

Statement of Investment Principles - Implementation Statement

Scheme year ending 30th June 2024

Introduction

We the Trustees of the Crossroads Commercials Limited Retirement Benefit Scheme (the 'Scheme') have prepared this document which should be read in conjunction with our Statement of Investment Principles ('SIP').

Our SIP sets out our policies and what we want to achieve from the investment choices that we make. This document, which is our Implementation Statement, is designed to set out how, and the extent to which, we believe the SIP has been followed during the scheme's year from 1st July 2023 to 30th June 2024. We also explain our approach to Stewardship and the voting behaviour carried out by Investment Managers on the Trustees' behalf.

The Implementation Statement, together with all other scheme documents can be viewed as the following member web page:

<https://www.dealer.volvotrucks.co.uk/crossroads/misc/pay.html>

Background

The purpose of this Implementation Statement is to outline how key activities and decisions across the scheme year have helped the Trustees to achieve their investment objectives and, where not, what steps have been taken to remedy this.

This Implementation Statement focuses solely on investment related activities. If you wish to hear more generally about our activities during the year, please see our Chair's Statement.

The Implementation Statement is primarily backwards looking.

On the Trustee's behalf Royal London Asset Management (RLAM) invest the assets of the Scheme through an investment platform of pooled funds and so the Trustees are constrained in their ability to directly influence the underlying investee firms.

On a periodic basis the Trustees review and monitor RLAM's approach to due diligence, stewardship activity, engagement with investee firms and voting behaviour to ensure they align with the policies that the Trustees have adopted for members of the scheme.

The Scheme is a hybrid arrangement holding a mixture of Defined Benefit and Defined Contribution elements. The Defined Benefit element consists only of Guaranteed Minimum Pensions (GMP) accrued up to 5 April 1997. In preparing the Statement, therefore, the Trustees have taken account of both elements.

Summary of Changes

Defined Benefit Assets

In March of 2023 the Trustees started the process of reducing exposure to Growth assets in the Defined Benefit assets of the scheme. This was further to advice from the scheme actuary that he would expect to see a lower risk approach for a scheme with this level of maturity. In October 2023 the trustees agreed to continue the process of derisking. 100% of the assets of the GMP fund were switched to governed portfolio 3 and a phased switch of

the Trustee contingency fund began switching from the RL managed to RL defensive managed.

Defined Contribution Assets

In the scheme year under review there were no changes to the Defined Contribution Investment options and strategy for the scheme.

SIP Changes

There have been no updates to the Statement of Investment Principles during the scheme year under review.

Performance against the SIP over the scheme year

Investment Objectives

The Trustees' investment objectives are goals that will be measurable over the long term and cannot be reviewed in isolation over the period of one year.

Some decisions to note in terms of performance against these objectives are as follows:

To maximise the return on investments without incurring undue risk

- The Trustees continue to outsource the management of asset allocation and fund selection for Defined Benefit Assets to RLAM. This has improved ongoing returns and has provided an active review process throughout a challenging and unpredictable year for investment returns
- The Trustees invested 87.70% of the monthly funding payments from the employer as they were received to benefit from pound cost averaging throughout the year, whilst maintaining the Trustee cash fund for member disinvestments
- The Trustees have agreed to reduce the level of growth assets within the scheme to preserve the improved fund level and reduce risk.

To ensure that we can meet our obligations to all beneficiaries of the Scheme,

- The Trustees have agreed to reduce the level of growth assets within the scheme to preserve the improved fund level and reduce risk.
- Following an interim funding valuation report, the scheme actuary advised that employer recovery contributions could be decreased from £61,000 per month to zero. The Trustees asked the sponsoring employer to maintain contributions of £30,500 per month to continue to keep funding at a level that will ultimately be prepared for securing member benefits in the near future.

To preserve the funding position of scheme assets, reducing reliance on the sponsoring employer

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To secure GMP benefits for members via the purchase of a scheme insurance contract within the next five years.

- The Trustees have agreed to reduce the level of growth assets within the scheme to preserve the improved fund level and reduce risk.
- The Trustees primary objective throughout the year has been to progress the implementation of GMP Equalisation which will need to be completed prior to being able to secure GMP benefits via the purchase of a scheme insurance contract.

To pay due regard to the Employer's interests on the size and incidence of Employer's contribution payments

- The trustees commissioned an interim funding report, in October 2023, to establish the ongoing requirement for employer recovery contributions.

To provide members with a range of investment options to enable them to tailor an investment strategy to their needs and risk tolerances

- The trustees continue to offer a range of default investment options.
- The trustees undertook a survey, in October 2023, to obtain feedback on preferences relating to investments options available within the scheme.

Investment Beliefs

We set out within our SIP our core investment beliefs. Our investment decisions have been made in line with these principles:

Belief	Performance/Activity
Understanding the personal profiles and attitudes of the scheme membership is important to providing an appropriate investment strategy for both Defined Benefit and Defined Contribution Assets	The Trustees have a standing agenda item where member engagement is considered and planned. In July 2023 the board took the decision to utilise the Royal London's retirement engagement communication strategy. Though they developed bespoke letters to accompany the communications to make these more relevant to the nature of the scheme. The trustees also undertook a member communication survey in October 2023 to obtain feedback on preferences relating to investments options.
Working collaboratively with the Scheme Employer and understanding their views on the long term aims of the scheme is crucial to managing the risk to and investment of the scheme assets	The Trustees have an open dialogue with the Employer of Crossroads Truck and Bus. An employer covenant update is provided to the Trustees at Trustee meetings, including a Key Performance Indicator (KPI) Report on company financials. The trustees commissioned an interim funding report, in October 2023, to

	establish the ongoing requirement for employer recovery contributions.
Investment risk is generally rewarded over the long term, though following advice of the scheme actuary the strategy of the scheme has now moved towards derisking for preservation rather than growth.	The Trustees have pursued an investment strategy that takes a Balanced Attitude to risk with assets invested in diverse assets. The Trustees are now seeking to protect their funding position with the adoption of a reduced risk strategy.
Asset Allocation is the key driver behind long term investment returns	Asset Allocation decisions are outsourced to RLAM via selection of the Governed Portfolio 3 for investment of GMP Funds and RLAM Defensive Managed Fund for Investment of Trustee Contingency Funds Members are provided with a choice of self-select investment funds that offer single asset and multi asset choices
Active management must be undertaken by skilful managers in specific asset classes	Investments managed by RLAM
Investment charges should not be excessive and will impact upon long term returns for member investments	Investment fees are reviewed annually and compared with the wider market for Occupational Pension Investments The Trustees have secured discounted charges in relation to Royal London's published Annual Management Fees and benefit from the Royal London Profit Share arrangement on an annual basis

The Views of Members and Beneficiaries (Non-Financial Considerations)

The Trustees write to members with Defined Benefit entitlement on an annual basis to provide a Summary Funding Statement with an update on the funding level of the scheme.

In July 2023 the board took the decision to utilise the Royal London's retirement engagement communication strategy. Though they developed bespoke letters to accompany the communications to make these more relevant to the nature of the scheme.

The trustees also undertook a member communication survey in October 2023 to obtain feedback on preferences relating to investments options. The survey received a 48.9% response rate, above expectation.

There has been very little member engagement with their investment profile, with no request to switch investment funds.

The Trustees will continue to raise awareness of member investment options on an annual basis.

Risk Policies

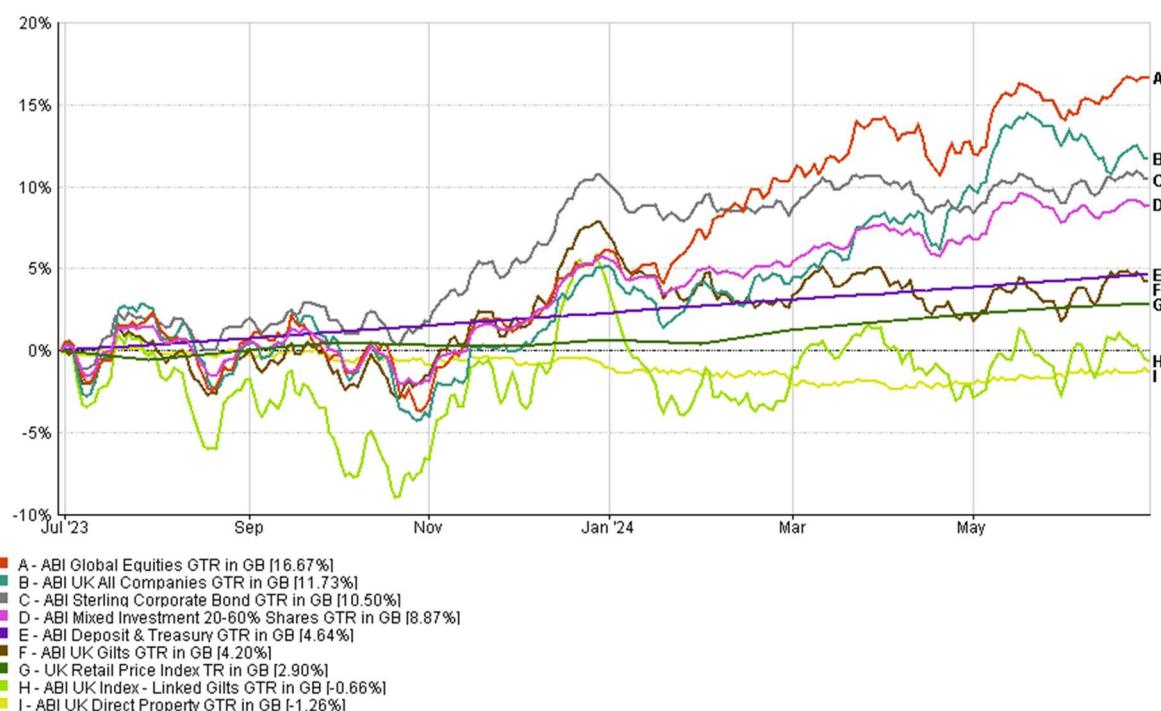
Type of Risk	Measured by	Review Notes
Liquidity	The level of cashflow required for the scheme over a specific period. Failure to meet benefits	All possible payments required from Trustees funds (CETV's and

	as they fall due, as a result of inability to realise assets.	Retirements) were reviewed at each Trustee Meeting.
Diversification	Concentration of assets in any one investment fund or asset class leading to the risk of an adverse influence on investment values arising from poor performance of that fund or asset	Defined Benefit Assets are invested via Royal London managed solutions to benefit from a more active approach to asset allocation management from RLAM.
Benefit Conversion	Adverse movements in investment values prior to realisation for specific members or at Trustee level	Members receive Royal London's retirement engagement communication. They also receive a bespoke letters to accompany the communication to make this more relevant to the nature of the scheme.
Climate Change	Considered to be a systemic risk	Annual Review of RLAM 'Responsible Investment Strategy' undertaken in November 2023

Expected Return on Investments

Asset	Return Characteristics	2023/24 Performance
Equities	Strong positive return relative to inflation over the longer-term but tend to be the most volatile asset class over the shorter term	Equities outperformed Inflation (measured by the Retail Prices Index RPI) over the year.
Property	Should achieve a positive return relative to inflation over the longer term which lower than that for equities but with a lower level of short-term volatility	The commercial property market significantly underperformed Inflation over the year.
Corporate Bonds	Should achieve a positive return relative to inflation over the longer term which lower than that for equities and property but with a lower level of short-term volatility	Corporate Bonds made a positive return over the year, though underperforming equity markets but out performing inflation and cash over the year.
Gilts (Government Bonds)	Should achieve a positive return relative to inflation over the longer term which lower than that for equities, property	Gilts performed poorly in relation to equities, Corporate Bonds. Though outperformed Property & Inflation.

	and Corporate Bonds but with a lower level of short-term volatility	
Index Linked Gilts	Should achieve a return in line with inflation over the longer-term but with a lower level of short-term volatility than equities, property and corporate bonds	Index Linked Gilts provided a negative return. They underperformed inflation by a significant margin
Cash	Should achieve a positive return which may not always keep pace with inflation, while normally providing a minimal level of volatility and a high degree of capital security	Cash provided a positive return, outperforming Gilts, Inflation & Property but underperformed Equities, Multi-Asset Funds & Corporate Bonds.
Multi-Asset Funds	Invest in a mix of asset classes with the objective of delivering a positive return relative to inflation over the longer-term, with lower level of volatility than equities	Mixed Asset Funds provided a Positive return. They underperformed pure equity stock and Corporate Bonds but outperformed fixed interest stock and inflation.



30/06/2023 - 28/06/2024 Data from FE fundinfo 2024

Realisation of Investments

Defined Benefit Considerations

One member elected to accept a Cash Equivalent Transfer Value of their Defined Benefit assets and the Trustees were required to make top up or 'Contingency' Payments to the support the calculated valuations. This payment was secured by managing cash liquidity throughout the year according to prior knowledge of possible calls on Trustee Funds.

All GMP's commencing throughout the year were provided via scheme pensioner payroll function as opposed to the purchase of annuities. In the scheme year 1st July 2023 to 30th June 2024 annuity rates represent good value however the Trustees have been advised that the purchase of annuities may be prohibited until GMP Equalisation for the scheme is completed.

Monitoring

Asset performance against Benchmark returns were reviewed at formal Trustee Meetings in July 2023, November 2023, March 2024 & June 2024.

A fixed agenda point at all meeting is the prudence of Trustee investment in light of possible calls on Trustee capital, in the form of member transfers or retirements.

The Scheme Funding Report, providing the 3 yearly valuation of Defined Benefit Assets of the scheme at 1st July 2021, highlighted that the Trustees may wish to consider a more conservative investment approach given the age profile of scheme members, in conjunction with updated scheme valuations from July 2022 & July 2023.

The investment risk profile of the scheme has been of benefit in recent market conditions however the Trustees have taken on board the need to shore up the current funding position of the scheme and have completed a process of reducing risk in relation to Defined Benefit Funds.

Environmental, Social & Corporate Governance Factors (ESG)

The Trustees undertake an annual review of the Royal London 'Stewardship and Responsible Investment Activity Report 2023'.

The Guiding Principle behind the Royal London Investment Philosophy is to 'seek to maximise long term risk adjusted investment returns for their customers in a responsible way, recognising that their customers will live in the society we mutually help to create'.

This Principle is partly achieved through ESG Integration. This is the systemic and explicit inclusion of ESG factors into investment analysis and investment decisions.

This means understanding which of these factors may impact future performance of investments, and in turn taking the appropriate steps to minimise any negative impact they may have. Royal London has a robust and repeatable process for integrating ESG factors.

To assess companies, they use quantitative data from a range of sources. This is followed by qualitative analysis by the fund management team. Research is then implemented in stock selection.

The result is an investment decision being made informed by ESG analysis, and this analysis can be used as a tool to inform ongoing stewardship duties through targeted engagements and voting activities.

Exercise of Investment Rights

As assets of the scheme across both Defined Benefit and Defined Contribution sections are invested completely in pooled arrangements the Trustees are not able to directly exercise their voting rights.

While we are not in a position to exercise our voting rights this does not mean that the way these voting rights are used is not important. The Trustees have reviewed the voting practises of Royal London Asset Management (RLAM) to confirm that the company is acting in a Responsible and Sustainable manner.

Royal London will only work with asset managers who are signatories to the United Nations (UN) Principles for Responsible Investment (PRI) and UK Stewardship Code.

All RLAMs votes are published online as well as their voting policies and are included in the Stewardship & RI activity report reviewed by the Trustees. This report can be reviewed at the following link:

[Royal London Asset Management Stewardship report](#)

The Trustees are comfortable that RLAM has a strong history of engagement and a firm belief in ESG issues.

The Trustees will continue to monitor Royal London's approach to responsible investment and stewardship. It is a standing agenda item in the Trustee Business Plan for Autumn of every scheme year.

Known Departures from SIP

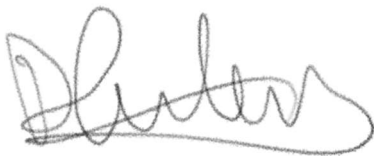
There were no known departures from the SIP in the scheme year under review.

Conclusion

Following our review and analysis, the Trustees believe that the SIP has been followed during the year.

I confirm that the above statement has been produced by the Trustees to the best of our knowledge.

Signed for and on behalf of the Trustees of Crossroads Commercials Limited Retirement Benefits Scheme:



David Crowley
Chair of Trustee Board

Date: 05/12/2024