

## MIFID II PRODUCT GOVERNANCE

Marlborough Adventurous

### Product

The product is an open-ended Irish collective asset management vehicle which is constituted as an umbrella fund with segregated liability between Funds and with variable capital. The Fund is actively managed.

The investment objective of the Fund is to generate capital growth over the longer term (5 years +) by gaining exposure to a medium to high risk adventurous mix of asset classes.

The Fund will be actively managed and will seek to invest at least 80% in a variety of collective investment schemes, exchange traded Funds and investment trusts.

Through the investment in Collective Investment Vehicles, the Fund will seek to maintain an equity exposure up to 100% and limit its exposure to commodities and property to below 25% which is reflective of its adventurous approach. The Fund will further seek to limit its exposure to property linked Collective Investment Vehicles to 2.5% per holding. The Fund may invest more than 20% of its Net Asset Value in emerging and frontier markets.

### Target Market

#### **The type of client to whom the product is targeted**

As a non-complex fund it is targeted at retail investors, professional investors and eligible counterparties.

#### **Clients' knowledge and experience**

The Fund has no complex features or guarantees so investment experience is not a necessity. However, a basic understanding of understanding of investment markets, the kind of underlying investments of the Fund and the risks involved in investment is important.

Investors should read the Key Investor Information document which is intended to help investors understand the nature and risk of investing in this fund.

Investors are also advised to read the fund's prospectus which contains details on the objectives, investment strategies, risk, distribution policy, fees, expenses and Fund Management.

#### **Clients' financial situation, with a focus on the ability to bear losses**

Clients should be prepared to commit to their investment for the long term or risk losing part of their investment in the medium to short term. The minimum investment horizon should be greater than five years.

Investors will have no risk of loss greater than their invested amount. As a fund with exposure to financial instruments investors should be aware that the potential exists for a

total loss of assets and should therefore be able to bear such losses. However, the fund will be managed in such a way to reduce this risk considerably.

## Clients' risk tolerance and compatibility of the risk/reward profile of the product with the target market



This Fund has been measured as 5 because its investments have experienced moderate to high volatility in the past. The Fund's volatility is affected by various risks.

The fund is therefore compatible with clients who have a higher than medium risk tolerance.

Perceptions of risk will vary from person to person. The risk tolerance identified here refers to a fund which invests in such a way as to maintain moderate to high volatility. It will not take significant positions in individual financial instruments or invest in highly speculative assets.

## Clients' objectives and needs

The client's objectives should be in line with the fund's investment objective, which is to generate capital growth over the longer term (5 years +) by gaining exposure to an adventurous mix of assets.

## Clients who should not invest (the 'negative-target market')

The Fund may not be suitable for certain investors, including but not limited to those whose objectives and needs are not consistent with the nature of the Fund, those who are unable to commit capital for a sufficient term or do not have sufficient resources to bear any loss which may result from an investment in the Fund. The Fund is also not committed to meeting any specific ethical, social, religious or environmental restrictions which some investors may be seeking.

## Distribution channel

The Fund will be distributed primarily via fund platforms, wealth managers, discretionary fund managers and financial institutions.