

Statement of Investment Principles (SIP)
The Bennie Holdings Ltd Retirement Benefit Scheme

October 2020

Effective investment performance assessment

The Trustees are invested with A&J Wealth Management Ltd who provide the Trustees with regular information on each funds' performance.

The Trustees, or their advisers on behalf of the Trustees, will regularly review the activities of the Investment Managers, Blackrock, BNY Mellon, CFP SDL Buffetology, Fidelity, Fundsmith, LF Gresham House, Lindsell Train, Merian, Royal London, Threadneedle and Vanguard to satisfy themselves that they continue to carry out their work competently and have the appropriate knowledge and experience to manage the Scheme assets.

The Trustees are invested in a discretionary fund managed by A&J Wealth and these investments are reviewed on a minimum of a weekly basis with an internal team managing daily.

As part of this review, the Trustees will consider whether or not the Investment Managers are carrying out their functions competently. The Trustees will evaluate the discretionary managed fund based on, amongst other things:

- Their performance versus its benchmark.
- The level of risk within the funds, given any specified risk tolerances.
- The competitiveness of their fees is reviewed on an annual basis.
- The suitability of each investment and each category of investment.
- In exercising their powers of investment with a view to giving effect to the principles contained in this SIP, so far as is reasonably practical.
- If the Trustees are not satisfied with A&J they will ask them to take steps to rectify the situation. If A&J still does not meet the Trustees' requirements, the Trustees will remove them and appoint another Investment Manager with immediate effect.
- The Scheme invests in pooled funds, the duration of which is flexible, and the Trustees will from time-to-time consider the appropriateness of the funds and whether they should continue to be held.
- The Trustees do not directly monitor turnover costs. However, A&J Wealth are incentivised to minimise costs as they are measured on a net of cost basis. They are required to provide transaction cost information on an annual basis, on the slippage cost methodology, for disclosure to members. This information is always available with 24 hours' notice.
- In addition, the Trustees will now further evaluate and monitor A&J Wealth for their exercising of responsible investing activities, which may include voting and engagement, in respect of the Scheme's investment and in accordance with their stated or agreed policies and as may be further agreed with the Trustees.

Corporate Governance and Stewardship Policy

The Trustees do now seek alignment of objectives with its Investment Managers in respect of responsible investment considerations and will monitor policy and stewardship activities going forward.

The Trustees also recognise the merits of working with others in the industry to agree, develop and report against accepted responsible investing standards and benchmarks and this is a focus for the

future. The Trustees currently await full publication and awareness of the EU's action plan on Sustainable Finance including the taxonomy to be applied to funds and its potential impact. In addition the Trustees will seek to incorporate new benchmarks for carbon footprints as these become more widely adopted.

Monitoring

The Trustees meet on a quarterly basis to review performance of all investments and plan both short and long term strategies. During the Covid crisis these meetings moved to monthly and The Trustees have the power to request ad-hoc meetings.