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■ Section 1: Consumer Duty approach

Our Consumer Duty

In July 2022, the Financial Conduct Authority (FCA) published a Policy Statement and Finalised Guidance setting out final rules and guidance on the new Consumer Duty, being that *“a firm must act to deliver good outcomes for retail customers”*.

As part of the Consumer Duty, firms must act in good faith towards customers, avoid causing them foreseeable harm, and enable and support them to pursue their financial objectives.

The Consumer Duty introduces new rules and guidance to ensure that:

- Products and services are designed to meet the needs, characteristics and objectives of a specified target market.
- Products and services provide fair value with a reasonable relationship between the price consumers pay and the benefit they receive.
- Firms communicate in way that supports consumer understanding and equips consumers to make effective, timely and properly informed decisions.
- Firms provide support that meets consumers’ needs throughout the life of the product or service.

Within the requirements placed on firms by the FCA, were several milestone dates which allowed for orderly planning, engagement with those in our product and services distribution chains and compliance with the new Consumer Duty by the end of July 2023.

Alpha Real Capital LLP (“Alpha”) and Alpha Real Property Investment Advisers LLP, trading as TIME Investments (“TIME”) (both members of the Alpha Real Capital Holdings Limited group), through our joint dedicated working group, which is formed of members of both firms, have performed a detailed review of the requirements of the Consumer Duty. Using our implementation plan, we have performed reviews of documentation and procedures, or shall have completed our reviews by July 2023, required for compliance with the Consumer Duty, to ensure across both firms we always put consumers at the heart of our business and focus on delivering good outcomes for our clients.

We have ensured that each of the relevant governing bodies at both Alpha and TIME are engaged in and responsible for ensuring that the Consumer Duty is properly embedded within each firm, and we have identified senior managers to be accountable for the outcomes their customers are experiencing, where that is relevant.

As part of our review, we considered the product and services in scope of the Consumer Duty and considered each element of the FCA’s Policy Statement as applicable, performing reviews (including confirmatory reviews) and identifying any changes which would be helpful to delivering the overall objective of the principle.

We have reviewed our analysis for product design (including on an ongoing basis, not simply at the initial design and launch time) to ensure that our products or services continue to meet our target customers’ needs including that they provide fair value. We have enhanced our monitoring and review frequencies to ensure the outcomes our customers are experiencing in practice are aligned to the product design and expectations and we will take action to address any risks to good customer outcomes.

We have performed gap analysis generally in accordance with the expectations of the FCA and where there are amendments have planned for implementation. This includes where we can make changes, such as better identifying the characteristics of vulnerability of the target market and supporting any vulnerable customers to ensure their needs are specifically addressed, where we have that direct relationship or support those in our distribution chain where they may have such direct relationship.

■ Section 1: Consumer Duty approach

To provide some further insight into our work regarding Consumer Duty we have compiled answers to some of the regular questions we have been asked:

FAQs

What engagement have you performed with those in the distribution chains regarding Consumer Duty?

In March 2023, we sent a questionnaire to a large segment of our known distribution chain for our in-scope funds and services to (a) understand what they require of us (as product manufacturers) to meet their obligations under the Consumer Duty and (b) outlining the type of information and data we will require from our distribution partners to support our oversight of our products and services and ensure the end customer is receiving a good outcome. The feedback received has assisted us in our preparations for Consumer Duty.

Do you have target market guidance?

Yes. This has been reviewed in the context of Consumer Duty. The latest version is available at both: www.alpharealcapital.com and www.time-investments.com and section three of the Consumer Duty pack.

What is your approach to satisfying the price and value outcome?

For each of our in-scope FCA authorised funds (which are constituted either as non-UCITS retail scheme or UCITS), we already deliver an annual Assessment of Value in accordance with the FCA Handbook and the external report for each fund is available on the website and in section four of this Consumer Duty pack.

How is the firm testing the effectiveness of its communications?

All our investor information has been reviewed in the context of Consumer Duty and concluded that our literature is in line with the expectations under the Consumer Duty.

As part of our questionnaire to those in our distribution chains we also posed the following queries regarding communications:

- What changes to existing information or additional information, if any, do you consider is required to assist in your determination of the distribution strategy of the product?
- Do you think any further documents or aids would be useful for customers you identify as being customers with characteristics of vulnerability?
- We sought feedback regarding if any changes were needed to our documentation to:
 - Better understand the characteristics of the product or service
 - Better understand the identified target market
 - consider the needs, characteristics and objectives of any customers with characteristics of vulnerability
 - identify the intended distribution strategy
 - ensure the product or service will be distributed in accordance with the needs, characteristics and objectives of the target market
- Do you have any feedback on the effectiveness of the manufacturers communications and any changes, if any, you would propose?

The feedback received has been informative and appropriately utilised to enhance our communications to clients.

For further information regarding our approach to the Consumer Duty and indeed information for our distributors necessary for their requirements under the Consumer Duty, please refer to the Consumer Duty distribution chain aid which can be found at section two of this Consumer Duty pack.

28 April 2023

■ Section 2: Distribution chain – Q&A

Consumer Duty: Distribution chain aid

In accordance with the requirements under the FCA Policy Statement [PS22/9], this document is intended to be an aid to those in the distribution chain of our Fund(s) named below to assist in your obligations under the terms of the Consumer Duty.

This document will be updated periodically.

Fund Name: ARC TIME Property Long Income & Growth PAIF, a sub-fund of ARC TIME:Funds II (PLIG)

Fund Name: ARC TIME Property Long Income & Growth Feeder Trust, a sub fund of ARC TIME:Trusts II (PLIGFT)

	Key considerations	Details
Product and services	The firm has specified the target market of its funds and services to the level of granularity necessary and we have identified the intended distribution strategy for the target market.	We have reviewed our existing target market guidance and distribution strategy as part of our Consumer Duty review and the latest version is available at Section 3 of this pack. The product is co-manufactured by Alpha and TIME.
	The firm has satisfied itself (for example through testing) that its funds and services are well designed to meet the needs of consumers in the target market and perform as expected.	For each of our Funds, at the design phase and with oversight of our new product committees and the ACD Board, we perform a full set of analytics in accordance with the FCAs Product Governance Rules (PROD). This includes, amongst other considerations, ensuring the Fund is designed to meet the needs of an identified target market (which we detail within the target market guidance, which we perform in accordance with the Investment Association's recommended approach).
	The firm has identified if the fund or service has features that could risk harm for groups of customers with characteristics of vulnerability by considering the needs, characteristics and objectives of any customers with characteristics of vulnerability.	The Fund is a non-UCITS retail scheme and may be made available to any type of investor. We have not identified any specific features of the funds that could risk harm for specific groups of customers with vulnerable characteristics.

■ Section 2: Distribution chain – Q&A

	Key considerations	Details
Product and services (continued)	The firm is sharing all necessary information with other firms in the distribution chain.	<p>We have the following documentation available to those in our distribution chain:</p> <ul style="list-style-type: none"> ■ Application Form ■ Prospectus ■ Instrument ■ NURS KIID ■ Fund summary ■ Factsheet ■ Target market guidance ■ Distribution strategy ■ Assessment of Value ■ Annual Report & Half Yearly Report ■ Fund pricing and distribution data ■ Due diligence questionnaire <p>The above set of documentation is considered to provide sufficient information for those in the distribution chain to meet their requirements under the Consumer Duty.</p>
	The firm is monitoring that distribution strategies are being followed and that products and services are being correctly distributed in accordance with the needs, characteristics and objectives of the target market.	We will be seeking enhanced information from those in our distribution chain to help improve our understanding of how the Fund is delivering good outcomes for the retail customer, with whom we usually do not have a direct relationship as the vast majority of investors in the Fund are via platforms and wealth managers.
	The firm is taking action to mitigate the risk of foreseeable harm to customers.	Yes, we are actively engaged in ensuring all risks are monitored and mitigated where possible. This analysis includes a review of customer feedback, complaints and other similar data.
Price and value	The firm is satisfied that it is considering all the relevant factors and available data as part of its fair value assessments.	Yes. Please see the annual Assessment of Value. This is available at Section 4 of this pack.
	The firm has gained insights for its value assessments by benchmarking the price and value of its products and services against similar ones in the market.	Yes, this is performed in accordance with the terms of the FCA Handbook.
	The firm has assessed that the price and value of its older products has kept up with market developments.	We confirm that the Assessment of Value is performed annually, and all recommendations considered by the ACD Board, and the independent directors appointed to that forum.

■ Section 2: Distribution chain – Q&A

	Key considerations	Details
Price and value (continued)	The firm can demonstrate that its products and services are fair value for different groups of consumers, including those in vulnerable circumstances or with protected characteristics.	<p>Yes. Our Assessment of Value includes a consideration of “fair value” by each class of share of the Fund, each class has different eligibility criteria for different groups of investors.</p> <p>Our analysis includes consideration of whether there are any variations in the conclusions for those in vulnerable circumstances or with protected characteristics. We will seek to obtain further information from our distributor partners on an ongoing basis so that we can further assess whether the funds deliver good outcomes for the retail customers who are vulnerable or have protected characteristics, with whom we usually do not have a direct relationship as the vast majority of investors in the Fund are via platforms and wealth managers.</p>
	Where the firm is charging different prices/charges to separate groups of consumers for the same fund or service, the firm is satisfied that the pricing/charging is fair for each group.	Yes. This is included in the assessment of value and why it is ultimately considered at share class level.
	The firm has taken actions as a result of its fair value assessments and is ensuring the actions are effective in improving consumer outcomes.	Correct. Every year our Assessment of Value delivers useful recommendations of where we can improve the outcomes for the benefit of the Funds’ investors, and we then implement those recommendations.
	The firm uses data, MI and other intelligence to monitor the fair value of its funds and services on an ongoing basis. The firm is regularly reviewing this material and taking actions as a result.	Correct. Prospectively we shall be asking those in our distribution chain to deliver data to us so we have a better understanding of the value to the ultimate retail investor, where we may not have the direct relationship and therefore do not always know all incremental charges that may be applied throughout the distribution chain (outside of our fund charges) which may be applied so we can ensure the fund continues to provide fair value to all investors.

■ Section 2: Distribution chain – Q&A

	Key considerations	Details
Customer understanding	The firm is satisfied that it is applying the same standards and testing capabilities to ensure communications are delivering good customer outcomes, as they are to ensuring they generate sales and revenue.	Yes, most of our communications are structured under the terms of the FCA Handbook (namely COLL and COBS). All sales and marketing activities are focused on authorised financial advisers who will in turn assess the suitability of the funds for their clients. We do not typically communicate directly with the vast majority of the end retail customers as we usually do not have a direct relationship as the vast majority of investors in the Fund are via platforms and wealth managers.
	The firm is using certain insights to decide how best to keep customers engaged in their customer journey, whilst also ensuring its customers have the right information at the right time to make decisions.	Beyond the website and direct communications (such as delivery of notices etc) with investors, we use different communication channels such as roadshows and webinars to engage with financial advisers, platforms, wealth managers who manage the direct relationship with the different segments of our investors and we try to ensure that we provide as much education to these parties so that they might ensure that the end investors have the right information at the right time to make decisions.
	The firm has tested the effectiveness of its communications and has taken actions as a result of the findings.	Yes, we conducted a recent Consumer Duty questionnaire which was sent to a large sample of our distributors to obtain information on the effectiveness of our current communications for clients and we were able to ascertain feedback. And implement any lessons where relevant.
	The firm adapts its communications to meet the needs of customers with characteristics of vulnerability and how ensures these adaptations are effective.	Yes - but we continue to review our communications specifically for customers with vulnerable characteristics and we will look to make adequate provision for vulnerable customers going forward noting that we do not typically have a direct relationship as the vast majority of investors in the Fund are via platforms and wealth managers.
	The firm ensures that its communications are equally effective across all channels it uses, and testing is done to ensure this.	Yes.
	The firm uses data, MI and feedback in its ongoing monitoring of the impact of its communications on customer outcomes. This data is reviewed, and actions are taken as a result.	Yes, we collate a substantial amount of data and indeed this is utilised in our annual assessment of value analytics. We propose to enhance data collection, notably via those in our distribution chain, as part of our ongoing engagement with consumer duty.

■ Section 2: Distribution chain – Q&A

	Key considerations	Details
Customer support	The firm has satisfied itself that its customer support is effective at meeting customer needs regardless of the channel used.	Yes, we have dedicated customer support teams for investors, platforms, wealth managers and financial advisers. Our customer service team has been regularly voted as providing excellent service and we have a dedicated client services contact centre.
	The firm has made assessments about whether its customer support is meeting the needs of customers with characteristics of vulnerability. The firm is using data, MI and customer feedback to support these assessments.	Yes - but we continue to review our customer support specifically for customers with characteristics of vulnerability and the data provided by our distribution partners will help us ensure that we can provide the best service to all investors including those who are vulnerable or have protected characteristics.
	The firm has satisfied itself that it is at least as easy to switch or leave its funds and services as it is to buy them in the first place.	Yes. This is included in the terms of the funds' Prospectus and detailed instructions are included as to the procedure to be followed.
	The firm has satisfied itself that the quality of any post-sale support is as good as the pre-sale support.	Yes. TIME has won awards for its post-sale service at the Financial Adviser Service Awards, where it was awarded 5-stars.
	The firm is using data, MI and feedback to monitor the impact its consumer support is having on customer outcomes. This data is being monitored regularly and actions are being taken as a result.	Yes, and we propose to enhance the data collection as part of our ongoing engagement with consumer duty.
	The firm conducts effective monitoring and oversight of its outsourced or third-party service providers, and it is confident that these services meet the consumer support standards.	Most of the services are provided by Alpha or TIME (both within the Alpha group). The only external service providers are the Collection Agency, Depositary and Auditor.

■ Section 3: Target market guidance

Only all categories read together define a target market for a single product.

The list of categories should not be extended by any distributor/intermediary.

“Y” signifies compatibility between the product and the clients’ needs/characteristics/objectives

“Neutral” signifies neither compatibility nor incompatibility

“N” signifies incompatibility between the product and the clients’ needs/characteristics/objectives

Guidance notes

Investor type	Retail = Y Professional = Y Eligible Counterparty = Y	The Fund is a non-UCITS retail scheme (NURS). The intended categories of investors are retail, professional, and institutional investors.
Knowledge and/or experience	Investor with Basic Knowledge = Y / Neutral Informed Investor = Y Advanced Investor = Y	The Fund is a non-UCITS Retail Scheme (NURS) authorised by the FCA and is intended for a wide range of investors including retail, professional investors and institutional investors. Offshore investors may also participate in the Fund. Investors may therefore have a basic level of knowledge and experience.
Ability to bear losses	The investor can bear no loss of capital; capital 100% guaranteed = N Investor seeking to preserve capital or can bear losses to a level specified by the product = N The investor can bear losses up to 100% = Y The investor can bear losses beyond the investment amount = N	The Fund is targeted at investors with experience or who understand investments which place capital at risk and must be able to accept losses. Investors capital is at risk and the investor may not get back what they invest. The investor may bear a loss up to the amount they invested and are not liable for the debts of the Fund.
Client objectives	<div> Return profile: Preservation = N Growth = Y Income = Y </div> <div> Time horizon: Short (e.g. <2 years) = Neutral Medium (e.g. >2 years) = Y Long (e.g. > 5 years) = Y </div>	<p>The aim of the Fund is to manage investor capital while seeking to provide a consistent income stream with long term capital growth prospects.</p> <p>Although shorter term investment is permitted, the Fund is designed and managed to support longer-term investment and active trading is discouraged. Short-term or excessive trading into and out of the Fund may harm performance by disrupting the investment management strategy and by increasing expenses. The ACD may at its discretion refuse to accept applications for, or switching or conversion of, Shares, especially where transactions are deemed disruptive, particularly from possible market timers or investors who, in its opinion, have a pattern of short-term or excessive trading or whose trading has been or may be disruptive to the Fund.</p> <p>The Fund is not suitable for investors who are not willing or able to lose up to 100% of their investment. The Fund is also not suitable for those investors who are seeking a fund for active short-term trading or are not able to accept the risk of a delayed return of their capital in some circumstances.</p>

■ Section 3: Target market guidance

		Guidance notes
Client needs	<p>Usage: Hedging = Neutral Option or Leveraged = Neutral Other; tax management = Y</p> <p>Access (withdrawals): Ready access - normal market conditions = Y Ready access with restrictions = Y Access uncertain = Y</p>	<p>The Fund may be a solution for those investors who wish to participate in collective investment schemes that carry on Property Investment Business and who wish to seek to achieve an income return with some capital growth in the long term.</p> <p>The Fund may be held in an ISA which provides management of income tax and capital gains tax positions.</p> <p>The Fund is a PAIF which provides for a certain tax treatment for the Fund and distributions made by it (and received by shareholders).</p> <p>Whilst the Fund is an open-ended investment company and deals daily - each of these characteristics provide for ready access under normal market conditions. However, as some of the Fund is made up of investments in Real Property, the UK legal process for selling commercial freehold ground rents and/or commercial freehold property which benefit from long leases takes a considerable length of time. Therefore at times it may be difficult to make investments/sell assets to meet investors' requests to buy/sell shares in the Fund over short time periods.</p>
Risk (where SRRI and SRI are n/a, the qualitative factor is provided)	<p>Capital is at risk and the investor may get back less than they invested.</p> <p>There is no guarantee as to investment performance.</p> <p>Liquidity is not guaranteed; shareholders should note the provisions for suspension of issue and redemption of shares, which may operate independently.</p> <p>There is no guarantee that the Fund will retain its PAIF status.</p>	<p>By the nature of direct property and the time and other factors involved in arranging sales and realising the proceeds there from, it should be appreciated that some of the underlying assets are primarily relatively illiquid assets when compared with other asset classes such as listed equities or bonds. Whilst the ACD will pursue a cautious liquidity policy, this Fund is intended for investors who can accept the risks associated with making potentially illiquid investments in direct property.</p> <p>The Prospectus and KIID should be referred to for further details of risks.</p>

Distribution strategy

Should be assigned Retail or Professional or Both or Neither (R, P, B and N respectively).

"Professional" or "Both" are deemed to include Eligible Counterparties.

Channel	<p>Execution Only = B Execution with Appropriateness Test or Non-Advised Services = B Investment Advice = B Portfolio Management = B</p>	<p>ARC:TIME Property Long Income & Growth is a sub-fund of ARC TIME:Funds II, an FCA authorised Non-UCITS Retail Scheme.</p>
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This target market guidance for ARC:TIME Property Long Income & Growth has been prepared by Alpha Real Capital LLP ('Alpha') for distributors of TIME:Property Long Income & Growth and should be read in conjunction with the Prospectus and KIID. Alpha is authorised and regulated by the Financial Conduct Authority. Alpha is the Authorised Corporate Director of ARC TIME Property Long Income & Growth.

All information correct as at April 2023.

■ Section 4: Assessment of Value

Introduction

Alpha Real Capital is the Authorised Corporate Director (“ACD”) to each of the Funds listed in this report. The ACD is required under the FCA Handbook to conduct an annual Assessment of Value with regards to each authorised fund managed and to report publicly the conclusions. The ACD reports annually on or before 31 July each year.

The Assessment of Value reporting is designed to strengthen both fund governance and transparency to investors. The ACD has a duty to act in the best interests of investors and the annual Assessment of Value is designed to strengthen this existing duty of care to investors.

The FCA Handbook requires the ACD to report on seven non-exhaustive criteria in which value should be assessed, essentially reflecting three main elements: cost, performance against objectives, and quality of service. It is the responsibility of the ACD’s Board to apply effective oversight and challenge on the assessments. In order to ensure that the oversight is rigorous and impartial our ACD Board includes independent directors. One Board member has overall responsibility for the assessment.

The FCA’s assessment of value criteria

In carrying out the value assessment, the ACD considers the following seven criteria:

Quality of service	a review of the range and quality of services of the ACD, or those directed or appointed by the ACD, and their importance to Shareholders.
Performance	an assessment of performance, net of all charges that have been outlined in the prospectus of each Fund. The focus for the assessment of performance is in the context of the Fund’s investment objectives, considering both total return and also the income return to Shareholders.
AFM costs	identification of “each charge” incurred by the Fund and each class of shares. This reflects what the Fund is paying for each of the services received by both internal and external service providers. This considers the margins attributable to each charge and whether they are reasonable.
Economies of scale	an assessment to what extent the ACD is able to achieve reduced effective costs and charges, as a percentage of NAV, as Assets under Management grows and to what extent these benefits are being passed onto, or are capable of being passed onto, Shareholders.
Comparable market rates	an external comparison between the charges incurred by the Fund and the ‘market rate’ of comparable services.
Comparable services	an internal comparison of the services received by the Fund to that of other funds managed by the ACD.
Classes of shares	a consideration regarding the pricing of a unit class against the pricing of other unit classes within the same Fund, as well as the points of differentiation between these unit classes.

Each area is considered separately for each Fund and all are given equal weight in determining whether we are providing value for money. The assessments contained within this document provide the ACD’s overall assessment of value along with their consideration of each of the seven criteria.

■ Section 4: Assessment of Value

The ACD and ACD Board

This assessment of value report is delivered by Alpha Real Capital LLP. Alpha Real Capital is the ACD responsible for overall management of the Funds covered in the report, in compliance with FCA Handbook. ARC TIME:Funds and ARC TIME:Funds II are non-UCITS retail schemes. ARC TIME:Funds III is a UCITS.

The role of the ACD is to make sure the Fund is operated at all times in the best interest of investors. As ACD, Alpha Real Capital is accountable to the FCA and has ultimate responsibility for each of the Funds.

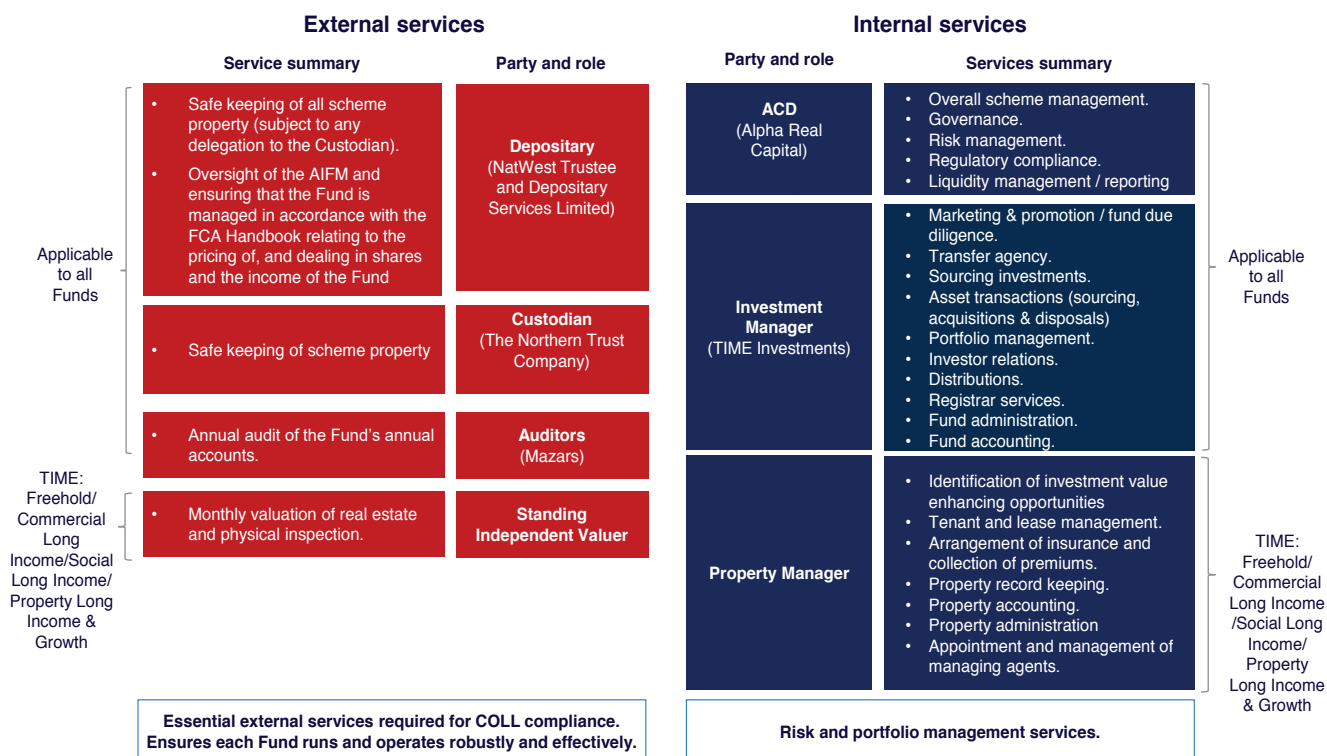
The ACD Board is comprised of five persons including executive members and independent members. We believe a combination of executive and independent ACD Board members is best equipped to ensure appropriate governance, input and challenge is embedded in the assessment of value and wider decision making by the ACD Board.

Responsibilities of the ACD

In seeking to ensure each Fund is being managed in accordance with its stated investment objectives and policies, the ACD Board undertakes and oversees a variety of different services and governance functions on behalf of each Fund.

Whilst many of these services are provided internally, certain of the services have been delegated to specialist service providers or indeed are required to be fulfilled by third parties under the terms of the FCA Handbook.

The diagram below provides a comprehensive but generalised scope of service provisions applicable. Whilst many of these services are applicable to all Funds, some are specific to those Funds which have direct real estate investments namely: TIME:Freehold, TIME:Commercial, TIME:Property Long Income & Growth and TIME:Social.



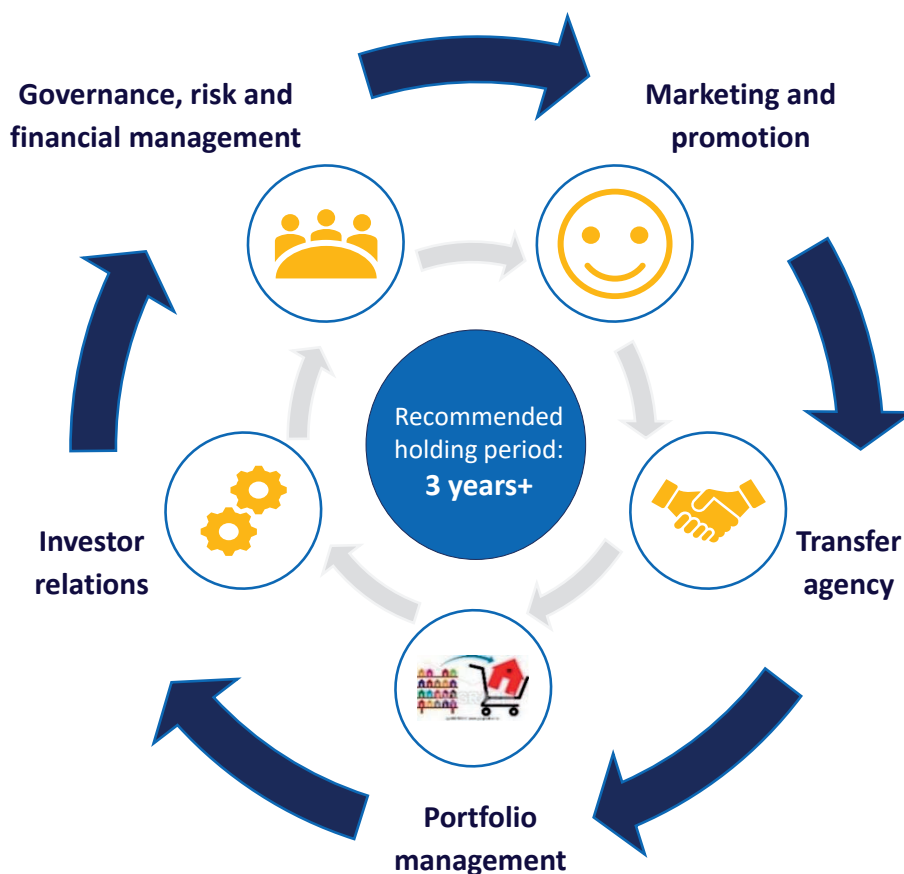
■ Section 4: Assessment of Value

What is an assessment of value?

In accordance with the FCA Handbook, every ACD must conduct an assessment at least annually for each Fund it manages of whether the payments out of the Fund set out in the prospectus are justified in the context of the overall value delivered to shareholders.

As noted, the FCA regulations established seven criteria for which Funds would need to be assessed against as part of the annual assessment of value.

Each of our Funds are designed and managed to support a longer-term investment by a shareholder. Typically our Funds have a recommended holding period of at least 3 years. Over that period, being a journey from original investment contemplation through to initial subscription of shares and ultimately through to share redemption, a shareholder interfaces with the Fund's service providers through a number of junctures, as set out below. These points are underpinned by both internal and external services organised and governed by the ACD on behalf of each Fund.



■ Section 4: Assessment of Value

Our approach to assessing value

For each of the FCA's seven value criteria areas, through the shareholder journey, we have designed and undertaken the following analytical approach as part of our assessment:

	Step 1	Step 2	Step 3	Step 4
Quality of service	Identify all services provided throughout the Shareholder's investment journey	Determine the importance of each of these services to the overall Shareholder experience	Assess the quality of services and the key differentiators through quantitative assessment	ACD Board assessment and conclusions
Performance	Review of performance against the Fund's existing performance measures plus defined peer group	Analysis of absolute and relative performance over defined time horizons	Summary conclusions of data analysis, including on a risk-adjusted basis	
AFM costs	Identification of "each charge" reflecting the services the Fund is paying for and the fees charged	Analysis of the cost base associated with providing internal functions, allowing for margin analysis	Detailed analysis of each identified service and consider margin outcomes	
Economies of scale	Identify services and review fee structures and the approach to procurement and tendering	Quantitative assessment based on historical cost data	Risk based assessment and procurement policies	
Comparable market rates	Establish each service within the management of the Fund to be subject to benchmarking	Define a comparable peer group of funds with comparable services	Undertake benchmarking analysis and consider variations	
Comparable services	Define funds in scope across the full funds range of the ACD	Review comparable services and identify fees for each service	Analysis of identified fee structures	
Classes of shares	Identify each share class within the Fund	Consider all factors that differentiate each share class from one another	Undertake analysis to explain variations	

■ Section 4: Assessment of Value

The overall assessment period is for the 12 months to 31 March 2023. The conclusions apply equally to the relevant dedicated feeder trust, as relevant.

Overall assessment

Taking into account all seven areas included in the assessment of value, we believe that the Fund is demonstrating high value overall.

1 Quality of service	2 Performance	3 AFM costs	4 Economies of scale	5 Comparable market rates	6 Comparable services	7 Classes of shares
<div>KEY</div> <div><div></div>Value is being achieved</div> <div><div></div>Value is being achieved but the fund has some areas that could be improved upon</div> <div><div></div>The assessment has found areas that need action</div>						

1. Quality of service

The ACD has considered the quality of service to Shareholders by considering the direct and indirect interactions with Shareholders over the lifecycle of investment: a journey from initial interest in the Fund and subscription through to redemption. During this period a Shareholder interfaces with the Fund’s service providers through a number of junctures split into five primary areas: marketing and promotion; transfer agency; portfolio management; investor relations and governance, risk and financial management. These are delivered by both internal and external services organised and governed by the ACD on behalf of the Fund, its investment objective and policy.

Against each of the service areas identified, the quality of the services provided to investors has been assessed using the Prospectus terms or key performance metrics, including those with external service providers.

Overall the ACD Board determined that the Fund’s operating model continues to be considered highly effective. Very high levels of service continue to be delivered. In particular, Shareholders continue to receive clear, relevant and timely information to enable them to make informed decisions regarding their investment.

2. Performance

The Fund’s Investment Objective is to offer Shareholders an income return with some capital growth prospects. This is intended to be primarily delivered through investment in a blend of direct UK freehold property (which benefit from long leases) and listed UK REITs.

The Fund’s performance in the 12-month review period to 31 March 2023 has been heavily impacted by the wider underperformance of UK REITs, reflecting the wider economic uncertainty and elevated inflationary and interest rate environment.

It should be noted that the Fund only launched on 1 September 2021 and as at the reference date of this report the Fund remains small scale with Net Asset Value of £17.4 million which will naturally impact the overall performance and other metrics considered elsewhere within the Assessment of Value.

Over the 1 year review period, the Fund’s total return performance was -17.35%. Over the same period, the Fund’s comparative benchmark - being the IA Property Other Sector - delivered a performance of -19.5%, and accordingly a relative outperformance by the Fund. Within the assessment performed the ACD Board also considered relative risk adjusted performance to a basket of peers and the Fund outperformed on this metric also.

■ Section 4: Assessment of Value

The ACD Board remains of the view that the Fund's performance is in line with expectations and no immediate concerns to performance have been identified.

3. AFM costs

The ACD has analytically reviewed all fees and charges incurred by the Fund, including an assessment of margins arising, and confirms the payments out of scheme property, as permitted in the Prospectus, are justified in the context of the overall value delivered to Shareholders and represents good value for money. At present the Fund's fees paid to the AFM are more than outweighed by the costs of operation reflecting the Fund is sub-scale as at the reference date.

4. Economies of scale

It is concluded that all services are appointed on appropriate terms for the scope and quality of services provided.

5. Comparable market rates

The fees paid for each of the services provided to the Fund (whether internally or externally provided) were considered to be sufficiently competitive to those charged by similar competitor funds and those within the UK regulated property funds market. It is noted the Fund has certain expenses which have a minimum base fee or fixed element, such as audit fees, and accordingly the impact of these fees on Fund performance will dilute over time as the Fund attains scale and the Fund's fee rates normalise.

6. Comparable services

On the basis of very limited comparable funds, and the comparable services considered, the fees were deemed to be reasonable compared to the fees charged by associated companies within the Alpha Real Capital group (including associates) for any comparable products available in the UK of an equivalent size and with a similar investment objective and policy to the Fund.

7. Classes of shares

The ACD Board has assessed whether investors hold shares in the most appropriate share class for their investment, in terms of the fees applied and concluded that this was the case and no actions were required. The ACD also considered differentials in the fees charged to different classes of Shares and determined the variations were justified based on the eligibility criteria for different classes.

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