Wednesbury Pension Scheme

Statement of Investment Principles

26 May 2023

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1 Introduction

This Statement sets out the principles governing decisions relating to the investment of the assets of the Wednesbury Pension Scheme (the Scheme).

The Scheme is a defined benefit arrangement set up under trust and registered with HM Revenue and Customs (HMRC). The Scheme is subject to the Statutory Funding Objective (SFO) introduced by the Pensions Act 2004, i.e., that it should have sufficient and appropriate assets to cover its Technical Provisions, as calculated in accordance with the Trustees' Statement of Funding Principles.

This Statement has been prepared in line with the following legislation and regulations:

- Section 35 of the Pensions Act 1995
- Section 244 of the Pensions Act 2004 and the Occupational Pension Scheme (Investment) Regulations 2005
- The Pension Protection Fund (Pensionable Service) and Occupational Pension Scheme (Investment and Disclosure) (Amendment and Modification) Regulations 2018
- The Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019

A copy of this Statement will be made available to Scheme members on request to the Trustees or online.

2 Investment Decision Making

The investment of the Scheme's assets is the responsibility of the Trustees. The Trustees' investment powers are set out in Rule 34.3 of the Scheme's Definitive Deed, dated 27 October 1999, as amended. The powers granted to the Trustees under this Clause are wide and this Statement is consistent with those powers.

The Trustees have obtained and considered professional advice on the content of this Statement from Broadstone Pensions Limited (Broadstone), its appointed investment adviser. Broadstone is authorised and regulated in the UK by the FCA. Broadstone has confirmed to the Trustees that it has the appropriate knowledge and experience to give the advice required under legislation. Broadstone is remunerated a fee for its advice and its appointment is reviewed from time to time by the Trustees.

The Trustees have also consulted the Principal Employer, Mueller Europe Limited, when setting its investment objectives and strategy, and in the preparation of this Statement.

Responsibility for maintaining the Statement and determining the Scheme's investment strategy rests solely with the Trustees. The Trustees will obtain such advice as they consider appropriate and necessary whenever they intend to review or revise this Statement.

3 Investment Objectives

In determining their investment objectives and strategy, the Trustees have considered the strength of the Principal Employer's willingness and ability to support the Scheme. They have determined that it is reasonable to take a long-term view in determining their investment objectives and strategy.

The Trustees have also agreed that the funding position, measured on a solvency basis is the assessment of scheme funding that is of most importance to the Trustees, the Principal Employer, and members, as it determines the Scheme's funding requirements and members' long-term benefit security.

The Trustees' investment objectives are as follows:

- To ensure that the assets are of a nature to enable the Trustees to meet the Scheme's benefits as they fall due.
- To invest the Scheme's assets in an appropriately diverse and liquid range of investments.
- To invest in a way that is consistent with the Scheme's funding objectives, i.e., to invest so that the investment return assumptions used to determine the Trustees' funding plan have a reasonable chance of being achieved in practice.
- To target a level of hedging of 100% against the interest rate risk and inflation risk associated with the Scheme's funded liabilities on a solvency basis (or asset value where the Scheme is in surplus).

Where future opportunities arise, the Trustees will consider steps to further reduce the volatility of the Scheme's funding position relative to its liabilities calculated under the solvency basis.

The Trustees will also have regard to the Principal Employer's views on the potential costs and risks associated with the investment objectives set and their implementation through the practical strategy.

4 Setting the Investment Strategy

Details of the investment strategy are set out in the Appendix to this Statement.

The Trustees' policies in setting the investment strategy are set out below:

Policy	
Selection of Investments	The Trustees may select investments from a wide range of asset classes from time to time, including, but not restricted to, UK equities, overseas equities, government bonds, corporate bonds, commercial property, and alternative asset classes, such as hedge funds, private equity, and infrastructure. The investments selected will be traded on regulated markets and, where this is not the case, any such investments will be kept to a prudent level. The Trustees may also: • Invest in products that use derivatives where this is for the purpose of risk management or to improve the efficiency of the management of the Scheme's investments. • Hold insurance policies such as deferred or immediate annuities which provide income to the Scheme, matching part, or all of the future liabilities due from it. • Hold a working cash balance for the purpose of meeting benefit payments due to members and the expenses of running the Scheme.
Target Asset Allocation	The Trustees will set a Target Asset Allocation from time to time, determined with the intention of meeting its investment objectives. The Target Asset Allocation will be set taking account of the characteristics of different asset classes available and will be reviewed considering any changes to the Trustees' view of the Principal Employer's covenant, the nature of the Scheme's liabilities or relevant regulations governing pension scheme investment. The Trustees have agreed the range of funds to be used in the investment strategy, considering the maturity of the Scheme's liabilities, and to ensure the range is sufficiently robust to allow easy adjustment between the funds as the Trustees' risk appetite changes and the Scheme matures
Delegation to Investment Managers	The Trustees will delegate the day-to-day management of the Scheme's assets to professional investment managers and will not be involved in the buying or selling of investments.
Maintaining the Target Asset Allocation and Target Hedging Ratios	The Trustees have responsibility for maintaining the overall balance of the asset allocation relative to the Target Asset Allocation and Target Hedging Ratios. The Trustees monitor the asset allocation with the assistance of their adviser, Broadstone, and will consider switching assets between funds should the allocation move significantly away from the Target Asset Allocation or Target Hedging Ratios. Maintaining the Target Hedge Ratios will take precedence over maintaining the Target Asset Allocation.

Policy	
Employer Related Investments	The Trustees' policy is not to hold any employer related investments as defined in the Pensions Act 1995, the Pensions Act 2004, and the Occupational Pension Scheme (Investment) Regulations 2005.

The Trustees have decided to invest in pooled funds because:

- the Scheme is not large enough to justify direct investment in equities or bonds on a cost-effective basis;
- pooled funds allow the Scheme to invest in a wider range of assets which serves to reduce risk; and
- pooled funds provide a more liquid form of investment than certain types of direct investment.

5 Realisation and Rebalancing of Assets

The assets are held in a combination of pooled funds and are fully and readily realisable.

The Trustees make disinvestments from the Investment Manager with the assistance of its administrators, as necessary, to meet the Scheme's cashflow requirements.

The strategy allows for cash to be realised without ad hoc investments being made, however, should additional cash be required to fund unexpected outgo, advice will be sought from Broadstone to confirm which pooled fund should be used for the disinvestment.

6 Expected Returns

The Trustees' objective is for the Scheme's assets to produce a return in excess of the growth in the value of its solvency liabilities. The Trustees expect the assets to produce a return in excess of the long-term growth in the value of the solvency liabilities.

Over the long-term, the Trustees' expectations are to achieve the following rates of return from the asset classes used within the range of Self Sufficiency Funds used by the Scheme:

Asset Class	Expected Returns
Buy and maintain Credit	To achieve a long-term return in excess of the yield available on a comparable portfolio of UK gilts to compensate for the additional risk associated with investing in a diversified portfolio of corporate bonds.
Government bonds	To achieve a long-term return in line with the yield available on a comparable portfolio of UK gilts or index-linked gilts.
LDI funds	In line with the sensitivity of the self-sufficiency liabilities to changes in interest rates and inflation expectations, allowing for the target level of hedging specified by the Trustees from time to time.

Asset Class	Expected Returns
Cash	To broadly match the return available in money markets.

The overall asset class strategy, comprised of a combination of LGIM Self Sufficiency funds, has an allocation of 55% to investment grade corporate bonds which are assumed to deliver a return in line with gilt yields plus 1.8% per annum. The ratio of the types of assets allocated in the current strategy would imply a best estimate expected return of approximately 1.0% per annum above the return on gilts. This best estimate expected return implies that the assets should grow quicker than the solvency liabilities over time.

7 Risks

The Trustees have considered various risks the Scheme faces, including market risk, interest rate risk, inflation risk, default risk, manager risk and currency risk, and consider that the Target Asset Allocation strikes a reasonable balance between risk mitigation and seeking an appropriate level of return, taking account of the strength of the Principal Employer's covenant.

The Target Asset Allocation has been determined with due regard to the characteristics of the Scheme's solvency liabilities.

The calculation of the Scheme's solvency liabilities uses assumptions for future investment returns and price inflation expectations that are based upon market values of financial securities such as fixed interest and index-linked government bonds. This means that the solvency liabilities are sensitive to changes in the price of these assets as market conditions vary and can have a volatile value.

The Trustees accept that their investment strategy may result in volatility in the Scheme's funding position. Furthermore, the Trustees also accept that there is a risk that the assets will not achieve the rates of investment return assumed in the calculation of the Scheme's solvency liabilities.

The Trustees invest in a wide range of corporate and government bond holdings as well as swaps through the pooled funds they use and consider the Scheme's strategy to be well diversified.

The Trustees will monitor the investment, covenant and funding risks faced by the Scheme with the assistance of their investment advisers and the Scheme Actuary at least every three years. The Trustees will consider the appropriateness of implementing additional risk mitigation strategies as part of such reviews.

In addition, the Trustees will review wider operational risks as part of maintaining their risk register.

8 Security of Assets

The day-to-day activities that the Investment Manager carries out for the Trustees are subject to regular internal reviews and external audits by independent auditors to ensure that operating procedures and risk controls remain appropriate.

Safe-keeping of the Scheme's assets held with the Investment Manager is performed by custodians appointed by them.

The Trustees have considered the security of the Scheme's holdings with the Investment Manager, allowing for its status as a reputable regulated firm, and consider the associated protection offered to be reasonable and appropriate.

9 Responsible Investment & Stewardship

The Trustees believe that in order to protect and enhance the value of the investments, during the period over which the benefits are paid, they must act as a responsible asset owner.

The Scheme is also comprised of a diverse membership, expected to hold a broad range of views on ethical, political, social, environmental, and quality of life issues. The Trustees therefore do not explicitly seek to reflect any specific views through the implementation of the investment strategy, both financial and non-financial.

The Trustees' policies in respect of responsible investment are set out below:

Policy	
Financially Material Considerations	The Trustees recognise that Environmental, Social and Governance (ESG) issues can and will have a material impact on the companies, governments and other organisations that issue or otherwise support the assets in which the Scheme invests. In turn, ESG issues can be expected to have a material financial impact on the returns provided by those assets. The Trustees delegate responsibility for day-to-day decisions on the selection of investments to the Investment Manager. The Trustees have an expectation that the Investment Manager will consider ESG issues in selecting investments or will otherwise engage with the issuers of the Scheme's underlying holdings on such matters in a way that is expected to improve the long-term return on the associated assets. With regard to the specific risk to the performance of the Scheme's investments associated with the impact of climate change, the Trustees take the view that this falls within their general approach to ESG issues. The Trustees regard the potential impact of climate change on the Scheme's assets as a longer-term risk and likely to be less material in the context of the short to medium term development of the Scheme's funding position than other risks. The Trustees will continue to monitor market developments in this area with their investment adviser.

Policy	
Non-Financially Material Considerations	Where ESG factors are non-financial (i.e., they do not pose a risk to the prospect of the financial success of the investment) the Trustees believe these should not drive investment decisions. The Trustees expect the Investment Manager, when exercising discretion in investment decision making, to consider non-financial factors only when all other financial factors have been considered and in such a circumstance the consideration of non-financial factors should not lead to a reduction in the efficiency of the investment.
Engagement and Voting Rights	The Trustees' voting and engagement policy is to use their investments to improve the Environmental, Social and Governance behaviors of the underlying investee companies. These ESG topics encompass a range of priorities, which may over time include climate change, biodiversity, the remuneration and composition of company boards, as well as poor working practices. The Trustees believe that having this policy, and aiming to improve how companies behave in the medium and long term, are in the members' best interests. The Trustees will aim to monitor the actions taken by the investment manager on its behalf and if there are significant differences from the policy detailed above, it will escalate any concerns which could lead to disinvesting their assets from the manager.
Capital Structure of Underlying Companies	Responsibility for monitoring the capital structure of investee companies is delegated to the Investment Manager. The Trustees expect the extent to which the Investment Manager monitors capital structure to be appropriate to the nature of the mandate.

The voting policies of LGIM, as the Investment Manager, can be found at the following website:

www.lgim.com/uk/en/capabilities/investment-stewardship

The Trustees' views on how ESG issues are taken account of in each asset class used within the pooled Self Sufficiency fund range is set out below:

Asset Class	Active/Passive Managed	ESG Views
Corporate Bonds	Active	The Trustees expect the investment manager to take financially material ESG factors into account, given the active management style of the funds.
Government Bonds	Active	The assets consist of government bond funds, with no underlying investee companies as such. Therefore, the Trustees believe there is less scope for the consideration of ESG issues to improve risk-adjusted returns in this asset class because of the nature of the securities.

LDI	Active	The underlying assets of the LDI solution consist of government bond funds and derivative contracts, with no underlying investee companies as such. Therefore, the Trustees believe there is less scope for the consideration of ESG issues to improve risk-adjusted returns in this asset class because of the nature of the securities.
Cash	Active	The underlying assets of the cash fund and cash holdings within the self-sufficiency fund range consist of money market and derivative investments with no underlying investee companies as such. Therefore, the Trustees believe there is less scope for the consideration of ESG issues to improve risk-adjusted returns in this asset class because of the nature of the securities.

The Trustees will review the stewardship policies/review whether their stewardship policies are aligned of any new investment managers appointed, as well as assessing the stewardship and engagement activity of the current Investment Manager on an ongoing basis.

10 Conflicts of Interest

The Trustees maintain a separate conflicts of interest policy and conflicts register.

Subject to reasonable levels of materiality, these documents record any actual or potential conflicts of interest in relation to investee companies or the Investment Manager, while also setting out a process for their management.

11 Duration of Investment Arrangements

The Trustees are long-term investors and have not set an explicit target to review the duration of its arrangements with the investment manager. However, the arrangements will be reviewed in conjunction with any review of the investment strategy.

12 Incentivisation of Investment Managers

The Investment Manager is primarily remunerated based on an agreed fixed annual percentage of the asset value for each underlying fund.

The Trustees do not directly incentivise the Investment Manager to align the approach they adopt for a particular fund with the Trustees' policies and objectives. Instead, the Investment Manager is selected so that, in aggregate, the risk-adjusted returns produced are expected to meet the Trustees' objectives.

Neither do the Trustees directly incentivise the Investment Manager to make decisions about the medium to long-term performance of an issuer of debt or equity or engage with those issues to improve their performance. The Trustees expect such assessment of performance and engagement to be undertaken as appropriate and necessary to meet the investment objectives of the funds used by the Scheme.

13 Portfolio Turnover Costs

The Trustees expect the Investment Manager to change underlying holdings only to an extent required to meet their investment objectives. The reasonableness of such turnover will vary by fund and change according to market conditions.

The Trustees therefore do not set a specific portfolio turnover target for its strategy or the underlying funds.

The Investment Manager provides information on portfolio turnover and associated costs to the Trustees so that this can be monitored, as appropriate.

14 Monitoring

The Trustees employ Broadstone to assist in monitoring the performance of the Scheme's investment strategy and Investment Manager.

The Investment Manager will supply the Trustees with sufficient information each quarter to enable it to monitor financial and non-financial performance. The Trustees and Broadstone will monitor the Investment Manager's performance against their performance objectives.

The appropriateness of the Investment Manager's remuneration will be assessed relative to market costs for similar strategies, the skill and resources required to manage the strategy, and the success or otherwise a manager has had in meeting its objectives, both financial and non-financial.

The Trustees will consider on a regular basis whether or not the Investment Manager remains appropriate to continue to manage the Scheme's investments.

15 Review of Statement

The Trustees will review this Statement if there is a significant change in the Scheme's investment strategy or a significant change in the regulations that govern pension scheme investment.

For and on behalf of the Wednesbury Pension Scheme

Date: 6th June 2023

Appendix A Investment Strategy Implementation Summary

A.1 Investment Manager

The Trustees entered into a contract with the Investment Manager, LGIM, in November 2010. The Investment Manager undertakes day-to-day investment management of the Scheme's assets. The Investment Manager is authorised and regulated by the Financial Conduct Authority (FCA) under the Financial Services and Markets Act 2000.

A.2 Asset Allocation and Funds

The Trustees use the following funds operated by the Investment Manager, LGIM, with actual and target allocation percentages shown in the table below:

	10 May 2023	Actual Allocation %	Target Allocation %
Hedging Assets			
LDI Funds			
LGIM Self-Sufficiency (Credit) Fixed Short Fund	£5,996,582	12.0%	12.5%
LGIM Self-Sufficiency (Credit) Fixed Long Fund	£19,981,688	40.3%	40.2%
LGIM Self-Sufficiency (Credit) Real Short Fund	£7,879,264	15.9%	15.8%
LGIM Self-Sufficiency (Credit) Real Long Fund	£15,715,866	31.7%	31.4%
Cash Fund			
LGIM Sterling Liquidity Fund	£49,115	0.1%	0.1%
TOTAL INVESTED ASSETS	**£49,622,515**	**100%**	**100%**

These allocations will drift as market conditions change.

A.3 Target Hedging Ratios

The target hedging ratios against the interest rate risk and inflation risk associated with the Scheme's funded solvency liabilities (or asset value where the Scheme is in surplus) are summarised below:

	Target Hedging Ratio
Long-term interest rates	100%
Long-term inflation expectations	100%

A.4 Fund Performance Benchmarks and Objectives

The funds are intended to sustainably produce cash income that matches a typical pension scheme's projected benefit profile, with a view to meeting benefits as they fall due with a high degree of certainty. The self-sufficiency solution makes use of profiled 'self-sufficiency credit funds. These LGIM Self Sufficiency Credit Funds come in four varieties, fixed short, fixed long, real short and real long – to provide protection against nominal and inflation-linked liabilities, as well as short-dated and long-dated liabilities. The funds are designed based on LGIM's view as to the typical assets expected to support self-sufficiency pricing and are benchmarked against typical cashflow profiles for defined benefit pension schemes of various maturities. The portfolio of each fund is constructed out of a liability hedging allocation to hedge against interest rate and inflation risks, and an allocation to corporate bonds to provide additional yield. The exposure to corporate bonds is a 'buy and maintain' corporate bond allocation, where underlying bonds are held to maturity.

A.5 Investment Management Charges

The annual management charges for each of the funds used, based on the assets under management at the date of this Statement, are given below:

Fund	Annual Management Charge
LGIM Self-Sufficiency (Credit) Fixed Short Fund	0.20% p.a.
LGIM Self-Sufficiency (Credit) Fixed Long Fund	0.20% p.a.
LGIM Self-Sufficiency (Credit) Real Short Fund	0.20% p.a.
LGIM Self-Sufficiency (Credit) Real Long Fund	0.20% p.a.
LGIM Sterling Liquidity Fund	0.125% p.a.

The strategy has an overall annual management charge of 0.2% per annum based on total investments as at 10th May 2023.