

Associated Press Defined Contribution Retirement Plan

Chair's Annual Governance Statement

Regulations effective from 6th April 2015 (updated 6th April 2018) require trustees to prepare a statement showing how they have met certain minimum governance standards in relation to defined contribution benefits. These standards cover four principal areas relating to the Plan's defined contribution benefits, namely: the default investment arrangement, core financial transactions, value from member borne deductions and the trustees' knowledge, understanding and resources.

This statement, covering the period 1 January 2020 to 31 December 2020, describes how the Trustees have governed the Plan during the year and, in particular, the steps they have taken during the year to improve the likelihood of members experiencing a good outcome for life after work.

The statement covers four principal areas:

1. Investment with particular focus on the Plan's default investment arrangements.
2. Internal controls, with particular focus on the processing of core financial transactions.
3. Value, with particular focus on charges and transaction costs deducted from members' funds.
4. The knowledge and resources available to the Trustees, including how the Trustees maintained the statutory levels of knowledge and understanding to govern the Plan and how these help the Trustees ensure that the Plan is governed effectively.

This statement will be published on <https://vfm.aviva.co.uk/associated-press/> and will be signposted in the annual benefit statements issued to members.

The default investment option

The Trustees are responsible for setting the Plan's investment strategy and for appointing investment managers to carry out that strategy. They must also establish a default investment option ("default") for members who do not select their own investment options from the fund range that is available.

The Trustees' Statement of Investment Principles ('SIP'), which includes a statement of principles in relation to the Plan's default investment arrangement, has been prepared for the Plan under Section 35 of the Pensions Act 1995 (the '1995 Act') and Regulation 2 and Regulation 2A of the Occupational Pension Schemes (Investment) Regulations 2005 (the 'Investment Regulations').

This covers the Trustees' aims and objectives in relation to the default as well as their policies in relation to matters such as risk and diversification. It also states why they believe the default has been designed in members' best interests. A copy of the SIP, dated August 2020 is included as Appendix A and is also available on request. Further, the latest SIP can now be accessed via <https://vfm.aviva.co.uk/associated-press/>, the availability of which is also signposted on members' annual benefit statements.

The Trustees are committed to keeping all investment options under regular review to ensure they remain appropriate, based on their understanding of the likely requirements of the membership. The current review of the default strategy commenced in November 2020 and is due to be completed in June 2021.

As part of this review the Trustees will consider the Plan's membership profile to provide a deeper understanding of the membership's characteristics, investment choices and retirement activity. In addition, the Trustees are also looking at wider industry trends in respect of retirement activity and trends, with a focus on Plan-specific behaviour and the performance of the default against their stated aims and objectives in the SIP. This will enable the Trustees to determine the appropriateness of the current strategy and whether it remains suitable for the Plan and members.

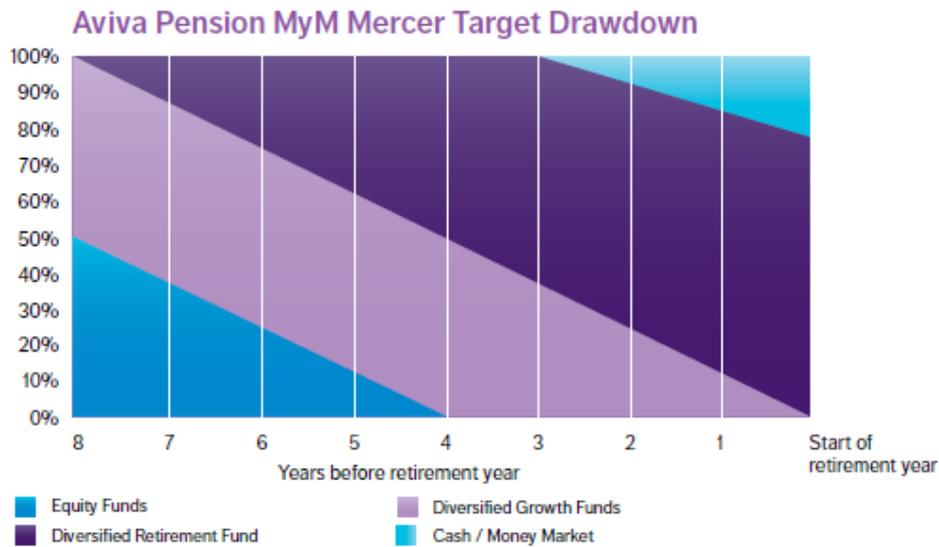
The current default investment strategy is a lifestyle strategy targeting income drawdown at retirement.

The investment strategy is built around three groups of members:

- **"Do it for me"** - these members are offered a diversified, growth orientated fund in the savings phase and a specific set of Target Retirement Funds targeting the retirement destination selected by the Trustees, which targets drawdown, (the default arrangement);

- **“Help me do it”** – in addition to the default Target Retirement Funds, members can also select alternative Target Retirement Funds which target other retirement destinations or mix and match between them, i.e. annuity purchase or cash.
- **“Leave me to it”** –members also have complete freedom to select and build their own portfolio from a range of funds selected by the Trustees. This includes a number of Mercer building block funds and external funds that are highly rated by Mercer.

The default fund for the Plan invests in the AV MyM Mercer Growth/Balanced Risk Fund in the growth phase; the period up to eight years prior to retirement. At eight years from retirement, investments are gradually de-risked into the relevant AV MyM Mercer Target Drawdown Funds. In the year of the member’s retirement, the investment split of the default fund is 75% AV MyM Mercer Diversified Retirement Fund and 25% AV MyM Mercer Cash. The default has been designed this way to reduce member’s exposure to investment risk as they approach retirement.



There are a further two lifestyle strategies available to members targeting cash or annuity purchase at the members target retirement age. Members are able to invest in more than one lifestyle strategy and move between them if their plans for retirement change.

In selecting the default, the Trustees believe that:

- The growth phase structure is designed to provide growth with some downside protection and protection against inflation erosion.
- The strategy appropriately seeks to reduce investment risk as the member approaches retirement.
- Based on their understanding of the membership, a strategy that targets income drawdown and a tax-free cash lump sum (up to 25% of a members’ pot) at retirement is likely to meet a typical member’s requirements for income in retirement.

Over the year, the Trustees and their advisers reviewed the performance of all the funds available to members, including the default fund on a quarterly basis. The Mercer Workplace Savings (“MWS”) team provide the Trustees with quarterly investment reports that include the funds’ net performance against their benchmarks, changes to the Mercer’s manager ratings and manager updates. These reports are reviewed by the Trustees and any concerns would be raised with the investment manager via Mercer.

During the volatility experienced by members in the year as a result of COVID-19, the Trustees closely monitored funds with additional reporting provided by the MWS team and Aviva and the Trustees remained confident that the overall strategy and processes were robust and fit for purpose.

During the year the Trustees introduced an additional fund to the self-select fund range available to members; the Sustainable Global Equity Fund. This is a passive fund focused on companies with sustainable returns, strong ESG characteristics and attractive valuations.

Requirements for processing financial transactions

As required by the Administration Regulations, the Trustees must ensure that core financial transactions are processed promptly and accurately. Core financial transactions are (broadly):

- Investment of contributions made to the Plan by members and their employer(s);
- Transfers into and out of the Plan of assets relating to members;
- Switches of members' investments between different funds within the Plan; and
- Payments from the Plan to or in respect of members (e.g. payment of death benefits and on retirement).

The Trustees regularly monitor the Plan's administration and management, including the prompt and accurate processing of financial transactions.

The Trustees have delegated the administration of Plan member records to Aviva. The Trustees have agreed minimum timescales with Aviva for processing requests, including core financial functions, which are well within any applicable statutory timescales. Mercer provides ongoing monitoring and assessment of Aviva's operational service levels. On a monthly basis, Mercer monitors service levels delivered to the Plan and to their other clients, ensuring Aviva are held accountable to these. The following Service Level Agreements (SLAs) have been agreed:

SLA	Description	Target Service Level %
2 working days	Access to Policy Documentation	97%
2 working days	Contribution Processing	100%
3 working days	Investment Transactions	97%
5 working days	General Enquiries	97%
5 working days	Payments Out	97%
5 working days	Payments In	97%

Aviva records all member transactions and benefit processing activities in a work management system which assigns the relevant timescale to the task.

From January 2020 to 31 December 2020, an overall service level of 99.36% was achieved by Aviva.

During the year the one remaining member invested with Standard Life in the Pension With Profits One 2006 fund, had the policy assigned to their own name on 8 July 2020. There were no core financial transactions in respect of this member whilst they were still a member of the Plan in the reporting year.

The processes adopted by Aviva to help meet the SLA's include:

- Timeliness of transactions monitored and reported (escalating/reallocating resources if necessary).
- Straight through processing for contribution payments - automated system (validations built in)
- Manual processes require a separate processor and authoriser (segregation inbuilt into system)
- Quality audit checks are undertaken on a sample of processes throughout the year.
- Unit reconciliation between investment and administration systems undertaken daily and are checked and approved weekly (by platform provider)
- Payments checked and approved independently by one or more individuals (depending on value).

Administration reports produced by Aviva are reviewed quarterly by the Trustees and there were no concerns during the period being reported. The Trustees also monitor the accuracy of the Plan's common and conditional data. A summary report is received from the Plan administrator annually.

As a wider review of the Plan administrator in general, the Trustees receive an assurance report on the administrator's internal controls. The latest report received was for the period to 31 December 2019 (published in May 2020) and noted the Independent Service Auditor's opinion that, in all material aspects, its controls were suitably designed and those tested operated effectively.

The Schedule of Contributions sets out timescales for the Company to remit monthly contributions to the Plan by the 19th of the following month after deduction (i.e. contributions deducted in January must be paid across to Aviva by 19th February at the latest). However, agreed practice provides for payment of contributions in advance of these timescales, usually by the end of the month in which the contributions are deducted. The deduction and payment of contributions is reviewed by the Company. The Plan Auditor spot checks that contributions are paid in accordance with the Schedule of Contributions.

The Trustees are confident that the administrator processed the core financial transactions promptly and accurately during the period.

Charges and transaction costs

As required by the Administration Regulations, the Trustees are required to report on the charges and transactions costs for the investments used in the default and their assessment on the extent to which the charges and costs represent good value for members.

Explicit charges known as the Total Expense Ratio (TER) consist principally of the manager's annual charge for managing and operating a fund, but also includes the costs for other services paid for by the fund, such as the legal costs, registration fees and custodian fees. However, they exclude other costs that are also member borne and which can therefore have a negative effect on investment performance such as transaction costs and interest on borrowings.

Transaction costs are the expenses associated with a member trading in and out of a fund as well as the investment manager trading a fund's underlying securities, including commissions and stamp duty.

The available transaction costs provided by the Plan's investment managers have been reported separately to the TERs in the table below. The section 'Further information about previous default and investment strategy' at the end of the Statement details the funds held previously with Standard Life.

The TERs and transaction costs for the lifestyle strategies are shown in the table below. The TER for the de-risking phases for the lifestyle strategies will vary depending on the time from retirement.

The Trustees can confirm that the default remains within the charge cap of 0.75% p.a.

Lifestyles			
Investment Strategy	Aviva MyM Mercer Funds	TER* (%p.a.)	Transaction Cost (%)***
Growth phase**	Mercer Growth/Balanced Risk	0.45	0.0794
	Target Drawdown 2020	0.50	0.1061
AV MyM Mercer Target Drawdown**	Target Drawdown 2021	0.50	0.0906
	Target Drawdown 2022	0.51	0.0952
	Target Drawdown 2023	0.51	0.0989
	Target Drawdown 2024	0.50	0.1019
	Target Drawdown 2025	0.49	0.0973
	Target Drawdown 2026	0.48	0.0928
	Target Drawdown 2027	0.46	0.0882
	Target Drawdown 2028	0.46	0.0837
	Drawdown Diversified Retirement	0.47	0.1161
	AV MyM Mercer Target Annuity	Target Annuity 2020	0.38
Target Annuity 2021		0.38	0.0000
Target Annuity 2022		0.38	0.0000
Target Annuity 2023		0.40	0.0083
Target Annuity 2024		0.41	0.0183
Target Annuity 2025		0.42	0.0307
Target Annuity 2026		0.43	0.0432
Target Annuity 2027		0.45	0.0557
Target Annuity 2028		0.45	0.0681
Annuity Retirement		0.36	0.0000

Source Aviva, as at 31 December 2020.

* The TER includes the annual management charge and the additional fund expenses as at 31 December 2020.

** Default investment option.

*** Due to the way in which transaction costs are calculated, they can be negative or positive in nature; a negative figure is effectively a gain from trading activity, whilst a positive figure is effectively a cost from trading activity. Some of the transaction costs provided are estimated, as some of the underlying information is not yet available.

Lifestyles			
Investment Strategy	Aviva MyM Mercer Funds	TER* (%p.a.)	Transaction Cost (%)***
AV MyM Mercer Target Cash	Target Cash 2020	0.35	0.0121
	Target Cash 2021	0.35	0.0122
	Target Cash 2022	0.36	0.0133
	Target Cash 2023	0.38	0.0145
	Target Cash 2024	0.39	0.0156
	Target Cash 2025	0.41	0.0180
	Target Cash 2026	0.42	0.0337
	Target Cash 2027	0.44	0.0494
	Target Cash 2028	0.44	0.0652
	Cash Retirement	0.33	0.0120
Self-select investment options			
Risk Profiled Funds		TER* (% p.a.)	Transaction Costs (%)***
AV MyM Mercer Defensive/Lower Risk		0.42	0.0113
AV MyM Mercer Moderate Growth/Moderate Risk		0.46	0.0501
AV MyM Mercer Growth/Balanced Risk		0.45	0.0795
AV MyM Mercer High Growth/Higher Risk		0.46	0.0650
Building Block Funds		TER* (% p.a.)	Transaction Costs (%)***
Aviva MyM Mercer Passive Overseas Equity		0.29	0.0081
Aviva MyM Mercer Diversified Growth		0.51	0.2066
Aviva MyM Mercer Cash		0.28	0.0120
Aviva MyM Mercer Pre-Retirement		0.32	0.0000
Aviva MyM Mercer Diversified Retirement		0.47	0.1161
Aviva MyM Mercer Passive UK Equity		0.29	0.0044
Aviva MyM Mercer Passive Over 5 Year Index-Linked Gilt		0.29	0.0000
Aviva MyM Mercer Passive UK Corporate Bond		0.30	0.0000
Aviva MyM Mercer Passive Over 15 year Gilt		0.28	0.0000
Aviva MyM Mercer Passive Shariah		0.55	0.0274
Aviva MyM L&G UK Ethical		0.40	0.0109
Av MyM Mercer Passive Sustainable Global Equity		0.32	****

Source Aviva, as at 31 December 2020.

* The TER includes the annual management charge and the additional fund expenses as at 31 December 2020.

** Default investment option.

*** Due to the way in which transaction costs are calculated, they can be negative or positive in nature; a negative figure is effectively a gain from trading activity, whilst a positive figure is effectively a cost from trading activity. Some of the transaction costs provided are estimated, as some of the underlying information is not yet available.

**** Underlying data is not available, however there are no members are currently invested in this fund.

Fund	TER (% p.a.)	Transaction Costs (%)
SL Pension With Profits One 2006 Fund	0.20 ^(a)	0.0409

Source: Standard Life, as at 31 December 2019.

This policy was assigned in the members own name in July 2020 and therefore cost and charges information to the end of the reporting year is not available.

^(a) Whilst there is no explicit fee in relation to the SL Pension With Profits One 2006 Fund, this is the deductions for guarantees assumption used in members statutory money purchase illustrations.

Where the underlying transaction cost information is not available, the Trustees are working with their advisors to obtain this. This information will continue to be requested from Aviva until the underlying managers are in a position to provide the transaction costs. This has been included as a regular item under matters arising (reviewed quarterly).

Illustration of the effect of transaction costs and charges on members' benefits

Using the charges and transaction cost data provided by Aviva and in accordance with regulation 23(1)(ca) of the Administration Regulations, as inserted by the 2018 Regulations, Aviva have assisted the Trustees with preparing an illustration detailing the impact of the costs and charges typically paid by a member of the Plan on their retirement savings pot. The statutory guidance provided has been considered when providing these examples.

The illustrations, prepared by Aviva has taken into account the following elements:

- Savings pot size;
- Contributions;
- Real terms investment return gross of costs and charges;
- Adjustment for the effect of costs and charges; and
- Time.

The illustration includes all member costs, including the TER, transaction costs and inflation. It is important to note that the values shown are estimates and are not guaranteed. The term of investment has been based on the youngest member of the Plan. These show how different costs and charges can impact the pension pot over certain periods of time, based on a selection of investment funds. Table 1 shows typical funds for the Plan. Table 2 shows funds with different growth rate assumptions and charges.

Table 1

Illustration of effect of cost and charges for typical funds within your scheme – The Associated Press Defined Contribution Retirement Plan										
	Av MyM Mercer Growth / Balanced Risk		Av MyM Mercer Passive UK Corporate Bond		Av MyM Mercer Passive Overseas Equity		Av MyM Mercer Passive UK Equity		Av MyM Mercer Growth / Balanced Risk without ret de-risking	
	Assumed growth rate 3.6%		Assumed growth rate 2%		Assumed growth rate 4.5%		Assumed growth rate 4.5%		Assumed growth rate 3.6%	
	Assumed costs and charges 0.62%		Assumed costs and charges 0.3%		Assumed costs and charges 0.29%		Assumed costs and charges 0.29%		Assumed costs and charges 0.62%	
At end of year	Projected value assuming no charges are taken	Projected value after costs and charges are taken	Projected value assuming no charges are taken	Projected value after costs and charges are taken	Projected value assuming no charges are taken	Projected value after costs and charges are taken	Projected value assuming no charges are taken	Projected value after costs and charges are taken	Projected value assuming no charges are taken	Projected value after costs and charges are taken
1	£1,190	£1,190	£1,180	£1,180	£1,200	£1,200	£1,200	£1,200	£1,190	£1,190
2	£2,400	£2,380	£2,360	£2,350	£2,420	£2,410	£2,420	£2,410	£2,400	£2,380
3	£3,620	£3,580	£3,530	£3,520	£3,670	£3,650	£3,670	£3,650	£3,620	£3,580
4	£4,850	£4,790	£4,700	£4,670	£4,940	£4,910	£4,940	£4,910	£4,850	£4,790
5	£6,100	£6,000	£5,860	£5,820	£6,230	£6,190	£6,230	£6,190	£6,100	£6,000
10	£12,500	£12,100	£11,600	£11,400	£13,100	£12,900	£13,100	£12,900	£12,500	£12,100
15	£19,300	£18,400	£17,200	£16,800	£20,700	£20,200	£20,700	£20,200	£19,300	£18,400
20	£26,500	£24,800	£22,600	£21,900	£29,000	£28,100	£29,000	£28,100	£26,500	£24,800
25	£34,000	£31,400	£27,900	£26,900	£38,200	£36,700	£38,200	£36,700	£34,000	£31,400
30	£42,000	£38,100	£33,100	£31,700	£48,300	£46,000	£48,300	£46,000	£42,000	£38,100
35	£50,400	£45,000	£38,200	£36,300	£59,400	£56,100	£59,400	£56,200	£50,400	£45,000
40	£59,200	£52,000	£43,100	£40,700	£71,700	£67,100	£71,700	£67,200	£59,200	£52,000
45	£68,600	£59,200	£47,900	£44,900	£85,200	£79,000	£85,200	£79,100	£68,600	£59,200
50	£78,400	£66,500	£52,600	£49,000	£100,000	£91,900	£100,000	£92,100	£78,400	£66,500

Table 2

Illustration of effect of costs and charges for funds with different growth rates and charges within your scheme – The Associated Press Defined Contribution Retirement Plan								
	Av MyM Mercer Cash Retirement		Av MyM Mercer Passive Over 15 Year Gilt		Av MyM Legal & General (PMC) Ethical UK Equity Index		Av MyM Mercer Diversified Growth	
	Assumed growth rate 0.5%		Assumed growth rate 1.5%		Assumed growth rate 4.5%		Assumed growth rate 3.6%	
	Assumed costs and charges 0.34%		Assumed costs and charges 0.25%		Assumed costs and charges 0.41%		Assumed costs and charges 0.7%	
At end of year	Projected value assuming no charges are taken	Projected value after costs and charges are taken	Projected value assuming no charges are taken	Projected value after costs and charges are taken	Projected value assuming no charges are taken	Projected value after costs and charges are taken	Projected value assuming no charges are taken	Projected value after costs and charges are taken
1	£1,170	£1,170	£1,180	£1,180	£1,200	£1,200	£1,190	£1,190
2	£2,320	£2,320	£2,350	£2,340	£2,420	£2,410	£2,400	£2,380
3	£3,450	£3,440	£3,510	£3,490	£3,670	£3,640	£3,620	£3,580
4	£4,560	£4,530	£4,650	£4,630	£4,940	£4,900	£4,850	£4,780
5	£5,640	£5,600	£5,790	£5,750	£6,230	£6,170	£6,100	£5,990
10	£10,800	£10,600	£11,300	£11,200	£13,100	£12,800	£12,500	£12,100
15	£15,400	£15,000	£16,500	£16,200	£20,700	£20,000	£19,300	£18,300
20	£19,600	£19,000	£21,500	£21,000	£29,000	£27,800	£26,500	£24,600
25	£23,400	£22,500	£26,300	£25,500	£38,200	£36,100	£34,000	£31,100
30	£26,900	£25,600	£30,800	£29,800	£48,300	£45,100	£42,000	£37,600
35	£30,000	£28,400	£35,100	£33,700	£59,400	£54,900	£50,400	£44,300
40	£32,800	£30,900	£39,200	£37,500	£71,700	£65,400	£59,200	£51,100
45	£35,400	£33,200	£43,200	£41,000	£85,200	£76,700	£68,600	£58,100
50	£37,700	£35,100	£46,900	£44,300	£100,000	£89,000	£78,400	£65,100

Notes:

1. Assuming a starting pension pot of £0. £100 monthly contributions are assumed to be paid, increasing in line with assumed earnings inflation of 2.5% each year.
2. The figures illustrate the pension pot value in ‘today’s money’ which means they take inflation into account by discounting values at 2.5% a year. Seeing the figures in this way shows you what they could be worth today. It’s important to note that inflation reduces the worth of all savings and investments. The effect of this is shown in the illustration and could mean the fund may reduce as well as grow in ‘today’s money’.
3. Transaction costs may not have been included where data was not available from the fund managers (in relation to the cash fund).

Value for Members

When assessing the charges and transaction costs which are payable by members, the Trustees are required to consider the extent to which these represent good value for members.

The Trustees with support from their advisers, Mercer Ltd, have undertaken a value for members assessment in May 2021 for the year to 31 December 2020.

There is no legal definition of “good value”, so the process of determining good value is a subjective one. “Value” is not a straightforward concept to quantify and can be open to broad interpretation. In undertaking the assessment, the Trustees recognised that the Plan is a bundled arrangement and considered the quality of services provided by Aviva including fund management, administration and communications support.

The value for members assessment also examines the current investment management charges relative to standard institutional fees for equivalent size mandates, Mercer Manager Research Ratings and historical performance.

The Trustees concluded that the Plan's overall benefits, options and services represent **good** value for money in comparison to the costs payable by members. The reasons underpinning this conclusion include:

- Charges on funds have been assessed by our advisors as comparing favourably with those of funds with similar asset sizes;
- Charges for the Plan's default investment arrangement are significantly below the charge cap of 0.75% per annum;
- The funds used by the Plan are highly rated by Mercer Ltd as having good prospects of achieving their risk and return objectives;
- The performance of the Plan's funds over the 1 year to 31st December 2020 compare favourably relative to the benchmark set by the Trustees;
- Transaction costs have been provided for all of the funds invested in by members. Where underlying transaction cost information was unavailable, the Trustees will work with Aviva to obtain this information to include in the next Chair's Statement. Currently, industry wide reporting on transaction costs is not at a level to allow a meaningful comparison, however once available the Trustees will look to include this in their value for money assessment.
- Through their membership in the Plan, members get the benefit of (amongst other things):
 - Ongoing oversight and review of the default investment option and the DC fund range;
 - The Trustees' and Company's governance of the services;
 - Efficiency of administration services in relation to communications (including face to face presentations (when permitted) as well as webinars) and general member services.

Additionally, the Company pays for all advisory costs associated with operating the Plan, which further enhances the value that members receive.

Trustee knowledge and understanding

In accordance with sections 247 and 248 of the Pensions Act 2004, the Trustees are required to maintain an appropriate level of knowledge and understanding that, together with professional advice available to them, enables them to properly exercise their functions and duties in relation to the Plan.

The Trustees are conversant with, and have demonstrated a working knowledge of, the Plan Documents such as Trust Deed and Rules, Statement of Investment Principles as well as policies and documents setting out the Trustees' compliance as part of the general running of the Plan in the period to 31 December 2020.

During the year, the Trustees undertook a number of activities that involved giving detailed consideration to pensions and trust law, the Plan's governing documents and Investment Principles. This allowed them to exercise their knowledge and understanding and to further strengthen their capabilities. These included:

- Reviewing and updating the Statement of Investment Principles in light of new legislative requirements from 1 October 2020.
- Detailed consideration of Legal advice on pensions and tax law obtained in relation to the implications of Brexit for cross border arrangements and assignment of members.
- Reviewing the default arrangement with consideration of legal requirements.
- Consideration of the reporting requirements under the Competitions Market Authority order.
- Examining a number of Plan documents and member communications having regard to pensions law and the Trust Deed and Rules, including their policies on Internal Dispute Resolution Process (IDRP), Member Nominated Trustee process and retirement flexibilities.

The Trustees receive professional advice from Mercer and Baker Mackenzie to support them in reviewing the performance of the Plan and in governing the Plan in line with the Trust Deed and Rules. The advice received along with their own experience allows them to properly exercise their function as Trustees. If there are any ambiguities over the interpretation of the Rules legal advice is sought from Baker Mackenzie.

There are documented processes in place for appointing both the Chair and new Trustees and whilst there have been no changes to the Trustee board during the year, the induction process for new Trustees is as follows:

- Newly appointed individuals to have completed the Pensions Regulator's Trustee toolkit within six months of initial appointment;
- Supplemented with targeted individual training based on analysis of learning needs;
- Facilitate familiarisation with the Plan, stakeholders, advisers and providers and working methods.

The Trustees discussed and considered their training requirements for 2021 in their November 2020 meeting using the training schedule already in place and upcoming activities to help identify any knowledge gaps and as a result agreed that additional training on pension scams, cyber security and Brexit considerations should be undertaken in 2021.

During the course of the Plan year the Trustees have:

- Undertaken targeted ongoing training both as a group within the quarterly meetings and individually to keep abreast of relevant developments and in line with the Training Plan. These include:
 - Refresher on tax allowances and reporting deadlines.
 - The Stewardship Code.
 - Updated guidance from the Pensions Regulator in light of volatility in markets (as a result of COVID-19)
 - Changes to the Tapered Annual Allowance.
 - Refresher on the requirements for reviewing the default investment strategy.
- Briefings on forthcoming changes to Pensions law and their possible impact on the Plan, for example: new requirements on the publication and content of SIPs from October 2020, 2020 reporting and disclosure requirements and the increased focus on Responsible Investment by consumers.
- Maintained individual and group training logs.
- Regularly reviewed their training needs by considering the training schedule of upcoming training at each meeting and updating as appropriate.

The Trustees also review and assess, on an ongoing basis (at least annually), whether the systems, processes and controls across key governance functions are consistent with those set out in the Pensions Regulator's Code of Practice 13. The last full review was undertaken in November 2020.

In addition, as at 31 December 2020, the Trustees have all completed the Pension Regulator's Trustee Toolkit other than the new optional pension scams module which is due to be addressed in 2021 as part of their training plan.

Chair's declaration

This statement has been prepared in accordance with Regulation 23 of the Occupational Pension Schemes (Scheme Administration) Regulations 1996 as amended by the Occupational Pension Schemes (Charges and Governance) 2015 (together 'the Regulations') and I confirm that the above statement has been produced by the Trustees of the Associated Press Defined Contribution Plan.

Signed by Sue Gilkey Chair of the Associated Press Defined Contribution Retirement Plan on 27 July 2021.

Appendix A: Statement of Investment Principles