

PHOENIX UNIT TRUST MANAGERS

MANAGER'S ANNUAL REPORT

For the year: 1 October 2023 to 30 September 2024

PUTM BOTHWELL LONG GILT STERLING HEDGED FUND



Contents

Investment review*	2-3
Portfolio of investments*	4
Top ten purchases and sales	5
Statistical information*	6-8
Statements of total return & change in unitholders' funds	9
Balance sheet	10
Notes to the financial statements	11-19
Distribution tables	20
Responsibilities of the manager and the trustee	21
Trustee's report and directors' statement	22
Independent auditor's report	23-25
Corporate information*	26-28

*These collectively comprise the Authorised Fund Manager's Report.

Investment review

Dear Investor

Welcome to the PUTM Bothwell Long Gilt Sterling Hedged Fund annual report for the 12 months to 30 September 2024.

Performance Review

Over the review period, the PUTM Bothwell Long Gilt Sterling Hedged Fund returned 10.12% (Source: abrdn, Gross of AMC, GBP, based upon the movement in the Cancellation Price for twelve months to 30/09/2024). This was compared to the return of 10.09% for its benchmark index (Source: FactSet, FTSE Actuaries UK Conventional Gilts (Over 15 Years) Index, Total Return, GBP for 12 months to 30/09/2024).

In the table below, you can see how the Fund performed against its benchmark index over the last five discrete one-year periods.

Standardised Past Performance

	Sep 23-24 % growth	Sep 22-23 % growth	Sep 21-22 % growth	Sep 20-21 % growth	Sep 19-20 % growth
PUTM Bothwell Long Gilt Sterling Hedged Fund	10.12	-12.72	-35.58	-11.26	5.25
Benchmark Index	10.09	-12.77	-35.51	-11.24	5.22

Source: Fund performance is abrdn, Gross of AMC, GBP, based upon the movement in the Cancellation Price to 30 September for each year. Benchmark Index performance is FactSet, FTSE Brit Govt Over 15 Years, Total Return, GBP to 30 September for each year.

Past performance is not a guide to future performance.

Please note that all past performance figures are calculated without taking the initial charge into account.

The value of units and the income from them can go down as well as up and is not guaranteed. You may not get back the full amount invested.

Investment review

Portfolio and Market Review

Global and UK government bonds recorded a strong 12-month performance despite volatility during the review period. Growing expectations that global inflation pressures may be peaking, led to hopes that developed market (DM) central banks may start decreasing interest rates in 2024.

The final quarter of 2023 started with the onset of hostilities in the Middle East and led to significant market uncertainty at the beginning of October 2023. Fears of escalation and rising oil prices plagued the economic landscape. Fuel prices kept UK inflation elevated above consensus at 6.7% year on year, while the core figure fell to 6.1%. The Bank of England (BoE) communications in October reiterated that interest rates will stay higher for longer. At its November meeting, as widely anticipated, the BoE held rates at 5.25%, with a 6-3 vote delivering a somewhat hawkish tone. But while the central bank continued to deliver cautious messaging, the market was shifting towards a consensus that the interest rate-hiking cycle was over. In December, Gilts outperformed their European counterparts. Once more, the BoE held interest rates at 5.25%, while reiterating its prior messaging of “sufficiently restrictive for sufficiently long”. While the tone was perhaps more hawkish than the market had expected, the messaging was essentially unchanged.

Subsequently, the first quarter of 2024 generally delivered a challenging environment for DM government bonds. Yields mostly rose as markets reduced their expectations for near-term interest rate cuts. Robust US economic data and cautious comments from DM central banks left questions on the timing of rate cuts and the extent to which policymakers could ease rates. In the UK, the narrative was little changed over the first quarter. Inflation data came down quicker than markets anticipated, and the labour market loosened. Data released in the first quarter showed that the UK had slipped into technical recession in the fourth quarter. However, for the first quarter of 2024, it looked like growth would be positive. The BoE communication then evolved to line up a rate cut in the second quarter. Additionally, the two hawks on the Monetary Policy Committee joined the majority by no longer voting for a rate hike.

In the second quarter, government bond markets remained volatile. We saw significant moves in yields after any inflation and labour market data that surprised against expectations. Stronger-than-expected inflation in the US dragged yields higher across most DMs. Towards the end of the quarter, European markets were dominated by political volatility in France. Following the European parliamentary elections, President Macron’s centrist party

was severely beaten by Marine Le Pen’s far-right National Rally, Macron called for snap parliamentary elections. This caused European government bond spreads to widen materially. The spread between 10-year French and German government bonds widened by 29 basis points (bps) in one week as German Bunds outperformed on the general risk-off tone.

Finally, in the third quarter of 2024, government bonds rallied, boosted by a considerable increase in rate cut expectations. Initially, markets welcomed a dovish shift from the US Federal Reserve (Fed), in particular. This was attributable to weaker US labour market data and signs of further easing of inflation measures. Indeed, much of September was dominated by the debate about to what extent the Fed would reduce interest rates, and this culminated in a larger-than-consensus reduction by 50bps. Meanwhile, the European Central Bank also cut rates by 25bps in September. Finally, the BoE lowered its bank rate by 25bps to 5.0% in August before leaving it unchanged in September. Corporate bonds also had a solid quarter. In the US, riskier high-yield bonds and higher-quality investment-grade bonds fared well, with the spreads on both instruments tightening.

Over the review period, the Fund’s activity was restricted to managing cash inflows and outflows, matching index events and portfolio rebalancing. All activity was undertaken to ensure that Fund returns were in line with the benchmark, as per the objective. No active risk positions were taken. The Fund performed in line with its benchmark over the period. Tracking error was minimal.

Market Outlook and Fund Strategy

We believe we are approaching the end of the economic cycle. This belief is reinforced by data across DM economies showing a softening in activity, a loosening in labour markets and a decline in inflation measures. Accordingly, we see medium-term value in owning global government bonds. We anticipate a rate-cutting cycle-led decline in yields, primarily via a steepening of the curve through falls in short-end yields. Central bank data dependency continues to exacerbate government bond volatility. Services inflation is proving more resilient than desired in certain quarters. We continue to trade nimbly, but prefer a neutral-long duration bias, especially as most DM central banks are growing more comfortable with monetary policy easing. With the rate-cutting cycle having commenced, but with political risk and high bond supply still present, we favour curve steepening. Country and SSA spreads in Europe have mostly tightened in 2024. While they are unlikely to perform strongly from here, we still see merit in favouring higher quality names.

Portfolio of investments (unaudited)

Investments held at 30 September 2024

Holding	Investment	Market value £000	Percentage of total net assets %
	United Kingdom		
	Government Bonds (30/09/23 - 98.84%)		98.75
£1,795,800	UK Treasury 0.5% 22/10/2061	548	1.77
£1,979,700	UK Treasury 0.625% 22/10/2050	814	2.62
£1,489,400	UK Treasury 0.875% 31/01/2046	755	2.43
£683,292	UK Treasury 1.125% 22/10/2073	254	0.82
£2,140,500	UK Treasury 1.25% 22/10/2041	1,342	4.33
£1,824,800	UK Treasury 1.25% 31/07/2051	900	2.90
£1,566,123	UK Treasury 1.5% 22/07/2047	897	2.89
£1,472,700	UK Treasury 1.5% 31/07/2053	756	2.44
£1,542,900	UK Treasury 1.625% 22/10/2054	811	2.61
£1,503,100	UK Treasury 1.625% 22/10/2071	694	2.24
£1,875,100	UK Treasury 1.75% 22/01/2049	1,112	3.58
£1,913,776	UK Treasury 1.75% 22/07/2057	1,019	3.29
£1,289,133	UK Treasury 2.5% 22/07/2065	816	2.63
£1,787,931	UK Treasury 3.25% 22/01/2044	1,502	4.84
£1,789,290	UK Treasury 3.5% 22/01/2045	1,549	5.00
£1,296,577	UK Treasury 3.5% 22/07/2068	1,058	3.41
£1,549,064	UK Treasury 3.75% 22/07/2052	1,350	4.35
£1,699,605	UK Treasury 3.75% 22/10/2053	1,474	4.75
£1,512,453	UK Treasury 4% 22/01/2060	1,372	4.42
£963,300	UK Treasury 4% 22/10/2063	870	2.80
£1,670,721	UK Treasury 4.25% 07/12/2040	1,649	5.32
£1,561,181	UK Treasury 4.25% 07/12/2046	1,498	4.83
£1,364,900	UK Treasury 4.25% 07/12/2049	1,302	4.20
£1,685,743	UK Treasury 4.25% 07/12/2055	1,597	5.15
£549,000	UK Treasury 4.375% 31/01/2040	552	1.78
£1,009,700	UK Treasury 4.375% 31/07/2054	975	3.14
£1,714,500	UK Treasury 4.5% 07/12/2042	1,728	5.57
£1,390,300	UK Treasury 4.75% 22/10/2043	1,438	4.64
	Portfolio of investments	30,632	98.75
	Net other assets	387	1.25
	Net assets	31,019	100.00

Unless otherwise stated, all investments are approved securities being either officially listed in a member state or traded on or under the rules of an eligible securities market.

Top ten purchases and sales

For the year ended 30 September 2024

Purchases	Cost £000	Sales	Proceeds £000
UK Treasury 4.75% 22/10/2043	1,589	UK Treasury 4.75% 07/12/2038	1,758
UK Treasury 4.375% 31/07/2054	970	UK Treasury 4.25% 07/09/2039	1,721
UK Treasury 3.75% 22/10/2053	632	UK Treasury 1.125% 31/01/2039	1,083
UK Treasury 4.375% 31/01/2040	555	UK Treasury 4.5% 07/12/2042	386
UK Treasury 4% 22/10/2063	375	UK Treasury 4.25% 07/12/2046	313
UK Treasury 4.5% 07/12/2042	269	UK Treasury 4.25% 07/12/2040	258
UK Treasury 1.5% 31/07/2053	264	UK Treasury 3.25% 22/01/2044	247
UK Treasury 4.25% 07/12/2046	260	UK Treasury 1.75% 22/01/2049	241
UK Treasury 4.25% 07/12/2049	247	UK Treasury 4.25% 07/12/2049	240
UK Treasury 1.75% 22/01/2049	212	UK Treasury 4% 22/01/2060	235
Subtotal	5,373	Subtotal	6,482
Other purchases	2,187	Other sales	2,334
Total purchases for the year	7,560	Total sales for the year	8,816

Statistical information

Comparative table

	30/09/24 pence	Class 'B' Accumulation 30/09/23 pence	30/09/22 pence
Change in net assets per unit			
Opening net asset value per unit	119.32	136.47	212.48
Return before operating charges*	12.05	(17.06)	(75.92)
Operating charges	(0.10)	(0.09)	(0.09)
Return after operating charges*	11.95	(17.15)	(76.01)
Distributions on accumulation units	(4.09)	(3.63)	(3.31)
Retained distributions on accumulation units	4.09	3.63	3.31
Closing net asset value per unit	131.27	119.32	136.47
* after direct transaction costs of: ^	0.01	0.00	0.00

Performance

Return after charges	10.02%	(12.57%)	(35.77%)
----------------------	--------	----------	----------

Other information

Closing net asset value (£000)	31,019	30,404	34,149
Closing number of units	23,629,545	25,482,167	25,023,082
Operating charges	0.08%	0.07%	0.04%
Direct transaction costs	0.00%	0.00%	0.00%

Prices⁺

Highest unit price (pence)	139.21	153.44	240.95
Lowest unit price (pence)	114.89	114.42	114.02

^ The direct transaction costs includes commission on futures and clearing house fees on swaps.

+ High and low price disclosures are based on quoted unit prices. Therefore, the opening and closing NAV prices may fall outside the high/low price threshold.

Statistical information

Investment objective

The PUTM Bothwell Long Gilt Sterling Hedged Fund (the 'Fund') aims to provide a total return (a combination of capital growth and income) delivering this return in line with the benchmark before management fees and expenses.

The benchmark is the FTSE UK Conventional Gilts Over 15 Years Index (the "Index").

Investment policy

The Fund will aim to achieve this objective by investing at least 90% of the portfolio in long dated securities issued by the UK Government, that are constituents of the Index.

From time to time, the Fund may acquire or hold securities that are not constituents of the Index, as a result of new components entering the index, or existing components exiting the index.

Derivatives may be used for efficient portfolio management and hedging only.

Investment strategy

The Fund will seek to physically replicate the Index. This process will involve investing in components of the Index, though not necessarily in the same proportions of the Index at all times. Consequently, the Fund may not track the Index exactly but will contain a meaningful exposure to the market. Stock index futures contracts may also be used to manage the cash portion of the Fund. It is intended that the Fund will normally be close to fully invested as outlined above.

The Fund may also invest in other transferable securities, units in collective investment schemes and may hold up to 10% of its assets in money market instruments, deposits, cash and near cash. The Fund may use derivatives for efficient portfolio management only.

Revenue distribution and pricing

Units of the Fund are available as Class 'B' Accumulation units (where revenue is reinvested to enhance the unit price). There will be two potential distributions in each accounting year: an interim distribution as at 31 March and a final distribution as at 30 September.

At each distribution the net revenue after deduction of expenses, from the investments of the Fund, is apportioned amongst the unitholders. Unitholders receive a tax voucher giving details of the distribution and the Manager's Report no later than two months after these dates.

Statistical information

Risk and reward profile

The Risk and Reward Indicator table demonstrates where the Fund ranks in terms of its potential risk and reward. The higher the rank the greater the potential reward but the greater the risk of losing money. It is based on past data, may change over time and may not be a reliable indication of the future risk profile of the Fund. The shaded area in the table below shows the Fund's ranking on the Risk and Reward Indicator.

← Typically lower rewards, lower risk			Typically higher rewards, higher risk →			
1	2	3	4	5	6	7

This Fund is ranked at 6 (30/09/23: 6) because funds of this type have experienced medium to high rises and falls in value in the past. Although this is a high risk ranking it is not the highest. The above figure applies to the following unit class:

- Class 'B' Accumulation

Please note that even the lowest risk class can lose you money and that extreme market circumstances can mean you suffer severe losses in all cases. Please note the Fund's risk category may change in the future. The indicator does not take into account the following risks of investing in this Fund:

- Bonds are affected by changes in interest rates, inflation and any decline in creditworthiness of the bond issuer. Bonds that produce a higher level of income usually also carry greater risk as such bond issuers may have difficulty in paying their debts.
- Although the Investment Manager will use currency trades to reduce exchange rate risk on investments not priced in Sterling, this may not completely eliminate the Fund's exchange rate risk.
- Derivatives may be used for efficient portfolio management and hedging only.

For more information on the Risk and Reward profiles of our Funds, please refer to the most up to date relevant fund and Unit Class Key Investor Information Documents (KIIDs). These are available online at <https://www.thephoenixgroup.com/phoenix-unit-trust-managers/>

Annual financial statements

For the year ended 30 September 2024

Statement of total return

		30/09/24		30/09/23	
	Notes	£000	£000	£000	£000
Income					
Net capital gains/(losses)	4		1,976		(5,349)
Revenue	5	1,021		949	
Expenses	6	<u>(25)</u>		<u>(21)</u>	
Interest payable and similar charges		<u>–</u>		<u>(1)</u>	
Net revenue before taxation		996		927	
Taxation	7	<u>–</u>		<u>–</u>	
Net revenue after taxation			<u>996</u>		<u>927</u>
Total return/(deficit) before distributions			2,972		(4,422)
Distributions	8		(997)		(928)
Change in unitholders' funds from investment activities			<u>1,975</u>		<u>(5,350)</u>

Statement of change in unitholders' funds

		30/09/24		30/09/23	
		£000	£000	£000	£000
Opening net assets			30,404		34,149
Amounts receivable on issue of units		754		2,275	
Amounts payable on cancellation of units		<u>(3,095)</u>		<u>(1,598)</u>	
Change in unitholders' funds from investment activities			(2,341)		677
Retained distributions on accumulation units			1,975		(5,350)
			<u>981</u>		<u>928</u>
Closing net assets			<u>31,019</u>		<u>30,404</u>

Annual financial statements

As at 30 September 2024

Balance sheet

	Notes	£000	30/09/24 £000	£000	30/09/23 £000
Assets:					
Fixed assets:					
Investments			30,632		30,050
Current assets:					
Debtors	9	374		345	
Cash and bank balances	10	88		23	
Total current assets			462		368
Total assets			31,094		30,418
Liabilities:					
Creditors:					
Other creditors	11	(75)		(14)	
Total liabilities			(75)		(14)
Net assets			31,019		30,404
Unitholders' funds			31,019		30,404

Notes to the financial statements

Note 1 Accounting policies

(a) Basis of preparation

The financial statements have been prepared under the historical cost basis, as modified by the revaluation of investments and in compliance with Financial Reporting Standard (FRS 102) and in accordance with the Statement of Recommended Practice ('SORP') for Financial Statements of UK Authorised Funds issued by The Investment Association ('IA') in May 2014, and as amended in June 2017.

These financial statements are prepared on a going concern basis. The Manager has made an assessment of the Fund's ability to continue as a going concern, and is satisfied it has the resources to continue in business for the foreseeable future and is not aware of any material uncertainties that may cast significant doubt on this assessment. This assessment is made for a period of 12 months from when the financial statements are authorised for issue and considers liquidity, fluctuations in global capital markets, known redemption levels, expense projections and key service provider's operational resilience.

(b) Valuation of investments

The quoted investments of the Fund have been valued at bid dealing prices as at close of business on 30 September 2024, the last valuation point in the accounting year, in accordance with the Trust Deed.

Where these investments are managed by the Manager or an associate of the Manager, the holdings have been valued at the cancellation price for dual priced funds or the single price for single priced funds. This price is the last available published price at the year end.

(c) Foreign exchange

Transactions in foreign currencies during the year are translated into Sterling (the functional currency of the Fund), at the rates of exchange ruling on the transaction date. Amounts held in foreign currencies have been translated at the rate of exchange ruling at close of business on 30 September 2024, the last valuation point in the accounting year.

(d) Revenue

Interest receivable on bank deposits is accounted for on a receipts basis and money market funds is accounted for on an accruals basis. Interest receivable from debt securities is accounted for on an effective interest rate basis. Accrued interest purchased or sold is excluded from the cost of the security and is accounted for as revenue.

Interest received from or paid to the Fund from over-the-counter derivatives designed to protect income is treated as revenue.

(e) Expenses

Expenses are accounted for on an accruals basis. Expenses of the Fund are charged against revenue, except for the costs associated with the purchase and sale of investments, which are charged to capital.

(f) Taxation

The Fund satisfied the rules of SI 2006/964, Reg 19 throughout the period. All distributions made are therefore made as interest distributions. The Fund has no corporate tax liability as interest distributions are tax deductible.

Notes to the financial statements

Note 1 Accounting policies (continued)

(g) Deferred taxation

Deferred tax is provided at current rates of corporation tax on all timing differences which have originated but not reversed by the Balance sheet date. Deferred tax is not recognised on permanent differences.

Deferred tax assets are recognised only to the extent that the Manager considers it is more likely than not that there will be taxable profits from which underlying timing differences can be deducted.

Note 2 Distribution policies

(a) Basis of distribution

Revenue produced by the Fund's investments accumulates during each accounting period. If, at the end of each accounting period, revenue exceeds expenses, the net revenue of the Fund is available to be accumulated to unitholders.

The Fund is more than 60% invested in qualifying investments (as defined by SI 2006/964, Reg 20) and will pay an interest distribution.

(b) Unclaimed distributions

Distributions remaining unclaimed after six years are paid into the Fund as part of the capital property.

(c) Interest from debt securities

Future cash flows on all assets are considered when calculating revenue on an effective interest rate basis and where, in the Manager's view there is doubt as to the final maturity value, an estimate of the final redemption proceeds will be made in determining those cash flows. The impact of this will be to reduce the revenue from debt securities, and therefore the revenue distributed, whilst preserving capital within the Fund.

(d) Expenses

In determining the net revenue available for distribution, charges in relation to the safe custody of investments are ultimately borne by capital.

Note 3 Risk management policies

The risks arising from the Fund's financial instruments are market price risk, interest rate risk, liquidity risk, credit risk and counterparty risk. The Manager's policies for managing these risks are summarised below and have been applied throughout the year.

(a) Market price risk

Market price risk arises mainly from uncertainty about future prices of financial instruments held. It represents the potential loss the Fund might suffer through holding market positions in the face of price movements. The Fund's investment portfolio is exposed to market fluctuations which are monitored by the Manager in pursuit of the investment objectives and policies. Adherence to investment guidelines and to investment and borrowing powers set out in the Trust Deed, the Prospectus and in the Collective Investment Schemes Sourcebook ("the Sourcebook") mitigates the risk of excessive exposure to any particular type of security or issuer.

Notes to the financial statements

Note 3 Risk management policies (continued)

(b) Interest rate risk

The Fund's assets are comprised of mainly fixed interest rate securities. There is therefore a risk that the capital value of investments will vary as a result of the market's sentiment regarding future interest rates.

Expectations of future rates may result in an increase or decrease in the value of investments held. In general, if interest rates rise the revenue potential of the Fund also rises but the value of fixed interest rate securities will decline. A decline in interest rates will in general have the opposite effect.

Any transactions in fixed interest securities must be used in accordance with the investment objective of the Fund and must be deemed by the Investment Manager to be economically appropriate. Regular production of portfolio risk reports highlight concentrations of risk, including interest rate risk, for this Fund. Interest receivable on bank deposits or payable on bank overdraft positions will be affected by fluctuations in interest rates.

(c) Liquidity risk

The Fund's assets are comprised of mainly readily realisable securities. If insufficient cash is available to finance unitholder redemptions then securities held by the Fund may need to be sold. The risk of low market liquidity, through reduced trading volumes, may affect the ability of the Fund to trade financial instruments at values previously indicated by financial brokers. From time to time, liquidity may also be affected by stock specific or economic events. To manage these risks the Manager performs market research in order to achieve the best price for any transactions entered into on behalf of the Fund. All stocks are valued daily but those stocks identified as being less liquid are reviewed on a regular basis for pricing accuracy.

(d) Credit risk

At the Balance sheet date 98.75% (30/09/23: 98.84%) of the Fund's assets were held in government bonds. Government bonds involve the risk that the bond issuer will be unable to meet its liability to pay interest or redeem the bond. The Fund Manager selects bonds taking into account the credit rating, bearing in mind the Fund's objective.

(e) Counterparty risk

Certain transactions in securities that the Fund enters into expose it to the risk that the counterparty will not deliver the investment (purchase) or cash (sale) after the Fund has fulfilled its responsibilities. The Fund only buys and sells investments through brokers which have been approved by the Manager as an acceptable counterparty. This list is reviewed annually.

(f) Derivatives

Derivatives may be used for efficient portfolio management and hedging only. In doing so the Manager may make use of a variety of derivative instruments in accordance with the Sourcebook. Where derivatives are used for hedging this will not compromise the risk profile of the Fund. Use of derivatives will not knowingly contravene any relevant investment objective or limits.

Notes to the financial statements

Note 4 Net capital gains/(losses)

The net capital gains/(losses) during the year comprise:

	30/09/24	30/09/23
	£000	£000
Gains/(losses) on non-derivative securities	1,978	(5,348)
(Losses)/gains on derivative contracts	(2)	–
Handling charges	–	(1)
Net capital gains/(losses)	<u>1,976</u>	<u>(5,349)</u>

Note 5 Revenue

	30/09/24	30/09/23
	£000	£000
Interest on debt securities	1,021	949
Total revenue	<u>1,021</u>	<u>949</u>

Note 6 Expenses

	30/09/24	30/09/23
	£000	£000
(a) Payable to the Manager or associates of the Manager and agents of either of them: Manager's periodic charge	<u>2</u>	<u>2</u>
(b) Payable to the Trustee or associates of the Trustee and agents of either of them: Trustee's fees	<u>1</u>	<u>1</u>
(c) Other expenses: Audit fee	13	10
Safe custody charges	1	1
Printing & stationery	1	1
FTSE licence fees	2	5
Professional fees	5	1
	<u>22</u>	<u>18</u>
Total expenses	<u>25</u>	<u>21</u>

Notes to the financial statements

Note 7 Taxation	30/09/24 £000	30/09/23 £000
(a) Analysis of tax charge for the year		
Total taxation (Note 7(b))	—	—
(b) Factors affecting the tax charge for the year		
The tax assessed differs from that calculated when the standard rate of corporation tax for Authorised Unit Trusts is applied to total revenue return. The differences are explained below:		
Net revenue before taxation	996	927
Corporation tax at 20% (30/09/23: 20%)	199	185
Effects of:		
Deductible interest distributions	(199)	(185)
Total tax charge for the year (Note 7(a))	—	—

Authorised Unit Trusts are exempt from tax on capital gains in the UK.

(c) Provision for deferred taxation	
No deferred tax asset has been recognised in the year or the prior year.	

Note 8 Distributions

The distributions take account of amounts added on the issue of units and amounts deducted on the cancellation of units, and comprise:

	30/09/24 £000	30/09/23 £000
Interim	486	454
Final	495	474
	981	928
Amounts deducted on cancellation of units	21	13
Amounts added on issue of units	(5)	(13)
Net distribution for the year	997	928
Net revenue after taxation	996	927
Expenses taken to capital	1	1
Net distribution for the year	997	928

Details of the distribution per unit are set out in the tables on page 20.

Note 9 Debtors	30/09/24 £000	30/09/23 £000
Creations awaiting settlement	50	35
Accrued income	324	310
Total debtors	374	345

Note 10 Cash and bank balances	30/09/24 £000	30/09/23 £000
Cash and bank balances	88	23
Total cash and bank balances	88	23

Notes to the financial statements

Note 11 Other creditors

	30/09/24	30/09/23
	£000	£000
Cancellations awaiting settlement	–	2
Purchases awaiting settlement	61	–
Trustee's fees payable	1	1
Audit fee payable	12	10
FCA fee payable	1	–
Handling charges payable	–	1
Total other creditors	<u>75</u>	<u>14</u>

Note 12 Reconciliation of units

	Class 'B' Accumulation
Opening units issued at 01/10/23	25,482,167
Unit movements in year:	
Units issued	601,452
Units cancelled	<u>(2,454,074)</u>
Closing units at 30/09/24	<u>23,629,545</u>

Note 13 Contingencies and commitments

At 30 September 2024 the Fund had no outstanding calls on partly paid shares, no potential underwriting commitments or any other contingent liabilities (30/09/23: £nil).

Note 14 Related party transactions

The Manager, Phoenix Unit Trust Managers Limited (PUTM) is a related party due to PUTM acting as key management personnel to the Fund and is regarded as a controlling party by virtue of having the ability to act in respect of operation of the Fund.

The Manager is part of the Phoenix Group. Phoenix Life Limited which is also part of the Phoenix Group, is a material unitholder in the Fund and therefore a related party, holding 100% of the unit at the year end (30/09/23: 100%).

The Manager's periodic charge paid to the Manager, Phoenix Unit Trust Managers Limited, or its associates, is shown in Note 6(a) and details of the units issued and cancelled by the Manager are shown in the Statement of change in unitholders' funds and Note 8.

Any balances due to/from the Manager or its associates at the current and prior year end in respect of these transactions are shown in Notes 9 and 11.

Note 15 Financial instruments

In accordance with the investment objective, the Fund holds certain financial instruments. These comprise:

- securities held in accordance with the investment objective and policies;
- derivative transactions which the Fund may also enter into, the purpose of which is to manage the currency and market risks arising from the Fund's investment activities; and
- cash and short term debtors and creditors arising directly from operations.

Counterparty exposure

There was no counterparty exposure held at the year end (2023: nil).

Currency exposure

There was no currency exposure at the current or prior year end.

Notes to the financial statements

Note 15 Financial instruments (continued)

Interest profile

The interest rate risk profile of financial assets and liabilities at 30 September 2024 was:

Currency	Fixed rate financial assets £000	Floating rate financial assets £000	Financial assets not carrying interest £000	Total £000
Sterling	30,632	88	374	31,094
	<u>30,632</u>	<u>88</u>	<u>374</u>	<u>31,094</u>

Currency	Floating rate financial liabilities £000	Financial liabilities not carrying interest £000	Total £000
Sterling	–	(75)	(75)
	<u>–</u>	<u>(75)</u>	<u>(75)</u>

The interest rate risk profile of financial assets and liabilities at 30 September 2023 was:

Currency	Fixed rate financial assets £000	Floating rate financial assets £000	Financial assets not carrying interest £000	Total £000
Sterling	30,050	23	345	30,418
	<u>30,050</u>	<u>23</u>	<u>345</u>	<u>30,418</u>

Currency	Floating rate financial liabilities £000	Financial liabilities not carrying interest £000	Total £000
Sterling	–	(14)	(14)
	<u>–</u>	<u>(14)</u>	<u>(14)</u>

Interest rates earned/paid on deposits are earned/paid at a rate linked to SONIA (Sterling Overnight Index Average) or international equivalent. Interest was also earned on the investments in the Aberdeen Standard Liquidity Fund.

Credit Ratings	31/08/24		31/08/23	
	£000	%	£000	%
Investment grade	<u>30,632</u>	100.00	<u>10,503</u>	100.00
Total investment in bonds	<u>30,632</u>	100.00	<u>10,503</u>	100.00

Sensitivity analysis

Interest rate risk sensitivity

Changes in interest rates or changes in expectation of future interest rates may result in the market value of the investments held. A one percent increase in interest rates (based on current parameters used by the Manager's Investment Risk department) would have the effect of decreasing the return and net assets by £5,127,441 (30/09/23: £4,842,422). A one percent decrease would have an equal and opposite effect.

Foreign currency risk sensitivity

As the majority of the Fund's financial assets are in the base currency of the Fund (Sterling), the Fund is only subject to limited exposure to fluctuations in foreign currency and therefore, no sensitivity analysis has been provided.

Notes to the financial statements

Note 15 Financial instruments (continued)

Market price risk sensitivity

A five percent increase in the value of the Fund's portfolio would have the effect of increasing the return and net assets by £1,531,593 (30/09/23: £1,502,489). A five percent decrease would have an equal and opposite effect.

Note 16 Fair value of investments

The fair value of the Fund's investments has been determined using the hierarchy below.

This complies with the 'Amendments to FRS 102 – Fair value hierarchy disclosures' issued by the Financial Reporting Council in September 2024.

Level 1 The unadjusted quoted price in an active market for identical assets or liabilities that the entity can access at the measurement date.

Level 2 Inputs other than quoted prices included within Level 1 that are observable (i.e. developed using market data) for the asset or liability, either directly or indirectly.

Level 3 Inputs are unobservable (i.e. for which market data is unavailable) for the asset or liability.

For the year ended 30/09/24

Level	1	2	3	Total
Investment assets	£000	£000	£000	£000
Bonds	30,632	–	–	30,632
	30,632	–	–	30,632

For the year ended 30/09/23

Level	1	2	3	Total
Investment assets	£000	£000	£000	£000
Bonds	30,050	–	–	30,050
	30,050	–	–	30,050

Note 17 Portfolio transaction costs

For the year ended 30/09/24

	Value	Commission		Taxes	Other		Total
Analysis of total purchases costs	£000	£000	%	£000	£000	%	£000
Bond transactions	7,560	–	–	–	–	–	7,560
Total	7,560	–	–	–	–	–	7,560

	Value	Commission		Taxes	Other		Total
Analysis of total sales costs	£000	£000	%	£000	£000	%	£000
Bond transactions	8,816	–	–	–	–	–	8,816
Total	8,816	–	–	–	–	–	8,816

The Fund has paid £1,732 as commission on purchases and sales of derivatives transactions for the year ended 30.09.24.

Commission, taxes and other expenses as % of average net assets:

Commission	0.00%
Taxes	0.00%
Other expenses	0.00%

Notes to the financial statements

Note 17 Portfolio transaction costs (continued)

For the year ended 30/09/23

	Value	Commission		Taxes		Other		Total
Analysis of total purchases costs	£000	£000	%	£000	%	Expenses	%	costs
						£000		£000
Bond transactions	5,219	–	–	–	–	–	–	5,219
Money markets	247	–	–	–	–	–	–	247
Total	<u>5,466</u>	<u>–</u>		<u>–</u>		<u>–</u>		<u>5,466</u>

	Value	Commission		Taxes		Other		Total
Analysis of total sales costs	£000	£000	%	£000	%	Expenses	%	costs
						£000		£000
Bond transactions	3,429	–	–	–	–	–	–	3,429
Money markets	294	–	–	–	–	–	–	294
Total	<u>3,723</u>	<u>–</u>		<u>–</u>		<u>–</u>		<u>3,723</u>

The Fund has paid £nil as commission on purchases and sales of derivatives transactions for the year ended 30.09.23.

Commission, taxes and other expenses as % of average net assets:

Commission	0.00%
Taxes	0.00%
Other expenses	0.00%

The purchases and sales of securities incurred no direct transaction costs during the year or prior year.

Portfolio transaction costs are incurred by the Fund when buying and selling underlying investments. These costs vary depending on the class of investment, country of exchange and method of execution.

These costs can be classified as either direct or indirect transaction costs:

Direct transaction costs: Broker commissions, fees and taxes.

Indirect transaction costs: "Dealing spread" - the difference between buying and selling prices of the underlying investments.

At the Balance sheet date the portfolio dealing spread was 0.07% (30/09/23: 0.11%) being the difference between the respective bid and offer prices for the Fund's investments.

Distribution tables

For the year ended 30 September 2024

Interest distributions

Interim distribution in pence per unit

Group 1: units purchased prior to 01 October 2023

Group 2: units purchased 01 October 2023 to 31 March 2024

	Gross income	Equalisation	2024 pence per unit paid 31 May	2023 pence per unit paid 31 May
Class 'B' Accumulation				
Group 1	1.9905	—	1.9905	1.7675
Group 2	1.4813	0.5092	1.9905	1.7675

Final distribution in pence per unit

Group 1: units purchased prior to 1 April 2024

Group 2: units purchased 1 April 2024 to 30 September 2024

	Gross income	Equalisation	2024 pence per unit payable 30 Nov	2023 pence per unit paid 30 Nov
Class 'B' Accumulation				
Group 1	2.0955	—	2.0955	1.8613
Group 2	1.1058	0.9897	2.0955	1.8613

Equalisation

This applies only to units purchased during the distribution period (Group 2 units). It is the average amount of revenue included in the purchase price of all Group 2 units and is refunded to the holders of these units as a return of capital. Being capital it is not liable to income tax but must be deducted from the cost of the units for capital gains tax purposes.

Responsibilities of the manager and the trustee

- a) The Collective Investment Schemes sourcebook published by the FCA, (“the COLL Rules”) require the Manager to prepare financial statements for each annual and interim accounting period which give a true and fair view of the financial position of the Fund and of the net revenue and the net capital gains on the property of the Fund for the year.

In preparing these accounts, the Manager is responsible for:

- selecting suitable accounting policies and then applying them consistently;
- making judgements and estimates that are reasonable and prudent;
- following UK accounting standards, including FRS 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland;
- complying with the disclosure requirements of the Statement of Recommended Practice for UK Authorised Funds issued by the Investment Management Association in May 2014;
- keeping proper accounting records which enable it to demonstrate that the financial statements as prepared comply with the above requirements;
- assessing the Fund’s ability to continue as a going concern, disclosing, as applicable, matters related to going concern;
- using the going concern basis of accounting unless they either intend to liquidate the Fund or to cease operations, or have no realistic alternative but to do so;
- such internal control as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error; and
- taking reasonable steps for the prevention and detection of fraud and irregularities.

The Manager is responsible for the management of the Fund in accordance with its Trust Deed, the Prospectus and the COLL Rules.

The Manager is responsible for the maintenance and integrity of the corporate and financial information included on its website. Legislation in the UK governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

- b) The Depositary in its capacity as Trustee of the PUTM Bothwell Long Gilt Sterling Hedged Fund must ensure that the Trust is managed in accordance with the Financial Conduct Authority’s Collective Investment Schemes Sourcebook, the Financial Services and Markets Act 2000, as amended, (together “the Regulations”), the Trust Deed and Prospectus (together “the Scheme documents”) as detailed below.

The Depositary must in the context of its role act honestly, fairly, professionally, independently and in the interests of the Trust and its investors.

The Depositary is responsible for the safekeeping of all custodial assets and maintaining a record of all other assets of the Trust in accordance with the Regulations.

The Depositary must ensure that:

- the Trust’s cash flows are properly monitored and that cash of the Trust is booked in cash accounts in accordance with the Regulations;
- the sale, issue, repurchase, redemption and cancellation of units are carried out in accordance with the Regulations;
- the value of units of the Trust are calculated in accordance with the Regulations;
- any consideration relating to transactions in the Trust’s assets is remitted to the Trust within the usual time limits;
- the Trust’s income is applied in accordance with the Regulations; and
- the instructions of the Authorised Fund Manager (“the AFM”), which is the UCITS Management Company, are carried out (unless they conflict with the Regulations).

The Depositary also has a duty to take reasonable care to ensure that the Trust is managed in accordance with the Regulations and the Scheme documents of the Trust in relation to the investment and borrowing powers applicable to the Trust.

Trustee's report and directors' statement

Statement of the Depositary's Responsibilities in Respect of the Scheme and Report of the Depositary to the Unitholders of the PUTM Bothwell Long Gilt Sterling Hedged Fund of the PUTM Bothwell Range of Unit Trusts ("the Trust") for the Period Ended 30 September 2024

Having carried out such procedures as we considered necessary to discharge our responsibilities as Depositary of the Trust, it is our opinion, based on the information available to us and the explanations provided, that, in all material respects the Trust, acting through the AFM:

- (i) has carried out the issue, sale, redemption and cancellation, and calculation of the price of the Trust's units and the application of the Trust's income in accordance with the Regulations and the Scheme documents of the Trust; and
- (ii) has observed the investment and borrowing powers and restrictions applicable to the Trust in accordance with the Regulations and the Scheme documents of the Trust.

London
23 January 2025

HSBC Bank plc

Directors' statement

In accordance with the requirements of the Collective Investment Schemes Sourcebook as issued and amended by the Financial Conduct Authority, we hereby certify the report on behalf of the Directors of Phoenix Unit Trust Managers Limited.

Birmingham
23 January 2025

Michael Eakins, Director
Frances Clare Maclachlan, Director

Independent auditor's report to the unitholders of the PUTM Bothwell Long Gilt Sterling Hedged Fund

Opinion

We have audited the financial statements of PUTM Bothwell Long Gilt Sterling Hedged Fund ("the Fund") for the year ended 30 September 2024 which comprise the Statement of total return, the Statement of Change in Unitholders' Funds, the Balance sheet, the Related notes and Distribution table for the Fund and the accounting policies set out on pages 11 to 12.

In our opinion, the financial statements:

- give a true and fair view, in accordance with UK accounting standards, including FRS 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland, of the financial position of the Fund as at 30 September 2024 and of the net revenue and the net capital gains on the property of the Fund for the year then ended; and
- have been properly prepared in accordance with the Trust Deed, the Statement of Recommended Practice relating to Authorised Funds, and the COLL Rules.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) ("ISAs (UK)") and applicable law. Our responsibilities are described below. We have fulfilled our ethical responsibilities under, and are independent of the Fund in accordance with, UK ethical requirements including the FRC Ethical Standard.

We have received all the information and explanations which we consider necessary for the purposes of our audit and we believe that the audit evidence we have obtained is a sufficient and appropriate basis for our opinion.

Going Concern

The Manager has prepared the financial statements on the going concern basis as they do not intend to liquidate the Fund or to cease their operations, and as they have concluded that the Fund's financial position means that this is realistic. They have also concluded that there are no material uncertainties that could have cast significant doubt over their ability to continue as a going concern for at least a year from the date of approval of the financial statements ("the going concern period").

In our evaluation of the Manager's conclusions, we considered the inherent risks to the Fund's business model and analysed how those risks might affect the Fund's financial resources or ability to continue operations over the going concern period.

Our conclusions based on this work:

- we consider that the Manager's use of the going concern basis of accounting in the preparation of the financial statements is appropriate;
- we have not identified, and concur with the Manager's assessment that there is not, a material uncertainty related to events or conditions that, individually or collectively, may cast significant doubt on the Fund's ability to continue as a going concern for the going concern period.

However, as we cannot predict all future events or conditions and as subsequent events may result in outcomes that are inconsistent with judgements that were reasonable at the time they were made, the above conclusions are not a guarantee that the Fund will continue in operation.

Fraud and breaches of laws and regulations - ability to detect

Identifying and responding to risks of material misstatement due to fraud

To identify risks of material misstatement due to fraud ("fraud risks") we assessed events or conditions that could indicate an incentive or pressure to commit fraud or provide an opportunity to commit fraud. Our risk assessment procedures included:

- Enquiring of Directors as to the Fund's high-level policies and procedures to prevent and detect fraud, as well as whether they have knowledge of any actual, suspected or alleged fraud;
- Assessing the segregation of duties in place between the Manager, the Trustee, the Administrator and the Investment Adviser; and
- Reading board minutes.

As required by auditing standards, we perform procedures to address the risk of management override of controls, in particular the risk that management may be in a position to make inappropriate accounting entries. On this audit we do not

Independent auditor's report to the unitholders of the PUTM Bothwell Long Gilt Sterling Hedged Fund

believe there is a fraud risk related to revenue recognition because the revenue is principally non-judgemental and based on publicly available information, with limited opportunity for manipulation. We did not identify any additional fraud risks.

We evaluated the design and implementation of the controls over journal entries and other adjustments and made inquiries of the Administrator about inappropriate or unusual activity relating to the processing of journal entries and other adjustments. We identified and selected a sample of journal entries made at the end of the reporting period and tested those substantively including all material post-closing entries. Based on the results of our risk assessment procedures and understanding of the process, including the segregation of duties between the Directors and the Administrator, no further high-risk journal entries or other adjustments were identified.

Identifying and responding to risks of material misstatement due to fraud

We identified areas of laws and regulations that could reasonably be expected to have a material effect on the financial statements from our general commercial and sector experience and through discussion with the Manager and the Administrator (as required by auditing standards) and discussed with the Directors the policies and procedures regarding compliance with laws and regulations.

The potential effect of these laws and regulations on the financial statements varies considerably.

Firstly, the Fund is subject to laws and regulations that directly affect the financial statements including financial reporting legislation (including related authorised fund legislation maintained by the Financial Conduct Authority) and taxation legislation and we assessed the extent of compliance with these laws and regulations as part of our procedures on the related financial statement items.

Secondly, the Fund is subject to many other laws and regulations where the consequences of non-compliance could have a material effect on amounts or disclosures in the financial statements, for instance through the imposition of fines or litigation. We identified the following areas as those most likely to have such an effect: money laundering, data protection and bribery and corruption legislation recognising the Fund's activities. Auditing standards limit the required audit procedures to identify non-compliance with these laws and regulations to enquiry of the Directors and the Administrator and inspection of regulatory and legal correspondence, if any. Therefore if a breach of operational regulations is not disclosed to us or evident from relevant correspondence, an audit will not detect that breach.

Context of the ability of the audit to detect fraud or breaches of law or regulation

Owing to the inherent limitations of an audit, there is an unavoidable risk that we may not have detected some material misstatements in the financial statements, even though we have properly planned and performed our audit in accordance with auditing standards. For example, the further removed non-compliance with laws and regulations is from the events and transactions reflected in the financial statements, the less likely the inherently limited procedures required by auditing standards would identify it.

In addition, as with any audit, there remained a higher risk of non-detection of fraud, as these may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal controls. Our audit procedures are designed to detect material misstatement. We are not responsible for preventing non-compliance or fraud and cannot be expected to detect non-compliance with all laws and regulations.

Other information

The Manager is responsible for the other information presented in the Annual Report together with the financial statements. Our opinion on the financial statements does not cover the other information and, accordingly, we do not express an audit opinion or, except as explicitly stated below, any form of assurance conclusion thereon.

Our responsibility is to read the other information and, in doing so, consider whether, based on our financial statements audit work, the information therein is materially misstated or inconsistent with the financial statements or our audit knowledge. Based solely on that work:

- we have not identified material misstatements in the other information; and
- in our opinion the information given in the Manager's Report for the financial year is consistent with the financial statements.

Independent auditor's report to the unitholders of the PUTM Bothwell Long Gilt Sterling Hedged Fund

Matters on which we are required to report by exception

We have nothing to report in respect of the following matters where under the COLL Rules we are required to report to you if, in our opinion:

- proper accounting records for the Fund have not been kept; or
- the financial statements are not in agreement with the accounting records.

Manager's responsibilities

As explained more fully in its statement set out on page 21, the Manager is responsible for: the preparation of financial statements that give a true and fair view; such internal control as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error; assessing the Fund's ability to continue as a going concern, disclosing, as applicable, matters related to going concern; and using the going concern basis of accounting unless they either intend to liquidate the Fund or to cease operations, or have no realistic alternative but to do so.

Auditor's responsibilities

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue our opinion in an auditor's report. Reasonable assurance is a high level of assurance, but does not guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

A fuller description of our responsibilities is provided on the FRC's website at www.frc.org.uk/auditorsresponsibilities.

The purpose of our audit work and to whom we owe our responsibilities

This report is made solely to the Fund's unitholders, as a body, in accordance with Rule 4.5.12 of the Collective Investment Schemes sourcebook ('the COLL Rules') issued by the Financial Conduct Authority under section 247 of the Financial Services and Markets Act 2000. Our audit work has been undertaken so that we might state to the Fund's unitholders those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Fund and the Fund's unitholders as a body, for our audit work, for this report, or for the opinions we have formed.

Grant Archer for and on behalf of KPMG LLP, Statutory Auditor

Chartered Accountants
319 St Vincent Street
Glasgow
G2 5AS

23 January 2025

Corporate information (unaudited)

The information in this report is designed to enable unitholders to make an informed judgement on the activities of the Fund during the period it covers and the results of those activities at the end of the period.

Phoenix Unit Trust Managers Limited is part of the Phoenix Group.

Unit prices appear daily on our website www.phoenixunittrust.co.uk.

Administration & Dealing: 0345 584 2803 (between the hours of 9am & 5pm).

Remuneration

The Manager has adopted a remuneration policy, up-to-date details of which can be found on www.phoenixunittrust.co.uk. This statement describes how remuneration and benefits are calculated and identifies the committee which oversees and controls this policy. A paper copy of these details can be requested free of charge from the Manager.

This statement fulfils Phoenix Unit Trust Managers Limited's ('the Manager') obligations as an authorised UK UCITS Manager in respect of compliance with the UCITS V Remuneration Code and contains relevant remuneration disclosures.

PUTM Unit Trusts are managed by Phoenix Unit Trust Managers Limited, which is a subsidiary of Phoenix Life Limited, part of The Phoenix Group plc ('the Group').

The Remuneration Committee ('the Committee') of the Group has established a Remuneration Policy which applies to all entities of the Group. The guiding principles of this policy ensure sound and effective risk management so as not to encourage risk-taking outside of the Group's risk appetite, and support management in the operation of their business through identification of minimum control standards and key controls. The Committee approves the list of UK UCITS Code Staff annually and identified UK UCITS Code Staff are annually notified of their status and the associated implications.

Further information on the Group Remuneration Policy can be found in the Group annual reports and accounts which can be found on www.phoenixgroup.com.

The below table provides detail of remuneration provided, split between fixed and variable remuneration, for UK UCITS Code Staff (defined as all staff whose professional activities have material impact on the risk profiles of the fund it manages).

As at 31 December 2023

	Headcount	Total remuneration
Phoenix Unit Trust Managers	2	113,487.36
of which		
Fixed Remuneration	2	71,167.36
Variable Remuneration	1	42,320.00
Carried Interest	n/a	
Highest paid Director's Remuneration		44,005.66

The Directors are employed by fellow entities of the Group. The total compensation paid to the Directors of the Manager is in respect of services to the Manager, irrespective of which entity within the Phoenix Group has paid the compensation.

Please note that due to the employment structure and resourcing practices of the Group, the staff indicated in this table may also provide services to other companies in the Group.

Corporate information (unaudited)

The table states the actual number of employees who are fully or partly involved in the activities of the Manager, no attempt has been made to apportion the time spent specifically in support of each fund as this data is not captured as part of the Manager's normal processes.

The remuneration disclosed is the total remuneration for the year and has been apportioned between the provisions of services to the Manager and not the Fund.

Total remuneration can include any of the following;

- Fixed pay and annual/long term incentive bonuses.
- Where fixed pay is directly attributable to PUTM Unit Trusts (for example, fees for Phoenix Unit Trust Managers Limited), 100% of those fees.
- For other individuals, pro-rated using the average AUM of PUTM Unit Trusts (as a proportion of the aggregate average AUM of The Phoenix Group plc) as proxy.

Senior Management includes – PUTM Board and PUTM Executive Committees.

Other Code Staff includes all other UK UCITS Code Staff not covered by the above.

Assessment of Value

We are required to perform an annual assessment of the value for money for each unit class of PUTM Bothwell Long Gilt Sterling Hedged Fund. This has been performed based on the information available as at 30 September 2024.

We have performed this review having regard to a wide range of factors. In doing so, we have made comparison with the other unit classes of the relevant fund, with the unit classes and sub-funds within our fund ranges and also with comparable unit classes and sub-funds in the rest of the market.

Broadly speaking, assessment of value requires consideration of a combination of factors, including the return achieved, the price paid, the risk taken and the quality and range of services provided by the asset manager. This also needs to be considered in the context of the investment objectives and policy for the Fund, the target investor and the recommended holding period.

In considering cost, regard needs to be had to the total cost of investing, including any adviser charges, platform charges, adviser fees and the on-going annual management charge. Regard also needs to be had to the degree of active management; as an investor, you would not be receiving value, if you were being charged fees for active portfolio management, where in fact, the Fund's composition of performance is staying very close to a benchmark. These factors also need to be considered in the context of the size of the portfolio and the ability of larger funds to benefit from economies of scale. As regards performance, it is important that performance is considered over an appropriate timescale given the Fund's objectives, and should be measured net of fees.

Based on our assessment of the value of each unit class, PUTM can confirm that the Fund meets all of the required Assessment of Value criteria. No immediate action is required.

Further details of the Assessment of Value can be found at the following link:

<http://www.phoenixunittrust.co.uk/report-and-accounts.aspx>

Fund Climate Report

We're working towards a more sustainable way of investing. For the latest information about what we're doing and our fund climate report, go to <https://www.thephoenixgroup.com/phoenix-unit-trust-managers/>.

Risks

The price of units and the revenue from them can go down as well as up and investors may not get back the amount they invested, particularly in the case of early withdrawal. Tax levels and reliefs are those currently applicable and may change. The value of any tax relief depends on personal circumstances.

Management charges on some funds are charged to capital and therefore a reduction in capital may occur.

Depending on the fund, the value of your investment may change with currency movements.

Corporate information (unaudited)

Manager

Phoenix Unit Trust Managers Limited (PUTM)
1 Wythall Green Way
Wythall
Birmingham
West Midlands B47 6WG
Tel: 0345 584 2803
Registered in England – No.03588031
Authorised and regulated by the Financial Conduct Authority.

Directors

Michael Eakins

(appointed 29 April 2024)

PUTM Director, Group Chief
Investment Officer;

Frances Clare MacLachlan

(appointed 19 April 2024)

PUTM Director, Chief
Finance Officer SLF UK,
Sun Life of Canada;

Craig Baker

(resigned 28 April 2024)

PUTM Director, Head of
Policyholder Assets;

Brid Meany

(resigned 19 April 2024)

PUTM Director, Chief
Executive Phoenix Life;

Timothy Harris

Non Executive Director of
PUTM;

Nick Poyntz-Wright

Non Executive Director of
PUTM;

Ian Craston

(appointed 19 September
2023)

Non Executive Director of
PUTM.

Registrar and correspondence address

Phoenix Unit Trust Managers Limited
Floor 1, 1 Grand Canal Square
Grand Canal Harbour
Dublin 2
Ireland
Authorised and regulated by the Financial Conduct Authority.

Investment Adviser

Abrdn Investment Management Limited
1 George Street
Edinburgh EH2 2LL
Registered in Scotland – No.SC123321
Authorised and regulated by the Financial Conduct Authority.

Trustee

HSBC Bank plc
1-2 Lochside Way
Edinburgh Park
Edinburgh EH12 9DT
Authorised by the Prudential Regulation Authority
and regulated by the Financial Conduct Authority and the
Prudential Regulation Authority.

Independent Auditor

KPMG LLP
319 St. Vincent Street,
Glasgow
G2 5AS

Authorised status

This Fund is an Authorised Unit Trust scheme under
section 243 of the Financial Services & Markets Act
2000 and is categorised under the Collective Investment
Schemes Sourcebook as a UK UCITS fund.

Notes

Notes

Contact: **Client Services**

Call: **0345 584 2803**

Correspondence Address: **Floor 1, 1 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland**

Visit: **phoenixunittrust.co.uk**

Telephone calls may be monitored and/or recorded for the purposes of security, internal training, accurate account operation, internal customer monitoring and to improve the quality of service.

Please note the Key Investor Information Document (KIID), the Supplementary Information Document (SID) and the full prospectus are available free of charge. These are available by contacting Client Services on 0345 584 2803.

Phoenix Unit Trust Managers Limited does not accept liability for any claims or losses of any nature arising directly or indirectly from use of the data or material in this report. The information supplied is not intended to constitute investment, tax, legal or other advice.

Phoenix Unit Trust Managers Limited* is a Phoenix Group Company. Registered in England No 3588031.
Registered office: 1 Wythall Green Way, Wythall, Birmingham B47 6WG.

*Authorised and regulated by the Financial Conduct Authority.