Chair's Statement

Annual Chair's Statement for the DC and AVC sections of the Allen & Overy Pension Scheme

The Occupational Pension Schemes (Scheme Administration) Regulations 1996 ("the Administration Regulations") require the Trustee to prepare an annual statement regarding governance, which must be included in the annual Trustee's report and accounts. The governance requirements apply to all trust-based Defined Contribution ("DC") pension arrangements, including DC schemes with Additional Voluntary Contribution arrangements where they are not the only money purchase benefits. They aim to help members achieve a good outcome from their pension savings.

This statement relates to the Defined Contribution Section (the "DC Section") of the Allen & Overy Pension Scheme (the "Scheme") and the money purchase additional voluntary contributions held by members of the Defined Benefit Section of the Scheme (the "AVCs"). It covers the period from **1 January 2022 to 31 December 2022.** It has been signed on behalf of the Trustee by the Chair.

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

1. The primary and secondary default arrangements,
2. Net investment returns
3. Member borne charges and transaction costs,
4. Assessing Value for Members,
5. Processing of core financial transactions, and
6. Trustee knowledge and understanding.

The Trustee has a process in place to publish relevant parts of this statement online and notify members within annual benefit statements about its availability.

1. The Primary and Secondary Default Arrangements

The Trustee is required to design the default arrangements in members' interests and keep them under review. The Trustee needs to set out the aims and objectives of the default arrangements and take account of the level of costs and the risk profile that are appropriate for the Scheme's membership.

The DC Section is used as a Qualifying Scheme for auto-enrolment purposes and has both a primary and secondary default arrangement:

- **Primary default arrangement:** The Multi-Asset Lifecycle Strategy is for members who join the Scheme and do not choose an investment option for their contributions. Members can also choose to invest in this strategy on a self-select basis.
- **Secondary default arrangement**: The temporary suspension of trading in the Standard Life Pooled Property Pension Fund, due to the impact of the Covid-19 pandemic, prevented members' contributions from being paid into the fund. These contributions were temporarily diverted to the Standard Life Deposit and Treasury Pension Fund. As a result, the Deposit and Treasury Pension Fund was designated a secondary default arrangement in March 2020.

More details regarding the primary and secondary default arrangements can be found in the sections that follow.

The Trustee is responsible for the Scheme's investment governance, which includes setting and monitoring the investment strategy for the Scheme's primary and secondary default arrangements.

Details of the objectives and the Trustee's policies regarding the primary and secondary default arrangements can be found in the 'Statement of Investment Principles' ("SIP") for the DC and AVC Sections of the Scheme.

The SIP covering the DC and AVC Sections of the Scheme, which was prepared in accordance with regulation 2A of the Investment Regulations 2005, was updated and signed by the Chair of the Trustee on 12 May 2022, to reflect the changes made to the Lifecycle strategies on 10 November 2021.

The latest SIP for the DC and AVC Sections of the Scheme, dated 12 May 2022, is attached to this statement and can also be viewed here:

https://www.myallenoverypension.com/Library/AOLibMemComm.asp

Primary Default Arrangement – The Multi-Asset Lifecyle Strategy

The Multi-Asset Lifecyle Strategy is suitable for members who join the Scheme and do not choose to take an active role in managing their investment options. However, members that do take an active role with managing their investment options can select this strategy should it align with their investment and retirement objectives.

The Multi-Asset Lifecycle Strategy invests in several underlying funds and automatically changes the funds members are invested in as they approach retirement. This approach aims to maximise the growth potential of investments in the early years and reduce investment risk (by investing across a broader range of asset classes) the closer members get to retirement.

The Multi-Asset Lifecyle strategy comprises three phases:

- **Accumulation phase**: this phase is the period leading up to 15 years before retirement. It aims to provide members with the potential of long-term capital growth by investing in higher risk assets, such as equities. It is assumed that in this phase, members have a greater capacity for risk as they have more time to recover from changes in the value of their retirement savings that may be caused by short-term market volatility.
- **Transition phase**: In this phase, the aim is to reduce investment risk in the lead-up to retirement. Between 15 and 10 years prior to retirement, allocations to lower risk assets, such as multi-asset funds, are gradually introduced and this is achieved by reducing the allocations to equities. Between

10 and 5 years prior to retirement, allocations to government and corporate bonds are introduced. This is achieved by reducing the allocations to equities and multi-asset funds, as mentioned above.

- **Pre-retirement phase**: Starting at 5 years to retirement, this phase aims to further reduce risk and to ensure the strategy is invested in a mix of assets at retirement broadly appropriate for members to use an income drawdown approach in retirement (this would involve a member transferring their funds to an external arrangement at retirement).

Secondary default arrangement – Standard Life Deposit and Treasury Pension Fund

The Standard Life Deposit and Treasury Pension Fund became a secondary default arrangement in March 2020, following the temporary suspension of the Standard Life Pooled Property Pension Fund as the fund manager was unable to obtain accurate valuations of the Fund’s holdings to the restrictions imposed by the UK government to address the Covid-19 pandemic.

The temporary suspension of the Standard Life Pooled Property Pension Fund prevented further contributions being made into the Fund during that period.

The Trustee notified affected members of the suspension and that members could redirect their contributions to an alternative fund in the DC Scheme arrangement.

However, members that did not provide an alternative receiving fund before the given deadline had their contributions automatically invested into the Standard Life Deposit and Treasury Pension Fund. Consequently, the Deposit and Treasury Fund was classified as a secondary default investment option for regulatory reporting and monitoring purposes.

The primary aim of the Standard Life Deposit & Treasury Pension Fund is to maintain capital and provide returns (before charges) in line with short term money market rates by investing in deposits and short-term money market instruments.

The Trustee believed that the Standard Life Deposit and Treasury Pension Fund was an appropriate investment option in which to temporarily hold contributions intended for the Standard Life Pooled Property Pension Fund as it has historically experienced low levels of volatility and was deemed to be a suitable option to protect the value of members' contributions on a short-term basis.

The Standard Life Pooled Property Fund's suspension was lifted in September 2020. The affected members were notified of this and informed that they could choose to redirect their future contributions and any retirement savings accrued during the period of suspension back to the Standard Life Pooled Property Fund.

Investment Strategy Review

The Trustee is required by regulations to carry out an Investment Strategy Review, which includes formally reviewing the suitability of the primary and secondary default arrangements, at least every three years or following any significant changes in the demographic profile of the Scheme members.

The latest Investment Strategy Review to be carried out for the Scheme was completed by the Trustee on 28 November 2022 and consisted of the following:

- Analysis of the membership profile of the Scheme, which also considered the suitability of the primary and secondary default arrangements;
- Retirement adequacy analysis, which highlighted the proportion of members that would likely retire with a sufficient pension pot to achieve their desired standard of living throughout retirement as well as how alterations to member contributions and retirement ages would impact the statistics;
- A critical review of the current investment strategy deployed by the Scheme, with the Trustee’s investment consultants providing recommendations that could improve potential returns for members over the long-term based on in-house modelling and assumptions. The Trustee’s investment consultants also highlighted a number of limitations associated with the current DC pension provision.

Following the review, the Trustee acknowledged the information and recommendations put forward by its investment consultants. However, any decisions on changes to the investment strategy were deferred by the Trustee, pending the outcome of ongoing discussions with its advisers and the Firm about potential changes to the current DC pension structure.

Additional Performance monitoring

During the Scheme year, the Trustee, with support of its investment consultant, carried out a review of the Aviva and Prudential With Profit funds held within the legacy AVC arrangement. The review was completed on the 26 May 2022 and did not identify any major concerns over the longer-term suitability of the With Profits Funds' providers. The recommendation put forward to the Trustee by its investment consultant was to maintain these funds as they are.

The Trustee, with support from its investment consultant, also carries out regular investment monitoring. The performance of all funds, including those underlying the primary and secondary default arrangements, are incorporated into quarterly monitoring reports that are produced by the Trustee's investment consultants. These reports are then reviewed by the Trustee at each quarterly meeting.

This performance monitoring includes an assessment of fund performance against stated benchmarks and targets over various periods, as well as a red-amber-green rating system to help identify any concerns.

Over the course of the Scheme year, there were no changes made to the funds as a result of this monitoring.

2. Net Investment Returns

The Trustee is required to report on net investment returns for each default arrangement and for each non-default fund which scheme 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. 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.

Multi-Asset Lifecycle Strategy (the primary default arrangement)

The net investment returns for the Multi-Asset Lifecycle Strategy, across a 1-year reporting period as at 31 December 2022, is shown in the table below.

The Trustee, with the support of its investment consultants, implemented a number of changes to the underlying component funds that make up the Multi-Asset Lifecycle Strategy in November 2021. As such, performance shown over the five-year period incorporates these changes to the stated performance.

Performance to 31 December 2022	**Annualised Returns (%)**	
Age of member on 1 January 2022	**1 Year**	**5 Year**
25	-7.0	3.6
45	-7.0	3.6
55	-8.9	0.8

Source: Standard Life and underlying managers. Returns quoted net of total expense ratios and transaction costs. Performance figures are annualised for periods in excess of one year. The retirement age shown in this table is 65, which is line with the retirement age selected by the majority of members.

All members suffered a negative net return over the 1-year reporting period, a reflection of the challenges faced by financial markets throughout 2022.

Members closer to retirement suffered greater losses than those further from retirement across the 1-year reporting period. This would typically not be expected, given that a proportion of members assets transition to "lower risk" assets, primarily fixed income as retirement approaches. However, the gradual increase in interest rates by central banks across the developed world throughout 2022 has resulted in bond prices to fall, leading to negative returns for fixed income funds.

Furthermore, UK bonds experienced a period of significant difficulty across September and October 2022, following a negative market reaction to a number of proposals set out by the UK government at the time. While many of these proposals were reversed, there has been significant volatility across UK bond markets, resulting in significant negative returns for UK government bonds.

The level of net returns achieved over the five-year period was positive for members across all ages and decreased as members approach retirement, which is assumed to be 65 years in this case. This is to be expected as the Multi-Asset Lifecycle Strategy automatically switches members' savings into a more diversified mix of assets in order to reduce risk as they approach retirement age. The mix of assets includes multi-asset funds as well as corporate and government bond funds, which are expected to generate lower returns than equities over the long-term given their lower risk profile.

Standard Life Deposit and Treasury Pension Fund (the secondary default arrangement)

The net investment returns for the Standard Life Deposit and Treasury Pension Fund, across a 1-year and 5-year reporting periods as at 31 December 2022, are shown in the table below.

Performance to 31 December 2022	**Annualised Returns (%)**	
Fund Name	**1 Year**	**5 Year**
Standard Life Deposit and Treasury Pension Fund	1.2	0.5

Source: Standard Life and underlying managers. Returns quoted net of total expense ratios and transaction costs. Performance figures are annualised for periods in excess of one year. The retirement age shown in this table is 65, which is line with the retirement age selected by the majority of members.

Members invested in the Standard Life Deposit and Treasury Pension Fund generated a positive net investment return across both the one year and five year reporting periods.

The rise in interest rates across most developed nations has been beneficial for the Standard Life Deposit and Treasury Pension Fund, diverging from the performance of equity and fixed income funds during the same period.

The lower net investment return achieved over the 5-year reporting period reflects the low returns associated with investing in money-market instruments across a period when interest rates for many developed nations were much lower.

Additional Lifecycle Strategies

Cash Lifecycle Strategy

The net investment returns for the Cash Lifecycle Strategy, across a 1-year reporting period as at 31 December 2022, are shown in the table below.

The Trustee, with the support of its investment consultants, implemented a number of changes to the underlying component funds that make up the Cash Lifecycle Strategy in November 2021. As such, performance has been shown over the 1-year period only.

Performance to 31 December 2022	**Annualised Returns (%)**	
Age of member on 1 January 2022	**1 Year**	**5 Year**
25	-7.0	3.6
45	-7.0	3.6
55	-8.9	0.8

Source: Standard Life and underlying managers. Returns quoted net of total expense ratios and transaction costs. Performance figures are annualised for periods in excess of one year. The retirement age shown in this table is 65, which is line with the retirement age selected by the majority of members.

Similar to the Multi-Asset Lifecycle Strategy, members suffered a negative absolute return over the 1-year reporting period, a reflection of the challenges faced by financial markets throughout 2022 (see commentary for the Multi-Asset Lifecycle Strategy above).

Members achieved positive returns over the 5-year period, which decreased as members approach their selected retirement age. Similar to the Multi-Asset Lifecycle Strategy, this is to be expected as the Cash Lifecycle Strategy automatically switches members' savings into a more diversified mix of assets in order to reduce risk as they approach retirement age.

Annuity Lifecycle Strategy

The net investment returns for the Annuity Lifecycle Strategy, across a 1-year reporting period as at 31 December 2022, are shown in the table below.

The Trustee, with the support of its investment consultants, implemented a number of changes to the underlying component funds that make up the Annuity Lifecycle Strategy in November 2021. As such, performance has been shown over the 1-year period only.

Performance to 31 December 2022	**Annualised Returns (%)**	
Age of member on 1 January 2022	**1 Year**	**5 Year**
25	-7.0	3.6
45	-7.0	3.6
55	-8.9	0.8

Source: Standard Life and underlying managers. Returns quoted net of total expense ratios and transaction costs. Performance figures are annualised for periods in excess of one year. The retirement age shown in this table is 65, which is line with the retirement age selected by the majority of members.

Similar to the members investment in the Multi-Asset Lifecycle Strategy, members invested in the Annuity Lifecycle Strategy suffered a negative absolute return over the 1-year reporting period, a reflection of the challenges faced by financial markets throughout 2022.

Members closer to retirement generated a more negative absolute return across the 1-year reporting period relative to younger members. This would typically not be expected, given that a proportion of members assets transition to “lower risk” assets, primarily fixed income. However, the gradual increase in interest rates by central banks across the developed world throughout 2022 has resulted in bond prices to fall, leading to negative returns for fixed income funds.

Furthermore, UK bonds experienced a period of significant difficulty across September and October 2022, following a negative market reaction to a number of proposals set out by the UK government at the time. While many of these proposals were reversed, there has been significant volatility across UK bond markets, resulting in significant negative returns for UK government bonds.

Members achieved positive returns over the 5-year period, which decreased as members approach their selected retirement age. Similar to the Multi-Asset Lifecycle Strategy, this is to be expected as the Annuity Lifecycle Strategy automatically switches members’ savings into a more diversified mix of assets in order to reduce risk as they approach retirement age.

Self-Select Investment Funds

The table below shows the net investment returns achieved by each of the self-select funds over the 1-year and 5-year reporting periods.

Performance to 31 December 2022	**Annualised Returns (%)**	
Fund Name	**1 Year**	**5 Year**
Standard Life Overseas Tracker Pension Fund	-7.4	9.3
SL Vanguard FTSE UK All Share Index Pension Fund	0.3	2.8
Standard Life Global Equity 50:50 Tracker Pension Fund	-3.5	6.1
SL Vanguard Emerging Markets Stock Index Pension Fund	-10.4	0.5
SL Veritas Global Focus Pension Fund	-10.9	7.0
Standard Life Liontrust (formerly Majedie) UK Equity Pension Fund	-9.9	0.3
SL Schroder Intermediated Diversified Growth Pension Fund	-11.5	n/a
SL Ninety-One Global Multi-Asset Sustainable Growth Fund	-7.8	n/a
SL Corporate Bond Fund	-18.5	-1.6

Standard Life Index Linked Bond Pension Fund	-38.3	-5.4
SL Vanguard UK Investment Grade Bond Index Pension Fund	-17.7	-1.7
Standard Life UK Fixed Interest 60:40 Pension Fund	-26.5	-3.2
SL ASI Global Real Estate Institutional Pension Fund	-1.0	4.1
Standard Life Pooled Property Pension Fund	-18.0	0.7
Standard Life Deposit and Treasury Pension Fund	1.2	0.5

Source: Standard Life and underlying managers. Returns quoted net of total expense ratios and transaction costs. Performance figures are annualised for periods in excess of one year.

Additional Voluntary Contributions

The Trustee had previously set up an arrangement for members of the Defined Benefit section to invest AVCs. However, these policies are now all "Closed".

Members who opted to transfer from the Defined Benefit Section to the DC Section for future accrual were able to maintain their holdings in the legacy AVC policies, subject to the terms and conditions of each vehicle.

Members that held legacy AVC policies had the ability to invest in unit linked funds that are identical to those made available to members within the DC Scheme. Net investment return information for these funds can be found in the table above.

Additionally, there are legacy AVC policies in place with Aviva and Prudential in the form of With Profits Funds.

Performance to 31 December 2022	**Annual bonuses declared (%)**	
Fund Name	**1 Year**	**5 Year**
Prudential With Profits Cash Accumulation Fund	1.0	1.1
Aviva Conventional With Profits Fund	*Not provided*	*Not provided*

Source: Prudential and Aviva.

For the With Profit Funds, the returns shown are the annualised bonus rate declared on the funds over the relevant period. Whilst in practice we would expect a terminal bonus to increase returns to levels close to those achieved on the underlying assets in the With Profit fund over the period held (after all costs of running the fund), these amounts are unknown and are not guaranteed. Furthermore, a market value reduction which can reduce the return delivered to investors may be applied on exit at any time other than maturity date, or in the event of death before retirement.
Aviva were contacted but were unable to provide a response in time for the publication of this statement.

3. Member Borne Charges and Transaction costs

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

- *Charges: these are explicit, and represent the costs associated with operating and managing an investment fund. They can be identified as a Total Expense Ratio (TER), or as an Annual Management Charge (AMC), which is a component of the TER;*
- *Transaction costs: these are not explicit and are incurred when the Scheme's fund manager buys and sells assets within investment funds but are exclusive of any costs incurred when members invest in or sell out of funds.*

The Trustee is also required to confirm that the total costs and charges paid by any member in the default arrangement have not exceeded 0.75% p.a. (the charge cap) and produce an illustration of the cumulative effect of the overall costs and charges on members' retirement fund values as required by the Occupational Pension Schemes (Administration and Disclosure) (Amendment) Regulations 2018.

DC Section

As part of the Lifecycle strategies (including the primary default arrangement), members' assets are invested in a different blend of funds depending on how far away they are from retirement and, as such, the TERs for the Lifecycle strategies will vary in accordance with the blend of funds held at any point in time.

Over the reporting period, the Multi-Asset Lifecycle Strategy (the primary default arrangement) levied a Total Expense Ratio (TER) ranging from 0.10% p.a. to 0.42% p.a. of assets under management, depending on term to retirement, well below the charge cap of 0.75% p.a.

The Total Expense Ratio for the Standard Life Deposit and Treasury Pension Fund (the secondary default arrangement) was 0.16% over the Scheme year, which is also below the 0.75% p.a. charge cap.

In addition to the primary and secondary default arrangements, the Scheme also offers a range of 15 self-select funds and 2 other Lifecycle strategies that members can choose to invest in as an alternative to the default strategy.

The TERs that were levied on these funds and strategies as at 31 December 2022 are set out in the table below. The TERs applicable to different funds are readily available to members and can be found via the Scheme's website. The TER is deducted as a percentage of members' funds.

The tables below also indicate the transaction costs incurred for each of the Lifecycle strategies and self-select funds available to members over the Scheme year to 31 December 2022. The transaction costs shown below are calculated using the standardised method set by the Financial Conduct Authority.

The transaction costs shown were incurred largely as a result of buying and selling investments in a fund. These comprise explicit transaction costs and implicit transaction costs, which are explained in more detail here:

- As defined by the Financial Conduct Authority, explicit transaction costs are the costs that are directly charged to or paid by the fund and may include taxes and levies (such as stamp duty), broker commissions (fees charged by the executing broker in order to buy and sell investments) and costs of borrowing or lending securities.
- Implicit transaction costs are calculated as the difference between the actual price paid (execution price) and the quoted 'mid-market price' at the time of the order was placed (arrival price). This method, although reasonable if observed over a long period of time, can result in a volatile measure from one year to another.

Fund costs as at 31 December 2022

Lifecycle strategies	Total Expense Ratio (TER) (%)	Transaction Costs (%)	Total costs (%)
Multi-Asset Lifecycle Strategy *(primary default arrangement)*	0.10 – 0.42	0.07 - 0.15	0.25 – 0.52
Cash	0.10 – 0.42	0.04 – 0.15	0.20 – 0.52
Annuity	0.10 – 0.42	0.05 – 0.15	0.25 – 0.52
Funds used in the Lifecyle strategies and also available within the Self-Select arrangement			
Standard Life Overseas Tracker Pension Fund	0.10	0.15	0.25
Standard Life Vanguard FTSE UK All Share Index Pension Fund	0.10	0.19	0.29
Standard Life Schroder Intermediated Diversified Growth Pension Fund	0.68	0.07	0.75
Standard Life Ninety One Global Multi-Asset Sustainable Growth Pension Fund[1]	0.80	0.03	0.83
Standard Life Corporate Bond Fund	0.31	0.05	0.36
Standard Life Index Linked Bond Pension Fund	0.31	0.06	0.37
Standard Life Deposit and Treasury Pension Fund *(secondary default arrangement)*	0.16	0.04	0.20
Self-Select Funds			
Standard Life Global Equity 50:50 Tracker Pension Fund	0.11	0.03	0.14
Standard Life Veritas Global Focus Pension Fund	0.94	0.04	0.98
Standard Life Liontrust (formerly Majedie) UK Equity Fund[5]	0.80	0.03	0.83
Standard Life Vanguard Emerging Markets Stock Index Pension Fund	0.25	0.23	0.48
Standard Life Vanguard UK Investment Grade Bond Index Pension Fund	0.10	0.08	0.18
Standard Life UK Fixed Interest 60:40 Pension Fund	0.31	0.00	0.31

Standard Life ASI Global Real Estate Institutional Pension Fund[2]	0.88	0.00	0.88
Standard Life Pooled Property Pension Fund[2]	0.53	0.14	0.67

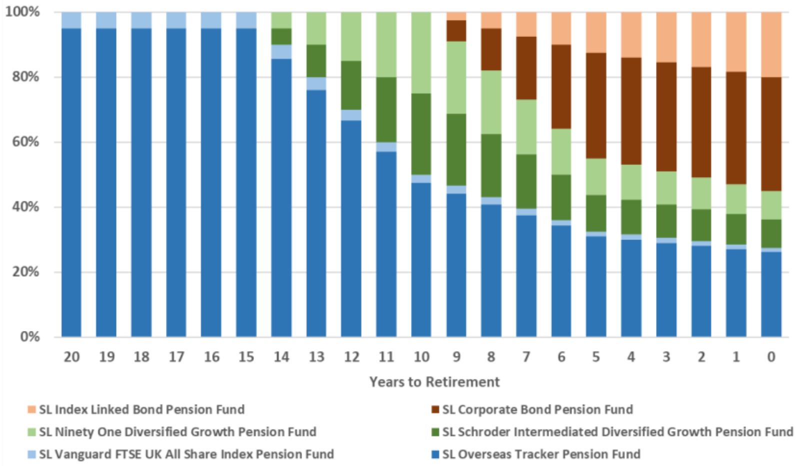
Source: abrdn. The TERs and Transaction Costs quoted are applicable for the 12 months to 31 December 2022.
1. The Ninety One Global Multi-Asset Sustainable Growth Fund's name was changed from SL Ninety One Diversified Growth Fund in April 2021.
2. Following on-going concerns about the historical performance of the Standard Life Pooled Property Pension Fund, the Trustee soft-closed the fund to new investments in Q2 2021. The Trustee chose to add the Standard Life ASI Global Real Estate Institutional Pension Fund to self-select fund range in Q2 2021.
3. The LionTrust UK Equity Pension Fund was soft-closed to new investments in Q4 2022.

Multi-Asset Lifecycle Strategy (Primary Default arrangement)

During the Scheme year, the costs and charges applicable to each member that was invested in the Multi-Asset Lifecycle Strategy were dependant on the number of years the member had remaining until their selected retirement age, as the allocation to each underlying component fund automatically adjusts as a member approaches retirement.

The chart below displays the allocation of underlying component funds that make up the Multi-Asset Lifecycle Strategy.

The tables provide a breakdown of the TERs and transaction costs applicable to a member each year up to retirement. Please note that that due to rounding it is possible that the total cost value displayed below may not be equal to the sum of the TER and transaction cost.



Years to retirement	15+	14	13	12	11	10	9	8
TER % p.a.	0.10	0.16	0.23	0.29	0.36	0.42	0.40	0.39
Transaction Costs %	0.15	0.14	0.13	0.12	0.11	0.10	0.09	0.09
Total Cost %*	0.25	0.30	0.36	0.41	0.46	0.52	0.50	0.48

Years to retirement	7	6	5	4	3	2	1	0
TER % p.a.	0.37	0.35	0.34	0.34	0.33	0.33	0.33	0.33

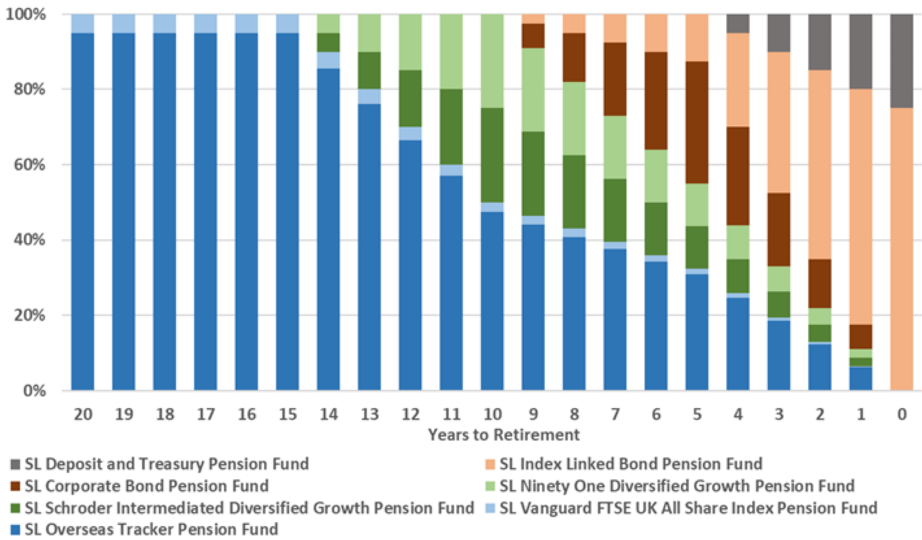
Transaction Costs %	0.09	0.08	0.08	0.08	0.08	0.08	0.08	0.08
Total Cost %*	0.46	0.44	0.42	0.42	0.41	0.41	0.41	0.40

Annuity Lifecycle strategy

During the Scheme year, the costs and charges applicable to each member that was invested in the Annuity Lifecycle Strategy were dependant on the number of years the member had remaining until their selected retirement age, as the allocation to each underlying component fund automatically adjusts as a member approaches retirement.

The chart below displays the allocation of underlying component funds that make up the Annuity Lifecycle Strategy.

The tables provide a breakdown of the TERs and transaction costs applicable to a member each year up to retirement. Please note that that due to rounding it is possible that the total cost value displayed below may not be equal to the sum of the TER and transaction cost.



Years to retirement	**15+**	**14**	**13**	**12**	**11**	**10**	**9**	**8**
TER % p.a.	0.10	0.16	0.23	0.29	0.36	0.42	0.40	0.39
Transaction Costs %	0.15	0.14	0.13	0.12	0.11	0.10	0.09	0.09
Total Cost %	0.25	0.30	0.36	0.41	0.46	0.52	0.50	0.48

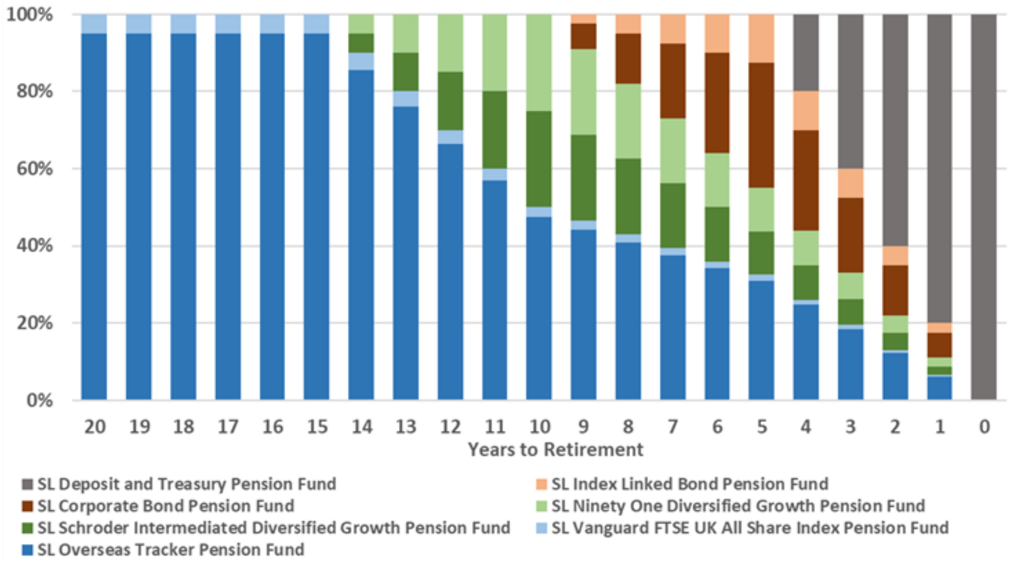
Years to retirement	**7**	**6**	**5**	**4**	**3**	**2**	**1**	0
TER % p.a.	0.37	0.35	0.34	0.33	0.31	0.30	0.29	0.27
Transaction Costs %	0.09	0.08	0.08	0.08	0.07	0.07	0.06	0.05
Total Cost %	0.46	0.44	0.42	0.40	0.38	0.36	0.35	0.33

Cash Lifecycle strategy

During the Scheme year, the costs and charges applicable to each member that was invested in the Annuity Lifecycle Strategy were dependant on the number of years the member had remaining until their selected retirement age, as the allocation to each underlying component fund automatically adjusts as a member approaches retirement.

The chart below displays the allocation of underlying component funds that make up the Annuity Lifecycle Strategy.

The tables provide a breakdown of the TERs and transaction costs applicable to a member each year up to retirement. Please note that that due to rounding it is possible that the total cost value displayed below may not be equal to the sum of the TER and transaction cost.



Years to retirement	**15+**	**14**	**13**	**12**	**11**	**10**	**9**	**8**
TER % p.a.	0.10	0.16	0.23	0.29	0.36	0.42	0.40	0.39
Transaction Costs %	0.15	0.14	0.13	0.12	0.11	0.10	0.09	0.09
Total Cost %*	0.25	0.30	0.36	0.41	0.46	0.52	0.50	0.48

Years to retirement	**7**	**6**	**5**	**4**	**3**	**2**	**1**	0
TER % p.a.	0.37	0.35	0.34	0.30	0.27	0.23	0.20	0.16
Transaction Costs %	0.09	0.08	0.08	0.07	0.06	0.06	0.05	0.04
Total Cost %*	0.46	0.44	0.42	0.38	0.33	0.29	0.24	0.20

*Totals may not sum due to rounding

Legacy AVC Arrangements

As discussed in section 2, members that were able to invest in the legacy AVC arrangement had the ability to invest in the unit-linked policies that were available to the DC Section membership. A table showing the breakdown of the charges and transaction costs associated with each fund can be found in the table above.

The Trustee has also requested charges and transaction cost information from the legacy AVC With-Profits Funds providers, Prudential and Aviva.

The Prudential With Profits Cash Accumulation Fund was the only fund managed by Prudential that held member assets at the end of the reporting period. There are no explicit fund management charges for this Fund - charges are inherent within the annual bonus declarations, which is a standard market practice for With Profits funds. Prudential's estimated management charge is 0.8% per annum assuming investment returns are 5% p.a. plus AE of 0.18% per annum

Fund Name	TER (%)	Transaction Costs (%)	Total Cost (%)
Prudential With Profits Cash Accumulation Fund	n/a	0.10[1]	n/a

[1]Transaction costs provided are for the period 1 April 2021 – 31 March 2022.

The Aviva Conventional With Profits Fund was the only Aviva managed fund that held member assets at the end of the period in question. Aviva have confirmed that there are no explicit charges or transaction costs applying to the Conventional With Profits Fund available to members through the Scheme.

The costs of operating the Aviva Conventional With Profits Fund are taken account of when the annual bonus rate on the Fund is declared. Aviva does not provide any indication of the costs of investing in the Conventional With Profits Fund, and this is common market practice for older style conventional With Profits Fund.

Illustration of the cumulative impact of costs and charges on member fund value over time

From 6 April 2018, the Occupational Pension Schemes (Administration and Disclosure) (Amendment) Regulations 2018 introduced new requirements relating to the disclosure and publication of the level of costs by the trustees and managers of a relevant scheme. These changes are intended to improve transparency on costs.

In order to help members understand the impact that costs and charges can have on their retirement savings, the Trustee has provided 3 illustrations of their cumulative effect on the value of typical scheme members savings over the period to their retirement. The typical scheme members used for the illustrations and the strategies and funds modelled below are in line with the requirements set out in the DWP Guidance on producing illustrations for Chair's Statements. The typical scheme members have been selected as they enable the Trustee to provide a realistic and representative range of combinations of pot size, contribution rates and effect of costs and charges over different time periods in the illustrations.

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 appendix.

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.

Each illustration [the youngest active member, a typical active member and a typical deferred member] is shown for a different type of member invested in the Multi-Asset Lifecycle strategy (the primary default arrangement) and the SL Deposit and Treasury Fund (the secondary default). Each illustration is shown as a chart and a table as follows:

- The Chart shows a projection of the member's retirement savings at retirement age, with and without costs and charges applied, if they invested solely in the Multi-Asset Lifecyle Strategy (the primary default arrangement) and the SL Deposit and Treasury Fund (the secondary default arrangement).

- As the projected retirement savings are dependent on investment returns as well as the level of costs and charges, we have also included some comparison figures with other investments in the Tables for the Multi-Asset Lifecycle Strategy. For comparison purposes and following updated guidance, we also show the projected retirement savings if the typical member were invested in the fund with the highest and lowest charges the SL Veritas Global Focus Pension Fund which has higher charges the Standard Life Global Equity 50:50 Tracker which has the lowest charges.

All projected fund values are shown in today's terms, and do not need to be reduced further for the effect of future expected inflation.

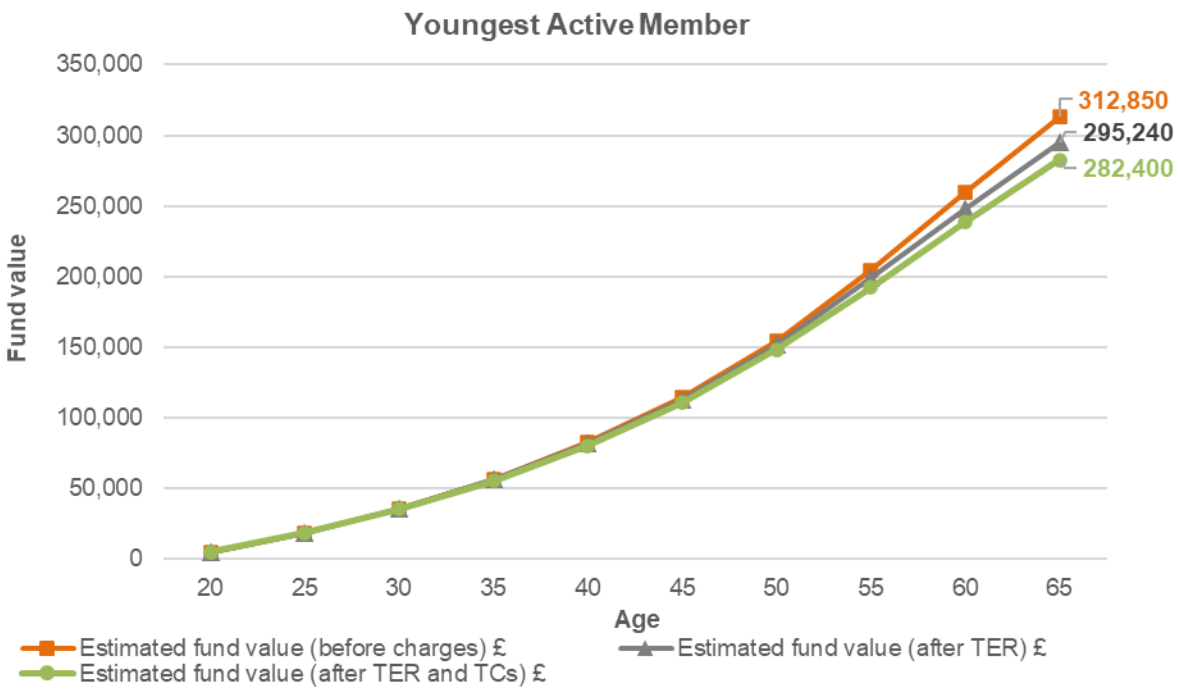
Please note that not all investment options available are shown in the illustrations. Members are also offered a range of self-select funds which, as the tables above show, which have different TERs and transaction costs.

It should be noted that returns for cash instruments have historically been very low, and after the reduction for charges, some members may incur capital erosion due to inflation being higher than our assumed cash returns (2.5% p.a. vs 2.5% p.a.). Members may want to consider reviewing their fund options if they are invested in the Standard Life Deposit and Treasury Pension Fund (the secondary default arrangement) to ensure it is appropriate for their personal circumstances.

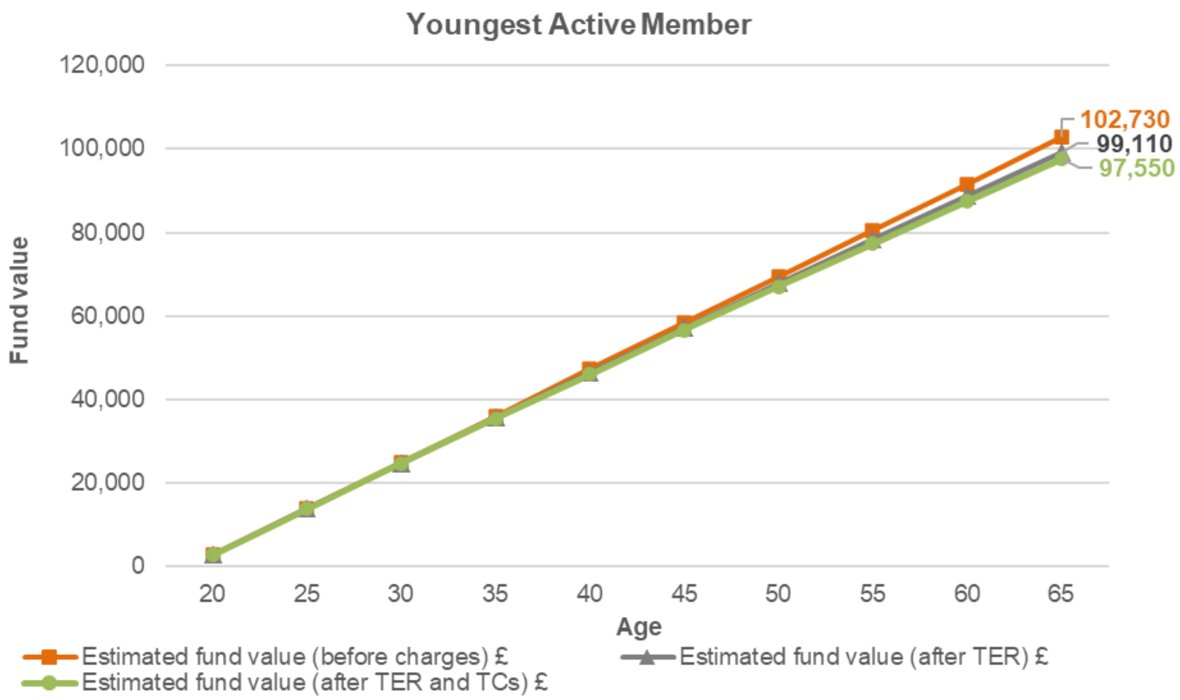
Youngest Active Member

For the youngest active member invested in the Multi-Asset Lifecycle (the primary default arrangement) and the Standard Life Deposit and Treasury Fund (the secondary default arrangement), the estimated impact of charges on accumulated fund values is shown in the table and chart below. The amounts shown relate to a member aged 18, current fund value of £500, salary of £25,000, ongoing contributions of 9% of salary and a Normal Retirement Age of 65.

Multi-Asset Lifecycle



Standard Life Deposit and Treasury Fund



Age	Multi-Asset Lifecycle Strategy (Primary Default Arrangement)			SL Veritas Global Focus Pension Fund		
	Est. fund value before charges (£)	Est. fund value after charges (£)	Effect of charges (£)	Est. fund value before charges (£)	Est. fund value after charges (£)	Effect of charges (£)
18	500	500	0	500	500	0
20	5,190	5,180	20	5,230	5,180	60
25	18,820	18,760	160	19,360	18,730	690
30	35,730	35,510	530	37,550	35,420	2,340
35	56,690	56,180	1,210	60,960	55,980	5,460
40	82,670	81,680	2,340	91,070	81,290	10,690
45	114,870	113,150	4,080	129,810	112,470	18,930
50	154,800	151,980	6,670	179,670	150,860	31,390
55	204,290	198,710	11,840	243,810	198,150	49,680
60	259,410	248,210	20,810	326,350	256,390	75,990
65	312,850	295,240	30,450	432,550	328,110	113,250

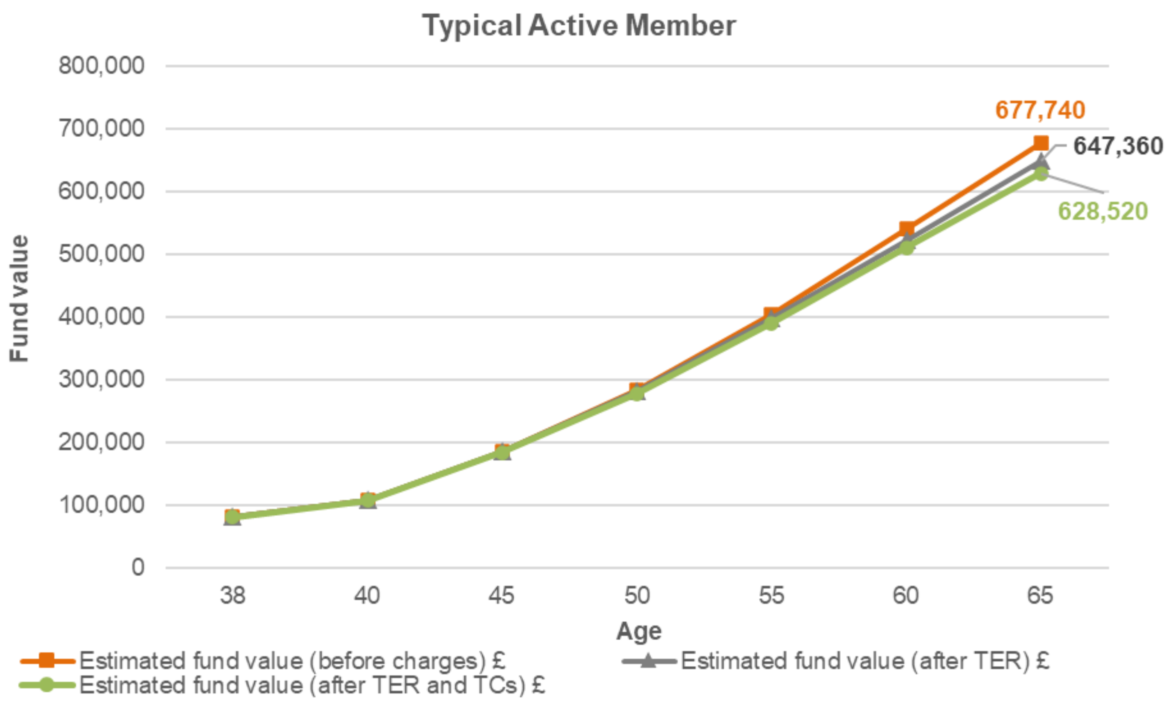
Age	Standard Life Global Equity 50:50 Tracker			Standard Life Deposit and Treasury Fund (Secondary Default Arrangement)		
	Est. fund value before charges (£)	Est. fund value after charges (£)	Effect of charges (£)	Est. fund value before charges (£)	Est. fund value after charges (£)	Effect of charges (£)
18	500	500	0	500	500	0

20	5,190	5,180	10	2,720	2,720	0
25	18,820	18,750	110	13,830	13,770	90
30	35,730	35,490	370	24,950	24,730	320
35	56,690	56,130	860	36,060	35,610	650
40	82,670	81,580	1,660	47,170	46,400	1,110
45	114,870	112,980	2,880	58,280	57,100	1,690
50	154,800	151,700	4,720	69,390	67,730	2,390
55	204,290	199,450	7,360	80,510	78,270	3,210
60	265,640	258,340	11,080	91,620	88,730	4,140
65	341,700	330,970	16,270	102,730	99,110	5,180

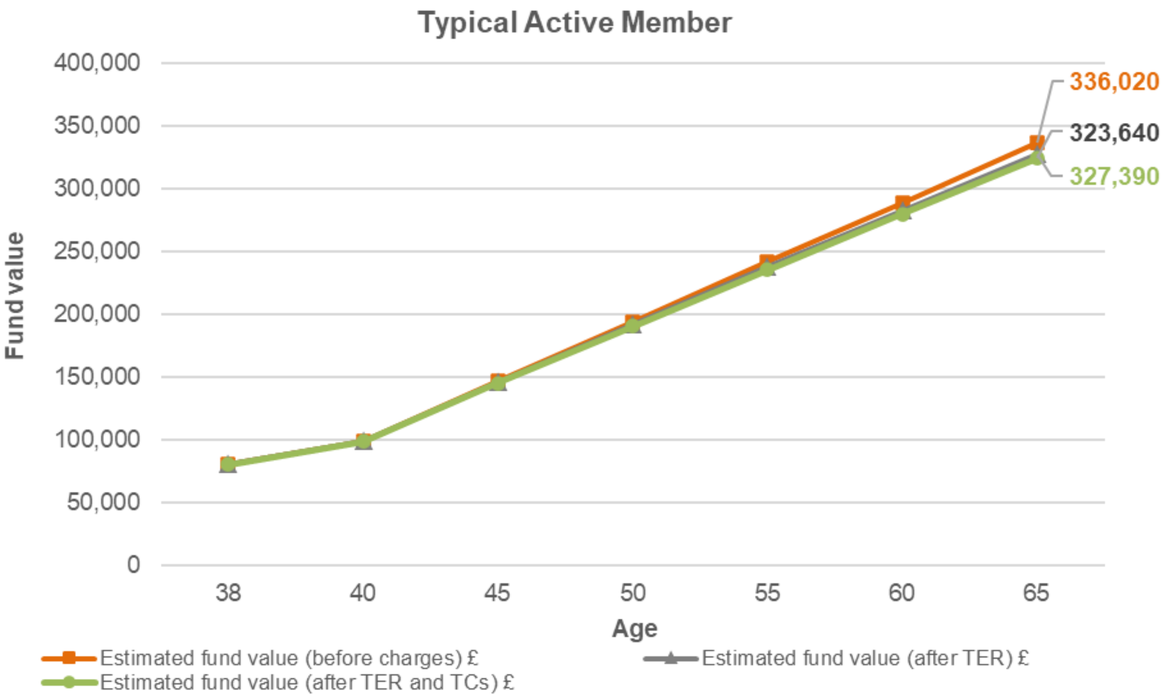
Typical Active Member

For a typical active member invested in the Multi-Asset Lifecycle strategy (primary default arrangement) and the Standard Life Deposit and Treasury Fund (the secondary default arrangement), the estimated impact of charges on accumulated fund values is shown in the table and charts below. The amounts shown relate to a member aged 38, current fund value of £80,000, salary of £80,000, ongoing contributions of 12% of salary and a Normal Retirement Age of 65, which reflects a typical active member based on the Scheme's current membership. Compared to the youngest active member, note the contribution level of 12% (compared to 9% which reflects the youngest active member) is a key driver of the higher total fund value at retirement.

Multi-Asset Lifecycle



Standard Life Deposit and Treasury Fund



Age	Multi-Asset Lifecycle Strategy (Primary Default Arrangement)			SL Veritas Global Focus Pension Fund		
	Est. fund value before charges (£)	Est. fund value after charges (£)	Effect of charges (£)	Est. fund value before charges (£)	Est. fund value after charges (£)	Effect of charges (£)
38	80,000	80,000	0	80,000	80,000	0
40	106,980	106,800	430	108,440	106,730	1,890
45	185,500	184,530	2,310	193,440	184,150	10,200
50	282,840	280,450	5,710	302,820	279,490	25,560
55	403,510	396,500	14,110	443,550	396,920	51,010
60	540,300	522,680	30,560	624,630	541,540	90,740
65	677,740	647,360	49,220	857,620	719,640	150,410

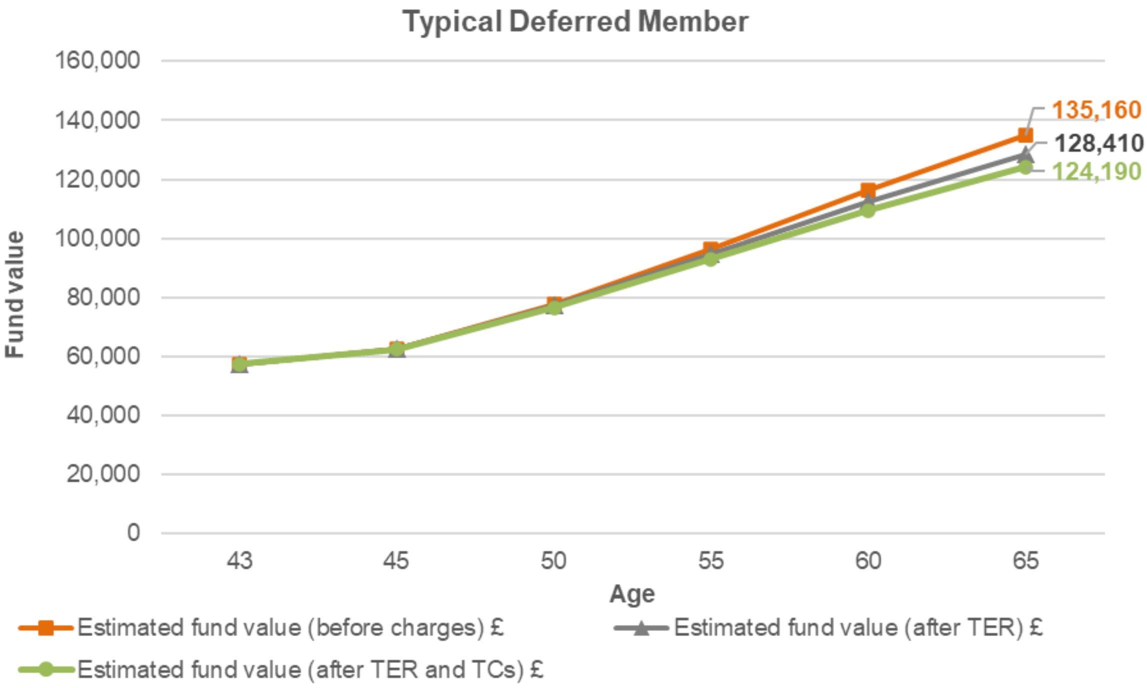
Age	Standard Life Global Equity 50:50 Tracker			Standard Life Deposit and Treasury Fund (Secondary Default Arrangement)		
	Est. fund value before charges (£)	Est. fund value after charges (£)	Effect of charges (£)	Est. fund value before charges (£)	Est. fund value after charges (£)	Effect of charges (£)
38	80,000	80,000	0	80,000	80,000	0
40	106,980	106,780	310	98,960	98,690	400
45	185,500	184,440	1,630	146,380	145,140	1,780
50	282,840	280,210	4,020	193,790	191,240	3,670
55	403,510	398,320	7,910	241,200	236,980	6,070

60	553,100	543,990	13,870	288,610	282,360	8,980
65	738,530	723,650	22,650	336,020	327,390	12,380

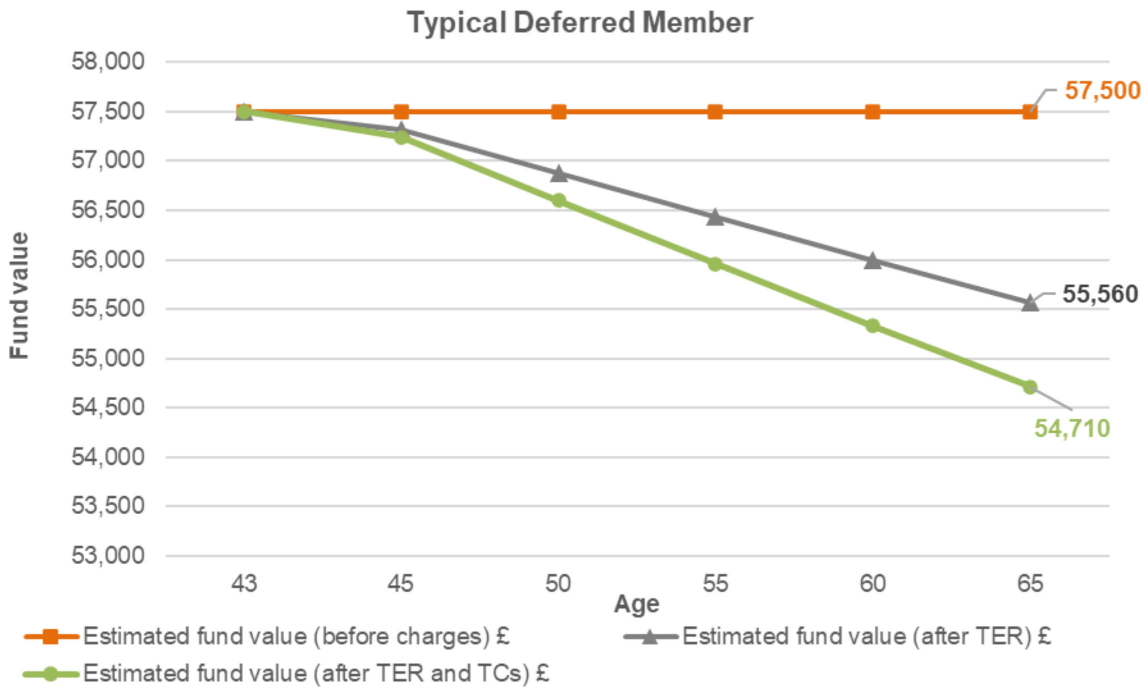
Typical Deferred Member

For a deferred member invested in the Multi-Asset Lifecycle strategy (primary default arrangement) and the Standard Life Deposit and Treasury Fund (the secondary default arrangement), the estimated impact of charges on accumulated fund values is shown in the table and charts below. The amounts shown relate to a member aged 43, current fund value of £57,500, no ongoing contributions and a Normal Retirement Age of 65, which reflects a typical deferred member based on the Scheme's current membership.

Multi-Asset Lifecycle



<u>Standard Life Deposit and Treasury Fund</u>



Age	Multi-Asset Lifecycle Strategy (Primary Default Arrangement)			SL Veritas Global Focus Pension Fund		
	Est. fund value before charges (£)	Est. fund value after charges (£)	Effect of charges (£)	Est. fund value before charges (£)	Est. fund value after charges (£)	Effect of charges (£)
42	57,500	57,500	0	57,500	57,500	0
45	62,660	62,540	280	63,600	62,500	1,210
50	77,680	77,170	1,210	81,830	76,970	5,340
55	96,290	94,650	3,270	105,290	94,790	11,500
60	116,530	112,470	7,020	135,480	116,740	20,480
65	135,160	128,410	10,970	174,320	143,770	33,320

Age	Standard Life Global Equity 50:50 Tracker			Standard Life Deposit and Treasury Fund (Secondary Default Arrangement)		
	Est. fund value before charges (£)	Est. fund value after charges (£)	Effect of charges (£)	Est. fund value before charges (£)	Est. fund value after charges (£)	Effect of charges (£)
42	57,500	57,500	0	57,500	57,500	0
45	62,660	62,530	200	57,500	57,320	260
50	77,680	77,120	860	57,500	56,870	900
55	96,290	95,110	1,800	57,500	56,430	1,540
60	119,370	117,300	3,160	57,500	55,990	2,170
65	147,970	144,660	5,040	57,500	55,560	2,790

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. *Salary growth is assumed to be in line with inflation.*
4. *Values shown are estimates and are not guaranteed.*
5. *Contributions for active members are assumed from current age to 65.*
6. *The transaction costs, as defined in regulation 2(1) of the Occupational Pension Schemes (Charges and Governance) Regulations 2015, should be based on an average of the previous 5 years' transaction costs or, where data is available for fewer than 5 years, an average of transactions costs over the years for which data is available. Currently, less than 5 years of transaction cost information is available from providers, however we expect data provision to improve over time. For the majority of funds, four years of transaction cost information is available and as such, the transaction costs in the table below (which have been used in providing the above illustrations) reflect the average over the last four years.*
7. *The assumed growth rates (gross of costs and charges) are included in the table below:*

Fund	***Assumed growth rates* (%)***	***TER (%)***	***Average Transaction Costs (%)***	***Total Cost (%)***
Standard Life Overseas Tracker Pension Fund	*7.0*	*0.10*	*0.15*	*0.25*
Standard Life Vanguard FTSE UK All Share Index Pension Fund	*7.0*	*0.10*	*0.19*	*0.29*
Standard Life Schroder Intermediated Diversified Growth Pension Fund	*7.0*	*0.68*	*0.07*	*0.75*
Standard Life Ninety-One Diversified Growth Fund	*7.0*	*0.80*	*0.03*	*0.83*
Standard Life Corporate Bond Fund	*4.4*	*0.31*	*0.05*	*0.36*
Standard Life Index Linked Bond Pension Fund	*3.5*	*0.31*	*0.06*	*0.37*
Standard Life Deposit and Treasury Pension Fund	*2.5*	*0.16*	*0.04*	*0.20*
Standard Life Global Equity 50:50 Tracker Fund	*7.0*	*0.11*	*0.03*	*0.14*
Standard Life Veritas Global Focus Equity Fund	*7.8*	*0.94*	*0.04*	*0.98*

*The assumed growth rates are calculated gross of charges and are shown per annum.

4. Value for Members assessment

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 legal definition of "good value" and the process of determining this for members is a subjective one. Based on advice from the Scheme's investment consultant, Aon, 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 membership and covers the year to 31 December 2022. The cost part of the analysis considers the costs and charges members pay. The benefits part of the analysis includes a range of other factors that the Trustee has chosen to consider (including administration, communications and governance) that members do not bear the cost of.

Costs

- The costs and charges associated with both default arrangements are well below the charge cap of 0.75% per annum and this information is made available to members through the Scheme website.
- Based on the profile of the Scheme's DC arrangements, the Trustee believes that the explicit charges are competitive when compared to the current market on a like for like basis.
- The costs have been identified as TER and transaction costs and are set out in section 3 of this statement. The Trustee has considered the benefits of membership under the following categories: Scheme governance, investments, administration and member experience, member communications and engagement and retirement support.

Administration

- The Trustee monitors the Scheme’s administration service provided on a quarterly basis and found that the necessary administration standards were being achieved during the Scheme year.
- In addition to this, the Trustee Secretary and Pensions Manager meet with the administrator directly on behalf of the Trustee on an annual basis in order to ensure ongoing adherence to the standards set.

Communications

- The Scheme provides members with clear, regular communications regarding any changes to the Scheme's investments, as well as a quarterly summary of fund performance available to members via the website, benefit statements and 'at retirement' communications.
- Members have the ability to ask the Trustee any questions in relation to the Scheme’s underlying investment strategies. Throughout the Scheme year, the Trustee, with support of its investment consultants, have addressed a number of member queries. This includes questions about the availability of ESG strategies in the DC Section as well as the performance of the funds / lifecycle strategies available to members.
- Scheme literature and information is available through the Scheme website at www.myallenoverypension.com.

Governance

- The Trustee continues to carry out an annual assessment against the DC Code of Practice ahead of the General Code of Practice being launched in 2023.
- The Trustee has built a robust governance approach for the Scheme, and the DC Section is a regular standing item at quarterly Trustee meetings. With the support of its advisers, the quarterly meetings are an opportunity to review quarterly administration reports in detail, and assess the effectiveness of the Trustee Board in their oversight of the Scheme.

Investment Choices

- The Trustee believes the Scheme provides members with an appropriate range of Lifecycle strategies and self-select fund options, covering a range of risk profiles and asset classes.
- The structure of the primary default for the DC Section, the Multi-Asset Lifecycle Strategy, reflects how members are expected to access their funds at retirement.
- Investments are monitored by the Trustee against their agreed benchmarks and performance objectives on a quarterly basis.
- The Trustee completed the triennial Investment Strategy Review of the DC Section on 28 November 2022. Further details of the Investment Strategy Review are given in section 1 of this Statement.
- The Trustee also conducted a review of the legacy AVC arrangements held with Prudential and Aviva on 26 May 2022. Further details of the review are given in section 1 of this Statement.

Conclusion

The Trustee's overall assessment described above concluded that based on the charges and transaction costs members pay on the funds available, the DC and AVC Sections offer good value for members and the other factors assessed as part of the Trustee's wider value assessment enhance the overall quality of the DC Section further. An AVC review was conducted in May 2022 and the Trustee's concluded that there was no major concerns on the longer term suitability of the With Profits Fund providers. The DB AVC members are expected to receive additional value from smoothed investment returns and any guarantees that apply with the With Profit Funds.

5. Processing of Core Financial Transactions

The Trustee has a specific duty to ensure that core financial transactions are processed promptly and accurately. Core financial transactions include the investment of contributions, transfer of member funds into and out of the Scheme, transfers between different investments within the Scheme and payments to and in respect of members/beneficiaries.

DC Section

Capita provide administration services for the DC Section. Members of the Defined Benefit Section of the Scheme who have Additional Voluntary Contributions ("AVCs") also have access to the DC fund range through Standard Life, with Capita also providing administration services for these funds.

To enable the Trustee to monitor the processing of core financial transactions, the Board receives quarterly stewardship reports from Capita on key aspects of the administration which includes special projects, member statistics, contribution monitoring, a schedule of transactions and performance against the service levels agreed. This report is presented and discussed at each Board meeting to ensure the Trustee can monitor Capita's compliance with the service levels agreed and that core financial transactions are processed accurately and in a timely manner.

The Trustee has a Service Level Agreement ("SLA") in place with Capita. This covers contributions, website maintenance, investment switches, benefit statements, general enquiries and member events (such as retirements and transfers). Under the current SLA, Capita aims to accurately complete all tasks (including administration tasks and pension payroll processing) within a maximum of 15 working days. The SLA success rates reported by Capita over the 12 months to 31 December 2022 for the DC Section were high, with an overall success rate of above 92%.

Capita has confirmed that there are processes in place for each type of core financial transaction, to ensure that all transactions are processed accurately and in a timely manner. 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. Capita also have their own internal quality control processes to ensure the accuracy of transactions and monthly unit reconciliations are carried out. There is day-to-day contact with Capita to ensure any issues can be flagged as they arise and dealt with on a timely basis.

In addition, the administration team at Capita is subject to internal audits as well as an annual external audit. The administration team are subject to "on the job" and ad hoc training and development, are actively encouraged to obtain formal qualifications in relevant areas.

The Trustee has up-to-date copies of Capita's AAF report which outlines the administration controls within Capita and these controls will be reviewed on a regular basis as part of a risk register framework. The AAF report did not highlight any areas of concern with regard to the core financial transactions.

Allen & Overy LLP are responsible for ensuring that contributions are paid over to the Scheme promptly, and the Scheme secretary also checks that the contributions are received on time. Capita carries out monthly unit reconciliations.

There were no issues raised regarding Capita's administration of the DC and AVC Sections or processing of core financial transactions over the year and the Trustee is currently comfortable that appropriate measures are in place to ensure that core financial transactions in the DC and AVC Sections are processed promptly and accurately.

AVCs with Prudential and Aviva

As highlighted in the earlier sections, there are a limited number of legacy AVC policies still in place with Aviva and Prudential relating to members of the Defined Benefit section of the Scheme. During the Scheme year, members that held investments within either the Aviva or Prudential were only invested in With Profits Funds.

During the Scheme year to 31 December 2022, no active contributions are being paid into the Aviva or the Prudential arrangement.

At the time of producing this Chair's Statement, Aviva and Prudential have not provided the Trustee with a governance report to cover the Scheme year to 31 December 2022.

Conclusion

Based on the information that the Trustee has received, as set out above, the Trustee considers that core financial transactions were processed promptly and accurately during 2022. Aviva have not provided any information on the With Profit's Funds.

6. Trustee Knowledge and Understanding (“TKU”)

Sections 247 and 248 of the Pensions Act 2004 set out the requirement for trustees to have appropriate knowledge and understanding of the law relating to pensions and trusts, the funding of occupational pension schemes, investment of scheme assets and other matters to enable them to exercise their functions as 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 solely the DC Section.

There were changes made to the Trustee Board over the 12 months to 31 December 2022, including:

- One employer nominated Trustee resigned in with effect from 12 October 2022 and was replaced by a new employer nominated Trustee, with effect from 17 October 2022.
- An employer nominated Trustee was also reappointed for a further term from 1 November 2022. All changes were advised to companies house.

As at 31 December 2022, there were three Employer Appointed Trustee Directors and three Member-Nominated Trustee Directors, as well as a Trustee Secretary

The Trustee considers that during the Scheme year, it's compliance with the TKU requirements has been secured by taking the following measures:

- The Trustee board incorporates a range of skills and experience and a diverse mix of backgrounds, including representatives from finance and pensions management.

While the Trustee Directors did not receive DC-specific training during the Scheme year, the following activities were undertaken over the year which covered DC-specific content:

- Training provided by Aon regarding Climate Risk and possible policies and approaches the Trustee may want to adopt.
- Training provided by Aon focusing on a number of elements associated with the General Code of Practice.
- Ongoing trustee knowledge and understanding e-learning modules by the Pensions Regulator
- Input from their investment consultant on the finalisation of the 2022 investment strategy review.
- Legislative and regulatory updates provided by their professional advisers at Trustee meetings.
- Regular updates from the Trustee’s investment consultant in relation to investment market activity, particularly given the market volatility experienced during 2022.

Given the professional nature and composition of the Trustee, DC-specific training sessions are primarily provided by the Scheme's investment consultant during Board meetings, when necessary.

Training logs are maintained for all Trustee Directors by the Scheme secretary, evidencing both the nature and amount of training completed by each Trustee Director. The training logs are also used to identify training needs as they arise.

The Trustee Directors have also put in place arrangements for ensuring that they take personal responsibility for keeping themselves up to date with relevant developments.

Trustee Directors are encouraged to supplement their knowledge using the Pensions Regulator's Trustee Toolkit within 6 months of appointment, unless they can demonstrate that they have completed alternative training covering substantially the same material. The Trustee Toolkit is an online learning programme from the Pensions Regulator aimed at trustee of occupational pension schemes. It includes a series of online learning modules developed to help trustee achieve the required level of knowledge and understanding to perform their trustee functions. All Trustee Directors are strongly encouraged to complete the module in the Trustee Toolkit on hybrid schemes (i.e., pension schemes with a DB section and DC section, like the Scheme).

Copies of scheme documents are provided as part of the onboarding of new Trustee Directors and are reviewed by the Trustee Board on a regular basis, as well as being available to the Trustee Directors electronically.

In addition to the knowledge and understanding of the Trustee board, the Trustee has engaged with their appointed professional advisers regularly throughout the year to ensure that they run the DC Section and AVC arrangements and exercise their functions properly. The following activities were undertaken by the Trustee during the Scheme year:

- Reviewed quarterly administration reports from Capita to monitor service delivery against agreed service levels;
- Reviewed quarterly reporting of each individual investment fund against its benchmark with advice from its investment consultants (Aon), to monitor performance of the Scheme's funds against targeted benchmarks and objectives as set out in the SIP;
- Finalisation of the Scheme's investment strategy review in conjunction with their investment consultant, including the default strategies and self-select fund range.
- Held four regular Trustee meetings and additional ad-hoc meetings and conference calls as required. The meetings were attended by professional advisers who provided reporting, training and specialist advice as required, in order to enable the Trustee to properly exercise their function of governance over the Scheme;
- Maintained a regime for proper governance (based on the Pension Regulator's DC Code of Practice) and using this as the basis for governance of the DC Section. This is achieved through an annual assessment of the Scheme against the current DC Code of Practice and a Value for Members assessment that directly feeds into the content of this statement; and,
- Completed and submitted a Competition and Markets Authority (CMA) compliance Statement.
- Completed an Implementation statement covering the previous scheme year

Overall and for the reasons set out above, the Trustee believes it continued to meet the TKU requirements (as set out in the Pensions Act 2004 and the relevant Code of Practice) during 2022, and that the Trustee's combined knowledge and understanding, together with advice available to it, enables the Trustee to properly exercise its function.

Signed on behalf of the Trustee of the Allen & Overy Pension Scheme

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Jeremy Parr, Chair of Trustee

Date of signing ___________________