



— CONSUMER DUTY SUPPLEMENT

Purpose

This document is intended to assist clients and intermediaries in understanding the **investment services** provided by Waverton Investment Management (“**Waverton**”). Clients and intermediaries should carefully read the details before deciding on the investment service and mandate appropriate for their needs, characteristics and objectives.

This document meets Waverton’s obligations for investment services under the Financial Conduct Authorities (“**FCA**”) Consumer Duty regime. It is intended for financial advisers, introducers and clients to aid understanding and decision-making.

About Waverton

Waverton Investment Management is a discretionary investment service provider to private clients, institutions and charities through segregated and platform-based portfolios with a total asset under management of £9.5bn as at 31st March 2023.

Segregated portfolios are for direct clients of Waverton who will have a dedicated Portfolio Manager and associated team assigned to manage their accounts in line with the agreed investment mandate.

Platform-based portfolios are for indirect clients of Waverton whereby Waverton will manage these clients’ assets in line with the pre-defined investment mandate selected by the relevant client’s chosen investment adviser.

Types of clients

Waverton currently accepts any of the following types of clients:

- Individuals
- Trusts
- Companies
- Charities
- Funds / Pooled Investment Vehicles

Types of accounts / tax wrappers

Waverton currently services the following types of account structures or tax wrappers:

- General investment account
- Individual Savings Account (“ISA”)
- Pensions – Self Invested Pension Plan (“SIPP”)
- Pensions – Small Self-Administered Scheme (“SSAS”)
- Offshore Bonds
- Onshore Bonds
- Corporation of Lloyds
- Protected Cell Companies (“PCC”)

Investment Mandates

The following investment mandates are available at Waverton:

- Equity
- Growth
- Balanced
- Cautious
- Defensive
- Conservative
- Bonds

Refer to the Waverton website (<https://www.waverton.co.uk>) or literature from your Waverton contact for further information. For directly-invested clients in particular, refer to the “Guide to our Investment Mandates” for more information on the investment mandates available.

Please note: our definitions of the investment mandates may differ from other firms’ definitions so it is important that you understand your decision by reading the descriptions within our Waverton literature to understand fully the implications of your mandate choice. This document is not intended to be relied upon as investment advice.

INVESTMENT MANDATE	NEUTRAL EQUITY WEIGHTING	EQUITIES RANGE	BONDS & CASH RANGE	ALTERNATIVES RANGE	INVESTMENT OBJECTIVE
Equity	100%	65-100%	0-35%	0-20%	CPI + 4.5%
Growth	75%	55-90%	5-45%	0-25%	CPI + 3.5%
Balanced	60%	40-80%	15-60%	0-35%	CPI + 3.0%
Cautious	45%	30-60%	20-70%	0-45%	CPI + 2.5%
Defensive	33%	20-45%	25-80%	0-50%	CPI + 2.0%
Conservative	20%	10-35%	30-60%	0-50%	CPI + 1.5%
Bonds	0%	0%	80-100%	0-20%	CPI + 0.5%

Investment Services – Target Market

A “target market” are those clients whose needs, characteristics and objectives are compatible with our investment mandates.

Our investment mandates are available for both Retail and Professional clients. We do not distinguish between a client’s investment knowledge or experience as Waverton will act in the capacity of a discretionary investment manager, making trading decisions for and on behalf of the client. Our investment mandates and services are available to all clients that:

- are comfortable with exposure to investment risk;
- have the capacity and willingness to accept a degree of capital loss; and
- are comfortable with investing for the recommended minimum time horizon (see below).

Each of our investment mandates has a recommended minimum investment time horizon – the minimum period we suggest clients invest to maximise the chances of meeting their investment objectives. Performance of the portfolio should be viewed with these horizons in mind.

Riskier mandates require a longer investment time horizon due to larger exposures to more volatile asset classes such as equities.

The following table provides an overview of the recommended minimum investment time horizon for each investment mandate:

INVESTMENT MANDATE	MINIMUM INVESTMENT TIME HORIZON
Equity	8 years
Growth	7 years
Balanced	6 years
Cautious	5 years
Defensive	4 years
Conservative	3 years
Bonds	3 years

Investment Services – Negative Target Market

A “negative target market” are those clients or groups for whose needs, characteristics and objectives our investment mandates are not compatible.

Waverton’s investment mandates and services are not suitable for clients:

- seeking full capital protection;
- having no ability to bear investment losses; or
- requiring guaranteed income or guaranteed returns.

Investment Services – Distribution Strategy

Waverton’s investment services to retail clients are split between three business lines:

- Private clients
- Charities
- Adviser Solutions

Further information is available for our investment services on our website.

The table below provides an indication as to how investors are able to access Waverton’s investment mandates and above investment services.

DISTRIBUTION STRATEGY		PRIVATE CLIENTS	CHARITIES	ADVISER SOLUTIONS
Direct clients	Advised / Introduced	✓	✓	✓
	Unadvised	✓	✓	✓
Indirect clients (Platform-based)	Advised / Introduced			✓

Investment Services – Assessment of Value

As a discretionary investment manager, Waverton is required by the FCA to review its investment services to provide an indication as to the value (benefits) provided to clients against the costs to be incurred.

Each of our investment services are reviewed prior to launch, prior to significant changes as well as on an ongoing basis to ensure they continue to provide value to clients.

The objective of these assessments is to confirm that clients will receive fair value for making their decision to invest within one of Waverton's investment mandates and investment service lines.

In undertaking these assessments, the following aspects were taken into consideration:

- Investment returns generated over a range of periods, including the recommended minimum investment time horizon;
- Fees paid by clients, including overall fees that include costs of investments held within a client's portfolio;
- Other benefits received by clients, including access to Portfolio Managers or other investment personnel at Waverton, ability to attend Waverton-hosted events and access to Waverton literature and views;
- Quality of service provided to clients based on servicing and portfolio management errors made by Waverton;
- Volume and materiality of complaints raised (if any) and the timeliness of resolution;
- Results from client and financial adviser surveys;
- Any other reviews conducted, such as by internal audit, external audit or the regulator, the FCA; and
- Industry recognition, such as awards that link into good client outcomes.

The below table depicts the conclusion from the fair value assessments undertaken.

ASSESSMENT OF VALUE		PRIVATE CLIENTS	CHARITIES	ADVISER SOLUTIONS
Direct clients	Advised / Introduced			
	Unadvised			
Indirect clients (Platform-based)	Advised / Introduced	n/a	n/a	

KEY:

Green	Provides value to clients
Amber	Provides value in most but not all areas; additional monitoring and/or further action has been proposed
Red	Has not provided value; appropriate further action is required

Consumer Understanding

To aid understanding of our investment mandates and investment services, the following can be relied upon by our clients:

- Interaction and discussion with dedicated Portfolio Managers;
- Waverton literature stored on our website, <https://www.waverton.co.uk>;
- Legal documents stored on our website, <https://www.waverton.co.uk/legal-regulatory>;
- Guide to our Investment Mandates
- Quarterly booklets and factsheets;

- Suitability Flyer, issued annually within quarterly booklets;
- Access to Waverton-organised events, podcasts and market commentary;
- Access to Waverton's website as a store of important documents, information and aides; and
- Access to Waverton's public social media content, including important updates and informative material.

Consumer Support

To support our clients in pursuing their investment objectives, Waverton provides the following support:

- Ability to contact dedicated Portfolio Managers or their team assistants by phone, face-to-face, over e-mail or through digital videocalls;
- Team assistants are available to support the Portfolio Manager in administrative tasks and able to handle client calls and queries;
- Online portal access as an easy source of storage of documents, such as quarterly valuation booklets;
- Provision of documents and reports in braille format, if required; and
- Ongoing support to clients displaying vulnerable characteristics through more regular interaction by Portfolio Managers.

**Investment insight and commentary**

We publish regular and ad hoc commentary on the markets which are available via email or in print

**Why Invest? Podcast**

Our award-winning podcast, Why Invest? hosted by Portfolio Manager, Douglas Barnett is also available via all major platforms including Apple Podcasts and Spotify and on our website

**Subscribe to receive updates online**

Stay up to date with our latest news and insights, register to receive email alerts via www.waverton.co.uk/Insights

**Follow us on LinkedIn**

We publish all our news and updates on social media – follow us on www.linkedin.com/company/waverton-investment-management

Contact us

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