

CHB IC Detailed risk register EXCLUDING COMPLETED ACTIONS

Report Author: Jenny Wong

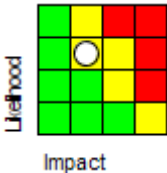
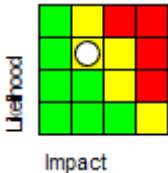
Generated on: 01 July 2025



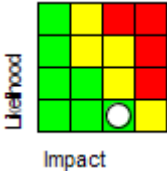
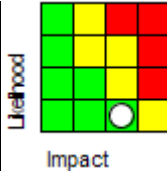

Rows are sorted by Risk Score

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 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.	 Likelihood Impact	12	From 1 April 2024 the return target for City's Estate has been set at CPI+4% on a rolling 5-year basis. An Investment Beliefs Survey has been circulated to Members to help the investment consultant to better understand the collective views of the Committee and to help guide City Estate's strategic asset allocation implementation. 01 July 2025	 Likelihood Impact	8	31-Mar-2026	 Constant

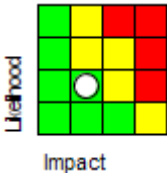
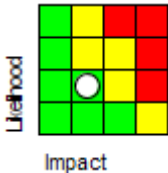

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB IC 01a	The City's Estate investment strategy is reviewed at least every three years by the Investment Committee.	The City appointed Stanhope Capital as the outsourced Chief Investment Officer function (OCIO) reporting to the Chamberlain and covering City Fund (property) and City's Estate (property and financial investments) in February 2023. Their work was completed in February 2025 but they have been retained to produce the <u>quarterly</u> performance dashboard.	Caroline Al-Beyerty; Kate Limna	01-Jul-2025	31-Mar-2026
CHB IC 01b	The investment performance is measured against absolute return targets required to meet long term objectives. This is reported to the Investment Committee throughout the year and is supplemented by market insight from the Corporation's investment consultants which will assist any strategic decisions required in between the three-year formal strategy reviews.	City's Estate investment performance will be brought to each meeting of the Investment Committee for consideration.	Kate Limna	01-Jul-2025	31-Mar-2026

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 02 Targeted returns - City's Estate 08-Mar-2018 Kate Limna; Jenny Wong	Cause: Fund managers fail to achieve the targeted investment returns because <ul style="list-style-type: none"> 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.		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. 01 July 2025		6	31-Mar-2026	Constant

Action no	Action description	Latest Note		Action owner	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.	The latest performance for City's Estate Fund to 31 March 2025 <u>31 May 2025</u> is reported to the Investment Committee on 27 May 2025 <u>21 July 2025</u> .		Kate Limna	01-Jul-2025	31-Mar-2026

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 08-Mar-2018 Kate Limna; Jenny Wong	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.		4	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. 01 July 2025		4	31-Mar-2026	 Constant

Action no	Action description	Latest Note	Action owner	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. 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.	Kate Limna	01-Jul-2025	31-Mar-2026
CHB IC 03b	Review of internal control reports on annual basis.	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.	Kate Limna	01-Jul-2025	31-Mar-2026
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	01-Jul-2025	31-Mar-2026

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.		4	The Investment Committee inherits an advanced approach to responsible investment and asset stewardship. The Corporation 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). 01 July 2025		4	31-Mar-2026	 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.	<p>The PRI released results for 2024 in November 2024 and this was reported to the Investment Committee on 17 February 2025.</p> <p>The PRI 2025 reporting period opens opened on 7 May 2025 and closes on 30 July 2025. The Corporation will be making its submission by this deadline.</p>	Kate Limna	01-Jul-2025	31-Mar-2026
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.	Kate Limna	01-Jul-2025	31-Mar-2026
CHB IC 07e	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 is done in conjunction with other	City's Estate's UK-based pooled fund managers (i.e. excluding the alternative assets portfolio) are signatories to the UK Stewardship Code.	Kate Limna	01-Jul-2025	31-Mar-2026

	committees which now have investment oversight responsibilities).				
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.	The current pathway to net zero in 2040 and existing interim targets are currently under review and will inform actions for the period beyond 2027. These will be brought to this Committee in due course for consideration.	Kate Limna	01-Jul-2025	31-Mar-2026

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 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.		2	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. 01 July 2025		4	31-Mar-2026	
								Constant

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CHB IC 04a	Detailed due diligence is carried out when new counterparties are onboarded.	<p>Independent analysis and consultation with treasury investment advisor when adding additional counterparties.</p> <p>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.</p> <p>The Corporation's short-dated bond fund investments are more sensitive to changes in economic conditions and performance is more volatile. 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.</p> <p>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.</p>	Kate Limna	01-Jul-2025	31-Mar-2026
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 2025/26 Treasury Management Strategy Statement & Annual Investment Strategy (relating to Treasury Management) (TMSS) as agreed by Court of Common Council (CoCoCo) on 6 March 2025. Additionally, officers have implemented financial metric-based criteria for determining the eligibility of local	Kate Limna	01-Jul-2025	31-Mar-2026

		authority borrowers. When onboarding new financial institutions, officers review banks' financial standing including standard financial reporting ratios for assessing capitalisation and liquidity.			
CHB IC 04c	Monitor markets regularly through credit rating updates and financial publications, plus seeking the advice of treasury investment advisors when appropriate	Officers continually monitor for credit rating updates as well as the financial press and industry publications in search of any news regarding the Corporation's counterparties. Treasury investment advisors provide rating agency credit watches and other market data including Credit Default Swap prices on money market participants.	Kate Limna	01-Jul-2025	31-Mar-2026