

**M G T S**

**Assessment of Value  
The Blenheim Fund**

**For the year ended 30 November 2023**

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## Foreword

We are pleased to present the Assessment of Value (AoV) document prepared by the Margetts Fund Management Ltd (Margetts) team. This report has been reviewed, challenged, and approved by our independent non-executive directors (INEDs). Further information about our INEDs can be found on the Margetts website at [www.margetts.com](http://www.margetts.com). The Margetts Board of Directors are responsible for the review and approval process.

This AoV is intended to provide investors with a fair and balanced assessment of the overall value they have received and identify any remedial actions required. We believe the report provides the insight you need to understand the steps we are taking to ensure we offer value to investors in the Funds. In addition, this assessment considers and evidences where we consider that good investor outcomes are being delivered, and where further action is being taken to address any areas of improvement that have been identified.

## Summary of Findings

Margetts has considered the information obtained from analysing each of the relevant criteria detailed below and other information available (such as commercially sensitive information which cannot be disclosed here).

Following this process, a summary of the overall assessment of value is shown below:

	<b>Blenheim Diversified Fixed Income</b>	<b>Blenheim Diversified Alternatives</b>	<b>Blenheim Ethical Opportunities</b>	<b>Blenheim Ethical Growth</b>	<b>Blenheim UK Equity</b>	<b>Blenheim Diversified Property</b>	<b>Blenheim Overseas Equity</b>
Quality of Service	A	A	A	A	A	A	A
Performance	N/A	N/A	N/A	N/A	N/A	N/A	N/A
AFM Costs	A	A	A	A	A	A	A
Comparable Market Rates	B	A	B	N/A	B	B	B
Comparable Services	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Economies of Scale	A	A	A	A	A	A	A
Classes of Shares	B	B	B	B	B	B	B

Margetts are satisfied that the direct and indirect costs (including fees), paid from the scheme property, are justified in the context of overall value delivered to investors and detailed comments have been provided later within this document.

In comparison to other schemes within the same Investment Association (IA) sectors, the Ongoing Charges Figure (OCF) across the Blenheim Sub-funds are reasonably priced. This conclusion has been reached given the range of services provided to investors, the economies of scale achieved through underlying fund discounts and the Sub-funds meeting their stated objectives.

## Actions

### Follow-Up from Previous Year

There were no actions required from the previous year.

### Proposed for Coming Year

There are no proposed action points for the coming year.

## Background

The Blenheim Fund consists of seven Sub-funds which are called Blenheim Diversified Fixed Income, Blenheim Diversified Alternatives, Blenheim Ethical Opportunities, Blenheim Ethical Growth, Blenheim UK Equity, Blenheim Diversified Property and Blenheim Overseas Equity (the Sub-funds). The Blenheim Ethical Growth Sub-fund was launched within the reporting period on the 6<sup>th</sup> November 2023, designed to offer a higher equity content than the Blenheim Ethical Opportunities Sub-fund whilst maintaining the same ethical investment framework. The Blenheim Sub-funds are 'funds of funds' and are required to hold at least 70% in collective investment schemes (usually comprising equities, bonds and property), and up to 30% directly held in shares, bonds, cash, near cash instruments, investment trusts, real estate investment trusts (REITs) and structured products which may embed derivatives.

The Sub-funds have been established to provide an actively managed portfolio of assets appropriate for a wide variety of investors. The managers aim to achieve capital growth and/or income with a diverse range of underlying assets, deriving excess returns through asset allocation and security selection. Blenheim seek to pair experienced fund managers with modern quantitative insights to allow optimal decision-making.

The level of risk exposure increases in the following order: Blenheim Diversified Fixed Income, Blenheim Diversified Alternatives, Blenheim Ethical Opportunities, Blenheim Ethical Growth, Blenheim UK Equity, Blenheim Diversified Property, and Blenheim Overseas Equity. This is denoted primarily by the increase in recommended holding periods, used as an indicator of associated risks, and subsequently by the increasing minimum and maximum exposure limits for equity and mixed assets funds.

There are currently two classes of units (referred to as share classes) available which are 'B' and 'R'. The 'B' class is aimed at investors advised by Becketts and 'R' class is more widely accessible.

Margetts, as the AFM (Authorised Fund Manager) of the Fund, is required to conduct an AoV to review the overall value delivered to investors, at least annually. The assessment considers whether the payments out of the scheme property (including fees), as set out in the prospectus, are justified in the context of the overall value delivered to investors. The assessment has been carried out at a share class level, however as the results are similar, we have reported at the Sub-fund level and highlighted any differences where relevant.

Performance and risk data has been based on the 'B' share class as this share class has the most invested across the Fund. Performance and risk metrics are tabulated in the appendix for all available share classes.

Margetts have set out below the assessment based on the quality of service, performance, AFM costs, comparable market rates, comparable services, economies of scale, and classes of shares available.

The review considers the following questions:

- **Quality of service** – are we setting and meeting appropriate standards?
- **Performance** – have the funds performed in line with expectations?
- **General costs of the authorised fund manager (AFM)** – are the fees charged to the funds reasonable and justified?
- **Comparable market rates** – how do fees compare against similar products from other providers?
- **Comparable services** – how do the fees we charge the funds compare with what we charge investors for similar products?
- **Economies of scale** – are savings being made and passed on to investors?
- **Classes of shares available** – are different share class charging structures appropriate and can the investor access the best share class for them?

Please note that all figures are provided to the annual accounting date of 30 November 2023 unless otherwise stated.

## Detailed Comments

### Quality of Service

The most relevant service provided is the fund management process operated by Beckett Asset Management Limited (BAM) in respect of the Fund. The investment process was considered as part of this assessment of value and is summarised below.

The Investment Committee consists of Samantha Owen (Director at BAM), Tony Yousefian (Portfolio Manager at BAM), Elliot Basford (Portfolio Manager at BAM) and Scott Buxton (Investment Support at BAM). The Investment Committee are supported by the Margetts risk management team which is independent of the Investment Committee and is led by Tony Mee (Independent Subject Matter Expert). The teams are well resourced, appropriately qualified and experienced.

The investment philosophy focuses on identifying market inefficiencies, diversifying asset allocation and combining qualitative and quantitative techniques to generate outperformance. The BAM Investment Committee meet formally on a monthly basis to review macroeconomic conditions and fund performance, using Morningstar data packs and charts, model data and quantitative screens. Asset allocation is discussed in separate meetings held on a quarterly basis.

Communication with investors takes many forms, from monthly manager commentary on factsheets to individual one-to-one meetings discussing positioning, historic attribution, and outlook for various asset classes. Six monthly and annual report and accounts are also produced and circulated.

There are various additional services and features provided by Margetts related to the Sub-funds. The services and features will differ from investor to stakeholder, as will the value they believe it is reasonable to pay for. Key features and benefits of those Margetts believe are most important are listed below, together with comments to help investors assess the value provided or consider where benefits and services have no value or may be resulting in a cost that could be mitigated.

The Margetts Directors receive detailed management information regarding complaints, errors, potential rule breaches and service standards which are considered when preparing the summary information below.

*Governance* – Margetts has an overarching obligation to maintain appropriate systems and controls including conducting regular self-assessment of the quality of oversight, review and supervisory activities. In addition, Margetts is subject to scrutiny by third parties involved within the operation of the funds such as the auditor and depository.

*Security* – Margetts believes that investors are concerned about the risk of fraudulent transactions which could diminish the value of their savings, and therefore places a significant value on systems and controls which mitigate this risk.

*Financial Stability and Professional Indemnity Insurance* – Margetts maintains high levels of professional indemnity insurance and operates a profitable business model, retaining cash reserves which considerably exceed the minimum regulatory requirements.

*Direct Access* (avoiding use of a platform and associated costs) – Margetts has identified that many investors incur unnecessary charges by using platforms and provides a number of tools to replace the benefit of using a platform to allow direct investment achieving overall lower costs. Margetts provides direct ISAs, Junior ISAs, general investment accounts, facilitation of adviser charging, regular withdrawals, regular savings, capital gains tax calculations and online valuations.

*Client Services* – Margetts provides access to a well-resourced client services team to assist investors and their advisers with all aspects of administration as required.

*Systems and Controls* – Margetts operates on a fully insourced business model including client services, fund accounting, transfer agency, cash reconciliations, fund pricing and risk management.

### **Findings and Comments**

In view of the comments above we are satisfied that there is clear evidence that value is being provided through the fund management process and the wide range of services offered.

	<b>Blenheim Diversified Fixed Income</b>	<b>Blenheim Diversified Alternatives</b>	<b>Blenheim Ethical Opportunities</b>	<b>Blenheim Ethical Growth</b>	<b>Blenheim UK Equity</b>	<b>Blenheim Diversified Property</b>	<b>Blenheim Overseas Equity</b>
Quality of Service	A	A	A	A	A	A	A

## Performance

A summary of the fund objectives, minimum recommended holding period, minimum and maximum allocation to shares and comparator benchmark are shown in the table below. The comparator benchmark is used for reference purposes only and is based on a relevant peer group compiled by the Investment Association (IA).

<b>Sub-fund</b>	<b>Summarised Objective</b>	<b>Minimum Recommended Holding Period (RHP)</b>	<b>Min and Max Allocation to Shares</b>	<b>Comparator</b>
Blenheim Diversified Fixed Income	To provide income	3 years	0% - 30%	IA £ Strategic Bond
Blenheim Diversified Alternatives	To provide a positive total return over any 3 year period	3 years	0% - 30%	IA Targeted Absolute Return
Blenheim Ethical Opportunities	To provide capital growth over any 5 year period through ethical investment choices	5 years	20% - 60%	IA 20-60% Shares
Blenheim Ethical Growth	To provide capital growth over any 6 year period through ethical investment choices	6 years	40% - 85%	IA 40-85% Shares
Blenheim UK Equity	To provide capital growth over any 6 year period	6 years	80% - 100%	IA UK All Companies
Blenheim Diversified Property	To provide capital growth over any 7 year period and to provide income	7 years	0% - 30%	IA Property Other
Blenheim Overseas Equity	To provide capital growth over any 7 year period	7 years	70%-100%	IA Flexible Investment

The table below provides annualised<sup>1</sup> one-year, since inception, and the appropriate minimum RHP performance for each Sub-fund net of charges and the comparator benchmark to the 30<sup>th</sup> November 2023.<sup>2</sup> As none of the Blenheim Sub-funds have reached their recommended minimum holding period, N/A is given for these figures. A green font indicates a positive outcome for the Sub-fund against the comparator, and red font indicates a negative outcome.<sup>3</sup>

### Return Statistics (sourced from Morningstar)

Sub-fund	Comparator	1-year Sub-fund performance	1-year comparator performance	1-year added value	Sub-fund performance since date of first inflow <sup>4</sup>	Comparator performance since date of first inflow	Added value since date of first inflow	Minimum RHP Sub-fund performance (annualised)	Minimum RHP comparator performance (annualised)	Minimum RHP added value
Blenheim Diversified Fixed Income	IA £ Strategic Bond	3.11%	3.40%	-0.29%	-1.22%	-2.57%	1.35%	N/A	N/A	N/A
Blenheim Diversified Alternatives <sup>5</sup>	IA Targeted Absolute Return	-2.43%	3.21%	-5.64%	0.39%	5.29%	-4.90%	N/A	N/A	N/A
Blenheim Ethical Opportunities	IA 20-60% Shares	1.93%	1.76%	0.17%	0.69%	-0.68%	1.37%	N/A	N/A	N/A
Blenheim Ethical Growth	IA 40-85% Shares	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Blenheim UK Equity	IA UK All Companies	2.17%	0.24%	1.93%	2.11%	2.21%	-0.10%	N/A	N/A	N/A
Blenheim Diversified Property	IA Property Other	-1.40%	-2.44%	1.04%	-1.87%	-2.08%	0.21%	N/A	N/A	N/A
Blenheim Overseas Equity	IA Flexible Investment	1.65%	1.85%	-0.20%	0.30%	1.01%	-0.71%	N/A	N/A	N/A

<sup>1</sup> Annualised figures provide the equivalent performance over one year so that comparisons can be made more easily with other timeframes. For example, a return of 9.27% over three years is an annualised return of 3% because if you received 3% per annum for 3 years the overall return would be 9.27%.

<sup>2</sup> As the Blenheim Sub-funds have not reached their minimum recommended holding period, these figures are not included within the performance tables.

<sup>3</sup> In the case of risk metrics, a negative figure indicates lower risk and will result in a green font with a positive outcome.

<sup>4</sup> The date of first inflow for all Sub-funds was 19<sup>th</sup> January 2021.

<sup>5</sup> For Blenheim Diversified Alternatives and Blenheim Diversified Property, the data is generated from FE Analytics, as Morningstar does not provide data for the IA Targeted Return Bond sector and IA Property Other respectively.



Risk Statistics (sourced from FE Analytics)

Sub-fund	Comparator	Sub-fund drawdown since date of first inflow	Comparator max drawdown since date of first inflow	Difference	Sub-fund annualised volatility since date of first inflow	Comparator annualised volatility since date of first inflow	Difference
Blenheim Diversified Fixed Income	IA £ Strategic Bond	-10.63%	-15.68%	5.05%	3.42%	4.74%	-1.32%
Blenheim Diversified Alternatives	IA Targeted Absolute Return	-8.83%	-2.75%	-6.08%	4.59%	2.55%	2.04%
Blenheim Ethical Opportunities	IA 20-60% Shares	-10.37%	-13.77%	3.40%	6.30%	6.39%	-0.09%
Blenheim Ethical Growth	IA 40-85% Shares	N/A	N/A	N/A	N/A	N/A	N/A
Blenheim UK Equity	IA UK All Companies	-19.45%	-17.72%	-1.73%	11.82%	12.81%	-0.99%
Blenheim Diversified Property	IA Property Other	-18.23%	-26.94%	9.46%	7.68%	13.57%	-5.89%
Blenheim Overseas Equity	IA Flexible Investment	-15.58%	-13.32%	-2.26%	12.49%	8.36%	4.13%

## Blenheim Diversified Fixed Income and Blenheim Diversified Property Yield<sup>6</sup>

Both Sub-funds have an investment objective to provide income, over the reporting period each Sub-fund achieved yield at the below percentages, therefore fulfilling this element of the investment objective. Yield statistics for all share classes of the two Sub-funds are available in the appendix below.

Sub-Fund	12-month yield to 30/11/2023
Blenheim Diversified Fixed Income	3.52%
Blenheim Diversified Property	2.80%

### Findings and Comments

None of the Sub-funds within the Blenheim range have reached their minimum recommended holding period, having been launched in early 2021, except for the recently launched Blenheim Ethical Growth Sub-fund.<sup>7</sup> Over one year there was outperformance against the comparator from Blenheim UK Equity, Blenheim Diversified Property, and Blenheim Ethical Opportunities, while the other Sub-funds lagged. Since inception, Blenheim Diversified Fixed income, Blenheim Ethical Opportunities and Blenheim Diversified Property have outperformed their comparators. Blenheim Diversified Alternatives and Blenheim Overseas Equity have underperformed their comparators since inception, while Blenheim UK Equity returned close in line to the IA UK All Companies sector.

Risk metrics since inception have shown no evident sign of excessive risk being taken by the managers in order to achieve returns. Blenheim Overseas Equity saw excess drawdown and standard deviation compared to the IA Flexible Investment sector, which is not unexpected as the sector contains a variety of investment styles and not all funds in the sector are fully invested in equities, and funds with a higher allocation to cash and bonds reduce the sector average of risk metrics. The Blenheim UK Equity Sub-fund saw additional drawdown across the period compared to the IA UK All Companies sector, and Blenheim Diversified Alternatives saw increased risk metrics in both categories. All other risk metrics across the Blenheim Sub-funds were lower than sector equivalents.

The Blenheim Diversified Alternative Sub-fund has a notable tilt towards alternative energy and renewables in its asset allocation, which are typically long duration investments and are prone to changes in interest rates. The rising rate environment of 2023 which saw bond yields rise materially in comparison to the low borrowing costs of recent years had an adverse effect upon long-duration assets and resulted in sell-offs, which has seen the fund underperform with increased risk metrics during this reporting period.

The Blenheim Diversified Fixed Income and Blenheim Diversified Property Sub-funds both achieved the income criteria of their investment objectives.

The Blenheim Ethical Opportunities Sub-fund continues to be managed to the stated mandate where the managers are only allowed to purchase investments with certain credentials and characteristics.

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<sup>6</sup> Yield statistics have been sourced from Morningstar.

<sup>7</sup> The performance scores have been calculated based on the funds' excess performance, excess standard deviation and excess maximum drawdown as compared to their respective comparator benchmarks. Each individual factor is evaluated using defined bands which were based on deviations within the relevant IA sectors using rolling 3-year periods assessed over 20 years which have been averaged.

The recently launched Blenheim Ethical Growth Sub-fund is run using the same ethical criteria. There is regular oversight in place to ensure that the managers manage the Sub-funds in line with the investment process. This oversight demonstrates that the current holdings either directly match the ESG exclusion criteria or demonstrate an appropriate ESG mandate sufficient for inclusion.

	Blenheim Diversified Fixed Income	Blenheim Diversified Alternatives	Blenheim Ethical Opportunities	Blenheim Ethical Growth	Blenheim UK Equity	Blenheim Diversified Property	Blenheim Overseas Equity
Performance	N/A	N/A	N/A	N/A	N/A	N/A	N/A

## General Costs of the AFM

The AFM is required to review the costs of the services provided to the Sub-funds within the context of the fees paid and consider if the profit margins represent a competitive market environment.

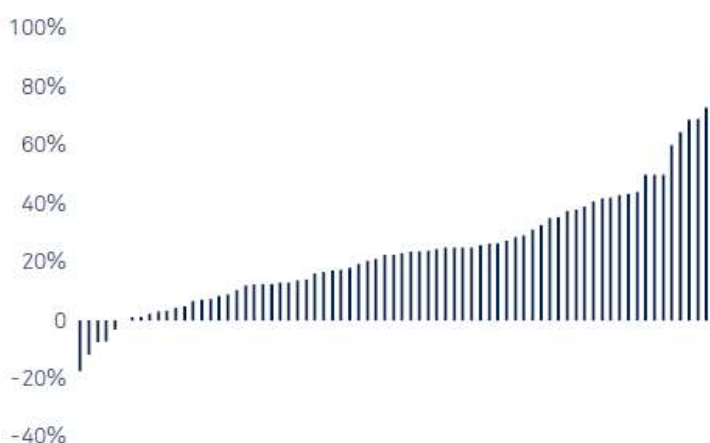
### Findings and Comments

For the year ending 30<sup>th</sup> September 2023 the audited accounts for Margetts Fund Management Ltd showed an operating profit margin of 6.01%.

The most significant expenses for the reporting period were salaries, the details of which for the corresponding period are available in the ‘Remuneration’ section of the latest report and accounts documents for the Funds on the Margetts company website (<https://MGTSFunds.com/>).

The latest available IA Annual Survey published in September 2023 provided a graphical representation of asset manager profitability (see the diagram extract below). The profitability of Margetts Fund Management Ltd is within the fourth quartile of profitable firms and therefore suggests profits are modest compared with the cost of the services provided.

**CHART 63: DISTRIBUTION OF INVESTMENT MANAGER PROFITABILITY IN 2022**



Source: The Investment Association

	<b>Blenheim Diversified Fixed Income</b>	<b>Blenheim Diversified Alternatives</b>	<b>Blenheim Ethical Opportunities</b>	<b>Blenheim Ethical Growth</b>	<b>Blenheim UK Equity</b>	<b>Blenheim Diversified Property</b>	<b>Blenheim Overseas Equity</b>
General Costs of the AFM	A	A	A	A	A	A	A

## Comparable Market Rates and Comparable Services

The Blenheim funds are Fund of Funds and the OCF and transaction costs have been compared to other Fund of Funds within the same sector.

The OCF and transaction costs for other type of fund which purchase securities directly have also been included for reference. This is because the total number of Fund of Fund within each sector varies significantly, with some sectors having fewer than 5 other Fund of Funds. For the reasons described in the finding and comments section below, the OCF for a Fund of Funds is expected to be higher than for an equivalent direct fund.

### Ongoing Charges Figure (OCF)

The overall OCF is made up of the following components and totalled below. Charges for the 'R' share class are shown below, which is the cheapest share class available to investors without restriction and used in line with IA primary share class guidance. Charges for Blenheim Ethical Growth are not displayed due to the recent inception, and accordingly are not scored. The 'B' share class is the largest share class in size. The findings are based on all share classes and the data for the other share classes is shown in the attached Appendix.

	<b>Blenheim Diversified Fixed Income</b>	<b>Blenheim Diversified Alternatives</b>	<b>Blenheim Ethical Opportunities</b>	<b>Blenheim Ethical Growth</b>	<b>Blenheim UK Equity</b>	<b>Blenheim Diversified Property</b>	<b>Blenheim Overseas Equity</b>
Annual Management Charge (including fund accounting)	0.35%	0.35%	0.35%	N/A	0.35%	0.35%	0.35%
Depositary, Custody, Audit and Administration Costs/Rebates	0.00%	0.00%	0.00%	N/A	0.00%	0.01%	-0.02%
Underlying Fund Synthetic OCFs <sup>8</sup>	0.45%	0.75%	0.69%	N/A	0.52%	0.90%	0.63%
<b>Total</b>	<b>0.80%</b>	<b>1.10%</b>	<b>1.04%</b>	N/A	<b>0.87%</b>	<b>1.26%</b>	<b>0.96%</b>
Average OCF for fund of funds in the same sector	0.77%	1.69%	1.07%	N/A	0.99%	1.20%	1.13%
<b>Difference</b>	<b>+0.03%</b>	<b>-0.59%</b>	<b>-0.03%</b>	N/A	<b>-0.12%</b>	<b>+0.06%</b>	<b>-0.27%</b>
Average OCF for other direct funds in the same sector	0.70%	0.89%	0.91%	N/A	0.71%	0.85%	1.07%

<sup>8</sup> Synthetic OCF is the cost of the underlying funds within the portfolio and not the fund itself. This includes OCF charges for Collective Investment Schemes and Exchange Traded Funds in line with IA guidance. The synthetic OCF figures are derived from the OCF information published by the relevant fund group.

## Portfolio Turnover and Transaction Costs

	Blenheim Diversified Fixed Income	Blenheim Diversified Alternatives	Blenheim Ethical Opportunities	Blenheim Ethical Growth	Blenheim UK Equity	Blenheim Diversified Property	Blenheim Overseas Equity
Portfolio Turnover (European calculation) <sup>9</sup>	109.53%	24.40%	13.40%	N/A	22.58%	48.74%	116.72%
Portfolio Turnover (US calculation) <sup>10</sup>	54.98%	15.77%	10.27%	N/A	12.69%	26.57%	61.22%
Transaction costs	0.29%	0.09%	0.19%	N/A	0.16%	0.22%	0.25%
Transaction costs for fund of funds in the same sector	0.14%	0.20%	0.09%	N/A	0.00%	0.09%	0.12%
<b>Transaction Cost Difference</b>	<b>+0.15%</b>	<b>-0.11%</b>	<b>+0.10%</b>	N/A	<b>+0.16%</b>	<b>+0.13%</b>	<b>+0.13%</b>
Transaction costs for other direct funds in the same sector	0.25%	0.48%	0.19%	N/A	0.21%	0.18%	0.23%

<sup>9</sup> The European calculation adjusts for inflows and outflows, where investors buy or sell the fund. The European calculation can result in a negative number where the combined inflows and outflows exceed the combined purchases and sales made within the Funds. In this case a figure of 0.00% is recorded.

<sup>10</sup> The US calculation looks at underlying sales divided by the average value of the fund.

Portfolio turnover is relevant to transaction costs as the higher the turnover the more transaction costs will be incurred.

Margetts are required to consider costs based on comparable market rates and comparable services. At this time, the availability of comparable market rate data is limited and therefore the readily available total OCF and ex-post (i.e. actual costs incurred in the portfolio as opposed to an estimate) transaction data has been used, grouped by the relevant IA peer group. This data is published in a prescribed regulatory format within data files that fund management groups must make available.

We have considered the cost of the Sub-funds against other similar umbrella structures operated by the AFM. Different Sub-funds have varying OCFs, reflecting the types of assets and the complexity of each fund. We have reviewed the costs of these Sub-funds relative to other funds operated by the AFM and are satisfied that the differences in OCF do not reflect detrimental pricing between investors.

### **Findings and Comments**

The Blenheim Sub-funds are 'funds of funds' which are a recognised type of fund that hold a selection of other funds. The benefit of this strategy is that a range of carefully selected funds can be held to gain exposure to global markets and asset types, providing a high level of diversification and the potential to appoint a specialist manager for each asset and/or market. The disadvantage is that costs are often higher than other directly invested funds as the costs of both the fund and the underlying funds must be considered.

The assessment of value rules requires us to consider costs taken from the Sub-funds however the costs of underlying funds are not specifically included and subject to their own individual value assessment criteria. Nevertheless, we consider the overall costs when assessing value in relation to costs.

We are satisfied that the additional costs for a fund of funds structure are appropriate given the diversification and specialist management that can be achieved. The costs and structure of the Blenheim Sub-funds are clearly set out within the supporting documentation and literature.

The AFM does not offer any comparable services to those provided to the funds.

The cost of all Sub-funds in the range are below that of the average for their respective sectors, with the exception of Blenheim Diversified Fixed Income and Blenheim Diversified Property, which were slightly above the average fund of funds in their respective sectors. Transaction costs were above the sector averages for all Sub-funds apart from Blenheim Diversified Alternatives. Turnover and transaction costs for the Blenheim Diversified Property fund were elevated over the reporting period due to an active management decision to reduce direct property exposure and purchase property ETFs.

	Blenheim Diversified Fixed Income	Blenheim Diversified Alternatives	Blenheim Ethical Opportunities	Blenheim Ethical Growth	Blenheim UK Equity	Blenheim Diversified Property	Blenheim Overseas Equity
Comparable Market Rates	B	A	B	N/A	B	B	B
Comparable Services	N/A	N/A	N/A	N/A	N/A	N/A	N/A

## Economies of Scale

In considering economies of scale, we have identified the following areas and provided commentary detailing how these have been used to reduce overall costs. We have not identified any economies of scale which are not being exploited at present.

- Margetts has used its overall asset base to negotiate more competitive terms with the depositary and custodian for the benefit of the funds.
- Beckett Asset Management, as the appointed Investment Adviser to the funds, use their aggregate deal size to achieve discounts from the underlying fund providers. A larger scale of assets under management within the Blenheim fund also results in a cheaper overall rate charged by the AFM on the basis of a tiered charging structure. BAM have also been able to reduce dealing costs in investment trusts through adding to positions in down markets with selling pressure, reducing the average bid-offer spread.
- Margetts undertakes all administration functions directly which allows for service provision at lower cost.

## Findings and Comments

In view of the comments above we are satisfied that there is clear evidence that value is being provided.

	Blenheim Diversified Fixed Income	Blenheim Diversified Alternatives	Blenheim Ethical Opportunities	Blenheim Ethical Growth	Blenheim UK Equity	Blenheim Diversified Property	Blenheim Overseas Equity
Economies of Scale	A	A	A	A	A	A	A

## Classes of Shares Available

During this reporting period there have been two share classes available to new investors. The two share classes for each Sub-fund are 'B' and 'R'. The 'B' class is aimed at investors advised by Becketts and the 'R' class is more widely accessible.

Both share classes have accumulation and income options.

## Findings and Comments

There is no evidence that value has not been added.



	<b>Blenheim Diversified Fixed Income</b>	<b>Blenheim Diversified Alternatives</b>	<b>Blenheim Ethical Opportunities</b>	<b>Blenheim Ethical Growth</b>	<b>Blenheim UK Equity</b>	<b>Blenheim Diversified Property</b>	<b>Blenheim Overseas Equity</b>
Classes of Shares	B	B	B	B	B	B	B

## Appendix

### Return Statistics (sourced from Morningstar)<sup>11</sup>

Sub-fund	Comparator	1-year Sub-fund performance	1-year comparator performance	1-year added value	Sub-fund performance since date of first inflow <sup>12</sup>	Comparator performance since date of first inflow	Added value since date of first inflow	Minimum RHP Sub-fund performance (annualised)	Minimum RHP comparator performance (annualised)	Minimum RHP added value
Blenheim Diversified Fixed Income B Acc	IA £ Strategic Bond	3.11%	3.40%	-0.29%	-1.22%	-2.57%	1.35%	N/A	N/A	N/A
Blenheim Diversified Fixed Income B Inc	IA £ Strategic Bond	3.26%	3.40%	-0.14%	-1.17%	-2.57%	1.40%	N/A	N/A	N/A
Blenheim Diversified Fixed Income R Acc	IA £ Strategic Bond	2.89%	3.40%	-0.51%	-1.48%	-2.57%	1.09%	N/A	N/A	N/A
Blenheim Diversified Fixed Income R Inc	IA £ Strategic Bond	3.07%	3.40%	-0.33%	-1.38%	-2.57%	1.18%	N/A	N/A	N/A
Blenheim Diversified Alternatives B Acc	IA Targeted Absolute Return	-2.43%	3.21%	-5.64%	0.39%	5.29%	-4.90%	N/A	N/A	N/A
Blenheim Diversified Alternatives B Inc	IA Targeted Absolute Return	-2.425	3.21%	-5.63%	0.40%	5.29%	-4.89%	N/A	N/A	N/A
Blenheim Diversified Alternatives R Acc	IA Targeted Absolute Return	-2.62%	3.21%	-5.83%	-0.18%	5.29%	-5.47%	N/A	N/A	N/A
Blenheim Diversified Alternatives R Inc	IA Targeted Absolute Return	-2.59%	3.21%	-5.80%	-0.12%	5.29%	-5.41%	N/A	N/A	N/A
Blenheim Ethical Opportunities B Acc	IA 20-60% Shares	1.93%	1.76%	0.17%	0.69%	-0.68%	1.37%	N/A	N/A	N/A

<sup>11</sup> Rounding errors are possible in the data due to four decimal places being truncated into two decimal places.

<sup>12</sup> The date of first inflow for all Sub-funds was 19<sup>th</sup> January 2021.

Blenheim Ethical Opportunities B Inc	IA 20-60% Shares	1.92%	1.76%	0.16%	0.69%	-0.68%	1.37%	N/A	N/A	N/A
Blenheim Ethical Opportunities R Acc	IA 20-60% Shares	1.72%	1.76%	-0.05%	0.48%	-0.68%	1.16%	N/A	N/A	N/A
Blenheim Ethical Opportunities R Inc	IA 20-60% Shares	1.74%	1.76%	-0.02%	0.52%	-0.68%	1.20%	N/A	N/A	N/A
Blenheim Ethical Growth B Acc	IA 40-85% Shares	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Blenheim Ethical Growth B Inc	IA 40-85% Shares	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Blenheim Ethical Growth R Acc	IA 40-85% Shares	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Blenheim Ethical Growth R Inc	IA 40-85% Shares	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Blenheim UK Equity B Acc	IA UK All Companies	2.17%	0.24%	1.93%	2.11%	2.21%	-0.10%	N/A	N/A	N/A
Blenheim UK Equity B Inc	IA UK All Companies	2.18%	0.24%	1.94%	2.11%	2.21%	-0.10%	N/A	N/A	N/A
Blenheim UK Equity R Acc	IA UK All Companies	1.985	0.24%	1.74%	1.90%	2.21%	-0.32%	N/A	N/A	N/A
Blenheim UK Equity R Inc	IA UK All Companies	2.00%	0.24%	1.76%	1.91%	2.21%	-0.30%	N/A	N/A	N/A
Blenheim Diversified Property B Acc	IA Property Other	-1.40%	-2.44%	1.04%	-1.87%	-2.08%	0.21%	N/A	N/A	N/A
Blenheim Diversified Property B Inc	IA Property Other	-1.41%	-2.44%	1.03%	-1.865	-2.08%	0.22%	N/A	N/A	N/A
Blenheim Diversified Property R Acc	IA Property Other	-1.59%	-2.44%	0.85%	-2.50%	-2.08%	-0.42%	N/A	N/A	N/A
Blenheim Diversified Property R Inc	IA Property Other	-1.60%	-2.44%	0.84%	-2.34%	-2.08%	-0.26%	N/A	N/A	N/A
Blenheim Overseas Equity B Acc	IA Flexible Investment	1.65%	1.85%	-0.20%	0.30%	1.01%	-0.71%	N/A	N/A	N/A
Blenheim Overseas Equity B Inc	IA Flexible Investment	1.65%	1.85%	-0.20%	0.30%	1.01%	-0.71%	N/A	N/A	N/A
Blenheim Overseas Equity R Acc	IA Flexible Investment	1.40%	1.85%	-0.46%	0.05%	1.01%	-0.96%	N/A	N/A	N/A

Blenheim Overseas Equity R Inc	IA Flexible Investment	1.39%	1.85%	<b>-0.47%</b>	0.065	1.01%	<b>-0.95%</b>	N/A	N/A	N/A
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### Risk Statistics (sourced from FE Analytics)

Sub-fund	Comparator	Sub-fund drawdown since date of first flow	Comparator max drawdown since date of first flow	Difference	Sub-fund annualised volatility since date of first flow	Comparator annualised volatility since date of first flow	Difference
Blenheim Diversified Fixed Income B Acc	IA £ Strategic Bond	-10.63%	-15.68%	<b>5.05%</b>	3.42%	4.74%	<b>-1.32%</b>
Blenheim Diversified Fixed Income B Inc	IA £ Strategic Bond	-10.63%	-15.68%	<b>5.05%</b>	3.43%	4.74%	<b>-1.31%</b>
Blenheim Diversified Fixed Income R Acc	IA £ Strategic Bond	-10.87%	-15.68%	<b>4.81%</b>	3.42%	4.74%	<b>-1.32%</b>
Blenheim Diversified Fixed Income R Inc	IA £ Strategic Bond	-10.81%	-15.68%	<b>4.87%</b>	3.44%	4.74%	<b>-1.30%</b>
Blenheim Diversified Alternatives B Acc	IA Targeted Absolute Return	-8.83%	-2.75%	<b>-6.08%</b>	4.59%	2.55%	<b>2.04%</b>
Blenheim Diversified Alternatives B Inc	IA Targeted Absolute Return	-8.82%	-2.75%	<b>-6.07%</b>	4.59%	2.55%	<b>2.04%</b>
Blenheim Diversified Alternatives R Acc	IA Targeted Absolute Return	-9.07%	-2.75%	<b>-6.32%</b>	4.59%	2.55%	<b>2.04%</b>
Blenheim Diversified Alternatives R Inc	IA Targeted Absolute Return	-9.07%	-2.75%	<b>-6.32%</b>	4.59%	2.55%	<b>2.04%</b>
Blenheim Ethical Opportunities B Acc	IA 20-60% Shares	-10.37%	-13.77%	<b>3.40%</b>	6.30%	6.39%	<b>-0.09%</b>
Blenheim Ethical Opportunities B Inc	IA 20-60% Shares	-10.37%	-13.77%	<b>3.40%</b>	6.30%	6.39%	<b>-0.09%</b>
Blenheim Ethical Opportunities R Acc	IA 20-60% Shares	-10.54%	-13.77%	<b>3.23%</b>	6.30%	6.39%	<b>-0.09%</b>
Blenheim Ethical Opportunities R Inc	IA 20-60% Shares	-10.48%	-13.77%	<b>3.29%</b>	6.30%	6.39%	<b>-0.09%</b>
Blenheim Ethical Growth B Acc	IA 40-85% Shares	N/A	N/A	N/A	N/A	N/A	N/A

Blenheim Ethical Growth B Inc	IA 40-85% Shares	N/A	N/A	N/A	N/A	N/A	N/A
Blenheim Ethical Growth R Acc	IA 40-85% Shares	N/A	N/A	N/A	N/A	N/A	N/A
Blenheim Ethical Growth R Inc	IA 40-85% Shares	N/A	N/A	N/A	N/A	N/A	N/A
Blenheim UK Equity B Acc	IA UK All Companies	-19.45%	-17.72%	<b>1.73%</b>	11.82%	12.81%	<b>-0.99%</b>
Blenheim UK Equity B Inc	IA UK All Companies	-19.44%	-17.72%	<b>1.72%</b>	11.81%	12.81%	<b>-1.00%</b>
Blenheim UK Equity R Acc	IA UK All Companies	-19.64%	-17.72%	<b>1.92%</b>	11.81%	12.81%	<b>-1.00%</b>
Blenheim UK Equity R Inc	IA UK All Companies	-19.64%	-17.72%	<b>1.92%</b>	11.81%	12.81%	<b>-1.00%</b>
Blenheim Diversified Property B Acc	IA Property Other	-18.23%	-26.94%	<b>-9.46%</b>	7.68%	13.57%	<b>-5.89%</b>
Blenheim Diversified Property B Inc	IA Property Other	-18.23%	-26.94%	<b>-9.45%</b>	7.68%	13.57%	<b>-5.89%</b>
Blenheim Diversified Property R Acc	IA Property Other	-18.53%	-26.94%	<b>-9.31%</b>	7.68%	13.57%	<b>-5.89%</b>
Blenheim Diversified Property R Inc	IA Property Other	-18.42%	-26.94%	<b>-9.42%</b>	7.68%	13.57%	<b>-5.89%</b>
Blenheim Overseas Equity B Acc	IA Flexible Investment	-15.58%	-13.32%	<b>2.26%</b>	12.49%	8.36%	<b>4.13%</b>
Blenheim Overseas Equity B Inc	IA Flexible Investment	-15.57%	-13.32%	<b>2.25%</b>	12.49%	8.36%	<b>4.13%</b>
Blenheim Overseas Equity R Acc	IA Flexible Investment	-15.70%	-13.32%	<b>2.38%</b>	12.49%	8.36%	<b>4.13%</b>
Blenheim Overseas Equity R Inc	IA Flexible Investment	-15.77%	-13.32%	<b>2.45%</b>	12.49%	8.36%	<b>4.13%</b>

## Charging Statistics

Share Class	AMC	Synthetic OCFs	Other Charges	OCF
Blenheim Diversified Fixed Income B Acc	0.10%	0.40%	0.05%	0.55%
Blenheim Diversified Fixed Income B Inc	0.10%	0.40%	0.05%	0.55%
Blenheim Diversified Fixed Income R Acc	0.35%	0.40%	0.05%	0.80%
Blenheim Diversified Fixed Income R Inc	0.35%	0.40%	0.05%	0.80%
Blenheim Diversified Alternatives B Acc	0.10%	0.75%	0.00%	0.85%
Blenheim Diversified Alternatives B Inc	0.10%	0.75%	0.00%	0.85%
Blenheim Diversified Alternatives R Acc	0.35%	0.75%	0.00%	1.10%
Blenheim Diversified Alternatives R Inc	0.35%	0.75%	0.00%	1.10%
Blenheim Ethical Opportunities B Acc	0.10%	0.69%	0.00%	0.79%
Blenheim Ethical Opportunities B Inc	0.10%	0.69%	0.00%	0.79%
Blenheim Ethical Opportunities R Acc	0.35%	0.69%	0.00%	1.04%
Blenheim Ethical Opportunities R Inc	0.35%	0.69%	0.00%	1.04%
Blenheim UK Equity B Acc	0.10%	0.52%	0.00%	0.62%
Blenheim UK Equity B Inc	0.10%	0.52%	0.00%	0.62%
Blenheim UK Equity R Acc	0.35%	0.52%	0.00%	0.87%
Blenheim UK Equity R Inc	0.35%	0.52%	0.00%	0.87%
Blenheim Diversified Property B Acc	0.10%	0.90%	0.01%	1.01%
Blenheim Diversified Property B Inc	0.10%	0.90%	0.01%	1.01%
Blenheim Diversified Property R Acc	0.35%	0.90%	0.01%	1.26%
Blenheim Diversified Property R Inc	0.35%	0.90%	0.01%	1.26%
Blenheim Overseas Equity B Acc	0.10%	0.63%	-0.02%	0.71%
Blenheim Overseas Equity B Inc	0.10%	0.63%	-0.02%	0.71%
Blenheim Overseas Equity R Acc	0.35%	0.63%	-0.02%	0.96%
Blenheim Overseas Equity R Inc	0.35%	0.63%	-0.02%	0.96%

## Yield Statistics

<b>Sub-Fund</b>	<b>12-month yield to 30/11/2023</b>
Blenheim Diversified Fixed Income B Acc	3.44%
Blenheim Diversified Fixed Income B Inc	3.52%
Blenheim Diversified Fixed Income R Acc	3.47%
Blenheim Diversified Fixed Income R Inc	3.60%
Blenheim Diversified Property B Acc	2.76%
Blenheim Diversified Property B Inc	2.80%
Blenheim Diversified Property R Acc	2.55%
Blenheim Diversified Property R Inc	2.61%