



Due Diligence for Professional Advisers

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Thank you for your interest in W1M. This report is intended to provide details about W1M, our approach to investment and how we work alongside advisers.

For more details about any part of our service do please contact your regional sales team.

About W1M

W1M is a leading wealth and investment management firm with offices in London, Edinburgh, Glasgow, Barcelona, and Barbados. The firm offers a full spectrum of wealth and investment management services for high-net-worth and ultra-high-net-worth Individuals and Families, Charities, Independent Financial Advisers, and Institutions.

Our principal objective is to generate superior real returns for our clients through segregated portfolios or specialist funds, using a global, active, direct and flexible investment approach.

Your requirements will come first in everything that we do. We regard this as critical, therefore all client relationships sit with the portfolio managers who report directly to you.

Assets currently under management	£21.9bn as at 30 th June 2025
History	<ul style="list-style-type: none">— 1986: London & Capital and Waverton (founded as JO Hambro Investment Management (JOHIM)) were both established— 2001: JOHIM acquired by the Credit Suisse Group— 2013/2014: JOHIM name changed to Waverton Investment Management following the sale of the firm to existing management team and Somers Limited— 2015: London & Capital opened Barbados office to extend its services to Caribbean clients— 2021: Waverton opened offices in Edinburgh & Glasgow— 2022: Lovell Minnick Partners acquired a majority stake in London & Capital— 2022: London & Capital Europe launches by opening an office in Barcelona— 2023: London & Capital announced acquisition of an institutional investment team from Charles Taylor Investment Management— 2024: London & Capital and Waverton announced merger— 2025: London & Capital and Waverton consolidated their brands under a new name, W1M
Staff numbers	c.350 team comprising 76 investment professionals including the Investment team (32 individuals), 27 Portfolio Managers and 16 Wealth Advisers
Offices	London, Edinburgh, Glasgow, Barbados and Barcelona
Regulatory bodies	Regulated by the Financial Conduct Authority. We are also one of few non-US institutions that is registered with the Securities and Exchange Commission

Ownership structure

As at June'24, Waverton announced a merger with established UK wealth manager, London & Capital following approval from the FCA. The merger has reinforced commitment of capital support from Lovell Minnick Partners ('LMP'), London & Capital's private equity investor and continued investment from Somers Limited. The ultimate parent entity in the L&C Waverton group is Sabrina Topco Limited. Sabrina Topco Limited is controlled by Lovell Minnick Partners (53.5%), two Institutional investors (8.5%) and Management (38.1%). The two Institutional Investors are Somers Limited and the Ares group of companies.

Executive committee

W1M executive team members

Guy McGlashan	Chief Executive Officer
Michael Allen	Chief Operating Officer
Victoria Carroll	Chief Marketing Officer
Steve Chhoker	Chief Financial Officer
Dominic Crabb	Chief Compliance Officer
William Dinning	Chief Investment Officer
Shabina Kasak	Chief People Officer
Rupert Elwes	Head of Private Clients
George Bromfield	Head of Adviser Solutions
Robert Paul	Chief Commercial Officer
Thomas Donlon	General Counsel

Biographies for each Director are available on request or from the W1M website:
<https://www.w1m.co.uk/about/meet-the-team>

What differentiates W1M?

We believe we are differentiated by the following factors:

Independence

W1M is our business. Employees have an equity stake in the firm, thus aligning ourselves with the interests of our clients. The majority of our revenue is derived from portfolio or fund management fees therefore we are incentivised to make client assets perform. We are not product or commission driven.

Service

We work in partnership with you to ensure we provide a high level and flexibility of service. Advisers have a dedicated Business Development Manager.

Portfolio managers

Advisers have direct contact with the portfolio management team both for MPS and more bespoke portfolios.

Innovative multi-asset portfolio

At asset allocation level, our portfolios are fully diversified. Our expertise includes the use of alternative assets to support the diversification within portfolios.

Direct investment

We use mainly direct equities and bonds allowing us more investment control and transparency. Our direct holdings are augmented with third party specialist funds and vehicles where we will embrace all opportunities including open-ended and closed-ended funds, structured notes and other specialist vehicles.

Consistent performance

Global, Active, Direct. Our investment process has stood the test of time through different market conditions and business cycles. We demonstrate strong risk-adjusted returns across all asset classes and risk profiles.

Independent endorsement

We are highly rated by a number of independent agencies including, for example, Defaqto who have awarded both our bespoke and MPS services their highest 5 Star rating each year from 2014 – 2024 and ARC who have 'kite marked' our service.

Investment expertise

Our award-winning Investment team has impressive depth and breadth of experience, including global expertise with dedicated specialists across key asset classes. This is a clear point of differentiation versus many of our peers.

Value

Our focus on constructing portfolios, which are predominantly directly invested rather than through third party funds, enables us to be fully transparent on costs and ensures the total cost of investing is competitive.

Investment services

Range of services

A key strength of W1M is the breadth of investment services we provide, from award winning MPS and Multi-Asset Fund ranges through to bespoke UK portfolios and specialist segregated portfolios for overseas investors. We provide a one stop shop to meet the varying needs of different client segments.

It is important to note that the W1M investment process and philosophy, and our emphasis on direct holdings of equities and bonds feeds into all our mandate types, to provides a consistency of approach and outcome across our entire range of services.

Our broad range of services is shown in the table below:

Service range	Investment minimum
MPS on Platform	No minimum
Multi-Asset Funds	No minimum
MPS Direct	£250,000
Bespoke Portfolio – Direct Equity, Bonds & Third-Party Funds	£1,000,000
Specialist Charity	£1,000,000
International Service inc. RND and US Clients	£1,000,000
US Portfolios on Platform	£100,000
Range of single asset class Funds	No minimum

Pension, tax/insurance wrappers

Many of our portfolios are managed within specialist tax wrappers such as SIPPs and offshore bonds. We manage SIPPS through the majority of major SIPP Providers.

The offshore bond providers with whom we have links is available on request.

W1M's investment philosophy

Absolutely central to our approach is to compound superior risk-adjusted returns ahead of inflation over a business cycle.

Our core investment philosophy has remained unchanged since the business was founded in 1986, and we firmly believe in the benefits to clients of a global, active, direct and high conviction approach:

Global

A global approach provides clients with the widest set of potential investment opportunities to grow their capital in real terms over time.

Active

We strongly believe in active management, both in terms of asset allocation and security selection. What we choose not to invest in is just as important as what we own, helping us to avoid areas at risk of permanent capital loss and better protect client capital in periods of drawdown.

Direct

Our commitment to direct investment provides greater control over portfolio construction, in turn providing clients with greater transparency around what they own. We get closer to the companies we invest in.

Real returns

We aim to compound superior risk-adjusted returns ahead of inflation over a business cycle.

High conviction

Our portfolios are well-diversified. Our high conviction approach facilitates detailed knowledge of each holding, enabling better management of risk.

Responsible investment

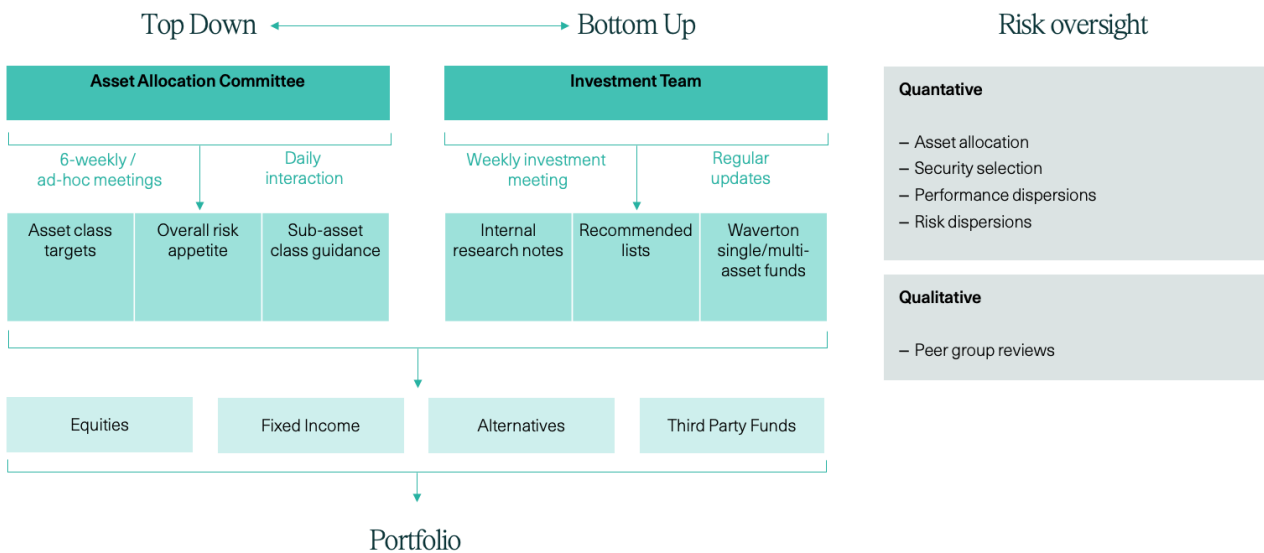
Environmental, Social and Governance factors are intrinsically linked to the long-term financial sustainability and returns of an investment, thereby forming a natural part of good fundamental research. Our integrated approach also uses engagement and voting to help influence or encourage better corporate behaviours.

W1M's investment process

W1M's investment process incorporates both bottom-up fundamental analysis as well as our views on the economic outlook (also known as top-down macroeconomic research). Regular dialogue with companies has always been an integral part of our investment process, providing both a clearer understanding of individual businesses and industries, as well as important and often more forward-looking insights on real economic activity. We blend this with analysis of global data to give us as much visibility as possible regarding the outlook from a macroeconomic, regional, industry and consumer perspective.

Our combined approach of active asset allocation and direct security selection has historically added value to portfolio returns over the long term.

One of the Asset Allocation Committee's key objectives is to identify periods during which it is appropriate to increase/reduce risk.



Top down research

The Asset Allocation Committee (AAC) is chaired by our Chief Investment Officer, William Dinning, and includes four other senior investment professionals, with representation from each asset class. The primary role of the Committee is to recommend the house position on asset allocation across all client strategies, taking into account a range of macroeconomic data and market fundamentals to identify key risks to the global economy and markets.

The Committee meets every six weeks with a broader Asset Allocation Forum held in advance of the meeting. The latter is an opportunity for all investment professionals at WIM to participate in discussions on a broad range of macro and micro issues, providing additional perspectives and insights from across the wider team.

Conclusions from the AAC feed into recommendations across all investment strategies, guiding specific short-term asset class weights. These views are immediately communicated across the firm and respective weights are reflected in our portfolio management system to be implemented in portfolios as appropriate.

WIM clients benefit from an institutional quality investment process which is rigorous, robust and repeatable, with proven results through business cycles and rotations.

Bottom up analysis

Our bottom-up research is based on detailed fundamental analysis and the identification of selection criteria that we clearly define for each asset class. We continually invest in our internal research capabilities adding dedicated analysts/fund managers across all asset classes to ensure we have a well-resourced centralised Investment team. This is in recognition of WIM's ongoing commitment to direct investment and to ensure the level of due diligence required to meet clients' long-term investment objectives in today's world of rapid digital transformation, heightened ESG scrutiny and rising geopolitical tensions.

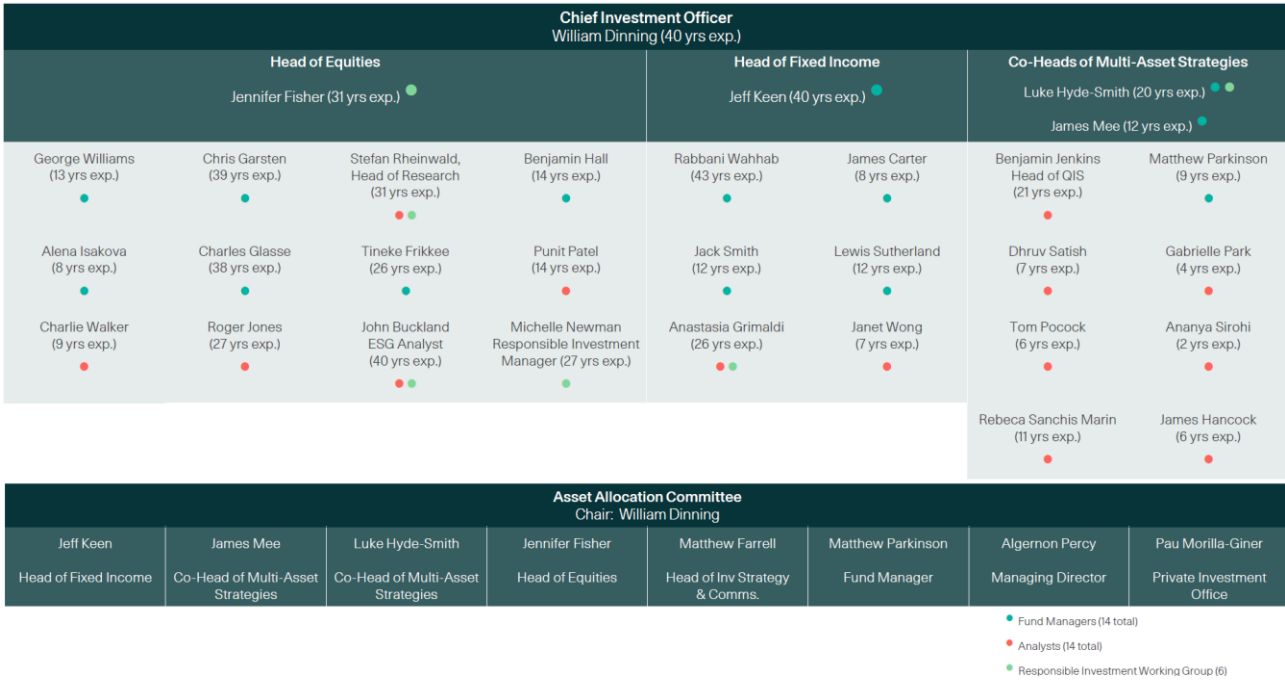
All our decisions are based on rigorous primary fundamental analysis and our Investment team conducts over 500 meetings per year with companies and managers of other investee holdings, both in the UK and overseas. Environmental, social and governance (ESG) principles are embedded throughout our investment process and we actively engage with company management, voting on our largest shareholdings to encourage positive change.

Further information on WIM's investment process can be found in the *Further information on WIM* section within this document.

Investment team

Responsibility for the Investment team sits with our Chief Investment Officer (CIO), William Dinning, with the Heads of each asset class team reporting to him. The team includes 32 individuals dedicated to investment research with an average experience of 20 years. 17 of these are single/multi-asset fund managers and 12 are dedicated analysts. Also included are four senior portfolio managers from the Private Client and Charities teams (shown in the white boxes in the chart below) who, alongside their client responsibilities, are members of either the Recommended Portfolio or Asset Allocation Committees.

The team is based out of our London office. This facilitates frequent collaboration, enabling members of the team to draw on the experience, knowledge and skill set of the whole team when identifying trends and making investment decisions. We benefit from short lines of communication, with the Investment team also readily accessible to our Portfolio Managers and clients.



W1M mandates

We maintain a range of seven investment strategies. Over the long term, we aim to achieve a return in excess of inflation (i.e. a real return). The margin is determined by the degree of risk an investor is prepared to accept and is expressed in terms of CPI+X%, where CPI is the Consumer Price Index in your base currency and X is the additional margin of return above inflation. This is a long-term objective that may not be relevant over shorter periods of time.

Our mandate range is shown below and applies to all of our investment services – MPS; Multi-Asset Funds and bespoke mandates.

Please note that our MPS does not include a Bond portfolio, which instead would be accessed through the W1M Sterling Bond Fund.

Mandate	Risk description	Time horizon (years)	Indicative volatility of returns (%)**		Indicative long-term return (%)
			Historical	Band	
Equity	High volatility	8 years	16	8 – 23	CPI+4.5%
Growth	High/medium volatility	7 years	12	6 – 16	CPI+3.5%
Balanced	Medium volatility	6 years	10	5 – 14	CPI+3.0%
Cautious	Medium/low volatility	5 years	8	4 – 12	CPI+2.5%
Defensive	Low volatility	4 years	6	3 – 10	CPI+2.0%
Conservative	Low volatility	3 years	5	3 – 10	CPI+1.5%
Bonds	Low volatility	3 years	7	3 – 10	CPI+0.5%

Another way of looking at risk

Mandate	*Risk description	Equity weighting (%)
Equity	High volatility	98%
Growth	High/medium volatility	75%
Balanced	Medium volatility	60%
Cautious	Medium/low volatility	45%
Defensive	Low volatility	33%
Conservative	Low volatility	25%
Bonds	Low volatility	0%

The above equity weightings are based on the Asset Allocation Committee's recommendation for each mandate and are based on our proposed long-term strategic allocations.

*Risk descriptions	Explanation
High volatility	A high risk of significant drawdowns in the short to medium term
High/medium volatility	A high risk of drawdowns in the short to medium term
Medium volatility	A significant risk of some drawdowns over the short to medium term, moderated by asset class diversification
Medium/low volatility	Risk of meaningful drawdowns, moderated by a high degree of asset class diversification
Low volatility	Risk of modest drawdowns, moderated by a high degree of asset class diversification. Bond only mandates are vulnerable to changes in interest rates and inflation

***Historical volatility of returns as at 31.12.2022 and based on returns since 31.12.1985. Bands reflect the potential range of volatility as a result of asset allocation changes within the indicated limits.*

Understanding risk

In order to achieve higher returns over the long term, you will almost inevitably have to accept a higher level of risk. This is usually measured by using volatility – a measure of the variability of returns. The shorter the investment time horizon and the lower your capacity to cope with short-term drawdowns (perhaps because you have pressing cash requirements), the less you can afford to invest in a volatile strategy.

However, whilst volatility is the primary measure of risk, it is important to note that there are other risks to consider, such as:

- liquidity – the possibility that you will not be able to cash in your investment quickly; and
- inflation – the risk that your investments, whilst making a positive nominal return, lose their purchasing power over a period of time

With regard to liquidity risk, we endeavour at all times to minimise this for every mandate. Protecting client assets from inflation risk, on the other hand, is more difficult. It requires the acceptance of a degree of volatility and risk to capital in the short term – although the risk of a permanent reduction in capital value can be lowered through diversification, active management and a robust and repeatable process behind security selection. Generally speaking, our higher risk mandates are likely to provide greater inflation protection over time, and lower risk mandates will be more vulnerable to inflation risk.

Third-party risk profiles

Our portfolios have been independently accessed by a broad range of third party providers.

The ratings are shown below for our MPS and Multi-Asset Funds:

MPS –

	Conservative	Defensive	Cautious	Balanced	Growth	Equity
Dynamic Planner						
Defaqto						
Synaptic						
eValue						
Oxford Risk	Oxford Risk 2/5 3/7	Oxford Risk 2/5 3/7	Oxford Risk 3/5 4/7	Oxford Risk 3/5 4/7	Oxford Risk 4/5 5/7	Oxford Risk 4/5 6/7

Multi-asset funds -

Fund	Growth	Balanced	Cautious	Defensive	Income
Dyanmic Planner					
Defaqto					
Synaptic					
eValue					
Oxford Risk	Oxford Risk 4/5 5/7				Oxford Risk 3/5 4/7

Independent assessments and awards

Independent assessment of the quality and performance of our portfolios has also been accessed by a range of providers which are shown below:



Defaqto: Our MPS and our bespoke portfolios have been 5 Star Rated from 2014 to 2025

Recent Awards: [Click on this link](#) to view all our awards and news W1M – All the latest news from W1M is published online.

W1M is an award-winning independent investment manager based in London | W1M

Managed Portfolio Service (MPS)

The W1M MPS is a core offering to financial advisers and their clients and can be held on a third party Platform or in W1M custody. The MPS On Platform is available exclusively to clients of financial advisers through the vast majority of third party investment platforms to provide a cost effective and efficient means of investment.

We strongly believe that our MPS portfolios have a differentiated approach to many of our competitors.

MPS portfolio construction

We use four specialist asset class funds as the 'building blocks' of our MPS Portfolios. This approach allows our MPS portfolios to benefit from the W1M expertise in equity and bond selection, augmented by specialist third party funds and vehicles.

In this way, our MPS provides the best of both worlds: the simplicity and ease of a platform based portfolio with the sophistication and investment range of a fully discretionary portfolio. Potential returns are not compromised by the limitations of the investments available through a platform.

The four specialist Waverton OEIC Funds are managed specifically to form the building blocks of our MPS portfolios. Each fund covers a major asset classes and the four are blended together to form a portfolio. The four funds* are:

Waverton Sterling Bond Fund

Waverton Strategic Equity Fund

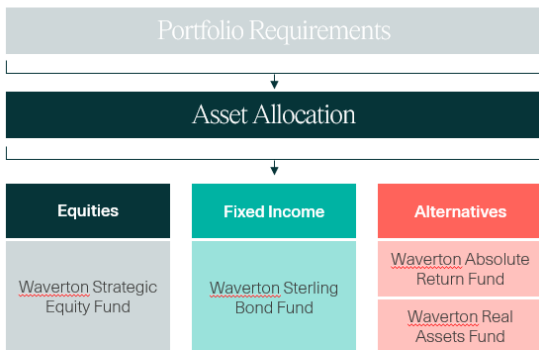
Waverton Absolute Return Fund

Waverton Real Assets Fund

*Fund Factsheets available on request and on the W1M website.

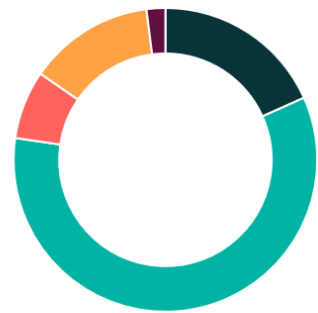
Waverton factsheets and fund reports | W1M

Importantly, the holdings of each fund are managed in a complementary way so that there is a consistent strategy through the four funds. Our approach is illustrated below:



Example balanced portfolio
*Tactical allocation

	%
Sterling Bond Fund	18.3
Strategic Equity Fund	59.0
Absolute Return Fund	7.3
Real Assets Fund	13.4
Cash	2.0



- Swift, efficient and consistent trade execution
- Access to funds and structures that would not otherwise be available
- Underlying funds accessed at institutional rates or better
- CGT and VAT benefits to structure

*Tactical allocation as at 04.06.2025 Fund Prospectus and KIID are available from W1M on request.

Fund Prospectus and KIID are available on our website.

W1M factsheets and fund reports | W1M.

For the MPS portfolios, we provide a detailed Quarterly Factsheet with a 'look through' to the underlying holdings within the portfolio as well as a client friendly Quarterly Report and a Monthly Commentary. For advisers, we also provide a Quarterly Review presentation, which is an opportunity to hear from and question the MPS Portfolio Managers. The portfolio manager can also be contacted at any time by the adviser with ad hoc queries.

Please see the 'Communication' section below for more details.

Advantages of the W1M MPS Portfolio Service

Multi-asset portfolio

By blending a variety of asset classes we seek consistent, less volatile returns than the market average through a diversified portfolio.

Access to the whole of market

Our MPS portfolio structure allows us to access funds and vehicles from the entire marketplace – we are not limited to the funds available through an investment platform. This is particularly important for more specialist holdings, such as alternatives assets.

Risk/return profile

Breadth of holdings provides important benefits to the risk/return profile of each portfolio.

Cost efficient approach

- The MPS on Platform fee is 0.4% per annum (Not subject to VAT)
- Platform trading costs are only incurred when asset allocation changes are made
- For the underlying funds, lower charges can often be achieved than are available through the platform

Tax advantages

No potential CGT liability within the portfolio when W1M trades within each fund

Consistency

Our approach means there is a consistency of holdings across portfolios, even if they are held through different investment platforms or investment wrappers

Proven performance

Proven Performance: each MPS (with the exception of the Equity MPS which was launched in December 2021) has a proven and strong performance track record over a 10 year + period.

Service

We work in partnership with financial advisers to ensure we can provide a very high level and flexibility of service and client reporting.

MPS Platform availability



Multi-Asset Fund range

W1M provide a full suite of Multi-Asset Funds from Conservative through to Growth. We also provide an income option called 'The Multi-Asset Income Fund.

The funds have a multi-asset structure and invest mainly in direct equities, bonds and alternative strategies. They are a distilled version of W1M's best ideas when compared with MPS and will maintain a relatively focussed portfolio with a high degree of flexibility. They are intended for investors for whom a single Fund structure is more appropriate, for example, for ease or tax planning purposes..

Features of the Multi-Asset Fund range:

- Active management across all portfolios
- Fund range for a wide variety of risk profiles
- Wrapped solutions offering CGT benefits
- Real return investment objectives (CPI+)
- Genuinely multi-asset, including exposure to alternatives and specialist hedging
- Highly competitive total costs
- Strategic downside protection across all funds
- A distilled representation of the equivalent Managed Portfolio Service mandate

More details of the Fund Range can be found in the Multi-Asset and Fund range overview documents, and KIIDs which are available on our website:
[W1M factsheets and fund reports](#) | [W1M](#).

Fund Platform availability

The Funds are available via a wide range of third-party investment platforms.

Our Multi-Asset Growth, Balanced and Income Funds are available on the following platforms*



Portfolio and Fund reporting and support

Adviser and Client contact

All advisers have multiple contacts points within W1M which includes a local business development manager and at least two portfolio managers. Our aim is to support your activity wherever possible and service, therefore, is tailored to your requirements both for MPS and bespoke portfolios.

For MPS and Bespoke portfolios where W1M hold custody, clients and their advisers deal directly with the portfolio manager and their team; we do not have client relationship managers.

Reporting for MPS and Multi-Asset Funds held on Platform

For our MPS portfolios and Multi-Asset Funds we provide a suite of factsheets and other sales literature. Our factsheets provide a detailed look through to the underlying holdings of each portfolio. In addition, for MPS, we provide a Quarterly Investment Report which provides a portfolio analysis, its performance and activity over the last quarter.

We also provide a Quarterly Portfolio Review, where members of the fund management team will formally report to you and your team on the last quarter's activity and our outlook. This can be either via Microsoft teams or face to face. We are, of course, available at any time to answer any queries of help with a specific client requirement.

In terms of client meetings, we are guided by the adviser. We are very happy to meet with larger clients, for portfolios managers to present at client seminars and events and for W1M to host seminars for clients. Where the MPS or Funds form part of an advisers 'Centralised Investment Proposition' we are able to provide Factsheets and reporting which are white labelled in the adviser brand. We also have a 'Partnership Programme' for our larger adviser supporters which includes, for example, a joint MPS investment committee to provide guidance on the management of the portfolio with joint representation from W1M and the Adviser.

We would be delighted to provide more details and examples of our reporting – please do contact us if you need more information.

Reporting for MPS Direct and Bespoke Portfolios

Reporting documents are agreed with clients at the outset of the investment mandate, and we can tailor these to the client's requirements.

A portfolio valuation and performance report, as well as a record of all capital and income movements, are sent quarterly to the client and their adviser if appropriate. The report is accompanied by a review letter from the portfolio manager and a copy of our latest quarterly investment commentary, "Market Perspectives".
Investment insights, commentary, and updates | W1M.

At the end of the financial year we produce a comprehensive tax report which includes:

- An end of year valuation
- Statements of all dividends and interest received
- Composite tax certificates
- An acquisition and disposal report for CGT purposes

Interim reports can be produced at any time and clients and/or their advisers may also have access to valuations online via a secure link.

In terms of client meetings, we would typically meet with clients on an annual basis but are able to meet more frequently, if required. Meetings are usually joint led by the adviser, but the client can meet with the portfolio manager on an individual basis, if required.

Costs and charges

Fee structure

Please find below the fees for the range of services that we provide. These are all shown on a clean fee basis.

Mandates	Annual management charge
MPS on Platform	0.40% (no VAT)
Multi-Asset Funds	0.40% (no VAT)
MPS Direct	0.75% (no VAT)
Bespoke Portfolio – Direct Equity, Bonds & Third-Party Funds	0.75% excl. VAT
Specialist Charity	0.75% excl. VAT
International Service inc. RND and US Clients	0.50% excl. VAT
US Portfolios on Platform	0.40% to 1.00%
Range of single asset class Funds	0.40% (no VAT)

Costs and Total Expense Ratios

We can provide detailed TERs for all our strategies on request.

Please find below the typical TER ranges for each of our core approaches.

The TERs quoted below include our annual management charges.

MPS on Platform

The W1M annual management charge (AMC) is 0.40% per annum. This is not subject to VAT.

The total cost of each portfolio, based on our current tactical asset allocation*, is shown below:

Mandate	W1M AMC*	+	Underlying costs	+	Transaction costs	=	Total cost
Equity	0.40%	+	0.05%	+	0.12%	=	0.57% pa
Growth	0.40%	+	0.06%	+	0.10%	=	0.56% pa
Balanced	0.40%	+	0.08%	+	0.10%	=	0.58% pa
Cautious	0.40%	+	0.09%	+	0.09%	=	0.58% pa
Defensive	0.40%	+	0.11%	+	0.08%	=	0.59% pa
Conservative	0.40%	+	0.11%	+	0.08%	=	0.59% pa

Source: The source is the latest European MIFID Template (EMT) for the transaction costs and the June OCFs for the underlying costs.

The costs represent the total expenses of each fund within the portfolio including the costs of any underlying holdings and administration charges.

The costs do not allow for platform charges such as platform trading charges.

*As at 04.06.25

Multi-Asset Funds

Fund	W1M AMC*	+	Underlying costs	+	Transaction costs	=	Total cost
Growth	0.40%	+	0.07%	+	0.16%	=	0.63% pa
Balanced	0.40%	+	0.11%	+	0.13%	=	0.64% pa
Cautious	0.40%	+	0.14%	+	0.12%	=	0.66% pa
Defensive	0.40%	+	0.15%	+	0.11%	=	0.66% pa
Income	0.40%	+	0.08%	+	0.13%	=	0.61% pa

Source: The source is the latest European MIFID Template (EMT) for the transaction costs* and the September's OCFs for the underlying costs.

The costs represent the total expenses of each fund within the portfolio, including the costs of any underlying holdings and administration charges.

The costs do not allow for platform charges such as platform trading charges. Portfolio asset allocation is based on the tactical asset allocation of each model portfolio.

*As at 14.05.25.

MPS Direct (W1M custody)

The W1M annual management charge for each portfolio is 0.75% per annum. This is not subject to VAT.

The total cost of each portfolio, based on our current tactical asset allocation*, is shown below:

Fund	W1M AMC*	+	Underlying costs	+	Transaction costs	=	Total cost
Equity	0.75%	+	0.07%	+	0.12%	=	0.94% pa
Growth	0.75%	+	0.08%	+	0.10%	=	0.93% pa
Balanced	0.75%	+	0.10%	+	0.10%	=	0.95% pa
Cautious	0.75%	+	0.12%	+	0.10%	=	0.97% pa
Defensive	0.75%	+	0.14%	+	0.08%	=	0.97% pa
Conservative	0.75%	+	0.15%	+	0.08%	=	0.98% pa

The fee would include custody charges with our preferred custodian.

The source is the latest European MIFID Template (EMT) for each W1M fund within the portfolio. The costs represent the total expenses of each fund, including the costs of any underlying holdings and administration charges.

*As at 04.06.25.

Bespoke portfolio

TERs typically range from 1.10% - 1.25% (before VAT).

No additional W1M dealing commission on either equity or fixed income transactions will be charged. As a result of MiFID II, we are pleased to confirm that we have decided to bear all third-party broker research costs on our own P&L, and will therefore only pass on to clients the cost of broker execution for direct equity trades. A charge of 0.1% will be applied to the value of any foreign exchange which takes place to settle transactions.

There would be no extra charge for custody, provided custody is with our preferred custodian banks, SEI Investments Europe Limited for onshore clients and SEI Investments Guernsey Limited for offshore clients. Any investment in W1M managed funds would be excluded for management fee purposes. If we were to invest in external funds we would negotiate, where possible the institutional share class and invest at NAV, with no upfront commissions charged by the fund.

Adviser fees

Where required, W1M can facilitate a client fee payment from the client portfolio to the client's adviser. To facilitate payment, the client is required to formally advise W1M, as part of their application process, that they would like W1M to facilitate payment and the amount and frequency of the payment.

Custodian and service providers

Major service providers

Onshore Custodian	SEI Investments (Europe) Limited (“SEI”)
Offshore Custodian*	SEI Investments Guernsey Ltd (sub-delegated to HSBC Guernsey)
Operational and Technology Platform	SEI Investments (Europe) Limited (“SEI”)
Legal Advisor	Paul Hastings LLP
Auditors	Saffery Champness LLP
Bankers	The Royal Bank of Scotland plc
W1M Service Providers Fund Administrators – Ireland Fund Management Company	CACEIS Investor Services Bank S.A. FundRock Management Company (Ireland) Limited
W1M Fund Administrators – UK	Link Financial Solutions Ltd

*In some circumstances, a client may nominate a specific custodian although this may incur additional costs.

About SEI

W1M have chosen SEI as a strategic partner for its wealth management and operational technology platform. SEI were selected due to their expertise and willingness to support our future business growth and service requirements. SEI have a 15+ year track record of delivering services to the UK wealth management industry and a strong reputation for investment in technology and service delivery.

SEI provide custody services through several leading global providers such as HSBC Securities Services, AllFunds and CoFunds. SEI is authorised and regulated by the FCA and as such complies with FCA CASS rules for the protection of client assets and money. It is standard market practice for client assets of the custodian to be pooled through multiple accounts of their sub-custodians but are fully segregated from the custodian's own assets.

Other key service providers

- Morningstar
- Bloomberg
- Reuters
- Factset
- Datastream
- GMC

Section Two – Further information on W1M

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Responsible investment

W1M has been a signatory to the Principles for Responsible Investment since May 2019 and the UK Stewardship Code since 2021. We value our inclusion in both frameworks, providing acknowledgement that our approach to Responsible Investment meets best practice standards and compliance with UK regulatory requirements. This includes the integration of environmental, social and governance (ESG) factors in our investment decisions, engagement and voting activities, as well as wider corporate stewardship standards.

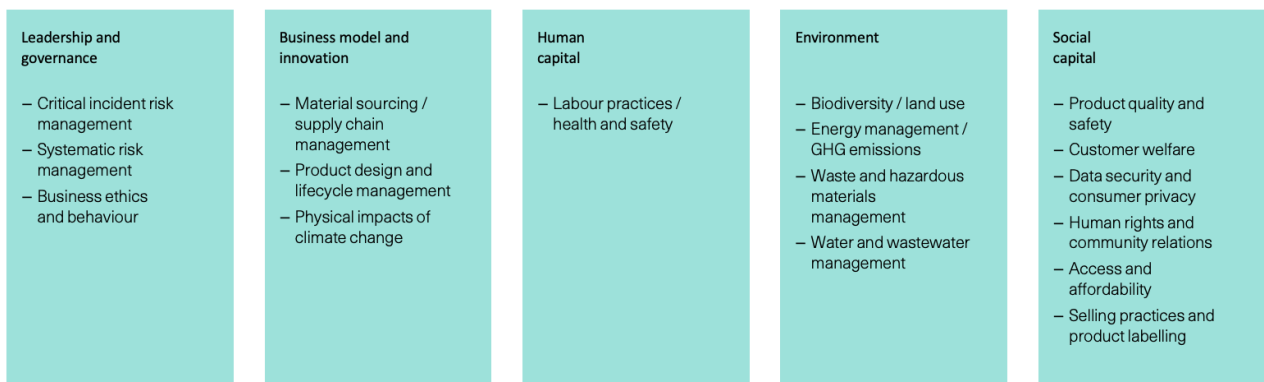
Integrated process

We firmly believe the assessment of ESG factors is an integral part of sound fundamental investment research, rather than something new to consider or part of a separate process. Governance is central to delivering a sustainable business in all its forms (durability, returns for shareholders, improving ESG standards) and has therefore always been a core part of our analysis. Similarly, when considering other relevant factors that could impact a company’s ability to generate free cash flow over the long term, it is impossible to ignore material environmental and social factors that could have significant operational and financial consequences for its business.

ESG factors are, therefore, intrinsically linked to the long-term returns of an asset and we employ a proprietary materiality framework that helps identify, prioritise and assess the most material issues of the companies in which we place our clients’ capital. This framework ensures relevant material issues within specific industries are identified and investigated in a consistent manner across the Investment Team and provides a more formal foundation for our engagement activities. Focusing on material ESG issues when evaluating a company’s performance with regards to ESG factors, is also a far more effective way to assess real-world environmental and social outcomes.

Materiality framework

Our framework is adapted from the Sustainability Accounting Standards Board’s (SASB) materiality framework and based around its five sustainability pillars. We mapped SASB’s industry classifications to Global Industry Classification Standards (GICS) sub-industry groups in order to align with our MSCI benchmark, and capture six material factors per sub-industry group, including other material factors to capture any ad hoc controversies. The assessment of corporate governance is central to our due diligence on all companies.



This framework was implemented across our Equities and Fixed Income teams in 2022 and reflected in upgrades to our internal research templates. This has enabled the automatic collation of data from our internal portal and will facilitate more specific reflections on our engagement and voting activities over time. The framework has now been implemented across our Alternatives team, albeit some of the more complex sub-asset classes require a different approach.

Non-exclusionary

Meaningful change on a global scale will take time and we believe this necessitates a pragmatic approach. At the corporate level we have chosen not to implement blanket exclusions and prefer to engage actively with companies in all industries and focus on their direction of travel. Where we identify concerns, we use engagement and voting to help influence or encourage better behaviours and report progress to clients in our annual Engagement & Voting Report.

This approach provides us with the flexibility to invest not only in those companies with strong ESG credentials today, but also well-managed businesses that we believe will successfully adapt to and mitigate ESG risks over time, and/or those that form a critical part of the transition solution. The latter two categories are often where most value is to be found. Our objective is to provide clients with a carefully considered approach to Responsible Investment, that not only creates value for them as shareholders but also contributes to incremental improvements in ESG standards and credible positive impact over time.

Specialist ESG data

The Investment team has access to specific sustainability resources through our membership of CDP (formerly known as the Climate Disclosure Project), the World Benchmarking Alliance, and ESG risk data from MSCI. While the latter can provide useful reference points, we do not use ESG ratings/scores as a decision driver in either our security selection or portfolio construction. Several of our existing research providers also incorporate an ESG perspective within their fundamental research, which we frequently find to be more relevant to our integrated approach.

The availability of reliable and standardised ESG data remains an issue for anyone in the investment industry attempting to accurately assess a fund/portfolio's ESG credentials, especially on a global basis. We therefore fully support the Financial Conduct Authority's (FCA) proposal, outlined in November 2022, to introduce regulatory oversight of certain ESG data and ratings providers through a voluntary Code of Conduct. We have shared feedback for consideration in the upcoming consultation process with the lead Chair and will continue to monitor developments and further engage when appropriate.

ESG reporting

To date, we have used MSCI's ESG portfolio analytics to provide reports on client fund/portfolio exposures. While acknowledging the shortcomings in the quality of data underpinning all third-party ESG ratings, we chose MSCI for its global, multi-asset reporting capability, and a scoring methodology incorporating an element of materiality that aligns more closely with our own approach. As the providers of WIM's performance benchmarks, this also provides an element of consistency in our reporting. We continually assess other ESG reporting offerings, however, to ensure that the data we provide clients is as transparent and informative as possible.

Outcomes

The natural outcome of our selection criteria is client portfolios with above-average ESG standards and below-average carbon risk when compared with benchmark indices. Companies which have poor or deteriorating ESG credentials usually fail our selection process on financial sustainability grounds following detailed fundamental analysis. This reinforces our view that an integrated, active and forward-looking approach is an effective and repeatable way to deliver both genuinely responsible outcomes and superior risk-adjusted returns for clients over the long term.

Engagement

Direct dialogue with company management has always formed an important part of our investment process and, as long-term investors, we aim to build constructive relationships that facilitate a deeper understanding of a company's business model and strategic direction, as well as a fuller assessment of corporate culture and governance standards. We are pragmatic in our approach and focus attention on the aspects of engagement where we believe we can be most effective in influencing or encouraging better behaviours, whether in relation to a company's management of specific ESG issues or improvements in public disclosures.

We also participate in collaborative engagement initiatives with other investor groups to drive an improvement in the availability, quality and standardisation of corporate disclosures on environmental impact, the prerequisite to a more accurate assessment of companies' current performance and their progress against targets. We signed up to two leading climate initiatives focused on improving corporate disclosures in 2021 – Climate Action 100+ and CDP – and remain actively involved in both.

Voting

We partner with Glass Lewis, a leading independent voting advisory service provider, using proxy voting where we feel there is an opportunity to enhance or protect shareholder value. An integral part of this relates to helping influence corporate behaviours in a way that will contribute to positive environmental and societal impacts.

We aggregate holdings across all four of W1M's business channels and vote on our 100 largest direct equity positions, and all other holdings owned within our regional and global equity funds (~80 additional holdings). This accounts for approximately 92% of our total equity AUM. The remainder is made up of a tail of approximately 450 holdings, many of which are single non-discretionary holdings, 60% of which are less than £100,000 in value.

The responsibility for voting decisions sits with the Investment team, who undertake all the fundamental analysis and maintain the relationships with investee companies. This is an essential part of a genuinely integrated approach to ESG. While the majority of our proxy voting aligns with Glass Lewis recommendations, we review each proposal on a case-by-case basis, paying particular attention to recommendations that are against management or relate to contentious issues on which we may have strong views. Our Engagement & Voting Report provides detail on our voting policy, the profile of ballots and proposals, with a particular look at where we voted 'Against' Glass Lewis recommendations, 'Against' management proposals or 'Against' shareholder proposals.

Our approach to screening

While W1M has opted for an integrated rather than exclusionary approach to ESG investment, some clients wish to implement negative screening policies to reflect their personal values/beliefs as a complement to our core process. We have a long history of managing these policies and an appreciation of the degree of trust that clients place in us to achieve their objectives.

Regulatory developments

Regulation to help define and validate the authenticity of ESG and Sustainability investment products has so far failed to keep pace with their rapid growth, with ongoing concerns around “greenwashing” and the mislabelling of related products/services. Europe led the way with the introduction of Sustainable Finance Disclosure Regulation (SFDR) in March 2021, although many funds have since downgraded their “sustainability” status as subsequent adaptations were introduced.

We chose not to pursue alignment with Article 8 or 9 under SFDR rules for our Dublin-listed OEICs, and are instead focusing on our domestic regulatory environment and the UK Sustainability Disclosure Requirements (SDR) being introduced in late 2023. Members of the Investment team were actively involved in the FCA's consultation process and we are encouraged by its proposals to date, as they highlight the importance of incorporating transition and engagement, as well as the shortcomings of using negative screening/exclusions as a way to achieve effective sustainability outcomes, all of which aligns well with our integrated approach.

W1M's investment process (continued)

Primary and secondary research

The Investment team conducts its own detailed fundamental research and is responsible for idea generation. During the due diligence process, the team reviews corporate reports, investor/fund presentations, AGM information and macro data, also using third-party research to complement its own analysis and provide an important diversity of opinion. This includes access to information provided by specialist ESG data providers.

We maintain a relatively concentrated number of research relationships, avoiding unnecessary duplication of content, while also ensuring sufficient breadth and differentiation of published research, direct access to analysts/industry experts we value highly, as well as entry to conferences, thematic events and company meetings.

Internal thesis reports for new securities added to "recommended lists" are written by the team, along with regular updates on key holdings. This research is uploaded onto W1M's portal and accessible to the managers in all four business channels. This provides timely dissemination of the Investment team's latest views, enabling portfolio managers to stay up to date with all relevant news, earnings results, management/analyst meetings and their latest recommendations.

Weekly investment meeting

We also hold a weekly investment meeting on Wednesday mornings. This is the forum for members of the Investment team to relay relevant market/thematic/stock information, recommendation changes or other asset class/fund information to all W1M's investment professionals. It provides the opportunity for questions and discussion across a broader audience and all participants are encouraged to suggest discussion topics ahead of the meeting, with an agenda sent out in advance. The Performance & Risk team also distribute a "Weekly Investment Pack" providing updated performance figures, financial metrics and recommendations from each of the asset class teams. This meeting is chaired by Mark Smith (Portfolio Manager) and, in his absence William Dinning (CIO).

Direct Equities

W1M has a dedicated and experienced Equities team with expertise across all major regions. The team not only provides a Global Recommended List (GRL) of stocks from which to populate clients' direct equity exposure, but also actively manages our in-house regional and global equity funds. The selection and portfolio construction process is rigorous and robust, incorporating careful assessment of overall exposures and liquidity requirements, with proven results even in the most challenging of markets.

Equity selection benefits from the team's depth of expertise, with short lines of communication facilitating regular collaboration that draws on the collective skill and different perspectives of the whole Equities team when identifying trends and generating ideas. Stocks ultimately included in the GRL have passed through several levels of due diligence and been identified as leaders within their industry group when looked at from a genuinely global perspective, rather than an amalgamation of regional best ideas, which has contributed positively to our equity returns.

Approach

Our investment philosophy has always been based on an actively managed, direct and high conviction investment approach, with a global investment universe providing our clients with the widest possible set of investment opportunities and access to companies/sectors not well represented in the UK.

We construct portfolios of 30-40 stocks and are disciplined in our stock selection. Our unwillingness to compromise on our investment criteria drives our portfolios to be benchmark agnostic but aware.

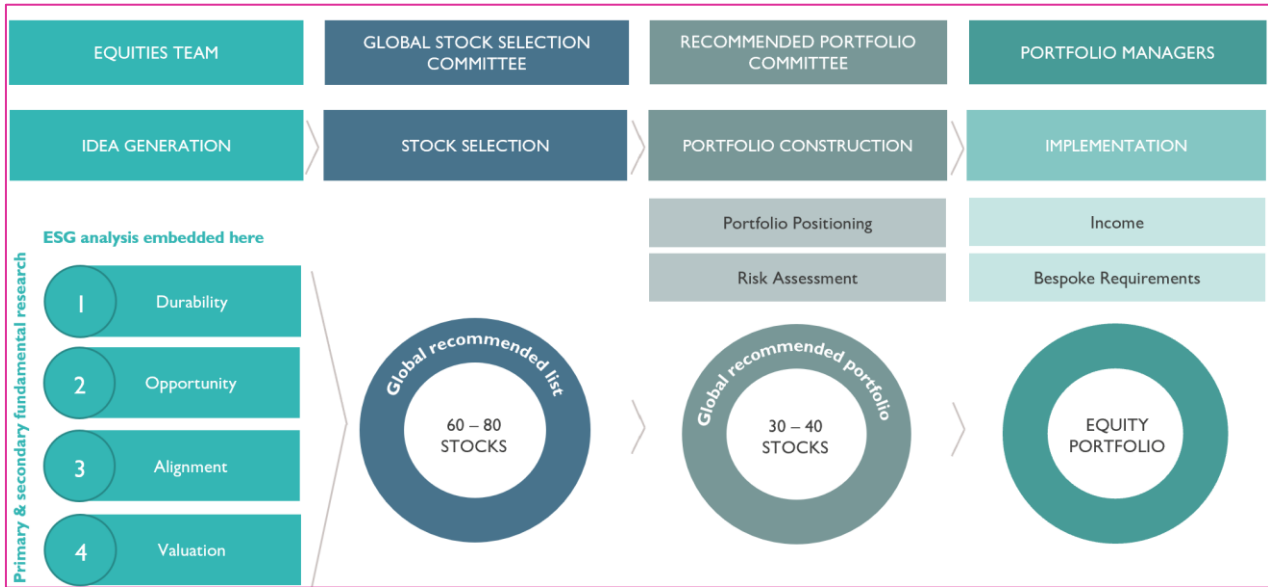
This active approach helps us to avoid areas at risk of capital loss, with the objective of better protecting capital in periods of drawdown and capturing the upside as markets rebound, thereby compounding superior risk-adjusted returns (in real terms) ahead of both the MSCI All Country World Index (MSCI ACWI) and the ARC Equity Risk peer group over the cycle.

Filtering the global investment universe

The global equity index (MSCI All Country World Index) includes approximately 3,000 companies. We require companies in our potential investment universe to have sufficient liquidity (>\$20m average daily trading volume over 12 months) so that we can liquidate positions quickly if required. In practice, this filter also removes a number of less liquid Emerging Markets where we therefore do not invest directly. Our resulting global investment universe is approximately 1,500 companies.

Investment process

We have a clear framework around our investment process, in which there are four steps (shown in the second row of the chart below). The team/committee responsible for each step is highlighted in the top row.



Step 1: Idea generation

The Equities team conducts its own detailed fundamental research and is responsible for idea generation. The experience within the team is an advantage, providing a depth of investment knowledge and long-standing relationships with companies and brokers across the major regions that help facilitate good access to senior management. The team undertakes over 500 company meetings a year (both in London and overseas) as a way to gain useful company and industry insights (including those related to customers or suppliers), but also reviews industry publications and third-party research provided by regional and sector specialists, as well as general news flow to flag potential investment ideas. Quantitative screens are sometimes but rarely used.

Step 2: Stock selection

W1M has clearly defined stock selection criteria based on our assumption that the value of a company is a reflection of the size, growth and longevity of the free cash flow it generates for its shareholders (FCF = cash flow from operations less capital expenditure). Any company which can grow revenue, improve its profit margins and/or use capital more efficiently going forward, is capable of growing FCF and we seek to identify those that are managed to maximise future cash generation.

We view FCF growth as the clearest indicator of a company's financial health and long-term sustainability, less susceptible to manipulation than earnings per share (EPS) and, given differences in regional accounting standards, a more comparable measure on a global basis. It provides management with greater flexibility to consider all strategic options to maximise growth in the future, improve returns on invested capital and create long-term economic and shareholder value. Long-term FCF generation reduces a company's reliance on external sources of capital and is particularly pertinent in an environment of tighter lending standards and rising credit costs.

We therefore aim to identify companies with:

- **Durability:** A clear and sustainable competitive advantage
- **Opportunity:** An opportunity to grow future FCF
- **Alignment:** Efficient capital allocation and aligned management incentives
- **Valuation:** A fundamentally attractive valuation given the opportunities and risks

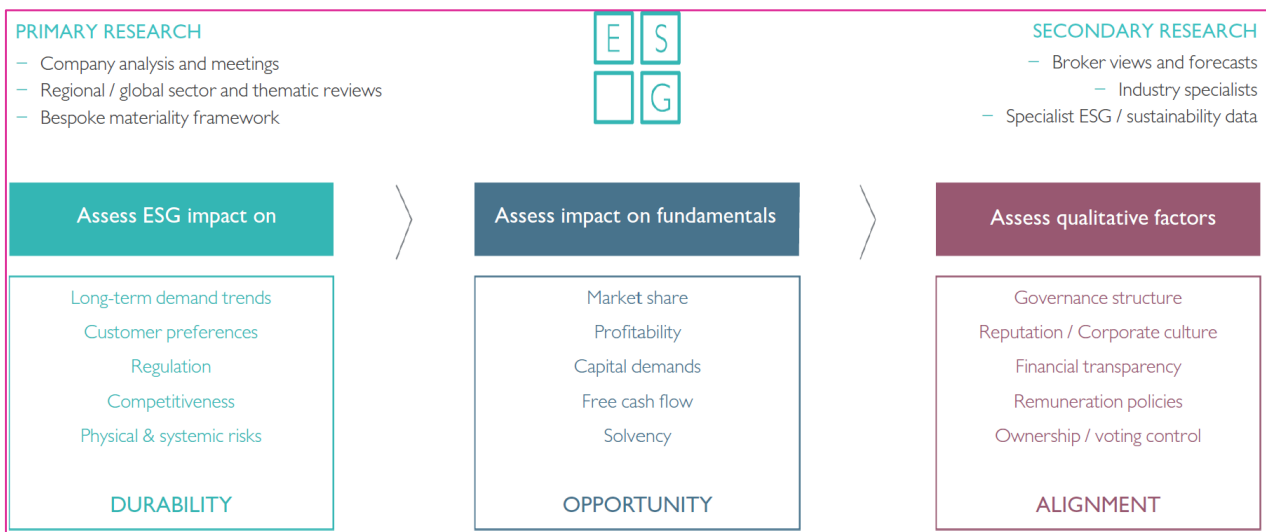
Detailed fundamental analysis is conducted at the regional level but often involves an element of collaboration across the team where there are global competitors, with consistent application of our selection criteria facilitating better global comparisons.

Integration of ESG factors in stock selection

The identification of our four key criteria ensures a thorough review of both quantitative and qualitative factors, including those related to ESG. We do not view the consideration of ESG factors as a separate process, but an integral part of the detailed fundamental analysis undertaken by the Equities team. Rather than something new to accommodate, we consider it a natural part of fundamental investment research.

We assess environmental and social factors in the same way as any other material factor that could impact a company’s financial sustainability and long-term investment performance (positively or negatively), either by enhancing/undermining its competitive position (Durability) and/or ability to grow FCF over the long term (Opportunity).

Similarly, analysis of a company’s fundamental business operations involves a thorough assessment of its governance structure/standards to ensure effective board level oversight, as well as a review of whether management is incentivised to allocate capital in a way that maximises FCF growth and minimises risk (Alignment). Ultimately, our investment decisions are based on whether the valuation is sufficiently attractive, taking into account both the long-term opportunities and the implications of any known or potential risks including those related to ESG (Valuation).



Stock Selection Committee

We implemented changes to the structure of the team in 2021, with the intention of streamlining the stock selection process and better reflecting the roles and decision-making responsibilities of the Equities team today. The Global Stock Selection Committee (GSSC) has 9 members, all of whom have dedicated investment roles and are part of the Investment team. It is chaired by the Head of Equities (Jennifer Fisher) and includes the Head of Equity Research (Stefan Rheinwald – Japan), equity specialists from each regional team, and one of the two Co-Heads of our Multi-Asset Strategies.

It is the responsibility of the GSSC to maintain and monitor a Global Recommended List (GRL) consisting of ~60-80 stocks, which is used as the reference point for Portfolio Managers across all four business channels for their direct equity exposure. The Committee meets at least monthly, providing a formal forum for detailed and objective discussions around individual companies/sectors/themes, but often meets on an ad hoc basis. Stocks recommended on the list have been identified by the committee as leaders within their GICS industry group when looked at in a genuinely global context, rather than an amalgamation of best ideas from each region. Each stock is rated A-D (A = Buy; B = Hold; C = Watch list; D = Sell) to provide an indication of conviction and a guide on timing, with average daily liquidity figures also highlighted to provide clear guidance to Portfolio Managers on suitability for various client risk profiles. Valuation is the primary (but not only) reason for a stock remaining on “watch”. Changes to the GRL require agreement from over 50% of the Committee.

Sell discipline

As long-term investors, the turnover of names on the recommended list is low. There are three reasons we sell a stock:

1. Thesis completion – If the share price appreciates to a point where the updated valuation case no longer achieves a significant positive asymmetric return (expected upside greater than estimated potential downside), the holding is reduced (and moved to a HOLD/B) or sold completely (SELL/D).
2. Thesis break – The underlying company has consistently failed to deliver the team’s expected cash flow growth, or the company no longer meets our three principal investment criteria.
3. Better alternative idea – We continually monitor other potential investments and where there appears to be an opportunity cost to holding an existing investment relative to a new opportunity, the position will be sold.

Step 3: Implementing stock selection

It is the role of the Recommended Portfolio Committee (RPC) to construct and monitor W1M's Global Recommended Portfolio (GRP) of 30-40 stocks selected from the names included in the longer Global Recommended List (GRL). This is designed to provide guidance to Portfolio Managers to ensure the equity exposure of all client portfolios is sufficiently diversified and constructed to display similar performance characteristics. It is the Committee's responsibility to:

1. Decide on portfolio positioning and position sizing (weightings are adjusted in multi-asset mandates to ensure clients have exposure to our best investment ideas and sufficient diversity to avoid unintended concentration risk or bias).
2. Assess and manage the risks associated with sector/style/regional deviations from the benchmark index.
3. Review holdings if they reach 5% of the portfolio and revisit the investment thesis if a holding falls 20% during a quarter.
4. Monitor performance attribution against the benchmark index (MSCI All Country World Index).

The Committee consists of five of W1M's most experienced investment professionals, all of whom have an institutional equity background and extensive regional expertise. It is chaired by the Head of Equities (Jennifer Fisher) and includes the Head of Equity Research (Stefan Rheinwald) and three senior Global Equity Portfolio Managers (Mark Smith, Katrina Norris and Simon Laing). The Committee meets weekly and any changes to the GRP are (where possible) co-ordinated with changes to the GRL to facilitate clear, consistent and timely communication to the portfolio managers across all business channels. Changes to the GRP need to be agreed by at least three members of the Committee and a SELL recommendation on the Global Recommended List (downgraded to D rating by the GSSC) will always result in its removal from the GRP.

Factor analysis

In 2019, members of the Investment team built a proprietary "factor" exposure tool which aggregates the entire investment universe into discrete categories of Growth, Core and Value. The Value and Growth classifications are highly correlated to changes in equity discount rates (being a function of growth and inflation expectations). We define Core stocks as medium/high return businesses either with stable end markets or more cyclical end markets displaying structural tailwinds. The framework has enabled us to study the impact of differing macroeconomic trends on style returns and to assess how our portfolios might perform (both absolutely and relatively) under different inflationary and growth scenarios. These factors are not used as the starting point for stock selection or portfolio construction but enable us to apply an additional layer of useful risk analysis.

Portfolio characteristics

While research is conducted on a bottom-up basis, macroeconomic factors are implicitly incorporated by the Equities team when they are relevant to the FCF growth opportunity (i.e. the company's cashflow is sensitive to the economic cycle) or the valuation assessment (because changing interest rates impact the discount rate used in a discounted cashflow model). Our sector/regional/style factor exposure is, however, predominantly a reflection of our stock selection.

Our investment criteria lead us to larger, well-capitalised companies with high “Quality” characteristics, irrespective of whether they are cyclical or non-cyclical or classified as Growth, Core or Value within our proprietary style framework. Quality in itself is not one of our discrete style categories. While not benchmark constrained, our portfolios will be broadly diversified, avoiding any excessive bias towards a particular sector, region or single macro factor.

We have always adopted a pragmatic approach, with the flexibility to shift the emphasis within portfolios depending on our economic growth, inflation and discount rate expectations. Our focus on future free cash flow growth resulted in a longer duration Growth bias during the low growth/low inflation period that typified the post-GFC decade, but our expectations for a very different inflation/interest rate environment and more permanent shift in market leadership over the next few years, has seen us gradually shift the balance of our equity exposure since the pandemic in 2020.

Step 4: Ongoing management

Portfolio Managers have ultimate responsibility for the construction, ongoing management and oversight of client portfolios. For segregated mandates, any specific client / investor requirements relating to income, ethical preferences and (where applicable) tax considerations, will be taken into account by the manager in the portfolio/fund construction process.

Internal guidance around stocks owned in client portfolios is provided for each business channel to ensure sufficient alignment with names recommended on the Global Recommended List, which are therefore all actively covered and monitored on an ongoing basis by the Equities team. Given the bespoke and largely segregated portfolio nature of the service provided by our Private Client and Charities businesses, and the importance of managing performance dispersion across portfolios within each risk profile, Portfolio Managers are also provided with additional guidelines around alignment with the more concentrated Global Recommended Portfolio (GRP), thereby ensuring the equity exposure of all client portfolios is sufficiently diversified and constructed to display similar factor characteristics.

The Performance Dispersion Review Committee monitors portfolio alignment on a quarterly basis and meaningful outliers are highlighted. Usually there are client-specific reasons for such divergence (e.g. legacy holdings, tax considerations, ethical restrictions etc), but where this is not the case, changes will be made to bring portfolios closer to recommended guidelines.

Fixed Income

W1M has a dedicated and experienced Fixed Income team, which actively manages fixed income portfolios and two in-house bond funds: the W1M Global Strategic Bond Fund and the W1M Sterling Bond Fund. W1M prefers to invest in securities directly, but in the fixed income asset class, a hybrid approach may be necessary, depending on the size of portfolio and the mandate. Firstly, bond issues are increasingly available only in large lot sizes (to discourage small investors). Secondly, the flexibility required to navigate the bond cycle over the next decade often persuades our fund managers to invest in one or both of the W1M funds given that they have the ability to use highly liquid derivatives to hedge certain risks such as duration and foreign exchange.

Our competitive advantage

We believe that the best way of managing the uncertainties and complexity of the investment environment is through our focused and active approach. Both our segregated fixed income portfolios and funds are constructed utilising a robust investment process, which includes (unlike many inflexible index-tracking fixed income funds) a careful consideration of exposure and liquidity requirements.

Fixed Income selection

Our approach within fixed income is differentiated in that we believe that a highly active and flexible approach will be necessary to navigate the challenges ahead for the asset class. We seek to outperform portfolio benchmarks, but we do that whilst striving to limit downside volatility and looking to generate real returns over the long term. Importantly we construct portfolios to achieve negative correlation with risk assets, especially where the fixed income allocation is part of a multi-asset mandate. Finally, in our funds we utilise derivatives to (i) hedge out unwanted risks and (ii) invest small amounts of capital in insurance against extreme tail risk events. This helps to reduce volatility, especially on the downside.



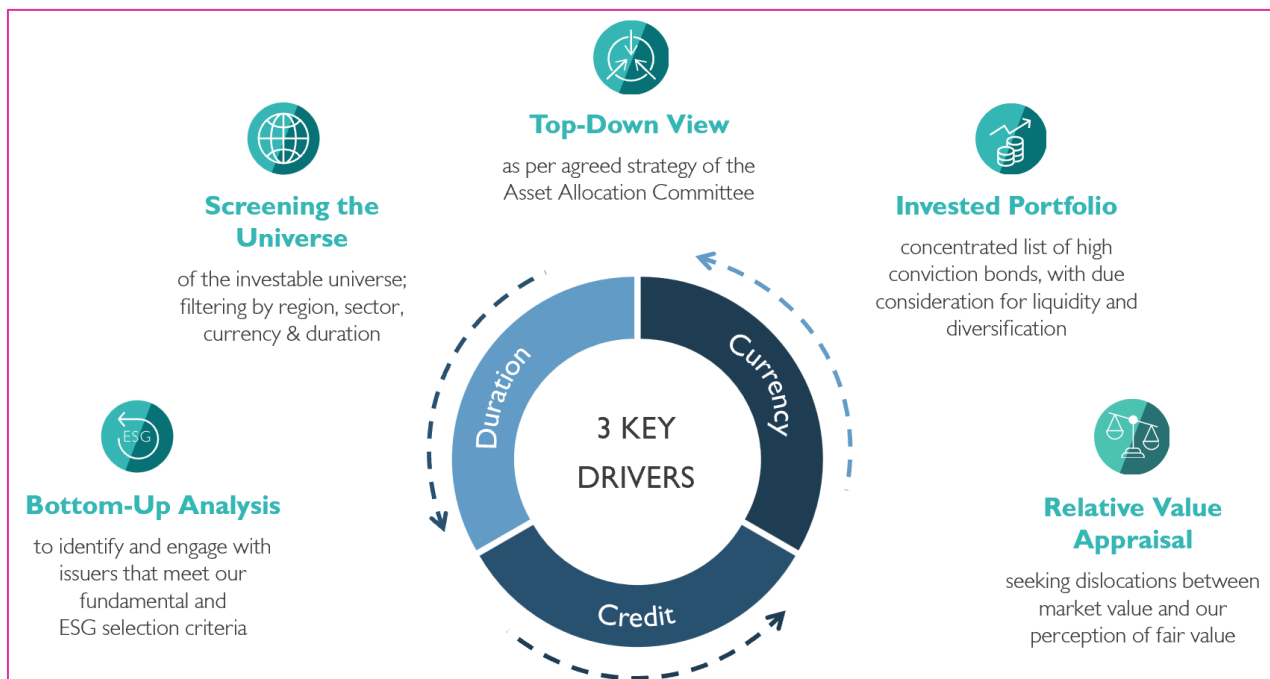
The investment process is a combination of top down and bottom up which comes together to help us assess the appropriate decisions to make on the three key drivers of bond returns – duration, credit and currency.

Top down assessment

The W1M top down view is determined at the Asset Allocation Committee which meets around eight times a year to assess the key macro fundamentals affecting the global economy, the valuation of the key asset classes and the technical and sentiment factors affecting financial markets. The Committee reviews a wide range of economic variables when assessing fixed income fundamentals including interest rates, inflation rates, fiscal balances, indebtedness, exchange rates, credit ratings and liquidity.

The W1M Fixed Income team (along with the whole Investment team) feed into that Committee with data and information gleaned from day-to-day research and interaction with companies and other issuers and will recommend a tactical approach to the asset class. The Asset Allocation Committee reviews that tactical approach for use across the firm's portfolios.

The top down view helps the Fixed Income team to focus its bottom up approach on the most suitable points of the yield curve, the best industries, regions and, where applicable, the most attractive currencies.

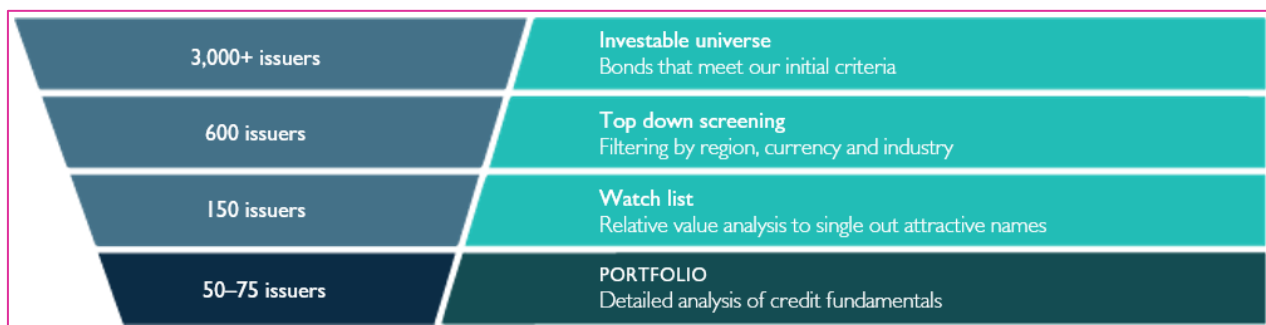


Bottom up assessment

The team employs a mix of quantitative and qualitative methods to reduce the vast universe of issuers to a list which is manageable and allows us to undertake research in a detailed manner.

The internal quantitative search narrows down the universe based on preferences on each of those three key drivers. The global universe of bonds includes some 3,000 issuers, which would be potentially relevant for our portfolios. In turn, each issuer could potentially issue multiple bonds, so there is vast choice. Our first filter step is to reduce that universe to 600 issuers by eliminating currencies, credit ratings, industries (due to cyclicity or ESG reasons) or bonds with inadequate levels of liquidity.

The next step is to reduce that list further by a simple relative value analysis, shaped by the house top down view, enabling us to focus on certain credit ratings or areas of the yield curve. This leads to a watch list, which is of a size that our team can monitor closely and look for opportunities to invest.



From a short list, the team can then carry out a bottom up detailed credit analysis on the most interesting bonds including an assessment of ESG criteria utilising our external services (e.g. MSCI). Each opportunity will undergo the same level of due diligence, internal discussion and careful consideration of risks before purchase, including (wherever possible) interaction with the management of issuers to fully understand the strategy of the business or enterprise and where the risks for bondholders might be most prevalent.

Those researched bonds can then be recommended for purchase or be placed on a watch-list, awaiting an improved buying opportunity. The sizing of positions is decided after a consideration of the liquidity available in both current and adverse scenarios.

In particular, we would take the following into consideration:

- Scale and market share
- Stability and sustainability of cash flows and profitability
- Level of debt compared to assets and earnings and affordability of debt
- Declared strategy in managing level of debt in business
- Liquidity and financial flexibility
- Risks in the activity of the issuer – cyclical, geopolitical, regulatory, ESG

We also source ideas from our network of internal and external contacts. This includes the Investment team at W1M, sell side investment banks, ratings agencies (e.g. S&P Ratings), information services (e.g. Bloomberg) agency brokers and independent research houses.

Portfolio construction

Wherever possible the team endeavour to meet management of corporate issuers and in this regard are assisted by the considerable company research undertaken by the W1M Equity team. By combining company interactions and our in-house macro views with independent external research, we aim to identify the most attractive corporate or government debt securities which make sense in a portfolio context. Typically, any new ideas are discussed within the team before proceeding with investment. That discussion will focus on the key three drivers of a bond's potential return, namely duration sensitivity, currency risk (where relevant) and credit risk.

The W1M Bond Funds are of a size which allows a relatively concentrated portfolio, providing the flexibility to be nimble and opportunistic. Investing primarily in investment grade securities, the funds also have emerging market and high yield positions to achieve a well-diversified construction. Defining features of the funds include (1) the capability to be short duration; (2) a portion of local bonds with foreign currency exposure; and (3) the use of derivatives to manage risk.

Our segregated client portfolios are closely monitored by the team and by Compliance on an ongoing basis to ensure they always meet client requirements. In addition, there is an independent, robust and multi-layered risk management process which provides a framework of monitoring and review of all mandates managed within the team. The portfolios are reviewed regularly in team meetings in an open and collegiate forum to share ideas and examine decisions taken.

We have open lines of communication with our clients so that we can immediately incorporate new requirements or subtle changes of risk appetite should they arise.

Sell discipline

There are a number of scenarios in which the team may choose to sell a bond, such as:

1. A credit, economic or geopolitical event has changed their view on the issuer/sector/region.
2. A change in the valuation of the bond makes it no longer attractive.
3. Looking to reduce risk in the portfolio.
4. Where the team have identified a compelling relative value switch from the bond into another.
5. The initial investment case failed to materialise, and the team have lost conviction in the holding.

In the main they tend to hold on to bonds for the medium-to-long term, with a target spread that would compel them to consider trimming or selling the position. They actively take advantage of market conditions to add and reduce positions when they look relatively cheap and expensive through the cycle.

Alternatives

Alternatives is a word that can mean many different things in the world of financial services: absolute return strategies; hedge funds; commercial property; commodities; infrastructure, to name a few. To us the universe it covers is broad, but can be defined as anything that is not a clear-cut member of what we know as 'traditional asset classes', namely equities and bonds. In order to better-structure idea generation and analysis, we split the universe into two sub-asset classes: Absolute Return and Real Assets.

Absolute Return

Strategies seeking to generate a positive return over a specific period of time (usually 12 rolling months)



Real Assets

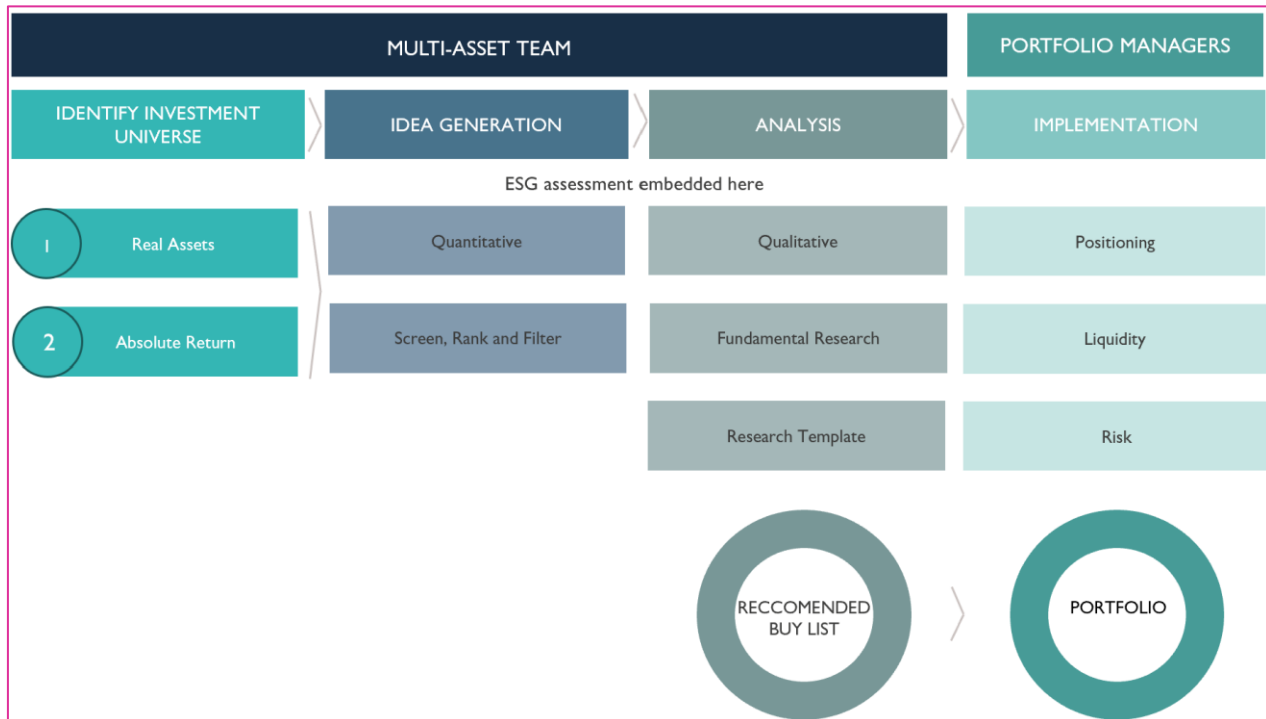
Investments underpinned by physical assets, often with inflation linked cash flow streams, seeking to provide real total return over the medium to long term



Our process utilises a range of quantitative and qualitative criteria to effectively define, analyse and select the most appropriate investment strategies from within the available investment universe. The initial stage of the bottom up process defines the investment universe across the two broad alternative asset classes' absolute return and real assets. We include the full spectrum of open-ended funds, investment companies and passive strategies, both index funds and Exchange Traded Funds (ETFs), creating a universe of investment vehicles available for selection.

The illustration displays how the top down W1M asset allocation view provides a framework to undertake further research, identify attractive investment ideas and discover potential alpha opportunities. Once combined with the bottom up security selection process, we define a subset of investment strategies that warrant inclusion, within either the W1M Absolute Return or Real Assets Funds or made available for selection by portfolio managers on the W1M recommended alternative security buy list.

Alternatives selection process



Absolute Return

Absolute Return exposure is expected to generate a positive return in a range of identified market environments and protect the portfolio in periods of market stress.

Key characteristics:

- Aim to provide a low-risk 'cash+' return while providing little correlation to equities and bonds
- Act as a hedge to equity and fixed income positions
- Generate a positive return over a rolling 12-month time horizon

Within Absolute Return, we define the universe into three buckets: Specialist Fixed Income, Structured Opportunities and Absolute Return Strategies.

1. The Specialist Fixed Income universe can be accessed either directly or via funds and is predominately GBP denominated and investment grade, and consists of short duration bonds, covered bonds, floating rate notes, inflation-linked securities and asset-backed securities.
2. Structured Opportunities are either primary or secondary opportunities structured by banks providing uncorrelated risk and return, capitalising on the in-house investment expertise in order to target specific investment opportunities. These strategies follow more of a top down and thematic investment process, are generally structured as bespoke notes and designed to generate an expected return for a given level of risk and provide diversification benefit to the portfolio.
3. The Absolute Return Strategies universe consists of collective investment schemes which fall into the following classifications; Market Neutral, Long/Short, Merger Arbitrage, Targeted Return, Absolute Return Bond, Global Macro and Managed Futures. These are split into either 'low volatility' or 'high volatility' dependant on the funds risk profile to help ensure each fund is correctly classified from a risk perspective.

Real Assets

We define Real Assets as long-only, return-seeking alternatives, intending to generate an equity-like return over the long term from differentiated return sources to equity beta and bond duration. The team have identified five sub-Real Asset classes which constitute the respective investment universe, namely: Property, Infrastructure, Asset Finance, Specialist Lending and Commodities. This large and growing universe provides investment opportunities across the risk and return spectrum, examples of which are detailed below:

Property	Infrastructure	Asset Finance	Commodity	Specialist Lending
UK Commercial Specialist (Healthcare) Specialist (Student) UK Long Lease REIT	Social Economic Renewable Transportation Listed	Shipping Aircraft Leasing Litigation Music Royalties Healthcare	Diversified Commodity Timber Energy Climate Change Precious Metals	Property Renewable Asset Backed Insurance Direct Lending

Key characteristics:

This is a broad and diverse universe; however the sub-asset classes share some common characteristics, including:

- Linked by varying degrees to global growth and therefore likely to post rising returns in a positive economic environment
- Inflation-linked cash flows, thus providing some protection in an inflationary environment
- Cash flows delivered via coupon or dividend, providing an attractive level of income
- To date, lower mainstream investor participation, providing a relative value opportunity and helping meet a number of the challenges facing traditional portfolio construction

Real Assets are categorised into specific real asset sub-sectors such as specialist property, social and economic infrastructure, healthcare finance, specialist debt etc. This enables the team to focus on one particular area, analysing each security on a bottom up basis.

We generate ideas from an ongoing review of the universe (by sub-strategy), as well as via industry relationships; we often meet management ahead of Initial Public Offerings (IPOs) and are contacted on new equity issues by our established broker and industry network.

In determining the investment opportunity from a bottom up basis, we will spend time with the company to understand the strategy, process and management expertise, as well as risk and return profile, and how we can expect the security to perform under different economic environments.

When conducting research on Real Asset opportunities, in addition to meetings with company management, the team spends a considerable amount of time researching industry dynamics. Such due diligence includes reading industry reports, attending industry events, meeting with industry professionals, customers and competitors of the investment in question, and conducting site visits where applicable. As part of the analysis, investment models will be built, where appropriate, and used to challenge management's assumptions.

Collectives

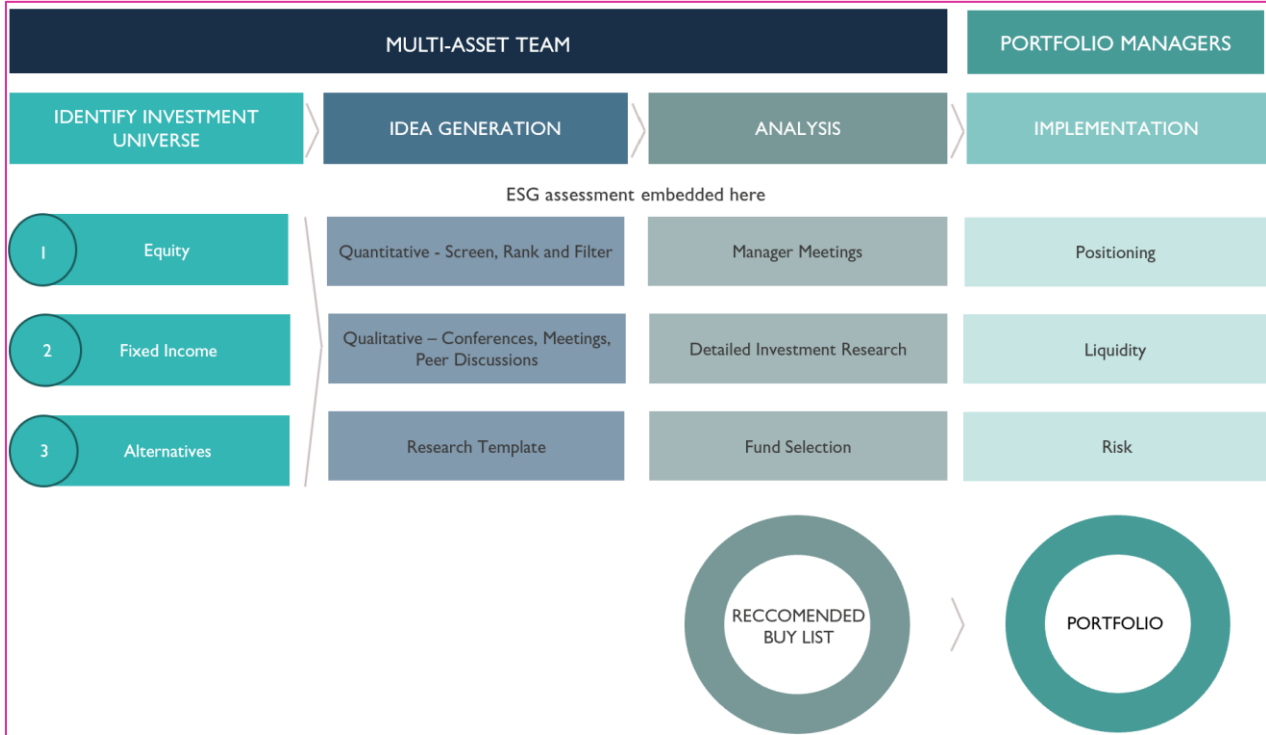
The WIM fund selection process aims to identify genuinely active, differentiated funds, managed by experienced fund managers with a sound investment philosophy. We seek to invest with the highest quality fund managers selected from across the marketplace, who we believe have a robust and repeatable process, together with a clear alignment of interests between the fund manager and investors, justifying the long-term investment of our clients' capital.

Our process utilises a range of quantitative and qualitative criteria to define, analyse and select the most appropriate investment strategies from within the available investment universe. The initial stage of the bottom up process defines the investment universe across three broad asset classes' equity, fixed income and alternatives. We include the full spectrum of open-ended funds, closed-ended investment trusts and passive strategies, both index funds and Exchange Traded Funds (ETFs), creating a universe of collective investment vehicles available for selection.

When assessing investment strategies, we seek to identify, where possible, whether the investment strategy is managed with an ESG focus. We use Morningstar data to evaluate whether the fund invests based on certain non-economic principles, such as environmental focus, social responsibility or human rights. A socially conscious fund may take a proactive stance by selectively investing in, for example, environmentally-friendly companies, or firms with good employee relations. Equally this subset of investment strategies may avoid investing in companies involved in promoting alcohol, tobacco, gambling, or in the defence industry. We also undertake deep qualitative research to understand an investment's ESG approach, which we have outlined in the ESG section below.

The illustration below displays how the top down WIM asset allocation view provides a framework to undertake strategic research, express thematic investment views and discover potential alpha opportunities. Once combined with the bottom up fund research process, we construct the concentrated WIM buy list of recommended collective funds.

Fund selection process



Screening of funds universe

The first stage of the process clearly defines the universe in order to determine the most appropriate peer group for detailed analysis. Once completed, the team utilises the proprietary W1M fund selection screen to filter and rank each security on a range of quantitative performance characteristics.

The performance statistics incorporated within this process are absolute return, relative return and various measures of risk-adjusted return. Importantly, the process utilises a large number of data points for each performance measure across numerous time periods to find investment strategies and funds which have delivered consistent performance.

Each fund within the universe is ranked on these performance measures, effectively screening the total universe on performance characteristics to assign an overall score to each, defined as a percentile rank out of 100.

When determining how an individual fund ranks within a specific peer group, we utilise the Morningstar sustainability ratings to determine whether a fund or investment strategy ranks high to low from a sustainability standpoint. Higher scores are better than lower scores and indicate that a fund has, on average, more of its assets invested in companies that score well under Sustainability's ESG methodology. More details on our ESG process are below.

W1M actively seek managers and strategies offering unique investment expertise or a means to access a preferred investment view. We are acutely aware of the limitations in backward-looking, performance-based analysis and seek to monitor and review each asset class universe in a robust, repeatable manner. Through the thorough and consistent research on the available universe, the team builds a targeted and focused list of preferred funds warranting further research at the detailed fund analysis stage.

Detailed fund research – Quantitative

Following identification of a subset of strategies for additional research, quantitative analysis is undertaken to understand and evaluate the performance track record in more detail. A thorough, individual quantitative report is produced to provide insight into the fund attributes. These reports are tailored for each asset class and investment type, to ensure we analyse the most relevant data set for each security in question.

The research undertaken enables the team to gain a deeper understanding of the security and crucially determine whether there is a clear, definable and demonstrable out-performance track record. Our research seeks to identify relative and risk-adjusted outperformance, over what time frame this has been achieved, and importantly whether this has been delivered within acceptable risk parameters.

The next stage of the process is to analyse the style and positioning of the fund. If the fund is an equity fund, holding data is analysed to determine fundamentals, style, current positioning and how this has evolved over time. This helps build further knowledge of the underlying holdings within the fund, level of activity over time and whether this marries with our understanding and questioning of the manager during our meeting.

Detailed fund research – Qualitative

In conjunction with this quantitative research, the team undertakes a thorough qualitative assessment of the investment approach and process. We aim to determine whether there is a transparent, understandable and repeatable philosophy and process underpinning the investment approach, which further enhances our understanding of the ESG credentials and hence suitability of a particular fund for investment.

We spend a great deal of time, researching the investment manager, collecting information on the strategy and meeting the managers in person. This helps gauge whether we believe the team and fund manager have the necessary skill to consistently apply the investment process and deliver the identified alpha ongoing.

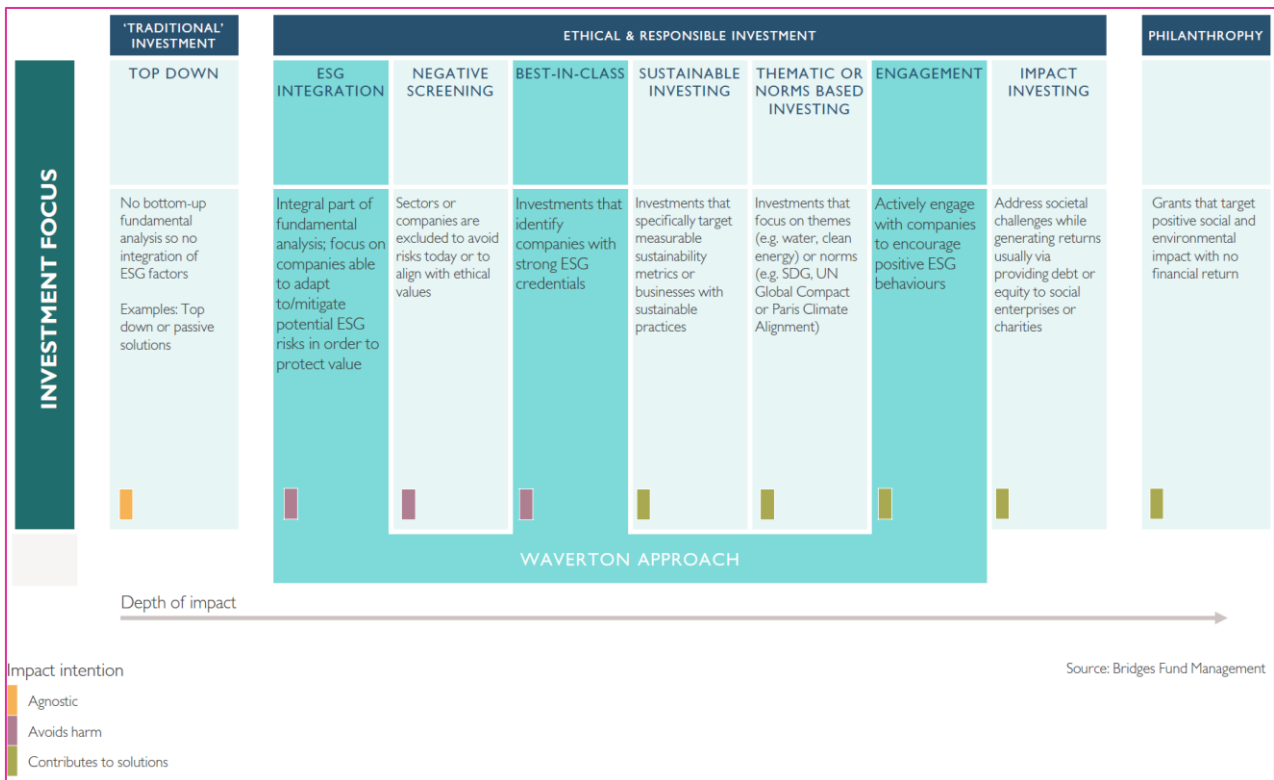
Our fund selection meetings are conducted to gain a thorough understanding of the manager's investment process, style and risk controls. On average, we meet in excess of 150 managers each year. This research process allows the team to either build conviction in the approach, or conversely remove the fund from further analysis. We have a great deal of in-house expertise and experience, and it is often the debate and team interaction which draw out the positive and negative factors with regards to a fund's investment characteristics. This forms a vital part of the qualitative approach followed to determine the final decision on a fund's suitability for investment.

ESG process

We assess any collective investment vehicles using the Spectrum of Capital, see below. This framework has been adapted to be applicable to W1M's investment process from the Bridges Fund Management and the Impact Management Project framework and allows us to assess the ethical and responsible investment approach of a fund. It provides a tool for fund selection in the first instance but also determines what we can expect in terms of stewardship activities and feeds into the ongoing monitoring of a fund. The framework allows us to assess the overarching fund approach towards ESG and Responsible Investment before undertaking further relevant analysis around the following areas:

- Firm and culture: Does the business align with stakeholder interests?
- Investment process: How does the fund incorporate its ESG approach and does it align with approach identified in the Spectrum of Capital framework?
- Fund outcomes: Evaluation of the investment process outcomes to ensure alignment with the ESG approach
- Oversight committees and risk: Does the firm and investment manager have sufficient third-party scrutiny in place?

Given the complexity surrounding the collectives space, which is highly nuanced with many different sub-asset class types across equities, bonds and alternatives, we expect our process to continue to evolve as regulation, data quality and frameworks develop.



In terms of engagement, the Collectives process benefits from all engagement activities undertaken by the Equities and Fixed Income teams. Additionally, where we identify an issue with management in alternatives or a real estate investment, which we feel is to the detriment of the best interests of shareholders financially or otherwise, we will engage directly with portfolio companies. In the first instance, we will voice our concerns to both the company's broker and management. Should the issue persist, we start informal conversations with the board before formally writing to the board if the issues are not resolved. We engage with other shareholders on the issues where appropriate and often initiate conversations to voice our concerns. Divestment is our ultimate recourse should we feel there is a thesis break and/or the response to our engagement efforts have not mitigated our concerns and we have taken this course of action historically.

With regards to collective investment vehicles, we delegate engagement and escalation. We ensure that our collective vehicles have engagement and escalation policies/records, in line with their ESG and sustainability approaches. We expect all our third-party funds to actively monitor their investments and escalate appropriately in line with their engagement process, and report effectively to us as owners. This also includes ensuring our asset managers meet with management on relevant issues, file shareholder resolutions which promote sustainability and stewardship, and we also encourage asset managers to undertake collaborative engagements with other investors to help encourage progress and expand their reach.

Recommended buy list

Our preferred list of funds is collated based on our rigorous quantitative and qualitative research. We also seek to ensure we have a differentiated selection of collective investment vehicles across market capitalisation spectrums and investment styles to suit the wide range of market conditions.

We seek to ensure that we have a concentrated buy list and that we have funds and strategies which interact well and complement each other to provide diversified exposure.

Monitoring

The fund selection process involves on-going research, evaluation and monitoring. In particular, for those funds in which we invest, we maintain a close and regular dialogue with the fund management team, seeking to meet them at least every 12 months but more frequently if there is an important event, such as unusual levels of volatility or an identified change in investment style.

We actively monitor existing holdings on a daily performance watch list and utilise a weekly fund chart pack to review performance ongoing. Closely tracking quantitative performance can be a vital indicator to changes in fund manager behaviour or positioning, warranting additional research. If this change is expected or easily understood, we can maintain our position. If not, we will investigate and can quickly arrange an update with the manager in person or via conference calls to discuss.

We aim to be a better, more informed buyer of collectives, which often, in our experience helps and aids the process of selling, 'a better buyer, makes a better seller'. We undertake frequent updates and meetings with the managers, and each sector falls within the W1M annual review schedule.

Following a thorough analysis that includes a formal investment note, we will consider whether the security is suitable for recommendation to Portfolio Managers, or for investment into the respective investment funds. Where we believe the security is suitable, the investment will be included within the W1M Stock and Fund Buy List, from which Portfolio Managers will be able to select investments for inclusion within portfolios.

Administration

Our commitment to cyber security

In a world of ever-increasing security attacks, ranging from opportunistic hackers using pre-built tools through to targeted and well-resourced cyber fraud, protecting and safeguarding client data has never been more of a priority. Our high-end monitoring programme and security tools ensure that threats are kept to a minimum and that your personal data is protected. We are dedicated to helping to protect client assets and data from the risks of cyber fraud attacks. We have implemented the following controls and measures to ensure that your data is secure:

- We use 20% of our annual IT budget on security, which is above the industry average and reflects our high standards and expectations
- We have a SOC (Security Operations Centre) service in place, which provides 24/7 monitoring, detection and response to any security incidents or threats
- We follow the NIST (National Institute of Standards and Technology) framework, which is a globally recognised best practice for managing cyber security risks and improving resilience
- We automate patch management for third-party applications and security patches, which ensures that our systems are always up to date and protected from vulnerabilities
- We conduct regular external testing by accredited security specialists, who assess our security posture and provide recommendations for improvement
- We perform regular phishing testing on internal staff, which helps to raise awareness and prevent human errors that could compromise our security
- We require compulsory cyber security training for all staff, which educates them on the latest threats and best practices for protecting themselves and the company
- We backup data regularly and maintain a disaster recovery plan that ensures the availability and integrity of the data in case of any emergency or incident
- We limit the access to client data to only authorised staff who have a legitimate business requirement

We continue to monitor existing threats and in this constantly evolving space, identify potential threats whilst striving to implement the necessary controls and processes to mitigate those risks.

Portfolio risk management

Management of risk is primarily the role of the Portfolio Manager, who is supported by the Asset Allocation Committee, Stock Selection Committee, Performance Review Committee and our Performance & Risk team.

Performance Review Committee

The role of the Performance Review Committee (PRC) is to review, challenge and escalate significant findings that have been identified by the Portfolio Dispersion Review Committee (PDRC) or the Portfolio Risk Review Committee (PRRC). This is in relation to portfolios or investment funds that have been identified as possibly falling outside W1M's coherent investment process. The PRC meets quarterly and reports to the Management Committee. We have outlined below some of the controls and checks we have in place.

Quantitative checks

Investment guidelines

- Asset Allocation Committee
- Global Recommended List (Equities)
- Asset Class Ranges

Monitoring portfolio construction

- Statistical Risk Monitoring (ex-post)
- Volatility/Style Factor Monitoring
- Statistical Risk Monitoring (ex-ante) – VaR, Volatility, Tracking Error, Liquidity, Stress Testing and Concentration Risk

Dispersions

- Portfolio Outliers
- Performance Dispersions
- Risk Dispersions

Qualitative checks

- Peer Reviews – conducted annually by the secondary Portfolio Manager

Investment risk

Establishing the Measurement Framework for Risk Control

A mandate risk level is selected from our Strategic Asset Allocation framework for you according to the W1M 'Know Your Client' on-boarding process, this includes responding to a detailed questionnaire to help effectively judge suitability. It also relies on dialogue to build up knowledge regarding risk appetite not captured in questionnaire responses. Investment ranges are set around the neutral point, or the Strategic Asset Allocation for equities, fixed income and cash. This enables calculation of an implied risk range, derived from historical observations of volatility and associated maximum drawdowns for each mandate and clients will observe these periods as part of the assessment process. The asset class weighting framework is the primary driver of investment risk and the implied volatility ranges are a result of investment weightings, (see our volatility bands in our Guide to Investment Mandates).

All invested portfolios at W1M are managed and monitored in context of these ranges. The volatility ranges are used to flag risk but are not the primary cause to reduce risk. Should a volatility range be breached, W1M will take a holistic and pragmatic approach to managing client assets. This is to mitigate against crystallising a permanent loss of capital that can result from following hard rules. Further explanation is detailed in the following sections.

Understanding and interpreting risk and risk ranges

We recognise that the plurality of risk depends on the perspective of the individual client and their own interpretation. Our view of risk incorporates volatility and other statistics but is best described as a permanent real loss of capital. This differentiates W1M from other investment houses, since we rely on our assessment of capital loss and do not operate hard limits on any one specific risk measure. W1M seeks to understand whether there is permanence to a sharp move in market price by understanding the changes in the future revenue streams of the assets we own. Therefore, we will not necessarily sell risk assets in volatile periods. This is a deliberate feature in order to avoid crystallising losses at times of maximum uncertainty. The Global Financial Crisis is a good example of this approach working successfully for our clients and the long-term value of their portfolios.

Risk of permanent capital loss

We aim to prevent the risk of permanent capital loss at portfolio level by:

- Applying appropriate diversification
- Investing in well-capitalised companies which have an enduring franchise and predictable cash flows
- Managing the time horizon and liquidity requirements of the portfolio

These criteria are observed in conjunction with quantitative portfolio risk measures generated by our systems. The data informs Portfolio Managers and is an integral part of the independent review process.

Risk systems and measures

The primary risk analysis technology we utilise is the FactSet Multi-Asset Class system supported by proprietary software. These systems may provide risk statistics on both an ex-post and ex-ante basis. The quantitative measures used in the investment process are listed as follows:

- Volatility (standard deviation)
- Value at Risk (VaR)
- Tracking Error and Active Share
- Sharpe and Information Ratios
- Maximum Drawdown
- Correlations (asset class, sub-asset class, intra sector, stock-to-stock)
- Concentration Risk and Beta
- Liquidity (Time to liquidate)

Currency risk

Currency management is necessary to protect the income in the base currency in fixed income securities. These instruments do not benefit from the self-correcting characteristics which equities enjoy. We therefore undertake hedging within our in-house bond funds in order to ensure that the returns are secure in the base currency.

We will not typically hedge currency exposure of our equity investments at the portfolio level. Currency exposure of a company will be considered but we believe hedging is often imperfect or even counter-productive due to the international nature of companies' earnings and balance sheets. The hedging policies that the companies themselves have in place can also distort accuracy.

Furthermore, it can be demonstrated that in the long term, currency investment is a 'zero sum game' and the expected return on different developed equity markets should be unaffected by currency considerations over the longer term.

With regard to emerging markets, where currency volatility is a bigger issue and where listed companies do not tend to have the same international reach as they do in developed markets, we will avoid exposure if we are concerned about the outlook for the currency. Our bottom up approach to equity selection will aim to identify the source of revenues and locality of costs, as well as the company's policy toward hedging. Should a company be identified to carry significant currency risk, this would form part of the investment case and be evaluated in conjunction with the other parts of the investment case.

Compliance

We have an in-house compliance team of 5 individuals and the Head of Compliance is a member of our Executive Committee and also the Risk Committee. A senior member of the Compliance team is a member of the W1M CASS Committee. We have a Compliance Manual which all W1M employees are required to read and established policies and procedures.

Operational controls

Managing operational risk is a core element of W1M's business activities and operational risk (OR) is an inevitable consequence of being in business. Our aim is not to eliminate every source of OR but to provide a framework that supports the identification and assessment of all material OR and potential concentrations in order to achieve an appropriate balance between risk and return.

W1M has risk appetite established via a complementary set of qualitative and quantitative objectives defined at the firm-wide level and embedded throughout the firm's business by company policies, limits and authorities.

W1M's risk management and control principles are consistent with the three lines of defence MPS.

1. **Business Management:** Business management, as first line of defence, own their risk exposures and are required to maintain effective processes and systems to manage their risks, including robust and comprehensive internal controls and documented procedures. Business management have appropriate supervisory controls and review processes to highlight control weaknesses, inadequate processes and unexpected events.
2. **Legal & Compliance/Performance & Risk/ Operational Risk:** Legal & Compliance, Performance & Risk and Operational Risk act as second line of defence, providing independent oversight of primary and consequential risks. This includes setting risk limits and protecting against non-compliance with applicable laws and regulations. Any material exceptions are reported to the Risk Committee as well as the Audit Committee and to the Board.
3. **Internal Audit:** An Internal audit forms the third line of defence and evaluates the overall effectiveness of governance, risk management and the control environment. This includes consideration of how the first and second lines of defence meet their objectives. Any significant concerns are reported to the Audit Committee and eventually to the Board.

In this MPS, the Board is responsible for determining W1M's risk principles, risk appetite, following proposals submitted by the business management. The Board is supported by the Risk Committee and Portfolio Risk Review Committee, which monitors and oversees W1M's risk profile and the implementation of risk framework as approved by the Board, as well as assessing W1M's key risk measurement methodologies.

Risk warnings

Past performance is no guarantee of future results and the value and income from such investments and their strategies may fall as well as rise. You may not get back your initial investment. Capital security is not guaranteed.

The opinions expressed are based on current market conditions and are subject to change. The information provided does not constitute investment advice and it should not be relied on as such. It should not be considered a solicitation to buy or an offer to sell a security. It does not take into account any investor's particular investment objectives, strategies, tax status or investment horizon. The portfolio may invest in assets which are not readily realisable or where there is counterparty risk. Changes in rates of exchange may have an adverse effect on the value, price or income of an investment.

The information contained within this document relating to 'yield' is for indicative purposes only. Clients should note that yields on investments may fall or rise dependent on the performance of the underlying investment and more specifically the performance of the financial markets. As such, no warranty can be given that the expressed yields will consistently attain such levels over any given period.

Fixed income securities which the portfolio may invest in are sensitive to interest rate risk (duration) and will increase and decrease in value as interest rates change.

The returns for structured products may fluctuate according to different market conditions; you may get back less than you originally invested.

The portfolio may hold funds or vehicles which invest in derivative products such as futures, options, and contracts for differences. Although warrants and/or derivative instruments can be utilised for the management of investment risk, some of these products may be unsuitable for investors. Different instruments involve different levels of exposure to risk.

Where W1M's advice is given, it is restricted to discretionary investment management services. We do not provide advice on the use of tax or financial planning products (even if the service which we are managing is held within such a product) or non-discretionary investment.

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We encourage you to consult your tax or financial adviser.

All materials have been obtained from sources believed to be reliable, but its accuracy is not guaranteed. There is no representation or warranty as to the current accuracy of, nor liability for, decisions based on such information.

Copies of each Fund's Prospectus and KIID are available from W1M and the administrator. Details can be found on the website: www.w1m.co.uk/investment-funds.

Asset Risk Consultants (ARC)

Methodology & Disclaimers

Asset Risk Consultants (ARC) provide an independent report and analysis of our peer group.

ARC Private Client Indices – Methodology

Private Client Index (PCI)	Relative risk to equity market	W1M equivalent mandate
ARC Cautious PCI	0-40%	Defensive
ARC Balanced Asset PCI	40-60%	Cautious
ARC Steady Growth PCI	60-80%	Balanced/Growth
ARC Equity Risk	80-100%	Equity

ARC 3D Award

The ARC 3D is an award provided by Asset Risk Consultants (ARC) which indicates that W1M has committed to ARC's Investment Manager Research Programme. W1M has provided ARC with all the necessary information and fulfilled ARC's 3D Criteria to complete the due diligence programme. The criteria are satisfactory completion and maintenance of ARC's Due Diligence Questionnaire; provision of real client performance data allowing ARC to observe the typical client experience; and a demonstration of the quality of the people behind the investment philosophy and process. ARC's 3D Award is not a rating or an endorsement of the managers' suitability for a particular client, mandate, or introducer; instead it is a validation of W1M's commitment to transparency.

ARC Private Client Indices

ARC Private Client Indices ("PCI") are based on historical information and past performance is not indicative of future performance. PCI are computed using a complex calculation and the results are provided for information purposes only and are not necessarily an indicator of suitability for your specific investment or other requirements. ARC does not guarantee the performance of any investment or portfolio or the return of an investor's capital or any specific rate of return. ARC accepts no liability for any investment decision made on the basis of the information contained in this report. You should always complete your own analysis and/or seek appropriate professional advice before entering into an agreement with any PCI Data Contributor. The content is the property of ARC or its licensors and is protected by copyright and other intellectual property laws. Use of the information herein is governed by strict Conditions of Use as detailed on www.assetrisk.com/pci



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Such data will be used by W1M to administer our relationship with you and to perform any administrative, dealing, custodial and ancillary services required to enable W1M to perform its services under this Agreement. Data may also be used by W1M to update your records and to advise you of other products and services unless you have indicated otherwise.

We will not, without your consent, supply personal identifiable information about you to any third-party except where (1) such a transfer is a necessary part of the activities that we undertake, or (2) we are required to do so by the operation of the law. As an individual, you have a right under the GDPR to obtain information from us, including a description of the data that we hold on you. For further information on your rights under the GDPR, please refer to the GDPR Privacy Policy under the Legal and Regulatory section on the W1M website. Should you have any queries concerning this right, please contact W1M on 0207 484 7452 or by emailing compliance@W1M.co.uk.

Should you require any further information on anything included in this proposal, please address all enquiries to:

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Authorised and Regulated by the Financial Conduct Authority. Registered in England No 2042285

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