

## 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.

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 (CPSL)

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

## Performance evaluation

As with all service providers, CPSL 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.
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 <sup>st</sup> July each year.
Collating and reporting data on stock lending activity for core funds (see definition above).	By 31 <sup>st</sup> 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;
- 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, CPSL 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, or 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.

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;
- 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.
- 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

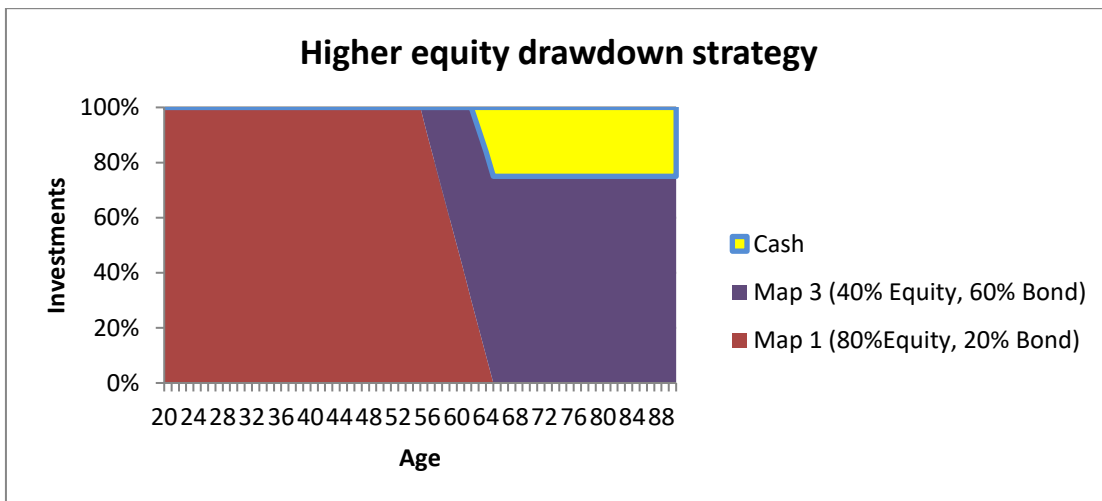
- Welcome policy initiatives that contribute towards achieving the 1.5°C target;

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

## 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.



- 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 1 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.
- 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 2.

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.

## 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 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.

## **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 behaviors 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 2/3<sup>rd</sup> in SMFA and 1/3<sup>rd</sup> 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 Principles for Responsible Investing (PRI). PRI is the world's leading proponent of responsible investment – see <https://www.unpri.org>. 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.

## **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.

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 term 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 2.

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.

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**



## Appendix 1 – 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%

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%
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%

## 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%

## 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%

## 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%

### 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%

## 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%

## 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%

## 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%

## Appendix 2 – 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	<b>Strategic Allocation</b>	<b>Permitted Ranges</b>	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%)		
Multi Asset	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	60.00% MSCI, ACWI, NDR, TL – 50% hedged / unhedged to GNP	<b>Strategic Allocation</b>	<b>Permitted Ranges</b>	6 December 2017
				Global Equites (unhedged) (30%)		

	other alternatives both in the UK and overseas. This Fund has a middle level of risk compared to the other multi asset portfolios.	20.00% BGAT hedged to GBP 20% BGAC hedged to GMP	Global Equites (hedged) (30%) Global Sovereign Bonds (20%) Global Corporate Bonds (20%) Cash (0%)	40 – 75% 20 – 50% 0% - 20%	
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	<b>Strategic Allocation</b> Global Equites (unhedged) (20%) Global Equites (hedged) (20%) Global Sovereign Bonds (30%) Global Corporate Bonds (30%) Cash (0%)	<b>Permitted Ranges</b> 25 – 55% 40 – 70% 0% - 20%	6 December 2017
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	100.00% SONIA (6m) +5% p.a.	50% Nordea GBP Diversified Return Fund 50% Invesco Global Target Return Fund		12 February 2019

		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.			
	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
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.	<p>45.00% FTSE All Share Index</p> <p>15.75% FTSE North American Index</p>	<p>45.00% LGIM UK Equity Index</p> <p>15.75% LGIM North America Equity Index</p> <p>15.75% LGIM Europe ex UK Equity Index</p> <p>7.88% LGIM Japan Equity Index</p> <p>5.62% LGIM Asia Pacific (ex Japan) Developed Equity Index</p>	31 July 2015

			<p>15.75% FTSE Europe (ex UK) Index</p> <p>7.88% FTSE Japan Index</p> <p>5.62% FTSE Asia Pacific (ex-Japan) Index</p> <p>10.00% FTSE All-World Emerging Index</p>	10.00% LGIM World Emerging Markets Equity Index	
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	
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	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	



Japan) Equity Index Tracker					
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	
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	
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	10% Schroder UK Specialist Value Equity Fund 10% Baille Gifford UK Equity Focus Fund 19% BlackRock US Equity Index Fund	19 October 2016	

			<p>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</p>	<p>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</p>	
Capita Passive Global Equity	The investment objective of the Fund is to track the performance of the benchmark	<p>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</p>	<p>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</p>	19 October 2016	

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
Cash	Atlas Cash	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.  Every effort is made to invest in a way which preserves the value of your investment. However, the value of this	100.00% ABI Money Market Sector Average	100.00% BlackRock Institutional Sterling Liquidity	31 July 2015

		Fund can go down as well as up and your investment is not guaranteed.			
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
	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.	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	31 July 2015

		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>15.00% LGIM Over 5yr Index-Linked Gilts Index</p> <p>15.00% LGIM Over 15 Year Gilts Index</p> <p>17.50% LGIM UK Equity Index</p> <p>6.13% LGIM North America Equity Index</p> <p>6.13% LGIM Europe ex UK Equity Index</p> <p>3.06% LGIM Japan Equity Index</p> <p>2.18% LGIM Asia Pacific (ex-Japan) Developed Equity Index</p>	
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
	Atlas Retirement Income Drawdown	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.	100.00% Bank of England Base Rate +3.5% p.a.	100.00% LGIM Retirement Income Multi Asset	31 July 2015

		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.			
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	100.00% AREF/IPD All Balanced	50.00% LGIM Managed Property Fund	31 July 2015

		aim to beat the benchmark return over longer periods.	Property Fund Index	50.00% Threadneedle Pooled Pension Funds Property Fund	
--	--	---	---------------------	--	--