



Atlas Master Trust

Scheme Registration Number: 12012018

Trustee's Annual Report and Financial Statements
Ended 31 March 2021

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Trustee Board and Trust Advisers

Trustee:	Atlas Master Trust Trustee Limited
Trustee Directors:	Alan Whalley Steve Delo (representing PAN Trustees UK LLP) Penny Green (representing BESTrustees PLC)
Independent Chair of the Investment Sub Committee:	Paul Trickett
Executive Team:	Andy Dickson (Head of Market Strategy) (until 25 April 2021) Paul McBride (Head of Risk and Governance) (until 30 April 2021) Anish Rav (Head of Client Strategy) (until 30 July 2021) Gary Smith (CEO) Richard Solomon (Head of Operations) Neil Taylor (Senior Governance Manager and Secretary to the Trustee) Roz Watson (Head of Engagement) (until 25 July 2021)
Independent Auditor:	Crowe U.K. LLP
Banker:	National Westminster Bank PLC Barclays PLC
Investment Managers:	Scottish Widows Limited
Administrator:	Capita Pension Solutions Limited
Investment Consultants:	Capita Pension Solutions Limited (Capita Employee Benefits Limited and Capita Employee Benefits (Consulting) Limited merged into Capita Employee Benefits Limited on 31 December 2020 and changed its name to Capita Pensions Solutions Limited on 27 April 2021.) Hymans Robertson LLP
Legal Adviser:	Pinsent Masons LLP

Chairman's Report

Introduction

We are delighted to present our Trustee Report for the Atlas Master Trust ("Atlas") for the period 1 April 2020 to 31 March 2021.

When I wrote last year's report it is probably fair to say I did not expect the impact of the COVID-19 pandemic to be as long lasting as it has been. Although the situation seems to be improving, we can only hope this is long lasting and the efficiency of vaccines works in the long term. At the same time we should not forget that the situation in other countries is very different in all too many cases.

As far as Atlas is concerned, the two key areas of continued concern for me and my Board, during the pandemic have been our investments and administration – specifically the ability of our service providers to continue to adapt to the crisis and continue to function. There is more detail on both of these elsewhere in this report, including in our Value for Members assessment, but the main considerations are as follows:

Proposed Change of Funder

On 21 October 2021 it was announced that, subject to regulatory approval, SEI will take over as the financial and strategic backer (the Funder) of Atlas, extending a successful, long-term strategic partnership between SEI and Capita. SEI is a leading global provider of investment services with more than 50 years' experience in investment and wealth management. The administration of Atlas will continue to be delivered by Capita, who also administer the SEI Master Trust.

Investment

The FTSE 100 index is a commonly used index to measure performance of investment markets generally, comprising the top 100 UK companies. The last year has seen uncertainty and with that, volatility in the markets. On 1 April 2020, near the start of the pandemic, the FTSE was at one of its lowest points at 5454.57. It ended the year on 31 March 2021 at 6,713.63 which meant the Index increased by over 23% over the period. However, this hides the volatility of the market which was trying to understand the economic impact of lockdowns and the uncertainty surrounding whether an effective vaccine could be produced. The market seems to be less volatile now, but as we know, this pandemic is unpredictable and therefore the future economic impact remains uncertain.

Our Primary Default Strategy (which is where most of our members are invested) uses a multi-asset fund approach which – through asset diversification – offers a degree of protection from more volatile assets like stocks and shares in times like these. I'm pleased to report that our MAP 1 Fund has performed well during the period, reporting annual growth of 36.3% for the 12 Months to 31 March 2021. Our primary investment partner (Schroders) have provided us with regular updates over this period and continue to engage with us regularly, including updates on their view of the market both in the short and long term. We are satisfied that the diversified investment portfolio has helped to reduce the impact of the volatility in the market and performed like we would have expected over the period. We will of course continue to monitor both Schroders performance and the wider economic picture.

Our key message throughout the pandemic has been 'don't panic!' and the recovery of the market highlighted above reflects this. For many of our members, pensions is a long term

Chairman's Report

investment and market volatility over such a long period is expected, even though no-one could have really predicted the worldwide impact of the pandemic.

Administration

Our two key service providers are Capita Pension Solutions Limited ("Capita"), who perform all the administration and record keeping functions, and Scottish Widows, who provide the investment platform for all of Atlas' investments. We review their Business Continuity and Recovery Plans (their plans for maintaining an adequate service during business disruptions) every year, and these have continued to be resilient as the pandemic has progressed. We continue to be impressed by how quickly both organisations adapted to this strange new world of remote working and how little disruption this has caused to our day to day activities. All of our core financial transactions continue to be processed and our Service Level Agreements (the time taken to complete different activities) have continued to have been largely maintained with only a slight deterioration in some non-critical tasks.

Other activities

Atlas became an authorised Master Trust in August 2019. Authorisation was brought about by an Act of Parliament with the intention of raising standards and security for pension scheme members. It requires that:

- All those who have responsibility for Atlas are 'Fit and Proper' persons. This includes each of us trustees, the Directors of Capita (the company that is responsible for financing Atlas if our costs exceed its income) and the people responsible for setting Atlas' commercial direction. 'Fit and Proper' means that everyone is of good character and good financial standing, with the requisite skills, knowledge and competence to perform their roles to the required standards.
- Atlas is financially stable, supported by a financially credible Funder (Capita), and able to withstand the financial impacts of all reasonably foreseeable events.
- Atlas has financial reserves sufficient to see it through foreseeable events.
- We have in place robust Systems and Processes that ensure, among other things;
 - Contributions from members and their employers are received when they are due and invested promptly.
 - Payments are made correctly when due.
 - Accurate data is kept and protected against corruption and cyber-attack.
 - We use appropriate due diligence to appoint, and then manage, our various service providers.
 - We have appropriate levels of risk management.

Atlas now operates under an ongoing supervisory regime whereby we and other Master Trusts must continue to satisfy The Pensions Regulator that we meet the required standards.

Atlas has always had a strong focus on good governance, now supported by the authorisation and supervision regime for Master Trusts. I have little doubt that our governance structure and approach has helped minimise the impact of the COVID-19 pandemic on the operations of Atlas and therefore helping to protect member outcomes, even if it has had a greater impact on our personal lives in the meantime.

Chairman's Report

My Chair's Report starting on page 3 covers some of the other activities we have been engaged in over the reporting period.

Members and Assets

At 31 March 2021, Atlas had 111,930 members (2020: 107,092), contribution income of £123,463 million (2020: £125,671 million) and assets of £1,366,237 million (2020: £980,081 million).

Service Providers

The Trustee has a number of service providers, each under a formal service agreement:

Administrator	Capita Pension Solutions Limited
Investment Advisors	Capita Pension Solutions Limited and Hymans Robertson LLP
Investment Platform Provider	Scottish Widows Limited
Legal Advisor	Pinsent Masons LLP
Statutory and Assurance auditor	Crowe U.K. LLP

As Trustee, we have a responsibility to assess the performance of each of our service providers on a regular basis, and we have a legal duty to change them or to force improvement where service levels fall below the high standards we set. Performance reviews of all our service providers are scheduled into our Annual Planner. Following our reviews this year, we agreed that each of our service providers had discharged their responsibilities as well as we would hope and expect, and no changes were felt to be necessary. We continued throughout this crisis to keep our key service providers under close review and continue to be delighted with the resilience of Capita and Scottish Widows throughout.

We also review our own competence and skills, and those of the Atlas Executive Team which supports us, on a regular basis. In the light of a number of leavers from the Executive Team additional interim resources are being provided by Capita as appropriate while the Trustee considers long term options. You'll find more information on this review process in our Governance Statement on page 35.

Each year, we are required by law to assess the value that Atlas offers to its members – Our 'Value for Members' assessment. Focussing on principles of good value is something we all feel very passionate about. There is little doubt that this legal obligation is benefitting pension scheme members throughout the UK. Our assessment of Value for Members starts on page 49.

As in previous years I would like to emphasise the importance of ensuring we can stay in touch with you electronically. This is still vitally important to us and to you. We want to stay in touch with you throughout your Atlas journey, by helping us to communicate with you in the most timely, efficient and reliable way. Again, in this year's annual update, where it has been sent by post we have included a QR code. Using this will enable you to 'land' on the Atlas website and update some of your personal details, including providing us with a 'permanent' e-mail address that you expect to keep irrespective of where you live or work. We urge you to use this.

Chairman's Report

I am sure many of you have been impacted by the COVID-19 pandemic in many different ways. Hopefully we are now seeing real improvement in the situation and this is allowing you to try and look forward to better times but please still continue to protect yourselves and protect others around you and stay safe.

A handwritten signature in black ink that reads "Alan Whalley". The signature is written in a cursive style with a large, stylized 'A' and 'W'.

Alan Whalley

Chair of the Trustee

Date: 26 October 2021

Trustee Report

The Trustee of Atlas has pleasure in presenting its annual report together with the financial statements and Governance Statement for the year ended 31 March 2021.

Trust Management

The Trust

Atlas is a multi-employer Defined Contribution occupational pension scheme and is governed by a Trust Deed which ensures that the assets of Atlas are segregated from the finances of the Establishing Employer and each principal and/or participating Employer.

Atlas is governed by a Trust Deed and Rules dated 8 July 2020 as amended from time to time.

Atlas' Founder is Capita Pension Solutions Limited ("Capita") and is also its Funder (the firm responsible for Atlas' financial sustainability and the firm which is entitled to receive any profits from it). As a multi-employer occupational pension scheme, Atlas also has a number of non-associated participating and subsidiary Employers.

Atlas is also required to comply with other legislative requirements, such as taxation and social security which may override the provisions of the Trust Deed from time to time.

Atlas is a Registered Pension Scheme under Chapter 4 of the Finance Act.

Trustee of the Trust

The powers of appointment and removal of the Trustee Directors are vested in Capita. A protocol agreement exists between Capita and the Trustee that sets out each party's expectation with regards to future appointments and removal.

As Atlas is a relevant centralised scheme where membership is open to more than one employer, Atlas was exempt from the normal trustee requirements for member nominated directors provided it had an independent Trustee.

Trustee Meeting

The Trustee Directors met 4 times during the year ended 31 March 2021.

Trustee and Advisers

The Trustee is assisted by various professional advisers in the operation of Atlas. All advisers who have acted on behalf of, or have been retained, by the Trustee during the year are detailed on page 2 of this Report.

In accordance with the Pensions Act 1995, there are written agreements in place between the Trustee and each of the professional advisers.

Financial Development of Atlas

The Financial Statements for the year ended 31 March 2021 are set out on pages 111 to 124. The fund at 31 March 2021 stood at £1,366,237 million (2020: £981,029 million).

The Financial Statements following this Report have been prepared and audited in accordance with Regulations made under Section 41(1) and (6) of the Pensions Act 1995.

Contributions

Total contributions received in the year to 31 March 2021 amounted to £123,463 million (2020: £125,671 million).

Trustee Report

Atlas Administration Expenses

All Atlas administration expenses have been met by Capita for the year ended 31 March 2021, except for the management charge which is payable to Capita.

Transfer Values

Transfer values are equal to the value of the member's Personal Account at the time of transfer.

Internal Dispute Resolution Procedure

The Trustee has prepared an Internal Dispute Resolution Procedure which is available to all Atlas members.

Membership

The table below details the membership of Atlas for the year ended 31 March 2021.

	2021	2020
Active members in service	39,698	36,216
New entrants	7,122	9,447
From Deferred	14	7
Late adjustment**	(1,204)	1,643
Joined in error*	(9)	(133)
Refunds	(6)	(1)
Deferred members	(8,036)	(7,425)
Commutation	(104)	(11)
Transfers	(326)	(6)
Death	(64)	(37)
Retirement	(32)	(2)
At end of Year	37,053	39,698

Trustee Report

Preserved members	67,394	64,233
Adjustments**	-	(1,936)
At start of year	67,394	62,297
From active	1,204	(7)
New entrants	8,036	7,435
Deaths	(80)	(55)
Commutations	(264)	(409)
Refunds	(1)	(1)
Leavers	-	(79)
Set to active	(14)	-
Transfers out	(1,294)	(1,763)
Retirement	(90)	(14)
Joined in error*	(14)	(10)
At end of Year	74,877	67,394
Total membership at end of Year	111,930	107,092

* The members recorded as joined in error are either where duplicate member data has been received on the joiner templates from the clients, or where records are created from the joiner data and then we are notified shortly after that the member has opted out.

** The late adjustments are manual interventions following a reconciliation exercise.

Trustee Report

Summary of Contributions Payable in respect of Atlas Year Ended 31 March 2021

This Summary of Contributions has been prepared by, or on behalf of, and is the responsibility of the Trustee.

It sets out the employer and member contributions payable to Atlas under the rules for fifteen participating employers in respect of the year ended 31 March 2021.

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Contributions payable

Employer

Normal contributions	56,555
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Salary sacrifice	40,224
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Employee normal contributions	13,733
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Contributions required by the Payment Schedules	110,512
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Other contributions payable

Employee AVCs	12,538
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Augmentations	413
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Contributions per the financial statements	123,463
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Contributions are payable by each participating employer in accordance with the Payment Schedules and Deeds of Participation which set out the earnings components on which contributions are based, and the different contributions rates payable by both the members and the employers.

It is the responsibility of the employers to ensure that the correct contributions are paid over to the Master Trust within the timescales agreed between the Trustee and the employers. Whilst the Trustee monitors that contributions are received from each participating employer and allocated to members' accounts, the Trustee does not have access to the payroll records of the participating employers, and is therefore unable to confirm with certainty that amounts have been paid in accordance with the required Payment Schedules for the Master Trust as applicable for each participating employer.

Trustee Report

Investment Matters

Overview

Atlas has two primary types of participant.

The first type uses only the 'off-the-shelf' investment options chosen by the Trustee. The second type uses a bespoke fund range, approved by the Trustee but designed with a specific membership demographic in mind. Both off-the-shelf and bespoke investment options are covered by the Trustee's Statement of Investment Principles ("SIP") – see below.

For both off-the-shelf and bespoke memberships the Trustee's objective is to make available an appropriate range of investment options designed to generate income and capital growth, which together with new contributions from members and their employers, will provide a retirement fund (or 'pot') with which the members secure a retirement income. The SIP outlines the investment objectives and strategy for the assets of Atlas.

The investment funds offered to members are white label funds provided by Scottish Widows Ltd ("Scottish Widows"). These are funds specifically created for Atlas which are invested in other funds available through Scottish Widows' investment platform.

The Trustee, with the assistance of its Investment Sub Committee and appointed investment advisers, determines the underlying investment strategy for Atlas and sets out the broad policy to be adopted by each of the appointed fund managers, who then make the day-to-day decisions about the management of the assets.

The fund managers and mandates of the underlying funds are as follows:

Underlying Fund Manager	Asset Class Mandate
Bank of Montreal Global Asset Management	Ethical fund
BlackRock Investment Management (UK) Ltd	Money market fund
Columbia Threadneedle Asset Management	Property fund
HSBC Asset Management (UK) Ltd	Shariah compliant fund
Invesco Asset Management	Multi asset growth fund
Lazard Asset Management Ltd	Active emerging markets equity fund
Legal & General Investment Management Limited	Passive and multi-asset growth funds
M&G Investments Ltd	Active corporate bonds fund
Schroder Investment Management Limited	Multi asset growth and decumulation funds
Nordea Asset Management and Invesco Asset Management Limited	Multi asset growth fund

Trustee Report

Investment Strategy

The Trustee makes available a range of lifestyle strategies. The overall aim of lifestyle strategies is to deliver a level of return consistent with the level of risk taken over the members' lifetime. The strategies encompass changing risk profiles over time and then further changes in line with the way members may take their benefits.

The Trustee conducts a formal review of its default strategy on an annual basis but in practice there is an ongoing process of evaluation to ensure that the strategy reflects best thinking and best practice within the constraints of regulation and the available investment budget.

The investment strategy is implemented exclusively through Scottish Widows. The Trustee has taken into account members' investment objectives which have determined the level of investment risks, including credit risk and market risk members are exposed to through both the default strategy and self-select options. The investment risk that members are exposed to depends on their options selected and number of years to retirement (if they are in a lifestyle strategy). The SIP outlines the investment objectives and strategy for Atlas assets; this includes the Trustee's Environmental, Social and Governance beliefs and how these beliefs have been carried out in practice.

The Trustee monitors the underlying funds by quarterly performance monitoring reports of the underlying managers, provided by Schroders, Scottish Widows and separately by Capita.

Investment Manager

The Trustee has delegated the day-to-day management of investments to its appointed platform provider Scottish Widows and the underlying fund managers appointed by the Trustee. A written agreement between the Trustee and Scottish Widows sets out the terms on which Scottish Widows will act. The underlying fund managers have a direct relationship with Scottish Widows and only an indirect relationship with the Trustee.

The manager's duties include the consideration of social, environmental or ethical (ESG) issues in the selection, retention and realisation of investments as well as voting and corporate governance in relation to Atlas's assets. The Trustee's investment adviser monitors the ESG credentials of all fund managers on their recommended panel. This is explained in further detail in the SIP, which forms part of the Governance statement. The relevant information can be found on pages 17 and 57.

Investment Principles

In accordance with Section 35 of the Pensions Act 1995, the Trustee has prepared a SIP which includes the Trustee's policy relating to ethical investment and the exercise of the rights attaching to investments. Any member may request a copy. The SIP may change from time to time as deemed appropriate or necessary by the Trustee and/or according to advice received from the investment manager or consultants. The current SIP can be found at:

<http://www.atlasmastertrust.co.uk/library/documents?persona=gettingready>.

The Trustees have the following policies in relation to the investment management arrangements for the Scheme:

- How financially material considerations are taken into account in the selection, retention and realisation of investments over the appropriate time horizon.

Trustee Report

Investment Principles (continued)

- How (if at all) non financial matters are taken into account in the selection, retention and realisation of investments.
- How the exercise of rights (including voting rights) attaches to investments and how engagement activities in respect of investments are undertaken.

The Above policies are detailed on pages 68 and 69 under the headings:

- Environmental, Social and Governance (ESG) Investments
- Non Financial Matters
- Policy on Voting Rights and Engagement
- How the investment manager is incentivised to align their investment strategy and decisions with the Trustees' policy.
- How the investment manager is incentivised to make decisions based on assessments of medium to long term financial performance of an issuer or debt or equity and to engage with them to improve performance in the medium to long term.
- How the method (and time horizon) of the evaluation of investment manager's performance and the remuneration for their services are in line with the Trustees' policies.
- The method for monitoring portfolio turnover costs incurred by investment manager and how they define and monitor portfolio turnover or turnover range.
- The duration of the Trust's arrangement with the investment manager.

These policies are detailed on pages 71–73 under the headings:

- Incentives
- Duration of Investment Manager Appointments
- Compliance with the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019

Departures from Investment Principles

To the best of its knowledge, the Trustee can report that there has not been any departure from the SIP by Atlas's underlying investment managers during the year ended 31 March 2021.

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Custodial Arrangements

As Scottish Widows holds units in the underlying funds, as opposed to holding the actual assets, they do not appoint their own custodians. The appointment and monitoring of the custodian function for the pooled funds' underlying assets is the responsibility of the funds' governing bodies and/or investment managers. The custodians are responsible for the safekeeping of the documents relating to the ownership of the Atlas investments.

Employer-related Investments

The Trustee reviews its allocation to employer-related investments on an on-going basis and is satisfied that the proportion of the Atlas assets in employer-related investments does not exceed 5% of the market value of the total assets as at 31 March 2021, and Atlas therefore complies with legislative requirements. This will continue to be monitored going forward.

Atlas has no other employer related investments.

Review of Investment Performance

The following table shows the investment performance of the funds offered to Atlas members for the investment of contributions. All performance figures are gross of fees and are for series 1 which is the earliest launched of Atlas funds. The gross figures were calculated by using Atlas S1 fund series and adding back the fees for that series (and where relevant on a pro rata basis). The methodology is therefore suitable for monitoring the performance of each series.

Table 1 – Fund Performance to 31 March 2021

Fund / Benchmark	3 months (%)	1 year (%)	3 years (p.a.) (%)	5 years (p.a.) (%)
Atlas Active Corporate Bond Fund	-3.2	10.2	5.5	6.0
<i>Benchmark - ABI Sterling Corporate Bond Sector Average</i>	-3.2	8.7	3.8	4.2
Atlas Active Emerging Markets Equity Fund	3.7	36.8	1.8	9.9
<i>Benchmark - MSCI EM (Emerging Markets) NR</i>	1.3	42.3	7.1	13.0
Atlas Active Multi Asset Fund	1.0	20.9	4.1	5.3
<i>Benchmark - UK Consumer Price Index +4%</i>	1.1	4.8	5.6	5.8
Atlas Asia Pacific (ex Japan) Equity Tracker Fund	3.3	51.0	9.3	12.7
<i>Benchmark - FTSE Developed Asia Pacific ex Japan Index</i>	3.0	51.1	9.2	12.7
Atlas Cash Fund	0.0	0.2	0.6	0.5
<i>Benchmark - LIBD GBR 1 Week</i>	-0.2	-0.4	0.0	-0.1
Atlas Corporate Bond Index Tracker Fund	-4.8	7.0	4.1	4.4
<i>Benchmark - iBoxx Sterling Non-Gilts Index</i>	-4.0	7.2	4.1	4.5
Atlas Emerging Markets Index Tracker Fund	1.6	40.5	7.7	13.0
<i>Benchmark - FTSE Emerging Index</i>	1.6	40.6	7.7	12.8
Atlas Ethical Fund	3.4	34.3	6.6	9.2
<i>Benchmark - FTSE All Share Index</i>	5.2	26.7	3.2	6.3
Atlas Europe (ex UK) Equity Index Tracker Fund	2.0	35.7	8.6	11.3
<i>Benchmark - FTSE Developed Europe ex UK Index</i>	2.2	36.1	8.6	11.3
Atlas Flexible Access Retirement Fund	0.7	3.9	2.4	2.6
<i>Benchmark - Consumer Price Index +2%</i>	0.7	2.7	3.5	3.8
Atlas Flexible Pre-Retirement Fund	-1.9	10.8	5.4	6.9

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Fund / Benchmark	3 months (%)	1 year (%)	3 years (p.a.) (%)	5 years (p.a.) (%)
<i>Benchmark - Composite Index (Equities, Bonds inc Gilts, CPI+4%)</i>	-1.8	11.1	6.0	7.5
Atlas Global Equity Index Tracker Fund	4.4	34.2	8.0	10.7
<i>Benchmark - Composite of equity indices</i>	4.0	34.2	7.7	10.4
Atlas Inflation-Linked Annuity Target Fund	-6.9	2.8	4.6	6.1
<i>Benchmark - Composite of gilts and corporate bonds</i>	-6.9	2.6	4.4	6.0
Atlas Japan Equity Index Tracker Fund	0.9	26.8	7.5	11.9
<i>Benchmark - FTSE Japan Index</i>	1.0	26.8	7.4	11.9
Atlas Level Annuity Target Fund	-7.6	3.1	4.7	5.3
<i>Benchmark - Composite of gilts and corporate bonds</i>	-7.5	3.1	4.6	5.3
Atlas Multi Asset Absolute Return Fund	1.5	4.2	2.2	1.8
<i>Benchmark - LIBOR (6m) +5%</i>	1.2	5.2	5.7	5.6
Atlas Multi Asset Portfolio 1	4.6	35.8	8.8	10.4
<i>Benchmark - Composite Index (Equities and Bonds)</i>	3.1	35.2	10.6	11.0
Atlas Multi Asset Portfolio 2	2.6	26.6	7.7	9.7
<i>Benchmark - Composite Index (Equities, Bonds inc Gilts)</i>	2.6	26.3	7.4	9.4
Atlas Multi Asset Portfolio 3	0.5	17.8	6.4	8.5
<i>Benchmark - Composite Index (Equities, Bonds inc Gilts)</i>	0.1	18.5	7.2	9.4
Atlas North America Equity Index Tracker Fund	5.0	40.0	18.2	17.3
<i>Benchmark - FTSE World North America Index</i>	5.0	40.0	18.2	17.4
Atlas Over 15 Years Gilts Index Tracker Fund	-12.0	-10.7	3.6	5.0
<i>Benchmark - FTSE British Govt Over 15 years Index</i>	-12.0	-10.7	3.6	5.0
Atlas Over 5 Years Index-Linked Gilts Tracker Fund	-7.0	-1.7	3.7	6.4
<i>Benchmark - FTSE Inflation-Linked Gilt Over 5 Year Index</i>	-7.0	-1.7	3.7	6.4
Atlas Passive Multi Asset Fund	0.5	20.5	6.9	8.4
<i>Benchmark - LIBOR (3m) +3.5%</i>	0.9	3.6	4.1	4.0
Atlas Retirement Income Drawdown Fund	-0.1	15.7	6.1	6.8
<i>Benchmark - Bank of England Official Bank Rate Plus 3.5%</i>	-0.9	3.6	4.0	3.9
Atlas Shariah Compliant Fund	2.0	37.1	20.1	18.1
<i>Benchmark - DJ ISLAMIC TITANS 100 - Jan 99</i>	1.8	37.6	20.2	18.2
Atlas UK Equity Index Tracker Fund	6.3	28.7	3.4	6.7
<i>Benchmark - FTSE All Share Index</i>	5.4	28.8	3.3	6.4
Atlas World (ex UK) Equity Index Tracker Fund	4.0	39.1	14.5	15.4
<i>Benchmark - FTSE World ex UK Index</i>	4.1	39.3	14.5	15.3
Atlas UK Direct Property Fund	2.2	1.9	0.5	4.3
<i>Benchmark - IDP UK All Property*</i>	2.2	2.6	2.7	3.0
Atlas Sustainable Equity Fund	6.3	39.2	N/A	14.3**
<i>Benchmark - MSCI ACWI</i>	3.6	38.9	N/A	15.8**

Source: Financial Express / Scottish Widows / Fund Provider / Capita.

* Due to licensing restrictions, the since-launch data for the IDP UK All Property Index was not available, therefore the Financial Express UK Property Proxy has been used instead. ** This fund was launched on 21/10/2019 and so figures from inception

Where N/A is shown is because the fund wasn't yet launched and/or data is unavailable.

Data is displayed gross of fees and calculated by taking performance from the Atlas Series 1 funds (net of fees) and adding on the appropriately pro-rated fees for this series for 3 months, 1 year, 3 year and 5 year for each fund.

Trustee Report

Table 2 – Additional Funds available to members of the Capita Section

Fund / Benchmark	3 months (%)	1 Year (%)	3 years (p.a.) (%)	Since Inception 17/10/16 (p.a.) (%)
Capita Active Global Equity Fund	3.9	44.7	10.1	9.3
<i>Benchmark - Composite</i>	<i>4.2</i>	<i>40.2</i>	<i>10.0</i>	<i>10.0</i>
Capita Passive Global Equity Fund	5.8	43.4	10.2	10.9
<i>Benchmark - Composite</i>	<i>5.6</i>	<i>43.8</i>	<i>9.7</i>	<i>10.7</i>

Source: Financial Express / Scottish Widows / Fund Provider / Capita.

N/A indicates where a fund was only recently made available to members and/or where full performance data is unavailable for all periods since launch.

Further Investment disclosures

Further details on the investment strategy, objectives and investment risks are disclosed in note 16 on pages 119 to 122.

Trustee Report

Implementation Statement

For the year ending 31 March 2021

Welcome to the Trustee's Statement of how they implemented the policies and practices in the Scheme's Statement of Investment Principles during the year ending 31 March 2021.

Why do the Scheme's investments matter to me?

The Atlas Master Trust (the "Scheme") provides you with benefits on a defined contribution ("DC") basis (sometimes called money purchase benefits). This means that the level of income you will get in retirement will depend on the size of your pension account at the time which, in turn, will depend on the amount of contributions paid into the Scheme and the investment growth achieved on your savings over the years.

What is the Statement of Investment Principles ('SIP')?

The SIP sets out the investment principles and practices the Trustee follows when governing the Scheme's investments. It describes the rationale for the investment options which you can choose (including the default arrangement if you don't make a choice), explains the risks and expected returns of the funds used and the Trustee's approach to responsible investing (including climate change).

The Scheme's SIP was reviewed on both 24 June 2020 and 29 September 2020 during the Scheme year and the next review will take place no later than September 2023.

The following changes were made to the SIP during the last year:

- A section has been added regarding the roles and responsibilities of the investment advisors (Hymans Robertson LLP and Capita Employee Benefits (Consulting) Ltd, now called Capita Pension Solutions Ltd) and the composition and credentials of the Investment Sub-Committee ("ISC"). This is an essential part of developing accountability for tasks undertaken in relation to the investment of the Scheme.
- A new section clarifies the differences between the Primary Default, Legacy Defaults and Ancillary Defaults.
- Details have been added regarding the investment mandates of the investment managers accessed through the Scottish Widows platform.
- In line with the Occupational Pension Schemes (Investment and Disclosure) Regulations 2019 and in recognition of the responsibility, as a long-term institutional investor, to not only drive improvement in environmental, social and governance practice, but also improve the projected risk adjusted returns for members, a section has been included by the Trustee regarding their policy on voting rights and engagement. This will help the Trustee to monitor the stewardship activities of the underlying investment managers.
- A section has been added indicating how the Trustee plans to ensure that investment managers' incentives are aligned with the members' interests within the Scheme. The alignment of incentives is vital in an agent-principal relationship, and the Trustee plans to implement this by selecting managers that have beliefs consistent with their own.
- The Trustee has also detailed the intended duration of investment manager appointments. This notes that, given the long-term time horizons for members within the Scheme, the Trustee would not automatically consider replacing an investment manager off the back of short periods of underperformance, but rather keep managers under regular review to ensure that they align with the objectives and beliefs of the Trustee.

Implementation Statement

What is the Statement of Investment Principles ('SIP')? (continued)

- High transaction costs can result in a material difference in the value of member funds within the Scheme and, as such, the Trustee has included a section explaining the annual monitoring process of transaction costs. The implementation of this policy will help to limit the adverse impact of transaction costs on members' retirement incomes.

If you want to find out more, you can find a copy of the Scheme's current SIP (and the Scheme's Chair's Statement) at

<https://www.atlasmastertrust.co.uk/library/documents>

What is this Implementation Statement for?

Each year, the Trustee is required to prepare an Implementation Statement, which sets out how they have complied with the Scheme's SIP during the last year.

As demonstrated throughout this Statement, the Trustee is satisfied that:

- **The Scheme's investments have been managed in accordance with the SIP; and**
- **The provisions in the SIP remain suitable for the Scheme's members.**

How the Scheme's investments are governed

The Trustee has overall responsibility for how the Scheme's investments are governed and managed in accordance with the Scheme's Trust Deed and Rules as well as Trust Law, Pensions Law and Pension Regulations.

The Trustee has established the ISC which focuses on investment issues and makes recommendations to the whole Trustee Board.

There have been no changes to the Trustee or the governance processes during the last year.

The Trustee has delegated day-to-day investment decisions, such as which individual investments to buy and sell, within agreed broad parameters, to Scottish Widows and the underlying investment managers.

The Trustee is proactive in ensuring that their knowledge of investment matters remains up to date. For example, the Trustee received a training session from Schroders on 20 October 2020, on 'Sustainability Considerations for Pension Funds'. Furthermore, each of the three Trustee Directors took their own steps to maintain their individual knowledge and understanding.

The Trustee monitors how well their investment advisers meet the objectives agreed with them. The investment advisers have agreed the following objectives with the Trustee:

- Capita Employee Benefits (Consulting) Limited (now Capita Pension Solutions Limited):
 - Quarterly exceptions reports have a Service Level Agreement ('SLA') of 10 working days from the production of the quarterly investment report from the platform provider.
 - SMPI recommendations have an SLA of 8 weeks from a formal request from the Atlas Trustee or ISC.
 - Produce a summary of engagement activities by 31st July each year.
 - Report on transaction cost data within 4 weeks of receipt from the platform provider, with an annual report benchmarking against what would be expected of similar funds provided by 31st July each year.
 - Report on fund manager's ESG credentials by 31st July each year in respect of core funds.
 - Collate and report data on stock lending activity for core funds by 31st July each year.

Implementation Statement

- Hymans Robertson LLP is reviewed annually based on:
 - The timeliness, clarity and effectiveness of the ad-hoc work undertaken;
 - Whether the objectives set for them by the Trustee/ISC, on a case by case basis, are appropriate for that work;
 - Whether they continue to satisfy the requirements set out under Open Tender Process.

The Trustee is satisfied that during the last year:

- **The Scheme's DC governance structure was appropriate;**
- **The Trustee has maintained their understanding of investment matters; and**
- **Their investment advisers met the agreed objectives.**

How the default investment arrangement and other investment options are managed

The investment objectives and their rationale for the default arrangement and other investment options are set out on pages 61 to 63 of the SIP.

Supporting the delivery against these objectives, the Trustee carries out an annual review of the default arrangement and other investment options during the year to ensure they remain suitable for most members. This involved:

- Confirming that the default arrangement complies with the Charge Cap;
- Monitoring the investment performance of each fund;
- Monitoring the turnover of the assets in which each fund is invested;
- Considering whether the funds still meet the investment objectives the Trustee has set for the default arrangement and other investment options;
- Checking whether there have been any significant changes in the demographic profile of the Scheme's membership, members' choices of investment options and members' choices of benefits when they retire;
- Considering whether the default arrangement and other investment options still represent good value for members; and
- Obtaining investment advice, where appropriate, on any changes to the default arrangement and other investment options.

The Trustee determined that no changes were required to the investment strategy based on the reviews completed during the year. This is because the existing strategy:

- Is designed to help members receive a reasonable level of income in retirement;
- Has performed in line with Trustee expectations; and

There is a sufficient selection of investment options for members to choose from, reflecting their varying needs.

The Trustee is satisfied that the default investment arrangement and other investment options remain suitable for the majority of members.

Implementation Statement

Other default investment arrangements

The Scheme has a number of legacy default arrangements relating to employers who have transferred their previous pension arrangements into the Scheme. The Trustee has carried out their annual review of the legacy default arrangements to ensure they remain suitable for the closed group of members.

The Trustee is satisfied that the legacy default arrangement remains suitable for those members.

During the last year, the underlying components of the Atlas Direct Property Fund (the L&G Managed Property Fund and the Threadneedle Pooled Pension Funds Property Fund) were temporarily closed to the investment of new contributions and disinvestment by the fund manager as a result of liquidity concerns. The Trustee agreed that it was in the best interests of members to temporarily redirect contributions from this Fund to the Cash Fund, although members had the flexibility to choose another self-select fund if desired. The Trustee communicated with the members affected to explain the action being taken.

The Trustee's investment beliefs

The Trustee has developed a set of investment beliefs which are set out on page 63 and 64 of the SIP, which they use as a guide when making investment decisions.

There have been no changes to these beliefs in the last year.

The expected risks to your savings in the Scheme

The investment risks relating to members' benefits are described in the SIP on pages 65 to 66.

The Trustee's views on the expected levels of investment risks and returns inform decisions on the strategic asset allocation (i.e. what types of assets and areas of the world the Scheme invests in over the longer-term) for the Scheme's lifestyle option (which gradually change the funds in which your savings are invested as you approach retirement).

The Trustee believes that the main investment risks members face described in the SIP have not changed materially over the last year.

The Trustee is satisfied that the current expected rates of investment return for the types of funds described in the SIP are still reasonable relative to the risks that members face.

The Trustee's views on the long-term mix of investments for the Scheme's lifestyle options, including the default arrangement, did not change during the last year.

Implementation Statement

Platform providers and investment managers

Choice of platform providers and funds

The Trustee monitors the service of the platform provider, Scottish Widows, by:

- Benchmarking their performance against pre-determined service level agreements;
- Reviewing quarterly governance reports relating the Scheme; and
- Assessing the quality and cost of the service they provide as a part of the annual Value for Members Assessment.

The Trustee monitors the performance of the funds used by the Scheme by:

- Receiving quarterly reporting from their investment advisors on the performance of the fund range;
- Assessing the performance of the funds as a part of the annual review process; and
- Through reporting from the fund managers themselves.

There have been no changes to the platform provider and funds during the last year.

The Trustee is satisfied that the platform provider used by the Scheme remains appropriate.

Ability to invest / disinvest promptly

It's important that your contributions can be invested promptly in the default arrangement or the investment options you have chosen and that your investments can be sold promptly when you want to change where they are invested, transfer your pension pot to another scheme or your benefits are due to be paid out when you retire.

There has been an issue during the last year affecting the Atlas Direct Property Fund. In common with many funds which invest directly in commercial property (offices, shops, factories and warehouses). It was temporarily not possible to take money in or out of this fund. In the meantime, your contributions were instead invested in the Cash Fund or a self-select fund of your choice.

The Trustee believes that these are temporary issues which have not materially affected members' interests over the longer term.

Changes in where funds are invested

The Trustee monitors the volume of buying and selling of the assets (and the nature of those assets) in which each fund is invested that is carried out by the funds' investment managers. Scottish Widows provide twice-yearly reports regarding transaction costs across the fund range. The ISC monitor this as part of their annual activity.

Short-term changes in the level of turnover of the assets in which a fund is invested may be expected when a fund manager alters its investment strategy in response to changing market conditions. However, a change in the level of portfolio turnover or the time the fund invests in an asset might indicate a shift in the amount of risk the fund manager is taking, which could mean that a fund is less likely to meet the objectives for which it was chosen by the Trustee.

The Trustee is not aware of any material issues surrounding the level of trading of the funds' assets carried out by the investment managers, or their consistency with the funds' objectives.

Implementation Statement

Security of your savings in the Scheme

In addition to the normal investment risks faced by investing in the funds used by the Scheme, the security of your savings in the Scheme depend upon:

- The financial strength of the investment platform provider used by the Scheme;
- The financial strength of the relevant investment managers used by the investment platform; and
- The legal structure of the funds the Scheme invests in.

The financial strength of the platform provider and the investment managers has a bearing on the risk of losses to the Scheme's members caused by the remote chance of one of these institutions getting into financial difficulties. The legal structure of the funds used has a bearing on the degree to which the funds' assets are "ring-fenced" from the rest of the provider's or investment managers' business in the unlikely event that the provider or manager becomes insolvent.

During the last year, the Trustee, as set out in the Chair's Statement, and with the help of the investment adviser, have reviewed information from the platform provider on the provider's financial health and the structure of the funds used by the Scheme.

There have been no changes to the structure of the funds used by the Scheme during the last year. The Trustee is not aware of any material changes in the financial strength of the investment platform provider or the relevant investment managers used by the platform in the last year.

Conflicts of interest

As described on pages 67 and 71 of the SIP, the Trustee considers potential conflicts of interest:

- When choosing investment managers;
- When monitoring the investment managers' investment performance and the investment managers' approaches to investment stewardship and responsible investing; and
- When the investment manager is making decisions on where each fund is invested.

As the funds used by the Scheme are held at arms-length from the Trustee via an investment platform, the Trustee will arrange for the platform provider to report on its own investment governance of the funds including potential conflicts of interest.

The Trustee is satisfied that there have been no material conflicts of interest during the year which might affect members' benefit expectations.

Implementation Statement

Manager incentives

As described on page 72 of the SIP, the Trustee seeks to ensure that the investment managers are suitably incentivised to deliver investment performance in keeping with the funds' objectives.

The funds used by the Scheme are held at arms-length from the Trustee via an investment platform. Nevertheless, the Trustee believes it is in the platform provider's best commercial interests to ensure that the investment managers are suitably incentivised to meet their funds' investment objectives.

The Trustee selects managers that are aligned with the policies set out in the SIP to make sure that their objectives are aligned. Regular reporting ensuring that the managers are performing as expected and regular monitoring of the charges ensures that they remain competitive.

The Trustee is satisfied that the investment managers are suitably incentivised to deliver good outcomes for the Scheme's members.

Responsible Investment

The Trustee believes that responsible investing covers both sustainable investment and effective stewardship of the assets the Scheme invests in.

The Trustee's approach to responsible investing has not changed during the last year.

Sustainable Investment

The Trustee believes that investing sustainably is important to control the risks that environmental factors (including climate change), social factors (such as the use of child labour) and corporate governance behaviour (called "ESG" factors) can have on the value of the Scheme's investments and, in turn, the size of your retirement benefits.

The Trustee periodically reviews the platform provider's and investment managers' approaches to sustainable investing and expects their investment managers to be proactive in handling these risks. In addition, the Trustee reviewed the suitability of the sustainable fund during the year.

The Trustee is satisfied that, during the last year, the Scheme's investments were invested in accordance with the policies on sustainable investing set out in the SIP.

Investment stewardship

As described on page 7 of the SIP, the Trustee believes it is important that the investment managers, as shareholders or bond holders, take an active role in the supervision of the companies in which they invest, both by voting at shareholder meetings and engaging with management on major issues which affect a company's financial performance (and in turn the value of the Scheme's investments).

As the Scheme's investments are held at arms-length from the Trustee and members through an investment platform operated by Scottish Widows, the Trustee is not able to instruct the investment managers how they should vote on shareholder issues.

The Trustee nevertheless:

- Chooses investment managers whose voting policy are consistent with the Scheme's objectives;
- Expects investment managers to vote in a way which enhances the value of the funds in which the Scheme invests;
- Monitors how the investment managers exercise their voting rights.

Implementation Statement

How does the Trustee monitor this?

The Trustee periodically reviews the platform provider's and investment managers' approaches to stewardship including voting and engagement policies.

The Trustee is making arrangements to receive quarterly reports from the platform provider on how the investment managers have voted at shareholder meetings and what topics investment managers have discussed with the companies in which they invest.

The funds with voting rights attached that are available to members as part of the default fund range or the self-select fund range are listed below along with summary voting statistics for each fund.

- Atlas Active Emerging Markets Equity Fund;
- Atlas Active Multi Asset Fund;
- Atlas Asia Pacific (ex Japan) Equity Index Tracker Fund;
- Atlas Emerging Markets Index Tracker Fund;
- Atlas Europe (ex UK) Equity Index Tracker Fund;
- Atlas Global Equity Index Tracker Fund;
- Atlas Japan Equity Index Tracker Fund;
- Atlas North American Equity Index Tracker Fund;
- Atlas Sustainable Equity Fund;
- Atlas World (ex UK) Equity Index Tracker Fund;
- Atlas UK Equity Index Tracker Fund;
- Atlas Retirement Income Drawdown Fund;
- Atlas Ethical Fund;
- Atlas Multi Asset Absolute Return Fund;
- Atlas Passive Multi Asset Fund; and the
- Atlas Shariah Compliant Fund;

Implementation Statement

The table below provides a summary of the voting statistics for the Scheme year for the Default funds:

Fund Name	No. of resolutions eligible to vote	% resolutions voted	% resolutions voted for management	% resolutions voted against management	% resolutions abstained and did not vote
Atlas Multi-Asset Portfolio 1	8,892	95.2%	86.3%	8.2%	5.6%
Atlas Multi-Asset Portfolio 2	8,892	95.2%	86.3%	8.2%	5.6%
Atlas Multi-Asset Portfolio 3	8,892	95.2%	86.3%	8.2%	5.6%

Source: Schroders

*Some rows may not sum to 100% as a result of rounding.

Implementation Statement

The table below provides a summary of the voting statistics for the Scheme year for the Self-Select funds:

Fund Name	No. of resolutions eligible to vote	% resolutions voted	% resolutions voted for management	% resolutions voted against management	% resolutions abstained and did not vote
Atlas Active Emerging Markets Equity Fund	1,072	99.1%	90.7%	7.8%	1.5%
Atlas Active Multi Asset Fund	11,052	94.0%	92.6%	11.7%	7.39%
Atlas Asia Pacific (ex-Japan) Equity Index Tracker Fund	3,774	100%	74.2%	25.8%	0.0%
Atlas Emerging Markets Index Tracker	627	100%	95.2%	2.2%	2.6%
Atlas Europe (ex UK) Equity Index Tracker Fund	11,412	99.9%	84.2%	15.3%	0.5%
Atlas Global Equity Index Tracker Fund	78,682	99.9%	84.2%	14.2%	0.9%
Atlas Japan Equity Index Tracker Fund	6,518	100%	86.1%	13.9%	0.0%
Atlas North American Equity Index Tracker Fund	9,495	100%	71.8%	28.2%	0.0%
Atlas Sustainability Equity Fund	5,482	94.4%	91.0%	8.8%	0.19%
Atlas World (ex UK) Equity Index Tracker Fund	37,840	99.8%	80.2%	19.2%	0.6%
Atlas UK Equity Index Tracker Fund	12,574	100%	92.9%	7.1%	0.0%
Atlas Retirement Income Drawdown Fund	114,644	99.8%	81.7%	17.7%	0.6%
Atlas Ethical Fund	761	91.46%	88.0%	2.7%	9.3%
Atlas Multi Asset Absolute Return Fund	8,676	77.7%	92.5%	7.2%	0.6%
Atlas Passive Multi Asset Fund	115,604	99.0%	81.7%	17.7%	0.6%
Atlas Shariah Compliant Fund	1,597	91.6%	87.8%	12.2%	0.0%

Source: Scottish Widows

*Some rows may not sum to 100% as a result of rounding.

Implementation Statement

The Trustee also considers how the investment managers voted on specific issues. The Trustee considers 'significant votes' to be either companies with relatively large weightings in the funds members invest in (i.e. are in the top 10 holdings), or where there were shareholder issues that members are expected to have an interest. Some of the significant votes for the year were:

	Apple Inc	Facebook Inc	Microsoft Corp	Samsung Electronics Co Ltd	Taiwan Semiconductor Manufacturing Co Ltd
Resolution	23 February 2021 Proxy Asset Amendments	27 May 2020 Report on Civil and Human Rights Risk Assessment	2 December 2020 Report on Employee Representation on the Board of Directors	17 March 2021 Approve Financial Statements and Allocation of Income	9 June 2021 Approve Business Operations Report and Financial Statements
Legal & General Investment Management	For	For	-	For	For
Schroders	For	Against	Against	For	For
Lazard Asset Management	-	Against	-	-	-
Baillie Gifford	Against	Against	Against	For	For
BlackRock	Against	-	For	For	For
Comments	Baillie Gifford opposed this resolution as they are already comfortable with the provisions in place. Schroders and LGIM believe the resolution would enhance shareholder rights.	Only LGIM voted in favour of the resolution, with the other managers feeling the report is not necessary.	Baillie Gifford and Schroders are satisfied with the current director selection process.	All managers voted for this resolution; no rationale was provided.	All managers voted for this resolution; no rationale was provided.

Source: Investment Managers and Proxy Insight

Please note: Not all underlying managers have been included in the table as they hold a very small value of member assets.

Implementation Statement

How do investment managers implement their votes?

The managers often make use of proxy voting to inform their decision making. The managers use the following organisations as proxies for their voting activity:

Manager	Comment on approach
Legal & General Investment Management	The Governance and Responsible Investment team uses research from ISS, ABI, Glass Lewis together with collaboration with other investors and input from LGIM's own active portfolio managers to reach a conclusion on each resolution.
Schroders	The majority of resolutions Schroders target incorporate specific corporate governance issues which are required under local stock exchange listing requirements.
Veritas	Veritas uses Institutional Shareholder Service (ISS) to execute voting on behalf of clients.
BlackRock	BlackRock uses ISS for vote instruction and they also use proxy research firms for custom recommendations.
Lazard Asset Management	Lazard's proxy voting process is administered by members of its Operations Department and currently subscribes to advisory and other proxy voting services provided by Institutional Shareholder Services Inc. and Glass, Lewis & Co.
Baillie Gifford	The firm's Governance and Sustainability team oversees their voting analysis and execution. Baillie Gifford does not outsource any part of the responsibility for voting to third-party suppliers. They utilise research from proxy advisers for information only.
Dimensional	Dimensional has engaged Institutional Shareholder Services (ISS) to provide information on shareholder meeting dates, research on proxy proposals, and voting recommendations based on our proxy voting policies and procedures. ISS also provides vote execution through its proprietary voting platform.
HSBC	HSBC use ISS for custom recommendations based on their own voting guidelines.
F&C	BMO employs ISS who auto-executes, without further guidance, the majority of votes in accordance with the Proxy Voting Guidelines.
The Trustee is satisfied that the investment managers' voting record on the companies in which their funds invest was aligned with the stewardship policy described in the SIP.	

Implementation Statement

The following funds do not have voting rights attached to them:

- Atlas Active Corporate Bond Fund;
- Atlas Over 15 Years Gilts Index Tracker Fund;
- Atlas Over 5 Years Index-Linked Gilts Index Tracker Fund;
- Atlas Cash Fund;
- Atlas Corporate Bond Index Tracker Fund;
- Atlas Flexible Access Retirement Fund;
- Atlas Inflation-Linked Annuity Target Fund;
- Atlas Level Annuity Target Fund; and
- Atlas UK Direct Property Fund.

Ethical Investing

The Trustee recognises that some members will have strong views on where their pension savings should be invested.

The Scheme offers members a choice of funds which:

- Meet certain sustainability criteria (Atlas Sustainable Equity);
- Ethically screens companies before investing (Atlas Ethical Fund); and
- Allow members to invest in a way that is aligned with their religious views (Atlas Shariah Compliant Fund).

Nevertheless, the Trustee recognises that it is not possible to cater for everyone's views on non-financial/ethical matters.

The Trustee monitors the investments held by the Scheme's ethical investment options. The Trustee also monitors developments in ethical investing funds which could be appropriate to the Scheme's members.

The Trustee's approach to ethical investing has not changed during the last year and they are satisfied that the Scheme offers ethical investment options for members in accordance with the SIP.

Communication and member engagement

The Trustee's approach to communicating the Scheme's investment options and investment governance have not changed during the last year.

During the last year, the Trustee undertook the following to support member engagement and obtain member feedback:

- Ran a member engagement forum;
- Received and analysed member feedback; and
- Created a Web-ex for members, to explain investments and provide reassurance during the COVID-19 pandemic.

Implementation Statement

The key points to emerge from engagement with members during the last year were:

- Members raised general concerns around market volatility with the onset of the pandemic. This helped to inform regular market updates that were visible through the member portal and provided performance updates and emphasised the significance of long term investment horizons in accepting short term risk.
- Members also raised concerns regarding climate change and what Atlas were doing in this regard. Whilst the Trustee recognise that there are always areas for improvement with regard to climate issues, they are satisfied that they are addressing member concerns by:
 - Introducing two new funds to the range that address target aligned with climate conscious goals; and
 - Notifying members of any changes in the Winter Newsletter.

The Trustee believes that they have sought effective member feedback which has enabled the Trustee to maintain strong conviction in the performance of the Scheme.

Limitations and missing information

The Trustee has been unable to obtain the following information for this Implementation Statement despite requesting it from Scottish Widows in August 2021:

- Voting statistics for the Capita Active Global Equity Fund.
- The Atlas Flexible Pre-Retirement Fund' voting statistics have not been included in the voting statistics table, however all of the underlying equity funds (which make up a minority of the overall fund) are represented in the table.

The Trustee understands that the collection of this data is a common issue in the industry at present and will work with Scottish Widows to make sure that this is available in future.

Looking forwards

In the next Scheme year, which will be covered by next year's Implementation Statement, the Trustee intends to undertake the following actions in relation to the SIP:

- Introduce a section detailing their requirements and responsibilities in relation to the new Taskforce on Climate-related Financial Disclosures (TCFD) requirements.

More information

We hope this Statement helps you understand how the Scheme's investment of your savings for retirement has been managed in the last year.

If you have any questions or feedback, please contact memberenquiries@atlasmastertrust.co.uk



Alan Whalley
Chair of the Trustee
16 September 2021

Trustee Report

Compliance Matters

The following paragraphs are intended to give Atlas Members information about where they can find additional help if they encounter difficulties in resolving a pension query whether in relation to Atlas or to any other pension arrangement.

MoneyHelper

The Money and pensions Service ("MAPS") was created in 2019 as a single body to bring together the services previously delivered by The Pensions Advisory Service ("TPAS"), the Money Advice Service and Pension Wise, providing information to the public on matters relating to workplace and personal pensions. With effect from 30 June 2021 MAPS has been re-branded as MoneyHelper but still offers all the same services.

Website: <https://www.moneyhelper.org.uk>

Email: pensions.enquiries@moneyhelper.org.uk

Tel: 0800 011 3797

Pensions Ombudsman

The Pensions Ombudsman will, assist members and beneficiaries of the Trust in connection with difficulties which they have failed to resolve with the Trustee or Administrator of the Trust and may investigate and determine any complaint or dispute of fact or law in relation to an occupational pension scheme.

The Pensions Ombudsman may be contacted at 1st Floor, 10 South Colonnade, Canary Wharf, London, E14 4PU.

Telephone: 0800 917 4487

Early resolution email: helpline@pensions-ombudsman.org.uk

Email: enquiries@pensions-ombudsman.org.uk

Pensions Regulator

The Pensions Regulator is able to intervene in the running of the Trust where trustees, employers or professional advisers have failed in their duties.

The Pensions Regulator may be contacted at Napier House, Trafalgar Place, Brighton, BN1 4DW.

Telephone: 0345 600 7060

Pension Tracing Service

A register is maintained to help current or former members to trace their pension rights. Atlas is registered and relevant details have been given to the Pensions Tracing Service who can be contacted at:

Pensions Tracing Service
9, Mail Handling Unit A
Wolverhampton
WV98 1LU

Trustee Report

Compliance Matters

General Data Protection Regulation ("GDPR")

The General Data Protection Regulation ("GDPR") is a regulation by the European Parliament intended to strengthen and unify data protection for all individuals within the EU. It also addresses the export of personal data outside the EU. GDPR came into force from 25 May 2018 and the Trustee worked with its advisers to formulate its GDPR policy so that it was compliant.

From 1 Jan 2021, the UK GDPR came into effect which will run alongside the DPA 2018, and the EU GDPR to which all EU nations remain subject and this includes where Capita operate in the EU. This ensures that we have adequate provision for the safe processing of data in the UK and in the EU/EEA.

Trustee Report

Statement of Trustee Responsibilities

The Financial Statements, which are prepared in accordance with UK Generally Accepted Accounting Practice, including the Financial Reporting Standard applicable in the UK (FRS 102) are the responsibility of the Trustee. Pension scheme regulations require, and the Trustee is responsible for ensuring, that those Financial Statements:

- show a true and fair view of the financial transactions of Atlas during the year and of the amount and disposition at the end of the year of its assets and liabilities, other than liabilities to pay pensions and benefits after the end of the year; and
- contain the information specified in Regulation 3A of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, including making a statement whether the Financial Statements have been prepared in accordance with the relevant financial reporting framework applicable to Occupational Pension Schemes.

In discharging the above responsibilities, the Trustee is responsible for selecting suitable accounting policies, to be applied consistently, making any estimates and judgments on a prudent and reasonable basis, and for the preparation of the Financial Statements on a going concern basis unless it is inappropriate to presume that Atlas will not be wound up.

The Trustee is also responsible for making available certain other information about Atlas in the form of an annual report.

The Trustee also has a general responsibility for ensuring that adequate accounting records are kept and for taking such steps as are reasonably open to it to safeguard the assets of Atlas and to prevent and detect fraud and other irregularities, including the maintenance of an appropriate system of internal control.

The Trustee is responsible under pensions legislation for securing that payment schedules are prepared, maintained and from time to time revised showing the rates of contributions payable towards Atlas by or on behalf of the employers and the active members of Atlas and the dates on or before which such contributions are to be paid. The Trustee is also responsible for keeping records in respect of contributions received in respect of any active member of Atlas and for adopting risk-based processes to monitor whether contributions are made to Atlas by the employers in accordance with the payment schedules. Where breaches of the schedules occur, the Trustee is required by the Pensions Acts 1995 and 2004 to consider making reports to the Pensions Regulator and the members.

Trustee Report

Contact for Further Information

Members are entitled to inspect copies of documents giving information about Atlas. In some circumstances, copies of the documents can be provided, but a charge to cover the costs of postage and copying may be made for some of them.

Any enquiries or complaints about Atlas, including requests from individuals for information about their benefits or Atlas documentation, should be sent to:

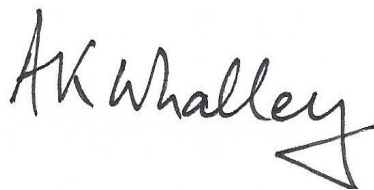
Atlas Master Trust
c/o Capita Pension Solutions Limited
PO Box 555
Stead House
Darlington
DL1 9YT

Email: memberenquiries@atlasmastertrust.co.uk

Approval of the Annual Report

This Report has been approved by the Trustee.

Approved by the Trustee on 26 October 2021 and signed on its behalf by:



Director



Director

Governance Statement

Statement of the Chair of the Trustee of the Atlas Master Trust for the period 1st April 2020 to 31 March 2021

This statement is produced in accordance with regulation 23 of the Occupational Pension Schemes (Scheme Administration) Regulations 1996 (the Regulations). The four Appendices (1. Value for Money Assessment, 2. Statement of Investment Principles, 3. Costs and Charges and 4. Schroders Sustainable Multi Asset Fund) are an integral part of this Statement and should be read in conjunction with it.

The current Trustee Directors of the Trustee are:

- Alan Whalley (Chair of Trustee)
- BESTrustees Limited represented by Penny Green
- PAN Trustees UK LLP represented by Steve Delo.

I hereby confirm that I, Alan Whalley, as one of the three Directors of the Atlas Trustee (Atlas Master Trust Trustee Limited), am the appointed Chair of the Atlas Master Trust (the 'Trust'). In accordance with regulation 23 of the Regulations I hereby confirm, on behalf of the Trustee Board, in relation to the Trust that:

None of the Trustee Directors are affiliated (that is, attached or connected) to the Funder/Founder (Capita Pensions Solutions Limited or its wider Group (Capita Plc) except by virtue of our appointment as Trustee Directors of Atlas. None of us receives any remuneration from, or is otherwise affiliated to, any of our key service providers or their connected businesses. All of the Trustee Directors (including the Chair) were therefore "non-affiliated" during the year.

There have been no appointments to the Trustee Board or resignations from it during the period.

Details of the arrangements that we have which encourage members, or their representatives, to make their views about the Trust known to us are included in the 'Member Engagement' section of this statement.

Covid 19

We cannot continue this report without acknowledging the ongoing devastation of the Covid19 pandemic, which we have been living with for over 18 months. Whilst vaccines are bringing us hope of a return towards normality, there appears to be some way to go before it is over, if it ever will be as it seems we will need to learn to live with the virus. I would like to offer my sincere and heartfelt condolences to everyone that has been impacted by the pandemic.

As I mentioned in last year's statement the main areas of concern for the Board have been our investments and member administration services. There is more detail on both of these elsewhere in this report, including in our Value for Members assessment, but in both areas we have had resilient performance and in particular, I'm pleased with how our administration services have adapted to remote working. I and the Board will continue to monitor closely the pandemic and we're ready to respond proactively to developments as required.

Governance Statement

Default Performance Review

We review the performance of our default investments each quarter. The pandemic has made markets uncertain and volatile, so it's important to remember that our strategy for our default investment is long-term - members could be invested with Atlas for 50 years or more throughout the accumulation cycle (the time when they are growing their pot) and the decumulation cycle (the time when they are taking money from their pot). Whilst we recognise that some members will have relatively short-term investment horizons because they are closer to retirement, the average age of our membership is just over 40, so most members have *at least* one to two decades of investment in growth assets ahead of them. (Growth assets are assets which are expected to grow the fastest but which also tend to be the most volatile – meaning they are more suitable for members who are further away from retirement rather than those who are planning to take benefits in the shorter term.) Therefore we set long-term investment strategies but we monitor performance on a quarterly basis, in the main to ensure that Schroders (who are responsible for managing the core funds that create our default strategy) continue to act in accordance with our investment mandate with them (see tables below). The mandate allows Schroders' investment professionals the necessary flexibility to invest tactically and strategically in order to achieve the long-term objectives we have set them. Our quarterly reviews are therefore less concerned with short-term performance, which we know can be an unreliable indicator of long-term performance success, and more to help us determine if there are indicators of systemic issues we need to be concerned about.

In addition to the quarterly reviews, the Investment Sub-Committee also undertook a review of the Trustee's investment strategy, beliefs, de-risking path and whether Schroders were still a suitable fund manager for Atlas (see below). As a result of this review, the Trustees have updated their investment beliefs, kept the de-risking path the same and concluded that Schroders remains a suitable fund manager. As part of this review the Trustee has strengthened its overall focus on Environment, Social and Governance (ESG) issues.

Our Investment mandate with Schroders is for them to manage our three core Multi Asset Portfolios (MAPs). MAP1 has the higher equity weighting, and is therefore the most volatile fund, and MAP 3 has the lowest equity ratio and therefore has the least volatility. The long term strategic asset weightings of each MAP are shown in the table below.

	MAP1	MAP2	MAP3
Global Equity (Unhedged)	40%	30%	20%
Global Equity (Hedged)	40%	30%	20%
Global Sovereign Bonds (Hedged)	10%	20%	30%
Global Corporate Bonds	10%	20%	30%

Our Primary Default strategy uses MAP1 during the accumulation stage (where a 'racier' asset mix is used to capture expected long-term growth outperformance). 'gliding' into a mixture of MAP 3 (75%) and cash (25%) as members reach their Selected Retirement Age.

Governance Statement

In order to give Schroders the flexibility to seek value and opportunity in achieving the long-term fund objectives, the investment mandate provides 'room for manoeuvre' by allowing them to hold different weightings within a pre-agreed minimum and maximum range. This includes flexibility to have more or less exposure to exchange rate fluctuations. The Permitted Weightings are shown in the table below.

Permitted Weighting	MAP1	MAP2	MAP3
Global Equity	65% - 95%	40% - 75%	25% to 55%
Bonds	5% to 30%	20% to 50%	40% to 70%
Cash	0% to 20%	0% to 20%	0% to 20%
Sterling Exposure	50% to 100%	60% to 100%	70% to 100%

Schroders attend our Investment Sub Committee meetings, when appropriate. Ahead of each sub-committee meeting, they provide investment reports to us which include a narrative of how (and why) they have positioned the portfolios, which allow us to monitor performance achieved and the level of risk in the portfolio to achieve that performance, and that our mandates have been met. Our Executive Team (the employees dedicated to supporting Atlas on a day to day basis) maintain regular contact with Schroders and schedule regular calls with them to discuss performance, portfolio positioning and market outlook. These measures allow us to satisfy ourselves that Schroders have continued to act in accordance with the agreed investment mandates, including maintaining the Permitted Weightings shown in the tables above.

Default Investment Strategy Review

Because it is so vitally important to member outcomes, our Annual Planner requires us not only to monitor performance (as described above) but also to review our default investment strategy each year. Strategy is for the longer term; therefore we do not expect to make changes each year but we do want to continually challenge ourselves to ensure that we remain satisfied with the strategies that we have in place.

As a result of our review process and bearing in mind the recent investment strategy review undertaken in ESG, it was agreed by the Trustee that no further changes should be made. **As a result in this reporting period, no changes were made.** The Trustee has been pleased to note that Schroders has delivered strong performance over the last year both in terms of absolute return and against the benchmark we have set them. In last year's report I mentioned that we were in the exploratory stage of considering whether to introduce a passive alternative default strategy. We have decided not to proceed with this for the time being but may re-consider this at a later date.

Governance Statement

In last year's report, we described how we take into account non-financial matters in respect of our investments, and in particular how we take into account ESG issues. As per last year's report, I confirm that we continue to take into account ESG issues and **currently this is the only non-financial matter that we take into account, although arguably in the long-term we believe that positive ESG factors are likely to have a positive impact on returns or reduce the risk of achieving those returns. This position was unchanged throughout this latest reporting period.**

Our Statement of Investment Principles says the following about our ESG philosophy.

We believe that our primary duty is to protect the long-term financial interests of our members and that this duty can best be satisfied, in respect of the Primary Default and lifestyle strategies in particular, by adopting a focused, structured and rigorous approach to investing sustainably. We have a strong conviction that ESG issues, such as climate change and human rights can and do affect the performance of investment portfolios over the long-term and that this effect will accelerate in the future as corporate behaviours and environmental footprints are measured more critically. Consequently, ESG factors must therefore be considered alongside more traditional financial factors if we are to properly satisfy our fiduciary duty.

In accordance with this belief, we have directed Schroders, our investment partner responsible for managing the funds which are used in Atlas' Primary Default strategy to redirect the equity component of Atlas' assets managed by them into two funds which have ESG at the heart of the investment process. These are:

- 1. The Schroders Sustainable Multi Factor Equity (SMFE) Fund. This is a global equity strategy that integrates ESG analysis into a systematic investment approach.*
- 2. The Schroders Global Sustainable Growth Fund (SGSG). This fund provides balance to SMFE and also has a strong ESG focus embedded in the investment process, focusing on high quality companies while also assessing their long-term approach to managing ESG risks.*

The target for Atlas Multi Asset Portfolio 1 (which is the fund used in the accumulation phase of our Primary Default Fund) is for 60% of the equity content to be invested in these two funds with an approximate split of 2/3rd in SMFE and 1/3 in SGSG. The remaining equity allocation will be invested in futures, which are used for shorter term asset allocation views for portfolio efficiency. A similar structure applies to Atlas Multi Asset Portfolios 2 and 3, although each has a lower equity allocation than Atlas Multi Asset Portfolio 1.

Because these changes have not increased the investment fees, and because we believe that this strategy will provide higher returns over the longer-term than a strategy which does not actively integrate ESG principles, it was felt to be unnecessary to canvass members views before implementing them.

In respect of the Ancillary Defaults/self-select options, we have determined that to the greatest extent possible, whilst still recognising the desire to provide appropriate choice to enable self-select members to pursue their own investment beliefs, the investment options that we make available to Atlas members will be restricted to those offered by fund managers who are signatories to the United Nations Principles for Responsible Investing (PRI).

Governance Statement

Implementing Our ESG Beliefs

As per the ESG philosophy above, in addition to Schroders investing the active equity components of our three Multi Asset Portfolios (MAP) Funds in their Sustainable Multi Factor Equity Fund (SMFE), in August 2020 they also invested a proportion of the fund in the Global Sustainable Growth Fund (GSG). This therefore increased the proportion of the portfolio that is invested in explicit sustainable investments.

The Board, in conjunction with our Schroders investment team considered other active global equity strategies that integrated ESG and agreed that GSG would provide a good diversifier to the existing SMFE allocation. The GSG fund offers the right balance while having a strong ESG focus embedded in the investment process. The fund in its current format was launched in 2017 and builds on the well-established investment process of Schroders global equity team, which focuses on high quality companies while also assessing their long-term approach to managing ESG risks.

The GSG fund philosophy is based on the belief that only companies demonstrating positive sustainability characteristics, defined as managing the business for the long-term, and recognising their responsibilities to a broad group of stakeholders, will be able to maintain their growth and returns over the long-term. In addition, Schroders believe that when aligned with strong underlying fundamentals, this can result in consistently stronger earnings growth which is often under appreciated by the market.

The SMFE Fund aims to outperform the MSCI All Country World Index but aims to achieve that with less than half the carbon intensity of that index. In addition it excludes industries such as tobacco, weapons and gambling. Equally importantly, SMFE builds on Schroders Global Multi Factor Equity Fund by adding a fifth, ESG factor to the four factors already used in the Global Multi Factor Equity Fund. (Factors are characteristics of stocks which have historically led to investment outperformance and which facilitate a low cost way to actively manage a portfolio, by seeking out stocks with those particular characteristics. For investment savvy readers, these other factors are Momentum, Quality, Value and Low Volatility.)

SMFE uses a propriety process developed by Schroders, called Sustainex, which measures the positive and negative ESG attributes of individual companies – the impact they have on society and the environment. It then translates these impacts into financial terms and uses that data to identify whether firms are in environmental and societal debit or credit. In simple terms, it asks the question 'if this company was handed a bill for the costs they impose, or a credit note for the good that they do, how large or small would that debit or credit be? By placing a notional value on the size of the debit or credit, investment preference can then be given to companies in a particular sector or location that have the most positive impact, or which have the least negative impact.

Some equity components within the MAP Funds may from time to time be invested in other equity instruments such as derivatives. This flexibility is necessary to allow Schroders to achieve the investment objectives we have set them, which may not be possible if they are constrained. Importantly, however, all of the investments in the MAP Funds are made through a process which Schroders describe as 'Integrated'. This means that sustainability is a fundamental building block of the investment process in which ESG factors are systematically integrated into the investment process and can be clearly evidenced.

Governance Statement

Implementing Our ESG Beliefs (continued)

From October 2021, Atlas will be required to comply with the Task Force on Climate Related Financial Disclosures (TCFD) disclosure guidelines. As I said last year, ESG is an ever increasing element in investing and we welcome the additional focus that TCFD will bring on climate change. I, my Board and the Executive team are working on ensuring we have all the relevant policies in place and I am pleased that the work we have done on ESG over the last few years means we are well placed to continue our ESG journey. We will continue to work with our fund managers on ESG issues, including improved reporting of the actions they are taking in stewardship as well as in integrating ESG considerations into their investment process. In this respect we have been working with Schroders and are pleased that we are getting greater clarity on how the Multi Asset Funds perform against the UN Sustainable Development Goals, including climate change.

Our other investment partners

In addition to Schroders, we have a number of investment partners. These are:

- Legal & General Investment Management Limited – Passive, multi-asset growth and property funds.
- Standard Life Investments Limited – Multi-asset growth fund.
- Lazard Asset Management Ltd – Active emerging markets equity fund.
- BlackRock Investment Management (UK) Ltd – Money market fund.
- M&G Investments Ltd – Active corporate bond fund.
- Bank of Montreal (formerly F&C) Global Asset Management – Ethical fund.
- HSBC Asset Management (UK) Ltd – Shariah compliant fund.
- Columbia Threadneedle Investments – Property fund
- Invesco – Multi Asset Absolute Return Fund
- Nordea – Multi Asset Absolute Return Fund

As we mentioned in our last report, each of these partners is a signatory to the United Nations Supported Principles of Responsible Investment (PRI). (For more information see <https://www.unpri.org>)

Investment Notes

Our investment strategy is based on a set of Investment Beliefs which are described in our Statement of Investment Principles attached as Appendix 2.

- Our default strategies form an important part of our Value for Members assessment, which should be read in conjunction with this summary to provide greater detail about the review process.

Governance Statement

Investment Notes (continued)

- Our default strategy is subject to regular reviews to ensure it remains appropriate to the needs of members. We monitor its performance on at least a quarterly basis. It is reviewed both by us and by our Investment Sub Committee. We formally re-assess its objectives and suitability annually, in accordance with our Annual Planner. Because the average member has a long-term investment horizon, our philosophy is to look at investment growth over the longer-term and therefore whilst we monitor performance on a quarterly basis, we would not expect to take precipitous action (such as replacing a manager) unless performance was poor over a significant period of time and we lost belief in the manager's ability to deliver the long-term objectives we have set them.
- We review our Investment Beliefs and our SIP annually, in accordance with our Annual Planner.

Member Engagement Activities: During the course of this reporting period, we have continued our efforts to engage with members to better understand their viewpoints via the Member Forum and to learn more about what they would like us to do better for them. For example, we have updated our retirement guide for which we had input from the Member Forum in the design of this.

We continue to take into account member views and their feedback. We believe we've built the 'voice of the member' into the heart of Atlas. We continue to receive and analyse feedback received from members after interaction with the service team, monitor website usage statistics, identify trends, review success measures, and consider member suggestions for improving the services provided.

Our Member Engagement Forum remains vitally important to us and we encourage as many members as possible to join it, which they can do by emailing us at Atlasmemberforum@capita.co.uk

We publish Trustee Newsletters regularly which cover contemporary issues and matters of general interest.

In addition, at the height of the pandemic we created a Web-ex for members to explain investments and provide reassurance at an uncertain time.

Last year we changed the format of our Benefit Statements (which we call annual updates) to make them as informative and easy to understand as possible. The feedback on this was positive, particularly the inclusion of 'personas' showing how the pandemic impacted individuals. We therefore plan to continue with the new style of annual update.

Our member engagement strategy focusses on an online journey including using downloadable video and audio content so that members can learn more about pensions and related topics 'on the go' and at a time of their choosing. As part of this strategy we launched our new member website. which provides access to information and tools. In addition, we have begun the process of transitioning members to a new member portal, in a phased approach. Last year I mentioned that we are developing a digital solution for delivery and as part of this process we have launched a trial of a WhatsApp contact tool and continue work to develop the App.

Governance Statement

Trustee and Sub Committee meetings

Over the reporting period we held:

- Four Trustee meetings;
- Five Investment Sub Committee meetings
- Four Engagement Sub Committee meetings
- Four Risk & Operations Sub Committee meetings;
- One Risk & Operations Sub Committee Working Group meeting.

Our Discretions and Appeals Sub Committee, which deals primarily with the payment of death benefits to beneficiaries, meets by phone, video link or on-line in order to speed-up the decision-making process.

At least one Trustee Director is a member of each of our Sub Committees. Paul Trickett, the Chair of our Investment Sub Committee is, like the Trustee Board, independent of and unaffiliated with Capita Group and any of Atlas' service providers. The remaining Sub Committee members are drawn from the Atlas Executive and wider Capita Group.

The Trustee Board and Sub Committees communicate and interact regularly between formal meetings via email, telephone and in person. We consider that our time-commitment to Atlas, and our desire to involve ourselves on a day-to-day basis, is a key attribute of our governance style and a contributor to the value that Atlas offers. This has been particularly important throughout this unprecedented and fast-evolving Covid-19 pandemic.

Master Trust Authorisation

All Master Trusts operating in the UK must be authorised by The Pensions Regulator (TPR).

Atlas' authorisation was confirmed in August 2019. We are now subject to ongoing supervision by The Pensions Regulator.

Core Financial Transactions

Core financial transactions include transactions such as investment of contributions, transfers in and out of the Trust, payments from the Trust to members and transfers/switches of assets between different investments. These are vitally important transactions which we therefore monitor carefully for both accuracy and process timing. We monitor these transactions through;

- Our Risk & Operations Sub Committee;
- Administration Reports reviewed at each quarterly Board Meeting (we can and do ask for more frequent reports if we have any cause for concern);
- Atlas' Head of Operations, who is in frequent (often daily) contact with our operations team.

We are pleased to report that all core financial transactions throughout the period have been processed by Capita promptly and accurately and in accordance with the Service Level Agreements (SLAs) that we have in place. A summary of the performance of core financial transactions against SLAs is shown below.

Month	Apr 20	May 20	Jun 20	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21
SLA	96%	95%	91%	91%	95%	94%	95%	90%	91%	92%	92%	94%

Governance Statement

Capita had to change its operating model and way of working to deal with the pandemic. Against this backdrop the SLA's have held up well, albeit there have been variations month to month. We're particularly pleased that all member services have remained fully open throughout the pandemic.

Bank reconciliations are performed daily and payments out are requested and authorised by two different people to improve accuracy and reduce fraud and error risk. All such transactions are monitored and reported quarterly through the formal SLAs we have in place with Capita Pension Solutions.

We have a contribution process in place which helps identify late or inaccurate payroll contributions. This process enables us to monitor that contributions are invested within the statutory timeframe and also to work with any of our participating employers who may experience difficulties with the payroll process. This can occur, for example, with changes of personnel or payroll IT. Over the course of the reporting period there were no late payments made by any of the participating employers.

Master Trust Assurance

Atlas' Audit Assurance Framework ("AAF") Report provides further details about how Capita manages and controls core financial transactions, and about the oversight we apply as part of our own control framework. Our latest AAF report is available at <http://www.atlasmastertrust.co.uk/library/documents>.

Charges

Atlas charges members a percentage of their pension pot for running the Trust. This includes administration and investment, professional advisory fees (for example, legal and investment advice), Trustee fees, statutory and assurance audits and regulatory fees such as the TPR levy and Fraud Compensation levy.

The percentage charge to members is calculated on an 'underwritten pricing model'. This means that the charge reflects each employer's specific financial metrics (that is, the number of members in their section, their average age, average size of contributions and any assets to be transferred-in). Generally speaking, there is a lower charge for members who work for larger organisations due to the economies of scale. This leads to a structure whereby there are different fund series.

Some employers may choose to pay a fee direct to Atlas, which has the effect of lowering (or eliminating altogether) the percentage member charge that would otherwise have been levied. The charge in respect of all investment options available to members of each section, is described in the Investment Guide for that section. The annual percentage charged (Total Expense Ratio) depends on the members' section and the investments they choose.

The charges for each section of Atlas are set out in Appendix 5.

Governance Statement

Investment Transaction Costs

Transaction costs play a vital role in the investment returns that members receive. These are the costs incurred by investment managers in pursuit of their investment objectives. They include activities such as buying and selling stocks, taxes payable on stock purchases, commissions to third parties and costs of third-party investment research. Different investment managers and funds have different investment objectives, and therefore transaction costs can and do differ significantly – not just between different investment funds but also within the same fund over a period of time. That is, transaction costs in any particular investment fund in any year may be more or less than the transaction costs incurred in the previous year, and so on.

Information on transaction costs, including some illustrative examples of the effect they have on investment returns, can be found at:

<http://www.atlasmastertrust.co.uk/library/documents> by selecting your employer.

There are nine fund series. To identify which one is relevant for you, the section name is included alongside the relevant fund series. Members can alternatively request paper copies of this costs and charges information.

Each of the investment managers we have appointed has been able to provide the transaction cost data we require in the format we require it in, which satisfies the relevant legislation. We will continue to monitor this situation and would consider removing and replacing any manager that could no longer comply with this requirement.

Members can also ask us for the International Securities Identification Number (ISIN) of the fund or funds in which they invest. This is a unique reference number for each of the pooled investment funds available to members which will enable them to obtain more detailed information about these funds, including their objectives and performance.

You can get this information by contacting the Atlas Administration team on 0345 121 3389 or by email at memberenquiries@atlasmastertrust.co.uk. Alternatively, you can write to them at PO Box 555, Stead House, Darlington, DL1 9YT.

Charges for all our Default Funds fall within the maximum statutory charge cap of 0.75%.

The charges applicable to all the investment options that members can choose from can also be found in the Investment Guide for their section.

Fair charges are an integral part of our annual assessment of Value for Members. There is more on this in the section headed **Transaction Costs** in our Value for Members assessment at Appendix 1).

Reviewing our service providers

We review our service providers regularly. In the case of our three core service providers (Capita, Schroders and Scottish Widows), we review key data at least quarterly. Other service providers (for example, Legal advisers and auditors) are formally reviewed on an annual basis.

The Service Level Agreements we have in place with Capita Pension Solutions help to ensure that core processes and benefit payments are accurate and timely. We review interactions that our operations team has with members – complaints in particular – to see how we can improve the member experience. We have given our Discretions and Appeals Sub Committee a specific

Governance Statement

Reviewing our service providers (continued)

remit to undertake root cause analysis of complaints to identify any common issues at the heart of member dissatisfaction. We regularly review the performance of our selected investments, to ensure they are performing in accordance with the objectives we have set, and to act as an early warning system if things are not going as expected. We do this with the support of, and advice from, our investment adviser (Capita Pension Solutions), and with regular reports from Scottish Widows, which are reviewed by both our Investment Sub Committee and the Trustee Board.

Trustee Knowledge and Understanding

Each Trustee Director is required to demonstrate that he or she meets The Pensions Regulator's Trustee Knowledge and Understanding requirements. Each Trustee Director is accredited as a Professional Trustee, as defined by The Pensions Regulator, and therefore subject to higher professional standards. The Fitness and Propriety of our Trustee Board was assessed by The Pensions Regulator as part of the Master Trust authorisation process and we are required to provide ongoing assessments to them as part of their Master Trust supervisory regime.

We have a Fitness and Propriety Policy which we review annually, in conjunction with an annual review of the Board's effectiveness (last undertaken in March 2021) where, through a process of self-evaluation and with input from others, we seek to identify any gaps in our skills and knowledge, and develop plans to remedy any deficiencies. We also review the effectiveness of:

- Atlas' Scheme Strategists (the people primarily responsible for developing and delivering Atlas' financial Business Plan);
- Atlas' Executive team (the employees responsible for the day to day management of Atlas); and
- The Four Sub Committees that support the Trustee Board.

To help our effectiveness evaluation, we utilise skills questionnaires modelled on guidance from The Pensions Regulator. We then apply a peer review process. On a more regular basis, we use each quarterly Board meeting to determine whether we, as a Trustee body, with support from our Executive team and various advisers, have sufficient skills and knowledge to undertake each of the activities scheduled in our Annual Planner in the coming months. We repeat that process at the quarterly meetings for our Engagement, Risk & Operations and Investment Sub Committees. We can therefore address any skill or resource shortage ahead of the planned activity.

Our evaluation is at both the individual and collective (Sub Committee and Board) level. That is, we review the skills and knowledge of each Trustee Director, non-Trustee Sub Committee members (and, separately, each Strategist) and we then apply that to an evaluation of the Sub Committee's and Board's collective skills and competence using our Annual Planner as a reference.

On an annual basis we evaluate the Sub Committee and Board effectiveness by reflecting on the events over the year and how well we dealt with them.

Governance Statement

Trustee Knowledge and Understanding (continued)

Accountabilities, Knowledge and Understanding, Scheme-Specific Knowledge, Skills and Experience. We retain a matrix of the skills we require as a Board and we review that matrix on an annual basis to see whether or not the changing environment requires us to enhance the Board with new skill sets which we can achieve either by training or by new appointments. The matrix comprises over 60 questions based around our behaviours,

We also have a Fitness and Propriety Policy. This requires that each Trustee Director must meet the following standards, both immediately prior to appointment and while holding office:

- We must demonstrate that we are familiar with Atlas' Trust Deed and Rules and understand the roles, responsibilities and powers of the parties thereto. All relevant documents, including the Trust Deed and Rules, are available to us 24/7 through an online filing system, thereby supporting a working knowledge of these documents. We are also familiar with all other key documents, including the Statement of Investment Principles and our various policies (see below).
- We understand the basis of the service contracts with each of Atlas' service providers and the key responsibilities and accountabilities of each of those providers. These are also available to us 24/7 through the online filing system referenced above.
- We have a number of policies in place, including policies on Investment Beliefs, Value for Members, Conflicts and Fitness and Propriety. We review these policies annually, in accordance with our Annual Planner.
- We must possess appropriate experience, educational or professional qualifications, including being accredited as a professional trustee by a recognised body.
- We must demonstrate a high degree of knowledge about Defined Contribution pension provision in the UK including, but not limited to, law and regulation, funding and investments, communication methodology, scheme design and scheme administration. Our legal adviser provides updates prior to Trustee meetings (supporting and enhancing our working knowledge of the law relating to pensions and trusts, and helping identify ongoing developments that we should be aware of).
- We must demonstrate experience of managing a variety of pension service providers, including monitoring and assessing their performance.
- We must demonstrate independence, integrity and authority, sufficient to challenge service providers and/or scheme founders or participating employers if and when necessary.
- We must evidence a high degree of competency in our concurrent and previous roles.
- We must demonstrate at all times integrity, honesty and sound ethical character.
- We must not have been reprimanded, disqualified or removed by a professional or regulatory body in relation to questions of honesty, integrity or business conduct.
- We must understand and be capable of enforcing a strict compliance, risk awareness and good governance environment.
- We must not have been involved in the management of a company that has failed as a result of deficiencies in the execution of their role in the management of that company during their tenure.
- We must not have been the subject of civil or criminal proceedings in relation to the management of a company.

Governance Statement

Trustee Knowledge and Understanding (continued)

- We must not currently be, or have been in the past, the subject of a serious criminal conviction.

Our Business Plan anticipates that we will expand the Trustee Board as Atlas grows in size. When these new appointments are made, the incumbent(s) will be subject to the same Fitness and Propriety policy as noted above. Any training needs will be identified during the appointment process and a formal training plan will be drawn up and implemented within a timeframe approved by the Trustee Chair. Induction training will be provided within the first month of appointment to include familiarisation with the Trust Deed and Rules, the Statement of Investment Policy, all other Trustee Policies and Beliefs and familiarity with each of the service providers and the metrics by which we monitor and review them. A key requirement will be that each new Trustee Director will be required to obtain The Pensions Regulator's Trustee Toolkit certificate (or equivalent) within six months of appointment, assuming that they do not already hold it. In the case of a professional trustee, they will be required to be accredited as a professional trustee by an accredited body.

As noted above, our Annual Planner also requires us to 'forward plan' for activities that are scheduled to be undertaken over the following quarter in particular, but also over the year ahead, to ensure we have the right balance of skills and knowledge to carry out those activities. If not, we will have time to make contingency plans – such as additional training or recruitment. We receive regular updates on the law and regulation that impact defined contribution pension schemes like Atlas. We regularly engage with The Pensions Regulator and Department for Work and Pensions on policy matters, and to help influence better outcomes for members. We do this directly and through the Atlas Executive.

Each of us Trustee Directors is defined as a Professional Trustee. Two of us, Steve Delo and Penny Green, are representatives of Independent Trustee companies (PAN Trustees UK LLP and BESTrustees Limited respectively) which are subject to stringent Training and Competence obligations. PAN Trustees UK LLP is part of the PAN Group, which operates extensive control processes for its business, which include an Assurance Framework Supplement as specified by The Pensions Regulator. This applies formally to PAN Trustees Limited (of which Steve Delo is a director) and the control procedures for which are informally adopted by PAN Trustees UK LLP. Strict fitness and properness and professional development criteria applies to all members of PAN Governance LLP. BESTrustees Limited operates extensive control processes for its business, similar to PAN's. This includes an Assurance Framework, strict fitness and properness criteria and Continuous Personal Development (CPD) programmes.

As Chair I am a Fellow of the Institute and Faculty of Actuaries and subject to its Professional Code of Conduct regime. Each of us Trustee Directors is a Fellow of the Pensions Management Institute, and subject to its Professional Code of Conduct regime.

All of the Trustees are also accredited as professional trustees by a recognised body and are subject to meeting annual Continuing Professional Development (CPD) requirements.

The Trustee also employs professional advisers (Capita Pension Solutions, Pinsent Masons, Scottish Widows and Crowe UK) to provide advice and support services to ensure that scheme governance, controls, skills and technical knowledge remain up to date sufficient to meet or exceed the expectations of regulators, employer clients and our scheme members. We can commission additional advice or other services from other professional advisers as we see fit – we are not limited to those from within Capita Group or its own panel of service providers. We see this as critical to our independence.

Governance Statement

Trustee Knowledge and Understanding (continued)

Atlas is accredited with the Master Trust Audit Assurance Framework. This is an independent audit of Atlas' control environment which includes an audit of our controls around Trustee Fitness and Propriety. The latest report is available on line at;

<http://www.atlasmastertrust.co.uk/library/documents>

Development Days

We usually set aside two days each year for Development Days. These are days where our Business as Usual activities, as set out in our Annual Planner, take a back seat. Instead we look at a wider range of topics currently affecting Defined Contribution pension schemes like Atlas, or things on the horizon that may come into play. We invite guests along from the wider pension industry to give their views (and to challenge ours) or specialists in other important areas, such as cyber security.

As a result of the Covid-19 pandemic we were unable to hold formal development days during the year, as these are best held in a face-to-face environment. However, the Trustee continued their development as part of their normal Trustee meetings, as outlined above.

Summary

The combined knowledge and understanding of the Trustee and its advisers enabled the Trustee to properly run the Trust, in the year, as follows:

- Trustee Directors are able to challenge and question advisers, committees and other delegates effectively.
- Trustee decisions are made in accordance with the Trust's rules and in line with trust law duties.
- Trustee Directors' decisions are not compromised by such things as conflicts.

Considering actions taken individually as individual Trustee Directors and collectively as a Trustee Board, and the professional advice available, I am confident that the combined knowledge and understanding of the Trustee Directors enables us to properly exercise our functions as the Trustee of Atlas.

Signed for and on behalf of the Trustee of the Trust by Alan Whalley in my capacity as Chair of the Trustee.



.....

Alan Whalley
Chair of the Trustee

Date: 30 September 2021

Governance Statement

Appendix 1: Value for Members Assessment

Introduction

Welcome to our annual assessment of the value that Atlas members receive for the charges they pay and transaction costs attributable to their accounts. 'Value for Members' analysis and reports such as this are a legal obligation for trustees for two reasons. Firstly, so that we can continually challenge ourselves to ensure that we are delivering good value. Secondly and more importantly, so that members and the employers that they work for can understand Atlas value proposition.

Our main role within Atlas is to oversee the smooth, safe and efficient running of Atlas for the benefit of all of our members and all of the employers who have chosen Atlas as their pensions provider. Ensuring Value for Members, or VFM for short, is one of our most important objectives.

The policy that we have developed to help us assess VFM is based on two central tenets:

- 1. lowest cost isn't synonymous with the best value; cheap isn't always cheerful; and**
- 2. it isn't always true that you get what you pay for – you can pay too much for not enough.**

As in previous years, these beliefs continue to inform our evaluation of Atlas' VFM. There are many costs associated with running pension schemes, some predictable and some not. If charges are too low there is insufficient room for improvement and development, both of which are essential given the long-term nature of pensions. (Many of our members today may still be members in 50 or more years.) Conversely, charging disproportionately more than the actual costs experienced can never be in members' interests. Navigating the fine line between charging too little and charging too much is critical to our VFM assessment.

Regulatory expectation

The Pensions Regulator (TPR) – the public body responsible for regulating workplace pensions in the UK - requires trustees to take account of four main attributes in their assessment of VFM.

These are:

- Scheme management and governance;
- Administration;
- Investment governance; and
- Communications

Our assessment takes each of these aspects of scheme management into account.

Our VFM Assessment

In making our assessment of whether Atlas levies charges that are fair and reasonable in light of the governance, administration, technological and communications services we deliver, we have considered whether Atlas offers or provides for:

- A good level of services, flexibility and choices to members;
- A governance environment in which good decision-making can thrive;

Governance Statement

Our VFM Assessment (continued)

- An effective, efficient network of service providers and sub-committees (and others) that support both the trustees' day to day and their strategic work;
- Communications that can inform, engage and educate members, and which can give them the confidence to make choices that suit their circumstances, as and when they want to;
- Investment strategies that are designed for appropriate outcomes in an array of different circumstances.
- Robust, accurate, efficient administration platforms;

In assessing the value of the services that Atlas offers members, and the flexibility and choice within that offering, we took into account:

- The flexibility that Atlas members have to increase or reduce their contributions;
- The number of different ways that members are able to contact Capita (Atlas' Administrator) in order to make changes and enquiries or to access information, and the efficiency of those options. While it is our aim for Atlas to be digital first (i.e. an on-line experience), it is not exclusively so and members are able to write in, e-mail or call the UK based member helpline which is staffed by dedicated, pension-literate service operatives who will link directly to the Atlas administration team if they are unable to resolve the query. We continue to trial WhatsApp technology as an alternative way to link members to our helpdesk. We measure how quickly members' queries are resolved and regularly review performance metrics such as how quickly a call is answered and how quickly the query is resolved;
- Very importantly, members do not need to transfer their benefits to another pension provider or to buy another pension product in order to access their pension savings. Instead they can take income and/or cash sums direct from Atlas for no additional charge. They can do this, irrespective of the size of their pension pot, over the short, medium and long term – whether retired or still in work – maximising flexibility and allowing them time and opportunity to manage their retirement income in the most appropriate way. We know from our research that this is a feature shared by few other Master Trusts, and it is a feature that we hope will give confidence to members to transfer-in to Atlas other pension pots from schemes that do not offer the same flexibility;
- The number, quality and suitability of investment choices available to members during both accumulation (the savings stage) and decumulation (the drawing benefits stage);
- Our investment strategy and governance oversight.
- That there are no hidden charges - members pay only the charges they've been told about (see also 'Transaction costs').
- On-line member guidance, modelling tools and educational modules to help guide and support members up to and through retirement.
- In conjunction with the Atlas Executive Team, we continue to explore tools and strategic partnerships with the aim of providing additional, cost effective education, guidance, advice and support to members to help them make appropriate savings and retirement decisions. For example, we have a contribution calculator and budget planner on the website, as well as well as other planners available through the member portal.

Governance Statement

A governance environment in which good decision-making can thrive

In assessing the quality of our governance environment over this period, we considered:

- The knowledge and competence of our Board, its Sub-Committees, the Scheme Strategists (the people primarily responsible for Atlas' Commercial direction) and the Atlas Executive (the Capita employees responsible for Atlas' day to day operation). We review this structure formally on an annual basis which gives us the opportunity to identify if there is room for improvement;
- The availability and quality of other governance, technical and legal experts that we are able to call upon;
- The sufficiency, timeliness and accuracy of scheme performance data and other information available to us to:
 - help us ensure that members' contributions are invested correctly and quickly,
 - ensure that members receive the correct benefits,
 - gain adequate oversight and control to ensure that our various strategies are being delivered, and
 - to highlight any areas of concern that we need to focus attention on.

As part of our regular Trustee Board and Sub-Committee meetings we undertake a series of formal annual assessments. These include a review of our own competence and efficiency as a Trustee Board, a review of our Strategists and Sub-Committees – both structures and efficiency - and a review of the collective knowledge and competency of the Atlas Executive. We also assess how well our service providers delivered against the performance benchmarks we have set them including:

- the sufficiency and timeliness of legal and other professional advice and support on regulatory and legislative change programmes,
- economic data;
- behavioural data; and
- technology improvements and best practice developments.

We also consider how well - and how often - we listen to others' voices and opinions. 'Others' includes members, participating employers, prospective employers, external consultants, trade bodies and the regulatory community. In making this assessment we consider the make-up of our Engagement Sub-Committee (which includes two trustees), and wider Capita expertise, and the feedback we get from our Member Forum.

We review all feedback from independent evaluators, consultants and other third parties during open tender processes for potential new participating employers and through our ongoing engagement with them. We have regular dialogue with the regulatory community

- in particular through the supervisory regime that all authorised Master Trusts are subject to. We are required to provide key information to The Pensions Regulator on a regular basis, and have regular, scheduled meetings with them.

Throughout the Covid-19 pandemic our governance structure has allowed for the uninterrupted operation and oversight of Atlas and, in particular, our effective decision making processes have operated extremely well, even in a virtual environment.

Governance Statement

An effective, efficient network of service providers, sub-committees and others that support our day to day and strategic work.

With the exception of the Discretions and Appeals Sub-Committee, which meets on an ad-hoc basis, each of our Sub-Committees meets at least quarterly and provides valuable Trustee support. Our Engagement Sub-Committee, Risk and Operations Sub-Committee and Discretions and Appeals Sub-Committee are chaired by a Trustee Director to give us first-hand oversight and leadership. Our Investment Sub-Committee is chaired by Paul Trickett, an independent, highly qualified, investment professional. We undertake annual reviews of the competence, membership and efficiency of each of our Sub-Committees.

Our Client and Member Forums are up and running. Our Client Forum is a forum for participating employers to meet and discuss development plans and to air any issues they or their employees are experiencing. Unfortunately, due to the Covid-19 pandemic, we were unable to hold a formal employer forum during the period, but plan to recommence these as soon as it's practical and safe to do so. We continue to receive employer feedback via the Atlas Executive and employers are also aware that they can contact the Trustee directly. Our Member Forum is intended to give members a voice in how we work, helping us to identify what we do well and what we can do better. This is predominantly an on-line community to which new members are always very welcome. Members who may be interested in joining this group and helping us to shape Atlas' future should contact Richard Solomon – Richard.solomon@atlasmastertrust.co.uk.

Communications that can inform, engage and educate members

We continue to develop our engagement strategy; we have a long-term vision of a highly digitalised future where members can engage with their Atlas retirement savings through the medium that best suits them, such as on-line and through Apps. We are, however, committed to retaining more conventional channels (such as post and telephone) for members who prefer to engage in that way.

We publish regular Trustee Newsletters which cover contemporary issues and matters of general interest.

We used our new style Benefit Statements for the first time in 2020. We call these Annual Updates, which we think better suits the type of information we include. We adopted the principles of a recent industry and regulatory initiative to simplify the structure of our annual updates. Member feedback on this new style was positive and the inclusion of four personas to outline the impact of the Covid-19 pandemic, resonated particularly well.

Our member engagement strategy focusses on an online journey including using downloadable video and audio content so that members can learn more about pensions and related topics 'on the go' and at a time of their choosing.

We launched our new website and have transitioned members to a new member portal which is linked directly to the underlying administration system. We are also in the process of updating the member booklet, investment and retirement guides to make them even more helpful. Our Engagement Sub-Committee continues to focus on;

- Feedback generally (including feedback from participating employers and members, in particular through our client and member forums and from members after any specific interactions with Atlas;

Governance Statement

Communications that can inform, engage and educate members (continued)

- Input from 'Sparks', Capita's dedicated member-engagement specialist team;
- Specific feedback from participants in respect of 'outcome critical communications' including Trustee Newsletters, new member on-boarding communications, accumulation and decumulation investment nudges, retirement wake-up packs and ongoing retirement support;
- Our communication methodologies and technologies;
- Members' responses to specific and/or targeted communications/messaging;
- Members' responses to different media;
- Feedback from independent evaluators and consultants.

Investment strategies designed for good outcomes in an array of different circumstances

In assessing the quality of our investment decisions, we take into account:

- The quality of Scottish Widows' (see below) investment platform proposition including;
 - platform costs;
 - open architecture capabilities;
 - transition management capabilities;
 - our (and their) ability to negotiate better or 'favoured nation' terms;
 - the security of assets on the platform;
 - error remediation process;
 - ability to provide data – including transaction cost data - accurately and in a timely manner
 - operational effectiveness and efficiency;
 - The cyber-attack prevention capabilities and Business Continuity and Recovery processes; and
 - Environmental, Social and Corporate Governance (ESG) policies.
- The competence and effectiveness of our Investment Sub Committee;
- The skills, judgement and competence of our Investment Consultants, and the flexibility that we as trustees have to use different investment advisers depending on the nature and complexity of the task in hand;
- The capabilities of our primary investment partner (Schroders) and the fees we pay for the three Multi Asset Portfolio funds we have with them;
- The performance, suitability and effectiveness of our default strategies;
- The range and value of our self-select fund range;
- Whether any investment-related conflicts exist that might impede good member outcomes.
- The research capabilities and analytical methodology employed by our Investment Consultants to help inform our investment strategy;
- The ability of our Investment Managers to identify Transaction costs and their willingness to engage with the regulatory requirements for standardised measurement and disclosure of these costs;
- The reasonableness (or otherwise) of those Transaction Costs (see below).

Governance Statement

Transaction Costs

Transaction costs play a vital role in the investment returns that members receive. These are the costs incurred by investment managers in pursuit of their investment objectives. They include activities such as buying and selling stocks, taxes payable on stock purchases, commissions to third parties and costs of third-party investment research. Different investment managers and funds have different investment objectives, and therefore transaction costs can and do differ significantly – not just between different investment funds but also within the same fund over a period of time. That is, transaction costs in any particular investment fund in any year may be more or less than the transaction costs incurred in the previous year, and so on.

All pension schemes like Atlas are required by law to provide more information about charges and transaction costs to their members. We have created a section within the website library specifically for this purpose to which members can refer whenever they wish <http://www.atlasmastertrust.co.uk/library/documents> by selecting on their employer. There are nine fund series. The relevant fund series has been included in the specific employer section within the library. Understanding the magnitude and effect of charges and transaction costs is also very important to us as trustees. It helps us evaluate whether the fund managers we appoint are efficient and whether the funds we make available to Atlas members represent good value. It doesn't automatically follow that the lowest transaction costs represent the best value. Some investment funds (like our Multi Asset Portfolio funds managed by Schroders) are expected to incur relatively high transaction costs because we expect Schroders to be actively managing the portfolios in accordance with the mandate we gave them. Other fund managers - especially those who are managing a passive mandate (i.e. one that tracks a specified investment index) – will typically undertake less activity and can therefore be expected to incur lower transaction costs. Our responsibility is primarily to evaluate whether managers are efficient or inefficient, and whether the costs of their activity add to or subtract from investment returns.

For our passive investment manager line-up, we compare the transaction costs of our primary manager (LGIM) against a cross sample of other, similar passive fund managers to ensure that LGIM's transaction costs are comparable with the peer group.

Robust, accurate, efficient administration platforms

As we have noted in each of our Value for Money reports, good administration is a pre-requisite for a well-run Master Trust and an area of the utmost importance to us. Our administration service provider is Capita Pension Solutions (CPS), whose performance we monitor regularly through our own dedicated Head of Operations and more formally on a quarterly basis at each of our scheduled Risk & Operations Sub-Committee and Trustee Board meetings. We review performance more frequently during peaks of activity, such as when on-boarding new schemes or accepting bulk transfers. We may also monitor performance more frequently if there has been any deterioration in performance. Our Risk & Operations Sub-Committee supports us with the monitoring and oversight process. Our Head of Operations acts as the day to day interface with the Atlas administration team within Capita. Our assessment took into account:

- Process timing;
- Regular monitoring of administration services against Service Level Agreement;
- The sufficiency and quality of the Management Information that is included in our Administration reports;

Governance Statement

Robust, accurate, efficient administration platforms (continued)

- Any qualitative assessments of the administration service from members, including complaints and compliments and responses to surveys and questionnaires;
- Security procedures, including against cybersecurity, fraud and scam risks;
- Data integrity and compliance with data protection legislation;
- Business Continuity Plans that ensure business-critical activities can continue to function in the event of disruption (such as a fire at a particular work site); this proved to be vitally important in the wake of the Covid 19 Pandemic (see below);
- Operational scalability – our ability to increase the size and scale of Atlas without undermining the quality of service delivery;
- Errors and error rectification;
- The Audit Assurance Report 01/06 prepared by Capita, which provides reasonable assurance about the controls within their business, including operational, cyber security and Business Continuity and Recovery Plans;
- Helpdesk performance measurements (both qualitative and quantitative).

As in previous years we can report that the agreed timeframe for undertaking each operational activity has been met consistently, which, when considered against the backdrop of the Covid-19 pandemic, is particularly pleasing.

We are delighted that over this reporting period good work has been maintained and – in some instances – even improved upon. The Covid-19 pandemic has created some significant logistical challenges for most, if not all, businesses. We are delighted with the way Capita has responded to these challenges, seamlessly implementing (and adapting where necessary) their Business Continuity & Recovery plan. Homeworking was introduced with impressive speed and efficiency, while the on-line capacity to enable system access was improved significantly. Remote working included those staff involved in telephony services, traditionally a call-centre type operation. This allowed the Atlas Help Desk to remain open and effective throughout a period of peak demand from understandably concerned members, with only a small but – in the circumstances – acceptable drop in pick-up times (the time taken to answer calls). We know that many pension providers have not fared so well during this crisis and have had to both scale back and reprioritise many operational functions.

Some of the additional initiatives introduced during the reporting period are:

- The implementation of Origo, an automated industry wide transfer system that enhances the process efficiency for members making transfers in and out of Atlas.
- A trial using WhatsApp technology to connect with members via a new channel.

We both expect and believe that these initiatives will have a very positive impact on the Atlas member experience.

Governance Statement

Charges that are fair and reasonable

Atlas operates a 'bundled' pricing model, whereby a charge is levied against members' accumulated funds for the provision of all services – Governance, Administration, Investment and member engagement. We apply a single charge (called a Total Expense Ratio – or TER) which varies according to the investments selected by members and can vary depending on the size of the organisation for whom they work. (The economy of scale gained through administering larger workforces usually means a lower administration charge for those organisations.)

Over the course of this year, Atlas has continued to participate in competitive tender processes. These are processes whereby potential clients (or their advisers) ask Master Trusts to tender for their business. This includes detailing the charges that we would apply should we be successful. The feedback we receive from these exercises confirms to our satisfaction that our charges are indeed competitive relative to other Master Trusts, and this knowledge gives us a great deal of confidence about our VFM assessment.

In addition to this valuable feedback our VFM review considered:

The competitiveness of our TER (during both the saving and spending cycles) compared to our peer group. Our proposition for members in the drawing benefits cycle (taking one off cash payments and/or regular income from their accumulated savings) is something we are especially proud of since we do not levy a higher charge (unlike many of our competitors) nor we do not impose a minimum pot-size in order to do so (again, unlike many of our competitors).

Charges for specific transactions, including transfer penalties, investment switch charges, drawdown charges and UFPLS charges (none of which are charged by Atlas but which are charged by some other Master Trusts).

Benchmarking exercises – both independent exercises conducted by unconnected parties and those that we have commissioned to help us assess ourselves against competitors.

Conclusion

To help us reach our conclusion we asked ourselves two questions.

1. Does the scope and quality of each service provide good value for the relevant costs and charges incurred by members?
2. Does the scope and/or quality of a particular service justify any differences in cost when compared to similar schemes and other options available in the market?'

In respect of the first question, we consider that the foregoing analysis demonstrates that Atlas does indeed provide comprehensive services that represents good value for the relevant costs and charges incurred by members.

In respect of the second question, we are confident in our conclusion that all of Atlas' services compare well to other schemes in the market during both the savings (accumulation) phase and (especially) during the drawing benefits (decumulation) phase. As noted above, we can be confident about this from the fact that we do not levy transactional charges for different services, and from feedback (from intermediaries, trustees and employers) that we receive from tender exercises, which confirm that Atlas is indeed competitive relative to similar offerings available in the Master Trust market.

Governance Statement

Conclusion (continued)

As, we did in last years, report, each of us trustees undertook a 'blind-score' approach in order to give a numerical base to this assessment. Our ratings for each of the above criteria were out of ten. We then took the average of these scores (rounded to the nearest 0.1) to give us a single rating. We intend to use this rating to measure our progress in maintaining - and hopefully improving - the value Atlas offers over time. We have also selected some of our comments to help explain the rationale behind our scoring.

	2019/20	2020/21
A good level of services, flexibility and choices to members <i>'I think we have a genuinely flexible solution that works and can be understood by members, without being overly engineered with features that are unlikely to be used or relevant to the audience.'</i>	7.7	7.7
A governance environment in which good decision-making can thrive <i>'Very effective governance framework supported by an executive team with all relevant skills and experience.'</i>	9.3	9.0
An effective, efficient network of service providers and sub-committees <i>'Strong line up all round.'</i>	8.7	7.7
Communications that can inform, engage and educate members <i>'More work to do but good progress over last year with updated materials and digital first'.</i>	7	8.0
Investment strategies that are designed for appropriate outcomes in an array of different circumstances <i>'I believe the investment strategy remains robust and fit for purpose. Our investment governance has been strong and well structured'.</i>	7.3	8.0
Robust, accurate, efficient administration platforms <i>'Outstanding response through pandemic and shift to home working.'</i>	8	8
Charges that are fair and reasonable in light of the above <i>'VFM is already evident. More scale would allow further enhancement of proposition and/or reduced charges'.</i>	7.7	8.0
Overall Rating	8	8

In conclusion, we are confident that Atlas continues to levy charges that are fair and reasonable in light of the governance, administration, technological and communications services we deliver.

We will of course continue to identify and champion product enhancements and improvements in value that will ultimately enhance member retirement outcomes.



Alan Whalley

Chair of the Trustee

Date: 30 September 2021

Governance Statement

Appendix 2: Statement of Investment Principles – September 2021

Introduction

The Trustee of the Atlas Master Trust (the “Plan”) has drawn up this Statement of Investment Principles (the “Statement”) to describe how the Trustee invests the assets of the Plan. The Statement has been prepared in accordance with the requirements of the Pensions Act 1995, the Pensions Act 2004, the Occupational Pension Scheme (Investment) Regulations 2005 and the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2018 and 2019.

In preparing this Statement we, the Trustee (‘we’) have consulted Capita Pension Solutions Limited (the “Founding Employer” and “Funder”) and received appropriate advice from the Trustee’s investment advisers.

This Statement covers Atlas’ **Primary Default Strategy**, its **Legacy Default Strategies** and its **Ancillary Default Strategy** which includes **all self-select options**. Further details are provided below.

Investment Advisers

Introduction

The Atlas Trustee comprises Independent Professional Trustees. It is supported by its Investment Sub Committee (ISC), which is chaired by a prominent independent investment expert, and by the Atlas Executive team (Executive), which comprises a dedicated team of pension professionals. The Board and ISC each meet formally on a quarterly basis with additional meetings as required. Significant activity is undertaken between meetings to ensure that any decisions or changes that need to be made are not delayed simply to coincide with planned meeting cycles. Consequently, we believe that rather than being wholly reliant on third party investment advice, we are competent – with relatively limited advisory support – to determine Atlas’ long-term investment strategy and short-term tactical activities. The composition of the Board, ISC and Executive is such that there is a vast amount of DC investment experience and expertise within Atlas, including experience of other Master Trusts. Scheduled annual evaluations of competence and effectiveness for the Trustee, ISC and Executive (the results of which feed directly into our ongoing assessment of Fit and Proper persons for TPR returns) will identify any knowledge gaps and training needs or if greater reliance should be placed on investment advisers.

The collective competence is such that the Board considers itself capable of:

- Determining strategic asset allocation and investment strategy;
- Investment manager selection (including appointments and delegation of authority);
- Determining investments to be made or retained and understanding the Trustee’s powers in this area; and
- Determining matters involved in the preparation or revision of the statement of investment principles (SIP).

Accordingly, rather than relying on ongoing investment advice from one or more investment advisers, Atlas commissions work from investment advisers to satisfy legislative and regulatory requirements (such as regulated s36 advice) and for specific purposes or for one-off projects.

Governance Statement

Introduction (continued)

The two FCA regulated advisory firms currently used by Atlas are:

- Capita Pension Solutions Limited.
- Hymans Robertson LLP

The principal roles and responsibilities of each of those advisers, and the basis upon which we evaluate them, are described below.

Capita Pension Solutions Limited (Capita)

Capita are commissioned to provide:

- Quarterly 'exceptions reports' to the ISC/Trustee Board highlighting any anomalous investment performance relative to benchmark, including a brief narrative. The ISC/Trustee may then commission a deeper investigation;
- SMPI recommendations;
- Collating information on transaction costs in respect of the Atlas investment funds and of other managers (for comparison purposes);
- Collating data in respect of stock lending activity in the core funds (defined as funds in excess of £10m) which undertake stock lending activity Ad-hoc work including risk categorisations and research into managers and funds.

We acknowledge that Capita does not research or advise on the whole investment market and that there are, therefore, limitations to the scope of work that Capita can undertake.

Performance evaluation

As with all service providers, Capita is formally reviewed on an annual basis in accordance with the Trustee's Governance Schedule. The review is undertaken by both the ISC and Trustee Board. It takes account of the timeliness, clarity and effectiveness of the scheduled work (the exceptions reports and SMPI) and the ad-hoc work undertaken.

Objective	Success Criteria
Quarterly 'exceptions reports' to the ISC/Trustee Board highlighting any anomalous investment performance relative to benchmark	SLA of 10 working days from the production of the quarterly investment report from the Scheme's platform provider (see below). 100% of funds to be reviewed.
SMPI recommendations	SLA of 8 weeks of a formal request from the Atlas Trustee Board or ISC or agent thereof and to include 100% of the funds available to members.

Governance Statement

Performance evaluation (continued)

Objective	Success Criteria
Transaction Cost reports (including portfolio turnover)	Annual report comparing transaction costs of our core funds (defined as funds with assets in excess of £10m) against what would be expected from such funds by 31 st July each year.
Collating and reporting data on stock lending activity for core funds (see definition above).	By 31 st July each year.

Specific objectives and success criteria for ad-hoc work will be agreed by the Trustee Board and/or ISC and confirmed to CPSL in advance.

Hymans Robertson LLP

Hymans Robertson LLP is commissioned to provide ad-hoc advice on more complex investment matters. Examples include advice on the default strategy and on specific investment managers and funds that are not routinely researched by CPSL. Decisions about when to commission Hymans Robertson to provide advice is taken by both the Trustee Board and the ISC. Specific objectives and success criteria will therefore be agreed by the Trustee and confirmed to Hymans Robertson in advance.

Performance and objectives evaluation

As with all service providers, Hymans Robertson is formally reviewed on an annual basis in accordance with the Trustee's Governance Schedule. The review is undertaken by both the ISC and Trustee Board. It takes account of:

- the timeliness, clarity and effectiveness of the ad-hoc work undertaken;
- whether the objectives set for them by the Trustee/ISC are appropriate for that work;
- whether they continue to satisfy the requirements set out below under Open Tender Process;
- the ability to support the Trustee's policy and objectives in relation to climate change.

Actions for the Trustee

The Trustee is developing its policy and assigning roles and responsibilities for the following:

- Ongoing reporting of information on managers' corporate engagement activities (including the most significant votes cast on the Scheme's behalf and what proxy voting services have been used) and will then be reporting annually on this; and

Ongoing reporting of information on managers' corporate engagement activities (including the most significant votes cast on the Scheme's behalf and what proxy voting services have been used) and will then be reporting annually on this.

Open Tender Process

Open tender appointment processes will take into account the following:

- The principles of Value for Members, irrespective of whether the fee is ultimately paid through charges borne by members;

Governance Statement

Open Tender Process (continued)

- Whether any adviser is a commercial competitor (i.e. operates its own Master Trust) and, if so, the extent to which its Information Barrier processes satisfy us and the Funder that conflict management satisfactorily protects Atlas' Intellectual Property and commercial position;
- The adviser's independence, regulatory standing, financial strength, professional credentials and technical competence.
- The organisation's own ESG credentials (including but not limited to any activism undertaken) and the level of ESG research undertaken in their manager review and selection processes,
- The extent to which the adviser may be conflicted by commercial ties to other Master Trusts.
- To protect its commercial position, we will consider any relevant input from the Funder during the appointment process.

Governance

We make all major strategic decisions including, but not limited to, the design of the investment structure and individual strategies, the range of asset classes and risk levels made available and the appointment and termination of investment managers. The process for making investment decisions is as follows:

- Identify appropriate investment objectives.
- Agree the level of risk consistent with meeting the objectives.
- Implement an investment strategy and investment manager structure in line with the level of risk and objectives agreed.
- Monitor the performance of the investments and take appropriate steps to address any areas for improvement.

When making such decisions, and when appropriate, we take proper advice. Our investment advisers, Capita and Hymans Robertson, are qualified by their ability in, and practical experience of, financial matters and have the appropriate knowledge and experience to provide such advice.

Investment objectives

We recognise that our ultimate objective is to help to ensure that Atlas' members are able to retire on a reasonable level of pension taking into account the contributions paid into their individual accounts and the timescale over which those contributions were invested.

We recognise that individual members have different investment needs and that these may change during the course of their working lives. We also recognise that members have different attitudes to risk.

We believe that members should be encouraged to make their own investment decisions based on their individual circumstances. Therefore, we have made available a range of investment options that we believe should enable members to maximise pension pay outs in real terms consistent with the level of risk chosen by them, according to their belief sets.

We regard our duty as making available a range of investment options sufficient to enable members to tailor their investment strategy to their own needs.

Governance Statement

Investment objectives (continued)

We also recognise that members may not believe themselves qualified to take investment decisions. As such, we make available a range of lifestyle strategies, one of which – the Higher Equity Drawdown Strategy – is designated as our '**Primary Default**' investment strategy. We use the term 'Primary Default' to distinguish it from other funds and strategies that are default funds either as a consequence of a legacy arrangement ('**Legacy Defaults**') or as a consequence of falling within the legal definition of default funds rather than through a deliberate strategy or policy of the Trustee ('**Ancillary Defaults**'). We review all Default Strategies annually, in accordance with our Annual Planner.

Our lifestyle Choice Architecture also provides for a medium equity and lower equity drawdown strategy, and higher, medium and lower equity portfolios targeting cash and annuity. Using this Choice Architecture, participating employers can tailor a default to their membership demographic. Defaults which are derived from this Choice Architecture are also designated as **Primary Defaults**.

- Legacy Default Strategies are strategies which Atlas may 'inherit' when different employers join and transfer their pre-existing pension arrangements, subject to the Trustee's acceptance. They are available only to a ring-fenced membership demographic rather than the wider membership. These are also reviewed annually, in accordance with our Annual Planner.
- Ancillary Defaults are single funds which fall under the legal definition of Default Funds for one or other reason. Reasons include funds which members are believed to
- have chosen themselves but where there is no longer any physical evidence of that choice, or where a member has made a choice which can be evidenced but where we have later had to redirect contributions and/or assets into an alternative fund. Examples of situations when this may happen are if we become concerned about the stability of a particular fund, or where the fund manager stops accepting contributions, or closes a fund altogether. Even if this is no more than a temporary situation, the legal definition of Default Fund as, fundamentally, an investment not specifically selected by a member, means that the fund selected by us becomes a Default Fund – an Ancillary Default in our terminology.
- We also make available a range of pooled investment funds to meet the varying investment needs and risk tolerances of our members. This includes offering both passively and actively managed investment funds. For the sake of simplicity and consistency, Atlas treats each of these funds as an Ancillary Default, including the requirement to maintain the legislative charge cap of 0.75%. It is possible that funds that are introduced in the future, where it is not possible to maintain the legislative charge cap, will be treated as a self-select fund only rather than as an Ancillary Default.

Our key objectives for Atlas' investment strategy are therefore:

- To ensure the investment strategy is consistent with relevant legislation / regulations / Trust Deed and Rules, and best practice, and that there is sufficient flexibility to react to legislative/regulatory changes;
- To ensure the investment strategy structure and design is based on the membership profile, where it is practical to do so;

Governance Statement

Investment objectives (continued)

- To offer members a reasonable range of investment options to satisfy their risk and return combinations, and to reflect the range of retirement options members now have following the 2015 Freedom and Choice In Pensions reforms;
- To provide a range of investment options in line with the members' ability to engage at different levels;
- To be mindful of the costs borne by members as a result of investing in different asset classes and using different investment management styles;
- To use diversification between different types of assets to reduce investment risk where practical and cost effective to do so; and
- To ensure the investment strategy is capable of being communicated effectively to members such that members can take informed decisions in the context of their personal financial circumstances.

The Trustee will regularly monitor the investment strategy against these objectives.

Investment beliefs

The Trustee believes:

- Investment strategy design should be based on the membership profile;
- The range of options should take into account the varied needs of the members and achieve good member outcomes;
- The lifestyle investment strategies should take account of changing member risk appetites by varying accordingly over time;
- That climate change is a financially material risk, presenting both opportunities and risks to members' long-term outcomes;
- The investment options should take account of the differing member needs as a result of 'Freedom and Choice' in pensions;
- Investment strategy should be formed in the context of the risk as well as the expected return;
- Asset allocation is the primary driver of the performance of an investment strategy;
- Active investment management should only be encouraged when significant value is likely to be added (net of investment management cost);
- Diversification reduces risk (e.g. volatility of investment returns) over time;
- Taking investment risk is usually rewarded in the long term; and
- Good governance is in the best interests of Plan members.
- Consideration of climate risk in investments will have a positive effect on member outcomes long term
- Additional charges for investing in funds that directly mitigate the risk of climate change are acceptable if the financial performance considerations and risk reduction benefits from investing are more material.
- The Trustee should explore ways to actively capture new opportunities in the transition to a lower carbon world if they are deemed to be appropriate and feasible for the Master Trust.
- The Trustee should adopt a policy of active engagement on environmental factors, including climate change with managers, the sponsor and members recognising the limitations of investing in pooled funds.

Governance Statement

Investment beliefs (continued)

- The potential financial risk to the Trust of climate changes will evolve over time, as will the Trustee's strategy
- In choosing the Plan's investment options, it is our policy to consider:
- A full range of asset classes, including alternative asset classes;
- The suitability of different styles of investment management and the need for investment manager diversification;
- The suitability of each asset class within a defined contribution scheme; and
- The need for appropriate diversification.

Climate policy

We are supportive of the Paris Agreement to avoid dangerous Climate Change by limiting global warming to well below 2°C above pre-industrial levels and pursuing efforts to limit it to 1.5°C by 2050 and where possible before this date within the context of its fiduciary responsibilities. As a result, we:

- Prefer 'Engagement' rather than 'Exclusion' with regards to incorporating Climate Change risks into an effective fiduciary framework for both self-select funds and the default strategy.
- Expect investment managers to independently consider whether exclusion or engagement is more appropriate within their investment processes and mandates; for example Schroders currently exclude tar sands and fossil fuels from the Schroders Sustainable Multi-Asset Fund which forms part of the default lifestyle strategy;
- Encourage the further development of all asset classes and funds that are aligned to the goal of well below the 2°C target;
- Are supportive of the recommendations of the Taskforce on Climate-related Financial Disclosures;
- Support and encourage the further development of effective and consistent Climate Change risk metrics to enhance the ability of all stakeholders to assess and minimise such risks;
- do and will continue to partner with our investment managers to obtain clear and easily communicable climate related data on an annual basis in respect of the funds current holdings and their impact on climate change;
- Recognise that 'Climate Change' will be subject to much further analysis and subsequent policy changes in the coming years. We are supportive of adopting an evolving policy in order to ensure all relevant developments and opportunities are captured; and
- Welcome policy initiatives that contribute towards achieving the 1.5°C target;

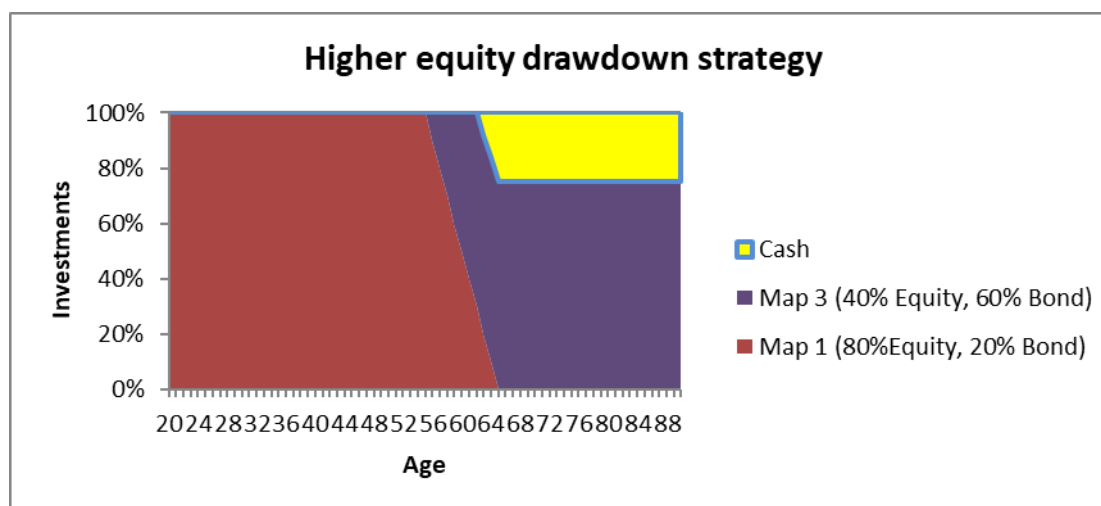
We aim to achieve a net zero emissions target by 2050 in line with the Paris Agreement's objective of achieving a rise in temperature limited to 1.5°C by 2050.

Governance Statement

Investment strategy

As a result of the above beliefs and climate policy, we follow the following principles:

We make available a range of lifestyle strategies. The overall aim of the lifestyle strategies is to deliver a level of return consistent with the level of risk taken over the members' lifetime. The strategy encompasses changing risk profile over time and then further changes in line with the way members may take their benefits. The chart below sets out the characteristics of the Primary Default investment strategy; the Higher Equity Drawdown Strategy:



- In the lead up to the members' selected retirement age, the lifestyle strategies move members' assets into a combination of lower Equity assets and cash targeting assets in line with our belief that members will use a combination of methods to draw their benefits in retirement.
- The lifestyle strategies offered will be reviewed from time-to-time by us to take into account changes in various considerations such as: the membership profile and experience; legislation and regulations; and developments in investment products.
- Legacy Default Strategies are strategies which Atlas may 'inherit' when different employers join and transfer their pre-existing pension arrangements. They are available only to a ring-fenced membership demographic rather than the wider membership. These are also reviewed annually.
- Ancillary Defaults are single funds which fall under the legal definition of Default Funds for one or other reason. These include funds which members are believed to have chosen themselves but where there is no longer any physical evidence of that choice. These tend to be funds which Atlas inherits when onboarding pre-existing assets from new employers or where contributions have had to be redirected, or assets switched, from a fund chosen by a member to one chosen by us.

Governance Statement

Investment strategy (continued)

- We also make available a range of pooled investment funds to meet the varying investment needs and risk tolerances of our members. This includes offering both passively and actively managed investment funds. For the sake of simplicity and consistency, Atlas treats each of these funds as an Ancillary Default, including the requirement to maintain the legislative charge cap of 0.75%. It is possible that any funds that are introduced in the future, where it is not possible to maintain the legislative charge cap, will be treated as a Self-Select fund rather than as an Ancillary Default.
- We keep the range of investment funds and fund managers under review and make changes as required. For example, the Trustee will consider the impact of climate related risks and opportunities and make changes, as appropriate, to improve member outcomes.

Appendix 3 provides information on all the Lifestyle investment strategies available for selection by members.

Employer-specific investment options

We have a policy for providing the flexibility for some employers to select their own investment strategy for their section of Atlas. These options must reflect the policies and principles set out within this policy and are subject to approval by us.

We require that such employers obtain appropriate investment advice and maintain an Investments Principles and Objectives Policy which is based on the legislative requirements for a Statement of Investment Principles such as this document. To the extent that the advice is extended to us in such a way as to satisfy s36 of the Pensions Act 1995, we may rely on this advice or may commission advice from an investment adviser. The employer must provide us with the relevant research and rationale behind any bespoke investment options requested.

The underlying funds used within the bespoke options must be accessible through the Scottish Widows Ltd ("Scottish Widows")'s investment platform.

Investment mandates

We have appointed Scottish Widows as provider of an investment platform through which we are able to access third party funds in order to invest Atlas' assets of the Plan. Scottish Widows is regulated by both the Financial Services Authority and Prudential Regulatory Authority.

We have selected a number of pooled funds (referred to as Ancillary Defaults or Self-Select Funds - see above) which are accessed through this platform. The fund managers selected make the day-to-day decisions about the management of the assets. The fund managers and mandates are as follows:

- Bank of Montreal (formerly F&C) Global Asset Management – Ethical fund.
- BlackRock Investment Management (UK) Ltd – Money market fund.
- Columbia Threadneedle Investments – Property fund.
- HSBC Asset Management (UK) Ltd – Shariah compliant fund.
- Lazard Asset Management Ltd – Active emerging markets equity fund.
- Legal & General Investment Management Limited – Passive, multi-asset growth and property funds.

Governance Statement

Investment mandates (continued)

- M&G Investments Ltd – Active corporate bonds fund.
- Schroder Investment Management Limited – Multi-asset growth, bond and decumulation funds.
- Nordea Asset Management and Invesco Asset Management Limited – Multi Asset Growth Fund.

Further details of the individual funds can be found in Appendix 4.

The Trustee will consider climate change policies and practices in place with the investment platform and underlying fund managers when reviewing their appropriateness in the context of the overall investment strategy.

Risk management and measurement

We are aware of, and pay close attention to, a range of risks inherent in investing Atlas' assets. These include interest rate and inflation risk, currency risk, credit risk, factor risk, benefit conversion risk, volatility/market risk, active management risk, default risk, climate risk, environmental, social and governance (ESG) risks, counterparty risk and liquidity risk. It is our view, however, that risks should also be viewed from the members' perspective and the single largest risk is that members will not achieve a reasonable income in retirement in real terms that meets their expectations. This guides our overall approach. We believe that the investment options offered to members provide adequate choice and diversification both within and across different asset classes.

- We recognise the risks that may arise from the lack of diversification of investments. Due to the size of Atlas' assets, and recognising the need to diversify, investment exposure is obtained via pooled vehicles.
- The documents governing the platform provider's appointment and pooled funds' selection include a number of guidelines which, among other things, are designed to ensure that only suitable investments are held by us.
- We recognise that the use of active management involves a risk that the assets do not achieve the expected return and potentially increases the governance requirements. However, for some asset classes (e.g. corporate bonds and multi-asset funds) we believe this risk may be outweighed by the potential gains from successful active management. Therefore, Atlas uses a mixture of index-tracking and active management which may be adjusted from time to time.
- The safe custody of Atlas' assets is delegated to professional custodians via the use of an investment platform and pooled vehicles.

Should there be a material change Atlas' circumstances, we will review whether the current investment options remain appropriate.

Governance Statement

Corporate Governance

Policy on Voting Rights and Engagement

We encourage activism but accept that by using pooled investment vehicles the day-to-day application of voting rights will in the main be carried out by the appointed investment managers and that this constrains our ability to engage directly with the investee companies. Consequently, we expect our appointed investment managers to adopt a voting policy that accords with established industry practice, as this develops over time. We will monitor and report on this with support from our Investment Advisers.

The Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019 ('the Investment Regulations') require us to set out how we undertake engagement activities in respect of our investments. This includes how we monitor and engage "relevant persons" (i.e. including (but not limited to) an issuer of debt or equity, an investment manager, another stakeholder or another holder of debt or equity) about "relevant matters" (i.e. including (but not limited to) matters concerning an issuer of debt or equity, including their performance, strategy, capital structure, management of actual or potential conflicts of interest, risks, social and environmental impact and corporate governance).

As noted above, we recognise Atlas' responsibility as a long-term institutional investor to support and encourage good corporate governance practices in the investment management companies through which we invest and through them, therefore, in the companies in which we are indirectly invested. It is our belief that such activity should not only improve the social and environmental footprints of those companies but, in accordance with our beliefs, should also protect the value of Atlas' investments for the period that they are held. However, and again as noted above, we delegate primary responsibility for corporate engagement activities to our appointed fund managers. We believe that these organisations are better structured and resourced to engage with investee companies on their performance, strategy, capital structure, management of actual or potential conflicts of interest, risks, social and environmental impact and corporate governance. We believe that in general, duplication of that engagement by us may result in a drag on our own resource and efficiency without inducing a better outcome. However, on occasions, we may deem it necessary to engage directly with companies on climate change and ESG-related issues. There may also be occasions when we identify engagement topics which overlap with the engagement efforts of our fund managers, in which case we may seek to undertake joint engagement activities with them. There may be yet further occasions when members wish for us to engage on their behalf and where so, and where appropriate, we may also seek to undertake joint engagement activity.

Our policy on ESG related activities is set out below. This includes a policy to invest, to the greatest extent possible, only through investment managers who are signatories to the United Nations Principles for Responsible Investing ('PRI' - see below).

We monitor the engagement activity of our investment managers at least annually. These reports feed into the scheduled reviews of the managers we appoint and the funds we make available to members.

Governance Statement

Non-Financial Matters

Except in the case of ESG investments (see below), we have not taken account of any non-financial matters nor have we canvassed the views of the membership in such matters. This is primarily because, in our view, the diverse nature of members in a large scheme such as Atlas means it is unlikely that we will obtain a representative mandate from them in such matters.

Environmental, Social and Governance (ESG) Investment

We believe that our primary duty is to protect the long-term financial interests of our members and that this duty can best be satisfied, in respect of the Primary Default and lifestyle strategies in particular, by adopting a focused, structured and rigorous approach to investing sustainably. We have a strong conviction that ESG issues, such as climate change and human rights can and do affect the performance of investment portfolios over the long-term and that this effect will accelerate in the future as corporate behaviours and environmental footprints are measured more critically. Consequently, ESG factors must therefore be considered alongside more traditional financial factors if we are to properly satisfy our fiduciary duty.

In accordance with this belief, we have directed Schroders, our investment partner responsible for managing the funds which are used in Atlas' Primary Default strategy to redirect the equity component of Atlas' assets managed by them into two funds which have ESG at the heart of the investment process. These are:

1. The Schroders Sustainable Multi Factor Equity (SMFE) Fund. This is a global equity strategy that integrates ESG analysis into a systematic investment approach.
2. The Schroders Global Sustainable Growth Fund (SGSG). This fund provides balance to SMFE and also has a strong ESG focus embedded in the investment process, focusing on high quality companies while also assessing their long-term approach to managing ESG risks.

The target for Atlas Multi Asset Portfolio 1 (which is the fund used in the accumulation phase of our Primary Default Fund) is for 60% of the equity content to be invested in these two funds with an approximate split of 2/3rd in SMFE and 1/3rd in SGSG. The remaining equity allocation will be invested in futures, which are used for shorter term asset allocation views for portfolio efficiency. A similar structure applies to Atlas Multi Asset Portfolios 2 and 3, although each has a lower equity allocation than Atlas Multi Asset Portfolio 1.

Because these changes have not increased the investment fees, and because we believe that this strategy will provide higher returns over the longer-term than a strategy which does not actively integrate ESG principles, it was felt to be unnecessary to canvass members views before implementing them.

In respect of the Ancillary Defaults/self-select options, we have determined that to the greatest extent possible, whilst still recognising the desire to provide appropriate choice to enable self-select members to pursue their own investment beliefs, the investment options that we make available to Atlas members will be restricted to those offered by fund managers who are signatories to the United Nations Principles for Responsible Investing (PRI). PRI is the world's leading proponent of responsible investment – see <https://www.unpri.org>.

Governance Statement

Environmental, Social and Governance (ESG) Investment (continued)

These principles are set out below (in italics). We acknowledge that we cannot directly influence the ESG policies in which pooled funds invest but by requiring that the appointed managers abide by the six principles noted below, it can ensure that those investment managers take appropriate steps to invest sustainably.

'As institutional investors, we have a duty to act in the best long-term interests of our beneficiaries. In this fiduciary role, we believe that ESG issues can affect the performance of investment portfolios (to varying degrees across companies, sectors, regions, asset classes and through time). We also recognise that applying these Principles may better align investors with broader objectives of society. Therefore, where consistent with our fiduciary responsibilities, we commit to the following:

- We will incorporate ESG issues into investment analysis and decision-making processes.*
- We will be active owners and incorporate ESG issues into our ownership policies and practices.*
- We will seek appropriate disclosure on ESG issues by the entities in which we invest.*
- We will promote acceptance and implementation of the Principles within the investment industry.*
- We will work together to enhance our effectiveness in implementing the Principles.*
- We will each report on our activities and progress towards implementing the Principles'.*

We believe that the requirement for our investment partners to be PRI signatories is a key part of our engagement policy as far as ESG matters are concerned.

Employer-related investments

The Trustee's policy is not to hold any employer-related investments directly as defined in the Pensions Act 1995, the Pensions Act 2004 and the Occupational Pension Schemes (Investment) Regulations 2005.

Stock lending

Whilst we acknowledge that by investing in pooled investment funds through a third party investment platform and, therefore, having no direct influence over the investment policies of our investment managers, we do acknowledge that performance may be enhanced through such activity and we are willing to accept it within a suitably controlled environment. We therefore monitor the position of the funds, particularly in relation to stock lending and the risks associated with it.

A number of the funds available for the members to invest in participate in stock lending within limits set by the boards of each investment manager. We are satisfied with the protections in place for investors, which we monitor with support from our Investment Advisers.

We will review this position on a regular basis to ensure that an appropriate level of protection remains in place.

Governance Statement

Compliance with the Occupational Pension Schemes

(Investment and Disclosure) (Amendment) Regulations 2019

Atlas is a commercial Master Trust which operates a 'bundled' fee structure, whereby a charge is levied against members' accumulated funds for the provision of all services – governance, administration, investment and member engagement. We apply a single charge (called a Total Expense Ratio – or TER) which varies according to the investments selected by members (or into which they are defaulted) and which can vary depending on the size of the fee, which generally varies according to the size of the organisation for whom they work.

The investment component of the fee –expressed as a percentage of total funds under management – is itself split into two component parts. The first is a platform fee. This is a fee to the platform provider for providing the platform service, and is a fixed percentage of assets under management. This fee is necessary to provide the platform service which the Trustee requires in order to implement and carry out its investment strategy. The second is the fee paid to the underlying fund manager for the selected funds. This fee varies according to the type of fund and the fund manager. Generally speaking, it is fixed by the fund manager and the same charge is made to all of their clients. However, on some occasions, we may be able to negotiate fee discounts. Our strategy is to consider fees as a key element of the manager selection process once we have determined which type of funds we wish to make available to members. For example, if we determine to offer a UK Equity fund, and two different managers can offer an otherwise identical product, with very similar focus on ESG and corporate engagement activities, we will generally select the manager with the lower fee. The only incentive for any fund manager selected by us is for us to retain them in our fund line-up for the longer term. This requires them, in most circumstances, simply to perform in accordance with our Investment Management Agreements with them (where applicable) and/or to achieve the return objectives set for them, within acceptable risk parameters, and to pay due regard to the level of ESG and corporate engagement activities that we require of them. We recognise the importance for transparency in charging and we review all fund and platform charges regularly to ensure transparency and value for money.

Our investment advisers are paid on a time-cost or fixed fee basis as noted above under 'Investment Advisers', as agreed between us and our investment advisers from time-to-time.

Incentives

As mentioned above, there are no incentive-based fees for investment managers in respect of **decision making** and **engagement**. Rather than directing or incentivising any manager to behave or perform in a particular manner, we implement the strategy set out in this SIP by choosing funds and investment managers which are most closely aligned to our strategy and to our beliefs.

Governance Statement

Incentives (continued)

We expect the managers we appoint to exercise their stewardship of Atlas' assets by paying appropriate regard to the investee companies' performance, strategy, capital structure, management of actual or potential conflicts of interest, risks, social and environmental impact and corporate governance. This is especially so for active fund managers – in particular Schroders - when considering the purchase, retention or sale of investments. For passive fund managers, we recognise that there are limitations to the amount of discretion that managers can exercise, since generally they must simply mirror the holdings of the index they are tracking.

We oversee the voting and engagement activities of the managers we appoint to ensure compliance with this requirement. Reporting on the voting and engagement activities and (where appropriate), how these activities have had a bearing on the purchase, retention and sale of investments, is included in the investment monitoring reports we commission from our investment advisers.

Duration of investment manager appointments

Our investment horizon is long-term. By that we mean a 20 to 30 year investment horizon for the accumulation phase (the period during which we expect assets to grow the fastest and where volatility is less important) and a 5 to 20 year investment horizon during the decumulation phase (the period during which members are drawing down their pension pots, where our principle aim is to balance lower growth potential with reduced investment volatility). These timeframes reflect Atlas members' median age demographics and (for decumulation) our expectation that most members will require a temporary, rather than permanent, drawdown solution. (That is, that they will use Atlas to support shorter retirement needs but may choose to annuitise at a later date to ensure a guaranteed income). Our performance reviews take account of these time horizons which means that we do not expect to take precipitous action (such as replacing a fund manager) during periods of short-term underperformance. Consequently, there is no fixed duration for any of our fund manager appointments. As noted above, appointments can be expected to endure over the longer term so long as the fund remains relevant to our strategy and the fund manager achieves, over the longer term, the financial objectives we set for them, whilst simultaneously adhering to the methods and principles we identified in their selection and meeting our requirements for their ESG and engagement activity.

The date of appointment for each of the investment managers we have appointed is shown in Appendix 4.

Our evaluation of funds and investment managers is set out in our Annual Planner: despite our focus being on long-term investment horizons, we review performance of all funds on a quarterly basis with the aim of identifying any issues or trends that might give rise to concern about longer-term performance.

Governance Statement

Duration of investment manager appointments (continued)

There is no prescribed timeframe for any investment manager appointment. The decision to appoint a manager is through an evaluation process to determine which managers and funds are best aligned with our requirements and beliefs to deliver Atlas' investment strategy. Once appointed, the performance of each fund available to members is then monitored on a quarterly basis. We may also commission additional reports in respect of any funds which have under (or over) performed against target benchmark in respect of both the returns expected and the level of risk taken by the manager to achieve that return, to aid our assessment of whether that performance is explicable or a short term anomaly, or whether it is indicative of a trend that we need to be concerned about.

Transaction costs

Transaction costs, including *portfolio turnover costs*, incurred by Schroders in managing the funds that make up our Primary Defaults are monitored quarterly. We fully anticipate and expect such costs in these actively managed funds, accepting that they are an inevitability of the investment mandate we have with them. There is no targeted portfolio turnover, nor minimum and maximum range. It is our opinion that such constraints would lead to a compromised investment approach which would reduce the likelihood of Schroders delivering the targeted returns. In order to help us maintain oversight of Schroders' operational and transaction cost efficiency, we receive annual reports from an independent organisation which specialises in analysis of this nature.

Transaction Costs for other core managers are collated at least once each year and used for on-line projections designed to demonstrate Reduction in Yield (or fee drag) to members. This enables us to identify both the actual costs and any trends in direction for further investigation. Each year, we commission a report from our investment adviser comparing transaction costs incurred by our core managers against what would be expected from such funds. This helps us gauge proportionality of the transaction costs incurred by the managers we have appointed.

Review of this SIP

We will review this SIP at least once every three years and without delay after any significant change in investment policy. Any change to this SIP will only be made after having consulted the Founding Employer and where appropriate after having obtained and considered the written advice of a party who we believe to be qualified by their ability in and practical experience of financial matters and to have the appropriate knowledge and experience of the management of pension scheme investments.

Signed on behalf of the ATLAS MASTER TRUST TRUSTEE LTD

Trustee Director (Print name): A K Whalley

Trustee Director (Signature):



Date: 15 September 2021

Governance Statement

Appendix 3 – Lifestyle strategies

Upon joining the Plan, unless the employer has selected otherwise, members will automatically be invested in the Primary Default investment strategy, the lifestyle matrix is shown below:

Higher Equity Strategy Drawdown Lifestyle Option (Default) (a Primary Default Strategy)

Years to retirement	Multi Asset Portfolio 1	Multi Asset Portfolio 2	Multi Asset Portfolio 3	Cash
35 or more	100.00%	0.00%	0.00%	0.00%
34	100.00%	0.00%	0.00%	0.00%
33	100.00%	0.00%	0.00%	0.00%
32	100.00%	0.00%	0.00%	0.00%
31	100.00%	0.00%	0.00%	0.00%
30	100.00%	0.00%	0.00%	0.00%
29	100.00%	0.00%	0.00%	0.00%
28	100.00%	0.00%	0.00%	0.00%
27	100.00%	0.00%	0.00%	0.00%
26	100.00%	0.00%	0.00%	0.00%
25	100.00%	0.00%	0.00%	0.00%
24	100.00%	0.00%	0.00%	0.00%
23	100.00%	0.00%	0.00%	0.00%
22	100.00%	0.00%	0.00%	0.00%
21	100.00%	0.00%	0.00%	0.00%
20	100.00%	0.00%	0.00%	0.00%
19	100.00%	0.00%	0.00%	0.00%
18	100.00%	0.00%	0.00%	0.00%
17	100.00%	0.00%	0.00%	0.00%
16	100.00%	0.00%	0.00%	0.00%
15	100.00%	0.00%	0.00%	0.00%
14	100.00%	0.00%	0.00%	0.00%
13	100.00%	0.00%	0.00%	0.00%
12	100.00%	0.00%	0.00%	0.00%
11	100.00%	0.00%	0.00%	0.00%
10	100.00%	0.00%	0.00%	0.00%
9	90.00%	0.00%	10.00%	0.00%
8	80.00%	0.00%	20.00%	0.00%
7	70.00%	0.00%	30.00%	0.00%
6	60.00%	0.00%	40.00%	0.00%
5	50.00%	0.00%	50.00%	0.00%
4	40.00%	0.00%	60.00%	0.00%
3	30.00%	0.00%	70.00%	0.00%
2	20.00%	0.00%	72.00%	8.00%
1	10.00%	0.00%	74.00%	16.00%
at retirement	0.00%	0.00%	75.00%	25.00%

Governance Statement

Once members have joined the Plan, they are able to select from any of the other investment options available, including eight further lifestyle options. However, members cannot invest in more than one lifestyle option or a combination of Ancillary Defaults/self-select funds and one lifestyle option at the same time.

Moderate Equity Strategy Drawdown lifestyle option (Primary Default Strategy)

Years to retirement	Multi Asset Portfolio 1	Multi Asset Portfolio 2	Multi Asset Portfolio 3	Cash
35 or more	100.00%	0.00%	0.00%	0.00%
34	100.00%	0.00%	0.00%	0.00%
33	100.00%	0.00%	0.00%	0.00%
32	100.00%	0.00%	0.00%	0.00%
31	100.00%	0.00%	0.00%	0.00%
30	100.00%	0.00%	0.00%	0.00%
29	100.00%	0.00%	0.00%	0.00%
28	100.00%	0.00%	0.00%	0.00%
27	100.00%	0.00%	0.00%	0.00%
26	100.00%	0.00%	0.00%	0.00%
25	100.00%	0.00%	0.00%	0.00%
24	100.00%	0.00%	0.00%	0.00%
23	100.00%	0.00%	0.00%	0.00%
22	100.00%	0.00%	0.00%	0.00%
21	100.00%	0.00%	0.00%	0.00%
20	100.00%	0.00%	0.00%	0.00%
19	80.00%	20.00%	0.00%	0.00%
18	60.00%	40.00%	0.00%	0.00%
17	40.00%	60.00%	0.00%	0.00%
16	20.00%	80.00%	0.00%	0.00%
15	0.00%	100.00%	0.00%	0.00%
14	0.00%	100.00%	0.00%	0.00%
13	0.00%	100.00%	0.00%	0.00%
12	0.00%	100.00%	0.00%	0.00%
11	0.00%	100.00%	0.00%	0.00%
10	0.00%	100.00%	0.00%	0.00%
9	0.00%	90.00%	10.00%	0.00%
8	0.00%	80.00%	20.00%	0.00%
7	0.00%	70.00%	30.00%	0.00%
6	0.00%	60.00%	40.00%	0.00%
5	0.00%	50.00%	50.00%	0.00%
4	0.00%	40.00%	60.00%	0.00%

Governance Statement

Moderate Equity Strategy Drawdown lifestyle option (Primary Default Strategy) (continued)

Years to retirement	Multi Asset Portfolio 1	Multi Asset Portfolio 2	Multi Asset Portfolio 3	Cash
3	0.00%	30.00%	70.00%	0.00%
2	0.00%	20.00%	72.00%	8.00%
1	0.00%	10.00%	74.00%	16.00%
at retirement	0.00%	0.00%	75.00%	25.00%

Governance Statement

Lower Equity Strategy Drawdown lifestyle option (Primary Default Strategy)

Years to retirement	Multi Asset Portfolio 1	Multi Asset Portfolio 2	Multi Asset Portfolio 3	Cash
35 or more	0.00%	100.00%	0.00%	0.00%
34	0.00%	100.00%	0.00%	0.00%
33	0.00%	100.00%	0.00%	0.00%
32	0.00%	100.00%	0.00%	0.00%
31	0.00%	100.00%	0.00%	0.00%
30	0.00%	100.00%	0.00%	0.00%
29	0.00%	100.00%	0.00%	0.00%
28	0.00%	100.00%	0.00%	0.00%
27	0.00%	100.00%	0.00%	0.00%
26	0.00%	100.00%	0.00%	0.00%
25	0.00%	100.00%	0.00%	0.00%
24	0.00%	100.00%	0.00%	0.00%
23	0.00%	100.00%	0.00%	0.00%
22	0.00%	100.00%	0.00%	0.00%
21	0.00%	100.00%	0.00%	0.00%
20	0.00%	100.00%	0.00%	0.00%
19	0.00%	100.00%	0.00%	0.00%
18	0.00%	100.00%	0.00%	0.00%
17	0.00%	100.00%	0.00%	0.00%
16	0.00%	100.00%	0.00%	0.00%
15	0.00%	100.00%	0.00%	0.00%
14	0.00%	100.00%	0.00%	0.00%
13	0.00%	100.00%	0.00%	0.00%
12	0.00%	100.00%	0.00%	0.00%
11	0.00%	100.00%	0.00%	0.00%
10	0.00%	100.00%	0.00%	0.00%
9	0.00%	90.00%	10.00%	0.00%
8	0.00%	80.00%	20.00%	0.00%
7	0.00%	70.00%	30.00%	0.00%
6	0.00%	60.00%	40.00%	0.00%
5	0.00%	50.00%	50.00%	0.00%
4	0.00%	40.00%	60.00%	0.00%
3	0.00%	30.00%	70.00%	0.00%
2	0.00%	20.00%	72.00%	8.00%
1	0.00%	10.00%	74.00%	15.00%
at retirement	0.00%	0.00%	75.00%	25.00%

Governance Statement

Higher Equity Strategy Annuity lifestyle option (Primary Default Strategy)

Years to retirement	Multi Asset Portfolio 1	Multi Asset Portfolio 2	Multi Asset Portfolio 3	Level Annuity Target	Cash
35 or more	100.00%	0.00%	0.00%	0.00%	0.00%
34	100.00%	0.00%	0.00%	0.00%	0.00%
33	100.00%	0.00%	0.00%	0.00%	0.00%
32	100.00%	0.00%	0.00%	0.00%	0.00%
31	100.00%	0.00%	0.00%	0.00%	0.00%
30	100.00%	0.00%	0.00%	0.00%	0.00%
29	100.00%	0.00%	0.00%	0.00%	0.00%
28	100.00%	0.00%	0.00%	0.00%	0.00%
27	100.00%	0.00%	0.00%	0.00%	0.00%
26	100.00%	0.00%	0.00%	0.00%	0.00%
25	100.00%	0.00%	0.00%	0.00%	0.00%
24	100.00%	0.00%	0.00%	0.00%	0.00%
23	100.00%	0.00%	0.00%	0.00%	0.00%
22	100.00%	0.00%	0.00%	0.00%	0.00%
21	100.00%	0.00%	0.00%	0.00%	0.00%
20	100.00%	0.00%	0.00%	0.00%	0.00%
19	100.00%	0.00%	0.00%	0.00%	0.00%
18	100.00%	0.00%	0.00%	0.00%	0.00%
17	100.00%	0.00%	0.00%	0.00%	0.00%
16	100.00%	0.00%	0.00%	0.00%	0.00%
15	100.00%	0.00%	0.00%	0.00%	0.00%
14	100.00%	0.00%	0.00%	0.00%	0.00%
13	100.00%	0.00%	0.00%	0.00%	0.00%
12	100.00%	0.00%	0.00%	0.00%	0.00%
11	100.00%	0.00%	0.00%	0.00%	0.00%
10	100.00%	0.00%	0.00%	0.00%	0.00%
9	90.00%	0.00%	0.00%	10.00%	0.00%
8	80.00%	0.00%	0.00%	20.00%	0.00%
7	70.00%	0.00%	0.00%	30.00%	0.00%
6	60.00%	0.00%	0.00%	40.00%	0.00%
5	50.00%	0.00%	0.00%	50.00%	0.00%
4	40.00%	0.00%	0.00%	60.00%	0.00%
3	30.00%	0.00%	0.00%	70.00%	0.00%
2	20.00%	0.00%	0.00%	72.00%	8.00%
1	10.00%	0.00%	0.00%	74.00%	16.00%
at retirement	0.00%	0.00%	0.00%	75.00%	25.00%

Governance Statement

Medium Equity Strategy Annuity lifestyle option (Primary Default strategy)

Years to retirement	Multi Asset Portfolio 1	Multi Asset Portfolio 2	Multi Asset Portfolio 3	Level Annuity Target	Cash
35 or more	100.00%	0.00%	0.00%	0.00%	0.00%
34	100.00%	0.00%	0.00%	0.00%	0.00%
33	100.00%	0.00%	0.00%	0.00%	0.00%
32	100.00%	0.00%	0.00%	0.00%	0.00%
31	100.00%	0.00%	0.00%	0.00%	0.00%
30	100.00%	0.00%	0.00%	0.00%	0.00%
29	100.00%	0.00%	0.00%	0.00%	0.00%
28	100.00%	0.00%	0.00%	0.00%	0.00%
27	100.00%	0.00%	0.00%	0.00%	0.00%
26	100.00%	0.00%	0.00%	0.00%	0.00%
25	100.00%	0.00%	0.00%	0.00%	0.00%
24	100.00%	0.00%	0.00%	0.00%	0.00%
23	100.00%	0.00%	0.00%	0.00%	0.00%
22	100.00%	0.00%	0.00%	0.00%	0.00%
21	100.00%	0.00%	0.00%	0.00%	0.00%
20	100.00%	0.00%	33.00%	0.00%	0.00%
19	80.00%	20.00%	0.00%	0.00%	0.00%
18	60.00%	40.00%	0.00%	0.00%	0.00%
17	40.00%	60.00%	0.00%	0.00%	0.00%
16	20.00%	80.00%	0.00%	0.00%	0.00%
15	0.00%	100.00%	0.00%	0.00%	0.00%
14	0.00%	100.00%	0.00%	0.00%	0.00%
13	0.00%	100.00%	0.00%	0.00%	0.00%
12	0.00%	100.00%	0.00%	0.00%	0.00%
11	0.00%	100.00%	0.00%	0.00%	0.00%
10	0.00%	100.00%	0.00%	0.00%	0.00%
9	0.00%	90.00%	0.00%	10.00%	0.00%
8	0.00%	80.00%	0.00%	20.00%	0.00%
7	0.00%	70.00%	0.00%	30.00%	0.00%
6	0.00%	60.00%	0.00%	40.00%	0.00%
5	0.00%	50.00%	0.00%	50.00%	0.00%
4	0.00%	40.00%	0.00%	60.00%	0.00%
3	0.00%	30.00%	0.00%	70.00%	0.00%
2	0.00%	20.00%	0.00%	72.00%	8.00%
1	0.00%	10.00%	0.00%	74.00%	16.00%
at retirement	0.00%	0.00%	0.00%	75.00%	25.00%

Governance Statement

Lower Equity Strategy Annuity lifestyle option (Primary Default strategy)

Years to retirement	Multi Asset Portfolio 1	Multi Asset Portfolio 2	Multi Asset Portfolio 3	Level Annuity Target	Cash
35 or more	0.00%	100.00%	0.00%	0.00%	0.00%
34	0.00%	100.00%	0.00%	0.00%	0.00%
33	0.00%	100.00%	0.00%	0.00%	0.00%
32	0.00%	100.00%	0.00%	0.00%	0.00%
31	0.00%	100.00%	0.00%	0.00%	0.00%
30	0.00%	100.00%	0.00%	0.00%	0.00%
29	0.00%	100.00%	0.00%	0.00%	0.00%
28	0.00%	100.00%	0.00%	0.00%	0.00%
27	0.00%	100.00%	0.00%	0.00%	0.00%
26	0.00%	100.00%	0.00%	0.00%	0.00%
25	0.00%	100.00%	0.00%	0.00%	0.00%
24	0.00%	100.00%	0.00%	0.00%	0.00%
23	0.00%	100.00%	0.00%	0.00%	0.00%
22	0.00%	100.00%	0.00%	0.00%	0.00%
21	0.00%	100.00%	0.00%	0.00%	0.00%
20	0.00%	100.00%	0.00%	0.00%	0.00%
19	0.00%	100.00%	0.00%	0.00%	0.00%
18	0.00%	100.00%	0.00%	0.00%	0.00%
17	0.00%	100.00%	0.00%	0.00%	0.00%
16	0.00%	100.00%	0.00%	0.00%	0.00%
15	0.00%	100.00%	0.00%	0.00%	0.00%
14	0.00%	100.00%	0.00%	0.00%	0.00%
13	0.00%	100.00%	0.00%	0.00%	0.00%
12	0.00%	100.00%	0.00%	0.00%	0.00%
11	0.00%	100.00%	0.00%	0.00%	0.00%
10	0.00%	100.00%	0.00%	0.00%	0.00%
9	0.00%	90.00%	0.00%	10.00%	0.00%
8	0.00%	80.00%	0.00%	20.00%	0.00%
7	0.00%	70.00%	0.00%	30.00%	0.00%
6	0.00%	60.00%	0.00%	40.00%	0.00%
5	0.00%	50.00%	0.00%	50.00%	0.00%
4	0.00%	40.00%	0.00%	60.00%	0.00%
3	0.00%	30.00%	0.00%	70.00%	0.00%
2	0.00%	20.00%	0.00%	72.00%	8.00%
1	0.00%	10.00%	0.00%	74.00%	16.00%
at retirement	0.00%	0.00%	0.00%	75.00%	25.00%

Governance Statement

Higher Equity Strategy Cash lifestyle option (Primary Default strategy)

Years to retirement	Multi Asset Portfolio 1	Multi Asset Portfolio 2	Multi Asset Portfolio 3	Cash
35 or more	100.00%	0.00%	0.00%	0.00%
34	100.00%	0.00%	0.00%	0.00%
33	100.00%	0.00%	0.00%	0.00%
32	100.00%	0.00%	0.00%	0.00%
31	100.00%	0.00%	0.00%	0.00%
30	100.00%	0.00%	0.00%	0.00%
29	100.00%	0.00%	0.00%	0.00%
28	100.00%	0.00%	0.00%	0.00%
27	100.00%	0.00%	0.00%	0.00%
26	100.00%	0.00%	0.00%	0.00%
25	100.00%	0.00%	0.00%	0.00%
24	100.00%	0.00%	0.00%	0.00%
23	100.00%	0.00%	0.00%	0.00%
22	100.00%	0.00%	0.00%	0.00%
21	100.00%	0.00%	0.00%	0.00%
20	100.00%	0.00%	0.00%	0.00%
19	100.00%	0.00%	0.00%	0.00%
18	100.00%	0.00%	0.00%	0.00%
17	100.00%	0.00%	0.00%	0.00%
16	100.00%	0.00%	0.00%	0.00%
15	100.00%	0.00%	0.00%	0.00%
14	100.00%	0.00%	0.00%	0.00%
13	100.00%	0.00%	0.00%	0.00%
12	100.00%	0.00%	0.00%	0.00%
11	100.00%	0.00%	0.00%	0.00%
10	100.00%	0.00%	0.00%	0.00%
9	100.00%	0.00%	0.00%	0.00%
8	100.00%	0.00%	0.00%	0.00%
7	100.00%	0.00%	0.00%	0.00%
6	100.00%	0.00%	0.00%	0.00%
5	100.00%	0.00%	0.00%	0.00%
4	80.00%	0.00%	0.00%	20.00%
3	60.00%	0.00%	0.00%	40.00%
2	40.00%	0.00%	0.00%	60.00%
1	20.00%	0.00%	0.00%	80.00%
at retirement	0.00%	0.00%	0.00%	100.00%

Governance Statement

Medium Equity Strategy Cash lifestyle option (Primary Default strategy)

Years to retirement	Multi Asset Portfolio 1	Multi Asset Portfolio 2	Multi Asset Portfolio 3	Cash
35 or more	100.00%	0.00%	0.00%	0.00%
34	100.00%	0.00%	0.00%	0.00%
33	100.00%	0.00%	0.00%	0.00%
32	100.00%	0.00%	0.00%	0.00%
31	100.00%	0.00%	0.00%	0.00%
30	100.00%	0.00%	0.00%	0.00%
29	100.00%	0.00%	0.00%	0.00%
28	100.00%	0.00%	0.00%	0.00%
27	100.00%	0.00%	0.00%	0.00%
26	100.00%	0.00%	0.00%	0.00%
25	100.00%	0.00%	0.00%	0.00%
24	100.00%	0.00%	0.00%	0.00%
23	100.00%	0.00%	0.00%	0.00%
22	100.00%	0.00%	0.00%	0.00%
21	100.00%	0.00%	0.00%	0.00%
20	100.00%	0.00%	0.00%	0.00%
19	80.00%	20.00%	0.00%	0.00%
18	60.00%	40.00%	0.00%	0.00%
17	40.00%	60.00%	0.00%	0.00%
16	20.00%	80.00%	0.00%	0.00%
15	0.00%	100.00%	0.00%	0.00%
14	0.00%	100.00%	0.00%	0.00%
13	0.00%	100.00%	0.00%	0.00%
12	0.00%	100.00%	0.00%	0.00%
11	0.00%	100.00%	0.00%	0.00%
10	0.00%	100.00%	0.00%	0.00%
9	0.00%	100.00%	0.00%	0.00%
8	0.00%	100.00%	0.00%	0.00%
7	0.00%	100.00%	0.00%	0.00%
6	0.00%	100.00%	0.00%	0.00%
5	0.00%	100.00%	0.00%	0.00%
4	0.00%	80.00%	0.00%	20.00%
3	0.00%	60.00%	0.00%	40.00%
2	0.00%	40.00%	0.00%	60.00%
1	0.00%	20.00%	0.00%	80.00%
at retirement	0.00%	0.00%	0.00%	100.00%

Governance Statement

Lower Equity Strategy Cash lifestyle option (Primary Default strategy)

Years to retirement	Multi Asset Portfolio 1	Multi Asset Portfolio 2	Multi Asset Portfolio 3	Cash
35 or more	0.00%	100.00%	0.00%	0.00%
34	0.00%	100.00%	0.00%	0.00%
33	0.00%	100.00%	0.00%	0.00%
32	0.00%	100.00%	0.00%	0.00%
31	0.00%	100.00%	0.00%	0.00%
30	0.00%	100.00%	0.00%	0.00%
29	0.00%	100.00%	0.00%	0.00%
28	0.00%	100.00%	0.00%	0.00%
27	0.00%	100.00%	0.00%	0.00%
26	0.00%	100.00%	0.00%	0.00%
25	0.00%	100.00%	0.00%	0.00%
24	0.00%	100.00%	0.00%	0.00%
23	0.00%	100.00%	0.00%	0.00%
22	0.00%	100.00%	0.00%	0.00%
21	0.00%	100.00%	0.00%	0.00%
20	0.00%	100.00%	0.00%	0.00%
19	0.00%	100.00%	0.00%	0.00%
18	0.00%	100.00%	0.00%	0.00%
17	0.00%	100.00%	0.00%	0.00%
16	0.00%	100.00%	0.00%	0.00%
15	0.00%	100.00%	0.00%	0.00%
14	0.00%	100.00%	0.00%	0.00%
13	0.00%	100.00%	0.00%	0.00%
12	0.00%	100.00%	0.00%	0.00%
11	0.00%	100.00%	0.00%	0.00%
10	0.00%	100.00%	0.00%	0.00%
9	0.00%	100.00%	0.00%	0.00%
8	0.00%	100.00%	0.00%	0.00%
7	0.00%	100.00%	0.00%	0.00%
6	0.00%	100.00%	0.00%	0.00%
5	0.00%	100.00%	0.00%	0.00%
4	0.00%	80.00%	0.00%	20.00%
3	0.00%	60.00%	0.00%	40.00%
2	0.00%	40.00%	0.00%	60.00%
1	0.00%	20.00%	0.00%	80.00%
at retirement	0.00%	0.00%	0.00%	100.00%

Governance Statement

Appendix 4 – Ancillary Defaults/Self-select Funds

The full range of funds shown below is available to members to choose from if they wish. Charges for each fund are not shown as these will vary depending on the series of fund invested in. This information is provided in Investment Guides and is also available on-line or on request. Participating employers and members should therefore reference their own personalised documentation for further details.

Category	Fund name	Objective	Benchmark	Underlying funds/benchmark allocation		Date investment manager appointed
Multi Asset	Atlas Multi Asset Portfolio 1	The objective of the fund is to provide long term growth through exposure to a range of asset classes, including but not limited to equities, fixed interest, cash, property and other alternatives both in the UK and overseas. This Fund offers a higher risk approach compared to the other multi asset portfolios.	80.00% MSCI, ACWI, NDR, TL – 50% hedged / unhedged to GBP 10.00% BGAT hedged to GDP 10.00% BGAC hedged to GBP	Strategic Allocation	Permitted Ranges	6 December 2017
				Global Equites (unhedged) (40%)	65 – 95%	
				Global Equites (hedged) (40%)		
				Global Sovereign Bonds (10%)	5 – 30%	
				Global Corporate Bonds (10%)		
				Cash (0%)	0% – 20%	
	Atlas Multi Asset Portfolio 2	The objective of the fund is to provide long term growth through exposure to a range of asset classes, including but not limited to equities, fixed interest, cash, property and other alternatives both in the UK and overseas. This Fund has a middle level of risk compared to the other multi asset portfolios.	60.00% MSCI, ACWI, NDR, TL – 50% hedged / unhedged to GNP 20.00% BGAT hedged to GBP 20% BGAC hedged to GMP	Strategic Allocation	Permitted Ranges	6 December 2017
				Global Equites (unhedged) (30%)	40 – 75%	
				Global Equites (hedged) (30%)		
				Global Sovereign Bonds (20%)	20 – 50%	
				Global Corporate Bonds (20%)		
				Cash (0%)	0% - 20%	

Governance Statement

Category	Fund name	Objective	Benchmark	Underlying funds/benchmark allocation		Date investment manager appointed
	Atlas Multi Asset Portfolio 3	The objective of the fund is to provide long term growth through exposure to a range of asset classes, including but not limited to equities, fixed interest, cash, property and other alternatives both in the UK and overseas. This Fund offers a lower risk approach compared to the other multi asset portfolios.	40.00% MSCI, ACWI, NDR, TL – 50% hedged / unhedged to GBP 30.00% BGAT hedged to GBP 30.00% BGAC hedged to GBP	Strategic Allocation	Permitted Ranges	6 December 2017
				Global Equites (unhedged) (20%)	25 – 55%	
				Global Equites (hedged) (20%)		
				Global Sovereign Bonds (30%)	40 – 70%	
				Global Corporate Bonds (30%)		
				Cash (0%)	0% - 20%	
	Atlas Multi Asset Absolute Return	The Fund aims to provide positive investment returns in all market conditions over the medium to long term. The fund is actively managed, with a wide investment remit to target a long-term growth. It exploits market inefficiencies through active allocation to a diverse range of market positions. The fund uses a combination of traditional assets (such as equities and bonds) and investment strategies based on advanced derivative techniques, resulting in a highly diversified portfolio. The fund can take long and short positions in markets, securities and groups of securities through derivative contracts.	100.00% SONIA (6m) +5% p.a.	50% Nordea GBP Diversified Return Fund 50% Invesco Global Target Return Fund		12 February 2019

Governance Statement

Category	Fund name	Objective	Benchmark	Underlying funds/benchmark allocation	Date investment manager appointed
	Atlas Active Multi Asset	<p>The fund aims to achieve a return in line with its benchmark over a market cycle, which is typically about five years. The target is to achieve this level of return with approximately one half to two thirds of the volatility associated with an all equity portfolio.</p> <p>The fund seeks to meet the return objective through investment in a diversified range of growth asset classes. The portfolio is actively managed with exposure to the underlying asset classes adjusted in line with the Manager's views.</p>	100.00% CPI +4% p.a.	100.00% Schroder Life Dynamic Multi Asset	31 July 2015
	Atlas Passive Multi Asset	The fund aims to provide long-term investment growth through exposure to a diversified range of asset classes.	100.00% SONIA (3m) +3.5% p.a.	100.00% LGIM Diversified	31 July 2015

Governance Statement

Category	Fund name	Objective	Benchmark	Underlying funds/benchmark allocation	Date investment manager appointed
Equities	Atlas Global Equity Index Tracker	This fund seeks long-term capital growth by investing primarily in equity securities of companies. The fund aims to track the performance of the benchmark which is composed of the underlying regions in which the fund invests.	45.00% FTSE All Share Index 15.75% FTSE North American Index 15.75% FTSE Europe (ex UK) Index 7.88% FTSE Japan Index 5.62% FTSE Asia Pacific (ex-Japan) Index 10.00% FTSE All-World Emerging Index	45.00% LGIM UK Equity Index 15.75% LGIM North America Equity Index 15.75% LGIM Europe ex UK Equity Index 7.88% LGIM Japan Equity Index 5.62% LGIM Asia Pacific (ex Japan) Developed Equity Index 10.00% LGIM World Emerging Markets Equity Index	31 July 2015
	Atlas UK Equity Index Tracker	The investment objective of the fund is to track the performance of the FTSE All-Share Index.	100.00% FTSE All Share Index	100.00% LGIM UK Equity Index	31 July 2015
	Atlas North American Equity Index Tracker	The investment objective of the fund is to track the performance of the FTSE World North America Index.	100.00% FTSE North American Index	100.00% LGIM North America Equity Index	31 July 2015

Governance Statement

Category	Fund name	Objective	Benchmark	Underlying funds/benchmark allocation	Date investment manager appointed
	Atlas Europe (excluding UK) Equity Index Tracker	The investment objective of the fund is to track the performance of the FTSE Developed Europe (ex-UK) Index.	100.00% FTSE Europe (ex UK) Index	100.00% LGIM Europe ex UK Equity Index	31 July 2015
	Atlas Japan Equity Index Tracker	The investment objective of the fund is to track the performance of the FTSE Japan Index.	100.00% FTSE Japan Index	100.00% LGIM Japan Equity Index	31 July 2015
	Atlas Asia Pacific (excluding Japan) Equity Index Tracker	The investment objective of the fund is to track the performance of the FTSE Developed Asia Pacific (ex-Japan) Index.	100.00% FTSE Asia Pacific (ex-Japan) Index	100.00% LGIM Asia Pacific (ex Japan) Developed Equity Index	31 July 2015
	Atlas World (excluding UK) Equity Index Tracker	The investment objective of the fund is to track the performance of the FTSE Developed (ex UK) Index (less withholding tax if applicable) to within +/- 0.5% p.a. for two years out of three.	100.00% FTSE World ex UK Index	100.00% LGIM World Developed (ex UK) Equity Index	31 July 2015
	Atlas Emerging Markets Equity Index Tracker	This fund seeks long-term capital growth by investing primarily in equity securities, of companies whose principal activities are located in emerging market countries. This Fund aims to produce a return in line with the benchmark.	100.00% FTSE All-World Emerging Index	100.00% LGIM World Emerging Market Equity Index	31 July 2015

Governance Statement

Category	Fund name	Objective	Benchmark	Underlying funds/benchmark allocation	Date investment manager appointed
	Atlas Active Emerging Markets Equities	This fund seeks long-term capital growth by investing primarily in equity securities, of companies whose principal activities are located in emerging market countries. This Fund is actively managed and aims to beat the benchmark return.	100.00% MSCI Emerging Markets Index	100.00% Lazard Emerging Markets Equity Index	31 July 2015
	Atlas Sustainability Equity	The fund seeks to provide capital growth in excess of the MSCI All Countries World Index (net of fees) over the market cycle (typically 3 to 5 years) by investing in equities of companies worldwide	MSCI AC World TR Net (GBP)	100% Schroder Sustainable Multi-Factor Equity Fund	21 October 2019

Governance Statement

Category	Fund name	Objective	Benchmark	Underlying funds/benchmark allocation	Date investment manager appointed
	Capita Active Global Equity	The investment objective of the fund is to beat the benchmark return	20.00% FTSE All Share 11.00% FTSE World Europe ex UK 15.00% MSCI World Small Cap 19.00% FTSE USA 10.00% MSCI World 5.00% FTSE Japan 4.00% FTSE Asia Pacific ex Japan 16.00% MSCI Emerging Markets	10% Schroder UK Specialist Value Equity Fund 10% Baille Gifford UK Equity Focus Fund 19% BlackRock US Equity Index Fund 16% Stewart Investors Global Emerging Markets Leaders Fund 15% Dimensional Global Smaller Companies Fund 11% Lazard Continental European Equity (ex UK) Alpha Fund 10% Vertias Global Focus Fund 5% Baillie Gifford Japanese Equity Pension Fund 4% Stewart Investors Asia Pacific Leaders Fund	19 October 2016

Governance Statement

Category	Fund name	Objective	Benchmark	Underlying funds/benchmark allocation	Date investment manager appointed
	Capita Passive Global Equity	The investment objective of the Fund is to track the performance of the benchmark	20.00% (LGIM) FTSE All Share 5% Capped 34.00% (LGIM) FTSE North America Hedged GBP 15.00% (LGIM) FTSE Developed Europe ex UK Hedged 95 8.00% (LGIM) FTSE Japan Hedged Sterling 18.00% (LGIM) FTSE All World Emerging	20% LGIM UK Equity Index Fund 34% LGIM North American Index Fund 18% LGIM World Emerging Markets Equity Index Fund 15% LGIM European (ex UK) Index Fund 8% LGIM Japan Equity Index Fund 5% LGIM Asia Pacific (ex Japan) Developed Equity Index Fund	19 October 2016

Governance Statement

Category	Fund name	Objective	Benchmark	Underlying funds/benchmark allocation	Date investment manager appointed
Bonds	Atlas Corporate Bond Index Tracker	The investment objective of the fund is to track the performance of the iBoxx £ Non-Gilts (All Stocks) Index.	100.00% IBOXX UK Sterling Non-Gilts All Maturities Index	100.00% LGIM Investment Grade Corporate Bonds All Stocks Index	31 July 2015
	Atlas Over 15 Years Gilts Index Tracker	The investment objective of the fund is to track the performance of the FTSE A Government (Over 15 Year) Index.	100.00% FTSE British Government Over 15 years Index	100.00% LGIM Over 15 Years Gilts Index	31 July 2015
	Atlas Over 5 Years Index-Linked Gilts Index Tracker	The investment objective of the fund is to track the performance of the FTSE A Index-Linked (Over 5 Year) Index.	100.00% FTSE Inflation-Linked Gilt Over 5 Year Index	100.00% LGIM Over 5 Year Index-Linked Gilts Index	31 July 2015
	Atlas Active Corporate Bond	The fund aims to invest in sterling denominated fixed and variable rate securities, such as corporate bonds. These assets should give lower, but steady, growth over the long term when compared to equity investments. However, the value of investments can still fluctuate up and down in value.	100.00% ABI Sterling Corporate Bond Sector	100.00% M&G Corporate Bond	31 July 2015

Governance Statement

Category	Fund name	Objective	Benchmark	Underlying funds/benchmark allocation	Date investment manager appointed
Cash	Atlas Cash	<p>The fund seeks to maximise current returns consistent with the preservation of capital and liquidity through investment in a portfolio of high quality short term “money market” instruments.</p> <p>Every effort is made to invest in a way which preserves the value of your investment. However, the value of this Fund can go down as well as up and your investment is not guaranteed.</p>	100.00% ABI Money Market Sector Average	100.00% BlackRock Institutional Sterling Liquidity	31 July 2015

Governance Statement

Category	Fund name	Objective	Benchmark	Underlying funds/benchmark allocation	Date investment manager appointed
Pre-Retirement	Atlas Level Annuity Target	<p>The fund aims to invest in a way which matches the broad characteristics of investments underlying the pricing of a typical non-inflation linked annuity. This means that the Fund will invest in different types of bonds, including corporate and government bonds both in the UK and overseas.</p> <p>This fund may be suitable for members who intend to purchase a retirement annuity which does not increase in line with inflation over time.</p>	100.00% ABI Sterling Long Bonds	100.00% LGIM Pre-Retirement	31 July 2015
	Atlas Inflation-Linked Annuity Target	<p>The fund aims to invest in a way which matches the broad characteristics of investments underlying the pricing of a typical inflation linked annuity. This means that the Fund will invest in different types of bonds, including corporate and government bonds both in the UK and overseas.</p> <p>This fund may be suitable for members who intend to purchase a retirement annuity which increases in line with inflation over time.</p>	100.00% ABI Sterling Long Bonds	100.00% LGIM Inflation-linked Pre-Retirement	31 July 2015

Governance Statement

Category	Fund name	Objective	Benchmark	Underlying funds/benchmark allocation	Date investment manager appointed
Pre-Retirement	Atlas Flexible Pre-Retirement	The fund aims to invest in a lower risk manner to provide growth over the long term. It invests in a range of different asset classes including equities, fixed interest, cash, property and others. This fund may be suitable for you if you intend to draw regular or irregular amounts of pension income from your pension savings. The value of investments can go down as well as up and are not guaranteed.	100.00% ABI Mixed Investments (20-60% shares) Sector Average	20.00% Schroder Life Flexible Retirement 15.00% LGIM All Stocks £ Investment Grade Corporate Bonds Index 15.00% LGIM Over 5yr Index-Linked Gilts Index 15.00% LGIM Over 15 Year Gilts Index 17.50% LGIM UK Equity Index 6.13% LGIM North America Equity Index 6.13% LGIM Europe ex UK Equity Index 3.06% LGIM Japan Equity Index 2.18% LGIM Asia Pacific (ex-Japan) Developed Equity Index	31 July 2015

Governance Statement

Category	Fund name	Objective	Benchmark	Underlying funds/benchmark allocation	Date investment manager appointed
At Retirement	Atlas Flexible Access Retirement	<p>The fund aims to invest in a lower risk manner to provide growth over the long term. It invests in a range of different asset classes including equities, fixed interest, cash, property and others.</p> <p>This fund may be suitable for you if you intend to draw regular or irregular amounts of pension income from your pension savings. The value of investments can go down as well as up and are not guaranteed.</p>	100.00% CPI +2% p.a.	100.00% Schroder Flexible Retirement	31 July 2015

Governance Statement

Category	Fund name	Objective	Benchmark	Underlying fund/Benchmark allocation	Date investment manager appointed
	Atlas Retirement Income Drawdown	<p>The fund aims to provide long-term investment growth up to and during retirement, and to facilitate the drawdown of retirement income. The fund invests globally in a range of different asset classes. The fund invests in both index tracking and actively managed funds.</p> <p>This fund may be suitable for members who intend to draw regular amounts of pension income from your pension savings. The value of your investments can go down as well as up and is not guaranteed.</p>	100.00% Bank of England Base Rate +3.5% p.a.	100.00% LGIM Retirement Income Multi Asset	31 July 2015

Governance Statement

Category	Fund name	Objective	Benchmark	Underlying funds/benchmark allocation	Date investment manager appointed
Other	Atlas Ethical	The fund aim is to provide capital growth and increasing income over time. The Manager seeks to achieve this by investing mainly in an ethically screened and diversified spread of UK equities. The ethically screening applied to the fund means that a number of the UK's largest companies (those that form part of the FTSE 100 Index) are screened out on ethical grounds. As a result, the fund will usually include significant exposure to medium and smaller companies. Investment is concentrated in companies whose products and operations are considered to be of long-term benefit to the community both at home and abroad.	100.00% FTSE All Share Index	100.00% F&C Responsible UK Equity Growth	31 July 2015
	Atlas Shariah Compliant	The fund aims to offer investors the opportunity to grow their money in line with the performance of the Dow Jones Islamic Titans 100 Index. The fund invests in company shares from around the world and is compliant with Islamic Shariah principles.	100.00% Dow Jones Islamic Titans Index	100.00% HSBC Amanah Global Equity Index	31 July 2015
	Atlas Direct Property	This fund seeks long term capital growth by giving broad exposure to commercial property. The underlying property managers aim to beat the benchmark return over longer periods.	100.00% AREF/IPD All Balanced Property Fund Index	50.00% LGIM Managed Property Fund 50.00% Threadneedle Pooled Pension Funds Property Fund	31 July 2015

Governance Statement

Appendix 5 – Costs and Charges

Information on transaction costs, including some illustrative examples of the effect they have on investment returns, can also be found at:

<http://www.atlasmastertrust.co.uk/library/documents> by selecting your employer.

Employers: HP Inc, Nidec and WestRock

Atlas Master Trust Series Name	TER
Atlas Active Corporate Bond Fund s1	0.500%
Atlas Active Emerging Markets Equity Fund s1	1.070%
Atlas Active Multi Asset Fund s1	0.500%
Atlas Asia Pacific (ex Japan) Equity Index Tracker Fund s1	0.250%
Atlas Cash Fund s1	0.250%
Atlas Corporate Bond Index Tracker Fund s1	0.250%
Atlas Emerging Markets Index Tracker Fund s1	0.330%
Atlas Ethical Fund s1	0.830%
Atlas Europe (ex UK) Equity Index Tracker Fund s1	0.250%
Atlas Flexible Access Retirement Fund s1	0.430%
Atlas Flexible Pre-Retirement Fund s1	0.250%
Atlas Global Equity Index Tracker Fund s1	0.250%
Atlas Inflation-Linked Annuity Target Fund s1	0.250%
Atlas Japan Equity Index Tracker Fund s1	0.250%
Atlas Level Annuity Target Fund s1	0.250%
Atlas Multi Asset Absolute Return Fund s1	0.870%
Atlas Multi Asset Portfolio 1 s1	0.294%
Atlas Multi Asset Portfolio 2 s1	0.303%
Atlas Multi Asset Portfolio 3 s1	0.317%
Atlas North American Equity Index Tracker Fund s1	0.250%
Atlas Over 15 Years Gilts Index Tracker Fund s1	0.250%
Atlas Over 5 Years Index-Linked Gilts Index Tracker Fund s1	0.250%
Atlas Passive Multi Asset Fund s1	0.340%
Atlas Retirement Income Drawdown Fund s1	0.450%
Atlas Shariah Compliant Fund s1	0.450%
Atlas Sustainable Equity Fund s1	0.455%
Atlas UK Direct Property Fund s1	0.850%
Atlas UK Equity Index Tracker Fund s1	0.250%
Atlas World (ex UK) Equity Index Tracker Fund s1	0.288%

Governance Statement

Consolidation Section

Atlas Master Trust Series Name	TER
Atlas Active Corporate Bond Fund s2	0.810%
Atlas Active Emerging Markets Equity Fund s2	1.420%
Atlas Active Multi Asset Fund s2	0.850%
Atlas Asia Pacific (ex Japan) Equity Index Tracker Fund s2	0.550%
Atlas Cash Fund s2	0.590%
Atlas Corporate Bond Index Tracker Fund s2	0.550%
Atlas Emerging Markets Index Tracker Fund s2	0.680%
Atlas Ethical Fund s2	1.180%
Atlas Europe (ex UK) Equity Index Tracker Fund s2	0.550%
Atlas Flexible Access Retirement Fund s2	0.770%
Atlas Flexible Pre-Retirement Fund s2	0.550%
Atlas Global Equity Index Tracker Fund s2	0.554%
Atlas Inflation-Linked Annuity Target Fund s2	0.570%
Atlas Japan Equity Index Tracker Fund s2	0.550%
Atlas Level Annuity Target Fund s2	0.570%
Atlas Multi Asset Absolute Return Fund s2	1.220%
Atlas Multi Asset Portfolio 1 s2	0.644%
Atlas Multi Asset Portfolio 2 s2	0.646%
Atlas Multi Asset Portfolio 3 s2	0.657%
Atlas North American Equity Index Tracker Fund s2	0.550%
Atlas Over 15 Years Gilts Index Tracker Fund s2	0.550%
Atlas Over 5 Years Index-Linked Gilts Index Tracker Fund s2	0.550%
Atlas Passive Multi Asset Fund s2	0.680%
Atlas Retirement Income Drawdown Fund s2	0.800%
Atlas Shariah Compliant Fund s2	0.800%
Atlas Sustainable Equity Fund s2	0.755%
Atlas UK Direct Property Fund s2	1.150%
Atlas UK Equity Index Tracker Fund s2	0.550%
Atlas World (ex UK) Equity Index Tracker Fund s2	0.588%

Governance Statement

Employers: Affinity Workforce, Apex Financial Services, Capita, Fortius, Link Group, Parking Eye, Right Digital Solutions and Education Software Solutions

Atlas Master Trust Series Name	TER
Atlas Active Corporate Bond Fund s3	0.510%
Atlas Active Emerging Markets Equity Fund s3	1.170%
Atlas Active Multi Asset Fund s3	0.600%
Atlas Asia Pacific (ex Japan) Equity Index Tracker Fund s3	0.300%
Atlas Cash Fund s3	0.250%
Atlas Corporate Bond Index Tracker Fund s3	0.250%
Atlas Emerging Markets Index Tracker Fund s3	0.400%
Atlas Ethical Fund s3	0.930%
Atlas Europe (ex UK) Equity Index Tracker Fund s3	0.300%
Atlas Flexible Access Retirement Fund s3	0.560%
Atlas Flexible Pre-Retirement Fund s3	0.350%
Atlas Global Equity Index Tracker Fund s3	0.270%
Atlas Inflation-Linked Annuity Target Fund s3	0.250%
Atlas Japan Equity Index Tracker Fund s3	0.300%
Atlas Level Annuity Target Fund s3	0.250%
Atlas Multi Asset Absolute Return Fund s3	0.750%
Atlas Multi Asset Portfolio 1 s3	0.554%
Atlas Multi Asset Portfolio 2 s3	0.506%
Atlas Multi Asset Portfolio 3 s3	0.467%
Atlas North American Equity Index Tracker Fund s3	0.220%
Atlas Over 15 Years Gilts Index Tracker Fund s3	0.250%
Atlas Over 5 Years Index-Linked Gilts Index Tracker Fund s3	0.250%
Atlas Passive Multi Asset Fund s3	0.470%
Atlas Retirement Income Drawdown Fund s3	0.590%
Atlas Shariah Compliant Fund s3	0.450%
Atlas Sustainable Equity Fund s3	0.545%
Atlas UK Direct Property Fund s3	0.750%
Atlas UK Equity Index Tracker Fund s3	0.300%
Atlas World (ex UK) Equity Index Tracker Fund s3	0.300%
Capita Active Global Equity Fund s3	0.720%
Capita Passive Global Equity Fund s3	0.300%

Governance Statement

Employer: Vertiv

Atlas Master Trust Series Name	TER
Atlas Active Corporate Bond Fund s4	0.410%
Atlas Active Emerging Markets Equity Fund s4	1.030%
Atlas Active Multi Asset Fund s4	0.450%
Atlas Asia Pacific (ex Japan) Equity Index Tracker Fund s4	0.087%
Atlas Cash Fund s4	0.120%
Atlas Corporate Bond Index Tracker Fund s4	0.087%
Atlas Emerging Markets Index Tracker Fund s4	0.250%
Atlas Ethical Fund s4	0.790%
Atlas Europe (ex UK) Equity Index Tracker Fund s4	0.087%
Atlas Flexible Access Retirement Fund s4	0.430%
Atlas Flexible Pre-Retirement Fund s4	0.137%
Atlas Global Equity Index Tracker Fund s4	0.170%
Atlas Inflation-Linked Annuity Target Fund s4	0.150%
Atlas Japan Equity Index Tracker Fund s4	0.087%
Atlas Level Annuity Target Fund s4	0.130%
Atlas Multi Asset Absolute Return Fund s4	0.820%
Atlas Multi Asset Portfolio 1 s4	0.202%
Atlas Multi Asset Portfolio 2 s4	0.202%
Atlas Multi Asset Portfolio 3 s4	0.207%
Atlas North American Equity Index Tracker Fund s4	0.087%
Atlas Over 15 Years Gilts Index Tracker Fund s4	0.087%
Atlas Over 5 Years Index-Linked Gilts Index Tracker Fund s4	0.087%
Atlas Passive Multi Asset Fund s4	0.300%
Atlas Retirement Income Drawdown Fund s4	0.400%
Atlas Shariah Compliant Fund s4	0.400%
Atlas Sustainable Equity Fund s4	0.292%
Atlas UK Direct Property Fund s4	0.700%
Atlas UK Equity Index Tracker Fund s4	0.070%
Atlas World (ex UK) Equity Index Tracker Fund s4	0.125%

Governance Statement

Employer: City Health Care Partnership

Atlas Master Trust Series Name	TER
Atlas Active Corporate Bond Fund s5	0.610%
Atlas Active Emerging Markets Equity Fund s5	1.230%
Atlas Active Multi Asset Fund s5	0.650%
Atlas Asia Pacific (ex Japan) Equity Index Tracker Fund s5	0.350%
Atlas Cash Fund s5	0.400%
Atlas Corporate Bond Index Tracker Fund s5	0.350%
Atlas Emerging Markets Index Tracker Fund s5	0.500%
Atlas Ethical Fund s5	0.990%
Atlas Europe (ex UK) Equity Index Tracker Fund s5	0.350%
Atlas Flexible Access Retirement Fund s5	0.600%
Atlas Flexible Pre-Retirement Fund s5	0.376%
Atlas Global Equity Index Tracker Fund s5	0.400%
Atlas Inflation-Linked Annuity Target Fund s5	0.370%
Atlas Japan Equity Index Tracker Fund s5	0.350%
Atlas Level Annuity Target Fund s5	0.370%
Atlas Multi Asset Absolute Return Fund s5	1.020%
Atlas Multi Asset Portfolio 1 s5	0.454%
Atlas Multi Asset Portfolio 2 s5	0.456%
Atlas Multi Asset Portfolio 3 s5	0.467%
Atlas North American Equity Index Tracker Fund s5	0.350%
Atlas Over 15 Years Gilts Index Tracker Fund s5	0.350%
Atlas Over 5 Years Index-Linked Gilts Index Tracker Fund s5	0.350%
Atlas Passive Multi Asset Fund s5	0.500%
Atlas Retirement Income Drawdown Fund s5	0.600%
Atlas Shariah Compliant Fund s5	0.600%
Atlas Sustainable Equity Fund s5	0.555%
Atlas UK Direct Property Fund s5	1.030%
Atlas UK Equity Index Tracker Fund s5	0.350%
Atlas World (ex UK) Equity Index Tracker Fund s5	0.390%

Governance Statement

Employer: Evergreen Garden Care

Atlas Master Trust Series Name	TER
Atlas Active Corporate Bond Fund s6	0.560%
Atlas Active Emerging Markets Equity Fund s6	1.180%
Atlas Active Multi Asset Fund s6	0.600%
Atlas Asia Pacific (ex Japan) Equity Index Tracker Fund s6	0.285%
Atlas Cash Fund s6	0.340%
Atlas Corporate Bond Index Tracker Fund s6	0.285%
Atlas Emerging Markets Index Tracker Fund s6	0.430%
Atlas Ethical Fund s6	0.940%
Atlas Europe (ex UK) Equity Index Tracker Fund s6	0.285%
Atlas Flexible Access Retirement Fund s6	0.530%
Atlas Flexible Pre-Retirement Fund s6	0.334%
Atlas Global Equity Index Tracker Fund s6	0.300%
Atlas Inflation-Linked Annuity Target Fund s6	0.315%
Atlas Japan Equity Index Tracker Fund s6	0.285%
Atlas Level Annuity Target Fund s6	0.315%
Atlas Multi Asset Absolute Return Fund s6	0.970%
Atlas Multi Asset Portfolio 1 s6	0.400%
Atlas Multi Asset Portfolio 2 s6	0.400%
Atlas Multi Asset Portfolio 3 s6	0.400%
Atlas North American Equity Index Tracker Fund s6	0.285%
Atlas Over 15 Years Gilts Index Tracker Fund s6	0.285%
Atlas Over 5 Years Index-Linked Gilts Index Tracker Fund s6	0.285%
Atlas Passive Multi Asset Fund s6	0.445%
Atlas Retirement Income Drawdown Fund s6	0.550%
Atlas Shariah Compliant Fund s6	0.550%
Atlas Sustainable Equity Fund s6	0.490%
Atlas UK Direct Property Fund s6	0.885%
Atlas UK Equity Index Tracker Fund s6	0.285%
Atlas World (ex UK) Equity Index Tracker Fund s6	0.323%

Governance Statement

Employer: Nifco UK Ltd

Atlas Master Trust Series Name	TER
Atlas Active Corporate Bond Fund s7	0.610%
Atlas Active Emerging Markets Equity Fund s7	1.230%
Atlas Active Multi Asset Fund s7	0.650%
Atlas Asia Pacific (ex Japan) Equity Index Tracker Fund s7	0.335%
Atlas Cash Fund s7	0.390%
Atlas Corporate Bond Index Tracker Fund s7	0.335%
Atlas Emerging Markets Index Tracker Fund s7	0.480%
Atlas Ethical Fund s7	0.990%
Atlas Europe (ex UK) Equity Index Tracker Fund s7	0.335%
Atlas Flexible Access Retirement Fund s7	0.580%
Atlas Flexible Pre-Retirement Fund s7	0.384%
Atlas Global Equity Index Tracker Fund s7	0.350%
Atlas Inflation-Linked Annuity Target Fund s7	0.365%
Atlas Japan Equity Index Tracker Fund s7	0.335%
Atlas Level Annuity Target Fund s7	0.365%
Atlas Multi Asset Absolute Return Fund s7	1.020%
Atlas Multi Asset Portfolio 1 s7	0.450%
Atlas Multi Asset Portfolio 2 s7	0.450%
Atlas Multi Asset Portfolio 3 s7	0.450%
Atlas North American Equity Index Tracker Fund s7	0.335%
Atlas Over 15 Years Gilts Index Tracker Fund s7	0.335%
Atlas Over 5 Years Index-Linked Gilts Index Tracker Fund s7	0.335%
Atlas Passive Multi Asset Fund s7	0.495%
Atlas Retirement Income Drawdown Fund s7	0.600%
Atlas Shariah Compliant Fund s7	0.600%
Atlas Sustainable Equity Fund s7	0.540%
Atlas UK Direct Property Fund s7	0.935%
Atlas UK Equity Index Tracker Fund s7	0.335%
Atlas World (ex UK) Equity Index Tracker Fund s7	0.373%

Governance Statement

Employer: Social Care Institute for Excellence

Atlas Master Trust Series Name	TER
Atlas Active Corporate Bond Fund s8	0.510%
Atlas Active Emerging Markets Equity Fund s8	1.130%
Atlas Active Multi Asset Fund s8	0.500%
Atlas Asia Pacific (ex Japan) Equity Index Tracker Fund s8	0.235%
Atlas Cash Fund s8	0.290%
Atlas Corporate Bond Index Tracker Fund s8	0.235%
Atlas Emerging Markets Index Tracker Fund s8	0.380%
Atlas Ethical Fund s8	0.890%
Atlas Europe (ex UK) Equity Index Tracker Fund s8	0.235%
Atlas Flexible Access Retirement Fund s8	0.480%
Atlas Flexible Pre-Retirement Fund s8	0.284%
Atlas Global Equity Index Tracker Fund s8	0.250%
Atlas Inflation-Linked Annuity Target Fund s8	0.265%
Atlas Japan Equity Index Tracker Fund s8	0.235%
Atlas Level Annuity Target Fund s8	0.265%
Atlas Multi Asset Absolute Return Fund s8	0.940%
Atlas Multi Asset Portfolio 1 s8	0.350%
Atlas Multi Asset Portfolio 2 s8	0.350%
Atlas Multi Asset Portfolio 3 s8	0.350%
Atlas North American Equity Index Tracker Fund s8	0.235%
Atlas Over 15 Years Gilts Index Tracker Fund s8	0.235%
Atlas Over 5 Years Index-Linked Gilts Index Tracker Fund s8	0.235%
Atlas Passive Multi Asset Fund s8	0.395%
Atlas Retirement Income Drawdown Fund s8	0.510%
Atlas Shariah Compliant Fund s8	0.500%
Atlas Sustainable Equity Fund s8	0.440%
Atlas UK Direct Property Fund s8	0.835%
Atlas UK Equity Index Tracker Fund s8	0.235%
Atlas World (ex UK) Equity Index Tracker Fund s8	0.273%

Governance Statement

Employer: Institute of Directors

Atlas Master Trust Series Name	TER
Atlas Active Corporate Bond Fund s9	0.450%
Atlas Active Emerging Markets Equity Fund s9	1.070%
Atlas Active Multi Asset Fund s9	0.440%
Atlas Asia Pacific (ex Japan) Equity Index Tracker Fund s9	0.175%
Atlas Cash Fund s9	0.230%
Atlas Corporate Bond Index Tracker Fund s9	0.175%
Atlas Emerging Markets Index Tracker Fund s9	0.320%
Atlas Ethical Fund s9	0.830%
Atlas Europe (ex UK) Equity Index Tracker Fund s9	0.175%
Atlas Flexible Access Retirement Fund s9	0.420%
Atlas Flexible Pre-Retirement Fund s9	0.224%
Atlas Global Equity Index Tracker Fund s9	0.190%
Atlas Inflation-Linked Annuity Target Fund s9	0.205%
Atlas Japan Equity Index Tracker Fund s9	0.175%
Atlas Level Annuity Target Fund s9	0.205%
Atlas Multi Asset Absolute Return Fund s9	0.860%
Atlas Multi Asset Portfolio 1 s9	0.290%
Atlas Multi Asset Portfolio 2 s9	0.290%
Atlas Multi Asset Portfolio 3 s9	0.290%
Atlas North American Equity Index Tracker Fund s9	0.175%
Atlas Over 15 Years Gilts Index Tracker Fund s9	0.175%
Atlas Over 5 Years Index-Linked Gilts Index Tracker Fund s9	0.175%
Atlas Passive Multi Asset Fund s9	0.335%
Atlas Retirement Income Drawdown Fund s9	0.440%
Atlas Shariah Compliant Fund s9	0.440%
Atlas Sustainable Equity Fund s9	0.380%
Atlas UK Direct Property Fund s9	0.775%
Atlas UK Equity Index Tracker Fund s9	0.175%
Atlas World (ex UK) Equity Index Tracker Fund s9	0.213%

Independent Auditor's Report to the Trustee of the Atlas Master Trust

Opinion

We have audited the Financial Statements of the Atlas Master Trust for the year ended 31 March 2021 which comprise the Fund Account, the Statement of Net Assets and the related notes to the Financial Statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including Financial Reporting Standard 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland (United Kingdom Generally Accepted Accounting Practice).

In our opinion, the financial statements:

- show a true and fair view of the financial transactions of Atlas during the year ended 31 March 2021, and of the amount and disposition at that date of its assets and liabilities, other than liabilities to pay pensions and benefits after the end of the year;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- contain the information specified in Regulation 3A of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, made under the Pensions Act 1995.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) ("ISAs (UK)") and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the Financial Statements section of our report. We are independent of Atlas in accordance with the ethical requirements that are relevant to our audit of the Financial Statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

In auditing the Financial Statements, we have concluded that the Trustee's use of the going concern basis of accounting in the preparation of the Financial Statements is appropriate.

- Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the scheme's ability to continue as a going concern for a period of at least twelve months from when the Financial Statements are authorised for issue.
- Our responsibilities and the responsibilities of the Trustee's with respect to going concern are described in the relevant sections of this report.

Other information

The Trustee is responsible for the other information. The other information comprises the information included in the annual report, other than the Financial Statements and our auditor's report thereon. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the Financial Statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially

Independent Auditor's Report to the Trustee of the Atlas Master Trust

inconsistent with the Financial Statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the Financial Statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Responsibilities of Trustee

As explained more fully in the Statement of Trustee Responsibilities set out on page 33, the Trustee is responsible for the preparation of the Financial Statements, for being satisfied that they give a true and fair view, and for such internal control as the Trustee determines is necessary to enable the preparation of Financial Statements that are free from material misstatement, whether due to fraud or error.

In preparing the Financial Statements, the Trustee is responsible for assessing Atlas's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Trustee either intends to wind up Atlas or has no realistic alternative but to do so.

Auditor's responsibilities for the audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the Financial Statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these Financial Statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud.

We set out below the key areas which, in our opinion the financial statements are susceptible to material misstatement by way of irregularities including fraud and the extent to which our procedures are capable of detecting these.

- Management override of controls. Our audit procedures to respond to these risks included enquiries of management about their own identification and assessment of the risks of irregularities, sample testing on the posting of journals and reviewing accounting estimates for bias.
- Misappropriation of investment assets owned by the Master Trust. This is addressed by obtaining direct confirmation from the investment manager of investments held at the Statement of Net Assets date.

Independent Auditor's Report to the Trustee of the Atlas Master Trust

- Non-receipt of contributions due to the scheme from the employer. This is addressed by testing contributions due are paid to the scheme in accordance with the schedules of contributions agreed between the employers and the Trustee.
- Payment of large transfers out to invalid schemes or members. This is addressed through testing that there is evidence the receiving scheme is valid, the member identity is verified and of the authorisation of the amount and approval of the payment of the transactions.
- Payment of large retirement lump sum benefits to invalid members. This is addressed through sample testing that there is evidence that the member's identity is verified and of the authorisation of the amount and approval of the payment of the transactions.

Owing to the inherent limitations of an audit, there is an unavoidable risk that we may not have detected some material misstatements in the financial statements, even though we have properly planned and performed our audit in accordance with auditing standards. We are not responsible for preventing non-compliance and cannot be expected to detect non-compliance with all laws and regulations.

These inherent limitations are particularly significant in the case of misstatement resulting from fraud as this may involve sophisticated schemes designed to avoid detection, including deliberate failure to record transactions, collusion or the provision of intentional misrepresentations.

A further description of our responsibilities for the audit of the Financial Statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Use of our report

This report is made solely to the Atlas Trustee, as a body, in accordance with Regulation 3 of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, made under the Pensions Act 1995. Our audit work has been undertaken so that we might state to the Atlas Trustee those matters we are required to state to it in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Atlas Trustee as a body, for our audit work, for this report, or for the opinions we have formed.

Crowe U.K. LLP

Crowe U.K. LLP

Statutory Auditor

London

Date: 26 October 2021

Fund Account

For the year ended 31 March 2021

	Notes	Year ended 31 March 2021 £000	Year Ended 31 March 2020 £000
Contributions and benefits			
Employer contributions		106,659	106,959
Employee contributions		16,804	18,712
Total contributions	4	123,463	125,671
Transfers in	5	2,621	4,348
Other income	6	8,151	6,004
		134,235	136,023
Benefits paid or payable	7	(17,142)	(14,040)
Payments to and on account of leavers	8	(41,644)	(54,519)
Administrative expenses	9	(3,096)	(2,678)
		(61,882)	(71,237)
Net additions from dealings with members		72,353	64,786
Returns on investments			
Investment income	10	-	7
Change in market value of investments	11	313,803	(77,329)
Net return on investments		313,803	(77,322)
Net increase/(decrease) in the fund during the year		386,156	(12,536)
Net assets of Atlas at 1 April		980,081	992,617
Net assets of Atlas at 31 March available to members		1,366,237	980,081

The notes on pages 114 to 124 form an integral part of these financial statements.

Statement of changes in Funds

For the year ended 31 March 2021

	Available to Members 31 March 2021 £000	Statutory Reserve 31 March 2021 £000	Total 31 March 2021 £000
Funds at the beginning of the year	980,081	948	981,029
Net increase in funds during the year	386,156	-	386,156
Statutory reserve funding received	-	45	45
Funds at the end of the year	<u>1,366,237</u>	<u>993</u>	<u>1,367,230</u>

The notes on pages 114 to 124 form an integral part of these financial statements.

Statement of Net Assets available for benefits

As at 31 March 2021

	Notes	31 March 2021 £000	31 March 2020 £000
Investment assets			
Pooled investment vehicles	14	1,353,824	968,921
Cash in transit	11	62	73
Total investments		1,353,886	968,994
Current assets	17	15,007	13,744
Current liabilities	18	(2,656)	(2,657)
Net assets of Atlas at end of year available to members		1,366,237	980,081
Funds			
Available to members		1,366,237	980,081
Statutory reserve		993	948
		1,367,230	981,029

The financial statements summarise the transactions of Atlas and deal with the net assets at the disposal of the Trustee. They do not take account of obligations to pay pensions and benefits which fall due after the end of Atlas year.

The notes on pages 114 to 124 form an integral part of these financial statements.

The financial statements set out in pages 114 to 124 were approved on behalf of the Trustee on 26 October 2021.

Director



Director



Notes to the Financial Statements

1. Basis of preparation

The financial statements have been prepared in accordance with the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, Financial Reporting Standard (FRS)102 – The Financial Reporting Standard applicable in the UK and Republic of Ireland issued by the Financial Reporting Council and with guidance set out in the Statement of Recommended Practice “Financial Reports of Pension Schemes” (revised June 2018) (“the SORP”).

The Financial statements have been prepared on the going concern basis. The Trustee has assessed the impact of the COVID-19 pandemic in terms of the predicted effect on the Trust assets. The Trustee has noted that the accounts as at 31 March 2021 were prepared on a going concern basis.

2. Identification of the financial statements

Atlas is established as a trust under English Law. The registered address of the Trust is at Atlas Master Trust Trustee Limited, 65 Gresham Street, London, EC2V 7NQ.

3. Accounting policies

Investments

The change in market value of investments during the year comprises all increases and decreases in market value of investments held at any time during the year, including profits and losses realised on sales of investments during the year.

Pooled investment vehicles have been valued at the latest available single price provided by the pooled investment manager.

Presentation currency

The Atlas’s functional and presentation currency is pounds sterling.

Taxation

Atlas is a registered Pension Scheme under Chapter 2 of Part 4 of the Finance Act 2004 and is therefore exempt from income tax and capital gains tax.

Contributions

Employee contributions, including AVCs, are accounted for by the Trustee when they are deducted from pay by the employers, except for the first contribution due where the employee has been auto-enrolled by the employers in which case it is accounted for when received by Atlas.

Employer normal contributions that are expressed as a rate of salary are accounted for on the same basis as the employee contributions, in accordance with the Payment Schedule in force during the year.

Employer augmentation contributions are accounted for in accordance with the agreement under which they are payable.

Salary Sacrifice contributions are paid by the employers. Contributions are paid on behalf of the members by the employers and are in addition to the normal employer contributions. Members can opt out of this arrangement.

Notes to the Financial Statements

3. Accounting policies (continued)

Benefits and leaver payments

Benefits are accounted for on the later of the period in which the member notifies the Trustee of their decision on the type or amount of benefit to be taken, and the date of retiring or leaving. If there is no member choice, on the date of retiring, leaving or notification of death.

Where the Trustee is required to settle tax liabilities on behalf of a member (such as when lifetime or annual allowances are exceeded) with a consequent reduction in that members benefits receivable from The Trust, this is shown separately within benefits.

Expenses

All direct costs of administration, except for the management charges, including fees payable to Trustee Directors are met by Capita. The expenses are accounted for on an accruals basis.

Transfer values

Transfer values are recognised when the Trustee of the receiving scheme has accepted the liability for the transferring member. In the case of individual transfers, this is usually when received or paid.

Group transfers are accounted for in accordance with the terms of the transfer agreement.

Annuities

Members' retirement annuities are purchased from Insurance Companies to match and fully guarantee the pension obligations of Atlas in respect of that individual. The cost of the annuity is accounted for in the Fund Account for the year in which Atlas's liability is discharged. Such policies are not included in the Financial Statements.

Investment income

Income from cash and short term deposits is accounted for on an accruals basis.

Other income

Income received relating to the management charge is accounted for on an accruals basis.

4. Contributions

	Year ended 31 March 2021 £000	Year ended 31 March 2020 £000
Employer contributions:		
Normal	56,555	57,343
Salary sacrifice	40,224	42,851
Augmentations	413	562
Additional	9,467	6,203
	106,659	106,959
Employee contributions		
Normal	13,733	12,580
AVC	3,071	6,132
	16,804	18,712
	123,463	125,671

Additional contributions relate to salary sacrifice AVCs of £9,453,170 (2020: £6,167,654) and pay in lieu of notice payments of £13,631 (2020: £9,409) employer contributions that members, on leaving the company, have elected to have paid into their retirement fund rather than to them personally it also includes underpaid contributions and backdated contributions of £Nil (2020: £25,708).

Notes to the Financial Statements

4. Contributions (continued)

Augmentations relate to amounts paid by the employers relating to members severance payments.

5. Transfers in

	Year ended 31 March 2021 £000	Year ended 31 March 2020 £000
Group transfers in from other schemes	-	50
Individual transfers in from other schemes	2,621	4,298
	2,621	4,348

6. Other income

	Year ended 31 March 2021 £000	Year ended 31 March 2020 £000
Claim on term Assurance Policies	5,026	3,286
Payment by Capita to balance unit position	29	40
Atlas management charges	3,096	2,678
	8,151	6,004

Administration charges, which vary between employers, are charged by Capita against the value of each pension pot and are payable by the member. Charges are deducted from members' pots by the encashment of units. The charges shown here are those that have been deducted from the members' pots in the year ended 31 March 2021. Some employers may choose to reduce the charge by paying fees direct to Capita which are not included above.

7. Benefits paid or payable

	Year ended 31 March 2021 £000	Year ended 31 March 2020 £000
Lump sums and commutations	2,469	1,504
Purchase of annuities	265	349
Lump sum death benefits	8,316	4,688
Other benefits	5,964	7,464
Taxation where annual allowance exceeded	128	35
	17,142	14,040

Included in other benefits is flexible access drawdown/uncrystallised funds pension lump sum payments of £2,630 (2020: £2,971) and income drawdown payments of £3,334 (2020: £4,493).

Notes to the Financial Statements

8. Payments to and on account of leavers

	Year ended 31 March 2021 £000	Year ended 31 March 2020 £000
Individual transfers out to other schemes	41,644	54,519

9. Administrative expenses

	Year ended 31 March 2021 £000	Year ended 31 March 2020 £000
Administration fees	3,096	2,678

The administration fees of £3.096 million (2020: £2.678 million) relate to the recharge of the management charges, the income from which is included in note 6 and is payable to Capita.

10. Investment income

	Year ended 31 March 2021 £000	Year ended 31 March 2020 £000
Income on cash deposits	-	7

11. Reconciliation of net investments

	Value at 01.04.20 £000	Purchases at cost £000	Sales Proceeds £000	Change in Market Value £000	Value at 31.03.21 £000
Pooled Investment Vehicles	968,921	203,182	(132,082)	313,803	1,353,824
Cash in Transit	73				62
	<u>968,994</u>				<u>1,353,886</u>

Included in the above purchases and sales figures is £75.4 million relating to members individual and life styling switches, the above value also includes AVCs totalling £12.254 million (2020: £10.546 million).

Transaction costs

Indirect costs are incurred through the bid-offer spread on investments within pooled investment vehicles and charges made within those vehicles.

Notes to the Financial Statements

12. Concentration of investments

The following investments accounted for more than 5% of Atlas's net assets:

	31 March 2021		31 March 2020	
	Value	Value	Value	Value
	£000	%	£000	%
Capita Passive Global Equity Fund	273,746	20.0	199,668	20.4
Atlas Multi Asset Portfolio 1	725,893	53.1	488,771	49.9
Atlas Multi Asset Portfolio 3	81,692	6.0	60,808	6.2
Atlas Level Annuity Target	61,698	4.5	52,533	5.4

13. Investment allocation

Investments purchased by Atlas are allocated to provide benefits to the individuals on whose behalf corresponding contributions are paid. The investment manager holds the investment units on a pooled basis for the Trustee. The Atlas administrator allocates investment units to members. The Trustee may hold investment units representing the value of employer contributions that have been retained by Atlas that relate to members leaving Atlas prior to vesting.

Investments are allocated to members and the Trustee as follows:

	31 March 2021 £000	31 March 2020 £000
Members	1,353,824	968,921
Trustee	-	-
	1,353,824	968,921

14. Pooled investment vehicles

Atlas's investments in pooled investment vehicles at the year end comprised:

	31 March 2021 £000	31 March 2020 £000
Multi Asset*	868,831	599,476
Bonds	75,864	66,297
Equities	370,243	267,608
Cash	35,184	31,436
Property	3,702	4,104
	1,353,824	968,921

* Invest in a range of different asset classes including bonds, equities, fixed interest, cash and property.

Notes to the Financial Statements

15. Fair value determination

The fair value of financial instruments has been disclosed using the following fair value hierarchy:

Level 1	The unadjusted quoted price in an active market for identical assets or liabilities that the entity can access at the assessment dates.
Level 2	Inputs other than quoted prices included within Level 1 which are observable (i.e. developed) for the asset or liability, either directly or indirectly.
Level 3	Inputs are unobservable (i.e. for which market data is unavailable) for the asset or liability.

A fair value measurement is categorised in its entirety on the basis of the lowest level input which is significant to the fair value measurement in its entirety.

Atlas's investment assets and liabilities fall within the above hierarchy levels as follows:

As at 31 March 2021	Level 1 £000	Level 2 £000	Level 3 £000	Total £000
Pooled investment vehicles	-	1,350,122	3,702	1,353,824
Cash in transit	62	-	-	62
Total	62	1,350,122	3,702	1,353,886

As at 31 March 2020	Level 1 £000	Level 2 £000	Level 3 £000	Total £000
Pooled investment vehicles	-	964,817	4,104	968,921
Cash in transit	73	-	-	73
Total	73	964,817	4,104	968,994

16. Investment risk disclosures

FRS 102 requires the disclosure of information in relation to certain investment risks. These risks are set out by FRS 102 as follows:

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

Market risk: the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk comprises three types of risk: currency risk, interest rate risk and other price risk.

- **Currency risk:** the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in foreign exchange rates.
- **Interest rate risk:** the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates.
- **Other price risk:** the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices (other than those arising from interest rate risk or currency risk), whether those changes are caused by factors specific to the financial instrument or its issuer, or factors affecting all similar financial instruments traded in the market.

Notes to the Financial Statements

16. Investment risk disclosures (continued)

The Trustee determines their investment strategy after taking advice from a professional investment adviser. The Trust has exposure to these risks because of the investments it makes in following the investment strategy set out below. The Trustee manages investment risks, including credit risk and market risk, within agreed risk limits which are set taking into account the Trust's strategic investment objectives. These investment objectives and risk limits are implemented through the investment management agreements in place with the Trust's investment managers and monitored by the Trustee by regular reviews of the investment portfolio.

Further information on the Trustee's approach to risk management, credit and market risk is set out below. This does not include the legacy insurance policies nor AVC investments as these are not considered significant in relation to the overall investments of the trust.

Investment strategy

The Trustee's objective is to make available to members of the Trust an appropriate range of investment options designed to generate income and capital growth, which together with new contributions from members and their employer, will provide a retirement amount with which the member can purchase a pension annuity (or other type of retirement product). The Statement of Investment Principles (SIP) outlines the investment objectives and strategy for the Defined Contribution assets of the Trust.

The investment funds offered to members are white label funds provided by Scottish Widows. These are funds specifically created for this Trust which are invested in other funds available through Scottish Widows Company's platform but with more beneficial pricing arrangements. Five such funds are available as follows:

- a. Multi Asset
- b. Bonds
- c. Equities
- d. Cash
- e. Property

The Trustee has an investment management agreement in place with Scottish Widows that sets out guidelines for the underlying investments held by the funds. The day to day management of the underlying investments of the funds is the responsibility of Scottish Widows, including the direct management of credit and market risks.

The Trustee monitors the underlying risks by quarterly investment reviews with Scottish Widows.

The risks disclosed here relate to the DC Section's investments as a whole. Members are able to choose their own investments from a range of funds offered by the Trustee and therefore may face a different profile of risks from their individual choices compared with the Section as a whole.

Notes to the Financial Statements

16. Investment risk disclosures (continued)

The funds which have exposure to these risks are set out below:

	Fair Value Hierarchy	Indirect Credit Risk	Currency	Interest rate	Other price	2021 Value £000	2020 Value £000
Pooled Investment Vehicles:							
- Atlas Multi Asset Portfolio 1	2	Y	Y	Y	Y	725,893	488,771
- Capita Passive Global Equity	2	N	Y	N	Y	273,746	199,668
- Atlas Multi Asset Portfolio 3	2	Y	Y	Y	Y	81,692	60,808
- Atlas Level Annuity Target	2	Y	N	Y	N	61,698	52,533
- Atlas Multi Asset Portfolio 2	2	Y	Y	Y	Y	50,995	41,269
- Atlas Cash	2	Y	N	Y	N	35,184	31,436
- Atlas UK Equity Index Tracker	2	N	N	N	Y	23,980	19,153
- Atlas North America Equity Index Tracker	2	N	Y	N	Y	17,141	12,114
- Capita Active Global Equity	2	N	Y	N	Y	16,332	11,312
- Atlas World (excluding UK) Equity Index Tracker	2	N	Y	N	Y	8,695	5,481
- Atlas Shariah Compliant Fund	2	N	Y	N	Y	7,314	3,547
- Atlas Europe (ex UK) Equity Index Tracker	2	N	Y	N	Y	7,259	5,571
- Atlas Japan Equity Index Tracker	2	N	Y	N	Y	5,236	4,266
- Atlas Active Corporate Bond	2	Y	N	Y	N	4,773	4,327
- Atlas Asia Pacific (ex Japan) Equity Tracker	2	N	Y	N	Y	4,236	2,621
- Atlas Active Multi Asset	2	Y	Y	Y	Y	4,150	3,048
- Atlas UK Direct Property	3	N	N	N	Y	3,702	4,104
- Atlas Active Emerging Markets Equities	2	N	Y	N	Y	3,467	2,304
- Atlas Corporate Bond Index Tracker	2	Y	N	Y	N	3,306	3,141
- Atlas Over 15 Years Gilts Index Tracker	2	Y	N	Y	N	3,254	3,540
- Atlas Over 5 Years Index-Linked Gilts Index Tracker	2	Y	N	Y	N	2,832	2,755
- Atlas Flexible Pre-Retirement	2	Y	Y	Y	Y	2,686	2,335
- Atlas Multi Asset Absolute Return	2	Y	Y	Y	Y	2,470	2,508
- Atlas Global Equity Index Tracker	2	N	Y	N	Y	2,120	1,377
- Atlas Passive Multi Asset Fund	2	Y	Y	Y	Y	883	708
- Atlas Emerging Markets Equity Index Tracker	2	N	Y	N	Y	444	157
- Atlas Sustainable Equity Fund	2	N	Y	N	Y	262	N/A
- Atlas Retirement Income Drawdown Fund	2	Y	Y	Y	Y	35	30
- Atlas Flexible Access Retirement Fund	2	Y	Y	Y	Y	29	30
- Atlas Ethical	2	N	N	N	Y	9	7
- Atlas Inflation-Linked Annuity Target Fund	2	Y	N	Y	Y	1	N/A
Total						1,353,824	968,921

Source: Scottish Widows.

Note: Only a portion of the funds may be exposed to the risks shown.

Notes to the Financial Statements

16. Investment risk disclosures (continued)

Credit risk

Atlas invests through an investment platform (Scottish Widows) which provides access to a significant range of funds covering all asset classes and multiple funds and managers.

Scottish Widows is a PRA and FCA regulated business which requires it to have suitable controls, systems and processes in place. These include systems and processes for accepting funds and fund managers onto the platform and for ongoing monitoring of those funds and fund managers. These complement work done by Atlas' investment consultants which includes monitoring performance of the selected managers against agreed benchmarks, and stock-lending activities (where credit risk can manifest) of underlying fund managers to ensure that the level of this activity remains within acceptable parameters.

The funds available to members – whether a default fund or one selected by members – have different risks according to the asset class and split, fund objectives, geographic location and political risk. The risks associated with each available fund are outlined in the Investment Guides and more detailed information can be found in the Fund Factsheets, available on-line.

Indirect credit risk arises in relation to underlying investments held in the bond pooled investment vehicle and cash funds. This was the position at the year-end and the prior year.

Atlas is also subject to indirect credit and market risk arising from the underlying investments held in the Scottish Widows funds.

The Scheme is subject to direct credit risk through its holding in unit linked insurance funds provided by Scottish Widows.

17. Current assets

	31 March 2021 £000	31 March 2020 £000
Contributions due:		
Employer normal	8,496	8,130
Employee normal	1,148	1,890
Cash balances - designated to members	4,942	2,931
- undesignated to members	58	39
DIS Insurance	-	517
Other	363	237
	15,007	13,744

Contributions due from the employers were received subsequent to the year end within the timescales set out in the payment schedules.

18. Current liabilities

	31 March 2021 £000	31 March 2020 £000
Accrued expenses due to Capita	363	237
Accrued benefits	2,207	2,318
Income tax payable	74	95
Contributions owed back to Employer	12	7
	2,656	2,657

Notes to the Financial Statements

19. Employer-related investments

During the year and the prior period there were no employer-related investments.

20. Related party transactions

During the year £163,562 (2020: £157,885) was paid to the Independent Trustee Directors by Capita.

The administration fees amounting to £3.096 million (2020: £2.678 million) mentioned in note 9 are payable to Capita.

21. Unitisation

The allocation by value of units to participating employers at 31 March is shown in the statement below:

	31 March 2021 £000	31 March 2020 £000
Affinity Workforce (formally CER Staffing Solutions)	2,241	1,573
Apex Financial Services Limited	5,454	3,671
Capita PLC	1,154,422	837,305
City HealthCare Partnership	15,439	8,829
Decumulation	671	405
Education Software Solutions (formally ESS)	128	-
Evergreen Garden Care (formally the Scotts Company)	4,593	2,603
Fortius Group (formally Supplier Assessment Services)	916	384
HP Inc	60,078	41,350
Link Group	31,963	19,949
Nidec	27,212	18,816
Nifco UK Ltd	4,317	2,450
Parking Eye	1,572	700
Right Digital Solutions	1,157	-
Social Care Institute of Excellence	15	-
Vertiv (formally Emerson)	32,469	22,479
Westrock	11,311	8,404
	1,353,958	968,918

22. Statutory reserve

The statutory reserve is the amount that was set aside by Atlas' Funder (Capita Pension Solutions) that the Trustee is entitled to draw upon to maintain operations should a Triggering Event arise. A Triggering Event is one of the series of legislatively prescribed situations that could require Atlas to stop operating and wind-up. Due to the changes in the Master Trusts regarding the Pensions Regulator (TPR) Code of Practice 15.

The increase in the statutory reserve during the year to £993k is as a result of calculations in relation to the final authorisation of the Trust by TPR.

The Trustee has considered the value of the reserve in light of the COVID-19 pandemic and believe it remains at an appropriate level, however it is currently in discussions with TPR with regards to a BAU increase. Unlike most Master Trusts, Atlas continued to be financially sustainable despite the asset falls in the prior year.

Notes to the Financial Statements

23. Subsequent events

There were no subsequent events to report in the financial year ended 31 March 2021.

24. COVID-19

The outbreak of the Novel Coronavirus (COVID-19), declared by the World Health Organisation as a global health emergency on the 30 January 2020, has caused disruption to businesses and economic activity which has been reflected in fluctuations in global stock markets. The Trustee continues to monitor developments relating to COVID-19.

25. Contingent liabilities

There were no contingent liabilities to report in the financial year ended 31 March 2021.