

# Notice of Changes to SPW Portfolio Funds

Revision of the composite benchmarks  
Adoption of the SPW Responsible Investment Policy  
Revision of the Fund Charging Structure

27<sup>th</sup> May 2025

## Changes to the Composite Benchmarks of the SPW Portfolio Funds

### What are we doing?

We are changing the composite benchmarks for the SPW Portfolio Funds as set out in Appendix 1 below.

### Why are we doing it?

The changes follow the review of the ACD's Strategic Asset Allocation Models ('SAA'). These models represent the ACD's view of the allocations to assets that should achieve the best risk adjusted returns for investors over the long term. Allocation models are developed for differing levels of investment risk. The revised composite benchmarks also reflect increased granularity in bond allocations and the removal of alternative asset classes (real estate and commodities). The changes in turn require a slight adjustment to investment limits on two funds (detailed in the appendix).

The ACD aims to review the SAA annually. Allocations can change, however, given its long term outlook, material revisions would not be expected occur frequently.

### When will it happen?

The change to the composite benchmarks will take place on 1<sup>st</sup> August 2025.

### Will the Portfolio Funds' Investment Objectives and Policies change?

Yes. The Investment Objectives will change to reflect the revised composite benchmarks.

Other than in relation to the adoption of a new Responsible Investment Policy as discussed below, the Investment Policies will change only in relation to the SPW Cautious Portfolio to adjust the maximum level of investment in equities and equity related securities in the Fund from 30% to 35% and in relation to the SPW Adventurous Portfolio to reduce the amount investable in sub-investment grade bonds from 20% to 15%.

### Will additional costs be incurred in the transition of the fund portfolios?

The investment exposures of the Portfolio Funds at any point reflects the ACD's views of the markets at that time and will not necessarily resemble the composition of their composite benchmarks. Given this, as at the date of this notification, asset exposures in the funds are already broadly reflective of the new SAA (and therefore of the proposed composite benchmarks). In this context, trading linked to the change of the composite benchmarks – including fund dilution costs, market spreads, broker commissions and transaction related taxes is expected to be minimal. Trading costs are borne by the relevant fund.

### Will the UK tax status of the Portfolio Funds change as a result of the change to the asset allocations?

The tax status of the funds will not change.

## Adoption of a new Responsible Investment Policy

In 2024, the ACD further developed its approach to responsible investing and introduced a new Scottish Widows Schroder Personal Wealth (ACD) Limited - Responsible Investment Policy. It is proposed that the new policy is applied to the Portfolio Funds with effect from 1<sup>st</sup> August 2025.

The SPW Responsible Investment Policy sets out:

#### *Exclusions/Restrictions*

The Investment Adviser is expected to broadly consider ESG characteristics in the investment selection process and there are a number of specific asset exclusions in which the Fund will not make an investment. Current exclusions include companies with revenue exposure to controversial weapons (cluster munitions, antipersonnel mines, chemical, and biological weapons) and thermal coal securities (companies that derive more than 20% of their revenues from thermal coal mining). The exclusionary restrictions only apply to direct investment and/or investment in collective investment schemes managed or operated by the ACD.

#### *Funds - ESG Assessment*

The ACD will undertake a firm-level assessment of the Collective Investment Scheme (CIS) parent company using a proprietary scoring process developed by the Investment Adviser to grade the investment management manager's ESG profile. The assessment considers five matters split across various categories each with a weighting that contributes towards the firm's overall ESG score. The categories and weightings as at the date of this Prospectus are as follows:

- **Credentials** (15%) – review of how long the firm has been practicing sustainable/responsible investment and its commitment to industry ESG initiatives (for example, UN Principles for Responsible Investment and UK Stewardship Code).
- **Culture** (20%) – assessment of the culture of the firm as it relates to ESG integration and the proportion of assets that are managed in a 'responsible' manner.
- **Capabilities** (15%) – appraisal of the level of ESG integration and the level of ESG resource (in-house and/or external).
- **Engagement** (20%) – evaluating how the firm engages and tracks progress on ESG issues.

- **Voting** (30%) – assessment of the firm’s voting policy on ESG matters.

The assessment uses a five-point scale (1 to 5, with 5 being the best) with an overall score calculated based on the weighted sum of all categories. The Fund will not invest in any CIS that falls below average (i.e. where it is scored 1 or 2). Assessments will be subject to annual reviews and if a CIS is found to have a below average firm level score, then the Investment Adviser will have three months to divest the Fund, subject to operational constraints.

The ACD will undertake a firm-level assessment of the CIS parent company using a proprietary scoring process developed by the Investment Adviser to grade the investment manager’s ESG profile. The assessment has a broad array of questions split across various categories. Each category has a weighting that contributes towards the firm’s overall ESG score. The assessment uses a five-point scale (1 to 5, with 5 being the best) with an overall score calculated based on the weighted sum of all categories. The Fund will not invest in any CIS that falls below average (i.e. where it is scored 1 or 2).

Assessments will be subject to annual reviews and if a CIS is found to have a below average firm level score, then the Investment Adviser will have three months to divest the Fund, subject to operational constraints.

### ***Engagement and Stewardship***

The Investment Adviser is expected to engage with the companies in which they invest, particularly where ESG factors relating to that company can be improved. The Investment Adviser will periodically produce an engagement report which will detail the engagement activity which has occurred within the Fund.

### ***Monitoring and Oversight***

The ACD expects the Investment Adviser to follow the UK Stewardship Codes to engage with the companies and/or CIS (as appropriate) in which the Fund invests to improve ESG performance. The ACD will monitor the Fund to ensure that the Responsible Investment Policy is implemented appropriately.

The Policy is available on spw.com. The policy will be updated from time to time and will be reviewed at least annually.

### ***SPW Investment Fund Company***

The SPW Investment Fund Company sub-funds do not seek to achieve specified, positive sustainable outcomes, however, the ACD aims for fund portfolios to achieve higher overall sustainability scores than those of their respective composite benchmarks, as measured by the Investment Adviser’s rating system.

The Investment Adviser currently calculates a Fund’s overall scores by aggregating the scores of the underlying funds in which it is invested and comparing this against the score of the Fund benchmark. Individual underlying funds may not necessarily have better scores than that of their respective benchmarks (if any).

### What is the impact on the Investment Policy of the SPW Portfolio Funds?

The introduction of the SPW ACD Responsible Investment Policy will result in the removal of ESG related matters from the Investment Policy of the funds. The Prospectus will instead direct investors to the SPW ACD Responsible Investment Policy, in which the approach is explained.

The adoption of the new SPW ACD Responsible Investment Policy is not expected to have a material impact on fund portfolios.

## Changes to the SPW Portfolio Funds fee structure

### What are we doing?

We are changing the way that we calculate and charge the fees for the management and operation of the funds.

### Why are we doing it?

Across our funds, we are evolving our approach to fees and charges – to provide greater simplicity and clarity.

We are therefore adopting an approach through which investors can readily understand our charges and what we are paying from these, to clarify who is paying the fees of the Investment Adviser (and other material service providers) and to explain the other costs that can arise in relation to the operation of the funds.

The new approach involves the introduction of an ACD Annual Management Charge ('AMC') and this will replace the current "All-in charge" structure. Details of the breakdown of the charges are given in Appendix 2.

### How does this change effect the charges of the funds?

As explained in Appendix 2, the ACD will aim to discount the AMC to a level that means that the total charge paid by investors in the funds is unchanged from the current level of the All-in charge (of 0.65% for the Q share class and 0.30% for the X share class). As has historically been the case under the All-in charge approach, the ACD does not believe that an opportunity to reduce the fund charges will arise in the foreseeable future.

### When will it happen?

With effect from 1<sup>st</sup> August 2025.

If you have any questions about these changes, please contact your financial adviser or call our Customer Services Centre on +44 (0) 344 822 8910. Please be aware that the Customer Services Centre cannot give investment advice

Please contact us if you would like this information in an alternative format such as Braille, large print or audio.

## Appendix 1

Fund	Investment Objective	Investment Policy
SPW Cautious Portfolio	<p>The Fund aims to provide income and capital growth in excess of the benchmark* (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.</p> <p>*The Fund's benchmark is a composite of 11% MSCI ACWI (Net Total Return) index, 5% MSCI UK IMI (Gross Total Return) index, 13% Bloomberg Global Treasury Value GBP Hedged index, 46% Bloomberg Global Aggregate Corporate Value GBP Hedged index, 4% Bloomberg Global High Yield Corporate Value GBP Hedged index, 4% Bloomberg Emerging Market Debt Value GBP Hedged index, 4% MSCI World IMI Core Real Estate (Net Total Return) index, 7% SONIA plus 2%, 4% SONIA and 2% Bloomberg Commodity Total Return index.</p> <p>*The Fund's benchmark is a composite of 26.4% MSCI ACWI (Net Total Return) index, 3.6% MSCI UK IMI (Gross Total Return) index, 18.5% Bloomberg Global Aggregate Treasury (Total Return) GBP Hedged index, 9% Bloomberg Global Aggregate Corporate (Total Return) GBP Hedged index, 3.5% Bloomberg Global High Yield Corporate (Total Return) GBP Hedged index, 18.5% Bloomberg Global Aggregate Treasury Value 1-5 Years (Total Return) GBP Hedged Index, 18.5% Bloomberg Global Aggregate Corporate Value 1-5 Years (Total Return) GBP Hedged Index, and 2% SONIA.</p>	<p>The Fund is actively managed and invests its assets directly, or indirectly through collective investment schemes, exchange traded funds, real estate investment trusts, or closed ended funds (collective investment schemes and other funds) to gain exposure to equities, bonds and alternative assets worldwide. Exposure to alternative assets including property, commodities and currencies may be obtained through derivatives (where permitted) and by investing in funds that invest indirectly in these assets. The Fund may also invest in funds that use absolute return strategies or other alternative investment strategies.</p> <p>The Fund seeks to increase returns and reduce downside risk by making tactical adjustments to its holdings based on market conditions.</p> <p>The Fund will invest within the following ranges:</p> <p>Bonds 45% – 80%</p> <p>Equities 5% – 30%</p> <p>Alternative investments 0% – 25%</p> <p>The Fund may invest up to 20% of its assets in below investment grade bonds (as measured by a regulated credit rating agency) or in unrated bonds.</p> <p>The Fund may invest up to 100% of its assets in collective investment schemes, including funds managed by the ACD, the Investment Adviser or their associates.</p> <p>The Fund maintains a higher overall sustainability score than that of its composite benchmark, based on the Investment Adviser's sustainability rating system. The Investment Adviser aims to select actively managed collective investment schemes or other funds which deliver a superior sustainability score than their respective benchmark, however, individual securities held in these funds' portfolios may not necessarily have positive environmental, social or governance characteristics. More details on the sustainability rating system used to achieve this can be found in the Fund Characteristics section.</p>

Fund	Investment Objective	Investment Policy
		<p>The Fund will not invest in a collective investment scheme or other fund that invests more than 50% of its assets directly or indirectly (via derivatives) in fossil fuel-based energy companies.</p> <p>The Fund may also invest in money market instruments and may hold cash.</p> <p>The Fund may use derivatives with the aim of reducing risk, managing the Fund more efficiently (often referred to as 'efficient portfolio management') or for investment purposes. The Fund will not take long positions in single sector equity or bond index derivatives which provide more than 50% exposure (based on the underlying index value) to fossil fuel-based energy securities.</p> <p><u>In selecting investments for the Fund, the ACD will take into account ESG factors (as set out below). The ACD's ESG factors do not apply to the following asset classes: money market instruments, cash, near cash and derivatives. Additionally, where the fund invests in collective investment schemes managed or operated by a firm other than the ACD, the assets held in such schemes are selected by that firm and are not assessed under, and will not necessarily meet, the ACD's Responsible Investment Policy. The ACD's Responsible Investment Policy is available on its website.</u></p>
SPW Discovery Portfolio	<p>The Fund aims to provide income and capital growth in excess of the benchmark* (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.</p> <p>*The Fund's benchmark is a composite of 22% MSCI ACWI (Net Total Return) index, 8% MSCI UK IMI (Gross Total Return) index, 10% Bloomberg Global Treasury Value GBP Hedged index, 36% Bloomberg Global Aggregate Corporate Value GBP Hedged index, 3.5% Bloomberg Global High Yield Corporate Value GBP Hedged index, 3.5% Bloomberg Emerging Market Debt Value GBP Hedged index, 4% MSCI World IMI Core Real Estate (Net Total Return) Index, 7% SONIA plus 2%, 4% SONIA and 2% Bloomberg Commodity Total Return index.</p> <p>*The Fund's benchmark is a composite of 39.3% MSCI ACWI (Net Total Return) index, 5.7% MSCI UK IMI (Gross Total Return) index, 17% Bloomberg Global Aggregate Treasury (Total Return) GBP Hedged index, 8% Bloomberg Global Aggregate Corporate (Total Return) GBP Hedged index, 3%</p>	<p>The Fund is actively managed and invests its assets directly, or indirectly through collective investment schemes, exchange traded funds, real estate investment trusts, or closed ended funds (collective investment schemes and other funds) to gain exposure to equities, bonds and alternative assets worldwide. Exposure to alternative assets including property, commodities and currencies may be obtained through derivatives (where permitted) and by investing in funds that invest indirectly in these assets. The Fund may also invest in funds that use absolute return strategies or other alternative investment strategies.</p> <p>The Fund seeks to increase returns and reduce downside risk by making tactical adjustments to its holdings based on market conditions.</p> <p>The Fund will invest within the following ranges:</p> <p>Bonds 30% – 70%</p>

Fund	Investment Objective	Investment Policy
	<p>Bloomberg Global High Yield Corporate (Total Return) GBP Hedged index, 17% Bloomberg Global Aggregate Treasury Value 1-5 Years (Total Return) GBP Hedged Index, 8% Bloomberg Global Aggregate Corporate Value 1-5 Years (Total Return) GBP Hedged Index, and 2% SONIA.</p>	<p>Equities 15% – 50%</p> <p>Alternative investments 0% – 25%</p> <p>The Fund may invest up to 20% of its assets in below investment grade bonds (as measured by a regulated credit rating agency) or in unrated bonds.</p> <p>The Fund may invest up to 100% of its assets in collective investment schemes, including funds managed by the ACD, the Investment Adviser or their associates.</p> <p>The Fund maintains a higher overall sustainability score than that of its composite benchmark, based on the Investment Adviser's sustainability rating system. The Investment Adviser aims to select actively managed collective investment schemes or other funds which deliver a superior sustainability score than their respective benchmark, however, individual securities held in these funds' portfolios may not necessarily have positive environmental, social or governance characteristics. More details on the sustainability rating system used to achieve this can be found in the Fund Characteristics section.</p> <p>The Fund will not invest in a collective investment scheme or other fund that invests more than 50% of its assets directly or indirectly (via derivatives) in fossil fuel-based energy companies.</p> <p>The Fund may also invest in money market instruments and may hold cash.</p> <p>The Fund may use derivatives with the aim of reducing risk, managing the Fund more efficiently (often referred to as 'efficient portfolio management') or for investment purposes. The Fund will not take long positions in single sector equity or bond index derivatives which provide more than 50% exposure (based on the underlying index value) to fossil fuel-based energy securities.</p> <p><u>In selecting investments for the Fund, the ACD will take into account ESG factors (as set out below). The ACD's ESG factors do not apply to the following asset classes: money market instruments, cash, near cash and derivatives. Additionally, where the fund invests in collective investment schemes managed or operated by a firm other than the ACD, the assets held in such schemes are selected by that firm and are not assessed under, and will</u></p>

Fund	Investment Objective	Investment Policy
		<u>not necessarily meet, the ACD's Responsible Investment Policy. The ACD's Responsible Investment Policy is available on its website.</u>
SPW Balanced Portfolio	<p>The Fund aims to provide capital growth and income in excess of the benchmark* (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.</p> <p><del>*The Fund's benchmark is a composite of 32% MSCI ACWI (Net Total Return) index, 13% MSCI UK IMI (Gross Total Return) index, 7% Bloomberg Global Treasury Value GBP Hedged index, 26% Bloomberg Global Aggregate Corporate Value GBP Hedged index, 2.5% Bloomberg Global High Yield Corporate Value GBP Hedged index, 2.5% Bloomberg Emerging Market Debt Value GBP Hedged index, 4% MSCI World IMI Core Real Estate (Net Total Return) index, 6% SONIA plus 2%, 4% SONIA and 3% Bloomberg Commodity Total Return index.</del></p> <p>*The Fund's benchmark is a composite of 52.8% MSCI ACWI (Net Total Return) index, 7.2% MSCI UK IMI (Gross Total Return) index, 12.5% Bloomberg Global Aggregate Treasury (Total Return) GBP Hedged index, 5.5% Bloomberg Global Aggregate Corporate (Total Return) GBP Hedged index, 2% Bloomberg Global High Yield Corporate (Total Return) GBP Hedged index, 12.5% Bloomberg Global Aggregate Treasury Value 1-5 Years (Total Return) GBP Hedged Index, 5.5% Bloomberg Global Aggregate Corporate Value 1-5 Years (Total Return) GBP Hedged Index, and 2% SONIA.</p>	<p>The Fund is actively managed and invests its assets directly, or indirectly through collective investment schemes, exchange traded funds, real estate investment trusts, or closed ended funds (collective investment schemes and other funds) to gain exposure to equities, bonds and alternative assets worldwide. Exposure to alternative assets including property, commodities and currencies may be obtained through derivatives (where permitted) and by investing in funds that invest indirectly in these assets. The Fund may also invest in funds that use absolute return strategies or other alternative investment strategies.</p> <p>The Fund seeks to increase returns and reduce downside risk by making tactical adjustments to its holdings based on market conditions.</p> <p>The Fund will invest within the following ranges:</p> <p>Bonds 20% – 55%</p> <p>Equities 30% – 65%</p> <p>Alternative investments 0% – 25%</p> <p>The Fund may invest up to 20% of its assets in below investment grade bonds (as measured by a regulated credit rating agency) or in unrated bonds.</p> <p>The Fund may invest up to 100% of its assets in collective investment schemes, including funds managed by the ACD, the Investment Adviser or their associates.</p> <p><del>The Fund maintains a higher overall sustainability score than that of its composite benchmark, based on the Investment Adviser's sustainability rating system. The Investment Adviser aims to select actively managed collective investment schemes or other funds which deliver a superior sustainability score than their respective benchmark, however, individual securities held in these funds' portfolios may not necessarily have positive environmental, social or governance characteristics. More details on the sustainability rating system used to achieve this can be found in the Fund Characteristics section.</del></p>



Fund	Investment Objective	Investment Policy
		<p>The Fund will not invest in a collective investment scheme or other fund that invests more than 50% of its assets directly or indirectly (via derivatives) in fossil fuel-based energy companies.</p> <p>The Fund may also invest in money market instruments and may hold cash.</p> <p>The Fund may use derivatives with the aim of reducing risk, managing the Fund more efficiently (often referred to as 'efficient portfolio management') or for investment purposes. The Fund will not take long positions in single sector equity or bond index derivatives which provide more than 50% exposure (based on the underlying index value) to fossil fuel-based energy securities.</p> <p><u>In selecting investments for the Fund, the ACD will take into account ESG factors (as set out below). The ACD's ESG factors do not apply to the following asset classes: money market instruments, cash, near cash and derivatives. Additionally, where the fund invests in collective investment schemes managed or operated by a firm other than the ACD, the assets held in such schemes are selected by that firm and are not assessed under, and will not necessarily meet, the ACD's Responsible Investment Policy. The ACD's Responsible Investment Policy is available on its website.</u></p>
SPW Progressive Portfolio	<p>The Fund aims to provide capital growth and income in excess of the benchmark* (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.</p> <p><i>*The Fund's benchmark is a composite of 47% MSCI ACWI (Net Total Return) index, 18% MSCI UK IMI (Gross Total Return) index, 3% Bloomberg Global Treasury Value GBP Hedged index, 13% Bloomberg Global Aggregate Corporate Value GBP Hedged index, 1.5% Bloomberg Global High Yield Corporate Value GBP Hedged index, 1.5% Bloomberg Emerging Market Debt Value GBP Hedged index, 5% MSCI World IMI Core Real Estate (Net Total Return) index, 4% SONIA plus 2%, 4% SONIA and 3% Bloomberg Commodity Total Return index.</i></p> <p><i>*The Fund's benchmark is a composite of 66.3% MSCI ACWI (Net Total Return) index, 8.7% MSCI UK IMI (Gross Total Return) index, 11% Bloomberg Global Aggregate Treasury (Total Return) GBP Hedged index, 5% Bloomberg Global Aggregate Corporate (Total Return) GBP Hedged index, 1% Bloomberg</i></p>	<p>The Fund is actively managed and invests its assets directly, or indirectly through collective investment schemes, exchange traded funds, real estate investment trusts, or closed ended funds (collective investment schemes and other funds) to gain exposure to equities, bonds and alternative assets worldwide. Exposure to alternative assets including property, commodities and currencies may be obtained through derivatives (where permitted) and by investing in funds that invest indirectly in these assets. The Fund may also invest in funds that use absolute return strategies or other alternative investment strategies.</p> <p>The Fund seeks to increase returns and reduce downside risk by making tactical adjustments to its holdings based on market conditions.</p> <p>The Fund will invest within the following ranges:</p> <p>Bonds 0% – 35%</p>

Fund	Investment Objective	Investment Policy
	<p>Global High Yield Corporate (Total Return) GBP Hedged index, 4% Bloomberg Global Aggregate Treasury Value 1-5 Years (Total Return) GBP Hedged Index, 2% Bloomberg Global Aggregate Corporate Value 1-5 Years (Total Return) GBP Hedged Index, and 2% SONIA.</p>	<p>Equities 50% – 80%</p> <p>Alternative investments 0% – 25%</p> <p>The Fund may invest up to 20% of its assets in below investment grade bonds (as measured by a regulated credit rating agency) or in unrated bonds.</p> <p>The Fund may invest up to 100% of its assets in collective investment schemes, including funds managed by the ACD, the Investment Adviser or their associates.</p> <p>The Fund maintains a higher overall sustainability score than that of its composite benchmark, based on the Investment Adviser's sustainability rating system. The Investment Adviser aims to select actively managed collective investment schemes or other funds which deliver a superior sustainability score than their respective benchmark, however, individual securities held in these funds' portfolios may not necessarily have positive environmental, social or governance characteristics. More details on the sustainability rating system used to achieve this can be found in the Fund Characteristics section.</p> <p>The Fund will not invest in a collective investment scheme or other fund that invests more than 50% of its assets directly or indirectly (via derivatives) in fossil fuel-based energy companies.</p> <p>The Fund may also invest in money market instruments and may hold cash.</p> <p>The Fund may use derivatives with the aim of reducing risk, managing the Fund more efficiently (often referred to as 'efficient portfolio management') or for investment purposes. The Fund will not take long positions in single sector equity or bond index derivatives which provide more than 50% exposure (based on the underlying index value) to fossil fuel-based energy securities.</p> <p><u>In selecting investments for the Fund, the ACD will take into account ESG factors (as set out below). The ACD's ESG factors do not apply to the following asset classes: money market instruments, cash, near cash and derivatives. Additionally, where the fund invests in collective investment schemes managed or operated by a firm other than the ACD, the assets held in such schemes are selected by that firm and are not assessed under, and will</u></p>

Fund	Investment Objective	Investment Policy
		<u>not necessarily meet, the ACD's Responsible Investment Policy. The ACD's Responsible Investment Policy is available on its website.</u>
SPW Dynamic Portfolio	<p>The Fund aims to provide capital growth and income in excess of the benchmark* (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.</p> <p><del>*The Fund's benchmark is a composite of 55% MSCI ACWI (Net Total Return) index, 21% MSCI UK IMI (Gross Total Return) index, 2% Bloomberg Global Treasury Value GBP Hedged index, 8% Bloomberg Global Aggregate Corporate Value GBP Hedged index, 1% Bloomberg Global High Yield Corporate Value GBP Hedged index, 1% Bloomberg Emerging Market Debt Value GBP Hedged index, 5% MSCI World IMI Core Real Estate (Net Total Return) index, 4% SONIA and 3% Bloomberg Commodity Total Return index.</del></p> <p>*The Fund's benchmark is a composite of 70.4% MSCI ACWI (Net Total Return) index, 9.6% MSCI UK IMI (Gross Total Return) index, 11% Bloomberg Global Aggregate Treasury (Total Return) GBP Hedged index, 4% Bloomberg Global Aggregate Corporate (Total Return) GBP Hedged index, 1% Bloomberg Global High Yield Corporate (Total Return) GBP Hedged index, 1% Bloomberg Global Aggregate Treasury Value 1-5 Years (Total Return) GBP Hedged Index, 1% Bloomberg Global Aggregate Corporate Value 1-5 Years (Total Return) GBP Hedged Index, and 2% SONIA.</p>	<p>The Fund is actively managed and invests its assets directly, or indirectly through collective investment schemes, exchange traded funds, real estate investment trusts, or closed ended funds (collective investment schemes and other funds) to gain exposure to equities, bonds and alternative assets worldwide. Exposure to alternative assets including property, commodities and currencies may be obtained through derivatives (where permitted) and by investing in funds that invest indirectly in these assets. The Fund may also invest in funds that use absolute return strategies or other alternative investment strategies.</p> <p>The Fund seeks to increase returns and reduce downside risk by making tactical adjustments to its holdings based on market conditions.</p> <p>The Fund will invest within the following ranges:</p> <p>Bonds 0% – 25%</p> <p>Equities 60% – 95%</p> <p>Alternative investments 0% – 25%</p> <p>The Fund may invest up to 20% of its assets in below investment grade bonds (as measured by a regulated credit rating agency) or in unrated bonds.</p> <p>The Fund may invest up to 100% of its assets in collective investment schemes, including funds managed by the ACD, the Investment Adviser or their associates.</p> <p><del>The Fund maintains a higher overall sustainability score than that of its composite benchmark, based on the Investment Adviser's sustainability rating system. The Investment Adviser aims to select actively managed collective investment schemes or other funds which deliver a superior sustainability score than their respective benchmark, however, individual securities held in these funds' portfolios may not necessarily have positive environmental, social or governance characteristics. More details on the sustainability rating system used to achieve this can be found in the Fund Characteristics section.</del></p>

Fund	Investment Objective	Investment Policy
		<p>The Fund will not invest in a collective investment scheme or other fund that invests more than 50% of its assets directly or indirectly (via derivatives) in fossil fuel-based energy companies.</p> <p>The Fund may also invest in money market instruments and may hold cash.</p> <p>The Fund may use derivatives with the aim of reducing risk, managing the Fund more efficiently (often referred to as 'efficient portfolio management') or for investment purposes. The Fund will not take long positions in single sector equity or bond index derivatives which provide more than 50% exposure (based on the underlying index value) to fossil fuel-based energy securities.</p> <p><u>In selecting investments for the Fund, the ACD will take into account ESG factors (as set out below). The ACD's ESG factors do not apply to the following asset classes: money market instruments, cash, near cash and derivatives. Additionally, where the fund invests in collective investment schemes managed or operated by a firm other than the ACD, the assets held in such schemes are selected by that firm and are not assessed under, and will not necessarily meet, the ACD's Responsible Investment Policy. The ACD's Responsible Investment Policy is available on its website.</u></p>
SPW Adventurous Portfolio	<p>The Fund aims to provide capital growth and income in excess of the benchmark* (after the deduction of fees) over five to seven years by investing in a diversified range of assets and markets worldwide.</p> <p><i>*The Fund's benchmark is a composite of 74% MSCI ACWI (Net Total Return) index, 15% MSCI UK IMI (Gross Total Return) index, 1% Bloomberg Global High Yield Corporate Value GBP Hedged index, 1% Bloomberg Emerging Market Debt Value GBP Hedged index, 5% MSCI World IMI Core Real Estate (Net Total Return) index, 2% SONIA and 2% Bloomberg Commodity Total Return index.</i></p> <p><i>*The Fund's benchmark is a composite of 79.2% MSCI ACWI (Net Total Return) index, 10.8% MSCI UK IMI (Gross Total Return) index, 5% Bloomberg Global Aggregate Treasury (Total Return) GBP Hedged index, 3% Bloomberg Global Aggregate Corporate (Total Return) GBP Hedged index, and 2% SONIA.</i></p>	<p>The Fund is actively managed and invests its assets directly, or indirectly through collective investment schemes, exchange traded funds, real estate investment trusts, or closed ended funds (collective investment schemes and other funds) to gain exposure to equities, bonds and alternative assets worldwide. Exposure to alternative assets including property, commodities and currencies may be obtained through derivatives (where permitted) and by investing in funds that invest indirectly in these assets. The Fund may also invest in funds that use absolute return strategies or other alternative investment strategies.</p> <p>The Fund seeks to increase returns and reduce downside risk by making tactical adjustments to its holdings based on market conditions.</p> <p>The Fund will invest within the following ranges:</p> <p>Bonds 0% – 15%</p>

Fund	Investment Objective	Investment Policy
		<p>Equities 75% – 100%</p> <p>Alternative investments 0% – 20%</p> <p>The Fund may invest up to <del>15</del>20% of its assets in below investment grade bonds (as measured by a regulated credit rating agency) or in unrated bonds.</p> <p>The Fund may invest up to 100% of its assets in collective investment schemes, including funds managed by the ACD, the Investment Adviser or their associates.</p> <p>The Fund maintains a higher overall sustainability score than that of its composite benchmark, based on the Investment Adviser's sustainability rating system. The Investment Adviser aims to select actively managed collective investment schemes or other funds which deliver a superior sustainability score than their respective benchmark, however, individual securities held in these funds' portfolios may not necessarily have positive environmental, social or governance characteristics. More details on the sustainability rating system used to achieve this can be found in the Fund Characteristics section.</p> <p>The Fund will not invest in a collective investment scheme or other fund that invests more than 50% of its assets directly or indirectly (via derivatives) in fossil fuel-based energy companies.</p> <p>The Fund may also invest in money market instruments and may hold cash.</p> <p>The Fund may use derivatives with the aim of reducing risk, managing the Fund more efficiently (often referred to as 'efficient portfolio management') or for investment purposes. The Fund will not take long positions in single sector equity or bond index derivatives which provide more than 50% exposure (based on the underlying index value) to fossil fuel-based energy securities.</p> <p><u>In selecting investments for the Fund, the ACD will take into account ESG factors (as set out below). The ACD's ESG factors do not apply to the following asset classes: money market instruments, cash, near cash and derivatives. Additionally, where the fund invests in collective investment schemes managed or operated by a firm other than the ACD, the assets held in such schemes are selected by that firm and are not assessed under, and will</u></p>

Fund	Investment Objective	Investment Policy
		<u>not necessarily meet, the ACD's Responsible Investment Policy. The ACD's Responsible Investment Policy is available on its website.</u>

## Appendix 2

Summary of Changes to Fee Structure (from 1<sup>st</sup> August 2025)

The following terms will help you understand the table below:

- **"ACD"**, the authorised corporate director of the SPW Investment Fund Company ICVC, being Scottish Widows Schroder Personal Wealth (ACD) Limited;
- **"Annual Management Charge"**, a charge taken from Scheme Property and payable to the ACD for the management and operation of a Fund;
- **"bps"**, basis points, a unit of measure used in finance to describe the percentage change in the value or rate of a financial instrument (for example, one basis point is equivalent to 0.01% (1/100th of a percent) or 0.0001 in decimal form);
- **"Fund"**, a sub-fund of the SPW Investment Fund Company as set out in the table below;
- **"OCF"**, the Ongoing Charges Figure, an all-inclusive figure for the running costs of the relevant Fund based on a standardised methodology. It gives an indication of the overall cost of investing in a Fund. The OCF is made up of the Annual Management Charge and a variety of other operating costs such as registration charges, fees payable to the depositary and the custodian; and
- **"Scheme Property"**, the property of a Fund.

As at 31<sup>st</sup> March 2025 the charges and costs in respect of the SPW Portfolio Funds were as follows. The level of the effective discount will change and will be determined by the non-AMC costs and charges at any point in time. Any fall in such costs would result in a reduction in the level of AMC discount applied by the ACD and the Fund Charge paid by investors in the funds will not change. Were such costs to increase, this would have no impact on the Fund Charge as the additional cost would be paid by the ACD.

Fund/Share Class	Current All-In Charge (and OCF)	New AMC	New Fund Charge (and OCF)	Other Costs (Fund/Synthetic)	Total Fund Costs	Effective 'Discount'
SPW Cautious Portfolio/Q	0.65%	0.65%	0.65%	0.03%/0.08%	0.76%	0.11%
SPW Cautious Portfolio/X	0.30%	0.30%	0.30%	0.03%/0.08%	0.41%	0.11%
SPW Discovery Portfolio/Q	0.65%	0.65%	0.65%	0.04%/0.06%	0.75%	0.10%
SPW Discovery Portfolio/X	0.30%	0.30%	0.30%	0.04%/0.06%	0.40%	0.10%
SPW Balanced Portfolio/Q	0.65%	0.65%	0.65%	0.02%/0.06%	0.73%	0.08%
SPW Balanced Portfolio/X	0.30%	0.30%	0.30%	0.02%/0.06%	0.38%	0.08%
SPW Progressive Portfolio/Q	0.65%	0.65%	0.65%	0.03%/0.06%	0.74%	0.09%
SPW Progressive Portfolio/X	0.30%	0.30%	0.30%	0.03%/0.06%	0.39%	0.09%
SPW Dynamic Portfolio/Q	0.65%	0.65%	0.65%	0.07%/0.06%	0.78%	0.13%
SPW Dynamic Portfolio/X	0.30%	0.30%	0.30%	0.07%/0.06%	0.43%	0.13%
SPW Adventurous Portfolio/Q	0.65%	0.65%	0.65%	0.13%/0.06%	0.84%	0.19%
SPW Adventurous Portfolio/X	0.30%	0.30%	0.30%	0.13%/0.06%	0.49%	0.19%

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