

Assessment of Value 2024



Letter from the ACD Independent Non-Executive Director and Chairman of the ACD Board

Paul Simpson

At Scottish Widows Schroder Personal Wealth (ACD) Limited, we are responsible for the day-to-day management of the SPW funds, ensuring that they are managed in line with their objectives, strategy and principles.

Additionally, we are required to carefully assess annually whether our funds represent fair value and to provide a report on this to our investors. Our assessments are required to consider key matters relating to our funds.

We have reviewed our funds as at the 30th June 2024, and this report aims to set out the status of our funds in order that you are able to understand whether they are meeting their goals and providing fair value. Where we have identified issues relevant to the value provided by our funds to investors, these are set out in the statement together with an explanation of the action we have taken or intend to take in the future.

Since the last report in 2023, as my colleague Alan Goodman, CIO, discusses later, SPW (ACD) has embarked on a major program of work to enhance our products for the benefit of investors. Called the “Leading Investment Offering” or LIO this is an extensive and multi-faceted change program on which management have expended much time and resource. I have been pleased by the energy with which management have embraced this program and progress has been ahead of my expectations. I am excited to see the results.

The sheer scale of these enhancements can create issues of continuity in our reporting. In this report we have been careful therefore to distinguish between historic or backward-looking analysis such as historic investment performance and forward-looking statements around expectations for future outcomes. We also distinguish between changes which have an immediate beneficial outcome for investors, such as a price cut, and those benefits which accrue over the medium term, such as enhancements to the risk and investment management processes.

Whilst discussing the investment management process I am particularly pleased to see the ACD enhancing the relationship with our preferred investment manager, Schroder Investment Management Limited (SIML). I believe that better leveraging SIML’s scale, experience, expertise and success can only improve our outcomes.

I hope that you find this report interesting and informative. Where relevant, you should discuss any questions that you have with your SPW (or other) financial adviser.

I would like to thank Dominic Sheridan and his management team for their openness in dealing with me and the other non-executive directors and their willingness to embrace challenge.

We would all like to thank you for your continued investment in our funds. We remain committed to ensuring that we deliver a high-quality service to you and that our funds aim to deliver good outcomes at a fair cost.

30th October 2024

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SPW (ACD) Board of Directors

The Scottish Widows Schroder Personal Wealth (ACD) Limited board of directors includes the Executive Directors and Independent Non-Executive Directors. The board is responsible for administration, accountancy and providing the legal framework around the funds, including compliance. The SPW (ACD) Board represents the best interests of our customers, ensuring the assessment of our funds is clear, fair and not misleading.

Executive Directors



Dominic Sheridan, Chief Executive of SPW (ACD)

Dominic joined SPW in 2023 from Omnis Investments Ltd, where he was the Chief Executive Officer. Dominic has over 25 years' wealth and investment industry experience and extensive fund governance, portfolio management, investment operations and change management expertise. Prior to his role at Omnis, Dominic held senior roles at PineBridge Investment Management, F&C Asset Management and Royal & Sun Alliance Asset Management.



Alan Goodman, ACD Chief Investment Officer

Having joined SPW in 2023 as Chief Investment Officer, Alan has over 25 years' experience in the investment industry. Alan was most recently at St James's Place, and also has experience as Chief Investment Officer for a corporate pension scheme. Having started his career in equity investing at Invesco, Alan has extensive experience managing all asset classes at other organisations.



Julian Walker-Hazell, Head of Fund Services

Julian has more than 30 years' experience in financial services, over half of which was spent at Cazenove Capital Management and Schroders (which acquired Cazenove in 2013), where his roles included Director of Investment Operations and Head of UK Fund Services. Julian joined SPW as Head of Fund Services in 2019.



Joel Ripley, Chief Financial Officer

Joel is responsible for SPW's finance infrastructure and risk management framework. Previously, Joel was Finance Director of Wealth and Stockbroking at Lloyds Banking Group, having joined the bank in 2003. Prior to this, Joel held roles at JP Morgan and Deloitte. Joel is a Fellow of the Institute of Chartered Accountants in England and Wales.

Independent Non-Executive Directors



Paul Simpson

Paul has over 30 years' experience of securities, markets and financial services. Initially working in risk management and trading in investment banking, since 2000 Paul has worked in the asset management sector. Joining Old Mutual (now Quilter) in 2006 as a Portfolio Manager, Paul was appointed as Director of Investments at Old Mutual Global Investors and for four years held the role of Chief Executive Officer at Quilter Investors. Paul joined SPW in 2022.



Dena Brumpton

Dena has over 30 years' experience as a senior financial services professional, the large majority of which she spent at Citigroup, where her roles included Global Chief Operating Officer of Citibank Private Bank. Dena also worked as Chief Executive Officer of Barclays Savings, Investments and Wealth Management before joining SPW in 2019.

Introduction

This Assessment of Value report (AoV) is written on behalf of the board of Scottish Widows Schroder Personal Wealth (ACD) Limited, which is referred to as ‘SPW (ACD)’, ‘we’ or ‘our’ in this report. It aims to help investors in our funds have an informed view of whether their fund provides value - or not. The assessment is based on the framework provided by our regulator, the Financial Conduct Authority (FCA) and comprises seven key “pillars” – the term the FCA uses to mean different criteria of value.

One of the pillars, Comparable Services, which asks how the fees charged to a fund compare with those charged to similar funds or services offered to other customers, is not covered in this report. This is because we do not offer any funds or services other than the funds in this report and so SPW has no comparable products.

The report therefore covers the remaining six pillars:

<p>1. Performance</p> <p>Have our funds performed in line with expectations?</p> 	<p>2. Comparable Market Rates</p> <p>How do our fees compare against those of our competitors?</p> 	<p>3. Classes of Shares</p> <p>Are our customers invested in the most appropriate share class for their investment needs?</p> 
<p>4. Economies of Scale</p> <p>Do we pass on savings to our customers as the funds grow?</p> 	<p>5. Authorised Fund Manager costs</p> <p>Are the fees charged to the fund reasonable and appropriate?</p> 	<p>6. Quality of Service</p> <p>Are we meeting our customers' expectations on the service we deliver?</p> 

You can find more details of each fund on the individual fund pages later in the report. By clicking on the small house icon in the bottom right-hand corner of the page, the reader can return to the contents page.

Words or terms that may need more explanation are set out in the Glossary.



Enhancing Value: Actions Taken since last report

Transition to multi-strategy

In August 2024, we changed the way the SPW Multi-Manager funds are managed. Previously Schroder Investment Management Limited (SIML) delegated the management of some of the assets to third party investment management firms, referred to as sub-advisers. Going forward, the assets will be directly managed by SIML.

This means our funds will be simpler and easier to manage, with the ability to have greater conviction in their positioning. We believe that a single investment firm approach is the most appropriate for delivering the best long term investment outcomes for our investors.

As the funds have moved to be managed by SIML, the term 'Multi-Manager' has since been removed from their names, however they will be referred to as Multi-Manager funds in this report as this was the status at the time the assessment was carried out.

Fund range enhancements

To enhance and diversify our fund proposition, we launched two new 'low duration' funds in 2024 which have helped to reduce exposure to Interest Rate risk: the SPW Global Corporate Low Duration Bond in January and the SPW Global Government Low Duration Bond in May.

In May 2024, we also updated the strategic asset allocation for our Solution and IPS multi-asset fund ranges to capitalise on these new offerings, reducing a significant portion of the interest rate risk from the funds which we believe will deliver better outcomes for our customers.

Additional changes have been made after the period covered in this report to further enhance the fund range, including the merging of regional equity funds into a single Global ex UK fund to provide a better style balance, and splitting of the Asset Allocator fund into two Tactical funds to support different risk profiles. Last, the Global High Yield and Emerging Market Debt fund has been transitioned to High Yield only to align to our new Strategic Asset Allocation.

These changes are discussed in more detail in the CIO's report on the next two pages.

Fund closures

In October 2023, we merged smaller funds within the Solution fund range through a scheme of arrangement to improve future customer outcomes. As a result, Defensive Solution, Strategic Solution, and Adventurous Solution were closed and consolidated into other funds within the range. In addition, to safeguard client assets, the IPS Strategic Income Portfolio was also closed as its assets had reduced over time. Although outside of the period of this report, in October 2024 we also closed the Global Real Estate and UK Equity Income funds.

Fee simplification and reducing fees

We have changed how we calculate and charge the management and operation fees. This simplified method will make it easier for investors to understand our charges, as the Annual Management Charge (AMC) now covers Investment Adviser and major service provider fees, which were previously charged separately to the funds.

The AMCs of certain share classes have been reduced to reflect their use within cross-held SPW fund-of-funds, which will lower the overall fees for the fund ranges that invest in these share classes, including Solution funds. Additionally, to pass on economies of scale we plan to reduce the AMC fees of the Solution funds to further enhance the value provided to customers.

Moving to a new Transfer Agent

We have made significant investments to improve consumer understanding and support by appointing a new Transfer Agent in June 2024. This aims to improve our customer service and communication tools, offering better support and online service. We believe these improvements not only enhance the investor experience but also contribute to the long-term success and sustainability of the funds.

The benefits to customers include:

- an enhanced online service portal
- the introduction of a free phone number for our Customer Services Centre
- improved Vulnerable Customer identification and support.



Review by the ACD Chief Investment Officer

Alan Goodman

Welcome to our latest Assessment of Value report for the SPW (ACD) Funds. This year has been busy for both the markets and our business as we've made significant changes to our funds to better serve our clients. Alongside making these changes, our priority has been to ensure each fund continues to provide good or improving value to our customers.

Market Overview

Global financial markets experienced a turbulent 12 months driven by persistent inflation, rising interest rates by central banks to control inflation, and geopolitical tensions. Throughout 2023 and into 2024, markets have shown signs of recovery, but not consistently. While equity markets have experienced periods of growth, bond markets have stayed unpredictable.

These recent economic conditions have resulted in increased volatility for some of our funds, affecting their performance. Where relevant, market impact is discussed in the individual fund assessments later in this document – together with fund-specific action(s).

Leading Investment Offering - Investment Strategy and Fund Changes

As referenced in the Statement from the Chairman, there have been a number of changes to our investment approach and products in 2024. This includes:

Transition to a Preferred Investment Manager Approach

In August 2024, the SPW 'Multi-Manager' funds transitioned to a preferred investment manager (multi-strategy) investment approach with our Investment Adviser, Schroder Investment Management Limited (SIML).

SIML is one of the world's largest investment managers with impressive investment capabilities and performance across asset classes and geographies and I believe that having all assets under its control will enable the better understanding and management of the investment strategies and styles that may be deployed and potentially blended in our funds.

Furthermore, direct control of the portfolios should enable the more efficient implementation of changes to investment strategy, particularly in difficult market conditions. Finally, the fund portfolios will reflect the economic, market and asset views of a single, world leading, investment house.

Change in Strategic Asset Allocation

The changes to the composite, risk rated benchmarks of the Solution funds followed the review of the ACD's Strategic Asset Allocation Models ('SAA'), which is supported by the expert external consultancy Fundhouse. These models represent the ACD's view of the allocations to assets that aims to achieve the best risk adjusted returns for investors over the long term and are developed for differing levels of investment risk. The revised composite benchmarks reflect increased granularity in bond allocations and the amalgamation of the regional equity allocations into a single global (ex-UK) equity allocation.

The changes to the benchmarks were supported through the launch of two new SPW funds investing in low-duration bonds issued by governments and corporates.



Review by the ACD Chief Investment Officer

Alan Goodman

Change to the Benchmark – SPW Global High Yield Bond Fund

In August 2024, we changed the benchmark of the SPW Global High Yield Bond fund to enable the transition away from Emerging Market Debt to Global High Yield Bonds.

This change reflected our long-term, relative return expectations and our expected volatility (risk) view between the asset classes. We also believe that High Yield Bonds provide better liquidity and improved efficiency of active management (trading ability).

We also recognised that certain types of unexpected risk (not reflected in forward looking estimates of volatility) tend to disproportionately impact Emerging Markets, often with materially negative consequences.

Merger of the SPW Regional Funds

In October 2024, the assets of four SPW ‘regional’ equity funds were merged into a single fund investing in equities outside of the UK. This reflected a belief that the most effective approach to global equities, particularly under a single investment firm model, is to invest globally, rather than on a regional basis. The potential benefits of a global model include:

- Improved portfolio volatility management.
- Improved investment coordination and flexibility.
- Better management of potential regional investment style bias at a fund level.
- Better focus on stock selection from the global investment universe.
- Improved conviction in the portfolio positioning and access to themes on a global basis.

Adoption of a Revised Responsible Investment Policy

The transition to a single investment manager approach enabled the adoption of a simplified and standardised Responsible Investment Policy (across all funds other than the SPW Portfolio Funds). This policy was adopted at the beginning of October 2024

Split of the SPW Asset Allocator Fund

In September 2024, the assets of the SPW Asset Allocator Fund were split equally into two new ‘tactical’ funds focussing on either bond or equity investing. These funds are considered only suitable to be held in risk-rated discretionary portfolios offered by the wider SPW group. The change enabled SPW greater precision in discretionary allocations to the new funds. The new SPW funds invest directly in assets rather than through collective investment vehicles.

Whilst I am positive about these changes and confident that they will result in better long-term outcomes for investors, we will keep the position, and the investment strategies deployed by our funds, under continuous review.

30th October 2024

The Assessment Pillars



Performance

Have our funds performed in line with expectations?

As an active fund manager, we consider a fund to provide value when it consistently meets its investment objective, that is typically to outperform its benchmark, over its stated investment time horizon.

The majority of our funds have an investment period or time horizon of 5 to 7 years, which we believe is the minimum holding period to achieve the best results for customers. However, we became the Authorised Corporate Director (ACD) for 10 of the funds in this report in December 2019 and have launched the other 15 funds since then. Consequently, we are not able to assess the value of performance over the full recommended holding period. Therefore, conclusions should be viewed in the context of the fund's time horizon which is provided in the fund's performance commentary. For additional context and transparency, we have included peer group performance in the fund pages, although this is not part of our formal performance assessment. The list of peer groups is provided in the appendix.

We have focused our performance assessment since we became the ACD of the funds in December 2019 or since inception of any funds launched more recently. Our approach is to rate a fund Green only if it has outperformed its stated benchmark over the longest period available. Performance is shown to the end of June 2024.

SPW (ACD) has delegated investment management to Schroder Investment Management Limited (SIML), which acts as Investment Adviser, providing expert advice and management of the funds. Our independent investment office actively reviews and challenges the delegated manager, maintaining oversight of performance, risk and compliance for the funds. This robust governance and oversight of our funds and third parties is essential to protecting our customers' best interests.

General Conclusions and Observations

Of our 25 funds, we believe three provided value under the performance pillar, 18 provided reasonable value, while two funds were deemed not to have provided value in the performance area. Where challenges with performance have been identified, we have already implemented actions with the aim of improving performance going forward. Those actions are outlined on the individual fund pages of this report.

The two remaining funds were launched in 2024, so there is currently insufficient performance history for us to make a meaningful assessment.

For all of our funds, we continue to monitor performance throughout the year to make sure they are delivering good outcomes for our customers. We remain committed to making necessary adjustments, enhancing fund strategies, and addressing any issues promptly and as they arise.



Comparable Market Rates

How do we assess how our fees compare against those of our competitors?

To assess the competitiveness of our funds' pricing, we compared each fund's ongoing charge figures (OCFs) with those of similar funds managed by other fund managers. The peers are determined by an independent third-party based on investment focus, objectives, and styles, to assess how our charges align with the market.

By evaluating the charges of our funds relative to similar offerings in the market, we aim to ensure that our funds offer competitive pricing while delivering value to our customers. This approach supports our commitment to transparency and fairness in assessing our overall value proposition.

We consider a fund to offer value against the 'Comparable Market Rates' pillar if its charges are below or very close to the median of its Peer Group.

General Conclusions and Observations

Our review shows that the majority of our funds are competitively priced relative to peers. 22 of our 25 funds provided value, two funds offered reasonable value, and one fund did not deliver value over the reviewed period.

We have already taken action to review the charging structure of all our funds. We have reduced the costs of accessing the underlying investments within Solution funds, which will reduce the OCF of the fund range going forwards, without any impact on performance. This will reduce the OCF of the three funds identified in our review as offering only 'reasonable' value or not providing value to below the medium of the peer group. Additionally, the Annual Management Charge (AMC) of Solution funds will be lowered to improve the value provided to investors.

We will continue to review the charges to ensure they are competitive to peers through our existing governance and periodic reviews.



Classes of Shares

Are customers in the most appropriate share class?

As an ACD serving a wealth management business we have different types of shareholders invested in our funds. We deem it appropriate to have separate share classes for each shareholder type where relevant.

For some of our funds, we offer different types of units or classes of shares, each with unique features such as distribution methods, target customers, charges, and income handling (accumulation or distribution). Our ongoing product governance ensures that our customers remain invested in the right share class for their needs. We regularly review and clarify why each customer is invested in a particular share class.

General Conclusions, Observations

All 25 funds provide value for their share classes. Since taking over as ACD in December 2019, we have taken action to make sure that share classes are clear, transparent and appropriate for customers. We believe the funds have a simple, easily understood share class structure and provide equality for customers with the same characteristics.

We effectively offer two share classes across most of our newer funds, one for retail investors (Q class) and one for cross-investment (X class). Following a recent in-depth review of our charges, which examined both internal costs and those associated with third-party funds held within the portfolios, we have aligned all retail investors with the Q share class and reduced the charges of the X share classes of the Multi-Manager funds which are used for cross-holdings. This makes the charging structure more simplistic and transparent.

We believe that the available share classes effectively meet the needs of the diverse types of customers invested in each of the funds, ensuring that each investor is invested in the most suitable share class.



Economies of Scale

Do funds enjoy cost savings as they grow?

As a fund grows, the costs of running it can increase, like the need for more resources to manage risks and liquidity. However, these costs usually don't rise as quickly as the fund's revenues, creating economies of scale. This also happens at an overall level where we would expect our total costs to rise less quickly than our total revenues as total Assets under Management (AUM) grows. We check if our funds are benefiting from economies of scale and if these savings can be passed on to our customers.

In order to assess this, we examine the costs of each fund to see how they change as the fund grows. We also consider how the overall SPW (ACD) revenues and costs have changed over time.

General Conclusions and Observations

Following our review, we concluded that the ACD is profitable and sustainable but not making excess operating margin. Given our modest size, no substantial, long-term economies of scale have been realised for most funds and we have not identified any individual funds that make excess profits at a fund profitability level.

We found that, for this pillar, 21 of our funds delivered value, and for four funds we identified that economies of scale could be passed on to investors. The realignment and simplification of the charging structure of the Multi-Manager funds into which the Solution funds largely invest, and a reduction in the transfer agency costs has enabled us to rationalise the profitability of the Solution funds through a reduction of the Annual Management Charge (AMC).

For our Solution fund range, which is closed to new investments and experiencing a decrease in size, we previously identified ways to improve outcomes for customers invested in sub-optimally sized funds. In October 2023, we merged some of the smaller funds within this range through a scheme of arrangement.

We are providing economies of scale on our fund of funds ranges through leveraging our scale of AUM, and that of our delegated investment manager Schroder Investment Management Limited (SIML). This allows us to access more cost-effective share

classes of third-party funds. Similarly, for our Multi-Manager funds, the scale of our AUM has enabled us to negotiate lower investment management fees for the underlying sub-advisers.

We are also reinvesting to enhance the fund range and improve services for customers through a significant product development programme across our fund range. A major project was undertaken to appoint a new Transfer Agent in June 2024. This aims to improve our customer service and communication tools, offering better support and an upgraded online service portal. These enhancements not only enhance the investor experience but also contribute to the long-term success and sustainability of the funds.

The recent enhancements to the fund range should also support the potential for economies of scale going forwards, although it is too early in the programme to identify specific savings. We will continue to review the charging structure and through our established governance and periodic reviews, aim to leverage future growth in our funds' AUM to reduce costs and pass the savings on to our customers.



Authorised Fund Manager (AFM) Costs

Are the fees charged to the fund reasonable and appropriate?

We have considered whether the charges of services we provide are appropriate for our customers. We assess the cost to us of providing the service and compare this to what we charge to the customer to ensure that the costs and charges are fair. This ensures that the fund fees and charges remain appropriate and fair for our customers' investment(s) whilst at the same time allow us to continue to operate as a financially resilient firm, which can withstand shocks and continue to innovate and develop new products and services for our customers.

General Conclusions and Observations

We regularly review our costs and fee structures to ensure that they offer value for customers. After a comprehensive review, and in conjunction with actions outlined under Comparable Market Rates and Economies of Scale, for this pillar we conclude that all 25 of our funds provided value.

All costs to the funds are considered and where a third party provides services to a fund these costs are paid by the fund's assets. We have also assessed whether the costs for services provided by delegated third parties are fair to make sure that we continue to deliver cost effective services to customers. Our findings suggest our fund range is appropriately priced based on the costs incurred by the fund including costs allocated by us, the AFM.

Key services provided by SPW ACD as the AFM include:

- Investment Process: Maintaining oversight of the funds, monitoring fund managers, defining our investment approach, and applying our investment beliefs to deliver positive customer outcomes.
- Risk Management: Ensuring the safety of customer assets.
- Systems and Processes Maintenance: Managing systems, processes, and third parties involved in our oversight of the funds.
- Customer Service: Handling calls, resolving queries, managing customer administration activities, and maintaining the SPW (ACD) online service portal.

Following a review of the fees for our Multi-Manager fund range, we are changing how we calculate and charge the management and operation fees. We aim to provide greater simplicity and clarity with our new approach. This simplified method will make it easier for investors to understand our charges, including what we pay from these fees, who covers the Investment Adviser's (and any sub-advisers') fees, and the source of fund-related costs. The simplified Annual Management Charge (AMC) now covers Investment Adviser and major service fees, which were previously charged separately to the funds.

As part of our ongoing oversight, we will continue to review the costs and charges of the funds to identify any opportunities to make savings and improve transparency for customers.



Quality of Service

Are we meeting expectations on the service that we deliver?

We aim to add value for our customers in three main areas: fund operations, customer experience, and the investment process/resources. To assess whether we have provided value in these areas, we evaluate various factors, including:

- The performance of our key third-party service providers
- The quality of our investment oversight and work of the Investment Committee
- The quality of our customer communications
- The service our customers receive

General Conclusions and Observations

We believe that all our funds deliver good value in terms of service provided and we will continue to review and look for ways to improve the services provided to our clients, particularly by further developing our online offerings and customer communications.

Our SPW (ACD) team aims to ensure that the funds operate efficiently and accurately to provide positive outcomes for our customers. This includes overseeing and challenging activities contracted to third parties, such as the Depositary, Custodian, Transfer Agent, and Fund Administrator. We monitor whether key aspects have been met for each supplier and believe they are delivering a service that meets our expectations and those of our customers. This supplier oversight is a key area of governance for us to ensure that our customers and the funds receive value and achieve the right outcomes.

Our review of investment oversight demonstrates a robust framework for fund oversight and risk management, and we are pleased that the service provided by our delegated investment manager, Schroder Investment Management Limited (SIML), has led to good customer outcomes. We also highlight the work undertaken by the Investment Committee this year in developing the fund range as part of the Leading Investment Offering programme.

In 2024 we changed our Transfer Agent supplier with the aim of improving the service we provide to our customers. This change includes an enhanced online service portal and the introduction of a free phone number for our Customer Services Centre. Our new supplier will enable improved Vulnerable Customer identification and support including the capability to make service adjustments tailored to our customers' needs.

The FCA's Consumer Duty rules were implemented in 2023, focusing on consumer outcomes designed to drive up standards of care. Our business exists to help our customers and change lives, so the goals of Consumer Duty already align with our own. We continue to build on our existing governance and customer service to ensure we embed the rules and expectations throughout the business and in everything we do.

Our close relationship with SPW's advice business gives us particular insight into the customer experience and provides a valuable source of feedback on areas such as service and performance. This feedback is gathered through meetings with advisers and customer experience surveys.

Summary of results

The results for each pillar by fund is illustrated in the following diagram:

		Performance	Comparable Market Rates	Classes of Shares	Economies of Scale	AFM Costs General	Quality of Service
Portfolio	SPW Cautious Portfolio	Yellow	Green	Green	Green	Green	Green
	SPW Discovery Portfolio	Yellow	Green	Green	Green	Green	Green
	SPW Balanced Portfolio	Yellow	Green	Green	Green	Green	Green
	SPW Progressive Portfolio	Yellow	Green	Green	Green	Green	Green
	SPW Dynamic Portfolio	Yellow	Green	Green	Green	Green	Green
	SPW Adventurous Portfolio	Yellow	Green	Green	Green	Green	Green
Solution	SPW Cautious Solution	Red	Red	Green	Yellow	Green	Green
	SPW Discovery Solution	Yellow	Green	Green	Yellow	Green	Green
	SPW Balanced Solution	Yellow	Yellow	Green	Yellow	Green	Green
	SPW Dynamic Solution	Yellow	Yellow	Green	Yellow	Green	Green
Managed	SPW MM Global Real Estate Securities	Green	Green	Green	Green	Green	Green
	SPW MM Asia ex Japan & Global Emerging Markets Equity	Red	Green	Green	Green	Green	Green
	SPW MM North American Equity	Yellow	Green	Green	Green	Green	Green
	SPW MM European ex UK Equity	Yellow	Green	Green	Green	Green	Green
	SPW MM Japanese Equity	Green	Green	Green	Green	Green	Green
	SPW MM UK Equity	Yellow	Green	Green	Green	Green	Green
	SPW MM UK Equity Income	Green	Green	Green	Green	Green	Green
	SPW MM Global Investment Grade Bond	Yellow	Green	Green	Green	Green	Green
	SPW MM Global High Income & Emerging Markets Bond	Yellow	Green	Green	Green	Green	Green
	SPW Multi-Manager Global Sovereign Bond	Yellow	Green	Green	Green	Green	Green
	SPW Global Corporate Low Duration Bond	Blue	Green	Green	Green	Green	Green
SPW Global Government Low Duration Bond	Blue	Green	Green	Green	Green	Green	
Component	SPW IPS Growth Portfolio	Yellow	Green	Green	Green	Green	Green
	SPW IPS Income Portfolio	Yellow	Green	Green	Green	Green	Green
	SPW Asset Allocator	Yellow	Green	Green	Green	Green	Green

Pillar assessment key

■ Fund provided value.
 ■ Fund provides reasonable value and may merits action.
 ■ Fund does not provide value, action planned/action taken.
 ■ Less than 12 months performance history, too early to assess.

How to read your fund page

To help you make the most of the Assessment of Value and the individual fund commentary pages, we have created the following guide to highlight the key areas.

Benchmark

The performance comparator of the fund. Where the benchmark is a composite, the full components are listed in the fund's KIID or prospectus.

Overall Assessment

Our conclusions take into account the assessments for all six pillars. This contributes to an overall assessment as to whether or not we believe the fund delivers value to our customers.

Performance Data

Here you can find the fund's performance data up to the end of June 2024.

Pillar Assessment

The assessment of each of the six pillars is summarised here. The colours denote the outcome of each pillar.

Pillar Key Definitions of the pillar assessment colours

Assessment of Value report 2024

SPW Adventurous Portfolio

Objective: The fund aims to provide capital growth and income in excess of the benchmark (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.

Benchmark: Composite benchmark

Overall Assessment: The fund is delivering value overall and the charges are justified with no action identified.

Performance Data (% annualised)	Since Inception (15/07/20)
Fund	10.88
Benchmark	10.97
Peers	7.48

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:
The fund is close to reaching the stated investment period. The performance of the fund has been impacted by periods of volatility and style drivers in markets and we have a reasonable level of confidence that the fund will deliver the expected outcomes over the stated investment period, noting that the fund's performance is ahead of its peers. We continue to believe that the current investment strategy is appropriate and should deliver good outcomes to investors in the future.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund's AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund's charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.

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Objective The set of goals for the fund.

Name of the fund You can review the reports for each fund in which you are invested.

Navigation The home icon in the bottom right of each page will redirect you to the contents page. You will also see the direction arrows to take you to the previous, or next page.

To access the SPW KIIDs and Factsheets please visit www.spw.com/our-services/fund-info

The Six Pillars Analysis for each of the six pillars, including proposed actions or actions taken.

Portfolio funds overview

The Portfolio funds are a multi-asset fund-of-funds range that provides our customers with a low-cost solution for savings and retirement investment.

The majority of each Portfolio fund's assets is invested in funds provided by Schroder Investment Management Limited (SIML), with the balance invested in third-party index-tracking funds.

One of the main contributors to returns in a multi-asset fund is its asset allocation: the way it combines different types of investment. This can be split into long-term views or a strategic asset allocation (SAA), and short-term views or a tactical asset allocation (TAA). A SAA typically takes a five-to-ten-year view of potential investment returns, while a TAA focuses on what might happen over the next 12 months. The second main contributor is selecting the right funds and other investments.

The investment objective of each fund is to outperform its respective composite benchmark over five to seven years. Performance is expected to derive from both fund selection and asset allocation.



Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Cautious Portfolio

Objective: The Fund aims to provide capital growth and income in excess of the benchmark (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.

Benchmark: Composite benchmark

Overall Assessment: The fund is delivering value overall and the charges are justified with no action identified.

Performance Data (% annualised)	Since Inception (15/07/20)
Fund	1.17
Benchmark	1.72
Peers	1.37

Returns to 30/06/2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

The fund is close to reaching the stated investment period. The performance of the fund has been impacted by periods of market volatility and economic challenges and we have a reasonable level of confidence that the fund will deliver the expected outcomes over the stated investment period. We continue to believe that the current investment strategy is appropriate and should deliver good outcomes to investors in the future.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund’s AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.





Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Discovery Portfolio

Objective: The Fund aims to provide capital growth and income in excess of the benchmark (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.

Benchmark: Composite benchmark

Overall Assessment: The fund is delivering value overall and the charges are justified with no action identified.

Performance Data (% annualised)	Since Inception (15/07/20)
Fund	2.97
Benchmark	3.55
Peers	1.37

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

The fund is close to reaching the stated investment period. The performance of the fund has been impacted by periods of market volatility and economic challenges and we have a reasonable level of confidence that the fund will deliver the expected outcomes over the stated investment period, noting that the fund’s performance is ahead of its peers. We continue to believe that the current investment strategy is appropriate and should deliver good outcomes to investors in the future.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund’s AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.





Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Balanced Portfolio

Objective: The Fund aims to provide capital growth and income in excess of the benchmark (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.

Benchmark: Composite benchmark

Overall Assessment: The fund is delivering value overall and the charges are justified with no action identified.

Performance Data (% annualised)	Since Inception (15/07/20)
Fund	5.09
Benchmark	5.60
Peers	3.68

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

The fund is close to reaching the stated investment period. The performance of the fund has been impacted by periods of market volatility and economic challenges and we have a reasonable level of confidence that the fund will deliver the expected outcomes over the stated investment period, noting that the fund’s performance is ahead of its peers. We continue to believe that the current investment strategy is appropriate and should deliver good outcomes to investors in the future.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund’s AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.





Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Progressive Portfolio

Objective: The Fund aims to provide capital growth and income in excess of the benchmark (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.

Benchmark: Composite benchmark

Overall Assessment: The fund is delivering value overall and the charges are justified with no action identified.

Performance Data (% annualised)	Since Inception (15/07/20)
Fund	8.00
Benchmark	8.18
Peers	5.78

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

The fund is close to reaching the stated investment period. The performance of the fund has been impacted by periods of market volatility and economic challenges and we have a reasonable level of confidence that the fund will deliver the expected outcomes over the stated investment period, noting that the fund’s performance is ahead of its peers. We continue to believe that the current investment strategy is appropriate and should deliver good outcomes to investors in the future.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund’s AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.





Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Dynamic Portfolio

Objective: The Fund aims to provide capital growth and income in excess of the benchmark (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.

Benchmark: Composite benchmark

Overall Assessment: The fund is delivering value overall and the charges are justified with no action identified.

Performance Data (% annualised)	Since Inception (15/07/20)
Fund	9.32
Benchmark	9.38
Peers	7.48

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

The fund is close to reaching the stated investment period. The performance of the fund has been impacted by periods of volatility and style drivers in markets and we have a reasonable level of confidence that the fund will deliver the expected outcomes over the stated investment period, noting that the fund’s performance is ahead of its peers. We continue to believe that the current investment strategy is appropriate and should deliver good outcomes to investors in the future.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund’s AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.





Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Adventurous Portfolio

Objective: The Fund aims to provide capital growth and income in excess of the benchmark (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.

Benchmark: Composite benchmark

Overall Assessment: The fund is delivering value overall and the charges are justified with no action identified.

Performance Data (% annualised)	Since Inception (15/07/20)
Fund	10.88
Benchmark	10.97
Peers	7.48

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

The fund is close to reaching the stated investment period. The performance of the fund has been impacted by periods of volatility and style drivers in markets and we have a reasonable level of confidence that the fund will deliver the expected outcomes over the stated investment period, noting that the fund’s performance is ahead of its peers. We continue to believe that the current investment strategy is appropriate and should deliver good outcomes to investors in the future.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund’s AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.



SPW Solution funds overview

Our Solution funds are multi-asset funds of funds investing in a combination of third-party funds and the SPW Managed funds. We became the ACD of the Solution funds in December 2019.

While the benchmarks for each fund closely resemble those of our Portfolio funds, the composition of the funds themselves is quite different. Where the majority of each Portfolio fund's assets is invested in funds provided by Schroder Investment Management Limited (SIML), with the balance invested in third-party index-tracking funds, the Solution funds have used an open architecture approach to manager selection via the SPW Multi-Manager funds.

The investment objective of each fund is to outperform its respective composite benchmark over five to seven years. Performance is expected to derive from both fund selection and asset allocation. We review the strategic asset allocation of all multi-asset funds every year with the aim of maximising the potential returns for each fund while maintaining the same levels of risk.



Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Cautious Solution

Objective: The fund aims to provide capital growth and income in excess of the benchmark (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.

Benchmark: Composite benchmark

Overall Assessment: We recognise that the fund has not delivered value. However, management have taken actions that are sufficiently impactful that we are confident that the fund will deliver value going forwards, and that it remains a suitable product for cautious investors.

Performance Data (% annualised)	Since Inception (09/12/19)
Fund	0.28
Benchmark*	1.16
Peers	1.38

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated. *Benchmark available from March 2021, internal SAA used prior to this date.

Performance:

The fund is close to reaching the stated investment period since inception of SPW (ACD) and we do not expect the fund to fully meet the outcomes over the stated investment period. **Action Taken:** The strategic asset allocation was changed in May 2024, and we believe that the current investment strategy, supported by recent fixed income fund launches into which the Cautious Solution fund invests, is appropriate and should deliver good outcomes to investors in the future.

Comparable Market Rates: The fund is in the higher fee bracket in comparison to Peers, however, as a fund of funds, the synthetic fee (including the OCFs of any underlying funds) is a key element driving the higher ongoing charge figure. While an additional cost, this gives customers exposure to a range of high-quality funds and investment strategies. **Action Taken:** The costs of accessing the fund’s underlying investments have been reduced which will reduce the OCF going forwards.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Following a review of the profitability of the fund and the overall profitability of the ACD we have identified an opportunity to pass on an economies of scale. **Action Taken:** To enhance the value delivered by the fund, we are reducing the fund’s Annual Management Charge (AMC) by 0.10%.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.





Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Discovery Solution

Objective: The Fund aims to provide capital growth and income in excess of the benchmark (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.

Benchmark: Composite benchmark

Overall Assessment: The fund is delivering value overall and the charges are justified, however areas for improvement have been identified and actions have already been undertaken, or will shortly be undertaken, to address these areas.

Performance Data (% annualised)	Since Inception (09/12/19)
Fund	1.50
Benchmark*	2.24
Peers	1.38

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated. *Benchmark available from March 2021, internal SAA used prior to this date.

Performance:

The fund is close to reaching the stated investment period since inception of SPW (ACD). The performance of the fund has been impacted by periods of market volatility and economic challenges. However given the positive benefits of the LIO programme, we continue to believe that the investment strategy is appropriate and that on a forward-looking basis we have a good degree of confidence that the fund will meet its investment objectives to the benefit of investors. **Action Taken:** The strategic asset allocation was changed in May 2024, and we continue to believe that the current investment

strategy, supported by recent fixed income fund launches into which the Discovery fund invests, is appropriate and should deliver good outcomes to investors in the future.

Comparable Market Rates: The fund is in the higher fee bracket in comparison to Peers, however, as a fund of funds, the synthetic fee (including the OCFs of any underlying funds) is a key element driving the higher ongoing charge figure. While an additional cost, this gives customers exposure to a range of high-quality funds and investment strategies. **Action Taken:** The costs of accessing the fund’s underlying investments have been reduced which will reduce the OCF going forwards.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Following a review of the profitability of the fund and the overall profitability of the ACD we have identified an opportunity to pass on an economies of scale. **Action Taken:** To enhance the value delivered by the fund, we are reducing the fund’s Annual Management Charge (AMC) by 0.10%.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.





Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Balanced Solution

Objective: The Fund aims to provide capital growth and income in excess of the benchmark (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.

Benchmark: Composite benchmark

Overall Assessment: The fund is delivering value overall and the charges are justified, however areas for improvement have been identified and actions have already been undertaken, or will shortly be undertaken, to address these areas.

Performance Data (% annualised)	Since Inception (09/12/19)
Fund	2.92
Benchmark*	3.78
Peers	2.93

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated. *Benchmark available from March 2021, internal SAA used prior to this date.

Performance:

The fund is close to reaching the stated investment period since inception of SPW (ACD). The performance of the fund has been impacted by periods of market volatility and economic challenges. However given the positive benefits of the LIO programme, we continue to believe that the investment strategy is appropriate and that on a forward-looking basis we have a good degree of confidence that the fund will meet its investment objectives to the benefit of investors. **Action Taken:** The strategic asset allocation was changed in May 2024, and we continue to believe that the current investment strategy should deliver good outcomes to investors in the future.

Comparable Market Rates: The fund is in the higher fee bracket in comparison to Peers, however, as a fund of funds, the synthetic fee (including the OCFs of any underlying funds) is a key element driving the higher ongoing charge figure. While an additional cost, this gives customers exposure to a range of high-quality funds and investment strategies. **Action Taken:** The costs of accessing the fund’s underlying investments have been reduced which will reduce the OCF going forwards.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Following a review of the profitability of the fund and the overall profitability of the ACD we have identified an opportunity to pass on an economies of scale. **Action Taken:** To enhance the value delivered by the fund, we are reducing the fund’s Annual Management Charge (AMC) by 0.15%.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.





Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Dynamic Solution

Objective: The Fund aims to provide capital growth and income in excess of the benchmark (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.

Benchmark: Composite benchmark

Overall Assessment: The fund is delivering value overall and the charges are justified, however areas for improvement have been identified and actions have already been undertaken, or will shortly be undertaken, to address these areas.

Performance Data (% annualised)	Since Inception (09/12/19)
Fund	6.01
Benchmark*	6.31
Peers	6.20

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated. *Benchmark available from March 2021, internal SAA used prior to this date.

Performance:

The fund is close to reaching the stated investment period since inception of SPW (ACD). The performance of the fund has been impacted by periods of volatility and style drivers in markets. However given the positive benefits of the LIO programme, we continue to believe that the investment strategy is appropriate and that on a forward-looking basis we have a good degree of confidence that the fund will meet its investment objectives to the benefit of investors.

Action Taken: The strategic asset allocation was changed in May 2024, and we believe that the new investment strategy is appropriate and should deliver good outcomes to investors in the future.

Comparable Market Rates: The fund is in the higher fee bracket in comparison to Peers, however, as a fund of funds, the synthetic fee (including the OCFs of any underlying funds) is a key element driving the higher ongoing charge figure. While an additional cost, this gives customers exposure to a range of high-quality funds and investment strategies. **Action Taken:** The costs of accessing the fund’s underlying investments have been reduced which will reduce the OCF going forwards.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Following a review of the profitability of the fund and the overall profitability of the ACD we have identified an opportunity to pass on an economies of scale. **Action Taken:** To enhance the value delivered by the fund, we are reducing the fund’s Annual Management Charge (AMC) by 0.15%.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.



SPW Multi-Manager funds overview

The SPW Multi-Manager funds offer a range of single asset class funds, including equity, fixed income, and property investments. Currently, these funds are not distributed as standalone investments. Instead, SPW (Advice Company) uses them in model portfolios, the SPW Solution funds and SPW Component funds also invest in these funds.

We recently changed the way these funds are managed. Previously, the Investment Adviser, Schroder Investment Management Limited (SIML), delegated the management of some of the assets to third-party investment management firms, known as sub-advisers. Going forward, SIML will manage the assets directly, without the use of sub-advisers. As a result of this change, the funds have since been updated to remove 'Multi-Manager' from their name.



Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service
- Overall

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Multi-Manager Global Real Estate Securities Fund *

Objective: The fund aims to provide income and capital growth in excess of the MSCI World Investable Market Core Real Estate (Net Total Return) index (after fees have been deducted) over five to seven years by investing in property securities worldwide.

Benchmark: MSCI World Investable Market Core Real Estate Index

Overall Assessment: The fund is delivering value overall and the charges are justified with no action identified. The fund closed on 7 October 2024.

Performance Data (% annualised)	Since Inception (09/12/19)
Fund	0.52
Benchmark	-0.95
Peers	-1.00

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

The fund is close to reaching the stated investment period since inception of SPW (ACD). The performance of the fund is good. We expect that the fund will ultimately deliver the expected outcomes over the stated investment period.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund's AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund's charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.

*** Note: This fund closed on 7 October 2024 as part of the major fund transformation programme**



Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service
- Overall

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Multi-Manager Asia ex Japan & Global Emerging Markets Equity Fund*

Objective: The fund aims to provide capital growth and income in excess of the custom benchmark (after fees have been deducted) over five to seven years by investing in the equities of companies in the Asia Pacific region (excluding Japan) and in global emerging markets.

Benchmark: 50% MSCI Emerging Markets Index and 50% MSCI AC Asia ex Japan Index

Overall Assessment: The fund has not delivered value in the performance area. This assessment is based on a track record of three years which, while providing a meaningful indication of performance for this assessment, is short of the investment period. Please note that this fund has now been merged into the new Global (ex UK) Equity fund (see below).

Performance Data (% annualised)	Since Inception (09/07/21)
Fund	-3.45
Benchmark	-0.54
Peers	n/a

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

Although short of the investment period, the performance history is meaningful, and we do not expect the fund to fully meet the outcomes over the stated investment period as performance has been materially impacted by periods of market volatility and economic challenges.

Action Taken: Management had been working with the delegated investment manager to enhance performance of the fund. However, we have decided to move to a global rather a regional approach to equities, which we believe will improve overall client outcomes. As result, this fund is now closed and merged with other regional equity funds into a new Global (ex-UK) Equity fund.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund's AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund's charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.

* Note: This fund was merged into the SPW Global (ex UK) Equity fund via a scheme of arrangement on 5th October 2024



Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service
- Overall

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Multi-Manager North American Equity Fund *

Objective: The fund aims to provide capital growth and income in excess of the MSCI North America (Net Total Return) index (after fees have been deducted) over five to seven years by investing in the equities of North American companies.

Benchmark: MSCI North America Index

Overall Assessment: The fund is delivering value overall and charges are justified.

Performance Data (% annualised)	Since Inception (09/07/21)
Fund	10.46
Benchmark	11.19
Peers	9.84

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

The performance history is meaningful in the context of the expected investment period. The performance of the fund has been impacted by periods of volatility and style drivers in markets. However given the positive actions taken as part of the programme of major fund transformation, we believe that the investment strategy is appropriate and that on a looking forward basis we are confident that the fund will meet its investment objectives. **Action Taken:** To enhance customer outcomes, this fund, along with other regional equity funds, was merged into the SPW Global (ex UK) Equity fund via a scheme of arrangement on 5th October 2024

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund’s AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.

* Note: This fund was merged into the SPW Global (ex UK) Equity fund on 5th October 2024



Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service
- Overall

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Multi-Manager European ex UK Equity Fund *

Objective: The fund aims to provide capital growth and income in excess of the MSCI Europe ex UK (Net Total Return) index (after fees have been deducted) over five to seven years by investing in the equities of European companies, excluding the UK.

Benchmark: MSCI Europe ex UK NR Index

Overall Assessment: The fund is delivering value overall and charges are justified.

Performance Data (% annualised)	Since Inception (09/07/21)
Fund	5.60
Benchmark	5.83
Peers	5.69

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

The performance history is meaningful in the context of the expected investment period. The performance of the fund has been impacted by periods of volatility and style drivers in markets. However given the positive actions taken as part of the programme of major fund transformation, we believe that the investment strategy is appropriate and that on a looking forward basis we are confident that the fund will meet its investment objectives. **Action Taken:** To enhance customer outcomes, this fund, along with other regional equity funds, was merged into the SPW Global (ex UK) Equity fund via a scheme of arrangement on 5th October 2024.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund’s AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.

* Note: This fund was merged into the SPW Global (ex UK) Equity fund on 5th October 2024



Pillar Assessment

- + Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service
- Overall

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Multi-Manager Japanese Equity Fund *

Objective: The fund aims to provide capital growth and income in excess of the MSCI North America (Net Total Return) index (after fees have been deducted) over five to seven years by investing in the equities of North American companies.

Benchmark: MSCI Japan NR Index

Overall Assessment: The fund is delivering value overall and charges are justified.

Performance Data (% annualised)	Since Inception (09/07/21)
Fund	7.43
Benchmark	5.73
Peers	4.75

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

The performance history is meaningful in the context of the expected investment period. The performance of the fund is good. We expect that the fund will ultimately deliver the expected outcomes over the stated investment period. **Action Taken:** To enhance customer outcomes, this fund, along with other regional equity funds, was merged into the SPW Global (ex UK) Equity fund via a scheme of arrangement on 5th October 2024.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund’s AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.

* Note: This fund was merged into the SPW Global (ex UK) Equity fund on 5th October 2024



Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service
- Overall

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Multi-Manager UK Equity Fund

Objective: The fund aims to provide capital growth and income in excess of the MSCI UK Investable Market (Gross Total Return) index (after fees have been deducted) over five to seven years by investing in the equities of UK companies.

Benchmark: MSCI UK Investable Market Index

Overall Assessment: The fund is delivering value overall and charges are justified.

Performance Data (% annualised)	Since Inception (09/12/19)
Fund	5.93
Benchmark	6.19
Peers	4.75

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

The fund is close to reaching the stated investment period since inception of SPW (ACD). The performance of the fund has been impacted by periods of volatility and style drivers in markets. However given the positive actions taken as part of the programme of major fund transformation, we believe that the investment strategy is appropriate and that on a looking forward basis we are confident that the fund will meet its investment objectives, noting that the fund is ahead of its peers. **Action Taken:** As part of the transition from Multi-Manager to multi-strategy we have recently changed the underlying investment manager of the fund to Schroder Investment Management Limited (SIML).

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund’s AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.



Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs

- Quality of Service
- Overall

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Multi-Manager UK Equity Income Fund *

Objective: The fund aims to provide income and capital growth in excess of the MSCI UK Investable Market (Gross Total Return) index (after fees have been deducted) over five to seven years by investing in the equities of UK companies. The fund will also aim to provide a dividend yield that is at least equal to that of the MSCI UK Investable Market (GTR) index on a three year rolling basis.

Benchmark: MSCI UK Investable Market Index

Overall Assessment: The fund is delivering value overall and charges are justified.

Performance Data (% annualised)	Since Inception (09/12/19)
Fund	7.39
Benchmark	6.19
Peers	5.26

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

The fund is close to reaching the stated investment period since inception of SPW (ACD). The performance of the fund is good. We expect that the fund will ultimately deliver the expected outcomes over the stated investment period in terms of both total return and delivering an income which is at least equal to the benchmark.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund's AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund's charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.

*** Note: This fund closed on 24 October 2024 as part of the major fund transformation programme**



Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service
- Overall

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Multi-Manager Global Investment Grade Bond Fund

Objective: The fund aims to provide income and capital growth in excess of Bloomberg Global Aggregate Corporate (Total Return) Value GBP Hedged index (after fees have been deducted) over five to seven years by investing in a range of bonds issued by companies worldwide.

Benchmark: Bloomberg Global Aggregate Corporate Index

Overall Assessment: The fund is delivering value overall and charges are justified.

Performance Data (% annualised)	Since Inception (09/07/21)
Fund	-2.29
Benchmark	-2.20
Peers	-2.16

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

The performance history is meaningful in the context of the expected investment period. The performance of the fund has been impacted by periods of market volatility and economic challenges. However given the positive actions taken as part of the programme of major fund transformation, we believe that the investment strategy is appropriate and that on a looking forward basis we are confident that the fund will meet its investment objectives. **Action Taken:** As part of the transition from Multi-Manager to multi-strategy we have recently changed the underlying investment manager of the fund to Schroder Investment Management Limited (SIML).

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund’s AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.



Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service
- Overall

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Multi-Manager Global High Income & Emerging Markets Bond Fund

Objective: The fund aims to provide income and capital growth in excess of the composite benchmark (after fees have been deducted) over five to seven years by investing in a range of bonds issued by governments and companies worldwide.

Benchmark: The composite benchmark comprises 50% Bloomberg Global High Yield Corporate (Total Return) Value GBP Hedged index and 50% Bloomberg Emerging Market Debt (Total Return) Value GBP Hedged index.

Overall Assessment: The fund is delivering value overall and charges are justified.

Performance Data (% annualised)	Since Inception (09/07/21)
Fund	-1.03
Benchmark	-0.52
Peers	n/a

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

The performance history is meaningful in the context of the expected investment period. The performance of the fund has been impacted by periods of market volatility and economic challenges. However given the positive actions taken as part of the programme of major fund transformation, we believe that the investment strategy is appropriate and that on a looking forward basis we are confident that the fund will meet its investment objectives. **Action Taken:** In August 2024, we materially changed the investment strategy of the fund to focus on High Yield bonds and as part of the transition from

Multi-Manager to multi-strategy, we have also recently changed the underlying investment manager of the fund to Schroder Investment Management Limited (SIML).

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund’s AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.



Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service
- Overall

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Multi-Manager Global Sovereign Bond Fund

Objective: The fund aims to provide income and capital growth in excess of the Bloomberg Global Aggregate Treasury (Total Return) Value GBP Hedged index (after fees have been deducted) over five to seven years by investing in a range of bonds issued or guaranteed by governments worldwide.

Benchmark: Bloomberg Global Aggregate Treasury Index

Overall Assessment: The fund is delivering value overall and charges are justified.

Performance Data (% annualised)	Since Inception (09/07/21)
Fund	-2.16
Benchmark	-1.93
Peers	-2.06

Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

The performance history is meaningful in the context of the expected investment period. The performance of the fund has been impacted by periods of market volatility and economic challenges. However given the positive actions taken as part of the programme of major fund transformation, we believe that the investment strategy is appropriate and that on a looking forward basis we are confident that the fund will meet its investment objectives. **Action Taken:** As part of the transition from Multi-Manager to multi-strategy we have recently changed the underlying investment manager of the fund to Schroder Investment Management Limited (SIML).

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund’s AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.



Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service
- Overall

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Global Corporate Low Duration Bond Fund

Objective: The Fund aims to provide income and capital growth in excess of the Bloomberg Global Aggregate Corporate 1-5 Year (Total Return) GBP Hedged index (after fees have been deducted) over five to seven years by investing in a range of bonds issued by companies and governments worldwide.

Benchmark: Bloomberg Global Aggregate Corporate 1-5 Year (Total Return) GBP Hedged Index

Overall Assessment: The fund has been recently launched and it is too early to assess performance, however based on the product design, the fund is delivering value overall and charges are justified with no action identified.

Performance:

The fund was launched on 31/01/2024. There is an insufficient period of fund performance history based on which the ACD can make a meaningful and appropriate assessment.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund's AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund's charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.



Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service
- Overall

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Global Government Low Duration Bond Fund

Objective: The Fund aims to provide income and capital growth in excess of the Bloomberg Global Aggregate Government 1-5 Year (Total Return) GBP Hedged index (after fees have been deducted) over five to seven years by investing in a range of bonds issued by governments worldwide

Benchmark: Bloomberg Global Aggregate Government 1-5 Year (Total Return) GBP Hedged Index

Overall Assessment: The fund has been recently launched and it is too early to assess performance, however based on the product design, the fund is delivering value overall and charges are justified with no action identified.

Performance:

The fund was launched on 23/05/2024. There is an insufficient period of fund performance history based on which the ACD can make a meaningful and appropriate assessment.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund's AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund's charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.

SPW Component funds overview

Three of our funds, SPW Asset Allocator, SPW IPS Growth and SPW IPS Income are specifically designed to be used as component funds in conjunction with other funds in various proportions to create model portfolios aligned to different risk profiles. The funds invest in the SPW Multi-Manager funds.

The Component funds are not designed to be standalone funds and are not distributed as such.

Each component fund has an internal strategic asset allocation (SAA) but no benchmark, so we have conducted our assessment using the fund's Strategic Asset Allocation.



Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service
- Overall

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW IPS Growth Portfolio

Objective: The fund aims to provide income and capital growth by investing in a diversified range of assets and markets worldwide.

Overall Assessment: The fund is delivering value overall and charges are justified with. However, we continue to review and look for opportunities to enhance the value delivered by the fund.

Performance Data (% annualised)	Since Inception (09/12/19)
Fund	7.94
Benchmark*	8.44
Peers	n/a

*The fund does not have a benchmark and so the strategic asset allocation is used for comparison purposes. Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

We do not quote a benchmark or performance target for the fund and so the Strategic Asset Allocation is used for comparison purposes. The fund is specifically designed to be used as a component fund in conjunction with other funds in various proportions to create model portfolios aligned to different risk profiles. The fund is close to reaching the stated investment period since inception of SPW (ACD). Performance has been impacted by periods of market volatility and economic challenges. However given the actions taken as benefits of the LIO programme, we continue to believe that the investment strategy is appropriate and that on a forward-looking basis we have a good degree of confidence that the fund will meet its investment objectives to the benefit of investors. **Action Taken:** In August 2024 we simplified the investment strategy and removed alternative investments to improve the potential outcome for clients.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund’s AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.



Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service
- Overall

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW IPS Income Portfolio

Objective: The fund aims to provide income and capital growth by investing in a diversified range of assets and markets worldwide.

Overall Assessment: The fund is delivering value overall and charges are justified with. However, we continue to review and look for opportunities to enhance the value delivered by the fund.

Performance Data (% annualised)	Since Inception (09/12/19)
Fund	0.00
Benchmark*	0.69
Peers	n/a

*The fund does not have a benchmark and so the strategic asset allocation is used for comparison purposes. Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated.

Performance:

We do not quote a benchmark or performance target for the fund and so the Strategic Asset Allocation is used for comparison purposes. The fund is specifically designed to be used as a component fund in conjunction with other funds in various proportions to create model portfolios aligned to different risk profiles. The fund is close to reaching the stated investment period since inception of SPW (ACD). Performance has been impacted by periods of market volatility and economic challenges. However given the positive actions taken as part of the programme of major fund transformation, we believe that the investment strategy is appropriate and that on a looking forward basis we are confident that the fund will meet its investment objectives. **Action Taken:** In August 2024 we simplified the investment strategy and invested in newly launched fixed funds assets to improve the potential outcome for clients.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund’s AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.



Pillar Assessment

- Performance
- Comparable Market Rates
- Classes of Shares
- Economies of Scale
- AFM Costs
- Quality of Service
- Overall

Pillar Key

- Fund provides value.
- Fund provides reasonable value and may merit action.
- Fund does not provide value, action planned/ action taken.
- Less than 12 months performance history, too early to assess.

SPW Asset Allocator Fund *

Objective: The fund aims to provide capital growth and income by investing in a diversified range of assets and markets worldwide.

Overall Assessment: The fund is delivering value overall and charges are justified. However, we continue to review and look for opportunities to enhance the value delivered by the fund.

Performance Data (% annualised)	Since Inception (09/12/19)
Fund	3.04
Benchmark*	4.16
Peers	n/a

*The fund does not have a benchmark and so the strategic asset allocation is used for comparison purposes. Returns to 30th June 2024. Figures refer to past performance, which is not a guide to future performance and may not be repeated

Performance:

We do not quote a benchmark or performance target for the fund and so the Strategic Asset Allocation is used for comparison purposes. The fund is specifically designed to be used as a component fund in conjunction with other funds in various proportions to create model portfolios aligned to different risk profiles. The fund is close to reaching the stated investment period since inception of SPW (ACD). Performance has been impacted by periods of market volatility and economic challenges. However given the positive actions taken as part of the programme of major fund transformation, we believe that the investment strategy is appropriate and that on a looking forward basis we are confident that the fund will meet its investment objectives. **Action Taken:** In August 2024 we simplified the investment strategy and included lower duration assets to improve the

potential outcome for clients. To further improve customer outcomes, on 21st September 2024 the fund split into SPW Tactical Fund 1 and SPW Tactical Fund 2 to support different risk profiles.

Comparable Market Rates: Overall, we believe that the fund represents a competitive offering from a cost perspective relative to Peers and provides value on this pillar.

Classes of Shares: All available share classes have been reviewed, and investors are in the most suitable and cost-effective share class available to them.

Economies of Scale: Currently, the fund’s AUM is not sufficient to generate meaningful savings through economies of scale, therefore a scale discount has not been applied.

Authorised Fund Manager Costs (AFM): We reviewed every cost component of the fund’s charges at the share class level and concluded that, for each charge, the costs of providing the related service are reasonable and appropriate.

Quality of Service: Our review of key service areas, including fund operations, investment processes, customer experience, and liquidity management, demonstrates a robust framework for fund oversight and risk reporting. We received positive feedback from customer surveys and recently enhanced our online service portal to provide better support and functionality.

*** Note: This fund was split into SPW Tactical Fund 1 and SPW Tactical Fund 2 on 21st September 2024**

Funds closed since our last AoV report

In our 2023 Assessment of Value report we signalled that several funds were shortly to be closed. We have included these funds in the next section of this report for transparency, including the performance track record prior to closure.

Funds closed since our last AoV report

Defensive Solution, Strategic Solution and Adventurous Solution

In October 2023, we merged smaller funds within the Solution fund range through a scheme of arrangement to improve future customer outcomes. As a result, Defensive Solution, Strategic Solution, and Adventurous Solution were closed and consolidated into other funds within the range to ensure investors did not experience diseconomies of scale, here the costs of managing the fund became disproportionately high in relation to its size. Performance figures for the funds at the time of the scheme of arrangement are provided below.

Performance Data (% annualised)	Since Inception (09/12/19)
Defensive Solution	-2.70
Benchmark*	-1.57

Performance Data (% annualised)	Since Inception (09/12/19)
Strategic Solution	2.56
Benchmark*	3.10

Performance Data (% annualised)	Since Inception (09/12/19)
Adventurous Solution	4.38
Benchmark*	4.49

Returns to 30/09/2023. Figures refer to past performance, which is not a guide to future performance and may not be repeated. *Benchmark available from March 2021, internal SAA used prior to this date.

IPS Strategic Income Portfolio

As a legacy product, the fund's asset size had significantly reduced over time and the costs of managing the fund became disproportionately high in relation to its size. As a result, it was no longer possible to maintain the fund at a cost that would ensure value for investors. To protect clients' interests and avoid any negative impact on returns, the decision was made to close the fund. Performance figures for the fund at the time of close are provided below.

Performance Data (% annualised)	Since Inception (09/12/19)
AIPS Strategic Income Portfolio	-3.09
Benchmark*	0.45

Returns to 30/09/2023. Figures refer to past performance, which is not a guide to future performance and may not be repeated. The fund does not have a benchmark and so the internal SAA is used for comparison purposes.

Appendix and Glossary

ACD Peer Group references

Peer Groups: Where we have referenced Peer performance on the individual fund pages, the peer group used is provided below.

Fund	Peer Group
SPW Cautious Portfolio	Morningstar Category - GBP Allocation 20-40% Equity
SPW Discovery Portfolio	Morningstar Category - GBP Allocation 20-40% Equity
SPW Balanced Portfolio	Morningstar Category - GBP Allocation 40-60% Equity
SPW Progressive Portfolio	Morningstar Category - GBP Allocation 60-80% Equity
SPW Dynamic Portfolio	Morningstar Category - GBP Allocation 80%+ Equity
SPW Adventurous Portfolio	Morningstar Category - GBP Allocation 80%+ Equity
SPW Cautious Solution	Morningstar Category - GBP Allocation 20-40% Equity
SPW Discovery Solution	Morningstar Category - GBP Allocation 20-40% Equity
SPW Balanced Solution	Morningstar Category - GBP Allocation 40-60% Equity
SPW Dynamic Solution	Morningstar Category - GBP Allocation 80%+ Equity
SPW Multi-Manager Global Real Estate Securities	Morningstar Category - Property - Indirect Global
SPW Multi-Manager Asia ex Japan & Global Emerging Markets Equity	N/A
SPW Multi-Manager North America Equity	IA Sector North America
SPW Multi-Manager European ex UK	IA Europe Excluding UK
SPW Multi-Manager Japanese Equity	IA Japan
SPW Multi-Manager UK Equity	IA Sector UK All Companies
SPW Multi-Manager UK Equity Income	IA UK Equity Income
SPW Multi-Manager Global Investment Grade Bond	Morningstar Category Global Corporate Bond - GBP
SPW Multi-Manager Global High Income & Emerging Markets Bond	Morningstar Category Global High Yield Bond - GBP Hedged
SPW Multi-Manager Global Sovereign Bond	Morningstar Category Global Bond - GBP Hedged
SPW Global Corporate Low Duration Bond	N/A
SPW Global Government Low Duration Bond	N/A
SPW IPS Growth Portfolio	N/A
SPW IPS Income Portfolio	N/A
SPW Asset Allocator	N/A

Absolute Return The return an asset achieves over a specified period, without being compared to a benchmark or comparator. This measure is expressed as a percentage and for time periods greater than 12 months is annualised. For example, for £100 invested, a 10% absolute return over one year, would give a £10 return, taking the total to £110.

ACD (Authorised Corporate Director) An ACD is a corporate body which is given powers and duties under FCA regulations to operate an Investment Company with Variable Capital (ICVC). The ACD is responsible for administration and accountancy as well as providing the legal framework around the funds, including compliance.

Active Fund Unlike a passive fund, which seeks to match the return of an index, an active fund seeks to outperform the return of an index. It does this by investing in companies whose share price the manager thinks will increase more than that of the index.

Accumulation Share Class A share class that automatically reinvests its income (derived from dividends or interest of the underlying securities) back into the fund.

Authorised Fund Manager (AFM) Costs The costs that the Authorised fund manager incurs for running the fund.

All-in Charge A single charge that captures all of the costs of managing a fund, which include the annual management charge, the administration charge and other “operating costs”. The All-in charge represents a maximum charge – should costs exceed the stated All-in figure, the excess costs are borne by the ACD; should the costs be below the stated All-in figure, the difference will be paid into the fund. The All-In charge

does not include the costs of buying and selling the fund’s assets. Some of SPW’s funds have adopted an All-in charge approach.

Annual Management Charge (AMC) The annual fee taken by the fund manager for making investment decisions, usually a percentage of the amount invested.

Annualised An annualised rate of return is the return over a period of time, calculated down to a 12-month period. This scaling process allows customers to objectively compare the returns of any assets over any period.

Asset A resource or security with economic value that an individual, corporation or country owns or controls with the expectation that it will provide future benefit.

Asset Allocation This asset mix within a fund, usually broken down into equities (stocks), fixed income (bonds), cash and alternatives such as commodities or property. This may be broken down by geographic region or sector.

Assets Under Management (AUM) The total market value of the investments that a person or entity manages on behalf of customers.

Bps (basis points) A basis point is one hundredth of one per cent. For example, 10bps = 0.1%, 50bps = 0.5%.

Benchmark A standard, (usually an index or a market average) that an investment fund’s performance is measured against. A fund’s benchmark is usually disclosed in its prospectus. A composite benchmark is one that is comprised of different modules / indexes to create a benchmark more reflective of the fund itself.

Composite When referring to benchmarks, a composite is a collection of indices that may be weighted differently to create a truer benchmark for a particular fund to better reflect its investable universe.

Cross held (share class) Customers in this share class have the rights to hold these shares as a second scheme within a fund. To avoid double charging, an annual management charge is typically not levied on these shares. Access to this share class should only be granted if made from an appropriate primary scheme of SPW (ACD) or associated parties of SPW.

Custodian and Depository The Custodian and Depository are financial institutions which play an important role in investor protection and are responsible for the safekeeping of the fund’s assets including operational and compliance aspects of managing investment funds. Their role is to protect the fund’s assets and ensure they are managed in line with regulatory requirements and the fund’s prospectus. Their services help maintain the security and transparency of fund assets, providing confidence to investors and regulatory authorities.

Cyclicals Companies whose performance moves in line with the general health of the economy. Share prices are strong when growth is good but suffer severely during a recession. Examples are automobiles, construction, and manufacturing companies. These include aerospace and aerospace industries, building supplies, industrial-building products, business equipment, chemicals, machinery (both light and industrial), metals fabrication (iron, steel, coal, and rare metals), paper and packaging, and photo equipment.

Economies of Scale An economic principle stating that as the volume of production increases, the cost of producing each incremental unit decreases. As applied to the fund business, the implication is that as the assets in a fund increase, the percentage cost of managing and/or servicing those assets decreases.

Fettered funds A term usually used in relation to a fund of funds. It means the fund of funds is restricted to investing only in the internal funds run by the same fund management group. The opposite is an unfettered fund of funds.

Financial Conduct Authority (FCA) The FCA regulates authorised investment funds. The FCA is the UK regulator of Financial Services and requires firms to adhere to strict rules, principles and guidance.

Fixed Income Securities such as bonds on which the holder typically receives a predetermined interest pattern on the face value. However, the term is also used for debt securities even when there is no regular interest and when interest varies.

Fund Administrator Provide administrative solutions to asset and fund managers. This can include fund accounting, trade settlement and investor communications.

Fund of Funds A fund that invests the money raised from investors in a range of funds.

Fund Management Investment and administration of a quantity of money on behalf of the fund's owners.

Growth (Strategy) Refers to an investment strategy that selects shares with a record of past growth and the potential for future increases in capital value. Usually, that means companies with high growth in earnings or expected earnings, and hence the potential for big increases in their share price. If the company fails to deliver growth however, the price can fall dramatically.

Income Shares A share class that pays out its income (derived from dividends or interest of the underlying securities).

Index Fund A fund whose objective is to match the total investment performance of a publicly recognised securities market index. A fund designated as 'pure index' is passively managed and invests a majority of its assets in virtually all the securities of the targeted index, rebalancing regularly to mimic the proportions of the index. The performance of such a fund is likely to track its index very closely.

Investment Association (IA) and IA sectors

The Investment Association is the trade body that represents UK Investment managers. The IA maintains a classification scheme, IA sectors, that groups funds based on their investment objective.

Investment Objective The set goal / target for the fund, usually to aim to beat a benchmark or criteria over a specific time period.

Lloyds Banking Group (LBG) Advised Customers in this share class have the right to hold shares as part of a product managed by LBG but advised by SPW (Advice Company). This share class type should be reserved exclusively for the use of customers accessing shares via a commercial arrangement with SPW (Advice Company). The AMC is set at a suitable discount to the retail class to ensure the shares are commercially competitive and with consideration of other costs customers may bear in accessing this class.

Legacy Customers A legacy customer is an SPW (ACD) customer who purchased the fund either directly or via an advice event but who no longer has an ongoing relationship with the company that advised them. Legacy customers may include those advised by SPW (Advice Company), Lloyds Wealth or Scottish Widows. These customers typically hold the funds directly in their own name or via a separate nominee.

Mean The arithmetic average of a group of numbers. competitive and with consideration of other costs customers may bear in accessing this class.

Median A value in an ordered set of values (sorted from largest to smallest) below and above which there is an equal number of values; or a value that is the arithmetic mean of the two middle values if there is no one middle number.

Multi-Asset A combination of asset classes (such as cash, equity and/or bonds) used as an investment. A multi-asset class investment contains more than one asset class, thus creating a group or portfolio of assets.

Multi-Manager A multi-manager arrangement is one in which there are a number of different sub-managers each responsible for a particular element within the fund. A portfolio's assets are divided into sub-portfolios, which are managed separately by the individual sub-managers.

Net Asset Value (NAV) The fund's per-share value as calculated by the sum of underlying investment assets, after deducting all liabilities and accrued unpaid charges, divided by the number of shares outstanding.

Open-ended investment companies (OEICs) / Investment Company with Variable Capital (ICVC)

An Open Ended Investment Company (OEIC) or Investment Company with Variable Capital (ICVC) is a professionally managed collective investment scheme that pools your money with that of other customers. OEICs and ICVCs issue shares, each time someone invests and the size of the fund will grow or shrink to mirror the buying and selling of shares.

Ongoing Charges Figure (OCF) The OCF is made up of the Annual Management Charge (AMC) and other operating costs. Other operating costs include the costs for other services paid for by the fund, such as the fees paid to the trustee (or depositary), custodian, auditor and regulator.

Open Architecture See Unfettered funds.

Peer Group / Peers A selection of funds from competitors that have similar attributes to an SPW fund, allowing for competitor analysis.

Primary Share Class As defined by SPW (ACD), this is the share class that is used for new business, most widely available or holds the most assets.

Quartile Four equal groups into which a population of subjects, (e.g. a fund) can be divided according to a particular variable (e.g. performance).

Rebate When a fund manager wants to offer a customer a more favourable fee than those for any existing share classes of a fund, they may offer a rebate to the customer. This sees the customer pay the full OCF of a share class, but receive a partial refund, the 'rebate', from the fund manager thereby creating an artificially lower OCF.

Redemption A fund redemption is the term for when a customer sells their shares in a fund. The fund manager typically meets the redemption by providing cash from the sale of the corresponding underlying assets.

Relative Return The return an asset achieves over a specified period, when compared to a benchmark. When focused on active portfolio management this can be referred to as Alpha.

Representative Cost ex Transaction Fee An indication of the known recurring costs for the share class as levied by the management group, excluding transaction costs incurred by the fund in trading its holdings. This measure does not include one-off costs, or costs levied by third parties such as investment advisors or platforms. This data is annualised and indicates the fees that would be payable over a year.

Retail Non-SPW Advised Customers in this share class have the right to hold shares without having an advice relationship with SPW (Advice Company). These customers will be direct customers of SPW (ACD) and will not bear the same distribution costs associated with accessing the fund via other methods such as the platform fee. As SPW (ACD) does not actively provide funds for distribution outside of SPW (Advice Company) all retail customers should be customers who have had a previous commercial relationship with SPW (Advice Company) or an associated party who originally distributed the fund. Types of customers in this class include Individuals, 3rd-Party Nominees, Charities, Corporates, Life Companies and Trusts.

Risk-Adjusted Returns A calculation of the profit or potential profit from an investment that takes into account the degree of risk that must be accepted in order to achieve it.

Scheme of Arrangement In relation to a fund, a Scheme of Arrangement is a tax efficient method of moving customers into a different fund without forcing a costly redemption and re-investment. The customer will receive units in the target fund and their units in the existing fund will be cancelled.

Share Classes A fund can have different classes of shares. These classes will vary depending on how they are distributed, the type of end customer they serve and whether they accumulate or distribute any income derived from the underlying holdings. Share classes will typically have different annual management charges and ongoing charges figures, so this can result in different returns between classes.

SPW Advised (Share Class) Customers in this share class have the right to hold shares as part of a product sold by SPW (Advice Company) or an associated party of SPW (Holdings Company). This share class should be reserved exclusively for the use of customers accessing shares via an advised arrangement with SPW (Advice Company). The Annual Management Charge is set at a suitable discount to the retail class & LBG Advised class to ensure the shares are commercially competitive and with consideration of other costs customers may bear in accessing this class in particular platform costs not incurred by retail and LBG Advised customers.

SPW (Advice Company) Scottish Widows Schroder Personal Wealth Limited, referred to as SPW (Advice Company) in this report, is a wealth advice company that invests primarily in SPW (ACD) funds.

SPW (Holdings Company) Scottish Widows Schroder Wealth Holdings Limited, referred to as SPW (Holdings Company) in this report, is the holdings company that owns SPW (ACD) and SPW (Advice Company).

Strategic Asset Allocation (SAA) The longer-term average asset allocation of an investment portfolio across different kinds of assets such as absolute return strategies, bonds, property, equities, and commodities that is designed to meet the aims and objectives of a customer.

Sub-manager Fee Fees paid to any third party (other than the investment manager) that has been selected by the investment manager to manage all or a portion of the assets of the fund.

Synthetic Fee Fees paid to underlying funds in a fund of funds structure (being a structure whereby the fund primarily invests into other investment funds).

Tactical Asset Allocation (TAA) The short-term actual asset allocation of an investment portfolio across different kinds of assets, which varies from the long-term strategic asset allocation to take advantage of investment opportunities in the marketplace. TAA amendments can be made to an investment portfolio at any time.

Transaction Costs The costs associated with buying and selling assets in the funds. Transaction costs are important because they are one of the key determinants of net returns.

Transfer Agent A financial intermediary responsible for facilitating the transfer of ownership and record-keeping related to the shares or units of an investment fund. Transfer agents play a vital role in ensuring the smooth functioning of the funds administrative processes.

Unfettered funds A term usually used in relation to a fund of funds. It means the fund of funds can invest in both internal and external or third party funds. The opposite is a fettered fund of funds.

Value (strategy) An investment strategy that selects shares that are attractively priced, relative to the earnings or the internal value of the company – or, in some cases, relative to the market. The theory is that the share price of these companies will eventually rise to reflect the true value. Many consider value investing safer than growth investing, since prices of value stocks tend to be less volatile.

Volatility The speed and magnitude of price change over time, measured by standard deviation or variance.

Wrapper / Wrapped fund A wrapper fund consolidates an customers investment portfolio, typically through investing in a combination of collective investment schemes held in specified proportions to achieve a specific investment goal.

Yield The annual rate of return on an investment, as paid in dividends or interest. It is expressed as a percentage, generally obtained by dividing the annual dividend or interest payment into the current market price for a stock or bond.

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