

IMPLEMENTATION STATEMENT FOR THE STABLE EMPLOYEES PENSION PLAN

1. Introduction

This is the Implementation Statement for the Stable Employees Pension Plan ('the Plan') and reflects the position on 28 February 2023. This Implementation Statement should be read in conjunction with the Statement of Investment Principles (SIP) and is an integral part of the SIP.

The SIP was last reviewed and updated in September 2019. It is considered still appropriate and reflects the Trustee policies relating to responsible investment, including both financial and non-financial matters that the Trustee considered. This included Environmental, Social and Governance (ESG) considerations. Stewardship was also considered, i.e. voting and engagement, together with the ability of the Trustee to influence the actions of their investment managers.

The selection of investment managers is considered, including their objectives, fees and their basis of charging and how that aligns with the interests of the Plan, ensuring there are no conflicts of interest. The duration of each manager appointment is also considered, together with the ability to terminate their appointment, and any conditions of that termination, should this prove necessary.

The principal employer, The National Trainers Federation, had requested the winding up of the Plan. The Trustee passed a written resolution on 29 March 2019 to determine the wind up of the Plan.

2. Investment Objective

This is effectively outlined in the SIP and remains as stated with specifically the achievement of a rate of return consistent with the benefit that a member may select at retirement. In respect of the bulk membership the Trustee seeks a fund that could maintain real value and be less susceptible to volatile markets.

3. Investment Strategy

The Trustee continues to implement the strategy as outlined in the SIP and as updated from time to time.

4. Setting the Investment Arrangements

In managing the assets of the Plan, the Trustee owns policies of assurance. As the Grantee of the policy the Trustee has the benefit of the protection offered under the Financial Services Compensation Scheme (FSCS) and the terms of the specific policy of assurance.

Mobius Life

The Trustee holds a long term insurance policy with Mobius Life as a part of the Mobius Life long term business fund. As Grantee under the policy the Trustee may pay a premium to Mobius Life who will allocate units to the policy. The allocation of units is notional and references to both units and funds are solely for the purpose of calculating benefits under the policy. Neither the Grantee (which is the Trustee) nor any other person has any right or interest in the units, the funds or any other specific assets or income of Mobius Life by virtue of the policy.

The wide range of asset classes available to the Trustee are considered as is the ease of access to institutional style investment management funds at an acceptable annual management charge. During the past 12 months the Trustee has received information and advice on how to achieve their objectives and how to access appropriate investment funds in a secure way.

5. Implementation of the Investment Arrangements

The arrangements are assessed on an ongoing basis at Trustee meetings and by the Trustee's Investment Adviser. This may in part be by face to face meetings where it is practical to do so.

The Trustee is aware of the need to consider the impact of costs and value for money on the long-term performance of the investments in the pooled funds. In an effort to reduce cost and the risks associated with 'active' fund management, the Trustee has invested some of the Plan's assets in passive or index funds.

The funds are accessed via the Mobius Life investment platform using a Trustee Investment Plan which is technically a policy of assurance. This route of access avoids de-minimis fees and can benefit from aggregation discounts on annual management charges. Reporting is co-ordinated and this represents a significant benefit to the Plan.

6. Realisation of Investments

Investments are reviewed on a regular basis in the light of net cash flow requirements. The pooled funds may be accessed on a daily basis and the Trustee believes that this supplies adequate liquidity for the Plan.

7. Investment Governance and Financially Material Considerations

The matter of investment and investment governance in a widest sense is taken seriously by those who manage the Plan (The Trustee). To this end the Plan has a Statement of Investment Principles (SIP), which is considered and reviewed periodically as appropriate.

The current SIP was agreed in 2019 and that followed in-depth consideration of the environmental, social and governance requirements, considering both financial and non-financial aspects, in respect to the asset types as required in the long term for the Plan as it matures. The Plan is investing appropriately against this background and there has not been a need to make further amendments although the Trustee has kept this position under review.

Those that manage the Plan collectively have the necessary qualifications and experience appropriate to a Plan of this size. They meet regularly as required by the business of the Plan, including investment business. Investment matters are on the agenda for all Trustee regular meetings. The Plan has access to professional advisers including, but not limited, to an Investment Adviser, Actuary, and Lawyer.

8. Approach to Non-Financial Matters

The Plan invests in pooled pension funds. This is appropriate to a Plan of this size and brings added security in that the assets are covered by the Financial Services Compensation Scheme (FSCS).

The Plan will always prefer an investment that is beneficial to society and the environment over one that is not. In making such a statement the managers of the

Plan are noting that by using pooled investment vehicles they are not the direct owners of the underlying assets. They do however have access (sometimes limited by availability of information) to a copy of the content of the underlying portfolios of the pooled investment managers.

9. Strategic Asset Allocation

During the past 12 months the Plan has followed the allocation as outlined in the SIP and where there has been any variation this has been intentional. Those that manage the Plan continue to consider that the asset allocation is appropriate and have considered this at their meetings in the year.

10. Mandate Parameters

The Plan has selected pooled pension funds with specific objectives. Each of the pooled funds that the Plan is invested in has its own specific objective and in selecting these funds the manager of the Plan received investment advice from a financial adviser of appropriate standing and experience and working for an organisation registered with the Financial Conduct Authority.

When reviewing the investments during the year, it was noted that the pooled funds were being managed to their objectives and that the results were as the Plan expected. The financial standing of the managers of the pooled funds has been considered and noted that it continues to be appropriate. The managers of the pooled funds that the Plan participates in are required to report to the Prudential Regulatory Authority (PRA) who in turn supervise the solvency of these managers on behalf of the Bank of England.

The Plan has considered this position during the year and remains comfortable with the approach in place, including the capital structure and financial standing of the investment managers that the Plan invests with. Specifically, the Trustee takes considerable comfort at investing via a policy of assurance and the protections that brings.

11. Voting Rights and Description of Voting Behaviour During the Year

Participants in pooled investment funds do not generally acquire rights over the underlying holdings of the pool. There is no direct relationship between the Plan and the companies whose shares are held within the pooled investment funds that the Trustee is using. In effect this means that the manager of the pool exercises voting rights on the Trustee's behalf (as a participant in the pool) but without any obligation to consult with the Trustee. The Plan does not use a proxy voting service, in practice it does not have the right to exercise votes at the general meetings of companies held within the pooled investment funds. Generally, other than for matters of financial reconstruction, holders of gilts, bonds, physical property and other alternative investments may not have voting rights.

Where the Plan holds units of investment in pooled equity funds the Plan is able to see how the manager has voted in the summary stewardship reports that the manager may produce for information. These matters are currently only reported at overall manager level and not in a specific way in respect to the funds that we invest in. This may change in the future and the Plan is aware that there are many initiatives in the investment markets generally to improve access information and reporting in this area.

Other than via our investment consultant, it is challenging for the Plan to influence the manager of a pooled fund on matters of voting for individual companies. The Plan does however take its responsibilities seriously in this area and notes that it always has the option to divest from the manager if, in the view of the Plan, expressed by those who manage it, this is deemed appropriate. Set against this is, an overall fiduciary responsibility of the Trustee is the management of the Plan assets.

The Trustee expects managers to provide further summary stewardship reports that highlight key voting issues, particularly around matters of diversity and the environment as regards the underlying holdings in the relevant pooled fund portfolio. Such reports are available for example from Legal and General at a high level by accessing

https://www.lgim.com/landg-assets/lgim/_document-library/capabilities/lgim-uk-corporate-governance-and-responsible-investment-policy.pdf

<https://www.blackrock.com/uk/individual/about-us/sustainability-resilience-research?siteEntryPassthrough=true&cid=ppc:apollo20:Google:brand:uk&gclid=EAIaIQobCh>

The Trustee considers such information in making their decisions under the policy of assurance that they own.

12. The Trustee

At each trustee meeting, where their Investment Adviser is present, the Trustee has received an investment presentation on the strategy that they are pursuing and the pooled funds that they participate in. This has included some comment on ESG and where available the wider voting record of their investment manager.

The Trustee group includes experienced individuals with relevant qualifications and practical working experience of investment matters and governance. This method of operation facilitates an excellent understanding at Plan level of the requirements when exercising 'good governance'.

13. Trustee Knowledge and Understanding

Winterbourne Trustee Services is a specialist professional Independent Trustee and is the sole trustee of the Plan. As a firm of professional trustees, Winterbourne brings its long experience and specialist pensions knowledge to what is now a very complex and increasingly legislated area.

14. Processes around Managing Plan Investments

Having set a strategic asset allocation this process has revolved mainly around managing cash flow during the year. In this respect, where funds have been required for additional cashflow, retirements or member transfers, the Trustee has taken appropriate advice and sold investments to provide the necessary liquidity.

15. Holding Advisers and Managers to Account

The Plan is managed by the Trustee and in turn take advice where required. Those that act as advisers to the Plan have objectives to deliver a service, as required, and the Trustee group consider the success of this on an ongoing basis. The Investment Adviser has objectives in place that were reviewed in 2021 and will again be reviewed in 2024.

No action has been necessary during this year in respect of shortcomings of advisers or service providers to the Plan. The Trustee notes that the management of a Plan such as this can be a challenging matter, and that in particular budgets must be appropriate. These matters are regularly considered and the Trustee considers that overall the Plan functions well, achieving good value from its service providers.

16. Manager Selection, Review and Monitoring

The Plan has made no change in its holding of pooled funds during the year. This is intentional. Change can be relatively expensive due to implicit dealing costs in the underlying assets and although not fully transparent such costs are apparent in wholesale rearrangement of assets. The Trustee seeks to avoid such costs.

17. Transparency

The assets held by the Plan are transparent and it is anticipated that in future years all transaction costs on the underlying assets of the pooled funds that the Plan owns assets in will be available for general publication. For monetary instruments such as gilts and fixed interest holdings such costs are implicit in the purchase price of the underlying asset and so are unlikely to be available. We are aware that the investment industry is considering how to report on such matters and are therefore waiting for more information in this area.

18. Conclusion

The Plan has managed its assets successfully throughout the period under review. This Implementation Statement should be read in conjunction with the SIP and is supported by ESG and voting information as supplied to the Investment Adviser for the Plan by the managers of the pooled funds that the Plan participates in.

19. Further Information

If further information is required on any of the matters covered in the Implementation Statement please contact the Trustee, Winterbourne Trustee Services.

August 2023