Clumber Consultancy
Pension Trustees

www.clumberconsultancy.co.uk
Edwinstowe House, Edwinstowe,
Mansfield, Notts, NG21 9PR

Bennetts (Irongate) Ltd Staff Retirement & Death Benefit Scheme
Introduction

Governance requirements apply to defined contribution ("DC") pension arrangements, to help members achieve a good outcome from their pension savings. The Trustee of the Bennetts (Irongate) Ltd Staff Retirement & Death Benefit Scheme (the "Scheme") is 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 1 February 2024 to 31 January 2025.

Default Investment Arrangements
The Scheme is not used as a Qualifying Scheme for auto-enrolment and triggered into wind up on 11 January 2020, when the employer went into Liquidation. Clumber Consultancy Pension Trustees Limited were appointed by a Deed of Appointment dated 17 July 2019.

As the Principal Employer is insolvent there will be no new members joining the Scheme which is in the process of winding up. The Trustees have no recourse to a sponsoring employer to cover the costs of running the scheme and there are no unallocated assets.
Final instructions were sent to Aegon on 8 April 2025 to place all remaining members' benefits into policies in their own name. To the date of signing this statement, the Trustees have not received the requested assignment documentation to complete this and are continuing to follow up with Aegon for a resolution so that the Trust can be dissolved.

The Trustee is responsible for the Scheme's investment governance, which includes setting and monitoring the investment strategy for the Scheme, which was set up with no default arrangement. The Trustee reviews the investments available and monitors performance on an annual basis. The Trustee assesses any default fund and its performance on appointment to ensure that it provides value to the members. The fund utilised is the Aegon Mixed Fund.

Due to the expected short term of the appointment and the fact that benefits will be secured prior to the Trust being dissolved, a Statement of Investment Principles is not produced as this would not be cost effective and would represent poor value for money to the members unless it is determined that the fund is not fit for purpose. This has not been the case in respect of the Scheme.

The aims and objectives of the Mixed Fund are to outperform the ABI Mixed Investment 40-85% Shares Sector median, net of fees, by investing mainly in a mix of UK and overseas equities. The remainder will be invested in fixed interest securities (bonds) and cash.
The investment strategy has not been reviewed in respect of the period covered by this statement as the Trustee is in the process of settling the remaining benefits under the Scheme.

The Trustee regularly monitors the performance of this fund and will formally review both this and the strategy at least every three years or immediately following any significant change in investment policy or the Scheme's member profile.
The Trustees is satisfied that the funds remain appropriate whilst the winding up of the Scheme is completed.

In addition to the strategy review the Trustee also reviews the performance of the funds utilised against their aims, objectives and policies on an annual basis. This review includes an analysis of fund performance and member activity to check that the risk and return levels meet expectations. The Trustee's review that took place during the Scheme year concluded that the funds were performing broadly as expected against its aims.

Requirements for Processing Core Transactions
The Trustee has received assurance from the Scheme's administrator Aegon and has taken steps to try and ensure that there were adequate internal controls to ensure that core financial transactions relating to the Scheme were processed promptly and accurately during the Scheme Year. As the Scheme is winding up this is limited to the settlement of members benefits including payments of transfers out of the scheme and payments to members/beneficiaries. Aegon aim to complete these transactions within 10 days of receiving completed paperwork. All settlements during the year were processed promptly and efficiently.

The Trustee is therefore satisfied that over the period covered by this statement

- the administrator was operating appropriate procedures, checks and controls and operating within the agreed SLA;
- there have been no material administration errors in relation to processing core financial transactions
- all core financial transactions have been processed promptly and accurately during the Scheme year

Member Borne Charges and Transaction Costs
The Trustee is required to set out the on-going 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. The stated charges also include any costs, e.g. administration and investment costs, since members incur these costs.

The Trustee is also required to separately disclose transaction cost figures that are borne by members. In the context of this statement, the transaction costs shown are those incurred when the Scheme's fund managers buy and sell assets within investment funds. The charges and transaction costs have been supplied by Aegon.

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

Mixed Fund
The remaining funds are invested in the Mixed Fund which aims to outperform the ABI Mixed Investment 40-85% Shares Sector median, net of fees, by investing mainly in a mix of UK and overseas equities. The remainder will be invested in fixed interest securities (bonds) and cash and has an average risk rating. Over the longer term this would be expected to deliver significantly better growth prospects than a cash deposit.

Charges and Transaction Costs

Fund Name	AMC %	Additional Expenses %	Total %
Mixed	1.00	0.02	1.02

In addition, the following charges arise when a fund manager buys or sells the underlying assets of a fund.

Fund Name	Implicit Costs	Broker commission & fees	Taxes and Levies	Securities lending Fees	Total
Mixed	0.01	0.01	0.00	0.00	0.06

About the transaction costs
N/P – is not provided – this is where no transaction information is available for the fund or for an underlying fund of a blended fund
N/A – is not available – this is where either some or all of the breakdown of the transaction costs has not been supplied.

- where the transaction costs are not available for the exact scheme year, the provider has used the latest transaction costs that fund managers have provided which fall within the scheme year
- implicit costs arise due to the difference in time when a trade is instructed and when it is carried out. The movement of the market over that period can result in the implicit cost and overall transaction cost being negative.

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 Trustee has set out below illustrations of the impact of charges and transaction costs on different investment options in the Scheme. The illustrations have been prepared in accordance with the DWP's statutory guidance on "Reporting costs, charges and other information: guidance for trustees and managers of occupational pension schemes" on the projection of an example member's pension savings.

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 had to make a number of assumptions about what these might be. These are not personal illustrations, they are based on the assumptions detailed in the section 'About these illustrations'. The purpose of the example illustrations is to show how fund related costs and scheme charges can affect the overall value of the funds the scheme invests in over time.

The assumptions are explained below: 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. The transaction cost figures used in the illustration are based on those provided by the managers.

The illustration is shown for the mixed fund since this is the arrangement with the remaining members invested in it.

	Mixed Fund	
Years	Before Charges	After All charges
1	26,875	26,576
3	27,668	26,753
5	28,483	26,932
6	28,900	27,022

About these illustrations
For these illustrations we have assumed:
- the starting age is 54 and the retirement age is 60
- no future contributions are made
- projected pension fund values are shown in today's terms, and do not need to be reduced further for inflation. Inflation is assumed to be 2.5% each year
- The starting pension fund value in the first year is £26,487.70

- Each illustration has been produced assuming that this is the only fund invested in and that all transaction costs and scheme charges are deducted from that fund
- The growth rate of the Mixed Fund is assumed to be 4%. This is for illustrative purposes only and is not guaranteed. The investment growth achieved may be more or less than this and may vary depending upon the type of fund.

If the growth rate used is:

- The same as the rate of inflation, this reduces the growth rate, after making an allowance for inflation to 0%
- Less than the rate of inflation, this produces a negative growth rate after making an allowance for inflation

The value of the funds as at 1 February 2024 was £155,313 and at 31 January 2025 was £174,552.82.

Value for Members Assessment

The Trustee is required to assess the extent to which member borne charges and transaction costs represent good value for members. It is difficult to give a precise legal definition of "good value", but the Trustee considers that it broadly means that the combination of costs and the quality of what is provided in return for those costs is appropriate for the Scheme membership as a whole. The Trustee reviews all member-borne charges (including transaction costs where available) on appointment and annually, with the aim of ensuring that members are obtaining value for money given the circumstances of the Scheme. The Trustee notes that value for money does not necessarily mean the lowest fee, and the overall quality of the service received has also been considered in this assessment.

The Trustee's assessment included a review of the performance of the Scheme's investment funds (after all charges) in the context of their investment objectives.

The returns on the investment funds members can choose during the period covered by this statement have been consistent with their stated investment objectives.
In carrying out the assessment, the Trustee also considers the other benefits members receive from the Scheme, which include

- the oversight and governance of the Trustee, including ensuring the Scheme is compliant with relevant legislation, such as the charge cap, and holding regular meetings to monitor the Scheme and address any material issues that may impact members;
- the range of investment options and strategies;
- the quality of communications delivered to members;
- the quality of support services
- and the efficiency of administration processes and the extent to which the administrator met or exceeded its service level standards for the Scheme year.

As detailed in the earlier section covering processing of financial transactions, the Trustee is comfortable with the quality and efficiency of the administration processes. Overall, the Trustee believes that members of the Scheme are receiving reasonable value for money for the charges and cost that they incur as the Scheme is in the final stages of wind up.

Trustee Knowledge and Understanding

The Scheme's Trustee is required to maintain appropriate levels of knowledge and understanding, that together with any advice received enables them to run the Scheme effectively and to provide appropriate services to pension schemes as part of its day to day business.
The Trustee has a working knowledge of the Trust Deed and Rules and other Scheme documents and as part of their day to day business activities deals with matters that both strengthen their knowledge of and understanding of the Scheme as well as pension and trust law.
Staff dealing with the Scheme have completed or are working towards completion of the TPR Trustee Toolkit.

The Trustee considers training requirements to identify any knowledge gaps. The Trustee is familiar with and have access to copies of the current Scheme governing documentation that along with their experience and any training or personal study undertaken means that the Trustee believes that they are well placed to exercise their function as Trustee of the Scheme properly and effectively.

DARREN TOMS

Signed by the Chair of Trustees of the Bennetts (Irongate) Ltd Staff Retirement & Death Benefit Scheme
18 August 2025