Statement of Investment Principles for the NMB-Minebea UK Pension Scheme

1. Introduction

This Statement of Investment Principles ("SIP") sets out the policy of the Trustees of the NMB-Minebea UK Pension Scheme ("the Scheme") on various matters governing decisions about the investments of the Scheme. This SIP replaces the previous SIP dated September 2019.

The SIP is designed to meet the requirements of Section 35 (as amended) of the Pensions Act 1995 ("the Act"), the Occupational Pension Schemes (Investment) Regulations 2005 (as amended) and the Occupational Pension Schemes (Charges and Governance) Regulations 2015.

This SIP has been prepared after obtaining and considering written professional advice from LCP, the Scheme's investment adviser, whom the Trustees believe to be suitably qualified and experienced to provide such advice. The advice considers the suitability of investments including the need for diversification, given the circumstances of the Scheme, and the principles contained in this SIP. The Trustees have consulted with the relevant employer in producing this SIP.

The Trustees will review this SIP from time to time and, with the help of their advisers, will amend it as appropriate. These reviews will take place as soon as practicable after any significant change in investment policy and at least once every three years.

- **Appendix 1** sets out details of the Scheme's investment governance structure, including the key responsibilities of the Trustees, investment adviser and investment managers. It also contains a description of the basis of remuneration of the investment adviser and the investment managers.

- **Appendix 2** sets out the Trustees' policy towards risk appetite, capacity, measurement and management.
- **Appendix 3** sets out the Scheme's investment manager arrangements.

2. Investment objectives

The Trustees' primary objective is to ensure that the Scheme should be able to meet benefit payments as they fall due. A secondary objective is that the Scheme's funding level (asset value relative to liabilities) should remain at an appropriate level. The Trustees are aware that there are various measures of funding, and have given due weight to those considered most relevant to the Scheme.

The Trustees' investment objective is to achieve an appropriate level of investment risk and return, whilst taking into account the primary and secondary objectives. What the Trustees determine to be an appropriate level of risk is set out in Appendix 2.

3. Investment strategy

The Trustees, with the help of their adviser and in consultation with the employer, reviewed the investment strategy in 2021, taking into account the objectives described in Section 2 above.

The Trustees agreed that the investment strategy of the Scheme should be based on the target asset allocation below.

Asset class	Strategic allocation
Global developed market equities	15%
Emerging market equities	5%
Diversified Growth Funds ("DGFs")	30%
Long-lease property	10%
Synthetic credit	5%
Liability Driven Investment ("LDI")	35%
Total	**100%**

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

The Trustees also have a long-term journey plan which is designed to reduce the allocation to return-seeking assets as the required return to reach a "low risk" funding target reduces.

4. Considerations made in determining the investment arrangements

When deciding how to invest the Scheme's assets, the Trustees consider several risks, including, but not limited to, those set out in Appendix 2. Some of these risks are more quantifiable than others, but the Trustees have tried to allow for the relative importance and magnitude of each risk.

The Trustees considered a wide range of asset classes, and the expected returns and risks associated with those asset classes as well as how these risks can be mitigated where appropriate. The average long-term key financial assumptions made by the Trustees' investment adviser (as at 31 March 2021) were as follows:

Asset class	Expected excess return over gilts (% pa)
Developed market equities	4.8
Emerging market equities	5.8
DGF	2.9
UK long lease property	3.4
Synthetic credit (4x leveraged)	1.6
LDI	0.0

In setting the strategy, the Trustees also took into account

- the Scheme's investment objectives, including the target return to meet these objectives;
- the Scheme's cashflow requirements in order to meet benefit payments in the near to medium term;
- the best interests of 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 employer 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;
- any other considerations which the Trustees consider financially material over the time horizon that the Trustees consider is needed for the funding of future benefits by the investments of the Scheme; and
- the Trustees' investment beliefs about how investment markets work, and which factors are most likely to impact investment outcomes.

The Trustees' key investment beliefs, which influenced the setting of the investment arrangements, are:

- 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;
- environmental, social and governance (ESG) factors are likely to be one area of market inefficiency and so managers may be able to improve risk-adjusted returns by taking account of ESG factors and is one factor that trustees should consider when making investment decisions;
- investment managers that have the flexibility to dynamically allocate across multiple asset classes can provide effective risk management and downside protection; and
- costs have a significant impact on long-term performance and therefore obtaining value for money from the investments is important.

5. Implementation of the investment arrangements

Before investing in any manner, the Trustees obtain and consider proper written advice from their investment adviser on the question of whether the investment is satisfactory, having regard to the need for suitable and appropriately diversified investments.

Details of the investment manager arrangements are set out in Appendix 3.

The Trustees have signed agreements with the Scheme's platform provider and investment managers, setting out in detail the terms on which the portfolios are to be managed. The investment managers' primary role is the day-to-day investment management of the Scheme's investments.

The managers are authorised under the Financial Services and Markets Act 2000 (as amended) to carry out such activities.

The Trustees and investment managers to whom discretion has been delegated exercise their powers to giving effect to the principles in this Statement of Investment Principles, so far as is reasonably practicable.

The Trustees have limited influence over managers' investment practices because all the Scheme's assets are held in pooled funds, but they encourage their managers to improve their practices where appropriate.

The Trustees' 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 the 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 the Trustees' responsibility to ensure that the managers' investment approaches are consistent with their policies before any new appointment, and to monitor and to consider terminating any existing arrangements that appear to be investing contrary to those policies. The Trustees expect investment managers, where appropriate, to make decisions based on assessments of the longer term financial and non-financial performance of debt/equity issuers, and to engage with issuers to improve their performance. They assess this when selecting and monitoring managers.

The Trustees evaluate investment manager performance by considering 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. Generally, the Trustees would be unlikely to terminate a mandate on short-term performance grounds alone.

The Trustees' policy is to evaluate each of their investment managers by reference to the manager's individual performance as well as the role it plays in helping the Scheme meet its 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.

The Trustees recognise that portfolio turnover and associated transaction costs are a necessary part of investment management and that the impact of portfolio turnover costs is reflected in performance figures provided by the investment managers. The Trustees expect their 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

The investment managers have discretion over the timing of realisation of investments of the Scheme within the portfolios that they manage, and in considerations relating to the liquidity of investments.

When appropriate, the Trustees, on the administrator's recommendation, decide on the amount of cash required for benefit payments and other outgoings and inform the investment managers of any liquidity requirements. The Trustees' 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 (eg property). In general, the Trustees' policy is to use cash flows to rebalance the Scheme's assets towards the strategic asset allocation.

7. Consideration of financially material and non financial matters

The Trustees have considered how environmental, social, governance ("ESG") and ethical factors should be taken into account in the selection, retention and realisation of investments, given the time horizon of the Scheme and its members.

The Trustees expect their investment managers to take account of financially material considerations (including climate change and other ESG considerations). The Trustees seek to appoint managers that have appropriate skills and processes to do this, and from time to time review how their managers are taking account of these issues in practice.

The Trustees have limited influence over managers' investment practices on ESG factors where the Trustees hold assets in pooled funds, but they encourage their managers to improve their practices where appropriate.

The Trustees do not take into account any non-financial matters (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.

8. Voting and engagement

The Trustees recognise their 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. The Trustees have delegated to their investment managers the exercise of rights attaching to investments, including voting rights, and engagement with issuers of debt and equity and other relevant persons about relevant matters such as performance, strategy, capital structure, management of actual or potential conflicts of interest, risks and ESG considerations.

The Trustees do not monitor or engage directly with issuers or other holders of debt or equity. They expect the investment managers to exercise ownership rights and undertake monitoring and engagement in line with the managers' general policies on stewardship, as provided to the Trustees from time to time, considering the long-term financial interests of the beneficiaries.

The Trustees seek to appoint managers that have strong stewardship policies and processes, reflecting where relevant the recommendations of the UK Stewardship Code issued by the Financial Reporting Council, and from time to time the Trustees review how these are implemented in practice.

9. Employer related investments

The Trustees' policy is not to hold any employer-related investments as defined in the Pensions Act 1995 and the Occupational Pension Schemes (Investment) Regulations 2005 except where the Scheme invests in pooled vehicles that may hold employer-related investments, in which case the total exposure to employer-related investments will not exceed 5% of the Scheme's total asset value.

Approved by the Trustee of the NMB-Minebea Pension Scheme on: *14 June 2021*

Investment governance, responsibilities, decision-making and fees

The Trustees have decided on the following division of responsibilities and decision-making for the Scheme. This division is based upon the Trustees' understanding of the various legal requirements placed upon them, and their view that this division allows for efficient operation of the Scheme overall, with access to an appropriate level of expert advice and service. The Trustees' investment powers are set out within the Scheme's governing documentation.

1. Trustees

In broad terms, the Trustees are responsible in respect of investment matters for:

- developing a mutual understanding of investment and risk issues with the employer;
- setting the investment strategy, in consultation with the employer;
- formulating a policy in relation to financially material considerations, such as those relating to ESG considerations (including but not limited to climate change);
- setting the policy for rebalancing between asset classes;
- setting a policy on the exercise of rights (including voting rights) and undertaking engagement activities in respect of the investments;
- putting effective governance arrangements in place and documenting these arrangements in a suitable form;
- reviewing the investment policy as part of any review of the investment strategy;
- appointing, monitoring, reviewing and dismissing investment managers, investment advisers, actuary and other service providers;
- monitoring the exercise of the investment powers that they have delegated to the investment managers and monitoring compliance with Section 36 of the Act;
- communicating with members as appropriate on investment matters, such as the Trustees' assessment of their effectiveness as a decision-making body, the policies regarding responsible ownership and how such responsibilities have been discharged;
- reviewing the content of this SIP from time to time and modifying it if deemed appropriate; and
- consulting with the employer when reviewing the SIP.

2. Platform provider

The investment platform provider will be responsible for:

- providing access to a range of funds managed by various investment managers; and
- providing the Trustees with regular information concerning the management and performance of the assets.

3. Investment managers

In broad terms, the investment managers will be responsible for:

- 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 and other ESG considerations) as appropriate when managing the portfolios of assets;
- exercising rights (including voting rights) attaching to investments and undertaking engagement activities in respect of investments;
- providing the Trustees with regular information concerning the management and performance of their respective portfolios; and
- having regard to the provisions of Section 36 of the Act insofar as it is necessary to do so.

The custodians of the portfolios (whether there is a direct relationship between the custodian and the Trustees or not) are responsible for safe keeping of the assets and facilitating all transactions within the portfolios.

4. Investment adviser

In broad terms, the investment adviser will be responsible, in respect of investment matters, as requested by the Trustees, for:

- 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 and the asset allocation policy;
- 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; and
- participating with the Trustees in reviews of this SIP.

5. Fee structures

The Trustees recognise that 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.

The Trustees have agreed Terms of Business with the Scheme's actuarial and investment advisers, under which charges are typically calculated on either a fixed fee or a "time-cost" basis.

The investment managers receive fees calculated by reference to the market value of assets under management. The fee rates are believed to be consistent with the managers' general terms for institutional clients and are considered by the Trustees to be reasonable when compared with those of other similar providers.

The fee structure used in each case has been selected with regard to existing custom and practice, and the Trustees' view as to the most appropriate arrangements for the Scheme. However, the Trustees will consider revising any given structure if and when it is considered appropriate to do so.

6. Performance assessment

The Trustees are satisfied, taking into account the external expertise available, that there are sufficient resources to support their investment responsibilities. The Trustees believe that they have sufficient expertise and appropriate training to carry out their role effectively.

It is the Trustees' policy to assess the performance of the Scheme's investments, investment providers and professional advisers from time to time. The Trustees will also carry out periodically an assessment of their own effectiveness as a decision-making body and will decide how this may then be reported to members.

7. Working with the Scheme's employer

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

Policy towards risk, risk measurement and risk management

1. Risk appetite and risk capacity

Risk appetite is a measure of how much risk the Trustees are willing to bear within the Scheme in order to meet their 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.

Risk capacity is a measure of the extent to which the Trustees can tolerate deviation from their long term objectives before attainment of those objectives is seriously impaired.

The Trustees aim is to strike the right balance between risk appetite and risk capacity.

When assessing the risk appetite and risk capacity, the Trustees considered a range of qualitative and quantitative factors, including:

- the strength of the employer’s covenant and how this may change in the near/medium future;
- 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; and
- the level of expected return and expected level of risk (as measured by Value at Risk (“VaR”)), now and as the strategy evolves.

2. Approach to managing and monitoring investment risks

The Trustees consider that there are a number of different types of investment risk that are important for the Scheme. These include, but are not limited to:

2.1. Risk of inadequate returns

A key objective of the Trustees is that, over the long-term, the Scheme should have adequate assets to meet its liabilities as they fall due. The Trustees therefore invest the assets of the Scheme in order to give a high likelihood of achieving this objective. There is also a risk that the performance of the Scheme’s assets and liabilities diverges in certain financial and economic conditions in the short term. This risk has been taken into account in setting the investment strategy and is monitored by the Trustees on a regular basis.

2.2. 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, could materially adversely affect the Scheme’s assets. The Trustees 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 and is monitored by the Trustees on a regular basis.

2.3. Investment manager risk

This is the risk that an investment manager fails to meet its investment objectives. Prior to appointing an investment manager, the Trustees receive written advice from a suitably qualified individual, and will typically undertake an investment manager selection exercise. The Trustees monitor the investment managers on a regular basis to ensure they remain appropriate for their selected mandates.

2.4. 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. The Trustees 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.

2.5. Environmental, social and governance (ESG) risks

Environmental, social and corporate governance (ESG) factors are sources of risk to the Scheme's investments which could be financially material, over both the short and longer term. These potentially include risks relating to factors such as climate change, unsustainable business practices, and unsound corporate governance. The Trustees seek to appoint investment managers who will manage these risks appropriately on their behalf and from time to time reviews how these risks are being managed in practice.

In addition, the Trustees invest in developed market equity funds that have an explicit objective to reduce the overall carbon intensity of the portfolios through time.

2.6. Credit risk

This is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation. The Scheme is subject to credit risk because it invests in bonds and derivative contracts via pooled funds.

The Trustees manage the Scheme's exposure to credit risk by investing in pooled funds that have a diversified exposure to different credit issuers and counterparties, investing primarily in bonds that are classified as investment grade and that manage appropriate collateralisation processes.

2.7. Counterparty risk

This is the risk that one party to a contract (such as a derivative) causes a financial loss to the other party by failing to discharge a contractual obligation. This risk applies in particular for those contracts that are traded directly between parties, rather than traded on a central exchange.

In particular, the Trustees invests in interest rate, inflation and credit default swaps indirectly via their allocation to synthetic credit and LDI. Counterparty risk is managed within the funds through careful initial selection and ongoing monitoring of trading counterparties, counterparty diversification and a robust process of daily collateralisation of each contract, to ensure that counterparty risk is limited, as far as possible, to one day's market movements.

2.8. Collateral adequacy risk

The Scheme is invested in leveraged LDI arrangements to provide protection ("hedging") against adverse changes in interest rates and inflation expectations. In addition, the Scheme is invested in leveraged synthetic credit arrangements to provide efficient exposure to credit markets. The manager may from time to time call for additional cash to be paid to these portfolios in order to support a given level of leverage.

Collateral adequacy risk is the risk that the Trustees when requested to do so will not be able to post additional cash to the funds within the required timeframe. A potential consequence of this risk is that the Scheme's interest rate and inflation hedging or credit exposure could be reduced and that the Scheme's funding level could suffer subsequently as a result. In order to manage this risk, the Trustees ensure that the Scheme has a sufficient allocation to cash and other highly liquid assets which can be readily realised, so that cash can be posted to the manager at short notice.

2.9. Currency risk

As the Scheme's liabilities are denominated in Sterling, any non-Sterling currency exposure within the assets presents additional 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. The Trustees consider the overseas currency exposure in the context of the overall investment strategy, and believe that the currency exposure that exists diversifies the strategy and is appropriate. Furthermore, the Trustees manage the amount of currency risk by either investing in pooled funds that aim to hedge overseas currency exposure or by delegating responsibility to the investment managers to manage the overseas currency exposure.

2.10. 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 and interest rate or inflation swaps via pooled funds. However, this interest rate and inflation exposure hedges part of the corresponding risks associated with the Scheme's liabilities. The net effect is designed to reduce the volatility of the funding level, and therefore the Trustees believe that it is appropriate to have exposures to these risks in this manner and to review them on a regular basis.

2.11. Other price risk

This is 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 credit risk, currency risk or interest rate and inflation risk).

The Trustees monitor this risk on a regular basis, looking at the performance of the Scheme as a whole as well as each individual portfolio. The Trustees believe that the Scheme's assets are adequately diversified between different asset classes and within each asset class to manage this risk.

The exposure to other price risk within the investments will vary over time depending on how the managers change the underlying asset allocation to reflect their market views.

3. Other non-investment risks

The Trustees recognise that there are other, non-investment, risks faced by the Scheme, and takes these into consideration as far as practical in setting the Scheme's investment arrangements as part of their assessment of the other aspects of the Scheme's Integrated Risk Management ("IRM") framework.

Examples include:

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

Together, the investment and non-investment risks give rise generally to funding risk. This is the risk that the Scheme's funding position falls below what is considered an appropriate level.

The Trustees regularly review progress towards the Scheme's funding target, both in the long-term as well as against short-term milestones, comparing the actual versus expected funding level.

By understanding and considering the key risks that contribute to funding risk, the Trustees believe that they have appropriately addressed and are positioned to manage this general risk.

Investment manager arrangements

Details of the investment managers, their objectives, and investment guidelines are set out below.

1. Legal & General Investment Management ("L&G")

The Trustees have selected L&G to passively manage a global developed market equity mandate and an emerging market equity mandate (together the "Passive Equity Portfolio"). The Trustees have also selected L&G to manage a long-lease property mandate, a synthetic credit mandate, and an LDI mandate for the Scheme. Each of these mandates are accessed via pooled funds that are priced weekly, open-ended and unlisted.

1.1. Passive Equity Portfolio

L&G manages the portfolio in line with a benchmark and tolerance ranges stated in the table below.

Portfolio	Benchmark allocation	Range (+ / -)
Global Developed Market (Low Carbon) Equities	75%	5%
Emerging Market Equities	25%	5%

1.1.1. Global Developed Market (Low Carbon) Equities

The target allocation between hedged and un-hedged global developed market equities is summarised in the table below.

Fund	Benchmark allocation	Range (+ / -)	Benchmark	Performance objective
Low Carbon Transition Developed Markets Equity Index Fund	50%	5%	Solactive L&G Low Carbon Transition Developed Markets Index	To track the benchmark index performance (less withholding tax if applicable) to within +/-0.5% p.a. for two years out of three
As above – GBP Hedged	50%	5%	As above – GBP hedged	

1.1.2. Emerging Market Equities

The Scheme invests in emerging market equities via the L&G World Emerging Markets Equity Index Fund. The objective of this fund is to track the performance of the FTSE Emerging Index (less withholding tax if applicable) to within +/-1.5% pa for two years out of three.

1.2. Long Lease Property Portfolio

The Scheme invests in UK property via the L&G Limited Price Inflation ("LPI") Income Property Fund. The objective of this fund is to provide an income stream that rises in line with LPI (Retail Price Index between 0% pa and 5% pa).

1.3. Synthetic Credit Portfolio

The Scheme invests in synthetic credit via the L&G Synthetic Leveraged Credit Fund. The objective of this fund is to provide leveraged exposure to investment grade credit spreads. This is achieved by investing in 10-year investment grade US (CDX) and European (iTraxx) credit default swap indices.

1.4. LDI Portfolio

The Scheme invests in LDI via the L&G Matching Core Funds. The objective of these funds is to provide leveraged exposure to changes in interest rate and inflation expectations.

The Scheme also invests in the L&G Sterling Liquidity Fund, which acts as collateral support for the LDI and synthetic credit allocations.

2. Schroder Pension Management Limited ("Schroder") DGF

The Trustees have selected Schroder to manage part of the Scheme's DGF portfolio, with assets invested in the Schroder Life Diversified Growth Fund. The objective of this fund is to outperform the return of the Retail Price Index ("RPI") by 5% pa (after the deduction of management fees) over longer periods. The fund is priced daily, open-ended and is unlisted.

3. Aberdeen Standard Investments Limited ("Standard Life") DGF

The Trustees have selected Standard Life to manage part of the Scheme's DGF portfolio, with assets invested in the Global Absolute Return Strategies Fund. The objective of this fund is to outperform the return of UK 6 month LIBOR by 5% pa (before the deduction of management fees) over longer periods. The fund is priced daily, open-ended and is unlisted.

4. Additional Voluntary Contributions ("AVCs")

AVCs are invested via arrangements with Norwich Union, Clerical Medical and Utmost Life and Pensions (previously Equitable Life Assurance Society).