

Transaction Cost Disclosure for Workplace Pensions

Section name:	Clarks Flexible Savings Plan - Former Plan 35 DC
Section number:	N11810

Explanatory Notes:	<p>In line with Financial Conduct Authority (FCA) and Department for Work and Pensions regulations, workplace pension schemes must perform a value-for-money assessment for their scheme. This includes looking at the charges and transaction costs. This table shows the administration charges and transaction costs for each fund in your workplace scheme.</p> <p>The FCA has prescribed the 'slippage cost' methodology for calculating transaction costs. This calculates the transaction cost of buying or selling an investment as the difference between the price of an asset immediately before placing an order in the market and the price at which it actually trades. We've shown below where fund managers haven't used this methodology.</p>
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The data in the table below shows the following:

Administration Charge	This is the fund's annual administration charge (as a % of the value of the fund) for your section of the scheme.
Total Transaction Cost	This is the total of the annual buying and selling costs and the lending and borrowing costs (as a % of the value of the fund) as shown below.
Buying and Selling Transaction Cost	<p>If the Aviva pension fund is managed to an investment mandate set by Aviva UK Life & Pensions, this is the annual cost to this fund (as a % of the value of the fund) in buying and selling its holdings.</p> <p>If the Aviva pension fund invests in a fund managed by an external fund manager, this is the annual cost (as a % of the value of the fund) incurred:</p> <ul style="list-style-type: none"> - in buying and selling units in the underlying external fund, and - by the underlying fund in buying and selling its holdings.
Lending and Borrowing Transaction Cost	This is the annual cost (as a % of the value of the fund) incurred by either the Aviva insured fund and/or the underlying fund in lending and borrowing its holdings.
Transaction Cost Data Missing	<p>This is the percentage of the total value of the fund for which underlying transaction cost data is missing. This includes when:</p> <ul style="list-style-type: none"> a) the fund manager has not provided transaction costs b) the fund manager has not provided transaction costs for a certain percentage of the fund <p>The transaction costs provided are a reflection of the data we have received.</p>
Slippage Cost methodology not used	This is the percentage of the total value of the fund for which a method other than the slippage cost methodology has been used to calculate the transaction costs.

Fund Name	Administration Charge	Total Transaction Cost	Buying and Selling Transaction Cost	Lending and Borrowing Transaction Cost	Transaction Cost Data Missing	Slippage Cost methodology not used	Comments/ Additional Information
Aviva Pension MyM Multi Strategy Target Return	1.35%	1.0365%	1.0365%	0.0000%	0%	100%	
Aviva Pension MyM Schroder Life Intermediated Diversified Growth	1.04%	0.3490%	0.3490%	0.0000%	0%	100%	
Aviva Pension MyM JPM Emerging Markets Equity	1.35%	0.3398%	0.3398%	0.0000%	0%	0%	
Aviva Pension MyM My Future Growth	0.39%	0.1450%	0.1427%	0.0023%	0%	0%	
Aviva Pension MyM BlackRock (Aquila C) Market Advantage	0.63%	0.1438%	0.1444%	0.0024%	0%	0%	
Aviva Pension MyM My Future Drawdown	0.39%	0.1114%	0.1093%	0.0021%	0%	0%	
Aviva Pension MyM My Future Focus Drawdown	0.45%	0.1062%	0.0982%	0.0080%	0%	4%	
Aviva Pension MyM Clarks Target Drawdown	0.40%	0.0986%	0.0965%	0.0021%	0%	0%	
Aviva Pension MyM Invesco Corporate Bond	0.90%	0.0881%	0.0881%	0.0000%	0%	0%	
Aviva Pension MyM My Future Focus Growth	0.45%	0.0850%	0.0827%	0.0029%	0%	0%	
Aviva Pension MyM BlackRock Aq Connect All Stocks UK Gilt Index	0.35%	0.0756%	0.0300%	0.0456%	0%	0%	
Aviva Pension MyM M&F Feeder of Property	1.27%	0.0634%	0.0634%	0.0000%	0%	0%	
Aviva Pension MyM Legal & General (PMC) Global Real Estate Equity Index	0.76%	0.0571%	0.0537%	0.0034%	1%	0%	The costs provided represent those incurred by the underlying fund in buying and selling its holdings and do not include those incurred by the Aviva fund in buying and selling units in the underlying fund(s).
Aviva Pension MyM My Future Consolidation	0.39%	0.0514%	0.0498%	0.0016%	0%	0%	
Aviva Pension MyM HSBC Islamic Global Equity Index	0.65%	0.0495%	0.0495%	0.0000%	0%	0%	
Aviva Pension MyM Baillie Gifford UK Equity Core	0.67%	0.0486%	0.0486%	0.0000%	0%	0%	
Aviva Pension MyM Legal & General (PMC) Retirement Income Multi-Asset	0.63%	0.0458%	0.0375%	0.0083%	0%	0%	The costs provided represent those incurred by the underlying fund in buying and selling its holdings and do not include those incurred by the Aviva fund in buying and selling units in the underlying fund(s).
Aviva Pension MyM My Future Cash Lump Sum	0.38%	0.0374%	0.0374%	0.0000%	0%	0%	
Aviva Pension MyM MFS Meridian Global Equity	1.01%	0.0272%	0.0272%	0.0000%	0%	100%	
Aviva Pension MyM My Future Focus Consolidation	0.45%	0.0239%	0.0234%	0.0005%	0%	0%	
Aviva Pension MyM BlackRock Sterling Liquidity	0.35%	0.0114%	0.0114%	0.0000%	0%	0%	The costs provided represent those incurred by the underlying fund in buying and selling its holdings and do not include those incurred by the Aviva fund in buying and selling units in the underlying fund(s).
Aviva Pension MyM Clarks Cash	0.35%	0.0114%	0.0114%	0.0000%	0%	0%	The costs provided represent those incurred by the underlying fund in buying and selling its holdings and do not include those incurred by the Aviva fund in buying and selling units in the underlying fund(s).
Aviva Pension MyM Legal & General (PMC) Ethical UK Equity Index	0.50%	0.0109%	0.0064%	0.0045%	0%	0%	The costs provided represent those incurred by the underlying fund in buying and selling its holdings and do not include those incurred by the Aviva fund in buying and selling units in the underlying fund(s).
Aviva Pension MyM Baillie Gifford International	0.68%	0.0079%	0.0079%	0.0000%	0%	0%	
Aviva Pension MyM Legal & General (PMC) Ethical Global Equity Index	0.50%	0.0042%	-0.0001%	0.0043%	0%	0%	The costs provided represent those incurred by the underlying fund in buying and selling its holdings and do not include those incurred by the Aviva fund in buying and selling units in the underlying fund(s).
Aviva Pension MyM My Future Focus Cash Lump Sum	0.45%	0.0032%	0.0032%	0.0000%	0%	0%	
Aviva Pension MyM BlackRock Aq Connect Over 5 Year Index-Linked Gilt Index	0.35%	-0.0045%	-0.0045%	0.0000%	0%	0%	
Aviva Pension MyM Clarks Retirement Transition	0.37%	-0.0051%	-0.0233%	0.0182%	0%	0%	
Aviva Pension MyM Clarks Growth	0.36%	-0.0151%	-0.0188%	0.0037%	0%	0%	
Aviva Pension MyM BlackRock Aq Connect Corporate Bond All Stocks Index	0.37%	-0.0161%	-0.0210%	0.0049%	0%	0%	
Aviva Pension MyM My Future Focus Annuity	0.45%	-0.0198%	-0.0201%	0.0003%	0%	0%	The costs provided represent those incurred by the underlying fund in buying and selling its holdings and do not include those incurred by the Aviva fund in buying and selling units in the underlying fund(s).
Aviva Pension MyM Legal & General (PMC) Pre-Retirement	0.42%	-0.0199%	-0.0202%	0.0003%	0%	0%	The costs provided represent those incurred by the underlying fund in buying and selling its holdings and do not include those incurred by the Aviva fund in buying and selling units in the underlying fund(s).
Aviva Pension MyM BlackRock Aq Connect Consensus	0.37%	-0.0227%	-0.0419%	0.0182%	0%	0%	
Aviva Pension MyM BlackRock Aq Connect (50:70) Currency Hedged Global Equit	0.43%	-0.0273%	-0.0343%	0.0070%	0%	0%	
Aviva Pension MyM BlackRock Aq Connect (50:50) Global Equity Index	0.36%	-0.0371%	-0.0432%	0.0061%	0%	0%	
Aviva Pension MyM My Future Annuity	0.38%	-0.0442%	-0.0445%	0.0003%	0%	0%	
Aviva Pension MyM BlackRock Aq Connect World ex UK Equity Index	0.35%	-0.0488%	-0.0525%	0.0037%	0%	0%	
Aviva Pension MyM BlackRock Emerging Markets Equity (Aquila C)	0.59%	-0.0599%	-0.0912%	0.0313%	0%	0%	
Aviva Pension MyM BlackRock Aq Connect UK Equity Index	0.36%	-0.1379%	-0.1417%	0.0038%	0%	0%	
Aviva Pension MyM BlackRock Aq Connect Over 15 Year Corporate Bond Index	0.37%	-0.1840%	-0.1885%	0.0045%	0%	0%	