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Capita

ACNielsen (UK) Pension Plan

Plan Registration Number: 10226893

Trustee's Annual Report and Financial Statements For the Year Ended 5 April 2023

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Contents

Plan Advisers and Principal Employer

Plan Actuary:	S Aries FIA Towers Watson Limited
Independent Auditor:	Grant Thornton UK LLP
Investment Managers:	Towers Watson Investment Management Insight Investment Management (Global) Limited Legal & General Investment Management Limited (DC section) Aviva (DC section) – *ceased 24 June 2022*
Additional Voluntary Contributions (AVC) Providers:	Aviva
Buy-in Provider:	Aviva Baker & McKenzie LLP
Legal Adviser:	Baker & McKenzie LLP
Plan Administrator:	Capita Pension Solutions Limited
Plan Consultants:	Towers Watson Limited (“WTW”)
Investment Custodians:	Northern Trust The Bank of New York Mellon (International) Limited Towers Watson Limited (“WTW”)
Bank:	The Royal Bank of Scotland Plc
Life Assurance Company:	Unum Limited
Principal Employer:	AC Nielsen Company Limited
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Trustee's Report

The Trustee of the ACNielsen (UK) Pension Plan is pleased to present its report together with the financial statements for the year ended 5 April 2023.

The Plan has a defined benefits section and a defined contribution section. The defined benefits section was closed to new entrants on 1 January 2004, except in respect of certain members of the old defined contribution section who remained eligible to transfer to the defined benefits section if relevant criteria were met. The old defined contribution section of the Plan was also closed to new joiners from 1 January 2004. With effect from 1 April 2011 the defined benefits section was changed so that all benefits earned from that date were provided on a "Career Average Revalued Earnings" ("CARE") basis i.e. benefits were based on each year's pay rather than final pay.

The Plan's new defined contribution category (known as "the new Money Purchase Section") was established from 1 January 2005. This section was closed to new joiners and further contributions from existing members with effect from 1 October 2011. All benefits were transferred out of this section to the Fidelity Master Trust on 24 June 2022.

The Plan was closed to the accrual of future benefits with effect from 1 April 2016.

The purchase of a buy-in policy with Aviva in respect of the majority of the Plan's pensioners was completed on 16 December 2022.

Following the completion of the triennial actuarial valuation of the Plan as at 5 April 2021, a new schedule of contributions was put in place covering the period 1 April 2022 to 31 May 2028. This was certified by the Actuary on 29 April 2022.

Plan Management

Under the Occupational Pension Schemes (Member Nominated Trustees and Directors) Regulations 2006, scheme trustees are required to ensure that at least one third of trustees, or directors of a trustee company, is nominated and selected by the members. The Plan meets this requirement. During the year under review the Trustee of the Plan has been ACNielsen (UK) Pension Plan Trust Limited which has six Directors, two of whom are Member Nominated Directors. The Directors during the year under review are as follows:

Richard Cowdrey	Member nominated
Michael Watkins	Member nominated
Robert Clayton	Company appointed
Jocelyn Colyer	Company appointed *(resigned 31 August 2022)*
Independent Trustee Services Limited	Company appointed
Michael Danilovich	Company appointed
Samantha Williams	Company appointed *(appointed 1 October 2022)*

Trustee's Report

Plan Management (continued)

As a result of the Plan closing to the accrual of future benefits with effect from 1 April 2016, the Trustee reviewed the arrangements in place for the nomination and selection of Member Nominated Directors (MNDs) to remove reference to "Active" members. At the same time, the Trustee introduced a new provision to enable an MND to continue in office for a limited period if they cease to be a member of the Plan, subject to the approval of the other Trustee Directors and the Company. This ensures that the Trustee Board and the members continue to benefit from the knowledge and experience gained by an MND rather than the MND immediately having to be replaced.

Further information about the Plan is given in the online explanatory booklet which is available to all members.

Four normal quarterly Trustee meetings were held during the year on 31 May 2022, 13 September 2022, 21 November 2022 and 21 February 2023. A further five additional meetings were held during the year in respect of the transfer of the New Money Purchase Section to the Fidelity Master Trust, and the pensioner buy-in with Aviva.

Principal Employer

The Principal Employer is A.C. Nielsen Company Limited whose registered address is Nielsen House, John Smith Drive, Oxford, OX4 2WB.

Governance and Risk Management

The Trustee has in place a risk register which it uses to evaluate and manage the risks associated with managing the Plan. The Trustee also produced a business plan for the Plan year which sets out the objectives and aims of the Trustee for the year.

The Pensions Regulator has responsibility for the promotion of high governance standards in trust-based defined contribution (DC) schemes. Due to the impact of automatic enrolment and its increased focus on raising DC standards on governance and administration, the Regulator has introduced a governance statement which it expects trustees to complete to demonstrate that they have complied with the DC code and regulatory guidance.

The Trustee Directors of the ACNielsen (UK) Pension Plan Trust Limited confirm that the systems, processes and controls across key governance functions are consistent with those set out in:

- Code of practice 13: Governance and administration of occupational trust-based schemes providing money purchase benefits, and
- Regulatory guidance for defined contribution schemes.

These are underpinned by the DC quality features.

Based on the Trustee's assessment, and subject to the explanations set out below, the Trustee believes that it has adopted the standards of practice set out in the DC code and DC regulatory guidance.

- Where the Trustee has adopted a different approach to that set out in the DC code and DC regulatory guidance, the reason for this is explained in the governance checklist.
- Where the Trustee does not have systems and processes in place to demonstrate particular features, it has explained why in the governance checklist.
- Where the Trustee is seeking to achieve or maintain 'best practice' level, this is explained in the governance checklist.

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Trustee's Report

Plan Management (continued)

Financial developments

The financial statements on pages 49 to 66 have been prepared and audited in accordance with the Regulations made under Sections 41 (1) and (6) of the Pensions Act 1995. They show that the net assets of the fund decreased from £299,037,765 at 5 April 2022 to £226,551,463 at 5 April 2023.

The most recent actuarial valuation of the Plan was carried out as at 5 April 2021. Further details from the valuation are included in the Actuarial Certificates on pages 42 and 43 of the Annual Report.

GMP Equalisation

As disclosed in note 24, the Trustees do not consider there will be a material impact on the financial statements of potential liabilities that may arise in respect of amendments required to equalise pension benefits for men and women in relation to guaranteed minimum pension benefits. The Trustees continue to monitor the issue as, under a legal ruling dated 26 October 2018, the Plan will be required to backdate benefit adjustments in relation to GMP equalisation and provide interest thereon. A GMP sub-committee was established during the Plan year ending 5 April 2020 to consider the actions required in relation to the reconciliation, rectification and equalisation of GMPs under the Plan and to make appropriate recommendations to the Trustee with regard to any decisions required. As part of the 2021 Actuarial Valuation, the Plan Actuary considered the impact that GMP equalisation will have on the Plan's liabilities; initial indications are that liabilities will increase by around 1%.

A supplemental judgement has been issued regarding the impact of GMP equalisation on historic transfers out. The Trustee is aware that the issue will affect historic transfers made from the Plan and is working with its advisers and administrators to identify the impacted transfers and consider the next steps.

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Trustee's Report

Plan Management (continued)

Membership

Details of the current membership of the Plan are given below:

	CARE Section	Defined Contribution Section	Total 5 April 2023
Pensioners			
Pensioners at start of year	829	-	829
Adjustment*	(2)	-	(2)
Members with deferred benefits retiring	43	-	43
Spouses and children who started receiving pensions	2	-	2
Pensioners who died	(23)	-	(23)
Pensioners at end of year	**849**	**-**	**849**
Members with deferred benefits			
Members with deferred benefits at start of year	640	709	1,349
Adjustments*	(14)	4	(10)
Deferred members becoming pensioners	(43)	-	(43)
Transfers out	(2)	(5)	(7)
Group transfers out	-	(242)	(242)
Deaths	-	(2)	(2)
Commutation of benefits	(1)	-	(1)
Members with deferred benefits at end of year	**580**	**464**	**1,044**
Total membership at end of year	**1,429**	**464**	**1,893**

***** In respect of late update of database where status changes occurred between 6 April 2022 and 5 April 2023

Pensioners include individuals receiving a pension upon the death of their spouse. Included within the pensioner numbers are 4 members who receive pensions secured by annuity policies held in the name of the trustee (2022: 4).

Summary of Contributions

During the year ended 5 April 2023, the contributions payable to the Plan by the Employer were as follows:

	Defined Benefit Section £	Defined Contribution Section £	5 April 2023 Total £
Contributions from employer:			
Deficit funding	3,671,472	-	3,671,472
Additional	1,480,000	-	1,480,000
Contributions payable under the Schedules (as reported by the Plan Auditor) and reported in the financial statements	**5,151,472**	**-**	**5,151,472**

Trustee's Report

Investment Matters

Overview

The Trustee, with the assistance of its appointed investment adviser, determines the overall investment strategy for the Plan and sets out the broad policy to be adopted by each of the appointed fund managers.

Investment managers

The names of those who have managed the Plan's investments during the year are listed on page 2. The Trustee has delegated the day-to-day management of investment to its appointed fund managers. A written agreement between the Trustee and each manager sets out the terms on which the manager will act.

The managers' duties include the consideration of social, environmental or ethical issues in the selection, retention and realisation of investments as well as voting and corporate governance in relation to the Plan's assets. The Trustee has reviewed each of the investment managers' policies on these issues. The Trustee believes that the policies adopted by the managers are consistent with their own views.

Investment principles

In accordance with Section 35 of the Pensions Act 1995, the Trustee has prepared a Statement of Investment Principles which includes the Trustee's policy relating to ethical investment and the exercise of the rights attaching to investments. Any member may request a copy. This Statement may change from time to time according to advice received from the investment manager or consultants.

Departures from investment principles

To the best of its knowledge, the Trustee can report that there has not been any departure from the SIP by the Plan's investment managers during the year ended 5 April 2023.

Custodial arrangement

The assets are invested in pooled investment vehicles; the investment managers have the responsibility for selecting and monitoring the custodians. The custodians in respect of the DB section investments, as at the year-end, are shown below:

Manager	**Custodian**
WTW	Bank of New York Mellon
Insight Investment	Northern Trust

Custody for the DC section investments is covered by the investment managers who make their own arrangements for custody of the underlying investments.

Employer-related investments

There were no employer-related investments at any time during the year.

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Trustee's Report

Investment Matters (continued)

Asset allocation

The allocation of the Plan's Final Salary Section assets as at 5 April 2023, along with the Plan's benchmark allocation, is given in the table below:

Asset class	Plan weight (%)	Benchmark weight (%)	Difference (%)
Multi-asset funds (return-seeking assets)	17.8	13.6	4.2
Downside Risk Hedge	1.1	0.1	1.0
LDI & cash (matching assets)	40.8	49.3	-8.5
Buy-in	40.3	37.0	3.3
	100.0	100.0	0.0

Source: State Street Global Services Performance Services

As at 5 April 2023, the Plan's asset allocation was approximately 17.8% invested in return-seeking assets, 1.1% in the Downside Risk Hedge, 40.8% invested in matching assets (liability driven investments (LDI) and cash) and 40.3% invested in a buy-in transaction. The benchmark allocation for the Plan was documented in the latest SIP, this target allocation is as at March 2023.

In relation to the Old Money Purchase Section, member's assets are invested in the ACNielsen LGIM Lifestyle Strategy. This initially invests entirely in the LGIM Global Equity Market Weights (30:70) Index Fund until the member reaches age 60, at which point investment gradually switches to the LGIM Future World Inflation Linked Annuity Aware Fund (previously known as the LGIM Pre-Retirement Inflation Linked Fund) so that by the time the member reaches age 65, they are entirely invested in this Fund.

Review of investment performance

Towers Watson Investment Management and Insight Investment managed the Plan's DB Section assets throughout the year to 31 March 2023. The table below compares the Plan return against the benchmark return since the inception of the fiduciary portfolio.

Period to 31 March 2023	Plan (% pa)	Benchmark (% pa)
Q1 2023	3.9	3.4
1 year	26.7	25.5
Since inception (Sept 2016)	-1.15	-3.6

Source: State Street Global Services Performance Services

Legal & General Investment Management managed all of the Plan's Old Money Purchase Section assets over the period. The table below compares the Plan's gross of charges return against the benchmark return for periods to 31 March 2023:

Period to 31 March 2023	Plan (% pa)	Benchmark (% pa)
1 year performance		
LGIM Global Equity Market Weights (30:70) Index Fund – 75% Currency Hedged	-2.64	-2.62
LGIM Future World Inflation Linked Annuity Aware Fund *	-25.81	-22.45
3 year performance		
LGIM Global Equity Market Weights (30:70) Index Fund – 75% Currency Hedged	15.16	15.16
LGIM Future World Inflation Linked Annuity Aware Fund *	-8.49	-5.91

Source: Legal & General Investment Management

* The LGIM Future World Inflation Linked Annuity Aware Fund was previously named the LGIM Pre-Retirement Inflation Linked Fund.

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Trustee's Report

Investment Matters (continued)

Review of investment performance (continued)

Aviva managed all of the Plan's New Money Purchase Section assets until this Section was closed following the transfer to Fidelity Master Trust on 22 June 2022. In addition, it managed some AVC assets for the Final Salary Section, which remain in situ within the Plan. The table below compares each fund's return (gross of fees) against the relevant benchmark return for periods to 31 March 2023:

Period to 31 March 2023	**1 year (%)**	**3 years (% pa)**
Aviva BlackRock (30:70) Currency Hedged Global Equity (Aquila HP)	**-4.89**	**14.51**
Aviva BlackRock (30:70) Global Equity Index bespoke benchmark	*-3.24*	*15.24*
Aviva BlackRock Over 15 Year Corporate Bond Index (Aquila HP)	**-23.38**	**-8.67**
ICE BofA 15+ Year Sterling Non-Gilt (S)	*-22.45*	*-8.03*
Aviva BlackRock UK Equity Index (Aquila HP)	**2.55**	**14.15**
FTSE All Share (Midday)*	*2.36*	*14.23*
Aviva BlackRock Over 5 Year Index-Linked Gilt Index (Aquila HP)	**-29.62**	**-10.27**
FTSE Actuaries UK Index-Linked Over 5 Yrs	*-29.47*	*-10.36*
Aviva BlackRock World (Ex-UK) Equity Index (Aquila HP)	**-3.22**	**16.01**
FTSE Developed Ex UK	*-3.47*	*16.04*
Aviva BlackRock Over 15 Year Gilt Index (Aquila HP)	**-29.81**	**-16.53**
FTSE Actuaries UK Conventional Gilts Over 15 Yrs	*-29.87*	*-16.72*
Aviva Stewardship NGP	**1.99**	**11.64**
*FTSE All Share**	*2.92*	*13.81*
Aviva Cash NGP	**2.25**	**0.84**
SONIA	*2.24*	*0.74*

Source: Morningstar

* Different FTSE All Share data is provided – this is because the Aviva BlackRock UK Equity Fund and the Aviva Stewardship Fund are priced at different points and so the benchmark performance is set to these different points.

Market Update

The Bank of England (BoE) have made a number of incremental base rate rises throughout the 12 months to March 2023.

- In May and June 2022, the BoE raised interest rates by 0.25% to take the base rate to 1.25.
- An increase in the base rate by 0.5% in two consecutive months (August and September) to take the base rate to 2.25%.
- An increase in the base rate by 0.75% in November, the biggest rise for three decades, in a bid to combat soaring inflation.
- A further increase of 0.50% in December took the base rate to a 14 year high of 3.50% with a warning that further tightening of monetary policy was likely.
- The BoE continued to raise interest rates in the first quarter of 2023 with increases of 0.5% and 0.25% in February and March respectively. This took the base rate to a 15 year high of 4.25%.

Trustee's Report

Investment Matters (continued)

Market Update (continued)

UK inflation rate, as measured by the CPI, rose by 10.1% in the 12 months to March 2023, down from 10.4% in February and from a recent peak of 11.1% in October 2022. Although fuel prices fell, further sharp rises in the costs of food, recreation and culture left the index higher than the anticipated drop to 9.8%. Food prices alone rose 19.1% in the 12 months to March 2023.

In the US, over Q2 2022, the Federal Reserve (the Fed) raised rates by 0.5% in May and then by 0.75% in June 2022, bringing to the target range to 1.50-1.75%. The Fed further raised the federal funds rate by 0.75% in July and September, bringing the target range to 3.0-3.25%, and then again by 0.75% in November and a further 0.50% in December, bringing the target range to a high of 4.25-4.50%. Over Q1 2023, the Federal Reserve lifted the federal funds rate by 0.25% in February and again by 0.25% in March, bringing the target range to a high of 4.75 – 5.00% since it began in December 2008. In a strong signal that the US central bank is nearly done with rate increases, they followed the latest increase by saying "some additional policy firming may be appropriate" to bring inflation back to the banks 2% target.

Over the 12 months to 31 March 2023 sterling has depreciated against the US dollar and the euro by 6.1% and 3.8% respectively. The sterling appreciated against the Yen by 3.0%.

Equity markets

Over the 12 months to 31 March 2023, equity markets returned negative performance across North America, Developed Asia Pacific (ex Japan) and Emerging Markets but was positive in other regions. The FTSE All World Index returned -0.7% whilst the FTSE Emerging Index returned -3.9% (both in sterling terms). FTSE All-Share Index returned 2.9% whilst Developed Europe (ex UK) was the best performing region with 8.5% (both in sterling terms).

Bond markets

UK government bond yields (which move inversely to bond price) increased over 12 months to 31 March 2023. Long maturity UK gilts have returned -29.7% over the period (as measured by FTSE-A Gilts Over 15 Years Index) and UK gilts all stocks returned -16.3%.

Inflation-linked gilt yields also increased over the 12-month period. Long maturity UK index-linked gilts returned -39.1% (as measured by FTSE-A Index-Linked Gilts Over 15 Years Index) and UK index-linked gilts all stocks returned -26.7%.

Over the past year, local currency emerging market debt outperformed hard currency emerging market debt returning 5.7% and -8.7% respectively.

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Trustee’s Report

Investment Matters (continued)

Market Update (continued)

Alternative investment markets

Over Q2 2022, the price of Brent crude oil continued to fall at the start of the quarter, reaching a low of US$96 in early April 2022. This was due to continued concerns over global economic recession, and concerns over strict lockdowns in China as it faced the worse outbreak of COVID since the pandemic began. Oil prices steadily increased from mid-April 2022 onwards (primarily because of supply concerns of Russian oil) reaching a peak of US$122 per barrel in early June 2022, before falling back to US$106 per barrel at the end of Q2 2022. Oil prices fell throughout the third quarter of 2022, reaching a low of US$76.7 in late September, due to OPECs agreement to boost production by 648,000 bpd (Barrels per day) in August and continuing concerns over global economic recession occurring. Oil prices fluctuated throughout the fourth quarter, peaking at US$92.6 in early October and dropping to US$71.0 in early December. 2022 was one of the most volatile periods ever seen in the energy markets. Russia’s invasion of Ukraine was the primary reason for prices rising above US$120 but this has been counteracted by the year end by growing US production and a massive release of oil from the Strategic Petroleum Reserve. Oil prices fluctuated throughout the first quarter, peaking at US$81.6 in late January and dropping to US$66.7 in mid-March. The collapse of Silicon Valley Bank and the forced takeover of Credit Suisse by UBS sparked fears of another banking crisis and a significant drop-off in demand for crude oil.

Commercial UK property (as measured by the IPD Monthly Index) has returned -14.9% over the 12 months to 31 March 2023.

Global Commodity Futures, as measured by S&P Goldman Sachs Commodity Index, returned -4.2% over the 12 months to 31 March 2023 in sterling terms.

Investment risk disclosures

Investment risks are disclosed in note 19 to the Financial Statements.

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Trustee's Report

DC Governance Statement

This statement has been prepared in accordance with Regulation 23 of the Occupational Pension Schemes (Scheme Administration) Regulations 1996 (the "Administration Regulations"). It describes how the Trustee has met the statutory governance standards applicable to the ACNielsen (UK) Pension Plan ('the Plan') in relation to:

- The investment options in which members' funds are invested (this means the "default arrangement" and other funds members can select or have assets in, such as self-select or "legacy" funds)
- Net investment returns
- Requirements for processing core financial transactions
- Assessment of charges and transaction costs
- An illustration of the cumulative effect of these costs and charges
- Value for members
- The requirement for trustee's knowledge and understanding (TKU)

The statement relates to the reporting period between 6 April 2022 and 5 April 2023. It has been prepared in accordance with relevant statutory guidance.

The Plan's defined contribution arrangements, which are under the remit of this statement, are as follows:

- The old Money Purchase section (also known as 'Section A'), which was closed to new joiners on 1 January 2004. This section was closed to new contributions on 1 April 2016. Members are invested in the ACNielsen Lifestyle strategy invested in Legal & General Investment Management (LGIM) funds; and
- The Additional Voluntary Contribution (AVC) arrangement within the Defined Benefit section of the Plan was open to contributions at the same time as Section A was open. The AVC arrangement is held with Aviva.

The new Money Purchase section (also known as 'Section C'), was fully closed on 20 June 2022 when members were transferred from Aviva to the Fidelity Master Trust.

Default arrangement

For the purposes of the Occupational Pension Schemes (Charges and Governance) Regulations 2015 ('the Charges and Governance Regulations'), as at 5 April 2023 the Plan's "default arrangement" was the ACNielsen Lifestyle strategy.

The ACNielsen Lifestyle strategy is the only available investment option within the old Money Purchase section of the Plan ('Section A'). The ACNielsen Lifestyle strategy is made up of two LGIM investment funds, and invests in the LGIM Global Equity Market Weights (30:70) Index Fund – 75% Currency Hedged, until five years before the member's 65th birthday when the funds are gradually switched into the LGIM Future World Inflation Linked Annuity Aware Fund (previously referred to as the LGIM Pre-Retirement Inflation Linked Fund).

No sections of the Plan are used as a qualifying scheme for automatic enrolment purposes.

Trustee’s Report

DC Governance Statement (continued)

Statement of investment principles

Appended to this statement is a copy of the Plan’s latest Statement of Investment Principles (“SIP”) governing decisions about investments for the purposes of the default arrangements, prepared in accordance with legislation. A copy of the Plan’s SIP is also available to view at the following website: https://www.acnielsenpensionplan.co.uk/. This existence of the SIP, and its availability for viewing, is drawn to the attention of members in their annual benefit statement.

The objective specifically relevant to the default arrangement is to provide capital growth for members over the long term and then de-risk into annuity-targeting funds that provide greater protection against volatility as members approach retirement, in expectation that the majority or all of the Section’s benefits will be required to purchase an annuity through the Defined Benefit (DB) section.

Review of the default arrangement

The last review of the default arrangement took place in May 2022, where the Trustee considered whether the objective of the default arrangement was still being met. The review included an analysis of Section A member data provided from the last actuarial valuation, along with the review of the two component funds of the ACNielsen Lifestyle Strategy.

The Trustee found that:

- Around 80% of Section A members would need to use their entire fund to purchase an annuity, with the remaining 20% needing to use a portion of their fund towards the required annuity. This means the objective for the default arrangement remains appropriate.
- The structure of the lifestyle strategy should still target annuity purchase at retirement and remains appropriate.
- The Trustee also found that the default’s overall risk profile was appropriate, taking into account the DB guarantee that underpins these benefits.

In conjunction with its advisers, and based on the above points, the Trustee decided to not make a change following the review. However, further discussions about the future of this Section were undertaken during the reporting period. In particular, the Trustee is currently considering whether the component fund used in the growth stage of the default remains suitable and the outcome of that ongoing review is expected during Q4 2023.

The next reporting period for the default investment review, if necessary, will be 2025/2026.

Net investment returns

The Trustee can confirm it has taken account of the DWP’s Statutory Guidance on net investment reporting. The Trustee is required to report on the net investment returns for the default arrangements and for all self-select funds during the Plan year. The net investment return is after all transaction costs and charges.

Fund - LGIM	Last 12 months	Last 3 years (p.a.)	Last 5 years (p.a.)
LGIM Global Equity Market Weights 30:70 Index 75% Currency Hedged	-2.84%	14.93%	7.23%
LGIM Future World Inflation Linked Annuity Aware	-25.85%	-8.53%	-2.21%

Trustee's Report

DC Governance Statement (continued)

ACN Lifestyle strategy	Age	Last 12 months	Last 3 years (p.a.)	Last 5 years (p.a.)
	25	10.77%	11.12%	9.12%
	45	10.77%	11.12%	9.12%
	60*	8.42%	5.97%	3.57%

** Age 60 has been used to account for the impact of the 5 year lifecycle glidepath for Section A members.*

Fund - Aviva	Last 12 months	Last 5 years (p.a.)	Last 10 years (p.a.)
Aviva BlackRock 30:70 Currency Hedged Global Equity Index	-5.34%	6.44%	7.74%
Aviva BlackRock Over 15 Year Corporate Bond Index	-23.75%	-4.02%	1.25%
Aviva BlackRock Over 15 Year Gilt Index	-30.15%	-6.76%	0.06%
Aviva BlackRock Over 5 Year Index-Linked Gilt Index	-29.95%	-4.29%	1.27%
Aviva BlackRock UK Equity Index	2.06%	4.76%	5.3.7%
Aviva BlackRock World (Ex UK) Equity Index	-3.69%	10.86%	11.24%
Aviva Cash	1.76%	0.31%	0.10%
Aviva Stewardship	1.50%	5.11%	6.06%

Aviva investment strategy	Age	Last 12 months	Last 5 years (p.a.)	Last 10 years (p.a.)
5 Year Cash Lifetime Investment Programme	25	-5.34%	14.79%	7.74%
	45	-5.34%	14.79%	7.74%
	55	-5.34%	14.79%	7.74%

Aviva notes: The charges assumed are those currently applicable to a single contribution of £10,000 paid into your scheme at the beginning of the reporting period. Returns are annualised geometric means over the time periods displayed. For age specific returns, a normal retirement age of 65 has been used

Trustee's Report

DC Governance Statement (continued)

Processing financial transactions

The Trustee has a specific duty to ensure that core financial transactions relating to the Plan are processed promptly and accurately and must describe to members how this obligation is met. The Trustee has appointed Capita to provide administration services for the Plan. The Trustee has received assurance from Capita and has taken steps to try and ensure that there are adequate internal controls to ensure that core financial transactions relating to the Plan were processed promptly and accurately during the reporting period.

Within Capita, the Plan has a dedicated administration team and all administration tasks are logged and automatically monitored by a workflow system that is managed by a senior member of the dedicated team. Aviva is the pension provider for Section C and the AVC arrangement.

Core financial transactions are identified and prioritised, for example, investment and banking transactions are checked and fully reconciled. For this purpose, 'Core financial transactions' includes (but is not limited to):

- Investment of contributions in the scheme (although this is no longer relevant under the Plan)
- Transfers of assets relating to members into and out of the Plan
- Transfers of assets relating to members between different investments within the Plan, and
- Payments from the Plan to, or in respect of members.

The Trustee has a Service Level Agreement (SLA) in place which covers the accuracy and timeliness of all core financial transactions.

Regular quarterly reporting is received from Capita, including performance against the service level agreements (SLAs) that are in place. The average SLA over the reporting period was 91.2%. (This data included the DB section). Any complaints or issues that arise are referred to the Trustee as and when they arise. The Administration Sub-committee (composed of two Trustee Directors and a representative from the Capita administration team) holds monthly meetings to consider administration complaints or issues. There were generally no issues which arose within the reporting period in relation to core financial transactions. Capita's Finance team monitors the bank accounts daily and all investment and banking transactions are checked and sanctioned separately before they are actioned.

Capita informed the Trustee that, in the Plan Year, it suffered a cyber incident from 22 March 2023 to 31 March 2023. Capita has carried out a forensic review of the incident. The full findings of Capita's review, including which members if any were affected, is awaited. The data breach has been reported to the Information Commissioner's Office and the Pensions Regulator by Capita and the Trustees. A third-party review of Capita's forensic investigation of the incident is underway.

No other breaches/exceptions have been reported for the Plan Year.

Aviva's SLAs are 5 working days. Aviva proactively monitors customer experience via research and feedback across its platform, however it also appreciates the significance of SLAs and 'end-to-end' reporting to demonstrate performance. During the reporting period, Aviva's core financial transactions in relation to the AVC arrangement had an SLA of 100%, relating to only one task. WTW benchmarks Aviva's administration performance against the rest of the bundled provider market to support the Trustee in its view of Aviva. WTW found that Aviva had completed 99% of its tasks within SLA during the 2023 governance period.

The Plan's accounts are also audited annually by Grant Thornton UK LLP.

Trustee's Report

DC Governance Statement (continued)

The latest common data review took place in 2022. A data cleaning exercise is due to take place in the next reporting period; while this relates predominantly to the defined benefit section data, the checks will incorporate DC member data. An update on this exercise will be provided in the next Statement.

During the reporting period there were no material administration errors, therefore, the Trustee is satisfied that the Plan's core financial transactions have been processed promptly and accurately during the 6 April 2021 to 5 April 2022 governance period.

Charges and transaction costs

In accordance with regulation 25(1)(a) of the Administration Regulations, the Trustee calculated the "charges" borne by members of the Plan for the 2023 governance period, and considered whether it could obtain "transaction costs".

For these purposes:

- "transaction costs" means the costs incurred as a result of the buying, selling, lending or borrowing of investments.
- "charges" means, broadly, administration charges other than:
  - transaction costs;
  - costs the court determines the Trustee can recover;
  - certain pension sharing on divorce costs;
  - winding-up costs; and
  - costs solely associated with the provision of death benefits.

Charges - Section A

During the Plan year, there were no charges applicable to the default arrangements that were borne by members. The fund charges (which includes the cost of investment and administration) for the ACNielsen Lifestyle Strategy are met by the Plan. The default arrangement is set up as a Lifestyle strategy, which means that members' assets are automatically moved between different investment funds as they approach their target retirement date. This means the level of transaction costs will vary depending on how close members are to their target retirement date. For the reporting period covered by this statement, the transaction costs are set out in the table below.

Fund name	**Total fund charges (pa)**	**Transaction costs ***
LGIM Global Equity Market Weights 30:70 Index 75% Currency Hedged	0.00%	0.00%
LGIM Pre-Retirement Inflation Linked	0.00%	0.00%

Trustee’s Report

DC Governance Statement (continued)

Charges - Section B AVCs and Section C

The fund charges for the remaining money purchase funds within the Plan (of which none are default arrangements) are shown below. The Aviva funds have an Annual Management Charge of 0.48% pa; where the total fund charge is higher, the difference is in respect of any Additional Expenses.

Fund name	**Total fund charges (pa)**	**Transaction costs****
Aviva BlackRock 30:70 Currency Hedged Global Equity Index	0.48%	0.134%
Aviva BlackRock Over 15 Year Corporate Bond Index	0.48%	0.211%
Aviva BlackRock Over 15 Year Gilt Index	0.48%	0.018%
Aviva BlackRock Over 5 Year Index-Linked Gilt Index	0.48%	0.026%
Aviva BlackRock UK Equity Index	0.48%	0.100%
Aviva BlackRock World (Ex UK) Equity Index	0.48%	0.038%
Aviva Cash	0.48%	0.001%
Aviva Stewardship	0.48%	0.078%

* LGIM has provided transaction costs incurred by members at a fund level (based on the fund values at 31 March 2023). LGIM has calculated the transaction costs as the average cost incurred over the last financial year (1 April 2022 to 31 March 2023) as a necessary part of buying and selling each of the fund’s underlying investments in order to achieve the investment objective.

** Transaction costs in the Aviva fund range is calculated using the slippage cost methodology except for the Cash fund.

The Trustee confirms that, taking account of the charges applicable and circumstances of the Plan, the funds made available to members during the year were suitable.

Transaction costs

Transaction costs are typically categorised as:

- Explicit costs which are directly observable and include broker commissions and taxes, or
- Implicit costs which cannot be observed in the same way but can also result in a reduction in the value of capital invested. Implicit costs include market impact or delay costs which can also result in a gain for the fund (i.e. negative transaction cost).

LGIM and Aviva have provided the transaction costs in the table shown above and have confirmed that no transaction costs are missing for this year’s Statement.

The Occupational Pension Schemes (Administration and Disclosure) (Amendment) Regulations 2018 requires the Trustee to produce an illustration showing the compounding effect of costs and charges on DC funds and to include this in the annual Chair’s statement. As a result, the Trustee has set out an illustration in the appendix which shows the projected values based on one example member of the Plan (not an actual member). The example shows the youngest aged member , investing in two two funds that reported to have the lowest and highest charges and costs as at 5 April 2023. The projections compare what the investments could grow to at age 65 before and after charges have been deducted.

Trustee’s Report

DC Governance Statement (continued)

Value for members assessment

In accordance with regulation 25(1)(b) of the Administration Regulations, the Trustee undertook a light-touch value for members (VfM) assessment exercise in August 2023 in respect of the AVC arrangement, which analysed the extent to which the charges and transaction costs set out above represent good value to members (i.e., the extent to which the charges and transaction costs provide good value in relation to the benefits and services provided). The Trustee undertook this exercise with assistance from its advisers.

The results of this VfM assessment are relevant to the reporting period 6 April 2022 to 5 April 2023, however the assessment reflects the changes made after which will have significantly impacted the results.

In terms of the cost sharing between members and the employers:

- The Employer/Trustee covers the fund charges for the LGIM funds within Section A.
- AVC members pay investment and administration related charges levied by Aviva (i.e., the annual management charges summarised above).
- The Employer or the Trustee pay for all other costs and charges incurred by the Plan (i.e., governance, management).

The light-touch assessment process considered:

- A comparison of the net investment returns for the Plan’s fund range against their relevant indices. Net investment returns consider the fund charges and transaction costs specific to this Plan.
- The value to AVC members of services/benefits which were paid by members in the Aviva.
- The charges AVC members were paying as at 5 April 2023 through Aviva, along with transaction cost benchmarking again market comparators.

As at 5 April 2023, the Trustee considered that members received good value. The good value rating was ascertained for the following reasons:

- The funds generally tracked their relevant indices within sufficient tolerances, particularly over the 5-year (p.a.) reporting period. The Trustee will continue to monitor the fund range.
- In relation to services the AVC members bear the costs and charges for, Aviva was performing positively and was rated well against other providers in the market. The Trustee has no concerns about its ongoing suitability for the AVC membership.
- The scheme charge is competitive and transaction costs were lower than market comparators for the majority of funds.

As a result, the Trustee can conclude that these members receive good value for the services they pay for.

Trustee’s knowledge and understanding (TKU)

The Plan’s Trustee Directors are required to maintain appropriate levels of knowledge and understanding to run the Plan effectively. Each Trustee Director must:

- Be conversant with the Plan’s trust deed and rules and other documentation, as well as the Plan’s statement of investment principles.
- Have knowledge and understanding of the law relating to pensions and trusts and the principles relating to the funding and investment of the assets of occupational pension schemes.

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Trustee’s Report

DC Governance Statement (continued)

The Trustee has a TKU process in place which enables the Trustee Directors, with the benefit of the advice available to them (through the Plan's actuaries, investment advisers, auditors and lawyers), to properly exercise their functions as Trustee Directors of the Plan. The Trustee Directors have a good working knowledge of the Plan's governing documentation, including the Trust Deed and Rules, SIP, and other current documents and policies. There is easy access of the Plan’s key documents via BoardEffect.

The Chair is represented by a professional Trustee, Independent Trustee Services (ITS) Limited.

The Trustee Directors also have sufficient knowledge and understanding of pensions law and regulation, and funding and investment principles.

There is in place an induction programme for new Trustee Directors and regular ongoing training for existing Trustee Directors.

- The induction programme includes ensuring completion of the Pensions Regulator’s Trustee Toolkit within six months of appointment, access provided to Plan documents and a bespoke training session with the Trustee advisors to cover the specifics of the Plan. Two new Trustee Director joined during the reporting period and wwere provided with training and an introduction to the Regulator’s Toolkit.in May 2022 and October 2022 respectively.
- There is a training log in place which is set up to meet the needs of the Trustee Directors to ensure their knowledge is up to date. The training log is monitored regularly to ensure that gaps in knowledge are picked up so that external specialist training can be arranged.
- The latest training programme was put in place by the Plan Secretary in 2023; this is updated annually. The 2023 training programme includes the draft Single Code of Practice, data protection and cyber security, along with training to cover specific gaps in knowledge identified in the latest TKU analysis.

Over the reporting period, the Trustee Directors met all of the TKU requirements via the following activities and processes:

- A skills matrix, which is kept updated by the Plan Secretary. This was last updated in June 2021 and found there was a good spread of skills across the Board.
- Ad hoc training and webinars provided by the Plan’s advisers and providers. For example, existing Directors attended a training covering investment strategy and portfolio construction process in May 2021, and a Risk transfer training in June 2021, both of which were provided by WTW.
- Updates on DC matters on an ad hoc basis by its advisers. Examples of topics covered over the reporting period were:
    - Review on the investment strategy of the old Money Purchase section
- All Trustee Directors have completed the Pensions Regulator’s TKU toolkit, including the two newest Trustee Directors who joined during the reporting period.

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Trustee's Report

DC Governance Statement (continued)

In addition, the Professional Trustee representatives have attended the following DC-related training sessions over the reporting period:

- Pension dashboards (Capita)
- Diversity & Inclusion (LCP)
- Climate risk (AON, Caceis)
- DC Training (Aon)
- Investment (NFTL)
- Hot Topics (PwC, Eversheds, Cadarno, XPS, Linklaters)
- Market experience (Cosan)
- Cyber risk (Gowlings)
- 'Navigating the road ahead' (ISIO)

A Trustee effectiveness assessment was carried out over the reporting period, in November 2022. The last TKU analysis was undertaking in April 2021.

The results of the Trustee effectiveness assessment were generally positive. Feedback from the Directors picked up on length and focus of meetings, communications strategy and querying whether a register documenting delegation of powers and responsibilities was in place.

A Trustee Handbook is in place which outlines the Trustee's processes and procedures and a register detailing the powers in the Trust Deed and Rules, whether the powers are vested in the Company or the Trustee and, if the Trustee, whether these powers have been delegated. These documents will be updated as and when required.

The Trustee Directors are satisfied that they have met their knowledge and understanding duties during the 6 April 2022 to 5 April 2023 governance period.

Signed on behalf of the Trustee

Chris Martin

On behalf of Independent Trustee Services Limited, Chair of the Trustee

ACNielsen (UK) Pension Plan

Date: 25/10/2023

Trustee’s Report

DC Governance Statement (continued)

Appendix - Illustration of the effect of costs and charges on a member’s pension pot

The illustration has been prepared in accordance with the relevant statutory guidance and reflects the impact of costs and charges for a broad example member (based on the youngest member in the AVC policy), using two funds. These funds, as required in the latest statutory requirements, have the highest and lowest total fund charges. As member of Section A, the old Money Purchase section, do not bear any charges and costs, the default arrangement (the LGIM Lifestyle Strategy) is not included in the illustrations.

The illustrations below show the projected fund values based on certain assumptions before and after charges so that the potential impact of charges is clearly shown. Members should be aware that these are simply illustrations, and so the actual fund values and implication of charges for an individual member are likely to differ due to personal details, investment choices and actual performance of the funds. This means that the information contained in this Appendix is not a substitute for the individual and personalised illustrations which are provided to members each year by the Plan.

Example Member	Projection period (years)	Aviva Cash Fund		Aviva Over 5 Year Index-Linked Gilt Index	
		Before charges	After charges	Before charges	After charges
Youngest member	1	£600	£597	£609	£606
	3	£600	£591	£627	£619
	5	£600	£586	£646	£631
	10	£600	£572	£696	£664
	15	£600	£558	£750	£698
	20	£600	£545	£808	£735
	25	£600	£532	£871	£773
	28	£600	£524	£910	£797

Notes:

1. Projected pension account values are shown in today’s terms, and do not need to be reduced further for the effect of inflation.
2. No further contributions are assumed.
3. Investment returns and costs/charges as a percentage reduction per annum are assumed to be deducted at the end of the year.
4. Charges and costs are deducted before applying investment returns.
5. Switching costs are not considered in the lifestyle strategy.
6. Inflation is assumed to be 2.5% each year.
7. Values shown are estimates and are not guaranteed.
8. The real projected growth rates for each fund are as follows:
   - Aviva Cash Fund – 0.0%
   - Aviva Over 5 Year Index-Linked Gilt Index Fund – 1.5%
9. Transactions costs and other charges have been provided by Aviva and covered the period Q2 2018 to Q1 2023. The transaction costs have been averaged by WTW using a time-based approach.
10. Pension scheme’s normal retirement age is 65.
11. Example member: age 37, total initial contribution: £0, starting fund value: £600.

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Trustee's Report

Implementation Statement

Scheme Year ending 5 April 2023

1. Introduction

This document is the Annual Implementation Statement ("the statement") prepared by the Trustee of the ACNielsen (UK) Pension Plan ("the Trustee of the Plan") covering the scheme year ("the year") to 5 April 2023.

The purpose of this statement is to:

- Detail any reviews of the SIP that the Trustee has undertaken, and any changes made to the SIP over the year as a result of the review.
- Set out the extent to which, in the opinion of the Trustee, the Plan's Statement of Investment Principles ("SIP") required under section 35 of the Pensions Act 1995 has been followed during the plan year; including policies on engagement and voting.

The Plan makes use of a wide range of investments; therefore, the principles and policies in the SIP are intended to be applied in aggregate and proportionately, focussing on areas of maximum impact. The Trustee confirms that the investments which the Plan holds were chosen in line with the requirements of s36 of the Pensions Act 1995.

In order to ensure that investment policies set out in the SIP are undertaken only by persons or organisations with the skills, information and resources necessary to take them effectively, the Trustee delegates some responsibilities. In particular, the Trustee has appointed a Fiduciary Manager, Towers Watson Limited, to manage the Plan's DB assets on a discretionary basis. For the DC assets, the Trustee delegates security selection to the Asset Managers they appoint. The Fiduciary Manager's discretion is subject to guidelines and restrictions set by the Trustee. The Asset Managers of the DC assets are governed by fund manager agreements. So far as is practicable, the Fiduciary Manager considers the policies and principles set out in the Trustee's SIP.

A copy of this implementation statement has been made available on the following website: https://www.acnielsenpensionplan.co.uk/

2. Review of and changes to the SIP

The SIP was reviewed and updated once in the year. The versions in place were dated:

- September 2022
- March 2023

The key changes in the update of 2022 were:

- Explicitly acknowledging that whilst voting and engagement can be delegated, the Trustee retains overall responsibility
- Clarifying the role of EOS at Federated Hermes, who is appointed by the Plan's Fiduciary Manager to provide engagement and voting services on behalf of the Plan.
- The SIP was updated to include information about the bulk annuity policy that was taken out with Aviva Life & Pensions UK Limited (Buy-in) in December 2022

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Trustee's Report

Implementation Statement (continued)

2. Review of and changes to the SIP (continued)

- The SIP was updated to include risks associated with the Aviva Life & Pensions UK Limited bulk annuity policy.

For the purpose of assessing how the Plan's SIP has been followed, the remainder of this statement specifically focusses on the SIP agreed in March 2023. All elements that were included in the previously agreed SIP (dated September 2022) remained in the March 2023 SIP.

3. Adherence to the SIP

Under the Pensions Act 1995 (as amended), trustees are required to prepare a Statement of the principles governing investment decisions. This document contains that Statement, as drawn up by the Trustee of the ACNielsen (UK) Pension Plan ("the Plan"), and it describes the investment principles pursued by the Trustee of the Plan ("the Trustee"). The Plan's Statement is divided into two sections: one (Section 3) relating to the Defined Benefit ("DB") Section and the other (Section 4) relating to the Defined Contribution ("DC") Section.

The Trustee has consulted A.C.Nielsen Company Limited ("the Employer") on the principles set out in this Statement and will consult the Employer on any changes to it. However, the ultimate power and responsibility for deciding investment policy lies solely with the Trustee.

Before drawing up this Statement, the Trustee has obtained and considered written advice from the Plan's DB Fiduciary Manager (WTW) and DC investment consultant (WTW). The Trustee will review the document regularly, at least every three years, and without delay following a significant change in investment policy.

SIP Section 3: Defined Benefit Section

Plan Investment Objective

This section specifies the current long-term investment objective of the Trustee for the Plan (100% funded on a gilts basis) noting that the Trustee will review this objective regularly and amend as appropriate.

Investment Strategy

The Trustee has received advice on an investment strategy aimed at maximising the chances of achieving its objectives. The investment strategy was formally reviewed as at August 2021, following the 2021 triennial actuarial valuation, and again in Q4 2022 as part of executing a buy-in with Aviva. The Trustee monitors progress relative to its objectives on a quarterly basis as outlined below.

The Trustee believes in diversification and the Plan's portfolio is built using a diverse range of return-seeking assets and a dedicated allocation to liability driven investments which seek to match the sensitivity of the Plan's liabilities to inflation and interest rates, in line with the policies set out in the SIP. Throughout the year, implementation of this strategy including the realisation of investments was delegated to the Fiduciary Manager who managed the balance of these investments. The Fiduciary Manager acts within guidelines set by the Trustee including asset allocation. The guidelines were updated in Q4 2022 to reflect the changes required as part of the Trustee undertaking a buy-in with Aviva. The Fiduciary Manager is required to report any breach of these guidelines to the Trustee. No breaches were reported during the year. The Trustee considers that the balance of investments held and the approach to managing risk is in the best interests of members in order to mitigate downside risk to the funding position of the Plan whilst helping the Plan to achieve its ultimate objective over an appropriate time horizon.

In order to ensure appropriate incentivisation and alignment of decision-making between the Trustee and the Fiduciary Manager, the Fiduciary Manager is subject to a number of obligations set out in its contractual arrangements with the Trustee and the Fiduciary Manager is aware of and gives effect to the principles set

Trustee's Report

Implementation Statement (continued)

3. Adherence to the SIP (continued)

Investment strategy (continued)

out in the Trustee's SIP. The Fiduciary Manager acted in accordance with these obligations throughout the year.

The Trustee's investment strategy seeks to outperform a benchmark based on a projection of the Plan's liability cashflows. The liability benchmark is updated following each actuarial valuation, and when there is any significant change to the structure of the Plan's liabilities. The benchmark was last updated as part of the buy-in transaction in Q4 2022.

The Fiduciary Manager monitored and reviewed the Plan's investments and managers on a regular basis to ensure that the investment strategy remained consistent with the Plan's objectives. On a quarterly basis, the Trustee reviewed the Plan's asset allocation, funding position and progress relative to the journey plan (the projected path to achieve the Plan's objective), and measures of the expected return and risk of the Plan's portfolio to ensure that these remained broadly consistent with the Plan's objectives.

The Trustee, following the advice of the Fiduciary Manager, materially de-risked the Plan in December 2022 via the purchase of a bulk annuity policy that was taken out with Aviva Life & Pensions UK Limited (Buy-in), and a reduction of the portfolio's target from gilts +1.4% to gilts +0.7% (excluding the Buy-in). To facilitate the process of purchasing the bulk annuity, the Trustee sold its holdings in the TWIM Core Diversified Fund – one of two growth assets held in the portfolio. The Plan's journey plan was updated to reflect these changes to the portfolio.

The Trustee has implemented a dynamic risk framework whereby the Plan's funding position is monitored relative to agreed upside triggers which are used to indicate if the Plan is sufficiently ahead of the journey plan to warrant reviewing or changing the Plan's investment strategy (eg. the Plan may be in a position to reduce investment risk or the investment time horizon on breaching an upside trigger). Throughout the year, the Fiduciary Manager monitored the Plan's funding position and progress relative to the triggers on a daily basis using its proprietary system, the Asset Liability Suite. No triggers were breached during the year.

The Trustee has a policy to ensure that the Plan's cashflow requirements can be readily met without disrupting its investments. Throughout the year, the Fiduciary Manager regularly monitored the level of cash in the Plan, and cashflows into / out of the Plan to ensure that there were sufficient assets in readily realisable investments to meet the Plan's requirements without disrupting its investments, including during the LDI crisis of September to October 2022. The Fiduciary Manager can make adjustments to the Plan's allocation to cash when necessary, within guidelines set by the Trustee. The Trustee monitored the liquidity of the Plan's portfolio and cashflows into and out of the Plan on a quarterly basis.

Investment Managers

Throughout the year, the Fiduciary Manager regularly monitored the performance of the Plan's investment managers. Performance was monitored relative to an appropriate market benchmark where one was available or an appropriate return objective where a market benchmark was not available. In addition, the Fiduciary Manager assessed the performance of the Plan's investment managers relative to peers and in the context of the prevailing market environment. Throughout the year, the Fiduciary Manager and Trustee focussed their assessment of investment manager performance on the long-term, consistent with the Trustee's position as a long-term investor.

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Trustee's Report

Implementation Statement (continued)

3. Adherence to the SIP (continued)

Investment Managers (continued)

On a forward-looking basis, past performance is only one input into the Fiduciary Manager's assessment of an investment manager, which relies predominantly on research views based on a range of qualitative and quantitative factors, including the consideration of Sustainable Investment, or Environment Social and Governance (ESG) factors as outlined below. Whilst there were some changes to the underlying investment managers, no managers were terminated based on short-term performance alone. Consistent with the Plan's long investment time horizon, the Trustee seeks to be a long-term investor and the Fiduciary Manager has appointed managers (in the majority of cases) with the expectation of a long-term relationship. This in turn allows investment managers to take a longer-term approach to investing, including engagement with issuers of debt and equity, with a view to improving investment outcomes over the long term. As at the end of the year, the Plan was invested in 3 investment funds (plus the bulk annuity held with Aviva Life & Pensions UK Limited) having sold its holdings in the TWIM Core Diversified Fund. The average tenure of the Trustee's investments in these funds was 6.5 years.

The Trustee received quarterly monitoring reports from the Fiduciary Manager. Performance shown in these reports is based on performance reporting provided by the Plan's Independent Performance Measurer, StateStreet. These reports are included for scrutiny and discussion at the Trustee's quarterly meetings. The reports include details of short-, medium- and longer-term performance relative to benchmarks/targets for all funds as well as commentary on an exceptions basis regarding performance with significant deviation from benchmark/target. Throughout the year, the Trustee used these reports as an input into its ongoing assessment of the Fiduciary Manager's performance. Similar to the approach taken with the Plan's underlying investment managers, the Trustee appointed the Fiduciary Manager with the expectation of a long-term relationship and therefore takes a long-term approach to its assessment of the Fiduciary Manager's performance. The Fiduciary Manager was appointed 7 years ago.

<u>Manager selection, de-selection and monitoring</u>

As set out above, the Trustee has delegated responsibility to the Fiduciary Manager to implement the Trustee's agreed investment strategy, including making certain decisions about investments (including asset allocation and manager selection/deselection) in compliance with Sections 34 and 36 of the Pensions Act.

As part of its manager selection and ongoing oversight processes, the Fiduciary Manager considers the level of fees and the type of fee structures used by each manager (including a consideration of the alignment of interests created by certain fee structures).

The Fiduciary Manager considers a number of factors including the asset class / investment strategy, the way in which the strategy is implemented (e.g., active management or passive benchmark tracking), and fee benchmarking relative to peers. The majority of the Plan's investment managers were paid an ad valorem fee, in line with normal market practice, for a given scope of services which includes consideration of long-term factors and engagement.

Trustee's Report

Implementation Statement (continued)

3. Adherence to the SIP (continued)

Manager selection, de-selection and monitoring (continued)

During the year, the Fiduciary Manager reviewed and reported to the Trustee on the total fees and costs incurred by the Plan through its investments. As part of its review and reporting on the Plan's costs, the Fiduciary Manager also reported to the Trustee on the costs associated with portfolio turnover, including a consideration of whether experienced turnover within investment strategies was consistent with the individual manager's expectations and within the Fiduciary Manager's expectations given its knowledge and understanding of the asset class and peers.

The Fiduciary Manager is also responsible for managing the sustainability of the portfolio and how ESG factors are allowed for in the portfolio. The Trustee's view is that ESG factors can have a significant impact on investment returns, particularly over the long-term. As a result, the Trustee believes that the incorporation of ESG factors is in the best long-term financial interests of its members. The Trustee has appointed a Fiduciary Manager who shares this view and has fully embedded the consideration of ESG factors in its processes. The Trustee incorporates an assessment of the Fiduciary Manager's performance in this area as part of its overall assessment of the Fiduciary Manager's performance.

The Fiduciary Manager's process for selecting, monitoring and de-selecting managers explicitly and formally includes an assessment of a manager's approach to SI (recognising that the degree to which these factors are relevant to any given strategy is a function of time horizon, investment style, philosophy and exposures). Where ESG factors are considered to be particularly influential to outcomes, the Fiduciary Manager engages with investment managers to improve their processes.

The Partners and Core Diversified Funds have Article 8 Sustainable Finance Disclosure Regulation designation. This covers Funds that promote, among other characteristics, environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices, amongst other requirements.

Through its investment in the Partners Fund, the Fund also manages risk and considered ESG integration in its investment processes and strategies through:

UK forestry –The strategy will acquire unused agricultural land in the north of England and Scotland to plant trees and grow forests, capturing carbon in the process. The intention is to hold the forests that have been created for three to five years until the trees have established themselves after which there are various possible exit routes.

Japanese Solar Panels - Invests (through a third-party manager) in Japanese renewable energy with some exposure to other solar energy. Invests in late-stage construction and development of solar, biomass and battery storage in Japan.

Through its investment in the Core Diversified Fund, which the fund was invested in until December 2022, the Fund also manages risk and considered ESG integration in its investment processes and strategies through:

A Global Prime Real Estate strategy which has introduced climate filters as an explicit screen in the investment process following direct engagement with the manager.

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Trustee's Report

Implementation Statement (continued)

3. Adherence to the SIP (continued)

Company level engagement and rights attached to investments (including voting)

The Trustee has delegated responsibility for the selection, retention and realisation of investments to the Fiduciary Manager, and in turn to the Plan's investment managers. The day-to-day integration of ESG considerations and stewardship activities (including voting and engagement) are delegated to the Plan's investment managers.

Through the engagement undertaken by the Fiduciary Manager, the Trustee expects investment managers to sign up to local Stewardship Codes and to act as responsible stewards of capital as applicable to their mandates. The Fiduciary Manager considers the investment managers' policies and activities in relation to Environmental, Social and Governance (ESG) and stewardship both at the appointment of a new manager and on an ongoing basis. The Fiduciary Manager engages with managers to improve their practices and may terminate a manager's appointment if they fail to demonstrate an acceptable level of practice in these areas. However, no managers were terminated on these grounds during the year.

The Plan is invested across a diverse range of asset classes which carry different ownership rights, for example fixed income whereby these holdings do not have voting rights attached. Therefore, voting information was only requested from the Plan's equity managers as here there is a right to vote as an ultimate owner of a stock. Responses received are provided in the table below. Where managers provided multiple examples of votes three of those deemed most significant by the Trustee have been shown below.

Further information on the voting and engagement activities of the managers is provided in the table below. Although the Plan did not have any holdings in the TWIM CDF from December 2022 onwards, it was invested in the Fund for a majority of the duration covered by this statement. As such, the table includes voting data and engagement activities of the manager, for the duration prior to December 2022.

At the end of the year, the Plan's equity holdings were invested across five pooled funds:

- Towers Watson Investment Management (TWIM) Global Equity Focus Fund - an active global equity fund managed by the Fiduciary Manager which invests in number of underlying managers
- STOXX Willis Towers Watson World Climate Transition Index Fund (AMX)
- Manager A – an active emerging markets equity fund
- Manager B – an active emerging markets equity strategy
- Manager C – an active China equity strategy

As outlined above, the Plan is invested in both active and passive equity funds. For the active funds, the Trustee has decided not to publicly disclose investment manager names. This decision relates to the underlying investment managers in the TWIM Global Equity Focus Fund and Manager A, C and D. Given the nature of these investments, the Trustee believes that publicly disclosing the names of the Plan's investment managers could impact the investment manager's ability to generate the best investment outcome for the Plan and ultimately, the Plan's members.

Trustee's Report

Implementation Statement (continued)

3. Adherence to the SIP (continued)

Company level engagement and rights attached to investments (including voting) (continued)

Towers Watson Partners Fund

<table>
<tr><td>Voting activity</td><td colspan="4">Number of votes eligible to cast: 25,560
Percentage of eligible votes cast: 92.8%
Percentage of votes with management: 86.0%
Percentage of votes against management: 13.5%
Percentage of votes abstained from: 0.5%</td></tr>
<tr><td rowspan="7">Most significant votes cast</td><td>Company</td><td>Anglo American Plc</td><td>Cigna Corporation</td><td>Midea Group</td></tr>
<tr><td>Size of holdings</td><td>0.06%</td><td>0.32%</td><td>0.13%</td></tr>
<tr><td>Resolution</td><td>Approve Climate Change Report</td><td>Report on gender pay gap</td><td>Key Management Team Stock Ownership Plan and the Midea Global Partners Plan 8th Phase Stock Ownership Plan (draft) and Its Summary</td></tr>
<tr><td>Decision /Vote</td><td>Supported Management</td><td>For</td><td>Against</td></tr>
<tr><td>Rationale for decision</td><td>The climate change report sets out clear pathways to carbon neutral operations by 2040 and the company's ambition to reduce Scope 3 emissions by 50%, also by 2040.</td><td>TWIM support disclosure of data to assess Cigna's gender pay gap on a raw and adjusted basis, which will positively support Cigna's global recruitment and human resources efforts.</td><td>ROE of Midea Group in 2021 was 24.09% but the threshold for ROE is set at 20% in 2022 and 2023 and 18% for 2024 and 2025. Don't think it is properly designed.</td></tr>
<tr><td>Rationale for classifying as significant</td><td>In line with its Proxy Voting Policy, TWIM generally supports initiatives to mitigate environmental risks which will, in turn, enhance long-term company performance.</td><td>Diversity, equity and inclusion are important for the long-term success of a company for them to attract and retain talent which in turn is important for shareholders' interests.</td><td>Against management</td></tr>
<tr><td>Outcome of vote</td><td>Pass</td><td>Fail</td><td>For</td></tr>
<tr><td>Use of proxy voting</td><td colspan="4">For the TW PF, the equity exposure comes from four main areas:
– Its global equity portfolio where EOS at Federated Hermes ("EOS") provides voting recommendations to enhance engagement and help achieve responsible ownership. EOS's voting recommendations are informed by its extensive research and experience in the area of stewardship as well as its long-term engagement activities with companies. The underlying managers must provide an explanation and note their rationale when they choose to vote differently to the recommendation. The underlying managers in this portfolio use ISS's 'ProxyExchange' electronic voting platform to facilitate voting.
– Its China equity manager uses Glass Lewis service where they have created a bespoke policy
– Its emerging markets equity managers use ISS, Glass Lewis, SES and Broadridge Proxy Edge platforms for information and to facilitate voting
– Its long-short equity managers use ISS to provide corporate research and to facilitate the voting process.</td></tr>
</table>

Trustee's Report

Implementation Statement (continued)

3. Adherence to the SIP (continued)

Company level engagement and rights attached to investments (including voting) (continued)

Core Diversified Fund

Voting activity	Number of votes eligible to cast: 3,194 Percentage of eligible votes cast: 93.2% Percentage of votes with management: 85.0% Percentage of votes against management: 15% Percentage of votes abstained from: 0.5%			
Most significant votes cast	**Company**	Alphabet Inc.	SNAM SpA	TERNA Rete Elettrica Nazionale SpA
	Size of holdings	0.60%	0.22%	0.21%
	Resolution	Report on Risks of Doing Business in Countries with Significant Human Rights Concerns	Accept Financial Statements and Statutory Reports	Approve Remuneration Policy
	Decision /Vote	For	Against	Against
	Rationale for decision	For shareholder resolution, against management recommendation / Shareholder proposal promotes better management of ESG opportunities and risks.	Inadequate management of climate-related risks	Apparent failure to link pay and appropriate performance
	Rationale for classifying as significant	Vote against management	Those that have quantitative substance and qualitative materiality.	Those that have quantitative substance and qualitative materiality.
	Outcome of vote	Fail	Pass	Pass
Use of proxy voting	For the CDF, through our equity and listed real asset strategies, we work with EOS to provide corporate engagement and voting recommendation services to enhance the efforts of the underlying managers where possible. The underlying manager must provide an explanation and note their rationale when they choose to vote differently to the recommendation. The underlying mangers also use ISS facilitate voting and provide research. Our China equity manager uses Glass Lewis service where they have created a bespoke policy.			

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Trustee's Report

Implementation Statement (continued)

3. Adherence to the SIP (continued)

Industry wide / public policy engagement:

As mentioned in the SIP, the Fiduciary Manager has partnered with EOS at Federated Hermes (EOS) for a number of years to enhance its stewardship activities. One element of this partnership is undertaking public policy engagement on behalf of its clients (including the Trustee). This public policy and market best practice engagement is done with legislators, regulators, industry bodies and other standard-setters to shape capital markets and the environment in which companies and their investors operate, a key element of which is risk related to climate change. The Fiduciary Manager represents client policies/sentiment to EOS via the Client Advisory Council, of which its Head of Stewardship currently chairs. It applies EOS' services, from public policy engagement to corporate voting and engagement, to several of its funds. Some highlights from EOS' activities over 2022:

- Engaging with 1,138 companies on 4,250 issues and objectives
- Making voting recommendations on 134,188 resolutions at 13,814 meetings, including recommended votes against 24,461 resolutions
- 33 consultation responses or proactive equivalent and 75 discussions with relevant regulators and stakeholders
- Active participation in many collaborations including Climate Action 100+, Principles for Responsible Investment (PRI), and UN Guiding Principles Reporting Framework

The Fiduciary Manager is also engaged in a number of industry wide initiatives and collaborative engagements including:

- Becoming a signatory to the 2020 UK Stewardship Code in the first wave, and subsequently retaining that status
- Co-founding the Net Zero Investment Consultants Initiative in 2021, with a commitment across its global Investment business
- Joining the Net Zero Asset Managers Initiative in 2021, committing 100% of its discretionary assets
- Being a signatory of the Principles for Responsible Investment (PRI) and active member of their Stewardship Advisory Committee
- Being a member of and contributor to the Institutional Investors Group on Climate Change (IIGCC), Asian Investors Group on Climate Change (AIGCC), and Australasian Investors Group on Climate Change (IGCC)
- Co-founding the Investment Consultants Sustainability Working Group
- Continuing to lead collaboration through the Thinking Ahead Institute and WTW Research Network
- Being a founding member of The Diversity Project
- Being an official supporter of the Transition Pathway Initiative

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Trustee's Report

Implementation Statement (continued)

3. Adherence to the SIP (continued)

Other investment Matters

The Trustee has put in place an Integrated Risk Management Framework which seeks to identify, manage and monitor risks which could negatively impact the Plan's ability to meet its funding objectives. This framework incorporates funding, covenant and investment factors and is ultimately used to form the Plan's investment strategy. In relation to investment factors, the Trustee has identified a number of risks which it seeks to manage and monitor, in conjunction with the Fiduciary Manager. Solvency and mismatch risk, investment manager risk, liquidity risk, and interest rate and inflation risks have been discussed above in the relevant sections on investment strategy and investment managers. The Fiduciary Manager reported to the Trustee on each of these risks in quarterly meeting papers which were discussed at the Trustee's quarterly meetings.

The Trustee recognises a number of risks involved in the investment of the Plan's assets and, where applicable, monitors these risks in conjunction with the Fiduciary Manager:

- Solvency risk and mismatch risk: are measured through a qualitative and quantitative assessment of the expected development of the assets relative to the liabilities. They are managed through the development of a portfolio that is consistent with delivering the Trustee's investment objective.
- Investment manager risk: is measured by the expected deviation of the prospective risk and return, as set out in the investment managers' objectives. It is managed through diversification across investment managers, ongoing monitoring of the performance of the investment managers and ongoing qualitative assessments of the investment managers by the Fiduciary Manager.
- Liquidity risk: is measured by the level of cashflow required by the Trustee over various periods. It is managed by the Fiduciary Manager assessing the Plan's cashflow requirements, in conjunction with the Trustee's administrators, and ensuring that the Plan's assets are sufficiently liquid.

In addition to these risks, the Trustee also seeks to measure and manage:

- Currency risk: some of the Trustee's investments are denominated in a different currency to the Plan's liabilities which creates a mismatch. The Fiduciary Manager managed the Plan's exposure to foreign currencies within guidelines set by the Trustee. Currency hedging was implemented via investing in GBP-hedged share classes for overseas denominated funds. Throughout the year, the Fiduciary Manager left a small proportion of the Plan's foreign currency exposure unhedged for reasons of diversification and return generation. The Fiduciary Manager monitored the Plan's unhedged exposures on a regular basis and reported this to the Trustee as part of its quarterly meeting papers.
- Custodial risk: the Plan is exposed to the risk that any assets held on the custodian's balance sheet could be lost if the custodian was to become insolvent. The Trustee addressed this by investing in pooled funds where the Plan's assets are held by a separate custodian appointed by the manager. In addition, any uninvested cash was swept into a pooled cash fund at the custodian where the assets are held off the custodian's balance sheet. In addition, the Fiduciary Manager's specialist research team reviews the custodian on a regular basis.
- Political risk: the Trustee recognises that the value of the Plan's assets may be impacted by political regimes and actions, particularly in less established/ more opaque markets. Throughout the year, the Plan's portfolio remained well diversified by geography. The Fiduciary Manager considers political risk when determining whether to allocate capital to an investment and also in determining the relative sizing of an investment.

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Trustee's Report

Implementation Statement (continued)

3. Adherence to the SIP (continued)

Other investment Matters (continued)

- Insurer counterparty risk: the Plan is exposed via the bulk-annuity policy it holds with Aviva Life & Pensions UK Limited. Insurer counterparty risk is measured by the solvency of Aviva Life & Pensions UK Limited. It is managed by the Trustee by considering the financial stability of Aviva Life & Pensions UK Limited and the financial stability of the UK insurance regime at the point of investment.

SIP Section 4: Defined Contribution Section ('DC')

DC Plan Investment Objectives and long-term investment policy

These sections specify the current long-term investment objective of the Trustee for the Plan, which, from June 2022, was primarily in relation to the Old Money Purchase section, along with the remaining AVC policy, noting that the Trustee reviews this objective regularly and amend as appropriate.

Investment Strategy

Within the relevant year (June 2022), New Money Purchase section member assets invested in a policy with Aviva were transferred out to the Fidelity Master Trust. This took place as a result of ongoing monitoring by the Trustee. Following an assessment, it was determined member would receive better value for money, for example, receiving lower charges, additional retirement option, wider range of investment options, all under an enhanced governance framework through the Master Trust.

The Aviva fund range remained in situ for the additional voluntary contribution (AVC) arrangement for DB members.

The old Money Purchase section sole investment strategy is currently under consideration as part of a wider general strategy review of this section by the Trustee and its advisers.

Investment Managers

The AVC arrangement held with Aviva is monitored on an annual basis. Performance is measured against the relevant benchmarks set out in the SIP. As the majority of funds are passive, their benchmarks are the relevant indices for the asset classes/geographical areas represented. For active funds, the benchmarks have been agreed after receiving advice from the Trustee's professional advisers. During the Plan year, the majority of funds performed in line with their benchmarks. The Trustee accepts that there may be deviations from benchmarks from time to time and provided these are over short periods of time will not normally take any action. WTW as the appointed investment adviser will update the Trustee if a particular issue arises with one of the funds made available within the AVC policy.

The Trustee appointed the Plan's investment managers with an expectation of a long-term partnership. Over the Plan year to 5 April 2023, there were no new investment manager appointments or terminations by the Trustee, although the majority of assets held with Aviva were transferred out to the Fidelity Master Trust (and therefore out of this Plan) in respect of the new Money Purchase section membership.

The Trustee takes a pragmatic approach to ESG considerations, which is reflected in the SIP. The Trustee has delegated responsibility for the selection, retention and realisation of investments to the underlying investment managers. The Trustee recognises that long-term sustainability issues, including climate change, may have an impact on investment risk and outcomes. At the present time the strategy is to invest predominately in the passive funds which do not take account of ESG considerations in the selection, retention and realisation of investments.

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Trustee's Report

Implementation Statement (continued)

3. Adherence to the SIP (continued)

Investment Managers (continued)

However, the Trustee recognises that some members may wish to invest in accordance with responsible investment principles, and hence the Aviva Stewardship fund is available in the self-select range of AVCs for the DB Section.

DC manager selection, de-selection and monitoring

The Trustee has responsibility for the selection, removal and monitoring of the DC assets under the old Money Purchase section which is invested through a Legal & General Investment Manager (LGIM) platform, and the Aviva AVC policy investment through BlackRock and Aviva.

Company level engagement and rights attached to investments (including voting)

The DC funds are predominantly passively managed in pooled funds (with LGIM and Aviva). As a result, the Trustee's direct influence on the fund manager's voting policy is limited by the pooled nature of these investments. The Trustee has therefore chosen to adopt an approach to ESG that is consistent with the opportunities and constraints of this position. This is reflected in the SIP.

The Trustee has delegated all voting and engagement activities to the underlying managers, but nevertheless expects effective activities in these areas to form part of their processes. The Trustee has reviewed the underlying investment managers' stewardship policies (made available at the following links: https://www.lgim.com/uk/en/capabilities/corporate-governance/ and https://www.aviva.co.uk/services/about-our-business/about-us/our-approach-to-responsible-investing/).

When reviewing the LGIM's and Aviva's stewardship approach the Trustee found that:

1. During 2022, LGIM voted on over 171,000 proposals (worldwide) at over 15,750 company meetings. LGIM has implemented their own custom policies, and rely on the service of ISS, their proxy advisor. LGIM does not automatically follow recommendations of proxy advisers and has put in place a custom voting policy, which requires companies, amongst other things, to have a higher level of independence and diversity on the board, or to provide more in-depth disclosure regarding executive compensation.

2. Aviva voted on 73,438 resolutions at 6,732 meetings in 2022. Aviva has a multi-manager team which is responsible for monitoring all of the funds and fund managers on Aviva's investment platforms. It analyses and selects the fund managers using a 5P process: Parent, Product, Process, People, and Performance. It incorporates ESG considerations into its analysis in each of these areas. For BlackRock index tracking funds, Aviva has moved away from insured funds to tax transparent funds that are administered by Aviva Investors. This enabled Aviva Investors to take on the responsibility for the voting rights for the investments held.

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Trustee's Report

Implementation Statement (continued)

3. Adherence to the SIP (continued)

Company level engagement and rights attached to investments (including voting): (continued)

The table below sets out the relevant voting activities, including any votes cast on the Trustee's behalf and examples of votes cast that the underlying managers deem to be significant. The voting statistics covers equity funds available under the Plan for the year ended 31 March 2023.

Fund name	Voting activity	Example of one of the most significant votes cast during the period
LGIM Global Equity Market Weights 30:70 Index 75% Currency Hedged	**Number of eligible meeting where the provider was able to vote: 7,319** **Percentage of resolutions that were voted on: 99.8%** **Percentage of votes cast which were with a Board's proposal: 80.7%** **Percentage of votes cast which were against a Board's proposal: 18.2%**	Company: Royal Dutch Shell Plc **Resolution**: 20 - Approve Shell Energy Transition Progress Update **How provider voted**: Against proposal **Rationale**: Climate change. Substantial progress made by company in strengthening operational emissions reduction targets by 2030. However, LGIM remain concerned of the disclosed plans for oil and gas production, and would benefit from further disclosure of targets
Aviva BlackRock (30:70) Currency Hedged Global Equity Index Fund	**Number of eligible meeting where the provider was able to vote: 2,482** **Percentage of resolutions that were voted on: 95.7%** **Percentage of votes cast which were with a Board's proposal: 75.0%** **Percentage of votes cast which were against a Board's proposal: 23.0%**	**Company**: Home Depot Inc. **Resolution**: 9. Report on Efforts to Eliminate Deforestation in Supply Chain **How provider voted**: For proposal **Rationale**: A vote in favour is applied as resolution asked management to assess, report on and reduce key impacts and dependencies on nature for high impact sectors.
Aviva BlackRock World (Ex-UK) Equity Index Fund	**Number of eligible meeting where the provider was able to vote: 2,102** **Percentage of resolutions that were voted on: 94.4%** **Percentage of votes cast which were with a Board's proposal: 67.6%** **Percentage of votes cast which were against a Board's proposal: 30.3%**	**Company**: Costco Wholesale Corporation **Resolution**: Item 1d. Elect Director Hamilton E. James **How provider voted**: Against proposal **Rationale**: Non-independent chair. In addition, individual is held accountable for the company's human-rights issues.
Aviva BlackRock UK Equity Index Fund	**Number of eligible meeting where the provider was able to vote: 711** **Percentage of resolutions that were voted on: 99.7%** **Percentage of votes cast which were with a Board's proposal: 93.0%** **Percentage of votes cast which were against a Board's proposal: 6.0%**	**Company**: RELX Plc **Resolution**: 2. Approve Remuneration Report **How provider voted**: Against proposal **Rationale**: Concerns over excessive level of vesting for achievement of the threshold performance conditions under LTIP i.e 25% of award opportunity, representing share awards at 112.5% of salary for the CEO based on current grant levels.
Aviva Stewardship Fund	**Number of eligible meeting where the provider was able to vote: 51** **Percentage of resolutions that were voted on: 99.5%** **Percentage of votes cast which were with a Board's proposal: 96.2%** **Percentage of votes cast which were against a Board's proposal: 2.9%**	**Company**: Standard Chartered Plc **Resolution**: 32. Approve Shareholder Requisition Resolution **How provider voted**: For proposal **Rationale**: Should serve to enhance the company's current commitments to net zero goals and its policies and actions.

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Trustee's Report

Implementation Statement (continued)

3. Adherence to the SIP (continued)

Industry Wide/Public Policy Engagement

LGIM's Investment Stewardship team held 361 meetings/calls and 863 written engagements in respect of 902 companies during 2022. As in the previous year, climate change was the most frequently discussed engagement topic (281 times). North America was the biggest engagement market (489). The most frequently engaged companies were BP (13 engagements), along with followed by Tesco (10) and Unilever (9).

In 2022, LGIM's three main focuses were on policy advocacy and collaboration, environment and diversity. Examples of these were (respectively): nature being a core focus of policy work (covering agriculture, water, etc.); under LGIM's Climate Impact Pledge, ~80 companies were subject to potential voting sanctions for not meeting minimum standards; and first AGM season of voting against resolutions due to lack of ethnic diversity.

Aviva had 3,328 company engagements during 2022, of which 1,425 were substantive and 2,361 were collaborative letter-based engagements. These focussed mainly on climate disclosure and human rights. Over the past year, Aviva has achieved 366 engagement 'wins' where there were changes in corporate behaviours in line with a prior engagement ask.

An example of Aviva engaging to improve climate momentum is HSBC. Where HSBC demonstrated insufficient progress towards putting their climate strategies to a vote, they were pressured by shareholders filing their own resolutions. HSBC announced it would update its climate strategy and Aviva engaged with HSBC during the year, sharing its expectations on a robust climate strategy HSBC subsequently published an updated climate policy featuring an ask Aviva provided that required its oil and gas clients to provide sufficient transition plans, and HSBC committed to stop direct financing of new oil and gas fields.

4. Conclusion

The Trustee considers that all SIP policies and principles were adhered to during the year.

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Trustee's Report

Statement of Trustee's Responsibilities

The financial statements, which are prepared in accordance with applicable law and United Kingdom Accounting Standards, including Financial Reporting Standard 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland' (United Kingdom Generally Accepted Accounting Practice), are the responsibility of the Trustee. Pension scheme regulations require, and the Trustee is responsible for ensuring, that those financial statements:

- show a true and fair view of the financial transactions of the Plan during the Plan year and of the amount and disposition at the end of the Plan year of its assets and liabilities, other than liabilities to pay pensions and benefits after the end of the Plan year; and
- contain the information specified in Regulations 3 and 3A of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, including making a statement whether the financial statements have been prepared in accordance with the relevant financial reporting framework applicable to occupational pension schemes.

In discharging the above responsibilities, the Trustee is responsible for selecting suitable accounting policies, to be applied consistently, making any estimates and judgments on a prudent and reasonable basis, and for the preparation of the financial statements on a going concern basis unless it is inappropriate to presume that the Plan will not be wound up.

The Trustee is also responsible for making available certain other information about the Plan in the form of an annual report.

The Trustee also has a general responsibility for ensuring that adequate accounting records are kept and for taking such steps as are reasonably open to them to safeguard the assets of the Plan and to prevent and detect fraud and other irregularities, including the maintenance of an appropriate system of internal control.

The Trustee is responsible under pensions legislation for preparing, maintaining and from time to time revising a schedule of contributions showing the rates of contributions payable towards the Plan by or on behalf of the employer and the dates on or before which such contributions are to be paid. The Trustee is also responsible for keeping records in respect of contributions received and for adopting risk-based processes to monitor whether contributions are made to the Plan by the employer in accordance with the schedule of contributions. Where breaches of the schedule occur, the Trustee is required by the Pensions Acts 1995 and 2004 to consider making reports to The Pensions Regulator and the members.

The Trustee is responsible for the maintenance and integrity of the financial information of the Plan included on the Plan's website. Legislation in the United Kingdom governing the preparation and dissemination of the financial statements may differ from legislation in other jurisdictions.

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Trustee's Report

Compliance Matters

Constitution

The Plan was established on 6 April 1997 and is currently governed by the Third Definitive Trust Deed and Rules dated 24 July 2008, as amended by subsequent deeds.

Taxation status

In accordance with the provisions of Schedule 36 of the Finance Act 2004, the Plan became a registered pension scheme under Chapter 2 of Part 4 of the Finance Act 2004 with effect from 6 April 2006.

Pension increases

For GMP earned between 6 April 1988 and 5 April 1997, post 5 April 1997 and post 5 April 2005 member benefits, the Plan Rules state that pensions in payment are increased on 6 April each year by reference to the increase in the Consumer Prices Index (CPI) at the previous September. The September 2021 CPI was 3.1% so the pensions in payment were increased at 6 April 2022 by 3.0% (2021: 0.5%) for GMP benefits and 3.1% (2021: 0.5%) for post 5 April 1997 and post 5 April post 2005 benefits.

For all other members, the Plan Rules include provisions which allow the Company to award discretionary increases on certain elements of pensions in payment, typically elements that do not receive statutory increases. No discretionary pension increases were awarded in the year to 5 April 2023.

Deferred pensions were increased in accordance with statutory requirements.

Calculation of transfer values

Transfer values paid during the year were calculated and verified in the manner prescribed by regulations under Section 94(1) of the Pension Schemes Act 1993. No allowance is made in the calculation of transfer values for discretionary pension increases.

Refunds to the employer

No refunds have been made to the employer during the year.

The Pensions Regulator

The statutory body that regulates occupational pension schemes is the Pensions Regulator ("TPR"). TPR can be contacted at:

The Pensions Regulator
Napier House
Trafalgar Place
Brighton BN1 4DW

Telephone: 0345 600 0707
Email: customersupport@tpr.gov.uk
Website: www.thepensionsregulator.gov.uk

Trustee's Report

Compliance Matters (continued)

GDPR

The General Data Protection Regulation ("GDPR") is a regulation by the European Parliament intended to strengthen and unify data protection for all individuals within the EU. It also addresses the export of personal data outside of the EU. GDPR came into force from 25 May 2018 and the Trustee worked with its advisers to formulate its GDPR policy so that it was compliant. The Trustee has communicated with members on this matter.

From 1 January 2021, the UK GDPR came into effect which will run alongside the Data Protection Act (DPA) 2018, and the EU GDPR to which all EU nations remain subject and this includes where Capita operate in the EU. This ensures that we have adequate provision for the safe processing of data in the UK and in the EU/EEA.

Our obligations under the UK GDPR are fundamentally the same as our obligations under the EU GDPR and we continue to remain subject to UK Data Protection laws.

MoneyHelper

The Money and Pensions Service (MaPS) was created in 2019 as a single body providing information to the public on matters relating to workplace and personal pensions.

Telephone: 0800 011 3797

Email: pensions.enquiries@moneyhelper.org.uk

Website: https://www.moneyhelper.org.uk

Internal Dispute Resolution Procedures (IDRP)

It is a requirement of the Pensions Act 1995 that the Trustees of all occupational pension schemes must have Internal Dispute Resolution Procedures (IDRP) in place for dealings with any disputes between the trustees and the scheme beneficiaries. A dispute resolution procedure has been agreed by the Trustee, details of which can be obtained by writing to the Secretary to the Trustee of the ACNielsen (UK) Pension Plan, c/o Mrs Sue Kettle, Capita, Hartshead House, 2 Cutlers Gate, Sheffield, S4 7TL.

Pensions Ombudsman

The Pensions Ombudsman is an independent voluntary organisation which gives free help and advice to members and beneficiaries of occupational pension schemes in resolving difficulties with scheme trustees or administrators. The Pensions Ombudsman can be contacted at:

10 South Colonnade

Canary Wharf

London E14 4PU

Telephone: 0800 917 4487

Email: enquiries@pensions-ombudsman.org.uk

Website: www.pensions-ombudsman.org.uk

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Trustee's Report

Compliance Matters (continued)

Pension Protection Fund

The Pension Protection Fund ("PPF") was set up with effect from 6 April 2005. The PPF's main function is to provide compensation to members of eligible defined benefit pension schemes, when there is a qualifying insolvency event in relation to the employer, and where there are insufficient assets in the pension scheme to cover the PPF level of compensation. The PPF is funded by annual levies on all eligible defined benefit schemes.

The PPF levy consists of two parts: a Plan based levy based on the Plan's PPF liabilities, and a risk-based levy based on the level of underfunding in the Plan and the risk of the sponsoring employer becoming insolvent. The total levy which the PPF expects to raise in respect of UK pension schemes in the 2021/22 levy year is estimated at £520 million.

Pensions Regulator

The Pensions Regulator is able to intervene in the running of schemes where trustees, employers or professional advisers have failed in their duties.

The Pensions Regulator may be contacted at Telecom House, 125-135 Preston Road, Brighton, BN1 6AF.

Telephone: 0870 606 3636

Website: www.thepensionsregulator.gov.uk

Draft single code of Practice

The Pensions Regulator (tPR) released a consultation document on 17 March 2021 on the new Single Code of Practice (including a full draft of the Code). The new Code aims to bring together 10 of the 15 existing Codes of Practice, plus various pieces of existing guidance and new material required as a result of the 2018 Occupational Pension Schemes (Governance) regulations. The consultation closed in May 2021 and tPR have carried out a full review of the responses.

tPR has revealed that the consolidated single code of practice will be called the General Code and whilst they do not have a firm final publication date for the new code it is not expected to be published until autumn 2023 at the earliest.

The Trustee has started a review of the draft Code and will assess whether current governance practices meet tPR's new expectations once the new code becomes effective.

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Report on Actuarial Liabilities

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, assessed using the assumptions agreed between the Trustees and the Employer and set out in the Statement of Funding Principles, which is available to Plan members on request.

The most recent full actuarial valuation of the Plan was carried out as at 5 April 2021.

	Actuarial Valuation 5 April 2021
The value of the Technical Provisions was:	£324.4 million
The value of the assets at that date was:	£297.1 million
Funding level	92%

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 or 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 Plan's rules.

Pay increases: general pay increases of 1.5% per annum above 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 SIPMA 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.

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Contact for Further Information

Any enquiries or complaints about the Plan, including requests from individuals for information about their benefits or Plan documentation, should be sent to:

Trustee of the ACNielsen (UK) Pension Plan
c/o Sue Kettle
Capita Pension Solutions Limited
Hartshead House
2 Cutlers Gate
Sheffield
S4 7TL

Email: Nielsen@capita.co.uk

Approval of annual report

Signed on behalf of the ACNielsen (UK) Pension Plan, in their capacity as Trustee Directors of ACNielsen (UK) Pension Plan Trust Limited, by:

Chris Martin
.... **Date:** 25/10/2023 ....

Trustee Director

Mike Watkins
.... **Date:** 25/10/2023 ....

Trustee Director

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Actuary's Certification of the Schedule of Contributions

Name of scheme: **ACNielsen (UK) Pension Plan**

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 could have been expected on 5 April 2021 to be met by the end of the period specified in the recovery plan dated 29 April 2022.

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 29 April 2022.

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 Plan's liabilities by the purchase of annuities, if the Plan were to be wound up.

Signed Stephen Aries

Stephen Aries
Fellow of the Institute and Faculty of Actuaries
Towers Watson Limited, a WTW company

Watson House
London Road
Reigate
Surrey RH2 9PQ

Date 29 April 2022

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Actuary's Certification of Technical Provisions

Name of Plan: **ACNielsen (UK) Pension Plan**

Calculation of technical provisions

I certify that, in my opinion, the calculation of the Plan's technical provisions as at 5 April 2021 is made in accordance with regulations under section 222 of the Pensions Act 2004. The calculation uses a method and assumptions determined by the Trustee of the Plan and set out in the Statement of Funding Principles dated 29 April 2022.

Signed Stephen Aries

Stephen Aries
Fellow of the Institute and Faculty of Actuaries
Towers Watson Limited, a WTW company

Watson House
London Road
Reigate
Surrey RH2 9PQ

Date 29 April 2022

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Independent Auditor's Report to the Trustee of ACNielsen (UK) Pension Plan

Opinion

We have audited the financial statements of ACNielsen (UK) Pension Plan (the 'Plan') for the year ended 5 April 2023, which comprise the fund account, the statement of net assets (available for benefits) and notes to the financial statements, including a summary of significant accounting policies[1]. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including Financial Reporting Standard 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland' (United Kingdom Generally Accepted Accounting Practice).

In our opinion, the financial statements:

- show a true and fair view of the financial transactions of the Plan during the year ended 5 April 2023, and of the amount and disposition at that date of its assets and liabilities, other than liabilities to pay pensions and benefits after the end of the year;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- contain the information specified in Regulations 3 and 3A of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, made under the Pensions Act 1995.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the 'Auditor's responsibilities for the audit of the financial statements' section of our report. We are independent of the Plan in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

We are responsible for concluding on the appropriateness of the Trustee's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Plan's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify the auditor's opinion. Our conclusions are based on the audit evidence obtained up to the date of our report. However, future events or conditions may cause the Plan to cease to continue as a going concern.

In our evaluation of the Trustee's conclusions, we considered the inherent risks associated with the Plan including effects arising from macro-economic uncertainties such as Brexit and Covid-19, we assessed and challenged the reasonableness of estimates made by the Trustee and the related disclosures and analysed how those risks might affect the Plan's financial resources or ability to continue operations over the going concern period.

In auditing the financial statements, we have concluded that the Trustee's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

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Independent Auditor's Report to the Trustee of ACNielsen (UK) Pension Plan (continued)

Conclusions relating to going concern (continued)

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Plan's ability to continue as a going concern for a period of at least twelve months from when the financial statements are approved by the Trustee.

Our responsibilities and the responsibilities of the Trustee with respect to going concern are described in the relevant sections of this report.

Other information

The other information comprises the information included in the annual report, other than the financial statements and our auditor's report thereon. The Trustee is responsible for the other information contained within the annual report. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

Our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements themselves. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Responsibilities of Trustee

As explained more fully in the Trustee's responsibilities statement set out on page 36, the Trustee is responsible for the preparation of financial statements and for being satisfied that they give a true and fair view, and for such internal control as the Trustee determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Trustee is responsible for assessing the Plan's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Trustee either intends to wind up the Plan, or have no realistic alternative but to do so.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists.

Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. The extent to which our procedures are capable of detecting irregularities, including fraud, is detailed below:

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- We obtained an understanding of the legal and regulatory frameworks that are applicable to the Scheme and determined that the most significant are the Pensions Acts 1995 and 2004, and those that relate to

Independent Auditor's Report to the Trustee of ACNielsen (UK) Pension Plan (continued)

Auditor's responsibilities for the audit of the financial statements (continued)

the reporting frameworks (Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, Financial Reporting Standard 102 (FRS 102) and the Statement of Recommended Practice "Financial Reports of Pension Schemes" 2018 ("the SORP"). In addition, we concluded that there are certain significant laws and regulations that may have an effect on the determination of the amounts and disclosures in the financial statements such as the Pensions Regulator's Codes of Practice and relevant compliance regulations (including the Annual Pensions Bill and tax legislation) under which the Plan operates.

- We identified areas of laws and regulations that could reasonably be expected to have a material effect on the financial statements from our sector experience and through discussion with management, the Trustee, and from inspection of Trustee board minutes and legal and regulatory correspondence. We discussed the policies and procedures regarding compliance with laws and regulations with the Trustee.
- We assessed the susceptibility of the Plan's financial statements to material misstatement due to irregularities including how fraud might occur. We evaluated management's incentives and opportunities for manipulation of the financial statements and determined that the principal risks were in relation to the risk of management override of controls through posting inappropriate journal entries to manipulate results and net assets for the year.
- Our audit procedures involved:
    - journal entry testing, with a focus on large manual journals to unusual account codes, including:
        - manual journals with unusual account combinations such as those between the Fund Account and the Statement of Net Assets,
        - journals posted to suspense accounts, and,
        - journals with a blank description
- obtaining independent confirmations of material investment valuations and cash balances at the year end.

In addition, we completed audit procedures to conclude on the compliance of disclosures in the annual report and accounts with applicable financial reporting requirements.

These audit procedures were designed to provide reasonable assurance that the financial statements were free from fraud. However, detecting irregularities that result from fraud is inherently more difficult than detecting those that result from error, as those irregularities that result from fraud may involve collusion, deliberate concealment, forgery or intentional misrepresentations. Also, the further removed non-compliance with laws and regulations is from events and transactions reflected in the financial statements, the less likely we would become aware of it.

- All team members are qualified accountants or working towards that qualification and are considered to have sufficient knowledge and experience of Plans of a similar size and complexity, appropriate to their role within the team. The engagement team are required to complete mandatory pensions sector training on an annual basis, thus ensuring they have sufficient knowledge and of the sector the underlying applicable legislation and related guidance.

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A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Independent Auditor's Report to the Trustee of ACNielsen (UK) Pension Plan (continued)

Use of our report

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

Grant Thornton UK LLP

Grant Thornton UK LLP
Statutory Auditor, Chartered Accountants
Cardiff
Date: 25/10/2023

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Independent Auditor’s Statement about Contributions to the Trustee of ACNielsen (UK) Pension Plan

We have examined the summary of contributions to the ACNielsen (UK) Pension Plan (the ‘Plan’) in respect of the Plan year ended 5 April 2023 which is set out in the Trustee’s report on 6.

In our opinion, contributions for the Plan year ended 5 April 2023 as reported in the summary of contributions and payable under the Schedules of Contributions have in all material respects been paid at least in accordance with the Schedules of Contributions certified by the Plan actuary on 3 July 2019 and 29 April 2022.

Scope of work on statement about contributions

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 Schedules of Contributions. This includes an examination, on a test basis, of evidence relevant to the amounts of contributions payable to the Plan and the timing of those payments under the Schedules of Contributions.

Respective responsibilities of trustee and the auditor

As explained more fully in the Statement of Trustee’s Responsibilities set out on page 36, the Trustee is responsible for preparing, and from time to time reviewing and if necessary, revising a Schedule of Contributions and for monitoring whether contributions are made to the Plan by the employer in accordance with the Schedules of Contributions.

It is our responsibility to provide a statement about contributions paid under the Schedules of Contributions and to report our opinion to you.

Use of our statement

This statement is made solely to the Trustee, as a body, in accordance with the Pensions Act 1995 and Regulations made thereunder. Our work has been undertaken so that we might state to the Trustee those matters we are required to state to them 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 trustee as a body, for our work, for this statement, or for the opinions we have formed.

Grant Thornton UK LLP

Grant Thornton UK LLP
Statutory Auditor, Chartered Accountants
Cardiff
Date: 25/10/2023

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Fund Account

For the year ended 5 April 2023

	Note	Defined benefit section 2023 £	Defined contribution section 2023 £	Total 2023 £	Total 2022 £
Contributions and benefits					
Employer contributions	5	5,151,472	-	5,151,472	6,661,996
Other income	6	130	-	130	-
		5,151,602	**-**	**5,151,602**	6,661,996
Benefits paid or payable	7	(8,264,110)	-	(8,264,110)	(6,860,280)
Payments to and on account of leavers	8	(177,790)	(114,827)	(292,617)	(1,628,026)
Bulk transfers out	9	-	(6,783,566)	(6,783,566)	-
Administration expenses	10	(1,264,654)	-	(1,264,654)	(1,478,316)
		(9,706,554)	**(6,898,393)**	**(16,604,947)**	(9,966,622)
Net withdrawals from dealings with members		**(4,554,952)**	**(6,898,393)**	**(11,453,345)**	(3,304,626)
Returns on investments					
Investment income	11	7,891,787	**-**	7,891,787	16,865,465
Change in market value of investments	12	(66,536,383)	(2,245,220)	(68,781,603)	(11,414,551)
Investment management expenses	14	(143,141)	-	(143,141)	(185,020)
Net returns on investments		**(58,787,737)**	**(2,245,220)**	**(61,032,957)**	5,265,894
Net (decrease)/increase in the fund during the year		(63,342,689)	(9,143,613)	**(72,486,302)**	1,961,268
Inter section transfer		767,918	(767,918)	**-**	-
Net assets of the Plan at start of year		262,867,231	36,170,534	299,037,765	297,076,497
Net assets of the Plan at end of year		**200,292,460**	**26,259,003**	**226,551,463**	299,037,765

The accompanying notes on pages 51 to 66 form an integral part of these financial statements.

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Statement of Net Assets available for Benefits

As at 5 April 2023

	Note	Defined benefit section 2023 £	Defined contribution section 2023 £	Total 2023 £	Total 2022 £
Investment assets:					
Pooled investment vehicles	16	118,737,171	25,087,816	**143,824,987**	301,999,812
Insurance policies	17	80,100,000	-	**80,100,000**	-
AVC investments	12	241,089	1,164,292	**1,405,381**	1,583,235
Total		**199,078,260**	**26,252,108**	**225,330,368**	303,583,047
Investment liabilities:					
Other investments – amounts due to Broker	12	-	-	**-**	(4,606,193)
		-	**-**	**-**	(4,606,193)
Total net investments		**199,078,260**	**26,252,108**	**225,330,368**	298,976,854
Current assets	21	2,417,545	66,568	**2,484,113**	922,268
Current liabilities	22	(1,203,345)	(59,673)	**(1,263,018)**	(861,357)
Net assets of the Plan at end of year		**200,292,460**	**26,259,003**	**226,551,463**	299,037,765

The financial statements summarise the transactions of the Plan 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 Plan year. The actuarial position of the Plan, which considers such obligations for the defined benefit section, is dealt with in the Report on Actuarial Liabilities on page 40 and these financial statements should be read in conjunction with this report.

The accompanying notes on pages 51 to 66 form an integral part of these financial statements.

The financial statements on pages 49 to 66 were approved on behalf of ACNielsen (UK) Pension Plan Trust Limited on__________________________ 2023.

Signed on behalf of the ACNielsen (UK) Pension Plan Trust Limited.

Chris Martin
………………………………………………………………….. **Date:** 25/10/2023

Trustee Director

Mike Watkins
………………………………………………………………….. **Date:** 25/10/2023

Trustee Director

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Notes to the Financial Statements

1. Identification of the financial statements

The ACNielsen (UK) Pension Plan, registration number 10226893, is a trust scheme established under English Law, administered under a Definitive Trust Deed and Rules and closed to future accrual. The address for enquiries is Capita Pension Solutions Limited, Hartshead House, 2 Cutlers Gate, Sheffield, S4 7TL.

2. Basis of preparation

The individual financial statements of ACNielsen (UK) Pension Plan 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 (FRS) 102 – The Financial Reporting Standard applicable in the UK and Republic of Ireland issued by the Financial Reporting Council ("FRS 102") and the guidance set out in the Statement of Recommended Practice "Financial Reports of Pension Schemes" (Revised 2018) ("the SORP").

The financial statements are prepared on a going concern basis, which the Trustee believes to be appropriate as they believe that the Plan has adequate resources to realise its assets and meet pension payments in the normal course of affairs (continue to operate) for at least twelve months post signing.

3. Accounting policies

The principal accounting policies of the Plan are as follows:

Contributions

Employer deficit funding and additional contributions are accounted for on the due dates on which they are payable under the Schedule of Contributions or on receipt if earlier with the agreement of the employer and Trustee.

Payments to members

Benefits and any associated taxation 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, on the date of retiring or leaving.

Pensions in payment are accounted for in the period to which they relate.

Individual transfers out of the Plan are accounted for when member liability is discharged, which is normally when the transfer amount is paid.

Group transfers are accounted for in accordance with the terms of the transfer agreement.

Expenses

Expenses are accounted for on an accruals basis.

Investment income

Income from cash and short-term deposits is accounted for on an accruals basis.

Income from pooled investment vehicles which distribute income is accounted for when declared by the fund manager. Investment income, which is not distributed, arising from the underlying investment of pooled investment vehicles is reinvested and reflected in the unit price. It is reported within the change in market value.

Receipts from annuity policies are accounted for as investment income on an accruals basis.

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Notes to the Financial Statements

3. Accounting policies (continued)

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.

Investments are included at fair value as described below:

Unitised pooled investment vehicles have been valued at the latest available bid price or single price provided by the pooled investment manager. Shares in other pooled arrangements have been valued at the latest available net asset value (NAV), determined in accordance with fair value principles, provided by the pooled investment manager.

The Trustee holds insurance policies that secure pensions payable to specified beneficiaries. These policies remain assets of the Plan and do not make allowances for GMP. They are valued by the Plan Actuary at the amount of the related obligations using actuarially determined discounting over the projected lifetime remaining of policy holders modelled on a buy-out basis. This is appropriate as the Plan is fully insured, the technical provisions basis will equate to a full buy-in, which does not differ from a buy-out.

Critical accounting judgements and estimation uncertainty

The Trustee makes estimates and assumptions concerning the future. The accounting estimates will, by definition, seldom equal the related actual results. For the Plan, the Trustee believes the only estimates and assumptions that have a significant risk of causing a material adjustment to the carrying amount of assets and liabilities within the next financial year are related to the valuation of the Plan's bulk buy-in policy, valued by the Plan Actuary.

Presentation currency

The Plan's functional and presentation currency is pounds sterling. Monetary items denominated in foreign currency are translated into sterling using the closing exchange rates at the Plan year end. Foreign currency transactions are recorded in sterling at the spot exchange rate at the date of the transaction.

Annuity policies

Under FRS 102 annuity policies are reported at the value of the related obligation to pay future benefits funded by the annuity policy.

The Trustee has determined that there are no material annuity policies held in the name of the Trustee.

Notes to the Financial Statements

4. Comparative disclosures for the Fund Account and Statement of Net Assets

Fund Account

	Note	Defined benefit section 2022 £	Defined contribution section 2022 £	Total 2022 £
Contributions and benefits				
Employer contributions	5	6,661,996	-	6,661,996
		6,661,996	-	6,661,996
Benefits paid or payable	7	(6,829,661)	(30,619)	(6,860,280)
Payments to and on account of leavers	8	(1,363,903)	(264,123)	(1,628,026)
Administration expenses	10	(1,478,316)	-	(1,478,316)
		(9,671,880)	(294,742)	(9,966,622)
Net withdrawals from dealings with members		(3,009,884)	(294,742)	(3,304,626)
Returns on investments				
Investment income	11	16,865,465	-	16,865,465
Change in market value of investments	12	(14,610,366)	3,195,815	(11,414,551)
Investment management expenses	14	(185,020)	-	(185,020)
Net returns on investments		2,070,079	3,195,815	5,265,894
Net (decrease)/increase in the fund during the year		(939,805)	2,901,073	1,961,268
Inter section transfer		621,523	(621,523)	-
Net assets of the Plan at start of year		263,185,513	33,890,984	297,076,497
Net assets of the Plan at end of year		262,867,231	36,170,534	299,037,765

Notes to the Financial Statements

4. Comparative disclosures for the Fund Account and Statement of Net Assets (continued)

Statement of Net Assets available for Benefits

	Note	Defined benefit section 2022 £	Defined contribution section 2022 £	Total 2022 £
Investment assets:				
Pooled investment vehicles	16	267,218,525	34,781,287	301,999,812
Insurance policies	17	-	-	-
AVC investments	12	265,134	1,318,101	1,583,235
Total		267,483,659	36,099,388	303,583,047
Investment liabilities:				
Other investments – amounts due to				
Broker	12	(4,606,193)	-	(4,606,193)
		(4,606,193)	-	(4,606,193)
Total net investments		262,877,466	36,099,388	298,976,854
Current assets	21	744,396	177,872	922,268
Current liabilities	22	(754,631)	(106,726)	(861,357)
Net assets of the Plan at end of year		262,867,231	36,170,534	299,037,765

5. Contributions

	2023 Defined benefit section £	2023 Defined contribution section £	2023 Total £
Employer contributions			
Deficit funding	3,671,472	-	3,671,472
Additional	1,480,000	-	1,480,000
	5,151,472	**-**	**5,151,472**

	2022 £	2022 £	2022 £
Employer contributions			
Deficit funding	5,181,996	-	5,181,996
Additional	1,480,000	-	1,480,000
	6,661,996	-	6,661,996

Contributions have been received in accordance with the Schedules of Contributions certified by the Plan actuary on 3 July 2019 and 29 April 2022.

Notes to the Financial Statements

5. Contributions (continued)

The Plan was closed to the accrual of future benefits with effect from 1 April 2016.

Deficit funding contributions are to improve the Plan's funding position in accordance with the recommendations of the Actuary. The Schedule of Contributions certified by the Actuary on 29 April 2022 states that the deficit funding contributions would be £3,671,472 per year, subject to the annual inflation adjustment from 1 April 2023, payable in monthly instalments from April 2022 to May 2028.

The Employer is also required to pay £40,000 per month for administration expenses.

Additional contributions of £1,000,000 a year are payable from 2021 to 2025.

6. Other income

	2023 Defined benefit section £	2023 Defined contribution section £	2023 Total £
Compensation	**130**	**-**	**130**

	2022 £	2022 £	2022 £
Compensation	-	-	-

7. Benefits paid or payable

	2023 Defined benefit section £	2023 Defined contribution section £	2023 Total £
Pensions	6,099,823	-	6,099,823
Commutations of pensions and lump sum retirement benefits	2,058,592	-	2,058,592
Lump sum death benefits	8,886	-	8,886
Open market options	96,809	-	96,809
	8,264,110	**-**	**8,264,110**

	2022 £	2022 £	2022 £
Pensions	5,757,768	-	5,757,768
Commutations of pensions and lump sum retirement benefits	732,278	30,619	762,897
Lump sum death benefits	144,431	-	144,431
Open market options	195,184	-	195,184
	6,829,661	30,619	6,860,280

Notes to the Financial Statements

8. Payments to and on account of leavers

	2023 Defined benefit section £	2023 Defined contribution section £	2023 Total £
Individual transfers to other schemes	**177,790**	**114,827**	**292,617**

	2022 £	2022 £	2022 £
Individual transfers to other schemes	1,363,903	264,123	1,628,026

9. Transfers out

	2023 Defined benefit section £	2023 Defined contribution section £	2023 Total £
Bulk transfers out	**-**	**6,783,566**	**6,783,566**

Bulk transfers out comprise the transfer of 242 members' benefits to the Fidelity Master Trust completed on the 24 June 2022. The transfer involved an in-specie transfer of assets from Aviva. All members were advised by the Trustee that the buy-out had taken place and Fidelity has now issued individual annuity policies to all Plan members concerned.

10. Administration expenses

	2023 Defined benefit section £	2023 Defined contribution section £	2023 Total £
External actuarial, consultancy & administration	1,103,010	-	1,103,010
Audit fees	15,000	-	15,000
Legal fees	134,600	-	134,600
Miscellaneous	2,736	-	2,736
PPF levy	9,308	-	9,308
	1,264,654	**-**	**1,264,654**

	2022 £	2022 £	2022 £
External actuarial, consultancy & administration	1,405,333	-	1,405,333
Audit fees	21,913	-	21,913
Legal fees	39,251	-	39,251
Miscellaneous	11,819	-	11,819
	1,478,316	-	1,478,316

All other costs of administration are borne by the Employer.

The PPF levy charge in the current year relates to the reversal of a debtor provision included since 2010.

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Notes to the Financial Statements

11. Investment income

	2023 Defined benefit section £	2023 Defined contribution section £	2023 Total £
Annuity income	1,314,162	-	1,314,162
Income from pooled investment vehicles	6,575,103	-	6,575,103
Interest on cash deposits	2,522	-	2,522
	7,891,787	**-**	**7,891,787**

	2022 £	2022 £	2022 £
Annuity income	24,162	-	24,162
Income from pooled investment vehicles	16,841,303	-	16,841,303
	16,865,465	-	16,865,465

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

	Value at 6 April 2022 £	Purchases at cost £	Sales proceeds £	Change in market value £	Value at 5 April 2023 £
Defined Benefit Section					
Pooled investment vehicles	267,218,525	468,520,242	(541,193,315)	(75,808,281)	**118,737,171**
Insurance policies	-	70,838,402	-	9,261,598	**80,100,000**
AVC investments	265,134	-	(34,345)	10,300	**241,089**
	267,483,659	539,358,644	(541,227,660)	(66,536,383)	**199,078,260**
Other investments – amounts due to brokers	(4,606,193)				-
	262,877,466				**199,078,260**

	Value at 6 April 2022 £	Purchases at cost £	Sales proceeds £	Change in market value £	Value at 5 April 2023 £
Defined Contribution Section					
Pooled investment vehicles	34,781,287	121,101	(7,723,161)	(2,091,411)	**25,087,816**
AVC investments	1,318,101	-	-	(153,809)	**1,164,292**
	36,099,388	121,101	(7,723,161)	(2,245,220)	**26,252,108**

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Notes to the Financial Statements

12. Reconciliation of investments held at the beginning and end of the year (continued)

AVC investments

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

Defined Benefit Section	**2023**	**2022**
	£	**£**
Aviva	**241,089**	265,134

Defined Contribution Section	**2023**	**2022**
	£	**£**
Aviva	**1,164,292**	1,318,101

Transaction costs

Transaction costs are included in the cost of purchases and sale proceeds. Direct transaction costs include costs charged to the Plan such as fees, commissions and stamp duty. There were no such costs incurred during the year.

In addition to the transaction costs described above, indirect costs are incurred through the bid-offer spread on investments within pooled investment vehicles. The amount of indirect transaction costs are not separately provided to the Plan.

Defined Contribution Section

For the Defined Contribution section, investments purchased by the Plan are allocated to provide benefits to the individuals on whose behalf corresponding contributions are paid. The investment manager holds the investment units on a pooled basis for the Trustee. The Plan administrator allocates investment units to members.

The Trustee may hold investment units representing the value of employer contributions that have been retained by the Plan that relate to members leaving the Plan prior to vesting. Members receive an annual statement confirming contributions paid on their behalf and the value of their money purchase rights.

All Defined Contribution section assets are allocated to members.

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Notes to the Financial Statements

13. Concentration of investments

The following DB section investments were valued in excess of 5% of the net assets of the Plan at 5 April 2023.

	£	2023 %	£	2022 %
WTW – Sterling Z Shares	35,448,261	**15.6**	76,969,620	28.7
WTW – Core Diversified Fund	-	**-**	41,560,518	13.9
Insight – Liquidity Holding Fund Class 2	26,866,794	**11.8**	10,772,210	3.6
Insight – Fiduciary Leveraged Long Fixed Fund	24,369,677	**10.7**	23,290,347	7.8
Insight – Fiduciary Leveraged Long Real Fund	12,985,324	**5.7**	5,133,060	1.7
Insight – Fiduciary Leveraged Short Real Fund	13,290,189	**5.9**	20,133,777	6.7
Insight – Liquidity Fund	3,633,521	**1.6**	85,454,145	28.6
Aviva – insurance policies	80,100,000	**35.2**	-	-

The following DC section investments were valued in excess of 5% of the net assets of the Plan at 5 April 2023.

	£	2023 %	£	2022 %
Legal & General – Global Equity MW (30:70) Index Fund	24,029,161	**10.6**	25,359,526	8.5

14. Investment management expenses

	2023 Defined benefit section £	2023 Defined contribution section £	2023 Total £
Administration, management and custody	**143,141**	**-**	**143,141**

	2022 £	2022 £	2022 £
Administration, management and custody	185,020	-	185,020

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Notes to the Financial Statements

15. Taxation

The Plan is a registered Pension Scheme under Chapter 2 of Part 4 of the Finance Act 2004 and is therefore exempt from income tax and capital gains tax.

16. Pooled investment vehicles

The Plan's investments in pooled investment vehicles at the year-end comprised:

Defined Benefit Section	**2023 £**	**2022 £**
Multi-asset Fund (WTW)	35,448,261	118,530,138
Insight Downside Risk Hedge	2,143,405	290,406
LDI Funds (Insight)	81,145,505	148,397,981
	118,737,171	267,218,525

Defined Contribution Section	**2023 £**	**2022 £**
UK Equities	-	1,446,373
Overseas Equities	-	4,908,184
Fixed Interest Bonds	-	618,092
Index-Linked Gilts	-	910,975
Global Equity MW (30:70) Ind Fund	24,029,161	25,359,526
Future World Inflation Linked Annuity Aware Fund	1,058,655	1,538,137
	25,087,816	34,781,287

The pooled investment vehicles are managed by companies registered in the UK.

17. Insurance policies

On 23 December 2022 the Trustee entered into a buy-in agreement with Aviva Life & Pensions UK Limited to secure some benefits accrued within the DB section of the Scheme for a premium of £70,838,402. As at year end the value of the buy-in agreement is as follows:

	2023 £'000	**2022 £'000**
Aviva – insurance policies	**80,100,000**	**-**

18. Fair value determination

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

Level 1	The unadjusted quoted price in an active market for identical assets or liabilities that the entity can access at the assessment dates.
Level 2	Inputs other than quoted prices included within Level 1 which are observable (i.e. developed) 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.

Notes to the Financial Statements

18. Fair value determination (continued)

The Plan's investment assets and liabilities have been fair valued using the above hierarchy levels as follows:

As at 5 April 2023	**Level 1 £**	**Level 2 £**	**Level 3 £**	**Total £**
Defined Benefit Section				
Pooled investment vehicles	-	83,288,910	35,448,261	118,737,171
AVC investments	-	241,089	-	241,089
Insurance policies	-	-	80,100,000	80,100,000
	-	**83,529,999**	**115,548,261**	**199,078,260**
Defined Contribution Section				
Pooled investment vehicles	-	25,087,816	-	25,087,816
AVC investments	-	1,164,292	-	1,164,292
	-	**26,252,108**	**-**	**26,252,108**

As at 5 April 2022	**Level 1 £**	**Level 2 £**	**Level 3 £**	**Total £**
Defined Benefit Section				
Pooled investment vehicles	-	148,688,387	118,530,138	267,218,525
AVC investments	-	265,134	-	265,134
Other investments	-	(4,606,193)	-	(4,606,193)
	-	144,347,328	118,530,138	262,877,466
Defined Contribution Section				
Pooled investment vehicles	-	34,781,287	-	34,781,287
AVC investments	-	1,318,101	-	1,318,101
	-	36,099,388	-	36,099,388

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19. Investment risk disclosures

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 of 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 of 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 of 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 Trustees determine their investment strategy after taking advice from a professional investment adviser. The Plan has exposure to these risks because of the investments it makes in following the investment strategy set out below. The Trustees delegate the management of investment risks to the Plan's Fiduciary Manager, including credit risk and market risk, within agreed guidelines which are set taking into account the Plan's strategic investment objectives. These investment objectives and guidelines are monitored by the Trustees by regular reviews of the investment portfolio.

Further information on the Trustees' approach to risk management, credit and market risk is set out below. This does not include any legacy insurance policies nor AVC investments as these are not considered significant in relation to the overall investments of the Plan.

Defined Benefit Section

The investment objectives are:

- The acquisition of suitable assets of appropriate liquidity which will generate income and capital growth to meet, together with new contributions from the Employer, the cost of current and future benefits which the Plan provides.
- To limit the risk of the assets failing to meet the liabilities, both over the long-term and on a shorter-term basis.
- To minimise the long-term costs of the Plan by maximising the return on the assets whilst having regard to the objective shown under the point above.

The Trustees set the investment strategy taking into account considerations such as the strength of the employer covenant, the long-term liabilities of the Plan 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 target a return of 0.8% pa above gilt based liabilities which corresponds approximately to a benchmark allocation of:

Asset class	**Benchmark weight (%)**
Multi-asset funds (return-seeking assets)	13.7
Liability driven investments & cash (matching assets)	49.3
Buy-in policy with Aviva	37.0
	100.0

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Notes to the Financial Statements

19. Investment risk disclosures (continued)

Credit risk

The Plan invests in pooled investment vehicles and is therefore indirectly exposed to credit risk in relation to the instruments it holds in the pooled investment vehicles. The Plan is also indirectly exposed to credit risks arising on the financial instruments held by the pooled investment vehicles.

Credit risk arising on derivatives (which are used in the pooled LDI funds in which the Plan invests) 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 Plan is subject to risk of failure of the counterparty. The credit risk for OTC swaps is reduced by collateral arrangements.

Cash is held within financial institutions which are at least investment grade credit rated. This is the position at the year-end.

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 Fiduciary Manager carries out due diligence checks on the appointment of new pooled investment managers and on an ongoing basis monitors any changes to the operating environment of the pooled manager.

The Plan also has credit risk due to the buy-in that was undertaken with Aviva in December 2022. In undertaking the buy-in, the Trustee undertook an assessment of the security of the UK insurance protection regime and Aviva's capitalisation compared to peers.

As at 5 April 2023, the Plan's total exposure to credit risk was £166,066,468.

Legal nature of the pooled arrangements

	2023 £	2022 £
Open-ended investment company	118,737,171	267,218,525

Currency risk

The Plan has an allocation to overseas assets through the multi-asset funds of Towers Watson Investment Management. However, the currency risks are mitigated through a degree of currency hedging, which is subject to the managers' discretion.

As at 5 April 2023, the Plan's total exposure to currency risk was £14,248,461.

Interest rate risk

The Plan is subject to interest rate risk because some of the Plan's investments are held in bonds and interest rate swaps, through the pooled investment vehicles, and cash. The Trustees have set a return target which broadly corresponds to a benchmark allocation in these assets of 49.3% of the total investment portfolio, as part of their LDI investment strategy. Under this strategy, if interest rates fall, the value of LDI investments will rise to help match the increase in actuarial liabilities arising from a fall in the discount rate. Similarly, if interest rates rise, the LDI investments will fall in value, as will the actuarial liabilities because of an increase in the discount rate. At the year-end the LDI and cash portfolios represented approximately 40.8% of the total investment portfolio. The Plan also has additional exposure to bonds through pooled investments within the return-seeking allocation.

As at 5 April 2023, the Plan's total exposure to interest rate risk was £85,328,400.

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19. Investment risk disclosures (continued)

Other price risk

Other price risk arises principally in relation to the Plan's multi-asset return-seeking portfolio. The Plan's return target corresponds to an asset allocation of 13.7% of investments being held in return-seeking investments. At year end the allocation to return-seeking investments represents 18.9% of the total investment portfolio.

The Plan manages this exposure to overall price movements by constructing a diverse portfolio of investments across various markets.

As at 5 April 2023, the Plan's total exposure to other price risk was £37,591,666.

Defined Contribution Section

The Trustee seeks to offer members funds that acquire secure assets of appropriate liquidity and diversification, which will generate income and capital growth which will provide a fund at retirement with which to provide retirement benefits (be that by purchase of a pension annuity or by some other means – income drawdown for example).

The investment funds available to members are provided by Legal & General Investment Management ("LGIM") and Aviva. Full details of the investment funds are contained in the Plan's Statement of Investment Principles (SIP) which is included with this report.

The risks disclosed here relate to the DC sections' investments as a whole. Members in the Plan's AVC arrangement (held with Aviva) are able to choose their own investments from the range of funds offered by the Trustees and therefore may face a different profile of risks from their individual choices compared with the DC sections' investments as a whole. There is only one investment option available in the old Money Purchase section (held with LGIM) and all benefits in the new Money Purchase section were transferred out of this section to the Fidelity Master Trust on 22 June 2022.

Credit risk

The Plan is subject to direct credit risk through its holding in pooled investment vehicles (accessed through insurance funds) provided by LGIM and Aviva. 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/provider, the regulatory environments in which the pooled managers/providers operate and diversification of investments amongst a number of pooled arrangements. The Trustees carry out due diligence checks on the appointment of new pooled investment managers and monitor them (with assistance from their investment adviser).

Legal nature of the pooled arrangements

	2023 £	2022 £
Open-ended investment company	34,781,287	25,087,816

Market risk

The Plan is subject to indirect foreign exchange, interest rate and other price risk arising from the underlying financial instruments held in the funds.

Fund	Exposed to:	Currency Risk	Interest rate risk	Other price risk
Equity funds		✓	-	✓
Bond funds		✓	✓	-

Notes to the Financial Statements

20. Employer related investment

There have been no employer related investments within the meaning of Section 40 of the Pensions Act 1995 during the year ended 5 April 2023 (2022: Nil).

21. Current assets

	2023 Defined benefit section £	2023 Defined contribution section £	2023 Total £
Debtors and prepayments	-	43,229	43,229
Cash balances	2,417,438	23,339	2,440,777
Cash deposits held with the Plan Administrator	107	-	107
	2,417,545	**66,568**	**2,484,113**

	2022 £	2022 £	2022 £
Debtors and prepayments	56,360	111,101	167,461
Cash balances	687,929	66,771	754,700
Cash deposits held with the Plan Administrator	107	-	107
	744,396	177,872	922,268

All Defined contribution section cash balances are allocated to members.

22. Current liabilities

	2023 Defined benefit section £	2023 Defined contribution section £	2023 Total £
Benefits payable	188,706	20	188,726
Accrued expenses	454,288	-	454,288
State scheme premiums	7,922	9,160	17,082
Tax due to HMRC	72,999	10,240	83,239
Prepaid annuity income	438,000	-	438,000
Other creditors	41,429	40,253	81,682
	1,203,344	**59,673**	**1,263,017**

	2022 £	2022 £	2022 £
Benefits payable	164,014	20	164,034
Accrued expenses	473,261	-	473,261
State scheme premiums	7,922	9,160	17,082
Tax due to HMRC	68,005	10,240	78,245
Prepaid annuity income	-	-	-
Other creditors	41,429	87,306	128,735
	754,631	106,726	861,357

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Notes to the Financial Statements

23. Related party transactions

Key management personnel of the entity

Richard Cowdrey, Michael Watkins, and Jocelyn Colyer, who were Directors of the Trustee Company during the Plan year were members of the Plan during the Plan year, accruing benefits in line with the Trust Deed and Rules.

Entities with control, joint control or significant influence over the entity

Certain administration expenses are borne by the Principal Employer. At the year-end a balance of £nil (2022: £9,308) was owed by the Principal Employer to the Plan in respect of historical administration fees paid from the Plan.

Administration expenses are paid initially by the employer and the recharged to the Plan. During the year £1,288,699 was recharged (2022: £1,544,059). At the year-end £376,130 was due from the Plan to the employer (2022: £444,628).

24. Contingent liabilities

As explained on page 5 of the Trustee's report, on 26 October 2018, the High Court handed down a judgment involving the Lloyds Banking Group's defined benefit pension schemes. The judgment concluded the schemes should be amended to equalise pension benefits for men and women in relation to guaranteed minimum pension benefits. The issues determined by the judgment arise in relation to many other defined benefit pension schemes.

The High Court has since determined that trustees owed a duty to a transferring member to make a transfer payment which reflected the member's right to equalised benefits. Where the initial transfer payment was inadequate on this basis the trustee is under an obligation to make a top-up payment to the receiving scheme on behalf of the transferred member.

The Trustee of the Plan is aware that the issue will affect the Plan and will be considering this at a future meeting and decisions will be made as to the next steps. Under the ruling schemes are required to backdate benefit adjustments in relation to GMP equalisation and provide interest on the backdated amounts.

Based on an initial assessment of the likely backdated amounts and related interest the trustee does not expect these to be material to the financial statements, although there is no reliable estimate at this stage, and therefore have not included a liability in respect of these matters in these financial statements. Amounts will be accounted for in the year they are determined.

The Virgin Media Ltd v NTL Pension Trustees II decision, handed down by the High Court on 16 June 2023, considered the implications of section 37 of the Pension Schemes Act 1993. We do not know at this stage whether the case will be appealed but, as matters stand, the case has the potential to cause significant issues in the pensions industry. The Trustee will investigate the possible implications with their advisers but, it is not possible at present to estimate the potential impact, if any, on the Plan.