

# Chairman's Statement

## Annual Chairman's Statement for the Visa Europe Pension Plan

From 6 April 2015, the Occupational Pension Schemes (Charges and Governance) Regulations 2015 (the "Regulations") introduced minimum governance standards that apply to all trust-based Defined Contribution (DC) schemes, including defined benefit schemes with Additional Voluntary Contribution (AVC) arrangements, where the AVCs are not the only money purchase benefits.

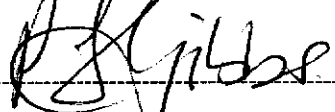
This statement sets out how the Visa Europe Pension Plan (the "Plan") has met these governance standards over the period from **1 October 2018 to 30 September 2019** and covers governance and charge disclosures in relation to the following:

1. The default arrangement;
2. Processing of core financial transactions;
3. Member borne charges and transaction costs;
4. Assessing Value for Members; and
5. Trustee knowledge and understanding.

The Trustee believes that good governance is key to deliver better outcomes for Plan members. The Trustee is committed to having high governance standards and regularly review and update their governance processes and procedures to make sure that these meet industry best practice.

Overall, the Trustee is confident that all requirements of the Regulations, as they apply, are being met, and in many areas exceeded, in the interests of members.

Signed on behalf of the Trustee of the Visa Europe Pension Plan



Chairman of the Trustee

Date of signing 28<sup>th</sup> April 2020.

## 1. The Default Arrangement

The Plan offers members three lifestyle arrangements:

- Options Open;
- Lump Sum Withdrawal; and,
- Annuity Purchase.

Members who join the Plan and do not make an active investment choice for their contributions are placed into the default investment arrangement. The Trustee has chosen the Options Open Lifestyle as the default investment arrangement for the Plan.

The Options Open Lifestyle's pre-retirement investment mix represents the most neutral option where the member has not made a specific choice to align their Member Account to either cash or annuity purchase. The Trustee therefore views it as being the one most appropriate for the majority of members who have not made a decision on how they will want to take their benefits at retirement.

The Options Open Lifestyle, initially invests in higher risk assets such as equity and property to give members' exposure to high growth potential and gradually shifts into lower risk assets. The Options Open Lifestyle is composed of:

- A growth phase including two white labelled funds: Visa Global Equity Fund (90%) and Visa Property Fund (10%) comprised of a range of passive and active underlying funds; and
- A de-risking phase beginning 15 years prior to a member's selected retirement age, which gradually sees a member's funds transition into lower investment risk assets. The aim is to provide some protection to members' accumulated savings.

The latest Statement of Investment Principles (SIP) for the Plan which governs decisions about investments in the Plan, including the specific details of the default investment arrangement, other lifestyle strategies and freestyle funds, is appended to this statement.

A review of the Plan's investment strategy (including the default arrangement) is undertaken at least every three years. The last review was completed in February 2018 with changes implemented in September 2018.

The latest investment strategy review included a review of the Plan's membership profile at that time and the presumed needs of the Plan's members. The analysis took into account factors such as age, salary, contribution level, accumulated fund values and term to retirement and the Trustee compared the expected outcomes at retirement for different member groups across a number of alternative investment strategies.

Following this analysis, the Trustee opted to retain the Options Open Lifestyle as the default arrangement for the Plan. The Trustee also worked with their investment advisers in order to improve the lifestyle arrangements, including the default arrangement, with the aim of enhancing members' risk adjusted returns through to retirement and the projected value of members' at-retirement savings.

The next investment strategy review is due to commence in Q4 2020.

The Trustee, with support from their investment advisers, also carries out regular investment monitoring. Performance of all funds, including those used within the default arrangement, is reviewed on a quarterly basis. This review includes an assessment of fund performance against stated benchmarks and performance targets over both short and longer-term periods, as well as utilising a red-amber-green rating system to help flag any areas of concerns. The Plan's actively managed multi-asset fund is also reviewed against its peer group on a quarterly basis.

## 2. Processing of Core Financial Transactions

The Trustee has a specific duty to ensure that core financial transactions (including the investment of contributions, transfer of member assets into and out of the Plan, transfers between different investments within the Plan and payments to and in respect of members/beneficiaries) are processed promptly and accurately. The Trustee has appointed Buck to provide administration services and have delegated responsibility for processing these transactions to them.

The Trustee is satisfied that the requisite standards of promptness and accuracy have been met, including where functions have been delegated to Buck.

To enable the Trustee to monitor the processing of core financial transactions, Buck provide quarterly administration reports covering key aspects of the administration including special projects, member statistics, contribution monitoring, a schedule of transactions and performance against the service levels agreed.

The service level agreement in place with Buck covers various time critical processes, including contributions, fund value quotation, investment switches and member events (such as retirements and transfers). The turnaround times set within the service level agreement depend on the criticality of the activity, ranging from five business days for time critical processes such as investment switches and 15 business days for more complex member enquiries. The target is set at 100% for completing processes within the agreed service level.

The administration reports are reviewed by the Trustee at quarterly meetings in order to monitor compliance and there is regular contact with Buck in order to ensure any issues are dealt with on a timely basis.

Buck have confirmed that there are processes in place for each core financial transaction to ensure that all Plan transactions are processed in a timely and accurate manner. For example, Buck check contributions have been received on time and carry out monthly unit reconciliations.

The administration team at Buck is subject to internal audits as well as an annual external audit, which includes a sample of financial transactions. All work processes are documented and subject to a peer review process, with work being calculated and independently checked by another member of the team.

The Trustee has also received a copy of Buck's internal controls report and is comfortable that core financial transactions are processed promptly and accurately.

Buck's administration team achieved performance against the service level agreement that ranged between 95.4% and 99.0% for DC specific administration over the year ended 30 September 2019.

The Trustee is pleased to report that there were no material administration issues over the year. Where there were minor issues, the Trustee is satisfied that these were promptly dealt with and appropriate steps were taken in order to mitigate future occurrences.

### AVC policies

The Plan has a number of legacy AVC policies in place with Aviva, Scottish Widows, Zurich and Equitable Life<sup>1</sup>.

The Aviva and Scottish Widows arrangements are administered through Buck and as above, the Trustee is comfortable that there are sufficient processes in place to ensure that core financial transactions are processed promptly and accurately. The Trustee has also received internal control reports from these providers and is comfortable there are suitable policies in place to ensure that financial transactions are processed as expected.

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<sup>1</sup> As of 1 January 2020, policies held with Equitable Life were transferred to Utmost Life and Pensions.

The Trustee has requested specific information relating to core financial transactions from Equitable Life (now Utmost Life and Pensions) and Zurich. At the time of writing, the requested information was still awaited from these providers. However, the Trustee has received internal control reports from these AVC providers and is comfortable there are suitable policies in place to ensure that core financial transactions are processed as expected. The Trustee, along with their advisers, is continuing to request specific information relating to the core financial transactions from Utmost Life and Pensions and Zurich and will continue to do so until received.

### 3. Member Borne Charges and Transaction costs

The Trustee is required to monitor the costs associated with the Plan, which are paid by the members and to assess whether these represent good value for members.

These costs comprise charges and transaction costs.

**Charges**, such as the Annual Management Charge ("AMC" – the annual fee charged by the investment manager for investing in a fund), as well as additional expenses together comprise the Total Expense Ratio (TER), which is the amount deducted as a percentage of members' funds as an explicit charge.

The TER information is readily available via the member portal.

**Transaction costs** are costs which are incurred within the day to day management of the assets by the fund manager. This covers such things as the cost of buying and selling securities within the fund. Transaction costs are incurred on an on-going basis and are implicit within the performance of the fund.

Transaction costs are largely the result of buying and selling investments within a fund, therefore actively managed funds with a high turnover of holdings, or those invested in less liquid assets (such as the Aviva Property Fund) will usually have higher transaction costs than passively managed funds (such as the BlackRock Aquila MSCI World Index Funds) that invest in more liquid assets.

As defined by the Financial Conduct Authority, explicit transaction costs are the costs that are directly charged to or paid by the fund and may include taxes and levies (such as stamp duty), broker commissions (fees charged by the executing broker in order to buy and sell investments) and costs of borrowing or lending securities.

Implicit transaction costs are calculated as the difference between the actual price paid (execution price) and the quoted 'mid-market price' at the time of the order was placed (arrival price). This method, although reasonable if observed over a long period of time, can result in a volatile measure from one year to another and can even result in a profit, known as 'negative costs'. This can happen, for example when buying an asset, if the actual price paid ends up being lower than the mid-market price at the time of placing the order.

The transaction costs calculated by the providers, using the method prescribed by the Regulator, has resulted in negative costs (i.e. a profit) for some funds held by members during the period of review.

The transaction costs, as defined in regulation 2(1) of the Occupational Pension Schemes (Charges and Governance) Regulations 2015, should be based on an average of the previous 5 years' transaction costs or, where data is available for fewer than 5 years, an average of transactions costs over the years for which data is available. Currently, less than 5 years of transaction cost information is available from providers and as such the table below reflects the average transactions costs of information received to date.

The Trustee is reliant on underlying investment managers to provide transaction cost data and has previously experienced some difficulty in accessing this information on a timely basis, particularly from

the Plan's AVC providers. However, the Trustee can confirm that they have received everything required as at 30 September 2019.

Over the reporting period, the Options Open Lifestyle (the default arrangement) levied a Total Expense Ratio (TER) ranging from 0.316% p.a. to 0.374% p.a. depending on the member's period to retirement. Importantly, the TER range for the default arrangement was below the charge cap set by the Regulations of 0.75% p.a.

The Plan also offers a range of 18 self-select funds and two further Lifestyle arrangements which may be chosen by members as an alternative to the default arrangement. A full breakdown of the TERs and transaction costs applicable to the investment options available to members over the period until 30 September 2019 are listed in the table below.

Fund		TER (p.a.)	Transaction Costs (p.a.)	Total Costs (p.a.)
<b>Lifestyle arrangements</b>				
Options Open Lifestyle (default arrangement)		0.316% - 0.374%	-0.007% - 0.021%	0.317% - 0.395%
Annuity Purchase Lifestyle		0.140% - 0.374%	-0.007% - 0.021%	0.145% - 0.395%
Lump Sum Withdrawal Lifestyle		0.110% - 0.374%	-0.007% - 0.023%	0.130% - 0.395%
<b>Lifestyle-only funds</b>				
BlackRock Aquila Life Up To 5 Year Index-Linked Gilt Index		0.157%	0.008%	0.165%
<b>Freestyle funds</b>				
Blended Funds	Visa Global Equity Fund	0.283%	0.007%	0.290%
	Visa Property Fund	0.697%	-0.138% <sup>1</sup>	0.559%
Active Equity Funds	JPM UK Specialist Equity	0.450%	0.325%	0.775%
	Schroder Global Emerging Market Equity	1.176%	-0.009%	1.167%
	Schroder Global Equity	0.630%	0.233%	0.863%
	MFS Global Equity	0.750%	0.042%	0.792%
Passive Equity Funds	BlackRock Aquila World ex-UK Equity Index	0.120%	-0.013%	0.107%
	LGIM UK Equity Index	0.120%	-0.025%	0.095%
	LGIM Ethical Global Equity Index	0.300%	0.007%	0.307%
	BlackRock Aquila MSCI World Index	0.130%	-0.013%	0.117%
Active Gilt and Bond Funds	Threadneedle Long Dated Gilt	0.326%	0.023%	0.349%
	Threadneedle UK Corporate Bond	0.350%	0.060%	0.410%

Fund		TER (p.a.)	Transaction Costs (p.a.)	Total Costs (p.a.)
	LGIM Pre-Retirement	0.150%	0.000%	0.150%
Passive Gilt and Bond Funds	BlackRock Aquila Life Over 15 Year UK Gilt Index	0.114%	-0.022%	0.092%
	BlackRock Aquila Life Over 5 Year Index-Linked Gilt Index	0.114%	0.012%	0.126%
	BlackRock Aquila Corporate Bonds All stocks	0.137%	-0.046%	0.091%
Multi-Asset	Insight Broad Opportunities	0.770%	0.155%	0.925%
Active Balanced Fund	Threadneedle Managed Equity Focused	0.291%	0.222%	0.513%
Cash	BlackRock Sterling Liquidity	0.110%	0.020%	0.130%
Property	LGIM Managed Property	0.830%	0.007% <sup>2</sup>	0.837%

Source: Scottish Widows

<sup>1</sup>Transaction costs only available for period 1 October 2018 to 30 September 2019 only.

<sup>2</sup>Transaction costs for this fund were negative over the year to 30 September 2019, resulting in a lower than expected average transaction cost over the past two years.

### Legacy Funds

Separately, some members remain invested in the Aviva Property Fund. This is a legacy arrangement and is closed to new members.

Fund	TER (p.a.)	Transaction Costs (p.a.)	Total costs (p.a.)
Aviva Property Fund	0.570%	1.698%	2.268%

Source: Scottish Widows

### AVC Arrangements

There are also AVC arrangements available with Zurich, Utmost Life and Pensions (previously Equitable Life), Aviva and Scottish Widows. These arrangements are only available to members in the Defined Benefit section of the Plan. The charges related to these arrangements are shown below.

Provider	Fund	TER (p.a.)	Transaction Costs (p.a.)	Total costs (p.a.)
Zurich	Balanced Default Lifestyle	0.72%	0.025% - 0.175%	0.745% - 0.895%
	Aquila UK Equity Index	0.56%	0.002%	0.562%
	Equity Managed Fund	0.72%	0.175%	0.895%
	Long-Dated Gilt Fund	0.72%	0.025%	0.745%

Provider	Fund	TER (p.a.)	Transaction Costs (p.a.)	Total costs (p.a.)
	Managed Fund	0.720%	0.205%	0.925%
	Secure Fund	0.710%	0.009%	0.719%
	UK Equity Fund	0.770%	0.165%	0.935%
	With-Profits Fund	0.700%	0.055%	0.755%
	UK Opportunities Fund	0.770%	0.067%	0.837%
Equitable Life*	With Profits Fund	1.000%	0.525%	1.525%
Aviva	Balanced Managed Fund	1.050%	0.000%	1.050%
Scottish Widows	Managed Fund	0.375%	0.255%	0.630%
	Cash Fund	0.200%	0.000%	0.200%

Source: Providers

\*As of 1 January 2020, the With Profits Fund was converted to a unit linked policy on transfer of Equitable Life's business to Utmost Life and Pensions

The Trustee has produced the following illustrations to demonstrate the effect of the above costs and charges for investment strategies representative of the Plan's membership.

The majority of members invest in the Options Open Lifestyle strategy. As a reminder, this strategy automatically transitions members' funds from global equities and property in the earlier years, switching into a multi-asset fund, corporate bonds, index-linked gilts and cash as members approach retirement age.

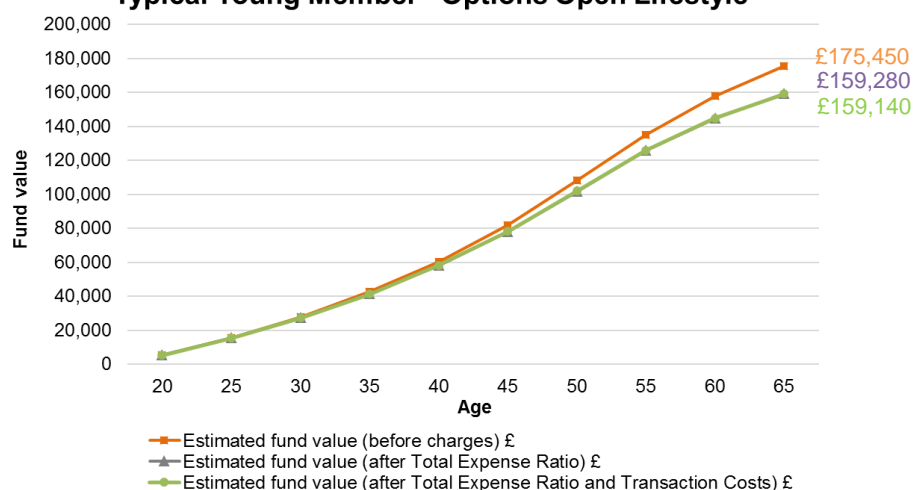
In order to illustrate the effect of different investment returns, costs and charges, the Trustee has also produced illustrations for the Schroder's Global Emerging Markets Fund and the BlackRock Sterling Liquidity Fund for comparison.

The tables and charts below illustrate the effect of the costs and charges at different ages on members' projected retirement pots for a typical young active member within the Plan, a typical active member and a typical deferred member.

#### Typical Young Active Member

For a typical young active member invested in the Options Open Lifestyle, BlackRock Sterling Liquidity Fund and the Schroder's Global Emerging Markets Fund, the estimated impact of charges on accumulated fund values is illustrated below. The amounts shown relate to a member aged 19, current fund value of £3,500, salary of £18,500, ongoing contributions of 9% of salary and a Retirement Age of 65.

### Typical Young Member - Options Open Lifestyle

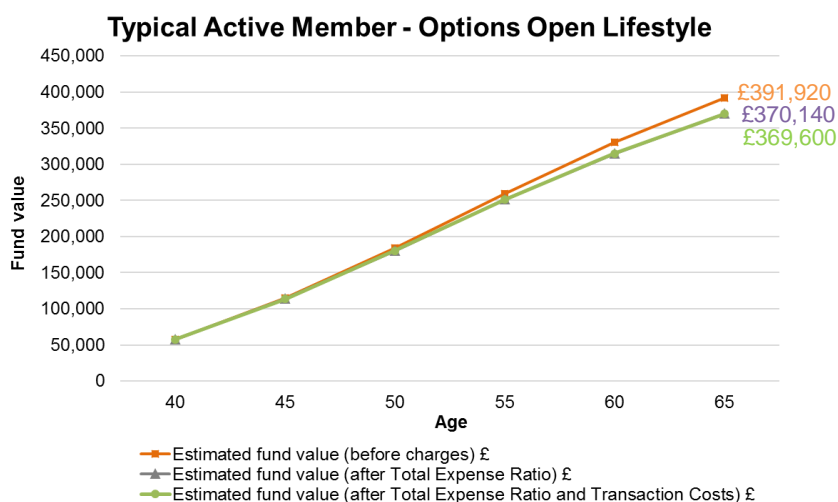


Age	BlackRock Sterling Liquidity Fund			Options Open Lifestyle			Schroders Global Emerging Markets Equity Fund		
	Est. fund value (before charges) £	Est. fund value (after charges) £	Effect of charges £	Est. fund value (before charges) £	Est. fund value (after charges) £	Effect of charges £	Est. fund value (before charges) £	Est. fund value (after charges) £	Effect of charges £
20	5,070	5,070	-	5,310	5,300	10	5,360	5,310	50
25	12,550	12,490	60	15,460	15,280	180	16,140	15,460	680
30	19,440	19,280	160	27,720	27,160	560	29,880	27,710	2,170
35	25,760	25,480	280	42,520	41,290	1,230	47,400	42,490	4,910
40	31,590	31,150	440	60,400	58,100	2,300	69,730	60,350	9,380
45	36,940	36,330	610	81,980	78,100	3,880	98,190	81,900	16,290
50	41,870	41,070	800	108,040	101,890	6,150	134,480	107,910	26,570
55	46,400	45,390	1,010	135,010	125,820	9,190	180,740	139,310	41,430
60	50,560	49,350	1,210	157,670	144,880	12,790	239,720	177,220	62,500
65	54,390	52,960	1,430	175,450	159,140	16,310	314,900	222,980	91,920

### Typical Active Member

For a typical active member invested in the Options Open Lifestyle, BlackRock Sterling Liquidity Fund and the Schroder's Global Emerging Markets Fund, the estimated impact of charges on accumulated fund values is shown below. The amounts shown relate to a member aged 39, current fund value of £47,400, salary of £69,700, ongoing contributions of 12% of salary and a Retirement Age of 65.

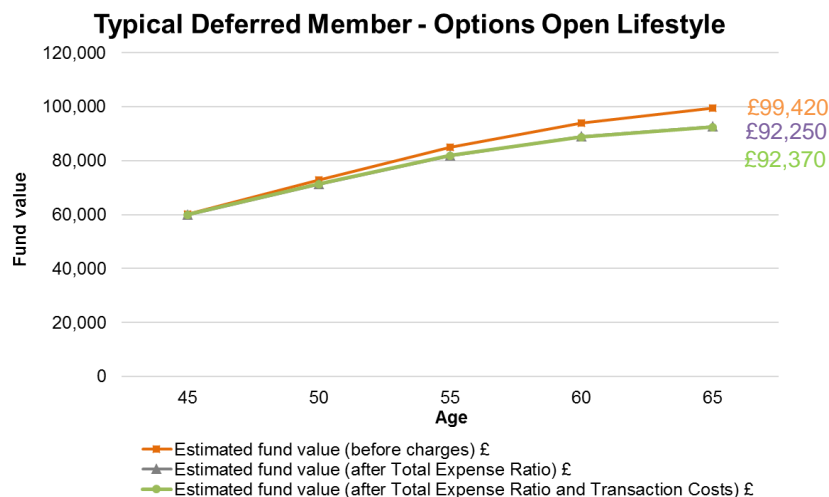




Age	BlackRock Sterling Liquidity Fund			Options Open Lifestyle			Schroders Global Emerging Markets Equity Fund		
	Est. fund value (before charges) £	Est. fund value (after charges) £	Effect of charges £	Est. fund value (before charges) £	Est. fund value (after charges) £	Effect of charges £	Est. fund value (before charges) £	Est. fund value (after charges) £	Effect of charges £
40	54,810	54,740	70	57,640	57,480	160	58,220	57,640	580
45	90,040	89,530	510	115,060	113,490	1,570	120,970	115,030	5,940
50	122,440	121,320	1,120	184,400	180,120	4,280	200,960	184,310	16,650
55	152,240	150,370	1,870	259,740	250,940	8,800	302,930	267,940	34,990
60	179,660	176,920	2,740	330,040	314,840	15,200	432,930	368,900	64,030
65	204,870	201,180	3,690	391,920	369,600	22,320	598,650	490,770	107,880

### Typical Deferred Member

For a deferred member invested in the Options Open Lifestyle, BlackRock Sterling Liquidity Fund and the Schroder's Global Emerging Markets Fund, the estimated impact of charges on accumulated fund values is shown below. The amounts shown relate to a member aged 43, current fund value of £55,900 and a Retirement Age of 65.



Age	BlackRock Sterling Liquidity Fund			Options Open Lifestyle			Schroders Global Emerging Markets Equity Fund		
	Est. fund value (before charges) £	Est. fund value (after charges) £	Effect of charges £	Est. fund value (before charges) £	Est. fund value (after charges) £	Effect of charges £	Est. fund value (before charges) £	Est. fund value (after charges) £	Effect of charges £
45	54,060	53,920	140	<b>60,280</b>	<b>59,920</b>	<b>360</b>	61,600	60,270	1,330
50	49,720	49,280	440	<b>72,790</b>	<b>71,290</b>	<b>1,500</b>	78,530	72,760	5,770
55	45,740	45,030	710	<b>85,010</b>	<b>81,900</b>	<b>3,110</b>	100,110	87,830	12,280
60	42,070	41,150	920	<b>93,840</b>	<b>88,750</b>	<b>5,090</b>	127,620	106,030	21,590
65	38,690	37,610	1,080	<b>99,420</b>	<b>92,370</b>	<b>7,050</b>	162,690	128,000	34,690

The following assumptions have been made for the purposes of the above illustrations:

1. **Projected pension pot values are shown in today's terms, and do not need to be reduced further for the effect of future inflation.**
2. Inflation is assumed to be 2.5% each year.
3. Salary growth is assumed to be in line with inflation.
4. Values shown are estimates and are not guaranteed.
5. The assumed growth rates (gross of costs and charges) are as follows:
  - Visa Global Equity Fund 6.6% p.a.
  - Visa Property Fund 5.0% p.a.
  - Insight Broad Opportunities 3.5% p.a.
  - BlackRock Sterling Liquidity Fund 0.8% p.a.
  - BlackRock Aquila Corporate Bond All Stocks Index 1.0% p.a.
  - LGIM Pre-Retirement Fund 0.9%
  - BlackRock Aquila Over 5 Year Index-Linked Gilts -0.3%
  - BlackRock Aquila Up to 5 Year Index-Linked Gilts 0.1%
  - Schroder Global Emerging Market Equity 7.6%
6. Contributions are assumed from current age to 65 and increase in line with assumed earnings inflation of 2.5% each year.

#### 4. Value for Members assessment

The Trustee is also required to make an assessment of the costs and charges borne by members and the extent to which those costs and charges represent good value for money for members.

In conjunction with their DC investment advisers, the Trustee has established a cost-benefit analysis framework in order to assess whether the member borne charges deliver good value for members. The cost part of the analysis considers the costs and charges members pay. The benefit side of the analysis considers the following areas where the Trustee believes there is a benefit derived by members. These benefits can be financial or non-financial in nature.

The Trustee has identified the following benefits:

- Quality of communications
  - The Plan provides members with clear, regular communications including a quarterly summary of fund performance available to members via the website, benefit statements and 'at retirement' communications.
  - In addition to this, the Trustee notifies members in advance of any planned changes to the Plan's investment changes, for example, ahead of the implementation of the new investment strategy which was in 2018.

- Members also have access to the Buck member portal which allows member to;
  - View their transaction and contribution history;
  - Make changes to their investment choices;
  - Access their previous benefit statements;
  - View important documentation for example the Member Handbook and Investment Guide; and
  - Access educational information including retirement planning and modelling tools.
- Quality of investment choices
  - The Plan provides members with an appropriate range of lifestyle and freestyle fund options covering a range of risk-profiles and asset classes. The range of investment choices has been designed with advice from the Plan's DC investment adviser and taking into account the membership profile and the potential objectives members may have.
  - The performance of the investment options is monitored on a quarterly basis by the Trustee to ensure the funds continue to meet their performance objectives. This monitoring includes a red-amber-green rating system in order to assist the Trustee in identifying any areas of concern as soon as possible.
- Quality of administration
  - The Trustee monitors the Plan's administration on a quarterly basis and over the period found that the necessary administration standards were being achieved. In addition to this the Trustee often meets with the administrator in order to ensure ongoing adherence to the standards set.
  - There is also a dedicated Administration and Governance Sub Committee that meets regularly to monitor the controls and processes in respect of the Plan's administration.
- Quality of governance and management of the Plan
  - The Trustee believes that good governance is key to ensuring that a framework exists and is actively in use to help deliver better member outcomes. The Trustee regularly reviews and update their governance processes and procedures to make sure that these meet industry best practice.
  - The Trustee is also in the process of carrying out an assessment against the DC Code of Practice to ensure that they are meeting best practice. As part of this assessment, actions will be put in place in order to address any gaps. This assessment is due to be completed in 2020 and will be carried out on an annual basis going forward.
  - The Chairman of the Trustee also carries out an annual assessment meeting with each individual Trustee, in order to allow for ongoing evaluation.

Alongside these benefits, the costs and charges associated with the default arrangement are well below the charge cap of 0.75% per annum. The Trustee deems that the charges that apply to the alternative lifestyle strategies and self-select funds in the DC arrangements are also of a reasonable level, with very few of the investment options having costs that exceed the charge cap. Given these charges, and the other benefits identified above, the Trustee is comfortable that the costs and charges borne by members represent good value for members.

Whilst the AVC arrangements are generally more expensive than the DC arrangements, the Trustee, with support from their investment adviser, deems that these costs are within the range we would expect from AVC arrangements. However, over 2019 the Trustee carried out a detailed review of these arrangements and is now consolidating these arrangements into the DC arrangements over 2020. This will provide members with a number of benefits, including access to a greater range of funds, including three lifestyle options, and more competitive fees.

The Trustee's overall assessment incorporated a detailed review of the quality of governance, investments, communications and administration versus the costs and charges paid, to assess whether the charges represent good value for members.

## **5. Trustee Knowledge and Understanding**

The Regulations require the Trustee to have appropriate knowledge and understanding necessary to enable them to properly run the Plan and ensure sufficient standards of governance and administration. For the reasons set out below, during the Plan year, the Trustee has met the requirements of sections 247 and 248 of the Pensions Act 2004 (requirements for trustee knowledge and understanding).

The Trustee recognises the importance of training and development. Trustee Directors take personal responsibility for keeping themselves up-to-date with relevant developments.

In addition to this, the Trustee Directors undertake regular DC-specific training to ensure that all of the Trustee Directors have a broad-based knowledge and understanding of issues relating to the governance of the DC and AVC arrangements.

For example, during the Plan year, the Trustee has applied their DC knowledge and understanding to, amongst other things:

- Implementing a policy within the Statement of Investment Principles to cover the Trustee's view on responsible investment, including environmental, social and governance factors;
- Considering whether the Plan's Ethical investment option, made available to the DC self-select members, remained fit for purpose, concluding that the investment option continued to meet the needs of members;
- Working with the administrators (Buck) to undertake a review of the Plan's membership data to ensure minimal gaps;
- Moving to a Corporate Trustee Board structure from an individual trustee structure;
- Completing an in-depth review of the Plan's AVC arrangements, including an assessment of whether members would benefit from having these benefits consolidated into the core DC range held with Scottish Widows; and
- Taking steps to make a Shariah compliant investment fund available to the Plan's DC membership.

The Trustee Board incorporates a range of skills and experience and a diverse mix of backgrounds, including representatives from finance and pensions management. There are currently five Employer-Nominated Trustee Directors, two of which are independent Trustee Directors (who each hold the PMI Certificate in Trusteeship) and three Member-Nominated Trustee Directors, as well as a Trustee Secretary.

In addition to the skills within the Trustee Board, the Trustee works closely with their appointed professional advisers throughout the year to ensure that they continue to run the Plan and exercise their functions properly. Their professional advisers also attend Trustee meetings.

Professional advisers provide ongoing advice / training to the Trustee Directors both inside and outside of Trustee meetings on developments impacting the Plan or in respect of pensions or trust law (including any effect on or the application of the Trust Deed and Rules). This ensures that the Trustee Directors are able to continue to evolve their knowledge and understanding as and when changes arise. In particular, the Trustee Directors receive weekly and ad hoc legal updates from their new legal advisers (Allen & Overy LLP) and to compliment the above, all Trustee Directors received comprehensive training on the Trust Deed and Rules from Allen & Overy in November 2019.

The Trustee Directors take training and development responsibilities seriously and a record is kept of the training completed by each Trustee Director, maintained by the Trustee secretary. These training records are regularly reviewed to assess any training gaps.

Over the year to 30 September 2019, the Trustee Directors have undertaken training on, amongst other things, relating to:

- Responsible investment and environmental, social and governance factors (including climate change) and how this can affect and be incorporated into investing;
- Brexit developments and how this might impact the Plan and its members;
- Shariah compliant investment options;
- Absolute return bonds;
- GMP equalisation;
- Chairman's Statement and Trustee Report & Accounts;
- Moving over to a Corporate Trustee Board and how this differs from a group of individual trustees;
- Consolidation of Additional Voluntary Contributions including related legal issues;
- Strategic objectives for Investment Consultants;
- 21<sup>st</sup> century Trusteeship.

Seven of the eight Trustee Directors have completed the Regulations' Trustee Training Toolkit. The final Trustee Director is currently working through the Trustee Training Toolkit, with a view to complete imminently.

Over the course of the year, two new Trustee Directors joined the board. On appointment, Trustee Directors are required to complete the Pension Regulators Trustee toolkit training. Each new Trustee Director has a meeting with the Chair of the Trustee to discuss the role.

Overall the Trustee believes it continued to meet the Pension Regulator's TKU requirements (as set out under the relevant Code of Practice) during the Plan year, and that the combined knowledge and understanding, together with advice received, enables the Trustee to properly exercise its function.