

**BRITISH MUSEUM CO. LIMITED
RETIREMENT BENEFITS PLAN**

Statement of Investment Principles

September 2020

BRITISH MUSEUM CO. LIMITED RETIREMENT BENEFITS PLAN

1. Introduction

This Statement of Investment Principles has been drawn up by the BM Co Pension Trustee Company Limited (the Trustees), the Trustees of the British Museum Company Limited Retirement benefits Plan (the Plan) in accordance with Section 35 of the Pensions Act 1995, amended by Section 244 of the Pensions Act 2004 and the Occupational Pension Schemes (Investment) Regulations 2005, the Pension Protection Fund (Pensionable Service) and Occupational Pension Scheme (Investment and Disclosure) (Amendment and Modification) Regulations 2018, and the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019.

2. Decision Making Process

The Trustees

The investment of the Plan's assets is the responsibility of the Trustees and the Plan Rules give the Trustees broad powers on investment. There are no restrictions (however expressed) on any power to make investments by reference to the consent of the Employer.

The Trustees' policy is to seek professional advice on investment strategy. They decide on the investment strategy after considering investment advice from the Investment Consultant. The Trustees recognise that their level of investment expertise must be kept under review in order to be able to critically evaluate this advice.

The Trustees meet regularly and ensure that adequate time is set aside to discuss investment issues. In determining their investment strategy the Trustees address the following:

- the need to consider a full range of asset classes
- the risks and rewards of a range of alternative asset allocation strategies
- the suitability of each asset class
- the need for appropriate diversification
- the Plan's Investment and Funding Objectives

The Investment Consultant

The Investment Consultant advises on an investment strategy appropriate to the investment objectives. This advice is provided after each formal actuarial valuation and on a regular basis between formal valuations. The Investment Consultant also monitors and reports on the performance of the Investment Managers.

The Investment Consultant is paid a fee for their advice and their appointment is reviewed from time to time by the Trustees.

BROADSTONE Corporate Benefits Limited has been appointed as the Investment Consultant to the Trustees, on the basis that their representatives are reasonably believed by the Trustees to be suitably qualified by their ability in, and practical experience of, financial matters and have the appropriate knowledge and experience of the management of the investments of such schemes.

BROADSTONE Corporate Benefits Limited is authorised and regulated by the Financial Conduct Authority.

BRITISH MUSEUM CO. LIMITED RETIREMENT BENEFITS PLAN

The Employer

The Trustees will consult with the Employer as part of the process for deciding on their investment strategy. However, there are no restrictions (however expressed) on any power to make investments by reference to the consent of the Employer.

Delegation

The Trustees have a policy of delegating all day-to-day powers of investment to the Investment Managers who are authorised and regulated by the Financial Conduct Authority.

The safe custody of the Plan's assets is delegated to professional custodians via the use of pooled vehicles.

3. Investment Objectives

Funding Objective

The primary funding objective of the Plan is to ensure, as far as possible, that there are sufficient assets to provide benefits to the Plan members as and when these fall due.

Investment Objectives

The Trustees' high level objectives with regard to investing the Plan assets are to:

- achieve a return which is sufficient, over the longer term, to meet the Funding Objective.
- adopt an approach that recognises the need to balance risk with the achievement of a satisfactory investment return.

Performance Objective

The Investment Managers have each been set Performance Objectives to achieve returns in line with, or in excess of, a benchmark.

4. Investment Strategy

A full investment strategy review was conducted during 2017. However, the Trustees also continually review and refine their strategy, with the latest adjustments detailed below.

Target return funds are designed to be less volatile than traditional investment strategies and further benefits of diversification are being sought by combining more than one target return manager or fund. The Trustees currently agree that a broad split based on a 70% 'growth' portfolio and a 30% 'protection' portfolio split is appropriate. The 'protection' portfolio includes bond like and property funds given that property funds also have some properties that are bond like in nature.

Given their investment objectives, the Trustees have agreed the following strategic asset allocation:

	Strategic Asset Allocation
Growth Portfolio	70%
Protection Portfolio	30%

The assets are held in a combination of pooled funds and are fully and readily realisable.

BRITISH MUSEUM CO. LIMITED RETIREMENT BENEFITS PLAN

The Trustees agreed the range of funds used in the strategy taking into account the maturity of the liabilities. The Trustees are satisfied that the funds selected are consistent with the investment objectives and that the range agreed is sufficiently robust to allow easy adjustment between the funds as the risk appetite changes and the Plan matures.

The Trustees may from time to time decide to change the funds used within the overall investment strategy, and the investment allocation between the funds, as alternatives emerge, funds change, and the Plan develops.

For details on the funds in use by the Plan and the strategic benchmark asset allocation, please refer to the "Funds Currently in Use" document.

5. Cash flow and Rebalancing

New money will be invested (or disinvestments made for required cash flow) on a mechanical basis to bring the asset allocation back to the benchmark strategy as far as possible.

The Trustees are mindful of the need to rebalance the assets of the Plan in line with the Plan's strategic benchmark asset allocation and/or when any control limits are breached. The Trustees will monitor the Plan's actual asset allocation on a regular basis and will decide on a course of action, which may involve redirecting cash flows, a switch of assets, or taking no action, taking into account advice from the Investment Consultant.

6. Expected Return

The Trustees expect the return on assets to be consistent with the investment objective and investment strategy outlined above.

The Trustees expect to generate a return over the long-term range of 3.0% to 3.8% per annum (net of expenses) above long-term Cash (LIBOR). This return is a 'best estimate' of future returns that has been arrived at given the Plan's long-term asset allocation.

The Trustees recognise that over the short term, performance may deviate significantly from this long term expectation. This 'best estimate' will also generally be higher than the estimate used for the actuarial valuation of the Plan's liabilities. For this purpose a more prudent estimate of returns will generally be used, agreed by the Trustees on the basis of advice from the Scheme Actuary.

7. Investment Managers

The Trustees utilise a number of Investment Managers to manage the assets of the Plan. The Investment Managers are regulated by the Financial Conduct Authority.

The Trustees have decided to invest in pooled funds, other collective investment vehicles, and cash. The Plan does not invest directly in stocks, shares, bonds, derivatives etc.

The Trustee entered into contracts with Aberdeen Standard Investments in March 2003, BNY Mellon in August 2013, Aviva Investors in November 2017, and Invesco Perpetual in November 2017.

The Trustees have decided to invest in pooled funds because:

- the Plan is not large enough to justify direct investment in equities or bonds on a cost-effective basis;
- pooled funds allow the Plan to invest in a wider range of assets, which serves to reduce risk; and
- pooled funds provide a more liquid form of investment than certain types of direct investment.

BRITISH MUSEUM CO. LIMITED RETIREMENT BENEFITS PLAN

The Investment Managers appoint individual custodians to hold the securities owned by the Plan.

8. Investment Monitoring

The Investment Managers provide the Trustees with quarterly reports setting out a valuation of the funds and a commentary on performance.

The Investment Managers periodically attend Trustees' meetings in order to report on their activity and performance, to outline their views on future investment conditions, and to answer any questions the Trustees may have.

The Investment Consultant will provide periodic advice to the Trustees commenting on performance and asset allocation.

The Investment Managers will supply the Investment Consultant with sufficient information when requested in order to monitor financial and non-financial performance.

9. Portfolio Turnover Costs

The Trustee expects the Investment Managers to change underlying holdings only to an extent required to meet their investment objectives. The reasonableness of such turnover will vary by fund and change according to market conditions.

The Trustee therefore does not set a specific portfolio turnover target for their strategy or the underlying funds.

The Investment Managers when requested by the Investment Consultant shall provide information on portfolio turnover and associated costs so that this can be monitored, as appropriate.

10. Corporate Governance

The Trustees wish to encourage best practice in terms of activism. The Trustees accept that by using pooled investment vehicles the day-to-day application of voting rights will be carried out by the Investment Managers. Consequently, the Trustees expect the Plan's Investment Managers to adopt a voting policy that is in accordance with best industry practice.

11. Socially Responsible Investment / Environmental, Social, and Governance (ESG)

The Trustees believe that the consideration of financially material Environmental (including climate change), Social and Governance (ESG) factors in investment decision making can lead to better risk adjustment investment returns. The Trustees expect their investment managers, when exercising discretion in investment decision making, to take financially material ESG factors into account. On an ongoing basis the Trustees assess the ESG integration capability of their investment managers.

The Trustees believe that in order to protect and enhance the value of the investments, over the time horizon over which the benefits are paid, it must act as a responsible asset owner. The Trustees expect their investment managers to exercise their ownership rights, including voting and engagement rights, in order to safeguard sustainable returns over this time frame. On an ongoing basis the Trustees assess the stewardship and engagement activity of their investment managers.

BRITISH MUSEUM CO. LIMITED RETIREMENT BENEFITS PLAN

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 reduction in the efficiency of the investment. Members' views are not sought on non-financial matters (including ESG and ethical views) in relation to the selection, retention and realisation of investments.

Responsibility for monitoring the makeup and development of the capital structure of investee companies is delegated to the Investment Managers. The Trustee expects the extent to which the Investment Managers monitor capital structure to be appropriate to the nature of the mandate.

12. Conflicts of Interest

The Trustee maintains a separate conflicts of interest policy and register.

Subject to reasonable levels of materiality, these documents record any actual or potential conflicts of interest in relation to investee companies or the Investment Managers, while also setting out a process for their management.

13. Incentivisation of Investment Managers

The Investment Managers are primarily remunerated based on an agreed fixed annual percentage of the asset value for each underlying fund.

The Trustee does not directly incentivise the Investment Managers to align the approach they adopt for a particular fund with the Trustee's policies and objectives. Instead, the Investment Managers and the funds are selected so that, in aggregate, the returns produced are expected to meet the Trustees' objectives.

Neither does the Trustee directly incentivise the Investment Managers to make decisions about the medium to long-term performance of an issuer of debt or equity, or to engage with those issues to improve their performance. The Trustee expects such assessment of performance and engagement to be undertaken as appropriate and necessary to meet the investment objectives of the funds used by the Plan.

14. Employer Related Investments

The Trustees' policy is not to hold any employer-related investments as defined in the Pensions Act 1995, the Pensions Act 2004 and the Occupational Pension Scheme (Investment) Regulations 2005.

BRITISH MUSEUM CO. LIMITED RETIREMENT BENEFITS PLAN

15. Risks

The Trustees recognise that a number of risks are involved in the investment of the assets of the Plan. It has identified the following principle risks which have the potential to cause deterioration in the Plan's funding level:

- **Solvency risk:** The risk that the Plan has insufficient assets to meet all its liabilities as they fall due.
- **Mismatching risk:** The risk of a significant difference in the sensitivity of asset and liability values to changes in financial and demographic factors.
- **Manager risk:** The failure by the Investment Managers to achieve the rates of investment return assumed.
- **Liquidity risk:** The risk of a shortfall of liquid assets relative to the Plan's immediate liabilities.
- **Custodian risk:** The risk of failed or inadequate performance by the custodian.
- **Concentration Risk:** The risk that the performance of any single investment that constituted a large proportion of the assets would disproportionately influence the overall level of assets.
- **Political risk:** The financial risk that a country's government will suddenly change its policies.
- **Sponsor risk:** The possibility of failure of the Plan's sponsoring employers.
- **Counterparty risk:** The risk that other parties in any trade or position will default, i.e. will renege on their contractual obligations, resulting in a financial loss to the Plan.
- **Interest and inflation risk:** There is a risk that the assets do not move in the same way as the liabilities following a change in fixed and / or real interest rates.

Due to the complex and interrelated nature of these risks, the Trustees consider the majority of these risks in a qualitative rather than quantitative manner as part of each formal investment strategy review. Some of these risks may also be modelled explicitly during the course of such reviews.

The policy of the Trustees is to monitor, where possible, these risks on a regular basis. The Trustees therefore consider:

- The actual funding level versus the Statutory Funding Objective.
- Actual performance versus the Plan's investment and funding objectives.
- Investment Managers' performance versus their respective benchmarks and targets.
- Any significant issues with the Investment Managers that may impact their ability to meet investment performance objectives set by the Trustees.

16. Fee Structures

The Investment Managers are paid a management fee on the basis of assets under management. The Investment Consultant is paid on a project basis which may be a fixed fee or based on time cost, as negotiated by the Trustees in the interests of obtaining best value for the Plan.

The appropriateness of the Investment Managers' remuneration will be assessed relative to market costs for similar strategies, the skill and resources required to manage the strategy, and the success or otherwise a manager has had in meeting its objectives, both financial and non-financial.

BRITISH MUSEUM CO. LIMITED RETIREMENT BENEFITS PLAN

17. Additional Voluntary Contributions ('AVCs')

The Plan provides a facility for members to hold AVCs in policies of insurance with Standard Life Investments. The AVC assets are held quite separately from the other Plan assets.

The AVC arrangements are reviewed from time to time to ensure that the investment performance achieved is acceptable and that the investment profile of the funds remains consistent with the objectives of the Trustees and needs of the members.

18. Best Practice Principles

In October 2008, the Government published the results of its consultation on revisions to the Myners' principles in response to recommendations made by the National Association of Pension Funds (NAPF) in 2007. This takes the form of six high level 'Best Practice' principles set out below, supported by best practice guidance and trustee tools that can be used to assess compliance.

1. Effective decision-making
2. Clear objectives
3. Risk and Liabilities
4. Performance assessment
5. Responsible ownership
6. Transparency and Reporting

The Trustees periodically review their compliance with the best practice Principles. The Trustees believe that they comply with the spirit of the Principles. There may be some instances of deviation from the published 'Best Practice Guidance' on the Principles where the Trustees believe this to be justified.

Review of this Statement

The Trustees will review this Statement at least once every three years and without delay after any significant change in investment policy. Any change will only be made after having obtained and considered the written advice of someone who the Trustees reasonably believe to be qualified by their ability in and experience of financial matters and to have the appropriate knowledge and experience of the management of pension scheme investments.

Jane Whittaker

For and on behalf of the:
The BM CO Pension Trustee company Limited

17 September 2020

Date

Version	Date	Comment
Version 1	March 2017	
Version 2	January 2018	Following Growth Strategy Review
Version 3	September 2019	Updated SIP for ESG
Version 4	September 2020	Updated in line with ESG compliance