

Key Information Document

Purpose

This document provides you with key information about this investment product. It is not marketing material. The information is required by law to help you understand the nature, risks, costs, potential gains and losses of this product and to help you compare it with other products.

Alert

You are about to purchase a product that is not simple and may be difficult to understand.

Product

Product: Strategic Equity Capital plc ("the Company")
 ISIN: GB00B0BDCB21
 Website: www.strategiequitycapital.com
 Manufacturer: Gresham House Asset Management Limited, Octagon Point, 5 Cheapside, London, EC2V 6AA
www.greshamhouse.com
 Competent Authority: Financial Conduct Authority
 Date of production of KID: 17 November 2020

What is this product?

Type

The Company is a closed-ended investment company whose shares are listed on the London Stock Exchange and an alternative investment fund under the Alternative Investment Fund Managers Directive. The Company's ordinary shares are therefore available to the general public.

Objectives

The investment objective of the Company is to achieve growth in the value of investments over a medium-term period, principally through capital growth. The Company seeks to achieve this objective through its investment policy which is to invest primarily in equity and equity-linked securities quoted on markets operated by the London Stock Exchange, with the flexibility to invest up to 20% of the Company's gross assets at the time of investment in (i) securities quoted on other recognised exchanges; and (ii) unquoted securities.

Intended Retail Investor

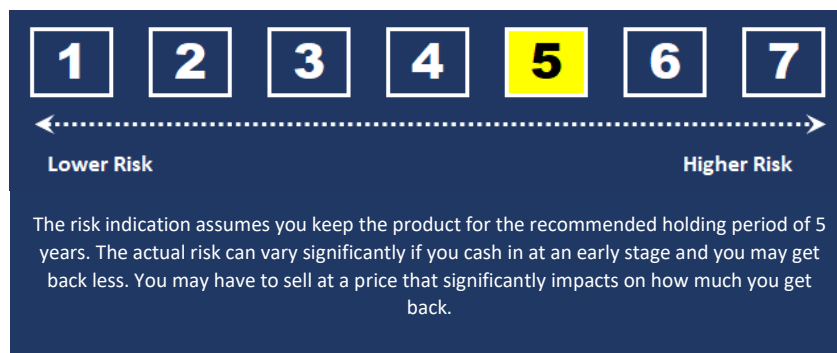
The Company is suitable for all investors seeking a fund that aims to deliver growth with a long investment term horizon as the core or a component of a portfolio of investments. The stock market provides ready access to the investment. The investor should be prepared to bear losses. The Company is compatible for mass market distribution.

Bid/Offer spread:

Shares of the Company are bought and sold via markets. Typically, at any given time on any given day, the price you pay for a share may be higher than the price at which you could sell it.

What are the risks and what could I get in return?

Risk Indicator



The summary risk indicator is a guide to the level of risk of this product compared to other products. It shows how likely it is that the product will lose money because of movements in the markets. **The assessment is based on past share price performance which should not be taken as an indication of future performance.** We have classified this product as 5 out of 7 which is a medium-high risk class. This rates the potential losses from future performance at a medium level. This product does not include any protection from future market performance so

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you could lose some or all of your investment. Capital may be at risk as the value of investments may go down as well as up and is not guaranteed and therefore investors may not get back the amount originally invested. The shares may trade at a discount to the net asset value of the Company.

Performance scenarios

Performance Scenarios		1 year	3 years	5 years (Recommended holding period)
Stress Scenario	What you might get back after costs	£945	£2,488	£2,368
	Average return each year	(91%)	(37%)	(25%)
Unfavourable scenario	What you might get back after costs	£7,143	£5,319	£4,238
	Average return each year	(29%)	(19%)	(16%)
Moderate scenario	What you might get back after costs	£9,638	£8,921	£8,259
	Average return each year	(4%)	(4%)	(4%)
Favourable scenario	What you might get back after costs	£12,931	£14,882	£16,003
	Average return each year	29%	14%	10%

This table shows the money you could get back over the next 5 years, under different scenarios, assuming that you invest £10,000 today. The scenarios shown illustrate how your investment could perform. You can compare them with the scenarios of other products. The scenarios presented are an estimate of future performance based on evidence from the past on how the value of this investment varies and are not an exact indicator. What you get back will vary depending on how the market performs and how long you keep the investment. The stress scenario shows what you might get back in extreme market circumstances, and it does not take into account the situation where we are not able to pay you. The figures shown include all the costs of the product itself, but may not include all the costs you pay to your adviser or distributor. The figures do not take into account your personal tax situation, which may also affect how much you get back.

What happens if Gresham House Asset Management Limited is unable to pay out?

There is no direct financial exposure for shareholders of Strategic Equity Capital plc to Gresham House Asset Management Limited.

Gresham House Asset Management Limited is covered by the Financial Services Compensation Scheme. In the event that Gresham House Asset Management Limited cannot meet its liabilities, the scheme will cover eligible claimants for up to £50,000. Please note, the scheme does not cover a failure of the Strategic Equity Capital plc fund. For more information see www.fscs.org.uk.

What are the costs?

The Reduction in Yield (RIY) shows what impact the total costs you pay will have on the investment return you might get. The total costs take into account one-off, ongoing and incidental costs. The amounts shown here are the cumulative costs of the product itself, for three different holding periods. They include potential early exit penalties. The figures assume you invest £10,000. The figures are estimates and may change in the future.

Costs over time

The person selling you or advising you about this product may charge you other costs. If so, this person will provide you with information about these costs and show you the impact that all costs will have on your investment over time.

Costs over time

Investment scenarios £10,000	If you cash in after 1 year	If you cash in after 3 years	If you cash in after 5 years (recommended holding period)

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Total costs	£171	£483	£759
Reduction in Yield (RIY) per year	1.71%	1.71%	1.71%

Composition of costs

The table below shows:

- the impact each year of the different types of costs on the investment return you might get at the end of the recommended holding period; and
- the meaning of the different cost categories.

The table below shows the impact on return per year

One off costs	Entry costs	0.0%	The impact of the costs you pay when entering your investment. (This is the most you could pay and could pay less). The impact of costs already included in the price.
	Exit costs	0.0%	The impact of the costs of exiting your investment when it matures.
Ongoing costs	Portfolio transaction costs	0.11%	The impact of the costs of us buying and selling underlying investments for the product.
	Other ongoing costs	1.33%	The impact of the costs that we take each year for managing your investments.
Incidental costs	Performance fees	0.26%	The impact of the performance fee. We take these from your investment if the product outperforms its benchmark of rolling three-year FTSE Small Cap ex IT total return index plus 2% per annum, subject to a high watermark.
	Carried interest	0.0%	The impact of carried interest.

How long should I hold it and can I take money out early?

Recommended minimum holding period: 5 years

The Company's ordinary shares are designed to be held over the long term and may not be suitable as short term investments. There is no guarantee that any appreciation in the value of the Company's investments will occur and investors may not get back the full value of their investments. The value of ordinary shares and the income derived from them (if any) may go down as well as up. The Company does not have a fixed winding up date and therefore, unless shareholders voted to wind up the Company, Shareholders will only be able to realise their investment through the market. Although the ordinary shares are traded on the main market, it is possible that there may not be a liquid market in the shares and investors may have difficulty selling them. Accordingly, investors may be unable to realise their shares at the quoted market price (or at the prevailing net asset value per share), or at all. You may sell your investment within the recommended holding period without penalty.

How can I complain?

As a shareholder of the Company you do not have the right to complain to the Financial Ombudsman Service about the management of the Company.

If you have a complaint about this product, you can call our team on **020 3837 6270**, email us at **info@greshamhouse.com** or write to us at **Gresham House Asset Management Limited, Octagon Point, 5 Cheapside, London, EC2V 6AA.**

Other relevant information

Copies of the latest annual and half yearly annual reports may be obtained from www.strategiequitycapital.com.

The cost, performance and risk calculations included in this key information document follow the methodology prescribed by EU rules.

Depending on how you buy these shares you may incur other costs, including broker commission, platform fees and stamp duty. The distributor will provide you with additional documents where necessary.