## CHB IC Detailed risk register EXCLUDING COMPLETED ACTIONS

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## Rows are sorted by Risk Score

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Scor	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Current Risk score change indicator
CHB IC 01 Insufficient assets - City's Estate 08-Mar-2018 Kate Limna; Jenny Wong	Cause: The asset allocation of the City's Estate investment portfolio is unable to fund long term expenditure requirements due to market movements.  Event: There are insufficient assets to meet expenditure requirements.  Effect: Reduced income or lower than anticipated growth which could impact on the Corporation's medium term financial plans. City's Estate would be required to sell financial assets to fund expenditure requirements.	Impact 12	From 1 April 2024 the return target for City's Estate has been set at CPI+4% on a rolling 5year basis.  11 November 2024	Impact 8	31-Mar- 2025	Constant

Action no	Action description			Latest Note Date	Due Date
CHB IC 01a	every three years by the Investment Committee.	(property and financial investments).	Al-		31-Mar- 2025

	<ul> <li>City Fund and City's Estate: diversification of asset classes within appetite and appropriate pace for transition.</li> <li>City Fund &amp; City's Estate: Suitable income targets.</li> <li>The City's Estate Investment strategy is expected to be reviewed in 2024/25.</li> </ul>		
CHB IC 01b	Committee for consideration.	Limna	31-Mar- 2025

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CHB IC 02 Targeted returns - City's Estate  08-Mar-2018 Kate Limna; Jenny Wong	Cause: Fund managers fail to achieve the targeted investment returns because  • the Committee appoints unsuitable fund managers,  • individual fund managers underperform against the benchmarks agreed by the Committee,  • aggregate fund manager performance fails to achieve the Committee's long-term targets  Event: Failure to be seen to manage the fund responsibly. Effect: Supervisory intervention over management of the funds.	Impact	6	The performance of fund managers and their aggregate performance is reported against target to each Investment Committee. The Committee sets a diversified investment strategy to mitigate volatility and as such it expects different parts of the strategy to outperform at different times.  Where relative returns are negative, Members and officers seek to understand why in order to determine whether there is continued conviction in the manager's strategy to recover performance.  11 November 2024	Impact	6	31-Mar- 2025	Constant

Action no	Action description	Latest Note		Latest Note Date	Due Date
CHB IC 02a	Investment managers' performance and their aggregate performance is measured against appropriate benchmarks and monitored by the Investment Committee throughout the year. It is supplemented by market insight from the Corporation's investment consultants which provides peer group comparisons; checks on movement of key officers; and reviews on the incorporation of ESG considerations in implementing their investment strategies.  Fund managers are invited to meet with Officers and Members to account for their performance as and when the Committee deem this necessary/as required.	to the Investment Committee on <del>03 October 2024 <u>02 December 2024.</u></del>	Limna		31-Mar- 2025

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Current Risk score change indicator
CHB IC 03 Service provider failure	Cause: Corporate, financial, economic or cybersecurity threats result in service provision withdrawal or liquidation of partner organisations.  Event: Failure of fund manager, investment consultant or other service provider without notice.  Effect: Asset valuations at risk or a period of time without service provision.	Impact	Officers meet regularly with fund managers, investment consultants and other service providers. Officers write to all counterparties requesting latest internal control report from fund managers and custodian ahead of the closure of accounts.	77	31-Mar- 2025	-
08-Mar-2018 Kate Limna; Jenny Wong			11 November 2024			Constant

Action no	Action description	Latest Note		Latest Note Date	Due Date
CHB IC 03a	Detailed due diligence is carried out when new fund managers, investment consultant or other service provider are appointed.	New manager due diligence undertaken in consultation with investment consultant. There are eurrently no plans to appoint any additional managers. The current investment consultant contract was re-tendered via the National LGPS procurement framework. Following a rigorous and competitive exercise Mercer were appointed to the role in October 2021.			31-Mar- 2025
CHB IC 03b		Corporate Treasury compile an archive of the most up to date relevant annual internal control reports issued by all issuing fund managers and custodian as part of statement of account compilation across Funds. All internal control reports from the pooled fund managers have been received where available. Officers are in the process of reviewing the findings of the reports to ensure they remain satisfied with the control environments operated by the Corporation's appointed asset managers.			31-Mar- 2025
CHB IC 03c	Monitor markets regularly through financial publications and seek advice of managers and investment consultant when appropriate.	Officers regularly monitor financial press and industry publications particularly in search of any news regarding entities that have an existing relationship across the Corporation's Funds.	Kate Limna		31-Mar- 2025

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Current Risk score change indicator
CHB IC 07 Failure to discharge responsible investment duties  20-Jun-2019 Jenny Wong	Cause: Insufficient attention is paid to the environmental, social and governance (ESG) dimensions of the Corporation's financial investments.  Event: The Corporations' financial investments include an underappreciated exposure to negative ESG risks and the means to effectively manage such risks is not understood.  Effect: The Corporation suffers reputational or financial damage.	Impact 4	The Investment Committee inherits an advanced approach to responsible investment and asset stewardship. The Corporation (via the previous Financial Investment Board) has formally recognised its asset stewardship role and the need to manage ESG risks through its Responsible Investment Policy which also outlines the Corporation's approach in this area. The City of London Corporation (as a whole) is a signatory to the Principles for Responsible Investment (PRI).  The then Financial Investment Board (now Investment Committee) undertook an in-depth review of its climate risk exposure (including the use of scenario analysis) in 2021 resulting in a commitment to achieve net zero carbon emissions by 2040 together with the development of interim goals via a transition pathway.  The Corporation second scenario analysis will be undertaken during 2024/25 to better understand the latest risks and opportunities associated with the City's Financial investments.	Impact	31-Mar- 2025	Constant

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB IC 07a	Reporting on responsible investment activities to the Principles for Responsible Investment is completed on an annual basis. The Committee (along with other relevant Committees/Boards) receives an annual Transparency Report from the PRI from which it can evaluate progress against responsible investment goals.	The PRI 2024 reporting period opened May 2024 and the Corporation placed its submission by the 26 July 2024 deadline.  The PRI have not confirmed when they will release the results at this stage. The PRI will release the results in November 2024.	Kate Limna	11- November- 2024	31-Mar- 2025
CHB IC 07c	As part of the regular management and monitoring of investment mandates, the Committee and responsible officers challenge investment managers on ESG issues arising in the portfolio. The Investment Consultant reports to the Committee on its monitoring of ESG risks on a quarterly basis.	The Committee receives regular updates on ESG standings amongst its appointed investment managers from the Investment Consultant on a quarterly basis. The Committee has established new climate risk expectations for existing and potential investment managers and these form part of the regular ongoing monitoring of managers' performance.	Limna November- 2 2024		31-Mar- 2025
CHB IC 07e	There is a general commitment by the City Corporation to meeting the standards of the new 2020 UK Stewardship Code and needs to ensure compliance is developed. The Committee reviews asset stewardship across its investment mandates on an annual basis and uses the exercise to encourage better ESG outcomes amongst its existing managers (this will need to be done in conjunction with other committees which now have investment oversight responsibilities).	All of the City's Estate UK-based pooled fund managers (i.e. excluding the alternative assets portfolio) are signatories to the Stewardship Code.	Kate Limna	November- 2024	31-Mar- 2025
CHB IC 07f	The Committee (along with other relevant Committees/Boards) has been assigned several key actions which will enable the Corporation to deliver its Climate Action Strategy. Key to this is achieving a clear plan on how to achieve Paris-alignment by 2040.	With the support of a specialist external consultancy firm, an in-depth review of the climate risk exposure involving the use of scenario analysis, the development of a transition pathway consistent with a net zero by 2040 commitment, and the establishment of expectations for existing and potential mandates was undertaken. The transition pathway itself involves a series of specific actions with various deadlines which the Committee (along with other relevant Boards and Committees) will target over the coming years.  The Corporation second scenario analysis will be undertaken during 2024/25 to better understand the latest risks and opportunities associated with the City's Financial investments.	Kate Limna	11- November- 2024	31-Mar- 2025

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CHB IC 04 Counterparty failure - Treasury Management  08-Mar-2018 Kate Limna; Jenny Wong	Cause: External events, including cybersecurity incidents, threaten the solvency of counterparties the Corporation has lent to.  Event: Failure of counterparty to fulfil obligation to the Corporation, i.e. default on repayments.  Effect: Asset valuations at risk.	Impact		The current Treasury Management Strategy restricts lending to high-quality counterparties and remains fit for purpose. External credit ratings for existing counterparties are currently at acceptable levels.  11 November 2024	£	4	31-Mar- 2025	Constant

Action no	Action description	Latest Note		Latest Note Date	Due Date
CHB IC 04a	Detailed due diligence is carried out when new counterparties are onboarded.	Independent analysis and consultation with treasury investment advisor when adding additional counterparties.  Where the Corporation invests in money market funds, officers monitor the funds' weekly liquidity profiles to ensure the vehicles retain adequate liquidity. At present, there are no liquidity concerns with any of the Corporation's existing fund counterparties. These funds invest in very short term and very high-quality instruments, so default risk is low.  The Corporation's short-dated bond fund investments are more sensitive to changes in economic conditions and performance is more volatile. Short term interest rates increased during 2023 and this had a negative impact on the total returns available from the short-dated bond funds. However, the Corporation invests in these instruments on a longer-term basis (at least three years) where there is a greater tolerance for volatility in returns, and these only impact City Fund.  Officers also continue to monitor changes in the credit standing of direct counterparties via ratings changes from the three main credit rating agencies and other news.	Kate Limna	11- November- 2024	31-Mar- 2025
CHB IC 04b	When lending directly to counterparties, ensure they meet the minimum credit criteria as set out in the most recent Treasury Management Strategy Statement.	All lending is conducted within the parameters of the current 2024/25 Treasury Management Strategy Statement & Annual Investment Strategy (relating to Treasury Management) (TMSS) as agreed by Court of Common Council (CoCo) on 7 March 2024. Additionally, officers have implemented financial metric-based criteria for determining the eligibility of local authority	Kate Limna	11- November- 2024	31-Mar- 2025

		borrowers. When onboarding new financial institutions, officers review banks' financial standing including standard financial reporting ratios for assessing capitalisation and liquidity.		
CHB IC 04c	and financial publications, plus seeking the advice of treasury investment advisors when appropriate	8 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		31-Mar- 2025