

Key Investor Information

This document provides you with key investor information about this fund. It is not marketing material. The information is required by law to help you understand the nature and the risks of investing in this fund. You are advised to read it so you can make an informed decision about whether to invest.

VT Freedom Growth 4 (the "Fund")

a sub-fund of VT Freedom UCITS OEIC (the "Company")

Class A Income Shares (ISIN: GB00BK817S17)

Class A Accumulation Shares (ISIN: GB00BK817R00)

The authorised corporate director of the Fund is Valu-Trac Investment Management Limited

Objectives and Investment Policy

The investment objective of the Fund is to provide a return of 6.0% (after deduction of fees) over the medium to long term (5 -10 years) whilst being managed in accordance with Distribution Technology's 'Risk Level 4' (on a scale of 1 (lower risk) to 10 (very high risk)).

The Fund will seek to achieve its objective by investing at least 80% in active and passive (that is those investments which aim to track the performance of various financial indices) collective investment schemes (including funds managed and/or operated by the ACD) and exchange traded funds through which it will have exposure to investments including equities, fixed income, alternatives and cash. At least 40% of exposure will be to lower risk assets such as cash, alternatives such as absolute return strategies and fixed income.

The Fund may also invest in equities, fixed income, money market instruments, deposits, cash and near cash.

The Fund's risk profile is managed by restricting the types of assets held and allocations to those assets. The Fund will be managed in accordance with Distribution Technology's 'Risk Level 4' (on a scale of 1 (lower risk) to 10 (very high risk)) and, within Risk Level 4, is expected to be towards the higher end of this risk band.

The Fund will not have any particular geographic, industry or economic sector focus and as such weightings in these may vary as required..

The Fund will be actively managed.

Derivatives (that is sophisticated investment instruments linked to the rise and fall of the price of other assets) may be used for efficient portfolio management purposes.

You can buy and sell shares in the Fund on any business day.

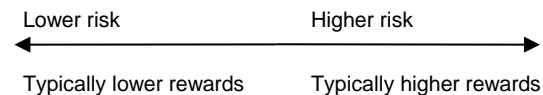
If you hold accumulation shares, income from the Fund will be added to the value of your investment (i.e. dividend income will be included in the value of your shares).

If you hold income shares, any income from the Fund will be distributed four times a year.

For full investment objectives and policy details please refer to the prospectus.

Risk and Reward Profile

The Risk and Reward Indicator table demonstrates where the Fund ranks in terms of its potential risk and reward. The higher the rank the greater the potential reward but the greater the risk of losing money. It is based on past data, may change over time and may not be a reliable indication of the future risk profile of the Fund. The shaded area of the table below shows where the Fund ranks in terms of its potential risk and reward based on historical data.



1	2	3	4	5	6	7
---	---	---	---	---	---	---

Historical data may not be a reliable indicator of the Fund's future risk profile. The risk category shown is not guaranteed and may change over time. The lowest category does not mean "risk free".

The Fund is ranked 4 because simulated monthly historical performance data indicates that average rises and falls in market prices would have occurred historically.

The risk and reward profile above is calculated by the Authorised Corporate Director on a scale of 1-7 using standard calculations based on historic volatility of the Fund. This is calculated differently to the risk scale of 1-10 referred to in the investment objective and policy, which will be calculated by an independent party (currently Distribution Technology although this could change in the future) based on ongoing analysis of the investment process and the portfolio.

The following risks are material in addition to the risks captured by the indicator above:

- Counterparty risk: The Fund can conclude various transactions with contractual partners. If a contractual partner becomes insolvent, it can no longer or can only partly settle unpaid debts owed to the Fund.
- Market Risk: External factors can cause an entire asset class to decline in value which would result in a decrease in the value of investments.
- Currency Risk: As the Fund may invest in overseas securities, movements in exchange rates may, when not hedged, cause the value of your investment to increase or decrease.
- Liquidity Risk: adverse market conditions may affect the ability to sell certain assets when necessary. Reduced liquidity may have a negative impact on the price of assets.
- Derivatives risk: use of derivatives may result in gains or losses that are greater than the original amount invested

For full details of the Fund's risks, please see the prospectus which may be obtained from the address in 'Practical Information' overleaf.

Charges

The charges you pay are used to pay the costs of running the Fund, including marketing and distributing costs. These charges reduce the potential growth of your investment.

One-off charges taken before or after you invest	
Entry charge	0%
Exit charge	None

This is the maximum that might be taken out of your money before it is invested or before the proceeds of your investment are paid out. In some cases you may pay less and you should speak to your financial advisor about this.

Charges taken from the fund over a year	
Ongoing charges	0.77%

Charges taken from the fund under certain specific conditions	
Performance fee	N/A

The ongoing charges figure is based on expenses and the net asset value as at 31 December 2020. This figure may vary from year to year. It excludes portfolio transaction costs. The Funds annual report for each financial year will include detail on the exact charges made.

You may also be charged a dilution levy on entry to or exit from the fund.

For more information about charges, please see sections 3.6 & 7 of the prospectus, together with Appendix 1 of the prospectus, which may be obtained free of charge from the address in 'Practical Information' below.

Past Performance

Past performance is not a guide to future performance.

The share class and Fund both launched on 7 September 2020. Accordingly, there is insufficient data to provide a useful indication of past performance to investors.

Performance is calculated in Pound Sterling.

Practical Information

The depositary for the Fund is NatWest Trustee and Depositary Services Limited.

You can obtain further information about the Fund, copies of the prospectus, annual reports and accounts and half-yearly reports and accounts in English, free of charge, from Valu-Trac Investment Management Limited, Orton, Moray, IV32 7QE. They are also available electronically at www.valu-trac.com.

The Fund's latest published price and other information is available at www.valu-trac.com and can also be obtained during normal business hours by calling 01343 880 344.

The Fund is a sub-fund of the Company. The Prospectus and annual or half yearly reports and accounts contain information about the Company and all of its sub-funds.

Each of the sub-funds of the Company is segregated by law. This means that the assets of this Fund may not be used to pay the liabilities of other sub-funds of the Company.

Shares in other classes may be available. Details are set out in the Prospectus. It may be possible to switch your investment at any time for shares in other classes within the Fund or for shares in a class within a different sub-fund. For further information on switching please contact Valu-Trac Investment Management Limited by calling 01343 880 344.

United Kingdom tax legislation may have an impact upon your own personal tax position. You are advised to seek professional advice on the tax treatment of your investment in the Fund.

Details of the up to date remuneration policy of Valu-Trac Investment Management Limited which includes a description of how remuneration and benefits are calculated and the identities of the persons responsible for awarding remuneration and benefits, is available at www.valu-trac.com and a paper copy is available free of charge upon request.

Valu-Trac Investment Management Limited may be held liable solely on the basis of any statement contained in this document that is misleading, inaccurate or inconsistent with the relevant parts of the prospectus for the Company.

The Fund is authorised in the United Kingdom and regulated by the Financial Conduct Authority. Valu-Trac Investment Management Limited is authorised in the United Kingdom and regulated by the Financial Conduct Authority.

This key investor information is accurate as at 31/12/2020.