

14. IMPLEMENTATION STATEMENT

Ransomes Pension Scheme

Implementation Statement for the year ending 31 December 2020

Introduction

This implementation statement has been prepared by the Trustee of the Ransomes Pension Scheme (the Scheme). The Scheme provides benefits calculated on a defined benefit (DB) basis for members in the DB Section and benefits calculated on a defined contribution (DC) basis for members in the Contracted Out Money Purchase Scheme (COMPS) Section.

The statement:

- sets out how, and the extent to which, the policies set out in the Statement of Investment Principles (the SIP) have been followed during the year;
- describes any review of the SIP, including an explanation of any changes made; and
- describes the voting behaviour by, or on behalf of, the Trustee over the same period.

The Trustee's policies contained in the SIP are underpinned by their investor beliefs, which have been developed in consultation with their investment consultant.

Trustee's overall assessment

In the opinion of the Trustee, the policies as set out in the SIP have been followed during the year ending 31 December 2020.

Review of the SIP

The Trustee's policies have been developed over time by the Trustee in conjunction with their investment consultant and are reviewed and updated periodically and at least every three years.

The SIP was reviewed as a result of changes in legislation effective from 1 October 2019.

This review resulted in the following policies being updated in September 2019:

- Policy in relation to financially material considerations, including environmental, social and governance (ESG) factors.
- Policy in relation to non-financial matters.
- Policy in relation to stewardship.

The SIP was reviewed during the scheme year as a result of changes in legislation effective from 1 October 2020. This review resulted in the Trustee's policy in relation to their arrangements with their investment managers being updated in June 2020.

Policy in relation to the kinds of investments to be held

The Trustee has full regard to their investment powers under the Trust Deed and Rules and the suitability of the various types of investments, the need to diversify, the custodianship of assets and any self-investment.

Implementation Statement for the year ending 31 December 2020

Investment strategy and objectives

Investment strategy (DB Section)

The Scheme's investment strategy has been agreed by the Trustee having taken into consideration advice from the investment consultant and takes due account of the Scheme's liability profile along with the level of disclosed surplus or deficit.

The Trustee's agreed investment strategy is based on consideration of the Scheme's liability profile, the required investment return and the returns expected from the various asset classes over the long-term. Long-term returns from equities are expected to exceed the returns from bonds and cash, although returns and capital values may demonstrate higher volatility. The Trustee is prepared to accept this higher volatility in order to aim to achieve the overall investment objectives.

Policy in relation to the balance between various kinds of investments and the realisation of investments (DB Section)

The appointed investment managers will hold a diversified mix of investments in line with their agreed benchmark and within their discretion to diverge from the benchmark. Within each major market each manager will maintain a diversified portfolio of securities.

In the event of an unexpected need to liquidate all or part of the assets of the portfolio, the Trustee requires the investment managers to be able to liquidate the Scheme's investments in a reasonable timescale by reference to the market conditions existing at the time the disposal is required and subject to the best interests of the Scheme. The majority of the assets are not expected to take an undue time to liquidate.

During the year, the Trustee discussed the performance of the asset classes invested in and the attributes of the asset classes that contributed to that.

During the year, the Trustee has not made any changes to the mix of investments.

Policy in relation to the expected return on investments (DB Section)

The investment strategy is believed to be capable of exceeding, in the long run, the overall required rate of return assumed in the Scheme Actuary's published actuarial valuation report in order to reach then maintain a fully funded status under the agreed assumptions.

COMPS Section

The Scheme provides members in the COMPS Section with a range of funds in which to invest. The fund range has been designed having taken due regard to the membership profile of the Scheme, including consideration of the ways members may choose to use their savings to fund their retirement.

The objective of the investment options available is to allow members to tailor their investments based on their individual investment requirements, while avoiding complexity. The range should assist members in achieving the following:

- maximising the value of retirement benefits;
- protecting the value of benefits in the years approaching retirement against equity market falls and (should they decide to purchase an annuity) fluctuations in annuity costs; and
- tailoring a member's investments to meet his or her own needs, and to how the member intends to make use of their benefits at and through retirement.

Implementation Statement for the year ending 31 December 2020

In considering these factors, the Trustee believes they have complied with their SIP regarding investment considerations.

Policy in relation to the balance between various kinds of investments and the realisation of investments (COMPS Section)

The investment managers will maintain a diversified portfolio of stocks or bonds within each of the funds offered under the Scheme.

Investments within the COMPS Section are subject to the same liquidity requirements as the DB Section of the Scheme.

The funds in the COMPS Section did not experience any liquidity issues that had any impact on members during the year.

During the year, the Trustee monitored the performance of the funds invested in and the attributes of the asset classes that contributed to that.

Suitability of Investments (COMPS Section)

The Trustee is satisfied that the funds offered to members and the appointed investment managers are consistent with the objectives of the Scheme, particularly in relation to diversification, risk, expected return and liquidity.

Risk capacity and risk appetite

Policy in relation to risks (DB Section)

Although the Trustee acknowledges that the main risk is that the Scheme will have insufficient assets to meet its liabilities, the Trustee recognises other contributory risks, including the following. Namely the risk:

- associated with the differences in the sensitivity of asset and liability values to changes in financial and demographic factors.
- of the Scheme having insufficient liquid assets to meet its immediate liabilities.
- of the investment managers failing to achieve the required rate of return.
- of insufficient diversification of investments.
- of failure of the Scheme's Sponsoring Employer to meet its obligations.

The Trustee manages and measures these risks on a regular basis via actuarial and investment reviews, and in the setting of investment objectives and strategy.

The Trustee undertakes monitoring of the investment managers' performance against their targets and objectives on a regular basis. Four monitoring reports were received during the year. These did not highlight any significant concerns over the level of risk being run within the Scheme.

Policy in relation to risks (COMPS Section)

The Trustee has considered risk from a number of perspectives. These are the risk that:

- the investment return over members' working lives may not keep pace with inflation and does not, therefore, secure an adequate retirement income,
- investment market movements in the period prior to retirement lead to a substantial reduction in the anticipated level of pension or other retirement income,
- investment market movements in the period just prior to retirement lead to a substantial reduction in the anticipated cash lump sum benefit,

Implementation Statement for the year ending 31 December 2020

- fees and transaction costs reduce the return achieved by members by an inappropriate extent.

The investment options have been chosen to provide members with the flexibility to address these risks for themselves.

The Trustee monitors these risks through the annual performance monitoring reports.

One monitoring report was received during the year. The report did not highlight any significant concerns over the level of risk being run within the Scheme.

The self-select funds available have been chosen to provide members with the flexibility to address these risks for themselves.

Stewardship in relation to the Scheme assets

Policies in relation to investment manager arrangements

The Scheme's assets are invested in pooled funds which have their own policies and objectives and charge a fee, set by the investment manager, for their services. The Trustee has very limited to no influence over the objectives of these funds or the fees they charge (although fee discounts can be negotiated in certain circumstances).

There have been no changes to the benchmark/objectives of the funds in which the Scheme invests over the year.

The Trustee, in conjunction with its investment consultant, has processes in place to review investment turnover costs incurred by the Scheme on an annual basis. The Trustee receives a report which includes the turnover costs incurred by the investment managers used by the Scheme.

The Trustee does not explicitly monitor turnover, set target turnover or turnover ranges. The Trustee believes that the investment managers should follow their stated approach with a focus on risk and net return, rather than on turnover. In addition, the individual mandates are unique and bespoke in nature and there is the potential for markets to change significantly over a short period of time.

In addition, the Trustee receives information on any trading costs incurred as part of asset transfer work within either the DB or the COMPS Section, as and when these occur. The exercise is only undertaken if the expected benefits outweigh the expected costs. The Trustee notes that, in respect of the COMPS Section, trading costs are also incurred in respect of member switches (including within the lifestyle strategy).

There were two Trustee-led switching exercise during the year, and information on switching costs incurred was included in the 26 March and the 8 October pre-transfer advice from the investment consultant.

The investment managers have invested the assets within their portfolio in a manner that is consistent with the guidelines and constraints set out in their appointment documentation. In return the Trustee has paid their investment managers a fee which is a fixed percentage of assets under management.

The investment consultant has reviewed and evaluated the investment managers on behalf of the Trustee, including performance reviews, manager oversight meetings and operational due diligence reviews.

Implementation Statement for the year ending 31 December 2020

Investment manager monitoring and changes

During the year the Trustee received quarterly and annual reports from the investment consultant for the DB and COMPS Sections, respectively, examining the performance of the pooled funds used.

There have been no changes to the Scheme's existing investment manager arrangements.

Appropriate written advice will be taken from the investment consultant before the review, appointment or removal of the investment managers.

Stewardship of investments

The Trustee has a fiduciary duty to consider their approach to the stewardship of the investments, to maximise financial returns, within an acceptable level of risk, for the benefit of members and beneficiaries over the long term. The Trustee can promote an investment's long term success through monitoring, engagement and/or voting, either directly or through their investment managers.

The Trustee, in conjunction with its investment consultant, appoints its investment managers and chooses the specific pooled fund to use in order to meet specific Scheme policies. It expects that its investment managers make decisions based on assessments about the financial performance of underlying investments, and that they engage with issuers of debt or equity to improve their performance (and thereby the Scheme's performance) over an appropriate time horizon.

The Trustee also expects its investment managers to take non-financial matters into account as long as the decision does not involve a risk of detriment to members' financial interests.

During the year, the Trustees received an update on regulatory information from their investment consultant on ESG issues, including stewardship and engagement.

Stewardship - monitoring and engagement

The Trustee recognises that investment managers' ability to influence the companies in which they invest will depend on the nature of the investment.

The Trustee's policy is to delegate responsibility for engagement and monitoring investee companies to the investment managers and expects the investment managers to use their discretion to maximise financial returns for members and others over the long term.

The Trustee's policy is also to delegate responsibility for the exercising of rights (including voting rights) attaching to investments to the investment managers and to encourage the managers to exercise those rights. The investment managers are expected to provide regular reports for the Trustee detailing their voting activity.

Investment manager engagement policies

The Scheme's investment managers are expected to have developed and publicly disclosed an engagement policy. This policy, amongst other things, provides the Trustee with information on how each investment manager engages in dialogue with the companies it invests in and how it exercises voting rights. It also provides details on the investment approach taken by the investment manager when considering relevant factors of the investee companies, such as strategy, financial and non-financial performance and risk, and applicable social, environmental and corporate governance aspects.

Implementation Statement for the year ending 31 December 2020

Links to each investment manager's engagement policy or suitable alternative is provided in the Appendix.

These policies are publicly available on each investment manager's websites.

Exercising rights and responsibilities

The investment managers are expected to disclose annually a general description of their voting behaviour, an explanation of the most significant votes cast and report on the use of proxy voting advisers.

All investment managers use proxy advisers for the purposes of providing research, advice or voting recommendations that relate to the exercise of voting rights, except for Independent Franchise Partners.

The Trustee does not carry out a detailed review of the votes cast by or on behalf of their investment managers but rely on the requirement for their investment managers to provide a high-level analysis of their voting behaviour.

The Trustee considers the proportion of votes cast, and the proportion of votes against management and believe this to be an important (but not the only) consideration of investor behaviour.

The latest available information provided by the investment managers is as follows:

Voting behaviour			
Investment Manager	Period	Proportion of votes cast	Proportion of votes against management
BlackRock Investment Management	12 months to 30 Jun 2019	Not supplied	8%
Baillie Gifford	12 months to 31 Mar 2020	100%	3%
Independent Franchise Partners	12 months to 31 Dec 2019	93%	13%
Friends Life		N/A	N/A
Aegon		N/A	N/A
Utmost Life and Pensions		N/A	N/A

Trustee's engagement

The Trustee has reviewed the investment managers' engagement and voting activity over the period and have found them to be acceptable at the current time.

Implementation Statement for the year ending 31 December 2020

Appendix

Links to the Engagement Policies for the investment managers can be found here:

Investment manager	Engagement Policy (or suitable alternative)
BlackRock Investment Management	https://www.blackrock.com/corporate/literature/fact-sheet/blk-responsible-investment-engprinciples-global.pdf
Aberdeen Standard Investments	https://www.aberdeenstandard.com/en/responsible-investing
Baillie Gifford	https://www.bailliegifford.com/en/uk/institutional-investor/literature-library/corporate-governance/governance-and-sustainability-principles-and-guidelines/
Independent Franchise Partners	https://db164s6jwq5bl.cloudfront.net/assets/Franchise%20Partners%20Stewardship%20Policy%20August%202020-8f7fac40ec670be73c2df96ee8f69daed4f3544afe4c9c31e0e08a657fa33f26.pdf