



Positive Impact Portfolios MPS Value Assessment

May 2025

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Introduction

Overview

This report is designed to help you see whether EQ Investors (EQ) is delivering fair value for its clients. We carry out fair value assessments at least annually, in line with our product governance process. The fair value assessment statement provides you with the outcomes and conclusions of the value provided to advisers and clients under Consumer Duty.

In completing this assessment, EQ has evaluated the value provided to advisers and clients by the Positive Impact Portfolios MPS across several key criteria, including the financial and non-financial benefits received, the performance and quality of the support and the pricing of the proposition.

The Board is focused on the best interest of EQ's end-clients, and we believe that the Consumer Duty, and the assessment of value more specifically, is an important method of evidencing this.

Reasons for assessment:

To assess the value of the Positive Impact Portfolios Model Portfolio Solution (MPS) that we manufacture.

Name of person(s) completing this assessment:

- Sophie Kennedy (Joint CEO)
- Tertius Bonnin (Portfolio Manager)

Summary of findings

This Value Assessment covers the 12 months up to 31 March 2025.

The overall assessment is that the Positive Impact Portfolios MPS continues to deliver fair value for advisers and clients in the target market:

- ✓ The product remains consistent with the needs of the identified target market.
- ✓ The product provides fair value to clients within the target market and should provide good outcomes to clients.
- ✓ The intended distribution strategy remains appropriate.

Portfolio	Value Assessment
Positive Impact Defensive Portfolio	3: Satisfactory
Positive Impact Cautious Portfolio	2: Good
Positive Impact Cautious Plus Portfolio	2: Good
Positive Impact Balanced Portfolio	2: Good
Positive Impact Balanced Plus Portfolio	2: Good
Positive Impact Adventurous Portfolio	2: Good
Positive Impact Adventurous Plus Portfolio	2: Good
Positive Impact All Equity Portfolio	2: Good

Key:

- 1: Excellent, this product has delivered excellent value to its customers
- 2: Good, this product has delivered above average value to its customers
- 3: Satisfactory, this product has delivered value to its customers
- 4: Needs improvement, this product has not delivered value to its customers

Product details

This is a Model Portfolio Solution.

It offers active portfolios for clients aiming to maximise their impact & returns. These portfolios invest in companies whose products and services help solve social and environmental problems. These are multi-asset portfolios of actively managed funds running dedicated impact strategies. They offer detailed reporting using environmental and social metrics.

Portfolio objectives:

1. Deliver long-term capital growth.
2. Maximise alignment to positive impacts on the world's significant environmental and social challenges.

Key features:

The key features of the MPS are:

- An active investment approach.
- A diversified portfolio of funds with exposure to companies providing products & services to solve social or environmental challenges, creating an intentional, material, and additional impact on the UN Sustainable Development Goals (SDGs) as well as satellite exposure to companies with strong ESG credentials.
- Naturally avoids most controversial sectors and business activities preventing progress towards the UN SDGs.
- Sustainability reporting includes impact reporting, impact calculator, carbon foot printing, carbon calculator, UN SDG alignment and quarterly case studies.

Key benefits:

The financial and non-financial benefits of the MPS product include (albeit not an exhaustive list):

- Risk adjusted financial returns dependent on risk profile (8 risk profiles available).
- Aligning investments to sustainability preferences and values.
- Contributing to changes in real world outcomes through stewardship which includes voting and engagement with fund managers and directly through industry initiatives.
- Low minimum investment requirements.
- Available on multiple platforms.
- High liquidity allows clients to access their investments when needed.
- Access to sustainability investment professionals & market commentary from specialist investment team highlighting performance drivers, market update and macroeconomic environment.
- Significant reporting includes carbon footprinting, carbon calculator, UN SDG alignment, impact reporting & calculator, engagement progress reporting and quarterly case studies.
- Sustainability education and support for advisers and their clients.

Limitations:

- The MPS has no investor input or control over the underlying assets within the portfolio – this will be managed on a collective, not an individual basis.
- No non-advised or execution only transactions will be accepted for any option.
- This MPS is not suitable for clients seeking a pure passive investment management style.

Target market

Please see EQ MPS: Target Market Assessment for more information.

Identified Target Market:

A retail client with sustainability preferences:

- ✓ Basic knowledge of relevant financial instruments, no financial industry experience so suited to a first-time investor.
- ✓ An Informed Investor with some knowledge of relevant financial instruments or financial industry experience.
- ✓ An Advanced Investor with good knowledge of financial instruments of financial industry experience.

Detail the needs, characteristics & objectives of the target market:

This proposition is designed for retail clients with the following characteristics, needs & objectives:

- ✓ Capital growth
- ✓ Sustainability preferences
- ✓ Longer time horizon
- ✓ This product caters for clients with different risk appetites.

This proposition is not appropriate for:

- ✗ Clients wishing to invest directly in individual company shares or corporate bonds or in esoteric investments such as derivatives, crypto, unregulated, or non-traditional investments.
- ✗ Clients who cannot bear any loss of capital or limited losses.
- ✗ Potential CGT / Income Tax / IHT issues.

Vulnerability

Identify any characteristics of vulnerability in the target market which may impact the value received by those customers.

The characteristics of vulnerability in the target market have been identified and may include (this is not an exhaustive list):

- Lack of understanding or experience.
- Low resilience to loss due to lower level of savings.
- Inability to work through poor health.
- Deteriorating physical or mental health issues.

Could the customers vulnerabilities or cognitive / behavioural biases impact the full value of the product?

All clients will come to EQ via an authorised financial adviser, who should manage the customers vulnerability or cognitive / behavioural biases accordingly to ensure that this will not impact the value of the product.

EQ has a Vulnerable Client policy which is adhered to, however when acting through an Agent as Client agreement, EQ does not have oversight of the end client.

How do we make the client facing material we produce accessible to different investor groups?

All client facing marketing materials are reviewed for understandability and accuracy, with particular focus placed on accessibility of language, simplification of investment jargon, and accuracy of claims as it relates to the FCA's anti-greenwashing rules.

Nature of the product

Does the design of the product (the key features) enable use by the target market ensuring they are able to pursue their financial objectives?

The design of the product enables use by the target market, ensuring they can pursue their financial objectives.

We have completed a Manufacturer Assessment of our Proposition. This involved identifying our target market, documenting our proposition, and assessing how our proposition meets the needs of our target markets.

This is a model portfolio solution with the following design elements:

- Maximising alignment to businesses with intentional, material, additional and measurable positive impacts on the UN Sustainable Development Goals. Assessed through proprietary "best practice" impact fund selection criteria by a well-resourced investment and research team.
- Analysis of data includes UN SDG contribution, absolute impact metrics, ESG metrics, climate metrics, negative product involvement.
- Input from EQ's Strategic Asset Allocation framework
- Engagement activity at fund and direct holding level to drive change in real world sustainability outcomes.
- Measurement, monitoring, and reporting on sustainability characteristics
- Continued innovation of product and support to remain market leading.

Do any aspects/ limitations of the product prevent the average target market customer from fully enjoying the product?

None of the identified limitations of the product prevent the average target market customer from fully enjoying the product.

Does the product allow for comparison to other products in the market?

Yes, this product has been compared to other MPS products in the market, including the MIFID II costs and charges and the Investment Management Fee.

Please see below for more information on the comparison.

Does the product allow for easy switching to another provider or product?

Yes, this product is available on platform and therefore allows for easy switching to another provider or product.

Assessment of Value

The Assessment of Value is based on:

- ✓ Performance; Financial & Non-financial
- ✓ Cost: Ongoing Charges Fee (OCF) of the underlying funds held in the model portfolios, MPS discretionary management fee
- ✓ Quality of the support

Performance: Financial

Are the distributions of the actual financial returns of the product in line with the distribution of benchmark returns over 1, 3 & 5 years?

The performance of the portfolios over 1, 3 and 5 years has been compared to that of a comparator benchmark, the appropriate IA benchmark.

Portfolio	Performance: Value Assessment
Positive Impact Defensive Portfolio	3: Satisfactory
Positive Impact Cautious Portfolio	3: Satisfactory
Positive Impact Cautious Plus Portfolio	2: Good
Positive Impact Balanced Portfolio	2: Good
Positive Impact Balanced Plus Portfolio	2: Good
Positive Impact Adventurous Portfolio	2: Good
Positive Impact Adventurous Plus Portfolio	2: Good
Positive Impact All Equity Portfolio	2: Good

Performance: Non-financial

Review the performance and quality of the support provided, including in relation to customer feedback and complaints.

The performance and quality of support is deemed to be Good. This analysis is based on:

- Adherence to the non-financial objectives
- Annual consumer testing of intermediaries (through annual surveys)
- Customer experience and satisfaction including website usage, online portal support, quality of adviser and client education and support, award wins.
- Management information including operational and technology performance indicators including trade and administration errors, complaints data, ad hoc feedback and testimonials.

Pricing

Identify and compare the market rate for the product?

The market rate for the product has been identified based on a relevant competitor peer group. This analysis has been conducted on the underlying fund fees within the product (OCF) & the DFM Investment Management Charge, which when combined give an indication of the Total Costs & Charges figure.

Differential pricing is used by the firm. It is structured to lower the DFM charge dependent on the total assets managed by EQ, by adviser firm. This creates a transparent fee structure for all advisers and clients with no preferential rates for certain firms or advisers.

The tiered pricing provides scale and ability to benefit from cost savings as EQ's AUM grows. As we benefit from economies of scale, we pass that saving on to advisers and in turn, end clients. Over the last four years, EQ has consistently reduced the DFM charge as we have grown.

Quartile analysis on Total Costs & Charges (TCC)

Portfolio	Overall assessment	TCC analysis: Value Assessment by pricing tier				
		<£5 million	£5 – 15 million	£15 – 30 million	£30 – 60 million	> £60 million
Positive Impact Defensive Portfolio	3: Satisfactory	4 th	3 rd	2 nd	2 nd	2 nd
Positive Impact Cautious Portfolio	2: Good	2 nd	2 nd	2 nd	1 st	1 st
Positive Impact Cautious Plus Portfolio	2: Good	2 nd	2 nd	1 st	1 st	1 st
Positive Impact Balanced Portfolio	2: Good	2 nd	2 nd	2 nd	1 st	1 st
Positive Impact Balanced Plus Portfolio	2: Good	2 nd	2 nd	1 st	1 st	1 st
Positive Impact Adventurous Portfolio	2: Good	2 nd	2 nd	2 nd	1 st	1 st
Positive Impact Adventurous Plus Portfolio	2: Good	2 nd	2 nd	2 nd	2 nd	2 nd
Positive Impact All Equity Portfolio	1: Excellent	2 nd	2 nd	1 st	1 st	1 st

For all pricing information, including the MPS discretionary management fee, underlying fund OCFs, transaction and incidental fees, please visit: <https://eqinvestors.co.uk/advisers/resources/>.

Analysis on FCA COLL underlying fund Assessment of Value

For all funds where appropriate, 1: Charges are justified based on assessment and any action taken or, where the first assessment is not yet due, based on initial product design.

Distribution strategy

What is the distribution strategy?

Our distribution strategy is to clients of UK authorised financial advisers.

Does the distributor have access to all appropriate information from the manufacturer to be able to understand the value that the product is intended to provide for the customer?

Yes, the distributor has access to all the necessary information. Please see the EQ website for more information: <https://eqinvestors.co.uk/advisers/resources/>

Does the distributor understand the following?

1) the intended benefit of the product, 2) value to be provided to customer by the product? 3) characteristics, financial goals and the needs of the target market? 4) the level of pricing set? 5) quality of support required to represent good value, 6) potential impact of distribution arrangements?

Yes, EQ provides adequate documentation, resources, education, and support to the distributor. This includes both within this document and the other resources available supply information on the key features and intended benefits of the product, examples of the objectives, characteristics and needs of the clients as well as a clear outline of the target market.

The document summarises the outcomes of our analysis on the quality of the support through annual client surveys and MI on complaints & retention rates.

Are there any remuneration arrangements with the distributor which may impact the value customers receive?

There are no remuneration arrangements with the distributor which may impact the value clients receive.

Are proposed distribution arrangements consistent with the value of the product?

Our distribution strategy is to clients of UK authorised financial advisers. The distribution arrangements in place with those advisers is consistent with the value of the product.

Conclusion

Does the product in its current form offer fair value?

The product provides fair value based on an analysis of the cost of manufacturing, market rate for the product benchmarked against firms providing similar products as well as profitability, including revenue and profit margins.

Portfolio	Performance	Support	Cost
Positive Impact Defensive Portfolio	3: Satisfactory	2: Good	3: Satisfactory
Positive Impact Cautious Portfolio	3: Satisfactory	2: Good	2: Good
Positive Impact Cautious Plus Portfolio	2: Good	2: Good	2: Good
Positive Impact Balanced Portfolio	2: Good	2: Good	2: Good
Positive Impact Balanced Plus Portfolio	2: Good	2: Good	2: Good
Positive Impact Adventurous Portfolio	2: Good	2: Good	2: Good
Positive Impact Adventurous Plus Portfolio	2: Good	2: Good	2: Good
Positive Impact All Equity Portfolio	2: Good	2: Good	1: Excellent

Explain why the product provides value for the vulnerable customers in the target market.

All clients will come to EQ via an authorised Financial Adviser. Thus, the customers vulnerability should be managed accordingly to ensure that this will not impact the value of the product.

Are there any adverse findings in this assessment?

There are no adverse findings in this assessment.

Set out mitigating actions to occur prior to distribution or remedial action to prevent foreseeable harms to current customers.

Not Applicable.

Is the offering, including the portfolio management solution meeting adviser and customer needs, consistent with good customer outcomes.

Yes, the solution is consistent with good customer outcomes and the product remains consistent with the needs of the identified target market. We have conducted analysis of the financial and non-financial performance of the MPS product and conclude that it is meeting the investment needs and performing as expected.

Legal

EQ Investors Limited, Centennium House, 100 Lower Thames Street, London, EC3R 6DL.
www.eqinvestors.co.uk

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