

KEY FEATURES OF THE ETHICAL DISCRETIONARY INVESTMENT MANAGEMENT SERVICE

WHO IS THOMAS MILLER INVESTMENT LTD?

Thomas Miller Investment is the trading name of the businesses in the Thomas Miller Investment Group. Thomas Miller Investment Ltd and Thomas Miller Wealth Management Limited ('Thomas Miller Wealth') are authorised and regulated by the Financial Conduct Authority. Its head office is located at 90 Fenchurch Street in London. Thomas Miller Wealth offers discretionary investment management services primarily to UK based private clients, UK companies and pension schemes through referrals mainly from financial advisers.

Thomas Miller Wealth knows that the service it provides affects the quality of people's lives and it takes this responsibility very seriously, whether it is your personal wealth or a company pension scheme.

If you are a private individual or are acting on behalf of a company, Thomas Miller Wealth has one goal in mind – seeking the best outcome for you.

Thomas Miller Wealth aim to make complex issues clear and understandable, to listen to your needs and deliver what it says it will. Thomas Miller Wealth hopes this key features document helps meet these standards, but if there is anything that you feel has not been adequately explained, please let Thomas Miller Wealth know so that it can provide you or your financial adviser with further information.

WHAT IS DISCRETIONARY INVESTMENT MANAGEMENT?

Many clients do not have the time or inclination to manage their own investments. In a fast-changing world it is difficult to stay ahead of events and ensure that your portfolio of investments is positioned to benefit from current economic, political and social trends.

A discretionary investment management service allows you to delegate responsibility for the day-to-day management of your investments to a professional investment manager. The investment manager has complete discretion (often within agreed limits) to manage and invest your money without referring to you before it deals on your behalf.

The key benefits of discretionary investment management include:

- As a discretionary investment manager does not have to refer each decision to buy or sell an investment to you for approval, investment decisions can be made quickly in response to changing markets and economic conditions.
- You will receive a periodic report from the discretionary investment manager showing the value of your investments in your portfolio and summarising any changes made to the holdings over the reporting period. This ensures that you are kept informed about activity on your portfolio but keeps the amount of paperwork you receive to a minimum
- Discretionary investment managers are regarded as professional investors within the financial services market and can generally access investment products that may not be available to individual 'retail' clients. These institutional investments may have lower charges than the equivalent investments available to retail investors.

As with all investments there are risks. If you are unsure about the risks associated with investing in financial instruments, you should contact your usual financial adviser. When considering whether to use a discretionary investment management service, please remember that:

- By its very nature, a discretionary investment management service requires you to delegate responsibility for the day to day management of your investments to a professional party. This means that, other than by setting investment restrictions on the portfolio, you relinquish the ability to veto decisions to buy or sell investments. Whilst, for many, this is the appeal of a discretionary investment management service, some investors may prefer to retain complete control over their portfolio.
- Discretionary investment managers will make a charge for managing your investments. Typically you might pay an initial charge for setting up your portfolio and then a further annual charge, often based on the value of your portfolio. Some discretionary investment managers may charge a performance fee if your portfolio outperforms an agreed benchmark. Discretionary investment managers may also charge for undertaking transactions on your behalf and you may be asked to meet the costs of closing your portfolio or transferring your investments to a different investment manager or financial adviser. The cost of a discretionary investment management service may be offset where the service allows you access to cheaper 'institutional' investments or where the investment manager's expertise means that your portfolio performs better and makes you more money, but there will be some form of charge for the service.
- There is no guarantee that the returns from a discretionary investment management service will exceed those achieved through alternative investment services or by managing your portfolio yourself.

WHAT IS ETHICAL INVESTMENT?

A client's ethical, moral, religious or social beliefs can influence their choice of investment. Where this is the case, ethical investment may offer a way of investing which does not compromise an investor's principles.

There are various approaches to investing in an ethical manner:

Negative screening

This approach seeks to avoid investments in companies that do not meet certain ethical standards. For example, this type of screening may exclude investments in companies involved with animal testing, arms manufacturing, alcohol or tobacco.

Positive screening

This approach seeks to invest in companies that have a commitment to responsible business practices, products or services. For example, this may be companies whose products are environmentally friendly or that actively support community welfare.

Shareholder influence

This approach uses shareholder pressure to seek to improve a company's ethical, social or environmental behaviour.

Important

Ethical investment can mean different things to different people. Some ethical investors may wish to avoid holding shares in a company that derives revenue from the sale or production of alcohol, whilst others may have no objection to such an investment.

Often decisions about whether investing in a particular company is ethical are not clear cut. For example, oil and gas companies may contribute to emissions of carbon dioxide and greenhouse gases but will also be investing in and developing cleaner energy solutions for the future.

Similarly, investment managers take different approaches to creating an ethical portfolio and ethical funds adopt a variety of different ethical investment objectives. For example, some ethical funds permit investment in oil companies whilst others do not. It is therefore important that you understand the approach being taken by any ethical investment fund or service.

Before investing in Thomas Miller Wealth's Ethical Discretionary Investment Service, please read the next section to ensure that you are happy with the criteria that will be used to construct your portfolio.

THOMAS MILLER WEALTH'S ETHICAL DISCRETIONARY INVESTMENT MANAGEMENT SERVICE

Thomas Miller Wealth's ethical discretionary investment management service is available to clients who have at least £50,000 to invest.

Thomas Miller Wealth's discretionary portfolios are designed for investment over the longer term and are therefore not suitable for clients who only wish to invest for five years or less.

Thomas Miller Wealth's ethical discretionary investment management service does not invest directly in shares or bonds. Rather, Thomas Miller Wealth aims to obtain exposure to such investments through investment in a range of collective investment schemes ("funds"). These funds provide our discretionary clients exposure to a variety of investment types, which may include equities, fixed interest securities, cash and alternative investments (such as property).

Thomas Miller Wealth will aim to construct an ethical portfolio using funds that are classified as 'Ethical' by the Investment Management Association (IMA). These funds have a variety of different investment objectives and may adopt negative, positive and shareholder influence approaches to select appropriate investments. More information about investing in ethical funds can be found on the IMA website www.investinginfunds.org.

To achieve diversification within your portfolio, Thomas Miller Wealth has taken the decision to permit investment in UK commercial property and government debt through funds that do not have ethical mandates. Thomas Miller Wealth's ethical portfolios do not invest in alternative investments (e.g. hedge funds) and commodity funds.

More information about the risks associated with investing in funds can be found in Thomas Miller Wealth's Terms of Business. For ease of reference the relevant information can also be found at the end of this key features document.

Thomas Miller Wealth understands that some clients may wish to include or exclude certain types of investment from their portfolio. If this is the case then Thomas Miller Wealth's ethical discretionary investment management service is unlikely to be suitable for you.

Where appropriate, Thomas Miller Wealth's is able to manage your investments held within a tax efficient wrapper, such as a Self Invested Personal Pension (SIPP), Life Assurance Bond, or Stocks and Shares Individual Savings Account (ISA).

Thomas Miller Wealth will manage your discretionary portfolio in accordance with an investment mandate. Your financial adviser will help you formulate an appropriate mandate to reflect your investment objectives and the level of risk that you are able to take to achieve those objectives. Your financial adviser will provide Thomas Miller Wealth's with confirmation of your attitude to investment risk described in terms of one of Thomas Miller Wealth's risk categories, details of which can be sent to you or your financial adviser on request. More details about investment risks may be found in Thomas Miller Wealth's Terms of Business.

Thomas Miller Wealth will keep your portfolio of investments under review and will make any necessary changes by buying and selling investments on your behalf. Please remember that decisions to buy or sell investments within your portfolio will be made by Thomas Miller Wealth and will not be referred to you for approval. Any changes to your discretionary portfolio will not take account of your personal tax position.

Please remember that neither performance, return, nor income is guaranteed and you might lose money. Also, an ethical portfolio will have a smaller choice of funds in which to invest. Therefore, the portfolio is likely to be more concentrated in fewer funds, potentially increasing portfolio volatility.

HOW DO WE MANAGE YOUR MONEY?

Your money will be invested in a portfolio of assets which broadly mirrors one of Thomas Miller Wealth's model portfolios. Thomas Miller Wealth maintains a series of model portfolios including an ethical portfolio. These theoretical portfolios are designed to seek to achieve an optimal long term return for a given level of investment risk.

The process used by Thomas Miller Wealth to construct its model portfolios can be summarised as follows:

Stage 1 – Asset allocation

Asset allocation refers to the strategy used to determine how much of a portfolio should be invested in each of the various different types of investment, such as equities, fixed interest investments, property, commodities and cash.

For each Thomas Miller Wealth risk category, Thomas Miller Wealth devises an asset allocation designed to seek the best long term returns for the level of investment risk which investors in that risk category are prepared to take.

You should remember that the information you provide your financial adviser will determine their assessment of your attitude to risk upon which Thomas Miller Wealth will rely when making its investment decisions. Therefore, you should ensure that the information you provide is complete and accurate.

Thomas Miller Wealth's ethical portfolio broadly follows the same long term asset allocation as the non-ethical portfolios that contain a similar risk profile. However, modifications are made to reflect the restricted choice of investment funds. For example, Thomas Miller Wealth will normally seek to invest in funds from each specific region but are more likely to select global equity funds within the ethical portfolio.

Although, Thomas Miller Wealth may take tactical positions within the ethical portfolio, it will be more usual for the long term model to be directly followed. This will mean that you are likely to be fully invested at all times and depending on market conditions, this may increase short term risk and volatility.

Stage 2 – Investment selection

Having determined the asset allocation, Thomas Miller Wealth then picks investments that will provide the required exposure to the different types of investment. Thomas Miller Wealth generally uses funds. These are investments where the investor's money is pooled with that of other investors and managed on their behalf by a fund manager.

For the ethical portfolio, Thomas Miller Wealth will generally select from funds that have been classified as 'ethical' by the IMA.

Each ethical fund will have a different set of ethical criteria. Thomas Miller Wealth does not exclude any fund which the IMA has classified as ethical on the basis that it does not meet a particular ethical standard i.e. the fund selection does not involve any additional ethical screening.

In order to offer diversification, Thomas Miller Wealth may use some funds that are not classified as 'ethical' by the IMA. For example, mainstream funds in the areas of UK commercial property and government debt will be considered.

Although Thomas Miller Wealth does not overlay its own ethical investment criteria, through its due diligence process it aims to select fund managers whom it believes have robust systems and controls, along with a demonstrable track record and competitive charges.

Because there are a limited number of ethical funds to choose from, an ethical portfolio may contain fewer different funds or funds from a smaller range of providers than its non-ethical equivalent. This is known as concentration risk. A Thomas Miller Wealth ethical portfolio is likely to contain greater concentration risk than its nonethical equivalent.

Thomas Miller Wealth uses a mixture of active funds and passive funds. Active funds have a fund manager who makes decisions to buy and sell investments in order to seek to outperform a pre-determined benchmark. Through Thomas Miller Wealth's due diligence process it aims to select fund managers whom it believes will add value for the fee that they are taking from the fund.

Passive funds aim to track a pre-determined benchmark. They are usually a lower cost way of gaining exposure to a particular investment type. For example, Thomas Miller Wealth may use a passive fund that tracks the FTSE4Good UK index to provide exposure to UK equities.

Stage 3 – Ongoing review

Both Thomas Miller Wealth's asset allocations and investment selections are reviewed on a regular basis to ensure that its model portfolios take account of changes in markets and economic conditions, remain relevant and perform as expected.

Please be aware that Thomas Miller Wealth's model portfolios are used as a guide for managing your discretionary portfolio. Although your portfolio is monitored and kept broadly in line with the appropriate model, it may not always be identical in composition.

WHO HOLDS MY INVESTMENTS AND CASH?

The assets within your discretionary portfolio will not be held by Thomas Miller Wealth. Instead, Thomas Miller Wealth will introduce you to a third party custodian, SEI Investments (Europe) Limited ("SEI"), who will be responsible for the safe keeping of your investments and cash.

Thomas Miller Wealth, as your agent, will enter into an agreement with SEI, on your behalf. Under this arrangement you will remain a client of Thomas Miller Wealth's but you will also become a client of SEI for the provision of safe custody and associated services.

Full details of the terms on which SEI will provide you with custody and associated services can be found in Thomas Miller Wealth's Terms of Business.

Please be aware that money held by SEI may be pooled with money belonging to the custodian's other clients which means that you will not have a claim against a specific sum in a specific account; rather your claim is against the client money pool in general. Similarly investments or other assets may be held in an omnibus account or may be otherwise pooled with assets belonging to the custodian's other clients. Accordingly, your individual entitlements may not be identifiable by separate certificates, physical documents or equivalent electronic entries on the register of shareholders/unit holders.

As a result of the pooling described above, in the event of an irreconcilable shortfall in assets or monies held by SEI, you may suffer a share of this shortfall i.e. you may lose a proportion of your assets or money.

To enable Thomas Miller Wealth to buy and sell assets within your discretionary portfolio you will need to authorise it to deal with SEI on your behalf. Your authority will enable Thomas Miller Wealth to instruct SEI to execute and settle transactions or transfer assets or money in respect of your discretionary portfolio. Again, please refer to Thomas Miller Wealth's Terms of Business for full details.

Please note that SEI will only accept instructions concerning your assets or money from Thomas Miller Wealth and not directly from you.

HOW DO I BECOME A DISCRETIONARY CLIENT?

Your financial adviser will be able to provide you with a copy of Thomas Miller Wealth's Terms of Business, an engagement letter and a discretionary investment mandate to complete.

Your financial adviser will help you complete the mandate to reflect your investment objectives and attitude to risk.

If you are not already a client of Thomas Miller Wealth, Thomas Miller Wealth will need to verify your identity in order to meet its obligations under anti-money laundering legislation.

If you are happy to proceed, simply sign and return the engagement letter and completed mandate and Thomas Miller Wealth will make the necessary arrangements to start managing your portfolio.

HOW DO I FUND MY DISCRETIONARY PORTFOLIO?

You can fund your discretionary portfolio in cash by electronic transfer to a cash account set up for you by the custodian, SEI.

If your discretionary portfolio is funded from the sale of existing investments there will be a period where you will be invested in cash. During this period, which could extend to several weeks, you will not benefit from any increase in the value of the investments that you would have otherwise held, but equally you will not suffer from any fall in value. This is referred to as "out of market" risk.

Where you fund your discretionary portfolio in cash, Thomas Miller Wealth may not invest all of your money at once. Instead it may drip-feed your money into investments over several months. This 'phasing-in' is designed to smooth out the effect of market changes on the value of your portfolio and reduce the risk of entering the market at the wrong time. However, please bear in mind that during the phasing-in period your portfolio will have a higher proportion of cash and so will there will be an associated "out of market" risk.

You may also be able to transfer existing funds held by you into your discretionary portfolio, but this will only be possible where the custodian, SEI, is able to accept such transfers. Thomas Miller Wealth is unable to accept transfers of direct securities such as shares and fixed interest securities.

CAN I TAKE AN INCOME FROM MY PORTFOLIO?

Yes. Thomas Miller Wealth can pay an income from the portfolio to a level you select. This can be paid out monthly, quarterly or half yearly as specified by you.

The amount of income from the investments within your portfolio can fluctuate and is not guaranteed. If you have opted for a fixed withdrawal from your portfolio, where there is insufficient investment income or growth to pay the required withdrawal, it will be taken from invested capital and this could cause an erosion of the capital value.

CAN I WITHDRAW MONEY FROM MY PORTFOLIO?

Yes. You can make ad-hoc withdrawals from your discretionary portfolio at any time. Where Thomas Miller Wealth needs to sell investments within your portfolio to raise the necessary cash, the process can take several weeks.

Should you wish to make a withdrawal, please contact your financial adviser in the first instance as there may be financial planning or tax implications. Your financial adviser will forward your instruction to us.

If you decide that you require access to your money in the early years, there is an increased risk that you may receive back less than the amount you invested.

WHAT IS MY CUSTOMER CATEGORY?

So that Thomas Miller Wealth can treat its clients according to their knowledge and experience of investments, Thomas Miller Wealth's regulator, the Financial Conduct Authority, requires Thomas Miller Wealth to put its clients into one of the following three categories:

- Retail client;
- Professional client;
- Eligible counterparty.

Retail clients are afforded the highest level of protection under the regulations and receive full information about the services that Thomas Miller Wealth provides.

Your customer classification will be stated in the engagement letter.

HOW MUCH DOES THE SERVICE COST?

Initial fee

Thomas Miller Wealth does not normally charge a fee for establishing your discretionary portfolio.

Ongoing fee

For the ongoing management of your portfolio, Thomas Miller Wealth's standard charge is 0.85% of the value of your portfolio per year plus VAT, where applicable.

So for a portfolio worth £200,000 Thomas Miller Wealth will charge £1,700 per year + VAT.

A proportion of the annual fee is deducted monthly from your account at SEI. The amount deducted is calculated using the average value of your portfolio throughout the month.

For as long as you receive discretionary investment management services from Thomas Miller Wealth, the costs and expenses of using SEI as your custodian will be met by Thomas Miller Wealth's ongoing fee.

Portfolio closure fee

Having notified us that you no longer wish Thomas Miller Wealth to manage your discretionary portfolio, Thomas Miller Wealth may, at its discretion, alter the basis of remuneration to an administration fee (typically of 0.25% per annum of the value of your portfolio).

You may need Thomas Miller Wealth to arrange for your investments to be transferred to a third party or reregistered in your name.

Thomas Miller Wealth may, at its sole discretion, charge a fee of £30 per investment to arrange such transfers. Where a holding cannot be transferred and so has to be redeemed, Thomas Miller Wealth may, at its sole discretion, make a transaction charge of up to £10 per transaction.

Fund Managers Charges

Please remember that each of the funds in which your discretionary portfolio invests bears its own annual operating costs.

Your Financial Adviser's Charge

Please be aware that your financial adviser may also charge for the services they are providing to you. Your financial adviser will provide you with more details of their charges and agree with you the amount payable and how it is to be paid. Subject to your agreement, Thomas Miller Wealth may be able to facilitate the payment of your financial adviser's charge by making deductions from your investment portfolio.

Commission

Thomas Miller Wealth may, to the extent permitted by the Financial Conduct Authority's rules, elect to receive commission from fund managers.

Thomas Miller Wealth may, to the extent permitted by the Financial Conduct Authority's rules and as agreed with you, retain any commission received in full or partial settlement of its fees for investment services or otherwise arrange the payment of such commissions to an account nominated by you.

Commission payments which are used to settle Thomas Miller Wealth's fees or are rebated to you may be subject to income tax and may need to be disclosed by you to HM Revenue & Customs.

HOW DO YOU KEEP ME INFORMED?

Unless otherwise agreed with you, Thomas Miller Wealth will send you statements setting out the value and composition of your discretionary portfolio on a six-monthly basis (as at each 31 March and 30 September). Please let Thomas Miller Wealth know if you would rather receive a quarterly statement.

Thomas Miller Wealth does not manage portfolios to beat a particular benchmark. However, your statement will include a number of benchmarks to enable you to judge the relative performance of your portfolio over a particular period. Ultimately you need performance that enables you to achieve your goals.

Unless otherwise agreed with you, Thomas Miller Wealth will not provide you with information about the purchase and sale of investments within your portfolio on a transaction-by-transaction basis, but details of all acquisitions and disposals will be set out in your six monthly statement.

On an annual basis, Thomas Miller Wealth will provide you with a Client Information Pack which will include consolidated tax vouchers and for non pension portfolios, a report on acquisitions and disposals. Client Information Packs can be forwarded, on your request, to your tax adviser to assist with completion of your tax return and to your financial adviser.

WHAT IF MY CIRCUMSTANCES CHANGE?

Thomas Miller Wealth recognises that your investment objectives, financial circumstances and attitude to investment risk may change from time to time. As a consequence you may wish to instruct Thomas Miller Wealth to change the way it manages your discretionary portfolio to ensure that it continues to meet your needs. Thomas Miller Wealth does not provide its clients with financial planning advice. If your circumstances have changed, please notify your financial adviser promptly of any such changes, so that they can help decide whether to make changes to your discretionary mandate. Once Thomas Miller Wealth has received your revised mandate it will begin making the necessary changes to your discretionary portfolio.

Please note that it may not always be in your best interests to alter the composition of your discretionary portfolio immediately on receipt of your new mandate. For example the immediate sale of a higher risk investment at a comparatively low price to finance the purchase of a lower risk investment might not be advisable where the value of that higher risk investment is expected to rise. As such, you may wish Thomas Miller Wealth to make the changes to your discretionary portfolio over a period of time. However, a more gradual change to your portfolio has its own risks. Using the example above, by continuing to hold the higher risk investment, you face the risk that its value will fall further. Your financial adviser will be able to advise you as to the best approach to managing the transition; inform you of the associated risks; and help you provide appropriate instructions to Thomas Miller Wealth.

WHAT HAPPENS TO MY PORTFOLIO ON MY DEATH?

Upon notification of your death, Thomas Miller Wealth will cease to manage your portfolio actively and its authority to buy and sell investments (except to the extent required to complete transactions outstanding at the date of notification) will be suspended until it receives instructions from your personal representatives.

Your personal representatives or executors will need to provide Thomas Miller Wealth with a certified copy of your Death Certificate and the Grant of Probate or Letters of Administration. These must be accompanied by the relevant identity information in respect of each personal representative or executor.

Once Thomas Miller Wealth has received these documents, it will be able to act on instructions from your personal representatives or executors either to sell the investments in your portfolio or re-register them into the names of the executors or administrators of your estate or a beneficiary under your will.

WHAT IF I'M UNHAPPY WITH THE SERVICE?

Customer satisfaction is important to Thomas Miller Wealth. If you are unhappy with the service, please write to:

The Compliance Officer
Thomas Miller Wealth Management Limited
90 Fenchurch Street
London EC3M 4ST

If you are not satisfied with the response, you may be able to refer your complaint to:

The Financial Ombudsman Service
South Quay Plaza
183 Marsh Wall
London E14 9SR
www.financial-ombudsman.org.uk

WHAT IF I NO LONGER WANT THOMAS MILLER WEALTH TO MANAGE MY PORTFOLIO?

You may terminate your discretionary investment management agreement with Thomas Miller Wealth at any time by written notice. Upon receipt of your notification, Thomas Miller Wealth will cease to manage your portfolio and its authority to buy and sell investments on your behalf will also cease (except to the extent required to complete transactions already initiated and to arrange an orderly sale or transfer of your investments on your instructions).

Please note that if you terminate Thomas Miller Wealth's appointment, the appointment of SEI as custodian will simultaneously terminate on the same date.

You may be able to re-register your investments to a custodian of your choosing or one appointed by your new investment manager or adviser. However, this will depend on the replacement custodian's investment range. You will need to provide Thomas Miller Wealth with details of where to transfer your investments within 30 days of your notice to terminate.

APPENDIX 1 – RISKS

Investment Risk

The value of investments may go down as well as up and is not guaranteed. If you have to sell your investments at a time when markets and prices are depressed, you may receive back less than you originally invested. Therefore, generally investment should be regarded as a medium to long term commitment and you should be willing to accept some risk to your capital and not invest monies that you may require in the short term.

In recent times, liquidity in the financial markets has become severely restricted, causing a number of firms to withdraw from the market, or in some extreme cases, become insolvent. Severe market events of this nature could have an adverse effect on Thomas Miller Wealth's ability to achieve your investment objectives.

Key risks relating to Collective Investment Schemes

Your discretionary portfolio will be invested primarily in a range of collective investment schemes ("funds"). Whilst these funds will invest in underlying assets which will be subject to the other risks described here, there are also specific risks associated with investing in funds. Therefore, one of the key risks involved in Thomas Miller Wealth's investment strategy is the investment in funds.

These risks include the risk of a loss that could result from the insolvency, negligence or fraudulent action of the fund's custodian or subcustodian. Loss could also arise as a result of the negligence, wilful default or fraud of the manager and/or investment adviser of the fund. In addition, loss may arise where the manager of the fund has taken substantial positions in one security or group of securities or sector or asset class which may make the fund more likely to be adversely impacted and its valuation fluctuate more markedly in the event of market influences affecting that security, group of securities, sector or asset class.

Where the fund invests in a specific sector or asset class, the performance of the fund will be dependent on the performance of that specific sector or asset class rather than the wider financial market and therefore the fund is more likely to be adversely affected by market influences on that sector or asset class.

Certain funds may be listed. The price of their shares will depend on supply and demand and may not reflect the value of the underlying assets. It may be higher ("at a premium") or lower ("at a discount"). The discount or premium will vary over time.

Open-ended funds may have restrictions on the number of shares that can be redeemed on a dealing day and there may be occasions when redemptions are suspended. Accordingly, you may not be able to achieve the prevailing underlying net asset value if you wish to sell your holding.

In addition, funds bear their own operating costs. These are typically reflected in the share price and, depending on the value of funds under management of the fund, may have an adverse effect on its price.

Certain funds may be unregulated in the UK (including hedge funds). Investment in unregulated funds carries additional risk as these funds may not be under the regulation of a competent regulatory authority, may use gearing and may carry increased liquidity risk as units/shares in such funds may not be readily realisable.

Thomas Miller Wealth may invest into fund of hedge funds, including those that have exposure to alternative investments, such as commodities, and that can employ a wide range of investment styles and techniques, each of which carries different levels of risk from highly speculative short selling arrangements through to sophisticated trading strategies with the aim of delivering returns in a less volatile way. They may use borrowing and derivatives which carry a higher risk of loss, where a relatively small price movement may result in substantial loss to the fund.

Manager Risk

You will have an exposure to finance sector companies, as service provider or as counterparty to financial contracts such as where Thomas Miller Wealth uses the services of a third party in the course of providing its Services to you or where it refers you to a third party for the provision of services by that third party. In recent times, liquidity in the financial markets has become restricted, causing a number of firms to withdraw from the market, or in some extreme cases, become insolvent. Severe market events of this nature could have an adverse effect on Thomas Miller Wealth's activities.

Counterparty and Credit Risk

You may suffer a loss due to another party not meeting its financial obligations. One source of this risk is where counterparties with which Thomas Miller Wealth has executed a transaction on your behalf fail to meet their transaction commitments.

In addition, some of the issuers of securities may become less financially secure and this could reduce the value of the security and hence the value of your Portfolio.

Where your money is held with a financial institution which becomes insolvent or suffers other financial difficulties you may not get back the full deposit. Retail clients may be eligible to claim under the UK's Financial Services Compensation Scheme for monies on deposit with defaulting deposit takers.

Funds that invest in shares

If there is no recognised market for shares these may be difficult to realise and accurate information about their value may be difficult to obtain.

Smaller companies can be subject to certain specific risks not normally associated with larger, more mature companies. These risks relate mainly to lack of product depth, limited geographical diversification and greater sensitivity to economic conditions. Companies trading on the Alternative Investment Market or PLUS are by their nature smaller companies and there is a less liquid market in their securities than may be the case for companies listed on the Official List of the UK Listing Authority. The securities of smaller companies may be subject to greater fluctuations in value.

Emerging market securities involves certain risks and special considerations not typically associated with investing in more established economies. Such risks may include the risk of nationalisation or expropriation of assets or confiscatory taxation; social, economic and political uncertainty, including war; less liquidity of the financial markets; more volatile currency exchange rate fluctuations; potentially higher rates of inflation (including hyperinflation); controls on investment into the country and/or restrictions on repatriation of invested capital; a higher degree of governmental involvement in and control over the economy; differences in auditing and financial reporting standards, which may result in the unavailability of material information about economies and issuers; less extensive or no regulatory oversight of the financial sector; longer settlement periods for securities transactions and less stringent laws regarding the protection of investors.

As a result, changes in the value of investment may be more unpredictable and the impact of extreme market events greater than in developed nations.

Funds that invest in fixed interest investments

Debt securities are subject to both actual and perceived measures of creditworthiness. The amount of credit risk is measured by the issuer's credit rating assigned by one or more independent credit rating agencies. This does not amount to a guarantee of the issuer's creditworthiness but is a strong indicator of the likelihood of default. Securities which have a lower credit rating are generally considered to have a higher credit risk and a greater risk of default than more highly rated securities.

Companies often issue securities ranked in order of seniority which, in the event of default, would be reflected in the priority in which investors might be paid back. The "downgrading" of a rated debt security by adverse publicity and investor perception, not necessarily based on fundamental analysis, could decrease the value and liquidity of the security, particularly in a thinly traded market.

Non-investment grade debt may be highly geared and carry a greater risk of default. In addition, non-investment grade debt securities tend to be more volatile than higher rated fixed-income securities.

Prices of shorter-term fixed income securities tend to fluctuate less in response to interest rate changes than longer-term securities. An economic recession may adversely affect an issuer's financial condition and the market value of its high yield debt securities.

Emerging market debt securities may be rated in the lower rating categories by the various credit rating agencies and may be subject to greater risk of loss of principal and interest than higher-rated securities. These securities are generally considered predominantly speculative with respect to the issuer's capacity to repay interest and repay principal. These are also generally subject to greater risk than securities with higher credit ratings in the event of a deterioration of general economic conditions. Additionally, evaluating credit risk for emerging market debt securities involves uncertainty because credit rating agencies worldwide have different standards making comparisons between countries difficult. The market for emerging market debt securities is thinner and less active than that for higher rated securities which can adversely affect the prices at which securities are bought and sold.

In addition, adverse publicity and investor perceptions about emerging market debt securities, whether or not based on fundamental analysis, may be contributing factors in a decrease in the value and liquidity of such securities.

Funds that invest in derivatives

Derivatives are investments which derive their value from the value of an underlying asset, reference rate or index, but the nature of the derivative may alter the nature of that exposure to the relevant underlying asset, reference rate or index. Therefore, derivatives involve risks different from, and in some cases greater than, more traditional investments. The value of these investments may fluctuate significantly.

Transactions in over-the-counter instruments may involve additional risk as there is no exchange market on which to close out an open position. It may be impossible to liquidate an existing position, to assess the value of a position or to assess the exposure to risk. Trading options entails the risk of the option's value changing over time. However, unlike traditional securities, the return from a derivative may vary non-linearly with the value of the underlying asset, reference rate or index.

Funds that invest in commodities

Investment in commodities involves the risk of uncertainties of future market values caused by the fluctuation in the prices of commodities. Types of commodities include grains, metals, gas and electricity.

Funds that invest in property

Certain funds may invest in property related securities and/or investments with exposure to real property and/or real property ("property funds"). The value of capital and income will fluctuate as property values and rental incomes rise and fall. Since the underlying investments in property funds may consist wholly or substantially of real property, under certain market conditions investors seeking to redeem their holdings may experience significant delays. Further, the value of the real property concerned will generally be a matter of the valuer's opinion rather than fact and may fluctuate up or down.

Currency Risk

Where a fund or its underlying investments are denominated in a non-Sterling currency, a movement of exchange rates may have a separate unfavourable as well as favourable effect on the gain or loss otherwise experienced by the investment.

Settlement Risk

Practices in relation to settlement of securities transactions in certain markets may involve higher risk than those in developed markets. Delays in settlement could result in investment opportunities being missed if Thomas Miller Wealth is unable to acquire or dispose of a security.

Volatility of Risk Return

The return on investments in the form of interest and dividends may go down as well as up. For example, a company may decide to reduce or stop making dividend payments or, in extreme financial conditions, may fail to pay interest to the holders of its debt.