

Society of Radiographers Pension & Life Assurance Scheme (the 'Scheme')

Statement of Investment Principles (the 'Statement')

Scope of Statement

This Statement has been prepared in accordance with s35 and s36 of the Pensions Act 1995, as amended by s244 and s245 of the Pensions Act 2004, respectively, and the Occupational Pension Schemes (Investment) Regulations 2005.

The effective date of this Statement is 16 April 2024. The Trustees will review this Statement and the Scheme's investment strategy no later than three years after the effective date of this Statement and without delay after any significant change in investment policy.

Consultations made and parties involved

The Trustees have consulted with the Employer prior to writing this Statement and will take the Employer's comments into account when it believes it is appropriate to do so. The Trustees will also consult with the Employer on any revision to this statement.

The Trustees are responsible for the investment strategy of the Scheme. It has obtained and considered written advice on the investment strategy appropriate for the Scheme. It has obtained advice on the preparation of this Statement and this advice was provided by Aon Investments Ltd ('AIL') who are authorised and regulated by the Financial Conduct Authority.

The Trustees have decided to invest the Scheme's assets in a range of fruition fund solutions provided by AIL. The funds comprise of both growth and liability matching assets. AIL conducts the necessary day to day management of the funds required to meet the Trustees' objectives.

A copy of this Statement is available to the members of the Scheme.

Objective

The objective of the investment strategy is to ensure that the Scheme's assets and future contributions are invested in such a manner that the benefits due to members and their beneficiaries can be paid from the Scheme as they arise.

The balance between different kinds of investment

The Scheme has an allocation to two ALL fruition funds, the Real +2% Fund and the Fixed +2% Fund, which both contain exposure to a Managed Growth Fund and liability hedging instruments, as detailed in the table below.

Investment	Objective	Return Target	Allocation
Adept 21 Fund (Real +2% p.a.)	<p>There are two components:</p> <ul style="list-style-type: none"> It invests in a portfolio of leveraged index linked gilt funds that have been selected to hedge the interest rate risk of a pension scheme with real (inflation linked) benefits, a duration of 17.2² years and a typical cashflow profile. It invests in the Managed Growth Fund, which targets a return of 4% p.a. above cash (i.e., SONIA). <p>The above returns are net of investment management costs and are expected to broadly match the Scheme's Technical Provision liabilities.</p>	To outperform (net of fees) the benchmark by 2% per annum over a market cycle ¹	75%
Adept 20 Fund (Fixed +2% p.a.)	<p>There are two components:</p> <ul style="list-style-type: none"> It invests in a portfolio of leveraged nominal gilt funds which are selected to hedge the interest rate risk of a pension scheme with fully fixed (non-inflation linked) benefits, a duration of 15.8² years and a typical cashflow profile. It invests in the Managed Growth Fund, which targets a return of 4% p.a. above cash (SONIA). <p>The above returns are net of investment management costs and are expected to broadly match the Scheme's Technical Provision liabilities.</p>	To outperform (net of fees) the benchmark by 2% per annum over a market cycle ¹	25%

- Benchmark: The weighted average of the return on the Liability Driven Investment ("LDI") funds held plus a notional GBP SONIA return on all other assets within the Funds*
- Duration figures as at 31st December 2023*

The objective of this investment strategy is to achieve an asset return over rolling three-year periods in excess of the discount rates set out in the Scheme's Statement of Funding Principles.

The Trustees review the investment strategy in conjunction with each formal actuarial valuation of the Scheme (or more frequently should the circumstances of the Scheme change in a material way). The Trustees will review the funding of the Scheme, and hence the performance of the Investment Strategy quarterly through the quarterly funding update reports prepared by the Scheme Actuary.

Additionally, the Trustees will meet with their investment adviser and Scheme Actuary and review investment matters, including, as appropriate, this Statement and the investment performance at least annually. The Trustees take written advice from its professional advisers regarding the appropriate investment strategy for the Scheme.

Asset allocation strategy

The Scheme's investment strategy has been established as laid out below. The Scheme's actual position relative to this asset allocation strategy is to be formally reviewed on an annual basis in order to determine whether any rebalancing is required.

<u>Investment</u>	<u>Target Weight (%)</u>
Adept 21 Fund (Real +2% p.a.)	75%
Adept 20 Fund (Fixed +2% p.a.)	25%

Expected returns on assets

The target return of the investments is outlined above. Broadly speaking, the objective of the Managed Growth Fund within the Real and Fixed Funds is to generate long term capital growth through investment in a diversified portfolio of assets. The Real and Fixed Funds also aim to provide a broad match to the Scheme's movements in liabilities relating to changes in interest rates and expected inflation.

Risks arising from the investments and risk management

The Trustees measure and manage the credit risk, market risk and liability mismatching risk of the Scheme's investments on a regular basis. In the case of market risk, the Trustees make a distinction between risks that arise from: currency exposure, interest rate and inflation exposure, and other pricing risks.

Measurement of each of the risks is detailed in ongoing reporting provided by AIL. The methods the Trustees employ for managing each risk is set out below.

Credit risk

Credit risk is the risk that one party to a financial instrument will cause a financial loss for the other part by failing to discharge an obligation.

Direct credit risk arising from pooled investment vehicles is mitigated by the underlying assets of the pooled arrangements being ring-fenced from the pooled manager, the regulatory environments in which the pooled managers operate and diversification of investments amongst a number of pooled arrangements. The manager carries out due diligence checks on the appointment of new pooled investment managers and on an ongoing basis monitors any changes to the operating environment of a pooled manager.

Indirect credit risk arises in relation to exposure to underlying bond pooled investment vehicles. This risk is mitigated through the underlying exposures on aggregate basis being predominantly investment grade credit securities, and by funds holding a diverse portfolio of investments with exposure to a range of issues and issuers.

Cash is held within financial institutions which are at least investment grade credit rated.

Currency risk

Currency risk is the risk that the fair value of future cash flows of a financial asset will fluctuate because of changes in foreign exchange rates.

The Scheme is subject to currency risk because some of the Scheme's investments are held in overseas markets via pooled investment vehicles. AIL may enter into currency exchange transactions

and/or use techniques and instruments to seek to protect against fluctuation in the relative value of its portfolio positions as a result of changes in currency exchange rates between the trade and settlement dates of specific securities transactions or anticipated securities transactions.

Interest rate and inflation risk

Interest rate and inflation risk is the risk that the fair value or future cash flows of a financial asset, primarily bonds, interest rate swaps and pooled investment vehicles held mainly in bonds, will fluctuate because of changes in market interest rates.

The Scheme is subject to interest rate and inflation risk because some of the Scheme's investments are held in gilt derivatives, through pooled vehicles, and cash. These investments are held in order to mitigate the impact of interest rate and inflation changes on the Scheme's liabilities. The Scheme also has some exposure to bond pooled investment vehicles as part the diversified return seeking growth portfolio.

Liability mismatching risk

Liability mismatching risk is the risk that changes in the value placed on the Scheme's liabilities are not matched by appropriate changes in the value of the Scheme's assets.

The Scheme's investment strategy is determined through discussion with the Scheme Actuary in relation to the actuarial valuation and recovery plan. The investment adviser and Actuary work closely to agree the required level of expected return above the discount rate and appropriate levels of liability hedging that broadly reflects the Scheme's liability profile.

Other price risk

The Trustees define other price risk as the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in market prices (other than those arising from interest rate risk or currency risk), whether those changes are caused by factors specific to the individual financial instrument or its issuer, or factors affecting all similar financial instruments traded in the market.

Other price risk arises principally in relation to the Scheme's return seeking assets which are held in pooled vehicles, investing in turn in a diversified range of pooled vehicles including, but not limited to, equities, fixed income, debt, property, infrastructure, hedge funds and other asset classes.

Realisation of investments and liquidity

The Trustees recognise that there is a risk in holding assets that cannot be easily realised should the need arise.

The majority of the assets held are realisable at short notice (through the sale of units in pooled funds).

In setting the Scheme's investment strategy, the Trustees' primary concern is to act in the best financial interests of the Scheme and its beneficiaries, seeking the best return that is consistent with a prudent and appropriate level of risk.

Environmental, Social, and Governance ("ESG") considerations

The Trustees consider investment risk to include ESG factors and climate change. These risks could negatively impact the Scheme's investments. The Trustees considers these risks by taking advice from its investment adviser.

Members' Views and Non-Financial Factors

In setting and implementing the Scheme's investment strategy the Trustees do not explicitly take into account the views of Scheme members and beneficiaries in relation to ethical considerations, social and environmental impact, or present and future quality of life matters (defined as "non-financial factors"^[1]).

Stewardship Policy

The Trustees recognise the importance of their role as a steward of capital and the need to ensure the highest standards of governance and promotion of corporate responsibility in the underlying companies and assets in which the Scheme invests, as ultimately this creates long-term financial value for the Scheme and its beneficiaries.

The Trustees have delegated all voting and engagement activities to the Scheme's underlying managers, via AIL. The Trustees accept responsibility for how the underlying managers steward assets on their behalf, including the casting of votes in line with each underlying manager's individual voting policies. The Trustees rely on AIL to review manager voting and engagement policies and activities on an annual basis. AIL reviews these factors to check they are aligned with expectations and can reasonably be considered to be in the Trustees', and therefore the members', best interests.

As part of AIL's management of the Scheme's assets, the Trustees expect the manager to:

- monitor and engage with underlying managers, including prospective underlying managers, on the extent to which they exercise voting rights (where appropriate) in relation to the Scheme's assets; and
- report to the Trustees on stewardship activity by underlying managers as required.

Underlying managers are expected to vote at company meetings and engage with companies on the Trustees' behalf in relation to ESG considerations and other relevant matters (such as the companies' performance, strategy, risks, capital structure, and management of conflicts of interest).

Where possible, the transparency for voting should include voting actions and rationale with relevance to the Scheme's assets, in particular where: votes were cast against management; votes against management generally were significant; votes were abstained; voting differed from the voting policy of the Trustees.

Where voting is concerned, the Trustees expect the underlying managers to recall stock lending, as necessary, in order to carry out voting actions.

The Trustees will engage with AIL, which in turn is able to engage with underlying managers or other stakeholders, on matters including the performance, strategy, risks, social and environmental impact, corporate governance, capital structure, and management of actual or potential conflicts of interest, of the underlying investments made.

This engagement aims to ensure that robust active ownership behaviours, reflective of the Trustees' active ownership policies, are being actioned. This will take the form of annual reporting and follow up meetings, where necessary, from AIL. Such reporting will be made available to Scheme members on request.

Should the Trustees' monitoring process reveal that an underlying manager's voting and engagement policies and actions are not aligned with the Trustees' expectations, the Trustees will engage with

^[1] The Pension Protection Fund (Pensionable Service) and Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018

AIL, via different medium such as emails and meetings, to discuss how alignment may be improved to bring about the best long-term outcomes for the Scheme.

Arrangements with asset managers

The Trustees recognise that the arrangements with AIL, and correspondingly the underlying managers, are important to ensure that interests are aligned. In particular, the Trustees seek to ensure that AIL is incentivised to operate in a manner that generates the best long-term results for the Scheme and its beneficiaries.

The Trustees receive quarterly reports and verbal updates, from AIL on various items including performance of AIL's funds. The Trustees focus on longer-term performance when considering the ongoing suitability of the investment strategy in relation to the Scheme objectives and assess AIL over 3-year periods.

The Trustees also receive annual stewardship reports on the monitoring and engagement activities carried out by AIL, which supports the Trustees in determining the extent to which the Scheme's engagement policy has been followed throughout the year.

The Trustees share their policies, as set out in this SIP, with AIL and request that they review and confirm whether their approach is in alignment with the Trustees' policies. The Trustees delegate the ongoing monitoring of underlying managers to AIL. AIL monitors the Scheme's investments to consider the extent to which the investment strategy and decisions of the underlying managers are aligned with the investment objectives of the Scheme. This includes monitoring the extent to which the underlying managers:

- make decisions based on assessments about medium- to long-term financial and non-financial performance of an issuer of debt or equity; and
- engage with issuers of debt or equity in order to improve their performance in the medium- to long-term.

Before appointment of a new asset manager, the Trustees review the governing documentation associated with the investment and will consider the extent to which it aligns with their policies. Where possible, the Trustees will seek to amend that documentation or express their expectations (such as through side letters, in writing, or verbally at Trustee meetings) so that there is more alignment.

The Trustees believe that having appropriate governing documentation, setting clear expectations to AIL, and regular monitoring of AIL's performance and investment strategy, is sufficient to incentivise AIL to make decisions that align with the Trustees' policies and are based on assessments of medium- and long-term financial and non-financial performance.

Where AIL is considered to make decisions that are not in line with the Trustees' policies, expectations, or the other considerations set out above, the Trustees will typically first engage with AIL but could ultimately replace AIL where this is deemed necessary.

There is typically no set duration for arrangements with AIL, although the continued appointment will be reviewed periodically. Similarly, there are no set durations for arrangements with the underlying managers that AIL invests in, although this is regularly reviewed as part of the manager research and portfolio management processes in place. For certain closed ended vehicles, the duration may be defined by the nature of the underlying investments.

Cost Monitoring

The Trustees are aware of the importance of monitoring AIL's total costs and the impact these costs can have on the overall value of the Scheme's assets. The Trustees recognise that in addition to annual management charges, there are other costs incurred by asset managers that can increase the overall cost incurred by their investments.

The Trustees receive annual cost transparency reports from AIL. These reports present information in line with prevailing regulatory requirements for asset managers. They clearly set out on an itemised basis:

- the total amount of investment costs incurred by the Scheme;
- the fees paid to AIL;
- the fees paid to the underlying managers appointed by AIL;
- the amount of portfolio turnover costs (transaction costs) incurred by the investment managers appointed by AIL;
- the Trustees define portfolio turnover costs as the costs incurred in buying and selling underlying securities held within the funds of the underlying managers appointed by AIL;
- any charges incurred through the use of pooled funds (custody, admin, audit fees etc);
- the impact of costs on the investment return achieved by the Scheme.

The Trustees acknowledge that portfolio turnover costs are a necessary cost to generate investment returns and that the level of these costs varies across asset classes and manager. AIL monitors the level of portfolio turnover (defined broadly as the amount of purchases plus sales) of all the underlying managers appointed on behalf of the Trustees.

The Trustees benefit from the economies of scale provided by AIL in two key cost areas:

- the ability of AIL to negotiate reduced annual management charges with the appointed underlying managers;
- the ability of AIL to monitor ongoing investment costs (including additional fund expenses and portfolio turnover) incurred by the underlying managers and achieve efficiencies where possible.

Evaluation of performance and remuneration:

The Trustees assess the (net of all costs) performance of AIL on a rolling three-year basis against the Scheme's specific liability benchmark and investment objective.

The remuneration paid to AIL and fees incurred by third parties appointed by AIL are provided annually by the asset manager to the Trustees. This cost information is set out alongside the performance of AIL to provide context. The Trustees monitor these costs and performance trends over time.

In setting the Scheme's investment strategy, the Trustees' primary concern is to act in the best financial interests of the Scheme and its beneficiaries, seeking the best return that is consistent with a prudent and appropriate level of risk.

The Trustees of the Scheme

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