

Conducted by Equity Trustees Fund Services Ltd

For accounting period end – 29 February 2024



ES ALLIANCEBERNSTEIN
UK OEIC
ASSESSMENT OF VALUE



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WHAT IS AN ASSESSMENT OF VALUE?

As an Authorised Corporate Director (the “ACD”), Equity Trustees Fund Services Ltd is regulated by the Financial Conduct Authority (FCA). In 2019 the FCA introduced new rules to strengthen the duty of ACDs to act in investors’ best interests. These new rules require all ACDs to conduct an annual detailed assessment of their funds to determine if they are providing value to their investors. Following each review, we are required to publish a statement summarising the outcomes of our assessment.

When assessing value, we consider much more than just the costs (including fees) that you pay or the performance of the Fund. Set out below are the seven ‘Value Criteria’ that we use within each of our assessments.

ASSESSMENT OF VALUE CRITERIA

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

It is the responsibility of our board of directors to consider the outcomes of these assessments and to ensure that our assessment process, our findings, and our conclusions are fair, appropriate, and clearly communicated to you.

Within this report you will find a detailed breakdown of the areas that we have considered when conducting our assessment along with a conclusion for each of the seven criteria. We have also included an Overall Assessment Conclusion and where applicable, details of any steps taken as a result of our assessment.

This report provides you with our assessment of whether the Fund, in our opinion, has provided value to you as an investor. When coming to our conclusion we consider a wide range of investor types with potentially differing investment needs and can only base our conclusion on information that is available to us. As ‘value’ is a personal view taking into consideration many individual factors, our overall conclusion may not align to your personal view on whether you believe that you are receiving ‘good value’ from your investment. Should your view differ from our own conclusions, we would recommend that you discuss this with your Financial Adviser (if relevant).



ASSESSMENT PERIOD

The Assessment Period in this Report is from 1 March 2023 to 29 February 2024.

OVERALL ASSESSMENT CONCLUSIONS

The Board of Equity Trustees Fund Services Ltd (the “Board”) has concluded that ES AllianceBernstein UK OEIC and its Sub-Funds have provided overall value for its investors over the stated assessment period.

The table below outlines the results of our assessment, and the following pages provide further details around the ratings provided.

	Overall Conclusion	Quality of Service	Fund Performance	Costs	Economies of Scale	Comparable Market Rates	Comparable Services	Classes of Units
ES AllianceBernstein Concentrated Global Equity Fund	●●	●●●	●●	●●●	●●●	●●●	●●●	●●●
ES AllianceBernstein Concentrated US Equity Fund	●●●	●●●	●●●	●●●	●●●	●●●	●●●	●●●
ES AllianceBernstein Europe (Ex UK) Equity Fund	●●	●●●	●●	●●●	●●●	●●●	●●●	●●●
ES AllianceBernstein Low Volatility Global Equity Fund	●●●	●●●	●●●	●●●	●●●	●●●	●●●	●●●
ES AllianceBernstein Sustainable Global Equity Fund	●●●	●●●	●●●	●●●	●●●	●●●	●●●	●●●
ES AllianceBernstein Sustainable US Equity Fund	●●●	●●●	●●●	●●●	●●●	●●●	●●●	●●●

- = The Fund has provided value for its investors
- = The Fund has provided value for its investors, but further action or monitoring is required
- = The Fund has not provided value for its investors

Dallas McGillivray

Chair and Independent Director, Equity Trustees Fund Services Ltd



ASSESSMENT CRITERIA

1. QUALITY OF SERVICE

Are the range and quality of services provided to The Fund and its investors of a standard that would represent good value?

What does this criterion cover?

Within the ‘Quality of Service’ criterion of the assessment we assess the range and quality of the services that have been provided to the Fund and its investors by the ACD, the Investment Manager, the Transfer Agent & Registrar, the Fund Accountant, the Custodian, and the Fund’s Auditor.

When we consider the quality of the services, we assess a number of factors relevant to each of the services that has been provided. We also consider how relevant the service is to you as an investor and how it impacts on your investment experience.

What did we review?

The assessment involved a review of relevant key performance indicators (“KPIs”) to monitor the services that has been provided by the key suppliers and delegates. In the assessment, we also reviewed any findings from our ongoing Operational and Compliance Oversight activities.

We also consider internal KPIs to assess our own performance as the Funds’ ACD.

2. FUND PERFORMANCE

Is the performance of the Fund, after the deduction of charges¹, in line with the Fund’s stated Investment Objectives?

What does this criterion cover?

Within the ‘Fund Performance’ criterion of the assessment, we assess how the Fund has performed against its stated Investment Objectives (as set out in the Prospectus), after all fees have been paid.

The Fund’s performance is assessed over an appropriate timeframe, and we also consider the Fund’s Investment Policy and Strategy as part of this criterion of the assessment.

What did we review?

We reviewed the Fund’s performance (after the deduction of charges) against its stated Investment Objectives, which can be to generate capital growth and/or income. For some Funds, the Investment Objective may also contain a volatility target². Where such a target exists, we will additionally consider this alongside the Fund’s primary objective.

Where a Fund has no stated performance Target Benchmark within its Investment Objective, we will compare the Fund’s performance against its Comparator Benchmark.

Where a Fund has been operating for longer than 5 years, we review the 5-year total return on the last dealing day of each calendar month for the 12 months in the stated assessment period. We then take an average of these 12 performance data points to produce an average rolling 5-year performance figure for our review.

Where a Fund has been operating for less than 5 years, we will apply a similar approach but over a shorter period. Details of the approach taken for each Fund can be found in the Fund specific pages of this review.

¹ Performance after the deduction of charges, also referred to as ‘performance net of fees’ shows the fund’s return after the deduction of expenses, which is the return the fund has earned for the investors.

² Volatility target is a target range the fund manager aim to control the rises and falls of the fund in a short period.



To help you with your own review of a Fund's performance, we will additionally provide details of following information in the report:

- Where a Fund has more than 1 year of performance data available for review, we will additionally provide the 'annualised' performance figure. This figure enables investors to better compare the performance of the Fund to cash based products such as a standard bank account. Note: The annualised performance figure is produced on a compound basis³.
- An illustration of the impact of the Fund's performance on a single £1,000.00 investment over a full 12-month period. Assuming that the Investment was made into the primary share class of the Fund, on the accounting end date of the previous reporting period.
- An illustrative indication of the impact of Costs and Charges, which is represented by the Ongoing Charges Figure ('OCF') on the same £1,000.00 investment based on the latest published OCF for the Fund. Note: this figure is provided for illustrative purposes only and may not be the actual value charged due to the daily fluctuations in the valuation of the Fund. Investors should also note that the costs and charges represented by the OCF are deducted from the scheme property of the Fund and are reflected in the daily published Net Asset Value ('NAV') of the Fund. Such OCF is not a charge to any investor's account.

3. COSTS

Are the costs of providing the services to the Fund reasonable and fair, and are the services associated with the costs provided on a competitive basis?

What does this criterion cover?

Within the assessment we consider the costs charged to the Fund, which includes the ACD Cost, Investment Manager Fee, and other elements which make up the overall OCF such as Supplier Costs. Our assessment focuses on whether these costs are reasonable for the service provided and whether they are clearly and transparently disclosed to Fund's investors.

What did we review?

We reviewed each of the service costs charged to the Fund over the review period to assess whether the costs are fair for the services provided. We additionally compared the costs against a limited amount of available market data to ensure that the costs are reasonable.

4. ECONOMIES OF SCALE

Where available, have the benefits generated through economies of scale been passed on to investors?

What does this criterion cover?

When Funds grow, the Fund typically pays proportionally less for the fixed costs of operating the Fund. As Funds increase in size, they will also typically be able to benefit from reductions in fees from service providers as they are able to leverage economies of scale to generate operational efficiencies. In this criterion, we assess if all achievable economies of scale have been passed onto the Fund to benefit you as an investor.

What did we review?

We reviewed the tariffs for each of the key suppliers and delegates that provide key services to the Fund. Where these tariffs allowed for reductions in fees as the size of the Fund increases, we reviewed to ensure that these reductions of fees have been applied to the Fund and savings are passed on to investors.

Additionally, we considered whether there had been any changes to the environment or conditions under which each key supplier and delegate operates, to assess if any change had resulted in further economies of scale and whether these have been passed on to investors.

³ Compound basis means the interest is calculated on the principal amount and the accumulated interest of previous periods, and thus can be regarded as "interest on interest."



5. COMPARABLE MARKET RATES

Are the Funds' costs reasonable when compared to other comparable funds?

What does this criterion cover?

In this criterion we review the OCF of the Fund to assess whether it's comparable to a focused peer group of funds in the market, where the focused peer group is formed by funds of a similar size, complexity, structure, and that have a similar Investment Objective and policy. This review enables us to evidence that the Fund remains competitively priced.

What did we review?

We reviewed the OCF of the Fund's primary Share Class, as of the end of the accounting period, against the average OCF for the Primary Share Class of the focused peer group of funds.

6. COMPARABLE SERVICES

Are the services provided to the Fund 'good value' when compared to other comparable services provided by the ACD?

Comparable services could include Funds of a similar size with similar Investment Objectives and policies operated in another jurisdiction or individual mandates operated for Institutional Investors.

What does this criterion cover?

Within this criterion we compare the costs of the Fund to the costs of other similar investment products or services that we offer to assess whether any differences are considered to be appropriate.

What did we review?

We do not currently offer any similar investment products or services to investors and therefore no review was undertaken in this criterion.

7. CLASSES OF UNITS

Do any investors hold shares in classes subject to higher charges than those applying to other classes with substantially similar rights and features? If they do, are these higher charges justified?

What does this criterion cover?

Funds can offer different share classes to investors; usually that have different characteristics such as different minimum initial investment amounts and/or different cost structures.

Typically, the larger the minimum initial investment amount, the lower the charge for managing the underlying investments. This is similar to getting a cheaper price for buying a product in bulk rather than one at a time. For this reason, when you invest through a third party like an investment platform or a financial adviser, your money is often pooled with others and this pooling may provide you with access to a cheaper share class than if you were to invest directly.

What did we review?

The assessment reviewed and determined: if investors are invested in the appropriate share class; and if there's any investors in a class with higher charges when there is a cheaper alternative available to them.



FUND SPECIFIC CONCLUSIONS

ES ALLIANCEBERNSTEIN CONCENTRATED GLOBAL EQUITY FUND*

*This Fund will be terminated before 31 July 2024.

●●● Quality of Service

We concluded that, based on the areas assessed, the ACD and our key service suppliers/delegates have provided a comprehensive range of services to the Fund and its investors, which are being delivered to a high standard resulting in good value for investors.

●● Performance

Investment Objective <i>Note: The Fund is managed with an aim of achieving its Investment Objective over a rolling 5-year period. There is no guarantee that the Fund will achieve its Investment Objective, and there may be periods of time within the rolling 5 years where the objective is not met.</i>	The investment objective of the Fund is to achieve an increase in the value of its investment over a rolling 5-year period after the deduction of all fees, through an actively managed, concentrated, high conviction portfolio of shares in global companies.
Target Benchmark	N/A

The objective of the Fund is to achieve an increase in the value of its investment over a rolling 5-year period after the deduction of all fees. As the Fund was launched in March 2020, by the end of the assessment period, the Fund had less than a 4-year performance history. As the Fund had less than a 5-year history we instead reviewed the Fund's rolling 3-Year total returns as an indication of its performance. We reviewed the total returns recorded at the end of each month during the assessment period and noted that the average of the 12 recorded total returns is 14.2%, which indicates that the Fund is achieving its investment objective of increasing the value of its investment.

The Fund is not managed to target or exceed the performance of any specific benchmark, nor are the Investment Manager's investment decisions constrained by any benchmark. However, we invite investors to compare its performance to a comparator (MSCI World Index). When reviewing the performance of the comparator we utilised the same measurements that we use for assessing the Fund's performance. The average of the 12 recorded total returns of the comparator is 38.5%.

We also take the same measurement of the Fund's 1-year total return and noted that on average, the 1-year total return during the assessment period is 0.4%; where the comparator's total return taking the same measurement during the same period is 8.7%.

To further assist with your assessment of the Fund's value in the recent short term, we have illustrated in the below table the return of the Fund, on a single investment of £1,000, over the assessment period. This table also shows you an illustrative impact of the Fund's costs and charges ('OCF') on this return.

	VALUE OF £1,000.00 INVESTMENT ⁵	ILLUSTRATIVE IMPACT OF COSTS AND CHARGES (THE 'OCF') ⁶
I Acc Share Class	£1,004.03	£8.53

Although we are unable to measure the Funds performance over its stated objective horizon of 5 years, we do consider the underperformance gap of the Fund's performance compared to the comparator as being significant. Please see the Overall Conclusion section for further information on the actions being taken.

●●● Costs

Our assessment noted that the costs charged to the Fund are clearly identifiable and have been applied in-line with agreed rates and as disclosed within the prospectus. We are additionally satisfied that the services associated to each cost have been provided on a competitive basis.

We therefore concluded that based on the activity undertaken and the services provided, the ACD and supplier costs applied to the Fund are fair and reasonable and therefore represented good value for investors.



●●● Economies of Scale

The AUM of this Fund was £3.3m by the end of assessment period. Our assessment concluded that during the assessment period, all available economies of scale were utilised with the resulting cost efficiencies being appropriately passed onto the Fund’s investors.

The Investment Manager has been subsidising the Fund to place a cap of 0.1% over the total service fees, which benefits the investors with competitive OCFs in all share classes.

●●● Comparable Market Rates

The table below shows a comparison of the OCF of the primary share class of this Fund with the average OCF of a peer group of similar funds. The OCF of I share class is lower than the average OCF of the peer group; therefore, we have concluded that the Fund costs are reasonable and competitive.

	ONGOING CHARGES FIGURE (OCF)	OCF OF THE PEER GROUP ⁴
I Acc Share Class	0.85%	0.99%

●●● Comparable Services

We concluded that there are no comparable services that we offer to investors.

●●● Classes of Units

	MINIMUM INITIAL INVESTMENT	ONGOING CHARGES FIGURE (OCF)	INVESTMENT MANAGER FEE
I Share Class	£1,000	0.85%	0.75%
Z Share Class	£20,000,000	0.10%	0.00%

The Fund has 2 share classes offered to investors, where I class is for retail & institutional investors based on the value of their initial investment and Z class is for institutional investors who has special fee arrangements with the Investment Manager.

Following our review, we have concluded that during the assessment period, all unitholders in this Fund are in the appropriate share classes, and there are no alternative share class available to any unitholders offering similar rights with lower fees.

●●● Overall Conclusion

Based on the assessment results of the above 7 criteria, the Board has concluded that the Fund does continue to provide overall value to its investors. However, as communicated to investors the ACD has taken the decision to terminate the Fund on or before 31 July 2024.

In our separate communicate to the Funds investors, we noted that the decision to terminate the Fund was taken as a result of the Fund being unable to attract meaningful shareholder investment to enable it to grow to the size and scale which we had originally envisaged. As of 31 March 2024, the Assets under Management (“AUM”) of the Fund was approximately £3.4m. The most significant investment in the Fund continues to be that of the Investment Manager, AllianceBernstein, representing 93% of AUM. Although there have been ongoing reviews of the distribution strategy between the ACD and AllianceBernstein, we do not foresee any future opportunities to grow or develop the Fund.

⁴Source – Data extracted from FE Analytics as of February 2024.



⁵ Based on an investment of £1,000.00 originally made on the last dealing day of the previous accounting period into the Fund's primary share class, revalued on the last dealing day for the accounting period that is applicable to this assessment.

⁶ Calculated by multiplying the illustrative current value of the £1,000 investment by the Fund's published OCF at the latest accounting period end date. Note: this figure is provided purely for illustrative purposes only and may not be the actual value charged due to the daily fluctuations in the valuation of the Fund. Investors should also note that the costs and charges represented by the OCF are deducted from the scheme property rather than individual investor accounts and are reflected in the daily published NAV price for the Fund.

⁷ The ongoing charges figure is estimated because the share/unit class is relatively new and has insufficient track record for us to calculate it exactly.



ES ALLIANCEBERNSTEIN CONCENTRATED US EQUITY FUND

Quality of Service

We concluded that, based on the areas assessed, the ACD and our key service suppliers/delegates have provided a comprehensive range of services to the Fund and its investors, which are being delivered to a high standard resulting in good value for investors.

Performance

Investment Objective <i>Note: The Fund is managed with an aim of achieving its Investment Objective over a rolling 5-year period. There is no guarantee that the Fund will achieve its Investment Objective, and there may be periods of time within the rolling 5 years where the objective is not met.</i>	The investment objective of the fund is to achieve an increase in the value of its investment over a rolling 5-year period after the deduction of all fees, through an actively managed, concentrated, high conviction portfolio of shares in US companies.
Target Benchmark	N/A

The objective of the Fund is to increase in value of its investment over a rolling 5-year period after the deduction of all fees. As the Fund was launched in Mar. 2020, by the end of the assessment period, the Fund had less than 4 years performance history, so we instead reviewed the Fund's rolling 3-Year total returns as an indication of performance. We reviewed the total returns recorded at the end of each month during the assessment period and noted that the average of the 12 recorded total returns is 31%, which indicates the Fund achieved the investment objective of increase in value of its investment.

The Fund is not managed to target or exceed the performance of any specific benchmark, nor are the Investment Manager's investment decisions constrained by any benchmark. However, we invite investors to compare its performance to a comparator (S&P 500 index) and we utilised the same measurements as we did for the Fund's performance, the average of the 12 recorded total returns of the comparator is 45.4%.

We also take the same measurement of the Fund's 1-year total return and noted that on average, the 1-year total return during the assessment period is 4%; where the comparator's total return taking the same measurement during the same period is 9.2%.

To further assist with your assessment of the Fund's value in the recent short term, we have illustrated in below table the return of the Fund, on a single investment of £1,000, over the assessment period. This table also shows you an illustrative impact of the Fund's costs and charges ('OCF') on this return.

	VALUE OF £1,000.00 INVESTMENT ⁵	ILLUSTRATIVE IMPACT OF COSTS AND CHARGES (THE 'OCF') ⁶
I Acc Share Class	£1,039.66	£8.73

We noticed the difference in Fund's performance comparing to the comparator index; however, we also considered in 2023, only 26% of companies outperformed the S&P 500, with 68.4% of the index's return driven by its ten largest companies, highlighting significant market concentration. This environment adversely affected this Fund's diversified portfolio. Holdings with high debt, such as Stericycle, IQVIA, and American Tower, struggled due to rising interest rates, while Aptiv, Nike, and Illumina faced specific challenges. Conversely, contributors like Microsoft, Amazon, and Eaton benefited from cloud growth, cost management, and industry trends. Historically, the portfolio has outperformed in down markets, like in 2002, but lags in highly concentrated growth periods.

Although the Fund's performance is behind the comparator, we consider the 3-year total return of 31% is a good performance for a concentrated strategy and we believe the Fund's strategy of focusing on companies with long-term, stable earnings growth remains robust. Therefore, we concluded the performance of the Fund represented good value for investors.

Costs

Our assessment noted that the costs charged to the Fund are clearly identifiable and have been applied in-line with agreed rates and as disclosed within the prospectus. We are additionally satisfied that the services associated to each cost have been provided on a competitive basis.



We therefore concluded that based on the activity undertaken and the services provided, the ACD and supplier costs applied to the Fund are fair and reasonable and therefore represented good value for investors.

● ● ● Economies of Scale

The AUM of this Fund was £409m by the end of assessment period. Our assessment concluded that during the assessment period, all available economies of scale were utilised with the resulting cost efficiencies being appropriately passed onto the Fund’s investors.

The Investment Manager has been subsidising the Fund to place a cap of 0.1% over the total service fees, which benefits the investors with competitive OCFs in all share classes.

● ● ● Comparable Market Rates

The table below shows a comparison of the OCF of the primary share class of this Fund with the average OCF of a peer group of similar funds. The OCF of I share class is lower than the average OCF of the peer group; therefore, we have concluded that the Fund costs are reasonable and competitive.

	ONGOING CHARGES FIGURE (OCF)	OCF OF THE PEER GROUP ⁴
I Acc Share Class	0.84%	0.93%

● ● ● Comparable Services

We concluded that there are no comparable services that we offer to investors.

● ● ● Classes of Units

	MINIMUM INITIAL INVESTMENT	ONGOING CHARGES FIGURE (OCF)	INVESTMENT MANAGER FEE
I Share Class	£1,000	0.84%	0.75%
Z Share Class	£20,000,000	0.10%	0.00%

The Fund has 2 share classes offered to investors, where I class is for retail & institutional investors based on the value of their initial investment and Z class is for institutional investors who has special fee arrangements with the Investment Manager.

Following our review, we have concluded that during the assessment period, all unitholders in this Fund are in the appropriate share classes, and there are no alternative share class available to any unitholders offering similar rights with lower fees.

● ● ● Overall Conclusion

Based on the assessment results of the above 7 criteria, the Board has concluded the Fund does continue to provide overall value to its investors.

⁴ Source – Data extracted from FE Analytics as of February 2024.

⁵ Based on an investment of £1,000.00 originally made on the last dealing day of the previous accounting period into the Fund’s primary share class, revalued on the last dealing day for the accounting period that is applicable to this assessment.

⁶ Calculated by multiplying the illustrative current value of the £1,000 investment by the Fund’s published OCF at the latest accounting period end date. Note: this figure is provided purely for illustrative purposes only and may not be the actual value charged due to the daily fluctuations in the valuation of the Fund. Investors should also note that the costs and charges represented by the OCF are deducted from the scheme property rather than individual investor accounts and are reflected in the daily published NAV price for the Fund.

⁷ The ongoing charges figure is estimated because the share/unit class is relatively new and has insufficient track record for us to calculate it exactly.



ES ALLIANCEBERNSTEIN EUROPE (EX UK) EQUITY FUND

● ● ● Quality of Service

We concluded that, based on the areas assessed, the ACD and our key service suppliers/delegates have provided a comprehensive range of services to the Fund and its investors, which are being delivered to a high standard resulting in good value for investors.

● ● Performance

Investment Objective <i>Note: The Fund is managed with an aim of achieving its Investment Objective over a rolling 5-year period. There is no guarantee that the Fund will achieve its Investment Objective, and there may be periods of time within the rolling 5 years where the objective is not met.</i>	The investment objective of the fund is to achieve an increase in the value of its investment over a rolling 5-year period after the deduction of all fees through an actively managed, diversified portfolio of shares in European (excluding UK) companies.
Target Benchmark	N/A

The Fund's objective is to increase the value of its investment over a rolling 5-year period after the deduction of all fees. As the Fund launched on 29 Mar. 2019, by the end of the assessment period, the Fund had 4 years and 11 months of performance history, so we reviewed the Fund's total return since inception as a close indication of the 5-year performance. We noted that the total return during this period is 31.8%, therefore the Fund is considered to have achieved the investment objective of increase the value of its investment.

The Fund is not managed to target or exceed the performance of any specific benchmark, nor are the Investment Manager's investment decisions constrained by any benchmark. However, we invite investors to compare its performance to a comparator (MSCI Europe ex UK) and we noted that the total return of the index during the same period is 52.4%.

We also reviewed the Fund's total return on 3-year and 1-year rolling basis, where we reviewed the total returns recorded at the end of each month during the assessment period. We noted that the average of the 12 recorded 3-year total returns is 29% and the average of the 12 recorded 1-year total returns is 10.7%.

This compares to the comparator which recorded an average of the 12 recorded total returns for 5-year, 3-year and 1-year as 52.4%, 32% and 12.5% respectively.

To further assist with your assessment of the Fund's value in the recent short term, we have illustrated in below table the return of the Fund, on a single investment of £1,000, over the assessment period. This table also shows you an illustrative impact of the Fund's costs and charges ('OCF') on this return.

	VALUE OF £1,000.00 INVESTMENT ⁵	ILLUSTRATIVE IMPACT OF COSTS AND CHARGES (THE 'OCF') ⁶
I Acc Share Class	£1,106.89	£8.86

Although the Fund achieved its investment objective to increase the value of its investment, we consider the underperformance gap between the Fund and its comparator to require further monitoring. Over the next assessment period we will continue to work with the Funds Investment Manager to exam the execution of the Funds Investment strategy to see if there are ways in which the gap can be reduced, while staying true to the Funds stated investment Policy and overall strategy.

● ● ● Costs

Our assessment noted that the costs charged to the Fund are clearly identifiable and have been applied in-line with agreed rates and as disclosed within the prospectus. We are additionally satisfied that the services associated to each cost have been provided on a competitive basis.

We therefore concluded that based on the activity undertaken and the services provided, the ACD and supplier costs applied to the Fund are fair and reasonable and therefore represented good value for investors.

● ● ● Economies of Scale



The AUM of this Fund was £409m by the end of assessment period. Our assessment concluded that during the assessment period, all available economies of scale were utilised with the resulting cost efficiencies being appropriately passed onto the Fund’s investors.

The Investment Manager has been subsidising the Fund to place a cap of 0.1% over the total service fees, which benefits the investors with competitive OCFs in all share classes.

••• Comparable Market Rates

The table below shows a comparison of the OCF of the primary share class of this Fund with the average OCF of a peer group of similar funds. The OCF of all share classes are lower than the average OCF of the peer group; therefore, we have concluded that the Fund costs are reasonable and competitive.

	ONGOING CHARGES FIGURE (OCF)	OCF OF THE PEER GROUP ⁴
I Acc Share Class	0.80%	0.98%
F Share Class	0.45%	0.84%
S Share Class	0.60%	0.70%

••• Comparable Services

We concluded that there are no comparable services that we offer to investors.

••• Classes of Units

	MINIMUM INITIAL INVESTMENT	ONGOING CHARGES FIGURE (OCF)	INVESTMENT MANAGER FEE
I Share Class	£1,000	0.80%	0.70%
F Share Class	£5,000,000	0.45%	0.35%
S Share Class	£50,000,000	0.60%	0.50%
Z Share Class	£20,000,000	0.10%	0.00%

The Fund has 4 share classes offered to investors, where I class and S class are for retail & institutional investors based on the value of their initial investment, F class is closed to new investors and Z Class is for institutional investors who has special fee arrangements with the Investment Manager.

Following our review, we have concluded that during the assessment period, all unitholders in this Fund are in the appropriate share classes, and there are no alternative share class available to any unitholders offering similar rights with lower fees.

••• Overall Conclusion

Based on the assessment results of the above 7 criteria, the Board has concluded the Fund does continue to provide overall value to its investors. The ACD will continue to work with the Funds Investment Manager to exam the execution of the Funds Investment strategy to see if there are ways in which the gap between the performance of the Fund and the performance of the comparator benchmark can be reduced, while staying true to the Funds stated investment Policy and overall strategy.

⁴Source – Data extracted from FE Analytics as of February 2024.

⁵Based on an investment of £1,000.00 originally made on the last dealing day of the previous accounting period into the Fund’s primary share class, revalued on the last dealing day for the accounting period that is applicable to this assessment.

⁶Calculated by multiplying the illustrative current value of the £1,000 investment by the Fund’s published OCF at the latest accounting period end date. Note: this figure is provided purely for illustrative purposes only and may not be the actual value charged due to the daily fluctuations in the valuation of the Fund. Investors should also note that the costs and charges represented by the OCF are deducted from the scheme property rather than individual investor accounts and are reflected in the daily published NAV price for the Fund.



⁷The ongoing charges figure is estimated because the share/unit class is relatively new and has insufficient track record for us to calculate it exactly.



ES ALLIANCEBERNSTEIN LOW VOLATILITY GLOBAL EQUITY FUND

● ● ● Quality of Service

We concluded that, based on the areas assessed, the ACD and our key service suppliers/delegates have provided a comprehensive range of services to the Fund and its investors, which are being delivered to a high standard resulting in good value for investors.

● ● ● Performance

Investment Objective <i>Note: The Fund is managed with an aim of achieving its Investment Objective over a rolling 5-year period. There is no guarantee that the Fund will achieve its Investment Objective, and there may be periods of time within the rolling 5 years where the objective is not met.</i>	The investment objective of the fund is to achieve an increase in the value of its investment over a rolling 5-year period after the deduction of all fees, while aiming to have lower volatility than the broad global equity market, as represented by the MSCI World Index and reduce losses when global equity markets decline, through an actively managed, diversified portfolio of shares in global companies.
Target Benchmark	N/A

The objective of the Fund is to increase in value of its investment over a rolling 5-year period after the deduction of all fees. As the Fund was launched in Mar. 2020, by the end of the assessment period, the Fund had less than 4 years performance history, so we instead reviewed the Fund's rolling 3-Year total returns as an indication of performance. We reviewed the total returns recorded at the end of each month during the assessment period and noted that the average of the 12 recorded total returns is 37.4%, which indicates the Fund achieved the investment objective of increase in value of its investment.

The Fund is not managed to target or exceed the performance of any specific benchmark, nor are the Investment Manager's investment decisions constrained by any benchmark. However, we invite investors to compare its performance to a comparator (MSCI World Index) and we utilised the same measurements as we did for the Fund's performance, the average of the 12 recorded total returns of the comparator is 38.5%.

We also take the same measurement of the Fund's 1-year total return and noted that on average, the 1-year total return during the assessment period is 7.6%; where the comparator's total return taking the same measurement during the same period is 8.7%.

The Fund also achieved its objective by showing lower volatilities than the MSCI World Index during the assessment period.

To further assist with your assessment of the Fund's value in the recent short term, we have illustrated in below table the return of the Fund, on a single investment of £1,000, over the assessment period. This table also shows you an illustrative impact of the Fund's costs and charges ('OCF') on this return.

	VALUE OF £1,000.00 INVESTMENT ⁵	ILLUSTRATIVE IMPACT OF COSTS AND CHARGES (THE 'OCF') ⁶
I Acc Share Class	£1,076.32	£7.53

We concluded the Fund achieved its investment objective and represented good value for investors

● ● ● Costs

Our assessment noted that the costs charged to the Fund are clearly identifiable and have been applied in-line with agreed rates and as disclosed within the prospectus. We are additionally satisfied that the services associated to each cost have been provided on a competitive basis.

We therefore concluded that based on the activity undertaken and the services provided, the ACD and supplier costs applied to the Fund are fair and reasonable and therefore represented good value for investors.

● ● ● Economies of Scale



The AUM of this Fund was £409m by the end of assessment period. Our assessment concluded that during the assessment period, all available economies of scale were utilised with the resulting cost efficiencies being appropriately passed onto the Fund’s investors.

The Investment Manager has been subsidising the Fund to place a cap of 0.1% over the total service fees, which benefits the investors with competitive OCFs in all share classes.

••• Comparable Market Rates

The table below shows a comparison of the OCF of the primary share class of this Fund with the average OCF of a peer group of similar funds. The OCF of I share class is lower than the average OCF of the peer group; therefore, we have concluded that the Fund costs are reasonable and competitive.

	ONGOING CHARGES FIGURE (OCF)	OCF OF THE PEER GROUP ⁴
I Acc Share Class	0.70%	0.97%

••• Comparable Services

We concluded that there are no comparable services that we offer to investors.

••• Classes of Units

	MINIMUM INITIAL INVESTMENT	ONGOING CHARGES FIGURE (OCF)	INVESTMENT MANAGER FEE
I Share Class	£1,000	0.70%	0.60%
Z Share Class	£20,000,000	0.10%	0.00%

The Fund has 2 share classes offered to investors, where I class is for retail & institutional investors based on the value of their initial investment and Z class is for Institutional investors who has special fee arrangements with the Investment Manager.

Following our review, we have concluded that during the assessment period, all unitholders in this Fund are in the appropriate share classes, and there are no alternative share class available to any unitholders offering similar rights with lower fees.

••• Overall Conclusion

Based on the assessment results of the above 7 criteria, the Board has concluded the Fund does continue to provide overall value to its investors.

⁴ Source – Data extracted from FE Analytics as of February 2024.

⁵ Based on an investment of £1,000.00 originally made on the last dealing day of the previous accounting period into the Fund’s primary share class, revalued on the last dealing day for the accounting period that is applicable to this assessment.

⁶ Calculated by multiplying the illustrative current value of the £1,000 investment by the Fund’s published OCF at the latest accounting period end date. Note: this figure is provided purely for illustrative purposes only and may not be the actual value charged due to the daily fluctuations in the valuation of the Fund. Investors should also note that the costs and charges represented by the OCF are deducted from the scheme property rather than individual investor accounts and are reflected in the daily published NAV price for the Fund.

⁷ The ongoing charges figure is estimated because the share/unit class is relatively new and has insufficient track record for us to calculate it exactly.



ES ALLIANCEBERNSTEIN SUSTAINABLE GLOBAL EQUITY FUND

Quality of Service

We concluded that, based on the areas assessed, the ACD and our key service suppliers/delegates have provided a comprehensive range of services to the Fund and its investors, which are being delivered to a high standard resulting in good value for investors.

Performance

Investment Objective <i>Note: The Fund is managed with an aim of achieving its Investment Objective over a rolling 5-year period. There is no guarantee that the Fund will achieve its Investment Objective, and there may be periods of time within the rolling 5 years where the objective is not met.</i>	The investment objective of the fund is to achieve an increase in the value of its investment over a rolling 5-year period after the deduction of all fees, through an actively managed, diversified portfolio of shares in global companies that the Investment Manager has identified as positively contributing to sustainable investment themes derived from the UN Sustainable Development Goals.
Target Benchmark	N/A

The objective of the Fund is to increase in value of its investment over a rolling 5-year period after the deduction of all fees. As the Fund was launched in Jan. 2022, by the end of the assessment period, the Fund had 2 years performance history, therefore it is considered too soon to provide a fair and appropriate review against its objective measured over 5 years.

To ensure awareness of the Fund's performance during the assessment period, we reviewed the 1-year total returns recorded at the end of each month during the assessment period and noted that the average of the 12 recorded total returns is 3.1%, which indicates the Fund achieved the investment objective of increase in value of its investment.

The Fund is not managed to target or exceed the performance of any specific benchmark, nor are the Investment Manager's investment decisions constrained by any benchmark. However, we invite investors to compare its performance to a comparator (MSCI World Index) and we utilised the same measurements as we did for the Fund's performance, the average of the 12 recorded total returns of the comparator is 8.7%.

To further assist with your assessment of the Fund's value in the recent short term, we have illustrated in below table the return of the Fund, on a single investment of £1,000, over the assessment period. This table also shows you an illustrative impact of the Fund's costs and charges ('OCF') on this return.

	VALUE OF £1,000.00 INVESTMENT ⁵	ILLUSTRATIVE IMPACT OF COSTS AND CHARGES (THE 'OCF') ⁶
I Acc Share Class	£1,031.29	£8.25

Costs

Our assessment noted that the costs charged to the Fund are clearly identifiable and have been applied in-line with agreed rates and as disclosed within the prospectus. We are additionally satisfied that the services associated to each cost have been provided on a competitive basis.

We therefore concluded that based on the activity undertaken and the services provided, the ACD and supplier costs applied to the Fund are fair and reasonable and therefore represented good value for investors.

Economies of Scale

The AUM of this Fund was £409m by the end of assessment period. Our assessment concluded that during the assessment period, all available economies of scale were utilised with the resulting cost efficiencies being appropriately passed onto the Fund's investors.

The Investment Manager has been subsidising the Fund to place a cap of 0.1% over the total service fees, which benefits the investors with competitive OCFs in all share classes.



••• Comparable Market Rates

The table below shows a comparison of the OCF of the primary share class of this Fund with the average OCF of a peer group of similar funds. The OCF of all share classes are lower than the average OCF of the peer group; therefore, we have concluded that the Fund costs are reasonable and competitive.

	ONGOING CHARGES FIGURE (OCF)	OCF OF THE PEER GROUP ⁴
I Acc Share Class	0.80%	0.97%
S Acc Share Class	0.60%	0.86%

••• Comparable Services

We concluded that there are no comparable services that we offer to investors.

••• Classes of Units

	MINIMUM INITIAL INVESTMENT	ONGOING CHARGES FIGURE (OCF)	INVESTMENT MANAGER FEE
I Share Class	£1,000	0.80%	0.70%
S Share Class	£50,000,000	0.60%	0.50%
Z Share Class	£20,000,000	0.10%	0.00%

The Fund has 3 share classes offered to investors, where I class and S class are for retail & institutional investors based on the value of their initial investment, and Z class is for Institutional investors who has special fee arrangements with the Investment Manager.

Following our review, we have concluded that during the assessment period, all unitholders in this Fund are in the appropriate share classes, and there are no alternative share class available to any unitholders offering similar rights with lower fees.

••• Overall Conclusion

Based on the assessment results of the above 7 criteria, the Board has concluded the Fund does continue to provide overall value to its investors.

⁴Source – Data extracted from FE Analytics as of February 2024.

⁵Based on an investment of £1,000.00 originally made on the last dealing day of the previous accounting period into the Fund's primary share class, revalued on the last dealing day for the accounting period that is applicable to this assessment.

⁶Calculated by multiplying the illustrative current value of the £1,000 investment by the Fund's published OCF at the latest accounting period end date. Note: this figure is provided purely for illustrative purposes only and may not be the actual value charged due to the daily fluctuations in the valuation of the Fund. Investors should also note that the costs and charges represented by the OCF are deducted from the scheme property rather than individual investor accounts and are reflected in the daily published NAV price for the Fund.

⁷The ongoing charges figure is estimated because the share/unit class is relatively new and has insufficient track record for us to calculate it exactly.



ES ALLIANCEBERNSTEIN SUSTAINABLE US EQUITY FUND

● ● ● Quality of Service

We concluded that, based on the areas assessed, the ACD and our key service suppliers/delegates have provided a comprehensive range of services to the Fund and its investors, which are being delivered to a high standard resulting in good value for investors.

● ● ● Performance

<p>Investment Objective</p> <p><i>Note: The Fund is managed with an aim of achieving its Investment Objective over a rolling 5-year period. There is no guarantee that the Fund will achieve its Investment Objective, and there may be periods of time within the rolling 5 years where the objective is not met.</i></p>	<p>The investment objective of the Fund is to achieve an increase in the value of its investment over a rolling 5-year period after the deduction of all fees, through an actively managed, diversified portfolio of shares in US companies that the Investment Manager has identified as positively contributing to sustainable investment themes derived from the UN Sustainable Development Goals.</p>
<p>Target Benchmark</p>	<p>N/A</p>

The objective of the Fund is to increase in value of its investment over a rolling 5-year period after the deduction of all fees. As the Fund was launched in Mar. 2020, by the end of the assessment period, the Fund had less than 4 years performance history, so we instead reviewed the Fund's rolling 3-Year total returns as an indication of performance. We reviewed the total returns recorded at the end of each month during the assessment period and noted that the average of the 12 recorded total returns is 33.9%, which indicates the Fund achieved the investment objective of increase in value of its investment.

The Fund is not managed to target or exceed the performance of any specific benchmark, nor are the Investment Manager's investment decisions constrained by any benchmark. However, we invite investors to compare its performance to a comparator (S&P 500) and we utilised the same measurements as we did for the Fund's performance, the average of the 12 recorded total returns of the comparator is 45.4%.

We also take the same measurement of the Fund's 1-year total return and noted that on average, the 1-year total return during the assessment period is 6.3%; where the comparator's total return taking the same measurement during the same period is 9.2%.

To further assist with your assessment of the Fund's value in the recent short term, we have illustrated in below table the return of the Fund, on a single investment of £1,000, over the assessment period. This table also shows you an illustrative impact of the Fund's costs and charges ('OCF') on this return.

	VALUE OF £1,000.00 INVESTMENT ⁵	ILLUSTRATIVE IMPACT OF COSTS AND CHARGES (THE 'OCF') ⁶
I Acc Share Class	£1,063.33	£8.51

In 2023, the market was dominated by FANGS+ stocks, perceived as the immediate beneficiaries of AI, leading to significant multiple expansions. The Fund's underperformed is mainly due to being underweight in these stocks, which comprised only 7% of the portfolio compared to 30% of the index. Healthcare and industrials sectors also detracted from performance due to inventory adjustments post-Covid. Despite this, the portfolio remains fundamentally resilient, trading at reasonable valuations compared to the market, which is distorted by the high valuations of a few key stocks. The portfolio's differentiated approach, focusing on long-term attractive investment opportunities, and sustainability continues to exhibit strong underlying fundamentals.

Therefore, we concluded the Fund achieved its investment objective and represented good value for investors.

● ● ● Costs

Our assessment noted that the costs charged to the Fund are clearly identifiable and have been applied in-line with agreed rates and as disclosed within the prospectus. We are additionally satisfied that the services associated to each cost have been provided on a competitive basis.

We therefore concluded that based on the activity undertaken and the services provided, the ACD and supplier costs applied to the Fund are fair and reasonable and therefore represented good value for investors.



●●● Economies of Scale

The AUM of this Fund was £3.3m by the end of assessment period. Our assessment concluded that during the assessment period, all available economies of scale were utilised with the resulting cost efficiencies being appropriately passed onto the Fund’s investors.

The Investment Manager has been subsidising the Fund to place a cap of 0.1% over the total service fees, which benefits the investors with competitive OCFs in all share classes.

●●● Comparable Market Rates

The table below shows a comparison of the OCF of the primary share class of this Fund with the average OCF of a peer group of similar funds. The OCF of I share class is the same as the average OCF of the peer group; the OCF of E share class and S share class are lower than the average OCF of the peer group therefore, we have concluded that the Fund costs are reasonable and competitive.

	ONGOING CHARGES FIGURE (OCF)	OCF OF THE PEER GROUP ⁴
I Acc Share Class	0.80%	0.80%
E Acc Share Class	0.55%	0.93%
S Acc Share Class	0.60%	0.65%

●●● Comparable Services

We concluded that there are no comparable services that we offer to investors.

●●● Classes of Units

	MINIMUM INITIAL INVESTMENT	ONGOING CHARGES FIGURE (OCF)	INVESTMENT MANAGER FEE
I Share Class	£1,000	0.85%	0.75%
E Share Class	£5,000,000	0.55%	0.45%
S Share Class	£50,000,000	0.56%	0.50%
Z Share Class	£20,000,000	0.10%	0.00%

The Fund has 4 share classes offered to investors, where I class and S class are for retail & institutional investors based on the value of their initial investment, E class is closed to new investors and Z class is for Institutional investors who has special fee arrangements with the Investment Manager.

Following our review, we have concluded that during the assessment period, all unitholders in this Fund are in the appropriate share classes, and there are no alternative share class available to any unitholders offering similar rights with lower fees.

●●● Overall Conclusion

Based on the assessment results of the above 7 criteria, the Board has concluded the Fund does continue to provide overall value to its investors.

⁴ Source – Data extracted from FE Analytics as of February 2024.

⁵ Based on an investment of £1,000.00 originally made on the last dealing day of the previous accounting period into the Fund’s primary share class, revalued on the last dealing day for the accounting period that is applicable to this assessment.



⁶ Calculated by multiplying the illustrative current value of the £1,000 investment by the Fund's published OCF at the latest accounting period end date. Note: this figure is provided purely for illustrative purposes only and may not be the actual value charged due to the daily fluctuations in the valuation of the Fund. Investors should also note that the costs and charges represented by the OCF are deducted from the scheme property rather than individual investor accounts and are reflected in the daily published NAV price for the Fund.

⁷ The ongoing charges figure is estimated because the share/unit class is relatively new and has insufficient track record for us to calculate it exactly.

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