



cushon

Cushon Master Trust

Governance Statement
Year Ending 31 December 2022

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Cushon Master Trust (formerly the Salvus Master Trust) Governance Statement Year Ending 31st December 2022

Introduction

This is the annual statement ("the Statement") from the Trustees regarding the governance of the Cushon Master Trust ("the Scheme") to demonstrate how the Scheme has complied with the required governance standards. The Trustees have prepared the Statement in accordance with the requirements of the Occupational Pension Schemes (Scheme Administration) Regulation 2016. A copy of the Statement will be added to the Cushon Master Trust website <https://www.cushon.co.uk/info/terms>

The Statement relates to the calendar year 1 January 2022 to 31 December 2022. The Statement includes details of developments after this time where the Trustees feel they will help in describing the ongoing governance of the Scheme.

The Trustees of the Scheme during the year were:-

- Abundzu Limited (represented by Barry Parr);
- Capital Cranfield Pension Trustees Limited (represented by Andrew Warwick-Thompson, changing to Paul Watson effective from 30 June 2023);
- Independent Trustee Services Limited (represented by Dianne Day); and
- Ross Trustees Services Limited (Chair) (represented by Roger Mattingly).

The Scheme is an authorised Defined Contribution master trust, sponsored by Cushon MT Limited.

The Trustees are legally required to act in your interests and are committed to ensuring that the Scheme meets high standards. In the reporting period and after this, there have been some significant developments.

The Trustees meet formally, at least four times a year with meetings that cover:

- Investments - providing you with secure, appropriate and effective investments for your savings;
- Administration - the administration of the Scheme, including the collection, recording and investing of contributions, accounting and the payment of benefits;
- Accounting & legal – to ensure independent verification of the principal internal controls and financial statements, and;
- Risk and Governance - making sure that the Scheme is properly run, compliant with legislation and that no unnecessary risks are taken with your savings.

We believe that this structure enables the Trustees to distribute their workload effectively and to maintain the efficient running of the Scheme as it expands.

Additional Trustee meetings, either in person or by conference call and/or video-link, are organised as the need arises. During the Scheme year the Trustee Board held 4 formal quarterly meetings on the following dates:-

- 8 March 2022
- 8 June 2022
- 8 September 2022
- 6 December 2022

During the year, due to increasing workloads, interim Trustee meetings were introduced to the Scheme meeting structure.

In addition to the formal quarterly Trustee meetings, a further 50 meetings of the Trustees were held, covering the following topics:-

- Administration
- Audit
- Communication & marketing
- Investment
- Legal
- Risk & Governance
- Scheme Management
- Technology
- The Pensions Regulator supervision

The Trustee meetings throughout the year were held both in person and via video conferencing.

Since the end of the Scheme year, the Trustees have continued to meet regularly.

Significant developments

Scheme Growth

The number of members has increased over the year from 91,870 at the start of the year to 100,911 at the end of the year.

As well as the Scheme membership increasing, the assets of the Scheme have increased significantly over the year. This is through a combination of regular monthly contributions; individual transfers-in by members seeking to consolidate their pensions savings in a well-managed, low-cost Scheme; and increases in investment market values. The total assets under management increased slightly from £384.3m to £390.1m by the end of the Scheme year.

Cushon Technology

During the year work commenced on migrating Salvus members to the Cushon technology. This has allowed some of these members to manage their pension on the Cushon App, where members are able to see their retirement savings in real-time, monitor the value of their pension pots and plan for when they need to use them. The Cushon App enables members to take control of their money, make changes to their targets, contributions, transfer in other pensions, all in real-time and on the go.

The plan is for the remaining Salvus members to be migrated to the Cushon technology in 2023. All affected members will be provided with the necessary information to enable them to access and benefit from this technology. Members will be contacted, as appropriate, throughout the year with the relevant information.

Investment Platform closure

The Trustees had previously decided to move from the Aegon investment platform to the Mobius Life investment platform. However, a small number of members had remained on the Aegon platform. During the year all remaining members were moved to the Mobius Life investment platform, with the Aegon investment platform formally closing in October 2022. All members were notified of this move, providing all required information.

Scheme Investment Review

During the year the Trustees completed a Scheme investment strategy review. This resulted in the Trustees making decisions on a new Scheme default investment strategy and making changes to the self-select range available to members. Further details on the Scheme investment strategy review and the impact to the Scheme default investment strategy and self-select range is included in page 6.

Ukraine War

The Trustees discussed with their investment adviser how the war would impact the Scheme investments and engaged within the investment fund managers to understand the Scheme exposure to Russian assets, which was considered minor. In line with normal governance protocols the Trustees continue to monitor Scheme investments on an ongoing basis.

Pension Transfers

The COVID-19 pandemic heightened the risk of pension scams. The Trustees reviewed, with the Scheme Administrator and the Legal Adviser, the steps that need to be taken to help members to identify pension scams in line with new transfer legislation.

This legislation aims to better protect members and introduced new due diligence measures, a warning system of red and amber flags for high risk transfers and also the offer to arrange a MoneyHelper session. In some cases, members will not have a statutory right to a transfer and in others, the Trustees will have to conduct further due diligence before authorising the transfer.

Most pension transfers are legitimate and can proceed with minimum intervention. However, these new regulations place responsibility on the Trustees to ensure compliance and includes a reporting requirement on all suspected scams to Action Fraud.

The Trustees reviewed their transfer processes throughout the year.

Stronger nudges

New Regulations have come into force from 1 June 2022 which means we must provide members with a stronger nudge to Pension Wise guidance when members decide to access their pension savings. We are required to refer members to Pension Wise guidance and explain the nature and purpose of this guidance.

The Pension Wise service offers free and impartial guidance on the options for accessing defined contribution (DC) pension savings.

The Pensions Regulator (TPR) Authorisation

The Trustees have continued to undertake all necessary tasks and reporting to maintain our status as an authorised DC master trust. This requires us to regularly provide Scheme governance and Significant Event reporting to the Pensions Regulator.

Scheme Investments

Investment Strategy Review

The initial investment strategy review, carried out during 2021, had the aim of offering one Scheme default investment strategy with the plan of consolidating the Scheme investment default strategies and moving existing members from their current default to a new default investment strategy. This work continued into 2022.

The Trustees know that members have different attitudes to risk and different aims for their retirement savings. When setting the investment strategy, the Trustees consider various aspects including:

- The demographics of the Scheme membership;
- The average and range of members' pot sizes;
- Costs;
- Likely benefit choice at retirement;
- The different type of investments available and their risk profile;
- Current and future market outlook;
- Investment horizon;
- Realisation of investments; and
- Environmental, Social and Governance (ESG) factors, including climate change.

The Trustees Statement of Investment Principles (SIP) details the Trustees investment policy and includes their investment beliefs (aims and objectives). These investment beliefs are considered when developing the investment strategy to ensure that all decisions are consistent with these beliefs and are made in the interests of members. They also form part of the investment governance reporting framework, which is used to monitor effective implementation and management of the investment funds on behalf of members.

Broadly, the Trustees investment objective in respect of the default investment strategy is to maximise risk and inflation adjusted returns for members regardless, of when they take their benefits.

The Trustees believe that responsible, sustainable, and social impact investment opportunities can contribute to meeting their investment objectives. Further detail on the Trustees Responsible Investing Policy, including the Trustees investment beliefs, can be found at <https://www.cushon.co.uk/info/terms>. This Policy was reviewed throughout the year, with the last review being completed on 9 June 2023. This policy is subject to ongoing review.

Having taken investment advice from Isio, the Trustees met with a variety of investment managers, and have agreed to introduce a new default investment strategy, the Cushon Sustainable Investment Strategy. All members were contacted to provide them within information on the new default investment strategy, notice of when the move would take place and where further information could be obtained.

The Trustees formally approved the introduction of the Cushon Sustainable Investment Strategy at a Trustees' meeting held on 15 September 2021. Further work on the overall strategy, including the de-risking options was carried forward and approved at the Trustee meeting held on 1 December 2021.

Default Investment Strategies

During the 2022 Scheme year the following default investment strategies were in place:-

1. Salvus Cautious and Balanced Lifestyle
2. Ascot Lloyd Pension Trust
3. Spinnaker Master Trust
4. Mapped Investment funds
5. Cushon Flexible Retirement
6. Cushon Sustainable Investment Strategy

However, by year end only one default investment strategy remained – the Cushon Sustainable Investment Strategy.

A default investment strategy is designed to suit the needs of most members. Members who do not select their own investments will automatically be invested in the default investment strategy. At the end of 2022 approximately 99% of auto-enrolled members had their contributions invested in the default investment strategy.

Default investment strategies get a lot of care and attention because the Trustees have a legal obligation to ensure that the default investment strategy stays appropriate for the majority of members. The Trustees set the overall investment objectives and decide on the investment mix, after taking professional advice. They design a strategy that's suitable for the membership as a whole and review its performance regularly.

The Trustees regularly review how the default investment strategy is performing and can confirm that this is consistent with their aims and objectives detailed within their Statement of Investment Principles (SIP) and that the aims and objectives currently remain suitable for the relevant members.

The investment performance of the default investment strategy is reviewed by the Trustees at each formal quarterly Trustee meeting (dated 8 March, 8 June, 8 September and 6 December 2022). In addition, 11 further investment meetings of the Trustee Board took place during 2022, at which the Scheme investments including the default investment strategies and self-select offerings were discussed.

Cushon Sustainable Investment Strategy

At year end, the Cushon Sustainable Investment Strategy was the only Scheme default investment strategy. Investments in the default investment strategy are managed right through to members target retirement age. Target retirement age can be set through the Cushon App or via the Member Portal. If a target age is not selected, it will default to 65.

The Cushon Sustainable Investment Strategy aims to make a positive impact on our climate and society, as well as members likely retirement outcomes. The Cushon Sustainable Investment Strategy will hold a well-diversified blend of investments, including:

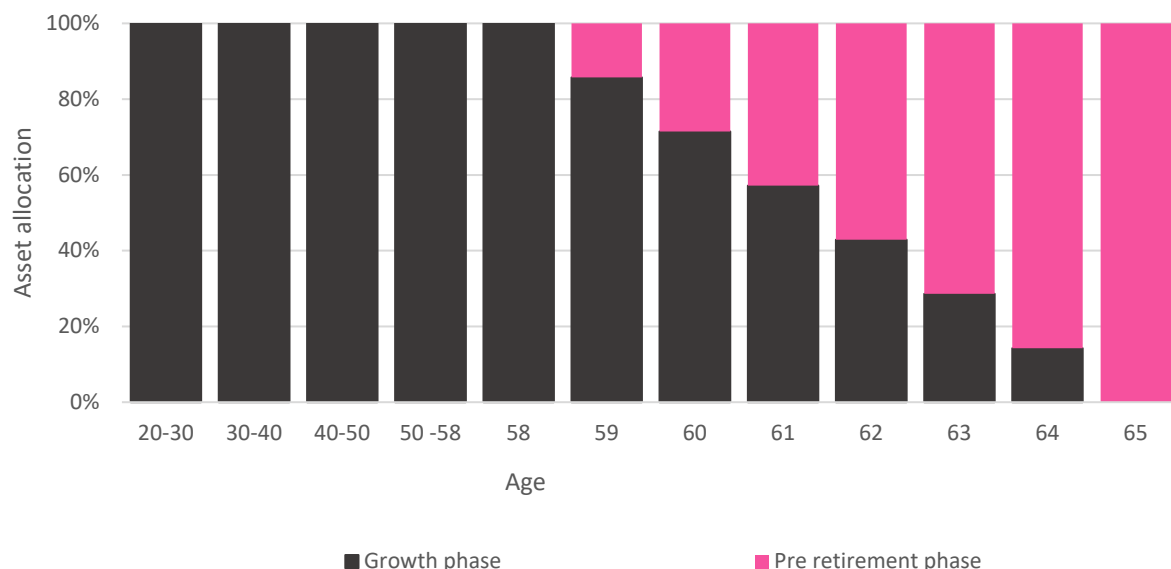
- A unique mix of shares in over 700 companies across the world aligned to the UN Sustainable Development Goals;
- Bonds issued by companies with a low carbon footprint with a focus on climate and social impacts; and
- Climate-aware companies with operations such as wind and solar farms, battery tech, green hydrogen, climate insurance and social housing.

How the Cushon Sustainable Investment Strategy works

The Cushon Sustainable Investment Strategy aims to grow savings in the early years (this is called the growth phase) and then helps protect savings from the risk of short-term investment falls as members approach their target retirement age (this is called the pre-retirement phase).

The chart below reflects how investments change as members get to within 7 years of their target retirement age, assuming they have chosen to retire at age 65. If members have chosen a different target retirement age, then their investments will start changing from a different age. For instance, if a member has chosen a target retirement age of 67, their investments will start to move out of the growth phase and into the pre-retirement phase from age 60 which is 7 years before their 67th birthday.

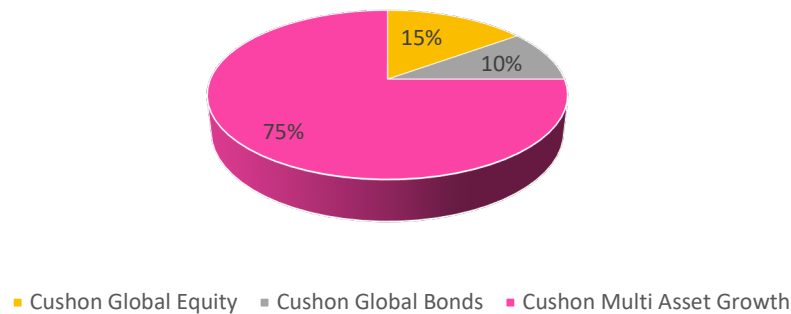
Growth phase



In the early years of the default investment strategy, members are invested in a well-diversified mix of global equities, private markets and bonds, designed to provide the member with long-term growth potential. To keep costs low, the global equity investments are in tracker funds. These investments aim to produce returns broadly in line with the markets they track. The private market and bond investments are held in actively managed funds. These funds aim to outperform markets and inflation.

When making investment decisions, the Trustees consider how these will impact people, society and the environment as well as potential financial performance. This is called responsible investing and is a core element of the Cushon Sustainable Investment strategy. Investment managers have been selected who support the Trustees' Policy in this area.

Growth phase fund mix:



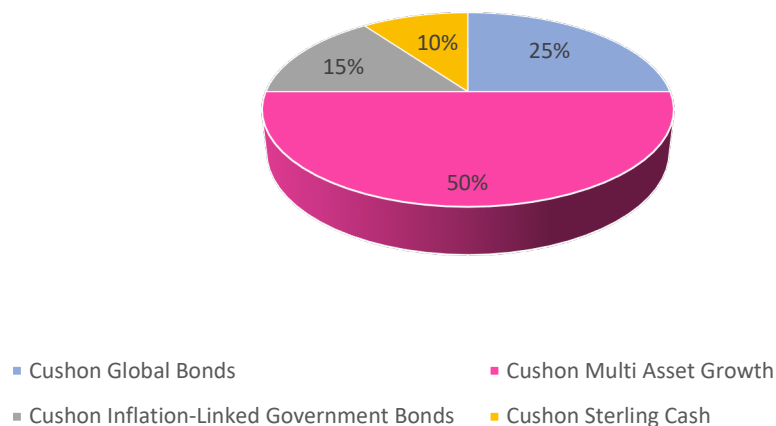
Pre-retirement phase

As members approach their target retirement age, they are gradually moved into investments generally considered to be lower risk. Global bonds and cash investments are gradually added to the fund mix. This process happens automatically and gradually over a 7-year period until members reach their target retirement age.

At retirement

When members reach their target retirement age, they will be invested in a well-diversified mix of global equities, private markets, bonds and cash. This is a more cautious asset mix that also aims to provide continued modest growth, so that members can decide how to take their benefits when they are ready.

Retirement phase fund mix:



Return on Investments

The Department for Work and Pensions (DWP) published guidance for trustees of occupational defined contribution (DC) pension schemes which came into effect on 1 October 2021. The publication sets out the requirement for trustees to calculate and state the return on investments from their default and self-select funds, net of transaction costs and charges. This information must be recorded in the annual Chair's Statement from the first scheme year ending after 1 October 2021 and published on a publicly accessible website.

The Scheme return on investment information has been prepared with regard to the statutory guidance issued by the DWP, where the data is available. Where the data has not been available this has been indicated. Longer term performance information has been unavailable, due to the inception date of the fund's launch on the Mobius Life investment platform and the introduction of the new default investment strategy. In addition, some fund managers have been unable to provide the required information within the stated timescales, despite our best efforts.

For members who have access to the Cushon App, the actual investment return relevant to their own personal circumstances is detailed here.

The net investment returns for the Cushon Sustainable Investment Strategy are detailed within Appendix 2.

In addition, a detailed breakdown of the net return on investments for all the legacy default investment strategies that were in place during the Scheme year is contained within Appendices 5 to 9.

It should be noted that charges vary based on the commercial terms agreed with employers, specific information is detailed within the Member Portal (<https://members.hsadmin.com/Account/Login>) and the Cushon App.



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code to
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Cushon app**

Self-Select funds

Although over 99% of members are invested in a default investment strategy, it is important to review the performance of the self-select funds that are available. Most of these funds are passively managed index-trackers. However, some are actively managed funds meaning they are typically invested in markets that have the potential to reward specialist research capabilities or specific skills of the investment manager. These characteristics tend to increase the cost of investing in these funds; however, they do have the potential to outperform the market and provide enhanced returns. Further details of the self-select funds can be found on the Cushon App. They are also available via help@cushon.co.uk

The Trustees completed a review of the self-select offering during the Scheme year to streamline the funds available. During the year the Trustees contacted all affected members to notify them of the changes to the self-select range. Members were given the opportunity to transfer to alternative funds within the self-select range and if no selection was made the Trustees transferred the self-select investment to the Scheme default investment strategy – the Cushon Sustainable Investment Strategy.

The Trustees will continue to review the self-select offering on an ongoing basis, however, members who select their own investments should also continue to monitor their investment selections to ensure they remain suitable.

The net investment returns for the current self-select funds are detailed within Appendix 3.

A detailed breakdown of the net return on investments for all legacy self-select funds that were in place during the Scheme year is contained within Appendix 10.

Retirement Bridge

Retirement Bridge is a way of enabling members from the age of 55 to remain invested in the Scheme, while taking some or all of their tax-free cash and then, if they wish, drawing down an income from the remainder of their pensions savings. This feature enables members to take full advantage of pension freedoms. There are very few members who use this facility at present but, regardless, the Trustees have a duty to monitor these funds.

When a member chooses Retirement Bridge the pension fund is invested in target-dated funds managed by Alliance Bernstein. These invest the member's pot in a fund that corresponds to their date of birth or a stated target retirement date range of 2 years. The funds are made up of a collection of growth assets, such as equities, and income-producing assets, such as fixed income gilts, whose mix is adjusted as the member approaches age 75.

The objective of the strategy is to produce a sustainable income at a level similar to that of a typical joint-life, level annuity, but one that is expected to grow over time. The reward of an increasing income in retirement does, however, come with some level of risk. Alliance Bernstein constantly monitors the risk profile of the funds and prudently manages the income that is paid out with a pay-out percentage rate set each year. The drawdown rate is not guaranteed to increase each year, but they aim to maintain the drawdown rate between a range of 90% and 102.5% of the annuity benchmark rate.

Now that the default investment strategy and self-select review has been completed, the Trustees will begin work on a review of the retirement offering within the Scheme. The Trustees investment adviser, Isio, have confirmed that the Retirement Bridge continues to be a suitable investment. They are also considering the wider retirement offering available directly from the Scheme, so that members will be able to access all retirement offerings directly from the Scheme. This review will take place throughout 2023 and affected members will be contacted, as appropriate.

Retirement Bridge is a Scheme self-select investment.

The net investment returns for the Retirement Bridge funds are detailed within Appendix 4.

Statement of Investment Principles (SIP)

The SIP details the current investment strategy and was reviewed once during the Scheme Year to take account of the new Scheme default strategy and the revisions to the self-select options available. This revision to the SIP took place on 27 September 2022. A subsequent review took place on 9 June 2022 and this is available on the Cushon website (<https://www.cushon.co.uk/info/terms>) and is included in this statement as Appendix 1.

Investment Governance

As well as reviewing the investment strategies, an important aspect of the Trustees governance of the Scheme is to receive and consider reports on the investment performance of the funds held. Isio provides the Trustees with investment reports on a quarterly basis for all Scheme investments.

The reports received from Isio include performance test information which checks whether passive funds are tracking their benchmark effectively and whether active funds are adding value over and above their benchmark, after investment charges have been deducted. These reports have recently been reviewed to ensure that the information provided is sufficient to meet the needs of the Trustees and allows them to monitor Scheme investment performance effectively.

Conclusion

During 2022, the Trustees completed a consolidation exercise of all default investment strategies into one Scheme default investment strategy, the Cushon Sustainable Investment Strategy. This default investment strategy is designed to meet the needs of most members and is in line with the Trustees' stated investment beliefs (aims and objectives).

The Trustees monitor the ongoing suitability of the investment default strategy on a regular basis to ensure the ongoing suitability for the membership.

For those members who prefer to make their own investment selections, an appropriate fund range has been made available and again an investment review and consolidation exercise was completed during 2022.

The Trustees are satisfied that the investment offering available to members, both from the default investment strategy and the self-select range, is suitable and will meet the needs of the majority of members.

To further develop and strengthen the options available from the Scheme, work on the retirement options available to members will be reviewed and further developed throughout 2023. Pension Access has been launched early in 2023, allowing members to partially withdraw monies from their pension via the Cushon App. Further detail is available on the Cushon App or via help@cushon.co.uk and full details will be documented within future Chair's Statements.

Charges and Transaction Costs

An important aspect of assessing value is to consider the costs incurred by members of the Scheme. The costs associated with saving for retirement via a pension scheme are a combination of clear, published, charges and more opaque 'transaction' costs that are not as easy to identify. The sum of these costs can have a significant impact on a member's pension savings over the long term. Trustees are obliged to obtain and publish this information; they also benchmark these costs and charges against similar member/employer cohorts as part of their assessment of value for members.

The charges borne by members within the Scheme are comprised of three elements:

- Member charges, which includes the Annual Management Charge (AMC) and depends on which fund(s) are used and the fees negotiated by your employer;
 - The AMC is made up of the Cushon platform charge and the fund manager charge;
- Additional expenses of investing in a particular fund;
 - The Total Expense Ratio (TER) is the total cost associated with managing and operating an investment fund, i.e.: AMC plus additional expenses.
- Transaction charges incurred when contributions are invested and members' pots divested. These charges cover items such as commission paid to stockbrokers, bank transaction charges, stamp duty and platform fees paid when a fund manager engages in trading within the fund. The full transaction cost data in respect of the Scheme has been provided by the fund managers.

Isio have reviewed the transaction costs and are comfortable they are broadly reasonable. The Trustees will look to undertake a more detailed review over 2023.

Isio's view of the TER is detailed on page 16.

Charge Cap

A charge cap applies to the default investment strategies that are being used as qualifying schemes for automatic enrolment purposes. No member funds in a default investment strategy for automatic enrolment can exceed this charge cap limit of 0.75% per annum.

The Trustees can confirm compliance with the charge cap requirements during 2022 and continue to ensure ongoing compliance via routine monitoring.

Flat Fee De-minimis changes

The Trustees have implemented a de-minimis amount of £102, below which a flat fee cannot be charged to members. This de-minimis amount only applies to those members for whom a flat fee and Annual Management Charge (AMC) are being charged.

The Trustees can confirm compliance with the flat fee de-minimis of £102, below which a flat fee cannot be charged, during 2022 and continue to ensure ongoing compliance via routine monitoring.

Total Expense Ratio (TER)

The Trustees asked Isio to examine the investment management and platform charges payable by members. The sum of these charges is referred to throughout this document as the Total Expense Ratio or “TER”.

The average TER for the default investment strategies that were in place during the year, are as follows:

Lifestyle strategy	Average TER*
Cushon Sustainable Investment Strategy	0.50-0.55%
<i>Cautious Lifestyle</i>	0.50-0.55%
<i>Balanced Lifestyle</i>	0.50-0.55%
<i>Ascot Lloyd Pension Trust</i>	0.50%
<i>Spinnaker Master Trust</i>	0.96%
<i>Mapped Investment funds</i>	0.45%
<i>Cushon Flexible Retirement</i>	0.52%

*weighted average

Within the average TER for the default investment strategy, members receive the following investment-related benefits:

- Investment strategy: this takes account of membership needs and controls risks as members approach retirement and the need for protection increases;
- Investment performance: Most funds have performed as expected and in line with fund objectives).

The 2020 survey of charges (the most recent survey) published by the Department for Work and Pensions (“DWP”) places the average member charge for qualifying DC arrangements at 0.48% for bundled services (i.e., investment and administration services) and 0.49% for unbundled. The corresponding member charges within this survey for qualifying and non-qualifying master trusts are 0.48% and 0.31% p.a. respectively.

Having assessed the services covered by the fund charges paid by members Isio notes that the TERs paid by members in the current and legacy strategies were above average relative to the market. As a result, the Trustees completed an investment strategy review, which included a review of costs across all sections of the Scheme, with the aim of ensuring the Scheme default investment strategy provides value for members going forwards.

Default & Self-select charge information

Cushon Sustainable Investment Strategy – Fund charges to 31 December 2022

The level of charges applied to the Cushon Sustainable Investment Strategy is set out below.

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs
Cushon Sustainable Investment Strategy – Growth phase	0.20 to 0.72	0.009	0.209 to 0.729	0.0001
Cushon Sustainable Investment Strategy – Pre-retirement phase	0.20 to 0.72	0.0225	0.2225 to 0.7425	0.0002

The full breakdown of default investment strategy fund charges to 31 December 2022 are included within Appendix 2.

The other default investment strategies in place during 2022 are detailed within appendices 5 to 9.

Retirement Bridge - Fund charges to 31 December 2022

The level of charges that apply to the Retirement Bridge Target-Dated Funds are set out in the table below.

Fund Name	A – Annual Management Charge (AMC) (% per annum)	B – Additional Expenses (% per annum)	C – Expense Ratio (% per annum)	Transaction Costs
AB Retirement Bridge 1948 Drawdown Strategy	0.8290	0.0210	0.8500	0.0017
AB Retirement Bridge 1950 Drawdown Strategy	0.8280	0.0220	0.8500	0.0014
AB Retirement Bridge 1951 Drawdown Strategy	0.8280	0.0220	0.8500	0.0013
AB Retirement Bridge 1953 Drawdown Strategy	0.8270	0.0230	0.8500	0.0012
AB Retirement Bridge 1954 Drawdown Strategy	0.8260	0.0240	0.8500	0.0012
AB Retirement Bridge 1956 Drawdown Strategy	0.8250	0.0250	0.8500	0.0011
AB Retirement Bridge 1958 Drawdown Strategy	0.8240	0.0260	0.8500	0.0010
AB Retirement Bridge 1960 Drawdown Strategy	0.8240	0.0260	0.8500	0.0010
AB Retirement Bridge 1961 Drawdown Strategy	0.8240	0.0260	0.8500	0.0010
AB Retirement Bridge 1964 Drawdown Strategy	0.8240	0.0260	0.8500	0.0010
AB Retirement Bridge 1966 Drawdown Strategy	0.8240	0.0260	0.8500	0.0010
AB Retirement Bridge 1967 Drawdown Strategy	0.8240	0.0260	0.8500	0.0000
AB Retirement Strategies Fund 2026-2028	0.7790	0.0150	0.7940	0.0010
AB Retirement Strategies Fund 2032-2034	0.7780	0.0250	0.8030	0.0005
AB Retirement Strategies Fund 2035-2037	0.7780	0.0290	0.8060	0.0003

AB Retirement Strategies Fund 2038-2040	0.7770	0.0290	0.8070	0.0004
AB Retirement Strategies Fund 2041-2043	0.7770	0.0270	0.8040	0.0005

Self-Select - Fund charges to 31 December 2022

The level of charges that apply to the current self-select funds offered to members for investment are set out in the below.

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs
Cushon Cash	0.190 to 0.660	0.0000	0.190 to 0.660	0.0003
Cushon Fixed Interest Gilts	0.178 to 0.720	0.0000	0.178 to 0.720	0.0000
Cushon Global Impact	0.540 to 0.720	0.0300	0.5700 to 0.750	-0.0009
Cushon Index-Linked Gilts	0.178 to 0.648	0.0000	0.178 to 0.648	0.0005
Cushon Shariah	0.440 to 0.720	0.0000	0.440 to 0.720	0.0000
Cushon Sustainable Emerging Market Equity	0.390 to 0.720	0.0000	0.390 to 0.720	0.0015
Cushon Sustainable Europe (ex UK) Equity	0.243 to 0.720	0.0000	0.243 to 0.720	-0.0003
Cushon Sustainable Global Equity	0.235 to 0.720	0.0000	0.235 to 0.720	0.0012
Cushon Sustainable Japanese Equity	0.243 to 0.720	0.0000	0.243 to 0.720	0.0006
Cushon Sustainable North American Equity	0.243 to 0.720	0.0000	0.243 to 0.720	-0.0004
Cushon Sustainable Pacific ex Japan Equity	0.243 to 0.720	0.0000	0.243 to 0.720	0.0021
Cushon Sustainable UK Corporate Bonds	0.225 to 0.720	0.0000	0.225 to 0.720	0.0000
Cushon Sustainable UK Equity	0.194 to 0.720	0.0000	0.194 to 0.720	0.0478

The full breakdown of self-select fund charges to 31 December 2022 is included within Appendix 3.

Some of the funds in the above table are the same but with a different AMC. This reflects the commercial requirement to cover costs but still allow the Scheme to remain open to the very smallest employers and deliver the same features and Scheme benefits.

Illustration of charges and disclosure costs

The following table sets out an illustration of the impact of charges and transaction costs on the projection of an example member's pension savings.

The "before costs" figures represent the projected pensions savings assuming an investment return with no deduction of member borne fees or transaction costs. In comparison, the "after costs" figures represent the projected pension savings using the same assumed investment return after deducting the member borne fees.

An illustration is shown for each of the default investment strategies. In addition, we have included detail on the following funds:-

- The fund into which most members invest – this is the Cushon Sustainable Investment Strategy.
- The fund(s) with the highest before-costs expected return – this is the Cushon Sustainable Emerging Market Equity fund.
- The fund(s) with the lowest before-costs expected return – these are the gilt and cash funds; we have illustrated the Cushon Cash Fund.

Notes to the illustrations detailed overleaf are:

- Values shown are estimates and are not guaranteed.
- Projected pension pot values are shown in today's terms.
- Costs and charges applied to the pension pot are assumed to remain at the same level throughout the term of the pension as those that applied during 2022.
- Future investment growth is determined by the investment fund selected and are in line with the method and assumptions governing Statutory Money Purchase Illustrations (SMPI) as detailed by the Faculty and Institute of Actuaries in Technical Memorandum 1 (TM1). The assumed growth rate for the Cushon Sustainable Investment Strategy is 4.2% per annum; the Cushon Sustainable Emerging Market Equity Fund is 6.0% per annum and the Cushon Cash Fund is 0.5% per annum.
- Future changes in investments as a result of lifestyling have been factored into the calculations, where applicable.
- The total costs and charges are assumed to be at a rate of 0.50% per annum for the Cushon Sustainable Investment Strategy, the BlackRock Emerging Market Equities fund and the Cushon Cash Fund. These charges are in line with the average Total Expense Ratio detailed within this Chair's Statement.
- Inflation is assumed to be 2.0% each year.
- The starting pot size is £6,500.
- The starting salary is assumed to be £26,000.
- The projections assume that salaries increase in line with inflation, which is assumed to be 2.0% per annum, to allow for prudence in the projected values.
- Contributions are assumed to be 8.0% per year (employee plus employer contribution) for the Cushon Sustainable Investment Strategy, the Cushon Sustainable Emerging Market Equity Fund and the Cushon Cash Fund. 8.0% is the actual average contribution received for the contributory sections of the Scheme.

This illustration has been produced having regard to the Department for Work and Pensions 'Reporting of costs, charges and other information: guidance for trustees and managers of relevant occupational schemes' effective from 1 October 2018 and updated 27 October 2021. The Trustees investment advisers have confirmed that this illustration does not deviate from the principles in that guidance.

The illustration of charges and disclosure costs for the default strategies that are no longer part of the Scheme but were in use during the year are included within Appendix 12. The same assumptions detailed on this page are used.

Projected pension pot in today's money

Years from now	Cushon Sustainable Investment Strategy (Most Popular)		Cushon Sustainable Emerging Market Equity (Highest expected return)		Cushon Cash (Lowest expected return)	
	Before charges	After charges	Before charges	After charges	Before charges	After charges
0	£6,500	£6,500	£6,500	£6,500	£6,500	£6,500
1	£8,676	£8,633	£8,791	£8,747	£8,440	£8,398
2	£10,897	£10,799	£11,169	£11,068	£10,350	£10,257
3	£13,164	£12,998	£13,639	£13,467	£12,231	£12,078
4	£15,479	£15,233	£16,205	£15,945	£14,082	£13,862
5	£17,842	£17,502	£18,868	£18,506	£15,905	£15,610
10	£30,414	£29,396	£33,808	£32,647	£24,601	£23,824
15	£44,353	£42,255	£51,858	£49,308	£32,640	£31,228
20	£59,809	£56,158	£73,669	£68,942	£40,071	£37,901
25	£76,949	£71,193	£100,032	£92,083	£46,937	£43,913
30	£95,961	£87,454	£131,900	£119,361	£53,281	£49,327
35	£117,050	£105,042	£170,427	£151,520	£59,141	£54,201
40	£140,446	£124,067	£217,010	£189,436	£64,552	£58,587
45	£165,529	£143,891	£273,337	£234,659	£69,547	£62,532
50	£185,960	£154,625	£341,451	£287,474	£74,157	£66,078

Core Financial Transactions

The Trustees are required to report on the processes and controls in place in relation to the “core financial transactions”. The law specifies that these include the following:

- investing contributions paid into the Scheme;
- transferring assets related to members into or out of the Scheme;
- transferring assets between different investments within the Scheme; and
- making payments from the Scheme to or in respect of members.

The Trustees must ensure that these important financial transactions are processed promptly and accurately. In practice these tasks are delegated to the Scheme Administrator, HS Pensions.

The average number of working days from the date that contributions are received to the date of payment to the investment manager has been 1 day.

The average working days from the date of contribution receipt to date of actual investment has been 3 days.

The table below sets out how HS Pensions has performed over the year in the processing and payment of death claims, retirement settlements, transfers into and out of the Scheme and investment switch instructions.

HS Pensions Performance against Service Level Agreement

Task	Completed - Total	Completed – In Target	% Completed within SLA
Deaths	132	95	72
Retirement Settlement	603	570	95
Transfer In	521	472	91
Transfer Out	1866	1644	88
Investment switch	474	468	99

Performance of processing certain transactions has improved by adding functionality on the Cushon App and Member Portal. Members can initiate fund switches, transfers in and out and retirement quotations on the Cushon App and the Member Portal, and update their death benefit nomination form, all reducing the time taken for these events to be concluded. That being said, the Scheme Administrator, HS Pensions, has a backlog of work which is impacting the service that they are providing to Scheme members, in particular with regard to death cases. Actions to address this backlog are being taken and the Trustees are closely monitoring this activity to ensure that the service provided returns to the standards expected by the Trustees.

The Scheme ‘core financial transactions’ have not been impacted by the backlog issue and continue to be processed promptly and accurately (having regard to TPR’s DC Administration Guidance), which is pleasing.

During 2021 a correction to the lifestyle profiling / rebalancing work was identified. For a small number of members and over a limited time period assets had not been re-balanced in the period prior to the de-risking phase and also assets had not been switched to reflect the correct risk profile during the de-risking phase. Work on correcting all member records and making detriment payments was completed during 2022/23. There remains a small number of members who have transferred out of the Scheme, where payments are required. The Scheme Administrator is liaising with the receiving provider to ensure all payments are made. No action was taken for those members who were in a better position.

Monitoring employer contributions

An important factor in collecting contributions from employers is the success or otherwise of making a direct debit (DD) transaction. Statistics from HS Pensions show that DDs average at over 99% success each month. HS Pensions have processes in place to identify and follow up on the failures. This includes system-generated reports that enable the administrators to contact the employers. The cause of these failures is typically due to either the employer cancelling the DD or not having sufficient funds in their account.

If this was anything other than an accidental lapse, and contributions do not follow promptly, the contribution monitoring protocols come into play. These protocols aim to initiate a rapidly escalating chasing process carried out by HS Pensions on behalf of the Trustees that reminds the employer of its responsibility and moves on to notifying the members and TPR, as is required by law. HS Pensions provides the Trustees with a monthly report on the payment of contributions and any action taken in respect of late payments. This includes whether they have had to instigate the contribution monitoring protocol.

Data quality

The Trustees regularly review the quality of the Scheme data, with a formal annual common and Scheme specific data check taking place. The last checks having been completed by HS Pensions in December 2022 and an action plan put in place thereafter to improve data quality.

Conclusion

We are comfortable that core transactions were processed promptly and accurately throughout the year. However, the Trustees have concerns about the service levels being provided in respect of certain administration tasks and have raised this directly with HS Pensions who have added additional resource to ensure these service levels improve throughout 2023 to reach the Trustees expected service standards.

Value for Members

The Trustees complete an annual value for members assessment, in which they consider the following aspects against the expected outcome in each area:-

- The investment outcomes, i.e., investment governance, decisions and implementation.
- The quality of administration, service and support, i.e., administration overall, communications and engagement and employer support.
- Member borne costs and charges, i.e. - Annual Management Charge (AMC), Total Expense Ratio (TER) and any other member charges.

When completing the assessment, the Trustees consider whether the investments, options, benefits offered by the Scheme and the costs and charges payable by members represent good value when compared to other options available in the market.

There is no objective legal definition of “good value” and so the process of determining good value for members is not wholly objective and requires the Trustees to exercise their judgement. In doing so, the Trustees have been guided by TPR’s value for members guide.

Value for members is not solely about providing a low-cost investment vehicle. The Trustees also consider other aspects of the Scheme that provide value and have formed an assessment about the quality and scope of these services, how these have performed over the year and whether they think this will continue into the future. The Trustees have determined that value for members can be assessed by looking at the following areas:-

Investment outcomes

- If investment strategies were well designed and monitored in line with member needs;
- If investment decisions were robust and take account of relevant factors;
- If member assets are held securely and invested as promised.

Quality of administration, service and support

- If member records are accurate and benefits secure and accessible when due;
- If members receive quality mandatory communications, enhanced by effective engagement that helps support informed decision making;
- If employers are supported in fulfilling their Auto-Enrolment duties and in considering member contribution levels.

Member borne costs and charges

- If the AMC is in line with investment outcomes and service received, when benchmarked against similar member/employer cohorts;
- If historical TER’s and additional expenses are appropriate;
- If transaction costs are in line with industry and sector norms.

When considering the value for member assessment and reviewing documented criteria the Trustees have reached the following conclusions in each area:-

Investment outcomes

The Trustees are responsible for the investments that are made available to members, with investment advice sought from their appointed investment adviser, Isio.

During the year the Trustees have completed a review of the default investment strategy and the self-select range available to members. This review included a review of the Trustees investment beliefs, Statement of Investment Principles, Responsible Investment Policy and Voting Preference letters.

The Trustees recognise Environmental, Social & Governance (‘ESG’) considerations as material and dynamic sources of risks and opportunities and believe that incorporating ESG factors, including climate change, into investment decision making is in the best interests of members, in accordance with our legal duties. In the previous year the Trustees had set a target to ensure that, at launch, the new default investment strategy would have a carbon footprint of at least 20% lower than the old default

arrangements and the Trustees are pleased to report that this target was met. Ambitious targets for 2023 have now been set.

Discussion on the Scheme investments took place at 4 quarterly Trustee meetings plus 11 further investment meetings, at which the Trustees met with their Investment Adviser, Investment Platform Provider and Investment Fund Managers to discuss and consider all aspects of the investment proposition, with value for members at the heart of all of these discussions.

Investment Governance

The Trustees aim is to have an investment strategy that is well designed and monitored in line with member needs. When considering whether this objective is met, the Trustees assessed the following criteria and evidence:-

- Do they have access to quality strategic investment advice and manager research/due diligence;
- Clear aims and objectives of the default and self-select strategies;
- Completion of regular reviews of the default and self-select strategies suitability for member needs;
- Consideration of member characteristics trends;
- Regular quality reporting of investment outcomes and monitoring of alignment to the Trustees investment policies and objectives;
- Investment managers and funds monitored for alignment to the Trustee Investment beliefs, including ESG and stewardship policies;
- Trustees benchmarking investment outcomes against peers and adequacy outcomes (e.g., PLSA and Retirement Living Standards).

Taking into account this criteria and evidence the Trustees have determined that investment strategies are well designed and monitored in line with member needs.

In addition, the Trustees have noted that the default investment strategy received a Pension Age Award for Best Investment Strategy during the year which supports the Trustees positive assessment. The Trustees do, however, believe that they can do more to understand the Scheme membership, particularly with regard to their retirement needs and will be working to develop this during 2023 and beyond.

Investment Decisions

The Trustees aim is that investment decisions are robust and take account of relevant factors. When considering whether this objective is met, the Trustees assessed the following criteria and evidence:-

- Whether the quality and performance of the Investment Adviser is assessed regularly and benchmarked against the market;
- The Trustees considerations on investment innovations in UK Defined Contribution (DC) schemes and their potential benefits for members;
- Whether the Trustees take appropriate and timely action when investment outcomes are not within expectations or misaligned with investment policies;
- Whether the Trustees consider member trends that impact investments.

Taking into account this criteria and evidence the Trustees have determined that investment decisions are robust and take account of relevant factors. They note that the default investment strategy is innovative but they do acknowledge that the move to this investment strategy could have been acted upon in a timelier manner. In addition, work is required on the investment strategy in retirement which the Trustees believe can be improved upon, they will be working on this throughout 2023.

Investment Implementation

The Trustees aim is that members assets are held securely and invested as promised. When considering whether this objective is met, the Trustees assessed the following criteria and evidence:-

- Thorough operational due diligence and ongoing monitoring of the investment platform is completed to provide members security of assets;
- Administration Reports show members' money (contributions, switches, and transfers) invested in a timely fashion and into the right funds;

- Investment errors reported and corrected;
- Lifestyling/rebalance completed on time and accurately;
- Effective interface with systems to complete investment transactions (HS, Cushon, Origo, Mobius).

Taking into account this criteria and evidence the Trustees have determined that member assets are held securely and invested as promised. They have, however, acknowledged that there has been a lifestyling incident which is being corrected and rectification paid. This is a minor incident but the Trustees want to ensure that controls are put in place to avoid any future occurrence of this type of incident.

Quality of administration, service and support

The Trustees are keen to provide as much useable information as they can to employers and members, to help them understand their pension better and the importance of monitoring pensions savings and achieving an optimal outcome.

Much of the Trustees responsibility in this area is delegated to Cushon and the Scheme Administrator,

Administration

The Trustees aim is that member records are accurate, benefits secure and accessible when due. When considering whether this objective is met, the Trustees assessed the following criteria and evidence:-

- Regular Administration Reports are received, indicating quality administration service;
- SLAs are monitored and action taken where below standard;
- AAF Reports and other relevant party assurance obtained;
- Financial transactions processed promptly and accurately;
- All systems and processes monitored for cyber, fraud and other relevant risks.

Taking into account this criteria and evidence the Trustees have determined that the administration provided to members is satisfactory only. There is a backlog of transfers and death cases which is impacting the service levels being provided to members. This is being addressed but in the meantime the service levels fall below the Trustees expectations.

During the year, HS Pensions has been acquired by the Link Group and the Trustees are looking forward to realising the benefits that the Link Group can bring to the Scheme for the benefit of our members.

Communication and Engagement

The Trustees aim is that members receive quality, mandatory communications, enhanced by effective engagement that helps support informed decision making. When considering whether this objective is met, the Trustees assessed the following criteria and evidence:-

- Are standard communications clear, easy to understand, jargon free & appropriate for membership and issued in a timely fashion;
- Are notices of changes that affect members clear, especially those with a call to action;
- Are newsletters and ad-hoc communications relevant and do they promote good member outcomes, including the importance of regular contributions;
- Is the Member Portal/Cushon App available and has the provider committed to digital engagement;
- Is support and signposting available for informed member decision-making especially at retirement;
- Call line and other inbound services available and of a good quality;
- Does member feedback and testing lead to continuous improvement across all services.

Taking into account this criteria and evidence the Trustees have determined that communication and engagement is much improved. When all members are transitioned to the Cushon App (scheduled to be completed during 2023) this area will improve further. Work is continuing to try to engage members better and ensure they understand the benefits of their pension and the benefits it can deliver.

The Trustees note that there is a need to prioritise a long-term effective retirement solution and progress on this will be made throughout 2023. This will further enhance the benefits to the members.

Employer Support

The Trustees aim is that employers are supported in fulfilment of their Auto-Enrolment duties and consideration of member contribution levels. When considering whether this objective is met, the Trustees assessed the following criteria and evidence:-

- Is the employer Portal available and working effectively;
- Are the Contribution Monitoring processes and communications effective;
- Is FAQ's documentation and employer support available.

Taking into account this criteria and evidence the Trustees have determined that employer support is good. This assessment is supported by the Cushon Client Success team who support employers with all pension related enquiries.

Member borne costs and charges

Details of the costs and charges associated with membership of the Scheme is detailed on page 15. These charges vary, dependent upon the commercial terms agreed with your employer.

Annual Management Charge (AMC)

The Trustees aim is that the AMC is in line with the investment outcomes and service received, when benchmarked against similar member/employer cohorts. When considering whether this objective is met, the Trustees assessed the following criteria and evidence:-

- AMC appropriate for each default and self-select option (given the assets held and design);
- Whether the Cushon Platform Charge, that makes up the AMC, is competitive for the services provided;
- The changes applying to the Retirement Bridge offering.

Taking into account this criteria and evidence the Trustees have determined that a greater consistency of charges, across the scheme is desirable. The Trustees need to have a better understanding of how Cushon set the variable Cushon platform charge on top of the fixed investment costs. This has been raised with Cushon and the Trustees will progress these discussions throughout 2023.

Total Expense Ratio (TER)

The Trustees aim is that the historical TER and additional expenses are appropriate. When considering whether this objective is met, the Trustees assessed the following criteria and evidence:-

- Charge cap compliance confirmed (Auto-Enrolment);
- Mobius Life reporting;
- Retirement Bridge.

Taking into account this criteria and evidence the Trustees have determined, with input from Isio, that the TER and additional expenses are broadly appropriate. However, as with the AMC the Trustees wish to have a greater consistency of the Cushon Platform Charge that makes up the TER and discussion on this will take place throughout 2023.

Other Member Charges

The Trustees aim is that transaction costs are in line with industry and sector norms. When considering whether this objective is met, the Trustees assessed the following criteria and evidence:-

- Are transaction costs within tolerance, considering any investment restructure during the period;
- Other member charges e.g., flat fee structures and intermediary fees.

Taking into account this criteria and evidence the Trustees have determined, with input from Isio, that the other member charges are broadly appropriate, particularly given the move to the new default investment strategy and self-select range during the year.

The total fund charges paid by members are above average relative to the market. The Trustees have therefore committed to the following actions during 2023:-

- Ensure all members have access to the Cushon App and the benefits this provides.
- Aim to improve member engagement.
- To further develop and improve the Cushon Sustainable Investment Strategy.
- For the target allocation to the Schroders Climate + to be achieved.
- To enhance the retirement options available to members.

Conclusion

In conclusion, the Trustees have determined following a review in May 2023, that the Scheme provides satisfactory value for members currently, however, there is work to do and the Trustees planned work during 2023 should improve this assessment, when complete.

Trustee Knowledge and Understanding

Occupational pension schemes, such as this Scheme, are complex structures and the level of knowledge and expertise required of the Trustees is rightly set at a high level. The pensions landscape is in a constant state of development, as new regulations and legislation impacts on the way in which schemes must be governed.

The law requires the Trustees to possess, or have access to, sufficient knowledge and understanding to run the Scheme effectively. This includes the requirement for the Trustees to have knowledge and understanding of the law relating to pensions and trusts, and the principles relating to the investment of the assets of the Scheme. It also requires the Trustees to have a working knowledge of the Scheme Trust Deed and Rules, Statement of Investment Principles, and other Scheme policy documentation relating to the administration of the Scheme.

As part of our new Trustees' induction process, Trustees familiarise themselves with these documents and many other key Scheme documentation, including the Trustees' Governance Plan and Policies.

The Scheme documents are referenced during meetings and any amendments considered as specific agenda items.

The Trustees have access to the Trustee SharePoint site, which is a secure online portal holding key documentation for the Scheme. During 2023 it is intended for specific Board Pack Technology to be rolled out for use by the Trustees. This will enable to the Trustees to collaborate, review meeting packs and access all Trustee Board documentation and knowledge in a single, secure AI-powered ecosystem.

The Trustees take their training and development responsibilities seriously and keep a record of the training completed and provide this to the Scheme Secretary every quarter and upon request. Training activities completed during 2022 have covered all aspects of DC scheme governance, pensions and trust law, investment principles and strategy, member engagement, TCFD and other relevant topics. Each Trustee has logged at least 30 hours on these activities during 2022.

All of the Trustees have completed the relevant modules of the Trustee Toolkit which have been made available by TPR.

During the Scheme Year and following on from TPR's DC Master Trust Authorisation process the Trustees continue to monitor and review the Scheme's operations, and the Trustees' duties and obligations as part of this process.

The Trustee Board's combined knowledge and understanding is wide ranging and together with the ongoing training and development that is undertaken, and the use of appointed third party advisers on matters such as investment and legal, enables the Trustees to exercise properly their functions as the Trustees of the Scheme. Nonetheless there is no room for complacency, and it is for this reason that Trustee Knowledge and Understanding is reviewed on an ongoing basis as a regular topic for discussion at each formal quarterly Trustee meeting.

During the 2022 Scheme year the Trustees demonstrated their continued satisfaction of the 'Trustee Knowledge and Understanding' requirements in a number of ways:

- The Trustees continued to review all of the procedures and process involved in the administration and governance of the Scheme. This included checking their familiarity with the governing documents, in particular the Trust Deed and Rules was consolidated into one document, following legal advice. A detailed analysis of the Trustees' various policies relating to the good administration of the Scheme was completed;
- The Trustees actively engaged with their professional Investment Adviser prior to the launch of the new default investment strategy, the Cushon Sustainable Investment Strategy. This included a review of the Statement of Investment Principles (SIP) to ensure the Trustees on were fully versed with this document and had considered the investment principles. The Trustees conduct training on an ongoing basis to ensure they have sufficient knowledge and understanding of the relevant principles relating to the investment of occupational schemes ensuring this remains suitable. Throughout the year, there has been one formal review and amendment to the SIP and a further review completed since year end (dated 9 June 2023 and

attached in Appendix 1) conducted by the Trustees. Further detail on this is contained on page 6;

- Leading on climate change reporting on the Occupational Pensions Stewardship Council (OPSC).
- Read legislation and Regulations at source, in particular relating to Responsible Investment, together with summaries and interpretations published in the professional journals and by specialist pensions advisers on an ad-hoc basis focussing on areas of interest in industry publications and items directly affecting the Scheme. The Trustees will conduct training on an ongoing basis to ensure they can demonstrate sufficient knowledge and understanding of pensions and trust law;
- Read the output produced by TPR, in particular the Codes of Practice and supporting guidance;
- The Trustee Toolkit is an e-learning programme produced by TPR, the Trustees are comfortable with the subject material contained within them and review, as necessary;
- Attending and contributing to specialist pensions conferences and seminars, hosted by pensions journals, advisory firms and TPR. These events, commonly include keynote speeches from representatives of TPR and are a particularly effective means to maintain knowledge and to understand new developments.

The Trustees have a combined experience of working in the pensions industry over many years and have experienced at first hand the impact of the multitude of legislative changes and new regulations that have impacted occupational pensions over that time.

The Trustee Board covers a broad spectrum of relevant experience and a brief summary of each Trustee as at 31 December 2022 follows:-

Abundzu Limited: Represented by Barry Parr who is an independent trustee with over 20 years of experience. He is trustee of several pension schemes and master trusts and was the founding chairman of the Association of Member Nominated Trustees. Barry has attained the Award in Pension Trusteeship (PMI - APT - DC) 2011.

Capital Cranfield Pension Trustees Limited: Represented by Andrew Warwick-Thompson who is a proven board level operator who brings expertise in pensions regulation, governance, and operations of occupational pension schemes and directing their investment strategies. He is a well-known industry figure through his role as Executive Director for Regulatory Policy at TPR, where he was responsible for formulating regulatory policies. He is an affiliate Member of the Institute and Faculty of Actuaries and an Accredited Member of the Association of Professional Pension Trustees. He currently chairs the Trustee Board of the Scottish Widows Master Trust and has previously chaired the hybrid Mencap Pension Plan.

With effect from 30 June 2023, Paul Watson will represent Capital Cranfield Pension Trustees Limited.

Independent Trustee Services Limited: Represented by Dianne Day is a Client Director at Independent Trustee Services Ltd (ITS). She joined ITS in 2015, specializing in defined contribution (DC) schemes. Dianne holds the PMI Certificate in DC Governance and is an accredited professional pension trustee. Her trustee experience spans DC master trusts, single employer schemes and sole trustee roles. Dianne applies over 30 years' experience in investment management and member communications to the good governance of members' pension benefits.

Ross Trustees Services Limited: Represented by Roger Mattingly who is Chair of the Trustees of the Cushon Master Trust. Roger holds a number of trusteeships and is chair of trustees of two other master trusts. He is a Past President of the Society of Pension Professionals, a Fellow of the Institute of Directors and has been a member of various industry groups, including the Pensions Regulator's Stakeholder Advisory Panel and more recently as Chair of the Pensions & Lifetime Savings Association's (PLSA) Multi-employer Defined Benefit Committee and of the PLSA's DC Master Trust Reference Group.

The Trustees recognise the risk that their knowledge and experience could overlap to such an extent that there are areas where their combined skills are insufficient, leaving vulnerabilities in the governance of the Scheme. In order to assess the situation, the Trustees complete a skills matrix, based on a TPR published document on an annual basis. The Trustees use this analysis to determine training requirements and activities to pursue in order to fill any gaps.

All professional Trustees have achieved professional pension accreditation and are subject to continuous professional development requirements.

Barry Parr was Accredited Professional Trustee through the PMI – PTPMI (Accred).
Dianne Day, Roger Mattingly and Andrew Warwick-Thompson are all Accredited Professional Trustees through the Association of Professional Pension Trustees (APPT).

Conclusion

The Trustees consider that, due to the actions and attributes outlined above, and in conjunction with the use of their professional advisers, they have the combined knowledge and understanding and access to advice to enable them to properly exercise their functions as Trustees of the Scheme for the benefit of the Members.

Non-affiliation of trustees

The legislative requirement is for the majority of the trustees to be non-affiliated. Non-affiliated broadly means that the trustee is both currently independent of the Scheme Funder and all other undertakings which provide advisory, administration, investment or other services in respect of the Scheme, and was not an employer or officer (or equivalent) of a Scheme service provider in the five years preceding appointment. Where a non-affiliated trustee resigns, the Scheme must again aim to meet the non-affiliation requirement within three months.

Trustees can be treated as non-affiliated for a single period of up to five years and up to 10 years in total. If there is a gap of more than five years between appointments, the previous appointment is ignored when working out the total. Slightly different rules apply to professional trustee bodies. Again, they can be treated as non-affiliated for a single period of up to five years, but they are not restricted to any cumulative term. However, their individual representative cannot retain this role for more than 10 years in total, regardless of any gap between appointments. The limit on the length of appointment starts from the later of 6 April 2015 and the date of the appointment.

It is confirmed that all the Trustees, including the Chair, during the period covered by this Statement and subsequently, met this non-affiliation requirement.

The non-affiliated trustees in place during 2022 (Abundzu Limited, Capital Cranfield Pension Trustees Limited, Independent Trustee Services Limited and Ross Trustees Services Limited) or their representatives, have never provided such services to the Scheme or have been a director, manager, partner or employee of any such undertaking or any undertaking that is in the same corporate group or partnership with a service provider to the Scheme nor did they do so in the five years preceding their appointment. Nor had they ever taken any payment or benefit from the Scheme other than in respect of their role as trustee. They do not have any relationship with any of the service providers to the Scheme that would conflict with their obligations as Trustees of the Cushon Master Trust. Consequently, Abundzu Limited, Capital Cranfield Pension Trustees Limited, Independent Trustee Services Limited and Ross Trustees Services Limited were non-affiliated when appointed as Trustee and their appointments were all less than five years ago.

It should also be noted that no trustees have joined since the last Chair's Statement.

Any matters considered by the Trustees are decided by a majority, as detailed within the Scheme Trust Deed & Rules, with all Trustees having the opportunity to feed into the decision making process.

Conclusion

2022 continued to provide challenges to us all with the cost of living crisis impacting our daily lives. The good news was that the Scheme has robust governance and protocols in place to serve the best interests of the Scheme's Members.

There have been a lot of changes to the Scheme during 2022 and the Trustees will continue to assess the Scheme and make changes, as appropriate.

The Trustees are aware that they are making efforts to improve the Scheme but that these efforts will be wasted if members do not understand their pension and the benefits it provides. Work will therefore be increasing during 2023 to try to encourage members to engage with their pension using the Cushon App. This will enable them to see their retirement savings in real time, watch them grow and plan for when they will need to use them.

Further plans for the Trustees' for 2023 and beyond, are to:-

- Ensure all members have access to the Cushon App and the benefits this provides.
- Increase the Cushon App functionality to allow more automation of routine tasks;
- To enhance the retirement options available to members;
- Continue to evolve and improve the default investment strategy, to include reaching the target allocation within the Schroders Climate +;
- Continue to review the Trustees' investment beliefs, which feeds into the Statement of Investment Principles, Responsible investment and Stewardship Policy and to further develop the Investment Governance Reporting Framework;
- Explore further investment policies and strategies that achieve the Trustees investment beliefs;
- Relaunch the Cushon website and use this as an information source and communication tool;
- Consider further ways to enhance and improve value for members and member engagement;
- Get ready for the launch of the Pensions Dashboard.

It is an exciting time for the Cushon Master Trust and the Trustees look forward to working with Cushon and developing technology so that employers and members alike can benefit from the fintech revolution.

Finally, please note the Trustees have an email address (trustees@cushon.co.uk) to allow members to contact them directly and provide feedback and comments on any aspects affecting the Scheme and their membership.

A handwritten signature in blue ink, appearing to read "R. Mattingly", with a long horizontal flourish extending to the right.

Roger Mattingly
Chair of Trustees
28 July 2023

APPENDIX 1 – Statement of Investment Principles

Statement of Investment Principles

June 2023

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1. Introduction

This document constitutes the Statement of Investment Principles (the "SIP") required under Section 35 of the Pensions Act 1995 for the Cushon Master Trust (the "Scheme"). It describes the investment strategy being pursued by the Trustees of the Scheme (the "Trustees") and is in compliance with our understanding of the requirements of the Occupational Pension Schemes (Investment) Regulations 2005, Occupational Pension Schemes (Charges and Governance) 2015, the Pension Protection Fund (Pensionable Service) Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018, and the Pensions Regulator's Code of Practice in relation to governance of DC pension schemes issued in July 2016 in force at the time of preparing this document.

The Trustees confirm that, before preparing this SIP, they have consulted with Cushon MT Limited (the "Company") and taken appropriate advice from their advisers. The Investment Adviser is Isio Group Limited, and the Legal Adviser is ARC Pensions Law LLP.

The Trustees believe their advisers to be qualified by their ability and practical experience of financial and legal matters respectively and they have appropriate knowledge, and experience of the management of the investment arrangements that the Scheme requires. The Trustees also confirm that they will consult with the Company and take advice from the relevant advisers as part of any review of this SIP.

The Trustees are responsible for the investment of the Scheme's assets and arranging the administration of the Scheme. Where they are required to make an investment decision, the Trustees always receive advice from the relevant advisers first and they believe that this ensures that they are appropriately familiar with the issues concerned.

In accordance with the Financial Services & Markets Act 2000, the Trustees set general investment policy, but have delegated the day-to-day investment of the Scheme's assets to professional fund managers (the "Investment Managers") using pooled funds held via an investment platform, in accordance with Section 34(2) of the Pensions Act 1995. The Managers are authorised under the Financial Services & Markets Act 2000, provide the expertise necessary to manage the investments of the Scheme competently and will comply with the requirements of Section 36 of the Pensions Act 1995.

Declaration

The Trustees acknowledge that it is their responsibility, with guidance from their advisers, to ensure the assets of the Scheme are invested in accordance with these Principles.

Signed: 

Date: 9 June 2023

Chair of Trustees

For and on behalf of the Trustees of the Cushon Master Trust.

2. Governance

The Trustees are responsible for the governance and investment of the Scheme's assets. They consider that the governance structure set out in this SIP is appropriate for the Scheme as it allows the Trustees to make the important decisions on investment strategy, while delegating the day-to-day aspects to the Investment Managers or the advisers as appropriate. The responsibilities of each of the parties involved in the Scheme's governance are detailed below.

Trustees

The main investment related responsibilities of the Trustees include:

- a) Ensuring the Scheme meets all regulatory requirements.
- b) Reviewing, at least triennially (or following significant changes to the investment strategy), or, in respect of default arrangements, the membership profile, the content of this SIP and modifying it if deemed appropriate.
- c) Reviewing the investment strategy for the Scheme in terms of providing a default strategy and a wider range of self-select funds from which members may choose to invest (see Appendix).
- d) Assessing the quality of the performance and process of the Investment Managers by means of regular reviews of the investment results and other information, through meetings and written reports.
- e) Monitoring compliance of the investment strategy with the SIP on an ongoing basis.
- f) Appointing and dismissing Investment Managers.
- g) Assessing the performance of their advisers.
- h) Consulting with the Company when reviewing investment strategy issues.
- i) Communicating to members as appropriate.
- j) Making this SIP publicly available.

Investment Adviser

The Investment Adviser will be responsible for, amongst other things:

- a) Participating with the Trustees in reviews of this SIP.
- b) Assisting the Trustees with reviewing the default strategies and wider self-select fund range.
- c) Advising the Trustees of any changes in respect of the Investment Managers that could affect the interests of the Scheme.
- d) Advising the Trustees of any changes in the investment environment that could either present opportunities or risks to the Scheme.
- e) Undertaking reviews of the Scheme's investment strategy including reviews of the Scheme's structure, current Investment Managers, and selection of new Investment Managers as appropriate.

Legal Adviser

The Legal Adviser will be responsible for, amongst other things:

- a) Acting on Trustee instructions to ensure legal compliance including those in respect of investment matters.

The Trustees and their advisers also have additional responsibilities with respect to responsible investing, and complying with the Trustees' reporting requirements for the Task Force on Climate-related Financial Disclosures ("TCFD"). These are outlined in the Trustees' Responsible Investment and Stewardship policy.

3. Investment Beliefs

The Trustees have formulated a set of investment beliefs, which will be considered when developing the investment strategy to ensure that all decisions are consistent with these beliefs and are made in the interests of members. They will also form part of the investment governance reporting framework, which is used to monitor effective implementation and management of the investment funds on behalf of members. The Trustees' investment beliefs are as follows:

- Our investment objective is to maximise risk and inflation adjusted returns for our members regardless of when they take their benefits.
- We will consider a broad range of opportunities when sourcing investments, including assets on regulated and unregulated markets, and assets that are publicly and privately held, as well as different investment management styles. There may be times when certain types of investments offer better value, and we will seek to maximise these opportunities for the benefit of our members.
- There are some risks which can be rewarded, such as illiquidity, active management, and diversification. Some of these risks may be linked to responsible investment factors (such as climate change). We will seek exposure to these investment opportunities, provided they meet our investment objective and the cost of accessing the investment presents value for money for our members.
- We believe that responsible, sustainable, and social impact investment opportunities can contribute to meeting our investment objective.
- Our investment beliefs apply to all asset classes and support the principles underlying the UNPRI initiative. We will select and work with partners and other industry parties who share our beliefs.
- Climate change poses a material financial risk to our members. To this end, the Trustees offer default options which have lower greenhouse gas emissions than a typical UK Pension Scheme. We have also agreed to the following climate targets for our default strategies:
 1. For the carbon footprint (scope 1 & 2) to be at least 80% lower than the 2022 baseline by 30 Sep 2030.
 2. Achievement of net zero well in advance of 2050.

The 2022 baseline is defined as the weighted average carbon footprint (scope 1 & 2) of broad market indices weighted by the Cushon Sustainable investment strategy's growth phase asset allocation. These are: 90% Solactive GBS Global Markets Large and Mid-Cap, 2.5% Bloomberg Global Aggregate, 4.3% Bloomberg Global Aggregate Corporates and 3.2% 50 / 50 ICE BoA Global High Yield / Global Investment Grade.

- We will survey member views and preferences via the Cushon App and take these into consideration when developing the Policy and our investment beliefs over time, to the extent that to do so does not conflict with our legal obligations and fiduciary duties as pension scheme trustees. The Trustees may take member views into account when choosing self-select options. Member investment choice will be provided through the self-select investment options for those members who wish to express different beliefs in how their pension pot is invested.

4. Investment Options

Implementation of investments

The Trustees have appointed Mobius Life as the platform provider for the pooled funds that make up the Scheme's investment options for members. These funds are then managed by underlying investment managers which are detailed in the Appendix.

Member administration services are provided to the Trustees by HS Pensions Limited. An administration platform is provided to the Trustees by Cushon Group Limited. Member contributions will be invested in line with their selected choice of funds. Where a member has not made an active selection, their contributions will be invested in the chosen default strategy.

Range of investment options

In designing the investment options, the Trustees have considered members' changing risk and return requirements over time and member outcomes. The Trustees will ensure that each member's investments are invested in accordance with the fund options selected by the member, or in the absence of an investment choice, the Trustees' chosen default strategy.

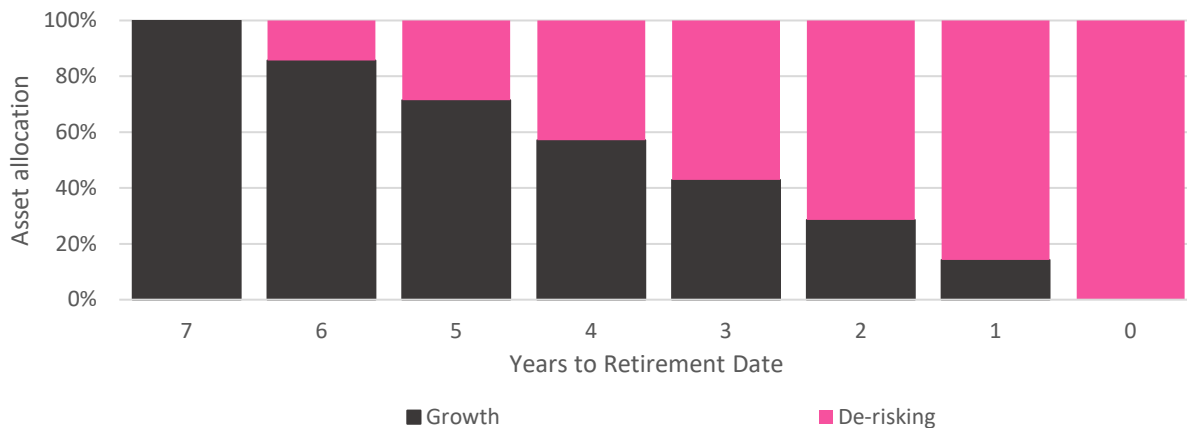
When implementing any changes to the investment strategy, the Trustees, in conjunction with their advisers, will look to mitigate the potential risks and costs to members as a result of any investment transitions to the best of their ability.

Default strategy

The Trustees offer a preferred default strategy, the Cushon Sustainable Investment Strategy, and an alternative default strategy, the Cushon Core Investment Strategy, for Employers wanting a default strategy with lower investment management costs that has no allocation to Private Markets.

Both default strategies have been selected in the best interest of the majority of members and beneficiaries, and the Trustees undertake periodic reviews on the suitability of the strategies. Further details on the Cushon Sustainable Investment Strategy and Cushon Core Investment Strategy are contained within the Appendix.

Members who do not make a specific investment choice will be automatically invested in the chosen default strategy. This phases a member's assets through different funds as retirement approaches. The Cushon Sustainable Investment Strategy and Cushon Core Investment Strategy have the same de-risking profile, set out in the chart below. The Trustees define de-risking as when members move to an asset allocation with a lower expected risk (measured by volatility) based on their long-term assumptions, although the Trustees recognise that this may not always be the case in some given market environments.



5. Trustees' Policies

The balance between different kinds of investments

The balance between different kinds of investments is shown in the Appendix. The choice of investment options for members is designed to ensure that members can choose investments that are adequately diversified and suitable for their profile.

The Trustees monitor the investment options regularly to ensure that they are comfortable with the choice of funds offered to members. The Trustees are satisfied that, taken in aggregate, the funds offered are appropriate for different categories and ages of members.

Realisation of investments

Funds used within the two default strategies are unit linked pooled funds. This means that the money invested by members is pooled together with other people and invested in a collective investment. All of the funds are daily dealing, other than the private markets allocation within the Cushon Sustainable Investment Strategy which is quarterly dealing. The Trustees have an agreed process to managing the liquidity to allow for the quarterly dealing of the private markets allocation.

If an investment manager no longer meets the relevant Trustees' selection criteria, the Trustees could choose to realise (sell) the investment fund.

Security of assets

The Scheme's assets are held on the Mobius Life platform via an insurance policy called a Trustee Investment Plan. Mobius Life are a regulated Life Insurance Company and the Prudential Regulatory Authority ("PRA") and Financial Conduct Authority ("FCA") govern the types of investment funds permitted on the platform.

As a regulated insurance company, Mobius Life is subject to substantial regulatory capital (solvency) requirements, which are subject to regular reporting to the PRA. Policyholders can make a claim for compensation from the Financial Services Compensation Scheme ("FSCS") in the event of Mobius Life defaulting, and Professional Indemnity Insurance is in place to cover operational risks and fraud.

Further details can be found in Mobius Life's Security of Assets policy.

Financial and non-financial material investment considerations

The Trustees consider financial factors including, but not limited to, environmental, social and governance ("ESG") issues in respect of the investment options provided. All references to ESG relate to financial factors only and include climate change.

The Trustees do not at present take into account non-financially material factors (such as members' ethical considerations or other views) when making investment decisions as part of the default arrangements.

The Trustees will survey member views and preferences via the Cushon App and take these into consideration when developing their investment beliefs over time, to the extent that to do so does not conflict with their legal obligations and fiduciary duties as pension scheme trustees. The Trustees may take member views into account when choosing self-select options. Member investment choice (such as a Shariah compliant option) will be provided through the self-select investment options for those members who wish to express different beliefs in how their pension pot is invested.

Responsible investment

The Trustees define Responsible Investment ("RI") in line with the UN-backed Principles for Responsible Investing ("UNPRI"), which states that RI is an approach to investing that aims to incorporate Environmental, Social and Governance ("ESG") factors into investment decisions, to better manage risk and generate sustainable, long-term investment returns. The Trustees believe that this approach to investment is in the best interests of our members in accordance with their legal duties. The Trustees have a separate Responsible Investment and Stewardship Policy which is subject to regular review with support from their investment adviser and the Company.

Responsible Investment is a core element of the Scheme's default investment strategies, which is set with support from their investment adviser and the Company. In making any portfolio construction decisions, the Trustees will have regard to the Responsible Investment and Stewardship Policy and their investment beliefs.

Within the self-select range, the Trustees ensure that RI is integrated as a core element of as many funds as possible, subject to availability of funds within different asset classes. The self-select range will be regularly reviewed considering market and product developments in the ESG fund sector and taking into consideration member preferences expressed through the member surveys within the Cushon App.

Stewardship

Details of Mobius Life's Engagement and Stewardship Policy can be found here:

<https://www.mobiuslife.co.uk/uploads/2022/04/cc63d2907592a5ab8d9b55e11b2e324f/mobius-life-stewardship-and-engagement-policy-2020-annual-report.pdf>

The Trustees have acknowledged responsibility for the voting and engagement policies that are implemented by the Scheme's investment managers on their behalf. It is the Trustees' intention that the investment managers appointed to run the Scheme's assets will share similar principles to them from a Responsible Investment perspective, and therefore any voting and engagement with underlying companies will be in line with the Trustees' investment beliefs. With regards to voting activity, the Trustees have shared their investment beliefs, via a Voting Preference Letter, with Mobius Life and Macquarie (manager of the global equity mandate where the Scheme is the sole investor) and will keep this under regular review. However the Trustees note that investment managers will be carrying out voting and engagement across a number of clients, and may be managing this in line with the interests of all their clients. The Trustees will keep this under review.

The Trustees have set the following stewardship priorities for the Scheme and have communicated these with their investment managers and made clear what they consider to be the most significant votes:

1. Climate alignment – decarbonising and minimising emissions
2. Climate adaptation
3. Biodiversity risk and management
4. Labour rights incl. modern slavery
5. Diversity and inclusion (on boards in particular)

The Trustees will review each manager's track record of voting and engagement (including whether they have acted on the Scheme's stewardship priorities) as part of our investment governance framework and will publish this information in our annual Implementation Statement. On an annual basis, the Trustees will also review each manager's stewardship capabilities and alignment with the Trustees' investment beliefs. If any areas of improvement are identified, the Trustees, typically via their investment advisers, will engage with managers on proposed improvement actions.

6. Monitoring

Managers

The Trustees, or their advisers on behalf of the Trustees, will monitor the performance of the Investment Managers against their own benchmarks, and regularly review that each Investment Manager continues to carry out its work competently and has the appropriate knowledge and experience to manage the Scheme's assets.

As part of this review, the Trustees will consider whether or not each Investment Manager:

- Is carrying out its function competently. The Trustees will evaluate the Investment Manager based on, amongst other things:
 - The Investment Manager's performance versus its benchmark.
 - The level of risk within the portfolios given any specified risk tolerances.
 - The competitiveness of Investment Manager fees is reviewed on an annual basis.
- Has regard to the suitability of each investment and each category of investment.
- Has been exercising their powers of investment with a view to giving effect to the principles contained in this SIP, so far as is reasonably practical.
- If the Trustees are not satisfied with an Investment Manager they will ask the Investment Manager to take steps to rectify the situation. If the Investment Manager still does not meet the Trustees' requirements, the Trustees will remove the Investment Manager and appoint another.
- The Scheme invests in pooled funds, the duration of which is flexible, and the Trustees will from time-to-time consider the appropriateness of the fund range and whether they should continue to be held.
- The Trustees do not directly monitor turnover costs. However, the Investment Managers are incentivised to minimise costs as they are measured on a net of cost basis. The Investment Managers are required to provide transaction cost information on an annual basis, on the slippage cost methodology, for disclosure to members.
- The Trustees will evaluate and monitor the Investment Managers selected for their exercising of responsible investing activities, which will include voting and engagement, in respect of the Scheme's investment and in accordance with their stated or agreed policies and as may be further agreed with the Trustees.

Advisers

The Trustees will monitor the advice given by their advisers on a regular basis and assess them annually against the investment objectives that have been set in accordance with Part 2 of the Investment Consultancy and Fiduciary Management Market Investigation Order 2019.

Statement of Investment Principles

The Trustees will review this SIP at least triennially, or as soon as is practical following any changes to the investment strategy, and modify it with consultation from the relevant advisers, the Company, if deemed appropriate. There will be no obligation to change this SIP, any Investment Manager, Platform Manager, or adviser as part of such a review.

Trustees' Recordkeeping

The Trustees maintain a record of all investment related decisions they have taken, together with the rationale in each case.

7. Fees

Member Charges

There are three sources of charges applicable to members:

- Investment management charges
- Mobius platform charge
- Scheme platform charge (includes administration)

Fees are charged as a proportion of the size of assets invested. The charges have been negotiated and will continue to be reviewed regularly. Member charges are set out in each employer's Investment Choices document.

Advisers

Fees paid to the advisers are based either on actual time spent and hourly rates for relevant individuals or on fixed fees agreed in advance for specifically defined projects.

Value for Members

The Trustees review, as far as possible based on the data available, all sources of fees levied on members' accounts (including management charges, additional expenses and platform charges as appropriate) to ensure value for members is present. The Trustees consider, among other items, the absolute level of charges, the competitiveness of applicable charges relative to the marketplace and the levels of service provided by each of the advisers and Managers.

The Trustees also review, as far as is reasonable and practical, transaction costs paid by members to assess the extent to which these represent good value for money.

The Trustees' conclusions in respect of value for members are documented in the Scheme's annual report and accounts.

8.Risks

The Trustees recognise a number of key risks to themselves and to the members of the Scheme:

- a) Value for Members Risk – the risk that the Scheme fails to offer value for members. This is addressed through regular ‘value for members’ reviews.
- b) Inflation Risk – the risk that the purchasing power of members’ investment accounts is not maintained. To try to manage this risk, the Trustees have offered a range of funds reflecting asset classes expected to provide long term returns more than price inflation.
- c) Pension Purchase Risk – the risk that the value of pension benefits that can be purchased by a given defined contribution amount is not maintained. This risk cannot easily be mitigated as it depends on market conditions for annuity rates at retirement, and the default strategies target a flexible-access outcome to reflect that not all members will look to purchase an annuity at retirement. However, the default strategies gradually de-risk as members approach retirement, including an increased allocation to bonds which should provide an extent of annuity price matching. Bond funds are also available within the self-select fund range for those members who would like to hedge annuity price movements more explicitly.
- d) Capital Risk – the risk that the value of any element used to provide a cash sum at retirement is not maintained, and to try to mitigate this risk the default strategies de-risk as members approach retirement. The self-select fund range includes a cash fund option for members prioritising capital preservation.
- e) Passive Manager Risk – the risk that the passive investments do not track the index effectively. The Trustees have mitigated this risk by taking advice from their Investment Adviser in relation to passive investments. The Trustees monitor how effectively the Scheme’s passive investments track their benchmarks as part of ongoing investment governance.
- f) Active Manager Risk – the risk that the active investments underlying the Scheme’s investment options underperform due to the underlying investment manager underperformance. The Trustees have mitigated this risk by taking advice from its Investment Adviser in relation to active asset management. The Investment Adviser considers a wide range of funds; diversified across asset class, sub asset class and investment manager to reduce the active manager risk.
- g) Communication Risk – the risk that communication to members is misleading or unclear and leads to inappropriate decisions being made. This is addressed through the Trustees receiving advice from their advisers and regular monitoring and updates, where appropriate, of member communications.
- h) Inappropriate Member Decision – the risk that members make inappropriate decisions regarding their investments. This is addressed where possible through communication to members and the recommendation that members seek independent financial advice. The Trustees also offer default strategies with a “lifestyling element” designed to phase members into lower risk investments as they approach retirement.
- i) Organisational Risk – the risk of inadequate internal processes leading to problems for the Scheme. This is addressed through a regular monitoring of the Investment Managers and advisers.
- j) Liquidity Risk – the risk that members are not able to realise the value of their funds when required. The majority of funds the Trustees offer are daily dealt, however some of the underlying investments in the daily dealt funds may be less liquid (for example private market investments). In this case whilst the funds offered are usually daily dealing, there is a risk that the underlying funds may suspend investment or redemption requests in periods of extreme market volatility, however the Trustees seek to mitigate the

impact on members through regular assessment of the Scheme's inflows and outflows to ensure sufficient liquidity.

- k) ESG Risk – the risk of adverse performance due to ESG related factors including climate change. This is addressed by carrying out regular reviews of the investment managers' approaches and effectiveness in managing ESG risks.
- l) Other Risks – The Trustees do identify other risks including but not limited to political, regulatory, and market risks which are considered in the Investment Strategy and its execution and on-going monitoring. Many of these risks are monitored through a Risk Register which is maintained, and actions tracked on a routine basis in the governance of the Scheme.

The importance of each risk varies with time. Inflation is important throughout the whole period to retirement whereas pension purchase risk and capital risk become more significant as retirement approaches, depending on how the member chooses to access their pension saving at retirement.

The Trustees have provided default strategies that aim to address the above risks through a member's life. The Trustees may vary the underlying asset allocation and investment managers within these strategies from time to time in response to changing market conditions and manager developments.

The Trustees also provide members with a range of self-select investment options into which they may direct their contributions so as to allow each member to determine the appropriate mix of investments based on their own attitude to risk, terms to retirement and investment objective.

The Trustees recognise that an efficient process for identifying, evaluating, managing and monitoring risks needs to be in place for the Scheme. The Trustees will identify and assess the impact of any risk, what controls can be put in place to manage the risk and review both the individual risks and the effectiveness of the risk management process as a whole.

The Trustees will keep these risks and how they are managed under regular review.

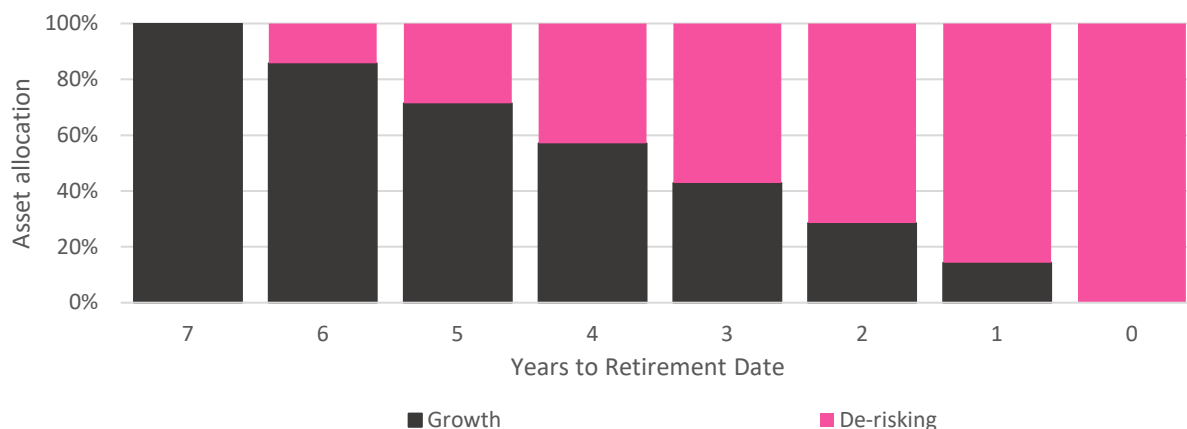
Appendix – Investment Options

The Cushon Sustainable Investment Strategy is the Trustees preferred default investment strategy that is offered in the Scheme. The Trustees and Company encourage Employers comfortable with the use of Private Markets within a default strategy to select this default strategy for members as they believe it will deliver the best risk-adjusted returns and therefore provide a better net of fees outcome for members.

The Trustees do offer an alternative default strategy, known as the Cushon Core Investment Strategy, for Employers wanting a lower cost strategy that does not incorporate Private Markets. Whilst it is not their preferred default strategy, the Trustees are comfortable that Cushon Core is an appropriate default to offer members.

Main Default Strategy: Cushon Sustainable Investment Strategy

For Employers that choose the Cushon Sustainable Investment Strategy, members who do not make a specific investment choice will be automatically invested in the Cushon Sustainable Investment Strategy. This phases a member's assets through different funds (set out in the chart below) as retirement approaches.



Main Default Strategy: Underlying Funds

Fund	Asset class	Target Allocation in Growth	Target Allocation in De-risking
Macquarie True Index	Equities	75%	40%
Schroders Capital Climate +	Private markets	15%	10%
Wellington Global Impact	Corporate Bonds	2.5%	6.25%
Lombard Odier Target Net Zero	Corporate Bonds	2.5%	6.25%
L&G Future World Corporate Bond Index	Corporate Bonds	1.8%	4.5%
Ninety One Global Target Return Credit	Multi Asset Credit	3.2%	8%
L&G Over 5 Year Index-Linked Gilts	Government Bonds	-	15%
L&G Cash	Cash	-	10%
Expected return		Gilts + 4.6% p.a.	Gilts + 3.4% p.a.
Expected volatility		17.7% p.a.	11.3% p.a.

Expected return and volatility numbers calculated at the time of setting the investment strategy and may vary over time depending on market conditions.

The allocations shown above represent the long-term targets to different funds. Actual allocations may differ, in particular where new funds, such as the Schroders Capital Climate + Fund, take time to reach their target allocation or they cannot be immediately bought and sold.

The growth fund aims to deliver a long-term return (net of fees) of CPI + 3.5% p.a. over rolling 5-year periods.

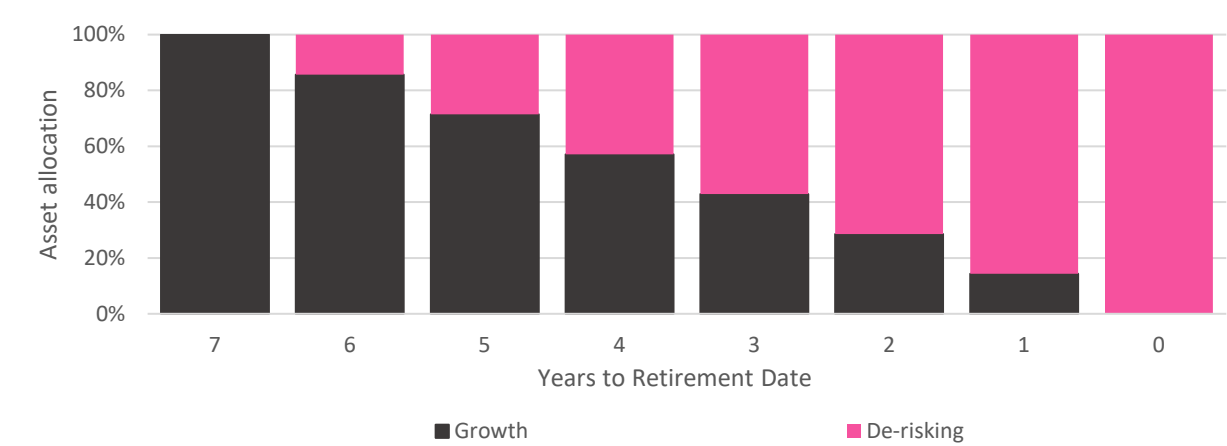
The de-risking element aims to deliver a long-term return (net of fees) of CPI + 1.5% p.a. over rolling 5-year periods.

For members on the Cushon platform, when a member accesses their pot, the member’s allocation to the Schroders Capital Climate + Fund is switched to the BlackRock Market Advantage Fund. All other asset allocations remain the same and the change in asset allocation as a member ages will remain as per previous. This is subject to member confirmation after accessing their pot that they are comfortable with this continuing or if not the alternative fund(s) they wish to invest in instead.

For members on the HS Pensions platform, when a member accesses their pot, they are offered the Alliance Bernstein Retirement Bridge funds. When a member chooses Retirement Bridge the pension fund is invested in target-date funds managed by Alliance Bernstein. These invest the member’s pot in a fund that corresponds to their date of birth or a stated target retirement date range of 2 years. The funds are made up of a collection of growth assets, such as equities, and income-producing assets, such as fixed income gilts, that are adjusted on a lifestyle basis as the member approaches age 75. The objective of the strategy is to produce a sustainable income at a level similar to that of a typical joint-life, level annuity, but one that is expected to grow over time.

Alternative Default Strategy: Cushon Core Investment Strategy

For Employers that choose the Cushon Core Investment Strategy, members who do not make a specific investment choice will be automatically invested in the Cushon Core Investment Strategy. This phases a member’s assets through different funds (set out in the chart below) as retirement approaches.



Alternative Default Strategy: Underlying Funds

Fund	Asset class	Target Allocation in Growth	Target Allocation in De-risking
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Macquarie True Index	Equities	90%	50%
Wellington Global Impact	Corporate Bonds	2.5%	6.25%
Lombard Odier Target Net Zero	Corporate Bonds	2.5%	6.25%
L&G Future World Corporate Bond Index	Corporate Bonds	1.8%	4.5%
Ninety One Global Target Return Credit	Multi Asset Credit	3.2%	8%
L&G Over 5 Year Index-Linked Gilts	Government Bonds	-	15%
L&G Cash	Cash	-	10%
Expected return		Gilts + 4.3% p.a.	Gilts + 3.3% p.a.
Expected volatility		18.4% p.a.	11.7% p.a.

Expected return and volatility numbers calculated at the time of setting the investment strategy and may vary over time depending on market conditions.

The allocations shown above represent the long-term targets to different funds. Actual allocations may differ, in particular where new funds take time to reach their target allocation.

The growth fund aims to deliver a long term return (net of fees) of CPI + 3.5% p.a. over rolling 5-year periods.

The de-risking element aims to deliver a long term return (net of fees) of CPI + 1.5% p.a. over rolling 5-year periods.

Default Strategies: Underlying Funds

Fund	Target Objective	Investment Style
Macquarie True Index	Deliver exact net returns of the Cushon Solactive ESG equity index for no management fee and a zero tracking error. The fund delivers an immediate CO2e emission reduction of 60% and an ongoing reduction of 7% per annum. Companies are screened for their alignment with the UN SDG and excludes the lowest performers. Companies with an SDG impact rating of less than - 5.1 are excluded. The fund's Green Revenue is increased by 100% and its Carbon Risk Rating by 20% compared to the benchmark.	Passive
Schroders Capital Climate + (Cushon Sustainable Investment Strategy only)	Net return of 8% p.a. with impact targets of 12.5k tCO2e avoided, 11k tCO2e captured, 300k people with increased climate risk resilience and less than 17.5k tCO2e generated per £10m invested.	Active
BlackRock Market Advantage (Post-Retirement only)	The fund aims to provide a return over the long-term (5 consecutive years) that exceeds 3 Month SONIA + 3.5% per annum (gross of fees).	Active
Wellington Global Impact Corporate Bonds	The fund targets 50bps gross outperformance p.a. versus the Bloomberg Barclays Global Aggregate Index (hedged to USD). The fund seeks to improve access to, and the quality of, basic life essentials reduce inequality and mitigate the effects of climate change.	Active
Lombard Odier Target Net Zero	The fund targets 100bps gross outperformance p.a. versus the Bloomberg Barclays Global Aggregate Corporate Bond Index over	Active

	a credit cycle. The fund targets a 50% reduction in CO2 emissions by 2030, and NetZero by 2050.	
L&G Future World GBP Corporate Bond Index	Track the performance of the Solactive L&G ESG GBP Investment Grade Corporate TR Index. The fund employs a passive index tracking strategy while reflecting significant environmental, social and corporate governance (ESG) issues. Companies that fail to meet LGIM's minimum standards in low carbon transition and corporate governance standards may be excluded from the fund.	Passive
Ninety One Global Total Return Credit	The fund targets SONIA + 4% per annum (gross of fees) over a full credit cycle (which may be measured over 5-year rolling periods). The fund uses an unconstrained, bottom-up investment approach, targeting the most efficient allocation of capital across the global credit universe. The fund employs a bottom-up sustainability framework to identify the best-in-class companies and align the portfolio with net zero while achieving an immediate emission reduction of more than 50% compared to its benchmark.	Active
L&G Over 5 Year Index-Linked Gilts	Track the performance of the FTSE Actuaries UK Index-Linked Gilts Over 5 Years Index to within +/-0.25% p.a. for two years out of three.	Passive
L&G Cash	Perform in line with SONIA (Sterling Overnight Index Average).	Active

Self-Select Fund Options

The self-select options allow members to choose from a selection of funds based on their own attitude to risk, term to retirement and investment objective. The funds that may be made available to members are set out below.

Fund	Underlying Fund	Target Objective	Investment Style
Cushon Sustainable Global Equity	L&G Future World Global Equity Index	Track the performance of the Solactive L&G ESG Global Markets Index.	Passive
Cushon Sustainable UK Equity	L&G Future World UK Equity Index	Track the performance of the Solactive L&G ESG UK Index.	Passive
Cushon Sustainable Europe (ex UK) Equity	L&G Future World Europe (ex UK) Equity Index	Track the performance of the Solactive L&G ESG Europe ex UK Index.	Passive
Cushon Sustainable Japanese Equity	L&G Future World Japan Equity Index	Track the performance of the Solactive L&G ESG Japan Index.	Passive
Cushon Sustainable North American Equity	L&G Future World North American Equity Index	Track the performance of the Solactive L&G ESG North America Index.	Passive
Cushon Sustainable Pacific ex Japan Equity	L&G Future World Asia Pacific (ex Japan) Equity Index	Track the performance of the Solactive L&G ESG Asia Pacific ex Japan Index.	Passive
Cushon Sustainable Emerging Market Equity	L&G Future World Emerging Markets Equity Index	Track the performance of the Solactive L&G ESG Emerging Markets Index.	Passive
Fund	Underlying Fund	Target Objective	Investment Style
Cushon Fixed Interest Gilts	L&G All Stocks Gilt Index	Track the performance of the FTSE Actuaries UK Conventional Gilts All Stocks Index.	Passive

Cushon Index-Linked Gilts	L&G All Stocks Index-Linked Gilts Index	Track the performance of the FTSE Actuaries UK Index-Linked Gilts All Stocks Index.	Passive
Cushon Sustainable UK Corporate Bonds	L&G Future World GBP Corporate Bond Index	Track the performance of the Solactive L&G ESG GBP Investment Grade Corporate TR Index	Passive
Cushon Cash	L&G Cash	Perform in line with SONIA (Sterling Overnight Index Average).	Active
Cushon Shariah	HSBC Islamic Global Equity Index	Track the performance of the Dow Jones Islamic Titans 100 Index.	Passive
Cushon Global Impact	Baillie Gifford Positive Change	Outperform the MSCI ACWI Index GBP (net of fees) by 2% p.a.	Active
Cushon Global Equity	Macquarie True index	Deliver exact net returns of the Cushon Solactive ESG equity index for no management fee and a zero tracking error.	Passive
Cushon Global Bonds	Wellington Impact Bond (25%), Lombard Odier Bond (25%), L&G (18%) & Ninety One (32%)	<p>Wellington: The fund targets 50bps gross outperformance p.a. versus the Bloomberg Barclays Global Aggregate Index (hedged to USD). The fund seeks to improve access to, and the quality of, basic life essentials reduce inequality and mitigate the effects of climate change.</p> <p>Lombard Odier: The fund targets 100bps gross outperformance p.a. versus the Bloomberg Barclays Global Aggregate Corporate Bond Index over a credit cycle. The fund targets a 50% reduction in CO2 emissions by 2030, and NetZero by 2050.</p> <p>L&G: Track the performance of the Solactive L&G ESG GBP Investment Grade Corporate TR Index.</p> <p>Ninety One: The fund targets SONIA + 4% gross of fees over a full credit cycle (which may be measured over 5-year rolling periods).</p>	Active

APPENDIX 2 – Cushon Sustainable Investment Strategy charges & net investment returns (Default Investment Strategy)

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	Net performance since inception to 31 December 2022 **
Cushon Sustainable Investment Strategy – Growth phase	0.20	0.009	0.209	0.0001	-2.62%
	0.25	0.009	0.259	0.0001	-2.64%
	0.29	0.009	0.299	0.0001	-2.66%
	0.30	0.009	0.309	0.0001	-2.66%
	0.31	0.009	0.319	0.0001	-2.67%
	0.32	0.009	0.329	0.0001	-2.67%
	0.34	0.009	0.349	0.0001	-2.68%
	0.34 & £2	0.009	0.349 & £2	0.0001	-2.68%
	0.37	0.009	0.379	0.0001	-2.69%
	0.38	0.009	0.389	0.0001	-2.70%
	0.39	0.009	0.399	0.0001	-2.70%
	0.40	0.009	0.409	0.0001	-2.70%
	0.42	0.009	0.429	0.0001	-2.71%
	0.44	0.009	0.449	0.0001	-2.72%
	0.45	0.009	0.459	0.0001	-2.73%
	0.46	0.009	0.459	0.0001	-2.73%
	0.47	0.009	0.479	0.0001	-2.73%
	0.49	0.009	0.499	0.0001	-2.74%
	0.49 & £1	0.009	0.499 & £1	0.0001	-2.74%
	0.50	0.009	0.509	0.0001	-2.75%
	0.51	0.009	0.519	0.0001	-2.75%
	0.52	0.009	0.529	0.0001	-2.75%
	0.55	0.009	0.559	0.0001	-2.77%
	0.60	0.009	0.609	0.0001	-2.79%

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	Net performance since inception to 31 December 2022 **
Cushon Sustainable Investment Strategy – Growth phase	0.60 & £0.83	0.009	0.609 & £0.83	0.0001	-2.79%
	0.65	0.009	0.659	0.0001	-2.81%
	0.69	0.009	0.699	0.0001	-2.82%
	0.72	0.009	0.729	0.0001	-2.84%
	0.75	0.009	*0.759	0.0001	-2.85%
	1.00	0.009	*1.009	0.0001	-2.95%
Cushon Sustainable Investment Strategy – Pre-retirement phase	0.20	0.0225	0.2225	0.0002	-5.73%
	0.25	0.0225	0.2725	0.0002	-5.75%
	0.29	0.0225	0.3125	0.0002	-5.77%
	0.30	0.0225	0.3225	0.0002	-5.77%
	0.31	0.0225	0.3325	0.0002	-5.77%
	0.32	0.0225	0.3425	0.0002	-5.78%
	0.34	0.0225	0.3625	0.0002	-5.79%
	0.34 & £2	0.0225	0.3625 & £2	0.0002	-5.79%
	0.37	0.0225	0.3925	0.0002	-5.80%
	0.38	0.0225	0.4025	0.0002	-5.80%
	0.39	0.0225	0.4125	0.0002	-5.81%
	0.40	0.0225	0.4225	0.0002	-5.81%
	0.42	0.0225	0.4425	0.0002	-5.82%
	0.44	0.0225	0.4625	0.0002	-5.83%
	0.45	0.0225	0.4725	0.0002	-5.83%
	0.46	0.0225	0.4825	0.0002	-5.84%
	0.47	0.0225	0.4925	0.0002	-5.84%
	0.49	0.0225	0.5125	0.0002	-5.85%
	0.49 & £1	0.0225	0.5125 & £1	0.0002	-5.85%

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	Net performance since inception to 31 December 2022
	0.50	0.0225	0.5225	0.0002	-5.85%
	0.51	0.0225	0.5325	0.0002	-5.86%
	0.52	0.0225	0.5425	0.0002	-5.86%
	0.55	0.0225	0.5725	0.0002	-5.87%
	0.60	0.0225	0.6225	0.0002	-5.89%
	0.60 & £0.83	0.0225	0.6225 & £0.83	0.0002	-5.89%
	0.65	0.0225	0.6725	0.0002	-5.91%
	0.69	0.0225	0.7125	0.0002	-5.93%
	0.72	0.0225	0.7425	0.0002	-5.94%
	0.75	0.0225	*0.7725	0.0002	-5.96%
	1.00	0.0225	*1.0225	0.0002	-6.06%

*This charging structure is not used for automatic enrolment purposes.

** Due to the platform move and the investment strategy move, the net performance since inception to 31 December 2022 of the Cushon Sustainable Investment Strategy - Growth phase is the age related returns for the lifestyle funds (split by fee class) for a 25 year old, 45 year old and 55 year old.

APPENDIX 3 – Self-select fund charges & net investment returns

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	Net performance since inception to 31 December 2022	12-month net return to 31 December 2022
Cushon Cash	0.140	0.00	0.140	0.0003	1.17%	1.16%
Cushon Cash	0.190	0.00	0.190	0.0003	1.10%	1.08%
Cushon Cash	0.230	0.00	0.230	0.0003	1.04%	1.02%
Cushon Cash	0.240	0.00	0.240	0.0003	1.02%	1.00%
Cushon Cash	0.250	0.00	0.250	0.0003	1.01%	0.99%
Cushon Cash	0.260	0.00	0.260	0.0003	0.99%	0.97%
Cushon Cash	0.280	0.00	0.280	0.0003	0.96%	0.94%
Cushon Cash	0.310	0.00	0.310	0.0003	0.92%	0.90%
Cushon Cash	0.320	0.00	0.320	0.0003	0.90%	0.88%
Cushon Cash	0.330	0.00	0.330	0.0003	0.89%	0.87%
Cushon Cash	0.340	0.00	0.340	0.0003	0.87%	0.85%
Cushon Cash	0.360	0.00	0.360	0.0003	0.84%	0.82%
Cushon Cash	0.380	0.00	0.380	0.0003	0.81%	0.79%
Cushon Cash	0.390	0.00	0.390	0.0003	0.79%	0.78%
Cushon Cash	0.400	0.00	0.400	0.0003	0.78%	0.76%
Cushon Cash	0.410	0.00	0.410	0.0003	0.76%	0.75%
Cushon Cash	0.430	0.00	0.430	0.0003	0.73%	0.71%
Cushon Cash	0.440	0.00	0.440	0.0003	0.72%	0.70%
Cushon Cash	0.450	0.00	0.450	0.0003	0.70%	0.68%
Cushon Cash	0.460	0.00	0.460	0.0003	0.69%	0.67%
Cushon Cash	0.490	0.00	0.490	0.0003	0.64%	0.62%
Cushon Cash	0.540	0.00	0.540	0.0003	0.57%	0.55%
Cushon Cash	0.590	0.00	0.590	0.0003	0.49%	0.47%
Cushon Cash	0.630	0.00	0.630	0.0003	0.43%	0.41%
Cushon Cash	0.660	0.00	0.660	0.0003	0.38%	0.37%
Cushon Cash	0.690	0.00	0.690	0.0003	0.34%	0.32%
Cushon Cash	0.940	0.00	0.940	0.0003	-0.04%	-0.06%

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	Net performance since inception to 31 December 2022	12-month net return to 31 December 2022
Cushon Fixed Interest Gilts	0.128	0.00	0.128	0.0000	-23.91%	-24.28%
Cushon Fixed Interest Gilts	0.178	0.00	0.178	0.0000	-23.99%	-24.36%
Cushon Fixed Interest Gilts	0.218	0.00	0.218	0.0000	-24.05%	-24.42%
Cushon Fixed Interest Gilts	0.228	0.00	0.228	0.0000	-24.06%	-24.43%
Cushon Fixed Interest Gilts	0.238	0.00	0.238	0.0000	-24.08%	-24.45%
Cushon Fixed Interest Gilts	0.248	0.00	0.248	0.0000	-24.09%	-24.46%
Cushon Fixed Interest Gilts	0.268	0.00	0.268	0.0000	-24.12%	-24.49%
Cushon Fixed Interest Gilts	0.298	0.00	0.298	0.0000	-24.17%	-24.54%
Cushon Fixed Interest Gilts	0.308	0.00	0.308	0.0000	-24.18%	-24.55%
Cushon Fixed Interest Gilts	0.318	0.00	0.318	0.0000	-24.20%	-24.57%
Cushon Fixed Interest Gilts	0.328	0.00	0.328	0.0000	-24.21%	-24.58%
Cushon Fixed Interest Gilts	0.348	0.00	0.348	0.0000	-24.24%	-24.61%
Cushon Fixed Interest Gilts	0.368	0.00	0.368	0.0000	-24.27%	-24.65%
Cushon Fixed Interest Gilts	0.378	0.00	0.378	0.0000	-24.29%	-24.66%
Cushon Fixed Interest Gilts	0.388	0.00	0.388	0.0000	-24.31%	-24.68%
Cushon Fixed Interest Gilts	0.398	0.00	0.398	0.0000	-24.32%	-24.69%
Cushon Fixed Interest Gilts	0.418	0.00	0.418	0.0000	-24.35%	-24.72%
Cushon Fixed Interest Gilts	0.428	0.00	0.428	0.0000	-24.37%	-24.74%
Cushon Fixed Interest Gilts	0.438	0.00	0.438	0.0000	-24.38%	-24.75%
Cushon Fixed Interest Gilts	0.448	0.00	0.448	0.0000	-24.40%	-24.77%
Cushon Fixed Interest Gilts	0.478	0.00	0.478	0.0000	-24.44%	-24.81%
Cushon Fixed Interest Gilts	0.528	0.00	0.528	0.0000	-24.52%	-24.89%
Cushon Fixed Interest Gilts	0.578	0.00	0.578	0.0000	-24.59%	-24.96%
Cushon Fixed Interest Gilts	0.618	0.00	0.618	0.0000	-24.65%	-25.02%
Cushon Fixed Interest Gilts	0.648	0.00	0.648	0.0000	-24.70%	-25.07%
Cushon Fixed Interest Gilts	0.678	0.00	0.678	0.0000	-24.75%	-25.12%
Cushon Fixed Interest Gilts	0.928	0.00	0.928	0.0000	-25.13%	-25.50%

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	Net performance since inception to 31 December 2022	12-month net return to 31 December 2022
Cushon Global Impact	0.490	0.03	0.520	-0.0009	-21.69%	-21.93%
Cushon Global Impact	0.540	0.03	0.570	-0.0009	-21.76%	-22.01%
Cushon Global Impact	0.580	0.03	0.610	-0.0009	-21.82%	-22.07%
Cushon Global Impact	0.590	0.03	0.620	-0.0009	-21.84%	-22.08%
Cushon Global Impact	0.600	0.03	0.630	-0.0009	-21.85%	-22.10%
Cushon Global Impact	0.610	0.03	0.640	-0.0009	-21.87%	-22.11%
Cushon Global Impact	0.630	0.03	0.660	-0.0009	-21.90%	-22.14%
Cushon Global Impact	0.660	0.03	0.690	-0.0009	-21.94%	-22.19%
Cushon Global Impact	0.670	0.03	0.700	-0.0009	-21.96%	-22.20%
Cushon Global Impact	0.680	0.03	0.710	-0.0009	-21.97%	-22.22%
Cushon Global Impact	0.690	0.03	0.720	-0.0009	-21.99%	-22.23%
Cushon Global Impact	0.710	0.03	0.740	-0.0009	-22.02%	-22.27%
Cushon Global Impact	0.730	0.03	0.760	-0.0009	-22.05%	-22.30%
Cushon Global Impact	0.740	0.03	0.770	-0.0009	-22.07%	-22.31%
Cushon Global Impact	0.750	0.03	0.780	-0.0009	-22.08%	-22.33%
Cushon Global Impact	0.760	0.03	0.790	-0.0009	-22.10%	-22.34%
Cushon Global Impact	0.780	0.03	0.810	-0.0009	-22.13%	-22.37%
Cushon Global Impact	0.790	0.03	0.820	-0.0009	-22.14%	-22.39%
Cushon Global Impact	0.800	0.03	0.830	-0.0009	-22.16%	-22.40%
Cushon Global Impact	0.810	0.03	0.840	-0.0009	-22.17%	-22.42%
Cushon Global Impact	0.840	0.03	0.870	-0.0009	-22.22%	-22.46%
Cushon Global Impact	0.890	0.03	0.920	-0.0009	-22.29%	-22.54%
Cushon Global Impact	0.940	0.03	0.970	-0.0009	-22.37%	-22.61%
Cushon Global Impact	0.980	0.03	1.010	-0.0009	-22.43%	-22.68%
Cushon Global Impact	1.010	0.03	1.040	-0.0009	-22.48%	-22.72%
Cushon Global Impact	1.040	0.03	1.070	-0.0009	-22.52%	-22.77%
Cushon Global Impact	1.290	0.03	1.320	-0.0009	-22.90%	-23.15%

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	Net performance since inception to 31 December 2022	12-month net return to 31 December 2022
Cushon Index-Linked Gilts	0.128	0.00	0.128	0.0005	-30.15%	-34.48%
Cushon Index-Linked Gilts	0.178	0.00	0.178	0.0005	-30.23%	-34.56%
Cushon Index-Linked Gilts	0.218	0.00	0.218	0.0005	-30.29%	-34.62%
Cushon Index-Linked Gilts	0.228	0.00	0.228	0.0005	-30.30%	-34.64%
Cushon Index-Linked Gilts	0.238	0.00	0.238	0.0005	-30.32%	-34.65%
Cushon Index-Linked Gilts	0.248	0.00	0.248	0.0005	-30.34%	-34.67%
Cushon Index-Linked Gilts	0.268	0.00	0.268	0.0005	-30.37%	-34.70%
Cushon Index-Linked Gilts	0.298	0.00	0.298	0.0005	-30.41%	-34.74%
Cushon Index-Linked Gilts	0.308	0.00	0.308	0.0005	-30.43%	-34.76%
Cushon Index-Linked Gilts	0.318	0.00	0.318	0.0005	-30.44%	-34.77%
Cushon Index-Linked Gilts	0.328	0.00	0.328	0.0005	-30.46%	-34.79%
Cushon Index-Linked Gilts	0.348	0.00	0.348	0.0005	-30.49%	-34.82%
Cushon Index-Linked Gilts	0.368	0.00	0.368	0.0005	-30.52%	-34.85%
Cushon Index-Linked Gilts	0.378	0.00	0.378	0.0005	-30.53%	-34.86%
Cushon Index-Linked Gilts	0.388	0.00	0.388	0.0005	-30.55%	-34.88%
Cushon Index-Linked Gilts	0.398	0.00	0.398	0.0005	-30.56%	-34.89%
Cushon Index-Linked Gilts	0.418	0.00	0.418	0.0005	-30.59%	-34.92%
Cushon Index-Linked Gilts	0.428	0.00	0.428	0.0005	-30.61%	-34.94%
Cushon Index-Linked Gilts	0.438	0.00	0.438	0.0005	-30.62%	-34.95%
Cushon Index-Linked Gilts	0.448	0.00	0.448	0.0005	-30.64%	-34.97%
Cushon Index-Linked Gilts	0.478	0.00	0.478	0.0005	-30.68%	-35.02%
Cushon Index-Linked Gilts	0.528	0.00	0.528	0.0005	-30.76%	-35.09%
Cushon Index-Linked Gilts	0.578	0.00	0.578	0.0005	-30.84%	-35.17%
Cushon Index-Linked Gilts	0.618	0.00	0.618	0.0005	-30.90%	-35.23%
Cushon Index-Linked Gilts	0.648	0.00	0.648	0.0005	-30.94%	-35.27%
Cushon Index-Linked Gilts	0.678	0.00	0.678	0.0005	-30.99%	-35.32%
Cushon Index-Linked Gilts	0.928	0.00	0.928	0.0005	-31.37%	-35.70%

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	Net performance since inception to 31 December 2022	12-month net return to 31 December 2022
Cushon Shariah	0.390	0.00	0.390	0.0000	-3.64%	-16.13%
Cushon Shariah	0.440	0.00	0.440	0.0000	-3.72%	-16.20%
Cushon Shariah	0.480	0.00	0.480	0.0000	-3.78%	-16.26%
Cushon Shariah	0.490	0.00	0.490	0.0000	-3.79%	-16.28%
Cushon Shariah	0.500	0.00	0.500	0.0000	-3.81%	-16.29%
Cushon Shariah	0.510	0.00	0.510	0.0000	-3.83%	-16.31%
Cushon Shariah	0.530	0.00	0.530	0.0000	-3.86%	-16.34%
Cushon Shariah	0.560	0.00	0.560	0.0000	-3.90%	-16.39%
Cushon Shariah	0.570	0.00	0.570	0.0000	-3.92%	-16.40%
Cushon Shariah	0.580	0.00	0.580	0.0000	-3.93%	-16.42%
Cushon Shariah	0.590	0.00	0.590	0.0000	-3.95%	-16.43%
Cushon Shariah	0.610	0.00	0.610	0.0000	-3.98%	-16.46%
Cushon Shariah	0.630	0.00	0.630	0.0000	-4.01%	-16.49%
Cushon Shariah	0.640	0.00	0.640	0.0000	-4.02%	-16.51%
Cushon Shariah	0.650	0.00	0.650	0.0000	-4.04%	-16.52%
Cushon Shariah	0.660	0.00	0.660	0.0000	-4.05%	-16.54%
Cushon Shariah	0.680	0.00	0.680	0.0000	-4.08%	-16.57%
Cushon Shariah	0.690	0.00	0.690	0.0000	-4.10%	-16.58%
Cushon Shariah	0.700	0.00	0.700	0.0000	-4.11%	-16.60%
Cushon Shariah	0.710	0.00	0.710	0.0000	-4.13%	-16.61%
Cushon Shariah	0.740	0.00	0.740	0.0000	-4.17%	-16.66%
Cushon Shariah	0.790	0.00	0.790	0.0000	-4.25%	-16.73%
Cushon Shariah	0.840	0.00	0.840	0.0000	-4.33%	-16.81%
Cushon Shariah	0.880	0.00	0.880	0.0000	-4.39%	-16.87%
Cushon Shariah	0.910	0.00	0.910	0.0000	-4.43%	-16.92%
Cushon Shariah	0.940	0.00	0.940	0.0000	-4.48%	-16.96%
Cushon Shariah	1.190	0.00	1.190	0.0000	-4.86%	-17.34%

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	Net performance since inception to 31 December 2022	12-month net return to 31 December 2022
Cushon Sustainable Emerging Market Equity	0.340	0.00	0.340	0.0015	-14.43%	-8.80%
Cushon Sustainable Emerging Market Equity	0.390	0.00	0.390	0.0015	-14.50%	-8.88%
Cushon Sustainable Emerging Market Equity	0.430	0.00	0.430	0.0015	-14.56%	-8.94%
Cushon Sustainable Emerging Market Equity	0.440	0.00	0.440	0.0015	-14.58%	-8.95%
Cushon Sustainable Emerging Market Equity	0.450	0.00	0.450	0.0015	-14.59%	-8.97%
Cushon Sustainable Emerging Market Equity	0.460	0.00	0.460	0.0015	-14.61%	-8.98%
Cushon Sustainable Emerging Market Equity	0.480	0.00	0.480	0.0015	-14.64%	-9.01%
Cushon Sustainable Emerging Market Equity	0.510	0.00	0.510	0.0015	-14.69%	-9.06%
Cushon Sustainable Emerging Market Equity	0.520	0.00	0.520	0.0015	-14.70%	-9.07%
Cushon Sustainable Emerging Market Equity	0.530	0.00	0.530	0.0015	-14.72%	-9.09%
Cushon Sustainable Emerging Market Equity	0.540	0.00	0.540	0.0015	-14.73%	-9.10%
Cushon Sustainable Emerging Market Equity	0.560	0.00	0.560	0.0015	-14.76%	-9.13%
Cushon Sustainable Emerging Market Equity	0.580	0.00	0.580	0.0015	-14.79%	-9.17%
Cushon Sustainable Emerging Market Equity	0.590	0.00	0.590	0.0015	-14.81%	-9.18%
Cushon Sustainable Emerging Market Equity	0.600	0.00	0.600	0.0015	-14.82%	-9.20%
Cushon Sustainable Emerging Market Equity	0.610	0.00	0.610	0.0015	-14.84%	-9.21%
Cushon Sustainable Emerging Market Equity	0.630	0.00	0.630	0.0015	-14.87%	-9.24%
Cushon Sustainable Emerging Market Equity	0.640	0.00	0.640	0.0015	-14.88%	-9.26%
Cushon Sustainable Emerging Market Equity	0.650	0.00	0.650	0.0015	-14.90%	-9.27%
Cushon Sustainable Emerging Market Equity	0.660	0.00	0.660	0.0015	-14.91%	-9.29%
Cushon Sustainable Emerging Market Equity	0.690	0.00	0.690	0.0015	-14.96%	-9.33%
Cushon Sustainable Emerging Market Equity	0.740	0.00	0.740	0.0015	-15.03%	-9.41%
Cushon Sustainable Emerging Market Equity	0.790	0.00	0.790	0.0015	-15.11%	-9.48%
Cushon Sustainable Emerging Market Equity	0.830	0.00	0.830	0.0015	-15.17%	-9.55%
Cushon Sustainable Emerging Market Equity	0.860	0.00	0.860	0.0015	-15.22%	-9.59%
Cushon Sustainable Emerging Market Equity	0.890	0.00	0.890	0.0015	-15.26%	-9.64%
Cushon Sustainable Emerging Market Equity	1.140	0.00	1.140	0.0015	-15.64%	-10.02%

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	Net performance since inception to 31 December 2022	12-month net return to 31 December 2022
Cushon Sustainable Europe (ex UK) Equity	0.193	0.00	0.193	-0.0003	-2.32%	-7.47%
Cushon Sustainable Europe (ex UK) Equity	0.243	0.00	0.243	-0.0003	-2.40%	-7.55%
Cushon Sustainable Europe (ex UK) Equity	0.283	0.00	0.283	-0.0003	-2.46%	-7.61%
Cushon Sustainable Europe (ex UK) Equity	0.293	0.00	0.293	-0.0003	-2.48%	-7.63%
Cushon Sustainable Europe (ex UK) Equity	0.303	0.00	0.303	-0.0003	-2.49%	-7.64%
Cushon Sustainable Europe (ex UK) Equity	0.313	0.00	0.313	-0.0003	-2.51%	-7.66%
Cushon Sustainable Europe (ex UK) Equity	0.333	0.00	0.333	-0.0003	-2.54%	-7.69%
Cushon Sustainable Europe (ex UK) Equity	0.363	0.00	0.363	-0.0003	-2.58%	-7.73%
Cushon Sustainable Europe (ex UK) Equity	0.373	0.00	0.373	-0.0003	-2.60%	-7.75%
Cushon Sustainable Europe (ex UK) Equity	0.383	0.00	0.383	-0.0003	-2.61%	-7.76%
Cushon Sustainable Europe (ex UK) Equity	0.393	0.00	0.393	-0.0003	-2.63%	-7.78%
Cushon Sustainable Europe (ex UK) Equity	0.413	0.00	0.413	-0.0003	-2.66%	-7.81%
Cushon Sustainable Europe (ex UK) Equity	0.433	0.00	0.433	-0.0003	-2.69%	-7.84%
Cushon Sustainable Europe (ex UK) Equity	0.443	0.00	0.443	-0.0003	-2.70%	-7.85%
Cushon Sustainable Europe (ex UK) Equity	0.453	0.00	0.453	-0.0003	-2.72%	-7.87%
Cushon Sustainable Europe (ex UK) Equity	0.463	0.00	0.463	-0.0003	-2.73%	-7.88%
Cushon Sustainable Europe (ex UK) Equity	0.483	0.00	0.483	-0.0003	-2.76%	-7.91%
Cushon Sustainable Europe (ex UK) Equity	0.493	0.00	0.493	-0.0003	-2.78%	-7.93%
Cushon Sustainable Europe (ex UK) Equity	0.503	0.00	0.503	-0.0003	-2.80%	-7.95%
Cushon Sustainable Europe (ex UK) Equity	0.513	0.00	0.513	-0.0003	-2.81%	-7.96%
Cushon Sustainable Europe (ex UK) Equity	0.543	0.00	0.543	-0.0003	-2.86%	-8.01%
Cushon Sustainable Europe (ex UK) Equity	0.593	0.00	0.593	-0.0003	-2.93%	-8.08%
Cushon Sustainable Europe (ex UK) Equity	0.643	0.00	0.643	-0.0003	-3.01%	-8.16%
Cushon Sustainable Europe (ex UK) Equity	0.683	0.00	0.683	-0.0003	-3.07%	-8.22%
Cushon Sustainable Europe (ex UK) Equity	0.713	0.00	0.713	-0.0003	-3.11%	-8.26%
Cushon Sustainable Europe (ex UK) Equity	0.743	0.00	0.743	-0.0003	-3.16%	-8.31%
Cushon Sustainable Europe (ex UK) Equity	0.993	0.00	0.993	-0.0003	-3.54%	-8.69%

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	Net performance since inception to 31 December 2022	12-month net return to 31 December 2022
Cushon Sustainable Global Equity	0.185	0.00	0.185	0.0012	-2.36%	-9.74%
Cushon Sustainable Global Equity	0.235	0.00	0.235	0.0012	-2.43%	-9.81%
Cushon Sustainable Global Equity	0.275	0.00	0.275	0.0012	-2.49%	-9.87%
Cushon Sustainable Global Equity	0.285	0.00	0.285	0.0012	-2.51%	-9.89%
Cushon Sustainable Global Equity	0.295	0.00	0.295	0.0012	-2.52%	-9.90%
Cushon Sustainable Global Equity	0.305	0.00	0.305	0.0012	-2.54%	-9.92%
Cushon Sustainable Global Equity	0.325	0.00	0.325	0.0012	-2.57%	-9.95%
Cushon Sustainable Global Equity	0.355	0.00	0.355	0.0012	-2.62%	-9.99%
Cushon Sustainable Global Equity	0.365	0.00	0.365	0.0012	-2.63%	-10.01%
Cushon Sustainable Global Equity	0.375	0.00	0.375	0.0012	-2.65%	-10.02%
Cushon Sustainable Global Equity	0.385	0.00	0.385	0.0012	-2.66%	-10.04%
Cushon Sustainable Global Equity	0.405	0.00	0.405	0.0012	-2.69%	-10.07%
Cushon Sustainable Global Equity	0.425	0.00	0.425	0.0012	-2.72%	-10.10%
Cushon Sustainable Global Equity	0.435	0.00	0.435	0.0012	-2.74%	-10.12%
Cushon Sustainable Global Equity	0.445	0.00	0.445	0.0012	-2.75%	-10.13%
Cushon Sustainable Global Equity	0.455	0.00	0.455	0.0012	-2.77%	-10.15%
Cushon Sustainable Global Equity	0.475	0.00	0.475	0.0012	-2.80%	-10.18%
Cushon Sustainable Global Equity	0.485	0.00	0.485	0.0012	-2.81%	-10.19%
Cushon Sustainable Global Equity	0.495	0.00	0.495	0.0012	-2.83%	-10.21%
Cushon Sustainable Global Equity	0.505	0.00	0.505	0.0012	-2.84%	-10.22%
Cushon Sustainable Global Equity	0.535	0.00	0.535	0.0012	-2.89%	-10.27%
Cushon Sustainable Global Equity	0.585	0.00	0.585	0.0012	-2.96%	-10.34%
Cushon Sustainable Global Equity	0.635	0.00	0.635	0.0012	-3.04%	-10.42%
Cushon Sustainable Global Equity	0.675	0.00	0.675	0.0012	-3.10%	-10.48%
Cushon Sustainable Global Equity	0.705	0.00	0.705	0.0012	-3.15%	-10.53%
Cushon Sustainable Global Equity	0.735	0.00	0.735	0.0012	-3.19%	-10.57%
Cushon Sustainable Global Equity	0.985	0.00	0.985	0.0012	-3.57%	-10.95%

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	Net performance since inception to 31 December 2022	12-month net return to 31 December 2022
Cushon Sustainable Japanese Equity	0.193	0.00	0.193	0.0006	-5.38%	-7.27%
Cushon Sustainable Japanese Equity	0.243	0.00	0.243	0.0006	-5.46%	-7.34%
Cushon Sustainable Japanese Equity	0.283	0.00	0.283	0.0006	-5.52%	-7.40%
Cushon Sustainable Japanese Equity	0.293	0.00	0.293	0.0006	-5.53%	-7.42%
Cushon Sustainable Japanese Equity	0.303	0.00	0.303	0.0006	-5.55%	-7.43%
Cushon Sustainable Japanese Equity	0.313	0.00	0.313	0.0006	-5.56%	-7.45%
Cushon Sustainable Japanese Equity	0.333	0.00	0.333	0.0006	-5.59%	-7.48%
Cushon Sustainable Japanese Equity	0.363	0.00	0.363	0.0006	-5.64%	-7.53%
Cushon Sustainable Japanese Equity	0.373	0.00	0.373	0.0006	-5.65%	-7.54%
Cushon Sustainable Japanese Equity	0.383	0.00	0.383	0.0006	-5.67%	-7.56%
Cushon Sustainable Japanese Equity	0.393	0.00	0.393	0.0006	-5.68%	-7.57%
Cushon Sustainable Japanese Equity	0.413	0.00	0.413	0.0006	-5.71%	-7.60%
Cushon Sustainable Japanese Equity	0.433	0.00	0.433	0.0006	-5.74%	-7.63%
Cushon Sustainable Japanese Equity	0.443	0.00	0.443	0.0006	-5.76%	-7.65%
Cushon Sustainable Japanese Equity	0.453	0.00	0.453	0.0006	-5.77%	-7.66%
Cushon Sustainable Japanese Equity	0.463	0.00	0.463	0.0006	-5.79%	-7.68%
Cushon Sustainable Japanese Equity	0.483	0.00	0.483	0.0006	-5.82%	-7.71%
Cushon Sustainable Japanese Equity	0.493	0.00	0.493	0.0006	-5.84%	-7.72%
Cushon Sustainable Japanese Equity	0.503	0.00	0.503	0.0006	-5.85%	-7.74%
Cushon Sustainable Japanese Equity	0.513	0.00	0.513	0.0006	-5.87%	-7.75%
Cushon Sustainable Japanese Equity	0.543	0.00	0.543	0.0006	-5.91%	-7.80%
Cushon Sustainable Japanese Equity	0.593	0.00	0.593	0.0006	-5.99%	-7.87%
Cushon Sustainable Japanese Equity	0.643	0.00	0.643	0.0006	-6.06%	-7.95%
Cushon Sustainable Japanese Equity	0.683	0.00	0.683	0.0006	-6.12%	-8.01%
Cushon Sustainable Japanese Equity	0.713	0.00	0.713	0.0006	-6.17%	-8.06%
Cushon Sustainable Japanese Equity	0.743	0.00	0.743	0.0006	-6.22%	-8.10%
Cushon Sustainable Japanese Equity	0.993	0.00	0.993	0.0006	-6.60%	-8.48%

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	Net performance since inception to 31 December 2022	12-month net return to 31 December 2022
Cushon Sustainable North American Equity	0.193	0.00	0.193	-0.0004	0.48%	-11.66%
Cushon Sustainable North American Equity	0.243	0.00	0.243	-0.0004	0.40%	-11.73%
Cushon Sustainable North American Equity	0.283	0.00	0.283	-0.0004	0.34%	-11.79%
Cushon Sustainable North American Equity	0.293	0.00	0.293	-0.0004	0.32%	-11.81%
Cushon Sustainable North American Equity	0.303	0.00	0.303	-0.0004	0.31%	-11.83%
Cushon Sustainable North American Equity	0.313	0.00	0.313	-0.0004	0.29%	-11.84%
Cushon Sustainable North American Equity	0.333	0.00	0.333	-0.0004	0.26%	-11.87%
Cushon Sustainable North American Equity	0.363	0.00	0.363	-0.0004	0.22%	-11.92%
Cushon Sustainable North American Equity	0.373	0.00	0.373	-0.0004	0.20%	-11.93%
Cushon Sustainable North American Equity	0.383	0.00	0.383	-0.0004	0.19%	-11.95%
Cushon Sustainable North American Equity	0.393	0.00	0.393	-0.0004	0.17%	-11.96%
Cushon Sustainable North American Equity	0.413	0.00	0.413	-0.0004	0.14%	-11.99%
Cushon Sustainable North American Equity	0.433	0.00	0.433	-0.0004	0.11%	-12.02%
Cushon Sustainable North American Equity	0.443	0.00	0.443	-0.0004	0.10%	-12.04%
Cushon Sustainable North American Equity	0.453	0.00	0.453	-0.0004	0.08%	-12.05%
Cushon Sustainable North American Equity	0.463	0.00	0.463	-0.0004	0.07%	-12.07%
Cushon Sustainable North American Equity	0.483	0.00	0.483	-0.0004	0.04%	-12.10%
Cushon Sustainable North American Equity	0.493	0.00	0.493	-0.0004	0.02%	-12.11%
Cushon Sustainable North American Equity	0.503	0.00	0.503	-0.0004	0.00%	-12.13%
Cushon Sustainable North American Equity	0.513	0.00	0.513	-0.0004	-0.01%	-12.14%
Cushon Sustainable North American Equity	0.543	0.00	0.543	-0.0004	-0.06%	-12.19%
Cushon Sustainable North American Equity	0.593	0.00	0.593	-0.0004	-0.13%	-12.27%
Cushon Sustainable North American Equity	0.643	0.00	0.643	-0.0004	-0.21%	-12.34%
Cushon Sustainable North American Equity	0.683	0.00	0.683	-0.0004	-0.27%	-12.40%
Cushon Sustainable North American Equity	0.713	0.00	0.713	-0.0004	-0.31%	-12.45%
Cushon Sustainable North American Equity	0.743	0.00	0.743	-0.0004	-0.36%	-12.49%
Cushon Sustainable North American Equity	0.993	0.00	0.993	-0.0004	-0.74%	-12.87%

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	Net performance since inception to 31 December 2022	12-month net return to 31 December 2022
Cushon Sustainable Pacific ex Japan Equity	0.193	0.00	0.193	0.0021	4.40%	5.44%
Cushon Sustainable Pacific ex Japan Equity	0.243	0.00	0.243	0.0021	4.32%	5.36%
Cushon Sustainable Pacific ex Japan Equity	0.283	0.00	0.283	0.0021	4.26%	5.30%
Cushon Sustainable Pacific ex Japan Equity	0.293	0.00	0.293	0.0021	4.25%	5.28%
Cushon Sustainable Pacific ex Japan Equity	0.303	0.00	0.303	0.0021	4.23%	5.27%
Cushon Sustainable Pacific ex Japan Equity	0.313	0.00	0.313	0.0021	4.22%	5.25%
Cushon Sustainable Pacific ex Japan Equity	0.333	0.00	0.333	0.0021	4.19%	5.22%
Cushon Sustainable Pacific ex Japan Equity	0.363	0.00	0.363	0.0021	4.14%	5.18%
Cushon Sustainable Pacific ex Japan Equity	0.373	0.00	0.373	0.0021	4.13%	5.16%
Cushon Sustainable Pacific ex Japan Equity	0.383	0.00	0.383	0.0021	4.11%	5.15%
Cushon Sustainable Pacific ex Japan Equity	0.393	0.00	0.393	0.0021	4.10%	5.13%
Cushon Sustainable Pacific ex Japan Equity	0.413	0.00	0.413	0.0021	4.07%	5.10%
Cushon Sustainable Pacific ex Japan Equity	0.433	0.00	0.433	0.0021	4.04%	5.07%
Cushon Sustainable Pacific ex Japan Equity	0.443	0.00	0.443	0.0021	4.02%	5.06%
Cushon Sustainable Pacific ex Japan Equity	0.453	0.00	0.453	0.0021	4.00%	5.04%
Cushon Sustainable Pacific ex Japan Equity	0.463	0.00	0.463	0.0021	3.99%	5.03%
Cushon Sustainable Pacific ex Japan Equity	0.483	0.00	0.483	0.0021	3.96%	4.99%
Cushon Sustainable Pacific ex Japan Equity	0.493	0.00	0.493	0.0021	3.94%	4.98%
Cushon Sustainable Pacific ex Japan Equity	0.503	0.00	0.503	0.0021	3.93%	4.96%
Cushon Sustainable Pacific ex Japan Equity	0.513	0.00	0.513	0.0021	3.91%	4.95%
Cushon Sustainable Pacific ex Japan Equity	0.543	0.00	0.543	0.0021	3.87%	4.90%
Cushon Sustainable Pacific ex Japan Equity	0.593	0.00	0.593	0.0021	3.79%	4.83%
Cushon Sustainable Pacific ex Japan Equity	0.643	0.00	0.643	0.0021	3.72%	4.75%
Cushon Sustainable Pacific ex Japan Equity	0.683	0.00	0.683	0.0021	3.66%	4.69%
Cushon Sustainable Pacific ex Japan Equity	0.713	0.00	0.713	0.0021	3.61%	4.65%
Cushon Sustainable Pacific ex Japan Equity	0.743	0.00	0.743	0.0021	3.56%	4.60%
Cushon Sustainable Pacific ex Japan Equity	0.993	0.00	0.993	0.0021	3.18%	4.22%

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	Net performance since inception to 31 December 2022	12-month net return to 31 December 2022
Cushon Sustainable UK Corporate Bonds	0.175	0.00	0.175	0.0000	-19.61%	-
Cushon Sustainable UK Corporate Bonds	0.225	0.00	0.225	0.0000	-19.68%	-
Cushon Sustainable UK Corporate Bonds	0.265	0.00	0.265	0.0000	-19.74%	-
Cushon Sustainable UK Corporate Bonds	0.275	0.00	0.275	0.0000	-19.76%	-
Cushon Sustainable UK Corporate Bonds	0.285	0.00	0.285	0.0000	-19.77%	-
Cushon Sustainable UK Corporate Bonds	0.295	0.00	0.295	0.0000	-19.79%	-
Cushon Sustainable UK Corporate Bonds	0.315	0.00	0.315	0.0000	-19.82%	-
Cushon Sustainable UK Corporate Bonds	0.345	0.00	0.345	0.0000	-19.86%	-
Cushon Sustainable UK Corporate Bonds	0.355	0.00	0.355	0.0000	-19.88%	-
Cushon Sustainable UK Corporate Bonds	0.365	0.00	0.365	0.0000	-19.90%	-
Cushon Sustainable UK Corporate Bonds	0.375	0.00	0.375	0.0000	-19.91%	-
Cushon Sustainable UK Corporate Bonds	0.395	0.00	0.395	0.0000	-19.94%	-
Cushon Sustainable UK Corporate Bonds	0.415	0.00	0.415	0.0000	-19.97%	-
Cushon Sustainable UK Corporate Bonds	0.425	0.00	0.425	0.0000	-19.99%	-
Cushon Sustainable UK Corporate Bonds	0.435	0.00	0.435	0.0000	-20.00%	-
Cushon Sustainable UK Corporate Bonds	0.445	0.00	0.445	0.0000	-20.02%	-
Cushon Sustainable UK Corporate Bonds	0.465	0.00	0.465	0.0000	-20.05%	-
Cushon Sustainable UK Corporate Bonds	0.475	0.00	0.475	0.0000	-20.06%	-
Cushon Sustainable UK Corporate Bonds	0.485	0.00	0.485	0.0000	-20.08%	-
Cushon Sustainable UK Corporate Bonds	0.495	0.00	0.495	0.0000	-20.09%	-
Cushon Sustainable UK Corporate Bonds	0.525	0.00	0.525	0.0000	-20.14%	-
Cushon Sustainable UK Corporate Bonds	0.575	0.00	0.575	0.0000	-20.21%	-
Cushon Sustainable UK Corporate Bonds	0.625	0.00	0.625	0.0000	-20.29%	-
Cushon Sustainable UK Corporate Bonds	0.665	0.00	0.665	0.0000	-20.35%	-
Cushon Sustainable UK Corporate Bonds	0.695	0.00	0.695	0.0000	-20.40%	-
Cushon Sustainable UK Corporate Bonds	0.725	0.00	0.725	0.0000	-20.44%	-
Cushon Sustainable UK Corporate Bonds	0.975	0.00	0.975	0.0000	-20.82%	-

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	Net performance since inception to 31 December 2022	12-month net return to 31 December 2022
Cushon Sustainable UK Equity	0.144	0.00	0.144	0.0478	1.69%	-2.77%
Cushon Sustainable UK Equity	0.194	0.00	0.194	0.0478	1.61%	-2.85%
Cushon Sustainable UK Equity	0.234	0.00	0.234	0.0478	1.55%	-2.91%
Cushon Sustainable UK Equity	0.244	0.00	0.244	0.0478	1.54%	-2.93%
Cushon Sustainable UK Equity	0.254	0.00	0.254	0.0478	1.52%	-2.94%
Cushon Sustainable UK Equity	0.264	0.00	0.264	0.0478	1.51%	-2.96%
Cushon Sustainable UK Equity	0.284	0.00	0.284	0.0478	1.48%	-2.99%
Cushon Sustainable UK Equity	0.314	0.00	0.314	0.0478	1.43%	-3.03%
Cushon Sustainable UK Equity	0.324	0.00	0.324	0.0478	1.42%	-3.05%
Cushon Sustainable UK Equity	0.334	0.00	0.334	0.0478	1.40%	-3.06%
Cushon Sustainable UK Equity	0.344	0.00	0.344	0.0478	1.39%	-3.08%
Cushon Sustainable UK Equity	0.364	0.00	0.364	0.0478	1.35%	-3.11%
Cushon Sustainable UK Equity	0.384	0.00	0.384	0.0478	1.32%	-3.14%
Cushon Sustainable UK Equity	0.394	0.00	0.394	0.0478	1.31%	-3.15%
Cushon Sustainable UK Equity	0.404	0.00	0.404	0.0478	1.29%	-3.17%
Cushon Sustainable UK Equity	0.414	0.00	0.414	0.0478	1.28%	-3.18%
Cushon Sustainable UK Equity	0.434	0.00	0.434	0.0478	1.25%	-3.21%
Cushon Sustainable UK Equity	0.444	0.00	0.444	0.0478	1.23%	-3.23%
Cushon Sustainable UK Equity	0.454	0.00	0.454	0.0478	1.22%	-3.25%
Cushon Sustainable UK Equity	0.464	0.00	0.464	0.0478	1.20%	-3.26%
Cushon Sustainable UK Equity	0.494	0.00	0.494	0.0478	1.16%	-3.31%
Cushon Sustainable UK Equity	0.544	0.00	0.544	0.0478	1.08%	-3.38%
Cushon Sustainable UK Equity	0.594	0.00	0.594	0.0478	1.01%	-3.46%
Cushon Sustainable UK Equity	0.634	0.00	0.634	0.0478	0.94%	-3.52%
Cushon Sustainable UK Equity	0.664	0.00	0.664	0.0478	0.90%	-3.56%
Cushon Sustainable UK Equity	0.694	0.00	0.694	0.0478	0.85%	-3.61%
Cushon Sustainable UK Equity	0.944	0.00	0.944	0.0478	0.47%	-3.99%

APPENDIX 4 – Retirement Bridge charges & net investment returns

Fund Name	A – Annual Management Charge (AMC) (% per annum)	B – Additional Expenses (% per annum)	C – Expense Ratio (% per annum)	Transaction Costs	12-month net return to 31 December 2022
AB Retirement Bridge 1948 Drawdown Strategy	0.8290	0.0210	0.8500	0.0017	-23.7%
AB Retirement Bridge 1950 Drawdown Strategy	0.8280	0.0220	0.8500	0.0014	-24.1%
AB Retirement Bridge 1951 Drawdown Strategy	0.8280	0.0220	0.8500	0.0013	-23.9%
AB Retirement Bridge 1953 Drawdown Strategy	0.8270	0.0230	0.8500	0.0012	-23.6%
AB Retirement Bridge 1954 Drawdown Strategy	0.8260	0.0240	0.8500	0.0012	-23.5%
AB Retirement Bridge 1956 Drawdown Strategy	0.8250	0.0250	0.8500	0.0011	-23.2%
AB Retirement Bridge 1958 Drawdown Strategy	0.8240	0.0260	0.8500	0.0010	-22.9%
AB Retirement Bridge 1960 Drawdown Strategy	0.8240	0.0260	0.8500	0.0010	-22.8%
AB Retirement Bridge 1961 Drawdown Strategy	0.8240	0.0260	0.8500	0.0010	-22.7%
AB Retirement Bridge 1964 Drawdown Strategy	0.8240	0.0260	0.8500	0.0010	-22.5%
AB Retirement Bridge 1966 Drawdown Strategy	0.8240	0.0260	0.8500	0.0010	-22.4%
AB Retirement Bridge 1967 Drawdown Strategy	0.8240	0.0260	0.8500	0.0000	N/A
AB Retirement Strategies Fund 2026-2028	0.7790	0.0150	0.7940	0.0010	-13.7%
AB Retirement Strategies Fund 2032-2034	0.7780	0.0250	0.8030	0.0005	-16.0%
AB Retirement Strategies Fund 2035-2037	0.7780	0.0290	0.8060	0.0003	-15.5%
AB Retirement Strategies Fund 2038-2040	0.7770	0.0290	0.8070	0.0004	-13.7%
AB Retirement Strategies Fund 2041-2043	0.7770	0.0270	0.8040	0.0005	-12.3%

APPENDIX 5 - Salvus Cautious and Balanced Lifestyle charges & net investment returns

Historically the two main default investment strategies were the Cautious Lifestyle and the Balanced Lifestyle. Following the completed investment strategy review, these default investment strategies are no longer in use, however, as they were operational during the Scheme year, detail on how these strategies operated, the charges applying and performance information follows for noting.

The objective of all the default investment strategies is to balance investment risk with the opportunity for providing long-term investment growth. To accomplish this, the Cautious and Balanced Lifestyle funds had three distinct phases: Growth, Consolidation and Pre-Retirement.

During the Growth Stage, members were invested in mostly shares with the aim of generating long-term growth.

In the Cautious Lifestyle default investment strategy, 15 years before members' target retirement age (assumed to be age 65) members moved into the Consolidation Stage and their funds were invested in more UK bonds and gilts to protect any gains that had been made. Finally, when members were 4 years before their target retirement age, they move into the Pre-Retirement Stage where they were invested in more cash with the aim of protecting against any sudden downturn in the share market. A breakdown is detailed in table 1 below:

Salvus Cautious Lifestyle

	Cautious Lifestyle Stage		
Fund Name	Growth	Consolidation	Pre-Retirement
Aegon BlackRock UK Equity Tracker	35%	30%	-
Aegon BlackRock World (Ex-UK) Equity Tracker	45%	-	-
Aegon BlackRock UK Index-Linked Gilt Index	4%	-	-
UK Gilts All Stocks Tracker	12%	30%	-
Aegon BlackRock Corporate Bond Tracker	4%	40%	-
Aegon Cash	-	-	100%

In the Balanced Lifestyle the objective was to balance the investment risk with the opportunity for providing long-term investment growth in three distinct phases: Growth, Consolidation and Pre-Retirement.

In the Balanced Lifestyle default investment strategy, 10 years before members' target retirement age (assumed to be age 65) members moved into the Consolidation Stage and their funds were invested in more UK bonds and gilts to protect any gains that had been made. Finally, when members were 3 years before their target retirement age, they moved into the Pre-Retirement Stage where they were invested in more cash with the aim of protecting against any sudden downturn in the share market. A breakdown is detailed in the table overleaf.

Salvus Balanced Lifestyle

Fund Name	Balanced Lifestyle Stage		
	Growth	Consolidation	Pre-Retirement
Aegon BlackRock UK Equity Tracker	20%	50%	-
Aegon BlackRock World (Ex-UK) Equity Tracker	70%	20%	-
Aegon BlackRock UK Index-Linked Gilt Index	-	-	-
UK Gilts All Stocks Tracker	5%	10%	-
Aegon BlackRock Corporate Bond Tracker	5%	20%	-
Aegon Cash	-	-	100%

The level of charges applied to the Cautious and Balanced Lifestyle funds are set out below.

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	12 month net return to 31 December 2022 **
Cautious Lifestyle – Growth phase	0.29	0.01	0.30	0.0004	-10.4%
Cautious Lifestyle – Consolidation phase	0.29	0.01	0.30	0.0006	-15.5%
Cautious Lifestyle – Pre-retirement phase	0.29	0.00	0.29	0.0000	0.6%
Cautious Lifestyle – Growth phase	0.34	0.01	0.35	0.0004	-10.5%
Cautious Lifestyle – Consolidation phase	0.34	0.01	0.35	0.0006	-15.5%
Cautious Lifestyle – Pre-retirement phase	0.34	0.00	0.34	0.0000	0.5%
Cautious Lifestyle – Growth phase	0.44	0.01	0.45	0.0004	-10.6%
Cautious Lifestyle – Consolidation phase	0.44	0.01	0.45	0.0006	-15.6%
Cautious Lifestyle – Pre-retirement phase	0.44	0.00	0.44	0.0000	0.4%
Cautious Lifestyle – Growth phase	0.49	0.01	0.50	0.0004	-10.6%
Cautious Lifestyle – Consolidation phase	0.49	0.01	0.50	0.0006	-15.7%
Cautious Lifestyle – Pre-retirement phase	0.49	0.00	0.49	0.0000	0.4%

Fund Name	A -Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs	12 month net return to 31 December 2022 **
Cautious Lifestyle – Growth phase	0.50	0.01	0.51	0.0004	-10.6%
Cautious Lifestyle – Consolidation phase	0.50	0.01	0.51	0.0006	-15.7%
Cautious Lifestyle – Pre-retirement phase	0.50	0.00	0.50	0.0000	0.4%
Cautious Lifestyle – Growth phase	0.60	0.01	0.61	0.0004	-10.7%
Cautious Lifestyle – Consolidation phase	0.60	0.01	0.61	0.0006	-15.8%
Cautious Lifestyle – Pre-retirement phase	0.60	0.00	0.60	0.0000	0.3%
Cautious Lifestyle – Growth phase	0.65	0.01	0.66	0.0004	-10.8%
Cautious Lifestyle – Consolidation phase	0.65	0.01	0.66	0.0006	-15.8%
Cautious Lifestyle – Pre-retirement phase	0.65	0.00	0.65	0.0000	0.2%
Cautious Lifestyle – Growth phase	0.75	0.01	0.76	0.0004	-10.9%
Cautious Lifestyle – Consolidation phase	0.75	0.01	0.76	0.0006	-15.9%
Cautious Lifestyle – Pre-retirement phase	0.75	0.00	0.75	0.0000	0.1%
Cautious Lifestyle – Growth phase	0.29	0.01	0.3	0.0002	-9.5%
Cautious Lifestyle – Consolidation phase	0.29	0.01	0.3	0.0005	-8.8%
Cautious Lifestyle – Pre-retirement phase	0.29	0.00	0.29	0.0000	0.6%
Balanced Lifestyle – Growth phase	0.34	0.01	0.35	0.0002	-9.5%
Balanced Lifestyle – Consolidation phase	0.34	0.01	0.35	0.0005	-8.8%
Balanced Lifestyle – Pre-retirement phase	0.34	0.00	0.34	0.0000	0.5%
Balanced Lifestyle – Growth phase	0.50	0.01	0.51	0.0002	-9.7%
Balanced Lifestyle – Consolidation phase	0.50	0.01	0.51	0.0005	-9.0%
Balanced Lifestyle – Pre-retirement phase	0.50	0.00	0.5	0.0000	0.4%
Balanced Lifestyle – Growth phase	0.75	0.01	0.76	0.0002	-10.0%
Balanced Lifestyle – Consolidation phase	0.75	0.01	0.76	0.0005	-9.2%
Balanced Lifestyle – Pre-retirement phase	0.75	0.00	0.75	0.0000	0.1%

** The net returns to 31 December 2022 of the Cautious and Balanced Lifestyle – Growth phase is the age related returns for the lifestyle funds (split by fee class) for a 25 year old and 45 year old. The net returns to 31 December 2022 of the Cautious and Balanced Lifestyle – Consolidation phase is the age related returns for the lifestyle funds (split by fee class) for a 55 year old.

APPENDIX 6 - Ascot Lloyd Pension Trust charges & net investment returns

This default investment strategy is no longer in use, however, as they were operational during the Scheme year, detail on how these strategies operated, the charges applying and performance information follows for noting.

The active Ascot Lloyd Pension Trust transferred to the Cushon Master Trust on 1 October 2020, with the transfer of the deferred scheme assets taking place on 29 January 2021. For these members, the default investment strategy was determined by the transferring trustees (the trustees of the Ascot Lloyd Pension Trust). Contributions were invested in line with their existing investment strategy, whereby members are provided with a default investment strategy from a range of Retirement Age Funds (RAFs). The relevant RAF is based on the member's assumed normal retirement age (Age 65).

The level of charges for the Ascot Lloyd Pension Trust default funds, together with the net investment returns are set out below.

Fund Name	A - Annual Management Charge (AMC) (% per annum)	B - Additional Expenses (% per annum)	C - Total Expense Ratio (% per annum)	Transaction Costs (% per annum)	12-month net return to 30 September 2022 %
2020 Retirement Age Fund	0.500	0.006	0.506	0.04	-13.0%
2025 Retirement Age Fund	0.500	0.007	0.507	0.04	-14.3%
2030 Retirement Age Fund	0.500	0.009	0.509	0.04	-15.1%
2035 Retirement Age Fund	0.500	0.010	0.510	0.04	-13.6%
2040 Retirement Age Fund	0.500	0.011	0.511	0.04	-11.6%
2045 Retirement Age Fund	0.500	0.012	0.512	0.03	-10.2%
2050 Retirement Age Fund	0.500	0.013	0.513	0.03	-8.9%
2055 Retirement Age Fund	0.500	0.015	0.515	0.02	-7.7%
2060 Retirement Age Fund	0.500	0.015	0.515	0.02	-7.4%
2020 Retirement Age Fund	0.200	0.006	0.206	0.04	-13.0%
2025 Retirement Age Fund	0.200	0.007	0.207	0.04	-14.3%
2030 Retirement Age Fund	0.200	0.009	0.209	0.04	-15.1%
2035 Retirement Age Fund	0.200	0.010	0.210	0.04	-13.6%
2040 Retirement Age Fund	0.200	0.011	0.211	0.04	-11.6%
2045 Retirement Age Fund	0.200	0.012	0.212	0.03	-10.2%
2050 Retirement Age Fund	0.200	0.013	0.213	0.03	-8.9%
2055 Retirement Age Fund	0.200	0.015	0.215	0.02	-7.7%
2060 Retirement Age Fund	0.200	0.015	0.215	0.02	-7.4%
Equity Accumulation	0.500	0.015	0.515	0.02	-7.4%
Equity Accumulation	0.200	0.015	0.215	0.02	-7.4%
Retirement Ready	0.500	0.006	0.506	0.04	-12.9%
Retirement Ready	0.200	0.006	0.206	0.04	-12.9%

APPENDIX 7 - Spinnaker Master Trust charges & net investment returns

This default investment strategy is no longer in use, however, as it was operational during the Scheme year, detail on how this strategy operated, the charges applying and performance information follows for noting.

Spinnaker was set up to accept the defined contribution funds from pension schemes entering the Pension Protection Fund (PPF). Occupational pension schemes which are mostly defined benefit in structure may be eligible for the PPF if the employer sponsor of the scheme fails for whatever reason. At that time there may also be Defined Contribution (DC) elements which the PPF cannot directly receive and manage, and some of these DC pensions have therefore been transferred to the Spinnaker section.

This section has its own default investment strategy which uses the Aegon BlackRock 50/50 Equity & Bond Tracker fund or the Aegon Cash fund. This is different from the main section in view of the larger pension pot sizes that were transferred by the PPF.

The Trustees reviewed the structure and performance of the default investment strategy as part of the overall Scheme investment strategy review. The Cash Fund assets were moved to the Mobius Life investment platform during the year, at which point the Trustees asked the Scheme Sponsor if they would be prepared to reduce the charges for the Spinnaker members whose Cash Fund holdings had an Annual Management Charge (AMC) greater than 0.5%. Cushon agreed to this request and the affected members were contacted to notify them of this reduction in AMC.

The Aegon BlackRock 50/50 Equity & Bond Tracker funds will remain on the Aegon platform until the new Cushon default investment strategy is launched.

As detailed above, in addition to the Qualifying section for auto-enrolment purposes, there is a Non-Contributory and a Spinnaker Master Trust section which do not have to comply with the charge cap because they are not used for automatic enrolment. These sections are used by schemes looking to wind-up or who are entering the Pension Protection Fund (PPF) and are looking for an appropriate pension vehicle to accept, manage and govern their members' DC entitlements. This includes the merger of the Spinnaker Master Trust where members are predominantly invested in the Aegon BlackRock Aquila 50/50 Equity and Bond Tracker Fund or the Aegon Cash Fund.

The level of charges that apply to the Spinnaker Master Trust funds together with the net investment returns are set out below.

Fund Name	A – Annual Management Charge (AMC) (% per annum)	B – Additional Expenses (% per annum)	C – Expense Ratio (% per annum)	Transaction Costs (% per annum)	12-month net return to 31 December 2022 %	3 year net return to 31 December 2022 (per annum) %
Aegon BlackRock 50/50 Equity and Bond Tracker	0.400	0.010	0.410	0.030	-20.9%	-3.9%
Aegon BlackRock 50/50 Equity and Bond Tracker	0.500	0.010	0.510	0.030	-21.0%	-4.0%
Aegon BlackRock 50/50 Equity and Bond Tracker	0.750	0.010	0.760	0.030	-21.2%	-4.2%
Aegon BlackRock 50/50 Equity and Bond Tracker	1.000	0.010	1.010	0.030	-21.5%	-4.5%
Cash	0.500	0.010	0.510	0.030	1.1%	0.2%

APPENDIX 8 - Mapped Investment funds charges & net investment returns

This default investment strategy is no longer in use, however, as it was operational during the Scheme year, detail on how this strategy operated, the charges applying and performance information follows for noting.

These members transitioned from a previous occupational scheme on a mapped basis, to equivalent funds within the Cushon Scheme. As the funds were invested without consent, then the receiving self-select funds are classed as a default investment strategy for investment and reporting purposes and must be reviewed every three years.

Members are invested in the Aegon Balanced Passive Fund. Then, 5 years prior to their target retirement age (assumed to be age 65), investments are moved to a combination of the Aegon Blackrock Over 15-year Gilts Tracker Fund and the Aegon Cash Fund.

The level of charges that apply to the Mapped Investment funds together with the net investment returns are set out below.

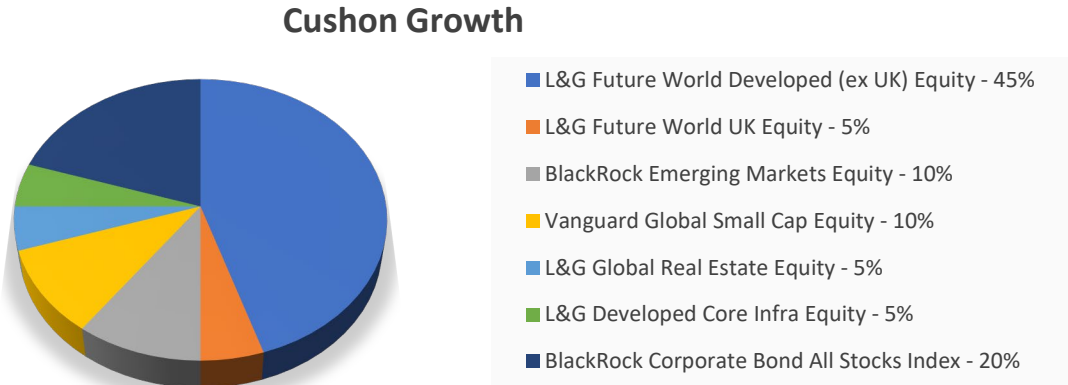
Fund Name	A – Annual Management Charge (AMC) (% per annum)	B – Additional Expenses (% per annum)	C – Expense Ratio (% per annum)	Transaction Costs	Net return from 31/12/2021 to date of disinvestment
Balanced Passive Fund	0.450	0.0001	0.4501	0.0007	-12.1%
Over 15-year Gilt Index	0.450	0.0001	0.4501	-0.0001	-45.0%
Cash	0.450	0.0000	0.4500	0.0000	0.5%

APPENDIX 9 – Cushon Flexible Retirement charges & net investment returns

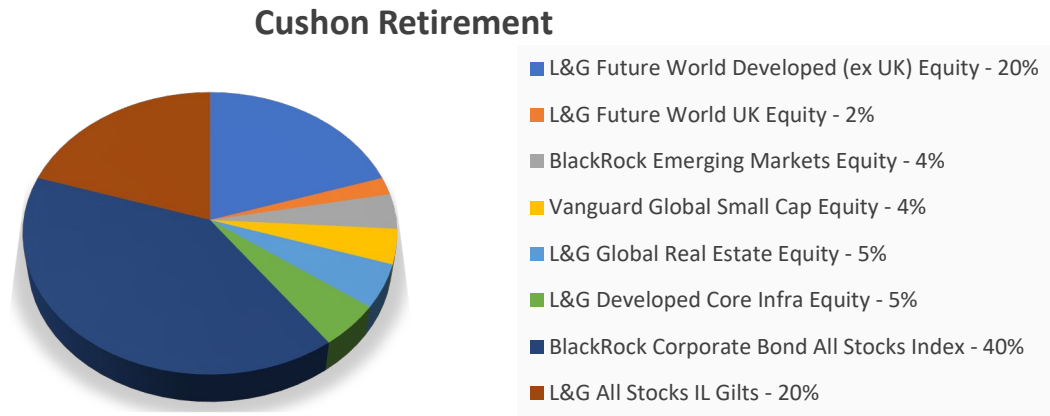
This default investment strategy is no longer in use, however, as it was operational during the Scheme year, detail on how this strategy operated, the charges applying and performance information follows for noting.

At the end of 2020 a further default investment strategy known as the Cushon Flexible Retirement Strategy was launched. The underlying investments that make up this strategy are the Cushon Growth and Cushon Retirement funds, with the lifestyling element of the default beginning 10 years prior to members normal retirement age.

The funds for the growth phase are:-



The funds for the pre-retirement phase are:-



The level of charges that apply to the Cushon Flexible Retirement funds together with the net investment returns are set out below..

Fund Name	A – Annual Management Charge (AMC) (% per annum)	B – Additional Expenses (% per annum)	C – Expense Ratio (% per annum)	Transaction Costs	Net return since inception to 31 December 2022	12 month net return to 31 December 2022
Cushon Growth Fund	0.37 to 0.55	0.0239	0.3939 to 0.5739	0.0015	-0.03%	-10.61%
Cushon Retirement Fund	0.37 to 0.55	0.0000	0.377 to 0.55	0.0013	-11.17%	-16.73%

APPENDIX 10 – Legacy self-select funds charges & net investment returns

These self-select funds are no longer in use, however, as they were operational during the Scheme year, detail on the charges together with the net investment returns are set out below.

Fund Name	A – Annual Management Charge (AMC) (% per annum)	B – Additional Expenses (% per annum)	C – Expense Ratio (% per annum)	Transaction Costs	Net return from 31/12/2021 to date of disinvestment
Aegon BlackRock 50/50 Global Equity Tracker	0.450	0.010	0.4510	0.0003	-20.9%
Balanced Passive (0.23%)	0.230	0.0001	0.2301	0.0007	-11.9%
Balanced Passive (0.45%)	0.450	0.0001	0.4501	0.0007	-12.1%
BlackRock Balanced Passive (0.75%)	0.750	0.0001	0.7501	0.0007	-12.7%
BlackRock Aquila Pacific Rim Equity (0.75%)	0.750	0.0001	0.7501	-0.0005	-6.0%
BlackRock Emerging Mkts Equity Tracker (0.75%)	0.750	0.0007	0.7507	0.0037	-10.9%
Cash (0.29%)	0.290	0.0000	0.2900	0.0000	1.0%
Cash (0.34%)	0.340	0.0000	0.3400	0.0000	0.6%
Cash (0.44%)	0.440	0.0000	0.4400	0.0000	0.3%
Cash (0.45%)	0.450	0.0000	0.4500	0.0000	0.5%
Cash (0.49%)	0.490	0.0000	0.4900	0.0000	-0.2%
Cash (0.50%)	0.500	0.0000	0.5000	0.0000	-4.1%
Cash (0.60%)	0.600	0.0000	0.6000	0.0000	-0.4%
Cash (0.65%)	0.650	0.0000	0.6500	0.0000	-0.1%
Cash (0.72%)	0.720	0.0000	0.7200	0.0000	0.8%
Cash Fund (0.50%)	0.500	0.0000	0.5000	0.0000	0.0%
Corporate Bond Index (0.29%)	0.290	0.0001	0.2901	0.0004	-14.3%
Corporate Bond Index (0.34%)	0.340	0.0001	0.3401	0.0004	-19.7%
Corporate Bond Index (0.44%)	0.440	0.0001	0.4401	0.0004	-14.0%
Corporate Bond Index (0.49%)	0.490	0.0001	0.4901	0.0004	-14.6%
Corporate Bond Index (0.50%)	0.500	0.0001	0.5001	0.0004	-14.5%
Corporate Bond Index (0.60%)	0.600	0.0001	0.6001	0.0004	-14.6%
Corporate Bond Index (0.65%)	0.650	0.0001	0.6501	0.0004	-14.0%

Fund Name	A – Annual Management Charge (AMC) (% per annum)	B – Additional Expenses (% per annum)	C – Expense Ratio (% per annum)	Transaction Costs	Net return from 31/12/2021 to date of disinvestment
Corporate Bond Index (0.72%)	0.720	0.0001	0.7201	0.0004	-14.3%
Distribution (0.75%)	0.750	0.0002	0.7502	0.0000	-17.4%
Ethical (1.05%)	1.050	0.0000	1.0500	-0.0001	-21.7%
HSBC Amanah Fund (1.05%)	1.050	0.0000	1.0500	0.0000	-12.5%
M&G Recovery (1.45%)	1.450	0.0012	1.4512	0.0001	-17.6%
M&G Recovery (1.25%)	1.250	0.0012	1.2512	0.0001	-18.0%
Over 15y Corporate Bond Index (0.29%)	0.290	0.0003	0.2903	0.0011	-43.1%
Over 15y Corporate Bond Index (0.34%)	0.340	0.0003	0.3403	0.0011	-42.7%
Over 15y Corporate Bond Index (0.44%)	0.440	0.0003	0.4403	0.0011	-42.3%
Over 15y Corporate Bond Index (0.49%)	0.490	0.0003	0.4903	0.0011	-42.3%
Over 15y Corporate Bond Index (0.50%)	0.500	0.0003	0.5003	0.0011	-43.4%
Over 15y Corporate Bond Index (0.60%)	0.600	0.0003	0.6003	0.0011	-43.5%
Over 15y Corporate Bond Index (0.65%)	0.650	0.0003	0.6503	0.0011	-44.6%
Over 15y Corporate Bond Index (0.75%)	0.750	0.0003	0.7503	0.0011	-42.8%
Over 15y UK Gilt Index (0.34%)	0.340	0.0001	0.3401	-0.0001	-45.3%
Over 15y UK Gilt Index (0.44%)	0.440	0.0001	0.4401	-0.0001	-45.4%
Over 15y UK Gilt Index (0.45%)	0.450	0.0001	0.4501	-0.0001	-45.0%
Over 15y UK Gilt Index (0.50%)	0.500	0.0001	0.5001	-0.0001	-44.8%
Over 15y UK Gilt Index (0.60%)	0.600	0.0001	0.6001	-0.0001	-46.1%
Over 15y UK Gilt Index (0.75%)	0.750	0.0001	0.7501	-0.0001	-45.5%
Over 5y UK Index-Linked Gilt (0.29%)	0.290	0.0001	0.2901	0.0003	-71.9%
Over 5y UK Index-Linked Gilt (0.34%)	0.340	0.0001	0.3401	0.0003	-75.0%
Over 5y UK Index-Linked Gilt (0.44%)	0.440	0.0001	0.4401	0.0003	-86.9%
Over 5y UK Index-Linked Gilt (0.49%)	0.490	0.0001	0.4901	0.0003	-71.5%
Over 5y UK Index-Linked Gilt (0.50%)	0.500	0.0001	0.5001	0.0003	-70.8%
Over 5y UK Index-Linked Gilt (0.60%)	0.600	0.0001	0.6001	0.0003	-71.1%
Over 5y UK Index-Linked Gilt (0.65%)	0.650	0.0001	0.6501	0.0003	-71.4%
Over 5y UK Index-Linked Gilt (0.72%)	0.720	0.0001	0.7201	0.0003	-71.3%

Fund Name	A – Annual Management Charge (AMC) (% per annum)	B – Additional Expenses (% per annum)	C – Expense Ratio (% per annum)	Transaction Costs	Net return from 31/12/2021 to date of disinvestment
UK Equity Index (0.29%)	0.290	0.0001	0.2901	0.0007	-9.1%
UK Equity Index (0.34%)	0.340	0.0001	0.3401	0.0007	-12.7%
UK Equity Index (0.44%)	0.440	0.0001	0.4401	0.0007	-6.6%
UK Equity Index (0.45%)	0.450	0.0001	0.4501	0.0007	-8.3%
UK Equity Index (0.49%)	0.490	0.0001	0.4901	0.0007	-14.5%
UK Equity Index (0.50%)	0.500	0.0001	0.5001	0.0007	-14.4%
UK Equity Index (0.60%)	0.600	0.0001	0.6001	0.0007	-8.5%
UK Equity Index (0.65%)	0.650	0.0001	0.6501	0.0007	-16.7%
UK Equity Index (0.72%)	0.720	0.0001	0.7201	0.0007	-16.7%
UK Gilts Allstocks Tracker (0.29%)	0.290	0.0001	0.2901	0.0008	-18.6%
UK Gilts Allstocks Tracker (0.34%)	0.340	0.0001	0.3401	0.0008	-19.7%
UK Gilts Allstocks Tracker (0.44%)	0.440	0.0001	0.4401	0.0008	-18.4%
UK Gilts Allstocks Tracker (0.49%)	0.490	0.0001	0.4901	0.0008	-18.9%
UK Gilts Allstocks Tracker (0.50%)	0.500	0.0001	0.5001	0.0008	-18.8%
UK Gilts Allstocks Tracker (0.60%)	0.600	0.0001	0.6001	0.0008	-18.9%
UK Gilts Allstocks Tracker (0.65%)	0.650	0.0001	0.6501	0.0008	-18.7%
UK Gilts Allstocks Tracker (0.72%)	0.720	0.0001	0.7201	0.0008	-18.7%
World (ex UK) Equity Index (0.29%)	0.290	0.0001	0.2901	0.0000	-10.8%
World (ex UK) Equity Index (0.34%)	0.340	0.0001	0.3401	0.0000	-11.8%
World (ex UK) Equity Index (0.44%)	0.440	0.0001	0.4401	0.0000	2.0%
World (ex UK) Equity Index (0.45%)	0.450	0.0001	0.4501	0.0000	-12.0%
World (ex UK) Equity Index (0.49%)	0.490	0.0001	0.4901	0.0000	-10.8%
World (ex UK) Equity Index (0.50%)	0.500	0.0001	0.5001	0.0000	-11.9%
World (ex UK) Equity Index (0.60%)	0.600	0.0001	0.6001	0.0000	-11.9%
World (ex UK) Equity Index (0.65%)	0.650	0.0001	0.6501	0.0000	-11.0%
World (ex UK) Equity Index (0.72%)	0.720	0.0001	0.7201	0.0000	2.0%
LGIM Pre-Retirement Fund (0.80%)	0.800	0.0000	0.8000	-0.0016	-35.2%
Ascot Lloyd Diversified Beta Fund	0.500	0.011	0.511	0.03	-11.2%

Fund Name	A – Annual Management Charge (AMC) (% per annum)	B – Additional Expenses (% per annum)	C – Expense Ratio (% per annum)	Transaction Costs	12 month net return to 30 September 2022
Ascot Lloyd Managed Fund	0.750	0.200	0.770	0.13	-27.9%
Ascot Lloyd Passive All Stock Fixed Interest Gilt Fund	0.400	0.000	0.400	0.01	-23.3%
Ascot Lloyd Sterling Liquidity Fund	0.400	0.000	0.400	0.03	0.7%

APPENDIX 11 – Notes to net investment returns

- Performance is shown net of fees since (including transaction costs) are shown net of fees, since inception on Mobius Life platform. Longer term performance is unavailable due to the inception date of the fund's launch on the Mobius Life platform.
- Performance of the funds that were disinvested during the year are shown to either 31 December 2022 or the date of disinvestment. This is reflected in the column headings.
- Longer term performance is not available on the newly launched default investment strategy and other funds that were launched during the year.
- We have provided all investment return information that has been available.
- Member specific investment return information, based on their charges, is detailed within the Cushon App, for those members who have access.
- Due to the platform move and the investment strategy move, the net performance since inception to 31 December 2022 for the lifestyle funds (split by fee class) for a 25 year old, 45 year old and 55 year old are the same as the returns shown from inception/12 months.
- Some of the funds are the same but with a different Annual Management Charge (AMC). This reflects the commercial requirement to cover costs but still allow the Scheme to remain open to the very smallest employers and deliver the same features and Scheme benefits.
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APPENDIX 12 – LEGACY DEFAULT STRATEGIES: ILLUSTRATION OF CHARGES & DISCLOSURE COSTS

Projected Pension Pot in today's money

Years from now	Cautious Lifestyle		Balanced Lifestyle		Ascot Lloyd Pension Trust	
	Before charges	After charges	Before charges	After charges	Before charges	After charges
0	£6,500	£6,500	£6,500	£6,500	£6,500	£6,500
1	£8,645	£8,598	£8,671	£8,623	£8,650	£8,607
2	£10,825	£10,718	£10,886	£10,778	£10,836	£10,738
3	£13,040	£12,860	£13,145	£12,963	£13,058	£12,894
4	£15,291	£15,024	£15,449	£15,180	£15,318	£15,075
5	£17,577	£17,211	£17,800	£17,428	£17,616	£17,282
10	£29,576	£28,497	£30,281	£29,170	£29,696	£28,708
15	£42,573	£40,388	£44,069	£41,786	£42,827	£40,820
20	£56,655	£52,919	£59,302	£55,344	£57,102	£53,659
25	£71,914	£66,125	£76,135	£69,915	£72,622	£67,270
30	£88,449	£80,043	£94,737	£85,578	£89,498	£81,701
35	£106,369	£94,715	£115,298	£102,414	£107,850	£97,003
40	£123,682	£108,341	£138,025	£120,515	£127,809	£113,229
45	£138,175	£119,076	£161,501	£138,569	£149,517	£130,437
50	£143,018	£121,319	£171,737	£144,813	£173,131	£148,687

Years from now	Spinnaker 50/50 Equity & Bond Tracker		Spinnaker Cash Fund (lowest return)		Mapped Investment funds	
	Before charges	After charges	Before charges	After charges	Before charges	After charges
0	£6,500.00	£6,500.00	£6,500.00	£6,500.00	£6,500.00	£6,500.00
1	£6,529.25	£6,466.57	£6,401.85	£6,369.84	£6,624.80	£6,591.68
2	£6,558.63	£6,433.31	£6,305.18	£6,242.29	£6,752.00	£6,684.64
3	£6,588.15	£6,400.22	£6,209.97	£6,117.29	£6,881.63	£6,778.93
4	£6,617.79	£6,367.30	£6,116.20	£5,994.79	£7,013.76	£6,874.54
5	£6,647.57	£6,334.56	£6,023.85	£5,874.75	£7,148.43	£6,971.49
10	£6,798.49	£6,173.32	£5,582.58	£5,309.65	£7,861.54	£7,477.19
15	£6,952.84	£6,016.20	£5,173.63	£4,798.90	£8,645.79	£8,019.56
20	£7,110.70	£5,863.07	£4,794.64	£4,337.28	£9,508.27	£8,601.28
25	£7,272.13	£5,713.83	£4,443.41	£3,920.07	£10,456.80	£9,225.20
30	£7,437.24	£5,568.40	£4,117.92	£3,542.99	£11,499.95	£9,894.37
35	£7,606.09	£5,426.67	£3,816.26	£3,202.18	£12,647.16	£10,612.08
40	£7,778.77	£5,288.55	£3,536.71	£2,894.16	£13,908.81	£11,381.86
45	£7,955.38	£5,153.94	£3,277.63	£2,615.76	£15,296.32	£12,207.47
50	£8,135.99	£5,022.76	£3,037.53	£2,364.15	£15,187.48	£11,820.61

Years from now	Cushon Flexible Retirement	
	Before charges	After charges
0	£6,500.00	£6,500.00
1	£8,663.20	£8,615.55
2	£10,867.12	£10,759.05
3	£13,112.54	£12,930.88
4	£15,400.25	£15,131.43
5	£17,731.08	£17,361.08
10	£30,061.39	£28,959.96
15	£43,600.65	£41,348.20
20	£58,469.49	£54,581.00
25	£74,800.59	£68,717.37
30	£92,739.87	£83,820.48
35	£112,447.80	£99,957.87
40	£134,100.85	£117,201.83
45	£153,165.16	£131,584.69
50	£162,547.33	£137,319.65

Notes to the legacy Default Strategies: Illustration of Charges & Disclosure costs as detailed on the previous page are:

- Values shown are estimates and are not guaranteed.
- Projected pension pot values are shown in today's terms.
- Costs and charges applied to the pension pot are assumed to remain at the same level throughout the term of the pension as those that applied during 2022.
- Future investment growth is determined by the investment fund selected and are in line with the method and assumptions governing Statutory Money Purchase Illustrations (SMPI) as detailed by the Faculty and Institute of Actuaries in Technical Memorandum 1 (TM1). The assumed growth rate for the Cautious Lifestyle is 3.7% per annum; for the Balanced Lifestyle is 4.1% per annum; for the Ascot Lloyd Pension Trust is 3.8% per annum; for the Spinnaker 50/50 Equity & Bond tracker fund is 2.50%; for the Spinnaker Cash fund is 0.50%; for the Mapped Investment funds is 4.00%; and for the Cushon Flexible Retirement is 4.00%.
- Future changes in investments as a result of lifestyling have been factored into the calculations, where applicable.
- The total costs and charges are assumed to be at a rate of 0.50% per annum for the Ascot Lloyd Pension Trust, Spinnaker Cash and Mapped Investment funds; 0.55% per annum for the Cautious Lifestyle, Balanced Lifestyle and Cushon Flexible Retirement; and 0.96% per annum for the Spinnaker 50/50 Equity & Bond tracker. These charges are in line with the average Total Expense Ratio detailed within this Chair's Statement.
- Inflation is assumed to be 2.0% each year.
- The starting pot size is £6,500.
- The starting salary is assumed to be £26,000.
- The projections assume that salaries increase in line with inflation, which is assumed to be 2.0% per annum, to allow for prudence in the projected values.
- Contributions are assumed to be 8.0% per year (employee plus employer contribution) for the Cautious Lifestyle, Balanced Lifestyle, Ascot Lloyd Pension Trust and Cushon Flexible Retirement strategies. 8.0% is the average contribution received for the contributory sections of the Scheme. It is assumed that no further contributions are received for the Spinnaker Master Trust and Mapped Investment fund sections.