Yealand Fund Services Limited

Fund year-end Assessment of Value Report –
covering the following fund:

HavenRock Fund

31st December 2024

Publication date: 30th May 2025

1. About Yealand

Yealand Fund Services Limited ("Yealand") 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 information is 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 (the "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 Yealand reports are made available separately to the Report and Accounts, via the Yealand website.

We previously assessed the value provided by all Yealand funds once per annum, in September, with reports published by January the following year. The last reports published in this manner were in January 2024. We now conduct the Assessment of Value for all Yealand funds every 6 months, which is linked to the interim and year-end accounting dates of each fund.

3. Yealand's Approach to the Assessment of Value

Yealand undertakes an overall Assessment of Value for each Yealand fund every 6 months, linked to the respective interim and year-end accounting date per fund and publishes a separate Assessment of Value Report for each fund. The separate reports provide details of the outcomes of the Assessments of Value applying to the respective fund.

Previously, we assessed the value of this fund on 30th September (or the prior business day if the 30th September did not fall on a business day) annually, and our Assessment of Value reports were 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:

- Utilise the Ongoing Charges Figure (OCF) taken from the respective accounting records;
- 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:

- Utilise the Ongoing Charges Figure (OCF) taken from the respective accounting records;
- 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 pass on the benefit of 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:

- Utilise the Ongoing Charges Figure (OCF) taken from the respective accounting records;
- 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 there is more than one entity providing the 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 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, over multiple time periods, including the fund's minimum recommended holding period, up to and including the most recent full calendar quarter;
- 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:

- compare funds against one another to ensure the services which are being provided are comparable, based on factors such as fund size, operational differences and the target investors; and
- consider whether any non-comparable services based on price and range of services require remedial action to be taken, considering 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

Yealand'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 Yealand 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:

- HavenRock Fund (hereafter referred to as the "fund")

5. About the fund

The following section headed "Investment Objective and Policy" is an extract from the fund's Prospectus, which is available on request. For definitions of terminology used within the following extract, please refer either to the Prospectus or to the Glossary of Definitions which provides definitions to some of the technical language used throughout this document and which is available from www.yealand.com/funds/.

Investment Objective and Policy

The investment objective of the Fund is to seek to achieve long term (at least 5 years) capital growth and income.

The investment policy for achieving the objective of the Fund is to invest primarily (at least 70%) in global securities, bonds (both corporate and government debt securities) and collective investment schemes ("CIS"), though money market instruments, cash and near cash, deposits and derivatives and forward transactions (for efficient portfolio management purposes) may also be used if deemed appropriate to enable the pursuit of the investment objective.

The Fund is actively managed and has, with the exception of the above noted minimum, no limit to which it can be invested in each sector or asset type, nor is there any particular geographic focus. The Portfolio Manager has full flexibility to adjust the proportion of the property of the Fund depending on their view of market conditions and the assets which it believes are most likely to achieve the Fund's investment objective. From time to time the liquidity of the Fund may be increased substantially if judged to be in the interests of investors.

The Fund may invest in CIS which have different investment strategies or restrictions than the Fund, including the ability to invest in derivatives for investment purposes and to gain exposure to assets which are not expressly listed above. Investment in CIS will usually be limited to those which invest primarily in the assets listed above and without exception, CIS will only be held in so far as the rules permit the Fund to gain exposure to the assets held by those CIS.

Benchmark

The fund's "comparator benchmark" is the Investment Association's Flexible Investment Sector ("IA Flexible") (hereafter referred to as the "benchmark"). Further information on the benchmark can be obtained from www.theia.org/industry-data/fund-sectors/definitions

Key Suppliers

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

- **AFM** and **Administrator** – Yealand Fund Services Limited
- **Investment Manager(s)** – Bordier & Cie (UK) Plc, and Goldman Sachs International
- **Depositary** – NatWest Trustee & Depositary Services Limited
- **Custodian** – CACEIS Bank, UK Branch (formerly CACEIS Investor Services) – ("CACEIS")
- **Auditors** – Moore Kingston Smith LLP (formerly Shipleys LLP)

6. Annual Assessment of Value Outcomes

6.1 Review Summary

We have undertaken our Assessment of Value review as at the accounting period end-date in line with the processes summarised in Section 3, above. This report has been reviewed and approved by the Board of Yealand.

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 have assigned a scoring system to each of the Assessment of Value criteria and to our overall assessment indicating whether or not value has been delivered to investors.

This scoring system uses the following ratings:

- **GREEN** – Where we consider good value has been provided to customers.
- **AMBER** – Where we consider 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 we consider value has not been provided to customers.

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

Criteria	Outcome of Assessment
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, whilst value has been provided in the majority of areas assessed, the Board has concluded that value has not been provided in the context of investment performance and therefore value has not been provided overall. As detailed in section 6.5, the fund has underperformed against the comparator benchmark by more than 10% over the investment horizon.

In addition, as detailed in section 6.2, the OCF of the fund is higher than the average of other funds in the same IA sector, which means investors have faced higher than average charges and less-than-average investment performance.

Yealand will continue to closely monitor the investment performance and engage with the Investment Manager(s) as well as implementing a performance monitoring action plan, focussing first on the short-term performance and then extending to the medium-term.

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, however action is required.

The overall costs for the fund, known as the Ongoing Charge Figure ("OCF"), for the period under review were 1.31%. 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.

The OCF noted is higher than the average OCF of funds in the same IA sector, with the investment performance (see section 6.5) being below the IA sector average. Based on the costs and investment performance, we will engage with the Sponsors and main investors to ensure they are aware that the standalone fund structure is resulting in costs which are higher than equivalent widely distributed funds, with less investment performance returns. We will seek explicit confirmation that the fund remains the most suitable investment vehicle for the underlying investors.

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 whilst the fund is meeting its investment objective, it is materially underperforming its comparator benchmark by more than 10% over the 5-year investment horizon and value has therefore not been provided.

Yealand will continue to closely monitor the investment performance and engage with the Investment Manager(s) as well as implementing a performance monitoring action plan, focussing first on the short-term performance and then extending to the medium-term.

The performance of the fund and the comparator benchmark for the period under review is detailed below:

Cumulative performance to 31/03/25 (%)

Period	3 month	6 month	1 year	3 year	5 year	7 year	10 year
the fund	-2.75	-1.65	0.31	4.46	36.84	33.92	47.18
IA Flexible	-1.73	0.14	2.92	8.73	47.32	39.81	63.08

Discrete calendar year performance (%)

Period	2024	2023	2022	2021	2020	2019	2018	2017	2016	2015
the fund	8.40	9.52	-13.11	11.54	5.74	15.73	-6.06	7.78	8.50	1.20
IA Flexible	9.42	7.08	-8.98	11.30	6.70	15.66	-6.72	11.21	13.82	1.99

Source: Yealand and FE Analytics. Mid to Mid 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.***

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.yealand.com/funds/.

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