LCC Pension Fund Investment Strategy Statement 2025

Effective: 14 March 2025
Next review: Q1 2026

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1. Introduction and Background

The Local Government Pension Scheme ("LGPS"), of which Leicestershire County Council Pension Fund ("the Fund") is a part, is established under the Superannuation Act 1972 and is regulated by a series of Regulations made under the 1972 Act.

All LGPS funds in England and Wales are required to have an Investment Strategy Statement ("ISS" or "Statement"). This is the Investment Strategy Statement ("ISS") of the Fund, which is administered by Leicestershire County Council, ("the Administering Authority"). The ISS is composed in accordance with Regulation 7 of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 ("the Regulations").

In preparing the ISS the Fund's Local Pension Committee ("the Committee") has consulted with such persons as it considered appropriate. The Committee acts on the delegated authority of the Administering Authority which takes advice from the Fund's external investment consultant.

The previous ISS, which was approved by the Committee on 3rd March 2023, is subject to periodic review at least every three years and without delay after any significant change in investment policy.

The Committee aims to invest, in accordance with the ISS and any other relevant policies, any Fund money that is not needed immediately to make payments from the Fund. The ISS should be read in conjunction with the Fund's latest available Funding Strategy Statement (FSS), and Net Zero Climate Strategy (NZCS).

The remaining parts of this statement will cover the following; policies for investments, asset allocation, risks, and our approach to pooling which will appear in the following order.

- Governance
- Fund Objectives
- Fund Management
- Asset Allocation
- Risks
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- Responsible Investment

2. Governance

Leicestershire County Council, as the administering authority, has delegated responsibility for the management of the Fund to the Local Pension Committee (the Committee). The Committee has responsibility for establishing an investment policy and its ongoing implementation.

Members of the Local Pension Committee have a fiduciary duty to safeguard, above all else, the financial interests of the Fund's beneficiaries. Beneficiaries, in this context, are the members of the Fund who are entitled to benefits (pensioners, previous and current employees) and the employing organisations. Other key stakeholders are the beneficiaries of the employing organisations services, for example local Council tax payers.

Decisions affecting the Fund's investment strategy are taken with appropriate advice from the Fund's FCA (Financial Conduct Authority) regulated external investment advisor. Only persons or organisations with the necessary skills take decisions affecting the Fund. The Members of the Committee receive training as and when deemed appropriate, to enable them to critically evaluate any advice they receive. This is documented within the Fund's Training Policy.

The Chief Financial Officer of Leicestershire County Council has responsibilities under Section 151 of the Local Government Act 1972 and provides financial advice to the Committee, including financial management, issues of compliance with internal regulations and controls, budgeting and accounting.

3. Fund Objectives

The primary objective of the Fund is to provide pension and lump sum benefits as and when they fall due for members or their dependents.

The funding position will be reviewed triennially through an actuarial valuation, or more frequently as required. Payments will be met by employer contributions, resulting from the funding strategy, employee contributions or financial returns from the investment strategy.

The Funding Strategy Statement (FSS) and ISS are therefore inextricably linked. The latest FSS can be found at: https://leicsmss.pensiondetails.co.uk/home/scheme-member/lgps/fund-admin-and-guidance/pension-fund-and-finance

The Committee believes in a long-term investment strategy with regular reviews, usually annually in the form of the asset allocation review. This is with the aim to maximise investment returns of the Fund whilst maintaining an acceptable level of risk.

The Committee sets an investment strategy that focuses on the suitability of investments based on factors including, but is not limited to:

- The level of expected risk versus return

- Outlook for asset returns

- Liquidity and cashflow requirements for the Fund

The Fund has a number of investment beliefs that are taken into account when agreeing an asset allocation policy.

- The long term nature of LGPS liabilities allows for a long term approach to investing.

- Risk premiums exist for certain investments, taking advantage of these can improve investment returns.

- Liabilities influence the asset structure; Funds exist to meet their obligations.

- Markets can be inefficient, and mispriced for long periods of time, therefore there is a place for active and passive investment management.

- Diversification across investment classes with low correlation reduces volatility, but over diversification is both costly and adds little value.

- Responsible investment which incorporates environmental, social and governance (ESG) factors can enhance long term investment performance and investment managers will only be appointed if they integrate responsible investment into their decision-making processes.

- Climate change presents a material risk to financial markets. The Fund supports a transition to a low carbon economy, in line with its ambition to become Net Zero by 2050, or sooner. The Fund will consider the impact of climate change as one of many risks in both its annual review of the strategic asset allocation (SAA) and individual investment decisions.

- The Fund should be flexible enough in its asset allocation policy to take advantage of opportunities that arise from market inefficiencies, and also flexible enough to protect against identifiable short-term risks when this is both practical and cost-effective.

- Investment management costs should be minimized where possible but net investment returns after costs are the most important factor.

4. Fund Management

The Committee aims to structure the Fund in such a manner that, in normal market conditions, all accrued benefits are fully covered by the value of the Fund's assets and that an appropriate level of contributions is set for each employer to meet the cost of future benefits accruing. The Fund considers the employers covenant to meet liabilities. The Fund will work in partnership with these employers where their ability to meet liabilities may be in question in order to protect other Fund employers from the consequences of default.

The Committee has translated its objectives into a suitable strategic asset allocation benchmark for the Fund. This benchmark is consistent with the Committee's views on the appropriate balance between generating a satisfactory long-term return on investments whilst taking account of market volatility and risk and the nature of the Fund's liabilities.

It is intended that the Fund's investment strategy will be reviewed annually. Information available from several sources, including the triennial actuarial valuation, will be used to guide the setting of the investment strategy, however, the strategy does not look to match assets and liabilities in such a way that their values move in a broadly similar manner. Asset / liability matching in this way would lead to employers' contribution rates that are too high to be affordable, so there will inevitably be volatility around the funding level (i.e. to ratio of the Fund's assets to its liabilities).

It is recognised that the maturity profile of the Fund (in terms of the relative proportions of liabilities in respect of pensioners, deferred and active members), together with the level of disclosed surplus or deficit have a role to play in the setting of investment strategy. As the Fund matures it is possible that a more defensive investment strategy will be adopted, whereby a lower level of return is considered an attractive 'trade off' as it should be achieved at a lower level of volatility. These issues do not currently have a material influence on the investment strategy adopted.

In general terms the investment strategy approved will be a blend of asset classes that are diverse enough to dampen some volatility (e.g. if equity markets fall, other assets may rise or fall less significantly), without being so diverse that the strategy becomes unmanageable and costly. Expected long-term returns, levels of volatility and correlation in the performance of different asset classes will all have a role to play in setting the strategy.

By their very nature investment markets are unpredictable and it is impossible to have any certainty around future returns and volatility, so the setting of any investment strategy cannot be more than an imprecise way of arriving at an 'appropriate' split of assets. However, as investment strategy is the biggest driver of future investment returns, it is important that sufficient time is spent in designing and implementing a strategy that is sensible for the Fund.

The Fund's actual allocation is monitored by Fund officers and reported to the Committee on a regular basis with any differences to the SAA explained to ensure actions are in place to remedy the under or over allocation to a specific asset class.

5. Asset Allocation

5.1 Investing in a variety of asset classes

The Fund may invest in quoted and unquoted securities of UK and overseas markets including equities, fixed interest, index linked bonds, cash, property, infrastructure and commodities either directly or through pooled funds. These asset classes are only examples of the types of investments that may be held and are not intended to be an exhaustive list. The Fund may also make use of contracts for difference and other derivatives either directly or in pooled funds investing in these products for efficient portfolio management or to hedge specific risks.

The Committee reviews the nature of Fund investments on a regular basis. The Committee also seeks and considers written advice from the Fund's investment advisor annually when reviewing the strategic asset allocation (SAA) and when reviewing potential investment decisions.

The Fund's SAA is scheduled to be reviewed annually, usually at the January meeting of the Local Pension Committee. The latest and prior year SAA is set out below. As far as is practical and cost-effective, attempts will be made to maintain an actual asset allocation that is close to the target strategy. This will be supported by the Fund's formal rebalancing arrangements which are also set out below. The assessment of the suitability of particular investments is undertaken annually during the strategic asset allocation review conducted by the Fund's external investment advisor. Differences to the SAA targets are reported regularly to the Local Pension Committee alongside actions being taken.

With respect to the rebalance ranges proposed, there are provisions within the rebalancing policy to not rebalance for a variety of reasons which may include not being able to reinvest into another asset class that is outside of its range. This may occur if for example the fund requires time for money to be deployed, there are many asset classes that need time such as private equity, private credit and direct property.

5.2 Framework for rebalancing

	2024 SAA	2025 SAA	2024 SAA rebalance range	Liquidity	Long Term expected volatility
Growth					
Listed Equity - active and passive	37.5%	41.0%		Liquid	High
Targeted Return Funds	5.0%	5.0%		Liquid	Medium
Private Equity	7.5%	7.5%		Illiquid	High
Asset group: growth sub total	50.0%	53.5%	+ / - 2.5%; 51.0% - 56.0%		High
Income					
Infrastructure	12.5%	12.5%		Semi liquid	Medium
Property	10.0%	7.5%		Semi liquid	Medium
Global Credit - private debt	10.5%	9.5%		Illiquid	Low / medium
Global Credit - liquid MAC	9.0%	9.0%		Liquid	Medium
Asset group: income sub total	42.0%	38.5%	+ / - 2%; 36.5% - 40.5%		Medium
Protection					
Inflation linked bonds (ILB)	3.5%	3.5%		Liquid	Low / medium
Investment grade credit (IGC)	3.75%	3.75%		Liquid	Low / medium
Active currency hedge collateral	0.75%	0.75%		n/a	
Asset group: protection sub total	8.0%	8.0%			
Protection sub total exc hedge	7.25%	7.25%	+ / - 1%; 6.25% - 8.25%		Low / medium
Cash	0.0%	0.0%	n/a		

This formalisation and development of a framework will provide greater control over when and how rebalancing decisions are taken. The following ranges have been set as points at which rebalancing should take place.

Asset Group	2025 Strategic Target	Rebalance range
Growth	53.50%	+/- 2.5% (51.0% - 56.0%)
Income	38.50%	+/- 2 (36.5% - 40.5%)
Protection exc hedge	7.25%	+/- 1% (6.25% - 8.25%)

There will be an element of judgement that will be exercised when deciding on rebalancing as not all eventualities can be prepared for. Examples can include extreme market movements in parts of the portfolio that mean rebalancing may not be possible or preferred.

Rebalancing decisions will take place quarterly on receipt of a full fund valuation from the Fund's third party valuation consolidator. However, decisions cannot be made purely on quarter end valuations due to:

a. Not all asset classes are valued regularly, some asset classes, especially private markets will therefore lag the more liquid public market valuations and as such judgement will need to be exercised so as not to rebalance more often than necessary.

b. Rebalancing is not always possible when the underweight or overweight is wholly or partially in illiquid areas of the portfolio. For example, you cannot divest from closed ended private equity funds (illiquid) to reinvest into listed equity quickly. In reality, a fund like the LCCPF with a mature Private Equity portfolio may await distributions from Private Equity investments and reinvest into listed equity if all other areas were also within the rebalancing range.

c. In order to not have to rebalance too regularly officers will consider rebalancing only when the asset classes have a rebalancing variance that is material to their target weight. Re balancing asset classes may be appropriate whilst the asset group is within the SAA rebalance range.

d. Even for liquid assets there is a cost to transitioning positions that has a material impact upon performance.

e. Timing of capital calls and distributions for certain investments is uncertain and therefore requires an element of judgement.

f. Market conditions may delay allocation changes.

Where the variance to the rebalance range (the variance) exists within an asset class that is liquid and can redeployed to an existing manager with little risk, officers may conduct internal due diligence or where economic or market conditions / size of the change dictate request advice from the Fund's investment advisor.

Changes required to rebalance will be agreed by the Director of Corporate Resources following consultation with the Chair of the Local Pension Committee. It is the role of the officers and the Fund's investment advisor to be mindful of liquidity requirements when advising on rebalancing decisions.

Changes will be reported to the next Committee meeting. Where asset groups are outside of rebalance ranges and partial or no action has been taken an explanation will be provided at the next Committee meeting.

5.3 Strategic Asset Allocation returns

The Fund’s current 2025 strategic asset allocation has a median target return 8.4% pa based on the investment advisors 20 year expected returns modelling.

5.4 Restrictions on investment

Restrictions are based on the strategic asset allocation policy which is described in section 5 above.

In line with the Regulations, the Strategy does not permit more than 5% of the total value of all investments of Fund money to be invested in entities which are connected with that authority within the meaning of section 212 of the Local Government and Public Involvement in Health Act 2007.

5.5 Managers

The Committee has appointed a number of investment managers all of whom are authorised under the Financial Services and Markets Act 2000 to undertake investment business. A full list of which is included within the Pension Fund's annual report. The Committee, after seeking appropriate investment advice, has accepted specific benchmarks with each managers investment strategy so that, in aggregate, they are consistent with the overall asset allocation for the Fund.

The Fund's investment managers will hold a mix of investments which reflects their views relative to their respective benchmarks. Within each major market and asset class, the managers will maintain portfolios through direct investment or pooled vehicles.

The managers of the passive funds in which the Fund invests holds a mix of investments within each pooled fund that reflects that of their respective benchmark indices.

5.6 Cash Management Strategy (CMS)

The Investment Sub Committee (ISC) at its meeting in October 2023 approved the Fund's CMS. The Fund does not have a strategic asset allocation target for cash and aims to be fully invested in line with the SAA as approved each year by the Local Pension Committee.

However, due to having a larger than usual cash holding it was deemed appropriate to formalise the CMS for the Fund. It will be reviewed annually in line with other policies the Fund has such as the investment strategy statement (ISS) and funding strategy statement (FSS).

The Fund utilises the experience the administrating authority has within this field and the CMS is based upon the Leicestershire County Council's annual investment strategy as advised by the County Council's treasury advisor Link which incorporates:

a. The management of risk – the Council's investment priorities are security first, portfolio liquidity second and then yield (return).

b. A credit worthiness policy – Link's methodology includes the use of credit ratings from the three main credit rating agencies; Standard & Poor, Fitch and Moody's.

c. Country limits – the Link criteria includes a requirement for the country of domicile of any counterparty to be very highly rated. This is on the basis that it will probably be the national government which will offer financial support to a failing bank, but the country must itself be financially able to afford the support.

The combination of all the factors above produces an acceptable counterparty list, for the County Council, which comprises only very secure financial institutions, and a list that is managed pro-actively as new information is available. The Fund uses a sub-set of the counterparty list as the basis of the Fund's CMS.

Link has a methodology that includes the use of credit ratings. The credit ratings of counterparties are supplemented with the following overlays:

a. "Watches" and "outlooks" from credit rating agencies;

b. Credit Default Swap (CDS) spreads that may give early warning of changes in credit ratings; If a CDS price increases it may be signaling to the market an increase in risk of default.

c. Sovereign ratings to select counterparties from only the most creditworthy countries.

This modelling approach combines credit ratings, and any assigned watches and outlooks, in a weighted scoring system which is then combined with an overlay of CDS spreads. The end-product of this is a series of bands which indicate the relative creditworthiness of counterparties. These are used by the Council to determine the suggested duration for investments. The Council further restricts the list of acceptable counterparties from the base list provided by Link and it is this restricted list that the CMS for the Fund is based on. The CMS will use a smaller list of allowable investments per the table below. Officers for the County Council and Pension Fund are familiar with the allowable list of investments and get regular updates from Link. Any updates that require amendments to investments made by the Fund will be actioned as soon as possible.

Investment	Level of security	Maximum period	Maximum sum invested
Money Market Funds: Low Volatility and constant NAV(2) Triple A rated fund	At least as high as acceptable credit rated banks.	Same day redemptions and subscriptions	£250m (max £50m in each MMF) Minimum use of two MMFs(1) with each MMF having a minimum size of £3bn GBP
Term deposits with credit-rated institutions with maturities up to 1 year (including both ring-fenced and non ring-fenced banks)	Varied acceptable credit ratings, but high security	1 year	£250m(3)
Term deposits with overseas banks domiciled within a single country	Varied acceptable credit ratings, but high security	1 year	£100m(3)

Certificates of Deposit with credit rated institutions with maturities of up to 1 year	Varied acceptable credit ratings, but high security	1 year	£250m
Term deposits with the Debt Management Office	UK Government backed	1 year	£500m
UK Government Treasury Bills	UK Government backed	1 year	£500m
Term Deposits with UK Local Authorities up to 1 year	LA's do not have credit ratings, but high security	1 year	£50m

[1] Limits can be extended higher temporarily by the Director of Corporate Resources and will need to be reported to the next meeting of the Local Pension Committee.

[2]Funds will be invested in constant or low volatility NAV MMFs. Constant NAV MMFs where the capital value of a unit will always be maintained at £1. These funds have to maintain at least 99.5% of their assets in government backed assets. Low volatility NAV MMFs are those where the MMFs are permitted to maintain the unit price at £1 as long as the net asset value does not deviate by more than 0.20% from this level.

[3]Limits for term deposits per counterparty as advised by the treasury advisor will be used up to a total for all term deposits of £350m

6. Risks

The Committee is aware that the Fund has a need to take risk (e.g. investing in growth assets) to help it achieve its funding objectives. Officers, investment consultants and for relevant assets LGPS Central manage, measure, monitor and mitigate the risks as far as possible being taken in order that they remain consistent with the overall level of risk that is acceptable to the Committee. One of the Committee's overarching beliefs is to only take as much investment risk as is necessary.

The overall risk is that the Fund's assets are insufficient to meet its liabilities. The Funding Strategy Statement calculates the value of the Fund's assets and liabilities and with the triennial valuation sets out how any difference in value between assets and liabilities will be addressed.

The principal risks affecting the Fund are set out below. They are grouped into three areas, funding risks, asset risk and other risk. The Fund's approach to managing these three types of risks are explained after each section.

6.1 Funding risks

- Financial mismatch – The risk that Fund assets fail to grow in line with the developing cost of meeting the liabilities.

- Changing demographics – The risk that longevity improves and other demographic factors change, increasing the cost to the Fund of providing benefits.

- Systemic risk – The possibility of an interlinked and simultaneous failure of several asset classes and / or investment managers, possibly compounded by financial contagion, resulting in an increase in the cost of meeting the Fund's liabilities.

6.1.1 How we manage funding risks

The Committee measures and manages financial mismatch in two ways. As indicated above, the Committee has set a strategic asset allocation benchmark for the Fund. This benchmark was set after considering expected future returns from the different asset classes and considers historic levels of volatility of each asset class and their correlation to each other. The Committee assesses risk relative to the strategic benchmark by monitoring the Fund's asset allocation and investment returns relative to the benchmark.

The Committee also seeks to understand the assumptions used in any analysis, so they can be compared to their own views and the level of risks associated with these assumptions to be assessed.

The Committee seeks to mitigate systemic risk through a diversified portfolio, but it is not possible to make specific provision for all possible eventualities that may arise under this heading.

6.2 Asset risks

- Concentration – The risk that a significant allocation to any single asset category and its underperformance relative to expectation would result in difficulties in achieving funding objectives.

- Illiquidity – The risk that the Fund cannot meet its immediate liabilities because it has insufficient liquid assets.

- Currency risk – The risk that the currency of the Fund's assets underperforms relative to Sterling (i.e. the currency of the liabilities).

- Environmental, social and governance ("ESG") – The risk that ESG related factors incorporating climate risk may reduce the Fund's ability to generate the long-term returns.

- Manager underperformance – The failure by the investment managers to achieve the rate of investment return assumed in setting their mandates.

6.2.1 How we manage asset risks

The Fund's strategic asset allocation benchmark invests in a diversified range of asset classes. The Committee has put in place rebalancing arrangements to ensure the Fund's "actual allocation" does not deviate substantially from its target.

The Fund invests in a range of investment mandates each of which has a defined objective, performance benchmark and manager process which, taken in aggregate, help reduce the Fund's asset concentration risk.

The Fund is currently cashflow positive, in that contributions from employees and employers are greater than benefits being paid. The Fund invests across a range of assets, including liquid quoted equities and bonds, as well as property, the Committee has recognised the need for access to liquidity in the short term. Whilst the Fund has a growing proportion of less liquid assets, the Fund has a large proportion of highly traded liquid assets that can be sold readily in normal market conditions so that the Fund can pay immediate liabilities.

The Fund invests in a range of overseas markets which provides a diversified approach to currency markets; the Committee also assess the Fund's currency risk during their risk analysis. This currency risk is managed through a variable currency hedging programme designed to take account of both the risks involved with holding assets that are not denominated in sterling and the perceived value of overseas currencies relative to sterling.

Details of the Fund's approach to managing ESG risks are set out later in this document within section 8.1.

The Committee has considered the risk of underperformance by any single investment manager and have attempted to reduce this risk by appointing multiple investment managers and by having a large proportion of the Fund's equities managed on a passive basis. The Committee assess the investment managers' performance on a regular basis and will take steps, including potentially replacing one or more of the managers, if underperformance persists.

The Committee also recognises that individual managers often have an investment 'style' that may be out-of-sync with market preference for prolonged periods, and that this could lead to lengthy periods of underperformance relative to the relevant benchmark. If the Committee remain convinced by the quality of the investment manager, and the fact that their views remain relevant, underperformance will not necessarily lead to their replacement.

6.3 Other provider risk

- Transition risk - The risk of incurring costs in relation to the transition of assets between managers. When carrying out significant transitions, the Committee seeks suitable professional advice.

- Custody risk - The risk of losing economic rights to Fund assets, when held in custody or when being traded.

- Credit default - The possibility of default of a counterparty in meeting its obligations.
- Stock-lending - The possibility of default and loss of economic rights to Fund assets.

6.3.1 How we manage these other risks

The Committee expects officers to monitor and manage risks in these areas through a process of regular scrutiny of the Fund's investment managers and audit of the operations it conducts for the Fund. In some cases, the Committee will have delegated such monitoring and management of risk to the appointed investment managers as appropriate (e.g. custody risk in relation to pooled funds). The Committee has the power to replace an investment manager should serious concerns exist.

The Fund monitors risks to the Fund, the specific risks are included and set out in the Fund's Funding Strategy Statement.

7. Pooling

Government instigated 'pooling' of pension fund investments in 2015 with the publication of criteria and guidance on pooling of Local Government Pension Scheme assets. Pension funds formed their own groups, and eight asset pools were formed, which are now all operational.

The Fund is a participating scheme in the LGPS Central Pool (Central). The proposed structure and basis on which the LGPS Central Pool operates was set out in the July 2016 submission to Government. The Fund is part of the LGPS Central pool with the objective that the pooled investments can expect to benefit from lower investment costs and the opportunity to access alternative investments on a collective basis. As a local authority-owned and Financial Conduct Authority registered investment manager, the pool company, LGPS Central Limited is required to provide governance, transparency and reporting to give the Fund assurance that its investment instructions are being carried out appropriately.

The LGPS Central Pool consists of the LGPS funds of: Cheshire, Derbyshire, Leicestershire, Nottinghamshire, Shropshire, Staffordshire, West Midlands and Worcestershire.

Collective investment management offers the potential for substantial savings in investment management fees, increased opportunities for investor engagement and access to a shared pool of knowledge and expertise.

The eight administering authorities of the pension funds within the LGPS Central Pool are equal shareholders in LGPS Central Limited. LGPS Central Limited has been established to manage investments on behalf of the Pool and received authorisation from the Financial Conduct Authority in January 2018.

As time has progressed the Fund has 'pooled' significant portion of assets over a number of investment mandates. These investments are reviewed regularly by the Local Pension Committee alongside other investment mandates.

7.1 Assets to be invested in the Pool

The Fund's intention is to invest its assets through the LGPS Central Pool as and when suitable Pool investment solutions become available. LGPS Central has been operating since 1st April 2018.

The Fund transitioned its first assets to Central, as part of the Global Equity Active Multi-Manager Fund, at the end of February 2019. As at December 31 2024 the Fund has invested or committed to invest in fourteen LGPS Central products.

With the Governments Fit for the Future consultation in progress which has proposed pooling of all LGPS funds from each administering authority there is likely to be pooling developments within the next 12 to 24 months across many LGPS funds.

8. Responsible Investing

8.1 Overview and background

Responsible investment is an approach to investment that aims to incorporate environmental including climate risk, social and governance (ESG) factors into investment decisions, to better manage risk and generate sustainable investment returns. It is recognised that ESG factors can influence long term investment performance and the ability to achieve long term sustainable returns. Responsible Investment is a core part of the Fund's approach to investment decisions. The Committee consider the Fund's approach to ESG in two key areas:

- Sustainable investment / environmental and social factors – considering the financial impact of environmental including climate risk, social and governance (ESG) factors on its investments. The Committee has in March 2023 approved the Fund's first NZCS which contains the primary aims for the Fund with respect to formalising a strategy to achieve net zero. The Fund updates achievement against the NZCS goals annually, usually at the last Local Pension Committee meeting each calendar year.

- Stewardship and governance – acting as responsible and active investors/owners, through considered voting of shares, and engaging with investee company management as part of the investment process.

In combination these two matters are often referred to as 'Responsible Investment', or 'RI' and this is the preferred terminology of the Fund.

8.2 Principles for Responsible Investment (PRI)

The Principles for Responsible Investment are recognised as the global standard for responsible investment for investors with fiduciary responsibilities. The Fund declares its support for the PRI and it's 6 principles listed below.

> "*As institutional investors, we have a duty to act in the best long-term interests of our beneficiaries. In this fiduciary role, we believe that environmental, social, and corporate governance (ESG) issues can affect the performance of investment portfolios (to varying degrees across companies, sectors, regions, asset classes and through time).*
>
> *We also recognise that applying these Principles may better align investors with broader objectives of society. Therefore, where consistent with our fiduciary responsibilities, we commit to the following:*
>
> *Principle 1: We will incorporate ESG issues into investment analysis and decision-making processes.*
>
> *Principle 2: We will be active owners and incorporate ESG issues into our ownership policies and practices.*
>
> *Principle 3: We will seek appropriate disclosure on ESG issues by the entities in which we invest.*
>
> *Principle 4: We will promote acceptance and implementation of the Principles within the investment industry.*
>
> *Principle 5: We will work together to enhance our effectiveness in implementing the Principles.*
>
> *Principle 6: We will each report on our activities and progress towards implementing the Principles."*

The Fund is aware of RI duties and ultimately aim to balance its approach with the cost to LGPS employers, who in the main are providing social and environmental services to the local population.

8.3 The Fund's ESG approach

As institutional investors, the Fund has a duty to act in the best long-term interests of its beneficiaries. In this fiduciary role, the Fund believes that environmental, social, and corporate governance (ESG) issues can affect the performance of investment portfolios to varying degrees across companies, sectors, regions, asset classes and through time. The Fund produces an annual RI plan with progress updated at each Committee meeting and ensures the Fund's RI progress. The plan is developed in conjunction with the specialist RI team at LGPS Central.

The Fund believes that it will improve its effectiveness by acting collectively with other likeminded investors because it increases the likelihood that it will be heard by the company, fund manager or other relevant stakeholder compared with acting along. The Fund uses its membership of the Local Authority Pension Fund Forum, alongside LGPS Central to assist it in pursing engagement activities.

The Committee takes RI matters seriously and will not appoint any manager unless they can show evidence that RI considerations are an integral part of their investment decision-making processes. To date, the Fund's approach to RI has largely been to delegate this to their underlying investment managers as part of their overall duties.

The Fund does not exclude investments to pursue boycotts, divestment and sanctions against foreign nations and UK defense industries, other than where formal legal sanctions, embargoes and restrictions have been put in place by the Government.

8.4 Responsible Investing and LGPS central

The Fund's investments that LGPS Central manages and advises upon are subject to Central's Responsible Investment and Engagement (RI and E) Framework. This Framework incorporates the investment beliefs and responsible investment beliefs of the eight funds within the LGPS Central Pool. The RI and E framework can be found at:

https://www.lgpscentral.co.uk/documents/LGPS-Central-RI&E-Framework-2024.pdf

Critical to the framework is Central's Investment and RI beliefs, which the Committee has endorsed and is summarised below:

- Long termism: A long term approach to investment will deliver better returns and the long-term nature of LGPS liabilities allows for a long-term investment horizon.

- Responsible investment: Responsible investment is supportive of risk adjusted returns over the long term, across all asset classes. Responsible investment should be integrated into the investment processes of the Company and its investment managers.

- Climate change: Financial markets could be materially impacted by climate change and by the response of climate policymakers. Responsible investors should proactively manage this risk factor through stewardship activities, using partnerships of likeminded investors where feasible.

- Diversification, risk management and stewardship: Diversification across investments with low correlation improves the risk return profile. A strategy of engagement, rather than exclusion, is more compatible with fiduciary duty and more supportive of responsible investment, because the opportunity to influence companies through stewardship is waived in a divestment approach. Even well diversified portfolios face systematic risk. Systematic risk can be mitigated over the long term through widespread stewardship and industry participation.

- Corporate governance and cognitive diversity: Investee companies and asset managers with robust governance structures should be better positioned to handle the effects of shocks and stresses of future events. There is clear evidence showing that decision making, and performance are improved when company boards and investment teams are composed of cognitively diverse individuals.

- Fees and remuneration: The management fees of investment managers and the remuneration policies of investee companies are of significance for the Company's clients, particularly in a low return environment. Fees and remuneration should be aligned with the long-term interests of our clients, and value for money is more important than the simple minimisation of costs. Contributing to national initiatives that promote fee transparency such as the LGPS Code of Transparency is supportive of this belief.

- Risk and opportunity: Risk premia exist for certain investments; taking advantage of these can help to improve investment returns. There is risk but also opportunity in holding companies that have weak governance of financially material ESG issues. Opportunities can be captured so long as they are aligned with the Company's objectives and strategy, and so long as there is a sufficient evidence base upon which to make an investment decision.

LGPS Central is a signatory to the PRI and as such the Fund's investments via Central will be in line with the principles outlined earlier in this report. In addition, there is a pipeline of Fund transitions to Central, as well as a number of advisory mandates which benefit from Central's RI approach and resource.

It is expected that the Fund's ability to invest in a responsible way will be enhanced through LGPS Central due to the inherent benefits of scale, collectivism and innovation that result from being part of the pool.

To broaden its stewardship activities, LGPS Central appointed EOS at Federated Hermes as its stewardship provider, with the remit of engaging companies on ESG issues and executing the LGPS Central Voting Principles, which have also been approved by the Fund (see below).The funds outside of Central's direct management will be transitioned over a period of years. This could be for an extended period of time, due to the cost implications of a transition. The Fund has access to RI resource and expertise provided by Central which we will assess and help guide the Fund's approach to RI whilst funds are transitioned to Central, further to the below section.

8.5 The exercise of rights (including voting rights) attaching to investments

The Committee has delegated the exercise of voting rights to the investment manager(s) on the basis that voting power will be exercised by them with the objective of preserving and enhancing long term shareholder value.

The instruction of shareholder voting opportunities is an important part of responsible investment. The Fund delegates responsibility for voting to LGPS Central and the Fund's directly appointed investment managers. For Fund assets managed by the former, votes are cast in accordance with LGPS Central's Voting Principles, to which the Fund contributes during the annual review process.

For Fund assets managed by appointed external managers, votes must be cast in line with industry best practice as set out in the accepted governance codes. The managers are strongly encouraged to vote in line with their guidelines in respect of all resolutions at annual and extraordinary general meetings of companies under Regulation 7(2)(f). The results of engagement and voting activities are reported to the Local Pensions Committee on a quarterly basis.

8.6 Climate Change

The Fund believes that climate change presents a material risk to financial markets. For this reason, the Fund takes an evidenced based approach to risks and opportunities posed by climate change.

The Fund has developed a Net Zero Climate Strategy (NZCS) setting out how it intends to manage both the risks and opportunities of climate change, and how it intends to integrate climate change into its broader strategy, asset management and approach to engagement.

The NZCS sets out the Fund's support of a transition to a low carbon economy, in line with its ambition to become Net Zero by 2050, or sooner. The Fund will consider the impact of climate change in both its asset allocation and individual investment decisions.

The NZCS includes targets set in line with the Paris Agreement to achieve Net Zero by 2050, with an ambition for sooner. Delivery and monitoring of these targets are reported annually to the Local Pension Committee. The NZCS is subject to review at least every three years.

Alongside the NZCS the Fund produces annual reports in line with recommendations of the Taskforce on Climate-Related Financial Disclosure (TCFD), which set out recommendations for more effective climate-related disclosures that could promote more informed investment decisions, and, in turn, enable stakeholders to understand better the concentrations of carbon-related assets in the financial sector and the financial system's exposure to climate risk.

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