

STATEMENT OF INVESTMENT PRINCIPLES

**DOWNLAND HOUSING GROUP PENSION & ASSURANCE SCHEME
SEPTEMBER 2020**

Introduction

Under section 35 of The Pensions Act 1995 as amended by section 244 of the Pensions Act 2004 and The Occupational Pension Schemes (Investment Regulations 2005), the Trustees are required to prepare a statement of the principles governing investment decisions for the purposes of the Scheme. This document fulfils that requirement.

In preparing this Statement, the Trustees have obtained advice from the Scheme's Investment Adviser, Mattioli Woods. The Trustees will similarly obtain such advice as appropriate whenever they intend to review or revise the Statement.

In preparing this Statement, the Trustees have consulted the Employer and will do so whenever the Trustees intend to review or revise the Statement. Responsibility for maintaining the Statement and deciding investment policy rests solely with the Trustees.

The Trustees will review this Statement on such occasions as may appear to them to be appropriate.

Scheme description

The Downland Housing Group Pension & Assurance Scheme (the Scheme) is a defined benefit scheme that was established on 1 October 2002. On February 2003 all the assets and liabilities of the preceding scheme of the employer, the Downland Housing Group Limited Section of the Legal and General Pensions Trust were transferred to this scheme. The Scheme is registered under Part 4, Chapter 2 of the Finance Act 2004. The Scheme is closed to new entrants and benefits ceased to accrue with effect from 1 April 2005. It has as its purpose the provision of retirement benefits and death benefits to eligible participants and beneficiaries.

Investment objectives

The Trustees have a duty to invest the assets of the Scheme in the best interests of their members and beneficiaries. The general investment objectives of the Scheme can be summarised as:

- The acquisition of suitable assets of appropriate liquidity that will generate income and capital growth to meet, together with contributions from the employers, the cost of current and future benefits that the Scheme provides as set out in the Trust Deed and Rules.
- To limit the risk of the assets failing to meet the liabilities over the long term.
- To minimise the long-term costs of the Scheme by maximising the return on the assets while having due regard to the preceding objectives.
- To ensure that sufficient assets are available to meet members' benefits as and when they fall due.
- To assist in achieving the long and short term funding objectives described in the Trustees' Statement of Funding Principles.
- To invest Scheme assets so as to obtain the best rate of return compatible with the above

aims while governing exposure to risk (see below).

The greater part of the investments of the Scheme's assets is invested under an advisory mandate by the Investment Advisers in accordance with parameters set out below by the Trustees. The balance of the fund is held in cash to facilitate the smooth operation of the Scheme.

Having taken advice from the Investment Advisers and considered the views of the sponsoring Employer, the Trustees believe that the Scheme should be invested in a diversified range of investment classes targeted to achieve reasonable investment growth without excessive volatility. Based on funding information and asset allocation advice provided by the Actuary using reasonable assumptions, investment information provided by the Investment Manager and after considering the employer covenant, the Trustees believe that targeted investment growth of 5.3% per annum, net of all charges, is both achievable and reasonable and does not require an excessive level of risk to be taken. The Trustees understand that the asset mix required in order to achieve their objectives will change from time to time, as will the targeted level of return itself. The Trustees will also consider the levels of acceptable risk when setting the strategic asset allocation.

The Trustees consider that this policy represents investment in suitable investment classes, is appropriately diversified and provides a reasonable expectation of meeting the above objectives. In normal circumstances, the Trustees would expect the asset allocation to fall within the following ranges:

Investment sector	%
Equities	35–65
Fixed Interest/Credit	10–40
Property	0–20
Cash	0–10
Alternatives	0–30

The assets of the Scheme considered by the Trustees include, but are not limited to, fixed interest to include index-linked government bonds and corporate bonds, equities, private equity, absolute return strategies, commercial property, infrastructure, hedge funds, commodities, structured products, derivatives, currency and cash. As such, assets may be invested in the UK or overseas. All investments are held in pooled collective vehicles.

The Trustees, in conjunction with the Scheme's administrator, will hold sufficient cash to meet the likely expenditure on benefits and expenses from time to time. The Trustees will also hold sufficient assets in liquid investments to meet unexpected cash flow requirements in the majority of foreseeable circumstances.

Investment management, voting rights and engagement activities

In view of the size and nature of the Scheme, the Trustees feel that, for the foreseeable future, it is appropriate for most of the Scheme's assets to be invested in a mixture of collective

investments as determined as part of an advisory mandate held by the appointed Investment Advisers, Mattioli Woods, and invested in accordance with the asset allocation as described above.

The Trustees will review whether this type of investment strategy remains suitable for the Scheme annually, after actuarial valuations and after considering written advice. Decisions relating to the appointment and/or changes to the underlying Investment Managers, or to changes to the strategic asset allocation, will be taken in formal meetings of the Trustees and following advice from the Investment Adviser who will then implement any changes to the funds held upon the agreement of the Trustees. The strategic asset allocation remains under constant review. The Trustees in conjunction with their Scheme Actuary (in relation to strategic asset allocation) and their Investment Advisers review the mix of assets within the portfolio in order to take advantage of opportunities to de-risk, hedge or add more risk dependent on the market environment.

The Trustees and Mattioli Woods are aware of the need for appropriate and suitably diversified investments that recognise the nature of pension scheme liabilities. The Trustees and Mattioli Woods will exercise their powers of investment in such a manner as to give effect to this Statement so far as is reasonably practicable.

The Trustees leave the extent to which social, environmental (including climate risk/opportunities) and governance are taken into account in investment decisions to the discretion of the underlying Investment Managers. The Trustees will periodically review the extent to which social, environmental or ethical considerations are taken into account in investment decisions with their Investment Advisers and its impact in relation to financially material considerations including climate change. The Trustees' policy is to encourage the exercising of rights (including voting rights) attaching to investments, but responsibility for exercising such rights is delegated to those managing the investments. The Trustees will review annually the effectiveness of their Investment Advisers' stewardship in relation to this policy, or more frequently should circumstances require.

The Trustees accept that the assets invested in pooled funds are subject to the underlying Investment Managers' policies on corporate governance. The Trustees are satisfied that this corresponds with their responsibility to invest the assets in the best interests of members and beneficiaries and, in the case of a potential conflict of interest, in the sole interest of their members and beneficiaries.

The Trustees note that members' views on non-financial matters including their ethical views in relation to social and environmental impact and present and future quality of life will not be sought; however, they will be considered if raised by the membership.

In summary, the Trustees' policy in relation to their arrangement with any asset manager is explained as follows:

- (i) how the arrangement with the asset manager incentivises the asset manager to align its investment strategy and decisions with the Trustees' policies

The Trustees accept that the assets invested in pooled funds are subject to the underlying Investment Managers' policies, therefore the asset manager will not be able to directly align their strategy with the Trustees' policy.

- (ii) how that arrangement incentivises the asset manager to make decisions based on assessments about medium to long-term financial and non-financial performance of an issuer of debt or equity and to engage with issuers of debt or equity in order to improve their performance in the medium to long-term;

By using pooled funds, the Trustees are able to easily disinvest and realise their funds from a specific asset manager without penalty or delay, should they underperform or act outside the Trustees' investment objectives, stewardship and environmental, social and governance requirements.

- (iii) how the method (and time horizon) of the evaluation of the asset manager's performance and the remuneration for asset management services are in line with the Trustees' policies
- (iv) how the Trustees monitor portfolio turnover costs incurred by the asset manager and how they define and monitor targeted portfolio turnover or turnover range; and the duration of the arrangement with the asset manager.

The Trustees delegate the review of portfolio costs and investment performance monitoring to their Investment Advisers. Their Investment Advisers report regularly (no less than twice per annum) and make recommendations that incorporate analysis of these factors as part of their agreement with the Trustees.

Risk management

The Trustees recognise a number of risks involved in the investment of the assets of the Scheme. In arriving at their investment strategy, the Trustees have considered the following main risks and will continue to monitor them on a regular basis:

- Mismatching risk – measured through regular monitoring of the expected progression of liabilities relative to the assets and through assessing the development of the actual liability growth relative to the current asset allocation strategy.
- Manager risk – measured by analysing the deviation of future risk and return relative to the Investment Managers' objectives and through the diversification of the Scheme's assets across a range of funds with different styles and through the ongoing monitoring of the manager's performance against their investment objectives.
- Liquidity risk – measured by analysing the cash flow requirements of future payments and by regularly assessing the level of cash held relative to the forecasted level of payments.
- Sponsor risk – measured by regular assessments of the financial strength of the principal employer to support the continuity of the Scheme and to make any deficit payments, and by obtaining a review of the employer's covenants from time to time.
- Political risk – measured by analysing the level of concentration in any one market or

country to avoid the risk of an adverse effect on investment return that could arise from political influence. Also managed by regularly assessing the level of diversification within the asset allocation.

- Fraud – measured, managed and addressed by ensuring that all advisers and third-party service providers are suitably qualified, experienced and regulated, as appropriate.

The Trustees monitor risk capacity (the scheme's ability to absorb or support risks) and risk appetite (the Trustees' or Employer's, as appropriate, readiness to accept a given level of risk) through their integrated risk management procedures. This allows the Trustees to take effective action following regular advice from their Investment Advisers and Scheme Actuary.

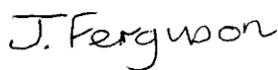
Governance

In compliance with the Financial Services Markets Act 2000, daily management of the underlying assets is delegated to professional Investment Managers who are regulated by the Financial Conduct Authority. They have been selected for their expertise in different specialisations and each manager invests for the Scheme to a specific mandate and guidelines, as agreed by the Investment Adviser and the Trustees. Within each underlying collective fund, the Investment Managers have discretion to buy, sell or retain individual securities in accordance with these guidelines.

The Trustees receive regular reports from Mattioli Woods and meet with its representatives at least twice a year to review the investment performance and processes. Through this process of regular reporting and annual review, the Trustees aim to ensure that the Investment Adviser is performing competently and in compliance with this Statement.



DAVID SHEPHERD



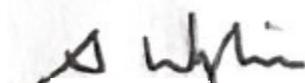
JOYCE FERGUSON



NICOLA TUCKER

Trustees' signatures

Trustees' names



SCOTT WYLIE

On behalf of Investment Adviser

Date 30/9/2020