



Investment Management Association
65 Kingsway
London WC2B 6TD

By email: financialreporting@investmentuk.org

Dear Sirs,

Invitation to Comment – Statement of Recommended Practice – Financial Statements of UK Authorised Funds

Thank you for the opportunity to comment on the proposed revision to the Statement of Recommended Practice (SORP) for the financial statements of UK authorised funds.

Thomas Murray IDS ("TMIDS") would like to take this opportunity to comment on Sections 11 and 12, concerning disclosure of transaction costs. TMIDS' proposes full disclosure of all transaction costs incurred by segregated and pooled funds managed on behalf of retail and institutional investors.

Below is a list of the costs which TMIDS believes should be disclosed by all funds.

	Field	Data type	Source
Client level	Client name	Text	Client
	Client domicile	Text	Client
	Financial year end	Date	Client
	Year	Year	Year
	Quarter	Quarter	Year
Investment management level	Investment management company name	Text	Investment Manager
	Investment management company address	Text	Investment Manager
	Portfolio manager name (optional)	Text	Portfolio
	Portfolio manager contact details (optional)	Text	Portfolio

	Field	Data type	Source
	Portfolio full name	Text	Portfolio
	Portfolio description (strategy, geography etc.)	Text	Portfolio
	Active or passive management?	Active/Passive	Portfolio
	Segregated, or pooled fund?	Segregated/Pooled	Portfolio
	Asset class	Text	Portfolio
	Portfolio base currency	Currency Code	Portfolio
	Value of client's assets in portfolio at the beginning of the financial year	Currency Value	Portfolio
	Value of client's assets in portfolio at the end of the financial year	Currency Value	Portfolio
	Total value of pooled fund at the beginning of the financial year (if applicable)	Currency Value	Portfolio
	Total value of pooled fund at the end of the financial year (if applicable)	Currency Value	Portfolio
	Portfolio gross return on investment	Percentage	Portfolio
	Investment management fees	Currency Value	Portfolio
	Performance fees charged in year	Currency Value	Portfolio
	Period for which performance fees charged	Date Range	Portfolio
	Performance fees basis/notes (to understand any accruals, past period components etc.)	Text	Portfolio
	Initial charge paid, if applicable (can include load fees and	Currency Value	Portfolio

	Field	Data type	Source
	bid-offer spreads)		
	Initial charge spread	Percentage	Portfolio
	Exit charge paid, if any	Currency Value	Portfolio
	Exit charge spread	Percentage	Portfolio
	Other fees	Currency Value	Portfolio
	Rebates (if any) or other	Currency Value	Portfolio
	Rebate/other cost factor notes	Text	Portfolio
	Actual bid-offer spread (e.g. for bonds and equities)	Basis Points	Portfolio
	Was the portfolio used for transition?	Yes/No	Portfolio
	Dates of transition period	Date Range	Portfolio
Brokerage level	Broker name (if aggregated/not named, state "Others")	Text	Broker
	Value of purchases	Currency Value	Broker
	Value of sales	Currency Value	Broker
	Commissions paid – full service (equities)	Currency Value	Broker
	Commissions paid – execution only (equities)	Currency Value	Broker
	Separate research charges (not included in full service)	Currency Value	Broker
	Unbundled commissions and research payments	Currency Value	Broker
	Taxes and regulatory/market charges (e.g. UK stamp duty, levies)	Currency Value	Broker
	Any other broker charges	Currency Value	Broker

	Field	Data type	Source
Ancillary costs and revenues level	Gross revenues from securities lending	Currency Value	Agent lender
	Net revenues from securities lending (i.e. net of share taken by agent lenders, if any)	Currency Value	Agent lender
	Interest income on cash awaiting investment (i.e. not cash used for day-to-day operational purposes)	Currency Value	Cash manager/custodian bank
	Spreads paid on foreign exchange bargains (i.e. bid and offer prices paid by counterparties)	Basis Points	FX execution agent/custodian bank
Service provider level	Custody fees	Currency Value	Custodian bank
	Pension plan administration charges (third party or in-house)	Currency Value	Pension plan administrator/client
	Total fees paid to actuaries	Currency Value	Client
	Total fees paid to investment consultants	Currency Value	Client
	Total fees paid to legal advisers	Currency Value	Client
	Total fees paid to auditors to the fund	Currency Value	Client
	Other	Currency Value	Client

TMIDS would also encourage the IMA and its member funds to do more to publicise the existence of current and future disclosure. In TMIDS' experience, many pension funds do not know of the existence of the current Level 1 and Level 2 disclosure tables and those who do, do not have any basis for comparison and therefore find the data of limited use.

Yours faithfully



Nicholas M Bradley
Joint Managing Director

Thomas Murray IDS