



Carvetian Capital Management Limited

Assessment of Value Report – covering the following fund:

- Keel Balanced Fund

September 2021

Publication date: 31 January 2022

1. About Carvetian

Carvetian Capital Management Limited (“Carvetian”) acts as the Authorised Fund Manager (“AFM”) / Authorised Corporate Director (“ACD”) for a number of regulated collective investment schemes (“funds”). In the remainder of this document, ACD and AFM are used interchangeably.

The AFM of a fund is ultimately responsible for the fund’s establishment and ongoing operation. This includes, for example, appointing the Depositary if the fund is an Open Ended Investment Company (“OEIC”), appointing the Trustee if the fund is a Unit Trust (“UT”) and managing the assets of the fund. It also includes other key functions such as preparing and keeping up-to-date fund documents, such as the Prospectus, and undertaking administrative duties such as calculating the fund’s price. The AFM is responsible for overseeing any external parties, which it has appointed to undertake work on its behalf and for ensuring that the fund complies with all relevant rules and regulations.

2. About the Assessment of Value

All AFMs are required to carry out an annual review for each of their funds in order to assess the value which investors in those funds are receiving from their investments, this is known as the “Assessment of Value”.

The Assessment of Value does not focus solely upon costs, but instead requires firms to consider and assess at least the following matters:

- **Costs** – the fees paid to each party for the services provided to a fund;
- **Economies of Scale** – whether the benefit of any economies of scale which service providers may experience are passed on to the fund;
- **Comparable Market Rates** – how costs compare to those of other funds where available in the market;
- **Performance** – how a fund has performed with regard to its stated investment objective;
- **Quality of Service** – the range and quality of services provided to a fund;
- **Comparable Services** – how the types and quality of service being provided to a fund compare with other funds which operate on a similar basis; and
- **Classes of Units** – whether the classes of units or shares for a fund have different charges but offer substantially similar rights.

Where AFMs identify any instances where value is not being delivered to investors, they are required to take appropriate action and sufficient steps to address the matters which have resulted in poor value.

Following the completion of the Assessment of Value, AFMs are required to publish a statement (“Assessment of Value Report”) which sets out details of the review undertaken, the conclusions which it has drawn and a clear explanation of the action it has taken or will be taking to address any instances of poor value.

The AFM may publish its Assessment of Value Report for a fund within the fund’s annual Report and Accounts, or may publish a separate report which includes the relevant details; the Carvetian reports are made available separately to the Report and Accounts, via the Carvetian webpage.

3. Carvetian's Approach to the Assessment of Value

Carvetian undertakes an overall Assessment of Value each year covering all its funds and publishes a separate Assessment of Value Report for each fund. The separate reports provide details of the outcomes of the Assessment of Value applying to the respective fund.

The effective date for each year's Assessment of Value is 30th September and our Assessment of Value Reports are published on our website by 31st January in the following calendar year.

The following sub-sections of this report provide a summary of the review undertaken in relation to the criteria detailed previously in Section 2 of the report.

3.1 Costs

When assessing the costs incurred by each fund, we:

- collate actual cost information for all payments made by each fund as at 30th September in the year of the effective date of the report;
- collect fee information from the contractual agreements, which each service provider has been appointed under and scheme documentation;
- analyse both the contractual fee and actual costs incurred, in both monetary and percentage terms, to establish any funds and/or service providers where costs appear to be excessive or outliers; and
- consider whether significant costs warrant remedial action based on factors such as the breadth and quality of services provided, performance, economies of scale and comparable rates.

3.2 Economies of Scale

When assessing any benefit of economies of scale, we:

- collate actual cost information for all payments made by each fund as at 30th September in the year of the effective date of the report;
- collect fee information from the contractual agreements which each service provider has been appointed under and scheme documentation;
- obtain information on the changes in value of funds over prior years;
- analyse the contractual fee and actual costs incurred, in both monetary and percentage terms, with consideration to the nature of the fund and service being provided to establish whether economies of scale are, if experienced by the service provider, being passed onto the funds; and
- consider whether failure to provide economies of scale warrants remedial action based on factors such as actual or potential changes to the size of the fund, the materiality of the total fee and/or benefit of economies of scale and comparable rates.

3.3 Comparable Market Rates

When assessing comparable market rates, we:

- collate actual cost information for all payments made by each fund as at 30th September in the year of the effective date of the report;
- collect fee information from the contractual agreements which each service provider has been appointed under and scheme documentation;
- obtain information from publicly available sources for the cost of services provided to other similar funds. Where we have more than one entity providing the Carvetian fund with the same type of service, some reliance will also be placed upon internal sources of data;
- obtain information from publicly available sources on the overall cost of other similar funds;
- analyse the external data which has been collated against the cost information for the Carvetian funds to establish how comparable these are and identify any outliers; and
- consider whether outliers warrant remedial action based on factors such as the materiality of the differences and the relative breadth and quality of services provided, where these can be reasonably assessed.

3.4 Performance

When assessing performance, we:

- collate internal information on the past performance for each fund, or on the performance of each fund's various investment portfolios where there is more than one investment manager, over multiple time periods, including the fund's minimum recommended holding period;
- collect external data on relevant market indices and/or peer group performance;
- obtain other appropriate data, for example distribution rates where relevant, to allow assessment of performance against any fund specific objectives such as income targets;
- analyse each fund's performance over various time periods, including against its investment objective, other comparable funds and relevant market indices and/or peer group performance;
- analyse the achievement of any specific objectives of any fund against appropriate data where relevant; and
- consider whether any under-performance warrants remedial action based on factors such as materiality and consistency, the quality of other services provided and cost information.

3.5 Quality of Service

When assessing service quality, we:

- collate data and information on the quality of services provided, including for example the frequency and volume of services provided, accuracy of service provision, data on regulatory breaches and complaints, outputs from service review meetings and information on additional services provided without charge;
- obtain feedback from persons who experience the relevant services, to assess the perceived service quality;
- assess the breadth and quality of services provided against any contracts and service level agreements which are in place; and

- consider whether any sub-standard services being provided require remedial action to be taken based on factors such as any steps taken to date to address service deficiencies, the materiality and frequency of service issues and cost information.

3.6 Comparable Services

When comparing services, we:

- divide funds into separate groups which have similar characteristics based on factors such as size, operational differences and the target investors;
- compare funds within each group against one another to ensure the services which are being provided are comparable; and
- consider whether any non-comparable services require remedial action to be taken based on factors such as cost, the materiality of differences and the characteristics of the fund.

3.7 Classes of Units

When assessing classes of units or shares, we:

- collate information on the share classes which are available for each fund and the differences which exist between these; and
- consider whether the differences which exist require remedial action to be taken based on factors such as cost, economies of scale and the nature of the differences.

3.8 Exclusions

Although we are required to consider all services provided to funds as part of the Assessment of Value, there are certain costs which have been excluded due to their inherent nature. These are:

- FCA fees – these are fees which each fund pays to the Financial Conduct Authority (“FCA”) on an ongoing basis. These fees are fixed by the FCA and there is no alternative service provider;
- LEI (Legal Entity Identifiers) fees – these fees are required to be paid in order for the funds to be able to trade. There are only a limited number of LEI providers available to UK entities, all of which charge largely similar fees. Given many of the other providers are non-UK based and fees are therefore non-GBP and subject to currency fluctuations, the inconsequential nature of pricing differences does not currently warrant further action or consideration of switching suppliers.

3.9 Steps to Address Deficiencies

Carvetian’s board of directors (the “Board”), amongst other duties, is responsible for reviewing the manner in which the Assessment of Value has been conducted, ensuring all relevant elements have been incorporated and reaching a decision on whether any instances of poor value have occurred. Where the Board concludes that poor value exists, it will decide:

- how the matter should be addressed;
- when the matter should be addressed by; and
- who within Carvetian will be responsible for ensuring the relevant action is taken.

The Board is responsible for ensuring that any matters which have been identified have been addressed to a sufficient standard to ensure that the investors' best interests are protected and that all funds deliver value for investors.

4. About this Assessment of Value Report

This Assessment of Value Report sets out the review that has been undertaken and the conclusions reached in relation to:

- Keel Balanced Fund (hereafter referred to as the "fund")

5. About the fund

Investment Objective and Policy

The investment objective of the fund is to maximise the total return to shareholders, by preserving and growing the real value of investors' capital and income, placing an equal emphasis on the generation of income and on capital growth, over a period of 5 years). Real value is defined as a rate in excess of the United Kingdom Consumer Price Index All Items ("CPI") (net of fees).

To achieve the investment objective, the fund's investment policy is to invest at least 50% of the assets either directly or indirectly in global equities. The remaining portion of the fund's assets will be invested in corporate or government debt securities (directly or indirectly), units and/or shares in collective investment schemes ("CIS") (regulated or unregulated), immovable property (commercial property), gold (direct/indirectly), warrants, money market instruments, cash, near cash and deposits.

The fund may invest in CIS which are managed by the ACD, a Portfolio Manager or their associates. Investment in collective investment schemes will generally be directed toward funds which invest primarily in equities and debt securities, however the Company may invest in collective investment schemes which have different investment strategies or restrictions to the Company, including the ability to invest in derivatives for investment purposes or gain exposure to assets which are not expressly included in this policy, for example commodities.

Indirect investment in securities will be achieved by investing in either regulated or unregulated collective investment schemes (CIS), which includes exchange traded funds and investment trusts, or structured products (products which usually offer a fixed-term pre-defined return linked to the performance of a range of assets or indices) or a combination of each.

The fund is actively managed and there is no limit to which the fund can be invested in each sector or asset type, nor is there any particular geographic focus.

It is the fund's policy to maintain the flexibility to use derivatives and forward currency transactions for the purposes of Efficient Portfolio Management ("EPM"), including hedging, as defined by the Regulations. Whilst the Company may use derivatives and forward currency contracts for purposes of EPM, it is not currently the intention of the fund to use derivatives or forward currency transactions for purposes of EPM. From time to time the liquidity of the fund may be increased substantially if judged to be in the interests of investors.

Comparator Benchmark

The fund aims to achieve returns in excess of the United Kingdom Consumer Price Index All Items (“CPI”) (net of fees) over a period of 5 years. CPI is published by the Office for National Statistics and further information can be obtained from

<https://www.ons.gov.uk/economy/inflationandpriceindices/datasets/consumerpriceindices>.

Key Suppliers

The following are the key parties, who are appointed to provide services to the fund:

- **AFM** – Carvetian Capital Management Limited
- **Administrator** – Yealand Administration Limited
- **Investment Manager** – McInroy & Wood Limited
- **Depository** – NatWest Trustee & Depository Services Limited
- **Custodian** – RBC Investor Services Trust
- **Auditors** – Shipleys LLP
- **Property Advisor** – BNP Paribas Real Estate Advisory & Property Management UK Limited
- **Property Manager** – Tideway Investment Management Limited
- **Standing Independent Valuer** – Jones Lang LaSalle

6. 2021 Assessment of Value Outcomes

6.1 Review Summary

We have undertaken our Assessment of Value review for the effective date of 30th September 2021 in line with the processes summarised in Section 3, above. This subsequent report has been reviewed and approved by the Board.

Based upon the analysis which we have undertaken, the conclusions reached and any actions which we have taken or will be taking from the Assessment of Value, we assign a scoring system to each of the Assessment of Value criteria and to our overall assessment, representing whether or not value has been delivered to investors.

This scoring system uses the following ratings:

- **GREEN** – Where we feel good value has been provided to customers.
- **AMBER** – Where we feel value has been provided to customers but some form of action is required in order to ensure future value is enhanced or good value continues to be delivered.
- **RED** – Where value has not been provided to customers.

Based on our assessment, the fund has the following ratings:

Criteria	Keel Balanced Fund
Costs	
Economies of Scale	
Comparable Market Rates	
Performance	
Quality of Service	
Comparable Services	
Classes of Units	
Overall Assessment of Value	

Assessment of Value Conclusion

As outlined further in the sub-sections below and as demonstrated in the ratings above, the Board is comfortable that overall investors in the fund have received value from their investment taking into account all relevant factors and that the charges are justified in the context of overall services delivered. In addition, we have concluded that the fund offers value to investors which is comparable to that offered by products elsewhere in the market.

The following sub-sections of this report provide a summary of the conclusions reached for each aspect of the review and the details of any actions, which have been raised to address matters that have been identified as having impacted upon, or having the potential to impact upon, the value investors receive from their investments.

6.2 Costs

Following a review of the individual and overall costs paid by the fund, the Board has concluded that these are reasonable and justified in the context of overall services delivered.

The overall costs for the fund, known as the Ongoing Charge Figure (“OCF”), for the period under review were 0.94%. The OCF is the charge an Investor will pay over a year for as long as they hold their investment; it relates to the costs of running the fund. We deduct the OCF from the fund and the published fund prices reflect this deduction.

Should investors wish to obtain further information on specific costs of individual service providers, the most up-to-date information is available within the latest Key Investor Information Document which is available on our website, or the Prospectus and Report & Accounts, which are available on request.

6.3 Economies of Scale

Following a review of the individual and overall costs paid by the fund and with consideration given to the relevant size of the fund and the operating costs of the relevant parties, the Board has concluded that any economies of scale are being passed onto the fund's investors.

6.4 Comparable Market Rates

Following a review of the individual and overall costs paid by the fund and with consideration given to the rates charged on other comparable funds, the Board has concluded that the fund's fees are comparable with those of other funds available in the market.

As full detailed disclosure of all fees is not currently required in the UK, it is not always possible to fully and accurately compare the fees of the fund with those of others in the market. For example, many funds will disclose an Annual Management Charge which is a single charge used to pay the fees of several parties providing services to the fund rather than disclose the individual fees of all the parties. As a result, the amount of data available to compare our funds against is in some parts restricted and certain assumptions therefore have to be made. While this has limited our analysis, we do not believe it has had a fundamental impact upon the conclusions reached.

6.5 Performance

Following a review of the performance of the fund, including consideration of the fund's investment objective, the Board has concluded that the fund is meeting its investment objective, to maximise the total return to shareholders, by preserving and growing the real value of investors' capital and income, placing an equal emphasis on the generation of income and on capital growth, over a period of 5 years. The Board is also satisfied that the fund has been managed during the reporting period in line with the established investment policy and objective.

The performance of the fund and the Comparator Benchmarks for the period under review is detailed below:

	Sep20-Sep21 (1 Year)	Sep19 -Sep20 (1 Year)	Sep18-Sep19 (1 Year)	Sep17-Sep18 (1 Year)	Sep16-Sep17 (1 Year)	Sep16-Sep21 (5 Year)
Keel Balanced Fund	10.25%	-*	-*	-*	-*	-*
CPI	3.02%	1.08%	1.83%	2.44%	2.17%	11.18%

*Source: Yealand Administration and FE Analytics. Bid to Bid in Sterling with net income reinvested. Returns are shown net of annual management charge, other expenses and net income reinvested. Returns do not include the effect of initial charges. **Past performance data is no guide to future performance, the value of shares and the income from them may fall as well as rise and is not guaranteed.***

*Due to the fund's launch date, we were not able to assess performance across all time periods up to and including a five year holding period of the fund. While this has limited our analysis, we do not believe it had a fundamental impact upon the conclusions reached.

Should you wish to obtain further information on the fund's performance, the most up-to-date information is available within the latest Key Investor Information Document which is available on our website, or the Prospectus and Report & Accounts, which are available on request.

6.6 Quality of Service

Following a review of the service quality for all relevant service providers, the Board has concluded that a suitable quality of service has been provided to the fund.

6.7 Comparable Services

Following a review of the range and quality of services provided to the fund and with consideration to the relevant characteristics of respective groups of funds, the Board has concluded that services provided to the fund are comparable and that it has been treated fairly.

6.8 Classes of Units

The fund is only available to investors via a single share class, therefore this aspect of the assessment is not relevant.

7. Further Information

Should you wish to obtain further information on the fund, the most up-to-date information is available within the latest Key Investor Information Document which is available on our website, or the Prospectus and Report & Accounts, which are available on request.

A Glossary of Definitions which provides definitions to some of the technical language used in this document is available from www.carvetian.com/policies.

If you have any questions regarding the content of this Assessment of Value Report, please contact us on 0345 850 0255.