Section 4 Statement of Investment Policy Principles

1. Introduction

The Trustees are responsible for deciding on the investment objectives and strategy for the ESB Pension Fund (the 'Fund'). This statement sets out the main elements of their investment policy and how this is implemented. Publication of this policy is required under the Occupational Pension Schemes (Disclosure of Information) Regulations 2006.

In preparing this statement, the Trustees have consulted with ESB and professional investment advisors and considered the Pensions Authority's *Guidelines for setting investment strategy for defined benefit schemes*.

The responsibility for setting investment policy lies solely with the Trustees. The Trustees will review the statement from time to time and modify it as appropriate, with a formal review at least every three years. In addition, the Trustees will monitor compliance with this statement on an ongoing basis. The last Investment Strategy Review was finalised in 2018.

2. Investment objectives

The investment objectives of the Trustees can be summarised as follows:

- To seek sustained long-term growth, sufficient to meet the liabilities of the Fund over a prolonged period having due regard to the nature and timing of those liabilities,
- Ensure that the level of risk taken in pursuit of this growth is acceptable in the context of failing to meet the Fund's liabilities over the long term and that exposure to unrewarded risk is minimised,
- Ensure that the investments are structured and managed in a manner that provides for the cashflow requirements of the Fund to be met as they arise.

The ability of the Fund's resources, assets and future contributions, to achieve these objectives and its obligations under the Pensions Act is measured at least every three years through a formal valuation by the Scheme Actuary along with annual interim updates. The valuation also quantifies the return required from the asset portfolio over the period of the liabilities and provides the Trustees with its return benchmark. The rate of return implicit in the Actuarial Valuation at the end of 2017 was 4.0% p.a. (2.4% pa over expected inflation) and was lowered in the Interim Actuarial Valuation at the end of 2019 to 3.4% (2.05% p.a. above inflation).

3. Strategic Asset Allocation Framework

The Trustees together with the Scheme Actuary and their investment advisors have devised and adopted a framework to guide them in deciding on the most appropriate asset allocation to manage the Scheme's investments.

The plan specifically considers:

- the required level of return and resultant appropriateness of the related level of risk,
- the requirement to satisfy the Minimum Funding Standard (MFS) and associated risk reserve requirements,
- a de-risking objective of reducing the Fund's target return over time as the funding level (defined as assets divided by liabilities as measured by the economic value of the liabilities) increases. Specifically, this means a portfolio containing an increased allocation to lower risk (matching) assets over time. The general intention is not to increase investment risk as the funding level decreases.

The framework is reviewed regularly, and the most recent review determined the following Strategic Asset Allocation as being consistent with the Trustees' objectives.

Asset class	Medium Term Target Allocation (%)	Allocation Range (%)	Target De-risked Allocation
Matching/Defensive Assets			70%
Cash	6	3-10	
Bonds/LDI	12	10-70	
Performance Assets			30%
Credit	16	12-20	
Multi-Asset	15	12-20	
Property & Forestry	15	12-18	
Equities	12	7-18	
Hedge Funds	11	7-15	
Infrastructure	11	8-14	
Private Equity	2	0-4	

The table above shows the current medium-term strategic allocation and the ranges within which the Trustees believe that the immediate return objectives can be achieved. The table also shows the desired long-term allocation which the Trustees will move to as the Fund's finances and market conditions permit. The assets of the Fund will be dynamically managed to help achieve this allocation as opportunities arise. The Trustees consider matching assets as those which broadly move in line with the Scheme's liabilities. The Scheme invests in defensive assets which are held in the portfolio to protect in times of market stress or volatility.

The Trustees introduced liability driven investing (LDI) which aims to increase the hedging of certain key risks through physical and derivative investments. LDI will be increased on a phased basis based on certain indicators such as funding level, interest rates and inflation levels.

4. Environmental, Social and Governance Considerations

The Trustees believe that environmental factors, social factors and corporate governance behaviour (referred to together as 'ESG issues') are potentially financially material for the value of the Scheme's investments. The Trustees invest in a range of investment vehicles. The Trustees are satisfied that the Scheme's current funds are managed in accordance with their views on financially material factors, as set out below:

Financially Material Considerations

The Trustees understand that the method of incorporating ESG in the investment strategy and process will differ between asset classes and should be considered alongside other implementation factors. The process for incorporating ESG issues should be consistent with, and proportionate to, the rest of the investment process.

The Trustees delegate the consideration of all financially material factors in relation to determining the underlying holdings within each of the funds, including ESG factors, to the Scheme's investment managers as part of their day-to-day management of scheme assets.

Exercise of Voting Rights and Shareholder Engagement Activity

The Trustees currently adopt a policy of delegating the exercising of the rights (including voting rights) to the investment managers. The Trustees also delegate undertaking engagement activities to the investment managers.

Policy Assessment and Monitoring

The Trustees will consider ESG, voting and engagement issues when appointing and reviewing their Scheme custodian and/or investment managers (and reviewing the investment strategy) to ensure that they are appropriately taken into account given the asset class involved. The Trustees will also review aspects such as, but not limited to, longer term performance and manager incentivisation in order to ensure alignment with the Scheme's investment policy.

The Trustees meet regularly with their investment managers and consider how ESG issues are taken into account.

5. Investment Risk Management

The Trustees ensure that they understand the performance, risk and other characteristics of all asset classes and funds that the Scheme invests in. Investment guidelines and targets are agreed with external managers to take advantage of their particular strengths and to provide a complementary approach to the management of the overall Fund. These are incorporated into Investment Management Agreements (IMAs) with the managers where applicable to ensure that the assets:

- Are invested in a manner designed to ensure the security, quality and liquidity of the assets as a whole is appropriate having regard to the nature and duration of the expected liabilities of the Fund;
- Are predominantly invested in regulated markets;
- Are properly diversified in such a way as to avoid excessive reliance on any particular asset, issuer or group of undertakings and so as to avoid accumulations of risk in the portfolio as a whole;
- Include use of derivative instruments only in so far as they contribute to a reduction in investment risks or facilitate efficient portfolio management.

Performance is reviewed by the Trustees at each meeting based on reports independently collected and calculated by the Custodian. The Fund's performance is also reviewed by the Trustees relative to the long-term required return and benchmark. The Trustees also receive an independent assessment of performance, together with an analysis of the factors affecting performance, relative to the Fund's benchmark.

- *Risk controls*

The Trustees use a number of measures to control and reduce the risks associated with making investments including the following;

- *Diversification*

The Trustees aim to invest in a range of asset classes in order to achieve the required real long-term return while limiting the volatility of returns. Where practical, investments are spread geographically, across industry sectors and individual stocks.

- *Number of managers*

The assets are divided between a number of specialist investment managers. This allows for the benefits from different areas of expertise and diversifies the specific investment risk taken by the active managers. This is monitored by the Trustees, who have engaged with due diligence experts to assess individual investment manager risk.

- *Manager restrictions*

The Trustees have an Investment Management Agreement (IMA) in place with external segregated investment managers. Each IMA contains restrictions which limit the risk from each individual stock or security held and which prohibit unsuitable investment activity. Compliance with the IMA is monitored. For pooled funds, the Trustees ensure that they understand the performance, risk and other characteristics of these funds before investment.

- *Risk versus the liabilities*

The Trustees have adopted an investment strategy that they believe is capable of achieving the long-term actuarial target while being mindful of the MFS requirements. However, future returns are uncertain, and the long-term risk is that the value of the assets may not increase sufficiently over time to allow the Trustees to provide all of the intended benefits. The Trustees review this risk by monitoring the performance of the assets and the liabilities in the Triennial Actuarial Valuations, funding updates and Interim Valuations from time to time. The Trustees have adopted LDI investment strategies to increase the level of interest rate and inflation hedging relative to the Fund's liabilities. Foreign currencies over €50m are hedged in line with the active currency hedging policy range of 25% to 75%.

- *Custody*

The Trustees ensure the separation of responsibility for the safe-keeping or custody of the Fund's financial assets from its investment managers and the protection of the financial rights attaching to those assets by the employment of an independent global custodian. Custody services for pooled investment funds are provided by the appointed custodians for those funds. The global custodian is also responsible for transaction settlements, income collection, overseas tax reclamation and other administrative actions in relation to the investments.

6. Risk measurement

The Trustees understand that there is no single definitive risk measure. Therefore, they use a number of risk measures to quantify the overall level of risk.

The Trustees specifically consider the *Value at Risk (VaR)* measure. This measures the likelihood of the Fund losing more than a particular amount in a year assuming normal market conditions. An asset only VaR and Scheme level VaR measures are considered. The Trustees consider both the absolute level of the VaR and the movement over time when assessing the level of risk inherent in the Scheme.

At manager level the following are used;

- *Tracking error*, i.e. variability of return, for each manager, relative to their benchmark return (where relevant), is calculated and reviewed on a quarterly basis.

- *Information Ratio*, being the ratio of the excess return relative to the risk taken, is calculated and monitored quarterly for each manager.

The Trustees understand that the determination of risk measures (such as VaR) are based on investment models and assumptions. The model and the underlying assumptions have been explained to the Trustees and the Trustees understand the limitations of the model and the metrics which they output.

The VaR (95%) underlying the assets of the Fund based on asset allocation in Q3 2018 was calculated at €860 million, meaning that there is a 5% chance that the solvency might decrease by more than this amount over a 1 year period.

The Trustees monitor the movement of all risk metrics over time and consider their level in terms of market conditions. The absolute levels of these metrics and their general trends are included in performance reports produced for the Trustees who then discuss them with professional advisors and are considered against the risk tolerance of the Scheme.

7. Oversight and review

It is the intention of the Trustees to review this document at least every three years or sooner following any change in investment policy which is inconsistent with this statement.