Statement of Investment Principles
Dun & Bradstreet (UK) Pension Plan

September 2024

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Introduction

1 This document is the Statement of Investment Principles ('the Statement') made by the Trustee of the Dun & Bradstreet (UK) Pension Plan (the 'Plan') in accordance with the requirements of Section 35 of the Pensions Act 1995 (as amended by the Pensions Act 2004 and regulations made under it).

2 The Trustee will review this Statement at least every three years and without delay after any significant change in investment policy. Before finalising this Statement, the Trustee took written advice from the Plan's Investment Consultant (Towers Watson Limited) and consulted the Principal Employer. The Investment Consultant's written advice will consider the issues set out in the Pensions Act, the Occupational Pension Schemes (Investment) Regulations 2005 and the principles contained in this Statement.

3 When choosing investments, the Trustee and the investment managers (to the extent delegated) are required to have regard to the criteria for investment (including diversification and suitability of investments) set out in the Occupational Pension Schemes (Investment) Regulations 2005 and the principles contained in this statement. Additionally the Trustee will obtain advice on whether its existing investments remain satisfactory on a regular basis.

4 The ultimate power and responsibility for deciding investment policy lies solely with the Trustee.

Investment managers

5 In accordance with the Financial Services and Markets Act 2000, the Trustee will set general investment policy, but will delegate the responsibility for selection of specific investments to an appointed investment manager or managers. The investment managers shall provide the skill and expertise necessary to manage the investments of the Plan competently.

6 The Plan may use different investment managers and mandates to implement its investment policies. The Trustee will ensure that, in aggregate, its portfolio is consistent with the policies set out in this Statement, in particular those required under regulation 2(3)(b) of the Occupational Pension Schemes (Investment) Regulations (2005). The Trustee will also review the investment objectives and guidelines of any particular pooled vehicle for consistency with its policies, where relevant to the mandate in question. Where segregated mandates are used, the Trustee will use its discretion, where appropriate, to set explicit guidelines within the Investment Management Agreement to ensure consistency with the Trustee's policies, where relevant to the mandate.

7 To maintain alignment, investment managers will be provided with the most recent version of the Plan's Statement of Investment Principles on an annual basis and are asked to confirm if the management of the assets is consistent with those policies relevant to the mandate in question. Should the Trustee's monitoring process reveal that a manager's objectives and guidelines do not appear to be sufficiently aligned with the Trustee's policies, the Trustee will engage with the manager further to encourage alignment. If this is not possible, the Trustee

may consider alternative options available in order to terminate and replace the investment manager.

8 For most of the Plan's investments, the Trustee expects the investment managers to invest with a medium to long time horizon, and to use their engagement activity where applicable to drive improved performance over these periods. The Trustee may invest in certain strategies (e.g. hedge fund strategies) where such engagement is not deemed appropriate, due to the nature of the strategy and/or the investment time horizon underlying decision making. The appropriateness of the Plan's allocation to such mandates is determined in the context of the Plan's overall objectives.

9 The Trustee appoints its investment managers with an expectation of a long-term partnership, which encourages active ownership of the Plan's assets. When assessing an investment manager's performance, the focus is on longer-term outcomes, and the Trustee would not expect to terminate a investment manager based purely on short term performance. However, an investment manager's appointment could be terminated within a shorter timeframe due to other factors such as a significant change in business structure or the investment team.

10 The Trustee will maintain processes to ensure that performance is assessed on a regular basis against a measurable objective for each investment manager, consistent with the achievement of the Plan's long-term objectives, and an acceptable level of risk. In order to do this, the Trustee will monitor both the performance of the Plan's asset classes and its investment managers quarterly. In addition, the Trustee will meet with the Plan's investment managers periodically and review the Investment Consultant's views on the investment managers. These views are typically summarised by the Plan's Investment Consultant in a rating system, along with other summary documents.

11 Managers are paid an ad valorem fee, in line with normal market practice, for a given scope of services which includes consideration of long-term factors and engagement. In addition, where appropriate, performance fees may be utilised to incentivise managers.

12 The Trustee will monitor the level of transaction costs (including commissions) across the Plan incurred by each investment manager through regular engagement with the manager on this subject and through receipt of MiFID II compliant cost reporting. There is no broad targeted portfolio turnover (how frequently assets within a fund are bought and sold by investment managers) which the Trustee adheres to. The Trustee will monitor that the level of portfolio turnover remains appropriate in the context of the investment managers' strategy and the Plan's investment strategy.

A. Defined benefit section

Plan objectives

13 To guide it in its strategic asset management, the Trustee (in consultation with the Principal Employer) has considered its key investment objectives. The primary objective is that the Plan's assets are held to meet the Plan's liabilities as and when they fall due. At the time of the last review of long-term investment strategy, the Trustee's policy in this regard was summarised as follows:

(i) To invest in a range of suitable assets of appropriate liquidity which will generate, in the most effective manner possible, income and capital growth to ensure that, with any new contributions from members and the Principal Employer, there are sufficient assets to meet the cost of the current and future benefits which the Plan provides as part of its Defined Benefit sections.

(ii) To minimise the long-term costs to the Principal Employer by maximising the return on the assets, whilst having regard to the risk objectives described above.

(iii) To minimize exposure to excessive short-term volatility of investment returns.

Investment strategy

14 In setting the long-term asset allocation to achieve its stated objective, the Trustee has, with the help of its Scheme Actuary and Investment Consultant, evaluated the degree of risk associated with various asset allocation strategies taking account of the Plan's liability profile.

15 The investment strategy makes use of three key types of investments:

(i) using a range of instruments that provide a reasonable match to changes in liability values, which may include gilts, corporate bonds, derivatives and annuities

(ii) a diversified range of return-seeking assets, including (but not limited to) a number of diversified growth funds

(iii) actively and passively managed portfolios.

16 The balance within and between these investments will be determined from time to time with regard to maximising the chance of achieving the Plan's investment objectives.

17 The Trustee will monitor the liability profile and funding level of the Plan and will regularly review, in conjunction with the Investment Consultant and the Scheme Actuary, the appropriateness of its investment strategy. The Trustee has adopted a journey plan whereby the Plan has set an objective to reach a 100% funding level on a gilt flat funding basis, excluding the buy-in assets and liabilities but including any deficit arising from the Old Money Purchase Scheme (OMPS) liabilities. This is being implemented via an investment strategy which reduces investment risk over time but is expected to reach this goal by 2030. This objective is measured using an alert tool designed to automatically track the Plan's assets and liabilities on a daily basis, enabling dynamic management of the investments by the Trustee in conjunction with its advisors.

18 The expected return of investments will be monitored regularly and will be directly related to the Plan's investment objective. When setting investment strategy the Trustee will take advice from its advisors, including regular Asset Liability Modelling undertaken by the Plan's Investment Consultant, and will consult with the Principal Employer. Specifically, this Asset Liability Modelling will consider the expected return required to reach the Plan's end goal and the level of expected risk being taken.

19 The Trustee's policy is that there will be sufficient investments in liquid or readily realisable assets to meet cashflow requirements in foreseeable circumstances so that the realisation of assets will not disrupt the Plan's overall investments, where possible. The Trustee, together with the Plan's administrators, will hold sufficient cash to meet benefit and other payment obligations. The Trustee does not borrow money and does not permit the investment managers to borrow money for the purpose of providing liquidity.

Sustainable investment

20 ESG factors and stewardship policies have an impact on the Plan's financial and non-financial outcomes. These are considered amongst other risk factors when making investment decisions.

21 The Trustee's view is that relevant ESG factors and stewardship policies should be included amongst the criteria taken into account when considering decisions relating to investment strategy, selection of investment managers and the purchase, retention or sale of the underlying investments. The Trustee expects there to be a positive impact on the Plan's financial and non-financial outcomes when ESG factors and stewardship policies are considered in decisions relating to investment strategy.

22 The Trustee's policy is to delegate the extent to which ESG factors and stewardship policies (including voting rights) are taken into account in the purchase, retention or sale of underlying investments to the investment managers. This includes consideration of all financially materially factors and other relevant matters including capital structure of investee companies, actual and potential conflicts, other stakeholders and ESG impact of underlying holdings. The Trustee will review the investment managers ESG and stewardship policies regularly to ensure that the investment managers are carrying out their delegated responsibilities. The Trustee has agreed the following priority areas when considering the stewardship activities undertaken by the investment managers on behalf of the Trustee:

- Diversity, remuneration and workforce interests
- Environmental and social issues, including climate change

Statement of Funding Principles

23 A Plan specific Statement of Funding Principles ('SFP') has been prepared by the Trustee and the Principal Employer after taking advice from the Scheme Actuary, and will be updated after each actuarial valuation. The Trustee considers that this Statement of Investment Principles is consistent with the SFP.

Other matters

24 The Plan is a Registered Pension Scheme for the purposes of the Finance Act 2004.

25 The Trustee recognises a number of risks involved in the investment of the Plan's assets:

Deficit risk:

- is measured through a qualitative and quantitative assessment of the expected development of the liabilities relative to the current and alternative investment policies
- is managed through assessing the progress of the actual development of the Plan's funding level and ongoing consideration of the Plan's asset allocation.

Liquidity risk:

- is measured by the level of cashflow required by the Plan over a specified period
- is managed by the Plan's administrators assessing the level of cash held in order to limit the impact of cash flow requirements on the investment policy and through holding assets of appropriate liquidity.

Currency risk:

- is measured by the level of exposure to non-Sterling denominated assets
- is managed by reducing the translation risk of investing overseas, by hedging a proportion of the overseas investments' currency translation risk, for those overseas currencies that can be hedged efficiently.

Interest rate and inflation risk:

- is measured by comparing the likely movement in the Plan's liabilities and assets due to movements in inflation and interest rates
- is managed by holding a portfolio of matching assets that enable the Plan's assets to better-match movements in the value of the liabilities due to inflation and interest rates.

Political risk:

- is measured by the level of concentration of any one market leading to the risk of an adverse influence on investment values arising from political intervention
- is managed by regular reviews of the actual investments relative to policy and through the level of diversification within the existing policy.

Sponsor risk:

- is measured by receiving regular financial updates from the Principal Employer and periodic covenant assessments
- is managed through an agreed contribution and funding schedule.

Manager risk:

- is measured by the expected deviation of the return relative to the benchmark set
- is managed by limiting exposure to any one investment manager, consideration of the appropriate amount of the Plan to allocate to each active portfolio and by monitoring the actual deviation of returns relative to the benchmark and factors supporting the managers' investment process.

Derivatives risk

- Counterparty and operational risk – this risk is mitigated through collateral management, diversifying exposure across counterparties, and the use of robust ISDA, GMRA or other relevant derivatives documentation and appropriate advice. This is managed by the Plan's hedging manager.
- Liability risk – pension liabilities can only be estimated and there is a risk of divergence between the performance of the derivatives and the actual value of the liabilities (for example, due to changes in assumptions or demographics). This risk is mitigated by updating the liability hedging benchmark at appropriate regular intervals.

Buy-in insurer risk

- This is the risk that the buy-in insurer(s) fail to pay the benefits secured under the buy-in contract. This is addressed by having selected a regulated insurer, reliance on the insurance regulatory regime and with appropriate termination rights which have been agreed with the insurers and written into the contracts.

B. Defined contribution (DC) section

DC section objectives

26 The primary investment objective of the DC section is to offer members a range of investment options that accommodate different investment objectives and attitudes to investment risk. The Trustee also feels that it is important to offer a choice of 'lifestyle' options whereby, as a member approaches retirement, their investments are automatically switched from higher risk/higher potential return investments to lower risk investments that are aligned with how they intend to take their retirement benefits. The Trustee operates four lifestyle options, two offering a choice between a diversified or passively managed global equity investment strategy during the growth phase, which then de-risk to an investment split appropriate for a member planning to take a flexible income during retirement via pension income drawdown and two offering the same choice during the growth phase, which then de-risk to an investment split appropriate for a member planning to purchase an annuity on retirement.

27 The Trustee monitors the ongoing suitability and performance of all the lifestyle options and investment fund range in line with the Pensions Regulator's General Code of Practice (March 2024.

Default arrangements

28 The Diversified Drawdown Lifestyle 2021 (DDL) is the nominated default investment option for members who are auto-enrolled in to the Plan. The aims and objectives of the DDL are to provide members with a medium to high risk investment strategy that potentially offers good levels of growth whilst they are more than 10 years from retirement but then de-risks to a mix of lower risk investments appropriate for a member who, on retirement, intends to take part of

their retirement savings as a tax-free lump sum and use the balance to provide a flexible income over the long term via pension income drawdown.

In order to meet the aims and objectives of the DDL, the adopted investment strategy is as follows:

- To provide members with higher levels of growth when they are more than 25 years from retirement, the DDL invests entirely in passively managed global equities, split 30% in the UK and 70% overseas. During this period, annual long term growth is expected to be in line with a benchmark of 30% FTSE All Share Index, 60% FTSE All-World Developed (ex-UK) Index and 10% MSCI Emerging Markets Index.
- To provide members with good levels of growth during the middle years of their membership but with lower volatility (risk) compared to wholly investing in global equities by gradually switching into a more diversified range of investments whilst a member is between 25 and 10 years from retirement. During this period, annual long term growth is expected to be in line with the relevant combination of each individual fund's benchmark / performance objective, namely the 30% FTSE All Share Index, 60% FTSE All-World Developed (ex-UK) Index and 10% MSCI Emerging Markets Index and 3.5% above the Sterling Overnight Index Average (SONIA).
- To consolidate a member's investments by gradually switching to a lower risk mix of diversified and cash investments. During this period, annual long term growth is expected to be in line with the relevant combination of each individual fund's benchmark / performance objective, namely 3.5% above SONIA and SONIA.

29 The Diversified Lifestyle Annuity Investment Programme (DLA) is a deemed default investment option. This was the nominated default investment option for new members who were auto-enrolled in to the Plan before 14 June 2021. The aims and objectives of the DLA are to provide members with a medium to high risk investment strategy that potentially offers good levels of growth whilst they are more than 10 years from retirement but then de-risks to a mix of lower risk investments appropriate for a member who, on retirement, intends to take part of their retirement savings as a tax-free lump sum and use the balance to purchase an annuity.

In order to meet the aims and objectives of the DLA, the adopted investment strategy is as follows:

- To provide members with higher levels of growth when they are more than 25 years from retirement, the DLA invests entirely in passively managed global equities, split 30% in the UK and 70% overseas. During this period, annual long term growth is expected to be in line with a benchmark of 30% FTSE All Share Index, 60% FTSE All-World Developed (ex-UK) Index and 10% MSCI Emerging Markets Index.
- To provide members with good levels of growth during the middle years of their membership but with lower volatility (risk) compared to wholly investing in global equities by investing in a more diversified range of investments whilst a member is between 25 and 10 years from retirement. During this period, annual long term growth is expected to be 3.5% above SONIA).
- To consolidate a member's investments and provide some protection against fluctuations in annuity rates during the 10 years immediately before their retirement by switching to a lower risk mix of diversified, UK Government bonds (both fixed interest and index-linked) and cash investments. During this period, annual long term growth is expected to be in line with the relevant combination of each individual fund's benchmark / performance objective, namely the FTSE UK Index-Linked Gilts Over 5

Years index, the FTSE UK Gilts All Stocks Index, 3.5% above SONIA and in line with SONIA.

30 The AP Money Market Fund is a deemed default investment option. This was used for the temporary investment of members' contributions following the temporary suspension in trading of the AP CT Pensions Property Fund in 2020. 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). Annual long-term growth is expected to be in line with SONIA. The Trustee agreed that this 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 Pension Property Fund.

31 In order to ensure compliance with the restriction on charges applicable to default investment options, the Trustee predominately use passively managed investment funds for the default arrangements.

32 For the default arrangements, to the extent that they are relevant, the Trustee's policy on investment risks, illiquid assets, social, environmental or ethical considerations and voting rights are the same as those set out under paragraphs 33, 34, 35 and 37 below.

33 The default arrangements invest in pooled investment funds to ensure that in foreseeable circumstances the Trustee can realise a member's retirement account in order to provide benefits on retirement or earlier withdrawal from the Plan.

34 The Trustee believes that the above aims and objectives of the default arrangements together with the associated investment policies are in the best interests of those members who do not select an alternative investment option. This is because in combination they provide the relevant members with an investment strategy that:

- provides good prospects for growth without undue costs thereby trying to ensure that members achieve a good level of pension savings at retirement
- manages the risks faced by the members throughout their membership
- targets a secure level of income in retirement.

35 The Trustee believes that allocating a proportion of the default arrangements to illiquid assets is likely to improve diversification and offer the potential for higher risk adjusted returns. The default arrangements do not currently include a specific allocation to illiquid assets although there may be a small allocation within the LGIM Diversified Fund at the discretion of the investment manager. The Trustee is currently investigating with the platform provider whether there are options to include illiquid assets. Any decision to include a specific allocation will be considered relative to the size of the investment, the proximity of members to retirement age and the timetable available for investing into illiquid assets.

36 The Trustee reviews the default arrangements, including their performance, at least every three years or earlier following a significant change in investment policy or the demographic profile of the members invested in the options.

Overall investment strategy

37 The retirement benefits to be provided for each member of the DC section of the Plan are directly linked to the accumulated value at retirement of the contributions paid by them and the Principal Employer on their behalf. The level of pension benefits for a given level of total contributions will principally depend on three factors:

(i) The return on the contributions invested over the period to date of retirement, and

(ii) The level of income withdrawn if a flexible pension is taken through pension income drawdown, or

(iii) The level of annuity prices at retirement if a fixed pension is purchased.

Members are also able to take the whole of their retirement savings as a lump sum (part tax-free).

38 Members can choose from a number of investment options for the investment of ongoing contributions.

39 The Trustee offers passively and actively managed investment funds. Use of passive management minimises the risk of underperformance attributable to manager skill in asset selection. The Trustee has decided to make available actively managed funds across a range of asset classes.

Sustainable investment

40 The Trustee's view is that relevant ESG factors and stewardship policies should be included amongst the criteria taken into account when selecting investment funds for inclusion in the default arrangements, the alternative lifestyle strategies and the self-select fund range.

41 The Trustee’s policy is to delegate the extent to which ESG factors and stewardship policies (including voting rights) are taken into account to the platform provider (in relation to the monitoring of the funds and fund managers available on its platform) and to the investment managers (in relation to the purchase, retention or sale of underlying investments). This includes consideration of all financially materially factors and other relevant matters including capital structure of investee companies, actual and potential conflicts, other stakeholders and ESG impact of underlying holdings. The Trustee will review the platform provider’s and the investment managers’ ESG and stewardship policies regularly to ensure that they are carrying out their delegated responsibilities. The Trustee has agreed the following priority areas when considering the stewardship activities undertaken by the investment managers on behalf of the Trustee:

- Diversity, remuneration and workforce interests
- Environmental and social issues, including climate change

42 The Trustee’s policy at this time is not to take into account non financial matters.

Investment risk

43 Under the DC section, it is the members, rather than the Principal Employer, who bear the investment risk. Members should therefore be particularly interested in the investment risk/volatility profiles of the lifestyle options and investment funds available.

44 The Trustee recognises a number of additional risks involved in the investment of assets of the DC section, including:

Inflation risk:

- is the risk that the real value of contributions made will erode over time and help lead to an inadequate amount of benefit at retirement. This could be by failing to achieve an adequate amount of return in excess of price inflation commensurate with the term of investment

- is managed by the provision of equity and index-linked gilt funds.

Pension conversion risk:

- is the risk that the value of a member's account when approaching retirement does not reflect the change in the cost of purchasing an annuity at retirement

- is managed by the provision of long index-linked gilt, fixed interest gilt and corporate bond funds as well as two lifestyle strategies that target annuity purchase at retirement.

Capital risk:

- the risk that the value of a member’s account may fall in value over any period of time but particularly in the immediate period before retirement

- is managed by the provision of a cash fund.

Currency risk:

- the risk arising from the added volatility of members investments, due to the currency translation risk assumed from holding non-Sterling assets

- is managed through providing members with a blend of options that invest in Sterling and non-Sterling assets, including a currency hedged global equity fund.

Political risk:

- is measured by the level of concentration of any one market leading to the risk of an adverse influence on investment values arising from political intervention

- is managed by regular reviews of the actual investments relative to policy and through the level of diversification within the existing policy.

Manager risk:

- is measured by the expected deviation of the return relative to the benchmark set

- is managed by limiting exposure to any one investment manager, through offering passively managed investment funds, consideration of the appropriate number of actively managed investment funds to offer and by monitoring the actual deviation of returns relative to the benchmark and factors supporting the managers' investment process.

C. Old Money Purchase Section ("OMPS")

OMPS objectives

45 The primary investment objective of the OMPS is to provide members with an accumulated value of contributions at retirement that is at least sufficient to provide the contracting-out underpin (see paragraph 34). This is achieved by investing members' retirement savings under the OMPS in a 'lifestyle' strategy whereby members' investments are automatically switched from higher risk/higher potential return investments to lower risk (or more appropriate) investments as they approach retirement.

46 Where appropriate, the Trustee monitors the ongoing suitability and performance of the lifestyle option in line with the Pensions Regulator's General Code (March 2024).

Investment strategy

47 The retirement benefits to be provided for each member of the OMPS are directly linked to the accumulated value of the contributions that were paid by them and the Principal Employer on their behalf but are subject to a minimum benefit equal to the amount of contracting-out benefit accrued by a member during their membership of the OMPS (the 'contracting-out underpin'). Subject to the contracting-out underpin, the level of pension benefits for a given level of total contributions will principally depend on two factors:

- The return on the contributions invested over the period to date of retirement.
- The level of annuity prices at retirement when the pension is purchased.

48 Members do not have a choice in relation to the investment of their retirement savings under the OMPS.

49 The Trustee has selected a passively managed lifestyle strategy for the investment of members' funds under the OMPS.

Sustainable investment

50 The Trustee's view is that relevant ESG factors and stewardship policies should be included amongst the criteria taken into account when selecting investment funds for inclusion in the lifestyle strategy.

51 The Trustee's policy is to delegate the extent to which ESG factors and stewardship policies (including voting rights) are taken into account to the platform provider (in relation to the monitoring of the funds and fund managers available on its platform) and to the investment managers (in relation to the purchase, retention or sale of underlying investments). This includes consideration of all financially materially factors and other relevant matters including capital structure of investee companies, actual and potential conflicts, other stakeholders and ESG impact of underlying holdings. The Trustee will review the platform provider's and the investment managers' ESG and stewardship policies regularly to ensure that they are carrying out their delegated responsibilities.

Investment risk

52 Under defined contribution plans generally, it is the members, rather than the employer, who bear the investment risk. However, under the OMPS, the Trustee recognises that there is an element of risk for the Principal Employer because if on retirement, the value of a member's retirement savings under the OMPS are insufficient to provide the contracting-out underpin, the additional cost needed to provide the contracting-out underpin must be met by the Principal Employer.

53 In addition to the above risk faced by the Principal Employer, the Trustee recognises a number of further risks involved in the investment of assets of the OMPS, including:

Inflation risk:

- is the risk that the real value of contributions made will erode over time and help lead to an inadequate amount of benefit at retirement. This could be by failing to achieve an adequate amount of return in excess of price inflation commensurate with the term of investment.
- is managed by the use of a global equity and long index-linked gilt fund in the lifestyle strategy.

Pension conversion risk:

- is the risk that the value of a member's account when approaching retirement does not reflect the change in the cost of purchasing an annuity at retirement thereby increasing the likelihood of the contracting-out underpin applying.
- is managed by the use of a long index-linked gilt fund in the lifestyle strategy as a member approaches retirement.

Currency risk:

- the risk arising from the added volatility of members investments, due to the currency translation risk assumed from holding non-Sterling assets
- is managed by using a global equity fund that invest in Sterling and non-Sterling assets and is partly currency hedged.

Political risk:

- is measured by the level of concentration of any one market leading to the risk of an adverse influence on investment values arising from political intervention.
- is managed by regular reviews of the actual investments relative to policy and through the level of diversification within the existing policy.

Manager risk:

- is measured by the expected deviation of the return relative to the benchmark set.
- is managed by the use of passively managed investment funds and by monitoring the actual deviation of returns relative to the benchmark index.

D. Additional Voluntary Contributions ("AVCs")

Plan options

54 The Plan provides a facility for members of the CARE Section to pay AVCs to enhance their benefit at retirement. Members are offered a range of options which are identical to those available to the DC section.

The Trustee reviews the suitability of these arrangements when considered necessary.