Pension Scheme Registry number: 19002029

E.ON UK GROUP OF THE ELECTRICITY SUPPLY PENSION SCHEME

ANNUAL REPORT AND FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 MARCH 2021

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REPORT OF THE GROUP TRUSTEES

INTRODUCTION

This Annual Report and Financial Statements is produced by the Group Trustees for the members of the E.ON UK Group (“the Group”) of the Electricity Supply Pension Scheme.

The Electricity Supply Pension Scheme (“the Scheme”) is an industry-wide pension scheme. The Scheme has 26 actuarially independent sections known as “Groups”. Each Group has its own Trustees and assets to fund the benefits of its members. Further information relating to the Scheme as a whole can be found in the Scheme Annual Report and Financial Statements.

The Scheme is an occupational pension scheme established under irrevocable trusts and its provisions are set out in the Clauses and Rules contained in the Scheme document. The Scheme is a registered pension scheme under the Finance Act 2004 and was primarily contracted out of the State Second Pension until 5 April 2016, when contracting-out ceased for all pension schemes to coincide with the introduction of new State Pension arrangements.

In the case of the E.ON UK Group, the Group provides for:

- Defined Benefit (“DB”) pensions, where benefits are based on a member’s salary and length of service; and
- Defined Contribution (“DC”) pensions, where benefits are based on what a member’s accumulated fund value will purchase at retirement.

The Group has eight benefit categories which include four former Groups of the Electricity Supply Pension Scheme (Powergen, East Midlands Electricity (EME), Eastern and Midlands) as well as the EME Pension Plan (EMEPP), the Retirement Balance Plan (RB Plan), the Midlands Electricity Pension Scheme (MEPS) and the Eastern Group Pension Scheme (EGPS). Within the MEPS and EGPS categories there are both Defined Benefit and Defined Contribution sections. Since 1 December 2008 all categories have been closed to new members.

The Group’s Principal Employer is E.ON UK plc. The other Participating Employers in the Group during the year were:

E.ON UK Cogeneration Limited (ceased to participate with effect from 31 October 2020)
E.ON UK CHP Limited (ceased to participate with effect from 31 October 2020)
E.ON Connecting Energies Limited (ceased to participate with effect from 31 October 2020)

These are collectively referred to as ‘the Employers’ throughout this Report.

The Group Financial Statements on page 44 to 60 have been prepared and audited so as to comply with Regulations made under Sections 41 (1) and (6) of the Pensions Act 1995.

THE GROUP STRUCTURE AND RESPONSIBILITIES

The Group Trustees’ duties and responsibilities are carried out by a trust company, limited by guarantee, called E.ON UK Trustees Limited. The Directors of E.ON UK Trustees Limited have the same functions as individual Group Trustees. The rules for their appointment, election and tenure of office are exactly the same as individual Group Trustees, as are their responsibilities under the provisions of the Scheme and pensions legislation.

There is also a central Scheme Trustee, Electricity Pensions Trustee Limited (“EPTL”), which is a trust corporation and consists of a Council and a smaller Board of Directors.

For simplicity the term 'Group Trustees' has been used elsewhere in this Report as shorthand for the more accurate term 'Directors of E.ON UK Trustees Limited'.

The Group has 10 Trustees of whom 5 are appointed by E.ON UK plc and 5* are nominated by the members, as follows:

Appointed	Member-Nominated
Stefan Brenk	Mike Andrews
Capital Cranfield Pension Trustees Limited represented by Martine Trouard-Riolle – Chair	Chris Brown
John Harding (to 30 June 2020)	Ant Donaldson (to 29 January 2021)
Sara Leavesley (from 1 July 2020)	Derek Evans
Keith Plowman – Deputy Chair	Adrian Harris
Graeme Thompson	

*Following the resignation of Ant Donaldson as a Trustee with effect from 29 January 2021, the remaining Member-Nominated Trustees decided to leave the vacancy unfilled until the end of Mr Donaldson's planned tenure (30 June 2022).

The Group Trustees met 9 times during the year.

Trustee committees

The Group Trustees delegate some of their work to committees whilst still remaining ultimately responsible. These committees are as follows:

- The Audit Committee is responsible for oversight of the Group's internal controls, risk management, accounting processes and the preparation of the annual report and financial statements. The Committee met 5 times during the year. The members of the Committee are John Harding (chair, to 30 June 2020), Graeme Thompson (chair, from 23 July 2020) and Adrian Harris. Gary Burmiston (Senior Vice President, Corporate Audit, E.ON) is also a member of the Committee by invitation of the Group Trustees.

- The Determinations Committee is responsible for determining the recipients of benefits payable under discretionary trust and for considering and responding to complaints under the Internal Dispute Resolution Procedure. The Committee met frequently during the year. The members of the Committee are Adrian Harris (chair), Chris Brown, Derek Evans, John Harding (to 30 June 2020) and Sara Leavesley (from 23 July 2020).

- The Investment Committee gives detailed consideration to certain investment matters and has delegated authority to make investment decisions within risk parameters defined by the Trustee Board. The Committee met 9 times during the year. The members of the Committee are Martine Trouard-Riolle (chair), Mike Andrews, Stefan Brenk, Ant Donaldson (to 29 January 2021), Graeme Thompson (to 23 July 2020) and Keith Plowman (from 23 July 2020). Manpreet Rattan (E.ON SE Pension Finance & Asset Strategy team) was also a member of the Committee by invitation of the Group Trustees.

Appointment of Group Trustees

Member-Nominated Group Trustees normally serve for a term of six years. The next nomination and selection/election process is due to take place in 2022. In addition to changes that take place at a scheduled nomination and selection/election process, a Member-Nominated Group Trustee ceases to be a Trustee if he/she resigns, ceases to be a contributing member or pensioner of the Group, or is removed from office by a majority of the other Member-Nominated Group Trustees. A casual vacancy for a Member-Nominated Group Trustee can be filled by a person nominated by the remaining Member-Nominated Group Trustees.

The Appointed Group Trustees can be removed by E.ON UK plc. The rules for the appointment, election and tenure of office of Group Trustees are set out in the Articles of Association of E.ON UK Trustees Limited.

STATEMENT OF GROUP TRUSTEES' RESPONSIBILITIES

Group Trustees' responsibilities in respect of the financial statements

The financial statements, which are prepared in accordance with United Kingdom Generally Accepted Accounting Practice, including the Financial Reporting Standard applicable in the UK and Republic of Ireland ("FRS 102"), are the responsibility of the Group Trustees. Pension scheme regulations require, and the Group Trustees are responsible for ensuring, that those financial statements:

- show a true and fair view of the financial transactions of the Group during the Group year and of the amount and disposition at the end of the Group year of its assets and liabilities, other than liabilities to pay pensions and benefits after the end of the Group year; and

- contain the information specified in Regulation 3A of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, including making a statement whether the financial statements have been prepared in accordance with the relevant financial reporting framework applicable to occupational pension schemes.

In discharging these responsibilities, the Group Trustees are responsible for selecting suitable accounting policies, to be applied consistently, making any estimates and judgements on a prudent and reasonable basis, and for ensuring that the financial statements are prepared on a going concern basis unless it is inappropriate to presume that the Group will continue as a going concern.

The Group Trustees are also responsible for making available certain other information about the Group in the form of an annual report.

The Group Trustees have a general responsibility for ensuring that accounting records are kept and for taking such steps as are reasonably open to them to safeguard the assets of the Group and to prevent and detect fraud and other irregularities, including the maintenance of an appropriate system of internal control.

Group Trustees' responsibilities in respect of contributions

The Group Trustees are responsible under pensions legislation for preparing, and from time to time reviewing and if necessary revising, a schedule of contributions showing the rates of contributions payable to the Group by or on behalf of employers and the active members of the Group and the dates on or before which such contributions are to be paid.

The Group Trustees are also responsible for keeping records in respect of contributions received in respect of any active member of the Group and for adopting risk-based processes to monitor whether contributions that fall due to be paid are paid into the Group in accordance with the schedule of contributions.

Where breaches of the schedule occur, the Group Trustees are required by the Pensions Acts 1995 and 2004 to consider making reports to the Pensions Regulator and to members.

The Group Trustees are also responsible for the maintenance and integrity of the pension scheme website (www.eon-uk.com/pensions). Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

Additional Group Trustees' responsibilities

The structure of the Scheme means that certain matters are dealt with by Group Trustees and certain matters dealt with by the Scheme Trustee. The main responsibilities of the Group Trustees are:

- to ensure benefits payable from the Group are paid as they fall due;
- to determine an investment strategy for Group assets;
- to ensure appropriate management of the Group assets;
- to arrange for regular actuarial valuations of the Group to be carried out in accordance with the funding principles agreed with the Employers;
- to prepare and agree with the Employers a Statement of Funding Principles which includes the actuarial assumptions used to assess the Group's liabilities;
- to agree a recovery plan with the Employers for making good any shortfall in assets against liabilities identified in periodic actuarial valuations; and
- to make available to members annual funding updates on the financial position of the Group.

The main responsibilities of the Scheme Trustee, EPTL, are:

- to ensure the safe custody and administrative control of assets;
- to produce the Scheme Report & Financial Statements on an annual basis and
- to ensure proper investment management of Group Assets invested in the Unitised Fund.

ADVISERS AND FUND MANAGERS

To assist them in their work the Group Trustees have appointed a team of professional advisers as follows:

Group Actuary David Eteen FIA of Aon Solutions UK Limited	Carries out valuations and other funding updates of the Group as required by the Scheme Rules and Statute, provides all tables and factors for the application of Scheme Rules and options, and advises on all matters relating to pension funding.
Independent Group Auditors PricewaterhouseCoopers LLP	Reports on the audit of the Group Financial Statements.
Scheme Custodian The Bank of New York Mellon	Maintains safe custody of the Scheme's assets.
Investment Advisers Cardano Risk Management B.V.	Advises the Group Trustees on all investment matters including the Statement of Investment Principles and on the long-term strategic benchmark having regard to the nature of the liabilities and the funding position of the Group.
Aon Solutions UK Limited	Advises the Group Trustees on all investment matters relating to the Defined Contribution and Additional Voluntary Contribution (AVC) arrangements.
Legal Advisers	
DLA Piper UK LLP	Principal legal adviser to the Group Trustees.
Field Fisher Waterhouse LLP	Additional legal adviser to the Group Trustees.
Performance Measurer The Bank of New York Mellon (Defined Benefit section)	Provides the Group Trustees with a measurement service for their investments relative to the strategic benchmark and on the performance of the investment managers.
Aon Solutions UK Limited (Defined Contribution section)	Retained by the Group Trustees to monitor the performance of the Defined Contribution and AVC providers.
Sponsor Covenant Assessor Lincoln Pensions Limited	Assesses the employer's willingness and ability to fund the Group's liabilities.
Administrator RPMI	Maintains individual records, calculates and pays the benefits on behalf of the Group Trustees.
Investment Adviser Assessor IC Select Limited	Assesses the investment adviser in relation to non-defined contribution assets and provides oversight of the Niche Assets portfolio.

Group Appointed Fund Managers – Defined Benefit Section
Aberdeen Property Investors UK Limited (terminated 30 March 2021)
Blue Mountain Capital Management LLC
Bridgewater Associates LP
Cambridge Associates LLC
Capula Investment Management LLP (terminated 31 December 2020)
Caxton Associates LP
Dorsal Capital Management, LLC (appointed 29 January 2021)
Egerton Capital Limited
Farallon Capital Management LLC
GoldenTree Asset Management LP
Insight Investment Management (Global) Limited
Invesco Perpetual Life Limited (terminated 11 November 2020)
J P Morgan Asset Management (Europe) SARL (appointed 9 July 2020)
Lyxor International Asset Management SAS
Rialto Partners GP RVCF, LLC (appointed 16 October 2020)
Sands Capital Management, LLC (appointed 11 November 2020)
Snow Lake Capital (HK) Limited (appointed 20 July 2020)
Two Sigma Advisers, LP
Wellington Management Company LLP (appointed 22 September 2020)
Westwood International Advisors (terminated 31 May 2020)
Winton Fund Management Limited (terminated 24 September 2020)

Group Appointed Fund Managers – Defined Contribution Section
Aegon
The Prudential Assurance Company Limited

Additional Voluntary Contribution (AVC) Providers
Aviva plc
Utmost Life and Pensions
The Prudential Assurance Company Limited
Royal London
Standard Life Assurance Limited

MEMBERSHIP STATISTICS

Defined Benefit section

	Contributors	Pensioners	Dependants	Deferred Pensioners	Total
As at 1 April 2020	**1,817**	**11,845**	**3,950**	**6,197**	**23,809**
Adjustments to opening balance	-	52	1	204	257
As at 1 April 2020 (revised)	**1,817**	**11,897**	**3,951**	**6,401**	**24,066**
Retirements	(102)	330	-	(228)	-
Deaths	(1)	(497)	(333)	(11)	(842)
New dependants	-	-	251	-	251
Cessation of child allowances	-	-	(8)	-	(8)
Leavers with deferred pensions	(233)	-	-	233	-
Transfers to other schemes	-	-	-	(59)	(59)
As at 31 March 2021	**1,481**	**11,730**	**3,861**	**6,336**	**23,408**

Previously the number of deferred pensioners and pensioners who were entitled to/receiving a benefit equivalent to the relevant State Graduated Pension Scheme benefit in respect of service prior to 31 March 1975 were not included in the membership statistics above and were disclosed separately in a note below the table. These members are now disclosed in the above membership statistics which has resulted in the large adjustments to the opening balance.

Defined Contribution section

	Contributors	Annuitants	Dependants	Deferred Pensioners	Total
As at 1 April 2020	**13**	**34**	**1**	**417**	**465**
Adjustments to opening balance	1	-	-	(2)	(1)
As at 1 April 2020 (revised)	**14**	**34**	**1**	**415**	**464**
Leavers with deferred pensions	(14)	-	-	14	-
Deaths	-	-	-	(2)	(2)
Transfers to other schemes*	-	-	-	(427)	(427)
As at 31 March 2021	**-**	**34**	**1**	**-**	**35**

*All deferred pensioners had their benefits transferred to the Aviva Master Trust in January 2021.

PENSION INCREASES

The Rules of the Scheme applicable to the Group provide for the following increases to pensions in payment, children's allowances and deferred pensions:

Category	**Basis**
Powergen, EME, Eastern and Midlands	Pensions in payment, children's allowances and deferred pensions in relation to pensionable service before 1 November 2018 to be increased on an annual basis on 1 April each year in accordance with the rise in the Retail Prices Index (RPI) in the 12 months ended on the preceding 30 September. If the RPI increase is greater than 5% E.ON UK plc has the discretion to limit the pension increase to a lower figure subject to a minimum of 5%. For pensionable service from 1 November 2018, pensions in payment, children's allowances and deferred pensions to be increased on an annual basis on 1 April each year in accordance with the rise in the Consumer Prices Index (CPI) in the 12 months ended on the preceding 30 September subject to a maximum of 3%. If the CPI increase is greater than 3% E.ON UK plc has the discretion to limit the pension increase to a lower figure subject to a minimum of 3%.
EMEPP and MEPS	Pensions in payment and children's allowances in relation to pensionable service before 1 November 2018 to be increased on an annual basis on 1 April each year in accordance with the rise in the RPI in the 12 months ended on the preceding 30 September, subject to a maximum of 5% per annum. Pensions in payment and children's allowances in relation to pensionable service from 1 November 2018 to be increased on an annual basis on 1 April each year in accordance with the rise in the CPI in the 12 months ended on the preceding 30 September, subject to a maximum of 3% per annum. Deferred pensions to be increased over the number of complete years of deferment in line with the statutory provisions of the Pension Schemes Act 1993. With effect from 1 January 2011, the Government amended these statutory provisions such that the CPI replaced the RPI as the measure used for determining minimum increases to deferred pensions.
EGPS	Pensions in payment and children's allowances in relation to pensionable service before 1 November 2018 to be increased on an annual basis on 1 April each year by an amount not less than the lower of the rise in the RPI in the 12

	months ended on the preceding 30 September and 5%, or such greater amount as E.ON UK plc may determine. Pensions in payment and children's allowances in relation to pensionable service from 1 November 2018 to be increased on an annual basis on 1 April each year by an amount not less than the lower of the rise in the CPI in the 12 months ended on the preceding 30 September and 3%, or such greater amount as E.ON UK plc may determine. Deferred pensions in relation to pensionable service before 1 November 2018 to be increased over the number of complete years of deferment by the increase in the RPI over the period subject to a maximum of 5% per annum. Deferred pensions in relation to pensionable service from 1 November 2018 to be increased over the number of complete years of deferment by the increase in the CPI over the period subject to a maximum of 3% per annum.
Retirement Balance Plan	Retirement Balances are increased in the period before payment on an annual basis on each 1 April in accordance with the rise in the CPI in the 12 months ended on the preceding 30 September. E.ON UK plc has discretion to vary this increase.

The pensions increase applied from 1 April 2021 in relation to pensionable service before 1 November 2018 was 1.1% in line with the RPI increase for the 12 months to September 2020 and was therefore non-discretionary. The pensions increase applied from 1 April 2021 in relation to pensionable service from 1 November 2018 was 0.5% in line with the CPI increase for the 12 months to September 2020 and was therefore non-discretionary. A proportionate increase was applied to pensions which came into payment between 2 April 2020 and 1 March 2021 for all categories.

Pension increases over the previous five years were:

1 April 2020	2.4% (1.7% in relation to pensionable service from 1 November 2018)
1 April 2019	3.3% (2.4% in relation to pensionable service from 1 November 2018)
1 April 2018	3.9%
1 April 2017	2.0%
1 April 2016	0.8%

TRANSFERS FROM THE GROUP

Deferred pensioners can transfer the cash equivalent of their deferred benefits to another registered pension scheme. Cash equivalents are calculated and verified in accordance with Pension Schemes Act 1993. The policy of the Group Trustees is to make allowance for certain discretionary benefits. For all categories, excluding the RB Plan category, there is discretion to pay a pension to a dependant when the member dies without a surviving spouse or civil partner. On the death of a member in the RB Plan category there is discretion to pay a dependant's pension regardless of the marital status of the member.

INVESTMENT REPORT FOR THE YEAR ENDED 31 MARCH 2021

Statement of Investment Principles

The Group Trustees have adopted a Statement of Investment Principles (SIP) in accordance with Section 35 of the Pensions Act 1995. In preparing the SIP the Group Trustees took professional advice from Cardano Risk Management B.V. and consulted with the Principal Employer, E.ON UK plc.

The SIP covers the Group Trustees' policy on the following matters:

a) ensuring compliance with the current investment requirements;
b) the types of investment, and the balance between different types of investment;
c) risk;
d) expected return of investments;
e) realisation of investments;
f) voting rights; and
g) social, environmental and ethical investment considerations.

The latest SIP was adopted by the Group Trustees on 30 September 2020. A copy can be obtained by writing to the Group administrators, RPMI, whose address and telephone number are shown on page 18.

The asset allocation chosen to meet the Group Trustees' investment objective will normally fall within the ranges set out in the table below. The actual allocation at any point in time is based on advice from the Group Trustees' Investment Advisers and will take into account prevailing economic conditions and the wider investment environment in order to meet the target return over time while remaining within the risk level described in the SIP. The Group Trustees monitor the actual allocation versus the ranges set out below. The Group Trustees will consider advice and take appropriate action should the allocation fall outside of these ranges. This is likely to result in a plan to ensure that the allocation returns within range over a defined period of time and / or according to defined market triggers.

	Minimum (%)	Maximum (%)
Hedge Ratio		
Interest rate hedge ratio (as % of the liabilities)	55	100
Inflation hedge ratio (as % of the liabilities)	55	100
Fund Structures for Return Seeking Assets		
Non-traditional	0	40
Hedge Funds	0	40
Illiquids	0	30
Asset Classes		
Return Seeking Assets		
Credit	0	30
Equities	0	25
Property	0	15
Multi-Strategy and Macro Oriented	0	40
Niche Assets	0	10
Cash	0	10
Liability-Driven Investment Assets	45	100

The table above sets out the ranges within which the Group Trustees will operate during the normal course of implementing the investment strategy. Further information on the hedge ratio definition, fund structures for return seeking assets and the types of investments that would fall within the ranges stated above can be found in the SIP.

The Group Trustees have adopted a separate SIP related to the Defined Contribution section and the Additional Voluntary Contributions arrangements under the Defined Benefit section. The latest SIP was adopted on 25 July 2019. A copy is appended to the Group Trustees' Statement on Defined Contribution Governance on page 26. The investment objective of the Defined Contribution section is to offer a range of investments that are suitable for meeting members' long and short term investment objectives allowing for members' differing individual circumstances. Members may make a choice of one or more of the available investment funds in any combination.

Defined Benefit section

For all investment matters including establishing strategy, fund selection and independent assessment and performance monitoring (other than in relation to the Niche Assets portfolio), the Group Trustees are advised by Cardano Risk Management B.V.. Fund selection in relation to the Niche Assets portfolio is carried out by Cambridge Associates LLC.

The performance of the fund for the year ended 31 March 2021 was 6.4%. The annualised return on the fund in the past three Group years was 5.1%.

As at 31 March 2021 the investments comprised:

Class/Fund Asset Manager	Date of Inception	As at 31 March 2021 £million	Year ended 31 March 2021[1] Fund return[1]	 Return Relative to Benchmark[2]
Liability-Driven Investment Assets				
Insight	January 2006	2,323.2	-2.8%	0.2%
Credit (Bonds)				
Blue Mountain	February 2012	0.4	-15.4%	-52.7%
GoldenTree	April 2018	255.2	24.0%	23.8%
Rialto	October 2020	48.1	0.8%	0.8%
Wellington	September 2020	98.6	-6.1%	-0.5%
Equity				
Dorsal	January 2021	82.1	-1.3%	-1.3%
Egerton	August 2013	579.0	57.1%	6.4%
Lyxor	September 2013	254.1	22.6%	-0.5%
Sands	November 2020	113.5	1.8%	-4.5%
Snow Lake	July 2020	111.8	0.7%	0.7%
Multi-Strategy & Macro-Oriented				
Bridgewater	June 2013	215.5	16.4%	16.2%
Caxton	November 2011	168.0	40.8%	29.5%
Farallon	September 2018	269.7	12.4%	12.2%
Diversified Growth				
Two Sigma	June 2017	129.8	0.3%	0.1%
Niche Assets/Private Equity				
Cambridge Associates	September 2015	204.2	4.2%	4.0%
Other Hedging Assets				
US Dollar Hedge	November 2012	0.3	n/a	n/a
Global Equity Hedge	August 2020	-37.6	n/a	n/a
Other				
Other[4]	n/a	66.6	n/a	n/a
Total		**4,882.5**	**6.4%**	**9.4%**

[1] Returns are quoted for the full year or since date of first investment if less than one year and are net of fees.

[2] Returns are assessed against benchmarks specific to each fund.

[3] Liquidity Fund, Additional Voluntary Contributions assets, cash balances, and accruals.

The Group Trustees specify the investment objectives for each of these portfolios, including performance targets for each manager where applicable. Investment reports are received in accordance with the instructions of the Group Trustees, and representatives of each fund manager attend meetings of the Group Trustees as required to discuss the results of their management of the portfolio(s) concerned against targets.

Fund manager appointments and terminations during the year are shown on page 8.

All investment assets (other than those held in the Niche Assets/Private Equity portfolio) are readily marketable.

Fund manager fees across all of the portfolios are calculated as a percentage of the net asset value of the investment or, in limited circumstances, the exposure value of the investment. In some cases a cap or a floor is applied to the total fee a fund manager can charge each year. There are also instances where a fund manager may charge a performance related fee for generating exceptional returns.

Defined Contribution section

During the second half of 2019 and the first half of 2020, the Group Trustees carried out a full review of the market to select a Master Trust to which the assets of the Defined Contribution section would be transferred. These assets were subsequently transferred to the Aviva Master Trust in January 2021. Prior to this transfer, the range of funds that was available to Defined Contribution members and the performance of these funds can be analysed as follows:

MEPS category – The Prudential Assurance Company Limited

Fund Name	Asset Type	Year ended 31 March 2021* Fund Return %	Benchmark Return %
International Equity	Global equity (excluding UK)	39.9	37.5
UK Equity	UK equity	33.9	26.7
Discretionary	Mixed	28.1	23.9
Fixed Interest	Gilts and bonds	(4.8)	(5.5)
Index-linked	Index-linked gilts	3.1	2.6
UK Property	Commercial property	(0.7)	2.5
Cash	Money market	0.1	(0.1)
BlackRock Aquila UK Equity Index	UK equity	33.2	26.7
BlackRock Aquila World ex UK Index	Global equity (excluding UK)	46.6	39.7
BlackRock Aquila Consensus	Mixed	25.2	20.9
BlackRock Aquila Over 15 years UK Gilt Index	Gilts	(10.0)	(10.4)

*Although all assets were transferred to the Aviva Master Trust in January 2021, returns are stated for the full year to 31 March 2021

EGPS category - Aegon

Fund Name	Asset Type	Year ended 31 March 2021* Fund Return %	Benchmark Return %
BlackRock 70/30 Global Growth	Global equity	33.5	30.3
BlackRock Balanced Growth	Mixed	27.0	23.0
BlackRock Pre-Retirement	Long-dated gilts	(1.4)	(2.2)
BlackRock Cash	Money market	0.1	(0.1)
LGIM Global Equity (50:50) Index	Global equity	32.5	32.4
LGIM Multi Asset (formerly Consensus)	Mixed	21.1	26.4
BlackRock Long Gilt	Gilts	(10.4)	(10.4)
BlackRock Diversified Growth	Mixed	18.8	3.6

*Although all assets were transferred to the Aviva Master Trust in January 2021, returns are stated for the full year to 31 March 2021

The Defined Contribution unitised insurance policies are priced and traded daily by the fund providers. The Group Trustees regarded the Defined Contribution investments as readily marketable, other than the Prudential UK Property Fund, for which restrictions on certain types of withdrawals had been introduced due to the ongoing situation with COVID-19.

Employer-related investments

The Investment Regulations limit employer-related investments by occupational pension schemes. These investments include shares, loan stocks, debentures and other securities issued by the employers participating in the scheme and their associated companies, together with loans made to the employers, and any properties or land owned by the scheme and occupied by the employers.

The Regulations apply separately to each Group within the Scheme, by reference to the investments of the Group Trustees in the Employers participating in the Group and their associated companies, and provide that such employer-related investments must not exceed 5% of the market value of the Group's assets.

As at 31 March 2021 the Group had none of its assets (*2020: £nil*) invested directly in E.ON UK plc or its associated companies. There were also no assets (*2020: £nil*) invested indirectly in E.ON UK plc through pooled investment vehicles. This was in accordance with the policy of the Group Trustees.

Additional Voluntary Contribution (AVC) investments

The Group Trustees hold these assets invested separately from the main fund in the form of individual insurance policies. Each member receives an annual statement confirming the amount held in their account and the movements in the year. Details of the AVC providers can be found on page 8.

CUSTODY

The assets of the Group are subject to the overall custody and control of the Scheme and are held by Scheme-wide custodians appointed by Electricity Pensions Trustee Limited to safeguard the assets.

The Bank of New York Mellon is the custodian in relation to securities. Where certificates are available in relation to such securities, they are held by The Bank of New York Mellon and identified as investments of the Scheme. Where certificates are not available, but records are held in computer-based systems, the relevant accounts record the Scheme's ownership.

For Group-specific Funds, money at call and short notice is placed in accordance with the provisions of Investment Management Agreements negotiated between Group Trustees and Group-specific fund managers. Additionally, limits are in place to minimise exposure to any one bank. In each case the Scheme is identified as the lender.

All cash is held in bank accounts in the name of the Scheme, or in a fund manager's institutional cash fund, commonly called a cash pool. This type of investment allows cash to be invested across a broad range of institutions thereby reducing risk and exposure.

IMPLEMENTATION STATEMENT

New regulations, which came into force with effect from 1 October 2020, changed the way in which trustees of pension schemes must document in their SIP how they govern the management of their arrangements with their investment managers, in particular concerning stewardship matters and cost transparency. During the year, and following advice from their investment advisor, the Group Trustees reviewed and updated its SIP in advance of October 2020 to ensure that it is compliant with these new regulations.

In accordance with the Disclosure Regulations Schedule 3, 30(d)(iv) Investment Regulations 2(3)(d), from 1 October 2020 the Group Trustees have set out in their SIP their policies in relation to the following matters:

- how the arrangement with the asset manager incentivises the asset manager to align its investment strategy and decisions with the Group Trustees' policies mentioned in sub paragraph b of the Investment Regulations;

- how that arrangement incentivises the asset manager to make decisions based on assessments about medium- to long-term financial and non-financial performance of an issuer of debt or equity and to engage with issuers of debt or equity in order to improve their performance in the medium to long term;
- how the method (and time horizon) of the evaluation of the asset manager's performance and the remuneration for asset management services are in line with the Group Trustees' policies mentioned in sub paragraph b of the Investment Regulations;
- how the Group Trustees monitor portfolio turnover costs incurred by the asset manager, and how they define and monitor targeted portfolio turnover or turnover range; and
- the duration of the arrangement with the asset manager.

The Group Trustees' Implementation Statement, which sets out further voting and engagement information undertaken by the Group's investment managers for the year ended 31 March 2021, is set out on pages 31 to 38, and forms part of the Group Trustees' Report.

REPORT ON ACTUARIAL LIABILITIES

As required by Financial Reporting Standard 102, "The Financial Reporting Standard applicable in the United Kingdom and the Republic of Ireland" (FRS 102), the financial statements do not include liabilities in respect of promised retirement benefits.

Under section 222 of the Pensions Act 2004, every scheme is subject to the Statutory Funding Objective, which is to have sufficient and appropriate assets to cover its technical provisions, which represent the present value of benefits to which members are entitled based on pensionable service to the valuation date. This is to be assessed at least every 3 years using assumptions agreed between the Group Trustees and the employer and set out in the Statement of Funding Principles, a copy of which is available to Group members on request by writing to the Group administrators, RPMI, whose address and telephone number are shown on page 18.

The current statutory funding regime came into force at the end of 2005 and for this purpose each Group of the Electricity Supply Pension Scheme is treated as a pension scheme in its own right. The Group's latest actuarial valuation under this regime was carried out by the Group Actuary, David Eteen of Aon Hewitt Limited, as at 31 March 2018.

As part of the valuation as at 31 March 2018 the Group Trustees have prepared and agreed with the Employers their current Statement of Funding Principles. This statement includes details of the actuarial assumptions used to assess the Group's liabilities. The Pensions Regulator has issued a Code of Practice for the current funding regime and reviews valuations against this Code.

A summary of the results of the valuation as at 31 March 2018 are set out below:

Value of technical provisions:	£4,986m
Value of assets available to meet technical provisions:	£4,484m
Funding shortfall:	£502m
Funding level:	90%

The value of technical provisions is based on pensionable service to the valuation date and assumptions about various factors that will influence the Group in the future such as levels of investment returns and pay increases, when members will retire and how long members will live. The method and main assumptions underlying the valuation calculations were:

Method	Projected unit
Discount rate	The annualised gross redemption yield on the fixed interest gilt yield curve at the valuation date plus 1.1% p.a.
Rate of salary increase (excluding allowance for promotional increases)	If salary is below £70,000 p.a., 3% Limited Price Indexation (LPI) swap yield curve (based on Consumer Prices Index)

	(assumed until the £70,000 cap is reached). If salary is above £70,000 p.a., nil increases.
Retail Price inflation	The RPI swap yield curve at the valuation date
Consumer Price inflation	The RPI swap yield curve at the valuation date less 1.1% p.a.
Increases to pensions in payment	The 5% LPI swap yield curve (based on RPI) for pre-1 November 2018 accrued pensions in excess of GMPs. The 3% LPI swap yield curve (based on CPI) for post-31 October 2018 accrued pensions for the EME, Midlands, Powergen, Eastern and EGPS Categories. The 3% LPI swap yield curve (based on CPI) for post 88 GMPs.
Post-retirement mortality	S2P(M/F)A U2018 using the CMI_2017 Projections Model with smoothing parameter Sκ=8.0 for future improvements in mortality with an assumed long term improvement rate of 1.50% p.a. and no constant additional rate of mortality improvement. These tables have been scaled using combined scaling factors produced by Demographic Horizons™ adjusted to allow for the Group's actual pensioner mortality experience.

A recovery plan to repair the funding shortfall was agreed between the Group Trustees and the Employer on 27 June 2019. Under this plan, a payment of £65m was made in January 2019, further payments totalling £233.8m were made in August 2019, and two further payments of up to £91.5m each will be made in January 2022 and January 2023. If the assumptions underlying the valuation calculations are borne out in practice the funding shortfall is expected to be eliminated by 31 January 2023.

The funding position shown by the Annual Actuarial Report prepared by the Group Actuary as at 31 March 2020 is as follows:

Value of technical provisions:	£5,219m
Value of assets available to meet technical provisions:	£4,763m
Funding shortfall:	£456m
Funding level:	91%

If the assumptions used for the 2018 actuarial valuation had been borne out in practice, then, based on the agreed contributions, the shortfall would have been expected to have decreased to £195 million at 31 March 2020. The deterioration in the Group's funding position compared with that expected is due to the increase in the value of the liabilities caused by falling UK Government bond yields not being fully offset by the investment return on the Group's assets.

The actuarial valuation due as at 31 March 2021 is currently being carried out and is expected to be completed within the statutory timescale of 30 June 2022.

Guaranteed Minimum Pension ("GMP") Equalisation

The Group has undertaken a process of assessing the overall impact of the October 2018 ruling regarding GMP Equalisation and based on an initial assessment by the actuary, an estimate of £8 million has been determined for the full liability. The Group Trustees have not included a liability in respect of these matters in these Financial Statements. They will be accounted for in the year they are determined.

On 20 November 2020, the High Court handed down a further judgment on the GMP equalisation case in relation to the Lloyds Banking group pension schemes. This follows from the original judgement in October 2018. This latest judgment confirms that defined benefit schemes which provide GMPs need to revisit and where necessary top up historic Cash Equivalent Transfer Values that were calculated based on unequalised benefits. The issues determined by the judgment arise in relation to many other defined benefit pension schemes. The Group has historical transfers which may be subject to adjustment as a result of this second ruling. The Group Trustees will be considering this at a future meeting and decisions will be made as to the next steps. Any adjustments necessary will be recognised in the Financial Statements in future years. At the date of signing these Financial Statements, it is not possible to estimate the value of any such adjustments at this time.

COVID-19 PANDEMIC

The Group Trustees have continued to monitor the consequences of the COVID-19 pandemic for the Group and have considered the following areas in particular:

- The administration of benefits and payment of pensions by the Group's Administrator, RPMI, including their business continuity planning, operational resilience, cyber/IT security measures and the maintenance of their control environment;
- The financial position of the sponsoring employer and the payment of contributions due;
- The effect on the Group Trustees' investment strategy, the value of the Group's assets and the ability to provide sufficient cashflow to support pension and other benefit payments.

The Group Trustees are satisfied having assessed these areas on a regular basis throughout the Covid-19 pandemic that the risks posed to the operation and management of the Group and its investments have been sufficiently understood and mitigated where appropriate.

ADDRESS FOR ENQUIRIES

Enquiries about the administration of benefits, payment of pensions and requests for copies of the Statement of Investment Principles, the actuarial valuation report, the Statement of Funding Principles and the Schedule of Contributions should be addressed to the administrators as follows:

RPMI
2 Rye Hill Office Park
Birmingham Road
Coventry
CV5 9AB

Telephone: 02476 472541
Email: enquiries@rpmi.co.uk

Approved by and signed on behalf of the Group Trustees on 26 August 2021.

Martine Trouard-Riolle
On behalf of Capital Cranfield
Pension Trustees Limited – Chair of the Group Trustees

Graeme Thompson
Director

ACTUARIAL CERTIFICATION OF SCHEDULE OF CONTRIBUTIONS

Name of scheme: E.ON UK Group of the Electricity Supply Pension Scheme ("the Group")

Adequacy of rates of contributions

1. I certify that, in my opinion, the rates of contributions shown in this schedule of contributions are such that the statutory funding objective could have been expected on 31 March 2018 to be met by the end of the period specified in the recovery plan dated 27 June 2019.

Adherence to statement of funding principles

2. I hereby certify that, in my opinion, this schedule of contributions is consistent with the Statement of Funding Principles dated 27 June 2019.

The certification of the adequacy of the rates of contributions for the purpose of securing that the statutory funding objective can be expected to be met is not a certification of their adequacy for the purpose of securing the Group's liabilities by the purchase of annuities, if the Group were to be wound up.

Signature		Date	27 June 2019
Name:	David Eteen	Qualification:	Fellow of the Institute and Faculty of Actuaries
Address:	Verulam Point Station Way St Albans Hertfordshire AL1 5HE	Name of employer:	Aon Hewitt Ltd

GROUP TRUSTEES' STATEMENT ON DC GOVERNANCE – SCHEME YEAR ENDED 31 MARCH 2021

The Occupational Pension Schemes (Scheme Administration) Regulations 1996 ("the Administration Regulations") were amended by the Occupational Pension Schemes (Charges and Governance) Regulations 2015 to include the requirement for the Trustee to prepare an annual statement regarding governance of Defined Contribution (DC) funds within the Group, which must be included in the annual report.

This statement is in respect of the DC Category of the Group (the MEPS and EGPS Categories) and the Additional Voluntary Contribution (AVC) arrangements. The DC funds were transferred out of the Group in January 2021 therefore this is the last full DC Governance Statement the Group Trustee will produce.

This statement covers governance and charges disclosures in relation to the items set out below for the period 1 April 2020 to 31 March 2021:

- The default investment strategy
- Charges and transaction costs paid by members
- Processing of core financial transactions, and
- Trustee knowledge and understanding

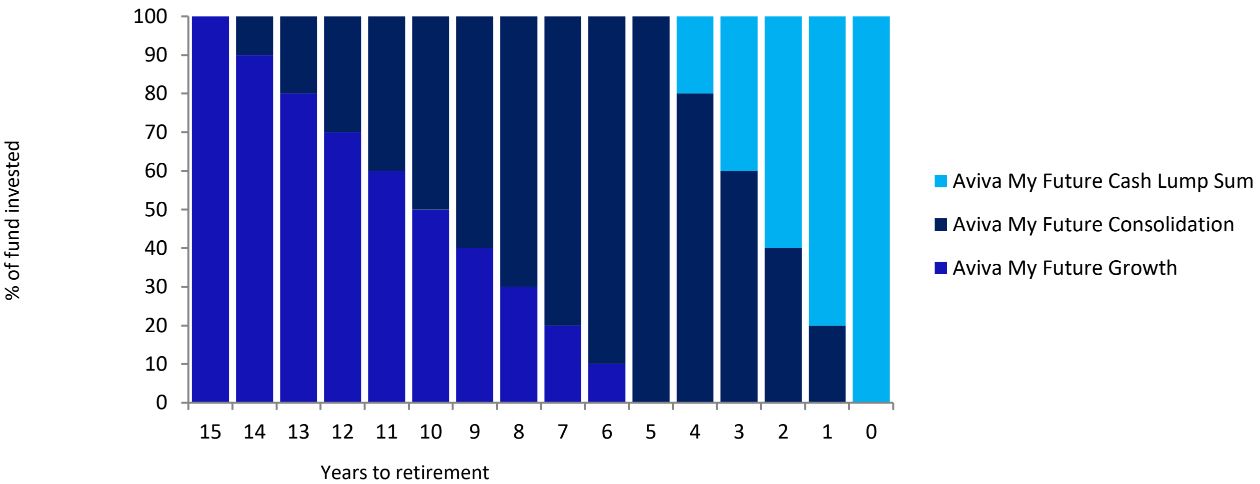
The Default Investment Strategy

The MEPS Category of the Group was used as a Qualifying Scheme for auto-enrolment purposes for active members until 30 September 2020.

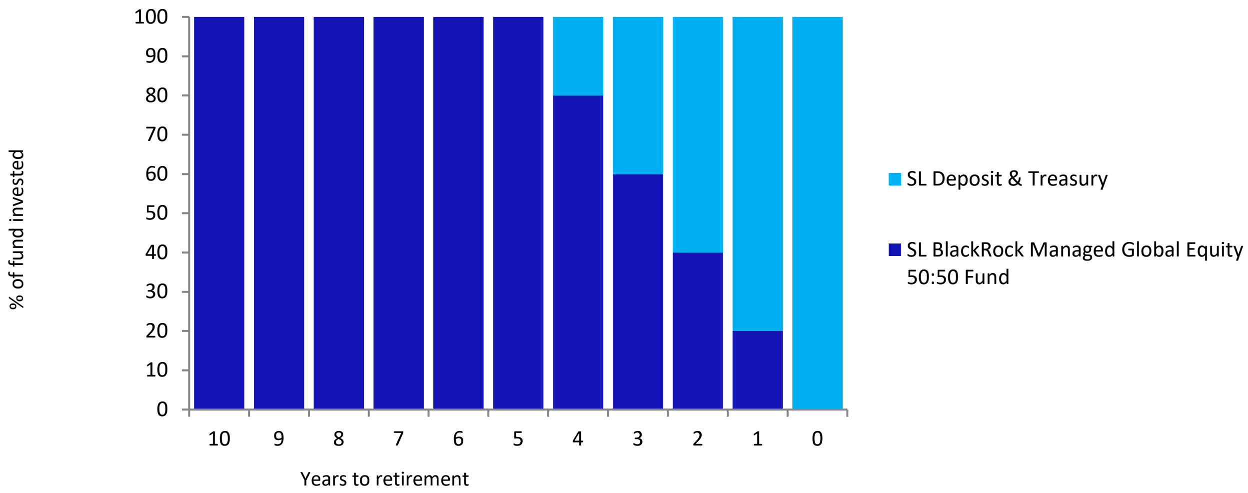
A default investment strategy is one in which members contributions are automatically invested if they do not select their own investment funds from the available range. The DC Category of the Group has been closed to new entrants since 2005 and therefore the Category does not have a default investment strategy as defined by the Regulations i.e. an investment strategy into which members are automatically enrolled. However a strategy can be deemed a default investment strategy if 80% or more of members have chosen to invest in it. Therefore by this measure the Prudential Discretionary Fund, which had more than 80% of members invested in it, is the deemed default investment strategy for the MEPS Category.

The AVC arrangements do not have a default investment strategy, as defined by the Regulations. However the AVC arrangements with Aviva and Standard Life each has a lifestyle strategy, into which members' AVCs are invested, if members do not choose alternative funds and these may therefore be considered to be defaults in a more general sense. The structures of these lifestyle strategies are illustrated in the charts below.

Aviva My Future Target Cash Lump Sum Lifestyle Strategy:



Standard Life EON Lifestyle Strategy



Both lifestyle strategies aim to provide the greater opportunity for growth whilst members are further away from retirement age. They then reduce investment risk by switching from 'growth' investments to lower risk investments during the approach to the member's selected retirement age. At retirement the way both strategies are invested is well suited to members who take their AVC funds as a cash lump sum.

The investment options available to members of the DC Categories and the AVC arrangements are reviewed by the Group Trustees on an annual basis to ensure they continue to meet the needs of most members. The review considers provider financial strength and the quality and suitability of investment options including liquidity, fund performance and charges. The last reviews of the DC Categories and the AVC arrangements were carried out on 10 June 2020.

During the second half of 2019 and the first half of 2020, the Group Trustees carried out a full review of the market to select a Master Trust to which the assets of the DC Categories would be transferred. More details about this are included in the value assessment section of this Statement.

The Group Trustees also carried out a full market review of potential AVC providers, to determine if there was scope to improve value for members. As a result of the market review, the Group Trustees established a new AVC arrangement with Aviva and this was made available to members during the third quarter of 2020, as planned. Again, more details about this are included in the value assessment section of this Statement.

Processing of Core Financial Transactions

The Group Trustees have a specific duty to ensure that core financial transactions are processed promptly and accurately. These include, but are not limited to:

- Investing DC/AVC contributions in the Group,
- Transferring assets relating to members into and out of the Group,
- Transferring assets relating to members between different investments within the Group, and
- Making payments from the Group to or on behalf of members.

In practice, the Group Trustees delegate responsibility for this to the Group administrators, RPMI. The Group Trustees have a service level agreement in place with RPMI and this covers payment of contributions, transfers in or out of the Group, and settlement of benefits. The Group Trustees receive regular communications on core financial transactions from RPMI via quarterly stewardship reports, which are reviewed in detail by the Group Trustees' Audit Committee.

The transfer of assets between different investments within the Group (fund switches) are actioned by RPMI at members' request for the arrangements where members do not have online access to their policy (this applies to the EGPS Category and the legacy Aviva, Royal London and Utmost Life and Pensions AVC arrangements). RPMI do not currently report on fund switch transactions. The Group Trustees have considered whether RPMI should report on fund switches and concluded that, as members of these arrangements switch funds very rarely, the transaction reporting that is in place is appropriate.

The Group Trustees can confirm that all core financial transactions included within the agreement they have in place with RPMI under their remit as administrator over the period covered by this Statement have been processed promptly, accurately and in accordance with agreed service levels.

Charges and transaction costs paid by members

The Group Trustees regularly monitor:

(i) explicit charges such as the Annual Management Charge ('AMC') and additional expenses that are disclosed by fund managers which when added to the AMC, make up the Total Expense Ratio ('TER') and
(ii) transaction costs (i.e. the costs of buying and selling investments in the fund) which are paid by members.

Where information about member charges and costs is not available for whatever reason, the Group Trustees have to disclose this, together with an explanation of what steps are being taken to obtain the information.

The 'deemed default' for the MEPS Category (the Prudential Discretionary Fund) is subject to the charge cap of 0.75% p.a. The Prudential Discretionary Fund complied with the charge cap throughout the period covered by this statement.

The AMC, TER, and transaction costs for the funds held by members of the MEPS Category and the EGPS Category are shown in the tables below. This information has been supplied by the providers. Transaction costs shown are the latest available at the time of writing this statement. These are for the 12-month period to 31 December 2020 for the MEPS Category and for the 12-month period to 31 March 2021 for the EGPS Category.

Members were only invested in these funds up until the transfer to the Master Trust took place, in January 2021.

MEPS Category (Prudential DC arrangement)	**AMC (% p.a.)**	**TER (% p.a.)**	**Transaction costs (% p.a.) (12m to 31/12/2020)**
Cash	0.55	0.55	0.00
Discretionary	0.75	0.75	0.17
Fixed Interest	0.65	0.65	-0.24
Index Linked	0.65	0.65	0.13
Property	0.75	1.32	0.02

EGPS Category (AEGON DC arrangement)	**AMC (% p.a.)**	**TER (% p.a.)**	**Transaction costs (% p.a.) (12m to 31/03/2021)**
DC Balanced Growth	0.75	0.75	0.16
DC 70/30 Global Growth	0.75	0.75	0.18
DC Cash	0.30	0.33	0.01
DC Pre-Retirement	0.50	0.50	0.04

The AMC, TER and transaction costs for the funds held by members of the AVC arrangements, where they are disclosed by the providers, are shown in table below.

Transaction costs shown are the latest available at the time of writing this statement. These are for the 12-month period to 31 December 2020 for all AVC arrangements, except Standard Life and Utmost Life and Pensions, for which transaction costs are for the 12-month period to 31 March 2021.

Members may not have been invested in funds throughout this period, as the 'new' Aviva funds were only available from September 2020, and members' existing funds were transferred from Prudential, Royal London, Standard Life and Utmost Life and Pensions to the new Aviva funds during Q4 2020.

Aviva have not provided any transaction costs for the 'legacy' AVC arrangement, or for the BlackRock Corporate Bond All Stocks Tracker Fund in the 'new' arrangement. The Group Trustees will continue to request this information from Aviva, and remind Aviva that provision of this information is a regulatory requirement.

'New' Aviva AVC arrangement	AMC (% p.a.)	TER (% p.a.)	Transaction costs (% p.a.) (12m to 31/12/2020)
My Future Cash Lump Sum lifestyle strategy	0.38	0.38	0.09 - 0.20[1]
BlackRock (50:50) Global Equity	0.32	0.32	0.13
BlackRock All Stocks UK Gilt	0.32	0.32	0.00
BlackRock Corporate Bond All Stocks	0.32	0.32	Not available
BlackRock European Equity	0.32	0.32	0.11
BlackRock Japanese Equity	0.32	0.32	0.15
BlackRock Pacific Rim Equity	0.32	0.32	0.09
BlackRock Sterling Liquidity	0.32	0.32	0.01
BlackRock UK Equity	0.32	0.32	0.42
BlackRock US Equity	0.32	0.32	0.10
BlackRock World (Ex-UK) Equity	0.32	0.32	0.07
Global Equity	0.42	0.45	0.18
Multi-Asset Growth	0.42	0.42	0.03
Stewardship Managed	0.42	0.42	0.21
UK Equity	0.42	0.42	0.28

Standard Life AVC arrangement	AMC (% p.a.)	TER (% p.a.)	Transaction costs (% p.a.) (12m to 31/03/2021)
E.ON Lifestyle Strategy	0.60	0.61 – 0.62[1]	0.07 – 0.15[1]
Aberdeen Life Sterling Credit	0.95	1.05	0.00
Annuity Targeting	0.60	0.61	0.09
Asia Pacific ex Japan Equity	0.60	0.72	0.00
At Retirement (Multi Asset Universal)	0.60	0.64	0.22
Baillie Gifford UK and Worldwide Equity	0.90	0.93	0.21
Baillie Gifford UK Equity Core	0.90	0.93	0.11
BlackRock Managed (50:50) Global Equity	0.60	0.62	0.15
BNY Mellon UK Equity	0.90	1.02	0.09
Deposit & Treasury	0.60	0.61	0.07
Ethical	0.60	0.61	0.21[2]
European Equity	0.60	0.62	0.06
Far East Equity	0.60	0.68	0.12
FTSE Tracker	0.60	0.61	0.08
Global Equity 50:50	0.60	0.61	0.41
Index Linked Bond	0.60	0.61	0.11
International Equity	0.60	0.63	0.11
iShares UK Equity Index	0.60	0.62	0.38
Japanese Equity	0.60	0.63	0.16
Managed	0.60	0.62	0.16
Mixed Bond	0.60	0.61	0.06
Multi Asset Managed (20-60% Shares)	0.60	0.62	0.15
Money Market	0.60	0.61	0.00
North American Equity	0.60	0.61	0.09[2]
Property	0.60	0.63	0.17
Aberdeen Standard Investments Global Absolute Return Strategies	1.02	1.12	0.74
Stock Exchange	0.60	0.63	0.11
UK Equity	0.60	0.61	0.15
Pension With Profits Fund	1.75	1.75	0.14[2]

Aviva AVC arrangement	AMC (% p.a.)	TER (% p.a.)	Transaction costs (% p.a.)
Long Gilt	0.875	0.875	Not available
Mixed Investments (40-85% Shares)	0.875	0.875	Not available
UK Equity	0.875	0.875	Not available
With Profits Guaranteed	Not applicable[3]		Not available
With Profits Series 1	Not applicable[3]		Not available
With Profits (CGNU)	Not applicable[3]		Not available

Prudential AVC arrangement	AMC (% p.a.)	TER (% p.a.)	Transaction costs (% p.a.) (12m to 31/12/2020)
Deposit	Not applicable[4]	Not applicable[4]	0.00
Discretionary	0.75	0.78	0.17
Fixed Interest	0.75	0.76	0.00
Global Equity	0.75	0.76	0.12
International Equity	0.75	0.76	0.21
UK Equity Passive	0.65	0.66	0.07
UK Equity	0.75	0.76	0.02
With Profits	0.8 (estimate)[3]	0.98 (estimate)[3]	0.13

Royal London AVC arrangement	AMC (% p.a.)	TER (% p.a.)	Transaction costs (% p.a.) (12m to 31/12/2020)
E.ON Lifestyle Strategy	0.59	0.59	0.00 – 0.01[1]
BlackRock ACS Global Equity Index (50:50)	0.59	0.59	0.01
BlackRock ACS UK Equity Index	0.59	0.59	0.00
Deposit	0.59	0.59	0.00
Index Linked	0.59	0.59	0.00
Sustainable Leaders	0.59	0.59	0.41

Utmost Life and Pensions (formerly Equitable Life) AVC arrangement	AMC (% p.a.)	TER (% p.a.)	Transaction costs (% p.a.) (12m to 31/03/2021)
Secure Cash	0.50	0.50	0.00[5]
Multi-Asset Moderate	0.75	0.75	0.41
Multi-Asset Cautious	0.75	0.75	0.50

Notes

[1] Depending upon term to retirement.

[2] Although not all the data required to calculate the transaction costs for these funds was obtainable from the fund managers, less than 0.1% was missing.

[3] The charges on these With Profits Funds are not explicit, they are taken into account when the bonus on the Funds is declared. Standard Life estimates the charges on the Pension With Profits Fund are 1.75% p.a.; Prudential estimates the charges on the With Profits Fund are 0.98% assuming investment returns on the underlying assets are 5% p.a. Aviva does not provide any indication of the level of charges on its With Profits Funds.

[4] There are no explicit charges on the Prudential Deposit Fund, this Fund aims to provide a net return in line with the Bank of England base rate.

[5] The Secure Cash Fund was a temporary holding for assets transferred from the Equitable Life With Profits Fund. It closed on 31 December 2020 therefore the transaction costs shown are for the 12-month period to 31 December 2020.

The prescribed method of calculating transaction costs states the trading cost is arrived at by comparing the price at which the transaction was actually executed with the price when the order to transact entered the market. So, when selling into a rising market or buying into a falling market, the calculation produces a credit that may outweigh the other 'explicit' transaction costs, resulting in negative overall transaction costs. We have set any negative transaction costs to zero in this statement to avoid potentially understating costs.

Illustrations to show the cumulative effect of costs and charges

The Regulations require the Group Trustees to illustrate the effect of the costs and charges typically paid by a member on the value of their DC fund at retirement (as a "pounds and pence figure").

The Group Trustees have taken account of the statutory guidance and have sought legal advice on this matter. As the DC funds are no longer in the Group, the Group Trustees have concluded it would be misleading to members to illustrate the effect of future costs and charges on DC funds. For this reason, this statement does not include any illustrations. Former members of the DC Categories will be able to check the effect of costs and charges on their funds within the Aviva Master Trust via the Chair's Statement for the Aviva Master Trust.

Value assessment

The Regulations require that the Group Trustees make an assessment of charges and transactions costs borne by members and the extent to which those charges and costs represent good value for money for members. In previous years, the Group Trustees have used a cost-benefit analysis framework in order to assess whether the member borne charges and transaction costs deliver good value for members. The Group Trustees have not carried out this cost-benefit analysis for the period covered by this statement, as they had already identified that the bulk transfer of funds from the Group to the Aviva Master Trust, which applied to all members with assets in the Categories and was concluded in January 2021, was likely to improve value for members.

The key ways in which the transfer to the Master Trust had the potential to improve value for members were identified as:

- Economies of scale - the far larger size of the Master Trust means that it is able to provide investment funds at a lower cost to members than the Group can.

- Direct access to the pension freedoms options at retirement - The Master Trust has the systems to be able to offer members full access to the pension freedoms so, for example, members are able to drawdown income from their fund within the Master Trust when they take benefits, if they wish, and their funds will remain subject to the competitive charges negotiated for the arrangement at outset by the Group Trustees.
- Access to information – members are able to register to access details of their pension fund and make changes online or using the Aviva App.

As a result of the benchmarking exercise they carried out on the AVC arrangements, and the subsequent provider review, the Group Trustees identified there was potential to improve value for AVC members by appointing a new AVC provider. The Group Trustees appointed Aviva to provide the new AVC arrangement. It has the potential to improve value for members as it is subject to lower charges than the Group's other AVC arrangements and provides access to a range of investment options recommended by the Group Trustees' investment advisers. All AVCs have been paid to this new arrangement since the August 2020 payroll. Members were also offered the opportunity to transfer existing funds to the new Aviva arrangement.

Trustee Knowledge and Understanding

The law requires Trustees to have, or have access to, sufficient knowledge and understanding to properly exercise their functions as Trustees and to run the Scheme effectively. These requirements are set out in Sections 247 and 248 of the Pensions Act 2004.

The Chair of the Group Trustees is an experienced pension professional who has acted as a trustee for more than ten years across a number of different pension schemes with DC sections.

Over the period covered by this Statement, the key focus of the Group Trustees has been the completion of a project to implement the outcome of a review of the current DC and AVC arrangements, including the transfer of the assets of the DC Categories to the Aviva Master Trust and the establishment of a new AVC arrangement with Aviva. The Group Trustees sought extensive investment and legal advice throughout this project.

The Group Trustees take their training and development responsibilities seriously. We maintain a training log and all Group Trustees are encouraged to identify any gaps in their knowledge and work with the pensions team, professional advisers and external agencies to fill any gaps. All Group Trustees have completed the Pensions Regulator’s Trustee Toolkit.

As a result of the training activities which have been completed by the Group Trustees individually and collectively as a board and taking into account the professional advice available to the Group Trustees, I am confident that the combined knowledge and understanding of the Group Trustees enables them to exercise their functions properly.

Signed on behalf of the Group Trustees on 26 August 2021

Martine Trouard-Riolle
On behalf of Capital Cranfield Pension Trustees Limited – Chair of the Group Trustees

Appendix

E.ON UK GROUP OF THE ESPS (THE 'GROUP')
STATEMENT OF INVESTMENT PRINCIPLES – DEFINED CONTRIBUTION ARRANGEMENTS

The following document outlines the Group's Statement of Investment Principles (SIP), which sets out the investment objective, the investment strategy, the Group Trustees approach to risk management, issues concerning implementation of the strategy and the policy on governance for the Money Purchase arrangements within the Group. This covers both the Defined Contribution Sections of the Group and the Additional Voluntary Contributions (AVCs) arrangements under the Defined Benefit Section.

1. INVESTMENT OBJECTIVE

The Group has two Defined Contribution categories; the EGPS Category which uses AEGON (formerly BlackRock) as its provider and the MEPS Category which uses Prudential. The Group also makes AVC arrangements available to final salary members of the Defined Benefit category. The Group Trustees maintain a similar approach to AVCs to that for Defined Contribution categories, particularly in respect to the selection and monitoring of investments.

The Group Trustees are responsible for investing the Money Purchase assets in line with members' preferences. Its key aim is to provide a range of investments that are suitable for meeting members' long and short term investment objectives allowing for members' differing individual circumstances. In particular, the range of members' attitudes to risk and term to retirement are considered.

In preparing this statement, the Group Trustees have consulted with E.ON UK plc ('the Sponsoring Employer') and obtained and considered advice from its investment adviser, Aon Hewitt Limited ('Aon'), on the appropriateness of this statement. Aon is authorised and regulated by the Financial Conduct Authority in respect of a range of investment business activities.

In accordance with The Occupational Pension Schemes (Investment) Regulations 2005 the statement is reviewed:

- At least every three years; and
- Without any delay after any significant change in investment policy or the demographic profile of relevant members.

2. STRATEGY

The Group Trustees policy is to provide suitable information for members so that they can make appropriate investment decisions. Members are responsible for selecting the fund or combination of funds in which they wish to invest their pension accounts from the available range.

The 'Group Trustees use fund platforms provided by AEGON and Prudential for the Defined Contribution Sections to implement the Group's objectives.

BlackRock Platform (EGPS Category)	
Fund	**Benchmark**
BlackRock Balanced Fund	Fixed Weight Benchmark[1]
BlackRock 70/30 Global Fund	70% FTSE All Share Index / 30% Fixed Overseas[2]
BlackRock Cash Fund	7 Day LIBID
BlackRock DC Pre-Retirement Fund	Composite Benchmark[3]
BlackRock DC Diversified Growth Fund	Bank of England official Bank Rate plus 3.5%
BlackRock DC Long Gilt Fund	FTSE A Over 15 Year Gilts Index
BlackRock LGIM Consensus Fund	ABI Mixed Investments 40 -85% shares sector average
BlackRock LGIM Global Equity 50:50 Index Fund	50% FTSE All Share Index, 17.5% FTSE All World North America Index, 17.5% FTSE All World Europe (ex UK) Index, 8.75% FTSE All World Japan Index, 6.25% FTSE All World Asia Pacific (ex Japan) Index

[1] 55% FTSE All-Share TR Index, 10% FTA All Stocks Gilts Index 10%, 8% FTSE World Europe ex UK Gross Return (GBP), 8% FTSE World US TR in GBP Terms, 5%, Barclays Global Agg 500 Ex GBP (GBP), 5% LIBID 7 Day GBP, 4%, FTSE World Pacific Ex Japan (GBP), 4% FTSE JAPAN INDEX (GBP), 1% MSCI Emerging Markets Gross Returns (GBP).
[2] Overseas Weights: 10% Continental Europe, 10% North America, 5% Japan, 4% Pacific Basin, 1% Emerging Markets
[3] The benchmark and the underlying investment strategy take into account a number of factors including current expected longevity of immediate annuitants, the yields available in the corporate bond market and the types of annuities generally purchased by defined contribution pension investors in the UK. The constituents of the benchmark and consequently the investment strategy are subject to an annual review and may be updated to include other factors.

Prudential Platform (MEPS Category)	
Fund	**Benchmark**
Prudential Discretionary	Internal composite benchmark[1]
Prudential Cash	London Interbank LIBID 7 Day Deposit Rate
Prudential Property	All Balanced Property Fund component of the AREF / IPD UK Quarterly Property Fund Index
Prudential Index Linked	FTSE Actuaries UK Index-Linked Gilts Over 5 Years Index
Prudential Fixed Interest	FTSE Actuaries UK Conventional Gilts All Stocks Index
Prudential International Equity	Internal composite benchmark[2]
Prudential UK Equity	FTSE All-Share Index
Prudential World ex-UK Index	FTSE All-World Developed ex-UK Index
Prudential BlackRock Consensus	CAPS Pooled Fund Survey Balanced Fund asset weights excluding property and emerging markets
Prudential BlackRock 50:50 Global Equity	Composite Benchmark[3]
Prudential BlackRock Over 15 Years UK Gilt Index Fund	FTSE Actuaries UK Conventional Gilts Over 15 Years Index
Prudential Absolute Return Fund	UK CPI + 5%p.a.

[1] benchmark asset allocation 67.5% global equities (split 40/60% UK/ overseas); 7.5% property; 25% bonds/cash
[2] benchmark asset allocation 26.7% North America; 26.7% Europe; 26.7% Pacific Basin; 11.7% Japan; 8.3% Emerging markets
[3] 50% FTSE All-Share Index TR, 16.5% FTSE United States Index in GBP, 16.5% FTSE All-World Developed Europe ex-UK Index NET of Tax GBP, 8.5% FTSE All-World Developed Japan Index NET of Tax GBP, 8.5% FTSE All-World Developed Asia Pacific ex Japan Index NET of Tax GBP.

In addition, the Group Trustees have made available a lifestyle option for the MEPS category:

- >5 years to retirement monies are invested 100% in the BlackRock 50:50 Global Equity Index, and
- < 5 years to retirement monies are switched and rebalanced 75% into the BlackRock Over 15 years UK Gilt Index Fund and 25% into the Prudential Cash Fund.

The Group Trustees operate a number of AVC policies for final salary members of the Defined Benefit category. The AVC policy available to new AVC payers is provided by Standard Life and offers a broad range of funds including the following lifestyle option, which is the default investment strategy for this arrangement:

- > 5 years to retirement monies are invested 100% in the BlackRock Managed Global Equity 50/50 Fund, and
- < 5 years to retirement monies are switched and rebalanced into the Deposit and Treasury Fund so that at retirement 100% of the fund is invested in this fund.

The range of funds, including the lifestyle option, was chosen by the Group Trustees after taking advice from their investment adviser, Aon. In choosing the Group's investment options, it is the Group Trustees policy to consider:

- A full range of asset classes.
- The suitability of the possible styles of investment management and the need for manager diversification.
- The suitability of each asset class for a defined contribution scheme / money purchase arrangement.
- The need for appropriate diversification of asset classes.
- The current and expected future membership of each Section of the 'Group.

3. DEFAULT INVESTMENT STRATEGIES

The Defined Contribution Section of the Group is closed to new entrants.

There are no contributions being made to the EGPS Category and therefore the Group Trustees have not designated a default arrangement for this Category.

Within the MEPS Category, at 6 April 2015 over 80% of members were contributing to the Prudential Discretionary Fund, and therefore this is considered as the default investment arrangement. This fund is reviewed as part of the Group Trustees' annual review of the money purchase arrangements.

The lifestyle option for the Standard Life AVC policy is also reviewed as part of the Group Trustees annual review of the money purchase arrangements.

4. RISK MEASUREMENT AND MANAGEMENT

The Group Trustees consider the following sources of risk:

- Member Understanding – the risk that the Group Trustees do not provide clear, balanced and timely information to members to aid their understanding. The Group Trustees are aware that poor information could lead to members' reasonable expectations not being met.

- Investment Practices – the risk that the range of funds does not meet members' requirements. The range of funds is monitored for both suitability and competitiveness on an ongoing basis.

- Risk of default funds, where provided, being unsuitable for the requirements of some members.

- Manager risk – the risk of fund managers not meeting their objectives. This risk is considered by the Group Trustees and their advisors both upon the initial appointment of the fund manager and on an ongoing basis thereafter.

- The risk of fraud, poor advice or acts of negligence ("operational risk"). The Group Trustees have sought to minimise such risk by ensuring that all advisors and third party service providers are suitably qualified and experienced and that suitable liquidity and compensation clauses are included in all contracts for professional services received.

Due to the complex and interrelated nature of these risks, the Group Trustees consider these risks in a qualitative rather than quantitative manner as part of each formal strategy review. The Group Trustees policy is to review the range of funds offered and the suitability of its approach to a default strategy at least every three years.

These risks are considered as part of each normal strategy review. In addition, the 'Group Trustees measure risk in terms of performance of the assets compared with the benchmarks on a regular basis (at least annually) along with monitoring any significant issues with the fund managers that may impact their ability to meet the performance targets set by the Group Trustees.

5. IMPLEMENTATION

The range of funds available to EGPS Category members is provided through AEGON and to MEPS Category members through Prudential. There is also a range of AVC options from providers selected and monitored by the Group Trustees.

The AEGON and Prudential policies provide funds which are managed using both active and passive approaches. Active management means that they make decisions on the appropriate asset mix and selection of the securities within each fund. Active management may result in periods of out and under performance of the investment markets as a whole. Passive management involves holding a large proportion of the securities in the markets in line with the market weight of each security and should match closely the performance of the investment markets as a whole.

6. GOVERNANCE

The Group Trustees are responsible for the investment of the Group's assets. The Group Trustees take some decisions themselves and delegates others. When deciding which decisions to take themselves and which to delegate, the Group Trustees have taken into account whether it has the appropriate training and expertise in order to take an informed decision. The Group Trustees have established the following decision making structure:

<table>
<tr><td colspan="2">Group Trustees
• Monitor actual returns versus Group investment objective.
• Set structures and processes for carrying out its role.
• Select and monitor planned asset allocation strategy.
• Select and monitor direct investments.
• Select investment advisers and fund managers.
• Decide on appropriate structure for implementing investment strategy.
• Monitor investment advisers and fund managers.
• Make ongoing decisions relevant to the operational principles of the Group's investment strategy.
• Reviews the ‘money purchase’ fund range and lifestyle options for future contributions.</td></tr>
<tr><td>Investment Advisers
• Advise on all aspects of the investment of the Group's assets, including implementation.
• Advise on this statement.
• Provide any required training.</td><td>Platform Providers
• Manage the allocation of certain of the funds between underlying fund managers, in accordance with agreed benchmarks and rebalancing protocols.
• Operate within the terms of this statement and their written contracts.</td></tr>
</table>

The Group Trustees have established an Investment Committee, whose primary responsibility is to consider all matters related to the implementation of the Group's investment strategy, to take decisions on matters delegated to the Committee by the Board and to make recommendations in respect of matters to be decided by the Board. The membership and terms of reference for the Committee are reviewed from time to time, and include reviewing and monitoring money purchase arrangements.

The Pensions Act 1995 distinguishes between investments where the management is delegated to a fund manager under a written contract and those where a product is purchased directly, e.g. the purchase of an insurance policy or units in a pooled vehicle. The latter are known as direct investments.

The Group Trustees' policy is to review its direct investments and to obtain written advice about them at regular intervals (normally annually). These include vehicles available for members' DC contributions and AVCs. When deciding whether or not to make any new direct investments the Group Trustees will obtain written advice and consider whether future decisions about those investments should be delegated to the fund managers.

The written advice will consider the issues set out in the Occupational Pension Schemes (Investment) Regulations 2005 and the principles contained in this statement. The regulations require all investments to be considered by the Group Trustees (or, to the extent delegated, by the fund managers) against the following criteria:

- The best interests of the members and beneficiaries
- Security
- Quality
- Liquidity
- Profitability
- Nature and duration of liabilities
- Tradability on regulated markets
- Diversification
- Use of derivatives

7. RELATIONSHIP WITH ADVISERS

Aon Hewitt Limited (Aon) has been selected as investment adviser to the Group Trustees for money purchase arrangements. It operates under an agreement to provide a service which ensures the Group Trustees are fully briefed to take decisions itself and to monitor those it delegates.

Aon has the knowledge and experience required under the Pensions Act 1995.

The Group Trustees expect the Providers to handle the assets delegated to them under the terms of the contract and to give effect to the principles in this statement so far as is reasonably practicable.

8. SOCIAL, ENVIRONMENTAL AND ETHICAL CONSIDERATIONS

The Group Trustees' primary consideration in formulating the investment options is to act in the best financial interests of the members of the Group, and to seek the best return that is consistent with taking a prudent/appropriate level of risk. However, the Group Trustees recognise that social, environmental and ethical considerations can have an impact on financial performance.

The Group Trustees have a long-term time horizon in relation to the Group’s investment strategy and therefore acknowledge the importance of being a responsible investor. The Group Trustees consider responsible investment to be the integration of environmental, social and governance considerations into investment decisions in respect of the Group’s investment portfolio where financial risk and / or return is, or could be, materially affected.

In setting and implementing the Group's investment strategy, the Group Trustees do not explicitly take into account the views of members and beneficiaries in relation to ethical considerations, social and environmental impact or present and future quality of life matters (defined as 'non-financial matters').

The Group assets are typically held in pooled arrangements, managed by investment managers who are in a position to exert significant influence on the companies in which they invest on the Group’s behalf.

The Group Trustees therefore expect the appointed investment managers to integrate social, environmental and governance considerations (including, but not limited to, climate change) and opportunities within their investment process as applied to the assets of the Group.
In relation to corporate governance and activism (including the way in which any rights attaching to investments, such as voting rights, are exercised) the Group Trustees support the policies set out in the Myners’ Report and Statement of Principles drawn up by the Institutional Shareholders’ Committee and expect UK-regulated investment managers to comply with these principles where possible.

9. EXERCISE OF RIGHTS

The Group Trustees believe that the exercise of rights (including voting rights) attaching to investments should be exercised by each investment manager, to whom the day to day responsibilities have been delegated, in the interests of investors. The Trustee believes that this will ultimately be in the best interests of the members.

10. REALISATION OF INVESTMENTS

The Group's assets are invested in daily priced pooled investment funds, and the vast majority of the underlying assets are invested in quoted markets. The platform provider can be required to realise investments as soon as it becomes appropriate to do so.

11. REVIEW

The Group Trustees will review this Statement at least every three years and immediately following any significant change in investment policy or the demographic profile of relevant members. The Group Trustees will take investment advice and consult with the Sponsoring Employer over any changes to this Statement.

Dated: 25 July 2019
Signed:

Martine Trouard-Riolle
On behalf of Capital Cranfield Pension Trustees Limited - Chair of the Trustee

E.ON UK Group of the ESPS
Implementation Statement for the year ended 31 March 2021

Introduction

This implementation statement is a new addition to the Annual Report and Financial Statements, required by new pensions regulations. The Trustee of the E.ON UK Group of the ESPS (the 'Scheme') has prepared this statement to provide stakeholders with a transparent and accurate review of how we have acted in line with the stewardship and engagement policies set out in the Statement of Investment Principles during the accounting year.

This statement is intended to improve accountability, highlighting the proactive steps taken by us and our service providers to ensure members' assets are invested responsibly and for the long-term.

This statement includes details of:

- How we have complied with our stewardship and voting policies as set out in our Statement of Investment Principles ("SIP");
- Any changes we made to our stewardship and voting policies during the year; and
- Specifically, how our investment managers voted and engaged on our behalf.

This statement has been prepared by the Trustee to cover the period 1 April 2020 to 31 March 2021.

The statement is publicly available at https://myeonpension.com/

To the best of our knowledge, the Trustee has followed all of the policies as outlined in the relevant SIP during the reporting period.

Executive Summary

We monitor the voting and engagement activity of all of our investment managers, and, through the support of our Investment Committee and Investment Advisor, challenge their decisions. Some of our managers do not own very many equities or corporate bonds and therefore stewardship is less likely to be relevant or significant.

We focus our efforts on those managers where voting and engagement is material. The policies of those managers are summarised in this statement, along with some examples of the type of activity which took place during the period covered by this Statement.

We also include information on the use of specialist firms (proxy voting services) to support this activity.

Key information regarding managers where voting is deemed material in these areas include:

- The managers participated in 95% of the available voting opportunities
- 1 out of the 6 managers receive advice from proxy voting service providers, with most of the managers retaining the power to vote against their provider's advice
- Within the Niche Asset Portfolio, the managers have participated in 100% of the available voting opportunities.

<u>Section 1 – Our investment policies</u>

Statement of Investment Principles Review

During the reporting year, the Trustee undertook a full review of the Scheme's SIP, which was updated on 30 September 2020. The main change addressed during this review was to update the Trustee's Responsible Investment policy. This section was updated to set more prescriptive requirements for each of the managers (such as becoming signatories to the Principles for Responsible Investment). The revised policy improves accountability and aligns with broader environmental, social and governance initiatives set at a legislative level.

We consider the implementation of the investment policies and the extent to which the Trustee has followed the SIP in the following sections.

What are our investment objectives?

The Trustee aims to invest the assets of the Scheme to achieve a return of 2% p.a. above the return on a Liability Benchmark, taking as little risk as necessary. The Liability Benchmark is a hypothetical portfolio of gilts and inflation swaps designed to match the Scheme's liabilities as closely as possible. The overriding principle guiding the Trustee's approach to investment is to manage both risk and return.

How have we implemented our investment objectives?

The asset allocation strategy the Trustee has selected is designed to minimise downside risk, whilst still aiming to achieve our target investment return, to pay full benefits to members.

We take risk in as diversified a manner as possible by investing across a number of different asset classes, styles of management and investment managers.

We aim to take risks only where we believe that we will receive adequate compensation for taking those risks. As we don't expect to be rewarded for taking large inflation and interest-rate risks, we have decided to use interest-rate and inflation instruments to manage these risks. Unrewarded risk in currency will also be hedged where practical.

What is our Responsible Investment and stewardship policy?

We have a long-term time horizon in relation to the Scheme's investment strategy and therefore acknowledge the importance of being a responsible investor.

We consider Responsible Investment to be the integration of non-financial matters such as environmental, social and governance considerations into investment decisions in respect of the Group's investment portfolio where financial risk and / or return is, or could be, materially affected ("Responsible Investment").

We expect our appointed investment managers to integrate social, environmental and governance considerations (including but not limited to climate change) and opportunities within their investment process as applied to the assets of the Scheme.

How have we implemented our Responsible Investment policy?

We acknowledge that the Scheme has limited direct influence in the implementation of its Responsible Investment policy and has delegated this activity to our chosen underlying asset managers. However, we do believe that we can have a positive influence on our managers and challenge how they approach the investments to ensure that we are aligned, so that non-financial matters such as environmental, social, and governance factors are considered in the investment process.

This is done through our Investment Advisor, who is responsible for engaging with investment managers regarding their voting records and level of engagement with the underlying investments, where this is expected to have meaningful impact.
This does not include the Niche Asset Portfolio, where we monitor their approach directly.

Compliance with our Stewardship Policy

In relation to corporate governance and activism (including the way in which any rights attaching to investments, such as voting rights, are exercised) the Trustee supports the policies set out in the Stewardship Code as published by the Financial Reporting Council and expect:

- UK-regulated investment managers to comply with these principles where possible and be rated Tier 1
- Non-UK regulated managers to exercise their voting rights in a manner consistent with a focus on medium and longer-term investment performance

To the best of our knowledge we have complied with our Stewardship Policy.

We monitor voting and engagement activity of all our investment managers, and, through our Investment Advisor, challenge their activity. We categorise our managers according to how material voting and engagement are in their mandate. Some of our managers don't own very many assets such as equities or corporate bonds and therefore voting or engagement is less likely to be relevant or significant.

We focus our efforts on those managers where voting and engagement is material. The stewardship policies of these managers are summarised briefly below in their own words (we note that we use investment managers based across the world and they may refer to regulations or guidance set in different countries).

Manager	Asset Class	Stewardship Policy (in Manager's own words)
Caxton	Macro Orientated	Caxton views proxy voting as an extension of the investment process. To that end, where the voting of proxies is irrelevant to the investment decision to purchase, hold, or sell a security (or other applicable instrument), Caxton will not vote proxies on behalf of clients (e.g., in connection with quantitative driven strategies). In addition, Caxton generally does not vote proxies with respect to non-US issuers, but may decide to do so depending upon the nature of the proxy. With respect to strategies in which Caxton is required to vote pursuant to its proxy voting policies, Caxton may delegate to an independent proxy voting service the authority to exercise the voting rights associated with client holdings. Any such delegation will be made in accordance with the direction that the votes be exercised in accordance with Caxton's proxy voting policies.
Dorsal	Equity	All proxies are reviewed by the sector heads. The default decision is to vote with management; however, sector heads are reminded each time to let the Director of Compliance know when the decision is to vote against management.
Egerton Capital	Equity	Egerton typically votes in favour of routine housekeeping proposals, including election of directors (where no sustainability factors appear relevant). Egerton typically votes against proposals that make it more difficult to replace board members and may vote against companies that do not publicly disclose their carbon and other GHG emissions and do not have a credible plan for their reduction. Egerton maintains records of votes cast, of reasons for voting against the investee company management's recommendations or for abstaining. Egerton may attend general meetings of companies in which the Funds have a major holding, or write formally to the directors of such companies, where this is considered appropriate and practicable.
Farallon	Multi-Strategy	While Farallon does not consider its approach to be activist, from time to time it will actively engage with management and asset owners, and around investments as required to effect its investment strategy. This engagement may consist of formal or informal engagement with company management as shareholders or as members of creditor committees. Farallon has a proxy voting policy that states that all actions taken with respect to proxies are to be in the best interests of the Farallon Funds and in accordance with Farallon's proxy voting policy. The policy includes guidelines on corporate governance issues; voting, board composition and control issues; compensation issues; and other matters.
Sands	Equity	Sands' policy is to vote client proxies in the best interest of its clients. Proxies are an asset of a client, which must be treated by Sands with the same care, diligence and loyalty as any asset belonging to a client. In voting proxies Sands should consider the short- and long-term implications of each proposal. In voting proxies, Sands typically is neither an activist in corporate governance nor an automatic supporter of management. However, because Sands believes that the management teams of most companies it invests in generally seek to serve shareholder interests, Sands believes that voting proxy proposals in the client's best economic interests usually means voting with the recommendations of these management teams.
Snow Lake	Equity	Snow Lake Capital (HK) Limited ("SLC") aims to make proxy voting decisions that preserve and enhance the economic value of our positions in securities. In general, SLC will make proxy voting decisions for any Conviction Level 3 long position (defined as more than 8% of Gross Asset Value of the corresponding fund portfolio), upon receiving proxy voting notice. For the long positions subject to voting according to the abovementioned rule, the portfolio manager will be requested to submit voting rationale to the SLC ESG Committee even if the decision is to abstain.

In addition, we held funds with the following managers, but either there was no direct exposure to equities or the proportion of equities held was very low (less than 5%) and/or the holding period was very short, and we therefore focus less on these managers' voting and engagement. The managers also held during the financial year were as follows:

- Bridgewater
- Capula
- GoldenTree
- Insight – synthetic equities
- Lyxor SocGen
- Rialto
- Two Sigma Risk Premia
- Invesco
- Wellington
- Winton

The Scheme also invests in a Niche Asset Portfolio. Most of the strategies in this portfolio are Private Market investments and own controlling stakes in the underlying businesses, meaning that stewardship and engagement is evidenced in a much broader way than in the public sphere. A critical means of value creation for many private strategies is (for example) ensuring that each business has the best governance possible – dictating and controlling the policies and make up of senior leadership (as opposed to indirect influence through voting). Engagement is, therefore, highly relevant in some cases and we include some examples in the relevant section of this report.

More information on the Niche Asset Portfolio is provided in Section 4.

Section 2 – How our shares were voted

How the investment managers voted

Manager	Average % Scheme assets	Number of potential votes	Proportion of votes cast	For	Against	Abstain
Caxton	2.9%	*10,533*	*96%*	*9,202*	*910*	*0*
Dorsal	0.1%	*167*	*100%*	*167*	*0*	*0*
Egerton Capital	9.8%	*500*	*64%*	*302*	*1*	*17*
Farallon	4.7%	*835*	*99%*	*784*	*38*	*7*
Sands	1.0%	*381*	*94%*	*329*	*18*	*10*
Snow Lake[1]	1.3%	*0*	-	-	-	-

Use of proxy voting services

Proxy voting services are specialist firms that provide an outsourced voting service. Some investment managers choose to use these services (rather than vote themselves). The reasons for using a proxy voting services could include:

- The investment manager lacks the resource to research each vote and submit votes
- The manager wants to follow a recognised code of practice and the proxy voting service is an easy way to implement this

[1] Snow Lake started their stewardship code and new voting policy in 2021 and thus no active voting was made for year 2020

Using a proxy voting service does not necessary mean that voting is done poorly. In fact, many professional proxy voting services are able to devote significant resource to researching AGM motions and are able to follow best practice guides like the FRC's Stewardship Code.

Although there could be concern that proxy voting may signal disinterest, this is not a material concern, as the managers using these services set parameters reflecting their own beliefs.

The table below outlines the use of proxy voting services by the Scheme's investment managers where voting is deemed to be of material importance (using each investment manager's own words):

Manager	Use of proxy voting service	Comment
Caxton	Yes - ISS	Caxton has provided ISS with general proxy voting guidelines to be applied absent contrary instructions from authorized representatives of Caxton. ISS assists in the proxy voting and corporate governance oversight process by developing and updating its own proxy voting guidelines.
Dorsal	No	Dorsal do not employ the services of a proxy service, however, they monitor the recommendations of the major proxy consultants.
Egerton Capital	No	Third-party tools like Proxy Edge and Proxy Vote are used to cast votes, but Egerton does not utilise the services of any other third party (e.g. for advice or monitoring) and therefore remains able to properly exercise its stewardship responsibilities.
Farallon	No	Farallon votes proxies, but considers the recommendations of proxy advisors such as Glass Lewis in their voting decisions.
Sands	No	Sands votes proxies, but considers the recommendations of proxy advisors such as ISS and Glass Lewis in their voting decisions.
Snow Lake	No	Snow Lake do not intend on appointing a proxy voting advisor.

Examples of significant votes cast

Manager	Significant votes cast	Rationale/ Comment
Egerton	Egerton voted with a shareholder proposal for a climate assessment report, against the recommendation of management.	Egerton's view was that a vote against management was justified on the grounds of ESG considerations
Farallon	PG&E Corporation (PCG) - Vote to approve debtors' bankruptcy reorganisation plan.	Farallon voted to approve the debtor companies' revised bankruptcy plan because compared to earlier proposals, the revised plan reflected materially improved recoveries for bondholders, trade claim holders and wildfire victims. The ad hoc bondholders group, in which Farallon participated, proposed an alternative plan that catalysed the debtors to significantly raise compensation allocated to creditors.
Sands	Localiza Rent A Car SA – Vote for Installation of Fiscal Council	Sands agreed with ISS that the installation of a Fiscal Council should help improve corporate governance at the firm.

Section 3 – How our managers have engaged in respect of the investments held

Engagement is considered to be purposeful dialogue with a specific and targeted objective to achieve positive change in the interests of beneficiaries, thereby a key action required for delivering good stewardship.

The table below summarises examples of engagement activity of the Scheme's investment managers where engagement should be a material activity in the management of the assets (using each investment manager's own words).

Public market investments

Manager	Engagement activity (in Manager's words)
Wellington	Constructive engagement with issuers is the most effective way to improve ESG characteristics over time. For emerging markets sovereigns, environmental, social, and governance (ESG) factors have long been embedded in Wellington's country research process used to assess the relative credit strength of all the countries under our research coverage. **Mexican Quasi-Sovereign in energy sector** We leveraged Wellington Management's Climate Exposure Risk Application (CERA) to conduct an in-depth, bottom-up climate analysis. In CERA users can visualize and analyse climate risk of a variety of entities across multiple asset classes. The company has a potential climate change risk exposure to drought. Part of the company's operations includes refining petroleum and natural gas which requires large amounts of water. Drought near these operations can increase current costs for water and can introduce new costs in obtaining water through practices such as desalination. The company's operations in the centre and north of Mexico are the most at risk to experience more drought. The company does not disclose awareness of this risk, but instead focuses on risks associated with open sea drilling. Based on our analysis, we identify some drought risk but believe the company should be geographically diverse enough to avoid material climate risks.
Sands	**Globant SA** After speaking with the company we've decided to vote against the proposed amendment to Article 10.2 and engage with management further on this issue. The proposal would lower the cut off date to propose a new agenda item ahead of the shareholders' meeting from 22 days to 5 days. This change is being done to be in compliance with the Luxembourg Company Law that governs the business and is something we'd support for our clients in isolation The proposal would also increase the ownership threshold to propose an agenda item from 5% to 10%. This appears to be shifting to the minimum requirement to comply with this law. Globant's explanation is that their standard operating procedure has been to default to exactly what the law recommends in order to keep their operations simple, particularly when peers incorporated in Luxembourg do the same (they gave the example of Shopify). While we believe this likely made sense when Globant was a smaller company, we don't believe this practice is still uniformly appropriate for Globant or in our clients' best interests in this case. Although we're voting against this item we don't see any serious governance red flags. This sounds like a SMID cap company that is getting used to having institutional shareholders and really hasn't given these governance processes issues too much thought in the past.

GoldenTree	**PG&E** GoldenTree incorporated both environmental and social factors into its investment thesis for PG&E (a critical utility for California). GoldenTree played an important role as one of the largest backstop equity providers as well as helping structure multiple legal and financial attributes. With a more sustainable balance sheet, new equity capital, and support from various stakeholders, PG&E is now in a better position to deliver positive operating performance as well as take proactive steps from an environmental and social perspective. As an example, wildfire mitigation is a key component of the company's operational and safety improvement plan. PG&E is hardening its system by adding strong poles and covered conductors, undergrounding or eliminating lines. In addition, the company has enhanced inspection cycles and added weather stations, high definition cameras, and aircraft for faster and around-the-clock patrols. The company has also established fire detection and fire spread modelling capabilities based on industry-leading satellite systems that offers advanced warning of potential new fire incidents.

Section 4 – Niche Asset Portfolio

The Niche Asset Portfolio is a fund of funds investment vehicle, managed by Cambridge Associates. The manager invests in both liquid and illiquid investments:

- Some liquid managers may invest directly in listed securities
- Illiquid managers invest in private companies, while a number do not invest in companies

We have provided the relevant information for the funds that invest in listed equities.

How the managers voted

Manager	Number of potential votes	Proportion of votes cast	For	Against	Abstain
Element Capital Management LLC	742	100%	663	64	15
ARCM*	100	100%	95%	5%	0
Sylebra	205	100%	185	12	8
Cyrus	61	100%	58	3	0

*ARCM voting statistics reflect the combined votes of the two ARCM funds held (ARCM Fund III and ARCM Feeder Fund IV).

A summary of the use of proxy voting by the managers is as follows:

Manager	Use of proxy voting service	Comment
ARCM Fund 3	Yes - Broadridge	ARCM has recently engaged the services of Broadridge as the Firm's Proxy Voting Platform for AGM voting.
Sylebra	No	

Private market (illiquid) investments – engagement examples

Manager	Engagement activity
Bridgepoint Advisers Limited	Cory is an example of how direct engagement with ESG matters helps to manage risk and drive value creation. Cory is a UK-based waste management business where Bridgepoint Credit led a restructuring taking a major shareholding and board observer rights. The business offered a broad range of environmental services including landfill, waste collection, waste recycling and energy production from waste, and was thereby intimately involved in many key environmental activities. Over the course of our involvement as a shareholder, the business grew its revenues and profitability significantly whilst reducing its environmental impact. It improved efficiency in energy production whilst saving 149,000 tonnes of carbon per annum by avoiding waste being sent to landfill. However, perhaps the greatest achievement - of which we are most proud - was the huge savings in energy consumption and reduction in carbon footprint achieved through switching transportation of waste from road to water: this alone saved c. 200kg of carbon per tonne of waste when compared to an equivalent landfill process.
General Atlantic LLC	To the extent ESG considerations are identified as integral to the value creation plan created for a portfolio company, GA would seek to work with the board and the company management to further manage ESG factors and implement necessary processes at the company. In 2019, GA invested in an online social shopping platform focused on the resale of clothing and other items. As a resale platform the business is fundamentally centered on sustainability, but GA helped to implement a formal Sustainability Framework aligned with relevant United Nations Sustainable Development Goals (SDGs), and is tracking progress towards these goals over the period of 2020-2022. Additionally, GA connected the company's management team with the sustainability team at another GA portfolio company with a similar business model, in order to share information and best practices, and seeks to make further similar connections across additional GA portfolio companies.
One Peak Partners	As part of One Peak's ESG efforts, we have engaged with the management team at PandaDoc, a leading provider of all-in-one document automation software, to actively promote one of the first free of charge, unlimited eSignature offerings globally. The initiative was motivated by the dual aim of supporting small and medium enterprises facing severe disruption due the global pandemic in 2020 and fighting deforestation linked to excess paper consumption by the many businesses that are not yet making use of eSignatures. The free eSignature offering proved to be a huge success having been adopted by over 200,000 users issuing over 1 million documents for eSignature within the first year of launching the program alone, thereby saving millions of pages of paper. In addition, the initiative helped drive substantial new business opportunities by fuelling the adoption of premium paid plans, and also had the benefit of positively impacting the company's brand image.

Independent auditors' statement about contributions to the Group Trustee of E.ON UK Group of the Electricity Supply Pension Scheme

Statement about contributions

Opinion

In our opinion, the contributions required by the schedule of contributions for the Group year ended 31 March 2021 as reported in E.ON UK Group of the Electricity Supply Pension Scheme's summary of contributions have, in all material respects, been paid in accordance with the schedule of contributions certified by the Group actuary on 27 June 2019.

We have examined E.ON UK Group of the Electricity Supply Pension Scheme's summary of contributions for the Group year ended 31 March 2021 which is set out on the following page.

Basis for opinion

Our examination involves obtaining evidence sufficient to give reasonable assurance that contributions reported in the summary of contributions have, in all material respects, been paid in accordance with the relevant requirements. This includes an examination, on a test basis, of evidence relevant to the amounts of contributions payable to the Group under the schedule of contributions, and the timing of those payments.

Responsibilities for the statement about contributions

Responsibilities of the Group Trustee in respect of contributions

As explained more fully in the statement of Group Trustee's responsibilities, the Group's Group Trustee is responsible for preparing, and from time to time reviewing and if necessary revising, a schedule of contributions and for monitoring whether contributions are made to the Group by employers in accordance with relevant requirements.

Auditors' responsibilities in respect of the statement about contributions

It is our responsibility to provide a statement about contributions and to report our opinion to you.

Use of this report

This report, including the opinion, has been prepared for and only for the Group Trustee as a body in accordance with section 41 of the Pensions Act 1995 and for no other purpose. We do not, in giving this opinion, accept or assume responsibility for any other purpose or to any other person to whom this report is shown or into whose hands it may come save where expressly agreed by our prior consent in writing.

PricewaterhouseCoopers LLP

PricewaterhouseCoopers LLP
Chartered Accountants and Statutory Auditors
Leeds
27 August 2021

SUMMARY OF CONTRIBUTIONS PAYABLE IN THE YEAR ENDED 31 MARCH 2021

During the year the contributions required by the schedule of contributions for the Group year ended 31 March 2021 were as follows:

	Employees £ million	Employers £ million	Total £ million
Required by the schedule of contributions			
Normal contributions – Defined Benefit*	-	22.6	22.6
Total as reported on by Group auditors	**-**	**22.6**	**22.6**
Other contributions payable			
Early retirements	-	12.3	12.3
Supplementary pensions funding	-	2.8	2.8
Rule 29 contributions	-	0.2	0.2
AVCs	0.5	0.2	0.7
Total	**0.5**	**38.1**	**38.6**

*Under salary sacrifice arrangements, £4.7m of contributions were met by the Employer rather than the Members and are included in the £22.6m above.

Approved by and signed on behalf of the Group Trustees on 26 August 2021:

Martine Trouard-Riolle
On behalf of Capital Cranfield
Pension Trustees Limited - Chair of the Group Trustees

Graeme Thompson
Director

Independent auditors’ report to the Group Trustee of E.ON UK Group of the Electricity Supply Pension Scheme

Report on the audit of the financial statements

Opinion

In our opinion, E.ON UK Group of the Electricity Supply Pension Scheme’s financial statements:

- show a true and fair view of the financial transactions of the Group during the year ended 31 March 2021, and of the amount and disposition at that date of its assets and liabilities, other than liabilities to pay pensions and benefits after the end of the year;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards comprising FRS 102 “The Financial Reporting Standard applicable in the UK and Republic of Ireland”, and applicable law); and
- contain the information specified in Regulation 3A of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996.

We have audited the financial statements, included in the Annual Report and Financial Statements, which comprise: the Statement of Net Assets Available for Benefits as at 31 March 2021; the Fund Account for the year then ended; and the notes to the financial statements, which include a description of the significant accounting policies.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (“ISAs (UK)”) and applicable law. Our responsibilities under ISAs (UK) are further described in the Auditors’ responsibilities for the audit of the financial statements section of our report. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Independence

We remained independent of the Group in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, which includes the FRC’s Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

Conclusions relating to going concern

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Group’s ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

In auditing the financial statements, we have concluded that the Group Trustee’s use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

However, because not all future events or conditions can be predicted, this conclusion is not a guarantee as to the Group’s ability to continue as a going concern.

Our responsibilities and the responsibilities of the Group Trustee with respect to going concern are described in the relevant sections of this report.

Reporting on other information

The other information comprises all the information in the Annual Report and Financial Statements other than the financial statements, our auditors’ report thereon and our auditors’ statement about contributions. The Group Trustee is responsible for the other information. Our opinion on the financial statements does not cover the other information and, accordingly, we do not express an audit opinion or any form of assurance thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If we identify an apparent material inconsistency or material misstatement, we are required to perform procedures to conclude whether there is a material misstatement of the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report based on these responsibilities.

Responsibilities for the financial statements and the audit

Responsibilities of the Group Trustee for the financial statements

As explained more fully in the statement of Group Trustee's responsibilities, the Group Trustee is responsible for ensuring that the financial statements are prepared in accordance with the applicable framework and for being satisfied that they show a true and fair view. The Group Trustee is also responsible for such internal control as it determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In the preparation of the financial statements, the Group Trustee is responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Group Trustee either intends to wind up the Group, or has no realistic alternative but to do so.

Auditors' responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud, is detailed below.

Based on our understanding of the Group and its environment, we identified that the principal risks of non-compliance with laws and regulations related to the administration of the Group in accordance with the Pensions Acts 1995 and 2004 and regulations made under them, and codes of practice issued by the Pensions Regulator; and we considered the extent to which non-compliance might have a material effect on the financial statements. We also considered the direct impact of these laws and regulations on the financial statements. We evaluated incentives and opportunities for fraudulent manipulation of the financial statements, including the risk of override of controls, by the Group Trustee and those responsible for, or involved in, the preparation of the underlying accounting records and financial statements, and determined that the principal risks were related to posting inappropriate journals to conceal misappropriation of assets and inappropriate adjustments of asset valuations. Audit procedures performed included:

- Testing of journals where we identified particular risk criteria.
- Obtaining independent confirmations of material investment valuations and cash balances at the year end.
- Reviewing estimates and judgements made in the preparation of the financial statements.
- Reviewing meeting minutes, any correspondence with the Pensions Regulator, contracts and agreements, and holding discussions with the Group Trustee to identify significant or unusual transactions and known or suspected instances of fraud or non-compliance with laws and regulations.

There are inherent limitations in the audit procedures described above. We are less likely to become aware of instances of non-compliance with laws and regulations that are not closely related to events and transactions reflected in the financial statements. Also, the risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error, as fraud may involve deliberate concealment by, for example, forgery or intentional misrepresentations, or through collusion.

A further description of our responsibilities for the audit of the financial statements is located on the FRC's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditors' report.

Use of this report

This report, including the opinion, has been prepared for and only for the Group Trustee as a body in accordance with section 41 of the Pensions Act 1995 and for no other purpose. We do not, in giving this opinion, accept or assume responsibility for any other purpose or to any other person to whom this report is shown or into whose hands it may come save where expressly agreed by our prior consent in writing.

PricewaterhouseCoopers LLP

PricewaterhouseCoopers LLP
Chartered Accountants and Statutory Auditors
Leeds
27 August 2021

FUND ACCOUNT

For the year ended 31 March 2021

	Note	DB 2021 £million	DC 2021 £million	**Total 2021 £million**	*DB 2020 £million*	*DC 2020 £million*	*Total 2020 £million*
Contributions and benefits							
Employer contributions	**4**	38.1	-	**38.1**	*282.0*	-	*282.0*
Employee contributions	**4**	0.5	-	**0.5**	*0.8*	-	*0.8*
Total contributions		38.6	-	**38.6**	*282.8*	-	*282.8*
		38.6	-	**38.6**	*282.8*	-	*282.8*
Benefits paid or payable	**5**	(200.3)	(0.1)	**(200.4)**	*(201.1)*	-	*(201.1)*
Payments to and on account of leavers	**6**	(14.7)	(13.0)	**(27.7)**	*(82.0)*	*(0.3)*	*(82.3)*
PPF and other levies	**7**	(0.2)	-	**(0.2)**	*(0.2)*	-	*(0.2)*
Administrative expenses	**8**	(2.2)	-	**(2.2)**	*(1.9)*	-	*(1.9)*
		(217.4)	(13.1)	**(230.5)**	*(285.2)*	*(0.3)*	*(285.5)*
Net withdrawals from dealings with members		(178.8)	(13.1)	**(191.9)**	*(2.4)*	*(0.3)*	*(2.7)*
Returns on investments							
Investment income	**9**	0.8	-	**0.8**	*0.7*	-	*0.7*
Change in market value of investments	**10**	296.6	2.7	**299.3**	*157.6*	*(0.8)*	*156.8*
Investment management expenses	**16**	(2.8)	-	**(2.8)**	*(3.8)*	-	*(3.8)*
Net returns on investments		294.6	2.7	**297.3**	*154.5*	*(0.8)*	*153.7*
Net increase / (decrease) in the Fund during the year		115.8	(10.4)	**105.4**	*152.1*	*(1.1)*	*151.0*
Opening net assets		4,769.0	10.4	**4,779.4**	*4,616.9*	*11.5*	*4,628.4*
Closing net assets		4,884.8	-	**4,884.8**	*4,769.0*	*10.4*	*4,779.4*

The notes on pages 46 to 60 form part of these Financial Statements.

STATEMENT OF NET ASSETS AVAILABLE FOR BENEFITS

As at 31 March 2021

	Note	DB 2021 £million	DC 2021 £million	**Total 2021 £million**	*DB 2020 £million*	*DC 2020 £million*	*Total 2020 £million*
Investment assets							
Pooled investment vehicles	**11**	4,875.9	0.8	**4,876.7**	*4,758.7*	*10.3*	*4,769.0*
AVC investments	**12**	6.4	-	**6.4**	*6.2*	-	*6.2*
Cash	**13**	0.2	-	**0.2**	-	-	-
		4,882.5	0.8	**4,883.3**	*4,764.9*	*10.3*	*4,775.2*
Investment liabilities							
Other investment balances	**13**	-	-	**-**	*(0.5)*	-	*(0.5)*
		-	-	**-**	*(0.5)*	-	*(0.5)*
Total net investments		4,882.5	0.8	**4,883.3**	*4,764.4*	*10.3*	*4,774.7*
Current assets	**19**	3.6	0.2	**3.8**	*6.6*	*0.1*	*6.7*
Current liabilities	**20**	(1.3)	(1.0)	**(2.3)**	*(2.0)*	-	*(2.0)*
Total net assets available for benefits		4,884.8	-	**4,884.8**	*4,769.0*	*10.4*	*4,779.4*

The Financial Statements summarise the transactions of the Group and deal with the net assets available for benefits at the disposal of the Group Trustees. They do not take account of obligations to pay pensions and benefits which fall due after the end of the Scheme year. The actuarial position of the Group, which does take account of such obligations, is dealt with in the report on Actuarial Liabilities on pages 16 to 18 of this Annual Report and these Financial Statements should be read in conjunction with this report. The notes on pages 46 to 60 form part of these Financial Statements.

The Financial Statements on pages 44 to 60 were approved by the Group Trustees on 26 August 2021.

Approved by and signed on behalf of the Group Trustees:

Martine Trouard-Riolle
On behalf of Capital Cranfield
Pension Trustees Limited - Chair of the Group Trustees

Graeme Thompson
Director

Notes to the Financial Statements

Year ended 31 March 2021

1. Basis of preparation of the financial statements

The individual financial statements of E.ON UK Group of the Electricity Supply Pension Scheme have been prepared in accordance with the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, Financial Reporting Standard (FRS) 102 - The Financial Reporting Standard applicable in the UK and Republic of Ireland issued by the Financial Reporting Council ("FRS 102") and the guidance set out in the Statement of Recommended Practice "Financial Reports of Pension Schemes" (Revised June 2018) ("the SORP").

2. Identification of the financial statements

The Group is established as a trust under English law. The ESPS is a registered pension scheme under Chapter 2, Part 4 of the Finance Act 2004. This means that contributions by the Employers are normally eligible for tax relief, and income and capital gains earned by the Group are generally tax exempt. The address for enquiries to the Group is RPMI,2 Rye Hill Office Park, Birmingham Road, Coventry, CV5 9AB.

3. Summary of significant accounting policies

The principal accounting policies applied in the preparation of these Financial Statements are set out below. These policies have been consistently applied to all years presented, unless otherwise stated.

Currency

The Group's functional currency and presentational currency is pounds sterling (GBP).

Assets and liabilities in foreign currency are expressed in sterling at the rates of exchange ruling at the year end. Foreign currency transactions are translated into sterling at the spot exchange rate at the date of the transaction.

Gains and losses arising on conversion or translation are dealt with as part of the change in market value of investments.

Contributions

Normal and additional voluntary contributions, both from employees and employers (including salary sacrifice), are generally accounted for on an accruals basis in the payroll period to which they relate. In the case of member contributions this is when deducted from pay.

Employers' Early Retirement contributions, Rule 29 and Supplementary pensions funding contributions are accounted for in accordance with the agreement under which they are paid, or in the absence of such agreement, when received.

Employers' deficit funding contributions are accounted for on the due dates set out in the Schedule of Contributions, or on receipt if earlier, with the agreement of the Employer and Group Trustees.

Transfers to and from the Group

Transfer values represent the capital sums either receivable in respect of members from other pension plans of previous employers or payable to the pension plans of new employers for members who have left the Group. They are accounted for on an accruals basis on the date the trustees of the receiving plan accept the liability. In the case of individual transfers, this is normally when payment of the transfer value is made.

Benefits and payments to and on account of leavers

Pensions in payment are accounted for in the period to which they relate.

Where members can choose whether to take their benefits as a full pension or as a lump sum with reduced pension, retirement benefits are accounted for on an accruals basis on the later date of retirement and the date the option is exercised.

Other benefits are accounted for on an accruals basis on the date of retirement or death as appropriate. Refunds and opt-outs are accounted for when the Group Trustees are notified of the members' decision to leave the Scheme.

Where the Group Trustees agree or are required to settle tax liabilities on behalf of a member (such as where lifetime or annual allowances are exceeded) with a consequent reduction in that member's benefits receivable from the Scheme, any tax liability due is accounted for on the same basis as the event giving rise to the tax liability and shown separately within Benefits.

Administrative and other expenses

Administrative expenses, including the PPF and other levies, are accounted for on an accruals basis.

Investment income and expenditure

Income from equities, and any pooled investment vehicles which distribute income, is accounted for on an accruals basis on the date stocks are quoted ex-dividend, or in the case of unquoted instruments, when the dividend is declared.

Other interest on cash and short term deposits and income from other investments are accounted for on an accruals basis.

Investment income includes withholding taxes. Withholding taxes is accrued on the same basis as investment income. Where withholding tax is not recoverable, this is shown as a separate expense within investment income.

The change in market value of investments during the year comprises all increases and decreases in market value of investments held at any time during the year, including profits and losses realised on sales of investments and unrealised changes in market value. In the case of pooled investment vehicles which are accumulation funds, where income is reinvested within the fund without issue of further units, change in market value also includes such income.

Transaction costs are included in the cost of purchases and sale proceeds. Transaction costs include costs charged directly to the Group such as fees, commissions, stamp duty and other fees. Other investment management expenses are accounted for on an accruals basis and shown separately within investment returns.

Valuation and classification of investments

Investment assets and liabilities are included in the Financial Statements at fair value. Where separate bid and offer prices are available, the bid price is used for investment assets and the offer price for investment liabilities. Otherwise, the closing single price, single dealing price or most recent transaction price is used.

Where quoted and other unit prices are not available, the Group Trustees adopt valuation techniques appropriate to the class of investment. Details of the valuation techniques and principal assumptions are given in the Notes to the Financial Statements where used.

The methods of determining fair value for the principal classes of investments are:

- Certain pooled investment vehicles, which are traded on an active market, are included at the quoted price, which is normally the bid price;

- Unitised pooled investment vehicles, which are not traded on an active market, but where the manager is able to demonstrate that they are priced daily, weekly or at each month end, and are actually traded on substantially all pricing days are included at the last price provided by the manager at or before the year end;

- The value of other pooled investment vehicles which are unquoted or not actively traded on a quoted market is estimated by the Group Trustees. Where the value of the pooled investment vehicle is primarily driven by fair value of its underlying assets, the net asset value advised by the fund manager is normally considered a suitable approximation to fair value unless there are restrictions or other factors which prevent realisation at that value, in which case adjustments are made;

- The Group holds some historic annuity policies in the name of the Trustees. Given the levels involved, these annuity policies have been excluded from the financial statements on the grounds of materiality.

Critical accounting judgements and estimation uncertainty

Estimates and judgements are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances.

Critical accounting judgements

The Group Trustees have not had to make any critical judgements in applying the accounting policies.

Key accounting estimates and assumptions

The Group Trustees make estimates and assumptions concerning the future. The resulting accounting estimates will, by definition, seldom equal the related actual results. For the Group, the Group Trustees believe the only estimates and assumptions that have a significant risk of causing a material adjustment to the carrying amount of assets and liabilities within the next financial year are related to the valuation of the Group's investments.

4. Contributions

	DB 2021 £million	DC 2021 £million	**Total 2021 £million**	*DB 2020 £million*	*DC 2020 £million*	*Total 2020 £million*
Employers						
Normal	17.9	-	**17.9**	*25.5*	-	*25.5*
Salary sacrifice*	4.7	-	**4.7**	*5.8*	-	*5.8*
Salary sacrifice – AVC**	0.2	-	**0.2**	*0.2*	-	*0.2*
Special						
Early retirement	12.3	-	**12.3**	*12.3*	-	*12.3*
Supplementary pensions funding***	2.8	-	**2.8**	*4.0*	-	*4.0*
Deficit funding****	-	-	**-**	*233.8*	-	*233.8*
Rule 29	0.2	-	**0.2**	*0.4*	-	*0.4*
Employees						
AVCs	0.5	-	**0.5**	*0.8*	-	*0.8*
	38.6	-	**38.6**	*282.8*	-	*282.8*

*Under the salary sacrifice arrangement, £4.7m (*2020: £5.8m*) of contributions were met by the employer rather than the employees.

**Under the salary sacrifice arrangement, £0.2m (*2020: £0.2m*) of additional voluntary contributions were met by the employer rather than the employees.

***Supplementary pensions funding represents Employer contributions to grant additional benefits on early retirement including Rule 32 payments (grant of special terms).

**** Deficit funding contributions were paid in the prior year as a result of the funding deficit declared in the actuarial valuation of the Group as at 31 March 2018 and under the terms of the agreement between the Employers and the Group Trustees reflected in the schedule of contributions certified on 27 June 2019. Under this schedule, deficit repair payments totalling £233.8m were made in August 2019, and two further payments of up £91.5m each will be made in January 2022 and January 2023.

There were DC Section contributions made in the years to 31 March 2021 and 31 March 2020, but they do not show in the above table due to roundings.

5. Benefits paid or payable

	DB 2021 £million	DC 2021 £million	**Total 2021 £million**	*DB 2020 £million*	*DC 2020 £million*	*Total 2020 £million*
Pensions	182.6	-	**182.6**	*181.4*	-	*181.4*
Lump sum retirement benefits and commutations	17.0	0.1	**17.1**	*18.5*	-	*18.5*
Purchase of annuities on retirement (AVCs)	0.3	-	**0.3**	*0.6*	-	*0.6*
Lump sum death benefits (in service)	0.2	-	**0.2**	*0.4*	-	*0.4*
Lump sum death benefits (in retirement)	0.1	-	**0.1**	*0.1*	-	*0.1*
Taxation where annual or lifetime allowance exceeded	0.1	-	**0.1**	*0.1*	-	*0.1*
	200.3	0.1	**200.4**	*201.1*	-	*201.1*

Taxation arising on benefits paid or payable is in respect of members whose benefits exceeded the lifetime or annual allowance and who elected to take lower benefits from the Group in exchange for the Group settling their tax liability.

10. Reconciliation of net investments

Defined benefit section

	Opening value £million	Purchases £million	Sales proceeds £million	Change in market value £million	**Closing value £million**
Pooled investment vehicles	4,758.7	1,704.7	(1,882.1)	294.6	**4,875.9**
AVC investments	6.2	5.6	(6.4)	1.0	**6.4**
	4,764.9	1,710.3	(1,888.5)	295.6	**4,882.3**
Cash	-				**0.2**
Other investment balances	(0.5)				**-**
Total net investments	4,764.4				**4,882.5**

Change in market value reconciliation

	2021 £million	*2020 £million*
Change in market value from reconciliation of net investments	**295.6**	*157.7*
Exchange gains / (losses)	**1.0**	*(0.1)*
	296.6	*157.6*

Defined contribution section

	Opening value £million	Purchases £million	Sales proceeds £million	Change in market value £million	**Closing value £million**
Pooled investment vehicles	10.3	-	(12.2)	2.7	**0.8**

	DC 2021 £million	*DC 2020 £million*
Allocated to members	**0.8**	*10.3*
Not allocated to members	**-**	-
	0.8	*10.3*

The Defined Contribution funds are managed by Aegon and Prudential Assurance Company Limited, both registered in the UK.

Defined contribution assets purchased by the Group are allocated to provide benefits to those individuals on whose behalf the corresponding contributions were paid. Accordingly, the assets identified as designated to members above do not form a common pool of assets available for members generally. Members receive an annual statement confirming the contributions paid on their behalf and the value of their money purchase rights.

Investment transaction costs

No transaction costs were incurred during the year (*2020: £nil*). Indirect costs are incurred through the bid-offer spread on investments within pooled investment vehicles and charges made within those vehicles. It has not been possible for the Group Trustees to quantify such indirect transaction costs.

11. Pooled investment vehicles

	DB 2021 £million	DC 2021 £million	**Total 2021 £million**	*DB 2020 £million*	*DC 2020 £million*	*Total 2020 £million*
Equities	1,140.4	0.7	**1,141.1**	*595.1*	*7.2*	*602.3*
Bonds	402.3	0.1	**402.4**	*145.0*	*1.6*	*146.6*
Property	-	-	**-**	*0.9*	*0.1*	*1.0*
Hedge funds	782.9	-	**782.9**	*870.5*	*-*	*870.5*
Diversified growth funds	-	-	**-**	*256.3*	*-*	*256.3*
Private equity	204.1	-	**204.1**	*176.0*	*-*	*176.0*
Liability driven investments	2,323.2	-	**2,285.9**	*2,686.3*	*-*	*2,686.3*
Cash and other liquid assets	23.0	-	**60.3**	*28.6*	*1.4*	*30.0*
	4,875.9	0.8	**4,876.7**	*4,758.7*	*10.3*	*4,769.0*

At 31 March 2021 and 31 March 2020 the Group held a bespoke Liability Driven Investment (LDI) portfolio. The portfolio has been included above in the DB Section's Pooled investment vehicles, is specifically tailored for the Group's individual requirements and there are no other investors in it.

The LDI portfolio has the following investments:

	DB 2021 £million	*DB 2020 £million*
Bonds	**2,331.0**	*2,534.4*
Swaps – net	**95.6**	*211.1*
Repurchase agreements	**(114.7)**	*(68.5)*
Cash and other liquid assets	**11.3**	*9.3*
	2,323.2	*2,686.3*

Direct transaction costs have been incurred on the sole investor arrangement of £nil (*2020: £nil*).

12. AVC Investments

The number of AVC accounts (including "frozen" accounts) as at 31 March 2021 was 354 (*2020: 351*). In some cases members have two or more accounts.

The aggregate amounts of AVC investments held in pooled investment vehicles are as follows:

	DB 2021 £million	*DB 2020 £million*
Aviva	**5.3**	*0.1*
Utmost Life and Pensions Limited	**-**	*0.3*
Prudential Assurance Society	**0.4**	*0.9*
Scottish Life Assurance	**-**	*0.9*
Standard Life Assurance	**0.7**	*4.0*
	6.4	*6.2*

13. Cash and other net investment balances

	DB 2021 £million	DC 2021 £million	**Total 2021 £million**	*DB 2020 £million*	*DC 2020 £million*	*Total 2020 £million*
Total cash	0.2	-	**0.2**	*-*	*-*	*-*
Other investment liabilities	-	-	**-**	*(0.5)*	*-*	*(0.5)*
	0.2	-	**0.2**	*(0.5)*	*-*	*(0.5)*

14. Employer related investments

As at 31 March 2021 and 31 March 2020 the Group had none of its assets invested directly in E.ON UK plc or its associated companies. There were also no assets (*2020: £nil*) invested indirectly in E.ON UK plc through pooled investment vehicles. This was in accordance with the policy of the Group Trustees.

15. Concentration of investments

Investments accounting for more than 5% of the net assets of the Group at either 31 March 2021 or 31 March 2020 were:

	2021	**2021**	*2020*	*2020*
	£million	**%**	*£million*	*%*
Insight LDI Active 29 Fund	**2,285.9**	**46.8**	*2,686.3*	*56.2*
Egerton Capital Equity Fund Class I GBP (Hedged)	**579.0**	**11.9**	*304.0*	*6.4*
FCOI II Currency Class Fund, Ltd, Class A (GBP)	**269.7**	**5.5**	*161.5*	*3.4*
Gresham Multi-Asset Credit Funds Ltd Series A	**255.2**	**5.2**	*142.2*	*3.0*
Feeder Lyxor SG Global Quality Income NTR, Share Class C	**254.1**	**5.2**	*169.7*	*3.6*
Invesco Perpetual Global Targeted Returns Fund	**-**	**-**	*256.3*	*5.4*

16. Investment management expenses

Investment management fees for Group-specific funds, performance measurement services and investment-related fees of Group advisers are the responsibility of the Group Trustees. The Scheme Trustee negotiates the custody fees which apply to all portfolios. Investment management and custody fees for Group-specific funds are shown below.

	DB	*DB*
	2021	*2020*
	£million	*£million*
Administration and management	**1.2**	*2.6*
Custody and accounting	**0.1**	*0.1*
Investment advice – DB	**1.1**	*0.9*
Legal	**0.2**	*-*
Other	**0.1**	*0.1*
Investment advice – DC	**0.1**	*0.1*
	2.8	*3.8*

17. Fair value of investments

The fair value of investments has been determined using the following hierarchy:

- Level 1: Unadjusted quoted price in an active market for identical instruments that the entity can access at the measurement date.
- Level 2: Inputs (other than quoted prices) that are observable for the instrument, either directly or indirectly.
- Level 3: Inputs are unobservable.

Where multiple inputs are involved in determining the fair value of an instrument, the categorisation is based on the lowest level input (i.e. highest number) that is significant.

Pooled investment vehicles which are traded regularly are generally included in level 2. Where the absence of regular trading or the unsuitability of recent transaction prices as a proxy for fair values applies, valuation techniques are adopted and the vehicles are included in level 3 as appropriate.

The value of other equities, bonds and pooled investment vehicles which are unquoted or not actively traded on a quoted market is estimated by the Group Trustees. Where the value of the pooled investment vehicle is primarily driven by fair value of its underlying assets, the net asset value advised by the fund manager is normally considered a suitable approximation to fair value unless there are restrictions or other factors which prevent realisation at that value, in which case adjustments are made. No such adjustments have been made to the valuations at 31 March 2021 or 31 March 2020.
The Group's investment assets and liabilities have been included at fair value within the categories as follows:

	Level 1 £million	Level 2 £million	Level 3 £million	**2021Total £million**
DB section				
Investment assets				
Pooled investment vehicles	-	4,606.3	269.6	**4,875.9**
AVC investments	-	6.4	-	**6.4**
Cash	0.2	-	-	**0.2**
DB section total	0.2	4,612.7	269.6	**4,882.5**
DC section				
Investment assets				
Pooled investment vehicles	-	0.8	-	**0.8**
DC section total	-	0.8	-	**0.8**
Total net investments	0.2	4,613.5	269.6	**4,883.3**

Analysis for the prior year end is as follows:

	Level 1 £million	Level 2 £million	Level 3 £million	**2020 Total £million**
DB section				
Investment assets				
Pooled investment vehicles	-	4,596.4	162.3	**4,758.7**
AVC investments	-	6.2	-	**6.2**
Investment liabilities				
Other investment balances	(0.5)	-	-	**(0.5)**
DB section total	(0.5)	4,602.6	162.3	**4,764.4**
DC section				
Investment assets				
Pooled investment vehicles	-	10.3	-	**10.3**
DC section total	-	10.3	-	**10.3**
Total investments	(0.5)	4,612.9	162.3	**4,774.7**

18. Investment risks

Financial Reporting Standards (FRS) 102 requires the disclosure of information in relation to certain investment risks. These risks are set out by FRS 102 as follows:

Credit risk: this is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation.

Market risk: this comprises currency risk, interest rate risk and other price risk as follows:

- **Currency risk:** this is risk that fair value or future cash flows of a financial asset will fluctuate because of changes in foreign exchange rates;
- **Interest rate risk:** this is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in market interest rates; and
- **Other price risk:** this is the risk that the fair value or future cash flows of a financial asset will fluctuate because of changes in market prices (other than those arising from interest rate risk or currency risk), whether those changes are caused by factors specific to the individual financial instrument or its issuer, or factors affecting all similar financial instruments traded in the market.

The Group Trustees determine their investment strategy after taking advice from a professional investment adviser. The Group has exposure to these risks because of the investments it makes in following the investment strategy set out below. The Group Trustees manage investment risks, including credit risk and market risk, within agreed risk limits which take into account the Group's strategic investment objectives. These investment objectives and risk limits are implemented through the investment agreements in place with the Group's investment managers and monitored by the Group Trustees by regular reviews of the investment portfolio.

Further information on the Group Trustees' approach to risk management, credit and market risk is set out below. This does not include the legacy insurance policies or AVC investments as these are not considered significant to the overall investments of the Group.

The following table summarises the extent to which the various classes of investments (with the underlying assets of the LDI fund split out for the purposes of this analysis) are affected by financial risk:

	Credit risk	Market risk			**2021**	2020
		Currency	Interest rate	Other price	**£ million**	£ million
Defined benefits section						
Bonds	●	◐	●	○	**2,331.0**	*2,534.4*
Pooled investment vehicles	●	◐	◐	●	**2,590.0**	*2,072.4*
Derivatives	◐	◐	◐	◐	**95.6**	*211.1*
Repurchase agreements	◐	◐	◐	◐	**(114.7)**	*(68.5)*
Cash and other investment assets	●	◐	○	○	**(19.4)**	*15.0*
Total DB section					**4,882.5**	*4,764.4*
Defined contribution section						
Pooled investment vehicles	●	◐	◐	◐	**0.8**	*10.3*

In the above table, the risk noted effect the asset class [●] significantly, [◐] partially or [○] hardly/not at all.

Defined benefit section

Investment Strategy

The investment objective of the defined benefit section (DB Section) is to maintain a portfolio of suitable assets of appropriate liquidity which will generate investment returns to meet, together with future contributions, the benefits of the DB Section payable under the Trust Deed and Rules as they fall due.

The Group Trustees set the investment strategy for the DB Section taking into account considerations such as the strength of the Employer covenant, the long term liabilities of the DB Section and the funding agreed with the Employer. The investment strategy is set out in the Group's Statement of Investment Principles ("SIP").

The current strategy is to hold a portion of the assets (approximately 53% at the year-end) in investments that move in line with the long-term liabilities of the Group. This is referred to as LDI and comprises UK and overseas government and corporate bonds and interest rate swaps, the purpose of which is to hedge against the impact interest rate movement on long term liabilities.

The remaining assets are held in return seeking investments comprising UK and overseas equities, equity futures, investment property, hedge funds and private equity.

Credit Risk

The Group is subject to credit risk because the Group directly invests in bonds, over-the-counter ("OTC") derivatives, has cash balances, and enters into repurchase agreements. The Group also invests in pooled investment vehicles and is therefore directly exposed to credit risk in relation to the instruments it holds in the pooled investment vehicles. The Group is also indirectly exposed to credit risks arising on some of the financial instruments held by the pooled investment vehicles.

Credit risk arising on bonds held directly is mitigated by investing in government bonds where the credit risk is minimal, or corporate bonds that are backed by UK Government guarantee. Credit risk arising on other investments is mitigated by investment mandates requiring all counterparties to be at least investment grade rated.

The Group Trustees consider financial instruments or counterparties to be of investment grade if they are rated BBB- or higher by Standard & Poor's or Fitch, or rated at Baa3 or higher by Moody's.

Credit risk arising from derivatives depends on whether the derivative is exchange traded or OTC. OTC derivative contracts are not guaranteed by any regulated exchange and therefore the Group is subject to risk of failure of the counterparty. The credit risk for OTC swaps is reduced by collateral arrangements that require daily posting of cash collateral between counterparties. Credit risk also arises on forward foreign currency contracts and these are also subject to daily collateralisation arrangements. All counterparties are required to be at least investment grade.

Cash is held within financial institutions which are at least investment grade credit rated.

Credit risk on repurchase agreements is mitigated through collateral arrangements that require daily posting of cash collateral between counterparties.

Direct credit risk arising from pooled investment vehicles is mitigated by the underlying assets of the pooled arrangements being ring-fenced from the pooled manager, the regulatory environments in which the pooled managers operate and diversification of the investments amongst a number of pooled arrangements. The Group Trustees carry out due diligence checks on the appointment of new pooled investment managers and on an ongoing basis monitor any changes to the operating environment of the pooled manager. Pooled investment arrangements used by the Group comprise unit linked insurance contracts and authorised unit trusts.

A summary of pooled investment vehicles by type of arrangement is as follows:

DB Section

Type of arrangement	**2021 £m**	*2020 £m*
Unit-linked insurance contracts	-	256.2
Open-ended investment companies	212.1	-
Shares of limited liability partnerships	48.1	-
Other	4,615.7	4,502.5
Total	**4,875.9**	**4,758.7**

DC Section

Type of arrangement	**2021 £m**	*2020 £m*
Unit-linked insurance contracts	0.8	*10.3*

Indirect credit risk: arises in relation to underlying investments held in the bond pooled investment vehicles. This risk is mitigated by limiting the total proportion of the return seeking portfolio that may be invested in pooled investment vehicles that can hold sub-investment grade bonds.

The information about exposures to and mitigation of credit risk above applied at both the current and previous year end.

Currency Risk

The Group is subject to currency risk because some of the Group's investments are held in overseas markets, either as segregated investments (direct exposure) or via pooled investment vehicles (indirect exposure). The net currency exposure at the current and previous year-ends was:

	Direct exposure (million)	**Indirect exposure (million)**	**Hedging (million)**	**2021 Net exposure after hedging (million)**	*2020 Net exposure after hedging (million)*
Pounds sterling (GBP)	-	4,548.2	309.5	4,857.7	*4,755.9*
US Dollars (USD)	-	324.0	(309.5)	14.5	*7.6*
Euros (EUR)	-	9.9	-	9.9	*0.9*
Other currencies	-	-	-	-	-
		4,882.1	-	4,882.1	*4,764.4*
Unhedged foreign currency				*7%*	*5%*

Interest Rate Risk

The Group is subject to interest rate risk because some of the Group's investments are held in bonds and interest rate swaps (either as segregated investments or through pooled investment vehicles), and cash. The Group Trustees have set a benchmark for total investment in bonds and interest swaps of between 45% and 100% of the total actuarial liabilities as part of their LDI investment strategy. Under this strategy, if interest rates fall, the value of the LDI investments will rise to help match the increase in actuarial liabilities arising from a fall in the discount rate. Similarly, if interest rates rise, the LDI investments will fall in value, as will the actuarial liabilities because of an increase in the discount rate. At the year-end the LDI portfolio represented 47% of the total investment portfolio (*2020: 56%*).

Other Price Risk

Other price risk arises principally in relation to the Group's return seeking portfolio which includes directly held equities, equities held in pooled vehicles, hedge funds and private equity. At the year-end the return seeking portfolio represented 53% of the total investment portfolio (*2020: 44%*).

The Group manages this exposure to overall price movements by constructing a diverse portfolio of investments across various markets.

Defined contributions section

Investment strategy

The Group Trustees' objective is to make available to members of the Group an appropriate range of investment options designed to generate income and capital growth, which together with new contributions from members and their Employer, will provide a retirement amount with which the member can purchase a pension annuity (or other type of retirement product). The Defined Contribution SIP outlines the investment objectives and strategy for the Defined Contribution assets of the Group.

The investment funds offered to members are provided by Prudential (MEPS Category) and Aegon (EGPS Category) and cover a range of asset classes. The day to day management of the underlying investments of the funds is the responsibility of the providers, including the direct management of credit and market risks.

The Group Trustees monitor the underlying risks by regular investment reviews.

The risks disclosed relate to the Defined Contribution (DC) Section's investments as a whole. Members are able to choose their own investments from the range of funds offered by the Group Trustees, and therefore, may face a different profile of risks from their individual choices compared with the Section as a whole.

Credit Risk

The DC Section is subject to direct credit risk in relation to the providers through their holdings in unit linked insurance funds.

The providers are regulated by the Financial Conduct Authority and maintain separate funds for their policy holders. The Group Trustees monitor the creditworthiness of the providers by reviewing published credit ratings. In the event of default by the providers the members may be entitled to limited compensation from the Financial Services Compensation Scheme.

The DC Section is also subject to indirect credit and market risk arising from the underlying investments held in the investment funds. Member level risk exposures will be dependent on the funds invested by members.

At the Group year-end the Bond, Cash and Diversified Growth funds were exposed to underlying credit risk.

Market risk

The Group's DC Section is subject to indirect foreign exchange, interest rate and other price risk arising from the underlying financial instruments held in the funds managed by the providers.

Fund	Exposed to:	Currency risk	Interest rate risk	Other price risk
Equity funds		✓	-	✓
Bond funds		✓	✓	-
Cash funds		✓	✓	-
Diversified growth fund		✓	✓	✓

19. Current assets

	DB 2021 £million	DC 2021 £million	**Total 2021 £million**	*DB 2020 £million*	*DC 2020 £million*	*Total 2020 £million*
Amounts due in respect of:						
Contributions due from the Employers	2.9	-	**2.9**	*4.7*	-	*4.7*
Contributions due from Employees	0.1	-	**0.1**	-	-	-
VAT recoverable and expense accruals	0.4	-	**0.4**	*1.0*	-	*1.0*
Cash balances	0.2	0.2	**0.4**	*0.9*	*0.1*	*1.0*
	3.6	0.2	**3.8**	*6.6*	*0.1*	*6.7*

All contributions due to the Group at the year-end relate to March 2021 and March 2020 and were paid in full to the Group in accordance with the Schedule of Contributions.

At 31 March 2021, £139,601 (*2020: £24,945*) was held as cash designated to members and £32,262 (*2020: £33,355*) was held as undesignated cash.

20. Current liabilities

	DB 2021 £million	DC 2021 £million	**Total 2021 £million**	*DB 2020 £million*	*DC 2020 £million*	*Total 2020 £million*
Benefits payable	(0.6)	(0.1)	**(0.7)**	*(1.4)*	-	*(1.4)*
Payments to and on account of leavers	-	(0.9)	**(0.9)**	-	-	-
Accrued expenses	(0.7)	-	**(0.7)**	*(0.6)*	-	*(0.6)*
	(1.3)	(1.0)	**(2.3)**	*(2.0)*	-	*(2.0)*

21. Related party transactions

Other than as disclosed elsewhere in the notes to the financial statements, related party transactions and balances comprise:

Key management personnel

Contributions and contributions receivable in respect of 2 (*2020: 2*) Group Trustees during their time as Group Trustees, and pensions paid in respect of 6 (*2020: 5*) Group Trustees during their time as Group Trustees, all in accordance with the Trust Deed and Rules

In the year to 31 March 2021 fees and expenses of £186,435 (*2020: £182,078*) were paid to certain Group Trustees from the Group.

Employers and other related parties

Administrative services of £146,527 (*2020: £180,274*) provided by the Employer and recharged to the Group and are accounted for within administrative expenses.

22. Contingent liabilities and contractual commitments

The Group has undertaken a process of assessing the overall impact of the October 2018 ruling regarding GMP Equalisation and based on an initial assessment by the actuary, an estimate of £8 million has been determined for the full liability. The Group Trustees have not included a liability in respect of these matters in these Financial Statements. They will be accounted for in the year they are determined.

On 20 November 2020, the High Court handed down a further judgment on the GMP equalisation case in relation to the Lloyds Banking group pension schemes. This follows from the original judgement in October 2018. This latest judgment confirms that defined benefit schemes which provide GMPs need to revisit and where necessary top up historic Cash Equivalent Transfer Values that were calculated based on unequalised benefits. The issues determined by the judgment arise in relation to many other defined benefit pension schemes. The Group has historical transfers which may be subject to adjustment as a result of this second ruling. The Group Trustees will be considering this at a future meeting and decisions will be made as to the next steps. Any adjustments necessary will be recognised in the Financial Statements in future years. At the date of signing these Financial Statements, it is not possible to estimate the value of any such adjustments at this time.

In the opinion of the Group Trustees, other than the matter detailed above, the Group had no (2020: none) contingent liabilities entered into which are not provided for in these Financial Statements.

23. Subsequent events

There are no subsequent events requiring disclosure in the Financial Statements.