

DUN & BRADSTREET (UK) PENSION PLAN
ANNUAL GOVERNANCE STATEMENT FOR THE PLAN YEAR ENDING
5 APRIL 2025

**PREPARED IN ACCORDANCE WITH REGULATION 23 OF THE OCCUPATIONAL
PENSION SCHEMES (SCHEME ADMINISTRATION) REGULATIONS 1996 (THE
"REGULATIONS")**

1. INTRODUCTION

- 1.1 Governance requirements apply to defined contribution (DC) pension schemes, such as the DC Section of the Dun & Bradstreet (UK) Pension Plan ('the Plan'). The Trustee of the Plan is required to produce a yearly statement, signed by the Trustee Chair, to outline how these governance requirements have been met in relation to:
- The investment options available to members, including the default investment options,
 - The net investment returns for each of the investment options,
 - The asset allocation assessment,
 - The requirements for processing financial transactions,
 - The charges and transaction costs incurred by members, including the extent to which they provide value to members and the possible impact they have on benefits, and
 - Trustee knowledge and understanding.
- 1.2 This statement covers the Plan's year from 6 April 2024 to 5 April 2025 (although some of the information below relates to the year ending 31 March 2025, the period closest to the Plan's year end for which information is available).

2. INVESTMENT OPTIONS

The default investment options

- 2.1 At the start of the Plan year, the DC Section's three default investment options were:
- The Diversified Drawdown Lifestyle 2021 (previously called the Diversified Lifestyle Drawdown Investment Programme) – since 14 June 2021, this has been the default investment option for new members who were automatically enrolled into the DC Section,
 - The Diversified Annuity Lifestyle 2021 (previously called the Diversified Lifestyle Annuity Investment Programme) – before 14 June 2021, this was the default investment option for new members who were automatically enrolled into the DC Section, and
 - The Aviva Pension (AP) Money Market Fund – this is the default investment option that was used for the temporary investment of members' contributions following the suspension in trading of one of the investments funds in 2020.

During the Plan year, the Diversified Drawdown Lifestyle 2021 and Diversified Annuity Lifestyle 2021 were updated by replacing the Aviva Pension (AP) BlackRock (30:70) Currency Hedged Global Equity Tracker Fund with the Dun & Bradstreet (UK) Pension Plan Global Equity Passive Fund. At the same time the names of these Lifestyles were

updated with a 2024 suffix. These changes were effective for new members automatically enrolled from 1 January 2025 and for existing members from 25 March 2025.

- 2.2 The Trustee prepares and keeps under review a Statement of Investment Principles in accordance with regulation 2A of the Occupational Pension Schemes (Investment) Regulations 2005 and a copy of the latest version (dated September 2024) is attached as Appendix I to this statement and can also be found on the Plan's website (see [the D&B \(UK\) Pension Plan](#)) along with a copy of this statement. This sets out the Trustee's investment policies relating to the Plan as a whole, including such matters as the Trustee's investment beliefs and objectives, the investment management arrangements, risk controls, as well as the selection and monitoring of investment managers. In addition, the SIP sets out the Trustee's approach to sustainable investment (such as the extent to which environmental, social and governance (ESG) factors are considered) and the exercising of voting rights that arise from the Plan's investments.
- 2.3 The SIP also includes the aims and objectives for the DC Section's default investment options, together with the reasons why the Trustee feels they are appropriate for those members who do not actively make their own investment choice.
- 2.4 None of the default investment options operate with performance-based fees.
- 2.5 Further information on all of the default investment options is provided below.

The Diversified Drawdown Lifestyle 2021

- 2.6 The DC Section is used as a Qualifying Scheme for auto-enrolment. At the start of the Plan year, contributions for new members who were automatically enrolled into the DC Section and who did not make an explicit choice on how to invest their pension savings were automatically invested in the Diversified Drawdown Lifestyle 2021. This had been the DC Section's 'auto-enrolment' default investment strategy since 14 June 2021. However, as a result of the default investment strategy review undertaken during 2023/24, this Lifestyle was updated by replacing the AP BlackRock (30:70) Currency Hedged Global Equity Tracker Fund with the Dun & Bradstreet (UK) Pension Plan Global Equity Passive Fund. At the same time the Lifestyle name was updated with a 2024 suffix. These changes were effective for new members automatically enrolled from 1 January 2025 and for existing members from 25 March 2025.
- 2.7 The aims and objectives of the Diversified Drawdown Lifestyle 2024 are to:
- Provide long-term real growth whilst members are far from their selected retirement date,
 - Gradually reduce risk as members get nearer to their selected retirement date by automatically moving members savings to lower risk investment funds, and
 - Have an asset allocation at the member's selected retirement date that is appropriate and consistent with providing a flexible income in retirement by using income drawdown.

- 2.8 The next full review is scheduled for 2026. Between full reviews, as part of its quarterly meetings and based on fund performance information provided by Aviva, the Investment and Funding Committee (I&FC) reviews the performance of the Lifestyle to ensure that it is performing in line with its objectives.

The Diversified Annuity Lifestyle 2021

- 2.9 For members who were automatically enrolled into the DC Section before 14 June 2021 and who did not make an investment choice, their own and the employer's contributions

were invested in the Diversified Annuity Lifestyle 2021 (previously the Diversified Lifestyle Annuity Investment Programme). However, as a result of the default investment strategy review undertaken during 2023/24, this Lifestyle was updated by replacing the AP BlackRock (30:70) Currency Hedged Global Equity Tracker Fund with the Dun & Bradstreet (UK) Pension Plan Global Equity Passive Fund. At the same time the Lifestyle name was updated with a 2024 suffix. These changes were effective for new members automatically enrolled from 1 January 2025 and for existing members from 25 March 2025.

- 2.10 The aims and objectives of the Diversified Annuity Lifestyle 2024 are to:
- Provide long-term real growth whilst members are far from their selected retirement date,
 - Gradually reduce risk as members get nearer to their selected retirement date by automatically moving members savings to lower risk investment funds, and
 - Have an asset allocation at the member's selected retirement date that is appropriate and consistent with providing a guaranteed income by the purchase of an annuity.
- 2.11 The next full review is scheduled for 2026. Between full reviews, as part of its quarterly meetings and based on fund performance information provided by Aviva, the I&FC reviews the performance of the Lifestyle to ensure that it is performing in line with its objectives.

The AP Money Market Fund

- 2.9 Towards the end of March 2020, trading in the Aviva Pension (AP) CT Pensions Property Fund (formerly named the Threadneedle Pensions Property Fund) was temporarily suspended due to the impact of Covid-19 making it difficult to place an accurate value on the properties in which the fund invested. This meant that it was not possible for members to invest new money in or withdraw money from this fund (except in specific circumstances, such as normal retirement). Consequently, for members investing at least part of their contributions in the AP CT Pensions Property Fund, to avoid any delay in the collection and investment of those contributions, the Trustee agreed that from April 2020 these contributions should be temporarily invested in an alternative fund and chose the AP Money Market Fund for this purpose.
- 2.10 At the time of trading being suspended, affected members were informed that once the trading suspension was lifted, their contributions would once again be invested in the AP CT Pensions Property Fund. The trading suspension in the AP CT Pensions Property Fund was lifted in September 2020 and consequently the investment of contributions resumed from this date.
- 2.11 The aims and objectives of the AP Money Market Fund is to protect the value of capital by investing in deposit investments and similar assets with governments, first class banks and major companies (although while the fund aims to provide a lower risk return, values can fall). Consequently, as it was felt likely that the trading suspension in the AP CT Pensions Property Fund was likely to only be over the short term, the Trustee agreed that the AP Money Market Fund was an appropriate default option for the temporary investment of members' contributions as it minimised the risk of these contributions falling in value pending the recommencement of their investment in the AP CT Pensions Property Fund.
- 2.12 The Trustee will undertake a strategic review of the AP Money Market Fund every three years to ensure it remains appropriate as the default option for the temporary investment of members' contributions if trading in an investment fund is temporarily suspended. An earlier review will be undertaken if there are any significant changes in investment policy or membership.

- 2.13 The first review of the AP Money Market Fund was undertaken during the 2023/24 Plan Year. Following the review, the Trustee concluded that the fund remains appropriate
- 2.14 Between full reviews, as part of its quarterly meetings and based on fund performance information provided by Aviva, the I&FC reviews the performance of the AP Money Market Fund to ensure that it is performing in line with its objectives.

The alternative investment options

- 2.15 As an alternative to the three default investment options, members of the DC Section can invest in:
- Two alternative lifestyle investment strategies, the Equity Drawdown Lifestyle 2021 (previously the World Equity Lifestyle Drawdown Investment Programme) and the Equity Annuity Lifestyle 2021 (previously the World Equity Lifestyle Annuity Investment Programme), and
 - A selection of 12 investment funds (including the AP Money Market Fund) that make up the 'self-select fund range'.

The changes to the global equity fund (referred to above) also applied to the Equity Drawdown Lifestyle 2021 and the Equity Annuity Lifestyle 2021, following which the Lifestyle names were updated with a 2024 suffix.

The Old Money Purchase Section

- 2.16 Members with benefits in the Plan's Old Money Purchase Section are invested in the OMPS Lifestyle 2021 (previously the Dun & Bradstreet Lifecycle 2018) that mirrors the Diversified Annuity Lifestyle 2021. The changes to the global equity fund (referred to above) also applied to this strategy, following which the Lifestyle name was updated with a 2024 suffix.

3. NET INVESTMENT RETURNS

- 3.1 In the tables below are shown the net investment returns for each of the default investment strategies and the alternative investment options that members are (or were) able to select and in which members were invested during the year to 5 April 2025. As the fund changes explained above only came into effect from 25 March 2025, for existing members, the net investment returns do not take these changes into account. Net investment returns are the performance of each of the investment options and funds less all member borne charges and transaction costs. The information has been provided by Aviva (see also the notes on page 56).
- 3.2 When preparing this information, the Trustee has considered the guidance issued by the Department for Work and Pensions (DWP) titled 'Completing the annual Value for Members assessment and Reporting of Net Investment Returns' dated October 2021.

The default investment options

- 3.3 For the Diversified Drawdown Lifestyle 2021 and the Diversified Annuity Lifestyle 2021, because the net investment returns are different for members of different ages, the tables below show the annual net investments returns for members aged 25, 45 and 55 at the start of the five-year period.

The Diversified Drawdown Lifestyle 2021

Age of member	Net investment return 5 years to 31 March 2025	Net investment return 1 year to 31 March 2025
25	14.0% pa	8.0%

45	10.5% pa	7.0%
55	6.3% pa	5.0%

The Diversified Annuity Lifestyle 2021

Age of member	Net investment return 5 years to 31 March 2025	Net investment return 1 year to 31 March 2025
25	14.0% pa	8.0%
45	6.3% pa	5.0%
55	3.8% pa	4.5%

The AP Money Market Fund

Fund name	Net investment return 5 years to 31 March 2025	Net investment return 1 year to 31 March 2025
AP Money Market	2.2% pa	4.4%

The alternative investment options

- 3.4 As an alternative to the default investment options, members of the DC Section can choose from two alternative lifestyle strategies, the Equity Drawdown Lifestyle 2021 and the Equity Annuity Lifestyle 2021, or from individual investment funds included in the self-select fund range.
- 3.5 For the Equity Drawdown Lifestyle 2021 and the Equity Annuity Lifestyle 2021, because members invested in these two lifestyles are invested in the Aviva Pension (AP) BlackRock (30:70) Currency Hedged Global Equity Index Tracker fund until they are five years from their selected retirement age, the net investment returns are the same for members aged 25, 45 and 55 at the start of the five-year period. The net investment returns for these two lifestyles are shown in the table below.

The Equity Drawdown Lifestyle 2021 & the Equity Annuity Lifestyle 2021

Age of member	Net investment return 5 years to 31 March 2025	Net investment return 1 year to 31 March 2025
25	14.0% pa	8.0%
45	14.0% pa	8.0%
55	14.0% pa	8.0%

- 3.6 The net investment returns for the investment funds that make up the self-select fund range are shown in the table below.

Fund name	Net investment return 5 years to 31 March 2025	Net investment return 1 year to 31 March 2025
Equity funds		
AP BlackRock (30:70) Currency Hedged Global Equity Index Tracker	14.0% pa	8.0%
D&B Global Equity Active	10.7% pa	1.7%

Fund name	Net investment return 5 years to 31 March 2025	Net investment return 1 year to 31 March 2025
AP Artemis UK Special Situations	13.7% pa	7.7%
AP BlackRock UK Equity Index Tracker	11.5% pa	8.7%
AP BlackRock World ex-UK Equity Index Tracker	14.9% pa	3.4%
Fixed Interest funds		
AP L&G All Stocks Gilt Index	-6.2% pa	-0.3%
AP BlackRock Over 15 Year Gilt Index Tracker	-12.7% pa	-7.5%
AP BlackRock 5 Year Index Linked Gilt Index Tracker	-9.7% pa	-9.3%
AP BlackRock Over 15 Year Corporate Bond Index Tracker	-5.6% pa	-5.8%
Alternative funds		
AP CT Pensions Property	3.1% pa	6.0%
AP L&G Diversified	6.3% pa	5.0%
AP Money Market	2.2% pa	4.4%

The Old Money Purchase Section

- 3.7 For the OMPS Lifestyle 2021, because the net investment returns are different for members of different ages, the table below shows the annual net investments returns for members aged 25, 45 and 55 at the start of the five-year period.

Age of member	Net investment return 5 years to 31 March 2025	Net investment return 1 year to 31 March 2025
25	14.0% pa	8.0%
45	6.3% pa	5.0%
55	3.8% pa	4.5%

Notes to net investment returns

- Figures calculated by Aviva in line with the requirements of the Occupational Pension Schemes (Administration, Investment, Charges and Governance) (Amendment) Regulations 2021 and accompany statutory guidance.
- The net investment returns for the Diversified Drawdown Lifestyle 2021 and the Diversified Annuity Lifestyle 2021 assume a retirement age of 65.
- The returns are net of all charges and costs borne by members, including platform or product administration charges, fund management charges, additional fund expenses and transaction costs.
- The net investment returns reflect the charges and costs at the time of calculation, which could vary in the future.

4. **ASSET ALLOCATION ASSESSMENT**

- 4.1 The Trustee is required to assess and report on the allocation of assets in each default arrangement and the results are included in Appendix II.

5. **CORE FINANCIAL TRANSACTIONS**

- 5.1 The completion of all core financial transactions is subject to Aviva's agreed service levels that are set out in the Service Level Agreement (SLA) with the Trustee. Amongst other services, the SLA covers the timeliness and accuracy of tasks, such as the collection and investment of the monthly contributions, investment fund switches and benefit payments for retirements, leavers and deaths.

- 5.2 The Trustee's Governance Committee (GC) monitors Aviva's performance against its agreed service levels at each of its quarterly meetings (held in May, September, November and February during the year covered by this statement), which are attended by Aviva. At each GC meeting, Aviva presents its quarterly governance report and provides an overview of its performance against its agreed service levels (which are broken down by task and transaction type) and explains the reasons for any instances of underperformance, including the steps being taken to address the underperformance. Attendance by Aviva also allows the GC to ask for further information on tasks that are significantly beyond the target set out in the SLA.

- 5.3 During the year to 5 April 2025:

- For core financial transactions completed using 'straight through processing' (the payment and investment of monthly contributions), 100% were completed within the targets set out in the SLA,
- For core financial transactions not completed using 'straight through processing', the proportion completed within the targets set out in the SLA was 99% for the year (ranging from 96% to 100% each quarter), and
- For all administration tasks, the proportion completed within the targets set out in the SLA was 98% for the year (ranging from 97% to 100% each quarter).

- 5.4 The Plan's auditors also review core financial transactions as part of the annual audit.

- 5.5 Based on the monitoring by the GC at its quarterly meetings, the Trustee is satisfied that during the Plan year ending 5 April 2025:

- Aviva operated appropriate procedures, checks and controls in relation to its agreed service levels,
- There were no material administration errors in relation to the processing of core financial transactions, and
- Overall, core financial transactions were completed promptly and accurately.

6. **CHARGES, TRANSACTION COSTS, AND VALUE FOR MEMBERS**

Charges and transaction costs

- 6.1 The explicit fund charges for each investment fund, known as the Total Expense Ratio (TER), applicable to the Plan's investment options are shown in Appendix III to this statement (provided by Aviva). The TERs cover the costs of the administration, communication and investment services that Aviva provides to members of the DC Section as well as some governance support provided to the Trustee, such as the provision of quarterly governance reports.

- 6.2 In addition to these explicit fund charges, transaction costs are incurred by fund managers as a result of buying, selling, lending or borrowing the underlying investments of each fund. Details of the total transaction costs incurred by each fund for the year ending 31 March 2025 (the period closest to the Plan's year end for which information is available) are also provided in Appendix III.
- 6.3 There is no standard way of calculating transaction costs. The FCA has stipulated that a calculation methodology called 'slippage cost' should be used, which calculates the difference between the expected price of buying an underlying investment in an investment fund (for example, shares in a company) at the time the order is placed by the investment manager and the price at which the trade is executed. One consequence of this method is that, rather than generating a cost, it can result in a negative transaction cost being reported by the investment manager. In line with guidance from the DWP, where a negative transaction cost has been reported for one of the investment funds included in the DC Section (because an overall gain was made on the transactions, which can happen as a result of changes in the pricing of the assets being bought or sold), a zero transaction cost has been shown in the tables in Appendix III. However, where this has happened for the year covered by this statement, it is not expected that transaction costs will always be negative, and it is important to note that negative (or zero) transaction costs during any one year may not accurately represent the actual transaction costs a member may expect to see in future years.
- 6.4 In addition, Appendix IV includes illustrations produced by Aviva that provide an indication of how charges and transaction costs impact a member's benefits. The Trustee confirms that it believes that Aviva has taken account of the relevant statutory guidance when preparing these illustrations.

Value for members

- 6.5 The Trustee is required to assess the extent to which the charges and transaction costs incurred by members represent good value for members. There is no legal definition of 'good value' but the Trustee considers it to broadly mean that the combination of costs, and the quality of what is provided in return for those costs, is appropriate for the DC Section's membership, when compared to other options available in the market.
- 6.6 The Trustee recognises that good value for members does not necessarily mean the lowest charges, and the overall quality of the service received in return for the charges incurred by members must also be considered along with other benefits from their membership for which they do not meet the cost. These include the Trustee's:
- Oversight and governance duties for both the DC Section and the Plan as a whole, which include ensuring compliance with relevant legislation, such as the charge cap, and holding regular meetings to monitor the Plan and address any material issues that may impact members,
 - Review of the default investment options (undertaken at least once every three years) and alternative investment options to ensure they remain appropriate for the membership,
 - Monitoring of the quality of communications delivered to members, including the most appropriate and efficient method of delivery e.g. sending communications by email whenever possible, and
 - Review of the quality of the support services provided such as the Plan's website where members can access information online.

- 6.7 The Trustee assesses the extent to which the DC Section represents value for members by:
- Comparing the charges and transaction costs with other pension schemes and investment sectors, particularly in relation to the default option, the Diversified Drawdown Lifestyle 2021,
 - Assessing the performance of the investment funds against each fund's benchmark over one, three and five year periods.
 - Assessing the Plan against key features that are found within leading DC plans across the market and the value the Plan provides in the areas of retirement support, scheme governance, investment governance, administration, risk management, communications and engagement.
- 6.8 As part of this and with the assistance of its advisers, the Trustee regularly monitors the competitiveness of the charges incurred by members. In addition:
- The performance of the investment funds is compared to each fund's investment objective, as well as their continuing suitability, is monitored each quarter by the I&FC,
 - The administration performance of Aviva is closely monitored by the GC during their quarterly meetings, and
 - Transaction costs should provide value for members as the ability for investments managers to buy and sell investments (which gives rise to the transaction costs) forms an integral part of their management of the investments funds in which members are invested, which in turn should lead to greater investment returns, net of fees, over time.
- 6.9 In addition, the Trustee has previously surveyed members to obtain their views on a variety of aspects of the DC Section, such as the investment options available.
- 6.10 Having undertaken its value for member assessment and giving more weight to the DC Section's default option (in which most members are invested) in relation to charges and costs and investment performance, a summary of the Trustee's conclusions is set out below.
- Charges and transaction costs – as the charges represent most of the costs incurred by members, and the charges for the investment funds used in the default option are below the average of the charges of default options used by other DC pension schemes, the Trustee concluded that the charges provided 'good value'. Whilst the transaction costs were assessed to be largely in line or lower than the market average, these were not considered in providing an overall value rating as they make up a relatively small proportion of the overall costs.
 - Investment performance – the performance of the funds used in the default option was in the upper range in the growth phase over the one, three and five year periods to 31 March 2025.
 - Giving greater weight to where most assets are invested and considering the performance of the self-select funds, overall, the Trustee concluded that investment performance provided 'good value'.
 - Services – the Trustee has a Service Level Agreement (SLA) in place with Aviva and Aviva's performance against its targets set out in the SLA was good during the year and showed an improvement over the previous year. In addition, the Trustee operates an effective governance framework and continues to support members with a variety of good quality communications, including a dedicated website for the Plan (see [the](#)

[D&B \(UK\) Pension Plan](#)). Overall, the Trustee therefore concluded that the services provided by the Plan represented 'good value'.

- 6.11 Based on the above, for the year ending 5 April 2025, the Trustee concluded that overall, the DC Section provided 'good value' to the members.

6. TRUSTEE KNOWLEDGE AND UNDERSTANDING (TKU)

- 6.1 The requirement under section 248 of the Pensions Act 2004 (requirement for knowledge and understanding) has been met during the Plan year by the Trustee Directors undertaking regular training at each quarterly board meeting and targeted attendance at external training courses. In addition, the I&FC receive from the Trustee's investment advisers regular training on investment topics as part of their I&FC meetings.

- 6.2 The Trustee has measures in place to ensure each of the Trustee Directors meet the TKU requirements. These are summarised below:

- There is an agreed induction process for new Trustee Directors (and there was one new appointment during the year covered by this statement).
- All Trustee Directors are required to complete all sections of the Pensions Regulator's trustee toolkit (all the Trustee Directors as at the reporting date have successfully completed the toolkit).
- Four out of the eight Trustee Directors hold the Pensions Management Institute's 'Award in Pension Trusteeship (Defined Contribution and Defined Benefit Schemes)'.
- Training needs are identified by self-assessment undertaken by individual Trustee Directors or collectively by the Trustee board to identify a specific need for the group (the Trustee Directors last undertook an updated self-assessment of their training needs during the Plan year. They will carry out the next self-assessment in the year ending 5 April 2026 to identify topics for future training sessions).
- The Trustee's advisers bring to the Trustee's attention any changes in legislation or governance requirement that are relevant to the DC Section of the Plan.
- The Trustee has a dedicated budget to meet the costs associated with the provision of the required training. During the year ending 5 April 2025, examples of the training received relevant to the DC Section are as follows:
 - Balance of Powers,
 - Whistleblowing.
 - LDI training

In addition to the above, in relation to the wider Plan, the Trustee received indirect training via various topical updates provided at meetings during the period as well as quarterly updates on the current issues in pensions.

- Plan documents are available to the Trustee Directors on a dedicated Trustee site that allows them to refer to them as necessary and thereby maintain a working knowledge of the Plan's key documents, including the Trust Deed and Rules, the Statement of Investment Principles and the Trustee's current policies, which is supplemented by relevant training and advice as required.

- All training undertaken by the Trustee Directors, whether individually or collectively as a group, is recorded in a training log.

The Plan benefits from a very stable and experienced Trustee board. This, combined with the knowledge and understanding of the Trustee Directors and the advice received by them from their professional advisers (both as part of their attendance at quarterly Trustee and I&FC meetings and on an ongoing basis throughout the year), enables them to properly exercise their functions as Trustee Directors by formulating a suitable investment framework and providing rigorous governance for the Plan.

Signed for and on behalf of Dun & Bradstreet (UK) Pension Plan



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Andy Jermy, Chair of Trustee

09/10/25

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Date