

**Abbey Life Assurance Company Limited
Staff Pension Scheme**

**Chairman's Statement
For the year to 31st March 2022**

ABBEY LIFE ASSURANCE COMPANY LIMITED STAFF PENSION SCHEME

CHAIRMAN'S STATEMENT for the year to 31st March 2022

Annual Chairman's Statement for the Abbey Life Assurance Company Limited Staff Pension Scheme

The Occupational Pension Schemes (Scheme Administration) Regulations 1996 ("the Administration Regulations") require the Trustee to prepare an annual statement regarding governance of the Scheme's 'DC' funds – which must be included in the annual Trustee report and accounts.

This statement issued by the Trustee covers the period from 1 April 2021 to 31 March 2022, and is signed on behalf of the Trustee by the Chairman.

This statement covers governance and charge disclosures in relation to the following:

1. The default arrangement;
2. Net investment returns;
3. Processing of core financial transactions;
4. Member borne charges and transaction costs –
 - i. Default arrangement and self-select funds;
 - ii. Illustrations of the cumulative effect of these costs and charges;
5. Value for Members; and
6. Trustee knowledge and understanding.

1. The Default Arrangement

The Scheme is not, and has never been, used as a Qualifying Scheme for auto-enrolment purposes, and no contributions have been paid to the DC arrangements since the Administration Regulations came into force. However, the Standard Life Deposit and Treasury Fund is used by the Trustee to invest funds not designated to Members, and to invest the proceeds arising from any fund closures or transfers in. We have therefore treated the Standard Life Deposit and Treasury Fund as a default arrangement for the purposes of this statement.

A default investment arrangement is provided for Members who have made no specific investment instruction or for whom the Trustee may hold unallocated funds from time to time. Members can also choose to invest in the default investment arrangement which is set up by the Trustee.

The objective of the Default Investment arrangement is defined in the Statement of Investment Principles for the default arrangement (Default Arrangement SIP) as *"an Investment Vehicle with an investment objective which aims to preserve capital whilst aiming to provide a return on investments similar to that which might be achieved on cash deposits in a bank or building society or money market funds"*.

The Trustee's objectives regarding the default arrangement are therefore to broadly aim to provide capital preservation whilst achieving cash deposit returns before the application of charges. Further details are included within the Default Arrangement SIP.

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The Trustee undertakes a review of the funds available to Members every three years. This review includes a review of the performance of the default arrangement to ensure that the Standard Life Deposit and Treasury Fund is performing in line with its intended objective. The Trustee did not undertake a review during this reporting period. The last review took place on 21 August 2020 and the next formal review of the default arrangement will be carried out by 21 August 2023.

2. Net investment returns

The Trustee is required to report on net investment returns for each default arrangement and for each non-default fund that Members were invested in during the Scheme year. Net investment return refers to the returns on funds minus all member-borne transaction costs and charges (see section 4).

The net investment returns have been prepared having regard to statutory guidance. It is important to note that past performance is not a guarantee of future performance.

Performance to 31 March 2022	Annualised returns (%)	
	1 year	5 years
Scottish Widows		
Building Society	-1.1	-0.8
Consensus	8.5	4.4
Indexed Stock	1.6	1.7
Mixed	6.9	4.0
Property	21.5	6.6
SW Abbey Retirement Fund (ARF)	4.3	3.8
Standard Life		
Deposit and Treasury (default)	-1.4	-1.2
Managed	-1.5	-1.1
Money Market	-0.8	-0.4

Source: providers

3. Processing of Core Financial Transactions

The Trustee has a specific duty to ensure that core financial transactions (including the transfer of Member assets out of the Scheme, transfers between different investments within the Scheme, and payments to and in respect of Members), are processed promptly and accurately. The Trustee includes, but does not limit, the following as the Scheme's core financial transactions:

- *transfer of Member assets into and out of the Scheme;*
- *transfer of assets between different investments within the Scheme; and,*
- *payments to and in respect of Members.*

The core financial transactions are undertaken on the Trustee's behalf by EQ, who provide the administration services for the DC Section of the Scheme (this includes AVCs).

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A Service Level Agreement (SLA) with EQ is included in the contract with them and is updated as needed to ensure that it is fit for purpose and reflects the Trustee's needs. The SLA covers the accuracy and timeliness of all core financial transactions including time-critical processes (claims and non-claims) and manual administration activities. The turnaround times set within the SLA vary depending on the nature of the activity, ranging from 2 business days to 10 business days. The Trustee regularly monitors the performance via the quarterly administration reports prepared by EQ. EQ reported that SLAs averaged 99.8% for the four quarters from 1 April 2021 to 31 March 2022.

As part of their checking process, EQ carry out monthly checks, in addition to daily reconciliation of the Trustee's bank account. All investment and banking transactions are also checked and verified before being processed. All work processes are documented and subject to a peer review process, with work being calculated and independently checked by another member of the team. A regular review process also involves EQ providing quarterly core financial transaction metrics to the Trustee to review at its regular meetings, compared to target processing times.

The Trustee has reviewed the processes and controls implemented by EQ and considers them to be suitably designed and meeting required levels. Controls around administration and the processing of transactions are documented in the Scheme risk register, which is regularly reviewed.

There have been no administration service issues with respect to core financial transactions, which need to be reported. The service levels reported by EQ were at a level deemed acceptable by the Trustee and there were no concerns raised.

The fund platform and AVC providers used by the Scheme interact with the administrator in relation to core financial transactions and provide additional information on their processes and transactions as required. The Trustee expects to be notified by EQ of any delays or errors encountered in the processing of core financial transactions relating to AVCs.

In light of the above, the Trustee is satisfied that there are processes in place to ensure that all core financial transactions for the DC Section are processed in an accurate and timely manner and that all core financial transactions have been processed promptly and accurately during this Scheme year.

4. Member Borne Charges and Transaction costs

The Trustee should regularly monitor the level of charges and costs borne by Members through the investment funds. These charges comprise:

- Charges: these are explicit, and represent the costs associated with operating and managing an investment fund. They are identified here as the Total Expense Ratio (TER); and
- Transaction costs: these are not explicit and are incurred when the Scheme's fund manager buys and sells assets within investment funds.

The Trustee is also required to produce an illustration of the cumulative effect of the costs and charges over time on Members' fund values as required by the Occupational Pension Schemes (Administration and Disclosure) (Amendment) Regulations 2018.

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(i) Default arrangement and self-select investment funds

A full list of the TERs and applicable transaction costs is contained in the tables below.

Scottish Widows

Fund Name (6 available funds)	Total Expense Ratio (% p.a.)	Transaction Costs (% p.a.)
Building Society	0.00%	0.324%
Consensus	0.00%	0.07%
Indexed Stock	0.00%	0.14%
Mixed	0.48%	0.12%
Property	0.32%	0.00%
SW Abbey Retirement Fund (ARF) ¹	0.28%	0.14%

Source: Scottish Widows

¹Source: Phoenix Life

It is worth noting that Members receive a reduction in Annual Management Charges of 1% p.a. for the Scottish Widows funds. This has been reflected in the charges shown in the table above.

Standard Life

Fund Name (3 available funds)	Total Expense Ratio (%)²	Transaction Costs (% p.a.)
Deposit and Treasury ¹	0.61%	0.02%
Managed	0.62%	0.12%
Money Market	0.61%	0.00%

Source: Standard Life

¹The Scheme's default arrangement

It is worth noting that Members receive a 0.40% p.a. reduction from the TER for the Standard Life funds. This has been reflected in the charges shown in the above table

(i) Illustrations of the cumulative effect of costs and charges

In order to help Members understand the impact that costs and charges can have on their retirement savings, the Trustee has provided 2 illustrations of their cumulative effect on the value of typical scheme Members' savings over the period to their retirement.

The illustrations have been prepared having regard to statutory guidance, selecting suitable representative Members, and are based on a number of assumptions about the future which are set out in the notes below the illustration tables.

Members should be aware that such assumptions may or may not hold true, so the illustrations do not promise what could happen in the future and fund values are not guaranteed. Furthermore, because the illustrations are based on typical Members of the Scheme, they are not a substitute for the individual and personalised illustrations which are provided to Members in their annual Benefit Statements.

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The illustrations provided

Each of the tables below illustrate the potential impact that costs and charges might have on different investment options provided by the Scheme. Not all investment options are shown in the illustrations.

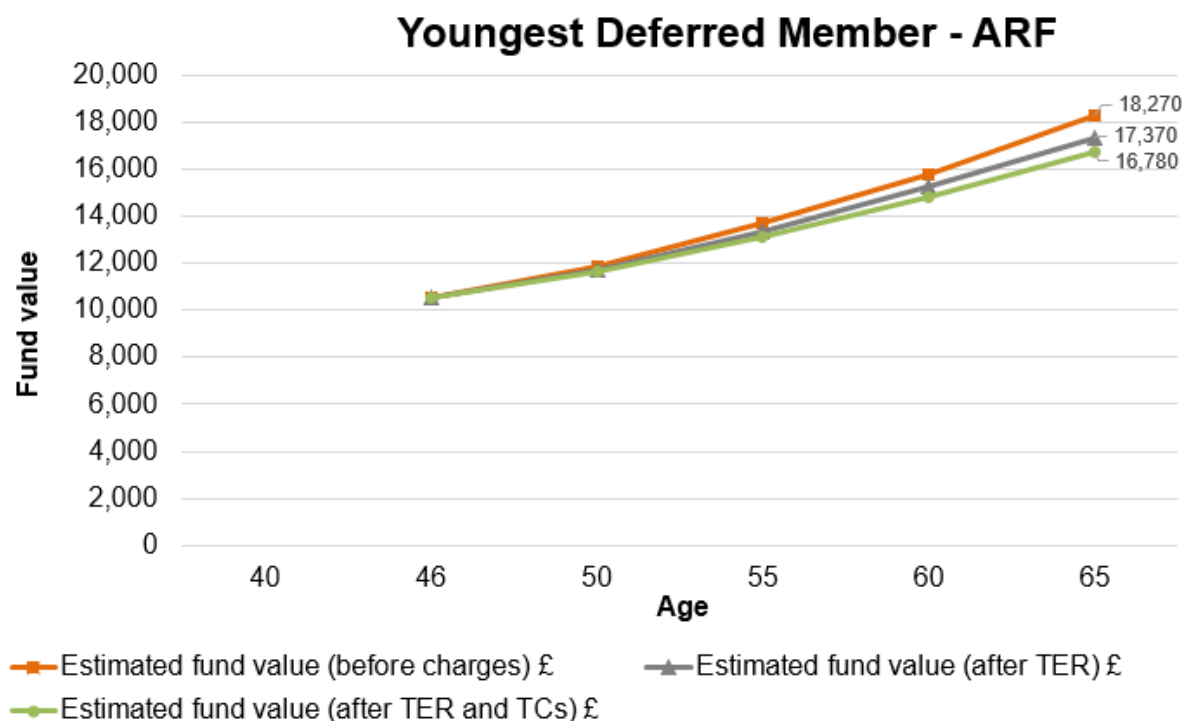
The Trustee has chosen to illustrate the potential impact that costs and charges might have if the 2 example Members were invested in the Standard Life Deposit and Treasury Fund (the default arrangement), the Scottish Widows Abbey Retirement Fund (the most popular arrangement), the Standard Life Managed Fund (the most expensive fund), and the Scottish Widows Consensus Fund (the least expensive fund).

The Trustee has determined the example Members for whom illustrations have been provided as 1, the youngest deferred member, and 2, a deferred Member of average age (ages determined using data for the Scheme). The fund values chosen for the illustrations were based on the actual member pot sizes.

Members are advised to consider both the level of costs and charges and the expected return on assets (i.e. the risk profile of the strategy) in making investment decisions.

Example member 1

The illustration below is based on a Deferred Member, 19 years from normal retirement at age 65, with a current fund value of £10,560 and no further contributions. The table highlights the cumulative effect of costs and charges on the member's fund value for an investment in the default arrangement (the Standard Life Deposit and Treasury Fund), the Scottish Widows Abbey Retirement Fund (the most popular fund), the Standard Life Managed Fund (the most expensive fund), and the Scottish Widows Consensus Fund (the least expensive fund).



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	Standard Life Deposit and Treasury Fund (the Default Arrangement)			Scottish Widows Abbey Retirement Fund (ARF) (the most popular arrangement)		
Age	Estimated fund value (before charges) £	Estimated fund value (after charges) £	Effect of charges £	Estimated fund value (before charges) £	Estimated fund value (after charges) £	Effect of charges £
46	10,560	10,560	0	10,560	10,560	0
50	10,360	10,090	270	11,850	11,640	210
55	10,110	9,520	590	13,690	13,150	540
60	9,860	8,990	870	15,810	14,860	950
65	9,620	8,490	1,130	18,270	16,780	1,490

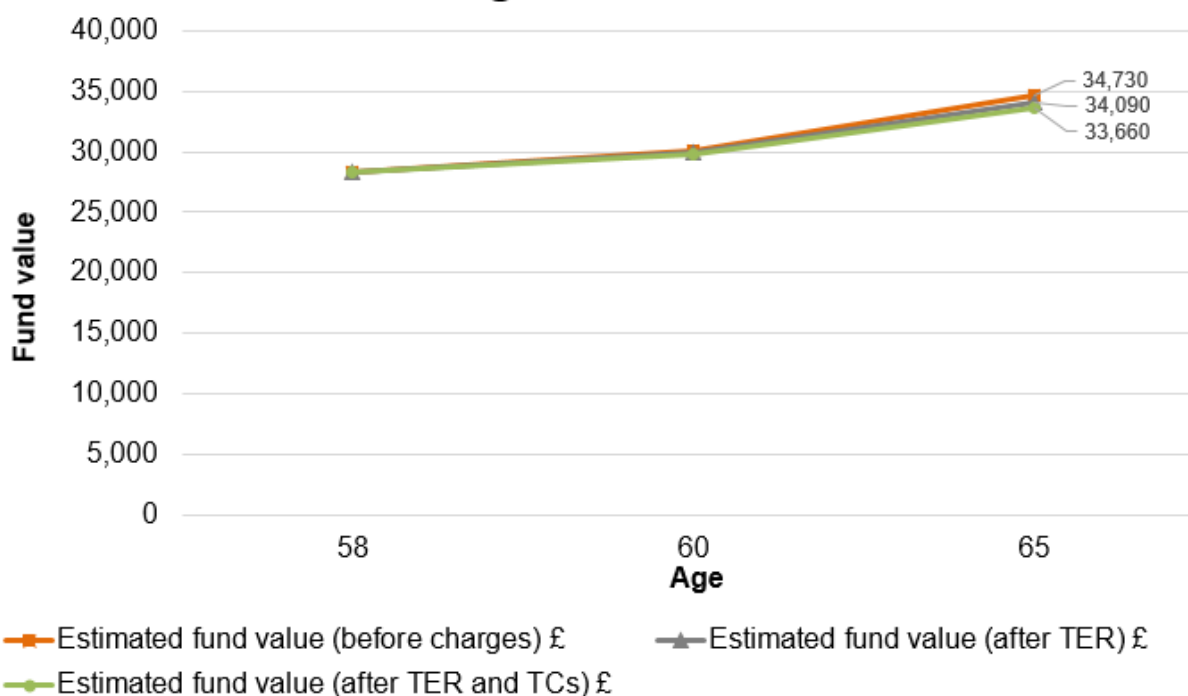
	Standard Life Managed Fund (the most expensive arrangement)			Scottish Widows Consensus Fund (the least expensive arrangement)		
Age	Estimated fund value (before charges) £	Estimated fund value (after charges) £	Effect of charges £	Estimated fund value (before charges) £	Estimated fund value (after charges) £	Effect of charges £
46	10,560	10,560	0	10,560	10,560	0
50	11,850	11,520	330	12,080	12,020	60
55	13,690	12,840	850	14,290	14,140	150
60	15,810	14,320	1,490	16,900	16,640	260
65	18,270	15,960	2,310	19,990	19,570	420

Fund values are shown against their relevant spending power in today's terms (i.e. after the impact of expected inflation). Returns for cash instruments in particular may not keep pace with inflation and, in low interest rate conditions, may result in negative returns (i.e. a decrease in the value of holdings in the fund after deduction of charges). Members invested in these options should ensure it is appropriate for their personal circumstances.

Example member 2

The illustration below is based on a Deferred Member 7 years from normal retirement at age 65, with a current fund value of £28,380 and no further contributions. The table highlights the cumulative effect of costs and charges on the Member's fund value for an investment in the default arrangement (the Standard Life Deposit and Treasury Fund, the Scottish Widows Abbey Retirement Fund (the most popular fund), the Standard Life Managed Fund (the most expensive fund), and the Scottish Widows Consensus fund (the least expensive fund).

Average Deferred Member - ARF



	Standard Life Deposit and Treasury Fund (the Default Arrangement)			Scottish Widows Abbey Retirement Fund (ARF) (the most popular arrangement)		
Age	Estimated fund value (before charges) £	Estimated fund value (after charges) £	Effect of charges £	Estimated fund value (before charges) £	Estimated fund value (after charges) £	Effect of charges £
58	28,380	28,380	0	28,380	28,380	0
60	28,100	27,740	360	30,070	29,800	270
65	27,420	26,190	1,230	34,730	33,660	1,070

	Standard Life Managed Fund (the most expensive arrangement)			Scottish Widows Consensus Fund (the least expensive arrangement)		
Age	Estimated fund value (before charges) £	Estimated fund value (after charges) £	Effect of charges £	Estimated fund value (before charges) £	Estimated fund value (after charges) £	Effect of charges £
58	28,380	28,380	0	28,380	28,380	0
60	30,070	29,640	430	30,350	30,280	70
65	34,730	33,050	1,680	35,900	35,620	280

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Fund values are shown against their relevant spending power in today's terms (i.e. after the impact of expected inflation). Returns for cash instruments in particular may not keep pace with inflation and, in low interest rate conditions, may result in negative returns (i.e. a decrease in the value of holdings in the fund after deduction of charges). Members invested in these options should ensure it is appropriate for their personal circumstances.

The following assumptions have been made for the purposes of the above illustrations:

1. Projected pension pot values are shown in today's terms, and do not need to be reduced further for the effect of future inflation;
2. Inflation is assumed to be 2.5% each year;
3. Values shown are estimates and are not guaranteed;
4. The assumed growth rates reflect expected 10-year annualised returns (net of costs and charges) and are as follows:
 - Deposit and Treasury Fund 1.3% p.a.
 - Managed Fund 4.8% p.a.
 - ARF 5.1% p.a.
 - Consensus Fund 5.9% p.a.

These assumptions have been derived using Aon's Capital Market Assumptions as at 31 March 2022.

5. The transaction costs assumed have been averaged over the longest period available. For the majority of funds, three years of transaction cost information is available. A floor of 0.00% pa has been used for the transaction costs if these were negative in any year, so as not to potentially understate the effect of charges on fund values over time.

Fund	TER (%)	Average Transaction Costs (%)	Total Cost (%)
Standard Life Deposit and Treasury Pension Fund (the Default Arrangement)	0.61	0.06	0.67
Standard Life Managed Pension Fund	0.62	0.13	0.75
SW Abbey Retirement Fund (ARF)	0.28	0.14 ¹	0.42
Scottish Widows Consensus Fund	0.00	0.12	0.12

¹The SW ARF's transaction costs over the period from 1 April 2018 to 31 March 2020 were unavailable. For the purposes of the illustrations, we have used the ARF's transaction cost covering the average of the two Scheme years up to 31 March 2022.

5. Value for Members

The Administration Regulations require the Trustee to make an assessment of charges and transactions costs borne by Members and the extent to which those charges and costs represent good value for money for Members.

There is no regulatory definition of "good value" and the process of determining this for Members is a subjective one. Based on advice from the Scheme's Investment Adviser, Aon Investment Limited (AIL), the Trustee has established a cost-benefit analysis framework in order to assess whether the Member borne charges deliver good Value for Members. The assessment is relevant to the current Scheme membership. The cost part of the analysis considers the costs and charges Members pay, as set out in Section 4 of this statement.

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The Trustee has considered the benefits of Scheme membership under the following categories: Scheme governance, investments, administration and member experience, GMP underpins, and member communications. These are set out below along with the main highlights of their assessment. In assessing value across these different areas, the Trustee has taken account of the Pension Regulator's DC Code of Practice.

Costs and Charges

Members pay investment charges as detailed above. The remaining charges (including administration, governance and advisory fees) are borne by the Company. The Trustee considers this is an additional valuable benefit for Members. Overall, Members of the Scheme have access to a range of investment options which the Trustee have identified as having charges and transaction costs that are both reasonable and good value. Further, discounts are applied to the Scottish Widows and Standard Life TERs, which reduces charges significantly.

All of the funds are reviewed regularly and those that are regarded as representing poor value for money for Members, either due to high charges (or in some cases, sustained poor performance), may be closed. The fund range includes other options for Members to choose from that carry lower charges.

Scheme governance

The Trustee believes in having robust processes and structures in place to support the effective management of risks and ensure that Members interests are protected, increasing the likelihood of good outcomes for Members.

These processes are documented in the Scheme's risk register and are regularly reviewed to ensure they remain appropriate.

The Trustee Directors also attend regular training sessions, which include sessions that are relevant to DC funds, to ensure that the Trustee is made aware of new regulations and investment ideas. A record of attendance at these sessions is maintained in a training log and is detailed in Section 6.

Administration

The Trustee believes that good administration and record keeping play a crucial role in ensuring that Scheme Members receive the retirement income due to them. In addition, that the type and quality of service experienced by Members has a bearing on the level of Member engagement.

The Scheme administrator, EQ, provides quarterly stewardship reports, which includes a breakdown of the administrator's performance relative to the agreed SLA. Further information about the administrator's performance relative to the agreed SLA can be found in section 3.

Investments

The Trustee regards the most important aspect of value to Members to be making available a range of suitable investment options with competitive charges from which Members are able to choose.

Members of the Scheme have a range of investment options to choose from; each option has a different associated charge. The Trustee has certain powers afforded by the Scheme's Trust Deed and Rules in relation to making changes to the investment options available to Members. The Trustee has exercised these powers on a number of occasions in the past by closing funds to new contributions.

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The last review of the fund range available to Members in the DC and AVC arrangement took place in 2020.

It concluded that the fund range covers the majority of asset classes, and that the costs and charges borne by Members in those funds that remain open to switches in represent good value for Members.

However, the review did conclude that there is a lack of exposure to some equity regions within the Standard Life and Scottish Widows fund ranges and some duplication within the Scottish Widows funds. The review also concluded that the Standard Life GARS fund had been down-graded and, after taking appropriate advice, the Trustee decided to remove this fund from the fund range (noting that no Members were invested in the fund).

Overall, the Trustee agreed that the remaining fund range was appropriate for Members.

The Trustee will continue to monitor and review triennially the ongoing suitability of these legacy arrangements. The next AVC review will take place during the 2023/24 scheme year.

GMP Underpin

A number of Members within the Scheme have investments that are associated with a GMP guarantee. The underpin continues to provide a “floor” of a guaranteed minimum pension, regardless of asset performance, which would be lost if this underpin was not a benefit feature. The underpin has historically been found to apply for a number of Members and is therefore expected to apply to a number of Members on a forward-looking basis.

Member communications

The Trustee continues to communicate regularly with Members via a newsletter to ensure that they are aware of the investment options available to them and to encourage them to review their investment choices regularly to ensure that they remain appropriate to their individual circumstances. The latest newsletter was sent to Members in February 2022. The Trustee also agreed to send out an additional member communication to remind Members to review their fund choices to ensure they remain appropriate for their own personal circumstances.

6. Trustee Directors' Knowledge and Understanding

Sections 247 and 248 of the Pensions Act 2004 set out the requirement for Trustee to have appropriate knowledge and understanding of the law relating to pensions and trusts, the funding of occupational pension schemes, the investment of Scheme assets, and other matters to enable them to exercise their functions as a Trustee properly. This requirement is underpinned by guidance in the Pension Regulator’s Code of Practice 7.

The comments in this section relate to the Scheme as a whole and not just the DC Section.

The Scheme is managed by 5 Trustee Directors; 3 Trustee Directors are appointed by the Principal Employer, and there are 2 Member Nominated Directors. No new Trustee Directors joined the Trustee Board during the year. The composition of the Trustee board is compliant with Regulatory requirements and demonstrates diversification of skills and breadth and depth of pension knowledge.

Trustee Directors are familiar with the key Scheme documents (including the Trust Deed and Rules, the Statement of Investment Principles, and other scheme management documentation) and are able to access these documents within the Trustee’s secure online portal. Scheme documents are reviewed by the Trustee on a regular basis.

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All Trustee Directors are made aware of the training resources available throughout the Scheme year and undertake additional training as required. Training undertaken by each Trustee Director is recorded within the Trustee Training Log, which is reviewed and updated regularly.

Over the course of the scheme year, the Trustee Directors have attended the following pension related seminars and training sessions listed below:

- Pensions Expert – DB Forum 2021;
- Aon – webinar on 2021 Annual Funding Statement;
- ASI Institutional Investor Forum – webinar on private credit;
- Sackers – quarterly legal update;
- Professional Pensions – Professional Pensions Live 2021;
- Phoenix CBT – Financial Crime Prevention;
- Phoenix CBT – Conflicts of Interest;
- Aon – Pension Schemes Act;
- Aon – reporting Pension Scams;
- Trustee meetings – ESG developments, Single Code of Practice, Employer covenant, Integrated Risk Management, DC/AVC training, tPR reporting;
- Action Fraud webinar – reporting pension scams;
- BlackRock – 2022 outlook;
- abrdn – rethinking fixed income investing;
- Sackers – new transfer regime;
- Linklaters Pensions Investment Practice – investments into private closed-ended funds;
- FT Live & Pensions Expert DB and DC Pensions – management summit.

The Trustee Directors also have arrangements in place for ensuring that they take personal responsibility for keeping themselves up-to-date with relevant developments and carry out a self-assessment of training needs periodically to determine training requirements. A full trustee knowledge and understanding assessment was carried out at the beginning of 2021, and a training plan was subsequently prepared. The training plan continues to be adapted and addresses areas of focus from the 2021 knowledge and understanding assessment, including further DC training.

Any new Trustee Directors are expected to complete the Pension Regulator's Trustee Toolkit within a reasonable period from the date of their appointment and all Trustee Directors are expected to complete any additional modules within a reasonable time period of them becoming available.

In addition to the knowledge and understanding of the Trustee board, the Trustee receives advice from its appointed professional advisers where any gaps are identified. The Trustee has engaged with its appointed professional advisers throughout the year to ensure that they run the Scheme effectively and exercise their functions properly (including managing Trustee succession planning).

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Agenda-specific training is also provided by the Scheme's professional advisers during Board meetings and the Trustee has:

- Reviewed the Scheme's default arrangement, which considers the performance and cost of the default arrangement for the Scheme's membership. The Trustee also considered other fund options in 2020 as part of the self-select fund review;
- Reviewed administration reports from EQ, to monitor service delivery against agreed service levels;
- Ensured that an audit of the Trustee's Report and Accounts is carried out for the Scheme year ended 31 March 2021;
- Considered Scheme risks and the law relating to pensions and trusts through updating the risk register.

Throughout the year, the Trustee has worked closely with its appointed professional advisers, who have provided specialist advice and updates on legislation, guidance and best practice developments, to ensure that they properly exercise their functions as Trustee Directors.

Considering the training activities completed by the Trustee Board, together with the professional advice available to the Trustee, the Trustee considers that it meets the Pension Regulator's requirements (as set out under Code of Practice No 7) and is confident that the combined knowledge and understanding of the Trustee Board, together with the input from its specialist advisers, enables it to properly exercise its functions as the Trustee of the Scheme.

Approved by the Trustee Board, Abbey Life Trust Securities Limited, Trustee of the Abbey Life Assurance Company Limited Staff Pension Scheme, on 21st September 2022

**ORIGINAL SIGNED ON BEHALF OF THE TRUSTEE BY
Neil C H Tointon
Chairman of the Trustee Board
Abbey Life Trust Securities Limited
21st September 2022**