

CHAIR'S ANNUAL REPORT:
The PTL Governance Advisory Arrangement
Equitable Life workplace personal pension plans

March 2017

1. Introduction and Executive Summary

This report on the workplace personal pension plans provided by Equitable Life has been prepared by the Chair of the PTL Governance Advisory Arrangement (“the GAA”). It is our second annual report.

This report sets out our assessment of the value for money delivered to policyholders (see Section 2). It also explains the background and credentials of the GAA (see Appendix 3). The GAA works under Terms of Reference, agreed with Equitable Life, dated 9 November 2015. These are publicly available (see Appendix 3).

The workplace personal pension plans provided by Equitable Life are all Grouped Personal Pensions (GPPs). Policies have been divided into three groups, where different charges or with-profits guarantees apply. More details about the numbers of policyholders and their funds are shown in Appendix 1.


The GAA believes that deciding what represents “value for money” is subjective and that value for money will mean different things to different people. We think value for money can be best judged by looking at the balance of all the costs paid by policyholders against the benefits and services provided from their policy.

The GAA’s opinion on the value for money delivered is that the GPPs offer reasonable to good value for money.

See Section 2 and Appendix 2 for more details of the value for money assessment.

A colour-coded summary of our value for money assessment for different policy types is shown below:

	Grouped Personal Pensions
Investments	
Communications and support	
Risk Management: Operational and Financial	
Other factors: administration, options at retirement, etc.	
Overall benefit:	
Level of charges	
Overall value for money assessment	



The GAA has not formally raised any concerns with Equitable Life during the year but a number of challenges were raised (see Section 3.2).

Arrangements have been put in place to ensure that the views of the policyholders can be directly represented to the GAA (see Section 3.3).



If you are a policyholder and have any questions, require any further information or wish to make any representation to the GAA you should contact: Equitable Life Assurance Society, Walton Street, Aylesbury, HP21 7QW.

2. Value for money assessment

The GAA has assessed the value for money delivered by Equitable Life to its workplace personal pension policyholders by looking at cost versus benefits. More detail about how we have done this is set out in Appendix 2.

Key highlights of our assessment

- As Equitable Life is a closed insurance society it has to balance surplus capital fairly between all policyholders during the period of run-off. Our discussions with Equitable Life made clear that this is at the centre of all strategic decisions.
- Equitable Life take great care in managing the distribution of reserves to achieve this aim of fairness between all policyholders. Ensuring a fair distribution both now and in the future is a foremost principle.
- The future leaving pattern of policyholders is hard to assess and best estimates have to be made for modelling and financial projections.
- Equitable also assess the balance between with-profits and unit-linked policyholders and has taken steps to make unit-linked charges to better reflect the underlying investment costs and to equalise charges between different series of policyholders.
- The fact Equitable Life is not selling new products allows it to offer slightly more open guidance and communication to policyholders because it can easily demonstrate its independence.
- The GAA found a strong culture of customer service, which is commendable considering the firm is not taking any new customers.
- Policyholders need to transfer from Equitable Life if they wish to receive benefits by way of income drawdown, although partial withdrawals can be taken from policies. It is understandable that the costs of establishing such drawdown facilities from within Equitable Life may not be the best use of resources.
- The closed book status in run-off has associated characteristics which may impact on policyholders in certain circumstances – for example a reduction in unit-linked fund values could lead to increased annual management charges. Equitable Life manage the issues of the run-off closely.
- The unit-linked contract terms require significant under-performance before the investment managers can be changed, although this does not prevent interaction and discussion of performance on an ongoing basis.
- Equitable Life has reviewed its fund range and removed a number of less widely used funds. There were very few policyholder queries which implies that the communication of the exercise was successful.
- The investment instructions given to the investment managers in relation to with-profit funds are tightly defined and monitored.

Overall the GAA's opinion on the value for money delivered is that the GPPs offer reasonable to good value for money.

3. GAA activity and regulatory matters

This section describes the work that the GAA has done over the year and also covers the other matters which we are required to include in our annual report.

3.1 GAA actions this year

We prepared and issued a request for data on all the relevant workplace pension policies on 12 May 2016.

On 29 June 2016, members of the GAA visited Equitable Life to meet our main contact and representatives from the investment and administration teams. We discussed how the investment funds are managed and governed. We visited the administration teams to see in detail how some of their work is carried out and how they deal with policyholders, as well as meeting managers to discuss service standards and how these are monitored and managed.

Equitable Life provided all the key information we requested.

The GAA held 7 meetings during 2016 to review and discuss the information we had received and to develop and improve the way that we assess value for money and report on this.

3.2 Independent Project Board (IPB)

The IPB issued a report into workplace pensions in December 2014 following a previous report from the Office of Fair Trading in 2013. The FCA required all pension providers who were subject to the IPB report to make proposals to governance committees (in this case the GAA) by 30 June 2015, and for the provider to agree a plan to address the risk of high charges of workplace pension savers in group pension arrangements. Equitable Life provided their proposals to the GAA in line with this timescale and proposals were agreed with the GAA for this purpose.

Equitable Life reviewed the pricing for unit-linked policies. This resulted in varying charges for different funds with effect from 1 April 2016. Charges range from 0.5%pa to 1.0%pa. This applies to all series of policies, ending any difference between different series.

The GPPP2000 with-profit charges were reduced with effect from 1 April 2016 to 1.0%pa from 1.4%pa to bring these into line with the GPPP series policyholders.

3.3 Concerns raised with the Provider by the GAA and their response

The GAA has not formally raised any concerns with Equitable Life during the year covered by this report.

In the first year, we challenged the lack of lifestyling facility for policyholders who wish to reduce risk in their investments in the run up to retirement, Equitable Life commented that this process is not necessarily applicable to with-profits policyholders, which we accepted. Equitable Life believe that, following the introduction of greater flexibilities for policyholders, many would opt to take their funds as cash and therefore lifestyling (into bonds or cash) was no longer appropriate for them.

The challenges we have made this year relate to the investment oversight and review processes. We have questioned and discussed the investment review process for unit-linked processes at length including the committee structure and the roles of committees in setting of benchmarks and investment review. We also questioned the investment managers terms of engagement. This interaction showed oversight is undertaken within certain restrictions in the terms of engagement.

3.4 The arrangements put in place for policyholders' representation

The following arrangements have been put in place to ensure that the views of policyholders can be directly represented to the GAA:

The role of the GAA and the opportunity for policyholders to make representations direct to the GAA has been communicated via the Equitable Life website and has been highlighted on annual benefit statements since April 2016.

Equitable Life will receive and filter all policyholder communications, to ensure that this channel is not being used for individual complaints and queries rather than more general representations which may be applicable to more than one policyholder or group of policyholders. Where Equitable Life determines that a communication from a policyholder is a representation to the GAA, it will be passed on in full and without editing or comment for the GAA to consider.

To date, no representations have been received via Equitable Life nor direct to the GAA.

4. Next Steps

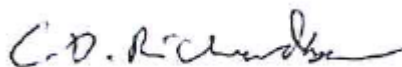
This GAA report is for the year to 5 April 2017. The process of annual reports under the FCA requirements is ongoing and further annual reports will be required.

In the next year the GAA will:

- Assess the level of transaction costs within the individual funds
- Give further consideration to the investment review process
- Continue to challenge Equitable Life to ensure that, within their own resource constraints, costs and charges for members are minimised and represent value for money

If you are a policyholder this report is for your information only and you do not have to take any action. If you do have any questions, require any further information or wish to make any representation to the GAA you should contact Equitable Life at the address shown below:

Equitable Life Assurance Society, Walton Street, Aylesbury, HP21 7QW.



Colin Richardson

Chair: PTL Governance Advisory Arrangement

Appendix 1

Summary of workplace personal pensions data at 31 December 2015

	GPPP 3.5% GIR With-profits fund available with 3.5%pa guaranteed investment return plus unit-linked	GPPP 0% GIR With-profits fund available with 0%pa guaranteed investment return plus unit-linked	GPPP2000 0% GIR With-profits fund available with 0%pa guaranteed investment return plus Unit-linked
Number of employers: non-qualifying for auto-enrolment	1,069	1,456	56
Number of employers: qualifying for auto-enrolment	0	0	0
Total number of policyholders	7,076	11,396	334
Contributing/Non-Contributing	75 / 7001	91 / 11,305	7 / 327
Total value of assets (market value)	£180m	£125m	£2m

Appendix 2

Value for money assessment

The GAA believes that value for money is necessarily highly subjective and will mean different things to different people over time, depending on what they consider important at that time. What is clear is that it is always a balance of cost versus benefits. There is not enough publicly available data to perfectly assess value for money in an absolute or relative way. We have, however, been able to carry out limited relative comparison of the costs and benefits of these workplace personal pension plans with similar products from similar providers.

The GAA has assessed the value for money delivered by Equitable Life to its workplace personal pension policyholders by looking at cost compared against our evaluation of the quality of the benefits.

We have looked at the benefits offered to policyholders in three main areas – investment, communications and administration – together with other features such as the range of options available at retirement. In making our overall assessment of the quality of the benefits and standards achieved, where possible we have taken into account the likely needs and expectations of this group of policyholders, based on the information available to us.

We have looked at the total ongoing cost of the policy by analysing all the charges, which may be applied in a number of different ways.

Finally, we have considered the quality of benefits offered versus the charges deducted, to reach an overall opinion on value for money. Where possible, we have formed our opinion taking into account the benefits and charges of other similar providers.

In each area of benefits, in the tables on the next few pages we have described the features in the left hand column, based on the information given to us. Our opinion on quality is given alongside in the right hand column.

Where we have used technical pensions terms or jargon, these are explained in the glossary at the back of this report.

Investment - Design and performance of investment strategies

The GPPs do not have a default investment fund or strategy, but a significant proportion of policyholders are invested in the with-profits fund, particularly in the group of policies where there is a guaranteed return of 3.5%pa.

There are no defaults, and there have always been a limited number of Lifestyle strategies and Equitable Life have determined that adding a Lifestyle option for unit linked policyholders is not a good use of policyholders' money. There has recently been a review and rationalisation of funds and policyholder interests and views have been considered, moving and changing funds where necessary. However, this process was not completely independent as the contracted investment manager was the key participant in that review.

Lifestyling was not available as an option until GPPP2000 series of policies which offered one lifestyling strategy based on switching to gilts and bonds over the 5 years prior to retirement. Fewer than 90 policies remain in force where this strategy was chosen and it is no longer available to other policyholders for accumulated or future contributions.

The with-profits funds are managed by an external fund manager, Blackrock. The guaranteed part of the with-profits funds matching the guaranteed liabilities concentrates on matching cashflows, with cash and liquid assets for the remaining monies. That equates to around £3.4 billion matched cash flows out of £4.4 billion. Cashflows over 7.5 years are matched with UK Government bonds with shorter term payments matched with corporate bonds.

The Asset Liability Committee define the guidelines for Blackrock and reviews the unit-linked investment fund range.

There are no formal default funds reflecting no requirement for or expectation of these at the time of policy commencements when Equitable Life was open to new business.

Most policyholders are invested in with-profits funds which are managed very well in significant detail, or in unit-linked funds with a broad sweep of asset classes.

The unit-linked funds are regularly reviewed through committee structures. The investment managers input directly into the Asset and Liability Committee and the Unit Pricing Committee which need to ensure they maintain the ability to scrutinise independently from the investment managers. We accept that the review process carries a risk of disproportionate cost for this number of policyholders.

For with-profits investment management, the liaison, instruction and review between Equitable's Asset and Liability Committee and Blackrock appears very tight and well developed in detail.

<p><i>Investment – Fund range available</i></p>	
<p>The unit-linked fund range gives policyholders a choice of 11 funds, covering single asset classes and some multi-asset managed funds. External fund managers, Aberdeen Asset Management, are responsible for managing the funds. The range has been reviewed in 2015 and significantly rationalised and simplified during 2016. Prior to review there had been over 100 funds (including some not available to workplace pension policyholders) which has now reduced to 11.</p> <p>Some policyholders are also eligible to invest in the with-profits fund.</p>	<p>We believe that a good range of funds is available for policyholders who wish to select funds, representing the major asset classes including a with-profits option. We believe the rationalisation and simplification was helpful to policyholders, and was implemented successfully.</p> <p>With-profits policyholders with policies written before 1 July 1996 benefit from a guaranteed investment return of 3.5%pa in the with-profits fund, which we believe represents a valuable benefit.</p> <p>The lifestyling strategy was only available to a very small number of policyholders although we note that it has not been reviewed to reflect that policyholders no longer need to buy an annuity.</p>
<p><i>Investment - How investment performance of the fund range is reviewed and any changes made</i></p>	
<p>The performance of the with-profits fund and unit-linked funds are regularly reviewed by the Asset and Liability Committee, the Executive Committee and Board of Equitable Life. The terms of reference include reviewing investment performance figures against agreed investment objectives.</p> <p>Most unit-linked policyholders use the managed fund. This is managed by Aberdeen Asset Management. The fund charges across the range of unit-linked funds vary from 0.5%pa to 1.0%pa.</p>	<p>Evidence has been provided that the characteristics and net performance of the investment strategies are regularly reviewed by the With-Profits and Asset and Liability Committees.</p>

<p>The main committees monitoring investments are the Asset and Liability Committee (Equitable Life internal only) which meets monthly; and the Joint investment Committee (Equitable Life and Aberdeen Asset Management) which meets bi-monthly. The agendas for these committees show a wide-ranging remit.</p> <p>For unit-linked funds there are triggers for further discussion and Equitable believe that having reviewed and overhauled the unit-linked funds recently there is a need for these to run for a period of time to allow for proper performance reviews. The unit-linked contract terms require significant under-performance before the investment managers can be changed, although this does not prevent interaction and discussion of performance on an ongoing basis. The terms mean the Equitable Life do not, until 2022, have unfettered freedom to change unit-linked investment managers.</p> <p>The Asset and Liability Committee’s Terms of Reference include investment oversight as follows:</p> <p>“The overall objective of the Committee is to deliver the Society’s stated strategy “Carefully managing solvency to enable capital distribution and only then seeking to maximise return”.</p>	<p>The rationalisation to 12 funds (including with-profits) is beneficial from both a governance viewpoint and to facilitate a manageable policyholder choice. The transition appears to have been undertaken smoothly.</p> <p>As with all features, further future development of investment options would have an associated cost which would have to be borne by the mutual’s with-profits policyholders and therefore incurring such costs is not necessarily in the policyholders’ best interests.</p> <p>The Committee structure to review unit-linked investment performance is substantial but the process has some limitations in the ability to make changes of investment manager if this became necessary. The rationalisation of the fund range was sensible and well-managed.</p> <p>The Asset and Liability Committee undertake their Terms of Reference comprehensively.</p>
<p><i>Communications and Support - Statement of aims and objectives of investment strategies</i></p>	
<p>The objectives of each unit-linked fund and the with profits fund are stated and published on Equitable Life’s website.</p>	<p>The description of fund objectives and how investment management is undertaken has been revised on the website, it should now</p>

	<p>be easier for policyholders to use the information in deciding whether to switch investment funds.</p>
<p><i>Communications and Support – Overall quality of written communications, including education on pension saving</i></p>	
<p>Sample policyholder communications have been provided including an annual benefit statement, pre-retirement wake up letter and the open market option provided at retirement.</p>	<p>In our opinion, policyholder communications are of a high standard overall.</p>
<p><i>Communications and Support - Other support, including telephone and online,</i></p>	
<p>General information is available on the website and policyholders can obtain details of their fund value and other support by telephone.</p> <p>Equitable Life uses policyholder focus groups to test reaction to some proposed changes. In 2014, this method was used to look at proposed changes to the annual benefit statements, which were introduced in 2015. There is evidence that policyholders appreciate the changes. In 2015, the focus groups were used to look at ways of improving communications with unit-linked policyholders.</p> <p>Although policyholders cannot log onto the website to see their fund value, they can obtain this information over the phone during weekday working hours.</p>	<p>In our opinion, policyholder communications are of a high standard overall and policyholders have access to good telephone support. The customer support team appears well managed.</p> <p>Our visit to Equitable Life on 28 June 2016 encompassed meeting the telephone support teams. This showed particular commitment to a high quality service for policyholders including resourcing and re-allocation of resourcing to deal with varying work demands, together with a high level of management monitoring.</p> <p>Some policyholders did request access to personal information online as part of the</p>

	<p>unit-linked policyholders focus group work, but at present Equitable Life feel that the cost of developing this cannot be justified and the GAA supports this view.</p>
<p><i>Communications and Support - When choosing retirement options</i></p>	
<p>Pre-retirement “wake-up” letters are issued 2 years before the selected retirement date. However, policyholders can alter their stated retirement date. A second “wake-up” letter is issued 6 to 7 months prior to their retirement date. A further push for policyholder responses is undertaken before retirement, with a 5 year rollover of the retirement date if there is no response. This has been reviewed by Equitable Life and will be changed to a 2 year rollover by April 2017.</p> <p>The “wake-up” pack is sent 4 months prior to retirement age.</p> <p>Policyholders are pointed towards the Money Advice Service and Pension Wise service.</p>	<p>The retirement pack is concise, factual and generally helpful for policyholders.</p> <p>The documents are of a reasonable quality, and good support is offered via telephone support.</p> <p>It is understandable that investment in detailed projection and financial management internet tools by Equitable Life for policyholders may not be the best use of limited resources and have not been made available.</p>
<p><i>Risk Management – operational and financial</i></p>	
<p>The internal audit function includes input external to Equitable Life. With the exception of external audit review of internal controls over financial reporting, there is no separate assurance audit accreditation for internal processes.</p> <p>There is a regular process of internal product review to ensure that products remain fit for purpose and suitable for policyholders.</p>	<p>Given the group’s history and the centrality of fairness in its decision making and external scrutiny by policyholders, risk management is a key strength of Equitable Life today.</p> <p>The financial strength of Equitable Life is constantly considered as a central element of</p>

<p>A detailed internal audit of risk management was undertaken in early 2016. This included:</p> <ul style="list-style-type: none"> • Extent to which risk management arrangements support the achievement of strategic objectives • Performance of risk oversight committee duties for a range of committees • Strength of risk management within the Society's culture <p>The Asset and Liability Committee was specifically included within this review.</p> <p>The review concluded that the Risk Management Framework is generally functioning effectively and is embedded within the Society's Policies and processes. Also, that governance committees are adequately considering the Society's risk with risk actions being tracked through committees and frequently challenged and debated in committee meetings.</p>	<p>all decisions. While it does not have the depth of a large growing assurer, its position means that its financial position is carefully managed and issues of policyholder fairness are embedded in its structure – because some decisions which benefit some policyholders may be at the expense of other policyholders. As a result its resources are carefully managed.</p>
<p><i>Administration service and core financial transactions</i></p>	
<p>Administration is carried out in house and evidence has been provided of performance against service standards of 5 and 10 working days.</p> <p>If the agreed Service Standards are met, core financial transactions will be processed promptly and accurately.</p> <p>Equitable Life has provided details of complaints to us plus the outcome of the complaints. For the last 12 to 18 months these have run at the level of around 10 per annum of varying nature which is very low in relation to the number of policyholders.</p> <p>We visited the administration team on June 28th 2016 and discussed service levels, resourcing and processes with administration staff.</p>	<p>We believe the administration service provided to policyholders is of a good standard and that core financial transactions are processed promptly and accurately.</p> <p>Complaints are rare reflecting good service standards and are dealt with appropriately.</p> <p>The administration team we met showed that high standards of administration are maintained with strong management from administration team leaders.</p>

<p><i>Other governance or support arrangements</i></p>	
<p>Additional governance structures for the benefit of policyholders that are specific to Equitable Life include the with-profits committees for policyholders invested in the with-profits fund, as well as the considerable external scrutiny of some aspect of the running of Equitable Life by Parliament amongst others.</p> <p>There are very clear communications with with-profit policyholders regarding capital distributions when circumstances require. This is not straightforward to manage but clear points are made within the communications.</p>	<p>There are no additional benefits to policyholders by virtue of their membership, and we note that this is unlikely to be appropriate bearing in mind that the Society's only source of funds is now the with-profits fund.</p> <p>With-profits policyholders will benefit from the additional governance provided by the with-profits committee. We have also noted positively the considerable external scrutiny of Equitable Life and the regular reviews of charges for expenses and guarantees.</p>
<p><i>Retirement options</i></p>	
<p>At retirement, policyholders can take their whole benefits as cash or withdraw a series of Uncrystallised Funds Pension Lump Sums (UFPLS). If policyholders want to select income drawdown they need to transfer out of Equitable Life. Partial UFPLSs are allowed subject to a minimum residual fund value of £2,500. A minimum £5,000 partial UFPLS amount applies.</p> <p>Alternatively, as well as the open market annuity option, they can choose to transfer to another provider for flexi-access drawdown or take advantage of the preferential annuity terms under an agreement with Canada Life.</p>	<p>The range of choice at retirement is reasonable for policyholders without encompassing all flexible options. Although a transfer to another provider is required for flexi-access drawdown, no penalty or charge is applied on retirement at or after age 55 (or age 60 for protected rights benefits) and any guaranteed benefits are paid out in full.</p>

<i>Charges and direct and indirect costs borne by policyholders</i>	
<p>The Annual Management Charge (AMC) is 1.0%pa for with-profits. An additional annual charge of 0.5% is made for the with-profits fund to cover the costs of the guarantees. A reduced allocation rate of 95.5% applies in the very small number of cases where new contributions are being paid.</p> <p>The with-profits charge is subject to regular formal review comparing charges against expenses in the past and projected in the future run-off, taking into account changes to unit-linked charges.</p> <p>Following the recapture of the unit-linked business from Lloyds Banking Group in 2015, Equitable Life decided to review the pricing for unit-linked policies, because these were being subsidised by with-profits policyholders. This resulted in varying charges for different funds with effect from 1 April 2016. Charges range from 0.5%pa to 1.0%pa. This applies to all series of policies. A bid/offer spread of 4.5% applies to the small number of cases where unit-linked premiums are being paid, apart from the GPPP2000 contracts where no such bid/offer spread exists.</p>	<p>The AMC for with-profits of 1.0% (plus 0.5%pa for the cost of guarantees) represents a level of charge that is around average amongst providers who were part of the IPB review, based on the GAA's experience.</p> <p>The appropriate charge is considered carefully by the Equitable Board.</p> <p>Equitable Life have now reviewed charges for unit-linked funds to ensure fairness between all policyholders and the new charges were introduced from 1 April 2016.</p>
<p>Transaction costs</p> <p>Transaction costs for the with-profits fund are effectively absorbed by Equitable Life. With-profits investments share in the profits and losses of the Society and the investment return passed on to policy values is a smoothed return at the discretion of the Society.</p> <p>Unit-linked investments are held in externally managed Open Ended Investment Company funds (OIECs). Equitable Life meets in full the Ongoing Charges Figures for each fund, with the exception of the Property Fund where those costs related to managing the property investments are borne</p>	<p>Limited information was provided on transaction costs, due to the difficulties of analysing dilution charges. The GAA will look in more details at the transaction costs in future reports when the FCA has completed its consultation on a common methodology for transaction cost calculations. This is</p>

<p>additionally by the policyholders. This is known as the Property Expense Ratio. The Property Expense Ratio at December 2015 was 0.45%pa.</p> <p>Policyholders may also bear dilution adjustments, which relate to dealing expenses, commissions and stamp duties and taxes. Further dilution adjustments can be applied to the pricing of the OEICs depending on whether the fund is expanding or contracting. No information has been provided about the level of dilution adjustments, which will form part of the transaction costs borne by policyholders.</p>	<p>expected later in 2017.</p>
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Overall assessment of value for money

In our opinion the GPPs represent reasonable to good value for money, taking into account the benefits offered to policyholders.

Appendix 3

Background and credentials of the PTL Governance Advisory Arrangement

In February 2015 the Financial Conduct Authority (FCA) set out new rules for Providers operating workplace personal pension plans (called relevant schemes) to take effect from 6 April 2015. From that date, Providers had to have set up an Independent Governance Committee or appointed a Governance Advisory Arrangement whose principal functions would be to:

- Act solely in the interests of the relevant policyholders of those pension plans and to
- Assess the “value for money” delivered by the pension plans to those relevant policyholders.

The FCA rules also require that the Chair of each Independent Governance Committee and Governance Advisory Arrangement produce an annual report setting out a number of prescribed matters.

The PTL Governance Advisory Arrangement was established on 6 April 2015 and has been appointed by a number of workplace personal pension Providers. PTL is a specialist provider of independent governance services primarily to UK pension arrangements. Amongst other appointments we act as an independent trustee on several hundred trust based pension schemes and we sit on a number of IGCs. We have oversight or responsibility for in excess of £120bn of pension assets. More information on PTL can be found at www.ptluk.com.

All of PTL’s Client Directors have been appointed to the GAA. More information on each of them, their experience and qualifications can be found at <http://ptluk.com/team/>.

Dean Wetton is also a member of the GAA. Dean is independent of PTL. Information on his experience and qualifications can be found at <http://www.deanwettonadvisory.com/consultants/index.html>.

PTL, its Client Directors and Dean Wetton are independent of all of the Providers participating in the GAA in so far as:

- They are not directors, managers, partners or employees of any of the Providers, or any company within their groups, or paid by them for any role other than as members of the GAA, nor are they members of the share option or performance related pay schemes of any of the Providers nor have they been within the last five years.
- They do not have a material business relationship of any description with any of the Providers, or any company within their groups, and have not done so within the last three years.

Any potential conflicts of interest are recorded in a log and considered by the GAA in accordance with its conflict of interest policy.

The members of the GAA are appointed by the board of PTL. The board is satisfied that individually and collectively the members of the GAA have sufficient expertise, experience and independence to act in the interests of the members of the Providers’ pension plans.

The terms of reference agreed with Equitable Life can be found at:

www.equitable.co.uk/media/49927/gaa-tor-side-letter.pdf

Glossary

“Active management” means the investment of funds where the skill of the fund manager is used to select particular assets at particular times, with the aim of achieving higher than average growth for the assets in question

“Allocation rate” means the proportion of the investment that is invested. Any deduction is typically to cover set up costs. Where the allocation rate is more than 100%, this is typically to reduce the effect of other charges or costs.

“Annual Management Charge” or “AMC” means a deduction made by the pension provider or investment manager from invested assets, normally as a percentage of the assets. The AMC is generally how the pension provider or investment manager is paid for their services.

“Annuity” means a series of payments, which may be subject to increases, made at stated intervals, usually for life. If the annuity is “joint life”, it will continue to a spouse (usually at a lower rate) after the death of the original person receiving the payments (“the annuitant”).

“Capital units” are a way of charging for the cost of setting up a pension policy over the lifetime of the policy. Some or all of the contributions in the early years are used to buy a different type of unit in the chosen investment fund, and these units are gradually sold or cancelled each year. The money from cancelling the units is taken by the provider to meet the cost of setting up the policy.

“Core financial transactions” means the essential processes of putting money into a pension policy or taking it out, namely:

- *Investment of contributions*
- *Implementation of re-direction of future contributions to a different fund*
- *Investment switches for existing funds, including lifestyling processes*
- *Settlement of benefits – whether arising from transfer out, death or retirement*

“Decumulation” means the process of using policyholder’s fund to provide retirement income. This could involve purchasing an annuity to provide an income for life or leaving the fund invested and taking it out as one or more lump sums.

“Default investment strategy” means the investment funds into which contributions are invested for policyholders who do not select other specific investment funds from the full range of funds available.

“Lifestyling” means an automated process of switching investment strategy as a policyholder approaches retirement, in a way that is designed to reduce the risk of a policyholder’s retirement income falling.

“Transaction costs” means a combination of explicit and implicit costs included within the price at which a transaction (i.e. buying or selling an asset) takes place.

“With Profits” means an insurance contract that participates in the profits of an insurance company. The insurance company aims to distribute part of its profits to with-profits policyholders in the form of bonuses.