

Example trustee's annual report and financial statements KPMG Guide 2020 January 2021

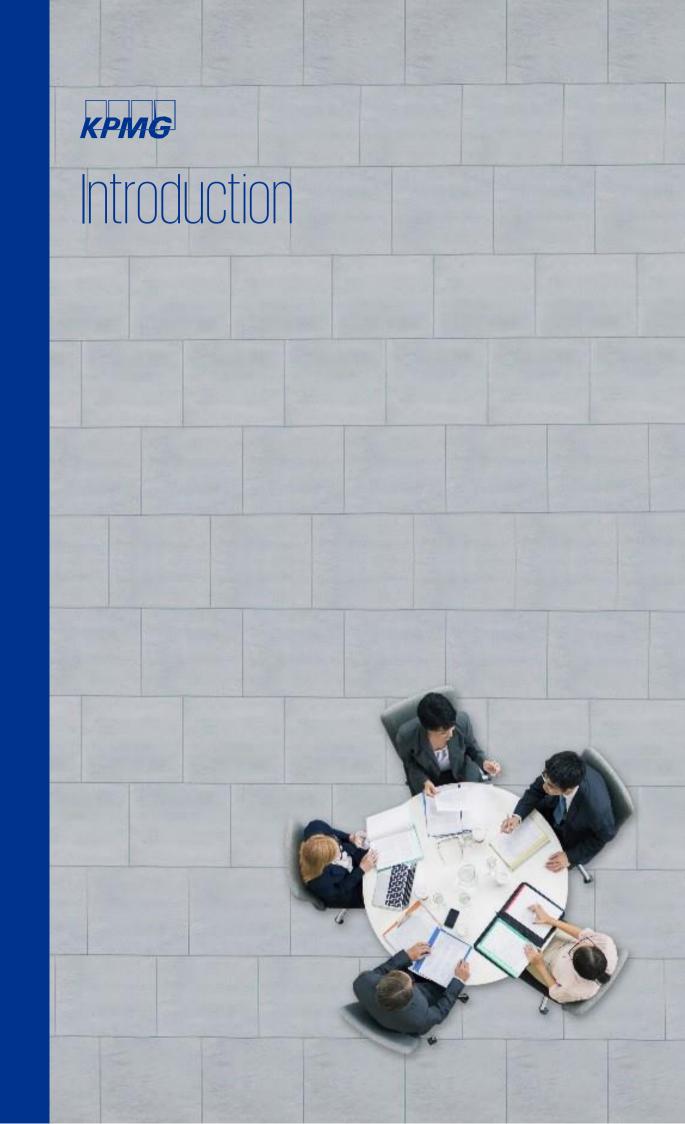
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KPMG Example Accounts Guide 2020

Introduction

Welcome to the 2020 edition of KPMG's guide to pension scheme financial statements. This guide takes into account the changes introduced in the 2018 SORP.

Following the significant amendments introduced by FRS 102 and the 2014 edition of the SORP, the 2018 SORP takes account of amendments to FRS 102 since its inception, amendments to legislation and various, mostly minor, clarifications. These include moving the fair value hierarchy to disclosure on a level 1, 2, 3 basis. Guidance initially prepared by a Pensions Research Accountants Group/Investment Association joint working party looking at practical aspects around investment disclosures is also included. There have not been significant developments in the industry which impact on scheme accounting in the SORP.

This publication has been updated in 2020 to include reference to enhanced disclosures around investments in the trustee's report as required by amendments to the Occupational Pension Scheme (Disclosure of Information) Regulations 2013.

The aim of this publication is to provide a practical guide to assist with pension scheme financial reporting. We hope you find it useful.



Nadia Dabbagh-Hobrow Partner Head of Pensions Assurance

Section 1: Key changes in the 2018 SORP

Key changes to the SORP in 2018 included, in summary:

- A requirement for comparative disclosure, analysed between DB and DC, for the Fund account in hybrid schemes. This may be on the face of the Fund account or in a prominent note.
- Fair value disclosure of investments is required in accordance with the 1, 2, 3 hierarchy.
- Amendments to require that Pooled Investment Vehicles fall within the scope of the concentration
 of investment notes, as required by Regulations.
- Clarification that it is for Common Investment Fund (CIF) trustees to determine whether their CIF falls within the definition of a financial institution, in which case additional disclosures are required by FRS 102.
- Clarification that disclosures may be required even if there is no material uncertainty in relation to going concern to ensure that the accounts give a true and fair view.
- Clarification that FRS 102's disclosure requirements relating to identification of financial statements apply to pension schemes.
- Clarification that the small entity reporting regime under FRS102 does not apply to pension schemes.



Section 2: Example trustee's annual report and financial statements

Section 2 of our Guide sets out an example annual report and financial statements. Some points to note in respect of this example are:

- The trustee's report illustrates what is required by legislation and what is included as examples of best practice reporting by including legislative disclosures in plain text and best practice examples in italics.
- The SORP suggests that the derivative and investment risk disclosures could be combined. We have not sought to do this in our example but this could present opportunities to streamline disclosures in these areas.
- We have cross referenced the investment risk note to the investment strategy commentary in the trustee's report to avoid duplication of reporting
- We have not included note disclosures for items that are typically not material to the financial statements, for example administration expenses and other debtors and creditors. This is to streamline disclosures where appropriate. However, if these items were material to a particular scheme they would need to be separately reported.

Section 3: Pension Scheme Annual Report checklist

Section 3 of our Guide contains a comprehensive disclosure checklist for the trustee's report and financial statements.

Section 4: Future of pension scheme financial reporting

This part of our publication is not intended to be a comprehensive set of example accounts. Instead we have taken the opportunity to take stock of how the changes introduced by FRS 102 have been adopted and to introduce our thoughts on reporting moving forward into the future. This part of the Guide explores permitted flexibilities, building on pension disclosures we have seen emerging combined with best practice in general financial reporting, whilst seeking to make the content of the financial statements more relevant to trustee investment strategy. We have done this by:

- Adopting a format for the notes to the financial statements that groups disclosures by common area, for example, all information about contributions is contained in one note covering accounting policies, numerical analysis and SORP disclosures.
- Disclosing investment market risks by reference to trustee strategic portfolio allocations at a summary level.
- Distinguishing the disclosure of investment market risks from investment credit risks on the basis that market risks relate to fair value and cash flow exposures whereas credit risk relates to security of investments.

We have prepared this section to stimulate discussion and debate which we hope will eventually lead to further improvements in pension scheme financial reporting. However, if you did want to adopt some or all of the disclosures therein we believe they meet the requirements of FRS 102 and the SORP.





Section 1: Key changes to the SORP



Since the 2014 SORP was published the FRC have made a number of amendments to FRS 102 arising from implementation experience and the FRC's first triennial review. There have also been changes to relevant pension legislation, mainly the withdrawal of detailed investment disclosure requirements.

This section sets out the significant amendments.

The Annual Report

This section of the SORP has been updated for relevant legislative changes, mainly in relation to the requirement to prepare a statutory Chair's Statement for qualifying defined contribution arrangements and the removal of the requirement for an auditor's statement on contributions for schemes with more than 20 participating employers.

Statement of Recommended Practice

Scope and purpose

Master trusts have been included in the list of types of pension schemes covered by the SORP.

The application of the SORP has been updated for the amendment to FRS 100 which applies SORPs where the SORP states it is applicable.

Accounting principles, policies and presentation

The approach to disclosure of comparative information has been clarified such that comparative disclosure of columnar analysis in the Fund Account between DB and DC for hybrid schemes is required either on the face of the Fund Account or, if that is impractical, prominently in the notes.

Valuation of assets and liabilities

This section of the SORP has been updated for amendments to FRS 102 in relation to fair value disclosure. The disclosure of asset and liability fair value determination has been updated to reflect the 1, 2, 3 hierarchy, rather than a), b), c), in line with the amendments to FRS 102. The requirements are based on joint guidance issued by the Investment Association and PRAG in May 2016. In practice most schemes have been reporting based on the level 1, 2, 3 hierarchy for some time so this amendment is not expected to result in any significant changes to pension scheme financial reporting.

Concentration of investment risk

An amendment has been made to the SORP to remove an inconsistency between the 2014 SORP and the Audited Accounts Regulations in relation to concentration of risk disclosure for holdings of pooled investment vehicles. This disclosure is required by the Regulations.

Common investment funds

During the development of the 2018 SORP, there was discussion as to whether or not common investment funds (CIFs) met the definition of financial institutions under FRS 102. Ultimately it is possible that they could meet the definition and therefore the SORP has been amended so that the trustee of a CIF must decide whether or not their CIF meets the definition. If the CIF is determined to be a financial institution, the relevant disclosures for financial instruments under FRS 102 (such as liquidity and sensitivity analyses) are required together with the SORP's recommended investment disclosures for pension schemes. If the trustee determines that the CIF is not a financial institution, the 2018 SORP recommends that it follows the financial instrument disclosures (the current practice).

In addition, the revised SORP requires that where CIF accounts are attached to the scheme annual report, fair value or investment risk disclosures in the scheme accounts should include disclosure at



share of CIF level, for example, share of units held.

Going concern

Revisions to the SORP clarify that disclosures may still be required even if there is no material uncertainty in relation to going concern in order for the accounts to give a true and fair view.

The requirements have been updated to provide clarification of appropriate going concern disclosures in the possible different scenarios a scheme may experience in a Pension Protection Fund assessment period.

Identification of the financial statements

A further requirement of the 2018 SORP is disclosure identifying the financial statements in compliance with FRS 102's requirements. These requirements are applicable to pension schemes and the SORP provides relevant guidance.





Section 2: Example trustee's annual report and financial statements

October 2020

ABC Group Pension Scheme Trustee's Annual Report and Financial Statements

Registered number 123456789X

Year ended 5 April 2021



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Trustee and advisers

Principal company

ABC Group plc 12 Grange Place York YE2 3ER

Participating subsidiaries

(until 10 January 2021) DEF Ltd 5 Moors Avenue Gloucester GL3 5AR (until 1 August 2020) GHI Ltd 5 Rainbow Road Ashford Kent AS1 8HY

Corporate Trustee

KPen Trustees Limited **Directors of the Corporate Trustee Company nominated** A Rook B Dane C Payne (resigned 10 March 2021) **Member nominated** D Singer (appointed 10 March 2021) F Kidner (resigned 30 April 2021) G Macdonald **Independent** F Smith (appointed 30 April 2021)

Secretary to the Trustee

E Marshall

Actuary

JK Dunn (to 7 August 2020) Dunn and Partners

P Brown (from 7 August 2020) Brown Consulting Ltd

Auditors

KPMG LLP Administrator

ABC Group Pensions Administration Ltd

Investment managers

Secure Asset Management Limited (SAM) – Defined Benefit Section Trustworthy Asset Management Limited (TAM) – Defined Contribution Section

Custodian

Honest Custody Services Ltd

Annuity provider Sunshine Life Ltd

Investment adviser

Investment Strategies Limited

AVC providers

Smith Investments Ltd Jones & Jones plc

Bankers

XYZ Bank plc

Solicitors

Christie & Holmes LLP

Administration office

ABC Group Pensions Administration Ltd 23 Sun Street London NX9 6XX

Enquiries

Enquiries about the Scheme generally, or about an individual's entitlement to benefit, should be addressed to the Group Pensions Manager at the administration office (ABC Group Pensions Administration Ltd, 23 Sun Street, London, NX9 6XX), where a copy of the Trust Deed and Rules can be inspected. Alternatively, enquiries may be made to: enquiries@ABCGroupPS.co.uk



Trustee's Annual Report

The Trustee presents its Annual Report on the ABC Group Pension Scheme ('the Scheme'), together with the financial statements of the Scheme for the year ended 5 April 2021.

Introduction

Constitution of the Scheme

The ABC Group Pension Scheme provides a defined benefit section governed by a Trust Deed dated 13 March 1976, as amended from time to time, and a defined contribution section introduced by an amendment to the Trust Deed dated 25 March 2002. The Trustee holds Scheme funds on trust to apply them for the purpose of paying pensions and other benefits in accordance with the Trust Deed. The Scheme comprises two sections:

- The Defined Benefit Section (DBS) which provides benefits based on a member's salary and length of service; and
- The Defined Contribution Section (DCS) which provides benefits based on a member's accumulated fund.

Members of both sections are able to make Additional Voluntary Contributions ('AVCs') to secure additional benefits.

Rule changes

On 10 January 2021 changes to the Rules were agreed which:

- Amended the definition of pensionable pay to include overtime earnings;
- Amended the Rules concerning dependants' benefits to increase benefits to those in full time further education; and
- Clarified certain other Rules.

Transfers

All transfer values paid to other pension schemes or credits given in respect of transfer values received from other pension schemes during the year were calculated and verified by the Scheme's Actuary or calculated in accordance with instructions prepared by him, in accordance with statutory regulations.

The Trustee has instructed the Actuary not to take account of discretionary increases in calculating cash equivalents for transfer purposes. No transfers were reduced to less than their cash equivalent value.

Recent developments

On 6 April 2020 the DBS was closed to new entrants with the exception of members transferring in on a bulk transfer from Grove Manufacturing Ltd Pension Scheme (see page 12) and existing members of the DCS, who may transfer to the DBS on their 45th birthday. The Scheme was contracted out of the State pension arrangements until 5 April 2016 from which time it became contracted in.



In addition, on 6 April 2020, the Employer's Southern Division was sold to XYZ plc resulting in 100 DBS active members, who were employed by the Southern Division, becoming deferred members of the Scheme from this date. Past service liabilities remain in the Scheme until finalisation of the transfer value expected in 2021.

A subsidiary, GHI Ltd, withdrew from the Scheme on 1 August 2020. The s75 debt identified relating to the past service benefits of the 3 employees concerned amounted to £15,000. This debt was settled by GHI Ltd during the Scheme year.

On 10 January 2021, a participating subsidiary, DEF Ltd, withdrew from the Scheme. The past service benefits of the employees of DEF Ltd will remain within the Scheme as deferred benefits. However, a deficit has been identified relating to past service benefit accrual. As at the date of these financial statements, the s75 debt has not been determined by the Scheme Actuary, or an estimate been made, as legal opinion is being sought to clarify the Deed and Rules in relation to benefit accrual from 1980 – 1985 for these members. However, DEF Ltd have put £500,000 into an escrow account to offer security against payment of this debt.

Management of the Scheme

The Trustee Directors who served during the year are listed on page 9.

Under the Trust Deed and Rules of the Scheme, Trustee Directors are appointed and may be removed by ABC Group plc.

At least one third of the Trustee Directors are nominated by Scheme members. These member nominated Trustee Directors are elected from the active membership of the Scheme and cease to be eligible as Trustee Directors on leaving employment. Member nominated Trustee Directors can serve for a maximum term of five years after which they must stand down and cannot stand for re-election. Company appointed Trustee Directors can serve until removed by the Company.

During the year the Trustee met five times. All decisions are taken by simple majority with the Chairman having the casting vote.

The Trustee has established the following committees:

- Investment committee (monthly);
- Audit committee (twice annually); and
- Administration and DC committee (quarterly).

The Trustee has delegated the day-to-day management and operation of the Scheme's affairs to professional organisations as set out above.

Financial development of the Scheme

The Financial Statements of the Scheme for the year ended 5 April 2021, as set out on pages 22 to 39, have been prepared and audited in accordance with Sections 41(1) and (6) of the Pensions Act 1995. A summary of the Scheme's Financial Statements is set out in the table below.



| | DBS | DBS | DCS | DCS | Total | Total |
|--|----------|---------|-------|-------|----------|---------|
| | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 |
| | £'000 | £'000 | £'000 | £'000 | £'000 | £'000 |
| Member related income | 6,733 | 320 | 166 | 153 | 6,899 | 473 |
| Member related payments | (10,780) | (9,740) | (104) | (73) | (10,884) | (9,813) |
| Net (withdrawals)/additions from dealings with members | (4,047) | (9,420) | 62 | 80 | (3,985) | (9,340) |
| Net returns on investments | 11,785 | 3,697 | 93 | 20 | 11,878 | 3,717 |
| Net increase/(decrease) in fund | 7,738 | (5,723) | 155 | 100 | 7,893 | (5,623) |
| Transfer between sections | 4 | 2 | (4) | (2) | - | - |
| Net assets at start of year | 73,199 | 78,920 | 645 | 547 | 73,844 | 79,467 |
| Net assets at end of year | 80,941 | 73,199 | 796 | 645 | 81,737 | 73,844 |

DBS

During the year member income received into the Scheme increased to £6.7 million compared with £0.3 million for the prior year. This increase is largely due to a group transfer in respect of members of the Grove Manufacturing Ltd Pension Scheme of £6 million. In addition, and in accordance with actuarial advice, the Employer has recommenced contributions to the DBS. Member payments remained broadly consistent year on year at £10.8 million.

The net returns on investments comprised change in market value of investments of £7.6 million (prior year: £0.5 million) and investment income of £4.5 million (prior year: £3.5 million) offset by investment management expenses of £0.4 million (prior year: £0.4 million).

The net assets of the DBS amounted to £80.9 million at 5 April 2021 (2020: £73.2 million).

DCS

Member related income amounted to £166,000 compared with £153,000 for the prior year, mainly reflecting the increase in DCS members during the year. Member payments increased in 2021 to £104,000 from £73,000. The majority of this increase was due to annuity purchases in the year of £45,000 (prior year: £nil). The DCS does not pay pensions as annuities to fund pension benefits are bought in the name of the member.

Assets of the DCS are invested in pooled investment vehicles which reported a net return of £93,000 for the year compared to £20,000 for the previous year.

The net assets of the DCS amounted to £796,000 at 5 April 2021 (2020: £645,000).

Actuarial review

The Financial Statements set out on pages 22 to 39 do not take account of the liabilities to provide pension benefits which fall due after the year end. In respect of the DBS, these liabilities are considered by the Scheme Actuary who carries out an actuarial valuation of such liabilities every three years. This valuation considers the funding position of the DBS and the level of contributions payable. The most recent actuarial valuation was carried out at 5 April 2019. The results of this valuation confirmed that Employer contributions to the DBS should recommence from 6 April 2020 which, as mentioned above, they duly did. In consultation with the Scheme Actuary, the Employer has also agreed to pay deficit funding contributions in 2021, 2022 and 2023 of £20,000, £50,000 and £100,000 respectively to improve the short term funding position of the Scheme such that the Scheme's assets cover accrued past service liabilities. The Employer has deposited £180,000 in an escrow account, the terms of which allow the Trustee access to these funds if the Employer fails to meet the deficit funding under the recovery plan. The next valuation of the DBS is due as at 5 April 2022.



During the year, 206 members transferred into the Scheme from the Grove Manufacturing Ltd Pension Scheme. The transfer value of £6 million was sufficient to cover these members' past service liabilities and as a result the group transfer had no impact on the funding position of the Scheme.

The formal actuarial certificate required by statute to be included in this Annual Report from the Scheme Actuary appears on page 42. In addition, as required by FRS 102, the Trustee has included the Report on Actuarial Liabilities on page 43, which forms part of the Trustee's Report.

Scheme Actuary

JK Dunn, the Scheme Actuary, resigned on 7 August 2020. The Trustee filled the vacancy in the office of Scheme Actuary by appointing P Brown on the same day.

As required by Regulations made under the Pensions Act 1995, JK Dunn confirmed in his notice of resignation that he knew of no circumstances connected with the resignation that significantly affected the interests of the members, prospective members or beneficiaries of the Scheme.

Membership

The membership of the Scheme at the beginning and end of the year and changes during the year are set out below.

| Active members | | |
|---|-------|------|
| | DBS | DCS |
| Contributory membership at start of year | 445 | 108 |
| Group transfer in | 206 | - |
| New entrants in year | - | 63 |
| Transfers between sections | 1 | - |
| | 652 | 171 |
| Leavers and exits during the year: | | |
| - Retirements | (21) | (1) |
| Fully commuted retirement | (1) | - |
| — Death | (1) | - |
| — Deferred pensioners | (152) | (32) |
| — Transfers-out | (1) | - |
| — Transfers between sections | - | (1) |
| - Refunds | (5) | (19) |
| | (181) | (53) |
| Contributory membership at end of year | 471 | 118 |

During the year, 206 new members joined the Scheme as a result of a group transfer from the Grove Manufacturing Ltd Pension Scheme following the acquisition of Grove Manufacturing by ABC Group plc.

At 5 April 2021 there were 765 (2020: 821) employees covered for life assurance benefits only, on a non-contributory basis.



| Pensioners | |
|--|-------|
| | DBS |
| In payment at start of year | 2,081 |
| New pensioners in year resulting from: | |
| - Retirement of active members | 21 |
| - Retirement of deferred members | 14 |
| - Dependants' pensions | 5 |
| | 40 |
| Cessation of benefits | (70) |
| In payment at end of year | 2,051 |

Included within pensioners are 8 (2020:8) pensioners whose pensions are paid from annuities held in the name of the Trustee. For members retiring from the DCS, the Trustee purchases annuities in the member's name therefore the DCS has no pensioner members.

| Deferred members | | | | | |
|--|-------|------|--|--|--|
| | DBS | DCS | | | |
| At start of year | 700 | 30 | | | |
| New deferred pensioners | 152 | 32 | | | |
| | 852 | 62 | | | |
| Cessation of deferred pensions resulting from: | | | | | |
| — Retirements | (14) | - | | | |
| — Full commutations | (127) | (24) | | | |
| — Transfers-out | (1) | - | | | |
| | (142) | (24) | | | |
| At end of year | 710 | 38 | | | |

Pension increases

Pensions in payment were increased by 2.0% effective from 1 June 2020. Pensions commencing in the 12 months preceding 1 June 2020 received an increase based on the 2.0%, pro-rated for the length of time the pension had been in payment.

The pension increases referred to above do not apply to that element of the pensions in payment representing any Guaranteed Minimum Pensions (GMPs), which the Scheme is required to provide as a consequence of contracting out of the State pension arrangements for the DBS, as these increases are provided by the State. GMPs earned after April 1988 will be increased by the Scheme in line with inflation, as required by legislation, up to a maximum of 3% per annum. GMPs relate to service accrued from April 1978 to April 1997, when contracting out arrangements were changed and GMP ceased to apply. Contracting out arrangements ceased from 6 April 2016.

Deferred pensions have been increased in line with statutory requirements.

All increases were in accordance with the Trust Deed and Rules of the Scheme or legislative requirements. There were no discretionary increases awarded in the year.



Custody

Custodian services are provided by Honest Custody Services Ltd. In accordance with normal practice, the Scheme's investments are registered in the name of the custodian's own nominee company with designation for the Scheme. The Trustee reviews the internal control reports produced by the custodian and regularly reconciles the custodian's records of securities and cash to the investment managers' records.

The Trustee has implemented mandates ensuring that rights attaching to Scheme investments are acted upon. This includes active voting participation and a requirement to consider environmental, social and governance (ESG) issues when formulating the Scheme's investment strategy.

Investment management

The Trustee delegates the day-to-day management to professional external investment managers, the names of which are listed on page 9. The Trustee sets the investment strategy for the Scheme after taking advice from the Scheme's Investment Adviser. The Trustee has put mandates in place with their investment managers which implement this strategy.

In accordance with s35 of the Pensions Act 1995, a Statement of Investment Principles has been prepared by the Trustee which incorporates the investment strategy. A copy of the Statement may be obtained online or from the Secretary to the Trustee at the Administration Office.

Investment managers are remunerated by fees based on a percentage of funds under management. There are no performance related fee arrangements.

The overriding objective of the Trustee is for the Scheme to provide sufficient returns from current and future investments to secure Scheme benefits as set out in the Scheme Deed and Rules (for the DB section) and to maximise returns whilst providing investment choice and security (for the DC section). As a consequence, investments are selected, retained and realised in accordance with the Trustee's investment strategy, as advised to the investment managers, on the basis of financially material considerations in order to achieve this overall objective. The Trustee ensures that investment managers have appropriate knowledge and experience to undertake management of the Scheme portfolio. The Trustee recognises that over the time horizon of the Scheme, ESG factors including climate change could impact investment performance. The investment managers are required to report on a monthly basis to the Trustee detailing material transactions undertaken to align the portfolio of the DB section with the Trustee's strategy. Members of the DC section select their own investment portfolio.

The Trustee has considered the extent to which non-financial matters, including ESG factors, should be taken into account in the selection, retention and realisation of investments. As noted above, the Trustee believes that its overriding responsibility is to act in the best financial interests of the Scheme members and, accordingly, it does not propose to develop any specific policies considering non-financial matters in setting investment strategy.

The Trustee has given the investment managers clear direction on their key principles and concerns regarding corporate governance and expects them to exercise their influence to promote scheme members' interests and high standards of corporate governance. The investment managers are required to report the exercise of voting (or other asset owner) rights on a monthly basis. Investment manager voting reports are reviewed and discussed at Trustee meetings.

The Trustee's Investment Adviser monitors corporate governance activities of investment managers and investee companies and reports findings to the Trustee on a monthly basis. Should any activity come to the Trustee's attention which is not in accordance with the Trustee's stated principles of preserving shareholder value over the longer term, then this would be raised in writing with the party concerned.

Investment managers are incentivised to align their investment strategy and decisions with the Trustee's policies through their adoption of automated system controls (for example preventing investment in certain sectors in accordance with Trustee's policy), periodic portfolio review,



realignment and regular reporting to the Trustee. The Trustee raises any concerns it may have with investment managers and adjustments are made to the portfolio accordingly. Investment manager service level agreements include targeted timeframes for portfolio realignments in such situations. Performance reviews of investment managers are benchmarked against targeted service outcomes.

The Trustee ensures these arrangements incentivise the investment managers to make decisions based on assessments about medium to long-term performance and to engage with security issuers to improve medium to long-term performance by requiring regular feedback and analysis of actions taken. Feedback obtained includes analysis of the rationale for investment realignments including investment manager assessments of future performance and details of significant engagement activity undertaken. Investment manager reports are subject to in-depth review by the Scheme's Investment Adviser. The Trustee is able to challenge investment managers if investment activity, including engagement, is not in line with the Trustee's policy.

Reporting and review of the investment managers' actions by the Scheme's investment adviser on a monthly basis ensures that the Trustee is able to evaluate investment manager performance and consider remuneration in line with the Trustee's own policies.

Regular investment manager reports to the Trustee include analysis of portfolio turnover costs. The Trustee has, after taking advice from their Investment Adviser, defined targeted portfolio turnover (which may be expressed in terms of a range rather than a specific target) which is monitored by review of monthly investment manager reports.

All investment management mandates are set for an initial period of 3 years, with a three yearly review period thereafter.

DBS

The main investment objective of the DBS is to maintain a portfolio of suitable assets of appropriate liquidity which will generate investment returns to meet, together with future contributions, the benefits of the DBS payable under the Trust Deed and Rules as they fall due.

The Trustee sets the investment strategy for the DBS taking into account considerations such as the strength of the Employer covenant, the long term liabilities and the funding agreed with the Employer. The investment strategy is set out in its Statement of Investment Principles (SIP).

The current strategy is to hold broadly:

- 60% in investments that move in line with the long term liabilities of the Scheme. This is referred to as Liability Driven Investment (LDI) and comprises UK and overseas government and corporate bonds and interest rate swaps the purpose of which is to hedge against the impact of interest rate movement on long term liabilities.
- 40% in return seeking investments comprising UK and overseas equities, equity futures, investment property, hedge funds and private equity.
- 15% of scheme investments in overseas currencies. To achieve this the Trustee has put in place a currency hedging strategy using forward foreign exchange rates.

The actual allocations will vary from the above due to market price movements and intervals between rebalancing the portfolio which takes place quarterly. Actual allocations at the Scheme's year end are shown below:

| | 2021 | 2020 |
|----------------------------|------|------|
| | % | % |
| LDI portfolio | 63 | 59 |
| Return Seeking portfolio | 37 | 41 |
| | 100 | 100 |
| Overseas Currency exposure | 17 | 14 |



The Trustee invests in segregated portfolios, pooled investment vehicles and derivative contracts. The Trustee has authorised the use of derivatives by the investment managers for efficient portfolio management purposes and to reduce certain investment risks. The principal investment in derivatives is interest rate and inflation swaps in the LDI portfolio and futures in the return seeking portfolio.

The nature and disposition of the DBS investments are set out below, together with the actual allocation of investments at 5 April 2021, with pooled investment vehicles and equity derivatives analysed by underlying economic exposure:

| Asset Class | Segregated Funds | Pooled Investment Vehicles | Derivatives | Total | % |
|---|---------------------|----------------------------------|-------------|--------|------|
| | £000 | £000 | £000 | £000 | |
| LDI: | | | | | |
| Fixed interest and interest/inflation swaps | 48,306 | 2,500 | 242 | 51,048 | 63.1 |
| Return Seeking: | | | | | |
| — Equities (UK and overseas) | 20,636 | 3,218 | 358 | 24,212 | 29.9 |
| - Absolute Return | 325 | 30 | - | 355 | 0.4 |
| - Property | 4,145 | 503 | - | 4,648 | 5.8 |
| — Private Equity (PE) | - | 320 | - | 320 | 0.4 |
| — Other | 580 | - | (270) | 310 | 0.4 |
| Total | 73,992 | 6,571 | 330 | 80,893 | 100 |

The Trustee regards all the investments of the DBS as readily marketable, other than the PE fund.

The DBS investments, managed by Secure Asset Management Limited, achieved an annual return of 15.0% over the year to 5 April 2021 and 13.8% in the three years to 5 April 2021. This compares to the Scheme specific benchmark returns of 14.5% and 14.2% for one and three years respectively.

DCS

The investment objective of the DCS is to offer investment choice to members whilst maximising investment returns and providing an acceptable level of security. To this end, members may make a choice from the following white label investment funds, all of which are managed by Trustworthy Asset Management (TAM) Limited:

- ABC Scheme Equity
- ABC Scheme Bonds
- ABC Scheme Cash
- ABC Scheme Diversified Growth

These investment funds are in the form of unitised insurance policies with TAM Ltd. The Trustee regularly reviews the investment performance of the funds against appropriate benchmarks. The overall return for the DCS over the year to 5 April 2021 was 13% and for the three years to 5 April 2021 was 15%.

The performances of the investment funds can be analysed as follows:



| Asset Type | Value | Investment performance | Investment performance |
|--|-------|---------------------------|---------------------------|
| | £000 | Over 1 year % | Over 3 years % |
| ABC UK Equity Tracker Pension Fund | 606 | 13 | 16 |
| ABC Corporate Bond Pension Fund | 125 | 14 | 14 |
| ABC Cash Deposit & Treasury Pension Fund | 52 | 1 | 1 |
| ABC Diversified Growth Pension Fund | 32 | 5 | 5 |
| Total | 815 | 13 | 15 |

The DCS unit funds are priced and traded daily by the investment manager. The Trustee regards the DCS investments as readily marketable.

Implementation Statement

Please refer to SI 2013/2734 The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 regarding the content of the Implementation Statement.

Additional Voluntary Contributions (AVCs)

The Scheme provides for members to pay Additional Voluntary Contributions (AVCs) to increase their benefit entitlement at retirement. Such contributions attract tax relief, subject to HMRC limits, and provide increased benefits. AVCs for the DCS are invested within the DCS main fund and for the DBS separately in the form of unit-linked or with-profits contracts with Smith Investments Ltd and Jones and Jones plc.

The AVC assets held at the year end and their respective investment performances are set out below:

| | Value | Investment performance | Investment performance |
|--------------------------------------|-------|---------------------------|---------------------------|
| | £000 | Over 1 year % | Over 3 years % |
| DBS | | | |
| Smith Investments Ltd | 153 | 7 | 6 |
| Jones & Jones plc | 163 | 4 | 6 |
| DCS | | | |
| Trustworthy Asset Management Limited | 38 | 11 | 12 |

Self-investment and breach of the Statement of Investment Principles

The Statement of Investment Principles prohibits the Scheme from holding shares in ABC Group plc. Due to an oversight by Secure Asset Management Limited the Scheme purchased 20,000 shares in ABC Group plc in December 2020 for a cost of £2 million. When this error came to the Trustee's attention they instructed the investment manager to dispose of the holding as soon as practicable. At the year end the Scheme held an investment of 10,987 ABC Group plc ordinary shares amounting to 1.5% of the net assets of the Scheme. These shares were all disposed of in May 2021.

For and on behalf of KPen Trustees Limited

A. Rook

16 September 2021



The ABC Group Pension Scheme (the 'Scheme') Chair's Statement

Please refer to TPR guidance regarding the content of the Chair's Statement.



Statement of Trustee's Responsibilities for the Financial Statements

The audited financial statements, which are to be prepared in accordance with UK Generally Accepted Accounting Practice (UK GAAP), including FRS 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland, are the responsibility of the Trustee. Pension scheme regulations require the Trustee to make available to scheme members, beneficiaries and certain other parties, audited financial statements for each scheme year which:

(i) show a true and fair view of the financial transactions of the scheme during the scheme year and of the amount and disposition at the end of the scheme year of the assets and liabilities, other than liabilities to pay pensions and benefits after the end of the scheme year; and

(ii) contain the information specified in the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, including a statement whether the accounts have been prepared in accordance with the Statement of Recommended Practice Financial Reports of Pension Schemes.

The Trustee has supervised the preparation of the financial statements and has agreed suitable accounting policies, to be applied consistently, making estimates and judgements on a reasonable and prudent basis. It is also responsible for:

- Assessing the Scheme's ability to continue as a going concern, disclosing, as applicable, matters related to going concern;
- Using the going concern basis of accounting unless it either intends to wind up the Scheme, or has no realistic alternative but to do so; and
- Making available each year, commonly in the form of a Trustee's annual report, information about the Scheme prescribed by pensions legislation, which it should ensure is consistent with the financial statements it accompanies.

The Trustee also has certain responsibilities in respect of contributions which are set out in the Statement of Trustee's Responsibilities accompanying the Trustee's Summary of Contributions.

The Trustee is responsible for such internal control as it determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error, and has a general responsibility for ensuring that adequate accounting records are kept and for taking such steps as are reasonably open to it to safeguard the assets of the Scheme and to prevent and detect fraud and other irregularities.



KPMG LLP 1 Church Street Newtown Shire, AB1 3CD

Independent Auditor's Report to the Trustee of the ABC Group Pension Scheme

Report to be included here



Fund Account

| | Notes | DBS | DCS | Total | DBS | DCS | Total |
|--|-------|----------|-------|----------|---------|-------|---------|
| | | 2021 | 2021 | 2021 | 2020 | 2020 | 2020 |
| | | £′000 | £′000 | £′000 | £′000 | £′000 | £'000 |
| Contributions and benefits | | | | | | | |
| Contributions receivable: | 4 | | | | | | |
| employer | | 351 | 67 | 418 | - | 66 | 66 |
| employee | | 339 | 83 | 422 | 319 | 81 | 400 |
| Individual transfers in | | 2 | 16 | 18 | 1 | 6 | 7 |
| Group transfer in | 5 | 6,016 | - | 6,016 | - | - | - |
| Other income | | 25 | - | 25 | - | - | - |
| | | 6,733 | 166 | 6,899 | 320 | 153 | 473 |
| Benefits payable | 6 | (10,685) | (45) | (10,730) | (9,629) | - | (9,629) |
| Payments to and on account of leavers | | (33) | (47) | (80) | (52) | (54) | (106) |
| Other payments | | (34) | (4) | (38) | (30) | (7) | (37) |
| Administrative expenses | | (28) | (8) | (36) | (29) | (12) | (41) |
| | | (10,780) | (104) | (10,884) | (9,740) | (73) | (9,813) |
| Net (withdrawals)/additions from dealings with members | | (4,047) | 62 | (3,985) | (9,420) | 80 | (9,340) |
| Returns on investments | | | | | | | |
| Investment income | 7 | 4,587 | - | 4,587 | 3,574 | - | 3,574 |
| Change in market value of investments | 16 | 7,585 | 98 | 7,683 | 510 | 26 | 536 |
| Investment management expenses | | (373) | (5) | (378) | (375) | (6) | (381) |
| Taxation | 8 | (14) | - | (14) | (12) | - | (12) |
| Net returns on investments | | 11,785 | 93 | 11,878 | 3,697 | 20 | 3,717 |
| Net increase/(decrease) in the fund during the year | | 7,738 | 155 | 7,893 | (5,723) | 100 | (5,623) |
| Transfer between sections Net assets of the Scheme at 6 | 9 | 4 | (4) | - | 2 | (2) | |
| April | | 73,199 | 645 | 73,844 | 78,920 | 547 | 79,467 |
| Net assets of the Scheme at 5 April | | 80,941 | 796 | 81,737 | 73,199 | 645 | 73,844 |

The notes on pages 25 to 39 form part of these Financial Statements.



Statement of Net Assets (available for benefits)

| | Notes | 2021 | 2020 |
|---|-------|--------|--------|
| | | £'000 | £'000 |
| Defined Benefit Section | | | |
| Investment assets: | 16 | | |
| Equities | | 20,636 | 17,411 |
| Bonds | | 48,306 | 44,224 |
| Property | | 4,145 | 3,294 |
| Pooled investment vehicles | 10 | 6,571 | 6,990 |
| Derivatives | 11 | 355 | 345 |
| Longevity swap | 12 | 3 | 3 |
| Insurance policies – annuities | 13 | 350 | 344 |
| Special Purpose Vehicle | 14 | 202 | 203 |
| AVC investments | 15 | 316 | 260 |
| Cash | | 27 | 26 |
| Other investment balances | 18 | 407 | 314 |
| | | 81,318 | 73,414 |
| Investment liabilities: | | | |
| Derivatives | 11 | (25) | (13) |
| Other investment balances | 18 | (400) | (307) |
| Total investments | | 80,893 | 73,094 |
| Current assets | | 60 | 105 |
| Current liabilities | | (12) | |
| Total net assets of DBS | | 80,941 | 73,199 |
| Defined Contribution Section | | | |
| Investment assets: | 16 | | |
| Pooled investment vehicles | 10 | 815 | 695 |
| Current assets | | 7 | 47 |
| Current liabilities | | (26) | (97) |
| Total net assets of DCS | | 796 | 645 |
| Total net assets of the Scheme at 5 April | | 81,737 | 73,844 |

The notes on pages 25 to 39 form part of these Financial Statements.



The Financial Statements summarise the transactions of the Scheme and deal with the net assets at the disposal of the Trustee. They do not take account of obligations to pay pensions and benefits which fall due after the end of the Scheme year. The actuarial position of the DBS, which does take account of such obligations, is dealt with in the Report on Actuarial Liabilities included on page 43 and these Financial Statements should be read in conjunction with that Report.

Signed for and on behalf of the Trustee of the ABC Group Pension Scheme on 16 September 2021.

A Rook

B Dane



Notes (forming part of the Financial Statements)

1. Basis of preparation

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

2. Identification of the financial statements

The Scheme is established as a trust under English law. The address for enquiries about the Scheme is included in the Trustee's Report.

3. Accounting policies

The principal accounting policies of the Scheme are as follows:

a) Investments

- i. Investments are included at fair value.
- ii. The majority of listed investments are stated at the bid price at the date of the Statement of Net Assets.
- iii. Fixed interest securities are stated at their clean prices. Accrued income is accounted for within investment income.
- iv. Unquoted securities are included at fair value estimated by the Trustee based on advice from the investment manager.
- v. Pooled investment vehicles are stated at bid price for funds with bid/offer spreads, or single price where there are no bid/offer spreads as provided by the investment manager.
- vi. Properties are included at open market value as at 5 April 2019 determined in accordance with the Royal Institution of Chartered Surveyors' Appraisal and Valuation Standards and the Practice Statement contained therein. The properties have been valued by George and Co Ltd, Chartered Surveyors, who have relevant professional qualifications and recent experience in the locations and class of the investment properties held by the Scheme.
- vii. Annuities purchased in the name of the Trustee which fully provide the pension benefits for certain members are included in these Financial Statements at the amount of the related obligation, determined using the most recent Scheme Funding valuation assumptions and methodology. Annuity valuations are provided by the Scheme Actuary. Annuities are issued by Sunshine Life Ltd.
- viii. Derivatives are stated at fair value.
 - Exchange traded derivatives are stated at fair value determined using market quoted prices.
 - Swaps are valued taking the current value of future cash flows arising from the swap determined using discounted cash flow models and market data at the reporting date.
 - Over the counter (OTC) derivatives are stated at fair value using pricing models and relevant market data as at the year end date.
 - Forward foreign exchange contracts are valued by determining the gain or loss that would arise from closing out the contract at the reporting date by entering into an equal and opposite contract at that date.
 - All gains and losses arising on derivative contracts are reported within 'Change in Market



Value'.

- Receipts and payments arising from derivative instruments are reported as sale proceeds or purchase of investments.
- ix. Repurchase and Reverse Repurchase arrangements

Under repurchase (repo) arrangements, the Scheme continues to recognise and value the securities that are delivered out as collateral and includes them in the Financial Statements. The cash received is recognised as an asset and the obligation to pay it back is recognised as a liability.

Under reverse repurchase (reverse repo) arrangements, the Scheme does not recognise the collateral securities received as assets in its Financial Statements. The Scheme does recognise the cash delivered to the counterparty as a receivable in the Financial Statements.

- x. Longevity swaps are valued on a fair value basis based on the expected future cash flows arising under the swap discounted using market interest rates and taking into account the risk premium inherent in the contract.
- xi. Special Purpose Vehicles are valued on a fair value basis based on expected future cashflows arising from the Vehicle discounted using market interest rates. Collateral received as security is not recognised in the Financial Statements. Receipts arising from Special Purpose Vehicles are accounted for within sale proceeds of investments.
- b) Investment income
 - i. Dividends from quoted securities are accounted for when the security is declared ex-div.
 - ii. Rents are earned in accordance with the terms of the lease.
 - iii. Interest is accrued on a daily basis.
 - iv. Investment income is reported net of attributable tax credits but gross of withholding taxes which are accrued in line with the associated investment income. Irrecoverable withholding taxes are reported separately as a tax charge.
 - v. Investment income arising from the underlying investments of the pooled investment vehicles is rolled up and reinvested within the pooled investment vehicles. This is reflected in the unit price and reported within 'Change in Market Value'.
 - vi. Receipts from annuity policies held by the Trustee to fund benefits payable to Scheme members are included within investment income on an accruals basis.
- c) Foreign currencies

The functional and presentational currency of the Scheme is Sterling. Balances denominated in foreign currencies are translated into Sterling at the rate ruling at the year end date. Asset and liability balances are translated at the bid and offer rates respectively. Transactions denominated in foreign currencies are translated at the rate ruling at the date of the transaction. Differences arising on investment balance translation are accounted for in the change in market value of investments during the year.

- d) Contributions
 - i. Employee normal contributions are accounted for when deducted from pay, with the exception of contributions deducted from auto-enrolled members during the opt out period which are accounted for on the earlier of receipt or the expiry of the opt out period. Employer normal contributions which are expressed as a rate of salary are accounted for on the same basis as employees' contributions, otherwise they are accounted for in the period they are due under the Schedule of Contributions.
 - ii. Employer augmentation contributions are accounted for in accordance with the agreement under which they are being paid.
 - iii. Employer deficit funding contributions are accounted for on the due dates on which they are



payable in accordance with the Schedule of Contributions and Recovery Plan under which they are being paid.

- iv. Employer s75 debt contributions are accounted for when a reasonable estimate of the amount due can be determined.
- e) Payments to members
 - i. Benefits are accounted for in the period in which they fall due for payment. Where there is a choice, benefits are accounted for in the period in which the member notifies the Trustee of his decision on the type or amount of benefit to be taken or, if there is no member choice, they are accounted for on the date of retirement or leaving. Benefits taken are reported gross of any tax settled by the scheme on behalf of the member.
 - ii. Opt outs are accounted for when the Scheme is notified of the opt out.
 - iii. Individual transfers in or out are accounted for when paid or received which is normally when member liability is accepted/discharged.
 - iv. Group transfers are accounted for in accordance with the terms of the transfer agreement.
- f) Expenses.

Expenses are accounted for on an accruals basis. The Scheme bears all the costs of administration. Direct costs are charged to the section to which they relate. Indirect costs are allocated between sections based on an allocation methodology agreed by the Trustee.

4. Contributions receivable

| | DBS | DCS | Total |
|------------------------------------|-------|-------|-------|
| | | 2021 | |
| | £'000 | £'000 | £'000 |
| Employer: | | | |
| Normal | 285 | 67 | 352 |
| Augmentation | 5 | - | 5 |
| Deficit Funding | 20 | - | 20 |
| s75 debt | 15 | - | 15 |
| Other | 26 | - | 26 |
| Members: | | | |
| Normal | 285 | 67 | 352 |
| Additional Voluntary Contributions | 54 | 16 | 70 |
| | 690 | 150 | 840 |
| | DBS | DCS | Total |
| | | 2020 | |
| | £'000 | £'000 | £'000 |
| Employer: | | | |
| Normal | - | 66 | 66 |
| Augmentation | - | - | - |
| Deficit funding | - | - | - |
| s75 debt | - | - | - |
| Other | - | - | - |
| Members: | | | |
| Normal | 265 | 66 | 331 |
| Additional Voluntary Contributions | 54 | 15 | 69 |



| DBS | DCS | Total |
|-------|-------|-------|
| | 2020 | |
| £'000 | £'000 | £'000 |
| | | |

Deficit funding contributions are being paid by the Employer into the Scheme for a period of three years in accordance with a Recovery Plan in order to improve the Scheme's funding position. The amounts to be paid are:

2021: £20,000

2022: £50,000

2023: £100,000

Employer DC normal contributions include £50,000 (2020: £49,000) of contributions payable to the Scheme under salary sacrifice arrangements made available to certain members by the Employer.

A subsidiary, GHI Ltd, withdrew from the Scheme on 1 August 2020. The s75 deficit determined amounted to £15,000. This debt was settled by GHI Ltd during the Scheme year.

A further s75 debt has arisen relating to the withdrawal of DEF Ltd from the Scheme. The debt cannot be reasonably estimated until the benefit accrual rights of the relevant employees have been established.

5. Group transfer in

The group transfer in of £6.016 million represents the assets transferred to the Scheme in respect of members of the Grove Manufacturing Ltd Pension Scheme who transferred in on 1 February 2021. The bulk transfer comprised £6 million of investment assets and £16,000 cash.

6. Benefits payable

| | DBS | DCS | Total |
|--|--------|-------|--------|
| | | 2021 | |
| | £'000 | £'000 | £'000 |
| Pensions | 10,345 | - | 10,345 |
| Commutations and lump sum retirement benefits | 245 | - | 245 |
| Purchase of annuities | - | 45 | 45 |
| Lump sum death benefits | 75 | - | 75 |
| Taxation where lifetime or annual allowance exceeded | 20 | - | 20 |
| | 10,685 | 45 | 10,730 |

| | DBS | DCS | Total |
|--|-------|-------|-------|
| | | 2020 | |
| | £'000 | £'000 | £'000 |
| Pensions | 9,379 | - | 9,379 |
| Commutations and lump sum retirement benefits | 250 | - | 250 |
| Purchase of annuities | - | - | - |
| Lump sum death benefits | - | - | - |
| Taxation where lifetime or annual allowance exceeded | - | - | - |
| | 9,629 | - | 9,629 |



Taxation arising on benefits paid or payable is in respect of members whose benefits exceeded the lifetime or annual allowance and who elected to take reduced benefits from the Scheme in exchange for the Scheme settling their tax liability.

7. Investment income

| | 2021 | 2020 |
|--|-------|-------|
| DBS | £′000 | £′000 |
| Dividends from equities | 1,413 | 379 |
| Income from bonds | 2,850 | 2,865 |
| Income from pooled investment vehicles | 224 | 222 |
| Net rental income | 70 | 70 |
| Interest on cash deposits | 1 | 1 |
| Annuity income | 24 | 35 |
| Stock lending | 5 | 2 |
| | 4,587 | 3,574 |

Investment income shown above reflects income earned by investments within the DBS. All income earned on pooled investment units held by the DCS is accounted for within the value of those funds.

Overseas investment income is stated gross of withholding taxes. Irrecoverable withholding taxes are reported under 'Taxation' in the Fund Account. Net rental income is stated after deduction of £10,000 (2020: £10,000) of property related expenses.

8. Tax

The ABC Group Pension Scheme is a registered pension scheme for tax purposes under the Finance Act 2004. The Scheme is therefore exempt from taxation except for certain withholding taxes relating to overseas investment income. Tax charges are accrued on the same basis as the investment income to which they relate (see Note 3 (b) (iv) and Note 7 above).

9. Transfers between sections

Under the terms of the Scheme Trust Deed and Rules, members have the option to transfer into the DBS on the Scheme anniversary date following their 45th birthday.

10. Pooled Investment Vehicles (PIVs)

DBS

The DBS holdings of PIVs are analysed below:

| | 2021 | 2020 |
|----------------------|-------|-------|
| DBS | £′000 | £'000 |
| Fixed Interest funds | 2,500 | 2,350 |
| Equity funds | 3,218 | 3,833 |
| Absolute Return fund | 30 | 27 |
| Property funds | 503 | 480 |
| Private Equity funds | 320 | 300 |
| | 6,571 | 6,990 |



The Scheme is the sole investor in the Absolute Return fund. The assets underlying this PIV are:

| | 2021 | 2020 |
|-------------------|-------|-------|
| | £′000 | £′000 |
| Equities | 21 | 19 |
| Equities Bonds | 8 | 7 |
| Other | 1 | 1 |
| | 30 | 27 |

DCS

The DCS holdings of PIVs are analysed below:

| | 2021 | 2020 |
|-------------------------------|-------|-------|
| | £′000 | £′000 |
| ABC Scheme Equities | 606 | 525 |
| ABC Scheme Bonds | 125 | 105 |
| ABC Scheme Cash | 52 | 34 |
| ABC Scheme Diversified Growth | 32 | 31 |
| | 815 | 695 |

11. Derivatives

The Trustee has authorised the use of derivatives by their investment managers as part of their investment strategy for the Scheme as explained in the Trustee's Report. Summarised details of the derivatives held at the year end are set out below:

| Total derivatives | | | | | | |
|-------------------|-----------------|----------------------|------|----------------------|--|--|
| 2021 | | | 2020 | | | |
| | Assets £'000 | Liabilities £'000 | | Liabilities £'000 | | |
| Swaps | 252 | (10) | 250 | - | | |
| Futures | 88 | (13) | 80 | (8) | | |
| FX | 15 | (2) | 15 | (5) | | |
| | 355 | (25) | 345 | (13) | | |



i. Swaps

The Scheme had derivative contracts outstanding at the year end relating to its LDI fixed interest investment portfolio. These contracts are traded over the counter (OTC). The details are:

| Nature | Nominal amount | Duration | Asset value at year end | Liability value at year end |
|--|----------------|-----------------|----------------------------|--------------------------------|
| | £ | | £ | £ |
| Interest rate swap (Pay 5% for LIBOR) | 10,000,000 | Expires June 21 | 152,000 | - |
| Interest rate swap (Pay 3% for RPI) | 5,000,000 | Expires July 21 | 100,000 | - |
| Interest rate swap (Pay 5% for LIBOR) | 800,000 | Expires Aug 21 | - | (10,000) |
| Total 2021 | 15,800,000 | | 252,000 | (10,000) |
| Total 2020 | 13,600,000 | | 250,000 | - |

Under the OTC interest rate swaps, the counterparties had deposited £250,000 of cash collateral at the year end. This collateral is not reported within the Scheme's net assets.

ii. Futures

The Scheme had exchange traded overseas stock index futures outstanding at the year end relating to its return seeking overseas equity portfolio as follows:

| Nature | Notional Amount | Duration / | Asset value at year end | Liability value at year end |
|-------------------------------|-----------------|------------|-------------------------|--------------------------------|
| | £ | | £ | £ |
| Nikkei stock future bought | 368,000 | May 2021 | 88,000 | - |
| Nikkei stock future sold | (10,000) | June 2021 | - | (13,000) |
| Total 2021 | 358,000 | | 88,000 | (13,000) |
| Total 2020 | 225,000 | | 80,000 | (8,000) |

iii. Forward Foreign Exchange (FX)

The Scheme had open FX contracts at the year end relating to its currency hedging strategy as follows:

| Contract | Settlement date | Currency bought | Currency sold | Asset value at year end | Liability value at year end |
|-------------|-----------------|-----------------|---------------|----------------------------|--------------------------------|
| | | | | £ | £ |
| Forward OTC | One month | £50 | \$100 | 15,000 | - |
| Forward OTC | Three months | £100 | \$200 | - | (2,000) |
| Total 2021 | | | | 15,000 | (2,000) |
| Total 2020 | | | | 15,000 | (5,000) |



12. Longevity Swap

The counterparty to the longevity swap is Secure Asset Management Ltd. Collateral of £35 million was deposited in respect of this with Secure Asset Management. At 5 April 2021, the value of the collateral was £35.5 million which is reported within Bonds in the Scheme's Statement of Net Assets.

13. Insurance policies - annuities

The legacy annuity policies relate to benefits due for eight individuals. The Trustee no longer purchases annuities to meet Scheme liabilities. Annuities are issued by Sunshine Life Ltd and are valued by the Scheme Actuary. No collateral is held in relation to these assets.

14. Special Purpose Vehicle (SPV)

The Special Purpose Vehicle is the Scheme's interest in a Scottish Limited Partnership which owns a freehold property currently occupied by the Sponsoring Employer. Its fair value represents the present value of amounts due to the Scheme over a 25 year period. The Scheme's interest in the SPV is transferrable to another party only in very limited circumstances. Collateral, in the form of the freehold property currently in use by the Sponsoring Employer is available to the Trustee in the event the amounts due to the Scheme are not received. This collateral is valued at an amount representing 130% of the value of the SPV asset at 5 April 2021.

15. Additional Voluntary Contributions (AVCs)

DBS

The Trustee holds assets invested separately from the main DBS fund to secure additional benefits on a money purchase basis for those DBS members electing to pay AVCs. Members participating in this arrangement each receive an annual statement made up to 5 April confirming the amounts held in their account and the movements in the year. The aggregate amounts of AVC investments are as follows:

| | 2021 | 2020 |
|---------------------------------------|-------|-------|
| | £′000 | £′000 |
| Smith Investments Ltd – unitised fund | 153 | 136 |
| Jones & Jones plc – unitised fund | 163 | 124 |
| | 316 | 260 |

DCS

DCS AVCs are invested together with the main assets of that section as disclosed below:

| | 2021 | 2020 |
|-----------------------------|-------|-------|
| | £′000 | £′000 |
| Main DCS investments | 769 | 668 |
| Members' AVC investments | 38 | 21 |
| Trustee (unallocated units) | 8 | 6 |
| | 815 | 695 |



16. Investment reconciliation

Reconciliation of investments held at the beginning and the end of the year.

DBS

| Value at 6 April 2020 | Purchases at cost and derivative payments | Sales proceeds and derivative receipts | Change in market value | Value at 5 April 2021 |
|--------------------------|--|--|--|---|
| £′000 | £′000 | £′000 | £′000 | £′000 |
| 17,411 | 36 | (5) | 3,194 | 20,636 |
| 44,224 | 387 | (233) | 3,928 | 48,306 |
| 3,294 | - | - | 851 | 4,145 |
| 6,990 | 32 | (35) | (416) | 6,571 |
| 332 | 5 | (17) | 10 | 330 |
| 3 | - | - | - | 3 |
| 344 | - | - | 6 | 350 |
| 203 | - | - | (1) | 202 |
| 260 | 50 | (7) | 13 | 316 |
| 73,061 | 510 | (297) | 7,585 | 80,859 |
| 26 | | | | 27 |
| 7 | | | | 7 |
| 73,094 | | | | 80,893 |
| | 6 April 2020 £'000 17,411 44,224 3,294 6,990 332 3 344 203 260 73,061 26 7 | and derivative payments f'000 f'000 f'001 f'000 17,411 36 44,224 387 3,294 - 6,990 32 332 5 3 - 344 - 203 - 260 50 73,061 510 26 7 | and derivative payments and derivative receipts f'000 f'000 f'000 f'000 f'001 f'000 17,411 36 (5) 44,224 387 (233) 3,294 - - 6,990 32 (35) 332 5 (17) 3 - - 344 - - 203 - - 240 50 (17) 3 - - 7005 50 (17) 73,061 510 (297) 76 71 71 71 70 71 71 71 71 71 71 71 71 71 71 71 71 71 71 71 72 71 71 71 71 71 71 71 71 72 72 <t< td=""><td>Value at 6 April 2020 and derivative payments and derivative receipts Change in market value £'000 £'000 £'000 £'000 17,411 36 (5) 3,194 44,224 387 (233) 3,928 3,294 - 851 851 6,990 32 (35) (416) 332 5 (17) 10 3 - - - 344 - 6 - - 344 - - 6 - - 203 - - 11 - - - 73,061 510 (297) 7,585 -</td></t<> | Value at 6 April 2020 and derivative payments and derivative receipts Change in market value £'000 £'000 £'000 £'000 17,411 36 (5) 3,194 44,224 387 (233) 3,928 3,294 - 851 851 6,990 32 (35) (416) 332 5 (17) 10 3 - - - 344 - 6 - - 344 - - 6 - - 203 - - 11 - - - 73,061 510 (297) 7,585 - |

DCS

| | Value at 6 April 2020 | Purchases at cost and derivative payments | Sales proceeds and derivative receipts | Change in market value | Value at 5 April 2021 |
|----------------------------|--------------------------|--|---|---------------------------|--------------------------|
| | £′000 | £′000 | £′000 | £′000 | £′000 |
| Pooled investment vehicles | 695 | 187 | (165) | 98 | 815 |

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

17. Transaction costs

Included within the DBS purchases and sales are direct transaction costs of £50,000 (2020: £46,000) comprising fees, commissions and stamp duty. These costs are attributable to the key asset classes as follows:

| | | | | 2021 | 2020 |
|----------|-------|------------|------------|-------|-------|
| | Fees | Commission | Stamp Duty | Total | Total |
| | £′000 | £′000 | £′000 | £′000 | £′000 |
| Equities | 1 | 3 | 1 | 5 | 7 |
| Bonds | 25 | 5 | 10 | 40 | 35 |
| Other | 2 | 1 | 2 | 5 | 4 |
| 2021 | 28 | 9 | 13 | 50 | 46 |
| 2020 | 23 | 7 | 16 | - | 46 |



Transaction costs are also borne by the Scheme in relation to transactions in pooled investment vehicles. Such costs are taken into account in calculating the bid/offer spread of these investments and are not separately reported.

18. Repurchase and reverse repurchase agreements

At the year end, within other investment assets and liabilities, amounts payable under repurchase agreements amounted to £400,000 (2020: £307,000) and amounts receivable under reverse repurchase agreements amounted to £407,000 (2020: £314,000). At the year end £415,000 of bonds reported in Scheme assets are held by counterparties under repurchase agreements

19. Investment Fair Value Hierarchy

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

Level 1: the unadjusted quoted price in an active market for identical assets or liabilities which the entity can access at the measurement date;

Level 2: inputs other than quoted prices included within Level 1 which are observable (i.e. developed using market data) for the asset or liability, either directly or indirectly; and

Level 3: inputs which are unobservable (i.e. for which market data is unavailable) for the asset or liability.

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

The Scheme's investment assets and liabilities fall within the above hierarchy categories as follows:

| | Level (1) | Level (2) | Level (3) | Total |
|--------------------------------|-----------|-----------|-----------|--------|
| | £′000 | £'000 | £′000 | £′000 |
| At 5 April 2021 | | | | |
| DBS | | | | |
| Equities | 20,636 | - | - | 20,636 |
| Bonds | - | 48,306 | - | 48,306 |
| Property | - | 2,350 | 1,795 | 4,145 |
| Pooled investment vehicles | 1,718 | 4,533 | 320 | 6,571 |
| Derivatives | 75 | 255 | - | 330 |
| Longevity swap | - | - | 3 | 3 |
| Insurance policies – annuities | - | - | 350 | 350 |
| Special Purpose Vehicle | - | - | 202 | 202 |
| AVC investments | 153 | - | 163 | 316 |
| Cash | 27 | - | - | 27 |
| Other investment balances | 7 | - | - | 7 |
| | 22,616 | 55,444 | 2,833 | 80,893 |
| DCS | | | | |
| Pooled investment vehicles | 815 | - | - | 815 |
| | 23,431 | 55,444 | 2,833 | 81,708 |



| | Level (1) | Level (2) | Level (3) | Total |
|--------------------------------|-----------|-----------|-----------|--------|
| | £'000 | £'000 | £'000 | £′000 |
| At 5 April 2020 | | | | |
| DBS | | | | |
| Equities | 17,411 | - | - | 17,411 |
| Bonds | - | 44,224 | - | 44,224 |
| Property | - | 1,500 | 1,794 | 3,294 |
| Pooled investment vehicles | 1,850 | 4,691 | 449 | 6,990 |
| Derivatives | 72 | 260 | - | 332 |
| Longevity swap | - | - | 3 | 3 |
| Insurance policies – annuities | - | - | 344 | 344 |
| Special Purpose Vehicle | - | - | 203 | 203 |
| AVC investments | 136 | - | 124 | 260 |
| Cash | 26 | - | - | 26 |
| Other investment balances | 7 | - | - | 7 |
| | 19,502 | 50,675 | 2,917 | 73,094 |
| DCS | | | | |
| Pooled investment vehicles | 695 | - | - | 695 |
| | 20,197 | 50,675 | 2,917 | 73,789 |

20. Investment risks

Investment risks

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

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

Market risk: this comprises currency risk, interest rate risk and other price risk.

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

The Scheme has exposure to these risks because of the investments it makes to implement its investment strategy described in the Trustee's Report for the DBS and DCS. The Trustee manages investment risks, including credit risk and market risk, within agreed risk limits which are set taking into account the Scheme's strategic investment objectives. These investment objectives and risk limits are implemented through the investment management agreements in place with the Scheme's investment managers and monitored by the Trustee by regular reviews of the investment portfolios.



Further information on the Trustee's approach to risk management and the Scheme's exposures to credit and market risks are set out below. This does not include annuity insurance policies or AVC investments as these are not considered significant in relation to the overall investments of the Scheme.

DBS

i. Credit risk

The DBS is subject to credit risk as the Scheme invests in bonds, OTC derivatives, has cash balances and a Special Purpose Vehicle, undertakes stock lending activities and enters into repurchase agreements. The Scheme also invests in pooled investment vehicles and is therefore directly exposed to credit risk in relation to the instruments it holds in the pooled investment vehicles and is indirectly exposed to credit risks arising on the financial instruments held by the pooled investment vehicles.

Analysis of direct credit risk

| 2021 | | | | |
|-------------------------|---------------------------|-------------------------------|------------------|----------------|
| | Investment grade £′000 | Non-investment grade £'000 | Unrated £'000 | Total £′000 |
| Bonds | 30,500 | 17,806 | - | 48,306 |
| OTC Derivatives | 255 | - | - | 255 |
| Special Purpose Vehicle | - | - | 202 | 202 |
| Cash | 27 | - | - | 27 |
| Stock lending | 7,400 | - | - | 7,400 |
| Repos | 7 | - | - | 7 |
| PIVs | - | - | 6,571 | 6,571 |
| | 38,189 | 17,806 | 6,773 | 62,768 |

2020

| 2020 | | | | |
|-------------------------|------------------|----------------------|---------|--------|
| | Investment grade | Non-investment grade | Unrated | Total |
| | £′000 | £′000 | £′000 | £′000 |
| Bonds | 31,548 | 12,676 | - | 44,224 |
| OTC Derivatives | 260 | - | - | 260 |
| Special Purpose Vehicle | - | - | 203 | 203 |
| Cash | 26 | - | - | 26 |
| Stock lending | 5,620 | - | - | 5,620 |
| Repos | 7 | - | - | 7 |
| PIVs | - | - | 6,990 | 6,990 |
| | 37,461 | 12,676 | 7,193 | 57,330 |

Credit risk arising on bonds is mitigated by investing in government bonds where the credit risk is minimal, or corporate bonds which are rated at least investment grade. The Scheme also invests in high yield and emerging market bonds which are non-investment grade. The Trustee manages the associated credit risk by requesting the investment manager to diversify the portfolio to minimise the impact of default by any one issuer. Credit risk arising on other investments is mitigated by investment manadets requiring counterparties to have at least investment grade credit quality. This is the position at the year end.



Credit risk arising on derivatives depends on whether the derivative is exchange traded or over the counter (OTC). OTC derivative contracts are not guaranteed by any regulated exchange and therefore the Scheme is subject to risk of failure of the counterparty. The credit risk for OTC swaps is reduced by collateral arrangements (see note 11 (i)). Credit risk also arises on forward foreign currency contracts. There are no collateral arrangements for these contracts but all counterparties are required to be at least investment grade.

Collateral arrangements around the Special Purpose Vehicle are disclosed in note 14. Cash is held within financial institutions which are at least investment grade credit rated.

The Scheme lends certain fixed interest and equity securities under a Trustee-approved stock lending programme. The Trustee manages the credit risk arising from stock lending activities by restricting the amount of overall stock that may be lent, only lending to approved borrowers who are rated investment grade, limiting the amount that can be lent to any one borrower and putting in place collateral arrangements. At the year end, the Scheme had lent £5.4 million (2020: £3.5 million) of UK public sector securities and £2 million (2020: £2.1 million) of UK quoted securities and held collateral in the form of cash and fixed interest securities with a value of 105% of stock lent.

Credit risk on repurchase agreements is mitigated through collateral arrangements. Included in 'Other Investment Balances' are amounts of £407,000 (2020: £314,000) due from counterparties in relation to reverse repo transactions. £410,000 (2020: £305,000) has been received from counterparties as collateral.

The Scheme's holdings in pooled investment vehicles are unrated. Direct credit risk arising from pooled investment vehicles is mitigated by the underlying assets of the pooled arrangements being ring-fenced from the pooled manager, the regulatory environments in which the pooled managers operate and diversification of investments amongst a number of pooled arrangements. The Trustee carries out due diligence checks on the appointment of new pooled investment managers and on an ongoing basis monitors any changes to the regulatory and operating environment of the pooled managers.

| | £′000 | £'000 |
|--|-------|-------|
| Unit linked insurance contracts | 800 | 750 |
| Authorised unit trusts | 5,150 | 5,165 |
| Open ended investment companies | 363 | 426 |
| Shares of limited liability partnerships | 258 | 649 |
| | 6,571 | 6,990 |

A summary of pooled investment vehicles by type of arrangement is as follows:

Indirect credit risk arises in relation to underlying investments held in the bond pooled investment vehicles. This risk is mitigated by only investing in pooled funds which invest in at least investment grade credit rated securities.

ii. Currency risk

The Scheme is subject to currency risk because some of the Scheme's investments are held in overseas markets, either as segregated investments or via pooled investment vehicles. The Trustee limits overseas currency exposure through a currency hedging policy.

The Scheme's total net unhedged exposure by major currency at the year end was as follows:



| | 2021 | 2020 |
|--------------|-------|-------|
| | £′000 | £′000 |
| Currency | | |
| US Dollar | 7,633 | 6,036 |
| Japanese Yen | 4,258 | 4,653 |
| Other | 243 | 275 |

iii. Interest rate risk

The Scheme is subject to interest rate risk on the LDI investments comprising bonds and interest rate swaps held either as segregated investments or through pooled vehicles and cash. At the year end the LDI portfolio comprised:

| | 2021 | 2020 | |
|-------------------|--------|--------|--|
| | £′000 | £′000 | |
| Direct | | | |
| Bonds | 48,306 | 44,224 | |
| Swaps Indirect | 242 | 250 | |
| Indirect | | | |
| Other | 2,500 | 2,350 | |

iv. Other price risk

Other price risk arises principally in relation to the Scheme's return seeking portfolio which includes directly held equities, equities held in pooled vehicles, equity futures, hedge funds, private equity and investment properties.

The Scheme manages this exposure to other price risk by constructing a diverse portfolio of investments across various markets.

At the year end, the Scheme's exposure to investments subject to other price risk was:

| | 2021 | 2020 |
|-----------------------|--------|--------|
| | £′000 | £'000 |
| Direct | | |
| Equities | 20,636 | 17,411 |
| Equity futures | 75 | 72 |
| Investment properties | 4,145 | 3,294 |
| Indirect | | |
| Equity PIVs | 3,218 | 3,833 |
| Hedge funds | 30 | 27 |
| PE funds | 320 | 300 |

v. Concentration of investment

Scheme investments include the following which represent more than 5% of the total value of the net assets of the Scheme:



| | 2021 | 2020 |
|---|-------|-------|
| | £'000 | £'000 |
| PIV: Equity funds | 3,218 | 3,833 |
| Representing (percentage of total net assets) | 4% | 5.2% |

DCS

i. Direct credit risk

The DCS is subject to direct credit risk in relation to TAM Ltd through its holding in unit linked insurance funds provided by TAM Ltd.

TAM Ltd is regulated by the Financial Conduct Authority and maintains separate funds for its policy holders. The Trustee monitors the creditworthiness of TAM Ltd by reviewing published credit ratings. TAM Ltd invests all the Scheme's funds in its own investment unit linked funds and it does not use any other investment funds or reinsurance arrangements. In the event of default by TAM Ltd, the Scheme is protected by the Financial Services Compensation Scheme.

ii. Indirect credit and market risks

The DCS is also subject to indirect credit and market risk arising from the underlying investments held in the TAM funds. The funds which have significant exposure to these risks are set out below:

| 2021 and 2020 | | | | |
|-------------------------------|--------------|--------------------------|--------------------|------------------|
| | Credit risk | Foreign exchange risk | Interest rate risk | Other price risk |
| ABC Scheme Equities | - | \checkmark | - | \checkmark |
| ABC Scheme Bonds | \checkmark | \checkmark | \checkmark | - |
| ABC Scheme Cash | \checkmark | - | \checkmark | - |
| ABC Scheme Diversified Growth | \checkmark | \checkmark | \checkmark | \checkmark |

The analysis of these risks set out above is at Scheme level. Member level risk exposures will depend on the funds invested in by members.

The Trustee has selected the above funds and have considered the indirect risks in the context of the investment strategy described in the Trustee's Report.

21. Related party transactions

Contributions received in respect of Trustee Directors who are members of the Scheme have been made in accordance with the Trust Deed and Rules.

All Trustee Directors receive an annual fee for services as Trustee Directors of £1,000 (2020: £750).

The Scheme is administered by ABC Group Administration Ltd, an ABC Group company. Fees payable in respect of administration and processing of £21,000 (2020: £21,000) are included within administrative expenses. At the year end creditors include £7,000 (2020: £ nil) in respect of administration expenses payable to ABC Group Administration Ltd.

22. Self-investment

The Scheme holds an investment of 10,987 ABC Group plc ordinary shares at the year end, the value of which represents 1.5% of the Scheme's net assets. The maximum holding of the Scheme in ABC Group plc ordinary shares during the year was 20,000 shares which represented 1.7% of the Scheme's net assets. These shares were all disposed of in May 2021.



KPMG LLP 1 Church Street Newtown Shire, AB1 3CD

Independent Auditor's Statement about Contributions to the Trustee of the ABC Group Pension Scheme

Statement about contributions

We have examined the Summary of Contributions payable under the Schedule of Contributions to the ABC Group Pension Scheme in respect of the Scheme year ended 5 April 2021 which is set out on page 41.

In our opinion contributions for the Scheme year ended 5 April 2021 as reported in the Summary of Contributions and payable under the Schedule of Contributions have in all material respects been paid at least in accordance with the Schedule of Contributions certified by the Actuary on 10 January 2020.

Scope of work

Our examination involves obtaining evidence sufficient to give reasonable assurance that contributions reported in the Summary of Contributions have in all material respects been paid at least in accordance with the Schedule of Contributions. This includes an examination, on a test basis, of evidence relevant to the amounts of contributions payable to the Scheme and the timing of those payments under the Schedule of Contributions.

Respective responsibilities of the trustee and auditor

As explained more fully in the Statement of Trustee's Responsibilities set out on page 41 the Scheme's Trustee is responsible for ensuring that there is prepared, maintained and from time to time revised a Schedule of Contributions showing the rates and due dates of certain contributions payable towards the Scheme by or on behalf of the employer and the active members of the Scheme. The Trustee is also responsible for keeping records in respect of contributions received in respect of active members of the Scheme and for monitoring whether contributions are made to the Scheme by the employer in accordance with the Schedule of Contributions.

It is our responsibility to provide a Statement about Contributions paid under the Schedule of Contributions to the Scheme and to report our opinion to you.

The purpose of our work and to whom we owe our responsibilities

This statement is made solely to the Scheme's Trustee in accordance with the Pensions Act 1995 and Regulations made thereunder. Our work has been undertaken so that we might state to the Scheme's Trustee those matters we are required to state to it in an auditor's statement about contributions and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Scheme's Trustee for our work, for this statement, or for the opinions we have formed.

9 Smith

John Smith

for and on behalf of KPMG LLP, Statutory Auditor

Chartered Accountants 1 New Street, Newtown

17 September 2021



Statement of Trustee's Responsibilities in respect of Contributions

The Scheme's Trustee is responsible under pensions legislation for ensuring that there is prepared, maintained and from time to time revised a Schedule of Contributions showing the rates of contributions payable towards the Scheme by or on behalf of the employer and the active members of the Scheme and the dates on or before which such contributions are to be paid. The Scheme's Trustee is also responsible for keeping records of contributions received in respect of any active member of the Scheme and for procuring that contributions are made to the Scheme in accordance with the schedule.

Trustee's Summary of Contributions payable under the Schedule in respect of the Scheme year ended 5 April 2021

This Summary of Contributions has been prepared by, and is the responsibility of, the Trustee. It sets out the employer and member contributions payable to the Scheme under the Schedule of Contributions certified by the actuary on 10 January 2020 in respect of the Scheme year ended 5 April 2021. The Scheme Auditor reports on contributions payable under the Schedule in the Auditor's Statement about Contributions.

| Contributions payable under the Schedule in respect of the Scheme year | £′000 |
|---|-------|
| Employer | |
| Normal contributions | 352 |
| Augmentation contributions | 5 |
| Deficit funding contributions | 20 |
| Other contributions | 26 |
| Member | |
| Normal contributions | 352 |
| Contributions payable under the Schedule (as reported on by the Scheme Auditor) | 755 |

Reconciliation of Contributions Payable under the Schedule of Contributions to Total Contributions reported in the Financial Statements

| | £′000 |
|--|-------|
| Contributions payable under the Schedule (as above) | 755 |
| Contributions payable in addition to those due under the Schedule (and not reported on by the Scheme Auditor): | |
| s75 contribution | 15 |
| Member additional voluntary contributions | 70 |
| Total contributions reported in the Financial Statements | 840 |

Signed on behalf of the Trustee of the ABC Group Pension Scheme on 16 September 2021

A Rook 8 Dane



Actuary's Certification of Schedule of Contributions

Name of scheme: ABC Group Pension Scheme

Adequacy of rates of contributions

1. I certify that, in my opinion, the rates of contributions shown in this Schedule of Contributions are such that the statutory funding objective can be expected to continue to be met for the period for which the Schedule is to be in force.

Adherence to Statement of Funding Principles

2. I hereby certify that, in my opinion, this Schedule of Contributions is consistent with the Statement of Funding Principles dated 5 November 2019.

The certification of the adequacy of the rates of contributions for the purpose of securing that the statutory funding objective can be expected to be met is not a certification of their adequacy for the purpose of securing the Scheme's liabilities by the purchase of annuities, if the Scheme were to be wound up.

9 K Dunn

J K Dunn

10 January 2020



Report on Actuarial Liabilities (forming part of the Trustee's Report)

Under Section 222 of the Pensions Act 2004, every scheme is subject to the Statutory Funding Objective, which is to have sufficient and appropriate assets to cover its technical provisions. The technical provisions represent the present value of the benefits members are entitled to based on pensionable service to the valuation date. This is assessed using the assumptions agreed between the Trustee and the Employer and set out in the Statement of Funding Principles, which is available to Scheme members on request.

The most recent full actuarial valuation of the Scheme was carried out as at 5 April 2019. This showed that on that date:

The value of the Technical Provisions was: £70 million. The value of the assets at that date was: £65 million.

The method and significant actuarial assumptions used to determine the technical provisions are as follows (all assumptions adopted are set out in the Appendix to the Statement of Funding Principles).

Method

The actuarial method to be used in the calculation of the technical provisions is the Projected Unit Method.

Significant actuarial assumptions

Discount interest rate: term dependent rates set by reference to the fixed interest gilt curve (as derived from Bank of England data) at the valuation date plus an addition of 0.5% per annum.

Future Retail Price inflation: term dependent rates derived from the Bank of England fixed interest and index-linked gilt curves at the valuation date.

Future Consumer Price inflation: term dependent rates derived from the assumption for future retail price inflation less an adjustment equal to 0.9% per annum.

Pension increases: derived from the term dependent rates for future consumer price inflation allowing for the caps and floors on pension increases according to the provisions in the Scheme's rules.

Pay increases: general pay increases of 1.5% per annum above the term dependent rates for the future retail price inflation (NB not a significant assumption if few active members).

Mortality: for the period in retirement, standard tables S1PMA with a scaling factor of 98% for male active members, 103% for male deferred members and 99% for male pensioner members and S1PFA with a scaling factor of 103% for female active members, 107% for female deferred members and 111% for female pensioner members.





Section 3: Pension scheme annual report disclosure checklist

Pension scheme annual report checklist

This checklist is intended to cover the annual report disclosures of occupational pension schemes as required under the Pensions Act 1995 and FRS102, and as recommended by the Statement of Recommended Practice, 'Financial Reports of Pension Schemes' (revised June 2018).

Contents

Section A Trustees' report

Section B Accounts

Section C Report on Actuarial Liabilities

Section D Actuarial certificate and statement

This checklist does not seek to comment on or interpret the Pensions Acts 1995 and 2004 ('the Acts'), the regulations issued under the Acts, FRS 102 or the recommendations of the SORP. It frequently paraphrases the source documents and hence, although it seeks to be comprehensive, reference must be made to the source documents on any point of doubt or difficulty, and also to put the requirements in their proper context. Compliance with the disclosure requirements will not necessarily ensure that the financial statements give the 'true and fair view' required by the Act and the circumstances of each case, including any relevant requirements of a pension scheme's rules or trust deed, will need to be considered. The overriding requirement in all instances is that the financial statements show a 'true and fair view'.

In most instances items may be omitted where they are not material. In this respect the original text should be consulted.

Unless otherwise indicated, the references to the SORP, FRSs and the relevant regulations are given in the left hand margin of the checklist. References to the Occupational Pension Schemes (Disclosure of Information) Regulations SI 2013 No 2734 ('the Disclosure Regulations') are to Schedule 3 to those regulations and are denoted as the schedule number followed by the paragraph number. Thus 3,2 refers to paragraph 2 of Schedule 3 to the Disclosure Regulations. Where reference is made to the Regulations themselves, this is indicated by an asterisk and footnote.

References to other legislation are given in footnotes.



A Trustee's report

The Trustees' report should include the following, summarised where appropriate:

| Reference | e | | | | | |
|-----------|---------|-------------|--|-----|-----|----|
| SORP | SI | | | Yes | n/a | No |
| | | A1 1 | Trustees | | | |
| | 3,17 | (i) | The names of the Trustees of the scheme, or, where the sole Trustee is a company, the names of the directors of that company, during the scheme year; | | | |
| | 3,18 | (ii) | The provisions of the scheme for appointing and removing Trustees from office; or, where the sole Trustee is a company, the provisions in the articles of association of that company which relate to the appointment and removal from office of directors; | | | |
| | 3,20 | (ii i) | Postal and electronic addresses for enquiries about the scheme. | | | |
| | | A2 I | ndependent advisers | | | |
| | 3,19 | (i) | The names of the scheme's professional advisers, including the bank, custodian and others who have acted for, or were retained by the Trustees during the year. | | | |
| | 3,19 | (ii) | Details of any changes to the advisers since the previous year. | | | |
| | 3,31 | (iiii) | A copy of any statement made on the resignation or removal of the auditor or actuary and made in accordance with regulations made under section 47(6) of the 1995 Act (professional advisers). | | | |
| | | A3 I | Membership statistics | | | |
| | 3,21 | | total number of members, split into actives, deferreds and | | | |
| | | pens | sioners (including dependants) at any one date during the year ally the year end). | | | |
| | | A4 (| Changes in pensions and benefits | | | |
| | | | The requirements set out in A4 do not apply in the case of money purchase schemes. | | | |
| | 3,22 | | ails of percentage increases during the year (other than utory ones) to: | | | |
| | | (a) | Pensions in payment; | | | |
| | | (b) | Deferred pensions; | | | |
| | | | Stating whether the increases are discretionary, and if so, to what extent. | | | |
| | | | Where there have been different increases for different individuals/groups the maximum, minimum and average percentage increases should be disclosed. | | | |
| | | A5 1 | Transfer values paid/received | | | |
| | | | The requirements set out in A5 do not apply to wholly insured money purchase schemes. These are defined as schemes under which all the benefits provided are secured by a policy of insurance or annuity contract. | | | |
| | 3,23(a) | (i) | Where any cash equivalents (i.e. transfer values) paid in the year were not calculated and verified in accordance with regulations under the Pension Schemes Act 1993, a statement explaining why. | | | |
| | 3,23(b) | (ii) | Where any transfers were made at less than their cash equivalent value, the reasons why they were less. | | | |



| Reference | | | | | | |
|-----------|---------|-------------|--|-----|-----|----|
| SORP | SI | | | Yes | n/a | No |
| | 3,23(c) | (iii) | A statement of when full values became, or are estimated to become, available. | | | |
| | 3,23(d) | (i∨) | Whether any discretionary benefits are included in the calculation of transfer values, and if so, the method by which the value of discretionary benefits is assessed. | | | |
| | | A6 I | Basis of preparation | | | |
| | 3,24 | prep | atement whether the financial statements have been bared and audited in accordance with Section 41(1) and (6) of Pensions Act 1995. | | | |
| | | A7 (| Contributions | | | |
| | 3,25 | (i) | If the auditors' statement about contributions is negative or has been qualified, the Trustees' report should refer to this and state where the Trustees' explanation of the circumstances and resolution can be found. | | | |
| | 3,26 | (ii) | If such a situation as described in (i) in respect of a previous scheme year was not resolved in a previous year, a statement as to how it has been or is likely to be resolved. | | | |
| | | A8 I | nvestment management | | | |
| | | 0.51 | | | | |
| | | <u>GEN</u> | IERAL PROVISIONS FOR ALL SCHEMES (OTHER THAN_ AS STATED): | | | |
| | | NB: | The requirement set out in A8 (iii) does not apply to wholly insured schemes. | | | |
| | 3,27 | (i) | Names of the fund managers during the year and details of any delegation by the Trustees of their investment management functions; | | | |
| | 3,28 | (ii) | Whether, if appropriate, the Trustees have produced a Statement of Investment Principles (SIP) in accordance with section 35 of the Act and, if so, that a copy is available on request; | | | |
| | 3,29 | (iii) | A statement of the Trustees' policy on the custody of the scheme's assets; | | | |
| | 3,30(a) | (iv) | Details of any investments which were not made in accordance with the Statement of Investment Principles; | | | |
| | 3,30(b) | (v) | In respect of any such investments made in the year (or made in previous years and still held during the current year), the reasons why they were made and the action that has been, or is to be, taken (if any) to remedy the position; | | | |
| | 3,30(c) | (vi) | A review of the investment performance of the scheme's fund: | | | |
| | | | (a) During the year being reported on; | | | |
| | | | (b) During the past three to five years (including the year being reported on) including an assessment of the nature, disposition, marketability, security and valuation of the scheme's assets. | | | |
| | 3,30(d) | (∨ii) | Their policies in relation to financially material considerations over the appropriate time horizon of the investments, including how those considerations are taken into account in the selection, retention and realisation of investments, and | | | |



| Reference | e | | | | | |
|-----------|---------|--------|---|-----|-----|----|
| ORP | SI | | | Yes | n/a | No |
| | 3,30(d) | (∨iii) | the extent (if at all) to which non-financial matters are taken into account in the selection, retention and realisation of investments | | | |
| | 3,30(d) | (ix) | their policy in relation to: | | | |
| | | | (a) the exercise of the rights (including voting rights) attaching to the investments; and | | | |
| | | | (b) undertaking engagement activities in respect of the investments (including the methods by which, and the circumstances under which, trustees would monitor and engage with relevant persons about relevant matters) "relevant persons" includes (but is not limited to) an issuer of debt or equity, an investment manager, another stakeholder or another holder of debt or equity. | | | |
| | | | "relevant matters" includes (but is not limited to) matters concerning an issuer of debt or equity, including their performance, strategy, capital structure, management of actual or potential conflicts of interest, risks, social and environmental impact and corporate governance. | | | |
| | 3,30(d) | (x) | (BY 1/10/20) their policy in relation to the trustees' arrangement with any asset manager, setting out the following matters or explaining the reasons why any of the following matters are not set out— | | | |
| | | | (a) how the arrangement with the asset manager incentivises the asset manager to align its investment strategy and decisions with the trustees' policies; | | | |
| | | | (b) 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; | | | |
| | | | (c) 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; | | | |
| | | | (d) 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 | | | |
| | | | (e) the duration of the arrangement with the asset manager Note: Information required to be disclosed in paragraphs (vii) to (ix) above should be included in scheme SIPs from 1/10/19 (other than (x) which is required to be included in the SIP by 1/10/20) and reported against in implementation statements from 1/10/20. | | | |
| | | | Implementation Statements | | | |
| | | | Note: Implementation Statements are introduced for annual reports finalised after 1 October 2020 so will impact on schemes at varying dates depending on their year end and the date accounts are finalised. | | | |
| | | | DB SCHEMES | | | |
| | | | A statement which must – | | | |



| Referenc | e | | | | | | | |
|----------|-----------|--|--|-----|-----|----|--|--|
| SORP | SI | | | Yes | n/a | No | | |
| | 3,30 (ca) | (i) | set out how, and the extent to which, in the opinion of the trustees, the policy required under regulation 2(3)(c) of the Occupational Pension Schemes (Investment) Regulations 2005 [the policy described at paragraph (Ix) above] has been followed during the year, and | | | | | |
| | | (ii) | describe the voting behaviour by, or on behalf of, trustees (including the most significant votes cast by trustees or on their behalf) during the year and state any use of the services of a proxy voter during that year, | | | | | |
| | | | DC AND HYBRID SCHEMES | | | | | |
| | 3,30(f) | (×i) | where the scheme is a relevant scheme within the meaning of the Occupational Pension Schemes (Scheme Administration) Regulations 1996 [basically, providing DC benefits], a statement which must— | | | | | |
| | | | set out how, and the extent to which, in the opinion of the trustees, the statement of investment principles required under section 35 of the 1995 Act has been followed during the year, | | | | | |
| | | | describe any review of the statement of investment principles undertaken during the year in accordance with regulation 2(1) of the Investment Regulations and any other review of how the statement of investment principles has been met, | | | | | |
| | | | (iii) explain any change made to the statement of investment principles during the year and the reason for the change, and | | | | | |
| | | | (iv) where no such review was undertaken during the year in accordance with regulation 2(1) of the Investment Regulations, give the date of the last review. | | | | | |
| | | | (v) describe the voting behaviour by, or on behalf of, trustees (including the most significant votes cast by trustees or on their behalf) during the year and state any use of the services of a proxy voter during that year. | | | | | |
| | | A9 | Employer-related investment | | | | | |
| 3.33.3 | | Where a scheme has employer-related investments (as defined by s40(2) of the Pensions Act 1995), disclose: | | | | | | |
| | 3,32(a) | (i) | The percentage of the scheme's net assets that are invested in employer-related investments at the year end; Under Regulation 12 of the Occupational Pension Schemes (Investment) Regulations 2005 SI No 3378 no more than 5% of the current market value of the total resources of a scheme may at any time be invested in employer-related investments and none of the resources of a scheme may at any time be invested in any employer-related loan. However, certain investments, which are employer-related investments by virtue of s40(2) of the Pensions Act 1995 can be disregarded for the purposes of Regulation 12. | | | | | |
| | 3,32(b) | (ii) | If that percentage exceeds 5%, the percentage of the scheme's net assets which are investments to which the 5% restriction does not apply; | | | | | |



| Referenc | e | | | | | |
|----------|-----------------|--------|---|-----|-----|----|
| SORP | SI | | | Yes | n/a | No |
| | 3,32(c) 3.33 | (iii) | If, having taken account of any exempt investments, the percentage still exceeds 5% or are otherwise in breach of the restrictions, the steps that the Trustees have taken or propose to take to achieve compliance with the Investment Regulations, and the timetable for such steps to be taken; NB: The 5% restriction on self-investment does not apply to 'small schemes' as defined in Regulation 1 of the Investment Regulations (these are essentially former SSASs) or to schemes with less than 100 members. See the Regulations for details. Where the scheme is a trust scheme which applies to | | | |
| | | | earners in employments under different employers, a statement in accordance with paragraph 32 of the Disclosure Regulations or a statement: | | | |
| | | (i) | Listing the 100 largest investments by value held by the scheme as at the year end and stating what percentage of the scheme each investment represents; | | | |
| | | (ii) | Identifying which of these are employer-related investments; and | | | |
| | | (iii) | If, at the end of the year, more than 5% of the scheme is invested in employer-related investments; | | | |
| | | | (a) Listing the employer-related investments and the name of the employer concerned; | | | |
| | | | (b) The steps the scheme has taken or proposes to take to ensure that the percentage is reduced to 5% or less; | | | |
| | | | (c) The time when any proposed steps will be taken. Note that the 2013 Disclosure Regulations state that the definition of employer-related investment for para 33 has the same meaning as under s40 of the PA1995 with the omission of the words 'or any person who is connected with or an associate of the employer' and 'or any such person'. | | | |
| | | A10 S | tatement of Trustees' responsibilities | | | |
| 2.6.1 | | Revise | ed Practice Note 15 includes an illustrative statement of trustees' | | | |
| | | | nsibilities about their key responsibilities in relation to the ration of financial statements, including going concern consideration | S. | | |



| Reference | | | | | | | | |
|-----------|-------------------|---------------|------------------------|--------------------------------|---|-----|-----|----|
| SORP | SI | | | | | Yes | n/a | No |
| | | A11 | Relev | ant d | efined contribution schemes: Annual chair statement | | | |
| | Reg 23* | Gove sche | ernano emes j | ce Reg | ion Regulations (as amended by the Charges and gulations 2015 [*]) require that trustees of relevant e an annual chair's statement within seven months of r end.; | | | |
| | | Scher Occu | mes (C pationa | charges a al Pensic | inistration Regulations as amended by the Occupational Pension and Governance) Regulations 2015 SI 2015 No. 879 and the on Schemes (Administration and Disclosure) (Amendment) 2018 No. 233. | | | |
| | Reg 1(2)* | | | | es are defined in the Regulations [*] as occupational as which provide money purchase benefits other than: | | | |
| | | (a) | sche the s direc | ome rel sole tru tors of | ve pension scheme (where an executive scheme is a ation to which a company is the only employer and ustee and the members are either current or former the company and include at least one third of the actors); | | | |
| | | (b) | | | small scheme (where a relevant small scheme means a th fewer than 12 members, where | | | |
| | | | (a) | all me | mbers are trustees and either: | | | |
| | | | | a | ny decision made by the trustees is by unanimous agreement of the trustees who are members of the scheme; or | | | |
| | | | | | he scheme has an independent trustee and is registered vith TPR; or | | | |
| | | | | all me and ei | mbers are directors of a company which is sole trustee ther: | | | |
| | | | | а | s any decision made by the trustee is by unanimous greement of the directors who are members of the cheme; or | | | |
| | | | | | he scheme has an independent director registered vith TPR.) | | | |
| | | (c) | | | which does not fall within paragraph 1 of Schedule 1 3 Disclosure Regulations (Description of schemes); | | | |
| | | (d) | Regu publi | ulation | ervice pension scheme which either falls within 4(2) of the 2013 Disclosure Regulations or is a ice scheme within the meaning of the 2004 act; or | | | |
| | | (e) | othe | r than | which provides no money purchase benefits benefits which are attributable to additional ontributions. | | | |
| | | The | annua | al chair | 's statement must contain the following: | | | |
| | Reg | | | | | | | |
| | 23(1)(a)* | (a) | (i) | the lat | o the default arrangement: est statement of principles prepared in accordance with vestment Regulations 2005; | | | |
| | | | (ii) | details | of any review undertaken during the scheme year; | | | |
| | | | (iii) | an exp | planation of any changes resulting from such a review; and | | | |
| | | | | | e no review was undertaken during the year, the of the last review. | | | |
| | P | 4.5 | | | | | | |
| | Reg 23((1)(b)* | (b) | | | on of how the trustees have ensured that core financial is have been processed promptly and accurately. | | | |



| Reference | ; | | | | | | |
|-----------|--------------------------------------|-----|-----------------------------|---|-----|-----|----|
| SORP | SI | | | | Yes | n/a | No |
| | Reg 25(1)(a) [*] | (C) | | elation to the charges and transaction costs which the trustees required to calculate under the Regulations [*] : | | | |
| | Reg 23(1)(c)* | | (i) | state the level of charges and transaction costs applicable to each default arrangement during the scheme year; | | | |
| | Reg 23(1)(c)* | | (ii) | state the levels of charges and transaction costs applicable to each fund which members are able to select and in which assets relating to members are invested during the scheme year; | | | |
| | Reg 23(1)(c)* | | (iii) | indicate any information about transaction costs which the trustees have been unable to obtain and explain what steps are being taken to obtain that information in the future; | | | |
| | Reg 23(1)(c)* Reg 25(1)(b)* | | (iv) | explain the trustees' assessment of the extent to which the charges and transaction costs represent good value for members. | | | |
| | Reg 23(1) (ca)* | | mar 25(1 cum cost | elation to the charges and transaction costs which trustees or hagers are required to calculate in accordance with Regulation)(a) of these Regulations, an illustrative example of the hulative effect over time of the application of those charges and ts on the value of a member's accrued rights to money chase benefits. | | | |
| | Reg 23 (1)(d)* | (d) | the unde expl with | escription of how the requirements of sections 247 and 248 of Pensions Act 2004 (requirements for knowledge and erstanding) have been met during the scheme year and an anation how the combined knowledge of the trustees, together the advice which is available to them, enables them properly xercise their functions as trustees of the scheme. | | | |
| | Reg 23(1)(e) [*] | (e) | | statement must be signed on behalf of the trustees by chair. | | | |
| | Reg 26* | (f) | | multi-employer schemes only, the statement must include tional information. | | | |
| | | | (i) | The statement must describe how the requirement for the majority of trustees and chair to be non-affiliated have been met. | | | |
| | | | (ii) | Where a trustee who is non-affiliated was appointed during the year, the statement must provide details of how the requirement (open and transparent process) was met. | | | |
| | | | (iii) | Details of the arrangements in place to meet the requirements | | | |
| | Reg 23 (1A)* | NB: | | to represent the views of the members to the trustees. mplying with the requirements imposed by graph (1)(c)(i), (ii) and (ca), the trustees or managers | | | |
| | | | mus | t have regard to guidance prepared from time to time by Secretary of State. | | | |



B Accounts

| Referenc | | | | | | |
|------------------|-------------------|--|--|-----|-----|----|
| SORP | FRS102 | | | Yes | n/a | No |
| | | B1 The finan | cial statements should comprise: | _ | | _ |
| 3.5.1 | 34.35(a) | (I) Fund Ac | count; | | | |
| 3.5.1 | 34.35(b) | (II) Stateme | ent of Net Assets (available for benefits); | | | |
| 3.5.1 | 34.35(c) | (III) Notes to | o the financial statements; | | | |
| | | B2 Format of | financial statements: | | | |
| | | (I) Fund Ac | count | | | |
| 3.7.1 | 34.35(a) 34.37 | Account, whe be shown on may be disclo (A) Dealings v | ts the minimum of items to be included in the Fund are they are material. The account headings in blue should the face of the primary statements. The non-blue items used in the notes to the financial statements. with members, participating employers and others nvolved in the scheme. | | | |
| | 34.37 | (a)(i) Em | ployer contributions | | | |
| 3.7.2 | | (a) | Normal; | | | |
| 3.7.2 | | (b) | Augmentation; | | | |
| 3.7.2/ | | (c) | Deficit Funding; | | | |
| 3.8.8 | | | The notes to the financial statements should explain for how long deficit funding contributions are payable. For multi-employer schemes this information can be provided on an aggregated basis at scheme level. The SORP recommends that the nature of arrangements based on the payment of deficit funding contributions which are receivable by the scheme when certain triggers are met, including a reference to those triggers and the amounts involved, should be disclosed in the notes to the financial statements. | | | |
| 3.7.2/ 3.8.12 | | (d) | s75 debts; Where a s75 debt has not yet been determined by the actuary, this should be disclosed in the notes to the financial statements and an estimate of the debt should be included. As there is no statutory timescale within which a s75 debt must be determined, where a reasonable estimate cannot be made, for example because the s75 debt has not been determined by the actuary, the SORP recommends this is disclosed in the notes to the financial statements and a statement that the debt cannot be estimated with the reasons why. | | | |
| 3.7.2 | | (e) | Other. | | | |
| 3.7.2 | 34.37 | (a)(ii) Em | ployee contributions: | | | |
| 3.7.2 | | (a) | Normal; | | | |
| 3.7.2 | | (b) | Additional voluntary contributions. | | | |
| 3.7.2 | 34.37 | (b) Tra | nsfers in: | | | |
| | | (a) | Group transfers in from other schemes and scheme mergers; | | | |



| Referenc | e | | | | | |
|-------------------|--------|-----|---|-----|-----|----|
| SORP | FRS102 | | | Yes | n/a | No |
| 3.8.29 | | | (b) Individual transfers in from other schemes. Disclosure should be made of the method by which group transfers have been effected, where these have been other than by a cash receipt (e.g. transfer of securities). | | | |
| 3.7.2 | 34.37 | (C) | Other income | | | |
| | | | (i) Claims on term assurance policies; | | | |
| | | | (ii) Any other category of income, which does not naturally fall into the above classifications, suitably described and analysed where material. | | | |
| 3.7.2 | 34.37 | (d) | Benefits paid or payable | | | |
| | | | (i) Pensions; | | | |
| | | | Commutation of pensions and lump sum retirement benefits; | | | |
| | | | (iii) Purchase of annuities: Where income is received from annuities held in the name of the Trustees in order to fund pensions paid by the scheme, the income arising from the annuity policies should be included in investment income or sale proceeds and the pensions paid to the pensioners included in pension payments. | | | |
| | | | There should be no netting off of these amounts. (iv) Lump sum death benefits; | | | |
| 3.8.24 | | | (v) Taxation: Where a member's benefit entitlement exceeds the United Kingdom Inland Revenue tax limits (Lifetime Allowance or the Annual Allowance), the member is liable for taxation. This tax can be settled by the member or the Trustees may agree to settle the tax on behalf of the member in exchange for a reduction in benefit entitlement. In this scenario the SORP recommends that the payment of tax on behalf of the member is reported separately in the notes to the financial statements. | | | |
| 3.8.22, 3.8.23 | | | From April 2015, members may use their pot to purchase an annuity, take a lump sum equal to the pot value or take income draw down benefits from the scheme (less tax at their marginal rate). Members may transfer their pot to a pension arrangement which provides income drawn down benefits. | | | |
| | | | Benefits taken should be reported in the appropriate category and reported gross of any tax settled by the scheme on behalf of the member by way of deduction from the member's pot. | | | |
| 3.7.2 | | (e) | Payments to and on account of leavers | | | |
| | | | Refunds of contributions in respect of non-vested leavers; | | | |
| | | | (ii) Refunds of contributions in respect of opt-outs; | | | |
| | | | (iii) Purchase of annuities; | | | |
| | | | (iv) Group transfers out to other schemes; | | | |
| | | | (v) Individual transfers out to other schemes. | | | |



| Referenc | e | | | | | |
|----------|--------|-----------|---|-----|-----|----|
| SORP | FRS102 | | | Yes | n/a | No |
| 3.8.29 | | | Disclosure should be made of the method by which group transfers have been effected, where these have been other than by a cash payment (e.g. transfer of securities). | | | |
| 3.7.2 | 34.37 | (f) | Other payments | | | |
| | | | (i) Premiums on term assurance policies; | | | |
| | | | (ii) Any other category of expenditure which does not naturally fall into the above classifications, suitably described and analysed where material. | | | |
| 3.7.2 | 34.37 | (g) | Administrative expenses Suitable analysis of administrative expenses should be provided where material. | | | |
| 3.7.2 | | (h) | Net additions (withdrawals) from dealings with members | | | |
| | | | (the sub-total of items A(a) to A(g)). | | | |
| | | (B) Retur | ns on investments | | | |
| 3.7.2 | 34.37 | (a) | Investment income | | | |
| | | | (i) Dividends from equities; | | | |
| | | | (ii) Income from bonds; | | | |
| | | | (iii) Income from pooled investment vehicles; | | | |
| | | | (iv) Net rents from properties (any material netting-off should be separately disclosed); | | | |
| | | | (v) Interest on cash deposits; | | | |
| | | | (vi) Income from derivatives (e.g. net swap receipts/payments); | | | |
| | | | (vii) Annuity income; | | | |
| | | | (viii) Other – For example, from stock-lending, underwriting or SPVs. | | | |
| 3.7.2 | 34.37 | (b) | Change in market value of investments | | | |
| | | | Change in market value of investments should include realised gains/(losses), unrealised gains/(losses) and changes in the sterling value of assets, including cash, caused by | | | |
| 070 | 04.07 | | changes in exchange rates. | | | _ |
| 3.7.2 | 34.37 | (c) | Taxation Investment income should be recognised at an amount including withholding taxes but excluding any other taxes, such as attributable tax credits not payable wholly on behalf of the recipient. Any withholding tax that is irrecoverable should be shown separately as a tax charge, together with any tax on trading activities. Irrecoverable VAT should increase the cost to which it relates. | | | |
| 3.7.2 | 34.37 | (d) | Investment management expenses Suitable analysis of investment management expenses | | | |
| 070 | | | should be provided where material. | _ | _ | _ |
| 3.7.2 | | (e) | Net returns on investments (the sub total of items B(a) to B(d)). | | | |
| 3.7.2 | | (f) | Net increase or (decrease) in the fund | | | |
| | | x-7 | The use of 'surplus' or 'deficit' should be avoided in describing the difference between inflows and outflows as their use may mislead the user into believing that the financial | | | J |



| Reference | | | | | | | |
|-----------|--------------------|------|-----------|---|-----|-----|----|
| SORP | FRS102 | | | | Yes | n/a | No |
| | | | | ements in some way reflect an improvement or prioration in the actuarial position during the period. | | | |
| 3.7.2 | | | Opening | net assets of the scheme | | | |
| 3.7.2 | | | Closing n | et assets of the scheme | | | |
| 3.9 | | (11) | | nt of Net Assets (available for benefits) blue must be included. | | | |
| 3.9.2 | 34.38(a), 34.41 | | (a) Inve | estment assets | | | |
| 3.11.1 | | | (i) | Equities; The SORP recommends that holdings in investment trust companies (ITCs) are classified as an equity if the holding is part of a wider equity portfolio or as a pooled investment vehicle if it is held to obtain exposure to the underlying investments. | | | |
| | | | (ii) | Bonds; | | | |
| | | | (iii) | Property; | | | |
| | | | (iv) | Pooled investment vehicles; | | | |
| | | | (v) | Derivative contracts; | | | |
| | | | | (Including futures, options, forward foreign exchange contracts and swaps); | | | |
| | | | (∨i) | Insurance policies; (With-profits contracts, unitised with-profits contracts and annuity and deferred annuity contracts). | | | |
| 3.12.17 | 28.15(b) | | | FRS 102 requires annuities (insurance policies exactly matching the amount and timing of some or all of the benefits payable under the plan) to be valued at fair value. Fair value is deemed to be the present value of the related obligations. Annuity contracts purchased in the name of the member which legally discharge the Trustees from providing benefits under the scheme should not be included in the financial statements. | | | |
| 3.9.2 | | | (∨ii) | Other investments; | | | |
| | | | | If the scheme holds material categories of other investments not covered by the above, disclosure should be made taking into account the nature and size of the investments. | | | |
| 3.9.2 | | | (∨iii) | Separately invested AVC funds; | | | |
| 3.9.2 | | | (ix) | Cash deposits; Cash deposits should include fixed term deposits, certificates of deposit, floating rate notes and other cash instruments. | | | |
| 3.9.2 | | | (x) | Other investment balances. 'Other investment balances' could include: Debtors in respect of investment transactions where these form part of the net assets available for investment within the investment portfolio; Other assets directly connected with investment transactions; | | | |



| Reference | | | | |
|-------------|---|-----|-----|----|
| SORP FRS102 | | Yes | n/a | No |
| | Accrued dividend entitlements and recoverable withholding tax. | | | |
| | These should be suitably analysed where material. | | | |
| 3.10.8 | Analysis of pooled investment vehicles: For pooled investment vehicles, disclosure should be made of the type of fund, such as equity, bond, property, hedge funds, diversified growth funds, private equity funds, infrastructure funds and other. | | | |
| 3.10.6 | Derivative disclosures: | | | |
| | Derivative contracts should be disclosed separately under 'investments'. Derivative investments with positive values should be included in the Statement of Net Assets as assets and those with negative values should be separately included in the Statement of Net Assets as liabilities. These balances should not be offset unless there is a legal right of offset. | | | |
| 3.10.6 | In addition: | | | |
| | An explanation should be given of the objectives and policies for holding derivatives; | | | |
| | The accounting policies should include a description of the basis of valuation for derivatives; | | | |
| | Derivatives should be disclosed according to their type. The most commonly used are futures, swaps, options and forward foreign exchange contracts. Derivatives contracts should be further analysed between exchange traded and over the counter contracts; | | | |
| | The key details of the contracts in place at the end of the financial year are disclosed. This could include the types of contracts, an indication of the period covered by the contracts, the counterparties to the contracts, the nominal values or gross exposures of the contracts, the values of the contracts at the year end and whether they are assets or liabilities. The key contract details may be aggregated, for example by the terms of the contract. Disclosures relating to derivatives may be presented as a separate note or included within the risk disclosures required by FRS 102 (see SORP 3.15.1 to 3.15.11). It is not necessary to provide detailed comparatives for the key contract disclosures recommended above. | | | |
| 3.19.1 | Repurchase and Reverse Repurchase agreements: | | | |
| | When a pension scheme enters a repurchase (repo) transaction, the scheme continues recognising and valuing the securities that are delivered out as collateral, and disclosing them in the notes to the financial statements as the scheme retains substantially all the risks and rewards of the ownership of the securities. The cash received is recognised as an asset, the obligation to pay it back is recognised as a payable amount. Where possible and material the interest is accrued and included in the payable amount to recognise the higher price when 'buying back' the securities. | | | |



| Reference | Э | | | | | | |
|--------------------|----------|-----|--|---|-----|-----|----|
| SORP | FRS102 | | | | Yes | n/a | No |
| 3.19.2 | | | the co no rec rec acc rec 're | hen a pension scheme enters a reverse repo transaction, e scheme does not recognise the securities received as llateral in its financial statements as the scheme does t have the economic benefits. The scheme does cognise the cash delivered to the counterparty as a ceivable in the financial statements. Where possible and aterial, the interest is crued and included in the receivable amount to cognise the higher price due to be received when selling' the securities. The securities received as lateral are disclosed in the financial statements. | | | |
| 3.9.2 | 34.38(b) | (b) | Inve | estment liabilities | | | |
| | | | (i) | Derivative contracts | | | |
| | | | | (Including futures, options, forward foreign exchange contracts and swaps). | | | |
| | | | (ii) | Other investment balances (Such as creditors in respect of investment transactions and other liabilities directly connected with investment transactions). | | | |
| 3.9.2 | | (C) | Cur | rent assets | | | |
| | | | (i) | Contributions due from employer | | | |
| 3.10.10 | | | (ii) | Other current assets. | | | |
| | | | | Cash balances and other current assets not forming part of the investment assets. | | | |
| 3.9.2 | | (d) | Cur | rent liabilities | | | |
| 3.10.10 | | | (i) | Unpaid benefits; | | | |
| | | | (ii) | Other liabilities (such as accrued expenses). Other current liabilities not forming part of the investment assets. | | | |
| 3.6.5 | 2.52 | | | Note: Assets and liabilities should not be offset unless there is a legally enforceable right to set off the assets and liabilities and the scheme intends either to settle on a net basis, or to realise the asset and settle the liability simultaneously i.e. they would survive the insolvency of the counterparty. This means that where there is no legal right of offset, as will be the case in most instances, the total asset and the total liability value should be disclosed separately on the face of the Statement of Net Assets. | | | |
| 3.9.2 | | (e) | Tota | al net assets | | | |
| | | Oth | ner di | sclosures | | | |
| | | Rep | | on Actuarial Liabilities | | | |
| 3.34.7 – 3.34.8 | | | the at th the Rep | espect of defined benefit schemes, the SORP requires financial statements to refer to the actuarial information ne foot of the Statement of Net Assets explaining that long term obligations to pay benefits are dealt with in the ort on Actuarial Liabilities and not in the financial rements. | | | |



| Reference | | | | | | |
|-----------|-----------------------------|-------|--|-----|-----|----|
| SORP | FRS102 | | | Yes | n/a | No |
| | (111) | Basis | of preparation | | | |
| 3.6.30 | 3.3, 3.4, 3.5 | (a) | Compliance with FRS102 and the SORP | | | |
| | SI 1996/ 1975: 3A (6) | | A statement whether the financial statements have been prepared in accordance with FRS 102 and the SORP: Financial Reports of Pension Schemes (June 2018). | | | |
| | | | In accordance with FRS102, in the event of a departure, the following disclosures should be made: | | | |
| | | | (a) that the Trustees have concluded that the financial statements present fairly the entity's financial position; | | | |
| | | | (b) that they have complied with the FRS except that they have departed from a particular requirement to achieve a fair presentation; and | | | |
| | | | (c) the nature of the departure, including the treatment that the FRS would require, the reason why that treatment would be so misleading in the circumstances that it would conflict with the objective of financial statements, and the treatment adopted. | | | |
| 3.6.31 | FRS 100:6 | | Where the financial statements depart from the SORP, FRS 100 requires a brief description of how the financial statements depart from the recommended practice set out in the SORP, which shall include: | | | |
| | | | (a) For any treatment that is not in accordance with the SORP, the reasons why the treatment adopted is judged more appropriate to the entity's particular circumstances; and | | | |
| | | | (b) Brief details of any disclosures recommended by the SORP that have not been provided, and the reasons why they have not been provided. | | | |
| 3.34.8 – | | (b) | Scope of financial statements | | | |
| 3.34.9 | | | A note to the financial statements should indicate that: | | | |
| | | | The financial statements summarise the transactions of the scheme and deal with the net assets at the disposal of the Trustees; | | | |
| | | | (ii) They do not take account of obligations to pay pensions and other benefits which fall due after the end of the scheme year. | | | |
| | | | The explanation given should be given prominence because the disclosure is fundamental to an understanding of the financial statements and should be made at the foot of the Statement of Net Assets. For a defined benefit scheme, the note should refer the reader to the Report on Actuarial Liabilities, which does take account of the long term liabilities of the scheme. | | | |



| Reference | | | | | | |
|------------------------------|--------|------|--|-----|-----|----|
| SORP | FRS102 | | | Yes | n/a | No |
| 3.27.1 – 3.27.8 | 34.34 | (c) | Multiple benefit structures Schemes with multiple benefit structures, for example hybrid schemes with defined benefit and defined contribution sections, report the two sections separately within the financial statements by adopting a columnar analysis of the income and expenditure attributable to each section within the Fund Account and showing separately the net assets attributable to each section in the Statement of Net Assets. Where disclosure of comparatives is impractical in the primary statements, comparatives are disclosed prominently in the notes. Transfers between the two sections of the scheme are dealt with as transfers between sections in the respective columns within the Fund Account. Transfers between sections should only include funds transferring from one section to another. If the scheme has multiple defined benefit sections or defined contribution sections it is not necessary to report these sections separately. They can be aggregated into one set of figures for defined benefit operations and one set of figures for defined contribution operations. | | | |
| 3.25.2 | | (d) | Defined contribution assets The notes to the financial statements should disclose investments designated to members, investments allocated to members and investments not designated or allocated to members (i.e. held for the general purpose of the scheme). | | | |
| 3.25.1 | | | Where money purchase assets are segregated and cannot be used to pay benefits for anyone other than the member and are separately identifiable to individual members they should be regarded as 'designated' or 'allocated' to members. Where money purchase assets are held on a pooled basis by the investment manager (i.e. the manager cannot identify investments by member) and the administrator keeps records of the allocation of investments by member, the investments are termed 'allocated' to members. | | | |
| 3.25.2 | | | Where designation/allocation exists, a note to the financial statements should explain that money purchase assets are allocated to provide benefits to the individuals on whose behalf the contributions were paid. | | | |
| 3.25.9 | | (e) | Going concern If a decision to wind up the scheme has been taken and the financial statements are prepared on a scheme cessation basis, this should be explained in the basis of preparation note together | | | |
| | | | with the reasons why and the impact, if any, on the bases of valuing the scheme's assets and liabilities should be disclosed in the notes to the financial statements. | | | |
| 3.31.4 | | | Additional disclosures may be required, for example: The resultant change in investment policy; Claims and contingent assets; The extent and accounting treatment of unpaid contributions; An explanation of the role of any independent Trustee appointed; | | | |
| | | | Any temporary embargo on benefit payments; and Likely timescales for winding up, to the extent these can be assessed. | | | |
| 3.31.3 | | | The bases of valuation used should be disclosed in the accounting policies. | | | |
| 3.31.3 3.38.1 – 3.38.3 | | (I∨) | Identification of the financial statements | | | |
| | | | FRS 102 requires the disclosure of the following information in relation to identification of the financial statements: An entity shall disclose the following in the notes: | | | |



| SORP F | RS102 | | a) | The level form of the entity, its country of incorrection and | Yes | n/a | No |
|----------|----------|----|----------------------------------|--|-----|-----|----|
| | | | a) | The level forms of the entity, its equatry of incorrection and | | _ | |
| | | | | The legal form of the entity, its country of incorporation and the address of its registered office (or principal place of business, if different from the registered office); and | | | |
| | | | | A description of the nature of the entity's operations and its principal activities, unless this is disclosed in the business review (or similar statement) accompanying the financial statements. (FRS 102 3.24) | | | |
| | | | prov will k | spect of FRS 102 3.24 (b) the trustees' report will normally ide the required disclosures and where this is the case there be no need for further disclosures in the notes to the financial ements. | | | |
| | | | | spect of FRS 102 3.24(a) this SORP recommends the wing disclosures are made to satisfy the above requirements: | | | |
| | | | — L | egal form – disclose that the scheme is established as a trust; | | | |
| | | | ti re | Country of incorporation – a trust is not incorporated and nerefore this is not directly applicable instead this SORP ecommends disclosure of the legal jurisdiction under which ne trust is established, e.g. English, Scottish or Irish law; and | | | |
| | | | if h d p d t t | address of its registered office (or principal place of business, different from the registered office) – a scheme does not ave a registered office and its operations are typically utsourced to a number of different organisations with ifferent locations so it is not straightforward to identify a rincipal place of business. However, trustees are required to isclose the postal and electronic address for enquiries about the scheme in the trustees' report under Schedule 3 of the Disclosure Regulations and a cross reference to that isclosure. | | | |
| 3.6.12 – | 10.13 (\ | V) | Acco | ounting policies | | | |
| 3.6.15 | 10.14 | | (a) | Accounting policies | | | |
| | | | | When an amendment to an FRS or FRC Abstract has an effect on the current period or any prior period, or might have an effect on future periods, an entity shall disclose the | | | |
| | | | | following:(a) The nature of the change in accounting policy; | | | |
| | | | | (b) For the current period and each prior period | | | |
| | | | | presented, to the extent practicable, the amount of the adjustment for each financial statement line item affected; | | | |
| | | | | (c) The amount of the adjustment relating to periods before those presented, to the extent practicable; and | | | |
| | | | | (d) An explanation if it is impracticable to determine the amounts to be disclosed in (b) or (c) above. | | | |
| | | | | Financial statements of subsequent periods need not repeat these disclosures. | | | |
| | | | | When a voluntary change in accounting policy has an effect on the current period or any prior period, an entity shall disclose the following: | | | |
| | | | | (a) The nature of the change in accounting policy; | | | |
| | | | | (b) The reasons why applying the new accounting policy. provides reliable and more relevant information; | | | |



| Reference | | | | | | |
|-----------|--------|----|---|-----|-----|----|
| SORP | FRS102 | | | Yes | n/a | No |
| | | | (c) To the extent practicable, the amount of the adjustment for each financial statement line item affected, shown separately: | | | |
| | | | - For the current period; | | | |
| | | | - For each prior period presented; and | | | |
| | | | In the aggregate for periods before those presented; and | | | |
| | | ((|) An explanation if it is impracticable to determine the amounts to be disclosed in (c) above. | | | |
| | | | Financial statements of subsequent periods need not repeat these disclosures. | | | |
| | | | The accounting policies which are judged material or critical in accounting for the transactions and net assets, should be explained in the notes. The SORP | | | |
| | | | recommends certain accounting policies as set out below: | | | |
| | (b | | ontributions | _ | | _ |
| 3.8.1 | | (i | Employee contributions, including AVCs, should be accounted for when deducted from members' pay. | | | |
| 3.8.2 | | | Under auto-enrolment, employers auto-enrol eligible employees into the pension scheme. The employees can then opt out of the scheme if they wish within one month of being auto-enrolled. The employer has to remit the first three months' contributions deducted from a member who is auto-enrolled within 22 days (for electronic remittance) or 19 days (for manual remittance) of the third month following the month in which the employee is auto- enrolled. | | | |
| | | | If an employee opts out before contributions are remitted to the scheme the employer returns the contribution to the employee. The SORP recommends that such contributions are not reported by the scheme. | | | |
| | | | If the employee opts out after the employer remits contributions to the scheme, then the scheme refunds the contributions to the employer who returns the contributions to the employee. In this case the contributions are reported by the scheme and the refund of contributions for the opt out by the scheme to the employer is separately reported. | | | |
| | | | The SORP recommends that employee contributions retained by the employer under auto-enrolment legislation are recognised when the employee opt-out period has expired and the employee has not notified their intention to opt out. Thereafter they are recognised in accordance with the policy set out above. | | | |
| | | | If a scheme provides a membership reconciliation in the Trustees' report, the SORP recommends the approach to dealing with employees who are auto-enrolled and who subsequently opt out is disclosed in the Trustees' report, for example, whether new joiners are reported net or gross of opt-outs. | | | |



| Reference | | | | | |
|-------------|-------|--|-----|-----|----|
| SORP FRS102 | | | Yes | n/a | No |
| 3.8.4-3.8.5 | (ii) | Employer normal contributions should be accounted for on the same basis as employee contributions. | | | |
| | | These contributions normally relate to accrual of benefits for current service. If they are expressed as fixed amounts they should be accounted for in the period to which they relate. Some schemes include employer deficit funding in the contribution rates based on salaries or wages, in which case they should be accounted for on the same basis as employee contributions as set out above. Where this is the case the notes to the financial statements should explain that employer normal contributions include deficit funding payments and the amount should be quantified and disclosed in the notes. Where this information cannot be easily extracted from payroll systems without disproportionate cost, this fact should be explained in the notes to the financial statements and the Trustees' Report should explain the rates paid in respect of deficit contributions and current service contribution payments. | | | |
| 3.8.7 | (iii) | Employer augmentation contributions should be accounted for in accordance with the agreement under which they are paid, or in the absence of an agreement, on a cash basis. | | | |
| 3.8.8 | (iv) | Employer deficit funding contributions should be accounted for either on the due dates on which they are payable in accordance with the Schedule of Contributions under which they are paid, or on a receipts basis if earlier than the due dates in the Schedule with the agreement of the employer and Trustees. | | | |
| 3.8.12 | | A Section 75 debt (payable when an employer ceases to be a participating employer and a deficit is identified) should be accounted for when a reasonable estimate of the amount due can be determined. In assessing this estimate the Trustees consider the amount determined by the scheme actuary and agreements with the employer as to how the s75 debt is to be treated. If the s75 debt is met by way of, for example, a guarantee it should not be recognised unless or until an asset arises from the guarantee. For contingent assets see SORP 3.36. | | | |
| 3.8.9 | | The Trustees and employer may agree a recovery plan which is based on deficit funding contributions that are receivable by the scheme when certain triggers are met, for example the payment of a dividend by the employer or the profitability of the employer. Such arrangements and associated triggers are normally set out in the Schedule of Contributions/actuarial valuation/funding proposal and the related deficit funding contributions should be accounted for when they become due under the Schedule of Contributions. | | | |
| 3.8.10 | | Where a deficit contribution is paid to a scheme through the transfer of non-cash assets, a fair value at the date of receipt should be attributed to the assets. The contribution should only be recognised if the non-cash consideration meets the asset recognition criteria set out in FRS 102 (see SORP 3.6.6-3.6.11). | | | |



| Reference | e | | | | | |
|-------------------|--------|-------|--|-----|-----|----|
| SORP | FRS102 | | | Yes | n/a | No |
| 3.8.14 | | (∨) | Contributions receivable under Financial Support Directions or Contribution Notices issued by The Pensions Regulator should be accounted for in accordance with the terms of the Direction or Notice as appropriate, taking into account the Trustees' expectations of the likelihood of receiving the relevant contribution amounts from the employer. | | | |
| 3.8.15 | | (∨i) | Employer other contributions (e.g. for administration or life assurance costs) should be accounted for in accordance with the agreed arrangements. | | | |
| 3.8.16 | | | Additional contribution categories can be added where appropriate. | | | |
| 3.8.17 | (c) | (i) | efits and payments to leavers Benefits and payments to leavers should be accounted for in the period they fall due for payment. | | | |
| 3.8.21 | | (ii) | Where a member has a choice about the form of their benefit, the benefit should be accounted for when the member notifies the Trustees of his/her decision as to what form of benefit s/he will take. | | | |
| 3.8.20 | | (iii) | Where a member has no choice about the form of benefit, the benefit should be accounted for in the period of leaving/retirement/death, being the period in which the liability to pay the benefit arises. | | | |
| 3.8.20 | | (iv) | Where significant benefits are pending member decisions at the year end, for example, bulk exercises, the SORP recommends this is disclosed in the notes to the financial statements with an indication of the amounts involved, if known at the time, together with an explanation that they will be accounted for when the member decisions have been received. Where the member has no choice (for example, is only entitled to a refund, or single cash sum on retirement), accounting entries should be made based on the date of leaving or retirement, which is when the liability to pay the benefit arises. | | | |
| 3.8.22, 3.8.23 | | (v) | From April 2015, members may use their pension pot to purchase an annuity, to take a lump sum benefit equal to the value of the pot less tax at their marginal rate, or to take income draw down benefits from the scheme less tax at their marginal rate. If a scheme does not offer income draw down, members may transfer their pot to a pension arrangement that does provide such facilities. Benefits taken under the above provisions will be reported in the appropriate benefit category, e.g. as | | | |
| | (d) | Tran | commutations or transfer values. Benefits in these categories should be reported gross of any tax paid. sfers | | | |
| 3.8.26 | (0) | (i) | Where past service liabilities do not transfer between schemes until assets/liabilities have been transferred, transfers should be accounted for on a cash basis. | | | |
| 3.8.27 | | (ii) | Group transfers or scheme mergers should be accounted for in accordance with the legal agreement for these transactions. Where Trustees have agreed to accept past service liabilities in advance of the transfer of funds, the transfer should be accounted for in accordance with the terms of the agreement. | | | |



| Referenc | е | | | | |
|----------|--------|--|-----|-----|----|
| SORP | FRS102 | | Yes | n/a | No |
| 3.8.30 | | (ii) If the basis adopted for accruals of group transfers is different from that used in the report on membership statistics included in the Trustees' report, the SORP recommends that the difference, if material, should be disclosed either in the financial statements or the Trustees' Report. | | | |
| | | (e) Expenses | | | |
| 3.8.31 | | (i) Expenses should be accounted for on an accruals basis. | | | |
| 3.8.39 | 29.20 | (ii) FRS 102 requires expenses to exclude recoverable VAT (FRS 102). | | | |
| | | (f) Investment income | | | |
| 3.8.34 | | Dividends from quoted securities should be accounted for when the securities are quoted ex-dividend. | | | |
| 3.8.34 | | Income on bond securities should be accounted for on an accruals basis. Interest purchased and sold on investment transactions should be reported through income on bond securities in the Fund Account. | | | |
| 3.8.34 | | (iii) Rent should be accounted for in accordance with the terms of the lease. | | | |
| 3.8.34 | | (iv) Interest on cash deposits and bonds should be accrued on a daily basis. | | | |
| 3.8.34 | | (v) Investment income arising within pooled investment vehicles which is rolled up in the investment fund and reflected in the value of the units is not separately reported in the scheme's financial statements. Where income is distributed and immediately reinvested to purchase more units it should be reported as investment income and the purchase of units included as an investment purchase in the investment reconciliation table. | | | |
| 3.8.34 | | (vi) Distributions by special purpose vehicles (SPVs) established for scheme funding arrangements (see SORP 3.11.7) will comprise an element of income and capital. If the split of income and capital elements of the distribution is readily obtainable the distribution will be accounted for in part within investment income and in part within sale proceeds of investments. However, if the split between income and capital is not available the SORP recommends receipts are reported as either investment income or sale proceeds with a note disclosing the approach adopted. | | | |
| 3.8.34 | | (vii) Income arising from annuity policies held by the Trustees of a scheme may be paid to the Trustees in order to fund the pension paid by the scheme to the pensioner(s) or it may be paid directly to the pensioner by the annuity provider. In both these circumstances the receipts arising from the annuity policies should be included in the financial statements and the pensions paid to the pensioners included in pension payments. There should be no netting off of these amounts. The receipts from the annuity provider can be apportioned to sale proceeds and investment income or reported all within investment income or sale proceeds. Disclosure of the approach taken should be included in the financial statements and applied consistently from year to year. | | | |



| Reference | | | | | |
|------------------------------|------------|--|-----|-----|----|
| SORP | FRS102 | | Yes | n/a | No |
| 3.8.34 | | (viii) Derivatives – Where the nature of the cash flow is income the net cash flow is reported as investment income. Where the nature of the cash flow is related to an asset or liability the net cash flow is reported within change in market value. Cash flows are analysed at contract level. It is not necessary to allocate cash flows arising from a contract between income and capital unless information is available to do so and the Trustees consider it appropriate in the circumstances. | | | |
| 3.8.36 | 29.25 | (g) Taxation Pension schemes registered with HMRC are exempt from income tax and capital gains tax. FRS 102 and the SORP therefore recommend the notes to the financial statements disclose the tax status of the scheme to explain it is exempt from taxation except for certain withholding taxes (h) Foreign currency translation | | | |
| 3.28.1, 3.28.2 | 30.2 | Pension schemes should determine their functional currency by reference to the currency used in dealings with members. The financial statements must include a translation of any assets and liabilities denominated in other currencies, into the scheme's functional currency. FRS 102 prescribes how to translate financial statements into a presentation currency. | | | |
| 3.28.3, 3.28.4, 3.28.5 | 30.9, 30.7 | Items denominated in a foreign currency should be translated at the scheme year end rate. Transactions executed in foreign currency should be recorded at the spot exchange rate at the date of the transaction. FRS102 allows an approximation to the spot rate for practical purposes, for example the use of an average rate over a given period. If exchange rates fluctuate significantly over the period, the use of an average rate is inappropriate. Exchange gains and losses should be treated as follows: | | | |
| 3.28.6 | 30.10 | (i) FRS 102 requires foreign exchange gains and losses on monetary items to be recognised in profit and loss for the period. The SORP recommends that foreign exchange gains and losses arising from investment activities are reported within the Fund Account within the account caption most relevant to the transaction which gave rise to the gain or loss. For example, foreign exchange gains or losses arising on foreign currency investments and cash balances would be reported within change in market value; | | | |
| 3.28.7 | 30.25 | (ii) FRS 102 requires the disclosure of the amount of foreign exchange differences recognised in profit or loss during the period, except for those arising on financial instruments measured at fair value through profit or loss. Therefore, foreign exchange differences reported within change in market value which arise on financial instruments (such as securities, cash and other investment balances) are not required to be disclosed. Foreign exchange gains and losses arising on investments that are not financial instruments (for example, investment properties) will need to be disclosed. | | | |
| 3.11.11 | 28.15(b) | (i) Valuation of investments (i) Investments should be valued at their fair value at the date of the Statement of Net Assets. | | | |
| 3.11.12 | Glossary | FRS 102 defines fair value as: 'the amount for which an asset could be exchanged, a liability settled between knowledgeable, willing parties in an arm's length transaction.' | | | |



| Reference | | | | | | |
|-----------|--------|--------------|---|-----|-----|----|
| SORP | FRS102 | | | Yes | n/a | No |
| 3.12.1 | 2A.1 | Fair (ii) | value hierarchy (FVH) Quoted securities: fair value should be determined using a quoted price for an identical asset in an active market, usually the current bid price. | | | |
| 3.12.12 | | (iii) | Normally disclosed in Level 1. Bonds should be valued on a clean basis, i.e. excluding accrued income. Any excluded accrued income should be accounted for in 'investment income' and 'other investment balances'. | | | |
| 3.12.13 | 2A.1 | | Exchange traded bonds: normally disclosed in Level 1 or 2. Unquoted bonds or bonds priced using evaluated prices: normally in Level 2. | _ | | |
| 3.12.13 | 2A. I | | Unquoted investments should be included at a fair value estimated by the Trustees. The valuation basis should be disclosed in the financial statements. Normally in Level 3. | | | |
| 3.12.14 | | (v) | Fair values for over the counter derivatives are determined using valuation techniques which depend on the type of derivative. Normally in Level 2. | | | |
| 3.12.15 | | (vi) | Pooled investment vehicles should be included at the closing bid price or, if single priced, at the closing single price. Private equity, infrastructure and other relatively illiquid pooled investment arrangements are normally reported at the net asset value (NAV) of the fund. The NAV should be determined by the pool manager by applying fair value principles to the underlying investments of the pooled arrangement. There may be circumstances where the NAV is not appropriate as a measure of fair value, for example if the Trustees have decided to sell the pooled arrangement in a secondary market. There may be a discount or premium to NAV in a secondary market depending on the circumstances of the pooled arrangement. Therefore if there is a commitment to dispose of the pooled arrangement consideration should be given to adjusting the NAV to reflect the level of discount or premium to the NAV at the reporting date. Exchange traded funds may be Level 1, non-exchange traded funds which are open (i.e. the scheme can buy and sell into and out of the fund without significant restrictions) and are daily, weekly and monthly priced would normally be Level 2. Non-exchange traded funds which are closed (i.e. the scheme cannot sell out of the fund) and are monthly or quarterly priced would normally be Level 3. | | | |
| 3.12.32 | | | Property should be valued in accordance with the Royal Institution of Chartered Surveyors' Valuation Standards UK PS, 1.1, Valuation for Financial Statements, which provides that: (1) Property occupied by the pension scheme, should be valued on the basis of the existing use value; (2) All other properties, other than specialised properties should be valued at market value; and (3) Specialised properties should be valued at depreciated replacement cost. | | | |
| 3.12.34 | | | The SORP allows for asset valuations to be carried out at least every three years, in line with actuarial valuations. | | | |
| 3.12.35 | | | Where the valuation of investment properties is not at the reporting date, for example where the rolling valuation approach is adopted, consideration should be given to the need for a fair value adjustment to the latest valuation to the reporting date using appropriate market information such as property indices. Normally in Level 2 or 3. | | | |



| Reference | e | | | | |
|-----------|----------|--|-----|-----|----|
| SORP | FRS102 | | Yes | n/a | No |
| 3.12.16 | | (viii) Insurance policies Unit linked or unitised insurance policy values fluctuate directly in relation to the fair value of the asset class or classes that constitute the investments underlying the insurance policies. These policies should be valued on | | | |
| 3.12.17 | 28.15(b) | the same basis as pooled investment vehicles. FRS 102 requires annuities, which FRS 102 defines as an insurance policy that exactly matches the amount and timing of some or all of the benefits payable under the plan, to be valued such that the fair value of the asset is deemed to be the present value of the related obligation. | | | |
| 3.12.18 | | The present value of the related obligation will depend on the basis of the valuation of the scheme liabilities. Trustees should adopt a reasonable basis, such as scheme funding valuation, buy-out or the basis set out in FRS 102 for employer accounting, for valuing annuities and apply it consistently. If the valuation is carried out by the annuity provider possible bases include the actuarial method or the net premium method. | | | |
| 3.12.20 | | If a scheme is using a valuation approach that is linked to a periodic full valuation of scheme liabilities, for example, the scheme funding valuation, it may be more cost effective to adopt a roll-forward approach to the valuation of annuities for reporting dates that fall in between full valuations. A roll- forward of annuity value should take into account any changes between the date of the previous valuation and the reporting date which are significant to the valuation, for example, cash flows arising under the annuity, changes to the discount rate, changes to the terms of the annuity contract or significant changes to the scheme members covered by the annuity. | | | |
| 3.12.21 | | The basis adopted should be disclosed in the financial statements. The valuation should be carried out by a suitably qualified person or organisation who should be disclosed in the financial statements. The nature of benefits covered by the annuity and any collateral arrangements in place should also be disclosed in the financial statements. | | | |
| 3.12.23 | | Normally Level 3. With-profit insurance policies should be reported at an estimate of their fair value which will normally be the on- going value of the policy based on the cumulative reversionary bonuses declared and the current terminal bonus. If there is a commitment to redeem the policy then surrender value should be used. Under FRS 102, which requires fair value to be determined on an 'exit' value rather than an 'entry value' the use of an actuarial value or premium value is not appropriate. The SORP recommends disclosing the name of the insurance company and the valuer of the policy. Normally Level 3. | | | |



| Referenc | е | | | | | |
|-----------------------|--------|--|--|-----|-----|----|
| SORP | FRS102 | | | Yes | n/a | No |
| 3.12.24 | | (ix) | Longevity swaps The fair value of the longevity swap should be based on the expected future cash flows arising under the swap discounted using market interest rates. The cash flows are discounted using market based interest rates, taking into account credit risk and liquidity premium appropriate for the circumstances. Projected variable cashflows also need to take into account current market views of longevity. At inception a longevity swap is normally valued at nil, since no consideration passes between the scheme and the counterparty. In order to achieve a nil value at inception where the swap contract includes cash flows from the scheme to the counterparty in respect of expenses, fees and margins, the variable (receivable) leg of the swap is discounted using a rate which reflects the risk premium. Normally Level 3. | | | |
| 3.12.25 3.12.31 | | (×) | Special Purpose Vehicles (SPVs) SPVs should be included at fair value. Notwithstanding the illiquid nature of these arrangements and a lack of an active market, a fair value can be determined using valuation techniques. These arrangements are highly illiquid and in some cases the arrangements cannot be sold on to third parties. The SORP recommends that if an SPV is highly illiquid then this is disclosed in the scheme financial statements. | | | |
| 3.26.3 - 3.26.6 | (| AVC payr finar SOF AVC that isola | Normally Level 3. cional voluntary contributions (AVCs) as and related investments, investment returns and benefit ments are accounted for within the pension scheme's ncial statements in accordance with FRS 102 and the RP. Where the scheme documentation requires that the as must be used to provide money purchase benefits and the AVC assets must be separately identifiable and ted from other scheme assets and liabilities, AVC assets uld be accounted for in a manner consistent with the | | | |
| | | The inclu state part | tment of defined contribution assets as described above. notes to the pension scheme financial statements should ide an explanation of the type of AVC arrangement and e how the AVCs are invested (for example as an integral of the scheme's assets or with third parties and, in the | | | |
| | | If A inve bene inve can with | er case, the institution and type of fund). /C assets are held within a scheme's defined contribution stments, for example in a hybrid scheme where defined efit members can invest AVCs in the defined contribution stment arrangements, the AVCs and related investments be reported within the defined contribution section disclosure of the amounts relating to AVCs and investments. | | | |
| | | If the year infor end, Simi nece allov state adjus | e provider does not supply information as at the scheme rend, the financial statements should include the mation at a date as near as practicable to the scheme year adjusted for cash movements in the intervening period. darly, where practical difficulties arise in obtaining the essary up to date information within the limited period ved for preparation of financial statements, the financial ements should use the latest available information, sted for subsequent cash movements, and explain the tment adopted in the notes to the financial statements. | | | |



| Reference | | | | | |
|--------------------|-----------------------------------|--|-----|-----|----|
| SORP | FRS102 | | Yes | n/a | No |
| | (VI) Other | r disclosures | | | |
| 3.20.1 – 3.20.2 | (a) | Stock lending Where the scheme's investment custodian is authorised to release stock to a third party under a stock lending arrangement, (even if no stock lending activity has taken place in the year), the fact should be disclosed. Disclose the total value of securities out on loan together with an analysis by asset class of the securities out on loan and a description of the related types of | | | |
| 3.10.8 | (b) | collateral. The fair value of collateral held should be disclosed. Repurchase and reverse repurchase agreements The SORP recommends the following additional disclosures: Balances due and payable arising under repurchase agreements and reverse repurchase agreements and amount of securities sold which are subject to repurchase contracts. | | | |
| 3.14.1– 3.14.2 | (c) SI 1996/ 1975 3A (5) | Investment Reconciliation Table The SORP and the Audited Accounts Regs require the disclosure of sales and purchases of investment. The SORP recommends that this information together with the changes in value during the period should provide a reconciliation between the opening and closing value of investments, analysed by asset class as disclosed on the face of the Statement of Net Assets as a minimum. Cash and other investment balances, such as broker balances, are not required to be included in this reconciliation. Where there are derivative receipts and payments these amounts should be described as 'purchases at cost and derivative payments' and 'sales proceeds and derivative receipts. Where purchase cost or sales proceeds include accrued income, for example on bond securities, these should be excluded from investment purchases and sales and reported through investment income in the Fund Account. No comparative information is required. | | | |
| 3.8.45 – 3.8.47 | (d) 12.7,16.5 | Transaction costs Transaction costs should be added to purchase costs and netted against sale proceeds, as appropriate. The total amount of direct transaction costs on all investment types (including property, derivatives contracts and the costs associated with aborted investments) should be disclosed in the notes to the financial statements under the investment reconciliation table. Direct transaction costs should be analysed for each significant asset class disclosed in the investment reconciliation table. The analysis should include disclosure of the amount of each type of direct transaction cost. Explanations should be given to enable users of the financial statements to understand the nature of transaction costs and how they arise for different types of investment. Indirect costs such as bid-offer spread costs and costs charged within pooled investment vehicles do not need to be disclosed but the notes to the financial statements should explain their existence. | | | |



| Referenc | e | | | | | |
|---------------------|--------|-----|--|-----|-----|----|
| SORP | FRS102 | | | Yes | n/a | No |
| | 34.42 | (e) | Fair Value Hierarchy Disclosure | | | |
| | | | FRS102 requires the disclosure, for each class of asset, of an analysis of the level in the following hierarchy into which fair value measurements are categorised. | | | |
| | | | Level 1: The unadjusted quoted price in an active market for identical assets or liabilities that the entity can access at the measurement date. | | | |
| | | | Level 2: Inputs other than quoted prices included within Level 1 that are observable (i.e. developed using market data) for the asset or liability, either directly or indirectly. | | | |
| | | | Level 3: Inputs are unobservable (i.e. for which market data is unavailable) for the asset or liability. | | | |
| | | | A fair value measurement is categorised in its entirety on the basis of the lowest level input that is significant to the fair value measurement in its entirety. | | | |
| | | (f) | Investment risk disclosures | | | |
| | | | FRS 102 requires certain disclosures in relation to risks arising from financial instruments: | | | |
| 3.15.1 | 34.43 | | A retirement benefit plan shall disclose information that enables users of its financial statements to evaluate the nature and extent of credit risk and market risk arising from financial instruments to which the retirement benefit plan is exposed at the end of the reporting period. | | | |
| 3.15.4 | 34.44 | | For each type of credit and market risk arising from financial instruments, a retirement benefit plan shall disclose: | | | |
| | | | (a) The exposures to risk and how they arise; | | | |
| | | | (b) Its objectives, policies and processes for managing the risk and the methods used to measure the risk; and | | | |
| | | | (c) Any changes in (a) or (b) from the previous period. | | | |
| 3.15.5 | | | FRS 102 requires these risk disclosures for financial instruments only, which would exclude other investments such as investment properties. The SORP recommends that the risk disclosures required by FRS 102 are applied to all investments reported at fair value in the Statement of Net Assets including, for example, investment properties. | | | |
| 3.15.6 | | | These disclosures are required for both defined benefit and defined contribution scheme investment assets (including AVC assets), subject to materiality. | | | |
| 3.15.7 | | | The SORP recommends pension schemes disclose for significant risk exposures, the value of investment assets and liabilities subject to each risk at the reporting | | | |
| | | | date (and for the comparative reporting date) or suitable alternative information. | | | |
| 3.15.8 - 3.15.11 | | | The notes to the financial statements should explain how the risks arise in the context of the scheme's investment strategy. For example, foreign exchange risk arises where the Trustees have chosen to diversify the investment portfolio into securities priced in foreign currencies. Credit risk will arise in bond portfolios which could be part of a liability driven investment strategy. | | | |
| | | | Disclosures relating to the objectives, policies and processes for managing the risks and the methods used to measure the risks should explain how the Trustees | | | |



| Reference | 2 | | | | |
|-----------|--------|--|-----|-----|----|
| SORP | FRS102 | | Yes | n/a | No |
| | | set their investment strategy, how this is translated into investment guidelines and limits for investment managers and an explanation of the Trustees' approach to monitoring investment risks through management information. For example, where the Statement of Investment Principles (SIP) sets out the asset allocation for the scheme, it may be useful to explain the investment risk management process in the context of the SIP, how investment assets are allocated in accordance with the SIP and how they are monitored for compliance with the SIP. | | | |
| | (g | | | | |
| 3.15.14 | 34.45 | A description of collateral held as security and of other credit enhancements, and the extent to which these mitigate credit risk. | | | |
| 3.15.15 | | The amount and nature of collateral held at the reporting date, stated at fair value, should be included in the notes to the financial statements, with an indication of the class of investment included in the Statement of Net Assets to which it relates. Typical arrangements with collateral are over the counter derivatives, repurchase arrangements (repos) and stock lending. | | | |
| 3.15.16 | 34.45 | The amount by which any related credit derivatives or similar instruments mitigate that maximum exposure to credit risk. | | | |
| 3.15.17 | | The SORP recommends additional disclosures relating to derivatives in paragraph 3.10.8. If derivatives are held to mitigate credit risk relating to other financial instruments, it would normally be appropriate to include this information with the disclosures required for derivatives. | | | |
| 3.15.18 | 34.45 | Information about the credit quality of financial assets that are neither past due nor impaired. | | | |
| 3.15.19 | | The above requires the disclosure of the credit quality of bond portfolios and other financial assets subject to credit risk. The SORP recommends as a minimum that pension schemes disclose investment grade, non-investment grade and unrated financial assets. There is no industry standard definition of investment and non-investment grade. Therefore Trustees should agree with the provider of credit quality information the basis of this classification and apply it consistently across investments and from one year to the next. | | | |
| 3.15.20 | | Where a scheme has had to take possession of collateral during the way ERS 102 requires the following disclosures: | | | |
| | 34.46 | during the year FRS 102 requires the following disclosures: When a retirement benefit plan obtains financial or non-financial assets during the period by taking possession of collateral it holds as security or calling on other credit enhancements (such as guarantees), and such assets meet the recognition criteria in other sections, a retirement benefit plan shall disclose: | | | |
| | | (a) The nature and carrying amount of the assets obtained; and | | | |
| | | (b) When the assets are not readily convertible into cash, its policies for disposing of such assets or for retaining them. | | | |
| | | Investment risk disclosures for pooled investment vehicles: | | | |



| Referenc | | | 14 | | |
|----------------|-------------------------|--|-----|-----|----|
| SORP | FRS102 | | Yes | n/a | No |
| 3.16.7 | | The SORP recommends the financial statements disclose the type of pooled arrangement and the Trustees' approach to managing and monitoring the associated direct credit risk. | | | |
| | | The SORP recommends that risk disclosures are considered at the unit of investment level. This may be units in a fund or a share of a fund such as an interest in a partnership. In this case, the Trustees make enquiries to the pooled fund manager to determine if the unit of investment is subject to change in value arising from market and credit risks and which types of market risk. The whole value of the pooled fund is then disclosed in the relevant risk analysis with an explanation of the Trustees' approach to investing in the pooled arrangement. | | | |
| 3.17.1 | SI 1996/1975: 3A (2) | Particulars are required of any investment (other than UK Government Securities) in which more than 5% of the total value of the net assets of the scheme is invested. There is no need to adopt a 'look through' approach unless the Trustees control the investment mandate of the pooled investment vehicle. | | | |
| 3.16.13 | | Where a scheme invests in a pooled investment vehicle where the Trustees have control over the investment mandate, for example, where the Trustees are the sole investor, the SORP recommends that the risk disclosures required by FRS 102 as described above are disclosed on a 'look through' basis as if the scheme held the investments in the pooled arrangement directly. | | | |
| | | Sole investor pooled arrangements | | | |
| 3.21 3.21.1 | | A pension scheme may be the sole investor in a pooled arrangement, for example, liability driven investment funds typically set up as a Qualifying Investment Fund (QIF). | | | |
| 3.21.2 | Glossary | FRS 102 does contain consolidation requirements in relation to Special Purpose Entities and it is arguably the case that sole investor funds would be consolidated under these requirements. However, FRS 102 requires investments held exclusively with a view to subsequent resale to be reported at fair value and not consolidated. FRS 102 defines 'held exclusively with a view to subsequent resale' in its Glossary and this definition includes interests held as part of an investment portfolio, which is in turn defined in FRS 102's Glossary as: | | | |
| | | 'an interest is held as part of an investment portfolio if its value to the investor is through fair value as part of a directly or indirectly held basket of investments rather than as media through which the investor carries out business. A basket of investments is indirectly held if an investment fund holds a single investment in a second investment fund which, in turn, holds a basket of investments.' | | | |
| 3.21.3 | | Where this is the case, the SORP recommends that the scheme's investment should continue to be reported as an interest in a pooled arrangement with disclosure as follows: | | | |
| | | An explanation that the scheme is the sole investor in the pooled arrangement; and | | | |
| | | A summary of the pooled arrangement's assets and liabilities at the reporting date. | | | |



| Referen | c e | | | | | |
|-------------------|-------------------------|-----|--|-----|-----|----|
| SORP | FRS102 | | | Yes | n/a | No |
| 3.21.4 | | | The investment risk disclosures required by FRS 102 should be made using the "look through" approach for sole investor pooled arrangements. | | | |
| 3.10.4, 3.10.5 | 16.10 | (h) | Valuation of freehold and leasehold property | | | |
| 3.10.5 | | | FRS 102 requires the following to be disclosed in relation to investment property valuations: | | | |
| | | | The methods and significant assumptions applied in determining the fair value of investment property; | | | |
| | | | (ii) The extent to which the fair value of investment property (as measured or disclosed in the financial statements) is based on a valuation by an independent valuer who holds a recognised and relevant professional qualification and has recent experience in the location and class of the investment property being valued. If there has been no such valuation, that fact shall be disclosed; | | | |
| | | | (iii) The existence and amounts of restrictions on the reliability of investment property or the remittance of income and proceeds of disposal; and | | | |
| | | | (iv) Contractual obligations to purchase, construct or develop investment property or for repairs, maintenance or enhancements. | | | |
| | | | In relation to investment properties the SORP recommends that the notes to the financial statements should disclose the name, or employing firm, and qualification of the valuer and should disclose, where relevant, that the valuer is an employee of the scheme or participating employer(s). The date(s) and basis (or bases) of valuation should also be disclosed. Disclosure should also be made of the basis of any fair value adjustments to latest available valuations at the reporting date. | | | |
| | | (i) | Employer-related investments | | | |
| 3.33.3 | SI 1996/1975: 3A (3) | | Where a scheme has employer-related investments, the financial statements should include a statement: | | | |
| | | | Giving the percentage of the scheme's net assets invested in employer-related investments at the end of the scheme year; | | | |
| | | | (ii) If that percentage exceeds 5%, giving the percentage of the scheme's net assets which are employer-related investments of a type on which, under the Occupational Pension Schemes (Investment) Regulations 2005, there is no restriction (see Additional Guidance). | | | |
| | | | (iii) Where employer-related investments exceed the statutory restrictions, the steps the Trustees or managers of the scheme have taken, or propose to take, to secure that the scheme complies with the restrictions and the time when any proposed steps will be taken. | | | |
| 3.33.4 | | | The SORP recommends that, where practical, the percentage of employer-related investment at the year end is disclosed, but where this is impractical, the Trustees make a reasonable estimation of the percentage of employer-related investment, if any, and disclose whether it is above or below the statutory restriction of 5%. Where it is estimated to be above 5% the Trustees should consider the disclosures required in relation to the steps to be taken to bring the level below the statutory restriction. | | | |



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| Referenc | e | | | | |
|----------|--------|--|-----|-----|----|
| SORP | FRS102 | | Yes | n/a | No |
| 3.32.14 | | This disclosure would normally relate to remuneration of Trustees for their services to the scheme, whether paid by the scheme or by another entity such as the employer. It would not normally apply to remuneration of scheme management for example the pension manager, since the pension manager would not normally be considered key management personnel. | | | |
| 3.32.17 | 33.9 | FRS 102 requires the following disclosures in relation to related party transactions: | | | |
| | | If an entity has related party transactions, it shall disclose the nature of the related party relationship as well as information about the transactions, outstanding balances and commitments necessary for an understanding of the potential effect of the relationship on the financial statements. These disclosure requirements are in addition to the requirements to disclose key management personnel compensation. At a minimum, disclosures shall include: | | | |
| | | (a) The amount of the transactions. | | | |
| | | (b) The amount of outstanding balances and: | | | |
| | | Their terms and conditions, including whether they are secured, and the nature of the consideration to be provided in settlement; and | | | |
| | | (ii) Details of any guarantees given or received. | | | |
| | | (c) Provisions for uncollectible receivables related to the amount of outstanding balances; and | | | |
| | | (d) The expense recognised during the period in respect of bad or doubtful debts due from related parties. | | | |
| 3.32.18 | 33.9 | Such transactions could include purchases, sales, or transfers of goods or services, leases, guarantees and settlements by the entity on behalf of the related party or vice versa. | | | |
| 3.32.18 | 33.10 | An entity shall make the disclosures required by FRS 102:33.9 separately for each of the following categories: | | | |
| | | (a) Entities with control, joint control or significant influence over the entity; | | | |
| | | (b) Entities over which the entity has control, joint control or significant influence; | | | |
| | | (c) Key management personnel of the entity or its parent (in the aggregate); and (d) Other related parties. | | | |
| 3.32.18 | 33.13 | An entity shall not state that related party transactions were made on terms equivalent to those that prevail in arm's length transactions unless such terms can be substantiated. | | | |
| 3.32.19 | 33.14 | An entity may disclose items of a similar nature in the aggregate except when separate disclosure is necessary for an understanding of the effects of related party transactions on the financial statements of the entity. | | | |



| Reference | ; | | | |
|-----------|--|-----|-----|----|
| SORP | FRS102 | Yes | n/a | No |
| 3.32.20 | The following are examples of transactions for which it would normally be sufficient to make disclosures on an aggregated basis: | | | |
| | Payment of employer and employee contributions – Employer contributions and employee contributions are normally disclosed in aggregate in the Fund Account (or notes thereto) and further information on a disaggregated basis (such as names and contributions of each employer) is normally unnecessary; | | | |
| | (b) Payment of fees and expenses paid to Trustees by the scheme, in aggregate, should be separately disclosed. Where Trustees are paid by the employer and this is not recharged to the Scheme, the amount paid to the Trustees in aggregate should be disclosed in the notes to the financial statements. Where Trustees are paid employees of the sponsoring employer and carry out Trustee duties in company time, this does not require such disclosure as a related party transaction. However, payments for goods or services to Trustees or Scheme advisers outside the normal course of business (such as the purchase of an asset from a Trustee or adviser) would require disclosure as a related party transaction. | | | |
| 3.32.21 | Trustees may be in receipt of pension benefits through the scheme or contributions may have been paid in respect of Trustees. Provided these transactions arise solely in the individual's capacity as a beneficiary of the pension scheme and are either non-discretionary or are made on terms normally granted to members, the disclosure of individual transactions is normally unnecessary. It would normally be sufficient to disclose the status of the Trustee as a person in respect of whom contributions have been paid or as a person in receipt of benefits. | | | |
| 3.32.22 | Where administration costs, investment management expenses and other services such as secretarial and management support are borne directly by a participating employer and not recharged to the scheme, that fact should be disclosed as a related party transaction. In such cases, disclosure of the amounts involved is unnecessary as there is no 'cost' to the scheme. | | | |
| | (k) Common Investment Funds (CIFs) | | | |
| 3.22.2 | Where a scheme participates in a CIF disclose the scheme's interest in the CIF i.e. number of units or share of fund, at the beginning or end of the scheme year and either: | | | |
| | (a) Include the financial statements of the CIF within the annual report; or | | | |



| Referen | ice | | | | |
|---------|-----------------|--|-----|-----|----|
| SORP | FRS102 | | Yes | n/a | No |
| | | (b) Provide equivalent details of the CIF's portfolio and income and state the scheme's proportionate share thereof. | | | |
| 3.22.4 | | The CIF's financial statements will show a true and fair View under UK/Irish GAAP and will therefore be prepared in accordance with FRS 102. The CIF will value its investments at fair value in accordance with FRS 102's fair value methodology. The CIF trustees decide whether the CIF is a Financial Institution as set out in the Glossary to FRS 102. If they decide it is the CIF follows the financial instrument disclosures set out in FRS 102 for Financial Institutions and this SORP recommends it also follows the additional investment disclosures recommended by this SORP for pension schemes. If they decide it is not a Financial Institution this SORP recommends that the CIF financial statements are prepared in accordance with FRS 102 and this SORP as if pension investment disclosure requirements apply and therefore contain the fair value hierarchy and risk disclosures in relation to investments that would be disclosed as if it were a pension scheme. | | | |
| 3.22.5 | | The SORP further recommends that where the CIF financial statements are included in the scheme's Annual Report then the scheme financial statements disclose the fair value and risk disclosures at the share of CIF level, for example, units in the CIF. If the scheme financial statements include equivalent details of the CIF's portfolio then they should also include the related risk and fair value disclosures. | | | |
| | | The disclosures made in the annual report, taken together, need to comply with the SORP and relevant regulations in relation to investment disclosures. | | | |
| | | (I) Subsidiaries, associates and joint ventures | | | |
| 3.23.1 | | If a pension scheme has subsidiaries, joint ventures or associates it needs to consider its approach to these in its financial statements. FRS 102 has the following requirements that need to be taken into account: | | | |
| | 9.2,9.3 | Pension schemes are not required to prepare consolidated financial statements under FRS 102 but may choose to do so; | | | |
| | 34.36 | Investments in subsidiaries, associates and joint ventures are reported in the scheme's Statement of Net Assets at their fair values; | | | |
| | 9.9(b), 9.9C | A subsidiary shall be excluded from consolidation and included at fair value in the consolidated statement of net assets where the investment in the subsidiary is held exclusively with a view to subsequent resale. | | | |
| | Glossary | — FRS 102's definition of held exclusively with a view to subsequent resale includes an interest which is held as part of an investment portfolio. FRS 102 defines that an interest is held as part of an investment portfolio if its value to the investor is through fair value as part of a directly or indirectly held basket of investments rather than as a medium through which the investor carries out business. | | | |



| Refere | FRS102 | | Yes | n/a | No |
|--------|----------|---|-----|-----|----|
| 3.23.2 | | Consequently, where a subsidiary is held as part of the scheme's investment portfolio it will be reported at fair value in the scheme's Statement of Net Assets and if the scheme chooses to prepare consolidated financial statements the Trustees consider whether the subsidiary falls to be consolidated or reported at fair value under FRS 102 as described above in the consolidated Statement of Net Assets. | | | |
| | Glossary | Where a subsidiary is not held exclusively with a view to resale, for Example, a trading subsidiary, it will be reported in the scheme's Statement of Net Assets at fair value, and if the scheme chooses to prepare consolidated financial statements it will consolidate the subsidiary and comply with the requirements of Section 9 of FRS 102 in relation to consolidated financial statements. | | | |
| 3.23.4 | | Where a pension scheme holds investments in a subsidiary and does not produce consolidated financial statements, the SORP recommends that a summary of the underlying net assets is disclosed, or if there are a number of subsidiaries, the aggregate net assets of the subsidiaries are disclosed. | | | |
| 3.23.5 | | FRS 102 requires the following disclosures: | | | |
| | 9.27 | Whether the financial statements are consolidated or non-consolidated; | | | |
| | | If the financial statements are non-consolidated the basis under FRS 102 by which the scheme is exempt from preparing consolidated financial statements. This will normally be FRS 102:9.3 (g) as the statutory framework for pension scheme financial reporting does not require consolidation; and | | | |
| | | If the financial statements are non-consolidated, a description of the methods used to account for the investments in subsidiaries, joint ventures and associates. | | | |
| 3.23.6 | | For consolidated subsidiaries where there is goodwill, for example in trading subsidiaries, differences may arise between the parent and consolidated Statement of Net Assets because under FRS 102 goodwill cannot be revalued and has to be amortised whereas shares in subsidiaries at fair value will include revalued goodwill. If the net asset values on a consolidated and non-consolidated basis are significantly different and the scheme chooses to prepare consolidated financial statements it will also have to prepare a parent Statement of Net Assets: | | | |
| | | (m) Annuity contracts | | | |
| | | Buy-ins | | | |
| 3.24.1 | | Trustees may decide as a matter of investment policy or of administrative efficiency to purchase annuity policies which are specifically allocated to the provision of benefits for, and which provide all the benefits payable under the scheme to, or in respect of, particular members. These annuity policies are usually in the name of the Trustees and remain assets of the scheme. These transactions are generally referred to as 'buy-ins'. This is because the Trustees are not legally discharged of the corresponding liabilities. | | | |
| 3.24.3 | | Members whose benefits are funded by the purchase of such annuity policies remain members of the scheme and should be included in the scheme's membership statistics. | | | |



| Referer SORP | FRS102 | | Yes | n/a | No |
|-----------------|--------|--|-----|-----|----|
| 3.24.4 | | Bulk buy-ins often have 'true-up' arrangements under which the final terms of the contract are agreed, normally taking into account a data cleanse exercise. If a true-up is in progress at the reporting date, the SORP recommends this is disclosed in the financial statements. | | | |
| | | Buy-outs | | | |
| 3.24.5 | | Trustees may purchase insurance policies in the name of individual beneficiaries, or may assign existing policies in the Trustees' name into the names of individual beneficiaries. These transactions are generally referred to as 'buy-outs'. The Trustees' intention is generally to secure the benefits to those beneficiaries and to secure a legal discharge for the Trustees of the corresponding liabilities. The policies in these circumstances are not, or cease to be, assets of the scheme and cannot be included in the scheme's Statement of Net Assets. The purchase cost of such policies (or the disposal on assignment to members of such policies previously valued in the scheme's Statement of Net Assets) should be accounted for as the 'purchase of annuities' in the Fund Account. | | | |
| 3.24.6 | | The costs should be disclosed under the 'Benefits Payable' caption for immediate annuities and under the 'Payments to and on behalf of leavers' caption for deferred annuities. Members whose benefits have been secured in this way should be treated in the scheme's membership statistics as having exited the scheme. | | | |
| | | (n) Accounting periods | | | |
| 3.6.17 | 3.11 | (i) FRS 102 requires an entity to retain the presentation and classification of items in the financial statements from one period to the next unless there is a change in accounting standards, a change in the entity's operations or a review of its financial statements such that another presentation or classification would be more appropriate. Where change in presentation or classification occurs the scheme should disclose, where practicable: | | | |
| | 3.12 | (a) The nature of the reclassification; | | | |
| | | (b) The amount of each item or class of items that is | | | |
| | | reclassified; and (c) The reason for the reclassification. | | | |
| 3.6.18 | 3.13 | If it is impractical to reclassify comparative amounts, an entity shall disclose why reclassification was not practicable. | | | |
| 3.6.16 | 3.14 | (ii) The financial statements should show comparatives for the previous accounting period for each amount shown in the financial statements, unless otherwise stated in FRS 102 and the SORP. | | | |
| | | (iii) Transitional provisions | | | |
| 3.3.1 | 35 | Transition from reporting under previous UK/Irish GAAP to FRS 102 is required to be carried out in accordance with the requirements of section 35 of FRS 102. These requirements require the first set of financial statements that are prepared in accordance with FRS 102 to be prepared on the basis that FRS 102 always applied to the current and previous accounting periods. There is therefore no need to account for changes in asset recognition or valuation arising on transition to FRS 102 as a prior year adjustment. Full comparatives in accordance with FRS 102's disclosure requirements are required for the comparative period. | | | |



| Referen SORP | FRS102 | | Yes | n/a | No |
|-------------------|--------|--|-----------------|-----|----|
| 3.3.2 | - | FRS 102 requires the following disclosures in relation | | - | - |
| | 35.12 | the transition: An entity shall explain how the transition from its previous financial reporting framework to this FRS affected its reported financial position and financial performance. To comply with FRS 102:35.12, an entit first financial statements prepared using FRS102 sha include: | | | |
| | 35.13 | (a) A description of the nature of each change in accounting policy; | | | |
| | | (b) Reconciliations of its equity determined in accordance with its previous financial reporting framework to its equity determined in accordance with this FRS for both of the following dates: | | | |
| | | (i) The date of transition to FRS102; and | | | |
| | | (ii) The end of the latest period presented in the entity's most recent annual financial statements determined in accordance with its previous finar reporting framework. | | | |
| | | (c) A reconciliation of the profit or loss determined in accordance with its previous financial reporting framework for the latest period in the entity's most recent annual financial statements to its profit or loss determined in accordance with FRS102 for the same period. | | | |
| 3.3.3 | | The SORP recommends that the disclosures required FRS 102 above are satisfied by disclosing a reconcilia between the scheme net assets at the transition date and at the end of the comparative period and the net increase/decrease in the fund during the comparative period as previously stated under UK/Irish GAAP and stated under FRS 102. The transition date is the open date of the comparative period. | tion e as | | |
| 0 5 0 | | (o) Other information | _ | _ | |
| 2.5.3 | | The financial statements should contain any other relevant information. This will include, where material: | | | |
| 3.35.2 | | (i) Capital commitments e.g. unpaid calls on shares. | | | |
| 3.37.2 | 32.2 | Subsequent events FRS 102 requires the amounts recognised in the financial statements to be adjusted for adjusting ever whereas non-adjusting events are not adjusted for bu are disclosed, including the nature of the event and a estimate of its financial effect, or a statement that su an estimate cannot be made. Examples are given: | t n | | |
| 3.37.3, 3.37.4 | | Of adjusting subsequent events (e.g. receipt of m up to date information on the value of investment year end), and Of non-adjusting events (e.g. scheme mergers an major transfers occurring between the reporting of | s at d | | |
| 3.36.1, 3.35.1 | | (iii) Contingencies (other than obligations to pay pensions after the scheme year end) e.g. claims against the scheme or the costs of litigation, or guarantees given | nts). | | |
| 3.36.2, 3.36.3 | 21.13 | security offered by the Trustees. Disclosure should be made of the nature of a conting asset where an inflow of economic benefit is probabl the net asset date. An estimate of the financial effect should be given where practicable. | ent 🗌 e at | | |



| Reference | Reference | | | | | | | | |
|-----------|-----------|--|-----|-----|----|--|--|--|--|
| SORP | FRS102 | | Yes | n/a | No | | | | |
| 3.36.4 | | Recognition of a contingent asset by the Pensions Protection Fund for levy purposes does not necessarily mean that the asset should be included in the scheme's financial statements. | | | | | | | |
| 3.36.5 | | Trustees may have arrangements in place with the employer which provide certainty that the employer can make further deficit funding contributions to the scheme in certain circumstances by making the assets available via a secure arrangement. These arrangements may be in a number of forms including letters of credit, guarantees and escrow financial statements. These arrangements are not disclosed as contingent assets in the financial statements until such time as they represent probable inflows to the scheme. Since this information is generally useful to readers of the annual report to understand the security of scheme funding arrangements are disclosed in the Trustees' Report whether or not they qualify as contingent assets for financial reporting purposes. | | | | | | | |



C Report on actuarial liabilities

| Reference | e: | | | | |
|-----------|--------|---|-----|-----|----|
| SORP | FRS102 | | Yes | n/a | No |
| 2.7.1 | 34.48 | For schemes providing defined benefits, FRS 102 requires a separate report alongside the financial statements on actuarial liabilities. This report contains the latest available valuation of actuarial liabilities and the assumptions and methodology used to calculate them. This will normally be based on the latest available scheme funding valuation and the information contained in the related Summary Funding Statement and Statement of Funding Principles in the United Kingdom. The SORP also recommends that the report discloses the amount of the scheme net assets at the date of the actuarial valuation. | | | |
| 2.7.2 | | The actuarial valuation and the preparation of annual financial statements are discrete exercises. They serve two different purposes. The financial statements are essentially a matter of record of past performance, while the actuarial valuation is a forward-looking exercise, the aim of which is usually to assess funding levels and to recommend contribution rates. The timings of the exercises are different. The actuarial valuation is not required to be carried out annually but rather at least every three years and the effective date of the valuation will not necessarily coincide with the accounting date. The actuarial view of the timing and incidence of scheme liabilities is shaped by the assessment of probabilities of future outcomes using actuarial techniques. | | | |
| 2.7.3 | | If a more recent valuation other than the scheme funding valuation is available this may be used. However, the SORP does not require an annual valuation to be prepared for the purposes of providing the FRS 102 report on liabilities. | | | |



D Actuarial certificate and statement

| Reference | | | | | | | | |
|-----------|--------|--|-----|-----|----|--|--|--|
| SORP | FRS102 | | Yes | n/a | No | | | |
| 2.8.1 | | In the United Kingdom the latest available certificate of the adequacy of the contribution rate is required to be included in the Annual Report under the Disclosure Regulations. The certification of the Schedule of Contributions certifies that the contribution rates are adequate for the purpose of securing that the statutory funding objective can be expected to be met. The certificate is prepared in a format that in the United Kingdom is prescribed by regulations. | | | | | | |





Section 4: Pension scheme financial reporting a way forward?



January 2021

Pension scheme financial reporting - A way forward ABC Pension Scheme

Fund Account

| | Notes | Total | Total |
|---|-------|----------|---------|
| | | 2021 | 2020 |
| | | £'000 | £'000 |
| Contributions receivable: | 4 | | |
| employer | | 6,786 | 66 |
| employee | | 70 | 400 |
| Individual transfers in | | 18 | 7 |
| Other income | | 25 | - |
| | | 6,899 | 473 |
| Benefits payable | 5 | (10,730) | (9,629) |
| Payments to and on account of leavers | | (80) | (106) |
| Other payments | | (38) | (37) |
| Administrative expenses | | (36) | (41) |
| | | (10,884) | (9,813) |
| Net (withdrawals) from dealings with members | | (3,985) | (9,340) |
| Investment income | 6 | 4,587 | 3,574 |
| Change in market value of investments | 8.4 | 7,683 | 536 |
| Investment management expenses | | (378) | (381) |
| Taxation | 7 | (14) | (12) |
| Net return on investments | | 11,878 | 3,717 |
| Net increase/(decrease) in the fund during the year | | 7,893 | (5,623) |
| Net assets of the Scheme at 6 April | | 73,844 | 79,467 |
| Net assets of the Scheme at 5 April | | 81,737 | 73,844 |



Statement of Net Assets (available for benefits)

| At 5 April 2021 | | | |
|---|-------|--------|--------|
| | Notes | 2021 | 2020 |
| | | £'000 | £'000 |
| Investment assets: | 8 | | |
| Equities | | 20,636 | 17,411 |
| Bonds | | 48,306 | 44,224 |
| Property | | 4,700 | 3,844 |
| Pooled investment vehicles | 8.5 | 7,386 | 7,685 |
| Derivatives | 8.6 | 355 | 345 |
| AVC investments | 8.9 | 316 | 260 |
| Cash | | 27 | 26 |
| Other investment balances | 8.8 | 407 | 314 |
| | | 82,133 | 74,109 |
| Investment liabilities: | | | |
| Derivatives | 8.6 | (25) | (13) |
| Other investment balances | 8.8 | (400) | (307) |
| Total investments | | 81,708 | 73,789 |
| Current assets | | 67 | 152 |
| Current liabilities | | (38) | (97) |
| Total net assets of the Scheme at 5 April | | 81,737 | 73,844 |

The notes on pages 88 to 98 form part of these Financial Statements.

The Financial Statements summarise the transactions of the Scheme and deal with the net assets at the disposal of the Trustee. They do not take account of obligations to pay pensions and benefits which fall due after the end of the Scheme year. The actuarial position of the Scheme, which does take account of such obligations, is dealt with in the Report on Actuarial Liabilities included on page [...] and these Financial Statements should be read in conjunction with that Report.

Signed for and on behalf of the Trustee of the ABC Group Pension Scheme on 16 September 2021.

A Rook

B Dane



Notes (Forming part of the financial statements)

1 Basis of preparation

The Financial Statements have been prepared in accordance with Financial Reporting Standard 102 – the Financial Reporting Standard applicable in the UK and Republic of Ireland issued by the Financial Reporting Council and with the guidance set out in the Statement of Recommended Practice (SORP) (revised 2018).

2 Identification of the financial statements

The Scheme is established as a trust under English law. The address for enquiries to the Scheme is included in the Trustee's Report.

3 Core Accounting policies

- i. The accounts are prepared on an accruals basis.
- ii. The functional and presentational currency of the Scheme is Sterling. Balances denominated in foreign currencies are translated into Sterling at the rate ruling at the year end date. Asset and liability balances are translated at the bid and offer rates respectively. Transactions denominated in foreign currencies are translated at the rate ruling at the date of the transaction. Differences arising on investment balance translation are accounted for in the change in market value of investments during the year.

4 Contributions receivable

The Scheme closed to future accrual from 6 April 2020 and normal contributions have therefore ceased. Deficit funding contributions are being paid by the Employer into the Scheme for a period of three years in accordance with a recovery plan in order to improve the Scheme's funding position. The amounts to be paid are: 2021: £6,786,000; 2022: £5,800,000; 2023: £5,800,000.

Accounting policies:

- i. Employee normal contributions are accounted for when deducted from pay, with the exception of contributions deducted from auto-enrolled members during the opt out period which are accounted for on the earlier of receipt or the expiry of the opt out period. Employer normal contributions which are expressed as a rate of salary are accounted for on the same basis as employees' contributions, otherwise they are accounted for in the period they are due under the Schedule of Contributions.
- ii. Employer deficit funding contributions are accounted for on the due dates on which they are payable in accordance with the Schedule of Contributions and Recovery Plan under which they are being paid.

| | 2021 | 2020 |
|------------------------------------|-------|-------|
| | £'000 | £'000 |
| Employer: | | |
| Normal | - | 66 |
| Deficit Funding | 6,786 | - |
| Members: | | |
| Normal | - | 331 |
| Additional Voluntary Contributions | 70 | 69 |
| | 6,856 | 466 |

Employer normal contributions include £nil (2020: £49,000) of contributions payable to the Scheme under salary sacrifice arrangements made available to certain members by the Employer.



Current assets include £50,000 (2020: £40,000) of contributions due from the Employer.

5 Benefits payable

Benefits payable comprise benefits due to Scheme members and their dependents under the Deed and Rules of the Scheme. These comprise mainly monthly pensions and lump sums on retirement. Taxation arising on benefits paid or payable is in respect of members whose benefits exceeded the lifetime or annual allowance and who elected to take lower benefits from the Scheme in exchange for the Scheme settling their tax liability.

Accounting policies:

- i. Benefits are accounted for in the period in which they fall due for payment. Where there is a choice, benefits are accounted for in the period in which the member notifies the Trustee of their decision on the type or amount of benefit to be taken or, if there is no member choice, they are accounted for on the date of retirement or leaving. Benefits taken are reported gross of any tax settled by the scheme on behalf of the member.
- ii. Opt outs are accounted for when the Scheme is notified of the opt out.
- iii. Individual transfers in or out are accounted for when paid or received which is normally when member liability is accepted/discharged.

Benefits payable comprise:

| | 2021 | 2020 |
|--|--------|-------|
| | £′000 | £′000 |
| Pensions | 10,345 | 9,379 |
| Commutations and lump sum retirement benefits | 245 | 250 |
| Purchase of annuities | 45 | - |
| Lump sum death benefits | 75 | - |
| Taxation where lifetime or annual allowance exceeded | 20 | - |
| | 10,730 | 9,629 |

Current liabilities include £25,000 (2020: £35,000) in respect of benefits payable to members.

6 Investment income

Investment income comprises mainly dividends from equities and interest on bonds held directly by the Scheme. Investment income arising from the underlying investments of pooled investment vehicles is rolled up and reinvested within the pooled investment vehicles. This is reflected in the unit price and reported within 'Change in Market Value'. Investment income includes interest bought and sold on bond transactions.

Accounting policies:

- i. Dividends from quoted securities are accounted for when the security is declared ex-div.
- ii. Rents are earned in accordance with the terms of the lease.
- iii. Interest is accrued on a daily basis.
- iv. Investment income is reported net of attributable tax credits but gross of withholding taxes which are accrued in line with the associated investment income. Irrecoverable withholding taxes are reported separately as a tax charge.



Investment income receivable comprises:

| | 2021 | 2020 |
|---------------------------|-------|-------|
| | £'000 | £'000 |
| Dividends from equities | 1,413 | 379 |
| Income from bonds | 3,074 | 3,087 |
| Net rental income | 99 | 107 |
| Interest on cash deposits | 1 | 1 |
| | 4,587 | 3,574 |

Net rental income is stated after deduction of £10,000 (2020: £10,000) of property related expenses.

7 Tax

The ABC Group Pension Scheme is a registered pension scheme for tax purposes under the Finance Act 2004. The Scheme is therefore exempt from taxation except for certain withholding taxes relating to overseas investment income. Tax charges are accrued on the same basis as the investment income to which they relate (see Note 6(iv) above).

8 Investments

8.1 Strategy

The main investment objective of the Scheme is to maintain a portfolio of suitable assets of appropriate liquidity which will generate investment returns to meet, together with future contributions, the benefits payable under the Trust Deed and Rules as they fall due.

The Trustee sets the investment strategy taking into account considerations such as the strength of the Employer covenant, the long term liabilities and the funding agreed with the Employer. The investment strategy is set out in the Statement of Investment Principles (SIP).

The current strategy is to hold broadly:

- 60% in investments that move in line with the long term liabilities of the Scheme. This is referred to as Liability Driven Investment (LDI) and comprises UK and overseas government and corporate bonds and interest rate swaps the purpose of which is to hedge against the impact of interest rate movement on long term liabilities.
- 40% in return seeking investments comprising UK and overseas equities, equity futures, investment property, hedge funds and private equity.
- 15% of the above in overseas currencies. To achieve this the Trustee has put in place a currency hedging strategy using forward foreign exchange rates.

The actual allocations of investments measured at fair value will vary from the above due to market price movements and intervals between rebalancing the portfolio which takes place quarterly. Actual allocations at the Scheme's year end are shown below:

| | 2021 | 2020 |
|----------------------------|------|------|
| | % | % |
| LDI portfolio | 63 | 64 |
| Return Seeking portfolio | 37 | 36 |
| | 100 | 100 |
| Overseas Currency exposure | 17 | 14 |

The Trustee has authorised the use of derivatives by its investment managers for efficient portfolio management purposes as part of its investment strategy for the Scheme.



8.2 Investment risks

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

Market risk: this comprises currency risk, interest rate risk and other price risk.

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

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

The Scheme has exposure to these risks because of the investments it makes to implement its investment strategy. The Trustee manages investment risks, including credit risk and market risk, within agreed risk limits which are set taking into account the Scheme's strategic investment objectives. These investment objectives and risk limits are implemented through the investment management agreements in place with the Scheme's investment managers and monitored by the Trustee by regular reviews of the investment portfolios.

Further information on the Trustee's approach to risk management and the Scheme's exposures to market and credit risks are set out below. This does not include AVC investments, as these are not considered significant in relation to the overall investments of the Scheme.

| A summary of Scheme market risk exposures by strategic asset allocations is set out below: | | | | | | |
|--|--------|--------|-----------------------|------------------|--------------------------|--|
| | 2021 | 2020 | 2020 Market risk | | | |
| | £′000 | £'000 | Interest rate risk | Other price risk | Foreign exchange risk | |
| LDI portfolio | 51,173 | 46,929 | | | | |
| Return seeking portfolio | 30,219 | 26,600 | | | | |
| Total investments | 81,392 | 73,529 | | | | |

a. Market risk



i. Interest rate risk

Interest rate risk arises principally in relation to the LDI Portfolio. The LDI Portfolio comprises investments whose value changes with interest rate changes and is intended to match changes in member liabilities.



ii. Other price risk

Other price risk arises principally in relation to the Scheme's Return Seeking Portfolio. The Scheme manages the exposure to other price risk by constructing a diverse portfolio of investments across various markets.

iii. Currency risk

The Scheme is subject to currency risk because some of the Scheme's investments are held in overseas markets. The Trustee limits overseas currency exposure through a currency hedging policy. At the year end, the unhedged proportion of Scheme net assets held in currencies other than Sterling was 15% (2020: 10%).

b. Credit risk

The Scheme is subject to credit risk as the Scheme invests in bonds, OTC derivatives, has cash balances and enters into repurchase agreements. The Scheme also invests in pooled investment vehicles and is therefore directly exposed to credit risk in relation to the instruments it holds in the pooled investment vehicles and is indirectly exposed to credit risk arising on the financial instruments held by the pooled investment vehicles.

Analysis of direct credit risk

| 2021 | | | | |
|-----------------|---------------------------|-------------------------------|------------------|----------------|
| | Investment grade £'000 | Non-investment grade £′000 | Unrated £′000 | Total £′000 |
| Bonds | 30,500 | 17,806 | - | 48,306 |
| OTC Derivatives | 255 | - | - | 255 |
| Cash | 27 | - | - | 27 |
| Repos | 7 | - | - | 7 |
| PIVs | - | - | 7,386 | 7,386 |
| | 30,789 | 17,806 | 7,386 | 55,981 |

| | Investment grade £'000 | Non-investment grade £'000 | Unrated £′000 | Total £′000 |
|-----------------|---------------------------|-------------------------------|------------------|----------------|
| | 1.000 | 1000 | 1 000 | 1 000 |
| Bonds | 31,548 | 12,676 | - | 44,224 |
| OTC Derivatives | 260 | - | - | 260 |
| Cash | 26 | - | - | 26 |
| Repos | 7 | - | - | 7 |
| PIVs | - | - | 7,685 | 7,685 |
| | 31,841 | 12,676 | 7,685 | 52,202 |

Credit risk arising on bonds held directly or through pooled investment vehicles is mitigated by investing in government bonds where the credit risk is minimal, or corporate bonds which are rated at least investment grade.

Credit risk arising on derivatives depends on whether the derivative is exchange traded or over the counter (OTC). OTC derivative contracts are not guaranteed by any regulated exchange and therefore the Scheme is subject to risk of failure of the counterparty. The credit risk for OTC swaps is reduced by collateral arrangements (see note 8.6 (i)). Credit risk also arises on forward foreign currency contracts. There are no collateral arrangements for these contracts but all counterparties are required to be at least investment grade.

Cash is held within financial institutions which are at least investment grade credit rated.



2020

Credit risk on repurchase agreements is mitigated through collateral arrangements. Included in 'Other Investment Balances' are amounts of £407,000 (2020: £314,000) due from counterparties in relation to reverse repo transactions. £410,000 (2020: £305,000) has been received from counterparties as collateral.

The Scheme's holdings in pooled investment vehicles are unrated. Direct credit risk arising from pooled investment vehicles is mitigated by the underlying assets of the pooled arrangements being ring-fenced from the pooled manager, the regulatory environments in which the pooled managers operate and diversification of investments amongst a number of pooled arrangements. The Trustee carries out due diligence checks on the appointment of new pooled investment managers and on an ongoing basis monitors any changes to the regulatory and operating environment of the pooled managers. An analysis of pooled investment vehicles by type and legal nature is given in note 8.5.

c. Concentration of investment

Scheme investments include the following which represent more than 5% of the total value of the net assets of the Scheme:

| | 2021 | 2020 |
|------------------------------------|-------|-------|
| | £′000 | £'000 |
| Equity funds | 3,824 | 4,358 |
| Representing (of total net assets) | 4.7% | 5.9% |

8.3 Investment Fair Value Hierarchy

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

Level 1: the unadjusted quoted price in an active market for identical assets or liabilities which the entity can access at the measurement date;

Level 2: inputs other than quoted prices included within Level 1 which are observable (i.e. developed using market data) for the asset or liability, either directly or indirectly;

Level 3: inputs which are unobservable (i.e. for which market data is unavailable) for the asset or liability.

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

Investment Fair Value accounting policies:

The approach to fair value determination in accordance with the above hierarchy for the main investment types is:

- i. The majority of listed investments are stated at the bid price at the date of the Statement of Net Assets.
- ii. Fixed interest securities are stated at their clean prices. Accrued income is accounted for within investment income.
- iii. Unquoted securities are included at fair value estimated by the Trustee based on advice from the investment manager.
- iv. Pooled investment vehicles are stated at bid price for funds with bid/offer spreads, or single price where there are no bid/offer spreads as provided by the investment manager.
- v. Properties are included at open market value as at 5 April 2019 determined in accordance with the Royal Institution of Chartered Surveyors' Appraisal and Valuation Standards and the Practice Statement contained therein. The properties have been valued by George and Co Ltd, Chartered Surveyors, who have recent experience in the locations and class of the investment properties held by the Scheme.
- vi. Exchange traded derivatives are valued using market quoted prices.



vii. Over the counter (OTC) derivatives are valued using pricing models and relevant market data as at the year end date.

| | Level (1) | Level (2) | Level (3) | Total |
|----------------------------|-----------|-----------|-----------|--------|
| | £'000 | £′000 | £′000 | £′000 |
| At 5 April 2021 | | | | |
| Equities | 20,636 | - | - | 20,636 |
| Bonds | - | 48,306 | - | 48,306 |
| Property | - | 2,350 | 2,350 | 4,700 |
| Pooled investment vehicles | 2,533 | 4,533 | 320 | 7,386 |
| Derivatives | 75 | 255 | - | 330 |
| AVC investments | 153 | - | 163 | 316 |
| Cash | 27 | - | - | 27 |
| Other investment balances | 7 | - | - | 7 |
| | 23,431 | 55,444 | 2,833 | 81,708 |

The Scheme's investment assets and liabilities fall within the above hierarchy categories as follows:

| | Level (1) | Level (2) | Level (3) | Total |
|----------------------------|-----------|-----------|-----------|--------|
| | £'000 | £′000 | £′000 | £′000 |
| At 5 April 2020 | | | | |
| Equities | 17,411 | - | - | 17,411 |
| Bonds | - | 44,224 | - | 44,224 |
| Property | - | 1,500 | 2,344 | 3,844 |
| Pooled investment vehicles | 2,545 | 4,691 | 449 | 7,685 |
| Derivatives | 72 | 260 | - | 332 |
| AVC investments | 136 | - | 124 | 260 |
| Cash | 26 | - | - | 26 |
| Other investment balances | 7 | - | - | 7 |
| | 20,197 | 50,675 | 2,917 | 73,789 |

8.4 Investment reconciliation

Reconciliation of investments held at the beginning and the end of the year:

| | Value at 6 April 2020 | Purchases at cost and derivative payments | Sales proceeds derivative and receipts | Change in market value | Value at 5 April 2021 |
|----------|--------------------------|--|--|---------------------------|--------------------------|
| | £′000 | £'000 | £'000 | £'000 | £'000 |
| Equities | 17,411 | 36 | (5) | 3,194 | 20,636 |
| Bonds | 44,224 | 387 | (233) | 3,928 | 48,306 |
| Property | 3,844 | - | - | 856 | 4,700 |



| | Value at 6 April 2020 | Purchases at cost and derivative payments | Sales proceeds derivative and receipts | Change in market value | Value at 5 April 2021 |
|----------------------------------|--------------------------|--|--|---------------------------|--------------------------|
| Pooled investment vehicles | 7,685 | 219 | (200) | (318) | 7,386 |
| Derivatives | 332 | 5 | (17) | 10 | 330 |
| AVC investments | 260 | 50 | (7) | 13 | 316 |
| | 73,756 | 697 | (462) | 7,683 | 81,674 |
| Cash deposits | 26 | | | | 27 |
| Other investment balances | 7 | | | | 7 |
| Net investment assets | 73,789 | | | | 81,708 |

Receipts and payments arising from derivative instruments are reported as sale proceeds or purchase of investments.

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

8.5 Pooled Investment Vehicles (PIVs)

Scheme holdings of PIVs comprise:

| | 2021 | 2020 |
|--------------------------|-------|-------|
| | £′000 | £'000 |
| Fixed Interest funds | 2,625 | 2,455 |
| Equity funds | 3,824 | 4,358 |
| Absolute Return fund | 30 | 27 |
| Property funds | 503 | 480 |
| Private Equity funds | 320 | 300 |
| Cash funds | 52 | 34 |
| Diversified Growth funds | 32 | 31 |
| | 7,386 | 7,685 |

The Scheme is the sole investor in the Absolute Return fund. The assets underlying this PIV comprise:

| | 2021 | 2020 |
|----------|-------|-------|
| | £′000 | £′000 |
| Equities | 21 | 19 |
| Bonds | 8 | 7 |
| Other | 1 | 1 |
| | 30 | 27 |

A summary of pooled investment vehicles by type of arrangement is as follows:



| | 2021 | 2020 |
|--|-------|-------|
| | £′000 | £′000 |
| Unit linked insurance contracts | 800 | 750 |
| Authorised unit trusts | 5,965 | 5,860 |
| Open ended investment companies | 363 | 426 |
| Shares of limited liability partnerships | 258 | 649 |
| | 7,386 | 7,685 |

8.6 Derivatives

Derivatives held at the year end comprise:

| Total derivatives | | | | |
|---------------------------------------|-----------------|----------------------|-----------------|----------------------|
| | 2021 | | 2020 | |
| | Assets £′000 | Liabilities £'000 | Assets £′000 | Liabilities £′000 |
| Swaps – LDI portfolio | 252 | (10) | 250 | - |
| Futures – Return Seeking portfolio | 88 | (13) | 80 | (8) |
| FX – Return Seeking portfolio | 15 | (2) | 15 | (5) |
| | 355 | (25) | 345 | (13) |

i. Swaps

The Scheme had derivative contracts outstanding at the year end relating to its LDI fixed interest investment portfolio. These contracts are traded over the counter (OTC). The details are:

| Nature | Nominal amount | Duration | Asset value at year end | Liability value at year end |
|--|----------------|-----------------|----------------------------|--------------------------------|
| | £ | | £ | £ |
| Interest rate swap (Pay 5% for LIBOR) | 10,000,000 | Expires June 21 | 152,000 | - |
| Interest rate swap (Pay 3% for RPI) | 5,000,000 | Expires July 21 | 100,000 | - |
| Interest rate swap (Pay 5% for LIBOR) | 800,000 | Expires Aug 21 | - | (10,000) |
| Total 2021 | 15,800,000 | | 252,000 | (10,000) |
| Total 2020 | 13,600,000 | | 250,000 | - |

Under the OTC interest rate swaps, the counterparties had deposited £250,000 of cash collateral at the year end. This collateral is not reported within the Scheme's net assets.

ii. Futures

The Scheme had exchange traded overseas stock index futures outstanding at the year end relating to its return seeking overseas equity portfolio as follows:



| Nature | Notional Amount | Duration | Asset value at year end | Liability value at year end |
|----------------------------|-----------------|-----------|----------------------------|--------------------------------|
| | £ | | £ | £ |
| Nikkei stock future bought | 368,000 | May 2020 | 88,000 | - |
| Nikkei stock future sold | (10,000) | June 2020 | - | (13,000) |
| Total 2021 | 358,000 | | 88,000 | (13,000) |
| Total 2020 | 225,000 | | 80,000 | (8,000) |

iii. Forward Foreign Exchange (FX)

The Scheme had open FX contracts at the year end relating to its currency hedging strategy as follows:

| Contract | Settlement date | Currency bought | Currency sold | Asset value at Li year end | ability value at year end |
|-------------|-----------------|-----------------|---------------|-------------------------------|------------------------------|
| | | | | £ | £ |
| Forward OTC | One month | £50 | \$100 | 15,000 | - |
| Forward OTC | Three months | £100 | \$200 | - | (2,000) |
| Total 2021 | | | | 15,000 | (2,000) |
| Total 2020 | | | | 15,000 | (5,000) |

8.7 Transaction costs

Included within the purchases and sales are direct transaction costs of £50,000 (2020: £46,000) comprising fees, commissions and stamp duty. These costs are attributable to the key asset classes as follows:

| | | | | 2021 | 2020 |
|------------|-------|------------|------------|--------------|-------|
| | Fees | Commission | Stamp Duty | Total | Total |
| | £′000 | £′000 | £′000 | £'000 | £′000 |
| Equities | 25 | 3 | 1 | 29 | 27 |
| Bonds | 1 | 5 | 10 | 16 | 15 |
| Other | 2 | 1 | 2 | 5 | 4 |
| Total 2021 | 28 | 9 | 13 | 50 | 46 |
| Total 2020 | 23 | 7 | 16 | - | 46 |

Transaction costs are also borne by the Scheme in relation to transactions in pooled investment vehicles. Such costs are taken into account in calculating the bid/offer spread of these investments and are not separately reported.

8.8 Repurchase and reverse repurchase agreements

Under repurchase (repo) arrangements, the Scheme continues to recognise and value the securities that are delivered out as collateral and includes them in the Financial Statements. The cash received is recognised as an asset and the obligation to pay it back is recognised as a liability.

Under reverse repurchase (reverse repo) arrangements, the Scheme does not recognise the collateral securities received as assets in its Financial Statements. The Scheme does recognise the cash delivered to the counterparty as a receivable in the Financial Statements.



At the year end, within other investment assets and liabilities, amounts payable under repurchase agreements amounted to £400,000 (2020: £307,000) and amounts receivable under reverse repurchase agreements amounted to £407,000 (2020:£314,000). At the year end £415,000 of bonds reported in Scheme assets are held by counterparties under repurchase agreements.

8.9 Additional Voluntary Contributions (AVCs)

The Trustee holds assets invested separately from the main fund to secure additional benefits on a money purchase basis for those Scheme members electing to pay AVCs. Members participating in this arrangement each receive an annual statement made up to 5 April confirming the amounts held in their account and the movements in the year. The aggregate amounts of AVC investments are as follows:

| | 2021 £′000 | 2020 £'000 |
|---------------------------------------|---------------|---------------|
| | | |
| Smith Investments Ltd – Unitised fund | 153 | 136 |
| Jones & Jones plc – Unitised fund | 163 | 124 |
| | 316 | 260 |

9 Related party transactions

Contributions received in respect of Trustee Directors who are members of the Scheme have been made in accordance with the Trust Deed and Rules.

All Trustee Directors receive an annual fee for services as Trustee Director of £1,000 (2020: £750).

The Scheme is administered by ABC Group Administration Ltd, an ABC Group company. Fees payable in respect of administration and processing of £21,000 (2020: £21,000) are included within administrative expenses. At the year end creditors include £7,000 (2020: £ nil) in respect of administration expenses payable to ABC Group Administration Ltd.



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