### ₩ TrinityBridge

# Funds Costs and charges disclosure

#### Introduction

This document seeks to summarise, in a readily understandable format, details of the cost and charges that may be incurred by investors as a result of holding an investment in one of TrinityBridge's authorised funds.

#### Background and market context

Where investors use funds to invest in financial markets, there will be a number of different costs and charges, including entry and exit charges, ongoing charges (such as the investment managers' annual management charge and other fund running costs), transaction costs and one-off costs (such as performance fees). As not all funds will bear all these costs and charges and, given they will vary greatly between different funds, understanding the nature of the costs and charges that may impact on investment returns is an important part of the client's investment decision-making process.

Whilst regulatory enhancements to reporting requirements have sought to ensure that there is greater transparency and more detail provided to investors (with the aim of improving an investor's understanding of the nature of charges and costs), there is not yet total harmonisation across the different regulatory regimes that apply. The result is that there can be a confusing number of differing published sets of costs and charges disclosures for any one underlying fund.

This document seeks to build on the latest regulations on the disclosure of costs and charges (known as MiFID II) and the FCA's expectations arising from their various reviews of the subject. In preparing this summary document we have also sought to adopt the recommended best practice of our industry body, the Investment Association (the 'IA').

# The types of Cost and Charges that can apply to investment in a UK authorised fund structure

There are three basic categories of costs and charges that may apply when investing in a UK authorised fund:

A. One-off charges deducted before or after you invest

- B. Charges deducted from a fund during the course of a year
- C. Charges deducted from a fund under specific conditions

Details of the costs and charges that pertain to TrinityBridge's range of funds are set out in more detail below. Please note that not all of the above categories of cost will apply to TrinityBridge's funds (or to individual unit classes within those funds).

### A. One-off charges deducted before or after you invest

#### **Entry charge**

This is the amount that may be deducted before your money is invested and is intended to cover the costs of setting up your investment, and may include payments to your financial adviser or an intermediary through which you have invested. [For example, if you invest  $\pounds100$ , an entry charge of 5% means that only  $\pounds95$  will be used to buy units in a fund.]

However, please note that TrinityBridge's funds range includes mainstream 'clean fee' units (X class) where no entry charge is applicable, and it is these units that are offered to retail investors.

In some of TrinityBridge's funds unit classes may exist which do have an entry charge but these are either no longer available for new investment (A units) or are intended to be internal to TrinityBridge (I units).

#### Exit charge

This is the amount that might be deducted before the proceeds of the disposal of your investment are paid out to you.

TrinityBridge does not have any exit charges payable on any unit classes in any of its funds.

## B. Charges deducted from a fund during the course of a year

#### 1. Ongoing costs and charges

This category covers all the key costs and charges incurred in operating a fund during the course of a year. For TrinityBridge funds there are three main components that make up these numbers:

#### a. Fund Management Fee ('FMF')

Unlike many of our industry peers, TrinityBridge charges its funds an 'all-in' Fund Management Fee ('FMF') that covers the vast majority of the operating costs of a fund, such as investment management and fund administration, as well as third party costs for outsourced services such as trustee and depositary costs, custody charges, transfer agency costs, fund accounting, audit costs and tax reporting.

Many of our peers charge funds an Annual Management Charge, with the third party costs listed above being levied directly against the fund. TrinityBridge believes that the FMF basis of charging gives investors greater clarity and certainty over the costs and charges that will be borne by a fund, and therefore the potential impact on investor returns.

#### b. Synthetic costs

Where a TrinityBridge fund invests in other funds (such as in our Managed or Tactical Select Passive fund ranges) we 'look through' to the underlying funds and collate and report details of all the equivalent ongoing costs and charges listed above. These look through costs are referred to as 'synthetic costs' (as they are not an actual direct cash cost to the TrinityBridge fund).

#### c. Other expenses

In TrinityBridge's case there are only three elements of costs that sit in this category and which might be charged directly to one of our funds: Hedging Costs, Interest Costs and Securities Lending Fees. Currently, currency hedging is employed in a small number of TrinityBridge's 'Portfolio' funds, whilst interest costs on short term overdrafts may occasionally be incurred more generally across our fund range, although we do not use gearing for investment purposes. TrinityBridge does not currently utilise securities lending in its funds. The level of 'other expenses' in TrinityBridge's funds is minimal.

#### 2. Portfolio transaction costs

Primarily, these charges relate to the cost of buying and selling the underlying investments held within a fund. Transaction costs vary depending on the types of investment in which a fund invests, and by country.

In the case of any underlying transactions in shares, these costs – which may include broker commissions, transfer taxes (i.e. stamp duty) and other related fees – are charged directly to the fund. These are often referred to as Explicit Transaction Costs.

In addition, there is often a 'dealing spread' between the buying and selling prices of any underlying investments (be they shares, bonds or money market instruments), and these costs can vary considerably. These charges are not an actual discrete cost paid by the fund but are a theoretical, 'implied' cost (or, more correctly, an 'Implicit Transaction Cost'). The calculation of these costs is prescribed by regulation and based on the differential between the mid-market price of an asset immediately before a trade is placed in the market and the price that the deal is actually struck at.

Taken together, the (actual) Explicit Transaction Costs and the (theoretical) Implicit Transaction Costs detailed above are often referred to as 'Slippage Costs', and both are included in our reported Portfolio Transaction Costs.

There is also a further element – a Dilution Adjustment – which is taken into account when calculating an individual fund's portfolio transaction cost disclosures, as a significant proportion of the above-mentioned costs are recovered directly from investors when they join and leave the fund. The purpose of this adjustment to the unit price of a fund is to protect existing investors from the costs of buying or selling underlying investments following either large purchases or sales of units in the fund itself by new investors or those exiting the fund. The amount of any such Dilution Adjustment is calculated by reference to the estimated costs of dealing in the underlying investments. TrinityBridge's funds employ what is referred to as 'single swing pricing' (our Fund Prospectuses contain more detail). In addition to all of the above, there is one final element which forms part of the overall portfolio transaction costs disclosure calculation. Where a TrinityBridge fund invests in other underlying funds we look through to the underlying funds and collate details of all the equivalent transaction costs listed above and add them in to derive a total portfolio transaction costs figure for each of our funds. These look through costs are referred to as 'synthetic transaction costs' (as they are not an actual direct cash cost to the TrinityBridge fund).

While prescribed by the regulations, the portfolio transaction costs stated in any costs and charges disclosures are based on a rolling three year average, and may not be a particularly effective guide to their future impact. For TrinityBridge's funds the portfolio transaction costs form a relatively small proportion of a fund's total costs and charges. Comparing portfolio transaction costs for different funds may give a false impression of the relative costs of investing in them.

### C. Charges deducted from a fund under certain specific conditions

These types of charge are referred to as 'incidental costs' as they may not occur on a regular basis and are variable in nature. The most typical costs that will fall in this category are performance-related fees which may be calculated as a percentage of the 'out-performance' of a particular fund as compared to a predetermined benchmark or target.

None of TrinityBridge's fund range contains any performance fee element.

Where a TrinityBridge fund itself invests in other funds, it is possible that, on occasion, the underlying fund may have its own performance fee arrangements. In these circumstances, TrinityBridge will collate details of any such costs and will include them in our total incidental costs disclosure. These look through costs are referred to as 'synthetic incidental costs' (as they are not an actual direct cash cost to the TrinityBridge fund).

As prescribed by the regulations, incidental performance fee cost disclosures are based on the average of five years' data, so may not be a particularly effective guide to their future impact on investor returns.

#### Overview

Whilst the detail of how cost and charges disclosures for TrinityBridge's Funds are derived and displayed is undoubtedly complicated, we have sought to explain what this all actually means for investors in terms of the effect of costs and charges on potential investor returns.

A summary of the MiFID II costs and charges data relating to our Fund range is set out in the attached Appendix.

Further information on our findings can be found in the Assessment of Value Report on our funds range (published annually) and which can be found on the TrinityBridge website **trinitybridge.com/funds/assessment-of-value-report/** 

TrinityBridge is a trading name of TrinityBridge Limited (registered in England and Wales under company number 01644127) and TrinityBridge Fund Management Limited (registered in England and Wales under company number 02998803). Both companies are authorised and regulated by the Financial Conduct Authority. Registered office: Wigmore Yard, 42 Wigmore Street, London, W1U 2RY.

### Appendix

#### TrinityBridge Funds

Costs and Charges Summary - May 2025

							MiFIC	MiFID II Basis				
			One-Off Charges	Charges	Ongoi	Ongoing Costs & Charges	arges	Totol Oncoinc		Incidental		
NISI	Fund Name	Unit Class	Entry Costs **	Exit Costs	* HMH	Synthetic Costs (open ended funds)	Other expenses (e.g. Hedging and borrowing costs)	rocar Ongoing Costs & Charges (excl closed ended funds) - see note***	Portfolo Transaction Costs	incidential Costs (e.g. look-through performance fees) (Synthetic)	Total Costs & Charges (excl. entry/exit charges)	& Chardes & Charges (incl. entry/exit charges)
					a	*** q	U	(a+b+c)	q	e	(a to e)	
GB00BD6R7Y87	TrinityBridge Select Fixed Income Fund	X Income	0.00%	0.00%	0.45%	0.00%	0.01%	0.46%	0.12%	0.00%	0.58%	0.58%
GB00BD6DSC14	TrinityBridge Select Fixed Income Fund	X Accumulation	0.00%	0.00%	0.48%	0.00%	0.01%	0.49%	0.12%	0.00%	0.61%	0.61%
GB00BS6WK382	TrinityBridge Select Fixed Income Fund	S Accumulation <sup>†</sup>	10.00%	0.00%	0.35%	0.00%	0.01%	0.36%	0.12%	0.00%	0.48%	10.48%
GB00BS6WK275	TrinityBridge Select Fixed Income Fund	S Income <sup>†</sup>	10.00%	0.00%	0.35%	0.00%	0.00%	0.35%	0.12%	0.00%	0.47%	10.47%
GB00B7W45Q93	TrinityBridge Select Fixed Income Fund	I Income *	10.00%	0.00%	0.13%	0.00%	0.01%	0.14%	0.12%	0.00%	0.26%	10.26%
GB00B5N0YZ48	TrinityBridge Diversified Income Fund	X Income	0.00%	0.00%	0.72%	0.01%	0.01%	0.74%	0.05%	0.00%	0.79%	0.79%
GB00B708TJ43	TrinityBridge Diversified Income Fund	X Accumulation	0.00%	0.00%	0.71%	0.01%	0.01%	0.73%	0.05%	0.00%	0.78%	0.78%
GB00B4X21294	TrinityBridge Diversified Income Fund	A Accumulation <sup>††</sup>	5.00%	0.00%	1.32%	0.01%	0.01%	1.34%	0.05%	0.00%	1.39%	6.39%
GB00B589Q946	TrinityBridge Diversified Income Fund	A Income <sup>††</sup>	5.00%	0.00%	1.32%	0.01%	0.01%	1.34%	0.05%	0.00%	1.39%	6.39%
GB00BKBDRQ29	TrinityBridge Diversified Income Fund	I Income *	10.00%	0.00%	0.10%	0.01%	0.01%	0.12%	0.05%	0.00%	0.17%	10.17%
GB00B82P0081	TrinityBridge Conservative Portfolio Fund	X Income	0.00%	0.00%	0.88%	0.02%	0.01%	0.91%	0.04%	0.00%	0.95%	0.95%
GB00B8B9ZS46	TrinityBridge Conservative Portfolio Fund	X Accumulation	0.00%	0.00%	0.85%	0.02%	0.01%	0.88%	0.04%	0.00%	0.92%	0.92%
GB00B4RL6Q19	TrinityBridge Conservative Portfolio Fund	A Accumulation <sup>††</sup>	5.00%	0.00%	1.57%	0.02%	0.01%	1.60%	0.04%	0.00%	1.64%	6.64%
GB00B5152B32	TrinityBridge Conservative Portfolio Fund	A Income <sup>††</sup>	5.00%	0.00%	1.57%	0.02%	0.01%	1.60%	0.04%	0.00%	1.64%	6.64%
GB00B7KDKJ66	TrinityBridge Balanced Porfolio Fund	X Accumulation	0.00%	0.00%	0.83%	0.01%	0.00%	0.84%	0.02%	0.00%	0.86%	0.86%
GB00B4YW1S49	TrinityBridge Balanced Porfolio Fund	A Accumulation <sup>††</sup>	5.00%	0.00%	1.57%	0.01%	0.00%	1.58%	0.02%	0.00%	1.60%	6.60%
GB00B80ZCG06	TrinityBridge Balanced Portfolio Fund	I Accumulation *	0.00%	0.00%	0.09%	0.01%	0.00%	0.10%	0.02%	0.00%	0.12%	0.12%
GB00BLPK3Z72	TrinityBridge Sustainable Balanced Porfolio Fund	X Accumulation	0.00%	0.00%	0.83%	0.01%	0.00%	0.84%	0.07%	0.00%	0.91%	0.91%
GB00BLPK3X58	TrnityBridge Sustainable Balanced Porfolio Fund	I Accumulation *	10.00%	0.00%	0.09%	0.01%	0.00%	0.10%	0.07%	0.00%	0.17%	10.17%
GB00B7F1W221	TrinityBridge Growth Portfolio Fund	X Accumulation	0.00%	0.00%	0.86%	0.00%	0.00%	0.86%	0.01%	0.00%	0.87%	0.87%
GB00B4XWGV38	TrinityBridge Growth Portfolio Fund	A Accumulation <sup>††</sup>	5.00%	0.00%	1.58%	0.00%	0.00%	1.58%	0.01%	0.00%	1.59%	6.59%
GB00B7MTYH88	TrinityBridge Select Global Equity Fund	X Accumulation	0.00%	0.00%	0.68%	0.00%	0.00%	0.68%	0.04%	0.00%	0.72%	0.72%
GB00BQXJFK05	TrinityBridge Select Global Equity Fund	I Accumulation *	10.00%	0.00%	0.10 %	0.00%	0.00%	0.10%	0.04%	0.00%	0.14%	10.14%
GB00B8HFR798	TrinityBridge Managed Income Fund	X Income	0.00%	0.00%	0.55%	0.50%	0.00%	1.05%	0.14%	0.00%	1.19%	1.19%
GB00B80PQP76	TrinityBridge Managed Income Fund	X Accumulation	0.00%	0.00%	0.54%	0.50%	0.00%	1.04%	0.14%	0.00%	1.18%	1.18%
GB00B7XQSH60	TrinityBridge Conservative Managed Fund	X Income	0.00%	0.00%	0.53%	0.48%	0.00%	1.01%	0.25%	0.01%	1.27%	1.27%
GB00B45DZX99	TrinityBridge Conservative Managed Fund	X Accumulation	0.00%	0.00%	0.53%	0.48%	0.00%	1.01%	0.25%	0.01%	1.27%	1.27%
GB00B8H6TT84	TrinityBridge Balanced Managed Fund	X Accumulation	0.00%	0.00%	0.52%	0.49%	0.00%	1.01%	0.24%	0.01%	1.26%	1.26%
GB00B815Z375	TrinityBridge Growth Managed Fund	X Accumulation	0.00%	0.00%	0.50%	0.51%	0.00%	1.01%	0.21%	0.01%	1.23%	1.23%
GB00B7FHXB62	TrinityBridge Conservative Tactical Passive Fund	X Income	0.00%	0.00%	0.32%	0.16%	0.00%	0.48%	0.05%	0.00%	0.53%	0.53%
GB00B88TGW85	TrinityBridge Conservative Tactical Passive Fund	X Accumulation	0.00%	0.00%	0.32%	0.16%	0.00%	0.48%	0.05%	%00.0	0.53%	0.53%
GB00B8HS8W08	TrinityBridge Balanced Tactical Passive Fund	X Accumulation	0.00%	0.00%	0.34%	0.16%	0.00%	0.50%	0.05%	0.00%	0.55%	0.55%
GB00BKBDRR36	TrinityBridge Balanced Tactical Passive Fund	I Accumulation *	10.00%	0.00%	0.10%	0.16%	0.00%	0.26%	0.05%	0.00%	0.31%	10.31%
GB00B7SG1Y98	TrinityBridge Growth Tactical Passive Fund	X Accumulation	0.00%	0.00%	0.32%	0.17%	0.00%	0.49%	0.04%	0.00%	0.53%	0.53%
GB00BKBDRS43	TrinityBridge Growth Tactical Passive Fund	I Accumulation *	10.00%	0.00%	0.10%	0.17%	0.00%	0.27%	0.04%	0.00 %	0.31%	10.31%
GB00B87JKQ15	TrinityBridge FTSE techMARK Fund	X Accumulation	0.00%	0.00%	0.67%	0.00%	0.00%	%29.0	0.07%	0.00 %	0.74%	0.74%
* TrinityBridge Inte	TrinityBridge Internal Unit Class only. Beetriched unit class – only available at the Manager's discretion											

Restricted unit class: - only available at the Manager's discretion.
FMF = TrinityBridge's Fund Management Fee, equivalent to the Asset Management Charge but out of which TrinityBridge pays the Trustee, Transfer Agency Costs, Custody Charges, Fund Administration and Accounting, Tax Reporting and Audit Costs of its Funds.
\* These costs are waivable at the Manager's discretion.
\* these costs are waivable at the Manager's discretion.
\* Boosts relate to the synthetic (look-thorough) OCF's of open-ended investments held in the Fund's portfolio. Note: In line with FCA guidance, the synthetic costs of closed ended investment trusts is no longer and the closes are no longer available for new investment, but may still be acquired where a pre-existing long term investment plan is in place.
N.B. Costs shown are on an Ex Ante basis.
The above data is correct as at 1 May 2025, and is based on 30 September 2024 interim accounts figures.