



WAY Fund Managers

Assessment of Value

WAY Momentum Portfolio

Incorporating sub-fund:

WAY Global Momentum Fund

Period ending: 28th February 2025



WM Capital Management



WAY Fund Managers Limited & WM Capital Management 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, as AFM to the WAY Momentum Portfolio, acts with WM Capital Management Limited, the Sponsor and appointed investment manager of the WAY Global Momentum Fund (hereinafter referred to individually as the 'sub-fund'), as joint manufacturer.

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 of 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 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, 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 sub-fund and share 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 share 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 shares within each fund or sub-fund:

	The range of services provided to investors by the Sponsor	The role of the Sponsor is to act as the joint manufacturer of the sub-fund and to provide input to WFM in relation to marketing opportunities it may have identified and to suggest any changes relating to a sub-fund's investment objective and investment policy to broaden its appeal to investors. The Sponsor and WFM will jointly appoint an Investment Manager and confirm the investment strategy for each sub-fund.
	Investor Service & Fund Governance from the AFM	As the AFM, WFM is responsible for overseeing any third-party that provides services to its 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 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.

	Comparable Services	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 sub-funds, because the size, investment nature and risk can vary between different sub-funds, depending on its investment objective(s) and policy. However, WFM endeavours to ensure that the ongoing fees paid by a sub-fund are similar to those paid by other comparable sub-funds in its range. Shareholders can compare the charges across WFM's fund range at: https://www.wayfunds.com/Funds/FundChargesandCosts
	Economies of Scale	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 sub-funds reach certain sizes, ensuring all benefits of economies of scale are applied directly to the sub-funds and their investors. This means that as a 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 sub-fund. WFM seeks to ensure that each sub-fund offers value to investors and is viable considering the impact of any fixed or minimum fees.
	Performance of a sub-fund	WFM assesses the value represented by the investment performance achieved by a 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.
	The Cost of Investing	All expenses and general disbursements paid by a sub-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 share class selected.

	Classes of shares or units available	Each sub-fund may have a number of 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 sub-fund's Sponsor. The selection of the appropriate share class is made by investors or their financial advisers. During this assessment WFM will review each of the share classes across a sub-fund to ensure, as far as WFM reasonably can, that shareholders are in the correct share class given the size of their holding. However, WFM is unable to determine whether one share class is more suitable for an individual investor than another. A table setting out the characteristics of each share class is provided later in this report.
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	Comparable Market Rates	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 share classes can be comparable to each other across different sub-funds. However, all sub-funds have a "primary" share class registered with the Investment Association. WFM has, therefore, used the primary share class in its assessment. Using data supplied to FE Analytics by AFMs for publication, WFM can compare 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 sub-fund, which are not included in the OCF calculation.
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WM Capital Management

WAY Global Momentum Fund

The objective of the sub-fund is to achieve long-term capital growth by using a systematic and low-cost approach to gain exposure to a range of developed global equity markets via investing in and regular rebalancing of exchange traded funds (or similar instruments).

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
A Accumulation	GB00B6065718	●	●	●	●	●	●	●	●
A Income	GB00B62SHJ17	●	●	●	●	●	●	●	●
B Accumulation	GB00B62Y3X56	●	●	●	●	●	●	●	●
C Accumulation	GB00B3Q2CZ99	●	●	●	●	●	●	●	●
C Income	GB00B63MVK11	●	●	●	●	●	●	●	●
D Accumulation	GB00B63N0B80	●	●	●	●	●	●	●	●
D Income	GB00B64Q7V56	●	●	●	●	●	●	●	●
E Accumulation	GB00B57W7682	●	●	●	●	●	●	●	●
E Income	GB00B8XD0909	●	●	●	●	●	●	●	●
S Income	GB00BG1QH633	●	●	●	●	●	●	●	●
T Income	GB00B99LHB68	●	●	●	●	●	●	●	●

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

Action being taken following the assessment:

Despite the sub-fund's positive grading, the sub-fund was receiving limited new investment and was decreasing in value and had become too small to remain viable. The sub-fund's investors approved its merger with the larger EF WM Global Trend Fund, which has a similar investment objective and strategy, and the merger was completed on the 16th May 2025. Documentation relating to the EF WM Global Trend Fund can be found here: www.wayfunds.com/Sponsors/WMCapitalManagementLimited.

Performance

WFM acknowledges that the sub-fund underperformed against its comparator benchmark, the UK Consumer Prices Index (CPI) +2%. However, WFM has determined that the sub-fund has met its long-term objective to achieve capital growth over the recommended five-year holding period.

Share Class	Since Launch	5 Year	3 Year	1 Year
UK Consumer Prices Index (CPI) +2%	95.05%	38.26%	24.63%	4.85%
A Accumulation	28.10%	9.11%	-0.34%	7.53%
A Income	28.10%	9.12%	-0.33%	7.54%
B Accumulation	42.21%	13.28%	1.93%	8.33%
C Accumulation	28.09%	9.11%	-0.36%	7.53%
C Income	28.09%	9.11%	-0.35%	7.52%
D Accumulation	42.67%	13.30%	1.93%	8.34%
D Income	38.01%	13.26%	1.89%	8.30%
E Accumulation	37.87%	12.45%	1.47%	8.18%
E Income	40.84%	14.54%	3.37%	10.20%
S Income	40.11%	11.87%	1.16%	8.07%
T Income	31.74%	10.20%	0.25%	7.74%

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
A Accumulation & A Income	Legacy retail class with higher cost than other classes because it includes a trail commission which is agreed with the individual investor and their financial intermediary. A Income shares are only available for investment by inheritance tax mitigation products promoted by WAY Trustees Limited.
B Accumulation	Lower costs than other classes, as designed for institutional investors with higher investment requirements. Unavailable on platforms.
C Accumulation & C Income	Retail classes with adviser trail commission for WAY inheritance tax products. C Income shares are only available for investment by inheritance tax mitigation products promoted by WAY Trustees Limited.
D Accumulation & D Income	Lower costs than other classes as designed for institutional investors with higher investment requirements. Unavailable on platforms. D Income shares are only available for investment by inheritance tax mitigation products promoted by WAY Trustees Limited.
E Accumulation & E Income	Competitive with its market peers in terms of charges and is the primary retail share class for new investors. Available on all platforms. E Income shares are only available for investment by inheritance tax mitigation products promoted by WAY Trustees Limited.
S Income	Designed for WAY Trustees Limited (WTL) investors only and carries additional charges for the services provided by WTL as agreed with the investors.
T Income	Designed for WAY Trustees Limited (WTL) investors only and carries additional charges for the services provided by WTL as agreed with the investors.

The Cost of Investing

WFM considered both the performance return and the above information during its assessment. In relation to this section of the review, WFM has assessed that the sub-fund is providing value to investors.

Comparable Market Rates

WFM has compared the charges of the sub-fund's primary share class with that of comparable funds with a similar size and structure. The sub-fund's current charges were determined by WFM to be competitive with its peers and, therefore, delivering value to investors.

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.