

31 May 2023

The Value Assessment Report  
IFSL RC Brown OEIC

*Industry knowledge,  
service quality  
and fund expertise*

## Value Assessment report

This report describes the value assessment we have carried out for the following funds (the Funds):

IFSL RC  
Brown UK  
Primary  
Opportunities  
Fund



IFSL Meon  
Adaptive  
Growth  
Fund



# 1. The Value Assessment Report



Dear Investors,

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

Investment Fund Services Ltd (IFSL) is the authorised fund management company (AFM) for the Funds covered by this report. As the AFM, we are responsible for operating the Funds 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. 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 value assessment is to consider whether the payments that the prospectus allows to be taken from the Funds 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.

## 1. The rules of the FCA

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

FCA Value Assessment Criteria	Summary of FCA Value Assessment Criteria
Performance	Are the funds performing against their investment objectives?
Comparable Market Rates	Are the funds priced similarly to competitors?
Comparable Services	Are funds 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 in the following pages.

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 Funds and their own specific goals. We have been guided by the following considerations:

- 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 31 January 2023, 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 Funds.

## III. The difference between assessing value and simply measuring cost

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

As an example, the Funds in this report are 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 Funds 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 value assessment, 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 value assessment includes an assessment of the controls over costs borne by the Funds.

In closing, I remind you that the value of your fund can fall or rise in value and it can do so daily. The Funds are 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 31 January 2023. You can also find up to date performance figures on our website or from your adviser or platform.

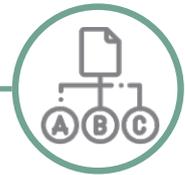
I hope in turn you find this report of value. All of us at IFSL welcome any feedback on how to improve these reports for the future.

With my kind regards,

Guy Sears

Independent non-executive Chair of the Board

## 2. The characteristics of the Funds



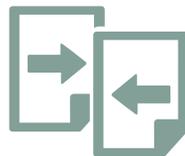
When we described our approach above, we said we considered the objectives and investment policies. In this section we summarise these characteristics of the Funds. Under each fund name we set out the objective and the benchmark against which you can assess the performance of the Funds.

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

### The benchmarks



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



*A 'comparator' benchmark is used as a performance comparator for a fund ('performance benchmark').*



*A 'constraint' benchmark restricts the composition of a portfolio*

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

## IFSL RC Brown UK Primary Opportunities Fund

### Investment objective:

*The aim of the Fund is to outperform the FTSE All Share Index over any 5 year period, after any charges have been taken out of the Fund. However, there is no certainty this will be achieved.*

### Benchmark:

*Comparator - IA UK All Companies*

*Constraint - None set*

*Target - FTSE All Share Index*

## IFSL Meon Adaptive Growth Fund

### Investment objective:

*The aim of the Fund is to grow the value of your investment over a minimum of 5 years. The Fund will do this through a combination of capital growth, which is profit on investments held, with the potential for income received by the Fund, which is money paid out of investments, such as dividends from shares.*

### Benchmark:

*Comparator - IA Global*

*Constraint - None set*

*Target - None set*

### 3. Range and quality of services

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#### 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 Funds' 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 Funds and the delivery of each 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 Funds

In this part of our assessment, there are no material distinctions between any of the share classes within the Funds, 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 Funds. It is a key part of the oversight of the Funds.

The Depositary is paid from the Funds 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 are the AFM. The Depositary for this Fund is HSBC.

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 Funds' 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 Funds by HSBC was 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 Funds. Again, this role is key in ensuring good outcomes for investors.

The Custodian is paid from the Funds 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 Funds.

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 are the AFM. The Custodian for this fund is HSBC.

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

- size and reputation within the industry
- geographical relevance for the Funds' 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.

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 last carried out this review of the costs chargeable to the Funds by the Custodian during the second quarter of 2021. This resulted in a lower fee being applied to the funds under management with IFSL.

## The Auditor

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

The Auditor is paid from the Funds 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 Funds.

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 fair 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 R C Brown Investment Management PLC (R C Brown) to manage the investments within the Funds. R C Brown are also the Sponsor and are responsible for the promotion and distribution of the Funds.

R C Brown receives a share of the Annual Management Charge payable to us under the terms of the prospectus.

We have assessed the services of the Investment Manager and Sponsor based on a mix of criteria including but not limited to:

- resource and expertise
- investment research, which is funded by the Investment Manager themselves and is not an additional charge to the Funds
- its control of transaction costs (which the Funds 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 Funds are 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 the services provided, with regard to the Funds' 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 shares in our funds, calculating our funds' dealing prices and maintaining the register of shareholders in our 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 the Fund by third parties and in-house.

## 4. Performance

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When assessing the value represented by the Funds' performance achieved 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 Funds. 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 a 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, we consider the:

- comparative outcome relative to the 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 the Fund's is set out in Section 2. Full information including the Funds' objectives and investment policies can be found in the Key Investor Information Document. These are available on our website at [www.ifslfunds.com](http://www.ifslfunds.com).

The following table shows the performance achieved by the Fund's compared to the benchmarks.

**IFSL RC Brown UK Primary Opportunities Fund**

Performance	1 Year	3 Years	5 Years
IFSL RC Brown UK Primary Opportunities Fund P Acc	-9.7%	2.3%	10.6%
IFSL RC Brown UK Primary Opportunities Fund P Inc	-9.7%	2.4%	10.7%
FTSE AllSh TR GBP	5.2%	15.6%	23.1%
IA UK All Companies	-1.6%	6.8%	14.3%

*Cumulative returns at 31.01.2023*

**Conclusion**

The Fund's objective is to outperform the FTSE All Share Index over a period of at least 5 years.

Having reviewed the outcomes achieved by the Fund over the last 5 years the Fund did not perform better than the FTSE All Share Index. It also underperformed against its comparator benchmark, which is the IA UK All Companies Share Sector, whilst taking less risk.

Over the most recent 12-month period the Fund delivered a negative return of -9.7% compared to the IA sector average of -1.6%. The Fund's underperformance is principally because of the Investment Managers portfolio construction and its resilience to recent market conditions. Despite the previous year's performance being good, this most recent underperformance is a concern, and we conclude that the Fund did not provide value during this period.

We will monitor the Fund closely over the next 12 months to ensure the Investment Manager takes steps to target improvements and engage with the Investment Manager where necessary.

**IFSL Meon Adaptive Growth Fund**

Due to the Fund launching in April 2022 it has not been possible to assess the Fund against its objective which has a minimum timeframe of 5-years. It is therefore too soon to make a meaningful value assessment of performance.

## Important Information

Capital is at risk. Past performance is not a guide to the future performance. Investments can go down as well as up and investors may not get back the amount originally invested. This can be as a result of market movements and exchange rates between currencies.

The Funds 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 IFSL RC Brown UK Primary Opportunities Fund will be exposed to smaller companies which are typically riskier than larger, more established companies. Difficulty in trading may arise, resulting in a negative impact on your investment. Shares in smaller companies may be harder to sell at a desired price and/or in a timely manner, especially in difficult market conditions.

The IFSL RC Brown UK Primary Opportunities Fund invests mainly in the UK therefore investments will be vulnerable to sentiment in that market which may strongly affect the value of the Fund.

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

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. In extreme market conditions redemptions in the underlying funds or each Fund may be deferred or suspended.

A more detailed description of the risks that apply to the Funds can be found in the prospectus. You are required to read the Key Investor Information Document (KIID) before making an investment. The KIID and prospectus for all funds are available free of charge at [www.ifslfunds.com](http://www.ifslfunds.com) or by calling 0808 145 2500.

*This report contains FTSE data. Source: FTSE International Limited ("FTSE") FTSE 2020. "FTSE" is a trade mark of the London Stock Exchange Group companies and is used by FTSE International Limited under licence. All rights in the FTSE indices and/or FTSE ratings vest in FTSE and/or its licensors. Neither FTSE nor its licensors accept any liability for any errors or omissions in the FTSE indices and/or FTSE ratings or underlying data. No further distribution of FTSE Data is permitted without FTSE's express written consent.*

## 5. AFM costs in general

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### What have we considered?

We have considered each component 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 Funds to the AFM and the Investment Manager.

**Depositary fee**

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

**Custody fee**

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

**Audit fee**

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

**Registrar fee**

This is a small fixed annual fee per shareholder account, paid to the AFM for monitoring 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 each of the Funds.

**FCA fees**

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

## Ongoing charges figures per fund

Fund	Share Class	Ongoing Charges Figure (OCF)
IFSL RC Brown UK Primary Opportunities Fund - Income	P Class	0.87%
IFSL RC Brown UK Primary Opportunities Fund - Accumulation	P Class	0.87%
IFSL Meon Adaptive Growth Fund P Income	P Class	0.89%
IFSL Meon Adaptive Growth Fund P Accumulation	P Class	0.89%

The ongoing charge figures above are based on actual expenses for the year ending 31 January 2023. They cover all aspects of operating the Funds during the year, including the fees paid as described at the start of this section 5. It does not include payments to your financial adviser through an adviser charging agreement, and/or any other firm through which you invest. You pay for their services directly.

IFSL do not apply exit charges, initial charges or performance fees to the Funds.

## Conclusion

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

We consider the different share classes and their charges later in this report in section 9.

## 6. Comparable market rates

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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 mean that we believe 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 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 their 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 Funds with other similar funds in the market. This comparison uses the P share class, that is, the share class that most investors are in. We then consider different charging between share classes of this fund later, under the heading "Share Classes".

### Conclusion

We are satisfied that the costs are reasonable in regard to the factors outlined above.

## 7. Comparable services

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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 these Funds 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 Funds, 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 the costs of the Funds are reasonable and appropriate having regard to the factors above.

## 8. Economies of scale

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### 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 as the effect of those fees on costs and charges reduces. 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

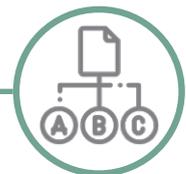
The second area of economies of scale is where we can negotiate terms for the large number of different funds for which we act as AFM. IFSL is AFM to over 70 funds with more than £10 billion under management. We use this scale to negotiate fees wherever we think it is in the interests of all the funds 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 funds reach certain thresholds, ensuring economies of scale apply directly to the benefit of the funds and investors.

### Conclusion

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

## 9. Share classes



The share classes in the Funds differ in the way they treat income payments (either by distributing income payments or by accumulating them and reflecting this in the price) or by the level of Annual Management Charge (AMC) applied to them.

During the period under review we carried out conversions for investors in the IFSL RC Brown UK Primary Opportunities Fund who were in the A share class, into the P share class and closed the A share class so there are no longer any different features to consider. We wrote to investors to confirm when this was happening and told them how many new shares they now have in the P share class.

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

## 10. Our conclusion

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In relation to the IFSL Meon Adaptive Growth Fund, we are satisfied that the charges taken from this Fund are justified in the context of the overall value delivered to investors.

As noted in section 4 above, the IFSL RC Brown UK Primary Opportunities Funds' did not deliver value to investors during the period under review due to its underperformance. We therefore conclude that the charges taken from the Fund were not justified in the context of the value provided to investors. We are already in discussion with the Investment Manager about the Funds' performance and are carrying out a full review to identify and take relevant steps that aim to deliver the best outcome for investors.