## **INVESTMENT COMMITTEE - IC Overarching - Detailed Report**

Report Type: Risks Report Report Author: Jenny Wong

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Rows are sorted by Risk Score

#### Risk Level Description Service

Risk Code	CHB IC Overarching	Risk Title	IC 02 External Economic risk
-			

negotiations etc.) **Event:** Sharp rise in energy prices and inflation, collapse in sterling and/or downturn in property and financial markets leading to a reduction in purchasing power, decline in investment values and/or erosion of reserves

Cause: Adverse global economic developments or unexpected geopolitical crisis (e.g. Russian invasion of Ukraine, global trade

Description

**Effect:** Failure to meet real return objectives and maintain the purchasing power of distributions – failure to match rising demands from the operational activities supported by the portfolio – reputational and organisational risk if budgets need to be cut as a result – balance sheet problems potentially created if the downturn in asset prices is sustained (e.g. inability to set up sinking fund for debt repayment)

Current Risk	Impa Impa	ct
Risk Score	Likelihood	Impact

Risk Score	Likelihood	Impact
Target Risk	Likelhood	

Original Risk	[Kehood	O D
Risk Score	Likelihood	Impact

12	Possible	Major
Amber	Trend	Constant

6	Possible	Serious
Amber	Target Date	31-Mar-2026

12	Possible	Major	
Amber	<b>Creation Date</b>	03-May-2024	

Continuous monitoring of external developments across markets.

Appointment of external managers for the financial portfolio with discretion to take appropriate action in the event adverse economic developments or a geopolitical crisis – advice also provided by external investment consultants.

As at July 2025, market sentiment continues to be dominated by the Trump Administration and the ongoing reciprocal tariff discussions. Despite the political turmoil, US markets reported strong growth over the quarter and EU and UK markets also showed cautious optimism, recovering from earlier volatility and rebounding despite weak growth and persistent inflation.

#### Latest Note

Despite markets being once again driven by geopolitical uncertainty as the second quarter opened with the passage of the Trump Administration's 'One Big Beautiful Bill Act', equity markets sustained their upward momentum over the period fuelled by the continued Artificial Intelligence (AI) boom and strong corporate earnings. By mid-September, trade policy settled and signs of easing monetary policy emerged. These factors combined to push global equity indices to new all-time highs, with the US leading the way. Global equities extended their rally in October, led by U.S. large-cap technology and AI-driven gains, whilst in the UK, uncertainty around fiscal policy and inflationary pressures continues to mount as the delivery of the Autumn Budget looms on 26 November.

The UK property market is being impacted by the prospect of political risks impacting UK fiscal policy. There is a consequential increasing risk associated with pricing of capital investments and liquidity.

Risk Level	Service
Department	Chamberlain's

Risk Approach	Reduce
Risk Owner	Caroline Al-Beyerty

10-Nov-2025

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
IC 02a	the overall asset allocation in the portfolio takes account of major economic and political risks.	The proposed ranges for property and financial assets reflect the portfolio's long term time horizon and return objective but shorter term economic and political developments are monitored by the Chamberlain's office to ensure appropriate action may be taken via the liquid financial portfolio before a major correction in markets.	10-Nov-2025	Caroline Al- Beyerty	31-Mar-2026
IC 02b	This action seeks to ensure that positions in the financial portfolio	The financial portfolio is invested in a range of funds whose managers will take account of major economic and political developments in their stock and sector selection. The financial portfolio is also monitored on a regular basis by the investment consultant, Mercer, whose role is to report on performance and highlight key risks within the portfolio.	10-Nov-2025	Kate Limna	31-Mar-2026
IC 02c	This action seeks to ensure that the capital realisation programme	The team is contingency planning, looking to bring forward alternative properties to be considered for realising capital. This is with the aim that the capital realisation programme will progress within the timeframe required. There are different challenges relating to City Fund and City's Estate – specifically a primarily timing risk for City Fund realisation and a risk against quantum for City's Estate. Differing strategies are being applied to address these risks. and differing approaches will result.	10-Nov-2025	Robert Murphy	31-Mar-2026

Risk Code CHB IC Overarching	Risk Title	IC 05 Sustainability and impact
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	Cause: Insufficient attention is paid to the City's sustainability goals and Climate Action Strategy in managing the investment
	portfolio
	<b>Event:</b> Negative news stories create an adverse public perception of the City' approach to sustainable investment, reputational
	damage and potential loss of trust in the City's financial stewardship
Description	
•	investment decisions based on financial factors without due consideration of their impact on sustainability could also create
	reputational risk and public relations efforts to repair the City's reputation would incur unnecessary costs – the lack of a clear
	impact measurement framework does not allow for an accurate assessment of performance and could delay achieving the
	sustainability goals
	Sustainability goals

Current Risk	Impact			
Risk Score	Likelihood Impact			
6	Possible	Serious		
Amber	Trend	Constant		

Target Risk	Impact			
Risk Score	Likelihood	Impact		
4	Unlikely	Serious		
Green	Target Date	31-Mar-2026		

Original Risk	Impac	at t
Risk Score	Likelihood	Impact
4	Unlikely	Serious
Green	<b>Creation Date</b>	05-May-2024

	Regular monitoring and reporting of the portfolio against sustainability and climate change targets enabling the Investment Committee to challenge officers and staff on progress.		
	Selection of external managers who are able to manage their portfolios in line with the City's sustainable and climate action objectives – changing external managers when necessary.	10-Nov-2025	
	Setting clear sustainability objectives for the internal property team and assessing their recommendations in light		

of those objectives.	
Impact Investment training for Members was undertaken on 10 July 2025. A further impact investing session is being considered during 2025/26.	

Risk Level	Service	Risk Approach	Reduce
Department	Chamberlain's	Risk Owner	Caroline Al-Beyerty

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
IC 05a	relevant Committees/Boards) has been assigned several key actions which will enable the	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.	10-Nov-2025	Caroline Al- Beyerty	31-Mar-2026
IC 05b	The Committee receives update reports on climate (both financial and property) on a quarterly basis.	For the financial assets, climate date is collected quarterly from managers and reported to Members. Annually data (as at 31 March) covering all the workstreams of the City's Climate Action Strategy are published on the Climate Action Dashboard.	10-Nov-2025	Caroline Al- Beyerty	31-Mar-2026
IC 05c	The Climate Action Team within I&G have reorganised with an Investment Board to oversee the delivery of the actions to meet	The Board meets quarterly. The last meeting was held on the 10 July 22 September 2025 with further meetings scheduled. The next meeting is on 22 September 2025.	10-Nov-2025	Kate Limna; Robert Murphy	31-Mar-2026

	the targets of the Climate Action Strategy. Included within the Board are financial, investment property and goods and purchasing.				
IC 05d	<ul> <li>Investment Property Portfolio</li> <li>The alignment of the organisation's property portfolio with the future strategic needs of occupiers, particularly supporting</li> </ul>	For the property assets, Climate Action is an area of focus for the entire real estate industry and commercial property occupiers including the City of London. It is imperative that the organisation progresses its property estates to support this growing area of demand.  This is supported by the City's Climate Action Strategy, which seeks to achieve net zero carbon emissions across our investments and supply chain by 2040.  The delivery of Climate Action across the City's investment portfolio is regularly reported through to Investment Committee though the Climate Action Dashboard and business planning.  Asset Managers are receiving additional training to enhance their understanding of the subject and the application of appropriate management measures. A specialist surveyor has been appointed to work within IPG to support the AMs and ensure coherent plans will be evolved.	10-Nov-2025	Robert Murphy	31-Mar-2026

Risk Code CHB IC Overarching	Risk Title	IC 01 Investment performance: Strategy risk
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	Cause: Inappropriate split of assets between property and financial assets and/or inappropriate asset allocation within the underlying property and financial portfolios.
Description	<b>Event:</b> Poor assessment of market conditions and outlook for returns – failure to react to changes in market conditions leading to lower than expected returns/income, decline in capital or insufficient liquidity.
	Effect: Failure to meet return targets and spending commitments – significant decline in capital – shortfall in income – inadequate liquidity – forced sales of assets at an inopportune moment in order to fund distribution requirements

Current Risk	Impact			
Risk Score	Likelihood Impact			
6	Possible	Serious		
Amber	Trend	Constant		

	Target Risk	Impact			
	Risk Score	Likelihood	Impact		
ĺ	4	Unlikely	Serious		
	Green	Target Date	31-Mar-2026		

Original Risk	Impact		
Risk Score	Likelihood	Impact	
6	Possible Serious		
Amber	<b>Creation Date</b>	03-May-2024	

	Top level and underlying portfolio Strategic Asset Allocation (SAA) reviewed formally every three years by the IC with annual updates with specialist advice provided by investment consultants.		
Latest Note	Performance monitored on a regular basis against targets to highlight any shortfall and potential action needed.	10-Nov-2025	
	Positions monitored on a regular basis to ensure that they remain appropriate in light of changing market conditions with specialist advice provided by investment consultants.		

Risk Level	Service
Department	Chamberlain's

Risk Approach	Reduce
Risk Owner	Caroline Al-Beyerty

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
IC 01a	achieve the portfolio's real return	The appropriate split between the property and financial portfolios was reviewed by the Investment Committee on advice from the OCIO team in December 2023 and formal long-term ranges have been proposed for property assets of 50-60% and financial assets 40-50%. The ranges reflect the diversification benefits which would accrue from an increase in the financial portfolio's share of the combined portfolio while taking into account the illiquid nature of the property portfolio. The intention is to bring the combined portfolio into line with the formal ranges gradually to avoid forced sale of properties in the current weak market conditions.  The portfolio split is currently outside the tolerance range due to unfavourable market conditions for property disposals however the rebalancing of the portfolio is ongoing, and officers will continue to monitor the environment.	10-Nov-2025	Caroline Al- Beyerty	31-Mar-2028
IC 01b	Property Investment Strategy Risk	The overall composition of the portfolio is to be shaped to take advantage of emerging	10-Nov-2025	Robert Murphy	31-Mar-2026

	This action seeks to balance the organisation's ability to maximise its property returns for an acceptable level of risk. This is covered in further detail in the City Surveyor's Departmental Risk SUR SMT 003.	segments of growth, whilst managing exposure to property types which are showing reduced demand. This, in turn, is an additional driver to ensure that City assets meet the climate aspirations of our occupiers.  The Real Estate Investment Strategy was approved by Investment Committee in July, and by Corporate Services Committee in September. This strategy seeks to further manage this risk and take advantage of emerging opportunities. Further, the strategy sought to ensure that the department has sufficient specialism of skills and capacity to deliver against this approach and recruitment has now been successfully delivered. (departmental risk SUR SMT 016) and recruitment is now in process to progress this item.  A strategy for realising capital from the investment portfolio over the next 5 years to help fund the major projects has been approved which will in the short-term effect returns. A strategy to improve performance post disposals is to be formulated.			
IC 01c	Financial Investment Strategy risk  This action seeks to ensure that the financial portfolio has the	The appropriate long-term strategy for the financial portfolio was reviewed by Mercer, the financial portfolio's investment adviser in July with a number of changes proposed to improve the balance of risk and return in the	10-Nov-2025	Caroline Al- Beyerty; Kate Limna	31-Mar-2026

appropriate strategy and management structure to generate a sufficient return to meet the portfolio's objective without taking excessive risk	portfolio including the recommendation of a specific allocation to private credit and infrastructure funds. These were presented to the Investment Committee at its July meeting.  The Index-linked Gilts, Fixed Interest Gilts, and Investment Grade Corporate Bonds allocations were funded in May/June 2025. The financial investments will continue to be used to fund Major Projects until property investments are liquidated at which point the portfolio can be rebalanced.	
	At the October meeting, it was agreed that an informal working group of Members would meet to discuss Mercer's proposed Investment Business Plan for City's Estate and potential opportunities for financial investments. The first meeting is scheduled to take place on 27 November 2025.	

Risk Code CHB IC Overarching	Risk Title IC 03 (	overnance/ Compliance risk
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# Cause: Inadequate understanding of regulations and investment practices among Members, officers and other staff involved in the investment portfolio etc. Event: Committee Members and officers do not have appropriate skills or knowledge to discharge their responsibilities.

Regulatory breach.

**Effect:** Inappropriate decisions are made leading to a financial impact, or a breach of legislation or service not provided in line with best practice and legal requirements. Potential regulatory fines.

Current Risk	Impact	
Risk Score	Likelihood	Impact
4	Unlikely Serious	
Green	Trend	Constant

Target Risk	Impact	
Risk Score	Likelihood	Impact
2	Rare	Serious
Green	Target Date	31-Mar-2026

Original Risk	Impact	
Risk Score	Likelihood	Impact
4	Unlikely	Serious
Green	<b>Creation Date</b>	03-May-2024

Latest Note
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Risk Level	Service	Risk Approach
Department	Chamberlain's	Risk Owner

Risk Approach	Reduce
Risk Owner	Kate Limna; Jenny Wong

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
IC 03a	Training provided to Committee Members on a range of investment topics and asset classes on a needs basis. Continued Professional Development (CPD) records maintained and updated annually.	In November 2023, two Treasury Management training sessions were held for Members of the Investment Committee and Finance Committee. The first session provided an appreciation of what Treasury management involves, how it is undertaken, the roles of Members and Officers, and the risks in Treasury Management and how they should be managed. The second session covered developing the Treasury Management Strategy, including Prudential Indicators, cashflow forecasts, investment strategy, credit worthiness, counterparty list, ESG considerations, and a review of the investment portfolio and an economic outlook.  Following Member elections in March 2025, a finance induction session was held on 7 April 2025 for new Members of the Court of Common Council.  A high level overview of City's finances (which are overseen by the Investment Committee) was provided to two of the three new independent Members on 10 April 2025.  Impact Investment training for Members was undertaken on 10 July 2025 and a further impact investing session is being considered	10-Nov-2025	Kate Limna	31-Mar-2026

		during 2025/26.  During Autumn 2025, the Treasury Management training sessions will be arranged in 2026 to refresh Members of the Investment Committee and Finance Committee.			
IC 03b	Job descriptions used at recruitment to attract candidates with skills and experience related to investment finance. The Corporation maintains membership of CIPFA's Pension Network, CIPFA's Treasury Management Network plus the LAPFF, LPFA and PLSA Pensions UK (previously PLSA) – all providing access to training opportunities via courses, seminars and conferences.	Officers continue to attend training courses, seminars and conferences where deemed appropriate to enhance understanding of markets, financial instruments, regulatory and statutory reporting issues.	10-Nov-2025	Caroline Al- Beyerty; Kate Limna	31-Mar-2026
IC 03c	Training plans in place for all staff as part of the performance appraisal arrangements, which are reviewed every six months.	Performance and development appraisals continue to be carried out in line with corporate policy.	10-Nov-2025	Caroline Al- Beyerty; Kate Limna	31-Mar-2026
IC 03d	External professional advice sought where required.	The investment consultant attends each meeting of the Investment Committee providing advice on investment matters.	10-Nov-2025	Kate Limna	31-Mar-2026

Risk Code	CHB IC Overarching
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# Description

Cause: Inaccurate cash flow modelling for Corporation as a whole.

**Event:** There is insufficient cash available to meet day to day obligations.

**Effect:** The organisation is forced to liquidate long term investment assets without adequate planning or fails to identify external borrowing requirements. Overdrawn position incurs unnecessary expenditure and missed payments damage the Corporation's reputation. Inefficient treasury management decisions increase costs.

Current Risk	Impact	
Risk Score	Likelihood Impact	
4	Rare	Major
Green	Trend	Constant

Target Risk	DOUBLE DE LIMITE	
Risk Score	Likelihood	Impact
4	Rare	Major
Green	Target Date	31-Mar-2026

Original Risk	Impact		
Risk Score	Likelihood	Impact	
8	Unlikely	Major	
Amber	<b>Creation Date</b>	05-May-2024	

Latest	Note

Officers continue to maintain a cash flow model projecting the Corporation's cash flow requirements for the forthcoming year on an on-going basis. Cash flow is regularly monitored, and short-term cash balances are invested over appropriate time horizons.

10-Nov-2025

Risk Level	Service
Department	Chamberlain's

Risk Approach	Reduce
Risk Owner	Kate Limna; Jenny Wong

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
IC 04a	year forward to ensure a sufficient level of on-going	The Treasury cash flow model maintained and updated on a daily basis, incorporating known flows and estimating payments and income of uncertain timing based on historic cash flow profiles and estimations for the timing and value of future payments and receipts.	10-Nov-2025	Kate Limna	31-Mar-2026
IC 04b	enables the Corporation to further understand the likely timing of any future need to liquidate long term investment	Officers maintain a medium-term cash flow forecast on a monthly basis based on City Fund and City's Estate projected balance sheet. This forecast is updated in line with the evolution of the medium-term financial plan, including changes in revenue and capital assumptions.	10-Nov-2025	Sarah Port; David Abbott	31-Mar-2026