

Statement by the Authorised Fund Manager (AFM) to the shareholders of VT Greystone Conservative Managed Fund on the outcome of the AFM's assessment of the value provided to shareholders

For the year ended 30 September 2019

This assessment is to establish what the VT Greystone Conservative Managed Fund (the fund) has delivered to you in return for the price you have had to pay.

As discussed below during the financial year the Accumulation shares were mandatorily converted to the Accumulation R shares. Inception date for the R share classes was 3 December 2012.

The AFM is the Authorised Corporate Director of the fund, Valu-Trac Investment Management Limited (Valu-Trac). The Investment Adviser is Foundation Investment Management Limited.

The investment objective of the Company is to achieve positive returns by utilising a conservative approach to investment through a diversified portfolio of transferable securities, fixed interest securities, money market instruments, deposits, currencies and unregulated collective investment schemes to the extent allowed by the FCA Rules and selected from a global market place. This is measured over the long term i.e. 5 or more years.

	At and for the year ended				
	30 Sept 2019¹	30 Sept 2018¹	30 Sept 2017¹	30 Sept 2016²	30 Sept 2015²
Value of fund					
R Accumulation	£9.1m	£7.2m	£6.0m	£4.1m	£3.1m
Shares outstanding					
R Accumulation	7.0m	5.7m	4.9m	3.6m	2.9m
NAV per share					
R Accumulation	128.79p	125.19p	123.03p	115.79p	108.09p
Dividend per share					
R Accumulation	-	0.1899p	1.5226p	0.7903p	1.3692p
Operating charges					
R Accumulation	1.93%	1.74%	1.71%	1.31%	1.39%
Net gains/(losses)					
Capital gain/(loss)	£191k	£91k	£233k	£256k	£(22k)
Total Net gain/(loss)	£269k	£185k	£359k	£317k	£83k

¹ Source: Valu-Trac Administration Services

² Sourced from Margetts Fund Management Annual Reports and Financial Statements

Although the VT Greystone Conservative Managed Fund does not have a formal benchmark the performance can be assessed against two comparators and considering whether the objective is achieved (i.e. whether there has been capital growth over the long term (5+ years)).

The table below demonstrates that this has been achieved.

	Cumulative gain to 30 Sept 2019	
	5 years	Since share class inception 3/12/12
NAV per share		
R Accumulation	20%	32%
Comparator		
IA Mixed Investment 0-35% Shares Sector Average	22%	32%
IA Standard Money Market	2%	2%

Notes

The R Accumulation share classes were launched on 3 December 2012 when shares were issued at 97.93p each. The ongoing charges ratio is based on the actual charges and the average NAV during the period.

Data prior to 21 April 2018 is sourced from Margetts Fund Management Limited.

After this date the data source is Valu-Trac Administration Services.

In carrying out the assessment of value the following criteria were considered:

1. Quality of service

The AFM considers that a good level of service was provided to shareholders by all parties involved commensurate to the amount paid by the fund for those services. The AFM monitors the following operational services:

Depository – NatWest Trustee and Depository Services Limited

Custodian – RBC Investor Services Trust, UK branch (RBC)

The external audit is conducted by Johnston Carmichael LLP

These services are essential in ensuring that the fund operated efficiently and in the case of the Depository and Custodian the service is supervised on an on-going daily basis by the AFM. As a shareholder this means that you can be certain that your requests such as investment and redemption of the fund's units will always be carried out exactly as set out in the documentation. During the period under review the AFM had in fact changed the fund's custodian to RBC following a review of custody providers and comparing the quality of the services provided in addition to costs. Such items as recovery of withholding tax and efficiency of opening new investment markets were considered.

Valu-Trac does not delegate any of the core functions of the fund such as fund administration, fund accounting and transfer agency. This means that the AFM directly employs and supervises the individuals who are carrying out this work and that those undertaking the work are appropriately qualified and experienced. Due to this high level of supervision and control of these functions the AFM believes that the shareholders can be certain that their instructions will be carried out efficiently and that the reporting they receive is timely and focused. The AFM works closely with Foundation Investment Management Limited to coordinate mailings such as annual letters with dividend vouchers and financial reports to avoid excessive correspondence whilst providing all required reporting on a timely and clear basis. This also has ensured that the AFM has responded to any enquiries from shareholders fully and promptly.

During this financial year, on 20 November 2018, Accumulation shares were mandatorily converted to the R Accumulation share class. The only difference between these two share classes was with the

fees. The Accumulation share class had an annual management fee of 1.3% per annum while the Accumulation R shares is lower at 0.75% per annum. The ACD's preliminary charge of 3.9% on the Accumulation share classes was removed and the R class does not have this charge.

2. Performance

The AFM has assessed performance of the fund net of all the charges that are outlined in its prospectus. The total return for the Accumulation R shares for the year under review was 2.87%. This is after operating costs of 1.93%, which includes the 0.75% cost for the investment adviser (FIML) and 1.18% for the costs of underlying AFM's, and transaction costs of 0.00%. The objective of the fund is to be considered in the longer term (5+ years) so this result for 2019 is presented above along with the results of the previous four years. Over the period since the fund's R share class inception on 3 December 2012 on an annualised basis has been 4.1% or 2.5% on a "real" basis taking into account deflation by the UK CPI.

3. AFM costs - general

The costs (in £) incurred during the year ended 30 September 2019 were as follows:

Authorised Corporate Director	54,494 (VAT exempt)
Depository	18,099 (VAT inclusive)
Custodian	1,947 (VAT exempt)
Auditor	8,538 (VAT inclusive)
FCA	19 (VAT exempt)
Transaction costs (capital)	(642) (VAT exempt)
Other fees	245 (VAT exempt)
Total costs	82,700

Income for the year (capital and revenue) was £269,377 before taxation of £0.

There were no preliminary charges, redemption charges or performance fees paid by shareholders during the year.

It should be noted that the prospectus does not allow for redemption charges however a dilution adjustment can be charged on transactions into or out of the fund if a) the daily total exceeds 0.5% of the value of the sub fund, or b) there is a large transaction, being 5% or over.

4. Economies of scale

Over the past 5 years the ongoing charges as a percentage of assets has increased from 1.39% (for 2015) to 1.93%. However, this can be broken down into 2 parts; the charge for running and managing the fund (AMC and Fixed fees), and the cost of the underlying funds (Funds fee).

Fee	At and for the year ended	
	30 Sept 2019	30 Sept 2018
Fixed Fee	0.38%	0.41%
AMC	0.75%	0.75%
Funds Fee	<u>0.80%</u>	<u>0.59%</u>
Total OCF	1.93%	1.75%

The AFM has assessed to what extent it has been able to achieve any savings as a result of economies of scale. Where any such savings have been made this has in every case been passed on to the shareholders and can be seen in the reduction in the Fixed Fee. Examples of this are the sliding scales of both the investment manager and depositary. As the AFM grows its total assets across all schemes it uses this purchasing power to benefit all schemes.

5. Comparable market rates

The AFM has compared the charges of this fund with that of comparable funds. The AFM believes that the shareholders of the fund are achieving efficient market rates as a whole. As the AFM assets grow in total it continues to strive for extra efficiencies wherever this can be achieved for all of its schemes.

6. Comparable services

All shareholders of this fund are subject to the same service at the same cost. The services provided to this fund and the costs are also comparable amongst other similar funds operated by the AFM.

7. Classes of units

All shareholders of this fund are treated equally. There is only one class of shares being the accumulation shares.

CONCLUSION

In taking all of these criteria into consideration the AFM concludes that in assessing whether the payments out of the scheme property as set out in the prospectus are justified in the context of the overall value delivered to shareholders and that every shareholder of VT Greystone Conservative Managed Fund Accumulation R is receiving good value.

David Fraser FCCA Head of Administration Services

Douglas J Halley Independent Non-Executive Director

31 January 2020