The Professional Footballers' Pension Scheme (DC sections)

Statement of Investment Principles

Barnett Waddingham LLP

19 September 2024

Contents

1. Introduction

1.1. This is the Statement of Investment Principles prepared by the Trustees and relates to the defined contribution (DC) benefits provided through the Professional Footballers Pension Scheme ("the Scheme"). For the avoidance of doubt, the DC benefits provided through the Scheme are also known as the "2011 Section" and the "Income Section". This statement sets down the principles which govern the decisions about investments that enable the Scheme to meet the requirements of:

- the Pensions Act 1995, as amended by the Pensions Act 2004; and
- the Occupational Pension Schemes (Investment) Regulations 2005 as amended by the Occupational Pension Schemes (Investment) (Amendment) Regulations 2010.
- the Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018.
- the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019.
- The Occupational Pension Schemes (Administration, Investment, Charges and Governance) and Pensions Dashboards (Amendment) Regulations 2023.

1.2. In preparing this statement the Trustees have consulted the Premier League and Football League (as representatives of the Employer Clubs), and obtained advice from Barnett Waddingham LLP, the Trustees' investment consultant. Barnett Waddingham is authorised and regulated by the Financial Conduct Authority for a range of investment business activities.

1.3. The Trustees will review this statement at least every three years or if there is a significant change in any of the areas covered by the statement.

1.4. The investment powers of the Trustees are set out in Clause 16 of the Definitive Trust Deed & Rules, dated 18 September 2015. This statement is consistent with those powers.

2. Choosing investments

2.1. The Trustees carefully consider their Investment Objectives, shown in Appendix 1, when designing the range of investment options to offer to its members. The Trustees also acknowledge that members will have different attitudes to risk and different aims for accessing their retirement savings – and therefore, whilst seeking good member outcomes net of fees, it also considers the level of risk that is appropriate based on the anticipated needs of the membership profile of the Scheme.

2.2. The Trustees' policy is to offer a default investment arrangement suitable for the Scheme's membership profile. Details of these are given in Appendix 1. In doing so, the Trustees consider the advice of their professional advisers, whom they consider to be suitably qualified and experienced for this role.

2.3. The day-to-day management of the Scheme's assets is delegated to one or more investment managers. The Scheme's investment managers are detailed in Appendix 1 to this Statement. The investment managers are authorised and regulated by the Financial Conduct Authority, and are responsible for stock selection and the exercise of voting rights.

2.4. The Trustees review the appropriateness of the Scheme's investment strategy on an ongoing basis. This review includes consideration of the continued competence of the investment managers with respect to performance within any guidelines set. The Trustees will also consult the Premier League and Football League (as representatives of the Employer Clubs) before amending the investment strategy.

3. Investment objectives

3.1. The Trustees have discussed and agreed key investment objectives considering an analysis of the Scheme's membership profile as well as the constraints the Trustees face in achieving these objectives. These are set out in Appendix 1.

4. Kind of investments to be held

4.1. The Scheme is permitted to invest in a wide range of assets including equities, bond, cash, property and alternatives.

5. The balance between different kinds of investment

5.1. The Trustees have made available a default investment option. Members' assets are automatically invested in line with a pre-determined strategy that changes at different stages of membership. For example, whilst a member is assumed to be a long way off accessing their retirement savings, emphasis is placed on medium to higher risk funds (i.e. investment largely in growth assets) in search of long-term, inflation-protected growth. As the member's target retirement date approaches, their retirement savings are progressively switched to hold a larger proportion of lower risk assets which aim to protect the value of the retirement savings relative to the way in which they are expected to be accessed.

5.2. The Trustees consider the merits of both active and passive management for the various elements of the Scheme's portfolio and may select different approaches for different asset classes.

5.3. The Trustees are aware that the appropriate balance between different kinds of investments will vary over time and the asset allocation may change as the membership profile evolves.

6. Risks

6.1. Risk in a defined contribution scheme lies with the members themselves. The Trustees recognise that a number of risks are involved in the investment of assets for the Scheme. They have identified the following principal risks which have the potential to reduce the return achieved on the assets to below their benchmarks:

Platform provider risk	The risk that the Platform Provider, Mobius Life, does not manage the investments in line with the agreed strategy.
Investment Manager Risk	The Trustees monitor the performance of the Scheme's investment managers on a regular basis in addition to having meetings with them from time to time as necessary. The Trustees have a written agreement with each investment manager, through the Platform Provider, which contains a number of restrictions on how the investment manager may operate.
Custodian risk	The risk of failed or inadequate performance by the custodian.

Political risk	The financial risk that a country's government will suddenly change its policies.
Inflation risk	The risk that the investments do not provide a return at least in line with inflation, thus eroding the purchasing power of the retirement savings. The Trustees make available a default investment strategy that is expected to provide a long-term real rate of return.
Conversion risk	The risk that fluctuations in the assets held, particularly in the period before retirement savings are accessed, lead to uncertainty over the benefit amount likely to be received. In the lifestyle arrangement made available as the Scheme's default investment strategy (see Appendix 1), the Trustees change the proportion and type of investments so that in the run up to retirement the investments gradually start to move closely to match how the Trustees expect members to access their retirement savings. The Trustees keep the appropriateness of the default investment strategy under review.
Retirement income risk	The risk that a member's retirement income falls short of the amount expected, whether this is due to lower investment returns than expected or insufficient contributions being paid. The Trustees periodically review the appropriateness of the default investment strategy to ensure member outcomes can be maximised.
Market risk	Each investment manager is expected to manage properly diversified portfolios and to spread assets across a number of individual shares and securities.
Currency risk	The Scheme may gain exposure to overseas currencies by investing in assets that are denominated in a foreign currency or via currency management.
Loss of investment	The risk of loss of investment by the investment manager and custodian is assessed by the Trustees. This includes losses beyond those caused by market movements (e.g. default risk, operational errors or fraud). The Scheme's auditor considers the internal controls and processes of each of the investment managers as part of the review of the Scheme's annual accounts.
ESG risks	The risk posed by environment, social and governance factors (including, but not limited to, climate change).

7. Expected return on investments

7.1. The Trustees have regard to the relative investment return and risk that each asset class is expected to provide. The Trustees are advised by their professional advisors on these matters, whom they deem to be appropriately qualified experts. However, the day-to-day selection of investments is delegated to the investment managers.

7.2. The Trustees recognise the need to distinguish between nominal and real returns and to make appropriate allowance for inflation when making decisions and comparisons.

8. Realisation of investments

8.1. The Trustees have delegated the responsibility for buying and selling investments to the investment managers.

9. Financially material considerations, non-financial matters, the exercise of voting rights and engagement activities

9.1. The Trustees have set policies in relation to these matters. These policies are set out in Appendix 2.

10. Policy on arrangements with asset managers

Incentivising alignment with the Trustees' investment policies

10.1. When appointing an investment manager, in addition to considering the investment manager's investment philosophy, process and policies to establish how the manager intends to make the required investment returns, the Trustees also consider how ESG and climate risk are integrated into these. If the Trustees deem any aspect of these policies to be out of line with their own investment objectives for the part of the portfolio being considered, they will consider using another manager for the mandate.

10.2. The Trustees carry out a strategy review periodically where they assess the continuing relevance of the strategy in the context of the Scheme's membership and their aims, beliefs and constraints. The Trustees monitor the investment managers' approach to ESG and climate related risks on an annual basis.

10.3. In the event that an investment manager ceases to meet the Trustees' desired aims, including the management of ESG and climate related risks, using the approach expected of them, the Trustees will review this investment.

10.4. Investment manager ESG policies are reviewed upon appointment in the context of best industry practice and feedback will be provided to the investment manager.

Incentivising assessments based on medium to long term, financial and non-financial considerations

10.5. The Trustees are mindful that the impact of ESG and climate change has a long-term nature. However, the Trustees recognise that the potential for change in value as a result of ESG and climate risk may occur over a much shorter term than climate change itself. The Trustees acknowledge this in their investment management arrangements.

10.6. When considering the objectives for an investment manager (including ESG and climate risk objectives), and then assessing their effectiveness and performance, the Trustees assess these over a rolling timeframe. The Trustees believe the use of rolling timeframes, typically 3 to 5 years, is consistent with ensuring the investment manager makes decisions based on an appropriate time horizon. Where a fund may have an absolute return or shorter term target, this is generally supplementary to a longer term performance target. In the case of assets that are actively managed, the Trustees expect this longer term performance target to be sufficient to ensure an appropriate alignment of interests.

10.7. The Trustees expect investment managers to be voting and engaging on behalf of the Scheme's holdings and the Scheme monitors this activity within the Implementation Statement in the Scheme's Annual Report and Accounts. The Trustees do not expect ESG considerations to be disregarded by the investment managers in an effort to achieve any short term targets.

Method and time horizon for assessing performance

10.8. The Trustees monitor the performance of their investment managers over medium to long term periods that are consistent with the Trustees' investment aims, beliefs and constraints.

10.9. The Scheme invests exclusively in pooled funds. The investment manager is remunerated by the Trustees based on the assets they manage on behalf of the Trustees. As the funds grow, due to successful investment by the investment manager, they receive more and as values fall they receive less.

10.10. The Trustees believe that this fee structure enables the investment manager to focus on long-term performance without worrying about short term dips in performance significantly affecting their revenue.

10.11. The Trustees ask the Scheme's investment consultant to assess if the asset management fee is in line with the market when the manager is selected, and the appropriateness of the annual management charges are considered periodically.

Portfolio turnover costs

10.12. The Trustees acknowledge that portfolio turnover costs can impact on the performance of their investments. Overall performance is assessed as part of the quarterly investment monitoring process.

10.13. During the investment manager appointment process, the Trustees may consider both past and anticipated portfolio turnover levels. When underperformance is identified, deviations from the expected level of turnover may be investigated with the investment manager concerned if it is felt they may have been a significant contributor to the underperformance. Assessment of these costs reflect market conditions and peer group practices.

Duration of arrangement with asset manager

10.14. For the open-ended pooled funds in which the Scheme invests, there are no predetermined terms of agreement with the investment managers.

10.15. The suitability of the Scheme's asset allocation and its ongoing alignment with the Trustees' investment beliefs is assessed periodically. As part of this review the ongoing appropriateness of the investment managers, and the specific funds used, is assessed.

11. Employer related investments

11.1. The Trustees' policy is not to hold any employer-related investments.

12. Agreement

12.1. This statement was agreed by the Trustees, and replaces any previous statements. Copies of this Statement and any subsequent amendments will be made available to the Premier League and Football League (as representatives of the Employer Clubs), the Scheme's investment managers, and the Scheme auditor upon request. The Statement will also be published on a publicly available website.

This Statement of Investment Principles was approved by the Trustees of the Professional Footballers' Pension Scheme on 19 September 2024.

Appendix 1: Note of investment policy of the Scheme in relation to the current Statement of Investment Principles

1. The balance between different kinds of investment

The Trustees' main investment objectives are:

- to provide a suitable default investment option that is likely to be suitable for a typical member;
- seek to achieve good member outcomes net of fees and subject to acceptable levels of risk;
- to ensure that the expected volatility of the returns achieved is managed through appropriate diversification of asset types;
- to control the level of volatility and risk in the value of members' pension pots; and
- to reduce the risk of the assets failing to meet projected retirement income levels.

The Trustees are responsible for the design of the default investment option.

2. Default Option

The Trustees acknowledge that members will have different attitudes to risk and different aims for accessing their retirement savings, and so it is not possible to offer a single investment option that will be suitable for each individual member. However, having analysed the Scheme's membership profile, the Trustees decided that the lifestyle arrangement set out below represents a suitable default investment option for the majority of members. The aims, objectives and policies relating to the default option are intended to ensure that assets are invested in the best interests of relevant members and their beneficiaries.

The Trustees have appointed Mobius Life Limited as the Platform Investment Manager in respect of the default investment strategy. The Trustees took investment advice both to choose the investment platform and select the funds to be offered to members. Mobius Life Limited is authorised and regulated by the Financial Conduct Authority and has been selected in order to effect cost and operational efficiencies in the management of the assets.

Following a review of the investment strategy and membership analysis carried out by the Trustees' advisers, it was found that a significant numbers of members are expected to have retirement pots of a large enough size that drawing down benefits over time will be the most likely access route (rather than taking a cash lump sum or purchasing an annuity). The Trustees therefore decided that the default arrangement should be based around this method of accessing benefits in retirement.

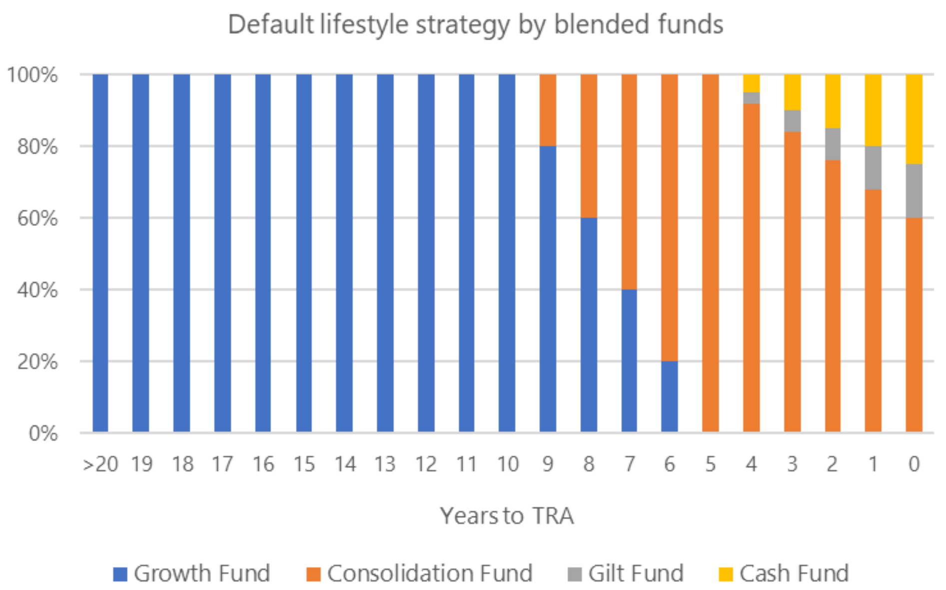
The default option is currently the 10-year lifestyle profile, which progressively switches between four blended funds (i.e. a blend of funds, where the asset allocation is determined by the Trustees). The four blended funds used in the default arrangement are the:

- Growth Fund;
- Consolidation Fund;

- Gilt Fund;
- Cash Fund.

Members' funds are moved from the Growth Fund once they are 10 years from their Target Retirement Age ("TRA"), resulting in 100% of their assets being invested in the Consolidation, Gilt and Cash funds at retirement, as per the chart below. Moving between the funds in this way is done automatically for members and assumes they will be accessing their savings at their TRA.

Members have the option to invest AVCs in the default strategy. In addition, the Trustees have made available a variety of alternative self-select funds, which we have detailed below in Section 3 below.



The investment objectives for each fund is given below.

Platform provider	Fund	Benchmark	Fund objective
Mobius Life	Footballers' Growth Fund	Consumer Prices Index (CPI) + 3.5% p.a.	The Fund aims to produce long-term capital growth. The Fund is designed for members that should expect broadly equity-like returns over the long-term while invested in the Fund.

Platform provider	Fund	Benchmark	Fund objective
	Footballers' Consolidation Fund	CPI + 1.5% p.a.	The Fund aims to produce capital growth over a 5-to-10-year investment horizon with a lower volatility than equities. This Fund has been designed for members between the growth and retirement phase of the Scheme's default investment strategy.
	Footballers' Gilt Fund	FTSE Actuaries UK Conventional Gilts up to 5 Year Index	To track the benchmark.
	Footballers' Cash Fund	7 Day GBP LIBID	To track the benchmark.

The asset allocation of each of the blended funds, as well as the fees for each fund is provided by the member factsheets available with Mobius. Links to these factsheets have been provided in the above tables.

Policy on investing in illiquid assets within the default arrangement

Investment in illiquid assets are expected to bring certain benefits to members including diversification, return enhancement and inflation protection. The Trustees believe these advantages can outweigh the potential disadvantages of reduced liquidity, higher investment fees and higher investment risk.

The Trustees currently invest a portion of members' funds in illiquid assets. Investment is made indirectly, via a multi-asset private markets fund called the Partners Generations Fund which is used within the Footballers' Growth Fund.

The illiquid asset exposure spans the majority of the member's retirement journey. Assuming there is no gating, a member will have exposure to illiquid assets upto five years to Target Retirement Age ('TRA'). The age of these members will depend on each member's TRA, which is variable within the Scheme.

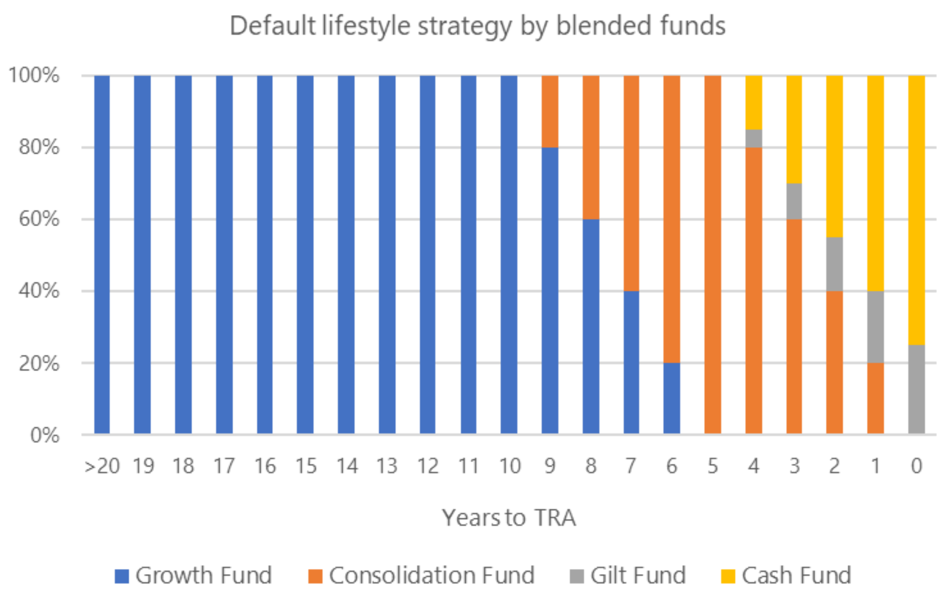
The statements made in the main body of this Statement of Investment Principles also apply to the default arrangement.

3. Alternative investment options

Alongside the default investment option, the Trustees also make available a range of alternative investment options as set out below.

Cash lifestyle option

Similar to the default investment option, the cash lifestyle option utilises a 10-year lifestyle profile, which progressively switches between four funds, as shown in the chart below. To ensure consistency between the lifestyle options, the investments upto 5 years to TRA are the same as those in the default investment option.



The investment benchmarks and the objectives for each fund above are the same as those used in the default investment option shown in Section 2.

Self-select funds

Alongside the cash lifestyle option, members also have the option to invest in a range of self-select funds. These include the funds detailed in the above Section 2, as well as the following funds.

Platform provider	Fund	Fund objective
Mobius Life	Footballers' Equity Fund	The Fund aims to produce long-term capital growth through an investment allocation to global equity securities.
	Footballers' Shariah Equity Fund	This Fund aims to produce long-term capital growth by investing in securities of a range of companies listed across the globe whilst meeting Islamic investment principles.

The performance of the funds will be monitored as frequently as the Trustees considers appropriate in light of the prevailing circumstances. The monitoring takes into account both short-term and long-term performance.

Appendix 2: Financially material considerations, non-financially material considerations, the exercise of voting rights and engagement activities

1. Financially material considerations

The Trustees believe that the consideration of financially material factors, such as Environmental (including climate change), Social and Governance ("ESG") factors in investment decision making are financially material and can lead to better risk adjusted investment returns over the time horizon over which benefits are paid, which may be up to around 40 or 50 years. The Trustees, therefore, have a policy to consider these, alongside other factors, when selecting, retaining or realising the Scheme's investments.

The Trustees have elected to invest the Scheme's assets through pooled funds. The choice of underlying funds is made by the Trustees after taking advice from their investment consultant. The Trustees, and the managers of the underlying funds, take into account ESG factors (including climate change risks) in their decisions in relation to the selection, retention and realisation of investments.

The Trustees expect their investment managers, when exercising discretion in investment decision making, to take financially material ESG factors into account. The Trustees take ESG factors into account in the selection, retention and realisation of investments as follows:

Selection of investments: assess the investment managers' ESG integration credentials and capabilities, including stewardship, as a routine part of requests for information/proposals as well as through other regular reporting channels.

Retention of investments: developing a monitoring process in order to monitor ESG considerations periodically by seeking information on the responsible investing policies and practices of the investment managers.

Realisation of investments: the Trustees will take into account how ESG considerations are utilised in decisions to realise investments.

The Trustees will also take those factors into account as part of its investment process to determine a strategic asset allocation, and consider them as part of ongoing reviews of the Scheme's investments.

The Trustees will continue to monitor and assess ESG factors, and risks and opportunities arising from them, as follows:

- The Trustees will obtain training on ESG considerations in order to understand fully how ESG factors including climate change could impact the Scheme and its investments;
- As part of ongoing monitoring of the Scheme's investment managers, the Trustees will use any ESG ratings information provided by its investment consultant, to assess how the Scheme's investment managers take account of ESG issues; and
- Through their investment consultant the Trustees will request that all of the Scheme's investment managers provide information about their ESG policies, and details of how they integrate ESG into their investment processes when necessary.

2. Non-financially material considerations

Where ESG factors are non-financial (i.e. they do not pose a risk to the prospect of the financial success of the investment) the Trustees believe these should not drive investment decisions. The Trustees expect their investment managers, when exercising discretion in investment decision making, to consider non-financial factors only when all other financial factors have been considered and in such a circumstance the consideration of non-financial factors should not lead to a material reduction in the efficiency of the investment. Members' views are not sought on non-financial matters (including ESG, quality of life considerations and ethical views) in relation to the selection, retention and realisation of investments.

3. The exercise of voting rights

The Trustees believe that in order to protect and enhance the value of the investments, over the time horizon which the benefits are paid, they must act as a responsible asset owner. The Trustees cannot exercise their responsibilities directly as they do not hold investments in their name. The Trustees expect their investment managers to exercise voting rights on all resolutions at annual and extraordinary general meetings of companies. In doing so, the Trustees expect that the investment managers will use their influence as major institutional investors to exercise the Trustees' rights and duties as shareholders, including where appropriate engaging with underlying investee companies to promote good corporate governance, accountability and to understand how those companies take account of ESG issues in their businesses.

The Trustees will monitor their investment managers policies on voting and engagement through the annual Implementation Statement.

The Trustees expect their investment managers to exercise ownership rights attracted to investments, including voting and engagement rights, in order to safeguard sustainable returns over this time frame. On an ongoing basis the Trustees will assess the stewardship and engagement activity of its investment managers through the annual Implementation Statement (delegating to the Investment Consultant where appropriate).

The Trustees will monitor and engage with the investment managers about relevant matters (including matters concerning an issuer of debt or equity, including their performance, strategy, management of actual or potential conflicts of interest, risks, social and environmental impact, and corporate governance), through the Scheme's investment consultant.

4. Engagement activities

The Trustees acknowledge the importance of ESG and climate risk within their investment framework. When delegating investment decision making to their investment managers, they provide their investment managers with a benchmark they expect the investment managers to either follow or outperform. The investment manager has discretion over where in an investee company's capital structure it invests (subject to the restrictions of the mandate), whether directly or as an asset within a pooled fund.

The Trustees are of the belief that ESG and climate risk considerations extend over the entirety of a company's corporate structure and activities, i.e. that they apply to equity, credit and property instruments or holdings. The Trustees also recognise that ESG and climate related issues are constantly evolving and along with them so too are the products available within the investment management industry to help manage these risks.

The Trustees consider it to be a part of their investment managers' roles to assess and monitor developments in the capital structure for each of the companies in which the managers invest on behalf of the Scheme or as part of the pooled fund in which the Scheme holds units.

The Trustees also consider it to be part of their investment managers' roles to assess and monitor how the companies in which they are investing are managing developments in ESG related issues, and in particular climate risk, across the relevant parts of the capital structure for each of the companies in which the managers invest on behalf of the Scheme.

In selecting and reviewing their investment managers, where appropriate, the Trustees will consider investment managers' policies on engagement and how these policies have been implemented.

Conflicts of interest

The Scheme invests solely in pooled funds and the Scheme's investment managers are granted full discretion over whether or not to invest in the Employer Clubs' businesses. A conflict of interest is not therefore expected to arise.

The Scheme's investment consultant is independent and no arm of their business provides asset management services. This, and their FCA Regulated status, makes the Trustees confident that the investment manager recommendations they make are free from conflict of interest.

The Trustees expect all investment managers to have a conflict of interest policy in relation to their engagement and ongoing operations. In doing so the Trustees believe they have managed the potential for conflicts of interest in the appointment of the investment manager and conflicts of interest between the Trustees/investment manager and the investee companies.