

Research Policy

Research policy for Premier Miton Group plc and its subsidiaries Premier Portfolio Managers Limited and Premier Fund Managers Limited (together, “Premier Miton”).

Investment research

Typically, investment managers such as Premier Miton use a wide range of internal and external investment research from financial institutions such as stock brokers and banks, including analysis on investment markets, sectors and companies to help fund managers make appropriate investment decisions. We believe the use of investment research provided by external companies is an important part of our investment process and adds value for our fund investors through long term performance results.

Following the introduction of MiFID II, investment managers are only permitted to receive external third-party research from third parties when it is paid for from a separate ‘research payment account’ (RPA) managed in accordance with the rules of the Financial Conduct Authority (FCA) or via direct payments from itself.

Investors in Premier Miton’s funds and investment trusts (the Funds) listed in the schedule below are charged the cost of external investment research as this remains a significant part of the active management process for these funds. This will be paid for via the RPA mechanism.

To ensure we have appropriate controls around the use of research, Premier Miton will regularly assess the quality of the research purchased, based on robust quality criteria, and its ability to contribute to better investment decisions for our clients. Premier Miton’s senior management oversee the purchase of research, the budget setting process and the allocation of the research budget to ensure that the amount and cost of the research purchased is reasonable, appropriate and used in the best interests of the Funds. They also ensure that there is a clear audit trail of payments to research providers and records to show how the amounts paid were determined.

Premier Miton also considers the extent to which research purchased through an RPA may benefit the Funds, including, where relevant, by taking into account investment strategies applicable to those Funds, and the approach Premier Miton takes to allocate such costs fairly.

Assessing research and its ability to contribute to better investment decisions

Premier Miton regularly assesses the quality of the research purchased for the Funds, based on robust quality criteria and its ability to contribute to better investment decisions for them. It does this by:

- assessing the need for investment research for each of the Funds, including considering whether it would be in that Fund’s best interest to acquire third party research to assist with investment decisions. This process involves the relevant investment managers preparing a research budget for their Fund, which is discussed and agreed with the Chief Investment Officer of Premier Miton, before consideration by the board of Premier Portfolio Managers Limited.

- assessing the nature of any service, benefit or material paid or provided by any third party to determine whether it will benefit the Funds and it can be accepted (for instance, whether the research should be considered as a minor non-monetary benefit or as research). This includes having processes in place to block unsolicited research.
- assessing the quality of the research received from a third party based on the following criteria: (i) the extent to which the research provides new and detailed analysis to help managers form an investment view; (ii) the extent to which research provides meaningful recommendations based on substantiated opinion which prove to be correct; (iii) the extent to which research covers the analysis of stocks that are otherwise researched; (iv) for portfolios that have sector bias, research that is specific to that sector or sub-sector; and (v) the extent to which research is relevant to the Fund's investment objective and/or investment outcome.
- having internal processes and structures to ensure that the purchase of research is completely independent from the selection of brokers for execution services.
- using internal controls (such as research voting structures) for Premier Miton's investment managers to scrutinise the research received from research providers, for them to justify their requirement for particular research and to ensure they only receive research appropriate for a Fund.

How research may benefit the Funds

Premier Miton purchases investment research, which contains analysis and original insights and reaches conclusions based on new or existing information that could be used to inform an investment strategy and be relevant and capable of adding value to investment decisions on behalf of the Funds.

Premier Miton considers research on a range of subjects including; equity markets, strategy, industry, sector and company specific. A wide range of factors must be considered when making investment decisions; these will be global in nature, constantly changing and without limit. Due to this it is not always possible for Premier Miton to produce the required quantity or quality of proprietary research to support the investment strategies of the Funds. Therefore, research is purchased from selected and trusted third parties in order to augment the proprietary research undertaken.

The purchased research will vary from Fund to Fund and will be selected specifically for the benefit of that Fund. It will include research prepared by advisors to companies and other entities, as well as selected independent research analysts, with the aim of achieving a clear and rounded view of any investment and the construction of a Fund's portfolio in different economic and market conditions.

Approach to allocating the costs of research fairly among the Funds

Research purchased from third parties will be used for the benefit of the Funds in a given investment strategy. Different Funds in different strategies may also use research from the same provider, to the extent permitted by the FCA's rules. The cost will be allocated between the Funds using a predefined allocation formula and monitored by Premier Miton.

Manner in which research charge is deducted from the Funds

Premier Miton has in place budgets for the Funds for the acquisition of research by them, where research is funded from a RPA controlled by Premier Miton with the assistance of its RPA administrator, Instinet Europe Limited. The RPA is funded by a specific research charge to a Fund which is collected from the assets of that Fund periodically throughout the year and passed to the RPA administrator who makes payments for research to research providers in accordance with Premier Miton's instructions.

New Fund Launches - in the case of smaller funds, primarily new launches, Premier Miton may augment the client-funded portion of the research budget to ensure that those strategies have the required research resource. The objective of this additional resource is to help scale the funds to the point that their research costs are broadly comparable to their peer group.

The Schedule

Set out below is the estimated research budget for each Fund for 2025 and the total budgeted amount for research being paid for through an RPA for Premier Miton.

Fund	£ Budget (Inc. VAT)
Premier Miton UK Multicap Income Fund	184,420
Premier Miton UK Smaller Companies Fund	21,712
Premier Miton UK Value Opportunities Fund	185,214
Premier Miton UK Growth Fund	142,845
Premier Miton Responsible UK Equity Fund	109,989
Premier Miton Monthly Income Fund	132,540
Premier Miton Optimum Income Fund	29,910
Premier Miton European Opportunities Fund	338,504
Premier Miton European Sustainable Leaders Fund	closed
Premier Miton US Opportunities Fund	899,697
Premier Miton US Smaller Companies Fund	17,900
Premier Miton Global Sustainable Growth Fund	87,850
Premier Miton Global Sustainable Optimum Income Fund	38,989
Premier Miton Global Infrastructure Income Fund	127,276
Premier Miton Pan European Property Share Fund	55,456
Premier Miton Global Smaller Companies Fund [1]	56,122
Premier Miton Emerging Markets Sustainable Fund [1]	12,963
Diverse Income Trust plc [2]	58,885
Miton Microcap Trust plc [2]	12,909
Premier Miton Financial Capital Securities Fund	10,412
Total	2,523,593

Notes:

[1] Cost capped at 15bps* of the fund's AUM per annum

[2] cost capped at this amount

*on pre-VAT basis

These figures are estimates and subject to change, for instance as a result of currency movements. They are also estimated for the calendar year 2025 and not the financial year

for the relevant Fund. The figures include value added tax. The total amount of the research charge borne by a Fund for each accounting period will be reported in its Annual Report for that period.

It is important to note that our open-ended Fund prices, income payments and performance figures are always shown and paid net of fund fees, which, for our equity funds, includes the cost of external research.

Additional information on the following is available to shareholders on request:

- the providers paid from the RPA;
- the total amount they were paid over a defined period;
- the benefits and services received by Premier Miton; and
- how the total amount spent from the account compares to the budget for that period, noting any rebate or carry-over if residual funds remain in the account.

Please contact Premier Miton's Compliance Team in the first instance if you have any questions regarding the contents of this Policy.

Issued by Premier Miton Investors. Premier Portfolio Managers Limited is registered in England no. 01235867. Premier Fund Managers Limited is registered in England no. 02274227. Both companies are authorised and regulated by the Financial Conduct Authority and are members of the 'Premier Miton Investors' marketing group and subsidiaries of Premier Miton Group plc (registered in England no. 06306664). Registered office: Eastgate Court, High Street, Guildford, Surrey GU1 3DE.