UNI-MILL ENGINEERING LIMITED RETIREMENT BENEFITS PLAN

Chairman's Statement Regarding DC Section Governance

Introduction

Governance requirements apply to defined contribution ("DC") pension arrangements, to help members achieve a good outcome from their pension savings. This statement covers the requirements set out in the Occupational Pension Schemes (Scheme Administration) Regulations 1996 ("the Administration Regulations"). It also incorporates the requirements relating to the disclosure and publication of the level of charges and transaction costs within the Occupational Pension Schemes (Administration and Disclosure) (Amendment) Regulations 2018 [SI 2018/233) ("the 2018 Regulations"), which amends the Administration Regulations to reflect these new requirements.

The Trustees of the Uni-Mill Engineering Limited Retirement Benefits Plan (the "Scheme") are required to produce a yearly statement (which is signed by the Chair of Trustees) to describe how these governance requirements have been met in relation to:

- the investment options in which members' funds are invested (this means the "default arrangement" and other funds members can select or have assets in, such as self-select or "legacy" funds);
- the requirements for processing financial transactions;
- the charges and transaction costs borne by members;
- an illustration of the cumulative effect of these costs and charges;
- · a 'value for members' assessment; and
- Trustee knowledge and understanding.

This statement covers the period from 6 April 2022 to 5 April 2023.

This Statement is available online at http://www.uni-mill.com/

You can find the information in the section headed 'Uni-Mill Engineering Ltd RBP'. We can provide the information on request in hard copy form.

If you would like this information please contact Uni-Mill Engineering Limited, Rivermead Drive, Rivermead Industrial Estate, Westlea, Swindon SN5 7EX.

Default investment arrangement

Since the Scheme is closed and no member contributions have been paid in the period since the new regulations came into force on 6 April 2015, there is **no "default arrangement"** as defined by the Occupational Pension Schemes (Investment) Regulations 2005, as amended by the Occupational Pension Schemes (Charges and Governance) Regulations 2015. The Scheme is not being used as a qualifying scheme for automatic enrolment purposes.

Fund selection

There is no investment choice under the Scheme and all members can only invest in the Zurich Assurance Limited 90:10 With Profits fund.

Members hold monies in the Zurich Assurance 2 EP and 2a EP Unitised With-Profits funds. An underlying bonus guarantee of 4% per annum applies to the 2 EP fund and 1% per annum guarantee for the 2a EP fund (contributions paid since 1 July 2003 were paid into this fund). A final bonus may be payable at maturity.

As the Scheme has fewer than 100 members, there is no requirement for a Statement of Investment Principles (SIP) to be in place for the Scheme.

The Trustee has a specific duty to secure that core financial transactions relating to the money purchase assets (including the transfer of member assets out of the Scheme, transfers between different investments within the Scheme and payments to and in respect of members/beneficiaries) are processed promptly and accurately. The Scheme is closed and therefore no contributions or transfers are received into members' money purchase accounts.

The only financial transactions undertaken by the Scheme's administrator, Zurich Assurance, are the processing of any transfers out of the Scheme and payments to members/beneficiaries. From the information provided by the administrator it is evident that all core financial transactions have been processed promptly and accurately during the Scheme year and no material issues in relation to the payment of member/beneficiaries' benefits arose during the year.

The Trustee therefore considers that the requirements for processing core financial transactions specified in the Administration Regulations have been met, that there have been no material administration errors, and that all core financial transactions have been processed promptly and accurately during the Scheme year.

When preparing this section of the statement the Trustee has taken account of the relevant statutory guidance.

Member-borne charges and transaction costs (value for members)

The Trustee is required to set out the ongoing charges borne by members in this statement, which are annual fund management charges plus any additional fund expenses, such as custody costs, but excluding transaction costs. This is also known as the total expense ratio ("TER"). The TER is paid by the members and is reflected in the unit price of the funds.

For investments in the Zurich Assurance 90:10 With Profits fund, there are no explicit annual fund management charges but the expense of managing the fund is one of the factors that will influence the amount of a final bonus when the plan value is paid out. In recent years Zurich Assurance advises that the deductions from the fund have been less than 1% a year. For the purposes of the illustrations, Zurich Assurance has assumed a fund manager charge of 1% per annum.

The Trustee is also required to separately disclose transaction cost figures that are borne by members. Transaction costs are the costs incurred in buying and selling assets in the fund. Zurich Assurance has shown costs for the year to 31 March 2023. Assumed transaction costs are the charges that are assumed to apply in the illustrations.

Details of how Zurich Assurance manages the With Profits fund can be found at this link: https://www.zurich.co.uk/with-profits/90-10-with-profits-fund-explained

The charges and transaction costs have been supplied by Zurich Assurance when preparing this section of the statement the Trustee has taken account of the relevant statutory guidance.

Current investments

Fund	Fund Charge	Manager	Transaction costs	Assumed transaction	future costs
With Profits 2 / 2A	See note below		0.06% per annum	0.08% per annum	

Illustration of charges and transaction costs

Over a period of time, the charges and transaction costs that are taken out of a member's pension savings can reduce the amount available to the member at retirement.

The table below shows the projected pension pot both before and after charges are deducted for a member aged 40 whose starting pot is assumed to be £19,000. This illustration has been calculated in line with the statutory guidance.

	Projected pension pot in today's money for a member aged 40 (£) —						
Years	Before charges deducted	After charges deducted	Before charges deducted	After charges deducted			
	With-Profits 2	With-Profits 2	With-Profits 2A EP	With-Profits 2A EP			
1	19,200	19000	19,200	19,000			
3	19,600	19,200	19,600	19,100			
5	20,000	19,400	20,000	19,300			
10	21,000	19,900	21,000	19,600			
15	22,200	20,300	22,200	19,900			
20	23,400	20,800	23,400	20,200			
25	24,600	21,300	24,600	20,500			

As each member has a different amount of savings within the Scheme and the amount of any future investment returns and future costs and charges cannot be known in advance, the Trustee has had to make a number of assumptions about what these might be. The assumptions are explained below:

- 1. It is assumed that the member is aged 40 at the start of the projection and retires after 25 years at age 65.
- 2. The starting pot size (transfer value) is assumed to be £19,000.
- 3. Inflation is assumed to be 2.5% each year.
- 4. It is assumed that no further contributions are paid.
- 5. The charges assumed are 1.00% a year for the fund management costs and 0.06% a year for transactions, as provided by Zurich Assurance.
- 6. The projected growth rate used is 1% above inflation.

The "before costs" figures represent the savings projection assuming an investment return with no deduction of member borne fees or transaction costs. The "after costs" figures represent the savings projection using the same assumed investment return but after deducting member borne fees and an allowance for transaction costs.

Notes

- Values shown are estimates and are not guaranteed. The illustration does not indicate the likely variance and volatility in the possible outcomes from each fund.
- The numbers shown in the illustration are rounded to the nearest £100 for simplicity.
- Projected pension pot values are shown in today's terms, and do not need to be reduced further for the effect of future inflation.

The table below shows the annualised net investment returns for 1-,5-,10-,15- and 20-year periods ending on 5 April 2023 for all funds that members of the scheme are able to select.

The annualised returns are net of all fund charges related to the funds and are the returns applicable to a member with a fund of £10,000 who makes no further contributions over the period.

Average return each year							
Fund	20 Years (2002-2022)	15 Years (2007-2022)	10 Years (2012-2022)	5 Years (2017-2022)	1 Year (2021-2022)		
Zurich With Profits 2 EP*	7.0%	6.7%	6.8%	4.9%	-8.3%		
Zurich With Profits 2a EP*	N/A	6.9%	7.0%	3.7%	-8.1%		

^{*}For with profits funds the annualised investment return shown is based on the growth in the surrender value for a fund of £10,000. This is not solely owing to the investment return on the underlying assets. For further information on the unitised with profits funds **see link.**

Value for members assessment

The Trustee is required to make an assessment of charges and transaction costs borne by money purchase section members and the extent to which those charges and costs represent good value for money for members. The Trustee broadly interprets "good value" as meaning that the combination of costs and what is provided in return for those costs is appropriate for the Scheme membership as a whole, when compared to other options available in the market. The Trustee notes that good value for money does not necessarily mean the lowest charges available, and the quality of service received is also considered in the assessment.

The Trustee's advisers have confirmed that the fund charges are competitive for the type of investment available to members, given the nature of the underlying guarantees that are provided.

Overall, the Trustee believes that members of the Scheme are receiving fair value for money for the charges and cost that they incur. The Trustee believes this because the Scheme's investment fund provides a smoothed growth rate with underlying guarantees.

Trustees' knowledge and understanding

Sections 247 and 248 of the Pensions Act 2004 set out the requirement for trustees to have appropriate knowledge and understanding of the law relating to pensions and trusts, the funding of occupational pension schemes, investment of scheme assets and other matters to enable them to exercise their functions as trustees properly. This requirement is underpinned by guidance in the Pensions Regulators Code of Practice 07.

The Scheme's lay trustees are Directors (of the Company) and are required to maintain appropriate levels of knowledge and understanding to run the Scheme effectively.

Each lay trustee must be conversant with the trust deed and rules of the Scheme, and any other document recording policy for the time being adopted by the Trustee relating to the administration of the Scheme generally. Each trustee will have, to the degree that is appropriate for the purposes of enabling the individual properly to exercise his or her functions as a trustee, knowledge and understanding of the law relating to pensions and trusts and the principles relating to investment the assets of occupational pension schemes.

All the trustees are familiar with and have access to copies of the current Scheme governing documentation, including the Trust Deed & Rules (together with any amendments). In practice, the Scheme is paid-up (no contributions are paid) and there is no investment choice for members. Decision-making is therefore limited in scope. Further, the trustees request advice from external advisers and therefore consider that they have sufficient knowledge and understanding of the law relating to pensions and trusts and of the relevant principles relating to the investment of occupational pension schemes to fulfil their duties.

Taking into account the knowledge and experience of the trustees with the advice received from the appointed professional advisors, the Directors believe they are well placed to exercise their functions as trustees of the Scheme properly and effectively.

Date: 18/10/2023

Signed by the Chair of Trustees of the Uni-Mill Engineering Limited Retirement Benefits Plan