DATA SUBMISSION GUIDELINES

DATA QUALITY

To maintain the highest level of data quality and transparency MPI conducts periodic audits and categorises each investment manager's data quality as follows:

A: Actual client returns (net of fees) for all eligible portfolios (see below).
B: Actual client returns as above (net of fees), based on a significant sample (see below) of eligible portfolios.
C: Model portfolio returns (net of fees), Category C data is not used in the index calculation.

MPI prefer to receive individual portfolio performance however will accept submissions in the following forms:

- Fund/MPS performance.
- A GIPS compliant composite (see below).

RISK CATEGORIES

The manager is free to choose the appropriate risk category for each of their mandates by exercising their judgement of ex-anti risk. MPI will not move a mandate but will monitor the ex-post risk and will inform the manager if the mandate systemically falls outside of the criteria below. MPI reserves the right to exclude mandates which systemically fall outside of their designated risk category. The risk categories are as follows:

LOW RISK. Suitable for more risk averse investors with potentially a shorter-term investment horizon of 3 years or less. Low risk portfolios should not suffer a drawdown of more than 10% and will typically exhibit a volatility of below 6%*.

MEDIUM RISK. Potentially suitable for investors with a medium-term investment horizon of between 3 and 10 years. Medium risk portfolios should not suffer a drawdown of more than 20% and will typically exhibit a volatility of between 6% and 10%*.

HIGHER RISK. Suitable for higher risk investors with potentially a longer-term investment horizon in excess of 10 years. Portfolios within this risk profile typically exhibit a volatility of over 10%* and may suffer a drawdown of more than 20%.

**As measured by the annualised standard deviations of monthly returns over the last 3 years. These ranges are provided for guidance and are subject to periodic review and change.*

ELIGIBLE PORTFOLIOS

Managers may exclude portfolios from their submission on the following grounds:

A: When unable to exercise full discretion over the management of the portfolio due to:
   - Capital Gains Tax
   - Legacy Holdings over which you have no control
   - Significant ethical or other constraints

B: Where the portfolio value is below a minimum size for that strategy:

It is left to the manager to select the most appropriate thresholds to apply for each strategy however, where an exclusion is used it must be applied consistently across that strategy. For example, the manager may not exclude some portfolios below a certain size but not others.

SIGNIFICANT SAMPLE

A significant sample is defined as at least 20% of the eligible portfolios with a minimum of 20 portfolios. These portfolios must be selected at random and remain immutable between periods. A portfolio which closes during the submission period may be replaced with another randomly selected portfolio.

RETURNS CALCULATION

MPI require monthly returns calculated net of fees (see below) and ideally using a daily time weighted return (TWR) methodology. You may calculate your monthly return using a money weighted approach if daily TWR's are not available however consideration should be given to the timings of cashflows within the month to eliminate the impact of large cash movements (see additional considerations below).

Your returns must be provided net of all investment management fees including your management fees, third party fund fees, transaction and custody costs. Fees for wrappers such as SIPPs and Insurance Bonds need not be included. If you are providing a service through a platform you should include a fee for providing investment advice but are not required to include fees associated with additional non-investment related activities such as pension advice.

ADDITIONAL CONSIDERATIONS

The most accurate way to calculate a total return for a defined period where external cash flows occur, is to value the portfolio at the time of when the cash flow occurs and geometrically link sub periodic returns before and after 'large' cash flows. A daily time-weighted rate of return is the preferred method however will be reliant upon the access to sufficient data.

Other methods include the approximation approaches as defined by Modified Dietz and Modified Internal Rate of Return for example are still in place, both of which weight each cash flow proportionally to the time held in the portfolio.

COMPOSITES

MPI will accept a GIPS compliant composite (or equivalent) calculated from the weighted average (arithmetic mean) of the monthly returns for each eligible portfolio in the mandate. Where the portfolio returns are reported gross the composite return should be adjusted for fees as described above. MPI conduct periodic reviews of the calculation and data used in the calculation of composites.

HISTORY

MPI require at least 3 years and ideally 5 years of returns for the initial upload of any new strategy/mandate. New portfolios may be added to the submission but will only be included into your performance calculation from the quarter they first appear.

How to Apply & Contacts

General Enquiries	Reports / Submissions	STEP Contact
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