

Statement of Investment Principles

September 2019

Contents

Glossary.....	1
1. Introduction.....	2
2. Investment Governance Structure	3
3. Investment Beliefs	4
4. Investment Objectives and Strategy – DB Section.....	5
5. Investment Objectives and Strategy – DC Section.....	6
6. Use of Investment Managers.....	7
7. Stewardship.....	8
8. Risk Mitigation	9
9. Monitoring	10
10. Future Amendments.....	11
Appendix 1: The Trustees' Investment Strategy	12
Appendix 2: Fund Details – DB Section.....	14
Appendix 3: Fund Details – DC Section.....	17

Glossary

AVCs	Additional Voluntary Contributions
ESG	Environmental, Social and Governance (including, but not limited to, climate change)
LDI	Liability Driven Investments
LGIM	Legal and General Investment Management
Members	Members and beneficiaries of the Scheme
M&G	M&G Financial Services Limited
Scheme	Radius Group Pension Scheme
Trustees	The Trustees of the Scheme
UNPRI	United Nations Principles for Responsible Investment

1. Introduction

This statement is made in accordance with the requirements of legislation¹ and, in determining a suitable investment strategy for the Scheme, the Trustees have considered the Pension Regulator's Investment Guidance for defined benefit pension schemes.

The main body of this statement sets out the principles and policies that govern investments made by the Trustees of the Scheme. Details of the specific investment arrangements in place are set out in the Appendices.

Upon request, a copy of this statement will be made available to members, the Scheme Actuary and any investment managers used by the Trustees.

¹ In particular, the Pensions Act 1995, the Occupational Pensions (Investment) Regulations 2005 and the Pension Protection Fund (Pensionable Service) and Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018.

2. Investment Governance Structure

Investment Advice

As required by legislation, in the preparation and maintenance of this statement and when considering the suitability of any investments, the Trustees will obtain and consider written advice from their investment adviser which is First Actuarial LLP.

The investment adviser is regulated by the Institute and Faculty of Actuaries and is qualified to provide the required advice through knowledge and practical experience of financial matters relating to pension schemes.

The investment adviser provides agreed services on a fixed fee basis, with additional projects provided on a time cost basis.

Legal Advice

Whenever deemed necessary, the Trustees will seek advice from their legal adviser on investment matters.

Employer Consultation

Under legislation, the ultimate responsibility for determining the investment strategy rests with the Trustees. However, the Trustees must consult with the sponsoring employer and consultation must comprise a sharing of views, not simply notification of intent.

Investment Managers

Day-to-day management of the Scheme's assets is delegated to one or more investment managers.

To ensure safekeeping of the assets, ownership and day to day control of the assets is undertaken by custodian organisations which are independent of the sponsoring employer and the investment managers. Where pooled investment vehicles are used, the custodians will typically be appointed by the investment manager.

Members' Views and Other Non-Financial Matters

In the relevant regulations "non-financial matters" refers to the views of the members. This includes, but is not limited to, ethical views, views on ESG factors and views on the present and future quality of life of the members.

The Trustees recognise that it is likely that members will hold a broad range of views. However, the Trustees do not take non-financial matters into account in the selection, retention and realisation of investments. The Trustees will review their policy on whether or not to take account of non-financial matters as appropriate.

The Trustees believe that their duty to members will be best served by ensuring that all benefits can be paid as they fall due and the Trustees' Investment Objectives are designed to ensure this duty is achieved.

Conflicts of Interest

The Trustees are satisfied that the investment strategy described in this Statement meets their responsibility to invest the assets in the best interests of the members and, in the case of a potential conflict of interest, in the sole interest of the members.

3. Investment Beliefs

The investment beliefs stated below have been developed by the Trustees and are reflected in the Scheme's investment strategy.

Appropriate Time Horizon

In determining investment objectives and a suitable investment strategy for the Scheme, the Trustees take into account an appropriate time horizon. The Trustees believe that an appropriate time horizon will be the period over which benefits are expected to be paid from the Scheme.

Risk versus Reward

Targeting higher levels of investment return requires increased levels of investment risk which increases the volatility of the funding position.

Asset Allocation

Long-term performance of the Scheme's assets is attributable primarily to the strategic asset allocation rather than the choice of investment managers.

Diversification

Asset diversification helps to reduce risk.

Use of Pooled Funds

Taking into account the size of the Scheme's assets, it is expected that pooled funds will typically be a more practical way of implementing the Scheme's investment strategy than establishing segregated mandates with investment managers.

Use of Active Management

Active management has the potential to add value either through offering the prospect of enhanced returns or through the control of volatility. In addition, it is recognised that active management may help to mitigate the financial impact of ESG risks.

For each asset class, the Trustees will consider whether the higher fees associated with active management are justified.

ESG and Other Financially Material Considerations

The Trustees believe that financially material considerations, including ESG factors and the risks related to such factors, can contribute to the identification of both investment opportunities and financially material risks. Consequently, financially material considerations can have a material impact on investment risk and return outcomes.

The Trustees also recognise that long-term sustainability issues, particularly climate change, present risks and opportunities that increasingly may require explicit consideration.

Assessment of how ESG risks are mitigated will be one of the factors considered by the Trustees when selecting and monitoring investment managers.

Stewardship

The Trustees believe that good stewardship can help create, and preserve, value for companies and markets as a whole.

4. Investment Objectives and Strategy – DB Section

Defined Benefit Assets – Investment Objectives

The Trustees' primary investment objectives are:

- to ensure that the assets are sufficient and available to pay members' benefits as and when they fall due;
- to generate an appropriate level of investment returns – to improve the funding position and thereby improve security for members; and
- to protect the funding position – limiting the scope for adverse investment experience reducing security for members.

The Trustees' investment approach is designed to strike a balance between the above primary objectives but also considers:

- the nature and timing of benefit payments;
- expected levels of investment return on different asset classes;
- expected levels of investment return variability and, specifically, the expected level of short-term volatility of the funding position;
- the sponsoring employer's ability to withstand additional contribution requirements that may arise from volatility in the funding position; and
- the full range of available investments (within the bounds of practicality).

Defined Benefit Assets – Investment Strategy

The Trustees have taken advice from their investment adviser to construct a portfolio of investments consistent with these objectives. In doing so, consideration is given to all matters which are believed to be financially material over the appropriate time horizon.

The Trustees do not take account of non-financial matters when determining the Scheme's investment strategy.

AVCs

AVCs are held separately from the Scheme's other investments and the AVCs are used to secure benefits on a money purchase basis for members at retirement. From time to time the Trustees review the ongoing suitability of the AVC arrangements.

Details of the current AVC arrangements are provided in Appendix 1.

5. Investment Objectives and Strategy – DC Section

In determining their investment objectives, the Trustees consider the investment requirements of the membership.

It is expected that the investment strategy for an individual member is likely to change over time:

- For younger members the investment priority is likely to be to achieve long-term investment growth.
- As retirement approaches, members are likely to look to reduce investment risk. The way such risk can be controlled will vary depending on whether the member intends to take benefits as an annuity, as cash, or via an income drawdown product.

Investment Objectives – DC Section

The Trustees set an investment strategy that offers an appropriate range of investment options. The range of funds that is offered is intended to offer sufficient investment flexibility for members of all ages.

The range of funds selected by the Trustees are detailed in Appendix 3.

6. Use of Investment Managers

Investment Manager Selection

The Trustees delegate the day to day management of the assets, including selection, retention and realisation, to professional investment managers.

When considering the suitability of an investment manager, the Trustees (in conjunction with their investment adviser), will take account of all matters which are deemed to be financially material. In particular, the Trustees will:

- ensure that the investment manager has the appropriate knowledge and experience;
- ensure that the investment manager's mandate is appropriate; and
- consider the investment manager's approach to ESG factors.

When selecting investment managers, the Trustees may also take into account non-financially material considerations such as the investment manager's administrative capabilities and the liquidity of the investments.

Where pooled investment vehicles are used, it is recognised that the mandate cannot be tailored to the Trustees' particular requirements. However, the Trustees ensure that any pooled investment vehicles used are appropriate to the circumstances of the Scheme.

The Trustees will normally select investment managers who are signatories to the UNPRI and who publish the results of their annual UNPRI assessment. This principle may be waived if a fund offered by a non-signatory manager is deemed to have investment characteristics which are particularly important for meeting the Trustees' investment objectives.

Manager Implementation

Assets are invested predominantly on regulated markets, as so defined in legislation. Any investments that do not trade on regulated markets are kept to a prudent level.

Use of Derivatives

The investment managers are permitted to use derivative instruments to reduce risk or for efficient portfolio management. Risk reduction would include mitigating the impact of a potential fall in markets or the implementation of currency hedging whilst efficient portfolio management would include using derivatives as a cost-effective way of gaining access to a market or as a method for generating capital and/or income with an acceptable level of risk.

Leverage

The instruments used by the investment managers of the Liability Matching Assets may result in the Liability Matching Assets being leveraged. Since these assets are closely aligned to the liabilities, the allocation to Liability Matching Assets (and any associated leverage) reduces the volatility of the Scheme's funding position and therefore reduces risk.

7. Stewardship

The Trustees' policy in relation to the exercise of rights attaching to investments, and undertaking engagement activities in respect of investments, is that they wish to encourage best practice in terms of stewardship.

However, the Trustees invest in pooled investment vehicles and therefore accept that ongoing engagement with the underlying companies (including the exercise of voting rights) will be determined by each investment manager's own policies on such matters. For that reason, the Trustees recognise that their ability to directly influence the action of companies is limited.

Nevertheless, the Trustees expect that each investment manager will discharge its responsibilities in respect of investee companies in accordance with that investment manager's own corporate governance policies and current best practice, including the UK Corporate Governance Code and UK Stewardship Code.

The Trustees also expect that each investment manager will take ESG factors into account when exercising the rights attaching to investments and in taking decisions relating to the selection, retention and realisation of investments.

When considering the suitability of an investment manager, the Trustees (in conjunction with their investment adviser) will take account of any particular characteristics of that manager's stewardship policy that are deemed to be financially material.

The Trustees recognise that members might wish the Trustees to engage with the underlying companies in which the Scheme invests with the objective of improving corporate behaviour to benefit the environment and society. However, the Trustees' priority is to select investment managers which are best suited to help meet the Trustees' investment objectives. In making this assessment, the Trustees will receive advice from their investment adviser. The Trustees recognise that each investment manager's own policies are likely to be focussed on maximising financial returns and minimising financial risks rather than targeting an environmental or societal benefit.

8. Risk Mitigation

When determining suitable investment objectives and when designing the Scheme's investment strategy, the Trustees (in conjunction with their investment adviser), will take into account all risks that are assessed to be financially material. The principal investment risks are listed in the Trustees' Report and Accounts. That document also provides an explanation of how the investment risks are managed.

Risk Capacity and Risk Appetite

In determining a suitable investment strategy, the Trustees consider how the volatility of the funding position is likely to be affected by changes to the asset allocation. An important consideration for the Trustees is whether a potential investment strategy is consistent with the ability of the sponsoring employer to address any future increase in deficit that may arise due to market movements.

Self-Investment Risk

Legislation imposes a restriction that no more than 5% of a pension scheme's assets may be related to the sponsoring employer. The Trustees do not hold any direct employer-related assets and any indirect exposure is expected to be less than 5% of total assets.

ESG Risks

The Trustees (in conjunction with their investment adviser) have considered the likely impact of the financially material ESG risks associated with all of the Scheme's investments and have assessed the mitigation of such risks implemented by each of the investment managers. In making this assessment, the Trustees recognise that, where pooled investment vehicles are held, the extent to which ESG factors will be used in the selection of suitable underlying investments will be determined by the investment managers' own policies on such matters.

Liquidity Risk

The majority of the Scheme's investments will be liquid and will be realisable for cash at relatively short notice without incurring high costs. However, the Trustees recognise that the liabilities are long-term in nature and that a modest allocation to less-liquid investments may be appropriate.

Details of the liquidity characteristics of the funds held are provided in Appendix 2.

9. Monitoring

The Trustees regularly review the Scheme's investments for all matters considered to be financially material over the appropriate time horizon. This includes reviewing that the assets continue to be managed in accordance with each investment manager's mandate and that the choice of investment managers remains appropriate.

Furthermore, the Trustees regularly monitor the position of the investment managers with regards to ESG matters.

10. Future Amendments

This statement will be reviewed at least every three years and without delay after any significant change in circumstances or investment strategy.

The Trustees have consulted with the sponsoring employer as part of the work preparing this statement.

Signed: *DASpicer*

Date: *27/9/2019*

For and on behalf of the Trustees of the Radius Group Pension Scheme.

Appendix 1: The Trustees' Investment Strategy

Strategic Asset Allocation

In determining the strategic asset allocation, the Trustees view the investments as falling into two broad categories:

1. **Growth Assets** – Assets that are expected to deliver long-term returns in excess of liability growth. The use of Growth Assets is expected to deliver a level of investment returns deemed appropriate by the Trustees given the risk involved.
2. **Liability Matching Assets** – Assets that are expected to react to changes in market conditions in a similar way to the liabilities. The use of Liability Matching Assets is expected to protect the funding position of the Scheme.

The strategic split of the Scheme's assets between Growth and Liability Matching Assets is 70% Growth and 30% Liability Matching. However, this split is not regularly rebalanced and will vary over time as market conditions change.

The Trustees will review the strategic asset allocation periodically, and at least every three years, to ensure that the investment strategy remains consistent with the Trustees' funding objectives. As part of such a review, the Trustees will consider the risks associated with the investment strategy.

Investment Strategy Implementation

The Trustees have selected funds managed by LGIM and M&G to implement the Scheme's investment strategy. Investments are made via the LGIM investment platform.

Further details of the investment strategy and the funds used are provided below.

Design of the Growth Asset Portfolio

The structure of the Scheme's Growth Assets has been designed to offer diversification across a range of underlying asset classes and to achieve this by combining investment managers with different asset management styles.

The strategic allocation for the Scheme's Growth Assets is as follows:

Pooled Fund	Strategic Allocation of the Growth Assets
LGIM Global Equity (70:30) Index Fund	38%
M&G Total Return Credit Investment Fund	21%
LGIM Diversified Fund	41%
Total Growth Assets	100%

The allocation between the above funds is not rebalanced and, therefore, the distribution of the Growth Assets will evolve over time as market conditions change.

Appendix 1: The Trustees' Investment Strategy (continued)

Design of the Liability Matching Portfolio

The Scheme's Liability Matching Assets are invested in leveraged LDI funds managed by LGIM. The LGIM funds used are:

- LGIM Matching Core Fixed Short Fund
- LGIM Matching Core Real Short Fund

The Liability Matching Portfolio has been designed to hedge approximately 95% of the sensitivity of the liabilities to changes in long term interest rates and inflation expectations.

The allocation of the Liability Matching Portfolio will be reviewed periodically to ensure that it continues to provide an effective hedge for the liabilities. As a minimum, such reviews will take place after each valuation.

LDI Leverage Management Policy

As gilt yields and expectations of future inflation fluctuate, the leverage of the LDI fund will change. The LDI fund manager will monitor the leverage of the fund to ensure it remains within a permissible range and, if the leverage moves towards either extreme of the range, the manager may:

- require a recapitalisation payment be paid into the LDI fund to reduce leverage; or
- make a releveraging payment out of the LDI fund to increase leverage.

The Trustees have agreed that any LDI recapitalisation payments will be taken 50% from the M&G Total Return Credit Investment Fund and 50% from the LGIM Diversified Fund.

The Trustees have agreed to invest the proceeds of any releveraging payments 50% into the M&G Total Return Credit Investment Fund and 50% into the LGIM Diversified Fund.

Cashflow Policy

Any investments or disinvestments are made at the discretion of the Trustees, but it is expected that these will normally be paid into, or taken from, the Growth Assets.

The Liability Matching Assets are held to match the liabilities rather than be a specified proportion of the total assets. As such, routine investments or disinvestments will not normally be paid into, or taken from, the Liability Matching Assets. Instead, investments and disinvestments will normally be used to move the allocation of the Growth Assets closer to the Strategic Growth Allocation shown in the table above.

Additional Voluntary Contributions

The Scheme's AVC arrangements are held with Legal & General Investment Management and Aviva.

Appendix 2: Fund Details – DB Section

This Appendix provides a summary of the funds selected by the Trustees to implement the Scheme's investment strategy for the DB section. The details provided below were correct as at September 2019.

The following points should be noted:

- **AMC:** The Annual Management Charge applicable to each fund represents the fee payable to the fund manager.
- **Additional expenses:** These are third party costs associated with the operation of a fund such as fees paid to the administrator, the custodian and the auditor and the costs associated with the use of third-party funds where these are used. The level of the additional expenses may vary over time.
- **Legal Structure:** Funds may have different legal structures.
- **T:** The Trade date at which units in a fund are sold or bought. Notice and settlement periods are expressed in days relative to the trade date.

LGIM Global Equity (70:30) Index Fund	
Objective	The LGIM Global Equity (70:30) Index Fund employs an index-tracking strategy aiming to replicate the performance of its benchmark. The benchmark return is calculated as the weighted average of global equity indices with the weightings being 70% UK (FTSE All-Share Index) and 30% overseas (FTSE All-World (ex-UK) Index).
Legal Structure	Unit-linked insurance policy
Trading Frequency	Weekly
Notice Period	T-2
Settlement Period	T+3
Fee	AMC: Up to 0.16% per annum
	Additional Expenses (approx.): 0.00% per annum

Appendix 2: Fund Details – DB Section (continued)

M&G Total Return Credit Investment Fund	
Objective	The fund aims to provide investors with attractive returns from capital and income from a diversified pool of debt and debt like assets, including but not limited to, debt instruments with a fixed, variable or floating rate coupon.
Legal Structure	Unit-linked insurance policy
Trading Frequency	Daily
Notice Period	T-2
Settlement Period	T+2
Fee	AMC: 0.48% per annum*
	Additional Expenses (approx.): 0.00% per annum

**Includes fee of 0.03% pa for accessing the fund via the LGIM platform*

LGIM Diversified Fund	
Objective	To provide long-term investment growth through exposure to a diversified range of asset classes. The long-term rate of return is expected to be broadly similar to that of a developed market equity fund.
Legal Structure	Unit-linked insurance policy
Trading Frequency	Weekly
Notice Period	T-2
Settlement Period	T+3
Fee	AMC: Up to 0.30% per annum
	Additional Expenses (approx.): 0.01% per annum

Appendix 2: Fund Details – DB Section (continued)

LGIM Matching Core Funds	
Objective	To provide liability hedging based on the liability cashflows of a typical UK pension scheme.
Legal Structure	Unit-linked insurance policy
Trading Frequency	Weekly
Notice Period	T-2
Settlement Period	T+3
Fee	AMC: Up to 0.24% per annum
	Additional Expenses (approx.): 0.05% per annum

Appendix 3: Fund Details – DC Section

This Appendix provides a summary of the funds selected by the Trustees to implement the Scheme's investment strategy for the DC section. The details provided below were correct as at September 2019.

The following points should be noted:

- **AMC:** The Annual Management Charge applicable to each fund represents the fee payable to the fund manager.
- **Additional expenses:** These are third party costs associated with the operation of a fund such as fees paid to the administrator, the custodian and the auditor and the costs associated with the use of third-party funds where these are used. The level of the additional expenses may vary over time.
- **Legal Structure:** Funds may have different legal structures.
- **T:** The Trade date at which units in a fund are sold or bought. Notice and settlement periods are expressed in days relative to the trade date.

LGIM Global Equity (70:30) Index Fund (Charges Included)	
Objective	The LGIM Global Equity (70:30) Index Fund employs an index-tracking strategy aiming to replicate the performance of its benchmark. The benchmark return is calculated as the weighted average of global equity indices with the weightings being 70% UK (FTSE All-Share Index) and 30% overseas (FTSE All-World (ex-UK) Index).
Legal Structure	Unit-linked insurance policy
Trading Frequency	Daily
Notice Period	T-2
Settlement Period	T+2
Fee	AMC: 0.16% per annum
	Additional Expenses (approx.): 0.00% per annum

Appendix 3: Fund Details – DC Section (continued)

LGIM AAA-AA-A Corporate Bond Over 15 Year Index Fund (Charges Included)	
Objective	The LGIM AAA-AA-A Corporate Bond Over 15 Year Index Fund employs an index-tracking strategy aiming to replicate the performance of the Markit iBoxx £ Non-Gilts (ex-BBB) Over 15 Year Index to within +/-0.5% p.a. for two years out of three.
Legal Structure	Unit-linked insurance policy
Trading Frequency	Daily
Notice Period	T-2
Settlement Period	T+2
Fee	AMC: 0.15% per annum
	Additional Expenses (approx.): 0.00% per annum

LGIM Cash Fund (Charges Included)	
Objective	The LGIM Cash Fund holds sterling deposits with a range of high quality financial institutions and may also hold certificates of deposit, commercial paper, UK Treasury Bills or other short dated debt issued by the Government or other public sector bodies. The fund aims to provide capital preservation with the objective of delivering returns in line with 7 Day LIBID, without incurring excessive risk.
Legal Structure	Unit-linked insurance policy
Trading Frequency	Daily
Notice Period	T-2
Settlement Period	T+2
Fee	AMC: 0.125% per annum
	Additional Expenses (approx.): 0.00% per annum