Statement of Investment Principles

This is the Statement of Investment Principles (the "Statement") made by the Trustee of the Scottish Hydro-Electric Pension Scheme ("the Scheme") in accordance with the Pensions Act 1995 (as amended). It is subject to periodic review by the Trustee at least every three years and without delay after any significant change in investment policy.

In preparing this Statement, the Trustee has consulted with the Sponsoring Employer, SSE Plc ("the Company") and has taken written advice from the Investment Practice of Hymans Robertson LLP.

Further details on how the investment policy of the Scheme is implemented are set out in the "Investment Implementation Document", which is maintained by the Trustee. This document can be made available by the Trustee upon request.

Scheme objective
The Scheme's funding objective is set out in detail in the Statement of Funding Principles based on the 31 March 2024 valuation. The main objectives are as follows.

Funding objective
The Trustee is required to adopt a 'statutory funding objective'. The statutory funding objective is that the Scheme must have 'sufficient and appropriate' assets to meet the expected cost of providing members' past service benefits, which we refer to as 'technical provisions'.[1]

In addition to the statutory funding objective, the Trustee has a long-term objective to be fully funded on a 'gilts basis'. This strategic objective is intended to be a proxy for a level at which:

- the Trustee could invest the assets in a very low risk strategy (largely matched to the liabilities) to minimise the risk of shocks to the funding level, with a strong emphasis on meeting cashflow requirements
- the probability of being able to pay all benefits is high and the likelihood of having to ask the Sponsor for further contributions will be low
- it is likely to be possible to buy in/out more, or even all, of the liabilities.

The Trustee has reached this objective and plans to maintain this level of funding through a combination of further employer contributions to meet benefit accrual (if required) and investment returns.

Appropriateness
The policy for ensuring the appropriateness of the assets is set out in this Statement of Investment Principles.

Investment strategy
The Trustee has translated the Scheme's funding objectives into a suitable strategic asset allocation benchmark for the Scheme. All day-to-day investment decisions have been delegated to a number of authorised investment managers. The strategic benchmark has been translated into benchmarks for the individual managers, which are consistent with the Scheme's overall strategy. The Scheme benchmark is consistent with the Trustee's views on the appropriate balance between seeking an enhanced long-term return on investments and accepting greater short-term volatility and risk.

[1] The phrase used in the legislation to refer to the expected cost of providing members' past service benefits.

The investment strategy takes due account of the maturity profile of the Scheme (in terms of the relative proportions of liabilities in respect of pensioners and non-pensioner members), together with the level of disclosed surplus or deficit on a gilts basis.

It is intended that the investment strategy will be reviewed at least every three years following actuarial valuations of the Scheme but will normally be reviewed annually. Written advice is received as required from professional advisers.

To achieve its objectives, the Trustee has agreed the following:

Choosing investments

The Trustee has appointed a number of investment managers who are authorised under the Financial Services and Markets Act 2000 to undertake investment business. The Trustee has delegated all day-to-day investment decisions to these authorised investment managers. The Trustee, after seeking appropriate investment advice, has given the managers guidelines as to the asset allocation, including control ranges for each asset class and/or geographic region. Subject to their respective benchmarks and guidelines, the managers are given full discretion over the choice of investments and are expected to maintain diversified portfolios.

The Trustee reviews the nature of Scheme investments on a regular basis, with particular reference to suitability and diversification. The Trustee seeks and considers written advice from a suitably qualified person in undertaking such a review. If at any time investment in a security or product not previously known to the Trustee is proposed, appropriate advice is sought and considered to ensure its suitability and diversification.

Kinds of investment to be held

The Scheme may invest in quoted and unquoted securities of UK and overseas markets including equities, fixed interest and index-linked bonds, cash, property and pooled funds. Where invested in pooled funds, the Trustee is satisfied that the funds selected are consistent with the objectives of the Scheme, particularly in relation to diversification, risk, expected return and liquidity. The Scheme may also make use of derivatives and contracts for difference (or in pooled funds investing in these products) for the purpose of efficient portfolio management, as well as annuity contracts. The Trustee considers all of these classes of investment to be suitable in the circumstances of the Scheme.

Investment strategy

The investment managers are instructed to deliver a specific performance target that will align overall to deliver the broader Scheme’s investment strategy. The Trustee ensures that all manager engagements have clearly defined benchmarks, objectives and management parameters.

Where appropriate, and where commercial considerations permit, the terms of each mandate and the basis on which the manager is engaged will be defined specifically for the Scheme. Where such tailoring is not directly achievable or appropriate, the Trustee will invest in pooled funds where the objectives of the fund and the policies of the investment manager will be evaluated by the Trustee to ensure that they are appropriate for the needs of the Scheme. The Trustee is satisfied that the pooled funds selected are consistent with the objectives of the Scheme, particularly in relation to diversification, risk, expected return and liquidity.

Investment management remuneration

Remuneration for each mandate is determined at its inception, based on commercial considerations and typically set on an ad valorem basis (i.e. fees paid as a percentage of assets under management). Where appropriate to the nature of the mandate, the term of the mandate and the role the mandate plays within the investment strategy, the Trustee may agree to a fee structure where the manager is incentivised to deliver outperformance relative to an agreed benchmark, typically in conjunction with a lower ad valorem fee. The Trustee periodically reviews the fees paid to all of its managers against industry standards.

Investment time horizon

The Trustee recognises the long-term nature of the Scheme's liability profile and appoints its managers to invest in a way that generates long-term sustainable returns. The Trustee will carry out necessary due diligence on the underlying investment decision-making process to ensure the manager makes investment decisions over an appropriate time horizon aligned with the Scheme's objectives.

The duration of each mandate is determined by the Trustee at its inception. For open-ended investments, the Trustee generally engages with managers on an ongoing basis with no pre-determined term of appointment. For such mandates, the Trustee expects the minimum duration of the appointment will be five years, this being the period over which performance of the mandate can be appropriately evaluated. However, all mandates are subject to ongoing review against various financial and non-financial metrics in addition to their continued appropriateness within the investment strategy. For closed-ended investments, the Trustee expects the term of the appointment to be the lifetime of the investment.

Balance between different kinds of investments

The Scheme's investment managers will hold a mix of investments that reflect their views relative to their respective mandates and benchmarks. Within each major market relevant to a manager's mandate, each manager will maintain a diversified portfolio of underlying assets through direct investment or pooled vehicles.

Expected return on investments

The investment strategy aims to achieve a return on Scheme assets that, taken in conjunction with any contributions, is sufficient over time to match growth in the Scheme's pension liabilities.

Realisation of investments

The bulk annuity insurance contracts that the Trustee has entered into cannot be realised but provide monthly income to meet a proportion of the Scheme's benefit payments. Of the assets held in respect of non-insured liabilities, property, private equity and unquoted fixed income investments may be difficult to realise quickly in certain circumstances.

Risk Management

The Scheme is exposed to a number of risks which pose a threat to meeting its objectives. The Trustee's risk management approach is focused around seven principal risks, which the Trustee deems to be the risks that could have the most significant impact on the Scheme.

The seven principal risks monitored are:

- Actuarial – The risk associated with the Trustee's reliance on the accuracy of actuarial calculations and assumptions.
- Strategic – The risk associated with the Trustee either not having an appropriate long-term strategy in place, or a failure to align with the Company or otherwise execute the long-term objective.
- Financial, Liquidity & Demographic – The risk associated with the Scheme's exposures to interest rates, inflation, foreign currencies, longevity (and the accuracy of hedging actions taken to mitigate these) and exposure to the sponsor covenant and counterparties.
- Political and Regulatory Change – The risk of political intervention resulting in changes to the Trustee's legal and/or regulatory obligations.
- Cyber Security & Systems Resilience – The risk that key infrastructure, networks or core systems on which the Trustee relies are compromised or otherwise rendered unavailable.

- Governance, Oversight & Compliance – The risk associated with the Trustee's obligations to meet its legal, regulatory and fiduciary duties to its members and its reliance on the successful management and oversight of key third-party service providers to meet these obligations.
- Scheme Administration – The risk associated with the Trustee's obligations to ensure pension payments and quotations are correct and on time and that member experience is sufficiently positive so as to not interfere with the running of the Scheme.

The Trustee believes that each of the following sub risks affecting the Scheme are captured by one or more of the above principal risks:

Funding risks:

- Financial mismatch – The risk that Scheme assets fail to grow in line with the developing cost of meeting Scheme liabilities.
- Changing demographics – The risk that longevity improves, and other demographic factors change increasing the cost of Scheme benefits.
- Systemic risk – The possibility of an interlinked and simultaneous failure of several asset classes and/or investment managers, possibly compounded by financial 'contagion', resulting in an increase in the cost of meeting Scheme liabilities. Climate change is a particular systemic risk that has the potential to cause economic, financial and demographic impacts.

The Trustee measures and manages funding risks in a number of ways:

- The Trustee has set a strategic asset allocation benchmark for the Scheme. The Trustee assesses risk relative to that benchmark by monitoring the Scheme's asset allocation and investment returns relative to the benchmark. The Trustee also assesses risk relative to liabilities by monitoring the delivery of benchmark returns relative to liabilities.
- The Trustee keeps under review mortality and other demographic assumptions that could influence the cost of the benefits. These assumptions are considered formally at each triennial valuation.
- The Trustee has entered into bulk annuity insurance contracts in respect of a proportion of pensioner liabilities to help manage and reduce these risks. In return for the payment of one-off, up front premiums, the Trustee holds annuity policies with an insurer. Under each policy, the insurer makes monthly payments to the Scheme and carries the risk of longevity for a subset of the pensioners, as well as the investment risks for this proportion of the Scheme's assets.
- The bulk annuity insurance contracts into which the Trustee has entered are subject to various layers of security. Regulation of life insurance in the UK is monitored by the Prudential Regulation Authority (PRA) which serves to protect policyholders in the event an insurer goes bankrupt. The Financial Services Compensation Plan (FSCS) intends to provide 100% compensation in the event of insurance policy default.
- All pensioners continue to be members of the Scheme, and the Trustee continues to have ultimate responsibility for the payment of benefits to its members.
- The Trustee seeks to mitigate systemic risk through maintenance of a diversified asset portfolio. However, it is not possible to make specific provision for all possible eventualities that may arise under this heading.

Asset risks

- Concentration – The risk that significant allocation to any single asset category and its underperformance relative to expectation would result in difficulties in achieving funding objectives.

- Illiquidity – The risk that the Scheme cannot meet its immediate liabilities because it has insufficient liquid assets.
- Manager underperformance – The failure by the fund managers to achieve the rate of investment return assumed in setting their mandates.
- Currency risk – The risk that the currency of the Scheme's assets underperforms relative to Sterling (i.e. the currency of the liabilities).
- Environmental, Social and Governance (ESG) risks – The extent to which ESG issues are not reflected in asset prices and/or not considered in investment decision making leading to underperformance relative to expectations.
- Climate risk – The extent to which climate change causes a material deterioration in asset values as a consequence of factors including but not limited to policy change, physical impacts and the expected transition to a low-carbon economy.

The Trustee measures and manages asset risks in a number of ways.

- The Trustee ensures that there is sufficient diversification across a range of asset classes and within each asset class to reduce potential concentration risks.
- The Trustee reviews the Scheme's cashflow policy on an annual basis and monitors liquidity monthly.
- Each of the Scheme's mandates have a defined objective, benchmark, guidelines and constraints, which ensure that the risks within it are limited.
- The majority of the Scheme's mandates are sterling denominated or the manager is expected to hedge currency exposures back to sterling.
- The approach to the consideration of ESG risks including climate risk is set out in further detail below.

Other provider risks

- Transition risk – The risk of incurring unexpected costs in relation to the transition of assets among managers. When carrying out significant transitions, the Trustee seeks professional advice and considers the appointment of specialist transition managers.
- Custody risk – The risk of losing economic rights to Scheme assets, when held in custody or when being traded.
- Counterparty risk – The possibility of default of a counterparty in meeting its obligations.
- Operational risk – The risk of loss as a result of fraud, cyber attacks, poor advice, acts of negligence or lack of suitable process.
- Legislative and regulatory risk – The risk that managers of the Scheme fail to comply with changes in relevant legislation or regulation.

The Trustee's regular and project activities are framed in the context of these principal risks. Further, meeting agendas are structured in line with the seven principal risks to ensure that sufficient time is being spent on each. Each principal risk has been allocated the oversight of a Trustee Director who will be closely involved with any work relating to that risk.

The Trustee monitors and manages risks in these areas through a process of regular scrutiny of its providers and audit of the operations they conduct for the Scheme. In some cases, the Trustee has delegated such monitoring and management of risk to the appointed investment managers as appropriate (e.g. custody risk in relation to pooled funds).

Manager engagement

Performance evaluation

The Trustee does not expect managers to take excessive short-term risk and carries out regular monitoring of the Scheme's investments and managers. This monitoring includes a review of investment performance of each manager relative to their respective benchmark or performance target on a short-, medium- and long-term basis. The monitoring of the Scheme's investments and managers also includes a review of strategic and funding risks.

The Trustee also seeks information from its investment managers on meeting objectives of the mandates and exercising stewardship responsibilities including engagement with issuers (as set out in greater detail in the section on Stewardship) and the management of risks. Material deviation from performance or risk targets is likely to result in the mandate being formally reviewed.

The Trustee requests input and analysis from its investment advisers to support any such review of, and engagement with, its investment managers. Where necessary, the Trustee will highlight any areas of concern identified during such reviews to the manager as part of its engagement process and request that the manager takes appropriate action. This may include concerns over performance, risk management, stewardship practices, investment process and operational issues and, where such concerns are raised, the Trustee will require the manager to demonstrate levels of improvement. Failure to achieve the desired improvements is likely to result in the mandate being reduced or terminated.

Portfolio turnover

The Trustee has an expectation on the level of turnover within each mandate, which is determined at the inception of the mandate, based on the Trustee's knowledge of the manager, investment process and the nature of the portfolio. While the Trustee expects performance to be delivered net of costs, including the costs of trading within the portfolio, the Trustee expects managers to report at least annually on the underlying assets held within the portfolio and details of transactions over the period. The Trustee will challenge the manager if there is a sudden change in portfolio turnover or if the level of turnover seems excessive.

The Trustee will request turnover costs incurred by the asset manager over the Scheme's reporting year.

Consideration of financially material factors in investment arrangements

The Trustee recognises that the consideration of financially material factors over the appropriate time horizon of the investments, including ESG factors, is relevant at different stages of the investment process. The Trustee further recognises that the financial materiality of any factor, including ESG factors, is context specific and that while some factors may be relevant to certain stocks/assets, they may not be relevant to others.

The Trustee will consider such factors in the development and implementation of its investment arrangements for the purposes of determining the selection, retention and realisation of investments where there is sufficient data or evidence to allow the Trustee to systematically do so. Where there is not sufficient data or evidence, the Trustee will require that its investment managers take such considerations into account within their decision-making. The Trustee has explicitly acknowledged the relevance of ESG factors in framing its investment beliefs and these beliefs are detailed in the Trustee's separate Responsible Investment policy, reflected in the principles set out below and the broader implementation of strategy.

Strategic considerations

The strategic benchmark has been determined using appropriate long-term economic and financial assumptions from which expected risk/return profiles for different asset classes have been derived. These assumptions apply at a broad market level and are considered to implicitly reflect all financially material factors.

The Trustee has discussed climate change risk with its investment adviser and actuary but, given the inherent uncertainty, it has not made explicit allowance for the risks of climate change in setting its strategic benchmark. The Trustee reviews its managers' ESG policies on an annual basis and actively challenges the managers where appropriate.

Structural considerations

Given the discretion afforded to the active investment managers, the Trustee expects that the managers will take account of all financially material factors including the potential impact of ESG factors in the implementation of its mandates.

Within active mandates, the Trustee has delegated responsibility for the consideration of stock-specific issues to its individual investment managers.

The Trustee has discussed the extent to which ESG issues and climate change risk, where relevant to the investment mandate, are integrated into the investment processes of its investment managers. The Trustee is satisfied that the investment managers are following an approach that takes account of all financially material factors in relation to the respective mandates.

Selecting new investment managers

In selecting new investment managers for the Scheme, the Trustee explicitly considers potential managers' approach to responsible investment and the extent to which the managers integrate ESG issues in their investment processes, as a factor in their decision-making.

Consideration of non-financially material factors in investment arrangements

The Trustee has not considered any non-financially material factors in the development and implementation of the Scheme's investment strategy. The Trustee has not imposed any restrictions or exclusions to the investment arrangements based on non-financially material factors.

Stewardship

The Trustee recognises that stewardship encompasses the exercise of voting rights, engagement by and with investment managers and the monitoring of compliance with agreed policies.

The Trustee has selected the following as priority stewardship themes to help guide discussions with appointed investment managers and to report on significant votes in the preparation of the Scheme's annual implementation statement. These themes will be reviewed annually:

- Climate Change
- Modern Slavery
- Board Composition

Voting and engagement

The Trustee has adopted a policy of delegating voting decisions to its investment managers on the basis that voting power will be exercised by them with the objective of preserving and enhancing long-term shareholder value. The investment managers are expected to exercise the voting rights attached to individual investments in accordance with their own house policies and taking account of current best practice including the UK Stewardship Code. On an annual basis, the Trustee will request that its investment managers provide details of any change in their policies. The Trustee annually reviews the investment managers' adherence to the UK Stewardship Code, UNPRI and other relevant industry codes or standards where applicable. In the event that a manager does not adhere to a recognised set of principles for responsible investment, the Trustee will take reasonable steps to ensure that it is comfortable with the policy that the manager has in place in respect of this.

The Trustee does not engage directly but expects its investment managers to engage with key stakeholders, which may include corporate management, regulators and governance bodies relating to its investments in order to consider the management of conflicts of interest and improve corporate behaviours, improve performance and mitigate financial risks. Where necessary, investment managers are expected to notify the Trustee of any issue on which it may be beneficial for the Trustee to undertake further engagement. The Trustee will review engagement activity undertaken by its investment managers as part of its broader monitoring activity.

Responsibility for investment decisions has been delegated to the investment managers, including consideration of the capital structure of investments and the appropriateness of any investment made. Where managers are responsible for investing in new issuance, the Trustee expects the manager to engage with the issuer about the terms on which capital is issued and the potential impact on the rights of new and existing investors.

The Trustee separately considers any conflicts of interest arising in the management of the Scheme and its investments and has ensured that each manager has an appropriate conflicts of interest policy in place.

Monitoring
The Trustee will formally review the voting behaviour of the Scheme's investment managers on an annual basis in conjunction with producing an implementation statement. Where the Trustee deems it appropriate, it will proactively engage with the managers to raise any issues of concern and request further explanation.

The Trustee meets with all of its investment managers regularly. The Trustee provides its managers with an agenda for discussion, which will include ESG issues. Managers are challenged both directly by the Trustee and by its investment advisers on the impact of any significant issues, including ESG issues, that may affect the prospects for return from the portfolio.

The Trustee maintains a regular engagement programme with its investment managers and records a log of these engagement activities. Should the Trustee have a specific concern, it may decide to bring a manager meeting forward on the meeting schedule to ensure timely discussions and challenge.

Additional Voluntary Contributions (AVCs)
The Trustee gives members the opportunity to pay additional contributions to purchase additional service within the Scheme.

Governance arrangements
There are a number of parties involved in the Scheme's investment arrangements. The Trustee has ultimate responsibility for the management of the Scheme and its investments but delegates a number of decisions and responsibilities to specialist advisers and fund managers.

The Trustee confirms that all parties to whom responsibility has been delegated have the appropriate knowledge and experience required to take on this role. The Trustee expects each party to carry out the duties delegated to them giving effect to the principles in this statement insofar as is reasonably practical.

The Trustee has set guidelines and restrictions within which its advisers and investment managers can act. More detail on how the responsibilities are divided between the parties involved is set out in the Investment Implementation Document.

Signed For and on Behalf of the Trustee of the Scottish Hydro-Electric Pension Scheme

Trustee Director	Date
Trustee Director	Date