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*The Nelson Hurst Group Pension Scheme 4*

Trustee's annual report and financial statements for the year ended 30 April 2021

Registered number: 10180352

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for the year ended 30 April 2021****Table of Contents**

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**Trustee's annual report and financial statements  
for the year ended 30 April 2021**

**Trustee, Principal Employer and advisers**

<b>Trustee</b>	Lockton Pension Trustee Limited
<b>Trustee Directors</b>	J Coates S Coleman P G S Hornsby (Member Nominated Director) K Nithiananthan M Pulfer (Member Nominated Director)
<b>Scheme Actuary</b>	Kenneth Hardman, Lane Clark & Peacock LLP
<b>Principal Employer</b>	LIGS Limited
<b>Pension consultants and administrator</b>	Lane Clark & Peacock LLP
<b>Independent auditor</b>	KPMG LLP
<b>Investment managers</b>	Legal and General Assurance (Pensions Management) Limited
<b>Annuity provider</b>	Legal & General Investment Management
<b>AVC providers</b>	The Royal London Mutual Insurance Society Limited Standard Life Investments Limited
<b>Legal adviser</b>	Reed Smith LLP
<b>Banker</b>	Lloyds Bank plc
<b>Enquiries</b>	NH4 Administration Team Lane Clark & Peacock LLP St Paul's House St Paul's Hill Winchester SO22 5AB Email: NH4Admin@lcp.uk.com

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Trustee's report**

The Trustee is pleased to present its annual report on The Nelson Hurst Group Pension Scheme 4 ('the Scheme'), together with the financial statements of the Scheme for the year ended 30 April 2021.

**Constitution of the Scheme**

The Scheme was established on 28 April 1992 and provides defined benefit pension and lump sum benefits payable to members on their retirement from the Group of companies ('the Group') for which LIGS Limited is the Principal Employer.

Benefits are provided under a Deed of Alteration dated 21 February 2005, copies of which can be seen by contacting Human Resources at the Principal Employer's address. In addition, a Deed of Clarification was executed (dated 7 February 2005) to clearly define certain time periods within the Trust Deed and Rules relating to the calculation of pensionable service.

The Scheme is a registered scheme under Chapter 2 of the Finance Act 2004.

The Scheme was closed to new members with effect from 1 October 1998. The Scheme closed to future accrual with effect from 30 April 2012 and all active members became deferred from that date.

On 2 November 2010, the Trustee made an investment decision to purchase an annuity contract with Legal & General Investment Management ('LGIM') in respect of the Scheme's existing liabilities to pensioners. After the Scheme's administrators completed a data validation exercise, the Trustee signed the annuity contract confirming the purchase in respect of the bulk of the pensioners on 21 May 2012.

The Scheme is supported by two PPF guaranteed agreements, one dated 18 March 2009 provided by Lockton Companies International Limited and the other dated 20 March 2011 provided by Lockton International Holdings Limited. In addition, the Trustee also has the benefit of a promissory note that was given by Lockton Inc. to Lockton Companies LLP for the purposes of meeting obligations to the Scheme which came into place with effect from 12 May 2015.

As part of the Lockton International Holdings Limited ('LIHL') purchase of an Italian based broker in February 2016 LIHL borrowed additional funds in the form of a term loan (of \$41m USD) from Lockton Inc. to finance the purchase. An agreement was made in February 2016 between the Scheme, LIHL and Lockton Inc. that the LIHL Group will at all times have available \$15m USD of available headroom in its cashflows on a 12 month look forward basis. Lockton Inc. will increase the size of the existing revolving credit facility with LIHL to ensure this headroom is maintained.

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Trustee's report continued****Management of the Scheme**

The Trustee of the Scheme during the year ended 30 April 2021 was Lockton Pension Trustee Limited.

The Trustee Directors of Lockton Pension Trustee Limited during the year to 30 April 2021 are listed on page 3.

The Trustee has the power to appoint or remove a director by ordinary resolution.

The Trustee has agreed a selection process to comply with the requirements of the Member Nominated Trustees (MNT) regulations of the Occupational Pension Scheme (Member Nominated Trustee and Directors) Regulations 2006. PGS Hornsby and M Pulfer have been selected as the MNT Directors of Lockton Pension Trustee Limited through this process.

The member elected directors may normally only be removed with the agreement of all the other directors. Any director may resign at any time by giving one month's notice in writing.

The Trustee Directors met three times throughout the year to consider matters relating to the administration of the Scheme and to receive reports from the investment managers.

**Financial statements and financial development of the Scheme**

The financial statements have been prepared and audited in accordance with regulations made under sections 41(1) and (6) of the Pensions Act 1995.

The fund account and statement of net assets (available for benefits) on pages 26 and 27 show that the value of the Scheme assets decreased by £9,587,504 to £198,136,323 during the year. The decrease was comprised of net withdrawals from dealings with members of £854,535 together with a net loss on investments of £8,732,969.

Further details of the financial developments of the Scheme may be found in the audited financial statements on pages 26 to 45.

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Trustee's report continued****Transfers values**

Cash equivalents paid during the year with respect to transfers have been calculated and verified in the manner prescribed by the Pension Schemes Act 1993 and in accordance with the regulations under the Occupational Pension Schemes (Transfer Values) (Amendment) Regulations 2008, Pensions Act 2004.

No discretionary benefits were included in the calculation of the transfer values.

**Pension increases**

Pensions in payment as at 1 May 2020 were given a 2.4% increase for pensionable service pre 6 April 1997 and for pensionable service after 5 April 2005. For pensionable service between 6 April 1997 and 5 April 2005, pensions were increased by 2.4%. A small number of pensioners received a guaranteed fixed 3% per annum increase in accordance with the Trust Deed and Rules.

Deferred pensions were increased in line with statutory requirements. No discretionary increases were awarded during the year.

**Life assurance**

Lump sum death in service benefits are insured under a group life policy underwritten by Aviva. The insurance premium is paid by LIGS Limited.

**Report on actuarial liabilities**

As required by Financial Reporting Standard 102, "The Financial Reporting Standard applicable in the United Kingdom and the Republic of Ireland" (FRS 102), the financial statements do not include liabilities in respect of promised retirement benefits.

Under section 222 of the Pensions Act 2004 every scheme is subject to the Statutory Funding Objective, which is to have sufficient and appropriate assets to cover its technical provisions, which represent the present value of benefits to which members are entitled based on pensionable service to the valuation date. This is assessed at least every 3 years using assumptions agreed between the Trustee and the Employer and set out in the Statement of Funding Principles.

The Scheme Actuary has reported on the Scheme's actuarial valuation as at 30 April 2020, which included the provision of the relevant actuarial statements and certificates. The results of the valuation were presented in a report dated 10 December 2020. The results indicated that the value of the assets of the Scheme as at 30 April 2020 were £210.7m which was £24.7m less than the amount necessary to cover the "technical provisions".

**Trustee's annual report and financial statements  
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**Trustee's report continued**

**Report on actuarial liabilities continued**

To eliminate this shortfall the Trustee and the Employer have agreed the following deficit funding contributions:

Amount	Dates
£8,000,000 pa	Between 1 May 2020 and 30 April 2023; and
£700,000	Between 1 May 2023 and 30 April 2024.

Contributions due before September 2021 will be paid directly into the Scheme. The Trustee and the Company are currently agreeing the terms of an escrow arrangement which subsequent contributions will be paid into (subject to agreement between the Trustee and Company on the terms of such escrow arrangement, failing which the contributions will be paid directly into the Scheme).

In addition, the Employer will continue to make payments to the Scheme to cover:

- the expenses of administering the Scheme;
- Pension Protection Fund levies; and
- the costs of granting early retirement on enhanced terms, ill health early retirement and benefit augmentations.

The next full valuation is to be carried out as at 30 April 2023 and is due to be completed no later than 31 July 2024.

**Trustee's annual report and financial statements  
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**Trustee's report continued**

**Report on actuarial liabilities continued**

**Method**

The 2020 valuation adopted the 'projected unit method', under which the technical provisions are calculated as the amount of assets required as at the valuation date to meet the projected cashflows, based on benefits accrued to the valuation date and the various assumptions made.

**Assumptions**

The technical provisions are calculated on the following key assumptions.

Key financial assumptions	% pa
Rate of price inflation:	
- Retail Price Index (RPI)	2.7
- Consumer Price Index (CPI) pre 2030	2.0
- CPI post 2030	2.7
Rate of investment return from gilts	0.5
Discount rates:	
- Pre-retirement	0.1
- Post-retirement	0.1
Rate of pension increases:	
- Price inflation capped at 5% pa	2.7
- Price inflation capped at 3% pa	2.2

**Mortality assumptions**

Post-retirement and pre-retirement mortality	<ul style="list-style-type: none"> <li>▪ 90% of S3NA; and</li> <li>▪ Projected from 2013 in line with the CMI 2019 core projections with a long-term annual rate of improvement of 2.0% (males) / 1.75% (females), a smoothing factor (S) of 7.5 and an initial mortality improvement (A) of 0.5%</li> </ul> <p>90% of male members and 75% of female members are assumed to have a civil partner at retirement or earlier death.</p>
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**Trustee's annual report and financial statements  
for the year ended 30 April 2021**

**Trustee's report continued**

**Membership**

The membership of the Scheme at the beginning and end of the year and changes during the year are set out below.

<b>Deferred members</b>	<b>2021</b>
Deferred members at the start of the year	<b>381</b>
Late movements	(2)
Transfers out	(6)
Retirements	(6)
Deferred members at the end of the year	<b>367</b>

<b>Pensioners</b>	<b>2021</b>
Pensioners at the start of the year	<b>249</b>
Late movements	2
New pensioners	6
New dependants	1
Deaths	(5)
Pensioners at the end of the year	<b>253</b>

Pensioners include 34 (2020: 33) dependants receiving a pension following the death of a member.

\* The late movements relate to prior year membership movement notified to the administrators subsequent to the year end.

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Trustee's report continued****Regulatory bodies**

The Pensions Ombudsman is appointed by the Secretary of State for the Department for Work and Pensions to investigate and determine any complaint or dispute of fact of law in relation to occupational pension schemes.

The Pensions Ombudsman can be contacted at:

10 South Colonnade  
Canary Wharf  
London  
E14 4PU

Tel: 0800 917 4487

[www.pensions-ombudsman.org.uk](http://www.pensions-ombudsman.org.uk)

The Pensions Regulator is responsible for occupational pension schemes and enforcing the law that relates to them. It has wide ranging powers which include the ability to:

- suspend, disqualify and remove trustees for consistently not carrying out their duties;
- wind up schemes where necessary;
- apply for information to prevent the misuse and misappropriation of scheme assets and apply for restitution where necessary; and
- take action to prevent schemes being left in deficit with nobody to meet the liability.

The Trustee, its advisers, the Employer and anyone connected with the administration of the Scheme have a statutory duty to report in writing to The Pensions Regulator if there are any breaches of legislation which are deemed to be materially significant to The Pensions Regulator.

**Trustee's annual report and financial statements  
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**Trustee's report continued**

**Regulatory bodies continued**

The Pensions Regulator can be contacted at:

The Pension Regulator  
Napier House  
Trafalgar Place  
Brighton  
BN1 4DW

Tel: 0345 600 0707

[www.thepensionsregulator.gov.uk](http://www.thepensionsregulator.gov.uk)

The Pension Tracing Service is designed to help former members of pension schemes trace their benefits if they have lost contact with the pension scheme in question. The Pension Tracing Service can be contacted at:

The Pension Tracing Service  
The Pension Service 9  
Mail Handling Site A  
Wolverhampton  
WV98 1LU

Tel: 0800 731 0193

[www.gov.uk/find-pension-contact-details](http://www.gov.uk/find-pension-contact-details)

**Further information**

Any enquiries about the Scheme or a member's own pension position should be addressed to:

NH4 Administration Team  
Lane Clark & Peacock LLP  
St Paul's House  
St Paul's Hill  
Winchester  
SO22 5AB

Email: [NH4Admin@lcp.uk.com](mailto:NH4Admin@lcp.uk.com)

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Trustee's report continued****Internal Dispute Resolution Procedure (IDRP)**

Under the Pensions Act 1995, the Scheme is required to put in place and maintain an Internal Dispute Resolution Procedure (IDRP) to deal with members' disputes. Although the Trustee always tries to resolve disputes informally and swiftly, an IDRP has been put in place. The formal IDRP is a two-stage process and details can be obtained from the Trustee. In the first instance, complaints should be sent to the NH4 Administration Team at the address on the previous page.

**Investment management**

The investments of the Scheme are managed on behalf of the Trustee by the Scheme's investment managers:

- Legal and General Assurance (Pensions Management) Limited ("L&G")

The overall management of the Trustee's investments is the responsibility of the Trustee. However, the day-to-day management of the Scheme's asset portfolio is the responsibility of the investment managers and bulk annuity provider, who operate within the guidelines of their specific mandates.

**Custodial arrangements**

The Scheme does not have an appointed custodian. Custodial services are provided by the custodians of the pooled funds in which it invests:

- HSBC Bank Plc – L&G UK equity fund, corporate bond fund and gilt funds
- Northern Trust Fiduciary Services (Ireland) Limited – L&G LDI funds and sterling liquidity fund.

The custodians are responsible for the safe keeping, monitoring and reconciliation of documentation relating to the ownership of listed investments. Investments are held in the name of the custodians' nominee companies, in line with common practice for pension scheme investments.

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Trustee's report continued****Statement of Investment Principles**

In accordance with section 35 of the Pensions Act 1995, a Statement of Investment Principles ("SIP") has been produced by the Trustee following consultation with the Employer. The Trustee reviews the SIP at least once every three years, and after any significant change in investment strategy. The Employer, the appointed Investment Consultant, and the appointed Scheme Actuary are consulted during the review. A copy of the latest SIP is available online.

The SIP was last reviewed and updated in August 2020 to reflect the requirements of the 2019 SIP regulations which implement the European Union Shareholder Rights Directive, required to be included by 1 October 2020. This covers how the Trustee incentivises and monitors investment managers to ensure they act in line with the Trustee's policies (in terms of strategy, long-term performance, engagement, etc). The update also reflected the consolidation of the Scheme's assets onto L&G's investment platform, the investment in L&G's Buy & Maintain Credit Fund and the investment in L&G's 2058 Index-Linked Gilt Index Fund.

There were no material departures from the SIP over the Scheme year.

**Implementation statement**

The Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019 requires the Trustee to include an annual statement confirming the extent to which the Trustee has followed their SIP, including details of any reviews or subsequent changes to the SIP during the Scheme year.

The Implementation Statement relating to the Scheme which forms part of this Trustee's report is on pages 49 to 51.

**Investment strategy**

The broad investment objectives are agreed by the Trustee, having consulted with the Employer. Within the context of these risk and return objectives, the Trustee, taking advice from the Scheme's investment consultants, decides on the overall allocation of assets between the various asset classes, and selects the appropriate managers within each asset class.

The following tables detail the asset distribution at the financial year end by fund, excluding the bulk annuity policy, AVCs and net current assets.

**Trustee's report continued****Investment strategy continued**

<b>Fund</b>	<b>Asset class</b>	<b>Allocation as at 05 Apr 21 (£)</b>	<b>Allocation as at 05 Apr 20 (£)</b>
L&G Over 15y Gilts Index Fund	Fixed interest gilts	14,235,463	16,580,292
L&G AAA-AA-A Bonds-All Stocks Index Fund	Corporate bonds	17,787,145	17,801,916
L&G Buy & Maintain Credit Fund	Corporate bonds	22,071,335	5,011,004
L&G Over 5y Index-Linked Gilts Fund	Index-linked gilts	37,381,504	38,079,451
L&G Over 15yr Index-Linked Gilts Index Fund	Index-linked gilts	3,252,098	3,325,370
L&G 2035 Index-Linked Gilt Fund	Index-linked gilts	4,917,385	5,001,137
L&G 2050 Index-Linked Gilt Fund	Index-linked gilts	1,052,773	-
L&G 2055 Index-Linked Gilt Fund	Index-linked gilts	8,632,331	8,869,113
L&G 2058 Index-Linked Gilt Fund	Index-linked gilts	2,969,569	3,054,083
L&G 2062 Index-Linked Gilt Fund	Index-linked gilts	1,048,962	-
L&G Matching Core Fixed Long Fund	LDI	10,645,643	18,222,704
L&G Matching Core Real Long Fund	LDI	14,213,776	15,092,356
L&G Sterling Liquidity Fund	Cash	8,218,071	6,488,443
L&G Pyrford Global Total Return Fund	Diversified growth	-	16,828,669
<b>Total Equities</b>		<b>146,426,055</b>	<b>154,354,538</b>

The investment strategy of the Scheme is to gradually increase the allocation to matching assets and corporate bonds as:

- the pensioner liability grows as a proportion of the total liabilities of the Scheme; and
- the on-going funding position of the Scheme improves.

The Trustee has decided that its investments should be managed on a passive basis, except for the diversified growth fund which was managed on an active basis (until July 2020).

The Scheme disinvested around £17m from Pyrford's Global Total Return Fund in July 2020, and invested the proceeds in L&G's Buy & Maintain Credit Fund as part of its de-risking strategy.

The Scheme accesses all of its pooled fund investments using L&G's Investment Platform.

**Trustee's annual report and financial statements  
for the year ended 30 April 2021**

**Trustee's report continued**

**Investment strategy continued**

In November 2020, the Scheme invested £1.4m into L&G's 2050 Index Linked Gilts Fund and L&G's 2062 Index Linked Gilts Fund to increase its interest rate and inflation hedging in November 2020 to around 95% of the Technical Provisions liabilities at that time. These two index-linked gilt funds are part of the existing fund range that the Scheme already invests in, however were chosen given these specific maturities better matched the shape of the Scheme's cashflow profile.

In April 2021, the Scheme invested £2.5m into L&G's Sterling Liquidity Fund, following notification from the administration team of there being excess cash in the Trustee bank account.

**Investment performance**

The performance of the Scheme's investments can be analysed as follows:

	1 Year %	3 Years pa %	5 Years pa %
Performance net of fees	-3.6	6.8	7.9

**Trustee's policies on environmental, social and governance ("ESG") and ethical factors**

The Trustee has considered how environmental, social, governance ("ESG") and ethical factors should be taken into account in the selection, retention and realisation of investments, given the time horizon of the Scheme and its members.

The Trustee expects its investment managers to take account of financially material considerations (including climate change and other ESG considerations). The Trustee seeks to appoint managers that have appropriate skills and processes to do this, and from time to time reviews how its managers are taking account of these issues in practice.

The Trustee has limited influence over managers' investment practices where assets are held in pooled funds, but it encourages its managers to improve their practices where appropriate.

The Trustee does not take into account any non-financial matters (ie matters relating to the ethical and other views of members and beneficiaries, rather than considerations of financial risk and return) in the selection, retention and realisation of investments.

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Trustee's report continued****Trustee's policies in relation to voting rights**

The Trustee recognises its responsibilities as owners of capital, and believes that good stewardship practices, including monitoring and engaging with investee companies, and exercising voting rights attaching to investments, protect and enhance the long-term value of investments. The Trustee has delegated to its investment managers the exercise of rights attaching to investments, including voting rights, and engagement with issuers of debt and equity and other relevant persons about relevant matters such as performance, strategy, capital structure, management of actual or potential conflicts of interest, risks and ESG considerations.

The Trustee does not monitor or engage directly with issuers or other holders of debt or equity. It expects the investment managers to exercise ownership rights and undertake monitoring and engagement in line with the managers' general policies on stewardship, as provided to the Trustee from time to time, considering the long-term financial interests of the beneficiaries. The Trustee has limited influence over managers' stewardship practices where assets are held in pooled funds, but it encourages its managers to improve their practices where appropriate.

**Trustee's policy on the implementation of asset manager arrangements**

Before investing in any manner, the Trustee obtains and considers proper written advice from its investment adviser on the question of whether the investment is satisfactory, having regard to the need for suitable and appropriately diversified investments.

The Trustee has signed agreements with the investment managers and a platform provider setting out in detail the terms on which the portfolios are to be managed. The investment managers' primary role is the day-to-day investment management of the Scheme's investments.

The Trustee have limited influence over managers' investment practices because all the Scheme's assets are held in pooled funds, but it encourages its managers to improve their practices where appropriate.

The Trustee's view is that the fees paid to the investment managers, and the possibility of their mandate being terminated, ensure they are incentivised to provide a high quality service that meets the stated objectives, guidelines and restrictions of the fund. However, in practice managers cannot fully align their strategy and decisions to the (potentially conflicting) policies of all their pooled fund investors in relation to strategy, long-term performance of debt/equity issuers, engagement and portfolio turnover.



**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Trustee's report continued****Trustee's policy on the implementation of asset manager arrangements continued**

It is the Trustee's responsibility to ensure that the managers' investment approaches are consistent with its/their policies before any new appointment, and to monitor and to consider terminating any existing arrangements that appear to be investing contrary to those policies. The Trustee expects investment managers, where appropriate, to make decisions based on assessments of the longer term financial and non-financial performance of debt/equity issuers, and to engage with issuers to improve their performance. It assesses this when selecting and monitoring managers.

The Trustee evaluate investment manager performance by considering performance over both shorter and longer-term periods as available. Except in closed-ended funds where the duration of the investment is determined by the fund's terms, the duration of a manager's appointment will depend on strategic considerations and the outlook for future performance. Generally, the Trustee would be unlikely to terminate a mandate on short-term performance grounds alone.

The Trustee's policy is to evaluate each of its investment managers by reference to the manager's individual performance as well as the role it plays in helping the Scheme meet its overall long-term objectives, taking account of risk, the need for diversification and liquidity. Each manager's remuneration, and the value for money it provides, is assessed in light of these considerations.

The Trustee recognises that portfolio turnover and associated transaction costs are a necessary part of investment management and that the impact of portfolio turnover costs is reflected in performance figures provided by the investment managers. The Trustee expects its investment consultant to incorporate portfolio turnover and resulting transaction costs as appropriate in its advice on the Scheme's investment mandates.

**Employer-related investment**

As at 30 April 2021 there were no assets invested in Employer-related investments in the Scheme, within the meaning of Section 40(2) of the Pensions Act 1995 and the Occupational Pension Schemes (Investment) Regulations 2005 (2020: £Nil).

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Trustee's report continued****GMP equalisation**

On 26 October 2018, the High Court handed down a judgment involving the Lloyds Banking Group's defined benefit pension schemes. The judgment concluded that schemes should be amended to equalise pension benefits for men and women in relation to guaranteed minimum pension benefits. The issues determined by the judgment arise in relation to many other defined benefit pension schemes. Subsequently, on 20 November 2020 the High Court ruled that historical individual transfers would also be due a top-up payment where the original transfer payment fell short of what it would have been had the inequalities in benefits from GMP been removed. The Trustee of the Scheme is working with the Principal Employer and its respective advisers to assess the adjustments to benefits required (if any). The impact on the Scheme of any backdated benefits and related interest that might be payable is not expected to be material to the financial statements. The Trustee has therefore not included a liability in respect of these matters in these financial statements. They will be accounted for in the year they are determined.

**COVID-19**

In early 2020, a new coronavirus, COVID-19 impacted a significant number of countries globally, COVID-19 has caused disruption to economic activity which has been reflected in recent fluctuations in global stock market and, in turn, in the valuation of Scheme's assets. The Trustee has designed and implemented the Scheme's investment strategy taking a long-term view and has built in resilience to withstand short term fluctuations. The Trustee continues to work with the administrator to ensure the continued smooth running of the Scheme.

**Statement of Trustee's responsibilities**

The audited financial statements, which are to be prepared in accordance with UK Generally Accepted Accounting Practice (UK GAAP), including FRS 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland, are the responsibility of the Trustee. Pension scheme regulations require the Trustee to make available to Scheme members, beneficiaries and certain other parties, audited financial statements for each Scheme year which:

- show a true and fair view, of the financial transactions of the Scheme during the Scheme year and of the amount and disposition at the end of the Scheme year of the assets and liabilities, other than liabilities to pay pensions and benefits after the end of the Scheme year; and
- contain the information specified in the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, including a statement whether the accounts have been prepared in accordance with the Statement of Recommended Practice, 'Financial Reports of Pension Schemes'.

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Trustee's report continued****Statement of Trustee's responsibilities continued**

The Trustee has supervised the preparation of the financial statements and has agreed suitable accounting policies, to be applied consistently, making estimates and judgements on a reasonable and prudent basis. They are also responsible for:

- assessing the Scheme's ability to continue as a going concern, disclosing, as applicable, matters related to going concern;
- using the going concern basis of accounting unless they either intend to wind up the Scheme, or have no realistic alternative but to do so; and
- making available each year, commonly in the form of a Trustee's annual report, information about the Scheme prescribed by pensions legislation, which they should ensure is fair and impartial.

The Trustee also has certain responsibilities in respect of contributions which are set out in the statement of Trustee's responsibilities accompanying the Trustee's Summary of Contributions.

The Trustee is responsible for such internal control as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error, and have a general responsibility for ensuring that adequate accounting records are kept and for taking such steps as are reasonably open to them to safeguard the assets of the Scheme and to prevent and detect fraud and other irregularities.

Signed for and on behalf of the Trustee:

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Trustee Director

Date: \_\_\_\_\_

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Trustee Director

Date: \_\_\_\_\_

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Independent Auditor's report to the Trustee of The Nelson Hurst Group Pension Scheme 4****Opinion**

We have audited the financial statements of The Nelson Hurst Group Pension Scheme 4 for the year ended 30 April 2021 which comprise the Fund Account and the Statement of Net Assets (available for benefits) and related notes, including the accounting policies in note 3.

In our opinion the financial statements:

- show a true and fair view of the financial transactions of the Scheme during the Scheme year ended 30 April 2021 and of the amount and disposition at that date of its assets and liabilities, other than liabilities to pay pensions and benefits after the end of the Scheme year;
- have been properly prepared in accordance with UK accounting standards, including FRS 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland; and
- contain the information specified in Regulation 3 of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, made under the Pensions Act 1995.

**Basis for opinion**

We conducted our audit in accordance with International Standards on Auditing (UK) ("ISAs (UK)") and applicable law. Our responsibilities are described below. We have fulfilled our ethical responsibilities under, and are independent of the scheme in accordance with, UK ethical requirements including the FRC Ethical Standard. We believe that the audit evidence we have obtained is a sufficient and appropriate basis for our opinion.

**Going concern**

The Trustee has prepared the financial statements on the going concern basis as it does not intend to wind up the Scheme, and it has concluded that the Scheme's financial position means that this is realistic. It has also concluded that there are no material uncertainties that could have cast significant doubt over its ability to continue as a going concern for at least a year from the date of approval of the financial statements ("the going concern period").

In our evaluation of the Trustee's conclusions, we considered the inherent risks to the Scheme and analysed how those risks might affect the Scheme's financial resources or ability to continue operations over the going concern period.

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Independent Auditor's report to the Trustee of The Nelson Hurst Group Pension Scheme 4 continued****Going concern continued**

Our conclusions based on this work:

- we consider that the Trustee's use of the going concern basis of accounting in the preparation of the financial statements is appropriate;
- we have not identified, and concur with the Trustee's assessment that there is not, a material uncertainty related to events or conditions that, individually or collectively, may cast significant doubt on the Scheme's ability to continue as a going concern for the going concern period.

However, as we cannot predict all future events or conditions and as subsequent events may result in outcomes that are inconsistent with judgements that were reasonable at the time they were made, the absence of reference to a material uncertainty in this auditor's report is not a guarantee that the Scheme will continue in operation.

**Fraud and breaches of laws and regulations – ability to detect***Identifying and responding to risks of material misstatement due to fraud*

To identify risks of material misstatement due to fraud ("fraud risks") we assessed events or conditions that could indicate an incentive or pressure to commit fraud or provide an opportunity to commit fraud. Our risk assessment procedures included:

- Enquiring of the Trustee's and inspection of policy documentation, including the conflicts of interest register and conflicts policies, as to the Scheme's high-level policies and procedures to prevent and detect fraud, as well as enquiring whether they have knowledge of any actual, suspected or alleged fraud.
- Reading Trustee Board minutes.

We communicated identified fraud risks throughout the audit team and remained alert to any indications of fraud throughout the audit.

As required by auditing standards, we perform procedures to address the risk of management override of controls, in particular the risk that Trustee (or their delegates including the Scheme administrator) may be in a position to make inappropriate accounting entries. On this audit we do not believe there is a fraud risk related to revenue recognition because revenue in a pension scheme relates to contributions receivable as paid under an agreed schedule or pre-determined by the Trustee; there are no subjective issues or judgements required.

We did not identify any additional fraud risks.

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Independent Auditor's report to the Trustee of The Nelson Hurst Group Pension Scheme 4 continued****Fraud and breaches of laws and regulations – ability to detect continued***Identifying and responding to risks of material misstatement due to fraud continued*

We performed procedures including:

- Identifying journal entries to test based on risk criteria and comparing the identified entries to supporting documentation. These included those posted after the first draft of the financial statements have been prepared.

*Identifying and responding to risks of material misstatement due to non-compliance with laws and regulations*

We identified areas of laws and regulations that could reasonably be expected to have a material effect on the financial statements from our general commercial and sector experience and through discussion with the Trustee (as required by auditing standards), and from inspection of the Scheme's regulatory and legal correspondence and discussed with the Trustee the policies and procedures regarding compliance with laws and regulations.

As the Scheme is regulated by The Pensions Regulator, our assessment of risks involved gaining an understanding of the control environment including the Scheme's procedures for complying with regulatory requirements and reading the minutes of Trustee meetings.

We communicated identified laws and regulations throughout our team and remained alert to any indications of non-compliance throughout the audit.

The potential effect of these laws and regulations on the financial statements varies considerably.

Firstly, the Scheme is subject to laws and regulations that directly affect the financial statements including financial reporting legislation (including related pensions legislation) and we assessed the extent of compliance with these laws and regulations as part of our procedures on the related financial statement items.

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Independent Auditor's report to the Trustee of The Nelson Hurst Group Pension Scheme 4 continued****Fraud and breaches of laws and regulations – ability to detect continued***Identifying and responding to risks of material misstatement due to non-compliance with laws and regulations continued*

Secondly, the Scheme is subject to other laws and regulations where the consequences of non-compliance could have a material effect on amounts or disclosures in the financial statements, for instance through the imposition of fines or litigation, or the loss of the Scheme's registration. We identified the following areas as those most likely to have such an effect: pensions legislation and data protection legislation, recognising the financial and regulated nature of the Scheme's activities and its legal form. Auditing standards limit the required audit procedures to identify non-compliance with these laws and regulations to enquiry of the Trustee and inspection of regulatory and legal correspondence, if any. Therefore if a breach of operational regulations is not disclosed to us or evident from relevant correspondence, an audit will not detect that breach.

We have reported separately on contributions payable under the schedule of contributions in our statement about contributions on pages 46 and 47 of the annual report.

*Context of the ability of the audit to detect fraud or breaches of law or regulation*

Owing to the inherent limitations of an audit, there is an unavoidable risk that we may not have detected some material misstatements in the financial statements, even though we have properly planned and performed our audit in accordance with auditing standards. For example, the further removed non-compliance with laws and regulations is from the events and transactions reflected in the financial statements, the less likely the inherently limited procedures required by auditing standards would identify it.

In addition, as with any audit, there remained a higher risk of non-detection of fraud, as these may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal controls. Our audit procedures are designed to detect material misstatement. We are not responsible for preventing non-compliance or fraud and cannot be expected to detect non-compliance with all laws and regulations.

**Other information**

The Trustee is responsible for the other information, which comprises the Trustee's report (including the report on actuarial liabilities, the Implementation Statement and the Summary of Contributions), and the actuarial certification of the Schedule of Contributions. Our opinion on the financial statements does not cover the other information and, accordingly, we do not express an audit opinion or any form of assurance conclusion thereon in this report.

**Independent Auditor's report to the Trustee of The Nelson Hurst Group Pension Scheme 4 continued****Other information continued**

Our responsibility is to read the other information and, in doing so, consider whether, based on our financial statements audit work, the information therein is materially misstated or inconsistent with the financial statements or our audit knowledge. Based solely on this work we have not identified material misstatements in the other information.

**Trustee's responsibilities**

As explained more fully in their statement set out on pages 18 and 19, the Scheme's Trustee is responsible for: supervising the preparation of financial statements which show a true and fair view; such internal control as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error; assessing the Scheme's ability to continue as a going concern, disclosing, as applicable, matters related to going concern; and using the going concern basis of accounting unless they either intend to wind up the Scheme, or have no realistic alternative but to do so.

**Auditor's responsibilities**

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue our opinion in an auditor's report. Reasonable assurance is a high level of assurance, but does not guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

A fuller description of our responsibilities is provided on the FRC's website at [www.frc.org.uk/auditorsresponsibilities](http://www.frc.org.uk/auditorsresponsibilities).



**Independent Auditor's report to the Trustee of The Nelson Hurst Group Pension Scheme 4 continued****The purpose of our audit work and to whom we owe our responsibilities**

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

**Signature:****Dated:**

Pamela Marco  
For and on behalf of KPMG LLP, Statutory Auditor  
Chartered Accountants  
Challenge House  
Sherwood Drive  
Bletchley  
Milton Keynes  
MK3 6DP

## Fund account

	Note	2021 £	2020 £
<b>Contributions and benefits</b>			
Employer contributions	4	8,000,000	8,000,000
Other income	5	<u>2,388</u>	<u>5,626</u>
		<u>8,002,388</u>	<u>8,005,626</u>
Benefits paid or payable	6	(3,207,534)	(2,854,812)
Payments to and on account of leavers	7	(5,649,363)	(5,575,702)
Administrative expenses	8	<u>(26)</u>	<u>(713)</u>
		<u>(8,856,923)</u>	<u>(8,431,227)</u>
<b>Net withdrawals from dealings with members</b>		<u>(854,535)</u>	<u>(425,601)</u>
<b>Returns on investments</b>			
Investment income	9	2,218,235	2,200,571
Change in market value of investments	10	(10,794,855)	27,184,591
Investment management expenses	12	<u>(156,349)</u>	<u>(137,596)</u>
<b>Net return on investments</b>		<u>(8,732,969)</u>	<u>29,247,566</u>
<b>Net (decrease)/increase in the fund during the year</b>		(9,587,504)	28,821,965
<b>Net assets of the Scheme</b>			
<b>At 1 May</b>		<u>207,723,827</u>	<u>178,901,862</u>
<b>At 30 April</b>		<u>198,136,323</u>	<u>207,723,827</u>

The notes on pages 28 to 45 form part of these financial statements.

**Trustee's annual report and financial statements  
for the year ended 30 April 2021**

**Statement of net assets (available for benefits)**

	Note	2021 £	2020 £
<b>Investment assets</b>			
Pooled investment vehicles	10/14	146,426,055	154,354,538
Insurance policies	10/16	49,260,000	48,590,000
AVC investments	10/17	<u>874,709</u>	<u>728,526</u>
<b>Total investments</b>		<u>196,560,764</u>	<u>203,673,064</u>
<b>Current assets</b>	20	1,616,410	4,097,763
<b>Current liabilities</b>	21	<u>(40,851)</u>	<u>(47,000)</u>
<b>Net assets of the Scheme at 30 April</b>		<u>198,136,323</u>	<u>207,723,827</u>

The notes on pages 28 to 45 form part of these financial statements.

The financial statements summarise the transactions of the Scheme and deal with the net assets at the disposal of the Trustee. They do not take account of obligations to pay pensions and benefits which fall due after the end of the Scheme year. The actuarial position of the Scheme, which takes into account such obligations, is dealt with in the report on actuarial liabilities on page 6 to 8 of the Trustee's report and these financial statements should be read in conjunction with this report.

These financial statements were approved for and on behalf of the Trustee by:

\_\_\_\_\_  
Trustee Director

Date: \_\_\_\_\_

\_\_\_\_\_  
Trustee Director

Date: \_\_\_\_\_

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Notes to the financial statements****1. Basis of preparation**

The individual financial statements have been prepared in accordance with the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, Financial Reporting Standard 102 – The Financial Reporting Standard applicable in the UK and Republic of Ireland, and the guidance set out in the Statement of Recommended Practice (Revised 2018).

The financial statements have been prepared on the going concern basis. At the date of signing these financial statements the Trustee believes that; due the funding position of the Scheme and the strength of the employer covenant, the Scheme is able to comfortably cover its related outgoings for at least 12 months following the date of approval of the financial statements.

The Trustee in its assessment has considered the funding level of the Scheme which is funded at 93% on 30 April 2021. The recovery plan in place aims to eliminate the deficit by 2024. The Trustee has reviewed the employer covenant and has no concerns over the payment of contributions due from the Employer, as the Employer has access to funding available from the Lockton Group's intercompany credit facility with Lockton Inc. In addition to which there is a line of credit of \$15m with the ultimate parent, Lockton Inc, should the Employer be unable to fulfil its financial obligations.

As a result the Trustee considers the preparation of the financial statements on a going concern basis to be appropriate. The Trustee is therefore confident that the Scheme will have sufficient funds to continue to meet its liabilities as they fall due, for at least 12 months from the date of approval of the financial statements.

**2. Identification of the financial statements**

The Scheme is established as a trust under English law. The Scheme is a registered pension scheme for tax purposes. It is therefore exempt from UK income and capital gains taxes. The Scheme is a defined benefit occupational pension scheme, closed to new members and to future accrual. The address for enquires to the Scheme is included in the Trustee's Report on page 11.

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Notes to the financial statements continued****3. Accounting policies**

The principal accounting policies of the Scheme have been applied consistently and are as follows:

**3.1. Currency**

- The Scheme's functional currency and presentational currency is pounds sterling (GBP). Assets and liabilities in foreign currencies are expressed in sterling at the rates of exchange ruling at the year-end. Foreign currency transactions are translated into sterling at the spot exchange rate at the date of the transaction. Gains and losses arising on conversion or translation are dealt with as part of the change in market value of investments.

**3.2. Contributions**

Employer deficit funding contributions are accounted for on the due dates on which they are payable in accordance with the Schedule of Contributions and Recovery Plan under which they are being paid.

**3.3 Payments to and on account of leavers**

- Individual transfers out of the Scheme are accounted for on a cash basis which is when a member's liability is discharged.

**3.4. Benefits paid or payable**

- Pensions in payment, including pensions funded by annuity contracts are accounted for in the period to which they relate.
- Where members can choose whether to take their benefits as a full pension or as a lump sum with reduced pension, retirement benefits are accounted for on an accruals basis on the later of the date of retirement and the date the option is exercised.
- Other benefits are accounted for on an accruals basis on the date of retirement or death as appropriate.
- Where the Trustee agrees or is required to settle tax liabilities on behalf of a member (such as where lifetime or annual allowances are exceeded) with a consequent reduction in that member's benefits receivable from the Scheme, any taxation due is accounted for on the same basis as the event giving rise to the tax liability and shown separately within 'Benefits Paid or Payable'.

**3.5. Administrative and other payments**

- Administrative expenses are accounted for on an accruals basis.

**Notes to the financial statements continued****3. Accounting policies continued****3.6. Investment income and change in market value**

- Investment income arising from the underlying investments of the pooled investment vehicles which do not distribute income is rolled up and reinvested within the pooled investment vehicles. This is reflected in the unit price and reported within 'Change in market value'.
- Receipts from annuity policies held by the Trustee to fund benefits payable to Scheme members are included within investment income on an accruals basis.
- The change in market value of investments during the year comprises all increases and decreases in the market value of investments held at any time during the year, including profits and losses realised on sales of investments during the year.

**3.7. Investment management expenses and transaction costs**

- Investment management expenses and rebates are accounted for on an accruals basis and shown net within investment returns.

**3.8. Investment assets/liabilities**

- Unitised pooled investment vehicles have been valued at the latest available bid price or single price provided by the pooled investment manager. Shares in other pooled arrangements have been valued at the latest available net asset value (NAV), determined in accordance with fair value principles, provided by the pooled investment manager.
- Annuities purchased in the name of the Trustee which fully provide the pension benefits for certain members are included in these financial statements at the amount of the related obligation, determined at the present value of the related obligations as valued by the insurance provider.
- With profits insurance policies (including those held as AVC investments) are reported at the policy value provided by the insurer based on cumulative reversionary bonuses declared and the current terminal bonus.

**3.9. Key accounting estimates and assumptions**

- The Trustee makes estimates and assumptions concerning the future. The resulting accounting estimates will, by definition, seldom equal the related actual results. For the Scheme, the Trustee believes the only estimates and assumptions that have a significant risk of causing a material adjustment to the carrying amount of assets and liabilities within the next financial year are related to the valuation of the insurance policies.

## Notes to the financial statements continued

## 4. Contributions

	2021 £	2020 £
Employer contributions:		
Deficit funding	<u>8,000,000</u>	<u>8,000,000</u>

In accordance with the Schedule of Contributions dated 10 December 2020, £8,000,000 per annum is due between 1 May 2020 and 30 April 2023, paid monthly in arrears, in equal instalments. £700,000 is due between 1 May 2023 and 30 April 2024.

## 5. Other Income

	2021 £	2020 £
Sundry income	<u>2,388</u>	<u>5,626</u>

## 6. Benefits paid or payable

	2021 £	2020 £
Pensions	2,895,447	2,800,151
Commutation of pensions and lump sum retirement benefits	307,138	54,661
Lump sum death benefits	<u>4,949</u>	<u>-</u>
	<u>3,207,534</u>	<u>2,854,812</u>

**Notes to the financial statements continued****7. Payments to and on account of leavers**

	2021 £	2020 £
Payments for members joining state scheme	-	(97)
Individual transfers out to other schemes	5,649,363	5,575,799
	<u>5,649,363</u>	<u>5,575,702</u>

**8. Administrative expenses**

	2021 £	2020 £
Bank and sundry charges	<u>26</u>	<u>713</u>

With the exception of bank charges and investment fees all costs of administration are borne by the Principal Employer, LIGS Limited.

**9. Investment income**

	2021 £	2020 £
Annuity income	2,215,333	2,193,168
Interest on cash deposits	2,902	7,403
	<u>2,218,235</u>	<u>2,200,571</u>



**Notes to the financial statements continued****10. Reconciliation of investments**

Reconciliation of investments held at the beginning and the end of the year:

	Value at 30 April 2020 £	Purchases at cost £	Sales proceeds £	Change in market value £	Value at 30 April 2021 £
<b>Pooled investment vehicles</b>					
L&G	154,354,538	23,140,086	(19,452,583)	(11,615,986)	146,426,055
	<u>154,354,538</u>	<u>23,140,086</u>	<u>(19,452,583)</u>	<u>(11,615,986)</u>	<u>146,426,055</u>
<b>Insurance policies</b>					
LGIM	48,590,000	-	-	670,000	49,260,000
<b>AVC investments</b>					
Royal London	171,716	-	-	36,094	207,810
Standard Life	556,810	-	(4,948)	115,037	666,899
	<u>728,526</u>	<u>-</u>	<u>(4,948)</u>	<u>151,131</u>	<u>874,709</u>
<b>Total</b>	<u>203,673,064</u>	<u>23,140,086</u>	<u>(19,457,531)</u>	<u>(10,794,855)</u>	<u>196,560,764</u>

**11. Transaction costs**

Transaction costs are included in the cost of purchases and deducted from sale proceeds. There were no direct transaction costs during the year (2020: £Nil). Indirect costs incurred through the bid-offer spread on investments within pooled investment vehicles and charges made within those vehicles. The amount of indirect cost is not separately provided to the Scheme.

**Trustee's annual report and financial statements  
for the year ended 30 April 2021**

**Notes to the financial statements continued**

**12. Investment management expenses**

	2021 £	2020 £
Administration, management and custody	<u>156,349</u>	<u>137,596</u>

**13. Taxation**

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

**14. Pooled investment vehicles**

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

	2021 £	2020 £ (Reanalysed)
Fixed interest gilts	14,235,463	16,580,292
Bonds	39,858,480	22,812,920
Index-linked gilts	59,254,622	58,329,154
Diversified growth	-	16,828,669
Liability driven investments	24,859,419	33,315,060
Cash funds	<u>8,218,071</u>	<u>6,488,443</u>
	<u>146,426,055</u>	<u>154,354,538</u>

**Trustee's annual report and financial statements  
for the year ended 30 April 2021**

**Notes to the financial statements continued**

**15. Concentration of investments**

The following investments represent more than 5% of the net assets of the Scheme.

	2021		2020	
	£	%	£	%
LGIM Annuity Policy	49,260,000	25	48,590,000	23
L&G Over 5y Index-Linked Gilts Fund	37,381,504	19	38,079,451	18
L&G CAAG Buy & Maintain Credit*	22,071,335	11	-	-
L&G AAA-AA-A Bonds-All Stocks Index Fund	17,787,145	9	17,801,916	9
L&G Pyrford Global Total Return Fund	N/A	N/A	16,828,669	8
L&G Over 15y Gilts Index Fund	14,235,463	7	16,580,292	8
L&G Matching Core Real Long Fund	14,213,776	7	15,092,356	7
L&G Matching Core Fixed Long Fund	10,645,643	5	18,222,704	9

N/A – funds sold in the year

\* funds under 5% of net assets of the Scheme

**16. Insurance policies**

The Scheme held insurance policies at the year-end as follows:

	2021	2020
	£	£
LGIM	<u>49,260,000</u>	<u>48,590,000</u>

**17. Additional Voluntary Contributions (AVCs)**

The Trustee holds assets invested separately from the main fund securing additional benefits on a money purchase basis for those members electing to pay additional voluntary contributions. Members participating in this arrangement each receive an annual statement confirming the amounts held in their account and the movements in the year. The aggregate amounts of AVC investments, which are invested in unit-linked funds, are shown in note 10.

## Notes to the financial statements continued

## 18. Fair value hierarchy

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

- Level 1: The unadjusted quoted price in an active market for identical assets or liabilities that the entity can access at the measurement date.
- Level 2: Inputs other than quoted prices included within Level 1 that are observable (ie developed using market data) for the asset or liability, either directly or indirectly.
- Level 3: Inputs are unobservable (ie for which market data is unavailable) for the asset or liability.

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

At 30 April 2021	Level 1 £	Level 2 £	Level 3 £	Total £
Pooled investment vehicles	-	146,426,055	-	146,426,055
Insurance policies	-	-	49,260,000	49,260,000
AVC investments	-	30,644	844,065	874,709
	-	146,456,699	50,104,065	196,560,764

At 30 April 2020	Level 1 £	Level 2 £	Level 3 £	Total £
Pooled investment vehicles	-	154,354,538	-	154,354,538
Insurance policies	-	-	48,590,000	48,590,000
AVC investments	-	30,644	697,882	728,526
	-	154,385,182	49,287,882	203,673,064

**Notes to the financial statements continued****19. Investment risks**

FRS 102 requires the disclosure of information in relation to certain investment risks. These risks are set out by FRS 102 as follows:

- Credit risk: this is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation.
- Market risk: this comprises currency risk, interest rate risk and other price risk.
  1. Currency risk: this is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in foreign exchange rates.
  2. Interest rate risk: this is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in market interest rates.
  3. Other price risk: this is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in market prices (other than those arising from interest rate risk or currency risk), whether those changes are caused by factors specific to the individual financial instrument or its issuer, or factors affecting all similar financial instruments traded in the market.

The Trustee determined the Scheme's investment strategy after obtaining written professional advice from its professional investment adviser. The Scheme has exposure to the aforementioned risks because of the investments held to implement the investment strategy. The Trustee manages investment risks, including credit risk and market risk, considering the Scheme's investment objectives and strategy, and the advice of its investment advisers.

Within each investment portfolio, investment objectives and restrictions to manage risk are implemented through the legal agreements in place with the Scheme's investment managers. The Trustee monitors the performance of the strategy and associated risks, and each investment manager against its objectives and restrictions, on a regular basis.

Further information on these risks and the Trustee's approach to risk management is set out below. This does not include the AVC investments, as these are not considered significant in relation to the overall investments of the Scheme.

## Notes to the financial statements continued

## 19. Investment risks continued

## Investment strategy

The broad investment objectives are agreed by the Trustee, having consulted with the Employer. Within the context of these risk and return objectives, the Trustee, taking advice from the Scheme's investment consultants, decides on the overall allocation of assets between the various asset classes, and selects the appropriate managers within each asset class.

The following table detail the asset distribution at the financial year end by fund, excluding the bulk annuity policy, AVCs and net current assets.

Fund	Asset class	Allocation as at 05 Apr 21 (£)	Allocation as at 05 Apr 20 (£)
L&G Over 15y Gilts Index Fund	Fixed interest gilts	14,235,463	16,580,292
L&G AAA-AA-A Bonds-All Stocks Index Fund	Corporate bonds	17,787,145	17,801,916
L&G Buy & Maintain Credit Fund	Corporate bonds	22,071,335	5,011,004
L&G Over 5y Index-Linked Gilts Fund	Index-linked gilts	37,381,504	38,079,451
L&G Over 15yr Index-Linked Gilts Index Fund	Index-linked gilts	3,252,098	3,325,370
L&G 2035 Index-Linked Gilt Fund	Index-linked gilts	4,917,385	5,001,137
L&G 2050 Index-Linked Gilt Fund	Index-linked gilts	1,052,773	-
L&G 2055 Index-Linked Gilt Fund	Index-linked gilts	8,632,331	8,869,113
L&G 2058 Index-Linked Gilt Fund	Index-linked gilts	2,969,569	3,054,083
L&G 2062 Index-Linked Gilt Fund	Index-linked gilts	1,048,962	-
L&G Matching Core Fixed Long Fund	LDI	10,645,643	18,222,704
L&G Matching Core Real Long Fund	LDI	14,213,776	15,092,356
L&G Sterling Liquidity Fund	Cash	8,218,071	6,488,443
L&G Pyrford Global Total Return Fund	Diversified growth	-	16,828,669
<b>Total pooled investment vehicles</b>		<b>146,426,055</b>	<b>154,354,538</b>

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Notes to the financial statements continued****19. Investment risks continued****Investment strategy continued**

The investment strategy of the Scheme is to gradually increase the allocation to matching assets and corporate bonds as:

- the pensioner liability grows as a proportion of the total liabilities of the Scheme; and
- the on-going funding position of the Scheme improves.

The Trustee has decided that its investments should be managed on a passive basis, except for the diversified growth fund which was managed on an active basis (until July 2020).

The Scheme disinvested around £17m from Pyrford's Global Total Return Fund in July 2020, and invested the proceeds in L&G's Buy & Maintain Credit Fund as part of its de-risking strategy.

The Scheme accesses all of its pooled fund investments using L&G's Investment Platform.

**Credit risk**

The Scheme is subject to credit risk through its investments in pooled investment vehicles. It is directly exposed to credit risk in relation to the solvency of the custodians of those funds. It is directly exposed to the credit risk of the insurance company for any pooled vehicles structured as life policies. The Scheme's bulk annuity policy is also directly exposed to the solvency of the insurer.

As at 30 April 2021 around 100% (2020: 100%) of the Scheme's assets were invested in funds or securities that are significantly exposed to direct credit risk.

The Scheme's holdings in pooled investment vehicles are 'unrated' from a credit perspective. Direct credit risk arising from pooled investment vehicles is mitigated by: the underlying assets of the pooled arrangements being ring-fenced from the assets of the custodian and the investment manager; the regulatory environments in which the pooled fund managers operate; and diversification of the Scheme's investments across a number of pooled funds. The Trustee carries out due diligence checks on investments into new pooled funds and on an ongoing basis monitors any changes to the operating environment of those pooled funds.

**Notes to the financial statements continued****19. Investment risks continued****Credit risk continued**

The Scheme's investments are all classified as unit linked insurance contracts, therefore the Scheme is directly exposed to credit risk in relation to the solvency of the insurance policy provider. The insurance policy provider is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. There is also direct credit risk associated with the Scheme's insured bulk annuity, which the Trustee considered before the policy was taken out. This risk is mitigated by the regulatory environment in which the insurer operates and the diversification of the policy's underlying assets.

The Scheme is indirectly exposed to credit risks arising from the underlying investments held by the pooled funds, for example where they invest in bonds. The indirect exposure to credit risk arises from all of the Scheme's investments. The amount invested in each mandate is shown in the table on page 43.

The managers of the pooled funds that invest in fixed income manage credit risk by having a diversified exposure to issuers, conducting thorough research on the probability of default of those issuers, and having only a limited exposure to securities rated below investment grade. The magnitude of credit risk within each fund will vary over time, as the manager changes the underlying investments in line with its views on markets, asset classes and specific securities.

A summary of pooled investment vehicles by type of arrangement is as follows:

	2021 £	2020 £
Unit linked insurance contracts	<u>146,426,055</u>	<u>154,354,538</u>

**Currency risk**

As the Scheme's liabilities are denominated in Sterling, any non-Sterling currency exposure within the assets presents additional currency risk.



**Notes to the financial statements continued****19. Investment risks continued****Currency risk continued**

Whilst the majority of the currency exposure of the Scheme's assets is to Sterling, the Scheme is subject to currency risk because some of the Scheme's investments are held in overseas markets. The Trustee considers the overseas currency exposure in the context of the overall investment strategy, and believes that the currency exposure that exists diversifies the strategy and is appropriate. Furthermore, the Trustee manages the amount of currency risk by investing in pooled funds that hedge some or all of their currency exposure, or implement separate currency hedging arrangements.

As at 30 April 2021 around 0% (2020: 11%) of the Scheme's assets were invested in funds or securities that are significantly exposed to currency risk.

All of the Scheme's pooled funds are accessed via a Sterling share class. Therefore the Scheme is not subject to direct currency risk. The Scheme's assets that were exposed to indirect currency risk are the Pyrford Global Total Return Fund, which invest in non-Sterling investments that are not currency hedged. The Scheme fully disinvested from this mandate over the Scheme year.

The exposure to foreign currencies within the pooled funds will vary over time as the manager changes the underlying investments, but is not expected to be a material driver of returns over the longer term. Decisions about the exposure to foreign currencies within the pooled funds held are at the discretion of the appointed fund managers.

**Interest rate and inflation rate risk**

Interest rate and inflation rate risk is a material risk for the Scheme given that movements in interest rates and inflation are a material influence on the value of the liabilities assessed in present day terms. Some of the Scheme's assets are subject to interest rate risk (both nominal and real interest rates). However, the overall interest rate exposure of the Scheme's assets hedges part of the corresponding risks associated with the Scheme's liabilities. The net effect will be to reduce the volatility of the funding level, and therefore the Trustee believes that it is appropriate to have exposure to interest rate risk in this manner.

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Notes to the financial statements continued****19. Investment risks continued****Interest rate and inflation rate risk continued**

The only assets the Scheme invests in with material exposure to changes in interest rates and/or inflation are the bulk annuity policy, index-linked gilt, fixed interest gilt, LDI and corporate bond holdings. Whilst still invested, the diversified growth fund may also have had some sensitivity to changing interest rates and inflation, but this sensitivity varied over time as the underlying investments change, and it is not expected to be a significant driver of returns due to the investment approach. The amount invested in each of these mandates is shown in the table on page 43.

As at 30 April 2021 around 94% (2020: 96%) of the Scheme's assets were invested in funds or securities that are significantly exposed to interest rate and/or inflation risk.

**Other price risk**

The Scheme's assets are exposed to risks of market prices other than currencies and interest rates, such as pooled funds that hold equities being subject to movements in equity prices.

As at 30 April 2021 none of the Scheme's assets were invested in funds or securities that are significantly exposed to other price risk (2020: 11%).

## Notes to the financial statements continued

## 19. Investment risks continued

## Credit and market risks

The table above summarises the Scheme's pooled investment vehicles that have significant exposure to indirect credit and market risks.

	Credit risk	Currency risk	Interest rate risk	Other price risk	2021 £	2020 £ Reanalysed
L&G Over 15y Gilts Index Fund	●	○	●	○	14,235,463	16,580,292
L&G Matching Core Fixed Long Fund	●	○	●	○	10,645,643	18,222,704
L&G Matching Core Real Long Fund	●	○	●	○	14,213,776	15,092,356
L&G Sterling Liquidity Fund	●	○	○	○	8,218,071	6,488,443
L&G AAA-AA-A Bonds-All Stocks Index Fund	●	○	●	○	17,787,145	17,801,916
L&G Buy & Maintain Credit Fund	●	○	●	○	22,071,335	5,011,004
L&G Over 5y Index-Linked Gilts Fund	●	○	●	○	37,381,504	38,079,451
L&G Over 15yr Index-Linked Gilts Index Fund	●	○	●	○	3,252,098	3,325,370
L&G 2035 Index-Linked Gilt Fund	●	○	●	○	4,917,385	5,001,137
L&G 2050 Index-Linked Gilt Fund	●	○	●	○	1,052,773	-
L&G 2055 Index-Linked Gilt Fund	●	○	●	○	8,632,331	8,869,113
L&G 2058 Index-Linked Gilt Fund	●	○	●	○	2,969,569	3,054,083
L&G 2062 Index-Linked Gilt Fund	●	○	●	○	1,048,962	-
L&G Pyrford Global Total Return Fund	●	●	●	●	-	16,828,669
<b>Total</b>					<b>146,426,055</b>	<b>154,354,538</b>

Key: The risk noted affects the fund significantly (●) or hardly/not at all (○). D = Direct risk ID = Indirect risk.

The annuity policy is subject to direct credit rate risk and direct interest rate risk.

**Trustee's annual report and financial statements  
for the year ended 30 April 2021**

**Notes to the financial statements continued**

**20. Current assets**

	2021 £	2020 £
Cash balances	<u>1,616,410</u>	<u>4,097,763</u>

**21. Current liabilities**

	2021 £	2020 £
Accrued expenses	<u>40,851</u>	<u>47,000</u>

**22. Employer-related investments**

As at 30 April 2021 there were no assets invested in Employer-related investments in the Scheme, within the meaning of Section 40(2) of the Pensions Act 1995 and the Occupational Pension Schemes (Investment) Regulations 2005 (2020: £Nil).

**23. Related-party transactions**

The Trustee, Lockton Pension Trustee Limited, is a subsidiary of Lockton UK Limited. Lockton UK Limited's UK parent company is LIH UK Topco Limited.

At 30 April 2021, 2 Directors of the Trustee were pensioner members of the Scheme (2020: 2) and 2 Directors of the Trustee were deferred members during the year (2020: 2). Benefits were paid in accordance with the Scheme Rules.

The Principal Employer bears certain costs of administration as referred to in note 8.

The Scheme is supported by two PPF guaranteed agreements, one dated 18 March 2009 provided by Lockton Companies International Limited and the other dated 20 March 2011 provided by Lockton International Holdings Limited. In addition, the Trustee also has the benefit of a promissory note that was given by Lockton Inc. to Lockton Companies LLP for the purposes of meeting obligations to the Scheme which came into place with effect from 12 May 2015.

**Notes to the financial statements continued****23. Related-party transactions continued**

As part of the Lockton International Holdings Limited ("LIHL") purchase of an Italian based broker in February 2016 LIHL borrowed additional funds in the form of a term loan (of \$41m USD) from Lockton Inc. to finance the purchase. An agreement was made in February 2016 between the Scheme, LIHL and Lockton Inc. that the LIHL Group will at all times have available \$15m USD of available headroom in its cashflows on a 12 month look forward basis.

**24. GMP equalisation**

On 26 October 2018, the High Court handed down a judgment involving the Lloyds Banking Group's defined benefit pension schemes. The judgment concluded that schemes should be amended to equalise pension benefits for men and women in relation to guaranteed minimum pension benefits. The issues determined by the judgment arise in relation to many other defined benefit pension schemes. Subsequently, on 20 November 2020 the High Court ruled that historical individual transfers would also be due a top-up payment where the original transfer payment fell short of what it would have been had the inequalities in benefits from GMP been removed. The Trustee of the Scheme is working with the Principal Employer and their respective advisers to assess the adjustments to benefits required (if any). The impact on the Scheme of any backdated benefits and related interest that might be payable is not expected to be material to the financial statements. The Trustee has therefore not included a liability in respect of these matters in these financial statements. They will be accounted for in the year they are determined

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Independent Auditor's Statement about Contributions to the Trustee of The Nelson Hurst Group  
Pension Scheme 4****Statement about contributions**

We have examined the Summary of Contributions payable under the Schedules of Contributions to The Nelson Hurst Group Pension Scheme 4 in respect of the Scheme year ended 30 April 2021 which is set out on page 48.

In our opinion contributions for the Scheme year ended 30 April 2021 as reported in the Summary of Contributions and payable under the Schedules of Contributions have in all material respects from 1 May 2020 to 9 December 2020 been paid at least in accordance with the Schedule of Contributions certified by the Scheme Actuary on 8 December 2017 and subsequently been paid at least in accordance with the Schedule of Contributions certified by the Scheme Actuary on 10 December 2020.

**Scope of work on statement about contributions**

Our examination involves obtaining evidence sufficient to give reasonable assurance that contributions reported in the Summary of Contributions have in all material respects been paid at least in accordance with the Schedules of Contributions. This includes an examination, on a test basis, of evidence relevant to the amounts of contributions payable to the scheme and the timing of those payments under the Schedules of Contributions.

**Respective responsibilities of Trustee and auditor**

As explained more fully in the statement of Trustee's responsibilities set out on page 48, the Scheme Trustee is responsible for ensuring that there is prepared, maintained and from time to time revised a schedule of contributions showing the rates and due dates of certain contributions payable towards the Scheme by or on behalf of the Employer and the active members of the Scheme. The Trustee is also responsible for keeping records in respect of contributions received in respect of active members of the Scheme and for monitoring whether contributions are made to the Scheme by the Employer in accordance with the Schedules of Contributions.

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

**Trustee's annual report and financial statements  
for the year ended 30 April 2021****Independent Auditor's Statement about Contributions to the Trustee of The Nelson Hurst Group  
Pension Scheme 4 continued****The purpose of our work and to whom we owe our responsibilities**

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

**Signature:****Dated:**

Pamela Marco  
For and on behalf of KPMG LLP, Statutory Auditor  
Chartered Accountants  
Challenge House  
Sherwood Drive  
Bletchley  
Milton Keynes  
MK3 6DP

**Trustee's annual report and financial statements  
for the year ended 30 April 2021**

**Summary of Contributions payable during the year ended 30 April 2021**

**Statement of Trustee's responsibilities in respect of contributions for the year ended 30 April 2021**

The Scheme's Trustee is responsible under pensions legislation for ensuring that there is prepared, maintained and from time to time revised a schedule of contributions showing the rates of contributions payable towards the Scheme by or on behalf of the Employers and the active members of the Scheme and the dates on or before which such contributions are to be paid. The Scheme's Trustee is also responsible for keeping records of contributions received and for procuring that contributions are made to the Scheme in accordance with the Schedule.

**Trustee's Summary of Contributions payable under the Schedules of Contributions in respect of the Scheme year ended 30 April 2021**

This Summary of Contributions has been prepared by, or on behalf of, and is the responsibility of the Trustee. It sets out the Employer contributions payable to the Scheme under the Schedules of Contributions certified by the Actuary on 8 December 2017 and 10 December 2020 in respect of the Scheme year ended 30 April 2020. The Scheme Auditor reports on contributions payable under the Schedules in the Auditor's Statement about Contributions.

During the year, the contributions payable to the Scheme were as follows:

	£
<b>Required by the Schedules of Contributions</b>	
Deficit funding contributions	<u>8,000,000</u>
Contributions required by the Schedules of Contributions (as reported on by the Scheme auditor and as reported in the financial statements)	<u><u>8,000,000</u></u>

Signed for and on behalf of the Trustee:

\_\_\_\_\_  
Trustee Director

Date: \_\_\_\_\_

\_\_\_\_\_  
Trustee Director

Date: \_\_\_\_\_



**Implementation Statement (forming part of the Trustee's report)***Implementation Statement, covering the Scheme  
Year from 1 May 2020 to 30 April 2021*

The Trustee of the Nelson Hurst Group Pension Scheme 4 (the "Scheme") is required to produce a yearly statement to set out how, and the extent to which, the Trustee has followed the voting and engagement policies in its Statement of Investment Principles ("SIP") during the Scheme Year. This is provided in Section 1 below.

The Statement is also required to include a description of the voting behaviour during the Scheme Year by, and on behalf of, the Trustee (including the most significant votes cast by the Trustee or on its behalf) and state any use of the services of a proxy voter during that year. This is provided in Section 3 below.

**1. Introduction**

No changes were made to the voting and engagement policies in the SIP during the Scheme Year.

The Trustee has, in its opinion, followed the Scheme's voting and engagement policies during the Scheme Year, by continuing to delegate to its investment managers the exercise of rights and engagement activities in relation to investments where applicable, as well as seeking to appoint and invest on an ongoing basis with managers that have strong stewardship policies and processes.

**2. Voting and engagement**

As part of its ongoing review of the Scheme's investment managers and its advice on any managers that are put forward to the Trustee for new investments, the Scheme's investment adviser, LCP, incorporates its assessment of the nature and effectiveness of managers' approaches to voting and engagement.

Both LCP and the Trustee were comfortable with the managers that the Scheme invested in over the Scheme Year (including the Pырford diversified growth fund which was fully disinvested over the Scheme Year in July 2020 for strategic de-risking reasons).

**3. Description of voting behaviour during the Scheme Year**

The Trustee's holdings in listed equities were within one pooled fund (Pырford Global Total Return Fund) and the Trustee had delegated to Pырford the exercise of voting rights. Therefore the Trustee was not able to direct how votes were exercised and the Trustee itself has not used proxy voting services over the Scheme Year. The Scheme fully disinvested from this fund partway through the reporting period (July 2020) for strategic de-risking reasons and therefore no longer holds any assets in this fund.

In this section we have sought to include voting data from Pырford in line with the Pensions and Lifetime Savings Association (PLSA) guidance.

None of the Scheme's other asset managers held any assets with voting opportunities over the periods.

**3.1 Description of the voting processes****Pырford**

*"It is Pырford's policy to consider every resolution individually and to cast a proxy on each issue; the sole criteria for reaching these voting decisions being the best interests of the client. This is part of Pырford's broader fiduciary responsibility to its clients.*

*Pырford have appointed Institutional Shareholder Services (ISS) who are a company that provide advice regarding shareholder votes, to monitor meetings data and to produce a voting schedule based upon individual client proxy voting guidelines, or Pырford's guidelines where a client does not provide their own. This schedule requires authorisation by an appropriately authorised member of the Pырford investment team before the votes are registered.*

*Pырford will only abstain on a vote where it proves impossible to obtain adequate or reliable details of the proposals to be voted on within the required time frame. Pырford believe that, having appointed ISS, this is now only likely to happen in exceptional circumstances."*

**Trustee's annual report and financial statements  
for the year ended 30 April 2021**

**Implementation Statement (forming part of the Trustee's report) continued**

**3.2 Summary of voting behaviour over the Scheme Year**

A summary of voting behaviour over the period is provided in the table below.

Manager name	Pyrford
Fund name	Pyrford Global Total Return (Sterling) Fund
Total size of fund at end of reporting period	£2.1bn
Value of Scheme assets at end of reporting period (£ / % of total assets)	£17m / 8% (as at date of disinvestment in July 2020)
Number of equity holdings at end of reporting period	60
Number of meetings eligible to vote	29
Number of resolutions eligible to vote	389
% of resolutions voted	100
Of the resolutions on which voted, % voted with management	95.6
Of the resolutions on which voted, % voted against management	4.4
Of the resolutions on which voted, % abstained from voting	0.0
Of the meetings in which the manager voted, % with at least one vote against management	48.3
Of the resolutions on which the manager voted, % voted contrary to recommendation of proxy advisor	2.6

*Note: Data in the table is provided for the year to 23 July 2020 i.e. the Scheme's disinvestment date from Pyrford's Global Total Return (Sterling) Fund*

**3.3 Most significant votes over the Scheme Year**

The criteria for which Pyrford has assessed votes to be considered "most significant" is as follows: "Pyrford believe that all proxy votes are important and aim to vote all ballots received on behalf of their clients. All proxy votes are reviewed by their ESG Forum on a quarterly basis. Those deemed to be "significant" are where Pyrford believe the outcome could have a meaningful impact on shareholder returns over the fund's five-year investment horizon. These could include management and board appointments and compensation, decisions affecting capital structure as well as company responses to social, environmental or competitive pressures."

Commentary on the most significant votes over the period provided by Pyrford is set out below.

• **GlaxoSmithKline Plc, May 2020**

Vote: Against. Outcome of the vote: Approved

Summary of resolution: Remuneration policy

Rationale: "A vote against the resolution was warranted as the incumbent US-based Executive Director's pension arrangements subsist at a level significantly higher than that of the wider workforce, and there was no disclosed plan towards alignment over time."

• **China Mobile Limited, May 2020.**

Vote: Against. Outcome of the vote: Approved

Summary of resolution: Executive Share Option Plan

Rationale: "A vote against this resolution was warranted because:

- the company could be considered a mature company, and the limit under the proposed scheme exceeds 5 percent of the company's issued capital;

**Implementation Statement (forming part of the Trustee's report) continued**

- *the company did not disclose sufficient information on the performance conditions attached to the vesting of options granted under the scheme; and*
- *the directors eligible to receive options under the scheme are involved in the administration of the scheme."*

**Trustee's annual report and financial statements  
for the year ended 30 April 2021**

**Appendix – Actuary's Certification of the Schedule of Contributions**

*Actuary's certification of schedule of  
contributions*

This certificate is provided for the purpose of Section 227(5) of the Pensions Act 2004 and Regulation 10(6) of the Occupational Pension Schemes (Scheme Funding) Regulations 2005

Name of scheme: The Nelson Hurst Group Pension Scheme 4

**Adequacy of rates of contributions**

1. I certify that, in my opinion, the rates of contributions shown in this schedule of contributions are such that:

the statutory funding objective can be expected to be met by the end of the period specified in the recovery plan dated 10 December 2020.

**Adherence to statement of funding principles**

2. I hereby certify that, in my opinion, this schedule of contributions is consistent with the Statement of Funding Principles dated 10 December 2020.

The certification of the adequacy of the rates of contributions for the purpose of securing that the statutory funding objective can be expected to be met is not a certification of their adequacy for the purpose of securing the scheme's liabilities by the purchase of annuities, if the scheme were to be wound up.

  
Signature: ..... Date: 10 December 2020

Name: Kenneth Hardman

Qualification: FIA

Address: Lane Clark & Peacock LLP  
95 Wigmore Street  
London  
W1U 1DQ

Name of employer: LCP  
(if applicable)