

THE
INVESTMENT
ASSOCIATION

The Investment Association
Consultation on the future of the IA Global and Specialist sectors

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Purpose of the Consultation

The Investment Association (IA) has a longstanding history of providing its sectors as a tool to narrow down investment funds into more manageable buckets. The IA sectors have a number of different users, including consumers, advisers, platforms, fund managers and fund selectors such as DFMs or wealth managers.

Last year, the IA confirmed that it would allow physical ETFs to be included in existing IA sectors and asked ETF providers to submit their ETFs for classification. The number of submissions ultimately received was far higher than earlier consultation suggested, with some sectors set to expand significantly in size as a result of ETFs being included. The IA Global and Specialist sectors were two sectors that received high numbers of ETF submissions. This caused the IA Sectors' Team to analyse the opportunity to break out viable sectors from the Global and Specialist sectors so that investors can more easily find and compare fund peer groups. This work builds on the consultation on splitting up the Global Bonds sector, which closed in October 2020.

This consultation focuses on creating more granular sectors from the existing universe of funds in the Global and Specialist sectors and from the ETF submissions, where the ETF has elected to join these sectors. It is expected that many of the funds that will populate these new sectors will be drawn from the Global and Specialist sectors and from the ETF submissions but there may be funds in the other regional equity sectors that would be eligible to join.

We seek the views of IA members and external stakeholders on the proposed sectors set out in Part 1 of this consultation paper. These sectors have been formulated based on discussions with investment managers, the IA Sectors Advisory Group¹ and a number of fund selectors² to ascertain the characteristics that they value in their portfolio construction.

This document is structured as follows:

- The introduction sets out the background to IA sectors and the classification process.
- **Part 1** sets out the proposal to create more granular sectors from the existing population of funds in the IA Global and Specialist sectors and ETFs that have elected to be classified to these sectors. This section includes the new definitions, comments around the decision making process and questions that arise on each proposed new sector. The IA would welcome comments from all users of the IA sectors.
- **Part 2** is specifically for managers who have a fund in the existing sectors or who may wish to move a fund into the new sectors. It asks managers to confirm which new sector would be most appropriate for their fund(s). UK domiciled funds may need to take action on sector changes if they use the IA Global sector as a benchmark under the FCA's benchmark guidance. It sets out IA policy in this regard.
- **Appendix 1** provides the list of funds eligible for the proposed sectors grouped by sector.

¹ The Advisory Group to the Sectors Committee was formed in June 2019 and participants are IFAs, platforms, consumer groups and financial commentators.

² Fund selectors include discretionary fund managers, wealth managers or other financial intermediaries involved in the fund selection process.

The IA welcomes responses from all stakeholders interested in the distribution of funds in the UK and particularly encourages consumer representatives, distributors, advisers and fund selectors to engage in this process.

The consultation will remain open for comment until Friday 11th December 2020. The intention is to introduce the new sectors by Q2 2021.

Respondents can reply by email to sectors@theia.org

Introduction to Sectors

IA sectors aim to help investors find specific types of open-ended funds and narrow the universe of available funds so as to make like for like comparisons. The IA's focus is on funds that can be marketed to retail investors in the UK.³ The IA provides a list of funds classified to its sectors on its website.⁴

The variety of funds available for sale in the UK is important. The IA sectors offer a way of dividing up the universe into groups so as to facilitate meaningful comparison between a more manageable number of funds. As at June 2020, 2551 UK funds were categorized within sectors as well as 1079 overseas funds – the latter are all non-UK-UCITS, registered (recognised) for sale, with reporting fund status.

Funds within a sector, while having similar characteristics, remain distinctive in that they can have different investment approaches (e.g. active vs. passive) or a choice of different underlying instruments (e.g. large cap vs. mid cap stocks).

Classification process

At the outset, fund providers choose which sector their fund should appear in and submit their request to the IA. Funds should meet the sector parameters set out in their chosen sector. Once classified, funds should aim to stay in line with the sector definition on a continuous basis. Sector inclusion is, therefore, a voluntary election but providers must ensure their funds adhere to the sector criteria once admitted.

The IA has appointed a third-party monitoring company to collect monthly data from firms to assess whether a fund meets the criteria of its chosen sector on an ongoing basis. If the mandate of the fund and the criteria for an IA sector diverge, the manager of the fund must still comply with the parameters set out in the relevant IA sector definition if they wish to be classified to that sector. Compliance with sector definitions is the responsibility of the manager.

A number of data vendors collect performance data directly from firms and combine it with information on the funds that populate each IA sector in order to create sector performance averages and ranking tables. These help investors to compare past performance and conduct their own due diligence on funds.

Investors may also compare fund data that is not performance-related such as charges or minimum investment limits. This data may be found in a fund's prospectus or in its Value Assessment.

³ Unit trusts, OEICS and ETFs are types of fund structures which under UK regulation, enforced by the Financial Conduct Authority (FCA), can only be promoted to retail investors in the UK if the FCA has either authorised them – if established in the UK - or recognised them – if established overseas. Many of the FCA recognised funds are UCITS established in another EEA country.

⁴ <https://www.theinvestmentassociation.org/fund-sectors/funds.html>

Creating new IA sectors

The IA only creates new sectors when there are sufficient funds of a similar type in the existing universe. To assess the viability of new sectors, the IA considers the following factors:

- Size of the sector (i.e. the number of funds): there must be ten funds or more.
- Size of FUM within a sector: a new sector should have a reasonable level of funds under management. Whilst there is no set rule that IA sectors apply on a minimum level of FUM, it is a factor in any decision made on creating new sectors.
- Composition of the sector by diversity of firms: for a sector to be viable, there must be a reasonable spread of investment managers represented. This is particularly important for performance and ranking data and so that investors are able to find and compare funds from a suitable range of managers.

PART 1: Proposed new sectors

Our approach to the new sector development

The factors used to assess the viability of new sectors have been applied to a number of areas to determine whether or not there are enough funds to create a credible sector. This exercise included the ETFs that were submitted for entry to IA sectors in 2019.

The proposed new sectors can be broadly broken down as:

- New country/regional equity sectors: Latin America; India; Global Smaller Companies
- Industry sectors: Financials; Healthcare
- Alternative investment approaches: Infrastructure; Commodity/Natural Resources; Gold and Precious Metals

We have included a sector classification schematic over the page to show how the new sectors will fit into the existing sector framework.

Some of the proposed sectors will allow like for like performance comparisons, others will simply act as signposts to help investors find specific types of funds because we do not believe that performance comparison is appropriate, although we would welcome respondent's views on our assessment.

For the purposes of the analysis, the IA has identified fund strategies based on publicly available information, whether it is disclosed in the fund's objective or from data held on data vendor databases. The allocation of funds to specific sectors is subject to confirmation from each fund group that they wish to move to the new sector: the IA Global and IA Specialist sectors will continue to exist following the creation of the new sectors, unlike the IA Global Bonds sector, which is being split up. The Global Bonds consultation can be found [here](#).

The fund would also be subject to monitoring checks based on the agreed sector parameters. Monitoring checks cannot be conducted until the parameters in the definitions are confirmed. The IA will be writing to firms that have a fund that is impacted by the changes and will ask for confirmation of their preferred category. This process may mean that some of the new sectors will not be deemed viable or may be subject to change.

Sector Classification Schematic

Primary outcome



	Growth	Income	Capital Protection	Specialist
Cash/ Liquidity			Short-term Money Market; Standard Money Market	
Fixed income		UK Gilts; UK Index Linked Gilts; £ Corp Bond; £ Strat Bond; £ High Yield; US Gov Bond; EUR Gov Bond; Global Gov Bond; Global Inflation Linked Bond; USD Corp Bond; EUR Corp Bond; Global Corp Bond; USD Strategic; EUR Strategic; Global Strategic; Global High Yield		Specialist Bond
Equity	UK All Cos; UK Smaller Cos; Japan; Japanese Smaller Cos; Asa Pac inc Japan; Asia Pac ex Japan; China/Greater China; India; Latin America ; North America; North America Smaller Cos; Europe inc UK; Europe ex UK; Global; Global Smaller Cos ; Global Emerging Markets	UK Equity Income; Global Equity Income		Tech & Telecoms; Financials; Healthcare; Gold & Precious Metals; Commodity & Natural Resources
Mixed asset	Mixed Asset 0-30% Shares; Mixed Asset 20-60% Shares; Mixed Asset 40-85% Shares; Flexible Investment	UK Equity & Bond Income;		
Other				UK Property Direct; Property Other; Specialist; Infrastructure
		Volatility Managed	Targeted Absolute Return	Unclassified

Proposed new sectors

The following is a list of new sectors and their proposed definitions. The number of funds that could populate each sector is indicated after each definition and includes both mutual funds and ETFs. Comments on the rationale for the definition and notes are provided after each definition and questions for consideration then follow. The list of funds allocated to the proposed sectors is in Appendix 1, page 14.

New country/regional equity sectors:

- Latin America; (18 funds) – pg 7
- India; (23 funds) – pg 7
- Global Smaller Companies (12 funds) – pg 8

Industry sectors:

- Financials; (19 funds) – pg 9
- Healthcare (15 funds) – pg 9

Alternative investment approaches:

- Infrastructure; (24 funds) – pg 10
- Gold and Precious Metals; (10 funds) – pg 11
- Commodity/Natural Resources (31 funds) – pg 11

General questions

1. Based on the definitions set out below, and the fund groupings included in Appendix 1, do you agree that the IA should launch the proposed new sectors? Please provide feedback on the benefits to investors that you see in launching these sectors and any potential concerns in relation to the creation of these sectors
2. Do you have any comments on the definitions? Or the notes that the IA proposes to include for each new sector?
3. Do you have any general comments on the IA's approach?

We have set out the sector definitions in more detail over the page including comments on how we set each definition. Here we include specific questions relating to each sector.

Regional /Country equity sectors:

1. Latin America

Funds which invest at least 80% of their assets in Latin American equities. [18 funds]

Specific sector notes:

- *Latin America is defined as those countries included in the major indices*
- *Funds are expected to be diversified. Single country funds will be included in the Specialist sector.*

Comments on setting the definition:

The IA formulates definitions based on the approach taken by managers wherever possible. In this regard, the IA prefers not to define regions but instead to use the definitions of the benchmarks most widely used within a sector as a reference. This means that the IA avoids having to update its definitions when benchmarks change, for example, when a country comes into or falls out of a benchmark. The indices most widely used as benchmarks by funds investing in Latin America are the MSCI EM Latin America, the MSCI Latin America 10/40 and the FTSE Latin America. Countries included in the indices are: Brazil, Mexico, Columbia, Peru, Chile, Argentina and Other (unspecified). Most funds in this sector are offshore domiciled.

Consultation questions:

4. Do you agree with using the reference benchmarks to set the countries/region that can count towards the core 80%?
5. Do you agree that single country funds should remain in the Specialist sector e.g. Brazilian funds rather than being included in a Latin America sector?

2. India

Funds which invest at least 80% of their assets in equities of India/the Indian sub-continent. Funds may invest solely in India or be diversified across the sub-continent. [23 funds]

Specific sector notes:

- *Funds that invest solely in Sri Lanka, Pakistan or Bangladesh with the intention to gain specific exposure to these countries will be included in the Specialist sector.*

Comments on setting the definition:

The definition allows funds to invest in India or the Indian sub-continent. This reflects the range of funds available to investors. The approach in the definition mirrors the approach taken by the IA in the China/Greater China sector. The most common benchmark used by funds is MSCI India. Some funds use MSCI India 10/40 or the S&P BSE index. Most funds in this sector are offshore domiciled.

Consultation questions:

6. Should countries that are part of the Indian sub-continent be allowed in the core 80%?
7. If they should, have we specified the countries that could be classed as part of the Indian sub-continent correctly in the definition?

3. Global Smaller Companies

Funds which invest at least 80% of their assets in the equities of companies that form the bottom 15% by market capitalisation of the global market or that are no larger than the largest company in a recognised global small cap index [such as the MSCI AC Country World Small Cap Index]. [12 funds]

Specific sector notes:

- *Funds are expected to be diversified globally and may invest in developed or emerging markets.*
- *Some funds may choose to invest only in developed markets, so performance comparisons may be inappropriate across the whole sector.*

Comments on setting the definition:

All the existing IA small cap sector definitions are currently defined by reference to investment in the bottom x% of the [country/region] by market cap. While some small cap fund objectives take this approach, others define their universe by reference to the largest company in their benchmark. Anything below the largest company's market cap is acceptable as a smaller company. The IA therefore believes that it may need to update the approach in all its smaller companies sectors. The suggested definition for the proposed Global Smaller Companies sector reflects the existing methodology but also the proposed new methodology. The definition has chosen to use the bottom 15% of companies by market cap in the global universe consistent with the most widely used benchmarks [MSCI World Small Cap, S&P Developed Small]. We are interested to hear if this is the correct level.

The IA has identified a universe of funds that invest in global smaller companies. Some of the fund objectives allow the manager to invest in both emerging and developed countries, others limit the exposure to only developed global markets. We are proposing that both types of fund are accommodated in order to make the new sector viable. A note to the sector indicates that performance comparisons may be inappropriate.

Consultation questions:

8. Is the bottom 15% of market capitalisation the right threshold?
9. Should reference also be made in the definition to stocks being no larger than the largest constituent in a relevant small cap index? We do not currently reference indices in the other small companies sectors, do we need to review the other smaller company sector definitions?
10. The sector is only viable if it includes funds that invest in both developed and emerging global markets. Do you agree with this approach?
11. Funds would be allowed to invest across developed and emerging market smaller companies, is performance comparison therefore appropriate?

Industry Sectors:

4. Financials

Funds that invest at least 80% of their assets in equities of financial services companies as defined by ICB/GICs, including industries such as banking, insurance, capital markets and consumer finance in any country. [19 funds]

Specific sector notes:

- *Funds may also invest in Mortgage Reits as part of the core allocation.*
- *Funds may be diversified or focused on a particular part of the industry, for example, just banks or insurers.*

Comments on setting the definition:

Recent IA communication with fund selectors has indicated that they have an appetite for the IA to create more industry sectors where they are viable.

The IA currently only operates one industry sector – the Technology and Telecommunications (T&T) sector. The T&T definition references investing in technology and telecoms companies as defined by a major index provider. The two main index providers are MSCI and FTSE and they use the GICs and ICB frameworks to allocate companies to an industry sector. The IA proposes to use the ICB and GICs financial services company definitions to monitor the proposed Financials sector. However, using these classification frameworks can create some issues as companies with diverse business lines can operate across different industry sectors: for example in the T&T sector, Amazon is classified as a consumer discretionary company by MSCI GICS but it is unlikely that an investor would find it surprising that a technology fund holds Amazon. This could create challenges in monitoring the industry sectors and we would be interested to hear views from member firms on possible solutions to this challenge.

Consultation questions:

12. Should we allow more focused funds to be classified to this sector rather than to the Specialist or Global sectors? i.e. those funds investing in just banks or just insurers.
13. Should we allow funds investing in fintech to be eligible for this category?
14. If we allow both diversified and focused funds to be classified to this sector, would this mean that performance comparisons are inappropriate?
15. Should there be a geographic diversification test?
16. The major indices include Mortgage Reits – is it appropriate for Mortgage Reits to count towards the core allocation for funds in this sector?

5. Healthcare

Funds that invest at least 80% of their assets in equities of companies that operate in sectors related to healthcare as defined by ICB/GICs, including industries such as pharmaceuticals, biotechnology and life sciences and healthcare equipment and services in any country. [15 funds]

Specific sector notes:

- *Funds should be diversified, they may also invest in a theme such as healthcare innovation.*

Comments on setting the definition:

We believe that the Healthcare sector should not include more focused biotech funds because of the different risk profile of biotech companies. We have therefore made a note in the definition that we require funds to be sufficiently diversified. Other than this, our comments are the same as those noted above for the Financials sector.

Consultation questions:

17. Should we allow more focused funds to be eligible for this sector e.g. pharmaceutical or biotech focused funds?

Alternative investment sectors:

6. Infrastructure

Funds that invest at least 80% of their assets (directly or indirectly) in companies involved in the ownership, operation or maintenance of infrastructure assets (including but not limited to: utilities, energy, transport, health, education, security, communications) [24 funds]

Specific sector notes:

- *It is expected that funds will invest primarily in equities, but debt securities, hybrid bonds and convertibles and physical infrastructure assets may also contribute to the core 80%;*
- *Funds may be diversified by region or sector or may have a specific focus. Investors should conduct their own due diligence. Owing to the diversity of approaches, like for like performance comparisons are inappropriate.*

Comments on setting the definition:

The intention is to create a sector that acts as a signpost to all types of infrastructure funds whilst noting that like for like comparisons would therefore be inappropriate. There is a subset of funds that limit their investment to global listed infrastructure assets, but discussions with the Sectors Committee and the Advisory Group to the Sectors Committee suggest that it is more helpful to an investor to be able to find any fund with a remit to invest in infrastructure. The Committee also felt that there could be scope in the future to sub divide this sector if it increases in size, as the IA did by splitting its Property sector into UK Direct Property and Property Other. This means that this sector would accommodate industry focused and country/region focused infrastructure funds. A sector that only accommodates global listed infrastructure funds would be viable based on the number of funds available to investors, but only just. This would leave other infrastructure funds to be classified to Specialist or another country/regional equity sector if their equity holdings were sufficient.

Our analysis suggests that most infrastructure funds in the IA sector universe are investing predominantly in equities but there are some funds that focus more heavily on infrastructure debt or may also invest in property. Some funds, particularly those investing in UK infrastructure, gain their exposure to infrastructure through investment companies. We are therefore interested in any comments on how to set the core parameters in a new sector: should funds in this sector be primarily investing in equities or should funds investing primarily in debt securities and/or physical assets be classified to this sector? There are also some funds that invest in 'real assets', which include infrastructure but also property. These funds typically hold more than 20% in property. As the current definition stands, these funds would be ineligible for the infrastructure sector but it may be that this sector would provide a more logical home for 'real assets' funds than the Specialist sector. There may also be some definitional challenges around the classification of listed companies as infrastructure. The GICS/ ICB classification could be used.

As performance comparisons would be inappropriate, it is unlikely that the data providers would create a sector average index for this sector.

Consultation questions:

18. Do you agree with our approach to create a broad sector for all types of infrastructure funds, where like for like performance comparisons would be inappropriate? If you do not, please specify why not.
19. Should the 80% investment in core infrastructure include:
 - a) Just equities;
 - b) Equities and specific hybrid debt – prefs and convertibles;
 - c) Equity and all types of debt
 - d) Equity and property
 - e) Equity, all types of debt, property.
 - f) Other – please specify
20. Do you believe that funds investing in 'real assets' including infrastructure and property should be eligible for this sector, or should these funds remain in the Specialist sector?

7. Gold and Precious Metals

Funds that invest at least 80% of their assets in precious metal related securities. [10 funds]

Specific sector notes:

- *It is expected that funds will invest principally in mining shares. Funds may invest in companies mining Gold, Silver, Platinum and other precious metals. Some may own small amounts of gold bullion securities.*

Comments on setting the definition:

Similar to the Infrastructure sector above, the intention is to create a sector that acts as a signpost to all types of precious metals funds whilst noting that like for like comparisons may be inappropriate, although we would like to gather feedback on this point. There is a small subset of funds that limit their investment to gold but there are too few to create a viable sector.

Our analysis suggests that gold and precious metals funds are investing predominantly in mining companies that produce gold or precious metals. There is one fund that notes that it can invest in gold bullion securities. When we consulted on including ETFs in IA sectors we noted that ETCs [Exchange Traded Commodities] would not be included. However, ETFs set up as UCITs and investing in mining shares would be eligible. In light of the above, we believe that we have expressed the core investment parameters appropriately. However, we are keen for you to express views if you disagree.

Consultation questions:

21. Do we need to specify what should count towards 'other precious metals' given that these funds are principally investing in mining companies? If we do, what should we specify?
22. Do we need to include a geographic diversification requirement in the definition?
23. Should we specify that this sector is not appropriate for performance comparisons, or are gold/precious metals sufficiently correlated to be considered as one asset class?

8. Commodities and Natural Resources

Funds that invest at least 80% of their assets in commodity or natural resources related equities. [31 funds]

Specific sector notes:

- *Funds may be diversified and offer broad exposure to commodities and natural resources, others may focus on specific industries/sectors. Investors should conduct their own due diligence. Owing to the diversity of approaches, like for like performance comparisons are inappropriate.*

Comments on setting the definition:

Similarly to the proposed Infrastructure sector, the creation of a commodities and natural resources sector would provide a signpost to all types of funds whilst noting that like for like comparisons may be inappropriate. Our analysis has included funds focused on a specific natural resource such as energy, water or timber, as well as including diversified funds. There are a variety of benchmarks that are used by managers e.g. MSCI World Select Natural Resources, S&P Global Natural Resources, EMIX Mining and Energy. Some of the indices include some natural resources but not others, for example the EMIX index excludes water and timber.

Consultation questions:

24. Should focused water, energy and timber funds be included in a commodities and natural resources sector? If they are not included, they would remain in the Specialist sector.
25. Should we specify what should be included in 'commodities'? If so, what should be included? Or rather than trying to define commodities should we make reference to any stock held in a relevant index in the definition?

PART 2: Allocation of funds to new sectors

The IA analysis has preliminarily allocated existing funds from the Global and Specialist sectors into one of the new granular sectors proposed in Part 1. The ETF submissions have also been included. The list of funds allocated to each sector is provided in an appendix on page 15.

The IA will now write to all firms that have funds/ETFs that could be impacted by the changes and share the details that set out the proposed new classifications and peer groups. This is to initially garner views on the proposals.

The correspondence will contain lists that show which funds have been provisionally allocated into which sector, subject to support for the consultation proposals. These lists represent the views of IA staff with regard to how a fund may be classified. They are subject to confirmation and amendment of the classification choice by the managers of the funds that will only be finalized after the consultation process has been concluded.

Emails will be sent to managers following this consultation launch. Firms with a fund that is impacted by this change should check the new sector into which their fund has been allocated. When responding to the consultation, the firm should confirm if they are content with the sector into which their fund has been allocated or note an alternative if they are unhappy.

Alternatively, managers can confirm how they would like their existing funds/ETFs to be classified by filling in the template below.

Fund Name	ISIN of primary share class	Existing sector	New sector

The IA will be writing to all firms with a fund that appears to be impacted before implementing any changes. Firms that have submitted ETFs for classification will also be contacted. Firms that do not respond could be placed in the sector that IA staff feel is most appropriate based on analysis of the fund holdings.

All sector classifications could be subject to change depending on the views expressed in the consultation response.

Responses should be sent to sectors@theia.org

Significance of sector changes where firms are using IA sectors as benchmarks

We are aware that where firms use an IA sector as a benchmark, if a fund elects to move to a newly created sector, they may need or wish to change the fund's benchmark. If the IA chooses to close a sector, this would require the manager to change the benchmark as a forced change. In both cases, firms would have to conduct an internal governance review, update the fund documentation and, typically in the case of target/constraint benchmarks, notify the FCA and shareholders.

The IA has therefore updated its guidance note on IA sectors and benchmarks, which can be found on the Members pages of the IA website. The note introduces a policy that will allow at least three to four months between the confirmation of a definitive sector change and implementation of the changes. The implementation of the sector changes would include confirmation of the sector definition, the list of funds that would populate the sector and the notification of the definition and fund list to the data vendors who create the IA sector average indices.

For the new sectors proposed in this consultation, we believe the impact should be minimal. The IA Global sector will remain following the creation of the new sectors. Whilst we believe that it is best practice for funds that are using the IA sectors as benchmarks to opt for the sector that the fund is classified to, if a fund continued to meet the Global sector classification criteria then it could continue to use the Global sector as a comparator benchmark until or if it wishes to change the benchmark. Moreover, many of the funds that will populate the new sectors will be drawn from the Specialist sector, where performance comparisons are not appropriate. In the IA's view, it is not advisable for firms to use the Specialist sector as a comparator benchmark so we would not expect firms to be doing this.

Where funds are using the IA Global sector as a benchmark and wish to change the fund's benchmark to one of the proposed sectors, managers should also consult the Guidance on Classification of Change Events, issued jointly by the IA and the Depositary and Trustee Association (DATA). It provides guidance on how changes to authorised funds may be treated for the purposes of investor approval or notification under COLL 4.3.

It can be found [here](#)

Appendix 1: List of funds split by proposed sector

For ETFs we have indicated the sector that the ETF provider has provisionally selected in brackets as ETFs have not yet been admitted to the IA Sectors classification scheme.

1. Latin America

ISIN	Fund Name	Current Sector	Proposed sector
GB00B4R0SD95	ASI Latin American Equity Fund	Specialist	Latin America
LU1070051021	Alquity Latin America Fund	Specialist	Latin America
IE00B64MCJ60	Baring Latin America Fund Class A USD Inc	Specialist	Latin America
LU0252970081	BlackRock Global Funds Latin American	Specialist	Latin America
IE00BFZ0XG64	Brown Advisory Latin American Fund	Specialist	Latin America
IE00B64CBB12	Comgest Growth Latin America	Specialist	Latin America
LU1033664027	Fidelity Funds Latin America Fund	Specialist	Latin America
GB00B64TSF56	Stewart Investors Latin America Fund	Specialist	Latin America
GB00B8N44B34	Invesco Latin American Fund (UK)	Specialist	Latin America
LU0053687314	JPM Latin America Equity Fund	Specialist	Latin America
LU0995139770	Janus Henderson Latin American Fund	Specialist	Latin America
GB00B909HH53	Liontrust Latin America Fund	Specialist	Latin America
LU0808562291	MFS Meridian Latin American Equity Fund	Specialist	Latin America
LU0106259392	Schroders ISF Latin American	Specialist	Latin America
GB0031904146	Scottish Widows Latin American Fund	Specialist	Latin America
GB00B8BQ6V57	Threadneedle Latin America Fund	Specialist	Latin America
IE00B4TS3815	HSBC MSCI EM LATIN AMERICA UCITS ETF	(Specialist)	Latin America
IE00B27YCK28	iShares MSCI EM Latin America UCITS ETF (Dist)	(Specialist)	Latin America

2. India

ISIN	Fund Name	Current Sector	Proposed sector
LU0837977031	Aberdeen Standard SICAV I - Indian Equity Fund	Specialist	India
LU1070052185	Alquity India Fund	Specialist	India
LU0724618193	BlackRock Global Funds India	Specialist	India
IE00BD5HXH43	Comgest Growth India	Specialist	India
LU0457960192	Fidelity Funds – India Focus Fund	Specialist	India
GB00B1FXTG93	Stewart Investors Indian Subcontinent Sustainability Fund	Specialist	India
GB00BDG1BM66	FSSA Indian Subcontinent All Cap Fund	Specialist	India
LU0768358961	Franklin India Fund	Specialist	India
LU0858290173	Goldman Sachs India Equity Portfolio	Specialist	India
LU0066902890	HSBC GIF Indian Equity	Specialist	India
LU0267983889	Invesco India Equity Fund – A share	Specialist	India
LU0058908533	JPM India Fund	Specialist	India
GB00B4TZHH95	Jupiter India Fund	Specialist	India
LU0946219929	Jupiter India Select	Specialist	India
GB00B1L6DV51	Liontrust India Fund	Specialist	India
LU0594558263	Matthews Asia India Fund	Specialist	India
IE00B3SHFF36	Nomura Funds Ireland - India Equity Fund	Specialist	India
LU0859479155	Pictet-Indian Equities	Specialist	India
LU0859480161	Pictet India Index	Specialist	India
LU0264410993	Schroder ISF Indian Equity	Specialist	India
GB00BF785M86	Schroder India Equity Fund	Specialist	India
IE00BYPC7S51	UTI India Dynamic Equity Fund	Specialist	India
IE00BHZRQZ17	Franklin FTSE India UCITS ETF	(Specialist)	India

3. Global Smaller Companies

ISIN	Fund Name	Current Sector	Proposed sector
GB00B7KVX245	ASI Global Smaller Companies Fund	Global	Global Smaller Companies
LU1136182059	Allianz Global Small Cap Equity	Global	Global Smaller Companies
LU1253914516	Goldman Sachs Global Small Cap CORE Equity Portfolio	Global	Global Smaller Companies
IE00BVVB5N62	HERMES GLOBAL SMALL CAP EQUITY FUND	Global	Global Smaller Companies
GB00B8N46D97	Invesco Global Smaller Companies Fund (UK)	Global	Global Smaller Companies
LU1833119990	Kempen (Lux) Global Small-cap Fund	Global	Global Smaller Companies
GB00B29MXF68	Liontrust Global Smaller Companies	Global	Global Smaller Companies
GB00B8NC4D98	McInroy & Wood Smaller Companies Fund	Global	Global Smaller Companies
IE00BJLN8Z17	American Century Global Small Cap Equity Fund	Global	Global Smaller Companies
LU0240878321	Schroder ISF Global Smaller Companies	Global	Global Smaller Companies
IE00B3X1NT05	Vanguard Global Small Cap Index Fund	Global	Global Smaller Companies
IE00BF4RFH31	iShares MSCI World Small Cap U	(Global)	Global Smaller Companies

4. Financials

ISIN	Fund Name	Current Sector	Proposed sector
GB00BWK25Q05	ASI Financial Equity Fund	Specialist	Financials
GB00B5BHKC62	AXA Framlington Financial Fund	Specialist	Financials
IE00B54J6879	Dodge & Cox Worldwide Funds plc - Global Stock Fund	Global	Financials
LU1033663136	Fidelity Funds – Global Financial Services Fund	Global	Financials
GB00B8N45K99	Invesco Global Financial Capital Fund (UK)	Specialist	Financials
GB0031919235	Janus Henderson Global Financials Fund	Specialist	Financials
GB00B5LG4657	Jupiter Financial Opportunities Fund	Specialist	Financials
LU0946220695	Jupiter Global Financial Innovation Fund	Specialist	Financials
GB00B58D9P37	Jupiter Global Financial Innovation Fund	Specialist	Financials
IE00BF47CV65	Merian Financials Contingent Capital Fund	Specialist	Financials
IE00B6429P10	Polar Capital Financial Opportunities Fund	Specialist	Financials
IE00B4X2MP98	Polar Capital Funds PLC - Global Insurance Fund	Specialist	Financials
LU1757833261	Robeco Global FinTech Equities	Specialist	Financials
IE00B2B08X16	Denker Global Financial Fund	Global	Financials
IE00BGPBVB76	Wellington Management Funds (Ireland) - Wellington FinTech Fund	Specialist	Financials
IE00BM67HL84	Xtrackers MSCI World Financials UCITS ETF 1C	(Global)	Financials
IE00BCHWNT26	Xtrackers MSCI USA Financials UCITS ETF 1D	(North America)	Financials
IE00B4JNQZ49	iShares S&P 500 Financials Sector UCITS ETF	(Specialist)	Financials
GB00B796C343	Aptus Global Financials Fund	Global Equity Income	Financials

5. Healthcare

ISIN	Fund Name	Current Sector	Proposed Sector
LU1934454544	AB SICAV I - International Health Care Portfolio	Specialist	Healthcare
GB00BRJZVQ71	AXA Framlington Health Fund	Specialist	Healthcare
LU1033663300	Fidelity Funds - Global Health Care Fund	Global	Healthcare
LU1775982595	Invesco Global Health Care Fund	Specialist	Healthcare
GB00B0CNH387	Legal & General Global Health & Pharmaceutical Index Trust	Global	Healthcare
LU0448836782	Pictet-Health	Specialist	Healthcare
IE00B3K93X10	Polar Capital Healthcare Opportunities Fund	Specialist	Healthcare
IE00BPRBXV28	Polar Capital Funds PLC - Healthcare Blue Chip Fund	Specialist	Healthcare
GB00B76V7Q08	Schroder Global Healthcare Fund	Global	Healthcare
IE00BF2ZVD78	Wellington Global Health Care Equity Fund	Global	Healthcare
IE00BM67HK77	Xtrackers MSCI World Health Care UCITS ETF 1C	(Global)	Healthcare
IE00BCHWNW54	Xtrackers MSCI USA Health Care UCITS ETF 1D	(North America)	Healthcare
IE00BYZK4776	iShares Healthcare Innovation UCITS ETF	(Specialist)	Healthcare
IE00B43HR379	iShares S&P 500 Health Care Sector UCITS ETF	(Specialist)	Healthcare
LU0329426950	GAM Multistock - Health Innovation Equity	(North America)	Healthcare

6. Infrastructure

ISIN	Fund Name	Current Sector	Proposed Sector
LU0995048112	AMP Capital Global Listed Infrastructure Fund	Global	Infrastructure
GB00BDR8GH68	BNY Mellon Global Infrastructure Income Fund	Global	Infrastructure
GB00B24HJL45	First Sentier Global Listed Infrastructure Fund	Global	Infrastructure
GB00BK0TB032	FP Foresight Global Real Infrastructure Fund	Global	Infrastructure
GB00BF0VS922	FP Foresight UK Infrastructure Income Fund	Specialist	Infrastructure
LU1046546229	Goldman Sachs North America Energy & Energy Infrastructure Equity Portfolio	Specialist	Infrastructure
IE00B5NXD345	Lazard Global Listed Infrastructure Equity Fund	Global	Infrastructure
GB00BF0TZG22	Legal & General Global Infrastructure Index Fund	Global	Infrastructure
GB00B1W2BX03	LF Macquarie Global Infrastructure Securities Fund	Global	Infrastructure
GB00B8BSTB27	LF Canlife Global Infrastructure Fund	Specialist	Infrastructure
GB00BF00R928	M&G Global Listed Infrastructure Fund	Global	Infrastructure
IE00B3T1L784	Russell Investments OW Global Listed Infrastructure Fund	Global	Infrastructure
IE00BDFDL125	Sanlam Real Assets Fund	Specialist	Infrastructure
GB00BZ17GL78	ARC Time UK Infrastructure Income Fund	Specialist	Infrastructure
GB00BYVB3M28	VT GRAVIS UK INFRASTRUCTURE INCOME FUND	Specialist	Infrastructure
IE00BD0BX152	First Trust North American Energy Infrastructure Income UCITS Fund	Specialist	Infrastructure
IE00B2NPL135	iShares Emerging Market Infrastructure UCITS ETF	(Specialist)	Infrastructure
IE00B1FZS467	iShares Global Infrastructure UCITS ETF	(Specialist)	Infrastructure
GB00BMP2ZL03	Architas Diversified Real Assets	Specialist	Infrastructure
GB00B4KQS127	FP Russell Investments Real Assets	Specialist	Infrastructure
LU1033663722	Fidelity Funds – Global Infrastructure Fund	Global Equity Income	Infrastructure
GB00BZ01WT03	Legg Mason IF RARE Global Infrastructure Income Fund	Global Equity Income	Infrastructure
GB00BD3H9L21	LF Miton Global Infrastructure Income Fund	Global Equity Income	Infrastructure
GB0031637738	Premier Global Infrastructure Income Fund	Global Equity Income	Infrastructure

7. Gold & Precious Metal

ISIN	Fund Name	Current Sector	Proposed Sector
GB00B5ZNJ896	BlackRock Gold & General Fund	Specialist	Gold & Precious Metals
GB00BYQ2JY43	DMS Charteris Gold and Precious Metals Fund	Specialist	Gold & Precious Metals
GB00B3YQ8554	ES Gold & Precious Metals Fund	Specialist	Gold & Precious Metals
GB00B8510Q93	LF Ruffer Gold Fund	Specialist	Gold & Precious Metals
GB00BH57BR88	Junior Gold Fund	Specialist	Gold & Precious Metals
IE00BYVJRH94	Merian Gold & Silver Fund	Specialist	Gold & Precious Metals
GB00B1XFGM25	Investec Global Gold Fund	Specialist	Gold & Precious Metals
GB00B98Y2S82	Quilter Investors Precious Metals Equity Fund	Specialist	Gold & Precious Metals
GB00B3RJHY30	Smith & Williamson Global Gold & Resources Fund	Specialist	Gold & Precious Metals
IE00B6R52036	iShares Gold Producers UCITS ETF	(Specialist)	Gold & Precious Metals

8. Commodities and Natural Resources

ISIN	Fund Name	Current Sector	Proposed Sector
LU0252969661	BlackRock Global Funds New Energy A4DS GBP	Specialist	Natural Resources
LU0252969075	BlackRock Global Funds World Energy A4DS GBP	Specialist	Natural Resources
LU0252968341	BlackRock Global Funds World Mining	Specialist	Natural Resources
GB00B6865B79	BlackRock World Resources Income Fund	Specialist	Natural Resources
LU0992629401	Carmignac Portfolio Commodities	Specialist	Natural Resources
LU1892829315	Fidelity Funds - Sustainable Water & Waste Fund	Global	Natural Resources
GB00BHR44F64	Fidelity Sustainable Water & Waste Fund	Global	Natural Resources
IE00B7LWDH14	Guinness Alternative Energy Fund	Global	Natural Resources
IE00B6XV0016	Guinness Global Energy Fund	Global	Natural Resources
GB00B88MP089	JPM Natural Resources Fund	Specialist	Natural Resources
LU0640921382	LO Funds - Commodities Risk Parity	Specialist	Natural Resources
GB00B84RD695	Marlborough ETF Commodity Fund	Specialist	Natural Resources
GB00B049PC91	Investec Global Energy Fund	Specialist	Natural Resources
GB00B2QVX896	Investec Enhanced Natural Resources Fund	Specialist	Natural Resources
LU0448836949	Pictet-Clean Energy	Global	Natural Resources
LU0448836600	Pictet-Water	Global	Natural Resources
LU0448837087	Pictet-Timber	Specialist	Natural Resources
GB00B7Y0MP39	Quilter Investors Natural Resources Equity Fund	Specialist	Natural Resources
LU0969110849	Schroder ISF Global Energy	Global	Natural Resources
GB00B56FW078	TB Guinness Global Energy Fund	Specialist	Natural Resources
LU1382644919	T. Rowe Price Funds SICAV Global Natural Resources Equity	Specialist	Natural Resources
GB00BD446J95	T. Rowe Price Funds OEIC Global Natural Resources Equity	Specialist	Natural Resources
GB00BFN4H792	VT GRAVIS CLEAN ENERGY INCOME FUND	Global	Natural Resources
IE00BM67HM91	Xtrackers MSCI World Energy UCITS ETF 1C	(Global)	Natural Resources
IE00BM67HS53	Xtrackers MSCI World Materials UCITS ETF 1C	(Global)	Natural Resources
IE00BCHWNS19	Xtrackers MSCI USA Energy UCITS ETF 1D	(North America)	Natural Resources
IE00B1XNHC34	iShares Global Clean Energy UCITS ETF	(Specialist)	Natural Resources
IE00B27YCF74	iShares Global Timber & Forestry UCITS ETF	(Specialist)	Natural Resources
IE00B1TXK627	iShares Global Water UCITS ETF	(Specialist)	Natural Resources
IE00B6R51Z18	iShares Oil & Gas Exploration & Production UCITS ETF	(Specialist)	Natural Resources
IE00B42NKQ00	iShares S&P 500 Energy Sector UCITS ETF	(Specialist)	Natural Resources
IE00B4MKCJ84	iShares S&P 500 Materials Sector UCITS ETF USD (Acc)	(Specialist)	Natural Resources