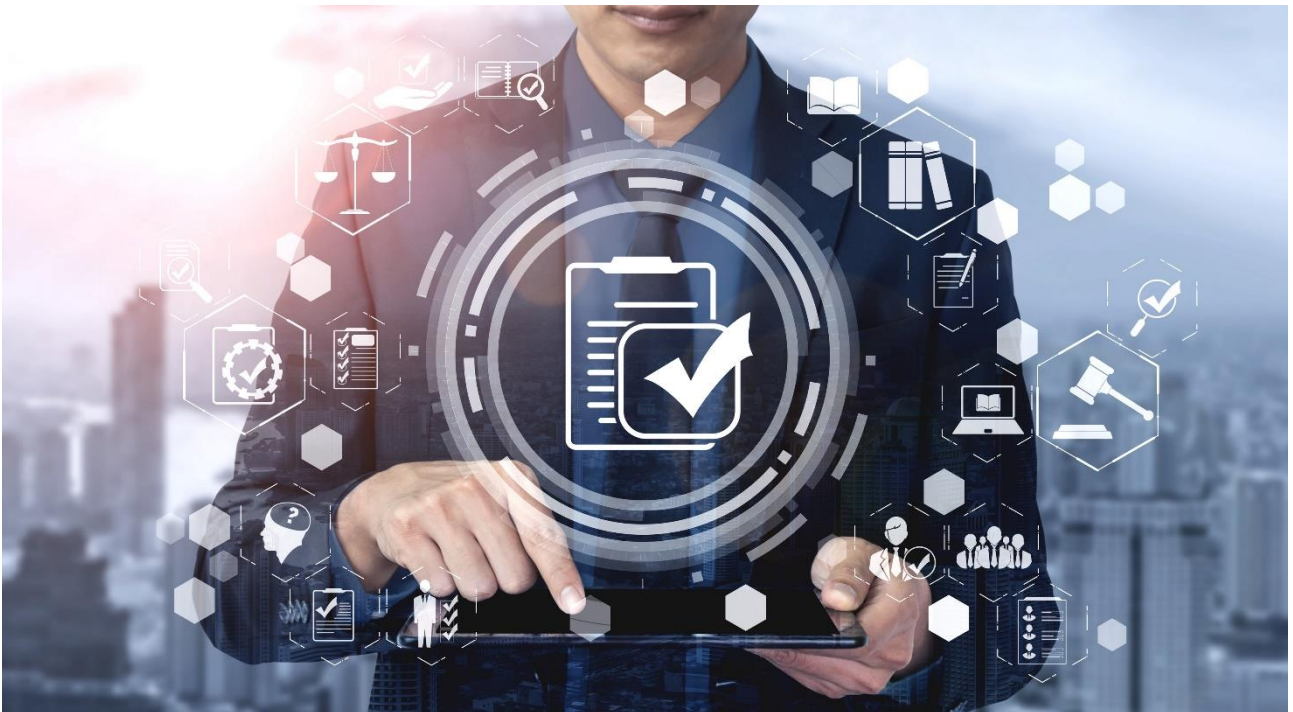


GOVERNANCE FRAMEWORK POLICY



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Pension Authority No: PB67866

Revenue Approval No: SF7346

PENSION TRUSTEES: Mr. John McHugo, (Chairman);
Ms. Pauline Brennan; Mr. Francis Coughlan; Ms. Deirdre Herlihy
and Mr. James Skehan (Professional Trustee).

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INTRODUCTION:

It is recognised that the Trustees' role is an onerous and pro-active one and the objective is to ensure that the financial interest of the members are looked after at all stages of their pension journey and that the Pension Scheme runs in an efficient and compliant manner.

This Governance Policy was originally prepared to adopt the Codes of Governance published by the Pensions Authority and, while the Codes were not legally binding, the Trustees decided to adopt the Codes as best practice for operating the National Federation of Voluntary Service Providers (NFVSP) Pension & Life Assurance Scheme (Scheme) and in discharging their duties as Trustees.

The policy has been updated during 2021 and in January 2022 to take account of the regulations introduced by IORPII, the Code of Practice published by the Pensions Authority in November 2021 and the change in Registered Administrator from January 2022.

For some issues a separate more detailed document has been prepared.

Going forward the policy will be updated as required but no later than February 2027.

WHO'S WHO:

Trustees:

John McHugo (Chairman)
Pauline Brennan
Francis Coughlan
Deirdre Herlihy
James Skehan (Professional Trustee)



Pension Scheme Manager / Scheme Secretary:

Maria McMahan

Key Function Holders:

Risk Management:

Mr. Frankie Cronin, Grant Thornton, 13-18 City Quay, Dublin 2.

Internal Audit:

Mr. Tom Gilligan, Align Advisory Limited, The Charlemont Exchange



Registered Administrator:

Irish Life



Investment Managers:

Irish Life Investment Managers



Life Assurance Scheme:

Brokers and Administrators: Cornmarket

Underwriters: Aviva



External Auditor

Mazars



GOVERNANCE PLAN OF ACTION:

The Trustees have implemented a set of procedures to ensure that the Pension Scheme operates in an efficient and compliant manner and to achieve this they have implemented the following procedures:

Governance & Compliance Calendar:

At the final Trustees meeting each year, the Trustees agree on the principal objectives for the following year and the actions that need to be taken in a timely fashion to ensure that the Scheme remains compliant. This is then documented in a Governance & Compliance Calendar, to be approved by the Trustees at the first meeting of the year and which is then monitored by the Trustees throughout the year.

1. Pension Benefit Statements to be issued to active and deferred members at their home address, (where known) no later than May of each year. If the member's home address is not known, their pension statement will be held by Irish Life until they are traced and their record updated.
2. The Trustee Annual Report is audited and signed off by the Trustees no later than 31st August each year.
 - a. The Pension Scheme Manager will arrange for a copy of the Trustee Annual Report to be issued to each recognised Trade Unions by no later than the 30th September each year.
 - b. The Pension Scheme Manager will follow up with each participating employer to ensure that members have been notified of the availability of the Trustee Annual Report by no later than 30th September.
 - c. The cover letter that is issued with the Pension Benefit Statements will also advise members that the Trustee Annual Report will be available in September each year on the National Federation's website www.fedvol.ie (click on pensions tab).
3. The performance of the Registered Administrator will be monitored on a quarterly basis and reviewed on an annual basis. The Registered Administrator is required to report to the Trustees re their adherence to SLA timelines at each regular Trustee meeting.
4. Compliance with regulatory deadlines (including tasks delegated to Irish Life by the Trustees i.e., new entrant packs, leaving service options, payment and receipt of transfer values and investment of contributions) will also be monitored.
5. Annual confirmation will be obtained from Irish Life that:
 - a. Member's Pension Benefit Statements have been issued to home addresses (May).
 - b. Pension Authority fees have been paid on behalf of the Trustees (April).
 - c. Statistical returns as required have been submitted to the Pensions Authority (October).
 - d. Documentation changes – if any have been recorded and notified to the relevant regulatory bodies (March).
 - e. The appropriate tax has been deducted for all claim payments (March).
 - f. AML checks have been carried out on behalf of the Trustees (Feb).

6. Remittance of contributions are monitored on a monthly basis by Irish Life and the Pension Scheme Manager (see Financial Controls Section).
7. The Scheme's External Auditor will carry out an audit of the Trustee Annual Report (TAR) and Financial Statements.
8. The Trustees will monitor the performance of the selected investment funds on a quarterly basis and review the performance against agreed benchmarks on an annual basis.
9. Each Trustee will declare any conflict of interest at each Trustee meeting and any conflict will be noted in the Conflict of Interests Register.
10. The Trustees will review and update the Risk Register as required and a full review of the risk register will be undertaken on an annual basis.
11. The Trustees will prepare and submit, when required, an Annual Compliance Statement to the Pensions Authority by the 31st January each year, for the previous scheme year.
12. The Trustees will obtain regular reports, at least quarterly, from both the Internal Auditor and Risk Management Key Function Holders.
13. The Trustees will arrange liability insurance on an annual basis (February).
14. Annual confirmation will be obtained from the Professional Trustee that he continues to hold either the PTP or QPT designation and of the number of CPD hours completed in the previous calendar year (January).
15. Each Trustee will complete the "proper requirement" questionnaire annually.
16. The Key Function Holders (KFH) will complete the "proper requirement" questionnaire every three years. An annual declaration will also be sought from the KFHs to ensure there is no material developments in relation to their compliance with the fit and proper requirements that the Trustees should be made aware of.

Governance Policies:

The Trustees have prepared a number of written policies to document the procedures to be followed in certain areas including:

- a) Accounting Procedures
- b) Administration Policy
- c) Business Continuity Plan
- d) Conflicts of Interest
- e) Remuneration & Other Charges

- f) Member Engagement
- g) Employer Engagement
- h) Fitness & Probity and Trustee Training Policy
- i) Internal Audit Policy
- j) Internal Financial Controls
- k) Internal Dispute Resolution Procedures Policy
- l) Outsourcing Policy
- m) Risk Management Policy
- n) Selection, appointment and ongoing monitoring of Key Function Holders (KFHs)
- o) Statement of Investment Governance
- p) Statement of Investment Policy Principles
- q) Wind Up Policy

Periodic Reviews / Tasks:

A number of formal reviews need to be undertaken over different time periods as follows:

- A critical review of the Registered Administrator and the Investment Manager will be undertaken every three years, with the first review taking place in 2024, for a decision to be taken with an effective date of 1/1/25. If the outcome of either review is a cause for concern, then the Trustees will consider the need to commence a formal tender process or in any event a full market review / RFP will be undertaken every five years. This review will follow the formal EU tender process as required based on the size of the Scheme's assets.
- The group life unit rate will be reviewed every 3-4 years, the next review is due in February 2028.
- All Trustees are required to complete Trustee training within 6 months of their appointment and every 2 years thereafter to comply with Pensions Authority Regulations. The Trustees have agreed that refresher training will take place every year from 2022.
- The Trustees will ensure that a valid Statement of Investment Policy Principles (SIPP) is in force and that this is reviewed every 3 years, or more frequently if there is a fundamental change to the investment strategy or the funds that are made available to members. The Statement was last updated in April 2022 following the transfer of the Scheme to Irish Life.
- An Own Risk Assessment (ORA) will be completed no later than 22/4/2024. The ORA will be reviewed every three years thereafter, or more frequently if there is a material change in the risk profile of the Scheme.
- A list of all Trustees' policies, together with their implementation and review dates is outlined in the Trustees' Governance & Compliance Calendar.

TRUSTEES:

The National Federation's Pension & Life Assurance Scheme is overseen by 5 individual Trustees.

The objective is to increase the membership of the Trustee Board and to appoint individuals who are fit and proper, ideally from a number of different participating employers and with a range of different skills mix and experience including finance, management, HR and compliance.

The Trustees recognised the need for a Professional Trustee to be added to the "Board" and after initially appointing General Investment Trust, subsequently replaced them with James Skehan in January 2020 to achieve a more independent position.

The Trustees collectively have the necessary expertise, knowledge and experience to meet their responsibilities and to ensure that the members interests are looked after.

Current Trustees (2024):

John McHugo (Chairperson)

- Director of Finance, Ability West
- Appointed as Trustee on 26/7/2016
- Qualifications - Professional Accountant with over 40 years' experience in both a practice setting and in the Not-for-Profit sector
- Over 30 years as a Trustees of a Defined Benefit pension Scheme



Francis Coughlan

- CEO, SOS Kilkenny
- Appointed as Trustee on 7/7/2017
- Qualifications - Bachelor of Business Studies; Diploma in Management and Industrial Relations and is a Registered Nurse (Intellectual Disability).
- Prior to commencing his post as CEO with SOS Kilkenny Clg in 2003, Francis was employed as a staff nurse in a variety of different settings and was also CEO at St. Aidan's Services in Gorey, Co. Wexford



Deirdre Herlihy

- HR Manager, Kerry Parents & Friends Association
- Appointed as Trustee on 10/9/2018
- Qualifications - BA Human Resource Management (Honours 2.1); IBEC – HETAC Level 7; Diploma in Employment Law – Merit Grade 1; Mediation – FETAC Level 6
- An experienced Human Resource Professional with over 18 years' experience (Industry -4 Years; Private Healthcare - 10 Years and Intellectual Disability Services - 4 Years)



Pauline Brennan

- Inspector, Workplace Relations Commission
- Appointed as Trustee on 1/8/2019
- Qualifications - MBs Human Resource Management
- Employment history is almost exclusively in the learning disability sector, other than a short period in media
- An experienced HR Practitioner in all areas relating to HR Management, including recruitment and retention, industrial relations and employee engagement
- Member of the Board of Management of a Special School and is an external examiner for GMIT, Castlebar Campus



James Skehan

- Independent Professional Trustee
- Appointed 27/1/2020
- Experience
 - Over 45 years' experience in the group pensions industry
 - Head of Pensions in New Ireland for 20 years
 - CEO of General Investment Trust, one of Ireland's largest corporate trustees for over 10 years
- Anti-Money Laundering
 - Authorised by the Dept of Justice & Equality – current approval applies until November 2026
- Professional Qualifications
 - FIIPM, QPT, PTP
- CPD hours completed
 - 34 hours in 2022
 - 52 hours in 2023



Fit and Proper Requirements:

The “Fit” requirement is met by the appointed Professional Trustee who has two of the three professional qualifications prescribed by the Pensions Authority i.e., QPT and PTP (one required).

The current Trustees (April 2024) have the following Trustee experience

Trustee	No of Years Appointed as a Trustee of the NRVSP Scheme	Overall Trustee Experience
John McHugo	7	32
Pauline Brennan	4	4
Francis Coughlan	6	6
Deirdre Herlihy	5	5
James Skehan	4	14

Trustee Training:

The Trustees completed Trustee training in December 2022 and in view of the increasing governance and regulatory requirements it was agreed that training would be undertaken on an annual basis. This training is delivered by the Scheme's Professional Trustee and is based on the specifics of the NRVSP Pension & Life

Assurance Scheme. The Professional Trustee will complete a registered external Trustee Training Course every two years.

To ensure that the Trustee Board maintains an appropriate mix of skills and knowledge, the Professional Trustee, participates in pension seminars on a regular basis.

The Trustees receive regular industry updates from the appointed Registered Administrator as part of the quarterly reporting and obtain various industry updates from different sources.

Secretary to the Trustees:

Maria McMahon has been appointed as Secretary to the Trustees. In this role, she will draft agenda for Chairman's approval and circulate to all Trustees prior to each meeting. The Secretary will also take notes and prepare minutes of meetings and circulate them and supporting documentation to the Trustees.

Maria McMahon

- Pension Scheme Manager and Secretary to the Trustees.
- Qualifications – Certificate in DC Pension Scheme Trusteeship (Pension Trustee Practitioner PTP); Diploma in Business Studies (Accountancy); IPASS – Certified Payroll Technician; European Computer Driving Licence (ECDL); Participates in all Trustees Training in respect of the National Federation's Pension & Life Assurance Scheme.
- Experience:
 - 30 years' experience in office administration
 - PA to CEO, HSE West - 4 years
 - PA to CEO, National Federation of Voluntary Service Providers - 20 years
 - Part-time Pension Administrator to National Federation's Pension Scheme – 15 years
 - Appointed full time Pension Scheme Manager to National Federation's Pension & Life Assurance Scheme in 2019



Trustee Meetings:

- The Trustees meet formally on a regular basis – subject to a minimum of one meeting per quarter. At the last meeting of the Trustees each year, they agree a Schedule of Dates for Trustees meeting for the following year.
- Each Trustee strives to ensure attendance at all meetings. It is noted that Trustees can participate by either physical attendance or remotely by Teams or conference call where all participants dial in.
- A formal notice of the forthcoming Trustee meeting, together with a copy of the minutes of the previous meeting, will be issued one week prior to each meeting.
- A Chairperson, once elected, can remain in position for a period of three years. The term can be renewed for two further terms (overall maximum of three terms / 9 years).
- The minimum number of Trustees will be three and three Trustees will form a quorum. In the absence of a quorum, the trustee meeting will be rescheduled.

- As required other parties – KFJs, the Registered Administrator, investment managers and other third parties will be invited to attend trustee meetings.
- Whilst ideally, all decisions made by the Trustees will be unanimous, a majority decision will prevail.
- In the case of a split decision, the Chairperson will have a casting vote.
- Decisions taken at Trustees meetings will be recorded in the minutes.
- The Secretary to the Trustees will take notes, prepare agendas and minutes and circulate to the Trustees.
- The agenda for each meeting shall include the following standing agenda items:
 - Declaration of any Conflicts of Interest
 - Risk Register
 - Governance & Compliance Calendar
 - Administrative matters
 - Member queries and complaints
- The minutes of each meeting shall record:
 - The date, time and place of each meeting
 - The names of the Trustees who did/did not attend the meeting
 - A note of other attendees
 - A summary of the discussions held and decisions made
 - Action points, deadlines and the name of the person responsible for progressing each item
- The Secretary will circulate minutes from each Trustee meeting within three weeks of the meeting.
- Trustees will clarify if any conflict of interest has arisen since the previous meeting and also if they are conflicted by any item to be discussed at the meeting.
- The Trustees will also participate in Team calls as required during the year to discuss issues requiring immediate attention between regular Trustee meetings.

MANAGING CONFLICTS OF INTEREST:

The Trustees are aware that one of the most important fundamental duties is to act in the best interest of the Scheme beneficiaries. In meeting this requirement, it is understood that the Trustees should avoid circumstances where they have other interests or duties that conflict with the interest of the beneficiaries.

To identify, monitor and manage possible conflicts, the Trustees have implemented the following measures:

- A Conflicts of Interest Policy and Procedures manual has been written.
- A register of Trustees interests which could give rise to a conflict has been established.
- At each meeting, Trustees will advise if any conflict has arisen since the last meeting.
- The register is then updated by the Pension Scheme Manager.
- On an annual basis each Trustee will be circulated with a copy of the conflicts recorded for that year and the Trustees will be requested to confirm in writing that the Register of Interest is correct and up to date.
- Where a conflict is identified, the Trustees will consider the issue in full and decide how it should be dealt with.
- In arriving at a decision, a number of issues may be considered including:
 - Is legal advice required;
 - Should the conflicted individual leave the meeting or is it sufficient for the conflict to be declared and recorded in the Conflicts of Interest Register;
 - Should the affected Trustee withdraw from voting on the issue;
 - Is the issue of such seriousness that the effective Trustee may need to resign.
- In arriving at a conclusion, practical issues will be taken into account, including the need for there to be a quorum, for a balance of expertise amongst the Trustees to be present.
- The discussion and decision in relation to any conflict that arises will be fully minuted.
- The Trustees will review the Conflicts of Interest Policy on a regular basis but at a minimum of every three years.
- The Conflicts of Interest Register also records any conflicts declared by the Key Function Holders.

FINANCIAL CONTROLS:

The National Federation's Pension & Life Assurance Scheme is significant in terms of:

- (a) Funds under management.
- (b) The ongoing contributions paid into both the Pension Scheme with Irish Life, and the Life Assurance Scheme with Cornmarket / Aviva.
- (c) The claim payments from the Scheme on withdrawal, retirement and death.
- (d) The monies held in the Trustees' Bank Account.

The Trustees have put controls in place to safeguard the movement and holding of all monies in connection with the Scheme and these are detailed in a separate Internal Financial Controls Policy.

Internal Audit Function:

The Trustees have appointed Tom Gilligan, Align Advisory as the Scheme's Internal Audit Key Function Holder effective from May 2022.

In making the appointment, the Trustees ensured that Tom Gilligan was different to the person appointed to the Risk Management Function.

- (a) Was of good repute and integrity.
- (b) Had the necessary experience and knowledge to carry out their functions.
- (c) Held an appropriate professional qualification.

See separate KFH Policy for more detail in relation to the selection, appointment and ongoing monitoring of Key Function Holders (KFHs).

Pension & Life Assurance Contributions:

Under the Rules of the Scheme membership of the Scheme is compulsory for employees:

- Aged at least 18 and under 65 years of age.
- Whose employment started after the date their organisation joined the Scheme.
- Whose eligibility is determined by their Employer and Employment Legislation e.g., the Protection of Employees (Part-Time Work) Act 2001 and the Protection of Employees (Fixed-Term Work) Act 2003.

The participating employer will start deducting personal contributions of 5% of salary (and any Additional Voluntary Contributions) and pay these together with the corresponding employer contributions directly to Irish Life and Cornmarket on a monthly basis.

Pension Contributions:

The pension contribution payment to Irish Life amounts to 11.35% of salaries (+ any AVCs). It is recognised that employee contributions 5% (and any AVCs), and the corresponding employer pension contributions

(6.35%) must be remitted to Irish Life within 21 days of the end of the month that the employee contributions (and AVCs) were deducted.

To ensure these payments are made on time the Trustees have established robust procedures with Irish Life to monitor the timely remittance of contributions.

The scheduled date for contributions to be remitted to Irish Life is the 10th of the month following the month that contributions were deducted from salaries / wages.

It has been agreed with Irish Life that monthly status reports will be sent to the Pension Scheme Manager on the 12th and 18th each month to ensure that all payments and breakdown schedules have been received from all participating employers.

This will ensure that the Trustees are kept fully informed regarding any contributions that may be in danger of missing the 21-day deadline and enable the Pension Scheme Manager to engage directly with employers where contributions are outstanding.

Cornmarket:

A total of 0.65% of salary is paid over directly to Cornmarket every month by each participating employer. On receipt of these payments, Cornmarket will:

- Pay the life assurance premium of 0.43% to Aviva.
- Pay the administration fee of 0.22% to the Trustee bank account via EFT.

A breakdown of monies received by Cornmarket each month from each employer is forwarded to the Pension Scheme Manager as part of the notification that the 0.22% has been paid to the Trustees' Bank Account.

Trustee Bank Account:

The Trustees operate a bank account to:

- (a)** Facilitate the payment of fees to third parties including the Professional Trustee, KFHS, External Auditor, Advisors etc.
- (b)** Process death claim payments.
- (c)** Establish and maintain a reserve / contingency fund.

The Trustees have produced a separate Internal Financial Controls Policy which outlines the controls in place in respect of withdrawal of funds from the account and set limits in terms of the number of signatories required for cheque signing / EFT payments.

Bank Account Reconciliation:

At each regular Trustees meeting the Pension Scheme Manager presents and outlines a summary of activity on the Trustee Bank Account, including banks statements and reconciliations, since the previous regular Trustee meeting.

Trustee Reserve:

The balance of the Trustees bank account is reviewed on an annual basis. When the balance in the Trustee bank account exceeds the agreed reserve figure (0.5% of the fund value), arrangements are made to pay a one-off lump sum into the pension fund on behalf of the members. The Trustee Reserve will be reviewed when the DAC has been established and takes over the trusteeship of the Scheme and the level of capitalisation / reserve required is established.

Claim Payments:

The Trustees have delegated the processing and payment of pension claim payments (refunds of contribution, transfers out and retirement benefits) to Irish Life. The Professional Trustee approves retirement and leaving service benefits (transfers out) before benefits are paid out.

Death claims for active members are processed through the Trustee Bank Account. The Pension Scheme Manager calculates the lump sum payable, which is then checked by the Professional Trustee to ensure that the benefits are within revenue limits.

If there is an excess, this can be used to purchase an annuity for a financial dependant of the deceased, with the life office that offers the most competitive annuity at the time (sourced via a Financial Broker) or following the passing of the Finance Act 2021 invested in an ARF.

Payment of death claims for deferred members is delegated to the Registered Administrator, who pays the deceased member's pension fund over to their Estate, in line with pension regulations.

ANTI-MONEY LAUNDERING (AML):

Although Trust based pension schemes are deemed to be low risk regarding the risk of money laundering, the Trustees recognise that it is necessary to implement and operate AML procedures in relation to:

- (a) The inclusion of new members.
- (b) The inclusion of new employers.
- (c) The payment of claims.

Irish Life:

Irish Life administer the NFVSP Pension Scheme and carry out AML screening on behalf of the Trustees. This includes robust AML / CFT checks on all members before benefit payments are made and the collection of appropriate Customer Due Diligence (CDD) documentation and screening where applicable.

Additional attention is paid to any single premium payments.

Employers and members are subject to ongoing:

- ✓ Politically Exposed Person (PEP) Screening
- ✓ Sanctions Screening
- ✓ Blacklist Screening

The Trustees obtain an AML status report from Irish Life on an annual basis and will be advised prior to same if there is an issue.

Professional Trustee:

James Skehan was appointed as a Trustee in January 2021. He acts as the Professional Trustee for the Scheme and has been authorised by the Department of Justice & Equality in relation to Anti Money Laundering. This authorisation runs for a three-year period. The authorisation reference is TCSP APP/1273/2020. Next renewal is due in October 2026.

James also has the QPT and PTP designation, which are the two of the three qualifications approved by the Pensions Authority to meet the Fit requirements under the Codes of Practice for Trustees. Confirmation that the required CPD hours have been completed are obtained on an annual basis from the Professional Trustee.

Death in Service Claims:

Death in Service benefit payments are processed by the Trustees who carry out AML checks before any benefit is paid. The lump sum benefit is paid out at the Trustees' discretion and the Trustees will carry out a full review of the possible recipients before deciding on the person(s) to whom the benefit is to be paid. The Trustees will ensure that proof of ID (passport / driver's licence) and address (bank statement / utility bill) is obtained prior to the payment of any benefit.

INVESTMENT:

The Trustees recognise that investment performance is a key element of the Pension Scheme and as the Scheme operates on a Defined Contribution basis, a choice of investment funds is offered to Scheme members, as well as a default fund for members who do not want to make a choice.

Choice of Funds:

The current choice of funds (2024) is as follows:

Fund/Strategy Name	Annual Management Charge (AMC) percentage per annum	Total Expense Ratio (TER) percentage per annum
EMPOWER Personal Lifestyle Strategy	0.29%	0.31%
Sustainable Equity (ESG) Fund	0.23%	0.25%
EMPOWER High Growth Fund	0.29%	0.31%
EMPOWER Moderate Growth Fund	0.29%	0.31%
EMPOWER Cautious Growth Fund	0.29%	0.31%
EMPOWER Stability Fund	0.29%	0.31%
EMPOWER Cash Fund	0.15%	0.15%

The funds are managed by Irish Life Investment Managers.

Default Investment Strategy:

The Trustees recognise that whilst investment choice is made available to members, the majority of members will not make an investment decision themselves and as a result, with effect from the 1st January 2022, the Trustees have selected the EMPOWER Personal Lifestyle Strategy (PLS) as the default investment strategy for the Scheme.

EMPOWER PLS is a lifestyle investment strategy, which is administered by Irish Life and invested by Irish Life Investment Managers.

Where a member has in excess of 20 years to their Normal Retirement Age (NRA), the investment emphasis is on equities and other growth assets, and in the last 20 years up to an individual's NRA, there is a gradual switch out of equities and into less risky assets.

When a member is within 6 years of their NRA, the PLS strategy will automatically move the member into investment funds which will match how the member will draw down their pension benefits on retirement.

The Trustees will monitor the performance of the all the selected funds on a regular basis.

Environmental, Social and Governance (ESG):

The Trustees are conscious of the need to take account of ESG factors when making investment decisions and included a specific question re ESG in the 2021 RFP.

“ESG and sustainability issues and the incorporation of these considerations into the Schemes investment options are particularly important to the Trustees. Tenderers should set out their ESG credentials/expertise, how they have incorporated ESG into their investment solutions, what further ESG related changes they intend to implement in the future. In particular, how ESG considerations are incorporated into the default strategy should be clearly set out”.

Apart from the Cash and the Annuity Objective Funds each of the fund options available to members have an Article 8 ESG designation.

Statement of Investment Policy Principles:

A Statement of Investment Policy Principles has been put in place and this will be reviewed every 3 years or more frequently if there is a fundamental change to the investment strategy or the funds that are made available to members. The current SIPP has an effective date of April 2022, having been updated to incorporate ESG considerations and the transfer of the Scheme to Irish Life on 1st January, 2022.

Statement of Investment Governance:

The Trustees have a Statement of Investment Governance in place effective from July 2023. The Statement of Investment Governance will be reviewed every three years or sooner if deemed appropriate. The key components of the objectives and strategy will be incorporated into any critical review or market review that the Trustees undertake.

BENEFIT PAYMENTS:

The Trustees recognise their duty to ensure benefits that are paid from the Scheme are accurate and paid in a timely fashion. Payment of benefits can arise in the following situations:

1. Normal Retirement Date
2. Early Retirement
3. Ill Health Early Retirement
4. Late Retirement
5. Leaving Service
6. Death in Service

- The Trustees have delegated the payment of retirement and leaving service benefits to the Registered Administrator, Irish Life.
- The Trustees have agreed timescales with Irish Life to ensure that claims are settled in a timely fashion and that there are no regulatory breaches. These timescales are incorporated into the SLA and the Trustees obtain a quarterly report from Irish Life detailing adherence with these timescales.
- The Professional Trustee approves retirement and leaving service benefits (transfers out) before benefits are paid out.
- The Trustees will obtain written confirmation on an annual basis from Irish Life that the appropriate taxes on all benefits have been accounted for.
- The Trustees will obtain written confirmation from Irish Life that they have applied AML checks on all claim payments.

Ill Health Early Retirement:

Where a member submits a request to retire early on ill health grounds, a declaration is sought from the members specialist consultant (not GP) to confirm that the member satisfies the revenue definition of serious ill health. If the request is for the “death’s door concession” approval will also be obtained from the Registered Administrator. Where the member and one of the Trustees works for the same employer, that Trustee will not partake in the decision-making process for that particular ill health application request.

Death in Service Claims:

It is recognised that in the unfortunate event of a Scheme member dying, the Trustees must exercise their discretion in deciding to whom the lump sum benefits will be paid. Every effort will be made to establish the full facts and circumstances of the claim and the personal situation of the deceased member. As much information as possible will be obtained, including the following data, prior to any decision being made:

- Expression of Wishes form / beneficiaries.
- Copy of Will.

- Any information provided by Solicitors dealing with the death claim.
- Any information received from family members / relatives.
- Background information from their employer.
- Other sources of information such as RIP.ie.

All Trustees will be consulted before a final decision is made. Where the deceased member was employed by the same employer as one of the Trustees, that Trustee will not participate in the decision-making process in respect of whom should benefits be paid, but may be asked for relevant background information.

Payment to Minor Children:

Where a decision is taken to pay a benefit to a minor child, the benefit will (depending on the size of the benefit) will either be:

- (a)** Paid to a guardian.
- (b)** Paid into a Trust that is set up for the minor child by the guardian.

In both cases the Trustees seek agreement that the money is held until the minor child reaches the age of 18, but there is also provision which allows money to be used for the minor child's upkeep prior to them attaining age 18.

Excess Funds:

The Trustees will calculate the maximum lump sum that can be paid out for a death claim in line with revenue limits and if there is an excess arising the Trustees will:

- Identify the most appropriate dependant.
- Ascertain from the dependant if they wish the excess to be used to purchase an annuity or invest in an ARF (if the dependent is over 18). If the dependant wishes to purchase an annuity, the Trustees will engage a broker to identify the most competitive annuity rate and purchase the annuity from that company.

The decisions of the Trustees will be minuted.

RECORDS:

The Trustees have established procedures and agreements for effective record keeping both in relation to membership and financial records.

- The Pension Scheme Manager will maintain the following records:
 - ✓ All scheme documentation.
 - ✓ Minutes of Trustee meetings.
 - ✓ Correspondence with participating employers, members, Irish Life, Cornmarket and Aviva, Key Function Holders, and from other parties or individuals.
- The Pension Scheme Manager has robust procedures in place whereby Trustee files are backed up on a regular basis.
- It has been agreed that James Skehan will also keep copies of scheme documentation and minutes of Trustee meetings.
- The Registered Administrator appointed by the Trustees will hold the administration and membership records for the Scheme on behalf of the Trustees. The RA has robust contingency / disaster recovery plans in place to protect administration records.
- It is noted that the Registered Administrator (RA) is required as one of their key functions to maintain sufficient and accurate records of members and their entitlements. The Trustees will seek confirmation on an annual basis that the RA's licence has been renewed by the Pensions Authority.
- The Trustees will ensure that all aspects of GDPR are adhered to by both the Trustees, the Pension Scheme Manager and all third parties.

RISK MANAGEMENT:

The Trustees have a risk management system in place to ensure that all actual and potential risks are identified and managed.

The Trustees have established a risk management register which has identified:

- (a) The likely / possible risk.
- (b) The likely impact on the scheme and its members in the event that the risk materialises.
- (c) Applied a scoring system 1 – 5.

The Trustees have established a series of controls to manage and mitigate the risks using a range of sources/reports. The Trustees will review and update the Risk Register on an ongoing basis and carry out a full review on an annual basis.

To comply with IORP II, the Trustees have appointed Frankie Cronin, Grant Thornton as the Scheme's Risk Management Key Function Holder.

The Risk Management KFH will assist the Trustees in developing a forward looking, risk-based strategy, in the preparation of an Own Risk Assessment (ORA) which is due to be signed off prior to 22nd April, 2024 deadline, and will report to the Trustees on a quarterly basis.

MEMBER ENGAGEMENT:

The Trustees recognise the importance of members understanding the benefits that are being provided for them and the characteristics of each of the investment funds that are made available. A key element of this understanding is to ensure that the information is:

- Provided in a clear and understandable fashion and which addresses the members' needs.
- Avoids the use of the jargon and technical terms.
- Presented in a way that is easy to read and highlights key information.

And that members are:

- Regularly informed regarding the progress of their pension fund and whether they are on track to meet their retirement goals.
- Informed of the option to increase their level of contributions and how this can be achieved.
- Informed regarding the cost and charges, particularly the difference in the management charges and total expense ratios that apply to the different fund choices.
- Fully aware of the benefit and investment options available to them.

The Trustees employ a range of communication tools to engage with members on a proactive basis including:

Member Booklets:

Member booklets are reviewed on a regular basis to ensure that they continue to provide members with information in a clear and user-friendly fashion.

There are a range of member booklets available online at www.fedvol.ie ([click on pensions tab](#)) including the following:

- (a) Member Booklet
- (b) Investment Choice Booklet
- (c) Approaching Retirement Booklet

Ongoing Engagement:

To keep members informed of the Scheme and the ongoing activity associated with it, the Trustees:

- (a) Issue a cover letter with the Pension Benefit Statement.
- (b) Issue two Newsletters each year.
- (c) Arrange for members to be engaged with by the Scheme advisors at regular intervals but particularly when they are within 15 years of retirement.

Member Presentations:

Irish Life have appointed a dedicated Member Engagement and Member Advice Team point of contact to each participating employer of the Pension Scheme.

The purpose of the Member Engagement Team is to work with the Trustees, Pension Scheme Manager and Employers to provide information in different formats to educate members on how to take positive steps towards improving their pension outcome.

The purpose of the Member Advice Team is to provide one-to-one advice to members at appropriate times in their retirement saving journey.

At the start of each year an Engagement Programme for the following 12 months will be agreed between Irish Life and the Trustees.

Pre-Retirement & Life Planning Seminars:

The Pension Trustees organise Retirement Planning Seminars a number of times each year to support and provide valuable information to Scheme members. Members who are retiring within 5 years are invited to attend these seminars.

The seminars are a one-day event and are free of charge for members and their spouse / partner to attend. Tea / coffee breaks and lunch is provided to delegates attending on the day. The number of participants who can attend the Pre-Retirement Planning Seminars is limited to approx. 25 members, plus partners, to facilitate one to one engagement and also to ensure participant’s maximum value of time and information at these events.

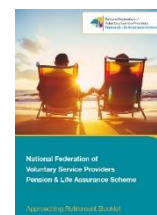
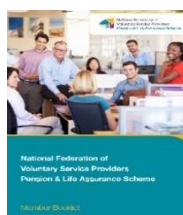


WEBSITE:

A full range of all member booklets and forms, and other pension publications, including the following, are available on the National Federation’s website www.fedvol.ie and then click on the Pensions Tab:

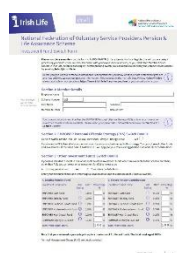
Booklets:

- Pension Scheme Booklet
- Investment Choice Member Booklet
- Approaching Retirement Member Booklet



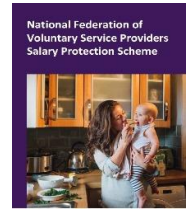
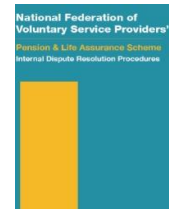
Forms:

- Member Application Form
- Beneficiary / Expression of Wishes Form
- Investment Fund Switch Form
- Death Claim Form



Other Booklets / Updates:

- Investment Updates
- Trustees Annual Report & Financial Statements
- Statement of Investment Policy Principles
- Trust Deed & Rules
- Group Life Policy Document
- Death in Service – FAQs document
- Internal Dispute Resolution Procedure
- Data Protection Notice
- Pension Scheme Newsletters
- Salary Protection Scheme Booklet & Application Form



Videos:

- Scheme Information Video
- How to get access to your Irish Life Member Portal
- What is the Personal Lifestyle Strategy (PLS) and how does it work?
- Additional Voluntary Contributions (AVCs)
- What fees (Annual Management Charge) are applied to your pension fund and how are they calculated?
- Approaching Retirement Video
- Deferred Members Guidance Video
- Environmental, Social and Governance (ESG) video - outlines how Irish Life are committed to growing your money and doing it responsibly.
- Nature of long-term investing.



REMUNERATION POLICY:

The Trustees have published a Remuneration and other Charges Policy, which documents how fees and other charges incurred by the Trustees and the members have been agreed and how they are reviewed on an ongoing basis. The Trustees recognise that they have a legal responsibility to act in the best interest of their members. An important part of this responsibility is to ensure that the Scheme members are obtaining value for money. The Trustees acknowledge that in determining value for money, the costs and charges need to be assessed against the benefits & services provided.

Written Policies:

The Trustees have written remuneration agreements with a range of third parties who provide services to the Trustees and the members:

- Irish Life as the administrator of the Pension Scheme.
- Cornmarket as the administer for both the Life Assurance Scheme and also the administration fee, which they collect from each employer and remit to the Trustees on a monthly basis.
- James Skehan who is the Scheme's Professional Trustee.
- The National Federation of Voluntary Service Providers Secretariat who provide support staff and office facilities to the Trustees.
- Key Function Holders:
 - Internal Audit: Tom Gilligan, Align Advisory
 - Risk Management: Frankie Cronin, Grant Thornton
- External Auditor, Mazars, who audit the Trustee Annual Report and Accounts.

Review of Charges:

The Trustees undertake a regular review of all charges incurred by the members and the Trustees including:

- Regular engagement with Irish Life to review the management charge paid by members as the fund size increases.
- A market review/ RFP to be undertaken every 3-5 years to identify the most suitable pension provider taking into account the quality of the service offering and the cost of same.
- The cost of the group life unit rate is reviewed every 3-4 years and this market review is managed by Cornmarket on behalf of the Trustees.

- The Trustees will typically seek three quotations for any professional services that are required and follow the “open procedure” as per the EU Directive 2014/24/EU where required and the successful tenderer will be selected on the basis of the Most Economically Advantageous Tender (MEAT) received.

- The Trustees will seek to negotiate reduction in associated charges such as the level of commission on life assurance and indemnity insurance premiums at renewal / review dates.

OUTSOURCED ACTIVITIES:

The Trustees have a number of agreements with third parties who provide professional services to the Trustees and these arrangements are governed by written agreements with each of the parties.

Irish Life:

Irish Life are the appointed Registered Administrator for the NFVSP Pension Scheme and there are two agreements in place from January 2022:

- (a)** An Administration Services Agreement
- (b)** A Service Level Agreement.

Cornmarket:

Cornmarket manage the administration of the Group Life Scheme and undertake market reviews every 3-4 years. The current review was completed in February 2024 with Aviva offering the most competitive unit rate for the next 4 years, at which stage a new market review will be completed.

National Federation of Voluntary Service Providers Secretariat:

The Trustees obtain the services of the Pension Scheme Manager and administration back up for the Pension Scheme Manager, together with the provision of office and related support facilities.

External Auditor:

Mazars are the current External Auditor appointed to the Scheme.

Professional Trustee:

James Skehan is the appointed Professional Trustee (from January 2020, on a 3-year rolling contract).

Approval and Next Review Date of this Policy:

This document was approved and came into effect as follows:

Document Control	
Approved By:	Mr John McHugo Pension Scheme Chairman, National Federation of Voluntary Service Providers' Pension & Life Assurance Scheme
Approved by:	Mr James Skehan, Professional Trustee and Vice Chairman, National Federation of Voluntary Service Providers' Pension & Life Assurance Scheme
Date approved	18 th April, 2024
Next review date	18 th April, 2027
Previous versions	6 th July, 2021; 27 th January, 2022



Signed:

John McHugo,
Chairman.


Date: 18th April, 2024



Signed:

James Skehan,
Professional Trustee and Vice Chairman.

Date: 18th April, 2024

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Pension Authority No: PB67866

Revenue Approval No: SF7346

PENSION TRUSTEES: Mr. John McHugo, (Chairman);
Ms. Pauline Brennan; Mr. Francis Coughlan; Ms. Deirdre Herlihy
and Mr. James Skehan (Professional Trustee).