

For customers

# Aegon Master Trust Statement of Investment Principles

Please bear in mind that the value of investments may go down as well as up and that investors may get back less than they invest. Past performance is not a guide to future performance. To find out more about the funds mentioned in this document, including fund-specific risks, please read the fund factsheets, which can be found on the website at [www.aegon.co.uk/funds](http://www.aegon.co.uk/funds).

Any charts are for illustrative purposes only.

Please see glossary of terms at the start of this document if you're unsure of any of the terms used. You should seek financial advice if you're not sure whether an investment or product is right for you.

**Adopted by the Trustees on 23 April 2024**

## Document history

- **September 2019 / September 2020** The Trustees updated their Statement of Investment Principles (the SIP) in September 2019 and again in September 2020 to incorporate new default fund detail, the Trustee's further thinking on sustainability and some policy changes and new legal requirements which took effect from 1 October 2020.
- **September 2021** A further update in September 2021 added additional detail on Employer Bespoke Notional Sections, detailing how the Trustees consider and monitor individual employer requests to make available funds outside the standard fund range. That revision also reflected the move by one Bespoke Notional Section to use the Aegon BlackRock LifePath standard default. Importantly the revision added information about the Trustees' environmental, social and governance (ESG) beliefs.
- **September 2022** The SIP was updated following the addition of three funds to the standard self-select fund range, together with an update on the Sun Life of Canada 2015 Employee Pension Plan default arrangements; and to clarify the Trustees would review annually how asset managers align with, and reflect, the Trustees' stewardship policies.
- **May 2023** A further revision, adopted in May 2023, reflected the introduction of the New Core Range. At the time of this update, the New Core Range was available only to new employers joining the Scheme. It was noted that members within existing notional sections (including where applicable, Bespoke Notional Sections) would gain access to the New Core Range later.
- **September 2023** This update to the SIP, adopted in 14 September 2023, reflects the availability of the AMT Fund Range (previously referred to as the New Core Range) to members within existing notional sections of the Scheme, replacing the previous self-select fund range (the Old Core Range).

Where a fund from the Old Core Range is being withdrawn the Trustees are in the process of moving Members with holdings in that fund, to either a new fund in the AMT Fund Range selected by the member or to the relevant Aegon BlackRock LifePath fund. The Trustees plan to complete the transfer of members to the AMT Fund Range by the end of 2023. Once the transfer is complete any references to the Old Core Range in the SIP can be disregarded.

This revision to the SIP also updates the Bespoke Notional Section information to detail those that have moved to the standard Scheme fund options (and so are no longer Bespoke Notional Sections) and those Bespoke Notional Sections that have made changes to the funds available to their Members.

**April 2024** This update removes reference to the Old Core Range that is no longer available to members following the full implementation of the AMT Fund Range, which finalised in October 2023. Appendix 2 has also been updated to reflect the Bespoke Notional Sections that have moved to the standard AMT Fund Range.

This revision of the SIP also includes the addition of [a policy on the investment in illiquid assets](#), adopted by the Trustees in April 2024.

## Glossary

Throughout this document we have sought to explain any technical terms in the context they are used. This glossary is provided as a reference to explain many of these terms in everyday language. Please note the descriptions used in this glossary are not to be read as defined terms within the Scheme Rules. Where the definitions differ, the definition contained in the Scheme Rules will apply.

<b>Actively managed funds</b>	A fund which has an asset manager or team making decisions on the underlying asset allocation. Actively managed funds aim to produce returns which exceed a specific benchmark / index, although there's no guarantee that they will do so. Actively managed funds require a greater level of manual intervention, so costs are usually higher than for passively managed funds.
<b>Asset allocation</b>	Asset allocation is the process of dividing investments among different asset classes, such as equities, bonds and cash, to balance risk and reward.
<b>Asset classes</b>	Types of investment, includes equities, often split by global region, bonds, commercial property and cash.
<b>Bonds</b>	Loans or securities which can be issued by governments, companies or local authorities to raise money. They entitle the holder to regular interest and repayment when the loan matures.
<b>Annuity</b>	This is an option at retirement, the client can choose to purchase an annuity to the value of their pension pot which then pays a guaranteed regular income payment for life, or for a defined period.
<b>Cash</b>	Cash held in a fund can include a mix of sterling cash, securities of deposit, short-term bonds, and money market instruments. These investments are generally considered to be less risky than other types of investment, but also have lower growth potential, and returns may be outstripped by rising inflation. In a low interest rate environment cash funds may generate a negative return after charges.
<b>Commercial property (real estate)</b>	Such as offices, retail and industrial property, or shares in property companies. Returns come from a mix of rental income and, hopefully, rising property values. Managers of commercial property investments may at times delay payment to investors if market conditions make it hard to sell properties at a fair price.
<b>ESG</b>	ESG stands for environmental, social, and governance and is an evaluation of those factors for investment purposes. Investors use these factors to identify material risks and growth opportunities.  <b>Environmental</b> – climate change, energy efficiency, water use and conservation, deforestation, waste and pollution, and use of natural resources. <b>Social</b> – human rights and labour standards, product safety and reliability, diversity and inclusion policies, nutrition and health, workplace safety, workplace benefits, supply chain and sourcing. <b>Governance</b> – Board independence and diversity, shareholders' rights, executive pay, ownership and control, accounting integrity and tax transparency.

<b>Equities</b>	Also known as company shares, which mean you're buying part ownership of that company. Returns come from a mixture of dividends and capital growth if the company is successful. Equities have traditionally offered better long-term growth potential than other asset classes, but they are also more likely to fall significantly in value.
<b>Illiquid Assets</b>	<p>Illiquid assets are those that cannot easily or quickly be sold or exchanged for cash and include any such assets held in a collective investment scheme.</p> <p>Some of the most prominent investments in this category include property, infrastructure, unlisted equity and credit and hedge funds.</p>
<b>Income drawdown</b>	This is a retirement strategy option where the member withdraws some of their money from a pension savings account to support their retirement whilst leaving other pension savings invested.
<b>Notional section</b>	As the Scheme is not formally segregated, different employer and member groupings are referred to as notional sections.
<b>Passively managed funds</b>	Passively managed funds aim to produce returns broadly in line with the index they track (before charges) by investing in the same investments, in the same proportions, as that index. This means less manual intervention, so charges are usually lower than for actively managed funds.

## 1. Introduction to this document

This document is the SIP of the Aegon Master Trust (the 'Scheme') prepared by the Trustees of the Scheme (the 'Trustees'). It enables the Trustees to meet the requirements of:

- the Pensions Act 1995 as amended by the Pensions Act 2004; and
- the Occupational Pension Schemes (Investment) Regulations 2005 and subsequent amendments.

Prior to updating this SIP, the Trustees have obtained and considered independent written advice from Isio, the Trustees' investment advisers. Isio is authorised and regulated by the Financial Conduct Authority (FCA) for a range of investment business activities. The Trustees have also consulted with Aegon as Sponsoring Employer and service provider in the preparation of this SIP.

The SIP provides details of the fund range including default arrangements, for Members who haven't chosen where to invest their pension savings, and other investment options and the investment policies which guide the way in which Members' investments are made and managed. These policies apply across all of the Scheme's investments (unless otherwise stated) and are intended to ensure that the assets are invested in the best interests of Members (and beneficiaries).

The Scheme is a 'wholly insured bundled' arrangement which means that all the relevant administration, other services and investment funds are provided by Aegon. The Scheme is looked after by Trustees who are ultimately responsible for the governance, administration, and investment functions of the Scheme, which includes arranging for the Scheme assets to be invested in the best interests of its Members (and beneficiaries). The Scheme invests in 'pooled' funds and, therefore, the Trustees do not have a direct relationship with the underlying asset manager(s) but they have a contractual relationship with Aegon and use this relationship to influence the stewardship and investment activities of the underlying asset manager(s). This is usual for these types of arrangement. The Scheme Trustees have produced this SIP, which formally sets out the Trustees' investment policies, beliefs, and objectives and how they review and monitor the Scheme's investment strategy and performance. This is a legal requirement.

The SIP is reviewed at least every three years or when a significant change to the Scheme's investment strategy or fund range design has been made or when the Trustees consider that a review is needed for other reasons. The default arrangement strategies will also be reviewed after any significant change in the demographic profile of relevant Members.

Members can obtain a copy of this document either at [www.aegon.co.uk/workplace/employers/targetplan/master-trust.html](http://www.aegon.co.uk/workplace/employers/targetplan/master-trust.html) or on request.

## 2. Choosing investments

The Trustees believe that good investment governance can deliver better outcomes for Members. Having a set of clearly defined investment beliefs is part of this. Investment beliefs are guiding principles which inform the investment strategy, design of the default arrangements and the number and type of other investment options the Trustees make available to Members.

### **The Trustees' investment beliefs:**

- i. Default arrangements should reduce Members' exposure to investment risk throughout their lifetime, as well as reflect their likely pension benefit choices.
- ii. The fund range should meet the needs of the target market and it should be presented in a simple way that helps to combat common behavioural biases.
- iii. Other self-select investment options should be offered to meet the differing risk and goal preferences of Members.
- iv. As long-term investors, the Trustees believe the fund range should, where possible, align with the Trustees' responsible investment beliefs (set out in section 8).

## **Investment objectives**

In keeping with the investment beliefs (set out above), the Trustees have designed their investment strategy to provide a suitable range of funds to Members so they can save for retirement. The fund range includes investments suitable to Members of different ages, with different retirement benefit plans and different attitudes to risk. In designing the fund range, the Trustees have taken advice from their investment advisers and, where appropriate, input from specialists employed by the Scheme's insurer (Aegon). The Trustees are aware some Members will not want to make decisions about where to save their contributions, whilst others will want to exercise differing amounts of control. The Trustees have designed the fund range with the intention to best meet these diverse needs, as well as to cater for Members wanting to take income drawdown in retirement.

Details of the fund range (default arrangements and other investment options made available) are included in the Appendices to this document. The Trustees are also aware that some participating employers wish to agree a different range of investment fund options and/or a different default fund for their employees. Where that is the case, the Trustees and the participating employer in question take appropriate investment advice to create a bespoke arrangement for such employees. Further details of bespoke arrangements are outlined in the Appendix 2, and full details of these arrangements are given to the employees directly.

### **3. Balance of different kinds of investments**

The Trustees recognise that risks are inherent in retirement savings. The Trustees have to strike a balance between taking sufficient investment risk to achieve good investment returns while ensuring that default arrangements (in particular) are not exposed to excessive risk when Members are about to retire.

The Trustees have created the fund range to enable Members to gain access to a range of asset classes and markets taking account of a number of different risks. The fund range includes choices suitable for Members of different ages and with different retirement benefit plans. The fund range is closely aligned to the Trustees' responsible investment beliefs and so integrates ESG considerations. In deciding the types of assets to include the Trustees consider investment returns net of charges.

The Trustees consider the merits of both active and passive management strategies and may select different approaches for different asset classes. The Scheme is permitted to invest in a wide range of asset classes including equities (both in the UK and overseas), bonds (both in the UK and overseas), cash, commercial property, alternatives, and specialist funds (including ethical and Sharia).

Members' retirement savings are held by the Trustees within two investment-linked insurance policies provided by Scottish Equitable plc (trading as Aegon). This provides Members with access to a range of investment funds.

### **4. Policy on the investment in illiquid assets**

The Trustees recognise that adding exposure to certain specialist asset classes (for example, illiquid assets) within a default fund has potential to improve member outcomes and enhance risk adjusted returns over the medium to long term. However, this potential must be considered within the context of other factors (such as cost and complexity) to protect Member outcomes.

The Trustees are committed to working alongside Aegon and fund manager partners, to understand how we can improve long term value through new asset classes. Further analysis is now being undertaken before committing to investment in illiquid assets. The Trustees hope to update this position within the next 12 months.

### **5. Investment risks**

The Scheme is a 'defined contribution' pension scheme – also known as a 'money purchase' scheme. Broadly, the value of a Member's retirement benefits in this type of scheme is based on the amount of money that the Member has in the Scheme at the point of taking their benefits.

The Member bears the investment risk and the risk of not accumulating sufficient savings to meet their retirement needs. The amount of money saved will depend primarily on:

- how much they and/or their employer has contributed into the Scheme;
- the performance of the funds in which the Member's savings are invested;
- how long the Member has contributed to the Scheme; and
- fees deducted from a Member's investments.

In designing the range of funds for the Scheme, the Trustees carefully consider the period during which Members are contributing to and growing their pension savings (known as accumulation), the period when Members are taking money out of their pension savings (known as decumulation) and financially material risks.

A financially material risk is one which could have a significant effect (positive or negative) on Members' retirement savings over the period a particular investment fund is used by Members and can include ESG risks such as (but not limited to) climate change factors. The Trustees characterise and consider such factors in terms of the sustainability of the Scheme's investments.

The key investment risks are (in alphabetical order):

**Asset manager** – selecting a fund from an asset manager who could make poor investment decisions which then impacts Members is a considerable risk. For the Scheme's main investment choices, the Trustees have decided to include funds which significantly reduce this risk by limiting the way in which the asset manager invests Members' savings. These are typically referred to as 'index-tracking funds' or 'passive' investments.

An index-tracking fund will generally aim to replicate the performance of the applicable market index by having the same proportion of shares, bonds, or other assets as the index it is aiming to track. Such a strategy relies less on asset manager skill to achieve the return benchmark and so is less dependent on asset manager discretion.

There is no guarantee that any fund within the Scheme fund range (standard and/or bespoke) will achieve its long-term objective. The Trustees monitor the funds and asset managers to seek to minimise this risk.

**Credit** – in accordance with the Scheme insurance policies, Aegon may invest and reinvest each investment fund into external insurance funds and other collective investment schemes, subject to regulations and the fund's investment objectives. Many of the funds are protected by Aegon in the event of default, but for some funds the Member bears the risk of default (failure to perform a contractual obligation) by a third-party insurer, external fund manager, depositary or trustee of an underlying fund or collective investment scheme. Members can find a list of funds protected by Aegon on the TargetPlan Member website. In the event of default by Aegon, the Scheme is protected by the Financial Services Compensation Scheme.

**Currency** – Funds held by Members may invest in assets denominated in a foreign currency and so are exposed to exchange rate fluctuations that could adversely impact the value of those assets. Where appropriate, the underlying asset manager may choose to reduce this risk by hedging back a proportion of the exposure to UK Pounds (Sterling). Hedging is a financial strategy seeking to protect investment portfolios from the risk of adverse currency movements that could lead to the loss of value. Hedging can create either an obligation or option to exchange one currency for another at a set rate at a future date – this reduces the potential for a change in exchange rates to affect the return on the investment.

**Diversification** – keeping all your eggs in one basket or holding a limited number of different investments increases the risk of losing money if one particular investment underperforms. Funds holding a greater number of different assets or types of investments help to increase diversification and therefore reduce risk. The Trustees have designed the fund range to provide appropriate levels of diversification in each of the fund options.

**Inflation** – the value of a basket of goods will increase in the future because of inflation, therefore the performance of Member funds must generally keep pace with this increase, to protect what is known as the real value of Member savings. The Trustees have defined their investment choices to provide

options for Members looking to grow the value of their savings in real terms. Rising inflation affects purchasing power by decreasing the number of goods or services you can purchase with your money.

### Interest rate changes

- **Fall in interest rates** - there is a risk that a decline in interest rates could materially reduce the amount of income which can be generated from a given level of capital. Such a risk can occur suddenly and potentially near the point of retirement. It can be partially mitigated through the Lifepath Retirement Fund which changes its asset allocation in the 10 years prior to retirement by investing in government bonds and other fixed interest securities designed to match annuity rates.
- **Rise in interest rates** - there is a risk that an increase in interest rates can in turn trigger a fall in bond prices, particularly in bonds that have a longer duration to maturity. This can reduce the money available in the Scheme to fund a Member's retirement. Members closer to retirement are generally invested in a higher proportion of corporate and government bonds. This risk is partially mitigated through fixed income allocation being diversified across a mix of corporate and government bonds, some with lower durations to reduce the impact of rising interest rates.

**Liquidity** – some investments such as property or shares in private companies cannot easily or quickly be sold or exchanged for cash, and therefore it can take some time to get money returned or transferred to another fund. The Trustees have limited this risk by offering funds which are generally more liquid rather than illiquid.

**Pension conversion** – for Members nearing their retirement, the potential impact of poor performance is significantly increased as they have less time to make up for losses. The Aegon BlackRock LifePath target date funds automatically manage Members' savings to limit this potential risk as they near retirement, based on the Members' target retirement date.

**Performance volatility** – the performance of the funds will at different points go up and will also go down; referred to as volatility. Those funds, which have a chance of earning more money for Members over the longer term, are likely to see greater volatility over short periods.

The Trustees have provided a range of carefully considered choices which balance the needs of investment growth and risk. The Aegon BlackRock LifePath target date funds available in the Scheme and a number of other funds are designed to mitigate this risk through diversification across a wide range of asset classes. The Aegon BlackRock LifePath target date funds automatically manage Members' savings to limit this potential risk as they near retirement, based on the Members' target retirement date.

### Responsible investment

- **Environment** - Environmental risk **includes the consideration of how** investments **impact** the physical environment, such as utilisation of natural resources and the effect of **business** operations on the environment. Neglecting to consider the effects of investment policies and practices on the environment as well as changes in regulation or the low-carbon transition may expose Members to higher levels of financial risk.
- **Social** - Social risk describes an organisation's ability to fulfil its obligation and commitments towards its internal and external stakeholders. These groups include employees, customers, vendors and suppliers, the nearby community, and possibly the global community. Failing to address the changing social needs of society in and out of the workplace can result in organisational failure and increasing costs of doing business, or potential declining sales and eventually, negative returns for Members. Today there's a heightened expectation of businesses being required to step-up and meet the ever-expanding social needs of customers, employees, investors, and stakeholders.



- **Governance** - Numerous academic studies have shown that companies with weak or declining governance typically underperform better governed business in financial terms. Governance risk includes the risks related to an organisation's ethical and legal management, the transparency and accuracy of company performance, and involvement in other initiatives important to stakeholders. Governance risk is owned by the board of directors and senior management, and cuts across many layers of an organization. At the top, the board of directors and senior management set the tone and policies that permeate the organisation. Corporate shareholders have the right to hold the company accountable for governance issues.

**Transaction costs** – Managers of funds could trade too frequently and so increase the transaction costs paid by Members. The Trustees monitor the overall level of costs (including transaction costs which measure the cost of portfolio turnover) to ensure Members are receiving good value and assess the relative return on investments from each fund net of all costs.

## 6 Expected return on investments

The Trustees take into consideration the expected risk and return (net of charges and inflation) of the Scheme investment options. The Trustees are advised by their investment adviser, Isio, on these matters. However, the day-to-day selection of investments in each fund is delegated to the relevant asset manager.

Within the fund objective, each fund offered has a benchmark for performance. There is no guarantee that any fund will achieve its long-term objective or meet/exceed its benchmark.

## 7. Realisation of investments

The asset managers have responsibility for buying and selling investments. The Trustees are aware of the risks of illiquidity and how these risks may be mitigated. The Trustees note that asset managers may have an ability to suspend redemptions and new investments in certain circumstances, for example in commercial property funds, and these suspensions can go on for a period of time.

A fund is suspended to protect investors. When investors sell their holdings in a fund, the asset manager sells assets in the fund to raise cash. If the asset managers can't sell assets quickly enough to raise money for all the investors selling their units, trading in the fund is suspended. With property (real estate) funds, selling the underlying assets (typically commercial property) can take time – this is described as liquidity risk. If many investors wish to withdraw their investments at the same time, this can lead to a property funds being suspended. This is to give the asset manager time to sell underlying assets and return money to investors.

If a fund is suspended, the Trustees will communicate with Members and outline alternative fund options for Members to continue making contributions and taking withdrawals.

## 8. Financially material considerations

The Trustees have considered how financially material considerations, including ESG factors, are taken into account in the selection, retention, realisation, and monitoring of the investment options, considered over the time horizon applicable to Members invested in those funds.

As the Scheme invests via pooled funds, the Trustees have delegated responsibility for the selection, retention and realisation of investments to Aegon, within the parameters set by these Investment Principles. The Trustees' approach to managing financially material considerations is reflected in the range of pooled funds available in the Scheme.

The Trustees do not have an explicit policy for non-financial considerations; however they can take account of such considerations and will also consider any views expressed to them by Members. The Trustees welcome feedback about the fund range and specific investment concerns, although they are not bound to implement those views.

## 9. Responsible investment

Responsible investment is an umbrella term and includes how an asset manager considers ESG risks and opportunities and the approach taken to stewardship including voting and engagement.

Responsible investment is often referred to as the consideration of ESG factors.

### Responsible investment beliefs

The Trustees have agreed their responsible investment beliefs. These are:

<b>Risk Management</b>	The Trustees believe that active consideration of ESG issues will lead to improved outcomes for members and better management of risk. The Trustees believe that a broad approach to ESG integration is important, considering all three components of ESG investing. Climate change, in particular, presents significant risks, as well as opportunities to invest in the transition to a low-carbon and climate-resilient future.
<b>Investment Approach</b>	ESG issues which are considered to be financially material should be integrated into the overall management of the standard default options.  The standard self-select fund range should include specialist funds which invest in line with sustainable and / or responsible investment themes, taking into account member preferences where relevant.  The Trustees will only select asset managers that integrate ESG issues within their overall decision making. A key aspect is to ensure that each asset manager supports our climate ambition and net zero commitment.
<b>Reporting &amp; monitoring</b>	The Trustees will regularly monitor key ESG metrics within the Scheme's investment portfolio, to understand the impact of their investments and to assess progress over time.
<b>Voting &amp; engagement</b>	The Trustees recognise that active engagement with investee companies, including thoughtful voting, is key to driving change. They will therefore monitor the asset managers' voting and stewardship engagement activity to assess improvements over time.
<b>Collaboration</b>	The Trustees expect asset managers to engage actively with other market participants to raise ESG investment standards and facilitate best practices. They also expect their chosen asset managers to be signatories to the United Nations Principles for Responsible Investment (UNPRI) and the UK Stewardship Code as minimum, and that they are be able to demonstrate ongoing progress in raising ESG standards.

### Engagement and stewardship

The Trustees bear the ultimate responsibility for ensuring effective governance and management of responsible investment-related risks and opportunities. This is particularly important given that the Scheme assets are managed by third-party asset managers with their own proprietary approaches and strategies, including responsible investment. Effective oversight, dialogue, and monitoring of those asset managers is therefore a key tool for the Trustees' responsible investment approach.

Views on ESG issues are constantly evolving, and the Trustees will work to understand the areas that are most material to Members. The Trustees expect asset managers to regularly review and assess the effectiveness of their own stewardship policy. Where improvements have been made, the Trustees require that these are disclosed.

The Trustees expect asset managers to be fully transparent with their stewardship responsibilities and report on these at least annually, which supports the Trustees in determining the extent to which asset managers' stewardship policies have been followed throughout the year.

All asset managers are expected to respond to an annual responsible investment due diligence questionnaire. This helps the Trustees ensure minimum responsible investment requirements are met. This insight, and insight gathered through various member surveys, help inform topics for engagement with asset managers throughout the year.

The Trustees will not appoint asset managers who fail to integrate responsible investment principles into their overall decision-making processes. Those that the Trustees do appoint are required to report on their voting and engagement activities. The Trustees have a voting and engagement approach with asset managers. This highlights the Trustees' priority engagement themes, sets engagement principles for asset managers and outlines an 'expressions of wish' approach to voting. Through expressions of wish, the Trustees are able to set non-binding requests for key asset managers in pooled funds to vote a certain way on "most significant" votes. Factors informing the Trustee's definition of most significant votes include, but are not limited to: votes in the Scheme's largest holdings, votes aligned to the Trustee's priority engagement themes and votes which have the potential to substantially impact financial or stewardship outcomes.

## **10. Monitoring**

There is no set duration for arrangements with asset managers, they can be replaced at any time. To ensure the Scheme's asset managers comply with the Trustees' policies, the Trustees closely monitor and assess the asset managers. The Trustees believe that they have appropriate governing documentation setting clear expectations to the asset managers and regular monitoring of performance and processes sufficient to incentivise asset managers to make decisions that align with the Trustees' policies. The Trustees take action where a fund does not meet expectations – initially placing them on a watch list and agreeing a remedial plan with the asset manager. Ultimately the Trustees may replace the asset manager. When assessing an asset managers' performance, the focus is on longer-term outcomes, and the Trustees would not expect to terminate an asset managers' appointment based purely on short-term performance. However, an asset manager's appointment could be terminated within a shorter timeframe due to other factors such as a significant change to its business structure or investment team.

The Trustees review the performance of each fund in the range offered against the stated performance objective for that fund. The Trustees receive quarterly reports to facilitate this. Quarterly three-year rolling performance and investment risk is typically assessed against each fund's objectives and relevant benchmark. The choice of three-year rolling performance as a measure is to ensure asset managers are encouraged to focus on the medium to long-term financial and non-financial performance of the funds they manage.

Additionally, there is a fuller review annually to ensure asset managers have implemented their mandate correctly and comply with the policies set by the Trustees. This annual review includes a review of all fund costs, including transaction costs by individual fund, to ensure that each fund delivers value for money after all costs. As part of the review, the Trustees monitor the fee income of asset managers to ensure these are in line with good industry practice and are set at levels that allow the investments to offer value for money. The review covers asset allocation, to understand diversification and includes assessment of each fund against its index where applicable. The annual review includes an assessment of the fund's value for Members.

## **11. Bespoke Notional Sections**

A Bespoke Notional Section is where an employer makes funds available to their Members that differ from the standard Scheme offering. This can include if the employer opts for an alternative default strategy to the standard Scheme default strategy and/or provides their Members with a self-select range that differs from the standard self-select fund range.

## **New Bespoke Notional Sections**

The Trustees recognise that some participating employers, working with their own advisers, wish to access a wider range of investment funds than are available in the AMT Fund Range or who wish to use a different default arrangement. For those employers, the Trustees will consider a Bespoke Notional Section to achieve the best outcome for Members taking account of the employer's proposals.

When a new Bespoke Notional Section is proposed, the Trustees will take written independent investment advice on the appropriateness of any proposed new funds, be they default or self-select. That advice will include an assessment of value for money to Members. The assessment will further consider whether there are existing funds in the AMT Fund Range that are comparative to those being proposed.

The Trustees will consider the investment risks and objectives identified in this SIP for each new Bespoke Notional Section.

## **All Bespoke Notional Sections**

Investments within Bespoke Notional Sections must align with the Trustees' responsible investment beliefs and any underlying Investment Manager must comply with both the UNPRI and the Financial Reporting Council Stewardship Code.

All Bespoke Notional Section arrangements will be subject to ongoing performance review and the same standards of fund governance monitoring as the standard Scheme fund range. The Trustees require quarterly reports on how funds performed.

Bespoke Notional Sections will be reviewed formally by the Trustees every three years (or more regularly as provided for elsewhere in this SIP), supported by independent investment advisers and Aegon's Investment Governance Team, to ensure the funds which have been made available to members of any Bespoke Notional Sections remain appropriate.

More information on the Bespoke Notional Sections can be found in Appendix 2 to this SIP.

Signed on behalf of the Trustees of the Aegon Master Trust:

Position: Chair of the Aegon Master Trust Board

Name: Ian Pittaway for and on behalf of Independent Trustee Limited

Date: 23 April 2024

## Appendix 1 to SIP – Standard default designs and self-select fund range

The Trustees have designed a fund range for the Scheme which they believe is appropriate and, when doing so, have taken advice from their investment adviser (Isio) and, where appropriate, input from specialists employed by the Scheme's insurer (Aegon).

The Trustees are aware that some Members may not want to make decisions about where to invest their pension savings, whilst others will want to exercise differing amounts of control. The Trustees have selected the default fund options to best meet these differing needs, as well as to cater for Members wanting to take income drawdown in retirement.

Where the Trustees have agreed to a Bespoke Notional Section, details of these arrangements are outlined in Appendix 2, and full details of these arrangements are given to the relevant Members. Appendix 2 also shows former Bespoke Notional Sections that have moved to use the standard default and AMT Fund Range, since the last update to the SIP.

### Default Investment Option

The Trustees have selected Aegon BlackRock LifePath Flexi as the standard default investment option for Members, which is used as the default option by participating employers not wishing to implement an alternative default. The standard default option is compliant with the charge cap.

### Aegon BlackRock LifePath target date series

The Scheme's LifePath funds are pre-designed investment strategies that have an asset allocation based on the year that the Member expects to retire.

The Aegon BlackRock LifePath funds are designed to offer the potential for growth with a focus on managing investment risk at each stage of the journey towards retirement. This is achieved by utilising an investment strategy that gradually alters the asset allocation as Members near their target retirement date.

When the Member is younger, they are likely to have lower savings but a higher remaining earning potential, so the fund invests in riskier, growth focused asset classes. As the Member gets closer to the point at which savings are accessed, they are likely to have higher savings but a lower remaining earning potential, so the LifePath fund gradually switches into investments that aim to grow savings on a lower-risk basis. In the final 10 years prior to the Member's target retirement date, the aim is to invest in assets that are suited to the target outcome of the fund and reduce uncertainty as Members approach their retirement date. Although the actual value of the Member's pot cannot be guaranteed at any time, the asset allocation is designed to take age-appropriate risk throughout their investment journey. As the asset allocation changes, so does the risk profile of the relevant Aegon BlackRock LifePath fund (with risk, in this context, referring to the potential for a fall in value of a fund).

### Aegon BlackRock LifePath fund choices

There are three LifePath versions:

- **Aegon BlackRock LifePath Flexi fund:** for Members planning to leave their savings invested and draw income, and/or withdraw ad-hoc amounts from their savings.
- **Aegon BlackRock LifePath Retirement fund:** for those planning to buy an annuity at their target retirement date.
- **Aegon BlackRock LifePath Capital fund:** for those planning to take their savings as a one-off cash sum.

Up until 10 years prior to the member's target retirement date, monies will be invested in the same assets regardless of which of the three Aegon BlackRock LifePath strategies they are invested in. From 10 years prior to the Member's target retirement date, the asset allocation of the three funds begins to differ as they target different retirement outcomes.

This is illustrated by the charts below where the horizontal axis represents the number of years until the Member's target retirement date. The percentage allocation to each type of asset is shown on the left-hand scale and Members can follow how this changes as they get closer to their target retirement date.

If a Member (or their employer on their behalf) does not make an investment choice, their pension savings will be automatically invested (defaulted) into the Aegon BlackRock LifePath Flexi fund, with a target date which most closely matches their own target retirement date.

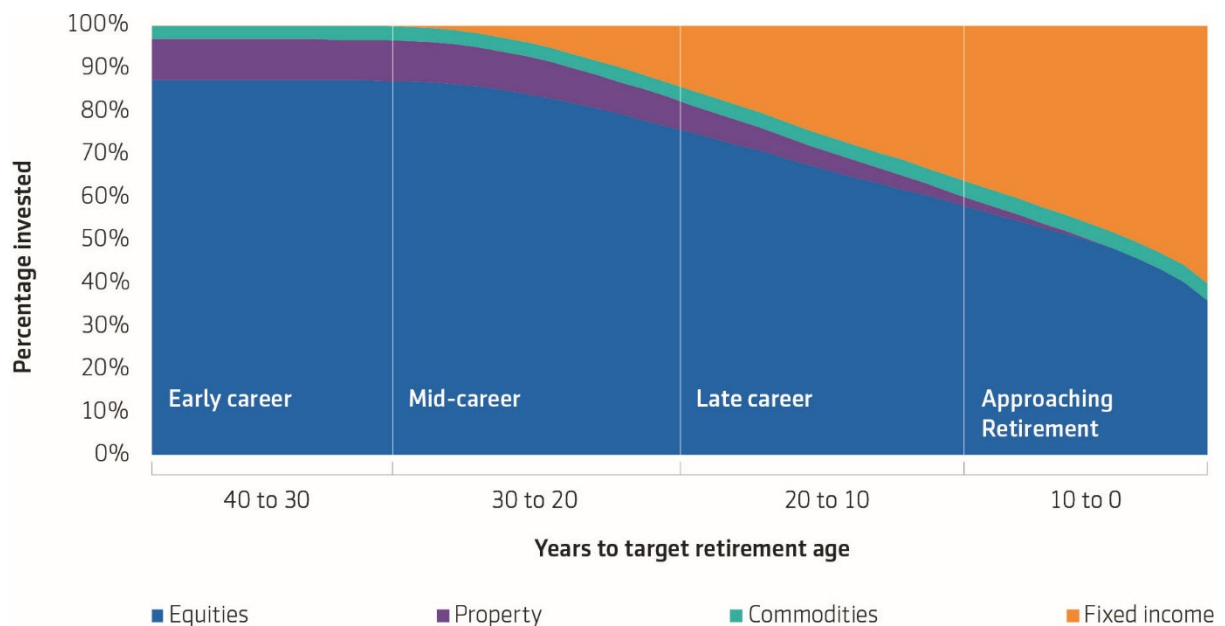
### Aegon BlackRock LifePath Flexi

The Aegon BlackRock LifePath Flexi fund utilises an age-appropriate investment strategy that gradually alters the asset allocation as Members near their target retirement to approximately 40% global equities and 60% fixed income by the Member's target retirement date.

When the fund reaches its target date, Members will be invested directly in an undated Aegon BlackRock LifePath Flexi fund which maintains the same 40%/60% asset allocation mix into retirement to support the flexibility for members to leave their savings invested and draw income, and/or withdraw ad-hoc one-off amounts from their savings.

At the point of retirement (far right in the chart below) Aegon BlackRock LifePath Flexi is designed for Members who wish to stay invested post-retirement and draw down an income from the fund. Exchange rate movements can affect the value of investments in foreign currencies; hence the fund hedges the majority of foreign currency exposure as the fund diversifies towards its asset allocation at retirement.

### Aegon BlackRock LifePath Flexi Fund

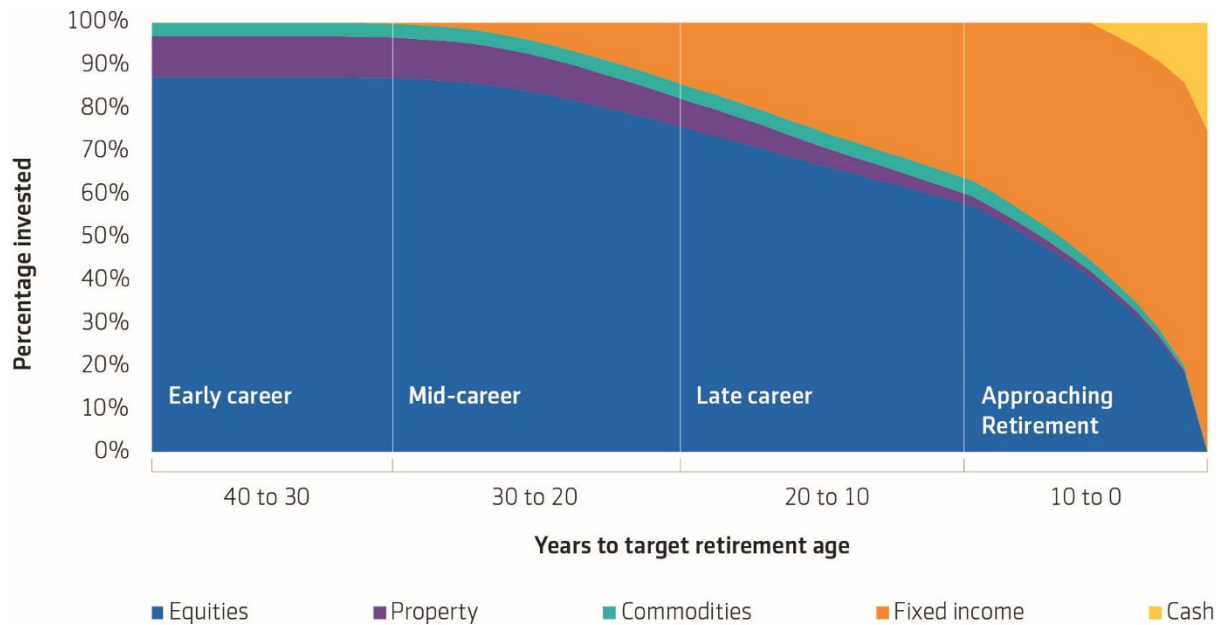


### Aegon BlackRock LifePath Retirement

The Aegon BlackRock LifePath Retirement fund aims to track immediate annuity rates and is 75% invested in the BlackRock Pre-Retirement fund at the Member's target retirement date. That fund invests mainly in UK government bonds (gilts), UK corporate bonds, and other fixed income securities and aims to produce a return in excess of a benchmark designed to reflect long-term changes in annuity prices.

When each Aegon BlackRock LifePath Retirement fund reaches its target date, it will also have a 25% allocation to cash-like investments as it is anticipated that many Members selecting this option will want to take advantage of current regulations allowing individuals to withdraw up to 25% of their savings tax free.

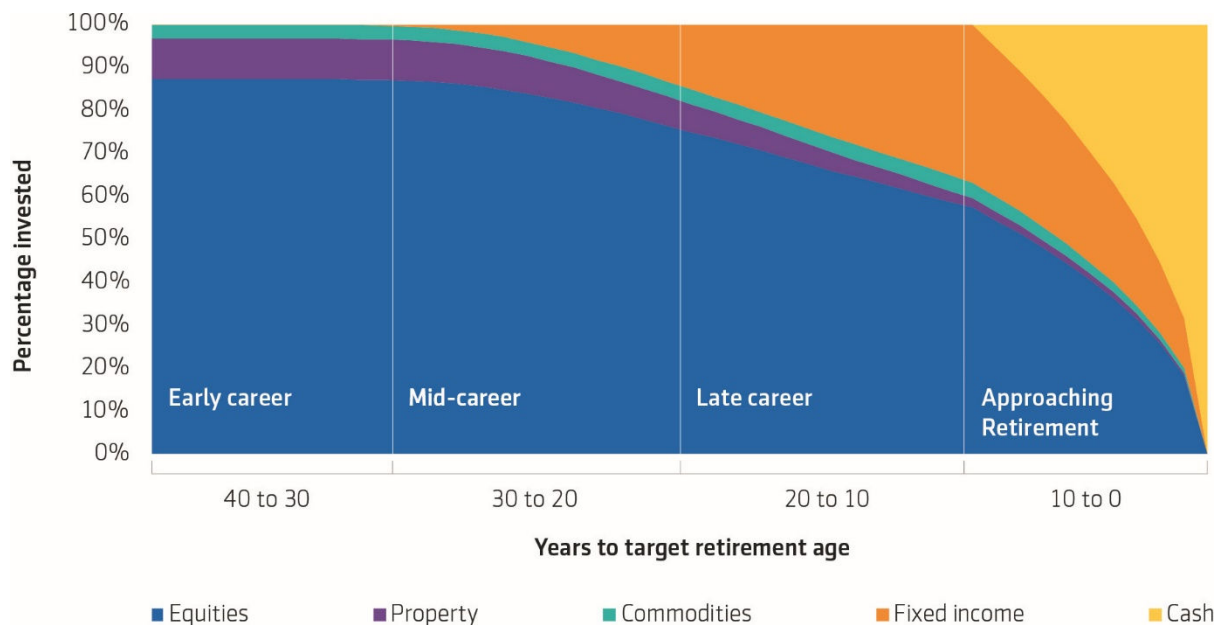
### Aegon BlackRock LifePath Retirement Fund



### Aegon BlackRock LifePath Capital

The LifePath Capital fund is designed to move towards cash-like investments that aim to produce a return in excess of its benchmark, principally from a portfolio of sterling-denominated cash, deposits and money-market instruments. When each LifePath Capital fund reaches its target date, Members remain invested in 100% cash-like investments.

### Aegon BlackRock LifePath Capital Fund



## Aegon Cash (AMT) Fund

For Members who select their own funds, there are circumstances in which the Aegon Cash (AMT) Fund (Cash Fund) temporarily becomes a Member's default fund. Such circumstances are infrequent and typically triggered by a fund being closed/suspended to new monies and withdrawals.

In this situation, Members' future contributions are re-directed to the Cash Fund. The Trustees and Aegon write to affected Members informing them of the fund closure/suspension and that contributions have been re-directed, inviting them to make an alternative fund selection.

While the Trustees do not believe the Cash Fund is suitable as a long-term pension investment given limited growth potential and exposure to inflation risk, the Trustees believe that the Cash Fund is a suitable default solution for investors in the short-term. This belief is based on, amongst other things, the following factors:

- it is a temporary solution offering a low-risk investment to give Members time to make an alternative fund selection; and
- the Trustees and Aegon communicate with impacted Members who can make an alternative fund selection.

## The AMT Fund Range

The Trustees have designed the AMT Fund Range to include passively managed and actively managed funds across the risk spectrum, covering all major asset classes. This aims to provide Members with the flexibility to construct their own investment strategies and is likely to cater for a variety of individual needs.

The fund range has been designed in line with the Trustees' responsible investment beliefs, to allow Members to select funds based on their own sustainable investing preferences and to address the risks and opportunities arising from climate change and other ESG factors. The AMT Fund Range includes funds that use exclusions to screen out investments that are particularly harmful to the environment and/or society. Typically, these screens cover the more obvious areas such as revenue from fossil fuels, but also exclude the likes of controversial weapons manufacturers, human rights violators and tobacco companies. The AMT Fund Range also includes several specialised funds, which focus more directly on sustainable investing and addressing climate issues.

Following market research conducted by Aegon, the Trustees have also considered Members' understanding of investment terminology to create a simplified and consistent naming structure across the range.

Each fund in the AMT Fund Range has fund objectives that define the manner in which they invest. The funds each utilise third party asset managers selected by the Trustees to deliver the fund objectives. If the Trustees believe there is a more appropriate underlying fund/s available to deliver to these objectives, they may replace the underlying fund/s and/or third-party asset manager.

## Fund selection

The Trustees have selected the standard Aegon BlackRock LifePath strategy, the alternative Aegon BlackRock LifePath strategies, and the AMT Fund Range based on their suitability to satisfy the needs of Members within the Scheme.

Most investments used in the Aegon BlackRock LifePath strategies are passively managed, with the exception of the final 10 years of Aegon BlackRock Capital funds and Aegon BlackRock Retirement funds, which are managed actively by the relevant asset manager.

The Trustees recognise that there are additional risks and costs entailed in using actively managed funds.



As a result, where a specific design objective can be met by a passively managed fund, it will be preferred to an actively managed fund. An actively managed fund would be selected in the following circumstances:

- where the relevant strategy isn't available through a passively managed fund;
- where the benefits of using the actively managed fund outweigh the cost considerations; or
- where the actively managed fund is being used to diversify asset manager risk in actively managed blended portfolios.

In regard to monitoring the funds, the Trustees receive a quarterly performance report which details information on underlying investment performance, strategy and overall risks which is considered at a relevant Trustee meeting. To aid with monitoring, the asset managers may also be invited to present in person to the Trustees on their performance, strategy and risk exposures.

### **Income drawdown**

The Trustees have chosen to offer Aegon BlackRock LifePath Flexi funds for Members who would like to target income drawdown in their retirement. Within the AMT Fund Range there are other options available for Members to select the investments most suitable for their retirement needs, this also includes the alternative LifePath default options (LifePath Capital and LifePath Retirement).

## Appendix 2 to SIP – Bespoke Notional Sections

Employer	Investment objectives	Default objectives	Default arrangement(s)	Self-select fund range
Sun Life of Canada 2015 Employee Pension Plan	See section 2	See appendix 1	<p>After receiving advice from their investment adviser, the Sun Life of Canada 2015 Employee Pension Plan moved to using the following Aegon BlackRock LifePath strategies as default funds on 22 June 2022:</p> <ul style="list-style-type: none"> <li>• active members transferred to Aegon BlackRock LifePath Flexi;</li> <li>• two members very close to retirement moved to Aegon BlackRock LifePath Retirement; and</li> <li>• deferred members transferred to Aegon BlackRock LifePath Capital.</li> </ul>	Standard AMT Fund Range The Sun Life of Canada Fund

Employer	Investment objectives	Default objectives	Default arrangement(s)	Self-select fund range
SG Retirement Savings Plan	See section 2	See appendix 1	<p>Aegon BlackRock LifePath Flexi</p> <p>In addition to the default fund, it has been necessary for a blended fund – SG Property Dynamic Blend – to be created to facilitate staged redemptions from an underlying property fund. This fund was launched on 29<sup>th</sup> June 2021 and is considered to be an 'additional' default within SG Retirement Savings Plan Bespoke Notional Section.</p> <p>SG Property Dynamic Blend is a blend of direct property and listed property securities.</p> <p>The Fund is a temporary arrangement designed to facilitate disinvestment from the underlying Direct Property exposure, whereby the cashflows from each disinvestment will be automatically invested in Property Securities until such a time as 100% of the Fund is invested in Property Securities. At this point members will be contacted, and their money transferred to Aegon BlackRock LifePath Flexi (the Scheme default) or an alternative self-select fund if instructed by the member.</p>	<p><b>Selected from the Old Core Fund Range:</b></p> <p>Aegon BlackRock 30/70 Currency Hedged Global Equity Index (BLK)  Aegon BlackRock Cash (BLK)  Aegon BlackRock Diversified Growth (BLK)  Aegon BlackRock Emerging Markets Equity Index (BLK)  Aegon BlackRock Market Advantage (BLK)  Aegon BlackRock Pre-Retirement (BLK)  Aegon BlackRock UK Equity Index (BLK)  Aegon BlackRock World (ex-UK) Equity Index (BLK)  Aegon HSBC Islamic Global Equity Index (BLK)  Aegon LGIM Ethical Global Equity Index (BLK)  Aegon Baillie Gifford Positive Change  Aegon HSBC Developed World Sustainable Equity Index  Aegon Ninety One Global Multi-Asset Sustainable Growth</p> <p><b>Additional Fund choice:</b></p> <p>Aegon BlackRock US Equity Index (BLK)  Aegon BlackRock European Equity Index (BLK)  Aegon BlackRock Japanese Equity Index (BLK)  Aegon BlackRock Pacific Rim Equity Index (BLK)</p>

			<p>The default option complies with the charge cap.</p> <p>The Trustees review the default arrangement at least every 3-years and without delay following any significant change in investment policy or demographic profile of Members from the SG Retirement Savings Plan.</p> <p>The Trustees received independent advice on the suitability of this solution. The review was comfortable with the construction of the fund, and in particular the use of property securities as a short-term home for Members' assets pending the redemption of all assets in the Fund.</p>	<p>Aegon BlackRock MSCI Currency Hedged World Index (BLK)</p> <p>Aegon BlackRock UK Special Situations (BLK)</p> <p>SG Passive Global Equity Fund</p> <p>SG Active Global Equity Fund</p> <p>SG Diversified Growth Fund</p> <p>Aegon BlackRock Absolute Return Bond (BLK)</p> <p>Aegon BlackRock Corporate Bond All-Stocks Index (BLK)</p> <p>Aegon BlackRock All Stocks UK Gilt Index (BLK)</p> <p>Aegon BlackRock Index-Linked Gilt (BLK)</p>
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### Former Bespoke Notional Sections

After receiving investment advice from Isio, the following participating employers now have access to the standard Scheme fund range (Aegon BlackRock LifePath and the AMT Fund Range) only.

These notional sections are no longer considered to be Bespoke Notional Sections.

Employer	Transition completed	Summary of changes
The MacIntyre Group Pension Scheme	31 <sup>st</sup> July 2023	Removal of 3 funds Retention of 3 funds Addition of 22 funds
The Anglo American UK Pension Plan	30 <sup>th</sup> June 2023	Removal of 12 funds Retention of 9 funds Addition of 16 funds
Turner & Townsend Pension Plan	31 <sup>st</sup> July 2023	Removal of 10 funds Retention of 2 funds Addition of 23 funds
Skanska DC2018 Plan	30 <sup>th</sup> June 2023	Removal of 9 funds Retention of 6 funds Addition of 19 funds
Beales Deferred Section of the Aegon Master Trust	30 <sup>th</sup> June 2023	Removal of 7 funds Retention of 6 funds Addition of 19 funds
Archant Pension Plan	30 <sup>th</sup> June 2023	Removal of 34 funds Retention of 6 funds Addition of 19 funds
The Mars Pet Nutrition 2019 Pension Plan	30 <sup>th</sup> June 2023	Removal of 3 funds Retention of 4 funds Addition of 21 funds
KPMG Deferred Plan	30 <sup>th</sup> April 2024	Removal of 10 Retention of 9 Addition of 16

### Appendix 3 to SIP – standard fund range investment / performance objectives

The following tables provide information on the Aegon BlackRock LifePath strategies and the AMT Fund Range. As some funds in the AMT Fund Range are renamed versions of existing funds in the Old Core Range, these appear together in the tables below.

Default strategies	Investment objectives	Performance objective (before fees)
Aegon BlackRock LifePath Flexi fund (default)	<p>The Aegon BlackRock LifePath Flexi fund will initially invest Members in higher growth target investments.</p> <p>The funds will then glide towards an asset allocation split of approximately 40% global equities and 60% fixed income by its target retirement date.</p>	<p>The fund aims to track the markets in which it invests. The benchmark is a composite index reflecting these markets and Aegon BlackRock LifePath Flexi's exposure to them. Like Aegon BlackRock LifePath Flexi the composite benchmark changes its asset allocation over time and will differ from the growth phase to the retirement phase.</p>
Aegon BlackRock LifePath Retirement fund	<p>The Aegon BlackRock LifePath Retirement Fund will initially invest Members in higher growth target investments. The Fund will glide towards a lower risk asset allocation designed to track annuity rates. It is 75% invested in the Aegon BlackRock Pre-Retirement Fund at its target retirement date, which invests mainly in UK government bonds (gilts), UK corporate bonds and other fixed income securities, aiming to produce a return in excess of a benchmark designed to reflect long-term changes in immediate annuity prices. At this point, the fund also has a 25% allocation to cash-like investments for Members taking 25% of their savings tax free.</p>	<p>The fund aims to initially track the markets in which it invests. The benchmark is a composite index reflecting these markets and Aegon BlackRock LifePath Retirement's exposure to them. At retirement the performance objective of the fund is to track immediate annuity rates with 75% of the fund's allocation.</p>
Aegon BlackRock LifePath Capital fund	<p>The LifePath Capital fund will initially invest Members in higher growth target investments. The fund is designed to glide towards cash-like investments and will invest in the Aegon BlackRock Cash Fund on reaching its target retirement date, which aims to produce a return in excess of its benchmark principally from a portfolio of sterling denominated cash, deposits and money-market instruments.</p>	<p>The fund aims to initially track the markets in which it invests. The benchmark is a composite index reflecting these markets and Aegon BlackRock LifePath Capital's exposure to them. At retirement the performance objective is to maintain capital value.</p>
Aegon Cash (AMT)	<p>The fund aims to produce a return in line with its benchmark by investing in money market instruments which may include</p>	<p>The fund aims to produce a return in line with the SONIA Sterling Over Night Index Average.</p>

	<p>cash, bank deposits and short-term fixed interest investments.</p> <p>This fund uses a set of exclusionary criteria which removes exposure to certain companies based on ESG concerns. The exclusionary thresholds and definitions are owned by a third party and subject to change.</p>	
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**Funds with a specific focus on sustainability built into their objective or investment process**

<b>AMT Fund Range</b>	<b>Investment objectives</b>	<b>Performance objective (before fees)</b>
Aegon Global Climate Focus Equity (AMT)	<p>This fund aims to achieve capital growth by investing at least 80% of the fund's assets in the shares of companies across the globe with exposure to the theme of climate change solutions. Derivatives may also be used for investment and efficient portfolio management purposes.</p> <p>The fund is actively managed, so returns may not replicate those of the benchmark.</p>	The fund aims to outperform the MSCI All Country World Net Index GBP Index.
Aegon Global Short Term Sustainable Bond (AMT)	<p>This fund invests in a range of global short-dated investment grade bonds primarily with 4 years or less to maturity. The fund can also invest in high yield, callable and non-rated bonds. It uses proprietary climate transition research to identify companies that have robust, credible plans to transition towards a low carbon economy. Derivatives may also be used for investment and efficient portfolio management purposes.</p> <p>The fund is actively managed, so returns may not replicate those of the benchmark.</p>	The fund aims to outperform the Sterling Over Night Index Average.
Aegon Global Sustainable Government Bond (AMT)	<p>This fund will seek to achieve its investment objective by investing at least 67% of its net assets directly or indirectly in government bonds issued across the globe. The remainder will be invested in liquid assets such as cash and cash equivalents. The asset manager aims to add value by investing in financially strong countries that contribute to the improvements in sustainability targets as defined by the United Nations (UN) Sustainable Development Goals (SDGs). Derivatives may also be</p>	The fund aims to outperform the FTSE Non-GBP World Government Bond Index.

	<p>used for investment and efficient portfolio management purposes.</p> <p>The fund is actively managed, so returns may not replicate those of the benchmark.</p>	
Aegon Global Sustainable Equity (AMT)	<p>This fund aims to outperform its benchmark by at least 2% per year over rolling five-year periods. It does so by investing in the shares of between 25-50 companies across the globe the asset manager believes can deliver positive change in one of four current areas: Social Inclusion and Education, Environment and Resource Needs, Healthcare and Quality of Life; and addressing the needs of the world's poorest populations.</p> <p>The fund is actively managed, so returns may not replicate those of the benchmark.</p>	The fund aims to outperform the MSCI ACWI Index by at least 2% per year over rolling five-year periods.
Aegon Global Sustainable Multi-Asset Growth (AMT)	<p>This fund aims to provide <b>capital growth (to grow the value of your investment) and income</b> over rolling 5-year periods by investing in assets across the globe such as the shares of companies, bonds, and alternative assets. Derivatives may also be used for investment purposes.</p> <p>The fund focuses on investing in companies and countries the asset manager believes to have policies, operations and/or business models that aim to minimise their harmful effects on society and the environment, or whose products and/or services seek to benefit society and the environment.</p> <p>The fund is actively managed, so returns may not replicate those of the benchmark.</p>	Composite Index of 60% MSCI ACWI NR GBP Hedged + 40% JPM Government Bond Index (GBI) GBP Hedged.
Aegon Global Sustainable Multi-Asset Balanced (AMT)	<p>This fund aims to deliver returns over the long term (5 consecutive years) which exceed 3 Month SONIA Compounded in Arrears + 3.5% (before charges) by investing in assets across the globe such as the shares of companies, bonds, and alternative assets. Derivatives may also be used for investment purposes.</p> <p>The consideration of Environmental, Social and Governance (ESG) issues are</p>	The fund targets 3.5% above 3-month LIBOR over the long term (5 consecutive years).

	<p>integrated into the investment process of this fund.</p> <p>The fund is actively managed, so returns may not replicate those of the benchmark.</p>	
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### Funds which integrate exclusionary criteria

This means that based on certain thresholds, they will not invest in certain companies, based on ESG concerns. The following funds integrate exclusions including but not limited to controversial weapons, nuclear weapons, civilian firearms, and UN Compact violators:

<b>AMT Fund Range</b>	<b>Investment objectives</b>	<b>Performance objective (before fees)</b>
Aegon Global Small Cap Equity Tracker (AMT)	<p>This fund aims to produce a return in line with its benchmark by investing in the shares of smaller companies from across the globe. Derivatives may also be used for investment and efficient portfolio management purposes. The use of derivatives is expected to be limited.</p> <p>This fund uses a set of exclusionary criteria which removes exposure to certain companies based on ESG concerns. The exclusionary thresholds and definitions are owned by a third party and subject to change.</p>	The fund aims to track the MSCI World Small Cap ESG Index.
Aegon Emerging Markets Equity Tracker (AMT)	<p>This fund aims to produce a return in line with its benchmark by investing in the shares of companies domiciled in Emerging Markets and through other transferable securities that give exposure to such companies. Derivatives may also be used for investment and efficient portfolio management purposes.</p> <p>This fund uses a set of exclusionary criteria which removes exposure to certain companies based on ESG concerns. The exclusionary thresholds and definitions are owned by a third party and subject to change.</p>	The fund aims to track the Morningstar Dev Markets Asia Pacific ex-Jap ESG Enhanced UK12PM Net Index.
Aegon Europe ex-UK Equity Tracker (AMT)	<p>This fund aims to produce a return in line with its benchmark by investing in the shares of European companies excluding UK companies. Derivatives may also be used for investment and efficient portfolio management purposes. The use of derivatives is expected to be limited.</p> <p>This fund uses a set of exclusionary criteria which removes exposure to certain companies based on ESG concerns. The exclusionary thresholds and</p>	The fund aims to track the FTSE All World Developed Europe ex UK Net of Tax GBP Index.

	definitions are owned by a third party and subject to change.	
Aegon Japan Equity Tracker (AMT)	<p>This fund aims to produce a return in line with its benchmark by investing in the shares of Japanese companies. Derivatives may also be used for investment and efficient portfolio management purposes. The use of derivatives is expected to be limited.</p> <p>This fund uses a set of exclusionary criteria which removes exposure to certain companies based on ESG concerns. The exclusionary thresholds and definitions are owned by a third party and subject to change.</p>	The fund aims to track the FTSE All World Japan Net of Tax GBP
Aegon Pacific ex-Japan Equity Tracker (AMT)	<p>This fund aims to produce a return in line with its benchmark by investing in the shares of Asian (excluding Japan) companies. Derivatives may also be used for investment and efficient portfolio management purposes. The use of derivatives is expected to be limited.</p> <p>This fund uses a set of exclusionary criteria which removes exposure to certain companies based on ESG concerns. The exclusionary thresholds and definitions are owned by a third party and subject to change.</p>	The fund aims to track the Morningstar Emerging Markets ESG Enhanced Index (Net) Index.
Aegon US Equity Tracker (AMT)	<p>The fund aims to produce a return in line with its benchmark by investing in the shares of a range of US companies. Derivatives may also be used for investment and efficient portfolio management purposes.</p> <p>This fund uses a set of exclusionary criteria which removes exposure to certain companies based on ESG concerns. The exclusionary thresholds and definitions are owned by a third party and subject to change.</p>	The fund aims to track the FTSE United States GBP Index.
Aegon UK Corporate Bond Tracker (AMT)	<p>This fund aims to produce a return in line with its benchmark by investing in a range fixed income securities (such as bonds) that comply with the index credit rating requirements. Derivatives may also be used for investment and efficient portfolio management purposes.</p>	The fund aims to track the iBoxx Sterling Non-Gilts Index.

	<p>This fund uses a set of exclusionary criteria which removes exposure to certain companies based on ESG concerns. The exclusionary thresholds and definitions are owned by a third party and subject to change.</p>	
Aegon Retirement Income Multi-Asset (AMT)	<p>This fund is designed for members who wish to stay invested post-retirement and draw down an income from their Defined Contribution pot. This fund aims to produce a return in line with its benchmark by investing in predominantly fixed income assets and some equities. Exchange rate movements can affect the value of investments that are in foreign currencies and therefore the fund will use specific instruments with the aim of hedging out the majority of the foreign currency exposures.</p> <p>This fund uses a set of exclusionary criteria which removes exposure to certain companies based on ESG concerns. The exclusionary thresholds and definitions are owned by a third party and subject to change.</p>	<p>The fund aims to track 75% DC Pre-Retirement Fund Benchmark / 25% SONIA Sterling Over Night Index Average.</p>
Aegon Global Listed Infrastructure (AMT)	<p>This fund aims to deliver a combination of capital growth and income higher than that of its benchmark over any five-year period (after charges) by investing at least 80% in shares issued by global infrastructure companies, investment trusts and real estate investment trusts. It will typically hold shares in fewer than 50 companies. Derivatives may also be used for investment and efficient portfolio management purposes. The use of derivatives is expected to be limited. The Aegon fund has higher charges than the underlying fund and will therefore be less likely to meet this target.</p> <p>This fund uses a set of exclusionary criteria which removes exposure to certain companies based on ESG concerns. The exclusionary thresholds and definitions are owned by a third party and subject to change.</p>	<p>The fund aims to outperform the MSCI All Country World Index.</p>
Aegon Cash (AMT)	<p>The fund aims to produce a return in line with its benchmark by investing in money market instruments which may include</p>	<p>The fund aims to produce a return in line with the SONIA Sterling Over Night Index Average.</p>

	<p>cash, bank deposits and short-term fixed interest investments.</p> <p>This fund uses a set of exclusionary criteria which removes exposure to certain companies based on ESG concerns. The exclusionary thresholds and definitions are owned by a third party and subject to change.</p>	
Aegon Global Islamic Equity Tracker (AMT)	<p>This fund aims to deliver a return in line with its benchmark by investing in the shares of companies engaged in Sharia-compliant activities across the globe. Derivatives may also be used for investment purposes. The use of derivatives is expected to be limited.</p> <p>This fund uses a set of exclusionary criteria which removes exposure to certain companies based on ESG concerns. The exclusionary thresholds and definitions are owned by a third party and subject to change.</p> <p>Please note: Although this fund invests in companies engaged in Sharia compliant activities, the Aegon Master Trust product may not meet all the requirements for Sharia compliance. For more information please view the Scheme documentation.</p>	The fund aims to track the Dow Jones Islamic Market Titans 100 Net Total Return Index.
Aegon Developed Markets ex-UK Equity Tracker (AMT)	<p>This fund aims to produce a return in line with its benchmark by investing in the shares of overseas companies excluding the UK. Derivatives may also be used for investment purposes. The use of derivatives is expected to be limited.</p> <p>This fund uses a set of exclusionary criteria which removes exposure to certain companies based on ESG concerns. The exclusionary thresholds and definitions are owned by a third party and subject to change.</p>	The fund aims to track the FTSE All-World Developed ex-UK Index.
Aegon Developed Markets Equity Tracker (AMT)	<p>This fund aims to deliver a return in line with its benchmark by investing in the shares of companies in Developed Markets (in UK, Europe, Asia, North America). Derivatives may also be used for investment purposes. The use of derivatives is expected to be limited.</p>	The fund aims to track the performance of the FTSE Developed ESG Low Carbon Select Index.

	<p>This fund uses a set of exclusionary criteria which removes exposure to certain companies based on ESG concerns. The exclusionary thresholds and definitions are owned by a third party and subject to change.</p>	
<p>Aegon UK Equity Tracker (AMT)</p>	<p>This fund aims to produce a return in line with its benchmark by investing in the shares of UK companies. Derivatives may also be used for investment purposes. The use of derivatives is expected to be limited.</p> <p>This fund uses a set of exclusionary criteria which removes exposure to certain companies based on ESG concerns. The exclusionary thresholds and definitions are owned by a third party and subject to change.</p>	<p>The fund aims to track the FTSE All Share Index.</p>

**Funds which integrate ESG considerations within their overall investment process**

<b>AMT Fund Range</b>	<b>Investment objectives</b>	<b>Performance objective (before fees)</b>
Aegon Global Absolute Return Bond (AMT)	<p>This fund invests in global debt instruments, ranging from AAA rated government bonds through to high yield and emerging market bonds and aims to generate positive absolute returns over a rolling three-year period. Derivatives may also be used for investment and efficient portfolio management purposes.</p> <p>The consideration of ESG issues is integrated into the investment process of this fund.</p>	The fund aims to outperform the Sterling Over Night Index Average.
Aegon Global Strategic Bond (AMT)	<p>This fund aims to deliver a positive return of 4% above the Overnight SONIA rate before charges over a 5-year rolling period by investing in bonds issued by companies with credit ratings typically BBB or lower.</p> <p>The consideration of ESG issues is integrated into the investment process of this fund.</p>	The fund aims to outperform the Sterling Over Night Index Average +4% over a 5-year rolling period.
Aegon UK Property (AMT)	<p>The fund aims to provide a return in-line with its benchmark by investing in a portfolio of balanced open-ended UK property funds. The fund is actively managed, so returns may not replicate those of the benchmark.</p> <p>The consideration of ESG issues is integrated into the investment process of this fund.</p>	The fund aims to outperform the IPD All Balanced Property Funds Index.
Aegon UK Index-Linked Government Bond Tracker (AMT)	This fund aims to produce a return in line with its benchmark by investing in UK index-linked government bonds that have a maturity period of 5 years or longer.	The fund aims to track the FTSE Actuaries UK Index-Linked Gilts over 5 Years Index.
Aegon UK Government Bond Tracker (AMT)	This fund aims to produce a return in line with its benchmark by investing in UK government bonds that have a maturity period of 15 years or longer.	The fund aims to track the FTSE Actuaries UK Conventional Gilts over 15 Years Index.