

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.

Product

Product Name: BRITISH EMPIRE TRUST PLC (The “Company”)
 Product Manufacturer: Asset Value Investors Limited
 Product Code: GB0001335081
 Call +44 (0)20 7659 4800 for more information.

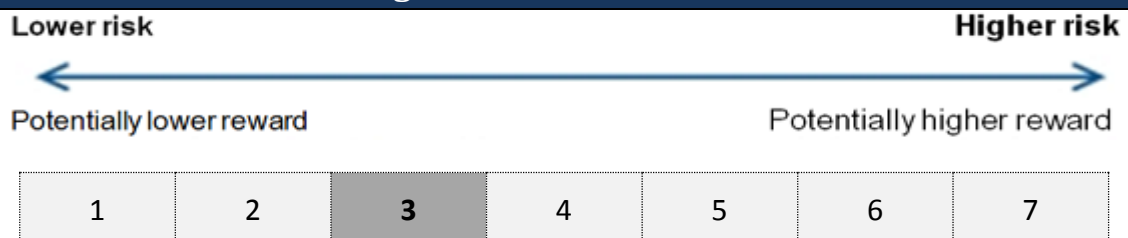
National Competent Authority: Financial Conduct Authority
 This document is accurate at its production date 31 December 2018

Alert: You’re about to purchase a product that is not simple and may be difficult to understand.

What is this product?

Type	British Empire Trust plc, formerly British Empire Securities and General Trust plc, is a closed-end investment trust.
Objectives	The investment objective of the AIF is to achieve capital growth through a focused portfolio of investments, particularly in companies whose share prices stand at a discount to estimated underlying net asset value. Investments are principally in companies listed on recognised stock exchanges in the UK and/or overseas, which may include investment holding companies, investment trusts and other companies, the share prices of which are assessed to be below their estimated net asset value or intrinsic worth.
Gearing	British Empire Trust plc has borrowed to purchase assets for the company. This will magnify any gains or losses made by the Company. At the production date of this document the Company had the following borrowings: - £15,000,000 8 1/8 per cent 2023 Debenture stock - £30,000,000 4.184% Unsecured Loan Notes 2036 - €30,000,000 3.249% Unsecured Loan Notes 2036 - €20,000,000 2.93% Unsecured Loan Notes 2037
Bid-offer spread	Shares of British Empire Trust plc are bought and sold via markets. Typically, at any given time on any given day, the price you pay for a share will be higher than the price at which you could sell it.
Intended retail investor	Due to the nature of the investment strategy, this fund may not be appropriate for investors who plan to withdraw their money within 5 years.

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



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 manufacturer has classified this product as 3 out of 7, which is a medium risk class. This rates the potential losses from future performance at a medium level.

Be aware of currency risk. If you are a non-UK investor, you will receive payments in a different currency, so the final returns you will get depend on the exchange rate between the two currencies. This risk is not considered in the indicator shown above.

This product does not include any protection from future market performance so you could lose some or all of your investment.

Performance Scenarios

Invested Amount: £1000				
		1 year	3 years	5 years (recommended holding period)
Favorable scenario	What you might get back after costs Average return each year	1,113.98 11.40 %	1,182.31 6.08 %	1,224.79 4.50 %
Moderate scenario	What you might get back after costs Average return each year	975.31 -2.47 %	925.01 -2.50 %	875.00 -2.50 %
Unfavorable scenario	What you might get back after costs Average return each year	851.75 -14.82 %	717.80 -9.41 %	611.62 -7.77 %
Stress scenario	What you might get back after costs Average return each year	650.82 -34.92 %	583.59 -13.88 %	439.75 -11.21 %

This table shows the money you could get back over the next 5 years, under different scenarios, assuming that you invest £1,000. 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. They are based on share price total return with dividends reinvested. What you get will vary depending on how the Company's underlying investments perform, how the overall 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 the Company is not able to pay you on its liquidation.

What happens if BRITISH EMPIRE TRUST PLC is unable to repay?

The fund is a closed-end investment trust company listed on the London Stock Exchange and therefore investors will be able to close their investments on each working day. As a shareholder of British Empire Trust plc you would not be able to make a claim to the Financial Services Compensation Scheme (or equivalent overseas authorities in the case of non-UK shareholders) in the event that the company is unable to pay out.

What are the costs?

Costs over the time

Invested amount: £1000 Scenario	If you cash in after 1 year	If you cash in after 3 years	If you cash in after 5 years
Total Costs	33.60	100.80	168.00
Impact on return (RIY) per year	3.36 %	3.36 %	3.36 %

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 £ 1000. The figures are estimates and may change in the future.

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;
- The meaning of the different cost categories.

Other ongoing costs of 3.29 % includes: 0.87% ongoing charges (per latest annual report), 1.95 % ongoing costs applied at the underlying portfolio, and 0.47% cost of gearing.

One-off costs	Entry costs	0.00 %	The impact of the costs you pay when entering your investment. This is the most you will pay, and you could pay less. The impact of the costs already included in the price. This includes the costs of distribution of your product.
	Exit costs	0.00 %	The impact of the costs of exiting your investment when it matures.
Ongoing costs	Portfolio transaction costs	0.07 %	The impact of the costs of buying and selling underlying investments for the product.
	Other ongoing costs	3.29 %	The impact of the costs charged each year for managing your investments.
Incidental costs	Performance fees		Not Applicable.
	Carried interests		Not Applicable.

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

Due to the nature of the investment strategy, the suggested holding period is at least 5 years. However the Company is a closed-end investment trust company listed on the London Stock Exchange and therefore investors will be able to close their investments on each working day.

How can I complain?

Investors in BRITISH EMPIRE TRUST PLC do not have the right to complain to the Financial Ombudsman Service (FOS) about the management of BRITISH EMPIRE TRUST PLC. Complaints about the Company or any of its related documentation should be sent to either the AIFM or Company Secretary (see contact details below):

AIFM:
Asset Value Investors Limited
25 Bury Street
London
SW1Y 6AL
Tel. +44 (0)20 7659 4800
info@assetvalueinvestors.com

Company Secretary:
Link Asset Services
51 New North Road
Beaufort House
Exeter EX4 4EP
Tel. +44 (0)20 7659 4800
btem_cosec@linkgroup.co.uk

Other relevant information

For more information, please visit the Company's website at www.british-empire.co.uk