



Cumbria Pension Fund – Fund Policy Document

4 INVESTMENT STRATEGY STATEMENT

4.1 Introduction

The principal powers under which an LGPS invests are contained in the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016. These regulations require an Administering Authority to prepare, maintain and publish an Investment Strategy Statement (ISS). The aim of the ISS being to formulate a policy for the investment of its Fund money, which must be in accordance with guidance issued by the Secretary of State. The Regulations require that the ISS must be reviewed and, if necessary, be revised at least every 3 years and a statement of any revisions published.

An in-depth review of investment strategy was undertaken following the completion of the 2022 actuarial valuation. This strategy review was informed by a revised Responsible Investment Policy approved by Pensions Committee in March 2024 following broad engagement with key stakeholders. The revised investment strategy, and this ISS, were approved by Pensions Committee in June 2024. The Director of Resources (S151 Officer) is responsible for implementing the investment strategy.

The Investment Strategy Statement (ISS) outlines the Fund's investment strategy, and how the investment risk and return issues are managed relative to the Fund's investment objectives. It should be read in conjunction with the Funding Strategy Statement (FSS) which sets out how solvency risks are managed with regard to the underlying pension liabilities.

The Administering Authority has consulted with appropriate persons in preparing the ISS (such as investment advisors and the actuary) and taken and acted on any advice received. The Pensions Committee agrees to ensure the ISS will be kept under review and updated when necessary and is published on the Fund's website, www.cumbriapensionfund.org.

The ISS covers the following:

- Background (4.2)
- Approach to investment (4.3)
- Types of investments and limits (4.4)
- Approach to risk (4.5)
- Approach to pooling (4.6)

- Stewardship, responsible investment and corporate governance (4.7)
- Policy on exercise of rights (4.8)
- Compliance of Cumbria Pension Fund with the Updated Myners Principles (4.9)
- Cumbria LGPS Investment Beliefs (Annex A)

4.2 Background

The Cumbria Pensions Committee ('the Committee') is delegated to exercise Westmorland and Furness Council's responsibility as Administering Authority for the management of Cumbria Local Government Pension Scheme ("Cumbria Pension Fund" or the "Fund"). The Terms of Reference include approving the investment strategy for the Pension Fund.

4.2.1 Cumbria Pensions Investment Sub Group (ISG)

The Pensions Committee shall establish a Pensions Investment Sub Group (ISG). The working group has an advisory role; its purpose is to assist the Committee by:

- Carrying out investment asset class monitoring; i.e. monitoring investment performance and the progress of the implementation of the Cumbria Pension Fund's Investment Strategy.
- Providing an update report to Pensions Committee outlining investment performance during the preceding period, and escalating any matters of concern or for further consideration to the Pensions Committee.
- Where appropriate to giving initial consideration to investment opportunities prior to their being considered by Pensions Committee.

4.2.2 The investment objectives of the Fund

The investment objectives are:

- For the Fund to achieve and maintain a funding level of at least 100% in the long-term. This target will be reviewed following each triennial actuarial valuation.
- To achieve an investment return which exceeds the actuary's long term assumptions, whilst also:
 - Having regard to the desirability of enabling employer contribution rates to be kept at a reasonable and affordable cost to the taxpayers and the scheduled, resolution and admitted bodies;
 - Maximising the returns from investments within reasonable risk parameters taking into account the above.

4.3 Approach to investment

The Fund has adopted a prudent, risk aware investment strategy, which is kept continually under review through an annual evaluation of the Funding Strategy. Asset allocation decisions are taken in the best long-term interest of Fund employers and member beneficiaries.

The Fund's Statement of Investment Beliefs is included at **Annex A** to this policy and the overarching objective is to manage a sustainable and solvent Local Government pension fund on behalf of current and future members of the Fund.

In line with the above overall objective, the Fund will invest money in a wide variety of investments, having assessed the suitability of particular investments; the investment objectives, the impact of different economic scenarios on achieving required returns, and the resulting diversity across the whole Fund.

The Fund has a Responsible Investment Policy which informs its approach to investments, through the Investment Strategy. This RI policy is available on the Fund's website at:

<https://www.cumbriapensionfund.org/media/2uuf3xan/2024-03-14-ri-policy-approved-by-pensions-committee.pdf>

Prior to any such decisions being made the Fund will take appropriate advice.

4.3.1 Investment Strategy Review

A full review of investment strategy will normally be undertaken every three to five years by specialist professional advisors. The investment strategy (including the core investment objectives and asset allocations) is set to meet long-term prevailing market conditions and address any short term cashflow requirements. Interim reviews may be undertaken to ensure that the investment strategy remains appropriate. Any review of the investment strategy is mindful of the Fund's approach to responsible investment as detailed within its Responsible Investment Policy.

The Fund will operate a Fund-specific investment strategy which reflects the circumstances of the Fund. Therefore, it is not always appropriate to compare the Fund directly with external comparators. Nevertheless, regard will be paid to them over the longer term to ensure the Fund's performance remains comparative to similar funds.

4.4 Types of investments and limits

The Fund will hold a range of asset classes as set out in the table below. These will be reviewed periodically in light of market conditions. As is appropriate all asset classes and products will be kept under regular review.

In addition to considering the benefits of individual products and asset classes for introduction into the strategy, consideration will be given to how the inclusion affects the overall risk/return characteristics of the total portfolio. Before any investment decisions are made by the Pensions Committee, professional advice will be sought.

An in-depth review of Investment Strategy was undertaken following the completion of the 2022 actuarial valuation. The revised investment strategy was approved by Pensions Committee in June 2024 as shown below.

Asset/Investment	Target allocation %	Range %
Public Equity	35%	30-40%
Private Equity	7%	3-11%
TOTAL EQUITY	42%	35-49%
Government Index-Linked Bonds	16%	13-19%
Private Debt / Credit	10%	6-14%
Multi Asset Credit	8%	5-11%
TOTAL FIXED INCOME	34%	29-39%
Infrastructure	12%	11-19% (combined)
Climate & UK Opportunities	3%	
Property	8%	5-11%
TOTAL REAL ASSETS	23%	18-28%
CASH	1%	0-4%
	100%	

As short-term market movements will affect the actual allocations, monitoring will take place on a quarterly basis, and any deviations from the stated ranges in the above table will be reported to the Chair of the Pensions Committee and Director of Resources, to the Investment Sub Group and thereafter to the next meeting of the Pensions Committee.

No more than 5% of the Fund will be invested in entities which are connected with the Administering Authority within the meaning of section 212 of the Local Government and Public Involvement in Health Act 2007. The current strategy has no such investments.

4.5 Approach to Risk

4.5.1 Risk Management and reporting

Risk management is the process by which the Administering Authority systematically identifies, addresses and reports the risks associated with its pension fund activities; it is a key element of good governance for any organisation.

Officers of the Fund maintain a Cumbria LGPS risk register (details of the format of the register and the methodology for measurement of risk can be found in the Internal Control & Risk Management Policy). The risk register is a dynamic document, which is reviewed at every Pensions Committee and Pension Board meeting. It incorporates details of the major risks facing the Fund and includes a traffic light scoring system to categorise the anticipated likelihood and impact of each risk. The Committee is responsible for actively monitoring progress in relation to controls and actions taken to mitigate risk.

4.5.2 Appetite for Risk

Risk is inherent in any investment or operational activity and the Committee recognises that it has a need to take risk (e.g. investing in return-seeking assets) to help it achieve its funding objectives. It is also recognised that, whilst increasing risk may increase potential returns over the long-term, it also increases the risk of more short-term volatility in the funding position. The Fund therefore seeks to achieve a balance between seeking to deliver its target returns and minimising overall portfolio risk rather than try to eliminate it.

The Pensions Committee has determined that the Fund's appetite for risk is conservative, based on delivering long-term stable returns in line with prudently set actuarial targets. The Committee believes that a key tool in achieving this is investing in a well-diversified portfolio, taking into account the consideration of local, national and international risks, including:

- **Valuation (volatility) risk:** the actuarial valuation assumes that the Fund generates an expected return equal to or in excess of the Fund's discount rate. An important risk to which the Fund is exposed is that the return is not achieved, e.g. due to unexpected increases in inflation, changes to interest rates, market cycle or Environmental, Social and Governance (ESG) factors, such as climate change. Key mitigations in relation to this risk include:
 - The inflation-linked discount funding basis.
 - The Fund's Investment Strategy incorporates approximately 35% of assets whose returns have some link with inflation.
 - Investing in a diverse portfolio of investments;
 - Being a responsible owner, incorporating ESG considerations, such as climate change into investment decisions by minimising the risk of stranded assets and the financial impact of regulatory change; and
 - Setting performance and/or risk targets for investment managers to avoid undue risk.

- **Changing demographics:** The risk that longevity improves, and other demographic factors change, increasing the cost of Fund benefits. The key mitigation in relation to this risk is detailed consideration of long-term demographic trends (at both local and national level) as part of the actuarial valuation process which is currently conducted at least triennially.

- **Concentration risk:** The risk that a significant allocation to any single asset category and its underperformance relative to expectation would result in difficulties in achieving funding objectives. The Fund seeks to mitigate this through investing in a diversified portfolio of assets. This risk is also managed through a review of the Fund's Investment Strategy every three to five years and interim reviews undertaken as required.

- **Liquidity risk** (not having monies available to make pension payments to members as they fall due): The Committee recognises that the Fund is long term in nature and can therefore afford to lock up capital for longer in return for the premium it offers. However, it is also recognised that, as the Fund's membership

matures, there is a risk that the Fund will turn cashflow negative after investment income. To mitigate this risk, the review of investment strategy included long-term cashflow projections and concluded that investment income is expected to be sufficient to pay pension benefits in the medium-term and is reviewed on a regular basis. The Fund also undertakes shorter-term cashflow planning, monitoring and management throughout the year.

- **Foreign exchange risk** (the risk of reduction in value arising from exchange rate movements of foreign currencies): The Fund mitigates this through maintaining unhedged listed equity exposure (to aim to provide protection during extreme market falls) and to hedge other lower-risk assets where practical and possible. The use of active management also helps to manage this risk.
- **Governance:** members of the Committee and Local Pension Board participate in regular training delivered through a formally agreed training plan and a training policy. Both the Committee and Local Pension Board are aware that poor governance and in particular high turnover of members may prove detrimental to the investment strategy, fund administration, liability management and corporate governance and seeks to minimise turnover where possible. The Local Pension Board and external and internal audit assist the Pensions Committee in the governance process.
- **Counterparty risk:** Counterparty risks exist in all external transactions undertaken by the Fund. The Fund seeks to mitigate this risk through the use of reputable service providers who operate effective controls. Key tools in this process are the use of advisors, robust procurement and ongoing contract monitoring and management.

4.6 Approach to Pooling

4.6.1 The Fund's investment pool

Westmorland and Furness Council is a shareholder in Border to Coast Pension Partnership Limited ("BCPP"), which is the chosen investment pool for Cumbria Pension Fund. BCPP is an FCA-regulated Operator and Alternative Investment Fund Manager ("AIFM"). BCPP became operational in June 2018.

BCPP is a partnership of the following LGPS funds:

- Bedfordshire Pension Fund
- Cumbria Pension Fund
- Durham Pension Fund
- East Riding Pension Fund
- Lincolnshire Pension Fund
- North Yorkshire Pension Fund
- South Yorkshire Pension Fund
- Surrey Pension Fund
- Teesside Pension Fund
- Tyne and Wear Pension Fund
- Warwickshire Pension Fund

4.6.2 The Fund's approach to pooling

BCPP has been created by like-minded funds, its guiding principles include:

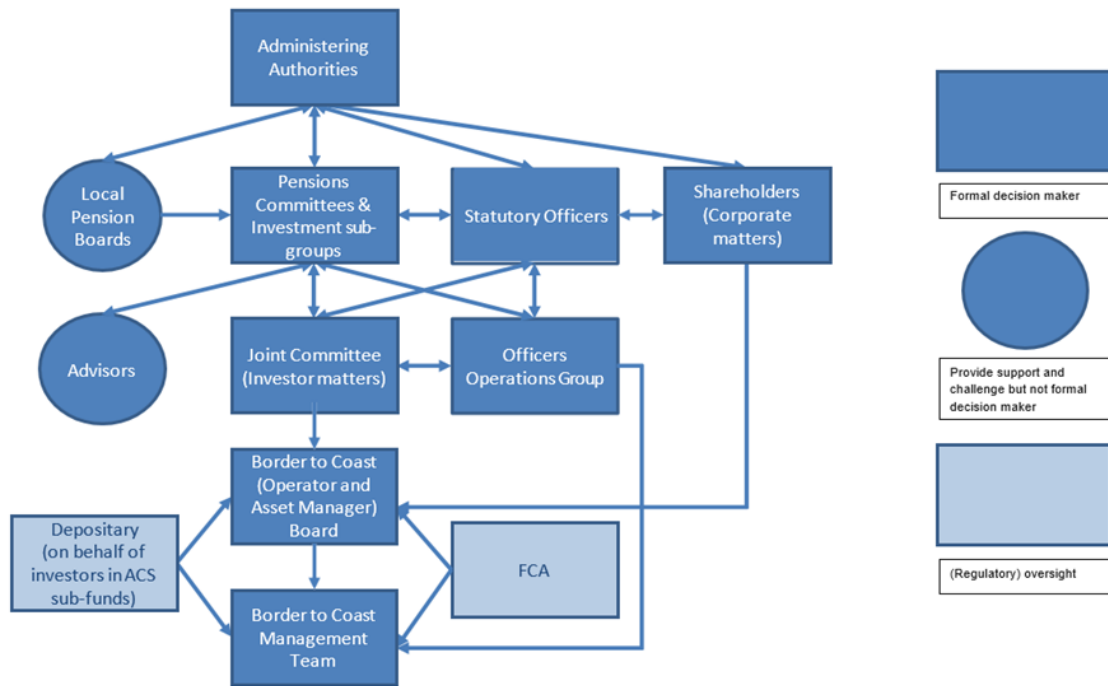
- One fund one vote, regardless of size, all Funds will be treated equally;
- Equitable sharing of costs (where possible);
- Funds retaining governance role and ownership of asset allocation;
- Providing internal management capability; and
- Generating improved net of fees risk-adjusted performance.

The aim of pooling assets for the partner funds is to maximise the long-term net of fees investment returns. All partner funds accept that if savings are to be achieved, changes will be required through the rationalisation and standardisation of processes.

There is clear segregation between duties undertaken by the Fund and duties undertaken by BCPP. The Fund retains the decision-making powers regarding investment strategy and asset allocation, and delegates some investment management functions to BCPP. This ensures that the fiduciary duty and democratic responsibility of the Fund can be maintained, whilst facilitating the delivery of cost benefits and the expanded professionalisation of the investment functions through scale.

BCPP has an internal team of investment managers, in addition to appointing external managers. Its role is to independently and professionally deliver partner funds asset allocation choices. It makes decisions relating to and monitors the investment managers (including employees of the BCPP Pool).

The diagram below details the governance structure of BCPP and how it interacts with the various governance arrangements within the Partner Funds and key external entities:



Cumbria LGPS holds BCPP to account through the following mechanisms:

- A representative on the Shareholder Board, with equal voting rights, who provides oversight and control of the corporate operations of BCPP (Director of Resources).
- A representative on the Joint Committee who will monitor and oversee the investment operations of BCPP (Chair of Pensions Committee).
- Cumbria officers participating in the Officer Operations Group and the Statutory Officers Group.
- The Fund monitors and regularly reviews the investments under BCPP's management, seeking explanation and attendance of BCPP personnel at meetings where necessary.

Further details of the Governance of BCPP can be found in the BCPP Governance Charter:

<https://www.bordertocoast.org.uk/wp-content/uploads/2022/03/Border-to-Coast-Pensions-Partnership-Governance-Charter-2023.pdf>

4.6.3 Assets to be invested with the Pool

The Fund's intention is to invest its actively managed assets through the BCPP pool as and when suitable investment solutions become available. The key criteria for assessment of pool solutions will be as follows:

- That BCPP enables access to an appropriate solution that meets the objectives set by the Fund; and
- That there is financial benefit to the Fund in investing in the solution offered by BCPP.

At 31 March 2024 investments of £1.75 billion (representing approximately 51% of the Fund in total) were held in BCPP's UK Equity, Global Equity, Overseas Developed Equity, Private Equity, Infrastructure, Multi-Asset Credit and Private Credit funds. The Fund has also committed to transferring its eligible directly owned properties to the BCPP UK Property ("real estate") fund.

The Fund undertakes due diligence before and during the transition of assets to BCPP to ensure the interests of Cumbria LGPS are upheld.

The Fund retains the following assets outside of the BCPP pool at 31 March 2024:

- Passive investments with Legal and General (18% of the Fund). These are currently held through life policies and these will remain assets of the Fund. However, the Fund benefits from joint procurement/fee arrangements with other partner funds and BCPP for these services. Monitoring of the manager continues to be carried out by the Fund.
- Legacy investments in a number of closed-ended funds which invest in private markets from commitments made in the years before options with the pool were available (15% of the Fund). These include private equity, infrastructure, private debt, and residential property investments. Each of the individual funds has a fixed life with all assets being returned to investors within a specified period. There is a risk that sales of these investments would only be possible at material discounts to net asset value. Therefore, the Committee believes that it is in the best interests of the Fund to retain these investments. It is anticipated that once these investments mature the proceeds will be reinvested with BCPP.
- Specialist long-lease property funds (2% of the Fund). Options to transfer these to BCPP have been considered and rejected. They will be retained by the Fund due to their lower-risk, inflation protection attributes and the risks and costs of transfer. Options will continue to be reviewed as they are developed.
- A small number of investments in open-ended funds which invest in infrastructure, multi-asset credit, and cash funds to maintain cashflow (total 9% of the Fund at 31 March 2024). The Fund will explore the business case for transferring these assets to BCPP to determine if it is practical and cost effective to do so.
- The Fund has committed to the transfer of Cumbria's (eligible) direct property portfolio to BCPP and this is expected to take place later in 2024 (total 5% of the Fund at 31 March 2024).

The Fund will perform a review of assets held outside the pool at least every three years to determine whether the rationale remains appropriate, and whether it continues to demonstrate value for money.

4.7 Stewardship, Responsible Investment and Corporate Governance

The Fund's commitment to responsible investment, corporate governance and stewardship is communicated through:

- The Fund's Responsible Investment Policy; and
- the Fund's Stewardship Report 2022/23, which focuses on activities and outcomes.

These are available on the Fund's website at:

<https://www.cumbriapensionfund.org/media/2uuf3xan/2024-03-14-ri-policy-approved-by-pensions-committee.pdf>

<https://www.cumbriapensionfund.org/media/q5jbpxcb/clgps-stewardship-report-2022-23-final-v2.pdf>

The Stewardship report has been assessed by the Financial Reporting Council (FRC) as meeting the requirements of the UK Stewardship Code 2020¹ and consequently Cumbria Local Government Pension Scheme is listed as a signatory to 'the Code' which authorises the Fund to utilise the following logo.



All other investment managers are now either signatories to or working towards the new requirements of the Stewardship Code. The Fund expects its investment managers to incorporate ESG factors into their investment process and demonstrate the outcomes being achieved through this activity.

BCPP partner funds have collaborated to create the BCPP Responsible Investment Policy to exercise collective stewardship and shareholder voting rights effectively through leveraging the benefits of scale. The Responsible Investment policy is reviewed annually.

All partner funds, including Cumbria, have agreed that their individual Responsible Investment policies will be broadly aligned to that of BCPP. This should not create material changes to any partner fund's policy as they are likeminded and BCPP's policy was created with reference to the partner fund's existing policies.

Further details of the BCPP Responsible Investment Policy can be found at:
<https://www.bordertocoast.org.uk/wp-content/uploads/2024/01/Border-to-Coast-RI-Policy-2024-FINAL-External-PDF.pdf>

¹ The Financial Reporting Council's (FRC) UK Stewardship code 2020 sets high expectations on those investing pension fund monies. It seeks to set a clear benchmark for stewardship as the responsible allocation, management and oversight of assets to create long term value and lead to sustainable benefits for the economy, the environment and society.

BCPP has also published a standalone Climate Change Policy, which details how it fulfils its commitment to managing the risks and opportunities associated with climate change.

BCPP also published a Responsible Investments and Stewardship report 2022/23: https://www.bordertocoast.org.uk/wp-content/uploads/2023/07/Border-to-Coast-Responsible-Investment-Stewardship-Report-22_23.pdf.

Cumbria is a member of the Local Authority Pensions Fund Forum (LAPFF), a collaborative shareholder engagement group which brings together 86 local authority pension funds from across the UK with combined assets of approximately £350 billion, in addition six of the LGPS Pools have joined the forum. LAPFF seeks to protect the investments of its members by promoting the highest standards of corporate governance and corporate social responsibility (i.e. responsible action by the companies in which its members invest) on environmental, social and governance (ESG) issues (including climate change).

4.8 Policy on exercise of rights

The informed use of votes, while not a legal duty, is a responsibility of the owners of companies (shareholders or ourselves as a pension fund) and as such is an implied fiduciary duty of pension funds. The Fund believes it has a duty to safeguard shareholder value.

The responsibility for the exercise of voting rights is delegated to the investment managers, however Cumbria LGPS has the opportunity to override votes if considered appropriate. Investment managers are expected to approach voting with the same care and attention as other matters which influence investment decisions. Voting should be undertaken where it is believed to be in the best interests of the Fund.

Where a resolution is put forward which is deemed to be controversial the manager should liaise with the authority as appropriate. Investment managers need not vote on routine issues.

- **Actively managed listed equities:** The Fund's investments in actively managed liquid equities are held with BCPP. BCPP's Corporate Governance and Voting Guidelines, which are reviewed annually in consultation with partner funds, can be found at:
<https://www.bordertocoast.org.uk/wp-content/uploads/2024/01/Border-to-Coast-Corporate-Governance-Voting-Guidelines-2024-FINAL-EXTERNAL.pdf>
- **Passive listed equities:** The structure of the Fund's investments in Legal and General Investment Management's (LGIM) passive pooled funds means that it cannot directly influence the social, environmental and governance policies and practices of the companies in which the pooled funds invest. The Fund regularly monitors and is satisfied that LGIM's Corporate Governance policy appropriately reflects the key principles of responsible investment, and ESG issues, including climate change.
Details of Legal and General Investment Management's approach to responsible investment can be found at:

https://www.lgim.com/landg-assets/lgim/_document-library/capabilities/lgim-uk-corporate-governance-and-responsible-investment-policy.pdf

The Fund's investment managers are required to report quarterly on their voting actions. The Fund's investment managers should hold and make available to the Fund a full voting audit trail. The outcome of voting actions should also be shown if possible.

Officers monitor relevant corporate governance issues arising during the period and inform Pensions Committee of any material items arising.

4.8.1 Other rights

Responsibility for actioning any other rights within the portfolio is delegated to the investment managers, i.e. stock splits, rights, scrip dividends or other share entitlements. Investment managers are expected to approach this with the same care and attention as other matters which influence investment decisions and in the best financial interest of the Fund. Exercise of such discretions is reviewed during the manager engagement reviews.

4.9 Compliance of Cumbria Fund with the Updated Myners Principles

Principle 1: Effective Decision Making	Not Compliant	Fully Compliant
<p>Administering authorities should ensure that</p> <ul style="list-style-type: none"> • decisions are taken by persons or organisations with the skills, knowledge, advice and resources necessary to make them effectively and monitor their implementation; and • those persons or organisations have sufficient expertise to be able to evaluate and challenge the advice they receive and manage conflicts of interest. 		<p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p>
<p>The Fund has a clear scheme of delegation and arrangements for provision of management and advice. Investment decision-making is undertaken either by the Pensions Committee or delegated to the Director of Resources (S151 Officer) in consultation with the Investment Sub Group; governance oversight of these processes is provided by the Local Pension Board.</p> <p>The Pensions Committee perform duties similar to private trustees, and is comprised of elected councillors of Westmorland and Furness and Cumberland Councils and employee representatives. The Members' Allowance Scheme operates for the remuneration of the elected councillors on the Pensions Committee. Independent Investment Advisors normally attend Pensions Committee meetings.</p> <p>The dedicated Investment Sub Group has an advisory role, its purpose is to assist the Committee by carrying out investment asset class monitoring, reporting investment matters to the Committee and where appropriate giving initial consideration to investment opportunities prior to their consideration by Committee.</p> <p>The Group comprises four Members of the Pensions Committee (nominated by the Committee), the independent advisors to the Pensions Committee and the Director of Resources (S151 Officer) or deputy in their absence.</p> <p>The Pensions Committee have their skills and experience developed through training events, external seminars and investment manager presentations on a regular basis.</p> <p>The Fund has a team of professional investment and support staff, made up of Officers of the Council, who provide advice on a day-to-day basis. The Pensions Committee Chair and members can contact officers and independent advisors on an ad hoc basis as and when required.</p> <p>Expert consultants and the Fund's Actuary are also used by the Fund as required.</p> <p>The Training Policy covers the training and development of members of the Committee and ISG, the Board and the officers responsible for the management of the Fund. It ensures that:</p> <ul style="list-style-type: none"> • the Committee has the required knowledge and skills to make appropriate decisions and offer challenge; • members of the Board have the relevant knowledge and capacity to assist the Administering Authority of the Fund secure compliance with relevant 		

regulations and legislation and the requirements of The Pensions Regulator; and

- Officers are adequately trained and experienced to undertake the day to day operation and management of the Fund.

There is a forward-looking business plan and progress is regularly evaluated. This includes a three-yearly strategic investment review, following the Actuarial Valuation.

Principle 2: Clear Objectives	Not Compliant	Fully Compliant
<ul style="list-style-type: none"> • An overall investment objective(s) should be set out for the Fund that takes account of the Fund's liabilities, the potential impact on local taxpayers, the strength of the covenant for non-local authority employers, and the attitude to risk of both the administering authority and fund employers, and these should be clearly communicated to advisors and investment managers. 		✓
<p>The investment objectives and Fund attitude to risk are detailed in the Investment Strategy Statement and the Internal Control & Risk Management Policy; and the Funding Strategy Statement details the funding objectives. Both are formally reviewed at least every three years.</p> <p>In determining the Investment and Funding Strategies, the Fund, in conjunction with its Independent Advisors and Actuary, considers the Fund's liabilities, the potential impact on local taxpayers, the strength of the covenant for non-local authority employers, and the attitude to risk of both the administering authority and fund employers.</p> <p>The Fund has its own investment strategy although regard is paid to peer performance to comply with Best Value methodology. The Fund's liability profile will normally be considered in relation to its investment strategy every three years.</p> <p>All investment managers have clear written mandates, governed by the Fund's strategic objectives and Pension Investment Regulations, and are reviewed regularly by officers and the Pensions Committee.</p>		
Principle 3: Risk and Liabilities	Not Compliant	Fully Compliant
<ul style="list-style-type: none"> • In setting and reviewing their investment strategy, administering authorities should take account of the form and structure of liabilities. • These include the implications for local taxpayers, the strength of the covenant for participating employers, the risk of their default and longevity risk. 		✓ ✓

Consideration of the form and structure of the Fund's liabilities and the appropriateness of the Fund's investment strategy to meet these in the longer term is the cornerstone of both the triennial valuation of the Fund and the review of its investment strategy.

A full strategy review is undertaken every three to five years in conjunction with the actuarial valuation. The actuarial valuation considers longevity risk and the affordability of contribution rates for the employers of the Fund, taking a prudent longer-term view of funding the liabilities. This process includes consideration of the strength of employer covenants (which is also kept under less formal review in between valuations).

Principle 4: Performance Assessment	Not Compliant	Fully Compliant
<ul style="list-style-type: none"> • Arrangements should be in place for the formal measurement of the performance of the investments, investment managers and advisors. • Administering authorities should also periodically make a formal policy assessment of their own effectiveness as a decision-making body and report on this to scheme members. 		<p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p>

To ensure independence and oversight the Fund uses an external performance measurement service. Investment performance is reported to the Pensions Committee each quarter, and there are reviews with the Fund's external performance monitoring service provider.

Investment performance is reviewed at least quarterly. The Fund operates a tiered performance monitoring framework, the three tiers being officers and advisors, the Investment Sub Group (ISG), and the Pensions Committee, with governance oversight from the Local Pension Board.

Investment managers are regularly reviewed, with Officers and Advisors informing the ISG and escalating any issues as necessary.

The ISG is responsible for carrying out investment asset class monitoring; i.e. monitoring investment performance and the progress of the implementation of the investment strategy. The ISG receives a quarterly report summarising officer monitoring which sets out performance results and a broad range of metrics. Should there be any items of concern, matters are escalated to the Committee.

The Pensions Committee is responsible for strategic decision making and oversight and appoints investment managers.

The Pensions Committee members are surveyed regularly for their views on quality of advice given by the Investment Advisors. The Fund holds strategic objectives for its Investment Advisors in line with the Competition and Markets Authority (CMA's) order related to the Investment Consultancy and Fiduciary Management. The Fund has submitted annual statements to the CMA to confirm compliance with the order.

Effectiveness of Pensions Committee decisions, such as strategy and manager selection, are discussed in the Annual Report and Accounts.

Principle 5: Responsible Ownership	Not Compliant	Fully Compliant
<p>Administering authorities should:</p> <ul style="list-style-type: none"> • adopt, or ensure their investment managers adopt, the Institutional Shareholders' Committee Statement of Principles on the responsibilities of shareholders and agents. • include a statement of their policy on responsible ownership, including climate change in the Investment Strategy Statement; and • report periodically to Fund members on the discharge of such responsibilities. 		<p>✓</p> <p>✓</p> <p>✓</p>
<p>Voting at company meetings is delegated to investment managers. Reporting is required on a quarterly basis and is incorporated into the quarterly monitoring of the Fund by the Pensions Committee.</p> <p>The Financial Reporting Council's (FRC), UK Stewardship Code 2020, sets high expectations on those investing pension fund monies. It seeks to set a clear benchmark for stewardship as the responsible allocation, management and oversight of assets to create long term value and lead to sustainable benefits for the economy, the environment and society. The Fund's responsible investment policy is available on its website at:</p> <p>https://www.cumbriapensionfund.org/media/2uuf3xan/2024-03-14-ri-policy-approved-by-pensions-committee.pdf</p> <p>The Stewardship report was submitted to the FRC in October 2023 and has been assessed as meeting the requirements of the FRC's UK Stewardship Code 2020 and Cumbria Local Government Pension Scheme is listed as a signatory to 'the Code'.</p> <p>The Fund's 2022/23 Stewardship Report is published as a standalone document on the Fund's website.</p> <p>BCPP (the pooling company jointly owned by the Fund and 10 other Partner Funds which manages all of the Fund's actively managed listed equities) published a Responsible Investments and Stewardship report 2022/23:</p> <p>https://www.bordertocoast.org.uk/wp-content/uploads/2023/07/Border-to-Coast-Responsible-Investment-Stewardship-Report-22_23.pdf</p> <p>BCPP have been assessed as meeting the requirements of the FRC's UK Stewardship Code 2020 and are listed as a signatory to 'the Code'.</p> <p>All other investment managers are now either signatories to or working towards the new requirements of the Stewardship Code. The Fund expects its investment managers to incorporate ESG factors into their investment process and demonstrate the outcomes being achieved through this activity.</p> <p>The Fund is a member of the Local Authority Pension Fund Forum (LAPFF), thus demonstrating a commitment to sustainable investment and the promotion of high standards of corporate governance and responsibility.</p>		

Principle 6: Transparency and Reporting	Not Compliant	Fully Compliant
<p>Administering authorities should</p> <ul style="list-style-type: none"> • act in a transparent manner, communicating with stakeholders on issues relating to their management of investment, its governance and risks, including performance against stated objectives; and • provide regular communication to members in the form they consider most appropriate. 		<p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p>
<p>The Investment Strategy Statement (ISS) includes:</p> <ul style="list-style-type: none"> • The Fund’s Statement of Investment Beliefs (Annex A) • The Fund’s investment objective, • The Fund’s approach to investment and risks, • The types of investments and limits. <p>The ISS is publicly available on the Fund’s website.</p> <p>https://www.cumbriapensionfund.org/forms-publications/</p> <p>Investment performance is included in the Annual Report.</p> <p>The Cumbria LGPS Local Pension Board is given full access to Pensions Committee papers and are provided with briefing sessions and training presentations appropriate to their ongoing business. In addition, they are also offered the opportunity to join training sessions provided for the full Committee.</p> <p>The Cumbria Pensions Forum meets to inform and consult on wider pensions issues; the pension fund members have access to the Annual Report and Accounts, the current Fund Policy Document and public Pensions Committee papers.</p> <p>The Pensions Committee minutes and agendas are available on the Council’s website.</p> <p>The Local Pension Board minutes and agendas are available on the Council’s website.</p> <p>The Administration Strategy (including Communications Policy) sets out the Fund’s administration operations, with the policy for communication with members and access to information. This is also published on the Fund’s website. Scheme members receive an annual benefit statement ahead of the regulatory timeframe and other communication including newsletters, and briefings where appropriate.</p>		

ANNEX A – CUMBRIA LGPS INVESTMENT BELIEFS

STATEMENT OF INVESTMENT BELIEFS

OVERARCHING OBJECTIVE

To manage a sustainable and solvent Local Government pension fund on behalf of current and future members of the Fund.

BEHAVIOUR FRAMEWORK

- Communicate in a clear and constructive way;
- Act with honesty and respect for others;
- Demonstrate a positive flexible attitude;
- Take responsibility for our actions;
- Obtain and maintain the appropriate knowledge and skills to understand the investments and risks undertaken within the Fund; and
- Act in the best interest of all employers and members of the Fund.

INVESTMENT BELIEFS

1. Our investment strategy should be determined by reference to the Fund's assets, liabilities and our risk tolerances

- Our long-term primary goal is to generate returns required to fund our members' current and future pensions.
- Our aim is to maintain as stable a rate of overall employer contributions as is possible whilst securing the solvency of the Fund and its long term cost efficiency.

2. Asset allocation has the greatest impact on the overall risk and return of the Fund

- Diversification of investments reduces the volatility of asset returns and limits non market specific risk.
- Investment managers should be responsible for the identification of investment opportunities and the selection of the relevant financial assets, e.g. stocks, bonds and private assets.
- Over the long-term equities are expected to deliver a higher return than bonds albeit with a greater degree of risk and therefore volatility.
- Differences between actual and strategic asset allocation positions should be minimised by the use of cashflow and regular pragmatic rebalancing to minimise transaction costs.

3. Our pooling partner is Border to Coast Pensions Partnership ("BCPP") and we should maximise the use of their funds.

- BCPP is our pooling investment manager and where there is alignment with the Fund's investment beliefs, strategy and risk appetite (and subject to the appropriate due diligence) we intend to transition the Fund's investments to them.
- Our investment strategy should, where possible, reflect the sub-funds offered or being developed by BCPP.
- We should be involved and support BCPP in developing new sub-funds to ensure the Fund's requirements are met, and to achieve cost savings through economies of scale whilst generating the net returns required to pay members' current and future pensions.
- The Fund will monitor the investment performance of BCPP and may take appropriate action if long term performance does not meet the expectations of the Fund.

4. It is important to take a long-term perspective when considering the investment strategy, but recognise the implications of shorter-term market volatility

- The greatest risk to the fund is not short-term market volatility but the permanent loss of value.
- Benchmarks should be used as an independent measure of performance.
- Volatility represents an opportunity to the long-term investor in that it allows the investor to potentially purchase assets at a price below their long-term value.
- By the same token volatility allows profits to be taken and unexpected gains realised.
- However, it is recognised that volatility can impact on employers in the Fund (through its impact on employer contributions) and, therefore, ultimately on the Fund (as unsustainable employer contributions can have implications for the solvency of the Fund).

5. Good governance improves the quality of decision making

- Officers, Pensions Committee and Local Pension Board members should have the appropriate knowledge and skills to understand the investments and risks undertaken within the Fund.
- The foundations of good governance are clearly defined responsibilities and delegations.
- The team supporting the Pension Fund needs to be appropriately resourced, including having access to external advice, to ensure successful management of the Fund.
- Good returns, net of fees and costs, come from well-resourced and well governed Funds.

6. All investments have a degree of financial risk, but we should only accept financial risk where we have a strong belief that we will be rewarded for it.

- Active management should deliver superior risk adjusted returns over time on a net of fees basis in certain markets.
- Where it is believed that active management is not expected to add value, passive management (allowing investments to track indices rather than 'actively' choosing individual investments) provides the most cost effective means of gaining broad exposure to an asset class.
- Costs matter and need to be managed and controlled however cost alone should not drive decision-making – the key financial consideration is return net of fees and costs.

7. There are multiple risks to which the fund is exposed and those risks that are not sufficiently compensated should be mitigated, managed or avoided if possible.

- Investors should be rewarded for giving up liquidity.
- Investment risks are multi-faceted and will change over time.
- Investors should be wary of investments where the promised return is appears out of proportion to the apparent risk.
- Investors should be aware of potential misalignment of interests especially when coupled with superior access to information on the part of the investment managers and advisors.

8. As long-term investors, we believe that integrating environmental, social and corporate governance (“ESG”) considerations into the investment management process improves risk adjusted returns.

- We believe that ESG factors, such as climate change, can have a material impact on the risk profile and value of financial assets in the long term.
- We note the UK Government’s commitment to achieve net zero by 2050 and support that as a Fund.
- We note that our primary investment manager (BCPP) is committed to achieving net-zero on their investment portfolios by 2050 or sooner, recognising that achievement of this is linked to central government ambitions.
- It is recognised that scheme employers may have their own specific net- zero targets and aims but the fiduciary duty requires the Fund’s investment decisions to be in the interest of scheme members and employers.
- We do not believe that making investment decisions solely on non-financial grounds (e.g. ethical considerations) meets the Fund’s overarching primary fiduciary duty, but do consider that being a responsible investor and incorporating ESG factors into investment decisions can help to improve the long-term risk adjusted returns for investors.
- We believe that the best way to be a responsible investor and to influence policy change is not through divestment in the first instance but to influence through active engagement and encourage continuous improvement in respect of progress towards the ESG ambitions of the Fund.

- We expect our active investment managers to consider progress on shareholder engagement in their decision to continue to invest or divest in a company.
- We expect management teams and Boards of Directors to be responsive to their shareholders.
- We will lead by example by ensuring we are an active shareholder and, where appropriate, utilising the scale of collaboration with other LGPS Funds.