

CHUBB PENSION PLAN

STATEMENT OF INVESTMENT PRINCIPLES

INTRODUCTION

1. This Statement has been prepared by the Trustees of the Chubb Pension Plan (the Plan) to comply with:
 - the Pensions Act 1995, as amended by the Pensions Act 2004;
 - the Occupational Pension Schemes (Investment) Regulations 2005, as amended by the Occupational Pension Schemes (Investment) (Amendment) Regulations 2010;
 - the Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018;
 - the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019.
2. The Statement reflects reviews of the Plan's investment strategy undertaken during 2021 principally to reduce risk by reducing the allocation to growth seeking assets and increasing the hedging by the LDI mandate. As part of these reviews, the Trustees have consulted with a representative of all the employing companies (together, the "Company") participating in the Plan. The Statement also reflects a review of the Plan's LDI portfolio in 2022, following the 2021 actuarial valuation. The Trustees are advised on investment matters by Barnett Waddingham LLP, who have reviewed this Statement. Barnett Waddingham is authorised and regulated by the Financial Conduct Authority. The Trustees consider them to be suitably qualified and experienced for this role.
3. The investment powers of the Trustees are set out in Clause 6.1 of the Definitive Trust Deed & Rules, dated 15 December 2010. This statement is consistent with those powers.
4. In producing this Statement, the Trustees have considered the findings of the Myners Review published in 2001 (including subsequent updates).

STRATEGIC MANAGEMENT OF ASSETS

5. The Trustees' investment objective is to aim to ensure that the assets are sufficient to meet the liabilities over the long term. In so far as risk is at an acceptable level, the Trustees will aim to maximise the return on the assets to reduce the long-term costs of providing the Plan's benefits. The investments are diversified between available investment categories and between geographic areas in order to limit the risk to the Plan. The Trustees recognise that risk is inherent in any investment activity. A multi-asset approach has been adopted, with appropriate attention paid to investment, covenant and funding risks, in order to achieve the level of investment return the Trustees have targeted for the Plan. The Trustees realise that a portfolio of long-dated government bonds would provide a low risk strategy, however, it would not achieve the targeted return. The Trustees take advice from the Plan's investment consultants and the Plan's Actuary to ensure that this approach remains suitable for the Plan.
6. The Pensions Act 2004 introduced a Scheme Specific Funding Requirement with which the Plan has had to comply with effect from the 31 March 2006 actuarial valuation of the Plan. As at the date of agreeing this Statement of Investment Principles, results of the 31 March 2021 actuarial valuation indicate that the Plan is close to being fully funded on a solvency basis.
7. The Trustees obtain a quarterly funding update from the Plan's Actuary to supplement the formal valuations that are carried out at no less than three yearly intervals, together with appropriate cash flow forecasts.
8. The Trustees previously participated in the Chubb Common Investment Fund, which has pursued both a specialist and indexed investment strategy with a positive decision regarding asset allocation. Based on the advice of their investment advisers and having regard to the suitability and diversification of the investments, were diverging from that of the other participant in the Chubb Common Investment Fund, the Trustees have restructured their investments over 2022 to be held directly in the name of the Trustees of the Chubb Pension Plan (subject to some small residual investments that are being reconciled).
9. The trustee body of the Chubb Common Investment Fund largely consists of Trustee Directors of the Chubb Security Pension Fund and Trustees of the Chubb Pension Plan and as such are cooperative in reassigning its assets to its respective scheme participants. Under the terms of the Trust Deed of the Chubb Common Investment Fund, resolutions are passed on a simple majority of those voting. With assets now held largely in the name of the Plan, the Chubb Common Investment Fund residual assets are being addressed and, once complete, the Chubb Common Investment Fund will be wound up.
10. Prior to the separation of the assets, the Trustees of the Chubb Common Investment Fund provide quarterly performance and investment details to the Trustees of the Plan together with copies of all Trustee Minutes and decisions. Responsibility for performance monitoring and all investment decision making has reverted to the Trustee of the Plan following the withdrawal of the assets from the Chubb Common Investment Fund, to be held directly by the Plan.

11. The current long term target allocation agreed in October 2021 is set out below, and is consistent with delivering returns that are in line with the Plan's funding strategy:

	Target allocation
GROWTH ASSETS	
Multi-asset funds	5.0%
PROTECTION ASSETS	
Liability Driven Investment mandate	95.0%
<i>Corporate bonds</i>	<i>28.0%</i>
<i>Gilts*</i>	<i>65.0%</i>
Cash	2.0%
GRAND TOTAL	100.0%

*The gilts mandate utilises leverage through the use of gilt sale and repurchase agreements in order to achieve the liability hedging target (see below)

Protection Assets

The Liability Driven Investment (LDI) mandate is structured to hedge 100% of the interest rate and inflation exposure of the Plan's liabilities assessed on a basis consistent with the Technical Provisions basis, as set out in the Scheme Funding Report dated January 2022, but with liabilities discounted on a gilts curve without a margin.

The LDI portfolio includes an inflation rate trigger mechanism that looks to review the level of hedging if long-dated inflation expectations move by more than 0.5% pa since the LDI analysis was undertaken.

12. The asset allocation position will be monitored quarterly by the Trustees of the Plan.
14. The Trustees delegate their investment duties to appointed specialist investment managers.
15. As the Plan's cash flow is currently negative, the strategic long-term asset allocation includes an allocation to cash, in order to help meet the Plan's cashflow requirements.
16. Whilst the main Plan assets are invested in line with paragraph 11 above, uninvested cash required for the day to day benefit payments of the Plan is held in the Plan's current bank account and is placed on call overnight.

17. The Trustees believe that the investment strategy adopted is currently sufficient to address any reasonable risks that the long-term funding of the Plan will prove inadequate. The Trustees have also considered the risk of a shortfall of assets relative to the liabilities as determined if the Plan were to wind up. To provide an additional measure of control of this risk, the Trustees also impose certain restrictions on the investment managers which are described below.
18. The following measures have been implemented to reduce the risks associated with making investments:

Risk versus the liabilities

Many of the Plan's liabilities are subject to increases that are linked to inflation and when the liabilities are valued this is done with regard to prevailing interest rates. Accordingly, the policy is therefore to invest a substantial proportion of the assets in investments which are expected to respond to changes in inflation and interest rates in a similar way to the liabilities.

Custody

The Trustees ensure the separation of custody of the Fund's assets from its investment managers and its officials by the employment of its independent global custodian, BNY Mellon. The Trustees have signed a global custody agreement with the custodian.

Manager restrictions

The Trustees' agreement on the way the portfolio is managed with each fund manager contains a series of restrictions, which may be amended from time to time. The purpose of the restrictions is to limit the risks from each individual investment and prevent unsuitable investment activity. Each fund manager must comply with these restrictions.

Manager controls

Powers of investment delegated to the fund managers must be exercised with a view to giving effect to the principles contained in this statement so far as is reasonably practicable.

ADDITIONAL VOLUNTARY CONTRIBUTIONS

19. Aegon, the brand name for Scottish Equitable plc, act as provider for investment of funds held in respect of Additional Voluntary Contributions (AVCs). Members are permitted to invest across a range of unit linked funds offered by Aegon, including guest funds.

DIVERSIFICATION AND SUITABILITY OF INVESTMENTS AND THE DAY TO DAY MANAGEMENT OF THE ASSETS

20. The following principal restrictions apply to all investment managers unless held as part of a pooled investment vehicle.

- 20.1 No investment in Carrier Global Corporation or APi Group Corporation, other than through an indexed fund.
- 20.2 No investment in Companies, other than CCIF Venture Limited, where the Trustees of the Chubb Common Investment Fund or the Trustees or Trustee directors of a participating scheme have a material interest or are a Director, other than through an indexed fund.
- 20.3 No use of derivatives except where agreed with the Trustees from time to time.
- 20.4 No stock lending.

The Trustees monitor from time-to-time the employer-related investment content of their portfolio as a whole and will take steps to alter this should they discover this to be more than 5% of the portfolio. Typically this check is carried out annually by the Plan's auditors.

21. No investment manager may invest in property either directly or via property unit trusts, other than the multi-asset pooled unitised vehicles.

The Chubb Common Investment Fund is in the process of completely liquidating its residual 100% shareholding in the CCIF Venture Limited, which is a small property development company.

22. The Trustees recognise that regular rebalancing of the Plan to its long term asset allocation can be expensive in terms of both transaction and opportunity costs. The Trustees therefore permit the asset allocation to drift from the long term target. The Trustees have considered a more formal rebalancing policy, but concluded from their analysis that regular rebalancing neither improves returns nor reduces risk. The Trustees will however seek to review and, if necessary, rebalance the asset allocation on occasions where there is a significant inflow or outflow of payments in to or out of the Plan.
23. The Trustees can, after consulting with the Company and taking professional advice, take tactical positions which may deliberately lead to temporary deviations from the asset allocation set out in this Statement of Investment Principles. The Trustees will formally review the long term asset allocation annually.
24. The Trustee's performance objective of each investment manager is as follows:-

Multi-asset funds

Ruffer Absolute Return Fund –

To outperform the Bank of England's Base Interest rate by 3% per annum (after fees) over rolling 3 years.

Corporate Bonds

Insight Investment Management Ltd –

to manage the bonds using a “buy and maintain” approach with performance compared to the Markit iBoxx GBP Collateralised & Corporates 5+ Index.

LDI

Insight Investment Management Ltd –

to manage the LDI portfolio in line with the Plan’s 100% Liability Hedging Target.

ENVIRONMENT, SOCIAL AND GOVERNANCE FACTORS, ETHICAL INVESTING, ENGAGEMENT AND VOTING RIGHTS

25. The Trustees believe that environmental, social and governance (ESG) factors, including management of climate-related risks, are potentially financially material and therefore have a policy to take these into account, alongside other factors, in the selection, retention and realisation of investments. However, these factors do not take precedence over other financial and non-financial factors, including but not limited to historical performance or fees. The Trustees may consider both financial and non-financial factors when selecting or reviewing the Plan’s investments.
26. The Trustees do not apply any specific ethical criteria to their investments.
27. As the Plan’s investments (except the Insight Bonds and LDI) are held in pooled funds, ESG considerations are set by each of the investment managers. The Plan’s investment managers will ultimately act in the best interests of the Plan’s assets to maximise returns for a given level of risk. The Trustees do not currently impose any specific ESG-related restrictions or requirements on the segregated mandate with Insight, so ESG considerations are determined at their discretion. The Trustees are aware of the approach that each of their investment managers take in relation to ESG considerations.
28. The Trustees believe that good stewardship and positive engagement can lead to improved governance and better risk-adjusted investor returns. The Trustees delegate the exercise of rights (including voting rights) attached to the Plan’s investments to the investment managers. All of the Plan’s managers are signatories to the UN Principles of Responsible Investment and the UK Stewardship Code.
29. In selecting, monitoring and reviewing their investment managers, where appropriate, the Trustees will consider the managers’ policies on engagement and how these policies have been implemented.
30. The Trustees have not considered it appropriate to take into account individual members’ views when establishing the policy on environmental, social and governance factors, engagement and voting rights.

INCENTIVISATION OF INVESTMENT MANAGERS

31. The investment managers are remunerated by fees based on the market value of the assets under management or liabilities being hedged in respect of the LDI mandate.
32. The investment managers are selected so that, in aggregate, the portfolio's returns are expected to allow the Trustees' objectives to be met.
33. The investment managers are not directly incentivised to align the approach they adopt with any non-financial policies or objectives set by the Trustees.
34. The Trustees do not directly incentivise the investment managers to engage with issuers of equity or debt to improve their financial or non-financial performance. The Trustees expect engagement to be undertaken as appropriate and necessary to meet the objectives of the mandates given to investment managers.

CAPITAL STRUCTURE OF INVESTEE COMPANIES

35. Responsibility for monitoring the make-up and development of the capital structure of investee companies is delegated to the investment managers. The Trustees expect the extent to which the investment managers monitor these capital structures to be appropriate to the nature of the mandate.

PERFORMANCE MEASUREMENT AND INVESTMENT MONITORING

36. The overall investment performance of the Plan and each of the investment managers is measured at least quarterly by using Barnett Waddingham's reporting. Barnett Waddingham provide the Trustees with quarterly updates on each of the investment managers and will advise the Trustees on strategic investment issues at least once each year.
37. The Trustees also receive written quarterly reports from each investment manager and the Trustees or Secretary aims to meet with each manager as appropriate to discuss their performance, activity and any wider issues.
38. The performance of the Plan's investment managers and mandates is assessed over a mixture of shorter and longer term time horizons. Ultimately, the Trustees assess manager performance over a period appropriate to the specific aims of the relevant mandate, and in the context of its intended role within the Trustees' wider strategy.

DURATION OF MANAGER APPOINTMENTS

39. The Trustees do not apply any predetermined duration of appointment with the Scheme's current investment managers.
40. Each of the existing mandates is open-ended in nature and therefore does not have a specified maturity.

41. The continued suitability of the managers used by the Plan is reviewed by the Trustees on an ongoing basis and also as part of broader strategic reviews undertaken by the Trustees of the Plan.

PORTFOLIO TURNOVER COSTS

42. The Trustees acknowledge that portfolio turnover costs can impact on the performance of the investments. The Trustees expect the investment managers to change underlying holdings to an extent necessary to meet the objectives of their mandates. The reasonableness of such turnover will vary by each mandate and will change according to market conditions.
43. The Trustees have not set a specific portfolio turnover target for their overall strategy. Neither have the Trustees prescribed a target for the underlying mandates.
44. The investment managers will provide information on portfolio turnover and associated costs to the Trustees, so that this can be monitored, as appropriate.

CONFLICTS OF INTEREST

45. The Trustees maintain a separate conflicts of interest policy and register. Subject to reasonable levels of materiality, these documents record any actual or potential conflicts of interest in relation to investee companies or the investment managers, while also setting out a process for their management.

REVIEW OF THIS STATEMENT

46. The Trustees will review this Statement in response to any aspects of the investments detailed above and, in any event, at least annually. Any such review will again be based on expert investment advice.

August 2022

Signed on behalf of the Trustees of the Chubb Pension Plan

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