

MI Activus Wealth Funds

Value Assessment 2023

Reporting End Period 31st August 2023



Introduction to the ACD Assessment of Value

The ACD is required to provide an annual statement for the Company attesting that; in the opinion of the ACD; "The costs of associated services provided to the Company under the appointment or oversight of the ACD and any other fees chargeable to the scheme property, represent value for money taking into account the criteria as set out by the Regulator under COLL 6.6.20R".

Value Assessment Criteria

AFM Costs

In relation to each charge, the cost of providing the service to which the charge relates, and when money is paid directly to associates or external parties, the cost is the amount paid to that person.

(It should be noted that the fees charged to the Fund by or on behalf of Apex Fundrock Limited acting in its capacity as the Authorised Fund Manager, are "unbundled" and set out separately in the scheme Prospectus. Together these fees make up the "AFM Costs".

The ACD has examined each of the component costs that make up the overall AFM Costs of the highest fee bearing invested share class and has applied the following criteria as set out by the FCA in the Regulations).

Quality of Service

The range and quality of services provided to shareholders.

Performance

The performance of the scheme, after deduction of all payments out of scheme property as set out in the Prospectus

Performance should be considered over an appropriate timescale, having regard to the scheme's investment objectives, policy, and strategy.



Economies of Scale

Whether the ACD is able to achieve savings and benefits from economies of scale, relating to the direct and indirect costs of managing the scheme property and taking into account the value of the scheme property and whether it has grown or contracted in size as a result of the sale and redemption of units.

Comparable Market Rates

In relation to each service, the market rate for any comparable service provided:

by the ACD; or

to the ACD or on its behalf including by a person to which any aspect of the scheme's management has been delegated.

Comparable Services

In relation to each separate charge, the AFM's charges, and those of its associates for comparable services provided to clients, including for institutional mandates of a comparable size, and having similar investment objectives and policies.

Classes of Shares

Whether it is appropriate for shareholders to hold units in classes subject to higher charges than those applying to other classes of the same scheme with substantially similar rights.



AFM Costs - Fees & Services Chargeable to the Fund

Fees and Services of the Authorised Corporate Director

- Apex Fundrock Ltd is the FCA Authorised Corporate Director of the Fund (ACD) responsible for the set-up, management, and wind-up of the Fund under the Regulations.
- The ACD is responsible for ensuring that all aspects of the Fund are appropriately and properly managed and for the oversight of any and all third parties delegated by the ACD to provide services to the Fund.
- The services of the ACD are subject to a tightly defined Service Level Agreement and Key Performance Indicators which are used to assess the quality and performance of the ACD.
- The ACD fees are regularly reviewed against comparable market rates for a professional ACD for hire providing comparable services taking into account the complexity and risk profile of the Funds.
- The ACD's fees are clearly set out in the scheme documentation and are tiered based on the overall value of the Funds to reflect economies of scale. All investors in the Fund share equally in these economies of scale across all classes of units.

The Assessment of Value in respect of the services rendered to the Fund by the ACD is as follows:

Quality of Service:	Good
Performance (of Duties):	Good
Cost Of Service:	Competitive
Economies of Scale:	Good Value – All Investors Benefit Equally
Comparable Market Rates:	Competitive
Comparable Services:	Competitive
Classes of Units:	Competitive

AFM Costs - Fees & Services Chargeable to the Fund (continued)

Fees and Services of the Fund Administrator

- The Fund Administrator, Apex Fundrock Ltd is responsible for the administration and record-keeping of the Fund including, but not limited to, the calculation of the daily Net Asset Valuation; the preparation of the Annual Report and Accounts and Interim Financial Statements; the maintenance of the Shareholder Register; the administration of Investor Subscription and Redemptions and the provision of an on-line and telephone enquiry service for investors and their advisers.
- The services of the Fund Administrator are subject to a tightly defined Service Level Agreement and Key Performance Indicators which are used to assess the quality and performance of the ACD.
- The Fund Administration fees are regularly reviewed by the ACD against comparable market rates for a professional Fund administrator for hire providing comparable services, taking into account the complexity and risk profile of the Funds.
- The Fund Administration fees are clearly set out in the scheme documentation and are tiered based on the overall value of the Fund to reflect economies of scale. All investors in the Fund share equally in these economies of scale across all classes of units.

The ACD's Assessment of Value in respect of the Fund Administration services rendered to the Fund is as follows:

Quality of Service:	Good
Performance (of Duties):	Good
Cost Of Service:	Competitive
Economies of Scale:	Good Value – All Investors Benefit Equally
Comparable Market Rates:	Competitive
Comparable Services:	Competitive
Classes of Units:	Competitive

AFM Costs - Fees & Services Chargeable to the Fund (continued)

Fees and Services of the Depositary and Custodian

- The Depositary, Northern Trust Investor Services Limited, is responsible for the safekeeping of the assets of the Fund, for the monitoring of cash flows, and for the appointment and oversight of the Custodian who is responsible for the safekeeping of the assets of the Fund in physical or electronic form in the markets in which the Fund invests. The Custodian is also responsible on behalf of the Fund for the collection of income and dividends, the processing of corporate actions and the reclaim of tax under any applicable double taxation treaties.
- The services of the Depositary and Custodian are subject to a tightly defined Service Level Agreement and Key Performance Indicators which are used by the ACD to assess the quality and performance of the Depositary and Custodian.
- The Depositary and Custody fees are regularly reviewed by the ACD against comparable market rates for a professional Depositary for hire providing comparable services, taking into account the complexity and risk profile of the Funds.
- The Depositary and Custody fees are clearly set out in the scheme documentation and are tiered based on the overall value of the Fund to reflect economies of scale. All investors in the Fund share equally in these economies of scale across all classes of units.

The ACD's Assessment of Value in respect of the services rendered to the Fund by the Depositary and Custodian is as follows:

Quality of Service:	Good
Performance (of Duties):	Good
Cost Of Service:	Competitive
Economies of Scale:	Good Value – All Investors Benefit Equally
Comparable Market Rates:	Competitive
Comparable Services:	Competitive
Classes of Units:	Competitive

AFM Costs - Fees & Services Chargeable to the Fund (continued)

Fees and Services of the Auditor

- The Fund Auditor Grant Thornton UK LLP, is appointed by the ACD.
- The appointment of the Auditor is reviewed annually.
- The Auditor fees are reviewed annually by the ACD against comparable market rates for a professional Fund Auditor for hire providing comparable services, taking into account the complexity and risk profile of the Funds.
- The Auditor fees are clearly set out in the scheme documentation and are provided to the Fund as part of an overall contract to provide Auditor services to this Fund and other schemes under the management of the ACD, enabling Fund investors to take advantage from the overall economies of scale so afforded, irrespective of share class.

The ACD's Assessment of Value in respect of Auditor services rendered to the Fund is as follows:

Quality of Service:	Good
Performance (of Duties):	Good
Cost Of Service:	Competitive
Economies of Scale:	Good Value – All Investors Benefit Equally
Comparable Market Rates:	Competitive
Comparable Services:	Competitive
Classes of Units:	Competitive



Fees and Services of the Investment Manager

- The Investment Management function is delegated by the ACD to Activus Wealth Ltd an FCA authorised professional investment management firm.
- The Investment Manager is responsible for the management and investment of the assets within the Fund in accordance with the Investment Objective and Policy as set out in the scheme documentation.
- The Investment Manager provides an active investment management service consistent with the Investment Policy and Objectives set out within the scheme documentation.
- The ACD reviews the services of the Investment Manager, including detailed due diligence of their policies, processes, procedures, and controls on an on-going basis.
- The fees of the Investment Manager represent the largest cost to the Company, are clearly set out within the scheme documentation and are consistent with the market rates for other professional investment managers for hire providing comparable services for similar Fund types.
- The investment management fees vary by share class reflecting the size of the minimum investment into that share class, with the objective of providing economies of scale for larger investors. It is the opinion of the ACD that smaller investors benefit significantly from the economies of scale that accrue to the Fund based on the scale of investment provided by institutional investors and that Fund costs are proportionately reduced for all investors due to the high value of institutional investment in the Fund and that lower fee-paying share classes for larger investors are appropriate and fully justified.

In relation to the general services provided by the Investment Manager the ACD has made the following assessment:

Quality of Service:	Good
Performance (of Duties):	Good
Cost Of Service:	Good
Economies of Scale:	Good Value – All Investors Benefit Equally
Comparable Market Rates:	Good
Comparable Services:	Good
Classes of Units:	Good



Fund Performance

Overview of the criteria used to assess Value regarding Fund Performance

- One of the key challenges for the ACD in making an overall assessment of value which considers performance is the fact that the quantum of performance, positive or negative, is likely to significantly outweigh the percentage costs of the services provided to the Funds described in this Value Assessment.
- To provide an objective measure of performance and value the ACD has adopted the following methodology. The performance of the Fund has been assessed based on the Fund's position within its elected Investment Association Fund sector over 1, 3, 5 and 10 years if applicable.
- Funds that are in the top 50th percentile of their chosen sector would typically be rated as "Good" value; Funds in the 50th-75th quartile as "Fair" value, and Funds that are in the lower quartile as "Poor" value. However, the ACD will also take into account whether or not the Fund has met its stated investment objectives, such as performance against CPI or other comparator irrespective of its sector ranking.
- Funds that have met their stated Investment Objectives, where the objective is empirical and measurable will be assessed as being "Good Value" regardless of sector ranking.
- Fund performance is assessed after the deduction of all charges and is based on the highest charging invested share class.
- The ACD has included information relating to the Investment Objective and Policy of the Fund, the Fund's past performance and the Fund's risk profile, for the highest charging invested share class.

MI Activus Investment Fund

Sub-Fund Overall Value Assessment score 31st August 2023

The ACD has produced an overall assessment of value for the sub-fund taking into account the value provided across all the services that underpin the management and operation of the sub-fund, using the criteria set out in the Regulations and described in this document. The performance of the sub-fund is a significant factor in the derivation of this assessment. However, while the assessment of value is not solely driven by performance, funds that are consistently poor performers over time when compared against funds with a similar investment outlook, are likely to be graded as “poor value”.

Fair Value

Sub-Fund Performance 31st August 2023

The MI Activus Investment Fund has a stated objective of achieving a return of +5% over the Bank of England Base Rate over the full market cycle. In the twelve months to end August 2023 the Bank of England Base Rate has increased significantly from 1.75% to 5.25% to combat higher inflation. These rates are well above those in recent history, and it is expected that they will begin to fall in 2024. The higher level of interest rates has meant that all funds with Base Rate+ benchmarks have struggled to meet their objectives. As a result, we believe that a Value Assessment should consider how the Fund has performed relative to comparable funds. When the Fund is compared to other comparable funds (IA Absolute Return) it has underperformed over the last 12 months, performed broadly in line over 3 years and over 5 years has significantly outperformed.

Taking all the above into consideration the ACD's Assessment of Value in respect of the Investment Management services rendered to the Fund is as follows:

1 Year	Poor
3 Years	Fair
5 Years	Good

Investors should recognise that the Fund is actively managed and is SRRRI risk rated 5 and that short-term market volatility can affect the performance over all time periods positively or negatively. Every fund will have periods of weak performance, and this should also be considered when investing in any fund.

The Investment Manager has made the following commentary in respect of the performance of the Fund:

Manager's review

The MI Activus Investment Fund A Accumulation published share price is down 5.9% in the year to 31 August 2023. Although volatility in equity markets was down on the levels seen in 2022, uncertainty remained through the first half of 2023 as the Bank of England continued to raise interest rates while inflation, although falling slowly, remained stubbornly high. According to the Office for National Statistics the CPI measure of inflation fell from 10.5% in December 2022 to 6.8% in July of this year, still well above the Bank of England's target of 2%. While many commentators feel we are close to a base rate high, it is worth noting that two members of the Monetary Policy Committee voted for a 0.5% increase in August, citing the latest private sector pay data showing an increase in average pay of 7.7%.

In March, the beginning of the second half of the year, the Sub-fund was down 5.0%. The run-on Silicon Valley Bank (SVB) in early March hit our venture capital holdings particularly hard: Molten Ventures, RTW Venture Fund and Syncona finishing the month down 30%, 15% and 13% respectively. Despite the regulator acting quickly to set up and transfer all of SVB's deposits to a new bank, the Deposit Insurance National



Bank of Santa Clara, investors remain nervous and share prices are taking time to recover. Through the month we continued to trim our holding in Rights & Issues Investment Trust following the change in manager. We reinvested the proceeds in Pantheon Infrastructure which has recently reiterated its 4p dividend for this year and initiated a share buyback and looks good value at a discount to Net Asset Value of over 20%.

The Sub-fund gained 2% in April, with markets in somewhat of a holding pattern throughout the month with no sharp moves up or down. All of the major potential influences on market sentiment were still there but the news in each of these areas has been largely neutral this month. The Ukraine situation was pretty static with the front line seemingly ossifying at the forces' respective winter positions and a much-anticipated Ukraine counteroffensive not yet started. Official public pronouncements from various Western Governments regarding the activities of Russian spy ships apparently in preparation for attacks on European energy and communication networks were a worrying sign of how easily the war could escalate. The Chinese sabre-rattling in the South China Sea took on a more menacing nature during the month in response to the US speaker meeting with the Taiwan president as it demonstrated how it would try to seal off the island in the event of a war. Although even in this area China publicly backed down on an announced three day no-fly zone after international protests. Macron's unhelpful diplomacy in China, including a speech widely interpreted to mean that Europe had no view about a China takeover of Taiwan, and a request for Xi to broker a peace deal in Ukraine, merely showed cracks in the Western alliance. Grave geopolitical risks continued to exist in many areas of the world but didn't appear to be having a primary effect on market sentiment. That can of course quickly change both on the upside and the downside.

In May MI Activus Investment Fund gained 0.6% with mixed fortunes across the portfolio. Private equity was the best performing sector while infrastructure investments struggled. During the month we increased our holdings in investment companies Third Point Investors, HgCapital and Pershing Square Holdings, all of which remain at historically significant discounts to NAV. We also added to our US exposure, topping up our position in Berkshire Hathaway.

June saw a further rise in the Bank of England base rate of 0.5%. This resulted in long dated cashflows being revalued downwards which impacted the price of assets such as bonds and infrastructure. In our monthly commentaries we regularly wrote about how underlying values are holding up and how it is the market prices of the vehicles which are down and why we and many other commentators believe this is likely to be a temporary phenomenon. At this point we see no reason to change the underlying rationale behind our "remain patient and wait for the reversion" message.

July and August were quiet months for market news, while the Bank of England continued to raise interest rates and inflation continued to fall more slowly than they would like. At the start of August, we disposed of our holdings in Open-Ended Investment Companies Ruffer Diversified Return, Henderson European Absolute, BlackRock European Absolute Alpha, SDL UK Buffettology, Amati UK Smaller Companies and Amati Strategic Metals. The Sub-fund is now invested wholly in listed companies, the rationale being the opportunity to pick up investment companies with strong track records at often historically wide discounts to Net Asset Value. We also disposed of our HarbourVest Global holding and opened a new position in Scottish Mortgage at a 20% discount to NAV. Historically Scottish Mortgage has traded around NAV and the current discount offers huge potential for future gains.

Adhering to our long-term policy of ignoring market noise is paramount at this point in time. We feel the Sub-fund is positioned to benefit significantly as market confidence returns and discounts to Net Asset Values revert to long term means. This is of course not guaranteed, and prices could fall further, however the current level of discounts do provide a tailwind for improved long-term returns

MI Activus Investment Fund

Fund Information

Key Investor Information

This document provides you with key investor information about this fund. It is not marketing material. The information is required by law to help you understand the nature and the risks of investing in this fund. You are advised to read it so you can make an informed decision about whether to invest.



MI Activus Investment Fund ("the Fund") A Accumulation Shares

The Fund is a Sub-Fund of MI Activus Wealth Funds. The Fund is an Open Ended Investment Company. ISIN: GB00BYPKW395
Apex Fundrock Ltd is the Authorised Corporate Director of the Fund ("MI" and "MI Funds" are trading names of the ACD).

Objectives and investment policy

The Fund aims to achieve capital growth. It aims to deliver a return (before fees) of at least the Bank of England Base Rate plus 5%, with lower volatility than global equity market indices.

The Fund aims to achieve a positive return over a three year period. However, capital is at risk and there is no guarantee that a positive return will be achieved.

The portfolio will be diversified at all times in order to spread risk and reduce volatility. It will include indirect investment in a range of asset classes which may include: company shares; bonds (which are like loans to companies, governments and other organisations that can pay a fixed or variable interest rate); private equity (which is money invested in firms which are not listed on any stock exchange); currencies; commodities; real estate and other alternative investment strategies to the extent that each is permitted by the Regulations.

The Fund will invest in these asset classes through other investment funds and exchange traded funds. The Fund may also invest in other transferable securities. The composition of the portfolio will reflect the Investment Managers view of the potential future return of different underlying asset classes and specific investments.

The Investment Manager is able to invest the Fund's portfolio into derivatives, which are sophisticated investments that are linked to the rise and fall of prices of other assets. Derivatives will be used both to achieve the investment objective and for the purposes of efficient portfolio management to simply reduce risk or manage the Fund more efficiently.

Any income this share class generates will be reinvested to grow the value of your investment.

You can buy and sell shares on any business day in London.

Recommendation: this Fund may not be appropriate for investors who plan to withdraw their money within 3 years.

For full investment objectives and policy details please refer to the prospectus.

Risk and reward profile

The Risk and Reward Indicator table demonstrates where the Fund ranks in terms of its potential risk and reward. The higher the rank the greater the potential reward but the greater the risk of losing money. It is based on past data, may change over time and may not be a reliable indication of the future risk profile of the Fund. The shaded area in the table below shows the Fund's ranking on the Risk and Reward Indicator.



- The Fund is ranked at 5 because funds of this type have experienced medium to high rises and falls in value in the past. Please note that even the lowest risk class can lose you money and that extreme market circumstances can mean you suffer severe losses in all cases. The indicator does not take into account the following risks of investing in this Fund:
- The Fund invests into other funds which themselves invest in assets such as bonds, company shares, cash and currencies. The objectives and risk profiles of these underlying funds may not be fully in line with those of this Fund.
- Bond values are affected by changes in interest rates, inflation and any decline in creditworthiness of the bond issuer. Bonds that produce a higher level of income usually also carry greater risk as such bond issuers may not be able to pay the bond income as promised or could fail to repay the capital amount used to purchase the bond. There may be cases where the organisation from which we buy a bond fails to carry out its obligations, which could cause losses to the Fund.
- Investing overseas can bring additional returns and spread risk to different markets. There are risks, however, that changes in currency exchange rates may cause the value of your investment to decrease and increase.
- This Fund can use derivatives in order to meet its investment objectives or to protect from price and currency movement. This may result in gains or losses that are greater than the original amount invested.
- For further risk information please see the prospectus.

MI Activus Investment Fund

Fund Information



Charges

The charges you pay are used to pay the costs of running the Fund, including the costs of marketing and distributing it. These charges reduce the potential growth of your investment.

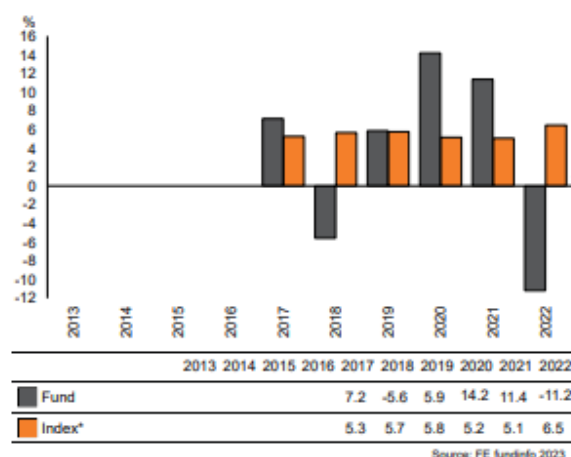
One-off charges taken before or after you invest	
Entry charge	0.00%
Exit charge	0.00%

These are the maximum charges that we might take out of your money before it is invested and before we pay out the sale proceeds of your investment. In some cases, you might pay less and you should speak to your financial adviser about this.

Charges taken from the Fund over a year	
Ongoing charges	2.90%

Charges taken from the Fund under specific conditions	
Performance fee	NONE

Past performance



Practical information

- This document is issued by Apex Fundrock Ltd and contains information on the A Accumulation shares only ("MI" and "MI Funds" are trading names of the ACD).
- Each fund of the Company has its own pool of assets and liabilities, segregated by law. If one fund were unable to pay for its liabilities the assets of the other funds could not be used to pay for those liabilities.
- You can get further detailed information regarding the Fund, including details of the investment manager and how to switch, buy and sell units and other unit classes available, within the prospectus, the supplementary information document and the annual and half yearly managers' reports. You can get these free of charge from Apex Fundrock Ltd, Hamilton Centre, Rodney Way, Chelmsford, Essex CM1 3BY or from our website: www.fundrock.com. These are available in English only. You can call us on 0345 026 4285, or look on our website for the latest share prices.
- Details of the ACD's remuneration policy (including a description of how remuneration and benefits are calculated, the composition of the remuneration committee and the identities of persons responsible for awarding remuneration and benefits) are available at www.fundrock.com/mi-fund-data or by requesting a paper copy free of charge (see above for contact details).
- The Depositary of the Fund is Northern Trust Investor Services Limited.
- Please note that the tax laws of the United Kingdom may impact your own tax position.
- Apex Fundrock Ltd may be held liable solely on the basis of any statement contained in this document that is misleading, inaccurate or inconsistent with the relevant parts of the prospectus for the Fund.

- The ongoing charges figure is based on the last year's expenses and may vary from year to year. It excludes the costs of buying or selling assets for the Fund (unless these assets are shares of another fund).
- For the ongoing charge, the figure is as at 28 February 2023.
- You may also be charged a dilution levy on entry to or exit from the Fund, this is to cover costs associated with your transaction.
- For more information about charges, please see the prospectus.

- You should be aware that past performance is not a guide to future performance.
- Fund launch date: 19/07/2016.
- Share/unit class launch date: 19/07/2016.
- Performance is calculated in GBP.
- * Bank Of England Base Rate + 5%

MI Activus Opportunity Fund

Sub-Fund Overall Value Assessment score 31st August 2023

The ACD has produced an overall assessment of value for the sub-fund taking into account the value provided across all the services that underpin the management and operation of the sub-fund, using the criteria set out in the Regulations and described in this document. The performance of the sub-fund is a significant factor in the derivation of this assessment. However, while the assessment of value is not solely driven by performance, funds that are consistently poor performers over time when compared against funds with a similar investment outlook, are likely to be graded as "poor value".

Fair Value

Sub-Fund Performance 31st August 2023

The MI Activus Opportunity Fund has a stated objective of achieving a return of +5% over the UK CPI over a five-year period. In the twelve months to end August 2023 the UK CPI inflation rate was 6.7%, well above the Bank of England's 2% target. It is expected that inflation will fall close to target in 2024. This elevated inflation rate has meant that all funds with CPI+ benchmarks have struggled to meet their objectives. As a result, we believe that a Value Assessment should consider how the Fund has performed relative to comparable funds. When the Fund is compared to other comparable funds (IA Absolute Return) it has underperformed over the last 12 months. Over 3 and 5 years the Fund has also underperformed but in both cases the it would be in the third quartile of all funds.

Taking all the above into consideration the ACD's Assessment of Value in respect of the Investment Management services rendered to the Fund is as follows:

1 Year	Poor
3 Years	Fair
5 Years	Fair

Investors should recognise that the Fund is actively managed and is SRRRI risk rated 5 and that short-term market volatility can affect the performance over all time periods positively or negatively. Every fund will have periods of weak performance, and this should also be considered when investing in any fund.

The Investment Manager has made the following commentary in respect of the performance of the Fund:

Manager's review

The MI Activus Opportunity Fund A Accumulation published share price is down 3.7% in the year to 31 August 2023. Over the course of the last 12 months, we frequently wrote about the differences that can arise between the share price and the Net Asset Value (NAV) of investment companies which are listed on a stock exchange. When an investment company's share price is lower than its NAV it is said to be trading at a 'discount' and when the share price is above its NAV it is at a 'premium'. There are many reasons why a share price does not always equal the NAV which we have discussed in the past. Russia invading Ukraine in February 2022 sparked the most recent widening of discounts to NAV and this has been exacerbated by concerns over rising interest rates and inflation. We believe that as in previous periods patience will be rewarded.



We predominantly invest in listed investment companies so a material widening of discounts has a strongly negative impact on our stated performance which is based upon share prices rather than Net Asset Values. We consider that the Sub-fund's current share price materially understates the value of the underlying companies due to the unwarranted discounts at which they currently trade. We believe it is likely that investors will look back at this time as a golden opportunity to invest in heavily discounted listed investment company shares and a growing number of market commentators are starting to echo this viewpoint.

At the beginning of the year, we took the decision to reduce our holdings in Augmentum Fintech and Seraphim Space. These are towards the riskier end of the portfolio, and we felt that as their discounts to Net Asset Value had narrowed significantly through January and February, they no longer offered good value. Proceeds were used to increase our positions in Apax Global Alpha, Biotech Growth, Pantheon International, Worldwide Healthcare and HgCapital, all of which have seen their discounts widen to historically significant levels and offer much better value than Augmentum Fintech and Seraphim Space.

During April we disposed of our position in BH Macro at a 6% premium to Net Asset Value. We used the proceeds to increase existing holdings at very attractive discounts to Net Asset Value, including RTW Venture and RIT Capital Partners at discount of around 35% and 19% respectively. RIT Capital Partners has in the recent past traded close to Net Asset Value, however the discount has grown to an unprecedented level this year after negative, but in our view unwarranted, concerns over its exposure to private equity.

Trading was fairly light through the rest of the period, however we did increase our positions in top performing private equity investment company 3i from 4.8% of the Sub-fund at the end of February, to 8.4% at the end of August. It is now our second largest holding behind HgCapital and is up 23% for the six-month period.

Other notable performances for the period from 28 February came from Polar Capital Technology, up 16%, and Berkshire Hathaway, up 18%. The largest detractors on performance were in venture capital where Molten Ventures and Syncona were down 37% and 23% respectively.

There were many issues that impacted on markets over the last six months, one of which being the impasse and eventual apparent agreement to raise the US debt ceiling in May. The twin factors of the currently highly polarised US political landscape and the fact that the rate of increase of borrowing has continued to accelerate drastically, the debt ceiling increase threatened to blow up in a spectacular fashion with a potential US default on its debts in June. The US has accumulated as much debt-to-GDP in the last 20 years as it did over two world wars and the Great Depression combined. Gross debt-to-GDP ratio was 62% in 2007 and will be 122% this year and according to the IMF it is on track to overtake Italy by 2028. The effect on the world economy of an actual US default on debt is impossible to predict but it would certainly be a massive shock to the financial system with many unforeseeable consequences.

The decade long experiment with Quantitative Easing was, according to many economic observers, always likely to lead eventually to inflation and this continued to be of concern to central banks through 2023. The situation has been exacerbated by measures taken to avoid the effects of COVID lockdowns and supply shocks resulting from Putin's war in Ukraine. How long will this higher inflation last? Is it, as some argue, a merely transitory effect of these crises which will naturally disappear or will it, as inflation has been prone to do in the past, cause a wage price spiral altering workers and consumers view as to future prices thereby embedding higher inflation. You may hear compelling arguments from both camps, but whichever side of the argument you fall it would be a brave person who would bet their house on it.

Other issues that added to market uncertainty and volatility over the past 12 months included the ongoing war in Ukraine, the cold war between China and the USA, advances in artificial intelligence and climate change. While all of these issues are seemingly worthy of a note by themselves it is important not to dwell on any particular issue because even though each of them will likely have an impact on markets, it is not possible to predict any particular outcome and its effects are in any case unknowable, both by magnitude and more fundamentally by which direction a given market will move. It would therefore be an indulgence on our part to think and write about topics which are undoubtedly very interesting, but which do not assist in managing money. Our primary job is to manage money by focusing on what we can control, rather than philosophising and making predictions on what we cannot. A quote widely attributed to legendary baseball player and philosopher Yogi Berra (although it has also been attributed to physicist Niels Bohr amongst others), is: "Prediction is difficult, especially about the future." Our approach to investing, which does not try to predict the future, is definitely not unique but it does seem to be uncommon.

At the current time, for return-seeking higher-risk assets we see value in publicly listed investment companies, particularly in private markets, where we believe prices reflect a very dim view on the value of the underlying assets. In some cases, one can acquire a portfolio of private companies for less than 50% of the stated Net Asset Value. There is increasing evidence, by way of sales of portfolio companies at a premium to carrying value or by year-on-year increases in revenue and EBITDA, that the stated Net Asset Values are reasonable. Our positioning is not an attempt to predict which way the market for private assets will go, rather it is our observation that the price of our investments will likely rise to narrow the discount to Net Asset Value at which they currently trade.

MI Activus Opportunity Fund

Fund Information

Key Investor Information

This document provides you with key investor information about this fund. It is not marketing material. The information is required by law to help you understand the nature and the risks of investing in this fund. You are advised to read it so you can make an informed decision about whether to invest.



MI Activus Opportunity Fund ("the Fund") A Accumulation Shares

The Fund is a Sub-Fund of MI Activus Wealth Funds. The Fund is an Open Ended Investment Company. ISIN: GB00BFYMDH41
Apex Fundrock Ltd is the Authorised Corporate Director of the Fund ("MI" and "MI Funds" are trading names of the ACD).

Objectives and investment policy

The Fund aims to achieve capital growth. It aims to deliver a return (before fees) of at least the UK Consumer Price Index plus 5% per annum over a 5 year period.

The Fund aims to achieve a positive return over a five year period. However, capital is at risk and there is no guarantee that a positive return will be achieved.

The Fund will generally invest in collective investment schemes, listed investment companies and exchange traded funds. Through such investments, the portfolio will achieve indirect exposure to a diversified range of asset classes and assets therein. These asset classes will vary over the time but are selected from the following: equities, fixed income, private equity, currencies, commodities, real estate and alternative investment strategies to the extent that each is permitted by the applicable laws and regulations.

The Fund may also invest directly in other transferable securities which may include: company shares, bonds (which are like loans to companies, government and other organisations that can pay a fixed or variable interest rate), private equity, money market instruments, deposits, cash and near cash investments.

The Fund will generally invest its assets in collective investment schemes, listed investment companies and exchange traded funds. However, the Investment Manager will continually assess market conditions and, if it believes it is necessary and for the benefit of the investors, it can adjust the asset allocation of such investments which may result either in a decrease in the proportion of investments in collective investment schemes, listed investment companies and exchange traded funds and increased exposure to other transferable securities, money market instruments, deposits, cash and near cash investments and derivatives or vice versa.

The composition of the portfolio will reflect the Investment Managers view of the potential future return of different underlying asset classes and specific investments.

The Investment Manager is able to invest the Fund's portfolio into derivatives, which are sophisticated investments that are linked to the rise and fall of prices of other assets. Derivatives will be used both to achieve the investment objective and for the purposes of efficient portfolio management to simply reduce risk or manage the Fund more efficiently.

Any income this share class generates will be reinvested to grow the value of your investment.

You can buy and sell shares on any business day in London.

Recommendation: this Fund may not be appropriate for investors who plan to withdraw their money within 5 years.

For full investment objectives and policy details please refer to the prospectus.

Risk and reward profile

The Risk and Reward Indicator table demonstrates where the Fund ranks in terms of its potential risk and reward. The higher the rank the greater the potential reward but the greater the risk of losing money. It is based on past data, may change over time and may not be a reliable indication of the future risk profile of the Fund. The shaded area in the table below shows the Fund's ranking on the Risk and Reward Indicator.



- The Fund is ranked at 5 because funds of this type have experienced medium to high rises and falls in value in the past. Please note that even the lowest risk class can lose you money and that extreme market circumstances can mean you suffer severe losses in all cases. The indicator does not take into account the following risks of investing in this Fund:
- The Fund invests into other funds which themselves invest in assets such as bonds, company shares, cash and currencies. The objectives and risk profiles of these underlying funds may not be fully in line with those of this Fund.
- Bond values are affected by changes in interest rates, inflation and any decline in creditworthiness of the bond issuer. Bonds that produce a higher level of income usually also carry greater risk as such bond issuers may not be able to pay the bond income as promised or could fail to repay the capital amount used to purchase the bond. There may be cases where the organisation from which we buy a bond fails to carry out its obligations, which could cause losses to the Fund.
- Investing overseas can bring additional returns and spread risk to different markets. There are risks, however, that changes in currency exchange rates may cause the value of your investment to decrease and increase.
- This Fund can invest in derivatives in order to meet its investment objectives or to protect from price and currency movement. This may result in gains or losses that are greater than the original amount invested.
- For further risk information please see the prospectus.

MI Activus Opportunity Fund

Fund Information



Charges

The charges you pay are used to pay the costs of running the Fund, including the costs of marketing and distributing it. These charges reduce the potential growth of your investment.

One-off charges taken before or after you invest	
Entry charge	0.00%
Exit charge	0.00%

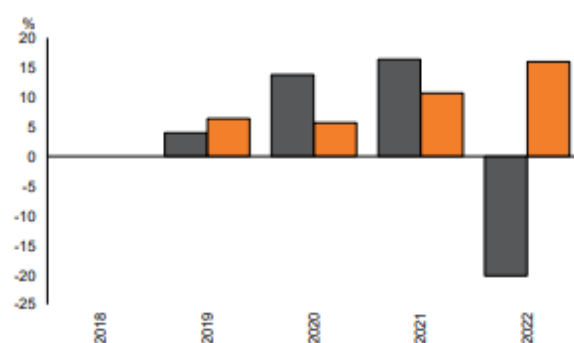
These are the maximum charges that we might take out of your money before it is invested and before we pay out the sale proceeds of your investment. In some cases, you might pay less and you should speak to your financial adviser about this.

Charges taken from the Fund over a year	
Ongoing charges	3.40%

Charges taken from the Fund under specific conditions	
Performance fee	NONE

- The ongoing charges figure is based on the last year's expenses and may vary from year to year. It excludes the costs of buying or selling assets for the Fund (unless these assets are shares of another fund).
- For the ongoing charge, the figure is as at 31 August 2023.
- You may also be charged a dilution levy on entry to or exit from the Fund, this is to cover costs associated with your transaction.
- For more information about charges, please see the prospectus.

Past performance



	2018	2019	2020	2021	2022
Fund		4.0	13.8	16.4	-20.2
Index*		6.4	5.7	10.7	16.0

Source: FE fundinfo 2023

- You should be aware that past performance is not a guide to future performance.
- Fund launch date: 03/07/2018.
- Share/unit class launch date: 03/07/2018.
- Performance is calculated in GBP.
- * UK Consumer Price Index + 5%

Practical information

- This document is issued by Apex Fundrock Ltd and contains information on the AAccumulation shares only ("MI" and "MI Funds" are trading names of the ACD).
- Each fund of the Company has its own pool of assets and liabilities, segregated by law. If one fund were unable to pay for its liabilities the assets of the other funds could not be used to pay for those liabilities.
- You can get further detailed information regarding the Fund, including details of the investment manager and how to switch, buy and sell units and other unit classes available, within the prospectus, the supplementary information document and the annual and half yearly managers' reports. You can get these free of charge from Apex Fundrock Ltd, Hamilton Centre, Rodney Way, Chelmsford, Essex CM1 3BY or from our website: www.fundrock.com. These are available in English only. You can call us on 0345 026 4285, or look on our website for the latest share prices.
- Details of the ACD's remuneration policy (including a description of how remuneration and benefits are calculated, the composition of the remuneration committee and the identities of persons responsible for awarding remuneration and benefits) are available at www.fundrock.com/mi-fund-data/uk-fund-administration/mi-fund-data/ or by requesting a paper copy free of charge (see above for contact details).
- The Depositary of the Fund is Northern Trust Investor Services Limited.
- Please note that the tax laws of the United Kingdom may impact your own tax position.
- Apex Fundrock Ltd may be held liable solely on the basis of any statement contained in this document that is misleading, inaccurate or inconsistent with the relevant parts of the prospectus for the Fund.

MI Activus Diversified Fund

Sub-Fund Overall Value Assessment score 31st August 2023

The ACD has produced an overall assessment of value for the sub-fund taking into account the value provided across all the services that underpin the management and operation of the sub-fund, using the criteria set out in the Regulations and described in this document. The performance of the sub-fund is a significant factor in the derivation of this assessment. However, while the assessment of value is not solely driven by performance, funds that are consistently poor performers over time when compared against funds with a similar investment outlook, are likely to be graded as "poor value".

Fair Value

Sub-Fund Performance 31st August 2023

The MI Activus Diversified Fund has a stated objective of achieving a return of +2% over the UK CPI over a three-year period. In the twelve months to end August 2023 the UK CPI inflation rate was 6.7%, well above the Bank of England's 2% target. It is expected that inflation will fall close to target in 2024. This elevated inflation rate has meant that all funds with CPI+ benchmarks have struggled to meet their objectives. As a result, we believe that a Value Assessment should consider how the Fund has performed relative to comparable funds. When the Fund is compared to other comparable funds (IA Mixed 0-35% shares) it has underperformed over the last 12 months but in the 2 years since its inception it has performed broadly in line with the median fund.

Taking all the above into consideration the ACD's Assessment of Value in respect of the Investment Management services rendered to the Fund is as follows:

1 Year	Poor
3 Years	Fair

Investors should recognise that the Fund is actively managed and is SRRI risk rated 4 and that short-term market volatility can affect the performance over all time periods positively or negatively. Every fund will have periods of weak performance, and this should also be considered when investing in any fund.

The Investment Manager has made the following commentary in respect of the performance of the Fund:

Manager's review

The MI Activus Diversified Fund A Accumulation published share price is down 9.3% in the year to 31 August 2023. The start of the period saw increased volatility in markets after the then chancellor Kwasi Kwarteng's mini budget on the 23 September 2022. Entitled "The Growth Plan", the statement was not well received by market participants and saw the pound fall sharply in value, reaching a record low since decimalisation in 1971 of \$1.0327. The most controversial elements, such as abolishing the 45% rate in income tax, were quickly reversed and the whole episode ultimately resulted in Kwarteng resigning on the 14 October 2022, after only 38 days in the post. Prime Minister Liz Truss would last only ten days longer, resigning on the 24 October 2022, leaving the way clear for her defeated leadership rival Rishi Sunak to move into Number 10. The turbulence caused by the mini budget saw the Sub-fund value drop by 5% in September, with real estate, infrastructure and fixed income holdings hit particularly hard.

October saw a series of events, any one of which would have been considered material in previous years, seeing markets seesawing wildly including: a change in Chancellor and Prime Minister as Rishi Sunak took over from Liz Truss, UK inflation reaching levels not seen in a generation, the continuing of the Russian invasion of Ukraine, the collapse of the fragile grain deal between Russia and Ukraine, large falls in



large technology stocks following weak trading figures and President Xi reiterating his intention to “reunify” Taiwan and China as soon as possible. Despite the global backdrop the MI Activus Diversified Fund was up 1.2% for the month as UK and US equity markets made small gains and confidence in UK financial markets was boosted by the change of Prime Minister and Chancellor.

Compared to October, November and December were quiet months for news as the new UK leadership tried to reassure markets that they had a plan to get inflation under control. While equity markets continued to be volatile over the last two months of the year, increases in gold and silver prices through November saw our holding in BlackRock World Mining gain 14% and it would end the year as one of the Sub-fund's top performers, up over 19% for 2022.

January was a positive month for the Sub-fund. It was up 0.7% mainly thanks to Oakley Capital Investments, BlackRock World Mining and Urban Logistics REIT, which were up 8%, 8% and 7% respectively. The biggest detractor was RIT Capital Partners after some negative press at the start of January regarding its asset allocation saw its discount to Net Asset Value widen from 11% to 20%.

During February we increased our position in BH Macro through a placing below market price. We also added to our position in Supermarket Income REIT after a positive update from the Investment Manager and reduced our holding in Rights & Issues Investment Trust. Rights & Issues Investment Trust has been a top performing investment company over many years, however, following the retirement of long-time manager Simon Knott towards the end of 2022 we felt this was a good time to sell.

In March net inflows to the Sub-fund were over half a million pounds. We used some of this to increase existing positions in Pantheon Infrastructure, RIT Capital Partners, HgCapital and International Public Partnerships, all of which are trading at wider than normal, and in our opinion unjustified, discounts to Net Asset Value. We also increased our Gresham House Energy Storage holding, which had seen its premium to NAV narrow from around 9% in January to 3% in March and opened a new position in the iShares short date UK gilts ETF as rising interest rates have made fixed income investments more attractive.

The Sub-fund was up 0.7% in April with most sectors posting mixed results. Urban Logistics REIT was the top performer while TR Property Investment, Gresham House Energy Storage and Berkshire Hathaway all had good months. The largest detractors were Amati Strategic Metals and Real Estate Credit Investments. April was a quiet trading month for the MI Activus Diversified Fund; however, we did complete the disposal of our holding in Rights & Issues Investment Trust.

During May we disposed of the Sub-fund's holding in BioPharma Credit after investee company LumiraDx announced a fall in revenue for the first quarter of 82% on the 19 May 2023. We sold before the share price fell 3.5%. We opted to take the share option for the Supermarket Income REIT dividend at a discount to the market price.

During the month of June, the Sub-fund fell 3.1% as discounts to Net Asset Value of listed investment trusts widened across the board, more so for diversifiers such as infrastructure, property, and fixed income, resulting in larger falls in the price of lower risk portfolios. One of the primary rationales for lower risk portfolios is of course capital preservation and although there has been a fall in price this year, the underlying assets with few exceptions have demonstrated resilience in the current economic situation and on an asset value basis we believe there has been little if any diminution in value. There is a huge difference between a permanent loss which is only incurred when an asset is sold at a lower price and the mark-to-market price declines we have witnessed in the past 18 months which are mostly as an outcome of discount widening.

July is traditionally very quiet for markets and this year was no exception. The conversation surrounding peaks in interest rates continued and consensus seems to be that we are close to the top. Inflation has been falling and while many commentators are suggesting a return to the generally accepted central bank target of 2%, we remain somewhat sceptical. With current discounts to Net Asset Value materially undervaluing UK listed investment companies, a significant majority of the portfolio's assets are held through closed rather than open-ended funds.

During August we disposed of our holdings in OEICs as well as our UK gilts ETF and invested in five short, dated UK gilt positions. Given the increase in the Bank of England base rate over the last 18 months and the resulting increase in gilt yields, this switch has given the Subfund an almost risk free, guaranteed return over the short term. We also switched our holding in Ruffer Diversified Return, which trades at Net Asset Value, into the Ruffer Investment, which offers exposure to the same underlying assets but was bought at a discount to NAV of over 4%. Towards the end of the month, we switched our holding in HarbourVest Global into top performing private equity firm 3i.

We continue to believe that adhering to our long-term policy of ignoring market noise is paramount at this point in time. We feel the Sub-fund is positioned to benefit significantly as market confidence returns and discounts to Net Asset Values revert to long term means.

MI Activus Diversified Fund

Fund Information

Key Investor Information

This document provides you with key investor information about this fund. It is not marketing material. The information is required by law to help you understand the nature and the risks of investing in this fund. You are advised to read it so you can make an informed decision about whether to invest.



MI Activus Diversified Fund ("the Fund") A Accumulation Shares

The Fund is a Sub-Fund of MI Activus Wealth Funds. The Fund is an Open Ended Investment Company. ISIN: GB00BL5B7698
Apex Fundrock Ltd is the Authorised Corporate Director of the Fund ("MI" and "MI Funds" are trading names of the ACD).

Objectives and investment policy

The Fund aims to achieve capital growth (after fees) of at least the UK Consumer Price Index plus 2% per annum, over a three-year period.

Your capital is at risk, however, and there is no guarantee that a positive return will be achieved over three years, or any time period. The Investment Manager has full discretion and will adopt a global multi-asset approach. The asset classes and geographical spread will vary over time.

The Fund may invest indirectly or directly in a diversified portfolio of assets which may include: company shares; bonds; money market instruments; currencies and derivatives and indirectly only in commodities; infrastructure; private equity (which is money invested in firms which are not listed on any stock exchange) and real estate to the extent that each is permitted by the Regulations.

The Fund will typically invest about 80% of the portfolio indirectly but at times, the Investment Manager may decide to invest directly where it considers efficient to do so, therefore, the indirect exposure may be higher or lower than 80% but is never expected to fall below 60%. Indirect exposure will be achieved through other investment funds and exchange traded funds anywhere in the world and in any sector. These other funds may be managed by the authorised corporate director or other third party managers. They may be actively managed or passively managed (that is funds which track or are closely linked to the performance of an index). Investment into passive funds will be limited to 20%.

The Fund is actively managed with a bias towards lower volatility assets such as alternatives and fixed income.

Typically, indirect or direct exposure in the Fund will be balanced between bonds, company shares and alternative assets (such as infrastructure and commodities), however, the asset allocation may vary significantly to protect the Fund in adverse market conditions or to pursue potential growth opportunities that arise. Asset allocation to any one of these sectors will not fall below 15% at any time.

The bonds and money market instruments which can be held by the Fund may be investment grade and/or sub-investment grade and are like loans to companies, governments and other organisations that can pay a fixed or variable interest rate and may be issued anywhere in the world. They are classified by rating agencies for their creditworthiness: those rated 'investment grade' generally carry a relatively low risk of default but also tend to offer lower yields than 'non-investment grade' bonds which in turn, generally have a higher risk of default but also tend to offer higher yields.

The Fund may use derivatives which are sophisticated instruments whose value is linked to the rise and fall of prices of other assets. Derivatives may be used for limited investment purposes to achieve the investment objective and for the purposes of efficient portfolio management, to simply reduce risk or manage the Fund more efficiently.

Any income this share class generates will be reinvested to grow the value of your investment.

You can buy and sell shares on any business day in London.

Recommendation: this Fund may not be appropriate for investors who plan to withdraw their money within 3 years.

For full investment objectives and policy details please refer to the prospectus.

Risk and reward profile

The Risk and Reward Indicator table demonstrates where the Fund ranks in terms of its potential risk and reward. The higher the rank the greater the potential reward but the greater the risk of losing money. It is based on past data, may change over time and may not be a reliable indication of the future risk profile of the Fund. The shaded area in the table below shows the Fund's ranking on the Risk and Reward Indicator.



- The Fund is ranked 4 because funds of this type have experienced average rises and falls in value in the past. Please note that even the lowest risk class can lose you money and that extreme market circumstances can mean you suffer severe losses in all cases. The indicator does not take into account the following risks of investing in this Fund:
- The Fund invests into other funds which themselves invest in assets such as bonds, company shares, derivatives, cash and currencies. The objectives and risk profiles of these underlying funds may not be fully in line with those of this Fund.
- Bond values are affected by changes in interest rates, inflation and any decline in creditworthiness of the bond issuer. Bonds that produce a higher level of income usually also carry greater risk as such bond issuers may not be able to pay the bond income as promised or could fail to repay the capital amount used to purchase the bond. There may be cases where the organisation from which we buy a bond fails to carry out its obligations, which could cause losses to the Fund.
- Investing overseas can bring additional returns and spread risk to different markets. There are risks, however, that changes in currency exchange rates may cause the value of your investment to decrease and increase.
- This Fund can use derivatives in order to meet its investment objectives or to protect from price and currency movement. This may result in gains or losses that are greater than the original amount invested.
- For further risk information please see the prospectus.

MI Activus Diversified Fund

Fund Information



Charges

The charges you pay are used to pay the costs of running the Fund, including the costs of marketing and distributing it. These charges reduce the potential growth of your investment.

One-off charges taken before or after you invest

Entry charge	0.00%
Exit charge	0.00%

These are the maximum charges that we might take out of your money before it is invested and before we pay out the sale proceeds of your investment. In some cases, you might pay less and you should speak to your financial adviser about this.

Charges taken from the Fund over a year

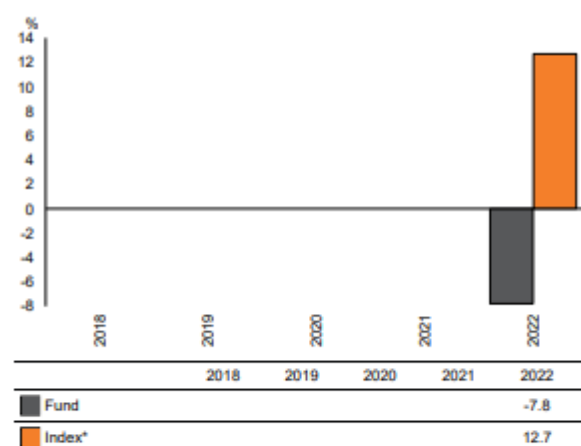
Ongoing charges	2.63%
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Charges taken from the Fund under specific conditions

Performance fee	NONE
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- The ongoing charges figure is based on the last year's expenses and may vary from year to year. It excludes the costs of buying or selling assets for the Fund (unless these assets are shares of another fund).
- For the ongoing charge, the figure is as at 28 February 2023.
- You may also be charged a dilution levy on entry to or exit from the Fund, this is to cover costs associated with your transaction.
- For more information about charges, please see the prospectus.

Past performance



Source: FE fundinfo 2023

- You should be aware that past performance is not a guide to future performance.
- Fund launch date: 01/09/2021.
- Share/unit class launch date: 01/09/2021.
- Performance is calculated in GBP.
- * UK Consumer Price Index + 2%

Practical information

- This document is issued by Apex Fundrock Ltd and contains information on the Accumulation shares only ("MI" and "MI Funds" are trading names of the ACD).
- Each fund of the Company has its own pool of assets and liabilities, segregated by law. If one fund were unable to pay for its liabilities the assets of the other funds could not be used to pay for those liabilities.
- You can get further detailed information regarding the Fund, including details of the investment manager and how to switch, buy and sell units and other unit classes available, within the prospectus, the supplementary information document and the annual and half yearly managers' reports. You can get these free of charge from Apex Fundrock Ltd, Hamilton Centre, Rodney Way, Chelmsford, Essex CM1 3BY or from our website: www.fundrock.com. These are available in English only. You can call us on 0345 026 4285, or look on our website for the latest share prices.
- Details of the ACD's remuneration policy (including a description of how remuneration and benefits are calculated, the composition of the remuneration committee and the identities of persons responsible for awarding remuneration and benefits) are available at www.fundrock.com/mi-fund-data or by requesting a paper copy free of charge (see above for contact details).
- The Depositary of the Fund is Northern Trust Investor Services Limited.
- Please note that the tax laws of the United Kingdom may impact your own tax position.
- Apex Fundrock Ltd may be held liable solely on the basis of any statement contained in this document that is misleading, inaccurate or inconsistent with the relevant parts of the prospectus for the Fund.