

For professional advisers only

Brooks Macdonald

Our Value Assessment

April 2023



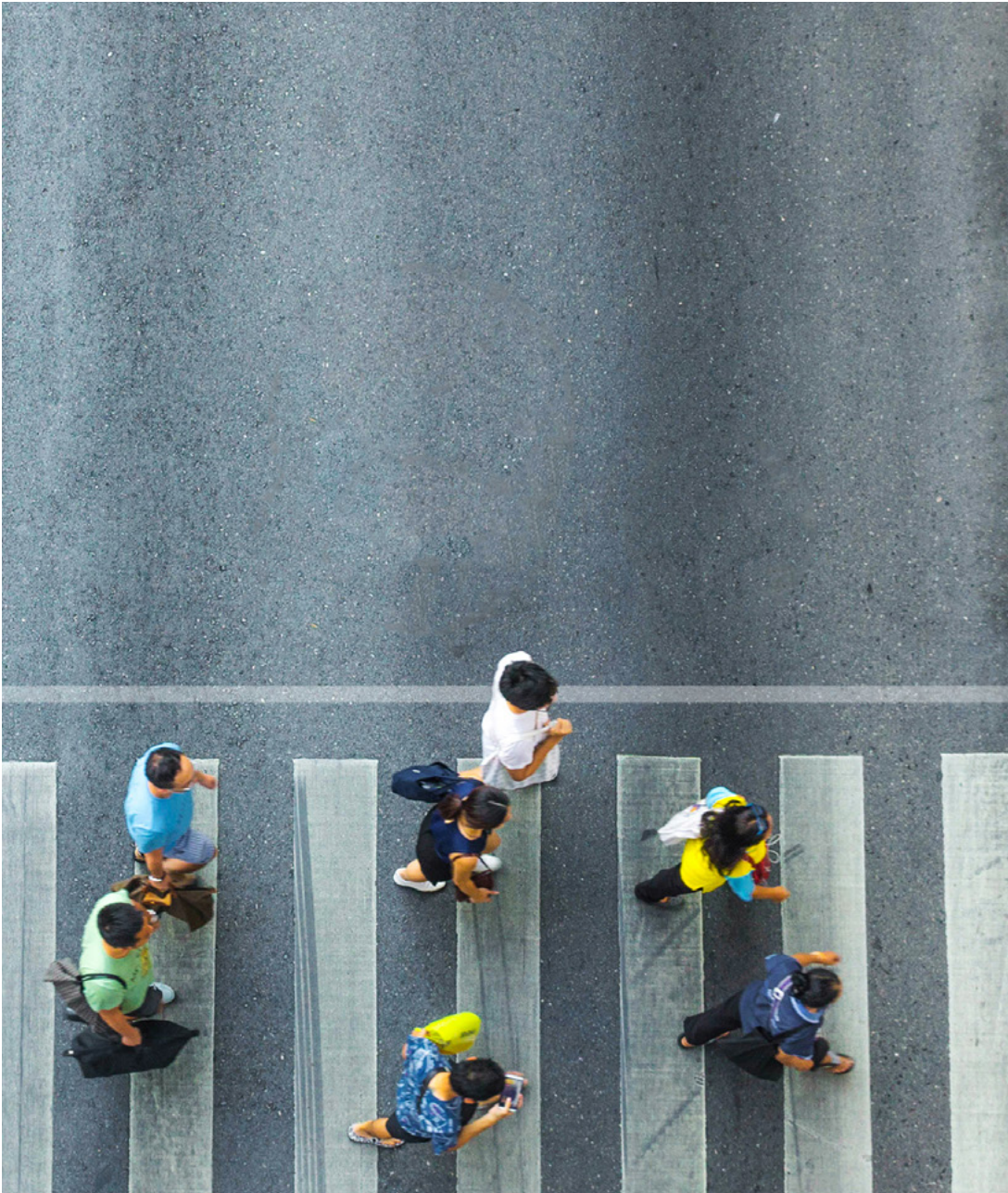
BROOKS MACDONALD



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Introduction

Dear Adviser,

On behalf of the Brooks Macdonald Board of Directors, thank you for reading our first Value Assessment Report.

Under new Consumer Duty rules, the Financial Conduct Authority (FCA) now requires all wealth managers to complete an annual value assessment for each product and service that we manage.

The value assessment process is an important part of Consumer Duty and a commitment that we take very seriously as part of our regulatory responsibilities. The new duty makes it even more vital that advisers have the tools they need to deliver

for clients. Our value assessment is intended to boost information flow across the distribution chain.

The FCA defines 'value' as the relationship between the overall price the client pays for products or services and the benefits they are likely to receive. There is more detail in this report on the methodology behind our value assessment, alongside our key findings. Our goal is not just to simply meet the requirements of Consumer Duty, we want to keep improving the value we provide to clients, and we set out in this report exactly how we will do that.

The new duty also requires advisers

to recommend products in line with their intended target markets. This requires information on identified target markets and distribution strategies. You can find this document [on our website here](#).

We greatly appreciate you choosing to invest with Brooks Macdonald and we are here to support you with all your Consumer Duty requirements.

Yours sincerely

John Linwood

*Consumer Duty Champion
& Non-Executive Director
Brooks Macdonald*

The information in this document is intended to help professional advisers meet the new Consumer Duty price and value requirement.



Our approach to value assessments

For the purposes of Consumer Duty rules, Brooks Macdonald is a manufacturer of the investment services included in this guide.

Under Consumer Duty, the FCA expects a high level of communication and ongoing rapport between manufacturers such as Brooks Macdonald and professional advisers (distributors), to allow parties at all levels of the value chain to be able to assess that the products they create, offer or advise on, and demonstrate that they are delivering good outcomes for clients.

This means sharing all relevant information with you about our products and services such as this value assessment and any other information necessary for you to understand the characteristics of the product, as well as sufficient information for the you to understand whether the product is suitable for any potentially vulnerable clients.

The value assessment is designed to make sure that your clients pay a fair price for our products and services. We will make sure that our prices are fair in relation to the:

- Key features and benefits of the product or service.
- Quality of service your client receives.
- Performance of the product or service.
- Price of comparable products or services.
- Costs we incur to deliver the product or service.

For distributors utilising Brooks Macdonald Investment Solutions (BMIS), Brooks Macdonald is acting as manufacturer of investment services. As BMIS is a consultation function the additional features and benefits (beyond those detailed in each investment service value assessment) may include support from the dedicated investment solutions team and co-branded marketing materials and factsheets.

The report covers our assessment as at 30 April 2023.

Assessment of financial instruments

Where our services invest in third party funds, we assess the compatibility of these with the needs of end clients. Assessments include consideration of the clients' risk appetite, the impact of costs and charges, and the financial strength of any product manufacturers. We also consider manufacturers' defined target markets and the knowledge of our client base.

To ensure that financial instruments distributed to clients are fully understood, our investment managers are required to complete detailed due diligence on investments. For all instruments used within our Centralised Investment Process, this due diligence is reviewed and approved by the Asset Selection Committee. For further information on the details of our due diligence processes for financial instruments, please refer to our [Standard Due Diligence Questionnaire](#).

We will obtain detail from manufacturers on the outcome of their value assessment to be satisfied that the investments included in our portfolios provide fair value.

In instances where adequate information is not publicly available from the manufacturer, we undertake additional due diligence to ensure that the target market can be determined with sufficient granularity.

Vulnerable clients

Across all our products and services, we have processes in place to ensure clients with characteristics of vulnerability are not disadvantaged.

We have policies in place to ensure:

- The needs of vulnerable clients are taken into account, and that they receive fair outcomes.
- A consistent approach to consumer vulnerability is understood and embedded across all areas of the business.
- Staff receive the required training, guidance and support to identify vulnerable clients and provide them with the additional levels of care required.

We appreciate that vulnerable clients may have needs that are more challenging and complex than the average client. Where vulnerabilities are identified, our staff will respond in a considered and tailored way and facilitate the necessary arrangements to assist them. For example:

- Flexibility in the applications of our policies and procedures where appropriate.
- Flexibility around appointment locations (for example, a client's home), times of day and meeting duration. We also consider accessibility of our office for those clients with health conditions/disabilities.
- Providing clients with a choice of ways of communicating. This could relate to the method of communication (e.g. audio/ face-to-face/ digital) or the service delivery (e.g. agreement to talk at a particular time of day depending on carers and medication /providing information in advance of meetings).
- Providing clients with accessible and simple communications to support the client to understand product and services.
- Offering clients, the option of having a third party to support them at a meeting.

We also have provided resources on our website to help advisers tackle the issues behind client vulnerability.



Our methodology

Key features and benefits

We have considered the key features and benefits of our discretionary investment management services as they relate to four key areas, and the extent to which the service has the capacity to deliver individually for a client.

- **Investment mandate** – breadth of options and degree of flexibility for clients in terms of their required investment objective(s), risk profile, and specific investment preferences/restrictions.
- **Investment universe** – nature and scope of economic and securities research and analysis required to deliver the investment mandate.
- **Client updates and information** – regular reporting, digital access, contact with our investment personnel/teams, and approach to ad hoc queries that your clients can expect.
- **Custody and administration** – extent to which we undertake such activities on your client's behalf.

Quality of service

We greatly value our clients' satisfaction, and all feedback helps us to keep refining the services we provide.

Market research services, such as Defaqto, carry out detailed independent assessments of many of our services. Defaqto also conduct an annual satisfaction survey of financial advisers who use our products and services, and Aon have carried out equally detailed satisfaction surveys with our private clients.

We also consider a variety of internal metrics as an indicator of client satisfaction including:

- The number and nature of client complaints.
- Client tenure and asset flows.

Performance

While investment returns are not guaranteed, we believe it is reasonable for your clients to expect us to deliver competitive performance over the medium to long term.

We believe the value we add is in the outperformance of our investment services relative to market benchmarks or peer groups. We have assessed rolling five-year historic returns on a quarterly basis for the available full track record, and have reviewed the proportion of data points where our portfolios have outperformed to evidence consistency. We have used total returns, net of fees.

Where applicable we have relied on independent data and analysis from providers such as Asset Risk Consultants (ARC), who create Private Client Indices and publish quarterly reports, and Morningstar.

For additional data and information about the historic performance of our investment management products and services, please refer to the [factsheets and literature available on our website](#).

The bespoke nature of some services means that some clients will also benefit financially from tax efficiencies through our discretionary active management of product wrappers and tax allowances.



Price

We have considered the total cost of our discretionary investment management services to clients with reference to key components:

- **Investment service fees** – the fees we charge for providing clients with the investment service. This includes any initial fee, annual management charge, transaction charges, foreign exchange charges (for non-sterling transactions).
- **Underlying product charges** – the costs of manufacturing and managing the underlying investments, e.g. funds, where costs are taken directly from these investments, includes one-off charges, ongoing charges, transaction charges, incidental costs.
- **Other administrative charges** – associated with specific administrative activities, includes for stock transfers, chaps payments, historic valuations and probate services, Lifetime ISA withdrawals.

Whilst we have not included any costs associated with advice, we have taken into consideration in our value assessments that our discretionary services are sold via financial advisers who will charge fees for advice in addition to our fees.

We have also considered our investment service fees and the total cost to clients of our services in the context of the fees and costs charged by a selection of other UK discretionary investment management firms who provide similar services.

Where available we have relied on data and analysis conducted by independent research agencies such as Platforum. Where independent research is not available to us, we have undertaken our own analysis based on publicly available information sourced from providers' websites.

We have also assessed the rates that our existing clients are currently paying and how that aligns with expectations based on our published pricing approach and rate cards.

For full details on our charges for our services, please contact your Brooks Macdonald representative or email us at info@brooksmacdonald.com.

Costs

We have considered both the direct and indirect costs that Brooks Macdonald incur to deliver our discretionary investment management services to clients. These include:

- People who work exclusively to deliver the service e.g. Investment Managers, Portfolio Assistants and Administrators.
- People who support the provision of the range of services, e.g. Investment research and analysis, risk oversight and management, sales and marketing.
- Standard business overheads such as outsourced administration activities, technology and office costs, and other ancillary costs required to deliver our services.

Our overall findings

Our assessment has concluded that your clients are paying a fair price for our products and services.

- **Key features and benefits** – we have found that the range of features and benefits of our discretionary investment management services can meet a broad variety of client needs, providing a quality investment solution and ultimate peace of mind for clients.
- **Quality of service** – overall our service is of a good quality, with high levels of satisfaction and a low number of client complaints.
- **Performance** – has been delivered over the medium to long term for our investment services, where any service has underperformed, we have provided an explanation of the market conditions which have impacted performance in our findings.
- **Price** – our charges and fee structures were found to be reasonable and appropriate for clients and are in line with other comparable services in the market.
- **Costs** – we have found that they are reflective of the cost to deliver the service and are effectively managed at a corporate level.

Next steps

We recognise that each of our clients has their own distinct needs and desired outcomes, and with this in mind, we are continually looking for ways to enhance our investment products and services.

Over the coming year we will introduce further adviser feedback questionnaires to better understand what you and your clients value most in your relationship with Brooks Macdonald, and how we can adapt our services and product offering to best meet your needs. We will continue to review the range of management information we collate so we can provide the best quality of service to clients.

We will continue to test our operational and marketing materials with clients and professional advisers to ensure that our documentation is relevant, clear and appropriate. To keep you well informed about our portfolios we also intend to further refresh and enhance our marketing materials and market outlooks.

We are currently in the process of conducting a separate, comprehensive review of pricing across our range of discretionary products and services. Our findings from this value assessment will be considered as part of that work.

We hope that these initiatives will help to enhance our reporting of value over time and we would welcome any feedback you might have on this inaugural value assessment.



Bespoke Portfolio Service (BPS)

Key features and benefits

This service is designed for clients who want an individual investment portfolio tailored to their personal requirements. It is offered on a discretionary basis, which means that a dedicated investment manager will make investment decisions on your client's behalf, using their knowledge and expertise.

The benefits:

- **Investment mandate** - your client's investment mandate will be tailored to meet their individual requirements. Your client's portfolio will be optimised, making use of appropriate tax wrappers and allowances.
- **Investment universe** - your client's portfolio is actively managed by an investment manager who leverages our centralised investment process which involves research and analysis across multiple asset classes and geographies to inform our house view and securities buylists.
- **Client updates and information** - your client will receive a comprehensive personal portfolio valuation on a quarterly basis, an annual review, and access to InvestBM, an online portal, which provides up to date portfolio valuations, a record of all transactions and tools to analyse and understand specific holdings. Your client also has direct access to their investment manager and a local support team who are responsible for all ongoing administration of your client's portfolio and are available to respond to any of your clients' questions or requests.
- All new clients are provided with a personal investment proposal which considers their individual circumstances and requirements.
- **Custody and administration** - your clients' assets will be held in our custody and we will be responsible for all administration activity associated with their portfolio.



Given the range of benefits and bespoke nature of this service, we believe it can meet a broad variety of needs, providing a comprehensive investment solution and ultimate peace of mind for clients.

Quality of service

For 2023, Defaqto has assessed and awarded our Bespoke Portfolio Service a five star rating, the highest available. In addition, Defaqto's annual satisfaction survey showed Brooks Macdonald ranked in the top 5 as a preferred provider for DFM services amongst financial advisers.

The number of client complaints we have received remains very low, though there has been a slight rise following a recent digital upgrade within the business. Ultimately this digital transformation will strengthen our business and provide an improved service for our clients, but we appreciate the stress that change can cause, and we are working to make the transition across to our new systems as smooth as possible, for all involved.

The majority of our BPS clients have been with us for at least seven years and over two thirds have been with us for at least five years.

We believe that clients' satisfaction with this service is good. We will continue to closely monitor our management information so we can provide a high quality of service to clients.

Performance

Assessment of the performance of BPS portfolios relative to the ARC Private Client Indices shows:

- Client portfolios with a high risk allocation have consistently outperformed the peer group average on a five year rolling basis.
- Client portfolios with low, low to medium, and medium risk allocations have outperformed the peer group average on a five year rolling basis over 70% of the time.
- Client portfolios with a medium to high risk allocation have outperformed the peer group average on a five year rolling basis around 50% of the time.

We acknowledge that sometimes portfolios will underperform during points in the investment cycle given their particular investment style. For additional data and information about the historic performance of our investment management products and services, please refer to the factsheets and literature available on our website.

The bespoke nature of this service means that some clients will also benefit financially from tax efficiencies through our discretionary active management of product wrappers and tax allowances.

Source: Brooks Macdonald and Asset Risk Consultants (ARC), as at December 2022

Price

The service has a flexible pricing structure to accommodate the breadth of the offering and to ensure individual clients pay a fair rate.

Given the bespoke nature of the service, the current pricing approach means that clients will pay an appropriate investment service fee rate for their circumstances, on the basis of volume of both assets and anticipated transactional activity. For example, clients with large portfolios will not pay high nominal fees that cannot be justified by a commensurately larger management burden for Brooks Macdonald, and portfolios with less frequent or less voluminous trading are not paying unjustifiable costs associated with dealing activity.

Entry and exit fees are not typically charged for this service. Additional administrative costs are only levied when specific events that warrant them occur.

As this service invests significantly in third party funds, a material part of the total cost to clients will be the underlying product charges levied and collected by the fund manager. We actively monitor these costs and endeavour to ensure we get competitive rates.

In the context of Brooks Macdonald's full range of investment products and services, this service has a higher cost to clients than others offered by Brooks Macdonald.

We have compared the total cost to clients of this service with other firms offering a similar service and found ours to be in line with our peers.

Given the bespoke nature of the service, it is expected that clients will pay different levels of fees. We have reviewed the actual rates paid by clients of the service to ensure the degree of dispersion amongst clients is in line with our expectations. Where we have identified any outliers paying higher than expected fees, we have taken action.

We regularly review our charges and fee structures to ensure that they are reasonable and appropriate for clients. We are currently in the process of conducting a separate, comprehensive review of pricing across our range of discretionary products and services. Our findings from this value assessment will be considered as part of that work.

Costs

A significant proportion of the total cost to Brooks Macdonald of delivering this service is the staff costs associated with providing clients with a comprehensive range of investment benefits with individual portfolio tailoring, and full servicing and administration. In the context of Brooks Macdonald's full range of investment products and services, the service has a higher cost to deliver.

Effective management of costs is a key requirement for providing value to clients. We will continue to closely monitor the costs we incur to deliver this service and will seek to pass on any savings or reinvest back into our business to enhance the investment services we provide to clients.

Conclusion

We believe the total cost to clients of the Bespoke Portfolio Service is proportionate and fair in the context of its total benefits and that the service represents value for money for clients.

Decumulation Service

Key features and benefits

The is a specialist service designed for clients who want an individual investment portfolio tailored to their personal requirements and who are approaching a particular phase in life where they are no longer accumulating wealth and are relying on their investments and savings to generate a required level of income, for example retirement. This service is offered on a discretionary basis, which means that a dedicated investment manager will make investment decisions on your client's behalf, using their knowledge and expertise.

The benefits:

- **Investment mandate** – your client's investment mandate will be tailored to meet their individual requirements. This will involve delivering a regular income from their portfolio, at the yield and frequency required by the client. Your client's portfolio will be optimised, making use of appropriate tax wrappers and allowances.
- **Investment universe** – your client's portfolio is actively managed by an investment manager who leverages our centralised investment process which involves research and analysis across multiple asset classes and geographies to inform our house view and securities buylists.
- **Client updates and information** – your client will receive a comprehensive personal portfolio valuation on a quarterly basis, an annual review, and access to InvestBM, an online portal, which provides up to date portfolio valuations, a record of all transactions and tools to analyse and understand specific holdings. Your client also has direct access to their investment manager and a local support team who are responsible for all ongoing administration of your client's portfolio and are available to respond to any of your clients' questions or requests.
- All new clients are provided with a personal investment proposal which considers their individual circumstances and requirements.
- **Custody and administration** – your clients' assets will be held in our custody and we will be responsible for all administration activity associated with their portfolio.



Given the range of benefits and bespoke nature of this service, we believe it can meet a broad variety of needs, providing a comprehensive investment solution and ultimate peace of mind for clients.

Quality of service

While Defaqto do not specifically review the Decumulation Service, for 2023, they have assessed our DFM services generally and awarded us a gold rating, the highest available. In addition, Defaqto's annual satisfaction survey showed Brooks Macdonald ranked in the top 5 as preferred provider for DFM services amongst financial advisers.

The number of client complaints we have received remains very low, but there has been a slight rise following a recent digital upgrade within the business. Ultimately this digital transformation will strengthen our business and provide an improved service for our clients, but we appreciate the stress that change can cause, and we are working to make the transition across to our new systems as smooth as possible, for all involved.

This is a relatively new service, launched in 2017, and has attracted positive net flows over the last three years.

We believe that clients' satisfaction with this service is good. We will continue to closely monitor our management information so we can provide a high quality of service to clients.

Performance

Due to the separate, bespoke short-term portfolio in our Decumulation solution we are unable to provide benchmarked performance at an overall service level. The long-term portfolio in our Decumulation solution and our standard BPS are managed to the same overall risk levels. Assessment of the performance of BPS portfolios relative to the ARC Private Client indices shows:

- Client portfolios with a high risk allocation have consistently outperformed the peer group average on a five year rolling basis.
- Client portfolios with low, low to medium, and medium risk allocations have outperformed the peer group average on a five year rolling basis over 70% of the time.
- Client portfolios with a medium to high risk allocation have outperformed the peer group average on a five year rolling basis around 50% of the time.

We acknowledge that sometimes portfolios will underperform during points in the investment cycle given their particular investment style. For additional data and information about the historic performance of our investment management products and services, please refer to the factsheets and literature available on our website.

The bespoke nature of this service means that some clients will also benefit financially from tax efficiencies through our discretionary active management of product wrappers and tax allowances.

Source: Brooks Macdonald and Asset Risk Consultants (ARC), as at December 2022

Price

The service has a flexible pricing structure to accommodate the breadth of the offering and to ensure individual clients pay a fair rate.

Given the bespoke nature of the service, the current pricing approach means that clients will pay an appropriate investment service fee rate for their circumstances, on the basis of volume of assets. For example, clients with large portfolios will not pay high nominal fees that cannot be justified by a commensurately larger management burden for Brooks Macdonald.

Entry and exit fees are not typically charged for this service. Additional administrative costs are only levied when specific events that warrant them occur.

As this service invests significantly in third party funds, a material part of the total cost to clients will be the underlying product charges levied and collected by the fund manager. We actively monitor these costs and endeavour to ensure we get competitive rates.

In the context of Brooks Macdonald's full range of investment products and services, this service has a higher cost to clients than others offered by Brooks Macdonald.

Given the specialist nature of this service, there are limited comparable products in the market. We have compared the total cost to clients of our standard BPS service with other firms offering a similar service and found ours to be in line with our peers.

Given the bespoke nature of the service, it is expected that clients will pay different levels of fees. We have reviewed the actual rates paid by clients of the service to ensure the degree of dispersion amongst clients is in line with our expectations.

We regularly review our costs and fee structures to ensure that they are reasonable and appropriate for clients. We are currently in the process of conducting a separate, comprehensive review of pricing across our range of discretionary products and services. Our findings from this value assessment will be considered as part of that work.

Costs

A significant proportion of the total cost to Brooks Macdonald of delivering this service is the staff costs associated with providing clients with a comprehensive range of investment benefits with individual portfolio tailoring, and full servicing and administration. In the context of Brooks Macdonald's full range of investment products and services, the service has a higher cost to deliver.

Effective management of costs is a key requirement for providing value to clients. We will continue to closely monitor the costs we incur to deliver this service and will seek to pass on any savings or reinvest back into our business to enhance the investment services we provide to clients.



Conclusion

We believe the total cost to clients of the Decumulation Service is proportionate and fair in the context of its total benefits and that the service represents value for money for clients.

BPS Responsible Investment Service (RIS): Advance and Avoid Strategies

Key features and benefits

This service is designed for clients who want an individual responsible investment portfolio tailored to their personal requirements. It is offered on a discretionary basis, which means that a dedicated investment manager will make investment decisions on your client's behalf, using their knowledge and expertise.

The benefits:

- **Investment mandate** - your client's investment mandate will be tailored to meet their individual requirements. Your client's portfolio will be optimised, making use of appropriate tax wrappers and allowances. The investment manager will follow a responsible investment strategy, either investing in actively managed funds that aim to advance businesses that provide solutions to sustainability issues, or have strong corporate policies and outputs relating to ESG criteria (Advance) or that restrict investment into sectors that do not align with client values e.g. exclusionary criteria for armaments, gambling, tobacco, alcohol and pornography (Avoid).
- **Investment universe** - your client's portfolio is actively managed by an investment manager who leverages our centralised investment process which involves research and analysis across multiple asset classes and geographies to inform our house view and securities buylists.
- **Client updates and information** - your client will receive a comprehensive personal portfolio valuation on a quarterly basis, an annual review, and access to InvestBM, an online portal, which provides up to date portfolio valuations, a record of all transactions and tools to analyse and understand specific holdings. Your client also has direct access to their investment manager and a local support team who are responsible for all ongoing administration of your client's portfolio and are available to respond to any of your clients' questions or requests.
- All new clients are provided with a personal investment proposal which considers their individual circumstances and requirements.
- A dedicated [Responsible Investment Hub](#) available on our website and we also publish a RIS report on a biannual basis.
- **Custody and administration** - your clients' assets will be held in our custody and we will be responsible for all administration activity associated with their portfolio.



Given the range of benefits and bespoke nature of this service, we believe it can meet a broad variety of needs, providing a comprehensive investment solution and ultimate peace of mind for clients.

Quality of service

While Defaqto do not specifically review the BPS Responsible Investment Service, for 2023, they have assessed our DFM services generally and awarded us a gold rating, the highest available. In addition, Defaqto's annual satisfaction survey showed Brooks Macdonald ranked in the top five as preferred provider for DFM services amongst financial advisers.

The number of client complaints we have received remains very low, but there has been a slight rise following a recent digital upgrade within the business. Ultimately this digital transformation will strengthen our business and provide an improved service for our clients, but we appreciate the stress that change can cause, and we are working to make the transition across to our new systems as smooth as possible, for all involved.

This is a relatively new service, launched in 2018, and has attracted positive net flows over the last three years.

We believe that clients' satisfaction with this service is good. We will continue to closely monitor our management information so we can provide a high quality of service to clients.

Performance

Due to the short track record of the BPS Responsible Investment Service we are unable to provide benchmarked performance at the service level. While underlying investments are different, the RIS portfolios and our standard BPS are managed to the same overall risk levels. Assessment of the performance of BPS portfolios relative to the ARC Private Client indices shows:

- Client portfolios with a high risk allocation have consistently outperformed the peer group average on a five year rolling basis.
- Client portfolios with low, low to medium, and medium risk allocations have outperformed the peer group average on a five year rolling basis over 70% of the time.
- Client portfolios with a medium to high risk allocation have outperformed the peer group average on a five year rolling basis around 50% of the time.

We acknowledge that sometimes portfolios will underperform during points in the investment cycle given their particular investment style. For additional data and information about the historic performance of our investment management products and services, please refer to the factsheets and literature available on our website.

The bespoke nature of this service means that some clients will also benefit financially from tax efficiencies through our discretionary active management of product wrappers and tax allowances.

Source: Brooks Macdonald and Asset Risk Consultants (ARC), as at December 2022

Price

The service has a flexible pricing structure to accommodate the breadth of the offering and to ensure individual clients pay a fair rate.

Given the bespoke nature of the service, the current pricing approach means that clients will pay an appropriate investment service fee rate for their circumstances, on the basis of volume of both assets and anticipated transactional activity. For example, clients with large portfolios will not pay high nominal fees that cannot be justified by a commensurately larger management burden for Brooks Macdonald, and portfolios with less frequent or less voluminous trading are not paying unjustifiable costs associated with dealing activity.

Entry and exit fees are not typically charged for this service. Additional administrative costs are only levied when specific events that warrant them occur.

As this service invests significantly in third party funds, a material part of the total cost to clients will be the underlying product charges levied and collected by the fund manager. We actively monitor these costs and endeavour to ensure we get competitive rates.

In the context of Brooks Macdonald's full range of investment products and services, this service has a higher cost to clients than others offered by Brooks Macdonald.

Given the specialist nature of this service, there are limited comparable products in the market. We have compared the total cost to clients of our standard BPS service with other firms offering a similar service and found ours to be in line with our peers.

Given the bespoke nature of the service, it is expected that clients will pay different levels of fees. We have reviewed the actual rates paid by clients of the service to ensure the degree of dispersion amongst clients is in line with our expectations.

We regularly review our costs and fee structures to ensure that they are reasonable and appropriate for clients. We are currently in the process of conducting a separate, comprehensive review of pricing across our range of discretionary products and services. Our findings from this value assessment will be considered as part of that work.

Costs

A significant proportion of the total cost to Brooks Macdonald of delivering this service is the staff costs associated with providing clients with a comprehensive range of investment benefits with individual portfolio tailoring, and full servicing and administration. In the context of Brooks Macdonald's full range of investment products and services, the service has a higher cost to deliver.

Effective management of costs is a key requirement for providing value to clients. We will continue to closely monitor the costs we incur to deliver this service and will seek to pass on any savings or reinvest back into our business to enhance the investment services we provide to clients.



Conclusion

We believe the total cost to clients of the BPS Responsible Investment Service is proportionate and fair in the context of its total benefits and that the service represents value for money for clients.



AIM (Alternative Investment Market) Portfolio Service

Key features and benefits

This is a specialist service that provides clients with exposure to a carefully selected portfolio of AIM listed companies. Your clients can derive potential Inheritance Tax (IHT) benefits from the service via the UK's Business Relief for Inheritance Tax policy, which seeks to encourage investment in certain qualifying companies by providing investors with an IHT exemption after two years of ownership. It is offered on a discretionary basis, which means that a dedicated investment manager will make investment decisions on your client's behalf, using their knowledge and expertise.

The benefits:

- **Investment mandate** - your client's investment mandate will be specifically focussed on supporting their inheritance planning financial objectives.
- **Investment universe** - your client's portfolio is actively managed by a team of discretionary investment managers who undertake specialist research in AIM-listed companies which are eligible for Business Relief.
- **Client updates and information** - your client will receive a comprehensive personal portfolio valuation on a quarterly basis and access to InvestBM, an online portal, which provides up to date portfolio valuations, a record of all transactions and tools to analyse and understand specific holdings.
- **Custody and administration** - your clients' assets will be held in our custody and we will be responsible for all administration activity associated with their portfolio.



Given the range of benefits and specialist nature of this service, we believe it can meet a specific need, providing a professional investment solution for clients.

Quality of service

While Defaqto do not specifically review the AIM Portfolio Service, for 2023, they have assessed our DFM services generally and awarded us a gold rating, the highest available. In addition, Defaqto's annual satisfaction survey showed Brooks Macdonald ranked in the top 5 as preferred provider for DFM services amongst financial advisers.

The number of complaints we receive from clients in our AIM service remains very low, but there has been a slight rise following a recent digital upgrade within the business. Ultimately this digital transformation will strengthen our business and provide an improved service for our clients, but we appreciate the stress that change can cause, and we are working to make the transition across to our new systems as smooth as possible, for all involved.

The majority of AIM clients have been with us for at least four years and over two thirds of our clients have been with us for at least three years.

We believe that clients' satisfaction with this service is good. We will continue to closely monitor our management information so we can provide a high quality of service to clients.

Performance

Assessment of the performance of AIM portfolios relative to the ARC Private Client index shows that they have outperformed the peer group average on a five year rolling basis over 85% of the time.

Additional financial benefit is provided by this service as assets are exempt from IHT (payable at 40%) if held for minimum of two years.

Source: Brooks Macdonald and Asset Risk Consultants (ARC), as at December 2022

Tax treatment depends on your clients' individual circumstances and may be subject to change in the future. There is no guarantee that the tax efficient nature of any investment will remain. Brooks Macdonald does not provide tax advice and independent professional advice should be sought.

Price

The service has a flexible pricing structure to ensure individual clients pay a fair rate.

Given the standardised nature of the service, the current pricing approach means that clients will typically pay a similar investment service fee rate. There is a degree of flexibility to ensure clients with large portfolios will not pay high nominal fees that cannot be justified by a commensurately larger management burden for Brooks Macdonald, and portfolios with less frequent or less voluminous trading are not paying unjustifiable costs associated with dealing activity.

Entry and exit fees are not typically charged for this service. Additional administrative costs are only levied when specific events that warrant them occur.

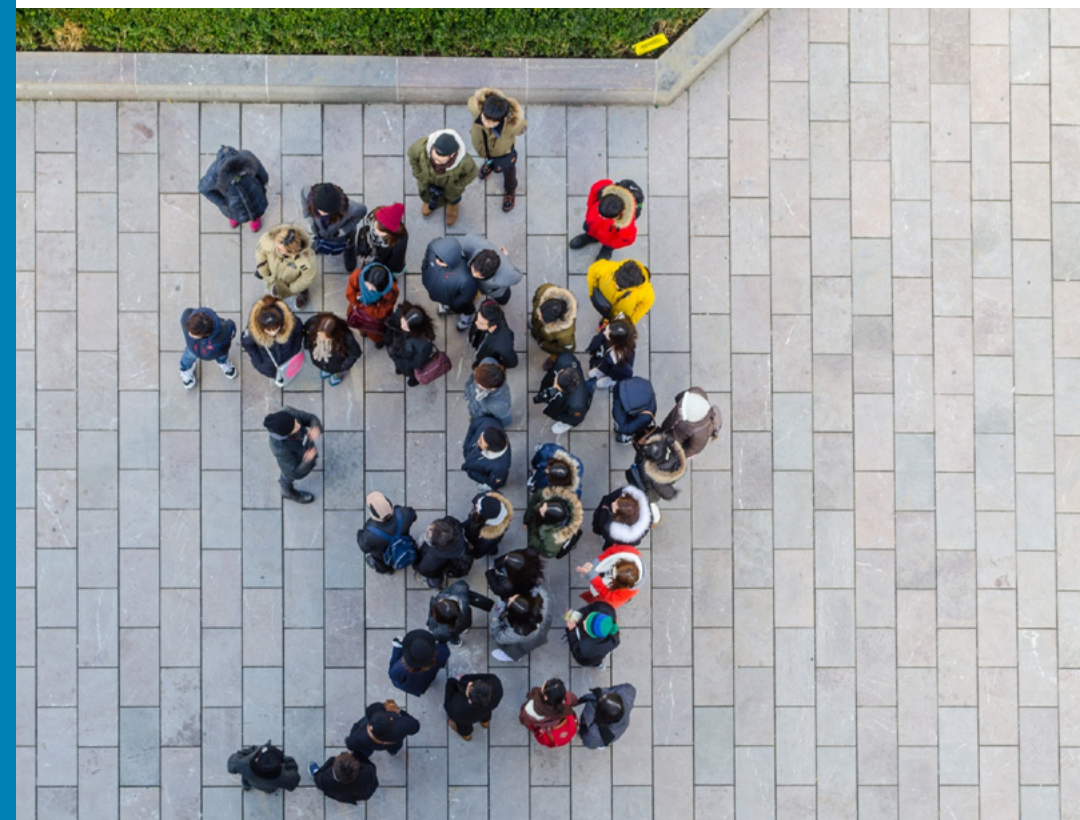
As this service invests directly in equities the additional underlying product costs associated with investment in third party funds does not apply.

In the context of Brooks Macdonald's full range of investment products and services, this service has a higher cost to clients than others offered by Brooks Macdonald.

We have compared the total cost to clients of this service with other firms offering a similar service and found ours to be in line with our peers.

Given the standardised nature of the service, it is expected that clients will pay a similar level of fees. We have reviewed the actual rates paid by clients of the service to ensure the dispersion is in line with our expectations. Where we have identified any outliers paying higher than expected fees, we have taken action.

We regularly review our costs and fee structures to ensure that they are reasonable and appropriate for clients. We are currently in the process of conducting a separate, comprehensive review of pricing across our range of discretionary products and services. Our findings from this value assessment will be considered as part of that work.



Costs

A significant proportion of the total cost to Brooks Macdonald of delivering this service is the staff costs associated with providing clients with specialist investment benefits, and full servicing and administration. In the context of Brooks Macdonald's full range of investment products and services, the service has a moderate cost to deliver.

Effective management of costs is a key requirement for providing value to clients. We will continue to closely monitor the costs we incur to deliver this service and will seek to pass on any savings or reinvest back into our business to enhance the investment services we provide to clients.

Conclusion

We believe the total cost to clients of the AIM Portfolio Service is proportionate and fair in the context of its total benefits and that the service represents value for money for clients.

Managed Portfolio Service (MPS): Active, Passive and Responsible Investment Strategies

Key features and benefits

This is a managed portfolio service that provides clients with a choice of 15 model portfolios that are managed to specific investment objectives and risk levels, and using active, passive or responsible investment strategies. It is offered on a discretionary basis, which means that a team of investment managers will make investment decisions at a model level, using their knowledge and expertise.

The benefits:

- **Investment mandate** – each model portfolio has a specific investment objective and risk profile, the range of models available meet a variety of client needs including growth and/or income over five risk levels. The investment managers will follow the associated investment strategy of the model, investing in either actively managed funds, passively managed funds, or actively managed funds that aim to advance businesses that provide solutions to sustainability issues, or have strong corporate policies and outputs relating to ESG criteria.
- **Investment universe** – each model portfolio is actively managed by a team of discretionary investment managers who leverage our centralised investment process which involves research and analysis across multiple asset classes and geographies to inform our house view and securities buylists.
- **Client updates and information** – your client will receive a comprehensive personal portfolio valuation on a quarterly basis and access to InvestBM, an online portal, which provides up to date portfolio valuations, a record of all transactions and tools to analyse and understand specific holdings. Individual factsheets are published monthly for each model to provide updates on performance and portfolio composition and additional insights including market commentary is available on our website.
- A dedicated [Responsible Investment Hub](#) available on our website and we also publish a RIS report on a biannual basis.
- **Custody and administration** – your clients' assets will be held in our custody and we will be responsible for all administration activity associated with their portfolio.



Given the range of common investment benefits and the individual client servicing and administration provided by the service, we believe it can meet a variety of needs, providing a professional investment solution for clients.

Quality of service

For 2023, Defaqto has assessed and awarded our MPS Direct service a five star rating, the highest available. In addition, Defaqto's annual satisfaction survey showed Brooks Macdonald ranked in the top 5 as a preferred provider for DFM services amongst financial advisers.

The number of client complaints we have received remains very low, but there has been a slight rise following a recent digital upgrade within the business. Ultimately this digital transformation will strengthen our business and provide an improved service for our clients, but we appreciate the stress that change can cause, and we are working to make the transition across to our new systems as smooth as possible, for all involved.

The majority of our MPS clients have been with us for at least seven years and over two thirds have been with us for at least five years.

We believe that clients' satisfaction with this service is good. We will continue to closely monitor our management information so we can provide a high quality of service to clients.

Performance

Assessment of the performance of MPS portfolios relative to the MSCI PIMFA Private Investor indices shows:

- Model portfolios in the active strategy have outperformed their benchmarks on a five year rolling basis over 65% of the time.
- Model portfolios in the passive strategy have outperformed their benchmarks on a five year rolling basis over 60% of the time.

We acknowledge that sometimes portfolios will underperform during points in the investment cycle given their particular investment style. Due to the short track record of the model portfolios in the Responsible Investment strategy we are unable to provide benchmarked performance. For additional data and information about the historic performance of our investment management products and services, please refer to the factsheets and literature available on our website.

Source: Brooks Macdonald and MSCI, as at December 2022. MSCI: please see important information.

Price

The service has an appropriate pricing structure to ensure individual clients pay a fair rate.

Given the standardised nature of the service, the current pricing approach means that clients will typically pay a similar investment service fee rate. There is a degree of flexibility to ensure clients with large portfolios will not pay high nominal fees that cannot be justified by a commensurately larger management burden for Brooks Macdonald.

Entry fees only apply for in-specie transfers, exit fees are not typically charged for this service. Additional administrative costs are only levied when specific events that warrant them occur.

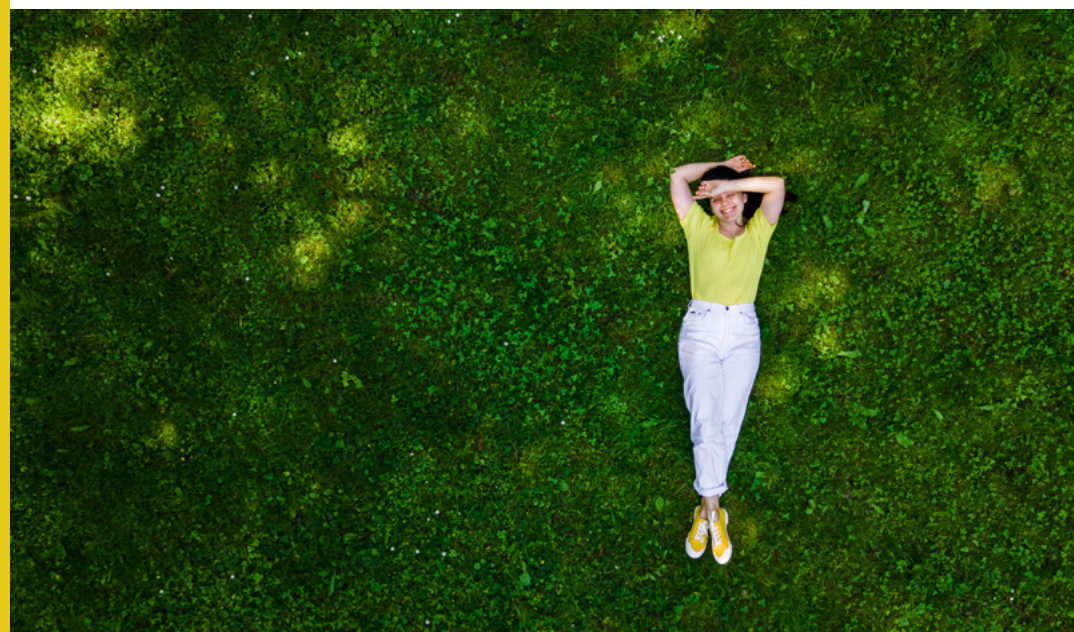
As this service invests significantly in third party funds, a material part of the total cost to clients will be the underlying product charges levied and collected by the fund manager. We actively monitor these costs and endeavour to ensure we get competitive rates.

In the context of Brooks Macdonald's full range of investment products and services, this service has a higher cost to clients than others offered by Brooks Macdonald.

We have compared the total cost to clients of this service with other firms offering a similar service and found ours to be in line with our peers.

Given the standardised nature of the service, it is expected that clients will pay a similar level of fees. We have reviewed the actual rates paid by clients of the service to ensure the dispersion is in line with our expectations. Where we have identified any outliers paying higher than expected fees, we have taken action.

We regularly review our costs and fee structures to ensure that they are reasonable and appropriate for clients. We are currently in the process of conducting a separate, comprehensive review of pricing across our range of discretionary products and services. Our findings from this value assessment will be considered as part of that work.



Costs

A significant proportion of the total cost to Brooks Macdonald of delivering this service is the staff costs associated with providing clients with a specific range of common investment benefits, with full servicing and administration. In the context of Brooks Macdonald's full range of investment products and services, the service has a moderate cost to deliver.

Effective management of costs is a key requirement for providing value to clients. We will continue to closely monitor the costs we incur to deliver this service and will seek to pass on any savings or reinvest back into our business to enhance the investment services we provide to clients.

Conclusion

We believe the total cost to clients of the Managed Portfolio Service is proportionate and fair in the context of its total benefits and that the service represents value for money for clients.

Platform Managed Portfolio Service (PMPS): Active, Passive, Volatility Managed, Responsible Investment and BMIS strategies

Key features and benefits

This is a managed portfolio service that provides clients with a choice of 26 model portfolios that are managed to specific investment objectives and risk levels, and using active, passive, volatility managed or responsible investment strategies. It is offered on a discretionary basis, which means that a team of investment managers will make investment decisions at a model level, using their knowledge and expertise.

The benefits:

- **Investment mandate** - each model portfolio has a specific investment objective and risk profile, the range of models available meet a variety of client needs including growth and/or income over five risk levels. The investment managers will follow the associated investment strategy of the model, investing in actively managed funds, passively managed funds, or actively managed funds that aim to advance businesses that provide solutions to sustainability issues, or have strong corporate policies and outputs relating to ESG criteria.
- **Investment universe** - each model portfolio is actively managed by a team of discretionary investment managers who leverage our centralised investment process which involves research and analysis across multiple asset classes and geographies to inform our house view and securities buylists.
- **Client updates and information** - individual factsheets are published monthly for each model to provide updates on performance and portfolio composition, and additional insights including market commentary is available on our website. A dedicated Responsible Investment Hub available on our website and we also publish a RIS report on a biannual basis.
- **Custody and administration** - your clients' assets will be held in custody and administered by a third-party, Brooks Macdonald has no involvement from this perspective.



Given the range of common investment benefits provided by the service, we believe it can meet a variety of needs, providing an attractive investment solution for clients.

Quality of service

For 2023, Defaqto has assessed and awarded our MPS on Platform service a five star rating, the highest available. In addition, Defaqto's annual satisfaction survey showed Brooks Macdonald ranked in the top 5 as a preferred provider for DFM services amongst financial advisers.

No complaints have been received from clients about this service in the last 12 months.

As client assets are custodied by third parties, we have limited visibility of day to day flows and client level detail. We rely on regular management information from third party platforms that allows us to monitor this. Over the last three years the service has attracted strong positive net flows.

We believe that clients' satisfaction with this service is good. We will continue to closely monitor our management information so we can provide a high quality of service to clients.

Performance

Assessment of the performance of our PMPS portfolios relative to the MSCI PIMFA Private Investor indices shows:

- Model portfolios in the active strategy have outperformed their benchmarks on a five year rolling basis over 65% of the time.
- Model portfolios in the passive strategy have outperformed their benchmarks on a five year rolling basis over 60% of the time.
- Model portfolios in the volatility managed strategy have outperformed their benchmarks on a five year rolling basis over 50% of the time.

We acknowledge that sometimes portfolios will underperform during points in the investment cycle given their particular investment style. Due to the short track record of the model portfolios in the Responsible Investment and BMIS strategies we are unable to provide benchmarked performance. For additional data and information about the historic performance of our investment management products and services, please refer to the factsheets and literature available on our website.

Source: Brooks Macdonald and MSCI, as at December 2022. MSCI: please see important information.

Price

The service has an appropriate pricing structure to ensure any individual client pays a fair rate.

Given the standardised nature of the service, the current pricing approach means that clients will typically pay a similar investment service fee rate.

As this service invests significantly in third party funds, a material part of the total cost to clients will be the underlying product charges levied and collected by the fund manager. We actively monitor these costs and endeavour to ensure we get competitive rates.

In the context of Brooks Macdonald's full range of investment products and services, this service has a lower cost to clients than others offered by Brooks Macdonald.

We have compared the total cost to clients of this service with other firms offering a similar service and found ours to be in line with our peers.

Given the standardised nature of the service, it is expected that clients will pay a similar level of fees. This service is only available to clients through professional advisers authorised to give financial advice and we may agree a discount for certain firms based upon longevity and/or economies of scale.

We regularly review our costs and fee structures to ensure that they are reasonable and appropriate for clients. We are currently in the process of conducting a separate, comprehensive review of pricing across our range of discretionary products and services. Our findings from this value assessment will be considered as part of that work.

Costs

The total cost to Brooks Macdonald of delivering this service is associated with providing clients with a specific range of common investment benefits, without individual tailoring or servicing and administration. In the context of Brooks Macdonald's full range of investment products and services, the service has a lower cost to deliver.

Effective management of costs is a key requirement for providing value to clients. We will continue to closely monitor the costs we incur to deliver this service and will seek to pass on any savings or reinvest back into our business to enhance the investment services we provide to clients.



Conclusion

We believe the total cost to clients of the Platform Managed Portfolio Service is proportionate and fair in the context of its total benefits and that the service represents value for money for clients.

Fund Portfolio Service (FPS)

Key features and benefits

This is a service that accesses a unitised multi-asset solution and provides clients with a choice of 16 portfolios that span different risk levels and investment styles.

The benefits:

- **Investment mandate** – your client's portfolio will be invested in one or more of the Cornelian Risk Managed funds. Each underlying fund has a specific investment objective and risk profile, so the range of solutions available will meet a variety of client needs including growth and/or income, over five risk levels. The investment managers will follow the associated investment strategy of the fund, investing either actively or passively.
- **Investment universe** – each underlying fund is actively managed by a team of fund managers who leverage our centralised investment process which involves research and analysis across multiple asset classes and geographies to inform our house view and securities buylists.
- **Client updates and information** – your client will receive a comprehensive personal portfolio valuation on a quarterly basis, an annual review, and access to InvestBM, an online portal, which provides up to date portfolio valuations, a record of all transactions and tools to analyse and understand specific holdings.
- Your client also has direct access to their investment manager and a local support team who are responsible for all ongoing administration of your client's portfolio and are available to respond to any of your clients' questions or requests.
- Individual factsheets are published monthly for each underlying fund to provide updates on performance and portfolio composition; additional insights including market commentary is available on our website.
- **Custody and administration** – your clients' assets will be held in our custody and we will be responsible for all administration activity associated with their portfolio.



Given the range of common investment benefits and the individual client servicing and administration provided by the service, we believe it can meet a variety of needs, providing a professional investment solution for clients.

Quality of service

While Defaqto do not specifically review the Fund Portfolio Service, for 2022, they have assessed the underlying range of funds and awarded them with a five diamond rating, the highest available. The underlying range of funds are also reviewed and rated by other third-party research firms including RSMR and Dynamic Planner. In addition, Defaqto's annual satisfaction survey showed Brooks Macdonald ranked in the top 5 as preferred provider for DFM services amongst financial advisers.

No complaints have been received from clients about this service in the last 12 months.

The service was migrated to Brooks Macdonald as part of the Cornelian acquisition in 2020 and is not currently actively distributed.

We believe that clients' satisfaction with this service is good. We will continue to develop and monitor our management information so we can provide a high quality of service to clients.

Performance

Assessment of the performance of the underlying funds relative to their inflation-based targets shows:

- The underlying actively managed funds have outperformed their benchmark on a five year rolling basis over 55% of the time.
- The underlying passively managed funds have outperformed their benchmark on a five year rolling basis over 10% of the time.

We acknowledge that sometimes portfolios will underperform during points in the investment cycle given their particular investment style. Recent inflation levels have presented an historically high performance benchmark for the funds, particularly the passive range where the scope for the fund managers to generate alpha is lower. The fund managers remain confident that the funds can generate attractive returns over the investment cycle and we will continue to monitor via our product governance processes. For additional data and information about the historic performance of our investment management products and services, please refer to the factsheets and literature available on our website.

Clients who utilise the optional CGT management feature of this service may also benefit financially from tax efficiencies.

Source: Morningstar, as at December 2022

Price

The service has an appropriate pricing structure to ensure any individual client pays a fair rate.

Given the standardised nature of the service, the current pricing approach means that clients will typically pay a similar rate.

As this service invests significantly in third party funds, a material part of the total cost to clients will be the underlying product charges levied and collected by the fund manager. We actively monitor these costs and endeavour to ensure we get competitive rates.

In the context of Brooks Macdonald's full range of investment products and services, this service has a lower cost to clients than others offered by Brooks Macdonald.

We have compared the total cost to clients of this service with other firms offering a similar service and found ours to be in line with our peers.

Given the standardised nature of the service, it is expected that clients will pay a similar level of fees. We have reviewed the actual rates paid by clients of the service to ensure the dispersion is in line with our expectations.

We regularly review our costs and fee structures to ensure that they are reasonable and appropriate for clients. We are currently in the process of conducting a separate, comprehensive review of pricing across our range of discretionary products and services. Our findings from this value assessment will be considered as part of that work.

Costs

The total cost to Brooks Macdonald of delivering this service is associated with providing clients with a specific range of common investment benefits, with some individual tailoring, and servicing and administration. In the context of Brooks Macdonald's full range of investment products and services, the service has a higher cost to deliver.

Effective management of costs is a key requirement for providing value to clients. We will continue to closely monitor the costs we incur to deliver this service and will seek to pass on any savings or reinvest back into our business to enhance the investment services we provide to clients.



Conclusion

We believe the total costs of the Fund Portfolio Service are proportionate and fair in the context of its total benefits and that the service represents value for money for clients.

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UK-ValueAssessmentReport-April2023-0423-012



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