



Valu-Trac Investment Management Limited

Annual Assessment of Value Statement as at 31 December 2024

VT Gravis UK Infrastructure Income Fund

Fund Information

Investment Manager:	Valu-Trac Investment Management Limited (Valu-Trac)
Authorised Fund Manager:	Valu-Trac Investment Management Limited (Valu-Trac)
Investment Adviser:	Gravis Advisory Ltd
Investment Objective:	The investment objective of the VT Gravis UK Infrastructure Income Fund is to generate income and preserve capital with potential for capital growth
Investment Policy:	The sub-fund will aim to meet its objectives by investing primarily (at least 70%) in equities (which are mainly listed in the United Kingdom and whose primary activity is in the wider infrastructure sector of the United Kingdom). In addition to investing in equities, the sub-fund may also invest in other transferable securities, bonds, collective investment schemes, money market instruments, deposits, cash and near cash. The Fund will have a specific focus on investments denominated in Sterling, which are themselves invested in Sterling assets and which have most or all of their activities within the UK. Other than as noted in the policy there is no particular emphasis on any geographical area or industry or economic sector.
AUM (£):	£522.9m
Fund Launch Date:	25/01/2016

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 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 Gravis UK Infrastructure Income Fund	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
C Net Accumulation GBP	10.4%	● G	● R	● G	● G	● G	● G	● G	● A
C Net Income GBP	4.5%	● G	● R	● G	● G	● G	● G	● G	● A
I Net Accumulation GBP	49.6%	● G	● R	● G	● G	● G	● G	● G	● A
I Net Income GBP	35.4%	● G	● R	● G	● G	● G	● G	● G	● A
C Net Accumulation EUR (H)	0.0%	● G	● R	● G	● G	● G	● G	● G	● A
C Net Income EUR (H)	0.0%	● G	● R	● G	● G	● G	● G	● G	● A
C Net Accumulation USD (H)	0.0%	● G	● R	● G	● G	● G	● G	● G	● A
I Net Income EUR (H)	0.0%	● G	● R	● G	● G	● G	● G	● G	● A

The table below shows the overall summary for the previous assessment i.e. carried out as at 31 December 2023:

VT Gravis UK Infrastructure Income Fund	AUM (%)	Quality of Service	Performance	AFM costs - general	Economies of scale	Comparable market rates	Comparable services	Classes of units	Overall
Overall	100.0%	G	A	G	G	G	G	G	G
C Net Accumulation GBP	13.7%	G	A	G	G	G	G	G	G
C Net Income GBP	5.9%	G	A	G	G	G	G	G	G
I Net Accumulation GBP	49.2%	G	A	G	G	G	G	G	G
I Net Income GBP	30.9%	G	A	G	G	G	G	G	G
C Net Accumulation EUR (H)	0.1%	G	A	G	G	G	G	G	G
C Net Income EUR (H)	0.0%	G	A	G	G	G	G	G	G
C Net Accumulation USD (H)	0.0%	G	A	G	G	G	G	G	G
I Net Income EUR (H)	0.1%	G	R	G	G	G	G	G	A
I Net Accumulation USD (H)	0.1%	G	A	G	G	G	G	G	G

Previous Remedial Actions

- Performance
 - Assessed as Amber
 - The AFM will discuss the drivers of long-term performance and investment risk, and trends in long term performance and investment risk, with the Investment Manager, at the next scheduled Investment Manager meeting.

New Remedial Actions

- Performance
 - Assessed as Red
 - The AFM will continue to discuss the drivers of long-term performance and investment risk, and trends in long term performance and investment risk, with the Investment Manager.

Detailed Assessment

Quality of Service

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

- Investment Management services: Valu-Trac Investment Management Limited (Valu-Trac)
- Depositary services: NatWest Trustee and Depositary Services Limited
- Custodian services: CACEIS Investor Services
- 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 Gravis UK Infrastructure Income Fund is to generate income and preserve capital with potential for capital growth.

Constraining Benchmark:

none

Comparator Benchmark:

MSCI UK Index NR

Target Benchmark:

none

Peer Group:

IA Infrastructure Sector

Minimum Recommended Holding Period:

5 Years

Management Approach:

Active

The income generated (percentage yield) by each available share class within the fund, is shown below:

Yield	1 year to Dec-2024	1 year to Dec-2023	1 year to Dec-2022	1 year to Dec-2021	1 year to Dec-2020	5 years to Dec-2024 (avg. per-year)	Since Inception to Dec-2024 (avg. per-year)
C Net Accumulation GBP	5.9%	5.3%	4.4%	4.0%	4.5%	4.5%	-
C Net Income GBP	5.8%	5.2%	4.4%	4.0%	4.4%	4.0%	-
I Net Accumulation GBP	6.0%	5.4%	4.5%	4.1%	4.5%	4.5%	-
I Net Income GBP	5.8%	5.3%	4.5%	4.1%	4.5%	4.1%	-
C Net Accumulation EUR (H)	5.9%	5.3%	4.3%	4.1%	4.3%	4.4%	-
C Net Income EUR (H)	5.7%	5.2%	4.3%	4.0%	4.3%	3.9%	-
C Net Accumulation USD (H)	5.9%	5.2%	4.5%	3.9%	-	-	4.6%

Source: Valu-Trac

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. Please note that, for the € and \$ hedged unit classes, no directly appropriate comparator may be available. The performance of these unit classes, therefore, has been partly assessed in the context of the return(s) generated by the relevant, un-hedged unit class, after making a reasonable allowance for current hedging arrangements and for hedging costs.

Net Total Return*	1 year	3 years (avg. return per-year)	5 years (avg. return per-year)	5 years Peer Rank	Since Inception (avg. return per-year)	Since Inception Peer Rank
Benchmark	9.5%	8.1%	5.6%	-	-	-
C Net Accumulation GBP	-6.3%	-5.2%	-1.8%	Lowest 16%	-	-
C Net Income GBP	-6.4%	-5.2%	-1.8%	Lowest 15%	-	-
I Net Accumulation GBP	-6.3%	-5.1%	-1.7%	Lowest 17%	-	-
I Net Income GBP	-6.3%	-5.1%	-1.7%	Lowest 17%	-	-
Benchmark	-	-	-	-	-	-
C Net Accumulation EUR (H)	-7.7%	-6.6%	-2.8%	Lowest 6%	-	-
Benchmark	-	-	-	-	-	-
C Net Income EUR (H)	-7.7%	-6.7%	-2.9%	Lowest 5%	-	-

Benchmark	-	-	-	-	-	-
C Net Accumulation USD (H)	-6.0%	-4.6%	-	-	-0.9%	Lowest 16%

*To 31 December 2024

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: Morningstar / Valu-Trac

Performance of the C Net Accumulation EUR (H) unit class and C Net Income EUR (H) unit class is shown in EUR.

The C Net Accumulation USD (H) unit class was launched on 31 January 2020. Performance is shown in USD.

The I Net Income EUR (H) unit class was fully redeemed on 14 March 2024. This unit class was subsequently relaunched on 01 May 2024. As this unit class now no longer has a contiguous performance track record of >12 months, it has been excluded from any formal performance assessment.

Conclusion:



Red

Each unit class within the fund has successfully generated a positive yield, over the minimum recommended holding period or the longer term (since inception), where applicable.

The net total return of each unit class within the fund markedly is below that of its performance comparator benchmark, over the minimum recommended holding period or the longer term (since inception), where applicable.

The AFM has also assessed the investment risk within the Fund. The AFM notes that the realised volatility within the fund is typically lower than that of the performance comparator benchmark and of peers.

The AFM will continue to discuss the drivers of long-term performance and investment risk, and trends in long term performance and investment risk, with the Investment Manager.

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	
		Peer Rank
Peer Group	0.76%	-
C Net Accumulation GBP	0.75%	Lowest 49%
C Net Income GBP	0.75%	Lowest 49%
I Net Accumulation GBP	0.65%	Lowest 32%
I Net Income GBP	0.65%	Lowest 32%
C Net Accumulation EUR (H)	0.75%	Lowest 49%

C Net Income EUR (H)	0.75%	Lowest 49%
C Net Accumulation USD (H)	0.75%	Lowest 49%
I Net Income EUR (H)	0.65%	Lowest 32%

Source: Morningstar

Conclusion:

 Green

The Investment Management Fee and 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 are currently paying an AMC lower than the market average for similar funds.

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

Economies of Scale

The fund currently has assets under management (AUM) of more 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:

Ongoing Charges Figure (OCF)	2022	2023	Current	
				Peer Rank

Peer Group	-	-	0.92%	-
C Net Accumulation GBP	1.65%	0.75%	0.77%	Lowest 35%
C Net Income GBP	1.65%	0.75%	0.77%	Lowest 35%
I Net Accumulation GBP	1.55%	0.65%	0.67%	Lowest 27%
I Net Income GBP	1.55%	0.65%	0.67%	Lowest 27%
C Net Accumulation EUR (H)	1.65%	0.75%	0.77%	Lowest 35%
C Net Income EUR (H)	1.65%	0.75%	0.77%	Lowest 35%
C Net Accumulation USD (H)	1.65%	0.75%	0.77%	Lowest 35%
I Net Income EUR (H)	1.55%	0.65%	0.67%	Lowest 27%

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 five funds for which Gravis Advisory Limited are the Investment Advisor. Differences between funds, in terms of their investment objective, management approach anticipated risk profile, notwithstanding, this fund is priced consistently with other funds within the range.

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
I Net Accumulation GBP	0.67%	-	-	£5,000,000	£10,000	£5,000,000
I Net Income GBP	0.67%	-	-	£5,000,000	£10,000	£5,000,000
I Net Income EUR (H)	0.67%	-	-	€5,000,000	€10,000	€5,000,000
C Net Accumulation GBP	0.77%	0.10%	0.10%	£1,000	£500	£1,000
C Net Income GBP	0.77%	0.10%	0.10%	£1,000	£500	£1,000
C Net Accumulation EUR (H)	0.77%	0.10%	0.10%	€1,000	€500	€1,000

C Net Income EUR (H)	0.77%	0.10%	0.10%	€1,000	€500	€1,000
C Net Accumulation USD (H)	0.77%	0.10%	0.10%	\$1,000	\$500	\$1,000

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

Conclusion



Green

The I unit classes come with more stringent investment minima than the C unit classes. Given that the incremental difference in OCF between each unit class does not exceed the suggested materiality threshold, the AFM has concluded that unitholders within each of these unit classes are receiving good value, in relation to Classes of Units.

The AFM has concluded that unitholders 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.

With regard to Performance, the AFM will continue to discuss the drivers of long-term performance and investment risk, and trends in long term performance and investment risk, with the Investment Manager.

The AFM has concluded that the unitholders within the VT Gravis UK Infrastructure Income Fund are receiving reasonable value, overall.

23/04/2025