



# Assessment of Value Report

## WS Sequel Investment Funds ICVC II

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# Letter from the Board

The Waystone Group ('Waystone') is a leading provider of institutional governance, risk, administration and compliance services to the asset management industry, with a global presence of over 1,800 experts across the UK, US, EMEA and APAC regions. This is a very exciting time for our company and our continued commitment is to put you, the investor, and our asset managers at the heart of all that we do. Together we will be able to provide current and new sponsors, clients and investment managers with a more comprehensive set of services to support investors' needs as they continue to evolve and grow.

I am the Independent Non-Executive Chair of the Waystone Management (UK) Limited ('WMUK') Board, and Independent Chair of its Value Assessment Committee. I have specific overall responsibility for the annual Assessment of Value reporting and I, supported by Elizabeth Tracey and Simon White (the other Independent Non-Executive Directors of the Board), seek to ensure that WMUK acts in investors' best interests and adheres to the highest standards of product governance. We are the independent voice of you, the investor, and this Assessment of Value has been produced with you in mind.

Through the Assessment of Value process, our responsibility is to assess whether the payments from each fund are justified in the context of overall value delivered to investors. The Board's top priority is ensuring that our funds deliver the best possible outcomes for investors over the recommended holding period ('RHP'). By this we mean investment returns that are consistent with the investment objective and policy of the fund, and equitable and transparent cost structures relative to our peers, combined with excellent service levels. At WMUK, creating and maintaining value for investors is integral to everything we do. The principle of delivering value is woven into every stage of the oversight of our investment managers, operations, product development and governance processes. We welcome the opportunity to share our report for the past twelve months with you. While this report is published on an annual basis, each step of our wider governance process ensures that all of our funds are regularly reviewed throughout the year.

## Market Review

Whilst the outbreak of COVID-19 in March 2020 now seems a distant memory, Russia's incursion into Ukraine in February 2022 remains an unresolved conflict that has led to inflationary pressures globally. Add to this the Israel-Hamas conflict that commenced in October 2023, and we are faced with consequences in both the domestic and the global economy. Significant increases in the prices of energy and commodities have reverberated around the world, leading to many countries experiencing inflation at levels not seen for many years. To curb the inflation, many nations' central banks progressively increased interest rates. However, in light of slowing growth in the second half of 2024, most central banks ended their aggressive tightening and started to loosen their monetary policies. Although the consequences of the geopolitical events remain unclear, the global economy has shown resilience to the inflationary environment and gives hope that a 'soft-landing' is attainable.

July brought political uncertainty in Europe with snap elections in the UK and France which had a moderate impact on financial markets. Western Central Banks in the US, Eurozone and UK started cutting interest rates to support the job market and deteriorating manufacturing activity, as inflation continued to ease. In the US, the change of political power from Democrat to Republican had a positive impact on US equities, as President Trump vowed to reduce corporate tax and increase spending to boost the economy. The immediate impact on fixed

income markets was negative as his pro-economy policy brought some uncertainty on the future inflation trend. This has been offset by the US Federal Reserve's November and December rate cuts, keeping its policy focus unchanged on actual inflation and economic data rather than the results of the elections.

Post the end of the 2024 reporting period, financial markets endured significant volatility as a direct consequence of the Trump administration's trade and tariff policies. Investor sentiment wavered, prompting widespread repricing across equity, credit, and foreign exchange markets. Sectors with high international exposure, notably manufacturing and consumer goods, faced pronounced headwinds.

## Value Assessment Framework

Full details of our value assessment process can be found in the 'Our Value Assessment Process' section of this report.

We have implemented the FCA's new Consumer Duty regulations, which came into force in July 2023 with the aim of introducing higher standards of customer care across all financial products, including funds. This new regulation contains enhanced requirements for WMUK to "act to deliver good outcomes for retail customers". This overarching requirement is supplemented by four "outcome" requirements relating to:

- Products and Services
- Price and Value
- Consumer Understanding
- Consumer Support

Although the Consumer Duty is new, many of the requirements – including the first two outcomes – are existing requirements reconfirmed. For some time, we have followed both formal product governance requirements and produced value assessment reports. Save where we identify enhancement opportunities over time, these will continue largely as before. The areas where you will see greater emphasis and information will principally be those relating to Consumer Understanding and Consumer Support. In particular, there is a greater range of guidance material available on our website or on request and, in the future, we are likely to place greater focus not just on customer service, but also on ensuring that we are providing investors with the information they need to make informed decisions regarding their investments.

Demand for sustainable products and services has been increasing, and non-financial criteria are becoming a more important part of the investment process. The implementation of the UK's Sustainability Disclosure Requirements ('SDR') in 2024 aims to enhance trust, credibility, and integrity in the sustainable finance market by ensuring investors can trust the sustainability claims of their products. A key component is the anti-greenwashing rule which requires sustainability statements to be clear, fair, and not misleading. The oversight of all our funds' sustainability exposures will continue to evolve in response to investor needs and legislation and, where appropriate, will become increasingly prominent in our Assessment of Value. Socially responsible investing continues to be a significant consideration for investors, with Environmental, Social and Governance ('ESG') a key factor for the wider world as well as for our industry. Poor practices may not just damage a company's reputation but may lead to material fines or restrictions on operations. Encouraging companies to prioritise responsible and

# Letter from the Board continued

sustainable solutions can have a positive impact on the environment, communities, and investment returns. The UK Government was the first G20 country to mandate Task Force on Climate Related Financial Disclosures ('TCFD') reporting for large financial firms. WMUK published its first TCFD report in June 2024.

Open and transparent communication with investors is important to us, so we do hope that this report will provide a useful insight and help to inform your investment decisions. Thank you for taking the time to read our report and, if you have any feedback about the report, we would be delighted to hear from you. Please email us at [aovfeedback@waystone.com](mailto:aovfeedback@waystone.com).

**Tim Madigan, Independent Non-Executive Chair**

**For and on behalf of the Board of Directors**

Waystone Management (UK) Limited

April 2025

# Company Details

Company	WS Sequel Investment Funds ICVC II
Authorised Corporate Director (ACD)	Waystone Management (UK) Limited
Investment Managers	State Street Global Advisors Limited Waverton Investment Management Limited

## Summary of Results

Fund	Overall	Investment Performance	Comparable Market Rates	AFM Costs	Economies of Scale	Classes of Units/Shares	Comparable Services	Quality of Service
WS Sequel Balanced Target Return Strategy Fund*	●	●	●	●	●	●	●	●
WS Sequel Cautious Target Return Strategy Fund*	●	●	●	●	●	●	●	●
WS Sequel Growth Target Return Strategy Fund**	●	●	●	●	●	●	●	●
WS Sequel Real Assets Diversified Fund***	●	●	●	●	●	●	●	●
WS Sequel World Equity Fund****	●	●	●	●	●	●	●	●

Please refer to page 23 for explanation of ratings.

In this summary we have used the overall value rating for the representative (or most common) share class in the fund. Please refer to the individual fund page for the detailed rating and associated explanation for the fund and all its share classes.

It is important to note that different share classes charge different fees which will impact the performance return of the share class. The share class you hold will depend on how you invest in the fund(s).

\* On 16 October 2024, State Street Global Advisors replaced Momentum Global Investment Management as the Investment Manager of the WS Sequel Balanced Target Return Strategy Fund and WS Sequel Cautious Target Return Strategy Fund.

\*\* On 16 October 2024, Waverton Investment Management Limited replaced Momentum Global Investment Management as the Investment Manager of the WS Sequel Growth Target Return Strategy Fund.

\*\*\* This fund name changed from WS Sequel Cautious Income Strategy Fund to WS Sequel Real Assets Diversified Fund with effect from 12 May 2023. The investment objective and policy, benchmark and Investment Manager were also changed.

\*\*\*\* This fund name changed from WS Sequel Global Target Income Strategy Fund to WS Sequel World Equity Fund with effect from 12 May 2023. The investment objective and policy, benchmark and Investment Manager were also changed.



# Waystone Management (UK) Limited ('WMUK')

## Board of Directors

This Assessment of Value report has been approved by the WMUK Board of Directors. The Board is comprised of the Chair, who is one of three Independent Non-Executive Directors (iNED), plus four Executive Directors.

### Independent Non-Executive Directors



**Tim Madigan**

Independent Non-Executive Director and Chair of WMUK Board

Tim Madigan is the Independent Non-Executive Chairperson for WMUK and Waystone's regulated fund companies in Ireland (UCITS ManCo and AIFM) and Luxembourg (UCITS ManCo and AIFM). He serves as an iNED for a number of investment funds, both Irish-domiciled (UCITS and AIFs) and Luxembourg-domiciled (AIFs), as well as for an Irish cross-border life insurance company (where he also acts as chair of the Audit Committee). He was previously an iNED of a UK life insurance company (where he also acted as chair of the Risk & Compliance Committee).

From 2010 to 2011 Mr Madigan was Finance Director of Aviva Investment Management Europe, where he led the set-up of the finance function for Aviva Europe's Dublin-based centre of excellence, established to manage treasury assets and investment management mandates. Prior to this, Mr Madigan was Managing Director of cross-border life insurance company Aviva Life International from 2006 to 2010 (previously he was Finance Director for that company). In this role, he chaired the Investment Committee as well as leading a strategic review of business in 2009 following the onset of the global financial crisis.

He holds a Bachelor's Degree in Business Studies (Finance) from the University of Limerick, is a Fellow of the Association of Chartered Certified Accountants and is a Certified Investment Fund Director. He served as an elected council member of the Irish Fund Directors Association from 2016 to 2020.



**Elizabeth Tracey**

Independent Non-Executive Director

Elizabeth Tracey is an iNED for WMUK. Elizabeth brings to her role a wealth of expertise, having worked in the financial services industry for over 37 years, including senior operational roles at large asset management institutions, such as Merrill Lynch Investment Management and BlackRock Fund Managers.

Previously, Elizabeth was an iNED for Link Fund Solutions Limited, becoming an iNED to the Board in 2021. In addition, Elizabeth took on the role of Chair of the Link Fund Solutions Limited Risk, Compliance and Audit Committee.

Specialising in global operations, Elizabeth's experience includes oversight of projects in Europe, Asia, the US and Australia.



**Simon White**

Independent Non-Executive Director

Simon White is an experienced board member and senior executive with deep and varied finance industry experience, acquired during a career spanning more than 30 years.

Simon was appointed as an iNED of the Board of WMUK in February 2020. Simon has served as iNED for a number of public and private businesses and is currently an iNED for two substantial financial services firms.

Simon is the CEO and Managing Partner of Time Machine Capital Squared, an award-winning AI-focussed research and investment firm that specialises in artificial intelligence and machine learning. Simon previously served as COO (Chief Operating Officer) of Man Group and COO/CFO (Chief Financial Officer) of GLG Partners Inc, two of the most prominent alternative fund management companies globally. Throughout his career, Simon has been instrumental in building industry-leading infrastructure. In addition, Simon is a Fellow of the Institute of Chartered Accountants.

# Waystone Management (UK) Limited ('WMUK')

## Board of Directors continued

### Executive Directors



**Karl Midl**  
Country Head, UK and CEO WMUK

Karl Midl is an FCA approved professional with over 25 years of operational and client facing experience in the financial services sector. Karl joined Waystone in 2023 as part of its acquisition of Link Fund Solutions Limited where he had held the role of CEO. Karl joined Link Fund Solutions in 1995 and in 2002 became a Board member. Throughout his career, Karl has gained significant expertise in the administration and management of Collective Investment Schemes, both onshore and offshore and in all areas of operations, including fund accounting, pricing, transfer agency and projects.



**Vasileios Karalekas**  
European Head of Investment Risk

Vasileios joined Waystone in 2014 and serves as the company's Head of Investment Risk Management, overseeing the investment risk desks of the company's regulated entities in Ireland, Luxembourg, and the UK. Vasileios is responsible for the implementation of best-in-class risk management models and practices and compliance with the latest regulatory guidelines. With over 10 years of experience working within the financial sector, Vasileios' interests and experience span both asset classes and strategies and include the valuation and risk modelling of derivatives, structured credit, liquid asset strategies and alternative assets, such as loan origination and real estate.



**Andrew Berry**  
Executive Director

Andrew has over 33 years of experience in accounting and financial services, working in retail funds, fund platforms, fund accounting, administration, and investment oversight. Andrew joined Waystone in October 2019 as part of the acquisition of Host Capital Ltd. Based in London, Andrew is Head of ACD Governance and assists the Senior Management Group in the management of ongoing and large-scale operational deliverables covering the ACD, Operator and AIFM responsibilities for the firm's funds and pension products. Prior to joining Host Capital, Andrew was Associate Director at DST Systems (formerly IFDS), the UK's largest transfer agent. Andrew has also held positions at Bank of New York Mellon and Cofunds Ltd. Andrew is IAQ qualified, and his previous roles have involved the set up and operation of UK ACD/Alternative Fund Manager Companies.



**Rachel Wheeler**  
Global Product Head, Regulated Fund Solutions

Rachel is responsible for overseeing the development, management and growth of our regulated fund solutions business. This encompasses the management companies and MiFID (Markets in Financial Instruments Directive) businesses.

Trained as a fund lawyer, Rachel has gained over 25 years of experience in asset management. Her extensive career includes serving as the Group General Counsel for Aviva Investors and GAM Investments. Rachel has also held senior positions in the legal teams of USS Investment Management, The Bank of New York Mellon, Gartmore Investment Management and Merrill Lynch Investment Management.

Rachel holds a postgraduate diploma in Law and the Legal Practice Course from the College of Law, Guildford, and a BA (Hons) in History from the University of Wales.



# Individual Fund Summaries





# WS Sequel Balanced Target Return Strategy Fund

## Overall Rating



Investment Performance



Comparable Market Rates



AFM Costs



Economies of Scale



Classes of Units/Shares



Comparable Services



Quality of Service



Our annual assessment has concluded that the Fund offers overall value to investors. The majority of the criteria assessed were rated Green. Where appropriate, any areas of concern will be closely monitored.

Investment Manager	State Street Global Advisors Limited
Assets Under Management (AUM)	£49,215,128
Fund Launch Date	06 October 2013
Recommended Holding Period (RHP)	5 years
IA Sector	Mixed Investment 40–85% Shares
Target Benchmark	BoE 1yr Fixed Rate Bond +3.5%
Investment Objective	The investment objective of the Fund is to provide a balance of income and capital growth (net of fees) over any five-year rolling cycle of 3.5% per annum in excess of the return that could be expected from long-term cash deposits, represented by the Bank of England 1 Year Fixed Rate Bond IUMWTFA.

**Actions carried forward from 2023 Assessment** – Discussions have commenced with the sponsor regarding an appropriate peer group.

**Resolution of 2023 Actions** – A new peer group has been agreed with the IMD for the purposes of the assessment of costs and has been applied to the current assessment.

**Proposed actions arising from 2024 Assessment** – No actions proposed.

# WS Sequel Balanced Target Return Strategy Fund continued

## Investment Performance

Over its RHP, the Fund has delivered income above the sector yield and achieved capital growth of 4.52%. However, it has underperformed its target benchmark by 1.33%. We note that the bulk of this underperformance arose in 2022 when inflation was at exceptionally high levels. Since then we have seen an improvement in short-term performance. Therefore, while the Fund has been rated Amber for Investment Performance, we do not recommend any actions at this time.

### Annualised Performance – Periods to 31 December 2024

	12 Months	3 Years	5 Years
Fund Return*	7.73%	2.20%	4.52%
BoE 1yr Fixed Rate Bond +3.5%	8.03%	7.13%	5.85%
Relative to BoE 1yr Fixed Rate Bond +3.5%	-0.31%	-4.93%	-1.33%

### Discrete Performance – Rolling 12-Month Periods

	31 Dec 2020	31 Dec 2021	31 Dec 2022	31 Dec 2023	31 Dec 2024
Fund Return*	5.64%	10.61%	-6.54%	6.02%	7.73%
BoE 1yr Fixed Rate Bond +3.5%	4.13%	3.77%	5.15%	8.24%	8.03%
Relative to BoE 1yr Fixed Rate Bond +3.5%	1.51%	6.84%	-11.70%	-2.22%	-0.31%

\* While we have assessed performance across all share classes, for the purposes of reporting we have used Retail.

### Fund Income – Rolling 12-Month Periods

	31 Dec 2020	31 Dec 2021	31 Dec 2022	31 Dec 2023	31 Dec 2024
Fund Yield	2.27%	2.03%	2.17%	2.70%	2.62%
Fund Income (pence per share)	0.032	0.032	0.032	0.042	0.044

## Comparable Market Rates

Our review has evidenced that the share classes' OCFs (net of synthetic charges) are broadly comparable to their peer group median values.

We have considered the Fund's distribution model and note that it has been designed for, and is only distributed to, investors who have a relationship with the sponsor or its related financial advisers.

	Institutional Shares	Retail Shares	Standard C Shares
Share Class OCF*	1.40%	1.60%	1.04%
Peer Group Median OCF	1.01%	1.01%	1.01%

	Standard E Shares	Standard G Shares	Standard I Shares
Share Class OCF*	2.10%	2.35%	2.60%
Peer Group Median OCF	1.61%	1.61%	1.61%

\* Included within each share class's OCF is a synthetic charge from the Fund's underlying assets of 0.44%.

## AFM Costs

The Fund and its share classes' AMCs are broadly comparable to their peer group median values.

When assessing this cost we have included Investment Manager and Investment Advisor fees.

# WS Sequel Balanced Target Return Strategy Fund continued

## Economies of Scale ●

We are comfortable that the Fund has benefitted from economies of scale both due to its size and access to the fee arrangement in place with the ACD.

## Classes of Units/Shares ●

Our review has evidenced that all investors are in the most appropriate share class. Share classes assessed:

- Institutional share class
- Retail: a clean retail share class
- Standard C: a restricted sponsor share class
- Class E, G and I: legacy retail share classes

## Comparable Services ●

Based on our assessment, we are satisfied that all charges passed to the Fund are appropriate when considered in the context of comparable funds within the AFM.

## Quality of Service ●

This review considers the range and quality of all services provided to the Fund(s) and its unit/shareholders. We have identified, considered, and then assessed the service provided utilising any relevant reporting, key performance indicators ("KPIs") and due diligence that has been undertaken over the past 12 months.

Investment Process – WMUK has put the IMD's process through its quality of service assessment and concluded that it adheres to all the criteria set out in our Assessment of Value framework. In particular, the Fund demonstrates stability in the investment team; a strong change and governance process around its use of data and systems; relevancy, and robustness at each phase of the investment process; and has evidenced that it adheres to its Prospectus and integrated risk management procedures. The portfolio's liquidity is regularly assessed, and stress tested, and no concerns have been identified. Finally, due diligence has recently been conducted on the IMD and there were no material findings.

Governance Process – Our assessment of the ACD, and key service providers and delegates, namely but not limited to the Depositary, ACD, Fund Accounting, Transfer Agency, as well as their related oversight processes, raised no material concerns. For the first time, we have considered key Consumer Duty deliverables and assessed these, in particular investor feedback via complaints, and failure to deliver good service around Consumer Support and Consumer Understanding and have concluded that all of the above were met for the period.



# WS Sequel Cautious Target Return Strategy Fund

## Overall Rating



Investment Performance



Comparable Market Rates



AFM Costs



Economies of Scale



Classes of Units/Shares



Comparable Services



Quality of Service



Our annual assessment has concluded that the Fund offers overall value to investors. The majority of the criteria assessed were rated Green. Where appropriate, any areas of concern will be closely monitored.

Investment Manager	State Street Global Advisors Limited
Assets Under Management (AUM)	£74,489,940
Fund Launch Date	06 October 2013
Recommended Holding Period (RHP)	5 years
IA Sector	Mixed Investment 20–60% Shares
Target Benchmark	BoE 1yr Fixed Rate Bond +2%
Investment Objective	The investment objective of the Fund is to achieve total returns (a combination of income and capital growth, net of charges) over any five-year rolling cycle of 2% in excess of the return that could be expected from long-term cash deposits, represented by the Bank of England 1 Year Fixed Rate Bond IUMWTFA.

**Actions carried forward from 2023 Assessment** – Discussions have commenced with the sponsor regarding an appropriate peer group.

**Resolution of 2023 Actions** – A new peer group has been agreed with the IMD for the purposes of the assessment of costs and has been applied to the current assessment.

**Proposed actions arising from 2024 Assessment** – No actions proposed.

# WS Sequel Cautious Target Return Strategy Fund continued

## Investment Performance

Over its RHP, the Fund has achieved a total return of 3.55% but has underperformed its target benchmark by 0.77%. The bulk of this underperformance arose in 2022 when inflation was at exceptionally high levels. Since then, we have seen an improvement in short-term performance. Therefore, while the Fund has been rated Amber for Investment Performance, we do not recommend any actions at this time.

### Annualised Performance – Periods to 31 December 2024

	12 Months	3 Years	5 Years
Fund Return*	5.04%	1.24%	3.55%
BoE 1yr Fixed Rate Bond +2%	6.47%	5.58%	4.31%
Relative to BoE 1yr Fixed Rate Bond +2%	-1.42%	-4.34%	-0.77%

### Discrete Performance – Rolling 12-Month Periods

	31 Dec 2020	31 Dec 2021	31 Dec 2022	31 Dec 2023	31 Dec 2024
Fund Return*	5.33%	8.91%	-5.40%	4.43%	5.04%
BoE 1yr Fixed Rate Bond +2%	2.62%	2.26%	3.63%	6.67%	6.47%
Relative to BoE 1yr Fixed Rate Bond +2%	2.71%	6.65%	-9.03%	-2.24%	-1.42%

\* While we have assessed performance across all share classes, for the purposes of reporting we have used Retail (B Acc).

## Comparable Market Rates

Our review has evidenced that the share classes' OCFs (net of synthetic charges) are broadly comparable to their peer group median values.

We have considered the Fund's distribution model and note that it has been designed for, and is only distributed to, investors who have a relationship with the sponsor or its related financial advisers.

	Institutional Shares	Retail Shares	Standard C Shares	Standard D Shares
Share Class OCF*	1.31%	1.51%	0.95%	1.76%

Peer Group Median OCF	0.96%	0.96%	0.96%	1.50%
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	Standard E Shares	Standard G Shares	Standard I Shares
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Share Class OCF*	2.01%	2.26%	2.51%
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Peer Group Median OCF	1.50%	1.50%	1.50%
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\* Included within each share class's OCF is a synthetic charge from the Fund's underlying assets of 0.37%.

## AFM Costs

The Fund and its share classes' AMCs are broadly comparable to their peer group median values.

When assessing this cost we have included the Investment Manager's and Investment Advisor's fees.

## Economies of Scale

We are comfortable that the Fund has benefitted from economies of scale both due to its size and access to the fee arrangement in place with the ACD.

# WS Sequel Cautious Target Return Strategy Fund continued

## Classes of Units/Shares ●

Our review has evidenced that all investors are in the most appropriate share class.  
Share classes assessed:

- Institutional share class
- Retail: a clean retail share class
- Standard C: a restricted sponsor share class
- Class D, E, G and I: legacy retail share classes

## Comparable Services ●

Based on our assessment, we are satisfied that all charges passed to the Fund are appropriate when considered in the context of comparable funds within the AFM.

## Quality of Service ●

This review considers the range and quality of all services provided to the Fund(s) and its unit/shareholders. We have identified, considered, and then assessed the service provided utilising any relevant reporting, key performance indicators ("KPIs") and due diligence that has been undertaken over the past 12 months.

Investment Process – WMUK has put the IMD's process through its quality of service assessment and concluded that it adheres to all the criteria set out in our Assessment of Value framework. In particular, the Fund demonstrates stability in the investment team; a strong change and governance process around its use of data and systems; relevancy, and robustness at each phase of the investment process; and has evidenced that it adheres to its Prospectus and integrated risk management procedures. The portfolio's liquidity is regularly assessed, and stress tested, and no concerns have been identified. Finally, due diligence has recently been conducted on the IMD and there were no material findings.

Governance Process – Our assessment of the ACD, and key service providers and delegates, namely but not limited to the Depositary, ACD, Fund Accounting, Transfer Agency, as well as their related oversight processes, raised no material concerns. For the first time, we have considered key Consumer Duty deliverables and assessed these, in particular investor feedback via complaints, and failure to deliver good service around Consumer Support and Consumer Understanding and have concluded that all of the above were met for the period.



# WS Sequel Growth Target Return Strategy Fund

## Overall Rating



Investment Performance



Comparable Market Rates



AFM Costs



Economies of Scale



Classes of Units/Shares



Comparable Services



Quality of Service



Our annual assessment has concluded that the Fund offers overall value to investors. Some areas of concern have been identified and will be closely monitored. The Fund has been rated Amber overall.

Investment Manager	Waverton Investment Management Limited
Assets Under Management (AUM)	£43,288,796
Fund Launch Date	06 October 2013
Recommended Holding Period (RHP)	5 years
IA Sector	Flexible Investment
Target Benchmark	BoE 1yr Fixed Rate Bond +5%
Investment Objective	The investment objective of the Fund is to provide capital growth (net of fees) over any five-year rolling cycle of 5% per annum over the return that could be expected from long-term cash deposits, represented by the Bank of England 1 Year Fixed Rate Bond IUMWTFA.

**Actions carried forward from 2023 Assessment** – We will liaise closely with the IMD to ensure that short-term performance continues to improve. Discussions have commenced with the sponsor regarding an appropriate peer group.

**Resolution of 2023 Actions** – The Fund Manager changed from Momentum to Waverton in October 2024. We have seen an improvement in short-term performance. A new peer group has been agreed with the IMD for the purposes of the assessment of costs and has been applied to the current assessment.

**Proposed actions arising from 2024 Assessment** – No actions proposed.

# WS Sequel Growth Target Return Strategy Fund continued

## Investment Performance ●

Over its RHP, the Fund has achieved capital growth of 3.72% but has underperformed its target benchmark by 3.67%. The bulk of this underperformance arose in 2022 when inflation was at exceptionally high levels. Since then, we have seen an improvement in short-term performance. In addition, the Investment Manager of the Fund changed to Waverton Investment Management on 16 October 2024. Whilst the Fund has been rated Red for Investment Performance, due to the change in Investment Manager and the improvement in short-term performance, we do not recommend any actions at this time.

### Annualised Performance – Periods to 31 December 2024

	12 Months	3 Years	5 Years
Fund Return*	7.80%	1.37%	3.72%
BoE 1yr Fixed Rate Bond +5%	9.60%	8.69%	7.38%
Relative to BoE 1yr Fixed Rate Bond +5%	-1.80%	-7.32%	-3.67%

### Discrete Performance – Rolling 12-Month Periods

	31 Dec 2020	31 Dec 2021	31 Dec 2022	31 Dec 2023	31 Dec 2024
Fund Return*	2.53%	12.37%	-9.66%	6.95%	7.80%
BoE 1yr Fixed Rate Bond +5%	5.64%	5.27%	6.68%	9.81%	9.60%
Relative to BoE 1yr Fixed Rate Bond +5%	-3.10%	7.11%	-16.33%	-2.86%	-1.80%

\* While we have assessed performance across all share classes, for the purposes of reporting we have used Retail (B Acc).

## Comparable Market Rates ●

Our review has evidenced that the share classes' OCFs are mostly higher than their peer group median values.

We have considered the Fund's distribution model and note that it has been designed for, and is only distributed to, investors who have a relationship with the sponsor or its related financial advisers.

We do not recommend any action at this time.

	Institutional Shares	Retail Shares	Standard C Shares
Share Class OCF	1.08%	1.33%	0.77%
Peer Group Median OCF	1.02%	1.02%	1.02%

	Standard E Shares	Standard G Shares	Standard I Shares
Share Class OCF	1.83%	2.08%	2.33%
Peer Group Median OCF	1.56%	1.56%	1.56%

## AFM Costs ●

The Fund and its share classes' AMCs are broadly comparable to their peer group median values.

When assessing this cost we have included the Investment Manager's and Investment Advisor's fees.

## Economies of Scale ●

We are comfortable that the Fund has benefitted from economies of scale both due to its size and access to the fee arrangement in place with the ACD.

# WS Sequel Growth Target Return Strategy Fund continued

## Classes of Units/Shares

Our review has evidenced that all investors are in the most appropriate share class.  
Share classes assessed:

- Institutional share class
- Retail: a clean retail share class
- Standard C: a restricted sponsor share class
- Class E, G and I: legacy retail share classes

## Comparable Services

Based on our assessment, we are satisfied that all charges passed to the Fund are appropriate when considered in the context of comparable funds within the AFM.

## Quality of Service

This review considers the range and quality of all services provided to the Fund(s) and its unit/shareholders. We have identified, considered, and then assessed the service provided utilising any relevant reporting, key performance indicators ("KPIs") and due diligence that has been undertaken over the past 12 months.

Investment Process – WMUK has put the IMD's process through its quality of service assessment and concluded that it adheres to all the criteria set out in our Assessment of Value framework. In particular, the Fund demonstrates stability in the investment team; a strong change and governance process around its use of data and systems; relevancy, and robustness at each phase of the investment process; and has evidenced that it adheres to its Prospectus and integrated risk management procedures. The portfolio's liquidity is regularly assessed, and stress tested, and no concerns have been identified. Finally, due diligence has recently been conducted on the IMD and there were no material findings.

Governance Process – Our assessment of the ACD, and key service providers and delegates, namely but not limited to the Depositary, ACD, Fund Accounting, Transfer Agency, as well as their related oversight processes, raised no material concerns. For the first time, we have considered key Consumer Duty deliverables and assessed these, in particular investor feedback via complaints, and failure to deliver good service around Consumer Support and Consumer Understanding and have concluded that all of the above were met for the period.



# WS Sequel Real Assets Diversified Fund

## Overall Rating



- Investment Performance
- Comparable Market Rates
- AFM Costs
- Economies of Scale
- Classes of Units/Shares
- Comparable Services
- Quality of Service



Our annual assessment has concluded that the Fund offers overall value to investors. The majority of the criteria assessed were rated Green. Where appropriate, any areas of concern will be closely monitored.

Investment Manager	State Street Global Advisors Limited
Assets Under Management (AUM)	£40,355,662
Fund Launch Date	18 September 2006
Recommended Holding Period (RHP)	5 to 7 years
IA Sector	Mixed Investment 20–60% Shares
Target Benchmark	Elston Strategic Real Assets Index*
Investment Objective	The Fund aims to provide a total return in excess of the Elston Strategic Real Assets Index (the “target benchmark”) after fees and expenses are applied over the medium to long term, being five to seven years.

\* The benchmark changed from BofE 1 Year Fixed Rate Bond +2% on 12 May 2023.

**Actions carried forward from 2023 Assessment** – Discussions have commenced with the sponsor regarding an appropriate peer group.

**Resolution of 2023 Actions** – A new peer group has been agreed with the IMD for the purposes of the assessment of costs and has been applied to the current assessment.

**Proposed actions arising from 2024 Assessment** – We are engaged in discussions with the sponsor regarding the overall Fund costs and distribution strategy.

# WS Sequel Real Assets Diversified Fund continued

## Investment Performance

In May 2023, the Fund was repurposed with a change to its name, investment objective, strategy, and benchmark. Since the changes, the Fund has achieved an annualised total return of 4.74%. Despite this positive return, it has underperformed its target benchmark by 0.67%. The Fund has been rated Amber for Investment Performance; however, we note that it is too soon to fully assess the Fund against its objective.

The table below shows the historic performance of the Fund, combining the returns of the old strategy with that of the new repurposed Fund. The twelve months and 12 May 2023–31 December 2024 periods show the returns of the new strategy in isolation.

Annualised Performance – Periods to 31 December 2024

	12 Months	12 May 2023 to 31 Dec 2024	5 Years	7 Years
Fund Return *	5.37%	<b>4.74%</b>	2.90%	1.46%
Elston Strategic Real Assets Index**	5.87%	<b>5.41%</b>	3.87%	3.61%
Relative to Elston Strategic Real Assets Index**	-0.50%	<b>-0.67%</b>	-0.97%	-2.14%

Discrete Performance – Rolling 12-Month Periods

	31 Dec 2020	31 Dec 2021	31 Dec 2022	31 Dec 2023	31 Dec 2024
Fund Return *	4.09%	8.13%	-5.53%	2.95%	5.37%
Elston Strategic Real Assets Index**	2.62%	2.26%	3.63%	5.02%	5.87%
Relative to Elston Strategic Real Assets Index**	1.48%	5.87%	-9.16%	-2.07%	-0.50%

\* While we have assessed performance across all share classes, for the purposes of reporting we have used Retail (B Acc).

\*\* Performance is measured against BofE 1 Year Fixed Rate Bond +2% to 12 May 2023 and against Elston Strategic Reals Assets Index after this date.

## Comparable Market Rates

Our review has evidenced that the share classes' OCFs (net of synthetic charges) are mostly comparable to their peer group median values.

It is worth noting that, due to the small size of the Fund, certain fixed costs, in particular licensing fees, have a disproportionate impact on the OCF.

We have considered the Fund's distribution model and note that it has been designed for, and is primarily distributed to, investors who have a relationship with the sponsor or its related financial advisers.

We do not recommend any action at this time.

	C Shares	Institutional Shares	Retail Shares
Share Class OCF*	1.03%	1.28%	1.48%
Peer Group Median OCF	0.89%	0.89%	0.89%

\* Included within each share class's OCF is a synthetic charge from the Fund's underlying assets of 0.28%.

## AFM Costs

The Fund and its share classes' AMCs are broadly comparable to their peer group median values.

When assessing this cost we have included the Investment Manager's and Investment Advisor's fees.

## Economies of Scale

We are comfortable that the Fund has benefitted from economies of scale due to its access to the fee arrangement in place with the ACD.

## Classes of Units/Shares

Our review has evidenced that all investors are in the most appropriate share class. Share classes assessed:

- Institutional share class
- Retail: a clean retail share class
- Standard C: a restricted sponsor share class

# WS Sequel Real Assets Diversified Fund continued

## Comparable Services

Based on our assessment, we are satisfied that all charges passed to the Fund are appropriate when considered in the context of comparable funds within the AFM.

## Quality of Service

This review considers the range and quality of all services provided to the Fund(s) and its unit/shareholders. We have identified, considered, and then assessed the service provided utilising any relevant reporting, key performance indicators ("KPIs") and due diligence that has been undertaken over the past 12 months.

Investment Process – WMUK has put the IMD's process through its quality of service assessment and concluded that it adheres to all the criteria set out in our Assessment of Value framework. In particular, the Fund demonstrates stability in the investment team; a strong change and governance process around its use of data and systems; relevancy, and robustness at each phase of the investment process; and has evidenced that it adheres to its Prospectus and integrated risk management procedures. The portfolio's liquidity is regularly assessed, and stress tested, and no concerns have been identified. Finally, due diligence has recently been conducted on the IMD and there were no material findings.

Governance Process – Our assessment of the ACD, and key service providers and delegates, namely but not limited to the Depositary, ACD, Fund Accounting, Transfer Agency, as well as their related oversight processes, raised no material concerns. For the first time, we have considered key Consumer Duty deliverables and assessed these, in particular investor feedback via complaints, and failure to deliver good service around Consumer Support and Consumer Understanding and have concluded that all of the above were met for the period.



# WS Sequel World Equity Fund

## Overall Rating



- Investment Performance 
- Comparable Market Rates 
- AFM Costs 
- Economies of Scale 
- Classes of Units/Shares 
- Comparable Services 
- Quality of Service 

Our annual assessment has concluded that the Fund offers overall value to investors. Some areas of concern have been identified and will be closely monitored. The Fund has been rated Green overall.

Investment Manager	State Street Global Advisors Limited
Assets Under Management (AUM)	£38,225,072
Fund Launch Date	18 September 2006
Recommended Holding Period (RHP)	5 to 7 years
IA Sector	Global
Target Benchmark	Elston World Equity Equal Sector Weight Index*
Investment Objective	The Fund aims to provide a total return in excess of the Elston World Equity Equal Sector Weight Index (the “target benchmark”) after fees and expenses are applied over the medium to long term, being five to seven years.

\* The benchmark changed from BofE 1 Year Fixed Rate Bond +5% on 12 May 2023.

**Actions carried forward from 2023 Assessment** – Discussions have commenced with the sponsor regarding an appropriate peer group.

**Resolution of 2023 Actions** – A new peer group has been agreed with the IMD for the purposes of the assessment of costs and has been applied to the current assessment.

**Proposed actions arising from 2024 Assessment** – We are engaged in discussions with the sponsor regarding the overall Fund costs and distribution strategy.

# WS Sequel World Equity Fund continued

## Investment Performance

In May 2023, the Fund was repurposed with a change to its name, investment objective, strategy, and benchmark. Since the changes, the Fund has achieved an annualised total return of 12.23%. Despite this strong return, it has underperformed its target benchmark by 2.45%. The Fund has been rated Amber for Investment Performance; however, we note that it is too soon to fully assess the Fund against its objective.

The table below shows the historic performance of the Fund, combining the returns of the old strategy with that of the new repurposed Fund. The twelve months and 12 May 2023–31 December 2024 periods show the returns of the new strategy in isolation. In the twelve months to 31 December 2024, the Fund outperformed its target benchmark by 0.56%.

Annualised Performance – Periods to 31 December 2024

	12 Months	12 May 2023 to 31 Dec 2024	5 Years	7 Years
Fund Return*	15.64%	<b>12.23%</b>	3.89%	2.39%
Elston World Equity Equal Sector Weight Index**	15.07%	<b>14.68%</b>	8.89%	8.05%
Relative to Elston World Equity Equal Sector Weight Index**	0.56%	<b>-2.45%</b>	-4.99%	-5.66%

Discrete Performance – Rolling 12-Month Periods

	31 Dec 2020	31 Dec 2021	31 Dec 2022	31 Dec 2023	31 Dec 2024
Fund Return*	0.59%	10.20%	-11.39%	6.57%	15.64%
Elston World Equity Equal Sector Weight Index**	5.64%	5.27%	6.68%	12.13%	15.07%
Relative to Elston World Equity Equal Sector Weight Index**	-5.05%	4.93%	-18.07%	-5.56%	0.56%

\* While we have assessed performance across all share classes, for the purposes of reporting we have used Retail Accumulation.

\*\* Performance is measured against BofE 1 Year Fixed Rate Bond +5% up to 12 May 2023 and against Elston World Equity Equal Sector Weight Index after this date.

## Comparable Market Rates

Our review has evidenced that the share classes' OCFs (net of synthetic charges) are mostly comparable to their peer group median values.

It is worth noting that, due to the small size of the Fund, certain fixed costs, in particular licensing fees, have a disproportionate impact on the OCF.

We have considered the Fund's distribution model and note that it has been designed for, and is primarily distributed to, investors who have a relationship with the sponsor or its related financial advisers.

	C Shares	Institutional Shares	Retail Shares
Share Class OCF*	1.06%	1.31%	1.51%
Peer Group Median OCF	0.85%	0.85%	0.85%

\* Included within each share class's OCF is a synthetic charge from the Fund's underlying assets of 0.30%.

## AFM Costs

The Fund and its share classes' AMCs are broadly comparable to their peer group median values.

When assessing this cost we have included the Investment Manager's and Investment Advisor's fees.

## Economies of Scale

We are comfortable that the Fund has benefitted from economies of scale due to its access to the fee arrangement in place with the ACD.

## Classes of Units/Shares

Our review has evidenced that all investors are in the most appropriate share class. Share classes assessed:

- Institutional share class
- Retail: a clean retail share class
- Standard C: a restricted sponsor share class

# WS Sequel World Equity Fund continued

## Comparable Services

Based on our assessment, we are satisfied that all charges passed to the Fund are appropriate when considered in the context of comparable funds within the AFM.

## Quality of Service

This review considers the range and quality of all services provided to the Fund(s) and its unit/shareholders. We have identified, considered, and then assessed the service provided utilising any relevant reporting, key performance indicators ("KPIs") and due diligence that has been undertaken over the past 12 months.

Investment Process – WMUK has put the IMD's process through its quality of service assessment and concluded that it adheres to all the criteria set out in our Assessment of Value framework. In particular, the Fund demonstrates stability in the investment team; a strong change and governance process around its use of data and systems; relevancy, and robustness at each phase of the investment process; and has evidenced that it adheres to its Prospectus and integrated risk management procedures. The portfolio's liquidity is regularly assessed, and stress tested, and no concerns have been identified. Finally, due diligence has recently been conducted on the IMD and there were no material findings.

Governance Process – Our assessment of the ACD, and key service providers and delegates, namely but not limited to the Depositary, ACD, Fund Accounting, Transfer Agency, as well as their related oversight processes, raised no material concerns. For the first time, we have considered key Consumer Duty deliverables and assessed these, in particular investor feedback via complaints, and failure to deliver good service around Consumer Support and Consumer Understanding and have concluded that all of the above were met for the period.





# Our Value Assessment Process



# Our Value Assessment Process

## Introduction

This is the fifth year of the Assessment of Value and, since its establishment, our process has evolved and matured to reflect industry best practice, as well as revised guidance from the FCA. Our framework, which underpins the Assessment of Value process, is reviewed and enhanced on an annual basis, with the intention of providing greater clarity to you, the end investor, and to ensure appropriateness and relevancy.

Our Assessment of Value applies a combination of quantitative and qualitative metrics to assess whether funds provide value to our investors. The FCA has set out seven key assessment criteria, which we've explained in full on page 24, but it also notes that there may be 'Other' appropriate assessment factors. Our assessment considers if any additional criteria should be assessed. In particular, we are starting to focus on the ESG impact to the investment process. Where ESG forms part of a fund's objective and/or policy, the assessment is included in the Investment Performance section. However, where the Investment Manager has identified ESG priorities, even if they are not part of the investment objective but a clear part of their investment process, these are also monitored against the IMD's policies or guidelines through the Quality of Service assessment.

We employ a robust governance and risk management framework in our oversight and monitoring process. This includes the funds, the various third parties – investment managers and administrators – and our performance as ACD/AIFM, by considering the service provided by the internal teams within WMUK. Part of this governance assessment are the regular reviews to ensure we are familiar with the administration, investment and product processes. We utilise Key Performance Indicators and Service Level Agreements where appropriate. All of this helps us to identify any potential issues that may cause detriment to the funds or the investors.

Where appropriate and relevant to our assessment, we comment on events that have occurred outside of the investment reporting period to 31 December 2024.

## Ratings





There are two key pieces of information you need to know when reviewing the report: firstly your fund name and secondly, the share class in which you invest. Our ratings process has not changed and, in line with previous years, an overall rating is determined for each fund and share class using a simple four-colour traffic light system. However, while we rely heavily on metrics to assess the funds, in some cases the Board applies a subjective adjustment to the ratings to ensure that they appropriately reflect the fund's assessment. In addition, we will use the commentary in each of the criteria to identify anything which might be of interest to the investors.

A rating is given for each of the seven criteria, and these form the basis of the overall fund rating. This overall rating is calculated using metrics agreed by the WMUK Board, with some criteria having a greater weighting than others.

For newly launched funds, whilst we assess them, we may rate them differently. Where there is a performance history of less than one year or if there has been a material change to the fund's investment objective and/or policy, we may assign a grey rating as it is too soon to rate the fund.

Likewise in relation to costs, we recognise that newly launched funds are still in their growth stage and can experience higher fixed costs. If a fund has launched within three years of the reporting period, we may assign a grey rating, indicating that it is too soon to rate it for costs.

Our summary page shows a rating for all funds assessed for the reporting period to 31 December 2024.

-  Offers value to investors
-  Has provided value in some but not all areas; additional monitoring and/or further action may be proposed
-  Has not provided value; appropriate further action will be agreed and addressed
-  Too soon to measure. Fund has been live for less than 1 year (for performance)/3 years (for costs) or has had a material change to its investment objective, policy or benchmark during that period

To provide as independent an assessment process as possible we:

- rely on a framework which, while evolving, uses a consistent assessment methodology which has been challenged and approved by our three iNEDs.
- use independent data from Fitz Partners and Morningstar, allowing us to assess the funds' costs and performance on an arm's length basis using externally sourced and validated information.
- use, where documented, the fund benchmarks identified in the Prospectus.

Where any of the criteria assessed results in an Amber or Red rating, any proposed remedial action(s) will be displayed in the individual fund summaries from page 6.

# Our Value Assessment Process continued

## FCA Criteria and What This Means

In carrying out the Assessment of Value, the AFM must consider the seven criteria set out by the FCA plus any additional factors which are considered relevant to a fair assessment. These are further detailed below.

### Fund Performance

The performance of the fund, after deduction of all payments out of scheme property, as set out in the Prospectus. Performance should be considered over an appropriate timescale (usually the RHP stated in the Prospectus) having regard to the fund's investment objectives, policy and strategy.

### Classes of Units/Shares

Whether it is appropriate for unit/shareholders to hold units/shares in classes subject to higher charges than those applying to other classes of the same scheme with substantially similar rights.

### Comparable Market Rates

In relation to each service, the market rate for any comparable service provided by the AFM, or to the AFM or on its behalf, including by a person to which any aspect of the fund's management has been delegated.

### Comparable Services\*

In relation to each separate charge, the AFM's charges and those of its associates for comparable services provided to clients, including for institutional mandates of a comparable size and having similar investment objectives and policies.

\* as Host or Independent ACD/AIFM, we are not expected to look at institutional mandates.

### AFM Costs

In relation to each charge, the cost of providing the service to which the charge relates and, when money is paid directly to associates or external parties, the cost is the amount paid to that person.

### Quality of Service

The range and quality of services provided to investors.

### Economies of Scale

Whether the AFM is able to achieve savings and benefits from economies of scale, relating to the direct and indirect costs of managing the scheme property, and taking into account the value of the scheme property and whether it has grown or contracted in size as a result of the sale and redemption of units/shares.

### Other

This includes any additional factors which we might consider on a case-by-case basis, e.g. ESG.

# Our Value Assessment Process continued

## Investment Performance

The below outlines how our Assessment of Value Framework interprets and measures each of the criteria. This is supported by key metrics which have been reviewed and agreed by the WMUK Board but we also want to draw your attention to the fact that there is an element of subjectivity through our assessment process.

When assessing the fund's performance, we consider two different assessments. These consider the performance in different ways over the fund's investment horizon (usually but not always five years), or since launch if it has not yet reached the investment horizon. Equally, if the fund has had a significant change to its investment objective or the appointment of a new investment manager, we may also show performance from this point. Should this be the case we will identify this appropriately. We assess the performance of all share classes but report on one. The share class being reported is clearly stated on the performance table in the individual fund summary.

- 1) **Absolute Performance** – this test assesses the main investment objective of the fund e.g. growth. While we rate the fund/share class over its investment horizon, attention is paid to performance over the past twelve months, or significant periods of over- or underperformance during the investment horizon which may have a material impact on the returns. In addition, some funds will have additional objectives or targets that are considered here e.g. income, volatility or ESG.
- 2) **Relative Performance** – this test compares the performance of the fund/share class against its target/comparator benchmark over rolling performance periods. So, for a fund/share class with a five-year investment horizon, where possible, we look at 10 years of performance history. We use this to determine on how many of these performance periods the fund has outperformed the benchmark, allowing us to measure the consistency of its performance. This considers how the fund/share class has performed against the wider market. Where a fund has not reached its investment horizon, and has insufficient periods to enable this assessment, we look at the annualised return of the fund versus the benchmark since inception. If a fund has more than one benchmark, we identify which has been used for assessment purposes. When we assess the performance of a fund, we have tolerance levels which means that a fund can underperform its target/comparator benchmark and still achieve a Green rating for Investment Performance. All benchmark returns shown are net total returns in GBP unless stated otherwise in the performance table of the individual fund summaries.

While we do not include investment style in our assessment, where we feel it is important in explaining the performance of a fund we will use the commentary section to draw your attention to this.

## Comparable Market Rates

To assess this we look at all the costs the fund pays, this is known as the Ongoing Charges Figure (OCF). The OCF is the total sum of the Annual Management Charge (AMC), Investment Manager, Registrar and other Direct Costs as identified in the Prospectus and found in the Key Investment Information Document (KIID). We compare the OCF at share class level against the relevant Investment Association sector or, where appropriate, peer group. The IA sectors organise groups of similar funds e.g. by geographic region or asset type. This might not be appropriate for all funds and, on some occasions, the ACD/AIFM Board will identify a suitable group of comparable funds – a peer group. We determine how the share class compares to the median of that sector or peer group. While we know that this comparison can be skewed by different investment approaches (e.g. passive fund of funds), we believe it provides a good indication of where the fund sits generally. We then consider if the OCF paid by the investor provides good value. We do not consider transaction costs or other indirect costs (e.g. synthetic fee) as part of this assessment.

## Authorised Fund Manager Costs

We compare the AMC of all share classes against what our investors would pay for holding a similar investment elsewhere in a fund with similar investment objectives and strategies. We recognise that certain asset classes such as property, infrastructure and private equity can be more expensive owing to additional costs associated with the investment process and asset level due diligence; these costs are also considered as part of our assessment.

## Economies of Scale

Our review is to ensure that investors benefit from economies of scale. There are two factors here. Firstly, does the fund benefit from economies as part of the wider negotiation powers of the ACD/AIFM, which it might not benefit from if it contracted directly with the provider? Secondly, has the fund benefitted from additional economies of scale as its assets under management (AuM) have increased, i.e. as the fund and share classes increase in size, have overall costs reduced? The Investment Manager's fees make up the majority of costs charged to the funds and, where appropriate, we discuss with them whether or not economies of scale can or have been achieved. On an ongoing basis, we strive to ensure that service, performance, and costs are in line with market best practice. Measures which we have in place to support this effort include:

- adopting a standard operating approach across all funds supported by each service delegate and using this to leverage economies of scale.
- employing an independent consultancy to provide regular benchmark data that compares service delivery for fund administration and custody against other clients of that service provider and against the whole of the market.
- periodically commissioning an analysis of services, fees and costs to ensure they remain competitive. In the past four years, this has included a review of custody fees at one of our major providers, a renegotiation of Trustee and Depositary fees and a full market review (costs and service capability) for the provision of Fund Administration services.

# Our Value Assessment Process continued

## Classes of Units/Shares

As part of our cost analysis, we seek to ensure that all investors are in the most appropriate share class. Where we identify that there is a cheaper, more appropriate share class available, we will transfer investors across within a reasonable time frame. Our assessment considers the fund's distribution model, target investors, and minimum investment amount. Where a fund has been designed for, and is only distributed to, a limited number of clients of the Investment Manager, we consider the higher costs associated with the additional services received by investors and ensure that they are of sufficient value. We note the recent and ongoing piece of work on share class conversions across our funds, i.e. moving investors to the cheapest available share class, providing better value for our directly registered investors (subject to share class minimums).

## Comparable Services

This is an internal assessment and compares the services provided to the fund against those we provide to other funds and different client types, e.g. segregated mandates. These should be comparable in terms of strategy, investment remit and investor outcome. As host/independent ACD/AIFM, we are not required to look at institutional mandates.

## Quality of Service

Here we aim to assess the range and quality of services provided to our investors and funds. This includes an evaluation of the services we, as AFM, provide to our investors. There are two significant elements here – investment process and governance process.

### Investment Process

Here, we engage directly with the Investment Manager Delegate's (IMD) investment team, to determine the quality and integrity of the IMD and their investment process, examining the following areas:

- regular due diligence of the IMD including their governance, data and systems, culture and conduct, human resources (particularly where there are critical employees) as well as their corporate and regulatory framework.
- the different phases of the investment processes and how they interact with each other.
- the IMD's investment strategies and their adherence to the Prospectus.
- the integration of risk management for global exposures, idiosyncratic and concentration risks.
- the relevancy and robustness of top-down and bottom-up phases as well as the quantitative and qualitative approaches embedded in those.
- Where ESG forms part of a fund's policy and/or objective, or is a fundamental part of the investment process, our assessment considers if the fund or the Investment Manager is adhering to the Prospectus and/or their ethical screening policy.

### Governance Process

We perform extensive oversight on all delegated service providers as part of a detailed Vendor Management Policy. This ensures that service quality is maintained in line with documented Service Level Agreements which, in turn, delivers service that meets or exceeds regulatory requirements. This includes a review of the following:

- ACD/AIFM – the ACD/AIFM Board is responsible for ensuring that the funds are run in the best interests of investors and, in evidencing that, we have effectively discharged our governance responsibilities.
- services provided by the Fund Administrator, in particular the accurate and timely pricing of the funds.
- client servicing, namely the services of the Transfer Agent and Registrar, in the delivery of contract notes and statements, income and redemption payments, etc.
- other providers including Depositary and Custodians.
- complaints, errors, breaches, and incidents.
- accessibility, accuracy, and use of plain language, in fund documentation, investor communications and the website.



# Glossary





# Glossary

## Absolute Return

The rise or fall in the value of an asset in a particular period of time, expressed as a percentage. This measure is expressed as a percentage and for time periods greater than 12 months is annualised.

## Accumulation Shares/Units

A share/unit class that retains any income within the share/unit class price. The income can be interest or dividends.

## Active Management

An approach to investing whereby capital is allocated according to the judgement of the investor or fund manager(s). The active investor aims to beat the returns from the stockmarket or specified benchmark index/sector, rather than to match them.

## Alternative Investment Fund Manager (AIFM)

The entity performing the investment management function and responsible for ensuring compliance with the Alternative Investment Fund Management Directive (AIFMD) regulations and is responsible for providing the legal, regulatory and risk management framework for the alternative investment funds through its oversight and governance process.

## Annual Management Charge (AMC)

A charge covering costs and fees that may be payable to the ACD and/or Investment Manager or Sponsor. These fees are usually (but not always) the cost of running the ACD and the investment management charges.

## Annualised Performance

The equivalent annual return an investor receives over a given period.

## Asset

Anything having commercial or exchange value that is owned by a business, institution, individual or government body.

## Asset Allocation

Allocating a portfolio's assets according to risk tolerance and investment goals.

## Asset Class

Category of assets, such as cash, company shares, fixed income securities (bonds) and their sub-categories, as well as tangible assets such as real estate.

## Assets Under Management (AUM)

The total market value of the assets, including investments of a fund.

## Authorised Corporate Director (ACD)

In Waystone Management (UK) Limited's (WMUK) capacity as Authorised Fund Manager we act as the ACD (Authorised Corporate Director) where we are responsible for providing the legal and regulatory framework for each fund through our extensive Product Governance process, Value Assessment, Risk Monitoring and Reporting.

## Authorised Fund Manager (AFM)

WMUK is an independent, regulated provider of AFM services for a range of UK regulated funds.

## Benchmark

Measure, such as an index or sector, against which a portfolio's performance is judged. The fund's benchmark must be disclosed in the Prospectus.

## Benchmark – Comparator

The fund managers choose the benchmark, which may be an index or a sector, as a comparator for the fund's performance, but they do not have to replicate its composition. The benchmark is not used for any other purpose, such as, for example, to serve as a reference when setting performance fees.

## Benchmark – Composite

A composite benchmark combines a number of different indices which may have different weights.

## Benchmark – Constraint

The portfolio must replicate the securities contained in the benchmark and their weights. The benchmark can be an index or a sector. Depending on the fund's mandate, the managers can replicate the positions directly or via derivatives, which are instruments whose value is derived from that of an underlying security or pool of securities.

## Benchmark – Proxy

An alternative benchmark which mimics the performance of the original benchmark.

## Benchmark – Target

A benchmark, such as an index or sector, which the fund managers aim to match or exceed. The managers have freedom in choosing the securities and strategy by which they do so.

## Bond

A loan in the form of a security, usually issued by a government or company. It normally pays a fixed rate of interest (also known as a coupon) over a given time period, at the end of which the initial amount borrowed is repaid.

## Capital

Refers to the financial assets, or resources, that a company has to fund its business operations.

## Capital at Risk

The risk an investor faces that he or she may lose all or part of the assets invested.

## Capital Growth

Occurs when the current value of an investment is greater than the initial amount invested.

## Capital Return

The term for the gain or loss derived from an investment over a particular period. Capital return includes only capital gain or loss, and excludes income (in the form of interest or dividend payments).

## Collective Investment Scheme (CIS)

Sometimes referred to as a 'pooled investment', it is a scheme where a fund manager will invest the pooled money in one or more types of asset, such as stocks, bonds or property.

## Consumer Prices Index (CPI)

An index used to measure inflation, or the rate at which prices for a basket of goods and services bought by households change. The contents of the basket are meant to be representative of products and services consumers typically spend money on, and are updated regularly.

## Cumulative Return

The aggregated return from an investment or fund over a specific time period.

# Glossary continued

## Custodian

A financial institution that holds customers' securities for safekeeping to prevent them from being stolen or lost.

## Debt Instrument

A formal contract that a government, a business or an individual can use to borrow money. Debt instruments outline the detailed conditions of the loan, such as the amount and schedule of payments of interest, the length of time before the principal is paid back, or any guarantees (collateral) that the borrower offers. Any type of debt can be a debt instrument – from bonds and loans to credit cards.

## Default

When a borrower does not maintain interest payments or repay the amount borrowed when due.

## Default Risk

Risk that a debtholder will not receive interest and full repayment of the loan when due.

## Depository

A depository is an independent third party that is responsible for the safekeeping of assets of an investment fund, performing the cash flow monitoring and the oversight duties of the fund.

## Derivatives

Financial instruments whose value and price depend on one or more underlying assets. Derivatives can be used to gain exposure to, or to help protect against, expected changes in the value of the underlying investments. Derivatives may be traded on a regulated exchange or directly between two parties (over the counter).

## Developed Economy/Market

Well-established economy with a high degree of industrialisation, standard of living and security.

## Discrete Performance

The percentage return on an investment over specific defined time periods.

## Distribution

Distributions represent a share in the income of the fund and are paid out to Income shareholders or retained in the price for Accumulation shareholders at set times of the year (monthly, quarterly, half-yearly or annually). They may be in the form of interest distributions or dividend distributions depending on the type of assets held in the funds.

## Distribution Yield

The amount that is expected to be distributed by the fund over the next 12 months expressed as a percentage of the share price as at a certain date. It is based on the expected gross income available for distribution, less the ongoing charges where they are deducted from income.

## Dividend

A share in the profits of a company, paid out to the company's shareholders at set times of the year.

## Dividend Yield

Annual income distributed by a company as a percentage of its share price as at a certain date.

## Drawdown

The decline in price from a historical peak value of an investment. It is a measurement of the maximum amount an investor could have lost since an investment was at its highest price.

## Economies of Scale

Savings in costs which can be achieved from an increase in production. For example, when a fund grows, it may experience economies of scale through a decrease in fixed costs when the impact in pound and pence fixed cost figures becomes smaller as a percentage of the total size of the fund.

## Emerging Economy or Market

Country in the process of catching up with developed economies, with rapid growth and increasing industrialisation. Investments in emerging markets are generally considered to be riskier than those in developed markets.

## Entry Charge

This is the maximum that might be taken out of your investment before the deal is placed in your specified fund(s).

## Exit Charge

The maximum charge that might be taken from your investment once your shares/units are sold.

## Equities

Shares of ownership in a company. They offer investors participation in the company's potential profits, but also the risk of losing all their investment if the company goes bankrupt.

## Exchange Traded

Usually refers to securities traded on an exchange, such as company shares on a stock exchange.

## Exchange-Traded Fund (ETF)

A type of fund that is traded on the stock market like ordinary shares. ETFs can be bought and sold throughout the day, like ordinary shares, whereas other types of funds are priced once a day only.

## Exposure

The proportion of a fund invested in a particular share/fixed income security/index, sector/region, usually expressed as a percentage of the overall fund.

## Financial Conduct Authority (FCA)

The body which regulates the financial services industry in the UK. Its role includes protecting consumers, keeping the industry stable and promoting healthy competition between financial service providers.

## Fixed Income Security

A loan in the form of a security, usually issued by a government or company, which normally pays a fixed rate of interest over a given time period, at the end of which the initial amount borrowed is repaid. Also referred to as a bond.

## Foreign Exchange

The conversion of one currency into another currency. Foreign exchange also refers to the global market where currencies are traded virtually around the clock. The term 'foreign exchange' is usually abbreviated as 'forex' and occasionally as 'FX'.

# Glossary continued

## Fund Administrator

The entity responsible for maintaining accurate records of a fund's transactions, holdings, and performance. They also prepare regulatory filings and provide other compliance-related support.

## Gilts

Fixed income securities issued by the UK Government. They are called gilts because they used to be issued on gilt-edged paper.

## Government Bonds

Loans issued in the form of fixed income securities by governments. They normally pay a fixed rate of interest over a given time period, at the end of which the initial investment is repaid.

## Hedging

A method of reducing unnecessary or unintended risk.

## High Net Worth Individual

A person or family with liquid assets above a certain figure.

## High Water Mark (HWM)

The highest level that a fund's NAV (net asset value) has reached at the end of any 12-month accounting period. The fund can usually charge a performance fee once its NAV exceeds this level.

## High Yield Bonds

Loans taken out in the form of fixed income securities issued by companies with a low credit rating from a recognised credit rating agency. They are considered to be at higher risk of default than better-quality, higher-rated fixed income securities, but they have the potential for higher rewards. Default means that a bond issuer is unable to meet interest payments or repay the initial amount borrowed at the end of a security's life.

## Historic Yield

The historic yield reflects distributions declared over the past 12 months as a percentage of the share price as at the date shown.

## Income

Money paid out by an investment. Dividends are income from shares. Income from bonds is called interest or coupon.

## Income Shares/Units

A type of share/unit where income is paid out as cash on the payment date. The income can be interest or dividends.

## Income Yield

Refers to the income received from an investment. Usually expressed annually as a percentage based on the investment's cost, its current market value or face value.

## Index

An index represents a particular market or a portion of it, serving as a performance indicator for that market or segment.

## Index Tracking

A fund management strategy that aims to replicate the holdings and the performance of a particular index. It is known as a passive investing strategy.

## Index-Linked Bonds

Fixed income securities where both the value of the loan and the interest payments are adjusted in line with inflation over the life of the security. Also referred to as inflation-linked bonds.

## Inflation

The rate of increase in the cost of living. Inflation is usually quoted as an annual percentage, comparing the average price this month with that of the same month a year earlier.

## Institutional Investor

An entity that trades for others, usually in large quantities.

## Institutional Mandate

Legal agreement between two parties such as a fund manager and a financial institution which outlines how a client fund will be managed.

## Intermediary

An individual or organisation which acts as a link between the investor and the fund: for example, a financial adviser or platform.

## Investment Association (IA)

The UK trade body that represents fund managers. It works with investment managers, liaising with government on matters of taxation and regulation, and also aims to help investors understand the industry and the investment options available to them.

## Investment Association (IA) Sector Median

The Investment Association (IA) classifies funds under different sectors according to their investment strategy. The median is the middle point of a set of data. The IA sector median for costs is calculated by ordering the OCF of all funds in a sector from lowest to highest and taking the middle OCF.

## Investment Grade Bonds

Fixed income securities issued by a government or company with a medium or high credit rating from a recognised credit rating agency. They are considered to be at lower risk of default than those issued by issuers with lower credit ratings. Default means that a borrower is unable to meet interest payments or repay the initial investment amount at the end of a security's life.

## Investment Manager Delegate (IMD)

The company or individual to whom the ACD delegates the responsibility for deciding how to invest the money in the fund's assets.

## Investment Objective

A high level description outlining the aim of the fund, for example "to achieve capital growth and income over the long term".

## Investment Trust

A form of closed-ended fund traded on the public markets. The number of shares in issue is fixed and the share price fluctuates either above or below the book value of the underlying assets.

## Issuer

An entity that sells securities such as fixed income securities and company shares.

## Key Performance Indicator (KPI)

Quantifiable measures used to assess the performance of a process.



# Glossary continued

## Liquidity

Refers to the ease of turning assets into cash when needed. A company's shares are considered highly liquid if they can be easily bought or sold, since they are regularly traded in high numbers.

## Long Position

Holding a security in the expectation that its value will rise.

## Maturity

The length of time until the initial amount invested in a fixed income security is due to be repaid to the holder of the security.

## Money Market Instruments

Debt due to be repaid within a year, in the form of securities that are bought and sold by institutional investors such as banks, pension funds, asset managers, etc. Individual investors need to go through an intermediary such as a bank or asset manager to invest in these instruments.

## Morningstar

A provider of independent investment research, including performance statistics and independent fund ratings.

## Near Cash

Deposits or investments with similar characteristics to cash.

## Net Asset Value (NAV)

The current value of the fund's assets minus its liabilities.

## Ongoing Charges Figure (OCF)

Ongoing charges are those expenses which are likely to recur in the foreseeable future, and which relate to the operation of the fund, excluding the costs of buying or selling of investments and financing charges. They can be charged to capital and/or income. Ongoing charges are based on costs incurred in the year as being the best estimate of future costs. The OCF is expressed as a percentage.

## Ongoing Charges Figure (OCF) – Capped

This is where the OCF of the fund is capped at a certain figure. If costs are higher than the figure, the Investment Manager will pay these fees. However, if the funds expenses are lower than this figure, the OCF will reflect the actual figure.

## Ongoing Charges Figure (OCF) – Fixed

This is where the OCF of the fund is set at a specific level and cannot decrease or increase. Should the expenses go above this point, they will be covered by the Investment Manager.

## Ongoing Charges (OCF) – Property Expense Ratio (PER)

There are costs related to running and maintaining property funds that are not covered as part of the Ongoing Charges Figure (OCF). These additional costs are grouped together and expressed as a percentage of the fund value to form the Property Expense Ratio (PER).

## Open-Ended Investment Company (OEIC)

A type of managed fund whose value is directly linked to the value of the fund's underlying investments. The fund creates or cancels shares depending on whether investors want to redeem or purchase them.

## Options

Financial contracts that offer the right, but not the obligation, to buy or sell an asset at a given price on or before a given date in the future.

## Over-the-Counter (OTC)

Whereby financial assets are traded directly between two parties, rather than carried out through exchanges set up specifically for the purpose of trading. OTC is also known as off-exchange trading.

## Overweight

If a fund is 'overweight' a stock, it holds a larger proportion of that stock than the benchmark index or sector.

## Passive Management

An approach to investing whereby capital is allocated according to the stock or sector weightings of an index. Passive management is also referred to as 'indexing' or 'tracking'.

## Passive Manager

A fund manager who takes a passive approach to investing. The passive investor aims to match the returns from the stockmarket or specified index/sector, rather than to beat them.

## Payment Date

The date on which distributions will be paid by the fund to investors, usually the last business day of the month.

## Performance

The profit or loss derived from an investment over a specified time period.

## Performance Fees

These are payments made to an investment manager for generating positive returns and will be triggered if a fund meets its performance targets. This is as opposed to a management fee, which is charged without regard to returns.

## Platform Investor

An investor who utilises an online service that makes products available from more than one provider.

## Primary Share Class

The highest charging unbundled – free of any rebates or intermediary commission – share class freely available through third-party distributors in the retail market.

## Real Return

The return on an investment, adjusted for changes in prices in an economy (inflation).

## Recommended Holding Period (RHP)

Recommended minimum period for which an investment should be held.

## Relative Return

The return of an asset in a given period compared with that of a particular benchmark. It is expressed as the difference between the asset's percentage return and that of the benchmark, and it is also known as alpha.

## Retail Investor

An individual who purchases shares for their own personal account rather than for an organisation. They also typically trade in much smaller quantities.

## Retail Prices Index (RPI)

A UK inflation index that measures the rate of change of prices for a basket of goods and services in the UK, including mortgage payments and council tax.

# Glossary continued

## Risk

The chance that an investment's return will be different to what is expected. Risk includes the possibility of losing some or all of the original investment.

## Risk Management

The activities the fund manager undertakes to limit the risk of a loss in a fund.

## Risk/Reward Ratio

A ratio comparing the expected returns of an investment with the amount of risk undertaken.

## Sector

A group of funds with similar investment objectives and/or types of investment, as classified by bodies such as the Investment Association (IA) or Morningstar. Sector definitions are mostly based on the main assets a fund should invest in and may also have a geographic focus. Sectors can be the basis for comparing the different characteristics of similar funds, such as their performance or charging structure.

## Security

Financial term for a paper asset – usually a share in a company or a fixed income security also known as a bond.

## Share/Unit

An ownership stake in a company, usually in the form of a security. Also called equity. Shares/units offer investors participation in the company's potential profits, but also the risk of losing all their investment if the company goes bankrupt.

## Share/Unit Class

Type of fund shares/units held by investors in a fund (share/unit classes differ by levels of charge and/or by other features such as currency hedging and minimum investment levels). Details on charges and minimum investments can be found in the fund Prospectus.

## Share/Unit Class – Clean

A share/unit class without any rebates or commission included in its Ongoing Charges Figure.

## Share Class Hedging

Activities undertaken in respect of hedged shares to mitigate the impact on performance of exchange rate movements between the fund's currency exposure and the investor's chosen currency.

## Short Position

A trading technique where a security is sold with plans to buy it back later. This is usually done with a view that a security may fall in value at a later date.

## Standard Deviation

A statistical measure of dispersion of a set of data from its mean, indicating the spread of a fund's returns over a certain period of time.

## Synthetic Costs

Fees paid (i.e. management fees) to other funds and/or eligible investment trusts which the fund invests in.

## Synthetic Costs – Closed-Ended

The aggregate figure of the charges incurred by the fund as a result of investing in closed-ended Collective Investment Schemes.

## Synthetic Costs – Open-Ended

The aggregate figure of the charges incurred by the fund as a result of investing in open-ended Collective Investment Schemes (CIS).

## Synthetic Fee

Fees that the Investment Manager pays to a third party to manage the assets of a fund.

## Systematic Risk

Risk inherent to the entire market and cannot be diversified. Examples include inflation and changes in interest rates.

## Top-Down Investing

An investment approach that analyses economic factors, ie surveys the 'big picture', before selecting which companies to invest in. The top-down investor will look at things like economic growth, inflation and the business cycle to pick stocks.

## Total Return

The gain or loss derived from an investment over a particular period, including income and price appreciation in that period. Income can be in the form of interest for bonds or dividend payments for shares.

## Trading Suspension

Temporarily halting the trading of a listed security on the stock exchange. It can be voluntary (requested by the issuing company) or imposed by regulators. Typically, trading suspensions are introduced ahead of important news announcements, following technical glitches, or due to regulatory concerns.

## Transaction Cost

This includes the expenses that arise from selling or buying investments in the fund, including redemption fees, transfer fees and broker commissions.

## Transaction Costs – Explicit

These are costs charged to and paid directly by the fund to purchase and sell financial instruments. These include broker commission, transaction taxes and exchange fees.

## Transaction Costs – Implicit

They include transaction costs embedded in the bid-offer spread and the response of the market to a trade or the timing of a trade (market impact, opportunity cost, delay costs), also known as slippage.

## Treasuries

Fixed income securities issued by the US Government.

## Unconstrained

The mandate of a fund whereby the manager has the freedom to invest according to his or her own strategy, rather than being obliged to allocate capital according to the weightings of an index that the fund seeks to beat or track.

## Underlying Yield

The annualised income net of expenses of the fund calculated in accordance with relevant accounting standards and expressed as a percentage of the share price as at a certain date.

# Glossary continued

## Underweight

Holding a smaller proportion of a stock than the benchmark index or sector.

## Unit Trust

A type of managed fund whose value is directly linked to the value of the fund's underlying investments and which is structured as a trust, rather than as a company.

## Valuation

The worth of an asset or company, based on the present value of the cashflows it will generate.

## Volatile

When the value of a particular share, market or sector swings up and down fairly frequently and/or significantly, it is considered volatile.

## Volatility

The degree to which the price of a given security, fund, or index changes. It is calculated as the degree of deviation from the norm for that type of investment over a given time period. The higher the volatility, the riskier the security tends to be.

## Yield

This refers to either the interest received from a fixed income security or to the dividends received from a share. It is usually expressed as a percentage based on the investment's costs, its current market value or its face value. Dividends represent a share in the profits of a company and are paid out to the company's shareholders at set times of the year.

Please note that this document is not intended to recommend or to sell an investment and is intended only as a summary. Please refer to the Key Investor Information Document (KIID), Prospectus and Report & Accounts for full details about the specific risks, performance history and other full investment objectives and policies applicable to each fund before investing in a fund. Please remember that the value of investments, and the income from them, can go down as well as up and an investor may get back less than the amount originally invested. Past performance is not a guide to future results. Tax assumptions and reliefs depend upon an investor's particular circumstances and may change if those circumstances or the law changes. If you invest through a third-party provider you are advised to consult directly with them as charges, performance and/or terms and conditions may differ. If you are not sure how the information contained in this document may affect your investment, please contact a professional adviser.

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