



**WAY Fund Managers**

## Assessment of Value

WAY Flexible Global Growth  
Portfolio Fund

Period ending: 31<sup>st</sup> March 2025



**BROMPTON**  
ASSET MANAGEMENT



## **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, which 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 manufacturers to the WAY Flexible Global Growth Portfolio Fund (the 'Fund'), and have appointed Brompton Asset Management Limited (Brompton) as investment manager of the 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 units of a 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, 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 has adopted the grading method that the industry uses for sharing with distributors and intermediaries. This is by using two outcomes, and to make these outcomes easier to understand, on page 6 of this report you will find a table for the Fund and unit classes using the below 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 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 within the Fund:

|  |   |  |
|--|---|--|
|   | <p><b>The range of services provided to investors by the Investment Manager</b></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 the 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 that reflects 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 market updates, both of which are available via the Brompton website (<a href="http://www.bromptonam.com">www.bromptonam.com</a>), 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><b>Investor Service &amp; Fund Governance from the AFM</b></p>                   | <p>As the AFM, WFM is responsible for overseeing any third-party that provides services to its 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 range 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><b>Comparable Services</b></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, because the size, investment nature and risk can vary between different funds, depending on its investment objective(s) and policy. However, WFM endeavours to ensure that the ongoing fees paid by a fund are similar to those paid by other comparable funds in its range. Unitholders can compare the charges across WFM's fund range at: <a href="https://www.wayfunds.com/Funds/FundChargesandCosts">https://www.wayfunds.com/Funds/FundChargesandCosts</a></p> |
|   | <p><b>Economies of Scale</b></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 reach certain sizes, ensuring all benefits of economies of scale are applied directly to the funds and their investors. This means that as a 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. WFM seeks to ensure that each fund offers value to investors and is viable considering the impact of any fixed or minimum fees.</p>  |
|  | <p><b>Performance of a fund/ sub-fund</b></p> | <p>WFM assesses the value represented by the investment performance achieved by a fund after charges, at the end of each annual review period, taking into consideration the 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>   |

|  |  |  |
|--|--|--|
|   | <p><b>The Cost of Investing</b></p>                | <p>All expenses and general disbursements paid by a fund, such as the annual management charge, the cost of any investment advisory services, regulatory reporting, accounting, transfer agency, platform services, depositary 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 unit class selected.</p>   |
|   | <p><b>Classes of shares or units available</b></p> | <p>Each fund may have a number of unit 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 Sponsor. The selection of the appropriate unit class is made by investors or their financial advisers. During this assessment WFM will review each of the unit classes across a fund to ensure, as far as WFM reasonably can, that unitholders are in the correct unit class given the size of their holding. However, WFM is unable to determine whether one unit class is more suitable for an individual investor than another. A table setting out the characteristics of each unit class is provided later in this report.</p>  |
|  | <p><b>Comparable Market Rates</b></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 classes can be comparable to each other across different funds. However, all funds have a "primary" unit class registered with the Investment Association. WFM has, therefore, used the primary unit class in its assessment. Using data supplied to FE Analytics by AFMs for publication, WFM can compare 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, which are not included in the OCF calculation.</p> |

# WAY Flexible Global Growth Portfolio Fund

The objective of the Fund is to provide maximum capital growth.

| Unit Class     | ISIN         | Unit Class Rating | AFM Investor Service & Governance | Comparable Services | Economies of Scale | Performance of the Fund | Cost of Investing | Unit classes Available | Comparable Market Rates |
|----------------|--------------|-------------------|-----------------------------------|---------------------|--------------------|-------------------------|-------------------|------------------------|-------------------------|
| A Accumulation | GB0006989007 | ●                 | ●                                 | ●                   | ●                  | ●                       | ●                 | ●                      | ●                       |
| A Income       | GB0034312875 | ●                 | ●                                 | ●                   | ●                  | ●                       | ●                 | ●                      | ●                       |
| C Income       | GB00BQNKFH09 | ●                 | ●                                 | ●                   | ●                  | ●                       | ●                 | ●                      | ●                       |
| E Accumulation | GB00B96VT465 | ●                 | ●                                 | ●                   | ●                  | ●                       | ●                 | ●                      | ●                       |
| E Income       | GB00B970YR05 | ●                 | ●                                 | ●                   | ●                  | ●                       | ●                 | ●                      | ●                       |
| S Income       | GB00BGH13N15 | ●                 | ●                                 | ●                   | ●                  | ●                       | ●                 | ●                      | ●                       |
| T Income       | GB00B99K1J99 | ●                 | ●                                 | ●                   | ●                  | ●                       | ●                 | ●                      | ●                       |

## Summary of Grading:

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

The Fund has met its objective to provide maximum capital growth over the recommended holding period. However, when comparing the individual unit class charging structure against the Fund's peer group, the ongoing charges are higher. Despite this, WFM has accepted the charges as reasonable because each unit class has been designed for a particular purpose and provides different services to unitholders. Please see the Classes of Units section on pages 7 and 8 for further details.

## Performance

The Fund has met its objective to provide maximum capital growth over the recommended five-year holding period and, therefore, WFM has determined that the Fund is providing value to investors across all unit classes.

| Unit Class                            | Since Launch | 5 Years | 3 Years | 1 Year |
|---------------------------------------|--------------|---------|---------|--------|
| IA Flexible Investment sector average | 694.29%      | 47.32%  | 8.73%   | 2.92%  |
| A Accumulation                        | 446.18%      | 43.28%  | 4.91%   | 1.25%  |
| A Income                              | 446.12%      | 43.26%  | 4.89%   | 1.25%  |
| C Income*                             | 19.84%       |         |         | 2.64%  |
| E Accumulation                        | 520.55%      | 50.62%  | 8.09%   | 2.27%  |
| E Income                              | 520.52%      | 50.62%  | 8.09%   | 2.27%  |
| S Income                              | 503.34%      | 48.74%  | 7.28%   | 2.01%  |
| T Income                              | 492.48%      | 48.37%  | 7.12%   | 1.96%  |

*\*The C Income class was introduced in November 2022.*

## Classes of Units

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

| Unit Class     | Distribution Channel   |
|----------------|--|
| A Accumulation | These unit 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 an ongoing commission that is paid to the investor's financial intermediary. They are not available for new advised investments. |
| A Income       |  |
| C Income       | The C Income class was introduced in November 2022. This is an unbundled unit class only available for new investors in the trust-based inheritance tax mitigation plans promoted by WAY Trustees Limited (WTL). Investors in this class through the trust-based inheritance tax mitigation plans pay separate trust-related fees directly to WTL.                 |

|                |  |
|----------------|--|
| E Accumulation | E Accumulation is the primary retail unit class. These are unbundled classes open to all investors.  |
| E Income       |  |
| S Income*      | This is an unbundled unit class only available to existing investors in the trust-based inheritance tax mitigation plans promoted by WAY Trustees Limited (WTL) 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 unit class only available to existing investors in the trust-based inheritance tax mitigation plans promoted by WAY Trustees Limited (WTL). 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 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 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 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 Fund's annual review when assessing whether the costs are justified. Compared to the costs in the 2024 Assessment of Value, the Fund has seen a reduction between 5% and 9% in ongoing charges across all unit classes. WFM has determined that the overall cost of investing is justified as it reflects the services provided and that the Fund is, therefore, 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 31<sup>st</sup> March 2025. 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 accounting period and will be reflected in the next assessment.*

### **Comparable Market Rates**

*WFM has compared the charges associated with the Fund's primary unit class (the E class) with that of other 'Fund of Funds' with a similar size within the Fund's peer group, the Investment Association (IA) Flexible Investment Sector, and the overall cost of investing in the Fund's primary unit class is higher. WFM has, therefore, determined that the Fund does not compare favourably to its peer group of funds.*

### **Quality of Service**

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

### **Comparable Services**

*All investors are provided with the same services by WFM, and the 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 Fund are passed to the Fund's investors.*