

Valu-Trac Investment Management Limited

Annual Assessment of Value Statement as at 31 December 2023

VT Price Value Portfolio

Fund Information

Investment Manager:	Price Value Partners Limited
Authorised Fund Manager:	Valu-Trac Investment Management Limited (Valu-Trac)
Investment Objective:	The investment objective of the VT Price Value Portfolio is to deliver attractive long-term returns to its shareholders.
Investment Policy:	The sub-fund will invest, on an unconstrained basis, in a combination of explicit 'value' equity funds, and discrete 'value' businesses where the manager believes that the shares of those businesses stand at a significant discount to their intrinsic value. In addition, the sub-fund may also invest in other funds, transferable securities, money market instruments, deposits, cash and near cash. Derivatives may be used for efficient portfolio management purposes. There is no particular emphasis on any geographical area or industry or economic sector.
AUM (£):	£40.9m
Fund Launch Date:	01/06/2015

Our assessment has been conducted against the seven criteria outlined by the FCA and the fund has been rated via the "traffic light" system. Where a fund may have more than one unit class, the rating shown for each of these seven criteria, at a total fund level, may be thought of as being as being an average rating, based upon the rating for each unit class, and according to the relative split of fund assets, between unit classes. The overall rating for the fund will generally be a simple average of these seven criteria, taken at the total fund level. This has been summarised within the table, below:

VT Price Value Portfolio	AUM (%)	Quality of Service	Performance	AFM costs - general	Economies of scale	Comparable market rates	Comparable services	Classes of units	Overall
Overall	100.0%	G	R	G	G	G	G	G	A
A Net Accumulation GBP	31.1%	G	R	A	G	G	G	G	A
A Net Income GBP	0.7%	G	R R	A	G	G	G	G	A
B Net Accumulation GBP	9.4%	G	R R	G	G	G	G	G	A
B Net Income GBP	0.3%	G	R R	G	G	G	G	G	A
C Net Accumulation GBP	30.5%	G	R	G	G	G	G	G	A
A Net Accumulation USD	1.2%	G	R R	A	G	G	G	G	A
B Net Accumulation USD	1.1%	G	R	G	G	G	G	G	A
C Net Accumulation USD	24.6%	G	R R	G	G	G	G G	G	A
A Net Accumulation EUR	1.1%	G	R	A	G	G	G	G	A

The table below shows the overall summary for the previous assessment i.e. carried out as at 31 December 2022:

VT Price Value Portfolio	AUM (%)	Quality of Service	P	erformance	,	AFM costs - general	Ec	onomies of scale	Compa narket	rable rates	mparable services	Clas	ses of units		Overall
Overall	100.0%	G		R		G		G	G		G		G	0	А
A Net Accumulation GBP	33.6%	G		R		G	0	G	G		G		G	0	А
A Net Income GBP	0.6%	G	0	R		G		G	G		G		G	0	А
B Net Accumulation GBP	10.6%	G		R		G		G	G		G		G	0	А
B Net Income GBP	0.9%	G		R	0	G		G	G		G	0	G	0	А
C Net Accumulation GBP	29.8%	G	0	А		G		G	G		G	0	G	0	А
A Net Accumulation USD	1.3%	G	0	R		G		G	G		G		G	0	А
B Net Accumulation USD	1.0%	G	0	R		G		G	G		G		G	0	А
C Net Accumulation USD	21.4%	G	0	Α		G		G	G		G		G	0	А
A Net Accumulation EUR	0.7%	G		R		G		G	G		G		G	0	А

The 2022 assessment used previous criteria that has since been updated as described above, and therefore the results for 2022 are not directly comparable with the updated 2023 assessment.

Previous Remedial Actions

- Performance
 - Assessed as Red
 - No specific action was proposed.

New Remedial Actions

- Performance
 - Assessed as Red
 - The AFM will continue to discuss the trend in long term performance and investment risk with the Investment Manager. The AFM will also investigate the drivers of long term performance and investment risk and will present any relevant findings to the Investment Manager, for their comment and consideration, at the next scheduled Investment Manager meeting.
- AFM Costs General:
 - o Assessed as Green, overall
 - The AFM will discuss the level of the Annual Management Charge (AMC) with the Investment Manager at the next scheduled Investment Manager meeting, where applicable.

Detailed Assessment

Quality of Service

The AFM has chosen to outsource the following services to third party providers:

- Investment Management services: Price Value Partners Limited.
- Depositary services: NatWest Trustee and Depositary Services Limited
- Custodian services: RBC Investor Services Trust, UK branch (RBC)
- External audit: Johnston Carmichael LLP

Other functions such as fund administration, fund accounting and transfer agency are undertaken by Valu-Trac, and all outsourced services are subject to continuous oversight.

As part of our assessment of service providers, no systemic issues have been identified as part of our ongoing due diligence, including an assessment of investment breaches, pricing errors, complaints, fund liquidity and ongoing adherence to the investment policy.

Conclusion:



Green

The AFM has concluded that all services being provided in relation to the on-going management and administration of the fund, including those provided directly and those currently being provided by third parties, are operating as unitholders may expect.

The AFM has concluded that unitholders are receiving good value, in relation to Quality of Service.

Performance

Objective:

The investment objective of the VT Price Value Portfolio is to deliver attractive long-term returns to its shareholders.

Constraining Benchmark:

none

Comparator Benchmark:

MSCI World Value Index NR

Target Benchmark:

none

Peer Group:

IA Global Sector

Minimum Recommended Holding Period:

5 Years

Management Approach:

Active

The net total return and peer ranking (where available) for each available unit class within the fund, together with the return of the relevant benchmark, is shown below:

Net Total Return*	1 year	3 years (avg. return per-year)	5 years (avg. return per-year)	5 years Peer Rank
Benchmark	5.2%	10.9%	8.9%	-
A Net Accumulation GBP	-0.5%	0.1%	5.1%	Lowest 4%
A Net Income GBP	-0.6%	0.1%	5.1%	Lowest 4%
B Net Accumulation GBP	-0.3%	0.4%	5.3%	Lowest 5%
B Net Income GBP	-0.3%	0.3%	5.3%	Lowest 5%
C Net Accumulation GBP	0.2%	0.9%	5.9%	Lowest 7%
Benchmark	11.5%	8.3%	8.9%	-
A Net Accumulation USD	5.3%	-2.1%	4.9%	Lowest 4%
B Net Accumulation USD	5.6%	-1.9%	5.2%	Lowest 4%
C Net Accumulation USD	6.1%	-1.4%	5.7%	Lowest 6%
Benchmark	7.7%	12.1%	9.6%	-
A Net Accumulation EUR	1.5%	1.3%	5.9%	Lowest 4%

^{*}To 31 December 2023

Total return is the actual rate of return of an investment over a period. Total return includes interest, capital gains, dividends, and realised distributions (where appropriate).

Source: Valu-Trac / Morningstar

Conclusion:



Red

The net total return of each unit class within the fund, is significantly below that of its performance comparator benchmark and peer group median, over the minimum recommended holding period.

The AFM has also assessed the investment risk within the Fund. The AFM notes that the volatility within the fund appears to be significantly greater than that of its performance comparator benchmark and peer group.

The AFM will continue to discuss the trend in long term performance and investment risk with the Investment Manager. The AFM will also investigate the drivers of long term performance and investment risk and will present any relevant findings to the Investment Manager, for their comment and consideration, at the next scheduled Investment Manager meeting.

The AFM has concluded that unitholders are not receiving good value, in relation to Performance.

AFM Costs - General

Each unit class within the Fund has its own Annual Management Charge (AMC). The AMC may be thought of as being the amount deducted from a unit class's average net assets to pay for the investment management of that unit class; this charge will typically include a proportionate allocation from the Investment Management Fee, AFM fee and other, ancillary fees.

The current AMC of each unit class, together with the current, average AMC for the relevant, selected peer group, is shown within the table below:

Annual Management Charge (AMC)	Current				
Annual Management Charge (AMC)		Peer Rank			
Peer Group	0.86%	-			
A Net Accumulation GBP	0.86%	Highest 50%%			
A Net Income GBP	0.86%	Highest 50%%			
B Net Accumulation GBP	0.61%	Lowest 29%			
B Net Income GBP	0.61%	Lowest 29%			
C Net Accumulation GBP	0.11%	Lowest 8%			
A Net Accumulation USD	0.86%	Highest 50%%			
B Net Accumulation USD	0.61%	Lowest 29%			
C Net Accumulation USD	0.11%	Lowest 8%			
A Net Accumulation EUR	0.86%	Highest 50%%			

Source: Valu-Trac / Morningstar

Conclusion:



Green

The Investment Management Fee is proposed by Price Value Partners Limited. Owing to the limitations of the host AFM model which the AFM operates, the AFM is unable to comment upon the specific profit margin this fee may generate for Price Value Partners Limited; instead, the AFM will focus upon ensuring that this fee appears reasonable, in the context of the overall AMC.

The AFM fee is payable to Valu-Trac to cover the services undertaken by Valu-Trac as outlined in the Quality of Service section. The AFM will set fees based on the overall cost of operating the business. Most of the AFM's costs are fixed (such as staff and property costs), and the AFM will set its fees in such a way that ensures the costs are apportioned fairly across the range of funds which it operates. The AFM reviews its fee model via various means, such as through external independent consultancy and market benchmarking reviews against similar firms in the market. The results of these reviews are incorporated into the AFM's governance arrangements, up to Board level.

Other notable, ancillary fees may include the depositary, custodian, and auditor fees. The AFM regularly reviews these fees compared to other funds operated by the AFM and, where the information is available, other funds within the wider marketplace, to ensure that they remain competitive.

Unitholders within the A unit classes are currently paying an AMC broadly in line with the market average for similar funds.

Unitholders within the B and C unit classes are currently paying an AMC lower than the market average for similar funds.

The AFM will discuss the level of the AMC with the Investment Manager at the next scheduled Investment Manager meeting, where applicable.

The AFM has concluded that unitholders are receiving good value, in relation to AFM Costs – General, overall.

Economies of Scale

The fund currently has assets under management (AUM) of less than £250m; this is the threshold above which, we generally consider it reasonable to consider if economies of scale have been passed on to investors.

The fund has a tiered depositary fee, subject to a minimum amount, alongside other fixed fees, such as audit fees. Therefore, as the fund AUM grows, the proportion of such costs, relative to overall fund size, will decline, in percentage terms.

Conclusion:



Green

The AFM has concluded that unitholders are receiving good value, in relation to Economies of Scale.

Comparable Market Rates

The current and historic Ongoing Charges Figure (OCF) for each unit class within the fund, together with the current, average OCF for the relevant, selected peer group, is shown within the table, below:

			Current			
On-Going Charges Figure (OCF)	2021	2022 Pee		Peer Rank		
Peer Group			1.05%	-		
A Net Accumulation GBP	1.32%	0.89%	0.96%	Lowest 49%		
A Net Income GBP	1.32%	0.89%	0.96%	Lowest 49%		
B Net Accumulation GBP	1.07%	0.64%	0.71%	Lowest 29%		
B Net Income GBP	1.07%	0.64%	0.71%	Lowest 29%		
C Net Accumulation GBP	0.57%	0.14%	0.21%	Lowest 10%		
A Net Accumulation USD	1.32%	0.89%	0.96%	Lowest 49%		
B Net Accumulation USD	1.07%	0.64%	0.71%	Lowest 29%		
C Net Accumulation USD	0.57%	0.14%	0.21%	Lowest 10%		
A Net Accumulation EUR	1.32%	0.89%	0.96%	Lowest 49%		

Source: Morningstar

Conclusion



Green

Unitholders are currently paying an OCF lower than the market average for similar funds.

The AFM has concluded that unitholders are receiving good value, in relation to Comparable Market Rates.

Comparable Services

Valu-Trac act as AFM for only one fund for which Price Value Partners Limited are the Investment Manager.

The services provided in respect to this fund are also aligned with the AFM's normal operating model.

Conclusion



Green

The AFM has concluded that unitholders are receiving good value, in relation to Comparable Services.

Classes of Units

	Current OCF	Difference Compared to Least Expensive	Difference Compared to Next Least Expensive	Minimum Lump Sum Investment	Minimum Subsequent Investment	Minimum Holding Amount
C Net Accumulation GBP	0.21%	-	-	£1,000	£1,000	£1,000
C Net Accumulation USD	0.21%	-	-	\$1,000	\$1,000	\$1,000
B Net Accumulation GBP	0.71%	0.50%	0.50%	£1,000,000	£0	£1,000,000
B Net Income GBP	0.71%	0.50%	0.50%	£1,000,000	£0	£1,000,000
B Net Accumulation USD	0.71%	0.50%	0.50%	\$1,000,000	\$0	\$1,000,000
A Net Accumulation GBP	0.96%	0.75%	0.25%	£1,000	£1,000	£1,000
A Net Income GBP	0.96%	0.75%	0.25%	£1,000	£1,000	£1,000
A Net Accumulation USD	0.96%	0.75%	0.25%	\$1,000	\$1,000	\$1,000
A Net Accumulation EUR	0.96%	0.75%	0.25%	€1,000	€1,000	€1,000

Where a share class may have a minimum investment or minimum holding amount, this may help the share class scale quicker, leading to a lower proportional servicing cost, and thus, lower Ongoing charges.

Conclusion



Green

The AFM notes that the C unit classes constitute founder share classes and are only available to investors at the discretion of the ACD or Investment Manager.

The AFM notes that the B unit classes come with more stringent investment minima than the A unit classes. The AFM also notes that the cost differential between both unit classes is below the relevant, assumed materiality threshold.

The AFM has concluded that unit holders are receiving good value in relation to Classes of Units.

Overall Assessment



Amber

The AFM has concluded that unitholders are receiving good value in respect to six of the seven, discrete criteria assessed above i.e. each has been assessed as green.

The AFM will continue to discuss the trend in long term performance and investment risk with the Investment Manager. The AFM will also investigate the drivers of long term performance and investment risk and will present any relevant findings to the Investment Manager, for their comment and consideration, at the next scheduled Investment Manager meeting.

With regard to AFM Costs – General, the AFM will discuss the level of the AMC with the Investment Manager at the next scheduled Investment Manager meeting, where applicable.

The AFM has concluded that the unitholders within the VT Price Value Portfolio are receiving reasonable value, overall.

27/03/2024