Scheme Registration Number: 10232231

The Ryanair UK Pension Plan

Trustee’s Report and Financial Statements for the year ended 31 December 2021

The Ryanair UK Pension Plan
Annual Report for the year ended 31 December 2021

Contents

The Ryanair UK Pension Plan
Trustee and Advisers

Principal Employer

Ryanair DAC
Departure Lounge
Stansted Airport
Stansted
Essex
CM24 1RW

Trustee

APT Workplace Pensions Limited

Plan Administrators

Deloitte Total Reward and Benefits Limited
Lincoln Building
27-45 Great Victoria Street
Belfast
BT2 7SL

Scheme Actuary

Gregor Law FFA
Deloitte Total Reward and Benefits Limited
Lincoln Building
27-45 Great Victoria Street
Belfast
BT2 7SL

Independent Auditors

Baker Tilly Mooney Moore
Chartered Certified Accountants
17 Clarendon Road
Clarendon Dock
Belfast
BT1 3BG

Banker

Danske Bank

Investment Manager

Final Salary Section and Money Purchase Section

Standard Life Assurance Limited
1 George Street
Edinburgh
EH2 2LL

Custodian:
Citigroup
33 Canada Square
Canary Wharf
London
E14 5LB

Additional Voluntary Contribution (AVC) Providers

Final Salary Section

Utmost Life and Pensions
Walton Street
Aylesbury
Bucks
HP21 7QW

Money Purchase Section

Standard Life Assurance Limited
1 George Street
Edinburgh
EH2 2LL

Legal Advisers (Final Salary Section)
BDB Pitmans LLP
One Bartholomew Close
London
EC1A 7BL

Investment Advisers

Deloitte Total Rewards and Benefits Limited
Saltire Court
20 Castle Terrace
Edinburgh
EH1 2DB

Further information

Any enquiries regarding the Plan should be made to:

Mr Neil Burns
Deloitte Total Reward and Benefits Limited
Lincoln Building
27-45 Great Victoria Street
Belfast
BT2 7SL
neburns@deloitte.co.uk

The global economic and investment picture during 2021 was less turbulent than the prior year. Leading UK equity indices showed positive returns in each quarter of the year. Overall economic growth was strong compared to the contractions experienced during 2020.

Governments, central banks and investment markets continued to battle with the effects of the coronavirus ("COVID-19") pandemic throughout 2021. The first vaccinations became publicly available in early 2021, and became vital tools to combat the spreading of the virus and the emergence of new mutations.

Restrictions in the world's major economies were gradually lifted over the course of 2021 and early 2022 and governments began to wind down policy commitments, such as the UK's furlough scheme which closed on 30 September.

The transition period for the UK leaving the EU was finally concluded on 31 December 2020. The UK has continued to sign trade agreements with dozens of countries around the world, either to maintain prior arrangements or to strike new agreements. Talks with the United States were paused during 2021 as President Biden took office but are expected to restart in 2022. Negotiations to enter the Comprehensive and Progressive Agreement for Trans-Pacific Partnership ("CPTPP") are close to concluding.

Looking into 2022, major geopolitical events continue to affect financial markets. Russia invaded Ukraine on 24 February. The world's major economies placed severe economic sanctions on Russia, including exclusion from the SWIFT banking system, and on significant Russian individuals. There remains uncertainty as to how global supply chains will respond to these events, particularly the global energy market as Russia is a large energy exporter.

The UK is experiencing a cost-of-living crisis not seen for many years. Inflation began to spike in late 2021, reaching 6.2% by the Consumer Price Index measure in the year to February 2022, with the possibility of prolonged inflation throughout the year. There is concern that high inflation will dampen expected economic growth throughout 2022.

We have paid close attention to the potential risks affecting the Plan in light of market volatility and geopolitical uncertainty. We held a Trustee meetings on 16 June 2021, 16 December 2021 and 13 April 2022. Ryanair DAC ("the Company") attended the meetings and provided updates on the Company's financial position. We consider that the employer covenant to the Plan continues to remain strong. The Risk Register has also been monitored on an ongoing basis.

We have continued to monitor the performance of the Ryanair UK Pension Plan ("the Plan") assets and the overall funding position of the DB section of the Plan. The latest triennial actuarial funding valuation of the Plan, with an effective date of 1 January 2020, was completed on 31 March 2021, disclosing a funding level of 77%. An annual actuarial report as at 1 January 2021 was completed in September 2021 and showed an increase in the Plan's deficit from c.£3.6m to c.£4.5m, and a fall in the funding level to 73%, mainly as a result of a fall in gilt yields over the period. Since then, the funding position has improved as a result of deficit contributions paid by the Company and strong investment performance, partially offset by changes in financial conditions over the period. The next annual actuarial report will be carried out with an effective date of 1 January 2022.

Between 1 January 2021 and 1 March 2021, the Company continued to pay deficit repair contributions of £452,000 per annum to the DB section of the Plan, in line with the Schedule of Contributions dated 12 September 2017. A new Schedule of Contributions was agreed on 31 March 2021 and as part of this, the Company agreed to pay deficit contributions of £452,000 per annum between 1 March 2021 and 30 June 2021, increasing to £552,000 per annum between 1 July 2021 and 1 June 2026. The Company also pays all administration and Pension Protection Fund levies.

We continued to have discussions with the Company on the investment strategy for the DB section of the Plan during the year, to ensure that it remains appropriate and complies with best practice. Deloitte’s investment team presented recommended updates to the investment strategy to the Trustee and Company in the 16 June 2021 Trustee meeting, and follow-up actions were agreed. Deloitte’s investment team are currently seeking appropriate providers for transferring the funds. A review of the Statement of Investment Principles for the DB Section will be undertaken as part of the investment review.

Details of the Statement of Investment Principles of the DC Section are included in the Statement Regarding DC Governance.

As Trustee of the Plan (“the Trustee”), I personally will continue to ensure that the Plan remains well governed, and focuses on the security of the members’ current and future pensions.

Excerpts of this Statement are available to view here: https://investor.ryanair.com/corporate-governance/

APT Workplace Pensions Limited

Introduction

The Trustee of the Ryanair UK Pension Plan ("the Plan") is pleased to present its Report and the audited Financial Statements of the Plan to the members for the year ended 31 December 2021. The main purpose of this Report is to provide general information about the Plan. It is not meant to provide details of the way the Plan works, nor specific personal data, as such information is contained in the Plan booklet and members' Individual Annual Statements respectively.

The Plan

The Ryanair UK Pension Plan was established under an Interim Trust Deed dated 26 February 1998. The operation of the Plan was initially governed by a Definitive Trust Deed dated 3 April 2001. The Definitive Trust Deed and Rules, prepared for the Plan dated 29 January 2004, established the Money Purchase section under the Plan. The Plan is currently governed by this Trust Deed and Rules, and amendments thereto.

The Final Salary Section of the Plan closed to future accrual with effect from 31 December 2015. Members of the Final Salary section of the Plan transferred to the Money Purchase section on this date, leaving their pension accrual up to this date in the old Final Salary section as deferred members.

Any queries regarding the Plan should be made to the Plan Administrators at the address on page 1.

Trustee of the Plan

The Trustee is responsible for the management of the Plan.

During the year under review the Trustee of the Plan has been APT Workplace Pensions Limited. The Trustee Directors who served during the year are as follows:

Vincent Boyle
Kirstyn Switzer
Eamonn McGrath

APT Workplace Pensions Limited has no connection to the Principal Employer (Ryanair DAC) or to the wider group.

As the Trustee is an Independent Professional Trustee, the Plan is not required to comply with the requirements of the Member Nominated Trustee requirements imposed by the Pensions Act 2004. The provisions relating to the appointment and removal of the Trustee Directors are in the articles of association.

In accordance with the Plan's Trust Deed and Rules, the Principal Employer, Ryanair DAC retains the power to appoint and remove the Trustee of the Plan, subject to certain conditions.

Further information about the Plan is given in the explanatory booklets which are available to all the relevant members.

There was two Trustee meetings during the year.

Financial Review

The Fund Account on page 30 shows that the net addition arising from dealings with members for the year was £3,351,885. The net return on investments during the year was a gain of £6,743,803. The Plan's assets for the same year therefore increased by £10,095,688 to £77,264,748.

The Plan's Financial Statements have been prepared and audited in accordance with regulations made under sections 41(1) and 41(6) of the Pensions Act 1995.

Changes to the Plan

A deed of amendment was signed on 7 May 2021 detailing an amendment to the rules with effect from 1 July 2020 in respect of rates of contributions for members of the Money Purchase section of the Plan.

Investments

The Trustee has a responsibility to seek to ensure that the Plan's assets are properly invested, and also that a satisfactory return is achieved through an acceptable level of risk. The Trustee regularly reviews the performance being achieved by the investment manager, although the Trustee is not involved in the day to day investment decisions.

The Trustee has produced a Statement of Investment Principles as required by section 35 of the Pensions Act 1995. This Statement forms the basis of investment decisions made on behalf of the Plan and is used to monitor the performance of the investment manager. All investments held by the Plan during the year were in accordance with the Statement. A copy of the Statement is available from the Plan Administrators at the address on page 1.

During the year the Plan's investment assets were managed by Standard Life Assurance Limited for the Final Salary and Money Purchase sections. The pooled investment vehicle units are registered in the name of the Trustee, whilst the underlying investments represented by these holdings are held on the manager's behalf by third party custodians. The AVC investments at Utmost Life and Pensions are held in the name of the Trustee.

Investment management fees are borne by the Plan and are charged in accordance with the investment manager's scale of charges. A report from the investment manager can be found on pages 12 to 15.

Coronavirus (COVID-19) and the Trustee's consideration of going concern

This report and the accompanying financial statements relate to a period during the COVID-19 pandemic and the ensuing health and financial crisis. The Trustee has monitored the impact on Plan's funding, investments and employer covenant, and is following advice from The Pensions Regulator and duly appointed Plan's advisers. Since the date of the last triennial funding valuation as at 1 January 2020, the deficit has decreased. The key reasons for the improvement in the funding position are deficit contributions paid by the Employer and strong investment performance, partially offset by changes in financial conditions over the period.

Pension Increases

All pensions were increased in accordance with Plan Rules during the year. No discretionary increases were awarded during the year.

Contributions

Final Salary Section

Following the Actuarial Valuation as at 1 January 2017 the Principal Employer was due to pay deficit reduction contributions of £452,000 per annum from 1 January 2017 for ten years. A new Actuarial Valuation was completed as at 1 January 2020 and signed by the Scheme Actuary on 31 March 2021. The new Schedule of Contributions stated that the Principal Employer will pay deficit reduction contributions of £452,000 per annum from 1 March 2021 to 30 June 2021 and £552,000 per annum from 1 July 2021 for 5 years.

During the year, contributions for August 2021 were received later than the date set out in the Schedule of Contributions. This is referred to more fully in the Summary of Contributions on page 46.

Money Purchase Section

All contributions have been paid in accordance with the rules of the Plan.

Actuarial Status of the Plan

The latest funding valuation of the Final Salary Section of the Plan ("the Valuation") was completed as at 1 January 2020 ("the Valuation Date") and published on 31 March 2021. As part of the Valuation, the Trustee and the Principal Employer agreed a new Recovery Plan and Schedule of Contributions. The results of the Valuation are outlined below.

Following a consultation process, a decision was taken to close the Final Salary Section of the Plan to future accrual from 31 December 2015. On this date all active members of the Plan became deferred members.

The next funding valuation will be completed as at 1 January 2023 and must be finalised within 15 months of this date.

Actuarial Liabilities (Final Salary Section of the Plan)

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

Under Section 222 of the Pensions Act 2004, every scheme is subject to the Statutory Funding Objective, which is to have sufficient and appropriate assets to cover its technical provisions, which represent the present value of benefits to which members are entitled based on pensionable service to the Valuation Date. This is assessed at least every 3 years using assumptions agreed between the Trustee and the Principal Employer and set out in the Statement of Funding Principles, a copy of which is available to members on request.

Actuarial Liabilities (Final Salary Section of the Plan) (continued)

The latest valuation of the Plan, performed by the Scheme Actuary, Gregor Law FFA, was completed as at 1 January 2020 and the Scheme Actuary's Report was published on 31 March 2021. The Valuation was carried out under the Pensions Act 2004 and used the Defined Accrued Method.

Following discussions with the Principal Employer, Ryanair DAC, the Trustee determined and agreed the assumptions used to calculate the 'technical provisions'. This is the amount needed to be held by the Plan to provide the benefits that will be paid from the Plan in the future, assuming it continued in its present form. The calculation is based on assumptions about various factors that will influence the Plan in the future, such as the levels of investment returns and pension increases, when members will retire and how long members will live.

The main assumptions underlying the Valuation were:

Pre-retirement discount interest rate	3.90% p.a.
Post-retirement discount interest rate	2.20% p.a.
Retail Price Inflation ('RPI')	3.20% p.a.
Consumer Price Inflation ('CPI')	2.20% p.a.
Deferred pension revaluation (based on CPI)	2.20% p.a.
Increases to pensions in payment:	
Pension accrued prior to 1 December 2007	3.10% p.a.
Pension accrued post 1 December 2007	2.20% p.a.
Mortality:	
Base table	100% of SAPS 'S3' Pensioner tables (based on YoB)
Longevity improvements	CMI 2019 projections with a long-term trend of 1.5% p.a., smoothing parameter of 7 and A factor of 0%

A summary of the funding position at the Valuation Date is as follows:

Assets and Technical Provisions	£'000
Total technical provisions	15,453
Market value of assets	11,856
Surplus/(Deficit)	(3,597)
Funding level	77%

Between 1 January 2020 and 1 March 2021, the Principal Employer continued to pay deficit reduction contributions of £452,000 p.a. in line with the previous Schedule of Contributions dated 12 September 2017.

Actuarial Liabilities (Final Salary Section of the Plan) (continued)

In March 2021, the Trustee and Principal Employer agreed an updated Recovery Plan and Schedule of Contributions. As part of this, the Principal Employer agreed to pay deficit reduction contributions as follows:

	£'000 p.a.
Between 1 March 2021 and 30 June 2021	452
Between 1 July 2021 and 1 June 2026	552

The Principal Employer also agreed to cover administrative expenses, insurance premiums and levies payable in respect of the Plan.

A Recovery Plan and Schedule of Contributions reflecting the agreed contributions were adopted by the Trustee and the Principal Employer on 31 March 2021. The Scheme Actuary's certification of this Schedule is shown on page 25

If the Principal Employer goes out of business or decides to stop contributing to the Plan, the Plan may be "wound-up" and the Principal Employer could be required to pay additional money to buy all members' benefits from an insurance company. The comparison of the Plan's assets to the cost of buying the benefits from an insurance company is known as the "buy-out position." A pension scheme's buy-out position will often show a weaker position than the standard actuarial valuation as insurers are obliged to take a very cautious view of the future, and they also need to make a profit.

The Valuation at 1 January 2020 showed that the Plan's assets would not have been enough to buy all members' benefits from an insurance company, as the "buy-out position" at that date was:

	£'000
Estimated cost of buying benefits with an insurance company	24,747
Market value of assets	11,856
Surplus/(Deficit)	(12,891)
Funding level	48%

This does not mean that the Company is thinking of winding up the Plan. The fact that there was a shortfall at the Valuation Date has not affected the pensions paid from the Plan and all members who have retired have received the full amount of their pension.

It is worth remembering that a funding valuation is just a "snapshot" of the Plan's funding position and it can change considerably if there are sudden changes in share prices or gilt yields, or members live longer than we expect.

Membership

Details of the membership of the Plan are given below:

	Active Members		Deferred members		Pensioners	
	Final Salary	Money Purchase	Final Salary	Money Purchase	Final Salary	Money Purchase
Total as at 1 January 2021	-	372	67	408	25	-
New Entrants	-	32	-	-	-	-
Rejoiners	-	104	-	(104)	-	-
Deferred pensions (switches out)	-	(14)	-	14	-	-
Retirements	-	-	(2)	(3)	2	-
Transfers out	-	(3)	(1)	(10)	-	-
Deaths	-	(1)	-	-	-	-
Total as at 31 December 2021	**-**	**490**	**64**	**305**	**27**	**-**

At 31 December 2021, 18 (2020: 20) members had membership in both the Final Salary Section and the Money Purchase Section of the Ryanair UK Pension Plan.

Final Salary Investment Report

Investment managers

Your investment holds units in the following Standard Life Funds in accordance with the provisions of a Standard Life Trustee Investment Plan policy. Standard Life Assurance Limited has delegated its investment management function to abrdn Investment Management Limited.

Statement of assets

Fund	Number of units	Value (GBP)	Holding (%)
Standard Life Managed	183,608	12,819,651	100.0
TOTAL		12,819,651	

Performance

Fund Benchmark	12 months to 31/12/2021 (%)	3 years to 31/12/2021 p.a. (%)	5 years to 31/12/2021 p.a. (%)
Standard Life Managed	9.9	9.8	6.6
ABI (Pension) Mixed Investment 40-85% Sector average	10.7	9.8	6.3

Fund performance figures are calculated net of annual management charge (excluding any rebates) over the stated periods, with net income reinvested.

Global Overview

Globally, stock markets rose significantly over the past 12 months. Covid-19 was still the dominant factor at the beginning of the period, although stock markets had already begun their recovery from the lows of March 2020.

Supportive monetary and fiscal policy was prevalent over the period. The US Federal Reserve (Fed) maintained the main US rate at near zero throughout the review period, while providing support through its bond-buying programme. Elsewhere, the European Central Bank (ECB) had earlier ramped up its original €1.35 trillion stimulus plan to €1.85 trillion in December 2020. The US Congress passed two additional stimulus packages during the period, cumulatively worth around US$2.8 trillion. In August 2021, the US Senate passed the US$1 trillion infrastructure deal.

At the beginning of the period, momentum stalled as global bond markets experienced a marked sell-off, spurring worries that this could impact the fragile global recovery. This also negatively affected equities. However, equity markets resumed their upward momentum, driven by economic optimism, vaccine rollouts, continued accommodative monetary policy and a strong corporate reporting season. The MSCI World Index reached a record high in August but sold off in September, as concerns grew over inflation and interest rate hikes. Markets began to rally again in October on the back of strong corporate results and, despite selling off in late November amid the emergence of the new Omicron variant of Covid-19, continued their rise into the end of the year.

UK

The UK stock market ended the period notably higher. During a period of considerable upheaval, investors grappled with the economic fallout from the coronavirus pandemic and concerns about rising inflation. However, the easing of lockdown restrictions, amid the effective vaccine rollouts, maintained the positive sentiment for most of the period. Smaller domestic companies outperformed larger companies on the FTSE 100 Index.

The positive momentum in UK equity markets took a brief pause in January 2021 before picking up again in February and thereafter. Supportive government policy, easing lockdown restrictions, positive earnings results and an admirable vaccine rollout all drove markets upwards.

Despite concerns about the spread of the Delta variant of Covid-19, the Government lifted lockdown restrictions at the end of July. There has been a welcome recovery in economic activity, but this put a strain on supply chains. Most recently, the disruption caused by the ongoing fuel shortage dented sentiment.

In economic news, although first-quarter 2021 numbers showed a 1.4% quarterly decline in gross domestic product due to nationwide lockdowns, economic growth rebounded by 5.4% in the second quarter. Inflation has continued to rise in the UK, exacerbated by the pressure on supply chains, and the Bank of England increased interest rates to 0.25% in December. However, it did maintain targets for bond purchases.

In the Autumn Budget, the chancellor announced a large increase in public spending, a reduction in business rates and a cut in air duty for domestic flights at the expense of long-haul trips.

US

US equites made strong gains during the last 12 months due to a successful vaccine rollout, economic reopening and rising growth estimates. A further boost came from the enactment of a US$1.9 trillion stimulus package. However, stubbornly high Covid-19 cases, rising inflation and supply-chain issues meant US equities pulled back from recent highs at the end of the period.

Early on, the roll out of mass inoculation programmes acted as a catalyst for a sharp rotation away from growth stocks to cyclical stocks and those companies that suffered the most from lockdown restrictions. On the political front, Joe Biden was formally inaugurated as US president at the beginning of the period. Share prices continued to appreciate throughout the spring and into the summer, driven mainly by investors' ongoing optimism regarding the distribution of Covid-19 vaccines and generally positive economic data.

In September 2021, inflation expectations worsened and helped lead to a substantial downturn in US equities. Investors were concerned by supply-chain challenges and continued Covid-19 cases. In addition, the Fed also noted that a reduction in quantitative easing could be coming soon. This materialised in early November when the Fed confirmed that it would reduce bond purchases by US$15 billion each month. Meanwhile, investors reacted positively to President Biden's reappointment of Fed Chair Jerome Powell, indicating stability and the continuity of existing policy.

In November, the S&P 500 Index, fuelled by a strong results season, hit new highs for eight consecutive days – a record streak last achieved in 1997. The rally broke late in the month, as the headlines became dominated by news of the Omicron variant of Covid-19. Stocks started to move up again in December, boosted by retailers, as concerns surrounding the impact of Omicron eased.

Europe

European shares (excluding the UK) finished substantially higher over the 12 months. Equities gained at the beginning of the period, helped by the earlier rollout of vaccinations, a new Brexit trade deal, the Biden victory and the €500 billion expansion of the ECB's monetary stimulus programme all driving markets upwards.

However, this upward momentum halted towards the end of January 2021, and most European indices fell amid renewed lockdown measures. Nevertheless, the region's equities performed well from February until the end of the period, despite ongoing lockdown measures and rising Covid-19 cases.

After rising for seven consecutive months, European shares fell again in September, with Germany among the worst performers. Outgoing Chancellor Angela Merkel's Christian Democratic Union-Christian Social Union bloc lost out to the Social Democratic Party in the federal election, although forming a coalition government is expected to take some time.

September saw Norway's Norges Bank became the first major developed bank to raise interest rates since the start of the pandemic. Attempting to reassure investors that the ECB would not follow suit, President Christine Lagarde said the central bank would not taper bond market support. However, with the Eurozone's November inflation print reaching its highest level since the introduction of the euro, the ECB indicated it would end its Pandemic Emergency Purchase Programme in March 2022. Eurozone officials also acknowledged that rising inflation may not be as short-lived as predicted.

Asia Pacific

Equity markets in the Asia Pacific (excluding Japan) region declined over the 12 months. The period began positively, with markets supported by loose monetary policy by Asian central banks, improving economic data and vaccine rollouts. Several Asian markets reached record highs as a result. However, regional markets corrected thereafter, as a jump in bond yields dented investor confidence, while fresh waves of Covid-19 infections prompted renewed restrictions across several countries. Volatility persisted throughout markets in the second half of the period, amid growing worries that inflation may persist even after global growth has peaked. Meanwhile, the emergence of the new Omicron variant and monetary-tightening measures by central banks further weighed on markets into year-end.

Chinese equities underperformed the wider region. Aside from persistent tensions with the US, Chinese stocks were also buffeted by increased regulatory scrutiny across sectors and a resurgence in Covid-19 cases, particularly given the country's zero tolerance approach. Investors also fretted over property developer Evergrande's unresolved debt crisis, which led to worries of wider systemic risk within the real estate and financial sectors. Other headwinds included the country's power crunch and slowing economic momentum amid the property market downturn. Policy was a bright spot, however, thanks to subdued inflation. The People's Bank of China lowered its benchmark lending rate and cut the reserve requirement ratio for banks, while policymakers signalled further action to stabilise the economy. Conversely, Indian stocks rallied, buoyed by the country's vaccine rollout and improving macro backdrop. Taiwanese equities also outperformed on the back of robust semiconductor demand.

Japan

Equities in Japan increased over the 12 months. While the coronavirus pandemic continued to dominate sentiment at the beginning of the period, stimulus measures announced earlier in 2020 helped local equity markets to rebound strongly.

Early in the period, markets benefited from positive investor sentiment arising from vaccine breakthroughs, US election results and positive economic data. However, a rise in infection numbers dampened stock returns somewhat. The government declared an emergency lockdown in Tokyo and other economic hubs. Meanwhile, fears of rising infections, the slow vaccination programme and Tokyo entering its third emergency lockdown weighed on markets. However, Japan was one of the strongest major developed markets in August and September as investors reacted positively to the change in the political landscape and an improving Covid-19 picture.

Prime Minister Yoshihide Suga's approval rating sunk to a record low due to the government's handling of Covid-19, and the decision to go ahead with staging the Olympics during a global pandemic. He has since been replaced by Fumio Kishida as leader of the ruling Liberal Democratic Party, and the party comfortably retained power in the election at the end of the month. Kishida's ascent to power was initially welcomed by investors due to expectations of an additional economic stimulus. However, sentiment turned in October, as investors became concerned that the new prime minister would raise taxes on financial income, primarily for the wealthy.

In November, Prime Minister Kishida released details of a stimulus package of almost ¥56 trillion. The proposed measures include direct payments to families with children and support for businesses. There are also plans to support consumers who have been hit by high energy prices.

Corporate Bonds

Corporate bond returns were mixed over the period. Investment-grade bonds were generally flat or down over the period, while high-yield issues showed positive performance.

Fears over the impact of Covid-19 on the credit market, particularly high-yield bonds, had dissipated somewhat by the beginning of the period. Economies had emerged from the first lockdown and the major central banks were purchasing corporate bonds through their stimulus programmes.

Rising Treasury yields at the beginning of 2021 affected markets. However, corporate bonds, particularly high-yield debt, managed to weather the storm reasonably well. As government bond yields stabilised, this robust performance continued through August, even as the Fed said it would begin offloading corporate bonds bought through its pandemic support plan. However, corporate bonds fell in September as minutes from the US Fed's rate-setting committee suggested an increasingly hawkish approach from policymakers, before firming up in the final quarter of the year, despite continuing bond market volatility.

Data shows that the riskiest borrowers now constitute the largest portion of US high-yield issuance in over a decade. Nevertheless, issuances have remained high. High yield continued to outperform investment-grade bonds through much of the period, but this trend reversed in November with the outbreak of the Omicron variant.

Government Bonds

In January 2021, buoyed by the market's anticipation of another stimulus package, 10-year government bond yields in the US, UK and Germany rose (prices fell). Government bond prices then fell sharply across the board in February as inflation expectations climbed. This trend largely continued in March, spurred by dovish central bank statements and rising economic optimism. Eurozone bonds were the exception, with government bond prices rising as the ECB pledged to increase bond buying.

Global government bond prices largely fell from July onwards, amid concerns about a withdrawal of central bank support. Meanwhile, the Bank of Canada surprised markets by ending its quantitative easing programme in September. Soon after, minutes from the US Fed's rate-setting committee signalled changes were on the way, and this came to fruition in November as the Fed started to scale back its bond purchases. Further, inflation jumped to 6.8% in November, a 40-year high. The Fed held interest rates at its December meeting, but policymakers indicated that rates may rise three times in 2022. The central bank also announced that it would accelerate the reduction of the Fed's bond-buying programme.

The trend of falling government bond prices reversed in November as news of the Omicron variant hit bond markets, with investors selling equities and buying government debt. But this was short lived due to more central banks starting to show their hand through December in a bid to combat rising inflation.

UK Commercial Real Estate

The global coronavirus pandemic dominated real estate returns over the period. According to the MSCI monthly index, UK commercial property returned 19.9% over the 12 months to the end of December. The market remains polarised, with offices the weakest at 5.1%, while industrials outperformed at 38.2%.

The office sector is likely to face some major structural challenges ahead. Performance for the sector has held so far this year, but polarisation between the very best and the rest will become more evident in 2022/2023, with the forecast profile reflecting gradual declines in values and rents.

Investment in the UK industrial and logistics sector is expected to hit £15.7 billion by the end of 2021, according to a real estate consultancy firm. This figure represents a 48% increase on the £10.6 billion recorded in 2020. In the first three quarters of 2021, investment reached £12 billion in the sector, and additional investment of around £3.7 billion is expected in the fourth quarter. Investment in the UK industrial and logistics sector is already at all-time highs, according to property data.

Global Absolute Return Strategies (GARS)

GARS delivered a negative return (after fees) in a year dominated by the Covid-19 crisis. News of effective Covid-19 vaccines and their subsequent rollout brought relief to markets throughout the beginning of the period. This positive sentiment persisted throughout most of the 12 months. The emergence of the new Omicron variant of Covid-19 then dominated headlines in November 2021, which negatively affected riskier assets like equities and high-yield bonds. However, these fears subsided somewhat by the end of the period, as the variant appeared less severe than initially expected.

Our corporate bond positions did well, especially high-yield bonds and contingent capital bonds (also known as contingent convertible bonds or 'CoCos'), boosted by supportive central bank and government actions. The themed equity strategies also delivered positive returns. However, we closed our global stable quality, cyclical value and growth recovery strategies, and consolidated our future mobility and US equities exposures into our global equity strategy, given uncertainty over inflationary pressures and the timing of interest rate rises. The latter strategy performed well over the period. Meanwhile, the US equity energy versus utilities, US equity regional banks versus the S&P 500 Index and UK versus European equities strategies lagged, all of which we closed during the period.

Our interest rate strategies were mixed. The US versus German interest rate strategy was a positive contributor. However, the short US real interest rate position weighed on performance, as did the Canadian and Mexican interest rate strategies. Elsewhere, our European yield-curve steepener strategy lost ground as the interest rate curve flattened towards the end of the period. Rising inflation expectations supported our European inflation strategy. However, our short UK inflation position delivered a negative return. Some of our diversifier and defensive strategies also lagged towards the end of the period, such as our favoured defensive foreign exchange (FX) and global FX behavioural relative value positions.

Money Purchase Section

The table below sets out the performance over 1, 3 and 5 years to 31 December 2021 of the five funds, with the highest value at that date, against the benchmarks (where available).

	1 Year % p.a.	**3 Years % p.a.**	**5 Years % p.a.**
Standard Life Stock Exchange Pension Fund	13.8	43.0	46.9
Benchmark: ABI (Pension) Flexible Investment Sector	*13.3*	*39.6*	*43.6*
Standard Life Managed Pension Fund	9.2	32.2	35.5
Benchmark: ABI (Pension) Mixed Investment 40-85% Shares Sector	*10.3*	*33.2*	*37.0*
Standard Life UK Equity Pension Fund	14.3	18.0	15.2
Benchmark: ABI (Pension) UK All Companies Sector	*15.2*	*28.3*	*27.3*
Standard Life At Retirement (Multi Asset Universal) Pension Fund	4.4	19.8	16.4
Standard Life Multi Asset Managed (20-60% Shares) Pension Fund	4.5	19.6	22.1
Benchmark: ABI (Pension) Mixed Investment 20-60% Shares Sector	*6.7*	*21.8*	*22.7*

The Ryanair UK Pension Plan
Statement of Trustee's Responsibilities for the year ended 31 December 2021

The Financial Statements, which are prepared in accordance with UK Generally Accepted Accounting Practice, are the responsibility of the Trustee. Pension scheme regulations require the Trustee to make available to Plan members, beneficiaries and certain other parties, audited financial statements for each Plan year which:

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

- contain the information specified in Regulation 3A of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996 as amended by the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) (Amendment) Regulations 2016, including a statement whether the Financial Statements have been prepared in accordance with the Statement of Recommended Practice (2018), 'Financial Reports of Pension Schemes'.

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

The Trustee is also responsible for making available certain other information about the Plan in the form of an Annual Report.

In respect of the Final Salary Section, the Trustee is responsible under pensions legislation for ensuring that there is prepared, maintained and from time to time revised a schedule of contributions showing the rates of contributions (other than voluntary contributions) payable towards the Plan by or on behalf of the employer and the active members of the Plan and the dates on or before which such contributions are to be paid. The Contributions in respect of the Money Purchase Section are payable in accordance with the rules of the Plan.

The Trustee is also responsible for keeping records in respect of contributions received in respect of any active member of the Plan and for adopting risk-based processes to monitor whether contributions are made to the Plan by the employer in accordance with the Schedule of Contributions and the rules of the Plan. Where breaches of the schedule occur, the Trustee is required by the Pensions Acts 1995 and 2004 to consider making reports to the Pensions Regulator and the members.

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

On behalf of the Trustee

Vincent Boyle, Trustee Director
APT Workplace Pensions Limited
Date:

Kirstyn Switzer, Trustee Director
APT Workplace Pensions Limited
Date:

The Occupational Pension Plans (Plan Administration) Regulations 1996 ("the Administration Regulations") require the Trustee to include an annual statement regarding governance in the annual report.

Statement of Investment Principles (SIP)

The trustee completed a review of the Defined Contribution Section Statement of Investment Principles (SIP) in 2020. The SIP sets out the trustee's primary objectives which are:

- to offer an appropriate range of alternative self-select investment options for members that wish to make their own investment choices, recognising that members may have different needs and objectives;
- to achieve good member outcomes net of fees and subject to an acceptable level of risk; and
- that the expected volatility of the returns achieved is managed through appropriate diversification of asset types in order to control the level of volatility and risk in the value of members' pension pots.

Members are responsible for their own choice of investment options. The accumulated value of a member's pension at retirement can:

- be used to purchase an annuity from an insurance company; or
- remain invested offering members scope to withdraw funds as and when they choose (this is known as a flexible income or income drawdown); or
- be withdrawn in total or part upon retirement (although there will be a tax charge on anything above the 25% tax-free limit); or
- be utilised across a combination of some or all of the above.

The Platform Provider has made available a range of funds to suit the individual needs of the Plan's members. For example, equity funds are available for those members willing to accept a greater level of volatility in pursuit of higher expected retirement savings. Bond and cash funds are offered for those members who are less comfortable with the likely greater volatility of the equity funds.

What is the option for members who do not wish to self select funds

While there is no default investment arrangement for members who do not actively make their investment choices, they can select a lifestyle strategy which automatically moves their investments in the years leading up to their chosen retirement age to reduce volatility. Members can opt out or into the strategy at any time.

The Trustee currently offers one customised lifestyle strategy. This lifestyle strategy automatically invests members in a growth fund (UK equities) for the period up to 7 years from expected retirement at which stage it introduces a multi-assets retirement fund, and at 3 years out from expected retirement it introduces a cash fund. The lifestyle strategy is designed for investors who have yet to decide how they are going to take their retirement income or who want to take flexible income.

The Plan's Retirement Age is 65 (or 60 for Pilots), though members may specify a different Target Retirement Age. Therefore, for members who select the lifestyle strategy, the phasing outlined above with tie in with the chosen retirement age.

The lifestyle strategy invests in a series of funds from Standard Life, which meet the requirements for social, environmental and ethical considerations set out as an appendix to the Trustee's Statement of Investment Principles ("SIP").

The Trustee expects to deliver growth over the member's lifetime within the Plan without excessive risk taking, with an increased focus in the final seven years of reducing volatility to enable members approaching retirement to make financial plans for the period after retirement. The Trustee considers this approach to be in the best interests of relevant members and relevant beneficiaries.

As noted above, we continually consult with the Company to ensure that that the Plan provides value for members and incorporates a robust governance framework.

We continue to monitor the performance and ongoing strategy of all the lifestyle strategies and the full fund range.

We have drafted a technical appendix to this statement which provides more details of the funds available to DC section members along with illustrations of the impact of fund charges on member outcomes.

Processing Plan transactions

The Trustee has a specific duty to ensure that core financial transactions (including the investment of contributions, transfer of member assets into and out of the Plan, transfers between different investments within the Plan and payments to and in respect of members) relating to the DC section are processed promptly and accurately. These transactions are undertaken on the Trustee's behalf by the Company and its DC administrator and investment manager Standard Life Aberdeen.

The Trustee has reviewed the processes and controls implemented by those organisations and consider them to be suitably designed to achieve these objectives. The Trustee considers that the requirements for processing core financial transactions specified in the Administration Regulations have been met.

The Trustee receives periodic Stewardship reports from Standard Life Aberdeen. The most recent of these covered the Plan to from 1 January 2021 to 31 December 2021. This confirmed that Standard Life Aberdeen are performing ahead of target at 92.1% of transaction being completed within 10 days, versus a target of 90%.

Transaction costs

The Administration Regulations require the Trustee to make an assessment of charges and transactions costs borne by DC section members and the extent to which those charges and costs represent good value for members.

The customised lifestyle strategy (most popular by member choice) attracts a total management charge of 1.00% p.a. of assets under management for all members plus additional expenses of 0.04%, however, this is offset by a negotiated rebate of 0.35% p.a., leading to a total net annual charge of 0.69% p.a. This is lower than the maximum allowed of 0.75% p.a. for default funds used for auto-enrolment purposes and the Trustee is therefore happy that this offers reasonable value for members, however our ongoing review may lead to improved value for members.

The Trustee also makes available a range of alternative funds and lifestyle strategies which may be chosen by members as an alternative to the default arrangement. These funds attract annual charges of between 0.66% and 1.15%, and the level of charges for each fund is set out in the member booklet which is available on request. These funds allow members to take a more tailored approach to managing their own pension investments.

As noted above, all the rates agreed incorporate a discount of 0.35% compared with the equivalent charges made by the same investment manager to retail investors.

We have included a technical appendix to this statement in which we provide some illustrations of the cumulative effect over time of the relevant costs and charges on the value of member's benefits. Our technical appendix has been drafted taking account of statutory guidance as outlined in v4.2 of AS TM1: Statutory Money Purchase Illustrations, dated October 2016. The FRC is currently carrying out a consultation on proposed revisions to AS TM1.

Excerpts of this Statement are available to view here: https://investor.ryanair.com/corporate-governance/

Trustee's knowledge and understanding

Sections 247 and 248 of the Pensions Act 2004 set out the requirement for trustees to have appropriate knowledge and understanding of the law relating to pensions and trusts, the funding of occupational pension Plans, investment of Plan assets and other matters to enable them to exercise their functions as trustees properly. This requirement is underpinned by guidance in the Pension Regulator's Code of Practice 7. The comments in this section relate to the Trustee as a body in dealing with the whole Plan and are not restricted to the DC section.

As a sole corporate entity, the Trustee has in place arrangements for ensuring that he takes responsibility for keeping himself up-to-date with relevant developments and carry out a self-assessment of training needs.

In addition, the Trustee receives advice from professional advisors, and the relevant skills and experience of those advisors is a key criterion when evaluating advisor performance or selecting new advisors.

Specifically, in relation to the Plan, the Trustee ensures that time is set aside periodically to review plan documentation and that there is a Trustee training element at every Trustee meeting, delivered by our professional advisors.

Taking account of actions as a trustee body, and the professional advice available to it, the Trustee considers that it is enabled properly to exercise its functions as Trustee.

DC Plan governance

As Trustee of the Plan I have reviewed and assessed that our systems, processes and controls across key governance functions are consistent with those set out in The Pensions Regulator's:

- Code of Practice 13: Governance and administration of occupational trust-based schemes providing money purchase benefits; and
- Regulatory guidance as applicable to defined contribution plans.

These are underpinned by the DC quality features.

Under the Pensions Regulator Code of Practice 13 ("the DC code"), trustee boards are accountable for the overall quality of a plan's administration and the meeting of all related legal requirements, including where any part of the administration function has been outsourced to an external provider. The Trustee should consider the following areas to ensure compliance with the DC code:

DC Plan governance (continued)

- Administration reporting, training and experience;
- Quality assurance and continuity;
- Disaster recovery and business continuity planning;
- Core financial transactions;
- The accuracy of data control and record-keeping, including the General Data Protection Regulations ("GDPR"); and
- The accuracy of calculations and communications.

Based on our assessment and subject to the explanations set out below we believe that we have adopted the standards of practice set out in the DC code and DC regulatory guidance. These help to demonstrate the presence of DC quality features, which we believe will help deliver better outcomes for members at retirement.

Where we are seeking to achieve 'best practice' level, we explain this below.

1. The Trustee will review and update the DC SIPP to ensure that it remains relevant and up to date;
2. The Trustee will seek to establish a more robust administration monitoring process and actively track KPIs; and
3. The Trustee will review feedback from the Plan auditor and seek to improve core processes where required.

The Trustee maintains an Investment Implementation Policy Document (IIPD) which contains details of the Plan's investment arrangements. Details of the arrangements can be found in the IIPD.

The Statement regarding DC governance was approved by the Trustee and signed on their behalf by Vincent Boyle and Kirstyn Switzer.

Vincent Boyle	**Kirstyn Switzer**
APT Workplace Pensions Limited	**APT Workplace Pensions Limited**
Date:	**Date:**

The Pensions Regulator

The Pensions Regulator is the statutory body that regulates company pension schemes and enforces the law as it relates to them. It has wide-ranging powers, which include the power to:

- suspend, disqualify and remove trustees for consistently failing to carry out their duties;
- wind up schemes where necessary; and
- apply for information to prevent the misuse and misappropriation of scheme assets and apply for restrictions where necessary.

The Scheme's Auditor and the Scheme Actuary for each Section have a statutory duty to make an immediate written report to the Pensions Regulator if they believe that certain legal duties concerned with the administration of the Scheme are not being carried out. The Pensions Regulator can be contacted at:

The Pensions Regulator	Telephone:	0345 600 7060
Napier House	Email:	customersupport@tpr.gov.uk
Trafalgar Place	Website:	www.thepensionsregulator.gov.uk
Brighton		
BN1 4DW		

The Pensions Tracing Service

The Pensions Tracing Service provides a tracing service for members (and their dependants) of previous employers' schemes, who have lost touch with earlier employers and trustee. To trace a benefit entitlement under a former employer's scheme, enquiries should be addressed to:

Pension Tracing Service
The Pension Service 9
Mail Handling Site A
Wolverhampton
WV98 1LU

Telephone: 0800 731 0193
Tracing can be done online at: https://www.gov.uk/find-pension-contact-details

The Pension Protection Fund

The PPF was established to pay compensation to members of eligible Defined Benefit pension schemes, when there is a qualifying insolvency event in relation to the employer and where there are insufficient assets in the pension scheme to cover PPF levels of compensation. The address is:

12 Dingwall Road	Telephone:	0345 600 2541
Croydon	Email:	information@ppf.co.uk
CR0 2NA	Website:	www.ppf.co.uk

The Money and Pensions Service and Pensions Ombudsman

The Pensions Ombudsman deals with complaints and disputes which concern the administration and/or management of occupational and personal pension schemes.

Contact with The Pensions Ombudsman about a complaint needs to be made within three years of when the event(s) happened or, within three years of when the event(s) was first known about it (or ought to have been known about). There is discretion for those time limits to be extended.

The Pensions Ombudsman can be contacted at:

10 South Colonnade	Telephone: 0800 917 4487
Canary Wharf	Email: enquiries@pensions-ombudsman.org.uk
E14 4PU	Website: www.pensions-ombudsman.org.uk

Complaints can also be submitted online. Further information on how to complain about an occupational pension scheme can be seen on this page: www.pensions-ombudsman.org.uk/submit-complaint/

The Money and Pensions Service is a free money guidance and debt advice service launched in January 2019, combining the Money Advice Service, The Pensions Advisory Service and Pension Wise to form a single guidance body.

The Money and Pension Service can be contacted at:

Money and Pension Service	Telephone: 01159 659570
Holborn Centre	Email: contact@maps.org.uk
120 Holborn	Website: www.moneyandpensionsservice.org.uk
London	
EC1N 2TD	

Contacting the Trustee

Members and Trade Unions, recognised for the purposes of collective bargaining in relation to Members, are entitled to inspect copies of documents giving information about the Plan. In some circumstances, copies of the documents can be provided but a charge may be made for copies of the trust documents (Deed and Rules).

Any complaints or enquiries about the Plan, including requests from individuals for information about their benefits, should be addressed to the Trustee of The Ryanair UK Pension Plan, care of:

Deloitte Total Reward and Benefits Limited
Lincoln Building
27 – 45 Great Victoria Street
Belfast
BT2 7SL

Schedule of Contributions

Ryanair UK Pension Plan

Schedule of Contributions for the purposes of Part 3 of the Pensions Act 2004 and Section 9 of the Occupational Pensions Schemes (Scheme Funding) Regulations 2005.

Status

This Schedule of Contributions for the Ryanair UK Pension Plan ("the Plan") has been prepared by the Trustee of the Plan, after obtaining the advice of Gregor Law FFA, the Scheme Actuary. This Schedule of Contributions, put in place for the Plan, supersedes the previous schedule dated 12 September 2017.

The contribution rates and payment dates have been agreed between the Trustee and the Employer, Ryanair Limited.

Contributions to be paid to the Plan for the period from 1 January 2020 to 1 June 2026

Contributions in respect of the funding shortfall in accordance with the recovery plan dated 31 March 2021

Employer contributions:

Between 1 January 2020 and 1 March 2021, the Employer has continued to pay deficit reduction contributions of £452,000 p.a. in line with the previous Schedule of Contributions dated 12 September 2017.

Between 1 March 2021 and 1 June 2026, the Employer agrees to continue to pay deficit reduction contributions in line with those set out in the table below.

	£'000 p.a.
Between 1 March 2021 and 30 June 2021	452,000
Between 1 July 2021 and 1 June 2026	552,000

The above contributions are to be paid to the Plan on a monthly basis. All contributions shall fall due on the last day of each calendar month in respect of that month, and shall be paid by the 19th of the subsequent month.

Contributions in respect of benefit augmentations

The Employer will pay any contributions required to meet any benefit augmentations granted or benefit improvements as agreed with the Scheme Actuary.

Contributions in respect of administration expenses and other costs

Administration expenses and Pension Protection Fund (PPF) (and other) levies payable in respect of the Plan will be paid separately by the Employer.

This Schedule of Contributions has been agreed by the Employer and the Trustee of the Plan:

Signed on behalf of the Employer

Signature:

Name: JOHN TUITE

Position: CFO - FINANCIAL SERVICES, RYANAIR

Date: 31 March 2021

Signed on behalf of the Trustee of the Plan

Signature:

Name: Vincent Boyle

Position: CEO APT Workplace Pensions Ltd

Date: 31 March 2021

Actuary's certification of Schedule of Contributions

Name of Plan: Ryanair UK Pension Plan

Adequacy of rates of contributions

1. I certify that, in my opinion, the rates of contributions shown in this Schedule of Contributions are such that at the valuation date the statutory funding objective can be expected to be met by the end of the period specified in the Recovery Plan dated 31 March 2021 for the Plan.

Adherence to statement of funding principles

2. I hereby certify that, in my opinion, this schedule of contributions is consistent with the Statement of Funding Principles 31 March 2021.

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

Signature		**Date**	31 March 2021
Name	Gregor Law FFA	**Qualification**	Fellow of the Institute and Faculty of Actuaries
Address	Deloitte Total Reward and Benefits Limited Lincoln Building 27-45 Great Victoria Street Belfast BT2 7SL		

Ryanair UK Pension Plan

Payment Schedule effective from 1 July 2021

In accordance with Section 87 of the Pensions Act 1995, the Trustees of the Ryanair UK Pension Plan ("the Plan") certify the Payment Schedule effective from 1 July 2021.

Contributions are payable towards the Plan by or on behalf of Ryanair DAC at the following rates:

Non-Pilots and Employer Matching obligations

Other than voluntary contributions, non-pilot member contributions, and associated employer contributions, are payable towards the Plan on behalf of active members as a percentage of pensionable salary agreed between the Employee and the Employer, subject to the following rates:

Employee Contribution	Core Company Contribution	Matched Contribution	Total Contribution
Nil	2%	Nil	2%
1%	2%	Nil	3%
2%	2%	Nil	4%
3%	2%	1%	6%
4%	2%	2%	8%
5%	2%	3%	10%

Non-pilot member contributions (and employer contributions) are payable on or before the 19th of the month after the month in which the non-pilot member contribution is deducted from salary.

Pilots and Employer Matching obligations

Other than voluntary contributions, pilot member contributions can be paid into the Plan, with employer matching obligations applicable up to the maximum shown in the following table.

Maximum Annual Contribution (for Employer Matching)	
From 1 July 2020 to 30 June 2022	
Captain	£6,400
First Officer	£2,400
From 1 July 2022 to 30 June 2023	
Captain	£6,880
First Officer	£2,580
From 1 July 2023 to 30 June 2024	
Captain	£7,360
First Officer	£2,760
From 1 July 2024 onwards	
Captain	£8,000
First Officer	£3,000

Pilot member contributions (and employer contributions) are payable on or before the 19th of the month after the month in which the pilot member contribution is deducted from salary.

Signed on behalf of the Principal Employer

Signature: SEAN NORTON

Date: 25/4/22

Signed on behalf of the Trustees

Signature:

Date: 25/04/2022

Opinion
We have audited the financial statements of the Ryanair UK Pension Plan (the 'Plan') for the year ended 31 December 2021 comprising the Fund account, the Statement of Net Assets and the related notes, including significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including Financial Reporting Standard 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland' (United Kingdom Generally Accepted Accounting Practice).

In our opinion the financial statements:

- show a true and fair view of the financial transactions of the Plan during the year ended 31 December 2021, and of the amount and disposition at that date of its assets and liabilities, other than liabilities to pay pensions and benefits after the end of the year;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- contain the information specified in Regulation 3A of the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996 as amended by the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) (Amendment) Regulations 2016, made under the Pensions Act 1995.

Basis for opinion
We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditors' responsibilities for the audit of the financial statements section of our report. We are independent of the Plan in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern
In auditing the financial statements, we have concluded that the trustee’s use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the plan’s ability to continue as a going concern for a period of at least 12 months from the date when the financial statements are authorised for issue.

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

Other information
The other information comprises the information included in the annual report, but does not include the financial statements and our Report of the Auditors thereon. The Trustee is responsible for the other information. Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

Other information (continued)
In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Responsibilities of Trustee
As explained more fully in the Statement of Trustee responsibilities set out on page 16, the Trustee is responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the Trustee determines necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

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

Our responsibilities for the audit of the financial statements
Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue a Report of the Auditors that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists.

Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

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

We considered the opportunities and incentives that may exist within the Plan for fraud and identified the greatest potential for fraud in relation to revenue recognition and payment of amounts from the Plan. In common with all audits under ISAs (UK), we are also required to perform specific procedures to respond to the risk of management override.

We also obtained an understanding of the legal and regulatory frameworks that the Plan operates in, focusing on provisions of those laws and regulations that had a direct effect on the determination of material amounts and disclosures in the financial statements. The key laws and regulations we considered in this context included UK Pension legislation and guidance provided by the Pensions Regulator.

Our responsibilities for the audit of the financial statements (continued)
In addition, we considered provisions of relevant laws and regulations that do not have a direct effect on the financial statements but compliance with which may be fundamental to the Pension Plan’s ability to operate or to avoid a material penalty.

Our procedures to respond to risks identified included the following:

- reviewing the financial statement disclosures and testing to supporting documentation to assess compliance with provisions of relevant laws and regulations described as having a direct effect on the financial statements;
- enquiring of management and plan advisors regarding actual and potential litigation and claims;
- performing analytical procedures to identify any unusual or unexpected relationships that may indicate risks of material misstatement due to fraud;
- reading minutes of meetings of those charged with governance and reviewing regulatory correspondence with the Pension Regulator;
- in addressing the risk of fraud through management override of controls we, tested the appropriateness of journal entries and other adjustments; assessed whether the judgements made in making accounting estimates are indicative of a potential bias; evaluated the business rationale of any significant transactions; and where possible obtained direct confirmation of balances independently from the relevant party.

We also communicated relevant identified laws and regulations and potential fraud risks to all engagement team members, and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

Because of the inherent limitations of an audit, there is a risk that we will not detect all irregularities, including those leading to a material misstatement in the financial statements or non-compliance with regulation. This risk increases the more that compliance with a law or regulation is removed from the events and transactions reflected in the financial statements, as we will be less likely to become aware of instances of non-compliance. The risk is also greater regarding irregularities occurring due to fraud rather than error, as fraud involves intentional concealment, forgery, collusion, omission or misrepresentation.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at www.frc.org.uk/auditorsresponsibilities. This description forms part of our Report of the Auditors.

Use of report
This report is made solely to the Plan’s Trustee, as a body, in accordance with regulations made under the Pension Act 1995. Our audit work has been undertaken so that we might state to the Trustees those matters we are required to state to them in a Report of the Auditors and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Plan and the Plan's Trustee as a body, for our audit work, for this report, or for the opinions we have formed.

Baker Tilly Mooney Moore
Statutory Auditor
17 Clarendon Road
Clarendon Dock
Belfast BT1 3BG

Date: ....

The Ryanair UK Pension Plan
Fund Account for the year ended 31 December 2021

	Notes	2021 Final Salary Section £	2021 Money Purchase Section £	2021 Total £	2020 Final Salary Section £	2020 Money Purchase Section £	2020 Total £
Contributions and Benefits							
Contributions	5						
- Employer		502,002	2,104,297	2,606,299	452,004	2,264,508	2,716,512
- Employee		-	2,469,088	2,469,088	-	2,956,949	2,956,949
		502,002	4,573,385	5,075,387	452,004	5,221,457	5,673,461
Transfers in	6	-	112,530	112,530	-	48,723	48,723
Other income	7	-	396,297	396,297	1,800	-	1,800
		502,002	5,082,212	5,584,214	453,804	5,270,180	5,723,984
Benefits paid or payable	8	(178,286)	(459,763)	(638,049)	(176,785)	(219,163)	(395,948)
Payments to and on account of leavers	9	(415,696)	(1,178,121)	(1,593,817)	(134,834)	(1,360,666)	(1,495,500)
Administrative expenses	10	(244)	(219)	(463)	(257)	(237)	(494)
		(594,226)	(1,638,103)	(2,232,329)	(311,876)	(1,580,066)	(1,891,942)
Net (withdrawals)/additions from dealings with members		(92,224)	3,444,109	3,351,885	141,928	3,690,114	3,832,042
Returns on investments							
Change in market value of investments	11	1,155,620	5,588,183	6,743,803	564,793	(303,584)	261,209
Net returns on investments		1,155,620	5,588,183	6,743,803	564,793	(303,584)	261,209
Net increase in the fund during the year		1,063,396	9,032,292	10,095,688	706,721	3,386,530	4,093,251
Net Assets at 1 January		12,648,235	54,520,825	67,169,060	11,941,514	51,134,295	63,075,809
Net Assets at 31 December		13,711,631	63,553,117	77,264,748	12,648,235	54,520,825	67,169,060

The notes on pages 32 to 43 form an integral part of these financial statement.

The Ryanair UK Pension Plan
Statement of net assets (available for benefits) as at 31 December 2021

	Note	2021 Final Salary Section £	2021 Money Purchase Section £	2021 Total £	2020 Final Salary Section £	2020 Money Purchase Section £	2020 Total £
Investment Assets	11						
- Pooled investment vehicles		12,819,651	54,170,956	66,990,607	11,676,968	46,751,216	58,428,184
- AVCs		120,394	8,911,612	9,032,006	107,457	7,741,710	7,849,167
		12,940,045	63,082,568	76,022,613	11,784,425	54,492,926	66,277,351
Current Assets	14	817,586	869,956	1,687,542	947,477	33,009	980,486
Current Liabilities	15	(46,000)	(399,407)	(445,407)	(83,667)	(5,110)	(88,777)
Net Assets (available for benefits)		13,711,631	63,553,117	77,264,748	12,648,235	54,520,825	67,169,060

The accompanying notes on pages 32 to 43 form an integral part of these financial statements.

The Financial Statements summarise transactions of the Plan and deal with the net assets at the disposal of the Trustee. They do not take account of the future liability to pay pensions and other benefits. Actuarial valuations of the Plan which do take account of such liabilities are carried out triennially. The latest published valuation was carried out as at 1 January 2020 and statements arising from that valuation can be found on pages 9 and 10. These Financial Statements should be read in conjunction with those statements.

The Financial Statements on pages 30 to 43 were approved by the Trustee and authorised for issue on:

Vincent Boyle, Trustee Director
APT Workplace Pensions Limited
Date:

Kirstyn Switzer, Trustee Director
APT Workplace Pensions Limited
Date:

1. Basis of preparation

The Financial Statements have been prepared in accordance with the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) Regulations 1996, as amended by the Occupational Pension Schemes (Requirement to obtain Audited Accounts and a Statement from the Auditor) (Amendment) Regulations 2016, Financial Reporting Standard 102 – The Financial Reporting Standard applicable in the UK and Republic of Ireland issued by the Financial Reporting Council and the guidance set out in the Statement of Recommended Practice, "Financial Reports of Pension Schemes" (SORP 2018), published by the Pensions Research Accountants Group.

2. Identification of the Financial Statements

The Plan is established as a trust under English law. The address for enquiries to the Plan is included in the Trustee and Advisors section on page 3.

3. Coronavirus (COVID-19) and the Trustee's consideration of going concern

This report and the accompanying financial statements relate to a period during the COVID-19 pandemic and the ensuing health and financial crisis. The Trustee has monitored the impact on Plan's funding, investments and employer covenant, and is following advice from The Pensions Regulator and duly appointed Plan's advisers. Since the date of the last triennial funding valuation as at 1 January 2020, the deficit has decreased. The key reasons for the improvement in the funding position are deficit contributions paid by the Employer and strong investment performance, partially offset by changes in financial conditions over the period.

4. Accounting policies

The Financial Statements have been prepared on an accruals basis.

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

a) Inclusion of income and expenditure

i. *Contributions*

Members' normal and AVCs are accounted for as and when they are deducted from the related salary.

Employers' normal contributions in respect of the Final Salary Section are accounted for in accordance with the Schedule of Contributions. Contributions in respect of the Money Purchase Section are accounted for in accordance with the rules of the Plan.

Employers' deficit funding contributions are accounted for on the due dates set out in the Schedule of Contributions.

ii. *Investment income*

Income from pooled investment vehicles is reinvested by the investment manager for the benefit of the unit holders and is reflected in the unit prices.

4. Accounting policies (continued)

iii. *Benefits*
Benefits are accounted for in the period in which the member notifies the Trustee of their decision on the type or amount of benefit to be taken, or if there is no member choice, on the date of retirement or leaving.

iv. *Transfer values*
Individual transfer values are accounted for when the payment of the transfer value is made.

v. *Administrative expenses*
Administrative expenses are accounted for on an accruals basis.

b) Valuation of investments

Unitised pooled investment vehicles have been valued at the latest available bid price or single price provided by the pooled investment manager. Shares in other pooled arrangements have been valued at the latest available net asset value (NAV), determined in accordance with fair value principles, provided by the pooled investment manager.

5. Contributions receivable

	2021 Final Salary Section £	2021 Money Purchase Section £	2021 Total £	2020 Final Salary Section £	2020 Money Purchase Section £	2020 Total £
Employer:						
Normal	-	2,104,297	2,104,297	-	2,264,508	2,264,508
Deficit funding	502,002	-	502,002	452,004	-	452,004
	502,002	2,104,297	2,606,299	452,004	2,264,508	2,716,512
Employee:						
Normal	-	2,095,738	2,095,738	-	2,263,574	2,263,574
AVCs	-	373,350	373,350	-	693,375	693,375
	-	2,469,088	2,469,088	-	2,956,949	2,956,949
	502,002	4,573,385	5,075,387	452,004	5,221,457	5,673,461

An actuarial valuation was carried out as at 1 January 2017 and a Schedule of Contributions certified on 12 September 2017. Under the terms of this schedule, the Principal Employer is required to pay deficit funding contributions of £452,000 per annum.

A further actuarial valuation was carried out as at 1 January 2020 and a Schedule of Contributions certified on 31 March 2021. Under the terms of this schedule, the Principal Employer is required to pay deficit funding contributions of £452,000 per annum until 30 June 2021, and from 1 July 2021 the Principal Employer is required to pay deficit funding contributions of £552,000 per annum until 30 June 2026.

5. Contributions receivable (continued)

During the year, Final Salary section contributions for August 2021 were received later than the date set out in the Schedule of Contributions. This is referred to more fully in the Summary of Contributions on page 46.

6. Transfers in

	2021 Final Salary Section £	2021 Money Purchase Section £	2021 Total £	2020 Final Salary Section £	2020 Money Purchase Section £	2020 Total £
Individual transfers in from other schemes	-	112,530	112,530	-	48,723	48,723
	-	112,530	112,530	-	48,723	48,723

7. Other income

	2021 Final Salary Section £	2021 Money Purchase Section £	2021 Total £	2020 Final Salary Section £	2020 Money Purchase Section £	2020 Total £
Death in service claim	-	396,297	396,297	-	-	-
Other income	-	-	-	-	1,800	1,800
	-	396,297	396,297	-	1,800	1,800

8. Benefits paid or payable

	2021 Final Salary Section £	2021 Money Purchase Section £	2021 Total £	2020 Final Salary Section £	2020 Money Purchase Section £	2020 Total £
Pensions	133,648	-	133,648	128,905	-	128,905
Commutations and lump sums retirement benefits	44,638	64,466	109,104	47,880	219,163	267,043
Lump sum on death in service	-	395,297	395,297	-	-	-
	178,286	459,763	638,049	176,785	219,163	395,948

9. Payments in respect of leavers

	2021 Final Salary Section £	2021 Money Purchase Section £	2021 Total £	2020 Final Salary Section £	2020 Money Purchase Section £	2020 Total £
Individual transfers to other schemes	415,696	1,178,121	1,593,817	134,834	1,360,666	1,495,500
	415,696	1,178,121	1,593,817	134,834	1,360,666	1,495,500

10. Administrative expenses

	2021 Final Salary Section £	2021 Money Purchase Section £	2021 Total £	2020 Final Salary Section £	2020 Money Purchase Section £	2020 Total £
Bank charges	244	219	463	257	237	494
	244	219	463	257	237	494

11. Investments

	Value at 31 December 2020 £	Purchases at cost £	Sales proceeds £	Change in Market Value £	Value at 31 December 2021 £
Final Salary section					
Pooled investment vehicles	11,676,968	-	-	1,142,683	12,819,651
AVC investments	107,457	-	-	12,937	120,394
	11,784,425	-	-	1,155,620	12,940,045
Money Purchase section					
Pooled investment vehicles	46,751,216	3,904,879	(1,241,398)	4,756,259	54,170,956
AVC investments	7,741,710	339,167	(1,189)	831,924	8,911,612
	54,492,926	4,244,046	(1,242,587)	5,588,183	63,082,568

11. Investments (continued)

At the year end, the following holdings constituted more than 5% of the net assets of the Plan:

Standard Life Assurance Limited	2021 Market Value	%	*2020 Market Value*	*%*
Final Salary – Corporate Managed Fund	**12,819,651**	**16.6**	11,676,968	17.4
Money Purchase – UK Equity Pension Fund	**20,608,926**	**26.7**	18,270,865	27.2
Money Purchase – Managed Pension Fund	**16,579,333**	**21.5**	14,794,214	22.0
Money Purchase – Stock Exchange Pension Fund	**8,260,769**	**10.7**	7,383,707	11.0
Money Purchase – At Retirement (Multi Asset Univ) Pension Fund	**5,432,575**	**7.0**	4,384,614	6.5

All investments are held with UK based investment managers.

Costs are borne by the Plan in relation to transactions in pooled investment vehicles. However, such costs are taken into account in calculating the bid/offer spread of these investments and are not therefore separately identifiable.

The change in market value of investments during the year comprises all increases and decreases in the market value of investments held at any time during the year, including profits and losses realised on sales of investments during the year

AVC Investments

The Trustee holds assets invested separately from the main Plan in Utmost Life and Pensions for the Final Salary section and within the main Plan for the Money Purchase section in Standard Life Assurance Limited securing additional benefits for those members electing to pay AVCs. Members participating in this arrangement will receive an annual statement up to 31 December confirming the amounts held to their account and the movements in the year.

	2021 £	*2020 £*
Final Salary AVC investments		
Utmost Life and Pensions	**120,394**	107,457
Money Purchase AVC investments		
Standard Life	**8,911,612**	7,741,710
Total AVCs	**9,032,006**	7,849,167

12. Fair value of investments

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

Level 1 The quoted price for an identical asset in an active market at the reporting date.

Level 2 Where a quoted price is not available and recent transactions of an identical asset on their own are not a good estimate of fair value, the fair value is determined by using a valuation technique that uses observable market data.

Level 3 Where a quoted price is not available and recent transactions of an identical asset on their own are not a good estimate of fair value, the fair value is determined by using a valuation technique that uses non-observable data.

12. Fair value of investments (continued)

The Plan's investment assets and liabilities have been included at fair value using the above hierarchy categories as follows:

Final Salary Section

	At 31 December 2021			
	Level 1 £	**Level 2 £**	**Level 3 £**	**Total £**
Pooled investment vehicles	-	12,819,651	-	**12,819,651**
AVC investments	-	114,760	5,634	**120,394**
	-	**12,934,411**	**5,634**	**12,940,045**

Analysis for the prior year end is as follows:

	At 31 December 2020			
	Level 1 £	**Level 2 £**	**Level 3 £**	**Total £**
Pooled investment vehicles	-	11,676,968	-	**11,676,968**
AVC investments	-	102,204	5,253	**107,457**
	-	**11,779,172**	**5,253**	**11,784,425**

The fair value for the AVCs as at 31 December 2020 has been reclassified to show the split between level 2 and level 3 in relation to unitised funds and with-profit policies respectively.

Money Purchase Section

	At 31 December 2021			
	Level 1 £	**Level 2 £**	**Level 3 £**	**Total £**
Pooled investment vehicles	-	54,170,956	-	**54,170,956**
AVC investments	-	8,911,612	-	**8,911,612**
	-	**63,082,568**	**-**	**63,082,568**

Analysis for the prior year end is as follows:

	At 31 December 2020			
	Level 1 £	**Level 2 £**	**Level 3 £**	**Total £**
Pooled investment vehicles	-	46,751,216	-	**46,751,216**
AVC investments	-	7,741,710	-	**7,741,710**
	-	**54,492,926**	**-**	**54,492,926**

13. Investment Risks

FRS 102 requires disclosure of information that allows users of financial statements to understand the nature and extent of credit risk and market risk emanating from the assets in which the Plan invests. Under FRS 102, credit risk and market risk are defined as follows:

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

Market risk: 'The risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk comprises three types of risk: currency risk, interest rate risk and other price risk.

- Interest rate risk – the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates.

- Currency risk – the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in foreign exchange rates.

- Other price risk – the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices (other than those arising from interest rate risk or currency risk), whether those changes are caused by factors specific to the financial instrument or its issuer, or factors affecting all similar financial instruments traded in the market.

The Trustee has set its investment strategy with reference to its investment objectives as set out below, having taken advice from the Plan's professional investment advisor. Risk is inherent to all investment strategies and the Trustee considers a number of risks when setting the Plan's investment strategy, including credit risk and market risk as defined under FRS 102, as well as other risks including those emanating from the Plan's liabilities and the strength of the Plan's sponsor covenant. The Trustee, in the design and implementation of the investment strategy, has sought to manage these key risks and monitor the investment strategy and associated risks on a regular basis.

An overview of the Plans investment strategy and approach to risk management is set out below. To clarify, all statements relating to risk management exclude the Plan's AVC investments.

Final Salary Section

Broad investment strategy

The Plan's Final Salary assets are invested in the Standard Life Managed Pension Fund, managed by Standard Life Assurance Limited. The Standard Life Managed Pension Fund invests in a variety of different asset classes. It is predominantly invested in UK and overseas equities (c. 78% as at 31 December 2021) with the remainder of the Fund invested in global bonds (c. 11%), property (c. 1%), derivatives (<0.1%) and cash-like instruments (c. 10%).

13. Investment Risks (continued)

Market risk summary

Below is a summary of the Plan's market risk exposures and how the Trustee seeks to manage these risks:

Interest rate risk

The Plan's Final Salary assets are exposed to interest rate risk through its investment in the Standard Life Managed Pension Fund which invests in UK and overseas bonds (c. 11% as at 31 December 2021). While the market value of these assets is sensitive to changes in interest rates, this sensitivity will offset to some extent the Plan's liability exposure to interest rates.

Furthermore, the income earned from any cash allocations (c. 10% of Defined Benefit assets) within the Plan's pooled fund holdings will also be sensitive to interest rate changes.

Currency risk

The Plan's Final Salary assets are subject to currency risk because the Standard Life Managed Pension Fund holds an allocation to overseas equities and fixed interest securities (c. 53% as at 31 December 2021) and global bonds, of which a proportion will be denominated in non-GBP currencies (c. 11% as at 31 December 2021). Standard Life Assurance Limited manages this risk by investing the Fund in a diversified range of assets across various regional markets. The Trustee is comfortable with this risk and has delegated currency risk management within the Fund to Standard Life Assurance Limited.

Other price risk

The Plan's Final Salary assets are exposed to changes in equity and property prices through the investment in the Standard Life Managed Pension Fund. Other price risk arises mainly from the Fund's allocation to equities which amounts to c. 78% of the Fund as at 31 December 2021. Standard Life Assurance Limited manages this exposure by investing the Fund in a diverse portfolio of stocks across various regional markets.

Exposure to property markets is limited by the size of the Fund's allocation to the asset class (c. 1% as at 31 December 2021).

Credit risk summary

The Plan invests in pooled investment vehicles and is therefore exposed to direct credit risk. This direct credit risk is mitigated by the regulatory environments in which the investment manager operates and the fact that underlying assets within these pooled funds are ring-fenced from the investment manager.

13. Investment Risks (continued)

A summary of the pooled investment vehicles by type of arrangement that the Plan holds is as follows:

	31 Dec 2020	31 Dec 2021
Unit linked life insurance contracts	11,677	12,820
Total Investments	11,677	12,820

The Plan holds a unit-linked insurance policy issued by Standard Life Assurance Limited, the value of which is based on units held in an underlying pooled fund. The Plan is exposed to the direct credit risk associated with this insurance policy and indirect credit risk through the underlying bond and cash assets held by the Standard Life Managed Pension Fund.

Insurance policy
Direct credit risk to Standard Life Assurance Limited is mitigated by Standard Life's Solvency Capital Requirements and the regulatory oversight of the Prudential Regulation Authority. In addition, the Trustee undertook due diligence prior to investing in the Standard Life Managed Pension Fund, taking advice from their investment advisor and legal advisor where relevant.

Bond holdings

The Plan is exposed to credit risk arising from the bonds underlying the Standard Life Managed Pension Fund. The Managed Fund consists of corporate bonds and government bonds. All of which will provide an element of credit risk. Credit risk arising from any gilts and index-linked gilts will be minimal given the UK Government is the counterparty. Credit risk elsewhere is controlled through diversification of different issuers.

Cash Holdings

The Plan is also exposed to indirect credit risk through the underlying cash holdings of the Standard Life Managed Pension Fund (c. 10% as at 31 December 2021). Standard Life Assurance Limited manages this risk by ensuring money is placed on deposit with counterparties that meet the Fund's minimum credit rating.

Money Purchase Section

Fund Range

The investment funds offered to Money Purchase members are provided by Standard Life Assurance Limited. As at 31 December 2021, members were invested across 70 funds managed by Abrdn, Pension 2, BlackRock, Fidelity, Schroders, Janus Henderson, Invesco, Jupiter, Liontrust, Vanguard, 7im, UBS, M&G, BNY Mellon, Ishares, Standard Life, Baillie Gifford, HSBC, Ninety One, Threadneedle and BMO. The Money Purchase fund range covers all of the primary asset classes including UK and overseas equities, bonds, property, cash and balanced funds. The Trustee has ensured that members have a wide variety of funds to choose from, which caters for different levels of risk appetite.

13. Investment Risks (continued)

The majority (c. 72% as at 31 December 2021) of Money Purchase money is invested in three funds; the Standard Life Managed Pension Fund (c. £14.2m), the Standard Life UK Equity Pension Fund (c. £17.8m) and the Standard Life Stock Exchange Pension Fund (c. £6.9m). The investment risks as summarised below are described at the total Plan level in respect of these three funds. Member level risk exposures will depend on the funds invested in by individual members and the weightings of those funds.

Market risk summary

Interest rate risk

The Plan is subject interest rate risk through its investment in the Standard Life Managed Pension Fund (c. £14.2m as at 31 December 2021) which invests in UK and overseas fixed interest securities.

Currency risk

The Plan is subject to currency risk because both the Standard Life Stock Exchange Pension Fund and the Standard Life Managed Pension Fund hold a majority allocation to overseas equities (c. 70% and c. 45% as at 31 December 2021 respectively), with the Standard Life Managed Pension Fund also holding overseas fixed-interest securities within its global fixed-interest securities allocation (c. 12% as at 31 December 2021). Standard Life Assurance Limited manages this risk by investing the Fund in a diversified range of assets across various overseas regional markets. The Trustee is comfortable with this risk and has delegated currency risk management within the Fund to Standard Life Assurance Limited.

Other price risk

The Plan's Money Purchase section is subject to equity price risk through the Standard Life Managed Pension Fund, Standard Life UK Equity Pension Fund and Standard Life Stock Exchange Pension Fund. Standard Life Investments manages this exposure by investing the Funds in a diverse portfolio of UK listed and globally listed stocks respectively.

Credit risk summary

The Plan's Money Purchase Section is subject to direct credit risk in relation to the unit-linked insurance policy issued by Standard Life Assurance Limited. This risk is mitigated in the same way as for the Defined Benefit section as described above.

Bond holdings

The Plan is exposed to indirect credit risk across its fund range, including through the Standard Life Managed Pension Fund, to the extent that there are underlying gilt, index-linked gilt and corporate bond holdings. Credit risk arising from the gilt and index-linked gilt investments is minimal given the counterparty is the UK Government.

13. Investment Risks (continued)

Credit risk arising from the underlying corporate bonds across the pooled funds is mitigated by investing in corporate bonds which are well diversified and typically of investment grade rating.

Cash holdings

The Plan is also exposed to indirect credit risk across its fund range to the extent that there are underlying cash holdings.

Pooled fund holdings

This direct credit risk is mitigated by the fact that underlying assets within these pooled funds are ring-fenced from the investment manager and the regulatory environment in which the investment manager operates. In addition, the Trustee carries out due diligence prior to selecting a pooled fund for inclusion within the fund range, taking advice from their investment advisory and legal advisor where relevant.

14. Current Assets

	2021			2020		
	Final Salary Section £	Money Purchase Section £	Total £	Final Salary Section £	Money Purchase Section £	Total £
Employer contributions receivable	-	204,243	204,243	-	400	400
Employee contributions receivable	-	238,426	238,426	-	400	400
Death in service income receivable	-	90,157	90,157	-	-	-
Pensions paid in advance	11,051	-	11,051	9,998	-	9,998
Cash balances	806,535	337,130	1,143,665	937,479	32,209	969,688
	817,586	869,956	1,687,542	947,477	33,009	980,486

15. Current Liabilities

	2021 Final Salary Section £	2021 Money Purchase Section £	2021 Total £	2020 Final Salary Section £	2020 Money Purchase Section £	2020 Total £
Refunds due to leavers	-	4,110	4,110	-	5,110	5,110
Benefits payable	-	395,297	395,297	-	-	-
Cashflow repayable	46,000	-	46,000	46,000	-	46,000
Employer deficit funding contributions	-	-	-	37,667	-	37,667
	46,000	399,407	445,407	83,667	5,110	88,777

16. Contingent Liabilities

These Financial Statements do not take account of liabilities to pay pensions and other benefits in the future. On this basis, in the opinion of the Trustee, the Plan had no contingent liabilities at the year end.

17. Related Party Investments

The Principal Employer arranges secretarial and certain administration services to the Trustee and bears these costs. The costs borne by the Principal Employer in relation to the Plan are not reflected in these Financial Statements. All of the above transactions were made in accordance with the Plan Rules.

18. Subsequent Events

There were no material subsequent events requiring disclosure in financial statements for the year ended 31 December 2021.

19. Taxation status

The Plan is a registered pension scheme under Chapter 2 of Part 4 of the Finance Act 2004.

Independent Auditors' Statement about Contributions to the Trustee of The Ryanair UK Pension Plan

We have examined the summary of contributions to the Ryanair UK Pension Plan on page 46, in respect of the Plan year ended 31 December 2021.

This statement is made solely to the Plan's Trustee, as a body, in accordance with the Pensions Act 1995 and the Regulations made there under. Our work has been undertaken so that we might state to the Plan's Trustee those matters we are required to state to them in an auditor's statement about contributions and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other that the Plan's Trustee, as a body, for our work, for this statement, or for the opinions we have formed.

Qualified statement about contributions payable under the schedule of contributions

In our opinion, except for the effects of the departure from the schedule of contributions, contributions for the scheme year ended 31 December 2021 as reported in the summary of contributions and payable under the schedule of contributions have in all material respects been paid at least in accordance with:

- the schedule of contributions certified by the actuary on 12 September 2017 for the Period 1 January 2021 to 31 March 2021, the contribution schedule as certified on 31 March 2021 for the period 1 April 2021 to 31 December 2021; and

- For the Defined Contribution section, the payment schedule, signed on 9 October 2020 for the period 1 January 2021 to 30 June 2021 and the Payment schedule signed on 25 April 2002 for the period 1 July 2021 to 31 December 2021.

Basis for qualified statement about contributions

As explained on page 46 contributions for one 1 month (August) totalling £46,000 relating to the Final Salary Section were paid 16 days later than the due date set out in the schedule of contributions.

Scope of work on Statement about Contributions

Our examination involves obtaining evidence sufficient to give reasonable assurance that contributions reported in the attached summary of contributions have in all material respects been paid at least in accordance with the Schedules of Contributions, in relation to the Defined Benefit section, and the Payment Schedules, in relation to the Defined Contribution section.

This includes an examination, on a test basis, of evidence relevant to the amounts of contributions payable to the Plan and the timing of those payments under the Schedules of Contributions, in relation to the Defined Benefit section, and the Payment Schedules, in relation to the Defined Contribution section.

Respective responsibilities of Trustee and Auditors

As explained more fully in the Statement of Trustee Responsibilities, the Plan's Trustee is responsible for preparing, and from time to time reviewing and if necessary revising, a Schedule of Contributions for the Defined Benefit section, and for securing that a Payment Schedule is prepared, maintained and from time to time revised and for monitoring whether contributions are made to the Plan by the employer in accordance with the Schedule of Contributions, in relation to the Defined Benefit section, and the Payment Schedules and Plan rules, in relation to the Defined Contribution section.

It is our responsibility to provide a Statement about Contributions paid under the Schedule of Contributions in place, in relation to the Defined Benefit section, and the Payment Schedules in place, regarding the Defined Contribution section, and to report our opinion to you.

Baker Tilly Mooney Moore
Chartered Certified Accountants
Registered Auditor
17 Clarendon Road
Clarendon Dock
Belfast BT1 3BG

Date:

The Ryanair UK Pension Plan
Summary of Contributions

The contributions paid to the Plan during the year were as follows:

	Final Salary Section £	Money Purchase Section £	Total £
Contributions payable under the Schedules of Contribution (Final Salary Section) and payable under the Payment Schedule (Money Purchase Section)			
Contributions from Employer:			
Normal	-	2,104,297	2,104,297
Deficit funding	502,002	-	502,002
	502,002	2,104,297	2,606,299
Members			
Normal	-	2,095,738	2,095,738
	502,002	4,200,035	4,702,037
Contributions paid not included on the Schedules of Contributions (Final Salary Section) or payable under the Rules of the Plan (Money Purchase Section)			
Members			
Additional Voluntary	-	373,350	373,350
Contributions receivable per Fund Account	**502,002**	**4,573,385**	**5,075,387**

During the year, August 2021 Final Salary Section contributions totaling £46,000 were received 16 days later than the date set out in the Schedule of Contributions. The remainder of the Final Salary Section contributions were paid by the due dates set out in the Schedule of Contributions.

The Money Purchase Section contributions were paid in accordance with the Payment Schedule.

On behalf of the Trustee:

Vincent Boyle, Trustee Director
APT Workplace Pensions Limited
Date:

Kirstyn Switzer, Trustee Director
APT Workplace Pensions Limited
Date:

The Ryanair UK Pension Plan – DC & DB Sections

Implementation Statement

For the year ending 31 December 2021

Introduction

This Implementation Statement (the "Statement") has been prepared by the Trustee of The Ryanair UK Pension Plan, on behalf of the members of the Defined Contribution Section and Defined Benefits Section of The Ryanair UK Pension Plan (the "Plan"), with input from their Investment Consultants, to demonstrate how the Trustee has acted on the policies within their Statement of Investment Principles ("SIP").

Each year, the Trustee must produce an Implementation Statement that demonstrates how they have followed certain policies within their SIP over the Plan year. This Implementation Statement covers the Plan year from 1 January 2021 to 31 December 2021.

This Implementation Statement has been prepared in accordance with the Occupational Pension Schemes (Investment and Disclosure) Regulations 2005 Amendments and is in respect of both the Defined Contribution ("DC") and Defined Benefits ("DB") investments held by the Plan.

Please note that the Plan's SIP is reference to the Plan's DC investments only as due to the size of the DB Plan there is no requirement to produce a SIP, however the Trustees of the Ryanair UK Pension Plan are currently working to put together a SIP for the DB side despite the lack of regulatory requirement. Whilst this is still being produced, the DB section below is shown with respect to the principles set out in the existing SIP.

Trustees of pension schemes are required to provide details of how, and the extent to which, their SIP policies on engagement with investee companies have been followed over the year, including a description of their voting behaviour, the most significant votes cast and any use of a proxy voter on their behalf over the year.

This implementation statement should be read in conjunction with the Plan's SIP covering the year under review, which gives details of the Plan's investment policies along with details of the Plan's governance structure and objectives.

DC Section

The Plan invests in over 70 Self-Select pooled funds all of which are managed by Standard Life Assurance Company (the "Investment Manager"). The top five Self-Select funds (by valuation as at 31 December 2021) are as follows:

- Standard Life UK Equity Pension Fund (c. £18.3m)
- Standard Life Managed Pension Fund (c. £14.8m)
- Standard Life Stock Exchange Pension Fund (c. £7.4m)
- Standard Life At Retirement (Multi-Asset Universal) Pension Fund (Formerly Annuity Purchase Fund) (c. £4.4m)
- Standard Life Multi-Asset Managed (20%-60% Shared) Pension Fund (c. £2.7m)

How the SIP policies were followed over the year

In the opinion of the Trustee, the SIP has been followed throughout the year for the DC Section of The Ryanair UK Pension Plan.

SIP Policies

The Plan's SIP includes policies on the Investment Manager's arrangements, in particular:

The Trustee's policies on investment objectives and risk (Section 2.1 and 2.2 of the SIP, respectively)

Under the DC Section, the Trustee's primary investment objectives are:

Policy	Assessment
To offer an appropriate range of alternative self-select investment options for members that wish to make their own investment choices, recognising that members may have different needs and objectives.	An appropriate range of alternative self-select investment options is offered for members that wish to make their own investment choices.
To achieve good member outcomes net of fees and subject to an acceptable level of risk.	Members are responsible for their own choice of investment options. The self-select offering includes a range of passive low-cost index tracker funds.
That the expected volatility of the returns achieved is managed through appropriate diversification of asset types in order to control the level of volatility and risk in the value of members' pension pots.	The self-select offering includes a range of passive low-cost index tracker funds across multiple asset classes sufficient to put together a well-diversified investment portfolio.
Members are responsible for their own choice of investment options. The accumulated value of a member's pension at retirement can: • *Be used to purchase an annuity from an insurance company; or* • *Remain invested offering members scope to withdraw funds as and when they choose (this is known as a flexible income or income drawdown); or* • *Be withdrawn in total or part upon retirement (although there will be a tax charge on anything above the 25% tax-free limit); or* • *Be utilised across a combination of some or all of the above.*	There are appropriate options within the self-select offering for members who wish to follow each of the available options at retirement.

Risk in a DC scheme lies with the members themselves. In determining suitable investment choices to members, the Trustee has considered a number of risks, including inflation risk, retirement income risk, investment manager risk, conversion risk and custody risk.

The Trustee's policies on day-to-day management of the assets (Section 3 of the SIP)

Policy	Assessment
Main Assets *The assets of the Plan's DC Section will be managed by its Platform Provider, Standard Life Assurance Company ("Standard Life").* *The Platform Provider may invest in underlying funds run by other investment managers, who are responsible for the management of the underlying funds. The investment managers are responsible for stock selection and the exercise of voting rights.*	The Trustee is satisfied with the day-to-day discretionary management of assets by the asset manager, Standard Life, over the year.
Investment Diversification *The Trustee is satisfied that the Platform Provider has a range of funds available to cover broad range of asset classes that suit the individual needs.* *The Trustee is satisfied that the spread of assets and the Investment Manager's policies on investing in individual securities broadly provides adequate diversification of investments.*	The Trustee is satisfied that the policy on investment diversification was followed over the year.
Investment options *The Platform Provider has made available a range of funds to suit the individual needs of the Plan's members. For example, equity funds are available for those members willing to accept a greater level of volatility in pursuit of higher expected retirement savings. Bond and cash funds are offered for those members who are less comfortable with the likely greater volatility of the equity funds.* *There is no default investment arrangement for members who do not actively make their investment choices. Each member must choose how any contributions they make (or which are made on their behalf) are to be invested. The Plan's Retirement Age is 65, although members may specify a different Target Retirement Age.* *The Trustee currently offers one customised lifestyle strategy. This lifestyle strategy automatically invests members in a growth fund (UK equities) for the period up to 7 years from expected retirement at which stage it introduces a multi-assets retirement fund, and at 3 years out from expected retirement it introduces a cash fund. The lifestyle strategy is designed for investors who have yet to decide how they are going to take their retirement income or who want to take flexible income.* *The Trustee maintains an Investment Implementation Policy Document (IIPD) which contains details of the Plan's investment arrangements. Details of the arrangements can be found in the IIPD.*	The Trustee is satisfied that the options available to members satisfy the conditions in the SIP.
Expected Return *The Trustee expects the long-term return of the investment options that invest predominantly in equities and other growth assets to exceed i) price inflation ii) general salary growth and iii) long term returns on bonds and cash.* *The investment options which invest predominantly in bonds and lower risk assets are expected to provide returns above cash and/or in line with bonds, but their primary purpose is to lower the volatility of returns experienced and to preserve capital value.*	The Trustee is satisfied that the policies on long term expected returns over the year were appropriate.

The Trustee continues to monitor the suitability of the self-select range and alongside the investment consultant, continues to monitor the Investment Manager's actions and performance.

The Trustee's policies on ESG considerations and stewardship (Section 4 of the SIP)

The Trustee has set an appropriate monitoring framework to ensure the Plan's investment manager is regularly reviewed. This is to promote greater transparency in understanding the reasons behind performance trends and key risk exposures, and engagement activity and compliance with the Trustee's stated ESG policy. Regular monitoring, with specific reference to ESG factors should incentivise the Plan's investment manager to assess and improve the medium to long-term performance of investee companies, both financial and non-financial.

The Trustee's policies on manager arrangements and the Platform Provider (Section 5 of the SIP)

Members' pension pots in the DC Section are invested entirely in pooled investment funds alongside other investors, and the Trustee does not therefore directly invest in underlying companies or have the ability to engage directly with these companies.

The DC Section offers options for investment to members which include exposure to shares. The Trustee does not directly exercise voting rights as these investments are through pooled funds with many other investors. Voting rights are exercised by Standard Life and Standard Life disclose their voting records publicly on their website, including summaries of their positions for significant shareholder votes. Standard Life apply a consistent voting policy across shares held through pooled funds.

Further detail on the approach taken by Standard Life to exercise voting rights is set out below.

Description of voting behaviour

The top five Self-Select funds (by valuation as at 31 December 2021) where underlying assets included publicly listed equities are as follows:

- Standard Life UK Equity Pension Fund
- Standard Life Managed Pension Fund
- Standard Life Stock Exchange Pension Fund
- Standard Life At Retirement (Multi-Asset Universal) Pension Fund (Formerly Annuity Purchase Fund)
- Standard Life Multi-Asset Managed (20%-60% Shared) Pension Fund

We have obtained voting information from the Investment Manager on the top five Self-Select funds (by valuation as at 31 December 2021). The Investment Manager's voting behaviour over the Plan year for these funds is summarised below. Please note totals may not tie to 100% due to rounding.

The following table shows Standard Life's voting summary covering the Plan's investment in the Standard Life UK Equity Pension Fund:

Standard Life UK Equity Pension Fund	1 January 2021 – 31 December 2021
Number of resolutions Standard Life was eligible to vote on over the year	2,638
Of the eligible resolutions, percentage that Standard Life voted on.	99.0%
Of the resolutions voted, percentage that Standard Life voted **with** management.	98.4%
Of the resolutions voted, percentage that Standard Life voted **against** management.	1.6%
Of the resolutions voted, percentage where Standard Life **abstained**.	0.1%
Of the resolutions voted, percentage where Standard Life voted against the proxy adviser's recommendation.	3.1%

The following table shows Standard Life's voting summary covering the Plan's investment in the Standard Life Managed Pension Fund:

Standard Life Managed Pension Fund	1 January 2021 – 31 December 2021
Number of resolutions Standard Life was eligible to vote on over the year	7,350
Of the eligible resolutions, percentage that Standard Life voted on.	92.8%
Of the resolutions voted, percentage that Standard Life voted **with** management.	92.9%
Of the resolutions voted, percentage that Standard Life voted **against** management.	6.1%
Of the resolutions voted, percentage where Standard Life **abstained**.	1.0%
Of the resolutions voted, percentage where Standard Life voted against the proxy adviser's recommendation.	5.0%

The following table shows Standard Life's voting summary covering the Plan's investment in the Standard Life Stock Exchange Pension Fund:

Standard Life Stock Exchange Pension Fund	1 January 2021 – 31 December 2021
Number of resolutions Standard Life was eligible to vote on over the year	6,763
Of the eligible resolutions, percentage that Standard Life voted on.	92.1%
Of the resolutions voted, percentage that Standard Life voted **with** management.	93.0%
Of the resolutions voted, percentage that Standard Life voted **against** management.	5.9%
Of the resolutions voted, percentage where Standard Life **abstained**.	1.1%
Of the resolutions voted, percentage where Standard Life voted against the proxy adviser's recommendation.	5.2%

The following table shows Standard Life's voting summary covering the Plan's investment in the Standard Life At Retirement (Multi-Asset Universal) Pension Fund:

Standard Life At Retirement (Multi-Asset Universal) Pension Fund	1 January 2021 – 31 December 2021
Number of resolutions Standard Life was eligible to vote on over the year	10,455
Of the eligible resolutions, percentage that Standard Life voted on.	94.7%
Of the resolutions voted, percentage that Standard Life voted **with** management.	92.4%
Of the resolutions voted, percentage that Standard Life voted **against** management.	5.7%
Of the resolutions voted, percentage where Standard Life **abstained**.	1.9%
Of the resolutions voted, percentage where Standard Life voted against the proxy adviser's recommendation.	5.1%

The following table shows Standard Life's voting summary covering the Plan's investment in the Standard Life Multi-Asset Managed (20%-60% Shared) Pension Fund:

Standard Life Multi-Asset Managed (20%-60% Shared) Pension Fund	1 January 2021 – 31 December 2021
Number of resolutions Standard Life was eligible to vote on over the year	11,319
Of the eligible resolutions, percentage that Standard Life voted on.	95.0%
Of the resolutions voted, percentage that Standard Life voted **with** management.	91.6%
Of the resolutions voted, percentage that Standard Life voted **against** management.	6.6%
Of the resolutions voted, percentage where Standard Life **abstained**.	1.7%
Of the resolutions voted, percentage where Standard Life voted against the proxy adviser's recommendation.	5.3%

Standard Life view all votes as significant and votes globally for all shares of which it has voting authority. Standard Life believe companies should adopt best practice in corporate governance and risk management including the management of environmental and social risks as this makes them more likely to achieve sustainable, long-term investment performance. More specifically Standard Life follow the framework below for its voting decisions:

- *Companies should be run to generate long-term business success*
- *Companies should maintain and protect investor rights*
- *Companies should communicate openly and clearly*
- *Companies should be led and overseen by effective and genuinely independent boards*
- *Companies need to manage key risks actively and effectively*
- *Pay structures should be long-term and aligned with the corporate strategy*
- *Companies should establish and work to maintain an effective and positive corporate culture*

Standard Life votes by proxy as given the scale of its holdings, the Investment Manager cannot be present at all shareholder meetings to cast votes. Standard Life votes by proxy through the Institutional Shareholder Service's ('ISS') electronic voting platform which is guided by the framework above. Standard Life uses ISS to process voting execution and receives recommendations on how to vote but has a customised voting policy that ISS apply and where that is not relevant, Standard Life reviews and decides on all votes.

Analysis of the votes made in respect of each fund predominantly includes voting for ESG factors such as human rights, climate change and corporate structures as well as meaningful reporting and disclosures and voting against renumeration resolutions.

How engagement policies have been followed

The Trustee reviews a summary of the voting and engagement activity taken on their behalf on an annual basis. The information published by the Investment Manager on their voting policies has provided the Trustee with comfort that their voting and engagement policies have been followed during the Plan year.

Engagement with investee companies

Exercising voting rights is not the only method of influencing behaviours of investee companies. Non-equity investments such as the Plan's corporate bond holdings can also include engagement activities, but these investments do not carry voting rights. For example, the Standard Life Annuity Targeting Pension Fund does not have voting or engagement information available as it invests in government bonds.

Standard Life is committed to exercising responsible ownership and believe that companies adopting improving practices in corporate governance and risk management have the potential to deliver enhanced returns to shareholders. Standard Life's fund managers and analysts meet regularly with management and non-executive directors of the companies invested in.

Extent to which Trustees' policies have been followed during the year

Having reviewed the actions taken by Standard Life on behalf of the Trustee, the Trustee believes that their policies on voting rights (where applicable) and engagement have been implemented appropriately over the year and in line with the Investment Manager's policies. The Trustee will continue to monitor the actions taken on their behalf each year and press for improved information from the Investment Manager (both in quantity and quality of data available).

If the Investment Manager deviates substantially from the Trustee's stated policies, the Trustee will initially discuss this with the Investment Manager. If in the opinion of the Trustee the difference between the policies and the Investment Manager's actions is material, the Trustee will consider terminating the mandate.

DB Section

SIP Policies

The Plan invests in a single pooled fund managed by Aberdeen Standard Investments Limited ("abrdn" or "Investment Manager").

If the Investment Manager deviates substantially from the Trustee's stated policies, the Trustee will initially discuss this with the relevant manager. If in the opinion of the Trustee the difference between the policies and the investment manager's actions is material, the Trustee will consider terminating the mandate.

In the latest SIP, the Trustee stated the following policies on the exercise of voting rights and engagement activities related to its investments (the below are partial extracts from the SIP):

- *The investment managers regularly publish detailed results of how their stewardship policies are enacted in practice and the Trustee expects the investment managers to provider regular updates on how they exercise those rights, including how often they vote against company proposals.*
- *The Trustee has delegated the responsibility for the exercise of all rights (including voting rights) attaching to the investments to the investment managers.*
- *The Trustee acknowledges that certain ESG factors are financially material and may therefore influence the risk and return characteristics of the Plan's investments and the likelihood that the Plan's objectives will be achieved. To confirm, no consideration has been given to non-financial considerations, nor has the Plan's membership been consulted on such issues.*
- *As part of the selection, retention and realisation of the Plan's investments, the Trustee, in consultation with their Investment Advisor, have reviewed the ESG and stewardship policies of their investment managers and are comfortable that these policies are consistent with their views.*
- *The Trustee will keep its investments under review, and should they feel that any investment manager no longer acts in accordance with its views on ESG, the Trustee will take the following steps:*
    - *engage with the investment manager in the first instance, in an attempt to influence their policies on ESG and stewardship; and*
    - *if necessary, look to appoint a replacement investment manager or managers that are more closely aligned with the Trustee's policies and views.*
- *These statements are made noting that the Plan's assets are invested in pooled funds and as such, the Trustee is restricted in their ability to directly influence its investment manager on the ESG policies and practices of the companies in which the pooled funds invest.*

Description of Equity Voting Behaviour

Over the year the Plan was invested in one mandate where underlying assets included publicly listed equities. This was the Standard Life Managed Pension Fund.

The following table shows abrdn's voting summary covering the Plan's investment in the Standard Life Managed Pension Fund:

Standard Life Managed Pension Fund	1 January 2021 – 31 December 2021
Number of resolutions abrdn was eligible to vote on over the year	3,047
Of the eligible resolutions, percentage that abrdn voted on.	99.6%
Of the resolutions voted, percentage that abrdn voted **with** management.	93.8%
Of the resolutions voted, percentage that abrdn voted **against** management.	4.4%
Of the resolutions voted, percentage where abrdn **abstained**.	1.7%
Of the resolutions voted, percentage where abrdn voted against the proxy adviser's recommendation.	5.4%

abrdn will only consult with clients before voting who have a segregated mandate in place. For abrdn's active and passive equity holdings, their voting activity is made available to the public on their website. abrdn have identified five categories of votes they deem to be 'significant votes'. In order of importance (with number 1 being the most important) the categories are as follows:

1) **High Profile Votes**
   - Focus on votes which received public and press interest with a focus on our large, active holdings
   - Focus on votes which reflect significant governance concerns regarding the company
   - Resolutions proposed by abrdn
2) **Shareholder and Environmental & Social (E&S) Resolutions**
   - Votes on shareholder E&S proposals where we have engaged with the proponent or company on the resolution
   - Votes on management-presented E&S proposals
   - Focus on shareholder proposals where we have voted contrary to management recommendations
3) **Engagement**
   - Focus on resolutions where we have engaged with the company on a resolution
   - Focus on resolutions where post-engagement we voted contrary to our custom policy
4) **Corporate Transactions**
   - Focus on selected votes which have a financial impact on the investment with a focus on acquisitions
5) **Votes contrary to custom policy**
   - Focus on large active holdings where we have voted contrary to custom policy following analysis

An analysis of votes reveals that the predominant theme for voting against management was around remuneration practices (i.e. rejecting proposed incentive plans and remuneration increases, pushing back on soft performance targets and voting against approval of associated remuneration policies).

Proxy Voting

The Trustee did not employ a proxy-voting service during the Plan year to 31 December 2021.

abrdn votes by proxy as given the scale of its holdings, the Investment Manager cannot be present at all shareholder meetings to cast votes. abrdn votes by proxy through the Institutional Shareholder Service's ('ISS') electronic voting platform. abrdn uses ISS to process voting execution. abrdn receives recommendations on how to vote but has a customised voting policy that ISS apply and where that is not relevant, abrdn reviews and decides on all votes.

How engagement policies have been followed

The Trustee reviews a summary of the voting and engagement activity taken on their behalf on an annual basis. The information published by the Investment Manager on their voting policies has provided the Trustee with comfort that their voting and engagement policies have been followed during the Plan year.

Engagement with investee companies

Exercising voting rights is not the only method of influencing behaviours of investee companies and was not directly applicable for the Plan's non-equity investments as these investments do not carry voting rights.

The Trustee has requested information on engagement activities on behalf of the Plan's investment in the Standard Life Managed Pension Fund when possible.

Extent to which Trustee's policies have been followed during the year

Having reviewed the actions taken by abrdn on behalf of the Trustee, the Trustee believes that their policies on voting rights (where applicable) and engagement have been implemented appropriately over the year and in line with the Investment Managers' policies. The Trustee will continue to monitor the actions taken on their behalf each year and press for improved

If the Investment Manager deviates substantially from the Trustee's stated policies, the Trustee will initially discuss this with the Investment Manager. If in the opinion of the Trustee the difference between the policies and the Investment Manager's actions is material, the Trustee will consider terminating the mandate.