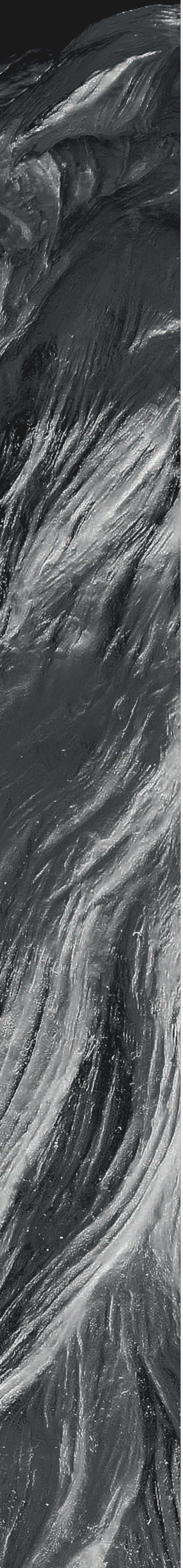
Third quarter 2017

Investment Committee Update

Financial Planning Hub



Welcome

The Omnis Investment Committee oversees all aspects of the Omnis investment offering.

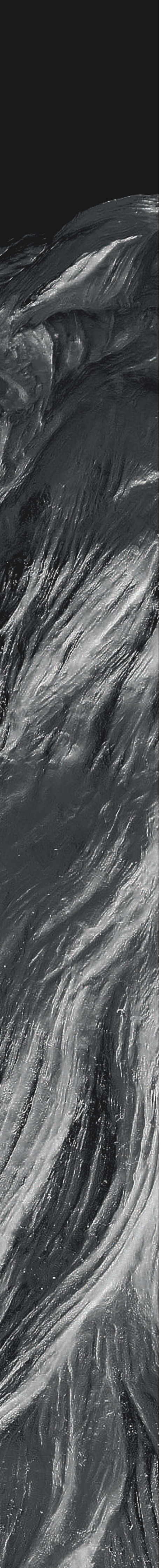
The Committee met recently to discuss the Omnis funds and the performance of the external fund managers. This bulletin summarises the principal discussion points from that meeting and is the latest in a series of regular updates from the Committee, which takes seriously its responsibility to ensure the funds are properly managed at all times.

Market Commentary

As has been the case for much of 2017, political manoeuvring and central bank policy moves largely dominated thinking during the third quarter of the year. Sadly, an earthquake in Mexico and hurricanes Harvey and Irma, which hit the Caribbean and the US in August and September, also left their mark, both on a humanitarian level and from an economic perspective as GDP growth was restricted in those regions.

There were big elections in Germany and Japan for investors to consider, though the re-election of Angela Merkel (with a dwindling share of the vote) and Shinzo Abe (with a strong majority) were welcomed by markets. The 19th National Congress of the Communist Party of China also raised ample fanfare, though much discussion around the world's second-largest economy is focused on its debt burden. Just shy of ten years on from the great credit crisis, the world's major central banks are now beginning to take tentative steps to reverse the protective measures brought in to halt financial ruin.

In September, the US Federal Reserve outlined plans to start 'normalising' its balance sheet, starting to unwind its size slowly over the coming years. Europe remains someway behind in its unwinding cycle though in October the European Central Bank announced it is to halve the amount of bond assets it buys every month from €60bn to €30bn from January next year. The period ended with the UK's first rate rise since July 2007, though this shift in policy is not necessarily a sign that further rate hikes are imminent.



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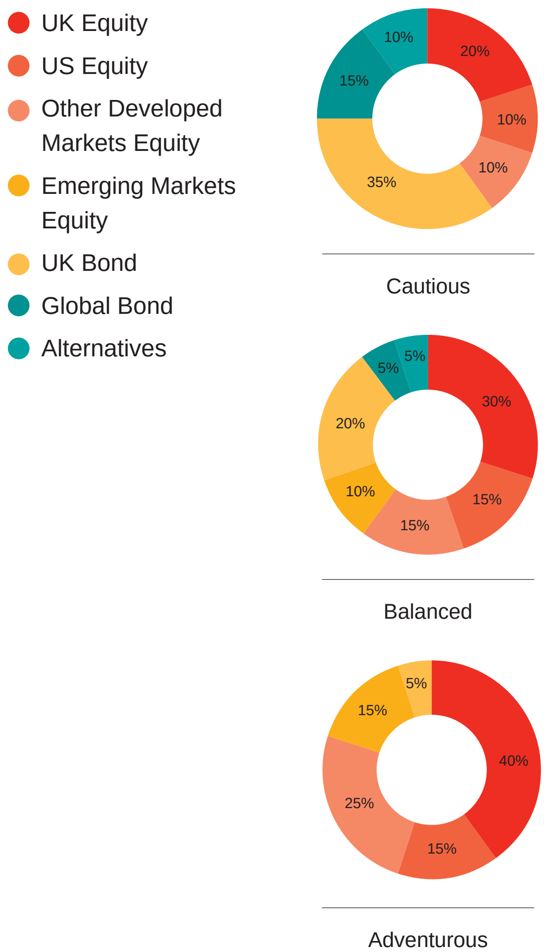
Openwork Graphene Model Portfolios

The Openwork Graphene Portfolios each offer a selection from the Omnis portfolio funds. These funds, discussed individually below, have been designed specifically to complement each other within the Openwork Graphene Portfolios, with allocations determined by the Openwork Investment Committee (see Figure 1).

FIGURE 1: STRATEGIC ASSET ALLOCATION OF THE MODEL PORTFOLIOS

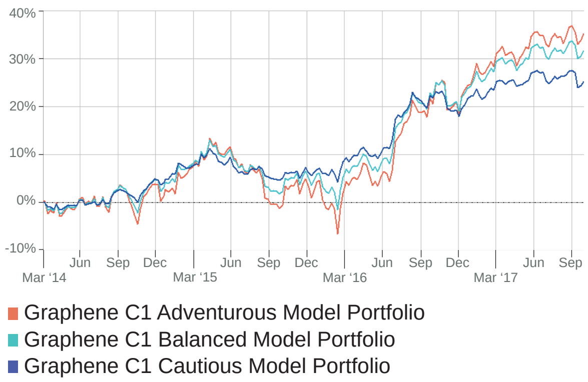


Though the period since launch remains a little short of the recommended medium to long-term holding period, the signs are that the Openwork Graphene Portfolios are still navigating challenging market conditions well.

Over the past twelve months equities on the whole have trended higher, supported by robust company earnings, while bonds have traded downwards as central banks around the world have looked to ease of monetary stimulus, led by the Federal Reserve in the US. Markets took the election of Donald Trump as US president in their stride, with equities trending higher on the hope of significant tax reform. There were tensions with North Korea, as it continued to test and progress a missile programme, leading to short and sharp periods of heightened demand for safe haven assets. Closer to home in the UK, Brexit negotiations with the European Union failed to produce a material breakthrough, as the two parties remained locked in debate over the size of the UK's divorce bill, the Irish border and the rights of EU citizens currently in the UK. This uncertainty somewhat tempered UK equity market gains.

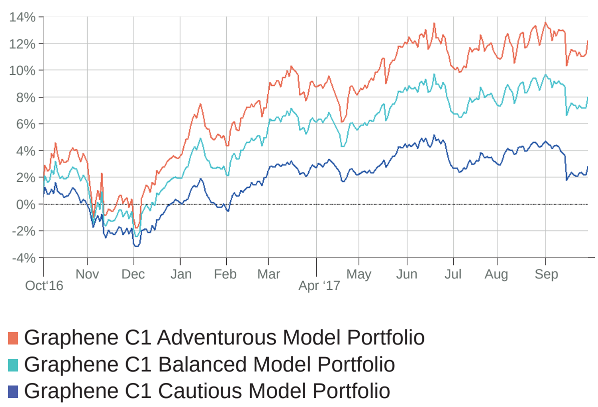
Given that the Adventurous Portfolio has a higher exposure to equity markets it is not perhaps surprising that it has seen the greatest total return over the year. However, at the end of the twelve months, the three models (Cautious, Balanced and Adventurous) have performed in line with expectations. Importantly, all portfolios have benefited from diversification – primarily through fixed income investments and international currency exposures – providing some shelter from the market turbulence; whilst still being able to participate on the upside.

FIGURE 2: OPENWORK GRAPHENE C1 MODEL PORTFOLIOS, TOTAL RETURN SINCE INCEPTION



Source: Omnis Investments, Financial Express Analytics, 28 February 2014 to 30 September 2017. Portfolios rebalanced each 31 August and 28 February.

FIGURE 3: OPENWORK GRAPHENE C1 MODEL PORTFOLIOS, TOTAL RETURN OVER 1 YEAR



Source: Omnis Investments, Financial Express Analytics, 30 September 2016 to 30 September 2017. Portfolios rebalanced each 31 August and 28 February.

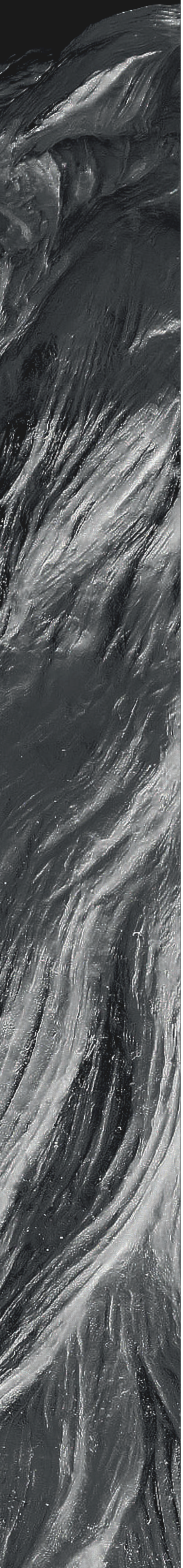


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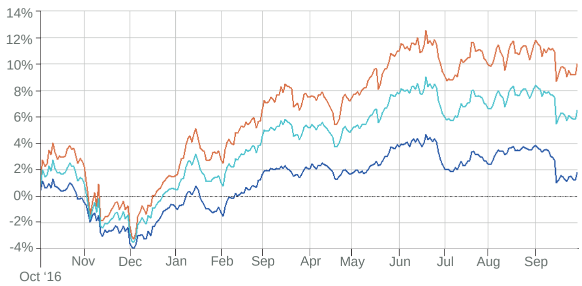
FIGURE 4: OPENWORK GRAPHENE C2 MODEL PORTFOLIOS, TOTAL RETURN SINCE INCEPTION

- Graphene C2 Adventurous Model Portfolio
- Graphene C2 Balanced Model Portfolio
- Graphene C2 Cautious Model Portfolio

Source: Omnis Investments, Financial Express Analytics, 3 May 2016 to 30 September 2017. Portfolios rebalanced each 31 August and 28 February.

FIGURE 5: OPENWORK GRAPHENE C2 MODEL PORTFOLIOS, TOTAL RETURN OVER 1 YEAR



- Graphene C2 Adventurous Model Portfolio
- Graphene C2 Balanced Model Portfolio
- Graphene C2 Cautious Model Portfolio

Source: Omnis Investments, Financial Express Analytics, 30 September 2016 to 30 September 2017. Portfolios rebalanced each 31 August and 28 February.

FIGURE 6: OPENWORK GRAPHENE C3 MODEL PORTFOLIOS, TOTAL RETURN SINCE INCEPTION

- Graphene C3 Adventurous Model Portfolio
- Graphene C3 Balanced Model Portfolio
- Graphene C3 Cautious Model Portfolio

Source: Omnis Investments, Financial Express Analytics, 3 May 2016 to 30 September 2017. Portfolios rebalanced each 31 August and 28 February.

FIGURE 7: OPENWORK GRAPHENE C3 MODEL PORTFOLIOS, TOTAL RETURN OVER 1 YEAR

- Graphene C3 Adventurous Model Portfolio
- Graphene C3 Balanced Model Portfolio
- Graphene C3 Cautious Model Portfolio

Source: Omnis Investments, Financial Express Analytics, 30 September 2016 to 30 September 2017. Portfolios rebalanced each 31 August and 28 February.

The Key Investor Information Documents (KIIDs) and factsheets for the Omnis Portfolio Funds, of which the portfolios are composed, are available from the Omnis website at www.omnisinvestments.com.

Omnis Portfolio Fund Commentaries From The Managers

OMNIS UK EQUITY FUND, MANAGED BY SCHRODER INVESTMENT MANAGEMENT

UK equities rose against a backdrop of a ‘goldilocks’ combination of moderate growth, low inflation and supportive monetary policy. The fund benefited from outperformance from miners South 32 and Rio Tinto, and from alcoholic beverages firm Diageo. Against the benchmark, we also benefited from not holding the underperforming AstraZeneca, GSK and Shire.

The fund was also impacted by underperforming Provident Financial, Imperial Brands and Sainsbury and from underweights in outperforming RDS, Glencore and Anglo American. Among transactions, we bought AstraZeneca, BHP Billiton, Capita, Johnson Matthey and Weir and sold Spire and Reckitt Benckiser. We believe the goldilocks environment discussed above is sustainable even as equity markets start to anticipate a normalisation in interest rates from emergency levels.

Any rise in bond yields could well be positive for financials and cyclicals and negative for staples and utilities, and this will inform the prioritisation of our research efforts. Our ongoing focus is bottom up, however, as we pay particular attention to the technological, regulatory and political changes affecting companies. With the above context in mind, the portfolio is populated pragmatically with a range of growth, quality, value and restructuring stocks, all mispriced with identifiable inflection points to deliver share price outperformance.

OMNIS INCOME & GROWTH FUND, MANAGED BY WOODFORD INVESTMENT MANAGEMENT

This has been a challenging period for performance, with a combination of stock news and a general mood of market antipathy towards much of the rest of the portfolio, weighing on returns. As the summer progressed, global equity markets became increasingly narrowly focused, returning to the themes that drove behaviour in the second half of 2016.

Markets have appeared singularly fixated on stocks that are seen as proxies for Chinese credit growth; in the UK that basically means mining companies, Asian exposed banks and some consumer staple businesses; with the rest of the market languishing behind.

Meanwhile, Provident Financial suffered significant operational disruption in its household consumer credit division. This has been very disappointing for the company and its investors, but we believe that the market substantially overreacted to the news.

As long-term investors, sometimes what we are trying to do will not chime with the mood of the market. Although in the short-term, this is painful to endure, our response to it is to continuously retest our investment hypothesis. In doing so, we have repeatedly returned to the same conclusion that our long-term strategy is very appropriate for the current investment context.

OMNIS US EQUITY FUND, MANAGED BY T. ROWE PRICE

T. Rowe Price took over the running of the fund from TBCAM on the 7 August, with Jeff Rottinghaus appointed as the portfolio manager. The subsequent changes have been significant, particularly within the information technology and financials sectors. US equities climbed higher during despite political instability in Washington, and potential economic disruptions from the impact of hurricanes Harvey and Irma that struck the US, Caribbean, and Mexico.

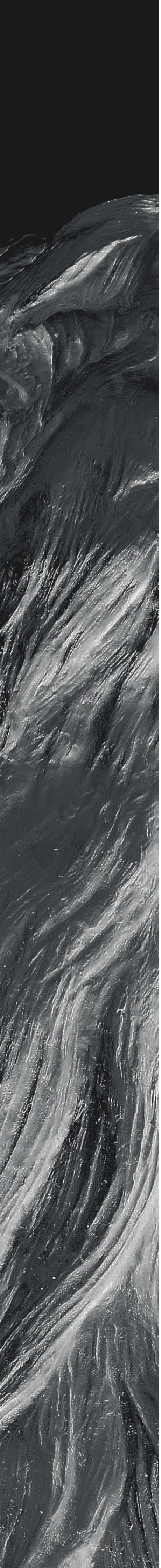
At times, geopolitical tensions, including heightened rhetoric between the US and North Korea, worried investors, but overall equity market reactions were muted. Within the fund, stock selection detracted from relative returns, most notably within the consumer staples, healthcare, and energy sectors. Conversely, an underweight allocation to real estate contributed to relative performance as the sector underperformed the broader index during the period.

Given the relatively full valuations in today’s market, it is getting more difficult to identify attractive investment opportunities. In recognition of this, we believe a more cautious approach is warranted. We have positioned the portfolio for secular growth and continue searching for idiosyncratic investment opportunities, including companies with strong pricing power and recurring revenue models, as well as those we believe are on the right side of change.

OMNIS DEVELOPED MARKETS (EX UK, EX US) EQUITY FUND, MANAGED BY THOMAS WHITE INTERNATIONAL

The fund experienced positive stock selection in the consumer discretionary sector and benefited from an overweight to the industrials and materials sectors. Stock selection lagged in the financials, healthcare, and information technology sectors. However, in technology, the investment team identified several new opportunities during the quarter that mitigated some of the relative shortfall. On a regional basis, stock selection added value in Australia and Hong Kong, France and the Netherlands, as well as in Japan and Israel. Areas of weakness included Demark, Germany, Spain and Switzerland.

The increased technology exposure was the result of purchasing several mid-cap companies that have strong growth potential. Japanese-based Keyence Corp. is a market leader in a range of sensors such as photo-electric, fiber optic, displacement gauge, flow control and laser guides.



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OMNIS EUROPEAN EQUITY FUND, MANAGED BY JUPITER ASSET MANAGEMENT

European equity markets rose over the third quarter, beginning with a supportive round of company results. Although markets declined in August, due to the strengthening of the euro following continued strong economic data and the unwinding of the ‘Trump trade’ they recovered in September. This was despite escalating tension in North Korea and the outcome of the Catalonian referendum on independence.

The fund suffered poor performance from its media-related stocks. ProSiebenSat.1 detracted from performance after the company reduced its revenue guidance for the quarter in its German-speaking broadcasting segment. Publicis also fell despite meeting earnings expectations after competitor WPP reduced its growth forecast. On the positive side, a number of holdings in the portfolio performed well following better than-expected earnings, such as Aroundtown, Kion and Kingspan.

As we enter the next reporting season, we anticipate the usual volatility in individual stocks. Flows and momentum in European equities remain high but we believe there is complacency around the valuation of growth companies, particularly mid-caps, which has led valuations to reach all-time highs in many cases. We remain committed to a disciplined approach to discovering stock opportunities that may be missed by the market while maintaining a portfolio of reasonably priced, quality businesses.

OMNIS ASIA PACIFIC EQUITY FUND, MANAGED BY BAILLIE GIFFORD

It was a fairly uneventful quarter in share price terms, with the MSCI Pacific benchmark increasing in value by around 3% when measured in dollars. Within this, there was very little dispersion in performance between the respective markets across the region, each delivering low single-digit returns.

Over the quarter, the fund was slightly behind the region as several the companies we invest in suffered share price weakness on the back of disappointing short-term earnings releases. We believe that the investment case remains intact, and we focus on the long term creation of value, consistent with the patient low-turnover approach employed by the fund manager.

During the quarter, we invested into Japanese machinery businesses Nidec and Nabtesco both of which are global leaders in highly profitable areas. Funding came from reductions in some existing holdings which have performed well and where our view has become less differentiated from the market. This includes Japanese consumer products businesses Pigeon and Shiseido, and tier-one car parts supplier Denso. We believe that the fund is well-placed to deliver above-average performance over long periods of time, and we continue to generate a healthy flow of ideas from across the region.

OMNIS EMERGING MARKETS EQUITY FUND, MANAGED BY JUPITER ASSET MANAGEMENT

Emerging market equities fell during the period, with performance in sterling terms not helped by a rebound in the value of the pound during September, as well as escalating tensions on the Korean peninsula. Despite this, the underlying fundamentals for emerging markets remained broadly positive. September’s release of economic survey data for China provided some encouragement, as it showed improving business condition across a range of industries, while inflation is gently rising. Also, Korean exports rose significantly during September while in Malaysia corporate loan growth was positive.

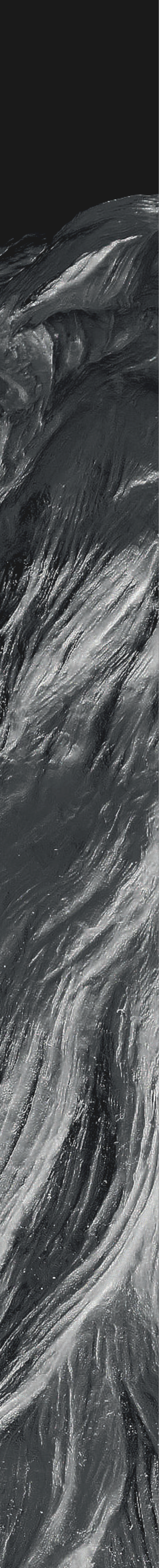
We always endeavour to construct a robust and diverse mix for the fund, and take comfort that an environment of rising earnings means valuations have not got out of hand. The one exception, perhaps, is in some of the larger stocks in the index that are widely held by investors because of their perceived quality or growth prospects; for these companies, valuations are in many cases rather high, in our view. That is not a problem for us in terms of idea generation, however, as we continue to take advantage of the fund’s flexibility to be invested further down the market cap spectrum to explore more compelling opportunities among mid- and small-caps, as well as selectively in frontier markets.

OMNIS UK BOND FUND, MANAGED BY COLUMBIA THREADNEEDLE INVESTMENTS

The sterling bond market weakened slightly over the quarter. This was driven by a rise in gilt yields during September, as geopolitical fears eased somewhat and investors anticipated tighter monetary policy from the Bank of England.

Credit spreads over gilts continued to narrow, supported by strong corporate earnings. The fund was marginally down for the period, but held up better than the market. Strategies relating to the outlook for interest rates hampered performance fractionally, but this was more than offset by the overweight in corporate bonds and favourable credit selection within it. Here, holdings in bonds issued by Annington Funding and Digital Realty were especially beneficial.

The UK bond market remains supported by a weak domestic economic environment. UK consumers face falling real wages and rising personal debt. Brexit-related uncertainty will likely continue to hamper private-sector investment. More positively, exports should provide some support for the economy, given the weaker pound, and the recent spike in inflation should be temporary. The outlook for UK fixed income remains challenging, clouded by the lofty gilt valuations and tighter corporate bond spreads. Given this background, we expect a continuation of the more muted returns seen this year compared to 2016.



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OMNIS GLOBAL BOND FUND, MANAGED BY SCHRODER INVESTMENT MANAGEMENT

Market volatility challenged certain positions in the portfolio, as the fund generated negative returns and underperformed the benchmark. Our management of the fund's sensitivity to US interest rates detracted from performance. However, our view on US corporate bonds contributed positively, as our expectation for increased global growth remained supported by economic data.

Our position in Norwegian Krone contributed positively, due to oil price rises. The portfolio structure remained broadly consistent with the end of the second quarter of the year. One change was the implementation of an overweight position in UK government bonds versus the US, as it is likely the UK economy will slow due to Brexit negotiations. The quarter saw tensions between the US and North Korea escalate and hence there was a temporary rotation into lower-risk assets in August.

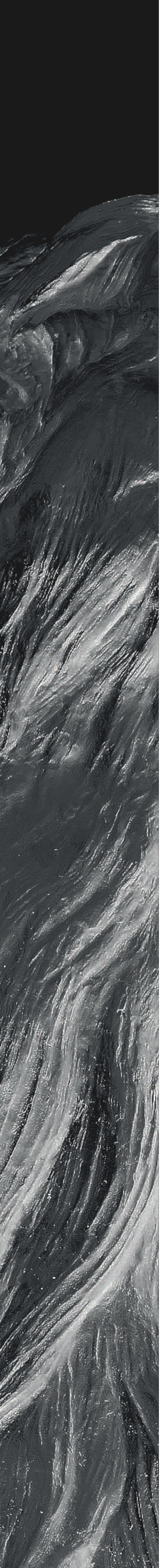
Central bank willingness to increase interest rates and a normalisation of inflation expectations should cause higher volatility. In this environment, portfolios should retain the capacity to exploit changes in the market. Therefore, portfolios should keep a relatively low level of interest rate sensitivity and cautious exposure to corporate bonds. The gradual decrease in global liquidity may also increase volatility. Consequently, selective exposure to emerging market bonds and currencies remains favoured over 'blanket' exposure to all emerging markets.

OMNIS ALTERNATIVE STRATEGIES FUND, MANAGED BY OCTOPUS INVESTMENTS

The fund delivered a positive return, though activity was fairly limited throughout the period as we maintained a diversified balance of holdings. We continued building up holdings in Muzinich Global Tactical Credit, Fulcrum Diversified Alpha and L&G Short Dated Corporate Bond. Recent weaknesses in Invesco Perpetual Global Targeted Returns and Jupiter Absolute Returns provided an opportunity to add to these holdings. We also reduced our holding in BlackRock European Absolute Return following a change in manager.

Good stock selections by Old Mutual Global Equity Absolute Return and BlackRock European Absolute Alpha produced positive returns. However, the weakened dollar negatively impacted iShares USD Treasury 7-10yr Bond ETF and Invesco Perpetual Global Targeted Returns.

There are plenty of things for investors to be positive about, yet we still maintain an element of caution. Continuing improvement in global economic growth presents a strong case to add risk. However, after a prolonged bull run of rising prices, we feel markets are looking a little expensive. Short-term market corrections created by geo-political events, such as growing concern over North Korea's missile testing, may provide more attractive buying opportunities. Despite growing political uncertainty, markets haven't moved a great deal and volatility remains low.



OMNIS MULTI-MANAGER, MANAGED & MULTI-ASSET FUNDS

OMNIS MULTI-MANAGER FUNDS, MANAGED BY OCTOPUS INVESTMENTS

The Omnis Multi- Manager funds offer three risk-rated funds; cautious, balanced and adventurous, which aim to generate capital growth, along with a distribution fund. As fund of funds, they invest in a selection of other pooled investments managed by specialists in their particular markets. The cautious fund holds less risky investments such as bonds, while the balanced fund holds a mix of shares and bonds. The adventurous fund invests mostly in shares.

The Cautious fund produced a marginally negative return for the quarter. In July, we introduced ASG Managed Futures, a fund that seeks to take advantage of positive price momentum in global bond, equity, currency and commodity markets. We funded this by reducing our holding in Oaktree Global Convertible Bond. Actively managed funds in the UK had a strong month, especially Ardevora UK Equity and Majedie UK Equity. When bond yields began to fall and prices rise early in August, we increased our holdings in iShares Core UK Gilt ETF and iShares USD Emerging Market Bond ETF. We also introduced Henderson UK Absolute Return, a fund we know well and which aims to deliver consistent returns from investment in UK companies whatever the market conditions. We funded this purchase through a reduction in our holding in Acadian Diversified Alpha. Actively managed funds produced August's best returns, led by Ardevora UK Equity and CRUX European Special Situations. September saw us shift the portfolio's positioning slightly from UK equities to European equities.

The Balanced delivered a positive return over the period. In July, we invested in Orbis Global Equity, and we reduced iShares GBP Corporate Bond 0-5yr ETF in favour of the slightly longer-duration iShares GBP Corporate Bond ETF. We also re-introduced iShares Global High Yield ETF as a defensive measure to reduce the fund's exposure to the dollar. Holdings that invest in Asia and emerging markets were the portfolio's best performers in July, notably RWC Global Emerging Markets and BlackRock Asia Special Situations. Marlborough Special Situations benefited from its exposure to UK smaller and medium companies. In contrast, Vanguard US Opportunities suffered from a sell-off in the US technology sector. September saw us marginally increase our equity exposure on mid-month market falls. We also sold our remaining holding in JPM US Equity Income, a fund we had held for some time which has delivered steady, if unspectacular, returns.

The Adventurous fund delivered a positive performance over the period. In July, we took some profits from RWC Global Emerging Markets, Goldman Sachs Global Emerging Markets and iShares Emerging Market ETF after a strong month for emerging markets. Good stock selections of UK equities helped Marlborough Special Situations and Ardevora UK Equity improve their performances. A weaker dollar hindered JP Morgan US Equity, Vanguard US Opportunities and Acadian Diversified Alpha. In August, we sold our remaining holding in Morgan Stanley US Growth, benefiting from the recent growth in US technology stocks. We used the proceeds to take a new holding in iShares US Small Cap ETF. Sterling weakness compared with the dollar boosted iShares JPM Emerging Markets Government Bond. On the other hand, the investment trusts TwentyFour Income and P2P Global performed poorly. September saw a new investment in Franklin UK Managers' Focus, a fund we know well and have included in other portfolios.

There are plenty of things for investors to be positive about, yet we still maintain an element of caution. Continuing improvement in global economic growth presents a strong case to add risk. However, after a prolonged bull run of rising prices, we feel markets are looking a little expensive.

The distribution fund is designed for clients looking for a regular and stable income, such as those in retirement. It aims to generate a reasonable level of income and possible capital growth by investing primarily in other pooled investments.

The fund delivered a slightly negative performance during the period. In July, we sold our remaining holding in 3i Infrastructure, an investment we had held since 2009 and which had performed very well for us. However, we have looked to consolidate our infrastructure investments to the two remaining funds, HICL and Renewable Infrastructure Group, to reduce the number of holdings that invest in infrastructure.

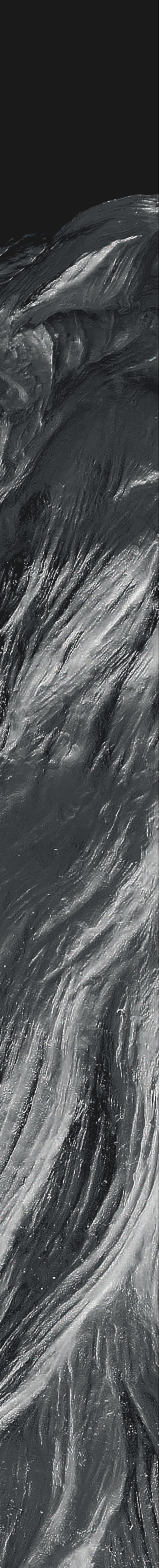
A strong month in July for Asian and emerging market equities benefited Schroder Asian Income, while SPDR UK Dividend Aristocrats produced the portfolio's weakest performance. September saw the introduction of Franklin UK Equity Income, a replacement for Artemis Income which was sold in May, and the third UK equity income fund in the portfolio. We also continued to tactically trade ETFs, seeking to build stakes ahead of their income payment dates.

There are plenty of things for investors to be positive about, yet we still maintain an element of caution. Continuing improvement in global economic growth presents a strong case to add risk. However, after a prolonged bull run of rising prices, we feel markets are looking a little expensive. Short-term market corrections created by geo-political events, such as growing concern over North Korea's missile testing, may provide more attractive buying opportunities.

OMNIS MANAGED FUNDS, MANAGED BY COLUMBIA THREADNEEDLE INVESTMENTS

The Omnis Managed Funds, run by Columbia Threadneedle, are funds of funds. They aim to achieve capital growth by investing in other pooled investments (also managed by Columbia Threadneedle) and offer three risk rated funds; cautious, balanced and adventurous.

This was another positive quarter for equities, which outperformed bonds in aggregate. The period was marked by bouts of risk aversion, with investors unsettled by North Korean sabre-rattling, doubts about president Trump's ability to enact his policies, and the prospect of tighter monetary policy from major central banks. Overcoming this, though, risk appetite was buoyed by encouraging news on the global economy, a strong corporate earnings season and, late in the quarter, resurgent optimism about US tax reform.



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The Cautious fund delivered another positive return. Exposure to fixed income - especially developed government bonds - detracted overall, but this was outweighed by positive contributions from equities, notably from Europe and the UK. Within equities, we reduced exposure to UK income and global income strategies, though we topped up UK equity holdings overall. The largest individual equity overweights remain Europe ex UK and Japan. With electoral risks in Europe now diminished, investors should more readily appreciate the sea-change in corporate fundamentals. Japanese companies have been improving corporate governance and profitability. Within fixed income, where we remain underweight, we retain significant exposure to corporate and emerging market bonds as we believe the additional yield versus core government debt more than justifies the extra risk.

The Balanced fund delivered another solid quarterly return, with the allocations to UK, emerging markets and European equities making the biggest positive contributions. Exposure to fixed income detracted marginally. Within equities we reduced exposure to the US, mainly on valuation grounds, and topped up exposure to the UK. The fund remains overweight in emerging markets, European, Asian and Japanese equities. The fund remains underweight in fixed income.

The Adventurous fund delivered another solid quarterly return, with the allocations to emerging markets, European and UK equities making the biggest positive contributions. Within equities, we reduced exposure to the US and also realised some profits in emerging markets, which have had a very strong run this year. The fund remains overweight in emerging markets, European, Asian and Japanese equities. Within fixed income, we prefer high-yield corporate and emerging market bonds as we feel the additional yield compared with core government debt more than compensates for the extra risk.

OMNIS MULTI-ASSET INCOME FUND, MANAGED BY NEWTON INVESTMENT MANAGEMENT

Our Multi-Asset Income Fund aims to provide income with the potential for capital growth over the medium to long term by investing in a broad range of assets including shares, bonds and currencies. The manager identifies investment opportunities based on a combination of global trends and fundamental analysis.

The third quarter of 2017 saw continued economic expansion, with GDP in the US being revised up, leading equity markets higher. There was continued strong performance in emerging and Asian markets where both Indiabulls, the Indian mortgage provider, and Vakrangee, the provider of online services for the Indian consumer, performed particularly well. Another strong performer was Macau gaming company Sands China.

With policymakers around the world suggesting the economy is now ready to withstand rising interest rates, bond markets began to sell off towards the end of the quarter. This resulted in a small negative return from bonds for the fund, which was limited by our very cautious allocation to the asset class. In addition to suggestions of higher interest rates, the US Federal Reserve has committed to pare back its multi-trillion dollar balance sheet to unwind its extraordinary quantitative easing programme. With the central bank beginning its journey of selling back $2.5trn of government bonds into the market, it is worth remembering that across the globe there are $14trn of government bonds held by central banks. These will need to be unwound over time, which could have significant implications for bond markets if there is a lack of appetite from investors. We continue to follow our investment process of searching for sustainable income through a focus on the underlying cash flows of the companies and securities we invest in.

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