



Assessment of Value

WAY MA Portfolio Fund

Incorporating sub-fund

WAY MA Cautious Portfolio Fund

Period ending: 31st March 2024



WAY Fund Managers Limited & Brompton Asset Management Holdings Limited

WAY Fund Managers Limited (WFM), as the Authorised Fund Manager (AFM) offers an independent fund structuring and fund operation facility to regulated asset management professionals such as investment managers, wealth managers, IFAs, stockbroking firms and other financial institutions, who are looking to establish new, or maintain existing, regulated collective investment schemes in the UK.

WFM's flexible approach is built around a solid core operating model which allows it to adapt its service offering and level of interaction to meet the business needs of its professional clients and in turn, its mutual investors.

WFM, the AFM, and Brompton Asset Management Holdings Limited, the Sponsor, act as joint manufacturer to the WAY MA Portfolio Fund, and have appointed Brompton Asset Management Limited (Brompton) as investment adviser of the sub-fund WAY MA Cautious Portfolio Fund, hereinafter referred to as the 'sub-fund'.



Assessment of Value-an overview

The assessment of value (AoV) is undertaken annually by WFM to determine whether the payments taken for each class of shares or units of a fund or a sub-fund, are justified in the context of the overall service and value delivered to investors, taking into consideration regulation and guidance from the Financial Conduct Authority.

WFM's Product Governance Committee carries out the initial assessment of a fund/sub-fund taking into consideration the 'Value Factors' detailed below. This assessment is then passed to WFM's independent non-executive directors (iNEDs) for scrutiny and agreement, ensuring that the outcome reflects a clear and fair assessment. A final review is carried out by the WFM Board before publication.

Outcome of the Assessment



To provide a clear presentation of the value assessment outcomes in this report WFM have adopted the grading method that the industry uses for also sharing it with distributors and intermediaries. This is by using two outcomes and to make these outcomes easier to read at the end of this report you will find a table for each fund/sub-fund and unit/share class using the following ratings: -


	Charges are justified based on assessment and any action identified or, where the first assessment is not yet due, based on initial product design.
	Charges are not justified; significant action is required.


For each share or unit class, WFM uses a green (justified)/red (not justified) signal for each of the Value Factors, to indicate whether it believes the charges are justified in the context of the overall service and value delivered to investors.


Value factors that contribute to our assessment of value


WFM considers, but is not limited to considering, the following value factors for each class of units/shares within each fund or sub-fund:


	<p>The range of services provided to investors by the Sponsor</p>	<p>Brompton is a discretionary fund manager investing on behalf of clients via multi-asset funds of funds. Brompton aims to provide sound and sustainable returns by diversifying risk across a broad range of asset classes. As investment Manager, Brompton is responsible for the provision of investment management services to the Fund. Recognising that asset allocation plays a critical role in delivering healthy risk-adjusted returns, Brompton's investment team has developed a dynamic asset allocation approach. This combines determining the asset allocation to reflect the team's prevailing views on economic trends and market valuations with the selection of the best fund managers it can find and blending those managers into a portfolio that meets investors' needs.</p> <p>To support investors, Brompton provides monthly fund factsheets and quarterly marketing updates, both of which are available via the Brompton website, and commentaries for annual and half-yearly reports. The investment team may also give briefings and presentations to advisers and investors.</p> <p>Brompton has experienced staff in risk, product development, operations and compliance, supporting the investment management team.</p>
	<p>Investor Service & Fund Governance from the AFM</p>	<p>As the AFM, WFM is responsible for overseeing any third-party that provides services to its funds/sub-funds. Being based in Wimborne, Dorset allows WFM's operating costs to typically be lower than a London-based organisation and, as a smaller business, WFM has built strong relationships with its third-party service providers. This allows WFM to nimbly exchange expertise and business development ideas for the benefit of investors and to provide a good quality personal service. The Wimborne-based Transfer Agency was originally developed by WFM specifically for its own funds/sub-funds and that close relationship continues, with a dedicated team all experienced in the understanding of the full WFM fund range and typical investor requirements. The Wimborne office also provides in-house corporate governance and oversight expertise in investment, product, compliance, risk, and other operational arrangements.</p>


	<p>Comparable Services</p>	<p>WFM provides a similar range of services across its entire fund range. This means WFM adheres to all applicable financial regulations in the UK and provides the information and dealing services that its investors need. WFM's added value is its customer service and WFM prides itself on high quality personal service compared to other institutions. Charging structures may vary between funds/sub-funds, because the size, investment nature and risk can vary between different funds/sub-funds, depending on its investment objective(s) and policy. However, WFM endeavours to ensure that the ongoing fees paid by a fund/sub-fund are similar to those paid by other comparable funds/sub-funds in its range. Unit/Shareholders can compare the charges across WFM's fund range at: https://www.wayfunds.com/Funds/FundChargesandCosts</p>
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	<p>Economies of Scale</p>	<p>WFM has used its overall asset base to negotiate the best possible terms available with its current outsourced service providers, for the benefit of its entire fund range. Service arrangements are reviewed on an ongoing basis and WFM negotiates fee rates on an appropriate sliding scale, with lower percentage fees applying as the funds/sub-funds reach certain sizes, ensuring all benefits of economies of scale are applied directly to the funds/sub-funds and their investors. This means that as a fund/sub-fund grows, it benefits from the improved economies of scale. Certain services may have fixed or minimum fees, which are applied to each individual fund/sub-fund. WFM seeks to ensure that each fund/sub-fund offers value to investors and is viable considering the impact of any fixed or minimum fees.</p>
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	<p>Performance of a fund/ sub-fund</p>	<p>WFM assesses the value represented by the investment performance achieved by a fund/sub-fund after charges, at the end of each annual review period, taking into consideration the sub-fund's investment objective(s), its policy, its benchmark, its recommended holding period and, where relevant, its relative exposure to investment risk to achieve this.</p>
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	<p>The Cost of Investing</p>	<p>All expenses and general disbursements paid by a fund/sub-fund, such as the annual management charge, the cost of any investment advisory services, regulatory reporting, accounting, transfer agency, platform services, depository and custody services, together with the synthetic cost arising where investment is made into any underlying funds are reflected in the ongoing charges figure ("OCF"). The cost of investing may be different depending upon the share or unit class selected.</p>
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	<p>Classes of shares or units available</p>	<p>Each fund/sub-fund may have a number of unit/share classes, each with different characteristics and charging structures, to cater for the ways in which they may have been previously, or are currently, offered and are determined by the fund's/sub-fund's Sponsor. The selection of the appropriate unit/share class is made by investors or their financial advisers. During this assessment WFM will review each of the unit/share classes across a fund/sub-fund to ensure, as far as WFM reasonably can, that unit/shareholders are in the correct unit/share class given the size of their holding. However, WFM is unable to determine whether one unit/share class is more suitable for an individual investor than another. A table setting out the characteristics of each unit/share class is provided later in this report.</p>
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	<p>Comparable Market Rates</p>	<p>Given the confidential nature of commercial arrangements, it is not possible to objectively compare the rates that WFM is paying for its services against its competitors. As described above not all unit/share classes can be comparable to each other across different funds/sub-funds. However, all funds/sub-funds have a "primary" unit/share class registered with the Investment Association. WFM has, therefore, used the primary unit/share class in its assessment. Using data supplied to FE Analytics by AFMs for publication, WFM can compare funds/sub-funds of a similar size, structure and Investment Association Sector for an average investment cost. It should be noted that this section is based on the total charges incurred and includes the asset transaction costs charged to the fund/sub-fund, which are not included in the OCF calculation.</p>
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WAY MA Cautious Portfolio Fund

The objective of the sub-fund is to seek capital growth.

Share Class	ISIN	Share Class Rating	AFM Investor Service & Governance	Comparable Services	Economies of Scale	Performance of the sub-fund	Cost of Investing	Share classes Available	Comparable Market Rates
B Accumulation	GB00B39TFG94	●	●	●	●	●	●	●	●
B Income	GB00B39TFD63	●	●	●	●	●	●	●	●
C Income	GB00BQNKFK38	●	●	●	●	●	●	●	●
E Accumulation	GB00B87X8G93	●	●	●	●	●	●	●	●
E Income	GB00B8JGQM80	●	●	●	●	●	●	●	●
S Income	GB00BGH13Q46	●	●	●	●	●	●	●	●
T Income	GB00B8YPMQ64	●	●	●	●	●	●	●	●

Summary of Grading:

All share classes have been assessed and graded ●. Charges are justified based on assessment and any action identified.

The sub-fund has met its object to provide capital growth via its investment strategy. However, when comparing the individual unit class charging structures against the sub-fund's IA Sector peer group for funds of a similar size and structure, the OCF is higher. This has been accepted as reasonable as each unit class has been designed for a particular purpose and provides different services to unitholders. This is described in the Share/Unit classes section below.

Performance

The sub-fund has met its objective to provide capital growth. The sub-fund has had positive growth over the recommended five-year holding period and is providing value to investors across all share classes. WFM recognises the relative underperformance of the legacy B classes when compared to the other share classes and attributes this to the higher OCF arising from the remuneration that is paid to intermediaries.

Share Class	Since Launch	5 Year	3 Year	1 Year
IA Mixed Investment 20-60% Shares sector	89.01%	17.16%	5.34%	7.71%
B Accumulation	84.67%	21.73%	4.16%	7.50%
B Income	84.47%	21.72%	4.16%	7.51%
C Income*	12.96%			8.48%
E Accumulation	96.13%	24.81%	5.73%	8.04%
E Income	96.12%	24.83%	5.74%	8.06%
S Income	95.49%	24.81%	5.73%	8.05%
T Income	91.91%	22.94%	4.78%	7.72%

* The C Income class was introduced in November 2022

Classes of shares

WFM endeavours to ensure that all shareholders are in the most appropriate share classes. However, the selection of share class is driven by the investor's choice, the intermediary used and the distribution channel.

Share Class	Distribution Channel
B Accumulation	These share classes are pre-RDR (Retail Distribution Review) investments arranged before 31/12/2012 (or in respect of an investment made after this date for which no financial advice has been given to the investor) and include a commission that is paid to the financial intermediary. They are no longer available for new advised investments.
B Income	
C Income	The C Income class was introduced in November 2022. This is an unbundled unit class only available for new WAY Trustees Limited (WTL) (trust-based inheritance tax mitigation plan) investors paying trust fees directly to WTL.
E Accumulation	E Accumulation is the Primary Retail Share Class. These are unbundled classes open to all investors

E Income	
S Income*	This is an unbundled share class only available to existing WAY Trustees Limited (WTL) (trust-based inheritance tax mitigation plan) investors who invested before 01/07/2017. This includes additional charges for the services provided by WTL as agreed with investors and their intermediaries and is not available to new investors
T Income*	This is an unbundled share class only available to existing WAY Trustees Limited (WTL) (trust-based inheritance tax mitigation plan) investors. This includes additional charges for the services provided by WTL as agreed with investors and their intermediaries and is not available to new investors

* Over a number of years, the sub-fund's Income classes have been available exclusively to investors investing via flexible trust-based inheritance tax planning solutions and trust services (IHT Trusts). The IHT Trust-related charges are included in the sub-fund's charges. These charges cover the additional costs associated with the day-to-day administration and ongoing trust licensing incurred for providing the IHT Trusts. As the additional services do not relate to investment in the sub-fund, but to the IHT Trust services (i.e. they are not retained by WFM), WFM does not express any views as to whether the additional services themselves offer reasonable value for money.

The Cost of Investing

WFM considers all value factors during the sub-fund's annual review when assessing whether the costs are justified. Compared to the costs in the 2023 assessment of value, the sub-fund has seen a 1% reduction across all share classes in the ongoing charges as well as a reduction in the other expenses charged to investors. WFM has, therefore, determined the overall cost of investing is justified, as it reflects the services provided and that the sub-fund is, providing value to investors. Please note, this assessment is based on the Fund's position over the 12-month period to the accounting reference date of 31st March 2024. The cost of investing will change as the Fund's underlying assets are bought and sold. Therefore, these costs can increase or decrease accordingly during the next and any period and will be reflected in the next assessment.

Comparable Market Rates

WFM has compared the charges associated with the sub-fund's primary share class (the E class) with that of other 'Fund of Funds' with a similar size within the sub-fund's peer group, the Investment Association (IA) Mixed Investment 20-60% Shares sector, and the overall cost of investing in the sub-fund's primary unit class is higher. WFM has, therefore, determined that the sub-fund does not compare favourably when compared to its peer group of funds.

Quality of Service

A good level of service is provided to shareholders by all parties involved, which is commensurate to the amounts paid by the sub-fund for those services. Therefore, WFM has determined that value has been provided to the sub-fund's investors.

Comparable Services

All investors are provided with the same services by WFM, and the sub-fund has the same direct service providers as the whole WFM Fund range.

Economies of Scale

All available savings from economies of scale obtained by WFM or the sub-fund are passed to the sub-fund's investors.