



investment architecture

**TM CASTLEFIELD THOUGHTFUL GROWTH  
PORTFOLIO FUND**

# **Assessment of Value Report**

For the year ended

**31 December 2025**

This Unit Trust Management Limited is authorised and regulated by the Financial Conduct Authority.

**tutman.co.uk**

## Fund Information

---

<b>Fund objective:</b>	The investment objective of the Fund is to achieve growth in value through a combination of capital growth and income, net of fees, over the long term. Long term means over rolling five year periods.
<b>Fund size:</b>	£111,168,693
<b>Performance Comparator:</b>	IA Mixed Investment 40-85% Shares

---

## Assessment of Value

The Board of the Authorised Fund Manager (AFM) is required to perform an annual Assessment of Value for each share class within the fund and to report its findings to investors.

The Assessment of Value places a responsibility on the AFM to determine whether the fees and charges of the fund are justified in the context of the overall service and value provided to investors.

Following the introduction of the Assessment of Value requirement in 2019 the AFM now has four independent non-executive directors appointed with a particular remit to oversee and challenge the Assessment of Value process conducted in relation to the fund.

In this Assessment of Value report, we have used a traffic light system whereby:



**The fund has delivered value to investors**



**The fund has delivered some value to investors but action may be needed to improve value delivery**



**The fund has not delivered value to investors and action is needed before value will be delivered**

## Independent AFM model - terminology

The AFM has the regulatory responsibility for all aspects of the fund operations including the actions of its delegates. Its role requires a focus on good investor outcomes, investor protection, oversight, compliance and general regulatory matters.

The Investment Manager is appointed by the AFM and has the full discretion to manage the assets of the portfolio in accordance with the fund's objective and investment policy. The Investment Manager is the entity which delivers out- or under-performance on behalf of investors. It is the entity which in turn receives the greatest share of the Annual Management Charge.

The Investment Manager and the AFM can be part of the same organisation or separate. When they are separate the fund can be described as having an Independent AFM which is the case with the TM CASTLEFIELD THOUGHTFUL GROWTH PORTFOLIO FUND

## Background to our firm - Independent AFM

Thesis Unit Trust Management Limited is a specialist provider of independent AFM services. Our approach to delivering good outcomes for investors in our funds, from the initial design phase and throughout the fund life cycle, is based upon having the right blend of experience, culture and governance.

We choose to work with a variety of service providers (fund accountants, depositaries, transfer agents and auditors) and provide independent, bespoke and flexible solutions. By outsourcing day-to-day activity to specialist providers our teams can focus on investor outcomes, risk management, oversight, product governance and regulatory change.

We delegate fund servicing to a panel of reputable institutions. Consequently, we have an informed view of this part of the supply chain. We benchmark those fund servicers against a range of criteria including service and cost. We build close relationships with our delegates at all levels within our respective organisations allowing for effective escalation when appropriate and always with the best interests of investors in mind. We are also able to change a service provider with relative ease as and when required to improve quality of service, reduce cost or for other strategic or operational reasons.

We delegate investment management to a wide range of firms who utilise different strategies and investment techniques. As such we have a broad and informed view of the investment management marketplace and independently benchmark across a range of criteria including service, performance and costs. Coming from a fund management background we have qualified investment managers and research analysts within our AFM business who have the experience to monitor fund performance and challenge third party investment managers on behalf of investors in the funds.

## Overall Assessment of Value

Following our assessment, the board of Thesis Unit Trust Management Limited has concluded its assessment of value for each share class as follows:

	Quality of service	Performance	Costs	Economies of Scale	Comparable market rates	Comparable services	Classes of shares	Overall
TM Castlefield Thoughtful Gr Port F Inc	●	●	●	●	●	●	●	●
TM Castlefield Thoughtful Gr Port G Inc	●	●	●	●	●	●	●	●
TM Castlefield Thoughtful Gr Port C Inc	●	●	●	●	●	●	●	●
TM Castlefield Thoughtful Gr Port E Inc	●	●	●	●	●	●	●	●

The following pages detail how we assessed each criteria and our overall assessment along with any detail on any action we may take.



## Independent AFM - service and costs

---

In assessing the quality and cost of our independent AFM service we judge whether our AFM fee is competitive and can be justified based on feedback from independent consultants, our clients who select us and when existing funds move to us from our competitors.

We also review our operation and compliance of the fund (including the number of errors and investor complaints), results from the depositary's inspection and audit of our AFM arrangements, and other factors such as the implementation of regulatory change at no cost to investors.

Over the latest period there were some incidents as we transitioned the fund between our ACD entity ConBrio to Thesis Unit Trust Management and, as such, we assess our Quality of Service to the fund as Amber on this occasion.

---



## Service provider and costs

---

Separately we assess the quality and cost of the outsourced fund service providers. Examples of the criteria that we considered included Key Performance Indicators in the key areas including pricing, delivery of statements, delivery of report and accounts, and investor complaints.

Whilst we have assessed that the service providers' fees are competitive and provide value to investors by benchmarking against the other service providers on our panel, during the latest period a communications incident by SS&C, the administrator, gives rise for us to rate this period's service quality at Amber.

---

## Investment manager services and costs

---

It is our judgement that the experience of investors in the fund and an assessment of whether the fund has delivered value is most directly impacted by the services, performance and costs that are attributable to the Investment Manager.

Further details of our value assessment, with a particular focus on the Investment Manager, is shown below:

---



## Quality of service

---

*The range and quality of service delivered by the Investment Manager including the experience of the team, track record, quality of relationship with our AFM team, and the results from our governance and oversight arrangements.*

We monitor the Investment Manager on a daily basis, and maintain frequent contact with them on a range of aspects of their work including adherence with the investment mandate and policy, liquidity management, and fair value pricing as well as regulatory compliance. We have more formal contact quarterly and further periodic reviews on a thematic basis.

The Investment Manager generally continues to meet our requirements and provide a good quality of service although a couple of incidents relating to the changes to the funds portfolio have caused us to assess their quality of service as Amber on this occasion.

---



## Costs

---

*Whether the charges are reasonable compared with the costs of providing the service (considering factors such as the size of the Investment Manager, its balance sheet strength and profit margins).*

At a fund size of £111,168,693 we are satisfied that the costs charged to the fund are reasonable given its size and a holistic assessment of the benefits that accrue to its investors.



## Economies of Scale

The AFM, Administrator, Depository and Investment Manager of the fund have all set fees on a tiered basis, at appropriate levels, and from which the fund is benefitting.



## Comparable services

The Investment Managers' charges for comparable services to other investors are in line with the charges borne by this fund.

## Performance



*Whether the fund has provided good performance, net of fees, in relation to its investment objective. We have considered performance against the fund's benchmark and/or appropriate peer group, compliance with investment policy, volatility and liquidity, and any evidence of closet tracking.*

### Investment Performance

The fund is being actively managed in accordance with the investment objective and policy. Performance number/s are shown below along with that of the Comparator

Share classes in issue	One Year	Three Years	S.I.	Five Years	--	--	--	--	--
	31/12/24 31/12/25	31/12/22 31/12/25	03/07/22 31/12/25	31/12/20 31/12/25	--	--	--	--	--
TM Castlefield Thoughtful Gr Port F Inc	6.4%	12.9%	--	13.3%	--	--	--	--	--
TM Castlefield Thoughtful Gr Port G Inc	6.2%	12.1%	--	11.9%	--	--	--	--	--
TM Castlefield Thoughtful Gr Port C Inc	6.4%	12.9%	14.1%	--	--	--	--	--	--
TM Castlefield Thoughtful Gr Port E Inc	6.7%	13.7%	15.1%	--	--	--	--	--	--
<b>Performance Comparator</b>									
IA Mixed Investment 40-85% Shares	11.6%	31.4%	32.6%	31.2%	--	--	--	--	--



All performance numbers (incl. foreign currency share classes and indices) are Total Return (net income reinvested) and in GBP unless stated otherwise.

The fund's share classes with five years of performance have underperformed the comparator detailed in the prospectus although we note the statement therein referencing the investment manager's Thoughtful investment process and how this can see performance deviate to peers. We therefore also considered performance versus other exclusionary funds from the broader comparator peer group. Our overall performance assessment is based on considering the above returns alongside the manager delivering their Thoughtful investment process to investors which we detail below.

### Whether the fund has met other aspects as set out in its objective and policy







Although not a labelled fund under the FCA's new Sustainability Disclosure Requirements 'Thoughtful' in the name of the fund refers to the specific detail in the fund's investment policy which frames the Investment Manager's investment process. We therefore run a quarterly check on the fund's investments against the exclusions and measurables detailed therein and have assessed that the fund is invested in line with this part of its objective and policy.

## Comparable market rates

*Whether the charges are comparable with similar funds in this sector of the market.*

The AFM uses a peer group to compare the overall cost of this fund. The peer group has been selected for cost comparison purposes because the asset parameters (or objective in the case of absolute return funds) for its constituent funds are closely aligned to those of this fund. The peer group may include funds managed under a range of strategies. Where the peer group includes funds managed wholly or materially through investment in passive assets, these will generally have lower costs than actively managed funds, which are typically more expensive. Similarly, where the peer group includes active funds managed wholly or materially through investment in other funds, these are typically more expensive than directly invested funds. Explicit index tracking funds are removed from the peer group.

Share classes in issue	OCF		
TM Castlefield Thoughtful Gr Port F Inc	0.85		It is our assessment that the OCF of this share class is lower or within an allowable tolerance of the OCFs of other similar funds in the market
TM Castlefield Thoughtful Gr Port G Inc	1.02		It is our assessment that the OCF of this share class is lower or within an allowable tolerance of the OCFs of other similar funds in the market
TM Castlefield Thoughtful Gr Port C Inc	0.85		It is our assessment that the OCF of this share class is lower or within an allowable tolerance of the OCFs of other similar funds in the market
TM Castlefield Thoughtful Gr Port E Inc	0.44		It is our assessment that the OCF of this share class is lower or within an allowable tolerance of the OCFs of other similar funds in the market
<b>Peers</b>	<b>Average OCF</b>		
IA Mixed Investment 40-85% Shares	0.84		



## Classes of shares

*As an independent AFM we operate multiple funds with differing share classes but within this criteria we consider the range of share classes available in the fund, their differences (such as charges) and whether investors are in the appropriate share classes.*

Excluding the E shares, which are for employees of the Investment Manager, there is a 17bp differential between the AMC/OCFs of the share class range. The lower AMC/OCF share classes are for specific investors and/or investors who meet larger minimum initial investment criteria. These differentials are considered reasonable and justifiable on the basis that founder or larger investors increase the fund size and the potential for economies of scale, with reduced operational workload and risk.

## Overall Assessment of Value

Following our assessment, the board of Thesis Unit Trust Management Limited has concluded its assessment of value for each unit class as follows:

TM Castlefield Thoughtful Gr Port F Inc		Has delivered some value to investors but action may be needed on value delivery
TM Castlefield Thoughtful Gr Port G Inc		Has delivered some value to investors but action may be needed on value delivery
TM Castlefield Thoughtful Gr Port C Inc		Has delivered some value to investors but action may be needed on value delivery
TM Castlefield Thoughtful Gr Port E Inc		Has delivered some value to investors but action may be needed on value delivery

The fund is delivering some value to investors. We will continue to monitor performance and challenge the investment manager on charges.