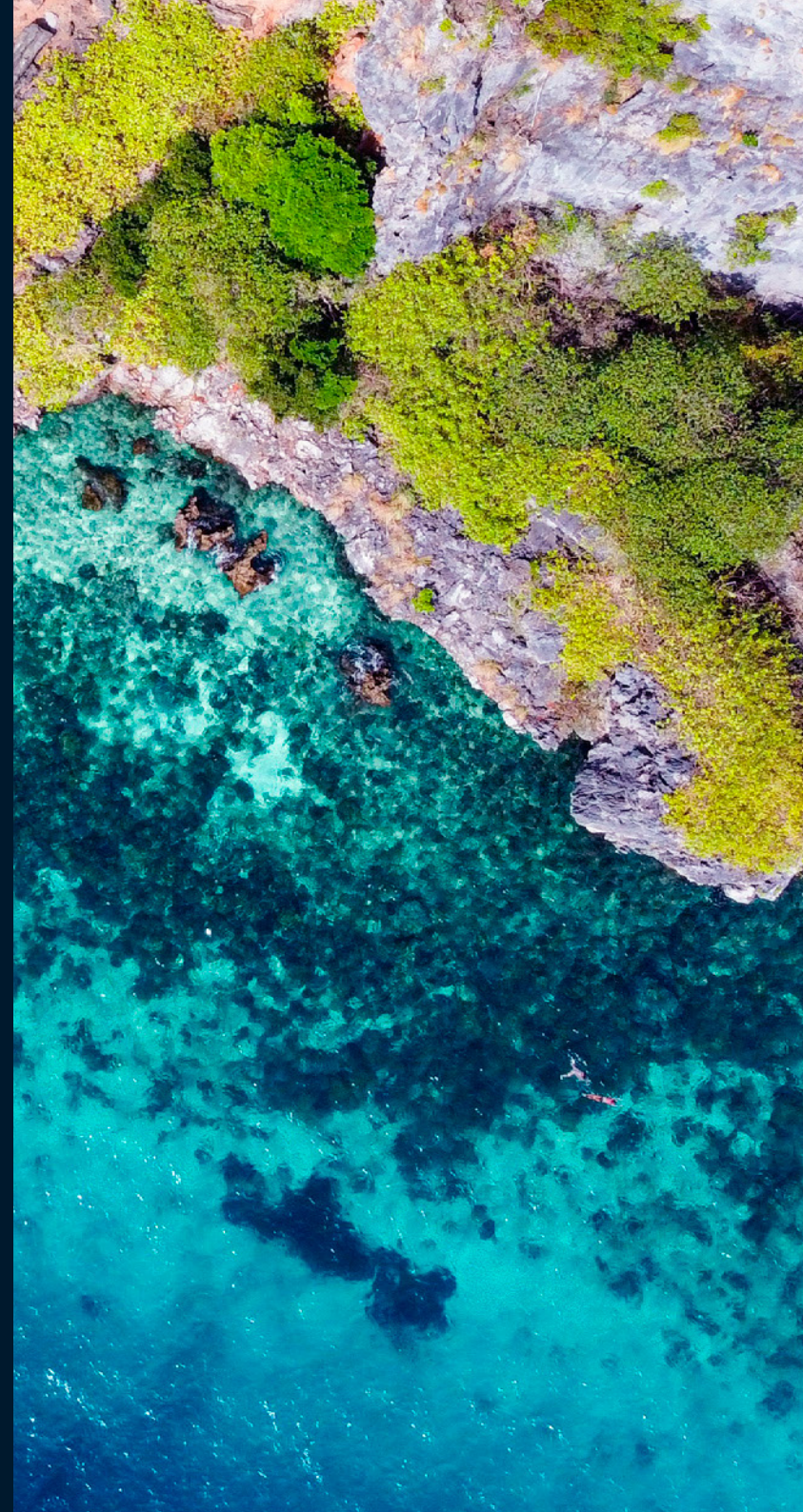


Investment Fund Services

Value assessment report

IFSL Church House Funds

31 December 2024



Please refer to our website for further information on any of the funds in this assessment.

ifslfunds.com

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Introduction

Welcome to Investment Fund Services, also known as IFSL. We are an Authorised Fund Manager (AFM) and have responsibility for operating the funds detailed in this report.

I am Katherine Damsell and act as an independent chair to the Investment Fund Services Board of Directors. Along with the board, I have a duty to you, our customer, to ensure we manage our funds in your best interests. Part of this responsibility includes carrying out each year an assessment of value on our funds and determining whether the fees and charges are justified as part of the overall value we deliver to you. We then publish our findings in a value assessment report, to provide you with the relevant information needed to help you make informed decisions about your investment.

This report is split into two sections, the first contains the results of our assessment, which covers the last 12 months up until 31 August 2024. The second part of the report includes a helpful guide about the value assessment, including the specific criteria we assess our funds against.

We hope you find this report useful and if you have any suggestions on how we could make improvements or help make things clearer, we would love to hear from you, please get in touch using the details in the 'Contact us' section at the end of this report.

Katherine Damsell
Chair of the IFSL Board of Directors

Each year, we complete an assessment of value on our funds and report whether fees and charges are justified as part of the overall value we deliver to you, our customers.



Assessment criteria

The seven minimum criteria we must consider when assessing value are:

01

Quality of service

Does the range and quality of service offer value?

02

Performance

How did the Fund perform after the deduction of all payments? This should be over an appropriate timescale, taking into consideration the investment objective, policy and strategy.

03

AFM costs

Do our charges for the AFM service we provide represent value?

04

Economies of scale

Are economies of scale being generated and, where relevant, are these being passed on to our customers?

05

Comparable services

Are the Fund's charges reasonable in comparison to other comparable services offered by the AFM?

06

Comparable market rates

How do the Fund's charges compare against similar funds in the market?

07

Share classes

Are customers in the cheapest or most relevant available share class based on their characteristics?

We are not limited to the seven criteria, but to date have found these seven to be comprehensive enough to complete a thorough value assessment. However, Investment Fund Services continuously keep this under review and will incorporate further criteria if we think it would help customers to make informed decisions about their investments in the context of value being delivered.

Fund assessments

Fund information

IFSL Church House Balanced Equity Income Fund

Launch Date	22/02/2002
Investment objective	The aim of the Fund is to provide income, which is money paid out from your investment, such as interest from bonds and dividends from shares, and capital growth, which is profit on an investment, over the long term (at least five years).
Method for assessing fund performance	<p>The IA Mixed Investment 40-85% Shares sector has been chosen as the Fund's comparator benchmark, this is used to compare the Fund's performance against other funds that have similar characteristics.</p> <p>Due to the Fund's focus on investment in UK companies, it may at times have geographic exposure which is different to the average fund in the sector. As a result, the Fund may be expected to underperform or outperform the sector depending upon the performance of UK companies relative to companies in other geographic regions. We take this into consideration when comparing the performance of the Fund.</p>
Fund size (£m)	68.1

IFSL Church House Esk Global Equity Fund

Launch Date	11/11/1996
Investment objective	The aim of the Fund is to provide capital growth, which is profit on investments held, over the long term (at least five years).
Method for assessing fund performance	The IA Global sector has been chosen as the Fund's comparator benchmark, this is used to compare the Fund's performance against other funds that are also of a global nature.
Fund size (£m)	72.1

Fund information (continued)

IFSL Church House Human Capital Fund

Launch Date	15/05/2024
Investment objective	The aim of the Fund is to provide capital growth, which is profit on investments held, over the long term (at least five years).
Method for assessing fund performance	<p>The Fund is not managed to a benchmark and due to its specific investment policy does not have a meaningful peer group to compare against. Instead we focus on the investment activity and portfolio construction when making our assessment.</p> <p>We intend to provide you with the results of this assessment in the performance section of this report each year, however because the Fund launched in May 2024, we do not have a full years worth of performance to assess, this means we are unable to provide a performance conclusion at this time.</p>
Fund size (£m)	6.8

IFSL Church House Investment Grade Fixed Interest Fund

Launch Date	11/12/2000
Investment objective	The aim of the Fund is to provide quarterly income (which is money paid out from your investment, such as interest from bonds) while maintaining capital (the value of your investment) over the long term (at least five years).
Method for assessing fund performance	The IA Sterling Corporate Bond sector has been chosen as the Fund's comparator benchmark, this is used to compare the Fund's performance against other funds that have similar characteristics.
Fund size (£m)	368.7

Fund information (continued)

IFSL Church House Tenax Absolute Return Strategies Fund

Launch Date	22/11/2007
Investment objective	<p>The aim of the Fund is to provide a positive absolute return (after any charges have been taken out of the Fund) over any rolling twelve-month period at low levels of volatility (meaning changes in value of up to 5% per annum in normal market conditions).</p> <p>Capital invested in the Fund is at risk and there is no guarantee that a positive return will be achieved over any rolling twelve-months, or any other period.</p>
Method for assessing fund performance	<p>The Fund aims, but does not guarantee, to deliver positive returns (greater than zero) in any market conditions over rolling 12 month periods. This puts it in the IA Targeted Absolute Return sector.</p> <p>The IA publishes figures showing how often funds in this sector fail to provide returns greater than zero for available rolling 12 month periods over the last three years on its website. We use this to compare how many times the Fund achieves its objective compared to other funds with an absolute return objective.</p> <p>As the funds in this sector employ diverse investment strategies, with different time-frames and risk characteristics, comparing the rate of return to the whole sector is inappropriate, we therefore use other measures to assess this. Please refer to the performance conclusion of this Fund for further details.</p>
Fund size (£m)	190.2

IFSL Church House UK Equity Growth Fund

Launch Date	06/07/2000
Investment objective	<p>The aim of the Fund is to provide capital growth, which is profit on an investment, over the long term (at least five years).</p>
Method for assessing fund performance	<p>The IA UK All Companies sector has been chosen as the Fund's comparator benchmark, this is used to compare the Fund's performance against other funds that have similar characteristics.</p>
Fund size (£m)	95.8

Fund information (continued)

IFSL Church House UK Smaller Companies Fund

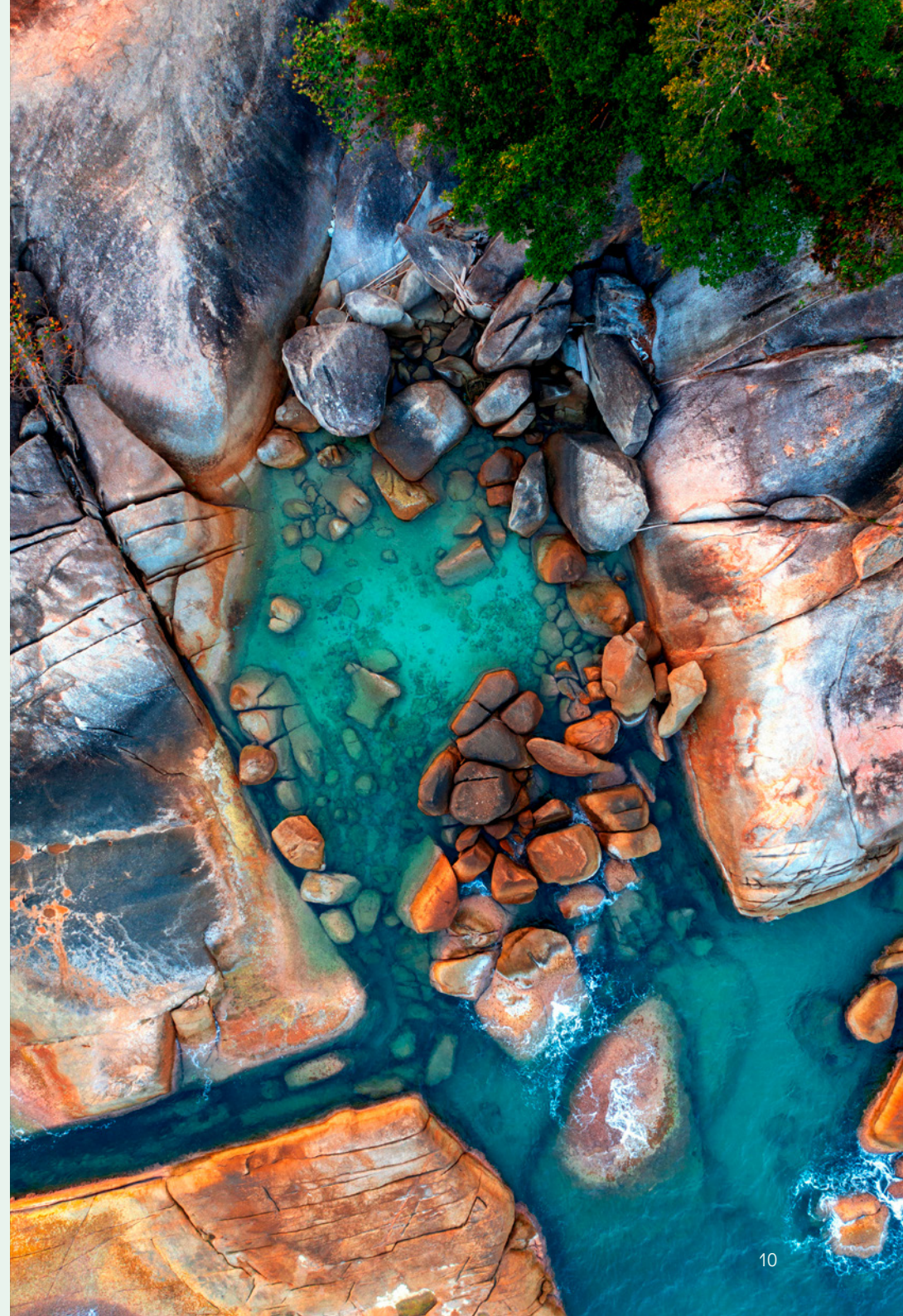
Launch Date	29/02/2012
Investment objective	The aim of the Fund is to provide capital growth, which is profit on investments held, over the long term (at least five years).
Method for assessing fund performance	<p>The IA UK Smaller Companies sector has been chosen as the Fund's comparator benchmark, this is used to compare the Fund's performance against other funds that have similar characteristics.</p> <p>Funds in the IA UK Smaller Companies sector are required to always hold at least 80% in smaller companies. The Fund invests at least 80% in smaller companies at the time of initial purchase, meaning the Investment Manager may continue to hold these companies as they grow in size.</p> <p>The Fund may therefore have less exposure to smaller companies than the average fund in the sector. This may at times cause performance to diverge away from the sector average. We take this into consideration when assessing performance.</p>
Fund size (£m)	13.9

Fund information

Here is a list of the parties that provide services to the Funds

Authorised fund manager	Investment Fund Services Limited
Sponsor	Church House Investments Limited
Investment manager	Church House Investments Limited
Administrator	SS&C Financial Services International Limited
Depository/ Trustee	NatWest Trustee & Depository Services Limited
Custodian	Caceis Bank
Auditor	Ernst & Young LLP

For more information on the types of services these parties provide, please refer to **Our assessment process**



Assessment summary

This assessment is based on the 12 months preceding 31 August 2024.

Fund	Quality of service	Performance	AFM costs	Economies of scale	Comparable market rates	Comparable services	Share classes
IFSL Church House Balanced Equity Income Fund	■■■	■■■	■■■	■■■	■■■	■■■	■■■
IFSL Church House Esk Global Equity Fund	■■■	■■■	■■■	■■■	■■■	■■■	■■■
IFSL Church House Human Capital Fund	■■■	■ ■ ■	■■■	■■■	■■■	■■■	■■■
IFSL Church House Investment Grade Fixed Interest Fund	■■■	■■■	■■■	■■■	■■■	■■■	■■■
IFSL Church House Tenax Absolute Return Strategies Fund	■■■	■ ■ ■	■■■	■■■	■■■	■■■	■■■
IFSL Church House UK Equity Growth Fund	■■■	■■■	■■■	■■■	■■■	■■■	■■■
IFSL Church House UK Smaller Companies Fund	■■■	■■■	■■■	■■■	■■■	■■■	■■■

Rating definition

■■■ Fees justified
 ■ ■ ■ Fees justified but targeting improvement
 ■ ■ ■ Requires improvement
 ■ ■ ■ Too soon to rate*

* Funds with a shorter-term performance record are not assessed against the performance criteria until they have reached the minimum timeframe detailed within their objective.

Identified actions

→ Performance

We will conclude discussions with Church House regarding the IFSL Church House Tenax Absolute Return Strategies Fund’s investment objective and investment policy and provide advance notice of any changes to investors.

Overall conclusion

We are satisfied that the charges taken from the Funds above are justified in the context of the overall value delivered to investors.

Quality of service

We have assessed each party that provides services to the Funds, categorising each into the following areas:

Our services

- ▀ The quality of governance and due diligence completed by our teams that oversee the sponsor, investment manager and administrator.
- ▀ Our risk management and mitigation processes.
- ▀ Our product governance processes and where appropriate, relevant action taken to deliver good outcomes for customers.
- ▀ Our quality and timeliness of communications to our customers so they can make informed decisions about their investments.
- ▀ Complaint analysis and resolution.

The services of the investment management and sponsor

- ▀ The quality of the investment manager's processes, their adherence to key investment parameters and service level agreements.
- ▀ The effectiveness of the sponsor, including any developments made to the Funds and how they have been distributed.

Administration

- ▀ The upkeep and maintenance of customer records.
- ▀ Timeliness and quality of transactions following customer requests.
- ▀ Quality of fund administration processes and adherence to service level agreements.
- ▀ Quality of customer services including response times to investor queries.

Services of the independent third parties

- ▀ The depositary/trustee and custodian fees against the service they provide.
- ▀ The scope of the auditor services, our interactions with them and how this compares to their fees.

Our conclusion

Overall, we are satisfied with the quality of services provided to investors by third parties and in-house.

Performance

02

IFSL Church House Balanced Equity Income Fund

Dividend yield	2024	2023	2022	2021	2020
IFSL Church House Balanced Equity Income A	3.0%	3.5%	2.9%	2.2%	3.5%
IFSL Church House Balanced Equity Income B	3.1%	3.8%	3.2%	2.4%	3.8%
IA Mixed Investment 40-85% Shares	1.8%	1.8%	1.4%	1.2%	1.6%

Annual Income Return.
Source: Morningstar.

Performance	1 year	3 years	5 years	10 years
IFSL Church House Balanced Equity Income A	17.3%	6.9%	17.2%	53.0%
IFSL Church House Balanced Equity Income B	18.0%	8.9%	21.0%	62.5%
IA Mixed Investment 40-85% Shares	12.5%	5.5%	26.0%	73.1%

Cumulative returns at 31/08/24.
Source: Morningstar.

Conclusion

The aim of the Fund is to provide income, which is money paid out from your investment, such as interest from bonds and dividends from shares, and capital growth, which is profit on an investment, over the long term (at least five years).

Over the last 5 years, the Fund consistently achieved a level of income which was greater than its comparator benchmark, the IA Mixed Investment 40-85% Shares Sector.

The Fund also provided capital growth but over the recommended holding period of 5 years both share classes provided less growth than the average of the sector. The reason for this is due to the Fund's focus on UK company shares, which did not perform as well as other geographical regions which are included within the average performance of the sector.

When assessed against measures aligned with the Fund's UK-focused investment policy and strategy, the performance meets expectations. Over the most recent 12-month assessment period we note that both share classes performed better than the sector average which reflects the recovery in performance of UK company shares during the period.

The returns in the table are net of fees, so the A share class shows lower returns due to its higher AMC. Refer to the Share Classes section for further information regarding the different classes of shares.

Taking the above into consideration, we are satisfied with the performance delivered to investors over the period.

Performance (continued)

02

IFSL Church House Esk Global Equity Fund

Performance	1 year	3 years	5 years	10 years
IFSL Church House Esk Global Equity A	13.9%	15.1%	58.8%	164.9%
IFSL Church House Esk Global Equity B	14.3%	16.5%	62.0%	177.6%
IA Global	14.6%	11.4%	49.8%	151.3%

Cumulative Returns at 31/08/24.

Source: Morningstar.

Conclusion

The aim of the Fund is to provide capital growth, which is profit on investments held, over the long term (at least five years).

Over the last 5 years the Fund has delivered a positive return and when compared to its comparator benchmark, the IA Global sector, both share classes performed better than the average fund in the sector.

Over the most recent 12-month assessment period, both share classes have provided less growth than the average of the sector.

The returns in the table are net of fees, so the A share class shows lower returns due to its higher AMC. Refer to the Share Classes section for further information regarding the different classes of shares.

Taking the above into consideration, we are satisfied with the performance delivered to investors over the period.

Performance (continued)

IFSL Church House Human Capital Fund

Conclusion

The aim of the Fund is to provide capital growth, which is profit on investments held, over the long term (at least five years).

The Fund launched in May 2024 so there is insufficient performance history to assess the Funds' performance against the recommended holding period of 5 years.

Performance (continued)

02

IFSL Church House Investment Grade Fixed Interest Fund

Dividend yield	2024	2023	2022	2021	2020
IFSL Church House Investment Grade Fixed Interest	4.6%	3.9%	2.5%	2.3%	2.1%
IFSL Church House Investment Grade Fixed Interest XL	4.8%	4.0%	2.6%	2.3%	2.2%
IA Sterling Corporate Bond	3.9%	3.4%	2.6%	2.1%	2.4%

Annual Income Return.
Source: Morningstar.

Performance	1 year	3 years	5 years	10 years
IFSL Church House Investment Grade Fixed Interest	9.6%	1.3%	8.3%	24.7%
IFSL Church House Investment Grade Fixed Interest XL	9.8%	1.8%	8.8%	–
IA Sterling Corporate Bond	10.6%	-7.9%	-1.0%	26.5%

Cumulative returns at 31/08/24.
Source: Morningstar.

Conclusion

The aim of the Fund is to provide quarterly income (which is money paid out from your investment, such as interest from bonds) while maintaining capital (the value of your investment) over the long term (at least five years).

Over the last 5 years both share classes of the Fund have provided a quarterly income. Whilst capital returns over this period have not been positive, they have been greater than the average performance of the IA Sterling Corporate Bond sector, which is the Fund's comparator benchmark, and are reflective of the returns available from the types of investments the Fund can hold.

Over the most recent 12-month assessment period, both share classes have provided a higher level of income than the average of the IA Sterling Corporate Bond sector. Although the combination of the Fund's income and capital returns over this period is less than the average of the sector, the returns for both share classes are in the top quarter of all funds in the sector over 5 years.

The returns in the table are net of fees, so the XL share class shows higher returns due to its lower AMC. Refer to the Share Classes section for further information regarding the different classes of shares.

Taking the above into consideration, we are satisfied with the performance delivered to investors over the period.

Performance (continued)

02

IFSL Church House Tenax Absolute Return Strategies Fund

Performance	1 year	3 years	5 years	10 years
IFSL Church House Tenax Absolute Return Strategies A	10.0%	1.9%	8.8%	25.1%
IFSL Church House Tenax Absolute Return Strategies B	10.4%	3.0%	10.6%	29.2%
IFSL Church House Tenax Absolute Return Strategies C	10.5%	3.3%	11.2%	33.1%
IFSL Church House Tenax Absolute Return Strategies I	10.5%	–	–	–

Cumulative Returns at 31/08/24.

Source: Morningstar.

Conclusion

The aim of the Fund is to provide a positive absolute return (after any charges have been taken out of the Fund) over any rolling twelve-month period at low levels of volatility (meaning changes in value of up to 5% per annum in normal market conditions).

Over the most recent 12-month assessment period the Fund has achieved a positive absolute return in over 99% of the rolling twelve-month periods that have occurred but has exceeded 5% volatility at times. During the past year, the Fund has achieved both a positive return and its volatility target in over 78% of the rolling twelve-month periods that have occurred.

The Fund's higher than expected volatility is a result of the general economic and market conditions which have affected the types of investments it primarily holds; loans issued by companies and governments and company shares.

Over the longer term, the Fund has not been able to deliver on its objective as consistently as it has over the past 12 months. The main reason for this is the types of investments the Fund is able to hold, as set out in its investment

policy, and the variable nature of their returns. For example, the Fund does not have the ability to hold investments that can provide a positive return when the value of investments is falling. We have considered the performance of the Fund against other measures which are more closely aligned with the Fund's investment policy and using this comparison, we note the Fund's performance is in line with our expectations.

The returns in the table are net of fees, so the A, C and I share classes show differing returns due to their respective AMC. Refer to the Share Classes section for further information regarding the different classes of shares.

Taking the above into consideration, we are satisfied with the performance delivered to investors over the period. We are however in discussion with the investment manager, Church House, regarding the Fund's investment objective and the extent to which this can be achieved in all conditions given the scope of the current investment policy. Investors will be provided with advance notice of any changes which we propose making to the Fund following conclusion of these discussions.

Performance (continued)

02

IFSL Church House UK Equity Growth Fund

Performance	1 year	3 years	5 years	10 years
IFSL Church House UK Equity Growth A	14.2%	-0.6%	22.4%	67.4%
IFSL Church House UK Equity Growth B	15.0%	1.3%	26.3%	78.4%
IFSL Church House UK Equity Growth Z	15.2%	2.1%	–	–
IA UK All Companies	16.5%	8.3%	30.5%	70.2%

Cumulative Returns at 31/08/24.
Source: Morningstar.

Conclusion

The aim of the Fund is to provide capital growth, which is profit on an investment, over the long term (at least five years).

Over the last 5 years the Fund has provided capital growth across all share classes, although when compared to its comparator benchmark, the IA UK All Companies sector, provided less growth than the average of the sector.

Over the most recent 12-month assessment period, the Fund delivered capital growth but again less than the average of the sector.

The underperformance compared to the sector is primarily due to several of the investments chosen by the Investment Manager reducing in value

during the assessment period. When compared to the average of the sector, the Fund has greater exposure to growth orientated equities (this means companies that are expected to grow at a faster rate than the average and have the potential to outperform the market over time) which, in general, have not performed as strongly over the assessment period.

The returns in the table are net of fees, so the A and Z share classes show differing returns due to their respective AMC. Refer to the Share Classes section for further information regarding the different classes of shares.

Taking the above into consideration, we are satisfied with the performance delivered to investors over the period.

Performance (continued)

02

IFSL Church House UK Smaller Companies Fund*

Performance	1 year	3 years	5 years	10 years
IFSL Church House UK Smaller Companies A	18.6%	-14.7%	–	–
IFSL Church House UK Smaller Companies B	19.1%	-13.7%	–	–
IA UK Smaller Companies	18.7%	-19.2%	–	–

Cumulative Returns at 31/08/24.

Source: Morningstar.

Conclusion

The aim of the Fund is to provide capital growth, which is profit on investments held, over the long term (at least five years).

Since the fundamental change to the Fund's investment objective, policy and strategy on 24 August 2020, the Fund has provided capital growth in line with its comparator benchmark, the IA UK Smaller Companies sector.

Over the most recent 12-month assessment period, the B share class has provided growth ahead of the average fund in the sector and the A share class has returned less.

The returns in the table are net of fees, so the A share class shows lower returns due to its higher AMC. Refer to the Share Classes section for further information regarding the different classes of shares.

Taking the above into consideration, we are satisfied with the performance delivered to investors over the period.

* With effect from 24 August 2020, the investment objective, policy and strategy were fundamentally changed. As a result, performance prior to that date has not been considered

AFM costs

We have considered the following fees* taken from the Funds. These exclude payments to your financial adviser and/or any other firm through which you invest, as those fees are paid directly by you. More detail on the amounts taken as fees can be found in the latest annual report and accounts, this is located on our website, www.ifslfunds.com.

Our fees

Annual management charge	This percentage fee (as set out in the prospectus) covers the cost of our services and allows us to pay the investment manager's fee. We have assessed the cost of providing these services and the costs of the investment manager and compared this to the income we received.
Registrar	Our fixed annual fee per shareholder account contributes to the costs of our administration service. We pay for these services directly but use the income generated from this fee to help cover this.

Fees of the independent third parties

Depository/Trustee	In 2023 we agreed a lower fee with NatWest as part of a formal review. We are satisfied these fees continue to be competitive and reflect the level of service provided.
Custody	In 2023 we agreed a lower fee with Caceis as part of a formal review. We are satisfied these fees continue to be competitive and reflect the level of service being provided.
Auditor	In 2023, Ernst and Young increased their fee. The increased fee was assessed at the time as competitive but reflected the additional costs incurred by the auditor to maintain their service levels. We believe this fee remains competitive and reflects the level of service being provided.

* Further information on the fee descriptions can be found in the assessment guide later in this report.

AFM costs (continued)

Other fees

KIID	This fee covers the cost of the production and ongoing maintenance of the Key Investor Information Document. The charge reflects the costs involved.
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→ These Funds do not have any initial charges, exit charges or performance fees.

Investors can find a detailed breakdown of the amounts paid in the latest annual report and accounts.

Our conclusion

We are satisfied all the services and the charges applied are reasonable and appropriate.

Economies of scale

04

We have considered the size of the Funds, the profits made by each party and how this has changed over the period. We have also considered our size and scale as AFM and how this has been used to negotiate each fee.

The Funds have increased in size over the period, however no further economies of scale were identified.

Our conclusion

We are satisfied that economies of scale are being passed onto investors in all share classes of the Funds where these are being achieved.

Comparable market rates

05

We have considered the fees listed under AFM costs covered earlier in this report. We have assessed how these compare to those charged by other similar funds available in the market and show these in the table below.

Fund	Ongoing charge figure (OCF)	Market average*
IFSL Church House Balanced Equity Income Fund A	1.55%	0.90%
IFSL Church House Balanced Equity Income Fund B	0.92%	0.90%
IFSL Church House Esk Global Equity Fund A	1.30%	0.89%
IFSL Church House Esk Global Equity Fund B	0.92%	0.89%
IFSL Church House Human Capital Fund F	0.66%	0.89%
IFSL Church House Investment Grade Fixed Interest Fund	0.85%	0.44%
IFSL Church House Investment Grade Fixed Interest Fund XL	0.54%	0.44%

Source: Morningstar.

* This is the mean OCF of each Fund's peer group as defined by the Investment Association.

Comparable market rates (continued)

Fund	Ongoing charge figure (OCF)	Market average*
IFSL Church House Tenax Absolute Return Strategies Fund A	1.28%	0.88%
IFSL Church House Tenax Absolute Return Strategies Fund B	0.93%	0.88%
IFSL Church House Tenax Absolute Return Strategies Fund C	0.81%	0.88%
IFSL Church House Tenax Absolute Return Strategies Fund I	0.72%	0.88%
IFSL Church House UK Equity Growth Fund A	1.55%	0.72%
IFSL Church House UK Equity Growth Fund B	0.92%	0.72%
IFSL Church House UK Equity Growth Fund Z	0.65%	0.72%
IFSL Church House UK Smaller Companies Fund A	1.37%	0.94%
IFSL Church House UK Smaller Companies Fund B	0.99%	0.94%

Source: Morningstar.

* This is the mean OCF of each Fund's peer group as defined by the Investment Association.

Our conclusion

The OCF of the A share class of each Fund is higher owing to its higher AMC. Investors in this share class receive additional services from Church House, as set out further in the Share Classes section on the following page. Taking this into consideration, we are satisfied that the fees are reasonable in comparison to their respective market averages.

Comparable services

06

We have compared the costs of the services provided to the funds with other funds in our range, of a similar size and nature.

Our conclusion

We are satisfied that the costs are reasonable and appropriate having regard to comparable services of a similar nature.

Share classes

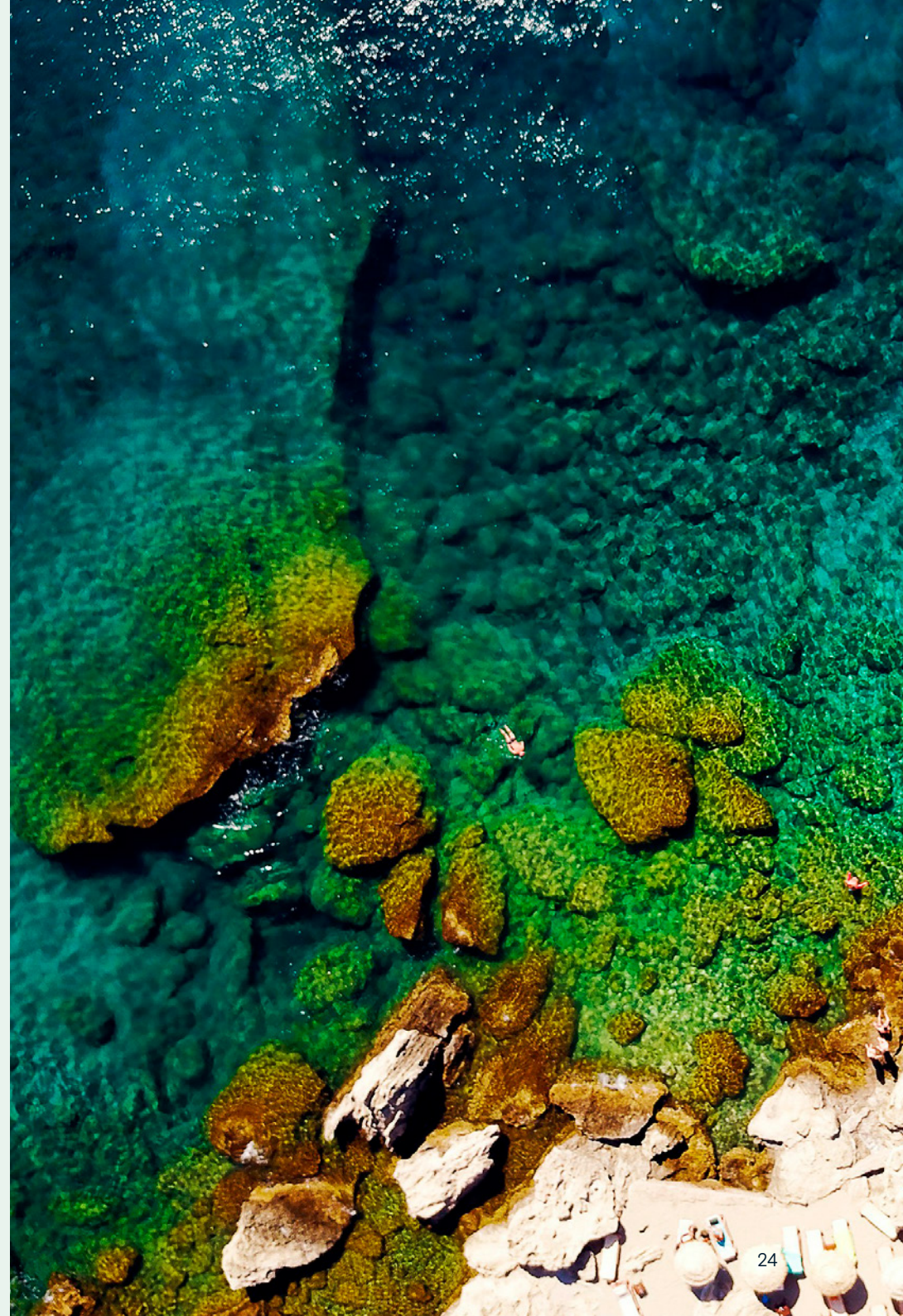
07

The share classes in the Funds differ in the way that they treat income payments (either by distributing income or by accumulating them and reflecting this in the price) and in the level of Annual Management Charge (AMC) applied to them.

The A share class has a higher AMC than the B share class due to additional shareholder services that Church House are providing and is exclusively for their clients. Some of the Funds also offer Institutional share classes which have a higher minimum investment requirement.

Our conclusion

Having reviewed the different charging levels across the share classes and the customers that are invested in them, we are satisfied that all customers are in the appropriate share class based on their circumstances.



Important information

Capital is at risk. Past performance is not a guide to future performance. Investments can go down as well as up and investors may not get back the amount originally invested. This can be as a result of market movements and exchange rates between currencies.

The Funds will be exposed to stock markets and market conditions can change rapidly. Prices can move irrationally and be affected unpredictably by diverse factors, including political and economic events.

Inflation will, over time, reduce the value of your investments in real terms. This is especially true at times of high inflation. You should consider the impact of inflation when reviewing your investments.

A more detailed description of the risks that apply to our funds can be found in the fund prospectus. You are required to read the Key Investor Information Document (KIID) before making an investment.

The KIID and prospectus for all funds are available free of charge at www.ifslfunds.com or by calling 0808 178 9321.

Our assessment process

What is the value assessment?

The rules of the Financial Conduct Authority (FCA) require all AFMs to assess whether the payments out of each fund, as set out in the prospectus, are justified in the context of the overall value delivered to customers.

These assessments must be conducted at least annually using the FCA's minimum criteria, of which there are currently seven. Where a fund is not providing value for money, AFMs must explain what action they are taking to address this.

The Chair of IFSL's Board of Directors has responsibility to ensure we carry out the value assessment and is actively engaged in the process. The board of Investment Fund Services includes two independent non-executive directors who provide an unbiased perspective and challenge during the assessment process, with a keen focus on safeguarding the interests of our customers by delivering good outcomes.

Quality of service

01

Our services

This section covers the services provided by Investment Fund Services as **AFM**. We have ultimate responsibility for running each fund and we require good governance and risk management processes to be in place to ensure funds perform as expected and deliver good value.

We produce all key information about the funds, focusing on clear and timely communications that enable customers to make informed decisions about their investments.

We set the distribution strategy of each fund and oversee how the funds are promoted so that they are reaching the right customers (the target market). We also delegate some roles to other firms and oversee these firms to make sure they are performing as expected, we consider the effectiveness of the following areas in the assessment of ourselves.

- ▀ Our resource and expertise
- ▀ Our risk framework and effectiveness of controls
- ▀ How we oversee the firms we delegate to and address any issues
- ▀ Our communications with customers, including those with vulnerable characteristics
- ▀ Any product complaints or grumbles and how these were resolved

Investment managers and sponsors

As an independent AFM, we delegate the investment management to other firms and oversee these firms to ensure they provide a good service and meet expectations. The **investment manager** is responsible for the investment decisions of each fund in pursuit of the fund's aim (its objective). They also manage the level of risk taken, making sure they keep within the parameters of the investment policy. Sometimes investment managers appoint other firms to help them, we call these sub investment managers or investment advisers. These firms are also assessed in the same way as the investment managers.

The **sponsor** is a firm that collaborates with Investment Fund Services to design and promote a fund, we call this co-manufacturing. They play a key role in the commercial success of a fund because they take a lead in its promotion and distribution to the target market. Investment Fund Services oversee the sponsor, making sure their role is being performed to a good standard. Sometimes the sponsor is the same firm as the investment manager.

We base our assessment on how well they perform their respective roles, using a mix of criteria including but not limited to:

- ▀ The quality of their processes and procedures
- ▀ Their resource, research and expertise
- ▀ The effectiveness of their controls
- ▀ The effectiveness of their risk management framework
- ▀ Their adherence to the set investment parameters
- ▀ How well they managed transactional costs
- ▀ The quality and quantity of any distribution activities and literature

Quality of service (continued)

Administration

The administration responsibilities fall into two distinct areas.

Customer administration

This is all things related to customer requests, such as opening an account and investing your money through to selling your investment when you are ready to close your account. Do we keep your records up to date, making sure things like your address and personal details are correct? Are we on hand to deal with your questions and do we point you in the right direction if you wish to make a change to your account? We base our assessment on how well these services have been delivered.

Fund administration

This function calculates and publishes the value of each fund every business day. This is so we can calculate the correct value of your investment. We record and process transactions made by the investment manager and calculate the running cost of each fund so that you know what costs you incur, helping you to consider and compare costs before making informed investment decisions. We prepare half yearly financial statements that contain important information on each fund like its performance (once all charges have been deducted), any income distributed, and any tax that had to be paid.

We base our assessment on how well our administrator performs these tasks and how efficiently they carry out these activities against the service levels we expect. We use a mix of criteria including but not limited to:

- ▀ Customer feedback
- ▀ Adherence to agreed service levels
- ▀ Breaches and complaints records
- ▀ Scope of systems and controls
- ▀ Quality and efficiency of their processes and procedures
- ▀ Quality, speed and accuracy of customer interactions

Services provided by independent third parties

These services are from the depositary, custodian and independent auditor. Depending on the type of fund and the assets held, this can sometimes also include services provided by a hedging agent or an independent valuation service.

The **depositary** is independent and has various regulatory responsibilities, the key one being overseeing us and the Fund's assets to ensure they are safeguarded for customers. We as AFM, select the Depositary and negotiate their fees.

The **custodian** has responsibility for holding the Fund's assets, ensuring they are protected which minimises the risk of assets being lost or stolen. The custodian is appointed by the Depositary, but we are party to the selection and negotiate their fee.

The **auditor** is an independent entity responsible for auditing the statutory accounts of the funds. They are selected and appointed by us, and we negotiate the fee they charge.

We base our assessment on a mix of criteria including but not limited to:

- ▀ Size and reputation within the industry
- ▀ Expertise, scale and involvement with regulatory and industry change
- ▀ Geographical relevance, scale and suitability
- ▀ Resource and expertise
- ▀ Quality of interactions

We work with a limited number of depositaries and custodians. There are presently two depositaries and three custodians across the entire range of funds for which we are the AFM.

Performance

When assessing the value of a fund’s performance during the period, we consider how it has performed against its objective and investment policy. Objectives are set out over a specific time period, such as five years, and we bear this in mind when forming our conclusions. We also take into account market conditions, as well as the activities and strategies implemented by the investment managers during the period.

For each Fund we consider:

- ▀ How well the Fund compares relative to its target, comparator or constraining benchmark
- ▀ Volatility (a measure that considers how often, and by how much, the value of an investment goes up and down)
- ▀ Fund performance, relative to a range of industry standard risk-adjusted measures
- ▀ Investment management activities and strategies undertaken in pursuit of a fund’s objective

A fund’s prospectus defines the measures used to assess performance, usually this measure will be a benchmark of which there are three different types as detailed below.

01	02	03
<p>PERFORMANCE TARGET</p> <p>This benchmark is part of a fund’s objective and outlines a specific measure it aims to achieve.</p>	<p>COMPARATOR</p> <p>This benchmark is used for comparison purposes only. It helps customers compare performance to a group of similar securities (known as an index) or other funds (known as a peer group).</p>	<p>CONSTRAINT</p> <p>If a fund has a constraint benchmark, it means the Investment manager is limited in how the fund’s portfolio is constructed, which can influence performance.</p>

AFM costs

03

Fees taken from the Fund can make a big difference to overall returns, so it's important we identify each fee incurred, ensuring they are reasonable and relative to the level of service provided.

A useful way of summarising these fees is by assessing all components of the Ongoing Charges Figure (OCF). Here's what the OCF may include:

Annual management charge (AMC)*	This is a percentage fee paid to Investment Fund Services as AFM. This usually covers the costs of the investment manager, sponsor and administrator.
Depository fee	This is a percentage fee paid to the depository.
Custody fee	This is a combination of percentage, fixed and transaction-based fees paid to the custodian.
Audit fee	This is a fixed annual fee paid to the auditor.
Independent valuer fee	This is a fee paid to a specialist firm that independently values certain products if held by a fund.
KIID fee	This is a fixed annual fee paid to cover the cost of reviewing and updating the key investor information document (KIID).
Registrar fee	This is a fee charged (usually per shareholder) to cover the costs of the administrator maintaining the shareholder register.

** Some funds do not have an AMC, instead they have either a fund management fee or the AMC is split into two fees. Some funds may also have a separate administration or sub-investment manager fee. We will tell you about these fees and which ones apply in our assessment.*

AFM costs

03

Hedging administration fee	This is a percentage fee paid to the organisation that provides currency hedging services, if applicable. These services mitigate the risk of adverse currency exchange rate movements affecting the value of investments. We will tell you if your Fund has these services.
EMX and Calastone	This is a fixed fee paid per transaction to enable straight through processing (STP) with the administrator.
Other fees	Some Funds may have the additional fees taken from the fund such as notary, legal and collateral fees, we will tell you about these if they are material to our assessment.

In our assessment of the fees, we consider the following:

- ▀ The revenue received, and profits earned after accounting for all operating costs.
- ▀ Whether the profit is proportionate given a number of factors, including the level of risk taken in operating the Fund.
- ▀ Whether the revenue is sufficient to enable parties to deliver the expected level of service quality and to enhance it over time.

We also consider when the fees were last reviewed and whether they remain competitive, accounting for factors such as changes in the size of the Funds. Our aim is to ensure that the fees taken are reasonable, competitive, and support the delivery of high-quality services to our customers.

Economies of scale

We consider two different types of economies of scale:

The size and scale of a fund

When there is a range of funds, profits from the larger funds in the range may sometimes subsidise the operation of smaller funds or be key in ensuring the long-term financial security of a firm providing services to a fund. Our assessment considers these arrangements and whether they are in the best interests of investors. If not, we will take steps to ensure that the benefits of scale are passed on to investors.

Certain services have fixed or minimum fees. This means that as funds grow, they benefit from their increase in scale as the effect of those fees on costs and charges reduces. Our aim is to ensure that each fund delivers value to customers and remains viable in its own right, considering the impact of any fixed or minimum fees.

The size and scale of Investment Fund Services

The second area of economies of scale is where we can negotiate terms for the large number of funds under our management as AFM. Investment Fund Services oversees more than 80 funds, valued at over £15 billion in total. We use our scale to negotiate fees where we think it is in the interests of all affected funds. We discuss with our suppliers the need to ensure that fees are distributed fairly and transparently across all the funds.

Depositary, custody and audit relationships are negotiated across multiple funds to achieve the best possible rates. Investment Fund Services negotiates depositary fees based on a sliding scale, applying lower percentage fees as funds reach specific thresholds. This ensures that economies of scale directly benefit customers.

Comparable market rates

We review the fees paid to external parties and compare each fund's OCF with similar funds in the market within the same peer group.

While market rates for depositories, custodians, and auditors may be subject to commercial confidentiality, our experience with previous fees, combined with our tender or review processes and market awareness, mean that we believe our approach secures competitive rates when contracts are reviewed or re-tendered. We ensure that these reviews occur at appropriate intervals, considering the nature of the relationships and the associated costs of changing suppliers.

When assessing fees paid to the investment manager and sponsor, we compare them against those for similar services provided to other funds for which we are AFM.

The market rates for independent AFMs are also subject to a degree of commercial confidentiality and vary based on the size and type of fund. Contracts are negotiated based on market competitiveness within the independent AFM market. Fund sponsors typically conduct thorough tendering processes and can move the funds to other independent AFMs. This ensures that Investment Fund Services remains competitive, offering value for customers.



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Comparable services

Investment Fund Services provides services to many fund ranges and we compare the fees we charge.

While the fees may differ based on factors like fund size, nature, and associated risks, we review these to ensure our fees are similar to those paid by similar funds within our range.

We also consider comparable services offered by external or delegated parties, such as the investment manager. Where providers do offer comparable services, we ask them to outline the key differences in charges and service. This helps us ensure that our investors receive good value compared to alternative products and services available from the same provider elsewhere.

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Share classes

Some funds provide multiple share classes with different fee structures for investors. We review these fee structures to ensure they are reasonable and appropriate.

Additionally, we assess whether investors are in the most appropriate share class available to them. If we identify any issues, we will tell you and transfer you to the most appropriate share class.

Investment Fund Services

CONTACT US

Customer enquiries

Please contact our dedicated customer support team who are available Monday to Friday 9:00am to 5:00pm (excluding UK bank holidays).

Write to: Investment Fund Services, Marlborough House, 59 Chorley New Road, Bolton, BL1 4QP

Call: 0808 178 9321 or +44 1204 803 932 (if calling from overseas).

Email: ifslclientsupport@ifslfunds.com

Fax: 01204 533045

Supporting your needs

We have different ways in which we can communicate with you to support your needs and make investing with us easier.

Some of the services we can provide are listed below. However, please contact us using the details on this page so we can discuss your options and provide the right level of support for you.

- ▶ Braille or large print communications and statements
- ▶ Audio transcribed communications
- ▶ Easy read communications

Regulatory Information

Investment Fund Services and IFSL are trading names of Investment Fund Services Limited, registered in England No. 06110770. Authorised and regulated by the Financial Conduct Authority in the UK (FRN464193). Registered Office: Marlborough House, 59 Chorley New Road, Bolton, BL1 4QP. Investment Fund Services is part of Marlborough Group Holdings Limited, registered in England No. 10078930.