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investment architecture

Evelyn Witch General Trust

Assessment of Value Report

For the year end

15 July 2025

Assessment of Value Process

As part of a move to strengthen fund governance, the FCA requires Authorised Fund Managers (AFMs) such as Tutman Fund Solutions Limited ('TFSL')[1] to carry out and publish an annual Assessment of Value (AOV) Report for each of the funds that they control.

The report outlines each fund's assessment and concludes whether the TFSL Board believes that the fund's payments are justified in the context of the overall value delivered to investors. The report also explains the corrective action required in the event of the Board deciding that the fund does not offer value for investors.

The TFSL Board, whose chair is a Non-Executive Director (NED) and includes Independent Non-Executive Directors (INED), must ensure that the AFM carries out the FCA assessment and acts in the best interests of the investors.

TFSL believes that the AOV process provides greater transparency and ultimately provides better outcomes for investors. To support the ongoing evolution of our AOV reporting, TFSL had sought additional guidance from the Funds Board Council to review and strengthen our process.

The TFSL AOV Committee consists of our INEDs, Executive Directors and members of the Leadership Team (including the Head of ACD Services), the Head of Funds Compliance and members of the AOV team (as presenters) and Client Service Management (as observers) to ensure a collaborative independent approach.

The published AOV report, which follows the seven criteria set out by the FCA, is the result of a rigorous review process. This process includes a review by a dedicated TFSL Investment Committee, whose main focus is to review the performance of the fund, plus a full review by the Assessment of Value Committee which reviews the completed assessment, and the data used to support all conclusions. TFSL uses third-party systems to ensure that comparative data is relevant and up to date. At the end of each section, TFSL awards a Red, Amber or Green (RAG) status to determine the assessment for each fund.

[1] On 30 June 2025, Thesis Holdings Limited bought Evelyn Partners Fund Solutions Limited. Following the completion of the acquisition of Evelyn Partners Fund Solutions Limited, the company has been renamed to Tutman Fund Solutions Limited.

Background

In line with the provisions contained within COLL 6.6.20R, the Board of Tutman Fund Solutions Limited ('TFSL') as Authorised Fund Manager ('AFM'), has carried out an Assessment of Value for Evelyn Witch General Trust ('the Trust'). Furthermore, the rules require that TFSL publishes these assessments.

On reviewing this Assessment of Value report, we would welcome feedback from investors via our short questionnaire which can be found online.

https://www.tutman.co.uk/literature/

Investors' views are invaluable to the development and delivery of this report.

Should you be unable to access the questionnaire online please contact us directly on 0141 483 9700 and we will provide you with a paper copy of the questionnaire.

Introduction

A high-level summary of the outcome of TFSL's rigorous review of the Trust, for the year ended 15 July 2025, using the seven criteria set by the FCA is set out below:

1. Quality of Service		
2. Performance		
3. AFM Costs		
4. Economies of Scale		
5. Comparable Market Rates		
6. Comparable Services		
7. Classes of Units		
Overall Rating		

TFSL has adopted a traffic light system to show how it rated the Trust:

 On balance, the Board believes the Trust has delivered value to investors, with no material issues noted.

 On balance, the Board believes the Trust has delivered value to investors, but may require some action.

 On balance, the Board believes the Trust has not delivered value to investors and significant remedial action is now planned by the Board.

How TFSL assessed each of the seven criteria and the resulting rating are discussed in greater detail on the following pages.

TFSL has created an Assessment of Value Committee ('AVC'), for the review, challenge and approval of all the funds' Assessments of Value. Ultimately the assessments will be subject to scrutiny by the Board (which includes independent directors) to ensure the outcomes of the assessments are clear and fair, prior to communicating to investors if the Trust has delivered value, and if not, where improvements need to be made.

In carrying out the assessment, the TFSL AVC has separately considered, the following seven criteria stipulated by the FCA. The Committee may also have considered other issues where it was deemed appropriate.

TFSL believes the Assessment of Value can make it easier for investors to both evaluate whether the Trust is providing them with value for money and make more informed decisions when choosing investments.

The seven criteria are:

(1) Quality of service – the quality of every aspect of the service provided, including, for example, accounting, administration, customer services and communications;

(2) Performance – how the Trust performed, including whether it met targets and objectives, kept to relevant policy, followed relevant principles and kept to reasonable timescales;

(3) AFM costs – the fairness and value of the Trust's costs, including entry and exit fees, early redemption fees and administration charges;

(4) Economies of scale – how costs have been or can be reduced as a result of increased assets-under-management ('AUM'), and whether or not those savings have been passed on to investors;

(5) Comparable market rates – how the costs of the Trust compare with others in the marketplace;

(6) Comparable services – how the charges applied to the Trust compare with those of other funds administered by TFSL;

(7) Classes of Units – the appropriateness of the classes of units in the Trust for investors.

Section 1: Quality of Service

What was assessed in this section?

Internal Factors

TFSL, as AFM, has overall responsibility for the Trust. The Board assessed, amongst other things: the day-to-day administration of the Trust; the maintenance of scheme documentation (such as prospectuses and key investor information documents ('KIIDs')); the pricing and valuation of units; the calculation of income and distribution payments; the maintenance of accounting and other records; the preparation of annual audited and half-yearly Report & Accounts; the review of tax provisions and submission of tax computations to HMRC; the maintenance of the register of investors; the dealing and settlement arrangements; and the quality of marketing material sent to investors. TFSL delegates the investment management of the Trust to a delegated investment management firm.

The Board reviewed information provided by TFSL's control functions on the adequacy of its internal services, including governance, operations and monitoring. Elements important to the investors' experience such as the timely payment of settlement and distribution monies were also reviewed. Over the past year, TFSL has been audited by internal and external auditors, the Trustee and various TFSL delegated investment managers.

External Factors

The Board assessed the delegate's skills, processes and experience. Also considered were any results from service review meetings as well as the annual due diligence performed by TFSL on the delegated investment manager, Evelyn Partners Investment Management, where consideration was given to, amongst other things, the delegate's controls around the Trust's liquidity management.

The Board also considered the nature, extent and quality of administrative and investor services performed under separate agreements covering trustee services, custody, as well as services provided with regard to both audit and legal functions.

What was the outcome of the assessment?

Internal Factors

The Board recognised that all distribution and settlement monies were paid in a timely manner and that there were no significant findings as a result of the various audits performed on TFSL during the year. In addition, TFSL has performed its own independent analysis, using

automated systems, of the Trust's liquidity. The Board concluded that TFSL had carried out its duties diligently.

External Factors

The Board concluded that the nature, extent and quality of the services provided by the external parties have benefitted and should continue to benefit the Trust and its investors.

Were there any follow up actions?

There were no follow-up actions required.

Section 2: Performance

What was assessed in this section?

The Board reviewed the performance of the Trust, after the deduction of all payments out of the scheme property as set out in the Prospectus. Performance, against its benchmark, was considered over appropriate timescales having regard to the Trust's investment objective, policy and strategy. The Board also considered whether an appropriate level of market risk had been taken.

Investment Objectives

The objective of the Trust is to achieve long-term growth of capital through investment in UK and international financial markets.

Benchmark

As AFM, TFSL is required to explain in a fund's scheme documentation why a benchmark is being used or alternatively, explain how investors should assess performance of a fund in the absence of a benchmark.

The benchmark for the Trust is the MSCI PIMFA Growth Index, which is comparator. A 'comparator' benchmark is an index or similar factor against which an investment manager invites investors to compare a fund's performance. Details of how the Trust had performed against its comparator benchmark over various timescales can be found below.

Cumulative Performance (%) **Cumulative Performance as at 31/07/2025**

Year End 15/07/2025

Instrument	Currency	1 year	3 years	5 years
Evelyn Witch General Trust	GBP	8.70	28.23	41.30
MSCI PIMFA Growth Index	GBP	10.42	31.54	62.79

Data provided by FE fundinfo. Care has been taken to ensure that the information is correct but it neither warrants, represents nor guarantees the contents of the information, nor does it accept any responsibility for errors, inaccuracies, omissions or any inconsistencies herein.

Performance shown is representative of all unit classes.
Performance is calculated net of fees.
Past performance is not a guide to future performance.

What was the outcome of the assessment?

The Board assessed the performance of the Trust over its minimum recommended holding period of five years and observed that it has continue to underperform its comparator benchmark, the MSCI PIMFA Growth Index.

The Board assessed the investment risk within the Trust, focusing amongst other things on volatility and risk adjusted returns and concluded that the level of investment risk is within parameters for an actively managed Trust.

The Board found that the Trust is investing in the asset classes permitted by the investment policy and that there have been no breaches of the policy in the last 12 months.

Given the above analysis the Board felt that a RED rating was appropriate.

Were there any follow up actions?

TFSL will continue to monitor performance. The investment manager has stated that Discussions will occur with the underlying unitholders to ensure that the current benchmark is appropriate. An application to change the comparator benchmark, to one which more accurately reflects the investor's objectives and risk profile, is being prepared.

Section 3: AFM Costs

What was assessed in this section?

The Board reviewed each separate charge to ensure that they were reasonable and reflected the services provided. This included investment management fees, the Annual Management Charge ('AMC'), trustee, custody and audit fees.

The charges should be transparent and understandable to the investors, with no hidden costs.

What was the outcome of the assessment?

The Board received and considered information about each of the Trust's costs, and concluded that they were fair, reasonable and were provided on a competitive basis.

Were there any follow up actions?

There were no follow-up actions required.

Section 4: Economies of Scale

What was assessed in this section?

The Board reviewed each separate fee structure and the AUM of the Trust to examine the effect on potential and existing investors should the Trust increase or decrease in value.

What was the outcome of the assessment?

The Annual Management Charge (AMC) is tiered meaning there are opportunities for savings going forward should the Trust grow in size.

The ancillary charges[2] of the Trust represent 19 basis points[3]. Some of these costs are fixed and as the Trust grows in size, may result in a small reduction in the basis point cost of these services.

Were there any follow up actions?

There were no follow-up actions required.

[2] Ancillary charge is any charge paid directly out of the sub-fund in addition to the AMC, e.g., Auditor, Custodian or Depositary fees.

[3] One **basis point** is equal to 1/100th of 1%, or 0.01%. Figure calculated at annual reporting date, 15 July 2025

Section 5: Comparable Market Rates

What was assessed in this section?

The Board reviewed the Ongoing Charges Figure of the Trust, ('OCF'), and how those charges affect its returns.

The OCF of the Trust was compared against the 'market rate' of similar external funds.

What was the outcome of the assessment?

The OCF of 1.24%[4] was more expensive than those of similar externally managed funds.

Note that there is not a performance fee and that TFSL has not charged an entry fee, exit fee or any other event-based fees on this Trust.

Were there any follow up actions?

There was no further action required as the Board were of the opinion that the size of the Trust was adversely impacting the Fund's OCF.

Section 6: Comparable Services

What was assessed in this section?

The Board compared the Trust's investment management fee with those of other funds administered by TFSL and of equivalent size, investment objectives and policies.

What was the outcome of the assessment?

The investment management fee was more expensive than other TFSL administered funds displaying similar characteristics. The investment management fee is unchanged from last year's review, however it was noted that the median investment management fee of the peer group had fallen during the review period. As a result, this section was given an Amber rating.

[4] Figures at annual reporting date, 15 July 2025

Were there any follow up actions?

Though the investment management fee was more expensive, relative to other schemes, the Board were of the opinion that there was no cause for concern.

Section 7: Classes of Units

What was assessed in this section?

The Board reviewed the Trust's set-up to ensure that where there are multiple unit classes, direct investors are in the correct class given the size of their holding.

What was the outcome of the assessment?

There is only one unit class in the Trust and therefore, this part of the assessment does not apply.

Were there any follow up actions?

There were no follow-up actions required.

Overall Assessment of Value

The Board considered all the information provided above and concluded that Evelyn Witch General Trust had provided value to investors but merits further action to address the relative gap to the comparator benchmark's performance.