

Limitations of Reliance

Towers Watson Limited ("WTW") ("we/our/us") has addressed this material to the Trustee of the Babcock International Group Pension Scheme ("the Trustee" of "the Scheme") to assist in the governance and oversight of the monitoring of the DC Section that forms part of the Scheme under our terms of agreement with you. It may not be suitable for use in any other context, for any other purpose or by any other party; we accept no responsibility for any such use. Any reliance placed on this material for another purpose, or by other parties is entirely at their own risk. This material should not be shared with any third party unless we agree in writing.

This material is based on information available to WTW at 6 September 2024 and takes no account of subsequent developments. In preparing this material we have relied upon data supplied to us by third parties. Whilst reasonable care has been taken to gauge the reliability of this data, we provide no guarantee as to the accuracy or completeness of this data and WTW accepts no responsibility and will not be liable for any errors or misrepresentations in the data made by any third party.

Our opinions and ratings on providers are not intended to imply, nor should be interpreted as conveying, any form of guarantee or assurance by us of the future performance of the provider in question, either favourable or unfavourable.

- Some general limitation on reliance should be noted:
 - Past performance should not be taken as representing any particular guide to future performance;
 - The value of investments can go down as well as up, and an investor might not receive back as much as they originally invest.
- We note that some or all of the providers considered in this material/review may be clients of WTW.



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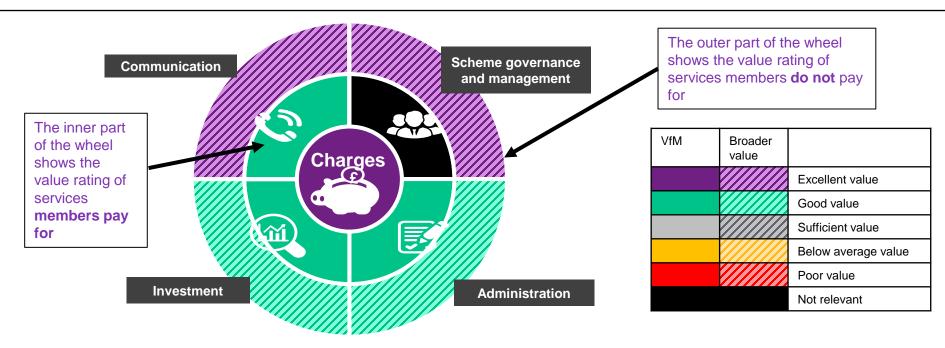
Executive summary

Value for members ('VFM')

We believe that the combined value provided to members by the DC Section's governance and management, administration, investment and communication services and features offers **good to excellent value for members** when compared with the overall level of charges met by members. The DC Section provides good quality services that are expected to meet the specific needs of the DC Section membership.

Scheme Governance and Management continues to offer **Excellent Value** due to a dedicated DC Committee responsible for the monitoring and oversight of the DC Section and its associated practices including a solid governance framework, well maintained risk register, with additional support from the Group Pensions Department and external professional advisers as required.

Communications also continue to offer **Excellent Value** reflecting the additional engagement opportunities available to members via OneDay and MyWorkplace.



Mark Norris, Director

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September 2024

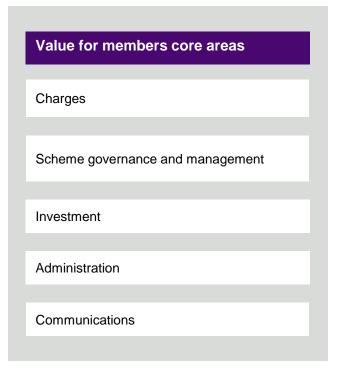
Towers Watson Limited (a WTW company) is authorised and regulated by the Financial Conduct Authority.

Assessment of elements that influence value

The Pensions Regulator has recommended that, in order to assess the value that members receive, trustees need to consider three aspects:

- 1. Identify what members pay for Identify those services and features that fall under the legal value for members requirements, and which are elements of broader value.
- 2. **Need** The Trustee must consider the need for the service from members. This covers both the appropriateness of a service for the membership, as well as the actual and perceived value members gain.
- **3. Performance** The Trustee must consider the quality of the service to meet the need. This should look at the current service provided, the performance of the service provider and how well this meets the needs of the membership.

Throughout the assessment we look to document the Trustee's views on the need and the performance under the key areas of scheme governance and management, administration, investment and communications and relate these back to the Scheme charges – which are paid by members. We also look to reference the supporting evidence used to form and support the assessment.



Value for members – Charges and transaction costs

Scheme management charges

- The competitive member charges are due to the Trustee using the DC Section's profile and notable assets under management to negotiate significant cost savings on the fund charges.
- The Total Expense Ratio ('TER') for the funds available ranges from 0.21% to 1.12% and are competitive compared with other comparative DC arrangements.
- The TER for the growth phase of the default investment option (global equity) is 0.25% which is significantly below the charge cap (0.75%).

Transaction costs

- Transaction costs are those incurred by fund managers as result of buying, selling, lending or borrowing investments.
- We have set out the transaction cost information provided by Aviva on Page 13.
- The transaction costs range from **0% to 0.1025%** over the course of the Scheme year.
- The FCA has stipulated that a calculation methodology called 'slippage cost' should be used for transaction costs. This
 calculates the difference between the expected price of trading a fund's underlying investment (e.g. company shares or bonds)
 at the time the order is raised by the fund manager and the price at which the trade is actually executed on the relevant market.
- One consequence of this calculation method is that, rather than generating a cost, it can result in a profit (also known as a 'negative cost'). This can happen, for example, when the actual price paid in buying an investment is lower than the expected price.
- Please refer to Page 14 which shows the DC Section charges in absolute and relative terms. We conclude that, in isolation, the charges represent **excellent value for members**.

Scheme governance and management

Members do not meet or contribute towards the cost of the governance and management of the DC Section. We have, therefore, assessed this area in the broader context and have excluded it from our formal assessment of VFM.

Need

It is evident that a well-run pension plan, delivering good member services and outcomes can only be achieved through the maintenance of a strong governance and management framework. This need is a cornerstone of the Pension Regulator's own beliefs.

Performance

- We believe that the oversight and management by the Trustee adds material value to members. The Trustee oversight of the DC Section includes:
 - A dedicated 'DC Committee' comprising of Trustee Directors is responsible for the monitoring and oversight of the DC Section.
 - The DC Committee operates a governance framework to co-ordinate and help manage its oversight and risk management activities on a regular basis.
 - A risk register is maintained and reviewed regularly.
 - Where appropriate, the DC Committee utilises services of the Group Pensions Department and external professional advisers to support its activities.
 - Identifying areas where further communication may be required to assist members with managing their pension arrangements and understanding the risks.
 - Efficient and productive relationship between the Trustee and the Company.
 - Regular catch-up meetings with senior personnel within Aviva to ensure 'Scheme voice' is heard.

Although the cost of scheme governance and management is not met by members, and so falls outside of the legal definition, we believe that the Trustee provides excellent value to members in the areas listed above.

Rating

We conclude that under the key area of scheme governance and management the DC Section provides excellent value for members.

Administration

The DC Section is a bundled arrangement with administration services provided by Aviva. All administration costs are met by the members via the charges on funds in which they invest.

Need

Members have a need for accurate and up-to-date information on their fund value and investment performance. Members also have a need for prompt and accurate processing of tasks such as fund switches, retirement quotations and contribution investments. Given this tends to be the area where most complaints are raised across the industry, the need for high quality administration is evident.

Performance

Aviva generally provides a good quality service to members. Performance remained stable during the last year, with Aviva processing on average 99% of tasks within SLA.

The project to outsource a significant proportion of Aviva's back-office administration to Diligenta completed at the end of May 2022. Since this time the administration has been strong and stable.

Aviva continues to work with the Babcock Group Pensions Team regarding the development of new features on My Workplace. Various member communications have been issued to better engage with members on retirement saving.

Rating

We therefore believe that the overall value offered by the DC Section under the key area of administration offers good value for members.

Investment (1)

Investment costs are met by members via the charges on funds in which they invest.

Need

Around 97% of the DC Section's membership assets were invested in the default option as at 31 March 2024, demonstrating that there is a strong need for a well-designed and governed default investment strategy.

Strategy

The Trustee undertook a triennial investment strategy review in February 2022 and did subsequent work in October 2022. The review focused on the appropriateness of the current default strategy based on member demographics and member retirement behaviour. The review work carried out by WTW provided the following conclusions/recommendations:

- The average member fund value was increasing with a consequent expectation that members would shift from taking cash at retirement to income drawdown becoming more favoured.
- Propose a change of the default from the Target Cash Lifestyle to the Target Flexibility Lifestyle (to target an income drawdown outcome at retirement).
- Map all members more than five years from TRA from the current to the new default, giving members the option to opt-out of this investment change if
 they wished to do so. This would only impact the future asset allocation as both lifestyles are currently identical until five years prior to retirement.
 Members within five years of their TRA would be excluded from the automatic mapping to the new default but would have option to out-in to this
 move.
- Change the Target Flexibility Lifestyle's de-risking path during the final five years and increase the cash allocation from 10% to 30% at the point of
 retirement and remove the level annuity fund, increasing the capital protection.

Whilst the Trustee was comfortable with the recommendations made at that time, the implementation of these changes has remained on hold given the Company's proposed move to a Master Trust. This created several considerations regarding the potential implementation of investment changes which may only have a short-term benefit. The Trustee has kept this situation under close review throughout the year.

The Q1 2023 and Q1 2024 high-level reviews also considered the range of alternative investment choices and their continued suitability, with the Q1 2024 review focused on specific funds whose performance had suffered during periods of market volatility. Following these reviews, the DC Committee agreed that these funds, as well as the number of funds available and asset classes covered, remained appropriate.

Investment (2)

The Trustee and its investment adviser undertake regular monitoring of the DC Section's investment fund performance on a gross and net fee basis, that includes the default lifestyle strategy and the self-select fund range. This monitoring takes place quarterly with the results presented at each DC Committee meeting. As most funds are passively managed the focus is on ensuring that the funds are performing in line with their underling indices (benchmarks). Any deviations from this have been investigated to the DC Committee's satisfaction.

The Trustee undertook Security of Assets assessments in 2021 and 2022 and high-level reviews in 2023 and 2024 which showed the Scheme's position was consistent with that of its peers and that it was a low-risk area given Aviva's financial strength and the regulatory regime but should be kept under consideration.

Rating

We therefore believe that the overall value offered by the DC Section under the key area of investment offers good value for members.

Communications

The DC Section provides a number of bespoke member communications, some of which are provided by Aviva and others which have been developed by the Trustee with their communications consultant. The cost of these communications is met by a combination of the Company and by members via the charges on funds in which they invest.

Need

Good communication is important as it enables members to develop a greater understanding of the Scheme and the options available – which should lead to improved outcomes at retirement.

Performance

The DC Section provides many services which enable members to access information about their DC accounts. The key areas include:

- Member booklet and investment guides.
- A bespoke pension website (OneDay... which includes financial education videos).
- Annual newsletter & Eforms.
- Dedicated member helpline.
- Online access to their accounts and online modelling tool.
- Access to a whole of market annuity broking service.
- Occasional on-site face to face sessions provided by Aviva personnel.
- Monthly online Aviva presentations covering the basics of pensions and fixed quarterly retirement presentations.
- MyWorkplace launched at the end of 2021.
- E-mail reminders, periodic nudges.

The communication materials provided by Aviva have improved in recent years and are now well-rated by the Trustee's professional advisers. In addition, the Trustee has augmented the Aviva communications with its own dedicated website OneDay to enhance the member experience. We note that further consideration is ongoing on how to improve the member journey.

Rating

We therefore believe that the overall value offered by the DC Section under the key area of communication offers **good value for members**. However, in the broader sense, the Scheme provides **excellent value for members** as a result of the development of OneDay and continuing development of MyWorkplace.

Conclusion and next steps

Conclusion

The Trustee, with assistance from its advisers, has considered the services and features of the DC Section that influence value. The need for each service has been considered as well as the performance of the service to meet this need.

Based on this assessment of the DC Section, we believe that the combined value provided to members by the Scheme in the various areas of governance and management, administration, investment and communication services and features is **good** to **excellent** when compared with the overall level of charges met by members. The DC Section continues to provide high quality and appropriate services to meet the needs of the DC Section membership that have been identified.

Next steps

The Trustee is required to publish its Chair's Statement for the 2023/24 Scheme year. The output of this report should be referenced in the Chair's Statement.

We do not believe there to be any areas of poor/below average value which would require the Trustee to take new actions. The Trustee should continue to monitor value for members as part of its standard governance processes.

Value for members – Charges and transaction costs for 2023/2024

Fund Name	Total Expense Ratio	Total transaction costs
AV Global Equity (BIGPS)	0.25% pa	0.0247%
AV Diversified Growth (BIGPS)	0.38% pa	0.0000%
AV Emerging Market Equity (BIGPS)	0.46% pa	0.0620%
AV Target Level Annuity (BIGPS)	0.29% pa	0.0000%
AV Target Increasing Annuity (BIGPS)	0.21% pa	0.0168%
AV Stewardship	0.27% pa	0.0501%
AV Money Market (BIGPS)	0.21% pa	0.0155%
AV HSBC Islamic Global Equity	0.51% pa	0.0146%
AV Climate Focused (BIGPS)	1.12% pa	0.1025%

Source: Aviva. TERs can change from time to time.

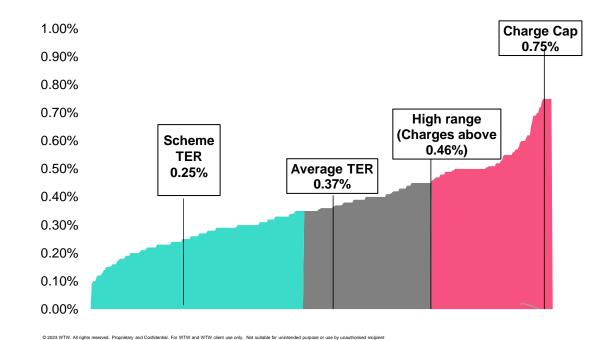
Value for members - Charges

The Scheme's TER of 0.25% pa fo the default fund (growth fund) is below that of an average scheme and below that of the charge cap.

The Scheme's TER of 0.25% pa for In this chart we have shown how the Scheme charges compare against other pension arrangements.

The Scheme's charges are expressed as a TER, which includes the annual management charges and additional expenses. This amounts to 0.25% pa for the Scheme's default fund (growth fund) and is below the average TER of other DC arrangements. This comparison is against schemes of all sizes and structures as the perceived value a member gets from the charges will not reflect the size of the Scheme.

We conclude that, in isolation, the charges represent Excellent value for members.



How the fee benchmarking works

We have benchmarked fees by comparing the Scheme's default fund (growth fund) TER against the default fund charges of other schemes at WTW. The fees are inclusive of the standard charges for communication, investments, administration and scheme governance and management. We have used the cost of accessing the default fund across all schemes, regardless of the underlying structure of the default investment option.