

# EMBARK INVESTMENTS LIMITED

ANNUAL ASSESSMENT OF VALUE  
YEAR ENDING 31 MAY 2021

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## CEO REPORT

Welcome to our latest Assessment of Value report.

This report summarises the Board of Directors' evaluation of the value offered to investors in the five Horizon Multi-Asset Sub-funds and the respective share classes. We have done this by measuring ourselves against various criteria, such as our service levels, performance and costs, and laying out the results in plain English. These criteria were set by our regulator, the Financial Conduct Authority (FCA).

Of course, the concept of value means different things to different investors. For some, it is a straight-forward question of the investment outcome in relation to the costs. Others see value in terms of a fund manager's investment philosophy, or approach to responsible investing.

However you consider it, we hope the following report is clear and fair and gives you a good understanding of why the award-winning\* Horizon Multi-Asset Fund range continues to provide excellent value to investors through strong long-term performance results, robust management and oversight.

### Introduction

As an investor in our Horizon Multi-Asset Fund range, you may know us as Embark Investments. This is a trading name of Embark Investments Limited (Embark Investments) and this is the entity that is authorised and regulated by the FCA.

Embark Investments is also the Authorised Corporate Director (ACD) of the five Horizon Sub-funds, meaning we organise and oversee everything to do with the management of the Sub-funds, ensuring that they are being run as our investors expect.

The Horizon Multi-Asset Fund range is a unique investment solution, designed to evolve with changing markets and times. Each of the five Sub-funds is risk profiled, so they can be matched to an investor's specific investment needs and risk appetite.

The Sub-funds are actively managed and offer a blend of expertise with three independent layers. They benefit from forward-looking strategic asset allocations, by risk profile, determined by EV (EValue). Tactical fund allocations and security selection are set by Columbia Threadneedle Investments to provide a good mix of assets. The overall management and oversight of investment strategy and policy is provided by Embark Investments, as the independent ACD.

### Have we performed for our investors?

Overall, our assessment is that the Horizon Sub-funds provide value to our investors. Our Board found that the Horizon Sub-funds are performing well against peers in a very competitive market over the medium term and during the recent period of extreme market stress. They are delivering outcomes in line with expectations and our annual charges offer value to investors in relation to long-term performance and risk.

The Board also concluded that we adapted well to the challenges triggered by Covid-19 and that we worked constructively with our key partners, namely, Columbia Threadneedle Investments as fund manager, EV as risk profile provider and Northern Trust as Depositary, Custodian, Fund Accountant and Transfer Agent. You can see how we have reached these conclusions in the pages that follow.

### Maintaining our service during Covid-19

It would be an understatement to say the last year has been out of the ordinary.

As the Covid-19 crisis took hold we moved extremely quickly to ensure business continuity for our employees and our customers. In fact, employees had already been provided with laptops, smartphones and other support to enable home working in case of business disruption.

At the same time, we have been pro-active in maintaining regular contact with our service suppliers (including the Custodian, Transfer Agent, Investment Manager and asset allocation provider) to assure ourselves of the continuity of their services to Embark Investments.

### Keeping you in the know about how your money is invested

For so many investors it is important to know where and how your money is being invested. Responsible investing – sometimes called ESG (Environmental, Social and Governance) investing – is a key consideration for the Horizon funds.

In March 2021, we announced we had signed up to the UN Principles for Responsible Investment and, in doing so, committed to maintaining and building on our existing ESG approach.

It can be challenging for investors to understand how a fund manager approaches ESG. For Horizon, we aim to be very clear about our stance. Working with our investment manager, we have chosen an 'integrated' approach. This means that ESG is part and parcel of the investment process, with companies assessed against each of the factors with a view to understanding impacts, risks and opportunities. The investment manager will therefore engage with companies on ESG issues, playing an active role in corporate governance by encouraging board and management to improve their practices when necessary. This pragmatic process of analysis and engagement differs from the 'exclusion' approach, whereby investments in certain companies and industries are not permitted. However, Horizon does not invest in companies involved in controversial weapons (e.g. personnel mines or biochemical weapons).

### The Responsibilities of the Authorised Corporate Director (ACD)

Being pro-active in our role as ACD is another way we differentiate ourselves from competitors.

As the independent ACD, we do not set the asset allocations for the Sub-funds, nor do we select their underlying investments, but we do not sit idly by either. In fact, in just the last 12 months, we have on several occasions engaged with Columbia Threadneedle Investments to adjust the universe of investments from which they can pick. For example, Columbia Threadneedle Investments can now include European High Yield bonds as a potential asset class for our investors. We also instructed the asset manager to remove direct real estate exposure (through the Property Authorised Investment Fund) from the Horizon range. This decision was taken as we had concerns around liquidity within the property asset class and furthermore, we were aware of the ongoing regulatory scrutiny about the most appropriate format for bricks-and-mortar property vehicles. Therefore, to protect investors' interests, we believed it was prudent to remove the exposure.

In short, we believe a well-run and proactive ACD can – and should – play an important role in investor outcomes.

### Value for money

So, while an Assessment of Value report can get wrapped up in numbers and metrics, we hope you can also see some of the other ways we are delivering value and continue to put investors at the heart of what we do.

My thanks go to the team at Embark Investments that helped analyse the reams of data we collected to enable us to reach our conclusions and to their commitment to the ongoing evaluation and development of Horizon.

As this is one of our first Assessment of Value reports, we are still learning and trying out fresh ways to communicate our values and purpose. If you have any suggestions on how we can improve our service, we would like to hear from you. Please let us know by contacting us in the way you normally would.



**THOMAS ROSTON, CFA**  
Chief Executive Officer  
Embark Investments

\* Horizon was named Best Specialist Risk Targeted Fund/Fund Range at the Investment Week Specialist Investment Awards 2020 (announced in December 2020).

## WHAT ARE THE ASSESSMENT OF VALUE CRITERIA?

The Financial Conduct Authority (FCA), our regulator, requires Authorised Fund Managers (AFMs) to report on fund governance with the intention of strengthening the duty of care of AFMs in acting in investors’ best interest.

The Board of Embark Investments must perform a detailed assessment on whether Sub-funds manufactured and managed by Embark Investments are providing value to investors. AFMs must carry out this assessment using a specific set of criteria and publish a statement within four months of the accounting period end.

Therefore, the Board has assessed each fund against the following criteria, as required by the FCA:

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

### Overall Assessment

- The Sub-funds are performing in line with their investment objectives as documented in the Prospectus.
- The Sub-funds are actively managed as evidenced by the strategic asset allocations from EV and active risk positions from Columbia Threadneedle Investments.
- Distribution of the Sub-funds has been in line with the target market.
- The Sub-funds are delivering outcomes consistent with long-term expectations.
- There are currently no fund capacity concerns for the Horizon Multi-Asset Sub-funds.
- The ACD received no complaints in the year.
- Processes and controls are in place for performance monitoring oversight and quarterly reporting to the Embark Investments’ Board.
- During 2020, Embark Investments has demonstrated good operational resilience and has performed well against its peers during a period of extreme economic stress. The firm has also adapted well to the Covid-19 challenges, by engaging and working with the key operational counterparties, including Columbia Threadneedle Investments, Northern Trust, EV and Funds-Axis.

The Board has concluded that the Embark Horizon Multi-Asset Sub-funds have consistently met their objectives and offer value to investors.

The table below summarises the outcome of our review of the Horizon Multi-Asset Sub-funds I-V (Z accumulation and income, as well as I accumulation share classes), for the year ending 31 May 2021, using the seven assessment criteria set by the FCA:

	Quality of Service	Performance	AFM Cost – General	Economies of Scale	Comparable Market Rates	Comparable Services	Classes of units	Overall Value Statement
Embark Horizon Multi-Asset I	●	●	●	●	●	●	●	●
Embark Horizon Multi-Asset II	●	●	●	●	●	●	●	●
Embark Horizon Multi-Asset III	●	●	●	●	●	●	●	●
Embark Horizon Multi-Asset IV	●	●	●	●	●	●	●	●
Embark Horizon Multi-Asset V	●	●	●	●	●	●	●	●

● Provides value      ● Provides value but merits some action or further monitoring      ● Does not provide value      ● Not applicable



## 1 QUALITY OF SERVICE

The Board of Embark Investments has given consideration to the overall quality of service to the investors, including the performance of the appointed external service providers.

### External Providers

The Board has evaluated the quality of services provided by the following service providers:

**EValue (EV)** is the risk profile provider for the Horizon Sub-funds. They provide the ACD and the Investment Manager with active strategic asset allocations for the five Sub-funds, consistent with the related investor profiles as set out in the Prospectus. EV takes a long-term perspective and uses stochastic modelling techniques to create an expected optimal return by risk profile.

EV also provides the ACD and the Investment Manager with a software tool used to forecast the risk levels of the Sub-funds. This allows for regular checks to ensure the Sub-funds' investments correspond to the investor profiles.

When the ACD, in consultation with EV and the Investment Manager, decided to exclude the property funds from the portfolios, EV promptly provided revised asset allocations.

The Board is satisfied that EV has provided allocations during the reporting period to permit the Sub-funds to follow the expected risk profiles.

**Columbia Threadneedle Investments (the Investment Manager)**; the Board considered the Investment Manager's process, experience and delivery in providing investment management services to the Sub-funds. It also reviewed the governance and oversight of these activities by the Embark Investments team, including monitoring of performance versus the asset allocations, respect of the Sub-funds' investment mandate restrictions, and compliance with their policies and procedures ensuring the Sub-funds retain their prescribed risk profiles. The Board is satisfied with the services provided by Columbia Threadneedle Investments.

**Northern Trust (Depository, Custodian, Fund Accountant and Transfer Agent)**; the Board considered the entire range of services that are provided to the Funds and delivery of key services against the agreed performance indicators and metrics, noting the format and frequency of committees and review meetings between Northern Trust and the Operational, Compliance and Legal teams within Embark Investments. It is satisfied with the services from Northern Trust.

**Funds-Axis (Mandate compliance and regulatory reporting)**; the Board acknowledges the supply of regulatory and mandate compliance services, ensuring the Funds are maintained within the investment objectives and policy as described to investors in the Prospectus of Embark Investment Funds ICVC. Provision of daily checks and regulatory updates are important drivers in ensuring the funds deliver to the expectations set out in the Key Investor Information Document.

**UK Platform Providers (Distribution)**; the Horizon Multi-Asset Sub-funds are distributed to advised clients through the Embark Group platforms and increasingly via third party platform providers, giving broad distribution channels. Direct investments are normally not accepted. Embark Investments has legal agreements with each platform provider. These, in turn, have terms of business in place with financial advisers using their platform. When the funds were added to new external platform providers, Embark Investments, as an ACD, met its regulatory requirements in relation to its obligation as a manufacturer of authorised UK retail funds, by ensuring funds are designed appropriately and distributed to the target market\*.

\* The funds are designed to be suitable for a broad customer base including retail, professional clients and eligible counterparties, who are characterised as customers looking for medium to long-term capital growth. They should have a basic knowledge or experience of investments, or access to advice from professionals, and should be willing to take some investment risk through exposure to the asset markets.

## Internal Governance and Oversight

The Board also gave consideration to the oversight and governance of all ACD activities, including the monitoring of outsourced services but also the Sub-funds' regulatory compliance and adherence to internal policies and procedures. The ACD has demonstrated and maintained a strong and secure control environment in these areas to support the customer experience. Particular attention was given to the performance of third-party oversight on issues or breaks of service due to the Covid-19 pandemic. The Board is pleased to note that there were no such issues or breaks reported.

During the reporting year, the Board also focused on the liquidity of the underlying investments in the Horizon funds. It decided to remove UK property authorised investment funds from the Sub-funds given the continued uncertainty around the liquidity of these vehicles.

The Board continues to monitor client communications and reporting, including the Horizon website ([www.embarkhorizon.co.uk](http://www.embarkhorizon.co.uk)). The Board is satisfied that the available information and shareholder reports are timely and accurate at all times.

## UN Principles for Responsible Investment and ESG Integration

Embark Investments is committed to the integration of Environmental, Social and Governance (ESG) considerations in the management of the Horizon Multi-Asset Fund range. Embark Investments will continue to develop the Horizon Fund range with reference to the changing investment markets and with the aim of meeting the needs of investors.

Our mission as ACD is to ensure the Horizon funds fulfil the responsible investment aspirations of investors in a way that does not curtail their financial goals, but enhances them, while adapting to trends in investments and society. We have enhanced our scrutiny of ESG factors, proactively engaging with the appointed Investment Manager, Columbia Threadneedle Investments, to understand its approach, provide our feedback and monitor its processes. When Embark Investments Limited transitioned to the Embark Group on 1 May 2020, we issued an ESG statement on the Embark Horizon website to declare our intentions.

Embark Investments confirmed its commitment to incorporating ESG factors into the investment process by signing up to the United Nations supported Principles for Responsible Investment (UN PRI) in March 2021.

An integrated approach to ESG is embedded within our investment process. The Columbia Threadneedle Investments team responsible for managing the Horizon Sub-funds works closely with in-house responsible investment experts to assess ESG risks and spot sustainable opportunities. Typically, responsible investment analysts scrutinise a company's leadership and examine the footprint and record of the company with respect to ESG aspects. The analysts engage with the company's leadership to examine the actions taken to improve the business practices and convey any concerns the responsible investment professionals may have on such practices. Columbia Threadneedle Investments was one of the founding signatories to the UNPRI.

The ACD has included oversight of Columbia Threadneedle Investments' approach in its regular reviews, monitoring the portfolio through a number of ESG-related indicators on a monthly basis and now includes ESG factors in the regular quarterly reporting for advisers.



## 1 QUALITY OF SERVICE (CONTINUED)

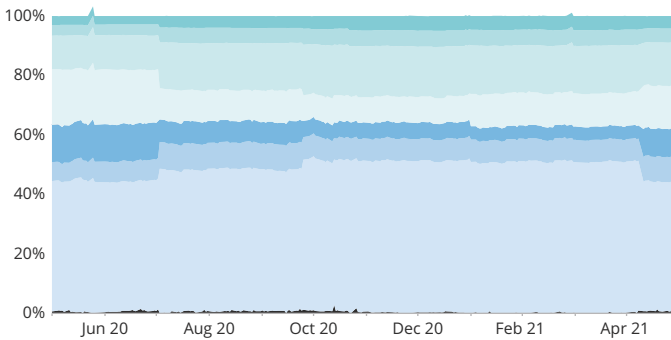
### An active investment strategy

The Horizon Multi-Asset Funds are managed according to a carefully considered asset allocation strategy. Using expected volatilities and long-term returns for global assets, EV provides us with active allocation recommendations for Horizon. These allocations seek to match each Sub-fund's risk profile. Columbia Threadneedle Investments uses these allocations to invest in different asset classes, using proprietary, actively managed, investment funds.

The graphs below show how each Sub-fund's portfolio has evolved during the reporting period. We believe this clearly illustrates the active nature of the management.

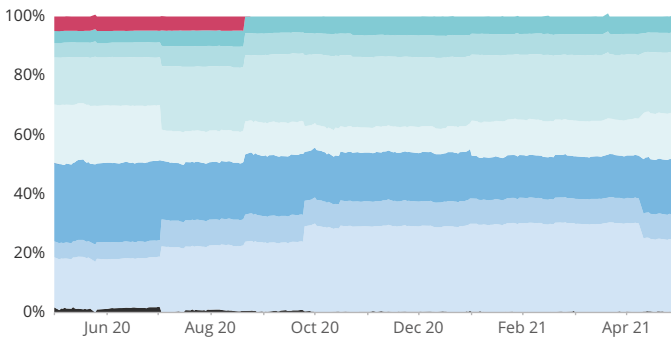
Based upon this review, the Board has concluded that the quality of the services provided by the ACD and each service provider are classified as providing value for all five Horizon Sub-funds.

#### Horizon Fund I Portfolio Breakdown

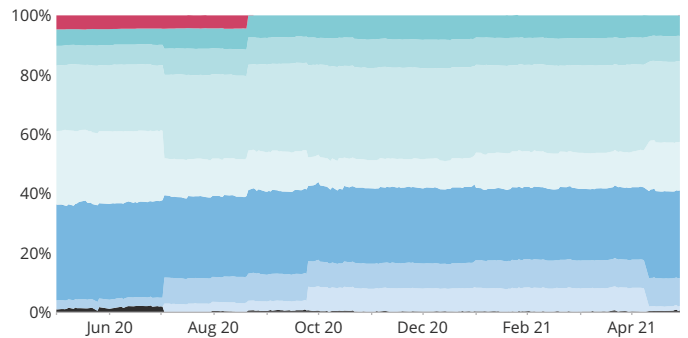


- Real Estate
- EM Equities
- Japan Equities
- Europe ex-UK Equities
- US Equities
- UK Equities
- HY Bonds
- UK Corporate Bonds
- Global Government Bonds
- UK Government Bonds
- Cash & Money Markets

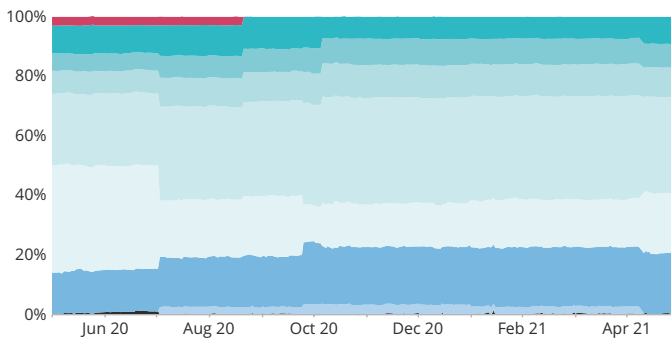
#### Horizon Fund II Portfolio Breakdown



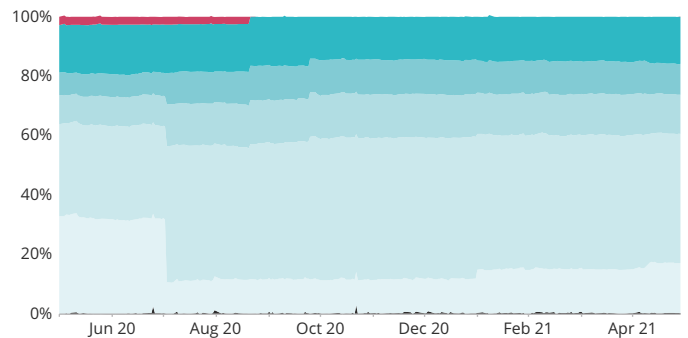
#### Horizon Fund III Portfolio Breakdown



#### Horizon Fund IV Portfolio Breakdown



#### Horizon Fund V Portfolio Breakdown







## 2 PERFORMANCE

### Horizon Sub-fund I

The Sub-fund aims to grow investment through a combination of income and capital growth over the medium to long term (five or more years). The Sub-fund will aim to achieve this objective, whilst remaining within risk profile 1, which is the lowest risk profile in the Horizon range. The Sub-fund is managed with reference to strategic asset allocations which are provided to the Investment Manager on at least a quarterly basis; these may change as a result of changing market conditions and assumptions in the Risk Profile Service Provider's asset allocation models which aim to achieve an optimal return for the expected risk level assuming a long-term (18-year) investment horizon.

Given its risk profile nature, the Sub-fund does not aim to match or exceed the performance of, and its portfolio is not constrained by, any index. The fund has been managed with a long-term horizon (18 years) and therefore shorter comparisons may not be considered complete.

However, for performance comparison purposes, the IA Mixed Investment 20-60% Shares sector group is considered appropriate. The Sub-fund's typical equity exposures and fixed income and cash exposures enable it to be included in this sector, although the asset allocation of the Sub-fund is not managed with the intention of ensuring it remains within this sector.

We reviewed the net-of-fees performance relative to its comparable IA group over three and five-year periods, and since launch. We also compared the performance of the Investment Manager versus the strategic asset allocation and versus internal risk metrics.

Our assessment is that the Sub-fund offers value for money.

	3 Year	5 Year	Launch
Horizon Sub-fund I (Z acc)	13.22%	28.82%	51.36%
IA Mixed Investment 20-60% Shares	13.65%	32.52%	44.29%

Please note that past performance is not necessarily a guide to future performance and the value of investments (and any income from them) can go down, so an investor may get back less than the amount invested. No guarantee is given for the performance of the Sub-fund. Source: FE fundinfo 2021.

### Horizon Sub-fund II

The Sub-fund aims to grow investment through a combination of income and capital growth over the medium to long term (five or more years). The Sub-fund will aim to achieve this objective, whilst remaining within risk profile 2. The Sub-fund is managed with reference to strategic asset allocations which are provided to the Investment Manager on at least a quarterly basis; these may change as a result of changing market conditions and assumptions in the Risk Profile Service Provider's asset allocation models which aim to achieve an optimal return for the expected risk level assuming a long-term (18-year) investment horizon.

Given its risk profile nature, the Sub-fund does not aim to match or exceed the performance of, and its portfolio is not constrained by, any index. The Sub-fund has been managed with a long-term horizon (18 years) and therefore shorter comparisons may not be considered complete.

However, for performance comparison purposes, the IA Mixed Investment 20-60% Shares sector group is considered appropriate. The Sub-fund's typical equity exposures and fixed income and cash exposures enable it to be included in this sector, although the asset allocation of the Sub-fund is not managed with the intention of ensuring it remains within this sector.

We reviewed the net-of-fees performance relative to its periods, comparable IA group over three and five-year periods and since launch. We also compared the performance of the Investment Manager versus the strategic asset allocation and versus internal risk metrics.

Our assessment is that the Sub-fund offers value for money.

	3 Year	5 Year	Launch
Horizon Sub-fund II (Z acc)	15.74%	39.64%	64.55%
IA Mixed Investment 20-60% Shares	13.65%	32.52%	44.29%

Please note that past performance is not necessarily a guide to future performance and the value of investments (and any income from them) can go down, so an investor may get back less than the amount invested. No guarantee is given for the performance of the Sub-fund. Source: FE fundinfo 2021.



## 2 PERFORMANCE (CONTINUED)

### Horizon Sub-fund III

The Sub-fund aims to grow investment through a combination of income and capital growth over the medium to long term (five or more years). The Sub-fund will aim to achieve this objective, whilst remaining within risk profile 3, which is the middle risk profile in the Horizon range. The Sub-fund is managed with reference to strategic asset allocations which are provided to the Investment Manager on at least a quarterly basis; these may change as a result of changing market conditions and assumptions in the Risk Profile Service Provider's asset allocation models which aim to achieve an optimal return for the expected risk level assuming a long-term (18-year) investment horizon.

Given its risk profile nature, the Sub-fund does not aim to match or exceed the performance of, and its portfolio is not constrained by, any index. The fund has been managed with a long-term horizon (18 years) and therefore shorter comparisons may not be considered complete.

However, for performance comparison purposes, the IA Mixed Investment 40-85% Shares sector group is considered appropriate. The Sub-fund's typical equity exposures and fixed income and cash exposures enable it to be included in this sector, although the asset allocation of the Sub-fund is not managed with the intention of ensuring it remains within this sector.

We reviewed the net-of-fees performance relative to its comparable IA group over three and five-year periods, and since launch. We also compared the performance of the Investment Manager versus the strategic asset allocation and versus internal risk metrics.

Our assessment is that the Sub-fund offers value for money.

	3 Year	5 Year	Launch
Horizon Sub-fund III (Z acc)	19.32%	50.76%	79.14%
IA Mixed Investment 40-85% Shares	18.82%	47.53%	63.36%

Please note that past performance is not necessarily a guide to future performance and the value of investments (and any income from them) can go down, so an investor may get back less than the amount invested. No guarantee is given for the performance of the Sub-fund. Source: FE fundinfo 2021.

### Horizon Sub-fund IV

The Sub-fund aims to grow investment through a combination of income and capital growth over the medium to long term (five or more years). The Sub-fund will aim to achieve this objective, whilst remaining within risk profile 4. The Sub-fund is managed with reference to strategic asset allocations which are provided to the Investment Manager on at least a quarterly basis; these may change as a result of changing market conditions and assumptions in the Risk Profile Service Provider's asset allocation models which aim to achieve an optimal return for the expected risk level assuming a long-term (18-year) investment horizon.

Given its risk profile nature, the Sub-fund does not aim to match or exceed the performance of, and its portfolio is not constrained by, any index. The fund has been managed with a long-term horizon (18 years) and therefore shorter comparisons may not be considered complete.

However, for performance comparison purposes, the IA Mixed Investment 40-85% Shares sector group is considered appropriate. The Sub-fund's typical equity exposures and fixed income and cash exposures enable it to be included in this sector, although the asset allocation of the Sub-fund is not managed with the intention of ensuring it remains within this sector.

We reviewed the net-of-fees performance relative to its comparable IA group over three and five-year periods, and since launch. We also compared the performance of the Investment Manager versus the strategic asset allocation and versus internal risk metrics.

Our assessment is that the Sub-fund offers value for money.

	3 Year	5 Year	Launch
Horizon Sub-fund IV (Z acc)	23.23%	65.11%	97.61%
IA Mixed Investment 40-85% Shares	18.82%	47.53%	63.36%

Please note that past performance is not necessarily a guide to future performance and the value of investments (and any income from them) can go down, so an investor may get back less than the amount invested. No guarantee is given for the performance of the Sub-fund. Source: FE fundinfo 2021.

## Horizon Sub-fund V

The Sub-fund aims to grow investment through a combination of income and capital growth over the medium to long term (five or more years). The Sub-fund will aim to achieve this objective, whilst remaining within risk profile 5, which is the highest risk profile in the Horizon range. The Sub-fund is managed with reference to strategic asset allocations which are provided to the Investment Manager on at least a quarterly basis; these may change as a result of changing market conditions and assumptions in the Risk Profile Service Provider's asset allocation models which aim to achieve an optimal return for the expected risk level assuming a long-term (18-year) investment horizon.

Given its risk profile nature, the Sub-fund does not aim to match or exceed the performance of, and its portfolio is not constrained by, any index. The fund has been managed with a long-term horizon (18 years) and therefore shorter comparisons may not be considered complete.

However, for performance comparison purposes, the IA Flexible Investments sector group is considered appropriate. The Sub-fund's typical equity exposures and fixed income and cash exposures enable it to be included in this sector, although the asset allocation of the Sub-fund is not managed with the intention of ensuring it remains within this sector.

We reviewed the net-of-fees performance relative to its comparable IA group over three and five-year periods, and since launch. We also compared the performance of the Investment Manager versus the strategic asset allocation and versus internal risk metrics.

Our assessment is that the Sub-fund offers value for money.

	3 Year	5 Year	Launch
Horizon Sub-fund V (Z acc)	33.46%	89.11%	126.28%
IA Flexible Investments	20.66%	53.56%	67.54%

Please note that past performance is not necessarily a guide to future performance and the value of investments (and any income from them) can go down, so an investor may get back less than the amount invested. No guarantee is given for the performance of the Sub-fund. Source: FE fundinfo 2021.



### 3 AFM COSTS – GENERAL

The Board is required to consider the cost of providing the service to which the charge relates, and when money is paid directly to associates or external parties. We have therefore assessed the charging structure of the Sub-funds.

All Horizon Multi-Asset Sub-funds are subject to an Annual Management Charge (AMC) which is paid to the ACD (Embark Investments). The AMC covers all services organised by the ACD for the Horizon Sub-funds. The AMC includes, but is not limited to, Investment Manager, Custody and other third-party administrator fees.

The Board considers that the AMC offers value to investors, as demonstrated by performance relative to comparable funds, peer group costs and the active management of the funds for all five Sub-funds and the two share classes (Z and I).

In addition, the Board also reviewed the OCF (Ongoing Charges Figure), which is the aggregate of the above AMC and any other ongoing costs and charges incurred by each Sub-fund in the underlying investments, being Columbia Threadneedle Investments funds. The latter varies between 0.06% and 0.08% dependent on the Horizon Sub-fund. The table below shows a reduction in OCF for three funds throughout the period, demonstrating a concerted effort within the underlying Columbia Threadneedle Investments funds to reduce charges, which has a clear benefit to the Horizon Sub-funds and their investors.

	AMC 31 May 2021	OCF 31 May 2021	AMC 31 May 2020	OCF 31 May 2020
<b>Embark Horizon Multi-Asset I Z Class</b>	<b>0.75%</b>	<b>0.83%</b>	<b>0.75%</b>	<b>0.84%</b>
Embark Horizon Multi-Asset I I Class	0.65%	0.73%	0.65%	0.74%
<b>Embark Horizon Multi-Asset II Z Class</b>	<b>0.75%</b>	<b>0.82%</b>	<b>0.75%</b>	<b>0.82%</b>
Embark Horizon Multi-Asset II I Class	0.65%	0.72%	0.65%	0.71%
<b>Embark Horizon Multi-Asset III Z Class</b>	<b>0.75%</b>	<b>0.81%</b>	<b>0.75%</b>	<b>0.81%</b>
Embark Horizon Multi-Asset III I Class	0.65%	0.71%	0.65%	0.71%
<b>Embark Horizon Multi-Asset IV Z Class</b>	<b>0.75%</b>	<b>0.81%</b>	<b>0.75%</b>	<b>0.81%</b>
Embark Horizon Multi-Asset IV I Class	0.65%	0.71%	0.65%	0.71%
<b>Embark Horizon Multi-Asset V Z Class</b>	<b>0.75%</b>	<b>0.81%</b>	<b>0.75%</b>	<b>0.82%</b>
Embark Horizon Multi-Asset V I Class	0.65%	0.71%	0.65%	0.72%

Source: FE fundinfo 2021

#### Performance Fee

There are no performance fees charged for holding the Embark Horizon Multi-Asset Funds, regardless of the level of performance achieved.

#### Initial Charge

There is no initial charge for investing into the Embark Horizon Multi-Asset Funds.

#### Switching Charge

There is no charge for switching in (or out of) the Embark Horizon Multi-Asset Funds.

#### Exit/Redemption Charge

There is no exit charge for disinvesting from the Embark Horizon Multi-Asset Funds.



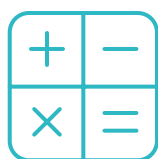
## 4 ECONOMIES OF SCALE

The ACD has considered the extent to which economies of scale would be realised as the Sub-funds grow and whether the Sub-funds' fee levels reflect these economies of scale for the benefit of investors.

The Board regularly reviews the profitability of the Sub-funds to the ACD and the Investment Manager. The five Horizon Sub-funds are currently of insufficient size to generate economies of scale to the ACD or the Investment Manager, once operational costs and the costs of managing the funds are taken into consideration. The Board determined that economies of scale could not be realised at present with the AMC and was satisfied with the current fee structure. However, the Board will continue to monitor Horizon to evaluate the levels of AMC in the future.

The Board considered each Sub-fund's fee structure, asset size and Ongoing Charges Figure (OCF). In addition, the Board reviewed profitability information it received in connection with the services provided to each Sub-fund.

The Board noted that the AMC schedule for each share class is currently fixed and does not incorporate economies of scale.



## 5 COMPARABLE MARKET RATES

We have compared the Horizon Annual Management Charge (AMC) and Ongoing Charges Figure (OCF) of the Sub-funds to other funds in the UK retail market, and how the Horizon AMC and OCF have evolved during the period.

All five Horizon Sub-funds have an AMC of 0.75% for the Z share class and 0.65% for the I share class. We believe these charges are competitive for UK private investors and offer value.

The comparison below shows the overall cost of the funds' Z share class (both accumulation and income) is between 0.34% to 0.40% less expensive than the average OCF for the IA sector.

The overall cost of the I share class (accumulation) is between 0.44% to 0.50% less expensive than the average OCF for the IA sector\*.

The OCFs in the table include the costs directly charged to the Horizon funds, as well as the OCF of the underlying Columbia Threadneedle Investments funds. Any rebates received from the Columbia Threadneedle Investments funds are credited to the Horizon funds and not to the ACD.

The AMC, which is a component of the OCF, is between 0.02% to 0.10% lower than the sector average and includes the services of the risk profile provider (EV), the Depository, Administrator and Transfer Agent (Northern Trust) and the Investment Manager (Columbia Threadneedle Investments).

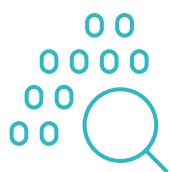
The AMC of the I share class (accumulation) is between 0.12% to 0.20% lower than the average OCF for the IA sector\*.

We note that the sector averages below include passively managed funds, which tend to have low fees compared to most actively managed funds.

\* Eligibility for investment in the I Share Class is restricted to intermediaries investing on behalf of underlying investors that have entered into arrangements for this Share Class with the ACD or other members of its Group and which the ACD expects to invest (or when added to investments made by members of their Group to invest) at least £10,000,000 per annum into the Fund.

Fund Class & Sector	OCF	AMC
<b>Embark Horizon Multi-Asset I Z Class</b>	<b>0.83%</b>	<b>0.75%</b>
Embark Horizon Multi-Asset I I Class	0.73%	0.65%
IA Mixed Investment 20-60% Shares Average	1.19%	0.82%
<b>Embark Horizon Multi-Asset II Z Class</b>	<b>0.82%</b>	<b>0.75%</b>
Embark Horizon Multi-Asset II I Class	0.72%	0.65%
IA Mixed Investment 20-60% Shares Average	1.19%	0.82%
<b>Embark Horizon Multi-Asset III Z Class</b>	<b>0.81%</b>	<b>0.75%</b>
Embark Horizon Multi-Asset III I Class	0.71%	0.65%
IA Mixed Investment 40-85% Shares Average	1.15%	0.77%
<b>Embark Horizon Multi-Asset IV Z Class</b>	<b>0.81%</b>	<b>0.75%</b>
Embark Horizon Multi-Asset IV I Class	0.71%	0.65%
IA Mixed Investment 40-85% Shares Average	1.15%	0.77%
<b>Embark Horizon Multi-Asset V Z Class</b>	<b>0.81%</b>	<b>0.75%</b>
Embark Horizon Multi-Asset V I Class	0.71%	0.65%
IA Flexible Investment Average	1.21%	0.85%

Source: FE fundinfo 2021



## 6 COMPARABLE SERVICES

The five Horizon Sub-funds are our only fund offering.

We like to keep things straightforward and prefer to evolve our Sub-funds' approach as the world changes, rather than launching a plethora of new products. Therefore, neither the ACD, nor any other member of the Embark Group, provides comparable investment management services to investors.



## 7 CLASSES OF UNITS

We have assessed the current share class structure and their appropriateness for the holders.

Three share classes were offered in the Embark Horizon Multi-Asset Sub-funds at the end of the assessment period: Z accumulation, Z income and I accumulation.

The pricing of each Share Class is considered to provide value based on the different Share Class eligibility criteria and target investor for each Share Class. All investors are invested appropriately in the Share Class they are eligible to hold in the Fund at the date of this assessment report.

The AMC for the Z accumulation and Z income shares is 0.75%. The AMC for the I accumulation shares is 0.65%.

The accumulation shares accrue all dividends and interest after tax, whereas the income shares pay out a bi-annual distribution to investors. As an alternative to using the income class, investors may seek advice from their financial adviser on the use of drawdown options offered by their investment platform.

The ACD regularly reviews the appropriateness of I class eligibility and actions accordingly.

Investment Minima:	Class Z	Class I*
Lump Sum:	£1,000,000	£10,000,000
Holding:	£50,000	£10,000,000
Top-Up:	£50,000	£1,000,000
Redemption:	£500,000	£1,000,000

The ACD may waive the investment minima at its discretion.

\* Eligibility for investment in the I Share Class is restricted to intermediaries investing on behalf of underlying investors that have entered into arrangements for this Share Class with the ACD or other members of its Group and which the ACD expects to invest (or when added to investments made by members of their Group to invest) at least £10,000,000 per annum into the Fund.



If you require further information on any of the Embark Horizon Multi-Asset Funds, the Key Investor Information Document (KIID) and the prospectus are both available on the website [www.embarkhorizon.co.uk](http://www.embarkhorizon.co.uk). The Authorised Corporate Director of the Embark Investment Funds ICVC (in this document "Horizon") is Embark Investments Limited (in this document "Embark Investments"), authorised and regulated by the Financial Conduct Authority. Registered in England and Wales under registered number 3383730. Registered Office: 100 Cannon Street, London, EC4N 6EU.

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