



# Multi-Asset Funds

Assessment of Value – June 2023

Barclays Asset Management Limited



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# Introduction to the Assessment of Value

In 2017, the Financial Conduct Authority (“FCA”) introduced rules requiring authorised fund managers (“AFMs”), including Barclays Asset Management Limited (“BAML”), to enhance their governance framework and demonstrate how their funds provide value to investors. As part of this, and on an annual basis, all AFMs will now produce an Assessment of Value on the funds they manage and will review how they deliver value across the following criteria:

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

The wide range of criteria allows investors to see how the Funds deliver value, not only in the context of fees and performance, but also through the different services they provide. The multi-asset fund range Assessment of Value will be conducted at least annually and a summary will be made available to investors on our website on, or before, 27 June each calendar year.

The conclusions of the Assessment of Value will also be used to evidence our Price and Value outcomes under the FCA’s Consumer Duty Regulation. As per industry practice, these conclusions will be included in the European MiFID Template v4.1.

As part of this Assessment of Value, we have conducted an extensive review of the multi-asset funds that we manage and summarised our findings in this report. The multi-asset funds covered in the Assessment of Value are as follows:

Risk Profile	Multi-Asset Passive Funds	Multi-Asset Active Funds
1	Barclays Wealth Global Markets 1	Barclays Multi-Asset Defensive Fund
2	Barclays Wealth Global Markets 2	Barclays Multi-Asset Cautious Fund Barclays Multi-Asset Cautious Income Fund
3	Barclays Wealth Global Markets 3	Barclays Multi-Asset Balanced Fund Barclays Multi-Asset Balanced High Income Fund Barclays Multi-Asset Sustainable Fund
4	Barclays Wealth Global Markets 4	Barclays Multi-Asset Growth Fund
5	Barclays Wealth Global Markets 5	Barclays Multi-Asset Adventurous Growth Fund Barclays Charity Fund

## Previous actions taken to enhance value for investors

At Barclays we have consistently challenged ourselves to keep enhancing the Funds, incorporate innovation and improve value and outcomes for investors. Some of the steps we have taken in the recent past are shown below and we believe that any improvements we intend to make following the completion of the Assessment of Value will add further value for investors above and beyond those steps we have previously made. Highlights include:

- In 2018, investors in the A class of the BWIF sub-funds (excluding Barclays Multi-Asset Cautious Income Fund and Barclays Multi-Asset Balanced Income Fund) benefitted from an average reduction of 0.25% in their annual management charge ("AMC") when the share class merged into the B class
- In February 2019, investors holding the Class A Shares in the Barclays Multi-Asset Cautious Income and Barclays Multi-Asset Balanced Income Funds benefitted when the AMC of the Funds was reduced from 1.00% to 0.80%
- In August 2019, we updated the Funds' prospectuses by assigning comparators to each of the Funds to allow investors to better compare their performance
- In February 2020, we improved the investment objectives and policies of the Funds to ensure that they provide clearer, more detailed information as to how each fund is managed and the types of investments it makes in line with FCA guidance
- In September 2020, as part of the previous Assessment of Value, we reduced the registration fee for nine of our Funds which reduced the overall cost to our investors
- In January 2021, we conducted and implemented an extensive Strategic Asset Allocation ("SAA") review across all of our Multi-Asset Funds in order to improve risk-adjusted returns over the long-term.

# Executive Summary and Key Findings

We have looked across the various criteria, whether that is through the savings investors can achieve through economies of scale, or the quality of service we provide, in order to make an assessment on the value of our funds. Overall, we believe that our multi-asset funds provide value for our investors and this report will describe how we believe this has been achieved. As part of our commitment to continue to develop and improve the level and quality of the information we provide, a fund by fund analysis has now been included towards the end of this report. We hope that this will give investors further clarity in how their funds have performed against particular criteria and we will look to continue to develop our reports in future assessments, as appropriate.

## Key changes since previous Assessment of Value

### Multi-Impact Growth Fund name change and policy updates

A review of the Barclays Multi-Impact Growth Fund was undertaken in 2022 in light of the FCA's Dear Chair Letter on Guiding Principles on ESG and Sustainable Funds. Following the review, it was agreed to amend the fund name and to also take the opportunity to clarify the investment policy and investment strategy that the ACD uses to achieve the funds objective. The amendments do not change the way in the which the Fund is currently managed but are intended to provide additional detail for investors to give further insight into how the Fund is managed and investments are chosen. The changes came into effect on 20 February 2023.

### Platform/ Nominee mailings

Following a share register review conducted in our 2022 Assessment of Value, we wrote to the 9 external platforms/nominees and 4 Barclays nominees invested in our legacy A and B share classes, informing them of their eligibility for the cheaper R share class. As a result of these mailings, we have seen all of the Barclays nominees and 5 of the external platforms/nominees convert their holdings into the R share class.

## Enhancements to the Assessment of Value

We have employed the services of a specialist independent consultant, having a strong track record of helping support many firms with their Assessment of Value through their breadth of expertise and years of experience. For this Multi-Asset Assessment of Value, its input has allowed us to:

### 1. Enhance our peer groups for our Comparable Market Rates analysis

We have been able to identify and provide the most comparable market share classes and provide bespoke peer groups for the share classes of each fund based on fundamental characteristics of the BAML funds. This enables us to provide the most accurate review on our funds through like-for-like comparisons to peer groups.

### 2. Provided validation of the value we are offering through our share classes within our Classes of Units analysis

We have obtained an unbiased external validation of the approach we have taken in providing value through our classes of units and how the differential in pricing across distribution channels relate to industry norms.

## Outcome of the Review

- No area of concern identified against the criteria
- Identified an area that requires further monitoring
- Identified an area of concern requiring action

Fund	Criteria						
	Economies of Scale	Quality of Service	AFM Costs	Comparable Market Rates	Comparable Services	Classes of Units	Performance
Barclays Wealth Global Markets 1	●	●	●	●	●	●	●
Barclays Wealth Global Markets 2	●	●	●	●	●	●	●
Barclays Wealth Global Markets 3	●	●	●	●	●	●	●
Barclays Wealth Global Markets 4	●	●	●	●	●	●	●
Barclays Wealth Global Markets 5	●	●	●	●	●	●	●
Multi-Asset Defensive Fund	●	●	●	●	●	●	●
Barclays Multi-Asset Cautious Fund	●	●	●	●	●	●	●
Barclays Multi-Asset Cautious Income Fund	●	●	●	●	●	●	●
Barclays Multi-Asset Balanced Fund	●	●	●	●	●	●	●
Barclays Multi-Asset Balanced Income Fund	●	●	●	●	●	●	●
Barclays Multi-Asset Sustainable Fund	●	●	●	●	●	●	●
Barclays Multi-Asset Growth Fund	●	●	●	●	●	●	●
Barclays Multi-Asset Adventurous Growth Fund	●	●	●	●	●	●	●
Barclays Charity Fund	●	●	●	●	●	●	●

## Key Findings

### Comparable Market Rates

- 13 of the 14 sub-funds, and their individual share classes, are delivering value in the context of charges in comparison to the broader comparable market. The OGC of Multi-Asset Cautious Fund is 0.47% more expensive than the average OGC of its peer group. This is currently under review with our portfolio management team

### Classes of Units

- Third party independent evaluation of our classes of units has shown that the charges for our legacy direct retail classes are at a 0.39% increment above the charges for the IA Primary, in comparison to 0.50% seen across the industry
- We are recommending the reduction of the registration fee of the institutional class of unit (I share Class) for the Multi-Asset Sustainable Fund, from 0.10% to 0.03%, to be in line with the equivalent institutional share class for the Global Markets Funds (Z share class).

### Performance

- 8 of the 14 sub-funds are consistently delivering value through Performance, with 13 of the 14 achieving a positive total return for clients over 5 years
- Broader market conditions have hampered recent performance of the lower risk profiled funds. However, an updated SAA is to be delivered in the coming months which we expect to have a positive impact

### AFM Costs

- We validated the level of charges for each of our Funds and believe that neither the Funds nor the AFM are making excessive profits to the detriment of our investors

### Economies of Scale

- Where economies of scale are achievable and exist, these are passed onto investors

### Comparable Services

- The Funds are delivering value when compared to similar internally managed funds

### Quality of Service

- We have won, and been shortlisted, for a number of awards:
  - Citywire Selector Awards
  - MoneyAge Wealth & Asset Management Awards
  - Investment Week Fund Manager of the Year Nominations

# Economies of Scale

## What does the Economies of Scale section cover?

The purpose of the Economies of Scale section is to assess whether the multi-asset funds achieve savings for investors and provide further value as the AUM of each fund rises. This means that as the size of the Funds grow, a smaller proportion of a unitholder's investment is spent on activities necessary for the smooth running of the Funds, ultimately resulting in cost savings for the investor. In addition, this section also considers how some measures we have put in place for the multi-asset funds protect value for investors if the AUM of a fund is small, ensuring that those investors are not disadvantaged.

## What is the approach we have taken?

When assessing Economies of Scale, we analysed the main costs of the multi-asset funds to see if savings are achieved as AUM increases, and if these are ultimately passed on to investors. The costs of the Funds that were reviewed included:

- **Ongoing Charge Figure ("OGC")** – this is the overall cost an investor pays for investing in a fund. This encompasses the four fees listed below and excludes transaction costs
- **Annual Management Charge ("AMC")** – this is payable to Barclays Asset Management Limited ("BAML") as the authorised fund manager ("AFM"). A portion of the AMC is paid to Barclays Investment Services Limited ("BISL") for investment management services
- **Third Party Investment Manager Fee** – this is the fee payable to our third party sub-investment managers and is paid from the AMC
- **Registration Fee** – this is the fee paid directly to BAML and is primarily used to pay the transfer agency services charged by Northern Trust, the appointed transfer agent
- **Third Party Costs** – these are the costs covering a number of services including Fund Accounting, Custody, Depositary, Legal, and Audit charges.

The Barclays Wealth Global Markets 1 to 5 funds and the Barclays Multi-Asset Sustainable Fund have low AUM and therefore we apply a cap on fees, meaning that the OGC is adjusted to a reduced level for investors. We considered this as part of a review on how we prevent diseconomies of scale (the cost disadvantages that funds incur due to the small scale of their operations).



## How did we do?

For all funds, investors benefit from a reduction in OGC when the AUM of the Funds rise. This is because the costs of certain services that investors pay for are fixed (for example, fund accounting). Therefore, as the AUM of the Funds rise, the proportion of those fixed costs, relative to the amount invested, will reduce.

The AMC and registration fee were also considered in the context of Economies of Scale and whether it would be appropriate to introduce a tiering mechanism, whereby the AMC would marginally reduce as certain levels of AUM were reached for each fund. As the AUM of the multi-asset funds are not sufficiently large, we are not in the position to introduce tiered fees, at this time. However, the concept can be revisited should the Funds reach a significantly greater size.

Some of the services provided to investors are conducted by third parties, such as fund accounting. A selection of those costs are tiered, which means that when the AUM of the Funds reach a certain level, the percentage cost paid for those services will marginally reduce, which investors benefit from. In addition, some third party costs, such as audit costs, are fixed which means that as the AUM of the Funds rise, the proportion of those fixed costs will reduce, which investors also benefit from.

Finally, we cap the total OGC of the Barclays Wealth Global Markets 1 to 5 funds and the operating costs of the Barclays Multi-Asset Sustainable Fund in order to lower the cost for investors, which would otherwise be higher. Investors ultimately benefit from the lower OGC and receive the value of the services provided by the Funds at a lower cost.

Overall, there are instances where investors achieve savings as the AUM of the Funds rise. For example, as assets in the Funds rise to a significant level and fixed costs decrease as a proportion of total assets, the investor will achieve savings in the overall cost they pay. For those funds where AUM is small, we have introduced measures, such as capping, to reduce the level of cost paid by investors, to ensure they receive value for their investment. We found no instances where economies of scale existed but are not passed on to investors. A summary of these findings can also be found in the fund by fund analysis later on in this report.

## What are the steps we have taken to add value for investors?

In H1 2021, third party costs paid by the investor were reviewed and rate cards were finalised, resulting in no changes to the previous rate cards. Throughout the contract negotiations, the fees were benchmarked against the broader market and proved to be reasonable. The board will continue to monitor the Economies of Scale that investors could achieve, as part of its annual Assessment of Value. In addition, the OGC of the Barclays Wealth Global Markets 1 to 5 funds and the operating costs of the Barclays Multi-Asset Sustainable Fund will continue to be capped to keep the cost low for investors, until the funds reach a level of AUM whereby uncapped costs would no longer be detrimental to investors.

# Quality of Service

## What does the Quality of Service section cover?

The purpose of the Quality of Service section is to look across our fund range and demonstrate how the different services add value for our investors. It is important for investors that we scrutinise and challenge ourselves on these services to ensure they continue to be of high quality and deliver value. Through this section, investors can gain insight into the level of service they are receiving, against the cost they are paying.

We performed detailed analysis on the quality of services provided by BAML, Barclays Investment Solutions Limited ("BISL") as Investment Manager, and other third parties who provide their own services to the Funds and investors. The services include those that may impact investors directly, such as our product literature, or those that may impact investors indirectly, such as our investment management process.

## What is the approach we have taken?

In order to assess the quality of each service, we reviewed all relevant quantitative measurements relating to both our internal practices and third party service providers. These include the service standards we have in place with third party service providers, regulatory breaches and complaints data. Where no quantitative data is available for particular services, we have taken a subjective review, which was validated by internal control functions.

## How did we do?

### Multi-Asset Active Funds

Investors in the multi-asset active funds benefit from BISL's investment management processes which deliver a choice of both active and passive management styles. The investment manager employs a team of investment strategists to build an optimised asset allocation for clients, across five risk profile portfolios. The asset allocation offers a well-diversified, long-term strategic exposure to eight asset classes (although some funds invest in fewer asset classes). Each portfolio has a different mix of asset types, designed to meet a range of risk-return preferences – the Strategic Asset Allocation ("SAA"). The asset allocation of each portfolio will then have a 'tactical tilt' overlay, in line with BISL's best thinking, in order to take advantage of shorter-term market movements – the Tactical Asset Allocation ("TAA").

A robust risk management and governance process oversees the output of the strategic and tactical asset allocation and monitors the risk profiles that the multi-asset funds are built around.

The multi-asset active funds mostly invest in other funds managed by BAML or other Barclays entities and associates. Those funds are managed by an experienced team of specialist fund selectors who apply their best thinking in picking and blending together some of the world's leading asset managers across different asset classes and geographies. Following a comprehensive investment due diligence process, incorporating both quantitative and qualitative analysis, the highest scoring managers are then put through a rigorous operational due

diligence process by an independent team to ensure the operational excellence of the underlying managers.

The Barclays Multi-Asset Sustainable Fund uses this same robust due diligence process to select third party funds that look to invest in companies creating meaningful environmental, social and governance impacts. Through the Funds, investors are able to access our manager selection capabilities whilst investing indirectly in companies which are looking to solve a variety of different environmental, social and governance issues.

As signatories to the United Nations Principles for Responsible Investments ("UN PRI"), we have integrated responsible investment considerations into our selection process of individual managers and funds, for which we have been rated 4 star by the UN PRI.

The skills and expertise of our in house fund manager selection team has been recognised in the industry at the following awards:

- Citywire Selector Awards Ian Aylward, Head of Manager Selection & Responsible Investing, was voted the 'Most Influential UK Fund Selector' in 2022 and also listed as one of the Top 10 Heads of Fund Selection in the UK in 2023.
- MoneyAge Wealth & Asset Management Awards 2023 Barclays was shortlisted in the Multi-Asset Manager category. Although unsuccessful in this category, Rob Mansell and Sabina Raza, Fund Managers for the GlobalAccess Emerging Market Equity Fund and Emerging Market Debt Fund, won the Emerging Markets Manager of the Year. The multi-asset active funds invest in to both of these funds.

- Investment Week Fund Manager of the Year The Irish domiciled single-asset class fund, GlobalAccess Global High Yield Bond Fund, was shortlisted for Investment Week's Fund Manager of the Year award in 2022. The multi-asset active funds invest into the fund.

### Multi-Asset Passive Funds – Barclays Wealth Global Markets

For our passive range, the Barclays Wealth Global Markets 1 to 5 funds, we incorporate the same investment process (including active tactical and strategic asset allocation) as the multi-asset active funds, however we do not select the underlying passive funds. Instead, we delegate the role of implementation of our asset allocation to a third party provider given their established global expertise in this field. The provider has a history of delivering strong index tracking returns and the Funds offer competitive pricing to investors through the benefits of economies of scale.

### Other Services Provided

Finally, the multi-asset funds benefit from our robust oversight and governance of all of our third party suppliers. We continuously monitor the service standards we have in place with key suppliers and are proud of the excellent partnerships we have forged to provide a good service to investors.

Overall, both the multi-asset active and passive funds provide a good level of value to investors through a variety of different services, such as our investment process. From an operational standpoint, particularly when services are delegated to a third party, we hold those parties to high standards. A provider that has particularly demonstrated

high levels of service quality is our Fund Administrator, Northern Trust, who have received Gold standard accreditation from Investor in Customers ("IIC") – a leading independent customer experience agency in the UK. IIC measured Northern Trust against four key principles which identify how well they:

- Understand Customer Needs
- Meet Customer Needs
- Delight Customers
- Engender Loyalty

The Gold standard accreditation was received in 2017, 2019 and again in the most recent assessment in 2022. Third party services are monitored continuously. This is to ensure that the Funds deliver value and continue to do so in the future.

### What are the steps we have taken to add value for investors?

In February this year we changed the name of the Barclays Multi-Impact Growth Fund to the Barclays Multi-Asset Sustainable Fund. We also took the opportunity to clarify the investment policy and investment strategy that the ACD uses to achieve the funds objective. The changes are intended to give additional detail for investors to understand how the fund is managed and investments are chosen. We continue to publish an annual impact report for the fund, the latest report for 2023, which is available at [www.barclaysinvestments.com](http://www.barclaysinvestments.com), has evolved to report on a greater number of the ESG themes that are highlighted in the updated investment policy.

The Barclays multi-asset active funds invest in Barclays single-asset class funds. In November 2022, nine of these single-asset class funds adopted Article 8 provisions of SFDR by applying certain exclusionary screens to their investments and seeking to promote environmental and social characteristics to investors.

The UK Stewardship Code sets high standards for those investing money on behalf of UK savers and pensioners, and those that support them, therefore we are pleased to highlight that Barclays Wealth & Investments has met the expected standard of reporting and is now listed as a signatory to the UK Stewardship Code, effective February 2023.

We have recently initiated an outreach to investors to gather up-to-date bank details in order to facilitate a smoother payment process to our investors. This will benefit investors by removing the need to issue payments by cheque, allow us to release any unclaimed client monies and greatly speed up the release of proceeds by having pre-verified bank details on record.

We continue to monitor service standards of third party suppliers and where we have identified instances when service providers were not meeting the standards set out, we have worked with the supplier to resolve the issues.

# General Fund Costs

## What does the General Fund Costs section cover?

The purpose of the General Fund Costs section is to identify the different charges that the Funds pay for, as part of the OGC, and outline whether these are reasonable for the services provided. The types of costs that are reviewed include the AMC and also payments made to other third parties for their services, such as audit and legal fees. For the multi-asset funds (both active and passive), this will include an additional 'underlying' cost which is the cost of investing in other funds. When conducting such analysis on the Funds, we outlined all costs at share class level.

It is appropriate to note that entry costs are waived and no exit costs or performance fees are applied to any of the multi-asset funds.

## What is the approach we have taken?

We compared the charges made to the Funds with the actual costs incurred in providing the services charged for. We then used this information to assess whether the Funds provide good value to investors, in relation to the services they provide, and compared this with the relevant peer groups and similar funds managed by BAML or other Barclays entities and associates. This is covered in more detail in the Comparable Market Rates, Comparable Services, and Classes of Units sections.

We have also assessed AFM costs in the context of profit margins and to consider those that might exist if fund AUMs were to grow significantly. Analysis was undertaken to identify each of the revenue and cost streams that applied to our funds business. These include:

Revenue Streams	Cost Streams
Annual management fees	Transfer agency fees
Registration fees	Risk management fees
Sub-investment manager fees	BISL employee costs
OGC caps*	Barclays UK and Barclays Execution Services costs

## How did we do?

We have a stringent framework in place to monitor and manage the costs of the Funds, with any concerns escalated to the BAML Board. We uphold discipline in how we manage these, particularly in how we allocate cost. For further information on how the costs compare to the Funds' peer groups and similar funds managed by BAML or other Barclays entities and associates, please refer to the Comparable Market Rates, Comparable Services, and Classes of Units sections.

The Board are satisfied that the costs to the Funds are reasonable and the charges for each of the Funds are justified in the context of the overall value delivered to investors.

Furthermore, following the extensive review of the various revenue and cost streams related to the Funds, we have determined, and are comfortable that, the Funds are making reasonable profits at levels that are not considered excessive.

## What are the steps we have taken to add value for investors?

We will continue to monitor all the costs of the Funds and where opportunities arise to reduce them. Our stringent framework and governance structure will remain in place to manage the Funds' costs effectively.

\* This is treated as negative revenue as opposed to costs as it is not shown as a cost in BAML or BISL books

# Comparable Market Rates

## What does the Comparable Market Rates section cover?

The purpose of the Comparable Market Rates section is to compare the value that our Funds provide with other similar funds in the market. This assessment analyses the cost of the Funds compared to our competitors, but also considers the different services that they provide.

## What is the approach we have taken?

In order to achieve a fair and useful comparison, we identified those funds in the market which are comparable to our range. In order to do this, we have employed the services of an independent third party consultant that specialises in data and analytics, who have looked at funds with similar investment objectives, policies and fund sizes. They have also sought to identify the structure of the Funds and share classes so we can provide the most appropriate like-for-like comparison. With all this taken into consideration, they have developed tailored peer groups to reflect the comparable characteristics of these funds and their share classes and, therefore, those funds that most closely resemble our Funds and share classes.

In developing the peer groups, we noted that across the multi-asset active fund market, funds invested large portions of fund assets in passive instruments whilst our Funds do not have a material exposure to passive investments. This can have an impact on the OGC as, in general terms, the higher the exposure to passive investments, the lower the OGC of the fund.

In addition, some of the multi-asset passive funds in the market have less active asset allocation in their portfolios, which are generally charged at a lower level than more actively managed funds. Active asset allocation means that the investment manager continuously seeks to make strategic (long-term) and tactical (short-term) changes to the asset allocation to improve the performance of the funds. Our multi-asset passive funds use a higher degree of active asset allocation and therefore, in some circumstances, charge a higher fee than certain competitors.

Each fund has different share class characteristics according to the distribution channel and therefore fees may be different across share classes for the same fund. The share classes that are comparable with the peer groups are the Class R Shares, Class A and B Shares, and Class I Shares which are the 'retail platform' share class, 'direct holder' share class, and 'institutional' share class, respectively. These classes objectively represent the share classes available for retail distribution, direct retail distribution, and institutional distribution, and allows us to undertake a like-for-like comparison.

## How did we do?

### Multi-Asset Active Funds

When making comparison with other multi-asset funds (with similar risk profiles) available in the market, there typically tends to be a lower fund OGC where there is a higher allocation to passive solutions within the portfolio. As our Funds are invested primarily in other active funds, this means that the OGC tends to be higher when compared to solutions with similar risk profiles but where a significant portion of the portfolio is passively implemented. We are therefore comfortable with the level of fees charged for the service investors are receiving.

The Barclays Multi-Asset Cautious portfolio has seen the OGC go up as a result of an increase in the costs of the underlying funds the Fund is invested in. In light of this, through the first half of 2023, we have undertaken our most in-depth analysis of our Funds pricing, which included a detailed assessment of the aforementioned underlying fund costs of the Cautious Fund. This has allowed us to determine cost cutting options that we could implement to increase the value investors receive through a reduced OGC.

### Multi-Asset Passive Funds – Barclays Wealth Global Markets

For our multi-asset passive range, Barclays Wealth Global Markets 1 to 5, we found that the balance between the product fees and the level of service and value investors are receiving, is appropriate while we grow the size of the Funds. Barclays Wealth Global Markets 1 to 5 have an active asset allocation investment process compared to the peer group where the allocation is, in some cases, fixed. For example, 6 tactical asset allocations changes between the period 28 February 2022 and 27 February 2023 in order to actively adjust our portfolio asset allocation and improve the risk-return of the Funds.

Overall, we believe that the Funds deliver value when compared to the market, taking into consideration the fees paid by investors and the associated service they receive through the Funds. Whilst there are instances where the Funds may charge a higher OGC and AMC, we believe this is largely justified primarily through the higher level of active investment decision making, portfolio construction, and implementation, compared to competitors.

## What are the steps we have taken to add value for investors?

The FCA have required Fund Manufacturers to assess Price and Value outcomes across funds made available to retail investors in the UK. In light of this, through the first half of 2023, we have undertaken our most comprehensive assessment of our Funds pricing. As such, we are working through an in depth analysis on the underlying components of costs of the Funds, to determine potential cost cutting options we could implement to increase the value investors receive.

As we work through the analysis we will be paying particular attention to the Barclays Multi-Asset Cautious Fund, and continue to closely monitor the cost of the underlying funds the portfolio is invested in, to drive cost efficiencies, and assess if our pricing structure is appropriate and fair with the current portfolio construction and service provided.

# Comparable Services

## What does the Comparable Services section cover?

The purpose of the Comparable Services section is to compare the value our Funds provide with other similar funds that are managed by BAML or other Barclays entities. This assessment analyses the costs of the Funds compared to other internally managed funds, but also considers the different services that they offer.

Comment is provided in the Classes of Units section with regards to the relative services provided to investors across the classes of units within the UK Multi-Asset range of Funds.

## What is the approach we have taken?

The services that have been compared relate to that received through investment in equivalent multi-asset Barclays managed investment funds. The approach we have taken is to identify which other funds managed by BAML or other Barclays entities and associates, are comparable to the fund ranges in scope of the assessment. In order to do this, we have looked at funds with similar investment objectives, policies, and fund sizes, including funds which are domiciled in Luxembourg.

We have also looked at identifying funds that match the implementation of our asset allocation (use of underlying active or passive funds), portfolio construction and fund structure (whether it is a fund that invests in other funds or a fund of mandates). Having all these elements appropriately considered will provide investors with an accurate assessment of what they are paying for, given the services provided, in comparison with similar funds.

For example, it is more expensive to invest in certain markets such as emerging markets compared to developed markets, which may impact the cost paid by investors in a multi-asset fund. Likewise, as the size of the funds increase, a smaller proportion of an investor's investment will be spent on fund services and the OGC will reduce.

In terms of classes of units, we have looked at the fees at share class level, including the AMC and OGC. Each fund has different share class characteristics according to the distribution channel and therefore fees may be different across funds. The share classes that are comparable across distribution channels and jurisdictions are the Class R Shares, which is the 'retail platform' share class, and the Class A and B Shares, which are the 'direct' share classes. These classes objectively represent the share classes available for retail/direct distribution and allows us to undertake a like-for-like comparison.

## How did we do?

### Multi-Asset Active Funds

For our multi-asset active funds, we have compared the costs and services with similar funds domiciled in Luxembourg and found that there are some differences in third party costs. For example, there is a 0.05% tax on funds domiciled in Luxembourg that UK funds do not pay. Furthermore, the difference in fund size has meant that the OGC is marginally different between the ranges. In addition, because the multi-asset active funds invest in different underlying active funds, the cost of investing in those funds may be different. Overall, the OGCs of the UK domiciled multi-asset active funds are lower than the equivalent Luxembourg funds.

Finally, the Barclays Multi-Asset Cautious Income and Barclays Multi-Asset Balanced Income funds tend to offer a lower AMC than an equivalent risk profile fund with no income component. This is in line with the market which typically offers multi-asset active income funds at a lower AMC, given the lower expected return of the Funds.

We believe that the OGC and AMC are appropriately aligned across different comparable funds with more detail provided in the fund by fund analysis later on in the report.

### Multi-Asset Passive Funds – Barclays Wealth Global Markets

For our passive range, Barclays Wealth Global Markets 1 to 5, there is no difference in terms of costs between investing in any fund within the range and a similar fund domiciled in Luxembourg. Both fund ranges are paying the same costs for the services provided and have a similar fee structure. All of the funds have a capped OGC which means the manager pays any costs above this level. This results in the Funds' OGC remaining fixed regardless of AUM. More detail can be found in the fund by fund analysis later on in the report.

Overall, we are comfortable that the difference in charges are either immaterial or aligned to the services that each fund provides.

## What are the steps we have taken to add value for investors?

We will continue to monitor the overall costs derived from the services provided to investors, compared to similar funds as part of the annual Assessment of Value. In particular, we will continue to monitor the cost of the underlying funds for the multi-asset active funds to ensure that they are reasonable and fair to investors for the services provided. Finally, we will monitor the AUM of the Funds as this has an impact on the OGC.



## Additional Comparable Service Review: Platform comparison

In addition to the comparable service from a sub-fund perspective, we have undertaken an extensive analysis into the differences in the services offered to investors through the two key channels that the Funds are distributed across, specifically:

1. Direct distribution via the Transfer Agent (TA), Northern Trust and;
2. Digital distribution via Smart Investor – a Barclays UK investment platform

The purpose of the analysis was to understand whether our direct investors in the more expensive legacy share classes would be better off holding their investments on the Smart Investor platform in the cheaper retail share class. To do this, we have compared the platform and dealing fees across both distribution channels.

### Platform Fee

There are no platform fees for investors in our Direct/ BIA book, whereas Smart Investor clients are charged 0.20% of their total account value (with a minimum charge of £48) per annum. On average, the OGC of the retail share class is 0.39% lower than that of the direct legacy share class.

With the £48 minimum platform fee for Smart Investor clients, we determined that Direct/ BIA investors would need a minimum AUM of £12,308 to benefit from transferring their holdings to the Smart Investor platform. Investors below the £12,308 threshold would be paying more than 0.39% (the average increment in OGC between the R and A/B share class) for the platform OGC, thus entirely removing the benefit of a cheaper retail share class.

Having reviewed the direct share register for the Funds, we can see that 53% of the Direct/ BIA share class holders do not meet the minimum threshold and, hence, would be better off paying the more expensive OGC of the legacy share class with no platform fee compared to the cheaper retail OGC and minimum platform fee.

### Dealing Fees

For clients directly invested via the TA, there are no dealing fees payable for all types of trades, compared to Smart Investor where telephone, online, and regular investment trades cost £25, £3, and £1, respectively. Furthermore, email, post, and fax trade instructions are not available to Smart Investor customers as they are to investors in the Direct/ BIA book.

The majority of the Direct/ BIA trades in the period were via regular investments set up with the TA, at 86% of the total trade volume. A much smaller proportion of the trades were via telephone, at c.9% of the total trade volume. However, the relative proportion of clients trading via post in the period stood considerably larger at 40% of the total number of trading clients. This shows us that a move to Smart Investor for a large number of the Direct/ BIA clients would likely not be appropriate given the appetite for postal trading which is not available on the Smart Investor platform.

A further 19% of the clients trading in the period traded via telephone. As telephone trades are not chargeable via the TA, Direct/ BIA clients are saving an average of £30, equating to 0.20% given the average AUM across the client book.

## Direct/ BIA vs. Smart Investor – Outcome of review:

From the in-depth analysis of the holding and trading costs of both the direct TA service and Smart Investor platform, alongside client demographics and trading behaviours, we are confident that a large proportion of the Direct/ BIA client book would not benefit from transferring their holdings to the Smart Investor platform, and the investor services provided through the TA are appropriate and reasonable. A very small cohort of clients may benefit from being invested via Smart Investor. We have discussed the work undertaken to address this in the Classes of Units section.

For more information on Smart Investor please visit: [barclays.co.uk/smart-investor/](https://barclays.co.uk/smart-investor/)

# Classes of Units

## What does the Classes of Units section cover?

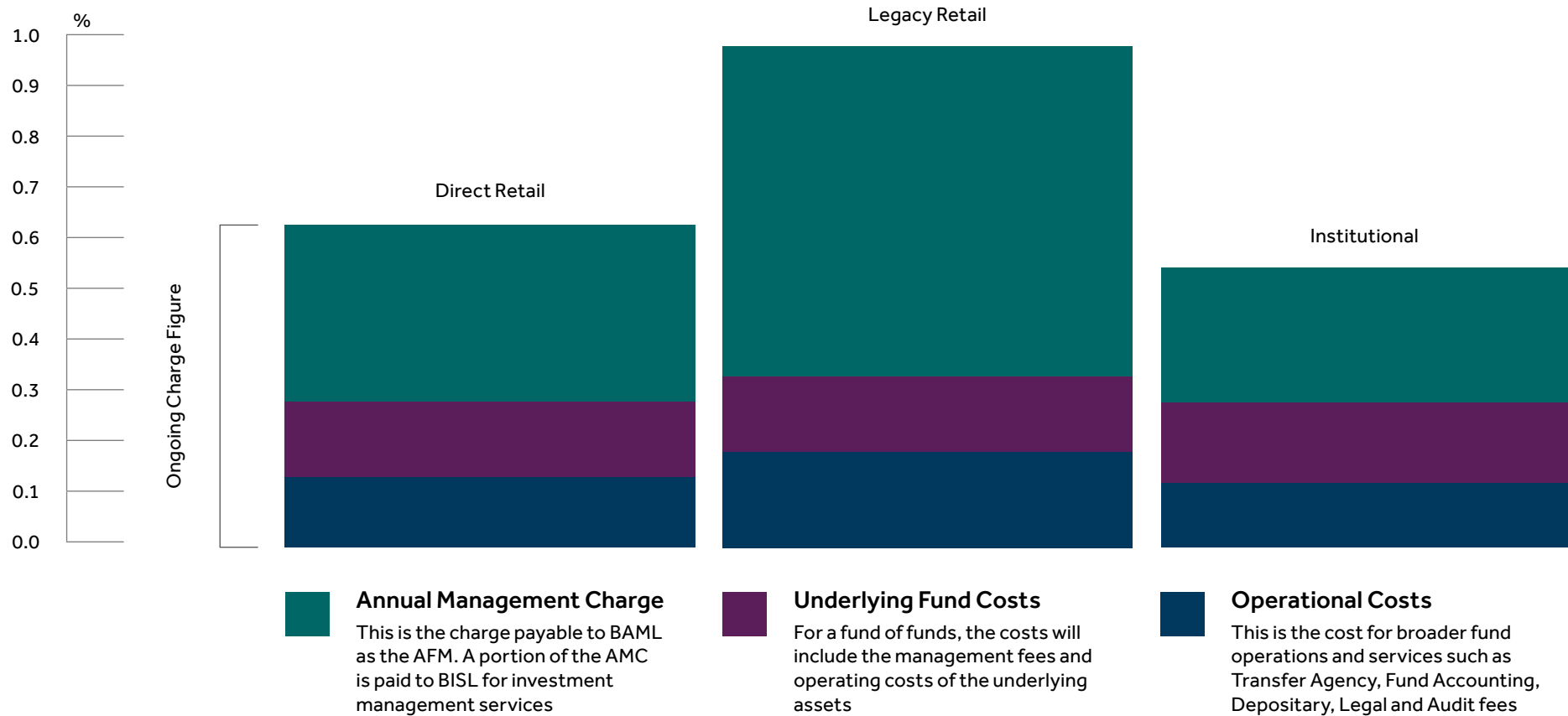
The purpose of the Classes of Units section is to compare the value provided by each share class of each multi-asset fund to ensure they are appropriately priced and are consistent across the Funds. The pricing points of these share classes are based on their characteristics and distribution channel and therefore it is important that investors are in the correct share class to ensure they are paying the appropriate cost.

Share Class	Who is it for?	Explanation of Charges
Direct Retail		
A	These are the share classes for investments made by direct retail investors through our historic branch based channels, and owned by Barclays Investment Account – an ISA wrapped direct to retail proposition sold through legacy branch sales force.	Direct retail share classes have higher Annual Management Charges as the AFM is responsible for the servicing and maintenance of those direct individual investors. Given this, the increment in the Annual Management Charge above the platform / nominee share class reflects the implicit platform functionality the investor has access to through holding the A and B class of unit. Additionally, holders of these classes receive commensurate value creation via share class features not available to the platform R share class.
B		
Platform and Nominee Share Class		
R	This is the main share class for retail investors available through direct to consumer intermediating investment platforms.	This share class was launched post-Retail Distribution Review as a clean class of unit for new client investments. The lower pricing of the class of units is reflective of the restricted access to Platform and other Investment Propositions investing on behalf of individual investors.  Investors total charge for the R share class is the ongoing fund cost plus the respective platform/ proposition fee.
Institutional Share Classes		
Z	These are the share classes launched for two specific institutional investors.	The lower pricing of these share classes is reflective of a significantly higher minimum investment required to hold these classes of unit.
I		

## Fund costs explained

The chart below shows the components that comprise the Ongoing Charge Figure for Barclays Multi-Asset Funds.

For illustrative purposes, we have used the Barclays Wealth Global Markets 3 fund to highlight the breakdown of these costs. Please note that the five Barclays Wealth Global Markets funds have caps implemented to subsidise the fund costs in order to keep the OCF for investors low. The capped OCFs for Barclays Wealth Global Markets 3 are 0.45%, 0.75%, and 0.35% for Direct Retail, Legacy Retail and Institutional share classes, respectively.



## What is the approach we have taken?

The approach we have taken has been to assess the relative pricing of both the AMC and registration fee charged by the Funds across each class of shares to ensure:

- The pricing points of the AMC and registration fee for different shares classes of a fund, according to the characteristics and distribution channel, are justified, reasonable and consistently applied; and
- The pricing differential of the AMC and registration fee applied across funds of the same shares classes are appropriate and consistently applied

We have also worked with a specialist independent consultant, who have provided us with an independent assessment to our Classes of Units approach, as well as help us understand our position in the market in the context of our treatment of legacy share classes.

## How did we do?

In our review, we have considered there may be legitimate reasons for differentiation between the pricing points of classes of shares. There are four scenarios where an investor might be in a more expensive share class:

1. Investors are in a pre-retail distribution review ("RDR") share class which is more expensive because they continue to pay trail commission
2. Investors are in a pre-RDR share class which is more expensive but the manager has 'turned off' trail commission
3. Investors are in a more expensive share class than others available through alternative distribution channels
4. The fund manager has launched a cheaper share class (but not for the reasons listed above) which would be available without switching distribution channel

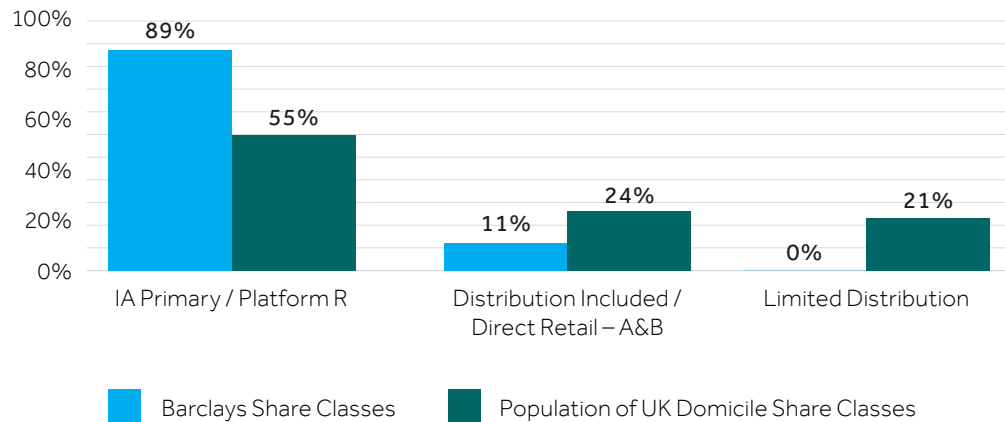
The FCA suggests it is primarily scenarios 2 and 4 that would need addressing through the AFM's assessment of the share classes. Given the scrutiny of these scenarios, we have provided a summary of how they apply to our funds below:

- The differentiation between the Class A and Class B Shares was historic and the only difference that remained was the Class A Shares had a higher AMC. In 2018, we converted all holders of Class A Shareholders within the Barclays Wealth Investment Fund ("BWIF") umbrella to hold the B Shares
- Through our assessment of the share register last year, we identified a small percentage of total holdings across our funds, 0.43%, in platforms that are invested in the A and B share class, each of which are eligible for the platform R class of unit. We have reached out to all these platforms and have seen conversion requests in the majority of them, which we expect will continue as we work with the platforms who still have holdings in the legacy share classes to encourage conversion to the R class of unit
- There are no classes of units where there is little differentiation between a more expensive and a cheaper unit or, the differentiation is historic and no longer applies.

## Comparison to the Investment Association Funds Universe

Based on data provided by our specialist independent consultant, we can also observe the split of total AUM of the funds between legacy retail and platform retail is favourable when compared to the 2022 population of UK domiciled share classes composition as shown by the data below using industry's comparable share class labelling.

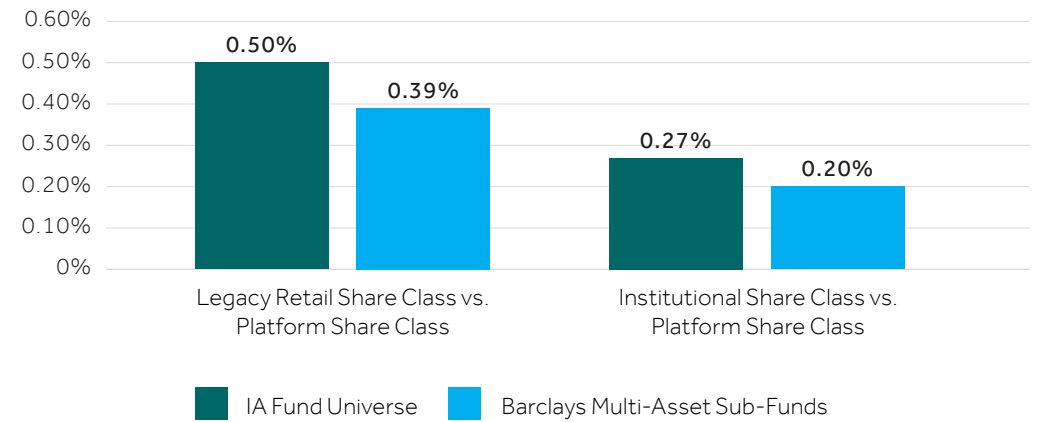
### AUM Breakdown by Share Class



Additionally, through the independent consulting process, we have identified the average increment in cost between all IA Funds legacy retail share class and platform share class is 0.50%. The average increment in cost between the Barclays multi-asset legacy retail classes of units and the platform classes of units is 0.39%.

Similarly, the average difference in the average increment between the institutional share class and platform share class of all IA Funds is 0.27%. The average increment in cost between the Barclays multi-asset platform class of units and the institutional class of unit is 0.20%.

### Average Difference in Share Class Costs



Both data points provide confirmation that the increments charged for both the platform class of unit over and above the retail class of unit are reasonable when compared to the peer group. Overall, the Funds deliver value when comparing class of unit fees for the same fund and across different funds.

## What are the steps we have taken to add value for investors?

We are currently taking steps to ensure investors holding Class A and B shares are not disadvantaged and the share classes they hold deliver value.

As mentioned above, we are working with those platforms invested in A and B share classes to inform them that they are able to convert their underlying investors into the R share class which is available for their platform.

- Currently, investors in the A and B share class make up 11% of the holdings across all funds, which is favourable compared to the population of UK Domiciled Share Classes that have 24% invested in comparable share classes.
- Specific to the FCA's scenario 3 mentioned above, we have undertaken analysis on the composition of our direct book of investors, who hold ~97% of the A and B classes of unit, to ascertain which investors could benefit from moving to a cheaper share class. A comparison has been made to the R class of unit and the comparative value to those investors holding the class through the Barclays digital retail platform, Smart Investor. This required a diligent cost/benefit analysis, given the value the client receives through the A and B share classes from services through the Transfer Agent, Northern Trust. This is evidenced in the Quality of Service section in relation to customer service, and through, amongst others, the following factors:
  - Unlimited ability to trade
  - No trading costs
  - No minimum fee on costs
  - Lower minimum investment

From our analysis, we can see from an explicit overall fee perspective that over half of the direct share class holders do not meet the minimum level of holdings to benefit from a switch to Smart Investor. Below this minimum level, investors would be better off remaining in the more expensive legacy share class. Investors would be required to pay a minimum platform fee on Smart Investor, which alongside the cheaper R share class fee, would be more expensive than remaining in their current class of unit.

After careful consideration of those remaining direct holders who meet the minimum level of holdings, we are currently in the process of developing an email marketing campaign to inform investors of the availability of the R share class through alternative propositions, such as Smart Investor.

- As part of this year's review we are recommending to reduce the registration fee for the Multi-Asset Sustainable Fund institutional I share class in line with Global Markets institutional Z share class. This will ensure pricing points across comparable units for different funds are consistent.

These steps will ensure that investors are in the correct share class for their distribution channel and the differential between pricing points across the share classes and funds are justified, reasonable and consistently applied.

Using independent validation in relation to the our Classes of Units assessment of value, we have acted to reinforce our approach and are positively assured on subsequent steps being undertaken.

We will continue to monitor the share classes as part of the annual Assessment of Value, and ensure that any new share classes are appropriately priced and consistent.

# Performance

## What does the Performance section cover?

The purpose of the Performance section is to assess how each fund delivers performance against its stated investment objective and therefore delivers value to the investor.

## Summary of our investment process

All our multi-asset funds provide investors with access to our asset allocation framework which creates multi-asset, globally diversified portfolios across five different risk profiles ("RP"s 1 to 5). Each RP offers a different potential return for a commensurate increase in risk along a continuum from low to high.

Each RP fund invests in a particular proportion of higher and lower risk assets in order to achieve the appropriate balance of risk and potential return. For example, RP1 holds a greater proportion of lower risk assets, such as cash and government bonds, than higher risk assets, such as developed and emerging market equities. The reverse is the case for RP5, the most risky of the 5 risk profiles.

Each RP is designed to align to an investor's risk and return preference, which means that each fund will perform differently in varying market conditions. The riskier funds will capture higher potential market returns but more of the market's volatility while the less risky funds will capture less of the market's volatility thereby decreasing the chance of loss but also of potential returns.

## What is the approach we have taken?

We assessed whether the multi-asset funds had met their relevant investment objectives across a number of time frames. We also looked at whether the funds had performed as we would expect on an absolute basis and also in relation to each other, to ensure the funds had performed as expected across the risk/return continuum.

The funds are not managed in line with or constrained to any specific benchmarks or indices, however we considered value based on a qualitative assessment and quantitative internal scoring framework that incorporates a variety of different factors. The framework takes into consideration our own strategic asset allocation and the performance of the broader market as expressed by the funds' comparators, as set out in their respective prospectuses.

The quantitative assessment also provides analysis on both returns and risk-adjusted returns (Sharpe Ratio) which were considered over multiple time horizons. Finally, the assessment also took into account the steps already taken to improve investor outcomes and how we expect these to enhance investor value in the future.

## How did we do?

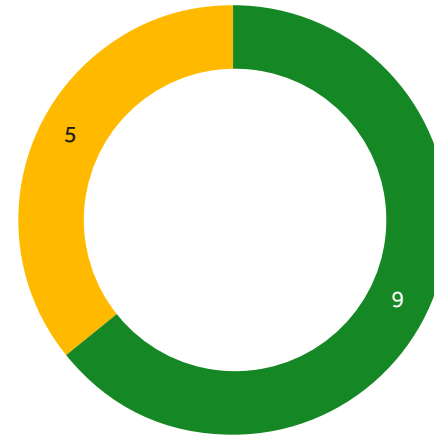
The analysis established that most funds achieved their investment objective. All the funds successfully delivered income across the range of Risk Profiles, but two RP1 funds (Barclays Wealth Global Markets 1 and Barclays Multi-Asset Defensive Fund) have not provided capital growth over the 5 year time frame.

The quantitative assessment, in which we compared the funds' returns against the comparator group and strategic asset allocation, showed that the majority of funds were in line with how we would expect them to perform in prevailing market conditions, given the funds' asset allocation.

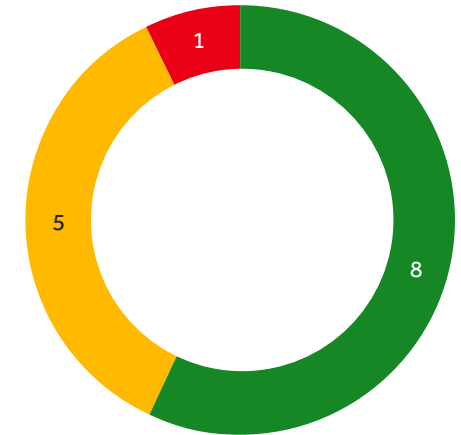
Those funds with lower risk profiles (Barclays Wealth Global Markets 1 and 2, Barclays Multi-Asset Defensive and Barclays Multi-Asset Cautious), which hold a large amount of cash and fixed income assets when compared to their comparators, delivered lower returns in comparison. Broad market weakness within the bond market over the last 12 months has significantly affected the lower risk profiles, and low fixed interest returns have undermined the more cautious allocation. Similarly some of the funds in our range (Barclays Multi-Asset Cautious Income, Barclays Multi-Asset Balanced Income) which have an income bias, also saw performance negatively impacted when compared against their respective comparators. However, these funds achieved higher yields than majority of their comparators which is a component of the investment objectives.

The analysis also set out that the structural changes introduced in recent years has improved investor outcomes and value. For example, the change in the funds' foreign exchange hedging policy has been value accretive to each fund and any cost reduction we have implemented, in the past or as result of this assessment, has led to net performance gains for investors. In addition, the SAA of all funds is being updated in 2023, which we believe will continue to help improve performance over the long-term. Therefore, taking these different aspects into consideration, we believe that the funds have delivered value to investors, in terms of their performance. Please see next page for fund performance details.

1 year to February 2022



1 year to February 2023



- **Green:** No area of concern identified against the criteria
- **Amber:** Identified an area that requires further monitoring
- **Red:** Identified an area of concern requiring action



**Table 1: Yield and Annualised  
cumulative total return performance  
to 28 February 2023 (%)**

<b>Fund</b>	<b>Yield</b>	<b>1 Year (%)</b>	<b>3 Year (%)</b>	<b>5 Year (%)</b>
Barclays Wealth Global Markets 1 B Acc GBP	2.06	-7.15	-1.09	-0.07
Barclays Wealth Global Markets 1 B Dis GBP	2.09	-7.1	-1.06	-0.05
Barclays Wealth Global Markets 1 R Acc GBP	2.06	-6.79	-0.78	0.25
Barclays Wealth Global Markets 1 R Dis GBP	2.08	-6.76	-0.78	0.25
Barclays Wealth Global Markets 1 Z Acc GBP	2.04	-6.78	-	-
Barclays Wealth Global Markets 2 B Acc GBP	1.96	-5.81	0.91	1.59
Barclays Wealth Global Markets 2 B Dis GBP	1.99	-5.81	0.92	1.59
Barclays Wealth Global Markets 2 R Acc GBP	1.96	-5.57	1.16	1.83
Barclays Wealth Global Markets 2 R Dis GBP	1.98	-5.55	1.18	1.84
Barclays Wealth Global Markets 2 Z Acc GBP	1.96	-5.5	-	-
Barclays Wealth Global Markets 3 B Acc GBP	1.95	-3.35	3.62	3.38
Barclays Wealth Global Markets 3 B Dis GBP	1.98	-3.36	3.63	3.38
Barclays Wealth Global Markets 3 R Acc GBP	1.95	-3.15	3.88	3.63
Barclays Wealth Global Markets 3 R Dis GBP	1.98	-3.11	3.89	3.63
Barclays Wealth Global Markets 3 Z Acc GBP	1.13	-3.31	-	-
Barclays Wealth Global Markets 4 B Acc GBP	1.45	-0.98	6.14	4.93
Barclays Wealth Global Markets 4 R Acc GBP	1.69	-0.74	6.4	5.18
Barclays Wealth Global Markets 5 B Acc GBP	1.18	0	7.78	5.93
Barclays Wealth Global Markets 5 R Acc GBP	1.43	0.23	8.06	6.21
Barclays Wealth Global Markets 5 Z Acc GBP	1.52	0.37	-	-
Barclays Multi-Asset Defensive B Acc GBP	2.98	-5.98	-1.55	-0.71
Barclays Multi-Asset Defensive B Inc GBP	3.04	-6	-1.54	-0.71
Barclays Multi-Asset Defensive R Acc GBP	2.97	-5.7	-1.21	-0.36
Barclays Multi-Asset Defensive R Inc GBP	3.03	-5.68	-1.2	-0.36
Barclays Multi-Asset Cautious B Acc GBP	1.49	-1.29	2.59	1.28




**Table 1: Yield and Annualised cumulative total return performance to 28 February 2023 (%)**  
(cont.)

Barclays Multi-Asset Cautious B Inc GBP	1.5	-1.23	2.6	1.31
Barclays Multi-Asset Cautious R Acc GBP	1.54	-0.82	3.04	1.74
Barclays Multi-Asset Cautious R Inc GBP	1.56	-0.81	3.06	1.78
Barclays Multi-Asset Balanced B Acc GBP	1.58	0.44	4.79	2.8
Barclays Multi-Asset Balanced B Inc GBP	1.6	0.37	4.78	2.83
Barclays Multi-Asset Balanced R Acc GBP	1.59	1.02	5.37	3.37
Barclays Multi-Asset Balanced R Inc GBP	1.61	1.05	5.37	3.4
Barclays Multi-Asset Growth B Acc GBP	0.23	2.11	6.58	3.83
Barclays Multi-Asset Growth B Inc GBP	0.23	2.1	6.58	3.86
Barclays Multi-Asset Growth R Acc GBP	0.77	2.64	7.18	4.41
Barclays Multi-Asset Growth R Inc GBP	0.77	2.65	7.17	4.43
Barclays Multi-Asset Advnturs Growth B Acc GBP	0.11	1.77	6.62	3.76
Barclays Multi-Asset Advnturs Growth B Inc GBP	0.11	1.71	6.59	
Barclays Multi-Asset Advnturs Growth R Acc GBP	0.65	2.31	7.18	4.31
Barclays Multi-Asset Advnturs Growth R Inc GBP	0.65	2.34	7.21	4.33
Barclays Multi-Asset Cautious Income A Acc GBP	3.45	-4.73	-0.42	-0.15
Barclays Multi-Asset Cautious Income A Dis GBP	3.52	-4.71	-0.42	-0.16
Barclays Multi-Asset Cautious Income R Acc GBP	3.44	-4.41	-0.09	0.2
Barclays Multi-Asset Cautious Income R Dis GBP	3.51	-4.39	-0.07	0.22
Barclays Multi-Asset Balanced Income A Dis GBP	3.2	-2.46	1.47	0.79
Barclays Multi-Asset Balanced Income B Dis GBP	3.2	-2.45	1.49	0.85
Barclays Multi-Asset Balanced Income R Dis GBP	3.19	-2.22	1.75	1.11
Barclays Multi-Asset Sustainable I Dis GBP	0.06	-3.86	4.24	4.41
Barclays Multi-Asset Sustainable R Acc GBP	0.06	-3.88	4.25	4.41
Barclays Charity R Acc GBP	2.97	-0.24	5.05	4.64
Barclays Charity R Inc GBP	3.03	-0.24	5.04	4.64

Source: Morningstar as of 28 February 2023

# Fund by Fund Analysis

In this section, we have taken a more detailed look at how each of our funds deliver value across the seven different criteria and provide a judgement on whether any areas of concern have been identified and whether further monitoring or action is required. In order to do that, we have included a traffic light framework of green, amber, and red to allow investors to analyse each of the funds they may invest in to determine whether the Funds have delivered sufficient value against each of the seven criteria. The traffic light system should be interpreted as follows:

-  Green: No area of concern identified against the criteria
-  Amber: Identified an area that requires further monitoring
-  Red: Identified an area of concern requiring action






As part of the traffic light framework and fund by fund analysis, two of the criteria were analysed at AFM level (Economies of Scale, Quality of Service) whereas five of the criteria were analysed at fund/ share class level. This is because criteria, such as Economies of Scale and Quality of Service, are applicable to all of our funds in equal measure and therefore it is more appropriate to conduct such analysis using a top down approach. In respect to the performance section, both a qualitative and quantitative assessment are taken into consideration when assigning a red, amber or green rating with the qualitative element focussing on whether or not the Fund has achieved its investment objective.





Each fund page will include the investment objective of the Fund, commentary for each criteria (together with a green, amber or red rating), alongside a final overall summary, which should guide investors on our determination of value for each fund. The criteria commentaries will provide an outline of why a fund has achieved a particular rating and what next steps we propose, if any.

Fund	Page #
Barclays Wealth Global Markets 1	28
Barclays Wealth Global Markets 2	30
Barclays Wealth Global Markets 3	32
Barclays Wealth Global Markets 4	34
Barclays Wealth Global Markets 5	36
Barclays Multi-Asset Defensive Fund	38
Barclays Multi-Asset Cautious Fund	40
Barclays Multi-Asset Balanced Fund	42
Barclays Multi-Asset Growth Fund	44
Barclays Multi-Asset Adventurous Growth Fund	46
Barclays Multi-Asset Cautious Income Fund	48
Barclays Multi-Asset Balanced Income Fund	50
Barclays Multi-Asset Sustainable Fund	52
Barclays Charity Fund	54

## Barclays Wealth Global Markets 1






**Investment Objective:** The Fund seeks to provide capital growth and income over the long term (a period of at least 5 years).





Criteria	Summary	Rating
Performance	The Fund achieved part of its objective by providing an ongoing stream of income, but struggled to meet the capital growth requirement of its investment objective, though it is maintaining a positive level of return over its track record. The Fund lagged its SAA and comparator over 1, 3 and 5 years. The Fund is a risk profile 1 and is positioned slightly more conservatively than other funds competing in this space. Broad market weakness over the past 12 months has resulted in challenges within both equity and fixed income markets, which has had a larger impact on more cautious allocations. Various remedial action has taken place over the past several years to improve performance (see "Introduction to the Assessment of Value" for further details). An update to the Fund's SAA in 2023 will help it to deliver on its long-term investment objectives. We are satisfied that the Fund offers value, but we will continue to monitor performance in future assessments.	
Economies of Scale	Where economies of scale are possible, the full benefits are passed onto investors. This is because when the AUM of the Fund grows, the OGC will reduce due to the fixed costs e.g. legal fees. In addition, with certain third party providers we operate on a tiered fee structure which means as the AUM increases, the marginal cost of those services decreases. However, where charges are made on a percentage basis, it is not possible to achieve economies of scale. Finally, the OGC of all shares classes are capped at a fixed percentage, which prevents any diseconomies of scale and adds further value to the investor. We found no instances where economies of scale existed but are not passed on to investors.	
Quality of Service	Our analysis has found that the Fund is delivering a good quality of service to investors. As part of the investment management process, we have committed significant resources into developing long term asset allocations for the different portfolios with each designed to achieve the optimal balance of risk and reward for our investors. The Fund benefits from robust risk management, oversight and governance processes to ensure that the Fund continues to comply with regulations and meet the needs of our investors. Therefore, the Fund has been rated green and we are satisfied that the Fund continues to deliver value.	
General Fund Costs	<p>We have a stringent framework in place to monitor and manage the costs of the Funds, with any concerns escalated to the BAML Board. We uphold discipline in how we manage these, particularly in how we allocate cost, where BISL/ BAML will pay for certain costs that should not be borne by the investor. We are satisfied that the costs to the Funds are reasonable and the charges for each of the Funds are justified in the context of the overall value delivered to investors.</p> <p>An extensive review of the various revenue and cost streams related to the Funds has been undertaken. We have determined, and are comfortable that, the Funds are making reasonable profits at levels that are not considered excessive.</p>	
Comparable Services	We have compared the Barclays Wealth Global Markets 1 with the equivalent Barclays GlobalBeta Portfolio 1, domiciled in Luxembourg. Both funds have the same fee structure and as a result, investors are paying the same OGC and AMC, where the OGC is capped (0.45% for the R Shares and 0.75% for the B Shares). Therefore we are comfortable with the level of fees and satisfied that the Fund continues to deliver value.	

Criteria	Summary	Rating
Comparable Market Rates – B Class	The OGC and AMC are below the average of the peer group. Given the Fund’s active management of the asset allocation and the additional value received by owners of this class of unit, which is referenced in the Quality of Service and Classes of Units section, we believe the share class is delivering value for investors. We believe no action is required based on the comparison with other similar products.	
Comparable Market Rates – R Class	The OGC is in line with the average of the peer group and the AMC is slightly below the average of the peer group. Given the Fund’s active management of the asset allocation, we believe the share class is delivering value for investors. We believe no action is required based on the comparison with other similar products.	
Comparable Market Rates – Z Class	The OGC is in line with the average of the peer group and the AMC is slightly below the average of the peer group. Given the Fund’s active management of the asset allocation, we believe the share class is delivering value for investors. We believe no action is required based on the comparison with other similar products.	
Classes of Units	There are three classes of units for Barclays Wealth Global Markets 1. The R class of unit is available through intermediating platforms and propositions. The B class of unit has been historically available to direct investors and the Z class of unit is available for institutional investors. We are comfortable with the 0.35 difference in AMC between B and R classes of unit and the 0.05% difference in registration fee between B and R classes of unit, due to the different distribution channels and service needs typical of the investor type. In addition, we are comfortable with the 0.05% difference in AMC between R and Z classes of unit and the 0.02% difference in registration fee between R and Z class of unit for the same reasons.	
Summary	We have looked across the various criteria of the Fund, whether that is through the performance the Funds have achieved, or how the Fund’s costs compare to its peers, in order to make an assessment on the value delivered to our investors. We believe that the Fund continues to offer good value and, given the extensive action we have taken over the past several years (set out in the “Introduction to the Assessment of Value” section), we believe no action is required at this time and are confident that these changes will continue to have a positive impact on the value of the Fund going forward.	

## Barclays Wealth Global Markets 2






**Investment Objective:** The Fund seeks to provide capital growth and income over the long term (a period of at least 5 years).

Criteria	Summary	Rating
Performance	The Fund is performing in line with its investment objective and expectations, whilst maintaining a positive level of return over its track record. However, the Fund lagged its SAA and comparator over 1, 3 and 5 years. The Fund is a risk profile 2, which sits in the same comparator group as a risk profile 3 fund, such as the Barclays Wealth Global Markets 3. In up markets we usually see a risk profile 2 fund lag behind a risk profile 3 fund and the reverse happens in down markets. Various remedial action has taken place over the past several years to improve performance (see "Introduction to the Assessment of Value" for further details). An update to the Fund's SAA in 2023 will help it continue to deliver on its long-term investment objectives. We are satisfied that the Fund is delivering on its investment objective, but we will continue to monitor performance in future assessments.	
Economies of Scale	Where economies of scale are possible, the full benefits are passed onto investors. This is because when the AUM of the Fund grows, the OGC will reduce due to the fixed costs e.g. legal fees. In addition, with certain third party providers we operate on a tiered fee structure which means as the AUM increases, the marginal cost of those services decreases. However, where charges are made on a percentage basis, it is not possible to achieve economies of scale. Finally, the OGC of all shares classes are capped at a fixed percentage, which prevents any diseconomies of scale and adds further value to the investor. We found no instances where economies of scale existed but are not passed on to investors.	
Quality of Service	Our analysis has found that the Fund is delivering a good quality of service to investors. As part of the investment management process, we have committed significant resources into developing long term asset allocations for the different portfolios with each designed to achieve the optimal balance of risk and reward for our investors. The Fund benefits from robust risk management, oversight and governance processes to ensure that the Fund continues to comply with regulations and meet the needs of our investors.	
General Fund Costs	We have a stringent framework in place to monitor and manage the costs of the Funds, with any concerns escalated to the BAML Board. We uphold discipline in how we manage these, particularly in how we allocate cost, where BISL/ BAML will pay for certain costs that should not be borne by the investor. We are satisfied that the costs to the Funds are reasonable and the charges for each of the Funds are justified in the context of the overall value delivered to investors. We are comfortable that the Fund is making reasonable profits at levels that are not considered excessive.	
Comparable Services	We have compared the Barclays Wealth Global Markets 2 with the equivalent Barclays GlobalBeta Portfolio 2, domiciled in Luxembourg. Both funds have the same fee structure and as a result, investors are paying the same OGC and AMC, where the OGC is capped (0.45% for the R Shares and 0.75% for the B Shares). Therefore we are comfortable with the level of fees and satisfied that the Fund continues to deliver value.	





Criteria	Summary	Rating
Comparable Market Rates – B Class	The OGC and AMC are above the averages of the peer group. Given the lower AUM as compared to the lower cost peers, the active management of the asset allocation and the additional value received by owners of this class of unit, which is referenced in the Quality of Service and Classes of Units section, we believe the share class is delivering value for investors. We believe no action is required based on the comparison with other similar products.	
Comparable Market Rates – R Class	The OGC and AMC are below the averages of the peer group. Given the Fund’s active management of the asset allocation, we believe the share class is delivering value for investors. We believe no action is required based on the comparison with other similar products.	
Comparable Market Rates – Z Class	The OGC and AMC are below the average of the peer group. Given the Fund’s active management of the asset allocation and lower AUM as compared to the peer, we believe the share class is delivering value excellent value for investors. We believe no action is required based on the comparison with other similar products.	
Classes of Units	There are three classes of units for Barclays Wealth Global Markets 2. The R class of unit is available through intermediating platforms and propositions. The B class of unit has been historically available to direct investors and the Z class of unit is available for institutional investors. We are comfortable with the 0.30% difference in AMC and 0.05% difference in registration fee between B and R class of units, due to the different distribution channels and service needs typical of the investor type. In addition, we are comfortable with the 0.10% difference in AMC and 0.02% difference in registration fee between R and Z class of unit for the same reasons.	
Summary	We have looked across the various criteria of the Fund, whether that is through the performance the Funds have achieved, or how the Fund’s costs compare to its peers, in order to make an assessment on the value delivered to our investors. We believe that the Fund continues to offer good value and, given the extensive action we have taken over the past several years (set out in the “Introduction to the Assessment of Value” section), we believe no action is required at this time and are confident that these changes will continue to have a positive impact on the value of the Fund going forward.	

## Barclays Wealth Global Markets 3

**Investment Objective:** The Fund seeks to provide capital growth and income over the long term (a period of at least 5 years).






Criteria	Summary	Rating
Performance	The Fund is performing in line with its investment objective and expectations, whilst maintaining a positive level of return over its track record. The Fund performed well against its comparator over 3 and 5 years but lagged behind its SAA over all time periods. Various remedial action has taken place over the past several years to improve performance (see "Introduction to the Assessment of Value" for further details). An update to the Fund's SAA in 2023 will help it continue to deliver on its long-term investment objectives. We are satisfied that the Fund is continuing to deliver value for the investor and has been given a green rating.	
Economies of Scale	Where economies of scale are possible, the full benefits are passed onto investors. This is because when the AUM of the Fund grows, the OGC will reduce due to the fixed costs e.g. legal fees. In addition, with certain third party providers we operate on a tiered fee structure which means as the AUM increases, the marginal cost of those services decreases. However, where charges are made on a percentage basis, it is not possible to achieve economies of scale. Finally, the OGC of all shares classes are capped at a fixed percentage, which prevents any diseconomies of scale and adds further value to the investor. We found no instances where economies of scale existed but are not passed on to investors.	
Quality of Service	Our analysis has found that the Fund is delivering a good quality of service to investors. As part of the investment management process, we have committed significant resources into developing long terms asset allocations for the different portfolios with each designed to achieve the optimal balance of risk and reward for our investors. The Fund benefits from robust risk management, oversight, and governance processes to ensure that the Fund continues to comply with regulations and meet the needs of our investors.	
General Fund Costs	We have a stringent framework in place to monitor and manage the costs of the Funds, with any concerns escalated to the BAML Board. We uphold discipline in how we manage these, particularly in how we allocate cost, where BISL/ BAML will pay for certain costs that should not be borne by the investor. We are satisfied that the costs to the Funds are reasonable and the charges for each of the Funds are justified in the context of the overall value delivered to investors. We are comfortable that the Fund is making reasonable profits at levels that are not considered excessive.	
Comparable Services	We have compared the Barclays Wealth Global Markets 3 with the equivalent Barclays GlobalBeta Portfolio 3, domiciled in Luxembourg. Both funds have the same fee structure and as a result, investors are paying the same OGC and AMC, where the OGC is capped (0.45% for the R Shares and 0.75% for the B Shares). Therefore we are comfortable with the level of fees and satisfied that the Fund continues to deliver value.	







Criteria	Summary	Rating
Comparable Market Rates – B Class	The OGC and AMC are below the averages of the peer group. Given the Fund’s active management of the asset allocation and the additional value received by owners of this class of unit, which is referenced in the Quality of Service and Classes of Units section, we believe the share class is delivering value for investors. We believe no action is required based on the comparison with other similar products.	
Comparable Market Rates – R Class	The OGC and AMC are below the averages of the peer group. Given the Fund’s active management of the asset allocation, we believe the share class is delivering value for investors. We believe no action is required based on the comparison with other similar products.	
Comparable Market Rates – Z Class	The OGC is in line with the average of the peer group and the AMC is slightly below the average. Given the Fund’s active management of the asset allocation and lower AUM as compared to the lower cost peers, we believe the share class is delivering value for investors. We believe no action is required based on the comparison with other similar products.	
Classes of Units	There are three classes of units for Barclays Wealth Global Markets 3. The R class of unit is available through intermediating platforms and propositions. The B class of unit has been historically available to direct investors and the Z class of unit is available for institutional investors. We are comfortable with the 0.30% difference in AMC and 0.05% difference in registration fee between B and R class of units, due to the different distribution channels and service needs typical of the investor type. In addition, we are comfortable with the 0.10% difference in AMC and 0.02% difference in registration fee between R and Z class of unit for the same reasons.	
Summary	We have looked across the various criteria of the Fund, whether that is through the performance the Funds have achieved, or how the Fund’s costs compare to its peers, in order to make an assessment on the value delivered to our investors. We believe that the Fund continues to offer good value and, given the extensive remedial action we have taken over the past several years (set out in the “Introduction to the Assessment of Value” section), we believe no action is required at this time and we are confident that these changes will continue to have a positive impact on the value of the Fund going forward.	

## Barclays Wealth Global Markets 4






**Investment Objective:** The Fund seeks to provide capital growth and income over the long term (a period of at least 5 years).





Criteria	Summary	Rating
Performance	The Fund is performing in line with its investment objective and expectations, while maintaining a positive level of return over its track record. The Fund performed in line with or above its SAA and comparator over 1, 3 and 5 years. Various remedial action has taken place over the past several years to improve performance (see "Introduction to the Assessment of Value" for further details). An update to the Fund's SAA in 2023 will help it continue to deliver on its long-term investment objectives. We are satisfied that the Fund is continuing to deliver value for the investor and has been given a green rating.	
Economies of Scale	Where economies of scale are possible, the full benefits are passed onto investors. This is because when the AUM of the Fund grows, the OGC will reduce due to the fixed costs e.g. legal fees. In addition, with certain third party providers we operate on a tiered fee structure which means as the AUM increases, the marginal cost of those services decreases. However, where charges are made on a percentage basis, it is not possible to achieve economies of scale. Finally, the OGC of all shares classes are capped at a fixed percentage, which prevents any diseconomies of scale and adds further value to the investor. We found no instances where economies of scale existed but are not passed on to investors.	
Quality of Service	Our analysis has found that the Fund is delivering a good quality of service to investors. As part of the investment management process, we have committed significant resources into developing long terms asset allocations for the different portfolios with each designed to achieve the optimal balance of risk and reward for our investors. The Fund benefits from robust risk management, oversight, and governance processes to ensure that the Fund continues to comply with regulations and meet the needs of our investors.	
General Fund Costs	We have a stringent framework in place to monitor and manage the costs of the Funds, with any concerns escalated to the BAML Board. We uphold discipline in how we manage these, particularly in how we allocate cost, where BISL/ BAML will pay for certain costs that should not be borne by the investor. We are satisfied that the costs to the Funds are reasonable and the charges for each of the Funds are justified in the context of the overall value delivered to investors. We are comfortable that the Fund is making reasonable profits at levels that are not considered excessive.	
Comparable Services	We have compared the Barclays Wealth Global Markets 4 with the equivalent Barclays GlobalBeta Portfolio 4, domiciled in Luxembourg. Both funds have the same fee structure and as a result, investors are paying the same OGC and AMC, where the OGC is capped (0.45% for the R Shares and 0.75% for the B Shares). Therefore we are comfortable with the level of fees and satisfied that the Fund continues to deliver value.	

Criteria	Summary	Rating
Comparable Market Rates – B Class	The OGC is in line with the average of the peer group and the AMC is slightly below the average of the peer group. Given the Fund’s active management of the asset allocation and the additional value received by owners of this class of unit, which is referenced in the Quality of Service and Classes of Units section, we believe the share class is delivering value for investors. We believe no action is required based on the comparison with other similar products.	
Comparable Market Rates – R Class	The OGC is slightly above the average of the peer group, whilst the AMC is slightly below the average of the peer group. Given the Fund’s active management of the asset allocation and lower AUM as compared to the lower cost peers, we believe the share class is delivering value for investors. We believe no action is required based on the comparison with other similar products.	
Comparable Market Rates – Z Class	The OGC and AMC are below the averages of the peer group. Given the Fund’s active management of the asset allocation, we believe the share class is delivering value for investors. We believe no action is required based on the comparison with other similar products.	
Classes of Units	There are three classes of units for Barclays Wealth Global Markets 4. The R class of unit is available through intermediating platforms and propositions. The B class of unit has been historically available to direct investors and the Z class of unit is available for institutional investors. We are comfortable with the 0.30% difference in AMC and 0.05% difference in registration fee between B and R class of units, due to the different distribution channels and service needs typical of the investor type. In addition, we are comfortable with the 0.10% difference in AMC and 0.02% difference in registration fee between R and Z class of unit for the same reasons.	
Summary	We have looked across the various criteria of the Fund, whether that is through the performance the Funds have achieved, or how the Fund’s costs compare to its peers, in order to make an assessment on the value delivered to our investors. We believe that the Fund continues to offer good value and, given the extensive action we have taken over the past several years (set out in the “Introduction to the Assessment of Value” section), we believe no action is required at this time and we are confident that these changes will continue to have a positive impact on the value of the Fund going forward.	

## Barclays Wealth Global Markets 5






**Investment Objective:** The Fund seeks to provide capital growth and income over the long term (a period of at least 5 years).




Criteria	Summary	Rating
Performance	The Fund is performing in line with its investment objective and expectations, while maintaining a positive level of return over its track record. The Fund performed well against its comparator over 1, 3 and 5 years, and has outperformed its SAA over 1 and 3 years. Various remedial action has taken place over the past several years to improve performance (see "Introduction to the Assessment of Value" for further details). An update to the Fund's SAA in 2023 will help it continue to deliver on its long-term investment objectives. We are satisfied that the Fund is continuing to deliver value for the investor and has been given a green rating.	
Economies of Scale	Where economies of scale are possible, the full benefits are passed onto investors. This is because when the AUM of the Fund grows, the OGC will reduce due to the fixed costs e.g. legal fees. In addition, with certain third party providers we operate on a tiered fee structure which means as the AUM increases, the marginal cost of those services decreases. However, where charges are made on a percentage basis, it is not possible to achieve economies of scale. Finally, the OGC of all shares classes are capped at a fixed percentage, which prevents any diseconomies of scale and adds further value to the investor. We found no instances where economies of scale existed but are not passed on to investors.	
Quality of Service	Our analysis has found that the Fund is delivering a good quality of service to investors. As part of the investment management process, we have committed significant resources into developing long terms asset allocations for the different portfolios with each designed to achieve the optimal balance of risk and reward for our investors. The Fund benefits from robust risk management, oversight, and governance processes to ensure that the Fund continues to comply with regulations and meet the needs of our investors.	
General Fund Costs	We have a stringent framework in place to monitor and manage the costs of the Funds, with any concerns escalated to the BAML Board. We uphold discipline in how we manage these, particularly in how we allocate cost, where BISL/ BAML will pay for certain costs that should not be borne by the investor. We are satisfied that the costs to the Funds are reasonable and the charges for each of the Funds are justified in the context of the overall value delivered to investors. We are comfortable that the Fund is making reasonable profits at levels that are not considered excessive.	
Comparable Services	We have compared the Barclays Wealth Global Markets 5 with the equivalent Barclays GlobalBeta Portfolio 5, domiciled in Luxembourg. Both funds have the same fee structure and as a result, investors are paying the same OGC and AMC, where the OGC is capped (0.45% for the R Shares and 0.75% for the B Shares). Therefore we are comfortable with the level of fees and satisfied that the Fund continues to deliver value.	

Criteria	Summary	Rating
Comparable Market Rates – B Class	The OGC and AMC are above the averages of the peer group. Given the active management of the asset allocation, lower AUM as compared to the lower cost peers, and the additional value received by owners of this class of unit, which is referenced in the Quality of Service and Classes of Units section, we believe the share class is delivering value for investors. We believe no action is required based on the comparison with other similar products.	
Comparable Market Rates – R Class	The OGC is slightly above the average of the peer group, whilst the AMC is higher than the peer group average. Given the active management of the asset allocation and lower AUM as compared to the lower cost peers, we believe the share class is delivering value for investors. We believe no action is required based on the comparison with other similar products.	
Comparable Market Rates – Z Class	The OGC and AMC are slightly above the averages of the peer group. Given the active management of the asset allocation and lower AUM as compared to the lower cost peers, we believe the share class is delivering value for investors. We believe no action is required based on the comparison with other similar products.	
Classes of Units	There are three classes of units for Barclays Wealth Global Markets 5. The R class of unit is available through intermediating platforms and propositions. The B class of unit has been historically available to direct investors and the Z class of unit is available for institutional investors. We are comfortable with the 0.30% difference in AMC and 0.05% difference in registration fee between B and R class of units, due to the different distribution channels and service needs typical of the investor type. In addition, we are comfortable with the 0.10% difference in AMC and 0.02% difference in registration fee between R and Z class of unit for the same reasons.	
Summary	We have looked across the various criteria of the Fund, whether that is through the performance the Funds have achieved, or how the Fund's costs compare to its peers, in order to make an assessment on the value delivered to our investors. We believe that the Fund continues to offer good value and, given the extensive action we have taken over the past several years (set out in the "Introduction to the Assessment of Value" section), we believe no action is required at this time and are confident that these changes will continue to have a positive impact on the value of the Fund going forward.	

## Barclays Multi-Asset Defensive Fund






**Investment Objective:** The Fund seeks to provide capital growth and income over the long term (a period of at least 5 years).

Criteria	Summary	Rating
Performance	The Fund achieved part of its objective by providing an ongoing stream of income, but struggled to meet the capital growth requirement of its investment objective. The Fund has an income focus and achieved strong yields over its track record, but lagged its SAA and comparators in terms of growth over 1, 3 and 5 years. Broad market weakness over the past 12 months has resulted in challenges within both equity and fixed income markets, which has had a larger impact on more cautious allocations. Given the Fund is a risk profile 1 and is positioned slightly more conservatively than other funds, these factors have been significant detractors from performance, hence why the Fund has been given a red rating. Various remedial action has taken place over the past several years to improve performance (see "Introduction to the Assessment of Value" for further details). While the Fund did not perform in line with expectations, an update to the Fund's SAA in 2023 is anticipated to bring the Fund back in line with its long-term investment objectives. We are continuing to monitor performance.	
Economies of Scale	Where economies of scale are possible, the full benefits are passed onto investors. This is because when the AUM of the Fund grows, the OGC will reduce due to the fixed costs e.g. legal fees. In addition, with certain third party providers we operate on a tiered fee structure which means as the AUM increases, the marginal cost of those services decreases. However, where charges are made on a percentage basis, it is not possible to achieve economies of scale. We found no instances where economies of scale existed but are not passed on to investors.	
Quality of Service	Our analysis has found that the Fund is delivering a good quality of service to investors. As part of the investment management process, we have committed significant resources into developing long terms asset allocations for the different portfolios with each designed to achieve the optimal balance of risk and reward for our investors. The Fund benefits from robust risk management, oversight, and governance processes to ensure that the Fund continues to comply with regulations and meet the needs of our investors.	
General Fund Costs	We have a stringent framework in place to monitor and manage the costs of the Funds, with any concerns escalated to the BAML Board. We uphold discipline in how we manage these, particularly in how we allocate cost, where BISL/ BAML will pay for certain costs that should not be borne by the investor. We are satisfied that the costs to the Funds are reasonable and the charges for each of the Funds are justified in the context of the overall value delivered to investors. We are comfortable that the Fund is making reasonable profits at levels that are not considered excessive.	
Comparable Services	The Barclays Multi-Asset Defensive Fund has been compared to the Barclays Multi Manager Portfolio 1, domiciled in Luxembourg. Whilst the OGC and AMC for each comparable share class is slightly higher for the Barclays Multi-Asset Defensive Fund (except for the R share class which has a lower OGC due to economies of scale), it invests in a broader range of asset classes and active funds which leads to a higher underlying fund cost and AMC, due to the greater level of analysis undertaken. Therefore we are comfortable with the level of fees and satisfied that the Fund continues to deliver value.	




Criteria	Summary	Rating
Comparable Market Rates – B Class	The OGC and AMC are above that of the identified peer. The OGC being above average of the peer group can be in part attributable to the costs of the underlying funds that the Defensive Fund invests in. This is something we are working with our portfolio managers in assessing our options to drive cost efficiencies. Given the limited peer group, we believe that investors are paying similar costs for similar funds and, therefore, no action is required.	
Comparable Market Rates – R Class	The OGC is slightly above the average of the peer group, whilst the AMC is 0.24% lower than the average AMC of the peer group. We believe that investors are paying similar costs for similar funds and, therefore, no action is required.	
Classes of Units	There are two classes of units within the Barclays Multi-Asset Defensive Fund. The R class of unit is available through intermediating platforms and propositions and the B class of unit has been historically available to direct investors. We are comfortable with the 0.30% difference in AMC and the 0.05% difference in registration fee between B and R classes of units, due to the different distribution channels and service needs typical of the investor type.	
Summary	We have looked across the various criteria of the Fund, whether that is through the savings investors can achieve through economies of scale, or the quality of service we provide, in order to make an assessment on the value delivered to our investors. We believe that the Fund continues to offer value and, given the extensive action we have taken over the past several years (set out in the "Introduction to the Assessment of Value" section), we believe no action is required at this time and are confident that these changes will continue to have a positive impact on the value of the Fund going forward.	

## Barclays Multi-Asset Cautious Fund

**Investment Objective:** The Fund seeks to provide capital growth and income over the long term (a period of at least 5 years).






Criteria	Summary	Rating
Performance	The Fund is performing in line with its investment objective and expectations. The Fund performed well against its comparator over 1 and 3 years but lagged against SAA over 3 and 5 years. The Fund is a risk profile 2, which sits in the same comparator group as a risk profile 3 fund, such as the Barclays Multi-Asset Balanced Fund. In up markets, we usually see a risk profile 2 fund lag behind a risk profile 3 fund and the reverse happens in down markets. Various remedial action has taken place over the past several years to improve performance (see "Introduction to the Assessment of Value" for further details). An update to the Fund's SAA in 2023 will help it continue to deliver on its long-term investment objectives. We are satisfied that the Fund is delivering on its investment objective but we will continue to monitor performance in future assessments.	
Economies of Scale	Where economies of scale are possible, the full benefits are passed onto investors. This is because when the AUM of the Fund grows, the OGC will reduce due to the fixed costs e.g. legal fees. In addition, with certain third party providers we operate on a tiered fee structure which means as the AUM increases, the marginal cost of those services decreases. However, where charges are made on a percentage basis, it is not possible to achieve economies of scale. We found no instances where economies of scale existed but are not passed on to investors.	
Quality of Service	Our analysis has found that the Fund is delivering a good quality of service to investors. As part of the investment management process, we have committed significant resources into developing long terms asset allocations for the different portfolios with each designed to achieve the optimal balance of risk and reward for our investors. The Fund benefits from robust risk management, oversight, and governance processes to ensure that the Fund continues to comply with regulations and meet the needs of our investors.	
General Fund Costs	We have a stringent framework in place to monitor and manage the costs of the Funds, with any concerns escalated to the BAML Board. We uphold discipline in how we manage these, particularly in how we allocate cost, where BISL/ BAML will pay for certain costs that should not be borne by the investor. We are satisfied that the costs to the Funds are reasonable and the charges for each of the Funds are justified in the context of the overall value delivered to investors. We are comfortable that the Fund is making reasonable profits at levels that are not considered excessive.	
Comparable Services	The Barclays Multi-Asset Cautious Fund has been compared to the Barclays Multi Manager Portfolio 2, domiciled in Luxembourg, and the Barclays Multi-Asset Cautious Income Fund, which has the same risk profile and domiciled in the UK. The Barclays Multi-Asset Cautious Fund has a similar OGC and AMC to the Luxembourg equivalent, however the AMC is slightly higher than the Barclays Multi-Asset Cautious Income Fund. This is because multi-asset income funds tend to have a lower AMC than funds without an income component. Therefore, we are comfortable with the level of fees and satisfied that the Fund continues to deliver value.	






Criteria	Summary	Rating
Comparable Market Rates – B Class	The OGC is higher than the average of the peer group, whilst the AMC is lower than the average of the peer group. We have identified the main driver for this as being the cost of the underlying funds the Cautious Fund invests in. In light of this, we have undertaken an in-depth analysis of these underlying costs to determine potential cost cutting options.	
Comparable Market Rates – R Class	We are also developing a number of new distribution opportunities for the active multi-asset Funds, which will help drive inflows into the Cautious Fund, and by extension the underlying funds. The resultant impact will be a reduced OGC, increasing the value investors receive.	
Classes of Units	There are two classes of units within the Barclays Multi-Asset Cautious Fund. The R class of unit is available through intermediating platforms and propositions and the B class of unit has been historically available to direct investors. We are comfortable with the 0.40% difference in AMC and the 0.05% difference in registration fee between B and R class of units, due to the different distribution channels and service needs typical of the investor type.	
Summary	We have looked across the various criteria of the Fund, whether that is through the savings investors can achieve through economies of scale, or the quality of service we provide, in order to make an assessment on the value delivered to our investors. We believe that the Fund continues to offer some value and, given the extensive remedial action we have taken over the past several years (set out in the "Introduction to the Assessment of Value" section), we believe no action is required at this time. Whilst the performance of the Fund has lagged, we are confident that these changes will continue to have a positive impact on the value of the Fund going forward. We are also working with our portfolio managers in assessing our options to drive cost efficiencies to improve value to our investors.	

## Barclays Multi-Asset Balanced Fund






**Investment Objective:** The Fund seeks to provide capital growth and income over the long term (a period of at least 5 years).




Criteria	Summary	Rating
Performance	The Fund is performing in line with its investment objective and expectations. The Fund performed well against its comparator over the assessment period and against its SAA over the last 12 months, while maintaining a positive level of return over its track record. Various remedial action has taken place over the past several years to improve performance (see "Introduction to the Assessment of Value" for further details). An update to the Fund's SAA in 2023 will help it continue to deliver on its long-term investment objectives. We are satisfied that the Fund is continuing to deliver value for the investor and has been given a green rating.	
Economies of Scale	Where economies of scale are possible, the full benefits are passed onto investors. This is because when the AUM of the Fund grows, the OGC will reduce due to the fixed costs e.g. legal fees. In addition, with certain third party providers we operate on a tiered fee structure which means as the AUM increases, the marginal cost of those services decreases. However, where charges are made on a percentage basis, it is not possible to achieve economies of scale. We found no instances where economies of scale existed but are not passed on to investors.	
Quality of Service	Our analysis has found that the Fund is delivering a good quality of service to investors. As part of the investment management process, we have committed significant resources into developing long terms asset allocations for the different portfolios with each designed to achieve the optimal balance of risk and reward for our investors. The Fund benefits from robust risk management, oversight, and governance processes to ensure that the Fund continues to comply with regulations and meet the needs of our investors.	
General Fund Costs	We have a stringent framework in place to monitor and manage the costs of the Funds, with any concerns escalated to the BAML Board. We uphold discipline in how we manage these, particularly in how we allocate cost, where BISL/ BAML will pay for certain costs that should not be borne by the investor. We are satisfied that the costs to the Funds are reasonable and the charges for each of the Funds are justified in the context of the overall value delivered to investors. We are comfortable that the Fund is making reasonable profits at levels that are not considered excessive.	
Comparable Services	The Barclays Multi-Asset Balanced Fund has been compared to the Barclays Multi Manager Portfolio 3, domiciled in Luxembourg, and the Barclays Multi-Asset Balanced Income Fund and Barclays Multi-Asset Sustainable Fund, which have the same risk profile and domiciled in the UK. The Barclays Multi-Asset Balanced Fund has a similar OGC and AMC to the Luxembourg equivalent, however the AMC is higher than the other comparable UK-domiciled funds. This is because multi-asset income funds tend to have a lower AMC than funds without an income component. Therefore, we are comfortable with the level of fees and satisfied that the Fund continues to deliver value.	

Criteria	Summary	Rating
Comparable Market Rates – B Class	The OGC and AMC are both lower than the averages for the peer group. We believe that investors are paying similar costs for similar funds and, therefore, no action is required.	
Comparable Market Rates – R Class	The OGC is slightly higher than the average of the peer group, whilst the AMC is lower than the peer group average. Given the higher passive allocation as well as higher AUMs of the lower cost funds, we believe the Fund is delivering value and no action is required.	
Classes of Units	There are two classes of units within the Barclays Multi-Asset Balanced Fund. The R class of unit is available through intermediating platforms and propositions and the B class of unit has been historically available to direct investors. We are comfortable with the 0.50% difference in AMC and the 0.05% difference in registration fee between B and R class of units, due to the different distribution channels and service needs typical of the investor type.	
Summary	We have looked across the various criteria of the Fund, whether that is through the savings investors can achieve through economies of scale, or the quality of service we provide, in order to make an assessment on the value delivered to our investors. We believe that the Fund continues to offer value and, given the extensive action we have taken over the past several years (set out in the "Introduction to the Assessment of Value" section), we believe no action is required at this time. We are confident that these changes will continue to have a positive impact on the value of the Fund going forward.	

## Barclays Multi-Asset Growth Fund






**Investment Objective:** The Fund seeks to provide capital growth and income over the long term (a period of at least 5 years).




Criteria	Summary	Rating
Performance	The Fund is performing in line with its investment objective and expectations. The Fund performed above or in line with its SAA and above its comparator over all the assessment periods, while maintaining a positive level of return over its track record. Various remedial action has taken place over the past several years to improve performance (see "Introduction to the Assessment of Value" for further details). An update to the Fund's SAA in 2023 will help it continue to deliver on its long-term investment objectives. We are satisfied that the Fund is continuing to deliver value for the investor and has been given a green rating.	
Economies of Scale	Where economies of scale are possible, the full benefits are passed onto investors. This is because when the AUM of the Fund grows, the OGC will reduce due to the fixed costs e.g. legal fees. In addition, with certain third party providers we operate on a tiered fee structure which means as the AUM increases, the marginal cost of those services decreases. However, where charges are made on a percentage basis, it is not possible to achieve economies of scale. We found no instances where economies of scale existed but are not passed on to investors.	
Quality of Service	Our analysis has found that the Fund is delivering a good quality of service to investors. As part of the investment management process, we have committed significant resources into developing long terms asset allocations for the different portfolios with each designed to achieve the optimal balance of risk and reward for our investors. The Fund benefits from robust risk management, oversight, and governance processes to ensure that the Fund continues to comply with regulations and meet the needs of our investors.	
General Fund Costs	We have a stringent framework in place to monitor and manage the costs of the Funds, with any concerns escalated to the BAML Board. We uphold discipline in how we manage these, particularly in how we allocate cost, where BISL/ BAML will pay for certain costs that should not be borne by the investor. We are satisfied that the costs to the Funds are reasonable and the charges for each of the Funds are justified in the context of the overall value delivered to investors. We are comfortable that the Fund is making reasonable profits at levels that are not considered excessive.	
Comparable Services	The Barclays Multi-Asset Growth Fund has been compared to the Barclays Multi Manager Portfolio 4, domiciled in Luxembourg. The Multi-Asset Growth Fund has a lower OGC than its' comparator due to higher levels of AUM. The AMC is in line with, or lower than, the AMC of Barclays Multi-Manager Portfolio 4 across all share classes. Therefore, we are comfortable with the level of fees and satisfied that the Fund continues to deliver value.	

Criteria	Summary	Rating
Comparable Market Rates – B Class	The OGC is slightly higher than the average of the peer group and the AMC is below the average of the peer group. We believe that investors are paying similar costs for similar funds and therefore no action is required.	
Comparable Market Rates – R Class	The OGC and AMC are higher than the averages of the peer group. The Fund invests in active funds and there is no aim to invest significantly in passive solutions from a portfolio construction perspective. This contrasts with Funds of other competitors with higher exposure to passive solutions, resulting in a lower OGC.	
Classes of Units	There are two classes of units within the Barclays Multi-Asset Growth Fund. The R class of unit is available through intermediating platforms and propositions and the B class of unit has been historically available to direct investors. We are comfortable with the 0.50% difference in AMC and the 0.05% difference in registration fee between B and R class of units, due to the different distribution channels and service needs typical of the investor type.	
Summary	We have looked across the various criteria of the Fund, whether that is through the savings investors can achieve through economies of scale, or the quality of service we provide, in order to make an assessment on the value delivered to our investors. We believe that the Fund continues to offer value and, given the extensive action we have taken over the past several years (set out in the "Introduction to the Assessment of Value" section), we believe no action is required at this time. We are confident that these changes will continue to have a positive impact on the value of the Fund going forward.	

## Barclays Multi-Asset Adventurous Growth Fund






**Investment Objective:** The Fund seeks to provide capital growth and income over the long term (a period of at least 5 years).

Criteria	Summary	Rating
Performance	The Fund is performing in line with its investment objective and expectations. The Fund performed well against its comparator over all time periods and against its SAA over the last 12 months, especially during the market volatility, whilst maintaining a positive level of return over its track record. Various remedial action has taken place over the past several years to improve performance (see "Introduction to the Assessment of Value" for further details). An update to the Fund's SAA in 2023 will help it continue to deliver on its long-term investment objectives. We are satisfied that the Fund is continuing to deliver value for the investor and has been given a green rating.	
Economies of Scale	Where economies of scale are possible, the full benefits are passed onto investors. This is because when the AUM of the Fund grows, the OGC will reduce due to the fixed costs e.g. legal fees. In addition, with certain third party providers we operate on a tiered fee structure which means as the AUM increases, the marginal cost of those services decreases. However, where charges are made on a percentage basis, it is not possible to achieve economies of scale. We found no instances where economies of scale existed but are not passed on to investors.	
Quality of Service	Our analysis has found that the Fund is delivering a good quality of service to investors. As part of the investment management process, we have committed significant resources into developing long terms asset allocations for the different portfolios with each designed to achieve the optimal balance of risk and reward for our investors. The Fund benefits from robust risk management, oversight, and governance processes to ensure that the Fund continues to comply with regulations and meet the needs of our investors..	
General Fund Costs	We have a stringent framework in place to monitor and manage the costs of the Funds, with any concerns escalated to the BAML Board. We uphold discipline in how we manage these, particularly in how we allocate cost, where BISL/ BAML will pay for certain costs that should not be borne by the investor. We are satisfied that the costs to the Funds are reasonable and the charges for each of the Funds are justified in the context of the overall value delivered to investors. We are comfortable that the Fund is making reasonable profits at levels that are not considered excessive.	
Comparable Services	The Barclays Multi-Asset Adventurous Growth has been compared to the Barclays Multi Manager Portfolio 5, domiciled in Luxembourg, which has the same risk profile. The Multi-Asset Adventurous Growth Fund has a lower OGC than its comparator, due to higher levels of AUM. The AMC is in line with, or lower than, its comparator across all share classes. Therefore, we are comfortable with the level of fees and satisfied that the Fund continues to deliver value.	




Criteria	Summary	Rating
Comparable Market Rates – B Class	The OGC is 0.04% higher than the average of the peer group and the AMC is lower than the average of the peer group. We believe that investors are paying similar costs for similar funds and, therefore, no action is required.	
Comparable Market Rates – R Class	The OGC is higher than the average of the peer group, whilst the AMC is in line with the peer group. This is reflective of the additional activities we carry out, such as portfolio construction and derivative usage, which are not carried out by other providers. This is also due in part to the lower level of assets that BAML manages which impedes our ability to charge lower fees when compared to other organisations that manage larger sums of assets. In addition, competitor funds tend to have a higher exposure to passive solutions, resulting in a lower OGC.	
Classes of Units	There are two classes of units within the Barclays Multi-Asset Adventurous Growth Fund. The R class of unit is available through intermediating platforms and propositions and the B class of unit has been historically available to direct investors. We are comfortable with the 0.50% difference in AMC and the 0.05% difference in registration fee between B and R class of units, due to the different distribution channels and service needs typical of the investor type.	
Summary	We have looked across the various criteria of the Fund, whether that is through the savings investors can achieve through economies of scale, or the quality of service we provide, in order to make an assessment on the value delivered to our investors. We believe that the Fund continues to offer value and, given the extensive action we have taken over the past several years (set out in the "Introduction to the Assessment of Value" section), we believe no action is required at this time. We are confident that these changes will continue to have a positive impact on the value of the Fund going forward.	

## Barclays Multi-Asset Cautious Income Fund

**Investment Objective:** The Fund seeks to provide capital growth and income over the long term (a period of at least 5 years).






Criteria	Summary	Rating
Performance	The Fund achieved the income component of its investment objective, delivering higher yields than comparators, but struggled to meet the capital growth requirement over 5 years. The Fund is maintaining a positive level of return over its track record and performed in line with its SAA over 1 and 3 years. The Fund lagged over all time horizons against its comparators given the focus on income. The Fund is a risk profile 2, which sits in the same comparator group as a risk profile 3 fund, such as the Barclays Multi-Asset Balanced Income Fund. In up markets, such as 2019, we usually see a risk profile 2 fund lag behind a risk profile 3 fund and the reverse happens in down markets. Various remedial action has taken place over the past several years to improve performance (see "Introduction to the Assessment of Value" for further details). An update to the Fund's SAA in 2023 will help it continue to deliver on its long-term investment objectives. We are satisfied that the Fund is delivering on its investment objective but we will continue to monitor performance in future assessments.	
Economies of Scale	Where economies of scale are possible, the full benefits are passed onto investors. This is because when the AUM of the Fund grows, the OGC will reduce due to the fixed costs e.g. legal fees. In addition, with certain third party providers we operate on a tiered fee structure which means as the AUM increases, the marginal cost of those services decreases. However, where charges are made on a percentage basis, it is not possible to achieve economies of scale. We found no instances where economies of scale existed but are not passed on to investors.	
Quality of Service	Our analysis has found that the Fund is delivering a good quality of service to investors. As part of the investment management process, we have committed significant resources into developing long terms asset allocations for the different portfolios with each designed to achieve the optimal balance of risk and reward for our investors. The Fund benefits from robust risk management, oversight, and governance processes to ensure that the Fund continues to comply with regulations and meet the needs of our investors.	
General Fund Costs	We have a stringent framework in place to monitor and manage the costs of the Funds, with any concerns escalated to the BAML Board. We uphold discipline in how we manage these, particularly in how we allocate cost, where BISL/ BAML will pay for certain costs that should not be borne by the investor. We are satisfied that the costs to the Funds are reasonable and the charges for each of the Funds are justified in the context of the overall value delivered to investors. We are comfortable that the Fund is making reasonable profits at levels that are not considered excessive.	
Comparable Services	The Barclays Multi-Asset Cautious Income Fund has been compared to the Barclays Multi Manager Portfolio 2, domiciled in Luxembourg, and the Barclays Multi-Asset Cautious Fund, which has the same risk profile and domiciled in the UK. The Multi-Asset Cautious Income Fund has a lower OGC and AMC than both comparable funds. This is because multi-asset income funds tend to have a lower AMC than funds without an income component. Therefore we are comfortable with the level of fees and satisfied that the Fund continues to deliver value.	







Criteria	Summary	Rating
Comparable Market Rates – A Class	The OGC and AMC are amongst the lowest in the identified peer group. Historically, the AMC for income funds has been lower compared to funds without the 'income' component. This is mainly due to the difference in the expected returns of income funds, and investors are compensated for this with a lower AMC. We believe the Fund is delivering value and no imminent action is required. However, we are reviewing the income funds due to declining AUM which may inflate costs for direct investors in the future.	
Comparable Market Rates – R Class	The OGC is 0.05% higher than the average of the peer group, whilst the AMC is lower than the average of the peer group. Historically, the AMC for income funds has been lower compared to funds without the 'income' component. This is mainly due to the difference in the expected returns of income funds, and investors are compensated for this with a lower AMC. We believe the Fund is delivering value and no imminent action is required. However, we are reviewing the income funds due to declining AUM which may inflate costs for direct investors in the future.	
Classes of Units	There are two classes of units within the Barclays Multi-Asset Cautious Income Fund. The R class of unit is available through intermediating platforms and propositions and the A/B class of unit has been historically available to direct investors. We are comfortable with the 0.30% difference in AMC and the 0.05% difference in registration fee between A and R class of units, due to the different distribution channels and service needs typical of the investor type.	
Summary	We have looked across the various criteria of the Fund, whether that is through the savings investors can achieve through economies of scale, or the quality of service we provide, in order to make an assessment on the value delivered to our investors. We believe that the Fund continues to offer some value and, given the extensive remedial action we have taken over the past several years (set out in the "Introduction to the Assessment of Value" section), we believe no action is required at this time. Whilst the performance of the Fund has lagged, we are confident that these changes will continue to have a positive impact on the value of the Fund going forward.	

## Barclays Multi-Asset Balanced Income Fund



**Investment Objective:** The Fund seeks to provide capital growth and income over the long term (a period of at least 5 years).




Criteria	Summary	Rating
Performance	The Fund achieved the income component of its investment objective, delivering higher yields than comparators, but struggled to meet the capital growth requirement over 5 years. The Fund is maintaining a positive level of return over its track record and performed in line with its SAA and comparators over the last 12 months. However, the Fund lagged its SAA and comparators over 3 and 5 years given the focus on income. Various remedial action has taken place over the past several years to improve performance (see "Introduction to the Assessment of Value" for further details). An update to the Fund's SAA in 2023 will help it continue to deliver on its long-term investment objectives. We are satisfied that the Fund is delivering on its investment objective but we will continue to monitor performance in future assessments.	
Economies of Scale	Where economies of scale are possible, the full benefits are passed onto investors. This is because when the AUM of the Fund grows, the OGC will reduce due to the fixed costs e.g. legal fees. In addition, with certain third party providers we operate on a tiered fee structure which means as the AUM increases, the marginal cost of those services decreases. However, where charges are made on a percentage basis, it is not possible to achieve economies of scale. We found no instances where economies of scale existed but are not passed on to investors.	
Quality of Service	Our analysis has found that the Fund is delivering a good quality of service to investors. As part of the investment management process, we have committed significant resources into developing long terms asset allocations for the different portfolios with each designed to achieve the optimal balance of risk and reward for our investors. The Fund benefits from robust risk management, oversight, and governance processes to ensure that the Fund continues to comply with regulations and meet the needs of our investors.	
General Fund Costs	We have a stringent framework in place to monitor and manage the costs of the Funds, with any concerns escalated to the BAML Board. We uphold discipline in how we manage these, particularly in how we allocate cost, where BISL/ BAML will pay for certain costs that should not be borne by the investor. We are satisfied that the costs to the Funds are reasonable and the charges for each of the Funds are justified in the context of the overall value delivered to investors. We are comfortable that the Fund is making reasonable profits at levels that are not considered excessive.	
Comparable Services	The Barclays Multi-Asset Balanced Income Fund has been compared to the Barclays Multi Manager Portfolio 3, domiciled in Luxembourg, and the Barclays Multi-Asset Balanced Fund and Barclays Multi-Asset Sustainable Fund, which have the same risk profile and domiciled in the UK. The Barclays Multi-Asset Balanced Income Fund has a lower OGC and AMC compared to its Luxembourg equivalent and Barclays Multi-Asset Balanced Fund but a higher OGC and AMC than the Barclays Multi-Asset Sustainable Fund. Multi-asset income funds tend to have a lower AMC than funds without an income component and we continue to demonstrate market practice, particularly compared to the Barclays Multi-Asset Balanced Fund. Therefore, we are comfortable with the level of fees and satisfied that the Fund continues to deliver value.	

Criteria	Summary	Rating
Comparable Market Rates – A Class	The OGC is in line with the average of the peer group, whilst the AMC is lower than the average of the peer group. When taking into consideration the services provided, such as SAA, TAA, manager selection and portfolio construction whilst being reflective around historical pricing models for income focused products, we believe the Fund is delivering value and no imminent action is required. However, we are reviewing the income funds due to declining AUM which may inflate costs for direct investors in the future.	
Comparable Market Rates – B Class	The OGC is in line with the average of the peer group, whilst the AMC is lower than the average of the peer group. When taking into consideration the services provided, such as SAA, TAA, manager selection and portfolio construction whilst being reflective around historical pricing models for income focused products, we believe the Fund is delivering value and no imminent action is required. However, we are reviewing the income funds due to declining AUM which may inflate costs for direct investors in the future.	
Comparable Market Rates – R Class	The OGC is higher than the peer group average, whilst the AMC is lower than the peer group average. This is because competitors may invest in passive solutions which leads to a lower OGC. In general terms, we believe that the Fund has an appropriate level of charges compared to peers when taking into consideration the services provided, such as SAA, TAA, manager selection and portfolio construction whilst being reflective around historical pricing models for income focused products. We believe the Fund is delivering value and no imminent action is required. However, we are reviewing the income funds due to declining AUM which may inflate costs for direct investors in the future.	
Classes of Units	There are three classes of units within the Barclays Multi-Asset Balanced Income Fund. The R class of unit is available through intermediating platforms and propositions and the A/B class of unit has been historically available to direct investors. We are comfortable with the 0.30% difference in AMC and the 0.05% difference in registration fee between A/B and R class of units, due to the different distribution channels and service needs typical of the investor type.	
Summary	We have looked across the various criteria of the Fund, whether that is through the savings investors can achieve through economies of scale, or the quality of service we provide, in order to make an assessment on the value delivered to our investors. We believe that the Fund continues to offer value and, given the extensive action we have taken over the past several years (set out in the "Introduction to the Assessment of Value" section), we believe no action is required at this time. Whilst the performance of the Fund has lagged, we are confident that these changes will continue to have a positive impact on the value of the Fund going forward.	

## Barclays Multi-Asset Sustainable Fund






**Investment Objective:** The Fund seeks to provide capital growth and income over the long term (a period of at least 5 years).



Criteria	Summary	Rating
Performance	The Fund is performing in line with its investment objective and expectations, while maintaining a positive level of return over its track record. The Fund performed well against its comparator over 5 years, however it did not perform as anticipated over the shorter term and against its SAA over all periods assessed, largely due to the impact of the events in Ukraine over the past 12-18 months. The investment policy of the Sustainable Fund restricts access to traditional energy markets, which is not the case with comparators, impacting short term returns. Various remedial action has taken place over the past several years to improve performance (see "Introduction to the Assessment of Value" for further details). An update to the Fund's SAA in 2023 will help it continue to deliver on its long term investment	
Economies of Scale	objectives. We are satisfied that the Fund is continuing to deliver value for the investor and has been given a green rating.	
Quality of Service	Where economies of scale are possible, the full benefits are passed onto investors. This is because when the AUM of the Fund grows, the OGC will reduce due to the fixed costs e.g. legal fees. In addition, with certain third party providers we operate on a tiered fee structure which means as the AUM increases, the marginal cost of those services decreases. However, where charges are made on a percentage basis, it is not possible to achieve economies of scale. Finally, the operating costs for all shares classes are capped which prevents any diseconomies of scale and adds further value to the investor. We found no instances where economies of scale existed but are not passed on to investors.	
General Fund Costs	Our analysis has found that the Fund is delivering a good quality of service to investors. As part of the investment management process, we have committed significant resources into developing long terms asset allocations for the different portfolios with each designed to achieve the optimal balance of risk and reward for our investors. The Fund benefits from robust risk management, oversight, and governance processes to ensure that the Fund continues to comply with regulations and meet the needs of our investors.	
Comparable Services	<p>We have a stringent framework in place to monitor and manage the costs of the Funds, with any concerns escalated to the BAML Board. We uphold discipline in how we manage these, particularly in how we allocate cost, where BISL/ BAML will pay for certain costs that should not be borne by the investor. We are satisfied that the costs to the Funds are reasonable and the charges for each of the Funds are justified in the context of the overall value delivered to investors. We are comfortable that the Fund is making reasonable profits at levels that are not considered excessive.</p> <p>The Barclays Multi-Asset Sustainable Fund has been compared to the Barclays Multi Manager Portfolio 3, domiciled in Luxembourg, and the Barclays Multi-Asset Balanced Fund and Barclays Multi-Asset Balanced Income Fund, which have the same risk profile and domiciled in the UK. The Multi-Asset Sustainable Fund has a lower AMC than all other comparable funds. In addition, due to low levels of AUM, the operating costs of the fund are capped in order to prevent diseconomies of scale. This had led to a lower OGC compared to the vast majority of the Fund's comparators and therefore we are comfortable with the level of fees and satisfied that the Fund continues to deliver value.</p>	

Criteria	Summary	Rating
Comparable Market Rates – I Class	The OGC is lower than the comparable share class of its identified peer. Given the unique nature of the Fund having sustainability considerations, this is an attractive price for a sustainable active fund of funds and, in general terms, we believe that the Fund is delivering excellent value compared to peers when taking into consideration the services provided, such as SAA, TAA, sustainability considerations, manager selection, and portfolio construction.	
Comparable Market Rates – R Class	The OGC is in line with the peer group average, whilst the AMC is lower than the peer group average. Barclays Multi-Asset Sustainable Fund has an AMC of 0.50% which was discounted to 0.25% since inception until August 2022 in order to attempt to attract assets. Following the increase in OGC since the end of the discount, we still believe the fund has an attractive price for a sustainable active fund of funds and, in general terms, we believe that the Fund is delivering excellent value compared to peers when taking into consideration the services provided, such as SAA, TAA, sustainability considerations, manager selection and portfolio construction.	
Classes of Units	There are two classes of units within the Barclays Multi-Asset Sustainable Fund. The R class of unit is available through intermediating platforms and propositions and the I class of unit is available to institutional investors. The 0.25% discount on the R class of unit AMC that had been in place since launch to reduce costs for investors as the Fund’s AUM increased, ended in August 2022. The fees of both share classes are currently aligned and we are comfortable with the undiscounted 0.50% AMC of the I and R class of unit. In addition, As part of this year’s review we are recommending to reduce the registration fee for the I share class in line with Global Markets Z share class. This will ensure pricing points across comparable units for different funds are consistent.	
Summary	We have looked across the various criteria of the Fund, whether that is through the savings investors can achieve through economies of scale, or the quality of service we provide, in order to make an assessment on the value delivered to our investors. We believe that the Fund continues to offer good value to investors.	

## Barclays Charity Fund

**Investment Objective:** The Trust seeks to provide income and capital growth over the long term (a period of at least 10 years).

Criteria	Summary	Rating
Performance	The Fund is performing in line with its investment objective and expectations, while maintaining a positive level of return over its track record. The Fund outperformed its comparator over 1, 3, 5 and 10 years and performed well against the SAA over 5 and 10 years. This is due to strong asset allocation and selection of developed market equities and third party funds. Various remedial action has taken place over the past several years to improve performance (see "Introduction to the Assessment of Value" for further details). An update to the Fund's SAA in 2023 will help it continue to deliver on its long term investment objectives. We are satisfied that the Fund is continuing to deliver value for the investor and has been given a green rating.	
Economies of Scale	Where economies of scale are possible, the full benefits are passed onto investors. This is because when the AUM of the Fund grows, the OGC will reduce due to the fixed costs e.g. legal fees. In addition, with certain third party providers we operate on a tiered fee structure which means as the AUM increases, the marginal cost of those services decreases. However, where charges are made on a percentage basis, it is not possible to achieve economies of scale. We found no instances where economies of scale existed but are not passed on to investors.	
Quality of Service	Our analysis has found that the Fund is delivering a good quality of service to investors. As part of the investment management process, we have committed significant resources into developing long terms asset allocations for the different portfolios with each designed to achieve the optimal balance of risk and reward for our investors. The Fund benefits from robust risk management, oversight, and governance processes to ensure that the Fund continues to comply with regulations and meet the needs of our investors.	
General Fund Costs	We have a stringent framework in place to monitor and manage the costs of the Funds, with any concerns escalated to the BAML Board. We uphold discipline in how we manage these, particularly in how we allocate cost, where BISL/ BAML will pay for certain costs that should not be borne by the investor. We are satisfied that the costs to the Funds are reasonable and the charges for each of the Funds are justified in the context of the overall value delivered to investors. We are comfortable that the Fund is making reasonable profits at levels that are not considered excessive.	
Comparable Services	Whilst the Barclays Charity Fund follows the same risk profile framework as the other UK-domiciled multi-asset funds, it is managed slightly differently given the longer term investment objective and underlying asset classes. Therefore, there is no comparable fund for the Barclays Charity Fund but we are comfortable with the level of fees and we are satisfied that the Fund continues to deliver value.	

Criteria	Summary	Rating
Comparable Market Rates – R Class	The OGC of the Barclays Charity Fund is lower than the peer group. This is because the Fund invests in direct securities, as well as fund of funds, whilst BAML cap the third party costs. This makes the overall cost very competitive compared to peers. We are comfortable with the current level of fees and there is no intention to change the current structure	
Classes of Units	There is only one class of unit for the Fund and we are comfortable with the pricing of this class of unit.	
Summary	We have looked across the various criteria of the Fund, whether that is through the savings investors can achieve through economies of scale, or the quality of service we provide, in order to make an assessment on the value delivered to our investors. We believe that the Fund continues to offer good value and, given the extensive action we have taken over the past several years (set out in the “Introduction to the Assessment of Value” section), we believe no action is required at this time. We are confident that these changes will continue to have a positive impact on the value of the Fund going forward.	

# BAML Board of Directors



## Damian Neylin

Damian is the Chair of the Board. He is a chartered accountant and was an Audit Partner on major financial services clients for 21 years of his 35 year career at PwC Ireland. He led, at different times, the financial services and asset management businesses. Damian also served as Chair of the Board of Partners and chaired/participated in a number of external Funds & financial services bodies in Ireland.



## David Cavaye

David is a Non-Executive on the Board. He is a chartered accountant with an executive career spanning over 25 years' in the Investments industry, managing both institutional and private client model strategies. Most latterly this was as the Chief Investment Officer at C Hoare & Co. David has held a number of leadership roles throughout his career including management committee memberships.



## Nicola Eggers

Nicola is an executive director and CEO, with over 25 years' experience across the Wealth and Investment Management industry at Barclays. During her career, she has led, hired, and developed senior client advisers, investment and product professionals, driving improvements for clients through product, proposition, people, sales processes, and technology enhancements.



## James Mack\*

James is an executive director and CFO. He is a chartered accountant and is an experienced CFO with a strong track record of performance across various financial organisations and Banking, Treasury, Capital Markets, Management and Mergers & Acquisitions sectors. Before joining Barclays, James was CFO at Aldermore Bank leading the business through transition to public ownership.



## Mark Newbery

Mark is an executive director and CFO. Mark has been the Financial Director for Consumer Banking and Payments since September 2022. Having joined Barclays 17 years ago from Citigroup Global Markets, he has had vast experience in various roles spanning CFO for Wealth and Investment Management, Head of Business development for the US Wealth Business, Controller for Barclays UK, and later Group Head of Strategy and M&A.

\*Please note that James Mack stepped down as executive director and CFO, effective 1st May 2023, and his place taken by Mark Newbery.





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