



Product Governance

This Mole Valley Asset Management Ltd (MVAM) Product Governance policy is written, recognising that MVAM is both a manufacturer and distributor of its portfolio management services, and follows guidelines as specified in the FCA PROD Sourcebook.

For the purposes of this document, the 'product' we refer to here is a portfolio of equity shares, investment trusts, fixed income bonds and cash, collated on behalf of each client, which is unique to them, 'manufactured' to take into consideration all factors (risk appetite, time horizon, purpose of investment, affordable loss profile, etc) as assessed during the 'know your client' process.

'Distribution' of the portfolio is mainly direct to a retail client by way of the MVAM Investment Manager but may also be via a select number of independent financial advisers (IFAs), with whom MVAM has established a relationship and has shared the 'Target Market Information' documentation. In this instance, the IFA retains the relationship with the retail client, and selects a 'product' based upon their knowledge of both their client and the MVAM product offering.

This document is written, and will be reviewed, by the Compliance Manager, who has the compliance oversight function. It has been approved by the MVAM Board of Directors, and all subsequent updates will be reviewed and agreed by the same, prior to further publication.

MVAM offering

- MVAM are active, discretionary investment managers
- Offer restricted advice, on MVAM investment product range only
- Offer a range of risk levels for the manufactured portfolios – Cautious, Low, Moderate, Adventurous and High Risk
- Invest mainly in listed equities, but also some government and corporate bonds and Investment Trusts, listed in UK and European markets

Please see the document 'Target Market Information' matrix, published on the www.mvam.com website for a detailed description of the portfolio products and their associated risk levels, as well as a description of who they are, and are not, suitable for.

Clients

MVAM is authorised to service both retail and professional clients although the bias of the business model towards retail clients is likely to remain for the foreseeable future.

- Retail & professional clients
- Individual and joint portfolios
- Small company clients
- Family Trusts

- Looking to invest for the medium to long term – generally at least 2-5 years
- Each portfolio is discreet and unique, not shares in funds

Products

- General Investment Accounts
- ISAs, JISAs & LISAs for tax efficient saving
- SIPPs and SSASs for pension savings
- Inheritance Tax Portfolios

Suitability

As a manufacturer and distributor of the product of portfolio management, MVAM undertake a detailed process of getting to know and understand each client, to understand the reason for wanting to invest in our product, the amount to be invested, overall wealth, time horizon for the investment, attitude to risk and ability to bear loss, any requirement for income.

Using this information, the suitable and appropriate product and risk level can be assigned, in order that the selection of equity purchased forms a portfolio to perform in line with expectations.

All portfolios are kept under close review and maintained within the agreed limits of number and type of stocks held and risk levels, including any ethical preferences.

Distribution

- Investment Manager meets with the client to get to know them and builds a portfolio based upon the information gathered at a face-to-face meeting
- Recommendation by known associates of MVAM, both existing clients, and friends and family of staff
- IFA introduction – MVAM have relationships with a small number of independent financial advisers who may recommend our services to their existing clients. MVAM share their 'Target Market Information' with the IFA, who retains responsibility for knowing their client and selecting the appropriate portfolio make-up for the client. Any distributors used by MVAM are authorised and regulated by the FCA, and must carry out their own due diligence on MVAM and the range of products offered, in order to assess suitability for their retail clients, and provide MVAM with information about their distribution of our services
- Local advertising through sponsorship of a girls' youth rugby team, and in select local publications from time to time

Scenario Analysis

Value at risk (VaR) used to determine expected performance. The VaR is a statistical technique used to measure and quantify the level of financial risk within a portfolio over a specific time period. This is monitored by the compliance department regularly to ensure that each portfolio continues to perform within the parameters expected and advised to the client, with adjustments made if necessary.

Bloomberg stress testing when required, whereby the CF10, Portfolio Manager or the Board can look at a portfolio in a stress-test scenario to establish the likely outcome of various market conditions, to ensure that it would behave as expected, with adjustments made if necessary.

How We Manage Your Money

MVAM have produced a document which sets out exactly how we go about the management of a portfolio. This is available on request.

It details attitude to risk, returns expectations, capacity for loss (affordable loss limits), risk categorisation, how we measure risk (using VAR – Value at Risk), portfolio options and how we keep in touch with our clients.

Each client can expect an individual performance, as each portfolio is unique.

Charging Structure

Annual management charged as a percentage of funds under management, payable semi-annually

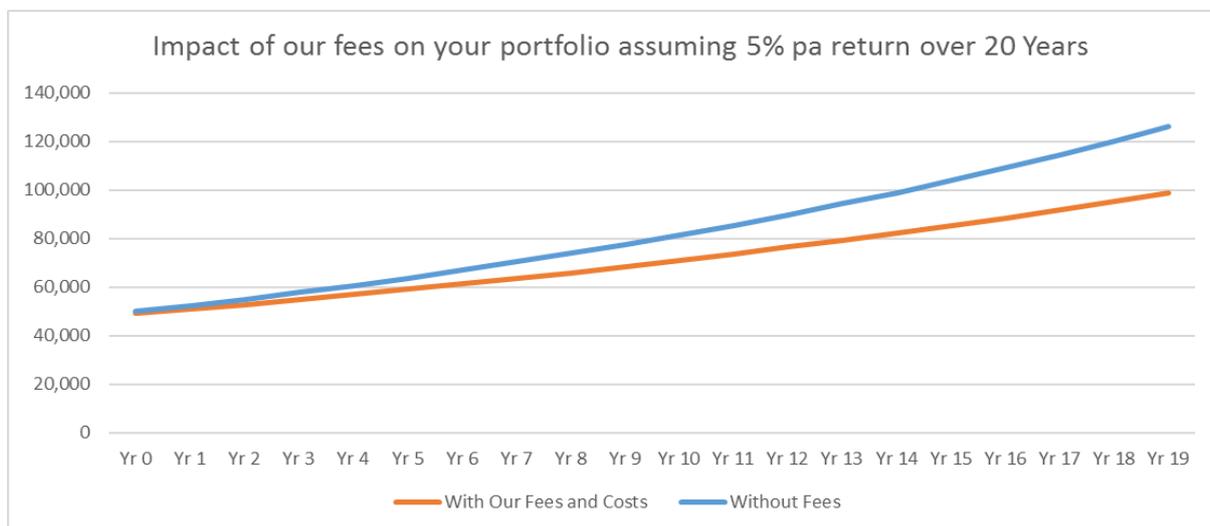
Performance fee of 15% after a hurdle rate of 5% is achieved

Admin and Dealing Fees on each trade, plus any statutory taxes such as Stamp Duty, but no entry or exit fees at portfolio set-up or closure

All details can be found in our Fair Fees document posted in the Products section of our website www.mvam.com

Taking these fees into consideration, we show below both the expected start-up costs in a table and the impact of expected fees and costs for the life of an investment made at MVAM. There are no other fees as we do not charge for advice and we do not have funds with any other charges.

Estimated Costs of Fund Set Up and Dissolution										
Set out below are the expected costs of setting up your fund and the costs of redeeming it. We do not charge any fees for setting up or closing a portfolio however there are dealing costs that are associated with the normal buying and selling the shares that will be taken when setting up or dissolving your portfolio. We have estimated these costs below. As our fees have some fixed elements, £5 admin fee and £20 minimum trade cost, the estimated cost of fund set up and dissolution varies slightly by the amount of money invested. The two tables below are costs as a % of portfolio invested with MVAM.										
Cost of Set Up (£)					Cost of Redemption Set Up (£)					
Bid offer Spread	Stamp Duty	Our Dealing Fees	Total	%	Bid offer Spread	Our Dealing Fees	Total	%		
50000	250	175	375	800	1.60%	50000	250	375	625	1.25%
100000	500	350	500	1350	1.35%	100000	500	500	1000	1.00%
250000	1250	875	875	3000	1.20%	250000	1250	875	2125	0.85%
1000000	5000	3500	3150	11650	1.17%	1000000	5000	3125	8125	0.81%
Assumes 15 holdings in £50,000 portfolio, 20 in 100000, 25 in 250000 and 30 in 1000000										
Assumes stamp duty on 70% of purchases and an average 0.5% bid offer spread.										
If your portfolio is entirely made up of small stocks the bid offer spread may be larger										



Client Outcomes

MVAM adhere to the FCA prescribed client outcomes and the description of how each point is addressed is found in our 'TCF – Treating Clients Fairly, Client Outcomes' document – that is available on request.

Outcome 1

Consumers can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture. Treating customers fairly is central to the core values of MVAM and our client relationships are built on this. All of our organisational processes and communications have been geared to plain speaking, transparency, suitability and the management of expectations to ensure there are no adverse surprises for our clients.

Outcome 2

Products and services marketed and sold in the retail market are designed to meet the needs of identified consumer groups and are targeted accordingly. Clients can be confident that they can clearly see projected costs, performance and potential pitfalls of their investments. The KYC process sets the foundation for the client to be confident that their portfolio is tailored to their requirements.

Outcome 3

Consumers are provided with clear information and kept appropriately informed before, during and after the point of sale. Informing clients of how their portfolio is doing is a crucial part of our philosophy and we do so by sending a monthly newsletter with portfolio valuation and performance. In addition, the Investor Portal is available 24 hours per day, meaning that clients can access their portfolios when it suits them.

Outcome 4

Where consumers receive advice, the advice is suitable and takes account of their circumstances. A Risk Fee Suitability report is generated at inception and is reviewed by each client annually, setting out the goals of the investment, specifying the number of stocks to be held in the portfolio, and clarifying affordable loss limits.

Outcome 5

Consumers are provided with products that perform as MVAM have led them to expect and the associated service is of an acceptable standard and as they have been led to expect. MVAM use Value at Risk (VAR) to estimate the chances of the portfolio falling by prescribed percentages, and benchmarks are used for comparison, to demonstrate over or under performance.

Outcome 6

Consumers do not face unreasonable post-sale barriers imposed by firms to change product, switch provider, submit a claim or make a complaint. There are no charges for withdrawing funds or switching to another provider, over and above trading charges, and there is a published complaints procedure available on the MVAM website, although we would hope to resolve any issues our clients may have before the need to raise a complaint.

Research

MVAM pays for investment research out of the firms operational account and does not add research costs to client fees.

With the payment for research becoming obligatory from 2018 MVAM reviewed over 20 brokers, their services and costs. From these offers MVAM has relationships with between 8 -12 broking houses at any time. Given the size of MVAM's Funds Under Management it is clear that the value of the research to MVAM and its clients does not equal the same value to that of a larger investment house due to the quantum difference in money returns that a larger house can achieve by following the same set of recommendations. Therefore, MVAM has opted for a

relatively low touch service to ensure that it achieves broad coverage of its UK and European stock universe, in the knowledge that it has the capabilities inhouse to research individual companies from any sector or geography.

MVAM does not rely on third party research alone, as it has an experienced team that is capable of doing their own research, visiting companies and modelling outcomes and thus, the importance of third party research is down to understanding where the market stands, rather than the analysis of the individual companies.

Client Reporting

Monthly Online Report - valuation, full breakdown of trades and costs plus performance for the year and since inception, and a brief performance comment are sent to each clients' portal. This is more regular than the quarterly regulatory requirement

Semi-Annual Hardcopy Report - contains a full breakdown of trading, valuation and performance

Risk Fee Suitability Report - sent annually restating aims of the investment, assumptions made, risks taken, affordable loss limits, and client suitability for the investment risks being taken

10% valuation fall – notification goes to any client whose portfolio has suffered a 10% or more fall in value since the last time the valuation was reported to the client. This would generally be the valuation from the monthly report

CGT report for capital gains tax information to assist a client with completing a tax return

CTC report for dividends and coupons received, to assist with completing a tax return

Investor Portal access for each client, where their portfolio valuation, performance and trading activity is available 24 hours per day, whenever the client wishes to look at it

Conflicts of Interest

MVAM manage conflicts of interest by ensuring MVAM staff accounts do not trade at the same time as clients where the market capitalisation of the equity is less than £1billion, in order that staff do not influence the prices attained for MVAM clients (it is assumed that where a market capitalisation of £1billion or more of an equity, for the size of trades that we are exercising, the inclusion of staff trades will not affect the price attained).

Staff are strictly prohibited from the purchase of equity direct from clients, and vice versa – any transfer of equity would have to be done through the market.

MVAM staff are required to declare any interests in any equity held outside of the MVAM systems, in order that they may not unduly exercise any influence in the purchase or sale of the equity.

MVAM operates a strict gifts and inducements policy, monitoring any offers of gifts to staff to ensure that there is no suggestion of bribery or inducement in any form.

As distributors and manufacturers of portfolio management services, MVAM Board and our compliance manager will review these product governance arrangements at least annually, and take any appropriate actions to ensure that they remain robust and fit for purpose.

The MVAM Board also receives regular management information regarding investment performance, flows, AUM, complaints, breaches and errors (including near misses), distribution and product reviews.

In designing any new products manufacture, sign off is required by the MVAM Board and our compliance manager, whose responsibility it is to ensure that the product is suitable for its intended target market and distribution channel.