MI Bespoke Funds ICVC

Value Assessment 2025

Reporting End Period 31st March 2025

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 Maitland 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 MI Bespoke Funds ICVC, 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:	Competitive
Economies of Scale:	Good Value – All Investors Benefit Equally
Comparable Market Rates:	Competitive
Comparable Services:	Competitive
Classes of Units:	Competitive

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 and 5 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 Diversified Strategy Fund

Sub-Fund Overall Value Assessment score 31st March 2025

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".

Good

Sub-Fund Performance 31st March 2025

The fund managers have chosen to compare themselves to funds in the Flexible Investment sector. The Flexible Investment sector has a very wide range of funds in it and the majority tend to have a very high allocation to equities. The managers of the MI Diversified Strategy Fund as befits the name of the Fund hold a very broad range of assets and traditionally will have a lower allocation to equities than many other funds in that sector. As a result, the Fund will tend to have a lower return relative to this peer group in periods of high equity market returns (this has been the case for the last five years). Compared to the IA Flexible Investment sector the Fund is in the third quartile over five years. Over three years the Fund is broadly in line with the peer group and over one year it is in the top quartile of comparator funds. The lower returns from equities (especially from US equities) are the principal reason for the relative performance.

1 Year	Good
3 Years	Good
5 Years	Fair

Investors should recognise that the Fund is actively managed and is SRRI 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:

Performance Review

For the period since the interim accounts (30 September 2024 to 31 March 2025) the total return of both the B Income and C Accumulation share classes was 2.01%, compared to 0.14% for the IA Flexible Investment sector average.

Over the full accounting period (31 March 2024 to 31 March 2025), the total return of both the B Income and C Income share classes was 5.61%, compared to 2.92% for the IA Flexible Investment sector average.

The Sub-fund is ranked 23rd out of 161 funds available over the six months, 26th out of 160 over the accounting year and 57th out of 83 since launch, placing it in the first quartile of its sector over the first two periods, and in the third quartile since launch.

Source: FE Analytics. Total return. Bid to bid.

Market Review

Although inflation undoubtedly came down from its significantly higher peak of this cycle, it still appears to be struggling in some quarters to get back to the desired 2% target. Whilst goods inflation has been fairly well behaved, it is service inflation which has proven relatively stubborn. Wage increases and a strong labour market have left the consumer willing to continue to spend.

We now see divergence in terms of central bank response, however. Whilst inflation in the UK hit the 2% target, it began ticking up again once more, potentially making it more difficult for the Bank of England to cut rates significantly further. The US economy also proved resolute and, with inflation remaining above target, after initially thinking four to five cuts could be seen in 2025 this has reduced. In the euro area inflation followed a similar path to that seen in the UK, where it reached target before increasing again to sit just above target. Weaker economic growth here however, particularly in core economies such as Germany perhaps provides further scope for the European Central Bank to cut interest rates further.

Geopolitical factors also continued to weigh on markets, especially since Trump began his second term as US President. Tariffs were of course forefront, with the potential to reshape global trade and change the inflationary outlook, especially for goods. Relaxation of regulation, meanwhile, could prove a positive for economic growth and therefore corporate earnings. This could be especially pertinent in the financial sector, including banks, potentially increasing their ability to lend through relaxed capital adequacy ratios.

However, fiscal expansion, achieved through reduced taxation and other policies, has the potential to see the nation's debt rise substantially. This has connotations for growth, inflation and asset markets. The need to borrow more through an increased issuance of Treasuries is seeing investors demand a higher premium for the use of their capital.

We saw a great deal of divergence across equity market returns during the period in local currency terms. Within the UK, concerns regarding economic growth weighed on the performance of those stocks more heavily reliant on the domestic economy. This meant that both mid and small cap indices succumbed to weakness, with both in negative territory. Conversely, large cap stocks continued to power ahead, with the large cap index posting a return just under 6%. Stocks in the index typically derive a large proportion of their earnings from overseas, and it was also helped by its sector breakdown being more defensive than others. A low level of exposure to technology stocks finally proved a benefit rather than a hindrance.

US equities struggled during the period. Technology stocks were negative as sentiment towards the sector turned. A weaker outlook for economic growth weighed on the sector, which was compounded by high share valuations. After an initially strong period following the inauguration of Trump, smaller companies share prices also succumbed to weakness. The weaker outlook, changes in regulation looking like they will take longer to come through, along with the potential inflationary impact of tariffs, all weighed heavily as these stocks gave back all of their previous gains and then some.

The more defensive nature of the European equity markets in terms of sector breakdown, along with lower valuations, meant we saw a positive change in sentiment here, leading to outperformance against most other developed markets.

Portfolio Activity

The portfolio continues to provide a broad range of asset classes and geographical allocations.

Within the fixed income allocation the holding in GAM Star Credit Opportunities was sold down in favour of PIMCO GIS Income. Whilst the fundamentals remain positive for financials, we were conscious of the strong allocation to this sector by the GAM fund. Furthermore, the performance was closely correlated to TwentyFour Dynamic Bond, also allocated to within the Sub-fund. A greater level of diversification within the fixed income allocation was sought and the PIMCO fund provides this.

Another change saw the disposal of CRUX UK Special Situations. This followed the sale of the fund to another investment group. Whilst we continue to believe in the manager and their process this is now the second sale of the fund over a short space of time. We believe this erodes confidence and leads to assets under management shrinking.

The proceeds from this sale were invested into the WS Gresham House UK Smaller Companies. The manager seeks to identify companies which in their opinion have strong financial performance, established management teams, a sound market position and future growth potential. There is a focus on quality, cash generating businesses that are relatively insulated from external factors, thereby avoiding more cyclical areas.

Another change within the UK equity allocation saw a reduction in the holdings in Liontrust Special Situations and Schroder Recovery in favour of a new holding, Invesco UK Enhanced Index. This change helped to reduce the concentration of holdings within UK equities. Using the Invesco fund increased the allocation to large cap equities in a cost-efficient manner given the lower ongoing charge figure for this Sub-fund relative to actively managed funds in which exposure was reduced.

Within the US equity allocation a new holding was also added, being HSBC S&P 500 Equal Weight Equity Index. The level of concentration in the S&P 500 is now well known, along with the concentration of index returns coming from mega-cap stocks. To try and alleviate this issue this Sub-fund has been added, also tying in with the expectation that earnings growth in the US could broaden across different sectors in 2025.

As we moved into the new year, concerns over economic growth, coming from weaker published data, caused us to reduce exposure to funds with a large mid and/or small cap exposure. In the first instance we reduced exposure to the Vanguard Global Smaller Companies index. Whilst investing on a global basis, this Sub-fund has a strong bias to the US, where this weaker economic data had been seen. The remaining position in this Sub-fund was eventually fully liquidated later in the period.

On the same economic growth concerns the position in the Liontrust Special Situations was further reduced. This Sub-fund has a meaningful allocation to mid-cap stocks and also those listed on the FTSE AIM index, together accounting for just over half of the fund's assets. We also saw the retirement of one of the fund managers, Julian Fosh, which gave further reason to reduce the holding. Whilst Anthony Cross remains, supported by Victoria Stevens and Matt Tonge, Fosh had been co-manager on this fund for a long time and therefore will inevitably be a miss in terms of knowledge and experience.

Another fund where the allocation was reduced was RGI European. Here we also saw the fund manager depart, moving to Goodhart Partners. Despite the move, the manager will remain in tenure, with Goodhart acting as an investment adviser to the fund. The initial uncertainty surrounding this relationship however was enough to act upon. The fund also has exposure to mid-cap stocks and therefore the allocation was reduced on the same growth concerns.

In two other minor adjustments the exposure to Jupiter Merian Asia Pacific was reduced, recognising that it represented more than 5% of the Funds' assets under management and its relatively high ongoing charge figure of 1%. The exposure to the Carmignac Portfolio Long Short European Equities fund was also marginally reduced, with the overall exposure to alternatives having crept above the neutral level due to market movements.

The Sub-fund saw net outflows during the period which were funded by reducing existing holdings when needed, allowing the adjustment of allocations at the same time.

Outlook

Geopolitics often has an impact on the direction of the economy and financial markets but the degree to which it does ebbs and flows. Since 'Liberation Day', when President Trump announced global tariffs the US would look to impose on trading partners, we have and continue to live in a heightened state of uncertainty. Since the initial announcement we have seen tariffs imposed, paused, trade deals agreed, and now we see US rulings declaring global tariffs as being illegal. How they look in the future remains unknown.

For the global economy and markets, it's not just the outcome that matters but also the effect of the uncertainty on consumer and business confidence. The imposing of tariffs has the potential to significantly disrupt global trade. For a prolonged period of time we have been in a state of globalisation. Tariffs have the potential to bring this to a halt and, through protectionism, actually put it into a state of reverse. All have the potential to make economic growth stall, at least in the short term.

As well as growth, there is also the potential impact on inflation, at least over the short term. Tariffs will only add to the price of imported goods. One main reason why certain goods are imported into a country in the first place is a lower pricing point. Even if it does encourage domestic production in the long run, there is the chance that it will be more expensive. Business confidence has certainly been scarred in the short term, until more is known and the outlook is clearer.

Amidst this uncertainty the portfolio remains well diversified across asset classes, including equities, fixed income and alternatives. Within the equity allocation, exposure is taken across different geographies, investment styles and processes. An overweight position is maintained here until we start to see a meaningful negative impact on earnings from a potential economic slowdown.

Whilst the all in yield from fixed income remains attractive, we recognise that credit spreads remain tight relative to history. Higher inflation could return, being the enemy of the asset class, and coupled with expected additional supply, given deficits being ran by many different governments, this prevents us taking an overweight position for now. Exposure to alternatives meanwhile, provide an uncorrelated source of return and protection when we see a downturn in markets.

Lowes Investment Management

June 2025

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 Diversified Strategy Fund ("The Fund") Class B Accumulation Shares

This is a sub fund of MI Bespoke Funds ICVC. The Fund is an Open Ended Investment Company.
ISIN: GB00BVVQ7G83.
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 objective of the Fund is to achieve long term capital growth.

The Fund intends to meet its objectives through exposure to a combination of equities, fixed interest and structured products. The majority of the Fund's exposure will be to equities. It may also have exposure to property. With the exception of structured products, this exposure will be through investment in OEICs, unit trusts, investment trusts, Exchange Traded Funds and other collective investment schemes across several management groups. It may also invest in equities from the world's major markets, bonds and other transferable securities.

The Fund has no specific limits on exposures to any asset class, geographic area, industry or economic sectors.

The Fund will only use derivatives (financial instruments whose value is linked to the rise and fall of other assets) for the purposes of efficient portfolio management, with the aim of managing risk and cost.

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.

Typically lower rewards, lower risk — **Typically higher rewards, higher risk**

1	2	3	4	**5**	6	7

- 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:
- Counterparty risk: The Fund can conclude various transactions with contractual partners. If a contractual partner becomes insolvent, it can no longer or can only partly settle unpaid debts owed to the Fund.
- Market risk: External factors can cause an entire asset class to decline in value which would result in a decrease in the value of investments.
- Currency risk: As the Fund invests in overseas securities, movements in exchange rates, when not hedged, may cause the value of investments to increase or decrease.
- For further risk information please see the prospectus.

MI Diversified Strategy 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	1.20%

Charges taken from the Fund under specific conditions	
Performance fee	NONE

- The ongoing charges figure is estimated because the share/unit class is relatively new and has insufficient track record for us to calculate it exactly. The ongoing charges figure may vary from year to year and will exclude the costs of buying or selling assets for the Fund (unless these assets are shares of another fund).
- For the ongoing charges, the figure is at 30 September 2023.
- You may also be charged a dilution levy on entry 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

There is insufficient data to provide a useful indication of past performance to investors.

- Fund launch date: 06/05/2015.
- The share/unit class has not yet been launched.

Practical information

- This document is issued by Apex Fundrock Ltd and contains information on the Class B 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 shares and other share 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 also call us on 0345 026 4281, 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.