

IFSL

— Fund Services —

31 January 2023

The Value Assessment Report
IFSL AMR OEIC

*Industry knowledge,
service quality
and fund expertise*

Value assessment report

This report describes the assessment of value we have carried out for the following fund (the Fund):

IFSL AMR
Diversified
Portfolio



1. The Value Assessment Report



Dear Investors,

This report is the result of the annual assessment of value that we have carried out for you.

Investment Fund Services Ltd is the authorised fund management company (AFM) for the Fund covered by this report. As the AFM, we are responsible for operating the Fund in the interests of our investors. Producing this report is an important way in which we discharge that responsibility. We are also accountable to our regulator, the Financial Conduct Authority (FCA).

We carry out a value assessment at least yearly for each of our funds. The team who carry out the value assessments includes two independent non-executive directors. A part of this independent challenge is to ensure particular regard is given to investor outcomes. As Chair of our Board of directors, I have responsibility to ensure we carry out these value assessments.

The purpose of the assessment of value is to consider whether the payments that the prospectus allows to be taken from the Fund are justified in the context of the overall value delivered to investors. After each assessment, we publish this report to provide you with our conclusions and explanations about its key aspects.

When carrying out the value assessment, we have been guided by three key considerations. These are:

- The rules of the FCA.
- Making the report meaningful for investors.
- The importance of measuring value and not just cost.

Each are now explained in more detail.

I. The rules of the FCA

These require us to consider certain minimum criteria. There are seven set by the FCA.

FCA Assessment of Value Criteria	Summary of FCA Assessment of Value Criteria
Performance	Is the Fund performing against its investment objectives?
Comparable Market Rates	Is the Fund priced similarly to competitors?
Comparable Services	Is the Fund priced reasonably compared to other products with similar investment strategies?
AFM Costs	Are fees charged to investors reasonable and appropriate?
Economies of Scale	Are economies of scale generated and passed on to investors?
Quality of Service	Does the range and quality of service offer value?
Classes of Units	Are investors in the cheapest available unit class based on their characteristics?

Each is considered under its own heading below.

We are not limited to the seven that are prescribed but to date we have found they are sufficiently broad to allow us to carry out the value assessment. We keep this under review.

II. Making the report meaningful for investors

We aim to provide an assessment that is meaningful for all investors. We recognise individuals will have their own reasons for holding the Fund and their own specific goals. We have been guided by the following considerations for the Fund:

- The specific investment objectives as set out in the prospectus.
- The investment policies and strategies.
- Any relevant benchmarks, including any against which performance is measured.
- The fund's target market (the types of investors who could be expected to consider buying it).

We have considered these factors as at 30 September 2022, not merely across a single year but particularly in relation to performance - across timescales which better reflect the periods over which investors could be expected to hold the Fund.

III. The difference between assessing value and simply measuring cost

We believe that the best value for investors does not necessarily simply mean the lowest costs.

As an example, the Fund in this report is actively managed. This means the investment manager chooses which investments to make, based on their own research and processes. This approach can be expected to result in higher costs being taken from the Fund than for passive funds. Passive funds are where investments are chosen based on an index or because of the size of the company, for example, and not based on a decision by an investment manager. However, while we consider the higher costs as part of the assessment of value, we will also look at other factors, such as the actual returns achieved for investors, which are net of these costs.

Nevertheless, we are clear that any assessment of value includes an assessment of the controls over costs borne by the Fund.

In closing, I remind you that the value of your Fund can fall or rise in value and it can do so daily. The Fund is exposed to stock markets and market conditions can change rapidly resulting in volatile price movements and being affected unpredictably by diverse factors, including political and economic events. In addition, inflation will, over time, reduce the value of your investments in real terms. We carried out our assessment with performance figures as at 30 September 2022. You can always find up to date performance figures on our website or from your adviser or platform.

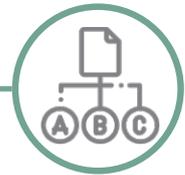
I hope in turn you find this report of value. All of us at IFSL welcome any feedback on how to improve these reports for the future.

With my kind regards,

Guy Sears

Independent non-executive Chair of the Board

2. The characteristics of the Fund



When we described our approach above, we said we considered the objectives and investment policies. In this section we summarise these characteristics for the Fund.

IFSL AMR Diversified Portfolio

Investment objective

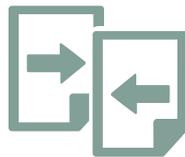
The Fund aims to provide income, that is, money paid out from your investment, such as interest from bonds or dividends from shares, with prospects for capital growth, which is profit on investments, over 5 to 7 years.

There can be three types of benchmark and these are explained below.

Types of benchmarks



A 'target' - A benchmark used to define the fund's target performance (or to trigger a payment from scheme property (such as a performance fee).



A 'comparator' - A benchmark which is used as a performance comparator for the fund ('performance benchmark').



A 'constraint' - A benchmark which constrains the composition of a portfolio.

The IFSL AMR Diversified Portfolio's benchmark

Comparator - IA Mixed Investment 40-85% Shares sector

Target - None set

Constraint - None set

The latest version of the information can always be read by looking at the Key Investor Information Document. These are available on our website at www.ifslfunds.com. They also set out the investment policy, which explains in more detail how each Fund aims to achieve its objective.

3. Range and quality of services



What have we considered?

In this section we have considered the first area of the value assessment. This covers the quality of service we provide and the quality of service provided by any person to which any aspect of the Fund's management has been delegated or who provides services to us.

How have we made our assessment?

We have reviewed and given consideration to the services delivered and how they affect investors in the Fund and the delivery of the Fund's objectives. We also give consideration to the quality of the service delivered by IFSL and each external provider.

We have considered, as we do for all value assessments, whether they have been managed within their investment restrictions and if there have been any operational errors or complaints. There are no material issues which we consider affect our conclusions about quality of service in this assessment period.

We have reported under three subsections:

Services in relation to required independent third parties - Depositary, Custodian and Auditor

Other third parties - The Investment Manager and the Sponsor

In-house functions - Our own provision of services to the Fund

In this part of our assessment, there are no material distinctions between any of the share classes within the Fund, unless we specify otherwise.

Services in relation to required independent third parties

The following section considers the required independent third-party service providers: the Depositary, the Custodian and the Auditor.

The Depositary

The Depositary is an independent entity charged with various regulatory responsibilities to the Fund. It is a key part of the oversight of the Fund.

The Depositary is paid from the Fund it oversees directly under the terms of the prospectus. Its fees are shown in the statutory accounts.

As AFM we are responsible for selecting the Depositary, negotiating its fees and other commercial terms and for monitoring its performance and suitability on an ongoing basis.

In order to ensure we receive a good level of service we only work with a very limited number of Depositaries at any one time. There are presently two across the entire range of funds for which we, and our associated companies, are the AFM. The Depositary for the Fund is HSBC Bank plc.

We have assessed the Depositary based on a mix of criteria including but not limited to:

- size and reputation within the industry
- geographical relevance for the Fund's strategies and investors
- service levels
- history of interactions
- resource and expertise
- costs and charges

Our interactions with them lead to constructive dialogue and challenge as we at IFSL work in collaboration with them to prioritise good outcomes for our fund investors.

The costs chargeable to the Fund by HSBC were last reviewed formally by us in the first quarter of 2022 and resulted in no changes being made following a prior reduction applied in 2019. We regularly check the fees paid to our service providers to ensure they deliver value when considered against the service we receive.

The Custodian

The Custodian is an independent entity responsible for holding the assets of the Fund. Again, this role is key in ensuring good outcomes for investors.

The Custodian is paid from the Fund directly under the terms of the prospectus. Its fees are shown in the statutory accounts. It is appointed by the Depositary but will be selected, and commercial terms will be negotiated and agreed, by us as the AFM.

Along with the Depositary, we review and monitor the performance of the Custodian and review the charges made to the Fund.

In order to ensure we receive a good level of service we only work with a very limited number of Custodians at any one time. There are presently three across the entire range of funds for which we, and our associated companies, are the AFM. The Custodian for the Fund is HSBC Bank plc.

We have assessed the Custodian based on a mix of criteria including but not limited to:

- size and reputation within the industry
- geographical relevance for the Fund's strategies and investors
- service levels
- history of interactions
- resource and expertise
- costs and charges

We at IFSL work in collaboration with them to prioritise good outcomes for our investors.

The costs chargeable to the Fund by HSBC were last reviewed formally by us in the first quarter of 2022 and resulted in no changes being made following a prior reduction applied in 2021. We regularly check the fees paid to our service providers to ensure they deliver value when considered against the service we receive.

The Auditor

The Auditor is an independent entity responsible for auditing the financial statements of the Fund.

The Auditor is paid from the Fund directly under the terms of the prospectus. Its fees are shown in the statutory accounts.

It is selected and appointed by us, as AFM, and we are responsible for negotiating the commercial terms, including the audit fees charged to the Fund.

We have assessed the auditors based on a mix of criteria including but not limited to:

- size and reputation within the industry
- expertise, scale and involvement with regulatory and industry change
- appropriateness to overall business scale
- appropriateness for the range of funds for which we are AFM

We regularly check the fees paid and compare these against other service providers to ensure they deliver value when considered against the service we receive and the fees achieved by other funds for which we are AFM. We have regular interaction with the Auditor and remain confident that the fee is appropriate based upon the service received, including having considered each of the factors above.

Other third parties - appointments and outsourcing

This section refers to the delegation of certain functions to, or the appointment of, an external entity. Such arrangements are not required by regulation but may be entered into at our discretion.

The Investment Manager and Sponsor

We have appointed AMR Financial Management Limited (AMR) to manage the investments within the Fund. AMR are also the Sponsor and are responsible for the promotion and distribution of the Fund.

AMR receives an annual management charge payable under the terms of the prospectus. We have assessed AMR based on a mix of criteria including but not limited to:

- resource and expertise
- investment research, which is funded by AMR themselves and is not an additional charge to the Fund
- its control of transaction costs (which the Fund pays) and how trades are executed
- whether they have been managed within their investment restrictions
- a review of any operational errors or complaints
- the timeliness with which complete and accurate data is provided to us
- how the Fund is distributed

Having regard to these factors and our oversight and governance more generally, we conclude that the charges taken for the services of the Investment Manager and Sponsor were justified based on the overall value delivered to investors.

The results of our review of AMR's service provided, with regard to the outcomes delivered versus the Fund's objectives and the manner in which they were delivered, are discussed in more detail under the 'Performance' section below.

In-house functions - the quality of our own services

Governance and oversight

We dedicate senior manager and board level resource to our governance structures, including Product Governance, Investment, Risk and other operational committees. Combined with our model of running most services in-house, we believe that this level of governance helps us to safeguard the best interests of investors.

As AFM, we are responsible for overseeing any party that provides services to our funds and agreeing commercial terms for those services. We continuously review our service providers to ensure they continue to meet the high standards we expect for our investors.

Administration

In the UK fund industry, it is not uncommon for an AFM to use third parties to carry out fund administration services. This may include dealing and settling purchases and sales of units in the funds, calculating the funds' dealing prices and maintaining the register of unit-holders in the funds.

We maintain our own systems and resources in order to carry these activities out ourselves. We do this so that we are able to retain specialist operational expertise and maintain transparency in our processes. This also means we can direct investment into our people and our technology in a cost effective manner, that we feel brings benefits to investors.

Investor communications and relations with investors

We have a dedicated investor support team and, with the exception of some printing and publication work, all communication with investors is conducted by in-house staff, who provide support and information to end investors and their intermediaries. Working alongside our fund administration staff, this team benefit from technical training and specialist knowledge, enabling them to provide an efficient and responsive service for our investors.

Additional competencies

In addition to our in-house expertise we maintain close relationships with recognised specialist law firms, accountants, trade bodies and training providers to maintain an up-to-date understanding of legal and regulatory expectations and best practice.

Conclusion

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

4. Performance



When assessing the value represented by the performance achieved by the Fund over the past twelve months we have considered an in depth package of information. This allows us to consider the performance having regard to the investment objective (and policy) of the Fund. A fund's objective may envisage that success is to be measured over a period greater than a year. For example, it may say that the fund aims to grow your investment over a 5 year period. We bear such timescales in mind in forming our assessments of performance.

Within the above context, for each fund, we consider the:

- comparative outcome relative to their benchmark
- volatility (a measure that considers how often, and by how much, the value of an investment goes up and down relative to its average or to a benchmark)
- performance relative to a range of industry standard risk adjusted measures of performance
- the investment management activities and strategies undertaken by the Investment Manager

The objective and policy for this Fund is set out in Section 2. Full information including the Fund's objectives and investment policies can be found in the Key Investor Information Document. These are available on our website at www.ifslfunds.com.

The following tables show the performance achieved compared to the comparator benchmark.

Income Yield	Sep-22	Sep-21	Sep-20	Sep-19	Sep-18
IFSL AMR Diversified Portfolio A Class Acc	3.1%	2.4%	3.0%	3.2%	3.1%
IA Mixed Investment 40-85% Shares	1.4%	1.1%	1.5%	1.7%	1.5%

Performance	1 Year	3 Years	5 Years
IFSL AMR Diversified Portfolio A Class Acc	-13.5%	-1.7%	5.4%
IA Mixed Investment 40-85% Shares	-10.2%	5.4%	15.8%

Cumulative returns at 30.09.2022

Further details of distribution payments made to investors can be found in the Fund's statutory accounts. These are available on our website at www.ifslfunds.com.

Conclusion

The aim of the Fund is to provide income with prospects for capital growth, over 5 to 7 years.

The Fund has achieved both aims as it has produced a consistent level of income over all time periods and has achieved capital growth over 5 years.

When compared to its peer group which is the IA Mixed Investment 40-85% sector, the Fund has provided greater levels of income and as a result sits in the top quartile of this sector. However, when comparing the performance returns, the Fund has underperformed the sector and has delivered this performance at a slightly higher level of risk.

The Fund's underperformance from a growth perspective is principally because of the Investment Managers portfolio construction and its resilience to recent market conditions. We will continue to closely monitor the Fund's performance to oversee targeted improvements are sought to be achieved and will engage with the Investment Manager where necessary.

In our opinion, overall payments from the Fund are justified in the context of the value delivered to investors during the period.

Important Information

Capital is at risk. Past performance is not necessarily a guide to future performance. The value of investments and the income from them is not guaranteed and can go down as well as up. Investors may not get back the full amount invested.

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

The Fund has exposure to bonds, the prices of which will be impacted by factors including; changes in interest rates, inflation expectations and perceived credit quality. When interest rates rise, bond values generally fall. This risk is generally greater for longer term bonds and for bonds with perceived lower credit quality.

The Fund invests in other currencies. Changes in exchange rates will therefore affect the value of your investment.

The Fund may invest a large part of its assets in other funds for which investment decisions are made independently of the Fund. If these investment managers perform poorly, the value of your investment is likely to be adversely affected. Investment in other funds may also lead to duplication of fees and commissions.

In certain market conditions some assets may be less predictable than usual. This may make it harder to sell at a desired price and/or in a timely manner.

To ensure that the objective of providing an income can be met, the annual Manager's charge is deducted from capital rather than income. Future capital growth may be constrained as a result.

5. AFM costs in general



What have we considered?

We have considered the following components of the ongoing charges figure (OCF). These are described below and investors can find a detailed breakdown of the actual amounts paid for each in the latest annual report and accounts.

The components are as follows:

Annual management charge

This is a percentage fee paid from the Fund to the Investment Manager and the Sponsor.

Administration Fee

This is a percentage fee paid from the Fund to IFSL as AFM.

Depositary fee

This is a percentage fee paid from the Fund to the Depositary.

Custody fee

This is a combination of a percentage fee and fixed, transaction-based fees paid from the Fund to the Custodian.

Audit fee

This is a fixed annual fee paid from the Fund to the Auditor.

Registrar Fee

This is a fixed annual fee per shareholder entry on the Fund's register, paid to the AFM for maintaining the register of shareholders.

KIID update fee

This is a fixed annual fee paid to cover the cost of reviewing and updating the key investor information document (KIID) for the Fund.

FCA fees

This is a fixed annual fee paid to the FCA for its role as regulator of IFSL and the Fund.

Ongoing charges figures

Fund	Share Class	Ongoing Charges Figure (OCF)
IFSL AMR Diversified Portfolio	A Class	1.51%

IFSL do not apply exit charges to the Fund.

IFSL do not apply performance fees to the Fund.

The ongoing charge figures above are based on actual expenses for the year ending 30 September 2022. They cover all aspects of operating the Fund during the year, including the fees paid and described at the start of this section 5. It does not include payments to your financial adviser and/or any other firm through which you invest. You pay for their services directly. The Fund invests in other collective investment schemes, or funds. We have not directly considered the costs of these underlying funds, but their selection and suitability are part of our assessment of the quality of service provided by the Investment Manager and of the performance of the Fund. The OCF figures above, and the performance of the Fund, all take account of the underlying costs of these investments (i.e. performance is reviewed net of all charges).

Conclusion

In the previous year's assessment, we noted an opportunity to reduce some of the individual costs to provide enhanced value going forward. On 1 July 2022 we reduced the AMC from 0.75% to 0.60% and wrote to investors to confirm this change. In our opinion, the costs of the individual services provided are justified and represent reasonable value for investors.

6. Comparable market rates



Periodically we review the fees we pay to third parties.

The comparable market rates for depositories, custodians and auditors are subject to a degree of commercial confidentiality. Nevertheless experience of past fees, the tender or review processes we use and our own awareness of the market means our approach secures the best value for money when these contracts are reviewed or re-tendered; and that we review and re-tender with a reasonable frequency given the nature of the relationships and different costs of moving suppliers.

Depositories commonly structure their fees on an ad-valorem basis, which means fees are based on the size of the fund. We keep these fees under review to ensure that they remain competitive and that they represent good value for investors.

We have considered the fees which are paid to the investment manager and sponsor against those of similar services provided to other funds for which we are AFM.

The market rates for independent AFMs are also subject to a degree of commercial confidentiality and will vary depending on the size and type of fund. Contracts are commercially negotiated and reflect the competitive nature of the independent AFM market. Fund sponsors typically conduct full tendering processes and can move funds to other independent AFMs. This ensures that IFSL remains competitive and offers value for investors.

In making our assessment of the overall costs, we have also compared the OCF for the Fund with other similar funds in the market.

Conclusion

The Fund's OCF is higher than the average for other similar funds. This is in part due to the indirect costs which the Fund incurs by holding investments which have their own charges, for example when it invests in other funds. In the previous assessment we believed there was an opportunity to reduce the OCF to benefit investors and deliver better value. As noted above in section 5, on 1 July 2022 we reduced the AMC from 0.75% to 0.60%. We are therefore satisfied that the fees are reasonable in regard to the factors outlined above.

7. Comparable services



With regard to AFM services, IFSL provides comparable services to other fund ranges.

While the charging structure will vary depending on the size, nature and risks involved with particular funds, the fees paid by this Fund are similar to those paid by other comparable funds within our range.

We also consider comparable services offered by the third party providers to the Fund, such as the Investment Manager. Where providers do offer comparable services we ask them to outline the key differences in charging and service, so that we can ensure good value is delivered to fund investors when compared against alternative products and services available elsewhere from the same provider.

Conclusion

We are satisfied that the costs are reasonable and appropriate having regard to the factors outlined above.

8. Economies of scale



What have we considered?

We have considered two different types of economies of scale relating to:

The size and scale of the funds

Larger funds are more profitable to us, in some cases we are charging a minimum fee to a fund until it grows in size.

Certain services have fixed or minimum fees. This means that as funds grow they benefit from their increase in scale. We seek to ensure that each fund offers value to investors and is commercially viable in its own right taking in to account the impact of any fixed or minimum fees.

The size and scale of IFSL as AFM

The second area of economies of scale is where we can negotiate terms for the large number of different funds for which we act as AFM. IFSL is AFM to over 70 funds with more than £10 billion under management. We use this scale to negotiate fees wherever we think it is in the interests of all the funds affected. We discuss with our suppliers the need to ensure that fees are fairly and transparently spread across all the funds.

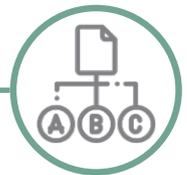
Depositary relationships are negotiated across multiple funds to achieve the best possible rates. IFSL negotiate Depositary fees on an appropriate sliding scale, with lower percentage fees applying as the Fund reaches certain thresholds, ensuring economies of scale apply directly to the benefit of the Fund and the investors.

Conclusion

We are satisfied that economies of scale are being passed onto investors where these are being achieved.

9. Share classes

The Fund has only one class of share and so there are no different share classes with different features to consider.



10. Our conclusion of the value assessment

Overall, we are satisfied that the charges taken from the Fund are justified in the context of the overall value delivered to investors.

