

EFFECTIVE FROM 6 NOVEMBER 2023

## 1. INTRODUCTION

This Statement of Investment Principles ("SIP") has been produced by the Trustees of the Marylebone Cricket Club Pension & Assurance Scheme ("the Scheme").

It sets out our policies on various matters governing investment decisions for the Scheme, which is a Defined Benefit ("DB") Scheme.

This SIP replaces the previous SIP dated 25 September 2023.

This SIP has been prepared after obtaining and considering written advice from LCP, our investment adviser, whom we believe to be suitably qualified and experienced to provide such advice. The advice considered the suitability of investments including the need for diversification given the circumstances of the Scheme and the principles contained in this SIP.

We have consulted with the relevant employer, the Marylebone Cricket Club (the "Club"), in producing this SIP.

We will review this SIP from time to time and will amend it as appropriate. Reviews will take place without delay after any significant change in investment policy and at least once every three years.

This SIP contains the information required by legislation, and also considers the Pension Regulator's guidance on investments.

We have produced a separate SIP addendum document, which details further background and other matters relevant to the Scheme's investments, but which are not required to be included in the SIP.

## 2. INVESTMENT OBJECTIVES

The primary objective for the Scheme is to ensure that the Scheme should be able to meet benefits payments as they fall due. In addition to this primary objective, we have the following objectives:

- That the Scheme should be fully funded on a technical provisions basis (ie the asset value should be at least that of its liabilities on this basis). We are aware that there are various measures of funding, and have given due weight to those considered most relevant to the Scheme.
- That the expected return on the Scheme's assets is maximised whilst managing and maintaining investment risk at an appropriate level.

Our investment objective for the AVCs is to make available a suitable range of investment options to meet members' risk / return objectives.

### 3. INVESTMENT STRATEGY

With input from our advisers and in consultation with the employer, we reviewed the investment strategy in August 2023, considering the objectives described in Section 1, above.

The investment strategy is based on the allocation below.

ASSET CLASS	STRATEGIC ALLOCATION
<b>Total growth</b>	<b>25%</b>
Global equities	5%
Secure Income	10%
DGF	10%
<b>Total matching</b>	<b>75%</b>
Corporate bonds	25%
Fixed / Index-linked gilts	50%
<b>Total</b>	<b>100%</b>

Our policy is to target the maximum expected return level subject to ensuring the level of investment risk is appropriate to reflect the Scheme's circumstances. We believe that the strategy above meets this objective.

We have agreed a formal rebalancing policy that is automatically monitored and implemented by the appointed investment managers. Further details are set out in part 3 of the separate SIP addendum.

We also monitor the asset allocation from time to time. If material deviations from the strategic allocation occur, we will consider with our advisers whether it is appropriate to rebalance the assets, taking into account factors such as market conditions and anticipated future cash flows.

### 4. CONSIDERATIONS IN SETTING THE INVESTMENT ARRANGEMENTS

When deciding how to invest the Scheme's assets, it is our policy to consider a range of asset classes, taking account of the expected returns and risks associated with those asset classes, as well as our beliefs about investment markets and which factors are most likely to impact investment outcomes.

We take an integrated approach when assessing risk and reviewing the investment strategy. In particular we take account of: the employer covenant, contributions, funding targets, liability profile (including interest rate and inflation sensitivities and the extent to which they are hedged) and the level of expected return and risk now and as the strategy evolves.

## 4. CONSIDERATIONS IN SETTING THE INVESTMENT ARRANGEMENTS CONTINUED

The primary ways that we manage investment risk is via diversification, ensuring we receive professional written advice prior to making any material investment decision, and our ongoing monitoring and oversight of the investments. Further details of specific risks (for example equity risk, credit risk and currency risk) and how we measure and manage those risks is set out in Part 2 of the SIP addendum.

In setting the strategy it is our policy to consider:

- the Scheme's investment objectives, including the target return required to meet our investment objectives
- the best interests of all members and beneficiaries
- the circumstances of the Scheme, including the profile of the benefit cash flows (and the ability to meet these in the near to medium term), the funding level, and the strength of the Club's covenant
- the risks, rewards and suitability of a number of possible asset classes and investment strategies and whether the return expected for taking any given investment risk is considered sufficient given the risk being taken
- the need for appropriate diversification between different asset classes to ensure that both the Scheme's overall level of investment risk and the balance of individual asset risks are appropriate.

We also consider other factors that we believe to be financially material over time horizons relevant to the funding of the benefits, including environmental, social and governance ("ESG") factors and the risks and opportunities relating to climate change.

Our key investment beliefs, which influence the setting of the investment arrangements, are as follows:

- asset allocation is the primary driver of long-term returns
- risk-taking is necessary to achieve return, but not all risks are rewarded. Equity, credit and illiquidity are the primary rewarded risks. Risks that do not have an expected reward should generally be avoided, hedged or diversified
- investment markets are not always efficient and there may be opportunities for good active managers to add value
- however investment managers who can consistently spot and profitably exploit market opportunities are difficult to find and therefore passive management, where available, is usually better value
- costs may have a significant impact on long-term performance and therefore obtaining value for money from the investments is important
- long-term environmental, social and economic sustainability is a factor that we should consider when making investment decisions
- climate change is a financially material systemic issue that presents risks and opportunities for the Scheme over the short, medium and long term
- aligning our assets with net zero greenhouse gas emissions by 2050 where practicable is expected to help reduce the risks to the Scheme from climate change
- to be effective, a net zero program needs to be consistent with climate science, with both short-term and long-term targets and a focus on real world impacts

## 5. IMPLEMENTATION OF THE INVESTMENT ARRANGEMENTS

Before investing in any manner, we obtain and consider proper written advice from our investment adviser as to whether the investment is satisfactory, having regard to the need for suitable and appropriately diversified investments.

We have signed agreements with the investment managers setting out the terms on which the portfolios are to be managed. Details of the investment manager are set out in the separate SIP addendum.

We have limited influence over managers' investment practices because all the Scheme's assets are held in pooled funds, but we encourage our managers to improve their practices within the parameters of the fund they are managing.

Our view is that the fees paid to the investment managers, and the possibility of their mandate being terminated, ensure they are incentivised to provide a high quality service that meets the stated objectives, guidelines, and restrictions of their fund. However, in practice managers cannot fully align their strategy and decisions to the (potentially conflicting) policies of all their pooled fund investors in relation to strategy, long-term performance of debt/equity issuers, engagement, and portfolio turnover.

It is our responsibility to ensure that the managers' investment approaches are consistent with our policies before any new appointment, and to monitor and to consider terminating any arrangements that appear to be investing contrary to those policies. We expect investment managers to make decisions based on assessments of the longer term performance of debt/equity issuers, and to engage with issuers to improve their performance (or where this is not appropriate to explain why). We assess this when selecting and monitoring managers.

We evaluate investment manager performance over both shorter and longer term periods as available. Except in closed-ended funds where the duration of the investment is determined by the fund's terms, the duration of a manager's appointment will depend on strategic considerations and the outlook for future performance. If a manager is not meeting its performance objectives, we will consider alternative arrangements.

Our policy is to evaluate each of our investment managers by considering performance, the role it plays in helping to meet our overall long-term objectives, taking account of risk, the need for diversification and liquidity. Each manager's remuneration, and the value for money it provides, is assessed in light of these considerations.

We recognise that portfolio turnover and associated transaction costs are a necessary part of investment management. Since the impact of these costs is reflected in performance figures used in our assessment of the investment managers, we do not explicitly monitor portfolio turnover. We expect our investment consultant to incorporate portfolio turnover and resulting transaction costs as appropriate in its advice on the Scheme's investment mandates.

## 6. REALISATION OF INVESTMENTS

We have a policy to receive income from some of the portfolios, where appropriate to help meet benefit payments and other outgoings for the Scheme. We will also instruct disinvestments as required to supplement this to cover any anticipated shortfall.

Our preference is for investments that are readily realisable but recognise that achieving a well-diversified portfolio may mean holding some investments that are less liquid.

## 7. FINANCIALLY MATERIAL CONSIDERATIONS AND NON-FINANCIAL MATTERS

We consider how ESG considerations (including but not limited to climate change) should be addressed in the selection, retention, and realisation of investments, given the time horizon of the Scheme and its members.

We influence the Scheme's approach to ESG and other financially material factors through our investment strategy and manager selection decisions. We expect all of our investment managers to take account of financially material factors (including climate change and other ESG factors) within the parameters of the mandates they are set. We seek to appoint managers that have the skills and processes to do this, and review how the managers are taking account of these issues in practice.

We encourage our managers to improve their ESG practices, although acknowledge that we have limited influence over managers' investment practices where assets are held in pooled funds and that the parameters of some pooled funds may limit the scope for significant incorporation of ESG factors.

Our ambition is to align our assets with net zero greenhouse gas emissions by 2050 through selecting managers, and investing in funds, with credible net zero targets.

In determining the investment arrangements, we considered investment options that give increased weight to ESG factors. We have chosen to invest part of the equity allocation in a passively managed fund that tracks an index with reduced exposure to climate-related risks and increased exposure to climate-related opportunities.

We do not consider matters that are purely non-financial in nature (ie matters relating to the ethical and other views of members and beneficiaries, rather than considerations of financial risk and return) in the selection, retention, and realisation of investments. However, the line between financial and non-financial factors is not always clear and some non-financial factors that may not immediately present as financially material may have the potential to become so in the future. We keep this under review as part of our overall consideration of ESG considerations.

## 8. VOTING AND ENGAGEMENT

We recognise our responsibilities as owners of capital, and believe that good stewardship practices, including monitoring and engaging with investee companies, and exercising voting rights attaching to investments, protect and enhance the long-term value of investments and is in the best interests of our members.

We seek to appoint investment managers that have strong stewardship policies and processes, reflecting the principles of the UK Stewardship Code 2020 issued by the Financial Reporting Council. We have delegated to the investment managers the exercise of rights attaching to investments, including voting rights, and engagement with relevant persons such as issuers of debt and equity, stakeholders and other investors about relevant matters such as performance, strategy, capital structure, management of actual or potential conflicts of interest, risks and ESG factors. We expect the managers to undertake voting and engagement in line with their stewardship policies, considering the long-term financial interests of investors.

As all of our investments are held through managers or pooled funds we do not monitor or engage directly with issuers or other holders of debt or equity.

## 8. VOTING AND ENGAGEMENT CONTINUED

We monitor managers' activities in relation to ESG factors, voting and engagement on a regular basis. We seek to understand how they are implementing their stewardship policies in practice to check that their stewardship is effective and aligned with our expectations.

We have selected some priority ESG themes to provide a focus for our monitoring of investment managers' voting and engagement activities. We review the themes regularly and update them if appropriate. We communicate these stewardship priorities to our manager each year and also confirm our more general expectations in relation to ESG factors, voting and engagement.

If our monitoring identifies areas of concern, we will engage with the relevant manager to encourage improvements.

EFFECTIVE FROM 6 NOVEMBER 2023

## **PART 1: INVESTMENT GOVERNANCE, RESPONSIBILITIES, DECISION-MAKING AND FEES**

We have decided on the following division of responsibilities and decision making for the Scheme. This division is based upon our understanding of the various legal requirements placed upon us and our view that the division of responsibility allows for efficient operation and governance of the Scheme overall. Our investment powers are set out within the Scheme's governing documentation

### **1. TRUSTEES**

Our responsibilities include:

- developing a mutual understanding of investment and risk issues with the Club
- setting the investment strategy, in consultation with the Club
- setting investment policies, including those relating to financially material factors and the exercise of rights and engagement activities in respect of the investments
- putting effective governance arrangements in place and documenting these arrangements in a suitable form
- monitoring, reviewing, engaging with and replacing investment managers, investment advisers, actuary, and other service providers
- monitoring the exercise of investment powers that we have delegated to the investment managers and monitoring compliance with Section 36 of the Pensions Act 1995 (as amended)
- communicating with members as appropriate on investment matters, such as our assessment of our effectiveness as a decision-making body, the policies regarding responsible ownership and how such responsibilities have been discharged
- reviewing the SIP and modifying it as necessary, including consulting with the Marylebone Cricket Club (the "Club").

### **2. INVESTMENT MANAGER**

The investment manager's responsibilities include:

- managing the portfolios of assets according to their stated objectives, and within the guidelines and restrictions set out in their respective investment manager agreements and/or other relevant governing documentation
- taking account of financially material considerations (including climate change, net zero alignment and other Environmental, Social and

## 2. INVESTMENT MANAGER CONTINUED

- Governance ("ESG") considerations) as appropriate in managing the assets
- exercising rights (including voting rights) attaching to investments and undertaking engagement activities in respect of investments
- providing regular information concerning the management and performance of their respective portfolios, including information on voting and engagement undertaken and progress on net zero alignment over time
- having regard to the provisions of Section 36 of the Act insofar as it is necessary to do so.

The custodians of the portfolios are responsible for safe keeping of the assets and facilitating all transactions within the portfolios.

## 3. INVESTMENT ADVISER

The investment adviser's responsibilities include:

- advising on how material changes within the Scheme's benefits, membership, and funding position may affect the manner in which the assets should be invested
- advising on the selection, and review, of the investment managers, incorporating its assessment of the nature and effectiveness of the managers' approaches to financially material considerations (including climate change and other ESG considerations)
- supporting us in achieving the Scheme's net zero ambition, including through manager selection, monitoring and engagement. assisting us with reviews of this SIP.

## 4. FEE STRUCTURES

The provision of investment management and advisory services to the Scheme results in a range of charges to be met, directly or indirectly, by deduction from the Scheme's assets. We have agreed terms with the Scheme's investment advisers, under which work undertaken is charged for by an agreed fixed fee or on a "time-cost" basis.

The investment manager receives fees calculated by reference to the market value of assets under management.

The fee structure used in each case has been selected with regard to existing custom and practice, and our view as to the most appropriate arrangements for the Scheme, and we keep the fee structures under review.

## 5. PERFORMANCE ASSESSMENT

We are satisfied that there are adequate resources to support our investment responsibilities, and that we have sufficient expertise to carry out our role effectively. It is our policy to assess the performance of the Scheme's investments, investment providers and professional advisers from time to time. We will also periodically assess the effectiveness of our decision-making and investment governance processes and will decide how this may then be reported to members.



## 6. WORKING WITH THE CLUB

When reviewing matters regarding the Scheme's investment arrangements, such as the SIP, we seek to give due consideration to the Club's perspective. Whilst the requirement to consult does not mean that we need to reach agreement with the Club, we believe that better outcomes will generally be achieved if we work with the Club collaboratively.

## PART 2: POLICY TOWARDS RISK

### 1. RISK CAPACITY AND APPETITE

Risk capacity is the maximum level of risk that we consider to be appropriate to take in the investment strategy. Risk appetite is how much risk we believe is appropriate to take in order to meet the investment objectives. Taking more risk is expected to mean that those objectives can be achieved more quickly, but it also means that there is a greater likelihood that the objectives are missed, in the absence of remedial action.

When assessing risk and reviewing the investment strategy, we consider:

- the strength of the employer covenant and how this may change over time
- the agreed journey plan and employer contributions
- the Scheme's long-term and shorter-term funding targets
- the Scheme's liability profile, its interest rate and inflation sensitivities, and the extent to which these are hedged
- the Scheme's cash flow and target return requirements
- the level of expected return and expected level of risk (as measured by Value at Risk ("VaR")), now and as the strategy evolves.

When deciding on the current investment strategy, we believed this level of risk to be appropriate given the Scheme's objectives.

### 2. APPROACH TO MANAGING AND MONITORING RISKS

There are different types of investment risk that are important to manage, and we monitor these on a regular basis. These include, but are not limited to:

#### **Risk of inadequate returns**

A key objective is that the assets produce a sufficient long-term return in excess of the liabilities, and we have set an appropriate target return for the assets accordingly. There is a risk that the return experienced is not sufficient. This risk has been considered in setting the investment strategy.

#### **Risk from lack of diversification**

This is the risk that failure of a particular investment, or the general poor performance of a given investment type (eg equities), could materially adversely affect the Scheme's assets. We believe that the Scheme's assets are adequately diversified between different asset classes and within each asset class. This was a key consideration when determining the Scheme's investment arrangements.

## 2. APPROACH TO MANAGING AND MONITORING RISKS CONTINUED

### Equity risk

We believe that equity risk is a rewarded investment risk, over the long term. We consider exposure to equity risk in the context of the Scheme's overall investment strategy and believe that the level of exposure to this risk is appropriate.

### Credit risk

The Scheme is subject to credit risk because it invests in bonds via pooled funds. This risk is managed by only investing in pooled funds that have a diversified exposure to different credit issuers, and predominantly invest in bonds that are classified as "investment grade".

### Currency risk

Whilst the majority of the currency exposure of the Scheme's assets is to Sterling, the Scheme is subject to currency risk because some of the Scheme's investments are held in overseas markets. We consider the overseas currency exposure in the context of the overall investment strategy and believe that it diversifies the strategy and is appropriate.

### Interest rate and inflation risk

The Scheme's assets are subject to interest rate and inflation risk because some of the Scheme's assets are held in bonds, via pooled funds. However, the interest rate and inflation exposure of the Scheme's assets provide protection (hedges) part of the corresponding risks associated with the Scheme's liabilities. Given that this should reduce the volatility of the funding level, we believe that it is appropriate to manage exposures to these risks in this manner.

### Investment manager risk

This is the risk that an investment manager fails to meet its investment objectives. Prior to appointing an investment manager, we receive written professional advice, and we will typically undertake a manager selection exercise. We monitor the investments regularly against their objectives and receive ongoing professional investment advice as to their suitability.

### Climate-related risks

Climate change is a source of risk, which could be financially material over both the short and longer term. This risk relates to the transition to a low carbon economy, and the physical risks associated with climate change (eg extreme weather). We seek to appoint investment managers who will manage this risk appropriately, and we monitor how this risk is being managed in practice. We encourage our managers (where practical) to set credible net zero targets for the funds in which we invest and to align our investments with net zero greenhouse gas emissions by 2050 to help drive real world emissions reduction and reduce systemic risks relating to climate change. We monitor and engage with our managers on their progress towards net zero alignment.

## 2. APPROACH TO MANAGING AND MONITORING RISKS CONTINUED

### Other environmental, social and governance (ESG) risks

ESG factors are sources of risk, which could be financially material over both the short and longer term. These include risks relating to unsustainable or socially harmful business practices, and unsound corporate governance. We seek to appoint investment managers who will manage these risks appropriately and monitor how these risks are being managed in practice.

### Illiquidity/marketability risk

This is the risk that the Scheme is unable to realise assets to meet benefit cash flows as they fall due, or that the Scheme will become a forced seller of assets in order to meet benefit payments. We are aware of the Scheme's cash flow requirements and believe that this risk is managed by maintaining an appropriate degree of liquidity across the Scheme's investments and by investing in income generating assets, where appropriate.

### Valuation risk

Some of the Scheme's assets (such as listed equities) can be valued regularly based upon observable market prices. For other assets (such as secure income), prices may only be estimated relatively infrequently using one or more of a range of approximate methods - eg mathematical models or recent sales prices achieved for equivalents.

At times of market stress, there is a risk for all assets that the valuations provided by investment managers do not reflect the actual sale proceeds which could be achieved if the assets were liquidated at short notice. This risk is particularly relevant for assets such as property.

We consider exposure to valuation risk in the context of the Scheme's overall investment strategy and believe that the level of exposure to this risk is appropriate.

### Other non-investment risks

We recognise that there are other non-investment risks faced by the Scheme. We take these into consideration as far as practical in setting the investment arrangements.

Examples include:

- longevity risk (risk that members live, on average, longer than expected); and
- sponsor covenant risk (risk that, for whatever reason, the sponsoring Club is unable to support the Scheme as anticipated).

Both investment and non-investment risks can lead to the funding position materially worsening. We regularly review progress against the funding target.

## PART 3: INVESTMENT MANAGER ARRANGEMENTS

We have selected Legal & General Investment Management (“LGIM”) as the investment manager for the Scheme’s assets, which are split into the Equity Portfolio, the DGF Portfolio, the Bond Portfolio and the Alternative Portfolio respectively. The strategic allocations to the portfolios are:

ASSET CLASS	BENCHMARK ALLOCATION
Equity Portfolio	5%
DGF Portfolio	10%
Bond Portfolio	75%
Secure Income Portfolio	10%
<b>Total</b>	<b>100%</b>

All of LGIM’s funds within each of the above Portfolios are structured as unit-linked pooled life insurance policies.

LGIM are mandated to automatically rebalance the Scheme’s assets between the Equity, DGF and Bond Portfolios, with the following benchmark and control ranges

ASSET CLASS	BENCHMARK ALLOCATION	CONTROL RANGE
Equity Portfolio	5.5%	+/-2.5%
DGF Portfolio	11.1%	+/-2.5%
Bond Portfolio	83.4%	+/-5.0%
<b>Total</b>	<b>100.0%</b>	

### The Equity Portfolio

The benchmark for the fund within the Equity Portfolio is as follows:

ASSET CLASS	BENCHMARK ALLOCATION	CONTROL RANGE	BENCHMARK INDEX
Low Carbon Transition Global Index Fund	100%	N/A	Solactive L&G Low Carbon Transition Global Index
<b>Total</b>	<b>100.0%</b>		

The stated objective of the Fund is to produce a return consistent with the Solactive L&G Low Carbon Transition Global Index. The index aims to provide exposure to developed and emerging equity markets while reducing carbon intensity by 70% at the outset on a de-carbonisation path to achieve net zero by 2050, whilst also significantly reducing the level of carbon reserves and improving green revenues through exposure to six underlying alternatively weighted indices

## The DGF Portfolio

The benchmark for the fund within the DGF Portfolio is as follows:

ASSET CLASS	BENCHMARK ALLOCATION	CONTROL RANGE	BENCHMARK INDEX
Dynamic Diversified Fund	100%	N/A	Bank of England Base Rate +4.5% pa
<b>Total</b>	<b>100.0%</b>		

LGIM's Dynamic Diversified Fund provides exposure to a range of different asset classes including equities, bonds, property, commodities and listed infrastructure, private equity and global real estate companies, which may be actively or passively managed. The asset allocation of the fund is managed by LGIM with the aim of enhancing returns and managing downside risk. The fund provides exposure to a combination of UK and overseas assets with a flexible approach taken to managing foreign currency exposure. Derivatives may be used for efficient portfolio management.

## The Bond Portfolio

The benchmarks for each of the funds within the Bond Portfolio are as follows:

ASSET CLASS	BENCHMARK ALLOCATION	CONTROL RANGE	BENCHMARK INDEX
Buy & Maintain Credit (Distribution)	33.34%	+/-5.0%	N/A
Over 15 Year Index-Linked Gilts	33.33%	+/-5.0%	FTSE A UK Index-Linked (Over 15 Year) Index
Over 15 Year Fixed Gilts	33.3%	+/-5.0%	FTSE A UK Conventional (Over 15 Year) Index
<b>Total</b>	<b>100.0%</b>		

LGIM's Buy & Maintain Credit Fund aims to capture the credit risk premium within a globally diversified portfolio of predominantly investment grade credit and to preserve value over the course of the credit cycle by avoiding defaults and securities experiencing a significant deterioration in credit quality.

LGIM's objectives for the Index-Linked and Fixed Gilt Funds are to track within specified tolerances the total return of the relevant market index, at least two years out of three, before the deduction of fees and after allowance for withholding tax where applicable.

## The Secure Income Portfolio

The benchmarks for the fund within the Secure Income Portfolio are as follows:

ASSET CLASS	BENCHMARK ALLOCATION	CONTROL RANGE	BENCHMARK INDEX
Secure Income Assets	100%	N/A	N/A
<b>Total</b>	<b>100.0%</b>		

LGIM's objective for its Secure Income Assets Fund is to deliver stable, long-term cashflows from a portfolio of diversified secure income assets. The Fund targets a return of gilts+2.5% pa (gross of fees) over a rolling three-year period.

## Additional voluntary Contributions

We have selected ReAssure as the Scheme's AVC provider.

## PART 4: MONITORING AND ENGAGING WITH MANAGERS ON VOTING AND ENGAGEMENT

This section sets out our approach to stewardship. This includes monitoring the voting and engagement activities that our investment managers undertake on our behalf, engaging with them regarding our expectations in relation to stewardship, and encouraging improvements in their stewardship practices. We will review our approach periodically.

### Stewardship priorities

We have selected some priority themes to provide a focus for our monitoring of investment managers' voting and engagement activities. We will review them regularly and update them if appropriate. Our current priorities are:

- climate change
- business ethics
- corporate transparency.

We chose these priorities because they are market-wide areas of risk that are financially material for the investments and can be addressed by good stewardship. Therefore we believe it is in our members' best interests that our managers adopt strong practices in these areas.

We will write to our investment managers regularly to notify them of our stewardship priorities and remind them of our expectations of them in relation to responsible investment.

### **Manager selection**

We aim to appoint investment managers that have strong responsible investment skills and processes. We therefore favour investment managers who are signatories to the Principles for Responsible Investment, the UK Stewardship Code as well as the Net Zero Asset Managers Initiative.

When selecting new managers, we consider our investment consultant's assessment of potential managers' capabilities in this area.

### **Manager monitoring**

We receive information regularly to enable us to monitor our managers' responsible investment practices and check how effective they're being.

This information includes metrics such as our investment consultant's responsible investment grades for each manager, whether they are signatories to responsible investment initiatives, and (where available) carbon emissions data for our mandates.

Given that responsible investment is rapidly evolving, we expect most managers will have areas where they could improve. We therefore aim to have an ongoing dialogue with our managers to clarify our expectations and encourage improvements.

### **Implementation statement**

Following the end of each Scheme year, we prepare a statement which explains how we have implemented our Statement of Investment Principles voting and engagement policies during the year. We publish it online for our members to read.